

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A 0655
Matter	3 Development strategy
Relevant questions nos	2, 4, 9, 10, 11, 12, 17, 21.
SHREWSBURY CIVIC SOCIETY TRUST Ltd	

Matter 3: Development Strategy (policies SP1-SP15)

Q2. SP1 is necessary and does not replicate others but it has no specific assessment criteria, relying on those of other Policies. This omission will render it unenforceable and so reduce the LPA's ability to improve quality. If this is a "Gateway" Policy, the "gate's" limits should be specified or, at least exemplified, to enable planners to promote its intentions. The LPA has several examples of similarly failed policy intentions. (See Annex 1) Research from Civic Voice shows that a high number of draft Local Plans expound high ideals but contain few ways to achieve them.

Q4. SP2 Should play a big part in the scale of development in broad terms. For Shrewsbury, housing growth is too fast and without a Neighbourhood Plan this cannot be shown. Councillors on the deciding Cabinet largely represent rural wards. There is insufficient extrapolation of data concerning the aging population, the unsustainable birth rate and the long term local housing need.

Q9. In Policy SP3 most measures are thought to be seeking to mitigate rather than reduce emissions. There is nothing about seeking to reduce road building or demolitions or limiting emissions by the farming industry. The policy is entirely insufficient. Furthermore, current estate developments will increase emissions in the short (construction/density) and long term for several reasons, for example, the way they encourage car use, insufficient reduction of energy use.

Q10. SP4 is probably not necessary, although many planning applications suggest that energy reduction is the only form of sustainability. NPPF needs re-stating.

Q11. SP5 is very important as a strategy for a County whose attractions and economy rely on the quality of the environment. We support this strategy but it must be enforceable. Current measures have been completely inadequate leading to many large estates with no sense of 'conspicuous identity'.

Q12. The WMDC is worthy in principle and its adoption shows some unity with other West Midlands areas. It is open to interpretation and needs exemplification. However, in line

with national moves towards Design Coding it will provide, with the “Shropshire Test”, necessary over-arching principles. (Shrewsbury is now a Design Coding Pathfinder.)

Q17. We are very concerned that SP12 discloses weaknesses in the Authority’s valuation of Shropshire’s built environments. The market towns and especially Shrewsbury, form significant attractions for tourism, investment and the economy. The Civic Society’s Built Environment Report clearly identifies what’s missing. (see Annex 2.)

Q21. Windfall development had been quantified in early Local Plan drafts. We think it should have a greater priority because of the strategic planning by the Big Town Plan with a policy of “Balanced Growth”. With more Neighbourhood planning and other influences such as more BIDs and PDR extensions “Windfall” homes are increasingly likely.

We also hope the comments we made at Reg 19 will be considered, including those about DP24 (which now appears to be DP23.) An expert member of our Civic Society points out the “unrivalled prevalence” of Shrewsbury’s timber framed buildings (many of which are hidden by later brick facades) providing the rare authenticity that draws Shrewsbury’s many admirers and investors. There are too few specific policies to prevent the erosion of these high-quality assets, designated or otherwise, in SP16 or for the whole county.

Annex 1

Evidence of previous policies that have been insufficient to promote high quality: Many, including most of the Council’s Cabinet, think that several of the fringe volume building estates lack distinction and long-term sustainability (in all its meanings). C/f Minutes of informal meeting with Cabinet (SCS 28.03.22) There have been at least three large housing applications that have stated compliance eg with WMDC, BfL12, etc but resulted in plans of weak quality, lacking any distinction and unlikely to meet local needs or be adaptable.

Annex 2 The Built Environment Report (attached)