

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:	
------------------------	--

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.

7.19 a.ii and d.iii

It is stated that evidence “suggested unmet need for local housing, which includes affordable housing and the provision of accommodation types which are not readily available in the village.”

This evidence is contradicted by the fact that the full range of housing types have been on the open market for sale and rent in the last five years, including council owned accommodation for single and couple occupants, sheltered housing, shared ownership, terraced, semi-detached and detached houses and bungalows and park homes. Many, including shared ownership ‘starter homes’ have remained unsold for more than two years. (Button Hall). More than 113 homes of all tenures have been sold in the last 5 years.

This proves that provision of accommodation types is readily available. Sufficient housing need for now and the future could be met by only releasing (ALV 006 / ALV 007) from Green Belt without the need for removing land adjacent to The Cleckars (ALV 009) from the Green Belt.

The argument is not sound - it is not justified - it is not an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

7.19 a v-vi

It states that releasing two separate site allocations from Green Belt provides a choice of delivery options in locations which are both well connected to Alveley.

However, Land adjacent to The Cleckars (ALV009) is not well connected to Alveley being only accessible by vehicle from the busy A442 with no footpaths either side and situated dangerously close to a bend from the South. Any proposed new residents in houses built on (ALV009) are most likely to use their vehicles to access facilities in the village centre.

The National Planning Policy Framework states that “when it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport.”

(para138). Land adjacent to The Cleckars (ALV009) is not served by public transport at all. The 297 bus turns into Alveley at Daddlebrook Road and leaves the village at Fenn Green and vice versa. Recent planning requests in Shropshire have been rejected by Shropshire Council because inhabitants would be most likely to use cars to drive to local shops and infrastructure. Therefore, (ALV009) should not be released from Greenbelt. Land north of Daddlebrook Road and West of A442 (ALV006/ ALV007) should be released from Green Belt as future housing on these sites already fall within the village centre. They are accessible on foot from pavements immediately outside the land and are a short walk to the recreation ground, village shops and school. The 297 bus already stops right at the field entrance. Two local pubs, the village hall, Sports Club and Tennis Club are all adjacent.

The argument is not sound as it is not consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF. It is not justified – it is not an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

7.19 b.ii. c.iii. c.iv.

It is stated that b(ii) “The allocations also provide for additional sports and leisure provision which could support any future growth.” And c(iii) “The Green Belt revised Exceptional Circumstances Statement (EVO51) sets out that there is scope for additions and improvements to existing leisure facilities and activities to target the needs of a wider range of people so that as many residents as possible have access to appropriate and attractive leisure opportunities within the area.” And c(iv) “it is intended that the site that has been identified at Daddlebrook Road (proposed allocation ALV006/ ALV007 in the draft Shropshire Local Plan) which constitutes a residential-led mixed-use allocation would help deliver improved community facilities for sports and recreation, replacing and enhancing the more limited provision that currently exists at Alveley Sports Club. This would be a valuable community benefit which would help to support social sustainability and this forms part of the exceptional circumstances case.”

In the NPPF it states that “a local planning authority should regard the construction of new building as inappropriate in the Green Belt. Exceptions to this are: b) the provision of appropriate facilities for outdoor sport, outdoor recreation.”

Shropshire Council are emphasising that the proposed released land will be used for leisure and community use as well as housing and stating this is a reason to justify the exceptional circumstances to release it from Green Belt. However, this argument is unsound for a number of reasons.

1. There is already a proposal and plans in place to build a combined Sports Club and Village Hall building on the site of the current Alveley Sports Club and Village Hall south of Daddlebrook Road to enhance future community provision. Land within (ALV006 / ALV007) is, therefore, not needed for sports use and the entire space allocation can be used for housing needs. The extra capacity freed up on (ALV006 / ALV007) for homes will deem it completely unnecessary to release (ALV009) from Green Belt as a full allocation for sustainable growth can be met on land adjacent to Daddlebrook Road (ALV006/ ALV 007) and using a portion of safeguarded land immediately (ALV002).
2. Shropshire Council state that the village of Alveley needs an improved and wider provision of sport and recreation facilities. This statement is untrue. We already have three pubs, a Sports Club, a village hall, a tennis clubhouse and courts, a bowling green, a skittles alley, a petanque club, a recreation ground, a pavilion, allotments, children's play area, outdoor gym, equestrian school, 2 fisheries and accompanying cafes, a chapel community

centre and cafe, youth club, a day centre, a Country Park and visitor centre and cafe, national cycle routes, volunteer group and steam railway, a cricket club and new clubhouse. The parish magazine lists at least 17 parish organisations offering community activities for all ages and abilities. ALV009 is not needed for housing as there is already space on ALV006/ ALV007 for housing needs if it is used for residential use only and not mixed allocation.

3. Shropshire Council have already since the original draft paper on releasing land from Green Belt in Alveley, allowed the construction of a brand new cricket club house and field opened just last year in May 2023. This facility has been built on Green Belt land and is available for sport and private hire by the community. A further Green Belt field on the outskirts of the village should not be destroyed because of an inaccurate 'evidence' of sports need for our village. Any future unmet housing need can be accommodated on the land at Daddlebrook Rd (ALV006/ ALV007).

The argument is not sound. It is not consistent with national policy enabling the delivery of sustainable development in accordance with the policies in the NPPF. It is not justified. It is not an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

7.19 g.i.

It states that “In identifying proposed allocations and safeguarded land, the performance against Green Belt purposes and the harm to the remaining Green Belt was given due consideration.”

Land adjacent to The Cleckars (ALV009) is on the very perimeter of the village, bordered to the West by the Daddle Brook. It has long been a hunting ground for barn and tawny owls, hedgehogs and newts. It is used for agricultural purposes. This spring ewes and their lambs grazed here. It is the main route for the local farmer to drive his flock through to his fields further West on foot. Releasing land here from Green Belt will have a devastating effect on local wildlife. It would be better to release only land at Daddlebrook Rd (ALV006/ ALV007) and land for future safeguarding off Cooks Cross (ALV002). The land at Daddlebrook Rd is regularly used as a campsite, fairground site, bonfire site and festival site and as such has limited use as Green Belt land. The adjacent field which is planned to be used as safeguarded land off Cooks Cross, (ALV002) / P70 would also be better used for housing than (ALV009) as it is again of limited use as Green Belt being surrounded by the allotments, campsite and houses. (ALV006 / ALV007) and ALV002 / P70 both fall well within the current village boundary and, therefore, would offer up better provision for future homes.

Shropshire Council has recently rejected a planning request by the Royal Oak public house to build a washing facility and improved parking facilities on their campsite. Application Number 23 / 04211 / FUL. It was rejected on the basis that it would be harmful to the openness of the Green Belt and be an eyesore. This land could be deemed ‘brownfield’ as it has no Green Belt benefits and this land would be a far more appropriate site for extra housing need being directly opposite shared ownership and privately owned homes built in the village in the last 15 years. Choosing this land instead of ALV009 would be more true to the statement that Shropshire Council have exhausted all other options in the village and intend to avoid harming Green Belt land unnecessarily.

Shropshire Council state in the Green Belt Release Exceptional Circumstances Statement there is landscape sensitivity of the Seven Valley to the West, which has required them to look elsewhere for sites including among others ALV009. However, this argument is not justified as they have allowed the construction of a large number of residential park homes West of the village, bordering the Seven Valley Country Park since 2021.

The argument is not sound. It is not consistent with national policy enabling the delivery of sustainable development in accordance with the policies in the NPPF. It is not justified. It is not an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.