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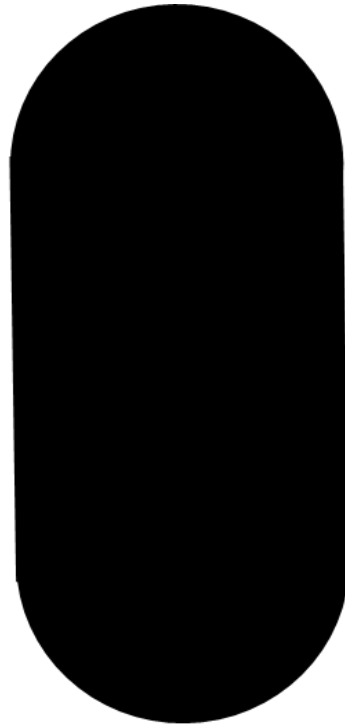
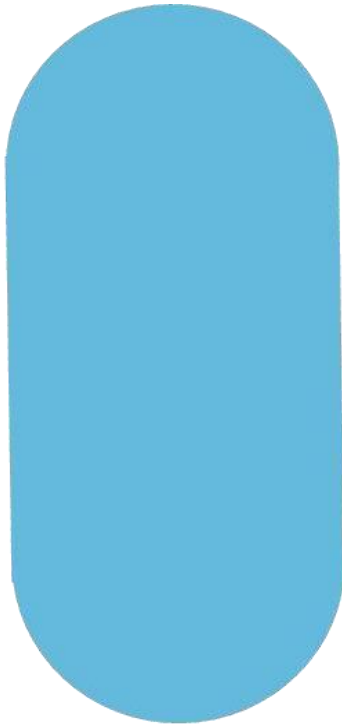
## **Shropshire Local Plan Review**

**Examination in Public**

**Matter 7 – Albrighton Place Plan Area**

**Boningale Homes Ltd**

**September 2024**



## Contents

<b>1. Introduction.....</b>	<b>3</b>
<b>2. Issue 1 – Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy .....</b>	<b>5</b>

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## 1. Introduction

- 1.1. This response to Matter 31 of the Inspectors' MIQs in respect of the Shropshire Local Plan Review (SLPR) Examination in Public has been prepared by Marrons on behalf of Boningale Homes Ltd. Marrons have been instructed to appear at the Examination on behalf of Boningale Homes Ltd.
- 1.2. This hearing statement should be read alongside previous representation to the further consultation (A155 within GC52) submitted by Marrons on behalf of Boningale Homes Ltd and should be considered in the context of support for a plan led system.
- 1.3. Acting on behalf of our clients, Marrons will attend the Matter 31 Hearing Sessions and will make further oral submission on behalf of our client. This statement outlines Boningale Homes' comments in respect of Matter 31, with responses to the Inspectors' MIQs (Matter 31) set out below.
- 1.4. Boningale Homes are a local housebuilder based in Shropshire and are currently building out a high-quality development at 'Millfields' in Albrighton. They are actively promoting land at Albrighton South (Site Ref 36a/36b) and land at Tilstock Road, Tilstock.
- 1.5. The Albrighton South site is subject to a live planning application (24/02108/OUT), which demonstrates that the site is available, achievable and deliverable in the short-term.
- 1.6. In order to assist the Inspectors', the contents of this submission and the submissions made in respect of other Matters, demonstrate that the submission version of the Plan Review is not, in our assessment capable of being found sound, without significant additional evidence and the identification of additional sites to accommodate housing growth over the Plan period.
- 1.7. These submission reflect the recent position outlined by Housing Minister Matthew Pennycook and the Chief Executive of the Planning Inspectorate with regard to the continued use of 'pragmatism' in the Examination of Plans and the recognition that any fundamental issues or areas of additional work that require a pause of more than six-months in the Examination process, should indicate that a Plan is not capable of being found sound. As such aligned with the above consideration, in the current context, we do not believe that the Plan is capable of being found sound.
- 1.8. We consider that the Sustainability Appraisal process is totally flawed, to the extent that it is unlawful, as it does not meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 ("the SEA Regulations"). There has been a failure to consistently and robustly consider reasonable

alternatives contrary to Regulation 12 and Schedule 2, paragraph 8. As such we do not consider that the Plan is capable of being found sound. If however, the Inspectors' are minded to find the Plan sound, as a minimum, the Council should recognise that my clients land at Albrighton should be allocated for development or identified as a reserve site or safeguarded for future development, notwithstanding that Very Special Circumstances have been set out within the Planning Statement of the live planning application that justify release of the land from the Green Belt to accommodate much needed residential, employment and infrastructure provision, without delay,

## 2. Issue 1 – Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy

- 2.1. Draft Policy SP2, 'Strategic Approach' of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 (December 2020), specifically SP2.1, 'Urban Locations' sets out the Settlement Hierarchy of the Shropshire Local Plan Area and identifies Albrighton as a 'Key Centre' which is reflective of the sustainability of the village.
- 2.2. Chapter 5 goes on to discuss the Settlement Policies; the 'Albrighton Place Plan Area' is addressed at S1. S1.1, 'Development Strategy: Albrighton Key Centre' states that Albrighton will act as a Key Centre and contribute towards strategic growth objectives in the east of the County – we agree with this statement.
- 2.3. The Draft Policy states in paragraph 3 that, "new residential development will primarily be delivered through the saved SAMDev residential allocations and a comprehensive development of the Local Plan residential site allocation" – we would express our concerns with this approach. It is not a proactive to rely on older, previously allocated sites; it would be sensible to include a variety of sites with differing availability.
- 2.4. We agree with the statement set out within Paragraph 8 that three areas of long-term growth beyond the Albrighton development boundary have been safeguarded for future development needs beyond the current Local Plan period.
- 2.5. The Draft Policy sets out a single residential allocation for Albrighton, 'Land north of Kingswood Road and Beamish Lane, Albrighton' (ALB017 and ALB021) for the development of 180 new dwellings across approximately 6.53ha, we would comment that 180 dwellings is not sufficient provision.
- 2.6. Three 'Safeguarded Land' allocations have been listed also, these being, 'Land at Cross Road' at 6.98ha, 'Land bounded by Kingswood Road, High House Lane and the By-Pass' at 6.56ha and 'Land between the By-Pass and Railway Line' at 6.32ha. The reasoning for this has been stated as follows, "the nature and scale of development is designed to maintain and enhance Albrighton's role as a Key Centre and ensure that local housing need is achieved, whilst also respecting the settlement's location in the Green Belt". We support the rationale behind safeguarding land for future needs, noting that these sites sit outside of the Green Belt, we would comment that give the proportion of Green Belt coverage in

Shropshire, in order to meet housing need appropriate development within the Green Belt will be required.

- 2.7. Main Modification 076-079 makes minimal changes to the Draft Policy, the changes relate namely to the development of RAF Cosford.
- 2.8. We agree that Albrighton plays an important role as a Key Centre in delivering housing need, we would comment that Albrighton benefits from access to a variety of services and facilities, including numerous bus stops and Albrighton Train Station and is conveniently located to major road networks providing onward travel to main regional employment, retail and leisure centres of Wolverhampton, Birmingham and Dudley.
- 2.9. Albrighton has a strong relationship with Wolverhampton and Birmingham and so in line with the Duty to Cooperate, Albrighton is an excellent location in terms of sustainability and suitability for delivering an appropriate provision of housing toward Shropshire and Wolverhampton and the wider Black Country.



 **Marrons**

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