



Shropshire
Wildlife Trust

Response to the Regulation 19' Pre-Submission Draft of the Shropshire Local Plan Consultation

Shropshire Wildlife Trust
Conservation Officer: Evidence & Data
193 Abbey Foregate, Shrewsbury
SY2 6AH
Email:

Summary

While the draft plan may be an improvement on previous versions Shropshire Wildlife Trust believes it falls woefully short of what is needed to make development truly sustainable and address the Ecological and Climate Change Crisis. It is in effect the 'business as usual' scenario, we need to move beyond this to achieve a sustainable future.

The draft plan lacks ambition and policy wording is weak, a combination that is unlikely to deliver the biodiversity gains and carbon reductions that are needed.

There is not a balanced approach to sustainability as economic growth is given priority. This is reflected in the pursuit of higher levels of growth than are actually needed. In turn, this places significant pressures on towns and villages in the county that cannot sustainably accommodate the housing and employment allocations forced upon them.

Main concerns:

- There is a lack of reference to the 25 Year Plan for the Environment, the Environment Bill, and Nature Recovery Networks
- Support in the plan for the North West Relief Road and HS2 - both environmentally damaging schemes that the Wildlife Trust has major concerns with.
- The plan is unambitious with its target of increasing land for biodiversity by 10% - the Wildlife Trusts' believe that 30% of the land should be under recovery for biodiversity by 2030.
- Biased towards the social and economic benefits of development over and above the environmental negatives
- Inconsiderate of accessible local natural green space for people
- Underwhelming solutions to the Ecological and Climate Change Crisis
- Development where a release of greenbelt would cause moderate or above risk of harm is unacceptable.
- Settlement policies only make up a small proportion of housing allocations; we are concerned by the areas of windfall sites and the impact these may have.

Comments on Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038

Part	Agree/Disagree	Comments
Para 2.20	Disagree	There is reference to strategies, some still in draft format, but no reference to Local Nature Recovery Strategy. Given the contribution of transport to Climate Change we have particular concerns relating to the absence of an up to date and adopted Local Transport Plan.
Para 2.21	Mixed	We welcome the recognition of the need to respond to the Climate Emergency, and the aim to achieve sustainable development. There is an Ecological and Climate Emergency; this weighting should be duly considered in the 'full balance of considerations'.
Para 2.31	Disagree	There is an Ecological and Climate Emergency; moving towards a zero-carbon economy should be occurring now to be ideally be achieved by 2038. We would suggest rewording along the following lines: 'as Shropshire moves towards completing its progress to a zero-carbon economy'.
Policy SP1 (2)	Disagree	Proposals should also cross reference the forthcoming Nature Recovery Strategy, and the Climate Strategy.
Policy SP2 (2)	Disagree	While we accept the general Strategic Approach, we question the scale of development, both housing and employment land. Shropshire Wildlife Trust, and the majority of others, have expressed concerns relating to the high level of growth in previous consultations. The insistence on pursuing a level of housing in excess of housing need is not a sustainable approach and reflects the focus on economic growth. This is contrary to section 2 of the NPPF which states that the three overarching objectives of sustainable development (economic, social and environmental) need to be "pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)". This concern filters down to the various place plan areas and sites all of which are placed under additional pressure to deliver housing beyond the overall level of need.
Policy SP2 (5b)	Disagree	Not all Principal and Key Centres are equal in their ability to accommodate sustainable growth.
Para 3.17		The purpose of the local plan is surely to achieve sustainable development not to achieve the aspirations of the Economic Growth Strategy.
Para 3.28 (b)	Disagree	We question the ability for this strategic corridor to deliver true sustainable economic growth.
Para 3.28(d)	Disagree	The Wildlife Trusts oppose HS2 at a national level as the environmental costs outweigh any benefits. The identification of a strategic corridor linking to HS2 that is based solely on road transport is an example of the unsustainable results of the scheme and Shropshire Wildlife Trust does not welcome its mention in the Local Plan.
Para 3.28 (e)	Disagree	We question the ability for this strategic corridor to deliver true sustainable economic growth.
Policy SP3	Disagree	Whilst we welcome the inclusion of a specific Climate Change policy, we feel it needs to be much stronger. For example, "Climate Emergency" would be a better policy title reflecting Shropshire Council's declaration.
Policy SP3 (1e)	Disagree	Weak wording, change "encourage" to "ensure".
Policy SP3 (1f)	Disagree	The wording is weak as electric charging infrastructure should be provided in all new development.
Policy SP3 (2a)	Disagree	More clarity is needed on what is meant by 'renewable and low carbon energy systems'.
Policy SP3 (3a)	Disagree	Weak wording, there should be more than 'encouragement'.
Policy SP3 (3b)	Disagree	There should be a requirement to restore habitats with potential for significant carbon sequestration and storage potential, including wetlands, peatland, and soils.

Policy SP3 (4c)	Disagree	“Supporting” should be “requiring”, as per Biodiversity Net Gain as a minimum.
Policy SP4	Disagree	This strategic policy is not a robust interpretation of the NPPF definition of sustainable development which is: “development which meets the needs of the present without compromising the ability of future generations to meet their own needs”. Throughout the plan the term “sustainable” is used without adequate consideration of environmental implications. This is also true for the sustainability appraisals – see later comments.
Policy SP5	Disagree	This could be strengthened by the additional guidance: “should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage”. High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.
Policy SP6	Agree	We welcome this policy.
Policy SP6 (2)	Disagree	It is well-established that access to natural greenspace is beneficial for health and well-being. We feel high quality accessible greenspace should be included in ‘external space standards’.
Policy SP6 (7)	Disagree	Weak wording. In addition to promotion, the provision of walking and cycling routes and infrastructure should be included in development. There should be reference to accessible natural greenspace here, beyond open space, following procedures of what is accessible, and to ensure space is of benefit to wildlife too. There should be a defined ‘walking distance’, e.g. NE Access to Natural Greenspace standard.
Policy SP6 (5b)		A hierarchy of action is required, with ‘enhance’ as a high priority. There should also be recognition of the value of ‘natural play’ and the need to enhance, retain and protect areas where this can occur.
Policy SP6 (7)	Disagree	Should include the promotion of local food supply, in the form of allotments/garden space/farmers markets.
Policy SP6 (8)		Focus should be on nature-based solutions, i.e. tree planting, to achieve this.
Policy SP10 (5b)	Agree	Improved digital connectivity can reduce the need for additional infrastructure and reduce the need to travel.
Policy SP11	Disagree	Our concerns relate to the loss of green belt. Given the green belt review and classification of green belt areas, we find it unacceptable to develop (or ‘safeguard’) where a release of greenbelt would cause a moderate or above risk of harm.
Policy SP11 (3b)	Disagree	This should be removed. Should explicitly state that no greenbelt should be released if this would cause a moderate or above risk of harm.
Para 3.108		Mitigation of land taken out of the green belt should follow BNG principles.
SP13 Para 3.134	Disagree	There is a contradiction within a single sentence. Development should “respond positively” but then refers to environmental assets as “constraints”. Further definition on the meaning of a ‘positive response’ is needed. This should include as a minimum actively enhancing biodiversity, as required by the NPPF, and supported by the Nature Recovery Strategy and Biodiversity Net Gain.
Policy SP14	Disagree	We would like to see an explicit preference for rail connectivity. We feel there is still too much weight afforded to road corridors. See comments for DP9.
Policy SP14 (2)		Wildlife sites are affected more by transport than just ‘atmospheric emissions’, i.e., run-off and pollutants. These negative impacts need to be considered, prevented, reduced, and mitigated for.
Policy SP14 (4a)		To achieve a ‘sustainable pattern of development’, balance is needed between the delivery of housing, employment, AND environmental growth. It is not sustainable if the environment is not considered on an equal footing as the other two.
Para 3.142		We question the ability for A5 west corridor, A41 corridor, and A49 corridor to provide true sustainable growth.

		The Wildlife Trusts oppose HS2 at a national level as the environmental costs outweigh any benefits
Para 3.144	Disagree	The wording refers to 'environment constraints'. These are not constraints, but assets, and should not be referred to in this negative connotation. We are dubious of the inclusion of a reference to development being supported under 'very special circumstances'.
Policy SP15		What constitutes an 'Estate'; how small or large an enterprise? 'Estates' have great potential to contribute to Nature Recovery Networks and so there should be reference to the forthcoming Nature Recovery Strategy.
Para 3.159		Restoration and aftercare of mineral sites should follow Biodiversity Net Gain principles as a minimum.
SP17 Para 3.161		We welcome reference to the government's 25 Year Environment Plan but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.
Para 3.164		Planning policy should encourage and enable the reduction of waste akin to the waste management hierarchy. This policy seems to accommodate 'inevitable' increase in waste.
Policies DP3 - 7		There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.
Policy DP9 Para 4.91		We would like to see a preference for strategic corridors to focus on rail. See comments on 3.26 b, d & e.
Para 4.93		Replace "should" with "must".
Para 4.94		Replace "should" with "must".
Policy DP9		We support town centre development proposals which promote ethical, sustainable, and low-carbon consumer opportunities.
Policy DP10		Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer.
Policy DP10 (f)		The natural environment has been recognised as the major draw for tourists to the county. Retaining and enhancing natural features is therefore key to the long-term success of the tourism industry. Stronger wording is recommended.
Policy DP11		Shropshire Wildlife Trust welcome this policy but feel that it needs both greater ambition and strength.
Policy DP11 (1c)		We welcome this but we would like to see a commitment to an increased level of on-site renewable energy sources.
Policy DP11 (2)		We believe large commercial/industrial developments must have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources. See comment on 3.134. We believe that only the BREEAM assessment should be used as this is the leading assessment tool available.
Policy DP11 (4)		Disappointing that when reducing carbon emissions and addressing climate change is balanced against profit, profit wins.
Policy DP12 (3)		The ambition of 10% gain for nature is not ambitious enough; both the Wildlife Trusts and the UN have identified a need for 30% of land to be protected and in recovery for nature. Government proposals are for at least 10% gain, why are we only looking at the minimum figure? The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.
Policy DP13 (4)		Add areas within any future Nature Recovery Network to the list to be assessed.
Policy DP13 (5)		Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed should be refused.

		Exceptions should only be made in the most exceptional circumstances and there would need to be a clear methodology for how you compare the value of a natural asset to economic or social benefit.
Policy DP13 (7)		The 'bigger' element of the Lawton principle is missing here. Policies should seek to maximise the size of environmental assets.
Policy DP13 (8)		We would like to see reference to the Marches Woodland Strategy.
Policy DP13 (8c & 8e)		We would like to see greater emphasis on protecting existing trees/woodland/hedgerow assets. Using phrases such as 'overriding reasons/benefits for development to proceed' is unclear and will result in the loss of existing trees and hedgerows. Replace hedgerows with hedgerows at least as diverse, or ideally more, in conjunction with biodiversity enhancement and gain.
Para 4.116		Both priority habitats and species, as outlined by Natural England should be added to the list of triggers for assessment.
Para 4.121		There is a high level of subjectivity and scope for how biodiversity net gain will be determined. For most schemes the Local Authority ecologists will be able to determine biodiversity net gain however, in some circumstances partner organisations, such as Natural England and SWT, should be consulted. We would assume the biodiversity net gain assessments will be done using the latest Defra metric. We feel there needs to be explicit mention of how biodiversity net gain will be monitored and assessed to ensure long-term net gain is delivered.
Para 4.123		We understand that the Nature Recovery Network under the Local Nature Strategy will be superseding the SEN. We would like this to be clear in this wording.
Para 4.124		How are public benefits and the value of effected assets going to be measured and assessed against each other?
Para 4.133 (c)		Include reference to biodiversity net gain as part of compensation measures.
Para 4.127		Whether on or off-site mitigation/compensation is proposed, the measures need to be delivered in a timely manner in accordance with biodiversity net gain principle (CIEEM). We view a 'timely manner' to be measure in place prior to the loss of assets. This gives us particular concern in 4.137 where the delivery of measures is unclear.
Para 4.128		It should be made clear that this is very much an option of last resort. Given both best practice and the current state of the natural environment
Para 4.132		We would like to see greater emphasis on protecting existing trees/woodland/hedgerow assets. Using phrases such as 'overriding reasons/benefits for development to proceed' is unclear and will result in the loss of existing trees and hedgerows. Replace hedgerows with hedgerows at least as diverse, or ideally more, in conjunction with biodiversity enhancement and gain.
Policy DP13	Agree	We welcome this policy and would not like to see it compromised in any way.
Policy DP14	Agree	We welcome this policy and would not like to see it compromised in any way.
Policy DP14 (4)		Green space should be managed and maintained for at least the lifetime of any development.
Para 4.144		We would question the infeasibility of producing a green infrastructure opportunity map. If this is purely due to a lack of resources, partnership with other organisations should be explored to develop a map. In the NPPF paragraph 174, it is suggested that maps are needed for restoration/creation areas.
Para 4.148		We feel that both quality and quantity are important and perhaps need to be considered more equally.

Policy DP16		Species for landscaping should be of local provenance wherever possible, unless there are other environmental justifications. Landscaping opportunities afforded by green roofs and facades should be encouraged.
Policy DP18		We welcome this policy and hope it will address some of our concerns about the number of intensive livestock unit developments in the county. SACs, other than the River Clun, and the majority of sensitive habitats are beyond critical thresholds.
Policy DP18 (4)		We welcome greater protection for the county's best agricultural land. Additional consideration should also be given to peatland areas where development should be further resisted to prevent the loss of future opportunities for restoration, biodiversity gain and carbon sequestration.
Policy DP19 (3)		Proposals with any potential to effect water quality in Source Protection Zone 1 should be refused.
Policy DP19 (6)		We would like to see an explicit hierarchy of measures, with management the highest priority and compensation the lowest.
Policy DP19 (6 & 7)	Agree	We welcome the aims to conserve, enhance, and restore river course and riverside habitats.
Policy DP20 (1)		We would consider building regulations to be a minimum and thus proposals that don't meet these should be refused.
Policy DP20 (2)	Disagree	BREEAM status has 5 categories, with 'good' being the second worst classification – this is not ambitious enough.
Policy DP21 (7c)		How can this be achieved?
Policy DP22 (12)	Agree	We welcome this policy.
Para 4.190		A potential failure of the Sequential Test is that it just gives the 'least bad' option, highlighted by the fact that some of the allocated sites are in flood zone 2/3.
Policy DP23 (1)	Disagree	Weak wording - Remove 'wherever possible'
Para 4.226		Local strategic highway improvements should be aimed at improving provision of public transport, walking and cycling.
Policy DP26	Agree	We welcome this policy.
Policy DP27		We welcome this to help us move away from less sustainable practices (reducing need to travel, etc.).
Policy DP28 (2 & 3 d, e & g)		We agree we should respond positively to the climate problems, but we feel the focus on unsustainable transport should be reconsidered. For example, DP28,3 d, e & g still promotes road and other unsuitable transport links, i.e. HS2. There is now explicit support of the NWRR which we do not support.
Para 4.257		The NWRR would be contrary to a number of policies in the plan including, SP3, DP1, DP5, DP15, DP16, DP17, DP18, DP20, DP23, DP24. The inclusion and support of the NWRR in the draft local plan compromises any attempt at sustainability or of addressing the climate and ecological emergency.
Policy DP31 (4)		There is no justification for the winning and working of coal when we are facing a Climate Emergency.
Para 4.274		Mineral aftercare potential should follow Biodiversity Net Gain principles.

Settlement Policies

- We would like to see more regard for the Shropshire Environment Network (SEN), both in terms of limiting impacts on priority habitat areas (core areas of SEN), in addition to identifying areas for biodiversity enhancement and net gain (restoration areas of SEN). Future allocation should reference the Nature Recovery map when it becomes available, in the same way as suggested.
- As well as mitigation for impacts on SACs, we would like to see impacts on local wildlife sites, SWT reserves, and national and local nature reserves be accounted for.

- Strengthen wording wherever 'where possible' is used.
- Settlement policies only make up a small proportion of housing allocations; we are concerned by the areas of windfall sites and the impact these may have.
- We are concerned about firstly, the proximity of the following settlement policies to SSSIs, and secondly, the lack of mitigation measures mentioned in the plan:
 - Saved mineral site near Colemere Wood Lane
 - CLV012/018
 - PH004
 - SHR173
 - MIN007

Comments on Sustainability Appraisal and Site Assessment

Shropshire Wildlife Trust has no confidence in the Sustainability Appraisal (SA) which fails to, in its own words:

- consider how a plan contributes to improvements in environmental, social and economic conditions
- identify any significant adverse effects that a plan might have
- amend proposals in a plan to avoid any significant adverse effects
- propose mitigation measures to counter any remaining significant adverse effects

There appears to have been little done to address the concerns flagged up by many during previous consultations.

To produce a SA that appears to state that the delivery of 30,800 new dwellings and around 300 hectares of employment land with all the associated infrastructure will have no significant negative effects is incredible. The layout of the document is very confusing and hard to follow so it has proved impossible to give comments on particular sections as paragraph numbering is sporadic.

Amendments to the SA site assessment methodology are insufficient and to address the key issue of climate change by assessing whether a bus stop is within 480m gives an indication of the scale of the problem. While we have been unable to check the assessment of every site we do note fundamental scoring errors in the assessments. For example, SHR173; although the presence of an adjacent Local Wildlife Site and nearby SSSI are mentioned in various sections of text they are not counted in the assessment matrix. Also, rather strangely the site scores well in terms of the climate change assessment (bus stop within 480m) despite the issue of the number of car journeys being generated being of such a scale that the development would be dependent on the proposed NWRR to accommodate the additional traffic.

We suggest that the Sustainability Appraisal is subject to a thorough review and rewrite.

Comments on Habitats Regulations Assessment

Despite passing stage 2 of the HRA, we would question this assessment of Hencott Pool and the decision that the increased buffer (now over 200m) between the proposed North West Relief Road and the site is sufficient to determine that there will be no significant impacts. The construction of a major road within 200m of a site of international importance surely raises some uncertainty as to the significance of impacts. Within this assessment the possibility of windfall development (the potential for this is identified in para 5.224 of the local plan consultation document) should also be considered.