## WROCKWARDINE PARISH COUNCIL

TWC/2014/0113

Former British Sugar site, Allscott, Telford, Shropshire: Outline application for the erection of a mixed use development comprising of up to 470 dwellings (Use Class C3), a primary school (Use Class D1), a commercial area (Use Class B1), clinic and health centres (Use Class D1), retail units (Use Class A1), financial and professional services (Use Class A2), restaurant and cafes and/or hot food takeaways (Use Classes A3 and A5) with associated allotments, sport and recreational facilities, open space, biodiversity enhancement and layout (All other matters reserved).

This Council having taken account of all representations and views expressed to it resolve to oppose the proposed development at the former sugar beet factory site and will urge the Borough Council to refuse such consent for all the planning reasons which the Parish Council has heard by way of those representations made to it.

Notwithstanding this opposition, if consent is to be granted then the Parish Council will urge the Borough Council to negotiate a section 106 agreement incorporating the Parish Council's Traffic Group list of minimum requirements.

## **Objections**

The application is one requiring a special environmental impact assessment (the area is adjacent to the Conservation Area of Wrockwardine Village) and it is the view of the Parish Council that the probable impact on the existing junction of the M54 together with the additional developments (presently under consideration by the Borough planning authority) at Holyhead Road and Haygate Road (TWC/2013/1033 Land to the North of, Haygate Road, Wellington and TWC/2013/0938 Land off Holyhead Road, Wellington) will have an adverse effect on local B roads (which are in effect narrow country roads) and unclassified roads and the community as a whole. The comments on the applications for the former sugar beet factory site and the land at Haygate Road received from the Highways Agency are conflicting in their advice to the Borough Council; one stating that the development will have no immediate impact on the motorway junction and the other expressing concern that it will have an adverse impact.

There is considerable local opposition to this application which would, if successful, create a village outside the present boundary of the built up area of the Borough; effectively extending the present urban development of Telford well into the rural countryside. Because of the extent of the opposition to this plan along with the likely adverse consequences on the Conservation Area of Wrockwardine Village and other hamlets within the Parish of Wrockwardine we urge that you do not grant permission for this application.

The borough Council has, up until quite recently, insisted that the Local Plan (Local Development Framework [LDF], supported by Wrekin Local Plan "saved" policies was "current". Due to pressure from Central Government this no longer appears to be the case. Wrekin Local Plan "saved" policies H9, H10and H18 are quite clear that there should be no such propose development in Allscott. However it would seem that the National Planning and Policy Framework (NPPF) now overrules the LDF. It would seem that a direction from central government now excludes housing numbers where planning has been passed but development has not yet taken place. The Parish Council is at a loss to understand why this should affect what is in effect a rural area when there is clearly existing land available in the urban environment. The Parish Council feels that Local Government should, where practicable, question such directives from Central Government.

Assuming the NPPF is accepted as the overriding document then it still has to be proved that the development is sustainable. Northern Trust has set great store by its insistence that the development is sustainable: The Parish Council has not been convinced that this is the case.

It is the view of Wrockwardine Parish Council that to be truly sustainable the site should be sustainable as far as possible within its own environs: it should have little effect on its surrounding area, limit carbon dioxide emissions and provide an environment where people can work and play and if travel is necessary then this should be by public transport.

- 1). There is a proposal for a primary school. Is this really achievable bearing in mind the cost would come from local finances? How certain is the Borough Council that a school is practical bearing in mind the likely number of pupils. What happens when those pupils reach the age of 11years. The nearest secondary and tertiary education facilities are over 4 miles away. This will negate the argument of the site being sustainable.
- 2). 470 homes would equate to at around 800/900 adult residents. A sustainable development should provide jobs for the vast majority. There is no way this will happen in the rural area of Allscott. Despite the developer's comments about a business hub and possible retail developments very few jobs will be created. The vast majority of the residents of this estate will travel to work outside the development.
- 3). Wrockwardine Parish Council is of the view that a local shop on an estate of less than 500 houses will not be viable and would remain empty. It is unlikely that the Post Office would be provided; we doubt that in the present economic climate Post Office Counters Limited would approve post office facilities so that anyone requiring such services (parcel deliveries from home businesses in particular) would need to travel. We are informed that that the shopkeepers in Admaston would fear for their own business if revenue dropped because of this development. In any event the residents will still travel for the weekly shop to the supermarkets in Wellington and Telford. Again more travel by car. In addition, the nature of these houses, large and prestigious, would indicate that residents would be most likely to shop on-line and have their weekly grocery shop delivered to them from the large supermarkets thus creating additional incoming traffic again, this is contra to the sustainability argument.
- 4). A similar situation arises with the suggestion of a pharmacy attached to a health centre. Recent Government announcements indicate the closure of rural GP practices due to cuts in Government funding. In present circumstances this proposal would appear to be a non-starter and then of course the residents would have to travel some three miles to the nearest surgery and pharmacy putting ever increasing pressure on rural roads.
- 5). The proposal indicates the jobs that will be created during the construction phase and how this could provide work for 120 residents of Shropshire. Once again this information has been overtaken by events. The construction industry is now once again in full flow thanks the three Government housing schemes and latest reports indicate that there is a shortage of workers in that industry.
- 6). It is the understanding of WPC that the area is technically described as a flood plain. Little is stated in the planning application about the Sustainable Urban Drainage System. Many of the rural roads have suffered flooding year on year which indicates that ground water levels in winter are high. Natural springs are also common throughout the area. In regarding such circumstances what concern is there about "back-flooding" a phenomena that has occurred in other parts of the country this year which have never experienced flooding from natural watercourses? Admaston has also experienced sever back-flooding problems in the past.
- 7). The applicant expresses confidence in soil contamination. Has a full and independent survey been undertaken? One such application has been stopped because of leaching into the soil of a chemical used in the processing of beet into sugar. In addition BSC at one time sold top soil obtained from washing beet. That soil, which had been sprayed with Lindane (which became a banned chemical), was stored on part of the site. How confident are you that the site is safe?
- 8). The developers indicate a range of travel plan initiatives. The only form of public transport is the bus. The developers have apparently agreed to subsidise this for two years but what will happen then?

The Borough are currently reviewing bus subsidies with the threat that some will have to be cut. In Admaston when a large development took place the Local Plan indicated there had to be a 20 minute

bus service. Despite further large developments in Bratton and Shawbirch the bus service has been cut, firstly to 30 minutes and now to hourly. The law of diminishing returns applies and it will also happen if the development in Allscott takes place. Once again more pressure from car users on local and unsuitable roads. Whilst the Railway runs alongside the site it would seem there is little possibility of providing a halt despite the fact that the former Walcot station is close by. When the LDF was being prepared representatives of the Parish attended many consultation meetings and tried to instigate thought on a metro system from Shrewsbury to Wolverhampton and the opening of all the old halts/stations providing an alternative transport system throughout the Borough. Wrockwardine Parish Council also obtained a grant for a feasibility study to re-open Admaston Station but such a possibility was also ruled out because of prohibitive costs and because the timetables would not allow traffic into Birmingham. Cycling and walking from the proposed development site would be extremely dangerous.

The developers discuss the history of the site and ABF. There is no doubt that the latter were efficient and considerate employers. However they could afford to be bearing in mind the vast profits being made through subsidies. Once those subsidies came under threat the company had no compunction in closing 14 of its 18 factories with apparently no concerns for its workers or the farming communities supplying the beet. The company was also quick to flatten the factory buildings to save on Business Rates. It is now seeking to capitalise on the asset to the detriment of the area as a whole.

Sustainability was broached at the beginning of this report. The applicants argument appears to highlight the fact that because the NPPF is wide open to interpretation that the presumption of development in the rural area is satisfactory. Whilst PPG13 and PPG7 are now defunct we would draw attention to the true aims of sustainability.

PPG 13 1.8. Locate major generators of travel demand in existing centres which are highly accessible by means other than private car. This condition does not come near to applying to the Allscott site.

PPG7. An isolated new residential development in the countryside **may** be exceptionally justified if it provides live-work opportunities that will be integrated and a benefit to the surrounding community if it can meet **outstanding** high standards of sustainability.

Wrockwardine Parish Council does not think those "exceptionally high standards for the surrounding community" will be met if this application succeeds.

Network Rail has objected to the proposed development expressing concern over the safety aspects of an unmanned level crossing and the proximity of the proposed school site to the railway line.

Telford & Wrekin Council's Ecology Department objects to the scheme:

"Promoting Sustainable Transport

Paragraph 32 states that a transport statement or assessment should support planning applications where the development will generate significant amounts of movement. This should take account of opportunities for sustainable transport modes, safe and suitable access to the site for all people, and improvements to the transport network that will cost effectively limit the significant impacts of the development. Proposals should only be refused where the residual cumulative impacts of development on transport are severe. No transport statement or assessment has been submitted with the application. This will be needed in order to determine what the transport impacts of the proposed development will be.

Paragraph 35 states that developments should be located and designed where practical to:

- Accommodate efficient delivery of goods and supplies. This is a HGV route with several
  existing businesses accessing and using the B4394. Appropriate measures will need to be put in
  place to ensure that new traffic associated with the proposed development does not affect the
  operations of these businesses.
- Give priority to pedestrian and cycle movements. Consideration should be given as to how pedestrians and cyclists will be able to cross or travel along the B4394 to access the school and the playing pitches to the north west.

• Have high access to quality public transport facilities. The site is in a rural location with limited connectivity to other service centres for non-car users. Consideration will need to be given to the potential for better public transport routes, for example to and from Wellington. Comments should be sought from transport officers in regard to this.

In addition, paragraph 36 states that all developments which generate significant amounts of movement should be required to provide a Travel Plan. This is also not currently available but should be submitted by the applicants. A travel plan should be a 'living' document which sets out creative and innovative ways to encourage sustainable travel to, from and around the site, and a demonstration of the enduring viability of the development."

## Requests for section 106 agreement in the event that the application is approved

Relief Road

40 M.P.H. at entrance to the Parish at Walcott Bridge

30 M.P.H. immediately adjacent to the site

40 M.P.H. from site to Admaston.

Pinch point traffic lights at Railway Bridge at Allscott.

Series of Table Tops Admaston (east and west, by the crossing and at Admaston House)

The pedestrian crossing in Admaston; high intensity LED lights on the Belisha Beacon.

Series of Table Tops Wrockwardine

Chicanes Allscott/Rushmoor Lane. Pinch point between the old and new entrances to the sewage works.

Post development speed limit for Rushmoor Lane

Weight limit for Rushmoor Lane

Alteration to junction at Plough Inn

Adequate car parking provision for parents at the school

Footpath from Wrockwardine to Admaston

An expectation that existing public rights of way from the new development will be marked and maintained.

Traffic management should begin immediately the development is started, not upon completion of 25% of the development.

Aggregate deliveries should come to the site by rail to existing sidings otherwise, vehicles would have to access the site via Rushmoor Lane; all roads to the site are unsuitable.

Gateway features throughout the Parish.

Alteration to the junction site line at Longdon Halt to make safer.

Wrockwardine Parish Council is a statutory lighting authority – all street lighting in the proposed development to be handed to the Parish Council with a suitable maintenance bounty.

Wrockwardine Parish council should be considered for the transfer of playgrounds with a suitable maintenance bounty.

The Borough Council will receive a substantial sum of money in Housing Grant from the Government. The Borough should consult with the Parish Council and the Community to ensure that the community most affected by the development benefits appropriately. There needs to be a demonstrable gain from the Housing Grant passed to the Parish because it is the parish which will be left forever to deal with the consequences of the development. The Borough needs to be clear in how it intends to deal with this receipt.

Martin Goldstraw Clerk to Wrockwardine Parish Council