

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

Additional correspondence received from members of the public summarised as follows (full comments are available to view on the planning file):

Management Plan

Not clear on role and responsibility of Shropshire Council Staff and Star Housing

No details to measure the success or failure of the proposal and how any failures would be addressed.

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.

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.

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.

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.

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.

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.

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.

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.

There are gaps in the shifts and the level of training and roles are not clearly defined.

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”?

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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

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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 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.