

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:	Shropshire Climate Action Partnership
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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:	<input type="text" value="The whole plan"/>	Policy:	<input type="text"/>	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.

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The Planning and Compulsory Purchase Act (section 19) and the NPPF (Paragraph 148 – 149, incorporating footnote 48) require Local Plans to be carbon audited, and to “contribute to radical carbon emission reductions in line with the Climate Change Act” (which itself commits us to reducing emissions to net zero by 2050). Paragraphs 1 and 7 of the online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government provides further detailed interpretation of the NPPF requirements. The details are summarised in a [legal briefing](#) from the Royal Town Planning Institute, Client Earth and the Town and Country Planning Association. <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=4927d472-a9f0-4281-a6af-463ddc642201>

We agree with the legal briefing that Local Plans are required to demonstrate how their policies are

in line with the legally binding carbon emission reduction targets in the Climate Change Act. In summary, local plans are to:

- Take into account baseline emissions
- Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios
- Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050.

The evidence base should provide an overall carbon budget for the County to 2050, consistent with the updated Climate Change Act. It should show baseline emissions and the impact of development and mitigating policies on this emission curve. The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal. To the extent possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years.

The Shropshire Local Plan sets out no carbon budget.. References to reducing carbon emissions are general rather than objectively measurable as required. Therefore, in the light of the legal opinion given above, the plan is not sound in terms of its climate change mitigation policies and duties.

Where local authorities have followed the process of carbon auditing their plans set out in the NPPF and Planning Practice Guidance, the conclusions are often that it would be very difficult to achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. Thus, following the process set out in legislation, planning policy and guidance to the letter will support the need for very ambitious planning policies around building performance. Such an approach also provides evidence to support proactive and supportive renewable energy policies as essential to carbon emission reduction.

Taking this additional step should help the council align its local plan with its climate emergency declaration, and provide evidence to support the development and adoption of stronger planning policies.

(Please continue on a separate sheet if necessary)

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The plan should be subject to a carbon audit. To the extent that this indicates that the plan may not be following the trajectory to zero carbon, it should be modified and resubmitted.

(Please continue on a separate sheet if necessary)

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Signature: A. P. Wilson

Date: 25/02/2021

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Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

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Paragraph: Policy: Site: Policies Map:

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- (Please tick as appropriate).

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Policy DP11 is not sound because it will not achieve the stated carbon emission reduction objectives.

Amendments are proposed that will enable the policies of the council overall to achieve the stated objectives in terms of the carbon performance of developments.

Evidence will be presented that demonstrates that the council is able to make its policies sound by the proposed amendments.

(Please continue on a separate sheet if necessary)

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Please add the following to DP11:

Energy use in new development

Development will be expected to:

1. Minimise the demand for heating, cooling, hot water, lighting and power through energy efficiency measures; then
2. Meet its remaining heat/cooling demand sustainably, as set out below; then
3. Maximise on-site renewable energy generation; and then
4. Meet any outstanding reduction in residual emissions through carbon offsetting.

Development will be expected to achieve:

1. A minimum 10% reduction in regulated CO2 emissions through energy efficiency measures; and
2. A minimum 35% reduction in regulated CO2 emissions through a combination of energy efficiency measures and on-site renewable energy generation.

After applying on site measures, development is expected to achieve a 100% reduction in its remaining regulated and unregulated emissions through the use of carbon offsetting as set out below.

New development should demonstrate through an Energy Strategy set out as part of its Sustainability Statement how these requirements will be met. Where existing buildings are being converted into new uses and it is not feasible for the full CO2 emission reduction to be met, the Energy Strategy should show that energy demand has been reduced to the lowest practical level using energy efficiency measures, heating/cooling systems have been selected sustainably and that on-site renewable energy will be installed where feasible, aiming for a 20% reduction in regulated CO2 emissions on site and exceeding this whenever possible.

Carbon offsetting: financial contributions and other allowable solutions

Once on-site CO2 reduction requirements for energy efficiency and renewable energy measures have been met, the remaining emission reductions will be met by carbon offsetting measures such as:

Providing the residual emission reduction through a financial contribution to renewable energy, low-carbon energy and energy efficiency schemes elsewhere in the Shropshire area;
or
Agreeing acceptable directly linked or near-site provision.

The financial contribution required will be equivalent to the cost of mitigating the residual CO2 emissions off-site, at a rate of £95 per tonne of CO2 that would be emitted over a period of 30 years.

PassivHaus buildings

Where buildings are proposed to be certified PassivHaus standard, the % CO2 reduction targets above relating to energy efficiency measures, on-site renewables and Allowable Solutions will not need to be met. In these cases, a full Energy Strategy will not be required and it will be sufficient to submit the technical information required to demonstrate that the PassivHaus standard can be achieved and for the Sustainability Statement to demonstrate that the residual heat/cooling demand for the development has been met sustainably as set out below.

Heating and Cooling Systems

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New development will be expected to demonstrate through its Energy Strategy that the most sustainable heating and cooling systems have been selected. This should include consideration of the proposed system as a whole, including the impact of its component materials on greenhouse gas emissions.

New development will be expected to demonstrate that heating systems have been selected in accordance with the following approach: Where possible, connection to an existing classified heat network or a new classified heat network from the point of occupation; Where it is likely that existing or proposed heat networks will grow, designing development with a communal heating system which could connect in the future; Elsewhere, employing sustainable alternatives to heat networks such as individual renewable heat or communal renewable/low-carbon heat. New development will be expected to demonstrate that cooling systems have been designed in accordance with the following steps:

1. Minimise excessive solar gain through orientation, built form, massing, fixed, mobile and seasonal shading and green infrastructure; then
2. Maximise passive cooling through natural ventilation, diurnal cooling, placement of thermal mass and green and blue infrastructure; and then
3. Meet residual cooling load renewably, and consider opportunities for seasonal cooling/heating.

(Please continue on a separate sheet if necessary)

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signature:

A. P. Wilson

Date: 24/02/2021

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Part A Reference:

Part B Reference:

Representation Form

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

Paragraph:	<input type="text" value="4.126"/>	Policy:	<input type="text" value="DP12"/>	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:

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| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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- (Please tick as appropriate).

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4.126. Where loss or damage to an asset is likely then all reasonable alternative methods of delivering the proposal should be considered. If no solution can be found, through use of an alternative site or redesign to avoid harm for example, and the demonstrated social or economic benefits of the proposed development clearly outweigh the harm to that asset, then mitigation and compensation measures will be sought through planning conditions or planning agreements.

(Please continue on a separate sheet if necessary)

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The ecological emergency and loss of nature is as significant as climate change, and the importance of this is not recognised by the policy and the plan overall. The natural environment keeps us alive and is vital to people's health and wellbeing as well as supporting the economy. Development needs to support nature recovery, not just 'avoid harm' as the policy says.

(Please continue on a separate sheet if necessary)

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Signature:

A. P. Wilson

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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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)

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Paragraph: Policy: Site: Policies Map:

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A. Legally compliant Yes: **y** No:

B. Sound Yes: No: **n**
no

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

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DP 23 Conserving and Enhancing the Historic Environment

Clause 1(g) Policy SP3 promotes fabric energy efficiency retrofits of existing buildings yet no support is given for the responsible energy retrofitting of historic and listed buildings within policy DP23.

As a predominantly rural area, Shropshire has a large stock of poorly insulated buildings. In meeting the council's climate emergency declaration, reducing carbon emissions from existing building stock is at least as significant as ensuring that new development is zero carbon. Therefore text should be added similar to the following:

It would be beneficial to develop supplementary planning guidance setting out how homeowners could improve the energy efficiency of their own homes without detracting from their heritage significance.

The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy. The policy will be supported by the Council's Sustainable Construction and Retrofitting Supplementary Planning Document.

(Please continue on a separate sheet if necessary)

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SP3 1.g in relation to SP 23 should have the following addition paragraph made:

8. The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy framework.

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A. P. Wilson

Date:

24/02/2021

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DP26 is not sound because, whilst the policy does mention a wide range of forms of renewable energy, it is really just a list of negative impacts which renewable energy developments could give rise to, rather than a positive strategy which maximises the potential for development as required by the NPPF (para 151). Furthermore, it is clear that the policies as drafted will not achieve the low carbon transition intended. In order to achieve the net zero carbon Shropshire objectives and also to achieve the minimum objectives for renewables set out in Government policy it will be necessary for considerably greater ambition to be enshrined in council policies.

The Climate Change Act means that we must entirely phase out fossil fuel energy entirely within the next 30 years if not sooner, and in addition Shropshire Council policy is to achieve net zero carbon Shropshire by 2030. As a result of this and the need to also decarbonise (and therefore electrify) heat and transport, [renewable electricity generation must quadruple from current levels](#) to meet these demands. The policy as currently worded does very little to bring about this increase in deployment.

Shropshire Council is currently supporting mapping of the deployable renewable energy resources across the region and will develop more detailed policies identifying these (with maps identifying potentially suitable areas for development), with clear criteria for the assessment of planning applications, and encouragement for developers to take up these significant opportunities for the development of the Shropshire economy and self-sufficiency in energy by 2030.

Shropshire council is also giving specific encouragement to community energy projects, as suggested by the NPPF (para 152) which states that Local planning authorities should support community-led initiatives for renewable and low carbon energy.

The policy needs to match Shropshire Council intentions by reference to the positive contribution of renewable energy to meeting our carbon reduction commitments and to the potential benefits of renewable energy in terms of economic development.

(Please continue on a separate sheet if necessary)

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Please delete the draft wording of DP26 and replace with the following:

DP26 Renewable and low carbon energy generation

Decentralised renewable and low carbon energy schemes will be supported and encouraged, and will be approved where their impact is, or can be made, acceptable.

In determining applications for renewable and low carbon energy, and associated infrastructure, the following issues will be considered:

- a) the contribution of the proposals, in the light of the Council's pledge to be net zero carbon by 2030, to cutting greenhouse gas emissions and decarbonising our energy system.
- b) the impact of the scheme, together with any cumulative issues, on landscape character, visual amenity, water quality and flood risk, heritage significance, recreation, biodiversity and, where appropriate, agricultural land use, aviation and telecommunications.
- c) the impact on users and residents of the local area, including where relevant, shadow flicker, air quality, vibration and noise.
- d) the direct benefits to the area and local community.

Ground-mounted solar energy developments are more likely to be supported in areas identified as suitable in principle as set out on the maps currently under development on behalf of the council and their partners in Shropshire Climate Action Partnership. Outside these areas, applicants will need to provide a clear justification for the suitability of the chosen development site for solar development at the relevant scale.

Proposals for renewable energy proposals within the AONB will be encouraged, however, where development proposals will affect the AONB, the benefits of development must demonstrably outweigh any harm to the designated area or its setting.

Additionally, proposals for wind energy development:

- a) should be located within a suitable area as indicated on the Policies Map;
- b) are more likely to be supported if they fall within Landscape Character Areas of lower sensitivity to the relevant development scale;
- c) may also be suitable in principle if they are located in large new development sites, existing industrial estates or if they are proposed in neighbourhood plans or through community energy schemes; and
- d) it can be clearly demonstrated that the scale of the development is
- e) appropriate to the site and the regions energy needs, the benefits of the development outweigh any
- f) harm to the local community, and that the development complies with
- g) the relevant criteria

Where appropriate, provision should be made for the removal of the facilities and reinstatement of the site should it cease to be operational.

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Particular support will be given to renewable and low carbon energy generation developments that are led by, or meet the needs of local communities, and where this supports the development of local employment and the economy.

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership

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: no | No: No |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/>
no |
| 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.

The policy is not sound or legal because it does not comply with government policy and will not achieve stated council objectives for net zero carbon Shropshire by 2030, or the longer term objectives of the Climate Change Act (2008)

Decarbonising Transport¹ sets out the government's proposals for de-carbonising travel, including absolute reductions in car trips, making public transport and active travel the first choice for daily activities and providing EV charging infrastructure. It is clear that this has not informed the council's draft policy proposals, which need revision.

Further government policy set out in 'Gear Change' proposes "*A travel revolution in our streets, towns and communities will have made cycling a mass form of transit. Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030.*"

Gear Change states: "*Cycling is or will become mass transit and must be treated as such.*" This encapsulates the changed approach we need to adopt to cycle infrastructure provision. Local Transport Note 1 / 20 - Cycle Infrastructure design² details how these principles should influence cycle infrastructure design.

The [RTPI](#) have advised that to align with the net zero commitment, the local plan should:

- set ambitious requirements for trip reduction, mode share targets and 'zero carbon' outcomes
- prioritise urban renewal that enables growth while reducing travel demand.
- maximise the potential for local living so people can meet their needs by walking and cycling
- All new development to be located and designed to generate zero transport emissions
-

1. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdfhttps://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/9

(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.

Office Use Only
Part A Reference:

Part B Reference:

Please add the following amendment to the policy draft:

All highways policies will be amended to reflect the shift in priority from car to cycling and walking, and seek the introduction of low traffic neighbourhoods across all of Shropshire's towns and villages where suitable.

Major development shall incorporate or fund the provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure commensurate with the scale of development and trip generation

Elsewhere across the existing highways network a priority and suitable ringfenced budget will be given to modifications to highways to incorporate suitable cycle infrastructure and incorporate measures such as default 20mph speed limits in urban areas to reduce road hazard and encourage cycling and walking.

All infrastructure for cycling routes will be designed in accordance with Local Transport Note 1 / 20 - Cycle Infrastructure Design. Cycling is or will become mass transit and must be treated as such.

(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:

To emphasis the requirement of these changes to the plan	

Office Use Only
Part A Reference:

Part B Reference:

(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:

A. P. Wilson

Date: 24/02/2021

Office Use Only
Part A Reference:

Part B Reference:

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:	Click or tap here to enter text.
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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:	<input type="text" value="23.1"/>	Policy:	<input type="text" value="SP1"/>	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.

Please see attached response sheet for question 4

(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.

See attached response to Q.5 below

(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:

It is essential that the examination fully appreciates the implications of the Declared Climate Emergency on the subsequent interpretation and implementation of the wider Shropshire Local Plan

(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:

A. P. Wilson

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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:	Name and Organisation Shropshire Climate Action Partnership
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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:	1 - 7	Policy:	DP26	Site:		Policies Map:	
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Shropshire Climate Action Partnership endorses the content from the Better Shrewsbury Transport (BeST) on Shropshire Council: Regulation 19: Pre-Submission Draft of the Shropshire Local Plan Feb 2021.

This document presents a narrative response to the draft Local Plan from Better Shrewsbury Transport (BeST, www.bettershrewsburytransport.org/who-we-are/). BeST comprises a group of organisations and individuals that is keen to engage positively with Shropshire Council to promote active and sustainable solutions to the town's transport challenges. We are campaigning for urgent action to promote these modes of transport as they are the only effective ways to reduce congestion, poor air quality and road deaths/injuries whilst transforming all our lives for the better. In particular we are calling for the council to immediately halt work on the regressive and damaging Shrewsbury North West Relief Road (NWRR) which is being promoted in the Local Plan.

Whilst, as a group, we are primarily focused on issues of sustainable transport, as described in the recent [RTPI report](#) (Net Zero Transport: the role of spatial planning and place-based solutions, Jan 2021), spatial planning and the transport system need to be considered together in order to put the country onto a pathway to net zero greenhouse gas emissions (net zero). Given the declaration of a climate emergency at national and local levels, this must be a central component of this Local Plan which will cover the major part of the transition to net zero. RTPI, 2021 goes on to say:

The planning system should also prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand. This should focus on maximising the potential for local living by ensuring that

most people can access a wide range of services, facilities and public spaces by walking and cycling. Increased home working, digital service delivery, and new forms of flexible work and community spaces will play a key role, alongside investment in place.

The essence of our response is that the draft Local Plan fails to adequately engage with the urgent need to ensure that key planning decisions over the plan life cycle will contribute to the national and local pathway to net zero. With regard to the urgency with which this must be treated we note the following from the recent Environmental Audit Committee [report](#) on Greening the Post COVID Recovery:

The covid-19 crisis must be treated as a wake-up call. It is a symptom of a growing ecological emergency. .. The way in which the UK and other nations respond to the global economic downturn, and the stimulus that national governments direct to recovery efforts, will be pivotal in determining whether the goals of the Convention on Biological Diversity and the Paris Agreement on climate change will be met. Climate scientists advise that a very limited time window is left to slow the build-up of emissions in the atmosphere and thereby limit the increase in global heating to 1.5 degrees Celsius. If the economic recovery from covid-19 is not used as an opportunity to 'grow back better', then climate change and biodiversity collapse may deliver an even greater crisis. There will be no vaccine against runaway climate change

This is particularly the case with respect to the interaction of spatial planning and transport as Shropshire Council has failed to update its Local Transport Plan in time to inform the draft Local Plan. After consideration, we have decided to issue all our comments about this draft of the Local Plan against the 'Spatial Vision' in Para 2.31 of the draft plan as we feel that the admirable objectives described in the vision will not be delivered by the plan as currently set out. In our response to Q5 below we identify the key areas of the plan that need to be improved to achieve this.

Representation Form Part B Q4 – Response for Para 2.31 and associated SP1: The Shropshire Test

The ambition of the stated Spatial Vision (para 2.3.1) is admirable. However, we consider that the plan, as set out in the draft document, will fail to deliver on the key elements of this vision (as set out in SP1: The Shropshire Test):

- a) **Supports the health, well-being and safety of communities;** The plan has selected a higher target for house building than government targets on the misguided assumption that building houses equals growth and this in turn leads to health and happiness. When consulted, the people of Shropshire clearly showed a preference for lower rates of building (according to [CPRE, 2018](#) Shropshire, 88% of Members of the Public and 74% of Town and Parish Councils wanted moderate or lower levels of housing growth) and the plan contains no detail on how these building targets will translate into the objectives of sustainable development or meet the aspiration of the vision nor how building these houses can be part of a pathway to net zero greenhouse gas emissions for the county.
- b) **Supports cohesive communities;** A key requirement for community cohesion is an integrated transport network that does not exclude certain groups. Shropshire Council currently cannot demonstrate that it has taken this into account in the development of this draft Local Plan as the associated Local Transport Plan is completely out of date and a new plan will not be in place until at least Sept 2021. Meanwhile, there is no definition of the term 'right location'. How will this be assessed and measured? The 2018 report [Transport for new homes](#) revealed the deep flaws in the planning system which leave new housing developments with inadequate walking, cycling and public transport connections to surrounding areas. With limited facilities locally, residents are for the most part forced into car-dependency.

In this respect, absorbing housing demand from adjacent urban areas into a largely rural area seems to be completely counter to the need to control car dependent development and map a pathway to a net zero transport system.

The majority of new house building in the draft local plan is located in places that will be car-dependent, have no or poor access to walking, cycling and public transport opportunities and will add carbon emissions as a result of extra car trip generation as a result of site selection that embeds car dependency and lack of options for walking, cycling and bus use in that decision and the lack of joined-up thinking on how to facilitate and

provide the infrastructure to support walking, cycling and public transport when new residents move into the new homes.

There is no reference to car-free housing potential and there is no reference to site selection based on trip estimation data by different modes. Data on trip estimation for new housing is available on the [TRICS database](#). It is regrettable and contrary to net zero carbon targets that trip estimation for different locations and configurations of walking, cycling and bus use opportunities have not been factored into locational decisions for new homes.

The Local Plan, if it is to make a contribution to delivering carbon reduction and mapping a pathway to net zero carbon emissions, must define “the right location” and specify the conditions that must be met to reduce car use and increase the use of walking, cycling and buses. It is not acceptable to ignore the impact of car trip generation and its impact on increasing transport’s carbon emissions: the plan says that it refers to a climate change strategy but fails to adequately address the largest contributor to carbon emissions in the county (transport) mainly because the local transport plan is completely out of date and a new plan will not be in place until at least Sept 2021.

- c) **Addresses the causes and mitigates the impacts of climate change;** Whilst the need for the Local Plan to proactively map a pathway to a net zero society is not at present explicit in the NPPF, given the national and local declarations of a climate emergency, it is our view that this should be taken as a core part of the definition of sustainable development. The plan needs to recognise the centrality of spatial planning in the transition to a net zero transport system and describe how the planned developments will contribute to this.

A local plan written in 2020 and covering the period up to 2038 against the background of a declaration of a climate emergency, government commitment to achieve net zero carbon emissions by 2050 (with substantial reductions to be achieved by 2030) and against the background of the very serious consequences locally, nationally and globally of failing to deliver carbon reductions, must interrogate every statement and every policy to answer the questions (based on evidence) “by how much will this policy reduce carbon emissions by 2030/50” and “will this policy add to carbon emissions”

If a policy on any subject at all cannot be convincingly related (with evidence) to its outcome measured in terms of carbon reduction it must be amended. If a policy (based on evidence) leads to an increase in carbon, it should not have been there in the first place and must be discarded. In this respect, the following quotation from the Thames Gateway Bridge (2007) Inspector’s Report (Inspector: Michael Ellison MA Assistant Inspector: John Watson BSc FIHT MICE MCMI)

*Global warming and climate change. The estimated proportion of all greenhouse gas emissions in the UK that comes from transport varies according to the views of different estimators, but is generally thought to lie in a range between about 21% and about 32%. Private cars account for about 10% of UK carbon dioxide emissions. (9.379) Carbon dioxide reduction from transport is possible to the level required by national policy, but it would require behavioural change. TfL’s evidence is that the scheme would result in the emission of an additional 55,000 tonnes of carbon dioxide in 2016. (9.380) TfL respond that this is only an increase of 0.4% across the study area. Even if it were doubled, it would be less than 1%. (9.381) **It seems to me that even a small increase offers no assistance in achieving a reduction to which the Government has made a commitment. (9.382)***

On the other hand, I consider that the proposed TGB would not comply with national planning policy on transport, and it would result in a negative contribution to the Government’s commitment to reducing greenhouse gases. (9.427)

Note that the inspector recommended that the TGB should not go ahead.

Following this argument, it is inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability. If a development cannot be economically developed in a way that contributes to the pathway to net zero then it should not go ahead. In our response to Question 5 we have highlighted sections of the plan where such exemptions should be removed.

- d) **Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;**

In respect of blue networks, we agree with policy DP19 (water resources and water quality) and point out that the promotion of the Shrewsbury North West Relief Road (NWRR) by Shropshire Council within the Local Plan is inconsistent with Para 3 of this policy as the proposed road includes a major roundabout across the inner Source Protection Zone (SPZ1) of the Shelton Water Supply.

- e) **Raises design standards and enhances the area’s character and historic environment;** As discussed above, there should be no exemptions from requirements to comply with measures that contribute to the pathway to net zero greenhouse gas emissions.
- f) **Makes efficient use of land;** and
- g) **Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.**

The largest council promoted scheme detailed in the plan is the proposed North West Relief Road (DP28 3e and 4.257 and S16.1 7, 10a). A planning application for this scheme has been submitted by the council but the details are not yet available publicly. However, our calculations indicate that the scheme will lead to higher levels of car use and an increase in carbon emissions in the county during the plan period. It is therefore not appropriate for the Local Plan to include the promotion of this scheme.

Representation Form Part 5 Q5 – Response for Para 2.31 and associated SP1: The Shropshire Test

In the Tables below we have highlighted

Para/Policy	Changes required
SP3	<p>Whilst we welcome the inclusion of a specific Climate Change policy, we feel it needs to be much stronger. For example “Climate Emergency” would be a better policy title reflecting Shropshire Council’s declaration.</p> <p>Paras 1a-g in SP3 are at variance with established policies of Shropshire Council and its public statements that damage public transport and active travel e.g. its rejection of default 20mph zones at full council in December 2019 when evidence reveals the effectiveness of these lower speed limits in terms of increasing walking and cycling and reducing transport’s carbon emissions. Recent years have, in addition, seen reductions in bus funding and there are public statements from the council about demolishing Shrewsbury bus station and destroying a central principle of sustainability in transport which is “integration”. Shrewsbury bus station is close enough to the train station to encourage bus and train use in combination and this combination (with attractive ticket deals) is a stimulus to modal shift (transferring car trips to public transport) which in turn reduces carbon emissions from the transport sector. The track record of Shropshire Council of neglect and damage to walking, cycling and public transport (including its refusal to develop a Cycling and Walking Infrastructure Plan) is at variance with statements in SP3 and there is nothing in the Local Plan that demonstrates a reversal of these policies and a significant shift in the direction of supporting alternatives to the car.</p> <p>There is nothing in the Local Plan that gives substance to the aspiration of “maximising the ability to make trips by sustainable modes of transport”. It is possible to produce substantial increases in walking, cycling and bus use and the interventions that deliver these increases are well documented e.g. Cornwall County Council’s bus strategy making full use of the Bus Services Act (2017). Cornwall County Council makes sure that buses run seven days a week and that one ticket for all local bus and train services can be purchased. Shropshire Council has not used the provisions of this Act to improve bus services and there is nothing in the Local Plan to indicate that this will be done in the plan period.</p> <p>Our concerns remain that the text makes nothing compulsory. Great words, 'encourage' and 'where possible' and 'promoting' - meaningless unless enforceable and enforced.</p> <p>The aspirations here call into question traffic figures used in the outline business plan for the proposed Shrewsbury North West Relief Road which urgently need re visiting in the light of the COVID pandemic and the climate emergency.</p> <p>1.e. Weak wording, change “encourage” to “ensure”. A site should not be on the list unless it can be linked and integrated and unless it is a condition for development.</p> <p>1.f. The wording is weak as electric charging infrastructure should be provided in all new development.</p> <p>1.g. Fabric energy efficiency should be defined with a minimum figure.</p>

Para/Policy	Changes required
3.31	<p>The Strategy framework is not a strategy - merely an outline of how the strategy will be developed. The Local Plan needs to reference the council's Climate Change Strategy. However, that document only refers to Shropshire Council's emissions and it would be more appropriate to reference a document such as the Zero Carbon Shropshire Plan produced through the Shropshire Climate Action Partnership of which Shropshire Council is a contributor. This addresses the totality of direct and indirect emissions from the county and its residents and, in the absence of an up to date local transport plan, could provide some of the headline figures of how transport (and by implication spatial planning) needs to change.</p>
3.31 b.	<p>The implications of this policy have not been followed through into the traffic forecasts that are used in the outline business case for the NWRR.</p> <p>Support for active travel is not in any way linked to adoption of EVs or ULEVs. Driving a car is a sedentary activity and not in any way "active". Years of sustainable transport research have identified how car ownership produces much increased use of cars (rather unsurprisingly) and reduces walk, cycle and bus use. If people sit inside cars and do not walk or cycle they do not meet public health targets for physical activity and they incur an elevated risk of "non-communicable diseases" including diabetes, obesity and cardio-vascular disease. Getting people out of cars and into non-car alternatives reduces carbon emission and there is nothing in the local plan that will stimulate or promote non-car alternatives. There is a large literature on what is needed by way of infrastructure to support walk, cycle and bus use e.g. excellent segregated cycle paths, joined-up networks to link housing with schools and commonly used destinations and these requirements are not supported or funded in Shropshire. Shropshire Council has refused to adopt 20mph contrary to the advice of the World Health Organisation advice in the Stockholm Declaration (communicated to all national governments) that this increases active travel and modal shift away from cars and towards walking, cycling and bus use.</p> <p>Note the recent Stockholm Declaration</p> <p>https://www.roadsafetysweden.com/about-the-conference/stockholm-declaration/</p> <p>https://www.roadsafetysweden.com/contentassets/b37f0951c837443eb9661668d5be439e/stockholm-declaration-english.pdf</p> <p><i>Focus on speed management, including the strengthening of law enforcement to prevent speeding and mandate a maximum road travel speed of 30 km/h in areas where vulnerable road users and vehicles mix in a frequent and planned manner, except where strong evidence exists that higher speeds are safe, noting that efforts to reduce speed in general will have a beneficial impact on air quality and climate change as well as being vital to reduce road traffic deaths and injuries;</i></p> <p>Wholesale adoption of Electric vehicles on its own is not enough to meet net zero targets and it is a major weakness of the climate change sections of the Local Plan that this fundamental point about transport and climate change is missed e.g. this recent report from Lyn Sloman at Transport for Quality of Life</p> <p><i>"Transport is now the UK's largest source of greenhouse gases. This is the first in a series of papers on what changes are needed in the transport sector if the UK is to deliver its fair share of global carbon reduction. It explains why a switch to electric cars is not enough, and why traffic reduction is also needed. The level of traffic reduction needed by 2030 could be between 20% and 60%, depending on the speed of the switch to electric vehicles."</i></p> <p>A completely new section should be included in the Local Plan explaining why we must reduce traffic levels (e.g. a 25% reduction in vehicle kms travelled in Shropshire). This is well understood and can be found in UK government reports but is not mentioned in the Local Plan. This government report is from 2005</p> <p>https://webarchive.nationalarchives.gov.uk/20100304004945/http://www.dft.gov.uk/pgr/sustainable/smarterchoices/ctwwt/</p>
SP5	<p>This could be strengthened by the additional guidance: "should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage". High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.</p>
SP6 para 6 and 7	<p>We welcome the inclusion of Sport's England's '10 principles of active design' as a requirement for developments. However, it is not possible for individual developments to contribute properly to well designed walking and cycling routes without there being a high level strategy of where these routes need to be. In this respect, Shropshire Council's refusal to develop a Local Walking and Cycling</p>

Para/Policy	Changes required
	Infrastructure Plan (as strongly recommended by central government) will largely negate the potential benefits of this policy.
DPs	All DPs should contain an explicit link to the ways they will assist in achieving net zero carbon. They do not. It is astonishing and unacceptable that DP10 (Tourism and Leisure) fails to recognise the importance of shifting tourism car trips as much as possible to public transport and bikes. This is unacceptable and DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
Policies DP3 - 7	<p>There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.</p> <p>Playing pitch strategy 2010-2020 states;</p> <p>Building new facilities on new sites is generally a 'last resort' approach when all other options have been explored given the capital investment implications. It is only appropriate where there is a lack of provision overall and deficiencies across a number of sports which cannot be fully addressed by implementing the policy options outlined above.</p> <p>In other words not only is there a lack of infrastructure for cycling and pedestrians but also a lack of infrastructure in the design of new facilities including public open spaces that families can actually access.</p>
Policy SP12	We see no obvious reference to addressing business carbon emissions in SP12 - there should be!
SP10	Renewable energy is mentioned in the opening paras but there is no consideration in the plan of how much is required or how this might be achieved. How many solar or wind farms are likely to be required and where would they be best located within the county?
Policy SP10 (5d)	Investment should be prioritised for sustainable transport in appropriate locations, as road transport is a major contributor to the Climate Emergency. This is in line with DfT guidance on a hierarchy of road users.
Para 3.144 and 3.145	Replace "should" with "must" to make this enforceable.
Para 3.161	We welcome reference to the government's 25 Year Environment Plan but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.
Policy DP10	Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer.
Policy DP10 (f)	The natural environment has been recognised as the major draw for tourists to the county. Retaining and enhancing natural features is therefore key to the long term success of the tourism industry. Stronger wording is recommended.
DP11	<p>This only talks about minimising emissions – not road to net zero. It does not form the basis of a coherent plan for supporting the county's contribution towards the national target of net zero by 2050.</p> <p>It is astonishing that the information in the Local Plan that transport carbon is responsible for 37% of Shropshire's total carbon, transport is not used to support policies that explicitly and tangibly reduce car use. Transport carbon reduction is not mentioned in 1a-1d or sections 2, 3 and 4</p> <p>Bearing in mind what has happened regularly with affordable housing, this leaves far too much scope for backtracking.</p>
Policy DP11 (1c)	We welcome this but we would like to see a commitment to an increased level of on-site renewable energy sources.
Policy DP11 (2)	We believe large commercial/industrial developments must have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources. See comment on 3.134.
Policy DP11 (4)	Disappointing that when reducing carbon emissions and addressing climate change is balanced against profit, profit wins! We have a climate emergency on our hands and this must be the priority for what happens in the county over the period of this plan.
DP12	The ambition of 10% gain for nature is not ambitious enough; both the Wildlife Trusts and the UN have identified a need for 30% of land to be protected and in recovery for nature. Government proposals are for at least 10% gain, why are we only looking at the minimum figure? Given the role of the natural

Para/Policy	Changes required
	<p>environment in Shropshire's attractiveness as a place to live, do business and visit, protecting the natural environment needs to be at the core of the Local Plan.</p> <p>The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.</p>
Policy DP12 (4)	Add areas within any future Nature Recovery Network to the list to be assessed.
Policy DP12 (5)	Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed should be refused. Exceptions should only be made in the most exceptional circumstances and there would need to be a clear methodology for how you compare the value of a natural asset to economic or social benefit.
Policy DP14 (4)	Green space should be managed and maintained for at least the lifetime of any development.
Para 4.144	We would question the infeasibility of producing a green infrastructure opportunity map. If this is purely due to a lack of resources, partnership with other organisations should be explored to develop a map. In the NPPF paragraph 174, it is suggested that maps are needed for restoration/creation areas.
DP15	We feel that both quality and quantity are important and perhaps need to be considered more equally.
DP28.	There is no content at all in the Local Plan around "widen travel and transport choices". This is an astonishing omission and vague aspirational statements not backed by tangibility of any kind are worthless. Does the demolition without replacement of Shrewsbury bus station as announced by the leader of the Council contribute to widening transport choices?
4.248	Note that the strategic developments are not located on existing rail infrastructure and so this implies additional road building which is not consistent with the need to address the Climate Emergency
4.249	The hierarchy is a prioritisation tool setting out important principles that will inform overall public policy including the policies of Shropshire Council. The hierarchy is very clear about the most important things (the top 3 lines) and the least important thing, the private car. Shropshire Council has demonstrably reversed this hierarchy in every way possible by proposing to spend up to £37 million on the NWRR and trivial amounts of walking, cycling and buses. It has cut bus funds and now wishes to close the bus station. It is astonishing that the Council quotes the hierarchy when important decisions (20mph and bus station) have ignored the hierarchy.

Q5 Policies that specifically reference the proposed Shrewsbury North West Relief Road (NWRR) and therefore need revision once the promotion of the NWRR is removed from the plan as being inconsistent with the need to map a pathway to net zero greenhouse gas emissions

Para	Implications/response needed
4.257	<p>As discussed above, the business case for the NWRR is built around forecasts of increasing traffic whereas the Climate Emergency and Net Zero CO₂ target require national and local government to adopt policies that will see traffic levels drop steadily over coming years. The business case for the NWRR therefore needs to be completely re assessed in the light of this falling demand. We do not see how the cost of the road can be justified against a poorly stated and quantified case that it will enhance the subregional role of Shrewsbury.</p> <p>Adoption of the NWRR in the plan is contrary to the national objectives of net zero carbon by 2050 i.e. to prioritise “development opportunities” above reducing carbon emissions.</p> <p>It is not acceptable that this reference to the largest capital expenditure on transport ever undertaken by Shropshire Council is not explicitly linked to its impacts on carbon emissions. The NWRR has not yet got planning permission and may be subject to a public inquiry. A Local Plan written in the months following the declaration of a climate emergency must not remain silent on the carbon impacts of NWRR. If it is the view of independent experts that the NWRR will reduce carbon then this must be stated in the Local Plan, with evidence, so we can evaluate the robustness and fitness for purpose of the Local Plan. If it is the view of independent experts that the NWRR will substantially increase carbon emission in 2 ways (1) embodied carbon from the whole life cycle of raw materials, earth disturbance, construction etc and (2) in use carbon associated with the very well documented evidence that “new roads generate new traffic” then this must be stated and fed into a realistic assessment of whether or not Shropshire Council can contribute to the achievement in net zero carbon by any deadline.</p> <p>New roads like the NWRR generate new traffic (additional to current totals) and this increases transport’s carbon emissions. This is well understood and summarised in a UK government report published in 1994: https://bettertransport.org.uk/sites/default/files/trunk-roads-traffic-report.pdf</p> <p>Shropshire Council has confirmed in response to a direct enquiry that, in the absence of an updated Local Transport Plan, the existing plan - LPT3 (which is available on the council’s website) remains the relevant transport plan. This states that it does not envisage that the NWRR will be needed during the lifetime of that plan. The only reason that the NWRR features in the local plan now is because funding has become available – not because it is needed or an essential part of the Local Plan.</p>
S16.1 7)	<p>See comments above about the weak case for the NWRR. This should be omitted from the Local Plan unless a revised business case and carbon assessment shows that it still makes economic and environmental sense.</p> <p>The Shrewsbury Place Plan appears to allow commercial development but not residential in the area west of Ellesmere Rd but this is not clear in the document.</p>
S16.1 10a	<p>The reinforcement and enhancement of the local and strategic highway network: Investment in new roads is not consistent with the Climate Emergency or Net Zero CO₂ target.</p> <p>Shrewsbury Integrated Transport Strategy, the Big Town Plan Movement Strategy and the Shropshire Local Transport Plan: None of these documents are available for the consultation and it is not clear how they support or are supported by the NWRR.</p>
Land west of Ellesmere Road, Shrewsbury (SHR173) p274	<p>This seems to get the green light assuming NW road built – but traffic won’t be included in NWR assessment. This needs to be included as understanding cumulative impacts of developments is essential.</p> <p>Although the presence of an adjacent Local Wildlife Site and nearby SSSI are mentioned in various sections of Sustainability Appraisal text they are not counted in the assessment matrix. Also rather strangely the site scores well in terms of the climate change assessment (bus stop within 480 m) despite the issue of the number of car journeys being generated being of such a scale that the development would be dependent on the proposed NWRR to accommodate the additional traffic.</p>
5.225	<p>See comments above about the need for the traffic implications of SHR173 to be included in the NWRR traffic modelling to assess cumulative impacts.</p>
DP19	<p>We agree with this policy and point out that the promotion of the NWRR in SPZ1 of the Shelton Water Supply within the Local Plan is inconsistent with this.</p>

Para	Implications/response needed
DP22	The construction of the NWRR on an embankment on the floodplain of the River Severn will increase flood risk upstream. This has now changed to construction on columns to reduce this risk (but increase noise and visual intrusion). This aspect was not featured adequately in the public consultation and this will need to be repeated with consequent implications for timing of the scheme.
App 3 DP28 5. Shrewsbury North West Relief Road – Outline Business Case (2017)	As discussed above, the Business Case for the NWRR needs to be substantially re worked compared to the Outline Business Case to take into account falling rather than growing levels of traffic.

Representation Form

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership (SCAP)

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: No:
- B. Sound Yes: No: 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.

Paragraph 2.31 set outs:

The Vision for Shropshire in 2038 reflects the wide role of the Local Plan to promote all aspects of sustainable development, and takes its lead from a range of other strategies it seeks to deliver.

"In 2038, 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; economic productivity will be maximised through greater investment; and the County's historic and natural environmental assets will be protected and enhanced".

The text of SP1 does not incorporate these objectives nor does it reference the Shropshire Council Climate plans recently adopted by the council. It is thus not sound and is incomplete.

Furthermore, this spatial vision is not consistent with the objectives of SC that Shropshire achieves net zero carbon by 2030. The vision statement needs to be updated to reflect this.

(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.

Office Use Only
Part A Reference:

Part B Reference:

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. At SP1 para. 1 add:

h. Regards the Spatial Vision for Shropshire set out in 2.31 above as a mandatory test for any decision including any planning decision made by Shropshire Council.

Proposed amended Vision in 2.31:

"In 2038, communities will be safe and healthy as Shropshire moves positively **forward as** a zero carbon economy; all residents will be able to access well-designed, decent and affordable homes in the right location; economic productivity will be maximised through greater investment; and the County's historic and natural environmental assets will be protected and enhanced

(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:

To emphasis the requirement of these changes to the plan

(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:

A. P. Wilson

Date:

24/02/2021

Office Use Only
Part A Reference:

Part B Reference:

Office Use Only
Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership (SCAP)

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: No:
- B. Sound Yes: No: 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.

SP1 para 2 states:

In addition, and where appropriate proposals should seek to reflect relevant considerations of Shropshire Council's other strategies, including its Community Led Plans, Local Economic Growth Strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, and the Public Health Strategy.

The schedule of other relevant strategies should include the 'Climate Change Framework' dated 19 December 2019 <https://shropshire.gov.uk/committee-services/documents/s23757/Climate%20Change%20Strategy%20Framework%20Final%20sent%202.pdf>

That document states Shropshire Council declared a climate emergency in May 2019 and agreed a Strategy Framework in December 2019 which established the objective of net-zero corporate carbon performance by 2030 and supporting achievement of a suitable objective for net zero carbon Shropshire, along with Shropshire Council subsequent membership and support for Shropshire Climate Action Partnership and the Zero Carbon Shropshire Plan with its objective of achieving net zero carbon Shropshire by 2030.

The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with Shropshire achieving net zero carbon by 2030 and the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal.

(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.

Office Use Only
Part A Reference:

Part B Reference:

Revise SP1 para2 to read:

In addition, and where appropriate proposals should seek to reflect relevant considerations of Shropshire Council's objectives for net zero carbon Shropshire by 2030, and other strategies, including its Community Led Plans, Local Economic Growth Strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, the Public Health Strategy and the need for all new planned development to be of zero carbon standard from 2030 in line with declared objectives responding to the Declared Climate Emergency.

(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:

It is essential that the examination fully appreciates the implications of the Declared Climate Emergency on the subsequent interpretation and implementation of the wider Shropshire Local Plan

(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:

A.P. Wilson

Date: 24/2/2021

Office Use Only
Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership

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: No:
- B. Sound Yes: No:
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.

SP2 set outs:

Over the plan period from 2016 to 2038, around 30,800 new dwellings and around 300 hectares of employment land will be delivered. This equates to around 1,400 dwellings and around 14ha of employment land per annum.

It is not clear what the definition of "employment land" is. The amount stated here is wholly insufficient to allow Shropshire to realise its renewable energy commitment if land use for photovoltaic arrays and any other forms of renewable electricity generation are included within the scope of employment land.

(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.

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Office Use Only
Part A Reference:

Part B Reference:

At SP2 Para 2. add:

"For the avoidance of doubt, 'employment land' excludes areas used for the development and operation of systems producing renewable energy.

OR

at a suitable and binding place in the strategy, provide a proper definition of 'employment land' and other land use types referenced in the Strategy that incorporates this definition

OR

provide a reference to an external accepted standard that clearly incorporates this definition.

(Please continue on a separate sheet if necessary)

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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:

<i>(Please continue on a separate sheet if necessary)</i>	
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:

A. P. Wilson

Date: 24/02/2021

Office Use Only
Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

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="3.28(d)"/>	Policy:	<input type="text" value="SP2"/>	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>We question the ability for this (A41) strategic corridor to deliver true sustainable economic growth. There is no bus service along the A41. Public transport to and from Market Drayton and Whitchurch involves travelling via Shrewsbury along the A53 which is not considered a strategic corridor.</p>
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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.

The term strategic corridor should be defined as one along which some form of public transport – bus or rail - is provided. Current meaning seems to imply 'an A class road'

(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)?

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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)

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Signature: A. P. Wilson

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

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="2"/>	Policy:	<input type="text" value="SP2"/>	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 type="checkbox"/> | No: | <input checked="" 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.

The move to a low carbon economy,(NPPF Para 8) and to net zero by 2050 (Climate Change Act 2008 as updated) requires not only the elimination of emissions at source, but a careful limitation on the amount of carbon embodied in construction. Without adequate policies to regulate this issue through the planning system the relevant Government policies will not be complied with, and therefore the plan as it stands is unsound. See, for example <https://www.theccc.org.uk/publication/options-for-incorporating-embodied-and-sequestered-carbon-into-the-building-standards-framework-aeom/> This may lead to some projects being abandoned because it cannot be demonstrated that the embodied carbon would be repaid by the carbon reduction of an installation. Examples are for instance, the carbon embodied in a wind turbine is characteristically repaid by the renewable energy generation within a few years; or on the other hand, the carbon embodied in a petrol filling station constructed in 2020, which is unlikely to be repaid by public utility due the Government policy leading to phasing out internal combustion engine use between now and 2040. The amounts can be highly significant. For instance the calculated embodied emissions from road schemes are calculated to be about 1kGCO₂e per £1 (2010) spent on construction. The emissions embodied in the

North West Relief Road are therefore of the order of 70,000 tonnes CO₂e. To comply with government policy this “expenditure” of carbon would have to be “repaid” within a reasonable time.

It is Zero Carbon Shropshire’s view that without this being reflected in planning policy, net zero carbon will not be achieved; and that although the policies of SAMDev would have permitted such an approach, there is no evidence that this was ever adopted by the planning authority. Therefore a more explicit policy is required. ZCS however recognises that the specification of such a policy requires a technical insight which is not available to them. The suggested policy is therefore made in a constructive spirit, whilst recognising that this may be a matter best referred back to the planning authority to engage expert advice.

While we accept the general Strategic Approach, we question the scale of development, both housing and employment land. The insistence on pursuing a level of housing in excess of housing need is not a sustainable approach and reflects the focus on economic growth. This is contrary to section 2 of the NPPF which states that the three overarching objectives of sustainable development (economic, social and environmental) need to be “pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”. This concern filters down to the various place plan areas and sites all of which are placed under additional pressure to deliver housing beyond the overall level of need.

The Planning and compulsory Purchase Act (section 19) and the NPPF (Paragraph 148 – 149, incorporating footnote 48) require Local Plans to carbon audited, and to “contribute to radical carbon emission reductions in line with the Climate Change Act” (which itself commits us to reducing emissions to net zero by 2050). Paragraphs 1 and 7 of the online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government provides further detailed interpretation of the NPPF requirements.

Future Homes Standard consultation has now been published, confirming the government’s to tighten up the building regulations as follows:

1. Interim standards requiring a 31% reduction in carbon emissions above building regulations from 2021.
2. Reducing carbon emissions from new homes by at least 75% from 2025
3. Banning the installation of gas central heating in new homes from 2025.

The interim standards (31% reduction) from 2021 will now act as the “regulatory floor” and we’d encourage the council to tighten the policy to require an overall 35% on-site carbon reduction, via fabric energy efficiency standards, on-site renewables, zero / low carbon heat, with remaining emissions being offset by contributions into a carbon offset fund, to pay for off-site carbon reduction or sequestration. The wording, “strongly encouraging” (d) could be tightened up considerably, along the lines of the London Plan: “major development should be zero carbon”.

(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.

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	Part B Reference:

In all development proposals (above a certain threshold – eg £2m, 10 dwellings, 1ha) an assessment of net lifetime emissions including embodied carbon will be required. Where this exceeds (eg 25gm/£1) with repayment times above (eg 10 years) development will only be permitted in very special circumstances

SP2 should be revised to reduce the level of new building. Development Plans should comply with NPPF (2019) para 68 “identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare”

(Please continue on a separate sheet if necessary)

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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)?

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- 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)

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Signature: A. P. Wilson

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

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="6"/>	Policy:	<input type="text" value="SP2"/>	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.

In proposing community cluster developments, no mention is made of the transport infrastructure or public transport requirements. Rural Community cluster developments result in a larger carbon footprints than those in urban centres – where new developments should be concentrated.

The committee on climate change have come to broadly similar conclusions:

“Local Plans / Transport Plans should deliver 33 – 35% modal shift from cars to walking, cycling and public transport for shorter trips, for cities this can be higher.

New developments to prioritise walking and cycling infrastructure at the masterplanning stage and well-linked to viable public transport routes.

Constraining the growth in vehicle mileage is vital to reducing emissions, even as EVs replace petrol and diesel cars - car and van mileage can be reduced by 7 - 16% by 2030 & 12 - 34% by 2050”

(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.

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Transport infrastructure, including access to public transport should be included in the criteria for selecting rural development sites in policy SP2

(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.

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

(Please tick one box)

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Signature:

A.P.Wilson

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

Q1. To which document does this representation relate?

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- 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" value="SP3 & SP19 6.3"/>	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>Whilst we welcome the inclusion of a specific Climate Change policy, we feel it needs to be more strongly worded.. For example "Climate Emergency" would be a better policy title reflecting Shropshire Council's declaration.</p>

(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.

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SP3 is an expression of intent. Hard targets or key performance indicators need to be added given the county' adoption of a Climate Emergency.

(Please continue on a separate sheet if necessary)

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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:

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Signature:

A. P. Wilson

Date:

25/02/2021

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Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership

Q1. To which document does this representation relate?

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- 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: No:
- B. Sound Yes: No: 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.

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There are a number of problems with the plan as currently drafted:

- 1 Planning and compulsory Purchase Act (section 19) and the NPPF (Paragraph 148 – 149, incorporating footnote 48) require Local Plans to be carbon audited, and to “contribute to radical carbon emission reductions in line with the Climate Change Act” (which itself commits us to reducing emissions to net zero by 2050). These steps have not been taken and the auditing requirements have not been incorporated in the policies.
- 2 Paragraphs 1 and 7 of the online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government provides further detailed interpretation of the NPPF requirements. In essence, Local Plans are required to demonstrate how their policies are in line with the legally binding carbon emission reduction targets in the Climate Change Act. In summary, local plans are to:

- Take into account baseline emissions
- Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios
- Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050.

In addition, the local plan should demonstrate how net zero carbon Shropshire will be achieved by 2030, in line with Government policy and Council objectives, and require new developments and activities to be aligned to this objective. The local plan must also ensure that the evidence base provides an overall carbon budget for the district to 2050, consistent with the updated Climate Change Act. It should show baseline emissions and the impact of development and mitigating policies on this emission curve. The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal. To the extent possible, all new development should be zero carbon given that the country’s net zero target must be met in the next 30 years.

The plan as drafted is not sound. References to reducing carbon emissions are general rather than objectively measurable as required. It is not legally sound in terms of its climate change mitigation policies and duties.

The process of carbon auditing as set out in the NPPF and Planning Practice Guidance is essential as they will demonstrate that it will be very difficult to achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. Thus, following the process set out in legislation, planning policy and guidance to the letter will support the need for very ambitious planning policies around building performance. Such an approach is essential and will provide essential evidence to support proactive and supportive renewable energy policies that are essential to carbon emission reductions that are the stated goal of Shropshire Council.

The relevant policies must be amended to help the council align its local plan with its climate emergency declaration, and provide evidence to support the development and adoption of stronger planning policies that are likely to be needed to achieve the net zero carbon Shropshire 2030 goal and ensure that policies are in line with Government policy.

Furthermore, SP3 2.d set outs:

Supporting the development of community energy generation and distribution schemes, where they meet the policy requirements of the Local Plan and any relevant national policy.

This limits the possible energy generation as a response to climate change to a scale of local generation and distribution. This is not sound in light of the national need for renewable generation.

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It is noted that policy SP12 is referenced in this document several times and may well be intended to cover this point, but (like all the policies listed at Appendix 3) these are only described as '... key evidence informing these policies...' not as being binding on how these policies are applied.

The plan also as a list of negative impacts which renewable energy developments could give rise to, rather than a positive strategy which maximises the potential for development as required by the NPPF (para 151).

Policy text should also be included giving specific encouragement to community energy projects and defining what is meant by "community energy". Once again, the NPPF (para 152) advises that Local planning authorities should support community-led initiatives for renewable and low carbon energy.

(Please continue on a separate sheet if necessary)

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In order to make the plan sound it is necessary to incorporate the following amendments:

Clause 1(g) this clause needs to be integrated within policy DP23 which sets out the council's approach to conserving and enhancing the historic environment. Policy DP23 makes no mention of energy efficiency retrofitting, and this is the council's main policy covering conservation and listed buildings so suitable amendments are vital to these policies if they are to achieve the intended objectives.

Clause 2 supports community energy proposals, but no-where is this taken up or elaborated upon in policy DP26. Suitable amendments are required to achieve this.

Clause 3 about maximising carbon sequestration needs to be better integrated with policies DP14 (Green infrastructure) and DP16. Landscaping of New Development which make no further mention of sequestration.

Delete Clause 4 and replace with the following:

Development will be expected to include site and building-level measures to be resilient to future climate change impacts and provide for the comfort, health, and wellbeing of current and future occupiers and the surrounding environment over the lifetime of the development. These measures should be integral to the layout and design of new development and should take the vulnerability of the building occupants into account.

Site-level adaptations

Development should be designed, through its layout, form and massing and through the use of green/blue infrastructure, to:

- 1 Minimise the overheating of buildings;
- 2 Provide comfortable external spaces in hot weather; and
- 3 Conserve water supplies and minimise the risk and impact of flooding.

The use of green/blue infrastructure should provide multifunctional benefits in relation to climate change adaptation. Where appropriate to its context, this should include the use of living roofs with a sufficient substrate depth to maximise cooling benefits.

Building-level adaptations

Building designs and building-integrated measures should:

- 1 Mitigate the risk of overheating, ensuring that cooling needs are met sustainably;
- 2 Conserve water supplies; and
- 3 Avoid responses to climate impacts which lead to increases in energy use and carbon dioxide emissions.

Adaptation strategy

Proposals for development should demonstrate through an adaptation strategy how these issues will be addressed. This should include technical modelling and assessment of the risk of overheating in current and future climate change scenarios.

In considering the likely impact of climate change over the lifetime of the development (particularly in relation to overheating), reference should be made to the most recent climate change projections.

At Clause 2. Please also add:

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Part B Reference:

e) supporting the development of renewable energy generation schemes at a level compatible with viable business opportunities, to promote economic growth.

(Please continue on a separate sheet if necessary)

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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:

It is essential that the examination fully appreciates the implications of the Declared Climate Emergency on the subsequent interpretation and implementation of the wider Shropshire Local Plan

(Please continue on a separate sheet if necessary)

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Signature:

A. P. Wilson

Date: 24/02/2021

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Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
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Q1. To which document does this representation relate?

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- 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="1f"/>	Policy:	<input type="text" value="SP3"/>	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.

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Electric charging infrastructure should be mandatory in all new development. "Wherever possible" is an easy to apply get-out.

The committee on climate change have come to broadly similar conclusions:
"Local Plans / Transport Plans should deliver 33 – 35% modal shift from cars to walking, cycling and public transport for shorter trips, for cities this can be higher.
New developments to prioritise walking and cycling infrastructure at the masterplanning stage and well-linked to viable public transport routes.
Constraining the growth in vehicle mileage is vital to reducing emissions, even as EVs replace petrol and diesel cars - car and van mileage can be reduced by 7 - 16% by 2030 & 12 - 34% by 2050"

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Remove the statement "Where ever possible" as this is an excuse not to install the equipment
New paragraph 'f' should read as;

"Enable the installation / integration of electric vehicle charging infrastructure into new development, in line with the requirements of DP11; and"

(Please continue on a separate sheet if necessary)

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A. P. Wilson

Date:

25/02/2021

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Part A Reference:

Part B Reference:

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
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Q1. To which document does this representation relate?

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- 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:	3.17 &	Policy:	SP4	Site:		Policies Map:	
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
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| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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<p>The purpose of the local plan is to achieve sustainable development not to achieve the aspirations of the Economic Growth Strategy.</p> <p>This strategic policy is not a robust interpretation of the Brundtland report definition of 'sustainable development' and that which now advanced by the HMT Dasgupta Review 2021 on the Economics of Biodiversity</p>
--

(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.

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The term sustainable development is used more than 20 times in the Plan, but is not defined. The definition adopted by the World Commission on Environment and Development's 1987 Brundtland report 'Our Common Future' should be adopted: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs". This definition recognises current levels of development should be kept to a minimum in order to preserve biodiversity for the future.

(Please continue on a separate sheet if necessary)

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(Please tick one box)

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

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Signature:

A. P. Wilson

Date:

25/02/2021

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Part A Reference:

Part B Reference:

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Name and Organisation: Shropshire Climate Action Partnership

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- 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: No:
- B. Sound Yes: No: 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.

Explanatory note 3.40 under SP5 needs to comply with DP11 states:

d. Strongly encouraging all proposals for one or more dwellings and in particular residential development of 50 or more dwellings to:

- i. Achieve zero net-carbon emissions;*
- ii. Maximise the use of on-site district heating and cooling systems, especially where these utilise renewable energy and*
- iii. Maximise opportunities to connect to wider heating and cooling networks both for energy supply and export, especially where these utilise renewable energy*

If the Plan is intended to “reduce the impact of climate change” and buildings “Being designed to maximise fabric energy efficiency” (para `a`) then there is an inconsistency in the Plans proposal to ensure a 19% improvement (para `b`) while strongly encouraging net zero carbon emissions (para `d`)

In the circumstances of the climate emergency declared by Shropshire Council these are clear justifications for the Local Plan to ensure the zero carbon standard is met and ensures the maximised use of energy networks.

(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.

Office Use Only
Part A Reference:

Part B Reference:

Revise DP 11 para 'd' to read

d. Ensuring all proposals for one or more dwellings and in particular residential development of 50 or more dwellings to:

- i. Achieve zero net-carbon emissions;
- ii. Maximise the use of on-site district heating and cooling systems, especially where these utilise renewable energy and
- iii. Maximise opportunities to connect to wider heating and cooling networks both for energy supply and export, especially where these utilise renewable energy

This future supported by;

Future Homes Standard consultation has now been published, confirming the government's to tighten up the building regulations as follows:

1. Interim standards requiring a 31% reduction in carbon emissions above building regulations from 2021.
2. Reducing carbon emissions from new homes by at least 75% from 2025
3. Banning the installation of gas central heating in new homes from 2025.

The interim standards (31% reduction) from 2021 will now act as the "regulatory floor" and we'd encourage the council to tighten the policy to require an overall 35% on-site carbon reduction, via fabric energy efficiency standards, on-site renewables, zero / low carbon heat, with remaining emissions being offset by contributions into a carbon offset fund, to pay for off-site carbon reduction or sequestration. The wording, "strongly encouraging" (d) could be tightened up considerably, along the lines of the London Plan: "major development should be zero carbon".

(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:

It is essential that the examination fully appreciates the implications of the Declared Climate Emergency on the subsequent interpretation and implementation of the wider Shropshire Local Plan

Office Use Only
Part A Reference:

Part B Reference:

(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:

A. P. Wilson

Date: 24/02/2021

Office Use Only
Part A Reference:

Part B Reference:

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: Shropshire Climate Action Partnership (SCAP)

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: No:
- B. Sound Yes: No:
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.

DP11 states:

1. *New residential development will contribute to reducing the impact of climate change in accordance with Policy SP3 by:*

4. *The requirements expressed in this policy will apply unless it is demonstrated through open book accounting that they would make the development unviable, having regard to the policy requirements of the Local Plan, in particular the delivery of affordable housing."*

New build and refurbishment Building Regulation standards further informed by Future Homes Standards are evolving towards net zero carbon performance. To continue to build and refurbish building stock that fails to meet standards anticipated within 5 years represents a lost opportunity. The application Shropshire Local Plan can avoid that short-termism. The route to non-compliance by being "unviable" is too poorly defined to prevent low quality development in an otherwise very well defined sound policy. All the well stated aspirations laid out within the policy are too easily ignored by the unscrupulous use of "value engineering" and "viability tests" that have undermined many similar aspirational policies in the past.

(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.

Office Use Only
Part A Reference:

Part B Reference:

Revise DP 11 para 4 to read:

4. The requirements expressed in this policy will apply unless it is demonstrated through open book accounting that they would make the development unviable, having regard to the policy requirements of the Local Plan, in particular the delivery of affordable housing.

This demonstration shall at the minimum include a clear calculation of predicted carbon emissions, the cost of mitigation of those emissions through good design or through offsetting by on site renewable generation.

Where the viability test is accepted then all sales literature or public promotion of the development should include the facts as to why the development fails to meet expected carbon standards.

(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:

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(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:

A. P. Wilson

Date: 24/02/2021

Office Use Only
Part A Reference:

Part B Reference:

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: Shropshire Climate Action Partnership

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: No:
- B. Sound Yes: No: 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.

SP5 para 5 states:

"Permission will be refused for development of poor design and that fails to take the opportunities available for improving the character and quality of an area, the way it functions where it would adversely affect the well-being of others and where inadequate information has been submitted to demonstrate how new development will ensure the quality of design."

And Explanation note; 3.40 states

All planning applications for new development should set out how they comply with Policy SP5, the principles of the West Midlands Design Charter and comply how they comply with the design requirements of the other policies contained in this Local Plan.

There is no explicit reference to climate change which is considered an omission if the Local Plan is to reflect the broader demand of quality design. Other elements of the Local Plan such as DP11 make it clear that minimising carbon emissions is considered fundamental.

(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.

Office Use Only
Part A Reference:

Part B Reference:

Revise SP5 para5 to read:

Permission will be refused for development of poor design and that fails to take the opportunities available for improving the character and quality of an area, the way it functions where it would adversely affect the well-being of others and its adverse impact on the climate and where inadequate information has been submitted to demonstrate how new development will ensure the quality of design.

Revise Explanation note 3.40 to read:

All planning applications for new development should set out how they comply with Policy SP5, the principles of the West Midlands Design Charter and comply how they comply with the design requirements of the other policies contained in this Local Plan and shall include a clear Carbon Statement which details predicted carbon emissions and the methods and costs of achieving a net zero carbon development.

(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:

It is essential that the examination fully appreciates the implications of the Declared Climate Emergency on the subsequent interpretation and implementation of the wider Shropshire Local Plan

(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.

Office Use Only
Part A Reference:

Part B Reference:

Signature:

A. P. Wilson

Date:

24/02/2021

Office Use Only
Part A Reference:

Part B Reference:

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: Policy: Site: Policies Map:

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:
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.

SP10 3 set outs:

Sustainable employment, tourism, leisure, other business and community development proposals in the countryside will be positively considered, where they maintain or enhance countryside vitality and character, including through the use of previously developed land, and are consistent with national Green Belt policy and the wider policies of this Local Plan

The phrase 'maintain or enhance countryside vitality and character' is too tightly drawn to allow for new forms of employment to emerge – it condemns the rural area to a fixed and probably obsolete pattern of employment generation and land use.

(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.

Office Use Only
Part A Reference:

Part B Reference:

Revise SP10 3. to read:

Sustainable employment, tourism, leisure, other business and community development proposals in the countryside will be positively considered, including through the use of previously developed land, and are consistent with national Green Belt policy and the wider policies of this Local Plan

(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:

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(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:

A. P. Wilson

Date: 25/02/2021

Office Use Only
Part A Reference:

Part B Reference:

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:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

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="6 d"/>	Policy:	<input type="text" value="SP10"/>	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>There is no real policy on large intensive livestock units, which have huge environmental problems. Agricultural development is mentioned in policy SP10 but the policy content is not adequate to address the significant factors around this big issue for Shropshire. See https://www.cpreshropshire.org.uk/poultry-farms.</p>
--

(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.

Policy needs to look at the planning considerations in respect of warehousing type buildings being erected and totally out of keeping in rural settings.

(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:

It is essential that the examination fully appreciates the implications of the Declared Climate Emergency on the subsequent interpretation and implementation of the wider Shropshire Local Plan

(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:

A. P. Wilson

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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: Shropshire Climate Action Partnership

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: No:
- B. Sound Yes: No:
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.

SP12 para 4 f & 5b inconsistency with SP10 3 outline needs an amendment

SP12 f) set outs a range of 'rural economic enterprises'. These are too limiting. The phrase 'rural diversification' implies an existing enterprise undergoing some change, not the creation of new and innovative types of enterprise.

It is not consistent with the broader investment objective stated at 5b).

5b) is drawn to suggest that local low carbon energy investment should be wholly local.

This fails to recognise the direction in which the energy generation and distribution industry is moving nationally; towards a peer-to-peer smart and flexible electricity generation and distribution system.

(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.

Office Use Only
Part A Reference:

Part B Reference:

Revise SP10 3. as follows:

At 4 f) add:

iii) Innovative enterprises that seek to support Shropshire Council's climate change objectives

Sustainable employment, tourism, leisure, other business and community development proposals in the countryside will be positively considered, where they maintain or enhance countryside vitality and character, including through the use of previously developed land, and are consistent with national Green Belt policy and the wider policies of this Local Plan

Revise 5b) to read:

Renewable and low carbon energy generation including decentralised energy sources and to promote the productive use of this energy by businesses to reduce energy costs and increase energy 'independence' in the local and regional economy;

(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:

<i>(Please continue on a separate sheet if necessary)</i>	
<p>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.</p>	

Signature:

A. P. Wilson

Date:

25/02/2021

Office Use Only
Part A Reference:

Part B Reference:

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: Shropshire Climate Action Partnership

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: No:
- B. Sound Yes: No:
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.

SP12 para 5 states:

"The delivery of employment will be supported by investment in:

a. Housing of the right type, quality, tenure and affordability that will support the move towards increased home/agile working, in the right locations with jobs, services, facilities and leisure to make Shropshire a good place to live, work and play; Regulation 19: Pre-Submission Draft of the Shropshire Local Plan Page 54

b. Renewable and low carbon energy generation including decentralised energy sources and to promote the productive use of this energy by businesses to reduce energy costs and increase energy 'independence' in the local economy; etc.

There is no reference to the need to support employment through promoting training in low carbon and retrofit skills, the lack of such skills will be a limit to growth in a sector with huge potential over coming years

(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.

Office Use Only
Part A Reference:

Part B Reference:

Revise SP12 para 5 to read:

"The delivery of employment will be supported by investment in:

a. Housing of the right type, quality, tenure and affordability that will support the move towards increased home/agile working, in the right locations with jobs, services, facilities and leisure to make Shropshire a good place to live, work and play; Regulation 19: Pre-Submission Draft of the Shropshire Local Plan Page 54

b. Renewable and low carbon energy generation including decentralised energy sources and to promote the productive use of this energy by businesses to reduce energy costs and increase energy 'independence' in the local economy; etc.

with an additional paragraph to read;

g. Support and encourage local businesses and colleges to develop and sponsor skills training associated with new low carbon building technologies and with low carbon retrofit skills certification.

(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.*

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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:

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(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:

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Date:

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Office Use Only
Part A Reference:

Part B Reference:

Office Use Only
Part A Reference:

Part B Reference:

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)**.

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

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="5 e"/>	Policy:	<input type="text" value="SP12"/>	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 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 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.

5e "the adoption of new and more sustainable transport options to improve accessibility in Shropshire, remove capacity constraints to future business investments".

The committee on climate change have come to broadly similar conclusions:
"Local Plans / Transport Plans should deliver 33 – 35% modal shift from cars to walking, cycling and public transport for shorter trips, for cities this can be higher.
New developments to prioritise walking and cycling infrastructure at the masterplanning stage and well-linked to viable public transport routes.
Constraining the growth in vehicle mileage is vital to reducing emissions, even as EVs replace petrol and diesel cars - car and van mileage can be reduced by 7 - 16% by 2030 & 12 - 34% by 2050"

(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.

There is little in this Local Plan which supports this commitment. Investment should be prioritised for sustainable transport in appropriate locations, as road transport is a major contributor to the Climate Emergency.
Should read more positively;
“Transport and utilities infrastructure and the adoption of new and more sustainable transport solutions to improve accessibility in Shropshire, by the removal of capacity constraints to enable future business investments and to contribute towards climate management objectives; and”

(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)?

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- 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:

A. P.Wilson

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership

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: No:
- B. Sound Yes: No:
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.

See the discussion of 'employment land' given for SP2.

There is no scope in here for employment generation in response to climate change activity nor any Shropshire Council policy.

This policy is negligent / deficient in its representation of these issues.

(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.

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Office Use Only
Part A Reference:

Part B Reference:

Revise SP13 as follows:
Add Paragraph 8 as follows:

"To prefer employment development in green industries, particularly those involved in low carbon energy generation and to prioritise employment generation in these industries where there is a choice of other alternatives."

(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.

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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:

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(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: A. P. Wilson

Date: 25/02/2021

Office Use Only
Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership

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: No:
- B. Sound Yes: No:
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.

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SP15 does not encourage estate owners to consider opportunities in low carbon energy generation. This is of particular concern in that the largest proportion of Shropshire land area comes under such ownership.

(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.

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Office Use Only
Part A Reference:

Part B Reference:

Revise SP15 as follows:
Add Paragraph d) as follows:

"That they can demonstrate that that they have fully and properly considered opportunities for low carbon energy generation and can demonstrate good long term economic reasons why this is or is not possible."

(Please continue on a separate sheet if necessary)

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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)?

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- 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)	
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Signature: A. P. Wilson

Date: 25/02/2021

Office Use Only
Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation: Shropshire Climate Action Partnership

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: No:
- B. Sound Yes: No:
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.

S16 . 1 under Shrewsbury place area plan states:

"8. The extent of the Town Centre and Primary Shopping Area is defined on the Policies Map, and development in this area will be managed by Policy SP12. Consistent with the aspirations of the Big Town Plan, the defined Town Centre represents a particular opportunity for mixed-use development incorporating retail, leisure, residential and employment. Proposals which support the delivery of the objectives of the Big Town Plan, and which are in line with the other policies of the Local Plan, will be supported. This includes the creation of a corridor of opportunity running from the West End, to the Riverside, to the Northern Corridor to the Flaxmill Maltings. Such development will benefit from and contribute to the vibrancy and character of the area whilst also providing opportunities to diversify and extend the town centre offer."

This element defines the specific aspirations for Shrewsbury Town Centre and references the Big Town Plan but makes no reference is made in the Big Town Plan to the need for carbon free development so it must be added here to ensure the completeness of the Shropshire Plan document in reference to Shrewsbury Town Centre.

(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.

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Revise S16. 1 under Shrewsbury place area plan to read:

8. The extent of the Town Centre and Primary Shopping Area is defined on the Policies Map, and development in this area will be managed by Policy SP12. Consistent with the aspirations of the Big Town Plan, the defined Town Centre represents a particular opportunity for mixed-use development incorporating retail, leisure, residential and employment.

Further, to take advantage of the implementation of the Big Town Plan as a key intervention opportunity to begin the development of a zero carbon Town Centre through low carbon refurbishment and the introduction of a low carbon heat network.

Proposals which support the delivery of the objectives of the Big Town Plan, and which are in line with the other policies of the Local Plan, will be supported. This includes the creation of a corridor of opportunity running from the 'West End', to the Riverside, to the Northern Corridor to the Flaxmill Maltings. Such development will benefit from and contribute to the vibrancy and character of the area whilst also providing opportunities to diversify and extend the town centre offer.

(Please continue on a separate sheet if necessary)

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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)?

Office Use Only
Part A Reference:

Part B Reference:

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:

<p>(Please continue on a separate sheet if necessary)</p>	
<p>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.</p>	

Signature:

A. P. Wilson

Date:

24.02.2021

Office Use Only
Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

Q1. To which document does this representation relate?

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- 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: 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.

1. BASIS OF COMMENTS

A) The current National Planning Policy Framework (NPPF) sets out:

16. Plans should:

- a) be prepared with the objective of contributing to the achievement development
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement planmakers and communities, local organisations, businesses, providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, decision maker should react to development proposals;

See attached response to Q.4 part-b-representation-form SCAP item 17 CD_SP26 (2 of 3)

(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 text of DP26 should be replaced in full with:

The delivery of sustainable communities in Shropshire relies on the provision of new strategic infrastructure and the continued operation of existing strategic infrastructure.

Proposals which are likely to affect an internationally designated wildlife site will require a project level HRA in accordance with Policy DP12.

See attached response to Q.5 part-b-representation-form SCAP item 17 CD_SP26 (3 of 3)

(Please continue on a separate sheet if necessary)

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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:

A. P. Wilson

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Shropshire Climate Action Partnership
------------------------	---------------------------------------

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:

Continuation of Response to Question 4

1. BASIS OF COMMENTS

A) The current National Planning Policy Framework (NPPF) sets out:

16. Plans should:

- a) be prepared with the objective of contributing to the achievement development
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement planmakers and communities, local organisations, businesses, providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, decision maker should react to development proposals;

Office Use Only	Part A Reference:
	Part B Reference:

20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision:

...

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

28. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

35. Local plans and spatial development strategies are examined to assess they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

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	Part B Reference:

These tests of soundness will be applied to non-strategic policies

in a proportionate way, taking into account the extent to which they are consistent with

relevant strategic policies for the area.

B) The Climate Change Act (2008) sets out:

Section 15 Duty to have regard to need for UK domestic action on climate change

(1) In exercising functions under this Part involving consideration of how to meet—

(a) the target in section 1(1) (the target for 2050), or

(b) the carbon budget for any period, the Secretary of State must have regard to the need for UK domestic action on climate change.

Section 58 Programme for adaptation to climate change

(1) It is the duty of the Secretary of State to lay programmes before Parliament setting out

(a) the objectives of Her Majesty's Government in the United Kingdom in relation to adaptation to climate change,

(b) the Government's proposals and policies for meeting those objectives, and

(c) the time-scales for introducing those proposals and policies, addressing the risks identified in the most recent report under section 56.

(2) The objectives, proposals and policies must be such as to contribute to sustainable development.

Section 61 Guidance by Secretary of State to reporting authorities

(1) The Secretary of State may issue guidance to reporting authorities about—

(a) assessing the current and predicted impact of climate change in relation to the authorities' functions,

(b) preparing proposals and policies for adapting to climate change in the exercise of their functions, and

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	Part B Reference:

(c) co-operating with other reporting authorities for that purpose.

Section 70 Interpretation

(1) In sections 61 to 69 and this section “reporting authority” means—

(a) a person or body with functions of a public nature,

(b) a person who is or is deemed to be a statutory undertaker for the purposes of any provision of—

(i) Part 11 of the Town and Country Planning Act 1990 (c. 8) (see section 262 of that Act),

C) DISCUSSION

The discussion considers how the requirements of the CCA are implicit in the NPPF and hence should be reflected in the appropriate part of a local plan, followed by how SP26 of the Shropshire Local plan is defective against this implied requirement and introduces constraints not supported by the NPPF.

1. What is the effect of the Climate Change Act (2008) (CCA) on the Local Plan under consideration?

Sec 15 (1) (b) suggests that domestic action is of relevance

Sec 58 (1) (b) sets out that HMG may set policies to meet the objectives of the Act (as may be modified by the Secretary of State)

Sec 61 (1) sets out that the Secretary of State may issue guidance to reporting authorities about how they prepare proposals and policies for adapting to climate change

Sec 70 (1) (b) (i) makes it clear that a reporting authority includes Shropshire Council.

It is therefore clear that the Secretary of State can influence the content of a Local Plan such as is being considered using the powers described above.

2. What is the relationship of the CCA to the National Planning Policy Framework?

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	Part B Reference:

The current NPPF refers to the CCA via a footnote [48] at para. 149: viz
149. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

It makes a more general reference to the objectives of the Act at para. 148:
148. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

3. What is the scope of NPPF policies?

The NPPF states:

20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

21. Plans should make explicit which policies are strategic policies.

These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any nonstrategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.

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	Part B Reference:

4. What guidance does the NPPF give regarding 'soundness'?

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

36. These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

5. How does this affect the preparation of the Local Plan under consideration?

- The NPPF implicitly reflects the CCA (2008) in its ambition to meet the objectives of the latter. This should be carried though to the content of Local Plans as these also need to support the objectives of the CCA (2008).

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	Part B Reference:

- Whilst the definition of ‘soundness’ requires consistency with the NPPF, it also supports ‘Justified – an appropriate strategy’.
- The Local Plan should regard the provision of energy as a strategic planning item and therefore not bound to more local policy expressed, for instance, through neighbourhood plans

For the Shropshire Local Plan, this requirement finds expression in DP26.

6. Is the present DP 26 fit for purpose?

In it’s present form, DP 26 is defective against the above considerations:

A) It differentiates between wind and non-wind renewables. This seems to follow from the NPPF and is not reflected in the CCA, thus the limitation is weak.

154. When determining planning applications for renewable and low carbon development, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- b) approve the application if its impacts are (or can be made) acceptable.*

[footnote 49: interpolated

Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.]

Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

Here, the requirement to consult the affected local community is ambiguous:

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	Part B Reference:

- i) it does not limit the scale of any such plan nor the implied scale of the ‘affected local community’, which could, for instance, be a number of civil parishes and
- ii) it does not state the scale of an ‘area’ that could be identified as suitable for development. The translation of this by the current DP26 into ‘an adopted Neighbourhood plan’ (4 .a) , which has a specific geographic constraint, is thus not supported by the NPPF.

B) Considerations (e.g. as set out in the Climate Change Committee Budget 6) indicate that the need for electricity generation in the UK will approximately double over the next 10 to 20 years.

This implicit limitation of scale in DP26 to the ‘very local’ makes it impossible for the Local Plan to allow appropriate renewable energy deployment at a scale that will allow Shropshire to fully meet its implicit commitment to national energy policy. It also impacts the ability of Shropshire to full use its natural resources for its own and regional economic development as set out at, for instance, SP12 5.b. and in its explanation at:

3.113. A key element of this aim is to move towards a ‘zero-carbon’ economy by encouraging greater use of renewable and ‘low carbon energy sources’ (i.e. wind, solar, hydro, biomass or nuclear energy) as an economic opportunity. This has the potential to offer lower energy costs and energy ‘independence’ provided by decentralised energy generation. This economic opportunity may

translate into lower production costs, greater ‘added value’ and a stronger asset base where the business owns or has a stake in decentralised energy generation technologies. This will assist the Shropshire economy by translating cleaner and greener energy usage into improved productivity and

greater resilience of businesses to withstand changes in our economic circumstances.

C) The separation between wind and non-wind renewable is not supported by the CCA, which makes no distinctions between the types of technologies needed to reduce greenhouse gases.

Para 4.230 of the Local Plan .is more positive.

It is equally important to ensure that new strategic infrastructure is positively considered where it will contribute to national priorities and/or locally identified requirements and this contribution outweighs any potential adverse impacts. Such infrastructure has the potential to support to the sustainability of

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	Part B Reference:

communities in Shropshire in the same was as existing strategic infrastructure.

In summary, DP26 has two major structural defects:

- a) It limits the ability of Shropshire Council to play its part in responding to national energy policy (as set out in the CCA) by placing differential limitations of the types of renewable energy that may be deployed (it is worth noting that such a limitation discriminates between 'urban' and 'rural' areas of the UK for this planning purpose and
- b) It imposes limits of the scale of such deployment by linking it to neighbourhood plans, where such linkage is not supported by the NPPF.

In addition, these restrictions make it inconsistent with other parts of the Local Plan, for instance at SP12, regarding economic development.

Office Use Only	Part A Reference:
	Part B Reference:

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:	Shropshire Climate Action Partnership
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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:

Continuation of Response to Question 5

The text of DP26 should be replaced in full with:

The delivery of sustainable communities in Shropshire relies on the provision of new strategic infrastructure and the continued operation of existing strategic infrastructure.

Proposals which are likely to affect an internationally designated wildlife site will require a project level HRA in accordance with Policy DP12.

Existing Strategic Infrastructure

1. Development will be expected to demonstrate that it will not adversely affect, either directly or indirectly, the continued operation and potential expansion of existing strategic infrastructure.

New Strategic Infrastructure

Office Use Only	Part A Reference:
	Part B Reference:

2. Renewable and low carbon development will be supported where its impact is, or can be made, acceptable. To aid in this determination, all applications should be accompanied by a strategic assessment, involving all affected communities, of the proposal's effect on the following during both the construction, operational and post-operational stages:

- a. Visual amenity (including the considerations within Policy DP17);
- b. Landscape character (including the considerations within Policy DP17);
- c. Natural assets (including the considerations within Policy DP12);
- d. Historic assets (including the considerations within Policy DP23);
- e. Air quality, noise and public amenity (including the considerations within Policy DP18);
- f. Water quality and water resources noise (including the considerations within Policy DP19);
- g. Traffic generation and the nature of vehicle movements;
- h. The Shropshire Hills AONB (including the considerations within Policy DP24);
- i. Hydropower applications should pay attention to fish stocks and normally be accompanied by a Flood Risk Assessment (see also Policy DP21);
- j. Biomass, energy from waste, biogas and anaerobic digestion proposals should also address the impact on vibration, odour and dust (the latter for biomass and energy from waste only). Opportunities to recover heat and power are encouraged in accordance with Policy SP3;
- k. Large scale proposals should show how they have made effective use of previously developed and non-agricultural land. Where a proposal requires the use of agricultural land, poorer quality land should be used in preference to land of a higher quality (see also Policy DP18). Proposals should allow for continued agricultural use wherever possible and/or encourage biodiversity improvements around installations; and
- l. Consideration of aircraft safety, (including defence operations).

3. In addition to the general provisions above at a-l above :

- a) For PV schemes the assessment should pay particular attention to the impact of glint and glare on neighbouring land uses and residential amenity.

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	Part B Reference:

b) For wind schemes the assessment should pay particular attention to turbine-generated noise and impact on bird movements.

4. The scale of installations should be assessed as a strategic planning issue.

5. The assessment should be proportionate to the development proposed and include sufficient information to allow for an accurate evaluation of all impacts, both negative and positive. It should cover necessary ancillary development such as security measures, lighting, access tracks and fencing. Impacts should be considered cumulatively against those existing or consented development types with similar impacts in the surrounding area. Mitigation measures to remove or reduce adverse impacts should be identified.

6. Monitoring and Decommissioning

a) Where planning permission establishes performance standards, applicants will be expected to demonstrate compliance through the submission of regular monitoring reports.

b) Proposals for temporary infrastructure will be expected to include measures for satisfactory restoration, including progressive restoration, of the site at the earliest practicable opportunity to an agreed after-use or to a state capable of beneficial after use.

c) Where appropriate, planning obligations will be sought in order to secure the after-use, long term management and maintenance of the site.

Office Use Only	Part A Reference:
	Part B Reference: