

Consultation on Shropshire Council Regulation 18: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038

Response from CPRE, the countryside charity (Shropshire Branch) - September 2020

Summary

This 5th round of 'informal Regulation 18' consultation was a bonus and allowed us again to lobby Shropshire Council and to marshal our arguments. We had expected this round to be the 'formal Regulation 19' consultation, at which we are really addressing the Inspector who will examine the plan and test it for 'soundness', rather than Shropshire Council itself, but that is now planned to happen at the end of the year.

We do endorse many of the policies within the Plan. We recognise the huge effort made by the limited number of officers involved, particularly during the Covid19 restrictions, although there are signs that this Draft Plan had been hurriedly put together and not properly checked. We too have limited resources to try to cover the whole of Shropshire, so have been selective in our comments.

We continue to believe that the continued aspirational growth preferred by Shropshire Council will not protect Shropshire's special qualities or serve its resident population to best effect, and that their plan:

- i) is suffused with a model for growth well in excess of demographic need, which is not truly sustainable, because it is at odds with both the climate emergency and the ecological emergency;
- ii) has targets for both housing and employment land that are too high, based on figures that are questionable;
- iii) won't get the right sort of houses, particularly affordable houses, built in the right places; and
- iv) has a flawed consultation process, which is undemocratic.

Covid19: The current COVID-19 crisis has caused widespread disruption to the economy and might well have caused society generally to re-appraise some of its priorities. Those changes may be so great as to alter the ethos behind parts of the Local Plan, particularly the drive for economic growth. There may instead be a realisation that economic stability and a smarter approach is more sustainable than a drive for growth.

Consultation: Our analysis of consultation responses from the first two consultations showed that people and Town & Parish Councils were overwhelmingly against the high targets; it is only developers and the council itself that wants them. The council's response to this evidence was, essentially, that a consultation is not a referendum, that although there was a majority for lower options, there was a good level of support for the highest option, that they knew what was best for most people, that what they were really looking

for was good arguments, and that if we disagreed we could argue the case in front of an Inspector. For this latest consultation, some evidence documents, stated to be Key, have not been published, because they weren't ready; the Council seems to think that that is alright as long as they are produced for the next round of consultation.

Climate Emergency: If minimising carbon emissions really is a priority, then the Council should seek to minimise necessary growth, not maximise it. Until zero carbon building is achieved (if it ever is), each piece of development will make the problem worse, not better. The aim for growth, or even business as usual, is therefore contrary to the Council's own Climate Change policies. What is needed is a 'step-change' in thinking, not a 'step-change' in economic performance.

Sustainability Appraisal: The Sustainability Appraisal is required evidence, putting all the policies and site allocations through a process of scrutiny, to see if they are sustainable. However, there is no obligation for the LA to act on its findings, and it can decide to proceed with a particular policy or site allocation mindful that it is not truly sustainable, by justifying that, on balance, the benefits outweigh the harm. The SA does not assess the likelihood of the intended outcomes of a plan being implemented as envisaged. For example, if a Plan aims to reduce the need for car travel, this scores in its favour despite the fact that this aim is rarely implemented to any meaningful extent

In the case of this consultation we criticise the SA because:

- The simplistic, binary scoring criteria used do not match the sustainability criteria used in the Hierarchy of Settlements assessment of villages to determine their suitability as Hubs. There is no weighting of the relative importance of each criteria
- The scoring is also relative only to other sites within the same settlement; the implication is that the best sites within a settlement are picked out, with little reference as to how they fit in to a county-wide standard.
- Little thought has gone into how well a site might help achieve carbon saving goals.
- Some sites have been allocated which do indeed perform poorly on the SA scores (the Ironbridge Regeneration site is one such). Mitigation is proposed for most of these, but some have been missed.
- There are other more minor criticisms

The housing numbers: The housing target of 30,800 is significantly more than the minimum of 25,894 required by Government, which itself is substantially more than the demographic need of only 20,746. It includes 1,500 houses from the Black Country which we think it is premature to accept, because their plan is a long way from being finalised and other authorities closer to ABCA might take more. There should be an even greater urban focus than there is. The target of 7,700 (25%) affordable houses is higher than currently achieved, but some 10,000 below the assessed need; building nine market houses for each one affordable house plainly makes the problem worse, not better. Supply remains underestimated. Concentrating on numbers says nothing about the mix of housing needed; the Strategic Housing Market Assessment (SHMA) that analyses the need does not fully match the other methods in the Council's toolbox.

The employment numbers: The aim of the Economic Growth Strategy to 'maximise our economic potential' is not only unrealistic but contrary to climate change goals. By breaking down the housing numbers into the four or five elements making them up it can be shown that the Council's 'balanced' growth calculations are illogical, including the fact that the

employment density they used (42.25sq m/job) does not accord with the 'smarter' jobs they say they aim for. Instead of the stated guideline of around 300 Ha of new employment land, maybe only 155 Ha are needed by reference to that 'balance' with housing. Furthermore, the guideline figures for the individual settlements in settlement policies S1-S21 add up to 375 Ha, which is 25% more than the overall figure of around 300 Ha. Also, the guideline figures for several individual settlements are anomalous, possibly vastly overpitched, and a long way from 'balance', most notably Bridgnorth, Shifnal, Oswestry and Market Drayton.

Other policies aiming for: high quality design; protection of water and flood mitigation; protection of the natural and historic environment, and the Green Belt and the AONB, are all welcomed but may be difficult to implement and may not go far enough. We do not agree with the proposed releases of Green Belt land, particularly the earmarking of unnecessarily large tracts of land as 'safeguarded' for development after 2038. We agree with others who call for an integrated Transport Policy which positively facilitates active travel in preference to car-based travel. The separate Place Plans that are largely concerned with the provision of infrastructure are slow to get anything spent on infrastructure, which lags well behind the building of development requiring it. That is one of the reasons why masterplans would be a good idea.

Settlement policies: we commented on some of the more anomalous settlement policies but our limited resources meant that we necessarily concentrated on the higher level policies.

Next steps: the next stage of consultation is the one that really matters. We have had little success in changing the direction of the Shropshire Council juggernaut (pins versus elephants come to mind) so our last chance, at the forthcoming 'Regulation 19' stage, is to convince the appointed Government Inspector that aspects of the final plan are 'unsound', based on some of our above comments. This next consultation is likely to be for the minimum period allowed, namely six weeks, which is set to straddle Christmas and the New Year, though that is a very tight timetable. After that, there will be a long public inquiry to go through the arguments, which is likely to be dominated by developers and their professional teams.