

Shropshire Council Local Plan Examination

Matters, Issues and Questions (MIQs)

Representor name: Bruton Knowles on behalf of Shifnal Matters, Shifnal town council and Tong Parish Council

Name of participant: Richard Brogden on behalf of Bruton Knowles

Email address Richard.brogden@brutonknowles.co.uk

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 21 - Shifnal Place Plan Area (policy S15) – see MMs 105-109

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites SHF013 – Land adjoining Meadow Drive, Shifnal

SHF015 & SHF029 – Land adjoining Beech House between A464 and Park Lane, Shifnal

SHF022 & SHF023 – Land between Windmill View and The Monument on A464, Shifnal

BK Response:

No Omission sites are to considered at this Hearing session.

I refer to our original submissions and attach my response to the Updated Green Belt Topic Paper 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 either the allocated site nor 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, after the Stage 1 Hearing.

Additionally the P O 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.

Additionally I reiterate that with no substantive Infrastructure improvements allowed for the potential Allocation will result in unviable sites and the inevitable loss of affordable housing and thus a failure to meet the affordable housing policies