



Shropshire Local Plan Review
Consultation on
Preferred Scale and Distribution of Development

Response from the
Campaign to Protect Rural England
(Shropshire Branch)

December 2017

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Introduction

Q1 and 2: Respondent information

- 1.1. CPRE Shropshire welcomes the opportunity to respond to this Preferred Scale and Distribution of Development (Preferred Options) stage of the Shropshire Council Local Plan Review. Contact details are given in the covering e-mail submitted with this document.
- 1.2. This submission is made on behalf of CPRE Shropshire which is a registered charity run by volunteers, with one part-time employee, and which currently has 340 registered members/supporters. We do not have an e-mail address for 40% of these supporters, who are also unlikely to access any information on-line. This is indicative of the fact that a very significant proportion of the Shropshire population generally are likely to be disenfranchised by a consultation that is conducted largely on-line.
- 1.3. We believe that this Local Plan Review and this consultation give an important opportunity to shape the future of the County. CPRE Shropshire supports a beautiful and living Shropshire countryside that is valued and enjoyed by all. We support development in the right place which is sympathetic to the landscape and to the needs of local communities and those who work within them. We support building the right types of housing in the right places, in numbers that are clearly needed, to ensure that the County's special qualities are protected and that the genuine needs of its residents are met. We also support the targeted approach of the Productivity Growth economic option as originally put forward in the earlier Issues and Strategic Options Consultation, which would encourage the development of newer and more innovative industries.
- 1.4. We do not believe that continued aspirational growth will protect Shropshire's special qualities.
- 1.5. Shropshire Council officers and members are aware that CPRE has raised concerns about the Council's approach in this Preferred Options consultation, from when the documents were first put before Cabinet on 18 October 2017, and before that about its approach surrounding the consultation on the Economic Growth Strategy, and its subsequent launch to the Shropshire community. We have communicated with officers and members, both in meetings and by e-mail, and have attended consultation events, all in an attempt to understand the Council's position, and its thinking.
- 1.6. We do appreciate the pressures that the Council is under, from Government, from finances, from staff constraints, from time constraints, and from developers.
- 1.7. This document sets out our responses to the questions asked in the Council's consultation questionnaire. We reproduce each question before setting out our response to it. A summary of the key points from our responses is then set out in section 13. First, however we set out our more general concerns about the consultation process, having taken all the above into account.
- 1.8. Firstly, we set out again those concerns that were voiced in our consultation response at the Issues and Strategic Options Stage, and which still remain relevant. Rather than

appending our full response at that stage, we reproduce our relevant comments again, having updated them so far as they still apply, and added to them as appropriate:

- A. Out of date and incomplete information
- B. The lack of information relating to types of housing
- C. The Sustainability Appraisal
- D. The inter-relationship of Options
- E. Economic background, and assumptions made about the future economy of the County

1.9. Secondly, we make further general comments about:

- F. Our continued concerns about the consultation process
- G. Matters affecting the thinking behind the Local Plan Review and this Preferred Options stage, but which are not overtly brought out in the consultation papers and on which consultation responses are therefore not being sought in the consultation questionnaire.

General concerns

A. Out of date and incomplete information

- 2.1. The first concern is that the most recent Strategic Housing Market Assessment (SHMA) and Strategic Land Availability Assessment (SLAA) were both produced in 2014 for the SAMDev process. They are, therefore, to some degree, out of date and also they were prepared for a time period only up to 2026.
- 2.2. A new SLAA will be produced following the current Call for Sites (hopefully at the next stage of consultation in early 2018) and a SHMA is expected in due course though not in time for this consultation. Both are part of what is required to develop a plan according to Para 158 of the NPPF.
- 2.3. Para 014 of the NPPG Local Plan section explains a Local Authority's duties in this respect. It says:

'The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively'.

'Local planning authorities should publish documents that form part of the evidence base as they are completed, rather than waiting until options are published or a Local Plan is published for representations. This will help local communities and other interests consider the issues and engage with the authority at an early stage in developing the Local Plan.'

- 2.4. The FOAHNs of July 2016 and October 2017 sought to establish the quantum of development but not, and critically, the type of housing development actually needed. We comment in section 3 below on their weaknesses.
- 2.5. This means there is still no real explanation as to:
 - a. The reasoning behind the choice of those quanta of housing;
 - b. The impact that might have on other policy areas;
 - c. The impact that might have on the type of housing provided;
 - d. The level of allocated housing supply, as well as the potential for additional windfalls;
 - e. The realism of the economic growth projections; and
 - f. The justification for claims relating to the HS2 and other external factors.
- 2.6. Without that analysis by the Local Authority it is inevitably harder for external bodies to critically assess the Preferred Option now presented.

B. The lack of information relating to types of housing

- 2.7. CPRE does understand that this is a partial review. However we are concerned that it does not yet, at this stage of the consultation process, include options for the type of housing to be provided or how affordable housing will be prioritised.

- 2.8. The SHMA for SAMDev demonstrated the need for particular types of housing and, most obviously, to accommodate the aging population in the County, which is projected to continue whatever policies are pursued, not just because of the current retired population in the County but because of the bulge of 45-65 year olds in the demographic profile and the attractiveness of the County to retiring in-migrants.
- 2.9. It is an issue we specifically raised with the Council when we met officers in July 2016. The NPPG in relation to Housing Needs Assessment (Paragraph: 021 Reference ID: 2a-021-20160401) is clear on this point.

'Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities should therefore identify particular types of general housing as part of their assessment.'

- 2.10. More recently the Government has recognised the importance of this issue in the Housing White Paper by suggesting it will produce more specific guidance. Para 4.42 of the HWP says:

'To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people.'

- 2.11. While this guidance is not yet available we would like Shropshire Council to take the lead in seeking to develop policies in this review that will ensure housing is provided which is appropriate to older people. This will also help free up larger homes for the rest of the market. At the same time it could help to ensure the emerging plan remains consistent and up to date with policy in this area.
- 2.12. To help achieve this goal it will be essential that the updated SHMA includes some detailed analysis of the need for specific types of housing (as is being done in some other areas), including housing with additional provision for older people and housing that is wheelchair accessible, and that this evidence is used to inform specific policies and targets in the plan which goes for examination.

C. The Sustainability Appraisal

- 2.13. Firstly, in paragraphs 2.14 to 2.21, we repeat verbatim the comments we made at paragraphs 1.19 to 1.26 of our consultation response at the Issues and Strategic Options stage. Although these comments were clearly made under the heading "Sustainability Appraisal", for some reason they have not been captured in Appendix 1 of the SA for this Preferred Options stage, which lists four consultation responses, but not ours. There is therefore doubt as to whether they were taken into account at that stage. For greater clarity, we indent these comments.

- 2.14. The consultation is accompanied by a Sustainability Appraisal, based on a Scoping Exercise in Dec 2016. Not surprisingly the Sustainability Appraisal is fairly broad in its comments given the lack of detail on development proposals at the Options Stage. However, it seems to us flawed in how it addresses the baseline data.
- 2.15. While useful information is supplied in the Scoping Study, the Appraisal seems to assume that the baseline is (by default) an extrapolation of current policies. NPPG (016 Reference ID: 11-016-20140306) says that:
- 'The term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan and their likely evolution without implementation of new policies.'*
- 2.16. The interpretation in the SA leads, for example, to the conclusion that Option 2 for Housing has no adverse effects in many categories because it continues the current housing trajectory. This does not seem to allow the Sustainability Appraisal to consider the cumulative impacts of such an approach (as is required by Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004) or whether environmental limits would be breached as would be required if the Plan is to achieve: *'the objective of contributing to the achievement of sustainable development'* (NPPG: 001 Reference ID: 11-001-20140306.)
- 2.17. It is almost inevitable when considering Urban Extensions, for example, that the first ones given planning permission will be on less sensitive locations. So a continuation of Urban Extensions at the same location will be likely to increase the environmental impact in a non-linear way and have cumulative impacts alongside the other extensions.
- 2.18. It is also difficult to consider the Options for Distribution discretely to the overall numbers, not least because some areas of the County are more environmentally sensitive than others.
- 2.19. A further problem is the way mitigation is treated in the SA. Lack of development, for example, is seen as prohibiting investment in Public Transport. However, during recent years of significant development there have been many cut backs in public transport and experience suggests that however much Public Transport investment is put in place it will not compensate for the choice of a less sustainable, more car dependent location. [We now add that: The evidence of transport planning is straightforward. The best way to get sustainable transport is to start with sustainable places. Indeed, a greater threat to public transport up take, in our view, is the pursuit by the council of large scale road schemes, such as the Shrewsbury North West Relief Road].
- 2.20. Lastly the SA only considers the options set out in the document. It seems reasonable to us that an option equivalent to the Council's FOAHN, and a figure significantly below it, should both also have been included.
- 2.21. For all these reasons we are not convinced the SA, as it stands, provides a sound enough rationale for the comparison of all reasonable options.

2.22. These comments also remain valid at this consultation stage.

2.23. In addition, we understand that, in answer to questions from the Oswestry & District Civic Society about the SA, the Council has responded in connection with many sections of it that "*The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic*".

2.24. We also understand that the Oswestry and District Civic Society has undertaken a reappraisal of the SA using the professional judgment of its own professionally qualified expert. That reappraisal has concluded that overall the SA gives a negative assessment rather than the positive one claimed by Shropshire Council. The conclusion is consistent with our view that the Preferred Options Strategy does not represent sustainable development.

D. The inter-relationship of Options

2.25. The higher the levels of housing and economic development, as are now proposed in these Preferred Options, the more sensitive are likely to be the locations for development and this may affect the optimum distribution. The availability and quality of sites is likely to be a restrictive factor the higher the proposed levels of development, and this cannot be assessed at this stage in the absence of knowledge of specific sites.

E. Economic background, and assumptions made about the future economy of the County

2.26. We continue to favour a more targeted approach to the future economy of Shropshire that would encourage the development of newer and more innovative industries. We therefore believe it appropriate to repeat the arguments we made for the consultation on the Issues & Strategic Options Stage, and for the consultation on the Economic Growth Strategy.

2.27. Firstly then, in paragraphs 2.28 to 2.41, we repeat verbatim the comments we made at paragraphs 1.30 to 1.43 of our consultation response at the Issues and Strategic Options stage. Again, for greater clarity, we indent these paragraphs.

2.28. Para 154 of the NPPF says '*Local Plans should be aspirational but realistic*'. Local Authorities have been warned in the past against the use of predictions in LEP Bidding Documents, for example. The Options paper cites three key elements which it sees as supporting a bullish approach to future economic growth.

- i. The West Midlands Combined Authority (and Midlands Engine)
- ii. The Northern Powerhouse
- iii. The Northern Gateway.

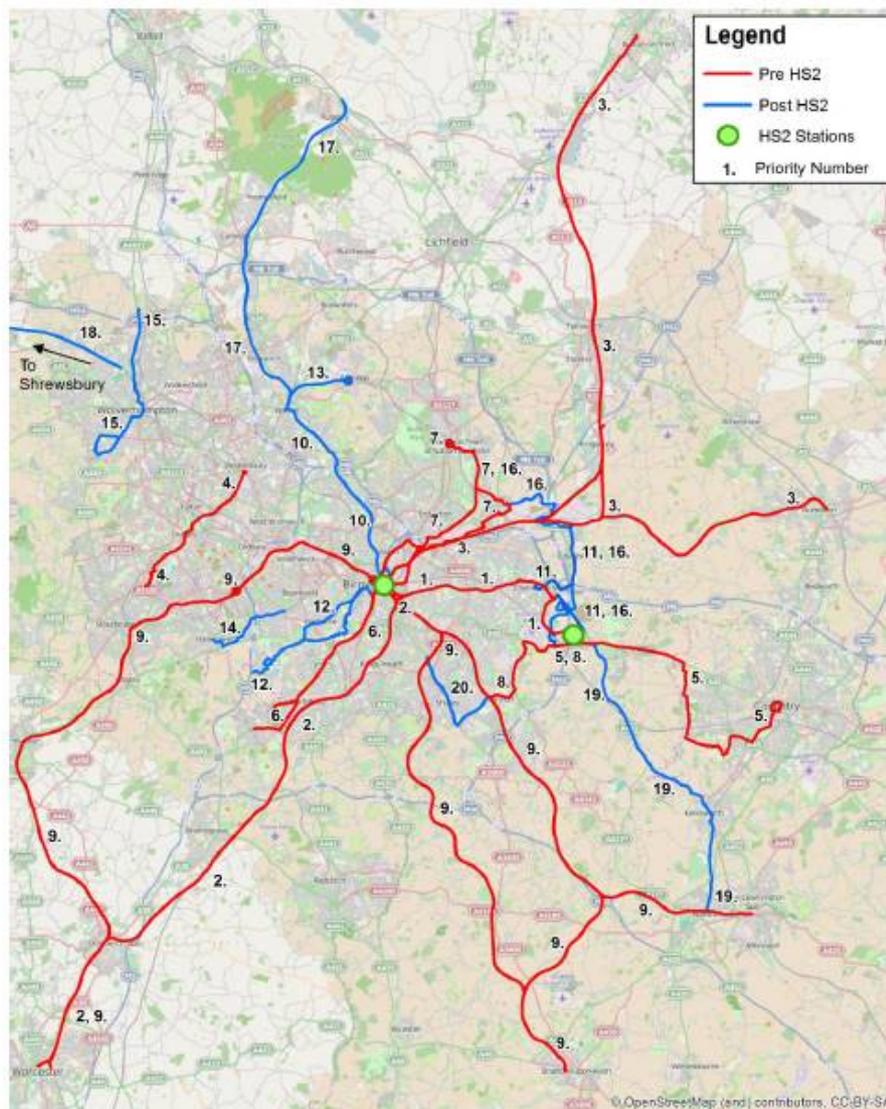
2.29. The paper does not seem to offer any specific clear reason why these should benefit Shropshire apart from their relative proximity, which may also mean they compete against Shropshire, especially if significant amounts of land and housing are released nearby.

i. The West Midlands Combined Authority (WMCA)

2.30. The WMCA is based around the West Midlands Conurbation. Telford and Wrekin are associate members but not Shropshire. In terms of the promotion of economic development their aim appears to be concentrated mainly on the conurbation and surrounding districts. A significant amount of their effort is based around the new HS2 Stations in Solihull and Birmingham and how to link those to other parts of the conurbation. It is true that they have identified development opportunities in areas closer to Shropshire but we see no reason to believe these are being prioritised.

2.31. The Midlands Engine and Midlands Connect (whose final report was delivered in March 2017) further dilute any possible benefits because their main impact is to improve connectivity between the WM conurbation and the East Midlands.

2.32. If one examines specifically the HS2 Connectivity Package they are involved in, it includes a large number of schemes for development prior to HS2 which would enhance connectedness around the conurbation and in the East Midlands, but only one scheme benefiting Shropshire (the electrification from Wolverhampton to Shrewsbury), to be considered after HS2 is in place.



Source: AECOM

2.33. The same scheme is identified in Midlands Connect for development work to commence between 2025 and 2030, with actual work in the longer term period of 2030 onwards.

ii. The Northern Powerhouse

2.34. It is hard to see how the Northern Powerhouse, which aims to enhance development across the North, would impact significantly on Shropshire.

iii. The Northern Gateway

2.35. The Northern Gateway is much closer and would create a major investment strategy around the new HS2 Crewe Station. It aims to provide 100,000 new jobs and 120,000 new homes around Crewe and North Staffordshire. It does not include Shropshire in its prospectus.

2.36. Immediately next to the HS2 station at Crewe the Cheshire East High Growth area includes nearly 340 hectares (Ha) of land.

2.37. The Northern Gateway Development Zone (NGDZ) prospectus also promotes a further 30 Ha at Winsford, 140 Ha in the Ceramics Valley Enterprise Zone, 34 Ha at Meaford, 152 Ha at Keele University, and 47 Ha at Blythe Valley.

2.38. While the HS2 station would have a 40 minute rail link to Shrewsbury it would also have similarly close links to Stoke, Stafford, Chester, Liverpool and Manchester. Within the Northern Gateway proposals, improvements are supported on the A500 from Crewe to Stoke and a new rail connection from the HS2 Station to the Stoke/Derby route which would further cement the economic gain to competing districts around the HS2 hub rather than to Shropshire.

2.39. Given such a dramatic change it is hard to do more than speculate about how the Gateway might benefit a peripheral County such as Shropshire, but previous history, both nationally and internationally, would suggest that improvements to transport infrastructure largely benefit those areas very close by whilst other areas only gain significantly if there are additional infrastructure investments.

2.40. It is not surprising that Shropshire wishes to promote itself on the back of HS2, but with so much land likely to become available more closely linked to the station it would seem that the greatest way Shropshire is likely to benefit is from attracting specific higher value economic activity drawn in by the environment and quality of the area.

2.41. It would also suggest that a higher level of housing, rather than supporting the County's economy, could simply create increased commuting to new sites in Crewe and elsewhere in the Northern Gateway (as well as allowing people to retire from surrounding areas). For this reason alone the optimum distribution of housing in Shropshire (between the three options) may vary depending on how much housing is proposed.

- 2.42. These comments remain relevant at this Preferred Options stage.
- 2.43. In our response to the consultation on the Economic Growth Strategy we referred to our above comments for the consultation on the Issues and Strategic Options stage of this Local Plan Review and went on to say (again indenting the relevant paragraphs for clarity):
- 2.44. In summary, we argued [at the I&SO stage] that developments elsewhere within the West Midlands Combined Authority (and Midlands Engine), the Northern Powerhouse and the Northern Gateway would not clearly benefit Shropshire apart from their relative proximity. That proximity may also mean that they compete against Shropshire, especially if significant amounts of land and housing are released nearby.
- 2.45. The I&SO consultation made only passing reference to the Marches LEP which is now also brought forward to support the Council's bullish ambition for economic growth. The NPPF requirement at paragraph 154 that '*Local Plans should be aspirational but realistic*' does not justify an overly bullish approach, nor '*a step change in . . . economic productivity*', nor an aim '*to achieve maximum economic productivity*'.
- 2.46. As to our responses to the detailed I&SO consultation questions 6 to 9, our view is that a prosperous future for Shropshire will probably rely on a targeted approach to higher productivity growth, which benefits from Shropshire's attractiveness, along with support for the rural and environmental industries which the area is best suited to attract. The provision of good quality broadband and smaller units, for example starter units, may be as important as large scale sites.
- 2.47. If Shropshire is to benefit from developments such as HS2 it needs to create its own particular offer, especially as there may be an excess of high quality sites coming on stream closer to HS2, rather than replicating what is available at better locations near the HS2 Northern Gateway station.
- 2.48. In general terms we would support Option 3: Productivity Growth, because a more targeted approach seems the most appropriate. The approach of Option 3 is, in our view, more appropriate to Shropshire and would encourage the development of newer and more innovative industries. It appears to us that Option 3, with some flexibility for review, is likely to be the most forward looking approach.
- 2.49. There is no need for Shropshire to compete with neighbouring authorities for employment opportunities. The approach to the economy should be a collaborative one.
- 2.50. Again, we believe these comments remain valid, particularly in view of our conclusion within our response to Question 4 below, that the Council's calculations are in error, and that they do not support an employment land need as high as the Preferred Option of 305 hectares.
- 2.51. We bring together here our previous responses to the consultation on the I&SO and the EGS for another reason, too. As the Council is aware, we have pointed out that the

consultation on the EGS was launched before the consultation on the I&SO had finished. There therefore remains doubt as to whether these two sets of consultation responses had been considered together.

F. Concerns about the consultation process

2.52. We begin our comments on the consultation process by repeating what we said in our similar comments of April 2017 on the Draft Economic Growth Strategy, namely:

It is our understanding that the legal Principles relating to “consultation” mean that a consultation process must satisfy the requirements of fairness.

- i) The essence of consultation is:
 - (a) That it must be undertaken at a time when the proposals are at a formative stage;
 - (b) It must include sufficient reasons for the particular proposals to allow those consulted to give intelligent consideration and an intelligent response;
 - (c) It must give adequate time to allow those consulted to give intelligent consideration and an intelligent response;
 - (d) The product of consultation must be conscientiously taken into account when the ultimate decision is taken.
- ii) Consultation axiomatically requires the candid disclosure of the reasons for what is proposed.

2.53. Shropshire Council is aware that CPRE has raised concerns separately about the consultation process surrounding the Economic Growth Strategy combined with the Issues and Strategic Options stage of the Local Plan Review; and has also raised concerns about the treatment of consultation responses to the Issues and Strategic Options stage in settling on the present Preferred Options. The communications relating to these concerns are reproduced at Annex 1 to this submission.

2.54. We recognise that Shropshire Council’s reasons for its treatment of the results of the previous consultation are that (1) a consultation is not a referendum, (2) responses to consultations do not stand alone, but that headline preferences expressed by a proportion of respondents are weighed both against (3) specific comments made, and (4) against existing and emerging evidence.

2.55. We contend that:

- i) The Council has not revealed clearly how such a weighing of consultation responses and new evidence has actually been done. This is the more important in the light of the recent Supreme Court decision that a Local Council must give clear reasons for its decisions.¹ The decision here is to adopt a position that is contrary to the majority view expressed in a consultation.

¹ Dover DC v CPRE Kent [2017] UKSC 79 see <https://www.supremecourt.uk/cases/docs/uksc-2016-0188-judgment.pdf>

- ii) The main new evidence is the Economic Growth Strategy, based on the IPPR North report, the thrusts of which were known to the Council at the time of the Issues and Strategic Options consultation, but were not revealed then. The Economic Growth and Employment options presented at that Issues and Strategic Options stage were therefore misleading.

2.56. The overlap of the consultations on Issues and Strategic Options and the Economic Growth Strategy has enabled the Council to introduce the new evidence of the EGS to the Local Plan Review process in a way that is not completely open.

2.57. The impression left is that the consultation process is a mechanism for Shropshire Council to seek views which support the direction in which it has already decided to go, and not to take on board views which run counter to that, even when those views are in the majority. That does not represent open consultation as set out at 2.52 above.

G. Matters affecting the consultation, but not consulted on

Constraints within the policy team and fear about becoming out-of-date

2.58. We acknowledge that Shropshire Council's planning policy team is small and is under-resourced; we acknowledge that the exercise involved in building up the Hierarchy of Settlements document was a considerable one, albeit largely a desk-top exercise; and we acknowledge that Shropshire Council is committed to a demanding programme for the Local Plan Review and is therefore reluctant to contemplate any change in its preferred course which might cause delay and increase the risk that developers or their agents will challenge the Local Plan for being out-of-date, as the latter stages of this Review process approach.

2.59. However, none of that should be a reason not to take on board, or to deflect, justifiable concerns about any aspect of this Preferred Options consultation.

Shropshire Council's finances

2.60. It appears that a significant reason for seeking growth is in order to increase Business Rates² and Council Tax, and to retain the New Homes Bonus³. To base the growth strategy of the Preferred Options on the need to generate money for the Council seems to us to be questionable, particularly when the Council, and the nation, are supposed to be seeking reductions in greenhouse gases.

2.61. Any Councillor in a Council meeting who failed to disclose a financial interest in an agenda item would be in breach of the Code of Conduct. This seems at odds with Shropshire Council's position of promoting an ambitious growth strategy without properly disclosing in the consultation documents what the financial implications to themselves might be. We believe that the Council should have made plain that its ambitious growth strategy

² George Candler's report to Cabinet, 1 March 2017, paragraph 4.1

³ Adrian Cooper's report to Cabinet, 21 June 2017, paragraph 4.1

produces money for itself, and that it should have included a consultation question about this.

- 2.62. Having to rely on growth to provide *“an opportunity to secure contributions to help maintain and improve local facilities, services and infrastructure”*⁴ also seems perverse. In a properly planned situation, the infrastructure to enable planned development should come first. We acknowledge that currently this rarely happens. Nevertheless, it shows that developers’ undertakings are not always fulfilled.
- 2.63. Because so much of development policy is driven by financial factors, we believe that the Council should promote a greater spirit of openness about this fact. Otherwise, a major motivating factor behind delivery of development remains hidden from view.
- 2.64. The way in which the Government’s cuts and austerity programme have affected Shropshire Council’s finances is a challenge to all concerned, relieved only marginally by DCLG’s announcement on 19 December of the revised local government funding arrangements for 2018 to 2019. It is an unstated reason behind much of the drive for growth within the current Preferred Options. However, we question whether persistent high growth can ever be justified on these, or other grounds.

Strategic Goals

- 2.65. Paragraph 1.7 of the main consultation document proposes ten strategic objectives for the Local Plan Review, which we summarise as follows:
- i) Provide an appropriate development strategy for 2016-2036.
 - ii) Secure a five-year land supply for housing and employment development.
 - iii) Support the development of sustainable communities, ensuring access for all to affordable homes etc.
 - iv) Develop the roles of Shrewsbury, Principal and Key centres.
 - v) Support rural communities through the delivery of local housing and employment opportunities.
 - vi) Promote sustainable economic development and growth.
 - vii) Support development of sustainable tourism, the rural economy, broadband connectivity and agriculture.
 - viii) Promote high quality design and locally attractive places.
 - ix) Protect Shropshire’s diverse and high-quality environment.
 - x) Improve outdoor space and recreation facilities for health and well-being.
- 2.66. The first seven of these are essentially as set out at the Issues and Strategic Options stage, but the last three are new additions at this Preferred Options stage.
- 2.67. Most of these strategic objectives are commendable, though we comment below on some inconsistencies between them and the Council’s approach within the Preferred Options. But we do question why comments on them are not specifically being sought in the consultation questionnaire, particularly in view of the changes made since the Issues and Strategic Options stage.

⁴ George Candler’s report to Cabinet, 18 October 2017, paragraph 4.1

- 2.68. The first inconsistency we point up is within objective ii) above. The five-year land supply may become difficult to support if delivery of development does not match targets. Why then has the Council set such high development targets? Surely if the five-year land supply status is to be protected (to avoid falling foul of NPPF paragraph 49), then it would have been more prudent to have set lower, more realistically achievable development targets?
- 2.69. The second inconsistency is within objective iii) above in connection with the delivery of affordable housing. Core Strategy policy CS11 set an initial target of 33% affordable houses. Delivery up to March 2016 was only about 20%⁵.
- 2.70. It is a constant and justifiable concern that there are insufficient affordable houses. It is a greater proportion of affordable houses that is needed. Relying on developers to provide those affordable houses is never going to provide the desired proportion of these affordable houses.
- 2.71. At paragraph 2.6 of the consultation document it is stated that *“Achieving the proposed ‘high’ level of growth at 28,750 dwellings . . . provides an opportunity to . . . increase the delivery of . . . affordable housing”*. This is hardly the way to achieve a higher proportion of affordable housing, so is rather a trite and misleading statement. Affordable houses are needed in their own right: it is not sensible to adopt a policy that requires four market, demand-led, houses to be built for the delivery of every one affordable dwelling.

Unpublicised background thinking

- 2.72. At the Cabinet meeting of 18 October 2017, when the Preferred Options papers were tabled for approval, some key aspects of the thinking behind the Local Plan Review and this Preferred Options stage were aired that are not publicised within the consultation papers. Those essentially private views, but nevertheless views that colour the Council’s strategy, have therefore not been offered by the Council for consultation.
- 2.73. Annex 2 is a transcript of the remarks given when introducing the Preferred Options papers by Councillor Robert Macey, the Portfolio Holder for Planning and Regulatory Services. Although officers consider that these introductory comments were entirely consistent with the thrust of both the Cabinet report and Shropshire Council’s published approach, and state that Councillor Macey’s introduction was checked verbally with colleagues in the Policy Team to that effect in advance of the meeting, we believe that his remarks did shine an instructive light on background thinking that is not made overt in the consultation papers.

Competition

- 2.74. Councillor Macey’s remarks about increasing competition to attract employment were particularly striking as new thinking, and not mentioned anywhere in the other papers. This implies that Shropshire Council is intending to enter a game of competitive leapfrog with its 11 neighbouring Local Authorities, each of them trying to outdo its neighbours to attract employees by building houses and creating employment sites. It is instructive to

⁵ Authority’s Monitoring Report (AMR), January 2017: figures on page 33, compared with total completions on page 19, show an average of 20.1%

note that Telford & Wrekin Council, for example, has just had its 20-year housing target of 17,280 new dwellings confirmed, compared to its new Government OAN figure of only 11,100. On that score, Telford & Wrekin already aspires to be 56% ahead of “need”, compared with Shropshire Council, whose Preferred Option is 13% ahead of the Government OAN figure. Telford & Wrekin is therefore already well ahead in this competition of aspiration.

2.75. We think that to act competitively in this Authority-centric way is to enter a misguided war of escalation. It would be better to co-operate with neighbouring Local Authorities rather than to compete with them (see paragraph 2.49 above). In fact the Housing White Paper requires LAs to prepare Statements of Common Ground⁶, “*setting out how they intend to work together to meet housing requirements that cut across authority boundaries*”. Telford & Wrekin has the greatest overlap of interests of any of the neighbouring LAs.

Ageing population

2.76. Councillor Macey also expressed concern about Shropshire’s ageing population and said that the latest ONS population projections estimate Shropshire’s 65 and over population will grow by 56%, making up 33% of our entire population by 2036, which is well above the national average.

2.77. We have interrogated these latest ONS population projections⁷, as used by Government in calculating the new housing need figures. Although it is true that the projections indicate that Shropshire’s 65 and over population will make up 33% of the population by 2036, Shropshire is only carrying on the national trend of an increasing proportion of over 65s, but starting from a higher base. The projected increase from 2016 to 2036 is 50%, not 56%.

2.78. In order to make Shropshire less attractive to retirees, the Council would have to destroy its tranquillity and beauty by turning it into a metropolitan borough. Is that really one of its strategic aims?

2.79. Having said that, we acknowledge what we said above in paragraph 2.8, that there is a need for particular types of housing and, most obviously, to accommodate the aging population in the County, which is projected to continue whatever policies are pursued, not just because of the current retired population in the County but because of the bulge of 45-65 year olds in the demographic profile and the attractiveness of the County to retiring in-migrants.

Top-down influence

2.80. There is also a genuine concern that the Preferred Options have been arrived at, not bottom-up from evidence, but top-down from political influence. A corollary to that is our fear that, whatever arguments are produced by us, they will be brushed aside by the

⁶ Fixing our broken housing market, February 2017, paragraph A.13

⁷ 2014-based Subnational population projections, Table 2: Local authorities and higher administrative areas within England, 5 year age groups, Persons, <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

Council because of political reasons, and because the Council's position is already so entrenched that it cannot contemplate adapting it.

- 2.81. A document that does provide some useful background, and a wider context to the Local Plan Review, is the Council's Corporate Plan 2016/17⁸, although it is not mentioned in the consultation documents.

⁸ Available at <https://shropshire.gov.uk/shropshire-council/corporate-plan/> , dated 21.11.16

We turn now to our detailed comments on the twelve consultation questions. A summary is then also given on pages 43 to 45.

Level of Future Growth

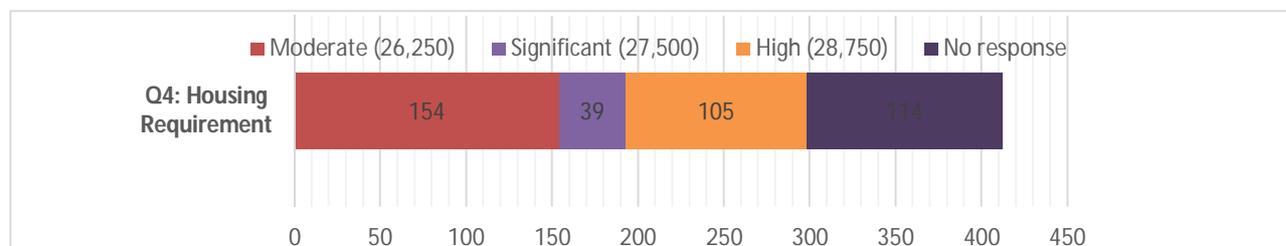
Q3 Do you agree with the preferred housing requirement proposed for Shropshire of 28,750 dwellings between 2016 and 2036 (1,430 dwellings a year), identified in Section 2 of the Consultation Document?

- 3.1. Our answer to Question 3 is “No”.
- 3.2. We think that the Council has set far too high a housing target. It is against public opinion. It is well ahead of its own so-called “objective assessment of need” and even further ahead of any genuine need. It is aspirational, based partly on the ambitious targets of the Economic Growth Strategy. Furthermore, such ambitious targets have not been deliverable in the past, so will make it harder for the Council to prove it has a five-year supply of housing. Failure to prove this leaves it prey to unplanned development by developers, just as it was before SAMDev was finally adopted.

Public opinion

- 3.3. For the record, we repeat the results of the previous consultation, although we are aware of the officers’ views about this (see paragraph 2.54 above).
- 3.4. The clear preference from the previous consultation was for the lowest option of 26,250 houses:

Housing requirement



Clear preference: Moderate growth : 26,250 dwellings

Note: The graphic above, prepared by CPRE, is derived from percentage figures quoted in the Issues and Strategic Options Consultation Response Summary published on 14/07/2017. In calculating those percentages, each of the 412 unique responses was given equal weighting, whether from an individual or from a body representing hundreds of people.

- 3.5. We have noted the Council’s reasons for not taking on board some aspects of the results of this previous consultation but we contend that it has not revealed clearly how it has weighted those various factors that have led it to a different conclusion.

Need

- 3.6. We are aware of the officers’ view that the absolute minimum housing target acceptable to a Government Inspector would be the so-called “objectively assessed need”. For the

twenty-year plan period the Council's figure of that is 25,178⁹ and the Government's "new" figure is 25,400¹⁰ (subject to the results of a consultation). Again, for the record, we set out a summary of the detail behind these calculations:

A breakdown and comparison of the new and old methods of calculating housing "need"

	<i>Old method</i>	<i>New method</i>		
	FOAHN Jul 2016	Gov't 10yr projection	x 2 for Plan period	20 year projection
Elements of the household projection figures				
From changes in population	9,800	5,986	11,972	10,454
From supposed decrease in average household size **	7,600	4,347	8,694	7,593
Total Government projection	17,400	10,333	20,666	18,047
Government uplift for "affordability ratio" of house prices to earnings		2,370	4,740	4,140
Excess above 4.0 of factor below, x 0.0625 of figure above				
Adjustment factor (median house price, divided by median earnings)		[7.67]	[7.67]	[7.67]
Increase because Shropshire Council uses a different computer programme to Government	5,100			
University Centre, Shrewsbury	1,100			
Increase in dwellings required because of 4.4% unoccupancy	1,100			
Concealed households	478			
Total household projection over the 20 years from 2016 to 2036	25,178		25,406	22,187
Average per year	1,259	1,270	1,270	1,109

3.7. Notwithstanding the fact that the Council's FOAHN has been examined extensively at Inquiry, we maintain that elements of it remain questionable when analysed in the way we have analysed it above. The above figure of 5,100 (characterised by us as described above) arose from the use of PopGroup, rather than the ONS figures. An element of it may be from unwitting double-counting of net migration between neighbouring local authorities. The questionable element of the Government's "new" method is the "affordability ratio", which is still subject to ratification.

⁹ Full Objectively Assessed Housing Need Report, July 2016 (FOAHN)

¹⁰ Derived from DCLG's: *Planning for the right homes in the right places: consultation proposals* as also summarised in the Council's FOAHN Supporting Document, October 2017

- 3.8. It is by coincidence, rather than by reason of any science, that the two figures (25,178 and 25,400) are so close to each other.
- 3.9. We contend that our analysis of these figures shows that the genuine “need” should be based on a demographic requirement of about 18,000 new dwellings with only small adjustments to account for legitimate increases such as some of the University growth. Even then, over 40% of that 18,000 is because of the questionable projection that average household size will fall¹¹; the effect of this assumption of a continued decline in average household size is further underlined by the fact that (on the latest ONS projections) a projected increase of only 24,100¹² in population over the twenty-year plan period is projected to produce 18,047¹³ new households. That equates to an apparent average household size of only 1.3 rather than the current actual figure of 2.3.
- 3.10. Our contention is that this distinction between “need” and “demand” should be clearly explained, and that it should be made clear to the public when consulting on housing and employment numbers.
- 3.11. All houses in excess of 18,000 can be thought of as aspiration and ambition, or the satisfying of demand, rather than genuine need, with the exception of a proportion of the additional need created by the University Centre, Shrewsbury, or by unoccupancy.

Significance

- 3.12. Eddie West maintains that the Council’s Preferred Option of 28,750 dwellings is not significantly different from the Government’s latest OAN figure of 25,400 dwellings (which the Council describes as the absolute minimum “need”). The difference is 13%, which we in contrast believe to be very significant. In the context of significance, we would point out that, before the Council was able to prove a 5-year supply of housing land, the 2013 calculation stood at only 4.95 years (although for Shrewsbury it was 5.28 years). By virtue of paragraph 49 of the NPPF, even this 1% shortfall proved highly significant because it enabled developers to argue successfully at appeal that paragraph 14 of NPPF therefore applied. The result was that development was allowed against the Council’s wishes and beyond the Council’s control.
- 3.13. Our argument is that an unrealistically high housing target will make it harder to prove a 5-year supply of housing land. Every percentage point above absolute necessity may therefore prove to be highly significant. As noted above, even a difference of 1% can prove to be significant, let alone a difference of 13%.

Relationship with Economic Growth Strategy

- 3.14. The stated reason for the Preferred Housing Requirement of 28,750 dwellings is:

¹¹ The ONS Statistical Bulletin: Families and Households in the UK: 2016 says:- *Average household size remains stable over the decade to 2016. There were 27.1 million households in the UK in 2016. The number of households has increased by 7% since 2006, similar to the growth in the UK population during this period. As a result average household size has remained at 2.4 people over the decade.*

¹² <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2> ; 312,400 for 2016, 335,500 for 2036

¹³ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections> ; 135,511 for 2016, 153,558 for 2036

“to achieve the Preferred Development Strategy in Section 1 of this document”¹⁴.

This Preferred Development Strategy is stated as follows:

“The preferred development strategy seeks to make the best use of the strategic advantages of Shropshire’s geographic location to support a sustainable pattern of future growth over the period 2016-36 and to support the growth aspirations of neighbouring areas, particularly in the north and east of the County. The preferred strategy will help support the ‘step change’ in economic productivity and quality of employment which is set out in our new Economic Growth Strategy.”¹⁵

- 3.15. From this it is clear that it is the Economic Growth Strategy that is a major driver of the Preferred Options, including its emphasis on Shropshire providing spin-off development from anticipated growth over the borders in the north (HS2/Northern Gateway¹⁶ and the Northern Powerhouse¹⁷) and the east (Midlands Engine¹⁸). Plans for a HS2 station and 120 Ha of associated development land at Crewe are still at a formative stage and would not be delivered, if at all, until 2027 at the earliest; it may therefore be premature to base plans for spin-off growth in north Shropshire on this in this current review of the Local Plan.
- 3.16. Nowhere is it stated why the Preferred Development Strategy cannot be achieved with the lower targets preferred by people during the last consultation. Shropshire Council is making the simplistic assumption that *“to make the best use of the strategic advantages of Shropshire’s geographic location”* means to make maximum use of them. We contend that pursuit of a maximisation of aspirational growth will not protect Shropshire’s special qualities, including its tranquillity and landscape qualities, and that it will therefore not be the best use of the advantages of Shropshire’s geography.
- 3.17. Moreover such an aspiration may well not be achievable in competition with local authorities better placed to take advantage of HS2 and other development plans. It would be better to concentrate on Shropshire’s particular offer.
- 3.18. Much of the reason for setting such high targets is stated to be to “balance” the aspirational step-change of the Economic Growth Strategy¹⁹. We comment further on this “balance” in section 4 below.

Five-year housing land supply and deliverability

- 3.19. Despite the higher delivery in 2016/17 of 1,910 dwellings, the overall delivery for the first eleven years of the current Core Strategy period remains at only 90%²⁰. This persistent

¹⁴ Page 10 paragraph 2.4

¹⁵ At the top of the box at the foot of page 3

¹⁶ The Northern Gateway Development Zone was renamed as The Constellation Partnership in March 2017, this is a collaboration between seven local authorities and two Local Enterprise Partnerships. These are Cheshire and Warrington Local Enterprise Partnership, Stoke-on-Trent and Staffordshire Local Enterprise Partnership, Cheshire East Council, Cheshire West and Chester Council, Newcastle-under-Lyme Borough Council, Stafford Borough Council, Staffordshire County Council, Staffordshire Moorlands District Council, and Stoke-on-Trent City Council

¹⁷ Page 7, paragraph 1.14ii

¹⁸ Page 7, paragraph 1.14i

¹⁹ Page 10, paragraph 2.8 and box at the top of page 14

²⁰ Target 14,290, delivery 12,812, derived from Five Year Housing Land Supply Statement to 31 March 2017, page 10, Table 4

under-delivery makes it harder to prove the availability of a five-year housing land supply. It seems more prudent to adopt a housing target which is more realistically achievable.

- 3.20. The Council claims that 11,465 dwellings are in the pipeline through existing permissions and prior approvals. This figure is derived from the Appendices to the Five Year Housing Land Supply Statement to 31 March 2017. We have not yet had the capacity to analyse the 2016/17 figures, but an analysis of the 2015/16 figures showed that one-sixth of extant permissions were over three years old, and over one-ninth were over five years old. Some dated back to the 1980s. This surely leaves the figures open to challenge that they are not all truly deliverable, even after applying the 10% discount, with the consequent threat to being able to prove a five-year housing land supply.
- 3.21. This number of new houses represents a further 21% increase in houses over the next 20 years (for Shrewsbury it is a 26% increase).
- 3.22. In this regard it is regrettable that we do not yet have an up to date SLAA, which would allow external organisations to examine assumptions implicit in this supply of dwellings including sites considered but not currently available, assumed density levels on allocated sites and windfall provision. It is essential that the supply figure is reviewed and there is sufficient time for outside bodies to interrogate it.

Affordable homes and types of housing

- 3.23. As stated above, it is said that building so many houses will provide more “affordable” homes. In fact the maximum proportion of a development that Shropshire Council requires developers to set aside for affordable housing is only 20% (in the south of Shrewsbury and the County). Around Oswestry and Ellesmere it is only 10%. So relying on developers to build the houses we are said to need is never going to produce the proportion of affordable houses that are in fact needed. The high targets may simply make the problem worse.
- 3.24. In general, rather than concentrating solely on the quantum of housing (and relying on that to provide the bulk of affordable homes), there needs to be some emphasis on specifying the types of housing required and on supporting specific providers such as housing associations and small builders. It is unsatisfactory if this is to be left to the next stage of consultation. There is a substantial need for houses which are aimed at older people (e.g. bungalows), more wheel chair accessible houses and houses which have access to services and public transport without the need of a motor car. If this cannot be adequately supplied by the market, there may need to be policies in place to encourage e.g. registered social landlords and smaller builders.

Sustainability

- 3.25. We argue that the persistent growth which Shropshire Council continues to favour is not truly sustainable in the long term. Only when all resources are completely renewable can long-term sustainability be achieved. Only when human activities are carbon neutral can we be said not to be contributing to climate change. We believe that to plough ahead with persistent growth without recognising these issues is irresponsible and short-term in terms of strategy. Human activities have at some stage to become a steady state to avoid persistent growth becoming infinite growth, which is clearly unsustainable.

- 3.26. In particular we contend that the impact of the proposed level of growth would have potentially serious impacts on the countryside, accessibility to open space, biodiversity and rises in transport, particularly in the private car, with implications for pollution levels and public health.
- 3.27. Paragraph 2.3 of the SA Summary (paragraph 3.6 of the detailed SA) essentially recognises these serious impacts without, in our view, putting forward any mitigating measures that are actually likely to be achievable in practice.
- 3.28. Page 2 of the NPPF says of “Achieving sustainable development”:

International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy “Securing the Future” set out five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

- 3.29. We contend that the persistent growth that the Council favours will, little by little, *compromise the ability of future generations to meet their own needs.*
- 3.30. The Council’s Sustainability Appraisal, prepared to support this Preferred Options stage, does not dispel this contention. Oswestry & District Civic Society argues in its own separate submission, which we endorse, that the Council’s Sustainability Appraisal is flawed and that the Preferred Options for Housing Requirement as put forward by the Council do not constitute sustainable development.

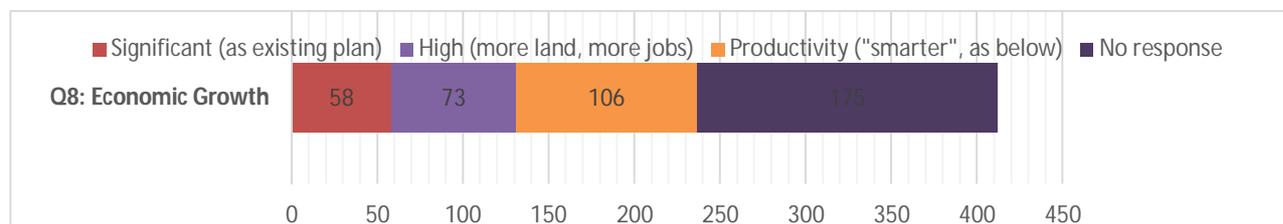
Q4 Do you agree with the preferred employment land requirement proposed for Shropshire of 305 hectares between 2016 and 2036 (15.25 hectares of employment land a year), based on the concept of ‘balanced’ employment and housing growth, identified in Section 3 of the Consultation Document?

- 4.1. Our answer to Question 4 is “No”.
- 4.2. We consider that the Council has set a far too ambitious employment target. It is against majority public opinion. It is too aspirational, based on the ambitious targets of the Economic Growth Strategy, which itself is based on questionable evidence. The Council has changed the Economic Growth/employment option it offered for consultation at the Issues and Strategic Options stage. Its calculations are dubious. Furthermore, such ambitious targets have not been deliverable in the past, and their sustainability is questionable.

Public opinion

- 4.3. Again, for the record, we repeat the results of the previous consultation, although we are aware of the officers’ views about this (see paragraph 2.54 above).
- 4.4. The clear preference from the previous consultation was for Productivity Growth, which at the time of the Issues and Strategic Options consultation, was defined as below:

Economic Growth



Clear preference: Productivity growth: This option would create a higher aspiration to provide more ‘higher value’ jobs whilst potentially setting a lower employment land requirement and a lower overall provision of new jobs.²¹

Note: The graphic above, prepared by CPRE, is derived from percentage figures quoted in the Issues and Strategic Options Consultation Response Summary published on 14/07/2017. In calculating those percentages, each of the 412 unique responses was given equal weighting, whether from an individual or from a body representing hundreds of people.

Economic Growth Strategy - change of offer

- 4.5. The Council’s preferred option is now for 305 Ha of new employment land, supporting over 14,900 new jobs. This is effectively the “high growth” option from the Issues and Strategic options stage, which was stated as giving a “higher level of aspiration supported

²¹ Consultation on Issues and Strategic Options, box on page 24

by an appropriate employment land requirement, providing a higher level of employment land supply and delivering a higher level of new jobs".²²

- 4.6. Nowhere in the Issues and Strategic Options consultation was there any mention of either a need or an aspiration for 14,900 jobs. The only number of jobs mentioned was 9,300: all three options offered at that Issues and Strategic Options stage were *"supported by the demand forecast for Shropshire to provide at least 9,300 jobs"*.²³
- 4.7. The Council has changed what is on offer between the Issues and Strategic Options stage and this Preferred Options stage, without any consultation on it within the Local Plan Review process. Officers say that the new strategy of seeking a "step-change" in Shropshire's economy was implied within the Issues and Strategic Options stage, but the only mention of a "step-change" was in connection with housing, not economic growth²⁴.

Questionable evidence supporting Economic Growth Strategy

- 4.8. We believe that it is the Economic Growth Strategy which is a significant driver for the current Preferred Option for both employment land and for housing. We appreciate that the Council's Economic Growth Strategy was adopted by the Council in July 2017, after receiving 68 unique responses to the consultation on it which overlapped with the consultation on the Issues and Strategic Options. However its impacts on the Local Plan Review process have not yet been subject to consultation. It is therefore relevant to examine how sound the Economic Growth Strategy is as a basis for the current Preferred Options.
- 4.9. The underlying report behind the Council's Economic Growth Strategy was by IPPR North. It began by promising at its very outset that *"Shropshire can be a world leading rural economy by 2030"*. Currently Shropshire Council is about 30th out of 40 English Counties in the economic league table (with a GVA per head of about £20,000, compared with the top score of over £40,000 per head). The promise of becoming a world leading rural economy appears to be an impossibly over-ambitious aspiration.
- 4.10. Because of the significance accorded to the IPPR Reports by Shropshire Council we have looked at them closely and to our considerably surprise, have found over 50 errors within them. Many of these are proof reading errors, speaking of careless and unprofessional production, but some of them are more fundamental. Its conclusions appear to stem from discussions rather than from the apparent evidence contained in the report. Our detailed review of the IPPR North reports is appended as Annex 3.
- 4.11. We contend that the validity of the IPPR North reports is questionable because:
- i) Within its evidence sections, no significance is attached to differences between metrics for Shropshire and those for the UK as a whole. It is quite meaningless to compare a largely rural county like Shropshire with the largely metropolitan UK, without any attempt to put differences into context. The IPPR North report itself highlights the rural and sparsely populated nature of Shropshire when it says of

²² Consultation on Issues and Strategic Options, lower box on page 23

²³ Consultation on Issues and Strategic Options, pages 23 and 24

²⁴ Consultation on Issues and Strategic Options, page 16

Shropshire “there are just 97 people per square km, compared with 353 people per square km in England as a whole (excluding London)”.²⁵

- ii) In any case, the conclusions of the report are based not on evidence, but on round-table discussions, several of which were internal to Shropshire Council itself. It is therefore a subjective report, rather than an objective one.
- iii) There is no attempt at any assessment of sustainability, or of carbon balance, nor is there such an assessment for the Economic Growth Strategy itself. There is therefore no evidence that the strategies proposed by the IPPR North reports, or by the Economic Growth Strategy, represent sustainable development.

4.12. Our conclusion, on this basis alone, is that the Council’s Preferred Economic Growth and Employment strategy is unsound.

Economic Growth and Employment - dubious calculations

4.13. The Council maintains that 288 Ha of employment land are needed to support its Preferred Option for 14,900 new jobs. By a mathematical formula, it also thinks that 28,750 new dwellings will generate an anticipated employment need requiring 304 Ha of employment land. This near equivalence of two separate calculations is what we understand to be the Council’s concept of ‘balanced’ employment and housing growth mentioned above.

4.14. The Council’s calculations for this are set out in *Appendix 2: Identifying the Employment Requirement*, on pages 40 and 42, in Tables 6 and 7, which we reproduce below:

Table 6: Employment Land Requirement from Jobs Growth Forecasts 2016 - 2036

	Employment Growth 2016 - 2036 (Jobs)	Total Employment Floorspace - Growth* (ha)	Total Employment Floorspace - Loss* (ha)	Total Employment Floorspace Need (ha)	Employment Land Requirement** (ha)
Productivity Growth	14,900	140	-25	115	288
Baseline Growth	9,300	85	-30	55	138

*Average of appropriate sector / job densities in Employment Density Guide 3rd Edition (November 2015) Homes and Communities Agency. This comprises an average of 42.25sq.m/job from Offices (aligned with Finance & Professional Services) + 16sq.m/job, Light Industrial = 47sq.m/job, Industrial & Manufacturing = 36sq.m/job and Storage & Distribution - Final Mile = 70sq.m/job.

**Employment land in Shropshire historically delivers floorspace on 40% of the site area

Table 7: Employment Land Requirement from Housing Growth 2016 - 2036

	Housing Growth 2016 - 2036 (Dwellings)	Anticipated Employment Need 2016 - 2036 (Jobs)	Average Employment Density* (sq.m/job)	Total Employment Floorspace Need (ha)	Employment Land Requirement** (ha)
Balanced Growth	28,750	28,750	42.25	121	304
Core Strategy 2011)	27,500	27,500	42.25	116	290
FOAHN: Current Methodology	25,178	25,178	42.25	106	266
FOAHN: Draft Proposed Methodology	25,400	25,400	42.25	107	268

*Average of appropriate sector / job densities in Employment Density Guide 3rd Edition (November 2015) Homes & Communities Agency. This comprises an average of 42.25sq.m/job from Offices (aligned with Finance & Professional Services) + 16sq.m/job, Light Industrial = 47sq.m/job, Industrial & Manufacturing = 36sq.m/job and Storage & Distribution - Final Mile = 70sq.m/job.

**Employment land in Shropshire historically delivers floorspace on 40% of the site area

²⁵ IPPR North report, page 6, 2nd sentence under 2.2.1. Background

- 4.15. Liam Cowden has confirmed by e-mail that the note below Table 6 is incorrect. The average sector/job densities as shown there in fact apply only in Table 7.
- 4.16. The figure of 14,900 in Table 6 is derived from a spreadsheet entitled "Productivity Growth Forecast" as posted on the Council website²⁶. Liam Cowden, by e-mail, has explained that this spreadsheet is from Oxford Economics, and is not supported by any actual report. He wrote on 12 December 2017:

The instructions to Oxford Economics were:

Baseline Forecast - to use their model to project changes in the Shropshire local economy based on the current operation and performance of its economic sectors.

Productivity Growth Forecast - to use their model to forecast how the Shropshire local economy might increase its GVA growth at a faster rate towards the UK average.

The forecast data is produced from the predictive statistical model operated by Oxford Economics using their expertise in forecasting how local economies including Shropshire are likely to perform. The data illustrates the circumstances under which a faster rate of GVA growth might potentially be achieved over the Local Plan Review period. Our commission sought to describe how the Shropshire economy might change as a result of demands for growth and how Shropshire might change and adapt to these demands. The data provides an answer to the questions about how Shropshire and its local economy might perform and the data is presented so that respondents might form their own opinion.

A report from Oxford Economics would not explain any of the detailed assumptions behind their forecast because these assumptions are core elements of their model and as such, are subject to commercial privilege. A written report would also add little to the comprehensive numerical description of the forecast changes in Shropshire which enables the reader to reach their own conclusions. Consequently, whilst it is not possible to directly challenge the manner in which Oxford Economics have set about forecasting Shropshire's future growth, the forecast may or may not be accepted and respondents are free to present their reasons either way.

- 4.17. Mr Cowden has also confirmed that the only "product" derived from the above instruction to Oxford Economics was the Productivity Growth Forecast spreadsheet. He has confirmed that there is no actual explanatory report available from Oxford Economics and that the data is presented so that people might form their own opinion. This seems a rather unhelpful, take-it-or-leave-it position to take for a set of figures that is so fundamental to the Council's Economic Growth and Employment strategy. We note that the same set of figures from Oxford Economics, carrying the date January 2016, has also been used by IPPR North in their report.²⁷
- 4.18. Our interrogation of this spreadsheet has revealed that it contains some questionable figures. For example:

²⁶ <http://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/evidence-base/>

²⁷ IPPR North report, page 27, Table 4

- i) The Council's two FOAHN assessments (for 25,178 and 25,400 new houses) are based on population increases of 22,600 and 24,100 between 2016 and 2036, whereas the "Productivity growth forecast.csv" spreadsheet forecasts an increase of 29,000. Liam Cowden, by e-mail on 12 December 2017, responded that *"the projected population increase provided by Oxford Economics indicates a forecasted population growth required to achieve the forecasted economic outputs. The population growth in the FOAHN would indicate that the changes forecasted by Oxford Economics are likely to be challenging"*.
- ii) The GVA per employee for Electricity, gas, steam and air conditioning supply is £250,000 at 2016 and £615,000 at 2036. Without seeing the rationale behind the bare figures, this huge increase in an already very high figure does seem unlikely.

4.19. We therefore question the basis of the figures in the spreadsheet. This in turn calls into question the figure of 14,900, which in turn calls into question the whole basis of the Council's Preferred Option for high growth, and therefore the soundness of its approach.

4.20. Turning to Table 7, the assumption contained within its first two columns is that each dwelling produces only one employee. That is not quite borne out by other figures. At 2016 the estimated number of dwellings in the Shropshire Council area was 142,700²⁸. The estimated number of jobs in January 2016 was 147,400²⁹. That equates to an average of 1.03 jobs per dwelling.

4.21. Shropshire Council believes that 14,900 jobs are required to support its Economic Growth Strategy, and Table 6 shows that those 14,900 jobs require 288 Ha of employment land, using the assumptions, embedded in the table, about sector/job densities and average floorspace provided on an employment site.

4.22. Working backwards from that 288 Ha of employment land, using the average job density of 42.25 sq m, the average floorspace provision of 40% on a site, and the jobs/household of 1.03 per job, then only 26,472 new dwellings would be required. This is close to the 26,250, or Moderate Growth option, which was the preference of the majority of respondents to the previous consultation.

4.23. But leaving this aside, there is a huge mismatch in the two sets of figures in Tables 6 and 7. Table 7 uses an average job density of 42.25 sq m per job, which is a simple average of the four figures for sq m per job for the four employment types quoted. Table 7 therefore assumes that jobs will be provided in only four sectors requiring employment land, and in equal proportions between them.

4.24. In Table 6 the average job density is effectively 77.18 sq m per job³⁰. That is a figure which we assume has stemmed from the application of the appropriate sector/job densities (from the Employment Densities Guide 3rd Edition, 2015) to the industries as

²⁸ FOAHN July 2016, Table 22, page 61, V5B Ten Year Trend - including students

²⁹ Productivity Growth Forecast, total Employment by sector for 2016; reproduced by IPPR North report, page 27, Table 4, date given as January 2016

³⁰ 115 Ha x 10,000 / 14,900

listed in the Employment by Sector section of the Productivity Growth Forecast spreadsheet.

- 4.25. The Employment density matrix in the Employment Densities Guide 2015 is categorised by Use Class, whereas the Productivity Growth Forecast categorises employment by SIC code. It is therefore not a straightforward exercise to attribute job densities from the Employment Densities Guide 2015 to the Productivity Growth Forecast employment categories, in the way suggested by paragraph A2.12, and footnote 20, of the consultation document.
- 4.26. However, we have attempted to replicate the exercise, and our resulting calculation of the total employment land requirement from the additional 14,900 jobs is only 118 Ha, rather than the 288 Ha shown in Table 6. That is not surprising, given that the aim of the Productivity Growth model is to increase productivity. An average job density of 77.18 sq m per job, compared with the average of 44.25 used in Table 7, does not imply greater productivity.
- 4.27. Our calculation of an employment land requirement of only 118 Ha is also not surprising given that the greatest percentage increases forecast within the Productivity Growth Forecast spreadsheet are in Construction, Information and communication, Professional, scientific and technical activities, Administrative and support service activities, and Arts, entertainment and recreation. All these are forecast to have an increase of over 20% between 2016 and 2036 and most, if not all of these have a low figure for sq m per job, or else no land requirement at all.
- 4.28. The average job density of 77.18 sq m per job contained within the figures within Table 6 is also surprising, given that the maximum job density quoted in the note below Table 7 is 70 sq m per job.
- 4.29. The conclusion is that the implied job density of 77.18 sq m per job in Table 6 is unsound. Consequently the Council's conclusion, that 288 Ha of employment land will be needed, is also unsound.
- 4.30. If the average job density of 42.25 sq. m. per job as used in Table 7 is applied to Table 6 then the employment land required to service 14,900 extra jobs is only 157 Ha.
- 4.31. Of course, we acknowledge that the level of economic land provision will also have to take account of the deliverability of sites, the provision of choice in the market and the potential loss of some sites to housing. However, we do not consider that is likely to justify the higher figure, which may lead to land coming forward in a way that hinders other sites in need of remediation. An up to date analysis of the availability of sites is something which we expect to be included in the evidence base.
- 4.32. All the above shows that the Council's Preferred Option for Economic Growth and its Preferred Option for housing growth are in reality a long way from being soundly researched or "balanced".

Sustainability and selection of sites

- 4.33. Our comments under paragraphs 3.25 to 3.30 for the housing requirement apply equally to Economic Growth and Employment. Paragraph 3.3 of the SA Summary (paragraph 3.10 of the detailed SA) is almost identical to paragraph 2.3 of the SA Summary (paragraph 3.6 of the detailed SA); again we comment that these paragraphs essentially recognise these serious impacts without, in our view, putting forward any mitigating measures that are actually likely to be achievable in practice. The professional judgement embodied in the Oswestry & District Civic Society's separate submission, which we endorse, indicates that the Council's Sustainability Appraisal is flawed and that the Preferred Option for Economic Growth and Employment as put forward by the Council does not constitute sustainable development.
- 4.34. In any case, employment development should be carefully selected in rural areas. Current employment sites should be fully used and expanded where possible before contemplating new sites, which should be near transport links.
- 4.35. Currently observation reveals that there are many unused employment sites already available, and no commercial activities to fill them. Unused and already allocated sites should be used in preference to making fresh allocations.
- 4.36. For example, the graphic on page 2 of the Council's Corporate Plan 2016/17³¹ states that 0.84% of businesses contribute 29% of net business rate. This indicates that a targeted approach, concentrating on high quality employers and employment sites, is likely to yield the greatest benefit.
- 4.37. This is something which hopefully will be informed by up to date supply-side information.

³¹ Available at <https://shropshire.gov.uk/shropshire-council/corporate-plan/> , dated 21.11.16

Distribution of Future Growth

Q5 Do you agree with the preferred spatial distribution of the proposed housing and employment requirements, which has an 'urban focus', identified in Section 4 of the Consultation Document?

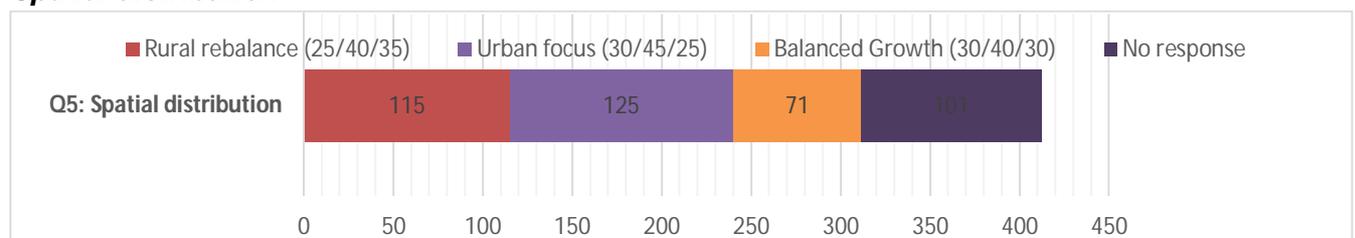
'Urban Focus' responds directly to the County's Economic Growth Strategy and specifically reflects the objective to prioritise investment along strategic corridors and growth zones, utilising existing road and rail connections. It seeks to broadly distribute development across the County in the following manner: Strategic Centre (Shrewsbury) - around 30%; Principal Centres - around 24.5%; Key Centres - around 18%; Rural Areas - around 27.5%. (These centres are listed in Q6).

- 5.1. In general terms we would support a greater Urban Focus, which is close to public opinion. However, not enough detail has yet been revealed about where the proposed 7,875 rural houses will go and, as we know, the devil is in the detail. Furthermore, bearing in mind what we have said in response to questions 3 and 4, the quantum of the proposed distribution of housing and employment requirements to each settlement is questionable, and we therefore do not support the individual figures for each settlement.

Public opinion

- 5.2. Again, for the record, we repeat the results of the previous consultation, although we are aware of the officers' views about this (see paragraph 2.54 above). The clear preference from the previous consultation was for Urban focus, and the proposed Preferred Option is close to, but not identical to, that.

Spatial distribution



Clear preference: Urban focus: 30% Shrewsbury; 45% market towns; 25% rural

Note: The graphic above, prepared by CPRE, is derived from percentage figures quoted in the Issues and Strategic Options Consultation Response Summary published on 14/07/2017. In calculating those percentages, each of the 412 unique responses was given equal weighting, whether from an individual or from a body representing hundreds of people.

Rural allocations

- 5.3. Because no rural settlement can provide as full a range of services as does an urban centre, the environmental and societal costs of development in rural locations will be greater than in more urban areas.
- 5.4. We cannot comment fully on the proposal to put 7,875 houses in rural areas until we know in more detail where Shropshire Council proposes to put them. We understand that the

allocations of these 7,875 rural houses between villages, the designation of specific sites, and the setting of development boundaries, will not be revealed and consulted on until Spring 2018, after officers have been able to assess the approximately 2,000 sites resulting from the "Call for Sites".

- 5.5. It is anticipated that a large proportion of the proposed distribution of 7,875 houses for rural areas will be divided amongst the proposed 40 Community Hubs. If so, this would average almost 200 houses per settlement, and would increase the housing stock in those Hubs by 40%. This is too many for the smaller Hubs and could mean undesirable encroachment into the open countryside and the Green Belt.

General allocations

- 5.6. In order to inform our understanding of the process, we have produced tables showing for each settlement its size, its status and housing guidelines under SAMDev, its allocations of housing and employment land under this Preferred Options process, and how it has been scored and ranked under the Council's new scoring system. One such resulting table, showing the towns and proposed Community Hubs, ranked in population order, is reproduced in Annex 4 as the last page of this document.
- 5.7. This shows that, based on the Council's own estimates of current settlement sizes³², the Council's proposals are to increase Shrewsbury by 26% over the 20-year plan period; to increase the 5 "Principal Centres" by 23% on average; and to increase the 11 "Key Centres" by 25% on average. The proposal is also to increase rural settlements (hubs or otherwise) by 7,875 houses (23% on average) without yet specifying where those houses would be distributed.
- 5.8. It is not set out, even within *Appendix 3: Settlement Strategies*, how the housing allocations for each settlement have been arrived at. Some are consistent with the Preferred Development Strategy as noted in paragraph 3.14 above, namely to provide more growth in the north and east of the County (Whitchurch, housing growth of 35%; Shifnal, housing growth of 47%). However, some of the proposed increases in housing do not fit with this concentration on the north and east (Ellesmere, 41%; Craven Arms, 41%).
- 5.9. The proposed allocations of employment land follow the mathematical formula of Appendix 1, Table 7. This assumes that the number of jobs is the same as the number of dwellings, that the average job requires 42.25 sq m, and that only 40% of an employment site is used for actual jobs. Some of these assumptions have been questioned, as above. Any changes made to the overall targets for housing or employment land must be reflected in their distribution amongst the settlements.
- 5.10. So too, any physical constraints on development should be reflected in the allocations. For instance, it may not be sensible for Church Stretton to be allocated housing resulting even in a 13% increase in its size when it is so heavily constrained by its unique position within the AONB.

³² As derived from Appendix 2, Table 9 of the Hierarchy of Settlements document

5.11. We consider, like Oswestry & District Civic Society do, that for sustainability reasons development should be concentrated away from rural villages even more than is proposed, and that its focus should be even more concentrated on towns.

Q6 *If you have any comments on any of the settlement strategies provided within Appendix 3 of the Consultation Document, please use this space to make them:*

- 6.1. Comments on particular individual settlements, by CPRE members living in or near them, are as follows. The settlements are listed in decreasing order of population size.

Strategic Centre

Shrewsbury

- 6.2. Whilst we endorse the policy of “Urban Focus” for any additional development, we have considerable misgivings about the effect on the character of the county town. Over recent years the town has grown far too quickly for the supporting infrastructure. This has resulted in traffic congestion aggravated by a multiplicity of new traffic islands controlled by lights. Public transport services within, and to and from the town have deteriorated significantly. The town has lost many specialist private shops which provided a unique character; these tend to have been replaced by charity shops and national chains. Parking restrictions and costs have made it difficult for people who wish to do their shopping within the town. New peripheral developments of both domestic housing and commercial property are robbing the town of its unique character.
- 6.3. The second Shrewsbury by-pass was completed in 1994 and predictably has added new areas for development and a temporary outer limit. The beneficial effect of the by-pass on traffic flows is already being eroded.
- 6.4. All of the above have been the consequences of the quest for rapid economic growth, which it is claimed, will improve living conditions for all. Clearly it does not always do so.
- 6.5. Unfortunately, what is seen to be the panacea for some of the above problems involves proposals such as a new North West Relief Road. The Council seems completely oblivious to the fact that the road, if constructed, will drive through one of the town’s last unspoilt areas of countryside enjoyed by residents and visitors alike.
- 6.6. As we have said elsewhere in this document Shrewsbury is losing the unique character that made it so special to residents and so attractive to visitors. Sadly the pursuit of unsustainable growth is turning the county town into just another typical Midland metropolitan area.

Principal Centres

Oswestry

- 6.7. Upgrades in Oswestry’s infrastructure are needed and should be properly integrated into development proposals, both for housing and for employment. The Cambrian Medical Centre is over-loaded. The Mile End roundabout and nearby stretches of the A5/A483 are over-busy now, so will not be able to cope with extra traffic from (1) the eastern Sustainable Urban Extension (outline application awaiting decision, because of highways issues) and (2) the Innovation Park.

- 6.8. The “sustainable” part of the title in the designation “SUE” is meant to convey that the SUE should make provision for the extra shops, schools, medical facilities etc required by large numbers of extra people. The current proposals for the Eastern SUE contain no such provisions. If Oswestry is to host a further 1,800 houses, as is proposed, there should be parallel proposals for the necessary extra supporting infrastructure.
- 6.9. Under the Hierarchy of Settlements proposals, the Oswestry Place Plan is set to host 11 Community Hubs, rather than the 6 Hubs designated under SAMDev. Residents of these settlements look to Oswestry to provide many of their requirements. This makes it all the more important that Oswestry’s infrastructure is upgraded.
- 6.10. Table 2 shows Oswestry to have 57Ha of committed and allocated employment land. The logic of 'balanced growth' therefore implies that Oswestry should have 5,400 more houses, rather than the proposed 1,800, which is plainly unrealistic. This points up the inconsistency of the County-wide policy of 'balanced growth' when applied to individual settlements.

Bridgnorth

- 6.11. There has already been recent expansion and proposed further development on the edge of Bridgnorth at Tasley, which is functionally part of Bridgnorth. The current proposal for 1,500 more houses is too high without a parallel huge investment in infrastructure.

Ludlow

- 6.12. There are existing allocated undeveloped brownfield sites. Policies should encourage building on previously allocated sites in preference to new allocations.

Key Centres

Church Stretton

- 6.13. Church Stretton is very constrained in its role as the only market town within the South Shropshire Hills AONB, which is a special and iconic landscape worthy of National Park status. Because of that physical constraint the town should not be required to take a share of development based on the “average for Shropshire”. Footnote 9 to para 14 of NPPF is intended to protect AONBs and to restrict development, whether for housing or for employment.
- 6.14. Church Stretton’s tourism-based economy needs support, but it should not be allocated any industrial employment land.

Craven Arms

- 6.15. We acknowledge that Craven Arms needs to expand in order to become more sustainable and suggest that it could take some of the allocation for Church Stretton.

Much Wenlock

- 6.16. Much Wenlock has particular distinctiveness and is in close proximity to, and affecting, the AONB, so development here should be limited.

Development in Rural Areas

Q7 Do you agree with the proposed 'Community Hubs' identified within Table 3 of the Consultation Document?

7.1. Our answer to Question 7 is "No".

7.2. At paragraph 6.4 of the consultation document Community Hubs are defined as:

Settlements which have a 'sufficient population' to maintain a range of services; facilities; and employment. In these settlements, appropriate sustainable development should contribute to the retention and enhancement of these existing services; facilities and employment. It should also support the provision of new housing to meet local needs; services; facilities; and employment opportunities

7.3. The majority (73%) of respondents responding to the Issues and Strategic Options consultation indicated that they were supportive of the Council's proposed approach. However, the actual question asked was "Do you agree with the approach and/or the methodology proposed to identify Community Hubs?" We interpret this to mean that respondents endorsed the general approach, but not necessarily the detail of the proposed scoring system.

7.4. We contend that settlements should be allowed to contest their proposed designation as Community Hubs beyond this stage of consultation. This is because the potential impact of designation will not be fully revealed until the next stage of consultation, and the publication of the detail of what allocations are likely to be made as a result of the "Call for Sites", and where development boundaries will be drawn.

7.5. At Annex 4 we reproduce our commentary on the *Hierarchy of Settlements* methodology, which we sent to all parishes hosting the proposed 40 Community Hubs. This contains our detailed comments on all aspects of the *Hierarchy of Settlements* document, which we also hereby submit as part of this consultation response.

7.6. In summary we contend that:

- i) The detail of the scoring system should be amended. We appreciate that the *Hierarchy of Settlements* document was adopted by Cabinet on 18 October 2017, but:
 - a) We contend that, contrary to the Council's stance, its detail was not necessarily endorsed by the public at the Issues and Strategic Options stage.
 - b) It contains errors of fact in the scores awarded. We believe that many of the communities involved will be reporting these.
 - c) It contains errors of principal in the scores awarded. We identify instances in our commentary at Annex 4, e.g. conflation of an infrequent library bus service with a full-time permanent library; the inequity of awarding villages with a rudimentary bus service the same number of points as Shrewsbury and market

towns which have much more extensive bus services; and the omission of the Orthopaedic Hospital from the scores.

- d) It has been changed since the Issues and Strategic Options stage, although we appreciate the Council's stance that this was in response to comments received; that in itself indicates that the detail was not fully endorsed during the previous consultation.
- ii) The designation of the 40 Community Hubs should be reconsidered, because:
- a) The drawing of an arbitrary line between Weston Rhyn/Preesgweene and Wistanstow, simply because there happens to be a three point gap between them, is not a properly objectively assessed method for separating out Community Hub status.
 - b) Many of the proposed 40 Community Hubs do not satisfy the Council's own definitions of what constitutes a Hub, as reproduced at paragraph 7.2 above. For instance, many of the proposed Community Hubs have been awarded no score for employment. The presence of employment opportunities is a pre-requisite for designation as a Community Hub.
 - c) Many of the proposed 40 Community Hubs do not have a good representation of the seven criteria deemed to be essential to everyday life.
 - d) It seems inequitable that a settlement as small as Chirbury (population 213) should be accorded the same Community Hub status as a settlement as large as Bayston Hill (population 5,156), which is itself larger than 8 out of 11 of the proposed Key Centres.

Q8 Do you support the proposed policy for managing development in 'Community Hubs'?

- 8.1. Our answer to Question 8 is "Yes".
- 8.2. The criteria proposed in the previous consultation are largely reflected in the new criteria. We particularly endorse the Council's proposal to retain development boundaries for Community Hubs, because that will provide some certainty as to where development should take place.
- 8.3. There should however be a specific policy giving protection to the Green Belt around Hubs within the Green Belt.

Q9 Do you think any additional 'Community Clusters' to those identified in Table 4 should be formed? Or any of the existing 'Community Clusters' identified in Table 4 removed?

- **Yes - added**
- **Yes - removed**
- **No**
- **Don't know/ no opinion**

Please use the space to make any comments on Community Cluster(s). Please also use this space to specify the Community Cluster(s) you feel should be added or removed and any community support you are aware of for this proposal:

9.1. Our answer to Question 9 is "Yes", we think that some settlements within the proposed list of Community Clusters should be removed.

9.2. At paragraph 6.4 of the consultation document Community Clusters are defined as:

Smaller settlements which 'opt in' to receive development and offer or aspire to offer a range of services; facilities; and employment that together help to create contributing to a sustainable community. In these settlements, appropriate sustainable development should contribute to the retention and enhancement of existing services; facilities; and employment. It should also help to support the provision of new housing to meet local needs; services; facilities; and employment opportunities where possible.

To 'opt in', Parish Council(s)/Parish Meeting(s) as the elected representatives of the community should propose the settlements to be designated as a Community Cluster to Shropshire Council.

9.3. The definition is essentially the same as that for Community Hubs, with the exception that it is "*smaller settlements . . . together . . . which 'opt in' to . . . offer or aspire to offer a range of services*" etc.

9.4. The list of proposed Clusters on pages 30-31 (Table 4) of the consultation document is simply the previous list of existing Clusters, having removed those settlements that have now, by virtue of the scoring system, been designated as Community Hubs.

9.5. The list does, anomalously, include a few Clusters of only one settlement. These should be removed from the list. If they have been "scored-out" from designation as Community Hubs, then as stand-alone settlements they are not acting "*together*" with other settlements and cannot be providing a range of services etc equivalent to those of a Community Hub.

9.6. It would also seem sensible to remove from the list all the smaller hamlets that have been "screened-out" within the lists on pages 23 - 33 of the *Hierarchy of Settlements* document.

Opt-in or opt-out?

- 9.7. The *Hierarchy of Settlements* document does now say that all settlements not classified as Hubs (i.e. all the “*Other Rural Settlements*” on the scoring tables) will be classified as Countryside, but may wish to consider ‘opting-in’ to Community Cluster status to maintain or enhance sustainability³³.
- 9.8. We consider that the wording of Question 9 (its final sentence) favours a passive “opt-out” from the Council’s proposed list of Clusters, rather than an active “opt-in”.
- 9.9. If Parish Council(s)/Parish Meeting(s) do not submit a consultation response (rather than actively letting Shropshire Council know that they wish to “opt-in”), then settlements in that Parish listed as “*Other Rural Settlements*” on the scoring tables, should remain classified as Countryside. Such Parishes, by doing nothing, will therefore have passively “opted-out”.
- 9.10. If they do respond to Question 9, but do not specifically “opt-in” they will equally have “opted-out”.
- 9.11. It is only if Parishes do actively say that they wish to “opt-in” that their settlements should be included in the list of Community Clusters. On that basis, we envisage that the list of proposed Community Clusters on pages 30-31 (Table 4) will substantially change.
- 9.12. We suspect however that Shropshire Council expects its proposed list of Community Clusters to remain unchanged unless it hears from Parishes that they do not wish their settlements to be included on the list. If that is the case, it is not consistent with the wording reproduced in the last sentence of paragraph 9.2 above, nor with the wording of Question 9 itself.

³³ Table 2 on page 4 and Table 6 on page 14

Q10 Do you support the proposed policy for managing development in 'Community Clusters'?

- 10.1. Our answer to Question 10 is "Yes", on the whole.
- 10.2. The criteria proposed in the previous consultation are largely reflected in the new criteria.
- 10.3. We welcome the revised definition of infill, which now refers to built development on two sides, rather than on three sides as was previously proposed.
- 10.4. However, we would prefer that development boundaries be retained, because that will provide greater certainty as to where development should take place.
- 10.5. There should also be a specific policy giving protection to the Green Belt around any Community Clusters within the Green Belt.

Q11 Do you support the proposed approaches to managing residential and non-residential development in the wider Countryside?

11.1. Our answer to Question 10 is “Yes”, subject to continued protection for the Green Belt.

11.2. The key proposal for managing residential development in the wider countryside is given as:

Continue to strictly control new market housing in the countryside whilst supporting new affordable housing for local needs and small scale employment opportunities in appropriate locations.

11.3. The policies for managing non-residential development in the wider countryside are given as:

To promote a prosperous rural economy, the current policy approach to non-residential development in the Countryside outside Community Hubs and Community Clusters will continue. Therefore local policy will supplement national policy in responding to issues such as:

- *Allowing small scale, new employment development to diversify the rural economy.*
- *Allowing rural businesses the opportunity to grow and diversify their enterprise to include the conversion / replacement of suitably located rural buildings.*
- *Ensuring that any development within the countryside is of an appropriate size and scale to its setting and that sufficient infrastructure is available.*
- *Supporting sustainable rural tourism.*

11.4. We support development of bona-fide agriculture in the countryside and we note the mention above of small scale employment/development opportunities. We think it would be helpful if the Council could include policies to provide greater protection against controversial large-scale industrial type food production warehouses in the countryside, for instance large scale poultry units, with special mention of the statutory protections afforded by footnote 9 to para 14 of NPPF to the AONB and the Green Belt.

Q12 Please use the space below to make any further comments on this Consultation:

Green Belt

- 12.1. We note that the consultation questionnaire contains no question about the Green Belt, despite there being (1) a separate two-page section within the consultation document, headed "*Green Belt Review*" (2) the publication on the Council's website, at the same time as the other consultation papers, of a 318-page Green Belt Assessment, and (3) the statement at paragraph 5.7 of the consultation document that "*this assessment will therefore assist the further preparation of the Preferred Option to deliver a sustainable development strategy for Shropshire*".
- 12.2. We consider this to be a significant omission.
- 12.3. Paragraph 5.9 of the consultation document states that "*this authority therefore recognises the need to undertake a Green Belt Review to assess these findings*". We assume that a consultation exercise will take place once this Green Belt Review is published, and that no development in the Green Belt land will be contemplated until such a Review has taken place.
- 12.4. It would be helpful if such a consultation were conducted as a separate exercise, rather than being subsumed within another consultation.
- 12.5. However, if the Green Belt should be examined as a constraint on development (as set out in the NPPG), something which is likely to be the case where additional development is proposed in the east of the county, a Green Belt Review after the Preferred Option for housing numbers has been set (as is proposed in this consultation) cannot influence the numbers and so does not fulfil the requirement of Government policy.

Development at strategic sites

- 12.6. The summary of the Preferred Development Strategy on page 4 of the consultation document mentions development at strategic sites such as Ironbridge Power Station and Clive Barracks, and potential new Garden Village settlements in strategic locations.
- 12.7. We understand that no firm proposals have yet been formulated for such strategic sites. In view of what we have said about the ambitious targets for housing and employment we would hope that development on these sites would not lead to any housing or employment development beyond the existing targets within these published Preferred Options.
- 12.8. In the case of Ironbridge Power Station we hope that development there might contribute to the ambitious targets set by Telford & Wrekin Council.
- 12.9. In the case of Clive Barracks, we hope that development there might contribute to the extra targets set for the north of the county.
- 12.10. In the case of garden villages, we hope that any such developments would contribute to existing targets set for rural areas, and that they would not constitute any encroachment into the Green Belt, or in or near the AONB.

Gypsy & Traveller Accommodation, Mineral Sites, and Waste development

12.11. We note what is said under these headings on page 34 and have no specific comments, although we note there were no consultation questions about these topics.

Wind Energy

12.12. We note that the Council will carry out a County wide assessment to identify the criteria for the selection of areas where wind energy development might be considered. We assume the results of that will be published for consultation before the next stage of the Local Plan Review process.

12.13. We would ask the Council to take note of the shambles that surrounded a similar exercise over the border in Powys, undertaken by Aecom for Powys County Council and used as the basis for PCC's LDP Renewable Energy Policy RE1. The original report identified Local Search Areas suitable for wind energy development, in addition to the TAN 8 areas. That exercise then had to be re-visited, resulting in the effective removal of all such LSAs for wind energy, largely on landscape grounds. That has contributed to the delays in satisfying the Inspector of the soundness of the PCC Plan.

12.14. We understand that current Government policy favours off-shore wind energy development, rather than on-shore wind energy.

12.15. On the subject of on-shore wind energy, officers may also be aware that the decision on the re-determination of the Mid Wales Windfarms Conjoined Public Inquiry, which was expected by 21 December, will not now be issued until the New Year. That decision may yet trigger National Grid to revive their Mid Wales Connection plans for a pylon line across north Shropshire.

12.16. We would therefore ask that any County wide assessment to identify the criteria for the selection of areas where wind energy development might be considered takes into account the effects of any resulting necessary grid connections.

12.17. We would also urge the Council to make absolutely clear that where an area meets any given criteria, this is not of itself evidence that wind energy is suitable on sites in those areas and that any proposals will need to be rigorously justified, taking account of the high landscape value in much of the County.

Sustainability Appraisal

12.18. We again state that the Oswestry and District Civic Society has reappraised the Sustainability Appraisal through a critical review of it and has concluded that overall the SA gives a negative assessment rather than the positive one claimed by Shropshire Council. The conclusion is that the Preferred Options Strategy does not represent sustainable development.

Summary

- 13.1. In this section we attempt to summarise our previous comments, and to bring out key points. We continue to use a numbering system that reflects the consultation question numbers, and the above section numbering.
- 13.2. General concerns
- A. Out of date and incomplete information
 - i) An up-to-date Strategic Land Availability Assessment (SLAA) and Strategic Housing Market Assessment (SHMA) are needed in order to be able to properly assess the impact of the housing preferred option.
 - B. The lack of information relating to types of housing
 - i) There should be information on types of housing, particularly housing for older people, in order to form a judgment on amounts of housing.
 - C. The Sustainability Appraisal
 - i) We are not convinced that the SA provides a sound enough rationale for the assessment of the options. This view is corroborated by the work of the Oswestry & District Civic Society.
 - D. The inter-relationship of Options
 - i) The Preferred Options for high housing numbers and high levels of employment land will affect the availability and quality of sites, which may become restrictive factors.
 - E. The future economy of the County
 - i) We continue to be sceptical about the possible spin-off benefits to Shropshire of development areas outside its borders. Such areas may compete against Shropshire, rather than benefiting it.
 - ii) Our view is that a prosperous future for Shropshire will probably rely on a targeted approach to higher productivity growth, which benefits from Shropshire's attractiveness, along with support for the rural and environmental industries which the area is best suited to attract.
 - F. Consultation
 - i) The Council has not been sufficiently open about how it has weighed the factors which allowed it to decide to go against the majority view expressed in the previous consultation.
 - ii) The overlap of the consultations on Issues and Strategic Options and the Economic Growth Strategy has enabled the Council to introduce the new evidence of the EGS to the Local Plan Review process in a way that is not completely open.
 - G. Hidden motivation
 - i) The Council has not been wholly open about a number of possible factors motivating the strategy behind the Preferred Options, chief of which is the understandable desire, in these straitened times, to generate income for the Council.

- ii) The Council has adopted inconsistent stances about (1) the 5-year housing land supply, (2) affordable housing, (3) competition with neighbours and (4) the over-65 population.

13.3. Housing requirement

- i) The genuine need should be based on the demographic need for 18,000 new houses in the plan period with only minor adjustments where genuinely required. All houses in excess of that can be thought of as aspiration and ambition, or the satisfying of demand, rather than genuine need. That fact should be made plain.
- ii) Because the employment land requirement has been wrongly calculated, there is no “balance” between the housing requirement and the employment land requirement.
- iii) The higher than necessary housing requirement jeopardises the proving of a 5-year housing land supply in the future in a way that might well prove to be significant.
- iv) The high targets are not sustainable in the long term, particularly in the sense of pursuing carbon reduction.

13.4. Employment land requirement

- i) The figure of 288 Ha for the employment land requirement has been wrongly calculated, and is therefore unsound. Our assessment puts it as low as 118 Ha, but more detail is required on land which might be used for housing, and on the quality of land available. Accordingly there is no “balance” between the Preferred Options for the housing requirement and the employment land requirement. The housing land requirement should be reduced accordingly.
- ii) The supporting IPPR North reports and the Oxford Economics Productivity Growth Forecast spreadsheet are highly questionable as a sound basis for the Economic Strategy.
- iii) The Economic Growth Strategy has not been assessed for sustainability. Like the housing strategy, it is unlikely to help to pursue carbon reduction.

13.5. Spatial distribution

- i) A yet greater concentration towards the towns would be more sustainable in terms of helping to pursue carbon reduction. We appreciate that this is problematical in such a rural county as Shropshire.
- ii) The criteria by which allocations have been made to each town should be made plain.
- iii) It is not possible to have a properly informed view on the appropriateness of the proposed rural allocation of 7,875 houses without first having some idea of possible detailed allocations and possible development boundaries.

13.6. Settlement strategies

- i) Necessary infrastructure should be provided as a priority.
- ii) Particular constraints of particular settlements should over-ride a one-size-fits all, County-wide, policy.

13.7. Community Hubs - designation

- i) The Council's scoring system to identify Community Hubs needs to be refined.
- ii) The proposed list of Community Hubs includes settlements that do not satisfy the definition of what a Hub should provide.
- iii) Some of the designated settlements are surely too small to warrant Community Hub status being imposed on them.

13.8. Community Hubs - policy

- i) The policy should include protection for the Green Belt

13.9. Community Clusters - designation

- i) Some of the listed hamlets are too small even to be part of a Community Cluster.
- ii) Our expectation is that many identified settlements will not actively "opt-in" to Community Cluster status, but may be awarded Community Cluster status because they have not "opted-out".

13.10. Community Clusters - policy

- i) We would prefer that development boundaries be retained, because that will provide greater certainty as to where development should take place.
- ii) Again, the policy should include protection for the Green Belt.

13.11. Open Countryside policy

- i) Again, the policy should include continued protection for the Green Belt.
- ii) It would be helpful to have specific policies giving protection against industrial-scale development in the countryside, particularly in or near the AONB and the Green Belt.

13.12. Other matters

- i) It would be helpful if any consultation on the promised Green Belt Review were conducted as a separate exercise, rather than being subsumed within another consultation.
- ii) Development at any strategic sites should be within the existing Preferred Options targets.
- iii) We endorse Oswestry & District Civic Society's professionally produced opinion that the Sustainability Appraisal gives a negative assessment rather than the positive one claimed by Shropshire Council. The conclusion is that the Preferred Options Strategy does not represent sustainable development.

13.13. The overall conclusion is that some of the concerns raised above call into question the soundness of the Preferred Options offered for consultation.

CPRE Shropshire

21 December 2017

Communications about the consultation process

Questions put to Shropshire Council Cabinet Meeting of 18 October 2017 on behalf of CPRE Shropshire

Shropshire Council response published on the morning of 18 October 2017

Question

Is Cabinet aware that major elements of the Preferred Options now placed before them ignore the clear preferences of the immediately preceding round of consultation, as expressed by those participating in that consultation; and therefore that by endorsing these Preferred Options Cabinet will be wilfully ignoring the democratically expressed views of its electorate? Why have a consultation and then ignore the results of that consultation?

Principal Response

The consultation on Issues and Strategic Options was particularly valuable as an early step in seeking views from across a range of communities, businesses, organisations and individuals on Shropshire's future growth up to 2036. Consultations like this are an important part in plan making, both in terms of gauging 'headline' preferences, but also to understand the reasons behind these preferences. However, responses to consultations do not stand alone, and a range of other material factors will always influence the direction of a Local Plan and its emerging strategic priorities.

In producing the draft Preferred Options for the Scale and Distribution of Development, Shropshire Council officers have considered the consultation responses received during previous stages of consultation, both in terms of the proportion of respondents that expressed preference for a specific option and the specific comments made when identifying this preference.

The document referred to by Mr Green in his comments is the *Issues and Strategic Options Consultation Response Summary* published in July 2017. Looking specifically at housing requirement, this document provides a broad overview of the responses to each option but does not provide any 'weighting' to these comments, as implied by Mr Green. The consultation responses themselves have subsequently been 'weighed' against other material issues and emerging evidence in arriving at the housing requirement Preferred Option now presented for further consultation.

In summary, the other material issues Shropshire Council officers have considered include:

- The evidence base produced to support the Local Plan Review;
- The need to balance housing and employment growth;
- Government objectives to deliver the right housing in the right places in order to address the national housing crisis;
- The objectives of the Shropshire Economic Growth Strategy;
- Strategic investment opportunities identified within Shropshire;
- The role of Shropshire within the wider region, and the opportunity to help support the delivery of the objectives of the West Midlands Combined Authority; and
- Aspirations to deliver more family and affordable housing, increase economic growth and productivity, deliver important infrastructure; increase education opportunities, and upskill communities.

The Preferred Options for the Scale and Distribution of Development are considered to represent a sustainable strategy for Shropshire and will support the long term sustainability of the County. The Preferred Option is proposed for consultation to enable the different elements of the option and the supporting evidence to be considered and commented upon. This consultation will invite partners, stakeholders and the public to give their views on the Preferred Option as the potential strategy for the Local Plan Review.

Communications about the consultation process

CPRE response

The above *Principal Response* appears to have been prepared by Liam Cowden, Senior Policy Officer for Shropshire Council.

In summary, he reports that responses to consultations do not stand alone, but that headline preferences expressed by a proportion of respondents are weighed both against specific comments made, and against existing and emerging evidence.

We had hoped that any “weighting” adopted (as referred to in the short 3-page paper sent to each Cabinet member on 15 October) would be overtly objective. The Council’s “*weighing in the balance*” of responses, as outlined by Mr Cowden, is not objective, nor are the material elements of the balancing exercise clearly set out anywhere in any of the documents. The exercise appears to have been carried out in private, which is one reason why, from the public’s perspective, it appears that the Council has flagrantly ignored their expressed preferences.

Turning now to Mr Cowden’s list of other material issues considered, and taking each in turn:

- *The evidence base produced to support the Local Plan Review;*
At the I&O stage this consisted solely of the FOAHN of July 2016 (according to the Council’s website). That gave a “need” figure of 25,178 dwellings, not the 28,750 within *Preferred Options*. At the Preferred Options stage the evidence base has been augmented only by the updated FOAHN (maximum 25,400 dwellings) and two papers on the Green Belt.
- *The need to balance housing and employment growth;*
At the I&O stage housing was considered to be sufficient to balance extra employment of 9,300 jobs, according to Oxford Economics. It was only after the IPPR North report of November 2016 (i.e. well before the I&O consultation was launched, but not mentioned within it) and the launch of the Economic Growth Strategy that 14,900 new jobs are now considered necessary.
- *Government objectives to deliver the right housing in the right places in order to address the national housing crisis;*
As reported in the updated FOAHN of October 2017, the Government’s assessment of Shropshire Council’s housing “need” is only 25,400 houses, not 28,750. That figure, and the controversial methodology behind it, is still subject to consultation. The Council is therefore not obliged to accept the 25,400 figure, and is certainly not obliged to exceed it.
- *The objectives of the Shropshire Economic Growth Strategy;*
It is this EGS, newly produced whilst the I&O consultation was still in progress, that is the real driver of the high housing growth strategy.
- *Strategic investment opportunities identified within Shropshire;*
These were surely already known at the I&O stage and are not new material issues
- *The role of Shropshire within the wider region, and the opportunity to help support the delivery of the objectives of the West Midlands Combined Authority;*
Again, these were surely already known at the I&O stage and are not new material issues. Is Shropshire taking any of the housing needs of the West Midlands?
- *Aspirations to deliver more family and affordable housing, increase economic growth and productivity, deliver important infrastructure; increase education opportunities, and upskill communities.*

Communications about the consultation process

It seems perverse to build larger amounts of market housing in order to secure more affordable housing and infrastructure. Why not just build the affordable houses needed?

Mr Cowden concludes by asserting that the *Preferred Options* are sustainable. Our follow-up statement and question for Cabinet on 18 October argued, amongst other things, that persistent growth is not sustainable in the long term (in the everyday sense of the word *sustainable*, rather than its definition for planning purposes).

Supplementary question tabled at Cabinet Meeting of 18 October 2017

Following my lead-in, the actual question put to Cabinet was:

Do you as a Cabinet really believe that persistent growth is the way that the Council should be going, as set out in the Preferred Options documents tabled before you?

This was in the context that:

- Gemma Davies appears to assert that the Economic Growth Strategy takes precedence over the Local Plan Review (see her response of 17 October included as [the 4th page of this Annex 1].
- Is it realistic to think that *Shropshire can be a world leading rural economy by 2030* when it is now about 30th out of 40 English Counties in the economic league table?
- Is Shropshire Council placing enough emphasis on promoting mitigation and adaptation to climate change, when it is acknowledged that no relevant assessment was carried out of the Economic Growth Strategy's potential effects on climate change?

Robert Macey's response at the Cabinet Meeting (albeit without prior warning of the substance of the supplementary statement/question) was that (and the video-recording assists in this matter) :

- The Council's licensing procedures and air quality measures are addressing climate change issues
- The growth proposed is not infinite and the plans will be independently examined by a Government Inspector, so the Council's stance will be tested then (n.b. our eventual question was about *persistent* growth; persistent growth has at some stage to become a steady state to avoid it becoming infinite growth).
- Most concerns raised in the original statement/question had been addressed

The nub of our argument continues to be that:

- Numbers of new houses (28,750) proposed in *Preferred Options* are well in excess of any genuine need, are aspirational, and are against public opinion expressed in the I&O consultation
- Those numbers are driven by the over-ambitious Economic Growth Strategy, which was launched during the I&O consultation with "evidence" not previously divulged.
- A much greater proportion of affordable housing is needed, which will not be produced by the *Preferred Options*, with its general drive for market growth.
- The persistent growth which Shropshire Council continues to favour is not sustainable in the long term. A "smarter" rather than a "bigger" approach (as favoured by public opinion expressed in the I&O consultation) is what is needed, along the road to what ultimately must become a steady state, rather than persistent growth.

Charles Green

On behalf of CPRE Shropshire

25 October 2017

Communications about the consultation process

Email response of 17 October 2017 from Gemma Davies, Head of Economic Growth, to two concerns in email of 14 September 2017 from Charles Green, and (in red italics) his responses of 10 November 2017, in an email with a request for a copy of the definitive IPPR North report

1. *The consultation was launched before the end of the Local Plan Partial Review consultation, and with an additional evidence base, but seemed to pre-empt its results long before they could possibly be known. For instance (1) it quoted as gospel, a housing target of 1,375 new homes a year, whereas that target is subject to review in the Local Plan Partial Review, and (2) it overtly stated that "a step change [is] needed in Shropshire's economic productivity" whereas, again, that was subject to consultation in the Local Plan Partial Review.*
 - The existing (adopted) Local Plan remains in force until a new Plan is adopted. This is likely to be in 2020. The existing plan indicates that an average of 1,375 homes per year will be needed to deliver the housing guideline in the current local plan.

I note that, although the slides from the launch events annotate this 1,375 figure to show that it is the Current Local Plan figure, the final EGS document itself does not do so.
 - These figures are likely to change as part of the Local Plan Review (and I am aware you have seen the draft Preferred Options for the Scale and Distribution of Development published on the website)

You indicated to me verbally at the launch event on 2 October that the Preferred Options would include the "Productivity Growth" option for economic development. It does indeed do so, but the "Productivity Growth" option offered, based on the Economic Growth Strategy, is a completely different offer to the one, also described as "Productivity Growth", in the Issues and Options. At that stage "Productivity Growth" was characterised as creating more 'higher value' jobs whilst potentially setting a lower employment land requirement and a lower overall provision of new jobs. The Preferred Option for "Productivity Growth" is for considerably higher employment land requirements and for a considerably higher overall provision of new jobs.
 - The Local Plan Review process is designed to capture and integrate existing and emerging corporate strategies, including the Economic Growth Strategy which provides the direction on economic aspirations and objectives. The Economic Growth Strategy has set out such a key step change that is was correct for it to take the lead and set targets for a broad range of objectives both for the economy directly and for supporting development facilities and services required by our communities.

I note that you acknowledge that the Economic Growth Strategy has come along after the Local Plan Review consultation was launched, and has taken precedence. Our concern is that the whole EGS is built on sand, namely the IPPR North report.
 - The Local Plan is therefore not the principal document in this context, but provided an opportunity to test evidence from the Economic Growth Strategy with stakeholders in order to determine the spatial and land use implications of these broad economic aims and objectives. The Local Plan Review issues and options consultation was intended to generate an open and wide ranging debate with the potential for both the emerging Local Plan Review and Economic Growth Strategy to inform each other where necessary.

It is difficult to see how the Local Plan Review Issues and Options consultation could generate a debate on the Economic Growth Strategy when the latter's consultation on its first draft was launched during the former's consultation period, but towards its end when many people had already responded, before they could possibly be aware of the EGS and its thrust.
 - We are committed to a demanding programme for the Local Plan Review in our Local Development Scheme agreed with and required by DCLG and waiting for the Economic Growth Strategy to progress further was not an option. In these circumstances it was therefore entirely appropriate to use the best available evidence from the emerging Economic Growth Strategy as part of the Local Plan Review consultation earlier in the year.

Communications about the consultation process

This response initially puzzled me because Table 2 of the Local Development Scheme implied that the consultation on the Preferred Options would not start until January 2018. You therefore appeared to be 3 months ahead of schedule. But Adrian Cooper explained at a meeting we had with Ian Kilby and him yesterday afternoon (9 November) that the Preferred Options is being split into two consultations. The current consultation is on Scale and Distribution. Preferred Options for actual allocations, based on the Call for Sites, is now what is scheduled for January. The current consultation does not however describe any preferred distribution, amongst the proposed 40 Hubs or 166 Other Rural Settlements, of the proposed 7,875 houses for rural areas.

2. *The consultation was inadequately publicised, including on the Council's own website. The fact that out of over 4,000 contacts invited to comment on the consultation only 68 did so is an indication of the inadequate nature of the consultation.*

- I'm sorry you feel the consultation was inadequately publicised. Our engagement on the strategy included a mix of attendance at meetings (20 of them), direct emails to external stakeholders and promotion throughout business networks and those registered on gov delivery. All promotion carried out via email or gov delivery contained a link to the Shropshire Council consultation page so over 4,000 would have received this link. Whilst as you say there were 'only 68' written responses, a number of these were from organisations representing many more individual people such as your own response for example.

You acknowledge that the EGS takes the lead over (or within) the Local Plan Review process. Yet (as we noted at paragraph 1.15 of our response to the EGS consultation), even on the last day of this EGS consultation there was no clear reference to it on the Planning Policy page of the Council's website. Instead, that page continued to headline the Local Plan Partial Review consultation, as though it were the current ongoing consultation, even though it had closed over a month previously. Incidentally, the recent revamp of the Council's website has made it harder to locate documents.

Partial transcript of Cllr Robert Macey's remarks for Agenda Item 9 of Cabinet meeting on 18 October 2018

Derived from 58:21 to 1:00:15 on the video recording of the meeting³⁴

So, let me start by addressing the scale of the development that's proposed.

The Government recently set down the need and that's one of them at 25,400 houses so we have no option but to deliver these homes. That is the Government figures that we have to work to. The paper sets out a target slightly above this in order that we can meet the aspirations of our County and at the same time address some of the challenges which currently exist. And these challenges won't be new to people, namely:

- The gap in the skills required to attract and retain certain employers*
- Constraints on the availability of our employment land in certain areas*
- The increasing competition to attract employment from both our neighbours and further afield*
- We also know about Shropshire's ageing population. The latest ONS population projections estimate Shropshire's 65 and over population will grow by 56%, making up 33% of our entire population by 2036, which is well above the national average.*

The challenge for this Council is how it provides the services and infrastructure statutorily required in the face of these challenges whilst also balancing the books, as we've heard.

The other factor to take into account is that in Table 1 of point 2.13 of the report is that we're not starting from zero to achieve this target. We already have 18,000 houses identified within the current plan, leaving us with a requirement for an additional 10,000 houses in this new plan period which runs for an extended 10 years.

Therefore the figures outlined in the paper are proposed to enable Shropshire to put the right development in the right places to enable the County to be on the front foot with a clear plan that delivers Shropshire that is a great place to live, work, study and enjoy both now and well into the future.

³⁴ <http://shropshire.gov.uk/news/2017/10/cabinet-18-october-2017/>

CPRE review of IPPR North reports

“Building an economic vision for Shropshire”, a research report by IPPR North for Shropshire Council dated November 2016, and a summary report dated February 2017**A review by CPRE Shropshire, December 2017****Background**

1. The IPPR North reports are put forward as the main evidence supporting Shropshire Council’s Economic Growth Strategy for Shropshire 2017-2021 (EGS). This EGS was launched for a 6-week consultation in March 2017. Page 3 of the EGS refers to the IPPR North report dated February 2017. That is a Summary report (as explained by Gemma Davies, Head of Economic Growth, in an e-mail dated 24 November 2017), available on the [Invest in Shropshire website](#) only from 24 November 2017. Also available on the Invest in Shropshire website from that date is the IPPR North Research Report, a more detailed report on which the Summary Report is based. On the Shropshire Council and Invest in Shropshire websites two earlier versions of that Research report are also available. These various versions are summarised in Annex 1. The versions we review here are those linked from the foot of the home page of the Invest in Shropshire website.
2. The Summary report repeats detail from the longer Research report, namely its first two pages (with a changed final 2-line paragraph), and section 4.2.1 to 4.2.4. It then adds a summary page (not included in the Research report), which lists the 13 recommendations referred to on page 3 of the Economic Growth Strategy. We repeat that this Summary report, although referred to in the Economic Growth Strategy published in July 2017, was not available on the Council’s websites until 24 November 2017.
3. Both reports state at their outset that:

IPPR North was commissioned by Shropshire Council and the University of Chester to develop a new economic vision for Shropshire’s economy in the future. Our study has involved some new economic analysis; it has considered some of the existing strategies of Shropshire Council and the Marches Local Enterprise Partnership; and we have held a series of roundtables with key stakeholders from around the county.
4. At the foot of the same page both reports say “Further details of our analysis are available in a separate report”. It has been clarified (by Gemma Davies, Head of Economic Growth, in an e-mail dated 3 December 2017) that there are in fact no further reports; this reference is because the Summary report is the first section of the Research report - it refers to the Research report itself. The Research report does also say at the foot of page 4 “Details of this vision and the subsequent recommendations are set out in a separate report. This report sets out the background analysis that underpins this vision”. This presumably refers to the Summary report.
5. The IPPR North reports were not mentioned in the papers for the 8-week consultation on the Local Plan Partial Review (LPPR), which was still underway when the EGS consultation

CPRE review of IPPR North reports

was launched. This was despite the fact that the IPPR North Research report had presumably been available since November 2016, and the fact that the LPPR contained a section on Economic Growth.

Unprofessional production

6. The IPPR North Research report (as originally downloadable from the Shropshire Council website³⁵) was unfortunately incomplete, in that some of its figures did not download properly (e.g. figures 8 and 9). A later version, marked as FINAL, has subsequently been downloaded, which does reproduce figures 8 and 9³⁶. The third version of the Research report, downloadable from the Invest in Shropshire website, has a revised index, revised page numbering, and correction of at least one proof-reading error. Of more concern however, is that the report is still riddled with proof-reading errors (a few of them carried over to the Summary report), including inaccuracies in some of its tables and figures, which have in at least one instance led to incorrect conclusions. This gives the impression that the report has been sloppily and negligently compiled, and is not the work of a fully professional organisation. We have identified over 50 such errors, as itemised in Annex 2 below.

Category errors

7. Many of its conclusions on economic measures are of the type "Shropshire's xxx is less than the UK average". It makes these statements without any attempt to show the statistical significance of such a deviation from the UK average. It is of course the nature of a set of data giving rise to an average that almost every member of that set will differ from that actual average. The true significance of such a difference is not the physical amount of the difference (which is all that the IPPR North report focuses on) but how that difference relates to the overall spread of differences within the complete data set. The IPPR North report gives no indication whatsoever of such significance.
8. Furthermore, the implication that if "Shropshire's xxx is less than the UK average" then Shropshire should strive to make its "xxx" greater than the UK average, or even top of the league, is a nonsense. That implies a perpetual game of leap-frog between Local Authorities, in a never-ending game of escalation. That is another reason why it is important to have an appreciation of the significance, and reasons for, any deviation of Shropshire's "xxx" from the UK, or English, average.
9. It might have been more instructive, instead of comparing Shropshire's figures with the UK average, to have compared them with the average for other shire counties.

Independent review?

10. The factual errors and category errors identified in paragraphs 6 and 7 above lead to two questions:

³⁵ <https://shropshire.gov.uk/media/7564/shropshire-economic-analysis-report-ippr.pdf>

³⁶ <http://www.investinshropshire.co.uk/wp-content/uploads/2017/03/Shropshire-Economic-Analysis-Report-FINAL-170308.pdf>

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a) Has the IPPR North report been subject to any internal review process, or other review process, by peer organisations, other economists etc?

b) Has Shropshire Council noticed these errors?

11. Without such critical review procedures, the validity of the IPPR North report must surely be questionable.

Unsupported conclusions

12. The bulk of the Research report is concerned with the analysis of statistical data. It might be thought that this analysis would be the basis of the evidence base that this report purports to be. However, section 4, the actual stage of *“Developing an economic vision for Shropshire”* begins with the statement *“During the discussion groups, participants were asked to outline their views on what a future vision for Shropshire might look like”*.

13. It transpires that the report’s conclusions are based not on the analysis of data, but rather on what emerged from discussion groups. Appendix 1 to the IPPR North report lists a number of round-table discussions, several of which were internal to Shropshire Council itself. It is not revealed who was at those discussions, how often they occurred, whether there was an agenda, or whether a member of IPPR North was present at those discussions to present the analysis of the data contained in the bulk of their report. It has been confirmed that they were consultations that were not open to the public.

14. It therefore appears that the conclusions and thrust of the IPPR North report have emerged from discussions amongst un-named individuals around a table or tables, rather than from evidence. Although the Research report does contain evidence (although as noted above, that itself contains gross errors), such evidence has apparently not itself been used in supporting the conclusions of anonymous individuals around a table or tables.

15. The conclusions from section 4 of the Research report have been carried over to the Summary report, and so the Summary report also bears no apparent relationship to the evidence in Sections 2 and 3 of the Research report.

16. The opening statement of the IPPR North report of November 2016 is *“By 2030 Shropshire can be a world-leading rural economy”*. This hyperbolic statement is nowhere supported in the body of the reports either by the evidence, or by the round-table discussions, or by the 13 recommendations at the close of the Summary report.

Sustainability?

17. Shropshire Council’s Economic Growth Strategy (as finalised) was launched to the business community at an event in the Walker Theatre (at Theatre Severn) in Shrewsbury on 26 October 2017. At that event, Ed Cox, the Director of IPPR North, admitted with some embarrassment that no calculations whatsoever had been done to assess the carbon balance of the proposals within the IPPR North report or the Economic Growth Strategy.

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18. The Preferred Options report has at least been supported by a Sustainability Appraisal. However, the Oswestry and District Civic Society has reappraised this SA through a critical review of it and has concluded that overall the SA gives a negative assessment rather than the positive one claimed by Shropshire Council. The conclusion is that the Preferred Options Strategy does not represent sustainable development. This is also supported by the Council's admission that "*The SA is not an evidence based exercise, it is a matter of professional judgement, based on the consideration of the three pillars of sustainability social, environmental and economic*".
19. The Economic Growth Strategy has not been supported by any such Sustainability Appraisal even a flawed one. Without such an Appraisal, the conclusion must be that the Economic Growth Strategy, as underpinned by the IPPR North report, does not represent sustainable development.

Conclusions

20. We conclude that:
 - i) The IPPR North reports have not been produced to the high standards normally expected of a competent professional firm
 - ii) The IPPR North research report lists metrics where Shropshire's figures differ from the UK average, but it gives no indication or comment on whether those differences are significant. It might have been more instructive, instead of comparing Shropshire's figures with the UK average, to have compared them with the average for other shire counties.
 - iii) The conclusions and thrust of the IPPR North reports have emerged from discussions amongst un-named individuals around a table or tables, rather than from evidence.
 - iv) The Economic Growth Strategy, as underpinned by the IPPR North report, does not represent sustainable development.

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Annex 1

Versions of IPPR North reports

Title on title page	Date on title page	Author	Date and time pdf created	Website reference	Identifying characteristics
A research report by IPPR North	November 2016	Sarah Longlands	13/03/2017 09:22:29	https://shropshire.gov.uk/media/7564/shropshire-economic-analysis-report-ippr.pdf	Error message in index: Tables 8 and 9 not included
A research report by IPPR North	November 2016	Sarah Longlands	09/03/2017 09:46:53	http://www.investinshropshire.co.uk/wp-content/uploads/2017/03/Shropshire-Economic-Analysis-Report-FINAL-170308.pdf	Error message in index
A research report by IPPR North	November 2016	Sarah Longlands	24/11/17 11:28:15	http://www.investinshropshire.co.uk/wp-content/uploads/2017/03/Shropshire-Economic-Analysis-Report-FINAL-171124.pdf Also at: https://shropshire.gov.uk/media/8782/ippr-north-report-economic-analysis-november-2016.pdf	Revised index
A report by IPPR North	February 2017	Sarah Longlands	20/11/17 11:07:38	http://www.investinshropshire.co.uk/wp-content/uploads/2016/05/Building-an-Economic-Vision-for-Shropshire-summary-IPPR-North.pdf	Summary report

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Significant errors

1.	25	i) Table 3: The percentages are wrong, in the "Workplace of Residents" table. They are based on the Total of 116,706 for the "Residence of Workers" table.
2.		ii) Table 3: The two totals quoted, of 111,425 and 116,706 are not consistent with the totals of about 147,600 for Shropshire's employees (the total derived from the Table 4 figures)
3.	27	i) Table 4: the column headed "% Change" is incorrect. The numbers shown are the actual change, not the percentage change
4.	29	Table 5: the conclusions for Opportunities are unsound because of the selection of sectors that are growing by employment of 0.5%+. This 0.5%+ has been identified from the figures in Table 3. Error no 1 above identifies that the relevant figures were not percentages. The conclusions for "Wholesale/ retail trade/repair of motors" and for "Human health and social work" are therefore invalid

Minor errors that should have been corrected

1.	3	Final sentence. There is apparently no "separate report" other than this Research report.
2.	6	First line under 2.2.1. Background: According to Shropshire Council's Corporate Plan 2016-17 (see footnote 10) Shropshire is the 2 nd largest inland council, not the largest.
3.	6	Penultimate paragraph: Shropshire, whether the ceremonial county or the Shropshire Council area, does not completely encircle the Telford and Wrekin area. T&W's eastern border is with Staffordshire, as shown in Figure 2.
4.	14	i) The reference to figure 6 at line 2 should be a reference to figure 5
5.		ii) The reference to figure 3 at line 1 of paragraph 2 should be a reference to figure 5
6.		iii) The reference to figure 4 at the end of paragraph 2 is incorrect. Figure 4 shows the position in 2015, not a future trend.
7.		iv) Footnote 15. There is no longer a "Shropshire County Council". They mean Shropshire Council, the client that commissioned their report.
8.		v) Footnote 16 refers to "Luke's data". There is no indication what this might be.
9.	15	Figure 6 gives no indication what the units are on the vertical axis.
10.	18	i) Under 3.3, 1 st paragraph, line 3: the reference to figures 6 and 7 should be a reference to figures 7, 8 and 9
11.		ii) Under 3.3, 1 st paragraph, line 5: The reference to figure 6 should be a reference to figure 7
12.		iii) Under 3.3, 2 nd paragraph, line 1: The reference to figure 8 should be a reference to figure 9
13.		iv) Footnote 26: The reference to figures 6 and 8 should be a reference to figures 7 and 9
14.	19	i) Figure 7: The chart exaggerates the appearance of difference between the UK

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		and Shropshire figures by starting the vertical axis at £15.00 rather than at zero.
15.		ii) Figure 7: It should be "Shropshire C" not "Shropshire CC"
16.		iii) Figure 8: The chart exaggerates the appearance of difference between the lines on the graph by starting the vertical axis at 90 rather than at zero
17.		iv) Figure 9: As Shropshire's productivity is shown as being almost identical to that of the West Midlands region as a whole, it would be instructive to know which regions had a higher productivity than the UK average.
18.		v) Figure 9: It should be "Shropshire C" not "Shropshire CC"
19.	20	i) The reference to figure 9 at line 5 should be a reference to figure 10
20.		ii) Figure 10: The chart exaggerates the appearance of difference between the lines on the graph by starting the vertical axis at 64.0 rather than at zero
21.		iii) The reference to figure 10 in the pre-penultimate line should be a reference to figure 11
22.	21	i) Figure 11: The chart exaggerates the appearance of difference between the lines on the graph by starting the vertical axis at 10,000 rather than at zero
23.		ii) Figure 11: It should be "Shropshire C" not "Shropshire CC"
24.	22	The reference to figures 11 and 12 on the penultimate line should be a reference to figures 12 and 13
25.	23	i) The reference to figure 13 on the 1st line should be a reference to figure 14
26.		ii) The reference to figure 13 on the 1st line of paragraph 3 should be a reference to figure 14
27.	25	i) Penultimate line: word "who" is missing
28.		ii) Figure 15 heading: inconsistent font used
29.	27	i) Table 4 heading: the period should be 2016-2026, not 2006-2036
30.		ii) Table 4: there is no statement of what the units are for "Employment by sector" or for "GVA by sector"
31.		iii) Table 4: it would have been helpful to have shown the column totals
32.	28	i) The reference to figure 14 on the 2nd line should be a reference to figure 16
33.		ii) The reference to figure 15 on the 4th line should be a reference to figure 17
34.		iii) Figure 17 heading: inconsistent font used
35.	29	i) The reference to figures 14 and 15 on the 1st line should be a reference to figures 16 and 17
36.		ii) "indicates" on the 1 st line should be "indicate"
37.	30	Pre-penultimate line of main text: Harper Adams is in the Telford & Wrekin Council area, not the Shropshire Council area
38.	31	Figure 18 heading: the heading is placed below the chart to which it refers, as are

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		subsequent headings. This is inconsistent with the previous presentation.
39.	32	Figure 21: the wrong chart type has been used. A graph is not appropriate. The data should be represented by columns
40.	33	i) Figure 22: the term "SSV" is not explained
41.		ii) Figure 23: the wrong chart type has been used. A graph is not appropriate. The data should be represented by columns
42.	35	Figure 25: The chart exaggerates the appearance of difference between the bars on by starting the horizontal axis at 45 rather than at zero
43.	37	1st line, 2 nd paragraph under 3.7.1: "of" should be "off"
44.	39	i) The reference to figure 17 in the 3 rd sentence should be a reference to figure 29
45.		ii) The reference to figure 18 in the penultimate line of the main text should be a reference to figure 29
46.	43	i) 2 nd line under "Vision": "it" should be "its"
47.		ii) Under "Actions", 1 st bullet point, 2 nd sub-bullet point, last line: in "workforce is a proven", remove the word "a".
48.		iii) Under "Actions", 2 nd bullet point: The term "VCS" is not defined
49.	45	Under <i>Food, Drink and Tourism</i> , 1 st bullet point, 6 th line; Remove one of the full stops.
50.	47	Pre-penultimate bullet point: again, Harper Adams University is in the Telford & Wrekin Council area, not the Shropshire Council area

Detailed comments on the Hierarchy of Settlements methodology

Detailed comments on the Hierarchy of Settlements methodology, for Question 7 of the consultation questionnaire:

Do you agree with the proposed 'Community Hubs' identified within Table 3 of the Consultation Document?

Introduction

On the questionnaire requested by Shropshire Council as part of the Consultation on the Local Plan review, Question 7 relates to the designation of 'Community Hubs' and asks whether you agree with the list they have produced. This CPRE paper sets out in detail how the 'scoring' has been done in order to arrive at the list of designated Hubs. We think that:

- the scoring system was not necessarily agreed at the last consultation, contrary to what Shropshire Council maintain,
- the scoring system has in any case been significantly changed, and
- the list of Community Hubs as produced includes some settlements that do not meet Shropshire Council's own definition of what a Hub should contain.

Background

For this Local Plan Review Shropshire Council want to impose "Hub" status on certain villages, using an 'objective' system, rather than allowing each village to choose whether it becomes a Hub, as happened last time. Hubs and "Clusters" are those settlements where most of the housing in rural areas will go. Hubs will probably get the lion's share of the 7,875 houses that are earmarked for villages, and these are likely to be built within designated development boundaries. Clusters will get mainly "infill", but will not have any development boundaries.

In the last round of consultation, Shropshire Council asked about their proposed scoring system for deciding "objectively" which villages should be Hubs. The question they actually asked (Question 12) was: *Do you agree with the approach and/or the methodology proposed to identify Community Hubs?* 73% of respondents did agree, but to what? It is quite possible that agreement was with only the general approach of using some 'objective' criteria, rather than with the precise methodology.

But Shropshire Council maintain that because of that 73% agreement, the scoring system is no longer subject to further consultation. However, they do say that the way it has been applied in order to identify proposed Community Hubs is open for consultation. Question 7 of the questionnaire specifically asks for views on the suitability of the proposed Community Hubs.

But (1) they have actually significantly altered the scoring system, and (2), it is clear that villages could not possibly have seen whether the proposed scoring system was fair and equitable, until they saw how it was applied in practice, particularly in comparison with the County's towns.

So we think that Parishes (and individuals) should tell Shropshire Council if they think the scores are wrong. They should also say if they disagree with any of the proposed Hubs.

Detailed comments on the Hierarchy of Settlements methodology

Below, we comment in detail (particularly on the scoring system) on each of the four steps taken in the process of settling on the 40 proposed Community Hubs, as set out in the Hierarchy of Settlements methodology.

Stage 1: Identification of Settlements

Shropshire Council staff first identified about 550 '*recognisable named settlements*' throughout Shropshire (Appendix 1, pages 19 to 22 of the HoS document). Although people may know some hamlets that are not in the list, all settlements that could possibly be designated as Hubs will have been included in the list.

Stage 2: Screening of Settlements

The Council's demographers then worked out, as best as they could, how many people and how many houses were in each settlement. They say that they then screened-out all settlements that had either less than 100 people, or less than 50 dwellings, and any other settlements that were too dispersed. Those lists are at Appendix 2, pages 23 to 33 of the HoS document.

Stage 3: Assessment of Screened-In Settlements - the scoring system

The screened-in settlements were then assessed, and scored on a number of criteria. The criteria are tabled on pages 11 and 13 of the HoS document, and the scoring lists are set out in Appendix 3, pages 35 to 42 of the HoS document. A few of the supposedly screened-out settlements have for some reason crept back into these lists, and a few of those have scored surprisingly well.

Changes in the methodology

Shropshire Council maintain that the scoring system was agreed by 73% of people in the last consultation, and that it should not therefore be part of this consultation. But even if that proportion of people agreed *with the approach and/or the methodology proposed to identify Community Hubs* (Question 12 of the I&O consultation) they may well have assumed that scores would be awarded proportionately for each criterion, up to the maximum stated. But instead, scores have been awarded on a simplistic binary system; settlements either get the whole score, or they get no score (subject to the additions for multiple facilities).

Furthermore, the scoring system has been changed, and the maximum score has been reduced from 130 to 116.

- 'Significant employment opportunity' has been reduced from a score of 10, to one of 5, with an additional 2 scored for more than one qualifying employer at that settlement.
- 'Train station or bus stop' has been reduced from a score of 10, to one of 5. In the I&O papers, the criteria was in one place (paragraph 3.23) described as being a 'main line railway station or bus station' rather than a 'train station or bus stop'.
- 'Regular peak time public transport service' has been reduced from a score of 10 to one of 5.
- 'Rural hinterland', which had a score of 6, has been removed from the scoring system.

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- 'Consistent access to high speed broadband' has been added to the scoring system and given a score of 5.

We cannot find any explanation for these changes in the scoring system, other than for broadband provision, which arguably should not have been omitted originally.

When compared with the scores awarded to urban areas, it is clear that the scores for villages are not at all proportionate. Some of the scores are plainly wrong, being based on factually incorrect assumptions.

The actual criteria used are as follows:

Primary services used on a regular basis that are essential to everyday life

- Nursery/Pre-School
- Primary school
- NHS GP Surgery
- Convenience store
- Post Office
- Petrol station
- Community Hall

Each such service present is given a score of 4, with an additional 2 points where there is more than one such service present.

We suggest that centres like Shrewsbury and the Principal market towns should be awarded 4 points for each such service, rather than a single extra score of 2 if they have more than one such service, however many over one that happens to be.

There should also be a grading according to the offer given by the particular service in question, particularly if it is a restricted service. For instance, a well-stocked shop might be awarded a score of 4, but a very basic shop might have a score of only 2.

Secondary services that are not needed on a day to day basis

- Secondary school
- Library
- NHS Hospital
- NHS Dentist
- Chemist/Pharmacy
- Supermarket
- Bank/Building Society
- Public House
- Place of Worship
- Leisure Centre
- Children's playground
- Outdoor sports facility
- Amenity green space

Each such service present is given a score of 3, with an additional 1 point where there is more than one such service present.

Again, we suggest that centres like Shrewsbury and the Principal market towns should be awarded 3 points for each such service, rather than a single extra score of 1 if they have more than one such service, however many over one that happens to be. There should also be a grading according to the offer given by the particular service in question, particularly if it is a restricted service.

Where a village has a service that is much more limited than in one of the towns (for instance playgrounds, outdoor sports facilities and amenity green spaces) it is disproportionate for it to be awarded the same score as a town. It seems particularly preposterous that villages that have a library bus only once a fortnight for less than one hour

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should be awarded the same number of points as towns with a permanent library open at all usual times.

We note that the Orthopaedic Hospital at Gobowen does not appear to have been scored anywhere on the scoring matrix, nor the employment that it provides.

Other services

- Consistent access to high speed broadband: score of 5.

The first stated aim of Connecting Shropshire is to deliver superfast broadband to all premises in the Shropshire Council area by 2020. A maximum score of 5 for coverage of only 75% does not therefore pick out those settlements with the best coverage.

There are still many rural “premises” that do not have good or even reliable broadband coverage. Rural settlements are still at a disadvantage, so it seems unlikely that a score of 5 is justified for many rural villages, in comparison with urban areas with better coverage. The Council’s chosen threshold of 75% coverage seems to be too low, and essentially meaningless; there are only five settlements out of the 223 listed in the scoring system which do not get the top (and only) score of 5.

- Significant employment opportunity: score of 5 with an extra 2 points where there is more than one such opportunity.

Once again, it seems preposterous that villages with relatively limited employment options are awarded the same number of points as Shrewsbury and market towns, with their huge number and variety of jobs. The scoring system should be graduated, according to the number of jobs available.

- Active public transport link: score of 5.

The public transport available in villages is often a fairly rudimentary bus service. It seems preposterous that such villages are awarded the same number of points as Shrewsbury and market towns which have much more extensive services. There should be some weighting according to the number of buses available, rather than giving an all or nothing score for this service. There should also be separate scores awarded for bus links and for train links.

- Regular public transport link: score of 5.

The same comments as for the Active link apply equally for the Regular link. In addition, the ability to return to a village after an evening’s entertainment in Shrewsbury or a local town should also figure.

Stage 4: Categorisation of Settlements

Page 25, paragraph 6.4 of the main Preferred Options document has the following definition of Community Hubs:

Settlements which have a ‘sufficient population’ to maintain a range of services; facilities; and employment. In these settlements, appropriate sustainable development should contribute to the retention and enhancement of these existing services; facilities and employment. It should also support the provision of new housing to meet local needs; services; facilities; and employment opportunities

Page 4, Table 2 of the Hierarchy of Settlements document says of Community Hub Settlements that:

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Whilst the exact combination varies, the settlements within this category are considered to provide a combination of services and facilities, public transport links (often operating regularly through peak travel times), significant employment opportunities, and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities.

Both these two definitions require Community Hubs to have significant employment opportunities. However, page 17, paragraph 5.40 of the Hierarchy of Settlements document says, of Thresholds, that

The lower threshold identified for community hubs is considered appropriate as:

- *There is a three point gap between the last community hub settlement and the first other rural settlement.*
- *Settlements identified as community hubs are generally considered to offer sufficient services and facilities to meet the day-to-day needs of their resident communities. Whereas settlements classified as 'other rural settlement' are likely to have at least a partial reliance upon other settlements to meet certain day-to-day needs.*

The actual choice of the 40 proposed hubs in accordance with paragraph 5.40 is therefore inconsistent with the above two definitions of Hubs, which require that Hubs should have (1) a combination of services and facilities AND (2) public transport links AND (3) significant employment opportunities.

We therefore do not think that the presently adopted scoring system (with an arbitrary line drawn between Weston Rhyn/Preesgweene and Wistanstow, simply because there happens to be a three-point gap between them) is a properly objectively assessed method for identifying Hubs according to the definitions given above.

On the public transport criterion, at least one of the settlements identified (Ditton Priors) would fail the test.

On the employment criterion, 19 of the settlements identified (i.e. nearly half) would fail the test.

On the combination of services and facilities criterion, if for instance, it had been objectively decided that, to be designated as a Hub, a settlement should have at least five of the seven criteria deemed to be essential to everyday life, then seven of the forty designated Hubs would have failed the test. In fact, it could be argued that, to be sustainable, a Hub should contain all seven of the services deemed to be essential to everyday life. If that were the case, only four of them would qualify.

If the scoring system proposed at the Issues & Options stage were used, the "three-point gap" would not exist. In fact, there would be no easily identifiable demarcating gap sufficient to draw a line at a suitable place in the scoring order. Also, one of the supposedly screened-out settlements (Hopton Wafers) would score more than one of the proposed Hubs (Trefonen).

Detailed comments on the Hierarchy of Settlements methodology

Conclusion

We conclude that both the scoring system and the list of 40 Community Hubs must be revised, in order to be deemed to be arrived at under a properly objectively assessed methodology.

