

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: | |
|------------------------|--|

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"/> | Policy: | <input type="text"/> | Site: | <input type="text"/> | Policies Map: | <input type="text"/> |
|------------|----------------------|---------|----------------------|-------|----------------------|---------------|----------------------|

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

A. Legally compliant Yes: No:

B. Sound Yes: No:

C. Compliant with the Duty to Co-operate Yes: No:

(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 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.

(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:

(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:

Date:

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Council :
Shropshire Local Plan
Representation Form

Part B Representation – Jack Parry

Question 4 (Continued)

...include reference to “minimising environmental impact”.

However the implementation of these aims and policies is undermined by the ways in which the Plan has failed to properly account for the impact of the proposed new housing. For example, under para. 3.40 in the section on Climate Change (SP3) there is a requirement, quite properly, for all planning applications for new development to set out how they comply with Policy SP5 relating to design – but there is no similar requirement to show how new housing policies should comply with Climate Change policy SP3. This is a major failing of the Plan, which is further evidenced in the Sustainability Appraisal document in which the different levels of housing growth are considered against the 16 Sustainability Objectives; in particular SO12 (reducing CO2 emissions) and SO13 (Adapting and mitigating climate change).

Table 1.1 identifies *no significant impact* on either of these Objectives by the building of up to 30,800 houses over the Plan period, nor does it show *any impact* of such growth on the overall Climate Change Policy SP3. Surely this cannot be right, given that the Institute of Labour Economics calculates that the average CO2 emissions from a single dwelling in the UK is 20.2 tonnes per annum, which does not include ancillary household activities such as transport?

On the basis of these calculations the 30,800 houses proposed in the Plan would generate 622,160 tonnes of CO2 per annum. The Climate Change Strategy in the Evidence Base quotes the total CO2 production for Shropshire as 1.76 million tonnes. It can be clearly seen what a huge additional proportion of CO2 would be generated in the County by these housing volumes when the declared aim of the Council is to be carbon neutral by 2035 and carbon zero by 2050.

The conclusion must be that the draft Plan has failed to address the impact of its housing growth figures on the CO2 and Climate Change policies and statements in the very same Plan. Including worthy policies and declaring a Climate Emergency becomes meaningless in these circumstances.

Given the gravity, enormity and speed with which the climate crisis is facing us all, the Council must re-examine the scale of its proposed housing development and justify how such a scale is compatible with its policies and objectives on climate and the environment.