

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0629
Matter	8
Relevant questions nos	2, 3, 4, 16 (best fit),

1. INTRODUCTION

This submission is concerned with infrastructure and the planning strategy that accompanies it.

The main relevant document is:

[Infrastructure - A Strategic Infrastructure Implementation Plan - EV067.pdf](#)

We consider that the supply of **renewable energy** is part of infrastructure and thus should be addressed by the Local Plan. It is identified as such at p.2 *ibid*

We also consider that **public transport** is a part of infrastructure and thus should be addressed by the Local Plan. It is identified as such at p.2 *ibid*

We also note that EV067 carries the strap-line: "Innovate to thrive" on its title page.

We agree with the sentiment, but can find no evidence of innovation as applied to the questions considered below.

In summary, we consider EV067 is UNSOUND for the reasons given below and that, therefore, any strategy that follow from its contents cannot be relied upon.

Q2. What are the likely impacts of the proposed scale and distribution of development on the various aspects of infrastructure? How have these been assessed?

a) energy

Firstly, we can find no evidence in EV067 of the assessment of access to energy supply (from any source) by Shropshire Council and its consequent use as a factor in the assessment of new domestic or employment building allocations.

Secondly, we can find no consideration of how alternative arrangements could be made for energy supply as a part of the strategy set out in the NPPF, for instance:

155 c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for colocating potential heat customers and suppliers.

and

156. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

b) Public transport

We can find no evidence that access to public transport infrastructure has been used as part of any land allocation or settlement planning process. Indeed, the ‘strategic growth corridors’ set out at 3.28 of the draft Local Plan refer only to road (car/HGV) and rail transport. Public transport, essential for fair and non-discriminatory access to employment on these corridors, is not considered a strategic factor.

We note that the NPPF (para. 85) sets out:

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).”

We can see no evidence that this approach to spatial planning has been applied to the development of this policy.

c) Currency

It is also worth noting that the Local Transport Plan documents provided by Shropshire Council (EV0070.xx) were created in 2011. EV070.02 is titled:

*Shropshire Local Transport Plan
Provisional LTP Strategy - Summary
2011- 2026
[Written] June 2011*

It is thus:

- Already ten years old
- Described as ‘provisional’
- Applies only to a date in the near future.

It seems unwise to use any such documents as a basis for any SA plan out to 2038, especially when it is known that a revision to the Local Transport Plan is in progress; public consultation sessions conducted by City Science on Local Cycling & Walking Infrastructure Plans (LCWIP)s having only concluded in the last two or three months.

Q3. Are the infrastructure requirements clearly set out in a policy/policies in the Local Plan? If not, should they be?

a) Energy

i) The full infrastructure requirements are not set out at all.

For instance, EV067 at page 9. states:

“There are a number of large scale power supply infrastructure projects identified within this Strategic Infrastructure and Investment Plan,”

but the list presented and the section on ‘Renewables’ (p. 19 et seq) are merely a copy of ‘business as usual capacity increases (“reinforcement”) **already planned** by Western Power Distribution (with the exception of one project to place a cable under a road and one industrial development where the cost of connection to the grid will be borne by the developer).

This needs to be fully understood. The WPD plans are, in major part, the result of historic growth and capacity issues. They cannot be a strategic response to the developments proposed in the draft Local Plan, because the WPD investment case for the next five years (under the RIO- ED2 national consultation programme) has not yet been approved by Ofcom. This list gives a false impression of proper consultation between WPD and SC when this is not the case; no evidence of real consultation has been provided.

ii) EV067 provides some text on ‘renewable energy’. The discussion on p. 9 regarding renewables is not a strategy for introduction of renewables, it simply states that renewable energy is a ‘want’. It also confuses Shropshire Council’s own internal actions to reduce its carbon emissions with a general strategy for the county – clearly the two are not comparable and require different agency for execution.

b) Public transport

With the exception of items 13I (potential park and ride provision within Taseley development and 13AJ (Shifnal local bus service), public transport a strategic element of infrastructure is not addressed in any relevant manner. This is a clear deficiency in the strategy.

Q4. Shropshire's Strategic Infrastructure and Investment Plan 2022 includes a number projects that have funding gaps. Are these likely to affect the delivery of the Plan, including the saved sites), and if so how?

a) Energy

The funding of the energy projects is all provided by WPD/SP except one developer and one joint (cable under road) . There is no evidence that Shropshire Council have considered any other funding in this area.

b) public transport.

Except as noted under Q3. B) above, there is no funding identified for public transport in Shropshire. It could be argued that Shropshire Council made application to the 'Bus Back Better' fund, which was available after EV067 was published, but this has resulted in a no award. No attempt was made to develop a strategy and then consider how it could be funded, rather a 'roll of the dice' was made on this application with no consideration given to investment were it not to succeed.

Q16. Has the Council engaged with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage?

We can find no evidence of these activities forming part of plan-making in respect of energy supply and public transport. For instance, there has been no proper assessment of the costs of energy (or energy reduction measures) with housing providers.

For this reason, the EV067 documents must be regarded a defective and an insufficient to support the draft Local Plan.

SUGGESTED AMENDMENTS

A) DP11 states:

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

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

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

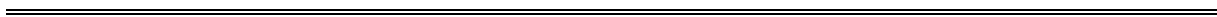
.....

Revise DP 11 para 4 to read:

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

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

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



B) SP12 5b) is drawn to suggest that local low carbon energy investment should be wholly local.

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

.....

Revise SP 10.3 5b) to read:

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

=====

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

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

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

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

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

.....

Remove the statement “Where ever possible” as this is an excuse not to install the equipment

New paragraph ‘f’ should read as;

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

=====

END