

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 2 – Development Strategy (policies SP1-10 & SP12-15) – see various MMs

Issue

Whether the Development Strategy is justified, effective and consistent with national policy.

N.B. Detailed issues concerning the individual proposed site allocations will be dealt with under matters 7-24

Questions

1. Do any of the policies in the Plan require updating as a result of changes in national planning policy since the previous hearings in July 2022?
2. Is it proposed that the overall spatial strategy and broad distribution of growth set out in Policy SP2 will remain the same following the additional work? If not, how would it change and are the changes justified, effective and consistent with national policy? Are any consequential changes to Policy SP2 or the supplementary text required?

3. Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?

4. Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt? If so, what are the exceptional circumstances for doing this?

BK Response:

It would appear that SCC are to make further comments on these points. No further comments at this Stage in respect of 1 and 2.

In terms of 3 the short answer is no. - see attached previous submission paper SHROPSHIRE LOCAL PLAN:UPDATED GREEN BELT TOPIC PAPER and HOUSING AND EMPLOYMENT TOPIC PAPER.

The justification for the allocation sites of 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 principally for SCC needs; yet they now seek to have allocated [39ha] allegedly to meet the needs to the Black Country [ie an over provision of 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 either the new exceptional circumstances that are now being put forward to justify 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.

