

STAGE 2 HEARING STATEMENT – TREVOR TARRAN

Matter 2

2.1 It is noted that the guidance states that detailed issues concerning individual site allocations are to be dealt with later. However, although Safeguarding Land was considered as a general issue in Stage 1 Matter 6, the guidance again stated that site specific representations were not being considered at that hearing. To the lay public, therefore, it was reasonable to assume that as site specific comments were not being considered at Stage 1, they would then be considered in Stage 2 Settlement hearings where site specific matters would be of more relevance.

2.2 It was of concern, therefore, that the guidance on Stage 2 settlement matters states that safeguarding land is not being considered, which begs the question after the Stage 1 hearings guidance, as to when site specific representations would be examined and the public allowed to challenge before the Inspectors, the soundness of the evidence being put forward by the Council to justify site specific Safeguarding Land proposals and the consequential release of Green Belt.

2.3 If the public are not being allowed their site specific representations to be examined and the soundness of the Council's exceptional circumstances for the release of specific sites from the Green Belt challenged, then in effect this is allowing the Council to take as much land out of the Green Belt as they want as Safeguarded Land, stating whatever so-called exceptional circumstances they want, and the public cannot have any say in the matter. The Council can simply ignore site specific comments as they know these will not be subject to examination.

2.4 I took this up with the Programme Officer and am concerned at the inconsistent and somewhat misleading response received.

2.5 In an e-mail of 30th July, the response specifically stated that once the plan is adopted, the sites allocated as Safeguarded Land "will still be in the Green Belt" and a future plan will examine potentially taking safeguarding land out of the Green Belt. Again in a subsequent e-mail of 1st August, it was stated that for safeguarded land to be "potentially taken out of the Green Belt", allocated for development and subsequently developed, then a new plan would have to be drawn up that includes these proposals. Exceptional circumstances will have to be provided and much like this plan, it will have to be consulted on and examined. However, whilst in these two e-mails reference was made to safeguarded land being still in the Green and only "potentially" being taken out, it was then stated "whilst the sites are released from the Green Belt as part of this plan" - a direct conflict with the previous comments.

2.6 It is clearly stated in the Council documents, that all allocated safeguarded land is specifically being released from the Green Belt within the "current plan" which is the subject of examination. It is not still within the Green Belt, nor is it currently land between the urban area and Green Belt. The fact that there are no current allocations of specific development on this safeguarded land (however, see below reference to the contrary for proposed safeguarded land in Shifnal) is irrelevant to the fact that it is "within this plan" that it is being released from the Green Belt.

2.7 Therefore, it has to be within the examination of the current plan that the exceptional circumstances being put forward by the Council to justify such release of Green Belt have to be tested for soundness. In the e-mail response of 1st August, it was stated that such removal of safeguarded land from the Green Belt in the future will be subject to examination “ as here”.

2.8 The responses also stated that “I appreciate that your interest is in the Shifnal area but please may I draw you attention to Policy S1.1 point 8, which says: *Safeguarded land is not allocated for development at the present time, rather it has been safeguarded for Albrighton’s future development needs beyond the current Local Plan period.*”

2.9 However, as I pointed out in my previous representations, whilst the Council have not referred to future development proposals for other safeguarded land allocations, as quoted for Albrighton above, this is not the case with Shifnal. The Council specifically give a detailed description of what they are proposing for its future development – referring to it providing a “strategic housing extension”/“a new neighbourhood community” and giving details of highway improvements, infrastructure, types of housing etc. The Council have clearly set out, therefore, and committed to if the Plan is approved, what the future development of the safeguarded land will be. Therefore, it is incorrect to say that there will be an opportunity in a future plan for such development to be consulted on and examined. All that the public will be able to comment on are the specific details of development, not the principle behind the release of Green Belt, as this will have been approved under the context of the current Plan.

2.10 It is also noteworthy, that the Council specifically stated during the Plan process, that there was a likelihood that the development it was proposing for this safeguarded land may have to come forward before the end of the current local plan period. Again this undermines the comment that there will be an opportunity to examine the release of this safeguarded land at a future local plan review.

2.11 Advice states that Councils have to show exceptional circumstances to release Green Belt now, not at a subsequent local plan review. It is also incorrect to say that land removed from the Green Belt cannot be developed until allocated. A number of planning applications and appeals have been determined in favour of development where safeguarded land has not been allocated for specific development.

2.12 I note that under Matter 2, one of the questions relates to the release of Green Belt to safeguarded land and the exceptional circumstances for doing this. This is inconsistent with comments in the e-mail responses that the release of Green belt to safeguarded land “cannot be examined because such land is not allocated for development”. Safeguarded land under Matter 2 is not being allocated for development but its release from Green Belt and exceptional circumstances are still being allowed to be considered under Matter 2.

2.13 The Council has submitted further Green Belt papers since the Reg19 consultation and Stage 1 hearings, so the public should have the right to challenge and be heard by the Inspectors on site specific release of Green Belt for Safeguarding Land.

2.14 It is difficult in respect of Q4, therefore, to know how to comment, as matters relating to release of Green Belt and Safeguarding Land are site specific. The local community in Shifnal has raised concerns about the extent of Green Belt removal to provide the allocated employment site, which is now proposed to be mainly used to meet Black Country needs. As these concerns relate to a particular site allocation, but also to the question raised under Matter 2, it is unclear whether representations made on this issue are to be considered here or under Matter 26.

2.15 Objections have been made against the size and location of the employment site allocated, which was originally solely proposed to meet the needs of Shifnal. The Council now proposes that the majority of the site will be used to meet all 30ha of the Black Country employment figure. As I have pointed out in my consultation reply, it is unsustainable to have the Black Country housing at settlements a considerable distance away from the complementary employment site. The employment should be allocated with the housing to ensure that sustainable Black Country allocated development. Thus there is no justification to release 30ha of Green Belt at Shifnal to meet all the Black Country employment. Also, in view of the Council's previous assertion that all 39ha of the site was solely required to meet Shifnal's needs, then by taking out 30ha to now meet Black Country requirements, the Council will now have to allocate a further 30ha of Green Belt for release to replace the loss of Shifnal employment land.

2.16 On sustainability grounds, there is no justification to release 30ha of Green Belt to meet Black Country employment, nor to have a consequential effect of leading to yet further release of Green Belt to cover the shortage of claimed employment need for Shifnal resulting from such allocation.

2.17 It is not considered that alternative sites for the provision of Black Country employment on sites with the proposed housing allocations to provide sustainable Black Country provision, have been properly appraised and that the exceptional circumstances put forward for the release of Green Belt at Shifnal for Black Country employment are unsound and unsupported by sustainable development objectives.

2.18 I note that the Council have been required to provide updated gypsy provision data, it being considered that the original data upon which Plan policies are based is outdated to be used as evidence to support policy. I would argue that the same applies to considering the basis upon which Black Country needs for housing and employment have been based. The Black Country unmet needs figures were based on an authority which no longer exists and a proposed Black Country Plan that again is no longer being prepared. Now that the Black Country Authority has been disbanded and the individual Councils now going their own way with their own plans, the evidence upon which unmet needs was based, can no longer be considered reliable or subject to examination as the Authority providing the information is defunct. As the information is outdated, unmet needs data should now be updated in consultation with the individual Black Country Authorities to provide updated

housing and employment data linked to the evidence now being produced by these authorities own plan preparations and evidence base. In view of the impact of meeting such needs will have on the Shropshire Plan, then it would seem as, if not more, important to require updated Black Country unmet needs data as is being required for Gypsy provision.