

Shropshire Local Plan Draft Review Document – Commentary by Shrewsbury Civic Society - February 2021

The 330+ page document is helpfully broken down into usable sections.

Section 2 is the Introduction that puts the Plan in context. After this consultation, it will go for inspection by a Government Inspector and could be in force in early 2022. However, its timing is very unfortunate as the Government's new White Paper "Planning for the Future" has many aspirations to simplify these plans and make them more specific. If translated into law, these ideas will quickly render the Plan out-of-date. The main changes would be: a drastic shortening of the Local Plan; identification of all land as "Protected", "Re-development" or as "Growth land", where planning permission is not needed; more early stage public consultation; less high level aims; and more specific locally agreed 'design codes'. There is little in this current review suggesting movement towards these coming changes and this is a lost opportunity.

Meantime, the NPPF still applies (although with pending amendments) and this Local Plan has been extended to cover up to 2038. (2 more years than the last draft.) The Plan also includes the Shrewsbury Place Plan and economic growth appears to be the main policy driver. The number of new homes planned for Shrewsbury has also been raised to 8625 (representing another 28% of population). This is some 11% greater than the Government requires although new housing need systems are about to be implemented nationally. These may re-configure governmental requirements upwards for Shropshire, if the White Paper takes effect.

Section 3 outlines strategic planning development policies.

The first (**SP1**) is called "The Shropshire Test" – an idea taken from the Big Town Plan that identifies 7 main aims that developments should meet. (for example: "*Supports the health, well-being and safety of communities*") This is meant to "*give a clear indication of the high standards the Council will seek....*" 10 are now identified in the Government's "Planning for the Future" document. However, the document assumes that the 7 principles will be taken into account by developers seeking planning permission in Shropshire. The principles appear very open to interpretation and consequently unenforceable.

SP2 discusses issues such as different parts of Shropshire, proportions of 'affordable' homes and the growing number of Neighbourhood Planning towns. Neighbourhood plans are agreed only after local referenda and eventually gain legal force. Shrewsbury does not have a Neighbourhood Plan but the Big Town Plan is providing planning strategy, although there will be no referendum. Consequently, considerable additional public consultation is enabling townspeople to be involved through many means that are not echoed in the Local Plan's sister draft policy on Community Involvement. (CSI)

SP3 addresses issues concerning Climate Change. However, while Shropshire Council has agreed a "Climate Emergency" and has a partnership seeking ways to reduce CO2 emissions, this is hardly mentioned in SP3. It is notable that several experts in the field have assessed this Policy as inadequate to provide zero emission by 2036. This is already given attention within the NPPF in terms of sustainability, but now needs much stronger detailing about CO2 emissions, including construction methods, materials and future energy use.

SP4 seeks to address issues of Sustainable Development, which in the NPPF has three aspects: Visual, Social and Environmental sustainability. These are not identified in the Draft Local Plan and so it lacks the detailing that might prompt better sustainable living for future residents.

SP5 is seeking to "*ensure the creation of better places*" through "*High Quality Design*". It adopts the West Midlands Combined Authorities Design Charter which is a well-drafted set of over-arching principles for designing developments. There are some 14 principles (eg "*Opportunities for solar gain are maximised where possible*".) Planning applications are meant to set out "how the principles have been considered". These requests lack

specificity and exemplification and consequently the Charter failed in the quest for better design. (eg An application to develop a site off the A49 to the town's North end, cited the Charter's words and stated that the principles were met but the proposals are mediocre, predictable and lack distinctiveness. The application for a housing development near to the Churncote Roundabout, similarly Self-Evaluated the questions of the "Building for Life 12" appraisal, stating that all were fully met. However, this application has been heavily criticised for not meeting all the basic requirements of new developments for future living.)

Shropshire's own voluntary Accreditation Scheme was not effective in raising design quality, despite having a similar set of design criteria to BfL12. It would seem that design guidance must include **enforceable rigour**, if Shropshire is to improve building quality. The White Paper "*Planning for the Future*" also seeks much firmer guidance, following on from the report of the "*Building Better – Building Beautiful Commission*". Planning reforms are likely to require Local Plans to be shorter, more specific and to include unambiguous "Design Codes". The recent "National Model Design Code" attempts to show how to devise a Design Code and to re-iterate the expectation that LPAs will develop them. (A Design Code is defined as; "*A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code, should build upon a design vision, such as a masterplan or other design and development framework for a site or area.*" p.4 National Design Guide MHCLG, Oct. 2019)

Now is the time to elevate standards by robustly wording policies to **ensure** they have real lifetime impact.

DP 24 seeks to conserve and enhance designated and non-designated heritage assets. This policy recognises the importance of Shropshire's heritage assets. However, it too lacks the specification or illustration that is needed to clarify issues such as degrees of harm to an asset and loss of significance. It states how proposals that will deliver positive benefits to heritage assets will be supported. However, it lacks a facility for robust refusal where harm will affect the asset and instead discusses mitigation measures. Nevertheless, there is reference to more detailed supplementary planning guidance.

However, **S16 the Shrewsbury Place Plan** makes only passing reference to the Town's highly unusual architectural and heritage richness. This Place Plan has categories concerning housing development, retail improvement, industry and employment, etc., but none for heritage enhancement or protection – the very aspects that make the town an enduring visitor destination. This is in spite of the fact that Shropshire Council owns several of the town's heritage asset buildings that are in poor repair.

In a previous version of the Local Plan, **housing allocations** for the town of Shrewsbury took account of the Big Town Plan's aspirations of "Balanced Growth" and how there were opportunities for many homes within the very centre. There had been an allocation of some 1400 new homes that would effectively be "windfall" homes reducing the overall need for the Shrewsbury Place Plan. The latest version of the Big Town Plan estimates a possible **1904 units** just for the master-planned Centre. It takes no account of the areas between the centre and the fringe estates but some of these would reuse existing buildings with retro-fitting and so contribute to the Council's Climate Emergency aims. A similar over-allocation may be made for employment provision, especially when there is likely to be some a reduction (20%) in demand for office space, since the pandemic, etc.

Many of the **fringe sites** allocated for housing, were already in previous version of the Plan. However, experience suggests that communities are very concerned about the **quality and facilities they provide**. Many recent site applications provide insufficient quality in terms of access, community provision (shops or etc), energy efficiency and distinctiveness of building design. We have seen how such features can be required only if they are entered into the site allocation plan. New trends of home-working and green travel suggest that larger estates will need considerable upgrading of local facilities. This needs addressing in the Plan now. Without such basic facilities generations are being relegated to inappropriate places to live.

SHR 145 is an unwelcome addition to Schedule S16.1 (i) and we have had both pre-app talks and objected to a planning application here. The site could have several other uses but it is inappropriate for a small housing estate.

This is because it would be 'islanded' without easy access routes apart from heavily used traffic roads. We think it is a suitable site for development but not for homes. The allocation of 150 dwellings may be found within the large, unaccounted "windfall" developments, likely to be made available from Big Town Planning and from the additional "windfall" dwellings created out of the town centre but not at urban extensions.

SHR173 is a puzzling addition to the allocated development sites, ostensibly for 500+ houses. Our concerns about the sufficiency of facilities on fringe estates (as above) are not fully met in plans for this site. We presume that the fact that this site is listed as dependent upon the NWRR, is due to possible additional pressure on Ellesmere Road. Earlier conclusions about traffic were questionable concerning congestion along Ellesmere Road. The data that drives those conclusions is now dated and needs re-assessment, due to additional pressure on the Coton Hill Junction, and from several more recent developments along the road, as well as pandemic-driven changes. Up-to-date, evidence-based forecasts are necessary.

Main Points where the Draft Local Plan needs improvement

- The speed of housing growth is too fast for Shrewsbury. It is highly unpopular and infrastructure is lagging well behind. Without the requirement to co-operate with neighbouring LAs, a reduction (with pro-rata area reductions) in housing numbers is possible. A further extension of the Plan period could help too. The Plan allocates too many houses to be built in Shrewsbury and reduction are possible in the light of BTP "windfall" homes and re-use of a greater number of buildings in and around the town.
- The Local Plan lacks wording that is specific enough to enforce a high quality of development design. A Design Code is needed for Shrewsbury that would provide certainty for developers of BTP Projects.
- Shrewsbury residents have few chances to have a say and systems prompting involvement are dated. More of the engagement methods of BTP should be included in the SCI.
- The Plan timetable is unfortunate in its timing concerning impending National changes to the Planning system and may require major re-adjustments soon. Including elements of coming changes, eg categorising land allocations, will provide greater confidence for developers and others.
- Even without the possible implications of the White Paper, the Local Plan fails to show the influence of other changes, eg Permitted Development Rights, Public Consultation (eg the belated SCI), and the trends indicated in the Government's National Design Guide, BBBBC's Living with Beauty and the new National ave
- The Plan should provide more detail for allocated development sites in terms of meeting sustainability. For example, more estates need basic facilities such as a shop, community centre, medical facility, green transport routes, energy efficiency and high quality distinctive design.
- New data collections are needed to more accurately assess traffic forecasts for the main routes into Shrewsbury. Only then can infra-structure plans be considered and the viability of development sites.