

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref	Authors/reference number A0449 Jim Orves A0028 MWTC A0088 MW Refresh Group A0469 MW Civic Society A0471 Sue O'Dowd
Matter	8 Infrastructure
Relevant questions nos.	Q1, Q2, Q4, Q9, Q18

[1. Shropshire's Strategic Infrastructure and Investment Plan 2022](#) defines infrastructure as being made up of 5 elements, namely:

1. Power and Renewables
- 2. Environment and Utilities**
3. Data and Digital
- 4. Social Infrastructure**
- 5. Transport and Highways**

This response addresses items **2, 4** and **5**. It is focused on the immediate environs around Much Wenlock i.e. Ironbridge, Bridgnorth, Telford & Wrekin and Cressage. Where extracts from the Draft Local Plan (SLP) and other respondents have been included, the pertinent text has been highlighted in **yellow** for clarity.

2. Environment and Utilities

[DP19. Water Resources and Water Quality & DP20. Water Efficiency:](#)

The Shropshire Local Plan states in section 4.1.80:

4.180. The phasing of new sewerage and waste-water treatment infrastructure, which may be required to serve new development, will need to avoid overburdening water resources. **The Shropshire Water Cycle Study (2020) assesses the impact of new development on the county's water infrastructure and shows where development may be dependent upon upgrading and enlarging the existing network.**

[The Shropshire Water Cycle Study \(2020\)](#) report includes the following statements:

- Section 4.4.3:

Severn Trent's WRMP forecasts a significant deficit between supply and demand for water, with a focus to prevent the risk of future environmental deterioration, meaning that alternative ways of meeting customer demand need to be found as current water sources become unreliable. The water company aims to do this by:

Therefore, capacity across the county has to be increased and / or demand reduced sufficiently to create the necessary headroom.

- Section 4.5.1:

Ironbridge power station – "Our initial assessments suggest that this site is located within an area in which surface water/groundwater bodies are at risk of deterioration under the Water Framework Directive if demand is to be met by increased abstraction from the environment. This may limit our ability to supply water." "To mitigate the risk

Therefore, there is a specific shortfall in capacity in the immediate environs of Much Wenlock.

- Section 5.1:

Introduction

An increase in water demand due to growth can exceed the hydraulic capacity of the existing supply infrastructure. This is likely to manifest itself as low pressure at times of high demand. An assessment is required to identify whether the existing infrastructure is adequate or whether upgrades will be required. The time required to plan, obtain funding and construct major pipeline works can be considerable and therefore water companies and planners need to work closely together to ensure that the infrastructure is able to meet growing demand.

Therefore, Shropshire Council do not have any understanding of the capacity shortfall, the capacity uplift required or the **solution** design or cost.

- Section 5.3:

Much Wenlock has experienced water supply issues recently with residents reporting low pressure, or intermittent supply. Severn Trent Water are aware of this issue. Network reinforcement is likely to be required if further development is planned in this supply area.

Therefore, the [Shropshire's Strategic Infrastructure and Investment Plan 2022](#) has a serious omission in that Much Wenlock & Ironbridge are not included as sensitive locations for water (Page 11 paragraph 2).

[The Shropshire Water Cycle Study \(2020\)](#) policy states it will approach new capacity requirements by ensuring new development conforms to current best practice i.e. minimising the water usage i.e. 110 litres per person. The Much Wenlock Neighbourhood Plan (MWNPN) states that the target should be 80 litres per person. The SLP makes no reference to this more stringent target.

Given the report commissioned by Shropshire Council states there is an existing issue, the above mitigation will not address the requirements without investment in

new infrastructure. This report is inadequate in that it does not define the scale of the issue and understates it by not referring to the specific water supply issues in the Ironbridge / Much Wenlock locality due to low pressure. This resulted in Severn Trent having to provide bottled water to residents in July 2018 for circa 3 days, and again subsequently.

Shropshire Council should restrict development in this locality, until the assessments recommended in 5.1 above have been undertaken. Note this risk has also been highlighted in [A0662 Telford & Wrekin Council](#) page 3 paragraph 2.

DP21. Flood Risk and DP22. Sustainable Drainage Systems:

- [A0347 Environment Agency](#) response:

<p>Much Wenlock</p> <p>MUW012VAR falls within SPZ2/3. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures will be required.</p>

The SLP only focuses on the specific drainage issues on the existing Much Wenlock Hunters Gate development and the new development site.

- [Shropshire's Strategic Infrastructure and Investment Plan 2022](#) : Waste Water Collection Network (page 31-33): confirms that there is an “evidence of need” for Much Wenlock, that the approach will be a Development Led Drainage Strategy and that there is committed funding from the developer. This is incorrect, as the sewerage and drainage solution to the Hunters Gate development has neither been proven nor agreed through consultation with the Town. The approach goes against the MWNP which factors in the impact on the rest of the town and on downstream settlements.

The SLP does not address the cross-border impact of drainage on the wider locality beyond Much Wenlock. Studies by local residents have clearly demonstrated the need for a drainage solution for the whole Town and downstream, and this is evidenced in the MWNP and noted at Matter 2.

3. Social Infrastructure

Healthcare Infrastructure:

Shropshire Council has been negligent in not assessing the cumulative impact of the proposed developments on the local healthcare infrastructure e.g. GP surgeries and / or hospitals. Specific evidence for consideration:

- The [A0669 - Midlands Partnership Foundation NHS Trust and Shropshire Community Health NHS Trust](#) submission bluntly states

There is also disappointment and concern, that there was no proactive engagement with the NHS Trusts by consultants, HDH Planning & Development Ltd, responsible for production of the 'Local Plan Delivery and Viability Study', July 2020. Without inclusion of

It goes on to say:

- **The 'Local Plan Delivery and Viability Study' be revised to include the estimated MPFT and SCHAT unmet infrastructure costs proportional to the scale of growth proposed in the Draft SLP within the study's policy modelling scenarios. This**

- Similarly, within the [A0662 Telford & Wrekin Council](#) response it states:

Infrastructure Provision

Given the scale of development proposed at the former Ironbridge Power Station and around Shifnal, the Shropshire Local Plan should appropriately acknowledge the cross boundary implications for Telford & Wrekin Council, including impacts on the Princess Royal Hospital in Telford which is the nearest accident and emergency hospital to both locations.

Education Infrastructure:

The Shropshire Local Plan suggests major developments at Ironbridge Power Station, Much Wenlock and Bridgnorth without addressing the impact on the local schools. The lack of joint consultation with representative bodies such as Much Wenlock Town Council, Bridgnorth Town Council and Telford & Wrekin Council increases the risk of infrastructure failure due to increased capacity requirements. This conclusion is shared in the response: [A0662 Telford & Wrekin Council](#) which states:

The Strategic Sites consultation document (July 2019) referenced the relationship between the former power station site and nearby settlements, including Telford; however, Policy S20 in the pre-submission draft plan makes no reference to Telford or to the site's location relative to Telford. The fact that it is a cross-boundary application, as both Shropshire Council and Telford & Wrekin Council are dealing with the planning applications, should be acknowledged in the policy wording or supporting text. This should include reference to the significant infrastructure impacts that will need to be addressed through developer contributions. This includes the estimated £6m package of developer contributions identified as required to mitigate the infrastructure impacts within Telford & Wrekin alone.

It goes on to say:

were not clear at the time of Local Plan preparation and examination. The impact of the development on secondary school capacity in Telford is a cross boundary issue and should be appropriately mitigated through the planning process.

4. Transport and Highways

It is clear that the draft plan does not take into account the strategic problems for highways and traffic (see Matter 7; S20). Shropshire Council is also not addressing local infrastructure for active travel through cycling and walking. Consultants 'City Science' in partnership with 'Civic Engineers' were commissioned (January 2022) by Shropshire Council to produce Shropshire's Local Cycling & Walking Infrastructure Plan (LCWIP) for investment in cycling and walking infrastructure. The LCWIP will cover all of Shropshire with a specific focus on the principal settlements.

MWTC asked why MW and other key centres were not included given the significant development being proposed. Their response: *"The geographical scope of the study is something that Shropshire Council set prior to our involvement so I have forwarded the comments on to them for consideration."* The TC has not been contacted by SC to discuss this further. There is clearly no intention by SC to develop local cycling and walking infrastructure for the key centres. This undermines assertions of sustainability and, given the risks of viability, the feasibility of the particular preferred site for MW.

With regard to the specific questions:

1. **What strategic infrastructure is necessary for the Local Plan (including saved sites) to be implemented? What is the likely cost? How will it be brought forward and funded?**

The infrastructure requirements of the locality are in large part unknown and therefore the likely cost is also unknown.

2. **What are the likely impacts of the proposed scale and distribution of development on the various aspects of infrastructure? How have these been assessed?**

There is demonstrable evidence to show that the level of building will result in:

- Intermittent loss of water supply
- Increased likelihood of flooding especially downstream of the new developments
- Shortfall in senior school places which is highly likely to impact infants and junior school places

- Pressure on health services both in terms of local GP Practices as well as A&E care

4. Shropshire's Strategic Infrastructure and Investment Plan 2022 includes a number projects that have funding gaps. Are these likely to affect the delivery of the Plan, including the saved sites), and if so how?

There are significant funding gaps which are likely to lead to:

- Shropshire Council failing to deliver educational needs
- Residents not receiving adequate health care
- Significant and more frequent environmental impacts such as flooding, effluent leaks and water shortages.

7. How will the provision of infrastructure be related in terms of timing/phasing to development proposals / areas?

In general, the SLP is proposing large scale immediate residential building. This will swamp the services. A more organic growth rate (as advocated in the MWNP) is more likely to be sustainable and prevent service failure. However even organic growth is likely to swamp the water supply and wastewater drainage systems which are inadequate for the current number of houses.

9. Are there effective mechanisms in place between the Council, other neighbouring authorities and infrastructure providers to co-ordinate the planning and provision of infrastructure?

No – as evidenced by:

- [A0662 Telford & Wrekin Council](#)
- [A0669 - Midlands Partnership Foundation NHS Trust and Shropshire Community Health NHS Trust](#)
- [A0071 Bridgnorth Town Council](#)

18. Within Shropshire's Strategic Infrastructure and Investment Plan 2022 there are some projects which rely on developer contributions. Have these been taken into account in the viability assessment?

The [Viability Study 2020](#) uses a parameterised model to assess the viability of the SLP. There are a number of cost assumptions in the model that are flawed e.g.

- Education costs – the model assumes standard DFE costs. In the case of Much Wenlock the senior school capacity cannot be easily increased as there is limited room for expansion, making any capacity changes more expensive.
- Site costs – the cost of development of the Much Wenlock site will be significantly higher due to the water drainage solution required. The model assumes SUDS which will be insufficient. The solution proposed by the developer has not been reviewed and agreed to be fit for purpose. Therefore the viability model will understate the cost considerably.
- There are a number of major infrastructure projects necessary for water, wastewater drainage etc. that do not have solution designs, are therefore not costed and cannot be assumed to be funded by CIL / Section 106.

5. Summary

The SLP section DP25 states:

- “New development should only take place where there is sufficient existing infrastructure capacity available.”
- “Where this is not the case the local plan states that CIL or Section 106 contributions will be used to fund the development of such infrastructure.”

The SLP and associated responses demonstrate:

- There is insufficient existing infrastructure capacity.
- The additional capacity required has not been quantified.
- In the majority of cases, a costed solution design has not been provided, in most cases abdicating this responsibility by saying it will be a “developer led” solution. In the few cases where information on developer proposals is provided e.g. Much Wenlock flooding, the proposed solutions are unlikely to address the local issue and will exacerbate the wider cross-boundary issues already experienced.

The current SLP exposes the local population to:

- Health risks: from flooding, intermittent freshwater supply, poor medical provisions
- Financial risks: from poorly estimated project costs and without adequately secured funding

The SLP should be suspended until effective consultation has taken place with local communities (MWNP) and key bodies e.g. the local NHS trust and Telford & Wrekin Council.