

## **BUILDWAS PARISH COUNCIL**

### **RESPONSE TO PLANNING APPLICATION 19/05560/OUT**

#### **POWER STATION SITE OUTLINE APPLICATION**

## **OBJECT**

### **Summary of reasons for objection**

The Parish Council objects due to the scale of the development which is not in keeping with the parish of Buildwas as an area of Open Countryside, bordering a World Heritage Site, Area of Outstanding Natural Beauty, and Scheduled Ancient Monument. The green areas of the proposed development site support a wide range of habitats and species and the development would have devastating consequences for these. The local infrastructure, including the road network, has insufficient capacity to cope with the increased population that a development of this scale would bring. The implications of this are far wider than our own parish, with increased pressure on the local highways towards Much Wenlock, towards Shrewsbury via Leighton and Wroxeter, and towards Telford. There would be significant increased pressure on local services including education, health and policing, which are already stretched. The Parish Council also has some concerns that while the application currently states 1,000 homes, there may be potential for this to creep up during the lifespan of the development, further increasing the negative impact on the area. For these reasons, we objected to the site as a proposed Strategic Development Site in the Shropshire Council consultation. Some aspirational elements have been discussed as part of the proposal including the community buildings, reinstatement of the railway line, and the network of cycling and pedestrian routes which would all be positive for the local area, but there is some scepticism in the local community that these are being used as 'selling points' for the development and may not be delivered, leaving the parish with an unwanted housing development, with none of the associated benefits that have been indicated.

The Parish Council acknowledges that the brownfield area of the site requires some development/rehabilitation and would, in principle, support building on the power station footprint. We do not support building on the greenfield areas of the site which is high quality land and should be retained to provide a buffer between any development on the brownfield site and the surrounding countryside, World Heritage Site and scheduled ancient monument, helping to retain the character of the local area. This approach would also retain the crucial habitats and species that are found within the site.

Development within the Parish is already over the level agreed in the SAMDEV. The Parish Council has made representations on this in many recent responses to proposals much smaller than this proposal. This Parish Council is clear that development within the existing village of Buildwas should be minimal, proportionate to the size of the village and in keeping with the rural nature of the parish. The proposed development would inevitably alter the nature of the parish. There is also concern that with such a significant amount of building nearby, the ability to limit development within the existing village will be undermined.

### **Further representations**

Having outlined our objections, we would also like to make a number of representations which further explain our objections and which should be considered if the proposed development is granted planning approval.

As stated above, the Parish Council believes that this site should only be used for a far smaller development, however, should permission be granted, any development that takes

place should stay within the limits of this initial planning application/masterplan and should not be allowed to encroach any further into the green space available on the site. No more than 1,000 homes should be allowed. All proposed rehabilitation of the brownfield site should take place; the developer must not be allowed to build on the greenfield areas whilst leaving any of the brownfield site unfinished.

At this outline stage, there is limited detail on the housing design, how the heritage of the local area will be reflected in the development and the community areas, highways improvements relating to the detailed traffic modelling, and specifics relating to the industrial/commercial areas of the site. We acknowledge that, if the proposal is approved, the detail of these will be presented at a later stage in the planning process, and would have comments to make in relation to these detailed plans. At this stage, we would simply comment that any development should be sympathetic in scale and design to the rural nature of the parish in which it sits, and to the surrounding heritage.

### Highways

We echo the concerns of the neighbouring parishes of Much Wenlock, Leighton & Eaton Constantine and Wroxeter & Uppington in relation to the insufficient condition, capacity and safety of the surrounding road network to deal with the increased usage during both the construction phase of the development and when the homes are occupied. The particular points that we would highlight are:-

- We are awaiting the outcomes of the full traffic modelling and will respond to any further consultations in relation to the outcomes of this at the appropriate time. At this stage, we have concerns that the traffic modelling has been conducted at a quiet time of year and is unlikely to give a fully realistic picture of the local issues, particularly at peak times. We would query whether the traffic modelling includes all of the additional vehicles that would be anticipated on the road, including employment-related traffic, tourists, service vehicles to the homes and commercial/industrial units. Both this application and the sand and gravel application include their own traffic projections. There would be a period of 2-3 years when the quarry would be operational, people would be living in the first phase of homes, and construction vehicles would be working on the later phases. We do not believe that this combined amount of traffic is fully reflected and the impact analysed in the supporting documentation for the application. We have serious concerns about the capacity and safety of the surrounding road network for the increase of any stage of the proposed development, and in particular this peak time when all three elements of access will be required;
- Initial traffic modelling indicates around 6% traffic leaving the site by the B4380. Given the size of the proposed development, this is a significant increase on this particular road which is in a poor state of repair, with numerous large potholes and surface breaks, along its entire length through Buildwas and on to the junction at Atcham. We and neighbouring parishes have reported safety concerns over speeding along the road. There is regular speeding through the village of Buildwas with concerns for safety of those accessing the school, which sits adjacent to the road, and concerns for any vehicles waiting to turn off the B4380. These issues will be exacerbated with any increased traffic. Furthermore, the Parish Council believes 6% to be a low estimate as, in reality, more people are likely to take the B4380 to Shrewsbury than would take the bypass to access the motorway, therefore the negative impact on the road condition and safety, and on the amenity of residents along this road, would be further increased. Should the development be approved, the condition of the B4380 should be brought up to an acceptable level as a matter of priority at the earliest stage, before it is expected to take any increase in traffic.

Safety measures should be implemented at key points along the road, in consultation with the relevant Parish Councils, including consideration of altering the speed limit;

- As outlined in our response to the application for the sand and gravel extraction, the B4380 and A4169 are not appropriate for use by construction vehicles. The vehicles utilised now are much larger than those referred to as utilising the local roads when the power station was operational, and their impact on the roads would therefore be greater. Should this application be approved, there should be conditions put in place to ensure that all construction traffic uses the bypass which is far better suited to these vehicles than the alternative rural routes. Conditions should be accompanied by the appropriate measures (recognisable number plates, cameras on junctions) to enable enforcement of the routing conditions;
- The junctions within our Parish (B4380/A4169 at the bottom of Buildwas Bank, and Ironbridge Road/A4169) are already significantly congested at peak times, as is the junction at the Gaskell Arms in Much Wenlock. In recent weeks when Harley Bank was closed in response to the flooding, there were tailbacks of  $\frac{3}{4}$  mile in both directions along the A4169. The congestion would be exacerbated by the increase in traffic from such a large development and would have safety implications for road users and pedestrians;
- We have concerns about the proposals for the existing junctions within Buildwas and the proposed new access point to the development from the A4169. There are issues of speeding along both the A4169 and B4380, with excessive speeds regularly witnessed on the A4169 particularly, despite the speed limit. The placement of the proposed roundabout and traffic signals would be likely to result in the stacking up on traffic with potential for increased accidents at these points. There are also amenity concerns for the residents whose properties are located by these junctions, in terms of noise and light pollution. The junction at the bottom of Buildwas Bank is extremely problematic. As we have outlined from the earliest stages, there have been numerous occasions on which lorries travelling down Buildwas Bank have been unable to brake in time to turn left onto the A4169, have overshot the junction and had to turn around in the village. The proposed traffic signals at this junction would increase the chance of accidents on the junction. Should the development progress, a Road Safety Audit should be carried out for all proposed junctions to test the real-life implications of the proposals. The junction changes should be put in at the earliest stage of any development to maintain the flow of traffic and educate road users as to the changes from the outset;
- There are serious safety concerns in relation to speeding along the A4169, despite the speed limit which is ineffective due to lack of monitoring. Should the development proceed, appropriate safety measures should be put in place, in consultation with the Parish Council and residents, to improve safety along this road in anticipation of an increase in road useage;
- We understand that the bridge will be used for access during the early stages of construction to ease traffic on the main roads. This bridge has been inaccessible in recent weeks due to the flooding, and an alternative entrance has been used. We are concerned that this could happen again in future and would have implications for the surrounding road network. The implications of potential future flooding on the surrounding highways, which would be under pressure from increased traffic levels, should be further considered;
- Concerns have been expressed to the Parish Council about the capacity of Buildwas Bridge to withstand a significant increase in traffic. We would query whether sufficient studies have taken place to identify the weight limits that Buildwas Bridge can safely accommodate.

### Environmental issues/sustainability

- The Parish Council understands that the greenfield areas of the site are high quality versatile land and believe that this should be protected and not developed on.
- The quarrying proposed to lower the land level prior to development of the site will remove some of the best soakaway materials in the valley, will lower the ground level and the development would replace this sand and gravel with tarmac, which will inevitably lead to an increased run-off of water into the river. We have serious concerns over the potential impact of this on the site at Buildwas, and particularly on Ironbridge, which have been highlighted during the recent extreme flooding. The Environment Agency response to this application states that “the Flood Risk Assessment is not considered robust or comprehensive enough for a development of this scale and nature” and furthermore that the masterplan appears to show some residential development in Flood Zone 3 (high risk) which contradicts the Flood Risk Assessment which states that all built development is located within Flood Zone 1. The Parish Council has previously outlined concerns over the flood plain, but had been reassured that this had been accommodated by placing open/recreational spaces in the high risk flood zones. Having read the response of the Environment Agency, and having seen the extent of flooding in recent weeks, we would urge that a more robust and comprehensive Flood Risk Assessment be carried out. This should include consideration of the impact of the proposed quarrying on lowering land levels and increasing run-off by replacing soakaway materials with hard surfaces. The masterplan should be further reviewed to ensure that there would be no built development in Flood Zone 3. We are also concerned that the hydrological modelling does not appear to have been provided within the supporting documentation, preventing the Environment Agency from being able to determine whether the proposed built development is “safe, would remain flood free, and will not increase flood risk to third parties.” Particularly considering the recent flooding, we would have serious concerns if these assertions could not be corroborated by the Environment Agency and would urge that the modelling is provided to them at the earliest opportunity before any decision can be made about the proposed development on the flood zones. Should the development be approved, all appropriate mitigations to protect the surrounding area from the potential impact on future flooding levels should be put in place, both at the site itself and in Ironbridge;
- The Parish Council has some concerns about chemical leaching from the former power station site and reuse of PFA on site. We note that the Environment Agency has reviewed this and while broadly satisfied that the risks are being managed, has raised some points for clarification, which we hope will be answered by the applicant. We support the Environment agency recommendation for planning conditions to secure the commendations for contaminated land remediation;
- We have anecdotal information about play areas and open spaces within new developments which are not managed or maintained properly so soon fall into disrepair, disuse and potentially become dangerous. There is a vast amount of open space within the proposed development and a number of important species and habitats that must be protected and enhanced. The Parish Council is aware of the significant deer population in the area, and have noticed an increase in the number of deer killed on the roads (numbering around one per week in recent weeks) as they are pushed out of their habitat on the site. Others responding to this consultation have highlighted the numerous other species which inhabit the site, some of which we understand are becoming rare in the local area. Concerns about the reduction of habitat for these species should be a serious consideration as green space becomes ever more scarce. We understand that the mitigation put in place to protect the newt population has been unsuccessful because the relocation pond was insufficiently deep, and want to ensure that similar does not happen to other species should the development proceed. The lack of success of the newt ponds despite significant

investment demonstrates that the proper management of this site would require expertise in biodiversity. We would propose that a management committee should be established to take responsibility for management of open spaces and that this should be led by an expert organisation such as the Shropshire Wildlife Trust who could ensure that management is carried out in the most appropriate manner, to ensure that all green land within the site is used optimally and that biodiversity can flourish. This should be financed by way of an endowment or similar from the developer as the negative impact on the natural environment would be a direct result of the development. The Parish Council also recommends that a comprehensive wildlife survey is conducted and monitored to identify the range of species on site, and that this is monitored over the course of the proposed development and beyond;

- At this outline stage, there is little detail on the design of the buildings on site, but we would urge that conditions are put in at this stage to require sustainable building methods and design, taking full advantage of renewable energy (ground source heat pumps, charging points for electric vehicles, solar panels) to make the development sustainable for the future. In light of the recently declared Climate Emergency, the development should aim towards being carbon neutral;
- As included in our response to the Strategic Sites consultation, we agree that the acoustic design and layout of the site and appropriate building materials should mitigate any impact from noise associated with the retained substations for the benefit of residents of the proposed development. In addition, the Parish Council raises concerns for the current residents of Buildwas, regarding noise pollution in this area of Open Countryside. In particular, there are concerns for those on the fringes of the proposed development, and the potential for noise disturbance to them during the construction phase and once the industrial/commercial elements of the site are operational. We have also included our concerns about noise disturbance for the quarry site in our response to that application. Appropriate mitigation should be put in place to reduce wherever possible the increased noise level from development site;
- The Parish of Buildwas currently benefits from a lack of light pollution, which is valued by residents but is also crucial to the animal population, and is a defining characteristic of our parish. The proposed development would bring a significant, unwelcome, increase in lighting to the area. Should the development proceed, low level lighting solutions should be sought at all possible opportunities, to limit the negative impact on the surrounding area, and particularly the greenfield area of the site which borders open countryside. Any possible mitigations should also be put in place to limit the impact of car headlights, particularly for existing residents bordering the access points to the site. The proposed junction changes would include installing traffic signals which would further increase the light pollution in the parish. The Parish Council has previously turned down a proposed solution to increase visibility at the dangerous junction at the bottom of Buildwas Bank, as the vastness of the proposal would produce too much light pollution. The proposed changes to the junction would have a similarly negative impact on light pollution in this area of the village and for the neighbouring resident;
- The Parish Council has some concerns about proposed homes being situated near to the electricity lines. While we have been assured that these are largely over the industrial/commercial areas of the site, we would like to see further studies for assurance that the proximity of homes to the electricity lines are not a risk to health.

#### School

- As stated in our response to the Strategic Sites consultation, the Parish Council is against the closure of Buildwas Academy which has been a long-standing feature of the village and is a successful school. We would argue that this small, rural school could be retained as well as building a new, larger school.

- The Parish Council queries whether the applicant's assumptions for the trigger point for the building of a new school on the site are appropriate (350 properties). We are sceptical that Buildwas Academy has capacity in the short term for the potential number of children living in 350 homes. We would also query whether this trigger point takes into account the capacity of the village to accommodate the increased traffic at school times. The Parish Council has frequently discussed concerns about safety around the school site at the start and end of the school day, due to a lack of parking spaces and turning areas, speeding traffic through the village, and irresponsible parking outside of the school. These concerns would be exacerbated by the potential increase in school roll from 350 new properties.
- Should Buildwas Academy be closed, the school building and site should not be offered as a development site. The school building is a valued community asset and is a focal point, along with the church, around which the village sits. The building should be retained by the Parish for community use, which would maintain the integrity of the existing community of Buildwas.

#### Sustainable travel

- A sustainable transport plan should be developed at the earliest stage to ensure sufficient public transport links to reduce the number of individual private vehicles on the surrounding highway in order to both reduce pressure on the surrounding highways, and to support the local sustainability agenda. Bus service in the local area is somewhat unreliable. In order to establish use of public transport from the outset of the proposed development, a bus service serving the development should be put in place, whether by investing in the existing commercial service or by way of an electric mini bus should be put in place by the developer to serve the three main local routes (to Much Wenlock, to Shrewsbury and to Ironbridge). Such a service may initially be mostly used by existing residents of the surrounding villages, but could transfer to a commercial service at the point that critical mass of passengers makes this move sustainable. This will also in the initial stages of the development provide a valuable service to the existing residents of the surrounding areas along the routes out from the development, as an enhancement to those communities which will see a significant negative impact from the development.
- The Parish Council supports an extensive network of pedestrian and cycle links within the proposed site and to link the site to the local area, the existing national cycle route, and to Buildwas village and to Ironbridge, for the enjoyment of residents and to reduce pressure on the surrounding road network. We would request clarity and assurances on the provision of these routes. Such links would be one benefit of the proposed development, but we have reservations that they may be used as a 'selling point' for the application, but may never be delivered. We would want assurances on the routes that will be delivered, and it is crucial that these are put in place at the earliest point to establish habits for residents and visitors.

#### Healthcare

- We have some concerns over the capacity of local services to provide adequately for such a large potential increased in the local population, although we understand that there are ongoing discussions with the local health trusts.

#### Policing

- We would ask whether there will be any increase to the local policing team and visibility given the significant increase in population.

#### Sewerage

- There is no information within the plans or supporting documentation as to where sewage water will be discharged or whether a sewerage treatment plant will be installed. In the response to the application, Severn Trent Water has stated that existing sewerage system does not have capacity for a development of this size, and that extensive capital works would be required to pumping stations and sewer pipes towards Coalport Wastewater Treatment Works. It further states that “ the ground conditions and proximity to sensitive habitats in this area are unfavourable for this type of work” and that a more sustainable option should be implemented. The Parish Council supports the proposal of Severn Trent that a suitable form of onsite treatment should be considered for the management of wastewater.

#### Industrial/commercial use

- The Parish Council queries the quality of business that could be drawn to the industrial/commercial area of the proposed development, and how it will be made attractive to businesses when there are many more accessible sites in the local area e.g. Halesfield. Given the proximity to the proposed housing development, the existing residents of the parish and open countryside, the industrial/commercial aspect of the proposed development should not be of a loud nature e.g. manufacturing, to further limit the potential for noise pollution.

#### Links to local heritage/sympathetic design

- The scale of the proposed development is not sympathetic to the current character of the parish of Buildwas;
- There have been indications that the heritage of the parish of Buildwas will be protected and reflected in the proposed development, but there is little detail of how this will be achieved at this stage. The Parish Council would like to see more detail on this;
- Should the proposal be approved, the design of the buildings should be sympathetic to the local area, for example, using colours and design which blend into the landscape. The Parish Council would comment further on these aspects as the detailed plans come forward for any approved development;
- The proposed development is in very close proximity to Buildwas Abbey and we have concerns about the negative visual impact of the development on this Scheduled Monument, including the proposed new access point to the development. Appropriate design features should be utilised to mitigate the impact;
- We note that there is a phasing plan for construction and anticipate that as with other large developments, pockets of land will be sold to individual companies to build. Phases of development such be carefully controlled to ensure that the site as a whole is cohesive and sympathetic to the local area.