

**Shropshire Council  
Local Plan 2016 -2038**

**Statement of  
Common Ground between**

**Dwr Cymru Welsh Water Ltd  
and  
Shropshire Council**

**June 2021**

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## 1. Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between Shropshire Council (SC) and Dwr Cymru Welsh Water (DCWW) to demonstrate that the water infrastructure network has sufficient capacity to accommodate the housing and employment growth set out in the Shropshire Local Plan 2016-2038.
- 1.2 This document summarises the findings of the Shropshire Water Cycle Study (WCS) (prepared for SC by JBA Consulting in 2020 with an Addendum and Erratum in 2021) and confirms DCWW's commitment to implementing the actions identified in the WCS.

## 2. Background

- 2.1 The current Local Plan for Shropshire comprises the Core Strategy (2011) and the Site Allocations and Management of Development document (2015), together with the adopted Neighbourhood Plans for Much Wenlock and Shifnal. These documents allocate land for employment and housing and set out development management policies for the period 2006 -2026.
- 2.2 Local Planning Authorities are required to keep under review, any matters that might affect the development of their area. Changes to numbers of houses needed in Shropshire and to national planning policy mean that the Council is now updating the Local Plan.
- 2.3 The new Local Plan covers the period 2026-2038 and has been prepared in several iterative stages:
  - Issues and Options;
  - Preferred Scale and Distribution of Development:
  - Preferred Sites;
  - Preferred Strategic Sites:
  - Regulation 18 Pre-Submission Draft
  - Regulation 19 Pre-Submission Draft.
- 2.4 The Council has a large amount of information to support the Local Plan, with much of this becoming available at the Regulation 18 stage. This evidence base includes an assessment of the constraints and requirements for the water infrastructure network that are likely to arise from the level and location of housing and employment land proposed by the Plan.
- 2.5 New homes and businesses require the provision of clean water, the safe disposal of wastewater and protection from flooding (the latter is covered in more detail in the Strategic Flood Risk Assessments Levels 1 and 2). New housing and employment land could potentially exceed the current capacity of the existing water infrastructure network. This may cause service failure to water and wastewater customers as well as adverse environmental impacts and may mean that additional costs for infrastructure upgrades are passed on to the bill payer.
- 2.6 SC commissioned a Water Cycle Study from JBA Consulting to assess the constraints on Shropshire's water infrastructure and to set out any requirements that might arise from the employment and housing land growth proposed by the new Local Plan. The WCS also assessed the impact of climate change – increased heavy rainfall events, higher frequency of droughts etc – on the water network.

- 2.7 The WCS was prepared with the co-operation of the water companies in Shropshire: Severn Trent Water (STW); United Utilities (UU); Dwr Cymru Welsh Water (DCWW); as well as the Environment Agency and neighbouring Local Planning Authorities.

### 3. Results of the Water Cycle Study

- 3.1 The WCS assesses the impact of development on the following matters:
- Water resources and water supply
  - Water supply infrastructure
  - Wastewater collection infrastructure
  - Wastewater treatment capacity
  - Odour
  - Water quality
  - Flood risk from increased wastewater treatment works (WwTW) discharge
  - Environmental constraints and opportunities.
- 3.2 Dwr Cymru Welsh Water do not supply water to any of the growth areas identified in the Local Plan and the WCS considers that odour issues are restricted to one site in Shrewsbury in STW's area. These matters are thus not covered in this SoCG. The WCS assessments and associated recommended actions for each of the other matters are summarised below.

#### Wastewater collection infrastructure

- 3.3 DCWW and STW provide wastewater services for the proposed site allocations. The companies provided a red/amber/green (RAG) assessment for the sewer network for each site allocation. These are summarised in table 6.1 of the WCS:

**WCS Table 6.1 Foul sewerage network assessment results**

Strategic site	Sewerage undertaker	Overall RAG assessment	Total potential number of houses	Total potential number of employees
RAF Cosford	Severn Trent	Red	682	Unknown
Clive Barracks		Red	750	329
Ironbridge		Red	1,000	343
Settlement	Sewerage undertaker	Overall RAG assessment	Total potential number of houses	Total potential number of employees
Albrighton	Severn Trent	Red	180	0
Alveley	Severn Trent	Green	70	0
Baschurch	Severn Trent	Red	55	0
Bayston Hill	Severn Trent	Red	147	0
Bicton	Severn Trent	Not assessed	15	0
Bishop's Castle	Severn Trent	Red	45	0
Bomere Heath	Severn Trent	Red	55	0
Bridgnorth	Severn Trent	Red	1,050	1,566
Bucknell	Severn Trent	Red	20	0

Chirbury	Severn Trent	Not assessed	7	0
Church Stretton	Severn Trent	Red	70	0
Clee Hill	Severn Trent	Amber	20	0
Clive	Severn Trent	Green	20	0
Clun	Severn Trent	Green	20	0
Cressage	Severn Trent	Green	64	0
Cross Houses	Severn Trent	Green	40	0
Ditton Priors	Severn Trent	Red	40	0
Dudleston Heath	Severn Trent	Amber	60	0
Ellesmere	Severn Trent	Amber	170	0
Ford	Severn Trent	Red	75	0
Gobowen	Severn Trent	Red	25	0
Hadnall	Severn Trent	Green	40	0
Highley	Severn Trent	Amber	120	0
Hinstock	Severn Trent	Green	35	0
Hodnet	Severn Trent	Amber	40	0
Knockin	Severn Trent	Amber	25	0
Llanymynech	Severn Trent	Green	50	0
Ludlow	Severn Trent	Red	254	286
Market Drayton	Severn Trent	Amber	435	0
Minsterley	Severn Trent	Green	20	0
Much Wenlock	Severn Trent	Amber	120	0
Oswestry	Severn Trent	Green	30	0
Pant	Severn Trent	Amber	45	0
Park Hall	Severn Trent	Green	260	0
Pontesbury	Severn Trent	Red	40	0
Prees	Severn Trent	Green	35	0
Ruyton XI Towns	Severn Trent	Green	65	0
Shawbury	Severn Trent	Green	80	0
Shifnal	Severn Trent	Red	220	2,180
Shrewsbury	Severn Trent	Red	2,510	7,304
St Martins	Dwr Cymru Welsh Water	Green	95	0
Wem	Severn Trent	Green	210	0
West Felton	Severn Trent	Amber	60	0
Weston Rhyn	Dwr Cymru Welsh Water	Amber	100	0
Whitchurch	Dwr Cymru Welsh Water	Amber	450	0
Whittington	Severn Trent	Green	70	0
Worthen	Severn Trent	Green	45	0

- 3.4 This shows that upgrades will be required to the wastewater collection network in order to serve the proposed growth in a number of settlements. Sewerage Undertakers have a duty under Section 94 of the Water Industry Act 1991 to provide sewerage and treat wastewater arising from new domestic development. Except where strategic upgrades are required to serve very large or multiple developments, infrastructure upgrades are usually only implemented following an application for a connection, adoption, or requisition from a developer. Early developer engagement with water companies at the planning application stage is therefore essential to ensure that sewerage capacity can be provided without delaying development.
- 3.5 The WCS recommends various actions for SC and DCWW with respect to the waste water collection network. These are given in WCS table 6.2 as follows:

**WCS Table 6.2 Recommendations from wastewater network assessment**

Action	Responsibility	Timescale
Early engagement between the SC and STW and DCWW is required to ensure that where strategic infrastructure is required, it can be planned in by STW/DCWW.	SC STW DCWW	Ongoing
Take into account wastewater infrastructure constraints in phasing development in partnership with the sewerage undertaker	SC STW DCWW	Ongoing
Developers will be expected to work with the sewerage undertaker closely and early in the planning promotion process to develop an outline Drainage Strategy for sites. The Outline Drainage strategy should set out the following:  What – What is required to serve the site  Where – Where are the assets / upgrades to be located  When – When are the assets to be delivered (phasing)  Which – Which delivery route is the developer going to use s104 s98 s106 etc. The Outline Drainage Strategy should be submitted as part of the planning application submission, and where required, used as a basis for a drainage planning condition to be set.	STW, DCWW and Developers	Ongoing
Developers will be expected to demonstrate to the Lead Local Flood Authority (LLFA) that surface water from a site will be disposed using a sustainable drainage system (SuDS) with connection to surface water sewers seen as the last option. New connections for surface water to foul sewers will be resisted by the LLFA.	Developers LLFA	Ongoing

Note: Shropshire Council is the Lead Local Flood Authority (LLFA).

### **Wastewater treatment capacity**

- 3.6 DCWW, STW and UU all operate wastewater treatment works (WwTW) within Shropshire, but only DCWW and STW operate works which serve the proposed allocations. Three wastewater treatment works outside Shropshire (Coalport, Five Fords and Tenbury) serve growth within the county.
- 3.7 DCWW and STW provided assessments of their WwTW for the site allocations proposed. These were based on hydraulic capacity and headroom in the environmental permit. JBA performed a flow permit assessment in parallel to this. Table 7.2 in the WCS summarises the results:

**WCS Table 7.2 Summary of WwTW flow assessment**

WwTW	Areas served by WwTW	Proposed growth over Local Plan period*	RAG	Sewerage company comments	Does DWF flow exceed permitted flow before 2045? (JBA assessment)
Albrighton	Albrighton, Tong, Tong Norton	4,181 houses 220,000m <sup>2</sup> employment space	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes between 2025 and 2030
Alveley	Alveley	126 houses	Green		No
Baschurch	Baschurch, Little Ness, Yeaton, Walford, Walford Heath, Prescott, Myddle, Harmer Hill, Stanwardine in the Fields, Westoncommon, Westonwharf, Weston Lullingfields, Petton, Burlton, Cockshutt	437 houses	Amber		Yes – reaches maximum permitted DWF around 2035
Bishops Castle	Bishops Castle	136 houses 10,400m <sup>2</sup> employment space	Black	AMP7 quality upgrade scheme planned - may address some capacity pressures. Site subject to nutrient management plan - any growth above DWF would require mitigation of increased phosphorus loads.	Yes – reaches maximum permitted DWF around 2035
Bomere Heath	Bomere Heath	116 houses	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No
Bridgnorth – Slads	Bridgnorth, Stanmore, Eardington	1,695 houses 142,400m <sup>2</sup> employment space	Amber	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes between 2025 and 2030
Brompton-Cross Houses	Brompton, Cross Houses	91 houses	Green		No



<b>WwTW</b>	<b>Areas served by WwTW</b>	<b>Proposed growth over Local Plan period*</b>	<b>RAG</b>	<b>Sewerage company comments</b>	<b>Does DWF flow exceed permitted flow before 2045? (JBA assessment)</b>
Bucknell	Bucknell, Bedstone	100 houses 5,600m <sup>2</sup> employment space	Green	Site subject to nutrient management plan - any growth above DWF would require mitigation of increased phosphorus loads.	No
Chirbury	Chirbury	46 houses	Amber	No flow monitoring - observed 80%ile is theoretical	Yes - already exceeding maximum permitted, however observed flow is theoretical
Church Stretton	Church Stretton, Little Stretton, All Stretton, Hope Boulder	217 houses 13,200m <sup>2</sup> employment space	Green		No
Cleobury Mortimer	Cleobury Mortimer	204 houses 6,000m <sup>2</sup> employment space	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes - already exceeding maximum permitted
Clive	Clive, Grinshill, Yorton	43 houses	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No
Clun	Clun	92 houses	Green	Site subject to nutrient management plan - any growth above DWF would require mitigation of increased phosphorus loads.	No
Coalport	Broseley	7,782 houses 273,514m <sup>2</sup> employment space	Amber	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes - between 2020 and 2025
Coreley - Clee Hill	Cleehill, Knowle, Brookrow, Hints	82 houses	Red		Yes
Craven Arms	Craven Arms, Stokesay, The Grove, Winstanston	472 houses 56,000m <sup>2</sup> employment space	Green		No
Cressage	Cressage	79 houses	Green		No

<b>WwTW</b>	<b>Areas served by WwTW</b>	<b>Proposed growth over Local Plan period*</b>	<b>RAG</b>	<b>Sewerage company comments</b>	<b>Does DWF flow exceed permitted flow before 2045? (JBA assessment)</b>
Ditton Priors	Ditton Priors	67 houses	Red		Yes – already exceeding maximum permitted
Dorrington	Dorrington	145 houses	Green		No
Drenewydd – Oswestry	Babbinswood, Whittington, Park Hall, Twmpath, Gobowen, Rhewl	845 houses 8,000m <sup>2</sup> employment space	Green	AMP6 quality upgrade scheme planned - may address some capacity pressures.	No
Dudleston Heath	Dudleston Heath	100	Amber	AMP6 quality upgrade scheme planned - may address some capacity pressures.	Yes – reaches maximum permitted DWF around 2035
Ellesmere	Ellesmere, Tetchill	811 houses 36,800m <sup>2</sup> employment space	Green	AMP6 quality upgrade scheme planned - may address some capacity pressures.	No
Five Fords	Weston Rhyn, Rhoswiell, Chirk Bank, St Martins, Ifton Heath, Preesgweene, Wern, Selattyn	586 houses	Green	There is capacity available at Five Fords WwTW	No
Ford	Ford, Shoot Hill, Cardeston, Albebury, Rowton, Westbury, Halfway House, Wattlesborough Heath	186 houses	Green		No
Higher Heath-Prees	Prees, Fauls, Darliston, Prees Higher Heath	339 houses	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes – already exceeding permitted flow
Highley	Highley, Wood Hill, Chelmarsh	201 houses 4,000m <sup>2</sup> employment space	Green		No

WwTW	Areas served by WwTW	Proposed growth over Local Plan period*	RAG	Sewerage company comments	Does DWF flow exceed permitted flow before 2045? (JBA assessment)
Hinstock	Hinstock	157 houses	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes - already exceeding permitted flow
Hodnet	Hodnet	110 houses	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No
Kinnerley	Kinnerley	63 houses	Green		No
Knockin	Knockin	55 houses	Amber	No flow monitoring - observed 80%ile is theoretical	No
Ludlow	Ludlow, Sheet	1,136 houses 44,000m <sup>2</sup> employment space	Red		Yes - already exceeding permitted flow
Market Drayton	Market Drayton	1,006 houses 48,000m <sup>2</sup> employment space	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No
Mile Oak	Oswestry, Morda, Weston, Trefonen, Treflach, Maesbury Marsh	1,822 houses 148,000m <sup>2</sup> employment space	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes - already exceeding permitted flow
Minsterley	Minsterley, Ploxgreen, Ladyoak, Wagbeach, Horsebridge, Asterley	141 houses 560m <sup>2</sup> employment space	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No
Monkmoor	Shrewsbury, Bayston Hill, Longden, Lyth Bank, Hanwood, Calcott, Bicton, Hadnall, Astley, Bings Heath, Uffington, Upton Magna, Withington	8,145 houses 604,520m <sup>2</sup> employment space	Amber	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Reaching capacity after 2035
Much Wenlock	Much Wenlock	190 houses	Green		No

<b>WwTW</b>	<b>Areas served by WwTW</b>	<b>Proposed growth over Local Plan period*</b>	<b>RAG</b>	<b>Sewerage company comments</b>	<b>Does DWF flow exceed permitted flow before 2045? (JBA assessment)</b>
		4,400m <sup>2</sup> employment space			
Nesscliffe - Wilcot	Nesscliffe, Wilcott	155 houses	Green		No
Pant-Plas Cerrig	Pant, Llanymynech	269 houses	Green		Yes - after 2035
Pontesbury	Pontesbury, Polesgate	178 houses	Amber	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes around 2034
Ruyton XI Towns	Ruyton-XI-Towns	116 houses	Green		No
Shawbury	Shawbury, Moreton Corbet, Stanton upon Hine Heath, The Groves, Edgebolton	196 houses	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No
Shifnal	Shifnal, Sheriffhales, Kemberton	1,914 houses 160,600m <sup>2</sup> employment space	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes - already exceeding permitted flow
Stoke Heath	Ternhill	820 houses 23,000m <sup>2</sup> employment space	Amber	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Reaching capacity at 2045
Tenbury	Burford	167 houses	Green		No
Wem - Aston Road	Wem	534 houses 24,000m <sup>2</sup> employment space	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes - before 2020
West Felton	West Felton	112 houses	Red	AMP7 quality upgrade scheme planned - may address some capacity pressures.	Yes - before 2020
Whitchurch	Whitchurch	1,532 houses 78,000m <sup>2</sup> employment space	Amber	A scheme to deliver improvements at Whitchurch WwTW is to be	Yes - around 2020

WwTW	Areas served by WwTW	Proposed growth over Local Plan period*	RAG	Sewerage company comments	Does DWF flow exceed permitted flow before 2045? (JBA assessment)
				undertaken in the investment period AMP7 (2020-2025)	
Woore	Woore, Dorrington, Pipe Gate, Ireland's Cross	91 houses	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No
Worthen	Worthen, Brockton, Aston Pigott, Aston Rogers, Binweston, Marton	63 houses	Green	AMP7 quality upgrade scheme planned - may address some capacity pressures.	No

\*includes preferred options, strategic sites, commitments, recent completions, windfall and neighbouring authority growth

- 3.8 Two of DCWW's treatment works (Five Fords and Whitchurch) serve proposed growth in St Martins, Weston Rhyn and Whitchurch. The WCS rates Five Fords as green and Whitchurch as amber, but upgrades are planned at Whitchurch between 2020 and 2025 to alleviate capacity issues. DCWW's responses to the Regulation 19 Pre-Submission Draft Local Plan consultation (Appendix A) confirm that both these WwTW can accommodate the foul flows from these settlements.
- 3.9 The WCS recommends various actions for SC and DCWW with respect to wastewater treatment. These are given in WCS table 7.3 as follows:

**WCS Table 7.3 Recommendations for wastewater treatment**

Action	Responsibility	Timescale
Early engagement with STW and DCWW is required to ensure that provision of WwTW capacity is aligned with delivery of development.	SC STW, DCWW	Ongoing
Provide Annual Monitoring Reports to STW and DCWW detailing projected housing growth.	SC	Ongoing
STW and DCWW to assess growth demands as part of their wastewater asset planning activities and feedback to the Council if concerns arise.	STW, DCWW SC	Ongoing

### **Water Quality**

- 3.10 The WCS Erratum corrects sections 9.6 to 9.8 9 of the WCS and should be referred to for water quality issues.
- 3.11 The WCS carried out water quality modelling to identify areas at risk of deterioration. The risk of deterioration was determined through the application of two tests;
- Could the development cause a greater than 10% deterioration in water quality for ammonia and phosphate?
  - Could the development cause a deterioration in Water Framework Directive class of any element?
- A third test then looked at whether improvements in treatment processes would be capable of removing any projected deterioration. This was simulated by setting every WwTW to treat at the technically achievable limit (TAL).
- 3.12 Table 9.3 in the WCS shows which treatment works are able to accommodate the levels of development proposed in the Local Plan without a deterioration in water quality.

**WCS Table 9.3 WwTW with environmental capacity**

<b>Wastewater Treatment Works</b>		
Acton Burnell	Five Fords (Assessed with RQP)	Pant Plas Cerig
Ashton Carbonell	Ford	Picklescott
Aston near Wem	Frankton	Pontesbury
Aston-on-Clun	High Hatton	Prees - Hill
Beckbury	Hilton Stratford Lane	Seifton
Bedlem	Homer	Shawbury
Bitterley-Orchard Lee	Hopton Wafers	Snailbeach
Blymhill	Ightfield	Snailbeach P/Pect Cottage
Bucknell*	Kidderminster Oldington	Stiperstones
Buildwas-Park View	Knowbury	Stoke Heath
Cardington	Lea Cross	Stoke St Milborough
Castle Pulve	Llynclys Bryn Melyn	Stoke on Tern
Caynham Pulverbatch	Longdon Common	Stottesdon
Cheswardine	Longville in the Dale	Tenbury Wells
Church Stretton	Loppington	Ticklerton
Clun*	Lower Common	Walcot
Condover	Ludlow	Welshampton
Coton-Park Villas	Lyneal	Wem – Soulton Villas
Craven Arms	Minsterley	Wem
Cressage	Montford Bridge	Whitchurch (Assessed with RQP)
Cross Houses	Morville	Woodseaves
Culmington-Corve View	Munslow	Worthen
Diddlebury-the Moors	Newcastle	Yockleton
Edstaston-Pepper Street	Onibury	
Ercall Heath		

\*Water quality modelling did not identify an issue using the methodology in the WCS, but the fact that the River Clun SAC is already in an unfavourable condition means that any deterioration at these WwTWs would be unacceptable (see section 12 of the WCS).

- 3.13 The two DCWW treatment works serving proposed growth in the Local Plan, Five Fords and Whitchurch, have environmental capacity.
- 3.14 The WCS recommends various actions for SC and DCWW with respect to water quality. These are given in WCS table 9.4 (reproduced below):

**WCS Table 9.4 Table of recommendations for water quality**

Action	Responsibility	Timescale
Provide annual monitoring reports to STW and DCWW detailing projected housing growth in the Local Authority	SC	Ongoing
Take into account the full volume of growth (from SC and neighbouring authorities) within the catchment when considering WINEP schemes or upgrades at WwTW	STW, DCWW	Ongoing

**Flood risk from increased WwTW discharge**

- 3.15 The levels of development proposed are not predicted to have a significant impact on flood risk for the receiving watercourse at any of the wastewater treatment works.
- 3.16 Table 10.1 of the WCS shows that additional flows from WwTW due to development would have a negligible effect on the predicted peak flow events with return periods of 30 and 100 years as follows:

**WCS Table 10.1 Summary of Dry Weather Flow as a % of Q30 and Q100 peak flows**

WwTW	FEH Stat Q30 (m <sup>3</sup> /s)	FEH Stat Q100 (m <sup>3</sup> /s)	Additional Flow (m <sup>3</sup> /s)	Flow increase as % of Q30	Flow increase as % of Q100
Albrighton	2.44	3.36	0.04	0.53%	0.39%
Alveley	0.72	0.99	0.01	0.05%	0.04%
Baschurch	31.86	43.67	0.51	0.01%	0.00%
Bishops Castle	2.66	3.65	0.04	0.03%	0.02%
Bomere Heath	1.53	2.10	0.02	0.02%	0.02%
Bridgnorth Slads	739.18	888.93	10.29	0.00%	0.00%
Brompton Cross Houses	828.24	1001.18	11.59	0.00%	0.00%



WwTW	FEH Stat Q30 (m <sup>3</sup> /s)	FEH Stat Q100 (m <sup>3</sup> /s)	Additional Flow (m <sup>3</sup> /s)	Flow increase as % of Q30	Flow increase as % of Q100
Bucknell	17.25	22.36	0.26	0.00%	0.00%
Chirbury	2.57	3.53	0.04	0.00%	0.00%
Church Stretton	4.14	5.72	0.07	0.02%	0.01%
Cleobury Mortimer	57.50	74.47	0.86	0.00%	0.00%
Clive	0.50	0.67	0.01	0.03%	0.02%
Clun	50.00	66.40	0.77	0.00%	0.00%
Coalport	640.89	763.84	8.84	0.00%	0.00%
Coreley – Clee Hill	3.37	4.54	0.05	0.01%	0.01%
Craven Arms	84.84	117.90	1.36	0.00%	0.00%
Cressage	694.58	827.87	9.58	0.00%	0.00%
Ditton Priors	1.62	2.19	0.03	0.01%	0.01%
Dorrington	1.15	1.58	0.02	0.04%	0.03%
Drenewydd - Oswestry	1.71	2.32	0.03	0.16%	0.12%
Ellesmere Wharf Meadow	2.07	2.86	0.03	0.16%	0.11%
Five Fords (Wrexham)	40.92	56.31	0.65	0.01%	0.01%
Ford	785.25	947.99	10.97	0.00%	0.00%
Higher Heath Prees	2.68	3.66	0.04	0.04%	0.03%
Highley	12.41	16.77	0.19	0.01%	0.00%
Hinstock	1.75	2.40	0.03	0.02%	0.02%
Hodnet	1.04	1.43	0.02	0.03%	0.02%
Kinnerley	1.37	1.89	0.02	0.02%	0.01%
Knockin	0.12	0.16	0.00	0.18%	0.13%
Ludlow	227.50	293.98	3.40	0.00%	0.00%
Market Drayton	16.33	22.01	0.25	0.03%	0.02%
Mile Oak	23.90	31.19	0.36	0.03%	0.02%
Minsterley	21.39	29.15	0.34	0.00%	0.00%
Monkmoor	777.05	939.28	10.87	0.00%	0.00%
Much Wenlock	2.18	3.01	0.03	0.03%	0.02%
Nesscliffe – Wilcot	0.65	0.90	0.01	0.09%	0.07%
Pant-Plas Cerrig	553.87	704.31	8.15	0.00%	0.00%
Pontesbury	0.46	0.61	0.01	0.11%	0.08%

WwTW	FEH Stat Q30 (m <sup>3</sup> /s)	FEH Stat Q100 (m <sup>3</sup> /s)	Additional Flow (m <sup>3</sup> /s)	Flow increase as % of Q30	Flow increase as % of Q100
Ruyton XI Towns	31.24	42.09	0.49	0.00%	0.00%
Shawbury	38.07	52.14	0.60	0.00%	0.00%
Shifnal	5.32	7.17	0.08	0.15%	0.11%
Stoke Heath	1.32	1.81	0.02	0.23%	0.17%
Tenbury	284.11	353.60	4.09	0.00%	0.00%
Wem – Aston Road	14.55	18.66	0.22	0.00%	0.00%
West Felton	0.60	0.83	0.01	0.07%	0.05%
Whitchurch (Rising Sun)	2.93	4.03	0.05	0.21%	0.15%
Woore	3.95	5.30	0.06	0.01%	0.00%
Worthen	7.05	9.78	0.11	0.00%	0.00%

- 3.17 The WCS recommends various actions for DCWW with respect to flood risk management from increased WwTW discharge. These are given in WCS table 10.2 (reproduced below)

**WCS Table 10.2 Recommendations from the flood risk assessment (for WwTW)**

Action	Responsibility	Timescale
Proposals to increase discharges to a watercourse may also require a flood risk activities environmental permit from the EA (in the case of discharges to Main River), or a land drainage consent from the Lead Local Flood Authority (in the case of discharges to an Ordinary Watercourse).	STW, DCWW	During design of WwTW upgrades

### Environmental Constraints and Opportunities

- 3.18 Chapter 11 of the WCS considers potential impacts on the natural environment from growth in the Local Plan Review. This is supplemented by an Addendum setting out the results of a further water quality assessment for protected sites.
- 3.19 Shropshire contains a number of internationally designated wildlife sites (Special Areas of Conservation (SAC) and Ramsar sites) as well as many nationally designated wildlife sites (Sites of Special Scientific Interest (SSSI)). Additionally, there are many designated sites downstream of the county, including two Special Protection Areas (SPAs).
- 3.20 **Note:** The River Clun SAC is in unfavourable declining condition caused by high levels of silt and nutrients. Most development in the Shropshire part of the Clun catchment is likely to increase nitrogen and phosphate levels in the river. This will cause a significant effect on the

reasons for part of the river being designated as a SAC. The WCS explores potential mitigation measures for the River Clun SAC in Chapter 12 and the SAC is considered in Habitats Regulation Assessment for the Local Plan. However, no mitigation measures have been agreed with Natural England to date. To plan positively for development whilst safeguarding the SAC, Policy DP13 in the Local Plan requires all development in the river Clun catchment to be either nutrient neutral or to provide a betterment.

- 3.21 Development may cause an adverse impact on designated wildlife sites through an increase in water pollution from WwTW discharge (a point source). The WCS Water Quality Addendum (March 2021) assesses the potential for water quality impacts for all SACs, SPAs Ramsar Sites and SSSI's in Shropshire and downstream of the county. Table 3.1 of the WCS Addendum (reproduced below) shows which protected sites are downstream of WwTW and Table A1.1 of Appendix A to the WCS Addendum sets out the results of the assessment (also reproduced below).

**WCS Addendum Table 0.1 Screening of protected sites within and downstream of Shropshire**

Type of receptor	Name	Reference	WwTW Upstream – further assessment required (YES/NO)
SSSI	Aileshurst Coppice	SO773502	NO
SSSI	Allscott Settling Ponds	SJ601129	YES
SSSI	Aqualate Mere	SJ773204	YES
SSSI	Areley Wood	SO787711	NO
SSSI	Ashleworth Ham	SO832262	YES
SSSI	Ashmoor Common	SO852466	YES
SSSI	Astridge Wood	SO546087	NO
SSSI	Attingham Park	SJ551095	YES
SSSI	Aust Cliff	ST568898	YES
SSSI	Brotheridge Green Disused Railway Line	SO814412	NO
SSSI	Buildwas River Section	SJ640045	YES
SSSI	Bullhill Brook	SJ555015	NO
SSSI	Burley Dene Meadows	SO813323	NO
SSSI	Burrington Meadow	SO445716	NO
SSSI	Burrington Sections	SO442725	YES
SSSI	Bush Wood and High Wood	SO706824	NO
SSSI	Chaceley Meadow	SO857305	YES
SSSI	Chermes Dingle	SJ614061	NO

Type of receptor	Name	Reference	WwTW Upstream – further assessment required (YES/NO)
SSSI	Chorley Covert and Deserts Wood	SO704839	NO
SSSI	Coombe Hill Canal	SO867268	YES
SSSI	Coundmoor Brook	SJ558035	NO
SSSI	Crofts Mill Pasture	SJ304246	YES
SSSI	Downton Gorge	SO445742	YES
SSSI	Earl's Hill & Habberley Valley	SJ410047	NO
SSSI	Fenemere	SJ445228	NO
SSSI	Fenn's, Whixall, Bettisfield, Wem & Cadney Mosses	SJ488355	NO
SSSI	Fernhill Pastures	SJ322329	NO
SSSI	Flat Coppice	SO394868	NO
SSSI	Frampton Pools	SO753073	NO
SSSI	Garden Cliff	SO718127	NO
SSSI	Grange Meadow	SO805481	NO
SSSI	Grimley Brick Pits	SO838616	YES
SSSI	Hartlebury Common and Hillditch Coppice	SO823707	YES
SSSI	Hencott Pool	SJ489160	NO
SSSI	Hope Valley	SJ354020	NO
SSSI	Hughley Brook	SJ591001	NO
SSSI	Innsworth Meadow	SO850215	NO
SSSI	Lazy Meadow	SP016415	NO
SSSI	Leigh Brook Valley	SO745516	NO
SSSI	Lincoln Hill	SJ669038	NO
SSSI	Long Mynd	SO424938	NO
SSSI	Lord's Wood Meadows	SO732552	YES
SSSI	Lydebrook Dingle	SJ659062	NO
SSSI	Lydney Cliff	SO653017	YES
SSSI	Malthouse Farm Meadows	SO805389	NO
SSSI	Marton Pool, Chirbury	SJ295027	NO
SSSI	Meezy Hurst	SO642086	NO
SSSI	Montgomery Canal, Aston Locks - Keeper's Bridge	SJ348274	NO

Type of receptor	Name	Reference	WwTW Upstream – further assessment required (YES/NO)
SSSI	Muxton Marsh	SJ715134	NO
SSSI	Nagshead	SO607092	NO
SSSI	Newport Canal	SJ736193	NO
SSSI	Nine Holes Meadows	SO610670	NO
SSSI	Northwick Marsh	SO835579	YES
SSSI	Oak Dingle	SO565872	NO
SSSI	Old River Bed, Shrewsbury	SJ496147	NO
SSSI	Old River Severn, Upper Lode	SO880330	YES
SSSI	Onny River Section	SO424853	NO
SSSI	Osebury Rock	SO737555	YES
SSSI	Purton Passage	SO686044	YES
SSSI	Ranters Bank Pastures	SO722749	NO
SSSI	Rectory Farm Meadows	SO921382	NO
SSSI	River Severn at Montford	SJ414144	YES
SSSI	River Teme	SO507745	YES
SSSI	River Wye	SO519384	NO
SSSI	Ruewood Pastures	SJ495279	YES
SSSI	Severn Estuary	ST529870	YES
SSSI	Severn Ham, Tewkesbury	SO885325	YES
SSSI	Sheinton Brook	SJ607038	YES
SSSI	Shrawley Wood	SO808659	YES
SSSI	Soudley Ponds	SO662112	NO
SSSI	Sweat Mere and Crose Mere	SJ433305	NO
SSSI	Teme Bank	SO507742	YES
SSSI	Temeside	SO518742	NO
SSSI	Thatchers Wood and Westwood Covert	SO702904	YES
SSSI	Tick Wood and Benthall Edge	SJ663033	YES
SSSI	Tiddesley Wood	SO929452	NO
SSSI	Upham Meadow and Summer Leasow	SO915375	NO
SSSI	Upper Severn Estuary	SO716063	YES
SSSI	Upton Ham	SO859400	YES

Type of receptor	Name	Reference	WwTW Upstream – further assessment required (YES/NO)
SSSI	Wainlode Cliff	SO845257	YES
SSSI	Walmore Common	SO744151	YES
SSSI	Whitwell Coppice	SJ618021	YES
SSSI	Wyre Forest	SO745766	YES
SAC	Downton Gorge	UK0012735	YES
SAC	Fenn's, Whixall, Bettisfield, Wem & Cadney Mosses	UK0012912	NO
SAC	River Clun	UK0030250	YES
SAC	River Wye	UK0012642	NO
SAC	Severn Estuary	UK0013030	YES
SAC	Wye Valley Woodlands	UK0012642	YES
SPA	Severn Estuary	UK9015022	YES
SPA	Walmore Common	UK9007051	YES
Ramsar	Midland Meres & Mosses Phase 1	UK11043	NO
Ramsar	Midland Meres & Mosses Phase 2	UK11080	YES
Ramsar	Severn Estuary	UK11081	YES
Ramsar	Walmore Common	UK11076	YES

**WCS Addendum Appendix A Table A1.1 Assessment results for protected sites likely to be affected by changes in water quality.**

Protected site	Ref.	Adjacent watercourse ID	Adjacent watercourse name	Pollutant	Baseline Conc. (mg/l)	Future Conc. (mg/l)	% Det.	Conc. After treatment at TAL (mg/l)	Can deterioration be prevented?
Allscott Settling Ponds SSSI	SJ601129	GB109054049190	Roden - conf Sleaf Bk to conf R Tern	Phosphate	0.30	0.31	3%	0.15	Y
				Ammonia	0.11	0.11	0%	0.1	Y
				BOD	5.42	5.42	0%	5.42	Y
		GB109054050170	Tern - conf R Meese to conf R Roden	Phosphate	0.31	0.32	3%	0.12	Y
				Ammonia	0.15	0.15	0%	0.15	Y
				BOD	2.54	2.53	0%	2.45	Y
Aqualate Mere SSSI Midland Meres & Mosses Phase 2 Ramsar	SJ773204 UK11080	GB109054050190	Meese - Aqualate Mere tributaries	Phosphate	0.23	0.23	0%	0.17	Y
				Ammonia	0.09	0.09	0%	0.09	Y
				BOD	5.05	5.05	0%	5.05	Y
Ashleworth Ham SSSI	SO832262	GB109054044404	Severn - conf R Avon to conf Upper Parting	Phosphate	0.32	0.33	3%	0.1	Y
				Ammonia	0.05	0.05	0%	0.03	Y
				BOD	1.67	1.66	-1%	1.65	Y
Ashmoor Common SSSI	SO852466	GB109054039760	Severn - conf R Teme to conf R Avon	Phosphate	0.31	0.32	3%	0.1	Y
				Ammonia	0.05	0.05	0%	0.04	Y
				BOD	1.69	1.69	0%	1.66	Y
Attingham Park SSSI	SJ551095	GB109054049680	Tern - conf R Roden to conf R Severn	Phosphate	0.28	0.29	4%	0.12	Y
				Ammonia	0.11	0.11	0%	0.11	Y
				BOD	2.88	2.86	-1%	2.85	Y
Buildwas River Section SSSI	SJ640045	GB109054049141	Severn - Sundorne Bk to conf M Wenlock-Farley Bk	Phosphate	0.19	0.2	5%	0.1	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	1.73	1.73	0%	1.72	Y
		GB109054049390		Phosphate	1.08	1.16	7%	0.38	Y

Protected site	Ref.	Adjacent watercourse ID	Adjacent watercourse name	Pollutant	Baseline Conc. (mg/l)	Future Conc. (mg/l)	% Det.	Conc. After treatment at TAL (mg/l)	Can deterioration be prevented?
			Much Wenlock-Farley Bk - source to conf R Severn	Ammonia	0.06	0.06	0%	0.06	Y
				BOD	2.58	2.56	-1%	2.56	Y
Burrington Sections SSSI	SO442725	GB109054044500	Teme - conf R Clun to conf R Onny	Phosphate	0.13	0.13	0%	0.11	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	2.09	2.09	0%	2.09	Y
Chaceley Meadow SSSI	SO857305	GB109054044404	Severn - conf R Avon to conf Upper Parting	Phosphate	0.33	0.34	3%	0.1	Y
				Ammonia	0.06	0.06	0%	0.03	Y
				BOD	1.60	1.59	-1%	1.58	Y
Coombe Hill Canal SSSI	SO867268	GB109054044404	Severn - conf R Avon to conf Upper Parting	Phosphate	0.32	0.33	3%	0.1	Y
				Ammonia	0.06	0.06	0%	0.03	Y
				BOD	1.64	1.64	0%	1.61	Y
Crofts Mill Pasture SSSI	SJ304246	GB109054055070	Morda - source to conf unnamed trib	Phosphate	1.15	1.23	7%	0.23	Y
				Ammonia	0.08	0.08	0%	0.08	Y
				BOD	2.77	2.78	0%	2.78	Y
Downton Gorge (SSSI and SAC)	SO445742 UK0012735	GB109054044500	Teme - conf R Clun to conf R Onny	Phosphate	0.13	0.13	0%	0.11	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	2.07	2.07	0%	2.07	Y
Grimley Brick Pits	SO838616	GB109054049144	Severn - conf R Stour to conf River Teme	Phosphate	0.30	0.32	7%	0.1	Y
				Ammonia	0.05	0.05	0%	0.03	Y
				BOD	1.47	1.47	0%	1.46	Y
				Phosphate	0.30	0.32	7%	0.09	Y
				Ammonia	0.05	0.05	0%	0.03	Y
				BOD	1.50	1.5	0%	1.49	Y
	SO823707	GB109054049144		Phosphate	0.33	0.35	6%	0.1	Y



Protected site	Ref.	Adjacent watercourse ID	Adjacent watercourse name	Pollutant	Baseline Conc. (mg/l)	Future Conc. (mg/l)	% Det.	Conc. After treatment at TAL (mg/l)	Can deterioration be prevented?
Hartlebury Common and Hillditch Coppice			Severn - conf R Stour to conf River Teme	Ammonia	0.06	0.06	0%	0.03	Y
				BOD	1.54	1.54	0%	1.53	Y
Lord's Wood Meadows	SO732552	GB109054044510	Teme - conf R Onny to conf R Severn	Phosphate	0.15	0.15	0%	0.13	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	2.36	2.36	0%	2.36	Y
Northwick Marsh	SO835579	GB109054049144	Severn - conf R Stour to conf River Teme	Phosphate	0.31	0.33	6%	0.09	Y
				Ammonia	0.05	0.05	0%	0.03	Y
				BOD	1.50	1.5	0%	1.48	Y
Old River Severn, Upper Lode	SO880330	GB109054044404	Severn - conf R Avon to conf Upper Parting	Phosphate	0.32	0.33	3%	0.1	Y
				Ammonia	0.06	0.06	0%	0.04	Y
				BOD	1.61	1.61	0%	1.59	Y
Osebury Rock	SO737555	GB109054044510	Teme - conf R Onny to conf R Severn	Phosphate	0.15	0.15	0%	0.13	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	0.04	0.04	0%	0.04	Y
River Clun SAC (Includes part of River Teme SSSI)	UK0030250	GB109054043990	Clun - conf R Unk to conf R Teme	Phosphate	0.14	0.15	7%	0.13	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	2.11	2.11	0%	2.1	Y
				Phosphate	0.14	0.15	7%	0.12	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	2.13	2.13	0%	2.13	Y
				Phosphate	0.15	0.16	7%	0.12	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	2.17	2.17	0%	2.17	Y
	SJ414144	GB109054049142		Phosphate	0.13	0.13	0%	0.09	Y

Protected site	Ref.	Adjacent watercourse ID	Adjacent watercourse name	Pollutant	Baseline Conc. (mg/l)	Future Conc. (mg/l)	% Det.	Conc. After treatment at TAL (mg/l)	Can deterioration be prevented?
River Severn at Montford			Severn - conf Bele Bk to conf Sundorne Bk	Ammonia	0.04	0.04	0%	0.04	Y
				BOD	1.99	1.99	0%	1.98	Y
				Phosphate	0.25	0.25	0%	0.22	Y
Ruewood Pastures	SJ495279	GB109054049180	Roden - conf unnamed trib to conf Sleep Bk	Ammonia	0.18	0.18	0%	0.18	Y
				BOD	6.86	6.85	0%	6.85	Y
				Phosphate	0.32	0.33	3%	0.1	Y
Severn Ham, Tewkesbury	SO885325	GB109054044404	Severn - conf R Avon to conf Upper Parting	Ammonia	0.06	0.06	0%	0.04	Y
				BOD	1.61	1.61	0%	1.59	Y
				Phosphate	0.22	0.22	0%	0.2	Y
Sheinton Brook	SJ607038	GB109054049360	Sheinton Bk - source to conf R Severn	Ammonia	0.03	0.03	0%	0.03	Y
				BOD	0.28	0.28	0%	0.28	Y
				Phosphate	0.31	0.33	6%	0.1	Y
Shrawley Wood	SO808659	GB109054049144	Severn - conf R Stour to conf River Teme	Ammonia	0.05	0.05	0%	0.03	Y
				BOD	1.50	1.5	0%	1.48	Y
				Phosphate	0.16	0.16	0%	0.15	Y
Teme Bank	SO507742	GB109054044510	Teme - conf R Onny to conf R Severn	Ammonia	0.04	0.04	0%	0.04	Y
				BOD	1.86	1.86	0%	1.86	Y
				Phosphate	0.59	0.59	0%	0.53	Y
Thatchers Wood and Westwood Covert	SO702904	GB109054049240	Mor Bk - conf Beaconhill Bk to conf R Severn	Ammonia	0.05	0.05	0%	0.05	Y
				BOD	9.04	9.04	0%	9.04	Y
				Phosphate	0.20	0.21	5%	0.1	Y
Tick Wood and Benthall Edge	SJ663033	GB109054049143	Severn conf M Wenlock-Farley Bk to conf R Worfe	Ammonia	0.04	0.04	0%	0.04	Y
				BOD	1.71	1.71	0%	1.71	Y
				Phosphate	0.32	0.33	3%	0.1	Y
Upton Ham	SO859400	GB109054039760							

Protected site	Ref.	Adjacent watercourse ID	Adjacent watercourse name	Pollutant	Baseline Conc. (mg/l)	Future Conc. (mg/l)	% Det.	Conc. After treatment at TAL (mg/l)	Can deterioration be prevented?
			Severn - conf R Teme to conf R Avon	Ammonia	0.06	0.06	0%	0.04	Y
				BOD	1.68	1.68	0%	1.65	Y
Wainlode Cliff	SO845257	GB109054044404	Severn - conf R Avon to conf Upper Parting	Phosphate	0.32	0.33	3%	0.1	Y
				Ammonia	0.05	0.05	0%	0.03	Y
				BOD	1.67	1.66	-1%	1.65	Y
Whitwell Coppice	SJ618021	GB109054049360	Sheinton Bk - source to conf R Severn	Phosphate	0.18	0.18	0%	0.16	Y
				Ammonia	0.04	0.04	0%	0.04	Y
				BOD	0.30	0.3	0%	0.3	Y
Wyre Forest	SO745766	GB109054049145	Severn - conf R Worfe to conf R Stour	Phosphate	0.22	0.25	14%	0.1	Y
				Ammonia	0.10	0.1	0%	0.03	Y
				BOD	1.53	1.53	0%	1.52	Y
The following protected sites are adjacent to the River Severn estuary and are not within the bounds of the SIMCAT model. Water quality at the downstream extent of the model (two tributaries) is used as a proxy for water quality adjacent to these sites.									
Severn Estuary (SSSI, SAC, SPA and Ramsar)	ST529870 UK0013030 UK9015022 UK11081	Transitional waterbody	River Severn Estuary	Phosphate	0.31	0.32	3%	0.1	Y
Upper Severn Estuary SSSI	SO716063			Ammonia	0.05	0.05	0%	0.03	Y
Aust Cliff SSSI	ST568898			BOD	1.68	1.68	0%	1.66	Y
Purton Passage	SO686044			Phosphate	0.31	0.32	3%	0.1	Y
River Wye SSSI and SAC	SO519384 UK0012642			Ammonia	0.05	0.05	0%	0.03	Y

Protected site	Ref.	Adjacent watercourse ID	Adjacent watercourse name	Pollutant	Baseline Conc. (mg/l)	Future Conc. (mg/l)	% Det.	Conc. After treatment at TAL (mg/l)	Can deterioration be prevented?
Walmore Common (SPA, Ramsar)	UK9007051 UK11076			BOD	1.65	1.65	0%	1.63	Y
The River Teme has been designated as a SSSI along its entire length. Water quality was checked at all points (399) along its length, and the point with the largest deterioration in Phosphate is shown below. In every case, deterioration could be prevented by improvements in upstream treatment processes.									
River Teme SSSI	SO507745	GB109054044510	Teme - conf R Onny to conf R Severn	Phosphate	0.08	0.09	13%	0.08	Y
				Ammonia	0.05	0.05	0%	0.04	Y
				BOD	2.40	2.4	0%	2.4	Y

- 3.22 The assessment shows that improvements to those WwTW upstream of all protected sites can prevent a deterioration in water quality (and in fact will either maintain current conditions or create an improvement) and thus none of the protected sites will be adversely affected by the growth proposed in the Local Plan.
- 3.23 The WCS Addendum recommends various actions for DCWW and SC with respect to water quality impacts on protected sites. These are given in Addendum table 4.1 (reproduced below - additional text for clarity in italics).

**WCS Addendum Table 4.1 Table of recommendations (*with respect to water quality for protected sites*)**

Action	Responsibility	Timescale
Provide annual monitoring reports to STW and DCWW detailing projected housing growth in the Local Authority	SC	Ongoing
Take into account the full volume of growth (from SC and neighbouring authorities) within the catchment when considering WINEP schemes or upgrades at WwTW	STW, DCWW	Ongoing

- 3.24 Chapter 11 of the WCS also covers diffuse sources of water pollution; groundwater protection (Source Protection Zones); natural flood management; surface water drainage and Sustainable Drainage Systems (SuDS).
- 3.25 The WCS identifies six site allocations in the Local Plan Review which could be sources of diffuse pollution but none of these are in DCWW's area.
- 3.26 The WCS promotes the use of natural flood management to reduce flood risk and protect, restore and re-naturalise the function of catchments and rivers, The WCS also sets out the benefits of SuDS for the management of surface water flooding and the reduction of diffuse pollution. Advice is given on SuDS suitability for allocated sites.
- 3.27 The WCS recommends various actions for SC and DCWW with respect to environmental constraints and opportunities. These are given in WCS table 11.6 as follows

**WCS Table 11.6 Recommendations from environmental constraints and opportunities section**

Action	Responsibility	Timescale
In partnership, identify opportunities for incorporating SuDS into open spaces and green infrastructure, to deliver strategic flood risk management and meet WFD water quality targets.	SC STW, DCWW EA	Ongoing

#### **4. Agreed actions for DCWW and SC**

- 4.1 Table 4.1 below brings together all the actions identified for DCWW and SC arising from the WCS. It indicates which have been implemented and which are either ongoing or outstanding. The latter form the basis for this agreed Statement of Common Ground. DCWW have also provided explanatory comments and these are shown in the last column.

**Table 4.1 Agreed Actions for DCWW and SC**

No.	Action	Responsibility	Timescale	Completed	Implementation agreed	DCWW Comments
<b>Wastewater collection infrastructure</b>						
1	<p>Early engagement between the SC and DCWW is required to ensure that where strategic infrastructure is required, it can be planned in by DCWW.</p> <p>Take into account wastewater infrastructure constraints in phasing development in partnership with the sewerage undertaker</p>	<p>DCWW SC</p>	Ongoing	<p>Ongoing</p> <p>Policy DP19 requires developers to demonstrate how their proposal will be served by adequate water infrastructure, including any phasing to allow necessary infrastructure capacity improvements. Where development is bought forward in advance of planned capacity improvements by the relevant water company through their Asset Management Process, any required capacity improvements should be delivered via agreement between the developer and the water company.</p>	<p>DCWW agrees SC agrees</p> <p>Implementation through the Development Management process</p>	<p>The AMP7 programme is currently being delivered which covers investment for the period 2020-25, this will be followed by AMP8 for 2025-2030 etc. Funding for capital investment is raised through customers' bills.</p> <p>There is a finite amount of money available within an AMP period to deliver strategic infrastructure schemes, as such where shortfalls in funding occur and there is no capacity in the local network of assets to accommodate new growth, the developer can pay for the necessary upgrades themselves, secured either through the requisition provisions of the Water Industry Act (WIA) 1991 or via Planning Obligations Agreements under the TCPA 1990. It should be noted that the requisition provision of the WIA 1991 only applies to sewerage network reinforcement works, not to WwTW schemes. Funding to deliver reinforcement works at a WwTW can be delivered via Section 106 of the Town and Country Planning Act 1990.</p> <p>We support the reference within this action that improvements</p>

No.	Action	Responsibility	Timescale	Completed	Implementation agreed	DCWW Comments
						can be delivered via agreements between the developer and the water company.
2	<p>Developers will be expected to work with the sewerage undertaker closely and early in the planning promotion process to develop an outline Drainage Strategy for sites. The Outline Drainage strategy should set out the following:</p> <p>What – What is required to serve the site</p> <p>Where – Where are the assets / upgrades to be located</p> <p>When – When are the assets to be delivered (phasing)</p> <p>Which – Which delivery route is the developer going to use s104 s98 s106 etc. The Outline Drainage Strategy should be submitted as part of the planning application submission, and where required, used as a basis for a drainage planning condition to be set.</p>	DCWW Developers	Ongoing	Ongoing	DCWW agrees.  Implementation through the Development Management process	We welcome early engagement with developers regarding their sites. We offer a pre-application service to developers where we would identify any constraints to delivering the sites. In those locations where insufficient hydraulic capacity exists within the sewerage network to accommodate a site, foul hydraulic modelling assessments (HMA) may be required (undertaken at the developer's expense) to establish suitable connection points and / or necessary reinforcement works to enable the sites to connect to the sewerage network. Our representations on the Local Plan proposed allocations identify the sites where HMAs are expected to be required.




No.	Action	Responsibility	Timescale	Completed	Implementation agreed	DCWW Comments
3	Developers will be expected to demonstrate to the Lead Local Flood Authority (LLFA) that surface water from a site will be disposed using a sustainable drainage system (SuDS) with connection to surface water sewers seen as the last option. New connections for surface water to foul sewers will be resisted by the LLFA.	Developers LLFA	Ongoing	<p>Policy DP22 requires all development proposals to be accompanied by a surface water management plan or statement.</p> <p>Policy DP22 requires all major development to incorporate SuDS. Other forms of development are strongly encouraged to incorporate SuDS wherever possible. Paragraph 3 of this policy sets out a hierarchy of drainage options for SuDS with connection to a combined sewer being the least favoured.</p> <p>The SC SuDS handbook sets out more detail on the design of SuDS and provides guidance on suitability by development type. Policy DP22 requires developers to follow either this, or the most recent version of the Construction Industry Research and Information Association (CIRIA) SuDS Manual, whichever is the later.</p>	<p>SC as LLFA agree.</p> <p>Implementation through the Development Management process</p>	We support the reference that new connections for surface water to foul sewers will be resisted by the LLFA.
<b>Wastewater treatment capacity</b>						
4	Early engagement with DCWW is required to ensure that provision of WwTW capacity is aligned	DCWW SC	Ongoing	Policy DP19 requires developers to demonstrate how their proposal will be served by adequate water infrastructure, including any phasing to allow necessary infrastructure	<p>SC agrees. DCWW agrees</p> <p>Implementation through DCWW</p>	There are two WwTWs serving the proposed allocations, Five Fords (Wrexham) and Whitchurch. We have made representations to confirm that there is sufficient capacity

No.	Action	Responsibility	Timescale	Completed	Implementation agreed	DCWW Comments
	with delivery of development.			capacity improvements. Where development is bought forward in advance of planned capacity improvements by the relevant water company through their Asset Management Process, any required capacity improvements should be delivered via agreement between the developer and the water company.	early engagement with the Development Management process	available at these works to accommodate the Local Plan proposed growth. There is also a scheme to be delivered at Whitchurch WwTW during the AMP7 period to ensure we meet new environmental obligations as identified through Environment Agency's Water Industry National Environment Programme (WINEP). Notwithstanding this information, we support the reference within the action point regarding developers being able to make contributions towards delivery of infrastructure (as per our comments above)
5	Provide Annual Monitoring Reports to DCWW detailing projected housing growth.	SC	Ongoing	Annually	SC agrees.  Implementation through the SC AMR and 5 Year Supply Statement. Both are produced annually and are available on SC's website.	Noted
6	DCWW to assess growth demands as part of their wastewater asset planning activities and feedback to the Council if concerns arise.	DCWW SC	Ongoing	Ongoing	DCWW agrees.  Implementation through the SC Strategic Infrastructure Forum/regular	We have made high level assessments of the proposed allocations in our representation on the Local Plan, and we will also provide comments via planning application representations, and

No.	Action	Responsibility	Timescale	Completed	Implementation agreed	DCWW Comments
					liaison between DCWW and SC.	consultations on annual housing monitoring reports
<b>Water quality</b>						
7	Provide annual monitoring reports to DCWW detailing projected housing growth in the Local Authority	SC	Ongoing	Annually	SC agrees.  Implementation through SC AMR and 5 Year Supply Statement. Both are produced annually and are available on SC website.	Noted
8	Take into account the full volume of growth (from SC and neighbouring authorities) within the catchment when considering WINEP schemes or upgrades at WwTW	DCWW	Ongoing	Ongoing	DCWW agrees	Noted. As part of our scheme designs we take into account the proposed growth as identified in the adopted Local Plan
<b>Flood risk from increased WwTW discharge</b>						
9	Proposals to increase discharges to a watercourse may also require a flood risk activities environmental permit from the EA (in the case of discharges to Main River), or a land drainage consent from the Lead Local Flood Authority (in the case of discharges to an Ordinary	DCWW	During design of WwTW upgrades		DCWW agrees	Flood risk environmental permits and land drainage consents form part of DCWW's normal operating procedures and as such will always be obtained and complied with

No.	Action	Responsibility	Timescale	Completed	Implementation agreed	DCWW Comments
	Watercourse).					
<b>Environmental Constraints and Opportunities</b>						
10	Provide annual monitoring reports to DCWW detailing projected housing growth in the Local Authority	SC	Ongoing	Annually	SC agrees.  Implementation through SC AMR and 5 Year Supply Statement. Both are produced annually and are available on SC website.	Noted.
11	Take into account the full volume of growth (from SC and neighbouring authorities) within the catchment when considering WINEP schemes or upgrades at DCWW WwTW	DCWW	Ongoing		DCWW agrees	Note. As part of our scheme designs we take into account the proposed growth as identified in the adopted Local Plan
12	In partnership, identify opportunities for incorporating SuDS into open spaces and green infrastructure, to deliver strategic flood risk management and meet WFD water quality targets.	SC DCWW EA	Ongoing	Policies DP14 and DP15 cover the provision of green infrastructure and open space. Policies DP19, DP21 and DP22 cover water quality, flood risk and SuDs respectively	n/a	Developers are responsible for identifying and delivering SuDS. DCWW supports such provision where relevant in the interests of reducing flood risk and improving water quality

## 5. Formal approval

	
Name:	Edward West
Position:	Planning Policy and Strategy Manager
Signature:	
Date:	16.06.21
<b>Dwr Cymru Welsh Water</b>	
Name:	Dewi Griffiths
Position:	Forward Plans Officer
Signature:	
Date:	18.06.21

**Appendix A: Dwr Cymru Welsh Water representation to Regulation 19 Pre-Submission  
Draft Local Plan**

## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S8.2"/>	Policy:	<input type="text" value="S8 Ellesmere"/>	Site:	<input type="text" value="DUDH006"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

DUDH006 There are only a few sections of DCWW asset in this area so it is not expected that the proposed development would have an adverse impact upon our sewerage assets. The site is crossed by a public sewer which may restrict development density for the site. Under the Water Industry Act 1991 DCWW has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.

(Please continue on a separate sheet if necessary)

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

*(Please continue on a separate sheet if necessary)*

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*(Please continue on a separate sheet if necessary)*

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Dewi Griffiths

Date:

19/01/2021

Office Use Only

Part A Reference:

Part B Reference:



## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
------------------------	-----------------------------

#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S14.2 (i)"/>	Policy:	<input type="text" value="S14"/>	Site:	<input type="text" value="SMH031"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

SMH031 East of Moors Bank, St. Martins •The public sewerage network can accept the potential foul flows from the proposed development site however an assessment of the Sewage Pumping Station (SPS) would need to be undertaken to establish whether improvements are required. • Potential developers need to be aware that this site is crossed by a sewer and protection measures in the form of an easement width or a diversion of the pipe would be required which may impact upon the housing density achievable on site. • The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.

(Please continue on a separate sheet if necessary)

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

*(Please continue on a separate sheet if necessary)*

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*(Please continue on a separate sheet if necessary)*

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Dewi Griffiths

Date:

19/01/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

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### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
------------------------	-----------------------------

#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S14.2 (i)"/>	Policy:	<input type="text" value="S14"/>	Site:	<input type="text" value="SMH038"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

SMH038 Ifton Heath School, St. Martins • The public sewerage network can accept the potential foul flows from the proposed development site. • The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.
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(Please continue on a separate sheet if necessary)

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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*(Please continue on a separate sheet if necessary)*

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)  
 Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*(Please continue on a separate sheet if necessary)*

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:

Dewi Griffiths

Date:

19/01/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
------------------------	-----------------------------

#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S14.2 (i)"/>	Policy:	<input type="text" value="S14"/>	Site:	<input type="text" value="WRP001VAR"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

*(Please tick as appropriate).*

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

WRP001VAR West of Trehowell Lane, Weston Rhyn. A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.

*(Please continue on a separate sheet if necessary)*

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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*(Please continue on a separate sheet if necessary)*

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)  
 Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*(Please continue on a separate sheet if necessary)*

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: Dewi Griffiths Date: 19/01/2021

Office Use Only	Part A Reference:
	Part B Reference:

## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
------------------------	-----------------------------

#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S14.2 (i)"/>	Policy:	<input type="text" value="S14"/>	Site:	<input type="text" value="WRP017"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

WRP017 Land off Station Road, Weston Rhyn • A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.
---

(Please continue on a separate sheet if necessary)



**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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*(Please continue on a separate sheet if necessary)*

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)  
 Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*(Please continue on a separate sheet if necessary)*

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:

Dewi Griffiths

Date:

19/01/2021

Office Use Only

Part A Reference:

Part B Reference:



## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S18.1 (i)"/>	Policy:	<input type="text" value="S18"/>	Site:	<input type="text" value="WHT042"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>WHT042 Land north of Waymills • A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). • The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.</p>
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(Please continue on a separate sheet if necessary)

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

*(Please continue on a separate sheet if necessary)*

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)  
 Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*(Please continue on a separate sheet if necessary)*

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: Dewi Griffiths Date: 19/01/2021

Office Use Only	Part A Reference:
	Part B Reference:

## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

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### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
------------------------	-----------------------------

#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S18.1 (i)"/>	Policy:	<input type="text" value="S18"/>	Site:	<input type="text" value="WHT014"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant                     | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
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*(Please tick as appropriate).*

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WHT014 Land at Liverpool Road • The public sewerage network can accept the potential foul flows from the proposed development site • The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.

*(Please continue on a separate sheet if necessary)*

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*(Please continue on a separate sheet if necessary)*

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Signature:

Dewi Griffiths

Date:

19/01/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Dewi Griffiths, Welsh Water
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="S18.1 (i)"/>	Policy:	<input type="text" value="S18"/>	Site:	<input type="text" value="WHT037 &amp; 044"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                                     |     |                          |
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| B. Sound                                 | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
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<p>WHT037 &amp; WHT044 Land to the north of Chester Road, Whitchurch• The public sewerage network can accept the potential foul flows from the proposed allocation. Welsh Water will seek to control the points of communication to the sewerage network via appropriate planning conditions as such there would be a requirement for off-site sewers to be provided to the boundary of the development site. The sewers can be requisitioned through the provisions of the Water Industry Act 1991 (as amended).•The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.</p>
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(Please continue on a separate sheet if necessary)

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Signature:	Dewi Griffiths	Date:	19/01/2021
Office Use Only		Part A Reference:	
		Part B Reference:	