TWC/2019/1046
Former Ironbridge Power Station, Buildwas Road, Ironbridge, Telford, Shropshire
Cross boundary planning application for 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 (AMENDED ENVIRONMENTAL STATEMENT SUBMITTED)

APPLICANT
Harworth Group plc

RECEIVED
20/12/2019

PARISH
The Gorge

WARD
Ironbridge Gorge

THIS IS A CROSS BOUNDARY PLANNING APPLICATION THAT HAS BEEN REFERRED TO PLANNING COMMITTEE AS THE APPLICATION IS SUBJECT TO A S106 LEGAL AGREEMENT TO SECURE FINANCIAL CONTRIBUTIONS AND ON-SITE AFFORDABLE HOUSING.

Online planning file: https://secure.telford.gov.uk/planning/pa-applicationsummary.aspx?ApplicationNumber=TWC/2019/1046

1. SUMMARY RECOMMENDATIONS

1.1 It is recommended that this cross boundary planning application be approved, subject to a Section 106 agreement imposing appropriate planning obligations, conditions, informatives and, if required, Telford & Wrekin and Shropshire Council entering in to a Memorandum of Understanding relating to the planning obligations and other arrangements to ensure that the Borough Council receives an appropriate distribution of developer contributions as outlined in this report

1.2 That the Development Management Service Delivery Manager be authorised to negotiate and agree the terms of the Section 106 planning obligations and any Memorandum of Understanding and to finalise the conditions and informatives as outlined in this report

2. BACKGROUND AND APPLICATION SITE

2.1 The site subject to this application is located at the former Ironbridge Power Station, which the applicant purchased from Uniper UK Limited in June 2018, following closure of the power station in November 2015.

2.2 The majority of the site is located within the administrative boundaries of Shropshire Council. The remainder of the site (which comprises the existing site access from Buildwas Road) lies within the boundaries of Telford and Wrekin Council. An identical planning application was submitted to Shropshire Council (application reference number: 19/05560/OUT). Shropshire Council is therefore the lead authority for these cross boundary planning applications.

2.3 The site is located in the parish of Buildwas, but is recognised as an intrinsic feature of the Ironbridge Gorge due to its setting within the landscape of the Gorge on the river, it lies approximately 0.50 miles from Ironbridge (from the Buildwas Road site access to Dale End Car Park) and approximately 3.7 miles (as the crow flies) to the centre of Telford (Southwater). The application site is bounded to the north by the River Severn and covers an area of approximately 139.3ha. The site comprises land formally utilised as Ironbridge A and B Power Stations, together with associated uses, including redundant sports pitches, borrow pits, pulverised fuel ash, landfill waste tips, a rail siding and agricultural land. The western part of the site comprises agricultural uses.

2.4 The site is bounded by River Severn and then Buildwas Road to the north and east, and Much Wenlock Road (A4169) and thereafter, agricultural land to the west. Tick Wood and Benthall Edge Site of Special Scientific Interest (SSSI) is located along the majority of the application site's southern boundary with a small section included within the application site itself.

2.5 The scheduled monument Buildwas Abbey is located further west of the site on the other side of the A4169, and to the east of the site lies the Ironbridge Gorge World Heritage Site and Severn Gorge Conservation Area. On the eastern edge of the application site lies the Grade II Listed Albert Edward Bridge, which forms the westernmost limit of the World Heritage Site and Conservation Area.

2.6 Pool View Park is a residential and holiday park for circa 70 homes/lodges located to the south of the site boundary, and is the only occupied land use in the vicinity of the site, to the south of the river. To the north of the site, on the northern side of the River Severn are a cluster of residential properties, guest houses and a few static homes including Bridge Farm Guest House, Marnwood Property Guest House, The Firs Guest House and The Water Rat

Inn public house. And to the south east sits the Ironbridge Rowing Club adjacent to the southern limits of the Albert Edward Bridge.

2.7 A sand and gravel quarry is located to the north west of the site. A separate planning application for the extraction of minerals and the subsequent restoration of the western part of the application site has also been submitted to Shropshire Council (application reference: 19/05509/MAW). This proposal is not an extension of this existing site, but forms a new operation to enable this mixed use development, whilst appropriately removing this natural resource in order to prevent its sterilisation. It is anticipated that the total quantity of minerals to be extracted from this part of the site will be approximately 1.9 million tonnes, over a 5-year working programme, with approximately 75% of this material to be transported offsite by rail. Following extraction, the site will be remodelled to facilitate the later phases of the residential redevelopment subject of this application. Further details on this application are provided below at section 8.14.

2.8 At the time of submission of the application, the main buildings and structures on site comprised of four 115m high cooling towers, a 205m high chimney, turbine hall, National Grid building and a railway line. Dense woodland on a steep slope bounds the eastern part of the site, and to the south of where the main power station buildings and cooling towers were located. Since this date, the four cooling towers were demolished on 6th December 2019, the bunker bay was demolished on 17th July 2020, and the tank bay was demolished on 22nd January 2021. Demolition of the Chimney is anticipated in the coming months. Along the southern boundary of the site there are retaining walls which are approximately 5m high. There are three walls in total which are adjacent to the boiler house, oil tank bunds and the road around the ash plant.

3. APPLICATION DETAILS

3.1 This cross boundary application seeks planning permission for an outline application for the development of:

- (up to) 1,000 dwellings (950 open market and 50 affordable (5%);
- retirement village (of circa 70 units);
- employment land comprising of circa 6ha (approx. 16000sqm of commercial space) comprising classes B1(A), B1(C), B2 andB8;
- A Local centre comprises of 2,200sqm of retail and other uses including farmers market, comprising classes A1, A2, A3, A4, A5, D1 and D2; and a 400sqm convenience foodstore,
- Allotments of circa 0.4 hectares,

- Sports pavilion, formal and informal recreational land including sports pitches, open space and a central village green
- a railway link,
- primary/nursery school,
- Combined NEAP/LEAP;
- A railway link (with rail to trail option should funding not be achieved for a passenger light rail)
- Serviced plot for park and ride/ shuttle facility;
- Serviced plot for on-site healthcare provision (at discretion of CCG);
- walking and cycling routes, and
- associated landscaping, drainage and infrastructure works

3.2 All matters are reserved for later approval, except for access, in respect of two new vehicular accesses into the site from the A4169 Much Wenlock Road. Following completion of the first phase (250 dwellings) the existing vehicular access point off Buildwas Road will be closed to vehicular traffic and retained as a pedestrian and cycle link and as a public transport corridor.

3.3 An Illustrative Masterplan has been submitted as part of the planning application. This identifies the overall development strategy across the whole site, including the key elements such as housing, local centre and community facilities and employment land. A substantial area of green infrastructure has been included within the scheme, including sports pitches and pavilion, parkland, informal open space, woodland and ecological mitigation areas. SuDS techniques are to be incorporated into the scheme and will be set out within the detailed drainage strategy for each reserved matters application.

3.4 A Sustainable Design Brief is submitted that will be used to inform and guide the delivery of sustainable development through subsequent reserved matters applications. The document sets out a series of sustainability goals for the development and a condition is imposed which requires all subsequent reserved matters applications to provide a Design Code which, inclusive of other elements, seeks to establish how each phase will meet those aims. Harworth have made a commitment to establishing a “Sustainable Working Panel” which would be made up of representatives from Harworth Group and the Council (and the new community when established), to review and consider the measures proposed. This could form part of the proposed Stakeholder Group, which is required by the Construction & Habitat Environment Management Plan (C&HEMP) condition imposed.

3.5 The Sustainable Design Brief gives a commitment from the applicants to provide a healthy community incorporating the following:

- Increase and improved cycle links

- retain existing trees and tree belts
- additional footpaths and nature trails
- new employment opportunities within walking distances of residences
- use of SuDS throughout the site
- growing local produce in the allotments and offering a local farmers market
- park and green spaces
- electric charging points across the site
- reinstatement of sports pitches
- riverside area include hospitality facilities
- retention of heritage assets

3.6 Additionally, in order to minimise the use of energy, the site will consider the following:

- 18kVa of electricity will be provided ;
- electricity supplier chosen based on its green credentials
- No gas services will be provided on-site
- Domestic solar energy will be encouraged
- On-site energy creation will be explored
- Explore solar energy for on-site lighting, charging points etc
- Battery storage located on-site for excess power
- Air/water sourced heating/cooling would be explored
- A study into the feasibility of a small CHP plant using biomass from onsite/local resources and estate management could be explore

3.7 Buildings will meet ‘better than’ building regulations on all building typologies by considering the following:

- Modern methods of off-site construction to minimise on-site activities;
- modular building using modern methods of construction to maximise efficiency (possible on-site factory)
- use of sustainable carbon capture materials and minimise use of concrete and steel
- low energy site lighting
- reuse existing roads if possible and reuse demolition materials as part of foundations
- use of smart technology and metering to reduce water/energy usage
- on-site water storage and reuse of grey water
- homes for life
- promote and enable home working in light of recent lifestyle changes, reducing commuting

- Zero carbon use, by delivering buildings which are nett energy neutral or positive during occupation - for example by using high insulation standards plus solar power

3.8 The overall net density for housing achieved is approximately 25-30 dwellings per hectare over the designated housing zones.

3.9 Whilst the majority of the former Power Station buildings will be demolished, within the north of the application site lies a 1930's pumphouse and the Station A bridge, which will both be retained. Both structures are related to the first phase of the power station which operated from the 1930's until the 1960's, when the plant was upgraded. These structures represent the only extant buildings from this phase of the power station's operation. In addition, the existing National Grid building will be retained as part of the redevelopment proposals, together with the Western Power Distribution switching station. These buildings are strategically important electricity infrastructure that will remain in operation and are therefore located outside of the red line planning application boundary.

3.10 A Development Viability Review by Tustain Associates Limited (September 2020) was submitted by the applicant. This was independently reviewed by Turleys jointly on behalf of Telford & Wrekin Council and Shropshire Council and found to be acceptable.

3.11 The Viability Assessment concludes that given the extensive former industrial uses and the legacy of these operations, the site is subject to significant viability challenges. Specifically, the high infrastructure and abnormal costs amount to £62.84 million. As a result, the development is only viable with the provision of 5% affordable housing and £16.75 million toward Section 106 and CIL contributions.

3.12 Following amendments to the Use Classes Order which came into effect on the 1st September 2020, the Council requested a technical note from the applicants to clarify the impact this would have on the proposed description of development. As the application was submitted prior to the 1st September 2020, a formal amendment to the description of development was not required. However, for comparison purposes the changes are set out below.

3.13 Current description:

Outline planning application for the development of up to 1,000 dwellings, a retirement village, employment land comprising up to 1,600sqm of Class B1(a) offices, 6,800sqm of Class B1(c) light industry, 6,800sqm Class B2 general industry, 800sqm of Class B8 storage and distribution, a local centre

to include up to 2,200sqm non-food retail and other facilities (Class A1, A2, A3, A4, A5, D1 and D2) to include a 400sqm Class A1 convenience foodstore, allotments, sports pitches, a railway link, leisure uses, a new primary school (to include nursery provision) and a park and ride facility, together with new walking and cycling routes, and associated landscaping, drainage and infrastructure works. All matters are reserved for future approval, except for access, in respect of two new vehicular accesses into the site from the A4169 Much Wenlock Road.

3.14 Effect on description due to amendment to the Use Classes Order (2020):

Outline planning application for the development of up to 1,000 dwellings, a retirement village, employment land comprising up to 1,600sqm of Class E(g)(i) and E(g)(ii) offices, 6,800sqm of Class E(g)(iii) light industry, 6,800sqm Class B2 general industry, 800sqm of Class B8 storage and distribution, a local centre to include up to 2,200sqm non-food retail and other facilities (Class E(a), E(b), E(c), E(d), E(e), E(f)) to include a 400sqm Class E(a) convenience foodstore, public house (sui generis), hot food takeaway (sui generis); allotments, sports pitches, a railway link, leisure uses, a new primary school (to include nursery provision) and a park and ride facility, together with new walking and cycling routes, and associated landscaping, drainage and infrastructure works. All matters are reserved for future approval, except for access, in respect of two new vehicular accesses into the site from the A4169 Much Wenlock Road.

3.15 Summary of changes:

- B1(a) amended to E(g)
- B2 and B8, not amended.
- A1/A2/A3 amended to E(a, b, c)
- D1 amended to E(e) and E(g)
- D2 amended to E(d)
- A1 convenience foodstore amended to E(a)
- A4 amended to sui generis
- A5 amended to sui generis

3.16 The application was also accompanied by the support documents listed in **Appendix 1.**

4 RELEVANT PLANNING HISTORY AND CURRENT APPLICATIONS

4.1 No relevant applications have been submitted to Telford & Wrekin Council for this site as the majority of the site falls outside of Telford & Wrekin Council administrative boundaries.

4.2 The following applications have been submitted to Shropshire Council and are relevant to this proposal:

19/05509/MAW - Phased extraction and processing of sand and gravel including the erection of processing plant and ancillary infrastructure, temporary storage of minerals, utilisation of existing rail siding and creation of new access road on to Much Wenlock Road; restoration of the site
Proposed Quarry To The East Of Much Wenlock Road Buildwas Telford Shropshire – **Pending Consideration**

16/02868/SCR - Request for a Screening Opinion under Regulation 5 (2) of The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (As Amended) for the demolition of the Ironbridge Power Station Buildwas Road Ironbridge Telford Shropshire TF8 7BL – **EIA not required - 26 July 2017**

17/02314/DEM - Application for prior notification under Schedule 2 Part 11 of the Town & Country Planning (General Permitted Development) Order 2015 for the demolition of ironbridge power station conveyors 6 and 7 and associated structures – **Prior Approval Not Required - 24 June 2017**

17/04439/DEM - Application for Prior Notification under Schedule 2 Part 11B of The Town and Country (General Permitted Development) (England) Order 2015 for the demolition of: Zone 1 - four, natural draft, hyperbolic cooling towers and the cooling water supply channels and pipework; Zone 2 - the turbine hall and boiler house, electrostatic precipitators, chimney and admin block including adjacent workshops and stores; Zone 3 - the auxiliary boiler and associated tanks, and the area of land previously used for contractor welfare during outages; Zone 4 - two heavy fuel oil (HFO) tanks and the water treatment plant, the main site gatehouse, sewage treatment plant, storage buildings; Zone 5 - biomass store, coal stock conveyors, coal plant stores and workshop, the sports pavilion and bungalow - **Prior Approval is Required – 6 November 2017**

18/03597/FUL - Construction of 20no wildlife ponds – **Grant Permission - 2 November 2018**

19/01779/SCO - EIA Scoping Opinion for construction of around 1,000 residential dwellings, 20ha of commercial floorspace and associated infrastructure, to include a village centre (to potentially include a primary school, health provision and local commercial development) Park and Ride Scheme and leisure facilities – **EIA Required** ***[date of issue unknown – file no longer publically available on Shropshire Council website]***

19/02723/FUL | Erection of a bat house – **Granted Permission – 19 July 2019.**

19/03477/SCO | Environmental Impact Assessment Scoping Opinion request relating to proposed extension of Buildwas Quarry as part of redevelopment proposals on land at Ironbridge Power Station – **EIA required** - **4 October 2019**

20/04930/FUL | Erection of a peregrine falcon tower – **Grant Permission – 18 February 2021.**

20/05301/FUL | Phase 1 Earthworks - enabling works to commence upon grant of outline planning permission for the wider redevelopment proposals – **Grant Permission - 8 March 2021**

4.3 Demolition commenced on site in spring 2019 and is ongoing. Below is a brief outline of works that have taken place to date and those programmed for the future:

Undertaken to date:

- December 2019 – Demolition of the cooling towers
- July 2020 – Demolition of the bunker bay
- January & February 2021 – Demolition of the boiler house

Future planned demolition:

- Summer 2021 – Demolition of Chimney

4.4 Twenty wildlife ponds have been created as part of the Great Crested Newt mitigation area associated with the demolition of the Power Station and the applications detailed above.

4.5 Additionally, a bat house has been constructed on site and a peregrine falcon nest is due to be constructed in late Spring 2021, to mitigate against the loss of habitats during the demolition and remediation works.

5 RELEVANT POLICY DOCUMENTS

National Planning Policy:

5.1 National Planning Policy Framework (NPPF)

5.2 National Planning Practice Guidance (NPPG)

Local Planning Policy:

5.3 Telford and Wrekin Local Plan (2011-2031)

5.4 Shropshire Councils Development Plan comprising of:
- Core Strategy Development Plan Document (2011)
- Site Allocations and Management of Development (SAMDev) 2015
- Local Plan Review *(Regulation 19 pre-submission draft of the Shropshire Local Plan – Feb 2021 consultation)*

5.5 Ironbridge Gorge World Heritage Site (IGWHS) Management Plan (2017)

5.6 Severn Gorge Conservation Area Management Plan and Conservation Area Appraisal

5.7 Ironbridge Gorge WHS Statement of Outstanding Universal Value UNESCO Resource Manual 'Managing Cultural World Heritage', The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3 (2017).

6 NEIGHBOUR REPRESENTATIONS

6.1 The application has been publicised through site notice(s), press notice and direct neighbour notification. Three stages of consultation have taken place, following Regulation 25 requests issued to the applicant for further/additional information.

6.2 The Local Planning Authority received around 12 neighbour representation supporting the scheme, the following summary of comments were made in this respect:

- Extend rail link back to Ironbridge to boost tourism
- Local centre and foodstore appropriate in this location
- Supportive of mixed use development, not just housing
- Bridleway improvements are supported
- Opening of railway is positive
- Urban design, sustainability and ecological needs need to be considered in the long-term
- Use of brownfield site is supported
- Boost to Ironbridge economy
- Traffic management required
- Concern over hospitality units being competition to Ironbridge establishments – management needed to consider impacts

- Future proofing
- Support use of passenger train

6.3 The Local Planning Authority received around 85 neighbour representation objecting to the scheme, the following summary of comments were made in this respect:

- Principle of development is unacceptable
- Passenger railway line would cause unnecessary disruption
- Retention of national grid building is an eyesore
- Impact on Ironbridge Gorge and conservation status
- Impact on highways/traffic
- Loss of green belt land
- Local infrastructure unable to cope (i.e. hospital)
- Impact on natural environment
- Secondary school over-prescribed
- Noise impact during construction
- A4169 needs resurfacing
- Loss of house value due to proximity to rail line and possible reopening
- Impact on PRoW, lack of forethought to improvements to the network
- Impact on healthcare provision
- Flooding

6.4 Of these 85 representations, a number were from local Councillors, Parish Councils and numerous representations made by the same person(s) during the various phases of re-consultation. The views of the Parish Council(s) and Local Councillors are outlined below.

6.5 A further 18 (approximately) representations were received which did not stipulate whether they were objecting or supporting the scheme and were therefore recorded as 'comments'. The comments made in these representations are covered in the summary points raised above, both in support and objecting to the development.

7 STATUTORY REPRESENTATIONS

7.1 **Cllr Carolyn Healy (Ward Member of Ironbridge Gorge)** – Object:
Scale of development is too large and will double Ironbridge community size; proximity of development is too close to WHS; highway impact on Gorge and through rat running; visual impact on WHS/CA; pressure on local schools;

play provision insufficient and will impact on Ironbridge provision; consideration of walking/cycling improvements; welcome potential use of railway link; concerns regarding noise impact due to geography of site as a valley; demolition has caused disturbance to locals – concern going forward; full provision of affordable housing should be provided.

7.2 **Cllr Jayne Greenaway (Ward Member of Lightmoor and Horsehay)** – Object subject to conditions:
Primary school is welcomed and a necessity as no provision locally; concerned about provision for secondary school pupils; support inclusion of healthcare facility on-site; support use of railway during construction stages to minimise use of roads; better provision of public transport required to employment areas of Telford particularly during peak times; consideration of renewable energies. Support many elements of the scheme but without financial contributions towards highways, healthcare, schools, public transports, public rights of way, site will become isolated. Object subject to conditions to cover these points.

7.3 **Cllr David Turner (Ward Member of Much Wenlock)** – Object:
Concerns over use of A4169 – surfacing, queuing vehicles and geography; concern over highways impact in Much Wenlock and potential 'rat running', specifically at the Gaskell Arms; concerns over noise/air quality impact on Much Wenlock residents.

7.4 **Cllr Rae Evans (Ward Member of Woodside)** – Object:
Removal of sand/gravel will impact on surface water drainage and cause issues downstream; Could excess spoil be used to create flood defences in Jackfield?; has climate change crisis been considered; queries whether noise tests have been undertaken by a sound engineer; working hours restricted; avoid rat-running through Ironbridge; Use of railway to freight spoilt out of the site will impact on residents; concern over contaminants becoming airborne.

7.5 **Gorge Parish Council** – Object:
impact on both the probability, scale and frequency of flooding issues; noise, light and air pollution during construction/remediation phases; management of foul drainage; traffic issues are known at junction of A4169 causing long delays; main access (roundabout) should be built earlier; negative impact on WHS; concern over local infrastructure and increased pressures i.e. GPs; request long term commitment for passenger rail; number of suggested conditions are provided.

7.6 **Stirchley & Brookside Parish Council** – No objection.

7.7 **Little Wenlock Parish Council** – Object:
Recent flooding locally evidences flood risk of this site; growing evidence in the Parish that traffic is using country lanes to rat run through to M54 and this will be exacerbated.

7.8 **Much Wenlock Town Council** – Object:
Development cannot be seen to be aligned with Shropshire Local Plan in respect to climate change and the protection/enhancement of both the natural an historic environment; flooding; land slips; consequences of mineral extraction in proximity to natural and historic assets; contrary to Policy CS18; would like to seen an alternative use such as eco holiday site.

7.9 **Buildwas Parish Council** – Object:
Highway impacts; safety concerns over Buildwas Bank junction – do not support the urbanisation of the traffic signalisation proposed; increase in vehicular movements and impact on existing residents; concern over proposed public transport links; concerns over impact on ecology and existing deer population; support Sports England comments; concern over light pollution and how lighting strategy will monitor this; concerns over viability appraisal – requirement for full 20% affordable housing provision, concerns over reduced CIL/S106 contributions; objection to scale and impact on open countryside/heritage assets; do not support development of greenfield land; Parish already reached development prescribed by SAMDev; against closure of existing primary school; if closed, site should be retained as a community asset/hall; sustainable travel plan required; concerns over capacity of existing healthcare facilities; on-site treatment plant should be proposed; commercial proposals should not be of a loud nature; if approved the design of the buildings should be sympathetic to the area.

7.10 **Ironbridge Gorge World Heritage Site Steering Group** – Object:
WHS, AONB and SSSI adversely affected by the scale of development; not enough consideration given to OUV/WHS within Heritage Impact Assessment; FRA doesn't address the concerns of the community adequately; drainage remains a serious concerns as the development will place a significant strain on the capacity of the facilities at Coalbrookdale and Coalport as well as within the WHS; impact of Noise and light pollution; impact of local highway network within the Gorge; greater consideration to be given to light rail to assist in reducing car use; series of projects within the WHS Management plan that require funding to help mitigate the impacts the development would have on the WHS.

7.11 **Local Highways Authority** - Support Subject to conditions

7.12 **Local Flood Authority** – Support subject to conditions

7.13 **Built Heritage** – Support subject to conditions

7.14 **Archaeology** – no objection

7.15 **Arboricultural** - Support Subject to conditions

7.16 **Ecology** – Support Subject to conditions

7.17 **Environmental Health** – Support Subject to conditions

7.18 **Healthy Spaces** - Support Subject to conditions

7.19 **Local Education Authority** - Support Subject to conditions

7.20 **Geotechnical Engineering** - Support Subject to conditions

7.21 **Environment Agency** - Support Subject to conditions

7.22 **Historic England** - Support Subject to conditions

7.23 **Highways England** - Support Subject to conditions

7.24 **Sport England** - Support Subject to conditions

7.25 **Severn Trent Water** - Support Subject to conditions

7.26 **Network Rail** – support

7.27 **Clinical Commissioning Groups (CCG)** – Support subject to conditions/contributions

7.28 **National Grid** – No objection:
Development in proximity to overhead lines, guidance to be followed.

7.29 **Cadent Gas** – No objection.

7.30 **Shropshire Fire Service** – Comment:
As part of the planning process, consideration should be given to the information contained within Shropshire Fire and Rescue Service's "Fire Safety Guidance for Commercial and Domestic Planning Applications" document.

7.31 **West Mercia Police** – Comment:
Provided general design guidance.

8 APPRAISAL

8.1 Having regard to the development plan policy and other material considerations including comments received during the consultation process, the planning application raises the following main issues:

- Principle of development
- Masterplan principles
- Highways impacts
- Foul & Surface Water Drainage
- Ecological Matters
- Arboriculture
- Noise & Air Quality
- Ground Conditions
- Heritage
- Landscape
- Sport/Recreation
- Education
- Healthcare
- Railway
- Public Rights of Way
- Impact on the amenity of adjacent properties / uses
- Mineral Extraction
- S106 contributions/Memo of Understanding.

8.2 <u>Principle of development</u>

8.2.1 In the context of the Telford & Wrekin Local Plan, the site falls outside of the built up area. However, within Shropshire (whom are the lead authority on this application) the site forms part of Shropshire Council's Pre-Submission draft of the Local Plan (2021), and is identified as a Strategic Settlement (Policy

S20). The site, once remediated and developed, would provide Shropshire with a new strategic settlement which will contribute towards strategic growth aspirations in the east of their County.

8.2.2 The Shropshire Council pre-submission draft of the Local Plan has just gone through a final consultation period (Feb 2021), with Shropshire Council intending to submit to the Secretary of State (SoS) in late July 2021. Adoption of the Local Plan is envisaged in summer 2022.Whilst the new Shropshire plan is emerging and therefore has limited weight, there is general consensus over the principle for adoption of the Power Station site as a strategic allocation and we have been advised, that there have been no significant stakeholder challenges to the principle of allocation. Shropshire Council advise that comfort can be derived at this stage from the NPPF which supports redevelopment of brownfield sites and strategic housing provision.

8.2.3 The outline planning application has allowed relevant sustainability issues associated with the proposals to be considered and addressed in detail prior to plan adoption, which are discussed below. It is considered that this supports the conclusion that the proposals are sustainable and accords with the current development plan when seen as a whole. The proposals are considered to be fully compliant with the draft policies of the emerging SAMDev plan which cover the same subjects as the adopted plan. Shropshire Council further advise that whilst the Harworth proposals are significant in a sub-regional context the outline application is not considered to be prejudicial to the outcome of their SAMDev review process. This is given the general lack of objection to the Harworth allocation through their Local Plan consultation process, and the other factors mentioned above, including the findings of detailed consultations on the application and the availability of appropriate mitigation and control mechanisms.

8.2.4 The site is predominantly brownfield land and in accordance with Chapter 11 of the NPPF (specially paragraph 117 and 118(b)), substantial weight should be afforded to the value of using suitable brownfield land for homes and other identified needs, and should furthermore support opportunities to remediate derelict and contaminated land. This is a material consideration which makes the application fully compliant with the aims of the adopted NPPF.

8.2.5 It is therefore considered that the development is acceptable in principle, in relation to the NPPF and Shropshire Council Local Development Plan, and its emerging review.

8.3 <u>Masterplan principles</u>

8.3.1 A comprehensive masterplan has been prepared and submitted with this application for a mixed use development as is required by Policy S20. A copy of the policy and its associated inset map are appendix to this report at **Appendix 2.** A summary of the key guidelines which the masterplan and site must follow, are set out below:

a) housing - informed by site constraints and opportunities, identified local needs and relevant policies;
b) employment - quantity and quality to contribute towards the objectives of the Shropshire Economic Growth Strategy;
c) village centre - range of commercial uses to serve the new settlements community. Its timely provision is an important consideration;
d) green infrastructure - protect and enhance key green infrastructure corridors and networks on and around the site and existing areas of public open space;
e) community facilities and buildings (i.e.) -
    - community hall, art gallery and heritage centre
    - 2ha of land will be provided for a primary school
    - If required by the relevant CCGs, a medical centre will also be provided on the site
    - These facilities and buildings will tap-into the heritage of the site;
f) pedestrian, cycle and vehicular access/egress points provided and where necessary, existing routes upgraded;
g) local and strategic road network - improvement will be undertaken where found to be necessary;
h) pedestrian and cycle links will be provided to and through the site, particularly to the proposed nursery, primary school and village centre.
i) Site design and layout – of high-quality, reflecting and respecting the sites proximity to the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and minimising landscape and visual impact. This is particularly important to the development of the greenfield elements of the site;
j) heritage - reflect and respect heritage of the site and its relationship with heritage assets within the wider area, including the Outstanding Universal Value of the WHS;
k) retain/enhance/repair/adaptive re-use - Grade II listed Albert Edward railway bridge and the former pump house on the northern boundary adjacent the River Severn;
l) Natural environment - assets on and in proximity of the site will be retained and appropriately buffered.
m) acoustic - appropriately manage noise associated with retained National Grid and Western Power Distribution substations and equipment and nearby roads.

n) trees - A sustainable juxtaposition will be created between built form and trees. Where possible trees and woodland should be incorporated into areas of open space and planting should occur to connect to / expand adjoining wooded areas;
o) protected species – appropriate assessment and provision on site for identified protected species and wildlife generally;
p) any contaminated land on the site will be appropriately managed.;
q) mineral extraction opportunities associated with the site will be investigated and where appropriate extraction works undertaken;
r) drainage - informed by a sustainable drainage strategy. Development will also be excluded from the small portions of the site located in Flood Zones 2 and/or 3. Flood and water management measures must not displace water elsewhere.

8.3.2 During the course of the application, a number of revisions were made to the originally submitted Masterplan, as outlined below:

- Retention of strategic planting around the existing (retained) commercial buildings providing a mature natural screening of the units from both within the wider and in the wider context;
- Agreement to a minimum 15m buffer around the southern ancient woodland;
- Reduction of built form in the 'Woodland Character Zone' to minimise loss of woodland and ecological habitats;
- Rearrangement of the Local Centre to appropriately integrate facilities within the community and in association with the surrounding open space;
- Reduction of built form in the north to create a green corridor to the sports pavilion, open space and pumphouse beyond – creating a central green space for the community at the heart of the development.

8.3.3 Following receipt of revised and additional information during the life of the application, both Local Planning Authorities are now satisfied that the indicative masterplan in conjunction with other supporting documentation, seeks to meet the guidelines set out by emerging Shropshire Policy S20 which seeks to allocate the site as a strategic settlement.

8.3.4 Despite the vast majority of the site falling within the administrative boundaries of Shropshire Council, consideration must be given to Telford & Wrekin adopted policies and in particular, in recognition of the likely impacts arising from the development.

8.3.5 The site falls outside of the built area of the Telford & Wrekin Local Plan Inset map and therefore falls within the rural area. Policy SP3 states that development would be directed to the reuse of previously developed land and to settlements of good infrastructure. It is considered that this location is well connected to existing infrastructure and seeks to provide an optimum viable use for a highly constrained brownfield site, as is set out within the NPPF.

8.3.6 In respect to the masterplan principles set out above, we have considered all elements of the proposal against local plan policies. Specifically relating to the impact of the development and seeking mitigation in the form of off-site works and financial contributions, so not to cause an adverse impact on the surrounding area. These are discussed in the relevant sections below.

8.3.7 On the basis of the above, both Local Planning Authorities are satisfied that the proposal put forward is a sustainable development which seeks to meet the aims and objectives of the emerging strategic policy.

8.4 Highway Matters and Sustainable Connections

Local Network:

8.4.1 During the course of the application, ongoing discussions have been held between the Local Highways Authorities at both Shropshire Council and Telford & Wrekin Council, Highways England, and the applicants' Infrastructure Consultants, ADC.

8.4.2 The use of a strategic model to assess the vehicular impact of the site was promoted by Telford officers very early on in the process. This approach was accepted as the correct basis for assessment by both Councils, Highways England, Harworths and their consultants. The key advantage of using a strategic model approach is that a holistic appraisal can be made of how vehicles actually move around the wider network, when accounting for all other committed and planned development, rather than making broad assumptions and standalone assessments. The model also enables us to analyse how the highway network will operate up to the year 2036.The newer strategic model is now, in 2021, fully operational, so a benchmarking exercise between the older model, used for the planning application, and the newer model has taken place for peace of mind. The only notable variance was the newer model predicted a little less traffic overall on the network at 2036, but this is to be expected because of the delivery uncertainty factor accounted for in that model.

8.4.3 The highways assessment work undertaken is based on a 'worst case' car heavy use scenario. There have been no specific deductions made in the traffic predictions for matters such as rail use in the future or working from

home assumptions. Therefore the traffic generation figures are considered to be robust, and are not reliant on the delivery of the railway facilities.

8.4.4 The highway area principally studied, in the Telford and Wrekin Borough, is that generally within 5.5km of the site and includes the A4169, A5223, B4373 and the Ironbridge and Coalbrookdale corridors.

8.4.5 The full technical submission and numerous technical notes have been audited by the Local Highway Authorities and they are satisfied that the information provide meets the standards expected to make an informed appraisal of the likely highway impact associated with the proposals.

8.4.6 The following conclusions have been drawn from the analysis of the highways information submitted:

i) Circa 80% of the traffic generated by the development will access the Telford network at peaks hours (8am-9am and 17pm-18pm). When the development is complete this likely to be 700 new two way vehicular trips on our network at these peak times;

ii) Without deterrent mitigation around 80 of these new trips are expected to route through Coalbrookdale and Ironbridge; the other 620 will enter the Telford network via A4169 Buildwas Bank, where the split at Jiggers Bank Roundabout is broadly 50/50 A5223 (north/south) and A4169 (east/west);

iii) In terms of the access strategy to the site there are two main phases:

a) the first being an initial pocket of development of circa 250 dwellings served off Buildwas Road, via what is the existing main power station access over the river, and;
b) the second being the closure of this access to vehicles and the site then being served by two principal accesses off the Much Wenlock Road (A4169), both within Shropshire;

iv) The first development parcel served via Buildwas Road is predicted to generate up to 150 two way vehicle trips at peak hours or just over two new trips a minute in that period. It is expected that 120 of these will head to and from Telford. Just 15 of these trips are expected to route through The Gorge but under a sensitivity scenario this could be higher due to rerouted trips to access local facilities, such as the Co-op at Dale End;

v) As a result of the primary access infrastructure becoming operational on the Much Wenlock Road, the model indicates a shift in extant traffic patterns, where traffic which currently uses The Gorge to access Much Wenlock reroutes via Broseley and the B4373, B4375 and B4376 instead;

vi) Notwithstanding point v) the matter of development traffic through The Gorge has always been at the forefront of the highways discussion and Harworths have committed to traffic management measures in The Gorge, as part of their offsite obligations. There are a number of options available but any specific scheme for delivery will be as of the result of a stakeholder engagement exercise to ensure any measures are not only fit for purpose but also sensitive to the local area. This will be secured through the S106;

vii) The A4169/B4380 Buildwas Bank junction is identified as requiring improvement early on in the site delivery to ensure right turning traffic towards Telford is not delayed and rerouting through The Gorge may occur. The intervention trigger has been agreed to be prior to the occupation of the 180th dwelling on the site. The junction improvement will take the form of a new roundabout and will be delivered by the applicant. As part of the roundabout proposals a right turn ban with associated 'pork chop' type traffic splitter should be introduced at the Much Wenlock Road/Buildwas Road junction. This ensures that any right turner here must U-turn at the new roundabout, this again reinforcing route choice up Buildwas Bank;

viii) Detailed assessments of link and junction capacity in 2036 has identified the only other key offsite highways infrastructure obligation to be the improvement of the A4169/B4373/Majestic Way Castlefields Roundabout. This junction already experiences queues and delays at peak periods and Harworths have agreed to a full scheme of works to mitigate both the extant issues and the future impact of not just the power station site but also all other committed developments. The proposed mitigation could involve part signalisation of the roundabout to balance priority and part time signal operation will be investigated for off peak periods. This will be secured by condition/S106;

ix) The primary sustainable connection between the development site and Ironbridge is the Severn Valley Way which runs from the point of the old cooling towers, along the bottom of the river and through to the southern base of The Ironbridge. This is already a well-used and maintained Public Right of Way but it has been agreed with Harworths

that they are to provide a substantial upgrade to this route to facilitate its increased use and promote sustainable travel choices to and from the site. This will be secured by S106;

x) Buildwas Road also provides sustainable connectivity from the site through to Coalbrookdale within the Telford Borough. It is acknowledged that the footway narrows in places but forward visibility of oncoming pedestrians in these places is generally good and improvements to the footways and pedestrian safety enhancements can be included in the future traffic management proposals if required;

xi) The railway will be utilised for transporting material off the site and the requisite structural improvements to the route are being secured with Network Rail. However, there is still no robust long term strategy presented for the use of the line, whether it be rail based or another form of sustainable corridor and this will need to be finalised as part of subsequent REM phases; this is also recognised as an important opportunity to explore within the WHS MP, providing a sustainable connection from the WHS to Telford Town Centre.

xii) Harworths, following negotiations with Arriva, are proposing to fund a bus service between the site and Telford. As the site is in Shropshire and it will be Shropshire residents accessing the facility the responsibility of securing the requisite contribution framework has been left with Shropshire Council. Any future proposals for park and ride or linked services into the The Gorge will of course involve Telford Officer engagement prior to the agreement of any strategy.

8.4.7 The cumulative effect of all the highway improvements outlined above which the development will secure, specifically the closure of the Buildwas Road access after the first phase (250 dwellings), the traffic calming measures along Buildwas Road leading to Ironbridge, the roundabout (including right turn ban) and Castlefields Way Roundabout improvements, gives some initial indication of there being little merit in development traffic rat running through The Gorge. Clearly southern parts of Woodside, Sutton Hill and Coalport would still attract some traffic but quantum's would be fairly low and would likely be unperceivable from regular traffic.

8.4.8 There will inevitably be a level of pass by diverted trips by drivers who wish to access the facilities in Ironbridge on their way to and from work for example, but these types of trips would not generate traffic levels that would be particularly adverse and additionally, this must be weighed against the support this provides to the local economy.

8.4.9 The Local Highways Authority are satisfied that with the contributions and off-site works being sought, along with the conditions outlined below, they have no objection to the application.

Strategic Road Network

8.4.10 Significant consideration has been given to the impact of the application on the Strategic Road Network (SRN), by Highways England, which has required the provision of additional information during the course of the application and its subsequent detailed analysis. This includes the detailed information relating to. The calculations utilised for the trip data and further information relating to capacity analysis looking at the proposed development and other committed development in the locality which may impact on capacity. Subsequently a formal revision to the application was made in August 2020 which included the following relevant documents:

- Updated Environmental Statement (Chapter 10 Traffic and Transport);
- Transport Assessment Addendum (dated: 13 August 2020 as v2); and
- Associated Appendices (App A-Y) (dated: 13 August 2020 as v2);

8.4.11 In September 2020 Highways England advised that the method utilised in the modelling to calculate the distribution of proposed development traffic from the Ironbridge development was now agreed, and confirmed that the impact on Junction 4 and 5 of the M54 was considered to be relatively low; however junction 6 was shown to have a greater impact than envisaged. As such, a detailed junction capacity assessment was required.

8.4.12 Further information was therefore submitted which included:

- ADC Infrastructure Technical Note – Response to Highway Authority Comments, dated 18 January 2021 and Appendices
- ADC Infrastructure letter response to Highways England comments, dated 19 January 2021

8.4.13 Subsequently Highways England raised concerns over the modelled Heavy Goods Vehicle (HGV) and Passenger Conversion Units (PCU) conversion factors and the modelled give-way parameters utilised for the priority controlled local road approaches. However, Highways England considered that these discrepancies would not have a significant impact on the overall

conclusions, which is that the proposed development having been technically assessed would not have a significant impact on the SRN either in the opening year and subsequent review year, 15 years later. The results of the survey work and modelled scenarios show that both of the M54 off-slips would operate below 90% saturated in all modelled scenarios and there would be no significant increases in queueing or delay due to traffic from the proposed development.

8.4.14 Highways England issued a final consultation response which removed their holding objection in place of a 'support subject to conditions'. The condition relates to the requirement for a phased construction management plan which is included in the recommendation below to ensure that the M54 motorway continues to serve its purpose and is not duly affected by the routing of construction traffic.

8.4.15 It is recognised that issues have been raised by both the general public and other interested parties in respect to the highways impact, both within the Gorge and in the wider context. Officers consider that this element of the scheme has been given significant consideration and appropriate mitigation measures sought to manage the impacts on the local highways network, including measures to discourage at-running through the Gorge as set out above.

8.4.16 Officers consider that the proposal is acceptable subject to mitigation measures controlled through conditions and the S106 agreement, and it is therefore compliant with the NPPF and local plan policies C2 and C3 in this respect.

8.5 Foul & Surface Water Drainage

Foul Drainage

8.5.1 The applicants have a right to connect to connect to the existing foul drainage system that exist in the vicinity of the site, and have therefore submitted a right to connect to Severn Trent Water (STW) under a section 106 of the Water Industry Act 1991.

8.5.2 The proposal have been assessed and will necessitate the need for significant capacity upgrades, potentially, also including surface water removal. The design will be complex and is likely to take an extended period of time to build. It is also acknowledged that construction will also be complicated given the environmental sensitivities which apply in this nationally designated area. STWs initial hydraulic analysis indicates that connecting even part of the proposed site without appropriate mitigation could lead to a significant

increase in the risk of sewer flooding in the catchment that drains down to the treatment works at Coalport. As such, a phased approach to the development is necessary and it is important that the works are appropriately mitigated through conditions/

8.5.3 A 'Foul Drainage Requisition Technical Note' has been produced by the applicants to outline the necessary requirements, which STW have considered. This advises the following key points:

a. The applicants have a right to connect to the existing sewer network;
b. The closest adopted foul sewer is in Buildwas Road and is a 150mm combined sewer (increasing to 600mm before it reaches the nearest pumping station);
c. The existing Buildwas Road sewer discharges to the Dale end Pumping Station adjacent the co-op;
d. A new pumping station will be erected within the application site and two new foul water rising mains will be laid across the bridge and up Buildwas Road. One main will be 90mm and another 225mm;
e. The 90mm main will be utilised for the first 100 dwellings, when foul flows will be minimal;
f. At the point when a sufficient level of development has been constructed and occupied to generate foul flows to achieve self-cleansing velocity of the 225mm diameter rising main, the pumped foul flows will be switched to the larger main and the smaller 90mm main abandoned;
g. The new rising mains will connect to the existing pumping station at Dale End;
h. The discharge of foul flows from the development site will be via a new on-site pumping station, therefore the flow rate to the existing sewers can be controlled to a rate determined by Severn Trent, as well as to meet the constraints present on the existing sewer network;
i. For the initial phase of development, a pumped discharge rate in the order of 1.0 – 1.5 l/ s will be used. It will be possible to vary the pumped discharge rate for later development phases and in-line with any future sewer reinforcement works. Separate below ground storage will be provided at the pumping station to cater for periods when a lower flow rate is required.
j. Chemical dosing will be provided at the pumping station for periods when the storage is utilised or low flow rates in the rising main occur. The chemical dosing will mitigate any septicity of the foul effluent; the timings of the discharge from the development site can be set to off-peak periods during the day or night when existing flows are low, if required by Severn Trent. This will minimise the impact on the existing sewer network;

k. The new foul drainage system and pumping station on the site will be offered for adoption by Severn Trent under a Section 104 agreement, so the pumping regime will be controlled by Severn Trent to suit its network, once it becomes operational;

8.5.4 The LLFA have advised that should a connection to the existing network be considered acceptable by Severn Trent Water, they would wish for any improvements to incorporate off-peak pumping and cut-off during storm events to minimise impacts downstream. This would be required by condition with the first reserved matters application.

Flood Risk and Surface Water

8.5.5 The application recognises the history of flooding experienced downstream in Ironbridge with the ES advising that the Flood Risk Assessment (FRA) should both demonstrate that the development should not increase the risk of flooding, but also consider, where viable, betterment for the downstream community including the use of SuDS.

8.5.6 The site is shown to be located within Flood Zones 1, 2 and 3 (the low, medium and high risk zones respectively). Whilst the majority of the site is within Flood Zone 1 some land on the northern border of the site lies within Flood Zone 3, this land being adjacent to the River Severn. Using a sequential approach this northern portion has broadly been utilised as public open space/recreation although it would appear that some development is still shown to be within Flood Zone 3 and this is not acceptable; any reserved matters application will therefore be required to address this principal, restricting development in this location.

8.5.7 If there are specific reasons why this cannot be achieved then the FRA concurrent to any reserved matters application would need to make this clear. In this situation the applicant may consider landscaping with a view to providing flood storage compensation elsewhere within the parameters of the site. The calculations for any compensation must be like for like, level for level and those calculations should be provided as part of any Flood Risk Mitigation Strategy at the Reserved Matters stage. Should compensation be required it will be necessary for the applicant to provide a significant degree of flood risk betterment to suitably balance the benefits of this approach, and outweighing any harm.

8.5.8 The Environment Agency would expect confirmation that Finished Floor Levels (FFLs) for all these properties will be set no lower than 600mm above the 1 in 100 year flooding event, with consideration to climate change.

8.5.9 Appropriate conditions are imposed by both the LLFA and Environment Agency to provide all the details required as part of any reserved matters applications, including any betterment proposals as part of the drainage strategy.

8.4.17 It is recognised that issues have been raised by both the general public and other interested parties in respect to flooding, and specifically the impact on the Gorge in light of recent flooding events, which we as Officers recognise.

8.4.18 Officers have held numerous meeting with Severn Trent Water raising the concerns and these have been acknowledged. STW have commissioned in-house feasibility studies (which are still ongoing) to ensure that there is both sufficient capacity in the sewer network and also that measures are incorporated into the design to allow a controlled rate to enter the system during off-peak times when existing rates are low.

8.4.19 Additionally, the Environment Agency are satisfied that ensuring development is located within Flood Zone 1 and betterment opportunities are explored, there will be no increase on the risk of flooding downstream.

8.4.20 Officers consider that the proposal is acceptable subject to mitigation measures controlled through conditions which require the improvements works set out by STW to be undertaken prior to occupation, and detailed design and flooding strategies provided for each subsequent phase. It is therefore considered compliant with the NPPF and local plan policies ER10, ER11 and ER12 in this respect.

8.5 Ecological Matters

Habitats

8.5.1 There are woodlands both designated and non-designated within the site boundary along with hedgerows and a veteran tree which is considered to be an irreplaceable habitat and is proposed for retention. The Hedgerows are considered to be habitats of principal importance for nature conservation under the NERC Act. A 40% loss of hedgerows will occur in the minerals working phase (under the separate application) and a further 65m loss would occur as part of the residential development. The mitigation required to set against this loss is set out in the ecological mitigation set out below and will come forward as part of the landscaping schemes for subsequent reserved matters applications.

Designated Sites

8.5.2 There are a number of designated sites both within and immediately adjacent to the proposed development site. The geological SSSI on site is outside of the working area of the site and will be retained.

8.5.3 Tick Wood and Benthall Edge SSSI is immediately adjacent to the site boundary and partially inside the boundary. This site is considered to be an irreplaceable habitat of national importance. The proposal recognises this and includes the protection of this area with appropriate buffering to reduce the proposals impacts. This is set out in the General Response Technical Note and accompanying plans Figures 7.23a-e. A buffer of open space will be fenced off to physically protect the woodland edge which would generally be 50m in width, however there would be two pinch points where this would reduce to 40m. These areas are where existing buildings/structures and hardstanding already exist and where those areas will be demolished and ground prepared for green infrastructure provision. We are satisfied with this approach and would like to see the figures which demonstrate it referenced in the planning conditions for the scheme.

8.5.3 The Recreation and Urbanisation Strategy (RUMS) (2020) which sets out the provision of three circular walking routes on the development site which are intended to reduce the increase in recreational pressure on the ancient woodland and SSSI at Tick Wood. Looking at the plans associated with the RUMS it is clear that though these routes are of reasonable length (2 – 4km) they largely involve walking in the built environment, or in close proximity to it, and it is argued that residents may be more likely to utilise existing walking routes available in Tick Wood SSSI.

8.5.4 On this basis, the Severn Gorge Countryside Trust (SGCT) are seeking monetary contributions towards improvements in infrastructure within the SSSI which will be required to mitigating against and support the increased visitor numbers and these are to be incorporated into the Memo of Understanding set out below.

8.5.5 Further contributions were also requested from SGCT to assist with ash dieback and the management/ maintenance and replanting associated with this issues however, it is considered that this request does not meet the relevant planning tests that are required to mitigate against the impact of this development, and therefore have not been sought.

8.5.6 An additional SSSI at Lydebrook Dingle has been scoped out of the assessment and two Local Nature Reserves on the opposite side of the river have also been scoped out.

8.5.7 There are seven local wildlife sites in close proximity. The River Severn (Cressage Bridge to Coalport Bridge) section is adjacent to the northern boundary of the site and partially within the red line and has potential to be impacted by the development both in terms of impacts of construction close to the river, lighting, dust and water pollution and long term operational impacts around permanent lighting, increased disturbance and recreational use. There is information on these concerns within the updated environmental chapter and the Provisional Construction Environmental Management Plan (CEMP) which can be developed as each phase comes forward. Figures 7.18a and b establish zones where lighting will need to be controlled on the site and we are supportive of the principles of those figures.

Bats

8.5.8 Bat roosts were found in several of the buildings on the site prior to any demolition and clearance works. Subsequently a bat mitigation licence from Natural England has been requested by the applicant to undertake and mitigate against the operational demolition, clearance and development of the site. Although work is ongoing to remove the roosts, mitigation has been provided in the form of a bat house on the site, within the existing amphibian mitigation area discussed below, and the licence covers all of roosts which were present in buildings on the site prior to demolition. It is understood from the applicants that the barn is currently being actively used.

8.5.9 The Pump House building is proposed for retention and reuse and is a known bat roost; this roost is covered by the licence which is in place for the site and will need further consideration as and when a future use for this building is explored in the later reserved matters stage.

8.5.10 There are three bridges to the site which have been assessed for potential to support roosting bats: The old A station bridge is low potential, the main bridge is moderate potential (N.B. neither will be impacted). The Albert Edward rail bridge has been assessed in 2020 as having bat roosting potential including potential to support hibernation roosting. Three activity surveys in 2020 revealed 3 pipistrelle roosts in the structure. Hibernation surveys have not yet been undertaken and provided but are scheduled for January and February 2021.Any works on the listed Albert Edward Rail Bridge will need to occur under a European Protected Species Mitigation Licence from Natural England supported by a full set of bat surveys, including covering the hibernation period, and an appropriate mitigation strategy. The applicants have provided some further justification that the hibernation elements can be appropriately controlled by the Natural England licencing regime and that, therefore there is no risk of an offence occurring. FPCR also confirm that the site has potentially to support any additional mitigation required by Natural

England. It is considered that the impacts upon bats can be appropriately controlled and that, under Natural England's new Licencing Policy 4, seeking the additional surveys prior to planning by delaying the planning process would not be proportionate to the additional information that those surveys would be likely to provide. Appropriate conditions are set out below as well as a European Protected Species 3 tests matrix.

8.5.11 Trees on the site have been assessed for bat roosting potential: two high potential, 15 moderate potential and 7 low potential trees have been identified. The Environmental Chapter confirms that all these trees are proposed for retention within areas of green infrastructure on the site, the Provisional CEMP sets out requirements for surveys, licencing and ecological supervision for any works on these trees and those measures are sufficient.

8.5.12 Bat activity transect surveys have been carried out across the site and have identified moderate levels of activity from a range of bat species. The biodiversity chapter talks of strong green infrastructure links across the site allow continued foraging after development.

8.5.13 Following the regulation 25 request, changes were to the north to south green infrastructure connection on the newly revised masterplan. Whilst the landscape planting here has been reduced (in comparison to the last version) in order to facilitate the ongoing provision of sports facilities in this area of the site, we are satisfied that the connectivity being provided is sufficient to support the movement of wildlife through the site and to the river and provides a balance between both the requirements for recreation and biodiversity needs.

Great Crested Newts (GCN), Amphibians and Reptiles

8.5.14 Reptiles and amphibians have been excluded from the site under a GCN European Protected Species (EPS) Licence from Natural England and a mitigation area has been provided to the south of the former power station within the red line of this application. There are 20 ponds with terrestrial habitat which are currently surrounded by deer fencing and semi-permanent amphibian fencing.

8.5.15 The long term approach to managing this mitigation area, both in terms of the habitats created and controlling recreational pressure and impacts of dogs are not set out in the application and need to be fully understood in order to allow the impact of the development to be accurately assessed. It is assumed that at the end of the development phase the amphibian fencing would be removed but the long term management of this area remains unclear.

8.5.16 The biodiversity chapter of the ES considers wider areas of reptile and amphibian habitat on the site following development but those areas are not clear on the site layout plan and no additional information has been provided despite having been sought. Additional information on these elements will be required as part of each reserved matters application The site design outside of the mitigation area will need to include a range of wildlife ponds, independent of the suds features being provided, hibernacula and areas of tussocky grassland and other terrestrial habitats. This will be the subject of a detailed condition.

8.5.17 The recommendation is that the site should follow a great crested newt mitigation strategy including dropped kerbs, offset gully pots, GCN tunnels etc and further information has been sought on the measures proposed and their locations within the site. FPCR have provided a Wildlife Connectivity Parameters Plan (Figure 7.26) which identifies areas of the site where ecological connectivity measures such as underpasses, sensitive lighting, wildlife friendly drainage and other measures will be required. A condition, relevant to each phase of the development, is required to secure this recommendation.

Dormouse

8.5.18 Although there are two anonymous and non-validated records in the local area it is considered unlikely that this species is actually present in the surrounding woodlands or on the site. It is therefore considered that the proposed development will not adversely affect the species subject to the approach set out in the supporting documentation. Consideration could be given at reserved matters stage as to how the development could incorporate new habitats for dormouse, which is an ongoing programme in Telford & Wrekin currently.

Breeding Birds including Peregrine Falcon and Little Ringed Plover

8.5.19 The breeding and wintering bird surveys on the site identified 60 bird species present on the site with 20 species breeding including 8 notable species.

8.5.20 Three pairs of little ringed plover were recorded breeding on the site which is equivalent to over 1% of the Shropshire population. Following receipt of revised documentation, it is noted than an area of habitat managed for the Little ringed plover has been identified on the Wildlife Connectivity Parameters Plan (figure 7.26), and this approach is supported. The site is of local value for assemblages of woodland and farmland birds and the proposed site layout appears to provide suitable opportunities for these species to continue to be

present. Provision of artificial nesting boxes on the proposed development will support these species remaining present.

8.5.21 Peregrine Falcon are breeding on the site. Mitigation for the loss of this breeding site is essential and has been considered and addressed as part of the demolition proposals and a separate application. This application continues to support this approach and will not further compromise this breeding site.

Otters

8.5.22 The submitted reports evidence otters using parts of the site along the River Severn as resting places, including the area around the Water Pump House building in 2018. Two potential Holts and six couches were identified in 2018. Couch 4 is close to the Water Pump House building and may potentially be disturbed by renovation works to that building. The other holt and couch locations are considered not to be at risk of disturbance or destruction from the works. The consultants have recommended an updated survey is provided in advance of works commencing around the Water Pump House and for the need for an otter licence to be kept under review – this is covered in the CEMP. The consultants also recommend that a Reasonable Avoidance Measure Method Statement including measures to protect otters will need to be put together for the site. These measures are considered appropriate and can be secured by condition.

Badgers

8.5.23 The site has heavy use by what is likely to be a single clan of badgers, there are 1 main, 2 subsidiary, 17 outlier and 1 disused setts on the site. There is an acknowledgement that a badger disturbance licence along with the provision of artificial setts and other measures will be required. Some setts have been closed as part of the PFA removal scheme, and some further setts will be closed under the minerals and waste scheme. The proposed Badger Mitigation Strategy (2020) sets out the potential impacts upon the remaining setts resulting from the residential development phase including highlighting potential issues with changing typography influencing the long term viability and stability of setts. The Strategy is broadly sufficient considered acceptable subject to the recommended updated badger surveys in advance of each phase of works and badger disturbance licences where required and the proposed enhanced setts, which can be secured through appropriate conditions.

Site Design and Biodiversity Net Gain

8.5.24 During the course of the application, both Local Authorities sought a Biodiversity Net Gain Calculation. This is a measurement of a sites ecological value, and is used to ensure that any new development provides an enhancement to biodiversity. This will be a requirement of the forthcoming Environment Bill, which will seek to ensure development delivers at least 10% biodiversity net gain, and at the time of assent is likely to be written into planning legislation. However to date this has not become a regulatory requirement, and both Local Planning Authorities do not yet have adopted planning policies on the matter. Nonetheless, this site is of strategic importance, and such values and enhancements should be considered.

8.5.25 The consultants have calculated that the site has an existing value of 613.55 biodiversity units in habitats and 17.70 units in hedgerows. The proposed development results in 621.28 biodiversity units in habitats and 18.75 units in hedgerows. The outcome of the assessment is a net gain of equivalent to an uplift of 1.26% in habitat units and 5.92% in hedgerow units.

8.5.26 Whilst it is recognised that this is not yet a legislative requirement or adopted policy, it is considered the proposed uplift is limited, taking account of the size and strategic nature of the site. However, further opportunities can be secured through condition that can increase this value of 1.26% uplift, which includes the provision of detailed habitat creation and landscaping proposals, details of ongoing management of those habitats and landscape features, details for reptile and amphibian habitat measures (and clarity around which of these are required for the licencing regime and which are considered ‘gain’).

8.5.27 The proposals identify possible recreation on the River Severn for water sports, and additional recreational access to the river bank and to the river itself. As an outline application there is limited details on such matters, and whilst approached cautiously, such activities will need to be appropriately considered under the reserved matters applications to ensure that these are managed to protect both habitats and wildlife.

8.5.28 The proposed masterplan also outlines development in close proximity to the riparian corridor. Largely this corridor is 90m wide but at the easternmost point the corridor the masterplan indicates this narrows to 30m, this should also be approached cautiously. Such details will need to be carefully considered during the reserved matters stage and the principles should have some flexibility around the exact placement and size of this development parcel on the site once the suitability of the surrounding vegetation and trees for retention has been assessed.

8.5.29 It is recognised that issues have been raised by both the general public and other interested parties in respect to the impact on the Natural Environment and Officers have considered this in great detail. It should be recognised that

the ES advises that the majority of the site features will have been lost as a result of the demolition works being undertaken on the site and therefore, the loss through the redevelopment of the site is minimal. Officers consider that this element of the scheme has been given significant consideration and appropriate mitigation measures sought to manage the impacts on the natural environment.

8.5.30 On the basis of the above it is considered that the proposed principles for this outline application are acceptable, and further enhancements and protection can be adequately controlled through condition and later reserved matters approvals. It is therefore considered that the proposed development complies with local plan policies NE1, NE2 and NE6, and the NPPF in relation to ecological matters.

8.6 Arboriculture

8.6.1 The application is supported by an Arboricultural Impact Assessment, which looks at the site in the context of the indicative masterplan and in recognition of the ongoing demolition works.

8.6.2 It is evident that previous tree management and maintenance of the site does not appear to have been undertaken with any priority or consideration to their asset value and this has resulted in a tree stock that is of a high value but requires management. Many of the tree species within the site should be considered as the 'usual suspects', fast growing (to cover and break up the hard lines of the large industrial buildings), self- set and 'pioneer' species known to establish on brownfield sites and colonise poor soil condition areas.

8.6.3 There are a number of Poplar trees within the site (Lombardy Poplar – *Poplus nigra 'Italica'*), that have been strategically planted. Many are planted in a linear fashion and are now achieving the purpose for which they were planted which was to shield the commercial buildings from views along Buildwas Road. The original Arboricultural Impact Assessment (AIA) did not show any of these trees as being retained but revisions received in August 2020 showed their partial retention. For the avoidance of doubt, a condition is considered necessary to secure the specific retention of these tree groups within the landscape in their entirety, which will continue to provide landscaping around the retained commercial structures.

8.6.4 In addition to this, the revision to the masterplan (August 2020) also saw a greater retention of tree belts to the west of the local centre, creating a character area ('Woodland') that is to be surrounded by woodland, and

forming an enhanced connection between the north and south green infrastructure.

8.6.5 There are also ‘groups’ of Poplar trees planted within the flood plain area, these are currently thought to be ‘hybrid’ Poplar trees. These trees are well established and serve a great purpose to their location; they obscure the power station from the Buildwas Road well and must be considered for retention in this current and future settings. Root systems of Poplar trees is expansive and aggressive and therefore it is important to ensure the proximity of development will not prejudice these trees, and will be carefully considered through reserved matters.

8.6.6 As a member of the Willow family, Poplar trees grow well in a riparian setting and are able to withstand waterlogged soil for a prolonged period. There are only a few tree species with this attribute and these should be explored further with regard to mitigation planting and further screening, as is determined through the planning process.

8.6.7 Along the riverbank (from the old pump house) towards the old road bridge access, (now closed) there is evidence of purposely planted trees, acting as a feature within the landscape. These are now mature Ash trees that are sadly host to Chalara and appear to be in decline. As a historic feature to the original power station that was on site this is a valuable link to the history of the site and requires a detailed assessment of the trees individually and recommendations for retention and/or mitigation planting in any future reserved matters application(s).

8.6.8 It is expected that there will be a substantial increase in the footfall within the nearby ‘Dale End Park’ which is a ‘jewel in the crown’ of Telford & Wrekin Councils park and recreation areas. Subsequently it is considered that it is necessary for the development to mitigate against this impact, through the provision of financial contributions towards the increased management and maintenance costs of this facility along with contributions towards specimen tree planting and enhancements to this area for existing and new residents to enjoy.

8.6.9 This development opportunity should be considered and embraced as a window to vastly improve the environmental aspects of this area, add to the biodiversity, increase the aesthetic values to the site and contribute towards the ecosystem services currently provided by what is on site now and the additions that can be included to make this a ‘stand out’ site.

8.6.10 At this stage the masterplan is only indicative and it is therefore difficult to comment in detail on tree loss/management, as the form of the development

is not yet determined. As such, appropriate conditions are required to ensure further detailed AIAs are submitted with each reserved matters application in addition to a number of restrictive conditions relating to the works themselves.

8.6.11 It is recognised that Severn Gorge Countryside Trust (SGCT) as a land manager adjacent to the site have not raised objections to the principle of development but, recognised that the proposed development will result in the increase of recreation use on their sites, and subsequently require appropriate mitigation. As part of their commentary on the application they have calculated what they believe to be the cost of additional management of the adjoining woodland (to the south of the site). This approach is considered necessary, and a financial contribution is therefore considered appropriate for this purpose. Following a second round of consultation, a further obligation was requested from SGCT which relates to ash dieback and seeking contributions from the development to combat this issue. This however is an existing and ongoing issue within the Gorge and would not meet the tests that it is necessary to make the development acceptable in planning terms. As such, this contribution cannot be provided to SGCT as requested.

8.6.12 Officers are satisfied that in its outline form, the development is acceptable from an arboricultural perspective subject to conditions and financial contributions towards offsite improvements in the public realm, and is therefore compliant with local plan policy NE2 and the NPPF.

8.7 Noise & Air Quality

8.7.1 The NPPF (paragraph 180) recommends that "*planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

> *a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
>
> *b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
>
> *c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."*

8.7.2 Chapter 12 (Noise & Vibration) of the Environmental Statement (December 2019) and its addendum (August 2020) provide details of the baseline noise

monitoring results. The location of the noise sensitive receptors have been acknowledged and are acceptable to the Local Authority, and are found to be a sound basis for the impact assessments submitted.

8.7.3 The Noise Impact Assessment concludes that "*No significant residual effects from noise and vibration are anticipated as a result of the construction or operation of the Proposed Development."*

8.7.4 Officers concur with this view and support the application subject to appropriate conditions, outlining further noise assessment/mitigation on a phased basis.

Construction Vibration & Effects on Buildings

8.7.5 As with all development, construction vibration has the potential to impact upon occupants of buildings within the vicinity of the works. The potential impact depends on the type of piling, ground conditions, and distance to NSRs. As part of the proposed development, it is anticipated that piled foundations will only be necessary in some localised areas and this will be determined at the detailed design stage.

8.7.6 In addition to human annoyance, building structures may be damaged by high levels of vibration. The levels of vibration that may cause building damage are far in excess of those that may cause annoyance. Consequently, if vibration levels are controlled to those relating to annoyance then it is highly unlikely that buildings will be damaged by construction vibration levels.

8.7.7 It is considered that the rating level of fixed plant noise sources should not exceed the prevailing background sound level when measured at the nearest NSRs. The cumulative effect of all external plant should be specified so that the rating level is less than or equal to the lowest prevailing background noise level.

8.7.8 It has not been possible to predict the noise levels likely to be experienced at proposed NSRs, as the exact location of the proposed dwellings within the development parameter plans is unknown. However, it is considered that the effect of construction noise will be **moderate adverse** at worst for existing and proposed NSRs, with the potential for a **major adverse** effect over a short-term period as a result of works taking place close to the receptors, most likely focussed around the access points on Much Wenlock Road and Buildwas Road.

8.7.9 With respect to vibration, there is the potential for effects at existing and proposed NSRs on Site, without the careful consideration of working practices. However, given likely setback distances and proposed techniques, it is likely that any effect would be limited to a temporary, **minor adverse** effect. Outline recommendations to mitigate against these impacts are therefore provided in order to minimise the effects of vibration upon existing

and proposed nearby VSRs. These will be controlled through a CEMP for each phase of the development, and are likely to include, but are not limited to:

a. Specification of suitable mechanical and electrical plant items

b. Construction hours, with house stipulated for any noisy activities

c. Use of hoarding around the site perimeter

d. Hydraulic techniques for breaking

e. Off-site prefabrication use where practical

Development Generated Road Traffic Noise

8.7.10 An increase in road traffic due to the proposed development has the potential to increase the noise levels at NSRs in the vicinity of the proposed development.

8.7.11 Traffic data has been provided as 18-hour Annual Average Weekday Traffic (AAWT) by the Transport Consultant for the following scenarios;

- 2019 Base Year;
- 2023 Opening Year without Development;
- 2023 Opening Year with Development;
- 2038 Future Year without Development; and,
- 2038 Future Year with Development.

8.7.12 The Basic Noise Level (BNL), as referenced in CRTN, has been calculated for the roads nearest to the NSRs, to predict the change in noise level between 2023 opening year without the development, and 2023 opening year with the development. The same has been done for the year 2038.

8.7.13 For a small area of the western edge of the proposed residential parcel facing out onto Much Wenlock Road, unmitigated noise levels in gardens facing out onto the road are likely to marginally exceed the upper desirable limit in the British Standard Guidance on Sound insulation and noise reduction for buildings BS8233. In order to reduce this by at least 2 dB, it is recommended that the first line of dwellings facing Much Wenlock Road are orientated so that garden areas are screened by the dwellings themselves. Adopting this approach should provide at least 10 dB reduction in resultant noise levels in gardens and would ensure that suitable noise levels would be achieved in garden areas across the Proposed Development.

8.7.14 For proposed dwellings closest to either Much Wenlock Road or Buildwas Road, with partially opened windows the adopted internal criteria set has been predicted to be exceeded by up to 7dB. Allowing for the typical double glazed

windows with trickle vents, the internal criteria for the buildings will be acceptable and ensure comfortable residential amenity.

8.7.15 No additional mitigation is required to control the effect of development generated road traffic noise. Therefore, there is predicted to be, at worst, a permanent, **minor adverse** effect as a result of the additional road traffic in the long term.

Noise from existing sources on future residents/uses

8.7.16 Noise from existing sources have the potential to affect proposed residential and educational uses on site. For residential uses, the noise assessment considers the daytime noise levels in outdoor living areas, and the daytime and night-time noise levels in future habitable rooms.

8.7.17 The upper limit for new build nursery, and primary school general teaching areas is 35 dB LAeq, 30mins, assuming a mechanical ventilation strategy. This can be relaxed by 5 dB should a natural ventilation strategy be employed.

8.7.18 Provided that the site is designed to these standards, there should be no significant adverse effect from a noise perspective. The offsite noise impacts associated with the proposed development are limited to development generated road traffic noise and onsite operational noise such as fixed plant and equipment.

8.7.19 The British Standard Noise Assessment BS4142 showed that, unmitigated, the night-time noise impact from the retained transformers and generator have the potential to result in a significant adverse impact in accordance with BS4142. However, the prevailing background noise level at night-time is very low, and the assessment does not take into account the fact that, during the night-time, the specific noise level will be experienced inside a bedroom rather than outside, and the BS4142 assessment makes no provision for this.

8.7.20 It is therefore considered that a rated noise level of 26dB LAr,15m during the night-time is acceptable in bedrooms and is unlikely to cause an adverse impact. Therefore, further mitigation is not considered warranted. It is important to note that there will be an intervening employment area will which will provide acoustic screening to those proposed residences.

Noise and vibration from the railway line

8.7.21 At this stage it is not possible to quantify the noise or vibration associated with the railway line at the proposed nearest sensitive uses, as it is not currently in use and there are insufficient details about the intensity of use or types of use. However, the potential effect has been considered at a high level.

8.7.22 Additional noise assessments will be required at the appropriate time, as and when any application comes forward for the use of the line as a passenger railway. In respect of its use commercially to remove materials off-site, this is not anticipated to be significantly greater than the former use. It is estimated that no more than 2/3 movements a day are expected. This is set out further in the section of this reports which provides a briefing on the associated minerals planning application.

8.7.23 Six monitoring locations were utilised in the Noise Assessment, 4 of which relate to properties below:

- Bridge House, Buildwas Road
- Buildwas Park, Much Wenlock Road
- Poolview Park Caravan site
- The Firs, Buildwas Road

8.7.24 All four of these locations were considered to have high sensitivity and the noise monitoring was undertaken over a 24-hour weekday period.

8.7.25 Some of the buildings associated with the existing use are to be retained, and do not form part of the proposals. The buildings are located to the north and south of the existing railway line. To inform the assessment, short-term source measurements were undertaken of the existing transformers in the vicinity of the southern building. Site observations indicate that the transformers emit a constant drone and ‘buzz’ that does not fluctuate significantly over time. The transformers also have switches associated with them, which can click approximately 20 times per day. There is low level noise from the remainder of the equipment, however this is masked by the noise from the transformers.

8.7.26 Attempts were made to measure noise from the plant associated with the building to the north of the existing railway line, however during attendance at a safe distance from the plant there was no appreciable noise being generated, with distant plant noise from elsewhere on-site dominating. Therefore, no further consideration has been given to that plant.

8.7.27 During consultation held between the applicants and Shropshire Council it was identified that the appropriate point at which to be able to undertake a meaningful assessment of the potential effect of the railway line on nearby existing and proposed sensitive receptors would be at the Reserved Matters planning stage. Given the lack of current detail it is considered that an appropriately worded planning condition is attached to any permission, requiring a further noise and vibration assessment once more detailed information is available. It is considered, however, that there is the opportunity to design out any potential issues and it is considered that, with such a planning condition, this will likely result in **minor adverse** effects.

Future baseline

8.7.28 It is considered that the future baseline will continue to be dominated by road traffic noise with some contribution from the transformers and generator plant for areas close to those sources. Therefore, the modelled scenarios for the opening year and future year without the development are generally considered to be representative of the future baseline noise conditions and not likely to be resultant to a significant change long-term. The site will be subject to construction hours, as will be set out and agreed in the CEMP, as well as specific hours stipulated for any “noisy activities”. This is generally accepted as 08:00-18:00 Monday to Friday, 08:00-13:00 on Saturdays and no noise activity on Sundays or Bank Holidays.

8.7.29 In mixed use applications there is the opportunity to design out any potential cumulative effects and therefore it is unlikely that there would be any significant adverse cumulative effects with attention to good acoustic design.

Air Quality

8.7.30 With reference to the Air Quality section of the Environmental Statement, the construction phase of the proposed development is predicted to pose a ‘risk of medium impact’ on dust soiling of nearby sensitive receptor and a low risk on human health from dust emissions for the typical stages involved in this phase (earthworks, construction and trackout). Recommendations for mitigation are therefore recommended in the supporting document, and include a dust management plan which would form part of the CEMP to be detailed at reserved matters stage.

8.7.31 The impact of vehicle emissions during the construction stage and operational stage is predicted to be negligible from the three main pollutants (PM2.5, PM10 and NO^2) and the considered effect at sensitive human receptors to be not significant i.e. will not be exposed to air quality exceeding the UK Air Quality Objectives. Pre-existing monitoring data that this department has collected has been considered in this calculation. This department also now monitor at a site approximately 1.5km from the site boundary on Madeley Road for NO_2. The impact of the development when in use ‘operational phase’ on nearby human sensitive receptor for the three main pollutants is considered to be negligible and considered ‘not significant’ upon the first occupation date of the development and that of completion of the development.

8.7.32 Having assessed the information provided it is considered that matters associated with air quality and dust management would not have an adverse impact on the environment or adjacent amenities and can be adequately controlled through conditions. The proposals therefore comply with of the local plan and the NPPF.

8.5.31 It is recognised that issues have been raised by both the general public and other interested parties in respect to the noise of the development on the wider area, in particular because of the rural nature of the immediate area, and the shape of the Gorge carrying noise to much higher ground at intensified volumes. It was noted by objectors that the Gorge is a valley which creates a tunnelling effect for noise and any impact would therefore be exaggerated. The noise report accepts the level of change but given the existing baseline noise levels, it is not considered that the operational form of the development will have any greater noise impact than what is currently experienced. Whilst some periods of noisy activities are likely to cause some noise disturbance, this will be monitoring and managed through the CEMP.

8.5.32 Officers consider that the proposal is acceptable subject to mitigation measures controlled through conditions and is therefore complaint with the NPPF and local plan policies BE1 and ER1.

8.6 Ground Conditions

8.6.1 Chapter 14 (Ground Conditions & Contamination) of the Environmental Statement (December 2019) and its addendum (August 2020) support the application.

8.6.2 This chapter is appended by the following reports:

- Prelim Risk Assessment and Ground Investigation Report
- Landslide Report
- Geological Report and Mineral Resource Assessment

8.6.3 It should be noted at this stage that paragraph 179 of the NPPF advises that "*where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. "*

8.6.4 The site falls within the Coal Authority Development Low Risk Area.

8.6.5 The scoping response provided to the applicants (ref 19/01779/SCO), by Shropshire Council prior to this application, advised that "*given the presence of low-level contamination across the brownfield part of the site particular care will need to be taken to ensure that such contamination is either removed or isolated where appropriate from potentially sensitive future uses in the east part of the site such as residential gardens…Consideration should be given to the use of surplus clean naturally excavated soil-making excavated materials from within the western part of the site (i.e. recovered as a by-product of mineral extraction) to supplement any soil shortfall in the eastern area (ideally mixed with organic material to create a topsoil). This may have the added benefit of allowing some very low-level contaminated materials in the eastern*

part of the site from being safely covered and isolated, subject to Environment Agency approval, rather than requiring their removal off site"

8.6.6 For the purposes of investigation, the site was split into 6 separate zone (see para 14.6.3 of Chapter 14 of the ES) with each zone being categorised base on its previous use when the Power Station was operational.

8.6.7 The site currently comprises the former Ironbridge Power Station which is currently being (in part) demolished. Historical mapping indicates that Ironbridge 'A' Power Station was constructed 1929-1932, with several railway lines traversing the fields. Ironbridge 'B' Power station was constructed between 1968 and 1969, and the former Power Station closed in 1980-1981 before its demolition in 1984. Since then, the site of the former Power Station has been used to deposit ash from the new Power station. The agricultural fields to the west have remained undeveloped.

Ground Contamination

8.6.8 Assuming there is no development at or in the vicinity of the Site that introduces new sources of potential contaminants of concern to the Site, it is anticipated that there will be no change to baseline conditions at the Site in the future, on the basis that risks from any new potential contamination sources are suitably mitigated in accordance with the requirements of the relevant environmental and construction legislation. Whilst demolition is ongoing, the works are subject to controls that will minimise the potential for impact. These will be set out in both the CEMP and the Remediation Scheme which is conditioned to this recommendation.

8.6.9 The risk assessments undertaken by the consultants have typically identified low risks to groundwater from contamination at the site, although a low to moderate and moderate risk to groundwater within the Glaciofluvial Deposits and inorganic contaminants respectively has been identified. Piling activities may create a preferential pathway for the downward migration of contamination within shallow perched groundwater and this will need to be monitored.

8.6.10 Ground investigations have identified elevated concentrations of contaminants within groundwater within the Glaciofluvial Deposits, at locations in close proximity to the River Severn. A Detailed Quantitative Risk Assessment has however concluded that there is no risk to water quality in the River Severn from the presence of inorganic contamination within groundwater.

8.6.11 The temporary nature of the construction works mean that ground gas risks to construction workers are likely to be negligible.

8.6.12 Construction will involve re-profiling of the Site to generate a series of development plateaus. Typically, these works will be minor on the steeply sloping southern boundary of the Site. The exception to this is within the south

west of the Site where major reprofiling works will be undertaken creating a 1 in 3 slope of circa 25 m height. This slope will be designed in accordance with the relevant quarry regulations and guidance and will be designed to be stable. Further loading or undermining of the slope by the subsequent development works may create instability. Without mitigation, there is risk of land instability at the Site.

8.6.13 Available information indicates the presence of a number of sources of chemical contamination at the Site. The results of the ground investigations indicate the presence of elevated concentrations of inorganic and organic contaminants and the presence of asbestos within the Made Ground soils. Adjacent and future site users (based on a mixed use development) may be exposed to the contamination identified without the implementation of appropriate mitigation measures.

8.6.13 The risk assessments have typically identified low risks to groundwater from contamination at the site, although a low to moderate and moderate risk to groundwater within the Glaciofluvial Deposits from PFOS and inorganic contaminants respectively has been identified.

Mitigation

8.6.14 A number of measures will be implemented during the construction phase to minimise potential impacts associated with the development. These measures are standard in construction projects and are in line with current industry good practice for construction on brownfield sites. These will be detailed in the Code of Construction Practice (CoCP) and the contractor's Construction Environmental Management Plan (CEMP). A detailed CEMP is conditioned to this recommendation.

8.6.15 A remediation strategy will be developed based upon the proposed development to mitigate risks to future site users, construction workers and adjacent site users from the chemical contaminants and asbestos identified at the Site. The remediation strategy will include a methodology for the implementation of remedial measures e.g. capping to mitigate risks from the presence of organic / inorganic / asbestos contamination and ground gas, depending upon the findings of the additional ground investigation and monitoring works. This is listed as a condition to this recommendation.

8.6.16 Should there be a requirement for piled foundations to be constructed as a foundation solution for proposed new structures, a foundation works risk assessment will be undertaken. This will determine the most suitable piling technique to be implemented, to minimise the potential for the downward migration of contamination within the Made Ground into the Glaciofluvial Deposits and this too is a condition of this recommendation. Slope Stability Appraisals will be undertaken to demonstrate that the proposed landform is stable in the permanent state.

Geology

8.6.17 The geological sequence at the Site is dominated by unconsolidated superficial deposits, principally within the valleys of the local watercourses, and underlying Silurian bedrock comprising dark mudstones of the Coalbrookdale Formation.

8.6.18 The superficial geology is dominated by Glaciofluvial Deposits (GFD) that extend inland, by up to c. 600 m, away from the River Severn. Alluvium is also present in the river valley and is therefore likely to conceal any residual GFD beneath. The British Geological Survey (BGS) state that the "sand and gravel is present either at or near the surface in a patchy spread. These deposits include sand and gravel deposited in contact with an ice sheet (either deposited by meltwaters within, below or in front of the ice sheet), or as glacial outwash plains (sandar) that are deposits with a high sand and gravel content that have a subdued topography".

8.6.19 Ground investigations undertaken at the Site and BGS borehole records have identified that the geology varies considerably across the Site.

8.6.20 Surface hardstanding was encountered within the much of the operational areas of the former power station, typically in relation to the presence of infrastructure including roadways, footpaths and car parks.

8.6.21 Made Ground was encountered over much of the Site but was noted to be thickest in the vicinity of the retaining walls at the former power station site and within the Pulverised Fuel Ash (PFA) mounds situated in the northern part of the Site. The composition of the Made Ground, outside of the PFA mounds, was noted to be variable in composition, but within the former power station area the Made Ground was noted to have a high proportion of ash.

8.6.22 The presence of Alluvium was noted to largely be confined to the northern part of the Site, in close proximity to the River Severn, and typically comprised a soft to firm organic clay or a red sand and gravel.

8.6.23 Glaciofluvial Deposits were typically encountered as sand and gravel underlying the Alluvium in the northern part of the Site. Further to the south, as the land starts to rise in the former power station area, the Glaciofluvial Deposits were noted to thin and become more cohesive in nature. Within the western part of the former power station site and the agricultural fields beyond to the west, the thickness of the Glaciofluvial Deposits increased substantially and typically comprised sand with variable proportions of silt / clay or gravel.

8.6.24 The depth to the Coalbrookdale Formation varied across the Site, with bedrock being encountered at shown depth within Zone 2 (southern part of the former power station area) and areas Zone 5 (eastern part of the former power station). The shallow depth of bedrock in these areas largely reflects the 'benching in' of Ironbridge B into the hillside during construction. Within

the western part of the Site (agricultural fields, Zone 1), BGS records indicate that bedrock lies in excess of 50 m below ground level, although the depth to bedrock decreases to the south, where land rises to the topographic ridge behind the Site and towards the River Severn to the north. Where encountered the Coalbrookdale Formation was noted to comprise stiff weathered clay overlying mudstone.

8.6.25 The minerals assessment ground investigation undertaken by Touchstone Geological Services Ltd (TGSL) in the western agricultural fields (Zone 1) encountered broadly similar ground conditions to those reported in Table 14.5, however, the Coalbrookdale Formation was encountered at much shallower depths in the southern portion of the site, being recorded between 1.20 and 15.40m bgl.

Hydrogeology

8.6.26 The Silurian mudstones that form the bedrock underlying the Site constitute a "low productivity aquifer" unit by the BGS. The Environment Agency (EA) designated the bedrock as a Secondary B aquifer unit, reflecting the fact that it contains *"predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. These are generally the water-bearing parts of the former non-aquifers"*. As such the bedrock is not expected to be a significant water bearing unit, but is expected to support perched groundwater when overlain by granular geological units such as the GFD.

8.6.27 The granular GFD are expected to constitute a locally important unconfined aquifer unit that may contain significant groundwater. This is reflected in their designation as a Secondary A aquifer by the EA as they contain *"permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers."*

8.6.28 During the previous investigations undertaken by RPS, groundwater was encountered within the former power station area as perched groundwater within the generally coarser Made Ground / upper granular layers of the Alluvium and a deeper groundwater body within the upper granular soils of the Glaciofluvial Deposits. Perched groundwater was also encountered within the upper layers of the weathered Coalbrookdale Formation, where bedrock was encountered at shallow depth.

8.6.29 The ground investigation undertaken on the proposed mineral extraction area by RPS and TGSL comprised twenty-four boreholes to a maximum depth of 24.80 mbgl and fourteen machine excavated trial pits to up to 4.50 mbgl. Groundwater strikes were not recorded during formation of these exploratory holes which penetrated both GFD and the Coalbrookdale Formation. A 6 month programme of groundwater monitoring of monitoring wells installed

during the TGSL / RPS ground investigation identified groundwater to be absent to depths of up to 22 mbgl and a minimum topographic elevation of 40.35 metres above Ordnance Datum (mAOD). The exception to this was within borehole IB 2019 018 where groundwater was identified to be present with a consistent elevation of c. 65.9 mAOD. Borehole IB 2019 0818 is situated close to the southern boundary of the Application Site where the contact of the GFD and the underlying bedrock rises and the corresponding depth to the GFD decreases. Based upon available evidence it is considered probable that the observed water levels in borehole IB 2019 018 may relate to a sump effect in the borehole associated with the basal rich layer. Furthermore, the localised nature of this occurrence indicates that perched groundwater within the GFD is unlikely to be a significant water resource.

8.6.30 Groundwater contained in the Glaciofluvial Deposits will likely flow north towards, and be in hydraulic continuity with, the River Severn which represents the principal groundwater receptor present in the vicinity of the Site. Although generally unconfined, groundwater present in the Glaciofluvial Deposits is believed to be confined underneath the cohesive Alluvium adjacent to the River Severn. In the southern part of the former power station area, the Glaciofluvial Deposits are thinner and more cohesive in nature. On this basis and taking into consideration the terraced nature of the power station area of the Site, it is considered that there is likely to be limited continuity between the north and south of the Site within this stratum.

8.6.31 Previous ground investigations at the Site have indicated perched groundwater to be limited in extent and discontinuous. Perched groundwater flow direction, particularly on the former power station site, is unclear and is anticipated to be inhibited by the presence of below ground structures and the terraced nature of the site.

Hydrology

8.6.32 The nearest surface water features to the Site are the River Severn that defines the northern Site boundary and a brook running close to the western Site boundary. In addition, a brook is culverted underneath the former coal stockyard area in the central part of the Site.

8.6.33 Within the former power station site, additional surface water bodies include coal stock lagoons, redundant interceptors, washdown pond in, water dock areas of the cooling tower complex and an oil reclamation bed / lagoon.

Land Stability

8.6.34 A site walkover, undertaken on 16th August 2019, of the Site indicated no global indications of significant instability. Along the southern boundary of the former power station site, local evidence of possible slope movement was observed, through titling trees and curved tree trunks.

8.6.35 Based on previous desk based RPS reports a moderate to high risk has been identified for landslides on site, particularly along the southwestern and southern boundaries of the Site. No on-site records are held for landslides on-site however they are shown to have affected both sides of the severn valley/Ironbridge Gorge.

8.6.36 The hazard potential map for natural landslides indicates that there are areas classified as Level C and D within the Site, which indicate a 'possibility of instability problems after major changes in ground conditions' and 'significant potential for slope instability with relatively small changes in ground conditions' respectively. Areas of potential instability are located primarily along the bank of the River Severn north of the Site and along the southwestern boundary of the Site.

Groundwater Abstractions

8.6.37 The Site is not located within a groundwater Source Protection Zone (SPZ) and there are no licensed groundwater abstractions within 500 m of the Site.

Surface Water Abstractions

8.6.38 There is one surface water abstraction licence from the River Severn and is associated with non-evaporative cooling, lake and pond throughflow and boiler feed for the former power station.

8.6.39 There are a total of 16 discharge consents into surface water within 500 m of the Site, the majority of which are for sewage / effluent related discharges.

Discharge Consents

8.6.40 There are a total of 16 discharge consents into surface water within 500 m of the Site, the majority of which are for sewage / effluent related discharges.

Waste Management Facilities

8.6.41 Published records indicate that 2 landfills are present within the boundaries of the former power station site, with the licence for one of these landfills is recorded to have been surrendered. Both of these are in relation to the deposition of non-hazardous ash materials and are considered to represent the deposition of PFA at the Site during previous operational activities at the former power station site.

8.6.42 Within Buildwas Quarry there is also a current licensed waste management facility to treat recycled secondary aggregate waste and subsoil/inert material.

Pollution

8.6.43 A total of 11 pollution incidents are recorded within 500 m of the Site. Two events relating to fires at Ironbridge B station have occurred, one significant incident in 1998 and one lesser incident more recently in 2014. Both events

have had the potential to cause contamination of the Site, due to run-off from contaminated fire water, fire-fighting foam and the mobilisation of contaminants from within the buildings. The ground investigations undertaken at the Site post-date the majority of these incidents.

Soil & Groundwater Contamination

8.6.44 The refined conceptual site model for the site in relation to human health contamination risks from the presence of soil contaminants concluded:

- Low risks from inorganic contaminants and no risks from organic contaminants under a commercial redevelopment scenario;
- Low to moderate risks from inorganic contaminants and low risks from organic contaminants under a residential redevelopment scenario;
- Low to moderate risks from inorganic contaminants and low risks from organic contaminants under a public open space (residential) redevelopment scenario;
- Low risks from inorganic and organic contaminants under a public open space (park) redevelopment scenario; and
- Moderate to high risks from the presence of asbestos.

8.6.45 Based on the findings of the risk assessments, it was considered that risks to human health from the presence of inorganic and organic contaminants could be mitigated through the implementation of simple remedial solutions such as capping and source removal. Recommendations were also made to mitigate risks to human health from asbestos contaminated soils through the implementation of a suitable remediation strategy. A remediation strategy is conditioned to this recommendation.

8.6.46 Officers consider that proposal is acceptable subject to mitigation measures and additional survey work controlled through conditions, the application is therefore complaint with the NPPF and local plan policies Be9 and BE10.

8.7 Heritage

8.7.1 The application is supported by Chapter 8 of the ES and its associated assessments.

8.7.2 The site lies immediately adjacent to the Ironbridge Gorge World Heritage Site (WHS) and the Severn Gorge Conservation Area (CA), and located within the application site are the grade II listed ‘Albert Edward’ railway bridge, and other non-designated heritage assets related to the earlier 1930s Ironbridge A power station – notably the former pump house and road bridge.

8.7.3 The adjoining WHS/CA also contains a number of grade II, II* and local interest buildings the setting of which the development could potentially impact upon.

8.7.4 At a national level the NPPF recognises that these assets are an "irreplaceable resource and should be considered in a manner appropriate for their significance." Para 192 states: "In determining applications, local planning authorities should take account of:

a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
c. the desirability of new development making a positive contribution to local character and distinctiveness."

8.7.5 The NPPF gives direction that in considering the impact of the a development on the significance of the heritage asset, associated weight should be given to the conservation of the asset in so much that the more important the asset the more weight is attached. Para 194 is clear that any harm to the significance of the asset should require clear justification, and any substantial harm to an asset of a Grade II listed structure should be 'exceptional' and to the WHS should be "wholly exceptional".

World Heritage Site and Conservation Area

8.7.6 The Ironbridge Gorge is of universal significance for its unique role in the development of the Industrial Revolution in the 18th Century. Within the WHS are substantial remains of furnaces, works, dwellings and transport systems relating to the individuals, communities, processes and products that made this area so important. The power station whilst sitting outside of the WHS is important to the setting of the WHS, which was served by a major railway and causeway that sits on the northwest edge of the WHS and is an important feature running through the designated area.

8.7.7 The WHS is designated as such because of its Outstanding Universal Value (OUV), having "cultural or national significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. As such the protection of this heritage is of the highest importance to the international community as a whole."

8.7.8 The WHS/ CA does not benefit from a designated buffer zone, however it is recognised through local and national planning polices that the setting is important, and further guidance provided by UNESCO, which recognises that 'actions taken in the buffer zone or wider setting of a property can also endanger its OUV.'

8.7.9 At a local level specific guidance for the protection to the WHS and the OUV is found within the WHS Management Plan (WHS MP) and the Conservation Area Management Plan (CAMP). The WHS MP was adopted in 2017, after the closure of the Power Station; it recognises that that any large scale development on the site may cause a potential threat to the setting of the WHS, and specifically requests all new development do not harm the OUV. The Severn Gorge Conservation Area Appraisal (TWC 2016) clearly states that 'development that adversely affects views, especially long range views in and out of the site can be viewed as harmful'. It is recognised that the green landscape in which the intense industrial activity of the 18th and 19th century took place contributes to the character and appearance of the CA and OUV of the WHS. It serves to demonstrate the historic contrast in landscape, use and activity of the industrial core of the area with its surroundings. The proposal must therefore address these matters.

8.7.10 Chapter 8 (Built Heritage) was revised in August 2020 to respond to the queries raised, both from our built Heritage Specialist, Shropshire Councils Historic Environment Team and Historic England. Further information was also provided during the course of the application highlighting a number of additional views including kinetic views with greater consideration to be given to the wider setting of the site and the resultant change in character/landscape including the submission of indicative cross-sections. This information demonstrates that there are some open views of the site from within the WHS/CA. Both the Landscape & Visual Impact Assessment (LVIA) and Heritage Statements conclude that there would be a 'neutral' effect on the WHS/CA, based largely on the repeated statement: 'any such views will be distant, partially screened and seen alongside the existing large 1970s switch house' (LVI 6.23).

8.7.11 It is clear that development on the east of the site would be set substantially closer than the switch house to the WHS/CA by some approximately 700m. The buildings cannot necessarily therefore be said to be viewed 'alongside' it and would have a more immediate impact, which has not been adequately modelled or demonstrated at this outline stage.

8.7.12 The Heritage Statement and LVIA both acknowledge that the 'Setting does contribute to the significance of the WHS, in so far as the wider gorge setting of the WHS forms part of its narrative, with the resources provided by this landscape a key reason for its development and role in the industrial

revolution.' (LVI 8.4.19), and that the 'pioneering intense industrial past within its green landscape' (ICOMOS) is a key part of the Outstanding Universal Value of the WHS. Although the power station site is outside the boundary of the WHS/CA, the views of isolated landmark industrial structures were consistent with this character. A major housing development of suburban character would have a quite different character, harmful to the setting of the WHS/CA which is currently experienced as a distinct settlement within a rural setting. The conclusion of a 'neutral' impact on the setting and significance of the WHS/CA is therefore contested at this stage, however it is reminded this only an outline application that established principles. Change does not mean there will be harm to the WHS, however this is has to be finely balanced, and without full design details at this sensitive location there is a need to reserve judgement and requirements for later states. It is accepted that there are distant views of the site from various points around the WHS/CA, Officers do not consider that these would have significant impacts on the setting as a whole. Whilst a change in character from industrial to residential is acknowledged, it must be considered whether the degree of change is significantly harmful or whether it can be designed out to minimise any perceived impacts. The loss of the cooling towers has seen a stark short-term change in the landscape and at present, views of the site are enriched by a greater natural backdrop but the impact and urbanisation that the towers had on the landscape must still be recognised. Whilst viewed by many as a local landmark, they did introduce a heavy mass of built form into an otherwise semi-rural setting which in itself had an impact on the WHS/CA (albeit recognising its connection to former industrial activities associated with the Gorge).

8.7.13 The revised Heritage Assessment assessed visual impact on the WHS, including by an LVIA, and concludes that there would be very limited inter-visibility between the WHS and development, and subsequently a low impact upon significance. Historic England (in their September 2020 comments) advised that they agree '*that the local topography will prevent significant views between the development and WHS, but in our view the analysis does overstate the effect of vegetation.'*

8.7.14 The limited inter-visibility between the development overall and the WHS does not, however, necessarily translate into a very low impact in terms of setting. The area of the development will be within the wider environment that the WHS is experienced within (the NPPFs definition of Setting), and so design of the development will be very important, both in terms of overall layout, and the design of individual buildings.

8.7.15 Subsequently it is considered that further details on such matters will need to be demonstrated within the reserved matters stages to ensure that the designs are appropriate and do not harm the OUV, mitigating where required,

and ensuring high quality, well defined spaces, landscape setting, and roofscapes and profile. It is therefore considered that the proposal results in less than substantial harm to the WHS at this stage, and the LPA is required to apply the tests of the NPPF paragraph 196. This specifically states where there is less than substantial harm, the LPA is to consider the application as a whole and making a balanced judgement significance of harm on the heritage asset; in this respect the impact on the setting of the WHS/CA and weighing this harm against public benefits including securing the optimum and viable use. Furthermore consideration is also made to the asset in the development site, taking account that the proposal will not result in the whole or part loss of any heritage asset in the site.

8.7.16 The redevelopment of the site seeks to secure a viable end use for a heavily financially burdened site. The costs of remediation alone is substantial and without a viable end use, the site would become derelict and dangerous. There is no doubt that the public benefits to the sites redevelopment are significant. In addition to the general condition of the site, its redevelopment will bring forward a variety of public benefits through the provision of housing, commercial opportunities, leisure facilities etc.

8.7.17 It is considered that with appropriate design, parameters and landscaping, that the development could be achieved in a complimentary manner to the heritage asset, taking account of its historic past and the impacts it may have on the WHS/CA. As such, it is considered by Officers that the public benefits of the scheme, including securing an optimum viable use for the site, weigh in favour of the development and the application therefore meets the tests of paragraph 196.

8.7.18 This is an outline application where such details of heights parameters, landscaping and design are not yet before us for consideration however to ensure that an appropriate design rationale is formulated for the site, a detailed design code is being sought by condition which not only considers general design parameters but specific elements including sections and modelling of key locations within the gorge, ensuring the design code is informed by a Heritage Impact Assessment, appropriate use of materials and reflection of site history. The design code is to be submitted concurrently with the first reserved matters application and thereafter used as a framework for subsequent reserved matters applications.

8.7.19 Conditions are also considered necessary to ensure the appropriate repair and reinstatement of both non-designed heritage assets; the pumphouse and Station A bridge and any works associated with the Albert Edward Bridge (Grade II) will form part of a separate listed building application which will be submitted by Network Rail in due course.

8.7.20 In recognition of the impact that the development will have on the locality, in various respects, it is recognised that the development will result in further pressures on the WHS and its fabric. The proposal sets out to achieve its own individual identity as a sustainable village; however its location in such close proximity to the WHS effectively creates an extension to the area, and will result in demand and use of the adjacent WHS. This in turn will have economic benefits through the additional footfall in the immediate area, however the use and demand at both a social and an environmental level may cause harm to the OUV of the WHS, and it is therefore essential this is carefully managed and mitigated against, reflecting on the sensitivities and objectives outlined in the WHS MP. Therefore it is essential the proposal provides off site mitigation through financial contributions that can then be set against the actions in the adopted WHS Management Plan.

8.7.21 Whilst not of direct relevance to Telford & Wrekin Council, the development will also have some impact on Buildwas Abbey. This matter has been left for Shropshire Council and Historic England to consider; Historic England advise that they do not have any overriding objections and agree that the development has limited intervisibility with Buildwas Abbey. They disagree with the applicants' statement that the land surrounding the Abbey was not important to the significance of the abbey as Cistercian monasteries were deliberately sited in remote places and were notes for their large rural estates. Historic England have therefore requested that the land adjacent Wenlock Road is not to be used for storage of materials but ultimately agree that the impact on Buildwas Abbey would also result in less than substantial harm requiring Shropshire Council to apply the tests of paragraph 196 of the NPPF.

8.7.22 It is recognised that issues have been raised by both the general public and other interested parties in respect to the impact local heritage assets and designations in the wider area. It is accepted that there are distant views of the site from various points around the HS/CA but Officers do not consider these to be a significant impact on the setting as a whole. We consider that the degree of change from industrial to residential is not significantly harmful and can be designed out to minimise any perceived impacts.

8.5.32 Officers consider that the proposal is acceptable subject to mitigation measures controlled through conditions and is therefore complaint with the NPPF and local plan policies BE1, BE3, BE4, BE5 and BE6.

8.6 Archaeology

8.6.1 Comments received from Shropshire Council Historic Environment team advised that the site includes the site of the former Ironbridge Power Station and two heritage assets lie partly within the site area; the Albert Edward

Bridge (a grade II listed structure – National Ref 1055277) and the site of a ferry across the River Severn (Shropshire HER No PRN34572).

8.6.2 The site has been subjected to a programme of assessment and evaluation as set out in Chapter 9 (Archaeology) of the Environmental Assessment. Submitted with the application. The ES concludes that on the basis of the negative results of the assessment and evaluation, no further archaeological mitigation would be required for this development. Shropshire Council Historic Environment team concur with this conclusion and do not suggest that any further archaeological work is required or conditioned to this recommendation.

8.6.3 The site evaluation report of January 2020 including results from a desk based assessment, geophysical survey and site evaluation (49 trenches across the site) conclude that some Neolithic pottery was discovered in a tree-throw in Trench 13, and some undated ditches and various relatively recent pottery and animal bones found. The results are indicative of land management and agricultural use over a long period of time and indicate limited archaeological potential. Nevertheless, Historic England advise that the Council may wish, if planning permission is granted, to condition an archaeological mitigation during construction so that unexpected discoveries may be recorded.

8.6.4 In consideration of this, Officers have taken the view that a condition should be imposed which requires the developers of the site to make contact with Shropshire Council Historic Environment Team should any features of archaeological interest be discovered on-site during construction. This is in recognition of this history of the site and the unknown level of archaeology which maybe discovered under the PFA mounds; including the potential ruins of the former Power Station ‘A’.

8.7 Landscape

Landscape Setting

8.7.1 Whilst touched upon in the heritage section of the report above, this section of the report looks at the wider landscape setting, as well as the on-site landscaping strategy.

8.7.2 Chapter 6 (amended) of the ES is subdivided into the following sections, as well as an overall Landscape & Visual Impact Assessment.

- Viewpoint Locations and Public Rights of Way
- Viewpoint Photographs
- Location of Reg 25 Requested Viewpoints
- Reg 25 Viewpoint Photographs

- Green Infrastructure and Landscape Strategy
- Landscape Sections
- Landscape Vignettes

8.7.3 The design and access statement also includes:

- Part 7 Flood Risk & Landscape
- Part 10 Landscape Strategy

8.7.4 The preliminary study area for the LVIA was defined at 3km from the site and was then refined based on computer generated 'zone of theoretical visibility' which allowed for a greater focus on the key sensitive receptors (both landscape and visual) and the likely significant effects which may arise as a consequence of the proposed development. Views raised by Shropshire Council through their scoping opinion, and those raised during the Reg 25 request for additional information from SC/TWC have been considered.

8.7.5 The entire site is over 350 acres in size, of which about 110 is greenfield. Only around half of the greenfield area will be developed, the remainder will be used for ecological purposes i.e. habitats for great crested newts and bats. Whilst the remainder of the site is brownfield over 70 acres of this will still be open space in the form of sports pitches, parkland and woodland.

8.7.6 The site sits within a transitional part of the landscape where the broader rolling slopes and agricultural parts of the River Severn valley, passes into the steeper sided wooded slopes of Ironbridge Gorge. The scale of the site is such that it sits across a relatively broad area of the landscape and is influenced by different parts of the transition, as well as the different context of the river valley base, sides and hills.

8.7.7 The site itself is not subject to any specific landscape designations. However, there are a number which fall in the wider landscape study area and are some related designations present both on site and across the wider landscape. These are set out below:

Designation	**Description**
Ancient Woodland	Numerous areas in surrounding area including parts of Tick Wood and Banghams Wood, immediately to the south of the site.
Area of Outstanding Natural Beauty (AONB)	Shropshire Hills AONB located immediately to the west of the A4169 Much Wenlock Road, close to the western boundary of the site.
World Heritage Site	The Ironbridge Gorge World Heritage Site is located adjacent to part of the site's eastern boundary, near

	to Benthall Hall Wood and 'The Meadow' (effectively ending at the alignment of the rail line and Albert Edward Bridge).
Scheduled Monument	Several Scheduled Monuments surrounding the site, including Buildwas Abbey which is located immediately to the west of the A4169, ca. 10m from the very northwestern corner of the site.
Site of Special Scientific Interest (SSSI)	Several SSSI are present in the surrounding area, including the Buildwas Sand Quarry SSSI, which exists in two areas located adjacent to part of the western site boundary and ca. 75m from the western site boundary respectively. The Tick Wood and Benthall Edge SSSI lies immediately south of the site, bordering the southern site boundary in part and overlapping into the southern area of the site in three areas.
Conservation Area	Severn Gorge Conservation Area located adjacent to part of the site's eastern boundary, near to Benthall Hall Wood.
CROW Access Land	Several areas of CROW Access Land to the south-west of the site in the village of Homer (south-west of A4169), the nearest area ca. 2.7km from the site.
Listed Buildings	Several within the surrounding area including the Grade II listed Albert Edward Bridge located along the site's northern/eastern boundary. The Grade I listed 'Abbey House with Attached 5 Bay Arcade Incorporating Dovecote' and 'Buildwas Abbey comprising Guardianship Monument and part of Claustral Ranges in grounds of Abbey House' are located ca. 155m and ca. 185m to the west of the site respectively.
Local Nature Reserves	Several to the east of the site (near to Lincoln Hill).
Local Geological Sites	Several in the surrounding area and partially within the western site area (east of the A4169 road corridor).
Local Wildlife Sites	Numerous in surrounding area including along River Severn (within site boundary) and Audience Wood (immediately south of site).
Green Network	Extensive areas east of site and partially within eastern site area (east of Buildwas Road).
Strategic Landscape	Wrekin Forest (north-west of A4169).

8.7.8 The site is seen in a series of parcels; river frontage, central, eastern and western, and their varying characteristics are discussed in the LVIA.

8.7.9 In terms of Landscape Character the site is defined within various published guidance as follows:

- National level – Majority within National Character Area (NCA) 65: Shropshire Hills (part of the eastern area located within NCA 66: Mid Severn Sandstone Plateau);
- County Level – Shropshire Landscape Assessment: Majority within Landscape Description Unit (LDU): Wooded Estatelands, with sections of the northern area located within LDU: Riverside Meadows and a small part of the southern area located within LDU: Principal Wooded Hills; and
- Shropshire Landscape and Visual Sensitivity Assessment: Sensitivity Parcels: 63IBG-A, 63IBG-B and 63IBG-C.

8.7.10 The site is located within the study area used in the adjacent authority of Telford and Wrekin; this includes a Landscape Sensitivity Study (February 2014), however although the site is within the broad study area, it is not addressed within any of the specific sensitivity parcels as it falls outside of the administrative boundaries.

8.7.11 Emerging Shropshire Council Policy S20, as discussed above, sets out a number of guidelines for the masterplan to meet. The Landscape Chapter of the ES advises that the relevant landscaping points are d), h), i), n), o), q) and where appropriate they will information the landscape strategy for the site.

8.7.12 Shropshire Council commissioned Gillespies to produce The Shropshire Landscape and Visual Sensitivity Assessment (LVSA), this was subsequently published in November 2018. The Shropshire Hills AONB Management Plan 2019-24 (Public Consultation Draft, 15th November 2018). The Management Plan sets out that it seeks to define the approach to conserving and enhancing the natural beauty of the AONB through the application of 'local solutions to local challenges' with the management plan setting out a series of policies which are discussed in the ES.

8.7.13 In respect of the setting of the AONB (Policy P1), the Management Plan suggests measures to consider and mitigate such impacts. These include:

- care over orientation, site layout, height and scale of structures and buildings
- consideration of the landscape, land uses and heritage assets around and beyond the development site; and
- careful use of colours, materials

8.7.14 The LVIA concludes overall, the proposed development will result in some limited impacts at a localised level. Effects on landscape character are not

considered to be significant; for visual effects a small number of individual receptors (including ones 'on site') have been identified as significant, however in the balance of the wider views/visual amenity these are not considered significant overall.

8.7.15 Following receipt of a revised LVIA, consideration of further viewpoints and liaison with the lead authority Shropshire Council, Officers are satisfied that that the development is considered acceptable in wider landscape and visual terms.

On-site Landscape Strategy

8.7.16 The application is supported by an indicative masterplan and a landscape strategy. Whilst this is an outline application and details of proposed landscaping are not yet known, these plans provide a framework to which subsequent reserved matters applications will follow and form a series of documents that would be conditioned to any consent.

8.7.17 The Landscape Strategy plan sets out 7 key areas relating to the on-site Green Infrastructure, these are:

- Enhancement of the existing blue corridor (i.e. River Severn frontage);
- Central green corridor to link the north (River Frontage/Sports facilities) to the south (woodland) of the site;
- Central green corridor along the rail infrastructure to provide a link from the north (River Frontage/Sports facilities) to the east (woodland and Severn Valley Way)
- Green corridor to link the centre of the site to the Shropshire AONB (south-west);
- Green corridor to link areas of existing woodland along the southern boundary where pinchpoints currently arise;
- Public open space (throughout the site) retaining existing vegetation where possible;
- Ecological enhancement area to the south (existing bat house and GCN ponds).

8.7.18 The proposed landscaping strategy has been designed taking account of site constraints and the proposed character areas, as well as incorporating mitigation measures for biodiversity and Officers believe it provides a sound framework for any subsequent reserved matters application.

8.7.19 Officers consider that the proposal is acceptable subject to future landscaping details being controlled through conditions and is therefore complaint with the NPPF and local plan policies NE1, NE2, NE4, NE5 and BE1

8.8 Sport/Recreation

8.8.1 The LPA believe it is essential that all new developments make full provision for the infrastructure/amenities and services which they create. New residents to the area will increase demand upon the existing recreational resource. The development will contain a number of properties which will contribute to the need of recreational facilities for the area. The proposed development triggers the need for a number of onsite facilities to meet the need arising from this development an offsite contribution towards improving a nearby facility is required in accordance with Policy NE4.

8.8.2 The original submission highlighted a number of concerns as summarised below:

- A Neighbourhood Equipped Area of Play (NEAP) should be provided on the basis that the nearest facility is in Broseley. This should incorporate a Multi use games areas (MUGA);
- More detailwas required to demonstrate how the development will meet the play needs of children arising from the development
- The existing sports field has been used historically for both football and cricket and this should be reinstated;
- The prosed sustainable village misses the opportunities to provide a Central Village Green;
- A Leisure Strategy should support the application, looking at existing facilities and indicate how the development will meet highlighted needs in the locality.
- Various details would need to be conditioned relating to Landscape Management (inclusive all the public realm areas), strategies and implementation of the sports facility, allotment design and implementation, NEAP/LEAP design and implementation, management for the community uses etc.

8.8.3 The applicants were very receptive to these comments subsequently sought to address the matters submitting a Leisure strategy to supplement the revised Illustrative masterplan. All of the points raised above have been considered and factored into the development. A New combined NEAP/LEAP is proposed, a multi-use sports pitch and pavilion (including parking area) will be provided, a more central village green now adjoins the sports pitches and

provides an improved connection to both the Local Centre and surrounding green infrastructure. The applicants have also accepted the proposed conditions and S106 trigger points for the matters raised above.

8.8.4 Sports England provided comments on the application advising that across Shropshire, there is a small amount of spare capacity in most pitch sizes for football, with the exception of youth 11v11 pitches where there is a shortfall of provision. In the south east sub area, which includes this application site, there are reported shortfalls of provision on adult football pitches. For cricket, the picture is there is a shortfall of capacity across Shropshire on Saturdays with some spare capacity on Sundays. Future demand will exacerbate the shortfalls of provision on Saturdays.

8.8.5 A Playing Pitch Strategy (PPS) is being undertaken by Shropshire Council, with involvements from Telford & Wrekin Council and at the time of writing was at an advanced stage. The PPS summarises the currently supply and adequacy of facilities in the area and outlines the demands going forward. The PPS assessment sets out that the site contains a disused sports field that previously accommodated two adult football pitches and a 5 wicket grass cricket square in addition to a poor quality clubhouse, with the intention to retain the playing field as part of these proposals. Whilst the Strategy and Action Plan are still being finalised, it is likely that this will include recommendations to protect the supply of existing pitches and bring lapsed sites (such as the playing fields within the application site) back into use to address the identified shortfalls of provision. The provision of a cricket pitch with a minimum of 5 senior grass wickets would likely address the projected shortfalls of provision in the south east sub area, and provide for several local clubs within the catchment of the site.

8.8.6 Given the emerging findings in the PPS, it is likely that provision for both football and cricket would make a positive contribution to meeting local needs for these sports. The commitment to providing suitable changing provision is noted, and as previously set out, it is recommended that this should include as a minimum 4 team changing rooms and associated officials changing rooms and associated rooms for stores etc. A social space with a kitchen will be required to function appropriately cricket. It is also noted that the management of the pitches is to be confirmed with the preference to be managed by a local club. These details can be secured via a suitably worded s106 agreement and associated planning conditions.

8.8.7 Officers consider that the proposal is acceptable subject to conditions and appropriate S106 triggers, that the site is complaint with the NPPF and local plan policies NE4 and NE5.

8.9 Education

8.9.1 The development site sits in the catchment area for Shropshire Local Education Authority (LEA) and therefore the associated primary school catchment of Buildwas Academy, and secondary catchment of William Brookes (Much Wenlock). Buildwas Academy currently has 19 surplus places, which will be filled on completion of the first 100 dwellings, by pupils from the development. It should be noted that currently 53% of pupils attending Buildwas Academy are Telford and Wrekin Pupils. William Brookes School currently has 12 surplus places and so will fill on completion of the first 100 dwellings. Currently 30% of pupils attending William Brookes are Telford & Wrekin pupils approximately 49 per academic year group.

8.9.2 Upon initial consideration of the application, Shropshire LEA estimated that school places will be required to meet the needs of an additional 103 nursery pupils, 177 primary pupils and 141 secondary pupils. Existing nursery and primary provision are therefore unsuitable and consequently new provision will be required. It was also highlighted that additional secondary school classroom capacity *may* also be required at the William Brookes School.

8.9.3 Telford & Wrekin LEA however raised concerns that this approach would result in a significant pushback of Telford & Wrekin pupils having to be accommodate elsewhere in the Borough; and as a consequence considered the proposed development needed to be adequately accommodated without detriment to the existing provision. Furthermore Telford & Wrekin LEA also considered that the level of provision required will be higher than that calculated by Shropshire LEA, based on the different level of educational demand/ demographics identified in the Telford & Wrekin area, as set out in the Councils adopted model. A comparative table of the differences are set below.

	Shropshire LEA estimated pupils based on 1000 units	**T&W LEA estimated pupils based on 1000 units**	**Variation**
Early Years	103	120	17
Primary	177	280	103
Secondary	141	160	19
Post 16	0	70	70

8.9.4 The differences in opinion between the Local Authorities, resulted in the need for an independent assessment of the requirements. Telford & Wrekin therefore requested an independent review to confirm the required numbers, and where the numbers should be mitigated. This brief was agreed with Shropshire Council. During these initial discussions it Shropshire LEA

undertook discussions with Buildwas Academy in relation to the short-term impact of Primary School pupils to identify if this could be catered for by the existing school at Buildwas. It became apparent that the capacity at Buildwas School was greater than anticipated with the ability to increase this capacity be providing a demountable and also relocating preschool children to the village hall. As such, it has been agreed between the LEA's that there will be no impact on the primary school provision and no pushback on Telford & Wrekin pupils in the short-term, ahead of the new primary school being constructed.

8.9.5 The secondary school calculations for the LEA's however remained at odds and it was apparent to Officers that in order to be transparent, a formal assessment was still required and Turleys were instructed to consider the secondary school impact. This assessment was to ascertain the correct demographics to be utilised, the impact the development would have on education, and whether as non-lead authority, Telford & Wrekin Council had the right to contributions to mitigate against this impact. It should be noted that Telford & Wrekin Council always remained of the opinion that a financial contribution would not be the appropriate solution, as secondary schools in the south of Telford having limited opportunities for expansion. Their ideal scenario was always that the William Brookes School (Much Wenlock) should be expanded to accommodate 160 pupils, rather than 141 set out by Shropshire Council.

8.9.6 Following lengthy discussions with Shropshire LEA, and a request from Turleys for baseline data to undertake the assessment, Shropshire Council agreed to request to seek an extension to William Brookes to accommodate the anticipated 160 secondary school pupils arising from this development. Shropshire Council have now agreed to change the secondary school pupil yield to match that proposed by Telford & Wrekin Council and an appropriate uplift in the education contributions have been included within the S106 agreement.

8.9.7 This uplift equates to increase from 140 secondary pupils to 160 secondary pupils, equivalent to an increase of £400k to accommodate those pupils in an expansion to Williams Brookes.

8.9.8 The Councils Education and Skills Department are now satisfied that the application can be supported, subject to the contributions set out below and appropriate trigger points for the construction of the new primary school, and will therefore meet the aims of the Local Plan and be compliant with the NPPF.

8.10 <u>Healthcare</u>

8.10.1 At the time of writing, the Clinical Commissioning Groups (CCG) has submitted a late formal comment on the application advising that it was undertaking a review of healthcare facilities in the area. The CCG has also been involved in Shropshire Councils Planning Policy consultations on Strategic Land Allocations. The initial formal planning consultation for this cross boundary application took place some 16 months ago and whilst stating an indicative capital sum these late comments do not yet fully define or evidence the nature of the increased healthcare requirements linked to the proposed development. Instead CCG advise that the proposals should address health care matters arising from the development, and indicated that in the event the outcome of the engagement process was to pursue the option of a new health hub, this could take the form of a capital sum (CCG have requested £1.27m) and, if required, a serviced plot within the site.

8.10.2 It is understood that there are concerns raised locally by both residents, Ward Members and the medical practice in T&W regarding potential merging of the practices and/or the loss of the T&W practice from its current location.

8.10.3 The LPA is not in control of healthcare matters, with the CCT exercising a separate responsibility for this. However it is essential to set out that whilst Telford & Wrekin support the provision of health care facilities to mitigate against the effects of this development, this should not be to the detriment of the existing population. As such, the LPA does not support the loss of any facility within the boundary of Telford & Wrekin. The CCG are requested to consider these matters carefully before making any decision to ensure the existing population supported by the local Ironbridge Medical Centre is not prejudiced by this development

8.10.4 The CCG have requested the provision of a serviced plot and a contribution of £1.27m. However this is not yet fully evidence based, and there is no wider precedent for this level of health care contribution taking account of other major development across the borough. Without a detailed evidence base the ability of the LPA's to accommodate the CCG's request is limited, taking account also of the significant viability issues raised by the proposals. It is therefore concluded that this figure cannot be achieved, but that the proposal should provide a serviced plot alongside a maximum contribution that will be determined through CIL.

8.10.5 It is recognised that issues have been raised by both the general public and other interested parties and as mentioned above, these issues are not in the control of the LPA albeit the concerns of residents have been voiced to the CCG directly.

8.10.6 Officers consider that the proposal is acceptable in this respect, subject to the contributions set out in the S106 agreement and is therefore complaint with the NPPF and local plan.

8.11 Railway

8.11.1 The existing rail access to the power station site is to the east of the site, over the River Severn by the means of the Grade II listed Albert Edward Bridge. The Railway bridge is made of cast iron and built in 1863 by John Fowler, Engineer.

8.11.2 The bridge has a finite load bearing capacity and has a main span across the river of 160ft. The identified span was provided in order to give free and unobstructed flow through the bridge when the river is in flood. Another reason was to make rail the only access point to the site for heavy plant and fuel deliveries, as the roads surrounding the site are very hilly. After the bridge connection, the railway track extends within the site through an internal rail system leading to and between the discrete elements of the site.

8.11.3 It is proposed that the existing railway, as part of this application, will provide:

- A means to export material out of the site, both during mineral extraction and the construction phases; and
- A continued heritage asset due to its listed status.

8.11.4 In terms of the mineral exportation, this is set out below. Network Rail are currently reviewing the works necessary to repair the Albert Edward Bridge and this will be subject to a separate listed building application which have been advised is due imminently.

8.11.5 The potential for a passenger light rail is currently being explored by the applicants. They are working alongside Telford & Wrekin Council in seeking funding to undertake a feasibility assessment for this proposal. In addition, Harworth are currently in liaison with a national light rail company whom are looking to undertake some tests on the on-site railway sidings with a possible view to expanding into Telford should the feasibility assessment be favourable.

8.11.5 It should be made clear that at this stage the passenger rail is only aspirational and does not form part of the application, or recommended planning consent. It is recognised that this is as an important opportunity to explore as set out in within the WHS MP, providing a sustainable connection from the WHS to Telford Town Centre.

8.11.6 Should a passenger light rail not be feasible, it is expected that the applicants would work with both Councils to create some form of ‘rail to trail’ green infrastructure route that compliments the existing Green Routes strategy that Telford & Wrekin have in place. These details will come forward as the site progresses but there is currently no set timescales.

8.12 Public Rights of Way

8.12.1 There are a number of public rights of way which both dissect the site and surround its boundaries.

- An anomalous restricted byway enters the site and goes beyond the entrance to the Park View caravan park (0409/16/4) and upto the existing access gates into the Power Station. This will form a new adopted highway and will be incorporated into the designs for this highway;
- A bridleway (0409/UN1/1, 0409/156/5, 0409/16/6) follows along the lines of the access track to the caravan park and will be unaffected by the development but with possible enhancement/resurfacing if necessary;
- Two footpaths cross the western field (0409/13/1 and 0409/14/1) and will be impacted by the development and require rerouting;
- A network of footpaths surround the site, with key routes being the Severn Way and the Severn Valley Way and it has been closely considered how the development will both impact these and provide enhancement.

8.12.2 On-site it is proposed that a new pedestrian/cycle corridor will pass through the open-space to the south of the site, providing a direct sustainable connection from the east of the site (the Severn Valley Way) to footpaths located on the west of Much Wenlock Way (0409/4/1) and further afield. This corridor will pass alongside the ancient woodlands, passed the proposed allotments and alongside the habitat mitigation areas.

8.12.3 A further on-site pedestrian/cycle corridor will pass through the open space to the north of the site, along the river frontage. This will provide access to possible river/leisure activities and also to the enhanced sports pitches/pavilion. Furthermore, the ‘A’ station bridge is intended to be reopened for pedestrian movement, providing a direct connection to the Severn Way on the opposite side of the river.

8.12.4 Both these proposed routes will connect to the Severn Valley Way on the far east of the site and it is recommended that they are added to the Definitive Map of Public Rights of Way by way of a creation agreement made under section 25 of the Highways Act 1980.

8.12.5 The Severn Valley Way is the primary sustainable route leading occupiers/users of the development into Ironbridge. It is already a widely utilised route but with increased footfall mitigation will be required to support the increased demands and enhance the opportunities to make the route more multi-functional, providing a sustainable connection that can reduce car

journeys into Ironbridge. Subsequently it is considered a financial contribution is required for its enhancement.

8.12.6 In further recognition of the increased footfall associated with this development, and the likely impacts this will have on public rights of way and their management/ improvements, contributions are also being sought for the upgrade of the Severn Way (leading from the site towards Buildwas only) and also towards management/maintenance of the Benthall Edge and Tick Wood SSSI managed by Severn Gorge Countryside Trust (SGCT) as discussed above.

8.12.7 Accordingly it is considered this matter is compliant with the NPPF and local plan policies C1 by promoting alternatives to the car, and C3 addressing the impact of the development.

8.13 Impact on the amenity of adjacent properties / uses

8.13.1 Whilst recognising the site is a major development and the change in character of the site and the increased usage will have some impact on adjoining properties/use, direct impact on the amenity of adjoining residential properties is considered to be limited.

8.13.2 The nearest residential properties to the development are the Pool View Park residential and holiday park which are located on the southern boundary of the site. The nearest property is located over 50m from the site boundary and an even greater distance from the nearest proposed dwelling (separated by open space), as indicated on the indicative masterplan. It is therefore considered by Officers that the impact to the residential amenity of these properties is limited.

8.13.3 On the northern side of the River Severn are a number of residential properties and guest houses. Again, all of the existing properties are located some distance from the site boundary (in excess of 60m) and separated by existing mature planting and proposed areas of open space. It is therefore considered by Officers that the impact to the residential amenity of these properties is limited.

8.13.4 Whilst not directly relevant to the considerations of Telford & Wrekin Council, there are a number of properties on the western edge of the site (adjoining the Much Wenlock Road A4169). Two properties are located at the entrance to Buildwas Abbey and whilst they will experience some impact from the development, it is not considered significant or direct. The properties face towards the existing/proposed sports provision. Additionally, there is a small cluster of properties located on the south-western edge of the development (Mill Farm, Hill View Farm) that are in close proximity to the proposed

roundabout into the application site. During the course of the application, Shropshire Council Officers held site meetings with the landowners to assess the impact on these properties and as part of these considerations, sought an amendment to the application which saw the proposed roundabout moved further south. The primary purpose of this was to provide a direct access to the farms off the proposed roundabout.

8.13.5 Subsequently it is considered that the proposal at this outline stage complies with the local plan BE1 and guidance contained within the NPPF.

8.14 Mineral Extraction

8.14.1 The minerals application (Shropshire Council ref: 19/05509/MAW) relates to part of the site of this outline application. The minerals application site covers an area of 49ha, which includes agricultural fields and derelict brownfield land and the below details have been provided by Shropshire Council as a briefing note, to provide a background to the application.

8.14.2 The proposed extraction will release an additional 1.9 million tonnes (mt) of saleable sand and gravel over a period of 5 years. The site will be extracted and restored in a phased manner. Part of the application site includes land within the former operational area of Ironbridge Power Station where demolition is nearing completion.

8.14.3 There are two key reasons why the sand and gravel resource underlying the application site requires extraction.

- Firstly, prior extraction will prevent sterilisation of the safeguarded mineral resource.
- Secondly, the Economic Growth Strategy for Shropshire and Shropshire Councils current Local Plan (Core Strategy) recognise the opportunity to redevelop the Former Ironbridge Power Station site and identify it as a preferred strategic site. The proposed masterplan redevelopment scheme involves the construction of residential dwellings, employment land, infrastructure, internal roads, etc within the application area and will require an engineered development platform to be created.

8.14.4 Access to the site is by a private road which runs along the northern boundary of the Buildwas Quarry, off Much Wenlock Road.

8.14.5 A new processing site will be constructed on the former Coal, Biofuel and PFA storage area of the power station. The plant will allow the dry screening of mineral. Mineral will be transported to the processing area via dump truck across the private road which connects the Caravan Park. The phased nature of the development means that operations will move progressively around the site, meaning that any effects will be of limited duration at any particular point in time.

8.14.6 The proposal involves transporting the 75% of the mineral via rail utilising the existing infrastructure of the Power Station and 25% via HGV.

8.14.7 Two restoration schemes have been prepared, one support the Masterplan redevelopment scheme if approved. The other to agricultural land if the Masterplan development is not permitted.

8.14.8 The applicant advises that with regard to the principle of development, if no mineral extraction takes place prior to the proposals for non-mineral development, it will result in the unnecessary sterilisation of the mineral resource. Furthermore, the 'do nothing option' prevents the creation of the development platforms required to deliver the Masterplan development.

Environmental Assessment of the Minerals Application

8.14.9 A Landscape and Visual assessment concludes that any landscape and visual effect resulting from the development would be progressive and localised. The Applicant will ensure that extraction and, more importantly, restoration would be carried out sympathetically and to a high standard.

8.14.10 An ecology report concludes that overall, the proposed development will not have an unacceptable impact on nature conservation and ecology.

8.14.11 An agricultural land survey concludes that soils would be protected either for restoration to agriculture or for use as part of the landscaping works for the masterplan development.

8.14.12 A heritage impact assessment finds that there would be no unacceptable impacts on any heritage features. An archaeological watching brief condition would be applied.

8.14.13 The Environmental Statement concludes that there would be no unacceptable noise or air quality / dust impacts given the proposed mitigation measures.

8.14.14 A transport assessment finds that the local road system is suitable to accommodate the level of HGV traffic likely to be generated by the proposals, with the bulk of mineral being exported by rail. A legal routing restriction would direct mineral HGV traffic away from Ironbridge, Much Wenlock and local minor roads.

8.14.15 A hydrological assessment concludes that there would be no unacceptable impacts on the water environment.

8.14.16 One public right of way crosses the site and would be diverted.

Planning Consultations

8.14.17 The application has been subject to detailed planning consultations. The AONB Partnership has objected based on concerns about the setting of the

AONB and has requested that the green field area is not disturbed. An updated LVIA addresses this matter. There have been no objections from statutory consultees. Shropshire Council's landscape consultant has not objected subject to a condition that the minerals scheme does not proceed unless the Masterplan development has first been permitted.

Conclusion

8.14.18 In conclusion, the proposals would prevent sterilisation of an identified mineral resource and would allow the formation of a development platform for the masterplan development. Setting the land down relative to the current situation would also facilitate improved screening of the western part of the masterplan development including from the AONB and Buildwas Abbey Scheduled Ancient Monument. No statutory consultees have objected and no unacceptable impacts have been identified after mitigation is applied.

8.14.19 The application is scheduled to be reported to the meeting of Shropshire Council's southern area planning committee on 15th June 2021.

8.15 Financial Contributions/ Legal agreement requirements / Memo of Understanding

8.15.1 A Development Viability Review by Tustain Associates Limited (September 2020) was submitted by the applicant. This was independently reviewed by Turleys jointly on behalf of Telford & Wrekin Council and Shropshire Council and found to be acceptable.

8.15.2 The Viability Assessment concludes that given the extensive former industrial uses and the legacy of these operations, the site is subject to significant viability challenges. Specifically, the high infrastructure and abnormal costs amount to £62.84 million. As a result, the development is only viable with the provision of 5% affordable housing and £16.75 million toward Section 106 and CIL contributions.

8.15.3 Following the receipt of final consultee responses, a list of financial contributions were put forward for consideration. This list needed to be considered in the context of the site viability, taking account of the fact that the level of contributions requested were much greater than the level of contributions available due to viability constraints.

8.15.4 Shropshire Council are having to accept a reduction in their affordable housing policy, from a fully compliant scheme (20%) to a partially compliant (5%) scheme.

8.15.5 In addition to the on-site affordable housing, the viability assessment makes provision for £16.75million to be achieved through S106 and/or CIL. CIL is currently applicable within Shropshire Council, and is a sum that is calculated

on the creation of new floor area. Unlike a S106, viability of application cannot reduce this calculation, and therefore must be provided without exception. Consideration of these contributions has been under continual review and ongoing discussions between Officers at both Shropshire Council and Telford and Wrekin Council. As the distribution of this sum has been considered, it was also agreed that some of the major infrastructure works, would be provided through 'Grampian conditions' requiring the developer to directly carry out certain highway works rather than through the provision of a financial sum for the local authorities to carry out the works. As such these figures have been deducted from this sum. The required mitigation for this scheme is set out in the table below;

Item	**Agreed Amount**	**Notes**
Education - Primary	£5,100,000.00	To provide a new primary school on site, and for the S106 to require the provision of land for a school
Education – Secondary	£4,400,000.00	Towards an extension of William Brookes
Gaskell Arms Improvements	£250,000.00	Directed to SC
Atcham/Leighton/Buildwas highway improvements	£65,000.00	*Grampian condition*
Castlefields Way Roundabout	£871,200.00	*Grampian condition*
Ironbridge traffic calming improvements	£150,000.00	*Grampian condition*
Buildwas Bank Roundabout	£1,000,000.00	*Grampian condition*
Travel Plan Monitoring	£100,000.00	
Sustainable Transport/Bus Strategy	£1,000,000.00	To include Education transportation requirements
Sports Pavilion & Pitches	£640,000.00	Directed to SC to provide the facilities/pitch upgrades on site.
Severn Valley Way improvements	£550,000.00	Directed to TWC
Severn Way improvements	£200,000.00	Directed to SC
Healthcare	£500,000.00	Directed to the CCG, and a S106

		to require the provision of an on-site serviced plot; in the event this is not required by the CCG can be released
Public Realm – Play/ Recreation	£96,000.00	Directed to TWC to be spent within the WHS
Public Realm - Heritage	£350,000.00	Directed to TWC to be spent within the WHS
Trees	£262,509.12	Directed to TWC to facilitate mitigation and enhancements in proximity of the site
Trees - SGCT	£128,226.00	Directed to SGCT to facilitate mitigation and enhancements in proximity of the site/adjacent woodland.
Neighbourhood Fund	£1,000,000.00	As required by CIL
CIL/ S106 monitoring	£87,064.88	Approx. 0.5% - directed to SC
Provision of Affordable Housing	5%	To be delivered on site, through the S106.
	£16,750,000.00	

8.15.6 We believe that the contributions set out in the table above are appropriate and justified based on the NPPG tests and seek to mitigate against the issues outlined with the report. The primary focus is the impact on highways, education and healthcare but with consideration given to the impacts on the public realm in respect to play/recreation, built heritage, trees and public rights of way.

8.15.7 The contributions will come forward through both CIL and S106; as a cross boundary application where TWC does not have CIL, it is essential that a Memo of understanding between the two authorities, to effectively ring-fence these requirements and ensure the appropriate contributions are directed to mitigation measures of the proposal. Furthermore a robust viability review mechanism linked to phasing / period reviews is also essential and will be built into this S106 and Memo of understanding to address any uplift in viability, and to address factors that have been reduced in particular the delivery of onsite affordable housing.

9 CONCLUSIONS

9.1 At the heart of the NPPF (paragraph 11) is a presumption in favour of sustainable development and (paragraph 117/118) giving substantial weight to the value of using suitable brownfield land; nonetheless it is recognised that the site is located in a very sensitive location at the edge of the World Heritage Site (WHS), and on the border of the administration area. The proposed redevelopment has many environmental factors which have been given thorough consideration during its 18months as a live planning application. The proposal has been worked up from the original submission to give greater recognition to its impacts, working alongside the applicants to achieve a sustainable development which both compliments the local area but seeks to mitigate where necessary. The financial contributions set out below are not to make the site suitable but more so to recognise some of the impacts and seek to mitigate against these and contribute towards the local area where it was deemed necessary. Specifics matters such as Highways, Flooding and the impact on the WHS/OUV which we recognise have been continually raised by residents and interested parties, have been considered at great length and through detailed consideration it is considered that such matters can be appropriately protected and mitigated through appropriately worded conditions.

9.2 On balance therefore, it is considered that the proposal is compliant with the relevant policies of the Telford & Wrekin Local Plan 2011-2031 and represents sustainable development of previously developed land. The proposal, if an appropriate Design Code is followed, will respect and respond positively to the site and the wider area.

9.3 The proposal is therefore deemed to be compliant with the Telford & Wrekin Local Plan 2011-2031 and the guidance contained within the NPPF.

10 DETAILED RECOMMENDATION

10.1 It is recommended that this cross boundary planning application be approved, subject to a Section 106 agreement imposing the planning obligations outlined within 10.3 A below, conditions outlined at 10.3 B below, informatives and, if required, Telford & Wrekin and Shropshire Council entering in to a Memorandum of Understanding relating to the planning obligations, the distribution of CIL contributions and other arrangements (outlined within 10.3 A below) to ensure that the Borough Council receives the appropriate distribution of developer contributions as set out in this report.

10.2 That the Development Management Service Delivery Manager be authorised to negotiate and agree the detailed terms of the Section 106 planning obligations and any Memorandum of Understanding, as outlined at 10.3 A and in this report

10.3 To note that arrangements will need to be entered into whereby the Council would authorise Shropshire Council to issue a planning permission in respect of the determination of this cross-boundary planning application following written confirmation from the Development Management Service Delivery Manager that the permission can be issued and subject to the Section 106 planning obligations and conditions and (if required) a Memorandum of Understanding as agreed by the Development Management Service Delivery Manager, as outlined below and in this report

A)

I. Financial contribution of £5,100,000.00 together with a serviced plot for the provision of an On-site f primary/nursery school;

II. Financial contribution of £4,400,000.00 towards expansion at William Brookes School for 160 pupils;

III. On-site provision of affordable housing (5%);

IV. Financial contribution of £250,000.00 towards improvements at the A4169 Smithfield Road/Victoria Road/Bridgnorth junction (i.e. the Gaskell Arms at Much Wenlock);

V. Travel Plan Monitoring at a cost of £100,000.00

VI. Financial contribution of £1,000,000.00 towards Transport/Bus Strategy (in liaison with Arriva) and to include education transportation requirements;

VII. Financial contribution of £640,000.00 towards provision of Sports Pavilion and Sports pitch upgrades including implementation timetables

VIII. Financial contribution of £550,000.00 towards Severn Valley Way improvements to provide improvements/upgrades to facilitate a multi-use route;

IX. Financial contribution of £200,000.00 towards Severn Way improvements to provide connection to Buildwas (towards Buildwas only);

X. Financial contribution of £500,000.00 towards healthcare

requirements highlighted by the CCG;

XI. On-site serviced plot for healthcare facility;

XII. Financial contribution of £96,000.00 towards Public Realm improvements for Play/Recreation;

XIII. Financial contribution of £350,000.00 towards Public Realm improvements for Heritage;

XIV. Financial contribution of £128,226.00 towards tree management/safety inspections/planting relating to increased pressure/footfall within land under the management of SGCT;

XV. Financial contribution of £262,509.12 towards tree management/safety inspections/planting relating to increased pressure/footfall in the Gorge, in addition to climate change offsetting and biodiversity net gain;

XVI. Financial contribution of £1,000,000.00 towards Buildwas Parish Neighbourhood Fund;

XVII. Financial contribution of £87,064.88 towards S106 Monitoring;

XVIII. On-site serviced plot for potential Park & Ride Facility;

XIX. Implementation timetable for NEAP/LEAP;

B) The following conditions (with authority to finalise conditions and reasons for approval to be delegated to Development Management Service Delivery Manager):-

1. Timescales for first reserved matters application

   and REM principles

2. Commencement timescales

   And, timescales for subsequent reserved matters applications

   And, commencement for subsequent reserved matters applications

3. In accordance with approved plans

4. Design Code

5. Flexibility/Restriction on Use Classes

6. Restriction on number of units and occupancy of retirement village

7. Specific approval of masterplan, sustainable design brief, landscape strategy, framework travel plan and transport

improvements;

8. Method statement for the safety and stability of the pumphouse

   And, a scheme for the repair and reuse of the pumphouse

9. Method statement for the safety and stability of the bridge 170m east of the pump house as a pedestrian route;
10. Foul Drainage
11. Surface Water Drainage and Flood Risk
12. SuDS
13. Highways - External lighting
14. Infrastructure phasing and completion plan
15. Management plan for on-suet construction
16. Construction Access (off Much Wenlock) details
17. Traffic calming at Buildwas, Leighton & Atcham.
18. Buildwas Bank roundabout scheme
19. Buildwas Road Bridge access scheme
20. Travel Plan
21. A4169 north access (T junction) scheme
22. A4169 southern access (roundabout) scheme
23. Internal road construction details
24. Electric vehicle charging points details
25. Castlefields Way roundabout improvements
26. In accordance with public rights of way proposals
27. Construction & Habitat Environmental Management Plan
28. AIA update surveys
29. Trees – retention of strategic tree belts
30. Trees – burning, fencing, root protection etc
31. Ecology – updated surveys, method statements, reasonable avoidance measures, bat and bird boxes, mitigation strategies, connectivity strategies, habitat creation and management, lighting plans, protection of SSSI and ancient woodland, biodiversity net gain

32. Pollution control
33. Contamination Remediation
34. Noise mitigation
35. Ground Stability
36. Piling – details
37. Noise Control - commercial/industrial or fixed plant assessments
38. PFA removal
39. Sports & Recreation provision – design and implementation

APPENDIX 1: SUPPORTING DOCUMENTS:

December 2019 submission:

- Planning Application Forms
- Community Infrastructure Levy Forms
- Site Location Plan (drawing no: 0799-LDA-P1-00-DR-A-20001)
- Illustrative Masterplan (drawing no: 0799-LDA-P1-00-DR-A-08100)
- Illustrative Masterplan – with uses key (drawing no: 0799-LDA-P1-00-DR-A-08101)
- Proposed Site Sections (drawing no: 0799-LDA-P1-SZ-DR-A-08102)
- Proposed Phasing Strategy (drawing no: 0799-LDA-P1-00-DR-A-08103)
- Proposed Visualisation (drawing no: 0799-LDA-P1-LL-DR-A-08104)
- Landscape Strategy Plan (drawing no: P17-1052_15)
- Initial Sustainable Drainage Appraisal by RPS
- Much Wenlock Road (Northern Access) (drawing no: ADC1776-DR-006-P1)
- Much Wenlock Road (Southern Access) (drawing no: ADC1776-DR-006-P4)
- Design and Access Statement by Leonard Design
- Planning Statement by Pegasus Group
- Consultation Statement by Pegasus Group
- Arboricultural Assessment by FPCR

- Lighting Assessment by RPS
- Environmental Statement, (including a Non-Technical Summary) incorporating:
    - Chapter 1 Introduction
    - Chapter 2 Assessment Methodology
    - Chapter 3 Application Site
    - Chapter 4 Proposed Development and Alternatives
        - Built Form Parameters Plan
    - Chapter 5 Socio Economic
    - Chapter 6 Landscape
        - Figure 6.1 Preliminary Zone of Theoretical Visibility
        - Figure 6.2 Site Location and Planning Designations
        - Figure 6.3 Topography
        - Figure 6.4 Landscape Character
        - Figure 6.5 Viewpoint Locations and PROW
        - Figure 6.6 Viewpoint Photographs
        - Figure 6.7A Landscape and Visual Analysis
        - Figure 6.7B Landscape and Visual Analysis
        - Figure 6.7C Landscape and Visual Analysis Site Specific
        - Figure 6.8 Green Infrastructure and Landscape Strategy
    - Chapter 7 Biodiversity
        - Figure 7.1 Consultation Results Plan - Designated Sites
        - Figure 7.2a Consultation Results Plan - Species Records - Mammals
        - Figure 7.2b Consultation Results Plan - Species Records - Notable Invertebrates
        - Figure 7.2c Consultation Results Plan - Species Records - Notable Plants
        - Figure 7.2d Consultation Results Plan - Species Records - Herptiles
        - Figure 7.2e Consultation Results Plan - Species Records - Birds
        - Figure 7.2f Consultation Results Plan - Species Records - Invasive Non-Native Plants
        - Figure 7.3a Shropshire Ecological Network - Core Areas

- Figure 7.3b Shropshire Ecological Network - Corridors
- Figure 7.3c Shropshire Ecological Network - Buffers
    - Figure 7.3d Shropshire Ecological Network - Sustainable Land Use
    - Figure 7.4 GCN European Protected Species Licence Area
    - Figure 7.5 Otter Survey Plan
    - Figure 7.6 Badger Survey Plan
    - Figure 7.7 Breeding Bird Survey Plan - Distribution of Notable Species
    - Figure 7.8 Winter Bird Survey Plan - Distribution of Notable Species
    - Figure 7.9a Habitat Survey Plan (East)
    - Figure 7.9b Habitat Survey Plan (West)
    - Figure 7.10 Invasive, Non-native Plant Plan
    - Figure 7.11 Bat Roost Plan
    - Figure 7.12a Bat Transect Survey Plan - August 2018
    - Figure 7.12b Bat Transect Survey Plan - September 2018
    - Figure 7.12c Bat Transect Survey Plan - October 2018
    - Figure 7.12d Bat Transect Survey Plan - April 2019
    - Figure 7.12e Bat Transect Survey Plan - May 2019
    - Figure 7.12f Bat Transect Survey Plan - June 2019
    - Figure 7.12g Bat Transect Survey Plan - July 2019
    - Figure 7.13 Bat Static Detector Survey Plan
    - Figure 7.14 Effect on the Shropshire Ecological Network
    - Appendix 7.1 Phase 1 Habitat Report
    - Appendix 7.2 Hedgerow Assessment Report
    - Appendix 7.3 Bat Report
    - Appendix 7.4 Breeding Bird Report
    - Appendix 7.5 Wintering Bird Report
    - Appendix 7.6 Barn Owl, Hobby and Red Kite Report
    - Appendix 7.7 Great Crested Newt Report
    - Appendix 7.8 Brown Hare Report

- Chapter 8 Cultural Heritage
  - Appendix 8.1 Built Heritage Assessment
  - Appendix 8.2 Historic England Consultation Response
- Chapter 9 Archaeology
  - Appendix 9.1 Archaeological Desk Based Assessment
  - Chapter 10 Transport
  - Appendix 10.1 Transport Assessment
  - Appendix 10.2 Travel Plans
- Chapter 11 Air Quality
  - Figure 11.1 Construction Phase Dust Study Area and Distance Buffers
  - Figure 11.2 Operational Phase Traffic Emissions Study Area
  - Figure 11.3 Operational Phase Traffic Emissions Existing Receptor Locations - Much Wenlock
  - Figure 11.4 Operational Phase Traffic Emissions Existing Receptor Locations - Ironbridge
  - Figure 11.5 Operational Phase Traffic Emissions Existing Receptor Locations - North of Site
  - Figure 11.6 Operational Phase Traffic Emissions Proposed Receptor Locations
  - Appendix 11.1 Glossary
  - Appendix 11.2 Traffic Data Utilised in the Air Quality Assessment
  - Appendix 11.3 Wind Rose
  - Appendix 11.4 ADMS-Roads Model Verification
  - Appendix 11.5 Operational Phase Road Traffic Emissions Assessment Sensitivity Analysis
  - Appendix 11.6 Construction Phase Dust Assessment
- Chapter 12 Noise and Vibration
  - Figure 12.1 Noise Sensitive Receptors
  - Figure 12.2 Noise Monitoring Locations
  - Figure 12.3 Daytime LAeq,16h road traffic noise contour
  - Appendix 12.1 Glossary
  - Appendix 12.2 Policy

        - Appendix 12.3 Baseline Noise Monitoring Results
        - Appendix 12.4 Third Octave Noise Data from Plant Source Measurements
        - Appendix 12.5 Low frequency noise at nearest existing NSR
    - Chapter 13 Hydrology
        - Appendix 13.1 Flood Risk Assessment
    - Chapter 14 Ground Conditions
        - Appendix 14.1 Prelim Risk Assessment and Ground Investigation Report
        - Appendix 14.2 Landslide Report
        - Appendix 14.3 Geological Report and Mineral Resource Assessment

<u>August 2020 submission:</u>

- Illustrative Masterplan (drawing number: 0799-LDA-P1-00-DR-A-08100_Rev01), supersedes drawing number: 0799-LDA-P1-00-DR-A-08100;
- Illustrative Masterplan – annotated (drawing number: 0799-LDA-P1-00-DR-A-08101_Rev01), supersedes drawing number: 0799-LDA-P1-00-DR-A-08101;
- Much Wenlock Road (Northern Access) (drawing number: ADC1776-DR-006-P2), supersedes drawing number: ADC1776-DR-006-P1;
- Much Wenlock Road (Southern Access) (drawing number: ADC1776-DR-002-P5), supersedes drawing number: ADC1776-DR-002-P5;
- Proposed Phasing Plans (dated 05/08/2020);
- Green Infrastructure and Landscape Strategy Plan (drawing number: P17-1052_15A), supersedes drawing number: P17-1052_15);
    - Landscape Sections (drawing number: P17-1052_20) – new drawing;
    - Public Rights of Way Network (with proposed links and diversions) (drawing number: ADC1776-DR-008_P1);
    - Construction Environmental Management Plan (Provisional) by FPCR (Confidential);
    - Deculverting Technical Note by RPS;
    - Planning Statement (updated) by Pegasus Group, supersedes previously submitted version;
    - Leisure Strategy by Pegasus Group – new document;

- Sustainable Design Brief by Leonard Design – new document;
- Arboricultural Assessment (updated) by FPCR, supersedes previously submitted version;
- Combined Tree Survey Plans by FPCR – new document;
- Combined Tree Retention Plans by FPCR – new document;
- Environmental Statement Addendum, (including a Non-Technical Summary) incorporating:
    - Chapter 1 Introduction (to be read in conjunction with the original ES chapter)
    - Chapter 2 Assessment Methodology (no change)
    - Chapter 3 Application Site (no change)
    - Chapter 4 Proposed Development and Alternatives (no change)
    - Chapter 5 Socio Economic (no change)
    - Chapter 6 Landscape (supersedes the previously submitted version)
        - Figure 6.5A Viewpoint Locations and Public Rights of Way
        - Figure 6.5B Viewpoint Photographs
        - Figure 6.6A Location of Reg 25 Requested Viewpoints
        - Figure 6.6B Reg 25 Viewpoint Photographs
        - Figure 6.8 Green Infrastructure and Landscape Strategy
        - Figure 6.9 Landscape Sections
        - Figure 6.10 Landscape Vignettes
    - Chapter 7 Biodiversity (supersedes the previously submitted version)
        - Figure 7.9a Habitat Survey Plan (East)
        - Figure 7.9b Habitat Survey Plan (West)
        - Figure 7.14a Effect on the Shropshire Ecological Network
        - Figure 7.15a Recreation and Urbanisation Mitigation Strategy – Zone of Potential Recreation Impacts
        - Figure 7.15b Recreation and Urbanisation Mitigation Strategy – ‘within development’ Circular Walks
        - Figure 7.17a Phase 2 Botanical Survey (East)

- Figure 7.17b Phase 2 Botanical Survey (West)
- Figure 7.18a Light and Light Spill Avoidance Mitigation Zone
- Figure 7.18b Light and Light Spill Key Zones for Sensitive Lighting Design
- Figure 7.19 Badger Survey Results (Confidential)
- Figure 7.19a Badger Sett Closures (Confidential)
- Figure 7.19b Retained Created Proposed Badger Sett Closures (Confidential)
- Figure 7.20 Provisional Construction Environmental Management Plan (Confidential)
- Figure 7.21 Air Quality (Ecology) Assessment Scoping Plan
- Figure 7.22 Peregrine Nest Location (Confidential)
- Appendix 7.9 Regulation 25 Response (and Appendices A – E):
- Appendix 7.9A Recreation and Urbanisation Mitigation Strategy
- Appendix 7.9B Phase 2 Botanical Survey
- Appendix 7.9C Peregrine Strategy (Confidential)
- Appendix 7.9D Badger Mitigation Strategy (Confidential)
- Appendix 7.9E Provision CEMP (Confidential)

- Chapter 8 Cultural Heritage (supersedes the previously submitted version)
  - Appendix 8.1 Built Heritage Assessment
- Chapter 9 Archaeology (no change)
- Chapter 10 Transport (supersedes the previously submitted version)
  - Appendix 10.3 Transport Assessment Addendum
- Chapter 11 Air Quality (supersedes the previously submitted version)
  - Appendix 11.1 Glossary
  - Appendix 11.2 Traffic Data Utilised in the Air Quality Assessment

- Appendix 11.3 Wind Rose
- Appendix 11.4 ADMS-Roads Model Verification
- Appendix 11.5 Operational Phase Road Traffic Emissions Assessment Sensitivity Analysis
- Appendix 11.6 Construction Phase Dust Assessment

- Chapter 12 Noise and Vibration (supersedes the previously submitted version)
- Chapter 13 Hydrology (supersedes the previously submitted version)
  - Appendix 13.1a Flood Risk Assessment Addendum
  - Appendix 13.2 Ground Water Monitoring
  - Appendix 13.3 EA Response
  - Appendix 13.4 Drainage Strategy
- Chapter 14 Ground Conditions (supersedes the previously submitted version)
  - Appendix 14.1a Prelim Risk Assessment and Ground Investigation Report
  - Appendix 14.2a Landslide Report
  - Appendix 14.3a Geological Report and Mineral Resource Assessment
  - Appendix 14.4 EA Response Letter
  - Appendix 14.5 Ground Water Monitoring

<u>December 2020 submission:</u>

- Illustrative Masterplan (drawing number: 0799-LDA-P1-00-DR-A-08100_Rev02), supersedes drawing number: 0799-LDA-P1-00-DR-A-08100_Rev01;
- Illustrative Masterplan – annotated (drawing number: 0799-LDA-P1-00-DR-A-08101_Rev02), supersedes drawing number: 0799-LDA-P1-00-DR-A-08101_Rev01;
- Green Infrastructure and Landscape Strategy Plan (drawing number: P17-1052_15A)
- Residential Sections (dated December 2020) by Leonard Design;
- Leisure Strategy (dated December 2020) by Pegasus Group – updated document;

- Heritage Clarification Note (December 2020) by Pegasus Group – new document;
- Combined Tree Retention Plans by FPCR (December 2020) – updated document, supersedes previously submitted plans;
- Landscape and Visual Issues – Response to Further Clarification Request (December 2020) by Pegasus Group – new document;
- Albert Edward Bridge Bat Report (December 2020);
- Technical Note – Outline Biodiversity Impact Assessment (December 2020) by FPCR;
- Technical Note – Great Crested Newt Mitigation Strategy (December 2020) by FPCR;
- Technical Note – General Response (December 2020) by FPCR;
- Preliminary Biodiversity Metric Calculation 2.0 by FPCR;
- Appendix 7.9 Provisional Construction and Environmental Management Plan (CEMP) (Revision B – December 2020) – please note that this document contains sensitive information and should not be placed in the public domain;
- Appendix A Recreation and Urbanisation Mitigation Strategy (Revision B – December 2020);
- Figure 7.20 Construction and Environmental Management Plan (CEMP) (drawing number: 8258-E-MD-35_RevA)– please note that this document contains sensitive information and should not be placed in the public domain;
- Figure 7.23(a-e) SSSI and Ancient Woodland Buffers (drawing numbers: 8258-E-MD-38a-e);
- Figure 7.24(a-b) BIA Calculation Baseline (East and West);
- Figure 7.24a BIA Calculation Baseline (East) (drawing number: 8258-E-MD-39a);
- Figure 7.24b BIA Calculation Baseline (West) (drawing number 8258-E-MD-39b);
- Figure 7.25 Albert Edward Bridge Bat Roost Location Plan (drawing number: 8258-E-MD-40);
- Figure 7.26 Wildlife Connectivity Parameters Plan (drawing reference: 8258-E-MD-41).

APPENDIX 2:
SC Emerging Policy S20 & Inset Map