

CABINET 12 FEBRUARY 2020

PUBLIC QUESTION TIME

Item 14 – Shropshire Local Plan – Update on Preparation Timetable

8.Charles Green on behalf of CPRE Shropshire: (attending)

The proposal before you is a further significant moving of the goalposts of the Local Plan Review. The review period is to be extended by 10% i.e. two years, and it is proposed that a whole new raft of evidence be produced that has not been seen before. These are substantial changes which have not been the subject of any of the previous four rounds of consultation to date. Although these four previous consultations have been “informal”, Regulation 18 consultations, members of the general public understandably expect that their voices have a proper opportunity to be heard over the subject matter of the Local Plan Review. Regulation 18 is specifically there so that people can make representations about what should be in a Local Plan, before it goes to the formal Regulation 19 stage.

So our first question is:

Question 1: In view of this considerable change in what the Local Plan Review covers, will there be another Regulation 18 consultation?

If there is not to be another such consultation then it seems equitable that greater time should be allowed for people to consider all these proposed changes. The last two consultations have been for ten weeks. So our second question is:

Question 2: If you think that not having another Regulation 18 consultation will not be considered “unsound” by the eventual Planning Inspector will you at least allow that the Regulation 19 consultation should be for 10 weeks at the very minimum, particularly as it is now likely under the current proposals to stretch into the summer holidays?

Officers have had over three years since the start of this Local Plan Review consultation to amass the necessary Evidence Base, which already approaches 7,000 pages of documents. Yet they are now asking right at the end of the planned timetable for another two to four months to complete substantial new evidence that has never been seen before. In fact at least four reasons are put forward for the requested delay in the timetable, namely:

- i) To take account of the Council’s emerging response to Climate Change;
- ii) To ensure the robust evidence base;
- iii) to allow for the unanticipated impact of certain significant development proposals, and
- iv) to take account of recently announced changes to national planning policy

So question 3 is

Question 3: (A) can each piece of proposed evidence be listed now, with an estimate of the size of each relevant document; (B) can it be added to the existing Evidence Base as it becomes available, rather than all being published in one giant dollop in May; (C) can you say what the significant development proposals are whose impact has not been anticipated; (D) can you say what are the recently announced changes to national policy referred to; and (E) can you say when the next Authority's Monitoring Report (which is already over two years behind schedule) will be published, and will you correct the calendar (which incorrectly indicates it have been published in December 2019)?

All this delay highlights the fact that your Planning Policy team is under-resourced and is under extreme pressure. It is a small team being tasked with a huge amount of work, made worse by Adrian Cooper's recent move to the important role of Climate Czar. This is the second time that the timetable has had to be delayed because of the size of the task.

So **Question 4** is: Why on earth haven't you employed more Planning Policy staff?

Question 1

Response: The proposed change to the plan period to 2038 responds directly to paragraph 22 of the National Planning Policy Framework which states "Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure." It is not considered this is a considerable change, and instead is a move to further ensure the 'soundness' of the Local Plan at Examination.

Regarding the issue of evidence, the preparation of a Local Plan is an iterative process which should be responsive to public comments and emerging evidence base documents and wider material considerations throughout. The outstanding evidence base is largely to inform Development Management policies, and is unlikely to lead to any more significant changes to the principles of the overall Local Plan. It is therefore not considered that a further regulation 18 consultation stage is necessary.

Question 2:

Response: The proposed LDS proposes that the formal period for consultation on the Pre-submission draft of the Local Plan should be six weeks, in line with the minimum requirements set out in the Town and Country Planning Act. It is likely this period will run between the end of May until the start of July 2020. This timeframe is considered to be sufficient to allow local communities a meaningful opportunity to comment on the draft Plan. In arriving at this conclusion it is noted there have been four stages of public consultation on the Local Plan Review since 2017. These consultations have generated significant levels of public response, predominantly on proposed site allocations. However, should it subsequently be considered that the Pre-Submission version of the Local Plan has changed sufficiently from earlier consultation stages, the Council will consider extending the Regulation 19 consultation on the pre-submission version of the Local Plan later this year.

Question 3:

Response:

A)The outstanding evidence consists of: Green Infrastructure Strategy; Water Cycle Study; Strategic Flood Risk Assessment (Part 2); Economic Development Needs Assessment; Gypsy and Traveller Needs Assessment Update; Town Centres Study; and the Development Viability. At this stage it is difficult to judge the length of these documents. B)They will be added to the Evidence Base pages of the website as they are finalised C) The two additional reasons for programme change you refer to are included under paragraph 1.6 of the LDS document itself. Unfortunately these reasons relate to an earlier iteration of the LDS and will be amended from the proposed updated version of the LDS if agreed. For clarity the rationale for proposing an extension to the timeframes relates to the need for the Local Plan to be supported by a full range of robust evidence base material and has been allowed an opportunity to respond to emerging corporate priorities, in particular climate change. E)The AMR will be published at the earliest possible time, and the calendar will be updated accordingly.

Question 4

Response: The Local Plan Review is a key priority for this Council. We have a strong Planning Policy team made up of very good professional staff. We are not going to be drawn into the numbers of officers in the team, we are managing the resources appropriately within the financial envelope of the service. Additional interim resource has been put in place.

9.Question from Malcolm Andrew and Brenda Sandilands (one or both will attend)

On behalf of Trefonen Rural Protection Group Management Committee

We note the delay to presenting the Draft Final Plan to Cabinet and the reasons stated for this. With the transfer of Officers at a key stage of the Review and the additional workload of both Strategic Sites and Climate Change the small officer team are clearly under extreme pressure.

As raised to Full Council on 19th December 2019, our concern is that work on the Review is being properly resourced by the Council, to allow the Plan to be properly and soundly prepared so that the whole county is not put at risk of an “out of date” Plan if there are further delays.

Evidence Base – we hope that the additional time will allow the Hierarchy of Settlements Table 10 evidence to be reviewed, updated and all inaccuracies removed. Unfortunately the flawed original version has influenced both the designation of settlements and, crucially, the relaxation of Community Hub criteria.

Q1. Can the Cabinet confirm that the Local Plan Review is being properly resourced with adequate officers and support to ensure that all aspects of evidence base detail are accurate, and policy wording amended accordingly; whilst still maintaining the programme to adoption?

Climate Change – clearly this is a major factor that must be considered in a Development Plan running until 2036/38.

We note Para 5.1 says that the Plan will “include a distribution of development which seeks to reduce the need for travel by private car”.

We would again refer to the fundamental flaw of relaxing the original Community Hub criteria that required both employment and peak time public transport in settlements proposed to become Community Hubs and associated housing development. Development in settlements without these is inevitably going to lead to an increase in private car use and is therefore incompatible with the climate change emergency aims of the Council.

This applies to several rural settlements across the county, but specifically with regard to the proposed designation of Trefonen as a Community Hub we would reiterate that our village has neither employment nor peak time public transport. We cannot see how it could be considered to be a “sustainable location for development” with a guideline of 55 additional new houses.

Q2. Can the Cabinet confirm that the proposed development status of all settlements proposed for development will be reviewed and amended to accord with the Council’s adopted Climate Change Emergency Policy?

New Housing Guidelines - regarding any increased guidelines due to the 2year Plan Period extension, at what point will communities be informed of these for their settlements and how will they be able to comment on any amended proposals?

Formal Consultation - We note in Para 6.5 that it states there is “limited opportunity...to proactively make changes” to the Final Plan after the Stage 19 Consultation. Is this “consultation” purely a “rubber stamping” exercise with statutory consultees? Will the voice of residents be disregarded under the peril of any

(further) delay risking an “out of date” SAMDev Plan and the associated “free for all” development scenario?

Q1 Response

Response: Yes the Local Plan Review is being resourced appropriately and we have a strong team made up of very good professional staff.

Q2 Response

Response: It is confirmed that all Cabinet Papers are now subject to consideration of their impact on the four stands of the emerging Climate Change Strategy, and the Local Plan Report, now proposed for May, will adhere to this new process. The comments on the Council has sought to identify Community Hub settlements is noted. Although the paper before Cabinet today does not deal with the actual content of the Local Plan Review, it is nevertheless worth reiterating that the Council’s agreed methodology for identifying Community Hub settlements is designed to identify the most sustainable rural settlements by virtue of range of services and facilities. The Council will be updating this process ahead of May in responding to the most up-to-date information, and a revised ‘Hierarchy of Settlements’ document will be published alongside the Draft Local Plan.