

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 20<sup>th</sup> 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 5<sup>th</sup> 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 22<sup>nd</sup> 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 20<sup>th</sup> 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 2<sup>nd</sup> 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.

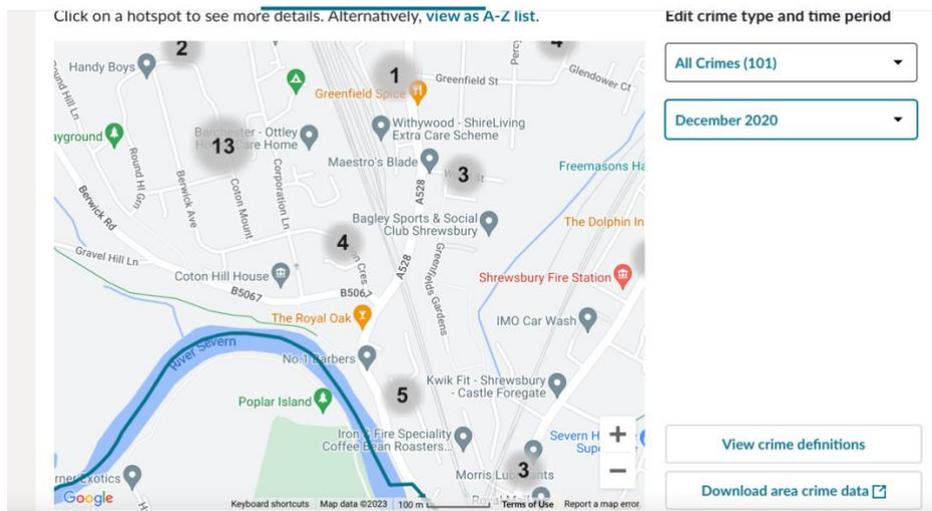
**Appendix III** has been sent separately. It consists of photos of the 408 signatures from Coton Hill on a petition. This has had to be hastily assembled given the shortened time to respond.

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

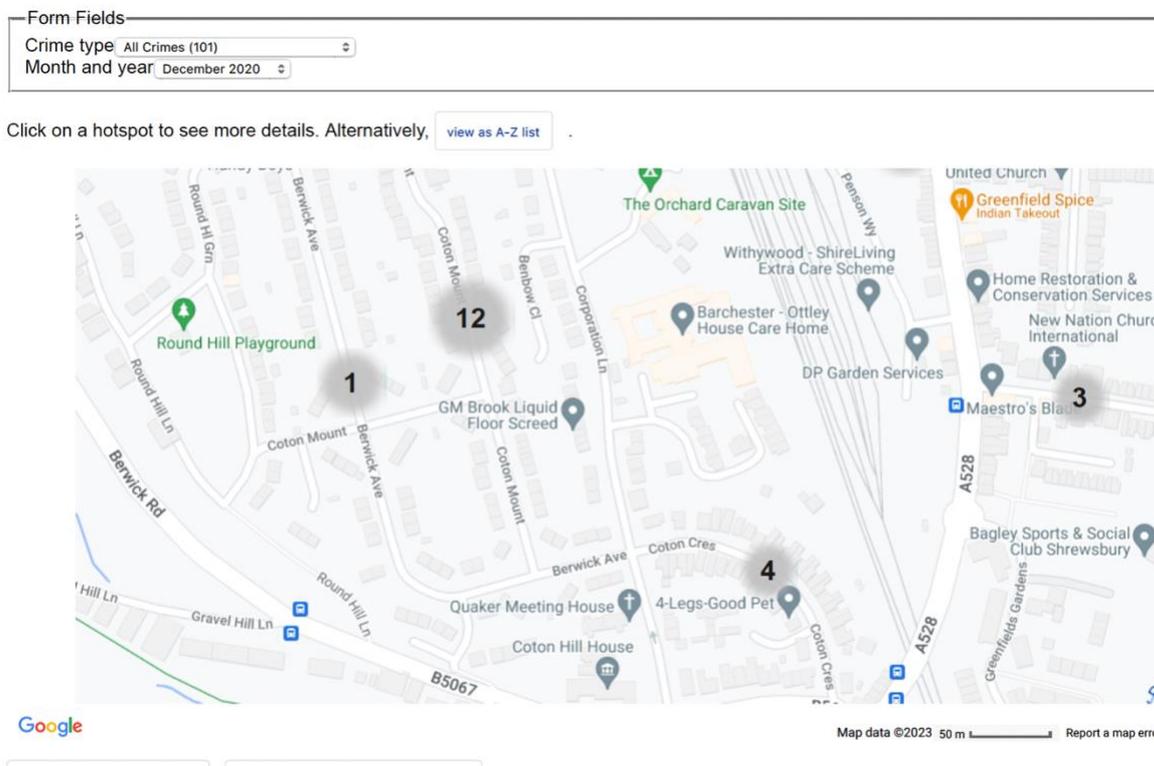
## APPENDIX I

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

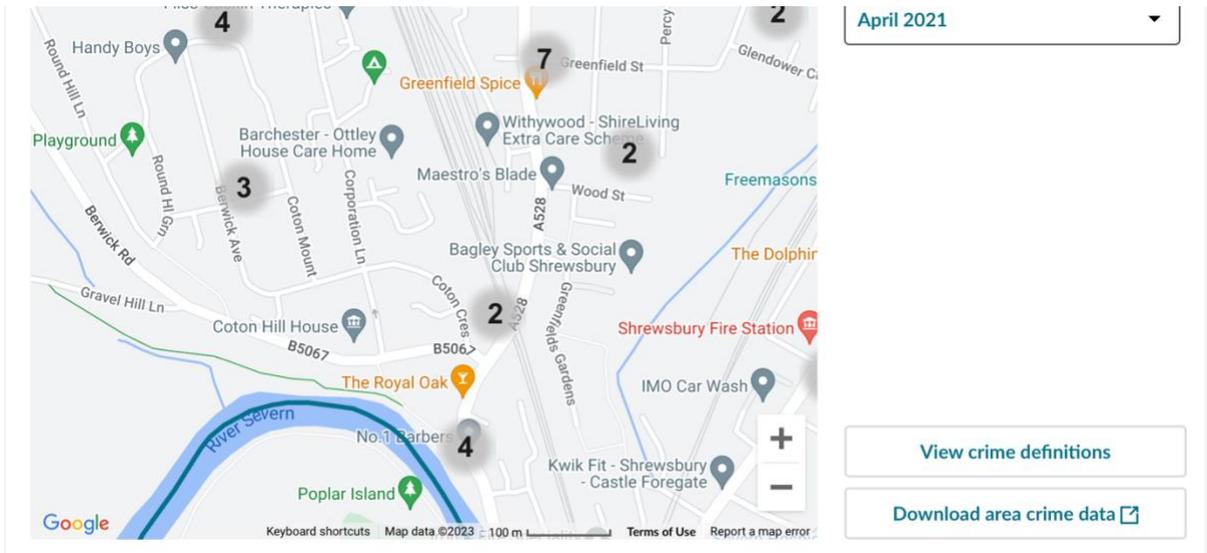
December 2020: Our screen capture records 31 Instances:



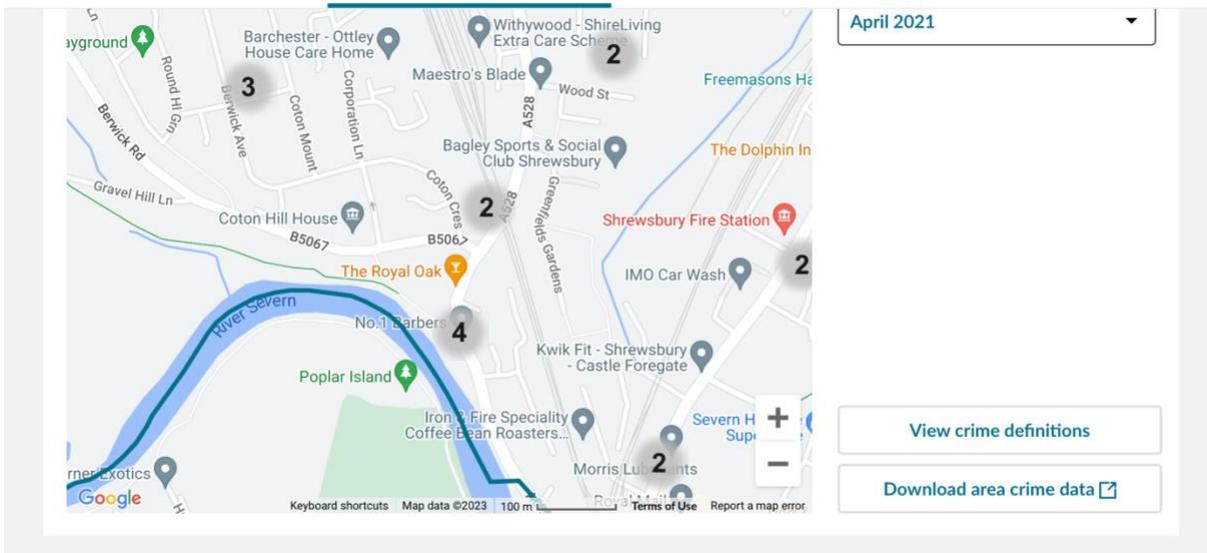
The screen capture from Appendix IV of the Supporting Statement for the same period records 20 instances:



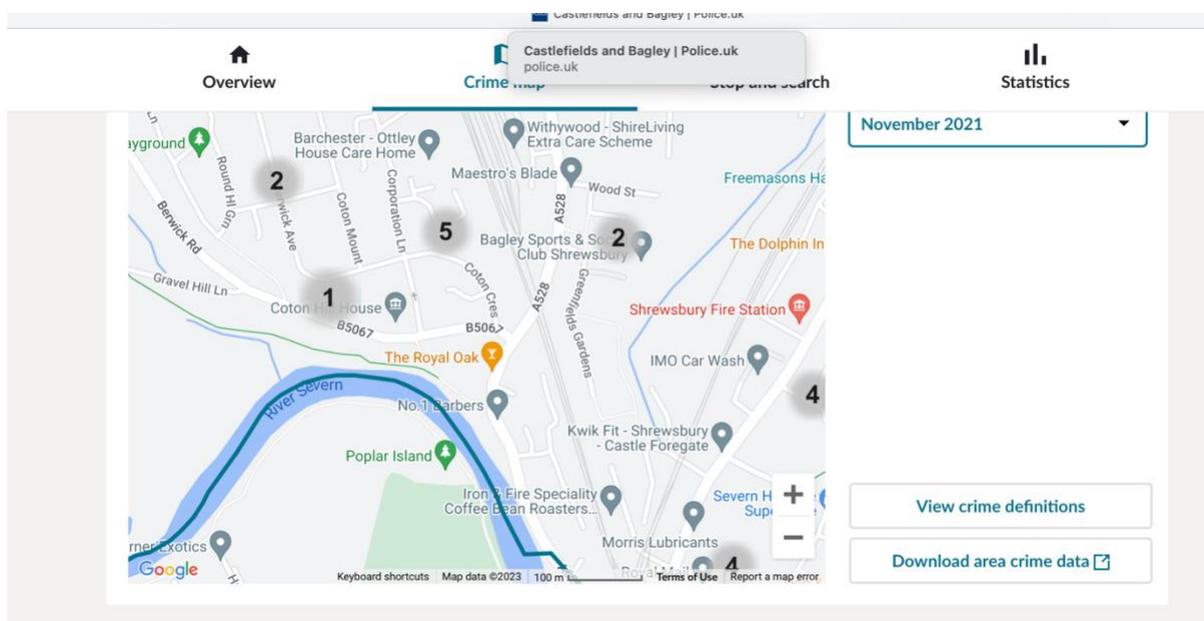
April 2021. Our screen capture records 31 Instances:



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:



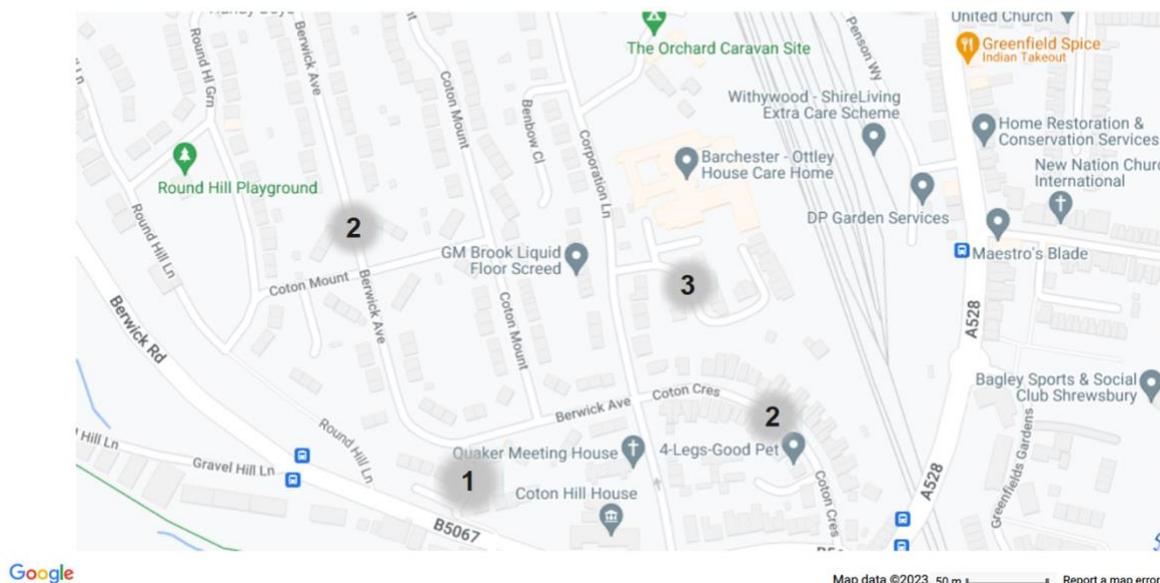
The screen capture from Appendix IV of the Supporting Statement for the same period records 8 instances:

Form Fields

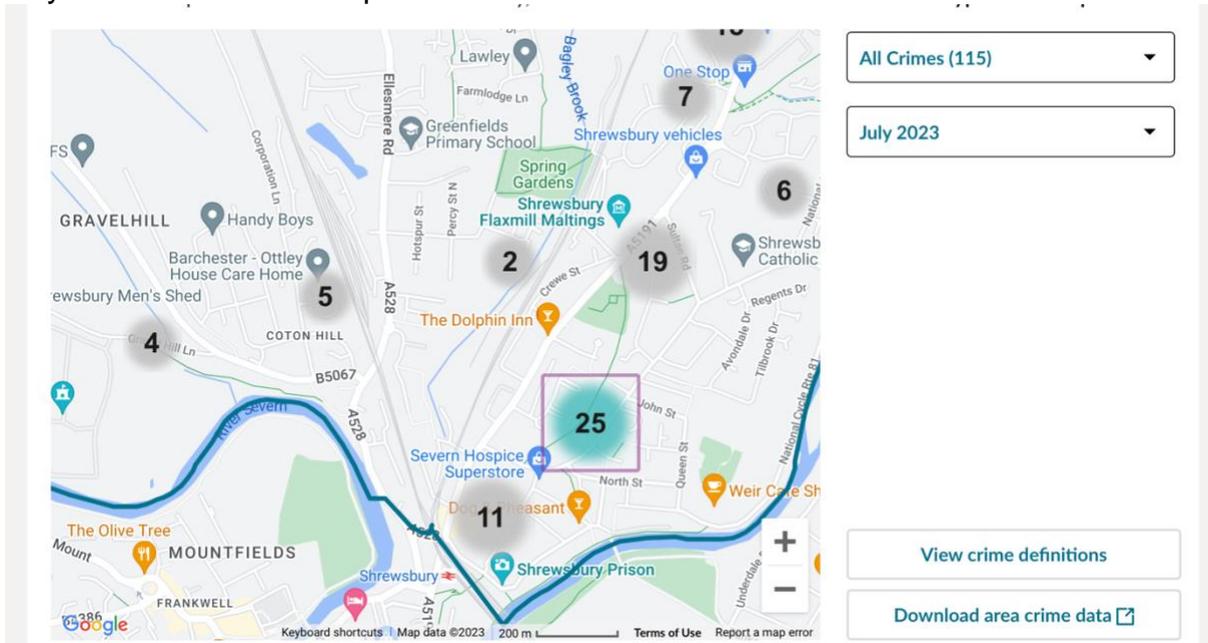
Crime type: All Crimes (90)

Month and year: November 2021

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



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



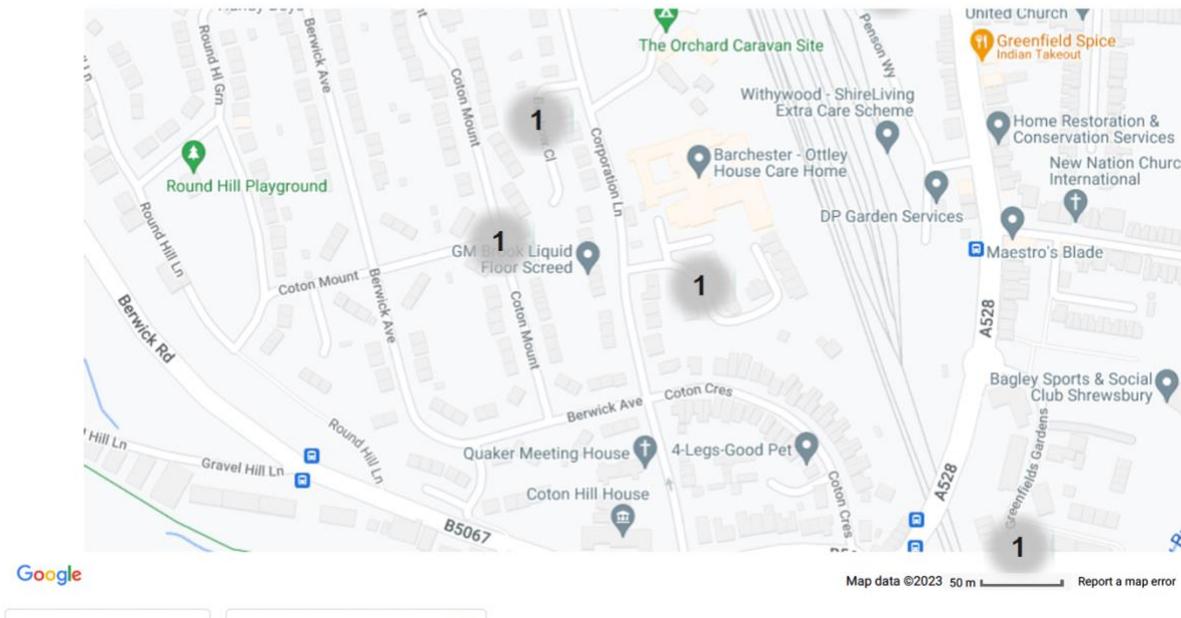
The screen capture from Appendix IV of the Supporting Statement for the same period records 4 instances:

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](mailto: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 7<sup>th</sup> 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 7<sup>th</sup> June and they were delivered by hand over the weekend 26-29<sup>th</sup> 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+



15:20

73%



\*\*\*\*\*  
 \*\*\*\*\*  
 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%



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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.