

PLANNING COMMITTEE'S RECOMMENDED RESPONSE ON SHROPSHIRE COUNCIL'S DRAFT PRE SUBMISSION PLAN CONSULTATION

A. Policy SP2 – Disagree

A1. Shropshire Housing Total

1.1 The Town Council opposes the high housing growth figure proposed and the proposed addition of 1500 houses to meet Black Country needs. Settlements are already having difficulty in ensuring that infrastructure is being developed at a level and timescale to support permitted and completed development. This is contrary to several of Shropshire Council's Strategic Objectives requiring sustainable development and communities. There should be a pre-requisite for settlements to be able to develop their infrastructure to meet existing needs before further growth is permitted. A moderate level of growth is more likely to meet this objective and ensure that communities can develop in a sustainable way in the future.

1.2 The long term effects of Covid are uncertain and the local plan will be reviewed long before 2038. It is considered that to reduce unnecessary pressure on greenfield and green belt and ensure infrastructure can keep up with growth to meet sustainable communities strategic objectives, a cautious approach should be taken on this review and a moderate growth figure adopted.

1.3 Shropshire Council have failed to demonstrate how the increased provision of housing above need, will lead to more affordable housing or how employment will actually be developed to meet the housing growth. Past employment take-up in the County, together with the impact of Covid on the economic sector suggest that Shropshire are being overly optimistic in expecting employment and infrastructure to be developed at the same rate as housing to ensure sustainable development.

1.4 By proposing a significantly higher housing figure than that required to meet the stated need for Shropshire, this will place considerable strain on the County's ability to meet national 5 year land supply and housing delivery targets, leading to pressure for the future release of unallocated land. Shifnal has already experienced this problem by having unplanned permissions granted for a 40% increase in the town solely to meet a failure by Shropshire Council to meet these national requirements. This has led to safeguarded land being removed from the Green Belt solely to meet future local plan requirements and being developed for unplanned housing, requiring even more Green Belt land to be removed for future requirements. Proposing such a high housing growth figure would be likely to lead to a similar scenario in the future.

1.5 The addition of 1500 houses to meet a migrant need from the Black Country would further exacerbate this problem. National Planning Policy Framework states that to be sound, any unmet need from neighbouring areas should only be accommodated where it is practical to do so and is consistent with achieving sustainable development. Shropshire Council have simply stated that they are accepting an additional 1500 houses on top of an already excessive housing figure above need. They have not provided any evidence to justify how this figure was arrived at, nor how it assessed whether such housing could be accommodated to meet its sustainable communities objectives. By failing to give any details on how

and where this housing will be accommodated, Shropshire Council have failed to demonstrate that it is practical for the County to absorb such a large increase and that the housing can be provided whilst still achieving sustainable development and protection of Green Belt.

1.6 The Town Council are not aware that a detailed analysis has been carried out by the Black Country to fully assess the availability of land within the Black Country to meet its own needs. This is especially so in view of recent Government announcements stressing the need to fully utilise brownfield sites in urban locations and to protect Green Belt. Indeed, the Government has also recently provided significant financial help to the West Midlands for this purpose.

1.7 The Green Belt Exceptional Circumstances Statement specifically states that Shifnal will play a key role in meeting this need. This is contrary to Green Belt policy as it will require the removal of Green Belt not to meet essential Shifnal needs and when no alternative locations have been considered. Shropshire Council have stated that Shifnal has infrastructure deficiencies to meet already approved housing and is a commuter town. It also recognises the desire of residents in the town for it to retain its village character. The addition of unmet migrant need from the Black Country would constitute unsustainable development and an unsustainable community, so failing to meet the positively prepared soundness test.

1.8 Telford is the largest settlement in east Shropshire fulfilling the strategic role in this area. It is not in the Green Belt and its population is well below that planned for it when it was designated as a New Town. If it can be proved that there is a need for this Black Country housing to be met to the west of the West Midlands, then Telford would be a far better planning location than a small settlement like Shifnal and the consequential loss of Green Belt.

A2. Shropshire Employment Total

2.1 The Town Council are concerned at the wide variations in employment figure proposed for the County between different documents or parts of the Plan. As the amount of employment land required and allocated affects the amount of greenfield and particularly Green Belt that will be required to be released, setting an accurate and consistent figure is essential.

2.2 The Plan states that around 300ha is proposed, but says this is around 15ha a year. However, 15ha/year over the 22 year period of the Plan equates to a total of 330ha. Totalling the individual Place Plan Area totals of employment land proposed then gives a total of 376ha, whilst Appendix 6 states that the strategic employment land supply will be 414ha. There is thus nearly a 40% difference in employment land proposed within the Plan. Indeed, para 3.20 also states that Appendix 6 “provides information on the employment completions achieved since the start of the Local Plan period and the various commitments (including allocations) available, which will contribute towards achieving the identified employment land requirement”. No reasoning is given as to how if Appendix 6 contributes to the employment land requirement and totals 414ha, the employment land figure in the Plan is stated at 300ha.

2.3 A further discrepancy is that the employment land supply figures fail to take into account employment proposed in the Plan for RAF Cosford (Aviation Academy, 1500 additional military personnel; new air ambulance development). This additional area means that the actual employment land figure proposed is well over 50% more than the 300ha figure quoted.

2.4 No explanation is given for these wide variations. Allocation of employment land to settlements and justification of release of Green Belt land cannot be justifiably carried out when there is such a divergence of total employment land required to be met.

2.5 The Town Council are also concerned that the basis for employment land and economic policies is stated to be the Council's Economic Growth Strategy 2017-21. This Strategy will be out of date before the Plan is adopted and fails to consider the long term economic situation up to 2038. It is considered unjustifiable to rely on such a short term Strategy for all employment related matters on a Plan that will run for 17 years after the end of the Strategy.

2.6 There is also concern that there is no recognition in the Plan of the huge impact that Covid-19 is and will be having on the national and local economy. This is likely to significantly affect the economic aspirations and implementation of economic proposals in the Plan, suggesting that a much more realistic and conservative estimate of employment land requirements should be undertaken, with a view to the next Plan Review reassessing the economic situation when the full effects of Covid-19 can be assessed. Otherwise, there is a high likelihood that employment will not keep up with the high housing figure proposed and so balanced growth will not occur nor will sustainable development be achieved, conflicting with Policy SP4 in the Plan. Or that if allocated employment land is not developed, it would come under pressure to be re-used for housing adversely affecting sustainability objectives.

2.7 There also appears to be an inconsistency in comments made by Shropshire Council in a meeting with the Town Council, on the relation between housing and employment figures and the objective of balanced growth. Although not clarified in the Plan, Shropshire Council said that the 1500 houses from the Black Country unmet need were incorporated into the Shropshire housing figure, not added on as extra housing. The increase in housing in this plan to 30800 from the previously proposed 28750 was stated to be due to the increase in Plan period from 2036 to 2038. It was also said that the employment land supply figure for the County was related to the housing figure to achieve balanced growth based on a formulaic model. However, the employment land figure is the same in this Plan as on the previous consultation. Whilst Shropshire Council say the new housing figure is solely related to the extra 2 year period of the Plan, they have not similarly amended the employment figure for the extra time period and amended housing. This questions, therefore, the justification put forward for the employment land supply total.

B. Policy S15 – Shifnal – Disagree

B1. Shifnal Housing

1.1 The Town Council reiterates its comments on the Preferred Site consultation, that the amount of windfall housing proposed is unsustainable: the proposed windfall

allowance would still constitute nearly 30% of the total additional housing proposed. There is limited scope for such housing within the development boundary which would then place great pressure to allow significant exception housing on Safeguarded Land and Green Belt areas, contrary to national and Neighbourhood Plan policies. As stated previously, there should be less uncertainty as to the means of providing the required housing guideline figures and to where such housing should be located. The local community should be given more certainty as to how additional housing requirements proposed for the town will be met.

1.2 National Planning Policy Framework para 70 states “where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”. Shropshire have provided no evidence under any of these categories to justify its windfall allowance for the town, contrary to national policy.

1.3 Because of the impact of allocated housing sites on the release of Safeguarded Land and Green Belt land to meet proposed and future housing, it is essential that the amount of housing that such sites will provide is based on unambiguous figures relating to area and density. National policy requires exceptional circumstances for the release of Green Belt land and full consideration to alternative sites. This is not possible if there is uncertainty and discrepancy in such figures. The Town Council are concerned, therefore, that there is considerable disparity on the size of allocated housing sites and housing densities proposed between various documents upon which the Plan is based.

1.4 Unfortunately, the Plan does not provide information on the size of the three allocated housing sites (and hence the densities required), although this information was shown on the Preferred Sites consultation. No reason was given for this essential information not being included in the consultation Plan. Information had to be subsequently obtained from a Planning Officer and the figures quoted below for the Plan, are those provided by the Officer. However, this information has not been made publicly available by Shropshire Council.

1.5 Housing Site SHF022/pt023. Stated to be 5.3ha at a density of 18.8dwg/ha on the Draft Pre-Submission Plan (DSP). But on the Preferred Site (PS) consultation, this was said to be 3.5ha at a density of 28.57dwg/ha. The Planning Officer said that the difference was related to gross not net area, but there was no explanation of this in the Plan or indeed the PS consultation. The latter clearly showed the same allocated site and there was nothing in the PS plan to state that this was a net area only. The public are entitled to see all relevant evidence detailed in the consultation. The Green Infrastructure Strategy for Shifnal gives the site area as 4ha.

1.6 Housing Site SHF013. Stated to be 2.6ha at a density of 24.7dwg/ha. However, the site area on the Strategic Land Availability Assessment (SLAA) is given as 3.87 ha. The density of housing on allocated sites on PS for Shifnal was 28.57dwg/ha. No reason has been given why a different density is now proposed for this site. At the PS proposed density, this would give a total housing provision for the site as 74

on the Officer's stated 2.6ha and 111 based on the SLAA area stated for the site being made available (compared to 65 stated).

1.7 Housing Site SHF015/029. Stated to be 3.3ha at a density of 19.8dwg/ha. These sites are shown on SLAA with a site area available of 3.84ha. (the Green Infrastructure Strategy says 4ha). Again no reason is given why the proposed density is different to that proposed on the PS. At the previous PS proposed density, the site would provide 94 houses on the Officer's stated 3.3ha and 110 houses on the SLAA area stated for the sites being made available (compared to 65 stated).

1.8 Based on PS densities and SLAA site areas (even if accepting the net area of site 022/023) the three sites would provide 321 houses. To meet the required additional housing need of 322 houses, therefore, and assuming a smaller windfall allowance), less land would need to be allocated for housing and hence less land removed from Safeguarded Land/Green Belt.

1.9 Shropshire Council have not explained why the densities proposed are different to those proposed on the PS consultation, nor indeed how they came up with the proposed densities. Government policy seeks to maximise use of land by increasing densities on land and 30 dwg/ha is an often used average. At such a figure, the three sites could provide 336 houses, ie in excess of the required housing.

1.10 In its comments on the Preferred Scale and Distribution consultation, the Town Council commented that the town needs to assimilate the current high housing growth and for infrastructure development to catch up. It requested any additional housing should be specifically phased for the post 2026 period. The Town Council are concerned that no such phasing is proposed, and indeed the proposed delivery timetable is for housing before then. SP6 of the Plan para 3.44 states that to ensure there are no unnecessary barriers to development, the Local Plan only seeks to apply phasing to site allocations where this is linked to a specific infrastructure constraint. Both the Shifnal section of the Preferred Scale and Distribution consultation and the Place Plan (included as part of the evidence base for the Plan), refer to infrastructure constraints in the town. Shropshire Council have not proposed any phasing of the allocated sites, yet have given no reason why their own statement in policy SP6 does not apply here and why the evidence in the earlier consultation, Place Plan and the Town Council's comments, were not considered sufficient to justify phasing in accord with policy SP6.

B2. Shifnal Employment

2.1 There is inconsistency and discrepancies in the stated land required and allocated site area. As Green Belt land is proposed to be removed for such allocation, it is essential that it is made clear the precise amount of land required so that the minimum amount of Green Belt is lost.

2.2 The Plan says that some 41ha of land is required, comprising 2ha of existing allocated land and 39ha on one proposed site. However, Appendix 6 says that the strategic employment land supply for Shifnal is 43.4ha with 2.6ha completed and committed. Thus on this basis, on the Plan's stated requirement of 41ha, with 2ha already allocated and 2.6ha completed/committed, there would only be a need for a new allocation of 36.4ha and not 39ha as proposed.

2.3 The Preferred Site (PS) consultation para 3.2 stated that the proposed employment guideline figure was 40ha requiring a new provision of 38ha. No justification has been given for the additional 1ha now proposed. (There was also an inconsistency on the PS consultation, as although the above paragraph stated that the guideline was for 38ha additional land, the site proposed was stated as being 40ha. No explanation was given for this discrepancy.)

2.4 On the figures stated on the PS and current Plan, there is, therefore, a wide variation of between 40ha and 43.4ha as the employment land guideline figure for Shifnal, and a variation of between 36.4ha and 40ha on the additional land required. There is yet a further variation, as the Employment Land Review 2019 (which is quoted as one of the evidence documents used to prepare the Plan), states in Table 10.1 that 38ha is to be allocated.

2.5 Similarly, there is a variation in the stated size of the allocated site. The PS consultation said the site was 40ha (15ha net), whereas the current Plan says the site is 39ha (net 15.6ha). Thus the Draft Pre Submission Plan (DPS) is stating a higher net figure on a smaller site area. However, para 5.212 of DSP states that the additional land is 40ha (net 16ha) ie. 1ha more of net development than the 40ha stated on PS. Shropshire Council's Invest in Shropshire Brochure publicising investment opportunity sites in the County, includes the proposed allocated site as being 38ha. No clarification or justification is given for these variations. This is a significant discrepancy when seeking to minimise loss of Green Belt in accordance with national policy.

2.6 The Town Council reiterates its previous objections to the proposed guideline figure (taking 41ha for the time being). On the Preferred Scale and Distribution consultation, the proposed employment land guideline figure was 16ha (2ha existing allocation, 14ha new). It stated that "therefore, a minimum of 14ha of additional employment land will need to be identified to achieve the preferred level of employment development in the town". At a meeting between the Council and Town Council in March 2018, the Council stated that the proposed allocation was 14ha of additional employment land. In an e-mail from a planning policy officer in July 2018, it was stated that "we have identified for...employment land... will require approximately....provision for 14ha of additional employment land".

2.7 The Town Council was, therefore, continually advised that a total of 16ha (14ha additional) was proposed, but then changed this to 40ha on the PS consultation, which has now increased again to 41ha. This is a significant increase and loss of Green Belt for which the Town Council do not consider that there is any reason that can be supported by the evidence.

2.8 Shropshire Council say there are local circumstances for this sudden change from 16ha to 40/41ha. These are stated as firstly being that employment development in Shropshire is developed at 40% of total land area such that 40ha will deliver 16ha of built development. However, as the Council state, this is a Shropshire, not Shifnal specific percentage, yet the Council are only applying it to Shifnal – no explanation is given for this inconsistency in application. Of more importance, however, is that the 40% has already been applied to the total

employment guideline figure proposed for Shropshire in policy SP2. This is made clear in the Preferred Scale and Distribution consultation document (Appendix 2 A2.13 and A2.19). The Council are, therefore, double counting the 40% calculation adjustment.

2.9 Secondly, Shropshire Council say that commercial buildings are developed as single storey buildings for Class B use. However, the type of employment uses proposed are similar to other allocated sites in the County. Indeed, policy SP11 specifically states that 80% of employment in Shropshire is expected to be Class B use, so again, this is not a local circumstance specific to Shifnal, but a factor already built in to the overall employment figure for the County.

2.10 So there are in fact no local circumstances to justify the increase from 16ha to 41ha, as the 16ha originally proposed and announced to the Town Council, already included these adjustments which were applied to the whole County. There is, therefore, no exceptional circumstance to justify the removal of an additional 25ha of land from the Green Belt.

2.11 At a recent meeting, Shropshire Council stated that they have used a consistent methodology across the County. However, this is not the case here as Shropshire have not used this double counting methodology on other employment land allocations in the County

2.12 Shropshire Council refer to the need to balance housing and employment in the town and state a need to deliver a level of employment growth in balance with the “anticipated” level of new housing. Shropshire Council are, therefore proposing 41ha of land for just 322 new housing, as the rest of the 1500 housing guideline figure is already completed/committed so is not “anticipated”. This proportion of employment land to anticipated housing, is far higher than other settlements with no explanation to explain the difference. It also contradicts previous decisions of Shropshire Council when the majority of the 1500 houses were approved, thus questioning the reasoning behind the current allocation and why achieving such a claimed balance and sustainable development was not considered necessary by Shropshire Council in their recent decisions.

2.13 On the most recent application for residential development for 100 houses in 2016 (approved as an exception to policy), the applicants submitted an employment land assessment which concluded that a maximum of 2ha employment land for Shifnal could only be justified up to 2026. This was on the basis that an additional over 1000 houses had already been approved for the town as exceptions to policies (some 40% increase in the size of the town). Shropshire Council accepted this assessment as credible and approved the development (which also included the loss of employment allocated land). It is noteworthy that the other 1000 houses had also been approved without requiring any balancing employment land to be provided, and indeed one of these developments also included the development on existing employment land. When challenged at a recent public meeting why Shropshire had accepted a maximum of 2ha of employment allocated land as being the need for an additional 1100 houses, yet was now saying 41ha was required for just 322 houses, the Council simply stated that the previous figure was “wrong”. No reason was given why it was wrong when it was produced by consultants and had

been accepted by the Council. If the Council are saying that their previous decision was wrong (together presumably with their decisions to grant the other 1000 houses without additional employment land), then the local community are justified in questioning whether the current proposals by the Council are similarly wrong, especially as these are not backed by a reasoned analysis by consultants as previously.

2.14 Shropshire Council say that their concern is to secure a better balance between the committed scale of housing and an assumed deficit in employment land. This scale of housing was already proposed when the Council accepted the loss of existing and allocated employment land in granting residential developments, and fully accepted in 2016 the consultants conclusions that only 2ha employment land provision was required. No compelling evidence has been submitted to justify what has changed since then to firstly propose a requirement of 16ha, and now 41ha, and why it did not feel that Shifnal had a deficit then, but only a couple of years later and with no significant additional housing development planned, it does have a deficit now.

2.15 As the Town Council previously pointed out, as most of the recently approved exception housing has now been built and occupied before this additional employment land will be developed, then these residents will already have employment. It is most unlikely, therefore, that the significant land release now proposed will meet the needs of existing residents and so affect the claimed balance deficit. By allowing such a disproportionate amount of employment land, it is more likely that this will lead to increased commuting into these employment areas from outside the town and result in great pressure from developers to provide more housing, with potential adverse impacts on protection of Safeguarded Land and Green Belt.

2.16 Shropshire Council commented on the recent residential permission, that should a specific employment investment arise in the future that required additional land, then this could be considered on its own merits as an exception to policy. As the Town Council previously commented, if a specific employment investment arose in the future that would clearly support the specific needs of the town and require additional land, then this could be considered on its own merits as an exception to policy. This would avoid the problems stated above with the current guideline figure proposed and would ensure that only sustainable development to meet the needs of the town was approved. Shropshire Council has again given no reason why their previous view is no longer considered appropriate to justify releasing such a large amount of Green Belt land.

2.17 The Town Council reiterate its strong objection to the proposed 41ha of employment land for the reasons above, and based on past trends and the current adverse effects on the economy from Covid-19, still considers that the original proposal of 16ha is excessive and not a realistically achievable figure. The Town Council previously suggested a figure of around 8ha (6ha additional) as a more realistic and, more importantly in Green Belt terms, achievable figure to meet the needs of the town. This would also accord with the concerns expressed by the public in the Neighbourhood Plan to keep changes to the Green Belt to the minimum required to solely meet the needs of the town. It would also minimise the likelihood

of employment allocated land not being used for employment purposes and then being approved for residential development as the town has only recently experienced. In view of the fact that the Local Plan will be subject to further review before the expiry date of 2038, it is considered that to protect Green Belt land from unnecessary loss, a cautious approach should be taken with employment land supply, which can then be reviewed when the effects of Covid-19 can be better assessed and actual take-up of such land assessed.

2.18 In allocating such a large area of land, Shropshire Council have not taken into account the likelihood of attracting employment when there is such a high provision of alternative employment land already provided or committed in adjacent areas that fall within the M54 Strategic Corridor. I54 adjacent to junction 2 of the M54 has 24ha available on Phase 2 (which could accommodate over 1msq.ft. of buildings) plus land available still under Phase 1. At Featherstone near Junction 2, a 24ha site will be able to develop some 850000sq.ft. The West Midlands Interchange is a major strategic site recently granted planning permission, with good access to the motorway network. It is stated that it could provide some 8500 jobs and 8m sq.ft. of buildings. This would be in addition to the proposed on site rail terminal which will be a major attraction to inward investment. This site is also close to a new development at Four Ashes where a 450000 sq.ft. building is available. At Sutton Coldfield, some 2..62m sq.ft. of buildings are being promoted. In Telford, a 10ha site at Newport is being developed and a 21ha site at Hortonwood. It is estimated that there is some 162ha of available employment land in Telford , plus a number of industrial units. There are also a number of large industrial buildings available in the West Midlands (eg Cannock, Wolverhampton, Willenhall, Hilton Cross), and a large business park at Stafford close to Junction 14 of the M6. Further, there will be competition from sites with a close connection to the proposed HS2 that are likely to be more attractive to strategic employment than Shifnal: it is noted for instance that a 140ha site next to a HS2 interchange is being promoted at Solihull which will provide 25000 jobs and 6m sq.ft of employment plus housing.

2.19 National planning policy and guidance requires proper consideration be given to alternatives and reasons given why these are not considered appropriate, before removing Green Belt and establishing that exceptional circumstances apply. The Plan in allocating such a large area of employment land in Shifnal in the Green Belt has provided no evidence to show that it has taken into account the amount of already available employment land and buildings in the immediate locality, why it does not consider these alternatives will meet any need in the area, or what evidence it has to substantiate its comments that there are a number of interested businesses that would locate to Shifnal, despite the costs of first developing the site and the requisite infrastructure, especially off-site highway improvements. It is considered, therefore, that the allocation of this amount of land in Shifnal by removing it from the Green Belt is contrary to national planning policy.

2.20 The Plan refers to Shifnal being a key location providing links to the M54 corridor and to provide suppliers to Bridgnorth employment sites. No evidence has been submitted to substantiate this claim. The reality is that suppliers to Bridgnorth will locate to Bridgnorth (where significant new employment land is also proposed) not Shifnal. Similarly, suppliers to manufacturers based in Telford will locate to Telford where there are established industrial estates and vacant land with better

access that does not need a large investment in highway improvements. Companies will not want access along a country lane.

2.21 The M54 has no access north onto the M6, and those travelling south on the M6 cannot access direct the M54. This will be a significant constraint for Shifnal to attract occupiers in competition with Telford and the West Midlands. (the Jaguar engine plant on I54 was only located there because of the grants available and that it was servicing the plant at Castle Bromwich south of M54).

2.22 Shropshire Council say that planned provision of new land for employment opportunities in the past has been limited. This is an incorrect statement. For a substantial period at least 12ha of land was allocated for employment land adjacent to the existing industrial estate (this is hardly a “limited” amount as it is similar to the 14ha proposed in the Preferred Scale and Distribution consultation). There was no take up for this land which eventually was taken up by an educational establishment. The Town Council consider that the past take-up of employment land in the town is a truer reflection of employment need in the town than the arguments now being put forward to try to justify such a large increase in allocated land.

2.23 In a meeting with Shropshire Council in March 2018, the Town Council were told that a number of proposals for deliverable employment land in the town had been received and that they would provide this evidence. At a subsequent meeting in August 2018, the Shropshire Council again advised that there was significant demand for economic development. No such evidence has been made available to support this claimed need. Indeed the proposed site was advertised in the Council’s investment opportunities brochure, but in response to a question, they stated in October 2019 that no formal approaches or expressions of interest to invest had been received.

2.24 The Town Council also note comments made in the Strategic Sites & Employment Areas Assessment which is part of the stated evidence base. This assessed an employment land requirement 2013-2026 of only 5ha (with 4ha allocated this meant an addition of only 1ha). It stated that there were no employment issues for the Shifnal Place Plan area and recommended no new employment land allocation for Shifnal. It also commented that market agents felt there was insufficient demand to justify further development and that the market for industrial premises, and as an employment location, Shifnal was overshadowed by Wolverhampton and Telford. Although specific to the industrial estate, it also stated that stakeholders felt that the present level of market demand does not justify further development of offices and industrial premises. This is even more applicable with Covid-19 impacts. These comments reinforce the Town Council’s views that only a limited amount of employment land, and consequently loss of Green Belt, can be justified as an exceptional circumstance.

2.25 The Town Council are also concerned that although the employment land guideline figure of 41ha is stated to be for the current Plan period up to 2038, comments in the Plan and the Employment Land Review, suggest that much of this guideline figure is proposed for beyond 2038. Appendix 7 of the Plan includes a delivery timetable for the allocated site of beyond 2038. The Employment Land Review also states that the Local Plan Review identifies a preferred employment

land guideline between 2016-36 of some 16ha with a further 24ha providing for the successive plan period to 2056. It then states that the proposed 38ha (compared to 41ha now proposed) could be either allocated in its entirety or partially safeguarded for use in the successive plan period to 2056. Similarly, the Green Belt Exceptional Circumstances Statement para 8.153 states that the allocated site will help boundaries become permanent limits to development beyond 2038.

2.26 These comments again cast doubt on the justification of the allocation of 41ha for the current Plan period and the exceptional circumstances claim for the loss of Green Belt. It appears that most of the land is not required in the current plan period but subsequently, in which case, it would be more appropriate to allocate it as Safeguarded Land for future consideration, rather than allocate now as an employment site for the current Plan period as proposed.. It also further questions Shropshire Council's arguments for increasing the original 16ha to 41ha, as it states that only 16ha is required for the Plan period and the further 24ha (or 25ha now) for the subsequent Plan period.

2.27 This justification for the employment land allocation is further questioned by ambiguity in the reasoning for the employment. The Plan firstly states that the employment is required to meet the anticipated housing growth and housing/employment deficit. The balanced growth calculation for 1500 houses would require 16ha not 41ha. However, the Plan then states that Shifnal is to function as a sustainable investment location for the M54 corridor and to become a growth point within the sub-regional area of the West Midlands. These are conflicting objectives with no details given as to how Shifnal would accommodate such sub regional growth, how much such growth would be likely, where this growth would be located, how the infrastructure of the town would be developed for this growth and how the town would retain its village character and sustainability if it is to meet development not required to meet the needs of the Town. As Green Belt land is proposed to be removed to provide employment land, it is considered essential that there is clarity in the proposals for the town, rather than an ambiguous statement that sometime within the Plan period the town will be expected to meet sub-regional and not Shifnal generated needs. No alternative sites have been considered in the Plan for meeting this additional growth, so by removing a large area of Green Belt at this time for unplanned growth, is contrary to national Green Belt policy.

2.28 The Town Council are also concerned that the proposed Local Economic Growth Strategy for the town has not been progressed and question whether this is related to Shropshire Council's apparent determination to allocate 41ha of employment land despite detailed planning arguments against such a provision and local opposition. In February 2019, Shropshire Council referred to the preparation of these local growth strategies for the main market towns, including Shifnal. They stated that the strategies would create a shared economic vision for each town, working closely with each town council and local stakeholders, and encouraging them to make their thoughts known and "to take ownership of their strategies". The strategies were to act as an evidence base for the local plan and would fully align with the Place Plans for the towns.

2.29 These strategies were, therefore, seen as an important part of the economic basis for the towns in the local plan review, being produced as a close co-operation

between Shropshire Council, the town council and local businesses, so that there was a clear local input into employment land requirements of the local plan. However, whilst all the other market towns have had their strategies progressed and draft proposals consulted upon, Shropshire Council have failed to progress a strategy for Shifnal. At a meeting with Shropshire Council in November 2018, the Town Council agreed to co-operate in a strategy for the town, but Shropshire Council have not taken this any further. It seems coincidental that the failure to progress a strategy for Shifnal from early 2019, occurs at the same time as the Town Council and local residents objected to the sudden increase in allocated land from 16ha to 40/41ha on the Preferred Sites consultation.

2.30 The Town Council reiterates its previous objections to the continued allocation of SHF 18b and 18d as an employment site, and notes that Shropshire Council has failed to respond to the detailed reasons put forward to justify those objections.

2.31 In planning and Green Belt terms, it is illogical and contrary to good planning principles, to allocate land for development whilst leaving undeveloped land between it and the town boundary. Towns should expand out incrementally so that new development clearly visually and functionally relates to the town and does not appear as isolated and detached development. By leaving the land between Stanton Road and Lamledge Lane (SHF018a /P14) undeveloped, this is the unacceptable result. The proposed site would in effect “jump over” this intervening land, which is considered an unacceptable form of planning development. The Town Council considers that this alternative site should be allocated for employment land first.

2.32 Shropshire Council have said that development of land west of Stanton Rd should also address its functional relationship with Shifnal Industrial Estate and Lamledge Lane beyond. However, as the access to the former is onto Lamledge Lane, there can be no such functional relationship. Indeed site SHF018a/P14 has a much greater functional relationship than the proposed site. This again places a question over the reasoning and justification put forward for taking the proposed site out of the Green Belt.

2.33 The Plan states that the site would require significant improvements to the whole of Stanton Road before the employment site is used and that no traffic will go westbound into Shifnal. No evidence has been submitted on what these improvements would be, how much they would cost, how the development would be able to meet this cost, how the Council will ensure that the works will be carried out before the employment use commences, nor how stopping traffic going west will be policed. Recent large scale housing developments have taken place and most of the houses already occupied without required off-site highway improvements yet being implemented. This casts doubt that the highway works stated to be essential here, would be implemented before the site was developed.

2.34 The Green Belt Review assessment includes both the Safeguarded Land and the proposed site west of Upton Lane as one parcel. It states that it is more closely associated with the wider Area of open countryside to the east of Shifnal than the settlement edge to the west; and that releasing the land from the Green Belt would lead to a level of encroachment in to the countryside to the east of Shifnal and a narrowing of the gap between Shifnal and Albrighton and weaken the integrity of

neighbouring Green Belt. Of the two sites, SHF018a/P14 would minimise these adverse effects compared to the proposed site.

2.35 The Town Council are particularly opposed to allocating land to the east of Upton Lane which contradicts Green Belt objectives. The Green Belt Review assessment states in regard to this parcel of land that “there are no readily recognisable boundaries to the east (the Plan specifically states the need to “create” an effective boundary to the north, east and south). This parcel contains no built development and is more closely associated with the wider area of open countryside to the east of Shifnal than the settlement to the west. The land slopes away to the east. Releasing this parcel from the Green Belt would lead to encroachment into the countryside to the east of Shifnal and a slight narrowing of the gap between Shifnal and Albrighton. The release of western section of P13a would lead to a **High** level of harm to the Green Belt.” There is no justification, therefore, to support removing this land from the Green Belt.

2.36 National Planning Policy Framework paragraph 139(f), also states that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent. The Green Belt Review specifically says that this is not the case with the land east of Upton Lane.

2.37 The proposed extension of the proposed site east of Upton Lane would be contrary to national policy and Shropshire Council’s own Green Belt Review assessment of the land. It would constitute an unacceptable encroachment into the countryside, has no recognisable, permanent boundary, and would cause High harm to the Green Belt. It would also be contrary to the Green Belt Review’s comment that Upton Lane forms a clearly defined boundary. There are, therefore, no exceptional circumstances to release this land especially when there are alternative sites causing less harm, such as the Town Council’s preferred site.

2.38 Shropshire Council also says in paragraph 18.29 that the employment allocation is releasing land of Moderate-High harm. This is an incorrect statement. The part of the site east of Upton Lane is assessed in the Green Belt Review as High harm.

2.39 National Planning Policy Framework paragraph 137 states that the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before changing Green Belt boundaries. The Town Council do not consider that Shropshire Council has complied with national policy in this context, as it has not demonstrated why the allocation of SHF018a/P14, or part thereof, is not a more reasonable option for meeting any employment need. This land is in a more sustainable location and has a lower minus sustainability appraisal score. It also has a similar site area to SHF 18b and would meet the original requirement of 14ha of additional land (without the unjustified expansion of a further 24ha).

2.40 The Town Council are concerned that it appears that Shropshire Council have pre-determined the allocation of this site and failed, therefore, to properly and evaluate alternatives or to fully take into account comments received on the allocation. These concerns are supported by the following points.

2.41 Shropshire Council previously said that “the Council recognises the important contribution the landowner and their development partners will make to the future of Shifnal in bringing the land forward for employment development in an expeditious manner”. However, Shropshire Council has not provided any evidence to support this statement, or how the Council would ensure that development does occur expeditiously. It appears that Shropshire Council are giving more weight to the wishes of the landowner to have their land allocated for development and releasing it from tight Green Belt restrictions, than the views of the local community and regard to national planning policies..

2.42 Shropshire Council published an Invest In Shropshire brochure produced early in 2019 and which is still on their website advertising investment opportunities. The brochure describes the site as a medium aspirational site and that the site is a potential employment site subject to the Local Plan Review. It further states that “in response to market demand the authority will consider making these potential new sites available for development”. The alternative land at SHF18a/P14 was stated as being available for employment in the SLAA, yet this land was not similarly advertised as a possible investment opportunity to show that full consideration was given to alternatives in the Green Belt.

2.43 It appears that the proposed increase from 16ha to 41ha in employment land for the town between the Preferred Scale and Distribution consultation and Preferred Site consultation was to accommodate the allocation of this land rather than being justified on the needs of the town. This is supported by the so called local circumstances that suddenly appeared on the Preferred Sites consultation to try to justify the increase in employment land so that this site could be allocated in full.

2.44 A significant part of the site, SHF18d, was allocated at the Preferred Site consultation despite the site not having being assessed in the sustainability appraisal. It is a legal requirement that a local planning authority must carry out a sustainability appraisal of each of the proposals in a plan “during its preparation”. The site was proposed at the Preferred Sites consultation but no appraisal was carried out before proposing the site.

2.45 The alternative land at SHF18a/P14, has a lower deficit sustainability appraisal score than the allocated site. Policy SP3 Climate Change 1a refers to the need to minimise the need to travel and maximise the ability to make trips by sustainable modes of transport; 1d to prioritise the use of active travel through the creation and enhancement of walking and cycling links within and between new developments and from new developments to existing neighbourhoods and community facilities in accordance with Policy DP29; 1e to encourage new development to link to and where possible integrate public transport. Policy SP4 Sustainable Development refers to the presumption in favour of sustainable development. On all these policy requirements, the alternative site is better located to comply as it is closer to the town and adjacent to existing public footpaths, whereas the proposed site has no existing or proposed footpath link to the town. No comparative assessment has been carried out on these policy issues to justify the allocated site.

2.46 This point is reinforced by the November 2018 SLAA. This said that SHF18a offers the potential to safeguard land to support the long term growth of a large scale new employment area to the east of Shifnal. This confirms its suitability to meet the employment needs of the town for the Plan period. It also questions the need to remove SHF18d from the Green Belt which is assessed as having HIGH harm.

2.47 The November 2018 SLAA on the allocated site SHF18b and d stated that whilst employment development is generally considered achievable and viable, to confirm these conclusions, a viability assessment will be undertaken to inform the Local Plan Review. The Town Council are not aware that any such viability assessment accompanied the Preferred Sites consultation when the site was allocated.

2.48 The November 2018 SLAA stated that SHF18a had a fair sustainability rating due to its accessibility to many of Shifnal's facilities, whereas both SHF18b and d were stated as having limited accessibility to these facilities. This supports the comments in paragraph 2.40 above regarding compliance with policies SP3 and SP4 of the Plan.

2.49 It is a legal requirement that an authority preparing a plan must do so "with the objective of contributing to the achievement of sustainable development". The above comments on sustainability appraisals, SLAA comments and compliance with policies in the Plan itself, cast doubt on whether Shropshire Council have met their legal responsibility on the allocation of this site.

B3. Safeguarded Land

3.1 It is noted that the Plan fails to give parcel references to the proposed Safeguarded Land, nor are these individual parcels identified on the proposals Map. It is not possible, therefore, for the public to be able to relate the parcels to other documents accompanying the Plan including the sustainability appraisal (it is also noted that there is no plan with the sustainability appraisal for the public to be able to clearly identify the specific parcel reference numbers to their location).

3.2 As the Town Council has pointed out in its comments on other aspects of the Plan, there appears to be an inconsistency in the size of parcels of land included as proposed Safeguarded Land, which affects the total land proposed to be released from the Green Belt. The land described as land between A464(south) and Park Lane is stated to be 9.6ha. Yet on the Preferred Site consultation, the same parcel of land is said to be 13ha. No explanation is given in the Plan why the site area has suddenly been given a smaller site area and consequently reducing the stated area removed from the Green Belt.

3.3 It is noted that the area of Safeguarded Land is with one exception, the same as that proposed at the Preferred Sites consultation. The reasons given for the inclusion of such a large area of land being removed from the Green Belt (92.8ha) are the same as on the previous consultation. However, despite legal requirements to the contrary, the Plan does not consider the detailed objections raised to the original proposal, how these have been taken into account and the reason for overriding these concerns.

3.4 The Town Council consider that part of sites SHF18a/P14 should be allocated as the employment land to meet the 6 ha of additional employment land proposed by the Town Council, and not as Safeguarded Land. The Town Council, therefore object to the inclusion of the whole of this land as Safeguarded Land. Part of the land should be allocated as employment land as set out above. The remaining part of the land not required at this time to be allocated should remain as Safeguarded Land.

3.5 With respect to the land to the south and west of the town, Shropshire Council say this is required as a future strategic housing extension to create a new neighbourhood community, and put forward a number of points seeking to justify the contribution that this new “community” will make to the town. Shropshire Council refer to a “planned strategy beyond 2038”, to provide for future housing needs beyond 2038 and this is a “strategic extension (including viable) representing a deliverable location for further growth and development”. Throughout the Plan and supporting documents, great emphasis is placed on Shifnal being developed to meet strategic growth, yet saying at the same time that it needs balanced growth to meet the needs of the town.

3.6 It appears to the Town Council, that the principal reason for the substantial release of Green Belt, is not to meet the specific needs of the town, but to meet Shropshire Council’s underlying objective to expand the town to become a strategic centre. The Town Council strongly object to such an objective, which is contrary to its Neighbourhood Plan objectives, to the views of the local community on how they wish their town to develop in the future, and is an unrealistic objective in view of the town’s size and position in relation to Telford and Wolverhampton. It is considered, therefore, that the proposed exceptional circumstances for justifying the release of such a large area of Green Belt, are unrealistic and unjustified, do not stand up to detailed scrutiny, and so do not comply with national policy on Green Belt.

3.7 The Plan particularly refers to the role that Shifnal would play to provide strategic economic development in the M54 strategic corridor. However, as pointed out in paragraph 2.18 above, there is a plentiful supply of already committed employment land in neighbouring authorities in this corridor. With the significant reduction in economic development caused by Covid-19, and likely limited demand for new land in the foreseeable future, it is an unsustainable assumption that Shifnal would attract such strategic employment development to justify the release of such large areas of Green Belt.

3.8 It is especially noted in the Green Belt Exceptional Circumstances Statement that Shropshire Council want to “change the capacity” of the town and for it “to perform the same role as Bridgnorth”. Shifnal is less than half the size of Bridgnorth, is surrounded by Green Belt whereas Bridgnorth only has Green Belt on one side, and is only 2 miles from the major town of Telford that provides all major service and facilities in very close proximity. By reason of its size and much further distance away from Telford and Wolverhampton, Bridgnorth is far more capable of attracting and maintaining strategic services and facilities than Shifnal, which cannot compete with its proximity to Telford, no matter what size Shropshire expects it to expand to. All that would happen is that Shifnal would yet again experience a large increase in housing without any corresponding development of the “strategic” infrastructure claimed by Shropshire Council. Although reference is made to Shifnal providing a strategic function, this role is already being served in the east of Shropshire by Telford. The proposal to designate the former Ironbridge Power Station as a

Strategic Site (which is outside the Green Belt) will enhance the role of Telford as the strategic settlement for the east of the County, and will provide a defined strategic site outside the Green Belt to meet any strategic development requirements in the east of the County, rather than expecting Shifnal to perform such a role. It is unreasonable and contrary to the Government's objective to protect the Green Belt, to expect Shifnal to develop as a competing strategic centre.

3.9 The Town Council, therefore, object to the conflicting objectives being proposed for the long term future of the town. It is clear from the Place Plan, Neighbourhood Plan and views expressed by the community on earlier consultations, that the town do not want to be a strategic location where a large amount of development is allowed, substantially altering the existing character of the town. Shropshire Council have failed to take into account local views and especially the objectives and vision for the future of the town that the local community fully endorsed in the recently approved Neighbourhood Plan.

3.10 Its close proximity to Telford and Wolverhampton mean that it is in an inappropriate location to become a significant strategic town (the whole reason for surrounding it with Green Belt). This proximity also means that it is unrealistic to expect that the town would be developed such as to deliver the range of facilities and services that Shropshire Council claim would follow from such strategic housing expansion.

3.11 Shropshire Council say that the town requires a "progressive and steady rate of growth to permit the infrastructure of the town to be improved in response to the requirements of new development". However, there is no guarantee that this would happen and that the town would not end up with the strategic housing expansion without any such improvements in infrastructure. Indeed, recent experience in the town supports the Town Council's doubt that this would occur. Shropshire Council have recently approved some 1100 new houses in the town (some 40% increase), yet they have not ensured that any infrastructure improvements have been implemented. The recent reality of a large expansion of the town is a more realistic scenario of what would happen if the proposed strategic housing extension proposed for this safeguarded land was accepted.

3.12 The development is described as being a "new neighbourhood community". Shropshire Council acknowledge that the local view of Shifnal is the town retains the character and "feel" of a village and its community wish it to remain so. The scale, location and development proposed, and its description as a "neighbourhood community" would see the proposal as a separate self contained entity and in effect split the town into two. The character and feel of the town would be lost and instead of one town, it could lead to two separate communities and make integration of new residents into the town difficult. It would be contrary to one of the main objectives in the Neighbourhood Plan about retaining the small town character of the town and integrating new development into the fabric of the town.

3.13 Shropshire Council refer, as quoted above, that the land is required for a strategic expansion of the town "(including viable)". The Town Council do not understand what the reference to "including viable" means, as there is no explanation as to the context of viability here and the wording does not make any clear sense in the sentence.

3.14 As on the Preferred Site consultation, Shropshire Council have listed a number of delivery reasons to justify the proposed neighbourhood community extension. These are principally the same as on the previous consultation to which the Town Council responded with objections supported by detailed reasons to each point. The Plan does not address any of the points raised by the Town Council. As stated before, therefore, the Town Council maintains that none of the “exceptional circumstances” points put forward as being the justification for the removal of such a large area from the Green Belt, stand up to scrutiny on planning or technical grounds. They cannot, therefore, be considered to constitute the necessary exceptional circumstances to justify such a large release of land from the Green Belt.

3.15 The Town Council note that the Plan refers to this land as a housing extension in one place but a neighbourhood community in the other. These are not the same types of development and the Town Council are concerned that there is a lack of clarity in defining what is proposed.

3.16 The Plan says that the “housing extension” will provide a new strategic highway between the A464 south and A4169 (although para 5.214 (a) says B4169), will effectively create a by-pass round the town and will enable through traffic to avoid a principal highway junction in the town centre. In support of its objection to this point the following reasons are given:-

- As far as the Town Council is aware, Shropshire Council has not carried out any public survey of the local community to assess the local view on the need for such a strategic link. In view of the significant impact of such a major development proposal, the Town Council would have expected Shropshire Council to have undertaken a full local consultation, with draft plans of proposed routes, before proposing such a highway scheme. The Town Council is not aware that Shropshire Council has proposed such fundamental and major highway schemes elsewhere in the County, without first fully engaging the local community and taking full account of their views. To simply propose such a scheme without such consultation is considered to be unacceptable,
- There was a strong opinion at the Preferred Site consultation public meeting attended by Shropshire Council, against the need for such a strategic route. Comments received by the Town Council from the public since that meeting have supported this view. The Town Council do not accept that there are benefits to the town or that there will be any positive contribution to the town, especially compared to the many disadvantages that will arise from such a proposal.
- The proposal will not create a “by-pass around the town”, as stated in the consultation. It only goes around one quarter of the town, so cannot be considered to be a by-pass around the town as claimed. So its strategic benefits will be very limited. If these strategic links are so important to justify such an exceptional reason for removing a large area from the Green Belt, why is it only being proposed for beyond 2038? If it is considered to be so important to the town, why is it not being done now? This undermines the strategic necessity being put forward.

- In view of the cost of such a strategic highway, there must be considerable doubt that the proposed development would be able to meet such costs. As this is crucial to Shropshire Council's argument for allocating such land, it is considered that detailed costings and development viability analysis should first be carried out and made public, to substantiate that the proposed development can meet the costs of the highway works. The Town Council has considerable doubt that development would meet the full costs of the works, which would result in some costs falling on the public purse which would be unacceptable. It can also only be considered as an exceptional circumstance to justify removal from the Green Belt, if there is detailed evidence to fully support the claim that the development can fully meet the strategic highway costs involved.
- It is noted that the previous proposal included land between the A4169 and A464 north and that this was stated as being required to provide a by-pass. As a significant amount of the likely traffic that would use the route would come from the A464 north (hence the reason why the previous proposal took the route from the A464 north), the traffic will either have to join the highway via Innage Road, or more likely carry straight on along the A464. The new route will only be likely to serve the new extension, and then only for the small proportion of journeys that would be undertaken south to Wolverhampton. Existing residents would be unlikely to use the route and for residents of the proposed housing extension, most of their trips into the town and to Telford, the new route would not act as a bypass, as they would still have to go through the town to access the A464 north. Traffic surveys carried out recently by the local community also showed that there was little through traffic, most of the traffic accessing the town itself, which again shows there is no traffic justification for the so called "by pass" and so no exceptional circumstances on this basis for the loss of Green Belt.
- At the public meeting on the Preferred Sites consultation, Shropshire Council said that development of this land would avoid traffic going into the town. This is incorrect, as traffic would still need to go into town to access services and facilities in the town centre and north and east of the town (including the secondary school and employment areas).
- As the proposed by-pass does not go all the way round the town, the new residents of the neighbourhood community will still have to use the town centre junction for the town centre, Aston St car park, new employment area, Idsall School etc. It will, therefore, exacerbate this problem. In any event, improvements to this junction are already planned to meet the current traffic demands.

3.17 The Plan states the housing extension will provide highway improvements at Five Ways and Innage Road. In support of its objection to this point the following reasons are given:-

- Shropshire Council has already obtained S106 monies from the developers of the recent large housing developments in the town, for improvements to Fiveways, to meet the increased traffic needs of the town. As this is already planned for improvement to meet the large scale growth of the town, Shropshire Council have failed to explain what further improvements are

needed to meet these needs and why this housing was approved if the improvement works already programmed are not now considered sufficient. As improvements to Fiveways are, therefore, already planned and to be implemented shortly to ensure that S106 obligations are complied with, this is no justification to support the need for a new community.

- The problem with Innage Rd is purely on-street parking. This can easily be dealt with by stopping such parking and making alternative parking proposals for residents. Indeed, such a proposal was recently identified and indeed put into a planned programme by Shropshire Council but not implemented for what appears to be political not planning reasons. As there is a readily implementable solution available and previously promoted by Shropshire Council, again, there is not the compelling justification required to support the removal of Green Belt as proposed. Indeed, by now proposing that the housing extension would have to use Innage Road to access the town and Telford as the northern entrance/exit to the proposed by-pass, the proposal would exacerbate the situation in Innage Road (which is narrow, cannot be widened and has a narrow railway viaduct which restricts traffic movement along the road) rather than deliver an improvement as claimed.

3.18 The Plan states the housing extension will provide a significant range and choice of housing to meet local needs. In support of its objection to this point the following reason is given:-

- Shropshire Council cannot know what the housing needs of the town will be beyond 2038. Until an assessment of needs is undertaken as and when a local plan is reviewed, it is presumptuous to make such a statement now. Shropshire Council cannot know or make a reasonable assessment of a town's future housing needs so far in advance. It is unreasonable to use such an unknown factor to justify release of Green Belt land.

3.19 The Plan states the housing extension will provide a future opportunity to connect the A4169 and A464 through the railway embankment, creating a safety valve for Fiveways. In support of its objection to this point the following reason is given:-

- There is no technical evidence to substantiate that the railway arch between parcels P17a and SHF017north can physically take the full volume and type of traffic envisaged by a strategic highway, nor that Network Rail will give authority for such use under their land. Evidence was provided to the Preferred Sites consultation showing that the arch was not of adequate size to take commercial vehicles and so only cars would be able to use this route. Shropshire Council have not challenged this evidence. This undermines the reasoning behind the proposal, as either the arch would need significant change (almost certainly prohibitively expensive) or commercial vehicles would still have to use the existing road network, making a one-way system unworkable. As this land is not proposed to be removed from the Green Belt, it undermines the comments about the long term benefits of this proposal, as justification for its removal would need to be established at that time. Also, as the proposed housing extension would have been completed by then, it would be unviable for either a future developer, or indeed Shropshire Council, to

construct this link. It is, therefore, unacceptable to try to use this factor as a reason to justify the current release of land from the Green Belt.

3.20 The Plan states the housing extension will provide increased access to community facilities and commercial services and potential to offer further services.. In support of its objection to this point the following reasons are given:-

- As the majority of community facilities and commercial services are to the north and east of the site, there can be no improvement in access. With the scale of development proposed, there will be a considerable increase in traffic to those facilities and services making access far worse. New residents from the site going to the town centre shops, library, recreational and leisure facilities (e.g. public houses and social facilities) will still have to use the existing network, as no highway improvements are proposed to be provided to these sites.
- Similarly, the main employment land is to the east of the town. The proposed by-pass does not go beyond the A464 south, so to access these areas will require traffic passing through the town centre or using an unimproved Upton Lane .Neither of these can be considered as improving access.
- The future services said to be improved include schools, GP surgery and other health care. The Town has recently had major housing extensions expanding the town by some 40% (similar extension to that proposed now), yet the health services have not been improved to meet the increased demand, and the schools are struggling to expand to meet the increase in pupil numbers and are at or nearly at capacity through site constraints and access for further improvement. There is no guarantee or planning controls to ensure that such improvements would be delivered as claimed. Recent evidence of the reality of such housing development is considered to be a more reliable indication of likely future development .
- Similar arguments apply to the comment about retail and vehicle services. Its close proximity to Telford means that it is very unlikely that even an expansion of the town as proposed, would be sufficient to offer a competitive position for the type of retailers implied in the Plan to set up in the town as an alternative to Telford. To use this as a factor to justify removal of such a large area of Green Belt, Shropshire Council should submit a commercial viability report to establish that the proposed housing extension would support the development of these additional retail and vehicle services in competition with Telford and the Junction 4 petrol station.

3.21 The Plan states the housing extension will provide a significant gain in Green Infrastructure and management of flooding. In support of its objection to this point the following reasons are given:-

- The Green Belt Assessment confirms that this land is closely associated with the wider countryside and development would encroach into the countryside and weaken its contribution to the Green Belt and the critical gap between Shifnal and Telford. The land, therefore, is already an important contribution to the green infrastructure of the town. The proposed green infrastructure as part of a housing development on this land would not improve but harm the existing green infrastructure contribution of the land to the town.

- Improvements to flooding in the town are already part of a joint programme of action with the relevant agencies in the town. The site is at present countryside. The additional substantial development proposed would be likely to exacerbate flooding issues. Shropshire Council have not submitted any technical evidence to support this claim and to show how flooding would be improved and why this cannot be achieved without such development. This is again considered essential evidence that should be provided to establish that the claim that the housing would deliver improvements to an existing situation is technically feasible and realistic to count as an exceptional circumstance for the release of Green Belt.

3.22 The Plan states the housing extension will provide improved access into the town, to recreational open space and countryside in the Green Belt to enhance environmental quality and access. In support of its objection to this point the following reason is given:-

- Shropshire Council have provided no evidence to show how this would be achieved. For reasons given above, access to the town, recreational space and Green Belt is likely to be worse with significant additional traffic needing to access that space. The proposed new road network would not improve access, as access to these facilities would still have to be through the town. It is also difficult to substantiate that such a large development on existing unspoilt countryside, would improve “environmental quality” of the Green Belt. As the Green Belt Assessment stated, development of this land would weaken the contribution of the Green Belt.

3.23 The Plan states the these strategic opportunities will address the structural constraints affecting the function of the town and improve strategic physical, social and economic infrastructure. It is clear, therefore, that the proposed extension is not to meet the needs of the town itself, but to meet some future strategic need. The Town Council strongly objects to proposals to remove Green Belt on the basis of strategic not local needs. The views of the local community as stated above, are clearly against such a role for the town and the consequences of development scale, location and loss of Green Belt. It is not considered that there is justification for such a “strategic” expansion of the town and so this exceptional circumstance is unsupportable.

3.24 The recent large amount of housing approved made no provision for any improvements in existing off site leisure, and particularly sports, facilities for the town to meet the needs of the incoming residents. This has already placed great pressure on those facilities to meet the increased leisure needs of the town. As developers will only provide open space for their own residents within the development, the housing extension will not result in any gain in overall leisure provision, but will place an even greater burden on existing leisure, sports and social facilities in the town.

3.25 The Green Belt Review assesses the proposed land between the A4169 and railway land as having a High level of harm to the Green Belt. This parcel forms part of Parcel P17 in the Green Belt Review. This states that this parcel forms a large part of the critical gap between the settlements of Shifnal and Telford. Its release from the Green Belt would significantly weaken the integrity of the Green Belt in this area with regard to Purpose 2 (to prevent neighbouring towns merging into one another). The Review goes on to state that the parcel contains little urbanising

development, is open and forms an important part of the historic setting of Shifnal. It has a strong relationship with the large area of open countryside to the south and east. The Review concludes that releasing this parcel from the Green Belt would lead to a loss of open countryside and encroachment on neighbouring areas, weakening the role they play as Green Belt. By weakening the “critical” gap between Shifnal and Telford, the site would have a very significant adverse effect on the Green Belt. It is not considered that exceptional circumstances have been justified for the removal of Green Belt that would cause High harm., or proper comparisons made with alternative sites.

3.26 Shropshire Council have said that land between A464 west and M54 was not pursued because it would close the gap to Telford which needed to be kept open, and that it needed hard exceptional circumstances to consider development of that land. This same analysis applies to the site between the A4169 and railway, as this performs an identical function of keeping an open gap to Telford.

3.27 On the Preferred Sites consultation, Shropshire Council stated that they had asked the owners of much of the proposed Safeguarded Land to the south and west of the town for its inclusion. It was claimed that these parcels were required to meet highway issues. The Town Council do not consider it appropriate for Shropshire Council to ask for such a major removal of land from the Green Belt without first consulting with the local community. The Town Council do not consider that the highway issues supposedly behind Shropshire Council’s request to the developers to increase the land removed from the Green Belt, are realistic. There is, therefore, no justification for this proposal being put forward by Shropshire Council and for this area of land being removed from the Green Belt.

3.28 The Town Council are also concerned and object to Shropshire Council’s decision to in effect “allocate” future development proposals for much of the Safeguarded Land proposed. National Planning Policy Framework paragraph 139(d) states that such areas should not be allocated for development, especially as until a local plan is reviewed, it will not be known what development needs there are, at that time, that have to be met. Such allocation is inconsistent with the objective of Safeguarded Land providing a choice of sites and flexibility to meet longer term development needs. It also prevents the then local planning authority and the local community from making development and allocation choices at the appropriate time in the future when those needs are fully assessed. By already putting forward development proposals for most of the Safeguarded Land, Shropshire Council is acting contrary to national policy.

3.29 It appears that Shifnal is being treated differently to the other settlements in the Green Belt. There does not appear to be any proposed allocation of proposed development to Safeguarded Land in those settlements. No reason is given why Shifnal is treated differently, which reinforces the comments in the previous paragraph that Shropshire Council’s proposals for Shifnal are inconsistent and contrary to national policy.

3.30 The Town Council note that National Planning Policy Framework paragraph 136 states “ Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.” The Town Council consider, therefore, that any other changes to Green Belt boundaries to provide for

Safeguarding Land, should be deferred and left to a review of the Neighbourhood Plan which the Council have already agreed to undertake This would enable the local community to have a significant input to any such changes and reflects the approach to site selection proposed in the Plan for Broseley..

3.31 It is noted in the Water Cycle Study that Shifnal has constraints in both water supply and sewerage. On the former it states that any significant higher growth rate than that planned, would not be favoured and require a reassessment of the Water Resource Management Plan. On the latter, Shifnal is given a Red status that major constraints have been identified and upgrades required. Full consideration should be given to how these constraints would be met before proposing a major housing extension of the town by removing Green Belt.

3.32 The Town Council and local communities views (as endorsed in the Neighbourhood Plan) on protecting the Green Belt, and minimising the loss of Green Belt to Safeguarded Land, become even more important if the Government's proposals for a new Local Plan process as set out in Planning for the Future are implemented. The larger the amount of Safeguarded Land, the greater the chance that despite the so called protection still offered by such designation, it would be considered for Growth status, rather than protected as Green Belt would be. The town has already suffered the loss of Safeguarded Land to unplanned housing, and is concerned that any further large scale relaxation of stricter Green Belt protection, would offer an opportunity for similar further unplanned development on such land as a result of the Government's consultation proposals.

3.33 The Town Council also note that the proposed Safeguarded Land includes only part of the Sub Opportunity Sh-1a in the Green Belt Review assessment. The Assessment concluded that "this area is located close to the eastern settlement edge of Shifnal and is related to the intervening topography or containment created by existing development. It does not have a strong relationship with the band of open countryside between Shifnal and Albrighton. It is unlikely its release would significantly weaken the integrity of the Green Belt designation within this local area". The Review concluded that its release would cause Moderate harm. It is considered that no exceptional circumstances have been put forward to explain why only part of this Sub Opportunity area has been designated as Safeguarded Land and not the whole area, or why land which the Green Belt Assessed as Moderate-High harm, has been proposed when this Sub-Opportunity area would have a lower harm level.

B4. General Comments

4.1 The Town Council made several additional comments on the Preferred Sites consultation. As the Pre Submission Plan has made few changes to reflect the Town Council's previous concerns, then it is considered necessary to reiterate those comments below.

4.2 The local community are very concerned at infrastructure deficiencies in the town following the recent large housing developments approved, resulting in some 40% increase in the town's population. The Town Council fully support these concerns. There has been little if any investment in infrastructure (including roads and footpaths, new medical centre, education and leisure facilities) to support the town's expansion. There is agreement in the town that investment in such infrastructure is essential, and urgently required, to meet the currently approved schemes, before any further developments are permitted. Also, in view of the fact

that infrastructure improvements have not been implemented yet despite these developments nearing completion, it is considered essential that before any further development is approved, the necessary infrastructure investment to meet the needs generated by such development should be secured in advance, and the infrastructure works implemented concurrently with the developments.

4.3 National Planning Policy Framework paragraph 9 says that planning policies should take local circumstances into account to “reflect the character, needs and opportunities of each area”. The Town Council considers that the proposals for Shifnal do not take these local circumstances into account and, therefore, that the proposals for Shifnal are contrary to national policy. The amount of employment land is excessive to meet the needs of Shifnal; the large removal of Green Belt to the south-west and west to provide what is called a new neighbourhood community would significantly change the character of the town; and the proposed intention to change the capacity and role of the town to an inappropriate strategic function in this location (and to meet non local needs such as the Black Country unmet need); would not meet its needs and would restrict the opportunity for the local community to plan how it wants to develop in the future.

4.4 National Planning Policy Framework paragraph 15 states that local plans should be “a platform for local people to shape their surroundings”. In paragraph 16 (c) it also says that plans should be shaped by “...effective engagement between plan makers and communities...” It is considered that Shropshire Council have failed to take into account the views of the local community and the Town Council. It is acknowledged in the consultation that the local view is that the town retains the character and feel of a village and that the community largely wish it to remain so. This was reinforced in the Neighbourhood Plan where the local community’s view was that any development must retain the small market town character which was a principle attraction. But the present consultation proposals for Shifnal are in direct conflict with this view. As such, the proposals are contrary to national and Neighbourhood Plan policies.

4.5 Shropshire Council have still retained the significant increase in the amount of employment land from the original proposals, despite the Town Council objecting to the previous much smaller proposal. Together with the loss of such a large amount of Green Belt, especially on the west of the town where the community has consistently resisted its removal to protect the sensitive and small gap between the town and Telford, shows a disregard for long standing community views, even though Shropshire Council claim that local comments will be fully taken into account.

4.6 National Planning Policy Framework paragraph 136 states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Shropshire Council’s proposals are inconsistent in deciding land to be removed as Green Belt and retained, and contradictory in its justification arguments. As such, therefore, the consultation proposals are contrary to national planning policy.

4.7 National Planning Policy Framework states that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent. The proposed employment site and neighbourhood community land, fail to meet this policy. Yet again, therefore, the proposals do not meet national planning policy.

4.8 National policy requires the provision of local plans to have regard to a Neighbourhood Plan in force and that the views of the local community are important. Whilst it is recognised that the Neighbourhood Plan only goes to 2026, the principle issues brought forward by the community and underpinning the Plan, are still relevant and should be reflected in the Local Plan proposals. Of particular importance to the local community, as expressed through the Neighbourhood Plan process, were the importance of the character of the town for existing and new residents attracted to the town, and minimising any loss of Green Belt. The proposals take no regard to these principles – the amount of employment land and loss of Green Belt are excessive and not minimised to meet the needs of the town and safeguard the character of the town. They would have a significant and adverse impact on the character of town and the loss of so much Green Belt is unjustified and not supported by credible evidence to constitute the exceptional circumstances required to change Green Belt boundaries. Policies in the Plan now make it clear that Shropshire Council's objective is for the town to meet strategic not just local needs, with a significant expansion of the town proposed which would fail to safeguard its character which the community have consistently stated is of prime concern locally.

4.9 The Town Council also note that in the Plan for Market Drayton, it states that although their Neighbourhood Plan was not completed to adoption, "it is considered these central objectives of the Plan remain valid and worthwhile, and would improve the sustainability of the town". Despite the Shifnal Neighbourhood Plan being an approved plan, no such similar statement has been made for Shifnal (this is also inconsistent with Shropshire Council's statement that they have applied a common methodology in the Plan). The Town Council question, therefore, why it was considered appropriate to mention the need to reflect the Neighbourhood Plan objectives at Market Drayton, where the Plan was not proceeded to adoption, but not for Shifnal where the Plan is approved and adopted by Shropshire Council as part of the Development Plan. The Town Council consider that as Shropshire Council accept that the Local Plan strategy should reflect "closely" the key objectives in a Neighbourhood Plan, then its proposals for Shifnal should be amended as put forward by the Town Council and the local community, to reflect more closely its Neighbourhood Plan objectives.

4.10 No credible evidence has been given to support the reason for changing the original proposal on employment land; why the net developable area concept has not been used for other towns in Shropshire; why it was not considered appropriate in the early consultation proposals and what circumstances have changed since then to introduce it now; and why Shropshire Council accepted a consultant's study that only a much smaller amount of employment land was needed to meet the sustainable development needs of the town and so allowed previous employment land to be developed for housing, but now consider that was simply "wrong". This does not constitute sustainable planning grounds to justify now removing such a large area of

land from the Green Belt. The Town Council find it questionable as to why Shropshire Council permitted such a large amount of housing and on previous employment land/allocated employment land when it now seeks to justify such a large allocation on the basis of supporting sustainable development for a much smaller additional housing allocation.

4.11 The reasoning put forward for the proposals for the town are contrary to good planning practice and policies, are contradictory in their stated objectives and the reality of what is proposed, and are at odds with other decisions and comments made by Shropshire Council. The proposals take no logical and reasoned account of the Green Belt Review and its comments on the various parcels of land around the town.

4.12 The Town Council consider that Shropshire Council have failed to take into account the community's input into previous consultations and the Town Council's specific comments on the proposals in those consultations. Indeed, on the contrary, Shropshire Council made major changes to its proposals for the town from the early consultation, and retained these in the current Plan.

4.13 The Town Council consider, therefore, that Shropshire Council's proposals are contrary to national planning policy in a number of respects, fail to take into account community views as set out in the Neighbourhood Plan, and fail to be consistent in their application of assessments in the Green Belt Review. The Town Council are very concerned that Shropshire Council have not taken into account local comments made on previous consultations, but rather have made very significant changes without any prior consultation with the local community. Shropshire Council seem to be giving far greater weight to the wishes of landowners and developers to develop their land, than the residents of the town who have to live with the consequences of proposed policies and development allocation decisions.

B5. Nurton Developments

5.1 Nurton Developments have proposed that land to the south of Shifnal adjoining either side of Upton Lane, should be included in the Plan for development of 700-800 houses.

5.2 The Town Council consider that the development of such a large housing scheme in the Green Belt on such an open and skyline site, would be unacceptable. The size of development is out of scale with the character of the town and there is inadequate infrastructure to support such development. It would constitute unsustainable development. There are no exceptional circumstances to justify releasing the land from the Green Belt. The land south of the windmill is open and slopes down so that the development would constitute skyline development when approaching from the south, whereas at present the town is screened from view by ground contours. There would be no effective boundary to the town to the south.

5.3 It is also considered that, as an alternative to land proposed to the west, which forms part of the critical gap between Shifnal and Telford, is high quality agricultural land and of important community amenity value, part of the proposed site should be designated as Safeguarding Land. That part of the site between the existing Taylor

Wimpey development and the Windmill to the south, would extend the town in a logical location without encroaching above the skyline. It is also noted that in the Green Belt Assessment, part of the site is Sub Opportunity Area Sh-1a . The Plan has included most of this area as proposed Safeguarded Land but not this section. No reason is given in the Plan why this part of the same Sub Opportunity Area has been excluded.

C. Policy S21 – RAF Cosford – Disagree

C1. RAF Cosford excluding Air Ambulance Proposed Site

1.1 The Town Council maintains its strong objection to the proposal to remove the site from the Green Belt. It is considered that there has been no change in circumstances (and certainly not the exceptional circumstances required to justify removal from the Green Belt), since the previous local plan to justify removing the site from the Green Belt. It is noted that despite being in the Green Belt, there has been significant developments permitted and developed at both RAF Cosford and Cosford Museum. There have been no difficulties in either the RAF or the Museum in getting permissions for developments associated with their activities within the current policies, so there is no need to make a major change to the Green Belt here.

1.2 The current local plan policies specifically permit the specific developments proposed for the site. Indeed, whereas Core Strategy policy CS5 states that limited defence related development will be permitted, SAMDev policy MD6 not only permits additional development for military uses, but goes further than the Core Strategy and also permits redevelopment for economic uses appropriate as a major contributor to Shropshire's economy. This would, therefore, apply to all the development referred to as being proposed for RAF Cosford in the consultation document. The SAMDev policy in particular would not only allow for all the military development required by the MoD and RAF, but also that required for the Museum and the proposed Aviation Academy..

1.3 Reference was made in the previous consultation, to the Defence Review. This was exactly the same situation that applied when the previous local plan was being prepared and adopted with the site remaining in the Green Belt as a major developed site with specific policies allowing developments that would not compromise the future uses of the site. There was a defence review being implemented at that time, but national policies changed. With changes in Government and national priorities, there is no reason based on recent history, to assume that any current Review will be fully implemented. Even if it is, then current policies which have already been seen to facilitate any development required at the site, will meet future needs without the need to compromise the Green Belt status of the site. If the review changes as it has on previous occasions, then by retaining the Green Belt, gives planning control over how the site should be developed in the future.

1.4 There are, therefore, no exceptional circumstances, as required by national planning policy, to permit the removal of the site from the Green Belt. Military and museum proposals have not materially changed from the previous local plan, existing planning policies have not prevented or delayed appropriate development at the site, and those self same policies, especially policy MD6 in SAMDev, will

continue to permit all the developments outlined in the current consultation without requiring removal from the Green Belt.

1.5 The Plan primarily refers to specific military, museum and a complementary Aviation Academy and in an e-mail of February 2019, a representative for the site stated that there are no plans for the allocation of any MOD land at RAF Cosford for alternative uses. As stated above, the Base's development for these purposes has in no way been compromised by its Green Belt status and current planning policies fully support and allow for these future development proposals, so that there has been no change in circumstances and hence no new exceptional circumstances to support removal from the Green Belt.

1.6 However, despite the statements suggesting specific developments only for the site, the Town Council note that there are several policies and comments in the Plan that support unrelated economic development schemes to be allowed on the Base, through its definition as a new Strategic Site. It would appear, therefore, that the prime reason for the release of Green Belt is not for the specific developments outlined in the Plan, but to allow for future unplanned development to be allowed without having to first justify exceptional circumstances for such development if the Green Belt status was maintained.

1.7 It is noted, for example that since early 2019, RAF Cosford has been advertised in Shropshire Council's Invest in Shropshire brochure and on their website as a future investment opportunity site. It is described as a long term aspirational site for mixed use and as a potential new employment site that is subject to local plan review, but that the Council will consider making the site available for development in response to market demand. It would appear, therefore, that Shropshire Council had already pre-determined the site for removal from the Green Belt, as advertising its potential for development (with no restriction to military, museum use and complementary use only) well before the Strategic Sites Consultation in July 2019. Shropshire Council have submitted no evidence of this market demand that responded them to make the site available for development, in accordance with the statement on their investment opportunity sites.

1.8 By defining the site as a Strategic Site without any restriction tying future development proposals to those specifically stated in the Plan, proposed policies in the Plan permitting future employment development on such Sites, would allow for unrestricted additional employment development here if the site was removed from the Green Belt. Thus the Plan states that "economic growth and investment will be supported in...strategic sites"; "windfall Class B employment development... will be supported... if located on a Strategic Site"; "the Council's objective is to prioritise significant new development intoidentified Strategic Sites to create growth zones along the strategic corridors. RAF Cosford is stated to be a "significant location in the Shropshire Green Belt" in respect of two of these corridors.

1.9 The Plan also states that "Shropshire Economic Growth Strategy seeks to promote a 'step change' in the capacity and productivity of the local economy. The 'strategic corridors' have the potential to support this economic objectivethey may function as the location for the release of significant sites that are suitable and accessible for inward investment on identified 'Strategic Sites' at RAF Cosford ...".

1.10 The Plan states that “it will be essential when promoting development in the Strategic Corridors to essentially promote the Strategic Sites identified at...RAF Cosford...”. And “future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt”; “new employment development to serve the Albrighton community will primarily be delivered at the RAF Cosford Strategic Site”.

1.11 Shropshire Council state that RAF Cosford has been identified as a strategic site to facilitate its role as a centre of excellence for Defence training, to form a specialist aviation academy, for co-locating other MoD services and expansion of the Museum. However, it is clear from the statements quoted from the Plan above and the Council’s Invest in Shropshire brochure and investment opportunities webpage, that Shropshire Council want the site removed from the Green Belt so that there is no Green Belt issue to control whatever future employment development the Council want to allow here.

1.12 The Town Council has mentioned elsewhere in its comments on the Plan, that in view of the current economic climate and effects of Covid-19 on the economy, it is premature to remove such large areas of land from the Green Belt on the sole basis of an economic objective that is based on a policy that expires in 2021 and takes no regard of the likely long term impacts of Covid-19 on the scale of likely future new employment developments. Exceptional circumstances do not exist, therefore, to justify the release of 203ha of land from the Green Belt, especially for non-site related developments as proposed in the Plan

1.13 The Town Council draw attention to the plentiful supply of employment land already committed in neighbouring authorities within the Strategic Corridor. These include the I54 adjacent to junction 2 of the M54 which has 24ha available on Phase 2 (which could accommodate over 1msq.ft. of buildings) plus land available still under Phase 1. At Featherstone near Junction 2, a 24ha site will be able to develop some 850000sq.ft. The West Midlands Interchange is a major strategic site recently granted planning permission, with good access to the motorway network. It is stated that it could provide some 8500 jobs and 8m sq.ft. of buildings. This would be in addition to the proposed on site rail terminal which will be a major attraction to inward investment. This site is also close to a new development at Four Ashes where a 450000 sq.ft. building is available. At Sutton Coldfield, some 2..62m sq.ft. of buildings are being promoted. In Telford, a 10ha site at Newport is being developed and a 21ha site at Hortonwood. It is estimated that there is some 162ha of available employment land in Telford, plus a number of industrial units. There are also a number of large industrial buildings available in the West Midlands (eg Cannock, Wolverhampton, Willenhall, Hilton Cross), and a large business park at Stafford close to Junction 14 of the M6. Further, there will be competition from sites with a close connection to the proposed HS2 that are likely to be more attractive to strategic employment than Shifnal: it is noted for instance that a 140ha site next to a HS2 interchange is being promoted at Solihull which will provide 25000 jobs and 6m sq.ft of employment plus housing. In view of this existing supply of employment land, it is unrealistic to expect RAF Cosford to attract strategic employment outside its own military and related needs, and so would not constitute exceptional circumstances for the removal the site from the Green Belt..

C2. Proposed Midlands Air Ambulance Charity Site

2.1 The Town Council are concerned that different parcel reference numbers appear to be given to this site in separate documents but no clarification is given to confirm which numbers apply to this site and no plan is submitted to clearly show what assessments and comments apply to this site. The public should not be expected to search through various documents to try and establish what assessments and comments apply specifically to the site.

2.2 There is also concern that the Plan does not specify the size of land being proposed or how this relates to the specific needs put forward by MAAC. It is assumed from the difference in size of land to be removed from the Green Belt between the Preferred Sites and current consultation that the site is 18ha (203ha to 221ha). However, the Flood Risk Assessment for RAF Cosford which includes the MAAC site, refers to a total site of 218ha, which would give the MAAC site an area of 15ha. It is essential if Green Belt land is to be removed that there is no discrepancy in the precise amount of land proposed to be removed and that the minimum amount of Green Belt is used to meet the stated need.

2.3 It is noted that there was no mention in the Strategic Sites consultation response summary that any comment had been received from MAAC regarding a new site. No indication or evidence has been published as to when MAAC submitted details that led to Shropshire Council allocating this site subsequent to the Strategic Sites consultation, nor has that MAAC evidence been made available for the public to be able to assess the detailed case being put forward by MAAC to justify the site's removal from the Green Belt. Because this is not brownfield RAF Cosford land but greenfield Green Belt, it is considered essential that the specific needs of the MAAC can be assessed, to justify the allocation of this site. Particularly, there is no evidence given from the MAAC saying the minimum area of land they require and how this is justified amongst the different elements of their requirements for the site. Without such justification, exceptional circumstances for the release of this amount of land cannot be proven.

2.4 Information received direct from MAAC to representatives from the local community states that they do not require the size of land proposed to be removed from the Green Belt, nor intend all the development stated to be required for the site. An artists impression of the proposed base published in the press in August, does not equate with that allocated in the Plan. MAAC have specifically stated that the maximum area of land they require is 20 acres (8.1ha). This supports the Town Council's concerns that written evidence from the MAAC should be required to be made public so that there is no ambiguity in their specific needs for exceptional circumstances to be established, and that only the minimum area essential to meet these needs is removed from the Green Belt.

2.5 These concerns are enhanced by inconsistencies in statements in the Plan and by Shropshire Council at a SALC meeting with local Councils on 7th September. The Plan and the Green Belt Exceptional Circumstances Statement clearly state that the area coloured yellow on Plan S21.1 is solely to be used for the relocation of the Midlands Air Ambulance Charity. However at the SALC meeting, when it was pointed out that the proposed site was much larger than required by the Charity, Shropshire

Council's planning policy officer apparently agreed that the land proposed for release was far more than MAAC required, but that the additional land allocated, would probably be used for military training, industrial development or a college specialising in aerospace training. None of these proposed developments is included in the Plan and supporting evidence as being required on this site or listed as being the exceptional circumstances for releasing the land from Green Belt. The statement is also inconsistent with comments in the Plan that any additional military training requirements and an aviation academy would be located on the existing RAF Cosford base area proposed for release from the Green Belt. No indication is given of what industrial development needs there are in this area to justify taking such a large area out of the Green Belt. Nor is it explained how such unspecified development on the remaining area not required by MAAC would constitute and meet national and local plan policies on sustainable development. At the meeting it was also apparently stated that there would be no housing development on this remaining area, but there is no reasoning given as to how Shropshire Council would be able to prevent this occurring once the land is removed from the Green Belt, especially in view of other proposed policies in the Plan supporting in principle development in Strategic Sites

2.6 The Green Belt Assessment said that any new development that took place within the parcel of which the site forms part, and subsequent loss of openness, could lead to the perception that the westward growth of Cosford is narrowing the gap between Albrighton and Shifnal. This emphasises the need to ensure that if exceptional circumstances are considered to justify MAAC relocating to this area, then the minimum Green Belt area required to meet this need is used.

2.7 The Town Council are also concerned that the site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. Shropshire Council have no controls to ensure that the site is only developed for MAAC. Once removed from the Green Belt, the site can be used for any purpose. If MAAC decide not to pursue the development for whatever reason, or the landowner decides not to sell then the land once it has lost its Green Belt policy protection, then the land can be used for any development proposal, including residential.

2.8 This concern is reinforced by the comments made in paragraphs 1.8-1.12 above. Once the site is included as part of the Strategic Site, any employment related development could be allowed. This could prejudice the position of the MAAC, as the landowner may consider it more advantageous under proposed policies in the Plan, to develop it for alternative more profitable uses than MAAC.

2.9 The fact that Shropshire Council are proposing nearly double the site area that MAAC actually require calls into question the reasoning behind the size of site proposed and putting the site into the wider RAF Cosford Strategic Site. Although Shropshire Council state that the whole site is required for the MAAC, this is clearly incorrect, as MAAC have assured the local community that they require only about half of the site. This means that a significant part of the site would not be used by MAAC, but would be removed from the Green Belt and promoted for development as a Strategic Site. No exceptional circumstances have been put forward to justify such a large area of Green Belt being removed from the Green Belt and incorporated into a Strategic Site and as such the proposed allocation is contrary to national policy.

2.10 If it can be established that there is an overriding need for MAAC to relocate here, that the site proposed is the minimum necessary to meet that need, and that no alternative site is available outside the Green Belt or within the existing RAF Cosford, then the site should not be included as part of the RAF Cosford Strategic Site, but given a separate and specific allocation. It would also be appropriate to make such an allocation with the Green Belt notation retained over the site. This would protect the site from alternative development should MAAC not develop, or in the future to retain planning control over the site should MAAC cease to use it.

2.11 This would be an identical situation to the M54 Service Area just a few miles away at Junction 4 of the M54. The service area was a specific allocation in the Green Belt because of the essential need for it at this particular site. For this reason, to ensure that planning control was retained for any other use of the site should the service area not proceed or cease in the future, it was accepted that it was appropriate to allocate the site for the precise use but keep the site within the Green Belt. Again this would also be identical to the current position with RAF Cosford where policies allow for any developments related to the current uses without having to establish exceptional circumstances, whilst retaining the site in the Green Belt to protect the Green Belt and site from uncontrolled development unrelated to the exceptional reason for allocating the site for its specific use.

2.12 Alternatively, if this proposal is considered as an exceptional circumstance such that the land would only be approved for MAAC development, then there is no reason why the development could not be approved through the planning application process, rather than being proposed as an extension to a strategic site in the Local Plan. This would also enable stronger planning controls to be applied to ensure that the site was solely approved for, and developed for the intended purpose, which would not be possible as currently proposed in the Draft Pre Submission Plan. Indeed, MAAC have advised the local community that a planning application will be submitted within the next couple of months and that they need to start construction early in 2021 to meet grant time constraints. Thus the development is likely to be commenced even before the Pre-Submission Plan has been considered by Council and referred to the Inspector. This supports the Town Council's view that it is inappropriate to allocate the site in the Local Plan and that it should be considered through the planning application process as is the intention of MAAC.

D. Policies –SP10,11,12 /DP9

D1. Policies SP10,11 DP9

1.1 The Town Council are concerned that these policies would allow for unplanned development outside settlements. The public are entitled to expect some certainty in what is proposed in the plan for their area, with exceptions being treated on their own merits when such a proposal arises. However, these policies specifically allow for new economic development and windfall development in the countryside and particularly adjacent to settlements in a strategic corridor and in a strategic site. Thus, although a specific employment site is to be allocated for Shifnal, these policies would allow for significant new development to be permitted as a further extension to the town. Similarly, although the allocation of RAF Cosford, and its

proposed removal from the Green Belt is said to be for specific military and related use, these policies would allow for other non-related development to be allowed in the future, undermining the stated purpose for removing the Green Belt protection. This concern is enhanced by the policies saying that development would be allowed on strategic sites (RAF Cosford is included) where it cannot be accommodated on an existing allocated site.

1.2 It is noted that policy SP11 states that approval may be given for the release of a significant site with potential to function as a growth zone in a strategic corridor for larger employment or mixed use development. The Town Council supports the decision not to allocate land at J3 of the M54 as a garden village in this Plan, but notes that the wording of this policy would still allow such a development to be approved subsequently in the future.

1.3 It is also noted that reference is made that such unplanned inward investment may also need to be supported by the delivery of new housing and infrastructure to develop a growth zone. This would again open the door for a garden village to be promoted under this policy despite reassurances given to the public that such a proposal was not being proposed.

1.4 Policy DP9 also states that Cosford (not RAF Cosford) is a key centre in the East/M54 Strategic Corridor. However, Cosford is not listed as a key centre elsewhere in the Plan. It is not clear, therefore, to what area this refers to and why there is inconsistency in the Plan on the status of Cosford. If Cosford is to be defined as a key centre, then this raises further concerns about the amount of development that policies would permit here, the impact on Green Belt loss and compliance with sustainable community objectives.

1.5 The Town Council consider, therefore, that there is no need to in effect allow for any employment development outside settlements (especially as the Strategy refers to an urban focused approach), as this would undermine the stated proposals and policies for each settlement in the Plan. If a major proposal came forward for which a site within existing settlements was not available, then it could be considered on its own merits as an exception to policy, rather than as at present proposed where such development would be seen to comply with the Plan, contrary to other settlement and Green Belt protection policies.

1.6 These policies are considered, therefore, to be superfluous as they would give an almost carte blanche approval to economic development in a wide area outside established settlement areas, undermining the status of Green Belt and Safeguarded Land protection and stated reasons for allowing removal of Green Belt in the Plan. To reassure the public and give some certainty as to what can be expected for their area in the Plan, it is considered that at the most, an economic development policy should just state that any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.

D2. Policy SP12

2.1 As stated above, the Town Council support the decision not to allocate land at J3 as a garden village, considering that there are no exceptional circumstances for such a significant development in the Green Belt. However, it is considered that this proposal would give an opportunity (and potential policy support) for that scheme to be promoted again, undermining the certainty and assurances given to the public that this scheme would not proceed. After such a prolonged period of consultation, the public would expect that this decision was final, yet by including this policy in the Plan, allows the proponents of the scheme to yet again promote it in accordance with this policy. Although the policy refers to “meaningful public consultation”, this is open to wide interpretation depending on the point of view of the developer, planning authority and public.

2.2 The Plan gives little explanation for the reasoning of this policy. There is no reason why any proposals by an Estate could not be considered as and when they arise under the other policies of the Plan. By approving a “long term vision and objectives” – which by definition may not be development specific, could allow for a degree of future flexibility that would prejudice the public’s ability to have a say on a specific development proposal, as a decision in principle would already have been allowed.

2.3 The Town Council, therefore, object to this policy as being unnecessary and prejudicing the future protection of Green Belt and public participation on development proposals.

E. Legal/Procedural Issues

1.1 The Town Council question the adequacy of consultation and whether it has been supported by proportionate and appropriate evidence as required by several legal and procedural requirements.

1.2 Allocation of sites have not been properly assessed during the preparation of the Plan under sustainability appraisal requirements, and failed to demonstrate the reasons for rejecting reasonable alternatives. No maps have been provided in many documents (eg SLAA, sustainability appraisals) to enable the public to identify sites, or a search has to be made of other documents.

1.3 It appears that there has been pre-determination with some proposals in the Plan, such as the allocation of employment land in Shifnal and removal of RAF Cosford from the Green Belt as a strategic site.

1.4 There has been inadequate time for consideration and response on the current Draft Pre Submission consultation. Only 8 weeks has been allowed and this over the main summer holiday. This is the same as on the Preferred Scale and Distribution consultation and the Issues and Options consultation, neither of which was over a holiday period. It is less than either the Preferred Sites consultation or the Strategic Sites consultations (9 and 10 weeks, although it is noted that para 2.2.22 in the Plan states that the former was a 12 week consultation). The Strategic Sites consultation

was also only for 4 sites. The current consultation not only covers the whole County, but also includes a number of new policies (35) and a huge amount of evidence documents comprising in excess of 11000 pages, many of which have not been available for the public to view before this consultation began. The Plan itself refers to over 50 different pieces of evidence that it says have been used to prepare the Plan and many of these have a number of appendices. The amount of information and proposals that are now being consulted on, is significantly greater than that on any previous consultation, yet the period allowed for consideration and response is less than previous consultations and the same as much “smaller” consultation proposals outside a holiday period.

1.5 The inadequacy of the consultation period is further reflected in that Shropshire Council approved at Cabinet on 7th September to a 12 week consultation period on a revised Statement of Community Involvement (SCI) which is only 25 pages long. The consultation period is also not during a holiday period. The Town Council has previously pointed out that a 12 week period is widely accepted as a reasonable consultation time period. Shropshire Council stated at Cabinet on 7th September that the SCI is only a single consultation whereas the Draft Pre Submission consultation is the fifth for the Local Plan. They stated that the public, therefore, had had significant opportunity to “input in a meaningful way”. However, this fails to take into account the different information, changes and amount of new material that the current consultation expects the public to digest and comment on. The number of new policies, huge amount of new evidential documents, major changes to the Plan and extension of the period of the Plan, are all new material that was not available for the public to comment on in previous consultations. It is inappropriate, therefore, to simply use the number of consultations as a basis for comparison of consultation time periods rather than the scale of material that the public are expected to consider in each consultation, especially as the Draft Pre Submission Plan would have a far greater impact on local communities than the Statement of Community Involvement. It is considered that this inconsistency in consultation period is legally unsustainable.

1.6 The period allowed has also been reduced by the fact that several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half has not been put on the evidence base. This is contrary to the statement on the Councils website on this consultation that “An extensive evidence base has informed the preparation on the Pre-Submission Draft of the Shropshire Local Plan. The evidence base can be viewed in our Planning Policy section “. Thus although the Plan consultation states that these pieces of evidence have been used in the preparation of the Plan and its proposals, it has not been possible to view some of this evidence or to be able to access it without a detailed search of the Council’s website. This is contrary to Government advice that documents forming part of the evidence base should be published on the website in an accessible format as soon as they are completed and should not wait until options are published or a local plan is published for representations, so that the community are kept informed and involved.

1.7 It is not considered that evidence has been submitted to show that consultation responses have been taken into account and why decisions have been taken contrary to those responses.

1.8 Particularly having regard to the restrictions of Covid-19 on the ability of the public to engage in the Review, maintaining an up-to-date website and documents is essential for the public to know the latest position on the process. There are several examples of this not being implemented. In February 2020, Shropshire Council decided to extend the period of the Review from 2036 to 2038. However, up until the current consultation in late July, the website still referred to the period as 2016-36. No explanation was given on the website for the change and the current consultation simply states the new end date without clarifying that this has changed from the previous consultation.

1.9 Government guidance states that the Local Development Scheme (LDS) must be made available publicly and kept up-to-date, as it is important that local communities and interested parties can keep track of progress. It states that the scheme may need updating more frequently than annually if there are significant changes in timescales. At the Cabinet meeting in February 2020, it was stated that the LDS will be amended. A further change to the timetable was agreed at Cabinet in May. At the Cabinet meeting in July 2020, further changes were made to the timescale, and it was again stated that the LDS will be revised to capture this change. Yet since February and indeed during the consultation period of the Draft Pre Submission Plan, the LDS available for the public to view on their website is June 2019. This still states that submission to the Secretary of State will be June 2020. Up until the middle of July, the Local Plan Review website said that “the specific timescales for the partial review of the local plan are documented within the Local Development Scheme”. In view of the decisions taken in February and May, this was clearly incorrect and misleading to the public.

1.10 The Green Infrastructure Strategy is one of the evidence documents quoted as supporting the Plan. However, consultants did not commence this until February 2020. The Town Council was consulted to provide information and comments but was only given 12 working days to respond. This was inadequate for the Town Council to be able to consult the community, fully assess existing green infrastructure in the town and then to prepare a detailed and considered response on an important infrastructure issue; and for consultants to be able to produce a strategy for the town that would take full account of the local community's views.

1.11 The Council's Statement of Community Involvement (SCI) has not been updated since 2011 to take account of changes in the process of local plan making since then (a report to Cabinet on 7th September refers to a review in 2014 and that the SCI was approved then – however, the website only refers to the SCI approved on 24th February 2011 and this is the only version that is on the website). This is contrary to Government advice which states “Local planning authorities must review their Statements of Community Involvement every 5 years from the adoption date. It is important that Statements of Community Involvement are kept up-to-date to ensure effective community involvement at all stages of the planning process. Therefore, a local planning authority should regularly review and update their Statement of Community Involvement to reflect any changes to engagement.”

1.12 In May the Government issued guidance on the need for local planning authorities to review and update their Statements of Community Involvement to take account of the restrictions imposed on effective public engagement from Covid-19.

The guidance suggested various proposals for authorities to consider, including using online engagement to its full potential, and that authorities will need to take reasonable steps to ensure sections of the community that don't have internet access are involved and consider alternative and creative ways to achieve this. The Council has not updated its SCI since 2011 and has not amended it to take account of the updated advice in May. It has not shown, therefore, that it has published an updated community involvement plan for this consultation that complies with Government advice on enabling effective engagement in the process for all sectors of the public under the current Covid-19 restrictions.

1.13 It is considered that the Council has not complied with its published SCI. In particular, references to having a meaningful dialogue and constructive engagement with local communities and Town Councils; stating how people's views have been handled; reporting back to communities on a regular basis; showing how the public's views have been incorporated into the process; reporting on the findings of community involvement and publishing event summaries of community events.

F. General Comment

.1 The Town Council are concerned about the potential implications in the White Paper Planning for the Future. It is accepted that the final shape of any planning reforms may well be different to the initial proposals but they are concerned that decisions made under the current regime may have unintended consequences for the future. This concern particularly applies to the extensive changes from green belt to safeguarded land proposed for Shifnal where there must be a danger that safeguarded land could immediately be classified as a "Growth" area immediately developable rather than a "Protected" area not developable until post 2038. The Town Council recommend that that Shropshire Council consider the implications of the White Paper in determining the next stage of the review. it is likely that the planning reforms will mean that the Local Plan now being considered will need revisiting in the relatively near future. In the context of the White Paper the Housing Minister recently stated that " We want communities to have their say on setting the plan" - this is what Shifnal Town Council wants now.