**Shropshire Local Plan Review – Strategic Sites Consultation**

**Shropshire Wildlife Trust comments.**

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We believe that local plans should pay at least equal attention to social and environmental aspects rather than have such a focus on economic growth. The strategic sites presented in the consultation document are opportunist rather than strategically selected to provide sustainable development. All in fact contain core areas and/or corridors identified within the Shropshire Environmental Network; a fact that would indicate that the natural environment was not a consideration in the selection of these sites.

National planning policy may require Shropshire Council to plan positively for growth, but it also requires that this is sustainable growth. In addition to the NPPF Shropshire Council should be contributing to national targets and plans. The Climate Change Act gives a legal requirement for Local Plans to contain policies which contribute to the mitigation of, and adaptation to, climate change such as zero carbon by at least 2050. While the Government’s 25 year environment plan requires that Local Plans should be providing “a real step change in our ambition for wildlife” and be putting “the environment at the heart of planning”. All of which is in line with Shropshire Council’s own Climate Emergency declaration.

For all the sites, and for the Local Plan in general, there should be:

* a commitment to measurable biodiversity gain
* facilitation of nature recovery networks
* a requirement for development to contribute to reducing to net zero carbon with key elements being:
	+ renewable energy generation
	+ prioritising sustainable travel modes such as walking, cycling and public transport
	+ carbon sequestration through creation of natural habitats

**Clive Barracks**

While we welcome the inclusion of green infrastructure within the indicative masterplan it is not particularly ambitious and it is unclear that there will be measureable biodiversity gains.

RAF Tern Hill Local Wildlife Site is immediately adjacent and the plans should recognise this. A ‘traditional’ stand off buffer is no longer viewed as adequate. Measures to enhance the LWS should be incorporated into the plan. An increase to both the extent and connectivity of the LWS would be in line current biodiversity requirements.

A watercourse on the site should be retained and enhanced to form part of the green space and provide an element of sustainable surface drainage.

We would question the need for reinforcements of the gas network. The site is not expected to be vacated until 2025 by which time there should be considerable movement towards zero carbon. In fact the Committee on Climate Change has recommended that there should be no new homes connected to the gas grid from 2025! The potential for alternative on site renewable energy generation should be explored with the ambition to create a zero carbon development.

The development plans should also include provision of public and sustainable transport, including footpath and cycle path link to Market Drayton.

**Former Ironbridge Power Station**

We welcome:

* the ecological assessments and surveys
* the inclusion of green infrastructure
* Harworth Group’s consultation with stakeholders and general pubic
* Reconnection of ecological and movement corridors/networks
* Inclusion of railway station and rail connection

However it is important that the natural environment in and around the site is enhanced to provide measurable net gain for biodiversity as required by the NPPF. This is particularly challenging given the location with the River Severn LWS, ancient woodland, SSSIs and a World Heritage Site all adjacent or in close proximity. Paragraph 175 of the NPPF makes it clear that development which is likely to have any adverse effect on SSSIs or ancient woodland should be refused. Therefore the green infrastructure proposed could and should be more ambitious. Maximising the opportunity to buffer and extend the adjacent sites of high ecological value such as the gorge woodlands and River Severn corridor. The eastern area of the site (phases 1 & 2) would benefit from a greater provision of additional green space to avoid a pinch point and reduce pressure on the river corridor and woodlands.

Utilising the existing rail link to provide a modern sustainable transport connection should be a key element of the project. Without this we would question how sustainable the site actually is as it is relatively poorly connected by road.

Given the long term nature of the proposals it is important that it delivers on sustainability targets. The potential for alternative on site renewable energy generation should be explored with the ambition to create a zero carbon development in line with national carbon reduction targets and Shropshire Council’s own Climate Emergency declaration.

**RAF Cosford**

We are not clear on the extent and scale of the proposals to re-use or redevelop the site. Therefore we find it hard to determine what the exceptional circumstances are that would justify any removal of areas from the Green Belt. As the current operations are undertaken within the Green Belt area is there actually any need to remove areas from the designation at all?

**Land north of Junction 3 of the M54**

A large scale development has the potential benefit of enabling well planned infrastructure to help deliver sustainable development. Substantial green space and biodiversity gains would need to be part of this as well as a requirement for zero carbon.

However such a development will have a very significant impact upon the existing landscape, ecology and would require the release of over 400 hectares of land from the Green Belt designation. Much of this land has been assessed as having a strong contribution to the purpose of “safeguarding the countryside from encroachment”. We do not see any exceptional circumstances that would allow this release of Green Belt land.

The site includes field systems that retain much of their pre-enclosure alignments, an area of ancient woodland and the river corridor of a tributary of the River Worfe. As with the other sites we would expect the planning policy to require a net biodiversity gain to be delivered and maintained by the development.

Pursuing these long term strategic development sites based primarily on short term economic gain and road transport connections is not the best long term sustainable solution. If the land north of junction three was to be further pursued there would need to be very significant improvement to sustainable and public transport options.