

## **Shropshire Local Plan Examination: Stage 2**

Representor Unique Number: A0682

Representor: Miller Homes

Matter: Matter 21 – Shifnal Place Plan Area (Policy S15)

Relevant Question Numbers: Questions 1-12

# Matter 21 – Shifnal Place Plan Area (Policy S15)

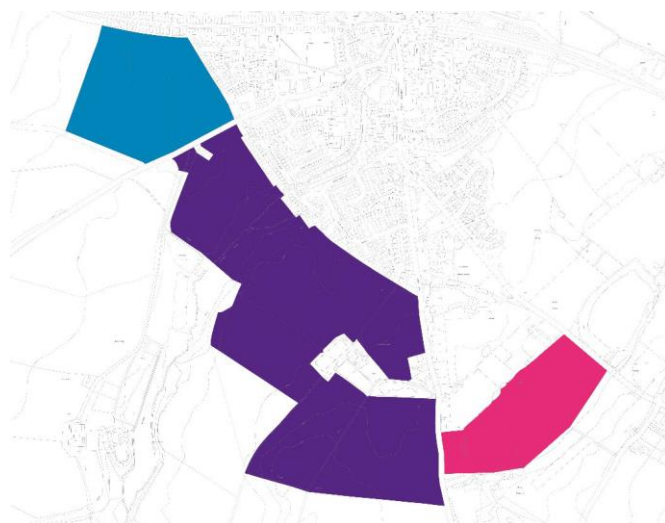
## Miller Homes (A0682)

1. This Hearing Statement is submitted on behalf of Miller Homes (“Miller”).

### Context: South West Shifnal

2. Miller’s representations are made in relation to c.65ha of land it is promoting at “South West Shifnal” as identified on the Site Location Plan at **Appendix 1**.
3. Policy SP11(2) (or as amended via the proposed Main/Minor Modifications) sets out that *“Safeguarded land, being land removed from the Green Belt for future development needs beyond the current Local Plan period, is shown on the Policies Map.”* The “Draft Shifnal Place Plan Area Inset Map” (Examination Document Ref: SD005.15-S15) identifies South West Shifnal as “Safeguarded Land” (in blue), however there is no policy reference number for each of the safeguarded sites.
4. Policy S15 “Shifnal Place Plan Area” provides further detail on the safeguarded sites around Shifnal with Schedule S15.1(iii) “Safeguarded Land: Shifnal Key Centre” dividing the Site into three separate parcels, as identified within Figure 1.1:
  - Land between A464 (south) and Park Lane (9.6 hectares) (pink);
  - Land between Park Lane and A4169 at Lodge Hill (46.1 hectares) (purple); and
  - Land between A4169 and the western rail line (12.8 hectares) (blue).

**Figure 1.1: Policy SP11 Safeguarded Land Parcels**



5. It is noted that Matter 21 focuses upon the proposed allocations within Shifnal, and does not include the opportunity for considerations to the proposed safeguarded designations within Shifnal. Given Policy SP11 confirms that safeguarded land is “*land removed from the Green Belt for future development needs beyond the current Local Plan period,*” Miller consider that it is this designation is robustly assessed as part of the Examination.
6. On this basis, the following section of this Hearing Statement has been prepared to answer each of the questions in relation to South West Shifnal only. This Hearing Statement is accompanied by the following appendices demonstrating the delivery of South West Shifnal:
  - Illustrative Masterplan (**Appendix 2**);
  - Illustrative Masterplan (Phase 1) (**Appendix 3**); and
  - Illustrative Phasing Plan (**Appendix 4**).

## **South West Shifnal**

### **1. What is the background to the site allocation? How was it identified and which options were considered?**

7. The wider site (SHF034) was assessed in the “Strategic Sites Assessments” of the Sustainability Appraisal (Appendix T, Examination Document Ref: SD006.21), achieving an overall sustainability score of -2 and therefore rated “Good” at Stage 2a (for housing); this score was the highest for all strategic sites at Shifnal and the best of all safeguarded land adjoining the town. It should be noted that SHF034 included land to the north of the railway line, which is not included within the boundary for South West Shifnal, and this is not included within the designated safeguarded designation within the Draft Local Plan.
8. Each of the individual parcels forming SH034 were also assessed. Appendix P (SD006.17) includes individual assessments of the sub-parcels of the site (SHF019, P15b west, SHF019VAR, SHF017 and P16a) and Stage 3 recommended that all these parcels be removed from the Green Belt and safeguarded. The “strategic considerations” and “reasoning” sections of the Stage 3 assessments considered each of the parcel’s contribution to wider proposed site (SHF034) and provided justification for their contribution towards the safeguarded site.
9. Please refer to our Stage 2: Matter 1 Hearing Statement for matters relating to the Sustainability Appraisal.
10. Paragraphs 5.201 to 5.217 (or as amended via the proposed Main/Minor Modifications) of the Plan provide the explanation for the site allocations within Shifnal and the proposed safeguarding designations. The main justification for not including the proposed safeguarded sites as allocations is to allow the community some “respite” following the growth of Shifnal since 2016 (Paragraph 5.205) (or as amended)
11. The Draft Local Plan acknowledges that South West Shifnal will eventually comprise a “...*strategic housing extension capable of creating a new community...*” and explicitly lists benefits and infrastructure improvements (Paragraphs 5.215 and 5.216) (or as amended) No other safeguarded site has been similarly identified in the Draft Local Plan which properly reflects its credentials as a sustainable site which can deliver strategic benefits for Shifnal, as recognised in Paragraph 5.217 (or as amended) of the Draft Local Plan.

## 2. What is the scale and type/mix of uses proposed?

12. The land being promoted at South West Shifnal comprises c. 65ha to form a strategic-scale new community able to deliver:
- Circa 1,200 dwellings;
  - A link road between the A464 (south) and the A4169 to help ease highway capacity issues in the town centre (recognised in the Draft Local Plan at Paragraph 5.216 - (amended to Paragraph 5.221 via Minor Modification AM101));
  - A school car parking drop-off point and new footway on Park Lane to ease existing congestion;
  - Provision of land for a new primary school to ease existing capacity issues;
  - A local centre, including a new health centre and new retail facilities;
  - New active travel routes providing links between existing communities and the wider countryside, including the potential delivery of a link between public right of way ref. 0141/12/1 and Stafford Avenue, as identified in the Green Infrastructure Strategy (EV052-20, p12);
  - Flood management measures to the Wesley Brook corridor, which is included as part of South West Shifnal, including significant new areas of green infrastructure and habitat creation (as identified in the Green Infrastructure Strategy EV052-20);
  - Contributions to off-site highway junction improvements and public transport;
  - Provision of significant areas of new open space; and
  - Significant affordable housing provision to redress worsening levels of affordability
13. An Illustrative Masterplan has been prepared to demonstrate how this could be delivered at South West Shifnal and is enclosed.

## 3. What is the basis for this and is it justified?

14. Delivery of new homes in Shifnal is justified. Shifnal is the largest “Key Centre” in Shropshire and benefits from a highly sustainable location on the M54/A5 strategic road and rail corridor. As set out in the updated Green Belt Topic Paper (Examination Document Ref: GC46), *“the strategy for Shifnal should support the role and function of the town as an important Key Centre. This should increase the self-containment and sustainability of the community; ensure the longer-term sustainability of its services and facilities; and deliver housing and employment to meet the needs of the town and other communities in the Green Belt.”*
15. Further, the updated Green Belt Topic Paper highlights that the strategy for Shifnal cannot be achieved *“without delivering new development opportunities particularly to provide new employment to reduce the ‘dormitory’ character of the settlement and to deliver new investment in critical infrastructure to continue to meet the needs of the community.”* Such benefits represent the exceptional circumstances to justify the release of land from the Green Belt.



16. Looking to the basis for the scale and mix of uses proposed for South West Shifnal, Miller have prepared a range of evidence base documents which have been presented as part of the Vision Documents, and submitted in support of previous representations to the Plan. This includes input on Heritage, Transport and Social Infrastructure matters.

**4. What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?**

17. Beyond the Local Plan, the site does not have a current planning status.

**5. What are the benefits that the proposed development would bring?**

18. South West Shifnal will create a new community to the south of the town, providing key infrastructure improvements that will not only benefit new residents but will also benefit the existing community of the town.
19. The Draft Local Plan acknowledges this position, highlighting that South West Shifnal will eventually comprise a “...*strategic housing extension capable of creating a new community...*” and explicitly lists benefits and infrastructure improvements (Paragraphs 5.215 and 5.216). No other safeguarded site has been similarly identified in the Draft Local Plan which properly reflects its credentials as a sustainable site which can deliver strategic benefits for Shifnal, as recognised in Paragraph 5.217 of the Draft Local Plan.
20. As set out above, the benefits that South West Shifnal can bring include:
- A link road between the A464 (south) and the A4169 to help ease highway capacity issues in the town centre (recognised in the Draft Local Plan at Paragraph 5.216 - (amended to Paragraph 5.221 via Minor Modification AM101));
  - A school car parking drop-off point and new footway on Park Lane to ease existing congestion;
  - Provision of land for a new primary school to ease existing capacity issues;
  - A local centre, including a new health centre and new retail facilities;
  - New active travel routes providing links between existing communities and the wider countryside, including the potential delivery of a link between public right of way ref. 0141/12/1 and Stafford Avenue, as identified in the Green Infrastructure Strategy (EV052-20, p12);
  - Flood management measures to the Wesley Brook corridor, which is included as part of South West Shifnal, including significant new areas of green infrastructure and habitat creation (as identified in the Green Infrastructure Strategy EV052-20);
  - Contributions to off-site highway junction improvements and public transport;
  - Provision of significant areas of new open space; and
  - Significant affordable housing provision to redress worsening levels of affordability

21. These benefits are significant and are capable of being viably delivered as part of a phased delivery of the overall scheme.

**6. What are the potential adverse impacts of developing the site? How could they be mitigated?**

22. Each of the sites forming “South West Shifnal” have been assessed as part of the Sustainability Appraisal Appendix P Shifnal Place Plan Area Site Assessments (Examination Document Ref: SD006.17), which includes considerations to any potential adverse impacts of developing the site and Shropshire Council’s considerations to how they *could* be mitigated.
23. The key conclusion drawn through the evidence base is that all of the identified risks are capable of being mitigated through either physical works or careful design of the scheme that is brought forward on the site. For example, heritage risks relating to existing listing buildings in the vicinity of the site could be mitigated by undertaking a thorough assessment and locating buildings on site accordingly.
24. Miller would be pleased to work with the Council to address the risks that have been identified through ongoing engagement and refinement of the emerging masterplan for the site.

**7. How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?**

25. The Sustainability Appraisal Appendix P Shifnal Place Plan Area Site Assessments (Examination Document Ref: SD006.17) sets out that for each of the sites forming “South West Shifnal:”
- P16 – 94% in Flood Zone 1, with 2% of the site in the 30-year surface flood risk zone, 3% in the 100-year surface flood risk zone, and 7% in the 1,000 surface flood risk zone;
  - SHF017 – 95% in Flood Zone 1, with 2% of the site in the 30-year surface flood risk zone, 3% in the 100-year surface flood risk zone, and 7% in the 1,000 surface flood risk zone;
  - SHF019VAR – 100% in Flood Zone 1 with 0% of the site in the 30-year and 100-year surface flood risk zone, and 1% in the 1,000 year surface flood risk zone;
  - SHF034 – 98% in Flood Zone 1 with 1% of the site in the 30-year surface flood risk zone, 2% in the 100-year flood zone, and 5% in the 1,000 surface flood risk zone.
26. As is concluded in the SA, it is considered that any flood risk associated with development on the site can be addressed through appropriate mitigation measures.

**8. What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?**

27. As outlined within the representation submitted on behalf of Miller Homes in June 2024 (Examination Document Ref: A211 - Miller Homes), there are no current known infrastructure requirements to make the development suitable in planning terms, subject to relevant supporting studies to be undertaken.
28. For each individual site forming “South West Shifnal,” the Sustainability Appraisal Appendix P Shifnal Place Plan Area Site Assessments (Examination Document Ref: SD006.17) at Stage 3 considered that, in relation to whether there are known infrastructure requirements to make the development suitable in planning terms, relevant supporting studies should be undertaken and their recommendations implemented.

29. The site will, however, deliver a link road between the A464 (south) and the A4169 to help ease highway capacity issues in the town centre, as recognised within the Draft Local Plan.

**9. Is the site realistically viable and deliverable?**

30. Miller is promoting all of the land identified at South West Shifnal on behalf of the landowners. There are no known constraints that would prevent the site from being delivered.
31. Based on the appendix of the Strategic Land Availability Assessment (SLAA) (2018) (Examination Document Ref: EV106.02) each of the sub parcels (SHF019, P15b, SHF017 and P16) are all considered achievable and viable. Sub parcel SHF019VAR and the wider site SHF034 were not considered within the SLAA, however the sub parcels that were assessed form the wider site when taken as a whole.

**10. What is the expected timescale and rate of development and is this realistic?**

32. It is considered that should the site be allocated (rather than safeguarded), South West Shifnal can begin to deliver immediately on a phased basis, as set out within the Illustrative Phasing Plan enclosed at **Appendix 4**. This sets out how the site can be comprehensively delivered per the Phasing Plan (or otherwise agreed phasing plan).

**11. Is the boundary of the site appropriate? Is there any justification for amending the boundary?**

33. The boundary is considered appropriate.
34. As set out within the Updated Green Belt Topic Paper (Examination Document Ref: GC46), *“in identifying the two proposed areas of safeguarded land to be removed from the Green Belt and the remaining safeguarded land, due consideration was given to resultant Green Belt boundaries and the ability to provide for compensatory improvements to the Green Belt. This is consistent with the requirements of paragraphs 142 and 143 of the NPPF.”*

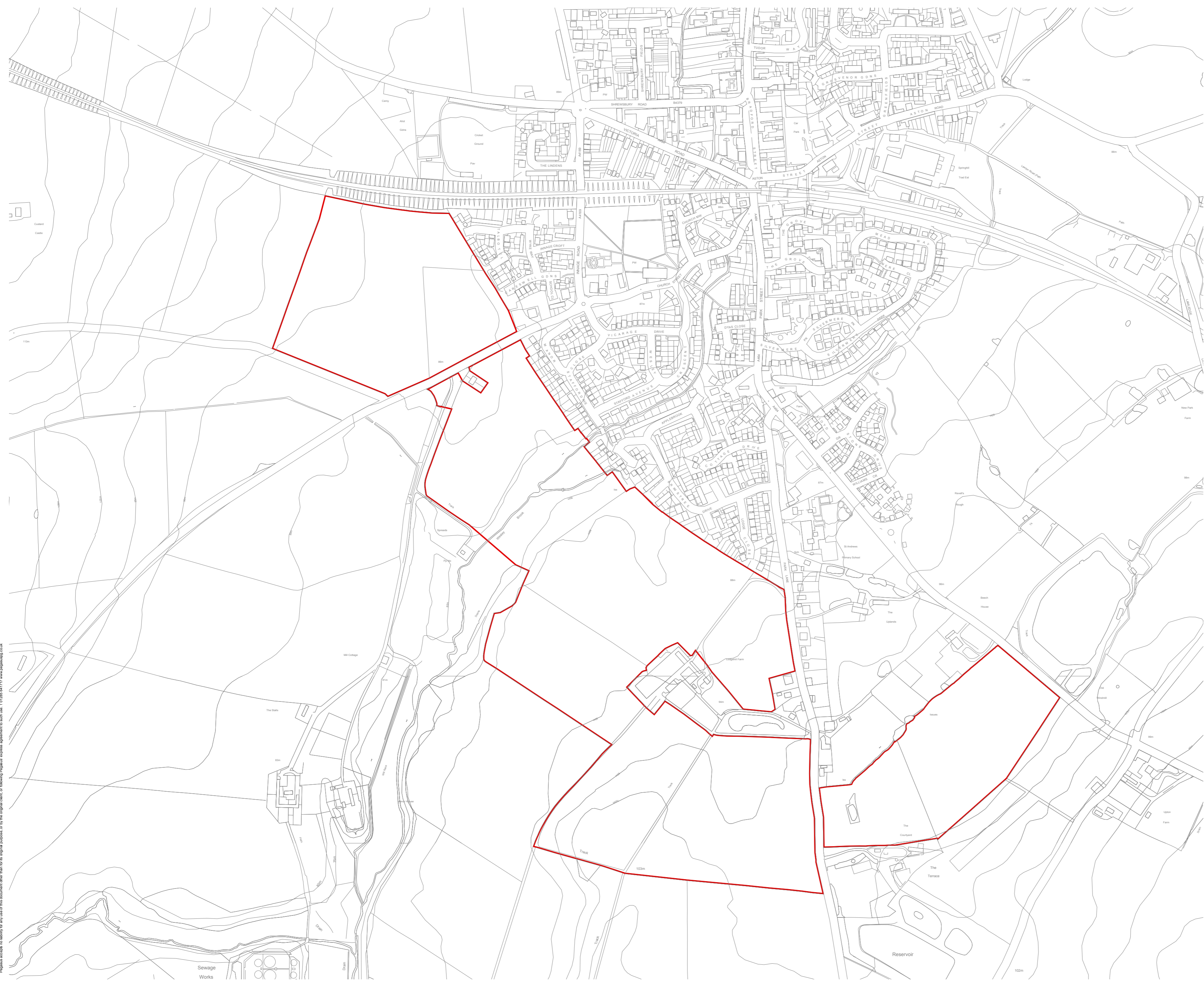
**12. Are the detailed policy requirements effective, justified and consistent with national policy?**

35. The proposed wording of the detailed policy requirements will be developed by Shropshire Council to be effective, justified and consistent with national planning policy.

**Appendix 1: Site Location Plan**



KEY  
Total Site Boundary  
64.5 ha / 159.4 acres



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**Appendix 2: Illustrative Masterplan**





- Key
- Site Boundary
  - Residential Development
  - Primary School
  - Local Centre (to Include Health Centre)
  - Existing Urban Extent
  - Public Open Space
  - Parks
  - LEAP
  - School 'Park and Stride'
  - Existing Vegetation
  - Proposed Vegetation
  - Primary Routes
  - Attenuation Ponds
  - Indicative Location of Intended Links
  - Existing Public Rights of Way



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**Appendix 3: Illustrative Masterplan (Phase 1)**





- Key**
- Site Boundary
  - Residential Development
  - Primary School
  - Local Centre (to Include Health Centre)
  - Existing Urban Extent
  - Public Open Space
  - Parks
  - LEAP
  - School 'Park and Stride'
  - Existing Vegetation
  - Proposed Vegetation
  - Primary Routes
  - Attenuation Ponds
  - Indicative Location of Intended Links
  - Existing Public Rights of Way





**Appendix 4: Illustrative Phasing Plan**





**Key**

	Site Boundary
	Phase 1A 4.64 Ha = 162 dwellings @ 35 dph
	Phase 1B 2.74 Ha = 96 dwellings @ 35 dph
	Phase 1C 6.49 Ha = 227 dwellings @ 35 dph
	Phase 2A 3.31 Ha = 116 dwellings @ 35 dph
	Phase 2B 3.02 Ha = 106 dwellings @ 35 dph
	Phase 2C 3.35 Ha = 250 dwellings @ 35 dph
	1fe Primary School
	Local Centre to Include Health Centre

