



**Consultation on Shropshire Council's
Draft Economic Growth Strategy
2017-2021**

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

April 2017

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1. Introduction

Q14 to 26: Respondent information

- 1.1. CPRE Shropshire welcomes the opportunity to respond to Shropshire Council's Draft Economic Growth Strategy 2017-2021.
- 1.2. We believe this is an important opportunity to shape the future of the County.
- 1.3. Relevant contact details are given in the covering e-mail submitted with this document. This submission is made on behalf of CPRE Shropshire which is a registered charity run by volunteers, with one part-time employee. Please send us a copy of the Consultation Feedback report (Q14).

Q1 to 13: Questions on Priority Actions 1 to 6, and other comments

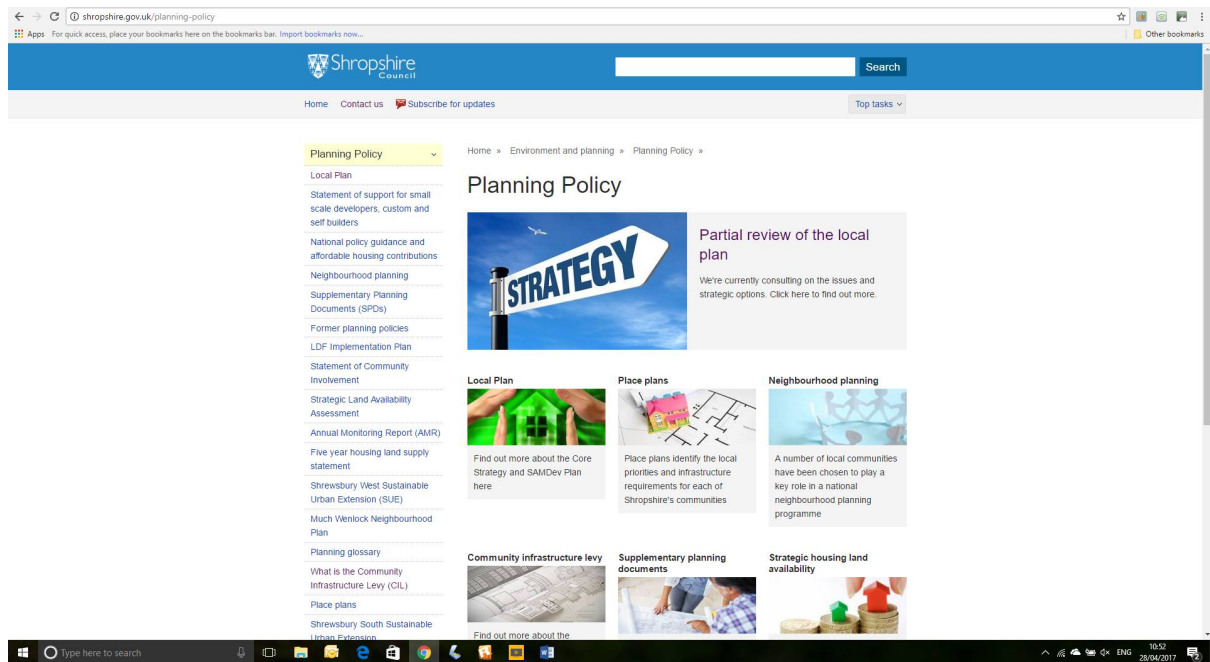
- 1.4. This document sets out our responses to the questions asked in the Council's consultation questionnaire. We reproduce each question before setting out our response to it. First, however, we set out our more general concerns about the consultation process, which you can take as being 'Other comments' in response to Q13.
- 1.5. Before answering the main formal questions, we have concerns about:
 - A. The validity of the consultation process
 - B. The assumptions made about the future economy of the County
 - C. The sustainability of incessant growth

A. The validity of the consultation process

- 1.6. It is our understanding that the legal Principles relating to "consultation" mean that a consultation process must satisfy the requirements of fairness.
 - i) The essence of consultation is:
 - (a) That it must be undertaken at a time when the proposals are at a formative stage;
 - (b) It must include sufficient reasons for the particular proposals to allow those consulted to give intelligent consideration and an intelligent response;
 - (c) It must give adequate time to allow those consulted to give intelligent consideration and an intelligent response;
 - (d) The product of consultation must be conscientiously taken into account when the ultimate decision is taken.
 - ii) Consultation axiomatically requires the candid disclosure of the reasons for what is proposed.
- 1.7. The current Economic Growth Strategy (EGS) consultation was launched on 13 March 2017. That means that this consultation was started before the close of the

consultation on the Local Plan Partial Review (LPPR), which ran from 23 January to 20 March 2017.

- 1.8. The LPPR consultation offered only one document in its evidence base, namely the Full Objectively Assessed Housing Need Report (FOAHN). The EGS consultation offers many documents as evidence (including Marches LEP and West Midlands Combined Authority Documents) which were not specifically referenced within the LPPR consultation.
- 1.9. Section 3 of the LPPR consultation document was on 'Economic Growth and employment'. The LPPR consultation questionnaire offered (at Q8) three options for Economic Growth, namely Significant Growth, High Growth and Productivity Growth. At Q4 it offered three options for housing growth, which amounted to a requirement for 26,250, 27,500 or 28,750 houses over the period 2016 - 2036, despite the FOAHN requiring only 25,178 houses (and we argued in our response to the LPPR consultation that the FOAHN figures themselves were inflated above what was reasonable).
- 1.10. The EGS consultation document (on the second page of 'The vision') states that the housing target is 1,375 new homes a year for the period 2016 - 2021. This is equivalent to 27,500 houses over a twenty year period. In fact Shropshire Council's Core Strategy Policy CS10 has set a phased target of 1,390 houses a year for the period 2016 - 2021.
- 1.11. The EGS consultation document also overtly states that *'a step change [is] needed in Shropshire's economic productivity. It has significant potential to do more and do it better. We must be ambitious, focused and committed if we are to achieve maximum economic productivity'*.
- 1.12. This emphasis within the EGS consultation material on maximum economic productivity and a housing target equivalent to 27,500 over a twenty year period is clearly jumping the gun and offering options that may or may not be supported by the results of the LPPR consultation.
- 1.13. Furthermore more supporting documentation has been made available within the EGS consultation than was offered in support of the Economic Growth section of the LPPR consultation.
- 1.14. Taken together, the two consultations are incompatible with each other and do not satisfy any of the four requirements set out in paragraph 1.6i) above.
- 1.15. Even on the last day of this EGS consultation there was no clear reference to it on the Planning Policy page of the Council's website. Instead, that page continued to headline the LPPR consultation (as below), as though it were the current ongoing consultation, even though it had closed over a month previously.



- 1.16. For this EGS consultation the Council's consultation website offers only the option of entering responses into a Survey Monkey form, with no option of viewing the questions before they appear on the screen. The Survey Monkey form seeks responses primarily on the six Priority Actions and Targets, with no responses sought on the overall 'Vision'. This is a failing which we have addressed by submitting this more considered response, rather than completing the Survey Monkey form. It has taken days of thought and time to do this, so it is disingenuous of the Council to state in the preamble before the Survey Monkey form that '*This survey should only take around 10-20 minutes of your time to complete*'. Surely nobody should be expected to dash off responses to an important consultation in such a tiny period of time.
- 1.17. It is also too simplistic to expect one single agree/disagree type response to every topic. Some are complex topics where it is possible to agree with one aspect but to disagree with another. The Survey Monkey format may make handling responses easier for the Council but it does not encourage '*those consulted to give intelligent consideration and an intelligent response*' (see paragraph 1.6i)(b) above).
- 1.18. For all the above reasons we feel obliged to question the validity of the process surrounding this EGS consultation.

B. The assumptions made about the future economy of the County

- 1.19. In our response to the LPPR consultation we set out why we think the assumptions being made about the future economy of the Shropshire Council area are questionable. For ease of reference we again attach that CPRE LPPR consultation response. Our concerns are set out on pages 4 to 6 in paragraphs 1.30 to 1.43.
- 1.20. Later in that LPPR consultation response we replied to the specific questions about Economic Options, on pages 16 to 18, at paragraphs 6.1 to 11.3.

- 1.21. In summary, we argued that developments elsewhere within the West Midlands Combined Authority (and Midlands Engine), the Northern Powerhouse and the Northern Gateway would not clearly benefit Shropshire apart from their relative proximity. That proximity may also mean that they compete against Shropshire, especially if significant amounts of land and housing are released nearby.
- 1.22. The LPPR consultation made only passing reference to the Marches LEP which is now also brought forward to support the Council's bullish ambition for economic growth. The NPPF requirement at paragraph 154 that '*Local Plans should be aspirational but realistic*' does not justify an overly bullish approach, nor '*a step change in . . . economic productivity*', nor an aim '*to achieve maximum economic productivity*'.
- 1.23. As to our responses to the detailed LPPR consultation questions 6 to 9, our view is that a prosperous future for Shropshire will probably rely on a targeted approach to higher productivity growth, which benefits from Shropshire's attractiveness, along with support for the rural and environmental industries which the area is best suited to attract. The provision of good quality broadband and smaller units, for example starter units, may be as important as large scale sites.
- 1.24. If Shropshire is to benefit from developments such as HS2 it needs to create its own particular offer, especially as there may be an excess of high quality sites coming on stream closer to HS2, rather than replicating what is available at better locations near the HS2 Northern Gateway station.
- 1.25. In general terms we would support Option 3: Productivity Growth, because a more targeted approach seems the most appropriate. The approach of Option 3 is, in our view, more appropriate to Shropshire and would encourage the development of newer and more innovative industries. It appears to us that Option 3, with some flexibility for review, is likely to be the most forward looking approach.
- 1.26. There is no need for Shropshire to compete with neighbouring authorities for employment opportunities. The approach to the economy should be a collaborative one.

C. The sustainability of incessant growth

- 1.27. The incessant quest for growth, and in the Council's case maximum growth, is by its very nature unsustainable in the long term. The generation who are embarking on adult life are more likely to be in debt and their ambitions to get on the housing ladder are less likely to succeed. There is no evidence that an insatiable quest for growth will remedy their prospects.
- 1.28. What is needed is a smarter approach, which we had understood to be the thrust of Option 3: Productivity Growth, within the LPPR consultation.
- 1.29. There is only one document offered within this EGS consultation, namely the pdf copy of the 10-page Draft Economic Growth Strategy 2017 - 2021. The LPPR consultation offered eight documents, including a Sustainability Appraisal Report.

- 1.30. It appears therefore that the current proposals for Economic Growth have been drawn up without any consideration of whether or not they are sustainable.
- 1.31. Nor is there any mention within the consultation document of any effects the proposals might have on climate change, or of how the proposals will help to promote a low carbon economy.
- 1.32. All proposals should aim at a low carbon outcome, and should certainly not foster any further increases in commuting.
- 1.33. In a large rural county like Shropshire we need access to modern smart digital technologies, particularly to proper fibre broadband coverage, and to mobile phone coverage, throughout the County. There is also a greater need for decent public transport coverage if we are to move towards a low carbon economy.

2. Responses to detailed questions

Q1: To what extent do you agree or disagree that the actions described within Priority Action 1: Target actions and resources on Economic Opportunities, are the right ones for us to pursue?

- 2.1 We broadly agree with the aim of targeting existing employment sites and specific sectors, providing that any development is broadly carbon-neutral. That will require smarter thinking than a simple growth, growth, growth attitude.

Q2: Do you think there are other actions we should be developing?

- 2.2 Shropshire is primarily a rural and agricultural county by area, which in turn makes it an attractive place for visitors and for in-migration. The existing agricultural sector should also therefore be fostered and should not be jeopardised by any proposed economic development in other sectors.

Q3: To what extent do you agree or disagree that the actions described within Priority Action 2: Enable businesses to grow and succeed, are the right ones for us to pursue?

- 2.3 We broadly agree with the aim of providing an environment that allows businesses to grow naturally, with the proviso that any development should be broadly carbon-neutral.

Q4: Do you think there are other actions we should be developing?

- 2.4 The economy should remain mixed, with no business or sector becoming dominant.

Q5: To what extent do you agree or disagree that the actions described within Priority Action 3: Deliver Infrastructure to support growth, are the right ones for us to pursue?

- 2.5 We broadly agree that the right infrastructure should be in place to support the economy, providing that it does not increase carbon emissions. Full fast broadband and mobile coverage should be in place for a 'smart' economy. Public transport in rural areas needs to be better. Houses should not be built without nearby employment opportunities, nor without adequate places in nearby schools, nor without adequate nearby health facilities. Better and smarter accommodation for Shropshire's ageing population is also needed.

Q6: Do you think there are other actions we should be developing?

- 2.6 As noted above, proper schools, healthcare and old age facilities are an integral part of a healthy society and economy.

Q7: To what extent do you agree or disagree that the actions described within Priority Action 4: Meet skills needs and people's aspirations for work, are the right ones for us to pursue?

- 2.7 We broadly agree with the aim of getting a better and more appropriately skilled work force, and of tapping the potential for voluntary work by retired people.

Q8: Do you think there are other actions we should be developing?

- 2.8 No

Q9: To what extent do you agree or disagree that the actions described within Priority Action 5: Promote Shropshire to investors, are the right ones for us to pursue?

- 2.9 We strongly disagree that Shropshire should actively advertise itself in the way suggested, in order to achieve the 'step change' and the 'maximum economic productivity' which we believe is a misguided aim.

Q10: Do you think there are other actions we should be developing?

- 2.10 Working closely with neighbouring authorities to ensure that new and existing economic activity is in the right place, rather than promoting Shropshire in a stand-alone fashion.

Q11: To what extent do you agree or disagree that the actions described within Priority Action 6: Build our reputation as a Council that is 'good to do business with', are the right ones for us to pursue?

- 2.11 For similar reasons to those given above at paragraph 2.9, we disagree that the Council should place undue emphasis on promoting itself in competition with other neighbouring authorities. All Councils should be 'good to do business with' but we disagree that the Council should have a 'growth culture'.

Q12: Do you think there are other actions we should be developing?

- 2.12 As implied in comments above, if the Council wants to foster some Unique Selling Point in competition with other authorities it might do well to help lead the way to a low carbon economy by particularly encouraging businesses that aim to be carbon neutral or which aim to reduce energy consumption.

Other comments

Q13 If you have any other comments about the draft Economic Growth Strategy please let us know.

2.13 Please see all our comments under section 1 above in paragraphs 1.4 onwards.

We strongly disagree with the '*growth culture*' that the Council seems to be proposing, even before it has assimilated the responses to the Economy sections of the LPPR consultation.

We question the validity of the process surrounding this EGS consultation, because it overlaps with, and is not consistent with, the LPPR consultation.

Continued growth is unsustainable, and with the current emphasis on reducing the effects of climate change, the Council should place much greater emphasis on that, rather than promoting unsustainable growth that also risks harming the rural nature of the County which is such an important part of the lives of many who live in, and who visit Shropshire.