



29th January 2024

Telford & Wrekin Council
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Rodington Parish Council wishes to raise its objections to the proposals in the Local Plan Review, 2023 with particular objections being raised to the site allocations listed;

- Land West of Rodington (site ID 197)
- Land adjoining Rodington Cemetery (site ID 200)
- Land South of Sunningdale, Rodington Heath (site ID 202)

The grounds for objection to these proposals are as follows:

1. Inadequate highways to support development on this scale
2. Problematic drainage and sewerage system incapable of supporting this scale of development
3. Inadequate infrastructure to support this development.
4. Adverse impact on the environment, and agriculture
5. Consequential impact on the carbon footprint of the area
6. Adverse impact on local ecology and bio diversity

These grounds are further clarified in the following:

1. **The scale** of the proposed housing dwarfs the existing community of Rodington and cannot be considered to meet the requirements of the National Planning Policy Framework for sustainability (NPPF2.7). In particular Rodington lacks significant infrastructure (NPPF 11(A) notwithstanding the score of 11 on Telford and Wrekin's own assessment (ref 5.21 Technical Paper- Rural Settlements Update).

Additionally, 5.52 of that assessment, states in respect of Rodington, **“Planning permission has been granted (vis 2014) for additional housing development. Due to the small and intimate scale of both the settlement and the highways associated with the village it is not considered appropriate for further development other than in the exceptional circumstances....” set out in the NPPF (para 55).**

There has been no assessment of local need to support development on this scale which contradicts current policy on rural development, “The Council will support development in the rural area where it addresses the needs of rural communities.”(TWC Local Plan, SP3, p37)

2. **Highways.** The roads in and around Rodington consist of narrow country lanes, subject to frequent flooding and mud from farming traffic (and run off from the fields). This has a knock-on effect for drainage, and the silting up of existing drains. Housing on the scale proposed would lead to an exponential increase in the volume of traffic. Your site assessments for sites 197, 200 and 202 describe them as having: **“poor accessibility,”** and **“geometric deficiencies with little scope for any real mitigation”** The analysis in those technical papers state that the road network is **“totally unsustainable”** for all 3 sites in Rodington

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and Rodington Heath. They are single track in places and are serviced by 2 ancient singletrack bridges that are already showing the strain of carrying existing traffic. Walcott bridge had to be closed recently for repairs and residents of Longdon-on Tern are constantly voicing concerns about the bridge there. In addition, there are no pavements in Rodington and current proposals present a serious risk to pedestrians, cyclists and horse riders. To remedy these issues would require infrastructure costs that would be beyond the scope and potential of section 106 of the Town and Country Planning Act 1990 or the Community Infrastructure Levy.

3. **Sewerage capacity** - the land around the village is very flat and low-lying, leading to localized flooding in periods of heavy rain. There is often standing water in the fields. Due to the flat nature of the land, the sewerage and foul water drainage is extremely shallow with virtually no fall on the pipes. **The existing drainage system could not sustain an increase in the population as proposed** – there is already sewage back-up and flooding in some parts of Rodington and neighbouring villages due to poor drainage. There are no plans by Severn Trent to address these issues, or to build capacity.
4. **Public transport.** The existing bus service provides limited, infrequent journeys which do not offer access to most of the areas that offer opportunities for employment, such as Hortonwood or Halesfield, and Shrewsbury as predicated in the TW Local Plan (Policy EC1). Therefore, every new household would be obliged to use their own vehicles (if not WFH) which is diametrically opposed to Telford & Wrekin Council's Net Zero policy and aims. Additionally, according to the NPPF, **“Patterns of growth should be actively managed to make fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable** (paragraph 17). This principle cannot be met without substantial and disproportionate investment in an integrated transport system for this area.
5. **Infrastructure and services demand:** While Rodington is a beautiful place to live and work, it is significantly lacking in local services. In the village of Rodington, there is one pub/restaurant and a village hall within walking distance. In order to access any local services, residents currently need to use public transport (which is significantly limited) or have access to a vehicle. Below is a list of services that residents can only access via transportation: Local shops; Dental services; GP; Hospital; Supermarkets; Veterinary; Opticians; Schools; Leisure activities especially for young people, and even more particularly for teenagers.
6. **Medical and dental appointments** are already hard to obtain. GP surgeries at Admaston and Wellington are already oversubscribed and the nearest surgery at Severn Fields Medical Practice, Shrewsbury is already struggling to provide appointments. Your technical paper also points out that it will be necessary to look at the viability of educational provision as there are no obvious options. These are just a few examples of the day-to-day services that are not easily accessible for residents in Rodington, questioning the suitability of these site allocations judged by your own criteria, and identified as essential in the current Joint Strategic Needs Assessment of Telford and Wrekin.
7. **Farming:** The Telford & Wrekin Local Plan states a commitment to safeguarding quality agricultural land; ‘a precious national resource that will increase in importance in reducing “food miles” to mitigate global warming.’ Further proposals are needed to show how this loss could be offset. Therefore, an agricultural land grade assessment is required. These proposals substantially cut across and therefore contravene NPPF 13.137-138.

The Local Plan Review does not value sufficiently the use of farming land, and its contribution to the local economy. Farming is one of the largest employers in this Parish, inclusive of contract work. Farming is also at the heart of food security, and of Telford and Wrekin's local food policy to underpin healthy eating and achieving Carbon Net Zero. All of the sites proposed in Rodington are being proposed on farming land. The Strategic Policies SP1, SP2 and SP3 (Telford, Newport and the Rural Area) were revised to prioritise housing development in rural areas such as Rodington, over the protection of high quality productive agricultural land. We challenge this assumption, and refer to the NPPF (para 137-151) in particular the protection of rural communities from ‘urban sprawl’.

8. **Environment:** Evidence indicates that the carbon footprint of the UK built environment (buildings and infrastructure) based on the most up to date emissions data is responsible for 25% of total UK greenhouse gas emissions (source: UK Green Building Council, Dec 2020, report to Central Government). Emissions from vehicles are likely to be mitigated by Government policy for phasing out diesel and petrol vehicle beyond 2035, but the scale of the proposed building in Rodington would result in an exponential increase

of carbon emissions which is counter to Telford and Wrekin's Policy on Carbon reduction (Net Zero target, 2019 and Climate change and sustainability policy updated report, 24.1.23)

9. **Ecology:** There is an adverse ecological impact in building 338 houses on open farmland. Many of the established hedgerows and trees that surround it would be removed by this development. Indigenous species, some of which are already threatened by diminishing populations could be removed entirely from this area, i.e. Green Finches, Yellow Hammers, Linnets, Willow Warblers, Gold Finches and Yellow Wagtails. Corn buntings and small mammals which rely on the margins of grain producing fields will diminish as a consequence of taking out hundreds of acres of agricultural land. Numerous bat populations would be impacted as well as raptors in the area, including buzzards, kestrels, and several species of owl. Along the margins of fields, species of wild flowers, invertebrates and insects thrive. This plan substantially threatens local bio-diversity.
10. **There are 3 Rights of Way** on the proposed sites and one strategic right of way (Shropshire Way) which would be significantly impacted by the proposed development.
11. **Should all land adjacent to the cemetery** be utilized for housing development, as it is proposed, this would pose a long- term logistical issue which rests with the Parish Council faced with a shortage of burial plots.

12. Summary:

Rodington Parish Council objects to the proposals of these site allocations and requests that they be removed from the Local Plan Review on the grounds of feasibility and sustainability. The plans are wholly disproportionate to the size, scale and characteristics of Rodington. They do not address the needs of the rural community of Rodington (TWCLP, 2023, SP3). Further evaluations would be required to assess this. These proposals have more to do with the ambitious strategic housing growth needs of Telford and Wrekin, rather than centrally directed targets and would have long-term damaging impacts on this rural community. If Telford & Wrekin Council were to approve any of these site allocations it is our view that these proposals would require significant infrastructure demands and add significant cost which neither the authority or developers would have capacity to meet under S106 agreements or the Community Infrastructure Levy. These could not be addressed prior to any developments taking place and would breach Telford & Wrekin Council's existing Planning Policies referred to in this submission, together with the National Planning Policy Framework, 2023.

Best wishes



Mr C Furnival

For and on behalf of Rodington Parish Council