

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	Matt Lakin, Co Chair, Albrighton Village Action Group
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	X
c. Updated Housing and Employment Topic Paper.	X
d. Updated Green Belt Topic Paper.	X

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	<p>Shropshire Local Plan - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report</p> <ul style="list-style-type: none"> ● Paragraphs 12 ● Paragraph 12.23 ● Tables 12.1 and 12.2 ● Table 12.3 page 267/8 ● Table 12.4 ● Paragraphs 13 ● Paragraph 13.46 ● Paragraph 13.54 ● Additional Sustainability Appraisal Report Appendix 3; Updated Stage 3 Site Assessment <p>Shropshire Local Plan - Updated Housing and Employment Topic Paper</p> <ul style="list-style-type: none"> ● Paragraph 7.63 and 7.64 ● Table 8.1 ● Table 8.2 ● Table 8.3 ● Paragraphs 8.73h, 8.84, 16.64 ● Paragraphs 16.64 ● Paragraph 16.65 <p>Shropshire Local Plan - Updated Green Belt Topic Paper</p> <ul style="list-style-type: none"> ● Paragraphs 2.1 - 2.12 ● Paragraph 4.7 - 4.10 ● Paragraph 4.14 ● Paragraphs 4.15 to 4.21 ● Table 4.1 ● Paragraph 5.3b ● Paragraph 5.8 ● Paragraph 5.16
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- Paragraph 5.24
- Paragraph 5.25
- Paragraphs 5.23 – 5.27
- Paragraph 6.1
- Paragraph 6.4
- Paragraph 6.5a
- Paragraph 6.5b
- Paragraph 6.6
- Paragraph 6.7 & 6.8
- Paragraphs 6.5 – 6.8
- Paragraph 6.13
- Paragraphs 6.19d

Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

Introduction: Albrighton Village Action Group is a community group formed by and for the residents of Albrighton village in response to Boningale Homes over-development proposals to to build over 800 houses, a supermarket, drive through, park and ride etc on 56 hectares of Green Belt south of our village - on land that is not allocated for any development of any kind in the Shropshire Local Plan. Their proposals would increase the footprint of the village by 62% in an area that is completely disconnected from the High Street.

Our interest in the draft Local Plan: We have reviewed the Planning Inspectorate's queries and the additional material produced by Shropshire Council; and are pleased to see that Shropshire Council has clearly undertaken detailed, rigorous and extensive additional assessment work to produce the updated Local Plan Material.

This work has been produced in good faith by Shropshire Council on behalf of the residents of the County. We believe that it provides clear evidence that Shropshire Council has met the detailed requirements of the Planning Inspectorate; and delivers the principle and overriding spirit and intent of their requests.

Based on this we urge the Planning Inspectorate to approve the adoption of the Shropshire Local Plan without further delay.

Our detailed comments on the consultation documents are provided below:

Shropshire Local Plan - Additional Sustainability Appraisal Report

- Paragraphs 12: shows that a comprehensive updated SA assessment was undertaken on options for housing and employment land; covering sites within all Shropshire Place Plan areas and strategic settlements; not limited to sites proposed for allocation in the draft Local Plan (12.46)
- Paragraph 12.23; by percentage more people migrate from Albrighton to the Black Country (10.6%) than from the Black Country to Albrighton (8.7%). This shows that the net % migration is from Albrighton to the Black Country; and supports the case that there is no requirement for any additional housing in Albrighton to contribute to the unmet needs forecast from the Black Country; refer to below
- Tables 12.1 and 12.2 (pages 246 to 265) clearly demonstrates that a detailed and comprehensive updated Stage 2a Housing Sustainability Appraisal Site Assessment review of all sites in Shropshire has been undertaken (included in Appendix 1)
- Table 12.3 page 267/8- The methodology used to undertake the above assessments appears to be comprehensive and sound and we concur with the findings that Tasley, Shrewsbury and Ironbridge and are the most suitable areas in which to accommodate the proposed housing contributions to unmet needs forecast to arise in the Black Country.
- Table 12.4: We agree that ALB017 (Wain Estates) & ALB021 (East of Wain Estates) are suitable as proposed housing allocation to meet the medium term housing needs of Albrighton
- We fully agree that Albrighton is not suitable to contribute any additional housing to accommodate the proposed housing contributions to unmet needs forecast to arise in the Black Country.
- Furthermore no additional housing sites should be released from Green Belt in or around Albrighton; except those that are already included in the draft Local Plan for development or safeguarded for development after 2038.
- Paragraphs 13 show that a comprehensive assessment of the options for the strategic distribution of planned development has been undertaken independent of the sites assessment; Option A: Rural rebalance; Option B: Urban Focus; Option C: Balanced Growth.
- We concur with Paragraph 13.46 that Option B: Urban Focus would have a strongly positive effect and it would also be the most sustainable of the three options (13.54). This reinforces the point that Albrighton village (not urban) is not suitable for additional development beyond that which is included in the Shropshire Local Plan.
- Additional Sustainability Appraisal Report Appendix 3; Updated Stage 3 Site Assessment for Albrighton shows that a further comprehensive assessment of sites P36A and P36B has been undertaken beyond the initial Stage 2A reviews. We fully agree with the recommendations and reasoning summarised in the Stage 3 assessments that sites P36A and P36B should NOT be built on:
 - The sites P36A and P36B are not suitable for allocation for housing or even for windfall housing and that they should both be retained as Green Belt
 - The sites P36A and P36B perform against the Green Belt purpose as follows:
 - Moderately against Purpose 3 (safeguarding countryside from encroachment)
 - Strongly against Purpose 4 (preserving setting/character of historic towns)
 - Note that since the Stage 3 assessment was undertaken the train links at Albrighton Railway station have worsened significantly. Journey times from Albrighton to Wolverhampton, Birmingham and Shrewsbury are longer than when the review was undertaken, there are less trains and there is also no longer a direct regular connection to Smethwick Galton Bridge. This means that with P36A and P36B being a significant distance from Albrighton

- Station; the relationship to Black Country and sustainable transport links have now deteriorated significantly further
- Safeguarded land is [already] available to meet settlement development requirements in Albrighton, along with windfall, infill and exception site opportunities.
 - Development could impact on settings of Grade II listed Lea Hall and Boningale Conservation Area.
 - The Sites P36A and P36B would substantially reduce spatial separation between Albrighton and Boningale.
 - The sites P36A and P36B are considered to be located within a sensitive Green Belt parcel, the release of which would have high harm.
 - The sites P36A and P36B are poorly related to the built form of the settlement.
 - Note that the sites are on Very Good (Grade 2) and Good (Grade 3) farmland according to the Natural England Land Classification Map ALC004 <https://publications.naturalengland.org.uk/publication/130044>
 - Whilst the sites P36A and P36B 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 not in Albrighton upon which to accommodate these proposed contributions; these are in Tasley, Shrewsbury and the former Ironbridge power station
 - 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

Shropshire Local Plan - Housing and Employment Topic Paper

- Paragraph 7.63 and 7.64; we agree that it is beneficial for Shropshire to increase the housing requirement by 500 to total 31,300 dwellings up to 2038. We support this as it is proposed to be undertaken in an appropriate manner whilst providing a sustainable increase in housing in Shropshire. We strongly believe that this should be a key factor which the Planning Inspectorate should take into consideration and approve the adoption of the Shropshire Local Plan.
- Table 8.1 shows that the Draft Local Plan Proposed Guideline (2016-2038) allocations for Albrighton are well planned and sufficient at 500
- Albrighton are actually already sustainably delivering more houses than in Table 8.1. The existing phased building allocations are as follows:
 - Millfield Phases I to IV = 257 houses
 - ALB017 (Wain Estates) = 150 houses
 - ALB021 (East of Wain Estates) = 30 houses
 - ALB0XX (Whiteacres) = 24 houses
 - Windfall Allowance = 48

Total = 509 houses
- Table 8.2 shows that the net density of housing proposed in Albrighton is 39. This a very high density compared to all the other 69 proposed allocation sites in Shropshire; it is in the 94% percentile and is joint 4th out of the 69 proposed residential allocation sites in Shropshire. This clearly shows that Albrighton is already delivering more than its fair share of housing allocations for Shropshire; not considering the additional housing which will be provided in the future beyond 2038 by the proposed safeguarded sites

- Table 8.3 Shows that the proposed 180 dwellings included in ALB017 & ALB021 are forecast to be delivered steadily and sustainably over years 1 to 10 (from 1st April 2023). We agree that given that the density of houses is comparatively significantly higher than other Shropshire sites; it is right that there should be less development in Albrighton forecast between 2033-2038.
- Paragraphs 8.73h, 8.84, 16.64; These confirm that Albrighton is surrounded by Green Belt, which is a relevant constraint to further windfall development opportunities. This is a very important point which we strongly agree with. These are key constraints around Albrighton to stop developments which are in Green Belt and are not planned in line with the Shropshire Local Plan
- Paragraphs 16.64 confirms the following. We fully agree that Albrighton is not suitable to accommodate additional employment development and that safeguarded land should be allocated in its entirety for housing needs of Albrighton.
 - a. Within the existing defined development boundary it is considered only small-scale windfall opportunities exist. Whilst sites that could deliver some small scale infill development have been identified, it is not considered that they are suitable to accommodate employment development of a type to accommodate the proposed employment land contribution to the Black Country. Such sites are also intended to support the achievement of the proposed strategy for Albrighton.
 - b. Whilst the settlement currently has safeguarded land, the draft Local Plan proposes to allocate this in its entirety for residential development to meet the housing needs of Albrighton and its hinterland. This development is intended to redress previous low housing completion rates, which has been assessed to be a higher priority requirement than employment delivery in this location (as summarised in paragraph 5.15 of EV051).
- Paragraph 16.65; we fully agree that Albrighton is not considered a suitable location to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country. If any speculative developments come forward which propose this then they should be rejected by the planning authorities.

Shropshire Local Plan - Updated Green Belt Topic Paper

- Paragraphs 2.1 - 2.12 show that Shropshire Council has rigorously reviewed the Planning Inspectors requests for further information and undertaken extensive additional work to satisfactorily close out the concerns about soundness about its Green Belt Topic Paper.
In doing this; Shropshire Council have clearly demonstrated a sound and appropriate assessment of the exceptional circumstances for releasing Green Belt land for both Shropshire Council's needs and separately to release land to meet the unmet needs of the Black Country. Furthermore we believe that this demonstrates that this is in compliance with the National Planning Policy Framework (NPPF); and should therefore be accepted by the Planning Inspectorate.
- Paragraph 4.7 - 4.10. In including specific contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise in the Black Country, we concur that the proposed spatial strategy should continue to be underpinned by the principles of 'high growth' and 'urban focus' with the majority of development directed towards urban areas; not villages such as Albrighton which are surrounded by Green Belt.
- Paragraph 4.14; we agree that the starting point for determining the levels of development within settlements should be the proposed spatial strategy. It should not be determined by ad hoc housing and employment proposals by developers who may be motivated by the profit and business growth which could be generated by destroying Green Belt farming land and building housing and employment buildings.

- Paragraphs 4.15 to 4.21 and Table 4.1; Shropshire Council's additional assessment to identify the sites to accommodate proposed contributions to unmet needs forecast to arise in the Black Country is comprehensive and sound.
We agree with the location of and method used to determine the 3 sites for Black Country housing Contribution; in Tasley, Shrewsbury and the former Ironbridge Power Station.
We would prefer for there to be no Green Belt release at all; however we feel that it is reasonable for only one of the sites to require Green Belt release; east of Shifnal Industrial Estate for employment land
- Paragraph 5.3b; we agree that it is important to protect the openness of the Green Belt surrounding RAF Cosford from potential harm. For example if proposals were put forward for housing or employment sites by developers on unallocated Green Belt around Albrighton or Cosford; these would lead to significant harm to the character, openness and benefit of Green Belt; and should therefore be protected by the planning process.
- Paragraph 5.8; only 2 sites of the 14 sites proposed to be removed from the Green Belt area for residential or residential-led mixed use development. We agree that this is a very limited number of sites and believe that it is important for the character of Shropshire and wellbeing of its residents that this number is not increased by any other future developments.
- Paragraph 5.16 states that NPPF Paragraph 140 states that "...where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through nonstrategic policies, including neighbourhood plans." We agree that it is critical that public policies should be used to decide where Green Belt boundaries should be changed. The boundaries should not be changed in response to speculative proposals for housing or employment sites by Developers when they are not included in public policy documents such as the Local Plan or neighbourhood plan.
- Paragraph 5.24; we agree that the safeguarded land in Albrighton is not allocated for development within the draft Shropshire Local Plan, rather it is removed from the Green Belt and 'safeguarded' from development, so that it can provide future development opportunities beyond the time period addressed within the draft Shropshire Local Plan e.g beyond 2038.
- Paragraph 5.25; furthermore we agree that; consistent with paragraph 143(d) of the NPPF, "planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development". In effect safeguarded land should only be developed once allocated for development within a future Local Plan.
- We believe that Paragraphs 5.24 & 5.25 are critical to ensure a long term sustainable supply of development land for communities and that it is vital that these safeguarded sites are not developed early. For example; if any speculative developers come forward to develop these sites early; then these should be rejected in principle unless Paragraphs 5.24 and 5.25 are fulfilled. Development should be sustainable and at a pace which maintains community cohesion in Albrighton and maintains the character and integrity of the village.
- Paragraphs 5.23 – 5.27. There appears to be an automatic assumption by some developers that "safeguarded" land is safeguarded for future development, contrary to the conditions set out where it is clear that the land is safeguarded from development as and until future development opportunities beyond the time period are addressed within the draft Shropshire Local Plan. We believe that Local Authorities and the Planning Inspectorate should make it very clear that this is the

case and that developers should respect this; and any proposals in Safeguarded land should be rejected on principle until the right time comes.

- Paragraph 6.1 we concur that Albrighton is a large village; it is not a town. If any speculative developers come forward with proposals which describe Albrighton as a Town; then this demonstrates that they do not understand the community or its' needs and are out of sync with the nature and location of the village within the Green Belt
- Paragraph 6.4; we agree that respecting Albrighton's location in the Green Belt is a vital part of the proposed long term sustainable settlement strategy. If any speculative housing proposals are submitted for the Green Belt surrounding the village these should be rejected outright as they do not respect this key element and risk the long term sustainability of the village
- Paragraph 6.5a; we agree that new residential development in Albrighton should primarily be delivered through existing commitments and further allocations on ALB017 & ALB021, with appropriate small-scale windfall residential developments.
- Paragraph 6.5b; we agree that new employment development should primarily be delivered at the nearby RAF Cosford major developed site; complemented by appropriate small-scale windfall employment development. The village is not suitable for larger scale additional employment development for a number of reasons including traffic, parking, public transport etc.
- Paragraph 6.6; we concur that no land should be removed from the Green Belt at Albrighton in order to achieve the proposed settlement strategy within the draft Local Plan. Any speculative developments which come forward in the Green Belt around the village should be rejected in principle.
- Paragraph 6.7 & 6.8; we agree that it is appropriate in order to extend the supply of safeguarded land for sustainable future development in the village, for 3 areas of land totalling some 19.9ha to be proposed to be removed from the Green Belt and 'safeguarded' for future development (ALB014, P32a and part of P35)
- Paragraphs 6.5 – 6.8. It is important for there to be a clear, phased development strategy for Albrighton in order to ensure that the village does not become overwhelmed and lose much of its character and community cohesion. These paragraphs represent a pragmatic approach to and we would concur that new residential development in Albrighton is primarily delivered through existing commitments and a further residential allocation at ALB017 & ALB021. To support a sustainable pattern of future growth in Albrighton beyond 2038 we support the safeguarding of land ALB014, P32a and part of P35 for future development.

We agree that outside these identified areas there is no requirement for additional Green Belt release.

We support the rationale for the proposed green belt release to support a sustainable pattern of future growth in the County to 2038 and beyond as set out in Section 5: <https://www.shropshire.gov.uk/media/20520/green-belt-revised-exceptional-circumstances-statement-december-2020-ev051.pdf>. Section 5.31 sets out the key considerations for each site (ALB014, P32a and part of P35). Importantly 5.65 states that the Green Belt release proposed at Albrighton is specifically for safeguarded land to meet the longer-term development needs of the settlement beyond the Local Plan Review period. By inference, therefore, the land at Site Ref (P36A and P36B) <https://www.shropshire.gov.uk/media/7268/shropshire-council-green-belt-assessment-figures-4-1-to-4-5.pdf> is not proposed for release and nor would we support its release if any speculative developments come forward. Any developments on this site should be rejected for these reasons.

- Paragraph 6.13; we agree that there are more appropriate locations and sites upon which to accommodate proposed contributions to the unmet needs forecast to arise within the Black Country. If any housing proposals are put forward which promote

Albrighton as somewhere to contribute to the unmet Black Country needs forecast; then these should clearly be rejected.

- Paragraphs 6.19d we agree that “when defining Green Belt boundaries, plans should... e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period” and that this can only be achieved by identifying safeguarded land for future development beyond the proposed plan period at the settlement.

As a result we concur that once the draft Local Plan is adopted and proposed land is safeguarded; then these Green Belt boundaries should remain in place for long-term and should not need to be altered at the end of the next plan period. Based on this any further development housing or employment proposals which are put forward by speculative developers in the future on land which is not allocation or safeguarded should be rejected in principle.

We also understand that some developers (such as Boningale Homes) and house building organisations are arguing that it is not safe, legal or correct that Shropshire Council’s Local Plan is proposing to increase the density on already allocated sites in order to increase it’s housing numbers; especially in the sites that are proposed to meet the Black Country need.

We believe that this argument is not factually correct and demonstrates the profit driven, straw clutching greed of these house building organisations. We understand that in fact, the increased number of houses is based on factual evidence of the amount of windfall development in the county; and also that the increased number of houses on sites for the Black Country need is based on the actual number of houses in planning applications; therefore increasing the accuracy of the original assessment. Please ensure that this is taken into account when dismissing any objections to the Local Plan by commercially driven housing developers.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

No, I do not wish to/consider it necessary to participate in hearing session(s)

Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.