## Shropshire Local Plan Examination Hearing Statement: Matter 21

Morris & Company Limited September 2024



## Shropshire Local Plan Examination Stage 2: Matter 21 Land to the South of Stanton Road, Shifnal

Contents		Page
1.	Shifnal Place Plan	1
	Whether the proposed Place plan Area and site	j
	allocations within it are justified, effective and	
	consistent with national planning policy.	1
	Introduction	1
	Shifnal's Role in Meeting Black Country	
	Employment Needs	1
	Need for Additional Housing Growth	1
	Justification for Further Green Belt Release	2
	Allocation of Site SHF018a	2
	Conclusion	2

## 1. Shifnal Place Plan

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

Introduction

- 1.1. This hearing statement is submitted on behalf of Morris & Company Limited regarding their land interests at Site SHF018a Land to the South of Stanton Road, East of Shifnal. We contend that Policy S15.1 for Shifnal is not justified, effective or consistent with national policy for the following key reasons:
  - The development strategy fails to reflect Shifnal's new role in meeting Black Country employment needs
  - Insufficient housing growth is proposed to balance the significant employment allocation
  - Further Green Belt release is justified to meet development needs
  - Site SHF018a should be allocated for mixed-use development

Shifnal's Role in Meeting Black Country Employment Needs

- 1.2. The Updated Housing and Employment Topic Paper (Section 16) identifies Shifnal as an appropriate location for accommodating unmet employment needs from the Black Country, due to its geographic proximity and strong connectivity via the M54/A5 corridor. Policy S15.1 allocates 39 hectares of employment land at Site SHF018b & SHF018d. However, the overall development strategy for Shifnal has not been updated to reflect this significant change in the town's role and function.
- 1.3. We argue that the development strategy should be amended to explicitly recognise Shifnal's new status as a key location for meeting sub-regional employment needs. This would ensure the plan is justified based on proportionate evidence and effectively addresses the wider strategic context.

Need for Additional Housing Growth

- 1.4. The allocation of 39 hectares of employment land represents a major change for Shifnal. However, the housing requirement remains largely unchanged from the previous plan period. To create a sustainable, balanced community, additional housing growth should be provided in Shifnal to support the significant increase in employment land. This would:
  - - Provide housing for workers at the new employment sites
  - - Reduce unsustainable commuting patterns
  - · Support local services and facilities
- 1.5. We propose that the housing requirement for Shifnal should be increased proportionately to reflect the scale of employment growth proposed. This would ensure the plan is effective in delivering sustainable development and maintaining a balance between homes and jobs.

1.6. The current approach risks creating an imbalance between employment and housing provision, potentially leading to increased in-commuting and unsustainable travel patterns. By failing to provide sufficient housing to support the employment growth, the plan may not be effective in delivering its sustainable development objectives.

Justification for Further Green Belt Release

- 1.7. The Local Plan proposes releasing land from the Green Belt to accommodate the 39-hectare employment allocation. We contend that the exceptional circumstances justifying this release also apply to further land release for housing. Paragraph 141 of the NPPF states that "where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport."
- 1.8. Shifnal is well-served by public transport, with a railway station and bus services. It is also close to the strategic road network. Therefore, it represents a sustainable location for further growth through Green Belt release. We argue that additional land should be released from the Green Belt and allocated for housing development to ensure a balanced strategy for Shifnal.
- 1.9. The current approach of releasing Green Belt land for employment but without adequate balance for housing creates an inconsistency in the plan's approach to Green Belt release. By not considering further release for housing, the plan misses an opportunity to create a more sustainable and balanced community in Shifnal.

Allocation of Site SHF018a

- 1.10. Site SHF018a Land to the South of Stanton Road, East of Shifnal should be allocated for mixed-use development including housing and employment uses. The site:
  - Is well-related to the proposed employment allocation SHF018b & SHF018d
  - Has strong, defensible boundaries
  - Is in a sustainable location close to services and facilities
  - Could deliver a significant number of dwellings plus supporting infrastructure and employment
- 1.11. Allocating this site would help address the need for additional housing provision and create a more balanced overall development strategy for Shifnal. It would ensure the plan is justified and effective in meeting development needs.
- 1.12. The site's location adjacent to the proposed employment allocation makes it particularly suitable for mixed-use development, creating a cohesive urban extension that integrates housing and employment uses. This approach would be consistent with the NPPF's emphasis on making effective use of land and promoting sustainable patterns of development.

Conclusion

1.13. For the reasons set out above, we contend that Policy S15.1 is not currently justified, effective or consistent with national policy. To address these issues, the

## following changes should be made:

- Explicitly recognise Shifnal's role in meeting sub-regional employment needs
- Increase the housing requirement proportionately to balance employment growth
- · Release additional land from the Green Belt for housing
- Allocate Site SHF018a for mixed-use development
- 1.14. These modifications would ensure Policy S15.1 provides a sound strategy for the sustainable development of Shifnal over the plan period. Without these changes, the plan risks creating an imbalanced community with insufficient housing to support the proposed employment growth, potentially leading to unsustainable development patterns and missed opportunities for integrated, sustainable urban extensions.

