

CPRE comments on West Midlands consultation with Article 4(4) authorities

The Campaign to protect Rural England (Shropshire branch) have read with interest the Section 4(4) Authorities Brief from the Regional Planning Body concerning the Phase 2 Revision of Regional Spatial Strategy. We note that the Regional Planning Body is committed to working in an open, inclusive and transparent way and that Strategic Authorities are expected to operate in a similar manner. We therefore outline below our views on the matters raised and ask the County Council to take them into account as well as to forward them to the Regional Planning Body with their response due in by 15th May, 2006.

General

We fully support the “step-change” policy of Regional Spatial Strategy, which seeks to improve the quality of life in the Metropolitan Urban Area and to stem, and eventually to reverse, net outward migration into the countryside. We are therefore disturbed by the prospect of increased housing levels above the RSS figures, since this would undermine that policy. Moreover, it could lead to a situation where the MUA’s were unable to absorb higher housing levels proposed by the government, resulting in severe impact on the environmental quality of both the urban area and the shires, where greenfield land would have to be developed.

RSS Review Phase 1 – the Black Country

We understand that Phase 1 of the review proposed housing levels based on RSS allocations before the government’s call for increased housing provision arising from the Barker report and recently published household projections. In our view, levels for the Black Country should be open to adjustment in Part 2 of the Revision to take account of this in order to ensure an equitable distribution throughout the region.

A Question of Balance

CPRE Shropshire accepts that the county’s economy should continue to grow, that there will be a need for more housing and that employment opportunities should be provided for the local population. At the same time, RSS recognises the need to protect and where possible enhance the environmental heritage. This is also one of

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Shropshire County Council's objectives; the county's built and natural heritage are a unique asset and must be protected. It is therefore a question of balance between two objectives and in formulating its response to the consultation, the county council should pay heed to the environmental considerations at paragraphs 11.1 and 11.2 of the paper.

Housing levels

The consultation paper postulates two reference points for determining housing levels:-

- A. Rolling forward the RSS proposals to 2026
- B. Adding 25% to levels at A

We understand that a third reference point has now been proposed - A+51%. The figures for Shropshire County and Telford & Wrekin would appear to be:

	A	B	C
Shropshire	24,900	31,125	37,350
Telford & Wrekin	<u>23,800</u>	<u>29,750</u>	<u>35,700</u>
<u>Combined total</u>	<u>48,700</u>	<u>60,875</u>	<u>73,050</u>

The combined figures for Shropshire and Telford must be considered together since the two authorities lie within the same geographical area and impact on the total environment as well as affecting policy issues such as waste and transport. We challenge these figures as a reliable basis for drafting housing allocations for three reasons:

1. It cannot be assumed that migration levels (international and inter-regional), nor household formation trends will continue over the plan period at the levels on which the allocations are based.
2. The system suggests a return to the discredited "Predict and Provide" methodology rather than the "Plan, Monitor and Manage" approach enshrined in RSS, Chapter 10.
3. The housing projections, by the government's own admission, take no account of policy. We have a strong, clear planning policy in the region and it is important to give it time to work and to stick to it.

General considerations (paragraph 12.5)

- a) It would be possible to accommodate housing levels under (A) and, subject to local constraints, most of (B). The levels under (C) would conflict with other policies and do such environmental harm as to be unacceptable.

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- b) Implementation. Under Shrewsbury's draft LDF, the town's share based on Structure Plan distribution is raised from 32% to 42%, with a corresponding reduction in levels for other districts. The latter could have their annual allocation restored to the Structure Plan quotas.
- c) Shortfall should be met on brownfield land, predominantly in the MUA's
- d) Shropshire County Council should not accept the higher levels implied in reference point C because of their inevitable impact on the natural and built environments and unsustainability in relation to other policies.

Communities of the future

- 1. RSS should plan for a housing figure lying between reference point A and point B.
- 2. Levels of development should vary within the RSS timescale to reflect changes arising from the monitoring process.
- 3. The concept of providing housing in areas of high demand should be challenged. Demand is linked to environmental quality and meeting it will cause greater impact and engender unsustainable traffic movements between Shrewsbury and regional employment centres. The approach should be to enhance the quality of other areas through the planning process.
- 4. Housing development should be distributed throughout the Shropshire/Telford & Wrekin area to take account of demand, paying heed to local environmental constraints and linking it to employment opportunities rather than accepting unsustainable traffic movements.
- 5. –
- 6. Affordable housing should be provided to meet proven **local** need, through a range of channels – planning conditions, using lower thresholds, Housing Corporation funding, small scale exceptions in rural areas, etc Account also needs to be taken of environmental constraints, such as the AONB which restricts development in areas such as Church Stretton. Final formulation of affordable housing policy should await the forthcoming report of the Affordable Housing Commission.
- 7. –
- 8. Shropshire has done well to increase the proportion of development on brownfield land. Its existing target in RSS is 59% (53% for Telford and Wrekin). While we accept that some greenfield land development is inevitable, these targets would be unattainable if the level of house building were to increase substantially. The consequences would be more greenfield development, with pressure on the Green Belt and the AONB, impact on

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high quality landscape, loss of character in small towns and villages, increased congestion on roads, particularly in Shrewsbury, and increased air and noise pollution.

Prosperity for All

The allocation of employment land should be planned sustainably – supply to meet locally generated demand, particularly from existing enterprises wishing to relocate.

Sub-regional foci

The Phase 2 Review Project Plan seems to suggest that areas other than the Sub-Regional Foci may be added, in effect undermining the original RSS concept of five towns being identified at paragraph 3.9. The respective roles of these five has been the subject of a technical study, examining also the needs of their surrounding areas and their relationship with outward migration from the MUA's. Given that two of the foci are within twelve miles of each other in Shropshire (Shrewsbury and Telford), the details and recommendations of this study are particularly relevant and it is difficult to see how their roles can be planned for the next 20 years without the results of that study being taken into account. We believe that it may be desirable to abandon a one-type approach to these centres, but rather to consider the future roles of all cities, towns and villages. In any case we think that the role of Shrewsbury as a sub-regional focus should be reviewed because of environmental constraints.

Transport

The Review includes Road User Charging policy. We do not believe there is currently adequate information to inform a view on this in regard to Shrewsbury. However, the current TIF bid would link this to a Shrewsbury North West Relief Road. We are fundamentally opposed to that proposal, which would have large impacts on the landscape around Shrewsbury. We would be opposed to any support for that proposal in RSS.

Quality of the Environment (paragraph 11.2)

In conclusion, we draw attention to the Quality of the Environment section at 11.2 and urge that serious attention be given to this section. All responses to the questions in the paper need to be carefully measured against these important environmental criteria..

May 2nd, 2006.