



## **Response to Preferred Sites Consultation**

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We have found the questionnaire provided to be unsuitable for our responses to the consultation as:

- Answers are not always as simple as Yes, No, Don't know,
- Our area of interest covers the whole county but not necessarily down to specific site detail for the majority of sites
- The need for explanatory comments would require a confusing number of additional sheets

We have however attempted to follow the format and order of the questionnaire as closely as possible and have been assured that this will be acceptable.

## **Delivering Local Housing Needs**

We, and the majority of others, have expressed concerns relating to the high level of growth in previous consultations. 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)".

The high level of growth coupled with weak or out of date policies relating to social and environmental factors is a major concern. 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.

## **Cross subsidy Exception Sites**

These would appear to be an acceptable way of delivering affordable housing as long as they conform to wider local plan policies and the site suitability and sustainability criteria are adequate. Given variations across the county the development would probably be best assessed on a site by site basis but subject to countywide thresholds/limits.

The NPPF suggests that Local Planning Authorities are responsive to "local circumstances" and support "local needs". Not quite the definition given in 2.1 of the consultation document. We would suggest that in most cases what is being driven forward is actually contrary to most community's view of what their circumstances and needs are.

We also note that while the need to provide more affordable and low-cost market housing is a key planning issues for a large number of areas, it is virtually absent from the site guidelines. Surely those most in need of an affordable housing provision would also be those who would most benefit from their properties being in sustainable, well planned locations with adequate local infrastructure.

## **Windfall Development**

While windfall allowances are appropriate for some settlements the levels suggested are worrying high in some cases accounting for some 75% of the target figures. Windfall can allow for appropriate development as suitable sites come forward over the plan period but with an overly high reliance on windfall and existing policies which have failed to prevent biodiversity loss there are concerns over the potential impacts.

## **Albrighton Place Plan Area**

Although it may be covered in the coming Strategic Sites consultation it is surprising that no mention has been made of the 'Garden Village' proposals.

We have concerns over the proposed "step change" in housing delivery needed but would agree with the development boundary.

We do not agree with the considerable loss of Green Belt area. Site P32a seems sensible and P35 has some logic to it, however the release of P36 "would lead to a High level of harm to the Green Belt in this local area". Creating sub parcels that can be assessed as having lower levels of harm completely undermines the role of the Green Belt in

- safeguarding of the countryside from encroachment
- preserving the setting and special character of historic towns

## **Bishop's Castle Place Plan Area Bucknell**

The selection of sites in Bucknell needs careful consideration – sustainability appraisal scores are generally poor and those considered to have least impact are not being put forward for allocation. Presumably they have not been promoted? At least BKL008a is set back somewhat from the River Redlake (a watercourse that flows directly into the River Clun SAC.) The need to provide a very significant buffer to the River Redlake, made up of natural green space, needs to be kept in mind when considering potential areas for development. This links to our concerns regarding the need for an updated Environmental Network layer and stronger policies to meet the requirements of the revised NPPF. How for example are measurable net gains for biodiversity going to be achieved from developments in the Bucknell, or any other, area?

## **Bridgnorth Place Plan Area**

Again the guidelines reflect the overly high levels that are being suggested for the county.

The encroachment into, and development of, the Green Belt in and around Stanmore Country Park and the extension of the development boundary is of great concern.

We cannot agree with the mixed use allocation P54 (part); P56 (part); P58a; STC002; STC004 (part); STC005; and STC006 or the safeguarded land.

- The Green Belt release sites will result in either High, Moderate-High or Moderate levels of harm
- There is a lack of regard of the impact of the Ancient Woodland and its setting, (contrary to NPPF, Lawton Review, A Green Future: Our 25 Year Plan to Improve the Environment
- It is not clear what the "exceptional circumstances" are beyond achieving an unsustainable level of growth.
- If there are truly exceptional circumstances then there should be far greater detail of the "improvements to the 'environmental quality and accessibility' of remaining Green Belt". This should include a significant buffer area to ancient woodland.
- Contrary to the aims of sustainable development these sites in the Green Belt would be likely to produce communities that would be heavily reliant on car travel. See our comments regarding issues with the Sustainability Appraisals.

- The country park has been managed for over 20 years, with input from the local community and provides a site much valued by the people of Bridgnorth for its wildlife interest.

### **Broseley Place Plan Area**

We agree with the development boundary for Broseley but would point out that it should extend no further west than its current limit at Speed's Lane. West of this lane is Penn's Meadow Local Wildlife Site.

### **Church Stretton**

We do not agree with the development boundary and the inclusion of site CST020.

- CST020 scores very badly in the Sustainability Appraisal
- Is in close proximity of both a Local Wildlife Site and Ancient Woodland. The unallocated part of the promoted site is completely insufficient as an ecological or landscape buffer.
- Encroaches onto visible high ground and will negatively affect the ecological network / wildlife corridor and so would be contrary to NPPF para 174.

### **Ellesmere**

"Opportunities for securing measurable net gains for biodiversity" (NPPF para 174) should be pursued. The de-culverting of the Newnes Brook should be a required element of any masterplan.

### **Market Drayton**

We would broadly support the Local Plan reflecting the Market Drayton Neighbourhood Plan and would agree with the suggested guidelines and development boundary. We would however wish to oppose any expansion of the development boundary or allocation of sites in the area between the existing built area and the River Tern or in the area west of the town in the Fordhall area.

### **Cressage**

Site CES005 has the potential to strengthen the buffer to the Local Wildlife Site and stream valley to the west. Again "opportunities for securing measurable net gains for biodiversity" (NPPF para 174) should be pursued.

### **Oswestry**

We would agree with the development boundary and are pleased that it does not facilitate any further encroachment into the Morda Valley or towards the Hill Fort.

### **Knockin**

Site KCK009 needs to provide an adequate buffer to the Weir Brook

### **Shifnal**

It is hard to agree with the level of growth proposed for Shifnal or the release of large areas of land resulting in a High level of harm to the Green Belt designation in this local area.

The extent of Green Belt loss is especially surprising as in both the Shropshire local plan Core Strategy and the Shifnal Neighbourhood Plan (both running till 2026) there are clear statements that the existing Green Belt boundaries should be retained.

It is also disappointing that there appears to be no recognition of the Wesley Brook corridor in either the Local Plan Review document or the Green Belt Review.

### **Shrewsbury Place Plan Area Shrewsbury**

Shropshire Wildlife Trust does not agree with the preferred housing and employment guidelines for Shrewsbury.

Shropshire Wildlife Trust does not agree with the proposed development boundary for Shrewsbury. We do however welcome the fact that the boundary has not been extended west of the Ellesmere Road or westwards toward Mousecroft Lane.

Sites SHR158/SHR060/SHR161 and SHR057(part)/SHR177 should be subject to careful master planning to ensure that the numerous ecological features of interest are not only fully protected but that “opportunities for securing measurable net gains for biodiversity” (NPPF para 174) are delivered and that the ambitions of the Big Town Plan to improve the town’s green network are realised.

Site SHR216 should not be allocated as to do so would be contrary to both local and national planning policy and national environmental strategy. It would also make a mockery of the Sustainability Appraisal which finds this to be the least sustainable site in the town. It can be argued that the SA score should be even lower as the site falls within grade 3 agricultural land on the west midlands map. Of particular concern is the fact that the site includes part of the Shelton Rough Local Wildlife Site. We note that the Site Guidelines stipulate that development should be “comprehensively planned, and should be the subject of a masterplan” but there is already a masterplan that shows development encroaching onto the LWS.

Site SHR166 raises a number of concerns and it is unclear how it can be accessed sustainably. While we accept that the majority of the site does not fall within Flood Zones 2 and/or 3 there is concern relating to the possibility of material, waste and spillages entering the River Severn both during construction and subsequent operational phases.

### **Bayston Hill**

We do not agree with the development boundary being extended to include site BAY039. The development of site BAY039 would be an encroachment into the open countryside and result in a reduction of the buffer between Lyth Hill Country Park (Local Wildlife Site) and Bayston Hill village. The additional traffic generated is likely to deter non-car based journeys to the Country Park.

### **Cross Houses**

The old railway line has the potential to provide an interesting ecological corridor that could also provide a sustainable transport route. Any development should not compromise the future access through the site.

### **Whitchurch**

We cannot agree with the allocation of site WHT042 and its inclusion within the development boundary. A portion of the Stagg’s Brook Local Wildlife Site falls within this site and this is picked up in the Sustainability Appraisal but is not mentioned in the Site Guidelines. A significant buffer zone will be required to protect and enhance the existing LWS and ensure that priority species are protected and their recovery promoted.

## **Further Comments**

Our additional comments relate to the processes and policy considerations that should effect the selection of the preferred allocated sites.

## **Local Green Space**

The NPPF states that communities should have the opportunity to designate Local Green Space through both **local** and neighbourhood plans. The current Shropshire approach to only consider this in Neighbourhood Planning removes this opportunity from the vast majority of Shropshire and in particular from Shrewsbury itself which is likely to see the greatest level of growth and where the value of the green network (including the sites within it) has been recognised within, and is seen as an important component of, the Big Town Plan.

As the NPPF states that “Local Green Spaces should only be designated when a plan is prepared or updated” we would like to see subsequent consultations include a request for sites that communities feel might meet the criteria.

## **Sustainability Appraisals**

The Sustainability Appraisals appear to have a number of failings. Not all the initial objectives appear to be translated into the criteria used for assessment and even then one of the criteria relating to public transport does not appear to have been applied. Surely the omission of:

- Encouraging the use of sustainable means of transport
- Reducing the need of people to travel by car
- Reducing carbon dioxide emissions

is a major flaw.

Given the role green space and infrastructure can play in providing sustainable transport networks, carbon capture, etc. this also has an impact on how proposed developments may impact or enhance ecological networks.

We also note that some preferred sites were apparently promoted after the SAs were completed and have still been included with a caveat that a SA will be undertaken at a later date. This does not allow for a fair assessment of the sites by those wishing to respond to the current consultation.

## **Mapping of Environmental Assets**

The revised NPPF (para 174) requires that plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

We do not feel that the Environmental Network map in the current Local Plan is adequate and there appears to be no process for measuring the net gains for biodiversity at a meaningful level.

There is also no evidence that the existing Environmental Network map has informed the selection of sites as ‘core areas’, ‘buffers’ and ‘corridors’ are all included with often no reference to them in the site guidelines.

## **Master planning**

We would like further clarity on how master planning of a number of the allocated sites is envisaged. Given the apparent limitations of the sustainability assessments and use of environmental mapping our concern is that the sites once allocated will not be adequately guided by master plans. They will have gathered a certain momentum and expectation for delivery of housing numbers.

Our experience from the current and previous plans has been that many ecological elements are reduced or omitted altogether as developments progress through the system.

## **Level of public participation**

It is very evident that only a very small proportion of the population are aware of the consultation and many of those that are find the process very hard to participate in. We appreciate that it is hard to engage people in these consultations and to adequately explain the process but more needs to be done if the results are expected to truly reflect public opinion.

Failure to address this will result in further lack of confidence in the planning system.

## **Policies**

To pre-empt future consultations we would like to see stronger policies relating to habitats and biodiversity, in particular how the new requirement for “securing measurable net gains for biodiversity” will be achieved.

Other policy areas that need consideration are:

- Green/brown roofs (as per Cambridgeshire)
- Climate Change adaptation and mitigation
- Improvements to ensure delivery and avoid enforcement.