

CABINET
20 MARCH 2019
PUBLIC QUESTION TIME

Submitted on behalf of CPRE Shropshire by Charles Green, 18/03/2019

The question concerns Agenda Item 12: the *Shropshire Local Plan – Strategic Development Sites*

We make six brief points in leading up to our question.

Firstly: Paragraph 3.1 of the Cabinet paper mentions the “step change” of the Economic Growth Strategy, which is one of the main drivers of the Local Plan Review. The policy effect of this is that 305Ha of additional employment land is said to be needed. Calculations submitted by CPRE for the very recent consultation on the Local Plan Review, based on Shropshire Council’s own figures, indicate that only 141Ha might be needed.

It has been acknowledged by its architects that Shropshire Council’s Economic Growth Strategy has not been subject to any Sustainability Appraisal.

Schoolchildren around the world are holding governments to account for not doing enough to tackle climate change. Shropshire Council has not cottoned on to this imperative yet, and carries on regardless with its growth plans in the face of these climate change issues. Last month, IPPR, the very firm behind the Economic Growth Strategy, published a report entitled “*This is a crisis: facing up to the age of environmental breakdown*”. Its headline is that “*the historical disregard of environmental considerations in most areas of policy has been a catastrophic mistake*”.

Secondly: Today’s Cabinet paper carries the heading **Strategic** Development Sites. If the three sites were indeed strategic they would have been part of the overall strategy from the outset. They are not strategic; rather, they are three large, extra sites that are being promoted, and are only now being tacked onto the Local Plan Review. If these sites are to be included in the Local Plan Review, their contribution to housing and employment numbers should be counted as part of the existing preferred targets.

Thirdly: two of these large sites are brownfield in nature (although it should be noted that the Ironbridge site has 100 acres of greenfield land, in a minerals safeguarding area, on which houses are planned to be built). But the third site, on Bradford Estate land near Junction 3 of the M54 is firmly within the Green Belt.

Government policy attaches great importance to Green Belts (NPPF para 133) and requires that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified (NPPF para 136).

Shropshire Council has yet to evidence and justify these exceptional circumstances for removal of land from the Green Belt (including the proposals within the Preferred Sites consultation), yet is pursuing these avenues nevertheless in the absence of such proven exceptional circumstances.

Fourthly: The Office for National Statistics' latest projections are that there will be another 20,400 people in Shropshire between 2016 and 2036, through immigration. The Council's plans, including those within today's Cabinet papers, might well mean an increase of around 76,000 people in Shropshire's existing population of 314,000 over that 20 year Plan period. That's a 24% increase in population, some 4 times the ONS projection.

Fifthly: We understand from press reports that Mark Barrow is already booked to promote the three sites in today's Cabinet paper, at the Midlands Development Conference on 23rd May. Also, the West Midlands Combined Authority's Spatial Investment and Delivery Plan of July 2018 says that as a result of detailed discussions with authorities (which have not been made public), these three sites have been included as sites 20, 24 and 26 within the plan. These facts make today's decision look like just a rubber stamp on something that has already been decided on elsewhere, without consultation.

Sixthly: Today's paper (paragraph 5.8) says that the latest evidence indicates that the Black Country cannot accommodate all of its identified development needs within its urban area. The Black Country figures are out of date, and Shropshire Council should not be contemplating the release of land for a need which has yet to be tested, particularly when the Black Country is currently engaged in a call for sites. Furthermore, the Government has just released the latest Housing Delivery Test figures. The West Midlands area as a whole has delivered 138% of its requirement over the last three years which is nearly 20,000 more than required. Shropshire and its nine neighbouring English Local Authorities have delivered 188%, which is over 15,000 more than required.

So our question is:

What is this latest evidence of Black Country unmet need, where is it published and, in view of the six points we have made, should Shropshire Council be courting the Black Country to take any of its unmet need when the figures have yet to be tested, and should it be courting developers, rather than looking to what is needed by Shropshire's existing residents?

We look forward to hearing your debate of these points when you come to address item 12 on the agenda.

Response

1. References in the report to unmet development need from the Black Country are taken directly from a response to the recent consultation from the Association of Black Country Authorities (ABCA), a copy of which will be supplied to CPRE.
2. The Black Country Authorities are assembling evidence to support the review of their existing Core Strategy and this includes a range of technical housing evidence and an urban capacity study, all of which are publicly available on their web pages.
3. Shropshire Council is not 'courting the Black Country'. In fact, the Black Country Boroughs wrote to all neighbouring authorities, including Shropshire Council, on 12 July 2018 asking them to consider whether they would be able and willing to accommodate any unmet development needs arising from the Black Country. A copy of this letter will be supplied to CPRE. As para 5.8 of today's report explains, national planning policy guidance requires Shropshire Council to consider whether it is practical to help address any unmet need from neighbouring areas.
4. Neither is Shropshire Council 'courting developers'. All three of the strategic sites being considered have been promoted by their respective landowners as a normal part of the Local Plan Review process. National planning policy requires Shropshire Council, as part of its Local Plan, to engage with developers to explore how best to meet Shropshire's development needs for an extended period. The strategic sites which have been proposed have the potential, subject to further investigation, to contribute positively to this objective.