

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Oswestry and District Civic Society
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|--|---|
| A. Legally compliant | Yes: <input checked="" type="checkbox"/> | No: <input type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input checked="" type="checkbox"/> | No: <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached submission	1 Document "Ojection to Policy SP2; 2 Presentation "Oswestry 2050"
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(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1 Development in rural areas should be limited to that necessary to meet the needs of the rural areas.
- 2 A development pattern should be developed which is compatible with the need to "move positively towards a zero carbon economy" as set out in the Plan's Spatial vision. For Oswestry/A5 corridor this should start with the principles set out in the Civic Society's "Oswestry 2050" of a low carbon, public transport and active travel based settlement.

(Please continue on a separate sheet if necessary)

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Signature:

David Ward

Date:

01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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Please see attached submission - 1 Document "Ojection to Policy S14"

(Please continue on a separate sheet if necessary)

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The deletion of identification of Hub and Cluster Settlements within Policy S14, as set out in the attached document, consistent with the amendmenst sought to Policy SP2

(Please continue on a separate sheet if necessary)

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It is considered that the Strategy represented by Policy SP2 is unsound, for the reasons given in the Objection to Policy SP2. The Strategy is supported by the Sustainability Appraisal. This objection demonstrates that the Appraisal is of faulty in relation to development in Hubs and Clusters, and cannot therefore support the strategy; and that an adequate Appraisal would have demonstrated that development in these areas would not be sustainable.

(Please continue on a separate sheet if necessary)

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The adoption of a Strategy which is compliant with Government Policy for a move to a low carbon economy.

(Please continue on a separate sheet if necessary)

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OSWESTRY AND DISTRICT CIVIC SOCIETY

Local Plan Review Regulation 19 Submission Policy S14.1

OBJECTION

2/1/2021



Objection to Policy S14

1. The Civic Society has consistently objected to the plan's distribution of development, on the basis that it could not properly reflect the need to move to a low carbon economy, as reflected in the NPPF (as current at the time of Strategy development)) and now the NPPF and additional National policies and International treaties. This is set out in the objection to policy SP2, which sets a strategic approach, in which SP2.6 sets a policy for rural development.
2. So far as the Society's area of interest is concerned, the objection to the strategy reflects in an objection to the allocation of development to specific settlements. In recognition of the need to ensure adequate provision is made for development, and because the Society could see that there was a more sustainable means of accommodating development, the Society proposed Oswestry 2050. This requires an appropriate degree of vision, and based upon the strengths of the area, in terms of its employment centre and transport connections, and, vitally, provides the conditions under which effective and economic public transport and conditions for active travel can be provided, and the reliance on the private car (with its embedded carbon emissions) reduced.
3. Policy S14 sets out the policies for the Oswestry Place Plan Area. In Section 2 of Policy 14.1, the lpa uses Oswestry 2050 as a justification for development at Park Hall, said to be the nucleus of a Garden Settlement envisaged by Oswestry 2050. This is a distortion of the facts for the lpa's own purposes. It is true that the Society, as an example, proposed village settlements within an enlarged Oswestry. The example was a part of a wider example of what could be the result of a strategic planning exercise.
4. Whilst Oswestry 2050 developed a land use example, it could only be that, since the Society is not equipped to carry out a formal site selection process – for instance some land may be subject to flooding, other, such as at Park Hall, contains buried explosives. Oswestry 2050 is a plea for the lpa to apply some vision to produce a land use and transport plan for

the A5 corridor, a process of which they continually fail to appreciate the value. The Society could see, by applying professional expertise, that the concentration of development would permit the use of new (but not fanciful) public transport technology there could be a markedly more efficient, sustainable and socially effective settlement.

5. This builds upon a local appreciation of the need for a changed approach. As instances, Oswestry Town Council has brought in Rapid Charge points for EV's, such that Oswestry has the greatest concentration of EV rapid chargers in any of the Marches counties. Oswestry was also the origin point of Extinction Rebellion (XR) for the Borders. The Civic Society has played an active part of the production of Zero Carbon Shropshire – the second only County Zero Carbon Plan in the UK. Oswestry 2050 has the support, by resolution, of the two main Parish Councils – Oswestry Town, and Selattyn and Gobowen.
6. So, whilst it may seem churlish to object to the Society being mentioned in the plan, it is false to imply any support from the Society for the development land allocated in the plan at Park Hall. This allocation means nothing without the accompanying commitment to settlement wide concentration of development around an attractive, frequent and economic public transport system and active travel network.
7. The submission made at the time of site selection is attached. It lists the settlements in which future development is being proposed in the plan, together with the reasons for objection. Slight changes in numbers of dwellings have been made in the latest version of the plan, and these are shown in the submission. The principles are not altered.
8. The details of Oswestry 2050 are attached to the objection to policy SP2.
9. Commentary on the sustainability assessment for hubs and clusters is the subject of a further objection.

Objection to the selection of preferred sites

Policy:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective

b) a social objective.....

and c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

NPPF 2018 paragraph 8

The Preferred Sites Submission.

Oswestry and District Civic Society

Submission objecting to preferred sites within the Oswestry Place Plan Area

1. This submission should be read with the earlier submission a) objecting to all Strategic Distribution Options dated 11 March 2017, (attached as Appendix 1.; and b) to the Preferred Scale and Distribution of Development, dated 1 December 2017, attached as Appendix 2.) – not attached to Reg 19 submission.
2. Appendix 1 sets out the status of the Civic Society, and concludes that:
 - I. Strategies which allow for more rural development than necessary to meet local need to serve local employment do not comply with policies requiring development to be sustainable.
 - II. All options in the draft Strategy imply significant development in rural areas, beyond that required to meet local need, and are therefore all contrary to Government Policy, and cannot be supported.
3. Appendix 2 concludes, in relation to development outside urban areas, first that the Sustainability Appraisal is of very poor quality, and cannot be taken to support the Strategy it purports to appraise; that development in Hubs and Clusters has not been shown by any evidence to be sustainable; and further, what evidence there is shows that development in these rural settlements is unsustainable.

NPPF revision 2018

4. The NPPF on which the Society's earlier objections were based has been revised. There are differences in emphasis, but nowhere is the link between planning and a low carbon future broken. The Society contends that its earlier objections remain valid.

Background

5. The basis of the preceding submissions was that a consistent element of sustainable development is the need to move to a low carbon economy. The need to address carbon emissions is a responsibility which cannot be escaped, and must be addressed in order to safeguard the future of civilisations, mankind and the natural world. The Society takes the view that this issue is such that the need to address it outweighs all other considerations; and that it is of critical and urgent importance.

Every nation and all sectors of society, and every individual must play a part, however small that might be. Thus the issue should be addressed by planning policy, such as those being developed in the Local Plan Review.

6. The Society's view that the Review fails to adequately address the need to move towards a low carbon economy is set out in the initial objection to the Strategy. The Local Planning Authority has not responded to that objection by any alteration to the Strategy, and the results of that are shown in the allocation of development to rural settlements throughout the area of interest to the Society, and without doubt throughout the area of the Local Plan Review.
7. This objection therefore applies the Society's earlier objections to the detailed site allocations proposed in the Review. Before embarking upon the analysis of the site allocations, there are three further considerations relevant to the Society's case.

The trend in Carbon emissions

8. At the time of writing the COP24 congress is concluding in Katowice, Poland. The UK is one of the signatories to the Paris Climate Accord, and supports the conclusions of the IPCC Special Report, the burden of which was that "urgent and unprecedented changes are needed to reach the target, (to limit temperature rises to 1.5 – 2.0C) which is affordable and feasible although it lies at the most ambitious end of the Paris agreement".
9. For the UK The first carbon budget (2008-12) has been met and the UK is currently on track to outperform the second (2013-17) and third (2018-22) carbon budgets, but is not on track to meet the fourth, which covers the period 2023-27. Meeting future carbon budgets and the UK's 2050 target to reduce emissions by at least 80% of 1990 levels will require reducing domestic emissions by at least 3% per year. This will require existing progress to be supplemented by more challenging measures.¹
10. Some striking evidence arises from the recent progress report to Parliament from the CCC. GHG² emissions from transport are not falling, whereas those from every other sector are. These emissions account for 27% of domestic GHG emissions³. Furthermore, research commissioned by the CCC highlights the reduced propensity of young people to travel, and emphasises the potential for shifts to public transport and cycling to replace car use where better access to these is available and where

¹ <https://www.theccc.org.uk/tackling-climate-change/reducing-carbon-emissions/how-the-uk-is-progressing/>

² Green House Gas

³ <https://www.theccc.org.uk/wp-content/uploads/2018/06/CCC-2018-Progress-Report-to-Parliament.pdf> p150

the urban area is dense enough that work opportunities, shops and leisure activities are all short distances away.

11. From this evidence one would conclude that the move to a low carbon economy is urgent, and that there should be concentrations on the factors driving transport emissions. To be sustainably located, residential development must be well located to effective services, and in locations where it can be served by effective public transport and cycle routes⁴.

Policy CS4; CS1 Rural rebalance and hubs and clusters (Policy CS4, CS1 of the Core Strategy)

12. The Society recognises that the allocation of some 27% of development to rural settlements is in line with strategic policy contained in the development plan. However, it is the Society's view that it is not possible to discern the slightest response to the growing urgency of GHG reductions within the policies of the Local Planning Authority. They have long been questioned by the Civic Society, and it is the Society's view that the increasing urgency (see 7, 8 above) in achieving a low carbon society renders the policy of rural rebalance out of date. Furthermore, the policy has now been in operation for almost a decade. No monitoring of its effectiveness appears to have taken place, and the Sustainability Appraisal of development in hubs and clusters carried out in the context of the Local Plan Review has been shown to be lacking in a suitable evidence base, and of little value.

Oswestry 2050

13. In January 2018 the Society made a public presentation under the heading "Oswestry 2050". This presented a case for longer term strategic approach to the planning of the A5 corridor identified for growth by the Local Planning Authority. The fundamental points were that:
 - I. The development of the Corridor should be the subject of an addition to the Statutory Development Plan;
 - II. There should be a timescale for this addition
 - III. Development should be concentrated in the Corridor, and should not take place in surrounding Hubs and Clusters.
 - IV. The growth in the corridor would be to a total of about 36,000 population by the mid 2000s, in line with the rate of change in the Place Plan, carried forward to 2050
 - V. Development should be closely allied to, and make provision for innovative public transport linking Oswestry and the main line railway at Gobowen.

⁴ The emphasis on effective provision is important. An hourly bus service to a local centre is not "effective". A local village shop is not normally "effective". Consideration must always be given to the most effective way of pursuing a low carbon solution.

- VI. Development should be closely allied to, and make provision for attractive cycle routes
 - VII. It would be likely that the development of such a plan would result in satellite villages at Park Hall and Middleton. The plan should envisage these areas growing as identifiable communities, with their own centres and community assets.
 - VIII. It would be a possibility that such a plan would require, and make the case for, a diversion of the A5 beyond the urban area, in line with present Shropshire Council policy.
 - IX. Development should foster and require innovation, particularly in the field of low carbon development
 - X. The Development Plan should include safeguarding of the setting of the Hill Fort, a Scheduled AM.
14. The Society's view is supported by Oswestry Town Council and Sellattyn and Gobowen Parish Council, both by formal resolution.

Principles of the Objection Applied to the Local Plan Review

1 – Oswestry 2050

15. The Society notes that its work has been recognised in the drafting of the LPR, and in particular that the LPA proposes to *“deliver the majority of new housing required by responding positively to the principles outlined by the Oswestry (and District) Civic Society in its proposed Oswestry 2050”*⁵.
16. The Society would respectfully point out that the principles of Oswestry 2050 can only be delivered by taking them through the process of Statutory Development Planning, and this recognition is absent from the Local Plan Review. Oswestry 2050 cannot be transferred directly to any part of the Development Plan, since it is not based upon the range of evidence required of a development plan. No part of it has been the subject of formal public consultation, nor has it been the subject of an evidence based Sustainability Appraisal. It is simply a product of qualified and experienced professionals making judgements on a voluntary basis, but without the ability to call on wider evidence or seek opinions from stakeholders. Discussions are being held with the LPA officers to bring the Society closer to the Planning Authority in this regard. For the time being the following objection is made: **The Review is deficient in failing to bring forward a commitment by the Planning Authority to**

⁵ LPR para 17.16

include, within a specified timescale, a Development Plan for a long term strategic approach to low carbon development in the A5 corridor.

Specific Land Use Allocations within the Oswestry Place Plan Area

17. In accordance with paragraphs 2 and 3 above, the Society Objects to the allocations within the Place Plan Area, set out in paragraph 20 below. As a preamble, the Society makes observations on the support of local services and local need.
18. The LPR repeatedly maintains that development in Hubs and Clusters will support local services. This mantra has been held to by the Local Planning Authority as a reason for its policies of Rural Rebalance. These policies have now been in operation for a decade, and it would be expected that there would now be a strong base of evidence to support this assertion. No monitoring of this policy has been undertaken; there is no evidence published, and the claim is merely assertion. In the Society's view development in Hubs and Clusters is principally of a dormitory nature. Any evidence which the LPA can refer to which underlines its approach would of course be looked at fairly.
19. Whilst the LPR constantly refers to local need in relation to hubs and clusters, there is no definition of the term, and there is no published document setting out an assessment of the need local to each rural community. In the Society's view a "local need" is for residence which is required in order that the community can continue to function into the future, and provide a range of housing appropriate to those who need to remain in the community to work in local enterprises or services. A need which can equally well be met within the A5 corridor should be met there, for social and accessibility benefits. It is not appropriate to provide "affordable" dwellings in locations which can only be reasonably served by private car, since in many cases this fosters social isolation.
20. Specific Settlement based proposals (present figures appended, from pp346/7, including windfall)
 - I. Gobowen – Additional 119 (now 41) dwellings to be allocated. The Society considers these dwellings to be located in a position which would, subject to the development of an integrated transport system for the A5 corridor, foster moves towards a low carbon economy.
 - II. Kinnerley – Additional 23(21) Dwellings to be allocated. Whilst Kinnerley has a shop, primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.

There is a rudimentary bus service. There are no significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 11km distant. Secondary schooling is likewise 11km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.

- III. Knockin – Additional 31(30) dwellings to be allocated. Knockin has no primary school or other facilities. There is no evidence that any support which further development might bring might be effective in maintaining the village hall. The settlement is not sustainable. There is a rudimentary bus service and a shop. There are no significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 9km distant. Secondary schooling is likewise 10km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.
- IV. Llanymynech Additional 51 (50) dwellings to be allocated. Whilst Llanymynech has shops, access to a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. There is a rudimentary bus service. There are few significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 10km distant. Secondary schooling is likewise 9km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.
- V. Pant – Additional 52 (37) dwellings to be allocated. Whilst Pant has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. There is a rudimentary bus service. There are no significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 9km distant. Secondary schooling is likewise 8km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.
- VI. Ruyton XI Towns – Additonal 103 (101) dwellings. Whilst Ruyton has a shop, a primary school and other facilities, there is no evidence that these are in

need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. There is a rudimentary bus service. There are few significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 15km distant. Secondary schooling is conveniently located at the Corbett Academy, Baschurch. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. The site allocated is a brownfield site, but it is distant from main services. Development should be limited to local need.

- VII. St Martins – Additional 136 (131) dwellings. St Martins is a community with a high level of services, including local employment and a major store. The Society does not object in principle to further development in this location, although it would expect to see an evidence based assessment of the likely travel patterns arising from further development.
- VIII. Trefonen – additional 50 (50) dwellings. Whilst Trefonen has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. There is a poor and rudimentary bus service. There are no significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 6 km distant. Secondary schooling is likewise 6km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.
- IX. West Felton – additional 64 (66) dwellings. Whilst West Felton has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. There is a rudimentary bus service. There are no significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 7km distant. Secondary schooling is likewise 8km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.

-
- X. Weston Rhyn – 101 (100) dwellings to be allocated Whilst Weston Rhyn has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. There is an hourly bus service. There are no significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 8km distant. Secondary schooling is likewise 9km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.
- XI. Whittington – 89 (85) dwellings to be allocated Whilst Whittington has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. There is a rudimentary bus service. There are no significant employment opportunities in the Parish and main shopping and other services are in Oswestry, some 5km distant. Secondary schooling is likewise 6km distant. These developments would not be sustainably located and would lead to avoidable additional GHG emissions. Development should be limited to local need.
- XII. Community Clusters In the view of the Society similar principles should be applied to development in Community Clusters as to open countryside. It is unlikely that any development in the listed Community Clusters would be sustainably located in relation to the policy to move to a low carbon economy. There is no convincing evidence that any of the small scale development envisaged in cluster settlements would make any significant difference to the viability of such settlements.
21. The additional development proposed in the hub settlements which are not located so as to move towards a low carbon economy amounts to some **564 (538) dwellings**. With the exception of those required to service needs local to the hub communities (of which no evidence is presented by the LPA), all of these dwellings are in locations which do not comply with Government Policy to move to a low carbon economy.

22. The overall strategy for the Review is that some 27% of dwellings would be in Hubs and Clusters. For the Oswestry Place Plan Area the figures are that of a total of 3520 dwellings to be constructed between 2016 and 2036, 51% would be in the principal centre, and 49% in Hubs and Clusters. However, if the large villages of Gobowen and St Martins are considered to be urban areas, then the remaining Hubs would accept 27% of the total.

23. The LPA states at paragraph 17.16 that Shropshire Council is “*responding positively to the principles outlined by the Oswestry Civic Society in its proposed Oswestry 2050*”. This is unfortunately a distortion of the facts. The principles on which Oswestry 2050 are based are those set out in this objection. Slide 8 of the presentation set out the position:

- Hubs and clusters in rural areas do not constitute sustainable development
- Development in rural areas should be no more than required to meet local needs

24. The Society maintains that development needs of the A5 corridor can only be met in a sustainable manner if located where main services are close by, and where the development can foster and be served by an integrated public transport system. That is the message of Oswestry 2050, and a “positive response” would recognise these principles.

25. The Society therefore **OBJECTS** to the inclusion of preferred sites for development in the following settlements:

- I. Kinnerley
 - II. Knockin
 - III. Llanymynech
 - IV. Pant
 - V. Ruyton XI Towns
 - VI. Trefonen
 - VII. West Felton
 - VIII. Weston Rhyn
 - IX. Whittington
- All Community Clusters

OSWESTRY AND DISTRICT CIVIC SOCIETY

Local Plan Review Regulation 19 Submission Sustainability Appraisal

Sustainability Assessment

OBJECTION

2/1/2021



Oswestry and District Civic Society

Objection to the Sustainability Appraisal

1. The assessment which concerns the Society is that referred to in the Sustainability Environmental Appraisal and Site Assessment Report accompanying the Regulation 19 Submission¹. At Pages 6/7, para 1.8 are listed the Key Sustainability Issues, and Objectives. Paragraph 1.9 sets out the stages of the Local Plan. At bullet 2 the stage of the Preferred Scale and Distribution of Development is listed. At this stage the LPA published the methodology and scoring system used to test the Strategy against the Sustainability objectives.
2. The process is illustrated in Table 1.1 of the document referred to in para 1 above. The state to which this evidence relates is that described in columns 4-6 of the Table – that is, the testing for sustainability of the Strategic Choices made, which are now embodied in Policy SP2 and the Plan as a whole.
3. This Assessment was published in November 2017. The Civic Society made an examination of so far as it related to rural development, proposed under the “Hubs and Clusters” policy, SP2.6. In order to carry this out, a number of questions were posed to the Planning Authority. These questions and the responses given are set out in the Annex . This assessment is termed SA1.
4. The Society has looked for evidence to support the Assessment. It should be noted that in many cases the Planning Authority relied upon the exercise of Professional Judgement (PJ). The Society has available to it an expert in the rigorous application of professional judgement, based on hearing evidence submitted during a long period of service both in Local Government and the Planning Inspectorate. The Inspector is invited to make her/his own judgement based upon the evidence submitted below.
5. There follows a table. This takes the scoring system for the Sustainability Assessment and examines it in the light of the answers referred to above.

¹ <https://www.shropshire.gov.uk/media/16750/sustainability-appraisal-of-the-regulation-19-pre-submission-draft-of-the-shropshire-local-plan.pdf>

The Inspector should note the additional evidence supplied in relation to the objection to Policy SP2, particularly concerning the propensity of rural development to significantly increase travel by comparison to urban sites; and the poor service provided by rural public transport.

6. From this examination it is concluded for SA1: **It can be seen that for the objectives considered the overall score changes from 7 “+” factors and one “0” (neutral) factor to 1 “+” factor, 3 “-“ factors and 3 “0” factors. Thus the balance changes from a largely positive Sustainability Assessment to a largely negative SA for the factors considered. Whilst not all factors have been considered above, it should be noted that the overall assessment recorded 8 “+” factors overall. It has been shown that 6 of these cannot be supported (7-1). The overall SA moves from being a positive assessment to a negative assessment. In plain words, the Strategy does not represent sustainable development.**

Sustainability Objective	LPA Score	LPA Commentary	ODCS Commentary	ODCS Score
2 Encourage a Strong and Sustainable economy throughout Shropshire	+ / + / +	Existing businesses likely to be maintained and supported	The LPA says this is a matter of Professional Judgement (PJ). There is no supporting evidence. There is no evidence at all that rural residential development supports the economy to any greater degree than does residential development elsewhere. Furthermore, because no rural settlement can provide as full a range of services as does an urban centre, the operating costs of business in serving remote residential locations will be greater than in an urban based economy. Therefore business will be less supported by rural development than by development in urban centres.	- / - / -
3 Provide a sufficient amount of good quality housing	++ / ++ / ++	Will contribute to meeting evidenced housing needs	The Strategic Housing Market Assessment gives no indication of the extent of need in rural areas. The evidenced need is authority wide.	+ / + / +
ditto		support provision of affordable housing in the rural areas	The LPA says that the provision of affordable housing in rural areas is supported by an assessment of need. No assessment is evidenced. The LPA was asked if any assessment had been made of the additional costs imposed upon families of limited means by being located away from main services and employment opportunities. No such assessment has been made. It cannot be assumed that there is any significant need for affordable housing in rural areas.	
4 Promote access to services for all sections of society	++ / ++ / ++	Access to services and amenities such as schools, surgeries, PO etc is likely to be maintained or enhanced	There is no evidence that this would be the case. The LPA says this is a matter of PJ. Policies for rural development have been in force long enough for the veracity of this judgement to be	- / - / -

			<p>tested, and supported by evidence. ODCS considers it unlikely that the amounts of development proposed spread throughout the County would make any significant difference to the availability of services. Furthermore, development located in hubs and clusters never has access to the range of services accessible to urban based populations. Therefore rurally based development policies cannot “promote” access to services. For sections of society without access to private car, access is difficult, and would not be promoted by fostering development in rural areas.</p>	
<p>5 Encourage the use of sustainable means of transport</p>	<p>+ / + / +</p>	<p>Approach likely to maintain or improve access to public transport in rural areas as well as coordinate development with future transport initiatives</p>	<p>Public transport (pt) in Shropshire, as in most rural areas, is in a state of historic decline. There is no evidence that the strategy proposed would lead to the maintenance of rural public transport, or that it has done so during the operation of policies to locate housing in rural areas. ODCS considers that pt has reached a state where frequencies, penetration and choice of destinations is so poor that most rurally located housing cannot be expected to have any significant access to pt. There is no evidence that where pt is available, it leads to actual use of sustainable means of transport. It is counter intuitive to suggest that this does take place. The LPA says all this is a matter of PJ . It should not be. Once again, this is amenable to study based on evidence which could be easily obtained.</p> <p>The LPA could give no evidence of any future transport initiatives, nor could they give any evidence that such initiatives would be so widespread as to</p>	<p>0/0/0</p>

			make any difference at all to the travel habits of residents. If there is no knowledge of such initiatives at the plan making stage, it cannot be said that there will be opportunities to co-ordinate development with such initiatives. The LPA states that this is a matter of PJ. Such a weak case arrived at by PJ underlines the poor quality of judgement used in drawing up the SA.	
6 Reduce the need of people to travel by car	+ / + / +	Alternative ways of working...are likely to be supported	There is no evidence that the preferred strategy would create alternative ways of working to any greater extent than any other strategy. This attribute does not flow from the strategy, and therefore would not contribute to its sustainability. Again, the LPA claims the exercise of PJ	0/0/0
ditto		Community Hubs are considered to be sustainable locations;	<p>There is no evidence to support this statement. The LPA states that it is a matter of PJ. The evidence produced by ODCS shows that development in Hubs does not meet the requirements of the three pillars of sustainability. Development here would not represent a move towards a low carbon economy, as required by pillar 3; it would therefore not be "in the right place" as required by pillar 1; access to services in Hub settlements, whilst not in all cases absent, is usually very limited. Therefore pillar 2 is not met well, and again it follows that development here would not be "in the right place". The LPA PJ appears to ignore these matters.</p> <p>The LPA was specifically requested to supply evidence for the conclusion that development in hubs would reduce the need</p>	

			for people to travel by car. None can be provided, again reliance being placed on PJ. Since residential development in Hubs is not shown to arise from a local need, it follows that the development will be of a dormitory nature. Car use to access jobs, shops and services in urban centres is inevitable, and cannot fail to be greater in degree than would arise from development in urban centres. The LPA PJ is erroneous, and cannot be supported.	
ditto		Development in Community Clusters is likely to maintain or increase a settlement's sustainability	This is an assertion unsupported by any evidence. The LPA again relies on PJ. The sustainability of a settlement must be a balance between the improvement in function, such as widening the service base of the settlement (better shop, school, surgery provision) against the locational disadvantages leading to higher car use, servicing costs and CO ₂ emissions. Since there is no evidence that the former has or would ever occur under the degree of development proposed, and there is ample evidence of the negative impact of the locational disadvantage, the overall balance must be negative, and therefore the LPA PJ is wrong	
9 Conserve and enhance water quality and reduce the risk of water pollution	-/?	May be adverse, but opportunities to remediate problems and prevent further deterioration of aquatic ecosystems	Reference is made by LPA to the SA Scoping report. Whilst this identifies issues, no evidence is given to support the view that the strategy offers opportunities for improving the water environment.	0/0/0
12 Reduce CO ₂ emissions	0/0/0	Development in rural areas offers opportunities for limited renewable energy installations	No evidence can be supplied to show that this effect would be neutral, the LPA relying on PJ. ODCS is of the view that emissions related to development in hubs or clusters is likely to be of the order of 20%	-/-/-

			greater than in urban centres. Opportunities for renewable energy installations are not likely to be any greater in a hub or cluster than in an urban centre. It is accepted that large scale economic development of renewable energy (eg Solar farms) is appropriate rural development, but this does not follow from the strategy, to the extent that a CO ₂ emissions would be neutral.	
<p>Summary. It can be seen that for the objectives considered the overall score changes from 7 “+” factors and one “0” (neutral) factor to 1 “+” factor, 3 “-“ factors and 3 “0” factors. Thus the balance changes from a largely positive Sustainability Assessment to a largely negative SA for the factors considered. Whilst not all factors have been considered above, it should be noted that the overall assessment recorded 8 “+” factors overall. It has been shown that 6 of these cannot be supported (7-1). The overall SA moves from being a positive assessment to a negative assessment. In plain words, the Strategy does not represent sustainable development</p>				

7. There was then a further consultation on the Preferred Sites, in essence a precursor of the Regulation 18 Consultation. The following sets out the additional concerns of the Society at that stage of the process.:

7.1. The Society refers to the Sustainability Appraisal for the Preferred Sites stage of the Review (SA2). The Society raises the following objections:

7.1.1. Appendix A to the SA Report purports to set out consultation responses on the SA for the Preferred Scale and Distribution of Development. (SA1) It makes no reference to the response made by the Oswestry and District Civic Society. That response was a detailed critique of SA1, and concluded: *that the SA is a flawed process which purports to rely on professional judgement to a large degree; and that that professional judgment can be shown to be poor quality.* The Society **OBJECTS** that its views have been omitted from the consultation response.

7.1.2. The SA for the Preferred Sites stage of the Review is also considered to be flawed, and as a result the Society **OBJECTS** to the SA2 being used as support for the adoption of preferred sites. The Society’s reasons are given below:

7.2. SA2 sets out the Sustainability Objectives², including

² SA2 Table 2.1

- a. SO5 Encourage the use of sustainable means of transport
- b. SO6 Reduce the need of people to travel by car
- c. SO12 Reduce carbon dioxide emissions

7.3. In relation to these objectives the SA Criteria for Sites³ are set out. For SO 5 and SO 6 the criteria take into account the proximity of community facilities:

- a. Primary School,
- b. GP surgery ,
- c. Community Hall ,
- d. Leisure centre,
- e. Children's playground,
- f. Outdoor sports facility,
- g. Amenity green space
- h. Accessible natural green space;

And

Whether or not there is a regular peak time bus service within walking distance of the site. A public transport service is considered to be regular and offered during peak travel times when it runs an outward service between 0600 and 0900 and a return service between 1500 and 1800 Monday to Friday.

7.4. For SO 12, the SA sets no criterion at all.

7.5. The Society makes the following observations:

7.5.1. With regard to SO12, The matter appears not to enter into the appraisal of sustainability, even though it is Government Policy to move to a low carbon economy. In the Society's view the move to a low carbon economy requires action at all levels, from personal decisions to national and supra national. There is consensus at international level that action is required urgently. Given the intractability of transport in reducing emissions, land use planning has an important part to play in taking care not to increase emissions from transport. Shropshire Council appears not to recognise these facts. The proposals of the review do not meet Government Policy quoted at the head of this submission. (ie the Sustainability "pillars" of the NPPF)

7.5.2. With regard to SO5 and 6 a site which is assessed to meet the above criteria is unlikely either to encourage the use of sustainable means of transport, or reduce the need for residents to use the private car. One would in any event question whether it is

³ SA2 Table 2.3

appropriate merely to assess whether a site's location reduces the "need" for private car use. What should be assessed is the likelihood that a site location would lead to private car being the choice of mode.

7.5.3. The NPPF, at paras 102-5 requires that patterns of growth should be actively managed to achieve results which are encapsulated in Oswestry 2050, but the SA fails totally to address the requirements of these policies - opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; and opportunities to promote walking, cycling and public transport use are identified and pursued. There is no "active management" of the pattern of development here. The lpa has taken no account of Government Policy.

7.5.4. The SA fails to address accessibility to the main trip generators – employment opportunities, weekly shopping locations, and secondary schools. Leaving out these locations skews the results in favour of rural development, and the SA is therefore defective.

7.5.5. The lpa approach appears to be naive in the extreme. There can be little argument that sustainable development patterns are those which minimise the distance travelled; minimise the number of private car trips, and enable the provision of attractive public transport. SA1 and 2 proceed on the basis that a development is sustainable if it achieves the bare minimum of public transport access, and pays no regard to the accessibility of those services which are most used. Nowhere in government policy is support found for such an approach.

Summary and conclusions

The Oswestry and District Civic Society **OBJECTS** to the preferred site allocations for the Oswestry Place Plan area on the grounds that they do not represent sustainable development as defined in the NPPF; and that the Sustainability Assessment which purports to underpin the LPA recommendations is flawed by a failure to take account of Government policy, by the omission of factors crucial to the assessment of sustainable locations. The Society therefore **OBJECTS** to the conclusions of the SA"

8. The above is the evidence submitted at the time. It stands on its own account. The later evidence submitted in the objection to Policy SP2

further develops these themes, and can equally be applied to the Sustainability Assessments.

9. Not every objective, or issue was examined by the Society. Those which were not examined are not challenged, but the overall conclusion drawn by the Society is unaltered. Those which were examined pertain to the aspects of sustainability to which the greatest weight must attach – those which relate to carbon emissions, and the related issue of transport. These pertain to the greatest threat facing mankind – that of climate change.
10. These Assessments are the building blocks of the Local Plan, and purport to show that the Local Plan represents sustainable development. In so far as development in Hubs and Clusters is concerned, it is the Society's view, which it commends to the Inspector, that the Assessment is defective. Where evidence could be shown relating to the issue being assessed, it is often absent. It does not support the policy conclusion that development in these areas would be sustainable. Furthermore, a professional assessment of the issues shows that development in Hubs and Clusters is not sustainable.
11. For all the above reasons, the Inspector is invited to conclude that the Sustainability Assessments relating to development in hubs and Clusters does not support soundness of the strategic policy choice made within the Local Plan.

Annex

Local Plan Review - 'Preferred Scale and Distribution of Development' Consultation

Questions from the Oswestry and District Civic Society.

These questions are largely directed at the strength of the evidence base for the chosen strategy. It would be helpful if in circumstances where there is no evidence base, but the assessment is a matter of professional judgement, there could be a simple statement to that effect. The Sustainability Assessment report has been used as the reference base, but there is also reference to the Hierarchy of Settlements report.

Response: The Sustainability Appraisal (SA) objectives are informed by an evidence base. This is summarised within the SA Scoping Report which is available on the Shropshire Council website. The assessment of the effect that a Local Plan has on these objectives is a matter of professional judgement.

Scale and Distribution of Development SA Report

- 1 Please explain how sustainability is determined. Is it a matter of adding up all the "+" results, and removing the "-" results, such that more "+" than "-" equals sustainable policy? If so how is "-/?" dealt with?

Response: SA is a qualitative rather than quantitative process so results are not added up. However, Shropshire Council appreciate that a matrix showing a series of + - ? and 0 can be difficult to follow so a written commentary is also provided alongside the results for each sustainability objective. The commentary aims to present the overall effect on the objective in more accessible terms. These commentaries are then combined to give a longer written commentary for each aspect of the Plan being assessed. In turn, these commentaries are combined to produce the SA Summary Report.

A score such as "-/?" reflects different potential scenarios e.g. *"It may not be possible to locate all this employment land in areas of lowest flood risk but at the same time, larger scale growth creates more opportunities for flood management measures."*

- 2 The Civic Society proposed a further distribution option which would limit residential development in rural areas to that which was evidenced by local need, since this appeared to be an approach which was sustainable in the terms of the NPPF. It is noted that this comment cannot be discerned within the report on consultation, and this proposal has been discounted in the formulation of the draft strategy. Has a sustainability assessment been carried out on this proposal? If not, how was the strategy decided against?

Response: All consultation responses received during the Issues and Strategic Options Consultation were considered along with other material issues and emerging evidence in arriving at the Preferred Option presented for further consultation. The other material issues Shropshire Council officers have considered include:

- The evidence base produced to support the Local Plan Review;
- The objectives of the Shropshire Economic Growth Strategy – consistent with the Economic Growth Strategy, the proposed spatial distribution prioritises investment along strategic corridors and growth zones, utilising existing road and rail connections. The strategic corridors are:
 - Eastern Belt M54/A5/A41/A464/A5 and A454/A458, supporting Shropshire’s links to the West Midlands region and the role of the West Midlands Combined Authority, including opportunities around Bridgnorth as a Principal Centre within the context of the ongoing Green Belt Review;
 - A5 West corridor, including the Principal centre of Oswestry as Shropshire’s second largest market town;
 - Central Shropshire, focussed primarily on opportunities in Shrewsbury as the County Town and Strategic Centre;
 - North East Shropshire and the A41 corridor; including Whitchurch and Market Drayton, and also supporting opportunities connected to the delivery of HS2 in the second half of the Plan period; and
 - A49 corridor, including settlements along the corridor especially opportunities around Ludlow as the key historic, market town.
- Environmental constraints present in Shropshire;
- The need to allow committed, but unbuilt housing and employment proposals the opportunity to be delivered.
- The ability to utilise and respond positively to investment opportunities as they emerge; and
- Deliverability of development.

The SA which informs this current consultation, considers only the Preferred Options presented.

- 3 The strategy proposed is largely that which arose from SAMDev. What monitoring has been carried out of development in accord with that strategy of the parameters utilised in sustainability assessment, in order to inform the present assessment? In other words, can development which has been carried out be shown to have been “sustainable”, providing evidence for this strategy?

Response: The proposed distribution of development varies from that within the SAMDev Plan, as it is proposed that there will be a higher proportion of development focused within Urban Areas.

The SAMDev Plan itself was only adopted in December 2015. Shropshire Council monitors the effect of its policies and the delivery of development within its Authority Monitoring Report and Housing Land Supply documents. These are available to view on the Shropshire Council website.

Shropshire Council is seeking to ensure a plan led approach to development, which specifically promotes sustainable development. If we should be unable to promptly deliver

and defend a sustainable replacement plan (which will be subject to an independent examination as SAMDev was) then there is a real risk that, in light of changes to national policy, it will be viewed as 'out of date' and will carry less weight in planning decisions. This outcome would be likely to result in significant additional pressure for development in rural settlements, including in those with limited access to facilities, services and infrastructure.

Referring to table 3.4

- 4 Sustainability objective (SO) 2 p21/22: What is the evidence that residential development in Hub/Cluster settlements supports existing rural businesses to any greater extent than does residential development taking place in Strategic, Principal and Key Centres? Is this "+" conclusion a matter of professional judgement rather than evidence based deduction?

Response: Yes, the conclusion is a matter of professional judgement.

- 5 SO3 p22: "*This approach will contribute to meeting evidenced housing needs*". Has any assessment been made as to the extent that the housing needs are being made at or close to the point of need?

Response: The housing need for Shropshire has been calculated within the Full Objective Assessment of Housing Need (FOAHN) Report 2016 and FOAHN Background Paper (2017). A breakdown of this need will be undertaken within the Strategic Housing Market Assessment (SHMA). This will also be supplemented by local needs assessments in some areas.

- 6 SO3 p22: "*Support the provision of affordable housing in rural areas*". What evidence is there of a need for affordable housing to be located in rural areas? Has any assessment been made of the additional costs imposed on families (who are by definition of limited means) located away from main services and employment opportunities?

Response: The provision of affordable housing in rural areas is supported by an assessment of need.

The proposed spatial distribution of development, proposes a greater proportion of development in urban areas, in recognition that these areas have greater availability of services and facilities.

Furthermore it is also proposed that the majority of development in rural areas will be focused in the proposed Community Hubs, these settlements have been identified through an assessment of the services and facilities available.

- 7 SO4 p22: What evidence is there that without the level of additional rural development postulated existing services will not be maintained?

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

- 8 SO5 p22: What evidence is there that rural public transport will be maintained as a result of the strategy proposed? What evidence is there that rural development permitted in recent years has led to any public transport service being maintained or enhanced? What evidence is there that where public transport is available, it actually leads to transport which is sustainable overall? Cars following empty buses do not equal sustainable transport.

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

- 9 SO5 p22: *“providing opportunities to co-ordinate development with future transport infrastructure provision”*. What provision is programmed in the plan period which would provide these opportunities? Are they so widespread as to underpin a sustainability score for the strategy as a whole?

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

- 10 SO6 p22: *“Alternative ways of working . . . are likely to be supported”*. What evidence is there that the strategy would have this effect any more than any other strategy? What evidence is there that this is a particular attribute of rural development rather than of urban based development?

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

- 11 SO6 p22: *“Community Hubs are considered to be sustainable locations”*. What is the evidence to support this statement? Perhaps this could be addressed by reference to the three dimensions of sustainability and para 17 of the NPPF.

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

- 12 SO6 p22: What is the evidence that development in Hubs would reduce the need for people to travel by car?

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

- 13 SO6 p22: “Development in Community Clusters is likely to maintain or increase a settlement’s sustainability” appears to be simple assertion. Where is the evidence which can be directly related to all the requirements of the three strands of sustainable development set out in the NPPF?

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

- 14 SO9 p22: What problems of water quality does the assessor have in mind? How would the opportunity for remediation arise? If from CIL, how would the planning authority ensure hypothecation of the funds to remediation of water quality?

Response: The issues affecting water quality are identified in the SA Scoping Report <https://shropshire.gov.uk/media/7274/sa-scoping-report.pdf>

See Table 4.5 for a summary of these and Tables 2.5 and 3.5 for more detailed information on the plans and programmes and baseline information respectively which have informed this summary.

- 15 SO12 p23: Transport is the highest component of CO₂ emissions (Scoping Report Table 4.7). A simple analysis carried out by the Civic Society shows that CO₂ emissions related to a household located in a Hub or Cluster settlement within the Oswestry area would be likely to lead to a 20% higher CO₂ footprint than one located within the Principal Centre, due to emissions from transport associated with the location. It is frankly, blomin obvious. What is the evidence to support the conclusion that this strategy would be neutral in effect?

The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic.

Hierarchy of Settlements Report

- 16 Table 1: Referring to public transport links: the existence of a bus service in a remote area is not necessarily an indication of a useful service. The service may be incidental, and may be unattractive. The test must surely be that the bus service would reach a Strategic, Principal or Key Centre within a reasonable time (30 minutes), and that there are more than 8 hours between the arrival of the outward service and the departure of the return service. The acid test of attractiveness is that the service is already well used. A peak hour load factor of 50% would indicate an attractive service. Has any such analysis been built into the scoring? It is appreciated that variation in this score would have little impact on the categorisation – even though when reflected in the

sustainability assessment this attribute is responsible for one “+” score out of the eight “+” scores totalled, and is therefore an important attribute of sustainability.

Response: The methodological approach utilised in the Hierarchy of Settlements Document is based on a methodology consulted upon during the Issues and Strategic Options consultation of the Local Plan Review. 73% of respondents indicating their support for the proposed methodology.

The methodology that was outlined within the Issues and Strategic Options consultation provided a definition of what would be considered an active public transport link and a regular public transport link, the definition has been utilised within the Hierarchy of Settlements assessment.

Shropshire Council considers that this methodology best reflects the considerations of whether a settlement has access to a public transport link and if so whether this link offers a regular service. A consistent approach to the consideration of these factors has been applied to all settlements screened-in to the assessment.

17 A community which has a rudimentary bus service (eg Knockin Heath) scores exactly the same as does one which is a focus of public transport (eg Oswestry, Shrewsbury). **This is such an obviously irrational conclusion that it calls into question the robustness of the whole exercise; and therefore the whole “Hubs and Clusters” approach; the basis of the distribution of development, and therefore the strategy as a whole.**

Response: Please see the response provided to Question 16.

18 There are further anomalies, in that the assessment is dead to qualitative differences between settlements. For example, in this locality there are three identified “settlements” – Kinnerley, Knockin, Knockin Heath. In Knockin is a Surgery which serves all three communities, but only Knockin scores. In Kinnerley is a school which serves all three communities, but only Kinnerley scores. Kinnerley has a village hall which is thriving, and used every evening. Knockin has a village Hall which is little used and of doubtful viability. Yet both communities score the same high score. Similarly both Knockin and Kinnerley have a post office/convenience store. But whilst that at Kinnerley could fulfil the function described as a primary service, there is absolutely no means by which this description could be applied to the shop in Knockin.

Response: The assessment is intentionally focused on quantitative factors in order to allow direct comparison between settlements.

D Ward
Planning adviser to ODCS
3 November 2017

OSWESTRY AND DISTRICT CIVIC SOCIETY

Local Plan Review Regulation 19 Submission Policy SP2

Objection Policy SP2

7/2/2021



Summary

The plan cannot be considered to be sound for the following reasons:-

The strategic decision to locate some 27% of all residential development within the rural settlements under the “Hubs and Clusters” policy, SP2, is

- Not justified as an appropriate strategy, since a lower carbon strategy has been shown by evidence to be a reasonable alternative;
- Not Consistent with national policy as expressed in the NPPF para 8c “moving to a low carbon economy”; and those of the NPPF which are expressed within Policy SP3;
- Is inconsistent with the zero carbon spatial vision set in the plan for the County;
- Is inconsistent with the declaration of a Climate Emergency by the UK Parliament on 1 May 2019;
- Is inconsistent with the goals of the Paris Climate Agreement, to which the UK is a signatory¹ ;
- Is inconsistent with the Zero Carbon Shropshire Plan produced by the Shropshire Climate Action Partnership, of which Shropshire Council is a partner²;

¹ https://sustainabledevelopment.un.org/content/documents/17853paris_agreement.pdf

² <https://zerocarbonschropshire.org/zcsplan/> See Page 28 3rd bullet point of Local Authority actions

- Is inconsistent with Shropshire Council's declaration of a Climate Emergency in May 2019;
- Is inconsistent with the 6th Carbon Budget published advice to Government by the Committee on Climate Change

This objection demonstrates that rural development:

- will lead to up to 9 times more travel than development located in a key centre;
- cannot be realistically served by public transport;
- and cannot favour active means of travel;
- will lead to excessive amounts of embodied carbon in the automobile fleet;

all of which fail to meet requirements of the NPPF and policy SP3.

It has been demonstrated that the Sustainability Appraisal on which the strategy rests lacks credibility due to poor professional quality. This is the subject of a specific objection.

The aspirations of the rural development policies are not supported by any clear evidence.

There are preferable means of meeting the needs for development land.

In addition, the Society objects individually to development proposals for Kinnerley; Knockin; Llanymynech; Pant;

Ruyton XI Towns; Trefonen; West Felton; Weston Rhyn; Whittington, and all Community Clusters within the Oswestry Place Plan area. This is the subject of a specific objection.

Introduction

1. The Oswestry and District Civic Society has made a consistent objection to the strategy on which the local plan has been based. In brief, it is the Society's view that so far as it seeks to locate residential development in rural settlements, it fails to meet policies requiring reductions in carbon emissions.
2. For the area in which it is interested (the Oswestry Place Plan Area), the Society contends that some 400 to 500 dwellings proposed in the plan would be located where their accessibility to employment and frequently accessed major service locations would be such that it maximized travel, contrary to the requirements of the NPPF and Policy SP3. Required travel could not be reasonably expected to be undertaken by public transport, and therefore the development pattern encourages the use of the private car, and delivery patterns which fail to minimize carbon emissions.
3. It should always be borne in mind that building in a location which entails unnecessarily high carbon emissions builds those emissions into the fabric of Shropshire for the life of the development – 100 years or more.
4. Furthermore, by application of the Council's own growth projections, the Society has demonstrated that, in principle, it would be possible to plan within the A5 strategic corridor for a modern settlement in which the major local employers and residential areas were linked together by attractive high frequency, economic and low carbon public transport services, and that this would be a sustainable means of accommodating all the development proposed in sustainable suburbs, with no

demonstrable adverse effects on the rural settlements proposed as Hubs and Clusters.

5. It is a matter of regret that the planning authority have consistently failed to give this matter serious consideration stating that they have a preference for an incremental approach to planning – that is, field by field, with no strategic aim or vision for this strategic corridor.

Submission as to the Reg. 19 Draft

6. The plan as developed previously simply set out to carry forward policies for the allocation of land. It is a highly welcome and overdue development that the Plan now brings in a suite of strategic policies, in particular those which respond to the Climate Emergency, Shropshire's response to which is detailed in para 4.106 of the plan. Policy SP3 sets out a strategic approach to climate change. The Civic Society has been pointing to the need for such policies to be at the foundation of local planning during the whole period of development of this plan, and before.
7. Previous submissions made during consultation on this plan showed that:
 - I. Strategies which allow for more rural development than necessary to meet local need to serve local employment do not comply with policies requiring development to be sustainable.
 - II. All options in the draft Strategy imply significant development in rural areas, beyond that required to meet local need, and are therefore all contrary to Government Policy, and cannot be supported.³

³ Detailed in the submission on preferred sites Annex B

8. The Government Policies referred to were those which required planning to respond to the threat posed by Climate Change. Those policies are now included as strategic policy SP3 in the plan. It follows that the plan is now internally inconsistent, fails to meet Government policy for moving towards a low carbon economy; and therefore cannot be judged to be “sound”.

Further Details – 1 Sustainability Appraisal

9. In relation to development outside urban areas, the Society concluded:
- I. that the Sustainability Appraisal is of very poor quality, and cannot be taken to support the Strategy it purports to appraise; (see footnote)⁴. This is the subject of a separate objection
 - II. that development in Hubs and Clusters has not been shown by any evidence to be sustainable;
 - III. and further, what evidence there is shows that development in these rural settlements is unsustainable⁵.
10. The principal failings of the Sustainability Appraisal are:
- I. That it fails to compare carbon emissions between available sites;
 - II. That it takes an absolute approach, asking the question “does development of this site meet the threshold for sustainability as defined by the chosen measures”, rather

⁴ Sustainability Assessment Report - Rural Settlements Table 3.4: The conclusion is that the balance changes from a largely positive Sustainability Assessment to a largely negative SA for the factors considered. The overall SA moves from being a positive assessment to a negative assessment. In plain words, the Strategy does not represent sustainable development.

⁵ See Appendix 2 to the objection to the Preferred Sites , Annex C (Objection to the Sustainability Assessment)

than asking the question “would development of this site be more sustainable than others”, such that the cumulative result of all development would provide the most sustainable overall development pattern;

- III. That in important respects, notably the efficiency of public transport as a competitive alternative to the private car; and the societal conditions offered to households and members of households without access to a private car, the appraisal fails to make a realistic assessment.

Further Details 2 – Zero Carbon

11. The plan now states that *communities will be safe and healthy as Shropshire moves positively towards a zero carbon economy; all residents will be able to access well-designed, decent and affordable homes in the right location*. To achieve this Policy SP3 requires that development should be reducing carbon emissions by 1. a. Minimising the need to travel and maximising the ability to make trips by sustainable modes of transport. It follows that for a home to be in “the right location” it must meet these two policy requirements.

Minimising the need for travel

12. Policy SP3 and the NPPF, para 104(a) require that the need to travel should be minimised.
13. The Sixth Carbon Budget⁶, required under the Climate Change Act, will provide ministers with advice on the volume of greenhouse gases the UK can emit during the period 2033-2037. It will set the path to the UK’s new net-zero emissions

⁶ <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

target in 2050, as the first carbon budget to be set into law following that commitment. In relation to the actions of local authorities it states⁷:

Local Authorities (LAs) have a key role in reducing emissions and facilitating strategies to deliver decarbonisation, with leverage in several areas:

- *They often have direct or strong control over local transport, housing and land-use policies, although the extent of this varies for each LA.*
- *LAs have the potential to influence the transition to low -carbon transport across areas such as planning,:*
- *Planning policy can steer spatial and local planning that favours housing and commercial developments in the right places to reduce traffic and support efficient logistics.*

14. Much travel derives from the location of development, and its accessibility to frequently visited destinations – workplaces, shopping, schools. Whilst there is little information as to workplaces, local knowledge allows broad estimation of location of shopping, education, service and socialising areas between development located in the Hubs and Clusters around Oswestry, and alternatively the same amount of development located around the core of Oswestry.

15. From the National Travel survey⁸ it can be seen that over a year, a person will make, on average 536 trips, of which 35% are for shopping purposes, 27% commuting, 5% on business, 17% for personal business (e.g. visiting service providers) and 15% socialising. Taking as an example the site in Oswestry designated as a Sustainable Urban Extension (SUE) and comparing it with those rural sites which are not seen as being

⁷ <file:///C:/Users/User/Downloads/Policies-for-the-Sixth-Carbon-Budget-and-Net-Zero.pdf> Box 2.2, Page 66

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/823068/national-travel-survey-2018.pdf Chart 15

of neutral effect⁹ it is demonstrable that rural development increases the overall amount of travel per household.

16. These factors are tabulated in Annex A. Whilst there must be a significant range in the estimates provided, this analysis shows that development in the Hubs and Clusters is not of small impact in its conflict with Policy SP3. For the factors analysed, which account for nearly 70% of household travel, a household in a rural area is likely to produce around 9 times the amount of travel than one located in Oswestry itself. The 538 dwellings¹⁰ proposed in the rural areas surrounding Oswestry are likely to lead to over 6 times the amount of travel than the 800 dwellings proposed to be located in the SUE. This is not a minimal conflict with policy, it is a stark illustration of the failure of the planning authority to appreciate the impact of a policy of “rural rebalance” which has never been closely analysed for its benefits, and for which the only justification in this plan is a Sustainability Appraisal of dubious professional quality, which for the most part is not based upon any actual evidence.
17. In household terms, it is estimated that the impact of rural development on the 2030 Household Carbon Budget due to additional travel is of the order of 11% addition.¹¹ That is not a “move towards a low carbon economy” required by the NPPF.
18. The Strategy embodied in Policy SP2 works in direct contravention to the policy advice of the 6th Carbon Budget, and the key role of Local Authorities to *steer spatial and local*

⁹ For example, Gobowen has a main line railway station, relatively good bus services and a significant local shopping offer. Development there is likely to be adequately served. St Martins has a large independent supermarket.

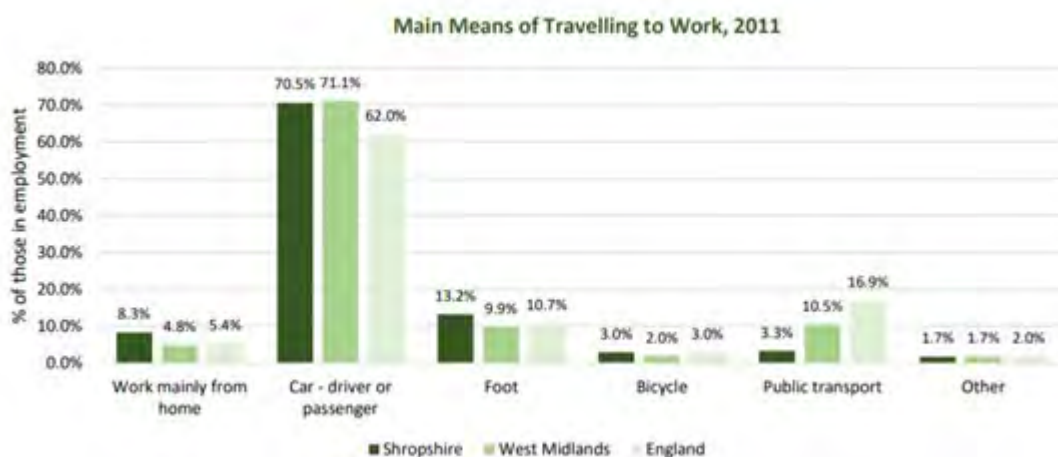
¹⁰ Allocations plus windfalls as on schedule A5(ii) of the Draft Plan at pages 346 - 347

¹¹ Annex B

planning that favours housing .. in the right places to reduce traffic. On the assumption that this advice is accepted by Government and the Carbon Budget is set into law, then Policy SP2 cannot do other than be in conflict with Government policy, and the expectations of the part Local Authorities have to play in achieving that policy. This matter will be established by the time of the examination into the Plan.

Maximising the use of sustainable transport

19. Policy SP3, as a direct quotation from paragraph 103 of the NPPF, requires that the ability to make trips by sustainable means of transport should be maximised. It must be recognised that a household will generate trips at all times of the day for a variety of purposes. Sustainable means of transport encompass bus, cycling and walking, and for longer distances rail.
20. Shropshire's rurality also means that car dependency is high. Just 15.8% of households in Shropshire do not have a car compared with just over a quarter of households (25.8%) nationally. This reflects in the low public transport use for work journeys in the county:



Bus

21. Most minor Hubs and Clusters are served by a single route providing a single bus in the peak hour in each direction, with services stopping early in the evening. In common with the rest of the country, use of rural services has declined by about 31% in the last decade and there is little being done in Shropshire to stem the decline. It is doubtful whether an effective rural bus service remains.
22. Services from Community Hubs show an inability to serve the employment centres in Oswestry, Shrewsbury and Wrexham. As examples, take the Hub villages of Kinnerley and Knockin, West Felton, and Weston Rhyn.

Hub-Town	First bus	Last bus	Duration (minutes)	Frequency (minutes)	Time by car (minutes)	Cost by car* 1 way £	Cost by bus 1 way £
Weston Rhyn - Wrexham	6.23	18.52	50	60	20	1.76	5
Weston Rhyn-Oswestry	7.23	17.42	11	30	11	0.65	3-4
West Felton - Shrewsbury	9.04	16.12	34	30	20	2.24	4-6
West Felton - Oswestry	9.10	16.42	22	30	10	0.75	4-5
Kinnerley-Oswestry	08.13	17.52	17	90	15	1.12	4-6
Kinnerley - Shrewsbury	07.26	17.28	59	90	20	2.08	6-7

*Cost by car – Fuel cost at 13p/mile; maintenance at 3p/mile

Parking charges daily Shrewsbury £5.50; Wrexham £3.50; Chester £3.50. Oswestry £2.00 Park and Ride Shrewsbury, Chester £2 per person

23. These services suffer in competition with car based modes:
- Impossible for many destinations away from the routes themselves,
 - In most cases are slow, and in all cases will be slower when terminal connections are taken into account;
 - Are costly, even taking into account terminal car parking costs.
 - Do not permit flexibility in working hours.
24. In any locality outside major urban areas it is difficult for public transport to provide services to scattered workplaces. For more centrally located services such as shopping and secondary education, which may constitute up to 50% of all household trips, public transport can be a far more effective mode. But this can only happen if dwellings are located close to frequent and short public transport routes, as can be achieved within an urban area. Oswestry has a reasonable range of “town”

services, which enable access to the town centre and main supermarkets. These tend to run on a 30 minute frequency. Because of the short distances involved there is a far better prospect of these services providing an effective means of transport, particularly if development is further concentrated in the town.

25. Every dwelling located in the rural areas has little chance of being served by effective bus services for shopping trips, and where school bus services cannot penetrate, car journeys are the likely alternative. The average distance for rural sites proposed in the plan for weekly shopping trips to supermarkets in Oswestry is of the order of 9km; and to secondary schools the same. By contrast, the distance from the centre of the major housing site in Oswestry, the aptly named Sustainable Urban Extension (SUE) is 0.5 km to a major supermarket, and 2 km to the secondary school.
26. It may be argued that the advent of the electric car, powered by renewable electricity removes the carbon disadvantage of a rural location. However, nationally, car ownership in urban areas stands at 1.23 per household, and in rural areas 1.78¹². Thus for every two rural dwellings there is a car in addition to the numbers in urban areas. There are very large amounts of carbon embedded in the construction of a car, whether oil fuel powered or electric – around 10 tonnes CO₂e per vehicle. Given the average longevity of a motor vehicle as just under 14 years¹³, this means that use of a rural dwelling will, on average, be responsible for 350kg CO₂e emissions greater than an urban

¹² Household car ownership by region and Rural-Urban ... - Gov.uk
assets.publishing.service.gov.uk › system › file › nts9902

¹³ <https://www.smmmt.co.uk/industry-topics/sustainability/average-vehicle-age/>

dwelling – the equivalent of a one way flight from London to Vancouver every other year.

27. Additionally, every rural dwelling has to be serviced. Where the service agent is located in the urban area, then a corresponding increase in the service fleet, and its embedded carbon, will arise.
28. The Climate Change Act requires government to adopt Carbon Budgets. The Committee on Climate Change Fifth budget was adopted by Parliament in 2016. It illustrated a reduction in household budgets to 2030, on the track to an 80% reduction by 2050. That allocated 4.5 tonnes CO₂e per household in 2030. With the legal requirement now being 100% by 2050, more stringent reductions are required, and in any event the reductions will proceed beyond 2030. But, even on these outdated figures, the additional car amounts to an increase of 26.6% carbon emissions¹⁴ attributable to the average rural household. This means that corresponding reductions in carbon emissions will be required in other sectors in order to achieve zero carbon.

Cycling

29. A core planning policy of the NPPF and Government cycling policy requires patterns of growth to be actively managed to make “the fullest possible use of...cycling”¹⁵. The Plan’s Policy SP3 1.d requires the *Prioritising (of) use of active travel through the creation and enhancement of walking and cycling links within and between new developments and from new developments to existing neighbourhoods and community facilities*

¹⁴ Annex B

¹⁵ NPPF para 102/3

30. The majority of cycling trips are for short distances, with 80% being less than five miles and with 40% being less than two miles¹⁶. In 2013, 109 cyclists were killed in Great Britain, representing 6% of road deaths that year, a higher proportion than their modal share of 2%. Cyclists also accounted for 14.5% of seriously injured road casualties in 2013.¹⁷ It follows that to make the fullest possible use of cycling the active management of patterns of growth must enable the provision of safe facilities, and short distances. The pattern of growth locating a high proportion of new dwellings in rural areas fails to do this. In fact it actively works against cycle use, due to distance, the dangerous nature of the A5 and A483 for cycling, and the absence of good quality cycle ways. Many routes involve gradients which militate against the use of the bicycle.¹⁸
31. These policies cannot be fulfilled for a quarter of the additional population under the plan's proposals. Once again, the plan is inconsistent internally. Conversely, the Society's proposals for the A5 corridor are ideally suited to the provision of cycle communications, with short distances over level topography.

Walking

32. The NPPF and Policy SP3 likewise require active management of growth patterns to favour walking. There is no possibility of developing walking as a means of communication when development takes place in isolated small communities. It is true that walking as a rural recreation is fostered by such organisations as Parish Paths partnerships, but this does not depend upon new development, and walking for recreation is

¹⁶ https://www.ciht.org.uk/media/4461/ciht_-_planning_for_cycling_proof_v2_singles.pdf

¹⁷ *ibid*

¹⁸ The Inspector is invited to travel from Oswestry to Trefonen, by bicycle, either really, or in the imagination.

equally available to residents of development located in Oswestry.

33. Car ownership in Shropshire is high, but that does not mean that every person has a car available. 16% of households have no access to a car, and the fact that there may be one car available does not necessarily help the travel needs of the rest of the family. In the rural areas those without a car can be isolated and dependent upon others – such as the community car schemes operated under Shropshire Council’s auspices. For those without a car, a home in a rural village is unlikely to be in “the right location”.

The social effects of rurally located dwellings

34. There are further disadvantages to the location of additional residential development in rural areas so far as the satisfaction of this policy is concerned. Whilst villages do offer social facilities which are supported by existing rural development, the towns provide a wider range, particularly for the young. For this section of society, there is greater attraction to be found in the towns, where more sophisticated leisure facilities will be found. Rural development will lead either to these facilities being denied to young people, with attendant social cost, or lead to parental “taxi” services, again running counter to the intentions of policy SP3. Please see annex C for an unsolicited account of the effects of the lack of a bus service in a rural settlement, Ditton Priors. This settlement is classified as a Community Hub Settlement – Policy S3.2, page 188.
35. For a resident of an “affordable” dwelling the consequences might be serious. By definition, the residents of an affordable dwelling will have come to reside there because they are in

need of housing which they are financially precluded in obtaining in the open market. It follows that a location which minimizes travel, and does not require the availability of a car, will place less demand on family finances. Except in cases of demonstrable need for affordable housing in a rural location, such development should be confined to urban areas.

36. Zero Carbon Shropshire¹⁹ advocates the development of car clubs to help counter the embodied carbon in cars. These may well alleviate the disadvantageous impacts of rural development by spreading the embedded carbon amongst several households. But, as yet, there is no example of a functioning car club in rural Shropshire, let alone one which is effective in this regard.

Purported benefits of Hubs and Clusters

37. The Strategic Approach, set out in Policy SP2 states:
Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development within Community Hubs, which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or enhance their sustainability.
38. The policy of seeking to ensure long term sustainability of rural communities has been in operation since the adoption of the Core Strategy (2011), at least. Any observer can see that it has turned many villages into dormitory settlements. Whilst sustainability in terms of retention of services may have been enhanced, there has been no systematic gathering of evidence

¹⁹ <https://zerocarbonshropshire.org/zcsplan/> P28

to demonstrate that these policy aspirations have been achieved.

39. There is always a balance to be struck. The evidence given in this submission concerning the carbon and travel impacts of rural development has to be balanced against the perceived benefits of supporting local services such as village shops, pubs, halls and schools. As noted, there is no evidence that further development would significantly support services of this type. Village shops thrive according to the attractiveness of their offer, and already maintain their presence in most Hub villages. Whilst there are pubs in most villages, it is common experience that they draw their clientele from a wide area, both urban and rural. Indeed, one of the most successful pub in the Oswestry area is totally divorced from any settlement. Schools do not operate on catchments, but on parental choice, so cannot be said to be dependent of the surrounding settlement.
40. Even were it to be shown that there were widespread benefits in rural development supporting local services, that benefit has to be set against the large scale quantified harm to policies for a low carbon future, and the actual harm to the climate. Nothing underpins the necessity to carry the rural settlement policy embodied in Policy SP2 in to the future beyond political whim, pandering to the desire of builders to sell rural development, and a failure to recognise the Council's own declaration of a Climate Emergency.
41. The NPPF, at paras 102-5 requires that patterns of growth should be actively managed so that opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be

accommodated; and opportunities to promote walking, cycling and public transport use are identified and pursued. There is no “active management” of the pattern of development here. The Ipa has taken no account of this Government Policy.

42. On the other hand, this evidence given in this submission shows that there are severe adverse sustainability characteristics attaching to the policy.

An alternative approach

43. The Society has therefore concluded that the development pattern proposed by the draft plan fails to meet the strategic policies set in the plan in recognition of the climate emergency, and Government policies having the same thrust. To show that this strategy is unsound, the guidance from PINS requires that there should be a reasonable alternative strategy.
44. The Society has been making these points to the planning authority since the local plan review was initiated. In order to make a positive approach to these concerns it made a public presentation on the need and vision for long term planning in the A5 corridor to respond to the Climate Emergency²⁰. It termed this approach “Oswestry 2050”; it demonstrated that the same rate of provision for residential development, if better located could tie the whole area together in a manner which favoured service by modern guided public transport pods of the type now being supported by Government as demonstration projects²¹. The approach was drawn up by an experienced transport planner²². It fully respects and would

²⁰ <https://drive.google.com/file/d/1zDRxDJ-Hs-SJbwR585-K4ec5HbvKAQ6x/view?usp=sharing>; or see separate document “Oswestry 2050”

²¹ <http://rdmgroup.co.uk/rdm-to-lead-driverless-vehicle-study-to-unlock-congestion-in-cambridge>

²² See biographical note at the end of this submission.

implement the policies of the NPPF, paras 102-5 instanced above.

45. In January 2021 the RTPI published a research paper NET ZERO TRANSPORT -The role of spatial planning and place-based solutions²³. The RTPI report is an important document, whose approach is commended to the Inspector. In its executive summary it states:

“The UK needs to rapidly reduce greenhouse gas emissions from surface transport, where very little progress has been made over the last 30 years. This research explores how different places could achieve an 80% reduction in surface transport emissions by 2030, on a pathway to net zero by 2050.

....

The planning system must also look beyond the promotion, allocation and servicing of land for new development. (Comment – this outdated approach has been at the heart of the Local Plan Review) The scale of this challenge requires a truly integrated approach that unites transport and land use planning to deliver place-based visions which meet ambitious targets for trip reduction, modal shift and carbon reduction, alongside other economic, social and environmental objectives. (Comment – Oswestry 2050 represents just such an integrated approach to a place based vision)

.....

Achieving these place-based visions requires a policy framework that puts the reduction of carbon at the heart of decision making, and enables the planning, funding and delivery of the necessary interventions to create genuinely sustainable communities.”

It might be said that the Oswestry 2050 approach is one whose time has come – although perhaps it is more appropriate to say

²³ file:///C:/Users/User/Documents/ZCS/rtpi-net-zero-transport-january-2021.pdf

that it is an appropriate return to an approach abandoned by planning in Shropshire, to the detriment of the necessary move to a low carbon economy.

46. This approach has the formal support of the two major local councils, Oswestry Town Council and Selattyn and Gobowen Parish Council.
47. Unfortunately, the Planning Authority has not given this approach any credence, their only response to the Society being by a portfolio holder that the Council preferred incremental planning to a long term strategic approach, a view not dissented from by senior officers at the time. Nevertheless, the Society contends that a reasonable alternative has been developed in strategic terms.

Conclusion

48. The Society submits that the above evidence is a clear demonstration that the policies within the plan for rural settlement are contrary to the clear expression of the NPPF requiring a move towards a low carbon economy, and to the aims of the plan and its strategic policies, in so far as they purport to respond to the climate emergency. Furthermore the Society has demonstrated that the development and transport needs of the A5 Corridor could be satisfied in a manner which would greatly further the policy requirements of the NPPF and Policy SP3.
49. The analysis presented in this submission is a case study. The study area is typical of the County as a whole. This evidence demonstrates that most rural development is not sustainable, and would not comply with the NPPF or Policy SP3. Paragraph 3.31 of the plan states that there will be *direct and indirect*

interventions to reduce Shropshire’s carbon footprint and improve its resilience to the climate crisis will have the greatest effect will include:.... : Measures which reduce the need or impact of travel such as the planned distribution of future growth

50. In the view of the Society, and as demonstrated by this submission, the distribution of future growth planned in this Regulation 19 Pre-Submission Draft of the Shropshire Local Plan 2016 – 2038 manifestly fails to have the greatest effect in reducing Shropshire’s carbon footprint. It fails to meet Government policy, the plan is not sound, and should not be taken further until a development pattern can be proposed which is compatible with the “move positively towards a zero carbon economy” set out in the Plan’s spatial vision.

David Ward BSc CEng MICE FCIHT

February 2021

Biographical Note

David Ward is a retired Chartered Civil and Transportation Engineer. He was the principal transport planner for the Metropolitan County of Tyne and Wear, and was a Council member of the Institution of Highways and Transportation. Following that he was for 25 years a member of the Planning Inspectorate, rising to Principal Planning Inspector. He was lead Inspector in inquiries into Thameslink 2000 and London Gateway Port, which constituted two out of the three principal UK infrastructure projects of the first decade of the century (the third being Crossrail).

Annex A

Relative amounts of travel comparing Oswestry Sustainable Urban Extension and sites located in surrounding settlements.

Settlement	Distance to main shops x S km	Distance to secondary school E km	Distance to principal service/social centre C km	No of dwellings proposed D	Travel T= D(S+E+C)	Household Travel T/D
Oswestry SUE (1)	0.5 S = 94	2.E=63	1.5.C=257	800	331,200	414
Kinnerley	11.S=2064	11.E=346	11.C=1886	21	90,216	4,296
Knockin	12.S=2251	12.E=378	12.C=2058	30	140,610	4,687
Llanymynech	10.S=1876	9.E=283	10.C=1715	50	193,700	3,874
Pant	9.S=1688	8.E=252	9.C=1543	37	128,871	3,483
Ruyton XI Towns	15.S=2814	1.E=31	15.C=2572	99	536,283	5,417
Trefonen	6.S=1126	6.E=189	6.C=1029	50	117,200	2,344
West Felton	7.S=1313	8.E=252	7.C=1200	66	182,490	2,765
Weston Rhyn	8.S=1500	9.E=283	8.C=1372	100	315,550	3,155
Whittington	8.S=1500	9.E=283	8.C=1372	85	268,175	3,155
Total / average rural(2)				538	1,973,095	3,667
Factor (2)/(1)				0.67 (67%)	5.96 (596%)	8.86 (886%)

A household located in a rural area will make 8.86 times the amount of travel than one located in the urban area; 538 dwellings located in the rural areas will give rise to 5.96 times the amount of travel generated by the 800 dwellings in the urban area.

This table makes estimates of travel for all purposes except commuting and business. It therefore refers to 68% of the travel propensity of an average household. Factors have been applied to give an estimate of trip numbers per household:

$S = 536 \times 0.35$ (from the NTS) $\times 0.5$ (that is half shopping trips to neighbourhood shop, half to main supermarket and town centre shops) $\times 2$ (approx. average household occupancy) = 187.6

$E = 175$ (no of school days pa) $\times 0.18$ (% households having 10-19 year old –from ONS) = 31.5

$C = 536 \times (.17 + .15)$ (From NTS) $\times 0.5$ (that is half of all service and personal trips made elsewhere than Oswestry) $\times 2$ (approx. household occupancy) = 171.5

Annex B

Estimate of additional carbon emissions from dispersed development

1. The Committee on Climate Change advise the government on meeting the requirements of the Climate Change Act 2008, and our international obligations. The Fifth Carbon Budget, to 2030, has been accepted by Government and incorporated into Law.
2. The published “infographic”²⁴ shows what has to be accomplished within the plan period. Household emissions need to reduce from 8.1 tonnes per household in 2014 to 4.5 tonnes by 2030. These emissions represent 40% of national emissions.
3. An estimate of the additional carbon emissions arising from a dwelling situated in a settlement 5 miles away²⁵ from a centre providing main services can be made as follows:
 - 3.1. Suppose that 5²⁶ car trips per week are made to the facilities in the centre. That accounts for 50 miles per week, 2500 miles per year. These trips are taken to include those who go from the dwelling to the centre, delivery trips, and visitors to the dwelling. Some may make more trips, some less.
 - 3.2. New car emissions²⁷ are running at an average of just over 120 gm/km 2015. Applying this gives a carbon emission addition for a rural dwelling of $(2500 \times 100 \times 120) / 60 \times 1000 \text{ kg} = 500\text{kg} = 0.5\text{tonnes}$ per annum. This takes no account of the propensity for rural residents to own SUVs, although some show surprisingly good results – eg Land Rover Discovery 4 as low as 129 gm/km, but Honda CRV up to 179gm/km.
 - 3.3. 0.5 tonnes per annum is 1/9th of the household carbon budget for 2030.
 - 3.4. In addition, para 26 of the submission shows the extent of additional embodied carbon attributable to dwellings sited in a rural area, amounting to 700kg per annum per dwelling.
 - 3.5. The total additional carbon emissions attributable to each rural dwelling is thus 1.2 tonnes – which is 26% of the household carbon budget for 2030.
 - 3.6. The 4000 dwellings so far permitted in Shropshire under SAMdev are likely to be responsible for 4800 tonnes additional CO2 emissions every year compared to those located in a major centre. This is the equivalent of 2400 people making a return flight to New York every year.

²⁴ <https://www.theccc.org.uk/wp-content/uploads/2016/07/5CB-Infographic-FINAL-.pdf>

²⁵ Average distance of settlements in the Oswestry Place Plan Area from Centre = 5.6 miles

²⁶ National Travel Survey Trips per person purposes other than business/ commuting 1.56 perday, or about 11 per household per week. (NTS 0403 - 2019 rates.)

²⁷ <https://www.gov.uk/government/publications/new-car-carbon-dioxide-emissions>

ANNEX C

Rural Transport

My family moved to Ditton Priors in Shropshire in 2002, a village of approximately 850 people. We have access to few facilities with a primary school, one small local store, a butchers, a public house and doctor's surgery. Until 2013 we could travel to the nearest market towns of either Ludlow or Bridgnorth which enabled us to access all other essential services, employment, education, dentists, shopping, hospital appointments, health clinics, opticians, leisure/social opportunities and further transport links.

From the onset a daily bus service 141 Ludlow to Bridgnorth, ran four return trips a day, then later in 2008 the Shropshire Link bus (a dial and ride service) served the area Monday to Saturday. During this time the 141 downgraded and became a school service running one return journey once a day during term time only. In 2013 we lost all public transport servicing our village completely! Since the axing of the Shropshire Link bus and changes to the rules of carriage on the school service 141, Ditton Priors has been effectively 'cut off' from the wider community and other transport links. The impact has been extremely damaging to people who relied on public transport. It is primarily the elderly, young people and those on low wages who are most affected.

The impact has been isolation, and a lack of opportunity to access services and facilities most take for granted. As a non-driver I relied on bus travel to maintain employment. Since the axing of the service I have tried to continue in my employment relying on the goodwill of neighbours and colleagues, but with different work patterns/holidays this has become impossible. There is no longer an opportunity to access employment, training, or the job centre if you do not have access to a car in Ditton Priors. Most recently my husband has had to drive an extra twenty miles per day on top of his commute in order to drop me off at work and to collect me at the end of his day. Although my employment hours ended at 3.40pm I had to wait until 6.00pm for my husband to reach me after his working day.

When my daughter attended secondary school she could not attend after school clubs, GCSE revision sessions, take her Duke of Edinburgh award or drama at GCSE as she had to leave school promptly at the end of the school day, catching the school bus directly home. Her brother, schooled two years previously, had enjoyed participating in all of the above using the Shropshire Link bus to get home independently.

For those without access to a car there is no means of leaving the village. For my family, this meant school holidays were spent at home. My children used to enjoy meeting with friends, using the library, leisure centre, cinema and enjoyed family time visiting places of interest around Shropshire. Once our bus service was axed their only means of

maintaining friendships was through social media. This impacted on the mental health and social development of my children.

Young people in our area must now attend a 'designated sixth form' at post 16 as there is no independent means of travelling to any other college or apprenticeship, restricting choice and opportunity. The six mile walk to the nearest bus stop, which gives access to the rest of the county and all other transport links, is simply too far. My daughter is now studying Museum Practice MSc at Shrewsbury University after gaining a First in Ancient History BA at Cardiff University. All in-person lectures have been accessed by my daughter getting a lift from her father. With no public transport, how long before she will need her own car?

Lack of affordable, accessible, efficient transport options prevents those who relied on a bus service from maintaining health care and hospital appointments. We were promised a 'safety net service', namely community transport options by Shropshire Council, to ensure essential journeys, like hospital appointments, would continue to be met. The experience using such a service has not been positive. On one occasion I received an appointment for cancer screening at Telford hospital. I phoned to book a car with my local community car provider, Bridgnorth community transport, but they had no availability. I was passed to a neighbouring scheme in Broseley which kindly took the booking but on the day they did not turn up. My appointment was missed and cancelled, delaying the testing. Another journey was uncomfortable as the driver did not adhere to speed limits. Returning home from another hospital appointment, I had to sit in a smoke filled car as the driver had been smoking in his vehicle while waiting for my appointment to finish. Community cars can only be booked under strict rules of carriage (hospital appointments) and a charge is made per mile, which in a geographical area like Shropshire can be costly. Pensioners are not exempt from these charges, as there are no concessions or bus pass use. These charges are an obstacle to accessing health care.

Community buses typically run a couple of times a week, with passengers facing long journeys as service users are picked up and dropped off across the county. There is usually only time for a couple of hours for shopping before return journeys have to be made. I recall speaking to an eighty year old lady who had been very stressed that she would be abandoned 10 miles away from home when a dental appointment ran over time. She knew the community bus was due to leave at 12 midday and had rushed in a panic to reach it on time. The 'safety net service' does not work. Community transport has not been invested in, despite public assurances. It is inefficient and poorly resourced in our area and can be costly to the service user.

The decline in rural public transport over the last ten years has likely led to a rise in car ownership and use in Shropshire. During times when we had a regular and efficient bus service my family owned only one car. The difficulties encountered accessing services,

employment and essential journeys have forced me to take driving lessons and purchase a car. This would never have been my choice! In rural areas young people are learning to drive as soon as they reach their seventeenth birthday, and who can blame them? If Shropshire is serious about reducing its carbon footprint it is vital that we have access to a fully integrated and efficient public transport system. House building is on the rise in the county, Ditton Priors has been identified as a community hub which by definition should have good transport links, yet we have no public transport...it's time for change!



Oswestry and District Civic Society

Oswestry 2050

A Vision and Plan for a Sustainable
Future

Looking for the Big Picture



Oswestry 2050

- We said:
 - Oswestry needs a plan
 - Oswestry needs to grow to 35,000 population*
 - Concentrate growth around a tramway on the rail link to Gobowen
- Looking for the Big Picture

*(i) Prof Tony Venables – academic view of minimum size for completeness

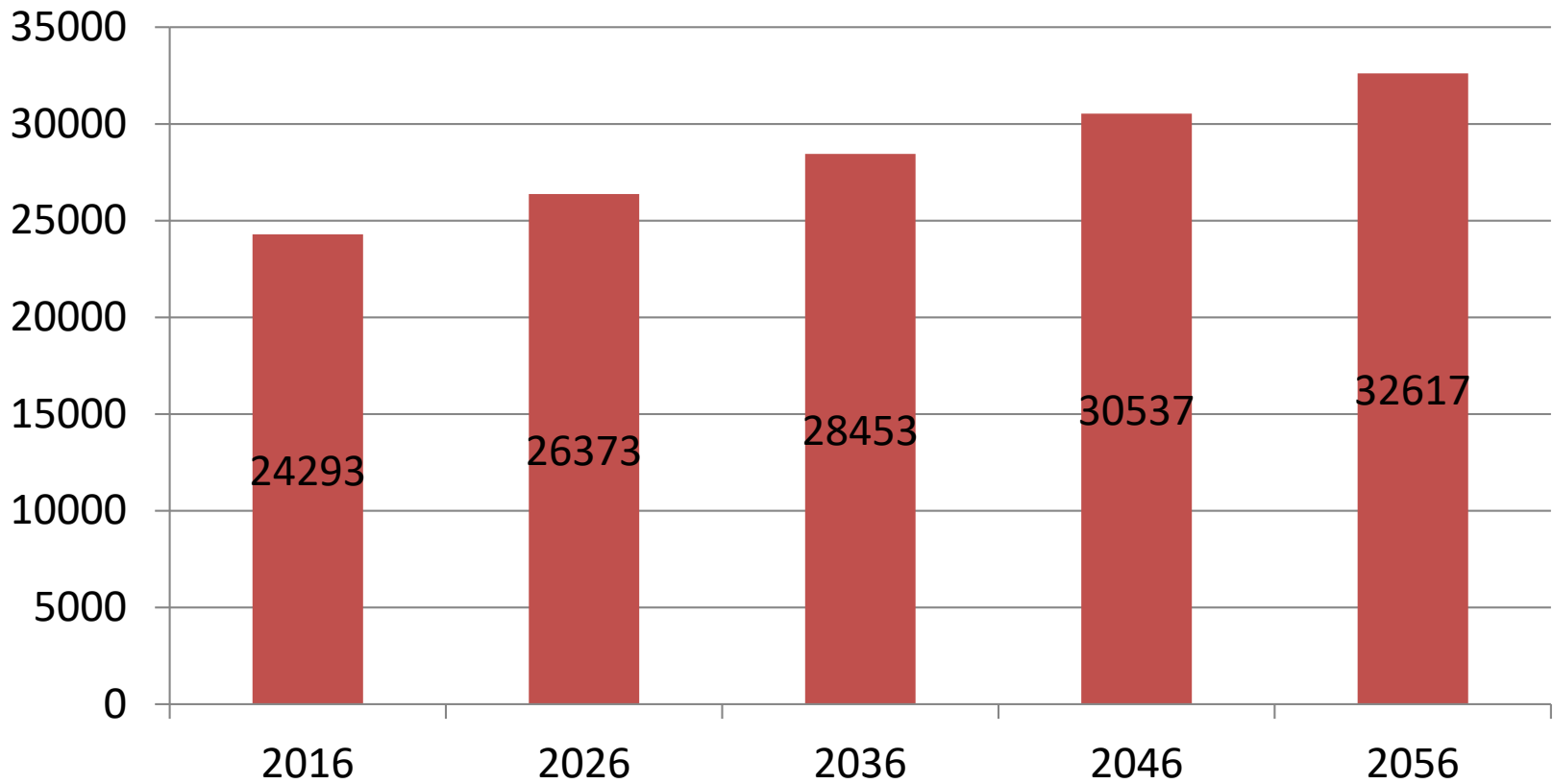
*(ii) Oswestry & Gobowen Place plan population growth 322pa. Applying that to populations in 2011/12 gives 35,728 in 2050



Population Growth

Oswestry, Gobowen and Whittington

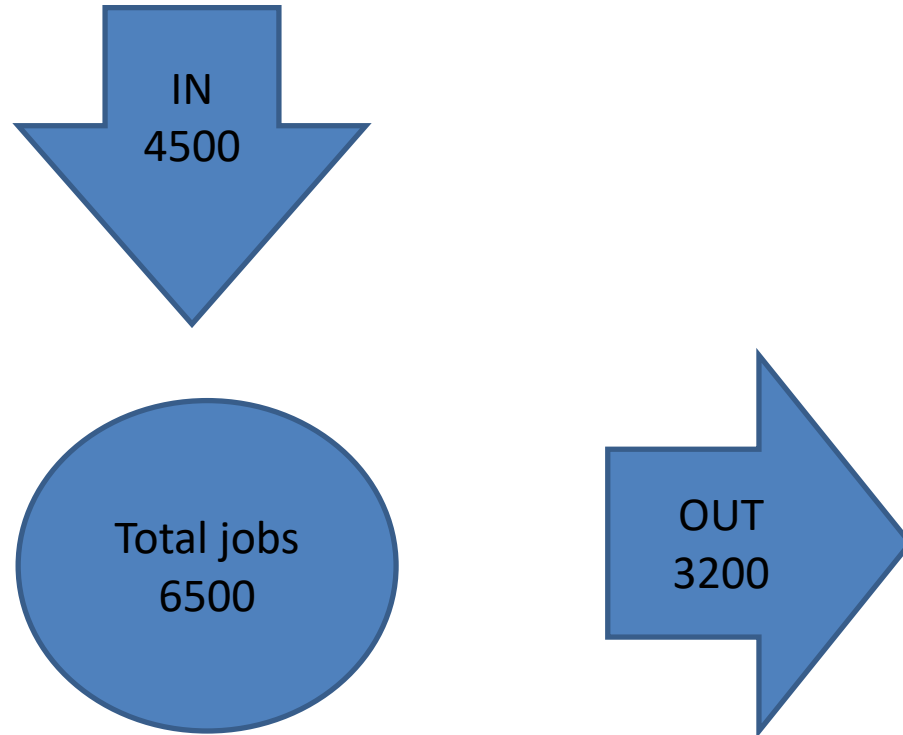
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Oswestry

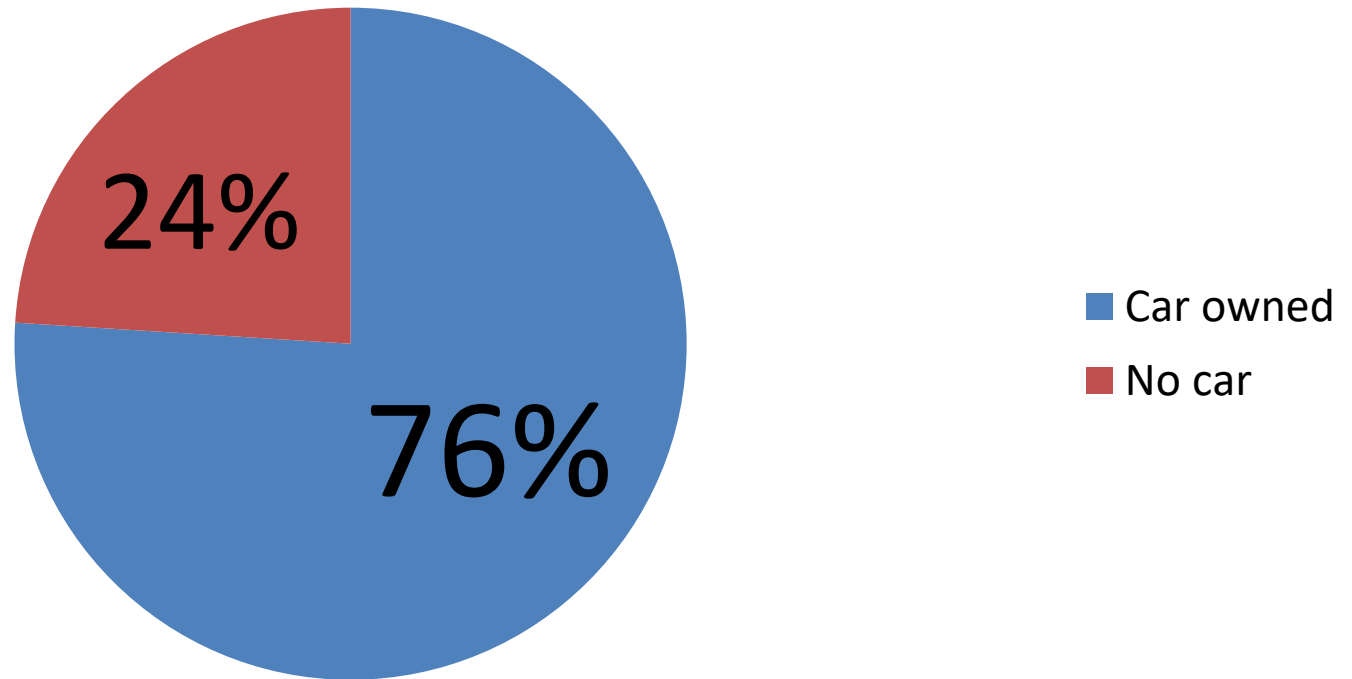
- Commuting





Oswestry

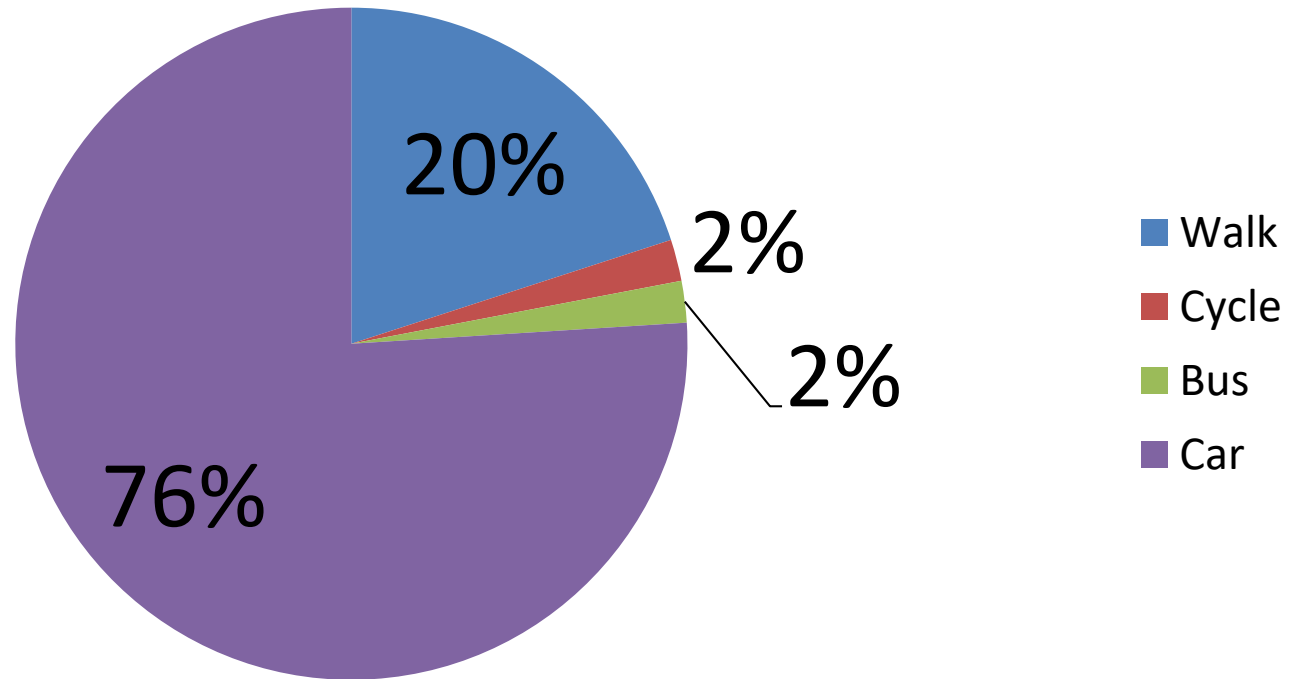
Car availability 2011





Oswestry

Journey to work

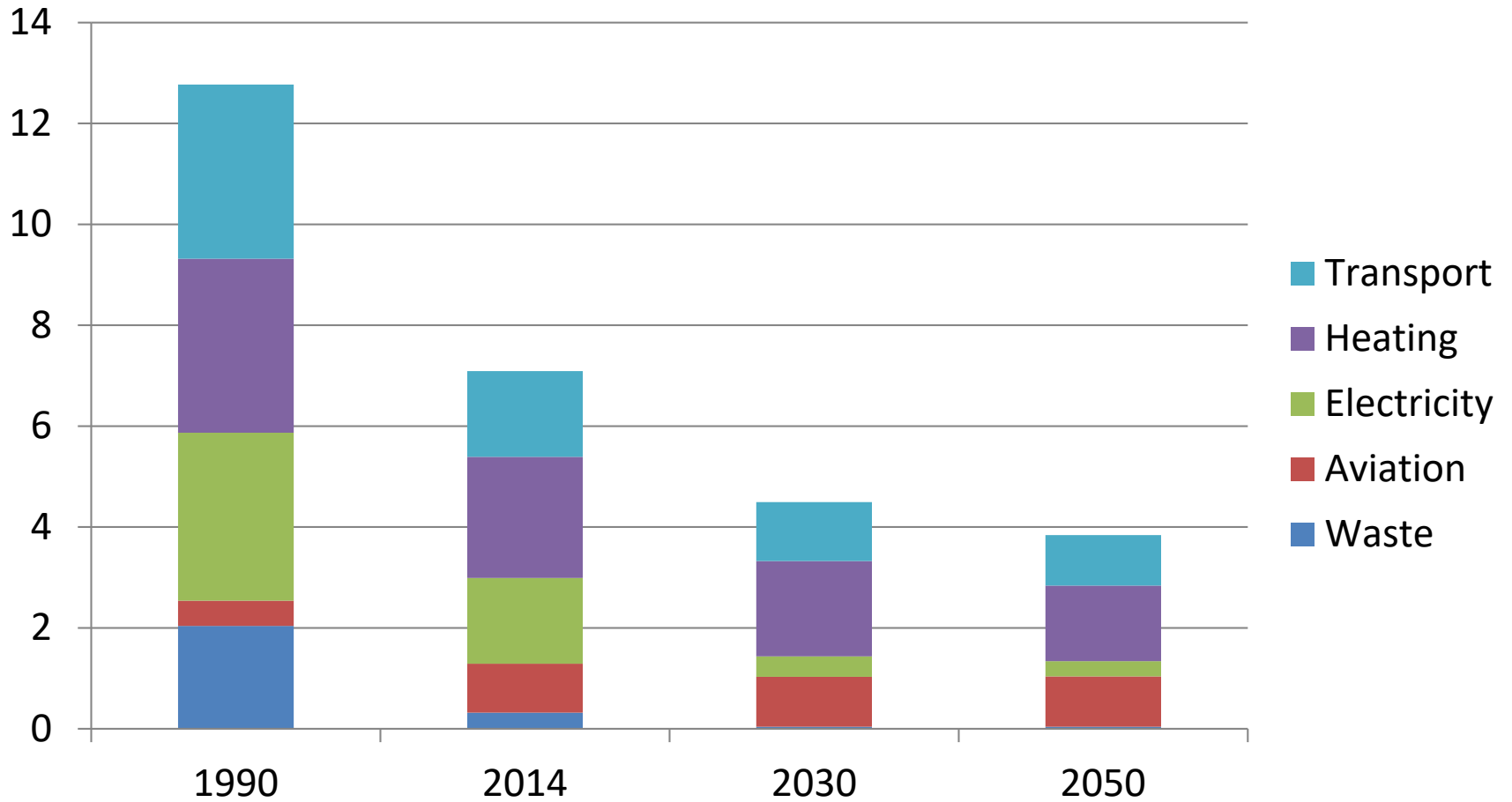




UK Household Carbon Budgets

Committee on Climate Change to 2030

2050 - estimate





Core Strategy – CS3

- The Market Towns ..will maintain and enhance their roles in providing facilities and services to their rural hinterlands, and providing foci for economic development and regeneration. Balanced ..development .. that respects each town's distinctive character and is supported by improvements in infrastructure, will take place ...



Shropshire Local Plan Review

- prioritises investment along strategic corridors and growth zones, utilising existing road and rail connections
- A5 West corridor, including the Principal centre of Oswestry as Shropshire's second largest market town
- **But no Big Picture**

Shropshire Local Plan Review

- Determines overall development requirements
- Asks for site submission proposals
- Chooses “suitable” sites



- No Big Picture; No Big Idea.
- Field by field development - aimless
- Leads to “unconvinced” communities - eg develop near to the Hill Fort, only to meet numerical requirements and landowner aspirations.



Oswestry

Oswestry is the second town in Shropshire – a key Historic Market town and environs

excellent range, with some outstanding successes

- Booka, Upstairs downstairs, Willow Gallery
- 4 traditional butchers, Good restaurant offer
- Notable employers – Lindstrand, Cheese Factory, Clocks
- Livestock mart, and wide range of specialist merchants – construction materials, agricultural, other specialists
- Superb musical offer – Os School Recitals, Whittington Festival, Parish Church Cathedral standard Choir
- Good Niche services – Library, Qube, Kinokulture



Oswestry

- Offers an almost full range of services, with exception of a general hospital
- Town centre stress
 - Empty shops
 - High proportion of charity shops
 - Specialist shops short survival period
 - Reports of declining sales
- Poor public transport provision in hinterland



Oswestry 2020

- Plan produced in 2013, looking forward 7 years
- Identified Weaknesses include
 - lack of clear vision/strategy for the town = **No Big Picture**
 - lack of main line rail link
- Identified Opportunities include
 - Opportunity to deliver balanced and sustainable growth with investment in new and improved infrastructure (and increased levels of local expenditure in the town centre)



Oswestry 2020

- Threats identified include:
 - Increasing competition/attraction of other destinations actively pursuing regeneration strategies
 - SAMdev not fully addressing the need for growth and balanced development of the town as envisaged by the 2020 plan.- **No Big Picture**



Oswestry 2020

- Identified Key issues include
 - The development of the local economy, the promotion of Oswestry as a business location
 - The promotion of Oswestry as a tourist destination and development of the town focussing on its key assets
 - The protection and enhancement of existing open space and provision of new open spaces where required
 - Improving accessibility by public transport, walking and cycling



Oswestry BID

- Business led plan to achieve rapid improvements within the BID area
- Excellent approach.
- Not intended to address long term planning.
- **Not the Big Picture**



Why Oswestry 2050?

- Many desirable changes cannot happen in a 7 year period – Oswestry 2020
- Many desirable changes cannot happen within an 18 year period – Shropshire Local Plan to 2036
- Even if growth is slow it will happen to the middle of the century and beyond.
- So look for the Big Picture



Core Planning Principles

*“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”**

NPPF Paragraph 17

* NPPF Paragraph 17



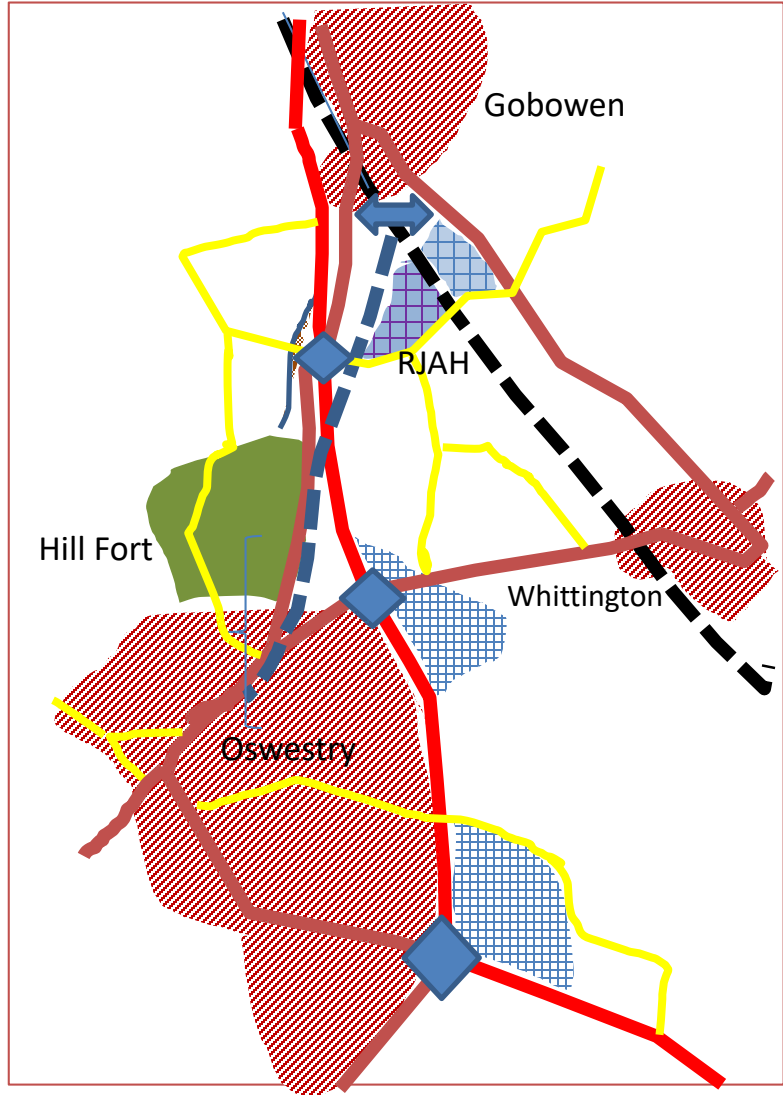
Oswestry 2050 - A Vision

- A town which
 - is more self sustaining, by its supply of goods and services to a wide hinterland
 - makes the best of its assets with a clear social purpose
 - is energy efficient and low carbon
 - is economically vital and attractive
 - strongly favours walking, cycling and public transport
 - is efficiently connected to its neighbours



The Big Picture - Oswestry 2050

- A plan is preferable to haphazard development without a vision for the town
 - e.g. Sustainable Urban Extension lacks any social facility.
 - Future Employment Development poorly connected to residential areas
 - Major employers are poorly connected to residential areas e.g. RJAH
- A good balance may be achieved by concentrating additional development between Gobowen, Whittington and Oswestry



Existing



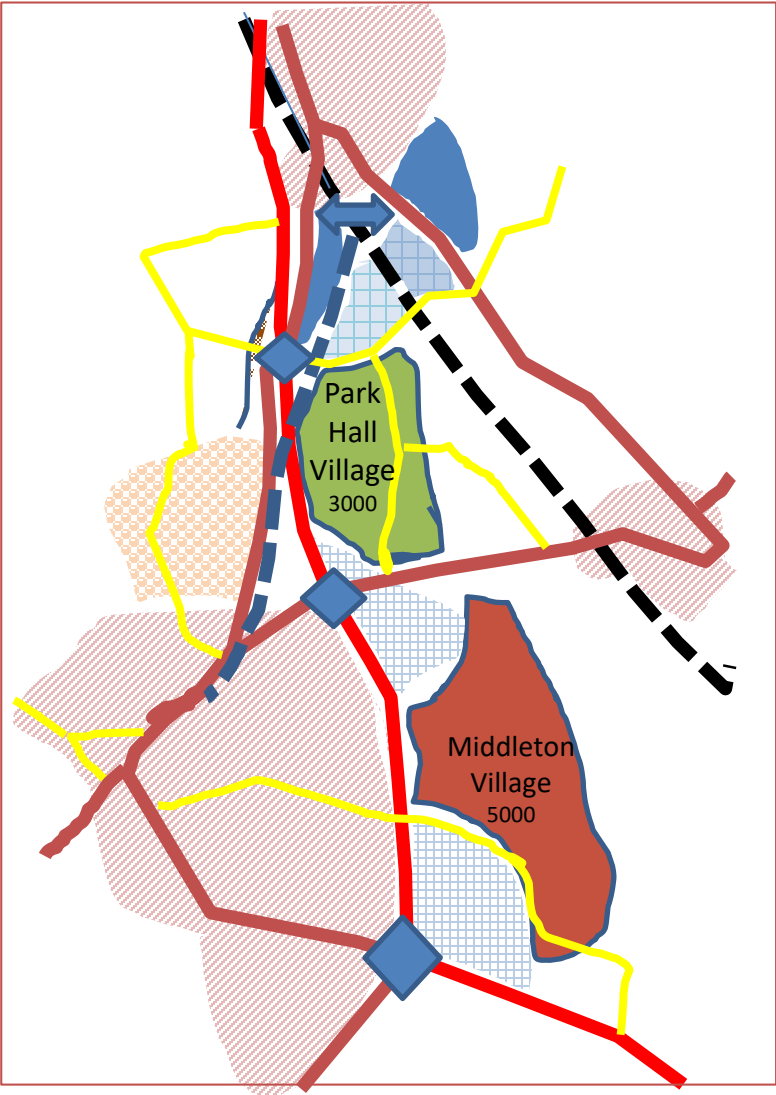
The Big Picture

- Expand the town to support retention of its best shops and social facilities
- Bring existing communities closer
- Improve road access
- Improve rail access
- Include major assets accessibly within the town
 - Hill Fort
 - RJAH Hospital



Oswestry 2050: The Big Picture

- Develop identifiable villages within greater Oswestry, giving a sense of place
- Connect to employment hubs by public transport - Orthopaedic Hospital, Maes y Clawd, new employment sites allocated at Mile End, Park Hall
- Develop new public transport and cycle routes between Oswestry and Gobowen Station



New Villages



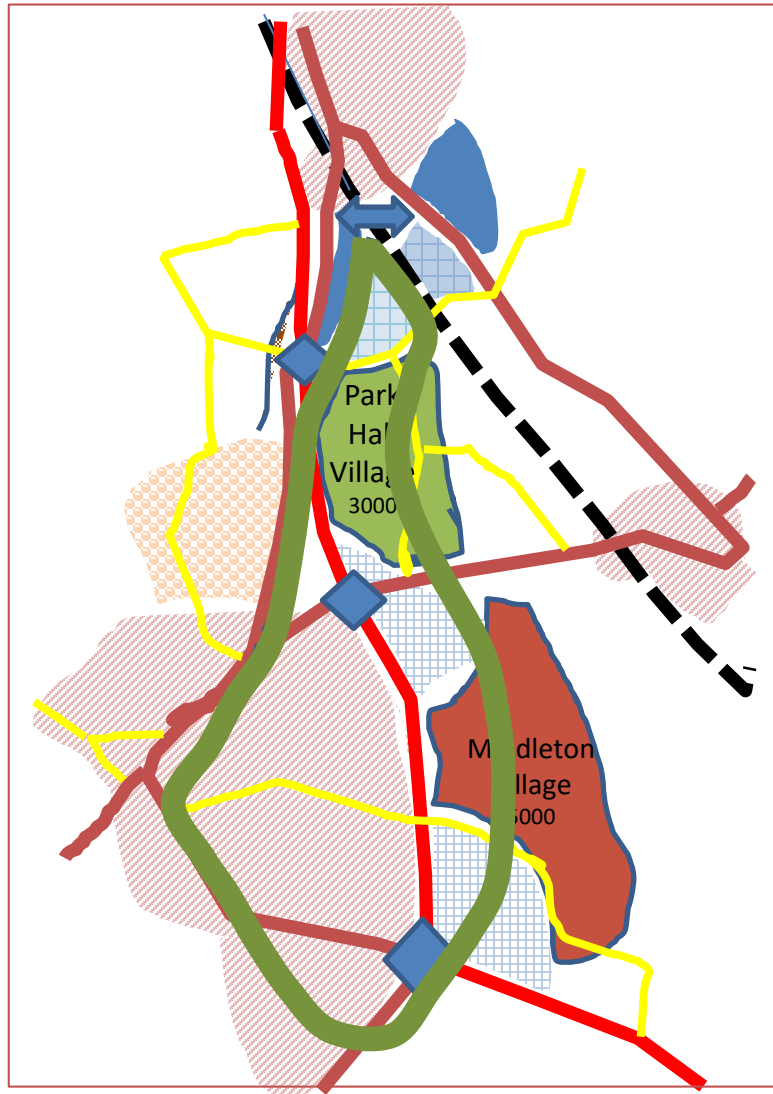
Identifiable villages

- Each with a local centre
- Each a place with a transport hub
- Each a place where it is desirable to live
- Each with its own local recreation or cultural facility
- Community sized place

The Public Transport Link 1

- Connecting employment and residential sites, and the national rail network
- Use the old railway formation between Oswestry and Gobowen, - e.g. the Parry People Mover, already in progress through Cambrian Heritage Railways
- Cycle route





Public
Transport
Loop

The Public Transport link 2

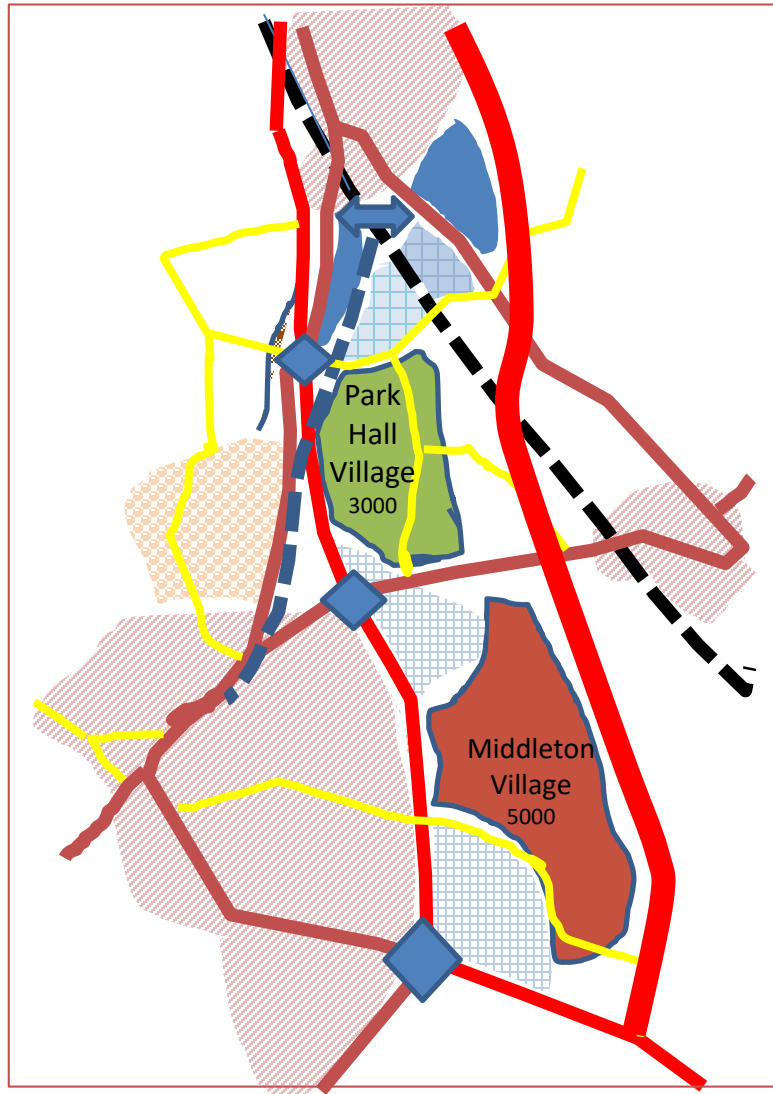
- Return loop via Park Hall, Camp House, Maes y Clawdd. Guided pod or standard bus
- Total length 6-7km
- 15 Minute frequency.
- **Inexpensive**
- Cycle route





The A5

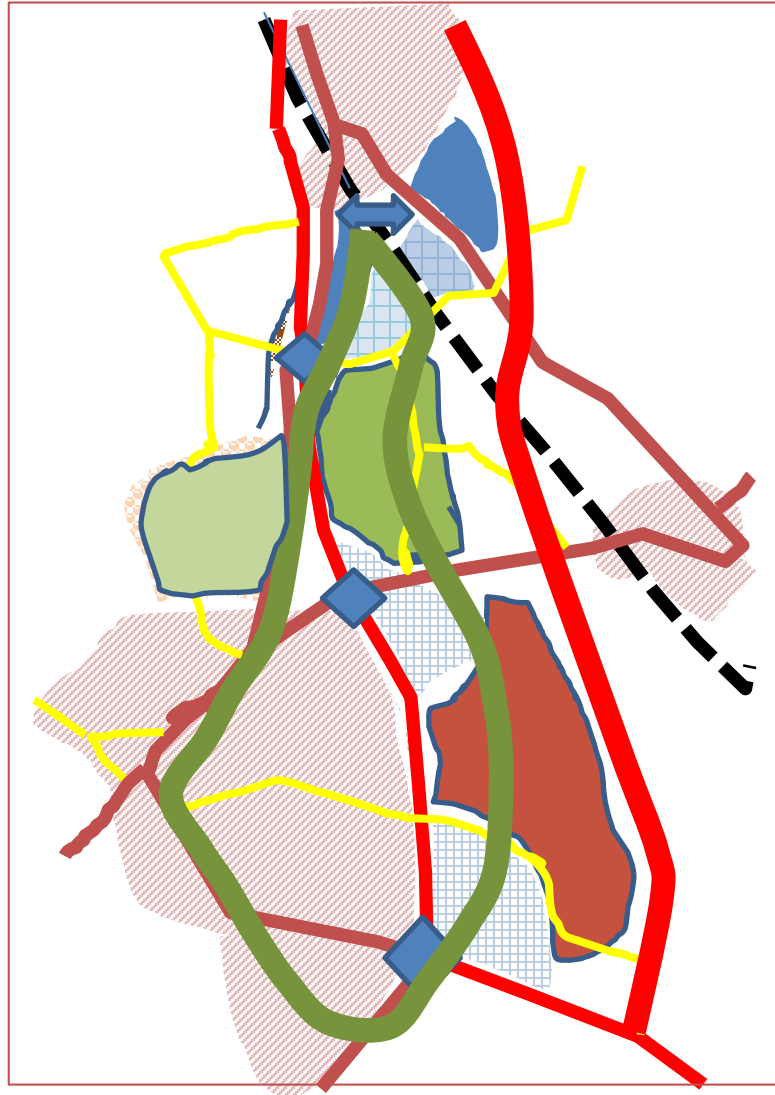
- A5/A483 nearing capacity due to numerous junctions
- Extent of expansion makes it feasible to consider diverting through traffic
- Bypass for A5 only, single carriageway with passing stretches
- Free flowing junctions at North and South
- No intermediate junctions



A5 Bypass

The Big Picture – Oswestry 2050?

- Could look like this – each village connected by good public transport and cycling routes.
- A quality country park including the Hill Fort, protecting its setting, as a tourist destination
- Good rail and road connections, with adequate capacity



Why have a **Big Picture**?

- requires developers to design to include public transport routes
- Makes it more likely for regional programmes to co-ordinate – for example A5 diversion
- Forum for development of local design – eg low carbon areas
- Makes a country park more likely to serve greater population

Summary

- Future generations will have a far better town if realistic plans are made now.
- To go on planning “field by field” is not acceptable.
 - We call upon Shropshire Council to look at

The Big Picture

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Oswestry and District Civic Society
------------------------	-------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="3.35-3.37"/>	Policy:	<input type="text" value="SP5"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>Policy SP5 2 states: Development must maintain and enhancein accordance with national planning policy and the design principles set out in the West Midlands Design Charter. Following paragraphs give explanation.</p> <p>The West Midlands Design Charter is a 2 page document setting out a series of principles. It falls well short of the scope of Government guidance contained in the publications “Government Design Principles” and “Design: process and tools”; and to the extent that it is policy the report “Living with Beauty – Promoting Health Well Being and Sustainable Growth”. As a result this part of the plan is unsound. The Society considers that the WMDC is an aspirational document which gives little firm guidance on design requirements. Furthermore, in Principle 10 it is severely deficient and at odds with Government guidance on Effective Community Engagement in design. Despite the Society having regularly sought commitment to the principles in this guidance, the lpa has failed to institute any procedures to ensure effective community engagement and participation. As a result, major developments have taken place in the Society’s area which have failed to preserve</p>

historic assets; have allowed superstore development in a peripheral location not favoured by the community; and which fails in its design to comply with policies in the NPPF regarding access priority. If the planning authority cannot get it right, public participation in major decisions as advised by Government provides a safeguard.

The wording advised for the policy reflects the requirements of the Guidance on effective engagement, and that contained in Civic Voice “ Collaborative Planning for All”

<http://www.civicvoice.org.uk/resources/collaborative-planning-participation-not-consultation/>

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy should be amended as follows:: in accordance with Government guidance on Design, National Planning Policy and, where compatible with national guidance, the West Midlands Design Charter. Collaborative engagement will be a watchword of public participation in design.

The explanation should be amended to suit, emphasising the need to meet guidance on effective community participation in design.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Office Use Only	Part A Reference:
	Part B Reference:

I wish to state my availability for the hearing session. I consider that the written evidence supplied is adequate for the Inspector to be able to come to a recommendation. Nevertheless, should the Inspector wish to explore matters further, I will be available.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: David Ward

Date: 19/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Local Plan Review - as a material consideration

From the Oswestry and District Civic Society

Local Plan Review

We understand that the Local Plan Review will shortly be placed before the Council for approval as the version which will be submitted for examination by the Inspector. We understand that Members have been informed, correctly, that the draft plan will have gathered significant weight at this stage. We also understand that the development industry can be expected to make many planning applications at this time in order to seek approval to develop sites which are identified within the draft plan.

At this stage however, there are likely to be many objections to the development of at least some of these sites. These objections will have been lodged by members of the public, who have been encouraged to do so by the Council, and who are taking part in what might be termed the most detailed participation in democracy outside elections.

Should permission be granted for an application to develop a site, or sites to which there is an objection awaiting resolution through the inquiry process, granting permission would short circuit the process in a way which would be manifestly undemocratic.

As an example, the Oswestry and District Civic Society and Zero Carbon Shropshire are both objecting that the Hubs and Clusters aspect of the plan is unsound because it conflicts with Government Policy on the move to a low carbon economy. Thus, to permit development in these rural settlements at this stage would short circuit the inquiry process in an undemocratic fashion.

We should be grateful if you would set out how the Council intends to deal with issues of this nature.

David Ward

Planning Adviser to the Society