

7. Matter 8 – Infrastructure and delivery, monitoring and viability (policies SP1, SP2, SP14)

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref	A0410 – CPRE Shropshire
Matter	8 – Infrastructure and delivery, monitoring and viability (policies SP1, SP2, SP14)
Relevant question nos	6 in particular

7.1 The issue for Matter 8 is stated as:

Whether the approach to infrastructure delivery, implementation and monitoring is positively prepared, justified and consistent with national policy

7.2 The Main Modifications to policy DP28 that we proposed at the Regulation 19 stage:

DP28 Communications and Transport

15.7 *Some of this could be immediately deliverable through a minor wording change. Where large strategic developments are being built, with high trip levels of generation, they should include segregated cycle lanes, and planning policies should be explicit that this will be the expectation, with wording similar to the following:*

Major development shall incorporate or fund the provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure commensurate with the scale of development and trip generation and designed in accordance with Local Transport Note 1 / 20 - Cycle Infrastructure Design. Cycling is or will become mass transit and must be treated as such.

7.3 Shropshire Council's response in SD014.01, Schedule 2: Page 726 (electronic page 776) was:

Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations and businesses. Policy DP28 constructs the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well connected places. To

address limitations to achieving modal shifts in a rural County like Shropshire the Local Plan strategy is structured around the strategic transport corridors through the County and seeks to achieve a higher level of urban development. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options and advocates the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment. The need for further investment in the pedestrian and cycling networks is addressed in paragraph 4.252 which states "Developer contributions to improvements in our transport networks and infrastructure will be encouraged wherever possible, to increase the capacity, function and safety of our footways, cycleways, roads, rail and public transport networks".

7.4 This recognises the role of developer contributions in the implementation of transport infrastructure.

7.5 It is of note that the Local Transport Plan submitted for the Examination is LTP3 (document EV070) dated March 2011, covering the period 2011-2026. LTP4 has been consulted on but has not been submitted for Examination. There is therefore no Transport Plan in evidence covering the Local Plan period of 2016 – 2038.

7.6 Our Regulation 19 submission also recorded the more general concern amongst electors that infrastructure is not being implemented quickly enough to serve developments as they are actually built. This concern is much wider than just transport and includes, for instance, the provision of schools and medical facilities. These concerns were recorded as:

i) Page 75, paragraph 9, 3rd bullet point (part of Shropshire Council's summary of the responses to the Issues & Options consultation):

The provision of timely infrastructure was discussed in several responses, with respondents citing the difficulty in delivering new infrastructure, particularly with higher growth options.

ii) Page 77, final paragraph (part of Shropshire Council's commentary on the Preferred Options consultation):

Other respondents were concerned that the preferred approach did not reflect the views of the majority of respondents to the previous consultation and that there was inadequate infrastructure to meet demand from new development.

- iii) Page 78, 5th bullet point (part of Shropshire Council’s commentary on the Preferred Options consultation, recording the key issues raised by those respondents that did not support the proposed preferred approach):

Concern over the ability for infrastructure to meet the demands from new development. This was a consistent message coming from several respondents. Specific comments related to the need to support additional education, health, highway, public transport, rail and sports provision

- 7.7 This returns us to the stated issue for Matter 8, and particularly the questions of delivery and implementation. That leads on to Question 6 and the related subsequent questions.

Question 6

- 7.8 Question 6 under Matter 8 is:

Will the delivery of strategic infrastructure allow for the delivery of planned development in line with the submitted housing trajectory (examination document GC4p)? If not, what will be the shortcomings and how will the Council address these matters?

- 7.9 One of the chief sources of funding for infrastructure within Shropshire is the Community Infrastructure Levy (CIL). New Evidence document EV012, the Authority Monitoring Report (AMR) to 31 March 2020, records on page 90 that £36.7 million of CIL was collected from its inception in Shropshire in 2012 up to 31 March 2020. A Freedom of Information request (RFI # 3006), answered by Shropshire Council on 14 April 2022, showed that up to 31 March 2022 the total CIL collected was £52.4 million. At the time of the Regulation 19 consultation the latest AMR available was that to 31 March 2017, which showed (page 86) a total of £11.4 million of CIL collected up to 31 March 2017.
- 7.10 Appendix 2 shows our reconstruction of the figures in the 2020 AMR, and the 2022 FoI response. There are internal anomalies in the Council’s figures but it is clear that, whilst a lot of CIL has been collected, only a minority of it has actually been spent on the delivery of infrastructure.

7.11 In summary the figures available are, apparently:

Source	Total CIL collected (£m)	CIL allocated (£m)	CIL actually spent (£m)
AMR to 31/3/2017	11.4	2.1	0.1
AMR to 31/3/2020	36.7	17.9	2.9
FoI response to 31/3/2022	52.4	?	?

7.12 That apparently very low rate of spending casts doubt on the ability of Shropshire Council to deliver the infrastructure that should be in place to support the development in the Draft Plan.

North West Relief Road and Matter 1 question 11

7.13 The major proposed piece of infrastructure in the county is the North West Relief Road, the subject of planning application 21/00924/EIA, submitted on 20 February 2021, in the last week of the Regulation 19 consultation. There is no question about it under Matter 8 but it is referred to in Question 11 under Matter 1, namely:

The proposal for the North-West Relief Road (NWRR) is not a specific allocation in the Local Plan and is subject to separate HRA process. What is the latest position on the planning application for this project? Does the Local Plan rely upon the NWRR to deliver sites allocated in it?

7.14 Our understanding is that the latest position on the planning application for the NWRR is that:

- i) There were 4,782 objections and 209 supporting comments on the application website at 25 May 2022⁹ (see <https://pa.shropshire.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=QOXI5QTD06Z00>) This represents an astonishing level of opposition, with objections centring on the greenhouse gas emissions and environmental damage of the scheme.

⁹ Access to the online systems for planning applications was restricted within the last week of the window for submitting hearing statements, in line with the following notice on the relevant webpage:

The systems used to process applications will be upgraded, including the database that the data is held in, between 5pm on Friday 27th May 2022 to 9am on Tuesday 31st May 2022. During the upgrade the Public Access Planning Online Register system will be unable to read the data live as the database will be offline. If you intend to make comments at that time, you may wish to do this before the above dates. Please accept our apologies for any inconvenience.

- ii) Significant doubt is also being registered as to the possibly prohibitive costs of the scheme, in view of the rising cost of construction materials and comparative costs of other recently costed road schemes, compared with the now outdated costs in the Outline Business Case, which remains the main statement of costs in the public domain.

7.15 The allocation of site SHR173 west of Ellesmere Road, Shrewsbury for 450 houses is stated in policy S16 to be directly dependent on the approval and construction of the North West Relief Road; development on the site will not commence until such time as the North West Relief Road is operational.

7.16 There therefore remains significant doubt as to whether the project will be delivered.

Appendix 2: CIL figures

<i>Summary of Infrastructure Allocated CIL Funding and Delivered using CIL Funding Ongoing</i>						
Location	Infrastructure Project	Date of commencement	Total CIL allocations	Status	Date of completion	CIL spend as of 31/03/2020 in £
Strategic Fund						
Whitchurch	Whitchurch Medical Practice	2020/21	490,000.00	On-going		15,101.00
Shifnal	Shifnal Integrated Transport Plan	N/A	332,474.00	On-going		
			822,474.00			15,101.00
Local Fund						
Shifnal	Shifnal St Andrew 2 Class Extension	2019/20	636,022.00	On-going		448,244.00
Shifnal	Shifnal Primary 2 Class Extension	2019/20	115,001.00	On-going		102,729.00
Hadnall	Hadnall Primary 1 Class Extension	2019/20	372,268.00	On-going		315,228.00
Whitchurch	Whitchurch Junior - 2 Class Extension & Refurbishment	2019/20	590,000.00	On-going		10% Strategic 90% Local
Shrewbury	Shrewbury Integrated Transport Package and A5 Junction improvements	N/A	2,000,000.00	On-going		256,003.00
Shrewbury	Oxan Link Road (OLR)	N/A	300,000.00	On-going		-
Shrewbury	Shrewbury School Place Planning	N/A	5,950,000.00	On-going		10% Strategic 90% Local
Oruortry	Oruortry Network Improvement Mile End	N/A	2,192,487.00	On-going		10% Strategic 90% Local
Shifnal	Shifnal Integrated Transport Plan	N/A	1,605,460.00	On-going		10% Strategic 90% Local
Braroley	Birch Meadow Park Drainage Scheme	N/A	76,350.00	On-going		10% Strategic 90% Local
Whitchurch	Whitchurch South Faul Drainage Improvement Scheme	N/A	900,000.00	On-going		10% Strategic 90% Local
N/A	IT - Approved EOL funding allocated to Technical Checker in multiple Place Plan areas	N/A	1,006,038.00	On-going		10% Strategic 90% Local
Clive Parish	Ranham Field, Clive	2014	82,000.00	Completed	2014	11,500.00
Claverley Parish	Provision of road streetlights in Claverley	2015	5,560.20	Completed	2015	2,359.80
Church Stretton	Replacement of Ruzler Meadow Sports Pavilion	2016		Completed	2017	23,538.00
Haperoy	Provision of all-weather track	2017		Completed	2018	5,834.00
Candover Parish	Multi Use Games Area at Darrington	2017	54,452.00	Completed	2018	45,000.00
Barchurch	Barchurch CE Primary Classroom Expansion	2018	TBC	Ongoing	TBC	19,982.00
Hadnall	Hadnall CE Primary Classroom Expansion	2018	TBC	Ongoing	TBC	24,549.00
Shifnal	Shifnal Primary Classroom Expansion	2018	TBC	Ongoing	TBC	635,782.00
Market Drayton	Market Drayton Infant - Place Planning	2019	80,000.00	Completed	2020	80,000.00
Market Drayton	Market Drayton Junior - Place Planning	2019	20,000.00	Completed	2020	20,000.00
Shrewbury	Barchurch Primary 1 Class Extension	2019	334,826.00	Completed	2020	334,826.00
			16,320,464.20			2,325,621.80
Neighbourhood Fund						
Shifnal Parish	Erection of MUGA style equipment	2015	12,713.00	Completed	2015	12,713.00
Minsterley Parish	Scout funding, Minsterley	2015	105.00	Completed	2016	105.00
Great Ness & Little Ness	Contribution to extension of Little Ness Car Park	2016	1,800.93	Completed	2016	1,800.93
Baumers Heath	New cricket net - Baumers Heath Cricket Club	2016	5,000.00	Completed	2016	5,000.00
Llanymynech and Pant	Play area refurbishment at Badger Green, Skates ramp refurbishment, lighting improvements and litter bin	2016	10,993.00	Completed	2016	10,993.00
Farlow	Enlarging & resurfacing car park near Village Hall	2016	1,191.68	Completed	2016	1,191.68
Narbury	Levelling & resurfacing of Narbury Village Hall car park	2016	451.32	Completed	2016	451.32
Stoke upon Tern	Community street lighting	2016	393.63	Completed	2016	393.63
Upton Magna	Architectural plan for prepared car park	2016	325.00	Completed	2016	325.00
Church Stretton	Replacement of Ruzler Meadow Sports Pavilion	2016	178,138.00	Completed	2017	3,609.50
Adderley	Replacement of 3 wooden benches	2016	1,026.00	Completed	2017	1,026.00
Oruortry Rural	Maintenance & improvements to Trefarclaudd Cemetery	2017	2,120.31	Completed	2017	2,120.31
Upton Magna	Launmauer purchase for maintenance of graveyard	2017	773.40	Completed	2017	773.40
Haperoy	Provision of all-weather track	2017	8,326.00	Completed	2018	300.00
Braroley	Birchmeadow Park Drainage Phase 1	2017	9,850.00	Completed	2018	9,850.00
Barchurch	Upgrade of street lighting	2018	6,941.00	Completed	2019	6,941.00
Barchurch	Refurbishment of Bur Shelter	2018	1,273.00	Completed	2019	1,273.00
Stanton Lacy	Installation of Broadband dish on village hall	2018	117.00	Completed	2019	117.00
Upton Magna	Graveyard roadside wall repair (part)	2018	2,350.00	Completed	2018	2,350.00
Wolverhampton & Lyneal	Street lighting conversion to LED	2018	406.00	Completed	2018	406.00
Whittington	Upgrade of street lighting - LED conversion	2018	8,531.00	Completed	2018	8,531.00
Adderley	Safe route sign, Village information board	2019	3,045.00	Completed	2020	3,045.00
Artley Abbatt	Speed indicator devices fitted	2019	976.34	Completed	2020	976.34
Barrow	Renovation of Flayor Lane allotment site	2019	950.59	Completed	2020	950.59
Barchurch	Speed sign & associated equipment, litter bin in community area, Cemetery memorial benches and plant	2019	26,418.98	Completed	2020	26,418.98
Baumers Heath	Re-flooring Fitz Village Hall	2019	4,000.00	Completed	2020	4,000.00
Ellersmere Rural	Defibrillator, Street lighting upgrade, Roof repairs	2019	23,406.88	Completed	2020	23,406.88
Kinnerley	Vehicle Activated Speed sign at Moorbank	2019	5,988.00	Completed	2020	5,988.00
Haperoy	Arbor Tree enclosure project	2019	2,216.69	Completed	2020	2,216.69
Much Wenlock	Drainage works Garkill Recreation Ground	2019	5,601.24	Completed	2020	5,601.24
Munclau	Resurface village car park, VAS speed sign, Replace Community notice board	2019	946.00	Completed	2020	946.00
Middle, Braughton &	LED lighting upgrade on all PC named streetlights	2019	12,844.90	Completed	2020	12,844.90
Oruortry Rural	Street lighting upgrade	2019	1,501.02	Completed	2020	1,501.02
Shrewbury	Contribution to Mank Place Area turf, LED street lighting upgrade, Pitch improvement Rodbrook Rd	2019	154,408.00	Completed	2020	154,408.00
Stanton Lacy	Re-wiring of bur shelter, new bars and window	2019	491.43	Completed	2020	491.43
Stoke Upon Tern	Street lighting upgrade, improvement to amenity site and building, Continued improvement to cemetery	2019	7,336.02	Completed	2020	7,336.02
Wolverhampton & Lyneal	Complete street lighting conversion, Traffic calming Whitegate, VAS sign, Replacement bur shelter	2019	9,162.87	Completed	2020	9,162.87
Wom Rural	New notice board	2019	348.02	Completed	2020	348.02
Wort Filton	Installation of new street lighting	2019	5,490.12	Completed	2020	5,490.12
Whittington	LED upgrade of street lighting	2019	5,528.03	Completed	2020	5,528.03
			523,993.16			340,928.66
Payment in kind						
Shaunbury	A53 Roundabout	2017	272,115.00	Completed	2018	272,115.00
Total			17,929,046.36			2,953,766.46