



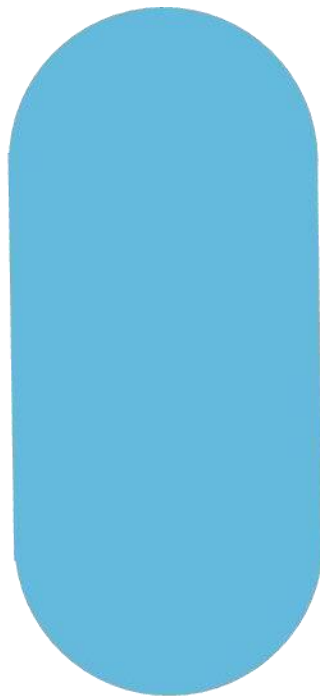
 Part of Shakespeare Martineau

Boningale Homes Limited

Shropshire Local Plan

Consultation on GC25, GC44, GC45 and

GC46





1. Introduction

- 1.1 This representation has been prepared on behalf of Boningale Homes Limited in response to the ongoing public consultation on the below listed evidence base documents prepared to support the emerging Shropshire Local Plan.
- GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs;
 - GC44: Shropshire Local Plan Updated Sustainability Appraisal Report 2024;
 - GC45: Updated Housing and Employment Topic Paper; and
 - GC46: Updated Green Belt Topic Paper.
- 1.2 This representation should be read in the context of support for the preparation of the Shropshire Local Plan. The comments provided within are designed to assist the Council in producing a Plan capable of being found sound, which is supported by a robust and consistent evidence base.
- 1.3 We consider that the approach being taken by the Council with regard to the quantum of development being planned for is appropriate and justified, however we have notable concerns relating to the identification of suitable land to meet the identified and justified minimum housing requirements.
- 1.4 Boningale Homes are promoting land at Albrighton South for a residential led development of up to 800no. residential dwellings, a secondary school, care home, supermarket and flexible employment space. We consider, given the proximity of the site to Wolverhampton and the Black Country, along with the Council's assessment of the development potential of the site within the Additional Sustainability Appraisal Assessment (GC44) that the Council should and indeed must, in order for their Plan to be capable of being found sound, allocate additional land, within Albrighton to meet the unmet needs of the Black Country.

2. GC25: The newly proposed draft policy on Housing provision for Older People and those with Disabilities and Special Needs

- 2.1 National Planning Practice Guidance on Housing for Older and Disabled People specifies that *“Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.”* It also specifies that *“The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.”*
- 2.2 The government have stated that the need to provide housing for older people is now critical (National Planning Policy Housing for Older and Disabled People (Paragraph 001)).
- 2.3 Boningale Homes support the recognition of the need to provide specialist housing to meet the needs of older residents in Shropshire. We consider that strategic residential developments offer an ideal opportunity to combine market, affordable and specialist housing viably, providing much need infrastructure and wider support for those within local communities that may require additional support.
- 2.4 Whilst the Council’s intention to address this urgent need, we object to the policy as currently drafted.
- 2.5 It is noted that the policy refers to all properties that are design to M4(2) and M4(3) standards should be designed to be ‘dementia friendly. Support text at paragraph 43 provides a link to guidance produce by the Alzheimer’s Society, but we consider that there is insufficient evidence within the policy to allow for consistent application by decision makers.
- 2.6 Further, in the absence of updated Viability evidence, it is unclear if the proposed M4(3) standards and the approach to ‘dementia friendly) design have been considered with regard to wider viability implications.
- 2.7 Local Plan policies should not contain such prescriptive requirements that could ultimately render an otherwise viable development opportunity viable.

- 2.8 We consider that with regard to this, it is essential that the Council produce an addendum/update to the Viability evidence and seek to establish sufficient flexibility within the policy that would allow for circumstances where deviation from the policy position is justified when sufficiently and robustly evidenced.
- 2.9 Whilst Boningale Homes support the option for delivering homes for key workers, we consider it necessary that criterion 11 of the draft policy is amended. As currently drafted the criterion states that proposals that include dwellings for key workers should be proactively considered. Once again, the wording of this criterion does not allow for consistent application by applicants or indeed by decision makers.
- 2.10 Criterion 15 of the draft policy states that on site allocations for 250 or more dwellings and all development sites for 250 or more dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 20% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs.
- 2.11 Again, it is unclear if this element of the policy has been subject to viability testing. It is imperative that, particularly with larger strategic sites, that are likely to deliver a range of infrastructure and facilities, that policies do not place overly restrictive requirements, such as that listed at criterion 15, on development proposals. Additional flexibility should be established within this policy to allow for application on a site-by-site basis. Additional clarity is further required with regard to the contribution that affordable units can make to the proposed requirement on strategic sites.
- 2.12 Boningale Homes support criterion 18 of the draft policy and consider it appropriate and justified that where evidence supports additional development beyond the level of growth set out within the defined strategy, housing to meet the needs of specialist groups will be supported.



3. Shropshire Local Plan Updated Additional Sustainability Appraisal Report

- 3.1 The Planning Inspectors Examining the draft Shropshire Local Plan released their Interim Findings paper (ID28) on February 15, 2023. This came after the first round of hearings, which covered legal and strategic matters (including strategic policies). The main Hearing Sessions took place in July 2022, and in January 2023, there was an additional session dedicated to the Duty to Cooperate.
- 3.2 In terms of SA, the Planning Inspectors come to the conclusion that further SA work should be done in relation to Policy SP2 and the Association of Black Country Authorities' (ABCA) Unmet Housing and Employment Land Needs. This was required for the evaluation of the draft Shropshire Local Plan, guarantee adherence to Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations (2004) and ensure the draft Shropshire Local Plan's legal compliance.
- 3.3 Within paragraph 13 of ID28 the Planning Inspectors conclude: *"In principle, the Council's intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire's housing need to meet some of this externally derived unmet need."*
- 3.4 In paragraphs 17–20 of ID28, the Planning Inspectors express their worry that the choice to meet part of the Black Country's land needs for employment and housing may have altered the objectives and parameters of the draft Shropshire Plan. These contributions were not taken into consideration by the SA, which tested options based solely on meeting Shropshire's needs, because this decision was made between the Regulation 18 and Regulation 19 stages of plan making, after much of the evidence base, including the SA, had been completed.
- 3.5 *As such, the Planning Inspectors explain within Paragraph 20 of ID28*



“Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country. In carrying out this work, consideration also needs to be given to the selection of the preferred strategy when judged against reasonable alternatives. For example, by testing a scenario which includes the originally envisaged ‘high growth scenario’ and a contribution towards unmet housing needs.”

3.6 *Within Paragraph 21 of ID28, the Planning Inspectors explain that if the intention remains to include proposed contributions to the unmet housing and employment land needs of the Black Country, then “the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.”*

3.7 It is reasonable to assume that without undertaking the necessary work, set out within ID28, the draft Shropshire Local Plan would not be capable of being found sound and the Council would in all likelihood, given the elongated Examination process to date, be asked to consider withdrawing the Plan or risk the Plan being found unsound by the Planning Inspectors.

3.8 As such, the Council have undertaken additional SA testing, as set out in the Updated Additional SA (GC44).

The Updated Additional SA

3.9 The updated additional SA assessment work included assessment of the three reasonable options for the housing requirement (each with and without a proposed contribution to the unmet housing need forecast to arise in the Black Country).

3.10 The updated additional SA assessment work concluded that none of the options are likely to result in a strongly negative effect.

3.11 It also concluded that only one option is likely to result is a strongly positive effect. This is Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs, which is likely to result in a strongly positive effect in the short, medium and long term on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society, and potentially in the long term on SA objective 4: promoting access to services for all sections of



society.

- 3.12 The updated additional SA assessment, aligned with previous iteration of the SA, ultimately concluded that on balance, Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs represented the most sustainable of the reasonable options for the level of housing growth identified. Further detail on the outcomes of this updated additional SA assessment work is provided within the Updated Additional SA Report.
- 3.13 Boningale Homes consider that Growth Option 3b is appropriate and fully justified and demonstrates that the Council area and continue to take a proactive approach to seeing economic and social growth for existing and future residents of the Plan area.
- 3.14 On the basis of the conclusion drawn by the Council with regard to planning to meet the requirements set out within Option 3b and aligned with the above references set out within the Inspectors Interim Findings (ID28) the updated additional SA considers option for accommodating the uplift.
- 3.15 Four reasonable options for accommodating the uplift were identified and assessed through the Updated Additional SA.
- 3.16 These are:
- a) Option 1: Increasing Settlement Guidelines and Windfall Allowances.
 - b) Option 2: Densification of Proposed Site Allocations.
 - c) Option 3: Increasing Site Allocations.
 - d) Option 4: A Combination of Two or More of the Other Options.
- 3.17 The SA process concluded that Option 1: Increasing Settlement Guidelines and Windfall Allowances. The Council's subsequent planning judgement exercise also concluded this was the most appropriate option for inclusion within the draft Shropshire Local Plan.
- 3.18 Boningale Homes have significant concerns about the conclusions set out within the Updated Additional SA, as is set out below, and support the identification of additional Allocations as set out under Option 3.
- Option 1: Increasing Settlement Guidelines and Windfall Allowances**
- 3.19 Within the proposed Shropshire Local Plan, settlement housing guidelines define the extent of residential development specifically allocated for a settlement. Key considerations in situations where the projected settlement



- housing guideline is either unlikely to be fulfilled or likely to be exceeded are summed up in Draft Policy SP7: Managing Housing Development.
- 3.20 Windfall allowances, which include "saved" SAMDev allocations and proposed allocations, are essentially the difference between the housing guidelines for settlements and the capacity of completions already achieved in the proposed plan period / identified commitments. This allowance may be attained by the emergence of more homes on "windfall sites," which are unplanned locations made possible by the draft Shropshire Local Plan, or by the emergence of more homes in a community from other sources.
- 3.21 Whilst Boningale Homes fundamentally support the allocation of development within the most sustainable settlements within Shropshire, thus supporting the principle of settlement housing guidelines, they do not consider it appropriate to limit sustainable development opportunities outside of the defined guidelines. To do so would be to prevent otherwise sustainable opportunities for growth in settlements, such as Tilstock, where meaningful housing growth could support significant infrastructure and wider social and economic growth and benefits.
- 3.22 Further, we have significant concerns with regard to the Council's stated reliance on windfall development, not least because with specific regard to meeting unmet housing needs, it is essential to ensure that growth is met as close to the area from which the need is arising and a reliance on windfall development does not allow for this to be controlled.
- 3.23 Unmet needs, in the case of assisting the Black Country, should be met as close to the Black Country as possible and should be located within an area that has strong structural, infrastructure and social connections.
- 3.24 As is detailed further below, Boningale Homes have submitted an outline planning application for the development of up to 800no. residential dwellings, land for a Secondary School, land for a Supermarket, land for a GP Surgery and Pharmacy, land for a Care Home and flexible employment space, to the south of Albrighton.
- 3.25 The site is physically as close to the Black Country as it is possible to be within Shropshire and is located on the main road connecting Shropshire to Wolverhampton. It is served by a train, providing regular services to Wolverhampton and Birmingham, and residents living within the development at South Albrighton, would have a range of sustainable



transport options providing a connection to the Black Country for work and for access to family and social networks for support. This is touched on further below in our response to Option 3.

- 3.26 In addition to concerns relating to the ability to strictly control the location and delivery of windfall development, we further consider that the Council simply have not justified or provided sufficient evidence to suggest that sufficient windfall development will come forward within the Plan period to account for the level of windfall development that is required within Option 1 to support the growth scenario set out in option 3b for wider development.
- 3.27 It is not positively prepared or justified to rely on existing commitments and windfall development to meet the indicative level of housing required. We consider additional housing land should be identified across the settlement hierarchy to provide assurance that the overall housing requirement will be delivered in full. Indeed, there may be circumstances where planning permissions lapse, sites do not progress, the impact of economic changes and, as such, the allocation of additional housing land for residential development in the Plan will provide a positive mechanism for such circumstances.
- 3.28 The Council will need to demonstrate very clearly, the expected sources of windfall development and details of previous rates of windfall development, significantly however, this should be across the settlements defined within Option 3, that have defined guidelines. The below shows the extent of windfall changes necessary to deliver Option1;



Settlement	Windfall Data	
	Proposed Windfall Allowance: Appendix 5 of the Draft Shropshire Local Plan (at 31st March 2019)	Current Windfall Allowance Reflecting Commitments & Completions (at 31st March 2023) ⁷
Albrighton	48	21
Bishops Castle	40	35
Bridgnorth	160	7
Broseley	50	-17
Church Stretton	121	84
Cleobury Mortimer	120	-5
Craven Arms	94	86
Ellesmere	170	130
Highley	31	9
Ludlow	82	57
Market Drayton	206	60
Much Wenlock	27	7
Oswestry	105	62
Shifnal	92	68
Shrewsbury	505	-81
Wem	89	94
Whitchurch	82	-55
Clive Barracks, Tern Hill	0	0
Former Ironbridge Power Station	0	-75

3.29 It should also be noted, that a reliance on unplanned, and to a large degree uncontrolled windfall development also has the potential to have a significant and negative impact on the provision of affordable housing and wider infrastructure benefits. The benefits of allocating strategic scale sites, where affordable housing will be a policy requirement and where additional infrastructure can be delivered should not be underestimated.

3.30 Shropshire, as with the entire nation, has a chronic and persistent poor record and undersupply of affordable housing, and it is particularly pertinent to note that as do the Black Country Authorities from which the need being planned for here is being identified, and as such, the risk in relying on smaller sites that could potentially fall below the policy requirement for affordable housing delivery, or might indeed have wider viability issues, should be given due and careful consideration by the Council.

3.31 Further, Option 1 may have a negative effect on the protection and enhancement of the range of plants and animals in Shropshire and the quality and extent of wildlife habitats because of the associated development.

3.32 This option may also have a negative effect on the reduction of flood risk/improvement of flood management and reduction of air



pollution/protection of air quality, particularly as it concentrates more development in urban areas.

3.33 This option would likely have a negative effect on the conservation and enhancement of landscape character and local distinctiveness, as whilst it focuses the additional development in existing urban areas, which is likely to minimise harm to rural landscapes, it is still likely to change the character of those places where the majority of people currently live.

3.34 As such, Boningale Homes, do not support the identification of Option 1 as being the most suitable option to meet the unmet housing needs of the Black Country.

Option 3: Identification of Additional Sites

3.35 This option would entail increasing site allocations in order to increase capacity. This could be through the extension of the site area of one or more existing proposed allocations and/or identification of one or more additional site allocations (such as through the early release of proposed safeguarded land, identification of new strategic site allocations or identification of new site allocations associated with existing settlements) in order to provide additional capacity.

3.36 Where this option would involve expanding the site area of one or more proposed allocations, it would still be in line with the urban focus principle because most proposed allocations are linked to urban settlements (though some are linked to rural settlements as well). If it involved identifying one or more urban focus areas, it may also stay consistent with the notion of urban focus, such as development at Albrighton.

3.37 This option would also likely support the encouragement of a strong and sustainable economy throughout Shropshire. However, the extent of this impact would largely be dependent on the location of any extensions to existing proposed allocations/new proposed allocations. Proposed site allocations are assessed separately within the SA process, and the impact of individual sites is considered in detail.

3.38 This alternative has the potential to be beneficial for a variety of SA objectives. All facets of society should be encouraged to access services; sustainable modes of transportation should be encouraged; driving less is necessary; carbon dioxide emissions should be decreased; communities that are active and healthy should be supported; and adaptation and



mitigation of climate change should be encouraged.

3.39 As is detailed above, we fundamentally support the identification of additional sites to meet the 1,500 dwellings unmet need from the Black Country. We do not support the intensification of existing allocation, where said allocations already meet the existing justified density set out within the Council's evidence base.

3.40 Whilst we do support the allocation of additional sites and the methodology set out within the additional updated SA with regard to the identification of an appropriate growth strategy, we have identified a range of inconsistencies with regard to the assessment of sites within CG44.

3.41 Through the updated SA site assessment process, a series of sites have been identified to accommodate the proposed 1,500 dwelling contribution to the Black Country. These are:

- a) BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
- b) SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
- c) IRN001 - Former Ironbridge Power Station: 600 dwellings

3.42 The additional updated SA considers each site, including the above against a range of criteria. The scoring for the above, and indeed the land at Albrighton South (P36a and P36b) detailed below, are as follows;

Criteria	BRD030	SHR060	IRN001	P36a/P36b
Settlement Conclusion	Fair	Fair	Fair	Fair
Black Country Conclusion	Fair	Good	Fair	Fair/Good

3.43 With regard to the above, we do not support the conclusion of in respect of P36 and the Black Country conclusion. We consider, that given the proximity and scale or proposed development the site should as a minimum score a high here.

3.44 Turning specifically to the development potential of the three sites listed above, we are concerned that there has been insufficient consideration given to the viability and ability for the sites to deliver a policy compliant level of affordable housing and the wider infrastructure required to make the



development otherwise suitable and sustainable for development. We further consider that the allocation of these sites does not make the best use of the strategic connections with the Black Country and that the Council should consider allocating sites, that are supported by technical evidence in terms of the proposed quantum of development and the infrastructure proposed being deliverable within the Plan period.

- 3.45 Noting the constraints listed within the SA in regard to each of these, including archaeological constraints, flood risk and drainage complexities, land assembly issues and some remediation requirements, we do not consider that the scale of development proposed will be deliverable within the identified Plan period.

Land at Albrighton South

- 3.46 As is detailed above, Boningale Homes are promoting land at Albrighton South. A planning application has been submitted to the Council and is awaiting validation. The application proposal comprises 800no. residential dwellings, a new Secondary School, a Supermarket, a GP Surgery and Pharmacy, a Care Home and flexible work space. The proposal will provide a policy compliant level of affordable homes and will create a new spine road and gateway into Albrighton.

- 3.47 The Council have considered the site within the additional updates SA under (along with some additional land) P36a and P36b.

- 3.48 The SA proposes to retain the land as Green Belt and concludes the following;

“Safeguarded land available to meet settlement development requirements along with infill and exception site opportunities.

The sites availability is currently unknown.

The site is considered to be located within a sensitive Green Belt parcel, the release of which would have high harm.

The site is poorly related to the built form of the settlement.

Whilst the site's size and location (proximity and connectivity to the Black Country) could mean that it is an appropriate location to meet cross-boundary needs arising in the Black Country, it is considered that there are other more appropriate sites upon which to accommodate these proposed contributions.



Development of the alternative sites identified to accommodate the proposed contributions to the unmet needs forecast to arise within the Black Country is considered to constitute sustainable development and accommodating parts of these proposed contributions on them would contribute to the achievement of the wider spatial strategy for Shropshire.

The site is therefore not proposed for inclusion within the draft Shropshire Local Plan”.

3.49 However, aligned with our above comments with regard to the proposed approach being taken to meeting the agreed unmet housing needs, it is incredibly pertinent to note the strategic considerations set out within the additional updated SA;

“There is safeguarded land to the east of Albrighton intended to make provision for settlement development needs.

This site is in Green Belt to the south of the settlement. As the sites availability is currently unknown, the site is not considered suitable for allocation. However it may have potential for future safeguarding.

The Green Belt Assessment undertaken for Shropshire indicates that this site is located within a Green Belt parcel which performs weakly against purpose 2; moderately against purpose 3; and strongly against purpose 4.

The Green Belt Review undertaken for Shropshire indicates that the release of the parcel containing this site would have a high level of harm on the Green Belt.

5% of the site is located within the 30 year surface flood zone, 7% within the 100 year surface flood risk zones and 15% within the 1,000 year surface flood zone.

Whilst the sites northern point is adjacent to the built form of the settlement, the site generally has a poor relationship to the built form of Albrighton and projects into the countryside.



The site may have archaeological potential.

The site is located within a source protection zone, Environment Agency Guidance will need to be considered. The site contains grades 1/2/3 agricultural land.

Applying the precautionary principle this is considered best and most versatile agricultural land.

The site is situated in Albrighton, which benefits from proximity to the Black Country and strong transport links via the M54/A5 corridor, A41 corridor and a railway station on the Shrewsbury to Wolverhampton line.

The site is also of a sufficient scale to accommodate a meaningful proportion of the proposed contribution to the unmet need of the Black Country, should it be identified as a proposed allocation”.

3.50 With regard to the conclusions of the Green Belt Assessment, the application that has been submitted to the Council includes a detailed Green Belt Assessment, which demonstrates that development of the site, with regard to Green Belt Harm will be low-moderate and indeed, that with the mitigation proposed through the retention and enhancement of existing boundary features, the use of strategic buffers and a significant overprovision of green infrastructure, release of land from the Green Belt in this location, along with development of the site, would have materially lower Green Belt impacts than the sites identified by the Council for allocation and those listed above within this report.

3.51 In addition to the Green Belt Assessment, the application is supported by a detailed suite of technical reports, including a Heritage and Archaeological Statement, a Flood Risk Assessment and Drainage Strategy and Ecological Assessments. These reports demonstrate that the concerns raised by the Council within the SA relating to archaeology, flooding, BMV and ecology are unsubstantiated and that there is indeed, no technical impediment to development coming forward in this location.

3.52 The SA significantly notes that the sites is strategically located adjacent to the Black Country from where the unmet housing needs are arising and



- has excellent transport links, including sustainable transport connections whereby residents could freely move to and from the Black Country without giving rise to unsustainable transport/commuting movements.
- 3.53 The SA further indicates that the site is suitable for safeguarding. Boningale Homes do not consider it appropriate to safeguard the site, but consider that the site should be allocated as part of this Plan, but note that in stating that the site is suitable for safeguarding, the Council clearly consider that the site is suitable for Greeb Belt release and allocation for development at some point.
- 3.54 Whilst it is noted that the SA fails to note that the site is owned and is actively being promoted for residential-led development, and states that it is unclear if the site is available, the site is controlled by a well respected and known housebuilder developer, who is actively in the process of building out a site within Albrighton at present. Boningale Homes are committed to seeing the site come forward for residential development and are further committed to delivering the wider infrastructure and improvements needed, not just to support development of the site in question, but to support the continued growth and long-term vitality and vibrancy of Albrighton for current and future developments.
- 3.55 Allocation of the site for up to 800 dwellings would make a significant contribution to meeting the 1,500 dwellings unmet need from the Black Country in the single most sustainable location to do so.
- 3.56 We consider, aligned with the above, that without the allocation of additional land and specifically, without the allocation of the the most suitable alternative, Albrighton South, the Council simply cannot demonstrate that they have a sound Plan that is capable of being delivered over what is left of the emerging Plan period.



4. GC45: Housing and Employment Topic Paper

- 4.1 The element of the representations prepared on behalf of Boningale Homes should be read in the context of an overall support for the growth higher growth scenario, along with accommodating unmet need from the Black Country.
- 4.2 We do however note the significant and growing unmet need and refer the Council to recent Full Council reports prepared by Wolverhampton City Council which indicate far more significant unmet need issues than had been previously met. It therefore is reasonable to assume that additional needs from the Black Country will need to be addressed in this Plan or indeed in future iterations of the Plan and where the Council may wish to accommodate unmet employment needs so as to continue to see significant growth in the Shropshire economy, it will be necessary to ensure that this marries with the provision of housing in the Council area. Further, the Council should have regard to the social and economic benefits associated with housing-led growth, particularly that, which can deliver wider infrastructure and employment opportunities.
- 4.3 Within paragraph 13 of ID28, the Planning Inspectors specified that *“the Council’s intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire’s housing need to meet some of this externally derived unmet need.”*
- 4.4 The proposed housing requirement is therefore a minimum of 31,300 dwellings between 2016 and 2038, which equates to an annual average of around 1,423 dwellings.
- 4.5 This represents:
- a) A continuation of the ‘High Growth’ option for the housing requirement previously identified and contained in the submission version of the draft Shropshire Local Plan (15% uplift to local housing need);



- b) An uplift of 500 dwellings on the housing requirement proposed in the submission version of the Plan; and
- c) A continuation of the specific contribution of 1,500 dwellings towards the unmet housing need forecast to arise in the Black Country proposed within the submission version of the draft Shropshire Local Plan. This is however now achieved through a further specific uplift of 1,500 dwellings, rather than having these dwellings 'blended' into the housing requirement as proposed in the submission version of the Local Plan.

National Planning Policy Framework (NPPF, 2023)

- 4.6 At paragraph 11, the NPPF states how *"Plans and decisions should apply a presumption in favour of sustainable development."*
- 4.7 Paragraph 11 moves on to state *"For plan-making this means that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas."* (our emphasis)
- 4.8 Furthermore paragraph 35 a) states that Local Plans are 'sound' if they are *"positively prepared", i.e., "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development."* (our emphasis)
- 4.9 These policies make it clear that meeting objectively assessed needs is the minimum expectation of a Local Plan.
- 4.10 What this means for housing need is explained in section 5 of the NPPF, 'Delivering a sufficient supply of homes'.
- 4.11 Under this heading, paragraph 60 of the NPPF states, *"The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community."* (our emphasis)
- 4.12 Paragraph 61 moves on to state how the minimum number of homes needed in an area should be determined. It states *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance."*



- 4.13 However paragraph 61 moves on to state *“The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals.”* (our emphasis)
- 4.14 Furthermore in respect of neighbouring areas which may not be able to meet their own need, paragraph 61 states *“In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”* (our emphasis)
- 4.15 It is therefore clear that the assessment of need in any given area should include unmet need from neighbouring local authorities if it exists.
- 4.16 Whilst the Shropshire Local Plan is being examined under previous iterations of the NPPF, it is pertinent to note that the December 2023 NPPF also introduces the link between economic growth aspirations and housing need, paragraph 67 stating *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”* (our emphasis)
- 4.17 This is also reflected in section 6 of the NPPF, ‘Building a strong, competitive economy’ and specifically in paragraph 86 c) which states that planning policies should *“seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.”*
- 4.18 These policies relating to housing need are then addressed in more detail in the ‘Housing and Economic Needs Assessment’ (HENA) section of the Planning Practice Guidance (PPG) which is discussed below.



Planning Practice Guidance (PPG)

- 4.19 The method by which housing need should be established, and an explanation of the ‘Standard Method’ (SM) referred to in the NPPF is set out in detail in the HENA section of PPG (section ID2a).
- 4.20 At the outset the PPG states, “*Housing need is an unconstrained assessment of the number of homes needed in an area*” and goes on to state “*Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.*”¹ (Our emphasis).
- 4.21 The PPG is very clear that the assessment of need should be unconstrained and is an entirely separate exercise from establishing the housing requirement.
- 4.22 The PPG then moves on to explain what the SM provides. It states “*The standard method uses a formula to identify the minimum number of homes expected to be planned for. The standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure.*”² (Our emphasis).
- 4.23 This section emphasises how the SM provides the minimum housing need figure and highlights how the SM does not produce a housing requirement figure. A separate part of PPG addresses housing requirement.
- 4.24 The PPG also makes a very clear distinction as to the tests which will be applied if local authorities seek to justify housing need higher or lower than the SM minimum.
- 4.25 In respect of a housing need figure lower than the standard method minimum, the PPG states “*where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.*”³ (Our emphasis).

¹ Paragraph ID:2a-001, PPG, 2019

² Paragraph ID:2a-001, PPG, 2019

³ Paragraph ID:2a-015, PPG, 2019



- 4.26 In contrast, in terms of establishing housing need which is above the Standard Method, PPG states “Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”⁴ (Our emphasis).
- 4.27 Having established that SM represents minimum need, and that actual housing need may be higher, the PPG moves to discuss when it might be appropriate to plan for a higher housing need figure than the SM indicates.
- 4.28 PPG therefore states that “there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”⁵ (Our emphasis)
- 4.29 In discussing these circumstances PPG reiterates how the standard method only represents minimum need, stating “The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.”⁶ (Our emphasis)
- 4.30 The PPG then moves on to discuss what circumstances might lead to an increase in housing need, but confirms at the outset that the circumstances it refers to are not exhaustive and there may be other reasons as to why overall housing need exceeds the Standard Method’s minimum calculation:

“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- **growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);**
- **strategic infrastructure improvements that are likely to drive**

⁴ Paragraph ID:2a-015, PPG, 2019

⁵ Paragraph ID:2a-010, PPG, 2019

⁶ Paragraph ID:2a-010, PPG, 2019



an increase in the homes needed locally; o

- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;
- There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more homes. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”⁷

- 4.31 The PPG also reiterates that this assessment of need is separate to the process of establishing a housing requirement, stating that the circumstances which may lead to a higher need figure “*will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan)*”⁸ (Our emphasis).
- 4.32 The delivery of much needed affordable housing can also have an impact on the assessment of overall need. In this respect the Planning Practice Guidance (PPG) states “*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*”⁹
- 4.33 Therefore, aligned with our comments set out in Chapter 3 and aligned with the principles set out in the NPPF and PPG listed above, Boningale Homes support the approach being taken to the identified housing requirement and consider that the approach being taken to adopting the higher growth scenario and unmet housing need from the Black Country is justified and demonstrates that the Council are committed to ensure that Shropshire continues to be a place that people wish to work and live..

⁷ Ibid

⁸ Paragraph ID:2a-010, PPG, 2019

⁹ Paragraph ID2a:024, PPG, 2019



- 4.34 Further, the approach being taken will ensure that the Council benefit significantly from the socio-economic benefits associated with housing growth, including retained local spend, new homes bonuses, Council tax returns, the creation of direct and in-direct short-term and long-term jobs and wider support with delivery the infrastructure, such as schools and health care facilities, that given current national funding opportunities, would simply not be deliverable and as such of benefit to residents of Shropshire.
- 4.35 In summary, we consider that the approach taken is justified, reasonable and is sound.



5. GC46: Updated Green Belt Topic Paper

- 1.1 Paragraph 6.5 of the Updated Green Belt Topic Paper States
- “Having reflected on the proposed spatial strategy, the strategic role of the settlement, known development constraints, identified issues and opportunities, and having reviewed the site promotions received within the settlement, the draft Shropshire Local Plan proposes that in Albrighton:*
- a. New residential development will primarily be delivered through existing commitments (including the proposed ‘saved’ SAMDev Plan allocations which now either benefit from Planning Permission or are subject to a current Planning Application) and a further residential allocation (ALB017 & ALB021), consisting of the remaining safeguarded land to the east of the settlement. This will be complemented by any appropriate small-scale windfall residential development within the Albrighton development boundary and appropriate exception development.*
- b. New employment development will primarily be delivered at the nearby RAF Cosford major developed site. This will be complemented by appropriate small-scale windfall employment development within the Albrighton development boundary shown on the draft Policies Map, where it is consistent with relevant policies of the Local Plan.*
- As such, for the avoidance of doubt, no land is proposed to be removed from the Green Belt at Albrighton in order to achieve the proposed settlement strategy for the settlement or the proposed spatial strategy.”*
- 1.2 Accordingly, the updated Green Belt Topic Paper does not consider or seek to review the assessment previously made in respect of the land at Albrighton South.
- 1.3 Aligned with the above, and the supporting Green Belt Assessment prepared in support of the Albrighton South application, we have concerns about inconsistencies in the approach taken by the Council previously and suggest that it is appropriate and fundamentally necessary for the Council to consider the release of land from the Green Belt in Albrighton.



6. Conclusions

- 1.1 These representations have been prepared on behalf of Boningale Homes.
- 1.2 Boningale Homes are a respected Shropshire based housebuilder who have and continue to contribute to the wider Shropshire economy.
- 1.3 Boningale Homes are fundamentally supportive of Shropshire Council getting a Local Plan adopted, particularly noting the time and financial pressures faced in getting as far as the Council currently are. Failure to adopt a sound Plan at this point, given the resource and effort to get to Examination in Public would be harmful and problematic for the Council and would doubtless lead to a number of speculative, uncontrolled applications for development that almost certainly won't deliver the infrastructure and affordable housing required to 2038.
- 1.4 The representations provide a response to the additional and updated evidence base documents prepared following the interim comments from the Inspectors and should be read in the context of support for the Local Plan,
- 1.5 We are supportive and consider that the approach taken to identifying and justifying the proposed housing target is appropriate and demonstrates proactive and best practice planning.
- 1.6 However, we are concerned with the approach being taken to meeting the 1,500 dwellings unmet housing needs from the Black Country.
- 1.7 The Council should seek to allocate additional land, as close to the Black Country as possible and should ensure that where possible the land allocated can make a significant infrastructure and affordable housing contribution.
- 1.8 Boningale Homes are promoting land at Albrighton South, which lies as close to the Black Country as is possible within the Shropshire boundary and with excellent road and public transport connections.
- 1.9 The Council have identified that this site is suitable for safeguarding within the latest SA and we consider that without allocating the site, the Council simply cannot deliver a sound Local Plan.
- 1.10 The site is supported by a recently submitted planning application, which includes a full suite of supporting technical reports demonstrating the



development potential.

- 1.11 Boningale Homes formally request to participate in the Examination hearing sessions moving forward.



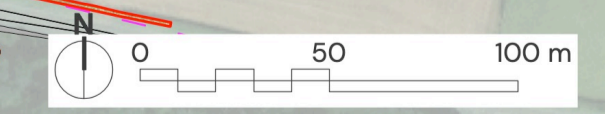
KEY			
	Application boundary		Proposed feature tree
	Existing vegetation - Pink dashed line indicates root protection area - As per Tree Retention Plan by FPCR (ref 12322-T-01)		Proposed native tree
	Existing vegetation to be removed		Proposed street tree
	Existing contours - major (dark grey) and minor (light grey)		Proposed orchard tree
	Proposed residential built form		Proposed native tree belt with native shrub understorey
	Proposed spine road		Proposed native hedgerow
	Proposed secondary street		Proposed wet tolerant native shrub
	Proposed tertiary street		Proposed ornamental shrub
	Proposed shared surface / private drives		Proposed marginal planting
	Proposed pedestrian footpath		Proposed amenity grass
	Proposed NEAP		Proposed wildflower meadow
	Proposed informal play opportunity		Proposed tussocky meadow
	Proposed public art opportunity - variety of features responding to their surrounding context		Proposed wet-tolerant meadow to SuDS basins



LAND AT PATSHULL ROAD, ALBRIGHTON – ILLUSTRATIVE LANDSCAPE MASTERPLAN

PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: IBD | APPROVED BY: AMS | DATE: 15/05/2024 | SCALE: 1:2000@A1 | DRWG: P24_0225_EN_009 | CLIENT: BONINGALE HOMES LTD |

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