

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:	Michael Hymas, Stretton Climate Care
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Q1. To which document does this representation relate?

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

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

Paragraph: Policy: Site: Policies Map:

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

- A. Legally compliant Yes: 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. Stretton Climate Care was established as a registered charity in 2008 and has the main aim of reducing carbon emissions in our area. We work to engage with our local community to achieve this and more widely in seeking to influence decision makers and other bodies to reduce carbon emissions and encourage the generation of renewable energy and heat.
2. Since the Regulation 19 pre submission draft of the Shropshire Local Plan was published the government have published their response to the consultation on the amendments to the Building Regulations in relation to the Future Homes Standard (listed with links in Appendix 1). The intention is to make new regulations for an interim uplift in energy efficiency and associated measures for dwellings later this year which will come into practice in most cases by 2022. They are also proposing to require higher standards from 2025 and are currently consulting about further Continued

(Please continue on a separate sheet if necessary)

Stretton Climate Care- Representation to Shropshire Local Plan:
Continuation Sheets to Question 4 relating to Policy DP11

Continued

- 2 interim measures as well.
- 3 These measures will come into practice in most cases by 2022. They are also proposing to require higher standards from 2025 and are currently consulting about further interim measures as well. These measures would exceed the requirements of Paragraphs 1(b) and (c) of DP11. Therefore, it is possible that by the time of the Examination into the Shropshire Local Plan or at least by the date of adoption, Paragraphs 1(b) and (c) would be redundant in effect. It should also be noted that the government considered representations to prevent local planning authorities setting higher standards than required in national legislation and decided to maintain these powers for the time being. The government have therefore concluded in their response that the existing energy efficiency and renewable energy requirements for new dwellings are not satisfactory and are bringing forward an interim uplift in requirements as soon as possible and is also proposing to bring forward a more significant uplift in standards to be brought into effect in 2025. None of these uplifts would require any kind of viability test as they would not be part of the planning process but a requirement of the Building Regulations.
- 4 In addition to national policies set out in Paragraphs 148-154 of the NPPF and 12 paragraphs of the PPG, there is also a statutory duty to include policies in Local Plans to tackle climate change. (PPG Ref ID: 6-001-20140306 and ID: 6-002-20140306). Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) sets out a duty on local planning authorities to ensure that, taken as a whole, plan policy contributes to the mitigation of, and adaptation to, climate change. Policies must contribute to the Climate Change Act target regime. The Policy contains in sub Paragraph 4 a viability test which could effectively prevent the operation of this Policy in the many planning applications, particularly in the north of the County where viability is less assured. Shropshire has already been severely impacted by the effects of climate change with only 1°C of temperature increase, most noticeably with increasing frequency of flooding of the River Severn affecting Shrewsbury and communities downstream and severe storms that have led to at least one fatal road traffic incident caused by a falling tree. Shropshire Council has declared a climate emergency and intends to achieve net zero carbon emissions by 2030 for its own services. There is therefore a strong case backed by recent government policy announcements to require higher standards to mitigate climate change in new developments without further delay.
- 5 Paragraph 12 of PPG (ref ID: 6-012-20190315) constrains the scale of uplift for dwellings that could normally be required in a Local Plan. In our view, in the context of climate emergency, the statutory requirement for the mitigation of climate change and the government's acceptance of the need for an uplift in standards, the uplift in standards required in Paragraph 1(b) should not be constrained by the viability test in set out Paragraph 4 of Policy DP11. We consider that the interim uplift proposed by the government in their recent proposals for the Buildings Regulations set out in the Appendix to this representation should be required by Policy DP11.
- 6 The PPG states that there is no restriction on requiring an uplift in standards for non-residential property and in our view, it is not necessary nor appropriate to apply the viability test to non-residential development and therefore Paragraph 4 should not apply to the requirements of Paragraph 2.

Stretton Climate Care- Representation to Shropshire Local Plan: Continuation Sheets to Question 4 relating to Policy DP11

- 7 Paragraph 1(a) includes requirements to maximise fabric energy efficiency and air tightness which could be interpreted to mean standards at or exceeding Passivhaus standards. If “maximise” and “maximising” was replaced with “high levels of” then it should be possible to remove this paragraph from the viability test of Paragraph 4 of the Policy. It is also proposed to delete the word “fabric” because the following list is wider than fabric efficiency.
- 8 Our experience from the operation of the previous version of the SAMDev Local Plan was that where policies were optional based on words like encouraging and maximising, such uplifts in environmental performance standards rarely happened. We recognise that viability of the development is an issue, including affordable housing but the future viability of our planet has to be considered as a first priority and it should be recognised that mitigating climate change is a statutory requirement. In our experience, with hundreds of existing homes it is very difficult and sometimes practically impossible to raise energy efficiency standards of buildings constructed under the many previous energy efficiency codes. To carry on building developments that do not meet improved standards would be damaging to our climate and not in accordance with the overall statutory duty to mitigate climate change.
- 9 Appendix 4 of the pre-submission Regulation 19 draft of the Shropshire Local Plan sets out the monitoring arrangements. For Policy DP11 two criteria are put forward, amongst others, that will not provide any future data as they rely on Feed in Tariffs which were abolished at the end of March 2019. It is clear that the monitoring arrangements for this Policy which has no targets for reductions in carbon dioxide emissions nor production of renewable energy need to be reviewed and improved.
- 10 We submit that without the modifications we have put forward, Policy DP11 is unsound and not in compliance with statutory duty contained in Section 19 of the Planning and Compulsory Purchase Act 2004 as amended as it would not adequately mitigate climate change.

Appendix 1

The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings

Summary of responses received and Government response

The Future Buildings Standard Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for non-domestic buildings and dwellings; and overheating in new residential buildings

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953718/Future_Buildings_Standard_consultation_document.pdf

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

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

Please see attached sheet

(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 respond to any issues or questions that might arise in relation to our representation.

(Please continue on a separate sheet if necessary)

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

Signature:

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Stretton Climate care
Continuation Sheet to Policy DP11 Question 5

Modify Paragraphs 1(a) and 1(b) to read:

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

a. Being designed to achieve levels of energy efficiency higher than the 2013 Building Regulations including such measures as: building orientation; high levels of insulation of roofs, floors and walls; airtightness and using solar gain through window/door orientation whilst avoiding overheating and:

b. Ensuring all proposals for dwellings achieve a minimum of 31% reduction in the generation of carbon emissions compared to the requirement in Part L of the 2013 Building Regulations and improve fabric efficiency as set out in the proposed interim uplift to Building Regulations, until such time as the Building Regulations are increased to a level which meets or exceeds this uplift and:”

Modify Paragraph 4 to read:

“4. The requirements expressed in paragraphs 1 (c) and 1(d) and paragraph 3 of 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.”

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Part B: Representation

Name and Organisation:	Michael Hymas Stretton Climate Care
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Q1. To which document does this representation relate?

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- (Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="DP23"/>	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 type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).

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There is no requirement in this Policy to incorporate energy efficiency and renewable energy into works relating to Shropshire's heritage assets. While it could be inferred that Policy DP11 applies to these proposals, it should be made explicit by the inclusion of an additional paragraph to this effect:

All such proposals will incorporate wherever appropriate the sensitive retrofitting of energy efficiency measures and renewable energy and heat sources.

A revised supplementary planning document should positively guide the incorporation of such measures.

This change is necessary in the context of the Guidance in the NPPF paragraphs 149 and 151 and in accordance with statutory duty set out in Section 19 of the Planning and Compulsory Purchase Act 2004 as amended to ensure that, taken as a whole, the plan policy contributes to the mitigation of climate change.

(Please continue on a separate sheet if necessary)

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Insert additional Paragraph 8:

All such proposals will incorporate, wherever appropriate, the sensitive retrofitting of energy efficiency measures and renewable energy and heat sources.

(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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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:

In order to respond to any issues or questions that may arise.

(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.*

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Date: 25/02/2021

Office Use Only

Part A Reference:

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1. Stretton Climate Care was established as a registered charity in 2008 and has the main aim of reducing carbon emissions in our area. We work to engage with our local community to achieve this and more widely in seeking to influence decision makers and other bodies to reduce carbon emissions and encourage the generation of renewable energy and heat.
 2. Our representation relates to the virtual prohibition of wind energy development in Shropshire by Policy DP26 of the Local Plan. Sub paragraph 4 of Policy DP26 adds an additional requirement to the general criteria for renewable energy proposals that requires proposals for wind energy (excluding microgeneration) to be within an area identified as suitable in an adopted Neighbourhood Plan and that the planning impacts identified by affected local communities have been fully addressed and the proposal has their backing.
- Continued on a separate sheet

(Please continue on a separate sheet if necessary)

Stretton Climate Care- Representation to Shropshire Local Plan:
Continuation Sheets to Question 4 relating to Policy DP26

- 3 Policy DP26 does not define what is meant by microgeneration turbines but in a recent appeal decision in Wychavon District Council, turbines with a rotor diameter of 13.1 metres and a tip height of 25 metres were considered to be micro turbines. (Appeal ref APP/H1840/W/20/3249183).
We assume in our statement that this is what Shropshire Council intended to be covered by the exemption as no definition is provided.
- 4 On the face of it, it might appear that DP26 does conform to Paragraph 151-153 of the NPPF together with footnote 149. However, our case is that Shropshire Council had adequate time and opportunity to define which areas of the County might be suitable for wind power and provide positive strategy for energy from wind power as required by Paragraph 151 (a) rather than the negative and restrictive approach they have adopted. We would also draw attention to Paragraph 032 Reference ID: 6-001-20140306 of Planning Practice Guidance which also states the importance of supporting the delivery of green energy. Addressing climate change is one of the core land use planning principles. “To be found sound, Local Plans will need to reflect this principle.....” In this statement our intention is to demonstrate that the potential for wind power in the County is high and it is a component of renewable energy in Shropshire that is so important that to exclude such development from the local Plan results in an unsound Plan. Furthermore, as Section 19 of the Planning and Compulsory Purchase Act 2004 as amended requires that taken as a whole, plan policy contributes to the mitigation of climate change. Clearly this duty does not mean just one plan policy contributes to the mitigation of climate change. Neither does it state that every plan policy must contribute to mitigating climate change. Our view is that the potential for generating wind power is of more than county wide significance, it is of regional significance and that effectively preventing its development in the Plan means that it is in breach of this statutory duty.
- 5 As required by the Local Plan, a potential developer of a wind turbine would have to approach a Parish Council and persuade them to prepare a Neighbourhood Plan. Most rural Parish Councils in Shropshire will not expect to make proposals for any other types of development in a Neighbourhood Plan. A good proportion have populations of some 1000 or less and a rate precept of a few hundred pounds. These are the sort of low population areas which might be suitable for wind energy. For many small rural parishes, it would probably result as a single-issue Neighbourhood Plan on that basis and not be an attractive option for a small Parish Council. Furthermore, as well the costs and difficulties of the process, a Neighbourhood Plan could take several years to complete. It is clearly outside the ability or financial means of the great majority of small rural parish Councils in Shropshire. The Policy will therefore inevitably result in what the Inspector in the Wychavon appeal (ref APP/H1840/W/20/3249183) described as a lacuna. He appeared to be dissatisfied with the Policy framework he was presented with. It appears that the Council intend the policy as drafted to result in an effective ban on wind energy developments except for micro turbines but in practice it may result in some uncertainty if the Appeal decision in Wychavon is followed by other Inspectors. We hope it is helpful to set out the steps Shropshire Council took to arrive at a position where in our view the Local Plan is unsound because of a lack of a positive strategy for energy from wind power.
- 6 Stretton Climate Care raised concerns about lack of consideration of climate change at an early stage of the Review process. Paragraph 16 of the NPPF states that Local Plans should shaped by early, proportionate and effective engagement between planmakers and local organisations. Unfortunately, that has not occurred in our case. We have at all stages maintained a measured and clear dialogue with Shropshire Council but their approach to climate change during the Local Plan Review has been lacking.
- 7 In March 2017 we submitted a Response to the Review of the Local Plan which highlighted the need to address climate change and the current Policies which were not adequately tackling this problem. This included the need to encourage renewable energy. (see Appendix 1). Our submission was excluded from the Summary of Responses published by Shropshire Council in August 2017. We were advised that the

Stretton Climate Care- Representation to Shropshire Local Plan: Continuation Sheets to Question 4 relating to Policy DP26

Summary related to the questions asked and presumably our response did not merit inclusion on that basis.

- 8 We raised our concerns about this approach as set out in Appendix 2 and received reassurance that the Council would address climate change issues. We received the Response copied into Appendix 3 in November 2017.
This reiterated the Statement made in Paragraph 7.5 of the Shropshire Local Plan Preferred Options Report that said amongst other things:
“The Council will identify the criteria for the selection of areas suitable for wind energy development in Shropshire and carry out a countywide assessment to inform the later stages of the Local Plan Review.”
- 9 We responded to the Preferred Options Report on 21st December 2017 (set out in Appendix 4) stating our support for the Council’s approach to wind power as set out in Paragraph 7.5 of the Options Report (not Paragraph 7.4 as stated in the Council’s Statement in Appendix 3).
Our comments were not adequately summarised in the Council’s Summary of Responses and we submitted a complaint about this (included as Appendix 5) as this lack of inclusion had occurred previously and it seemed to us a deliberate policy to suppress any comments relating to climate change issues and ensure that members of the public and members of council were kept un-informed on this issue. The Council’s response is included as Appendix 7 and rejects our complaint but shows that climate change was not recorded as an issue in the summary. This continued the pattern that had been adopted by Shropshire Council which had already been the subject of representations. The letter also said:
 Until that time, the authority wishes to continue to work with Stretton Climate Care to address those environmental matters that should be included in the emerging Local Plan.
Despite this, no further contact was received by Stretton Climate Care on these issues until the Regulation 18 draft of the Shropshire Local Plan was published. Shropshire Council declared a climate change emergency in May 2019.
- 10 On 3 August 2020 Shropshire Council published the Regulation 18 pre-submission draft of the Local Plan. The Plan contained no Policy in relation to wind power and there were no documents of evidence lodged relating to wind power. This was surprising in the context of the previous statements and we submitted a Freedom of Information Request on 1st September 2020 to discover how this omission had occurred. This is attached as Appendix 5. The response made on 23 September 2020 which is included at Appendix 8 did not explain the reason why the stated intention to include wind power in the Local Plan had been dropped.
- 11 On 27 September 2020 we submitted our response to the Regulation 18 draft Shropshire Local Plan. Our comments on Policy SP3-climate change- are set out in Appendix 9. We suggested that this draft of the Local Plan displayed complacency and misunderstanding of climate change issues and included no policy to encourage or manage the development of solar power or wind energy.
- 12 Wind power is a very important potential resource for generating renewable electricity both for the county and in regional terms. It also produces renewable electricity at comparatively low cost. In March 2019 the Council’s Place Overview Committee considered a Report on the Corporate Climate Change Strategy. The Strategy Report included a Table on Page 27 of the Report Pack
<https://shropshire.gov.uk/committee-services/documents/b13230/To%20Follow%20Reports%20and%20Presentations%2028th-Mar-2019%2010.00%20Place%20Overview%20Committee.pdf?T=9> showing the potential Renewable Energy in the Marches Area. (Brisely et al., 2011). Shropshire has a potential renewable capacity over 10GW which equates to 20% of the West Midlands total electricity demand (DECC, 2010). Of this potential renewable energy over 9GW was from wind power-mostly large scale turbines. This shows that this resource is of regional importance as well as countywide importance. On 19th December 2019 Shropshire

Stretton Climate Care- Representation to Shropshire Local Plan:
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Council approved a Climate Change Strategy Framework <https://shropshire.gov.uk/committee-services/documents/s23757/Climate%20Change%20Strategy%20Framework%20Final%20sent%202.pdf> which on Page 12 includes wind power as one of the themes that the Council can use to reduce its carbon footprint. When the Regulation 18 draft Plan was issued only some 9 months later without any evidence base or Policies for wind power, it appeared to us as a great surprise, disappointing and unexplained U-turn by Shropshire Council.

- 13 Without enabling the development of wind power in Shropshire it cannot be justified that the Shropshire Local Plan has a positive strategy for renewable energy as required by the relevant paragraphs of the NPPF and the PPG and the Local Plan should be assessed as unsound. Overall Policy DP26 has a negative approach to renewable energy with basically a checklist to set out all the reasons it should not proceed. This is not the required positive approach to mitigating climate change as required by Section 19 of the Planning and Compulsory Purchase Act 2004 as amended. We submit that the Plan as submitted is in breach of this statutory duty.

Appendix 1 15th March 2017

Partial Review of the Shropshire Local Plan- A Response

1. Stretton Climate Care is a charity based in Church Stretton with a mission to reduce carbon emissions. It has been operating now for nearly 10 years and during this time has encouraged its local community, public organisations and other bodies to address the vital issue of climate change. The Trustees of Stretton Climate Care have approved this statement.
2. We were pleased that the current Core Strategy recognised Climate Change as one of the 3 priorities that the Local Plan must address and that promoting a low carbon Shropshire is one of the strategic priorities. While we understand that Review is intended to be of limited scope, we submit that the Review should include an appraisal of whether the Plan is actually delivering the low carbon Shropshire that was envisaged. There is strong evidence that since the Core Strategy was adopted the case for tackling carbon emissions has become even stronger. However there is evidence that the policies in the Core Strategy are not satisfactorily achieving this strategic priority relating to climate change.
3. Since the Core Strategy and SAMDev were adopted, the UK has signed up to the Paris Convention on climate change with the intention of limiting temperature increases to 2°C. At the same time, global climate monitoring has continued to record increasing temperatures taking the world on a trajectory where global temperatures will significantly exceed the 2°C target. The Town and Country Planning Association published Planning for the Climate Change Challenge <https://www.tcpa.org.uk/planning-for-the-climate-challenge> in Autumn 2016. This Report, based on national research, demonstrated that Local Plans are not addressing the need to reduce carbon emissions effectively, nor are they dealing with the necessary adaptation actions adequately. This is also true for Shropshire.
4. Shropshire has already experienced some impacts of climate change with flooding, infrastructure damage and problems affecting health including spreading diseases and heatstroke and so on. The effects will be substantially magnified as global temperatures rise further. Extreme weather events will become more likely; it would be wise to adopt the precautionary principle. The Committee on Climate Change has recently published its 2000 page Climate Change Risk Assessment detailing the risks we face and the current measures in hand. <https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/climate-change-risk-assessment-2017/> The Committee has identified the

Stretton Climate Care- Representation to Shropshire Local Plan:
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need for urgent action in a range of issues relevant to planning and development.

5. Unfortunately, Shropshire's SPD on Sustainable Design Part 1 does not appear to have been effective in securing improvements in energy efficiency of housing, commercial developments and other aspects of sustainability. Furthermore, Part 2 on Design and other issues has not been produced because of resource constraints. We believe there is an urgent need for the Plan to be revised to address climate change more effectively through revised policies in particular to achieve higher standards of energy efficiency and the need to conserve water resources using grey water and water minimising appliances. There is also a need to ensure that buildings can maintain suitable temperatures in summer through natural ventilation systems. Planning Practice Guidance published by DCLG in June 2014 also recommends multi-functional green infrastructure addressing a range of climate related issues including urban heat islands, flooding and encouraging walking and cycling. This Guidance was published after the drafting of SAMDev.
6. As well as higher standards of new development, we consider that the Local Plan should provide a clearer framework to encourage the improvement of the energy efficiency of existing housing as current rates of progress are inadequate.
<http://www.ukgbc.org/sites/default/files/A%20housing%20stock%20fit%20for%20the%20future%20-%20Making%20home%20energy%20efficiency%20a%20national%20infrastructure%20priority.pdf> Owners of properties can face difficulties with the requirements to safeguard local character which conflict with the installation of energy efficiency measures. As a result, carbon emissions are not being curtailed.
7. Greater support should be given to the local generation of renewable energy. Too many developments are being discouraged. Large scale agricultural buildings often make far more visual impact than the low scale solar farms which have been refused permission. A massive increase in electrical power will be needed from renewable sources as we reduce our reliance on fossil fuels. We hope that the developments planned for Ironbridge power station can include Solar PV as the infrastructure must be available to support this. Over the period of the revised Plan, electrification of the rail system would also be appropriate, together with electric buses which will need new infrastructure.
8. We regret strongly that Shropshire has not supported the increasing shift to electric vehicles by ensuring the provision of chargepoints which have been installed extensively in other counties. It is clear that to reduce carbon emissions and secure acceptable air quality there will need to be a rapid conversion to electric vehicles of all types. The Local Plan should require suitable chargepoints to be installed as part of new developments, particularly where residential areas rely on communal parking areas and in parking areas associated with shopping and commercial developments
9. The Local Plan also needs to identify how adaptation should be prioritised in Shropshire. Key infrastructure and properties are at risk from flooding. For example, there have previously been discussions about large scale winter storage of water upstream of Shrewsbury to alleviate flooding downstream, and this may be an issue which should be considered by the Review of the Local Plan.

We believe that we have clearly demonstrated that climate change should remain a priority for the Local Plan and that there is an urgent need to Review and alter the current policies to properly address the issues we have identified. While there are severe resource constraints, there is a statutory requirement for the Council to review the Plan where it is clear that current policies are no longer adequate or appropriate.

Stretton Climate Care- Representation to Shropshire Local Plan:
Continuation Sheets to Question 4 relating to Policy DP26

Appendix 2 5th October 2017

Adrian Cooper
Planning Policy & Strategy Manager
Shropshire Council
The Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Dear Adrian

Local Plan Review

Earlier this year we had a telephone discussion in which I explained our concerns about rolling forward the Local Plan without adequate consideration being given to the changes which have occurred in relation to Climate Change and similar issues.

We submitted our response highlighting the urgent need to consider these issues along with partial Review you are progressing. This document was submitted on 15th March 2017 and is attached as an Appendix to this letter.

The Issues and Strategic Options Consultation Response Summary which was published in August 2017 contains no reference to the issues we raised. Lindsay Short advised me in response to my enquiry:

“The document Issues and Strategic Options Consultation Response Summary is a broad summary of all the consultations received. It does not refer to any specific response but is a summary covering the issues raised by all respondents. “

Well clearly the document does not cover the issues we raised. These issues do not appear to have been reported to the Cabinet either. I am not clear whether this was a deliberate decision to avoid mentioning these issues or whether because they did not fit into the questions raised were missed. Either way, it seems to me that these are not issues which can or should be ignored as the Local Plan is rolled forward.

The Trustees of Stretton Climate Care would like to hear how you intend to address the issues raised. It seems to me that simply ignoring them and us and not reporting issues raised to Cabinet is a risky strategy for the Council to pursue.

I look forward to hearing from you.

Best wishes
Yours sincerely

Mike Hymas

Appendix 3 3rd November 2017

Policy Statement by Shropshire Council

Sustainability and Climate Change

Shropshire Council recognises the need for their Local Plan Review to address the challenges of climate change as expressed by respondents to the Issues and Strategic Options Consultation. The consultation responses to the Issues and Strategic Options have identified the following issues:

- Climate change needs to be addressed in the Local Plan review and the review should;
 - continue to promote a Low Carbon Shropshire;
 - seek to avoid or mitigate the health effects and implications of rising temperatures, flood risk and infrastructure damage;
 - capture the combined benefits of renewable energy generation, energy efficiency measures and the contribution from electric vehicles and green infrastructure.
- Consultation responses relating to climate change may have been disregarded because the:
 - Strategic Options Consultation Response Summary does not record any of these matters;
 - Cabinet Report for the Preferred Option for the Scale and Distribution of Development does not refer directly to these matters.

Responses also refer to the Paris Convention on Climate Change, the Climate Change Risk Assessment from the Committee on Climate Change and the guidance in the Planning for Climate Change Challenge Report published by the Town and Country Planning Association. Attention is also drawn to the Planning Policy Guidance on Climate Change and Planning Inspectorate decision to seek to summarise the response to climate change in the report template for the Examination of Local Plans.

Shropshire Council appreciate the contribution from these respondents and wish to provide assurance that matters relating to sustainability particularly the management of climate change are considered to be important and will be addressed in the Local Plan review. Shropshire Council is addressing these matters in accordance with the guidance in the National Planning Policy Framework (NPPF) recognises the stipulation at paragraph 6 that *'the purpose of the planning system is to contribute to the achievement of sustainable development'*. This requires Local Planning Authorities to assess the sustainability of each component of the Local Plan rather than considering sustainability as a separate and distinct component of the plan or merely as a test of its 'soundness'.

The NPPF identifies this in paragraph 7, which states that sustainability is expressed through the economic, social and environmental dimensions of a Local Plan. This requires the exercise of sound planning judgement to achieve an acceptable balance between all three components. This is summarised in the NPPF through the advice that: the exercise of sound planning judgement should deliver the five guiding principles in the UK Sustainable Development Strategy: 'Securing the Future' to:

- live within the planet's environmental limits;
- ensure a strong, healthy and just society;
- achieve a sustainable economy;
- promote good governance; and
- use sound science responsibly.

The NPPF further explains this position in paragraph 7, that the Government's approach to the practice of delivering sustainable development cannot be captured in a single statement. The Government's approach is expressed through the full range of national policies which are to be delivered through the planning system. The NPPF further states at paragraph 14 that planning authorities must set out their presumption in favour of sustainable development as a 'golden thread' running through their Local Plan. Shropshire Council wishes to ensure the presumption for sustainable development in the Local Plan Review will satisfy the objectives of the guiding principles in the UK Sustainable Development Strategy.

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This requires Shropshire Council to establish an appropriate strategy for their administrative area by determining the scale and distribution of development necessary to meet the needs and demands of our communities. This is now set out in the Preferred Option for the Local Plan Review, which is now open to consultation and all responses are welcome before the closing date on 22nd December 2017.

A key element is to test whether the Preferred Option will enable our communities to live within the environmental means of the County. Shropshire Council has started to address this matter through the Sustainability Assessment and Habitats Regulations Assessment deposited with the Preferred Option, identified in paragraph 3.4 of the Cabinet Report for the Preferred Option available at: <https://shropshire.gov.uk/committee-services/ieListDocuments.aspx?CId=130&MId=3421&Ver=4>. These assessments pay due regard to the measures to manage the proposed scale of development especially through the proposed distribution of development. This will principally seek opportunities for development within our principal settlements through an Urban Focus. This seeks to offer more sustainable patterns of living and to prioritise investment in strategic corridors using road and rail connections to provide greater connectivity with a choice of transport modes.

In paragraph 7.4 of the Preferred Option, it is recognised that Shropshire must explore the potential for wind energy development to contribute to renewable energy provision alongside solar power and local energy generation in the County. The Preferred Option in paragraph 7.5 also supports the development of a circular economy through the active recovery of material resources and the production of energy from waste to contribute to achieving a low carbon economy and society.

The provisions of the Local Plan will supplement the existing requirements of the regulatory regimes of the Development Management, Building Control and other services administered by Shropshire Council. These services already address matters of public health, flood risk, infrastructure capacity, open space, the improvement of broadband connectivity and the move towards the electrification of road vehicles currently through the provision of charging points in residential properties.

The previous consultation on the Issues and Strategic Options for the Local Plan review will also serve to inform the process of achieving a sustainable strategy for Shropshire. These responses set out preferences, justifications and advice, which is summarised in the *Issues and Strategic Options Response Summary* (July 2017) available at: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/evidence-base-and-supporting-documents/>. This document, with the breadth of formal guidance and advice, will support our approach to ensuring the sustainability and addressing the climate change challenges of our presumption in favour of sustainable development. In particular, the summary responses to the previous consultation raise the following important matters:

- utilising the settlement hierarchy and focusing on brownfield opportunities for growth; (page 10)
- managing travel patterns to deliver sustainable economic growth through balanced, mixed use development and sustainable travel behaviours including the use of Travel Plans; (page 7)
- to capture the opportunities of clean power and 'electric' vehicles for business use; (page 11)
- locating development in rural service centres to support sustainable communities; (page 15)
- seeking sustainable energy solutions to achieve energy conservation targets and seeking quality of life improvements through the management of change and growth; (page 8)
- managing the impacts of climate change, within the challenges of Brexit, to capture larger sites for investment and growth in accessible locations offering suitable existing and new physical, social and communications infrastructure including investment in new technology; (pages 7 and 8)
- ensuring the scale of growth will conserve the heritage and natural environment of the County including the Shropshire Hills AONB; (page 6).

The assessments and advice above, will inform the process of ensuring the sustainability of each element of the Local Plan strategy and along with current regulatory measures, will help to address the climate change challenge in Shropshire. This approach will continue as we move forward with the preparation of the Local Plan Review and seek to achieve the sustainability objectives of the NPPF.

Appendix 4 21st December 2017



Registered Charity

No. 1159816

www.strettonclimatecare.org.uk

Shropshire Local Plan Review Consultation on Preferred Scale and Distribution of Development

Introduction

1. We were disappointed that our Submission on the first Stage Consultation-Issues and Strategic Options Consultation was not included in the Summary of Responses. Although we have subsequently received a Statement from Shropshire Council entitled Sustainability and Climate Change which states a commitment to properly addressing environmental sustainability issues including climate change, we have not seen much evidence that this approach was applied to the current Consultation. We remain very concerned that Climate Change and other environmental issues have not been satisfactorily addressed in the Local Plan Review. We hope that this will change.

Strategic Objectives

2. While we accept that the main focus of the Review is on housing and employment allocations, these raise associated environmental issues including additional carbon emissions. However, the strategic Objectives of the Review do not contain any substantial or specific reference to climate change and environmental issues. In the Core Strategy, Objective 9 is:

Promote a low carbon Shropshire, delivering development which mitigates and adapts to the effects of climate change, including flood risk, by promoting more responsible transport and travel choices, more efficient use of energy and resources, the generation of energy from renewable resources and effective and sustainable waste management”

3. We can see from the Sustainability Appraisal that these issues are being superficially considered but we consider it important that they are also reflected in the Objectives of the Review. An additional Object or Objects of the Review should be added to ensure that the Review appropriately addresses the Objectives set out in Objective 9 above. There are also environmental issues such as air quality and management of water resources that need to be addressed in the context of the pressures to allocate more land for housing and employment.

Evidence Base and the development of Policies for Sustainability and Climate Change

4. We believe that it is essential for the Evidence Base to be updated with surveys identifying the scope for renewable energy development to be developed alongside the growth envisaged in the

Stretton Climate Care- Representation to Shropshire Local Plan: Continuation Sheets to Question 4 relating to Policy DP26

Plan; but also to identify and include policies on how Shropshire can decarbonise in line with national requirements. Understanding the current position in relation to carbon emissions, renewable energy and scope for renewable energy is crucially important. Wind power and solar power have particular locational and infrastructure requirements that need to be understood so that appropriate Policies can be put forward to ensure that significantly more renewable power is generated in Shropshire. The redevelopment of Buildwas power station provides a good opportunity for both solar power and battery storage with its excellent grid connections.

5. For example the scope for Combined Heat and Power (CHP) Systems needs to be included, possibly combining commercial and/or leisure developments with housing. The council's likely purchase of the Shrewsbury's shopping centres provides an opportunity which could be realised for CHP and neighbourhood heating but the Local Plan needs to incorporate policies that require such schemes to be incorporated. School sites with swimming pools, which inevitably have a large energy demand, could also be examined in relation to the potential for Combined Heat and Power and Neighbourhood Heating schemes. We would be interested in the potential for this being examined in Church Stretton. Their remains unfulfilled potential in using waste heat at the Battlefield Energy Recovery Facility demonstrating the need for stronger planning policies to ensure that opportunities are realised.

The state of the current housing stock in relation to the government's intention to decarbonise this aspect of energy by 2030 needs to be understood as part of the Evidence Base. It should identify what actions will be needed in relation to the housing stock in terms of development. The current restrictions on alterations to the external appearance of dwellings in Conservation Areas will have to be relaxed to enable satisfactory levels of insulation and energy efficiency to be achieved.

6. Understanding the energy efficiency and carbon emissions from all other development should be part of the Evidence Base as well. This information will ensure that the Review can assess and provide appropriate Policies to address the massive changes that will be needed to de-carbonise Shropshire as required by The Climate Change Act 2008. It may well be that many buildings will no longer be fit for the purpose that they were constructed. This has already occurred with many post war office blocks which cannot be viably upgraded to meet energy efficiency standards.
7. The implications of low emission vehicles should also be considered, together with infrastructure they may require. Although sale of Internal Combustion Engine cars will be prohibited by 2040, it is very likely that before this date, during the Plan period, sales of electric vehicles will become predominant. Together with increasing autonomous driving capabilities, the increasing predominance of such vehicles will have significant implications for housing and employment development and the associated infrastructure. We have already seen the first all-electric HGV launched and by 2036 they will be the vehicle of choice. If Haulage Depots are to become recharging points for large numbers of Heavy Goods Vehicles, they may require significant reinforcement of the electricity network. The Evidence Base should consider whether large battery installations may also become commonplace alongside large scale solar installations and the implications for planning policies needs to be analysed.

Additional development must be sustainable, reduce carbon emissions and reduce and mitigate other environmental impacts

8. It makes no sense to be building houses that will need to have significant modifications within a decade of their construction. Shropshire should aim to require all housing developments to be Zero Carbon as soon and as far as possible. The process set out in the current Supplementary Planning Document-Sustainable Design Part 1 appears to be a failure at achieving any improvement in energy efficiency or conservation of water resources. This must be addressed with new requirements in the current Review.
9. The Sustainability Appraisal notes that larger developments concentrated in larger settlements provide more opportunities for more sustainable development; but this alone is totally inadequate unless these opportunities are required to be implemented through appropriate policies in the Plan. Just because there are opportunities for more sustainable methods of construction does not mean that housebuilders will take them up if the alternative costs less or is easier or quicker. The Plan must contain clear policies to ensure the implementation of these opportunities. Otherwise there is a risk that the Sustainability Appraisal is based on generalised aspirations or assertions rather than what will be required or what will be permitted and the result will be an increase in carbon emissions, a diminution in our already poor air quality and damage to environmental assets. To have another decade of squandering our water resources and generating excess carbon emissions despite the opportunity to address these issues would not be in accordance with the objectives of the Core Strategy nor with the NPPF requirements for sustainable development.
10. One individual development rarely has the scale to justify a brand new public transport service. In the current straitened financial circumstances of the Council, the subsidies for public transport are bound to further diminish and this will also damage the commercial network. There must be doubt that sustainable transport solutions will be attainable without funding from the development itself, and suitable enabling policies should be included in the Plan.
11. We can see that massive capital investment in major roads schemes is being contemplated. There needs to be a similar approach to public transport to make this an attractive alternative to using the car. The Council should study the approach being taken in Cambridge and environs for example. Suitable Policies should be included in the Plan to encourage and facilitate such infrastructure to be built. In particular electrification of the rail network should be promoted.

Wind Energy

12. We support the principle set out in Paragraph 7.5 of allocating areas suitable for wind power energy.
13. There will also be requirements for substantial battery installations alongside solar power farms and consideration needs to be given to these in the Review.

Adaptation

14. Climate Change is here now and will continue to almost certainly an increase of 2°C worldwide. This already having adverse consequences and by the end of the Plan period at 2036 greater flooding, severe storms and overheating in towns will become a more serious problem. If summer droughts become more normal in the county, water resources will become an even more pressing issue. The Plan needs to address what adaptations need to be made in Shropshire to tackle these issues. Reducing flooding from the Severn with winter storage upstream of Shrewsbury could bring significant environmental benefits and may be much better than the piecemeal approach to date. The Plan needs appropriate policies for these issues.

15. The Plan's policies should require that new housing developments incorporate electric vehicle charging facilities where parking is provided communally bearing in mind that there are forecast to be several million electric vehicles by the end of the Plan period. Large parking areas associated with retail and employment facilities should be required to include electric vehicle charging facilities.

Yours faithfully

Michael Hymas
Secretary

Appendix 5 25th May 2018

Clive Wright
Chief Executive
Shropshire Council
The Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

25th May 2018

Dear Clive Wright

Complaint relating to Shropshire Local Plan Review

Stretton Climate Care wrote a submission (attached) responding to the consultation scale and distribution of growth consultation. We do not think it is satisfactory or adequate that our response has been summarised in the Preferred Scale and Distribution of Development Consultation Response Summary

<https://shropshire.gov.uk/media/9632/preferred-scale-and-distribution-of-development-consultation-response-summary.pdf>

as

- *Concerns were raised over the ecological and environmental impacts of development*

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The Local Plan process is a political process unlike development management and in these circumstances it is important that expressed concerns are communicated to Members and other participants. This cannot be achieved if the views expressed are not communicated because the published summary is grossly inadequate. We would like the summary to be amended to cover all the main points submitted.

Although the Cabinet Report 2 May 2018-Shropshire Council Local Plan Review states:

A detailed summary of the representations is available on the Council's webpages using the weblink provided in the list of background papers below.

The summary is clearly not detailed in the case of our representations.

We have made this formal complaint because it follows similar representations we made following the previous consultation process. In this case we made representations direct to the Planning Policy Manager, Adrian Cooper.

Some extracts from our correspondence is attached.

I suggest you consider whether maladministration has occurred or whether the procedures followed are likely to damage the integrity of the local plan process.

I look forward to your response.

Yours sincerely

Michael Hymas

Secretary

Stretton Climate Care- Representation to Shropshire Local Plan:
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Appendix 6 5th July 2018

Stretton Climate Care

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

FAO: Michael Hymas
Date 5th July 2018
Darwin Ref: CAS: 1738122

Dear Mr Hymas,
Complaint: Planning Policy and Strategy Team – Shropshire Local Plan Review

Further to your letter of complaint 25th May 2018, this has been dealt with under the Corporate Complaints procedure and I wish to report back on the issues raised. I am sorry you are dissatisfied with the way the submission by Stretton Climate Care has been handled and hope this response will offer some degree of reassurance.

My understanding of your complaint is that your concern relates to the conclusion that the Stretton Climate Care submission is summarised by a single point in the Preferred Scale and Distribution of Development (PSDD), Consultation Response Summary, which states *'concerns were raised over the ecological and environmental impacts of development'* (Further Comments, page. 16). Stretton Climate Care presented a broad range of matters about Climate Change and the environment which included air quality/emissions, construction standards, energy efficiency, flooding, public transport, renewable energy and water resources and they are disappointed with this single point as a summary.

In considering the issues I have:

- Identified the matters raised in the submission by Stretton Climate Care;
- Checked the summary of responses in the Preferred Scale and Distribution of Development (PSDD), Consultation Response Summary.

Having done all of this I have come to the conclusions that in the PSDD Consultation Response Summary the general, cautionary point noted above does refer to Stretton Climate Care among other respondents. However, this is an important precautionary point that acted as a key guiding principle for the Sustainability Appraisal of the PSDD consultation document.

In addition, the Response Summary also contains a number of other summary points about the environmental risks associated with the different elements of the PSDD. These points, and our precautionary principle above, also respond to many of the matters presented by Stretton Climate Care. These further points, that bridge the principal elements of the PSDD, are listed below:

- *'Concern expressed over the potential for adverse environmental impacts resulting from the 'high' growth option'* (Housing Requirement, page 3);
- *'To be truly sustainable, our economic strategy must have positive environmental effects'* (Employment Land Requirement, page 4);

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- '*Protecting the environmental and aesthetic qualities of the rural area from unsustainable development*' (Distribution of Future Growth, page 5);
- '*Guidelines (for settlements) must reflect physical, heritage and environmental constraints*' (Settlement Strategies, page 6);
- '*(seeking) Opportunities to enhance the environment*' (Managing Development in the Countryside, page 16).

The authority recognises the importance of the issues raised by Stretton Climate Change as indicated in our previous response to you entitled 'Sustainability and Climate Change' (copy attached). The issues in your current submission appear to relate almost entirely to matters of policy. This perhaps explains why the submission was not presented using the consultation form which we provided for the proposed scale and distribution of development consultation. In this respect, the matters you raise have yet to be resolved through the Local Plan review process and the authority can still respond to these issues.

As you indicate with reference to our current Core Strategy, the Council does address many of these issues in a sound manner within the current, adopted Local Plan. As part of the Local Plan review, the Council may wish to simply endorse or augment the strategic objectives and policies of its current planning regime. The Council will consider these matters of policy in its final Preferred Options consultation and this is programmed for publication in Autumn 2019, in our Local Development Scheme.

When the Council responds to the broad range of policy matters you have raised, they will rely not only on the strategic objectives and policies of the new Local Plan but also on the requirements of the regulatory regimes of the Development Management, Building Control and other services administered by Shropshire Council. These services continue to address matters of public health, flood risk, infrastructure capacity, open space, the improvement of broadband connectivity and the move to the electrification of all road vehicles through the provision of charging points and other infrastructure.

The Council recognises that if we cannot satisfy all the objectives and detailed requirements in the Stretton Climate Care submission, you may present any outstanding concerns to the Planning Inspector at the Examination in Public for the new Local Plan. The Council have already programmed the Examination for March 2020, in our Local Development Scheme available at:
<https://www.shropshire.gov.uk/planning-policy/local-planning/local-development-scheme-lds/>.

Until that time, the authority wishes to continue to work with Stretton Climate Care to address those environmental matters that should be included in the emerging Local Plan.

Therefore, I have to inform you that your complaint is not upheld.

If you remain dissatisfied with this response to your complaint, you may write, giving your reasons and indicating a desired outcome, to the Complaints Monitoring Officer, Feedback and Insight Team, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND, or email customer.feedback@shropshire.gov.uk, The Complaints Monitoring Officer will look into your complaint and, if appropriate, request a review be

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conducted. This request must be made within 20 working days of receipt of this letter. Once you have received the response the Councils' Corporate Complaints Procedure is completed, if you still remain dissatisfied you may then contact the Local Government Ombudsman as per details below.

You may also contact the Ombudsman about your complaint at any stage, although they would normally expect your complaint to have been considered through all stages of the Council's complaints process before they take up your complaint. Their contact details are: Local Government and Social Care Ombudsman, PO Box 4771, COVENTRY, West Midlands, CV4 0EH, Tel: 0300 061 0614. Should you wish to make an electronic complaint please visit the LGO website and use the online form www.lgo.org.uk.

Yours sincerely
Liam Cowden
Principal Policy Officer

Appendix 7 1st September 2020



Registered Charity No. 1159816

www.strettonclimatecare.org.uk

1st September 2020

To Head of Planning Policy
Shropshire Council

The Shirehall,

Abbey Foregate

Shrewsbury

SY2 6ND

Freedom of Information Request (includes Environmental Information)

In response to our complaint submitted in 2018, a statement was issued by Shropshire Council concerning the way in which climate change would be dealt with in the Local Plan Review. That Statement is attached. In that statement reference was made to the commitment in the Preferred Options Report of October 2017 that a study would be made about wind power in the Plan area.

Paragraph 7.5 of the report states:

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“7.5 Wind Energy: National policy requires Local Authorities to clearly allocate areas suitable for wind energy development in Local Plans. Planning permission for wind energy proposals should only be granted if the application is in such an area. The Council will identify the criteria for the selection of areas suitable for wind energy development in Shropshire and carry out a Countywide assessment to inform the later stages of the Local Plan Review.”

The Draft submission Local Plan does not contain a Policy about wind energy development and there is no reference in the evidence documents for the Plan. The approach taken will prevent the development of any wind power in Shropshire even though, for example, the Shropshire Hills AONB Management Plan accepts small scale developments may be acceptable in some parts of the AONB.

The FOI request is:

- 1. For all documents and plans relating to studies of potential wind energy and landscape and other associated environmental assessment**
- 2. If no studies or assessments of wind energy were carried out, how this decision was made, what consultations were carried out and when any decisions were made, and who or what body made this decision and on what grounds**
- 3. If studies and assessments were made on wind energy, how and who made the decision to omit any assessment of wind energy from the draft local plan and when this decision was made.**

I look forward to your Response.
Yours faithfully

Michael Hymas
Secretary

Appendix 8 23rd September 2020

Good morning

I write in response to your Request for Information regarding the Shropshire Local Plan process and studies of wind energy.

The information relates to planning and land matters and has therefore been considered under the Environmental Information Regulations 2004 (EIR).

Taking your questions in turn and in the context of the Local Plan Review:

1. We do not have any documents or plans relating to studies of potential wind energy. We do however have a study on landscape, the Shropshire Landscape and Visual Sensitivity Study (LVSS). The report for this and assessments of the area around 61 settlement are available on our website at <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/evidence-base/#a-to-z-L>

We also have a range of environmental assessments as follows:

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- Green Infrastructure Strategy
- Open Space Needs Assessment
- Sequential and Exception Test – Flood Risk
- Strategic Flood Risk Assessment
- Shrewsbury Battlefield Heritage Assessment
- Shropshire Hills AONB Exceptional Circumstances Statement
- Water Cycle Study

These can all be found on the evidence base page of our website

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/evidence-base/>

Additionally, the Sustainability Appraisal and Site Assessment document is available at <https://shropshire.gov.uk/media/15538/sustainability-appraisal-environmental-report-regulation-18-pre-submission-draft-of-the-shropshire-local-plan.pdf> The settlement specific documents which include environmental assessments of sites can be found at <https://shropshire.gov.uk/get-involved/reg-18-pre-submission-draft-local-plan-consultation/>. Lastly the Habitat Regulations Assessment is at <https://shropshire.gov.uk/media/15608/habitats-regulations-assessment-report-reg-18.pdf>

2. No studies or assessments of wind energy were carried out for the Local Plan Review. Instead the Council is supporting and encouraging community energy generation schemes. These can be identified through community led plans - such as Neighbourhood Plans. Policy SP3, paragraph 2c refers. This decision was made by the Council during the preparation of the Local Plan Review on the basis that it was the most appropriate way of encouraging renewable energy developments which had the support of those communities who would be most affected, in line with footnote 49 (page 45) of the National Planning Policy Framework.

3. As above, no studies were carried out to support the Local Plan Review so there has been no decision to omit such documents from the evidence base for the Plan.

Regards

Mark Barrow
Director of Place

Appendix 9 27 September 2020

Response to Regulation 18 draft of the Shropshire Local Plan Policy SP3 on Climate Change

Although the Draft submission recognises that the UK's target for net zero emissions is now to achieve net zero emissions by 2050, the way in which this issue is dealt with is confused. The amendment to the Climate Act came into effect in June 2019 and now requires net zero emissions to be achieved by 2050 whereas the text of Paragraph 3.28 refers to a reduction by 80% and refers only to carbon emissions. It should be recognised that damaging greenhouse gases that contribute to climate change are far more than just carbon emissions. Shropshire Council declared a Climate Emergency in May 2019 and the Local Plan review does not reflect this decision and displays a significant level of complacency and misunderstanding in its approach to climate change. In particular, there is no encouragement for the generation of renewable energy by wind power, solar farms or other methods. There is no acknowledgement that achieving net zero emissions by 2050 may be too late to ensure that global temperature increase does not exceed 1.5°C and that action in relation to buildings and transport needs to occur earlier in this period rather than later. 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.

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Data on trip estimation for new housing is available on the TRICS data base. The Shropshire track record of neglect and damage to walking, cycling and public transport 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. 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.

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 this increase 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 7 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.

The draft local Plan does not give climate change the over-riding significance it deserves. It contains policies that will add to carbon emissions and it does not contain convincing evidence that the suggested policies will deliver carbon reduction.

In the preamble to Policy SP3, further confusion is created by reference to a “zero carbon economy”. This is not possible. Many gases cannot be entirely eliminated, in particular methane, which is a far more potent greenhouse gas. In addition, the Policy requires only reductions in “carbon emissions”, when there is a need to reduce greenhouse gas emissions including carbon emissions. It is possible to refer to greenhouse gas emissions in terms of their equivalence to carbon dioxide, but the draft does not do this. We must object strongly to this Policy on these grounds.

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.

To provide for the development of wind power in the Shropshire Local Plan could only be achieved by a resubmission of this part of the Shropshire Local Plan after necessary studies and consultations are carried out.

Stretton Climate Care does not wish to delay adoption of the Local Plan if an urgent partial review of the Local Plan would be carried out to address the issue of wind power with adequate studies and consultation. We would need assurances that Shropshire Council would pursue this matter without delay and without a prior determination to prevent all or most wind power developments.

(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 respond to any issues or questions that might arise in relation to our representation.

(Please continue on a separate sheet if necessary)

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

Signature: [

[

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference: