

## Consultation Form

**Part B Consultation Form:** Your Response(s) – this part (please fill in a separate Part B Consultation Form for each comment you wish to make, relating it to the relevant paragraph, policy (including its explanation) or site).

Please ensure that you also complete one **Part A Consultation Form** and submit this alongside you Part B Consultation Form(s).

We have also published a separate **Guidance Note** to assist in making effective representations.

### Part B: Response

Name:	Michael Hymas
Organisation (if relevant):	Stretton Climate Care

#### Q1. To which document does this response relate?

- Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

*(Please tick one box)*

#### Q2. To which part of the document does this response relate?

Paragraph:	3.28	Policy:	Policy SP3
Site:		Policy Map:	

*Please note: Responses to this Regulation 18: Consultation can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy (including its explanation) or site in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.*

#### Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

- Agree
- Disagree
- Don't know / no opinion

*(Please tick one box)*

**Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2:**

Although the Draft submission recognises that the UK's target for net zero emissions is now to achieve net zero emissions by 2050, the way in which this issue is dealt with is confused. The amendment to the Climate Act came into effect in June 2019 and now requires net zero emissions to be achieved by 2050 whereas the text of Paragraph 3.28 refers to a reduction by 80% and refers only to carbon emissions. It should be recognised that damaging greenhouse gases that contribute to climate change are far more than just carbon emissions. Shropshire Council declared a Climate Emergency in May 2019 and the Local Plan review does not reflect this decision and displays a significant level of complacency and misunderstanding in its approach to climate change. In particular, there is no encouragement for the generation of renewable energy by wind power, solar farms or other methods. There is no acknowledgement that achieving net zero emissions by 2050 may be too late to ensure that global temperature increase does not exceed 1.5°C and that action in relation to buildings and transport needs to occur earlier in this period rather than later. There is no reference to car-free housing potential and there is no reference to site selection based on trip estimation data by different modes. Data on trip estimation for new housing is available on the TRICS data base. The Shropshire track record of neglect and damage to walking, cycling and public transport is at variance with statements in SP3 and there is nothing in the Local Plan that demonstrates a reversal of these policies and a significant shift in the direction of supporting alternatives to the car.

It is regrettable and contrary to net zero carbon targets that trip estimation for different locations and configurations of walking, cycling and bus use opportunities have not been factored into locational decisions for new homes.

There is nothing in the Local Plan that gives substance to the aspiration of "maximising the ability to make trips by sustainable modes of transport". It is possible to produce substantial increases in walking, cycling and bus use and the interventions that deliver this increase are well documented e.g. Cornwall County Council's bus strategy making full use of the Bus Services Act (2017). Cornwall County Council makes sure that buses run 7 days a week and that one ticket for all local bus and train services can be purchased. Shropshire Council has not used the provisions of this Act to improve bus services and there is nothing in the Local Plan to indicate that this will be done in the plan period.

The draft local Plan does not give climate change the over-riding significance it deserves. It contains policies that will add to carbon emissions and it does not contain convincing evidence that the suggested policies will deliver carbon reduction.

In the preamble to Policy SP3, further confusion is created by reference to a "zero carbon economy". This is not possible. Many gases cannot be entirely eliminated, in particular methane, which is a far more potent greenhouse gas. In addition, the Policy requires only reductions in "carbon emissions", when there is a need to reduce greenhouse gas emissions including carbon emissions. It is possible to refer to greenhouse gas emissions in terms of their equivalence to carbon dioxide, but the draft does not do this. We must object strongly to this Policy on these grounds.

*Please succinctly provide all evidence and supporting information necessary to support your response. Please continue on a separate sheet if necessary.*

Completed Consultation Forms can be submitted by emailing:

[Planningpolicy@Shropshire.gov.uk](mailto:Planningpolicy@Shropshire.gov.uk)

*If submitting your own response, please enter your last name in the subject field of the email;*

*If submitting a response on behalf of a client, please enter their last name in the subject field of the email.*

Completed Consultation Forms can also be submitted by post to:  
**Shropshire Council, Planning Policy & Strategy Team, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND**

Office Use Only	Part A Reference:
	Part B Reference: