



The countryside charity Shropshire

Examination of Shropshire Local Plan 2016-2038

Stage 2 Matters, Issues and Questions

Matter 21 – Shifnal Place Plan Area (policy S15)

CPRE Shropshire Hearing Statement

Representor refs: A0410 and B-A127

20 September 2024

1. Our Hearing Statement for Matter 21 follows the MIQs as set out in document ID40.

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

Issue

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

Sites

SHF013 – Land adjoining Meadow Drive, Shifnal

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

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

2. The above three sites are the only ones listed in the MIQs document ID40. However, Policy S15 also lists the following sites, which are not captured in the above MIQ list.

SHF018b & SHF018d – Employment land east of Shifnal Industrial Estate, Upton Lane, Shifnal

Safeguarded land	Site area (hectares)
Land adjoining junction of Stanton Road and Lamledge Lane	4.5
Land adjoining Shifnal Hillcrest School and Shifnal Industrial Estate	9.4
Land between Revells Rough, Lamledge Lane and the eastern rail line	10.4
Land between A464 (south) and Park Lane	9.6
Land between Park Lane and A4169 at Lodge Hill	46.1
Land between A4169 and the western rail line	12.8

3. These should also surely be included within the Matter 21 considerations. Paragraph 5.217 of the Draft Plan specifically indicates that the safeguarded land is proposed to be released from the Green Belt within this Plan period when it states that:

To realise the potential of Shifnal, it is necessary to release significant land parcels from the Green Belt. These land parcels will be safeguarded for future development except for the employment land releases which will be allocated for development as part of the current Local Plan strategy.

4. The fact that this safeguarded land may not be allocated until after the current plan period does not detract from the fact that it is this Draft Plan that is proposing to remove this 92.8 hectares

of land from the Green Belt. This is also made clear within policy SP11 - Green Belt and Safeguarded Land, particularly by Table SP11.1 - Green Belt Release by Location and Type.

5. We also continue to believe that site references should be given for the five parcels of safeguarded land listed above, in order to aid their identification. We cannot see that this has been proposed in either of the updated schedules of Major and Minor Modifications.

Questions

6. We are essentially commenting further in this Hearing Statement only on question 12 as below.

Q12. Are the detailed policy requirements effective, justified and consistent with national policy?

7. We re-emphasise what was said in paragraphs 19.9 – 19.11 of our Regulation 19 submission of February 2021 about the repeated mixing of the figures of 40 Ha and 16 Ha for employment land, which led us to wonder whether the Council had simply got the sums wrong in the same way as was done within Table 6 on page 40 of the Preferred Scale and Distribution of Development consultation document. The fact that *'employment land is developed out to 40% of the total land area'* has already been accounted for in the formula arriving at the initial guideline for Shifnal of 16 Ha of employment land. The Council now seems to be incorrectly grossing up again at 40% for a second time in moving from the 16 Ha to the 40 Ha figure.
8. We therefore concluded that the proposed allocation of 39 Ha of employment land at SHF018b & SHF018d is not based on proportionate evidence, is therefore not justified, and is therefore unsound.
9. Shropshire Council had the opportunity to respond to these queries about their calculations (to provide balanced growth) in their Summary of Representations on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan dated July 2021 (document SD014.01), but do not appear to have addressed our specific points. They did say, within their responses to our comments on policy S15, at electronic page 778 (Schedule 2: page 728) :

On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the

community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015.

10. This recognises that Shifnal had become out of balance following the unplanned growth when the Council could not prove a five-year supply of housing land. But it does not justify why such a comparatively high quantum of employment land is now thought to be required.
11. Similarly, we do not consider that it adequately explains why there is a justified need to release 92.8 hectares of development land – this is why we consider that the quantum of development land proposed to be released in this plan period from the Green Belt as safeguarded land needs to be reappraised.