



Edward West
Planning Policy & Strategy
Manager,
Shropshire Council,
Shirehall,
Shrewsbury



Date: 24.02.21

Our ref:

Your Ref:

Dear Eddie,

Regulation 19 pre-submission draft Local Plan - Response from Telford & Wrekin Council

Telford & Wrekin Council welcome the opportunity to comment on the pre-submission draft of the Shropshire Local Plan which closes on 26 February 2021.

The views reflected in this letter represent those of officers based on a technical appraisal of the policies and site allocations included in the pre-submission draft.

The Shropshire Local Plan contains several strategic and non-strategic policies together with site allocations. Telford & Wrekin Council support the aims and direction of the gateway 'Shropshire Test' Policy SP1 which sets out several priorities that new development should address. This includes supporting cohesive communities, mitigating the impacts of climate change and promoting green and blue infrastructure networks among other issues. In this regard Policy SP1 contributes to a positively prepared Local Plan.

The provision of sufficient infrastructure from development proposals is also referenced in the Shropshire Test and this is of particular interest to Telford & Wrekin Council, under the Duty to Cooperate. Development proposals in locations within close proximity to Telford & Wrekin Council need to be considered on a cross-boundary basis given the infrastructure implications. Reference is made below to site allocations and the cross-boundary implications of those proposals.

Former Ironbridge Power Station

Telford & Wrekin Council has previously commented on the proposed site allocation at the former Ironbridge Power Station. The response highlighted issues arising from the proposal including transport infrastructure in and around Ironbridge and the wider Telford area including the M54, the impact of development on the setting of the World Heritage Site (including buffering and screening of the site from Ironbridge), health and education provision and seeking clarification on Shropshire Council's aspirations for redevelopment of the site. It is also acknowledged that planning applications have since been submitted for redevelopment of the site, including mineral extraction followed by the provision of a mixed use scheme. Policy S20 in the pre-submission Local Plan sets out criteria for assessing development proposals at the former Ironbridge Power Station.

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.

The need to reflect this position in Policy S20 is further reinforced by Policy DP25 which requires new development, which would lead to a shortfall in infrastructure provision, to fund necessary improvements through a suitable developer contribution (unless addressed by other means). As an example, the proposed scale of development will impact on the capacity of secondary education provision in Telford & Wrekin. This is an immediate pressure arising from the development proposal which could not have been factored into preparation of the existing Telford & Wrekin Local Plan because the power station proposals 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.

Policy DP25 is clear that development proposals should address any shortfalls in infrastructure provision. Consequently, there should be a clear reference in Policy S20 that infrastructure shortfalls arising from development of the former Ironbridge Power Station would be addressed by Shropshire Council. The link between Policies DP25 and S20 should be strengthened.

Shifnal Place Plan Area

The Council has previously identified the highways impacts arising from development in the Shifnal area, including the potential impacts on Junctions 3 and 4 of the M54. Several allocations are proposed around Shifnal including employment land east of Shifnal Industrial Estate (SHF018b & SHF018d). The development guidelines for this allocation states that transport assessment and evidence will be required at application stage to assess the effects of the development and the cumulative growth of Shifnal on the local and strategic road network, including M54 Junction 3 and the A41/Stanton Road junction.

Given the scale of development proposed and the additional safeguarding of approximately 93 ha of land around Shifnal for future development, evidence should be provided to demonstrate, through discussions with Highways England, that the strategic transport impacts on Junctions 3 and 4 of the M54 have been considered and appropriately addressed. There should be a mechanism to capture the impacts of growth around Shifnal for future improvements to these junctions. If the evidence concludes there is no spare

capacity to meet the impact of the proposed development, clarification should be provided in the Local Plan or infrastructure planning evidence that contributions would be collected towards strategic highways infrastructure works.

The Council also previously identified the potential impacts on cross boundary water resource infrastructure as a result of proposed site allocations. Shropshire Council's Water Cycle Study (July 2020) concludes in section 5.3 that Severn Trent have advised that water supply could potentially be an issue for sites in Albrighton, Shifnal and the RAF Cosford strategic employment site and that water may need to be transferred into the catchment to supply this growth without increasing local abstraction (table 14.2). The strategic implications of these findings for Telford & Wrekin Council are unclear. Clarification should therefore be provided through the relevant Local Plan policies (Policy S15 Shifnal Place Plan Area and Policy DP25 Infrastructure Provision) and supported by evidence of engagement with the Environment Agency and Severn Trent Water.

The Council are also interested in understand in the impact of development proposed within the plan on secondary school provision. There has been substantial levels of growth in Shifnal and with further growth in the plan the Council are concerned about the level of secondary provision whether this can meet existing needs as well as future needs through planned growth. We would welcome further information on secondary provision for Shifnal area.

Clive Barracks, Tern Hill

The Council previously commented on the proposed site allocation and recognises the benefits of regenerating a large previously developed site. The approach in Policy S19 requires a comprehensive masterplan to be adopted by Shropshire Council, it is assumed prior to the submission of an application for planning permission. On this basis Policy S19 should reference Policy DP25 and recognise the cross boundary infrastructure implications, notably the highways impact along the A41 towards Newport and also Junction 3 of the M54. Clarification is still required on the long term use of the adjacent airfield at RAF Ternhill given that further development in this location beyond that set out in Policy S19 could have significant cross-boundary infrastructure impacts.

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. The Shropshire Strategic Infrastructure Implementation Plan (December 2020) refers to GP and primary care provision in Shrewsbury but does not consider the impacts on the Princess Royal Hospital of development adjacent to or east of Telford. Clarification of discussions with

the Clinical Commissioning Group should be provided to ensure that the development impacts have been considered for this important cross-boundary service; any identified impacts should be acknowledged in the respective Local Plan policies.

Conclusion

In conclusion Telford & Wrekin Council welcomes the opportunity to comment on Shropshire Council's pre-submission Local Plan and supports the aims and direction of the gateway 'Shropshire Test' Policy SP1 which recognises the importance of cohesive communities, mitigating the impacts of climate change and promoting green and blue infrastructure networks among other issues. However this response has identified several cross-boundary strategic matters with infrastructure implications and the mechanism for securing developer contributions towards those infrastructure works should be recognised in the Shropshire Local Plan. The Local Plan should clearly state that contributions towards cross-boundary infrastructure will be supported. This could be secured from site-specific allocations via the aforementioned policies in those locations. Regulation 59 (3) of the Community Infrastructure Levy Regulations 2010 allows Shropshire Council to apply CIL towards funding infrastructure outside its area where to do so would support development in its area.

Telford & Wrekin Council would be happy to discuss the issues raised in this response and will continue to engage with Shropshire Council on strategic cross-boundary matters as part of the duty to cooperate. We will work with Shropshire Council to document this joint working and how these issues could be addressed successfully through the preparation of a statement of common ground.

Yours sincerely,

Gavin Ashford
Strategic Planning Team Leader