

Much Wenlock Neighbourhood Plan Corres
Much Wenlock Town Council

Much Wenlock Town Council
Corn Exchange, Much Wenlock
Shropshire, TF13 6AE

15th January, 2013

Public Consultation Saturday, 12th January 2013
Comments to meet deadline of midnight 15th January 2013

We make two initial points in that it seems very unreasonable to expect any detailed response to the Neighbourhood Plan in such a very short period of time between the actual Consultation on Saturday 12th January 2013 and your deadline of midnight Tuesday 15th January 2013. The length of time of that process is inadequate.

Secondly it seems very clear that in so far as the **Neighbourhood Plan Steering Group Membership** is concerned the "**Vision of the Plan**" of the empowerment of residents of Much Wenlock would not appear to have been achieved. Whilst it is accepted that most members of the Steering Group may well live within the Parish only one member appears not to be a present or past member of Much Wenlock Town Council or a past staff member of the same Council or a current employee of Natural England. We believe this is very relevant particularly in relation to the following stages of the process of this plan.

In the very short time available to us we would wish to concentrate our comment in relation to the proposed Housing Development Scenarios particularly using readily available knowledge and evidence from past events as it concerns extreme **Surface Water (Pluvial) Flooding and River Flooding (Fluvial Flooding)** associated with development/s on the Much Wenlock area Catchment.

The Joseph Rowntree Trust report of November 2011 on Pluvial Flooding described flooding as "***probably the most Significant Natural Hazard we face in the UK and there is more to the issue than just coastal and River Flooding***"

Evidence exists of a number of flood events in this Parish over decades with the last major Surface Water and River Flooding event of the **25th June, 2007** where at least **65** Much Wenlock properties were subject to inundation of Flood water and in many cases accompanied by raw sewage.

On the 8th September, 2008 a similar Pluvial event occurred at Bourton another part of the Parish. Whilst the numbers involved in Bourton may have been smaller it was none the less a very serious Surface Water Flooding event. Such events have considerable short and long term detrimental consequences for those personally involved and for Communities in General. Fear factor is certainly raised ever time storms are forecast.

Much was made at the time of these events being extremes of Weather and figures of a **1 in 200** event were quoted but we now know that the 25th June, 2007 event was actually a **1 in 8**.

In that 1 in 8 event considerable overflow took place particularly from the "Pound" situated on the main River at the side of the A458. The Pound is understood to be in Much Wenlock Town Council ownership.

Should the overall Plan now go forward containing the Housing Scenarios, whether they will be in the Scenario 1 or Scenario 2 format, residents in the anticipated Referendum will no doubt have the option to agree or disagree with the Plan as presented by the Steering Group. The outcome being that if they support the overall Neighbourhood Plan then inevitably considerably more Housing Development (at least 80 to 90 dwellings even on one site) will take place in the Much Wenlock Catchment. Whether that be smaller sites such as Exception Sites or a larger scale development such as an extension of Hunters Gate.

We believe that account should be taken of the following and should have been identified in the Shropshire Local Development Framework Adopted Core Strategy.

Following the Flooding event of the 25th June, 2007 Much Wenlock residents petitioned for and obtained a Parish Referendum in relation to Flooding and Development issues. An example of local action that obviously pre-dates the Localism Act.

On the 3rd January, 2008 at Item 7 Much Wenlock Town Council received detail of that referendum which had taken place on the **18th December, 2007** in relation to Development and Flooding. **461** residents voting for no further Development until Flooding and Drainage issues had been resolved and **13** voted for further development.

The Council resolved to send letters to all agencies informing them of the continuing support of the Town Council to the problems highlighted in the recent Referendum.

Despite the Electors referendum result considerable further development has actually taken place in the Much Wenlock catchment since June 2007 increasing the potential Flood Risk and associated hazards.

We are aware of Objective 3 of the Plan - Reducing Flood Risk

Shropshire Local Development Framework Adopted Core Strategy March 2011 is very light on any detail on what must be considered one of this counties major At Flood Risk Areas. Considering that 65 properties in the town were flooded on the 25th June, 2007, a far higher number than shown in Shrewsbury Flood Alleviation Schemes information sheets, the core strategy reads

4.54Much Wenlock is also susceptible to flooding, particularly from surface water, with runoff from the surrounding area and an inadequate drainage system that cannot cope with the volume of water being a particular issue, which causes disruption to parts of the town during heavy rainfall”.

Shropshire Council Adopted Core Strategy March 2011

We believe that to be very understated and is yet another example of the failure of Elected Members over many years to bring the problem of Major Flooding of Much Wenlock to prominence. (We have many more examples).

For the, at least 65, property owners subject to Flooding on the 25th June 2007 disruption lasted much more than the period of heavy rainfall and for some that disruption lasted for well over 18 months and with it comes Health problems etc all of which should and must be relevant to this plan.

We do not believe the Policies in relation to Objective 3 as outlined go anywhere near to adequately address the issue of Flooding in the Much Wenlock Catchment.

European Directives and National Planning Policy Framework would appear to apply to Neighbourhood Plans at this stage of the process and not just to Local Authority Local Plans. During the Consultation Open Meeting process at least one member of the Steering Group appeared to be giving the impression that this was not the case. We believe this plan does involve a duty for such issues to be fully addressed at this stage of the process which is not apparent from the information at hand.

Since the June 2007 Flood considerable further attenuation has been added in the catchment. This is increasing on water attenuation that was already in place on the likes of Hunters Gate/ Falcon Court Developments as examples.

The Neighbourhood Plan supports yet more water to be held in attenuation on the Much Wenlock catchment.

Halcrow Group Limited report of September 2007 to Bridgnorth District Council for the Strategic Flood Risk Assessment for Local Development Framework Level I reported on page 30

“In the North of the District a tributary of the River Severn, Shylte Brook is shown to include a substantial number of properties at Much Wenlock within Flood Zone 3. Improvement works to the Culvert that carries flows through much of the Town took place in 2003, though the capacity is unknown as flooding occurred during the Summer Flood Events in 2007. The implementation of SUDS for new developments in this area is essential, though the Environment Agency has noted that should these fail in a storm situation, the residual risks can be significant especially on catchments of this nature”

Halcrow Group Limited September 2007

Whilst this clearly identifies that SUDS must be included in all new Developments, as supported by Neighbourhood Plan Objective 3, and these may well offer some assistance to a Surface Water event of sudden onset but it seems clear that the Environment Agency draws attention to the possibility of failure of such which may cause significant residual risks and recognition that this, Much Wenlock, is a special catchment.

In practical terms if considerable amounts of attenuated water is built up over a period prior to the actual storm event the problems are significantly increased.

The Neighbourhood Plan appears to support much more attenuation to be held in catchment both above and below the Town. Of particular concern must be the proposal contained in Scenario 2 discussed with Wenlock Estates to store further surface water run off in the Parkland to the rear of Barrow Street. On the 4th July, 2008 a significant water pollution incident occurred following a breach in the dam of a similar attenuation facility in that locality. What safeguards are in place to support this suggestion? (Environment Agency Pollution incident Number 602093 refers)

What also concerns us is the statement at Policy 3.3

“Any significant new development will be encouraged to route storm water and excess water away from the Town, whilst not putting homes downstream at a significantly greater risk.”

In a catchment so steep and short as Much Wenlock Catchment the objective may be laudable but impossible to achieve.

The Drainage Officer for Shropshire Council in a 1996 Report suggested that the possible way to alleviate Much Wenlocks Pluvial Flooding was to **channel storm water through the Town**. The Much Wenlock Catchment has been likened to that of Boscastle in Cornwall. Halcrow, as mentioned earlier have carried out the Boscastle Flood Alleviation Plan and they appear to have adopted this method of surface channelling rather than any increased attenuation stored on the catchment.

We believe Policy 3.3 should do more to protect the area of Farley and the Community of Farley downstream of the Town. We believe the proposals for more development in Much Wenlock will further increase the Flood Risk for the residents of Farley and possibly those travelling through or to that locality.

We cannot see how this Policy 3.3 is consistent with **National Planning Policy Framework 100 “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk but where development is necessary making it safe without increasing flood risk elsewhere”**. We believe that clearly this applies not just to locations within Much Wenlock but must take in to account the likes of Farley which will be the **“elsewhere”** In so far as Much Wenlock developments are concerned.

We believe that a substantial amount of evidence is readily available and has been for many years that a number of areas of Much Wenlock steep short catchment is at considerable risk of flooding including areas identified for potential development under this Neighbourhood Plan. **Development which will also increase flood risk elsewhere.**

Policy 3.3. indicates "**whilst not putting homes downstream at significantly greater risk.**" This Policy appears to acknowledge that the flood risk downstream i.e. Farley may be at a higher risk but uses the word "significantly". A word that does not appear in the National Planning Policy Framework Section 100.

How can it be possible to develop at the very least a further 80 to 90 dwellings in the catchment, of whatever type, i.e. another **FOUR** Forester Gardens Housing Developments, without exposing Farley downstream to a considerably increased risk of Flooding. We have evidence of what happened with a 1 in 8 Flood event on the 25th June, 2007. To allow such major development on the catchment above Farley will need to not only defy the laws of Gravity but also appears to ignore past events.

Objective 3 at "Supporting the use and/or enlargement of containment ponds downstream from the treatment works". Appears to ignore the incident on the 4th July, 2008 where a breach of one of the dams resulted in a serious pollution incident on the Farley Brook. Such surface water attenuation facilities often contain many contaminants and the objective as outlined in the Plan is likely to result in the storage of more contaminants on the central area of the **Much Wenlock Aquifer**. Have the Environment Agency approved such increased Storage?

The way that part of the Objective is outlined also tends to suggest this would involve attenuation which interferes with the Natural flow of the main River Watercourse. We must state that we are rather surprised that any landowner is willing to take on such responsibility for what appears to be such an interference with a known problem watercourse or is such responsibility being accepted by the Environment Agency. Clarification in this respect would need to be conveyed to the intended audience for this Plan.

In so far as Housing Development Scenario 1 very little detail is supplied to the reader of the Plan as to just who "Shropshire Housing Group" actually are. Our own research appears to indicate the possibility of a number of Limited Companies being part of this overall Housing Group or certainly connected with this Group. A full explanation who the Much Wenlock Town Council is intending to adopt a "Collaborative Partnership" is required and is a Partnership with Limited Companies indeed possible. Lists of those persons involved etc would give the reader a better understanding of just who the intended partners are.

Is it also the intention that these Craven Arms based Companies will control all aspects of Scenario 1 Housing within Much Wenlock. If this is the case it is difficult to see how such Housing meets local sustainability criteria. At present Residents regularly see Wrekin Housing Trust Vehicles in the Town travelling round trips of at least 17 miles to that organizations properties. Are we to see more Total Response Limited Vehicles from Craven Arms adding to this housing maintenance traffic on round trip journeys of 35 miles. It is difficult to see this as sustainable in the overall picture.

The residents of Much Wenlock in holding a Referendum of the Parish Electorate on the 18th December 2007 on the issue of Development and Flooding and Drainage **was a forerunner of LOCALISM**. In spite of that the Parish Referendum and the overwhelming result against further development has been ignored and is now being further undermined by the adopted Core Strategy and the Neighbourhood Plan.