

**Shropshire Local Plan Review**

**Consultation on Strategic Sites**

**Response from the**

**Campaign to Protect Rural England**

**(Shropshire Branch)**

**September 2019**

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**Summary**

This Strategic Sites stage is the fourth in a series of informal[[1]](#footnote-1) consultations, leading to the deposit of a Final Plan (expected in about March 2020) which will be subject to formal consultation, followed by Examination in Public by a Government planning inspector.

The main objectives of this stage of consultation are[[2]](#footnote-2) to obtain feedback concerning:

1. A series of preferred strategic sites, specifically:

a) Clive Barracks, Tern Hill;

b) Former Ironbridge Power Station; and

c) RAF Cosford.

1. A further potential strategic site at land north of Junction 3 of the M54, which is currently subject to consideration but is not currently a preferred strategic site.

Key points arising at this stage of consultation are:

**Preferred Strategic Sites**

* It is accepted that development should take place on the three preferred sites, because they contain large elements of brownfield land.
* The provision of preliminary masterplans and the promise of sustainable communities with a balance of employment land will not prevent commuting into and out of these strategic sites.
* RAF Cosford does not need to be taken out of the Green Belt.
* However, to preserve the openness of the Green Belt and to retain a strategic gap with Albrighton, the undeveloped area currently occupied by the airfield itself should not be built on.
* Concerns about the provision of infrastructure to support development must be satisfactorily addressed.
* Housing and employment guidelines for the sites must be taken to be part of the overall Local Plan Review targets of 28,750 dwellings (or lower, as supported by CPRE) and around 300 Ha of employment land (or lower, as supported by CPRE). Officers have now confirmed that this will be the case.[[3]](#footnote-3)
* Further removal of land from the Green Belt along the M54 is not supported, in particular development of the Bradford Estate, north of Junction 3.

**Land north of Junction 3 of the M54 (Bradford Estate)**

* The process surrounding this emerging proposal is somewhat chaotic. An “Emerging masterplan” has appeared only in the last few days of the consultation, and Shropshire Council, rather than the promoters, appears to be advertising a version of the site.
* Officers have confirmed that the J3 Bradford Estate proposal *“is being considered in the context of a request from the Association of Black Country Authorities to meet some of their unmet housing and employment need”*[[4]](#footnote-4).
* In that context, important documents have been added to the Evidence Base at this stage of consultation, but have not been deposited publicly.

**The M54 corridor and the Green Belt**

* We commissioned a report about Avison Young’s *M54 Growth Corridor – Strategic Options Study*, which is attached as Appendix 1. This report concludes that:

1. The need for economic development is exaggerated.
2. The Black Country figures, which underpin the need for the J3 Bradford Estate proposal, are still indeterminate.
3. Proper assessments are lacking for the cumulative impacts on transport, climate change, the environment, the landscape and biodiversity.
4. The “exceptional circumstances” argument, which appears to be in prospect for release of Green Belt land, is circular in nature, being based on inflated “need” figures. Furthermore, any release of land around J3 would not properly serve NPPF purpose 5 of regenerating the Black Country urban area.

**Continuing “conversation” with Shropshire Council**

Although this particular consultation focusses on Strategic Sites, we think it appropriate just to record continuing points from this and previous stages of consultation on which we have engaged with the Council, as follows:

* **Consultation**: We continue to consider that public opinion has not been given due regard under the Gunning principles of consultation. Publicity, and the availability of documents, could have been improved. At the last consultation, on Preferred Sites, Atkins’ *Summary and Analysis of Consultation Responses* showed that, overall (based on the percentages given) respondees were two to one against the preferred allocations. The numbers of responses, rather than percentages, have yet to be released.
* **Housing numbers**: The housing target of 28,750 is well above demographic need, is above the Government’s minimum requirement (as set out in its Standard Methodology), and is opposed by public opinion. A target of 26,250 would be more appropriate. It is instructive to recognise that the current target is made up of four distinct elements.
* **Employment land figures**: The need is overstated. The “Balanced Growth” strategy is too mechanistic in its approach and, with regards to large sites, ignores other developments in neighbouring authorities. Furthermore, the calculation itself does not take due note of the above four distinct elements of the housing target. The Council’s calculations are inconsistent both with the desire for a “step change” in productivity and with the evidence base.
* **The right housing in the right place**: There should be an assessment of the needs of differing sections of the population, particularly including the ageing population. The market cannot be relied on to provide the kind of housing needed in order to retain working age and younger people within the County, and while the Council’s measures to increase the proportion of affordable or low-cost housing are to be welcomed, they are not enough. The use of cross-subsidy sites is but one measure, and should be backed up by housing needs assessments, and predicated on each such site having a very high percentage of affordable housing.
* **Sustainability:** Despite the recent declaration by the Council of a Climate Emergency there does not appear to be enough emphasis placed on carbon reduction measures. Continued growth, particularly in commuter villages, exacerbates the problem. Examples include the methodology of the Sustainability Appraisal, the allocation of sites with “Poor” sustainability scores, the selection as potential Hubs of villages without sufficient primary services, and the channelling of development into the M54 corridor.
* **Rural Hubs:** The Hierarchy of Settlements methodology, used to identify the proposed Hubs, remains flawed. We have identified that twenty of the proposed Hubs do not appear to qualify for Hub status under the current definition. They should instead become Clusters.
* **Infrastructure and design:** It is vital that measures to promote good infrastructure and design are brought into the Local Plan in a way that gives them real teeth and the prospect of implementation. Efforts need to be targeted at infrastructure which will mitigate against Climate Change, which may not be the case with proposals such as the Shrewsbury North West Relief Road. Better provision is also needed for social facilities, and for rural broadband and public transport. The Local Plan should incorporate master plans.
* **The whole process of Local Plans and targets:** CPRE National Office recently made a submission to the House of Commons Committee of Public Accounts, who published their report *“Planning and the broken housing market”* on 19 June 2019. Appendix 2 shows the “Local Plans” section of that CPRE submission. Some of this submission’s conclusions are that:

1. Government continually puts obstacles in the way of achieving up-to-date Local Plans, and then blames massively under-resourced local authorities for this failure. It doesn’t help that plans increasingly are seen to need a vast monolithic book, the entirety of which must be rewritten from scratch, rather than as a collection of interrelated policies and proposals, some of which are capable of lasting for decades without the need to change.
2. If any of the several reasons within the NPPF as to why a plan might become out-of-date apply then developers can claim that the plan is to some extent invalid, and this in effect removes the community’s ability to manage development in its area. Strangely, nobody views the fact that housebuilders aren’t applying for planning permission on allocated sites or building homes as being an indication that, perhaps, there isn’t the level of housing need/demand in the area that had previously been thought.
3. Serious action needs to be taken to properly address the preparation and adoption of local plans, as the current regime is not delivering value for money or achieving its intended outcome.
4. Regard should be paid to recommendations 3 to 5 of the Raynsford Review of Planning[[5]](#footnote-5) (pp.90-93). One of the key reasons why local plans are declared out of date so easily is the simplistic and uncompromising approach to housebuilding targets.
5. The perverse situation of being measured simply against a homes target could be remedied in two simple respects:
   1. Councils should be required to be able to demonstrate a 5-year supply of housing land in terms of sites identified in local plans, neighbourhood plans and on brownfield registers, as well as sites with planning permission. The burden of proof on deliverability of these sites should be reversed, such that it is assumed that all these sites are deliverable within 5 years, unless the landowner/developer declares that they are not (in which case it should be reasonable to revoke the planning consent).
   2. The housing delivery test should be completely excised from the NPPF and planning practice guidance, since it penalises councils and communities for the failures of housebuilders.  It’s worth noting that it also adds an enormous amount of unnecessary complexity to the NPPF and practice guidance.
6. **Introduction**
   1. CPRE Shropshire welcomes the opportunity to respond to this Strategic Sites stage of the Shropshire Council Local Plan Review. This document elaborates on our detailed responses to the Strategic Sites Questionnaire. We submit both documents as a single combined response.
   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 nearly 400 registered members.
   3. CPRE Shropshire supports a beautiful and thriving countryside that enriches all our lives. 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.
   4. However, we do not believe that the continued aspirational growth preferred by Shropshire Council will protect Shropshire’s special qualities or serve its resident population to best effect. Some of our continuing arguments, made largely at the previous stages of consultation, are encapsulated in the above Summary section.
   5. For those reasons, we think it is essential that the additional housing and employment land which may be brought forward under the present Strategic Sites proposals should be included within the existing targets, and should not be additional to them.
   6. We continue to appreciate the pressures under which Shropshire Council officers and members operate, and we appreciate that the consultation process surrounding the Local Plan Review is therefore a “moving target” under which fresh evidence and commissioned reports appear, resulting in the Council’s position emerging only over a period of time, however regrettable this may be.
   7. It is worth recording that a further 184 pages (12 MB) of documents were produced for this consultation. The supporting Evidence Base for the Local Plan (including the new documents) now totals 6,657pages (1,238 MB). The majority of these are not available to people without internet access, nor are available in hard copy at public locations. In fact, at public locations, no hard copies were available of the main Sustainability Appraisal, the main Habitats Regulations Assessment, or the M54 Growth Corridor Study. At the earlier stages of consultation we recorded why we considered that the usefulness of the consultation is undermined by weaknesses in them, but those are not repeated here.
   8. Our general concerns about the Local Plan Review process at previous rounds of consultation have also been set out previously and are also not repeated here.
7. **The three preferred strategic sites**
   1. In general:

* All sites should maximise ways of contributing to mitigating climate change and loss of habitat.
* Masterplans are by their nature only promises, and are prone to change. If they are to have teeth, and to reflect consultation responses, the Council should take control of them, to avoid possible “slippage” if sites are sold on to other developers.
* Housing provision should also be “future-proofed” for zero carbon emissions, for a suitable mix for the ageing population, and for a high proportion of affordable housing.
* The aim of balancing housing with employment land is unlikely to prevent substantial levels of cross-commuting and other trip generation on sites poorly linked to key centres. Transport infrastructure that supports walking, cycling and the use of public transport will need to be improved to avoid increasing congestion and climate change emissions.
* The provision of schools, medical practices and other key facilities will need to be carefully dovetailed into the wider needs of the surrounding settlements. Schools should be sited where air quality is not compromised by traffic.
* New green infrastructure, footpaths and cycleways should be provided, and should seek to make connections with existing habitat and networks in the area, so that there are no isolated enclaves within each site.
* Any extra costs associated with dealing with contaminated land or existing nuisance must not be allowed to be used as a reason for reducing the provision of affordable housing or other potential site amenities.
* No development should take place in areas at risk of flooding and these areas should be incorporated into the green network.
  1. Detailed comments on each of the three sites are given in section 6 below. Some further key points are:

*Clive Barracks, Tern Hill*

* More employment land may be required, perhaps in conjunction with Keele University.

*Former Ironbridge Power Station*

* It would be preferable if fewer than 1,000 houses are built on the site.
* Much more employment land is needed than envisaged in the masterplan.
* The site itself is a monument to what are increasingly considered to be the excesses of coal-fired power, with its contribution to climate change. The opportunity should be taken to build into the development some recognition of this aspect of the past, perhaps by creating a memorial park where the cooling towers stood, particularly as this is contiguous to the existing World Heritage site.
* The existing National Grid and Western Power buildings and powerlines in the middle of the site are a significant constraint. Schools should be sited well away from the power lines.
* Careful landscaping will be needed after sand and gravel extraction, particularly bearing in mind proximity to the nearby AONB and the contiguous World Heritage Site.
* The railway should be retained and linked to the main railway network, along with improved bus connections.
* Some mitigation of the effects of the scheme on Much Wenlock and Buildwas could be provided through the CIL moneys raised.

*RAF Cosford*

* Commenting on the potential plans is made more difficult because no geographical location is outlined for any potential developments, nor any likely extent of them.
* Better facilities at the local railway stations will be needed.
* We are surprised that no specific question has been asked about the Green Belt aspects of this proposal. There seems no need to release the already largely built up areas from the Green Belt. The proposal to retain only the airfield area south of the runway in the Green Belt seems somewhat arbitrary; it seems logical also to retain an equivalent area north of the runway. But overall, there is no pressing need to remove any of RAF Cosford from the Green Belt, because existing policy allows military-related-development with minimal constraint.

1. **Green Belt, M54 corridor and J3 Bradford Estate proposal**
   1. The process surrounding the emerging J3 Bradford Estate proposal appears to be a moving target, and is somewhat chaotic. It is regrettable that an “Emerging masterplan” leaflet should have been produced and circulated by the promoters of this site some eight weeks into the consultation period, and that the map within that leaflet has appeared on their website only within the last few days of the consultation. It also remains puzzling that Shropshire Council (rather than the promoters of the site) have taken it upon themselves to advertise a site area larger than that identified in the consultation document (apparently on verbal information only) as an investment opportunity on their Invest in Shropshire website[[6]](#footnote-6).
   2. Nevertheless, officers have confirmed that the J3 Bradford Estate proposal *“is being considered in the context of a request from the Association of Black Country Authorities to meet some of their unmet housing and employment need”*[[7]](#footnote-7).
   3. In that context, important documents have been added to the Evidence Base at this stage of consultation, namely (1) Avison Young’s *M54 Growth Corridor – Strategic Options Study*,and (2) four letters with the Association of Black Country Authorities (ABCA) about cross-boundary issues. It is notable that, although the J3 Bradford Estate proposal is the most controversial part of this stage of consultation, no hard copies of these documents appear to have been deposited at the specified Council offices and libraries around the county for members of the public to view.
   4. Because it is likely that some importance will be attached to Avison Young’s *M54 Growth Corridor – Strategic Options Study*, we have commissioned a report about it which is attached as Appendix 1. This report touches also on the recurring themes of the Shropshire Plan, housing numbers and economic development before commenting on issues of direct relevance to the J3 Bradford Estate proposal, concerning the Black Country, transport, the Green Belt and other matters. Its main conclusions under each of these headings are set out below.

*Housing numbers overestimate*

* 1. There is no housing need in the Shropshire Council area which requires the allocation of large-scale housing in the Green Belt.
  2. The M54 Study refers to a net additional housing requirement of 10,250 based on the current completions, commitments and allocations but does not account for even the Council’s own assessment of other provision, such as windfalls. Furthermore, its approach would result in any shortfall being almost entirely directed to this one corridor and to an area of protected Green Belt.

*Economic Development*

* 1. Although the M54 Study states that *‘the reasons for Shropshire’s comparatively poor economic productivity are well rehearsed’*, the economic evidence is more opaque than that. For instance, the Economic Growth Strategy for Shropshire 2017-21 sets a target of increasing GVA by 12%, without clear justification. That target is higher than that of the West Midlands Combined Authority and as we are already about half way through the EGS plan period, is likely anyway to be measurably over-ambitious.
  2. The emphasis on Shropshire’s lower than average GVA is anyway misplaced. Half the Local Authorities in the country will have a lower than average GVA. Shropshire’s GVA is determined partly by its rural and agricultural nature, so it sits naturally in the lower reaches of the national GVA range.
  3. The ambition to provide more housing than is demographically required would necessarily result in more people coming into the county. The Council’s response via the calculations within its “balanced growth” strategy ignores (1) evidence of a more productive growth strategy aiming more towards 31 sq m per job than 42.25; (2) many people buying the new houses will be retired; and (3) many people buying the new houses will take up jobs not requiring employment land.
  4. The argument for balancing housing with employment land at the separate settlements around the county (including at the proposed J3 Bradford Estate settlement) has flawed logic anyway, because (1) people living in the new houses will not necessarily work nearby; and (2) they will make many other journeys which are not work-related. The balanced approach will therefore not necessarily reduce car dependency and commuting.
  5. The optimistic view of economic development prospects relies partly on the promises of HS2 which may now take longer to materialise than expected, with a chance that they may never happen. In any case the benefits would be likely to draw investment away from Shropshire, so the benefits to the M54 corridor within Shropshire would be minimal.
  6. The M54 Study does not place due emphasis on the thrust on developing brownfield land within e.g. the WMCA SIDP.
  7. The promotion of larger employment sites, e.g. the 50 Ha of employment land within the J3 Bradford Estate proposal, serves a regional purpose so is best determined at a regional, not a county level, and should take full account of competing developments, for example at Four Ashes in Staffordshire. The role of the M54 is more relevant to Telford or Wolverhampton than to the Shropshire Council area.

*Black Country*

* 1. The Black Country Options consultation underplayed the fact that possibly as many as 12,500 homes could potentially be built on derelict industrial land. Also, the stated shortfall was chiefly for larger sites, but failed to account for significant nearby sites, e.g. Four Ashes.
  2. It remains unclear what figure ABCA will promote in their Preferred Option consultation, perhaps next year.
  3. Even if ABCA do identify a shortfall, it has its own areas of abutting Green Belt where development could be directed. Other nearby local authorities also have areas of Green Belt that are nearer to the ABCA area than is the proposed J3 Bradford Estate location.
  4. It would certainly be preferable to accommodate the Black Country’s growth within the conurbation and it is premature to assume the role of the M54 as an overspill for future growth in the Black Country. It is in fact more likely that significant development along the M54 corridor would undermine regeneration in the Black Country.
  5. If there is indeed already an overprovision for employment land, and if Shropshire’s and other nearby competing authorities’ Economic Growth Strategies are over-optimistic, then there is a real risk that the J3 Bradford Estate employment sites may not be taken up. This would lead to only the housing element being delivered, creating a commuter belt, the opposite of what is claimed as a ‘balanced growth’ strategy.

*Transport*

* 1. There is no assessment in the M54 Study of whether the sites considered represent sustainable locations in transport terms. In particular the J3 Bradford Estate site is likely to generate considerably increased car travel, because of its attraction to commuters particularly to Telford and to the West Midlands.

*Green Belt*

* 1. All five sites within the M54 Study would have to fulfil the “exceptional circumstances” test within the NPPF in order for development to be sanctioned. The M54 Study presents a circular argument for this by artificially raising the need in order to create the requirement for “exceptional circumstances” to be merited.
  2. There has yet to be any attempt to demonstrate that the necessary exceptional circumstances exist to justify the proposed release of Green Belt land around Junction 3 of the M54.
  3. Paragraph 136 of the NPPF requires that:

*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*.

* 1. Paragraph 137 of the NPPF sets out a particular requirement in relation to Green Belt releases:

*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

1. *makes as much use as possible of suitable brownfield sites and underutilised land;*
2. *optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
3. *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.* 
   1. Any interpretation of the need to promote sustainable patterns of development should look not just at the situation within Shropshire, but at the context for which the West Midlands Green Belt was primarily designated, which is to contain urban sprawl from the West Midlands Conurbation.
   2. Green Belt Reviews, including that carried out for Shropshire Council by LUC, do not generally test the fifth purpose of Green Belt, which is *‘to assist in urban regeneration, by encouraging the recycling of derelict and other urban land’.*
   3. This fifth purpose is very important in the present circumstances because the designation of the Green Belt around the West Midlands has always been seen as fulfilling that purpose. There is therefore a clear risk that designating a site such as the J3 Bradford Estate proposal within the West Midlands Green Belt for housing and industry will undermine that regeneration.
   4. The M54 Study suggests misleadingly that Green Belt Reviews can quantify the ‘harm’ that can be balanced against any gain from a development. Firstly, an individual plot of land is likely often either to fit the purposes 1, 2 and 4 which relate to urban form or to fit purpose 3 which relates to the integrity of the countryside; the J3 Bradford Estate site includes two parcels which have a strong impact on the countryside, whereas the site close to Telford is in a parcel which has a strong impact on purpose 2 according to LUC; the result is that parcels rarely have a strong impact in all four areas. Secondly, the parcelling up of land results in individual sites being considered discretely for Green Belt purposes, while in economic terms they are, as in this case, clearly linked; one important local benefit, for example, of the Green Belt in this location is that it stops Telford, Albrighton and Shifnal from merging.
   5. To properly assess ‘exceptional circumstances’ for Green Belt releases in the M54 corridor requires:
4. that the strategy approach being undertaken, which requires Green Belt releases, is justified in terms of exceptional need;
5. that there are no alternative sites or strategy approach that could be taken utilising land elsewhere in Shropshire;
6. that other sites meeting those needs in neighbouring authorities have been fully considered;
7. that the impacts on the five purposes have been fully assessed, not just of individual sites, but of the overall development approach, including the impact on purpose 5; and
8. that the negative impacts on traffic growth, carbon emissions, landscape and biodiversity have been addressed in a robust way.

*Other matters*

* 1. The M54 Growth Study is limited in scope because (1) it does not assess the impacts of the proposals as to cumulative transport, climate change, the environment, the landscape or biodiversity; (2) it does not consider alternative sites within Shropshire or nearby, particularly the Black Country; (3) it does not consider brownfield regeneration; and (4) consultation was with a restricted group of stakeholders.
  2. The report’s comments on the individual sites are replicated elsewhere in this submission.
  3. The conclusions of the report are that the M54 Study does not produce a persuasive argument as to:

1. why the land is needed to be released;
2. why there are ‘exceptional circumstances’ to justify its release from the Green Belt;
3. why these would be sustainable locations in transport terms; and
4. what the impact would be on the landscape, biodiversity and wider environmental concerns, such as climate change.
   1. The M54 Study should consider a wider context than just this part of Shropshire, in case development could be better directed to other parts of Shropshire or to other parts of the region.
5. **Sustainability Appraisal**
   1. Paragraph 1.5 of the present Sustainability Appraisal records that the methodology is the same as that used for the Preferred Sites consultation, because at the time of preparing it the comments on the SA for the Preferred Sites were not available[[8]](#footnote-8).
   2. As noted by us (and presumably by others too) in our previous consultation response, the previous SA carried two significant flaws, in that:
6. Firstly it failed to carry some of the Table 2.1 Sustainability Objectivesinto the15 criteria for assessing sites (Table 2.3). In particular, the SO12 objective to *“reduce carbon dioxide emissions”* was not carried forward, and nor were SO2, SO3 or SO13.
7. Secondly, criteria 6 from Table 2.3, about the proximity of regular peak time public transport, has then not been translated into the Table 2.4 Excel spreadsheet criteria. The 15 criteria in Table 2.3 have been reduced to 14 criteria in the appendices, by the omission of this essential criterion. The numbering of the criteria in the appendices is therefore skewed by one for all criteria from 7 onwards.
   1. The present SA therefore carries the same flaws.
   2. Therefore, the detailed site assessments have not taken any account of availability of public transport, or propensity for use of the private motor car, in assessing the sustainability of any of the sites assessed.
   3. It does seem odd, and unsound, that this most important criteria for carbon savings and therefore sustainability, appears simply to have been omitted from the site assessments. This is the more so now that the Council has declared a Climate Emergency.
   4. The mitigation measures proposed for the sites rated as ”Poor” do not therefore include any measures to mitigate the effects of climate change.
   5. We also repeat what we said at the last consultation, in that CPRE Shropshire agrees with the Oswestry & District Civic Society in drawing attention to the requirement in NPPF paragraph 8c that the planning system should pursue the overarching environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including “*mitigating and adapting to climate change, including moving to a low carbon economy”*. We endorse their view that:

*The need to address carbon emissions is a responsibility which cannot be escaped, and must be addressed in order to safeguard the future of civilisations, mankind and the natural world. The Society takes the view that this issue is such that the need to address it outweighs all other considerations; and that it is of critical and urgent importance. Every nation and all sectors of society, and every individual must play a part, however small that might be. Thus the issue should be addressed by planning policy, such as those being developed in the Local Plan Review.*

* 1. Even though Shropshire Council has declared a Climate Emergency it still seems not to be pursuing this responsibility as it should, and appears to believe that all the increased human economic activity planned within the Local Plan Review process somehow *“will not necessarily result in a net growth of carbon”[[9]](#footnote-9)*. Indeed, it appears that its assessment methodology has resulted in consideration of important climate change issues being omitted altogether.
  2. This may have come about partly through the fact that in Table 5.3 on page 37 of the original January 2017 Sustainability Appraisal Scoping Report there was an under-reporting of the conflict between SO2 (encouraging economic growth) and SO3 (providing more housing), and other objectives. It is likely that both SO2 and SO3 as promoted by Shropshire Council through this Local Plan Review, would encourage increased use of cars, and that therefore both of these objectives would conflict with SO5 (encouraging use of sustainable transport), SO6 (reducing the need to travel by car), SO11 (air quality), SO12 (reducing CO2 emissions), SO13 (mitigating climate change) and SO15 (conserving heritage), as well as the conflicts actually identified in Table 5.3.

1. **Infrastructure and design**
   1. Paragraph 20 of the new NPPF states:

*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

*a) housing (including affordable housing), employment, retail, leisure and other commercial development;*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

*c) community facilities (such as health, education and cultural infrastructure); and*

*d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

* 1. This Local Plan Review to date has consulted on making provision for housing and employment, under a) above, but has not yet consulted about making provision for b), c) or d).
  2. Paragraphs 1.24 to 1.26 of the consultation document state that work has been undertaken to determine the effect of the proposals on infrastructure. However, this work has not been published as part of this consultation. It is implied that more detailed work will be published at the next stage of the Local Plan Review.
  3. Important information about infrastructure constraints is therefore not available during this consultation, which might have informed responses. At the consultation events many of the concerns voiced were about perceived difficulties over infrastructure.
  4. Equally, there may be infrastructure proposals which are controversial and unacceptable or choices to be made about infrastructure provision, for example, the extent to which public transport would need to be improved to mitigate traffic growth.
  5. As well as the need for better provision, within new development, of community facilities, such as medical care and education, there is still a gap in the existing provision of super-fast broadband, and even ordinary broadband, in many places in the county, and rural public transport is often skeletal or non-existent.
  6. It is unfortunate, as far as the provision of adequate infrastructure is concerned, that the money for infrastructure that comes in from the Community Infrastructure Levy (CIL) has such a long time-lag between the building of houses and the spending of the money.

1. **Detailed comments for the questionnaire**
   1. As noted in paragraph 1.1, we have also completed the Council’s Strategic Sites Questionnaire, which this document elaborates on. We submit both documents as a single combined response.
   2. For clarity, we have repeated below all the questions from the questionnaire. Narrative comments have been entered below rather than in the boxes on the questionnaire.

**Preferred Strategic Sites**

[**Clive Barracks, Tern Hill**](#_top)

***Q3. Do you agree with the identification of Clive Barracks, Tern Hill as a preferred strategic site?***

Yes, because of the regeneration of a predominantly brownfield site.

***Q4. Do you have any comments on the initial site guidelines for Clive Barracks, Tern Hill?***

Yes, as below.

The site guidelines are reproduced below for reference.

*Approximate site area 72Ha; The MOD and their consultants’ emerging proposals for the site would involve Mixed-use redevelopment of the site, to provide local services and facilities; around 5.75ha of employment land; around 750 homes; and extensive green infrastructure, as part of a new settlement*

1. *Housing provision on the site should be of an appropriate quantity, quality, design, mix and layout.*
2. *Employment provision is an intrinsic element of the sites redevelopment. Employment provision should be of an appropriate quantity and quality and should occur alongside the provision of housing.*
3. *The local centre will comprise of a range of commercial uses (likely to be a family pub plus convenience store and a small number of modest retail units) on land fronting the A41.The local centre ensures future occupiers of the site benefit from access to local facilities. As such its timely provision is an important consideration and should be directly linked to provision and occupation of housing on the site.*
4. *Green infrastructure provision should be of an appropriate quantity and quality. Its location should seek to protect and enhance the environmental network.*
5. *1ha of land will be provided for a primary school. This will enable Buntingsdale School and Stoke on Tern Primary School to merge on the site.*
6. *Any necessary improvements to access points and the A41/A53 Tern Hill roundabout should be undertaken. Furthermore, an air quality assessment of the impact of increased vehicular movements from this development on Tern Hill roundabout should be undertaken and its recommendations implemented.*
7. *Appropriate pedestrian and cycle links provided through the site and, in particular, to the proposed primary school and local centre. This includes enhancement of an underpass of the A41, to ensure connectivity between the north-eastern and south-western portions of the site.*
8. *Acoustic design and layout of the site and appropriate building materials (including where necessary appropriate glazing, ventilation and acoustic barriers) should mitigate any impact from noise associated with the nearby A41 and airfield.*
9. *The site may contain contaminated land, which will need to be appropriately managed.*
10. *The site contains an area of ancient woodland and may contain priority habitats, these will need to be retained and an appropriate buffer provided.*
11. *Site design and layout should be informed by an Arboricultural Impact Assessment, with the intention of creating a sustainable juxtaposition of houses and trees.*
12. *The site is in proximity of the River Tern and RAF Tern Hill Local Wildlife Sites, these will need to be appropriately buffered.*
13. *Site design and layout should reflect and respect the sites heritage and heritage assets within the wider area.*
14. *The site should incorporate sustainable drainage, informed by a sustainable drainage strategy. Development should exclude the small portions of the site located in Flood Zones 2 and/or 3 and the small portions of the site located within the 1 in 1,000 year surface flood risk zone.*
15. *Any other relevant supporting studies should be undertaken and their recommendations implemented.*

Our comments on each of these initial site guidelines are:

1. Housing provision should also be “future-proofed” for zero carbon emissions, for a suitable mix for the ageing population, and for a high proportion of affordable housing.
2. A better balance between employment provision and housing should be considered, while acknowledging that the aim of a balance is still unlikely to stop cross-commuting. Using the Council’s calculations there would be about 8 Ha of employment land, not 5.75 Ha. Another alternative might be slightly less housing to create the balance. Either way, the aim should be for the higher GVA employment sought within the EGS. The interest from Keele University sounds encouraging.
3. A local centre is of vital importance, since balancing housing with local facilities can be at least as important as balancing it with employment land. However, it will not be able to serve all local needs and at the consultation event locals were particularly concerned about connections with Market Drayton, which residents would need to access for other services.
4. Green infrastructure should seek to make connections with other habitat and footpaths in the area, and should not be isolated within the site.
5. The provision of adequate primary school facilities is vital. The primary school must be sited well away from main roads, and its air quality should be at the highest possible level.
6. At the consultation event locals were particularly concerned about connections with the main roads. An attractive underpass should be part of the site design. Air quality should not only be assessed, but measures should be incorporated to improve it. The primary school must be sited well away from main roads.
7. With both the Climate Emergency and general health concerns in mind, all possible measures should be incorporated to foster and encouraging walking and cycling links throughout any new development, although those to the school and local centre should be paramount amongst those.
8. It would be best if houses were not built right up to the A41 or airfield, but design of houses and the site should clearly mitigate against noise and other pollution to any nearby houses from the A41 or airfield.
9. Any extra costs associated with dealing with contaminated land or unexploded ordinance must not be allowed to be used as a reason for reducing the proportion of affordable housing on the site, or for reducing other site amenities.
10. As well as there being a buffer between these sites and built development, these sites should also be connected with other habitat and footpaths in the area, and should not be isolated by the site.
11. Again, the trees provided within the site should if possible be part of a connected green network rather than being isolated instances of greenery.
12. Again, as well as there being a buffer between these sites and built development, these sites should also be connected with other habitat and footpaths in the area, and should not be isolated by the site.
13. Protection of heritage assets is essential.
14. No development should take place in areas at risk of flooding and these areas should be incorporated into the green network.
15. Such studies should include ways that the site can contribute to mitigating climate change and loss of habitat. At the consultation event locals were particularly concerned about the capacity of nearby GP/doctors’ surgeries (in Market Drayton) to cope with the extra residents; there must therefore be adequate provision for this.

Our further comments are:

* The housing and employment land within this development must be taken to be part of the overall guidelines for the Shropshire Council area, which are presently stated to be 28,750 houses and about 300 Ha of employment land.

***Q5. Do you have any comments on the indicative masterplan produced by the MOD and their consultants for the redevelopment of Clive Barracks, Tern Hill?***

Yes.

Masterplans are by their nature only promises, and are prone to change. The MoD is not expected to leave until 2025, so this development is unlikely to be completed within the plan period of 2016-36. The site is likely to be sold on by the MoD to developers who will not necessarily abide by any previously published masterplan. It would be better if the MoD or the Council retained control over any masterplan to ensure that all cogent contributions to it along the way, including those from the general public (particularly those local to the site) are carried through to the final development.

The rate of housebuilding is likely to be less than 50 dwellings per year. The development would therefore need to be carefully phased to ensure relevant infrastructure is in place for residents.

[**Ironbridge Power Station**](#_top)

***Q6. Do you agree with the identification of the Former Ironbridge Power Station as a preferred strategic site?***

Yes, because of the regeneration of a predominantly brownfield site.

***Q7. Do you have any comments on the proposed site guidelines for the Former Ironbridge Power Station?***

Yes, as below.

The site guidelines are reproduced below for reference.

*Approximate site area 140 Ha; the Harworth Group’s emerging proposals for the site would involve a mixed-use development, including around 1,000 dwellings; around 6ha of employment land; a retirement village; the provision of local services and facilities within a village centre; leisure facilities; a nursery and primary school; a park and ride; a railway station; and significant areas of green infrastructure (including allotments and sports pitches), as part of a new settlement.*

1. *Housing provision on the site should be of an appropriate quantity, quality, design, mix and layout.*
2. *Employment provision is an intrinsic element of the sites redevelopment. Employment provision should be of an appropriate quantity and quality and should occur alongside the provision of housing.*
3. *The village centre ensures future occupiers of the site benefit from access to local facilities. As such its timely provision is an important consideration and should be directly linked to provision and occupation of housing on the site.*
4. *Green infrastructure provision should be of an appropriate quantity and quality. Its location should seek to protect and enhance the environmental network.*
5. *If considered needed by the relevant CCGs, the site should include provision of a medical centre.*
6. *Community facilities and buildings are required, these should tap-in to the heritage of the site and could include a community hall, art gallery and heritage centre.*
7. *If retained, current access points to the site may need to be upgraded to ghost island right turn and/or roundabout junctions as determined through appropriate modelling and engagement. Any additional access points should be appropriately designed and constructed.*
8. *Appropriate pedestrian and cycle links need to be provided through the site and in particular to the proposed nursery, primary school and village centre.*
9. *A comprehensive heritage assessment which addresses the site’s relationship with designated heritage assets (including the Ironbridge Gorge World Heritage site, Buildwas Abbey Scheduled Monument, the Severn Gorge Conservation Area and two Grade II Listed Buildings) on and in proximity of the site will be required. This should guide the conservation and enhancement of these features including through high-quality design and layout.*
10. *The Grade II listed Albert Edward railway bridge on the sites boundary and buildings and structures associated with the Ironbridge A interwar power station should be sympathetically retained, enhanced/maintained and adaptively reused.*
11. *Acoustic design and layout of the site and appropriate building materials (including where necessary appropriate glazing, ventilation and acoustic barriers) should mitigate any impact from noise associated with the retained National Grid and Western Power Distribution substations and equipment and nearby roads.*
12. *Design and layout should minimise landscape and visual impact, particularly associated with any development on greenfield elements of the site.*
13. *The site contains contaminated land, which will need to be appropriately managed.*
14. *The site contains part and is in proximity to the remainder of: the Buildwas Sand Quarry SSSI, Local Wildlife Site and Local Geological Site and Tick Wood and Benthall Edge SSSI. It may also contain priority habitat. These will need to be retained and appropriate buffers provided.*
15. *The site is also in proximity of the Buildwas River Section SSSI, three Ancient Woodland sites and other Local Wildlife Sites. An appropriate buffer to these sites will be required.*
16. *The site supports a large population of Great Crested Newts; bat roosts and is likely home to other protected species. Appropriate assessment and provision on the site will be required for these species.*
17. *Site design and layout should be informed by an Arboricultural Impact Assessment, with the intention of creating a sustainable juxtaposition between built development and trees. Where possible trees and woodland should be incorporated into areas of open space and planting should occur to connect to / expand adjoining wooded areas.*
18. *Development should exclude the portions of the site located in Flood Zones 2 and/or 3 and the portions of the site located within the 1 in 1,000 year surface flood risk zone.*
19. *Mineral extraction opportunities associated with the site should be investigated and where appropriate extraction works undertaken.*
20. *The site should incorporate sustainable drainage, informed by a sustainable drainage strategy.*
21. *Any other relevant supporting studies should be undertaken and their recommendations implemented*.

Our comments on each of these initial site guidelines are:

1. Housing provision should also be “future-proofed” for zero carbon emissions, for a suitable mix for the ageing population (not necessarily within its own enclave), and for a high proportion of affordable housing. It would be preferable if fewer than 1,000 houses are built on the site, partly for reasons set out below.
2. A better balance between employment provision and housing should be considered. On the Council’s calculations there should be nearer 11 Ha of employment land than the 6 Ha proposed, but if the housing numbers were reduced that disparity could also be reduced. The aim should be for the higher GVA employment sought within the EGS. However, the aim of balance is unlikely to stop cross-commuting, particularly to Telford, and investment in public transport will be needed to address that, at least in part.
3. A local centre is of vital importance and should be built in time to serve residents from the early stages of housebuilding. However, a settlement of 1,000 houses is nearly the size of Much Wenlock, so the centre should be more than a “village” centre. Even so, it is unlikely to be able to serve all local needs and good public transport links need to be in place to those other centres likely to provide the facilities that cannot be provided in the local centre.
4. Paragraph 4.4 of the Sustainability Appraisal lists some of the existing green infrastructure within the site, which has contributed to it being ranked as “poor” as a development prospect. Development on the site must protect this green infrastructure and this and new green infrastructure should be connected, including with footpaths, cycletracks, and other habitat in the area, so that a continuous network is established rather than isolated pockets of greenery.
5. Provision of adequate medical facilities/doctors’ surgery is a recurring concern of people and must be built into the site guidelines.
6. Community facilities should be part of the centre noted at c. above. The idea of tapping-in to the heritage of the site is an excellent one.
7. At the consultation event concerns were expressed about the likely inadequate nature of the existing roads and junctions for coping with maybe 2,000 extra cars on a regular basis. Upgrading and re-modelling of the existing road network, and extra access points are all likely to be needed, but a better solution would be to make sure that public transport is an attractive alternative to the private car.
8. Good and attractive pedestrian and cycle links to the proposed school and local centre are vital, as are pedestrian and cycle links to the green network.
9. The site must indeed be well connected to, and relate well to Ironbridge Gorge World Heritage site, the Severn Gorge Conservation Area and to heritage buildings. The site itself is a monument to what are increasingly considered to be the excesses of coal-fired power, with its contribution to climate change. The opportunity should be taken to build into the development some recognition of this aspect of the past, perhaps by creating a memorial park where the cooling towers stood, particularly as this is contiguous to the existing World Heritage site.
10. The Grade II listed building must be preserved by law, so should clearly be preserved in a good state. It is certainly a good idea to adaptively reuse other buildings of historical interest, which could be added to the suite of Ironbridge Gorge museums.
11. The retained National Grid and Western Power Distribution substations and equipment in the middle of the site are clearly a constraint on the free development of the site. It might be best to site commercial uses near to them rather than domestic uses, but sound insulation might well also be necessary.
12. Good landscaping is vital, particularly where there might be impacts on the nearby AONB and the contiguous World Heritage Site. The phasing of development as on the developer’s website at <https://ironbridgeregeneration.co.uk/wp-content/uploads/2019/05/Phasing-Plan.pdf> indicates that sand and gravel extraction will occur from 2020 – 2025 on most of the greenfield land, which is subsequently earmarked for housing. After the quarrying, careful landscaping of this area will clearly be necessary.
13. Any extra costs associated with dealing with contaminated land must not be allowed to be used as a reason for reducing the proportion of affordable housing on the site, or for reducing other site amenities.
14. As well as retaining the Buildwas Sand Quarry SSSI, Local Wildlife Site and Local Geological Site, Tick Wood and Benthall Edge SSSI and any other priority habitat, and providing appropriate buffers for them, they should also be connected into a green network throughout the site, and well connected with footpaths and cycle tracks.
15. The same applies to the Buildwas River Section SSSI, three Ancient Woodland sites and other Local Wildlife Sites.
16. The proposed green network linking all the above mentioned sites should also incorporate the relevant habitat for any protected species.
17. Again, the trees provided within the site should if possible be part of a connected green network rather than being isolated instances of greenery.
18. No development should take place in areas at risk of flooding and these areas should be incorporated into the green network.
19. Land where mineral extraction occurs must be carefully restored afterwards.
20. Sustainable drainage is a requirement of all development anyway.
21. Such studies should include ways that the site can contribute to mitigating climate change and loss of habitat.

Our further comments are:

* The list of site guidelines makes no mention of the railway. This should be retained and linked to the main railway network, to encourage wider use of public transport.
* The list of site guidelines also does not specifically mention bus services, although a park-and ride scheme is mentioned. The site should be designed with bus use as an integral part, to encourage wider use of public transport. It is particularly important that the internal road network is designed to be permeable, and does not rely heavily on cul-de-sacs, which favour car usage over other means of transport.
* The housing and employment land within this development must be taken to be part of the overall guidelines for the Shropshire Council area, which are presently stated to be 28,750 houses and about 300 Ha of employment land.
* The effects on Much Wenlock and Buildwas, which will be affected by such a large development on their doorsteps, must be considered. Perhaps some mitigation could be provided through the CIL raised by the scheme.
* A settlement of 1,000 houses might require more than one nursery and primary school. All schools should be sited away from heavily trafficked roads, to provide good air quality and should be easily accessible by foot, bicycle and public transport. They should also be sited well away from the retained power lines that cross the middle of the site.

***Q8. Do you have any comments on the indicative masterplan produced by The Harworth Group for the redevelopment of the Former Ironbridge Power Station?***

Yes.

Masterplans are by their nature only promises, and are prone to change. It would be desirable if Harworth and/or the Council retained control over any masterplan to ensure that all cogent contributions to it along the way, including those from the general public (particularly those local to the site) are carried through to the final development.

The masterplan as published in the consultation document gives only part of the overall picture, and makes commenting on the plans more difficult. The promoter’s website at <https://ironbridgeregeneration.co.uk/> does give more maps which do aid a better interpretation of the site, but putting them onto an Ordnance Survey background would have been more helpful than just the diagrammatic plans provided.

[**RAF Cosford**](#_top)

***Q9. Do you agree with the identification of RAF Cosford as a preferred strategic site?***

Yes, as long as the development is connected to military use.

***Q10. Do you have any comments on the proposed site guidelines for RAF Cosford?***

Yes, as below.

The site guidelines are reproduced below for completeness:

*Approximate site area 203 Ha; The ‘Defence Optimisation Programme’ has identified RAF Cosford as a ‘receiver site’. As such it is considered by the MOD to have capacity for increased MOD and associated uses. Particularly:*

* *Enhancement of RAF Cosford’s role as a centre of excellence for UK and International Defence Training.*
* *Plans for expansion of the Cosford Air Museum.*
* *Opportunities to co-locate other MOD services.*
* *Formation of the Whittle Academy by the Aviation Skills Partnership in collaboration with Telford College.*

*Identification as a preferred strategic site and proposed removal of land from the Green Belt would facilitate these uses*

1. *Existing services and facilities, including sports provision should be maintained or appropriate and proportional compensatory provision made.*
2. *Extensive areas of green infrastructure, including areas of public open space should be integrated into any development proposals. Green infrastructure provision should seek to protect and enhance the environmental network (particularly in the south and west of the site).*
3. *The site is likely home to protected species, including Great Crested Newts. Appropriate assessment and provision on the site will be required for any protected species present.*
4. *The site may contain priority habitats, these will need to be retained and an appropriate buffer provided. Any mature trees and hedgerows present should also be retained on the site.*
5. *Reflecting likelihood of increased movements to and from the site, improvements to the railway station and station car parking should be provided.*
6. *Necessary improvements to existing access points should be undertaken and any additional access points should be appropriately designed and constructed.*
7. *Appropriate pedestrian and cycle links need to be provided through the site and in particular between the main site and airfield.*
8. *The site may contain contaminated land and is in proximity of sources of odour (sewage treatment works), which will need to be appropriately managed.*
9. *The design, layout and materials of any development on the site should mitigate impact from noise associated with the airfield and railway line.*
10. *The site should incorporate sustainable drainage, informed by a sustainable drainage strategy. Development should exclude the portions of the site located within the 1 in 1,000 year surface flood risk zone.*
11. *The site contains the majority of the expansion period airfield; Grade II listed Fulton Building; and a range of other military buildings which are considered to be non-designated heritage assets. As such a heritage assessment will be required and its recommendations implemented. Site design and layout should be sympathetic to these assets and should contribute to better revealing and enhancing their significance.*
12. *Habitats Regulations Assessment (HRA) will be required.*
13. *Any other relevant supporting studies should be undertaken and their recommendations implemented.*

Our comments on each of these initial site guidelines are:

1. There should be no loss of existing services and sports provision which should be available to the general public.
2. Green infrastructure should seek to make connections with other habitat and footpaths in the area, and should not be isolated within the site.
3. The proposed green network should also incorporate the relevant habitat for any protected species.
4. As well as being buffered, priority habitats and mature trees and hedgerows should be connected to the overall green network, rather than being isolated within the site.
5. The site should be designed so that the use of public transport is encouraged and facilitated, with an emphasis on a permeable layout.
6. The use of public transport should be encouraged more widely and facilitated both at the railway station and by bus. While there may be some need to improve access by car, this should not be in the place of prioritising public transport.
7. Walking and cycling must be encouraged by enhancing the network within and around the site, and by creating external links, particularly to Albrighton, which avoid the need for short car trips.
8. Any extra costs associated with dealing with contaminated land or existing nuisance must not be allowed to be used as a reason for reducing any potential site amenities.
9. The design of buildings and the site should clearly mitigate against noise and other pollution.
10. No development should take place in areas at risk of flooding and such areas should be incorporated into the green network.
11. Any heritage assets should be minimally affected by any new development.
12. If HRA is required for this site it should be required also for the other two Preferred Sites.
13. Such studies should include ways that the site can contribute to mitigating climate change and loss of habitat.

Our further comments are:

* Commenting on the potential plans is made more difficult because no geographical location is outlined for these plans, nor any likely extent of them.
* The site area is given as approximately 205 Ha in the initial site guidelines in the table at paragraph 2.63 of the consultation document, but the separate areas given in the plan under paragraph 2.35 of the consultation document total 269 Ha. We assume that the difference of 64 Ha is the area of Green Belt within the site that is proposed to be retained.
* Any changes to the housing provision on the site may mean that existing school and doctors’ facilities may need to be re-visited.
* It is likely that further development would mean that parking capacity needs to be increased at the local railway stations. There should also be disabled access at Cosford train station

**Green Belt policy**

We are surprised that no specific question has been asked about the Green Belt aspects of this proposal.

The existing Green Belt policy for RAF Cosford is contained in Shropshire Council’s Core Strategy policy CS5 (adopted February 2011), and allows for ”*the military base and Royal Air Force Museum at Cosford to be recognised as a major existing developed site within the Green Belt where limited defence related development will be permitted”****.***

This policy for RAF Cosford has enabled development to take place there over the years without too much difficulty. Why is it therefore necessary to remove the base from the Green Belt? This carries the risk that if the military use ceases, the whole area could be redeveloped, without the protection of Green Belt status. While this is currently deemed unlikely by the Council, were the site to be removed from the Green Belt it is hard to see how that would be enforced.

The three areas north of the railway line (Accommodation, 27 Ha; Main Site, 57 Ha; and Sports Area, 17 Ha) are already largely built over. Removal of those areas from the Green Belt would not affect its openness. However, in order to preserve the openness of the Green Belt, it would seem sensible to retain in the Green Belt not only the area to the south of the runway (as is currently proposed) but also the equivalent area of the airfield to the north of the runway, perhaps within the perimeter taxi-ways.

**Other Potential Strategic Sites**

[**Bradford Estate Junction 3**](#_top)

***Q11. The Strategic Sites Consultation Document recognises land north of Junction 3 of the M54 may represent an opportunity to meet cross-boundary needs arising within the Black Country and it could deliver significant economic opportunities to Shropshire. Do you believe that land north of Junction 3 of the M54 should be identified as a preferred strategic site?***

No.

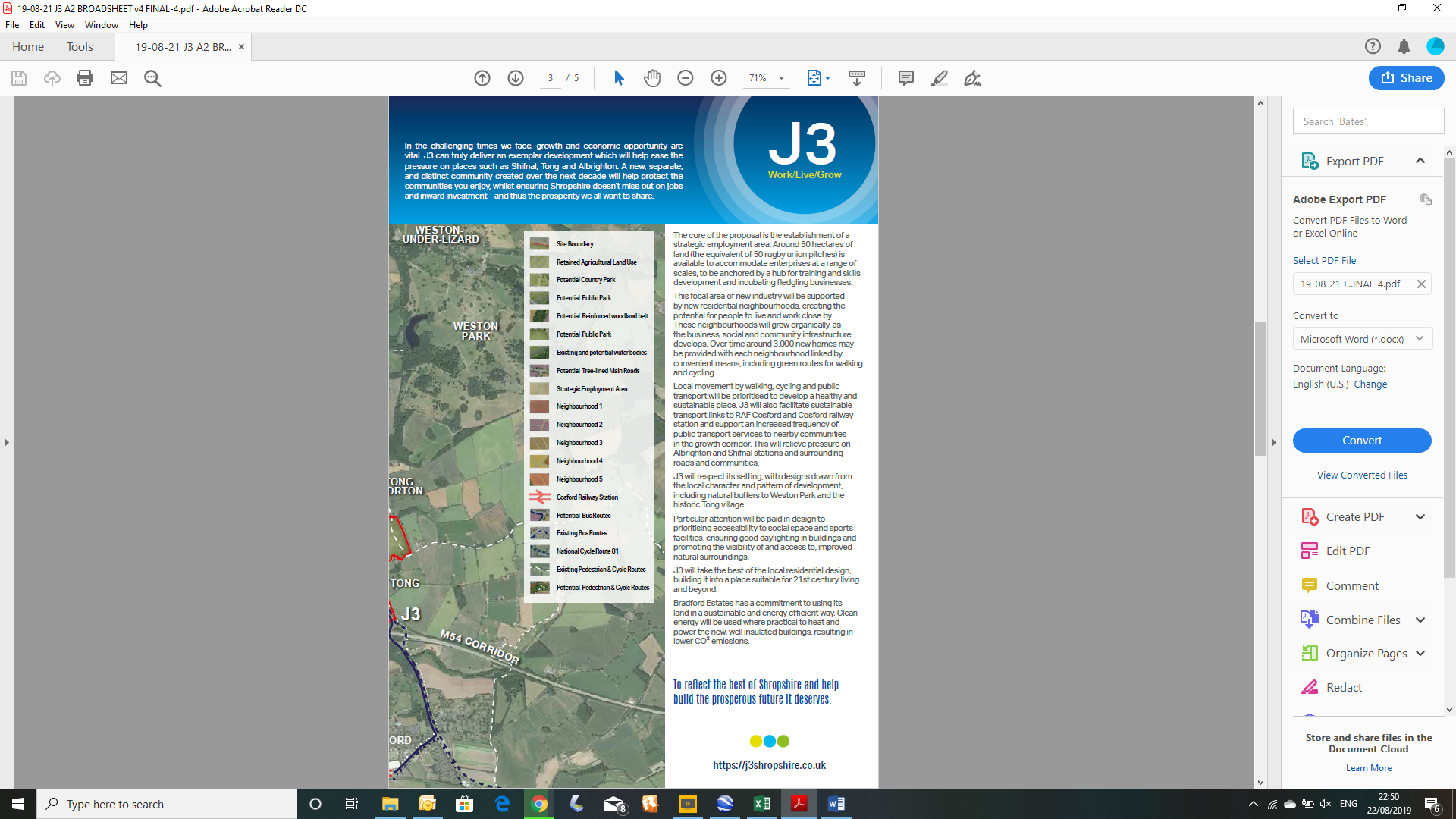
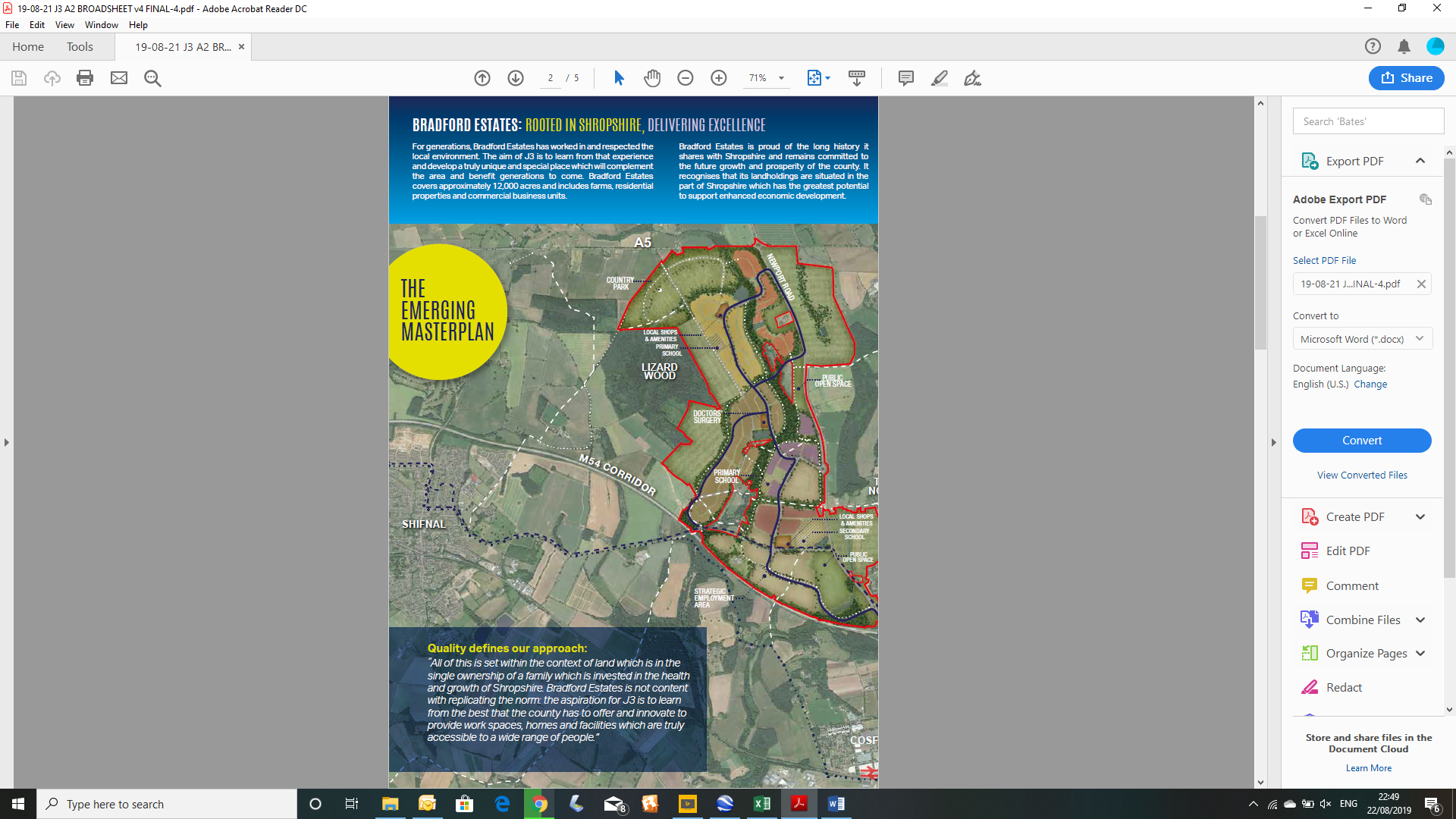
The consultation document contains only a sketchy plan for an “area of search”, supplied by the promoters, for this controversial further potential strategic site north of the M54 Junction 3. The proposal is for: a strategic employment site of around 50ha, around 3,000 homes, and a local centre as part of a planned settlement. The original proposals, submitted in December 2017, were for 10,000 houses.

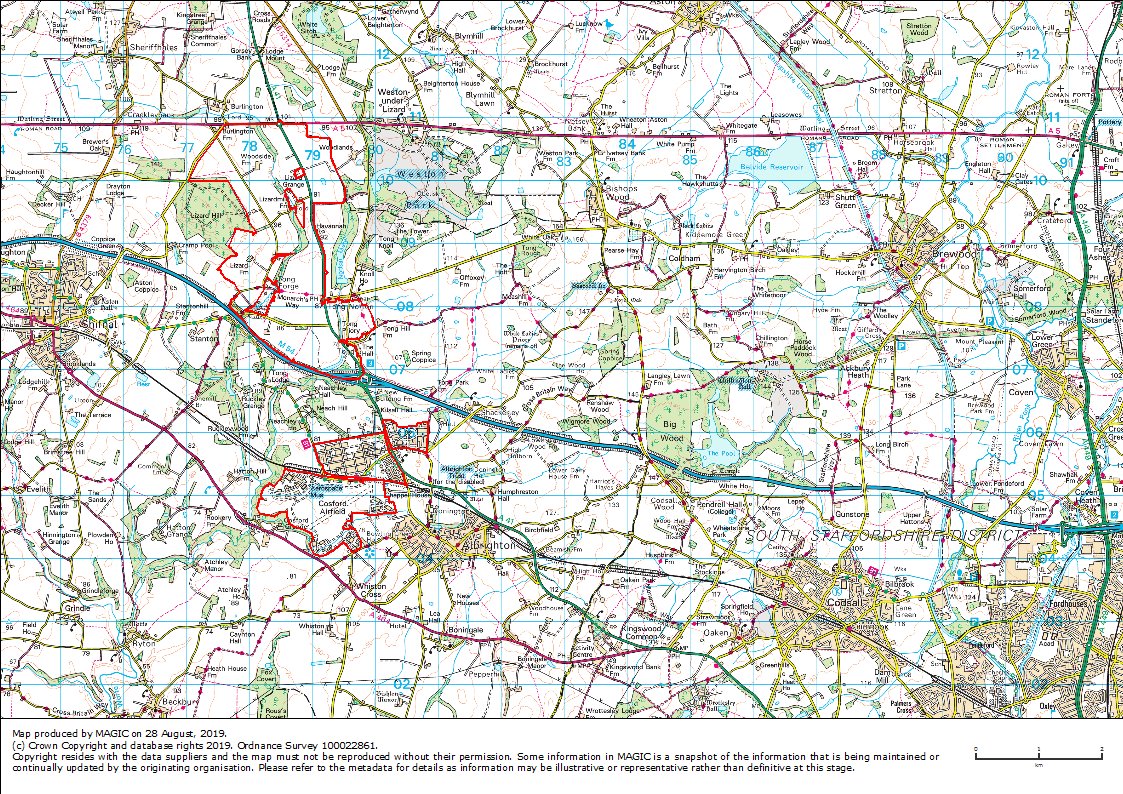
But eight weeks into the consultation, the promoters released an initial “emerging masterplan” of what they are promising. This was going to be distributed to local households after the August bank holiday but the plan within it has only become available on the promoters’ website at <https://j3shropshire.co.uk/> within the last few days of the consultation.

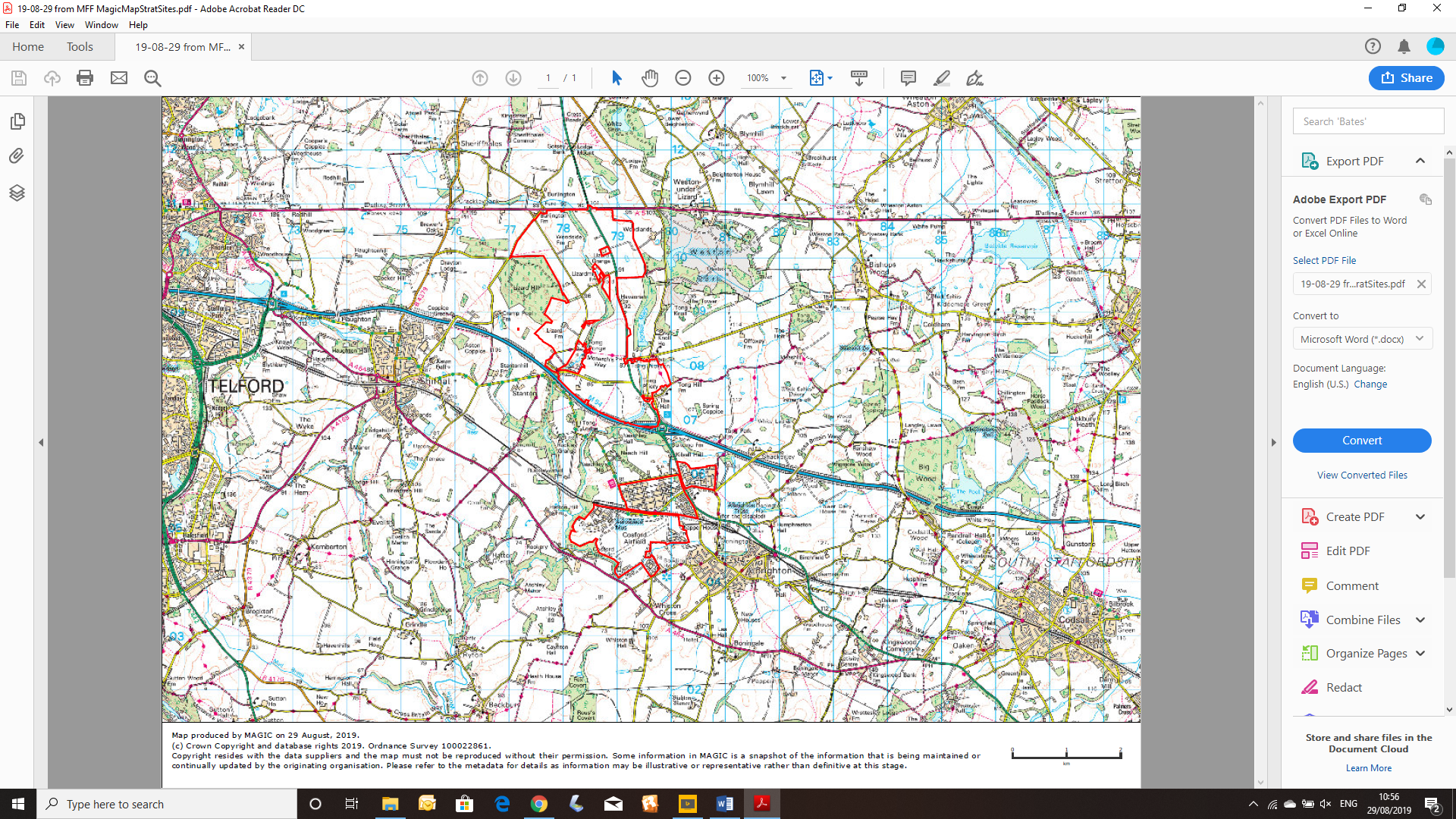
That emerging masterplan is reproduced on page 31 below, as best as we can currently manage. Further points about these plans include:

1. Masterplans are by their nature only promises, and are prone to change.
2. For any land to be released from the Green Belt there must be “exceptional circumstances”. To release the area proposed there would have to be especially good reasons, which have yet to be formally put forward. As stated above the justification in the M54 Study is considered to be inadequate.
3. Alternatives to releasing the land have not been considered or its impact on adjoining brownfield sites particularly in the Black Country.
4. In terms of employment, the “M54 corridor” is being promoted by Shropshire Council as a good area for growth to take place, because they say there is lots of demand, but there is little evidence that the Council has considered the impact of nearby competing sites such as Four Ashes.
5. This development is definitely not required to meet Shropshire’s stated needs; that is already catered for within the existing plans.
6. The area in question is good quality agricultural land which is increasingly necessary to ensure food security. Any development should not be on the best and most versatile agricultural land.
7. The detailed plans (as on page 31 below) seem to make over-generous provision for schools and a doctors’ surgery (it is reckoned that 200 houses gives 30 primary school places, and the smallest secondary school would be for 600 pupils =4,000 houses ; and that a doctors surgery might be for 10,000 people). Are Bradford Estates going to provide a philanthropic development akin to Bournville, Saltaire or Port Sunlight? Or are yet more houses planned at a later stage?
8. Paragraph 1.4 of the M54 Growth Corridor Study refers to the West Midlands SIDP and Shropshire Council’s EGS and to the *“opportunities to create a hub maximising the opportunity at i54 . . . and RAF Cosford*”. The map on page 32 below shows the wider geography of the M54 corridor from Telford to i54, Junction 2 and Wolverhampton. In reality these locations are not closely connected and any notion of a hub involving all of them would result in increased commuting.
9. The plan at page 33 below[[10]](#footnote-10) shows the extent of the West Midlands Green Belt in relationship to the Shropshire Council area. Extensive areas of this Green Belt would be better connected to the Black Country than would the J3 Bradford Estate proposal.

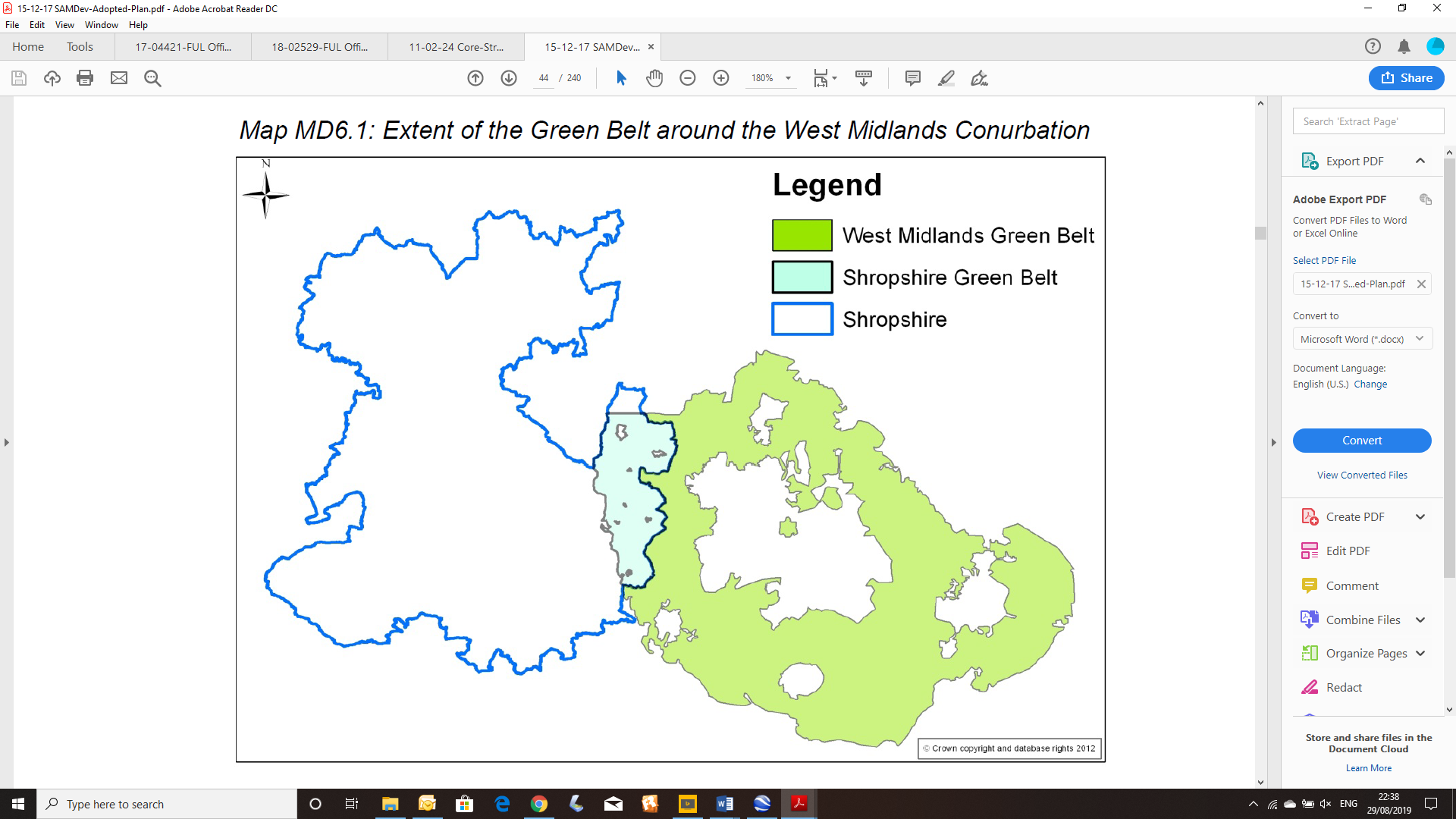
The Emerging Masterplan as now published within a leaflet distributed locally to the proposed site



The wider geography of the Bradford Estate “Emerging Masterplan”, the RAF Cosford site, and the M54 from Telford to i54, Junction 2 and Wolverhampton is shown below. The geography mitigates against the notion of creating a single *“hub maximising i54 and RAF Cosford”.*



The full extent of the West Midlands Green Belt and the part of that which actually lies within Shropshire is shown below



***Q12. What do you believe are the potential benefits associated with identifying land north of Junction 3 of the M54 as a preferred strategic site?***

None.

***Q13. What do you believe are the potential issues and impacts associated with identifying land north of Junction 3 of the M54 as a preferred strategic site?***

As outlined elsewhere in this submission.

***Q14. How might the issues and impacts associated with identifying land north of Junction 3 of the M54 as a preferred strategic site be mitigated or addressed?***

As outlined elsewhere in this submission.

## **Further information**

***Q15. Please use the space below to make any further comments on this Consultation or to suggest any alternative strategic sites***

As outlined elsewhere in this submission.

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**Appendix 1: M54 Growth Corridor – Strategic Options Study**

Report for the Campaign to Protect Rural England (Shropshire Branch)

Gerald Kells

Sept 2019

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1. **Introduction**
   1. I was asked by CPRE Shropshire to review the M54 Growth Corridor Strategic Study by Avison Young to inform their response to the local plan Strategic Sites Consultation.
   2. This report should, therefore, be read in conjunction with my previous report on the Preferred Housing Sites Consultation and the response by CPRE to the Preferred Option Stage, as well as the report I did for West Midlands CPRE on the Black Country Core Strategy Options.
   3. In particular those set out concerns about the approach to housing supply and demand and to economic development by Shropshire Council.
   4. It is also important to consider, even on its own terms, the limitations of the M54 Growth Study. The authors do not assess the cumulative transport impacts of the proposals in any detailed way, do not examine their climate change or environmental consequences of their proposals and do not consider landscape or biodiversity in any depth.
   5. There is no consideration of alternative sites in other parts of Shropshire or in neighbouring authorities, particularly the Black Country, or of the effect on brownfield regeneration, a key purpose of Green Belt protection.
   6. The consultation the study authors undertook was with a restricted group of stakeholders, namely other local authorities and economic groups. Landowners with an interest in development in that location were included but there was no stakeholder engagement with local amenity or residents’ groups, nor with transport providers or those in the business sector who might have contrary views as to where development would be best placed.
   7. Unhelpfully the report does not break down where stakeholder feedback came from. But, even so, the summary in Para 3.7 is revealing. The positives are what one would expect from those with an interest in steering development to this location but they are matched by the concerns of adjacent local authorities, as to the impact of these developments on adjoining areas, something the study does not consider.
2. **The Status of the Shropshire Plan** 
   1. The Shropshire Plan is currently subject to a partial review. It is important to stress, therefore, that the overall approach to housing need (the adoption of a ‘high’ housing growth scenario) and the assumptions about the supply of housing have yet to be tested in a public examination.
   2. Nor has the approach to economic development, and specifically the quantum and distribution of employment land provision, been tested.
   3. Not only are these factors still untested in themselves, but the use of them as justification for ‘exceptional circumstances’ is also untested.
3. **Housing Numbers Overestimate**
   1. In my report for the CPRE Shropshire response to the Preferred Sites consultation I considered in some detail the calculation of housing need and supply in Shropshire.
   2. The conclusions of that report are set out in Annex A, but broadly suggest that, when proper account is taken of overall supply, including windfalls, the level of housing proposed in the County (26,809) would exceed the standard methodology for housing need (25,260), (which itself is above the demographic need) and that this supply could be further increased if an appropriate increase in densities were pursued.
   3. As a result, there is, quite simply, no housing need which requires the allocation of large-scale housing in the Green Belt.
   4. The position of the M54 Study is to reproduce the 28,750 ‘high’ housing requirement without any caveat and then to refer to a net additional housing requirement of 10,250 based on the current completions, commitments and allocations. This is unfortunate because it suggests a much larger gap than actually exists, even when taking the Council’s own calculation, because it excludes the 4,485 for windfalls and 1,198 for accepted SHLAA sites included by the Council.
   5. In terms of the study there is no detail on how many houses would be included on specific sites, but the Bradford Estate site is aiming at 3,000 and the Stanton Road and Lodge Hill sites would also include housing. In other words, even on the Council’s assessment of 24,381 homes on the supply side, their approach would mean the shortfall would be almost entirely directed to this one corridor and to an area of protected Green Belt.
4. **Economic Development** 
   1. The economic case for the corridor is built on a number of factors. Unfortunately, the supporting evidence for these is less than clear to me. According to the study *‘The reasons for Shropshire’s comparatively poor economic productivity are well rehearsed’*. In fact, the economic evidence seems to me rather opaque. Looking back over the various local plan consultations they include assertions which I found hard to correlate.
   2. In at least one case the statistical evidence was mistaken (acknowledged by the Council themselves) and this led to the complaint by CPRE in regards to the Preferred Sites Consultation (which I do not repeat here) but which may have influenced responses to that exercise.

*GVA*

* 1. The 2017 Economic Growth Strategy sets out a goal of increasing the County’s Gross Valued Added (GVA) by 12%, but I cannot see a clear justification of how this particular figure is reached. It is certainly higher that the GVA aspirations of the neighbouring West Midlands Combined Authority (5%) which itself appears demanding.
  2. In this the economic strategy appears to have been heavily influenced by ‘The Oxford Economics Baseline Forecasts of Employment and Job Growth in Shropshire’. GVA for Shropshire is lower than the national average. One reason for this is the predominance of farming, forestry and fishing businesses, which have a comparatively low GVA, as well as significant employment in accommodation and food services.
  3. This, of course, reflects the nature of a rural county and shows (in a broader sense) the risks of relying on GVA as a measure of economic success. If one’s policy is to increase average GVA the obvious (but perverse) thing to do would be to close down those businesses, because while important, they do not have the level of GVA of other economic activity.
  4. There is also, in the Study, a reliance on a lower level of start-ups in the county compared to the wider region, but this is reflected to a large degree in a lower level of business failure, which is again comparable with the county’s rural nature.
  5. Further concern relates to the high level of commuting and an assumption that this results from the low level of unemployment in the county (something which is presumably of itself desirable.)
  6. There is, of course, a very significant problem with this analysis, in that the interventions proposed by the Council in their local plan, which is to say, providing more housing than is demographically required, would allow more people to come into the county and commute to neighbouring authorities.

*Balanced Growth*

* 1. In response the Council is proposing what it calls its ‘balanced approach’ to employment provision. This involves matching the housing growth to employment land. But, in fact, that actually covers two different and separate things.
  2. The first is the overall calculation of employment land required in the County.
  3. This is done by a simple equation:

Number of new people x average square metres each one works in ÷ 10,000 to turn it into hectares ÷ by 0.4 because only 40% of employment land is actually used for working in.

The Council’s calculation is as follows.

28,750 x 42.25sq m ÷ 10,000 ÷ 0.4 = 303.67 Ha, rounded up to 304 Ha.

* 1. On a technical point, CPRE Shropshire has challenged the figure of 42.25, because the averaging out of the various sectors is not weighted and considers 31 a better representation and this is a matter which will no doubt be debated at Inquiry.
  2. However, even if this is accepted, it does not address the more fundamental flaws in this approach. Three come to mind. Firstly, the figure of 28,750 is above the demographic need, secondly, there are many people who will move to Shropshire not seeking employment (for example, retired people), and thirdly, those who are employed may well move to Shropshire to take up occupations with no requirement for employment land at all.
  3. The second (and potentially confusing) way in which the term is used is to seek to balance where employment and housing are located within Shropshire.
  4. It is the second use of the term which is the justification for the particular M54 corridor approach, not the first.
  5. According to the Council, it is assumed that such a distribution will lead to a lower level of commuting and so reduce car dependency.
  6. This logic, however, is also flawed, firstly because it relies on the assumption that if you build houses next to employment sites people in those houses will automatically work on those sites and, secondly, because it fails to take account of all the other journeys people make, for leisure, schooling and retail activities, for example, which will be influenced (both in terms of mode and distance) by whether the development is sustainably located.

*Economic Development Opportunities*

* 1. And all of these calculations also rely on an optimistic view of economic development prospects.
  2. At the Preferred Options Stage the Local Plan considered a number of alternative options for levels of economic development and chose the high growth option.
  3. In doing so the study relied on economic opportunities it believed would be generated by proximity to a number of initiatives in neighbouring areas, principally the Midlands Engine, The Northern Powerhouse and the Northern Gateway, something reiterated in the economic strategy.
  4. CPRE Shropshire set out in its response to the Preferred Options its concerns about the realism of this. Indeed, the scale of industrial development proposed at Crewe, close to the HS2 station (see Appendix 2 from CPRE’s Preferred Options stage response), as well as improved transport links into Staffordshire, would seem, if anything, to draw investment away from Shropshire, even assuming that second element of HS2 survives the current Government review.
  5. The M54 Study echoes these claims of benefits from HS2 (1.26), which seems surprising to me given that, even if they happened, they would impact much more directly on the northern part of the county and would suggest development should be directed there.
  6. Indeed, one of the issues with the approach to economic development across the whole review process is that it relies on such initiatives, while taking little consideration of the impact of them in terms of drawing economic development away from Shropshire. If that happened additional housing would simply lead to more commuting.

*Spatial Investment and Development Plan*

* 1. Since then the West Midlands Combined Authority, along with non-constituent members, has developed a Spatial Investment and Development Plan (SIDP). This is presented in the M54 Study as endorsement by the WMCA of Shropshire’s strategy.
  2. However, this needs to be treated with care. The SIDP is a joint process across a wide area and not only are there several other corridors mentioned in the SIDP but the WMCA’s own investment programmes are targeted very specifically at corridors within the WMCA area where they are promoting brownfield development. Their aim is for 80% of development to be on brownfield land.
  3. There is further emphasis placed in the M54 study on i54 and T54 as raising the profile of the corridor. i54 was, of course, largely a brownfield site, which is directly adjacent to the West Midlands conurbation with road links directly into the conurbation. T54 is an extension of an existing business park on the edge of Telford. Both are arguably better located in sustainability terms than the other sites identified in the M54 corridor.

*Industrial Land*

* 1. In terms of providing adequate industrial land across the county, the local plan assessment in October 2017 acknowledged that there was 223 Ha of industrial land available. The strategy required 305 Ha, giving a shortfall of 80 Ha. This, of course, is predicated on the Council’s bullish approach to growth.
  2. However, some of this land was in settlements (approximately 76 Ha) where it was considered in the Council’s analysis to be ‘overprovision’.
  3. Without considering those sites in detail this must cause some concern, as it could be seen as a direct result of the ‘balanced development’ approach, leading to the reallocation of industrial land away from existing settlements and into the countryside.
  4. Another way to look at the supply question is to consider specifically the provision of larger sites. These used to be considered under regional policy guidance as regional investment and logistics sites (usually classed above 50 Ha).
  5. It is acknowledged (2.38 of the M54 Report) that Shropshire promotes a good portfolio of employment land. In other words, the M54 corridor’s assumed benefit is to deliver large sites, attractive to the market, notably the 50-Ha site promoted by Bradford Estate. I note, in this regard, that their recent leaflet stresses starter units, but, of course, there is no guarantee of this should the site be allocated.
  6. The problem with this approach to larger sites is that in real economic terms these large sites are performing a regional, rather than local economic, function and the level of provision is, therefore, best determined at a regional level, or if not, with strong cross-boundary assessments.
  7. The market for such sites will include sites in adjoining local authorities and this is particularly relevant given the geography of Shropshire where the role of the M54 corridor is more relevant to Telford or Wolverhampton than to Shrewsbury or Oswestry.
  8. This, of course, is not only an economic issue, it undermines the justification for Green Belt releases, as I discuss later.

1. **Black Country** 
   1. One further complication, before considering the corridor in detail, is the role of the Black Country and its housing and employment needs. The Options consultation for the Black Country in 2017 suggested a shortfall of housing land within the conurbation of some 24,000 homes (up to 2036) as well as 300 Ha of industrial land.
   2. In responding, WM CPRE challenged the original assumptions on both housing and employment need. The level of households was not consistent with their economic analysis (also by Oxford Economics) which suggested migration out of the Black Country to more economically attractive areas.
   3. It also underplayed the level of land that might come forward in terms of housing supply (as much as 12,500 homes potentially on derelict industrial land).
   4. Perhaps even more relevantly the industrial land shortfall was largely for larger sites but failed to include significant sites within the Black Country’s surrounding area, notably Four Ashes. Not only that but it was based on the ‘SuperSEP’ approach which, as with Shropshire, represented a bullish approach to economic development opportunities.
   5. Since then the Black Country Councils have been reviewing their calculations in advance of a Preferred Option (perhaps next year) and there is no clarity as to the up to date situation. So, it is unclear what figure they will be promoting.
   6. But even if they do have future shortfalls, there is no certainty how they (or neighbouring authorities) will respond to that. The Black Country has areas of its own Green Belt which it could consider and there are a number of other local authorities which abut the sub-region.
   7. In responding to overtures by the Black Country Authorities in Sept 2018 most adjoining local authorities were cautious about accepting their overspill until the position was clarified. For example, Lichfield’s letter says:

*‘The recent letter we received set out that the Black Country authorities are focusing on continuing a brownfield first approach. Therefore, we would like to reiterate that we consider that all options for growth including green belt release need to be fully explored, and this is in advance of seeking assistance from other authorities to accommodate housing and employment needs arising from the Black Country.’*

* 1. Telford are also cautious:

*‘In reference to your request that the Council consider its position regarding meeting some of the Black Country’s unmet housing need, in order to consider this we’d need more specific proposals and evidence regarding the quantum and type of development you are seeking Telford & Wrekin to accommodate as well as your strategy for meeting unmet need.*

*In addition to this we would need a clear indication as to how the necessary supporting infrastructure to facilitate ourselves accommodating unmet need, were this to be agreed, would be enabled and resourced.’*

* 1. Shropshire’s response is the most positive. Clive Wright, the Chief Executive says*:*

*‘We would welcome further discussions in relation to this potential as our work progresses, particularly in relation to the M54 corridor.’*

* 1. While he also acknowledged that sites in the corridor which are in the Green Belt might need to pass the ‘exceptional circumstances’ test (in fact all of them), he does not refer to any of, what seem to me, the quite legitimate concerns raised by other neighbouring councils.
  2. It would certainly be preferable to accommodate the Black Country’s growth within the conurbation and all the work being currently undertaken by the Combined Authority’s Housing Delivery Group supports that with two of their six priority corridors in the Black Country (Walsall-Wolverhampton and Sandwell to Dudley) and four of their five priority town centres (Bilston, Dudley, Walsall and West Bromwich).
  3. In other words, to assume the role of the M54 as an overspill for future growth in the Black Country appears premature, especially as it involves developments which would require ‘exceptional circumstances’ in the Green Belt.
  4. The overspill of industrial land need from the Black Country is particularly questionable given that it would already be largely accommodated by the Four Ashes proposal, even if the figures were demonstrated to be justified.
  5. It is, in fact, more likely that significant development along the M54 corridor would undermine regeneration in the Black Country.
  6. There is, of course, the specific risk that given the potential for overprovision of industrial land, and given the optimistic economic development strategies of competing local authorities, the industrial element of some sites on the M54 (most obviously the Bradford Estate site) do not materialise. This would lead to only the housing element being delivered, creating a commuter belt, the opposite of what is claimed as a ‘balanced growth’ strategy.

1. **Transport** 
   1. There are two issues that concern me about the M54 Study in terms of transport.

*Infrastructure Assumptions*

* 1. The first is the assumption about infrastructure delivered to support the strategy. These are set out in 1.26 and 1.27 of the study.
  2. I dealt earlier with HS2 which I do not consider to be close enough to this corridor to influence it significantly.
  3. The M6-M6 Toll-M54 link has been proposed ever since the Toll Road was opened but has yet to be delivered. It would resolve the connection to the Toll Road from the M54 and to the M6 North and so is some benefit but is not yet certain.
  4. The West Midlands Interchange would also have some benefits. However, it would at the same time release a large amount of competing industrial land, which would have the added attraction of direct links to a rail terminal and so undermine efforts to market the M54 corridor.
  5. The North-West Relief Road of Shrewsbury seems to me to have little influence on this corridor, even if it can be funded.
  6. The revised rail timetable to Birmingham would benefit the corridor, but many of the sites do not have immediate access to the line and it is unlikely that benefit would offset the increase in traffic related to development in this corridor.
  7. Lastly, there is reference to ‘discussions’ about a Western Orbital Motorway providing access to the M5 Junction 4a. This later proposal is not something I believe should be given any weight. Proposals for a Western Orbital have twice been promoted and have been withdrawn in the 1990s and 2000s. The impact on the environment, the traffic case and the economic impact (encouraging green field development rather than brownfield) were all cited as reasons for rejection.
  8. The Midlands Motorway Hub Study, (published in June 2018 by Midlands Connect and Highways England) promoted the idea again but met with a negative reaction from local politicians as well as Transport for the West Midlands. The scheme is not being promoted by either the Combined Authority or the Mayor. There is no active scheme being pursued by Highways England.
  9. Since a summary of the study was published, WM CPRE has been pursuing further information on the technical background via a Freedom of Information request to Highways England which is currently being considered by the Information Commissioner.
  10. Midlands Connect have not included a proposal in their recent submission for RIS2 and a follow up study into Western Access has adopted a much more holistic brief. The cost of such a motorway would be very large, perhaps £2 billion, and it would face considerable opposition.
  11. I do not think it is likely to happen in the foreseeable future.
  12. Noticeably, even if they occur, these interventions would only address longer distance travel. The road improvements, none of which are yet committed, would have implications for generated traffic, even without the proposed development in the M54 Study. They would not address the question more locally as to how people would travel.

*Traffic Generation*

* 1. Which leads me to the second issue, which is the traffic impact of development of the sites included in the M54 Study. There is no assessment in the study of whether these are sustainable locations in transport terms.
  2. There is no overall consideration of the traffic generated by these developments put together, the likely impact on the M54 itself of additional traffic or on local roads. Nor is there any comparison with alternative strategies which might be less car-dependent.
  3. There is no consideration of whether some of the sites are less desirable in terms of traffic generation or sustainable transport.
  4. It is, therefore, hard to comment in detail except to say that the location of several of the sites are not what one would consider sustainable in transport terms.
  5. In particular the Bradford Estate site is likely to generate travel by car, as it will be attractive for car commuting to Telford and the West Midlands. It is also unlikely to be able to provide comprehensive local services or be well served by Public Transport.
  6. Without a more detailed analysis it is hard to be more prescriptive, but the approach to development on this corridor needs to be considered, not only in terms of amenity and congestion but also the potential for climate change impacts. Moreover, the aging of Shropshire’s population may well impact on how many people have access to a car.
  7. I cannot see evidence that this has yet been done.

1. **Green Belt** 
   1. All five of the sites being promoted as part of the study are in the Green Belt and would have to fulfil the ‘Exceptional Circumstances’ criteria. However, the Study (and the Core Strategy more widely) presents a circular argument on this where the level of need is artificially raised to create the assumed need.
   2. In Para 2.18, for example, the Study suggests that Exceptional Circumstances include:

*‘consideration of the need to promote sustainable patterns of development, including planning for economic growth, housing need, health and wellbeing, accessibility, heritage and environmental factors.’*

* 1. This it interprets purely in the context of the Shropshire Local Plan and not in the context for which the West Midlands Green Belt was primarily designated (as is set out in Study), that is to say containing urban sprawl from the West Midlands Conurbation.
  2. Moreover, the quoted ‘exceptional circumstances’ is fulfilling the ‘balanced growth’ strategy. This represents development which, even by the Council’s own definition, is above its need.
  3. But even if that need were established, there could be developments in other parts of Shropshire or other local authorities which met that need.
  4. The study goes on to set out a balancing exercise in which the benefit outweighs the harm, that is to say it relies on the opportunity the sites represent to deliver Shropshire’s strategy.
  5. It goes on to say that:

*‘The relatively poor performance of any land against Green Belt purposes, is not in itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, better performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.’*

* 1. This, of course, goes against the approach of Green Belt Reviews, which seek to categorise land within Green Belt and the extent to which they meet the 5 purposes set out in NPPF. This statement not only brings into question the value of a review, such as the review undertaken for Shropshire Council by LUC, but opens up the scenario of land which inconveniently performs badly in a Review but is being promoted by developers being released under the auspices of ‘exceptional circumstances’.
  2. That is not to say that there are not limitations in the review approach as undertaken by LUC, and three come to mind.
  3. The first, and most obvious, problem is that Green Belt Reviews do not generally test the fifth purpose of Green Belt, which is *‘to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.’* This is for the obvious reason that this purpose generally relates to the type of development more than to the location.
  4. In this case the fifth purpose is very important because the designation of the Green Belt around the West Midlands has always been seen as fulfilling that purpose and there is a clear risk that designating sites in the West Midlands Green Belt for housing and industry will undermine that regeneration. Indeed, the study suggests that one reason for the emphasis on the M54 corridor is because other neighbouring local authorities are attracting development and growth.
  5. As the LUC Report says (para 3.62):

*‘Similar issues have influenced Green Belt assessments elsewhere. Many do not assess individual parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that one parcel of land makes a higher contribution to encouraging re-use of urban land than another’*

* 1. The second problem is that an individual plot of land is likely often either to fit the purposes 1, 2 and 4 which relate to urban form or purpose 3 which relates to the integrity of the countryside. So, the Bradford Estate site includes two parcels which have a strong impact on the countryside, whereas the site close to Telford is in a parcel which has a strong impact on purpose 2 according to LUCs. The result is that parcels rarely have a strong impact in all four areas.
  2. The third problem is that the parcelling up of land results in individual sites being considered discretely for Green Belt purposes, while in economic terms they are, as in this case, clearly linked.
  3. One important local benefit, for example, of the Green Belt along the M54 is that it stops Telford, Albrighton and Shifnal from merging (as is set out in section 4 of the LUC Report). But the impact of all five developments on that would be greater than any one in particular.
  4. So, while the use of Green Belt Reviews, such as the LUC Review, is both widespread and to some degree helpful, such Reviews do not actually quantify the ‘harm’ to the Green Belt in a way which can be simplistically balanced against the development gain, as is suggested in the M54 Study. The ‘harm’ includes broader issues including the impact on Purpose 5.
  5. To properly assess ‘exceptional circumstances’ for Green Belt releases in the M54 corridor requires, in my view:

1. that the strategy approach being undertaken, which requires Green Belt releases, is justified in terms of exceptional need;
2. that there are no alternative sites or strategy approach that could be taken utilising land elsewhere in Shropshire;
3. that other sites meeting those needs in neighbouring authorities have been fully considered;
4. that the impacts on the five purposes have been fully assessed, not just of individual sites, but of the overall development approach, including the impact on Purpose 5; and
5. that the negative impacts on traffic growth, carbon emissions, landscape and biodiversity have been addressed in a robust way.
6. **Comments on Identified Sites**
   1. I have not assessed the individual sites in detail but would make a few general comments.
   2. The balance of development being proposed varies. In the case of Site 5, the site is adjacent to an existing industrial site, and the two sites in Shifnal are also adjacent to the village itself. I do not know how accessible they are by public transport but this could be a concern and would need further detailed consideration.

*RAF Cosford*

* 1. The RAF Cosford Site is an existing Military site which includes military residential accommodation, as well as technical training facilities and a museum. It is next to Cosford Station, but not the M54. It is also close to Albrighton Village. Future plans for the site are not set out in detail in the study but intensification or expansion are options which are being considered.
  2. There have been requests to remove the site from the Green Belt. This would reduce the control over development which impacted on the open-ness of the Green Belt.
  3. In my view, without a clear idea of what might be proposed on an expanded site, it is unclear whether they would meet the ‘exceptional circumstances’ criteria, so removing land from Green Belt for that purpose would appear, on the face of it, premature.

*J3 Bradford Estate*

* 1. The J3 Bradford Estate site was originally being proposed as a new town of some 10,000 homes, far exceeding any need within Shropshire. That appears to have been scaled back and the current proposals are for a 50 Ha industrial development along with 3,000 homes.
  2. A leaflet has been published at a late stage in the consultation which sets out an ‘emerging masterplan’. As well as houses and industrial development this also includes health facilities, schools and shops, although the leaflet is careful to use the word ‘could’ in relation to these facilities.
  3. It would be a phased development of housing and employment.
  4. As yet there is no clear proposal and there will be concerns about whether the laudable aspirations of the leaflet can be guaranteed.
  5. There is an emphasis on open space, and a garden village approach, but the extent to which this impacts on the compactness of any proposal, or on the density of housing on the site, is unclear.
  6. There is also reference to improving bus services but there is a risk that would involve diverting existing services through the village, lengthening journey times.
  7. Overall the site is, in my view, poorly located in sustainability terms. Its closeness to Junction 3 of the M54 is likely to make it attractive to people either commuting into the West Midlands or into Telford. There is no direct train access and bus services are limited.
  8. RAF Cosford is not close enough to integrate with the development, and the M54 is between them so any linkage is likely to generate short car journeys.
  9. I am not convinced that the so-called ‘balanced growth’ between housing and employment on the site can be guaranteed. It largely depends on whether the industrial units are occupied. Even if they are, there is no guarantee residents will work at those sites, having immediate access to the M54 for commuting purposes.
  10. In other words, the site appears to me to be potentially both unacceptable on Green Belt grounds but also as its location fails in terms of sustainability.

1. **Conclusions**
   1. I have briefly considered the M54 Study in the context of the wider Shropshire Local Plan Review and CPRE’s stated concerns.
   2. My conclusion is that, while the Study usefully quantifies the land being promoted along the corridor, it does not produce a persuasive argument as to:
2. why the land is needed to be released;
3. why there are ‘exceptional circumstances’ to justify its release from the Green Belt;
4. why these would be sustainable locations in transport terms; and
5. what the impact would be on the landscape, biodiversity and wider environmental concerns, such as climate change.
   1. There is some confusion in my mind as to whether the corridor is being promoted simply to meet aspirations within Shropshire for their ‘balanced strategy’ of growth or is being considered in the light of the needs and opportunities of the West Midlands Conurbation and Telford.
   2. This lack of wider context particularly concerns me in the light of alternative options, not only for development to be directed to other parts of Shropshire but also to other parts of the region.

**Annex A: from Report for CPRE Shropshire on Shropshire Housing Requirement**

**4. Conclusions**

4.1 The table below sets out some of some key figures from this report. They are necessarily crude, but do suggest the Council has more than sufficient land to meet the housing requirement resulting from the Standard Methodology calculation, which is itself above demographic need.

4.2 It also suggests that assumptions, particularly about windfalls and density may be being unnecessarily downplayed and that the overall capacity (including existing sites and proposed sites) is probably higher.

|  |  |  |
| --- | --- | --- |
| Standard Methodology Need | 25,260 |  |
| Shropshire Plan | 28,750 |  |
| Total Allocations from Preferred Sites Material | 30,577 |  |
| Remove Over-allocation allowance |  | 1,827 |
| Current SLAA Allocations  (Council) | 24,381 |  |
| Current Preferred Sites Allocations  (Council) | 25,783 |  |
| Windfalls Underestimate |  | 1,245 |
| Increased Densities |  | 1,178 + |
| Current Allocations  (Recalculation) | 26,809 + |  |

4.3 In particular the options for higher densities on larger sites should be investigated before additional countryside is released.

4.4 There is a particular requirement in relation to Green Belt releases which is set out in Para 137 of the NPPF.

4.5 The lack of minimum density standards within the Plan as it stands may also need to be addressed to fulfil this requirement before Green Belt releases can properly be considered.

4.6 In my view, further work to address the issues and options relating to housing need and supply is needed before additional green field land allocations, and particularly on Green Belt sites, can be considered acceptable in Shropshire.

**Annex B: from CPRE Shropshire Response to Shropshire Plan Options**

***The Northern Gateway***

* 1. 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. Immediately next to the HS2 station at Crewe the Cheshire East High Growth area includes nearly 340 hectares (Ha) of land.
  3. 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.
  4. 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.
  5. Given such a dramatic change it is hard to do more that 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.
  6. 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.
  7. 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.

**Annex C: From WM CPRE Response to Black Country Plan Options Stage**

**Question 4 – Do you consider the employment land requirement identified for the Black Country up to 2036 in the EDNA is appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.**

No, we don’t. There is a broad range of figures for future employment need. Much of what is needed for smaller sites can be found based on the available employment land, even assuming the current trend continues. In terms of larger sites, the EDNA identifies a need for larger sites, with none currently available over 20 hectares, (although the extension to i54 in South Staffordshire would fulfil that requirement.) To meet SuperSEP requirements it suggests there is a need for roughly 300 hectares of land not currently identified, the majority for logistics. It then discounts 170 hectares of land out of 270 has total at the Four Ashes site for no obvious reasons since it is clearly within the area and would serve the Black Country. This might leave 130 hectares but even that has to be seen in the light of the SuperSEP as a wider strategy, which includes large sites such as Peddimore in Birmingham.

In our view there may be a need for a very limited release of sites over 20 hectares across the SuperSEP area and these are unlikely to be found in the conurbation but, the result of releasing very large amounts of Green Belt land in the Black Country and competing with Four Ashes, Peddimore and other existing business parks and logistics sites, (both in the West and East Midlands,) is likely to be both oversupply and underused sites, which would severely harm the countryside and encourage unsustainable patterns of travel.

**Appendix 2: Written evidence submitted by CPRE National Office: Local Plans section**

*This evidence was submitted to the House of Commons Committee of Public Accounts. They published their report “Planning and the broken housing market” on 19 June 2019*

Local Plans

1. Another government aspiration is to have full coverage of ‘up-to-date’ local plans, which CPRE wholeheartedly supports. The problem is that government continually puts obstacles in the way of achieving this aspiration, and then blames massively under-resourced local authorities for this failure.
2. Planning is a political football at both local and national levels, and while there are some staggering examples of failures to adopt a local plan – such as St Albans (since 1994) and York (since 1954) – many councils just get their timing wrong with goalposts shifting around them, often as a result of changes to national or regional policy. When contexts change, including with the availability of new evidence or a challenge to a strategy as the result of an unexpected development, local plans often have to go back to the drawing board.
3. It doesn’t help that plans increasingly are seen to need a vast monolithic book, the entirety of which must be rewritten from scratch, rather than as a collection of interrelated policies and proposals, some of which are capable of lasting for decades without the need to change.
4. Even when plans are fully adopted it is hard to keep them valid because the NPPF is so full of reasons to declare a plan ‘out of date’:

* if the national context changes;
* if the sub-regional context changes;
* if the plan hasn’t been reviewed in 5 years;
* if the council can no longer demonstrate a 5-year supply of housing land (which means housebuilders haven’t applied for planning permission on the sites identified in the plan); or
* if the housebuilders haven’t bothered to build the homes for which they do have planning permission.

1. If any of these apply, then developers can claim that the plan is to some extent invalid, and this in effect removes the community’s ability to manage development in its area. Few of the above are actually in the control of the local planning authority, and, strangely, nobody views the fact that housebuilders aren’t applying for planning permission on allocated sites or building homes as being an indication that, perhaps, there isn’t the level of housing need/demand in the area that had previously been thought.
2. It is an expensive and time-consuming process to even attempt to produce a local plan, largely as a result of the requirements of the process imposed by government policy and guidance. Analysis of monitoring data from the planning inspectorate shows that in the seven years since the first NPPF was published in March 2012 the average length of time taken to finally adopt a Local Plan (also often referred to as a Core Strategy) following the ‘publication stage’ has been 25 months, and was 28 months in 2018/19. This is an increase from an average of just 11 months in the three years prior to the first NPPF being published in 2012.[[11]](#footnote-11) This, combined with the ease with which plans can be invalidated or simply be set aside for arbitrary and unpredictable material considerations or similarly arbitrary and unpredictable permitted development rights, conspires to cause many local authorities to question the need for having a local plan in the first place.
3. All of the above negates the aspiration to have full coverage of up-to-date plans.  Given that this aspiration is a central plank of the conditions government considers to be necessary to support the delivery of 300,000 homes per year, CPRE considers that serious action needs to be taken to properly address the preparation and adoption of local plans, as the current regime is not delivering value for money or achieving its intended outcome.
4. In order to address this, CPRE would recommend that the Committee has regard to recommendations 3 to 5 of the [Raynsford Review of Planning](https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=30864427-d8dc-4b0b-88ed-c6e0f08c0edd) (pp.90-93).
5. One of the key reasons why local plans are declared out of date so easily is the simplistic and uncompromising approach to housebuilding targets.
6. The intention of national planning policy is that councils receive their assessment of local housing need figure, indicating the approximate scale of housing need in their area, adds in any consideration of overflow from nearby areas, and then they balance this with the availability of suitable development sites (that aren’t protected by other policies in the NPPF or aren’t needed for other reasons) and a realistic assessment of the deliverability of development in their area.
7. No council would surely choose to set a housebuilding target higher than is realistically deliverable: that would be setting themselves up to fail. Indeed, the NPPF appears to suggest in para 35(c) that plans should not be declared ‘sound’ if they are not “deliverable over the plan period”. Nonetheless many plans, even after examination, do set targets for housebuilding, well in excess of any evidence of what is achievable, either in terms of the capacity or willingness of the construction industry (which is always assumed to be infinite) or in terms of the availability and deliverability of specific individual sites.
8. In addition to the headline number of homes, councils also assess what kinds and sizes of households need homes in their area, and what sizes, types and tenures of homes need to be provided. They carefully match the mix of housing types to the available and suitable sites, taking account of the viability of development, and they plan for the infrastructure that will be needed to support these homes. Some (many, perhaps) developers work positively with this process, investing considerable time and resources in doing so, and everything looks just fine: the council is able to submit what looks like a sound plan for examination, and possibly even adopts it.
9. The problem is that the target that councils are assessed against (either the council’s own local plan housing requirement – which may or may not actually be realistic – or, if the plan has not yet been adopted or has been declared out-of-date, the assessment of local housing need figure) is just a simple number of homes. When councils are assessed (and it is the councils who are assessed, not the housebuilder) against these targets, it is just the headline number of homes built against the headline target that matters.
10. The proportion of affordable housing delivered in new developments does not matter. Nor does the actual number of local people who have been housed. Nor does the provision of jobs and infrastructure, or the application of any other government policy contained in the NPPF, including the protection of Green Belt, recreation land, heritage or protected landscapes, all of which are legitimate expectations of the local community, and just as important to them as the provision of new homes.
11. It also doesn’t matter who has got planning permission for homes or who has built them or where they have been planned or built. As far as both targets and the payment of New Homes Bonus money are concerned, houses that don’t meet local need on a speculative non-plan-compliant site are just as valuable as the affordable houses on a community-led brownfield scheme that are no longer viable as a result of the speculative proposal would have been.
12. If a council has identified a site in its local plan for 500 homes, and carefully planned for a particular mix of family homes and flats including a variety of affordable tenures, with a primary school and a bus service and so on, and the developer comes along and proposes to build instead 500 executive homes with no school, no bus service and a reduced affordable housing provision, the council has the choice of granting planning permission, and maintaining its 5-year supply of housing land, or refusing permission and risking invalidating its local plan, thereby opening the floodgates to speculative development, with the outcome that actual local housing need may not be met at all, and all of the effort put in to planning for the needs of real local people will have gone to waste. This phenomena was highlighted in CPRE’s 2014 report, *Targeting the Countryside**[[12]](#footnote-12)* and a quick scan of the specialist planning press suggests that it remains a problem.
13. CPRE considers that this perverse situation could be remedied in two simple respects:
    1. Councils should be required to be able to demonstrate a 5-year supply of housing land in terms of sites identified in local plans, neighbourhood plans and on brownfield registers (part 2), as well as sites with planning permission. The burden of proof on deliverability of these sites should be reversed, such that it is assumed that all these sites are deliverable within 5 years, unless the landowner/developer declares that they are not (in which case it should be reasonable to revoke the planning consent).
    2. The housing delivery test should be completely excised from the NPPF and planning practice guidance, since it penalises councils and communities for the failures of housebuilders.  It’s worth noting that it also adds an enormous amount of unnecessary complexity to the NPPF and practice guidance.
14. In addition, better data is essential in monitoring and understanding how policies are working. Brownfield land registers are starting to show the way on building open data; and this work must be continued and developed for other areas. For example, statistics on affordable housing and total housing delivery or not directly comparable with each other due to different methodologies making it impossible to evaluate precisely the proportion of affordable homes being delivered; and no simple way, such as a public database, of understanding whether or not a local planning authority has a five-year land supply or even an up-to-date local plan.

*April 2019*

1. See *Shropshire Local Plan Review ’Strategic Sites’: Consultation Plan* (2-page document), page 1, third paragraph (at <https://www.shropshire.gov.uk/media/12889/consultation-plan-strategic-sites.pdf>) [↑](#footnote-ref-1)
2. Second paragraph of the same document, repeated on page 1 of the main consultation document. [↑](#footnote-ref-2)
3. Written response to CPRE question to Place Overview Committee on 5 September 2019 [↑](#footnote-ref-3)
4. Written response to CPRE question to Place Overview Committee on 5 September 2019 [↑](#footnote-ref-4)
5. See <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=30864427-d8dc-4b0b-88ed-c6e0f08c0edd> [↑](#footnote-ref-5)
6. See <http://www.investinshropshire.co.uk/wp-content/uploads/2019/03/INVSHROP_SITEMAP-for-uploading.pdf> [↑](#footnote-ref-6)
7. Written response to CPRE question to Place Overview Committee on 5 September 2019 [↑](#footnote-ref-7)
8. This is not strictly true. The SA document was created on 17/6/19 whereas the consultation response analysis from the previous ‘preferred sites’ consultation phase became available on 10/6/19 [↑](#footnote-ref-8)
9. Phrase used in written response by officers to CPRE questions put to Cabinet on 12 June 2019 and to Place Overview Committee on 18 July 2019 [↑](#footnote-ref-9)
10. Reproduced from page 44 of SAMDEV [↑](#footnote-ref-10)
11. Data from <https://www.gov.uk/guidance/local-plans#monitoring-local-plans> [↑](#footnote-ref-11)
12. CPRE. 2014. <https://www.cpre.org.uk/media-centre/news-release-archive/item/3724-planning-loophole-causing-glut-of-house-building-in-the-countryside> [↑](#footnote-ref-12)