

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:	Turley on behalf of Vistry Homes	
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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 checked="" 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 checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input checked="" type="checkbox"/>

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

Paragraph(s):	Please refer to the submitted Statement of Representations for further detail.
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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.

Please refer to the Statement of Representations submitted for further detail.
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(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.

Shropshire Examination in Public: Draft Shropshire Local Plan additional Topic Papers and Assessments

Representations on behalf of Vistry Homes

May 2024

Turley

Contents

1.	Introduction and background	1
2.	Response to updated EiP evidence base	3
3.	Summary	7
Appendix 1: Turley Falling Even Shorter Report		8
Appendix 2: Regulation 19 Representations		9

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Client

Vistry Homes

Our reference

BOVQ3007

20 May 2024

1. Introduction and background

- 1.1 Turley is instructed by Vistry Homes Limited (Vistry) to represent their interests in relation to Shropshire Council's Examination in Public for the Draft Local Plan 2016 – 2038 (December 2020) (the LP) in the context of 11.7 hectares of land to the west of Albrighton (the site) which Vistry are promoting for residential development.
 - 1.2 The site represents a sustainable and deliverable residential land opportunity for around 218 new market and affordable homes, and public open space.
 - 1.3 These representations consider the soundness of the following additional information submitted to the Examination:
 - Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.
 - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan
 - Updated Housing and Employment Topic Paper
 - Updated Green Belt Topic Paper
 - 1.4 The above documents are considered in accordance with paragraph 35 of the National Planning Policy Framework (NPPF) which requires plans to be positively prepared, justified, effective and consistent with national policy if they are to be found sound.
 - 1.5 As currently drafted, Vistry do not consider the plan to be sound and the remainder of these representations provide commentary on the key concerns with the Plan and sets out ways in which this can be addressed to ensure that the Plan can be found sound.
- Vistry Homes**
- 1.6 The Vistry Group was established in January 2020 following the merger of Bovis Homes Limited, Linden Homes and Galliford Try Partnerships, and in 2022 merged with Countryside Partnerships. With developments across the United Kingdom Vistry Group will be delivering around 24,000 affordable and market homes a year.
 - 1.7 Vistry are promoting land to the west of Albrighton (SLAA Ref. ALB015) for residential development on behalf of the landowner.
 - 1.8 The strategic land team at Vistry Group has a successful track record for promoting sites through the Local Plan preparation process and working in close partnership with Parish Councils, local planning authorities, landowners and the local community to deliver well designed and successful new places.
 - 1.9 Representations have previously been submitted, principally under the trading name of Bovis Homes, to the following consultation stages:
 - Site Allocation and Management of Development Plan (SAMDev)

- Shropshire Local Plan Review – Consultation on Preferred Scale and Distribution of Development (October 2017);
- Strategic Land Availability Assessment (March 2018);
- Shropshire Local Plan Review Consultation on Preferred Strategic Sites (September 2019); and
- Shropshire District Council’s Local Plan Review: Consultation on Pre-submission Draft (Regulation 18); and

1.10 More recently, representations have been made under the trading name of Vistry Group to the Regulation 19 consultation held in February 2021, as well as the submission of hearing statements to Matters 3, 4, 6 and 8 of the EiP in May 2022.

Structure of representations

1.11 The remainder of these representations are separated to align with the additional topic papers submitted which we wish to respond to in turn.

- **Section 2:** Response to updated EiP evidence base
- **Section 3:** Summary

2. Response to updated EiP evidence base

Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.

- 2.1 Vistry Homes support the principle of the proposed additional policy to meet the housing needs of older people and those with a disability or special needs.
- 2.1 This notwithstanding, the content of the policy and specific requirements for specialist housing is considered to be overly prescriptive. Setting out minimum housing requirements may risk providing the wrong type of housing for residents and potentially impact on development viability and delivery. Reference should instead be made to the need to take into consideration the latest housing need assessment evidence at the time of application submission to inform the mix and type of development being proposed, whilst also taking into consideration the location of the site and whether it would be appropriate for specialist housing to be provided there.
- 2.2 As such, the policy should be reconsidered to ensure it accords with paragraph 86 of the NPPF and the need for policies to *“be flexible enough to accommodate needs not anticipated in the plan”* and to *“enable a rapid response to changes in economic circumstances.”*
- 2.3 It also needs to recognise that housing needs vary within different areas and on a site-by-site basis. The policy must ensure that the viability of development is protected whilst providing an appropriate housing mix for the site location and local market.
- 2.4 In addition, where the policy makes reference to specific requirements such as being *“designed to be ‘friendly’ to those with dementia”*, reference should be made to other supporting documents, such as the Dementia Friendly Housing Guide (GC26), to provide guidance for applicants/developers. As worded, the policy is too vague on this point and will lead to uncertainty.
- 2.5 In terms of where this policy will sit within the emerging Plan, it is noted that the draft is labelled *“Appendix 1”*. To ensure clarity for applicants and decision makers going forward, it is suggested that the policy forms part of the main document and not an appendix to the plan and therefore better enables the policies to be read together.

Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan

- 2.6 It is recognised that the updated Sustainability Appraisal (SA) has been undertaken to address the issues arising during the Examination in respect of the Unmet Housing and Employment Land Needs of the Association of Black Country Authorities (ABCA). The Inspector’s have found the Council’s approach to identifying the housing and employment land needs for Shropshire sound, including providing for 1,500 homes and 30ha of employment land over the plan period towards the Black Country unmet need. However, we do not consider the overarching calculation of unmet need to be an accurate representation of the total unmet needs of the Black Country, upon which Shropshire’s contribution is based.

- 2.7 The Black Country need is based on the Strategic Growth Study (2018) which is now considered to be out of date. Whilst the Inspector’s comment that the correspondence with the ABCA demonstrates agreement on the amount of need Shropshire will accommodate in their emerging plan, it is noted that this took place and was agreed pre-examination, which commenced in 2021, circa 3 years ago. We would therefore suggest that Shropshire have adopted a very conservative approach to the unmet needs of the Black Country. Given the passage of time and worsening housing shortfall across the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), and since there are neighbouring authorities revising their approach to the unmet needs of the GBBCHMA (for instance, South Staffordshire District Council, currently undertaking a second Regulation 19 consultation reducing their contributions to the GBBCHMA to just 640 dwellings over the plan period) discussions with neighbouring authorities should be revisited prior to the Stage 2 hearings taking place.
- 2.8 The GBBCHMA Position Statement Addendum (April 2023) updated the third GBBCHMA Position Statement published in September 2020 and provides the supply and shortfall position across the GBBCHMA between 2011 and 2031 as of 31 March 2021. A critique of the most up to date Position Statement is appended to these representations (**Appendix 1**) which concludes that the base data used for the Position Statement is considered to be out of date and therefore does not provide an accurate starting point for considering the shortfall across the HMA, which we consider to be far higher than the 2,053 homes identified by the Addendum.
- 2.9 The Turley “Falling Even Shorter” report (**Appendix 1**) calculates an unmet need across the HMA of 40,676 homes up to 2031 which increases to 79,737 homes up to 2040. It is key that Local Plans make critical decisions and allocate sites for development to provide for these unmet needs. However, the progress of Local Plans across the GBBCHMA has been slow, despite national planning policy requirements to review plans every five years. Since much of the HMA is designated Green Belt and there is a limited supply of brownfield sites, the comprehensive review of the Green Belt and subsequent Green Belt release in appropriate locations, must be prioritised to allow proportionate release to meet the unmet needs identified.
- 2.10 The NPPF (December 2023) paragraph 35a) continues to make clear that for a plan to be considered positively prepared it should provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs. This should be informed by agreement with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- 2.11 The Updated SA concludes that the “*high growth*” option, including a contribution of 1,500 dwellings to the GBBCHMA unmet needs is sustainable. However, this is considered to be disproportionately small given the significant need demonstrated by the “Falling Even Shorter” report and the functional links Shropshire has to the Black Country. There is scope to provide for additional needs in sustainable locations and early in the plan period, on sites such as that off Sandy Lane, Albrighton, to go further in providing a larger proportion of the unmet needs from the GBBCHMA and in locations close to where the need arises. We would therefore encourage the Council to

reengage with neighbouring authorities in addressing this serious housing shortfall and agree an increase in the contribution to be provided.

Updated Housing and Employment Topic Paper

- 2.12 The Housing and Employment Topic Paper (2024) sets out four options for accommodating an additional 500 dwelling uplift to be provided over the plan period. **Option 1 “Increasing Settlement Guidelines and Windfall Allowances”** is the approach being taken forward to meet this need. Shrewsbury (Strategic Centre), Whitchurch (Principal Centre) and the Former Ironbridge Power Station (Strategic Settlement) are identified as the settlements/allocations where the additional need will be met, with Shrewsbury providing the largest proportion of the need (an additional 350 dwellings). Whilst the Tasley Garden Village, Land between Mytton Oak Road and Hanwood Road and Former Ironbridge Power Station will provide for the 1,500 contribution to the GBBCHMA unmet needs. As such, additional site allocations have not been deemed necessary.
- 2.13 Reliance on windfall allowances, the increase in settlement guidelines and increasing capacity of strategic allocations is not considered to be the most appropriate or sustainable way of planning for the additional growth in the District.
- 2.14 It is noted that the strategy proposed focuses in part on windfall allowances, although some of the need may be met this way, it is not considered appropriate to place an over reliance on windfall allowances since it does not reflect positive and proactive planning. Instead, site allocations would allow the Council to properly plan where the additional requirements will be met in the District and therefore, identify and assess the most sustainable locations for development through the plan making process.
- 2.15 A distributed approach to development is considered to be most sustainable by directing development to appropriate sites on the edge of sustainable settlements more generally, instead of on just two settlements in the District. This would avoid placing undue pressure on these settlements whilst also allowing for smaller settlements to benefit from investment, support for economic growth, and footfall from new residents using local services and businesses. Furthermore, focusing additional growth on just two settlements will not achieve the overarching aim of the emerging plan to improve affordability, maximise the viability and vitality of existing services and facilities, and alleviate existing pressures from high demand.
- 2.16 Furthermore, given the potential for delays to delivery for large strategic sites and the significant amount of infrastructure required to serve development, increasing capacity on the Ironbridge Power Station is not considered appropriate to meet these additional needs. As demonstrated by the Regulation 19 representations submitted, there are available sites, in highly sustainable locations, in the District which could be developed early in the plan period and would therefore be capable of providing for this additional need, without the need for significant and costly infrastructure to enable development.
- 2.17 In light of the above, **Option 3 “Increasing Site Allocations”** is supported. As has been previously demonstrated, there are sites, such as that off Sandy Lane, Albrighton, which would be available early in the plan period and could provide a substantial proportion of the additional requirement identified.

- 2.18 Albrighton is a highly sustainable location for housing growth with a wide range of local shops, restaurants, facilities and services as detailed by the Vision Framework and Technical review of the need for new homes in Albrighton, submitted with our Regulation 19 representations and attached as **Appendix 2** of this Statement.

Updated Green Belt Topic Paper

- 2.19 As noted by the Inspectors (ID28), providing contributions to the unmet needs of the GBBCHMA would require the release of Green Belt land, given the Council have also proposed the release of Green Belt land to meet their own needs. The updated SA confirms that the Council will continue with their contribution of 1,500 homes and 30ha of employment land towards the unmet needs of the Black Country and as such, the exceptional circumstances for Green Belt release are considered by the updated Topic Paper.
- 2.20 Table 5.1 sets out a summary of the locations and type of Green Belt release proposed by the emerging plan. It is noted that 1.4 hectares of Green Belt land is proposed for housing development with the vast majority of land released comprising safeguarded sites, and additional safeguarded sites have been identified by the plan.
- 2.21 In respect of Albrighton, a “Key Centre” in Shropshire’s settlement hierarchy, all sites allocated are drawn from safeguarded land, with further safeguarded land identified. Paragraph 6.3 of the Topic Paper reiterates the proposed spatial strategy, incorporating 500 dwellings and 5ha of employment land in Albrighton over the plan period to respond to local needs, comprising of existing commitments and windfall development. This is not considered to be reflective of the sustainability of Albrighton, the availability of local services and amenities, and proximity to employment opportunities, particularly when compared with other settlements.
- 2.22 Furthermore, given the serious shortfall of housing across the Black Country (as set out at paragraph 2.9 of this Statement and at Appendix 1) and noting that the Council have identified sustainable sites that could come forward in the next iteration of the plan, including in Albrighton, as a minimum, the Council should consider whether more of these sites could come forward now. Additional sites in sustainable, “Key Centre” settlements, such as Albrighton, located in close proximity to where the Black Country need arises, would be well placed to provide for additional growth.
- 2.23 Albrighton was previously identified as *“one location where it may be appropriate to accommodate all or part of the proposed contribution to the unmet need forecast to arise within the Black Country”*, as set out at Paragraph 6.9 of the Topic Paper, given it is functionally linked to the Black Country. Although the Council suggest that the settlement size and role in the spatial strategy have limited the contribution Albrighton could make, we would emphasise that it is clearly a sustainable location for growth, with access to multiple services and amenities (as set out in the Vision Document attached at **Appendix 2**). Noting that there are alternative sites available to meet this need, we would also reiterate that growth should be distributed to ensure the vitality of settlements in the long term and to allow for sustainable growth, as per paragraph 2.15 of this Statement and as recognised by Paragraph 6.19 a. ii. of the Topic Paper.

3. Summary

- 3.1 As set out within these representations, it is considered that as currently drafted the additional evidence base documents are not justified and do not meet the tests of soundness in respect of the following areas:
- The contribution Shropshire Council propose towards the unmet needs of the GBBCHMA are considered to be disproportionately small given the significant need demonstrated by the “Falling Even Shorter” report (**Appendix 1**) and the functional links Shropshire has to the Black Country.
 - Reliance on windfall allowances, the increase in settlement guidelines and increasing capacity of strategic allocations is not considered to be the most appropriate or sustainable way of planning for the additional growth in the District. There are sites, such as that off Sandy Lane, Albrighton, which would be available early in the plan period and could provide a substantial proportion of the additional requirement identified. Allocating additional sites would ensure the plan is prepared positively and better enable proactive planning.
 - The proportion of growth identified for Albrighton, a “Key Centre”, is not considered to be reflective of the sustainability of the settlement, the availability of local services and amenities, proximity to employment opportunities, particularly when compared with other settlements, and functional links to the Black Country. Growth should be distributed to ensure the vitality of settlements in the long term and to allow for sustainable growth, whilst also noting the need to increase the proportion of unmet needs provided towards the GBBCHMA shortfall on sites that are close to where the need arises.
- 3.2 Vistry consider that In order for the plan to be found sound at examination, the Council should as a minimum allocate additional growth to Albrighton including our client’s site to the south of Sandy Lane for residential development of approximately 220 homes to assist in delivering much needed market and affordable dwellings.
- 3.3 Vistry would welcome the opportunity to attend further examination hearing sessions to discuss the issues we have identified above which affect the soundness of the plan, and in due course, the Part 2 hearing sessions.

Appendix 1: Turley Falling Even Shorter Report

Falling Even Shorter

an updated review of unmet housing
needs in the Greater Birmingham and
Black Country Housing Market Area

December 2023

Turley

Contents

1. Introduction and purpose	02
2. Update to GBBCHMA unmet need context	04
3. Scale of need up to 2031 and beyond	06
4. Establishing the GBBCHMA supply for 2011-2031 (and beyond)	08
5. Quantifying the unmet need to 2031 (and beyond)	11
6. Conclusions and recommendations	14

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1. Introduction and purpose

Turley is instructed by a consortium of housebuilders and land promoters to provide an updated assessment of the position relating to housing need and land supply across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA' or 'HMA') in order to quantify the true scale of unmet need to 2031, and beyond.

It is now more than two years since the Turley 'Falling Short' report was published. That report critiqued the 'third position statement', published by the GBBCHMA authorities in September 2020, which claimed only a 2,597 housing shortfall remained across the HMA up to 2031. The Turley 'Falling Short' report found that there was a minimum shortfall up to 2031 of almost 9,000 homes.

An addendum to the third position statement was published in December 2020 followed 'Falling Short' indicating that the scale of unmet need as of 31 March 2020 was 6,302 homes. Since then a further addendum to the third position statement was published in April 2023, that now claims a shortfall of 2,053 homes across the GBBCHMA as of 31 March 2021.

Given the wider national planning policy context, since 'Falling Short' no GBBCHMA authority has adopted a new local plan and progress has been faltering:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years.
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

That is despite only North Warwickshire having a plan less than five years old, with the four Black Country authorities not having a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities having a plan adopted over ten years ago as of January 2024.

The lack of plan making progress is at risk of significantly impacting a number of the 14 HMA authorities' ability to meet their housing needs, as required by NPPF paragraph 35. This update to 'Falling Short' therefore seeks to quantify the scale of the unmet need across the GBBCHMA as of 31 March 2023. This includes critiquing the GBBCHMA's most recent position statement, published in April 2023, with a base date of 1 April 2021.

Purpose of this report

This report provides the consortium's independent assessment of the overall housing need and supply position so as to identify the true updated scale of unmet need, focusing on the period to 2031.

The focus upon 2011 to 2031 reflects the timeframe covered by the position statements, as well as various other evidence base studies concerning need and supply prepared since 2013. As with 'Falling Short', this report does consider the position beyond 2031 in high level terms up to 2036 and 2040, mindful that NPPF paragraph 22 requires local plan strategic policies to look ahead over a minimum 15 year period from adoption and set a vision that looks further ahead (30 years), and that all emerging plans are considering plan periods beyond 2031.

The consortium

The consortium comprises the following housebuilders and land promoters, all of whom play a key role in the strategic planning of sustainable housing delivery across the HMA and wider West Midlands region:

- **Bellway Homes**
- **Catesby Estates Plc**
- **Gladman Developments Ltd**
- **Hallam Land Management**
- **Harworth Group Plc**
- **Taylor Wimpey**
- **Vistry Group Plc**
- **Wain Estates**
- **William Davis Homes**

Report structure

The report is structured as follows:

- **Section 2** summarises the most up to date GBBCHMA unmet need context.
- **Section 3** assesses the scale of housing need to 2031, and beyond.
- **Section 4** provides an overview of the most up-to-date position in respect to the GBBCHMA's total housing supply for 2011 to 2031.
- **Section 5** draws conclusions on the scale of unmet need to 2031 and beyond, taking into account the HMA's total need and evidenced supply.
- **Section 6** sets out the overall conclusions in respect to the scale of the unmet need.

2. Update to GBBCHMA unmet need context

This section provides an update on the GBBCHMA unmet need context, including the current starting point for calculating the unmet need.

GBBCHMA Position Statement Addendum (April 2023)

The Position Statement Addendum (the 'Addendum'), dated April 2023 and published in October 2023, provides the supply and shortfall position across the GBBCHMA between 2011 and 2031 as of 31 March 2021. The Addendum continues to use the Greater Birmingham HMA Strategic Growth Study ('SGS') (2018) prepared by GL Hearn and Wood as the starting point for calculating the HMA's housing needs. This is reflected on further at section 3 of this report in determining the scale of need for housing across the GBBCHMA.

The Addendum also continues to consider the level of unmet need **up to 2031**, this reflects the timeframes for the SGS, which essentially uses the Birmingham Development Plan's plan period as its starting point.

The Addendum claims the HMA has a housing supply of 205,926 homes for 2011-2031 as of 31 March 2021. Against the SGS' 'baseline' housing need for the same plan period of 205,099 homes, and factoring in a contribution to the Coventry and Warwickshire Housing Market Area ('CWHMA') of 2,880 homes, the Addendum indicates that the remaining shortfall of housing across the HMA has reduced to 2,053 homes.

The Addendum's base date is now more than two years' ago. Firstly, there has been two years' worth of additional monitoring data, and in some cases, updated supply positions, which essentially renders the position in the Addendum out of date (which is explored further at section 4 of this report in terms of how the supply position across the HMA is assessed).

Secondly, in that time there has been limited local plan progress across the entire HMA.

Local plan progress

With circa 43% of the entire GBBCHMA comprising Green Belt, local plans are an absolutely critical tool in ensuring the HMA meets its housing needs. It is clear that brownfield land will not be enough to meet the HMA's needs, as demonstrated by the shortfall that still remains unaccounted for from the Birmingham Development Plan adopted nearly seven years' ago, and the emerging Dudley and Sandwell plans and their associated evidence bases (which are discussed below).

Almost three years have passed since 31 March 2021. In that time there has been limited progress in advancing local plans across the HMA. Even since April 2023, the context has significantly changed and plan making across the HMA has faltered, as summarised below:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years. Following this each local authority is now preparing its own individual plan. So far Sandwell has published a draft plan with a 18,606 housing shortfall (62% of the borough's total need), and Dudley's draft plan proposes a shortfall of 1,078 homes (9% of the borough's total need).
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to their issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021. The examination was paused in June 2023, pending any updates to the NPPF.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

This is despite national planning policy requiring reviews of plans every five years. Only North Warwickshire have a plan less than five years old, the four Black Country authorities do not have a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities have a plan adopted over ten years ago as of January 2024

Furthermore, it does not appear that this position will change in the short term. Just four authorities have local development schemes committed to submitting a plan before the end of 2024, with a further three committed to submitting before the end of 2025.

With the HMA significantly constrained by Green Belt, local plans are critical to ensuring its housing needs are met in full as brownfield land will not have sufficient capacity alone. Without local plans being advanced reviewing Green Belt boundaries, it is unlikely the GBBCHMA's housing needs can be met in full. This is the critical matter that this report will explore.



3. Scale of need up to 2031 and beyond

Considering the need to 2031

The Addendum continues to reference the ‘baseline’ scenario from the SGS, which suggests a minimum need for 205,099 homes between 2011 and 2031 or 10,255 homes per annum on average.

While this technically remains the last study to have consistently assessed need in all 14 authorities, it is clearly becoming increasingly dated having been finalised almost six years ago in February 2018, and no doubt produced over an extended period prior to that. The extent to which the SGS continues to represent ‘up-to-date evidence’, of the kind that the NPPF at paragraph 31 expects to underpin all planning policies, is therefore open to question. It patently does not allow for the population of the HMA to be some 4% larger than it was then, nor for the area to offer around 8% more jobs, and for the affordability of housing relative to earnings to have worsened in every single authority by an average of 19%¹.

The SGS has undoubtedly had value in providing a consistent assessment of need across the HMA, but circumstances have changed with the introduction of a standard method that has now been required to form the basis of plan-making for almost five years. It was explicitly designed to standardise assessments of housing need, bringing consistency between local authorities and consequently filling at least part of the role formerly played by the SGS. Many of the authorities in the HMA appear to have taken the same view, having commissioned various studies that feature the standard method which generally consider it to provide a reliable indication of their local housing need.

As such, it is highly relevant to note that the standard method suggested a greater need for some **11,868 dwellings per annum** as of April 2021, the base date of the Addendum.

However, this is known to have underestimated the full need as it included a figure for Birmingham that was capped above an existing requirement, but the lifting of the cap in January 2022 – when the Birmingham Development Plan became more than five years old – elevated the need to **at least 13,868 dwellings per annum** and it subsequently rose even further, to at least **14,341 dwellings per annum** in April 2023, when new affordability data was taken into account.

This should not necessarily replace in full the scenario developed in the SGS, which looked back to 2011, but that should equally not take precedence over a standard method that has now been in place for almost five years. The NPPF makes clear at paragraph 61 that it should be used to assess the minimum need for housing in all but exceptional circumstances, which have clearly not been demonstrated by the local authorities in this area.

A sensible and rational approach in these circumstances, which provides a level of consistency with the SGS while adhering to current national policy, would be to align with the SGS ‘baseline’ scenario in the ten years to the base date of the Addendum (2011-21) before aligning with the outcome of the standard method, as of the base date of April 2021, for the second ten-year period² (2021-31). This results in a minimum need for **221,230 homes** over the entire twenty years, some 8% more than suggested by the PSA³.

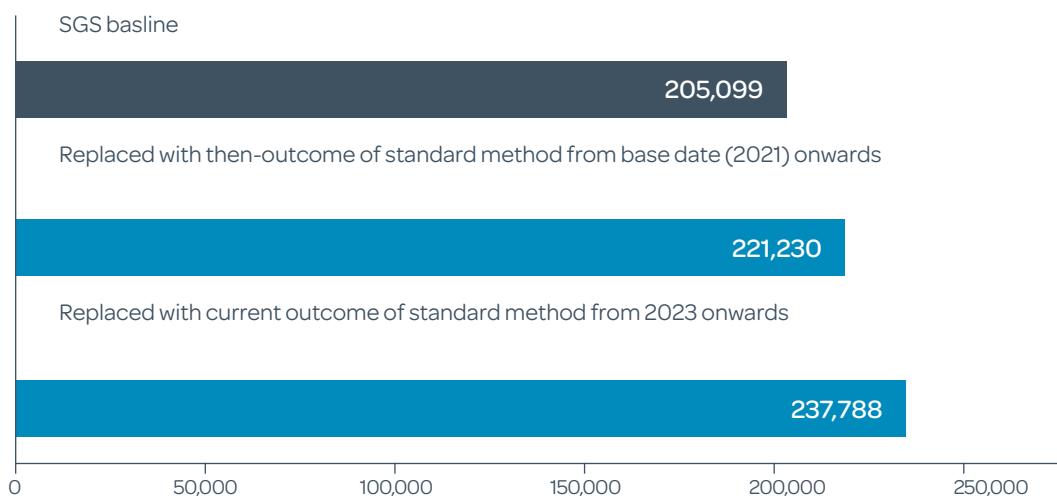
That said, with the outcome of the standard method known to have been an underestimate in April 2021 – rising thereafter, due to worsening affordability and the lifting of the cap in Birmingham – it is arguably also appropriate to consider a scenario based on the current outcome of the standard method (14,341dpa). This would suggest a substantially greater need – for some 237,788 homes in total – even if it was to be applied only from 2023 onwards, reverting to the SGS for the prior two years to avoid using the outcome of the standard method so retrospectively.

¹Comparing data for 2022 to equivalent figures for 2015, where this appears to have been the latest population data available when the SGS was prepared (according to its paragraph 3.26)

²11,868 dwellings per annum

³Excluding the 2,880-home contribution to the Coventry and Warwickshire HMA, which – though included in the Addendum – is considered separately in this report’s section 5

Figure 3.1: Turley Estimates of Overall Housing Need (2011-31)



Source: Turley analysis

Looking beyond 2031

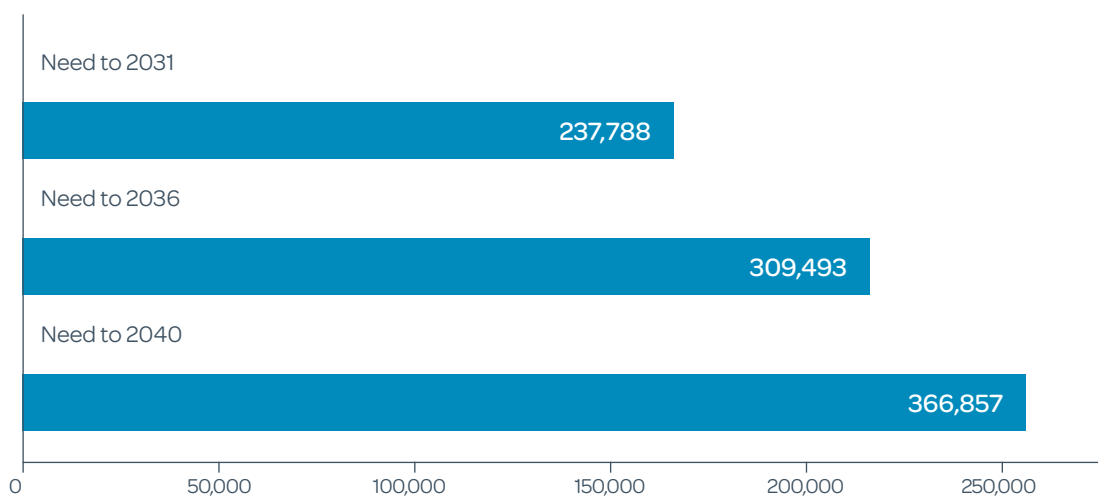
While the above – like the Addendum – provides an estimate of need to 2031, it can be easily extended to cover a longer period to 2036 or 2040.

This is important because NPPF paragraph 22 requires emerging local plans in the HMA to look at least 15 years into the future, such that they are seeking to deliver strategic growth into the late 2030s and even beyond in some cases.

While the standard method technically draws upon a ten-year baseline, the PPG makes clear that its outcome can be extrapolated as necessary to cover any period⁴.

It is not considered appropriate to extrapolate the capped figure in this way but using the current outcome of the standard method from 2023 onwards and using the SGS ‘baseline’ to that point, suggests that some 309,493 homes are needed throughout the HMA between 2011 and 2036. Circa 366,857 homes are implied to be needed when using the same approach for the period from 2011 to 2040.

Figure 3.2: Estimated Need to 2036 and 2040



⁴PPG Reference ID 2a-012-20190220

4. Establishing the GBBCHMA supply for 2011-2031 (and beyond)

'Falling Short' sets out general observations in respect to the supply identified in the third position statement (September 2020), and the majority of those remain relevant in respect to the Addendum, including:

- It only addresses 2011 to 2031 despite local plan reviews now looking well beyond that.
- The base date then was 31 March 2019 and more than two years had passed at the point of 'Falling Short' being published, with the Addendum having a base date of 31 March 2021 the supply data remains two years out of date.
- The supply is broken down into different categories for all 14 authorities, however the raw data underpinning this is not provided as part of the Addendum, or any previous position statement.
- The supply data has not been independently examined.
- The supply is 'unadjusted' as it does not apply the standardised non-implementation discount rates from the SGS which provided a consistent approach across the HMA. Instead, only local discount rates are applied so several authorities do not apply any discounts for non-delivery (Birmingham, Bromsgrove, Redditch and Stratford).

The 14 authorities' agreed position in respect to the extent of the total supply across the entire GBBCHMA between 2011 and 2031 is **205,926 homes**, as presented at paragraph 3 of the Addendum. The Addendum has a base date of 31 March 2021 and includes all completions up to that point. This represents a total shortfall of 2,053 homes, a significant reduction from 6,302 homes as of 31 March 2020 (as presented in the December 2020 Addendum to the third position statement). Paragraph 3 of the Addendum states that Birmingham is responsible for the majority of the additional capacity identified.

More than two years have passed since then, the Addendum therefore does not reflect any housing completions or additional supply which has come forward in the intervening period. This report therefore seeks to assess the GBBCHMA's supply based on the most up-to-date evidence available.

Method of analysis

A critical factor in any analysis of the shortfall position across the GBBCHMA is an accurate position of the HMA's overall supply.

To understand the 14 authorities' current supply positions this report has reviewed in detail all the most up-to-date evidence, which is summarised in Table 4.1 below.

Table 4.1: Source of evidence for completion and supply data

Authority	Most up-to-date evidence	Base date
Birmingham	2020 SHLAA (March 2022) and Five Year Housing Land Supply Statement 2023-2028	31 March 2023
Bromsgrove	Housing Land Supply in Bromsgrove 2011-2022 (April 2023)	31 March 2023
Cannock Chase	Authority Monitoring Report 2021-22 (undated)	31 March 2021
Dudley	SHLAA 2021/22 Update (undated)	31 March 2022
Lichfield	Five Year Housing Land Supply 2023 (July 2023)	31 March 2023
North Warwickshire	Annual Monitoring Report Up to 31 March 2022 (November 2023)	31 March 2022
Redditch	Housing Land Supply in Redditch 2011-2022 (April 2023)	31 March 2023
Sandwell	SHLAA and 5 Year Housing Land Supply Update as of April 2022 (October 2023)	31 March 2022
Solihull	Examination of Solihull Local Plan – Housing Trajectory and Five Year Housing Land Supply (December 2021) / Draft SHELAA Update 2020 (October 2020)	31 March 2021
South Staffordshire	Housing Monitoring and Five Year Housing Land Supply 2022-2023 (December 2023)	31 March 2023
Stratford	Authority Monitoring Report 2021-22 (December 2022), SHLAA and Five Year Housing Land Supply report Update March 2023	31 March 2023
Tamworth	Draft Housing Delivery Paper (December 2023)	31 March 2023
Walsall	Strategic Housing Land Assessment and Statement of Housing Land Supply 2022 (undated)	31 March 2022
Wolverhampton	SHLAA 2022 (September 2023)	31 March 2022



The majority of the GBBCHMA authorities' most up-to-date evidence available is prepared on the basis of a 31 March 2022 base date, though there are a few exceptions where it is based on an older base date of 31 March 2021 (i.e. Birmingham, Solihull, and Stratford).

This report's independent assessment of the supply position across the GBBCHMA is on the basis of a **31 March 2023 base date**. To complement the 14 authorities' most up-to-date evidence this report uses the DLUHC's net additional dwellings by LPA table (table 122)⁵ so that it reflects the most up-to-date data for completions for 2022-23 (i.e. up to 31 March 2023), and for those authorities who only provide completion data for 2020-21 (i.e. up to 31 March 2021).

As part of this exercise, all 14 authorities were contacted to confirm the data that was used to inform the addendum and the most-up-date source of evidence in respect to housing supply.

Supply position

Based on the above methodology, the most up-to-date evidence demonstrates that the total supply across the GBBCHMA between 2011 and 2031 is **199,992 homes**.

As per paragraph 4 of the Addendum, the Coventry and Warwickshire Housing Market Area (CWHMA) Memorandum of Understanding assumes that a total of 2,880 homes from North Warwickshire and Stratford are to contribute to that HMA's unmet needs. Reflecting the Addendum's approach, the report therefore adds this contribution to the minimum housing requirement, when quantifying the housing need at section 5.

This is even before interrogating the components of supply which make up each authorities' supply. For instance, Birmingham has assumed that the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site. It also does not include a standardised non-implementation discount rate, therefore the individual supply position for at least four of the authorities does not factor in any non-implementation discount.

Reflecting the above, the supply position of **199,992 homes** can therefore be assumed to be a 'best case' scenario.



⁵DLUHC Live tables on housing supply: net additional dwellings by LPA (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>)

5. Quantifying the unmet need to 2031 (and beyond)

Having presented the most up-to-date scenarios in terms of the HMA's needs at section 3 and supply at section 4, this section quantifies the true scale of the HMA's unmet need between 2011 and 2031.

Addendum shortfall position

Set out in Table 5.1 below is the shortfall position based on the Addendum's claimed supply of **205,926 homes**.

Table 5.1: Scale of GBBCHMA shortfall based on Addendum claimed supply

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Addendum claimed supply	205,926	205,926	205,926
Scale of shortfall	2,053	18,184	34,742

Using a base date of 31 March 2021 and not seeking to interrogate the data presented in the Addendum, the claimed shortfall is 2,053 homes based on the SGS baseline.

The Addendum however fails to fully acknowledge that circumstances have changed since the SGS was published with the introduction of the standard method. The starting point for calculating unmet need should therefore be based on using the standard method to calculate housing need from the base date of 31 March 2021.

When applying the then-outcome of the standard method from the base date, the shortfall is 18,184 homes. If the current standard method were to be applied from the current base date of 31 March 2023, the approach advocated by this report for the reasons set out at Section 3, the shortfall is 34,742 homes.

As national planning policy and guidance is clear that standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position alone, the shortfall position across the GBBCHMA stands at 34,742 homes.

Turley shortfall position

The Addendum was based on data with a 31 March 2021 base date. As discussed earlier there is now more up-to-date evidence for the majority of authorities in terms of both completions and proposed supply, as well as national completion data.

Section 4 of this report has therefore calculated a total supply position using a base date of 31 March 2023. Table 5.2 below sets out the Turley supply position against the different need positions.

Table 5.2: Scale of GBBCHMA shortfall based on Turley supply position

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards (Turley advocated approach)
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Turley supply	199,992	199,992	199,992
Scale of shortfall	7,987	24,118	40,676

Using the most up to date base date, following the Addendum's approach of using the SGS baseline housing need figure, the shortfall is **7,897 homes** across the HMA up to 2031.

Reflecting national planning policy and guidance, the housing need scenarios which incorporate the standard method should be used as a starting point for calculating the HMA's unmet needs, in particular the scenario which uses the current outcome of the standard method from 2023 onwards. When these are applied the shortfall ranges between **24,118** and **40,676 homes**.

The above assumes the supply data in each authorities' evidence base documents is accurate. Given the minimum shortfall position on the council's and government evidence alone is significant, it is not necessary to further interrogate in detail the components of supply. However, a review of the evidence base documents demonstrates that some sites included in supplies do not meet the definition of deliverable for reasons such as still being in another use.

Ambitious delivery rates which are unlikely to be met have also been assumed for some sites. Indeed it has been assumed the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site.

Conclusions on unmet need to 2031

The above analysis reveals that there remains a significant unmet need across the HMA to 2031 with the window to deliver this continuing to narrow.

The 14 authorities should be planning positively to deliver the most recent standard method need and ensuring the unmet need of **40,676 homes** up to 2031 as reflected in the most up-to-date evidence is accommodated in full through emerging local plans.

Looking ahead – an indication of the shortfall to 2036 and 2040

As with 'Falling Short', it is difficult to accurately quantify the unmet needs beyond 2031 because there remains an incomplete picture in terms of the HMA's housing supply beyond this date. This report provides an indication of the potential scale of unmet need between 2011 and 2036, and 2011 and 2040, based on each authorities' most up-to-date evidence.

From reviewing the data it is clear there is no supply information for the majority of authorities post 2031. This report has therefore taken the same approach as 'Falling Short' and therefore sought to extrapolate the Addendum and Turley supply position by annualising the supply figure (10,296 homes and 10,000 homes, respectively rounded up) and applying the annual figure each year beyond 2031.

This has been tested against the 2036 and 2040 need positions which use the standard method from 2023 onwards, the approach this report advocates as presented at section 3.

This approach is relatively simplistic and crude and it is arguable as to whether the urban areas can continue to deliver at rates similar to 2011-2031 and how any changes to national planning policy may impact this. It however provides a useful indicator as to the potential scale of the shortfall post-2031, as summarised below.

Table 5.3: Scale of GBBCHMA shortfall up to 2036 and 2040

	Need to 2036	Need to 2040
Need	309,493	366,857
Need with CWHMA contribution	312,373	369,737
Addendum claimed supply (extrapolated)	257,400	298,584
Shortfall against claimed Addendum supply	54,973	71,153
Turley supply (extrapolated)	250,000	290,000
Shortfall against Turley supply	62,373	79,737

As referred to above, this exercise provides the likely direction of travel in terms of unmet need across the HMA, which will likely be established via emerging local plans with unmet need, such as Birmingham.

6. Conclusions and recommendations

The 14 Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') authorities published in October 2023 (dated April 2023) their updated Position Statement Addendum ('the Addendum'). The headline conclusion was that, as of 31 March 2021, the 2011 to 2031 shortfall across the GBBCHMA is estimated to be 2,053 homes.

In response this report has been commissioned by a consortium of housebuilders and promoters to provide an updated position to the Turley 'Falling Short' report (August 2021) to take stock of the position in order to quantify the true scale of unmet to 2031, and beyond.

As with 'Falling Short', this report has focused on 2011 to 2031 as the timeframe covered by the Addendum. The report has however looked beyond 2031 in high-level terms given emerging plans across the GBBCHMA will go well beyond 2031.

The Addendum, published in October 2023, claims the GBBCHMA's shortfall arising between 2011 to 2031 has now reduced to 2,053 homes. This is however predicated on a base date of 31 March 2021, nearly three years ago. In that time, there is now additional monitoring data, and updated supply positions from the majority of GBBCHMA authorities, which has not been reflected in the Addendum's findings.

Furthermore, the Addendum continues to reference a need for **205,099 homes** over the period from 2011 to 2031, based on the Greater Birmingham HMA Strategic Growth Study (2018) that is increasingly dated having been produced almost eight years ago.

The standard method has since been introduced, offering the consistency that the SGS itself sought to provide. While this cannot be backdated to 2011, it can be reasonably used in place of the SGS scenario as an indicator of future needs.

Applying it from the base date of the Addendum (31 March 2021) suggests that some **221,230 homes** are needed between 2011 and 2031 but this rises to **237,788** when the current outcome is used from 31 March 2023 onwards, allowing for worsening affordability and the removal of the cap for Birmingham. This approach, which best reflects national policy, indicates that some 309,492 homes are needed over the longer period from 2011 to 2036, with 366,857 needed to 2040.

As national planning policy and guidance is clear that the standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position, the shortfall position across the GBBCHMA stands at **34,742 homes**. Based on the Turley supply this shortfall increases to **40,676 homes**. This is the scale of unmet need that best represents the most up-to-date evidence. This shortfall increases to **62,373 homes** up to 2036, and **79,737 homes** up to 2040, when extrapolating the available supply data.

As required by the duty to cooperate it is critical that this quantified unmet need up to 2031 should be distributed between emerging local plans and delivered. This will require difficult decisions, including reviewing Green Belt boundaries.

As suggested in 'Falling Short', it remains the case that a strategic plan or framework is required to cover long term growth across the GBBCHMA, potentially to 2040 and beyond.



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Appendix 2: Regulation 19 Representations

**Shropshire Local Plan Review: Pre-Submission
Draft Consultation (Regulation 19)**
Representations on behalf of Vistry Homes

February 2021

Turley

Contents

1.	Introduction	1
2.	The Site	3
3.	Strategic policies	5
4.	Development management policies	9
5.	Albrighton Place Plan Area	11
6.	Conclusion	13
	Appendix 1: Vision Framework	14
	Appendix 2: Technical review on the need for new homes in Albrighton	15
	Appendix 3: 'The Shropshire Test'	16

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24 Feb 2021

1. Introduction

- 1.1 Turley is instructed by Vistry Homes Limited (Vistry) to represent their interests in relation to Shropshire Council's Regulation 19: Pre-submission Draft Local Plan 2016 – 2038 (December 2020) (the LP) in the context of 11.7 hectares of land to the west of Albrighton (the site) which Vistry are promoting for residential development.
- 1.2 The site represents a sustainable and deliverable residential land opportunity for around 218 new market and affordable homes, and public open space.
- 1.3 These representations consider the soundness of the Regulation 19 Draft Shropshire Local Plan in accordance with paragraph 35 of the National Planning Policy Framework (NPPF) which requires plans to be positively prepared, justified, effective and consistent with national policy if they are to be found sound.
- 1.4 As currently drafted, Vistry do not consider the plan to be sound and the remainder of these representations provide commentary and details in response to key policies to outline steps to be taken to ensure that the Plan can be found sound.

Vistry Homes

- 1.5 The Vistry Group was established in January 2020 following the merger of Bovis Homes Limited, Linden Homes and Galliford Try Partnerships. With developments across the United Kingdom Vistry Group will be delivering around 12,000 affordable and market homes a year.
- 1.6 Vistry are promoting land to the west of Albrighton (SLAA Ref. ALB015) for residential development on behalf of the landowner.
- 1.7 The strategic land team at Vistry Group has a successful track record for promoting sites through the Local Plan preparation process and working in close partnership with Parish Councils, local planning authorities, landowners and the local community to deliver well designed and successful new places.
- 1.8 Representations have previously been submitted, principally under the trading name of Bovis Homes, to the following consultation stages:
 - Site Allocation and Management of Development Plan (SAMDev)
 - Shropshire Local Plan Review – Consultation on Preferred Scale and Distribution of Development (October 2017);
 - Strategic Land Availability Assessment (March 2018);
 - Shropshire Local Plan Review Consultation on Preferred Strategic Sites (September 2019); and
 - Shropshire District Council's Local Plan Review: Consultation on Pre-submission Draft (Regulation 18).

Structure of representations

1.9 The remainder of these representations are separated to align with individual chapters within the Pre-Submission Draft Local Plan as set out below:

- **Section 2:** The Site
- **Section 3:** Strategic policies
- **Section 4:** Development management policies
- **Section 5:** Albrighton Place Plan Area
- **Section 6:** Conclusion

2. The Site

- 2.1 Throughout the promotion of the site, Vistry have developed a site specific evidence base to inform the masterplanning of the site and underpin its deliverability. This site specific evidence base was submitted in support of Vistry's representations to the Issues and Options Consultation in April 2017 and then compiled into a 'Vision Framework' which supported their representations to the 'preferred sites' consultation in February 2019. A copy of the Vision Framework is enclosed at **Appendix 1**.
- 2.2 The site is located to the east of Newport Road, adjacent to the existing built up area of Albrighton. It is bounded by Newport Road to the west, the railway to the north and Rectory Road to the east. Sandy Lane runs through the northern area of the site connecting Newport Road to Rectory Road, although in part it is an unmade track.
- 2.3 The site's peripheral boundaries and the internal field boundaries are formed by maintained native hedgerows.
- 2.4 The Albrighton and Donington Local Nature Reserve lies directly to the south of the site set within a small, shallow wooded valley. It contains a historic pool, Willow Carr woodland, a series of ponds and informal pathways running through areas of woodland and meadow. The whole site is located within the West Midlands Green Belt.
- 2.5 The site is located adjacent to the Albrighton and Donington Conservation Area which includes St Cuthbert's Parish Church, St Mary Magdalene Church, St Cuthbert's Well, Albrighton Pool and the Old Rectory. Both churches are grade II* listed buildings.
- 2.6 Albrighton is a very sustainable location for housing growth with a wide range of local shops, restaurants, facilities and services as detailed within the 'Technical review of the need for new homes in Albrighton' report enclosed at **Appendix 2** which has been prepared by Turley. These services and facilities are mainly centred on the High Street and can be easily reached by foot and cycle.
- 2.7 Albrighton has very good public transport services. There are currently three bus services which serve Albrighton, providing frequent services to local higher order settlements including Telford and Wolverhampton. All three services run along the site boundary with Newport Road and serve the existing stops near to Worthington Drive. Albrighton and Cosford train stations are both within walking and cycling distance of the site (1.3km and 0.9km away respectively). Both stations are served by West Midland services which operate hourly, between Birmingham, Wolverhampton, Telford and Shrewsbury.
- 2.8 The removal of the site from the Green Belt and allocation for residential development will deliver the following key benefits:
 - opportunity to deliver approximately 218 dwellings on a phased basis on a well-contained site with strong defensible boundaries;
 - provision of new homes sustainably located within close proximity to the strategic allocation of 221 ha of land at RAF Cosford for employment;

- a site which is suitable, available and deliverable and will provide an immediate opportunity to deliver housing within the plan period;
- delivery of a range of house types and tenures, including both market and affordable housing that will allow a diverse community to expand, integrate and grow alongside existing development in Albrighton, securing significant social capital for the village;
- provision of approximately 5Ha of public open space, including a play area which will promote social opportunities and a healthy lifestyle; and
- additional landscaping and planting which will provide appropriate screening as well as enhancements to habitat delivery and biodiversity net gain.

3. Strategic policies

Policy SP1: The Shropshire Test

- 3.1 'The Shropshire Test' provides a series of guiding principles which should assist the Council in being able to identify the most sustainable locations for meeting the identified housing and employment need throughout the plan area and aligning with national policy insofar as providing a mechanism to test the sustainability of sites with the 'tests' aligning with the objectives set out within NPPF paragraph 8.
- 3.2 In the context of this test (and as demonstrated in the table enclosed at **Appendix 3**), Albrighton is a sustainable location for further housing growth given its excellent social, community and transport infrastructure, and the approach advanced in the draft plan to support the growth of RAF Cosford as a strategic employment site (Policy S21). It is on the edge of the Black Country and wider Greater Birmingham conurbation, with a regular rail service to Wolverhampton, Birmingham City Centre, Telford and Shrewsbury, and is in close proximity to the M54 growth corridor (comprising the employment sites at i54, ROF Featherstone, and the estates on Wobaston Road).

Policy SP2: Strategic Approach

- 3.3 Policy SP2, the 'Strategic Approach' establishes that over the plan period 30,800 new dwellings will be delivered, equating to around 1,400 dwellings per annum (dpa). This represents 223 additional dwellings per annum (4,906 additional new homes across the plan period) than Shropshire's standard method local housing need of 1,177 dwellings per annum. This includes a 1,500 home contribution to the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) shortfall. In this respect the draft Plan specifically references this contribution meeting the Black Country shortfall.
- 3.4 The supporting text to policy SP2 and the sustainability appraisal are clear that the higher housing growth being pursued "*...offers significant opportunities to meet the requirements of all sections of society in terms of location, affordability and adaptability. It is likely to support existing services such as schools, doctor's surgeries, shops and play areas in the medium to long term*" (page 90 of the draft Plan SA).
- 3.5 Whilst we welcome the uplift above the county's minimum standard method housing need in principle, we do not agree that the plan's spatial strategy, in particular the amount of growth proposed for Albrighton (500 dwellings), will realise the opportunities identified in the draft Plan and SA to improve affordability or maximise the viability and vitality of existing services and facilities (a requirement of NPPF paragraph 78 also), nor alleviate existing pressures from pent up demand.
- 3.6 The spatial strategy also does not reflect where significant job creation is expected (such as at Cosford and along the M54 / A5 growth corridor). NPPF paragraph 93 encourages an integrated approach to considering the local of housing, economic and community facilities and services to enable healthy communities. The level of growth proposed at Albrighton does not reflect this.

- 3.7 At the same time, the spatial strategy also fails to respond to where the Black Country shortfall arises. Greater development should be located in closer proximity to the Black Country to meet this need where it arises.
- 3.8 The Turley Technical Review of the Need for New Homes in Albrighton (enclosed at **Appendix 2**) demonstrates that there is long-term decline in Albrighton's population and a more recently static picture which is materially changing the demographic profile of the town. Where historically it has demonstrated a notably sustainable profile, including a high proportionate share of those of working age, it is rapidly seeing an ageing of its population.
- 3.9 Whilst the ageing of its population is an inevitable consequence of earlier growth, this is compounded by a sustained reduction in younger people, including children as a result of its constrained growth. This constrained growth has also resulted in affordability issues in the village, specifically for first time buyers.
- 3.10 This absence of new supply is compounded by the high demand for homes. There is evidence of an acute worsening of market conditions, with consequences for the affordability of housing. This is further limiting the ability of younger households to access housing in the settlement, which is further inhibited by the lower representation of smaller homes in Albrighton.
- 3.11 Influenced in part by its proximity and accessibility to RAF Cosford as a significant employer and a proposed allocation for greater employment growth (which Vistry fully support) Albrighton has demonstrated relatively strong commuting patterns with RAF Cosford and also with its wider alignment with key strategic corridor along the M54 / A5. Yet there is no substantial or reasonable consideration in the draft Plan of the relationship between job creation at Cosford and the need for new homes nearby.
- 3.12 This is despite the draft Plan acknowledging itself at paragraph 5.15 (page 169) that the:
- "...relationship between Albrighton and the nearby Strategic site at RAF Cosford, with many employees and personnel based at RAF Cosford choosing to live in Albrighton and/or use the facilities within the settlement and certain facilities at RAF Cosford being available for residents of Albrighton".*
- 3.13 Given the clear evidence that Albrighton's housing delivery remains constrained despite a pressing need and growing demand, and the anticipated and planned significant employment growth at Cosford, a greater quantum of growth should be directed to Albrighton to ensure the plan is consistent with national policy, positively prepared, effective and justified.
- 3.14 Vistry's site to the west of Newport Road can make a significant contribution to this, as well as the wider county's housing needs, in a well-contained location.
- 3.15 We comment further on the proposed allocations at **Section 5** and the proposed safeguarded land in response to policy SP3 below.

Policy SP3: Climate Change

- 3.16 In order to address climate change, as well as fundamental climate change targets and policies, in line with NPPF paragraph 103, it is essential that new development is directed to the most sustainable settlements which are already within close proximity to existing and emerging key employment locations, and which already benefit from sustainable means of transport.
- 3.17 The identified housing guideline for Albrighton is limited to 500 dwellings. This level of growth does not reflect its exceptional sustainability which is clearly evidenced within the Council's 'Hierarchy of Settlement Paper', including a railway station with services to Cosford, Wolverhampton, Birmingham, Telford and Shrewsbury, a wide range of services and facilities and also in close proximity to the Strategic Employment Site at RAF Cosford. Nor does it recognise the planned significant job creation at Cosford, contrary to NPPF paragraph 92.
- 3.18 Indeed the artificial suppression of growth at Albrighton is exemplified by the plan's inconsistency in directing the same amount of new housing to Craven Arms, which is much further from employment opportunities, is more remote from strategic highway connections and is a significantly reduced provision of services and amenities compared with Albrighton.
- 3.19 As drafted Policy SP3 is therefore not positively prepared or consistent with national planning policy.

Policy SP4: Sustainable Development

- 3.20 Policy SP4 'Sustainable Development' duplicates the NPPF and reiterates the principles set out within Section 38 (6) of the Planning and Compulsory Purchase Act 2004.
- 3.21 PPG states:
- "Paragraph 11 of the National Planning Policy Framework indicates that Local Plans should reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. However, there is no need for a plan to directly replicate the wording in paragraph 11 in a policy"* (Paragraph: 036 Reference ID: 61-036-20190723).
- 3.22 Policy SP4 would therefore be more effective if further details were provided relating to how the presumption will be applied locally, otherwise it should be deleted.

Policy SP11: Green Belt and Safeguarded Land

- 3.23 Paragraph 136 of the NPPF states that where necessary, Councils should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching beyond the plan period.
- 3.24 The role of safeguarded land is not just to ensure that Green Belt boundaries are enduring, but also to provide a 'contingency' of land in sustainable locations, outside

the Green Belt, which can come forward for development to meet housing needs. It assists in 'de-risking' the plan, should any of its allocations not come forward or if there are any significant delays.

- 3.25 Albrighton is one of the most sustainable settlements within the county and also one of only a small number which is wholly constrained by the West Midlands Green Belt given its proximity and functional relationship with the built up area of Wolverhampton. As such unlike other more rural and less sustainable settlements, there are limited opportunities where windfall sites can come forward to meet local need at Albrighton.
- 3.26 Although provision is made for safeguarded land at Albrighton, it is in no way proportional to the village's sustainability and role in the settlement hierarchy. Table SP11.1 underlines this point. 9.28ha of safeguarded land for future residential development is proposed at Shifnal, which sits within the same tier in the settlement hierarchy, albeit is larger and therefore has a larger allocation of 1,500 dwellings. In contrast a much less proportional provision of safeguarded land for residential development at Albrighton of 19.9ha is proposed.
- 3.27 If the plan is to take a consistent approach and is positively prepared and effective a greater provision of safeguarded land should be proposed at Albrighton.
- 3.28 At the same time there are significant concerns regarding the suitability of the land proposed for safeguarding at Albrighton, which we discuss further at **Section 5** of these representations.

Policy SP14: Strategic Corridors

- 3.29 The Shropshire Economic Growth Strategy identifies the 'M54 growth corridor' as one of the key strategic corridors and growth zones.
- 3.30 In considering the implications of the strategic M54 growth corridor for Albrighton, the 'M54 Growth Corridor – Strategic Options Study' (June 2019), identifies RAF Cosford as one of the key strategic sites considering the existing levels of employment it provides and also future expansion and opportunities. This reinforces our view that the employment growth proposed for Cosford is significant and therefore a greater provision of housing is needed in close proximity to sustainably realise the employment allocation's potential.

4. Development management policies

Policy DP1: Residential Mix

- 4.1 The draft plan should not include a prescriptive policy on housing mix, size, types or tenure as needs will change over the plan period. Such a policy would potentially undermine viability and delivery of sites.
- 4.2 Vistry consider that any such policy should be dealt with as a supplementary planning document which can be regularly updated and, in addition, there should be no 'blanket' policy – standards should reflect the needs of specific settlements and areas.

Policy DP2: Self Build

- 4.3 Vistry recognise that planning for opportunities for self-build is important. However, in line with Vistry's response to Policy DP1, the imposition of an inflexible requirement for the delivery of serviced plots on sites could again undermine the viability and deliverability of sites and there should be provision for the suitability of self-build to be considered on a site by site basis.

Policy DP3: Affordable Housing Provision

- 4.4 Paragraph 20 of the NPPF states that strategic policies should make provision for housing, including affordable housing. Paragraph 62 of the NPPF goes further to distinguish that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified.
- 4.5 Part 1B of Policy DP3 and its reference to 'exceptional circumstances' must therefore be deleted as it directly conflicts with guidance contained within the NPPF.

Policy DP11: Minimising Carbon Emissions

- 4.6 The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020.
- 4.7 Policy DP11 should therefore be deleted as it will be a duplication of national guidance.

DP28. Communications and Transport

- 4.8 Aligned to the three overarching objectives of sustainable development identified within paragraph 8 of the NPPF, Policy DP28 seeks to deliver a sustainable pattern of growth and development, investing in the necessary communications and transport infrastructure and services, providing remote access to services and employment and making available accessible, safe, reliable, low carbon transport modes and active travel choices.

4.9 As set out in response to Policy SP2, Vistry do not consider that the strategic approach aligns with the intent of Policy DP28 and specifically in the artificial suppression of Residential Growth in Albrighton, one of the county's most sustainable settlements which is closely related to both the GBBCAHMA and the strategic allocation proposed at RAF Cosford with high quality sustainable transport connections to both.

5. Albrighton Place Plan Area

Policy S1.1: Development Strategy, Albrighton Key Centre

5.1 Vistry consider that as drafted, the draft Plan is not sound in relation to the Albrighton Place Plan Area for the following reasons:

- As set out throughout these representations, while Policy S1.1 recognises the importance of the strategic allocation of RAF Cosford and the opportunities it presents, the plan does not propose to fully realise them, particularly delivering new homes nearby to meet this significant economic growth.
- As set out in response to Policy SP2, the draft Plan fails to recognise the inherent sustainability of Albrighton and years of suppressed housing growth which have led to an ageing population, rising housing prices outstripping the Shropshire average, and an inability for first-time buyers to get onto the housing market.
- To remedy the above a greater quantum of growth should be allocated at Albrighton to ensure the plan can be found sound.
- In addition to the above, a disproportionately small amount of safeguarded land is proposed at Albrighton in contrast to other villages in the same tier of the settlement hierarchy (as we have set out at **Section 3** in response to policy SP11). To remedy this a greater quantum of safeguarded land should be proposed at Albrighton.
- At the same time, there is significant concern regarding the suitability of the sites proposed for safeguarding at Albrighton, which we elaborate on further below.

Proposed safeguarded site P35

5.2 Vistry is concerned that proposed safeguarded site P35 will significantly alter the form and character of Albrighton. The site is on the periphery of the village and any development will materially change gateway views on a key approach route into the village, impacting upon the setting of the Albrighton Conservation Area, within which part of the site is located. The Council's Green Belt Assessment (September 2017) assesses a wider parcel of land to the south and east of Albrighton which includes P35. In the assessment of this parcel, it is considered that the Green Belt in this location is relatively open *"with the openness of the land playing a major role in its setting"*¹. Indeed the Green Belt Assessment considers that *"the openness of the land within the parcel is considered to contribute positively to the historic significance of Albrighton and to its special character"*².

5.3 The topography of P35 plays an important role in enclosing the village from the surrounding countryside. Development here would be prominent on the rising slope when approaching Albrighton along Kingswood Road from the southeast. Works to

¹ Shropshire Green Belt Assessment – Final Report (September 2017) Page 166

² Shropshire Green Belt Assessment – Final Report (September 2017) Page 166

High House Lane or Kingswood Road necessary for development would adversely affect their rural character, views experienced from them, and is likely to result in the loss of mature vegetation.

- 5.4 In addition the gross site area identified within Site P35 (some 6.3ha) includes approximately 14 existing dwellings in separate land ownership to the wider site. It is not clear if these dwellings would form part of any future development at the site, should it come forward following its removal from the Green Belt.
- 5.5 Furthermore, the Council's SA is overly simplistic in respect to the proposed safeguarded sites and does not provide a robust appraisal of accessibility. The SA fails to consider sustainable travel options of bus and train and instead focuses on a simplistic approach of access to specified facilities (primary school, GP surgery, library, leisure centre, children's playground, outdoor sports facility, amenity green space and accessible natural green space).
- 5.6 For example, the SA identifies that site P35 is within 480m of a Primary School, GP Surgery, Library, Leisure Centre and Outdoor Sports Facility. This is not correct. Using the Council's methodology of measuring a straight line from the boundary of the site, the distances are:
- Primary School, 510m;
 - GP Surgery, 650m; and
 - Library, 980m.
- 5.7 When the actual walking / cycling distances are considered, the distances are all well in excess of 1km from the site. The straight line distances used by the SA are therefore not a robust measure of a site's sustainability. In addition, it is not just length of route which should be considered, but also its quality. Site P35 is disconnected from Albrighton and there are currently no safe routes for pedestrians to access the facilities of the town or public transport facilities.
- 5.8 Proposed safeguarded site P35 is therefore not a suitable site for future housing development and should remain in the Green Belt. For it to be released from the Green Belt as safeguarded land is not justified, it will render the plan unsound.

6. Conclusion

- 6.1 Vistry welcomes the opportunity to engage with the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.
- 6.2 As set out within these representations, it is considered that as currently drafted the plan is not justified and does not meet the tests of soundness in respect of the following areas:
- The County can accommodate a higher level of growth and assist in meeting the unmet needs of the Greater Birmingham and Black Country HMA, with which both Shropshire as a whole and in particular Albrighton are identified as having strong functional housing market relationships.
 - The level of growth directed to Albrighton (500 dwellings) is not reflective of its inherent sustainability, accessibility, relationship with the Greater Birmingham / Black Country HMA, and proximity to the proposed strategic employment site at RAF Cosford. This compounds years of suppressed housing growth which have led to an ageing population, rising housing prices outstripping the Shropshire average, and an inability for first-time buyers to get onto the housing market.
 - With the full extent of growth at RAF Cosford not yet fully realised, the potential increased need for market and affordable housing within close proximity to RAF Cosford is not yet known and it is a significant risk to both the success of RAF Cosford, and the creation of sustainable communities. This risk is heightened by the inability for windfall sites to be able to be delivered in Albrighton given its location inset within the Green Belt.
 - Furthermore, Vistry consider that safeguarded site P35 is not suitable or justified for development.
- 6.3 Vistry consider that In order for the plan to be found sound at examination, the Council should as a minimum allocate additional growth to Albrighton including our client's site to the east of Newport road for residential development of approximately 220 homes to assist in delivering much needed market and affordable dwellings to account for past suppression of delivery, and meet future, growing needs associated with the Strategic Allocation of RAF Cosford. Additional growth should also be supported by additional sites safeguarded for development to meet housing needs beyond the identified plan period.
- 6.4 Vistry would welcome the opportunity attend the examination hearing sessions to discuss the issues we have identified above which affect the soundness of the plan.
- 6.5 We would welcome the opportunity to meet with the Council to discuss further the opportunity for new homes at the site and the evidence base that has been submitted with these representations, which demonstrates the sustainability and deliverability of the site.

Appendix 1: Vision Framework

Land East of Newport Road, Albrighton

Vision Framework

Prepared on behalf of Bovis Homes Limited

January 2019



Turley

Contents

1. Introduction	03
2. Planning policy context	06
3. Site context	12
4. Site analysis	16
5. The opportunity	26
6. Key community benefits	32
7. Deliverability assessment	33
8. Summary and conclusions	34

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Introduction

01

This Vision Document has been prepared on behalf of Bovis Homes Limited in response to Shropshire Council's Local Plan Review 2016-2036. It seeks to demonstrate that land east of Newport Road is suitable, sustainable and deliverable and should be allocated for future development.

1.1 Shropshire Council is undertaking a partial review of the local plan in line with the requirements of the National Planning Policy framework ('NPPF'). The Council's preferred development strategy seeks to make the best use of Shropshire's location to support a sustainable pattern of growth during the period 2016 to 2036. The key proposals are:

- A total requirement for 28,750 dwellings to be delivered during the plan period, equating to 1,430 dwellings per annum;
- A net requirement for 10,347 dwellings to be delivered during the plan period; and
- A net requirement for around 80ha of employment development.

Spatial Framework

1.2 This document illustrates an indicative spatial framework plan which could form the foundation of future development proposals.

1.3 The spatial framework presented here has been generated in response to both strategic and site-specific considerations and observations, as well as a detailed appreciation of the site constraints and their effect on the development envelope. When the Site comes forward for development further appraisal will be required to guide the detailed layout of any development.

1.4 Notwithstanding, the document and the proposition it illustrates has been prepared with a diligence and robustness which provides plan-makers with the confidence that development in this location is a credible and compelling opportunity.

Scope

1.5 This document articulates;

- The potential - a broad summary of strategic policy drivers.
- The place - an appreciation of context and constraints.
- The opportunity - the spatial and placemaking opportunities presented by the Site.

The Site

1.6 The Site is set on gently undulating land to the north-west of Albrighton, immediately adjacent to the existing settlement boundary. The central and main part of the Site comprises three medium sized grazed pastoral fields. A smaller scale paddock is located to the north-west corner, north of Sandy Lane. The Site boundaries are formed by Newport Road to the west; a tree belt on the northern boundary of the nature reserve to the south; the West Midlands Railway line to the north; and, Rectory Road to the east. The latter is also a public right of way; part of the Monarch's Way long distance footpath. The whole site is located within the West Midlands Green Belt.

1.7 The Site's peripheral boundaries and the internal field boundaries are formed by maintained clipped native hedgerows. The north-east corner of the Site is set on the highest ground and allows for long distance views to the west and southwest.

1.8 The Site is located adjacent to the Albrighton and Donington Conservation Area which includes St Cuthbert's Parish Church, St Mary Magdalene Church, St Cuthbert's Well, Albrighton Pool and the Old Rectory. Both churches are grade II* listed buildings.

1.9 A red line plan showing the extent and location of the site can be seen on the adjacent page. The site measures 11.76ha.

The Team

1.10 This document has been informed by the following consultant team:

- Bovis Homes Ltd – Developer / Land promoter
- Turley – Planning, Design, Heritage, Landscape and Visual
- BWB – Ecology and Drainage
- DTA - Transport

Overview

1.11 This document demonstrates that land to the east of Newport Road, Albrighton is capable of accommodating a sustainable residential development to meet the clear, identified need for new housing within Shropshire. The Site is subject to technical constraints that can be appropriately mitigated (see Site Analysis section of this document and the accompanying Technical Reports).

1.12 The development would represent a logical expansion of the settlement and be consistent with the objectives of the emerging development plan document and its associated evidence base. The site is suitable, deliverable and achievable for housing development within the short-medium term, and as such should be supported within local policy.

1.13 Bovis is a national house builder with experience of delivering high quality housing sites. Bovis has a wealth of experience and resource to enable effective and proactive promotion of sites through the development plan process and planning application. With their consultant team, Bovis will seek to work closely with the Council, statutory consultees and

other stakeholders through the development plan process, and as 'deliverers' will ensure careful attention is given to viability and costs in plan-making.



Albrighton

Planning policy context

02

This analysis of planning policy has been informed by the aims of the National Planning Policy Framework (The Framework), the Shropshire Core Strategy (adopted March 2011), and the Site Allocations and Management of Development (SAMDev) Plan (adopted December 2015) and the associated evidence base documents.

National Planning Policy Framework

2.1 The Framework provides the over-arching context for the preparation of development plans and consideration for the future use of the subject site.

2.2 Allocation of the subject site in the emerging Local Plan Review 2016-2036 for housing development would comply with the key objectives of the Framework as outlined below.

Promoting sustainable development

2.3 The presumption in favour of sustainable development is central to the Framework's policy approach. In promoting sustainable development in the plan-making process, local planning authorities are required to positively seek opportunities to meet the development needs of their area (paragraph 11, NPPF)

2.4 Local Plans are the key to delivering sustainable development and should be prepared with that objective in mind. To that end, they should be consistent with the principles and policies set out in the Framework (paragraph 16).

2.5 It is clear from the Framework that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and significant weight should be placed on that objective through the planning system.

Plan-Making

2.6 Local Plans should be 'sound,' meaning that they should be positively prepared, justified, effective and consistent with national policy (paragraph 35)

Housing

2.7 Section 5 of the Framework emphasises the Government's objective of 'significantly boosting the supply of homes.' To achieve this, LPAs should:

- Establish a housing requirement figure for their whole area, which shows the extent to which their identified housing can be met over the plan period.
- Identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies (paragraph 73).

Sustainable transport

2.8 Section 9 of the Framework highlights the important role transport policies have in facilitating sustainable development and also in contributing to wider sustainability and health objectives and states that transport issues should be considered from the earliest stages of plan-making, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

2.9 Paragraph 103 goes on to state that ‘The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.’

Green Belt:

2.10 The Framework establishes that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. It sets out the five key purposes of the Green Belt as (paragraph 134):

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.11 Paragraph 135 sets out that new Green Belts should only be established in exceptional circumstances. Paragraph 136 develops this and sets out that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or review of the Local Plan. When reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development (paragraph 138).

2.12 Paragraph 139 sets out that when defining boundaries, local planning authorities should:

- Ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Development Plan

2.13 The development plan for Shropshire comprises the Shropshire Core Strategy (adopted March 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted December 2015).

Shropshire Core Strategy:

2.14 The Core Strategy is the principle development plan document and sets out how Shropshire is expected to evolve over the period 2011 to 2026.

2.15 The Core Strategy is split into five spatial zones. Albrighton is located in the ‘East Spatial Zone.’ The East Spatial Zone is located between Telford (a growth point) and the West Midlands conurbation (a focus for regional urban development) and is influenced by the Wolverhampton to Telford Technology Corridor.

2.16 Policy CS1 ‘Strategic Approach’ establishes that during the plan period (2006 to 2026), around 27,500 dwellings will be delivered. The policy establishes that Shrewsbury will be the focus of development, with the role of Market Towns and other Key Centres (which includes Albrighton) identified as being to maintain and enhance their traditional roles in providing services and employment and accommodating around 40% of Shropshire’s housing requirement.

2.17 The Policy map confirms that the site is within the Green Belt. Policy CS5 ‘Countryside and Green Belt’ sets out the development in the Green Belt will be strictly controlled.

2.18 Policy CS6 ‘Sustainable Design and Development Principles’ requires development to be well designed using high quality design principles, to achieve an inclusive and accessible environment which respects and enhances local distinctiveness and which mitigates and adapts to climate change.

2.19 Policy CS11 ‘Type and Affordability of Housing’ requires housing development to help balance the size, type and tenure of the local housing stock. Developments will be required to achieve an overall target of 33% local needs affordable housing, comprised of 20% social-rented and 13% intermediate affordable housing.

Site Allocations and Management of Development (SAMDev) Plan

2.20 The SAMDev Plan sets out proposals for the use of land and policies to guide future development in order to help deliver the Vision and Objectives of the Core Strategy.

2.21 MD1: 'Scale and Distribution of Development' builds on the policies set out in the Core Strategy and confirms that sufficient land will be made available during the remainder of the plan period up to 2026. The policy confirms that sustainable development will be supported in Shropshire.

2.22 MD2: 'Sustainable Design' sets out that for a development proposal to be considered acceptable, it is required to:

- Respond positively to local design aspirations;
- Contribute to and respect locally distinctive or valued character and existing amenity value;
- Embrace opportunities for contemporary design solutions;
- Incorporate Sustainable Drainage techniques;
- Consider design of landscaping and open space holistically as part of the whole development;
- Ensure development demonstrates there is sufficient existing infrastructure capacity; and
- Demonstrate how good standards of sustainable design and construction have been employed.



Policy Analysis

2.23 Planning policy at all levels directs new housing development to sustainable locations that are well served by public transport and are in close proximity to jobs and services. The suitability of Albrighton to accommodate additional development has been recognised by the Council through its position in the hierarchy which identifies it as a Key Centre.

2.24 Shropshire Council is current preparing its Local Plan Review, which will replace the adopted Core Strategy and SAMDev Plan. This will ensure the development plan remains up to date and responds to the current national planning policy context, as well as the most up to date evidence. It will also enable the county to meet its ambitious growth aims.

2.25 The Local Plan Review identifies a gross requirement for 28,750 dwellings during the plan period 2016 to 2036. Taking into account historic completions and existing commitments and allocations, the net requirement during the plan period is 10,347 dwellings across Shropshire.



Development of the scale proposed for land to the east of Newport Road, Albrighton, must be based on a sound appreciation of context.



Wider Context

3.1 With a population of circa 4600 (2011 Census), Albrighton is one of the largest settlements in east Shropshire, being defined as a “Market Town and Key Centre” in the Shropshire Core Strategy (2011). The village benefits from a strategic location roughly 10km from both Wolverhampton City Centre to the south-east and Telford to the north-west.

3.2 Albrighton has excellent accessibility to the strategic road and rail network with Junction 3 of the M54 located approximately 3km to the north (from the centre of the village). To the east, the M54 joins the wider strategic road network at the M6. The A41 runs to the north and links Albrighton to Wolverhampton, the M54 and Newport. West of Telford, the A41 becomes the A5 to Shrewsbury and onward through Wales to Hollyhead.

3.3 Approximately 10km west of Albrighton at Junction 2 of the M54, is i54 South Staffordshire, a 239-acre (98 hectare) UK technology-based business park. Major occupiers include Jaguar Land Rover, Moog, Eurofins and ISP. Nearby is the former Royal Ordnance Factory (ROF) Featherstone site on Cat and Kittens Lane South. South Staffordshire Council has identified the site as one of its four Strategic Employment Sites, along with an extension to i54, offering the potential to create up to 2,500 new jobs.

3.4 Albrighton train station is served by West Midland services which operate hourly, Monday to Saturday between Birmingham, Wolverhampton, Telford and Shrewsbury and by Arriva services which operate two-hourly on Sundays.

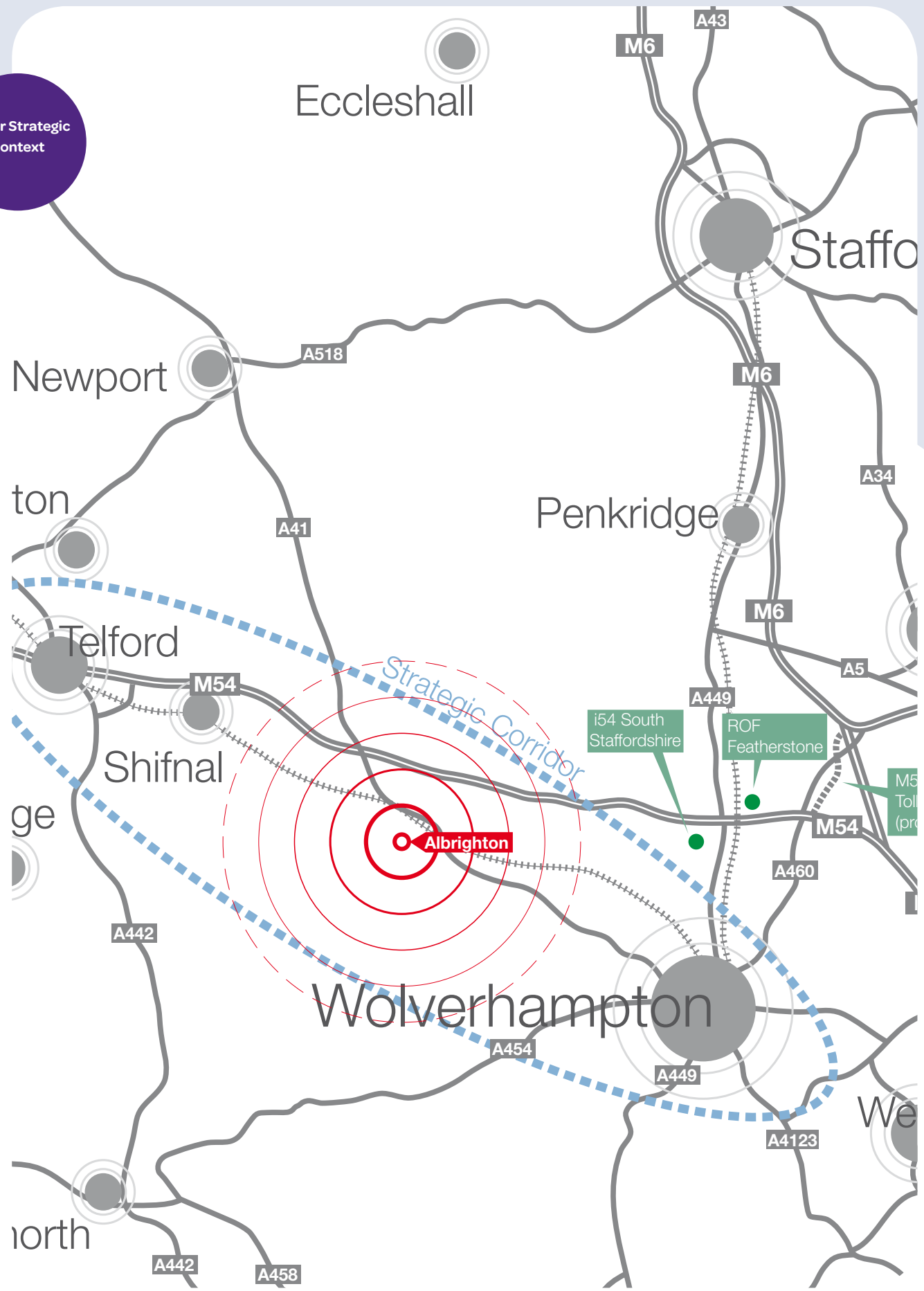
Site Location

3.5 The Site is located to the east of Newport Road, adjacent to the existing built up area of Albrighton. It is bounded by Newport Road to the west, the railway to the north and Rectory Road to the east. Sandy Lane runs through the northern area of the Site connecting Newport Road to Rectory Road although in parts it is an unmade track.

3.6 The Albrighton and Donington Local Nature Reserve lies directly to the south of the Site set within a small, shallow wooded valley. It contains a historic pool, Willow Carr woodland, a series of ponds and informal pathways running through areas of woodland and meadow.



Wider Strategic Context



3.7 The Site also falls adjacent to the Albrighton and Donington Conservation Area which includes St Cuthbert's Parish Church, St Mary Magdalene Church, St Cuthbert's Well, Albrighton Pool and the Old Rectory. Both churches are grade II* listed buildings.

3.8 Albrighton historically grew around St. Magdalene Church (dating from 1181) and the principal routes into the village; High Street, Cross Road and Station Road. Rectory Road is a public right of way: part of the Monarch's Way long distance footpath. This promoted route is said to relate to an escape route taken by King Charles II after the battle of Worcester and runs from Worcester via Bristol and Yeovil to Brighton, with a short detour into Shropshire. The village grew significantly during the 1950s/60s with new housing estates developed to the north as well as the construction of the Albrighton bypass (A41).

3.9 RAF Cosford (and the adjacent Royal Air Force Museum) is located 1.5km to the north-west and provides training and accommodation to a significant number of military personnel.

3.12 Albrighton has very good public transport services. There are currently three bus services which serve Albrighton, providing frequent services to local higher order settlements including Telford and Wolverhampton. All three services run along the site boundary with Newport Road and serve the existing stops near to Worthington Drive.

3.13 Albrighton and Cosford train stations are both within walking and cycling distance of the site (1.3km and 0.9km away respectively). Both stations are served by West Midland services which operate hourly, Monday to Saturday between Birmingham, Wolverhampton, Telford and Shrewsbury and by Arriva services which operate two-hourly on Sundays. From Cosford train station, Telford is 11 minutes, Wolverhampton 17 minutes, Shrewsbury 33 minutes and Birmingham 35 minutes. As part of its new franchise West Midlands Railway has committed to investing £1billion in the network, including more trains between Birmingham and Shrewsbury with two services per hour from December 2018, as well as a new service on a Sunday

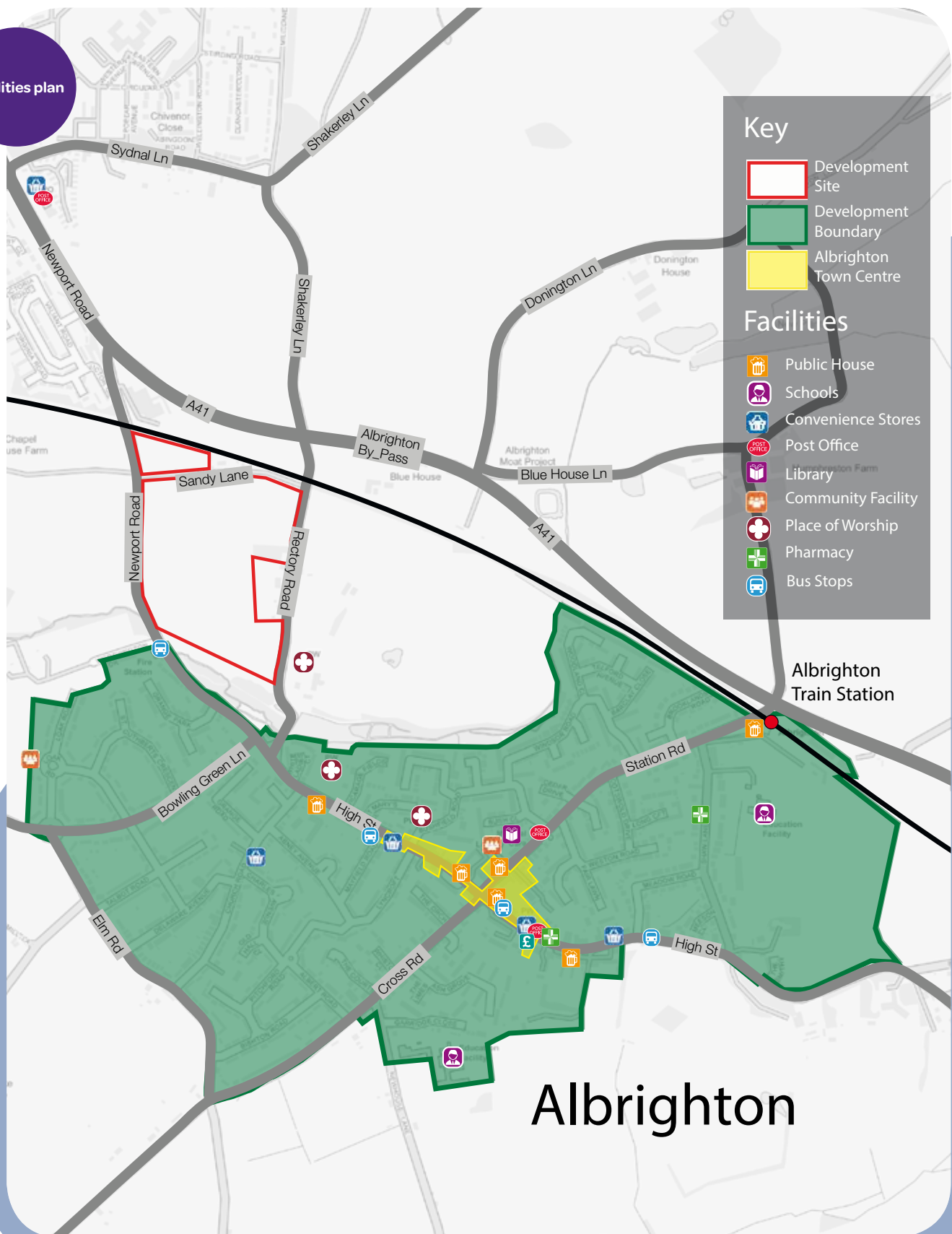
Facilities and amenities

3.10 Albrighton is a very sustainable location with a wide range of local shops, restaurants, facilities and services. These are mainly centred on the High Street and can be easily reached by a range of means including conveniently by foot and cycle.

3.11 The village supports two primary schools (St Mary's CofE off Shaw Lane and Albrighton Primary on Newhouse Lane) and a preparatory school. The village centre offers a range of local shops and services including a post office, bank, Co-op and Spa supermarkets. Leisure and community facilities within the village include two churches, a village hall, library, social club, public houses/bars, and recreation facilities including sports pitches, allotments, and a bowling club. Health services include a medical practice, dentist, pharmacy and optician. A small business park is located on the eastern edge of the village, close to the railway station.



Facilities plan



Key

- Development Site
- Development Boundary
- Albrighton Town Centre

Facilities

- Public House
- Schools
- Convenience Stores
- Post Office
- Library
- Community Facility
- Place of Worship
- Pharmacy
- Bus Stops

Albrighton

Site analysis

Technical assessment

04

A series of technical studies have been undertaken to inform the emerging proposals for the Site and support its allocation for residential development.

4.1 This section summarises the key technical considerations for the site.

Landscape

4.2 High level landscape and visual analysis has been carried out by a chartered landscape architect from Turley Landscape and VIA to identify the existing landscape features, landscape character and key visual receptors of the Site. The likely landscape and visual opportunities and constraints which affect the Site's ability to accommodate residential development have also been considered.

4.3 The whole site is located within the West Midlands Green Belt; this does not provide an indication of landscape value but considers the openness of the land as an essential characteristic of the Green Belt. In the Shropshire Landscape Character Assessment (2006) the Site falls within the 'Sandstone Estatelands' which are described as "gently rolling, open landscapes formed over Permo-Triassic sandstones". The Site contributes to the described characteristics of gently rolling, open fields with a regular field pattern (although analysis of historic OS maps demonstrates that the internal field structure has been altered over time). Large scale development associated with RAF Cosford is present to the west of the Site and has reduced the rural character of the Site to some extent.



Landscape Features

4.4 The Site contains grazed pastures set on gently undulating land to the north-west of Albrighton. The eastern boundary of the Site partly runs alongside Rectory Road which is also part of the Monarch's Way long distance footpath. This promoted route is said to relate to an escape route taken by King Charles II after the battle of Worcester and runs from Worcester via Bristol and Yeovil to Brighton, with a short detour into Shropshire. There is a strong rural character to the narrow Rectory Road as you approach Albrighton and Donington from the north which should be preserved within any development proposals. The Site and its immediate surroundings are not covered by a landscape designation. However, a number of attributes are present which contribute to its value locally. The landscape is in good condition with well-maintained hedgerows and is actively farmed. It is adjacent to the existing settlement edge and contributes to the landscape setting of the village.

Key Visual Receptors and Views

4.5 The extent of visibility of the Site is limited by its topography and the influence of surrounding mature vegetation and built form. Although the Site provides long distance views out to the surrounding landscape, there are limited publically accessible viewpoints, providing views of the Site, beyond the immediate context. This is primarily due to the vegetation associated with the railway line and A41 to the north, the large army barracks and buildings associated with RAF Cosford to the west and the woodland associated with the Albrighton and Donington Local Nature Reserve to the south. The latter of these provides containment to the surrounding village.

4.6 The key visual receptors in close proximity include the roads that surround the Site's boundaries; Monarch's Way; Albrighton and Donnington Local Nature Reserve; Newport Drive and sports fields; and, residential properties associated with Sandy Lane and Rectory Road. From St Cuthbert's Church the views from the churchyard and entrance path are filtered by mature trees including some evergreen species. Although views are possible of the Site's southern field, the intervening trees prevent there being clear vistas albeit the connection with the surrounding rural landscape is recognised in the conservation area appraisal. The northern part of the Site has a greater visual association with the wider countryside. The views from the northeast corner of the Site extend to distinctive hills including the Long Mynd and the Wrekin which are part of the Shropshire Hills AONB.

Landscape Capacity and Design Principles

4.7 Proposals to accommodate development on the Site will need to be landscape-led to ensure potential landscape and visual effects are minimised. A number of design principles have been incorporated into the emerging layout to help reduce the 'impact of change' on the surrounding area's landscape character and visual amenity.

- Northeast and northwest fields proposed to be kept free form development and retained in agricultural use to preserve a rural fringe to the settlement; set development back from the rural approach to the village on Rectory Road; and preserve some open land between Albrighton and RAF Station Cosford.
- Existing hedgerows to be retained within the layout and strengthened where required with development set back from these features to preserve their condition.
- Development to be set within generous areas of open space to help contain the development and reduce the massing of built development at the settlement fringe. This should be supported by incorporating tree planting within the layout to increase the species diversity within the Site and assist with integrating the development into the landscape.
- Informal church green to be created in the southeast corner of the site adjacent to the church to reduce the effect of built development on views from the Monarch's Way and St Cuthbert's Parish Church.



**View across site from
north-east corner**

- Landscape buffer to be included along the southern edge of the Albrighton and Donington Local Nature Reserve to ensure that development is set away from root protection areas and does not impact on the network of habitats. Existing vegetation to the southern boundary of the Site to be strengthened to reduce the influence of built form in views from the nature reserve.
- Positive frontage to be provided along Newport Road to enhance the village approach from the northwest.
- The high quality development needs to provide a sensitive response to the landscape setting and reflect the character of the village. Residential properties should be predominantly 2 storeys with a variation of building types to add visual interest and enhance the character.

4.8 The Site is located adjacent to the existing settlement boundary of Albrighton and is seen in the urban context of the village. It is also well contained within the wider landscape. By creating a robust landscape framework that incorporates generous areas of open space and buffer planting, the impact on the rural character of landscape would be reduced and the influence of built development on views from nearby receptors would be minimised.

View across
the Site from
Newport Road



Ecology

4.9 A desk based search showed that there were no European or National statutory designated sites within the search area. However, a search using MAGIC identified a single Local Nature Reserve (LNR) running adjacent to the southern boundary of the site; Donington and Albrighton is a local nature reserve being a valuable site for wildlife and recreation in Shropshire. There is potential for the nature reserve to be impacted upon by an adjacent development, however the development proposals include a minimum 10m buffer to the reserve which would minimise the potential for impacts.

4.10 St. Cuthbert's Meadow is the main part of the reserve, and is mostly used as a recreational area. The St. Cuthbert's well is surrounded by older trees like Beech, Hazel, but most noticeably Old Yew. These mature trees make it an important area for nesting birds. The reserve contains the Donington Pool which is a waterbody providing valuable habitat for breeding wildfowl. At the far side of Donington Pool is a willow carr woodland area, with streams and marshes.

4.11 A large proportion of the Site comprises arable fields i.e. turnip fodder crop grazed by sheep. Other than the turnips, the fields contain limited vegetation and much of the fields are heavily poached by sheep, which extend to the hedgerow bases in some cases. Poor semi-improved grassland is also present on Site i.e. horse grazed pasture.

4.12 A total of 13 hedges were recorded on the Site. These form the boundary of the fields, including a double-hedge either side of Sandy Lane, which is a public footpath. All of the hedges are mature, and predominantly dominated by hawthorn with varying amounts of other typical hedgerow species such as English elm, holly, elder, field maple and yew. Two hedgerows consist of a row of alder which has been topped. Standard trees are scattered throughout the hedgerows and consist primarily of sycamore, oak and ash.

4.13 The hedgerows provide optimal habitat for breeding birds, and wintering birds such as winter thrushes. Dependant on the use of the field interiors, the Site has potential to support farmland birds of conservation concern. This would be more likely if the fields contain cereals during the spring/ summer months.

4.14 A line of trees is present along the railway embankment, consisting of mature willow, oak, sycamore, cherry and hawthorn. A row of 10 mature trees, primarily Oak, are located along the eastern boundary of the lower half of the Site. Many of the trees are ivy clad and show evidence of decay/rot holes.

4.15 It is possible that great crested newts may breed in the vicinity of the Site. The majority of the Site, namely the field interiors, do not provide suitable habitat for amphibians with the exception of the grassland areas. The hedgerows may provide commuting or refuge areas for amphibians where within 250m of a breeding pond.

4.16 The Site has potential to support foraging bats and may have potential to support bat roosts within the large mature trees on Rectory Road. Hedgerows will be retained as part of the development in addition to the mature trees.

4.17 No confirmed badger setts were identified during the survey, however evidence indicated that badgers use the Site as part of their territory. It is possible that outlier setts could be located underneath the wider hedgerows, however it is unlikely that a larger sett, such as a main sett, would be located within the boundary of the Site. Provided that good working practices are adhered to such as covering trenches overnight, impacts to badgers are considered unlikely. There is a risk of small setts being located within the wider hedgerows; a badger survey will be undertaken to allow a more comprehensive understanding of the Site's use by badgers. However, based on the current findings no significant impacts are envisaged.

4.18 No rare or notable botanical species were found. The majority of the Site does not represent habitats of conservation value, however, a number of the hedgerows may qualify as Important Hedgerows. The vast majority of hedgerows would remain intact, and, in some cases, be enhanced as part of the current proposals.

4.19 The risk of harm to amphibians, in particular great crested newts, is considered to be low, due to the lack of significant suitable habitats and distance from potential breeding ponds. The nature reserve pond is thought to contain fish and is therefore unlikely to support great crested newts; this will be confirmed with an eDNA survey.

4.20 The Site provides optimal nesting habitat for birds, primarily within the hedgerows and trees. Any works to clear vegetation in suitable bird breeding habitats on the Site will be undertaken outside the breeding bird season therefore no impacts to nesting birds are envisaged.

4.21 There is potential for bat roosts within the mature trees on Rectory Road. However, there will be a buffer to these trees in the final masterplan therefore impacts are unlikely. Hedgerows will be retained as part of the development in addition to the mature trees. Light spill into these areas with an appropriate lighting strategy therefor impacts are unlikely.



Access

4.22 The NPPF is predicated on the assumption that new developments are located in areas that provide people with a choice of travel modes and are able to provide safe and suitable access for all. There is also a presumption that new developments should only be resisted on highways and transportation grounds when it can be demonstrated it will lead to a severe impact upon the local transport networks. Having regard to these tests, an overview of the transportation merits of the Site is provided below.

4.23 Albrighton has very good public transport services, both bus and rail. As such the site location compares very favourably to many locations within or adjacent to much larger centres in terms of the frequency and range of destinations that can be easily reached.

4.24 Accessibility to bus services is very high with the closest bus stops located directly opposite the Site around Worthington Drive. These stops are served by routes with a 30 minute inter-peak frequency to the nearby higher order towns and cities including Telford and Wolverhampton. Whilst these stops are basic in terms their existing provision, they could be readily enhanced with seating or information panels as part of the development. The existing stops are within the recommended guidelines of 400m of the whole of the Site. However, further stops could be provided to the north in positions of higher conspicuity for residents. Due to the geography of the site there is no need to bring services into the site. To ensure good access to public transport to and from the site, direct and convenient pedestrian links to the existing bus stops will be provided from within the Site.

4.25 In terms of rail access, both Cosford Train Station and Albrighton Station are within walking and cycling distance of the Site. Both stations are served by West Midlands Railway services which operate hourly, Monday to Saturday between Birmingham, Wolverhampton, Telford and Shrewsbury and by Arriva services which operate two-hourly on Sundays. Cosford Station is the nearest of the two stations, located approximately 900m (straight-line) from the Site. Walk times would be around 15-20 minutes (5 minute cycle ride).

4.26 Albrighton is a very sustainable location with a wide range of local shops, facilities and services. These are mainly centred on the High Street and can be easily reached by a range of means including conveniently by foot and cycle. Moreover there are a significant number of trips that are likely to be local as the majority of the community is within a 20 minute walk of the Site.

4.27 The Site will be served from a new access onto Newport Road. A separate emergency access will also be provided onto Newport Road to the north of the main access. The main access into the Site will take the form of a simple priority junction and will be fully compliant with current highway design standards. It has been located towards the southern end of the Site's frontage onto Newport Road which is subject to a 30mph speed limit. There is no reason however why the speed limit should not be moved further north and this would assist in the establishment of a further bus stop to the north and the additional pedestrian crossing demand that would generate. This will be explored further with the highways authority.

4.28 The local road network is of a good standard including the junction of Newport Road and A41. No significant works should therefore be required to accommodate the development. This will be confirmed with detailed modelling at planning application stage. The quantum of development being promoted at the Site is unlikely to generate a level of traffic that would result in a material impact upon the local highway network. During peak hours, it is expected that the Site will generate of the order of 120 vehicles per hour or around 2 vehicles per minute. The majority, 80-90%, of this demand will be to the north, to the A41. As such there will be very little additional traffic within Albrighton (which is a significant advantage of this site over expansion to the south or east). The Site will therefore provide additional support for local services and facilities without build-up of extraneous traffic in the centre of the community.

4.29 The traffic impact further afield will need to be considered in more detail at the planning stage however it is clear that the existing junction with the A41 has been designed to a high standard, consistent with contemporary design guidance and the safety performance of this junction is excellent as is apparent from the low number of reported accident over the most recent five year period (source: www.crashmap.co.uk which presents official DfT published statistics).

Flood risk and Drainage

Flood Risk

4.30 The proposed development site is shown to be located almost entirely outside the floodplain of the Albrighton Brook as shown on the Environment Agency Flood Map for Planning. A small area within the south west of the Site is located within the high risk floodplain (Flood Zones 2 & 3). These zones are identified as land assessed as having between a 1 in 100-year [1 in 200-year tidal] and a 1 in 1000-year or greater annual probability of river/tidal flooding, and land assessed as having a 1 in 100-year or greater annual probability of river flooding and/or a 1 in 200 year probability of flooding from tidal sources, respectively. The proposed built development will be located entirely in Flood Zone 1 on the Site. No other form of flooding (groundwater, sewer, surface water, canal and reservoir) is considered to pose a notable risk.

Existing Surface Water Drainage

4.31 The entire site is greenfield in nature and is considered to drain via a combination of natural infiltration and surface water runoff into field ditches which run in the hedgerows which bound the Site. On review of contours the Site can be divided in three principal catchment areas: the north-east catchment falls relatively steeply to the west from Rectory Road with differences across this section of the Site of approximately 8m; the central area in the southern section of the Site is shown to form a relatively flat or slightly sloping plateau, with levels falling away toward the Albrighton Brook in the extreme southern section of the Site. The northern most section of the site falls away to the north, with a farm track running east-west in the northern parcel forming a ridge line.

Proposed SuDS Strategy

4.32 It is proposed to restrict runoff from the development to the equivalent greenfield runoff rate (QBAR), thus preventing any increase in flows leaving the site. Attenuated storage will be provided in the form of SuDS, (Sustainable Drainage Systems). A SuDS strategy will be implemented to treat the runoff from the development; furthermore, the proposed surface water draining will ensure there is no increase in flood risk elsewhere as a result of the development as required by Local Authority and National Government planning policy. As the underlying strata is likely to permit infiltration, this will be pursued as the preferred method of surface water discharge.

Heritage

4.33 An Initial Desk-Based Heritage Appraisal has been prepared which identifies a number of heritage assets to the south east of the Site that will potentially be affected by the future development of the Site.

4.34 It is considered that the assets which have potential to be affected are:

- The Church of St Cuthbert (grade II* listed)
- Churchyard Cross about 10 metres south of the tower of the Church of St Cuthbert (grade II* listed and a Scheduled Ancient Monument)
- Chest Tomb approximately 10 metres north of the chancel of the Church of St Cuthbert (grade II listed)
- The Donington and Albrighton Conservation Area.

4.35 St Cuthbert's Well (grade II listed) is a natural spring situated in the valley to the south of the Site. This area is tightly enclosed by dense tree cover, with no views out. It is not considered that development of the Site would affect the significance of the listed well.

4.36 At present the Site forms part of the wider rural setting of these heritage assets. There are views from the churchyard to the west, across the Site and views of the Church from the Site which contribute to the significance of the Church and the associated assets. There are also views along Rectory Road which contribute to the rural character of the Donington and Albrighton Conservation Area and to the significance of St Cuthbert's Church as a rural, medieval Parish Church.

4.37 It is considered that any potential impact to heritage assets caused through the development of the Site would be less than substantial which, in line with paragraph 134 of the NPPF, should be weighed against the public benefits of the proposals.

4.38 There are opportunities to mitigate the potential impact through design strategies to ensure any impacts are minimal. These include drawing development back from the conservation area boundary, providing visual and physical buffers and retaining existing hedgerows.

Technical summary

4.39 Based on the technical information provided, no constraints have been identified which would inhibit development of the Site for residential and associated community uses. The following summaries can be drawn:

Landscape

4.40 The Site has a largely rural character, comprising grazed pastures set on gently undulating land to the north-west of Albrighton. The whole site falls under Green Belt designation. The Site and its immediate surroundings are not covered by a landscape designation. However, a number of attributes are present which contribute to its value locally including: well maintained boundary hedgerows; historic field patterns; long distance views to AONB; and some visual associations with the adjacent Albrighton and Donington Conservation Area and St Cuthbert's Church.

4.41 There are limited publically accessible viewpoints, providing views of the Site, beyond the immediate context. The extent of visibility of the Site is limited by its topography and the influence of surrounding mature vegetation and built form. The key visual receptors in close proximity include the roads that surround the Site's boundaries; Monarch's Way; Albrighton and Donnington Local Nature Reserve; Newport Drive and sports fields; and, residential properties associated with Sandy Lane and Rectory Road. From St Cuthbert's Church the views from the churchyard and entrance path are filtered by mature trees including some evergreen species.

Ecology

4.42 There are no European or National statutory designated sites within the search area. Donington and Albrighton is a local nature reserve being a valuable site for wildlife and recreation in Shropshire. Any potential impacts on the nature reserve can be minimised by providing an appropriate landscape buffer along the southern edge of the development Site.

4.43 No rare or notable botanical species were found. The majority of the Site does not represent habitats of conservation value, however, a number of the hedgerows may qualify as Important Hedgerows. The vast majority of hedgerows would remain intact, and, in some cases, enhanced as part of the current proposals. The risk of harm to amphibians, in particular great crested newts, is considered to be low, due to the lack of significant suitable habitats and distance from potential breeding ponds. Whilst potential exists for bat roosts within the mature trees on Rectory Road, there will be a buffer to these trees in the final masterplan therefore impacts are unlikely.

Access

4.44 The Site is well situated to ensure the sustainability requirements of the NPPF are met. It is also possible for a future development to provide a safe and suitable access strategy. On this basis, it is considered that there are no highways and transportation reasons to preclude this site from development.

4.45 It is however acknowledged that there will be a need to undertake detailed junction modelling assessments in the future in order to ensure that the traffic generated by the proposals can be satisfactorily accommodated on the local highway network. This work would be developed in conjunction with the local highway authority, and where necessary, identify potential mitigation measures.



Flood risk and Drainage

4.46 A review of the Environment Agency's records reveal that the majority of the Site, with the exception of small area in the south-west, is located within Flood Zone 1 and is therefore considered to be at low risk of flooding from river or tidal sources. No other form of flooding (groundwater, sewer, surface water, canal and reservoir) is considered to pose a notable risk.

4.47 The inclusion of a suitable provision of SUDs across any proposed development will protect both the proposed development and neighbouring properties dwellings from the potential of flood risk as required by Local Authority and National Government planning policy. It is proposed to restrict runoff from the development to the equivalent greenfield runoff rate (QBAR), thus preventing any increase in flows leaving the Site.

Heritage

4.48 Whilst impact has been identified to a number of designated heritage assets, it is considered that any impacts would be less than substantial. As the design process evolves specific design strategies will be used to ensure that any impacts are minimised. Mitigation measures may include drawing development back from the conservation area boundary, providing visual and physical buffers and retaining hedgerows. The development will also be designed in such a way as to retain the existing rural character of Rectory Road.







The opportunity

This section focuses on our vision for a high quality, landscape-led residential development on the site at Newport Road.

The opportunity 05

Building a Framework - Key Steps

5.1 Site principles can be applied to create a more specific spatial framework for the Site. We believe that the spatial structure can respond to key opportunities and drivers offered by the Site and its context to create a responsive and sustainable place.

Step One: Retaining assets and designations

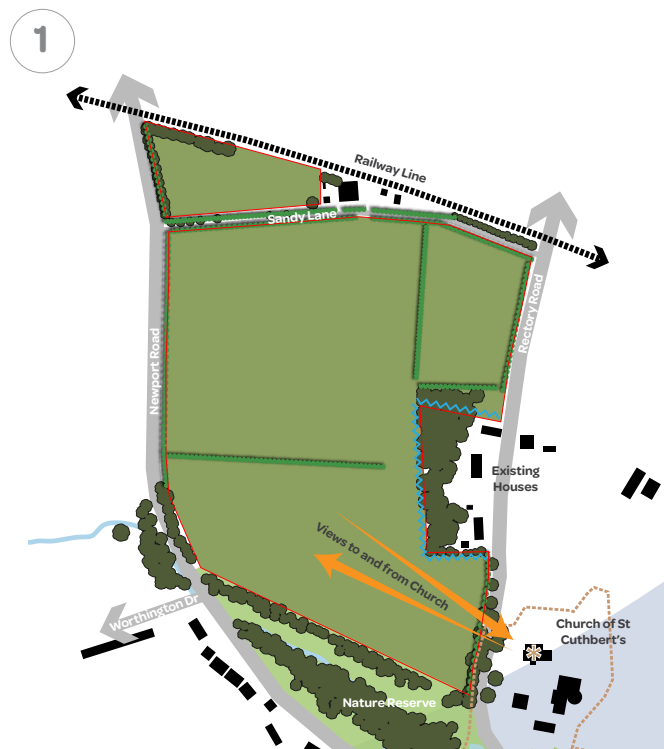
5.2 Retain and enhance where possible the existing natural assets of the Site, creating an underlying landscape framework for the proposals to ensure that the new development integrates into its natural and built context. This includes:

- Donington and Albrighton Conservation Area
- Existing trees
- Existing hedges along field boundaries
- Donington and Albrighton Local Nature Reserve
- Existing property boundaries along the site edge

Step Two: Defining a developable area

5.3 The built form is set back from the south-east corner to provide a visual and physical buffer between the development and the Church. Development offsets are provided around the site edges and adjacent to retained hedgerows. A green buffer is proposed along the interface with the nature reserve that will provide a focus for new tree planting and other ecological enhancements. This also allows the opportunity to provide a permanent community building close to the nature reserve for use by volunteers and to host educational visits.

5.4 The highest and most visually sensitive part of the Site at the north-east corner is retained in agricultural use to preserve long distance views. Land to the north of Sandy Lane closest to the railway line is also retained for grazing.



Step Three: Responding to constraints

5.5 Swales and attenuation ponds are located appropriately for drainage requirements and follow the topography of the Site located in the lowest areas.

5.6 Development is drawn back from the sensitive interfaces with the nature reserve and conservation area and from the part of the Site located within the flood zone.

5.7 The existing hedgerow through the centre of the Site is retained with generous buffers provided either side to create a green link through the Site.



Step Four: Identifying access & connections

5.8 The main vehicular access into the Site is provided off Newport Road. The location of the proposed access ensures appropriate visibility splays can be provided both to the north and south without the need to alter existing speed restrictions. A secondary access for emergency vehicles is provided to the north of the main access.

5.9 Pedestrian linkages are provided onto Sandy Lane, Newport Road and Rectory Road in locations that will ensure convenient access to local destinations and facilities including Cosford, Albrighton Town Centre and the existing playing fields along Worthington Drive. New pedestrian links will also be provided that connect the Site with the existing footpath network within the Nature Reserve.

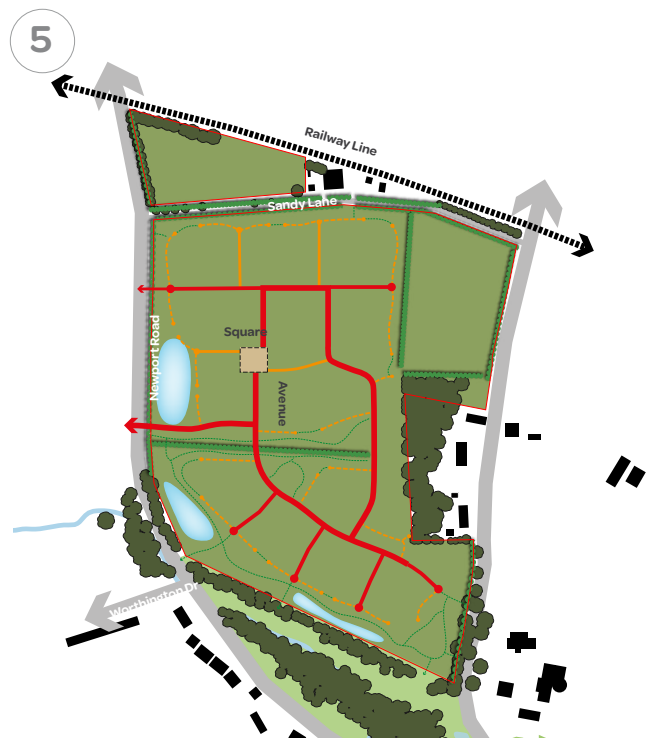


Step Five: A connected movement network

5.10 A logical street hierarchy will provide a legible and connected movement network. A tree-lined avenue forms a central loop road through the development and provides access into the Site from Newport Road. Views towards the Church are maintained along the axis of the Avenue and from the adjacent public open spaces.

5.11 A series of shared-surface lanes add character to the development and provide diversity to the street hierarchy. Paved private driveways around the site edges provide a softer transition with the adjacent open spaces and retained hedgerows. A hard landscaped square is proposed at a key intersection in the movement hierarchy and provides a focal point within the development.

5.12 A network of formal and informal pedestrian routes connect houses with areas of open space and provide a choice of routes through the development.



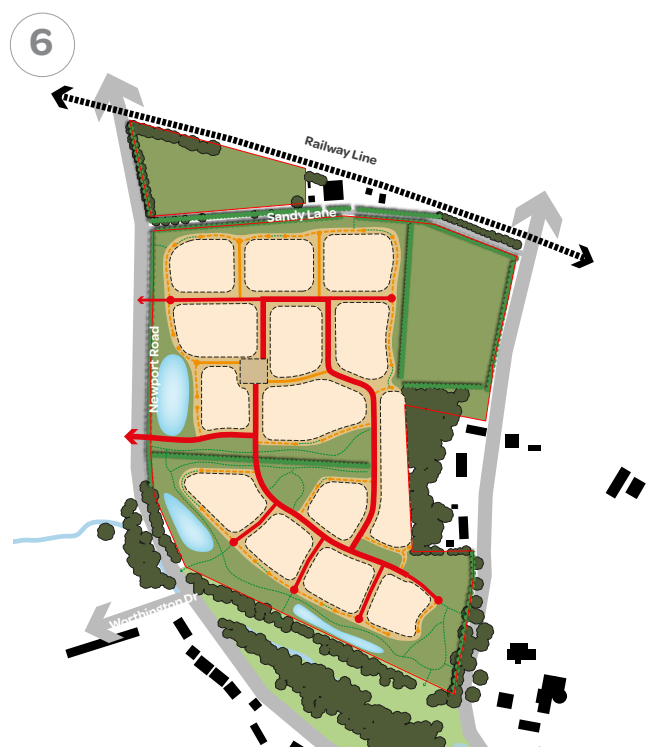
Step Six: Flexible, robust development blocks

5.13 Flexible block sizes provide the opportunity for a mix of housing typologies with clear access from proposed primary routes.

5.14 Green spaces are integrated into the block structure with buffer and landscape planting to both screen and provide accessible amenity space for both existing and new residents.

5.15 Block sizes are kept small to ensure a highly permeable layout with regular links through to the surrounding open spaces. A secure boundary is created to the existing houses along the eastern boundary with good separation distances ensuring privacy and amenity to these properties is maintained.

5.16 The key steps come together to create a layered but co-ordinated concept plan. This provides a vision of comprehensive development, but one that is built up by carefully considered steps.





PLAY

The Spatial Framework

5.17 The diagram describes a development structure that could potentially deliver circa 218 dwellings at a net density of up to 35 Dph. The framework has been drafted according to the following assumptions:

- The proposed housing mix will respond to local housing need and include a range of 2, 3 and 4 bedrooms homes and provision of local affordable housing.
- Housing will range in scale and height between 2 and 2.5 storeys. No building on the site will be taller than 2.5 storeys.
- Development density will reduce towards the northern and eastern boundaries to provide a softer transition with the rural northern edge and to respect the setting of the Conservation Area.
- Detail with regard to materials, planting etc. will be dealt with at the application stages of the planning process, although design details will seek to reflect the rural and historic character of the town.
- Any requirement for formal sports facilities will be met through a financial contribution from the developer in lieu of on-site provision.

5.18 The Spatial Framework Plan envisages a developable Area of 6.24 Ha. The remaining 5.52 Ha are to be retained in agricultural use or utilised as Public Open Space, landscape planting, on-site attenuation and access.

	Site boundary		Public Open Space
	Primary Road		Attenuation
	Secondary/Shared Streets		Indicative Building Plots
	Pedestrian Footway		Indicative Building Plots (Low Density)
	New/Existing Tree Planting		Play Area
	Community Building		Retained Hedgerow
			Square

Spatial Framework Plan

Newport Road



Sandy Lane



Rectory Road

Nature Reserve

PLAY

PLAY

POS

POS

POS

POS

POS

Key community benefits

06

6.1 The Site is capable of offering a combination of residential development, community uses and landscape to enhance the setting of the town. Development of the land would secure the following benefits:

- Housing Need – The Site is capable of delivering circa 218 homes at a density of up to 35 Dph, assisting in the delivery of new market and affordable housing that is capable of addressing local need in terms of type and tenure. The land can be brought forward for development in the short-medium term to make an important contribution towards the housing needs of the town and wider County.
- Housing Mix and Choice - the subject site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community. The new development would provide up to 33% affordable homes and a range of dwelling sizes (including 2 and 3 bedroom family homes).
- Open Space – new residential development will provide a strong landscape framework comprising new open space provision for formal and informal play and recreation providing opportunities embedded within green infrastructure. The residential development of the Site would include permeable and legible pedestrian and cycle routes, linking through to the adjacent residential areas of Albrighton.
- Promoting Healthy Communities – the Site is an ideal location for residential development, immediately adjacent to a vibrant and highly sustainable settlement and in close proximity to existing community facilities and services which are easily accessible by foot.
- Economy - The proposed development will provide a boost to the local economy, ensuring that the vitality of Albrighton and its community is enhanced. The development of the site for new housing will attract new households to the area with additional expenditure in the local economy that will stimulate additional demand in new and existing shops/services.

Deliverability assessment

07

7.1 Subject to the Site being supported by the Council, removed from the Green Belt and allocated for residential development, Bovis Homes will undertake a comprehensive engagement strategy with local stakeholders and the local community.

7.2 Further to the adoption of the Local Plan Review 2016-2036, Bovis Homes will commit to the early delivery of the Site via the planning application process to ensure that the Council is able to meet its locally identified housing needs.

Summary and conclusions

08

This Vision Document has been prepared by Turley on behalf of our client Bovis Homes. It supports and promotes the sustainability credentials of development on land to the east of Newport Road, Albrighton, in response to Shropshire Council's Local Plan Review 2016-2036.

8.1 Land to the east of Newport Road is the primary sustainable location for growth within the town and is capable of accommodating circa 218 new homes.

8.2 Through a robust assessment of the Site's policy, spatial and environmental context, it has been demonstrated that the Site is suitable and appropriate for future development. It also represents a deliverable and viable opportunity to provide sustainable housing growth within Albrighton and the wider east Shropshire area.

8.3 The analysis of the Site and subsequent development framework clearly illustrates how a sensitive, high quality development which responds to the attributes of the Site can be achieved.

8.4 In summary, this development framework has concluded the following:

- Policy Context – Development of the Site will support the five year supply and contribute towards the delivery of the Council's wider economic growth strategy and the creation of sustainable communities.
- Townscape and context – The Site represents a development opportunity close to both the historic core of the town but also in close proximity to a range of services and amenities. It is well contained and represents a very suitable and sensitive opportunity for new housing in line with sustainable growth patterns.
- Access – The Site benefits from good local and regional road links, benefits from regular bus connections to local centres and is in walking distance of a host of local services which helps promote sustainable movement patterns.
- The Site – The future development of the Site can be delivered whilst retaining and enhancing its specific landscape and ecological attributes. New areas of public open space can also be delivered through the release of the land for residential development.

8.5 It is therefore concluded that the Newport Road site is both suitable and appropriate for a sustainable, high quality development and can be delivered as a primary housing site early in the plan period.



For further information contact

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Appendix 2: Technical review on the need for new homes in Albrighton

Technical review of the need for new homes in Albrighton

Appendix to representations submitted on
behalf of Vistry Homes Limited

September 2020

Turley

Contents

Executive Summary	i
1. Introduction	4
2. Proposed Housing Growth in Albrighton and Shropshire	7
3. Shropshire’s Local Housing Need	10
4. Wider Context of Housing Need	19
5. A Connected Place – The M54/A5 Growth Corridor	23
6. Evidencing and accommodating future demand for housing in Albrighton	27
7. Conclusions	37

Client
Vistry Homes Limited

Our reference
BOVQ3007

September 2020

Executive Summary

1. This technical report has been prepared by Turley on behalf of Vistry Homes Limited to inform wider representations to the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan ('the Draft Plan') which the Council is consulting on until 30 September 2020.
2. The purpose of this report is to provide a technical evidence-based justification as to why the Draft Plan should provide for a greater level of housing growth in Albrighton. This recognises evidence of housing need in Shropshire and within the adjacent areas with which it has strong housing market relationships. It also recognises the locational attributes of Albrighton within the M54 Growth Corridor and the extent to which it can sustainably accommodate growth. The analysis in this report recognises and reinforces:
 - The clear direction provided by Government as to the importance of boosting the supply of housing as set out in the ongoing consultations with regards immediate and long-term changes to the national planning system;
 - The sustained ambitions of the Council to respond positively in providing for housing to meet local needs, with the Draft Plan continuing to provide for 1,400 homes per annum (30,800 homes between 2016 and 2038) thus exceeding the current outcome of the standard method (1,177dpa). It does, however, fall below the outcome of the revised method currently being consulted upon by the Government (2,129dpa);
 - The spatial distribution advanced by the Council, which recognises the scale and role of individual settlements – as evidenced through the hierarchy – and the importance of key centres such as Albrighton;
 - The positive implications of the Council's support for the regionally and nationally significant M54 Growth Corridor with regards Shropshire's economy and by implication the need and demand for housing in settlements along this corridor; and
 - The credentials of Albrighton as a sustainable location for further housing growth in the context of its social and transport infrastructure, as well as the approach advanced in the Draft Plan to support the growth of RAF Cosford as a strategic site with the proposed allocation of some 220.1 ha of land. Where this will act to further elevate the demand for nearby housing, ensuring supply is increased will be in the interest of supporting the sustainable future growth of Albrighton.
3. **The evidence presented in this report supports the approach taken by the Council to plan positively for accommodating identified long-term housing needs but indicates that the proposed requirement is likely to underestimate the full need for housing.** The report identifies that:
 - **The NPPF / PPG strongly support the position taken by authorities such as Shropshire to identify a housing requirement which is higher than that implied**

as a **'minimum' level through the standard method**. This particularly recognises economic ambitions relating to the M54 growth corridor with a clear commitment across a range of strategies to ensure that this investment is successful, with the outlined aspiration representing a significant potential growth in employment opportunities across the corridor. Furthermore planning for a higher level of provision is necessary to respond to the pressing need to deliver much needed affordable homes to address the consequences of historic under-provision;

- **Whilst the proposed housing requirement is higher than the outcome of the current standard method, up-to-date demographic projections suggest higher levels of need are likely to arise where recent growth is sustained.** This is reflected in the outcome of the new standard method proposed by Government, which it is acknowledged is only out for consultation but reflects the impact of these more recent projections on need in the county; and
- **Planning for higher levels of housing need is also considered prudent in the context of the significant housing need pressures identified in the Greater Birmingham/ Black Country HMA,** with which both Shropshire as a whole and Albrighton are identified as having strong functional housing market relationships. There is little evidence to date that the full scale of need associated with either a minimum level, or indeed those associated with delivering the HMA's economic growth ambitions, will be accommodated in the current generation of Local Plans. The result will be a continued displacement of housing demand pressures, which will in turn place greater pressure on local housing markets in Shropshire, as well as other areas, where connections are strongest. The opportunity exists for the Council to take an even more positive approach in providing for these needs again with reference to the unique position it has in joining housing markets through the M54 Corridor.

4. The report also identifies that **the Council should reconsider the level of planned housing provision in Albrighton and more positively enable its growth over the plan period**. This recognises the higher need pressures across Shropshire and in particular the area in which Albrighton is located, as noted above. It also, however, recognises that:

- Albrighton is exhibiting **the consequences of a long-term limiting of its growth, despite sustained need and demand**. Principally this is illustrated by a long-term decline in its population and a more recently static picture which is materially changing the demographic profile of the town. Where historically it has demonstrated a notably sustainable profile, including a high proportionate share of those of working age, it is rapidly seeing an ageing of its population. Where the ageing of its population is an inevitable consequence of earlier growth, this is compounded by a sustained reduction in younger people including children;
- Where the absence of new supply is an important contributing factor – with Albrighton having seen one of the lowest rates of housing delivery of the key centres in Shropshire – this is compounded by **high demand for homes**. There is evidence of an acute worsening of market conditions, with consequences for the

affordability of housing. This is further limiting the ability of younger households to access housing in the settlement, which is further inhibited by the lower representation of smaller homes in Albrighton;

- Albrighton has demonstrated relatively strong connections between home and work, with this influenced in part by its proximity and accessibility to RAF Cosford as a significant employer. **Insufficient consideration has been given in the Draft Plan to the relationship between the planned level of new homes in Albrighton and the anticipated creation of a substantial number of new jobs, associated with the supported growth of this strategic site.** Where new jobs materialise in the plan period, it is reasonable to suggest that these will place increased demand for housing in Albrighton and that consideration should be given to the advantages of sustainably supporting parallel growth in housing in the settlement to a greater extent; and
- Supporting a greater level of housing in Albrighton within the plan period would also have **potential benefits in further enhancing the vitality of the settlement and its social infrastructure.** This is not given adequate consideration in the Council's evidence base where it is recognised as a sustainable place to accommodate growth.

1. Introduction

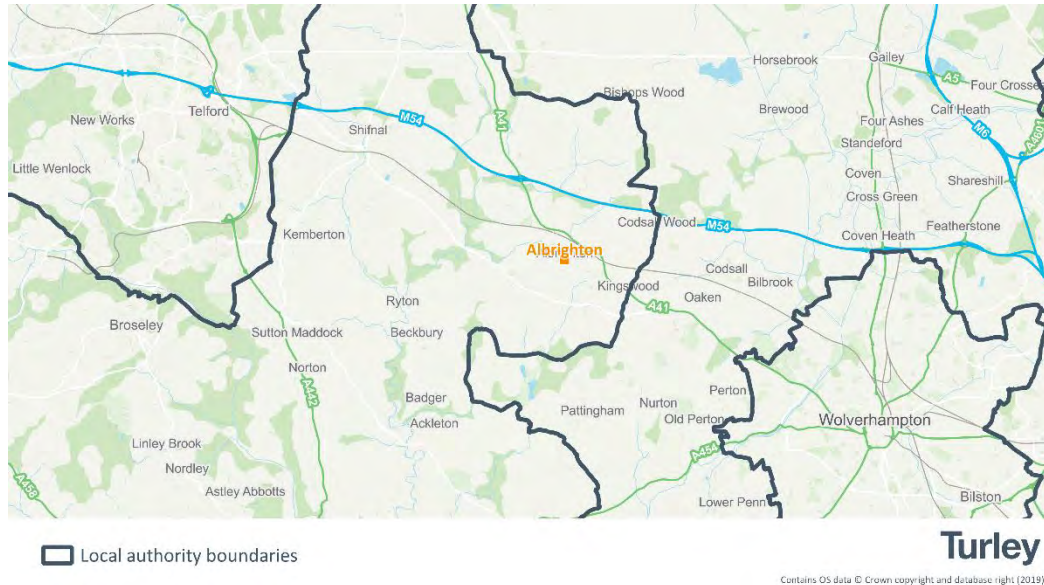
- 1.1 This technical report has been prepared by Turley on behalf of Vistry Homes Limited to inform wider representations to the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan ('the Draft Plan') which the Council is consulting on until 30 September 2020.
- 1.2 The purpose of this report is to provide a technical evidence-based justification as to why the Draft Plan should provide for a greater level of housing growth in Albrighton. This recognises evidence of housing need in Shropshire and within the adjacent areas with which it has strong housing market relationships. It also recognises the locational attributes of Albrighton within the M54 Growth Corridor and the extent to which it can sustainably accommodate growth. The analysis in this report recognises and reinforces:
- The clear direction provided by Government as to the importance of boosting the supply of housing as set out in the ongoing consultations with regards immediate and long-term changes to the national planning system;
 - The sustained ambitions of the Council to respond positively in providing for housing to meet local needs, with the Draft Plan continuing to provide for 1,400 homes per annum (30,800 homes between 2016 and 2038) thus exceeding the current outcome of the standard method (1,177dpa). It does, however, fall below the outcome of the revised method currently being consulted upon by the Government (2,129dpa);
 - The spatial distribution advanced by the Council, which recognises the scale and role of individual settlements – as evidenced through the hierarchy – and the importance of key centres such as Albrighton;
 - The positive implications of the Council's support for the regionally and nationally significant M54 Growth Corridor with regards Shropshire's economy and by implication the need and demand for housing in settlements along this corridor; and
 - The credentials of Albrighton as a sustainable location for further housing growth in the context of its social and transport infrastructure, as well as the approach advanced in the Draft Plan to support the growth of RAF Cosford as a strategic site with the proposed allocation of some 220.1 ha of land. Where this will act to further elevate the demand for nearby housing, ensuring supply is increased will be in the interest of supporting the sustainable future growth of Albrighton.

Introducing Albrighton

- 1.3 Albrighton is situated in the eastern most part of the county of Shropshire, as shown at Figure 1.1. It is located between Telford and Wolverhampton, being nearer the latter. It is directly served by Albrighton railway station and is in close proximity to Cosford train station. Both stations are served by West Midland services which operate hourly, between Birmingham, Wolverhampton, Telford and Shrewsbury. Albrighton also has

strong road connections given its links to the motorway network via the M54. It is in close proximity to RAF Cosford, an important employment location and visitor destination. The settlement has a wide range of local shops, restaurants, facilities and services.

Figure 1.1: Location of Albrighton



Source: Turley

Report structure

1.4 **Section 2** of this report summarises the Draft Plan’s proposals with regards the planned provision for housing and the future growth of Albrighton. This is subsequently framed within the context of:

- The appropriate and justified local housing need in Shropshire with reference to national planning policy and guidance, including the potential implications of the ongoing Government consultation, which is concisely summarised in **section 3**;
- The scale, urgency and nature of housing needs at the strategic level, recognising as shown in Figure 1.1 the proximity of Albrighton to Wolverhampton, the Black Country and Greater Birmingham all of which are acknowledged as facing significant housing market pressures. This is explored in **section 4**;
- Specific drivers of housing need along the M54 corridor, given Albrighton’s proximity. This includes a recognition of the economic growth potential and planned transport infrastructure along the corridor. This is presented in **section 5**; and
- Analysis of the implications of the planned growth of RAF Cosford as a driver of local demand for housing in Albrighton. This is considered in **section 6** in the context of evidence of current market demand for housing in Albrighton, and

importantly the extent to which the Council's evidence confirms the ability and benefits associated with its future sustainable growth.

- 1.5 **Section 7** draws upon the above evidence to demonstrate why Albrighton should provide for a greater level of housing need over the horizons of the Draft Plan.

2. Proposed Housing Growth in Albrighton and Shropshire

The proposed housing requirement for Shropshire

- 2.1 Policy SP2 of the Draft Plan proposes a requirement of around 30,800 homes over the twenty two year plan period (2016-38). This equates to 1,400 homes per annum on average.
- 2.2 In justifying this scale of provision, reference is made to the standard method of assessing the minimum need for housing, which suggests that at least 25,894 homes – or 1,177 per annum – are needed in Shropshire. The Draft Plan highlights its approach of providing flexibility beyond this minimum.
- 2.3 The extent to which this is appropriate and justified by the available evidence is considered further in section 3, but it is noted that the policy explanation confirms that this flexibility is intended to:
- Respond to specific sustainable development opportunities;
 - Increase the delivery of family and affordable homes;
 - Support the delivery of specialist housing for specific groups including older people;
 - Support the diversification of the labour force; and
 - Support wider aspirations, including increased economic growth and productivity.

- 2.4 The Draft Plan also asserts that this scale of provision:

“...incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, where evidence indicates housing delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas. This cross-boundary housing need will be accommodated through the distribution of growth outlined in this policy”¹

The proposed growth of Albrighton

- 2.5 Policy S1.1 suggests that:

“Albrighton will act as a Key Centre and contribute towards strategic growth objectives in the east of the County, delivering around 500 dwellings and around 5 hectares of employment development”

¹ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (2020), paragraph 3.7

2.6 It also states, in justifying these levels of provision, that *‘new housing and employment development will respond to local needs’*.

2.7 Planned provision is stated as being comprised of:

- A single employment site of 5 hectares, close to Albrighton railway station, which is proposed for allocation;
- Saved allocations from the Site Allocations and Management of Development (SAMDev) – namely ALB002 and ALB003 – as well as other sites with planning permission or prior approval, which total circa 248 homes;
- A proposed allocation to the east of the town, extending into an existing SAMDev allocation (ALB002), which is planned to accommodate 180 homes; and
- Circa 24 homes completed during the first three years of the plan period (2016-19); and
- Circa 48 future completions on windfall sites.

2.8 A further 19.86 hectares of land, across three separate sites, is proposed to be safeguarded for future residential development beyond the plan period.

2.9 Importantly, whilst the above would apparently relate to local needs – given the justification of the Draft Plan – the policy text also indicates that *‘new employment development will primarily be delivered at the nearby RAF Cosford Strategic Site’*.

2.10 Indeed, in the policy explanation text, the Draft Plan acknowledges the:

“...relationship between Albrighton and the nearby Strategic site at RAF Cosford, with many employees and personnel based at RAF Cosford choosing to live in Albrighton and/or use the facilities within the settlement and certain facilities at RAF Cosford being available for residents of Albrighton”²

2.11 The extent to which this relationship will affect the future need and demand for housing in Albrighton is considered further in this report, alongside analysis of local drivers of need.

Implications

2.12 The remaining sections of this report reaffirm the evidence to support the approach taken to both:

- Plan positively for the needs of existing and future residents across Shropshire, by planning for a housing requirement which is above that calculated as the minimum starting point using the standard method and incorporates an acknowledged unmet housing need from an adjacent housing market area; and

² Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (2020), paragraph 5.15

- Enable Albrighton to grow sustainably, recognising its strategic significance in the context of planned growth corridors and associated investment associated in particular with RAF Cosford.

2.13 Where the above are supported, the following sections also show that the Draft Plan must acknowledge evidence of higher housing need, locally and in the wider context. They demonstrate that Albrighton can play a greater role in contributing towards meeting these needs within the plan period.

3. Shropshire's Local Housing Need

- 3.1 The current consultation on the Draft Plan is being undertaken in the context of the most recent National Planning Policy Framework (NPPF) published in February 2019.
- 3.2 The NPPF retains at its core the Government's commitment to ensuring that the planning system achieves the parallel objectives of delivering the homes that are needed, supporting the ongoing development of a strong, responsive and competitive economy, making effective use of land and protecting and enhancing the natural environment³.
- 3.3 The NPPF confirms that a '*local housing need assessment conducted using the standard method*' should be used to '*determine the minimum number of homes needed*'⁴. Accompanying Planning Practice Guidance (PPG) reaffirms that the standard method formula is '*to identify the minimum number of homes expected to be planned for*' and '*does not produce a housing requirement*'⁵. There is no policy constraint on planning for a level of housing provision in excess of the minimum figure calculated, with any such uplift to be considered '*prior to and separate from considering how much of this need can be accommodated in a housing requirement figure*'⁶.
- 3.4 The PPG confirms that the Government is '*supportive of ambitious authorities who want to plan for growth*' by surpassing any '*minimum starting point*' derived from the standard method⁷.
- 3.5 On 6 August, the Government launched two separate consultations, one of which ('*Planning for the future*') proposes fundamental reforms of the planning system. The other proposes and seeks views on '*changes to the current planning system*', including changes to the standard method for assessing local housing need. In proposing a revision to the standard method calculation, the Government is clear that it is intended to *inter alia*:
- Achieve a better distribution of homes towards high demand areas and in emerging demand areas across the country; and
 - Be consistent with the Government's ambition for a housing market that supports 300,000 homes by creating a method with a suitable overall national number that enables achievement of that aim. The revised standard method indicates a national need for some 337,000 homes per annum, compared to approximately 265,000 homes under the current method. This is noted as being designed to provide enough land to account for the drop-off rate between permissions and completions.
- 3.6 The Council has presented a timetable for the future stages of Local Plan preparation beyond the current consultation. This confirms an intention to publish a Regulation 19

³ MHCLG (2019) National Planning Policy Framework, paragraph 8

⁴ *Ibid*, paragraph 60

⁵ PPG Reference ID 2a-002-20180913

⁶ *Ibid*.

⁷ PPG Reference ID 2a-010-20180913

(publication) version of the Local Plan in autumn / winter 2020, before its submission in early 2021. This timetable is relatively tight where the Council presumably intends to reflect on responses to its consultation.

- 3.7 The transitional arrangements proposed by Government mean that the current standard method would apply in the case of Shropshire, where this timetable is followed. This recognises that the consultation document confirms that:

“Authorities close to publishing their second stage consultation (Regulation 19), should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan and a further 6 months to submit their plan to the Planning Inspectorate”⁸

- 3.8 Where the publication date of revised guidance is anticipated to be no earlier than winter 2020, this would likely require the Local Plan to be submitted for examination in early 2021.
- 3.9 In this context, in evaluating the proposed housing requirement, consideration is first given to the application of the current NPPF and associated guidance. Separate reference is then made to the proposed revised method where should the timetable slip this could have direct relevance, albeit noting that the date of its application and indeed the final form of the revision are at this point unknown.

Evidencing local housing need in Shropshire

- 3.10 As set out in section 2, the Draft Plan outlines an intention to provide for 1,400 homes per annum (30,800 between 2016 and 2038), a level of provision which exceeds the current outcome of the standard method (1,177dpa). This ostensibly provides circa 4,906 homes above the minimum. This suggests a degree of uplift even where, as noted in section 2, the Draft Plan indicates that the requirement includes 1,500 homes to meet needs from the Black Country housing market area (considered further in the following section of this report).
- 3.11 The approach taken by the Council in proposing a housing requirement which recognises a higher need for housing than the minimum calculated through the standard method is strongly supported in the context of the circumstances set out within the Draft Plan. This approach continues to comply with the NPPF and PPG which are clear in highlighting the importance of assessing whether it may be appropriate to plan for a higher housing need figure, stating in this context that:

*“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. Therefore, **there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method***

⁸ MHCLG, Changes to the current planning system (August 2020), paragraph 43

*indicates. This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated...*⁹ (emphases added)

3.12 The PPG identifies some of the circumstances that could lead to increased housing need, beyond the past trends that are embedded in the standard method¹⁰. This is not intended to be exhaustive or interpreted as a closed list, but includes situations where:

- Deliverable growth strategies are in place;
- Strategic infrastructure improvements are likely to drive an increase in local housing need; or
- An authority has agreed to take on unmet need from a neighbour, as set out in a statement of common ground.

3.13 As the analysis in this section demonstrates, these circumstances clearly apply to Shropshire and support a position where a higher housing need is recognised. In the case of the latter, and the acceptance of an agreement to take on unmet housing needs, this is considered further in section 4 of this report.

Growth strategies and strategic infrastructure improvements

3.14 The Draft Plan and its supporting evidence recognise and reference the Council's clearly stated growth aspirations. The latest Employment Land Review (ELR) asserts:

*"It's time for Shropshire to stop their watching brief, to 'catch up' and drive forward their own ambitious economic growth plans, through delivering a balance of local and strategic employment sites as either future allocations, via policies supportive of appropriate windfall employment development or, in the case of locations within the Green Belt, safeguarding of land for future development"*¹¹

3.15 The Draft Plan responds through Policy SP11 by establishing an intention to deliver around 300 hectares of employment development from 2016 to 2038, with allocated sites stated as being intended to deliver against economic growth objectives. The explanatory text proceeds to confirm that these will be supported through the identification of 'Strategic Settlements' and 'Strategic Sites' in the Local Plan and on sites along the 'Strategic Corridors' identified in Policy DP9.

3.16 Policy DP9 of the Draft Plan ('Strategic Corridors') confirms that *'the Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy'*¹². It proceeds to confirm that the identification of 'strategic corridors', which will form the primary focus for major development, is a key contributor to this aim. Indeed the explanatory text confirms that *'the sequential*

⁹ PPG Reference ID 2a-010-20190220

¹⁰ *Ibid*

¹¹ Avison Young, Shropshire Employment Land Review (2019), Executive Summary paragraph 6

¹² Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (2020)

release of additional employment land for development in the ‘strategic corridors’ may also help to attract major employment development into the County¹³.

3.17 The Draft Plan identifies 5 such ‘strategic corridors’, namely:

- Eastern Belt M54/A5, A41/A464 and A4169/A4581/A454;
- A5 West Corridor;
- Central Shropshire;
- North East Shropshire and the A41 corridor; and
- A49 corridor.

3.18 Policy SP10 of the Draft Plan (‘Shropshire Economic Growth Strategy’) affirms that the delivery of employment, presumably including the ‘*step change*’ envisaged by the Strategic Corridors, will be supported by ‘*investment in: Housing of the right type, quality, tenure and affordability, in the right locations with jobs, services, facilities and leisure to make Shropshire a good place to live, work and play*’¹⁴.

3.19 The Shropshire Economic Growth Strategy¹⁵ outlines plans to increase the county’s annual GVA by 12% before 2021 (from a current base of £6 billion), unlocking £300 million of private sector investment, creating 3,700 new jobs, and building 1,375 homes every year in Shropshire.

3.20 A failure to provide the homes needed to support planned and anticipated investment in the Shropshire economy, and specifically that within the Strategic Corridors, would have significant consequences. It risks constraining growth of the local economy and businesses, resulting in unsustainable growth which will add pressure to and potentially overheat the local housing market.

3.21 Where this report focuses on the potential need and demand pressures specifically facing Albrighton over the plan period, it is notably seen to be an area of opportunity for both the Eastern Belt M54/A5 corridor and the North East Shropshire and the A41 corridor. The scale of potential in the M54 corridor in particular, and noting where it relates to the A41, is considered in more detail in the context of future need and demand in Albrighton in section 5 of this report.

Evidence of changing demographic need pressures

3.22 The precise outcome of the standard method is highly sensitive to its input baseline, drawn from the 2014-based household projections. These projections show ‘*the number of households there would be in England if a set of assumptions based on previous demographic trends in population – births, deaths and migration – and household formation were to be realised in practice*’¹⁶.

¹³ *Ibid*, paragraph 4.90

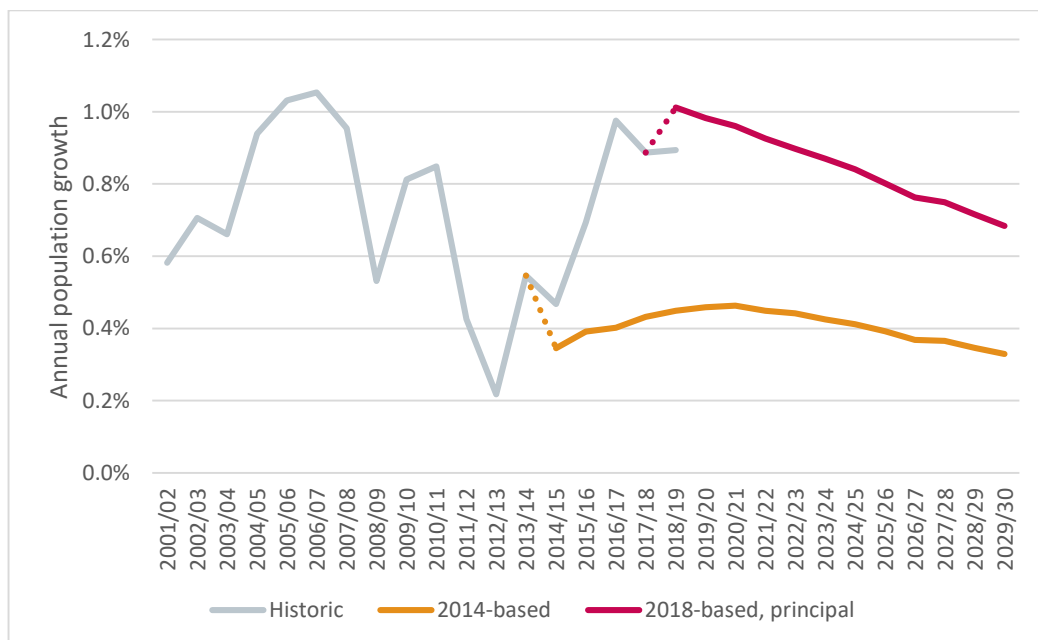
¹⁴ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (2020)

¹⁵ Shropshire Council (2017) Economic Growth Strategy for Shropshire 2017 – 2021

¹⁶ ONS (October 2018) What our household projections really show

- 3.23 As such, the precise figure generated through the method is intrinsically linked to the 2014-based sub-national population projections (SNPP) which estimate how births, deaths and migration might affect the population of local authorities, such as those in the study area. They take account of official population estimates up to and including 2014 – since modestly revised by the ONS – and make assumptions on future changes based on trends recorded in the preceding five year period¹⁷ (2009-14).
- 3.24 Earlier this year the ONS released 2018-based population and household projections, which take account of the latest available mid-year population estimates up to the base year.
- 3.25 For Shropshire, it is notable that the principal 2018-based projections suggest the formation of considerably more households than anticipated by the 2014-based projections, over the period for which the baseline of the standard method is calculated (2020-30).
- 3.26 It is clear – as shown at Figure 3.1 – that this is at least partially because the population has grown beyond the relatively low rate anticipated by the 2014-based projections, returning to the levels of growth experienced circa 10-15 years ago. Where it is recognised that the principal projection should be treated with some caution in that it draws on only a two year migration history, the chart suggests that such a rate of growth is not unreasonable, and in fact it is the lower rates seen for only a short period prior to 2014/15 that can be viewed as being misrepresentative of longer-term trends.

Figure 3.1: Historic and Projected Population Growth Rates in Shropshire



Source: ONS

- 3.27 Where this is considered in the context of the anticipated impacts of planned investment in the economy of Shropshire, sustaining stronger rates of population

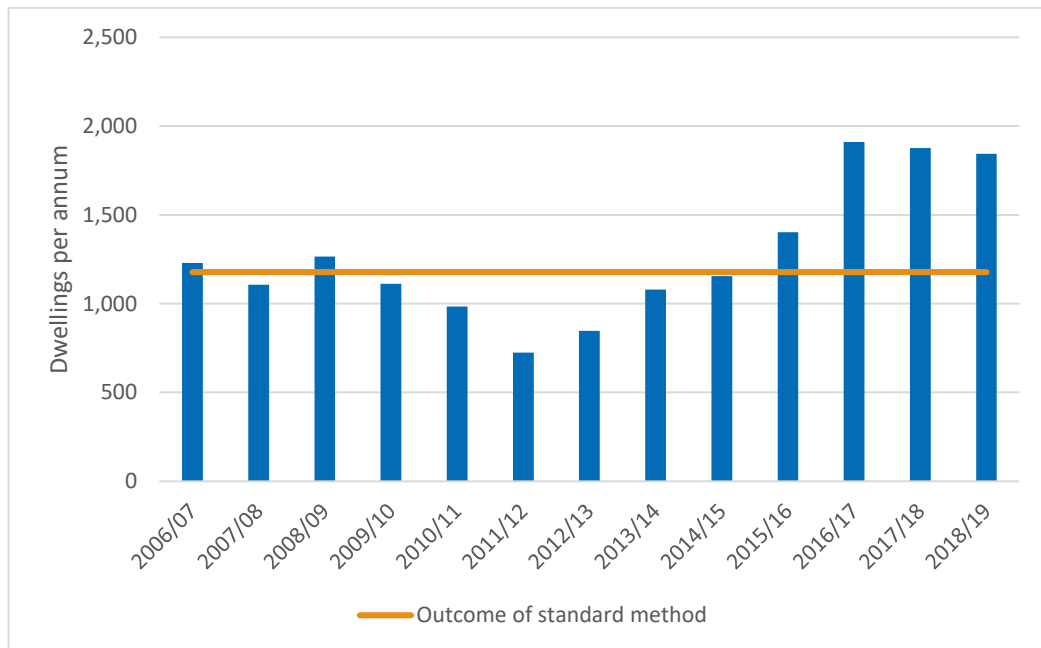
¹⁷ ONS (May 2016) Methodology used to produce the 2014-based subnational population projections for England

growth would appear even more likely as opposed to the position envisaged in the standard method where rates are held at a level which is disproportionately low.

Housing delivery

- 3.28 The PPG requires the outcome of the standard method to be compared against previous levels of housing delivery, and indicates that significantly higher delivery should be taken into account when considering whether it is appropriate to plan for a higher level of need¹⁸.
- 3.29 The Council has published completions data over the period from 2006 to 2019, which indicates that an average of 1,272 dwellings per annum have been completed in this time¹⁹. This exceeds the outcome of the standard method by around 8%.
- 3.30 The following chart shows, however, that the rate of delivery has been rising, aligning with the increasing rate of population growth shown earlier. The past five years (2014-19) have seen an average of 1,637 dwellings per annum completed throughout Shropshire, which is some 39% higher than the outcome of the standard method, and this increases even further – to 59% – when focusing only on the last three years in which an average of 1,876 dwellings per annum have been consistently delivered.

Figure 3.2: Outcome of Standard Method Relative to Past Delivery in Shropshire



Source: Shropshire Council; Turley analysis

- 3.31 Recent levels of housing delivery in Shropshire are a clear indicator of strong demand for new homes. This again must be considered in the context of the area’s investment in its economy and infrastructure, and the pressures relating to unmet needs in proximate areas. Where it is clear that these pressures are likely to be sustained over

¹⁸ PPG Reference ID 2a-010-20190220

¹⁹ Shropshire Council: Five Year Housing Land Supply Statement, March 2020, Table 4

the plan period, as per the evidence above and in section 4, demand can be reasonably expected to remain at a level which exceeds by some way that suggested as the minimum need under the standard method.

Responding to evidenced affordable housing need

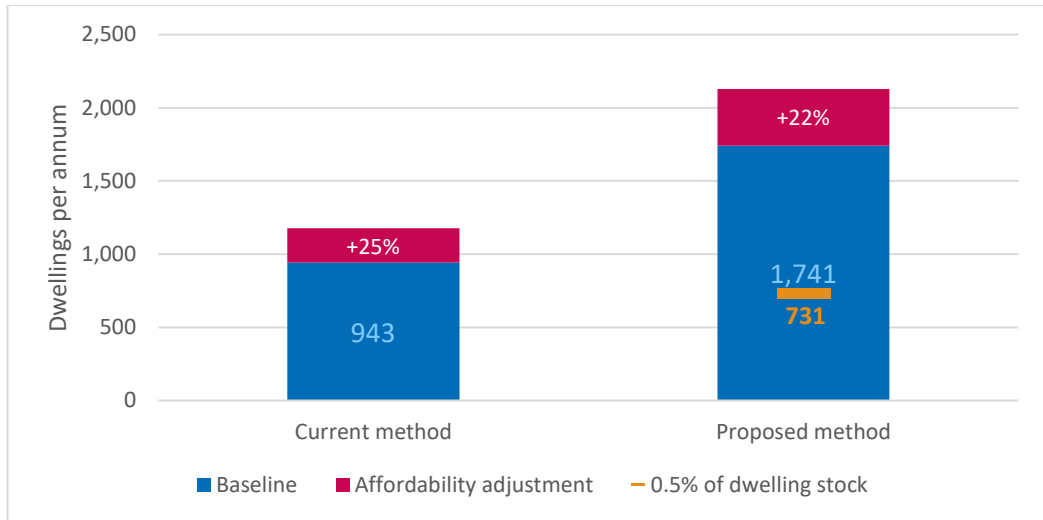
- 3.32 Where the above provide clear evidence of the need and demand for housing in Shropshire being higher than the outcome of the current standard method, and potentially than the requirement advanced in the Draft Plan, the PPG also requires authorities to separately consider the implications of calculated affordable housing need, and its provision, in the setting of a housing requirement.
- 3.33 Policy SP2 confirms the intention to provide for around 7,700 affordable homes or 350 homes per annum. As the Draft Plan acknowledges, the Council's evidence base – in the form of the 2020 Local Housing Need Assessment (LHNA) – indicates that the full need is considerably higher, at around 799 affordable homes per year. This level of need represents some 57% of the overall proposed requirement and will require a significant increase from recent levels of delivery. The last published Annual Monitoring Report confirms that in the last seven years no more than 441 affordable homes have been delivered (2016/17) with the average in this time being only 244 affordable homes per annum²⁰.
- 3.34 Planning for a level of housing provision above the current proposed requirement would further support the delivery of additional affordable housing, and mitigate the risk that the aspired – and necessary – boost in provision is not achieved.

The Government's consultation on *Changes to the current planning system*

- 3.35 As introduced above, these representations are made during an ongoing consultation by the Government on a revised method for calculating housing need.
- 3.36 In looking at the calculation of need following the draft revised method, it is clear that where the proposed level of housing provision compares favourably with the outcome of the current method, it notably falls far below the need for 2,129 dwellings per annum calculated through the revised method that has been proposed by Government. Figure 3.3 shows that this is entirely due to the use of 2018-based household projections as a new baseline, which as noted above are higher and thus take precedence over the new stock-based metric and replace the more dated 2014-based projections that feature as the baseline of the current method.

²⁰ Shropshire Council: Authority's Monitoring Report 2016-17, Table 15

Figure 3.3: Comparing the Current and Proposed Standard Method for Shropshire



Source: Turley analysis

- 3.37 In the context of the above, the Council is advised to give further consideration in the next iteration of its Local Plan to the scale of need, where the current standard method – and the modestly higher provision of 1,400 homes per annum planned – increasingly looks to be underestimating the full scale of need in Shropshire.

Providing for an appropriate supply of land to meet needs

- 3.38 Irrespective of the scale of need, it is similarly important to recognise that the plan must provide for an appropriate supply of housing land to meet needs. Paragraph 59 of the NPPF clearly states that:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”²¹

- 3.39 To ensure that Local Plans deliver the homes needed, their identification of an appropriate supply of land must therefore be based upon:
- An understanding of the geographies of housing market need, to ensure that new homes are provided where needs arise;
 - An appreciation of the segmentation of the market with regards to different needs for different products (size, tenure etc.) generated by different groups in the housing market; and

²¹ MHCLG (2019) National Planning Policy Framework, paragraph 59

- A consideration of the above factors to ensure that the demand for new homes is understood in the context of the proposed supply to ensure that housing land is developed and boosts supply.

3.40 Section 6 of this report considers the importance of adhering to these national policy requirements in the context of planning specifically for the future needs in Albrighton, considering the planned supply of housing land in the context of both the strategic needs identified but also more localised demand relating to the settlement itself and its location within an identified Growth Corridor.

4. Wider Context of Housing Need

- 4.1 The Draft Plan recognises the importance of joint working between strategic policy-making authorities and as referenced in earlier sections asserts that it provides for 1,500 homes to support the needs of the emerging Black Country Plan.
- 4.2 Such a proactive approach is strongly supported and welcomed, particularly where it is clear that there is a significant wider context of housing need in areas proximate to Shropshire and in particular the Black Country.
- 4.3 Where the analysis in the previous section affirms that the local need pressures facing Shropshire are likely to be higher than acknowledged to date, this should not dissuade the Council from continuing to plan positively in this regard with the importance and existence of unmet needs not alleviated. This section initially recognises the work undertaken by Shropshire and the Black Country authorities to establish the scale of unmet housing need. It then considers how such needs could evolve to highlight the importance of maintaining a positive approach in seeking to provide for unmet housing needs through the Shropshire Local Plan.

Unmet housing needs in the wider areas

- 4.4 Published correspondence from last year clearly emphasised the critical role of Shropshire in addressing the unmet housing needs of the Black Country²².
- 4.5 This was framed in the context of an estimated shortfall in the order of 22,000 homes over the period to 2036, but an extension to the plan period to 2038 was then considered likely to elevate this to around 26,000 homes. The subsequent publication of an Urban Capacity Review Update actually elevated the scale of this shortfall to circa 29,300 homes over the period to 2038²³. This was reportedly equivalent to 41% of the homes needed in the Black Country according to the standard method, and it is notable in this context that proposed revisions to the method, as introduced for Shropshire in the previous section, only slightly lower the outcome for this area by less than 2%.
- 4.6 The published correspondence indicates – even in the context of a smaller shortfall – that the Black Country authorities have engaged with surrounding authorities ‘*to understand if they would consider accommodating some of our unmet housing...needs*’, but describes a ‘*mixed*’ response and states that ‘*no local authorities have made a binding commitment in the form of the required statement of common ground to contributing towards addressing the shortfall*’.
- 4.7 Shropshire is one of four authorities – alongside South Staffordshire, Lichfield and Cannock Chase – that are referenced as testing their ability to contribute. It notes, however, that the competing pressure to address the unmet needs of Birmingham means that ‘*a significant shortfall*’ is likely to remain.

²² Correspondence 30.09.2019 – Association of Black Country Authorities with Shropshire Council (listed on the Shropshire Local Plan evidence base)

²³ Black Country Urban Capacity Review, December 2019, paragraph 2.1.40

- 4.8 In this context it is noted that in September 2020 the *'Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement' (July 2020)* was published. This statement makes reference to the recalculated shortfall for the Black Country HMA noted above but also updates the position for the Greater Birmingham HMA. It implies for the period 2011 to 2031 that the shortfall has reduced to 2,597 dwellings.
- 4.9 There nonetheless remains a shortfall, where the supply picture is taken at face value. The full scale of the issue, and its implications for the displacement of demand to other areas such as Shropshire, is evidently more significant where it is recognised that firstly the full need for housing over even this period is likely to be underestimated and secondly the scale of unmet need is only likely to increase beyond 2031. The statement is clear to recognise that the scale of this shortfall for the Birmingham HMA is not yet known but where the Shropshire Plan looks to 2038 this is evidently of significant importance.
- 4.10 In considering the first issue it is important to recognise that where the Black Country has used the standard method as a basis for comparing need and supply the 2018 Greater Birmingham HMA Strategic Growth Study's concluded OAN continues to be referenced. Specifically it is noted that reference is primarily made to the baseline assessment of need as opposed to the higher need identified in the study reflecting the implications of the momentum behind the Midlands Engine Strategy²⁴. This will evidently need revisiting in the context of the ongoing Government consultation on revisions to the standard method.
- 4.11 The latest Supply Position Statement does not provide any reassurance that the full scale of need and the need beyond 2031 is being adequately provided for in emerging generation of Local Plans. Indeed it is noted that the statement concludes by confirming in this context that *'there may also be scope for contributions from local authorities outside the HMA but with a strong functional link to it, such as Shropshire, to help address the shortfall up to and beyond 2031'*²⁵.
- 4.12 This only emphasises the crucial role of Shropshire in this regard, and demonstrates the need to make the largest possible contribution towards positively addressing what is acknowledged as being a significant issue for the larger HMA area.

Understanding housing market relationships to the Greater Birmingham / Black Country HMA

- 4.13 Whilst Shropshire falls outside of the defined Greater Birmingham / Black Country housing market area (HMA) the correspondence between the Black Country authorities and Shropshire Council referenced above clearly articulates the joint recognition of the strong functional economic relationships between the two areas. As outlined at the start of the section, the Council has acknowledged the important functional

²⁴ DCLG (Mar 2017) Midlands Engine Strategy

²⁵ Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020, published September 2020), paragraph 6.3

relationships which impact on the operation of the housing market in Shropshire. Specific reference is made to the fact that:

- Between 2010/11 and 2017/18 the total number of residents exported from the Black Country to Shropshire was 16,100 and 7,320 exported from Shropshire to the Black Country. This equated to a net total of 8,810 people migrating from the Black Country to Shropshire; and
- 2011 Census data indicates that some 2,180 working age residents from the Black Country travelled to work in Shropshire and that 4,615 residents travelled to work in the Black Country.

4.14 Building on the above, it is also the case that where the geography is extended to including the Birmingham HMA as well the scale of the relationships is even more pronounced. Similar analysis of the 2011 Census dataset reveals that:

- 14% of the circa 11,800 people moving to a new address in Shropshire during the year prior to the Census had moved from the Greater Birmingham/Black Country HMA; and
- Of the Shropshire residents who work outside of their home district²⁶, 21% work in the Greater Birmingham/Black Country HMA²⁷.

4.15 This clearly reinforces the strong functional housing market relationships between Shropshire and the Greater Birmingham/Black Country HMA and by implication the relevance and importance of the identified issues of unmet housing needs noted above.

4.16 Where the Black Country authorities have recognised the above to emphasise their support for the proposed allocation of the M54 Junction 3 site – given the strong existing transport links from the site into the Black Country, which are proposed to be enhanced – it is important to note that the same is true of other potential settlements and potential development sites with strong linkages via the corridor.

4.17 Looking specifically at Albrighton, the Council's town profile – produced in 2017 – uses 2011 Census data to explore local commuting relationships. This reveals that a substantial proportion of working residents of Albrighton, some 41.6%, also work in that local area. This is understood to be influenced in no small part by the inclusion of RAF Cosford in the geographic definition with this considered further in section 6 of this report. However, in terms of other destinations the two largest are Telford and Wrekin (460 workers or 14.8%) and Wolverhampton (400 workers or 12.8%). Indeed collectively the four Black Country authorities are the destination for almost 19% of all resident workers in the town.

4.18 Looking at flows in the opposite direction, it is clear that whilst the other parts of Shropshire provide 11.8% of Albrighton's workforce (noting 29.1% come from within

²⁶ Circa 30% of the authority's residents.

²⁷ The percentage of all Shropshire's residents who work within the GB/BC HMA is circa 6%.

the town itself), a greater proportion come from Telford & Wrekin (17.3%) with comparatively strong flows from South Staffordshire and Wolverhampton as well.

- 4.19 This reaffirms the clear relationships with surrounding housing markets including the Black Country authorities. Where unmet need pressures are sustained from these authorities it is reasonable to expect that the consequences will be felt in Albrighton as well as other settlements across Shropshire which also have strong functional relationships.

Implications

- 4.20 The evidence presented within this section has reaffirmed the importance of acknowledging Shropshire's exposure to the housing market pressures facing the proximate Greater Birmingham/ Black Country HMA.
- 4.21 Specifically this recognises that whilst this HMA is facing significant housing need pressures, which are in turn anticipated to increase as it seeks to support its economic ambitions, the full need for housing is not being addressed in the current generation of adopted and emerging Local Plans.
- 4.22 The implication of both the scale of housing market pressures arising from the Greater Birmingham/ Black Country HMA, and the strength of relationships between Shropshire as a whole and Albrighton specifically, is that it is reasonable to assume that there will continue to be displacement of demand over the plan period.
- 4.23 This confirms that the approach proposed in the Draft Plan to provide for a level of unmet housing need to support the emerging Black Country Plan is correct. Importantly, however, in the context of a recognition of potentially higher local housing needs the extent to which this will be achieved by the proposed requirement is less certain. Furthermore it is important to recognise that over the plan period the opportunity exists to capture the full benefits associated with the attraction of new residents through the parallel provision of new housing and employment opportunities in sustainable proximity. These aspects are considered with specific reference to Albrighton's future sustainable growth in the remaining sections of this report.

5. A Connected Place – The M54/A5 Growth Corridor

- 5.1 As previous sections have identified, Shropshire and, in the context of the analysis in this report, Albrighton are evidently recognised as benefiting from significant locational advantages based on the strategic connectivity facilitated by existing transport infrastructure.
- 5.2 The Shropshire Economic Growth Strategy²⁸ identifies the ‘M54/A5 East growth corridor’ as one of the key strategic corridors and growth zones. It is recognised as a:
- “...key road and rail transport corridor which reinforces Shropshire’s close proximity to the West Midlands and the growth potential that will develop from the Land Commission as part of the Combined Authority structure”²⁹*
- 5.3 This section considers the economic growth potential of the M54 corridor including both road and rail links and the policy support for its contribution to wider regional, sub-regional and local planning policy and economic strategy.
- 5.4 As the Draft Plan recognises the investment in this strategic corridor provides an important consideration in understanding the impact of the realisation of this potential in sustaining and increasing housing demand pressures in Albrighton and other settlements along the corridor over the longer-term and the influence this could have on shaping housing need in the locality³⁰.

The Economic Growth Potential of the M54 Corridor

Policy and Strategy Context

- 5.5 The Midlands Connect Strategy³¹ establishes a spatial framework for investment based on four Strategic Economic Hubs and six intensive Growth Corridors, which are judged as critical to the economy of both the Midlands and the UK as a whole. The adopted West Midlands Strategic Transport Plan (STP)³² highlights that focused infrastructure improvements in these areas could boost the UK economy by up to £800 million per annum by 2036³³. One of the identified Growth Corridors covers the M54, stretching westwards between Birmingham and Shrewsbury. This corridor encompasses Albrighton, and the town is also situated just outside the Birmingham, Solihull and the Black Country Strategic Economic Hub. This can be seen in Figure 5.1.

²⁸ Shropshire Council (2017) Economic Growth Strategy for Shropshire 2017 – 2021

²⁹ Ibid.

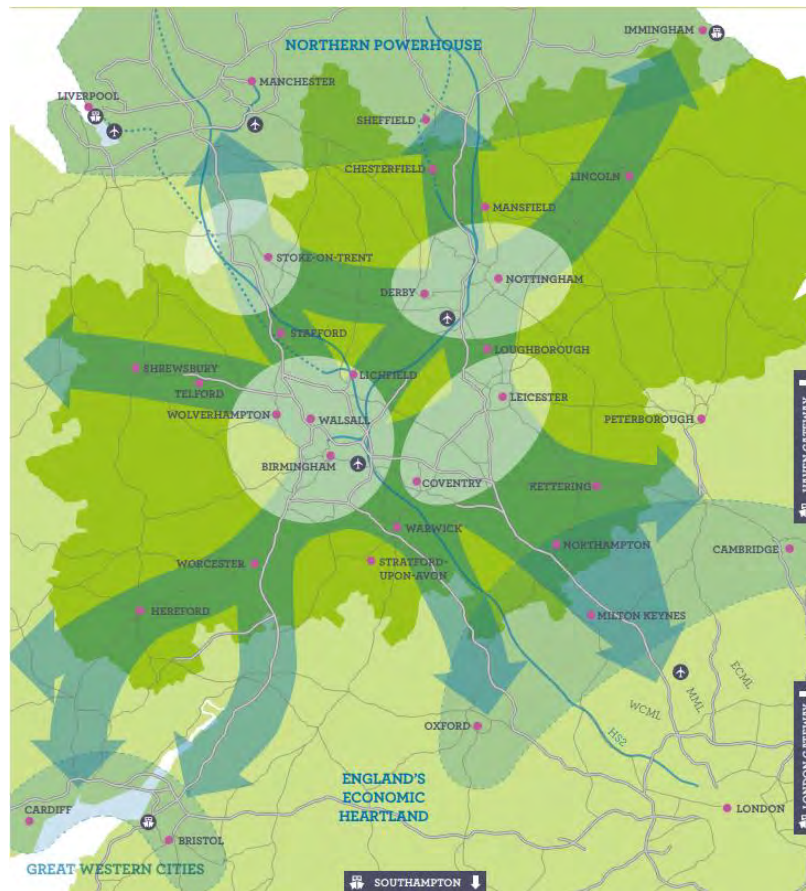
³⁰ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, paragraph 4.91

³¹ Midlands Connect (2017) Midlands Connect Strategy: Powering the Midlands Engine

³² West Midlands Combined Authority (2017) West Midlands Combined Authority Strategic Economic Plan: Making our mark... the West Midlands, the best region in the UK to do business

³³ West Midlands Combined Authority (2015) Movement For Growth: The West Midlands Strategic Transport Plan

Figure 5.1: Midlands Connect Strategy – Intensive Growth Corridors and Strategic Economic Hubs



Source: Midlands Connect

- 5.6 Shropshire Council is a member authority of the Marches Local Enterprise Partnership (MLEP), a partnership between local government and business which aims to accelerate the area’s economic growth. MLEP published a draft Local Industrial Strategy (LIS) in December 2019. This introduces the A5/M54 growth corridor as ‘one of the largest housing and commercial opportunities in the West Midlands.’³⁴ This builds on the MLEP adopted Strategic Economic Plan (SEP)³⁵, which identified roads such as the M54, A5 and A49 and key rail lines as forming key growth corridors, all of which are in close proximity to Albrighton.
- 5.7 Similarly the Economic Growth Strategy for Shropshire³⁶, referenced in the introduction to this section, was adopted by Shropshire Council in 2017, and, identified the M54/A5 East area as a major ‘strategic corridor and growth zone’.
- 5.8 Outside of the M54 Corridor, the Draft Plan also acknowledges the importance of the investment which will be realised as a result of HS2. An additional strategic growth

³⁴ The Marches Local Industrial Strategy, December 2019, Executive Summary

³⁵ The Marches Local Enterprise Partnership (2014) Strategic Economic Plan: Accelerating Growth through Opportunity

³⁶ Shropshire Council (2017) Economic Growth Strategy for Shropshire 2017-2021

corridor linking the M54 to the A41 is also highlighted within the Strategy, linking Shropshire to the HS2 hub at Crewe and to the North West, Cheshire and beyond. Whilst it is recognised that principally the delivery of the Northern Gateway will impact most significantly on the northern market towns in Shropshire it will also, via connections to the national rail network, have wider impacts across the County and in settlements such as Albrighton across the M54 corridor.

Providing for growth associated with the M54 Corridor

5.9 The *M54 Growth Corridor – Strategic Options Study* was published in June 2019. This study confirmed that it built upon the *draft West Midlands Spatial Investment and Delivery Plan* (July 2018) which it notes ‘*identified 27 potential corridors/strategic development opportunities, one of which being the M54 corridor*’. This previous study further stated that:

“...the M54 corridor has potential for significant employment growth focusing on key sectors set out in Shropshire’s Economic Growth Strategy linked to the advanced manufacturing opportunities to create a hub maximising the opportunity of i54...and RAF Cosford”³⁷

5.10 The 2019 study provided a series of recommendations to the Council including, inter alia, that they should:

- Prioritise the strategic employment sites at J3, Cosford and Stanton Road to drive forward the County’s corporate objective of economic growth whilst also delivering balanced employment and residential growth; and
- Prioritise employment sites that help redress the current imbalance between residential and commercial sites.

5.11 It proceeds to state that:

“These potential allocations will provide ‘fit for purpose’ employment land that meets the needs of the modern occupier and responds to market demand. This approach will assist in diversifying the economy by attracting occupiers in higher value sectors that drive economic productivity and retain talent in the County”³⁸

5.12 In specifically understanding the implications for Albrighton, the study identifies RAF Cosford as one of the strategic sites that it considers.

5.13 With regards the current use of the site, it notes that between 2,500 and 3,000 people are located on the site at any one point in time, excluding visitors to the museum where it is noted that there are in excess of 100,000 visitors annually. There are also more than 400 dwellings on the site accommodating over 1,700 people. The study confirms that the MOD is planning a £40 million ten year investment programme for the site to develop a hub for training, skills and development.

³⁷ Avison Young, ‘M54 Growth Corridor – Strategic Options Study’ Final Report (June 2019), paragraph 1.4

³⁸ Avison Young, ‘M54 Growth Corridor – Strategic Options Study’ Final Report (June 2019), Executive Summary

- 5.14 Significantly, it is also noted as having the potential to draw further investment into Shropshire and raise its profile as an innovative and self-sustaining economy. It is equally suggested that the realisation of investment, in the context of the existing concentration of advanced manufacturing/ engineering excellence, *'may lead to the development of a cluster of businesses in this sector'*³⁹.
- 5.15 Where it is agreed that the allocation of new sites, including RAF Cosford, are critical as catalysts to capture future investment and secure a new generation of jobs, it is important to recognise that in recent years, MLEP has already managed to attract significant inward investment interest along the corridor. The 2019 study confirms that the i54 is recognised as one of the most desirable places to invest within the West Midlands with key occupiers including Jaguar Land Rover, Eurofins and Moobs. It observes that the site is already fully occupied with Wolverhampton City Council having obtained planning consent for the western extension in 2019 offering up an additional 60 hectares to bring forward for employment which will create a further 1,600 jobs. Similarly reference is made to the T54 development which provides an extension to the existing Stafford Business Park and an opportunity for further inward investment in proximity to i54. It is noted that the development of both sites has raised the profile of the M54 as an attractive investment opportunity.

Implications

- 5.16 It is apparent that there is a significant degree of strategic support from a national to a local level for realising the economic growth potential of the M54 corridor.
- 5.17 The realisation of investment along the corridor forms an integral part of the Midlands Growth Engine proposals and aligns with national priorities to support the delivery of new jobs and to create sustainable connections. This position is strongly supported by the Council as articulated within its own economic strategy and the emerging Marches LIS.
- 5.18 There is already evidence of the corridor's impact in attracting investment and development. Existing strategies provide assurance that this will be sustained.
- 5.19 Albrighton's location on the growth corridor, and the strong connectivity benefits this creates, form an important context for understanding both current demand pressures but also the extent to which these are likely to continue to increase where the corridor's investment is realised.

³⁹ Avison Young, 'M54 Growth Corridor – Strategic Options Study' Final Report (June 2019), Table 5.1, page 40

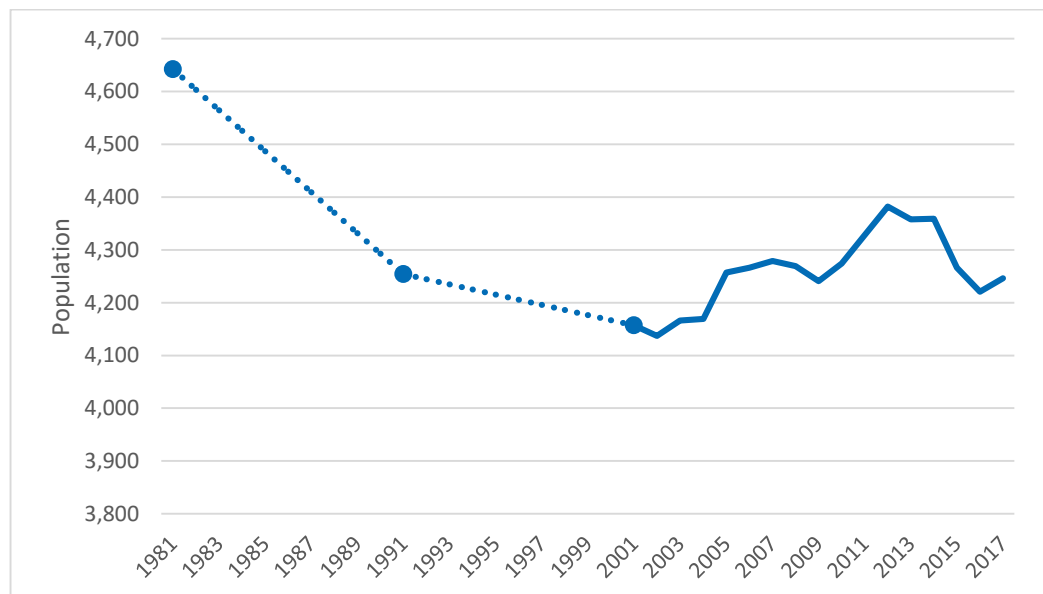
6. Evidencing and accommodating future demand for housing in Albrighton

6.1 This section considers in more detail the operation of the local housing market in Albrighton in the context of an understanding as to its demographic profile and future drivers of local housing need and demand. This includes a consideration as to the important relationship with the proximate concentration of employment at RAF Cosford and the Draft Plan's stated aim to grow this strategic site. The section also considers the extent to which Albrighton can be seen as able to accommodate further growth sustainably.

A changing population profile

6.2 The Council's evidence base reports on the changing size of Albrighton's population back to the 1981 Census, which can be combined with more recent annual estimates of the population at parish level⁴⁰. This is shown at Figure 6.1, which simply shows the linear trend between historic Census years (1981/1991/2001) before moving to annual estimates where available from 2002 onwards.

Figure 6.1: Population of Albrighton (1981-2017)



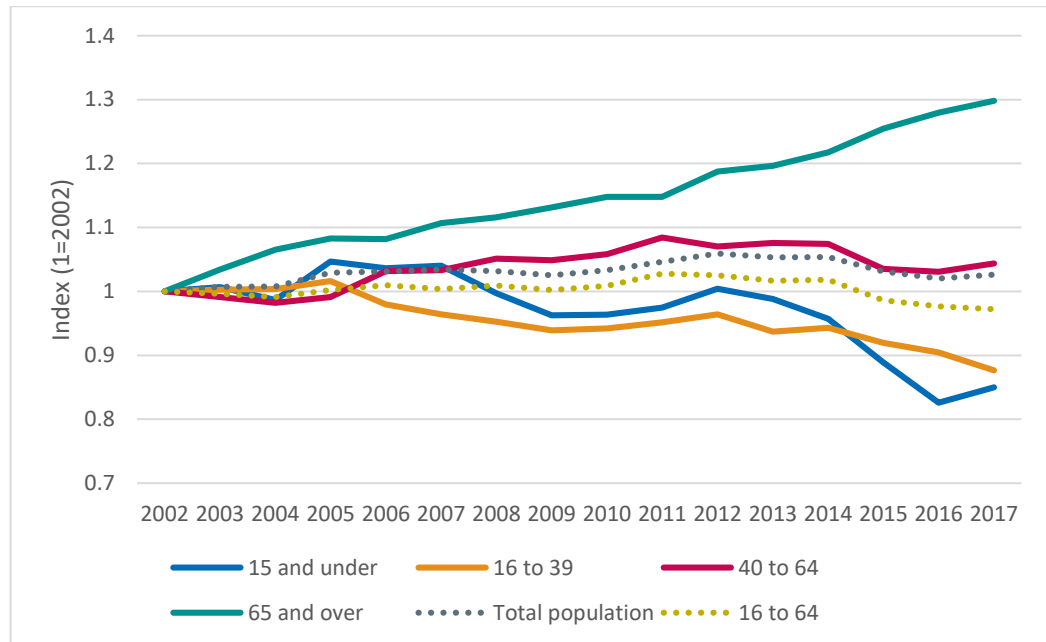
Source: ONS

6.3 It is apparent from Figure 6.1 that Albrighton has a population which is substantially lower than it was thirty to forty years ago. Whilst care should be taken in directly comparing different datasets, the more recent data suggests that the population has stabilised to a degree, with the current population at a level broadly similar to that seen around twenty years ago.

⁴⁰ ONS (2018) Population estimates for parishes in England and Wales, mid-2002 to mid-2017

- 6.4 Where the overall change in population shows an important trend, it is also important to understand how the age profile – and thus the community – is changing within this context.
- 6.5 Figure 6.2 indexes population change by broad age groups over the last fifteen years, thereby covering a period in which whilst the population has fluctuated but remained broadly stable when considered over the full time period (2002-17).

Figure 6.2: Indexed Population Change by Age Group (2002-17)



Source: ONS

- 6.6 The analysis shows a number of important trends with regards the representation of different age groups, namely that:
- There has been marked growth in the number of residents aged 65 and over. This has represented a sustained and consistent trend and is a reflection of the ageing of working age cohorts into retirement;
 - There has been a similarly consistent fall in the number of people aged 16 to 39 and by association, given their tendency to form families, those aged 15 and under; and
 - The number of “working age” residents, aged 16 to 64, has fallen.
- 6.7 The Council’s 2017 town profile observed that of all the towns in Shropshire, Abington had the greatest proportion of residents aged 16 to 64 as of 2015, with some 75.4% of residents in this age bracket. It is evident the sustained nature of the ageing of the population means that this proportion is falling. It is important to note that without the replenishment of those in the younger share of the working age group this trend will be ever more exacerbated as those aged 40+ continue to advance towards retirement over the plan period.

- 6.8 The challenge of this ageing population is recognised within the Albrighton Neighbourhood Plan, with specific reference to the issues related to the underrepresentation of young people. This challenge is considered below with regards to the relationship between the planned provision for new jobs, specifically in terms of RAF Cosford's identification for growth, and the accessibility of current housing for younger people and finally the planned supply response in the Draft Plan.

The impact of planned employment growth

- 6.9 The Council's town profile for the settlement confirms that:

*"Albrighton is the fourteenth largest employment centre in Shropshire and is one of [the] main location[s] of businesses and jobs in the east of the County along with Bridgnorth and Shifnal"*⁴¹

- 6.10 It notes that approximately 1,000 people were employed in the town as of 2015 and that 2011 Census data indicated it had the highest job density of all of the settlements in Shropshire, at 1.43 jobs per resident worker compared with an average of 0.95 across Shropshire. It is suggested that this concentration of jobs reflects the presence of RAF Cosford, albeit it is noted that the identified job figure above falls notably below the current estimates set out in the M54 Growth Corridor and referenced in the preceding section.

- 6.11 As set out in section 2, the Draft Plan proposes the allocation of 5ha of employment land to enable Albrighton to attract business investment and create local employment opportunities. Where this would be expected to reinforce its current employment base, it is acknowledged as a comparatively modest level of growth justified against the comparatively modest level of new housing provision.

- 6.12 Significantly, however, in considering the impact of jobs on housing need in Albrighton as the Albrighton Neighbourhood Plan (2013)⁴² recognises it is critical to consider the importance of RAF Cosford. The Neighbourhood Plan acknowledges in its Vision that *'the future of RAF Cosford is expected to be fundamental in shaping Albrighton's future'*⁴³. It proceeds to explain that:

*"The presence of RAF Cosford exerts a significant influence over many aspects of life in Albrighton. Decisions made by the Ministry of Defence regarding the future of RAF Cosford will therefore have a fundamental impact on the future of Albrighton. Depending on what that decision is, it could have major implications for the land use planning needs of Albrighton and therefore it may be necessary to review the Neighbourhood Plan Light and associated Shropshire Council Development Plan Documents"*⁴⁴

⁴¹ Albrighton Market Town Profile (Winter 2017), Shropshire Council, page 14

⁴² Albrighton, Donington with Boscobel and Boningale Parish Councils, Albrighton Neighbourhood Plan 'Light', 2013

⁴³ *Ibid*, page 8

⁴⁴ *Ibid*, paragraph 2.20

- 6.13 The Draft Plan itself also recognises the importance of this relationship acknowledging that there are *‘many employees and personnel based at RAF Cosford choosing to live in Albrighton’*⁴⁵.
- 6.14 In this context, and as already identified in section 5, the approach taken in the Draft Plan to support the allocation of land to enable the growth of RAF Cosford forms an important context. The ELR summarises the potential of the site in its section considering the supply of employment land in proximity to Albrighton, stating:
- “RAF Cosford is a key asset within Shropshire. It is a nationally significant hub for advanced manufacturing/engineering expertise and training, employment and skills development and a renowned tourism destination (Cosford Air Museum). As such it has the potential to provide further employment opportunities either directly on the site or within the surrounding area, especially given the added value that such adjacencies could provide”*⁴⁶
- 6.15 The Draft Plan confirms that the Defence College of Technical Training (DCTT) is reviewing capacity at RAF Cosford and whilst this work is ongoing *‘estimates from DCTT high-level strategic estate planning indicate that over the next 10+ years RAF Cosford would see in the region of an additional 1,500 people (staff and student population), although this could potentially increase further’*⁴⁷. Furthermore the Draft Plan notes recently announced plans to form a specialist aviation academy (the Whittle Engineering Academy) which it confirms *‘further elevates the importance of this location for UK aviation and potentially creates hundreds of new jobs at the site’*⁴⁸.
- 6.16 Expansion of the site is also justified as being intended to enable the Midlands Air Ambulance Charity (MAAC) – currently operating on the site – to develop a new headquarters in order to combine the existing airbase on RAF Cosford with another, integrating supporting and ancillary services.
- 6.17 The above clearly affirms that in providing for RAF Cosford’s growth and expansion there is an expectation that the scale of jobs available to residents will increase, albeit the full scale of this growth is not quantified but could reasonably exceed the 1,500 referenced above⁴⁹. As the Neighbourhood Plan identifies, the prospects of RAF Cosford have a material impact on Albrighton where the relationships between employment and labour-force are recognised. In this context it is useful to note the observation in the Council’s town profile for Albrighton that *‘in relation to its population size, self-containment is comparatively higher....29.1% of all Albrighton jobs*

⁴⁵ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, paragraph 5.15

⁴⁶ Avison Young, Shropshire Employment Land Review (2019), paragraph 9.12(3)

⁴⁷ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, paragraph 7.7

⁴⁸ *Ibid*, paragraph 7.10

⁴⁹ It is noted in this context that and given the *‘St Athan Development Brief’* document prepared by the Welsh Government and MOD to inform the Vale of Glamorgan Local Plan process (July 2006), identified a site population of just over 10,000 personnel made up of trainers and trainees. Where RAF Cosford is intended to be an *‘internationally renowned facility’* such a scale of employment opportunity is considered to represent a reasonable benchmark.

are filled by Albrighton residents while 41.6% of working people who live in Albrighton also work there, which gives an overall self-containment of 34.2%⁵⁰.

- 6.18 Where the size of the working age population is not sustained in response to this likely growth in employment opportunities, through a parallel increase in the provision of new homes alongside such jobs, there is evidently a risk that the credentials of Albrighton as a relatively sustainable and self-contained place to live and work will be undermined. Similarly, where the creation of proximate jobs on RAF Cosford materialise, this would have the potential to elevate the demand for new homes, which if it was not matched with new supply would be expected to result in house price and rental pressures. This is considered in the context of current local market signals below.

Local market signals

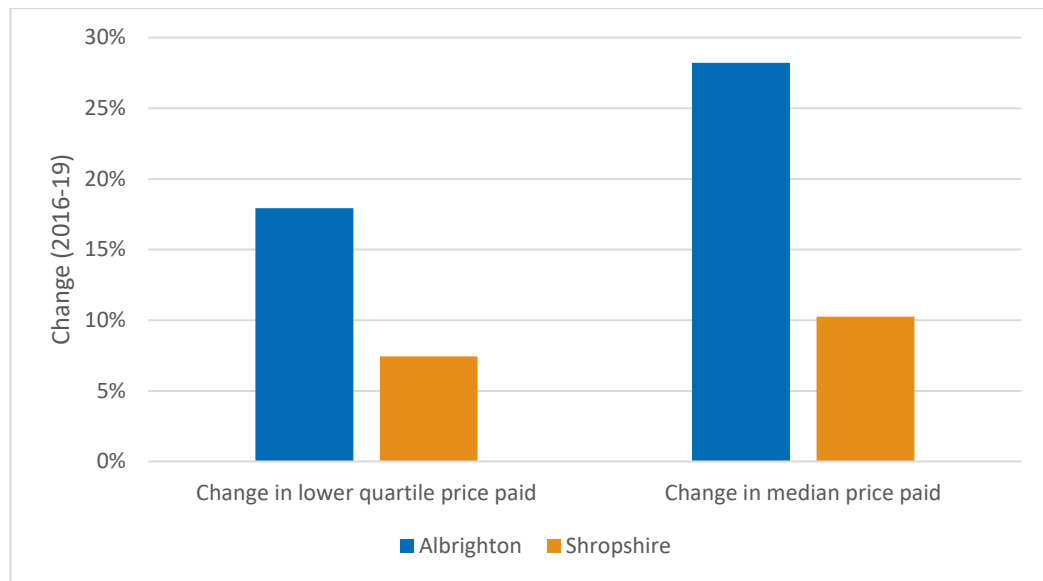
- 6.19 The 2013 Albrighton Neighbourhood Plan observed that *'the community of Albrighton has expressed considerable concern over the ability of young first-time buyers to access the housing market'*⁵¹. The more up-to-date Albrighton Town Profile shows that whilst Albrighton was relatively affordable compared to Shropshire as of 2016, entry level house prices – at the lower quartile – remained equivalent to over 8 years' earnings. Median house prices equated to 5.7 times median earnings. Each exceeds the ratio of 4 years which is recognised by the Government in the current standard method as being symptomatic of areas where *'there are not enough homes'*⁵².
- 6.20 Given that the above reflected the position as of 2016, it is notable – as shown at Figure 6.3 – that entry level and median house prices in Albrighton have rapidly increased in the intervening period, faster than the average for Shropshire. This suggests that affordability is likely to have worsened, further exacerbating the challenges facing young first time buyers and making it even more difficult to stay in or move into Albrighton.

⁵⁰ *Ibid*, page 25

⁵¹ Albrighton, Donington with Boscobel and Boningale Parish Councils, Albrighton Neighbourhood Plan 'Light', 2013, paragraph 4.23

⁵² MHCLG (2017) Planning for the right homes in the right places, paragraph 24a

Figure 6.3: Change in Price Paid for Housing in Albrighton and Shropshire (2016-19)



Source: Land Registry; Turley analysis

- 6.21 Where the Neighbourhood Plan highlighted the importance of elevating the supply of affordable housing to address recognised needs, and by association the challenge in the reducing size of the younger population, it is evident that the supply response to date has not been sufficient to improve the situation for first time buyers.

Historic and planned housing supply

- 6.22 The Albrighton Neighbourhood plan comments that the ‘*main growth of the village over the past century occurred in the 1930s and 1960s*’⁵³. The limited scale of growth subsequently is an important factor contributing to the long-term trend of population decline – shown at Figure 6.1 – and its ageing, shown at Figure 6.2.
- 6.23 The Council’s latest published monitoring⁵⁴ confirms that new supply has had a limited role more recently in Albrighton, showing that only 54 net additional dwellings were completed between 2006 and 2016, equivalent to just over 5 dwellings a year over the ten year period. When compared with all of the other market towns / key centres this is the lowest absolute level of delivery, in no small part because of the constraint of the West Midlands Green Belt and the local policy approach taken with regards the release of land to enable new homes to be delivered.
- 6.24 Appendix 5 of the Draft Plan confirms that this low rate of delivery has also been maintained over the last three years, with only 24 completions between 2016/17 and 2018/19 equating to a slightly higher 8 homes per annum. Again this rate of completions is one of the lowest of the Key Centres, exceeding only Bishops Castle and Church Stretton.

⁵³ Albrighton, Donington with Boscobel and Boningale Parish Councils, Albrighton Neighbourhood Plan ‘Light’, 2013, paragraph 8.4

⁵⁴ Shropshire Council: Authority’s Monitoring Report 2016-17 (March 2018), Table 7

- 6.25 This low rate of supply must also be considered in the context of the evidencing of a more pronounced worsening of market signals observed above (Figure 6.3) when compared to the county as a whole.
- 6.26 The Draft Plan proposes circa 500 new homes in Albrighton over the plan period, which runs from 2016 and thus includes the recent completion of 24 homes. It therefore plans for the future completion of around 25 dwellings per annum, from 2019 onwards.
- 6.27 While this would evidently represent an increase from the recent rates of delivery, it remains a very modest level of provision when set in the context of the above analysis. It is noted in the justification text to the policy that in acknowledging the ageing of Albrighton's population emphasis is placed on new provision delivering smaller housing types and housing for the elderly.
- 6.28 Looking first at the objective of delivering homes to meet the needs of the growing elderly population, where it is clear that there is a local need for such housing arising from the changing circumstances of existing households in Albrighton over the plan period, there is an evident risk that in limiting the scale of provision of other types of housing the opportunity to support a more sustainable demographic profile is lost. This recognises in particular that whilst some households will embrace the opportunity to downsize where new homes become available, many will not or indeed the changing needs of individuals in older households may result in the occupation of two homes rather than the immediate release of family housing stock.
- 6.29 This is important in the context of the Neighbourhood Plan's parallel objective of requiring a high proportion of one and two bedroomed units, to address the challenge noted above with regards the attraction of younger families.
- 6.30 The demand for family housing, recognising Albrighton's history as a town with a significant economically active population due to its proximity and accessibility to economic opportunities, is unlikely to abate. Indeed where new employment opportunities materialise associated with the support for new local employment land and the growth of RAF Cosford this demand is only likely to increase. The provision of appropriate housing catering for this demand is important both in terms of managing the consequences of worsening market signals but also with regards the wider benefits it could have on the sustainable growth of the town.

A sustainable place to accommodate growth

- 6.31 In support of the partial review of the Shropshire Development Plan, in 2017 the Council produced a Hierarchy of Settlements document⁵⁵. This was subsequently updated by the Council in 2020 to inform the Draft Plan⁵⁶. These studies outline the provision of social infrastructure in Shropshire's settlements, namely the range of services and facilities within each settlement that support those living and working

⁵⁵ Shropshire Council (2017) Hierarchy of Settlements

⁵⁶ Shropshire Council (2020) Hierarchy of Settlements

within it and its surrounding hinterland. It is stated that the hierarchy is used to inform decisions on a settlement's potential to accommodate new development.

6.32 The hierarchy provides the following definition of Primary and Secondary Services:

- **Primary Services** – Services and facilities that people need to use on a regular basis that are essential to everyday life. These include: Nursery/Pre-School; Primary School; NHS GP Surgery; Convenience Store; Post Office; Petrol Station; and Community Hall.
- **Secondary Services** – Services and facilities that people would expect to be available in larger settlements and are not needed on a day to day basis. These include: Secondary School; Library; NHS Hospital; NHS Dentist; Chemist/Pharmacy; Supermarket; Bank/Building Society; Public House; Place of Worship; Leisure Centre; Children's Playground; Outdoor Sports Facility; and Amenity Green Space.

6.33 Separate consideration is also given to the availability of High Speed Broadband Provision, Employment Opportunities and Public Transport Links.

6.34 Albrighton scores 94 points in accordance with this methodology out of a maximum possible of 116, ranking the town in 13th place in the Shropshire settlement hierarchy, and as the 7th highest-scoring 'Key Centre', and therefore one with significant provision of social infrastructure and services. The Albrighton Neighbourhood Plan also highlighted the importance of the High Street with regards its role as a retail and service centre and noted it as being '*one of the village's strongest assets*'⁵⁷.

6.35 In the context of the social infrastructure already within the town, the 2020 Sustainability Appraisal (SA) report⁵⁸ – published in July 2020 – affirms that Albrighton is a sustainable settlement. It confirms on the basis of the provision of 500 dwellings and 5 hectares of employment land that:

*"Albrighton is an accessible location and this level of growth is likely to minimise the need for additional car-based transport whilst focussing development where there is good existing access to health, leisure, recreational and cultural activities"*⁵⁹

6.36 With regards the ongoing vitality of key social infrastructure the Albrighton Neighbourhood Plan identified that the schools in the settlement at the time of its preparation had a number of unfilled places (76 were noted as at March 2013). Where the analysis of the changing age profile in Figure 6.2 shows that the number and proportion of children has continued to fall in terms of local demand from pupils this is likely to have at least been maintained as an issue. The Neighbourhood Plan recognises the capacity to accommodate new housing in this context and indeed in the context of a recognition that new homes may attract new people from outside Albrighton:

⁵⁷ Albrighton, Donington with Boscobel and Boningale Parish Councils, Albrighton Neighbourhood Plan 'Light', 2013, paragraph 3.1(8)

⁵⁸ Shropshire Council (2020) Regulation 18 Pre-Submission Draft Local Plan: Sustainability Appraisal and Site Assessment Environmental Report

⁵⁹ *Ibid*, page 101

“This was felt to be particularly important for young families who would help to address the general ageing of the population”⁶⁰

- 6.37 Further aspirations were also set out to see improvements to other aspects of the social infrastructure, including medical and leisure facilities, with recognition of the relationship with the growth and changing needs of the population.
- 6.38 The SA does not illustrate or test the implications of higher or lower levels of development. Specifically it does not appear to recognise the implications of the positive anticipated future for RAF Cosford and the associated potentially substantial growth in proximate employment opportunities in arriving at its views on the implications for the sustainable linkages between work and home in the context of the analysis noted in this section. Where it recognises Albrighton as a sustainable location for growth and that development can have a positive impact on maintaining and supporting local businesses it is clear that providing for a more pronounced level of growth in housing alongside the provision of employment growth at RAF Cosford should be considered carefully. Consideration should also be given, in this context, to the additional benefits that more pronounced growth could have on retaining the vibrancy and need for other social infrastructure, including education provision.

Implications

- 6.39 This section has considered the relationship between the need and demand for homes locally in Albrighton in the context of supply.
- 6.40 It is evident that where the town saw substantial growth in the 1960s a more modest subsequent rate of change in its housing stock has impacted on its demographic characteristics. Over the last 10 to 15 years the town has seen a comparatively low level of new housing provision. This has been accompanied by a largely static population, following a period of sustained decline, which has resulted in a gradual ageing of its population. Analysis of demographic data suggests that, without an uplift in new homes, this ageing profile will continue to become more pronounced where Albrighton has seen its younger population, including children, fall and its older population increase.
- 6.41 The lack of new supply, in the face of continued demand pressures, has also seen a deterioration in market signals with acknowledged issues relating to affordability, and specifically the ability of young first time buyers to access housing, having worsened as a result of a higher than Shropshire average growth in entry-level and average house prices.
- 6.42 The Draft Plan proposes what would be an elevated level of new housing delivery, when averaged over the remainder of the plan period, alongside a modest increase in land for new employment uses. However, the extent to which this will address the longstanding issues relating to the transformation of Albrighton’s demographic or

⁶⁰ Albrighton, Donington with Boscobel and Boningale Parish Councils, Albrighton Neighbourhood Plan ‘Light’, 2013, paragraph 4.20

indeed the mix of housing tenures and types identified in the Neighbourhood Plan is not clear.

- 6.43 It is similarly unclear as to the extent to which the planned provision for new housing recognises or responds to the Draft Plan's support for the growth of RAF Cosford. The Neighbourhood Plan and other Local Plan evidence base documents recognise the important relationship between this large employment centre and the town. Where investment on the site translates into the scale of employment opportunities anticipated it is reasonable to suggest that this will place further demand pressures for housing in Albrighton. The accommodation of new homes in this context has the advantage of maintaining the sustainable relationship between the two areas in terms of modest travel consequences. Furthermore a more pronounced growth in housing would also have the associated benefits of addressing to a greater extent the impacts of an ageing population and in supporting local social infrastructure.
- 6.44 It is strongly considered that greater consideration is needed to be given to the impact of RAF Cosford on the planned level of provision in Albrighton specifically and in the context of the identified challenges facing the settlement's sustainable future.

7. Conclusions

7.1 This technical report has been prepared by Turley on behalf of Vistry Homes Limited to inform wider representations to the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan ('the Draft Plan') which the Council is consulting on until 30 September 2020.

7.2 The purpose of this report is to provide a technical evidence-based justification as to why the Draft Plan should provide for a greater level of housing growth in Albrighton. This recognises evidence of housing need in Shropshire and within the adjacent areas with which it has strong housing market relationships. It also recognises the locational attributes of Albrighton within the M54 Growth Corridor and the extent to which it can sustainably accommodate growth. The analysis in this report recognises and reinforces:

- The clear direction provided by Government as to the importance of boosting the supply of housing as set out in the ongoing consultations with regards immediate and long-term changes to the national planning system;
- The sustained ambitions of the Council to respond positively in providing for housing to meet local needs, with the Draft Plan continuing to provide for 1,400 homes per annum (30,800 homes between 2016 and 2038) thus exceeding the current outcome of the standard method (1,177dpa). It does, however, fall below the outcome of the revised method currently being consulted upon by the Government (2,129dpa);
- The spatial distribution advanced by the Council, which recognises the scale and role of individual settlements – as evidenced through the hierarchy – and the importance of key centres such as Albrighton;
- The positive implications of the Council's support for the regionally and nationally significant M54 Growth Corridor with regards Shropshire's economy and by implication the need and demand for housing in settlements along this corridor; and
- The credentials of Albrighton as a sustainable location for further housing growth in the context of its social and transport infrastructure, as well as the approach advanced in the Draft Plan to support the growth of RAF Cosford as a strategic site with the proposed allocation of some 220.1 ha of land. Where this will act to further elevate the demand for nearby housing, ensuring supply is increased will be in the interest of supporting the sustainable future growth of Albrighton.

7.3 **The evidence presented in this report supports the approach taken by the Council to plan positively for accommodating identified long-term housing needs but indicates that the proposed requirement is likely to underestimate the full need for housing.** The report identifies that:

- **The NPPF / PPG strongly support the position taken by authorities such as Shropshire to identify a housing requirement which is higher than that implied**

as a **'minimum' level through the standard method**. This particularly recognises economic ambitions relating to the M54 growth corridor with a clear commitment across a range of strategies to ensure that this investment is successful, with the outlined aspiration representing a significant potential growth in employment opportunities across the corridor. Furthermore planning for a higher level of provision is necessary to respond to the pressing need to deliver much needed affordable homes to address the consequences of historic under-provision;

- **Whilst the proposed housing requirement is higher than the outcome of the current standard method, up-to-date demographic projections suggest higher levels of need are likely to arise where recent growth is sustained.** This is reflected in the outcome of the new standard method proposed by Government, which it is acknowledged is only out for consultation but reflects the impact of these more recent projections on need in the county; and
- **Planning for higher levels of housing need is also considered prudent in the context of the significant housing need pressures identified in the Greater Birmingham/ Black Country HMA,** with which both Shropshire as a whole and Albrighton are identified as having strong functional housing market relationships. There is little evidence to date that the full scale of need associated with either a minimum level, or indeed those associated with delivering the HMA's economic growth ambitions, will be accommodated in the current generation of Local Plans. The result will be a continued displacement of housing demand pressures, which will in turn place greater pressure on local housing markets in Shropshire, as well as other areas, where connections are strongest. The opportunity exists for the Council to take an even more positive approach in providing for these needs again with reference to the unique position it has in joining housing markets through the M54 Corridor.

7.4 The report also identifies that **the Council should reconsider the level of planned housing provision in Albrighton and more positively enable its growth over the plan period**. This recognises the higher need pressures across Shropshire and in particular the area in which Albrighton is located, as noted above. It also, however, recognises that:

- Albrighton is exhibiting **the consequences of a long-term limiting of its growth, despite sustained need and demand**. Principally this is illustrated by a long-term decline in its population and a more recently static picture which is materially changing the demographic profile of the town. Where historically it has demonstrated a notably sustainable profile, including a high proportionate share of those of working age, it is rapidly seeing an ageing of its population. Where the ageing of its population is an inevitable consequence of earlier growth, this is compounded by a sustained reduction in younger people including children;
- Where the absence of new supply is an important contributing factor – with Albrighton having seen one of the lowest rates of housing delivery of the key centres in Shropshire – this is compounded by **high demand for homes**. There is evidence of an acute worsening of market conditions, with consequences for the

affordability of housing. This is further limiting the ability of younger households to access housing in the settlement, which is further inhibited by the lower representation of smaller homes in Albrighton;

- Albrighton has demonstrated relatively strong connections between home and work, with this influenced in part by its proximity and accessibility to RAF Cosford as a significant employer. **Insufficient consideration has been given in the Draft Plan to the relationship between the planned level of new homes in Albrighton and the anticipated creation of a substantial number of new jobs, associated with the supported growth of this strategic site.** Where new jobs materialise in the plan period, it is reasonable to suggest that these will place increased demand for housing in Albrighton and that consideration should be given to the advantages of sustainably supporting parallel growth in housing in the settlement to a greater extent; and
- Supporting a greater level of housing in Albrighton within the plan period would also have **potential benefits in further enhancing the vitality of the settlement and its social infrastructure.** This is not given adequate consideration in the Council's evidence base where it is recognised as a sustainable place to accommodate growth.

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Appendix 3: 'The Shropshire Test'

SP1. The Shropshire Test		Our Response
1. Development will contribute to meeting local needs and making its settlements more sustainable, providing the right mix of new housing, employment and other types of development which:	a. Supports the health, well-being and safety of communities;	As identified within the 'Technical review of the need for new homes in Albrighton' report enclosed at Appendix 2 , Albrighton is within walking distance of the wide range of local services and facilities provided within the village centre. It is also within walking distance of Albrighton Train Station which provides access to Shrewsbury, Telford, Cosford, Wolverhampton and Birmingham.
	b. Supports cohesive communities;	<p>The site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community, including policy compliant levels of affordable homes and a range of dwelling sizes.</p> <p>This is particularly important given that the Albrighton Neighbourhood Plan Light (ANPL) identified that '<i>the community of Albrighton has expressed considerable concern over the ability of young first-time buyers to access the housing market</i>'. Up to date data shows that since the ANPL was published, the prices of entry level and median house prices in Albrighton have rapidly increased faster than the average for Shropshire, further exacerbating the challenges facing young first time buyers and making it even more difficult to stay in or move into Albrighton. The new development would provide policy compliant levels affordable homes and a range of dwelling sizes.</p>
	c. Addresses and mitigates the impacts of climate change;	The Vision Framework (Appendix 1) identifies that there are limited environmental constraints to the delivery of residential development on the site. Moreover, the site is well located, in close proximity to existing services and facilities to allow for the creation of a truly sustainable community within close

	proximity to existing services and facilities and a significant job growth location at RAF Cosford.
d. Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;	New residential development will provide a strong landscape framework comprising new open space provision for formal and informal play and recreation providing opportunities embedded within green infrastructure. Development of the site would include permeable and legible pedestrian and cycle routes, linking through to the adjacent residential areas of Albrighton.
e. Raises design standards and enhances the area's character and historic environment;	The proposed development would be built in accordance with the Future Homes Standard meeting national housing standards as well as seeking to shape the development so that it reflects the character and style of architecture and responding to designated heritage assets within proximity to the site.
f. Makes efficient use of land; and	The site is capable of delivering circa 218 homes at a density of up to 35 dwellings per hectare (dph), assisting in the delivery of new market and affordable housing that is capable of addressing local need in terms of type and tenure. The land can be brought forward for development in the short – medium term to make an important contribution towards the housing needs of the village and wider county.
g. Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.	As set out in Section 1 of these representations, and detailed throughout the Vision Framework (Appendix 1), the site could deliver sufficient infrastructure, services, facilities and where necessary provides opportunities for their enhancement – specifically ecological and biodiversity enhancements.

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