

5th March 2020

Much Wenlock Town Council Response to:

**Shropshire Council 19/05560/OUT
Telford and Wrekin TWC/2019/1046**

Ironbridge Power Station Buildwas Road Ironbridge Telford Shropshire TF8 7BL

Outline application (access for consideration comprising formation of two vehicular accesses off A4169 road) for the development of (up to) 1,000 dwellings; retirement village; employment land comprising classes B1(A), B1(C), B2 and B8; retail and other uses comprising classes A1, A2, A3, A4, A5, D1 and D2; allotments, sports pitches, a railway link, leisure uses, primary/nursery school, a park and ride facility, walking and cycling routes, and associated landscaping, drainage and infrastructure works.

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“Land is a limited Valuable Resource”

A key message from the Committee on Climate Change report of January 2020 Land use: Policies for a Net Zero UK

It is disappointing that there is no mention in the application headings to indicate that in this 350 acre site, which on occasions has been referred to as a brownfield site, nearly a third of the land, i.e. 106 acres, is prime agricultural land, most of which is earmarked for mineral extraction followed by large residential housing developments.

5.6. in the Principle of Development under the Planning issues report by the Pegasus Group reads:

“5.6 The brownfield nature and size of the application site creates a unique and significant opportunity to deliver a comprehensive development in a sustainable location. This fulfils the aims of the Framework (Section 11) in making as much use as possible of previously-developed or ‘brownfield’ land, particularly noting the value of using suitable brownfield land for homes and other identified needs, and supporting opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (paragraph 118).”

Is this correct? How can it be correct? We have read in a reference contained within the publicity material that 106 acres is agricultural land and therefore greenfield. That is just under a third of the total site. It looks like well kept prime agricultural land to us, so how can this reference not be a part of this application?

The comments would, of course, support regeneration but this does not to us appear to be the case. The majority of the 44 hectares of residential development is on that same greenfield land.

We consider that the applications under consideration are not a reflection of the reality. Whilst there is brownfield land put forward in the applications, there is also a considerable amount of prime agricultural land and, as far as we can find, it is only subject to written comment in a presentation paper used by the developer in the early stages of the process.

We feel this should be subject to a review and we therefore object and use that objection to support our submission that these applications are rejected.

Much Wenlock Town Council strongly objects to the applications Shropshire 19/05560/OUT and Telford & Wrekin TWC/2019/1046

Much Wenlock Town Council's objections to these applications are formulated under the following headings and are expanded on further below:

- Ironbridge Gorge and the Ironbridge Gorge World Heritage Site
- Heritage Assets and other designations
- Employment and economy of the Ironbridge Gorge and surrounding area
- Health provision being delayed due to the proposed mineral extraction processes on the proposed site of the Local Centre
- Highways and rail network implications
- Land stability
- Climate Change and carbon
- Mineral extraction - is it required?
- Viable commercial tourism alternatives
- Natural regeneration or lack of it
- Consultation process

References are made to policies of:

- Shropshire Local Development Framework Adopted Core Strategy March 2011
- Telford & Wrekin Local Plan 2011-203, adopted January 2018

and, in particular, information contained within both the above plans in relation to tourism and minerals policies

- Local Aggregates Assessments Shropshire Council latest 2016-2017
- West Midlands Aggregate Working Party - Annual Monitoring Report 2016, incorporating data from January-December 2016, Revised Version January 2018
(Chair of this working group was Shropshire Council Officer Adrian Cooper, who was Team Leader, Environment and Economic Policy)

Objections

Ironbridge Gorge World Heritage Site

Ironbridge World Heritage Site is a very short distance to the east of the proposed Quarry extraction site. Ironbridge Gorge was designated a World Heritage Site in 1986 and was one of the first locations in the UK to be so designated.

Ironbridge is clearly of “Outstanding Universal Value” to receive such designation. The Ironbridge Trust also identifies that a responsibility is placed upon the community and country within which it is located to care for and protect the site on behalf of the wider global community and future generations.

Whilst the Ironbridge World Heritage Site is mainly within the Telford & Wrekin authority area, this proposal is adjacent to that World Heritage Site and due regard must be given to those duties of care and protection.

We therefore object to the proposal to establish a considerable residential site (Residential 108.4 acres or 44 hectares, Employment 15.3 acres or 6.2 hectares, Village Square Development 4.7 acres or 1.9 hectares, Primary School 4.7 acres or 1.9 hectares, Leisure and Tourism 7.2 acres or 2.9 hectares). This appears to be a residential development foremost in very close proximity to the Ironbridge World Heritage Site. Residential is indicated as 44 hectares whilst the rest of land use combined gives a total of 12.9 hectares or 29.3% of the 44 hectare residential development.

Responsibility for policies in relation to the Heritage site lies with Telford & Wrekin, but Shropshire Council and Councillors also appear equally responsible in relation to such care and protection on behalf of us all and the wider global community.

Approval of this application would, in our opinion, fail to show due regard to these crucial roles that both Council Officers and Members are charged with on our behalf.

An analysis of the development hectares would appear to show that rather than the initial indication of regeneration of the site the application is now very much one of a residential development.

With over 1 million visitors estimated to visit the Ironbridge Gorge World Heritage site each year, Members faced with the decision must serve the Gorge well and provide support to the many businesses and individuals already employed in the area. Will tourists wish to view a large quarry complex as they descend Buildwas Bank towards the World Heritage Site, followed by a large residential development? Will such a sight have a detrimental effect on the vitality and economics of the Gorge and the surrounding area such as Ironbridge, Broseley and Much Wenlock?

Our answer is: “Yes, we believe it will have a detrimental effect”. It is therefore incompatible with Shropshire Council’s Core Strategy in relation to Market Towns and Key Settlements, which is clearly intended to offer support to, and not hinder, economic and commercial development in key centres, such as Much Wenlock.

We object under Shropshire’s Local Plan Policy CS3 The Market Towns and Other Key Centres
Telford & Wrekin Local Plan Policy BE3 World Heritage Site.

Designated Heritage Assets and Other Designations

Within a 1 kilometre buffer zone of the proposed site there are two Grade I Listed buildings and 11 Grade II Listed buildings with considerably more within a two kilometre buffer zone. Buildwas Abbey, a scheduled Ancient Monument (source ID 1015813 English Heritage Legacy ID 27545 scheduled date 8.2.1915 and last amended 14 March 1997), is so close and set just a road’s width across the A4169 to the site. We also note that Bridge House, a Grade II Listed building in Buildwas Road, will view, for a number of years, a significant quarry undertaking and associated infrastructure followed by, if the developer is successful, a considerable housing development.

There can be very few planning applications that come before Councils in such a heritage asset rich area as this one.

Approval of this application in such an historic and heritage sensitive area cannot, and should not be granted. This is a very sensitive environment and heritage rich locality and alternative sites for residential development are readily available nearby in far less heritage sensitive and environmentally damaging areas with well supported infrastructure.

We object to this proposed development on heritage asset and environmental grounds.

If the considerable heritage assets in such very close proximity to the proposed site are felt insufficient in value to reject this site proposal, then due consideration should also be given to the very close proximity of the designations shown in Landscape Designations, compiled by Heatons, the agents dealing with mineral extraction application Shropshire 19/05509/MAW:

Ironbridge World Heritage Site

Local Nature reserve

Scheduled Ancient Monument (Buildwas Abbey)

Ancient Woodland

Site of Special Scientific Interest (SSSI)

Area of Outstanding Natural Beauty (South Shropshire AONB)

There can be very few locations where so many designations meet and in such close proximity to the proposed development.

These designations alone, we suggest, warrant rejection of the proposals and if it is demonstrated there is a requirement for a predominately residential led development site in the locality, then much less sensitive locations can and should be explored as listed in the Telford & Wrekin Council Local Plan.

We object under Shropshire Policy CS17

Telford & Wrekin BE4 Built Environment and Heritage

Employment and the Economy of the Ironbridge Gorge and Surrounding Area

Shropshire Council presented information at MIPIM 2019 (a developers' exhibition in Cannes, France, during March 2019) referring to Shropshire Development Opportunities in relation to the intended development at Ironbridge. Local attendees included representatives from Shropshire Council and their partners and sponsors including Harworth, Berrys, Morris Property, WSP, Montagu Evans and LDA Design.

It was indicated at that time that 4,520 full time jobs would be created as a result of this site being developed. It is indicated in the outline planning application that this figure is now 622 (3,898 or 86.2% fewer fulltime jobs). This is further reduced to 546, an 87.92% reduction, in documentation submitted with the application at Ironbridge Masterplan 10.3 Resources. These figures are not explained but they do indicate a very considerable drop in the estimated employment prospects for the development which would have been seen initially as a considerable uplift and economic benefit to the area.

Much Wenlock Town lies just 3 miles to the south of the application site and has a shared mutual interest in the economic well-being of the Ironbridge Gorge, which is very reliant on tourism (information given as 1 million visitors per year). Our parish boundary is within yards of the site so we have well held concerns about the proposals.

Market towns and key centres, such as Much Wenlock, are under considerable pressure to survive in business terms and any interference, particularly with the tourist traffic to and from Telford and the Ironbridge Gorge, will, without doubt, have a detrimental effect on small businesses in Much Wenlock and surrounding areas. This proposal has the potential to cause economic damage to businesses within Much Wenlock and its hinterland.

Comparison of Employment and Housing Development

The indication from Harworth, and what Invest Shropshire are still advertising, is that there will be 4,520 FTE jobs and 20 hectares of employment land. The Invest in Shropshire article has clearly been prepared recently as details of the application are referenced in the article. That information appears contrary to the details contained in the application.

The total employment development area is indicated as 6.2 hectares, not 20 hectares, and employment is indicated at 546 and not 4,520 FTE.

Analysis

Public relations material information compared to the actual application.

Information in relation to employment is of relevance to regeneration or residential development. Public relations material from Harworth in the early part of the process and in particular at a joint presentation prepared for the MIPIIM Development Conference in Cannes, France, in March 2019, indicated an employment level of 4,520 FTE and an employment development area of 20 hectares.

Even at the time of submission of our objections, publicity material by Invest Shropshire outlines the planning applications and indicates the development will provide 4,520 jobs and 20 hectares of employment land.

But this is not the reality of the actual planning submission and we therefore question whether this is a regeneration project with a considerable increase in local employment prospects or is the balance for a large scale housing development project.

The application shows:

7.1 Uses – Uses and Associated Areas		
Housing development	44 hectares	
Employment development area	6.2 hectares	
Total of village square, primary school and leisure and tourism development areas	6.7 hectares	
Employment area plus village square, primary school and leisure and tourism development areas	12.9 hectares	Which equals 29.3% of the housing development area

Reducing Employment Numbers		
4,520	Number of jobs stated in original information	
622	FTE jobs indicated in the actual application at item 17 of the application form	
546	FTE jobs stated on the Masterplan at 10.3 Resources, Design and Access part 14 (Homes and Building Resources)	A reduction of 3,974 or 87.9%

We object under Shropshire Adopted Core Strategy, Policy CS3 The Market Towns and Other Key Centres and CS13 Economic Development.

Health Provision

In some press reporting on the development, there is mention of a Health Care Medical Centre. No such facility appears to be part of the outline application for the site (Shropshire: 19/05560/OUT and Telford & Wrekin TWC/2019/1046). The application for mineral extraction 19/0550/MAW is also crucial to health provision in relation to the outline applications, in that the health centre, if provided, would only be built in the local centre after the completion of the mineral extraction.

In Part 1 of the Masterplan Chapter 1, at 1.5 Ten Design Principles at page 12 of the outline applications, there is a reference which reads: *“A new medical facility for a range of Healthcare needs could be established at the heart of the Village Centre”*. (We note the word *could*).

In the Planning Statement on behalf of Harworth Group PLC at Page 35 5.22 appears to be the only other reference and reads:

“5.22 The applicant has entered into discussions with local GP practices as well as the Clinical Commissioning Groups. The illustrative Masterplan includes a local centre, whereby provision has been made for a new medical centre, should this be required. Further discussions will be held with the CCGs following submission of the planning application, as to the latest position and likely requirements for a new medical centre as part of these development proposals.”

We believe the requirement to include health provision on such a considerable development must be seen as a high priority before, or very early in, any development process and must be a crucial factor in relation to such a large scale development.

The same Planning Statement at page 32 it refers to the construction of the local centre, which they indicate will be determined by the usage of the stockpiling area for sand and mineral extraction (which is, of course, over at least a 5 year period). It is clear that the local centre will only follow on after the expiry of the quarry facilities.

Where will health care facilities be provided whilst the suggested location, that is, the local centre, is awaited following the expiry of the timescale indicated for the provision of the quarry? The implication is that if the application for the quarry is approved, then the Health Centre will, even if required, not be provided until 5 to 7 years have elapsed.

We understand that local surgeries in surrounding, nearby locations are full. We note the objection on behalf of the local medical practices of Ironbridge and Much Wenlock & Cressage. It is indicated that no consultation has taken place with either of those local medical practices.

Highways

We note that reports on highways have been prepared by ADC Infrastructure in relation to both the outline application and the mineral extraction.

The Transport Statement in relation to the mineral extraction on page 6 at 2.10 reads:

“The results of the Traffic Survey show that the A4169 Much Wenlock Road is relatively lightly trafficked with a maximum of just 797 two way vehicles in a peak hour. This equates to approximately 13 vehicles per minute”.

This, of course, is the use of data but takes no account of the type of road with conditions such as the bends/white lines/corners, etc, which must all be relevant in practical traffic network management areas of consideration.

Such statement also fails to identify that in the late 1980s to early 1990s this lightly trafficked A4169 very narrowly missed out on a by-pass around Much Wenlock. Hodnet, located in North Shropshire, was the chosen location for such a by-pass but Much Wenlock clearly had traffic issues, even at that time, to justify inclusion in the bid application.

We are therefore surprised and very concerned that WSP Highways, Consultants to Shropshire Council, have not apparently identified these as factors of concern in relation to all these applications, in particular, the background and historical highway facts of the area, especially the A4169.

There is no reference by WSP to the Much Wenlock Neighbourhood Development Plan. The Much Wenlock Neighbourhood Development Plan states that "Heavy vehicles pass through the town on a daily basis in connection with quarrying operations and the use of former quarries for haulage and industry. In addition, bridge and road weight limits bring considerable volumes of heavy traffic through Much Wenlock on the A458 and A4169." Given the importance of the Much Wenlock Development Neighbourhood Plan in planning terms, we would have expected some reference to this document.

We still cannot see confirmation of the condition of the Buildwas Bridge, which is absolutely crucial to any development in this area.

On the A4169 section known as Buildwas Bank there is no mention of the gradient average of 6.1% or the maximum of 7.6%. These are factors relevant to the intention of the developers to place traffic light control of the junction. We do realise it is due to include a green lane for south bound traffic to Much Wenlock. However, this will still leave the danger of standing traffic at the bottom of such a steep gradient for westbound traffic.

There is no mention of the junction concerned not being visible from 200 yards back up the gradient due to a right hand bend. There is no mention of overruns of the junction due to that steep decline. These occur on a frequent basis and are well known in the area. There are also clues on the road surface, together with a dedicated floral tribute regularly replenished by the family of a lorry driver, who sadly passed away in an overrun situation.

There is no mention of the crucial strategic role Buildwas Bridge plays in relation to contingency planning as one of the only crossings of the River Severn between Atcham Bridge and Bridgnorth Bridge which remains open and accessible. We have requested details of such contingency planning and the role that Buildwas Bridge plays in those situations.

We are aware that we have received reports during the month of February 2020, when storms have resulted in high river levels on the Severn, of stationary traffic from the Rock House, an ex-Public House at Farley, to Buildwas Bridge, a distance of 2.1 miles on what is described by consultants on behalf of the developer as a lightly trafficked road.

On such a road where access to and from Much Wenlock and the considerable hinterland can be urgently required, clearly Buildwas Bridge is essential to the well being of the area.

It clearly is of strategic importance to the developer where all traffic movements except public transport, cyclists and pedestrians, will be directed in and out of the development on to and from the A4169.

Equally, and on a much larger scale, Buildwas Bridge and the A4169 are essential to the community of Much Wenlock, Much Wenlock Hinterland, Broseley, Bridgnorth and even Shrewsbury and Telford. In the February 2020 flooding events, all these area traffic flows to, from or around were funnelled to the Buildwas Bridge. The bridge plays a crucial role in terms of traffic flow and wellbeing and protection of a widespread population. This increase in traffic flow is an indication of the crucial element Buildwas Bridge plays in open access across the River Severn over a considerable distance. Any further increase in traffic using the A4169 and Buildwas Bridge as indicated in the developer's highways reports will increase the risk, particularly in relation to medical emergencies occurring on the south side of the river but reliant on response from ambulances often based in Telford and on the return to the Princess Royal Hospital, Telford, which are based on the north side of the river.

To those who say "but that's not often", listen to the Government, Environment Agency and leaders of both Shropshire and Telford & Wrekin Councils, who all indicate higher levels of flooding and more frequent flooding in years to come.

We are therefore very disappointed that WSP, who are Shropshire Council's Highways Consultants, have not made reference to these as issues. These are well known and documented facts.

We believe another consultation is required by an independent consultant such as the Transport Research Laboratory.

We also believe the expertise of West Mercia Police should be called upon.

It is noted that other local Parish Councils have objected to the application on highway issues. We fully endorse their objections and consider the likes of Cressage, Leighton & Eaton Constantine, Buildwas, Atcham and all parishes down the Corvedale will suffer detrimental travel consequences and emergency response issues if these applications are approved.

The data for all three traffic submissions also appears to have been interpreted without the inclusion of what may well be a considerable traffic generator, that is, the proposal of a Park and Ride facility, the size of which is not indicated. Just what the Park and Ride proposal will generate in traffic movements is not known, but what is known is that there is considerable scope for car parks underneath the overhead power lines, where there will be no development beyond car parking.

The Transport Access statement at 10.1.10 does, however, identify 3 locations on the “lightly trafficked” A4169 road, where there will be a requirement to provide off-site highway improvements. The report reads:

1. *A4169 Buildwas Bank/Much Wenlock T-Junction, it is proposed to provide traffic signal control, including pedestrian crossing infrastructure.*

2. *Subject to the results of the TSTM, the A4169/Castlefields Way roundabout would require mitigation. (suggesting partial signalisation)*

3. *The A4169 Smithfield Road approach to the junction with the A458 Victoria Road would experience delay in the 2036 background scenario, which would worsen due to the addition of 48 two-way development trips in a peak hour. Whilst this is not a significant increase in traffic the junction is constrained and therefore sensitive to changes in Traffic Volume.*
Therefore, subject to the results of the TSTM, mitigation proportionate in scale to the amount of additional traffic added by the development should be provided. A scheme which improved functionality through better road marking, clearer sightlines and improved pedestrian infrastructure could be appropriate.

At 1: Such a proposal appears to be one which has not been at all thought through in that the A4169 falls steeply (average of 6.1% and highest 7.6%) into the bottom of the Gorge and the proposals will result in standing traffic at controlled lights at the bottom of that steep fall. Traffic flows, particularly through the junction westerly toward Buildwas village, Leighton, Eaton Constantine, Cressage, Atcham, Shrewsbury, will be at considerable risk whilst they are stationary.

This junction is already known for over-runs and the speed of vehicle approach and such standing traffic will result in what is often referred to in traffic management circles as the theory of “seeing and not perceiving”. In recent media discussions this is exactly what is being seen on dash cam footage in relation to the casualties being reported on what are known as “Smart Motorways”. The theory is that the driver sees the obstruction but it registers in the brain that the vehicle is moving. Once registered, it is difficult to change that response but the vehicle is actually stationary and thus a collision (often serious) occurs. The control method of traffic signals in this location will result in standing traffic and will lead to considerable risk of such collisions. This must be spelt out to the decision makers in relation to the application. It would be reckless to place such control in a location where over runs are well known. This is more than a highways issue - it is clearly a Public Protection matter and we are raising this with other bodies which do not appear to have been included in the consultation process.

At 3: This is what we know as the Gaskell Corner, Much Wenlock.

It is indicated that it was agreed on 11th January 2019 at a meeting with Shropshire Council and Telford & Wrekin that the Telford Strategic Transport Model (TSTM) would be used to assess the impact of the proposed development. The TSTM network coverage has been expanded to include Ironbridge, the development site and parts of Shropshire local to the site. The base model developed is complete and the validation and calibration has been agreed with Shropshire Council and Telford & Wrekin.

(Highways England have raised questions on the Telford & Wrekin Council submission in relation to the TSTM Model and the use of such - see Telford & Wrekin TWC/2019/1046 for details)

Much Wenlock Town Council has already written indicating this is not acceptable in that the Strategic Route A49 between Shrewsbury and Ludlow is not included in the Model. The A49 is a Highways England road responsibility. They must know and clearly should know that Much Wenlock is the planned and non-planned diversion route in both directions for the A49 Strategic Highway.

It is totally unacceptable not to include that route in the TSTM model. Even without any such inclusion the Gaskell Arms corner will require remedial work. Including data for the A49 would likely identify a far greater work requirement than the present indication.

We would also wish to be assured that all the 21 roads closed in the Shrewsbury area and the 12 indicated closed in the Telford area during the flood events of recent months are included and modelled for closure in the TSTM model. The base time for those closures indicated in our request was made for 6pm on Monday 24th February, 2020, an evening which resulted in considerable congestion in the local Much Wenlock area where vehicles from Shrewsbury, Bridgnorth, The Corvedale hinterland and Telford were all funnelled in to Buildwas Bridge.

All these factors must be included in the TSTM model for the consultation to be at all meaningful. We assume that the strategic necessity of Buildwas Bridge has already been identified for flood Contingency Planning in any case.

The TSTM results are awaited but with the questions raised by Highways England this is likely to be delayed.

We do need to be assured that the A49 is included in the model. If it is not included then we consider the consultation is severely flawed in relation to Much Wenlock.

The two new access points to the development will involve a roundabout and a traffic light controlled junction in addition to the traffic light system at the Buildwas Bank junction. The roundabout is likely, particularly at peak flows, to see standing traffic in the direction of Much Wenlock, the extent of which may involve tail backs into an area of sharp bends.

All these highways aspects are relevant to the Quarry application and both the outline applications.

We object on Highways Grounds under Local Plans Shropshire CS7 and Telford & Wrekin C3.

Local Economy and the Resultant Effect of Highways Issues

The workforce of Broseley and Much Wenlock commuting to work in Telford & Wrekin is given as 1,380 or 32.1% of that workforce, and those from Telford & Wrekin who commute to Broseley and Much Wenlock for their work are given as 391 or 19.5% (2017/2018 figures). These individuals will be severely restricted and will incur far longer time scales for their journeys to their employment.

This also applies to other traffic movements such as hospital visits, shopping, etc. and the commuters travelling to Wolverhampton and parts of the West Midlands.

It has the potential to cause severe economic detriment to the economy of Much Wenlock which, due to such a development, might well have viewed it to be the opposite, where the work opportunities and increased potential customer base should be positives. Unfortunately we believe it not to be the case.

The situation on the A4169 with so many potential traffic congestion points, i.e. five within a short stretch, which is a mere 3 tenths of a mile long, is likely to negate any potential economic uplift and must be addressed (see our map representations attached).

Rail Network

Whilst Network Rail indicate they have been in liaison with Planning Officers and the developers, there are no indications at all in the public domain that any agreement has been made by Network Rail to provide a rail service to and from the site.

An article contained in a parish magazine circulated in the villages around Cressage by the local Member of Shropshire Council for the area indicated an agreement had been reached and that one train would run each day. We have sought to confirm such information, which was not in the public domain. It appeared that the information shared by the Member to some people was correct and such agreement had been reached. When we requested finer details of the agreement reached and the circumstances of that agreement, we then had a response indicating the meeting was actually not about trains but about electrified units using the rail line.

Since then we have received a correspondence indicating that Network Rail does intend refurbishment of the Albert Edward Bridge and to a standard that will allow freight traffic: "After the work has been completed the bridge will be returned to its published capacity, in simple terms for operating freight services." Logic says: "why on earth would you invest public money (Network Rail being a public company) in refurbishing to a level of freight use when a lower use level of refurbishment (such as a cycleway) must have been an option? Why would you want to revenue a freight line to a thousand houses at the end of that line?" Unless there are other plans in place or under discussion we fail to see the logic, but this is clearly a lifeline for Harworth in relation to the removal of 1.9 million tonnes of sand and gravel.

We indicate in our objections to the quarry application 19/05509/MAW, that this sand and gravel is not required to be extracted at this site in that there is a landbank supply of 16.9 years (legal requirement 7 landbank years) available from the 5 operational sites of the 11 sand and gravel quarries consented in Shropshire and Telford & Wrekin with considerable reserves in far less heritage and environmentally valuable locations within both areas.

There is absolutely no requirement to grant another quarry application, in our opinion, but, of course, this is essential to allow Harworth to develop on the 106 acres of greenfield land.

We object in that the application is premature with no legal contract in place with Network Rail. Under Shropshire Mineral Policy CS20 and Telford & Wrekin Mineral Policy ER4 Sand and Gravel Resources there is no requirement to abstract sand and gravel over and above the considerable landbank already available to the two authorities, which is over double the legal requirement for a sand and gravel landbank.

Land Stability

The Ironbridge Gorge has a considerable known history of landslides and references to land slippage are made in the 70 page document "Ironbridge Power Station - site wide desk based Landslide appraisal by RPS on behalf of the applicant (outline)".

Ironbridge Gorge, at a location just opposite the application site, was one of the first recorded landslips, or was it an earthquake, in May 1773, just after recording of earth movements began. The land movement resulted in the River Severn being blocked for two days, which is an indication of just how unstable this area can be. Large scale interference by the removal of sand and gravel is of concern.

A copy of an article on the event, produced by the University of Nottingham, is attached.

Page 16 of 29 of the Geo Report, which is part of the documents provided, indicates in a map form the site area itself and to the north of the site. The colour-coded map indicates areas of:

- C** Possibility of slope instability problems after major changes in ground conditions
- D** Significant potential for slope instability with relatively small changes in ground conditions
- E** Very significant potential for slope instability. Active or inactive landslides may be present.

Such instability is evident again on the Buildwas Bank road in several areas. These are all crucial factors in regard to this application.

Telford & Wrekin are well versed in relation to stability issues in the Gorge and their expertise will no doubt address such issues, but we highlight concerns we have in relation to such slips and also the possible effect of the removal of 1.9 million tonnes of gravel from the south side of the River Severn opposite the higher level landslide hazard areas identified.

Policies in relation to Minerals are also relevant to the outline applications. The mineral abstraction plan appears to be an enabler plan.

Our understanding from attendance at consultation events is that the 1.9 million tonnes of sand and gravel has to be extracted, as it is a strategic reserve, before any housing can be built on what is presently greenfield land used in agricultural production. Housing cannot be allowed until that aggregate has been removed.

Once the sand and gravel is removed then the developer will be able to build a considerable amount of housing. So the sand and gravel extraction is clearly to allow housing development.

Early indications were that all sand and gravel extracted and, indeed, all pulverized ash on the site would be removed by rail. We now understand the wish at present is to remove 75% of the sand and gravel by rail and the remaining 25% by road. As indicated, we can see no evidence that any agreement has been reached with Network Rail to provide the rail service over the Albert Edward Bridge to link to the National Rail Network.

This is such a crucial and essential issue that we consider the mineral extraction application has been made prematurely and should be revisited by both Shropshire Council and Telford & Wrekin Council if and when such formal agreement is in place with Network Rail and the work required has already been carried out to ensure compliance.

Shropshire and Telford & Wrekin Local Plans have sections on Minerals and both Shropshire Council and Telford & Wrekin work jointly in relation to Minerals.

Telford & Wrekin Local Plan 2011-2031 Section 10 Page 151 at 10.2.2.3, under Maintaining Aggregate Supplies, reads as follows:

“For Sand and Gravel working the latest LAA data for the sub region shows that in 2015 there were ten permitted sites for sand and gravel working in Shropshire, 5 of which were operational. The LAA data shows that at 0.73mt sand and Gravel production in Shropshire and Telford & Wrekin in 2015 has significantly recovered from recent years and is now above both the ten year rolling average for sand gravel sales (0.69mt) and the 3 year average (0.67mt). The LAA data also demonstrates that the landbank of permissions for sand and gravel working has remained consistently above the minimum level required by NPPF of 7 years. The permitted landbank of permissions was equivalent to about 15 years production in 2015.”

Such landbank details are confirmed in the updated Revised Version January 2018 West Midlands Aggregate Working Party Annual Monitoring Report (copy of some of that report attached). Table 5, in particular, indicates Shropshire (and Telford) Sand and Gravel Landbank as 16.9 years as at 31.12.2016 based on 10 years average sale.

With such a considerable landbank of sand and gravel, well above the required legal 7 years, we cannot see any reason to permit such a quarry application, particularly in such an environmentally sensitive and heritage rich area.

We clearly understand the economic benefits and the enabling of development potential which the Harworth Developers require but we do not believe that these economic benefits to the Harworth Group can be allowed to outweigh the detrimental economic effects and the detrimental environmental effects this application will have in the Ironbridge Gorge and the surrounding areas such as Much Wenlock.

We object that there is no requirement at all to extract the 1.9 million tonnes of Sand and Gravel at the proposed site under Policy CS20 of the Shropshire Local Plan and ER4 of the Telford & Wrekin Local Plan.

Climate Change and Carbon

It must be indicated that these objections are submitted very shortly after the Court of Appeal judgement of the 27th February 2020 in the case of R (Friends of the Earth -v- Secretary of State for Transport and others) Case Number C1/2019/1154. In short, the Heathrow airport proposal to expand.

Reading some initial reaction to this major decision in relation to climate change agreements (Paris, in particular) and the national commitment to what is now titled UK Net Zero (Climate Change Act 2008 (2050 Target Amendment) Order 2019 laid before Parliament 12.6.2019) it appears that such judgement does have possible implications in other development projects.

It is possible that it may be necessary for us to return, outside of the official consultation period, to address issues which we may believe have become relevant from that judgement to these applications. As it is, the time constraints on consultation on these two such large applications involving the quarry and the outline applications make it impossible to consider the relevance of that judgement in such a short time scale .

Our initial objections, however, in relation to climate change are in relation to air quality.

The Paris Agreement, Climate Change Act, National Targets toward a Net Zero UK and both Shropshire Council and Telford & Wrekin Climate Change targets and policies aim for net zero by 2050. In particular, Statutory Instrument 2019 Number 1056 Climate Change, laid before Parliament 12.6.2019 and passed into legislation on the 26.6.2019, is formulated with the intention to actually reduce emissions to net zero or the other term in use, neutral positions. In fact, the target was changed in the period between being laid before Parliament until the Statutory Instrument The Climate Change Act 2008 (2050 Target Amendment) Order 2019 was implemented from 80% to 100%.

Then we read the application's Environmental Statement Air Quality 11.5.19 at tables 11.16 (and other charts). For instance, R11 Receptor is indicated as a change of plus +2.7 and the marked impact "Slight Adverse", but also all the table of receptors are actually plus + even those in the close proximity of schools according to Scenario 6 : 2038 Completion Year with Development.

The agreements and climate change commitments appear to us to agree to reductions, not increases, and even labelling the impact as “negligible” is surely not the point. The point is all the readings should show a downward and not upward level.

What level of consultation has been undertaken with those people living or working at the indicated Receptor locations? Are those people aware of the possible negative reading/s in relation to the level of air quality they will experience? Our limited research indicates those people are not aware and have not been consulted. These are people, not just buildings.

We object under Shropshire Council Policy CS17 Environmental Networks.

In respect of climate change we are, however, pleased to see the indications of Severn Trent, which clearly outline their stance in relation to carbon and their climate change commitments:

“Severn Trent would like to comment on planning application 19/05560/OUT and TWC/2019/1046 for the development of the former Ironbridge power station. We have been in communication with Harworth regarding suitable methods of wastewater collection and treatment from this site and have conducted a number of sewer capacity assessments to assess the impact of the proposed flows. The results show that there is very little capacity in the existing sewerage system even for a small proportion of the development. The connection of additional flows from this site is very likely to require extensive capital works to various pumping stations and sewer pipes along the route towards Coalport Wastewater Treatment Works (WwTWs) which follows the route of the River Severn. The ground conditions and proximity to sensitive habitats in this area are unfavourable for this type of work and have in the recent past proved very difficult and expensive to work in. Adding and upsizing pumping stations and pipes can require more energy and as a result more carbon. Given the climate emergency and carbon pledges that our organisations are currently working towards it is important that more sustainable options are considered. For these reasons we have proposed to Harworth that a suitable form of onsite treatment is considered as a means of managing wastewater at this site. It is disappointing that the detail of these discussions has not been made visible in their submitted drainage report as we have made a concerted effort to communicate and explore alternative and more sustainable options. For this reason we request that the drainage arrangements of this site are developed and reviewed collaboratively with Shropshire Council, Telford and Wrekin Council, Harworth, the Environment Agency and Severn Trent.”

Shropshire Local Development Framework Adopted Core Strategy indicates at 3 "The challenges we face" that in Shropshire we need to plan:

- A lower carbon footprint, ensuring development mitigates and adapts to the effects of Climate Change
- The protection and enhancement of our natural and historical environment, its character, quality and diversity.

We object to the application and do so in that the proposed development cannot be seen to be aligned to support those intentions.

A Vision for Shropshire at 3.3 Sustainable Community Strategy 2010 -2020 states the vision is a flourishing Shropshire and three priorities are set. Number 2 of those is on page 28 of the adopted Core Strategy and reads "2 Responding to Climate Change and Enhancing our Natural Built Environment

- Shropshire will be recognised as a leader in responding to climate change
- Working with Communities to prepare for and adapt to the issues that climate change may bring and ensure the rich varied environment is valued, protected and enhanced;
- Natural Resources, waste and water will be managed efficiently and we will adapt our needs to meet the changing demands of the climate".

Priority 2 makes it clear Shropshire Council's responsibilities in relation to Climate Change and Natural Built Environment. This application, if approved, we believe is contrary to the Council's stated Priority as given at 2.

Other objectors have, in our view, rightly identified Flooding, possible Land Slips and consequences of Mineral Extraction in the proximity to Environmental and Historical Assets.

Flooding, as we write this in March 2020, is of considerable concern both for local residents and indeed visitors, on whom we so readily rely to support our Communities. They are faced with headlines such as:

"Shropshire Flooding: Ironbridge remains under "Danger to Life" flood warning as more rain expected." (Shropshire Star 18.2.2020)

"Shropshire flooding: Call for increased £50m flood defences to protect Ironbridge." (Shropshire Star 19.2.2020)

Forty houses and buildings under emergency evacuation are all extremely serious and escalating issues. The extraction of Minerals which, we contend, is not in any way required with a considerable Landbank of Sand and Gravel available, could result in stabilisation issues and have serious consequences for groundwater reserves and the whole water eco system. This cannot, in our view, be allowed to be disturbed so close to an area so vulnerable to flood dangers and should not in any way be permitted.

We strongly object and believe approval would be contrary to the Adopted Core Vision and Core Strategy CS18 and we note under the Delivering and Monitoring of this Policy that planning applications with Environmental Agency Objections (AMR Core Output Indicator E1) will be used to monitor the effectiveness of this policy.

These applications do considerable environmental harm and do not meet and enhance in any way Shropshire Council's stated Climate Change ambitions. It could cause further issues with levels of flooding already at known dangerous levels. Shropshire Council are requested to reject this application There are better and less risky alternatives available.

Much Wenlock has had its own flood issues again in February 2020. So, we really relate to Ironbridge residents' concerns.

“Danger to life” warnings are not advised lightly. Forty houses and buildings are not evacuated lightly. A call for £50m permanent flood defences is not made lightly. A holistic approach to the whole of the River Severn, called for by the local MP, Daniel Kawczynski, is not made lightly.

Quarrying, followed by major development and particularly large-scale housing developments are of real and genuine concern and the indications are that such intense storm events as those in October 2019, January and February 2020 will be more frequent.

These are very serious factors for both Shropshire and Telford & Wrekin.

Viable Commercial Tourism Alternatives

CS16 Shropshire Local Plan Development Framework Adopted Core Strategy Tourism and Leisure (page 104)

Shropshire Council CS16 reads “Development of high quality visitor accommodation in accessible locations served by a range of services and facilities, which enhances the role of Shropshire as a tourist destination to stay. In rural areas, proposals must be of an appropriate scale and character for their surroundings, be close to or within settlements, or an established and viable tourism enterprise where accommodation is required. Where possible existing buildings should be re-used (development must accord with Policy CS5).

6.34 of that policy reads “The Ironbridge Gorge World Heritage Site which has an international reputation also helps draw visitors into Shropshire. The development of Tourism related uses that complement and reflect the World Heritage Site and add to the offer within Shropshire will therefore be supported as part of any redevelopment of the Ironbridge Power Station site”

Other parts of CS16 highlight the present and future potential of tourism facilities. The financial benefits of tourism to the local economy and the fact those are not one-offs, but a constant stream of benefits, are clearly recognized in Shropshire Policy CS16 and Telford & Wrekin Policy EC11, particularly 4.3.2.2, and Policy EC12.

In the Consultation Statement December 2019 titled “Land at the Former Ironbridge Power Station” by Pegasus Group on behalf of Harworth Group PLC on page 14 at 3.1, Feedback from Stakeholder Workshop in September 2018 it reads at the bottom item:

“Some support for Holiday Lodges, hotels - to support longer visits to the Ironbridge area” .

Much Wenlock Town Council runs regular surgeries and at one in recent weeks a member of the public attended to indicate just what they felt was a missed opportunity not to have some form of tourist resort as part of the Ironbridge Development. This would bring considerable financial input into the local economy of Shropshire and Telford & Wrekin both in the short and long term.

Such a resort development would also not require the local authorities to expand capital costs on the likes of the expansion of William Brookes Academy, a Health Centre and other local infrastructure. It would have considerable financial benefit in relation to the ongoing revenue cost streams for education provision and the revenue cost streams of the capital projects which, in the longer term, would likely outweigh the initial uplift in the Council Tax receipts from the housing developments.

We are, of course, not experts in the financial aspects, but the idea put forward appears to have merit and is certainly in line with Shropshire Local Plan Policy CS16.

Members of Much Wenlock Town Council are aware of the Bluestone Resort at Narbeth, Pembrokeshire, and at least one has visited this facility and so it came to mind when the feedback from the Council Surgery was received.

Bluestone, it should be indicated, is also included in the Powys Council Financial Strategy of 2016, which appears to be assuming such a site would be of commercial benefit to Powys.

Whilst clearly there may be a number of such resort providers, the growth of Bluestone is of interest and shows the potential of financial benefits to the local area.

In the case of Bluestone it is set within 500 acres of Pembrokeshire and started to be established in 2008 in what appears a diversification by a local farmer. In 2011 it was providing employment for 400 people. By 2020 that has risen to 750, with a wide range of job prospects. Bluestone is now the second highest provider of work places within Pembrokeshire.

Whilst it does not shout loudly of its green and climate related credentials, anyone who visits will know that a focus on climate change is an important aspect of its management. Most of the wooden lodges on site (there are a some brick facilities which were already in place) have space available to off load luggage, then vehicles are removed to the car park and any further transportation around the resort is by electric powered golf buggies or on foot. So climate / carbon friendly.

It is a major financial supporter to the local Pembrokeshire community with a 'purchase local' policy which is a considerable financial uplift to the farmers/butchers, etc in Pembrokeshire.

Again, we repeat, we are aware of Bluestone but other examples may be available.

What we say is that the tourism strategy of both Councils indicate a desire to provide such a facility and recognize the potential financial benefit of such facilities to both local economies.

We would suggest that this is a once in a lifetime opportunity to indeed meet the ambition of Shropshire Council Policy CS16 at 6.34 and Telford & Wrekin Policy EC12. It is a golden opportunity for both Councils and the surrounding communities who would benefit from tourism, which is so important, as outlined in CS16 and EC12.

There may, of course, be good reason why the developer has not indicated why the pre-application input at the Stakeholder Meeting of September 2018 has not been progressed. However, our submission is that in financial and certainly in climate change/carbon and social terms, both in the long and the short term, the possibility of such a resort in this outstanding area is or should be of essential consideration.

The developers, in alternatives, focus very much on their housing model which, with their retail warehousing appears to have been very successful, but we would maintain this area is very different. We feel we need to enhance the world asset we have nearby at Ironbridge and raise ambition for this development above a large residential development.

Such a suggested resort would also bring with it jobs which would exceed those now indicated in the applications which are, of course, far less than indicated in the original publicity, in fact 87.98% less.

We do request re-consideration and would support that with Policy CS16 and Policy EC12 as our evidence.

Natural Regeneration

The Environmental Statement headed Proposed Development and Alternatives at 4.4.3 to 4.4.5 under the No Development Alternative indicates the option of leaving the application site in its current use and physical state.

That prospect may fill many with horror but if we look to the Ruhr Valley in Germany and elsewhere in Europe that option would be an opportunity to allow for natural regrowth and regeneration as exemplified in the book "Under the Open Sky - Emscher Landscape Park" (Library of Congress Central Number 2010923014, Copyright 2010 Birkhauser GmbH, Basel, Switzerland).

Details are given in relation to the incorporation of the natural regeneration of Industrial Land, in this case in the Ruhr Valley, over a length of more than 85 kilometres, but there are also sites elsewhere within Europe. This was achieved after the end of coal and steel production in areas with waste land and spoil tips often next to residential areas. Features of that industrial era have been maintained and incorporated into parkland and many other regenerated areas.

Natural regeneration is, of course, in line with the principles and targets set in Climate Change agreements and policies. It is often far cheaper in financial input and is a Carbon bonus. Regeneration is also remarkably quick and achieved by the native tree, hedge and plant cover (as shown on a recent episode of BBC Gardeners World).

There appears no natural regeneration incorporated in the plans submitted with the applications.

Natural regeneration can be very successfully incorporated in the regeneration of industrial areas with remarkable results so the site without development is still a very viable proposition.

Consultation

The two considerable applications (Quarry and Outline) were submitted on the same day, 19th December 2019, which, of course, is very close to the Christmas holiday period.

The consultation period commenced early into the new year and there was some confusion with the Quarry application with an indication to neighbouring parishes of end date 14.2.2020 but the application site stating 20.2.2020.

Both outline plans to Shropshire and Telford & Wrekin end on 6.3.2020. (We note Telford & Wrekin's extended consultation from 6.3.20 to 20.3.20).

For anyone wishing to take part in the consultation process it has been extremely difficult with, apart from one short document, all relevant material in relation to the applications only available online or a few hard copies at distance, or at considerable personal cost.

We have received complaints about this aspect and we must agree it has been unacceptable in relation to issues with the considerable difficulty of following the continuity of the application on the Shropshire website. This has been easier on the Telford & Wrekin website but confusing on the Shropshire website.

The Shropshire website, as we found out ourselves, was prone to server errors and if a document was read then when returning to read the next one it was frustrating to find you were timed out and had to commence the process again.

The Telford & Wrekin website was found to be a more reliable system but, of course, did not display the Quarry application. Even that has had issues in the final week of consultation in relation to the application plan outline, where it has been difficult to open the plans. This has been addressed with Telford & Wrekin.

The process of consultation adopted has been very frustrating. This has been made harder by three separate points of application and computer systems that struggle to provide an adequate system to make responses in a very short time scale to developments of considerable size and complexity.

Harworth consultations are listed. Members who attended public presentations have found them, for the use of a better word, 'compartmentalised'. As an example, Heatons, on mineral extraction, knew what was intended in relation to minerals but were unable to indicate how this fitted in with the removal of the considerable amount of pulverised ash or the commencement of the building of the first 250 houses all occurring at the same time. A number of responses appear to indicate that consultation has been varied and it will be a matter for planning officers to consider the level of such consultation.

Appendices

Shropshire Local Development Framework: Adopted Core Strategy March 2011
Parts which appear relevant to our objections

Telford & Wrekin Local Plan 2011 – 2031, Adopted 2018
Parts which we consider may be relevant

Maps from Application:

- Designated Heritage Assets
- Landscape Designations
- Block Phasing Plan
- Masterplan Enabling Scheme
- Uses

Local Aggregates Assessment Shropshire Council
Latest assessment 2016 – 2017, page 4

West Midlands Aggregate Working Party Annual Monitoring Report 2016, incorporating data from January – December 2016. Revised version January 2018
Parts which we consider may be relevant

Georeport – Maps of potential for natural landslide

Much Wenlock Town Council map indicating Harworth Road Proposal A4169
Shropshire Development Opportunities MIPIM 2019 Invest Shropshire (extract)

Shropshire Council Press Release 27.02.2019 regarding MIPIM 2019

Invest Shropshire Current Developments Former Ironbridge Power Station – publicity information

10.3 Resources from application, pg 9, gross jobs indicated as 546

Buildwas Bank in relation to highways, gradient information

University of Nottingham Buildwas Earthquake of 177: an Earthquake or a Landslip

Book reference 'Under the Open Sky' re-naturalisation in the Ruhr Valley, Germany

Information on Emscher Landscape Park

Information from Wikipedia on Bluestone, Pembrokeshire (a little dated – there are now 750 employees)