

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:	S.Jarvis - Albrighton and District Civic Society
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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.	<input checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

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

Paragraph(s):	Paragraphs 12 Paragraph 12.23 Tables 12.1 and 12.2 Table 12.3 page 267/8 Table 12.4 Paragraph 13.46 Paragraph 13.54 Additional Sustainability Appraisal Report Appendix 3; Updated Stage 3 Site Assessment
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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.

<p>Albrighton and District Civic Society (ADCS) is a voluntary group and part of the national civic society movement. Its aim is to improve the appearance of our villages (Albrighton, Boningale, Donington-with-Boscobel and Tong) and the quality of life within in them.</p> <p>ADCS members have reviewed the Planning Inspectorate's queries and the additional material produced by Shropshire Council. It's clear that the Council has undertaken detailed, rigorous and extensive additional assessment work to produce the updated LP material.</p> <p>Tables 12.1 and 12.2 (pages 246 to 265) demonstrate that a comprehensive updated Stage 2a Housing Sustainability Appraisal Site Assessment review of all sites in Shropshire has been undertaken (included in Appendix 1)</p> <p>Table 12.3 page 267/8. The methodology used to undertake the assessments appears to be sound. ADCS support the findings that Tasley, Shrewsbury and Ironbridge and are the most appropriate areas</p>

in which to accommodate the proposed housing contributions to the unmet needs forecast to arise in the Black Country.

Table 12.4. We agree that sites ALB017 and ALB021 are suitable as proposed housing allocation to meet the medium term housing needs of Albrighton. We also concur that Albrighton is not suitable to contribute any additional housing to accommodate the unmet needs forecast to arise in the Black Country. We would agree that no additional housing sites should be released from Green Belt in or around Albrighton except those that are already included in the draft LP for development or safeguarded for development after 2038.

We concur with Paragraph 13.46 that Option B Urban Focus would have a positive effect and it would also be the most sustainable of the three options at 13.54. Albrighton village (not urban) is not suitable for additional development beyond that which is included in the Shropshire LP.

Additional Sustainability Appraisal Report Appendix 3. The 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. ADCS support the recommendations that sites P36A and P36B should not be developed. The sites should both be retained as Green Belt performing:

* Moderately against Purpose 3 in safeguarding the countryside from encroachment.

* Strongly against Purpose 4 in preserving the setting and character of historic towns i.e. Albrighton.

(Please continue on a separate sheet if necessary)

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

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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)

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

Paragraph(s):	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
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Paragraph 7.63 and 7.64. We support the increase in housing requirement by 500 to total 31,300 dwellings up to 2038 if this is undertaken in an appropriate and sustainable manner.

Table 8.1 shows that the Draft Local Plan Proposed Guideline (2016-2038) allocations for Albrighton are well planned and sufficient at 500. However, more housing is planned to be delivered in Albrighton than shown in Table 8.1:

- * Millfield Phases I to IV = 257 houses
- * ALB017 (Wain Estates) = 150 houses
- * ALB021 (East of Wain Estates) = 30 houses
- * ALB0?? (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 high density that indicates that Albrighton is already delivering more than its share of housing allocations for Shropshire.

Table 8.3 shows that the proposed 180 dwellings included in sites ALB017 and ALB021 are forecast to be delivered steadily and sustainably over years 1 to 10 (from 1 April 2023). The density of houses is higher than other Shropshire sites and it's right that there should be less development in Albrighton between 2033-2038.

Paragraphs 8.73h, 8.84, 16.64. Albrighton is surrounded by Green Belt, a relevant constraint to further windfall development opportunities. No development should take place in Green Belt that is not planned in the Shropshire LP.

Paragraphs 16.64. ADCS consider that Albrighton is not suitable to accommodate additional employment development. Any safeguarded land should be allocated in its entirety for the residential needs of Albrighton. However, although small scale windfall opportunities exist they are not suitable to accommodate the scale of the proposed employment land contribution to the Black Country.

Paragraph 16.65. Finally, we 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.

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

Paragraph(s):	Paragraphs 2.1 - 2.12 Paragraph 4.7 - 4.10 Paragraph 4.14 Paragraphs 4.15 to 4.21 Table 5.1 Paragraph 5.3b Paragraph 5.16 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 & 6.19d
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Paragraphs 2.1 - 2.12. ADCS believe that the Council has appropriately reviewed the Planning Inspectors request for further information. The Council have also demonstrated a sound assessment of the exceptional circumstances for releasing Green Belt land for both Shropshire's needs and, separately, to release land to meet the unmet needs of the Black Country. ADCS think that this complies with the NPPF.

Paragraph 4.7 - 4.10. ADCS agree 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.

Paragraph 4.14. We agree that the starting point for determining the levels of development within settlements should be the proposed spatial strategy.

Paragraphs 4.15 to 4.21. The Council's comprehensive additional assessment to identify the sites to accommodate proposed contributions to the unmet needs forecast to arise in the Black Country is sound. We agree with the location of, and the method used to determine that the 3 sites for Black Country housing contribution are in Tasley, Shrewsbury and the former Ironbridge Power Station. Whilst we would prefer for there to be no Green Belt release at all, however it would appear reasonable to limit Green Belt release east of Shifnal Industrial Estate for 30ha of employment land.

Table 5.1. For clarity we think that the table should name/site ref all sites.

Paragraph 5.3b. ADCS agree that it is important to protect the openness of the Green Belt surrounding RAF Cosford (and also Albrighton) from potential harm from development on undeveloped land and should be protected by the planning process.

Paragraph 5.16. ADCS agree that public policies should be used to decide where Green Belt boundaries should be changed and only after the exceptional circumstances have been evidenced and are in the public domain such as the LP or neighbourhood plans.

Paragraph 5.24. The role of safeguarded land (in Albrighton) is not widely understood. To ensure a longer-term sustainable supply of development land ADCS recommended that each safeguarded site remains embargoed to development within the timeframe of the current LP but with a suggested phased timeframe in a future LP in which each site will be considered for development.

Paragraph 5.25. See our comment above. Safeguarded land should only be developed once allocated for development within a future LP.

Paragraphs 5.23 - 5.27. Some developers seem to think that "safeguarded" land is safeguarded for future development. Providing developers with an indicative timeframe within a future LP when the site may be available for development may remove any doubt and uncertainty for both the community and developers.

Paragraph 6.1. ADCS concur that Albrighton is a large urban village and is not a "Market" town as described in some Shropshire CC publications. It's location and links means that community cohesion is sensitive to both large scale development and also creeping urbanisation along the A41 toward Codsall. Maintaining protection of the Green Belt and phased, sustainable development are key to maintaining the character of the community. We would ask Shropshire Council to engage with Staffordshire Council to

ensure that a Green belt “buffer” is maintained between Albrighton and Cosdall with no release of Green belt permitted.

Paragraph 6.4. See above. ADCS we agree that respecting Albrighton’s location in the Green Belt is a vital part of a long-term, sustainable settlement strategy.

Paragraph 6.5a. The village understand and expect to see the next phased development in Albrighton will be delivered through existing commitments at site refs ALB017 and ALB021, together with some with small-scale windfall residential development.

Paragraph 6.5b. Despite its location and links Albrighton had never attracted large scale employment development other than RAF Cosford. ADCS agree, therefore, that new employment development should continue to be delivered at RAF Cosford.

Paragraph 6.6. No land should be removed from the Green Belt in Albrighton in order to achieve the proposed settlement strategy within the draft LP. Any speculative developments in the Green Belt around the village which comes forward should be rejected in principle.

Paragraph 6.7 & 6.8. We agree that it is appropriate to identify the supply of safeguarded land for phased and 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 at site refs ALB014, P32a and part of P35.

Paragraph 6.5. – 6.8. We recommend that Shropshire Council set out for the community an indicative timeframe within which we can expect development of site refs ALB017 and ALB021 (that will be the draft LP) and the safeguarded land site refs ALB014, P32a and part of P35 (that will be a future LP). By inference there will be no development permitted on the safeguarded land in the current LP. The expectation is, therefore, that there is no requirement for additional Green Belt release.

Paragraph 6.13. ADCS agree with the conclusions that there are more appropriate locations and sites to accommodate the proposed contribution to the unmet needs forecast to arise within the Black Country.

Paragraphs 6.19 and 6.19d. Fully agree with the summary. Once the draft LP is adopted and the proposed land is safeguarded, then the Green Belt boundaries around Albrighton not need be changed at the end of the next plan period.

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