



Date: Tuesday, 10 October 2023

Time: 2.00 pm

Venue: Shrewsbury/Oswestry Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Contact: Emily Marshall / Shelley Davies, Committee Officer
Tel: 01743 257717 / 01743 257718
Email: emily.marshall@shropshire.gov.uk / shelley.davies@shropshire.gov.uk

NORTHERN PLANNING COMMITTEE

SCHEDULE OF ADDITIONAL LETTERS

NOTE: This schedule reports only additional letters received before 5pm on the day before committee. Any items received on the day of Committee will be reported verbally to the meeting

This page is intentionally left blank

NORTH PLANNING COMMITTEE		
SCHEDULE OF ADDITIONAL LETTERS		
Date: 10th October 2023		
NOTE: This schedule reports only additional letters received before 5pm on the day before committee. Any items received on the day of Committee will be reported verbally to the meeting		
Item No.	Application No.	Originator:
5	23/03074/FUL	Public comments
<p>Additional correspondence received from members of the public summarised as follows (full comments are available to view on the planning file):</p> <p><u>Management Plan</u></p> <p>Not clear on role and responsibility of Shropshire Council Staff and Star Housing</p> <p>No details to measure the success or failure of the proposal and how any failures would be addressed.</p> <p>At 1.2 the projected timespan of residency (6 months to 2 years) may not be realistic as moving out is reliant on the resident finding a suitable placement within social housing options where there is limited stock and long waiting lists or more expensive private rent.</p> <p>1.5 refers to residents needs, and some having suffered significant trauma, but it is not clear what specific training will be provided to staff Vs what will be a requirement for applying for the support staff roles.</p> <p>At 1.6 it states that this form of accommodation does not currently exist in Shropshire which implies that residents would be from all of Shropshire.</p> <p>Para 1.6 suggests the plan “reflects good practice at national level” and at both consultation meetings were provided 3 examples. Simple searches of Google Earth showed that each of those services were in, or close to, business or industrial parks and not in dense residential areas such as Coton Hill.</p> <p>1.7 & 1.8 is required to give examples of anti-social behaviour and how local residents can report any such behaviour. Not clear what would happen if an individual is evicted from the scheme, what notice will be given and where they can then go to for support.</p> <p>If residents have complex behaviour issues and/or substance misuse issues, non-compliance is likely and unclear regarding the criteria and thresholds for antisocial behaviour and non-compliance.</p> <p>Queries the staffing levels and training referred to in section 2 and considers that 2 members of staff at night is insufficient and 3 or 4 members of staff in the day is too vague.</p> <p>Suggest that the staffing levels at 2.6 be revised to 7 am to 7 pm Monday to Friday: an absolute minimum of three housing support officers, 6.30 pm to 7.30 am, weekends and bank holidays: a minimum of three staff; made up of concierge and housing support officers.</p> <p style="text-align: center;">Page 1</p> <p>There are gaps in the shifts and the level of training and roles are not clearly defined.</p>		

At 2.3 that refers to specialist support workers it is unclear whether this is a criteria for accepting a resident to CHH and, for example, whether someone with mental health issues have to have an existing care plan to ensure eligibility, or will it be the responsibility of CHH staff to refer the resident to receive such support services?

What processes will ensure that the communication with local residents referred to at 2.5 and the community communication at 15.4 take place?

2.7 alludes to the fact training will be undertaken where needed and concerned if this is on the job how residents will be impacted by this skills gap.

3.3 refers to male and female residents being housed in separate corridors with use of key fobs, and it is unclear regarding the security of this. Mixed gender housing could be a risk if men with a history of domestic abuse are resident in the building. How can the council prevent women being coerced or forced to hand over their fob?

Needs to be as separate communal area for men and women.

Questions what provision is being made for people who are trans and homeless.

3.4 What are the thresholds that shape the low, medium and high level of support needs?

Para 3.5 refs extra CCTV facilities within CHH and the grounds but there is no mention of monitoring anti-social behaviour within the immediate neighbourhood.

Section 4 that relates to eligibility and the assessment process is not sufficiently robust and clear.

Unclear whether CHH is proposed to cater for all residents with priority needs or only cater for some categories.

Confirmation is required that CHH residents will not have issues with drug dependency.

Extra scrutiny of risk is required given the location of the proposed facility and the lack of detail that has been provided with regard to eligibility criteria for potential residents.

4.2 and 4.3 No laid down criteria or risk assessments have been published to govern and document decisions – no minimum criteria for length of time spent in resettlement accommodation – it could be one week to one month?

4.2/4.4/4.6 refer to a risk assessment undertaken by the Council's Housing Options Team together with staff at Coton Hill House to ensure suitability for the facility but considers that it is not detailed enough regarding the criteria for whether someone is too high risk.

Section 4.4 – Those individuals considered as too high risk for the proposed supported accommodation at Coton Hill House will not be housed at the scheme – no definition, benchmark or examples as to what is considered too high risk?

Section 4.6 discusses the some of the factors to be considered but no thresholds or examples defined.

Para 6.2 explains that no drugs or alcohol will be permitted on the premises but makes no reference to the likely presence of drugs and drug dealers attracted to the building and its users.

At 6.2 it is not made explicitly clear that the contract the resident is required to sign will list a requirement for them to meet a support worker at a minimum of once a week or to engage in group activities and considers this is required.

Within the house rules at 7.2 it refers to residents being expected to return to the accommodation at 12 midnight and considers this to be too late a curfew and will potentially result in noise and disturbance at or after this time.

7.2 makes reference to the fact that no visitors under the age of 16 may enter the property at any time, but anyone under the age of 18 is legally classed as a child, so safeguarding must still be considered for 16/17 year olds who may be eligible to be placed here.

Will the facility have safes in operation to store medication for residents with mental health issues, where relevant?

Would the local residents be allowed to view the log referred to at 9.3?

Who will be providing support and advice out of hours referred to at 9.7?

Section 10.1 – Residents will be expected to engage with their housing support officer and other agencies to assist in overcoming issues they may face and no clear definition of what the minimum engagement would be as the details are too vague? How can occupancy agreements be enforced if the terms are not clearly defined and published?

Para 11.3 talks about the rules and the implications for transgressors but there is no detail about the threshold / tolerance levels and if you reasonably assume that each resident would be given 2/3 “chances” and then factor that to 25 residents you begin to get a sense of prospects for constant disruption, within and outside the setting.

12.1 refers to in the first year of operation the Council will hold resident meetings to discuss plans and answer any questions and queries why this support is restricted to the first year only.

15.1 states that subject to agreed appointments local residents will be allowed to visit and queries how long it would take (a day, a month or only when it suites you?).

Applicant's Additional Supporting Statement September 2023

The unlawful use of CHH as a hostel for homeless people was not publicised to local residents in order to allow them to consider its impact.

There is evidence that residents experienced anti-social behaviour during the time that it was used as a hostel.

Queries whether the correct data has been used and considers that the figures and areas illustrated in the appendix to this document do not relate to the correct area and do not reflect the experience of residents.

The council have used misleading data covering the outer part of the Bagley ward when the landlord of the Woodman public house was a victim of crime but is outside the area used.

The statistics only refer to crimes recorded and exclude anti-social behaviour observed.

The figures for the Flash and Pig Trough increased from a base line in March 2021 of 33 and significantly increased to over 200 per month to a maximum of 233 in March 2023 and subsequently decreased when CHH was vacated to 130 in July 2023 and these figures were not made available for scrutiny.

In Sections 10 & 11 incidents are blamed on members of the public and queries whether this has been proven and there is no evidence to conclude it was anyone other than one of CHHs Tenants friends.

Para 10 & 11 – Where is the evidence to support the claim that the fire service were called following an arson attack on Coton Hill House by a member of the public?, or evidence of female members being subject to abusive language from members of the public?

Para 12 makes reference to standard practice for the local authority to follow a pathway approach – No details or publication of such practice is documented.

Section 17 refers to funding by Central Government but no details on how long this will be available and implications if it is withdrawn.

Para 17 Shropshire Housing has maintained that his facility is following best practice used nationwide, if that is the case, are all such accommodation units allocated to class “sui generis”?

Para 17 - Shropshire Housing has maintained that his facility is following best practice used nationwide, if that is the case, are all such accommodation units allocated to class “sui generis”?

Para 24 and 26. Questions whether the details regarding the consultation are correct.

The details of priority need in the appendices gives suggests that it is not unreasonable for residents to be concerned regarding loss of amenity and criminal activity in the area; nor to be concerned for the welfare of other residents within mental health issues, or victims of domestic violence etc.

Shropshire council could have provided clarity and clearly defined selection criteria together with risk thresholds. Absence of these documents provides strong grounds for community residents to be concerned regarding loss of amenity.

Many residents living close to CHH say they did not receive invitations to the consultation prior to the submission of the application and referred to in section 24.

Other issues observations

Considers that the consultation prior to the submission of the application was inadequate as many residents did not receive invites and they were held in the working day and at short notice.

Residents of Corporation Lane, Coton Crescent, Berwick Avenue, Coton Mount and Berwick Road all the most local and adjacent streets to this building did not receive letters.

Refers to being advised by Laura Fisher (Housing Resettlement and Housing Services Manager) that if a planning application was to be put forward a further formal consultation would take place. This has not happened and the application has been submitted.

This does not follow local government policy re planning application consultation process.

The numerous supporting comments that relate to a shortage of accommodation in Shrewsbury reflects a lack of clarity or acknowledgement that this proposal will provide a Shropshire wide facility, not a provision limited to Shrewsbury residents.

Due to poor consultation and lack of information on the financial side there is much distrust of anything written in the management plan. Requests robust data and a business plan.

There is absolutely no data or evidence to substantiate the comment by Councillor Wagner in paragraph 4.2.4 of the report.

The recent closure of the ARK is an example that anti-social behaviour occurs and puts the local community at risk in the vicinity of an organisation providing help to the homeless.

Emily Bell, Chair of the Shrewsbury Ark announced on BBC Radio Shropshire that the Ark would be closing for a minimum of four weeks and that you have one or two people in temporary accommodation or in their own flat who are struggling then the police or mental health services can deal with that; they can't deal with 10-15 people in the Ark or Ark Car Park.

In light of this very recent development and open acknowledgement that despite multi-disciplinary training and resources, the Ark is unable to mitigate the behaviour of 10-15 people with complex needs, there is clear evidence to support a delay in considering this planning application for 25 individuals with complex needs including trauma, substance addiction/abuse; domestic abuse, mental health issues, criminal behaviour/subject to probation service monitoring.

Refers to the increase in ASB in the town centre associated with the increased facilities for alcohol/drug/substance abuse and homelessness.

The change in Shrewsbury is unbelievable in recent years and the Council are being completely naive if they do not think these further facilities planned in an area in close proximity to other facilities for addicts and extreme homelessness will not affect Shrewsbury as a Town.

Putting so many people in one location in a purely residential area is recipe for disaster.

Considers that facilities such as this for people whose lives are at rock bottom physically, emotionally and mentally should not be within walking distance of a Town centre and within residential areas for the aim and object of such facilities to be a success.

Why should a small community in Shrewsbury have to absorb the needs and challenges of a larger vulnerable group from across the whole County?

This proposal has failed to take adequate account of the likely impact on the local community.

Placing 25 vulnerable people in a single location, with the predictable prospects of them attracting socially disruptive dealers, is ill considered and has a high chance of failing even with a revised management plan.

Following original objection and details having been significantly revised withdraws comments on the Staffing Arrangements but maintains those on the Unsuitable Location.

Should CHH be subsequently sold for private ownership are the stipulations within the management plan transferable and are any potential new owners obliged to adhere to the same stipulations?

There has been a very one-sided report given to the Planning Committee to consider. There are 272 objections and 14 supporting comments yet the objections have been watered down into 53 "bullet points" whilst the supporting comments were granted 28. There is a lot of very relevant and reliably sourced information in the objection comments which have been ignored.

Considers that the Supporting Statement, Revised Management Plan and Development Management Report at perusal contain areas of gross misinformation, defamatory representations and inaccuracies tailored to obtain planning approval.

Given the costs, community impact and "sui generis" nature of this proposal, residents of Cotton Hill feel that insufficient data has been submitted.

The Management Plan deserves significantly deeper scrutiny from the community and committee than the allotted time (two weeks) from the 90 page revised management report being published.

To publish a Development Management Report to the Planning Committee for such a contentious Planning Application 6 days ahead of the Planning Meeting, a mere 2 weeks following the publication of a revised Management Plan suggests a strong desire to deprive reasonable opportunity for members of the public to review and respond to the documents negating a genuine desire to engender confidence and support of the local community.

Nat Green (Ward councillor for Bagley and Cotton Hill advised attendees at the meeting of PORCH on 22 Sep 23 that he believed consideration of the application may well go to November, would indicate that he anticipated additional time to consider the revised documents would be undisputed.

Councillor Wagner agreed

Requests that more time is provided for this planning application and for the management plan to be revised and informed by community feedback and requests that the committee considers a postponement

Item No.	Application No.	Originator:
5	23/03074/FUL	P.O.R.C.H

See attached updated objection (05.10.2023) from P.O.R.C.H (Project Overview and Response to Coton Hill House proposal) which indicates is a neighbourhood community group of over 100 Coton Hill residents created for discussing and responding to the proposed Coton Hill House Project.

Item No.	Application No.	Originator:
5	23/03074/FUL	Petition signed by 408 Coton Hill residents

PORCH (Project Overview and Response to Coton Hill House proposals)

We, the undersigned, as local residents and members of the community who live and work in and around the Coton Hill area, strongly object to the proposed plans for Coton Hill House to be converted into homeless supported housing.

We would also like to assert that we have no confidence in Shropshire Council's approach for the following reasons:

- Unlawful continued use of Coton Hill House to house homeless residents without obtaining change of use permission.
- Refusal to address anti-social behaviour resulting from residents of Coton Hill House during time of unlawful use.
- Refusal to maintain open communications with local residents regarding plans for Coton Hill House.
- Deceptive practice by producing a planning application with substantive differences from verbal assurances given to the media, and to local residents.
- Producing an inadequate management plan, riddled with inaccuracies, contradictions, and without any justification for the detrimental effect of the concentrated placement of 25 vulnerable homeless within a wholly residential community, contrary to international best practice for vulnerable homeless support.

Item No.	Application No.	Originator:
5	23/03074/FFUL	Applicant response 09.10.2023

See attached.

This page is intentionally left blank

P.O.R.C.H. (Project Overview and Response to Coton House proposal)

Revised response to the new Management Plan and Supporting Statement with reference to the Development Management Report for Application 23/03074/FUL Conversion of Coton Hill House to self-contained supported Housing Apartments.

This is a formal objection on behalf of P.O.R.C.H. (Project Overview and Response to Coton House proposal) This is a neighbourhood community group of over 130 Coton Hill residents created for discussing and responding to the proposed Coton Hill House Project.

Revised Management Plan (Published online 20th Sept 2023)

This has been improved, however there are still some inherent questions the P.O.R.C.H. community would seek to address, and it has been too short a time for the revisions to be examined in great detail as the deadline of 5th October 2023 is so short. We request that there is more time provided for this plan to honed with community feedback as we will be living with the consequences for a long time if this sui generis plan is not robust.

Overall, this new management plan is a modest but welcome improvement on the previous plan. The PORCH community held a meeting (attended by 60 Coton Hill residents and Cllrs Nat Green and Alex Wagner) on 22nd Sept. At the meeting the members felt that some pivotal information was still lacking from the plan.

The staffing level remains close to the original:

2.2 *“It is intended that the scheme will directly employ 12 full-time equivalent workers”*

The PORCH community observation was the term *“intended”* suggests that this is the aim but that it may not be achieved.

2.5 states that *“The absolute minimum number of housing support officers on-site during weekdays will be two, however, usually at least three officers will be present.”*

The PORCH community observation was that the use of the word *“usually”* is too vague.

It was also observed that there are several paragraphs in the revised Management Plan where vague language needs to be replaced with more robust language.

OTHER OBSERVATIONS

3.5 refers to extra CCTV facilities within CHH and the grounds; but there is no mention of monitoring anti-social behaviour within the immediate neighbourhood. How is the community expected to police our neighbourhood? What support will we be offered?

4.4 States that applications deemed to be *“too high risk”* will be refused. This is good news, but the local community needs reassurance about thresholds that will be in place for admission.

6.2 States that no drugs or alcohol will be permitted on the premises, but House Rules allows for exceptions if the resident is in an agreed detox programme to reduce their dependency. It is worrying that there may indeed be drugs and alcohol on the premises under these rules which will be a potential trigger for some inhabitants. This plan makes no reference to the likely presence of drugs and drug dealers attracted to the building, but community lived experience is that since the unlawful use of Coton Hill which ended in July this year, we have been left with a legacy of dealers in our area.

11.3 Discusses the rules and the implications for transgressors. Again, there is no detail about the threshold / tolerance levels. This needs firming up. If we assume each resident would be given 2-3 “chances” and then factor that to 25 residents, it makes for worrying reading and places an undue burden on the community to be vigilant. We know from the previous unlawful residents that the burden of proof that a crime has been committed by a resident lies with the community, otherwise we are met with shrugs: ‘*Could have been anyone*’.

There is concern that these vulnerable people take precedence over the local vulnerable people, who have been subjected to unfounded accusations in the supporting statement and in the Development Management Report. The tone of these accusations are very concerning to a well-meaning community trying to come to terms with this plan, and also do not bode well for ongoing liaison with the community as there has been such a refusal to engage historically.

The scale of this plan and the lack of precedent is a concern for us all. Placing 25 vulnerable people in a single location, has a high chance of failing even with a revised management plan. Even though The Ark is no doubt supported by a robust management plan and strong finance from RESET, their very recent experiences, and decisions to temporarily close, are evidence that this is not a user group readily impressed with, or persuaded, by plans.

Supporting Statement (Published online 20th Sept 2023)

The first thing to address in the supporting statement is the dates referred to throughout this statement and in the subsequent Development Management Report for when CHH was unlawfully occupied. The dates March 2021 to June 2023 are indeed the dates for the unlawful occupancy, but prior to that the building was used for cold weather emergency accommodation and rescue accommodation from December 2019. This is most relevant when it comes to discussing community experience of ASB and criminal activity.

Because these December 2019 predates the data available, and because the occupancy only ended in June this year, there is simply insufficient data to demonstrate the lived experience of the community, although the details in the 270 individual objections surely hold testament to this having been a problem. The data since June is unlikely to reveal much as the community has been left with a legacy of drug dealers and undesirable visitors in the area after the two years plus of unlawful occupancy has established a viable route for them.

The published screengrabs of data that comprise Appendix IV are misleading and have been collated to create a narrative that is misleading. We attach Appendix I which demonstrates this.

In reference to the 'temporary' use of CHH. (over two years):

5 States: *"Given the very high increase in homeless households to whom Shropshire Council owed the interim duty to accommodate (exacerbated by the impact of Covid 19) there has been no alternative but to use unsuitable and expensive bed and breakfast type accommodation. Evidence available indicates a continual upwards trajectory, which presents a continual challenge to the Council."*

This paragraph is typical of the whole tone of the supporting statement: There is no analysis or data; emotive appeals and generalisations should not replace facts and evidence. There are no figures given anywhere for the number of homeless households or individuals. The only published figure we can find is from the Annual General meeting of the Ark who suggest (it is a bit woolly) that about 12 people are legitimately homeless in Shrewsbury. This supporting statement should provide evidence and not give qualitative unfounded statements. How many? What evidence? Where is the supporting data?

6. *"In responding to an escalation in number of individuals that were owed the interim duty to accommodate, from March 2021".*

Again: Data? Evidence?

7. *"Whilst Coton Hill House was used on a temporary basis by the Council it accommodated no more than 15 single homeless persons... at any one time."*

How does a period of over two years get to be described as 'temporary'?

8. *"As is set out below the proposed supported housing scheme, which has been based on good practice and is central government funded, forms part of a pathway approach, therefore, is a different provision from its use during March 2021 to June 2023. In addition, not only does the eligibility criteria differ, but residents will have their own self-contained accommodation, but the staffing structure is very different."*

What 'good practice'? Where is the 'pathway approach' documented?

It is not sufficient to say the money will come from Central Government. Our community is concerned about the sustainability of the plan, we feel we have a right to know how this scheme will be funded in terms of both a capital expense and maintained into the future.

9. *"...over the period March 2021 to June 2023, there have only been low reports of Anti-Social Behaviour (ASB). The Council acknowledges two known and reported incidents of criminal activity undertaken by occupants of Coton Hill House over this 27 month period – these being the theft of a mobile phone (the occupant was evicted immediately after the Council discovering what had occurred) and urinating in a public place by an occupant when on their way back to the scheme."*

This statement exactly highlights our problem as a community with trusting this proposed plan. There are 270 detailed case studies in the objections detailing our lived experience and these are being brushed aside. The data submitted in the additional supporting statement

by the applicant in Appendix IV is erroneous; the maps which are available on Police UK have been drawn to exclude the real figures for the area – the real figures are between 2-3 times higher and provide evidential basis for the fears of the community. (Appendix I) As stated the only two incidents attributed are because police could directly link the criminal act to a CHH resident (the phone was traced to them and found onsite). Many more cases remain unacknowledged including aggravated burglary and affray.

We would like to further point out that because the previous inhabitants of CHH were there unlawfully, the community was not reporting crimes as we do now, as we were not notified to be vigilant. Many residents are miserable that they did not report ASB and theft during this time as they could not get through on the phone to 101, and did not expect the police to take any action. (with some justification and lived experience) This is acknowledged by the Development Management Report in **6.4.5**.

We attach in Appendix I some examples of the mismatched crime data.

10. *“As is the case for many forms of supported accommodation, the police were required to visit due to undertaking welfare visits, the ambulance service visited to attend to occupants suffering from ill health, and the fire service attended to undertake fire risk assessments and also following an arson attack on Coton Hill House by a member of the public”.*

This portrays the frequent visits by these services as innocent attendance – but this is misleading, not least as they often visited using ‘blues and twos’. The grave implication is that a member of the Coton Hill community conducted an arson attack on CHH. This hearsay statement needs to be removed.

11. *“Moreover, during the period March 2021 to June 2023 Coton Hill House was used as a temporary measure there are examples of female occupants being subject to abusive language from members of the public. These incidents were reported to the police.*

Needs analysis (sic)”

This is another grave slur on our community. It requires evidence or should be given zero credence. It is frankly astonishing that this is being included in a supporting statement.

13. *“...Analysis of the housing market, including existing supported housing provision, homelessness statistics, and consultation with statutory agencies and homeless organisations, has evidenced that Shrewsbury has a gap in homeless pathway for up to 30 units of supported housing with 24/7 support for single person homeless households.”*

Given the cost, community impact and *sui generis* nature of this plan, it is insufficient to say there is ‘analysis’; it must be shown. There is no business case made for this plan in this supporting statement apart from woolly statements and hearsay. Where is the data?

16. *“The proposed conversion of the former residential care home, Coton Hill House, is to provide 25 self-contained supported housing apartments and associated staff offices and training room. As there is no particular planning use class for this type of supported housing, the application is sui generis. This is not uncommon, if planning permission was granted, it would be specifically for the proposed scheme as opposed to another form of supported accommodation”.*

Both unique and also ‘not uncommon’?

The Development Management Report states in **6.1.1**. *“that the plan is not considered C2 use (residential institution) which is why planning permission for change of use is required.”* However this is because if it were classified as a residential institution (which on the face of it, it appears to be) then the plan would contravene *SamDev plan MD3*. Where *‘Residential proposals should:*

i. Meet the design requirements of relevant Local Plan policies; and

ii. on sites of five or more dwellings, include a mix and type of housing that has regard to local evidence and community consultation.’

If this is not *sui generis*; then this is a site of 25 dwellings. They are not a mix or of a different type in regard to either local evidence or through community consultation.

It is our contention that this *sui generis* argument is being used to circumnavigate the council’s own policy laid out in *SamDev plan MD3*.

17. *“The proposed scheme is centrally government funded and its design is based on best practice from other national schemes.”*

There are no other national schemes like this as it is *sui generis*?

Centrally Government funded for how long? Under what scheme?

19. *“It is an aspiration that residents will positively integrate with the local community and will eventually be able to find and sustain a long-term home in the local area.”*

Firstly, we would like to point out that it is therefore a great shame that this statement seeks to smear the local community by insinuating that it abused CHH inhabitants and tried to commit arson on the building and yet is keen to strike up a friendship. We are a decent community, but we have been painted as NIMBY criminals. This is not in the handbook of how to make friends and influence people. We have been side-lined in this proposal and treated very badly when it comes to ‘consultation’. Not much trust has been built.

Again that inhabitants will move on to homes in the area is presumably part of the much mentioned ‘Pathway’ idea, but we cannot find any published notes on how pathways are to be formed. Where do the residents go after two years? Where do the residents go who do not manage to make the transition well? These ‘pathways’ are well-trodden verbally, but are elusive in all the paperwork.

22. *“Supported housing is a form of residential accommodation and as such it is vital that it is developed in residential areas, enabling people to access services and to be part of the community.”*

See above. But also here, we note, the proposed plan is *‘a form of residential accommodation’*. So not *sui generis*?

23-25 The points made here do not tally with our experience. The ‘consultation’ (billed as an informal consultation) was a sham and the posters from it have never appeared online or been published for wider public scrutiny. This has been addressed at length in the previous objections and is revisited in **Appendix II** here.

31. *“For the avoidance of doubt, the government funding for the proposed scheme is standalone funding. The proposed scheme and its associated funding does not*

have any connection to the RESET project nor the Shrewsbury ARK."

Where is the funding from? Does it carry restrictions? How long will it last? We want to see a business plan. Although the Shrewsbury Ark is 'not connected', the Development Management Report for the Application includes 10 statements from the Ark including these choice comments:

'The majority of the objectors to this application have responded on the basis of "Not In My Back Yard" - an entirely understandable and defensible position for local residents, particularly the elderly or those with young children, to take; but few have little in the way of positive alternative proposals other than "spread them out in small packages" which would make it next to impossible to provide the supervision needed to minimise subsequent problems.'

To reduce the 270 case studies of real pain our community has suffered and may suffer in the future to being 'NIMBY' is insulting and furthermore the idea that the responsibility for finding an alternative lies with us as a community is surely not right and should not be included in reported comments.

This section also includes this comment:

The innovative RESET team that has been operating for only 6 months is an example of how a new approach can generate encouraging results; and the presence of a training room in the design for Coton Hill House suggests a similar approach is envisaged there.

In the light of the Ark having to close down for a month to get its house in order and following comments from our MP serving Shrewsbury and the Police Commissioner is it any surprise that we are alarmed as a community that the Ark, being close to town and pulling large numbers of homeless together in an unpoliceable mass is being held up as a model way forward?

Development Management Report for Application 23/03074/FUL (released on 2nd Oct)

This timing of this report and the need for responding within just 3 days without warning is not what we would like to see in terms of either providing time for deep analysis of such a controversial proposal or building bridges with the community of Coton Hill.

1.5. *An Applicants Additional Supporting Statement has also recently been submitted that provides information on Shropshire Council's statutory obligations surrounding homelessness, explains why the proposed supported housing scheme is needed and how it will operate and how the scheme differs from the period the building was used from March 2021 to June 2023.*

The Supporting Statement does not explain 'why the proposed supported housing scheme is needed'. It has no data or evidence included that have bearing on this. As pointed out previously, the building was used by the council from December 2019 but only unlawfully occupied from *March 2021 to June 2023*.

Consultee Comment

4.1.1 SC Affordable Housing:

"The challenge of finding suitable accommodation for homeless single people is well documented."

Good that there is documentation. Then presumably there is some data available? Can it be included?

"...given that there is an acknowledged need for housing provision for such individuals and an acknowledged challenge in providing such accommodation it is considered that there is justification for such a proposal."

It should be noted that the majority of residential areas contain a mix of individuals and households; the backgrounds of many households often remain unknown and could include households with individuals that were once homeless or indeed have a criminal record."

'Acknowledged need' and 'acknowledged challenge' need backing up with data.

The second statement is extraordinary and has no place in a serious document. Again, our community is being implied to be largely constructed from criminals albeit reformed ones.

4.2.2 Seems to indicate 'support' from Shrewsbury Town Council, but they submitted a 'Neutral' verdict.

4.2.5 To lead with notes on appearance and bins when there are 270 comments that detail loss of amenity is literally misleading.

4.2.6 The 14 members of support include two from the Ark Trust and the media also refers to their involvement, yet the updated statement goes to great pains to say that 'Shrewsbury Ark has no connection'. (See above)

4.2.7 This document includes ten comments from the Ark, (who we are told have no connection to the scheme) including some scurrilous accusations of our community. This is hearsay and has no place in a serious document. The Ark is either a part of this scheme or it is not.

4.2.8 From the 14 supportive comments, the document finds 28 comments to quote.

4.2.11 From the 270 detailed case studies and objections comments you quote not even twice this number (circa 53)

5.0 Loss of Residential Amenity is the headline from the objection comments. Barely any discussed appearance or parking was made in the objections - again this is misleading.

6.1.1. *"the plan is not considered C2 use (residential institution) which is why planning permission for change of use is required."*

Sometimes it is called a residential institution and sometimes it is not (see above)

6.1.2 The Council's interim duty to accommodate is true, but there is no data in this proposal to back up numbers. No business plan. How many people are there that will qualify for this scheme? How many single people are in Bed and Breakfast? What evidence is there that the facility will work? The case studies are interesting but fictional - where is the data?

6.1.4 States: *'The proposed supported housing scheme for homeless single people will help to address the current shortage of this type of accommodation in Shrewsbury. The provision of housing within the urban area of Shrewsbury accords with Shropshire Core Strategy policies CS1 and CS2 that identify Shrewsbury as the primary focus for residential development for Shropshire.'*

So, it is a residential institution after all?

6.1.5 Why put this facility so near to the town centre? A place where temptation abounds for these vulnerable people? This has been a disaster for the Ark project.

6.4.4 States:

"The statistics indicate that there is no correlation between the levels of reported crime when Coton Hill House was occupied (March 2021 to June 2023) and the number of residents, and when it was not occupied (August 2020 to February 2021). There is no evidenced increase in crime associated with the former use of the building for housing homeless single households. "

This appears to be based on erroneous data submitted in the additional supporting statement by the applicant, where the data and maps have been drawn to exclude the real figures for the area - which are available on Police UK. We enclose some other views from the same site to illustrate in Appendix I.

We would like to further point out that because the previous inhabitants of CHH were there unlawfully, the community was not reporting crimes as we do now, as we were not notified to be vigilant. Many residents are miserable that they did not report ASB and theft during this time as they could not get through on the phone to 10, and did not expect the police to take any action. (with some justification and lived experience) This is acknowledged by you in **6.4.5**.

6.4.13 The management plan has been improved and the proposed vetting of the residents is welcome, but without a business plan, residents are concerned that this is not sustainable and will need this to be a permanent condition applied to the proposal. Unsurprisingly, given the previous unlawful occupancy (which is not mentioned explicitly in this report), and very poor mismanaged consultation, the community has come to a position of lack of trust with this scheme.

6.6.2 This consultation was a sham and the posters shown are still not available anywhere for public scrutiny. The Coton Hill Community has been treated very poorly. (**Appendix II**)

6.6.3 *“Funding: The funding for the proposal has been questioned and the Council criticised for not being open and transparent regarding this. The additional statement confirms that the government funding for the proposed scheme is standalone funding and that the proposed scheme and its associated funding does not have any connection to the RESET project nor the Shrewsbury ARK. Funding of the proposal is not a material planning consideration.”*

We beg to differ. We think the funding is very pertinent to this proposal particularly as it is *sui generis* and would like to see a detailed business plan.

6.6.8 States: *“The submitted documents indicate that there is a significant and urgent demand for the use as proposed.”*

We do not see any submitted documents that make this case. Again we ask for a detailed business plan and well sourced data.

7.4 and 7.6

We contend there is an evidential basis for the community’s fear of associated crime and ASB. We further contend that the community will suffer a significant loss of amenity in the surrounding area. That the report attributes no significant weight to this is plain wrong.

8.3 Equalities

The protected characteristic of gender is not addressed explicitly in the management plan. Where would trans people be fitted into the scheme. This should be provided for to avoid discrimination.

The statement: *“The site is within a mixed residential area that includes families with children and older persons accommodation. For the reasons given in the report regarding the fear of crime and anti-social behaviour not having a sound and reasonable basis for being attributed to the proposed future residents, it is considered that there are no groups with protected characteristics (identified in the Equality Act 2010) that would be adversely affected or prejudiced by this proposal.”*

Speaks to how the concerns of residents of Coton Hill have been ignored and side-lined. There may not be ‘groups’ but there are many individuals in the neighbourhood who are severely affected by this proposal. The number of objections testifies to this. Families are frightened of burglars and paedophiles, single vulnerable people feel trapped and afraid – reading many of their comments is heartbreaking. Why is it okay to marginalise and insult these people?

There now follows Appendices I and II.

Appendix I Demonstrates the erroneous Police data from the Supporting Statement

Appendix II Chronicles the exchange between resident Sharon Peck and the Applicant leader, Laura Fisher. It chronicles Laura’s concern over the consultation process.

Appendix III has been sent separately. It consists of photos of the 408 signatures from Cotton Hill on a petition. This has had to be hastily assembled given the shortened time to respond.

We expect this document and the petition submitted to the council members.

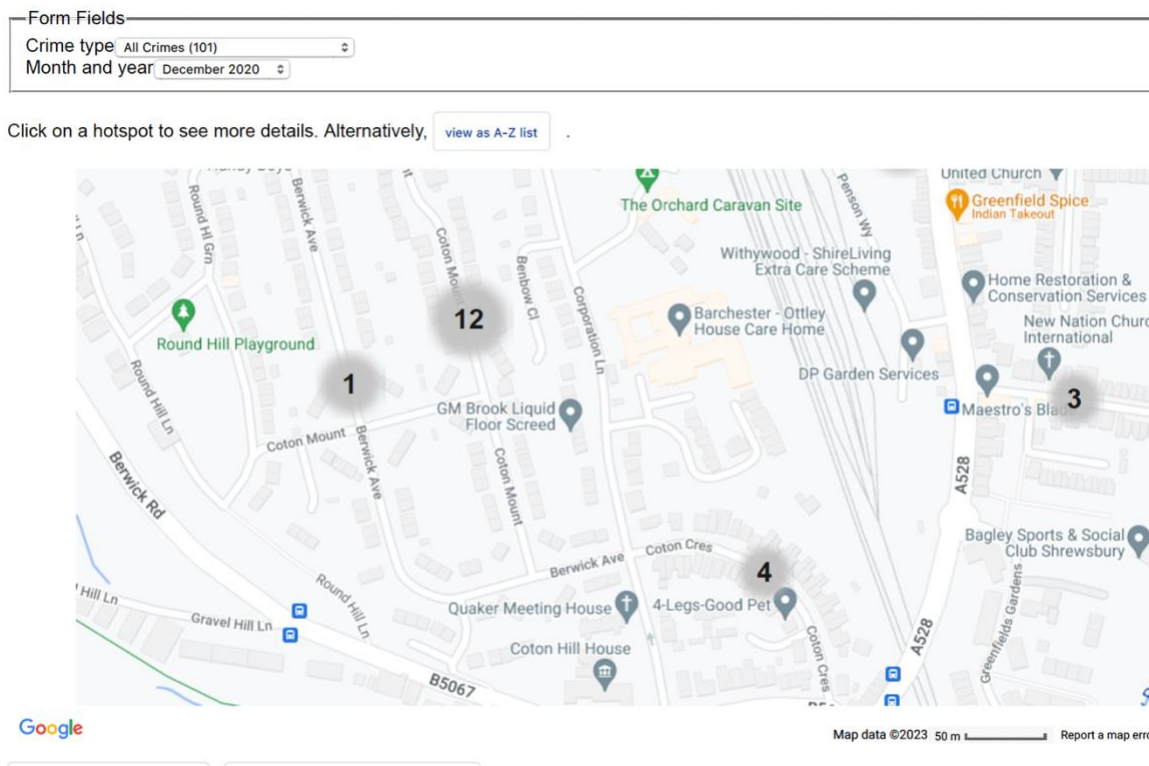
APPENDIX I

Police data revisited (NB without sufficient time to do a full analysis):

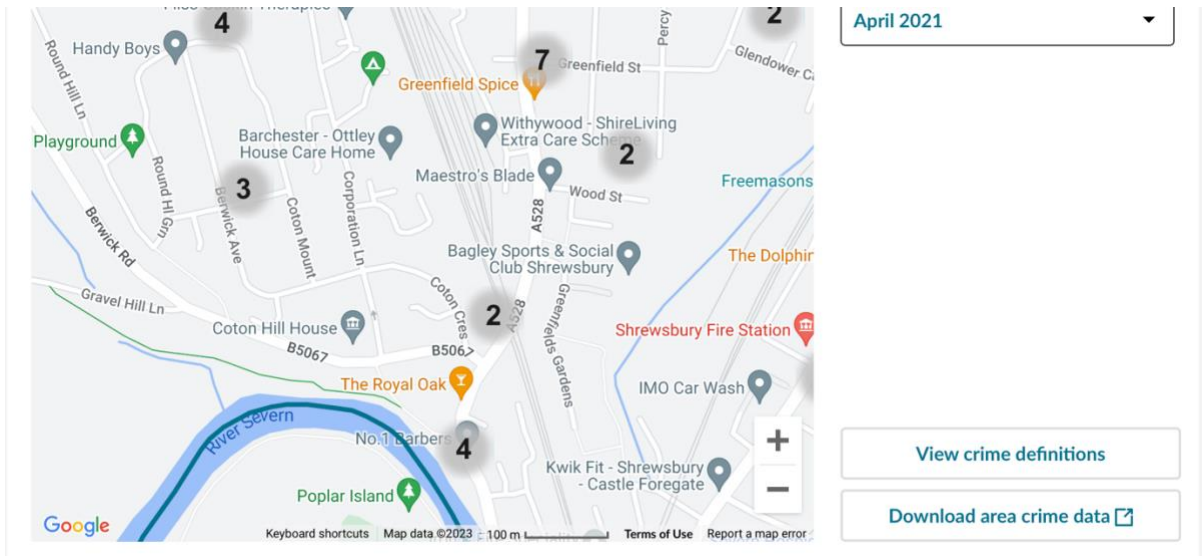
December 2020: Our screen capture records 31 Instances:



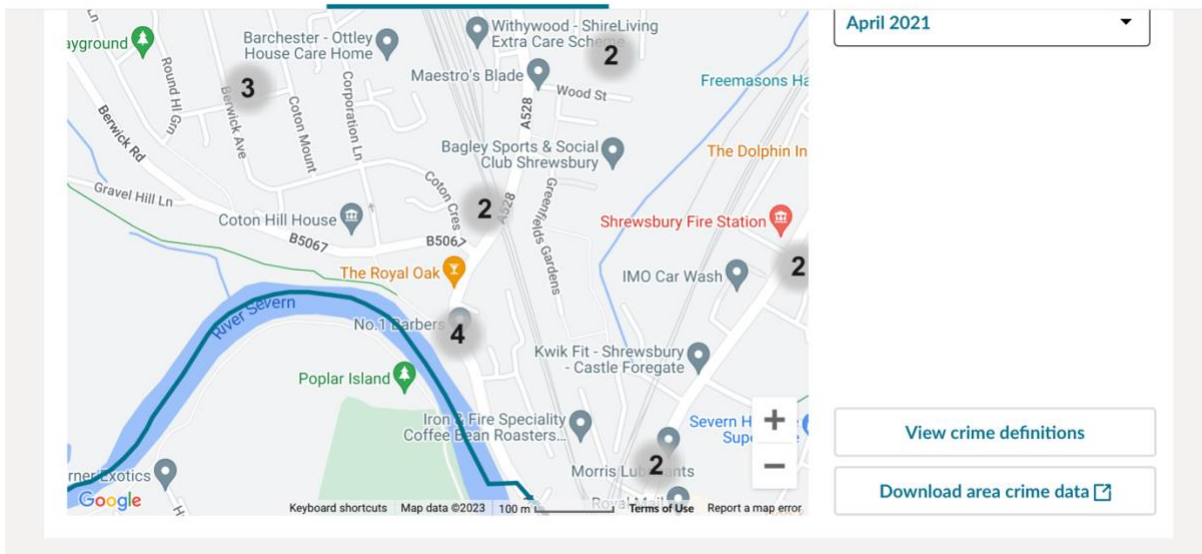
The screen capture from Appendix IV of the Supporting Statement for the same period records 20 instances:



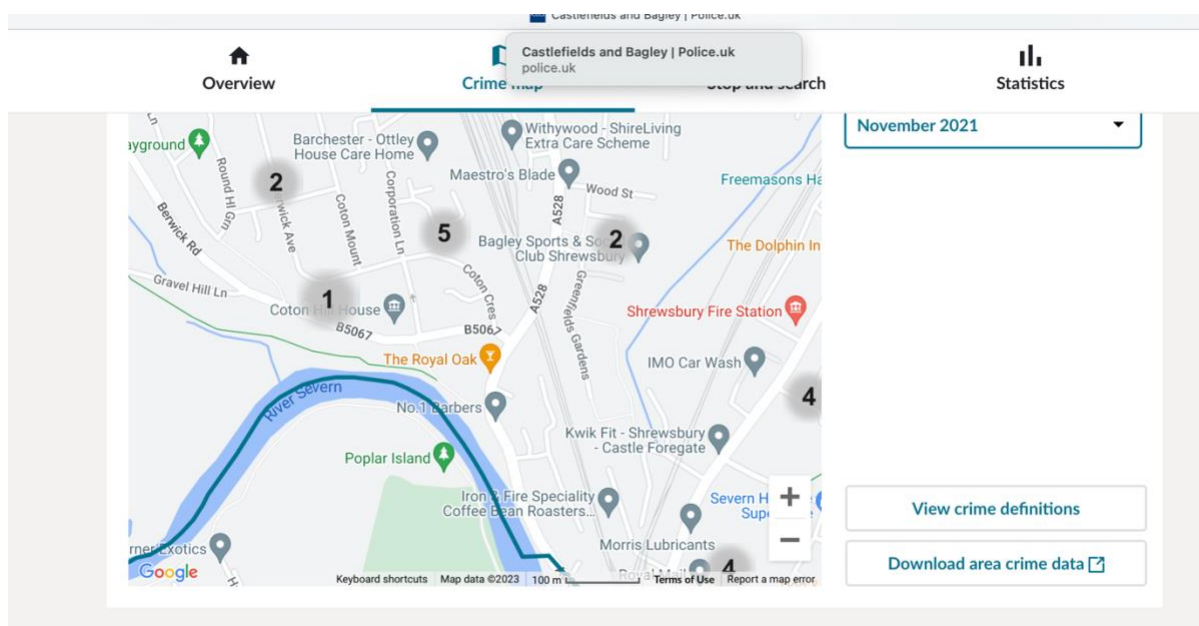
April 2021. Our screen capture records 31 Instances:



The screen capture from Appendix IV of the Supporting Statement for the same period records 13 instances:



November 2021. Our screen capture records 18 Instances:



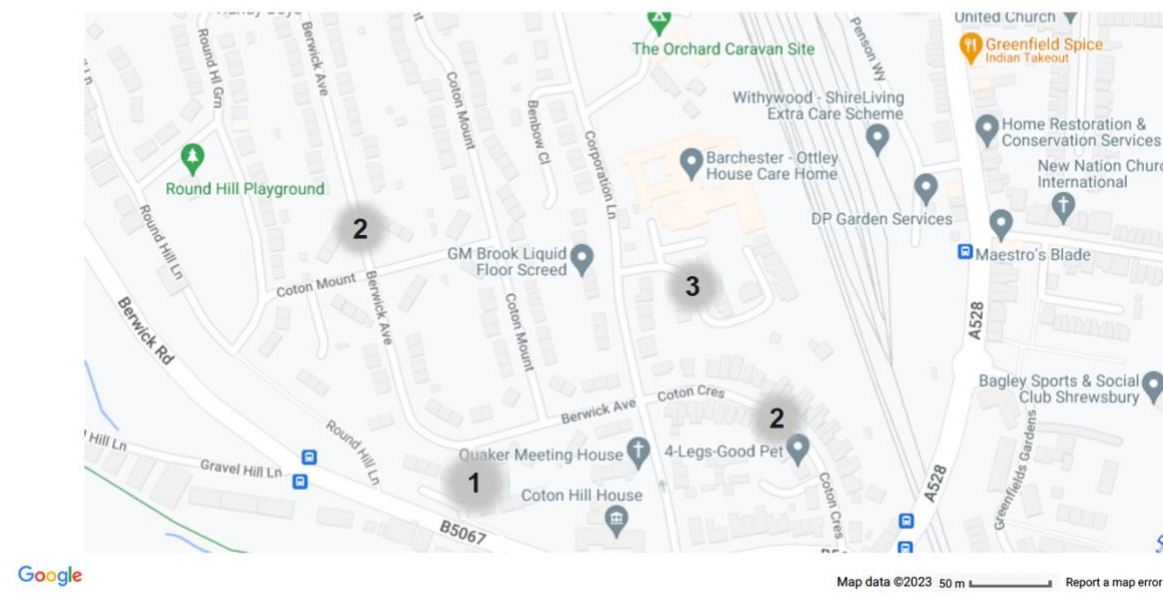
The screen capture from Appendix IV of the Supporting Statement for the same period records 8 instances:

Form Fields

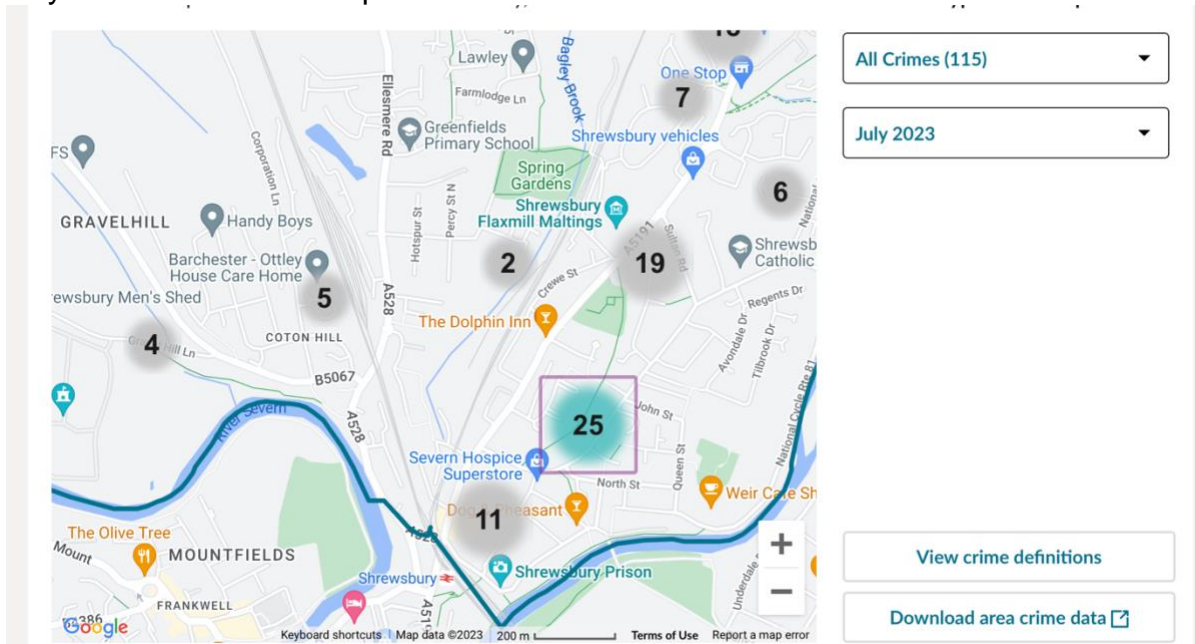
Crime type

Month and year

Click on a hotspot to see more details. Alternatively, [view as A-Z list](#)



July 2023. Our screen capture records >55< Instances:



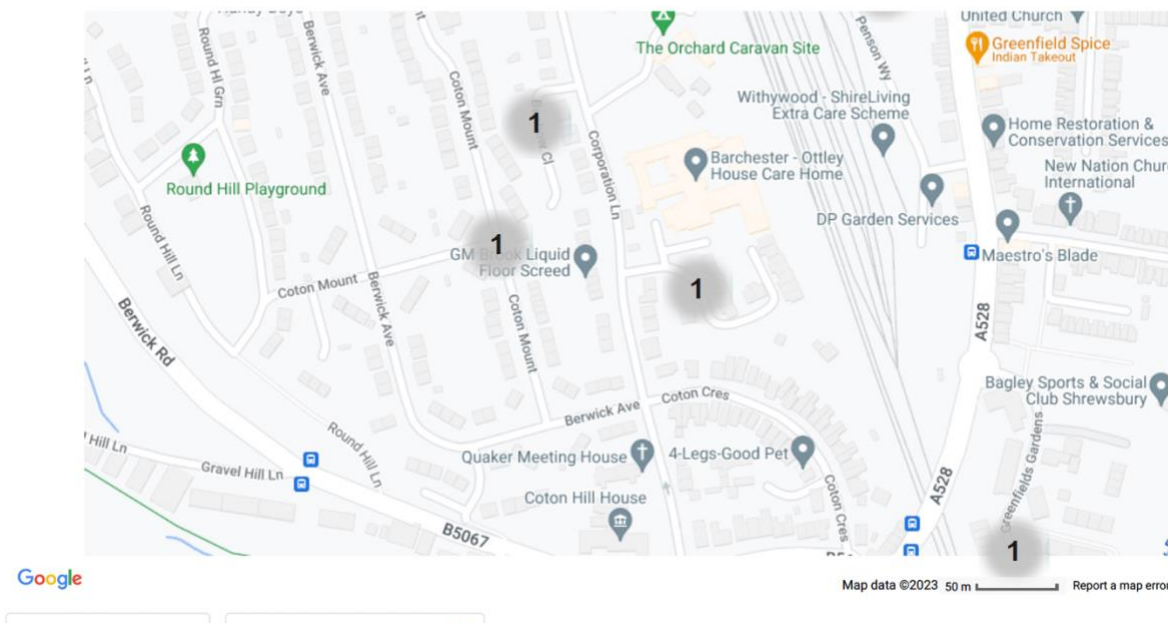
The screen capture from Appendix IV of the Supporting Statement for the same period records 4 instances:

Form Fields

Crime type All Crimes (115)

Month and year July 2023

Click on a hotspot to see more details. Alternatively, [view as A-Z list](#)



APPENDIX II

APPENDIX II

An exchange between concerned resident Sharon Peck and Laura Fisher, where the consultation in June 2023 was clearly billed as informal. The expectations of residents, particularly given the shambolic and brief nature of this consultation was that there would be a follow-up formal consultation. There was not, and Laura Fisher declined attending the public meeting in Coton Hill.

----- Forwarded message -----

From: **sharon peck** speck330@gmail.com

Hi, please see photos of my emails to and from Laura Fisher re my concerns about the consultation process.

I have had concerns since the 168 letters were sent out and she brushed this off by saying it was informal consultation but they are now appear to be using it as a formal consultation?

Also in the additional document on the new management plan she states that letters were sent to the nearest houses this also isn't the case as they were sent to the main road near Laura's place, no one on Berwick avenue, Corporation Lane or Berwick Road got them. The whole consultation process has been not followed properly and this is a legal requirement on their part.

15:20

73%



sharon peck 30 May

to Laura



Hi Laura

I'm led to believe there is a consultation about Coton Hill House at the Gateway next week.

I find it rather concerning that majority of Coton Hill residents haven't been informed by letter about this by Shropshire Council. Can I ask why this is? And why with such a short date haven't people been informed of this?

Councillor Alex Wagner provided a leaflet informing us of information but only after a local resident who was made aware of this told him about it. Surely this goes against Local Government Consultation Principles

Yours Sharon Peck

15:20

73%



Laura Fisher 3 Jun

to me



Dear Ms Peck

Apologies for the delay in replying to your email.

I can confirm there is an informal consultation event taking place on 7th June 2023. The aim of this is to feedback from the event 12 months ago and discuss the changes we have made to our plans for the building. Comments from this event will be taken into account when we apply for planning permission.

When the planning application is submitted there will be another consultation period and this is a formal consultation which forms part of the planning application.

We sent out 168 letters in regard to the event on 7th June and they were delivered by hand over the weekend 26-29th May to ensure they were received in time (ie, rather than post them).

Kind Regards

Laura Fisher



15:20

73%



image002.png



Laura Fisher 4 Jun

to me



Dear Ms Peck

This is an informal consultation event and therefore we have delivered letters to streets close to CHH. If planning permission is submitted there will be a formal consultation which will be wider than this.

Please advise me of the 'recent events' you refer to so I can look into it.

Show quoted text

Show quoted text



sharon peck 4 Jun

Hi Laura The recent events are the person who was in my back garden that I informed



99+





 If you are not the intended recipient of this email
 please do not send it on
 to others, open any attachments or file the email
 locally.
 Please inform the sender of the error and then
 delete the original email.



sharon peck 3 Jun



to Laura

Hi Laura

Why were only 168 leaflets delivered this is less than the houses on Berwick avenue and Coton Mount Estate alone, let alone Round Hill green etc, all of which have been effected recently by the recent events at Coton hill house.

Where were these leaflets distributed as no one I'm aware of has received one except A Mr Tony Barnes who lives on the main road.

Sharon Peck

Show quoted text



15:20

73%



Show quoted text

Show quoted text



sharon peck 4 Jun



to Laura

Hi Laura

The recent events are the person who was in my back garden that I informed you and the police about and was evicted from coton hill house. Which other residents in the area had issues with also stealing a Mobile phone etc.

Also I know the person living opposite coton hill house didn't recieve a letter so how is your letter sending process working. Surely it should be priority to include those who have had issues with Coton Hill House previously. I have myself leafleted in coton hill area and know 168 letters wouldn't even cover Berwick Avenue and Coton mount estate. So you haven't even informed a quarter of the residents. Informal or not residents have a right to be notified and attend as it effects them and there local area.

Yours

Sharon Peck

Show quoted text



APPENDIX III

Consists of a petition signed by 408 Coton Hill residents. This has been sent electronically as photos as there is insufficient time for it to be sent by post. (We had less than a week to assemble this petition).

The petition reads:

PORCH (Project Overview and Response to Coton Hill House proposals)

We, the undersigned, as local residents and members of the community who live and work in and around the Coton Hill area, strongly object to the proposed plans for Coton Hill House to be converted into homeless supported housing.

We would also like to assert that we have no confidence in Shropshire Council's approach for the following reasons:

- Unlawful continued use of Coton Hill House to house homeless residents without obtaining change of use permission.
- Refusal to address anti-social behaviour resulting from residents of Coton Hill House during time of unlawful use.
- Refusal to maintain open communications with local residents regarding plans for Coton Hill House.
- Deceptive practice by producing a planning application with substantive differences from verbal assurances given to the media, and to local residents.
- Producing an inadequate management plan, riddled with inaccuracies, contradictions, and without any justification for the detrimental effect of the concentrated placement of 25 vulnerable homeless within a wholly residential community, contrary to international best practice for vulnerable homeless support.

This page is intentionally left blank

23/03074/FUL Coton Hill House Conversion Applicant's Additional Supporting Statement October 2023

1. In response to the additional comments received in respect of the revised management plan and supporting statement the applicant would like to make the below additional comments and information.

Response to concerns

2. We welcome the comments from PORCH and others that recognise that the further clarifications in the updated management plan have helped address concerns raised. The further comments received start to get into the detail of this and at this stage we would summarise the response to the main themes.
3. The Council will be very willing to continue to meet with representatives of the local community to fine tune our management plan before the facility opens and to provide further reassurance that the facility will be well run and a part of the community. The management plan includes for meetings with the local community to discuss concerns, take on board feedback and make changes. If approved we would propose that the first of these meetings is held prior to opening to allow further comments and concerns to be raised, for the community to meet the staff working at Coton Hill House, and to see how the scheme has developed. This will also allow for fine tuning of plans in response to comments prior to first residents arriving.

Evidence of need

4. Currently Shropshire Council are housing 266 households in Temporary Accommodation.
5. 165 of these households are currently staying in bed and breakfast setting.
6. 128 of these households are single people. 24 of these individuals are housed Out of County where limited support from other services are provided due to their catchment areas, but as a council, Shropshire Council have a duty to provide interim accommodation. This data is correct as of Monday 9th October and the number of cases the Temporary Accommodation Housing Support Team hold.
7. As a service, we have been supporting households while in temporary accommodation for many years and this has given us the ability to form a strong management plan for this project to ensure in-house support and also that residents are tenancy ready and move on plans are set in place and followed.

Staffing

8. We can confirm 12 staff will be employed. Given that we have 12 additional staff for this project, we are confident that staff will be available to carry out the duties that are required. We can confirm that 2 officers will be on site at all times. One of these will always be a housing support worker.
9. The level of staffing has been increased following the consultation to address concerns of the local community. This level of provision and the provision of 24/7 coverage is only possible where we are housing 25 residents in one facility.

Training

10. Full training of all staff will be completed prior to the facility opening. We can provide further details prior the staff being employed. This will include: trauma informed support; domestic abuse, mental health, substance abuse awareness, safeguarding, support planning, tenancy ready programmes, enforcing tenancy conditions, the Care Act, Mental Capacity Act, amongst other training needs. This is just some of the training that existing staff are already undertaking.

11. Consultation working with the community

12. In addition to the statutory requirements to consult with local residents, we have also undertaken informal consultation. A full week of meetings in June 2022 and an afternoon/early evening in June 2023. We have amended our plans at each event and again following the planning application.
13. We are committed to continuing the dialogue with the local community after the planning process. We are very willing to work with the local community to address concerns and ensure Coton Hill House is successful.

14. The Ark

15. Although the Ark have expressed their support and recognise the need for this accommodation, The Ark are not involved in the management of the building including the referral process, the support provided or our management of tenancy breaches.

16. Crime and anti-social behaviour

17. There is not evidence to show that crime or anti-social behaviour has increased whilst Coton Hill House was used on a temporary basis. We are aware of some incidents and these have been addressed in a robust manner.
18. When residents break the condition of their non secure tenancy, we may give warnings if these are then ignored we would normally give reasonable notice to leave the accommodation. Usually this would be 7 days. However serious incidents would require the person to leave on the same day.

The funding

19. The ongoing management of the scheme will be funded from established income sources, the main source being the rent and service charges that residents will be liable for, which can be funded by Housing Benefit where residents are entitled to this.