



## **Wrockwardine Parish Council**

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The Members of Wrockwardine Parish Council have considered the Local Plan proposals and collectively agreed this response for submission and consideration.

### **1. Consultation Process**

- a) There has not been enough publicization of the plan to residents within the area to enable them to be part of the consultation process. Many residents were unaware of the plans until these were shared via community groups or local newsletters. There has not been enough transparency about the plans.
- b) The Local Plan drop-ins should have given residents the opportunity to speak to council officers about the plan itself rather than being confronted with developers with full site maps drawn up promoting their schemes to residents. This led many residents to believe the consultation process as pointless as it appears the schemes are in advanced stages regardless of any input from residents.

### **2. Scale of Development**

- a) **Number of houses (rural)** – **Section 3.12** suggests that over the course of the plan period the Council are planning for around 1,212 new homes. Of this number over 827 homes have already been completed or have planning permission. This means the Council are planning for around 385 net new homes up to 2040. The proposals show over 1000 homes suggested for rural locations including Allscott and Rodington. Why are this many homes proposed when the plan suggests that only 385 are needed?
- b) **Number of houses (full plan)** – Overall, **Section 3.2** of the local plan proposal identifies 20,200 potential houses but identifies that 55% already have planning or are under construction so only 8,800 should be needed to meet the identified target equating to 441 per annum. The plan suggests that this includes apartments, retirement accommodation and extra care facilities so the extent of the proposed Sustainable Urban Extensions is unnecessary based on number of houses needed across the 20-year period, according to the figures in the plan.
- c) **Section 7.33** suggests that if a site proposes 100% affordable homes, the council will support the delivery of the scheme. Does this mean that areas outside of the Local Plan can be built on if the housing is all classified by the Council as affordable? Will the potential numbers for this be considered in the overall figures for the Local Plan to potentially reduce the scale of some of the other proposed development?

- d) The Local Plan seems to eliminate building opportunities in other areas. Wrockwardine Parish Council have recently supported Wrockwardine Farm in development proposals to support the sustainability of Wrockwardine but it appears that other bodies and individuals don't get an opportunity to put forward suggestions for sustainable development land. There are also potential opportunities to build smaller housing areas in villages such as Charlton to enable older residents to downsize but stay within the village which could ease the burden of larger housing estates being built in small areas. How has the land that has been identified for large scale development been decided and is there opportunity for smaller scale development to be proposed if supported locally?

### 3. Employment Land Proposals

- a) Overall, 160 hectares of employment land has been identified and, according to **Section 3.31**, 77 hectares already has planning so only 90 hectares is required to meet the overall target. However, there appears to be more than this proposed on the map with no clear indication of how this has been allocated and what the benefits of the specific industries proposed to those particular areas will be, e.g. Allscott – 3.3 hectares for employment at site 250 – what are the intentions with regards to this employment? How will the additional pressure of this on the B4394 be mitigated?
- b) Policy HO2 suggests 'meaningful employment land' but proposals for local Sustainable Urban Environments (SUE's) show small areas of industrial land without any specific clarification of how this will be 'meaningful employment'. What does this mean and what will be the purpose of this land and benefits to the new developments?

### 4. Infrastructure (Education and Healthcare)

- a) **Schools** – As of April 2023, 18 Telford & Wrekin schools were classified as being at or over capacity. The development of an extra 20,200 houses across the Borough will massively contribute to future problems of overcrowding in schools and have a detrimental impact on the quality of education that can be provided across the Borough. Studies have consistently proven that overcrowding in schools and classrooms has a negative impact on performance and behaviour. Policy HO2 mentions primary school provision amongst SUE's but is vague and non-specific in relation to numbers or timeframes, suggesting these can be 'offered as a phased approach' and 'off-site contributions to local secondary school'. This does not address the fact that schools are already oversubscribed and understaffed with wider national issues such as teacher recruitment and retention impacting on the possibility of provision and expansion of schools. There needs to be more consideration and planning for how children of the Borough are going to receive a quality education in satisfactory facilities.
- b) **GP Practices** – A Healthwatch Telford report in 2023 found that patients are still having difficulty getting appointments at practices across the borough. Nearly 50% of respondents (2477) rated their experience of accessing GP's as 'very poor'. This will be further impacted with the addition of the scale of housing proposed across Telford & Wrekin. There needs to be improvements made for accessing GPs before the implementation of this scale of development with reassurances to residents across the Borough that the standard of healthcare provision will not deteriorate further.
- c) **Hospital** – The SATH Trust deficit was £47.2 million in 2022/23 demonstrating the major issues that already exist within the local trust with regards to funding and resource provision. There have also been several alerts over recent months to avoid A & E due to it

reaching maximum capacity which will be further exacerbated by Future Fit proposals to move the main A & E to Shrewsbury. This is hugely concerning when there is a proposed increase of residents that could easily exceed 50,000 people with the number of houses proposed. Alongside this, there are huge national pressures such as a lack of social care provision, strikes etc. causing overcrowding in hospitals, delayed appointments and poor standards of care.

## 5. Infrastructure (Highways)

- a) **Road Surfaces** – There are many issues with road surfaces in and around the areas proposed for development including potholes, cracking and uneven surfacing. This will be further exacerbated with consistent access for construction traffic and create further risks to vehicles. The Council have identified that it is developers that have to improve the highway systems around developments, and this does not usually start until development is well underway as demonstrated at the current Allscott site. The roads were not fit for purpose until later stages of the development causing much disruption and confusion for drivers. Telford & Wrekin Council have also made it clear that they will not enforce the rules around highways within new developments until those developments are completely finished. With the numbers of houses proposed, this could cause massive disruption and danger on roads that are already in poor condition and have several other issues as outlined below.
- b) **Accidents A442** – There has already been a significant number of accidents on the A442 between Shawburch and Crudginton. The proposal for over 3000 more houses along this road will further increase the risk of accidents through the addition of many more vehicles, pedestrians and junctions. The likelihood of accidents increasing and more casualties occurring will be extremely high if road safety is not considered prior to any development beginning.
- c) **Speeding** – There have been many incidences of speeding in the areas surrounding the proposed development including the A442, B4394 and B5063. The addition of more cars will add to this problem and is also likely to increase the number of pedestrians around these areas posing an increased risk to life.

## 6. Infrastructure (Utilities)

- a) **Utilities provision** – Severn Trent Water have been under immense pressure with the increased flooding in recent months and have not been able to keep up with demand across all affected areas e.g. Rushmoor. The addition of this scale of properties across the Borough will further increase the need for a consistent water supply, sewerage, drainage etc. which it does not currently seem attainable for a supplier already struggling to meet demand.

## 7. Climate Change

- a) **Pollution** – Whilst there are proposals to mitigate pollution such as EV charging points, the scale of this development will inevitably contribute to pollution during both the construction phase and once the development is implemented. Whilst there have been suggestions towards a move to electric vehicles nationally, the deadline for this has already been extended and is not fixed and it is likely that petrol and diesel vehicles will continue to be in production and usage for many years to come.
- b) **Cycle paths** – Whilst there are proposals for cycle paths to enhance active travel, there are several issues with these including the fact that there will need to be significant improvements to roads both adjacent to and in the surrounding areas of the proposed developments to

enable these to be sufficient enough for people to travel to work and local centres etc. There is also the issue that the numbers of people who choose to travel in this way is not significant in relation to the proposed scale of development.

- c) **Public transport** – There are proposals within the developers plans that identify provision for bus travel but this is unrealistic and unachievable based on recent examples of service cuts with 15 services cut or reduced in 2023 due to funding issues. This has caused significant disruption to residents particularly in the Shawbirch and Bratton areas where there has been one of the largest cuts in service provision. Therefore it is clear that the developer’s proposals on this are misinformed and lack substantial evidence as the current public transport provision of buses and trains is woefully inadequate for an increasing population.
- d) **Flooding** – Over recent weeks, we have seen the substantive impact that flooding has had on our communities and it has caused some concerning effects in and around those areas where development is proposed. For example, along the A442 water residue from fields proposed for development has caused risk to vehicles and demonstrated that there is not sufficient drainage to support the water clearance from this land. The new Allscott Meads estate was recently almost completely inaccessible due to flooding in surrounding areas, highlighting the previous lack of consideration for this in the original plans for the site.

**Prepared by Members of Wrockwardine Parish Council:**

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