

**Shropshire Council**

**Local Plan Review 2016 – 2036**

**Sustainability Appraisal  
Scoping Report Consultation Draft**

**Summary of Representations**

January 2017

## Local Plan Review: Sustainability Appraisal Scoping Report Consultation Draft Summary of Representations

### Introduction

Shropshire Council asked for representations on the Sustainability Appraisal Scoping Report Consultation Draft between 19th October 2016 and 24th November 2016. The document was sent by email to Historic England, Natural England and the Environment Agency, environmental organisations in Shropshire and neighbouring Local Authorities. Town and Parish Councils were notified through the Shropshire Association of Local Councils (SALC). The Consultation Draft was also available on Shropshire Council's website and responses were welcomed from members of the public and other interested parties.

Comments were received from Historic England, Natural England and the Environment Agency and five other organisations. The table below shows the name of the respondent, summarises their comments and sets out Shropshire Council's response. Text in bold shows where changes have been made to the Sustainability Appraisal Scoping Report Consultation Draft. The amended document now forms the Sustainability Appraisal Scoping Report and is available on Shropshire Council's website.

The methodology set out in the Sustainability Appraisal Scoping Report will be used for the Sustainability Appraisal of all Shropshire Council Local Plan Review documents.

Respondent	Response	Proposed Action / Response
Church Stretton Town Council	<ol style="list-style-type: none"> <li>1. Suggest addition of several documents to list of Plans and Programmes</li> <li>2. Section 2.5(g) water should include 'aim to improve flood defences'</li> <li>3. Amend AONBs to AONB</li> <li>4. Table 5.5 should be amended to include undesignated sites as these also contain habitats and species such as great crested newts</li> <li>5. Table 5.5: SO4, SO5 and SO6 do not include GP surgeries, secondary schools or post offices.</li> <li>6. Table 5.5 SO14 should include brownfield sites</li> <li>7. Table 5.5: SO15:</li> </ol>	<ol style="list-style-type: none"> <li>1. No change: Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires SA to set out the relationship with '<i>other relevant plans and programmes</i>' and to include '<i>information on the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during the LPR's preparation</i>'. The Council does not consider the documents suggested constitute directly relevant plans, programmes or objectives in this context.</li> <li>2. No change: 'Reduce flood risk' covers this</li> <li>3. No change: Act covers all AONBs in England</li> <li>4. No change: Wildlife Sites are undesignated sites</li> <li>5. <b>Change accepted:</b> include relevant services and facilities from Shropshire Council Hierarchy of Settlements Methodology</li> <li>6. <b>Change accepted:</b> amend criteria to include brownfield sites</li> <li>7. Table 5.5:</li> </ol>

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	<ul style="list-style-type: none"> <li>a) Heritage asset and its setting should be inserted into criteria and given a positive score</li> <li>b) Listed buildings should have a 300m buffer zone</li> </ul> <ul style="list-style-type: none"> <li>8. Table 5.2. Designated or non-designated heritage features should be replaced by designated and non-designated heritage features</li> <li>9. Table 5.2. SO16 supplementary questions should mention views in respect of the AONB</li> <li>10. Table 5.2. SO16, the score for landscape sensitivity should be strongly negative</li> </ul>	<ul style="list-style-type: none"> <li>a) See response to Historic England</li> <li>b) <b>Change accepted:</b> include Listed Buildings with a 100m buffer zone on advice of Shropshire Council Historic Environment team. See also point 13 of response to Historic England.</li> </ul> <ul style="list-style-type: none"> <li>8. <b>Change accepted:</b> amendment accepted, see also point 4 of response to Historic England.</li> <li>9. No change: 'Avoid harm to the special qualities of the Shropshire Hills AONB' includes avoiding harm to views of AONB</li> <li>10. No change. Strongly negative score applies to recognised internationally or nationally protected environmental assets in line with Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004.</li> </ul>
Environment Agency	<ul style="list-style-type: none"> <li>1. The climate change adaptation section should be amended to include EA guidance on considering climate change in planning.</li> <li>2. Suggest SA looks at options for strategic flood risk management and reduction e.g. flood storage improvements.</li> <li>3. Source Protection Zones are an important consideration for the protection of groundwater.</li> <li>4. Recommend that options are considered to help deliver the objectives to improve the water environment set out in the Severn River Basin District: River Basin Management Plan 2015.</li> <li>5. The Water Framework Directive requires the planning system to address the issues that prevent watercourses from</li> </ul>	<ul style="list-style-type: none"> <li>1. No change: Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires SA to set out the relationship with '<i>other relevant plans and programmes</i>' and to include information on <i>the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during the LPR's preparation.</i> The Council does not consider EA guidance constitutes a directly relevant plan, programme or objective in this context.</li> <li>2. <b>Change accepted:</b> Amend SO10 to include 'improvement to flood management'. Include supplementary question to cover provision of flood storage measures.</li> <li>3. <b>Change accepted:</b> Include Source Protection Zones in site assessment criteria</li> <li>4. and 5 <b>Change accepted:</b> SO9 aims to conserve and enhance water quality but additional supplementary questions and indicators could link to Water Framework Directive objectives.</li> </ul>

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	achieving Good Ecological Status or Good Ecological Potential	
Gladmans Developments Ltd	<ol style="list-style-type: none"> <li>1. Shropshire Council should ensure that the policy choices in the LPR are clearly justified by the results of the SA process. It should be clear from the SA why some policies options have been progressed and others rejected.</li> <li>2. The logical staged approach to developing the SA framework is appropriate and the different criteria for site assessment are supported.</li> <li>3. The age structure of Shropshire's population makes it important to provide significant levels of new housing in the LPR and SO3 should be monitored to make sure sufficient homes are being provided for all sections of the community.</li> <li>4. The SA should balance the requirement to significantly boost housing supply with key constraints and alternative options explored only where harm of development significantly and demonstrably outweigh the benefits.</li> <li>5. SO12: the LPR should only include new technical standards for design where these address clearly evidenced need and where their viability has been considered</li> <li>6. SO16: Any policies for the protection and enhancement of the environment should be established in light of national policy,</li> </ol>	<ol style="list-style-type: none"> <li>1. Comment noted</li> <li>2. Support welcomed</li> <li>3. Comment noted.</li> <li>4. Comment noted. This is matter for the LPR</li> <li>5. Comment noted. This is a matter for the LPR</li> <li>6. Comment noted. This is a matter for the LPR.</li> </ol>

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	<p>particularly paras 109-125 of NPPF. Criteria based policies should be set against which proposals for development affecting landscape areas will be judged.</p>	
<p>Historic England</p>	<ol style="list-style-type: none"> <li>1. Chapter 2. The plans and programmes information for the historic environment is limited and does not offer scope for a fully informed assessment. Recommend NPPG and several other Historic England Guidance documents are included.</li> <li>2. Chapter 2. Concern that no regional or local information is included for example Conservation Area appraisals.</li> <li>3. Chapter 2. The summary of the key issues section should be revised to read 'Conserve and enhance designated and non-designated heritage assets and their setting'.</li> <li>4. Chapter 3. All references to undesignated heritage assets should be amended to 'non-designated heritage assets' in line with NPPF terminology</li> <li>5. The baseline information is very limited and does not identify meaningful trends for Shropshire. For example, what baseline information is available for Conservation Areas and how has the Heritage Counts data been used to inform the process?</li> <li>6. The data does not provide for any unknown archaeological elements which may become apparent through site</li> </ol>	<ol style="list-style-type: none"> <li>1. No change: All relevant and current international/European and national plans and programmes listed in the HE guidance on SEA and SA are included in Appendix A.</li> <li>2. No change: Regional information is included in Appendix A. The types of local information suggested characterise specific geographic designations within Shropshire and whilst integral to the site assessment process (which includes SA, see also point 6 below) are not appropriate at the more strategic LPR level. Page 7 of the HE guidance on SEA and SA also says that '<i>point data alone from individual designations does not provide an adequate overview</i>'</li> <li>3. <b>Change accepted:</b> Amend Key Issues</li> <li>4. <b>Change accepted:</b> Amend whole of SA Scoping document accordingly</li> <li>5. No change: For Conservation Areas, see point 2 above. Data provided in Table B9 is consistent with the LA data available in Heritage Counts at <a href="https://historicengland.org.uk/research/heritage-counts/indicator-data/local-authority-profiles/">https://historicengland.org.uk/research/heritage-counts/indicator-data/local-authority-profiles/</a></li> <li>6. <b>Change accepted:</b> Amend Chapter 5 to include information on the site assessment process used to select sites for allocation through LPR. SA is one element of this but the wider process includes expert advice from Shropshire Council Historic Environment team which covers unknown archaeological elements.</li> <li>7. <b>Change accepted:</b> Amend SO15 to include setting</li> <li>8. <b>Change accepted:</b> Include relevant additional supplementary questions from Appendix 3 of the HE guidance on SEA and SA</li> <li>9. <b>Change accepted:</b> Amend Table 5.3 to show compatibility between objectives 2, 3 and 15.</li> <li>10. No change. Policies are against each SO by asking what type of effect that policy is likely to have on each SO. The supplementary questions</li> </ol>

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	<p>allocation work. NPPF requires these to be taken into account.</p> <p>7. Chapter 5, Table 5.2: recommend that setting be included in SO15.</p> <p>8. Table 5.2 SO15 supplementary questions. These are not sufficient to inform the SA and LPR and should be widened in line with HE guidance on SEA and SA.</p> <p>9. Table 5.3: Objectives 2, 3 and 15 are potentially compatible as the historic environment can act as a catalyst for the local economy through high quality design.</p> <p>10. Table 5.4 suggest criteria be revised to clearly set out whether the policy supports the SO taking into account the significance of effect levels set out in the table e.g. + positive could read ' policy or option supports the achievement of this objective although it might only have a minor beneficial effect'</p> <p>11. Table 5.5: Criteria 13 does not take into account setting.</p> <p>12. Table 5.5: It is not clear how the distance in this criteria has been reached.</p> <p>13. Table 5.5: Listed Buildings are not included nor are non-designated heritage assets.</p>	<p>in Table 5.2 designed to help reach a conclusion on the type of effect (i.e. negative or positive). Table 5.2 assists in deciding the significance of that effect in line with Annex II of the SEA Directive and Schedule 1 of the 2004 Environmental Assessment of Plans and Programmes Regulations.</p> <p>11. No change: Criteria 14 includes an allowance for setting. See also point 6 above with reference to wider process for site assessment in LPR.</p> <p>12. <b>Change accepted:</b> Amend table to indicate that distance was determined by Shropshire Council Historic Environment Team</p> <p>13. <b>Change accepted:</b> Include additional criteria to cover Listed Buildings. No change for non-designated assets as they will be included as part of the wider process for site assessment (see point 6 above).</p>
Natural England	Broadly supportive. Agree with inclusion of protected sites, species and landscapes.	Support welcomed

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<p>People's Alliance for Ludlow</p>	<ol style="list-style-type: none"> <li>1. There should be an emphasis on planning that leads to retaining medium and long term economic benefits not just 'immediate fixes' and the one-off benefit of local employment.</li> <li>2. The proposed Parliamentary boundary changes will create a Ludlow constituency with no major urban areas. The planning appraisal process should therefore have an emphasis on the sorts of small economic enterprises found in such areas.</li> <li>3. Table 2.2: Suggest addition of 3 documents and a line in 'Summary of issues' to read 'Ensure that economic benefits are retained and used locally wherever possible'. Update Appendix A accordingly.</li> <li>4. Table 3.3: Include ambulance travel times in table and in issues text to recognise that travel times in the south of the county present a clinically significant risk to patients.</li> <li>5. Table 4.2: add text in baseline information to reflect changes to Parliamentary constituency boundaries as in point 1 above and adjust tables in Chapter 4 accordingly.</li> <li>6. Table 5.2 SO2 Supplementary questions. Include "retain economic benefit in the local area, not export it to other parts of the UK (or world)" and "recognise the lack</li> </ol>	<ol style="list-style-type: none"> <li>1. Comment noted. Planning for the structure of the economy is a matter for the LPR</li> <li>2. Comment noted. Planning for the structure of the economy is a matter for the LPR</li> <li>3. No change. Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires SA to set out the relationship with '<i>other relevant plans and programmes</i>' and to include information on <i>the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during the LPR's preparation</i>. The Council does not consider the documents listed constitute directly relevant plans, programmes or objectives in this context. The insertion of extra text to reflect proposed changes in remainder of document is therefore not needed</li> <li>4. No change. The Ambulance Quality Indicators data at <a href="https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/ambulance-quality-indicators-data-2016-17/">https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/ambulance-quality-indicators-data-2016-17/</a> does not contain a breakdown of figures for parts of Shropshire. This means it is not possible to provide information on differential travel times for ambulances or include this as an issue.</li> <li>5. No change. Planning for the structure of the economy is matter for the LPR</li> <li>6. No change: Supplementary question 'Retain employment in Shropshire' covers this issue</li> <li>7. No change. SO2 is not included in the site assessment criteria because all sites proposed for allocation are likely to meet its objectives. This would produce similar scores each site and would not be helpful in assessing their relative sustainability. The associated criteria and scores are thus not needed.</li> </ol>

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	<p>of major urban and industrial zones in Shropshire”</p> <p>7. Table 5.5: Include SO2 in the site assessment process. Suggest associated criteria and scoring to support this.</p>	
Sustainable Transport for Shropshire	<p>1. Chapter 2: Suggest addition of several other guidance documents to the Plans and Programmes section including NPPF and Core Strategy.</p> <p>2. Chapter 3: The baseline information should reflect a good balance of data. Where information is not available this should be noted with proposals to fill the gap.</p> <p>3. Chapter 3: Economy. This section is distorted in favour of employment. It should include other assets such as the countryside and the fixed capital in the public and private sectors which contribute to the economy</p> <p>4. Chapter 3: Population. Suggest including a section noting that half of the people in the county do not work.</p> <p>5. Chapter 3: Transport and accessibility. This neglects major sections of the population in that it does not refer to travel to school, leisure, for family reasons and for tourism. It should also refer to other forms of transport such as walking, cycling, buses and disability vehicles. The issues should make reference to non-working people and safe travel to school.</p>	<p>1. No change. NPPF is included in the list of Plans and Programmes and the Shropshire Core Strategy forms part of the LPR itself. Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires SA to set out the relationship with ‘<i>other relevant plans and programmes</i>’ and to include information on <i>the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during the LPR’s preparation</i>. Shropshire Council does not consider the other documents listed constitute directly relevant plans, programmes or objectives in this context.</p> <p>2. No change. The Council considers that the existing baseline data adequately reflects the purpose of SA</p> <p>3. No change. The contribution made by natural and historic assets is reflected in the sections dealing with biodiversity, fauna, flora, air, water, historic environment and landscape.</p> <p>4. No change. The Council considers that the existing baseline data adequately reflects the purpose of SA</p> <p>5. <b>Change accepted.</b> Include data on reasons for travel and mode of travel in Table B2. Note; this information is only currently available for England but will provide a useful baseline for future reference.</p> <p>6. No change. Appendix B gives the detailed baseline data and issues related to each dataset. These are then summarised in Chapter 4</p> <p>7. No change. SO6 is derived from Table 4.2 which summarises the issues identified in the review of plans, programmes and policies and the baseline information (Appendices A and B).</p>



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	<p>6. Chapter 4 should show baseline datasets for each issue and the metrics shown are unrelated to the issue</p> <p>7. Table 5.1: SO6, 'reduce the need of people to travel' appears out of the ether – it is not previously mentioned in the document</p> <p>8. Chapter 5: SO6 should be amended to 'reduce the need to travel by car' and a second SO be included 'encourage the use of human powered travel e.g. by cycling and walking.</p> <p>9. Table 5.2: SO4 does not mention proximity to a bus stop with a service on 5 or more days a week.</p> <p>10. Table 5.2: SO5 should include a line about increasing safe cycling and walking by the provision of dedicated paths where possible</p> <p>11. Table 5.2: Indicator for SO5 and SO7 should include percentage of people walking or cycling to school, college, shops, for leisure or to access leisure facilities</p> <p>12. Table 5.5 SO4 should be amended to make reference to 4 return trips per day.</p> <p>13. Table 5.5 Criteria 5 and 6 should be expanded to include the developer's provision for access to site by cycling or walking and opportunities to provide contiguous cycling and walking routes?</p> <p>14. Appendix A should include the Shropshire Council all party decision through</p>	<p>8. <b>Change accepted:</b> Amend SO6 as suggested but do not include additional SO as the suggested issue is implicit in SO6.</p> <p>9. No change. Table 5.2 sets out the supplementary questions for the SA of policies whereas the proximity of a bus stop is a criterion for the SA of site allocations. As such it would be impractical to assess policy options on this basis.</p> <p>10. No change. Issue covered by existing supplementary question 'Enable more walking or cycling'</p> <p>11. No change: This data is not currently available at a Local Authority level.</p> <p>12. <b>Change accepted:</b> Amend criteria to make reference to a bus or train service suitable for commuting in line with Shropshire Council Hierarchy of Settlements Methodology</p> <p>13. No change. This level of detail is not consistently available at the site allocation stage – it is usually only provided when a planning application is submitted.</p> <p>14. No change. As in point 1 above, the Council does not consider this document constitutes a relevant plan, programme or objective.</p>

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	<p>Shrewsbury Vision to reduce through traffic in the County Town.</p>	
<p>Worthen with Shelve Parish Council</p>	<ol style="list-style-type: none"> <li>1. The Parish has a high proportion of self-employed residents and no high employment centres. Access to services and leisure facilities (most of which are diminishing due to funding cuts) is vehicular but the bus network is diminishing.</li> <li>2. The type of housing currently planned for the Parish does not deliver the housing needed in the area.</li> <li>3. The PC believes that there will not be enough younger residents (due to the lack of affordable housing) to provide the services that may be required to sustain the community.</li> <li>4. The Parish is partly within the Shropshire Hills AONB and there are numerous environmental designations in the area. Protecting these assets is paramount when considering planning applications.</li> <li>5. The PC is concerned that Shropshire lost more undeveloped land to residential use than in the W Midlands and England between 2013 and 2015. If this trend continues through the current Local Plan period this would mean 16,755 new homes in previously undeveloped areas.</li> <li>6. It is important that resident's views on the capacity of existing infrastructure to accommodate development are listened to.</li> </ol>	<ol style="list-style-type: none"> <li>1. Comments noted</li> <li>2. Comments noted.</li> <li>3. Comments noted</li> <li>4. Comments noted</li> <li>5. Comments noted</li> <li>6. Comments noted</li> <li>7. Comments noted</li> </ol>

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	7. The PC asks that the cumulative effect of planning applications is taken into account. The demographics and ethos of the parish is being changed dramatically by decisions which have little regard to the Parish Plan or the PC's views.	