

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	Bruton Knowles
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input checked="" type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):

Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

Please see attached report

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.

**SHROPSHIRE LOCAL PLAN:
UPDATED GREEN BELT TOPIC PAPER
and
HOUSING AND EMPLOYMENT TOPIC PAPER**

1.0 Introduction

This submission is to be read in conjunction with the Hearing Statements for Matters 1 (Legal Compliance/Procedural Requirements), 2 (Duty to Cooperate), 3 (Development Strategy), 4 (Housing and Employment Need), 6 (Green Belt and Safeguarded Land) and 7 (Strategic Settlements) ; and further statement submitted in response to Matters, Issues and Questions related to the Stage 1 proceedings of the Shropshire Local Plan Examination and the Duty to Cooperate submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council.

We do not intend to repeat any of the statements previously made save to state that they are all remain valid and the submissions made to date by SCC have not overcome those comments. Also comments made under one heading are not repeated in the next where they remain relevant and all comments in this response are to be read in respect of the two topic papers but we have sought to make the comments at the most relevant juncture.

2.0 Infrastructure Funding

It is noted that the SCC Annual Infrastructure Funding Statement of December 2023 [GC48] does not identify any infrastructure programmes for Shifnal to address issues arising from the proposed development or to meet existing infrastructure shortfalls [i.e. highways, recreation, etc].

If 39 ha of employment land and 82.4 ha of safeguarded land are to be located at Shifnal the infrastructure requirement, timescale [and responsibility] for delivery should be set out , which we do not believe has been.

3.0 Sustainability Appraisal

It is our understanding that a sustainability appraisal was not undertaken prior to SCC allocating the site at Shifnal which runs contrary to the planning process. SCC have not justified why they have undertaken this process in the in the incorrect sequence and we ask that the Inspector considers this.

The SLP Updated Additional Sustainability Appraisal Report April 24 [GC43] does not carry out a comprehensive review of all potential locations in Shropshire it merely puts forward an either or solution - one of which has no impact and another a majority negative impact. For a thorough

sustainability review a number of locations should be considered to score the relative merits of alternative proposals.

This would show that Shifnal is not the appropriate location in terms of a sustainable appraisal.

Furthermore even if solely Shifnal was to be considered a comprehensive review of all sites in and around Shifnal is required [i.e. why should the employment be on one side of the Town and residential allocations on the other; why should previously identified land and safeguarded land be leapfrogged with the new proposal; what review of existing brownfield locations has been undertaken].

It is my understanding that the Inspector asked SCC to confirm what other sites had been considered before SCC had chosen the 39ha at Shifnal. We do not believe that has yet been done and we ask the Inspector to ask again for that information.

From a sustainability perspective surely the additional employment should be allocated near to/adjoining the residential allocations. As presently presented the housing requirements are to be accommodated in Bridgnorth, Shrewsbury and Ironbridge yet the associated employment uses are all in Shifnal. This is illogical and unsustainable.

Additionally it is difficult to understand how adding employment land has a benefit as stated of “encouraging sustainable transport” and “supporting active and healthy communities” when no infrastructure is proposed. A location with an enhanced public transport hub [i.e. Telford, Shrewsbury, Bridgnorth etc] would provide for more sustainable transport options.

The sustainability appraisal has not considered whether locating employment land adjacent to proposed residential allocations [outside of the green belt] would be preferred which is surely the starting point?

The sustainability appraisal does not consider the safeguarded land, merely the additional 30 ha that is immediately identified. This is another shortfall in this updated document.

4.0 Updated Green Belt Topic Paper April 24

Further to the above comments some of which are specifically relevant to this topic paper.

The unwillingness to revisit the alternative non Green Belt locations is a shortfall in SCC’s approach.

The Green Belt paper focus on the justification for releasing 39 ha [of which 30 ha is to meet the unproven Black Country contribution]. It does not address the proposal to identify a total of 121.4 ha of land. This is a significant area of Green Belt land and a shortfall in the paper.

The report should set out the exceptional circumstances for the 39 ha; and then undertake the same exercise for the safeguarded land.

Alternatively the safeguarded land should be excluded from the LP review as it is not needed in this plan period and SCC have demonstrated that additional housing and employment uses can be accommodated on existing allocated sites.

There is no reason to believe that further employment needs cannot be met from existing employment locations.

Para 5.15 reconfirms the need to provide “full evidence and justify” the release. This has not been done. The paper’s starting point is that the unproven Black Country needs must be met at Shifnal. The Paper at 5.9 refers to assessment of alternatives but this has not been done as set out above.

It does not seek to take into account the existing employment uses at RAF Cosford nor within Shifnal.

There is existing brownfield land that can be utilised in Shifnal, Shropshire and the Black Country -these have not been re-assessed.

These are better locations for this scale of development [which are outside the Green Belt in entirety] due to existing infrastructure and accessibility reasons, both within Shropshire County and the surrounding area of Telford, J 12 of the M6 [which will have a railhead] and J2 of the M54 [known as I54].

5.0 Housing and Employment Topic Paper April 24

Para 2.31 appears to state that there is 413 ha of total employment land supply and a requirement for 320ha [based on a continuation of the high growth option and including the 30ha stated as needed for the Black country]. Thus, at face value there is more than sufficient land available to meet the stated need.

Additionally there is a buffer of 93 ha [30%] with no justification put forward as to why such a quantum is needed. [I note that para 17.6 states 35% but 18.1 states 30%]

Even if the above is not the case Para 2.27 concludes that the windfall allowances can accommodate the additional 20 ha of employment land needed to meet SCC requirement. If that is the case where is the evidence and why cannot the ‘Black Country’s requirement’ be met the same way?

There is no evidence/analysis to come to this conclusion. Para 15.34 states “the identified employment land supply.....capable of accommodating the proposed 20ha uplift”. If so what analysis exists to say that it can or can’t accommodate 50ha [i.e. the Black Country requirement also]?

Alternatively, can densification [Option 2] be utilised to meet the 30 ha in part or full. [i.e. Why can the density not be increased to meet any needs arising [if proven] from the Black country?]

Paragraph 15.37 envisages density improvements in Bridgnorth but again puts forward no analysis nor does it state what land is envisaged would be made available due to this. Why not also in Shrewsbury- the Strategic Centre for Shropshire- or any of the other Principal Centres ?

The Paper does not look at Option 1 or 2 [or a combination of both] to meet the Black Country requirements but moves straight to Option 3 for this issue.

The Paper refers to Option 4 as being feasible and deliverable but then give it no more consideration {Para 15.46}.

It is understood that the 39 ha formed part of the original allocation to meet SCC needs but that appears not to be required now as this is now identified to only meet the Black Country needs.

Thus, if not needed to meet the Black Country needs the proposed allocation should fall away entirely.

Additionally, we do not understand why 39ha are to be allocated to meet a need for 30ha.

The figures are misleading and have changed over time - we assume to address issues as they arise. However, we are now at a point where they are plainly wrong. The paper refers to 41ha in table 15.1 and 39 ha in the table in para15.39 to meet the stated need of 30ha.

The fact that SCC have conveniently managed to identify windfall sites to meet the additional need from SCC but not those put forward as needed to meet the Black Country either through windfall or densification appears to suggest that but for the Black Country issue the draft Local Plan was sound - which it clearly isn't.

The site selection process that alights on Shifnal to meet the Black Country needs has not been analytically assessed. Instead the starting point is to assess whether Shifnal, only a Key Centre, can accommodate an employment allocation – not whether it is the best location to meet the Black Country needs.

The housing to meet the Black Country needs is to be located in three Principal Centres and then the related employment allocation in a separate location. This is not a sustainable solution.

I note from para 16.52 that no locations in Ironbridge were even considered despite it being Strategic settlement.

Additionally I note that Madeley was discounted because it would be reliant upon Telford for infrastructure. This is somewhat perverse as no infrastructure programme is proposed for Shifnal. We have assumed that SCC have assumed that the market would provide the necessary infrastructure as part of any new development. If this is the case then surely that applies to land in the Telford area also.

Furthermore Employment allocations along the M54 would not require significant infrastructure if in Strategic or Principle Centres. No additional infrastructure is proposed to facilitate the 39ha of employment – it is inconceivable that infrastructure improvements are not required [highways, services, etc]. If road improvements are needed this is likely to challenge the viability and deliverability of any development at this location.

Para 16.28 seeks to draw a distinction between an employment allocation and a residential one. It appears to state that people will migrate out of the Black Country for housing [i.e. relocate permanently] but will not travel for employment opportunities. If that is the case then once relocated to Bridgnorth, Shrewsbury and Ironbridge they would want to work in those settlements [not in Shifnal].

Whilst an assumption was made that employment and residential allocations did not need to be in the same location it does not appear that consideration was given as to why they couldn't be in the same location, rather that possibility was discounted completely.

All of the justification put forward in Paras 16.14-16.48 as to why Shifnal is suitable apply equally to all other locations in more major settlements. These would also not require the release of land in the Green Belt.

Turning to the issue of the proven of need from the Black Country It is our understanding that ABCA no longer exists as a functioning public body and that it cannot be taken that any need arises. If looking at the matter afresh surely the duty to cooperate with a non existent organisation does not arise. The various neighbouring local authorities are at various early stages of local plan preparation but we suggest the inspectorate cannot be satisfied that a need currently exists if there's no organisation to justify it or be tested upon their evidence and thus any figures stated by SCC are purely theoretical.

Finally, it is noted that the Council seek to justify the proposed allocation as an active promoter and developer exists. If that is the case the Council should be able to confirm what actions have been undertaken by Harrow and Stoford's since January 2023. A search of Harrow Estates website states that they signed a promotion agreement in 2019 to promote land around Shifnal for residential and employment used not solely Employment.

6.0 Conclusion

There are two key issues.

Firstly neither the Sustainability Appraisal nor the two topic papers start from the position afresh nor do they address the issues raised by the Inspector.

The starting position appears to be that additional employment land is needed to meet the needs of the Black Country and that will be sited in specific locations in Shifnal.

Even if the need is taken as proven at this stage SCC should reconsider the position by firstly assessing whether the additionally need can be met from windfall and/or densification.

If it can't SCC should have looked at the suitability of sites outside the Greenbelt. It even appears that not all Strategic Centres were assessed.

Then if no alternative sites are available the Green Belt review should be used to identify the sites that cause the least impact on the objectives of the Green Belt and this , alongside the Sustainability Appraisal, should be used to identify the least inappropriate sites for additional development [recognising that no development is preferred on sustainability and green belt policies].

Even looking at Shifnal alone a natural conclusion is that the sites identified are not the most sustainable [i.e. why not allocate 18a and b with a hard defendable boundary on the east].

Furthermore, the same process should be undertaken for any safeguarded land and the approach by SCC is even more arbitrary.

Secondly the information presented by SCC is confusing and flawed. It is based on a stated need from an organisation that no longer exists and cannot be called upon to justify or confirm their needs.

Additionally, the original justification for 39ha of land [or 41ha] of land in Shifnal – to meet the needs of SCC- has apparently vanished and been replaced with a need for 30ha [but on an allocation of 39ha].

It appears that the supply and need figures for employment land are being constantly changed by SCC to meet the narrative at the time.

But on the information presented there is no need to allocate any land to meet the [unproven] needs of the Black Country nor is there a need for the safeguarded land, as there is more than enough supply already identified to meet the need with an over provision of some 30-35%.

Dated 29/5/23