

Shropshire Council Local Plan Examination

Matters, Issues and Questions (MIQs)

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Introduction

- This Statement is being submitted in response to the Inspectors Matters, Issues and Questions related to the Stage 2 proceedings of the Shropshire Local Plan Examination.
- This statement has been prepared by Bruton Knowles on behalf of Shifnal Matters, Shifnal town Council and Tong Parish Council.
- The Inspectors have stated that comments made in earlier hearings or submissions will still be taken into account and this I do not intend to repeat previous statements made.
- Additionally it is noted that the Council will produce a statement in response to the MIQ and thus we reserve the right to respond to those at the Hearings

Matter 4 – Employment Land Need, Requirement and Supply (policy SP2) – see MMs 001 - 004

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall need, requirement and supply of employment land. Questions Employment Land

1. Is the updated approach to the employment land requirement and supply set out in the Council's Updated Housing and Employment Topic Paper – April 2024 (GC45) of minimum of 320 ha of employment land over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?
2. What provision is made within the Plan to fulfil the identified unmet employment needs of the Black Country, and will the Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?
3. Should the employment land requirement be also expressed in terms of the number of jobs expected to be provided.

BK Response: I refer to the attached previous submission paper SHROPSHIRE LOCAL PLAN:UPDATED GREEN BELT TOPIC PAPER and HOUSING AND EMPLOYMENT TOPIC PAPER.

The justification for both Employment and Housing Land is not proven/justified.

Even if it were the justification for safeguarded land is even more suspect.

Originally SC stated that they needed 30ha of land for SCC needs; yet they now seek to have allocated [39ha] allegedly to meet the needs to the Black Country [ie an over provision for a need that has not been proven] and then are proposing to take a substantially larger area [121.4 ha] out of the greenbelt as safeguarded land to further meet the unproven needs of the Black Country.

The Council's original reason for allocating land and associated exceptional circumstances are no longer proven thus it is wholly wrong that, at this stage, they are seeking to amend to justification as there is no opportunity to review the exceptional circumstances now put forward to justify the the allocated sites or the safeguarded land.

The Programme Officer has stated that the Inspectors will not be discussing Green Belt and Safeguarded Land at future hearings as this was discussed at Stage 1. This cannot be considered fair if the updated Green Belt Topic Paper is to be accepted as validly submitted, as it was submitted after the Stage 1 Hearing.

Additionally the Programme Officer stated that the Inspectors will also not be discussing any sites that are not proposed to be allocated in the Plan as these are not before them for consideration. As the safeguarded land is not an Allocated Site the opportunity to discuss the revised justification and alleged exceptional circumstances is not open to scrutiny. This cannot be considered fair.

The effect of the current proposal is that the proposed release of the green belt has not been proven or justified based on the current stated need but reliance on a previous, now unproven need, for both Allocated sites and safeguarded land.

Thus, the Council must accept that their proposed release of land within the Green Belt and subsequent safeguarded land allocation is not justified and we invite them to remove those proposals from the Local Plan.

I reiterate that there is no justification for a release from the Green Belt of either the allocated or safeguarded sites.

