

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:	
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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.	
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	
c. Updated Housing and Employment Topic Paper.	
d. Updated Green Belt Topic Paper.	

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 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.

APPENDIX A

Response of Trevor Tarran on Additional Draft Local Plan Consultation

General

1.1 This response and justifying reasoning, is principally to object to the continued allocation of 39ha of Green Belt for employment at Shifnal.

1.2 Although national policy is to ensure that the local community is fully engaged in the local plan process, the sheer volume of the additional documents submitted by the Council, makes it very difficult for the lay public to be able to digest, analyse and then be able to provide a constructive planning response. This is compounded by two factors.

1.3 Firstly, in submitting the Draft Plan for examination, the Council should have legally submitted all relevant information to justify the proposals in the Plan. Yet despite those proposals, and in particular no changes in site allocations, the Council has been allowed to submit a significant amount of new evidence including previous topic papers. It is almost impossible for the public to be able to assimilate all this additional supplementary information and to be able to compare and contrast the information in various iterations of sustainability appraisals and topic papers to be able to assess what changes and different information is now being provided (especially as changes between topic papers are not highlighted). It appears that the Council is swamping the public with a huge amount of new evidence as a means of diluting the ability of the public to have a full input into proposals that will have a significant impact on their local communities.

1.4 Secondly, it is noteworthy that the Council has been allowed to spend a considerable number of months being able to prepare all this additional information (which should not have been necessary if the Plan was legal and sound at the time of submission for examination, as was regularly claimed by the Council at the time). However, the public are only being allowed the bare minimum 6 weeks to read, compare and analyse all this additional evidence. It must be questionable, therefore, whether the time allowed for the public to respond related to the amount of information submitted at this late stage in the examination process, is legal. As pointed out in the legal submissions in my response on the Reg 19 consultation, it is doubtful that the Council is complying with the Gunning Principles of common law.

1.5 There appears to have been minimal change in actual proposals in the Plan relating to size and location of site allocations, particularly for Shifnal; the “new” evidence appears to be simply a rehash of that previously submitted. Therefore, the evidence set out in my detailed Reg 19 response and the hearing statements on Matters 1,2,3,4,6,and still apply and should be read in connection with the current consultation response.

1.6 This is also justified by the fact that the Council has yet again failed to respond to and answer the detailed arguments in those statements challenging the evidence and reasoning put forward by the Council in support of their proposals. Rather than putting forward answers to the various queries and inconsistencies raised against the site allocation proposals, the Council has simply set out similar points it previously put forward. None of the detailed queries and inconsistencies highlighted previously have been answered in any of the additional information submitted. The Council has simply stuck to its original proposals and then retrofitted any additional information to justify what it has already committed to. Instead of getting the evidence first and then using that to base its proposals on, the Council has first decided what it wants its proposals to be and then retrofitted the evidence subsequently to try to justify its decisions.

1.7 The detailed legal objections raised in my Reg 19 response have not been answered. This is especially relevant to the site allocated for employment in Shifnal in relation to sustainability appraisal, which I have reiterated in my further comments below.

1.8 In view of the proposal to now include alleged Black Country unmet employment need in Shifnal, this raises yet more queries and inconsistencies in the Council's evidence, which are set out below.

Shifnal Employment Site Allocation

2.0 In paragraphs 5.19 onwards in my Reg 19 response, I pointed out inconsistencies and discrepancies in the Council's stated employment land requirements for Shifnal: as Green Belt was proposed to be removed for such allocation, it was essential that it was made clear the precise amount of land required. The Council has failed to clarify these discrepancies.

2.1 The Council originally said that 16ha of employment land was required to meet Shifnal's needs, 14ha additional and 2ha already allocated. It then claimed that due to a 40% net build rate, the 14ha proposed was a net provision and that a gross figure of 39ha was now required. It is now saying that the 39ha reflects the 16ha, whereas before it said that it was for the 14ha. It is also still proposing 41ha though recent planning permissions for housing on and around SAMDev employment allocated land, mean that the 2ha proposed in the Plan as existing allocation is no longer available for employment use. The Council has again failed to say where this additional 2ha will now be provided in Shifnal.

2.2 I previously pointed out that the Council has double counted its comments about net development acreage (para 5.26 of Reg 19 response). The Council have made it clear that the 39ha is really only 14ha (or 16ha depending on which evidence document is used) of gross employment allocation as they claim a 40% net build rate (no response has been made to this inconsistency – it is noted that this so called local adjustment for Shifnal has not been applied to other employment allocations in the Plan). However, they are now saying that 30ha of this 39ha will be to meet the Black Country unmet need. Yet in deciding to take 30ha, the Council has failed to state whether this 30ha is gross or net. There appears nothing in the Black Country needs evidence to state that their employment needs total of which the 30ha forms part, is a net figure taking account of net build rates. The Council have made it clear that the 39ha Shifnal site is a net build figure. This means that either the 30ha Black Country unmet need figure is really a gross 12ha, which would seem to be at odds with the Black Country figures to justify meeting an unmet need; or to be consistent and the Black Country employment figures are gross, then the Council would need to allocate some 75ha to provide 30ha gross Black Country unmet need. Again the Council has failed to specify the reasoning behind the figures used. With exceptional circumstances being required to justify removal of Green Belt, such lack of clarity in whether figures used are net or gross is unacceptable. The Council needs to specify whether the Black Country total unmet employment needs figure of which the 30ha forms part, is a gross figure or whether it is a net build figure matching that of Shropshire's employment needs figure. Looking at the Black Country employment needs figures used to justify taking 30ha, there is nothing there to suggest that they are net build totals. IN which case, it is inconsistent of the Council to allocate the 30ha as part of the Shifnal 39ha net build figure.

2.3 The Council in their original consultations and justification for releasing Green Belt, stated that there has been an imbalance between housing and employment in the town and that the 14ha gross/39ha net build allocation is to address this imbalance and meet Shifnal's needs. I have previously pointed out that this is inconsistent with past decisions and comments of the Council (para 5.30 onwards). However, the Council are now saying

that 30 of the 39ha site is required to meet Black Country unmet needs. This means that they are now in effect saying that to solely meet Shifnal's needs, only 9ha net (approx 3.6ha gross) is required . This completely undermines all the previous evidence they have used to justify 39ha for Shifnal only needs. They cannot firstly claim that 39ha is required to overcome the imbalance between housing and employment in the town, and then claim that this figure will now also incorporate 30ha to also have to accommodate Black Country unmet needs, so that only 9ha is all that is now needed to meet this alleged imbalance. It clearly shows that the evidence being used by the Council to try to support this employment land allocation is unjustifiable and does not stand up to scrutiny.

2.4 In the latest Topic Paper on Housing and Employment (para 16.189), the Council refers to there being a proactive landowner and prospective developer. However, there is no guarantee that once a site is allocated, it would be developed by that owner/developer or indeed for the allocated use. This is supported by the fact that in supporting their original allocation of this site, the Council said the same thing about the then ownership/developer of Ruckley Estates/Morris Properties, yet it is understood that Ruckley Estates has since sold the land or agreed an option to purchase with another developer, Harrow Estates. Thus there is no guarantee that Harrow Estates and Stofold will actually develop the site, or that once allocated (as was the case with Ruckley Estates/Morris Properties) pass the site onto to someone else. The Council's reference to a specific owner/developer to justify a site allocation is, therefore, misleading and unsupportable as evidence as an exceptional reason to lose Green Belt land.

2.5 It is noted that on their website, Harrow Estates have Shifnal down as a current project. However, the project is described as mixed residential/commercial, covering 310 ac (126ha), and including Green Belt land to the north of Stanton Rd. The Council in their comments on the ownership fail to mention this larger project proposed.

2.6 It is also noteworthy that on that website referring to their Shifnal project, Harrow Estates say that they "are working with the Council.....to promote this substantial landholding through the local plan process. Redrow has successfully developed the following housing developments...". There is nothing here to suggest that Harrow Estates are simply looking to develop 39ha of employment land, nor to discount that the Council are discussing the whole project and not just the employment land allocation part. As they are proposing a significant release of Green Belt, the Council should be transparent and confirm what discussions have been held with Harrow Estates, and the position regarding the additional 87ha of proposed residential land that the Council's "proactive owner" says is part of their development project for Shifnal.

2.7 The information provided by Harrow Estates on their website, also raises several questions: would Harrow Estates proceed with just 39ha of commercial without the 87ha of residential included in their overall project scheme? How would they pay for the huge infrastructure costs (see below) without the benefit of the supporting residential development? In view of their residential commitment (their comment about Redrow developing housing in the town), the likely exorbitant infrastructure costs and limited demand (see comments below), and the past planning history in Shifnal of the Council approving residential development on allocated employment land, it is highly likely that in a few years time, these points will lead to pressure for such a large employment site to be used for residential.

2.8 The Council in its Strategic Infrastructure and Investment Plan 2022 (GC4t) and other documents, stated that the following developer funded infrastructure is required for the development:

- industrial power supply;

- green infrastructure network retaining the historic field pattern and trees/hedgerows with public access into “wildlife” corridors within the site (*they do not say how public access to such corridors is compatible and safe within a major employment site!*) to compensate for the release of Green Belt for development. The provision of strong defensible boundaries to the Green Belt including structural planting along with sensitively designed boundary treatments to secure the employment area (*as pointed out in the Council’s Green Belt Assessment, the site to the east of Upton Lane already has strong defensible boundaries but this is not stopping the Council from ripping up those boundaries to allocate the site for development. This statement, therefore, has little worth as the Council can come along at any time in the future and use the precedent they are now creating to extend further into the Green Belt in the future*);
- strategic and local road improvements along the length of Stanton Road to facilitate the development and establish a dedicated route to the new employment area.
- significant and effective pedestrian links will be provided along Stanton Road.
- Strategic Transport Assessment and Transport evidence will be required to assess the effects of the development on the M54 junction 3 and A41 Stanton Road junction (*as well as the costs of such assessments, there is likely to be significant costs in upgrading the two junctions to accommodate the increased commercial traffic from the site*);
- provide strategic highway junctions around the existing Upton Lane with the temporary prevention of vehicular traffic across the road bridge viaduct over the railway line (*as Upton Lane is the only link between allocated and future proposed housing to the west of the town and the proposed employment site to the east, that does not require access through the town centre, this prevention of vehicular traffic will exacerbate traffic movements through the town centre contrary to sustainability objectives*);
- restrict commercial vehicle movements through the A464/Aston St/Town Centre/Fiveways and linked highways;
- provision of secondary vehicular and pedestrian/cycle access between the site and the existing industrial estate and pedestrian/cycle links to existing and local networks;
- provide public transport links to the town centre.

In addition to these developer funded requirements, improvements will also be required to the Shifnal Waste Water Treatment Works.

2.9 The Council has given no evidence of these possible infrastructure costs to show that the development of the site in the Green Belt is likely to be financially viable without either additional residential development being required to facilitate the development, or that once allocated and found to be financially unviable, the site is allowed to be re-allocated to residential use.

2.10 The Council do not say how they intend to enforce compliance with all these requirements, or phasing of the development to ensure that the alleged imbalance between housing and employment is addressed. Indeed the Council’s recent record of enforcing infrastructure requirements on planning permissions is poor. The Council approved in 2012 a 400 house development which required by conditions off street highway improvements. The condition required these works to be implemented when half the housing was completed but this was not enforced. The whole development has now been completed for several years but most of the highway improvements required have still not been implemented despite the matter being raised by the local Council and Councillor on a regular basis. Similarly, other major housing developments in the town, most completed for several years, were required to pay S106 money for highway improvements in the town. Of the 4 projects to be funded, only one has been completed

and no timescale has been confirmed for commencement of the other 3 schemes. With Council proposals to reduce planning and highway staffing to meet a significant budget shortfall, the Council's ability to enforce planning requirements in the future will be further restricted with there being little likelihood that the Council will have the requisite staff or inclination, to robustly enforce the implementation of this infrastructure at an appropriate time in the development of the site.

2.11 The Council have failed to provide evidence to justify that there is a demand for such a large employment site. They have made several wishful statements about the desirability of a strategic site here, but have not provided the evidence to back up that there is demand for such to override the Green Belt presumption against such development.

2.12 Evidence of other strategic sites suggest there will not be much demand to make it worthwhile as there are better sites available in the surrounding area at Telford, J12 of the M6 which will have a railhead and the i54 site at J2 of M54 (para 5.36 of my Reg19 response provides further examples). There are also potential sites opposite the current i54 site. The biggest problem with the site is the poor access down a country lane or through Shifnal with a narrow entrance into Aston Street. There was an indication from the Council that if the site was to be developed then the whole length of Stanton road from the site to the A5 turning was to be widened before works could start. This may or may not involve land acquisition with the the Council having to use CPO powers and likely to be objected to by Bradford Estate at the A5 end of the road, The cost and timing of these improvements would make the site uneconomical, leading to applications to use it for residential (as it is then out of the Green Belt and would conform with the "current project" standing of Harrow Estates for this area).

2.13 The Council state that they "understand" there is interest from local businesses but no details have been given of this interest. The Council firstly said that Morris Properties were keen to develop site but they are no longer involved. As pointed out in my Reg 19 response (para 5.41), the Council's own advertising site showed no interest. Indeed they confirmed as recently as October 2019 that no formal approaches or expressions of interest to invest in the site had been received. This hardly supports the Council's claim that there is interest and demand for the site. It again appears that the Council has made a predetermined decision to allocate this site and of this size without any prior justifiable evidence to support its proposal; it is little more than a wishful objective which would be less harmful if it did not rely on the release of a large amount of Green Belt (assessed as high harm) and inconsistencies in evidence and comments.

2.14 The Council have now concluded that the Shropshire employment land need is for 320ha an increase of some 20ha on their submitted Plan. The Council conclude that as there is a supply of 413 ha, this will provide sufficient flexibility so as not to require any additional site allocations for the extra 20ha. As the Council accept that this large over provision of supply to need can take an extra 20ha without requiring changes to site allocations, there is no reason why the Council cannot provide the 30ha of Black Country unmet need within this existing over supply without using Green Belt land. Again, this over supply and the flexibility it provides to allocating employment needs (as accepted by the Council), shows that there are not the exceptional circumstances to remove Green Belt land for providing the 30ha Black Country amount.

2.15 The Council have stated that the additional 20ha of Employment Land need now proposed (300 to 320ha) can be met without allocating further land due to the employment land supply being some 413ha giving sufficient flexibility. However, information locally in Shifnal alleges that the Council have asked Ruckley Estates to release a further 20ha of

land for employment use in Shifnal in addition to the 39ha proposed. Can the Council specifically refute this allegation and confirm that no such discussions have taken place or agreements reached?

2.16 In continuing to justify the provision of 30ha of employment land for the Black Country, the Council refer to the Black Country having mutual objectives for their emerging local plans. They also refer to the Inspectors having accepted the provisions proposed. However, these statements were based on the situation when the Plan was submitted and there was an overarching Black Country Authority providing evidence and support. This is no longer the situation, and as the Council are now readdressing the whole issue of housing/employment numbers and allocations, the Plan should now be assessed in relation to the current position and not one of relevance to several years ago. The Plan should reflect current planning policies and not past out of date evidence (see the Inspectors comments about Gypsy and Travellers and the need for the Council to provide up to date information). The Council are basing their Black Country figures and comments on a previous organisation that no longer exists and so such evidence can no longer be tested or justified. The additional documents now submitted by the Council have not been updated to what evidence the new individual authorities have in their own local plans, what the specific views of those authorities are now to unmet needs and what is the collective information coming from those individual authorities plans/evidence, compared to that previously submitted by the defunct joint Authority. The Council cannot now rely on previous evidence that can no longer be supported by an organisation that does not exist. The decision to continue to take 30ha of employment Black Country employment need and to allocate it solely to Shifnal, is based on out of date and possibly flawed data. The Council having reviewed its overall housing and employment figures, should have also updated its underlying evidence base by assessing and consulting the replacement individual Black Country authorities and using this up to date evidence to decide on whether and if so what amount of unmet needs should be taken in Shropshire. This failure amounts to unsoundness in allocating 30ha to Shifnal.

2.17 The Council have made great play for the need for sustainable development, minimise commuting, and to make sure, as in Shifnal, that housing and employment are balanced. Yet they are now proposing that the 1500 Black Country housing unmet needs will be allocated to Bridgnorth, Shrewsbury and Ironbridge, whilst the 30ha employment unmet needs will be allocated to Shifnal, several miles away from the housing. If the Council's reasoning for Shifnal about balancing housing and employment is to be believed, then to be consistent in their objectives, the Council should allocate the Black Country housing and employment on a similar balanced approach and ensure that the employment will be where the unmet housing is allocated.

2.18 The Council also say they will meet the cross boundary unmet need in a "measured and sustainable manner". This is not consistent with their proposal to separate the Black Country housing and employment allocations. Similarly, they say that they want to influence commuting patterns between Shropshire and the Black Country which would be in addition to support for the migration of some labour to new housing in Shropshire. By separating Black Country housing and employment allocations, they are encouraging commuting from the Black Country to Shropshire or between the housing sites and employment site within Shropshire. This is hardly a measured and sustainable response to meeting Black Country unmet needs.

2.19 The Council state that allocating the Black Country employment to Shifnal reflected the presence of an established community and labour force, there is existing infrastructure, services and facilities to support the new provision, and an opportunity for any new infrastructure, services and facilities required to support the development. However, these

same arguments apply equally, and in most cases with greater force, to alternative sites and in particular the three areas where the Black Country housing is proposed to be allocated. It is more sensible and result in economies of scale for the opportunity and need for new infrastructure, services and facilities to be jointly shared between the housing and employment developments rather than separated as proposed. Also, there is no existing labour force in Shifnal to support this proposed employment allocation. Only a small amount of new housing is proposed for the town and the labour force generated by the previous significant housing developments will have already found alternative employment and very few are likely to transfer to the new site. The provision of Black Country housing elsewhere means that that labour force will (on the Council's argument) find employment in those settlements or will need to commute to Shifnal. The small amount of housing proposed for Shifnal cannot balance such a large employment site, without leading to considerable in-commuting or significant additional housing to rebalance the other way.

2.20 In allocating a site for the Black Country unmet employment need, the Council say that in considering alternatives, no assumptions were made on the provision of an employment site to allow for flexibility and to minimise the release of Green Belt. However, it is clear from the subsequent comments on the alternatives that the Council simply retrofitted arguments against any possible alternative to ensure that their predetermined site of Shifnal became the preferred choice.

2.21 The Council refer to alternative sites for providing the Black Country employment as constituting the loss of moderate-high to high harm Green Belt. They fail to point out that the Shifnal site would lead to the loss of Green Belt land assessed as high harm and why this is more acceptable than the alternative sites; this supports again an indication that the Council are retrofitting its evidence and arguments to support a predetermined site without first considering the evidence for and against all possible sites with an open and unbiased professional planning judgement.

2.22 The Council refer to an alternative site in the Shifnal Place Plan area at "Madeley". There is no plan submitted showing where this site is located, but as a factual matter, there is no such place as Madeley within the Shifnal Place Plan. There is a town within Telford under that name but this is outside the Shifnal Place Plan area. The Council need to clarify, therefore, to which area of land they are referring to here.

2.23 The Council's phasing of proposed housing allocations for Shifnal states that it is intended 72 houses in years 1-5, the rest 158 in years 6-10 but none between years 2033-38. Considering the Council's objectives of measured and sustainable developments and balanced housing/employment, it is unreasonable not to allocate any housing in last third of Plan period, as this will put pressure for the early release of further land and loss of Green Belt. Also, the Council stress the need for balancing employment and housing and re-balancing an alleged imbalance, Yet the only employment proposed is one large strategic site that due to considerable infrastructure investment required, is unlikely to be available until the second/third period of Plan. The Council has provided no similar timescale/phasing proposed for the development of the employment site so how can they ensure that the alleged imbalance is corrected and achieved in the future.

2.24 My previous Reg 19 response queried how the Council can say that the proposed employment site is sustainable when the majority of existing and future housing is on the west side of the town, whilst the employment is on the east. The Council has again failed to address this inconsistency. In view of the comments above regarding the Harrow Estates Shifnal mixed residential/employment scheme and their statement that the Council are discussing "this substantial landholding " with the Estate, are the Council now considering further large scale housing on the east of the site?

2.25 The Council have also previously stated that highway and drainage structural problems of the town need to be addressed and solutions are likely to invite and help to accommodate significant growth. However, the only significant growth in the Plan is the employment land allocation, but this will not solve the underlying structural highway and drainage issues claimed by the Council: indeed they are likely to be exacerbated especially highways as the housing developments in the town and Black Country housing sites are to the west of the town leading to substantial commuting demands through the town to access the employment site.

2.26 The Council have previously stated that because of significant constraints at existing road junctions in the town, this indicates that development generating significant traffic movements is better located to the east of the town. Yet all planned future development of the town and new safeguarded land for that development, is on the west of the site. Yet another inconsistency in the Council's supporting evidence and again showing a lack of exceptional circumstances for the proposed releases of Green Belt land around the town.

2.27 The Council say that their claimed housing/employment imbalance in the town is due to consequences of the Council not being able to demonstrate 5 year land supply in 2013/14. However, as pointed out in my Reg 19 response (paras 5.30 onwards), when granting permissions for this housing, the Council's own evidence at the time, substantiated that there was no need for additional employment land, and even supported existing employment sites being developed for housing. Again it is inconsistent for the Council to claim that these housing developments led to an imbalance when it was their own decisions and evidence at the time that allowed housing at the same time as loss of employment. The Council has given no justification for this change of view, but having decided on allocating the current employment site, seems content to ignore its previous evidence and decisions and to again retrofit new data to support its premeditated allocation.

2.28 The Council also state that Shifnal "constitutes a settlement that is well-suited to accommodate employment development". This again does not equate with the Council's decisions only a few years ago to allow housing developments on employment sites on the basis that there was no demand or need for such employment. The Council fail to give any reasons why they have completely reversed their decision making on employment needs in the town.

2.29 The Council have stated that Shifnal's location means that it continues to be seen as a suitable growth point with development pressures in the West Midlands continuing to be expressed along the M54 corridor. However, this was exactly the same situation and pressures when the Council granted these significant housing development and allowed the loss of employment land to housing. The Council has given no justification how these same pressures led to them granting permission for housing on employment land only a few years ago, and yet now requires a huge new employment allocation and loss of Green Belt.

2.30 The housing developments referred to have been completed for a number of years so any imbalance will have sorted itself out with residents already in employment. It is very unlikely, therefore, that many of the residents of these developments will take employment at the proposed employment site, and the small amount of new housing left to be developed in the Plan period, will again not support the expected labour needed to support such a large employment site. So from being an alleged housing/employment imbalance, what the Council are proposing will inevitably lead to a reverse employment/housing

imbalance. This will either require significant additional housing developments in the town (and consequential loss of further Green Belt) or significant in commuting, contrary to the Council's sustainability objectives.

2.31 The Council refer in the Green Belt topic paper that the Shifnal employment site will support the role of Bridgnorth. However, Shifnal has at no time in the past or present, and will not in the future, provide any such role. The Council give no evidence to support this claim. Shifnal looks solely to Telford and Wolverhampton and has no relationship in terms of employment, retail or service to Bridgnorth. It also has little role in complementing Telford as the functional relationship between Telford and Shifnal is almost entirely one way from Shifnal to Telford.

2.32 As pointed out in my Reg 19 legal responses, the Council allocated the employment site in Shifnal before it had carried out a sustainability appraisal of the site as required legally and policy compliance. An appraisal was only performed for the site subsequent to its allocation resulting in the Council ensuring that its subsequent appraisals complied with the prior decision to allocate this site. All subsequent appraisals, therefore, are tarred with the same brush, that rather than carrying out a sustainability appraisal and then allocating sites based on the results, the Council did the reverse and allocated the site and then based its appraisals on the decision already taken.

2.33 The fact that the Council **predetermined** both the size and location of the employment site allocation before fully carrying prior sustainability appraisals, also meant that alternative sites put forward by the local community to provide 16ha of employment land were automatically dismissed without a proper and unbiased evaluation of those sites being carried out.

2.34 The Council state that whilst not considered an extension, the proposed employment site allocation does benefit from being co-located with the existing employment area to consolidate this investment location. However, the Council also say this site will be a high quality campus type development; this is entirely at odds with the quality and type of the existing site. In view of the complete contrast between the employment objectives of the two sites, it is inconsistent to present the two as a consolidated investment site; indeed the close proximity of the two sites and the proposed infrastructure links must cast doubt on the ability of the allocated site to attract the high end quality companies envisaged to support justification for the release of Green Belt.

2.35 The alternative site put forward by the local community would be a far more logical extension of the existing industrial estate and provide a more sustainable location in relation to its position to the town (again as evidenced in my Reg 19 response, particularly comparing the sustainability appraisals results of the two sites). Indeed, a local business man on that estate had meetings with the Council's planning policy officer who were sympathetic to such an extension to form what the Council called a Shifnal Enterprise Park. No reason has been given by the Council for their significant change in view. The proposed size and location of such a Park would be far more in keeping with the character and development/employment needs of the town than the Council's current proposal, be a more "measured and sustainable" development (as the Council has stated as one of their objectives to development), and result in less harm to the Green Belt. This alone should be reason to dismiss the Council's proposed site in favour of the local community's preferred alternative.

2.36 The Council state that Shifnal is constrained by its location in the Green Belt and limited investment in infrastructure in the town and the quality of retailing, services and facilities. However, its close proximity to the much larger urban settlements of Telford and

Wolverhampton means that there is no great commercial demand for such investment, especially of a regional/strategic nature. It is a small market town with appropriate infrastructure, services, facilities and employment to match its size and location. As the Council has pointed out, but ignored, the local community have made it clear in its responses to the Draft Plan (and the Shifnal Place Plan) that it wants this character maintained and the Green Belt retained to protect this inherent character. This was reinforced by the community's overwhelming endorsement of the Neighbourhood Plan, the future vision for the town and the planning objectives set out in the Plan. Placing a massive employment site here is entirely out of character; the Council has failed to provide any evidence to show how this site will be able to compete with existing and planned major regional and strategic employment sites in the nearby urban areas of Telford and Wolverhampton, where investment in infrastructure, services and facilities already exists or is in a planned timescale.