

LAND AT CROSS ROAD, ALBRIGHTON

**SHROPSHIRE LOCAL PLAN REVIEW:
REGULATION 19 PRE-SUBMISSION DRAFT CONSULTATION**

**REPRESENTATIONS ON BEHALF OF
TAYLOR WIMPEY UK LIMITED**

JBB8335.C7492
Shropshire Local Plan Review:
Regulation 19 Pre-Submission
Draft Consultation

Representations on behalf of
Taylor Wimpey UK Ltd

February 2021

REPORT

Document status

| Version | Purpose of document | Authored by | Reviewed by | Approved by | Date |
|---------|--|---------------|-------------|-------------|---------|
| 4 | Shropshire Local Plan Review: Regulation 19 PS Draft Consultation Representations on Behalf of Taylor Wimpey UK Ltd. | Darren Oakley | Paul Hill | Paul Hill | 19.2.21 |

This report was prepared by **RPS Consulting Services Ltd** ('RPS') within the terms of its engagement and in direct response to a scope of services. This report is strictly limited to the purpose and the facts and matters stated in it and does not apply directly or indirectly and must not be used for any other application, purpose, use or matter. In preparing the report, RPS may have relied upon information provided to it at the time by other parties. RPS accepts no responsibility as to the accuracy or completeness of information provided by those parties at the time of preparing the report. The report does not take into account any changes in information that may have occurred since the publication of the report. If the information relied upon is subsequently determined to be false, inaccurate or incomplete then it is possible that the observations and conclusions expressed in the report may have changed. RPS does not warrant the contents of this report and shall not assume any responsibility or liability for loss whatsoever to any third party caused by, related to or arising out of any use or reliance on the report howsoever. No part of this report, its attachments or appendices may be reproduced by any process without the written consent of RPS. All enquiries should be directed to RPS.

Contents

| | | |
|---|---|----|
| 1 | INTRODUCTION..... | 1 |
| 2 | LAND AT CROSS ROAD, ALBRIGHTON..... | 3 |
| 3 | REPRESENTATIONS ON STRATEGIC POLICIES | 5 |
| 4 | REPRESENTATIONS ON DRAFT SETTLEMENT POLICIES..... | 17 |
| 5 | REPRESENTATIONS ON OTHER POLICIES | 23 |
| 6 | REPRESENTATIONS ON THE SITE SELECTION PROCESS | 29 |
| 7 | GREEN BELT EXCEPTIONAL CIRCUMSTANCES | 35 |
| 8 | GREEN BELT REVIEW..... | 39 |
| 9 | SUMMARY AND CONCLUSIONS | 49 |

Appendices

Appendix 1: Development Vision Document - Land at Cross Road, Albrighton

Appendix 2: CSA Landscape and Green Belt

Appendix 3: Green Belt Technical Assessment prepared by RPS

1 INTRODUCTION

1.1.1 RPS Planning & Development (RPS) is instructed by Taylor Wimpey UK Limited (Taylor Wimpey) to represent their interests in relation to the Shropshire Council's ('the Council') Local Plan Review ('SLPR') and to formally respond to the "Consultation on the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan". RPS has formally responded to each of the Council's informal consultations relating to the Local Plan (Partial) Review, these being; the "Issues and Strategic Options" (March 2017), the "Consultation on Preferred Scale and Distribution of Development Options" (December 2017), the 'Preferred Sites Consultation' (December 2018/January 2019), and the 'Strategic Sites Consultation' (July 2019), and most recently the 'Draft Plan (Second) Regulation 18 Consultation' (September 2020).

1.1.2 Taylor Wimpey (TW) supports Shropshire Council's decision to continue with a review of the Local Plan. The Core Strategy is now eight years old, whose preparation predated both the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) and which sought to deliver the housing requirement from the now revoked West Midlands Regional Spatial Strategy Phase Two Revision Panel Report. As such, it is out of date in various aspects and a review is needed to ensure that the development plan remains up to date. The need for a local plan review, either as a whole or in part, was reiterated by the Planning Inspector appointed to examine the SAMDev in her report (paragraph 23 extract of that report is set out below), who recommended such action as one of her main modifications necessary to make the plan sound:

1.1.3 *"The [review] will include housing requirements (including objectively assessed need), employment land requirements, the distribution of development and a review of Green Belt boundaries, as part of the consideration of strategic options to deliver new development in the review plan period which is likely to be 2016-2036..."*

1.1.4 The previous representations prepared by RPS were made in the context of TW's interests at Land at Cross Road, Albrighton (referred to, where relevant, as 'the Site'), referenced under 'ALB014'). RPS originally submitted this land as a sustainable and deliverable site for residential development through the Strategic Land Availability Assessment (SLAA) "Call for Sites" process, which ran concurrently with the Issues and Strategic Options consultation in 2017. A "Development Vision" document was provided in support of the Call for Sites submission process and also submitted in support of TW's representations to the Preferred Sites consultation.

1.1.5 In addition, previous representations were supported by three discrete supporting documents. Firstly, a Vision Document was prepared addressing the strategic and site-specific issues relating to promoting the Site through the plan-making and planning application process (**Appendix 1**). In addition, those representations were supported by a Landscape and Green Belt Assessment undertaken by CSA (**Appendix 2**). And thirdly, a Green Belt Review technical document, prepared by RPS providing a critique of the SC's own Green Belt Assessment (**Appendix 3**). All these documents are resubmitted in order to ensure that the Council has the full set of documents at each in the consultation process.

Therefore, where necessary and helpful to the process, RPS refers to these documents at appropriate points in the latest representations submitted here. RPS requests that these documents remain part of the full submission of representations to the SLPR submitted on behalf of TW.

Following the Council's consideration of these representations, TW welcomes the ongoing dialogue with Officers to discuss the emerging proposals for the Site As part of its engagement process, TW has met previously with the Parish Council to discuss its proposals and opportunities which the site can bring. It intends to maintain and continue this dialogue with the Parish Council.

1.1.6 In the absence of any specific questionnaire, this submission is structured to provide a specific response to relevant policies of the draft local plan in broadly the order they appear in the document, with additional comments in support of those specific responses.

1.1.7 This submission should be read in conjunction with the previous representations made by RPS on behalf of TW to the Shropshire Local Plan (Partial) Review that commenced in 2017.

1.1.8

2 LAND AT CROSS ROAD, ALBRIGHTON

This chapter of the representations are made in response to SLP Policy S1 (Albrighton Place Plan Area) and Schedule S1.1 (ii) Safeguarded Land: Albrighton Key Centre..

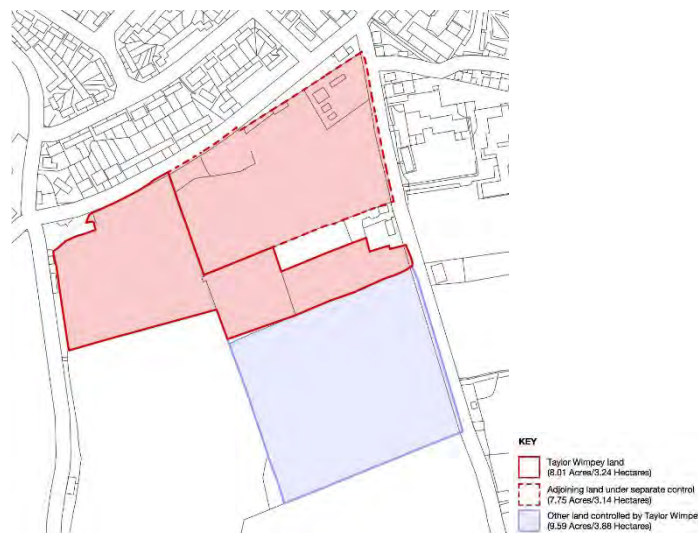
Land at Cross Road, Albrighton – A Sustainable and Deliverable Development

2.1.1 The Site is controlled by Taylor Wimpey (TW) and comprises c.7 ha of land at the south-western gateway to Albrighton, directly opposite but in close proximity to Albrighton Primary School. The Site is highly sustainable being accessible to a range of services and community facilities within the village and enjoying excellent accessibility to the strategic road (A41/M54) and rail network (Albrighton Railway Station links the village with Wolverhampton, Telford and Shrewsbury). The Site is contained by Cross Road to the north, Newhouse Lane to the east and Patshull Road to the west.

2.1.2

2.1.3 A Land Control plan showing the various land ownerships at the site and the adjacent land has been prepared (see figure 2.1 below) The vision for the Site will evolve following further consultation with Shropshire Council and the local community, but initial masterplanning work indicates that the whole site can accommodate c.160 dwellings – c.80 on the land controlled by TW – set amongst 1.7ha of open space including retained trees and hedgerows. Previously, TW were of aware of a community aspiration to deliver enhanced healthcare provision in the village, potentially through the provision of a replacement GP surgery in Albrighton. . . However, information set out in the updated Place Plan for Albrighton (2019/20) indicates that at this time the preference is now to seek enhancements through additional services being provided through a new / extended facility at Shifnal, rather than a new GPS facility at Albrighton¹.

Figure 2.1: Land Control Plan (extract from Development Vision, Feb 2019 – Fig. 4)



¹ Albrighton and Surrounding Area Place Plan 2019/20, Table 1: Priority A and Priority B Projects (pages 9-10)

The Vision for the development is,

“An attractive residential development offering a choice of quality new homes to meet local needs and being fully integrated with, and complementary to, the village of Albrighton”.

- 2.1.4 As stated in previous submissions, an initial meeting with Albrighton Parish Council was held on 23 August 2017 to explain the Vision and Objectives for the site and to invite feedback on the proposals, and a follow-up meeting was held in July 2018. Parish Councillors welcomed the early engagement and recognised the benefits the site could potentially provide. .
- 2.1.5 The development will therefore deliver significant social, economic and environmental benefits and will be truly *“deliverable”* in relation to NPPF para. 73, being *“suitable”*, *“available”* and *“achievable”* (as set out in Sections 5 and 7 of the Development Vision document).
- 2.1.6 In this context, it is our view that the SLP should go much further any simply identify the Site as ‘safeguarded’ for future development beyond the emerging plan period (2016-2038) and incorporate the Site as an allocation for housing. This forms the subject of the remainder of this submission.
- 2.1.7

3 REPRESENTATIONS ON STRATEGIC POLICIES

This chapter of the representations are made in response to SLP Policy SP2 (Strategic Approach), and are broken down into two parts, namely:

- Matters relating to the overall growth strategy proposed under Policy SP2; and
- Matters relating to the distribution strategy as it relates to Key Centres (including Albrighton) identified in Schedule SP2.1 of Policy SP2,

Duty to Cooperate and Policy SP2 – Strategic Approach – Overall Growth Strategy

This policy seeks to establish a housing requirement for Shropshire of ‘around’ 30,800 new dwellings over the period up to 2038. This equates to 1,400 dwellings per annum (dpa). In addition, the policy also plans for the delivery of around 7,700 new affordable homes equating to 25% of the proposed housing requirement. RPS notes the figure of 30,800 represents an increase on the previous figure of 28,750 preferred by the Council, a decision in principle that TW supports.

The Council’s latest evidence on local housing need for the District underpinning the requirement is based on the calculation of need using the current standard method. This is set out in the Council’s Local Housing Need Assessment published August 2020 (Figure 5, p11 refers), which identifies a local housing need of 25,894 dwellings (1,177 dpa) over the plan period as at April 2020.

RPS does not object to the arithmetic of the Council’s calculation under the current methodology as set out in Planning Practice Guidance (PPG). However, RPS does wish to raise objections to the proposed housing requirement figure of 30,800 in Policy SP2 underpinned by this calculation, for the following reasons.

From local housing need to housing requirement

In terms of housing need, the Council’s assessment applies the 2014-based household projections as the demographic starting point, which is consistent with the PPG. This results in a starting figure of 1,177 dpa when applying the relevant steps as defined in the guidance².

Nonetheless, it must be acknowledged that whilst the standard method figure for Shropshire is based on the latest PPG, which states that the standard method identifies a ‘*minimum annual housing need*’ figure, it does not produce a housing requirement. It is therefore necessary to consider those factors that might justify an appropriate (upward) adjustment as a basis for determining how many homes need to be planned for in Shropshire, in line with the guidance on this matter³. In this context, RPS contend that the level of growth to be planned for in Shropshire should be higher than the current annual projected growth of 1,400 dwellings per annum under Policy SP2, for the following reasons.

² Paragraph: 004 Reference ID: 2a-004-20201216 Revision date: 16 12 2020

³ Paragraph: 010 Reference ID: 2a-010-20201216 Revision date: 16 12 2020

Recent growth trends in Shropshire

Firstly, it should be noted that the underlying assumptions that informed the Government’s preferred household projections (2014-based) covered the five-year period leading up to the base year of the projection (2009-2014). However, more recent development trends observed in Shropshire since 2014 suggest that changes in dwellings stock and housing completions are markedly different to the trends observed prior to 2014. .

3.1.7 In terms of dwelling stock changes, Government figures on dwelling stock estimates at the local level indicate significant increases in Shropshire since 2014, and which are a marked difference to changes prior to that date. Table 3.1 below illustrates this clearly.

3.1.8 **Table 3.1 Change in dwelling stock – Shropshire since 2010**

| | 2010-2014 | 2014-2019 |
|------------------------------|-----------|-----------|
| Total Change in stock | 3,624 | 8,159 |
| Annual change (Ave.) | 906 | 1,632 |

Source: MHCLG, Table 125: Dwelling stock estimates by local authority district, Shropshire

3.1.9 In relation to dwelling completions, figures based on the Council’s own annual monitoring indicates significant increase in dwelling completions across Shropshire have been achieved since 2016. In particular, figures set out in the Council’s latest statement on five-year land supply⁴ show that delivery in 2016/17 was 1,910 dwellings; 2017/18 was 1,876 dwellings; and 2018/19 was 1,843 dwellings (an average of 1,876 dwellings completed each year). This is compared to an average of just 1,090 dwelling completions in Shropshire between 2006 and 2016.

3.1.10 Therefore, the analysis set out here indicates that the 2014-based projections applied in the current standard methodology were informed by trends that are markedly different to those observed since the beginning of the plan period (2014 and 2016). As a result, the increase in dwellings since 2016 would most likely have impacted on higher in-migration or (comparatively) lower out-migration, given more housing had been built since 2016 when compared to earlier periods. However, these factors were not captured in the 2014-based household projections.

Addressing Affordable Housing Need in Shropshire

3.1.12 In determining an appropriate housing requirement for the Shropshire, proper regard should be had to the contribution that the requirement could make to tackling the pressing need for affordable housing across the area⁵. This is an issue that was retained in the PPG following its revision in 2018, but which has not been given sufficient consideration by the Council up to this point in determining an appropriate housing requirement.

Previous evidence set out in the Council’s FOAHN 2016 report⁶ (Table 52 provides a summary of the need) identified a need for 1,240 additional affordable homes each year up to 2036 (or

⁴ *Shropshire Council Five Year Housing Land Supply Statement*, Data to: 31st March 2019, Published: 16th March 2020 (Table 4)

⁵ PPG Paragraph: 027 Reference ID: 2a-027-20180913 Revision date: 13 09 2018

⁶ *Shropshire Council Full Objectively Assessed Housing Need (FOAHN 2016)*, Table 51

24,796 in total), which then represented 97.6% of the Council's minimum annual local housing need (based on a local housing need of 25,400 dwellings consulted on at previous stages of the plan review), and 86% of the Council's preferred housing requirement under the Preferred Sites Consultation (c. 28,750). Despite this, the Council was of the view that their preferred housing requirement at the time (Option 3: Housing Growth) would allow the opportunity to deliver affordable housing particularly as a percentage of new open market housing schemes⁷.

3.1.13 Under the current consultation, the dSLP (paragraph 3.15 and 4.46 both refer) now makes reference to an affordable housing need of 799 dwellings per annum, a significant reduction on the previous estimate of 1,240 dpa. This is a specific figure however and we could not locate any relevant up to date evidence (we presume this would form part of a SHMA 2020 'part 2' report) which informed the updated estimate of affordable need. Nevertheless, RPS maintains its view that the Council's approach to addressing the need for affordable housing is insufficient to make any meaningful contribution towards addressing the scale of the problem facing local people in accessing suitable housing that they can afford, for the following reasons.

3.1.14 Firstly, Policy SP2 (point 3) proposes the inclusion of a specific target for the delivery of affordable housing of 7,700 dwellings over the plan period, equating to 25% of the overall housing requirement, or 350 affordable homes per year up to 2038. However, it not clear from the dSLP or supporting evidence how this figure has been derived or how it will be achieved. Furthermore, the delivery of 7,700 or 350 affordable dwellings each year remains less than 50% of the (assumed) annual affordable housing need of 799 dwellings (or 17,578 affordable dwellings in total).

3.1.15 Secondly, RPS notes the delivery of 441 affordable homes during 2016/17, which was the highest since 2010⁸, but still significantly below the 799 homes needed each year, however it is also worth noting that average delivery of affordable homes in Shropshire was 244 dwellings between 2010 and 2017 (there is no available data for the period 2017/18 to 2019/20), or just 30% of the total affordable need based on the Council's updated figure. This represents persistent under-delivery of affordable housing in Shropshire over the last ten years or so.

3.1.16 In this context, RPS does not consider that enough is being done to tackle current and future need for affordable homes in determining the proposed housing requirement. RPS suggests that measures should be taken to address this problem by increasing the supply of land in those locations deemed to be sustainable and on sites that are considered to be deliverable, in particular on Land at Cross Road, Albrighton.

3.1.17 **Duty to Cooperate and meeting the needs of the wider West Midlands sub-region**

Strategic Policy Approach

The NPPF 2019, at paragraph 21, states that:

“Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues)...”

⁷ Shropshire Local Plan Review Consultation on Issues and Strategic Options (January 2017), p16

⁸ Shropshire Council: Authority's Monitoring Report 2016-17, Table 15

Policy SP2 is clearly a 'strategic policy' for the purpose of plan-making, and that any cross-boundary issues identified as they relate to Shropshire should therefore be addressed in the substance of the policy. In this context, RPS is broadly supportive of the Council's 'in-principle' intention to make a contribution to the unmet needs emanating from the Black Country

However, RPS notes the only reference to addressing the identified housing shortfall in the Black Country is made in the supporting text to Policy SP2 of the SLP (paragraph 3.7 refers) as follows,

3.1.18

“3.7...further to discussions with the Black County Authorities as part of their ongoing plan making process, Shropshire’s housing requirement of 30,800 dwellings 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 and delivered through policies S1-S21 of this Local Plan...”

3.1.19

Therefore, as highlighted above, the only specific reference made to addressing this shortfall in the SLP is within the supporting text to Policy SP2, but not in the policy itself. Therefore, RPS contend that the SLP is inconsistent with national policy (paragraph 21) as no specific reference is made in Policy SP2 itself to the policy principle or the specific quantum to be provided for in Shropshire. As a result, there remains a lack of clarity in the strategic policy approach as to whether the Council is intending to make a contribution or not towards the identified housing shortfall in the Black Country.

3.1.20

On this basis, RPS contends that the SLP is inconsistent with national policy and not effective in how the SLP intends to address what the Council accepts as being a 'strategic cross-boundary issue' between Shropshire and areas that has a 'functional relationship'⁹ to it, notably the Black Country. Consequently, the SLP is not soundly-based with respect to this strategic cross-boundary issue.

3.1.21

Scale of contribution proposed towards the identified housing shortfall in the Black Country

As highlighted above, the SLP makes a 'soft' commitment to taking 1,500 dwellings as its contribution to the identified housing shortfall in the Black Country¹⁰. However, the SLP does not explain how this figure has been derived, nor is any reference made in the SLP to where the necessary explanation might exist. Therefore, it is not clear in the SLP why the Council considers a contribution of 1,500 dwellings to be soundly-based or why other potential contributions are not soundly-based either. In the context of this lack of justification for the figure and the less than firm commitment to addressing the identified housing shortfall in the policy, as discussed above, RPS contends that the figure of 1,500 dwellings remains open to challenge.

3.1.22

3.1.23

Therefore, RPS questions the basis for the specific quantum of the contribution (1,500 dwellings) that is set out in the SLP. RPS contends that the contribution made by Shropshire to addressing the identified housing shortfall in the Black Country should be increased, primarily to reflect more recent evidence that has not been taken into account in the preparation of the Pre-Submission

⁹ Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, paragraph 2.27

¹⁰ Comprising Dudley, Sandwell, Walsall, and Wolverhampton authority areas

draft SLP, as discussed below. As part of this process, land proposed to be safeguarded from the Green Belt at Albrighton should instead be proposed as positive allocations.

Current evidence on the capacity of the Black Country to be able to accommodate additional growth estimates a shortfall of between 26,918 and 29,288 dwellings up to 2038¹¹. The range of the shortfall identified was influenced by differing assumptions on 'potential' housing supply, for example by assuming higher densities could be achieved on existing sites, but were nonetheless linked to a local housing need totalling 71,459 dwellings¹² across the four Black Country authorities.

3.1.24

However, more recent evidence published by MHLCG¹³ indicates that the level of housing need for the Black Country authorities is now 76,361 dwellings, an increase of 4,902 dwellings over the period. Table 3.2 sets out the figures in summary.

3.1.25

Table 3.2 Updated housing need figures for the Black Country, December 2020

| Black Country Local Housing Need 2019-2038 (revised) | | | |
|---|----------------------------|----------------------------|-----------------------------|
| (no.of units) | Local Housing Need at 2019 | Local Housing Need at 2020 | Increase in Need (in units) |
| Black Country | 71,459 | 76,361 | 4,902 |

3.1.26

As a result, the increase in the identified local housing need of nearly 5,000 dwellings has a knock-on impact on the scale of the housing shortfall, given that assumptions on expected and potential housing supply are unlikely to have changed since 2019. Table 3.3 summarises the changes. (Please Note: the housing supply assumptions are taken from the Black Country Urban Capacity Study (December 2019) referred to above.

Table 3.3. Updated housing shortfall figures for the Black Country, December 2020

| Black Country Identified Housing Shortfall 2019-2038 (revised) | | | | | | |
|---|----------------------------|--------------------------------|-----------------------------------|------------------------|---------------------------|--|
| (no.of units) | Local Housing Need at 2020 | Existing housing supply (2019) | 'Potential' housing supply (2019) | New existing Shortfall | New 'Potential' shortfall | |
| Black Country | 76,361 | 42,171 | 44,541 | 34,190 | 31,820 | |

3.1.27

As can be seen above, the identified housing shortfall in the Black Country has increased significantly. Table 3.4 below summarises the changes in the identified housing shortfall figures.

Table 3.4 Comparison of identified housing shortfall figures for the Black Country

| Identified housing shortfall in the Black Country | | |
|--|------------------------|---------------------------|
| (no.of units) | New existing Shortfall | New 'Potential' shortfall |
| BC UCS 2019 | 29,288 | 26,918 |
| MHCLG/RPS 2020 | 34,190 | 31,280 |

¹¹ *Black Country Urban Capacity Review* December 2019, paragraph 3.1.33/Table 7

¹² *Black Country Urban Capacity Review* December 2019, paragraph 2.1.4/Table 2

¹³ Ministry for Housing, Communities and Local Government, Indicative Local Housing Need (December 2020 Revised Methodology), published 16th December 2020 as part of its response to the consultation 'Changes to the Planning System' in Autumn 2020

Based on the foregoing analysis, the increase in the identified housing shortfall for the Black Country represents a material change in circumstances that was not known at the time the Pre-Submission draft SLP was being prepared, and which further raises concerns with the justification and soundness of the approach taken in the SLP. In light of this, RPS contends that the scale of contribution to be made in the SLP towards addressing the Black Country identified housing shortfall should be revisited in light of this new evidence. The pertinent issue to address, therefore, is what an appropriate contribution should be, which RPS considers below.

3.1.28

Identifying an appropriate contribution towards the Black Country identified housing shortfall

At the time the Pre-Submission draft SLP was prepared the contribution of 1,500 dwellings equated to around 5% of the Black Country identified housing shortfall¹⁴. However, there is no explanation in the SLP as to how this contribution has been derived. At present, therefore, the figure of 1,500 is not justified on any evidence and, thus, is not soundly-based. In this context, RPS considers that there is evidence available which demonstrates that a higher proportional contribution is justified and should be incorporated into the SLP. To do this, RPS has considered evidence relating to recent migration trends between Shropshire and the West Midlands (including the Black Country and Birmingham) given the 'functional relationship' that exists between Shropshire and the Black Country/West Midlands conurbation.

3.1.29

Migration Trends

Data published by Office for National Statistics (ONS) allows users to analyse the numbers of people who move between local authority areas within the UK each year¹⁵. This is known as 'internal migration'. By looking at this data, RPS has analysed the numbers of people moving into Shropshire from the Black Country since 2016, which corresponds with the base date of the SLP. RPS considers this to provide a credible basis for determining a reasonable 'proportional contribution' of homes to address the identified housing shortfall in the Black Country. This is because migration is a key input to population and household change at the local authority level and ONS data represents up to date, accurate and relevant information in this regard.

3.1.30

3.1.31

Table 3.5 below summarises the number (and proportions) of people moving to Shropshire from the Black Country between 2016 and 2019 (the latest available year of data). In addition, figures also show the effect of taking into account the number of moves from Birmingham.

Table 3.5 Moves to Shropshire from the Black Country / Birmingham 2016-2019

| ONS migration figures | | | | | |
|------------------------------|---------------------------|---|--|-----------------------------|--|
| (no. of people, per annum) | Total moves to Shropshire | Moves to Shropshire from BC authorities (| to Proportion from moves from the BC (| of Moves from BC Birmingham | Proportion of moves from BC and Birmingham |
| | |) | %) | | |
| 2019 | 15,087 | 1,377 | 9.1% | 1,879 | 12.5% |
| 2018 | 11,970 | 1,280 | 10.6% | 1,783 | 14.9% |

¹⁴ Based on the range of identified housing shortfall for the Black Country, the contribution of 1,500 dwellings is between 5.1% and 5.6%

¹⁵ Internal migration - Matrices of moves between local authorities and regions (including the countries of Wales, Scotland and Northern Ireland), ONS, year ending June (2016-2019)

| | | | | | |
|------|--------|-------|------|-------|-------|
| 2017 | 14,940 | 1,240 | 8.2% | 1,700 | 11.4% |
| 2016 | 12,060 | 890 | 7.3% | 1,210 | 10% |

Source: Internal migration - Matrices of moves between local authorities and regions (including the countries of Wales, Scotland and Northern Ireland), ONS, year ending June (2016-2019)

As can be seen, recent moves into Shropshire from the West Midlands conurbation (including Birmingham) have consistently been in excess of 10%, with slightly lower rates of moves from the Black Country. On this basis, RPS considers there is clear evidence that the contribution to be accommodated in Shropshire should be higher than the 5% currently proposed (which is reduced to 4.4% based on the updated Black Country shortfall set out in Table 3.4 above¹⁶).

3.1.32

Accordingly, RPS contend that a contribution of c.10% would better reflect the evidence based on recent migration trends outlined above. This would result in an increase to the contribution for 1,500 to 3,419 dwellings, based on the updated housing shortfall identified in Table 3.4 above, representing an increase of 1,919 dwellings. This increase (1,919 dwellings) should therefore be added to the proposed housing requirement of 30,800 dwellings to reflect the fact that the contribution towards the unmet need is over and above the local housing need in Shropshire, not a part of it.

3.1.33

This results in a revised housing requirement **of at least 32,719 dwellings** (30,800 plus 1,919) for the SLP up to 2038.

3.1.34

Assigning sites to deliver the contribution

Furthermore, it is not clearly explained anywhere in the Pre-Submission draft SLP how the contribution is to be distributed across the Borough, in particular which sites will be identified as the means by which the contribution will be planned and delivered. RPS contends it is necessary to assign sites against the contribution in order that the Council can properly monitor progress of the SLP in delivering on its commitments and take the necessary actions where this is not happening as anticipated.

3.1.35

3.1.36

In this regard, and as stated in previous representations on behalf of TW, RPS would suggest that those sites that are 'assigned' to meeting this additional need should be based on a sequential approach that favours those sites deemed sustainable and deliverable and that are also located in relatively close proximity and which are accessible to the Black Country conurbation by public transport. In this regard, sites located in the eastern part of Shropshire and situated along the A41/M54/A5 corridor are considered to be most appropriate when compared to other locations in the Borough.

3.1.37

Therefore, without sufficient clarity on how the Council seeks to deliver the homes intended to contribute toward the identified housing shortfall the SLP is not effective or positively-prepared, and thus is not soundly-based.

3.1.38

Conclusions on Shropshire's Proposed Housing Requirement and DtC

In light of the concerns set out above, RPS does not support the proposed housing requirement of 30,800 dwellings over the plan period. As stated in the SLP (paragraph 3.8, 3.10 and 3.11

¹⁶ 1,500 is 4.4% of 34,190, as defined in Table 3.3 of this submission

refers) this figure represents an annual average growth rate of 1,400 dpa. This is significantly lower than recent trends in housing delivery since the beginning of the plan period (1,876 dpa) and thus, contrary to the Council’s position, this does not represent a ‘high growth’ strategy. In fact, to plan for the delivery of 1,400 dwellings per year would constitute a ‘plan for decline’ when considered against recent delivery rates seen in Shropshire. Consequently, whilst RPS is not advocating the use of an alternative approach to the standard method calculation in determining Shropshire’s local housing need, RPS contends that greater consideration should be given to more recent development trends that supersede the base year of the 2014-based household projections.

3.1.39 In addition, RPS contend that the proposed ‘soft’ commitment within the SLP to take 1,500 of the Black Country’s identified housing shortfall falls considerably short of what a reasonable contribution would be based on recent trends in migration between the areas. Consequently, RPS suggests that a contribution of around 10% would be a more reasonable approach. When applying the increase contribution to the proposed housing requirement (currently 30,800 dwellings) this would increase the requirement to 32,719 dwellings.

3.1.40 In this context, RPS consider that Albrighton should be a focus for additional growth, and that the Land at Cross Road (ALB014) provides a suitably sustainable location to accommodate additional development within the settlement. This also provides further support and justification for the release of the Site from the Green Belt and its specific allocation for residential development, rather than the current proposal to simply safeguard the Site for consideration beyond 2038.

Policy SP2 – Strategic Approach – Distribution of Development

3.1.41 **Planning for Growth at Key Centres**

3.1.42 RPS notes that the distribution strategy of the Pre-Submission draft SLP remains largely unchanged following previous consultation responses. RPS acknowledges that Policy SP2.1 (Urban Locations) maintains Albrighton’s role as a Key Centre. Nonetheless, RPS raises concerns with the overall approach to distribution of housing across Shropshire, in particular the level of growth directed to Albrighton over the plan period. These concerns are reinstated and reaffirmed under the response to Policy S1 (see Chapter 4 of this submission).

At this point, RPS notes that Policy SP2 (point 5 refers) seeks to deliver,

3.1.43 *“...a sustainable and appropriate pattern of development which also maximises investment opportunities...”. Specifically, Key Centres will, “...accommodate significant well-designed new housing and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential...” (criterion 5b, emphasis added).*

Notably, Key Centres are identified as the third tier of ‘Urban Location’ are therefore behind only Principal Centres and Shrewsbury in the SLP settlement hierarchy (Policy SP2, Schedule SP2.1), ahead of Community Hubs and Clusters (which are listed under Schedule SP2.2 and 2.3 respectively).

In this context, the proposed development strategy set out in the current consultation SLP maintains the ‘urban focused’ approach to the distribution of development and the housing

requirement across Shropshire previously consulted on. For reference, Table 3.6 below illustrates the position at the Preferred Sites consultation stage (January 2019).

It can therefore be seen that the Council applied the apportionment of 18% of the overall requirement (or 5,150 dwellings) to the eleven Key Centres, including Albrighton (paragraph 3.1 of the Preferred Sites consultation document refers). The level of housing growth proposed at Albrighton between 2016 and 2038 in the Plan review is 500 dwellings. This figure represents 9.7% of the total apportionment for the Key Centres, or 1.6% of the overall housing requirement consulted on at the time (28,750 dwellings).

3.1.45

Table 3.6 Summary of Proposed Distribution Strategy – Shropshire Local Plan Review

| Proposed locations for development | Proportion of distribution |
|------------------------------------|----------------------------|
| Shrewsbury | 30% |
| Principal Centres | 24.5% |
| Key Centres | 18% |
| Rural Areas | 27.5% |
| Total | 100% |

Source: *Shropshire Local Plan Review: Consultation on Preferred Sites November 2018-Jan 2019, p5*

3.1.46

The latest position (December 2020) regarding the distribution of growth across Shropshire can be updated based on information set out in the Pre-Submission SLP document (Appendix 5 refers). The appendix sets out two tables which show the breakdown of total supply across the various settlement categories (Strategic Centre; Principal Centres; Key Centres; Community Hubs; elsewhere beyond). Table 3.7 below summarises the latest position based on that data.

Table 3.7 Summary of Proposed Distribution Strategy – Draft Shropshire Local Plan 2020

| Proposed locations for development | No. of dwellings ¹⁷ | Proportion of distribution |
|------------------------------------|--------------------------------|----------------------------|
| Shrewsbury | 8,625 | 28% |
| Principal Centres | 7,500 | 24.3% |
| Key Centres | 5,150 | 16.7% |
| Rural Areas ¹⁸ | 9,525 | 31% |
| Total | 30,800 | 100% |

Source: *Pre-Submission Draft Shropshire Local Plan Regulation 19 Consultation, Appendix 5 (Schedules A5(i), A5(ii) and A5.5)*

¹⁷ Taken from Pre-Submission Draft SLP, Appendix 5: Residential Development Guidelines and Residential Supply

¹⁸ The figure for 'Rural Areas' is the difference between 30,800 and the totals for the other categories listed in Table 3.7

3.1.47 Based on the updated figures set out in Table 3.7, RPS maintains its position regarding the over-emphasis being placed on rural areas within the preferred distribution strategy. The figures show that the distribution of 31% of the total amount of development to the rural area is significantly higher compared to just 16.7% in those Key Centres (including Albrighton) acknowledged as being more sustainable locations. In terms of a breakdown of the housing requirement in Table 3.7, this would equate to 9,525 dwellings dispersed across the rural area, and only 5,150 homes at Key Centres. RPS therefore contends that this is more akin to a 'dispersal' strategy rather than one which seeks to focus growth at the most sustainable locations.

3.1.48 Furthermore, when compared to the position taken by the Council at the Preferred Sites stage in 2019 (summarised in Table 3.6 above) the distribution of growth now proposed represents a dilution of Key Centres in favour of greater dispersal of growth to the rural area at their expense. Such an approach does not fit with an 'urban focused' strategy in the SLP and is also illogical in terms of setting a strategy that seeks to direct development away from settlements accepted as being more sustainable than rural parts of the Borough. The result is that the guideline figures for Albrighton is constrained to fit with the proposed strategy distribution, rather than reflecting the opportunities that exist through the Plan to deliver additional growth in the most sustainable parts of the Borough.

3.1.49 On this basis, the distribution strategy seeking to focus only 16% of future housing growth on Key Centres but nearly a third (31%) of the areas housing growth on rural locations is inconsistent with an 'urban focused' spatial approach which seeks to direct 'significant' levels of growth towards the urban locations identified in Schedule SP2.1, including Albrighton. The effect of this is more likely to limit, rather than maximise, the economic potential of Key Centres as intended under Policy SP2. RPS contends that the lack of focus on Key Centres, in proportionate terms, compared to other less sustainable has not been justified and does not represent positive planning, meaning that Policy SP2 is not soundly-based.

3.1.50 **Consistency between Housing and Economic Strategies**

Another aspect of inconsistency evident within the SLP is between the housing and economic strategies underpinning the distribution of growth in Shropshire. As discussed previously, the housing dimension of the spatial strategy is set out in Policy SP2. The supporting text to Policy SP2 states at paragraph 3.28 that the,

"...strategic approach also responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections.

3.1.51 *"The SLP (at paragraph 3.28) lists the various proposed 'strategic corridors', including:*

a. Eastern Belt M54/A5/A41/A464/A5 and A454/A458, supporting Shropshire's links to the West Midlands region and the role of the West Midlands Combined Authority, including opportunities around Bridgnorth as a Principal Centre within the context of the ongoing Green Belt Review;..."

The economic dimension of the spatial strategy is set out in Policy SP12 and SP14 of the SLP. RPS acknowledges that Policy SP12 (Shropshire Economic Growth Strategy), under criterion 1, promotes the 'economic potential' of Shropshire and, under criterion 3, by directing economic

growth and investment in line with the settlement hierarchy set out under SP2. Policy SP12 also highlights 'strategic corridors' as third in the list of preferable locations for growth, alongside 'Strategic Settlements' and 'Strategic Sites' stated in criterion 3c, ahead of all other locations.

Under Policy SP14 (Strategic Corridors) RPS notes in the opening sentence of the policy that the SLP seeks to,

3.1.52 *"...deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity..."*

3.1.53 Criterion 3 to Policy SP14 sets out the sequential approach to development within the strategic corridors. Again, this broadly aligns with the settlement hierarchy in Policy SP2 and SP12 highlighted above, but notably does not distinguish between the type of centre (either Strategic, Principal or Key Centre) instead the policy categorises all centres under a single (first preference) sequential approach where sites are proposed for allocation in the SLP. The approach would also favour sites not allocated in the SLP but which are brought forward for development to be located 'immediately adjoining Shrewsbury or a Principal or Key Centre' (criterion 3c).

3.1.54 In addition, in the supporting text to Policy SP14, the SLP provides a breakdown of each Strategic Corridor with reference to specific locations along each of them. As highlighted above, the first Strategic Corridor is defined as 'Eastern Belt M54/A5/A41/A464/A5 and A454/A458' supporting Shropshire's links to the West Midlands region. Notably, the SLP identifies Albrighton as a Key Centre within this corridor (paragraph 3.142 refers).

3.1.55 It is clear therefore that the economic strategy underpinning the SLP recognises the importance of focusing growth and development within strategic corridors as part of delivering a 'step change' in the economic performance of Shropshire. The first of these corridors is focused along the eastern corridor along the M54/A41/A5, and which, as accepted by the Council, includes Albrighton. However, this is not reflected in the housing growth strategy as set out in Policy SP2, which makes no reference to the contribution that residential development within Strategic Corridors can make towards delivering the overall growth strategy for Shropshire up to 2038 (the only reference made is in the supporting text to Policy SP2 at paragraph 3.28, highlighted above). It is therefore wrong for the SLP to state, in criterion 1 to Policy SP14, that,

3.1.56 *"The strategic approach in Policy SP2 seeks to deliver significant development and infrastructure investment within the 'strategic corridors' served by the principal rail network and strategic and principal road networks in Shropshire."*

3.1.57 On this basis, RPS contends that the housing and economic strands of the spatial strategy are not sufficiently integrated and therefore represents a lack of clarity in the SLP. Without sufficient clarity, the SLP is not 'clear and unambiguous' in relation to the status and purpose of Strategic Corridors with respect to housing development. Because of this, the SLP is contrary to national policy¹⁹ and is not therefore soundly-based.

In summary, the contradictory approach within Policy SP2 identified with regards to planning for Key Centres, and the lack of consistency shown between the housing (SP2) and economic

¹⁹ NPPF 2019, paragraph 16(d)

strategies (Policy SP12 and SP14) of the SLP demonstrates that the SLP does not accord with the need for plans to be positively prepared as required by national policy²⁰. Consequently, RPS considers that the SLP lacks sufficient coherence and internal consistency between the various policy strands, which renders the SLP unsound on these grounds.

3.1.58 Furthermore, the contradictions, inconsistencies, and ambiguities in the SLP as demonstrated above, has clear implications for Albrighton, where growth will be restricted and thus undermine its intended and potential role within the overall spatial strategy. At present, the level of growth planned for Albrighton completely ignores the wider economic objectives in the SLP. The delivery of 500 homes over the next 18 years at Albrighton represents just 22 homes per year and is therefore unlikely to contribute significantly to delivering the objectives under this policy.

3.1.59 In order to assist the examination process, RPS suggests that these soundness concerns can be addressed through the identification of additional growth at Albrighton consistent with its location along one of the Borough's identified 'strategic corridors' under Policy SP14.

3.1.60 Further responses on the soundness of the strategy for Albrighton are presented in submissions to Policy S1 set out in the next chapter of this submission.

²⁰ NPPF 2019, paragraph 35

4 REPRESENTATIONS ON DRAFT SETTLEMENT POLICIES

This chapter of the representations are made in response to Policy S1 (Albrighton Place Plan Area).

Policy S1 – Albrighton Place Area

4.1.1 Albrighton benefits from excellent accessibility to Telford and Wolverhampton, being linked by a railway station and the M54 and A41. It also lies in close proximity (less than 1.5km) to RAF Cosford, which is likely to be the subject of MOD investment and housing need during the plan period. The Council had previously identified Cosford as a '*strategic opportunity*' within the Local Plan review to complement the existing and potential future uses of the RAF base, as well as the role Cosford can play in supporting the investment priorities linked to the wider West Midlands Engine.

4.1.2

4.1.3 The SLP now proposes to allocate the RAF Cosford as a Strategic Site for non-residential/commercial development (under Policy S21). Reference is made in this policy (criterion 2 refers) that recognises the need to maintain the strategic gap by way of retaining the existing the existing Green Belt between the two localities of Albrighton and Cosford. RPS acknowledges that this would appear to take into account evidence in the Council's Green Belt Assessment (GBA), which reflected on the, '*...proximity and inter-relationship between Cosford and Albrighton, the latter being a key centre, when considering future development needs and the Green Belt Study in this part of Shropshire*'²¹. It is noted that the gap in question is located to the northwest of Albrighton and south-east of Cosford respectively, thus limiting the potential for future growth in that direction.

4.1.4 Based on this, it is crucial that the Council considers the potential for Albrighton to accommodate additional growth emanating from Cosford, recognising the role that Albrighton plays in the settlement hierarchy. Albrighton settlement provides a highly sustainable location for residential development, as demonstrated in this submission, to accommodate additional development that can assist in meeting a proportion of the likely future needs emanating from Cosford. Any such growth should, based on the findings of the GBA, be directed away from the north-west of Albrighton where the impacts on the gaps are reduced. In this context, land at Cross Road offers an appropriate location which would not impact at all on this gap.

4.1.5

Development Strategy for Albrighton

Policy S1 of the SLP sets out the proposed development strategy for Albrighton. The proposed strategy takes forward the preferred approach consulted on at the Preferred Sites Consultation Document (Section 4 refers), which in turn expanded on information set out in Appendix 3 (Settlement Strategies) of the Preferred Scale and Distribution Consultation document in relation to Albrighton. Consequently, the proposed development strategy for Albrighton set out in Policy S1 remains unchanged following all these previous consultations, with provision for 500 dwellings and 5 hectares of employment land, albeit over a slightly longer plan period (2016-38).

²¹ Shropshire Green Belt Assessment, November 2018, Appendix 4, p165

4.1.6 It is significant to note that, despite the increase in the overall housing requirement from 28,750 to 30,800 dwellings (delivered at a slightly lower annual rate due to extending the plan period by an extra two years), the allocation of additional land at Albrighton has actually decreased from 195 dwellings in the Preferred Sites Consultation document (see table at paragraph 4.26 of the consultation) down to just 180 dwellings in the SLP (Schedule A5i refers). This reduction in allocations limits the potential to deliver additional growth at Albrighton in order to support the wider SLP growth agenda, tackle local infrastructure priorities, as well as address the chronic under-delivery at Albrighton since 2006.

4.1.7 Despite this, the proposed development strategy (under Policy SP2) recognises that Albrighton will continue to act as a Key Centre and contribute towards the strategic growth objectives in the east of the County. However, as set out in Table 4.1 below, the level of historical completions from 2006–19 at Albrighton was only 66 (equating to just 5 dwellings a year on average). This remains the lowest level of completions of any of the Principal and Key Centres in Shropshire since 2006. Development has therefore been extremely limited, reflecting the constraints of the Green Belt. Of this, there has only been limited delivery of 24 dwellings within the first three years of the new plan period (2016-2019), or 8 dwellings on average.

Table 4.1 Housing Completions in Shropshire by Settlement: 2006-19

| Settlement | Completions (2006-19) | % of Completions (2006-19) | Settlement Type |
|-------------------------|-----------------------|----------------------------|-------------------|
| Albrighton | 66 | 0.40% | Key Centre |
| RURAL ²² | 5,415 | 32.80% | Rural |
| Shrewsbury | 4,371 | 26.40% | Strategic |
| Oswestry | 996 | 6.02% | Principal |
| Bridgnorth | 757 | 4.58% | Principal |
| Shifnal | 1,106 | 6.70% | Key |
| Market Drayton | 502 | 3.03% | Principal |
| Whitchurch | 570 | 3.44% | Principal |
| Ludlow | 480 | 2.90% | Principal |
| Wem | 426 | 2.58% | Key |
| Ellesmere | 395 | 2.39% | Key |
| Cleobury Mortimer | 308 | 1.86% | Key |
| Church Stretton | 213 | 1.29% | Key |
| Highley | 181 | 1.1% | Key |
| Minsterley & Pontesbury | 211 | 1.28% | Key |
| Broseley | 213 | 1.29% | Key |
| Craven Arms | 110 | 0.67% | Key |

²² Total figures taken from Table 14 and Table 15 of the Shropshire Five-year Land Supply Statement 2019, dated 16th March 2020

| | | | |
|----------------|---------------|-------------|-----|
| Much Wenlock | 127 | 0.78% | Key |
| Bishops Castle | 84 | 0.51% | Key |
| Total: | 16,531 | 100% | |

Source: Shropshire Housing Land Supply Statement 2019 (Table 13; Table 14; and Table 15); RPS

4.1.8 Based on this, housing delivery at Albrighton has been extremely modest, principally reflecting the constraints of the Green Belt. The Council acknowledges this problem. Therefore, RPS contend that in order to deliver the 'step change' in the scale of development, not only should Green Belt land be released (which RPS supports in relation to Land at Cross Road) but the Plan should go further and specifically allocate additional land as part of the Local Plan review, over and above the 180 dwellings currently allocated to Albrighton. This would be wholly in line with the role that Albrighton is expected to play in delivering the overall development ('urban focused') strategy, be consistent with the wider housing and economic agenda in Shropshire in relation to focusing growth on major 'strategic corridors', as well as providing further flexibility and boosting the supply of housing in line with national policy²³.

4.1.9 In light of this, RPS contend that a proportional increase in the housing guideline figure (500) for Albrighton is justified to reflect this and a number of other factors, including; , the chronic under-delivery of housing at Albrighton since 2006, the proper recognition of Albrighton's strategic position in the Borough within close proximity to the West Midlands conurbation, as well as Albrighton's position along oone of the key 'strategic corridors' in the SLP is defined as '*Eastern Belt M54/A5/A41/A464/A5 and A454/A458*' supporting Shropshire's links to the West Midlands region discussed in submissions on Policy SP2 above.

4.1.10 Consequently, in order for the SLP to be considered soundly-based, RPS contends that growth at Albrighton should reflect not only local need but also recognise the opportunities that exist at the settlement to support greater levels of development consistent with the wider housing and economic agenda of the SLP. For these reasons, and consistent with representation made on Policy SP2 (and SP12 and SP14) above, RPS contends that the strategy for Albrighton SLP is not justified and has not been positively prepared, and therefore not soundly-based.

4.1.11

Approach to Windfalls

RPS also has reservations with the approach taken to the reliance on windfall development in the SLP, including at Albrighton itself. Paragraph 70 of the NPPF clearly sets out the relevant tests to be applied when considering making an allowance for windfall sites within the overall supply of housing. It states that where such an allowance is to be made, as in Shropshire's case, there should be '*...compelling evidence that they will provide a reliable source of supply....*'. It goes on to state that, "*...Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery and expected future trends.*" The annex to the NPPF defines windfall sites as *constituting any site not specifically identified in the development plan.*

²³ NPPF, 2019 paragraph 59

The Council has conducted a windfall assessment as part of the latest Strategic Land Availability Assessment (SLAA) 2018, and has published this as part of its evidence base. The SLAA suggests that, since 2006, an average of 382 dwellings have been delivered each year from windfall sources across the Plan area (sites less than 5 dwellings). The SLAA goes on to argue (paragraph 5.7 refers) that windfall development will "...continue to represent an important part of the housing land supply."

4.1.12

The SLAA has assessed past trends in supply from windfall sites at a borough-wide level, but has not carried out any analysis regarding the distribution of past windfalls across the various settlements in the borough. This is important because the Preferred Sites Consultation (at paragraph 3.1) proposed to apply windfall allowances for each individual settlement, calculated simply as the residual of the headline allocation required minus the capacity of the proposed allocations.

4.1.13

The allowance applied specifically at Albrighton remains 48 dwellings up to 2038. When added to the local plan allocation of 180 dwellings, this represents 21% of the total additional identified supply in the SLP.

4.1.14

RPS does not agree with this approach. The Council has not presented the 'compelling case' for the windfall allowance at Albrighton, as required by the NPPF. In order to be credible, any windfall allowance at the settlement-level should be based on an assessment of likely future supply, in line with the NPPF, carried out at the scale of the settlement. This would then inform the allowance to be applied at Albrighton.

4.1.15

In reality, it is our view that the windfall allowance has been applied in order to limit the allocation of additional sites needed to meet the proposed housing requirement (or 'Guideline') of 500 dwellings at Albrighton by 2038. We do not agree with this approach. This is because the supply of housing within the built-up area of Albrighton since 2006 has been limited (just 66 dwellings, or 5 dwellings per annum) compared to other non-Green Belt settlements where boundaries are not so tightly drawn. In fact, housing delivery at Albrighton has been the lowest of any Market Town or Key Centre (Table 13 of the Shropshire five-year Land Supply Statement 2019-2024 refers).

4.1.16

4.1.17

Consequently, RPS considers that the Plan should go further than currently drafted and allocate additional land where opportunities exist to deliver new development in sustainable locations that do not undermine the purposes of the Green Belt (most notably on Land at Cross Road/ALB014) before any allowance is made for windfalls. In this way, the windfall allowance would represent a 'buffer' that can help ensure the required growth at Albrighton is achieved. This would be more consistent with a plan-led approach to meeting housing needs, rather than relying on supply from unknown sources that may or may not come to fruition i.e windfall sites, without sufficient justification.

4.1.18

Consequently, for these reasons, RPS contends that the SLP approach to accounting for windfall development is not justified, nor is it consistent with national policy and the need to plan positively by making sufficient provision for housing²⁴.

²⁴ NPPF 2019, paragraph 20

Albrighton's amended development boundary

4.1.19 In addition, under Policy S1 proposes an amended development boundary is proposed, which will guide development in Albrighton over the plan period. RPS has submitted representation on this matter during previous rounds of the local plan consultation process. RPS maintains its objection to the development boundary as proposed, on the basis that the boundary around this highly sustainable settlement remains too tightly drawn in an attempt to limit the alterations to the inner boundary of the Green Belt. By drawing the boundary so tight around Albrighton, it is less able to flex and adapt to rapid change, as required by paragraph 11a of the NPPF, for example in instances where known allocations do not proceed as anticipated. Consequently, it would be sensible to build more flexibility into the plan at the outset, through the identification of additional sites, rather than drawing a boundary that restricts the Council's options in dealing with unforeseen circumstances in the future.

4.1.20 In relation to the Land at Cross Road, RPS considers that there is no evidence to suggest that the Site cannot be specifically identified for development within the amended plan period (now 2016 to 2038). Consequently, the Council's approach to the settlement strategy and defining the settlement boundary at Albrighton is not justified and does not represent positive planning, thus it is not soundly-based.

Safeguarding land at Albrighton

4.1.21 Policy S1 also states,

4.1.22 *"To provide long-term locations for growth, three areas of land beyond the Albrighton development boundary that are not part of the Green Belt are safeguarded for Albrighton's future development needs beyond the current Local Plan period. This land is set out in Schedule S1.1(ii) and identified on the Policies Map. Safeguarded land is not allocated for development at the present time, rather it has been safeguarded for Albrighton's future development needs beyond the current Local Plan period."*

4.1.23 In response, RPS notes that Land at Cross Road, Albrighton, otherwise referenced as 'P36/ALB014' in the SLAA 2018, was identified previously in the Preferred Sites Consultation document as 'Proposed Safeguarded Land for development beyond 2036' contiguous to, but outside, the proposed development boundary for Albrighton. RPS supports the recognition that the Site should be considered distinct from other parts of the Green Belt around Albrighton, and therefore proposed for removal from the Green Belt. RPS also supports the recognition that development of the Site has potential and is acceptable in principle, given the Council's own position following its review of the Green Belt at Albrighton, and that the Site has potential for development at some time in the future without undermining the purpose of the Green Belt as it relates to Albrighton.

However, as demonstrated elsewhere in this submission, greater consideration could be given to the allocation of additional sites at Albrighton, notably Land at Cross Road which is currently proposed as safeguarded land until 2038. The allocation of the Site would ensure that the Plan is not only sufficiently flexible in terms of the supply of sites, and would ensure a range of sites are available to the local market, but would also contribute towards the need for additional land to address, in part, the shortcomings with the proposed housing requirements discussed earlier in this submission (paragraphs 3.1.4-3.1.37). This includes the contribution that Shropshire, and Albrighton specifically, can make to addressing the unmet needs of neighbouring areas, in a

location that lies within close proximity to good transport connections (road and rail) to the conurbation.

To this end, therefore, RPS suggests that the Council should go further than merely designating the Site as safeguarded land and allocate the Site for residential development in the SLP to be brought forward for development before 2038. To do so would go some way towards addressing the soundness concerns identified in this submission.

4.1.24

5 REPRESENTATIONS ON OTHER POLICIES

RPS wishes to submit representations on a number of other policies in the SLP, including certain non-strategic (development management) policies.

Policy SP1 The Shropshire Test

5.1.1 The Council define Policy SP1 as a 'gateway' policy (SLP paragraph 3.1 refers) which, '... establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner...', which has been drawn from the 'Shrewsbury Big Town Plan'.
 5.1.2 However, new development proposals would already be assessed against the other policies in the SLP, which themselves cover the issues identified in SP1. Consequently, there is a risk of duplication within the SLP that could result in confusion for users of the SLP in terms of how this policy should be applied in light of other policies that cover topic-specific issues in greater detail.

5.1.3 On this basis, RPS see no planning benefit in retaining this policy, given the acceptance in the SLP that, "The remaining strategic and development management policies of this Plan elaborate on the issues." (paragraph 3.2 refers). Whilst recognising the stated intention of including the policy, RPS nonetheless, suggests the policy should be deleted, for the sake of clarity and succinctness.

SP5 High-Quality Design

5.1.4 This policy sets out a range of criteria that seeks to deliver, "...high quality design by ensuring the creation of better places in which to live and work, improving sustainability, supporting active and healthy lifestyles and ensuring individual and community well-being" (criterion 1). The policy then goes on to define 14 design 'principles' to be applied to all new development.
 5.1.5

Notably, criterion 2 states:

5.1.6 *"Development must maintain and enhance the character, appearance and historic interests of settlements, streetscenes, groups of buildings, individual buildings and the landscape and, reinforce the hierarchy of networks and spaces in accordance with national planning policy and the design principles set out in the West Midlands Design Charter."*

Whilst national policy advises that, "...Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable..." such certainty should not come at the expense of flexibility. At present, the wording in criterion 2 is overly-prescriptive and reduces the ability of applicants to devise creative and innovative solutions to address particular site or locational considerations relevant to individual proposals. Such an approach is therefore contrary to national policy, which advises that developments,

"... are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change..."²⁵

²⁵ NPPF 2019 paragraph 127(c)

On this basis, criterion 2 of Policy SP5 is inconsistent with national policy because of the use of the word 'must'. Furthermore, the policy is also not justified because the SLP presents no evidence to demonstrate that such a prescriptive approach is warranted in Shropshire. Therefore, to bring the wording into line with national policy, the word 'must' should be replaced by more appropriate wording that reflects national policy objectives on design.

5.1.7 **Policy SP7 Managing Housing Development**

5.1.8 The intention of this policy is to establish an arbitrary 'cap' on the number of dwellings that can be delivered at any given settlement location during the plan period by allowing the decision-makers to apply a 'two-stage' process in determining planning applications for housing development. As drafted, the policy would be applicable to 'all' housing development regardless of location, even where this was proposed at the most sustainable locations, these being the Strategic, Principal and Key Centres.

5.1.9 The first stage would be for the decision-maker to determine the application against the policies in the SLP in the normal fashion (i.e. in accordance with s38(6) of the Planning and Compulsory Purchase Act 1990). The second stage, however, would be applied once the decision-maker has determined that the application complies with the development plan, and would therefore 'trigger' the application of four additional considerations stated under criterion 3 of the policy. RPS objects to the inclusion of a 'two-stage approach' to determining planning applications under this policy.

5.1.10 Firstly, the Council presents no evidence to justify the inclusion of such an approach under criterion 3, including the need to demonstrate that exceeding the residential guidelines is likely to cause adverse harm.

5.1.11 Secondly, the residential guidelines to which this criterion relate are not based on 'maxima' or 'caps' or an other 'limitation' on the number of homes that could be delivered at any given settlement, therefore RPS questions the need for it. Therefore, seeking to apply a 'cap' on development is at clear odds with the purpose of using 'guidelines'.

5.1.12 Thirdly, the inclusion of the additional criterion would appear to be an attempt by the Council to define, in policy, what material circumstances should be applied by the decision-maker once he or she has assessed the proposal through the normal exercise in accordance with the law. However, it is not the purpose of the development plan to define those considerations that might be relevant to determining a particular proposal, but to define policy informed by evidence.

5.1.13 And fourthly, RPS questions the necessity for the additional criterion given that the SLP contains a range of policies (for example, policies for controlling development in the countryside – SP10) that allows the decision-maker to determine whether or not proposals are acceptable in planning terms.

5.1.14 On this basis, RPS contends that criterion 3 of SP7 is not soundly-based and therefore recommends that it be deleted prior to submission of the SLP for examination.

SP11 Green Belt and Safeguarded Land

Under this policy, the SLP proposes to remove Land at Cross Road, Albrighton (Site reference ALB014) from the adopted Green Belt and safeguard it for future development beyond the end of the plan period (2038) as shown on the SLP policies map.

In response, RPS is supportive of the proposed removal of this parcel of land from the Green Belt. Further detail on this is provided in Sections 7 and 8 of these representations, which needs to be addressed in the context of Policy SP11. However we object to the Site being proposed as safeguarded land but should be allocated for residential development in the SLP through the local plan review, based on the case outlined above regarding the need for positive allocations to be made at Albrighton. This is consistent with our main representations submitted here, and previously submitted through earlier rounds of public consultation.

5.1.16

Further information submitted in response to Policy SP11 is set out in chapter 7 of these representations, which focuses on Exceptional Circumstances relating to the proposed release of Land at Cross Road, Albrighton.

5.1.17

Policy DP1 Residential Mix

This policy seeks to impose a number of restrictions on the design and layout of new housing development, with specific reference to implementing the government's nationally described space standards and the optional technical standards for accessible and adaptable housing. This includes (at criterion 5) the proposal to require 'at least' 5% of dwellings on sites of five or more dwellings to meet M4(3) wheelchair user standards, and 70% of the dwellings will be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations, unless site-specific factors indicate that step-free access cannot be achieved.

5.1.18

RPS acknowledges that the need for housing that meets the specific needs of certain household and age groups in the community is likely to increase nationally due to the general ageing of the population. However, the Framework (at footnote 46) is clear that any such requirements as those proposed in the dSLP must, "...address an identified need for such properties..." (regarding the optional technical standards), and only be applied "...where the need for an internal space standard can be justified."

5.1.19

5.1.20

With reference to the optional technical standards specifically, the SLP relies on information regarding wheelchair use in households nationally, as well as the demographics of Shropshire, as justification for the specific policy requirement set out in Policy DP1. However, RPS questions whether this is a sufficient evidential basis for the policy, given that there is no locally-specific evidence presented in the SLP beyond simply references to broad demographic projections (paragraphs 4.21 to 4.26 refers).

5.1.21

5.1.22

Accordingly, RPS suggests that the 'requirement' for such provision should be loosened to reflect the lack of specific justification in Shropshire for need for such properties, in accordance with national policy.

In addition, the policy also seeks to establish the requirement for the provision of "...an appropriate range..." of specialist housing for the elderly on all site of 50 dwellings or more. RPS objects to this proposal on the grounds of lack of justification that the policy is necessary and would be deliverable and viable, given the lack of any specific evidence to support this in the dSLP. Furthermore, such a requirement is also contrary to national policy, which does not specifically require the provision of such housing to meet specific needs akin to an affordable housing policy (as is the case based on guidance set out in paragraph 62 of the Framework).

5.1.23

Lastly, the policy makes clear that the mix of housing to be delivered on sites will need to be in accordance with the Shropshire Strategic Housing Market Assessment (SSHMA) and other local

needs survey evidence. However, this only relates to the needs of local (Shropshire-based residents) and does not reflect the needs of those households who would form part of the housing element over-and-above that which relates to 'shropshire-only' housing needs, including the unmet need element emanating from outside the area.

On this basis, RPS suggests the wording of the policy is not soundly-based (not justified or consistent with national policy) so should be significantly revised to reflect both local evidence and national policy.

DP3 Affordable Housing Provision

5.1.24

RPS acknowledges the criteria-based approach to securing on-site provision of affordable housing as a matter principle, with caveats to allow for circumstances where viability may impact on the ability of schemes to deliver the policy-compliant provision on site.

5.1.25

Nonetheless, RPS objects to the insertion of a planning condition into the policy regarding the need to transfer the affordable dwellings prior to completion of 50% of the consented open market housing. Firstly, this criteria is not necessary as such requirements are set out in planning conditions that accompany a grant of approval. Secondly, it may not be appropriate or viable to apply this criteria in such a prescriptive manner. Therefore, the issue of how such triggers should be applied to individual schemes should form part of the planning application process including how best to proceed in consultation with the applicant and any relevant Registered Provider also involved. Thirdly, circumstances or events may occur through the life of a consent and/or the build out of a site which may necessitate changes to such triggers.

5.1.26

5.1.27

Accordingly, RPS suggests the wording , "...and no later than at completion of 50% of the consented market housing..." should be deleted from the policy (criteria c.).

5.1.28

DP11 Minimising Carbon Emissions

5.1.29

RPS notes the inclusion in this policy (criterion 1b) reference to a requirement that new residential comprising 10 or more dwellings will achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations. In support for the policy, the Council considers that new development should reduce greenhouse gas emissions and that setting local requirements for building sustainability is justified (paragraph 4.110 refers).

5.1.30

However, it is not the purpose of development plans to repeat or restate standards that are applied through separate legislation. Similarly, whilst the Council considers that setting local standards or requirements for building sustainability is justified as a matter of principle, the Council presents no evidence to support the inclusion of standards already sought through Building Regulation, as is the case in criterion 1b.

Consequently, RPS contends that it is not appropriate or necessary to include specific reference to Building Regulations in a development plan policy and express this as a criteria to be applied to new development if such standards are sought in any event. RPS therefore suggest that criterion 1b is not soundly-based as it goes beyond the remit of planning policy, and should therefore be deleted.

DP12 The Natural Environment

Criterion 3 of the policy seeks to establish a borough-wide requirement for Biodiversity Net Gain (BNG) on all development proposals. It states:

" 3. Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22."

5.1.31

In addition, the supporting text to the policy states, at paragraph 4.121, that:

" The Environment Act will make it mandatory for housing and development to achieve at least a 10% net gain in value for biodiversity – a requirement that habitats for wildlife must be left in a measurably better state than before the development..."

5.1.32

And goes on to state, at paragraph 4.122, that:

" If net gain is not achievable on-site, the biodiversity gain plan will need to include off-site habitat enhancements, in line with the mitigation hierarchy..."

5.1.33

RPS objects to this policy criterion, as drafted, for the following reasons.

5.1.34

5.1.35

Firstly, the policy (including references made at paragraph 4.121 of the SLP) seeks the provision of 'at least 10%' net gains for biodiversity on 'all development'. However, the emerging legislation set out in the Environment Bill²⁶ clearly states that the biodiversity value percentage attributed to development is '10%', and not 'at least 10%' as suggested by the Council. The Council has therefore mis-interpreted the intentions in the draft Bill.

5.1.36

5.1.37

Secondly, the SLP provides no evidential basis for requiring a percentage increase above 10% in BNG on any development sites in Shropshire.

5.1.38

Thirdly, the policy and supporting text (with respect to paragraph 4.122) make no reference to the potential use of biodiversity credits as a means to secure the 10% BNG as part of new development proposals to be required under the Environment Act²⁷ (once it is enacted). The Biodiversity Credits approach will offer applicants the ability to off-set on-site measures by purchasing 'credits' in order to meet the gain objective.

Fourthly, and more fundamentally, RPS questions whether it is a sound approach to include references to emerging legislation that will, in any event, set down legal requirements for the provision of 10% BNG on all qualifying developments. RPS contends that, once enacted, there will be sufficient legal controls placed on development (brought forward through the amendments inserted into the Town and Country Planning Act 1990) to allow the Council to determine applications without the need for separate criterion as drafted under Policy SP12. RPS therefore contends that criterion 3 is not necessary with regards to addressing future requirements for BNG.

²⁶ Environment Bill 220 2019-21 (as amended in Public Committee), dated 27th November 2020, Schedule 14 (Biodiversity gain as condition of planning permission) Part 1 (Biodiversity gain condition), s90A, page 213

²⁷ Environment Bill 220 2019-21 , s94, page 94

Based on this, the SLP incorrectly references the draft Environment Bill and so must be amended in order that it is legally compliant. Also, RPS contends that there is no evidential basis for seeking BNG in excess of 10% in any event, and therefore the SLP is not soundly-based (not justified). More fundamentally, RPS considers it unnecessary to duplicate emerging legislation that will control aspects of development as drafted under criterion 3 of the policy. It's retention therefore renders the policy unsound (not effective and not positively-prepared).

5.1.39

DP15 Open Space

This policy at criterion 3, states that,

5.1.40

"... There is an expectation that new housing developments provides on-site open space provision equivalent to 30sqm per person, assuming one person per bedroom. However, consideration will be given to reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents..."

and goes on to state, at criterion 4, that:

5.1.41

"...For developments where an adverse effect on the integrity of an internationally or nationally designated wildlife site due to recreational impacts has been identified, particular consideration will be given to the need for semi-natural open space provision in excess of 30sqm per person..."

5.1.42

The policy therefore sets out specific requirements for the provision of at least 30sqm of open space per person assuming one person per bedroom. RPS questions the evidential basis for this requirement given the lack of any specific evidence in the SLP to justify the policy.

5.1.43

Alternatively, RPS suggests that rather than applying arbitrary standards across all developments to the provision of open space in a prescriptive manner as is being proposed, a 'design-led' approach specific to the locality would be a better approach to ensuring appropriate access of open space is incorporated and addressed as part of the wider design and layout of sustainable places.

5.1.44

Policy DP20 Water Efficiency

5.1.45

RPS notes the inclusion in this policy (criterion 1) reference to a requirement that new housing will be expected to meet the Building Regulations' 110 litres per person per day standard for water, as currently set out in Building Regulation *Approved Document G - Sanitation, hot water safety and water efficiency* (2015 edition with 2016 amendments).

5.1.46

Consistent with submissions on Policy DP11 above, it is not the purpose of development plans to repeat or restate standards that are applied through separate legislation. Similarly, whilst the Council considers that setting local standards or requirements for building sustainability is justified as a matter of principle, the Council presents no evidence to support the inclusion of standards already sought through Building Regulation, as is the case in criterion 1b.

Consequently, RPS contends that it is not appropriate or necessary to include specific reference to Building Regulations in a development plan policy and express this as a criteria to be applied to new development if such standards are sought in any event. The policy is therefore not soundly-based (not effective and positively prepared).

6 REPRESENTATIONS ON THE SITE SELECTION PROCESS

6.1.1 This chapter of the representations are made in response to the process Shropshire Council has taken in selecting the preferred allocations at Albrighton as set out in Policy S1 (Schedule S1.1(i) and S1.1(ii)). The site selection process has followed an approach based in part on work undertaken through the Sustainability Appraisal (stage 2a), and subsequently through site assessment separate to the SA that underpins the choice of sites allocated under Policy S1 (Stage 2b and 3). Therefore, for ease of reference and collation, RPS highlights in the commentary which stage of the process the representations relate to.

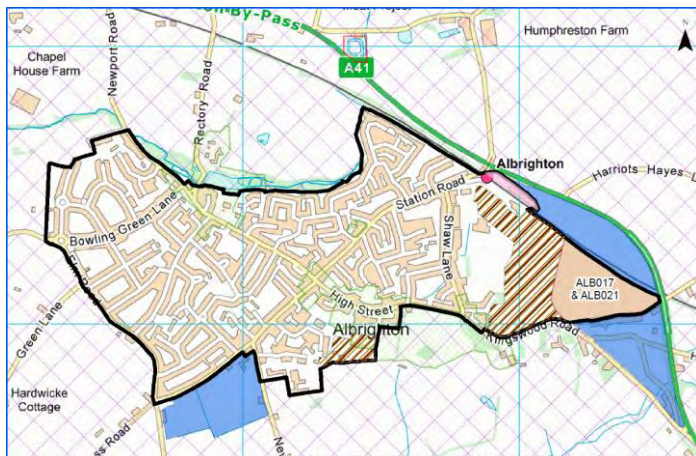
6.1.2 RPS has previously submitted representations to earlier rounds of public consultation on the SLPR process, in response to Council approach to site selection and sustainability appraisal as it related to Albrighton²⁸. The representations set out in this submission therefore provide an update in response to the latest information published by the Council alongside the SLP. RPS does, nonetheless, wish to retain those representations previously submitted at this stage.

6.1.3 RPS notes that the Council has issued an updated sustainability appraisal dated December 2020²⁹ ('Reg 19 SA') which includes the individual site assessments set out therein (Albrighton site assessments are set out in Appendix B of the Reg 19 SA report). The Reg 19 SA (Diagram 4.1 refers) summarises the stages followed in undertaking the SA of sites. Reference is therefore made to these updates, as necessary to support the objections set out in this submission.

Draft Shropshire Local Plan - Proposed Site Allocations in Albrighton

6.1.4 Figure 6.1 below provides an illustration of the draft site allocations extracted from the draft policies map for Albrighton.

Figure 6.1 – Shropshire Local Plan policies map – Albrighton Place Plan Area



²⁸ Preferred Scale and Distribution of Development consultation (2018) and Preferred Sites consultation (2018/19)

²⁹ Regulation 19 Pre-Submission Draft Shropshire Local Plan 2016 to 2038 Sustainability Appraisal and Site Assessment Environmental Report December 2020

Under draft Policy S1.1, the SLP proposes to roll forward two sites taken from the 'saved' policies in the Site Allocations and Management of Development Document (SAMDev) (shown brown hatching), and in addition proposes two new site allocations through the SLP process, but which were previously safeguarded for development (these being ALB017 and ALB021). Alongside this, the SLP proposes to the safeguarding of land previously identified as being in the Green Belt, namely; Land at Cross, Road (TW site, ALB014, shown in blue) and land to the east of Albrighton (sites P32a and P35 also shown in blue).

6.1.5

RPS sets out a number of concerns with the site selection process in more detail in the next section.

Site Selection and Sustainability Appraisal (SA)

6.1.6

This part of the representations relate to the sustainability appraisal of the Albrighton sites.

6.1.7

The national policy³⁰ makes clear that Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements³¹. In particular, the NPPF is clear that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

6.1.8

6.1.9

Furthermore, the national guidance³² also makes clear that the sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward, and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. In addition, the development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals at the appropriate stage in the process.

6.1.10

6.1.11

In light of the above policy and guidance, RPS does not agree with the approach taken by Shropshire Council in the selection of the preferred allocations at Albrighton.

6.1.12

Firstly, in order that plans can be judged 'sound' an appropriate strategy should be pursued, considering the reasonable alternatives. This is a slight change to the previous NPPF, which sought the adoption of the 'most' appropriate strategy. Nonetheless, the Council makes clear in the sustainability appraisal accompanying the SLP, dated December 2020 (paragraph 1.3 refers) that SA, "...can help make sure that plan proposals are the most appropriate given the reasonable alternatives...". RPS does not accept that the Council has followed its own advice in this instance.

The SA accompanying the Preferred Sites consultation (paragraph 2.14 refers) acknowledged that the SA process had directly informed the selection of the 'most' appropriate sites for allocation in each settlement. It is noted that the main bulk of the site assessments (Stages 2a, 2b and 3) have been undertaken within the scope of the SA itself (Stage 1 SLAA assessment being the exception). However, the Council has not selected the appropriate sites consistent with

³⁰ NPPF 2019.paragraph 32

³¹ The reference to relevant legal requirements refers to Strategic Environmental Assessment.

³² PPG Paragraph: 018 Reference ID: 11-018-20140306 Revision date: 06 03 2014

the findings of the assessment and the overall sustainability conclusions presented in the SA³³. In particular, Land at Cross Road (ALB014) has scored overall 'Good' in terms of sustainability, scoring well against the accessibility criteria (criteria 5) in comparison to other sites in Albrighton, including the proposed allocations (ALB017 and ALB021). Despite this, the sites selected for allocation (ALB017 and ALB021) have only scored 'Fair' and worse 'Poor' respectively in overall sustainability terms. It is noted that the Council has defined a number of mitigations to improve the sustainability of site ALB021.

6.1.13 In contrast, the Site (ALB014) is not covered by any statutory designations for landscape character or quality. The Site lies wholly within the Green Belt. The Albrighton Conservation Area lies to the north east of the Site, approximately 260m away at its closest point, continuing east to include Albrighton Hall. The Boningale Conservation Area lies due south of the Site but is not in close proximity to the Site, being located approximately 820m away at its closest point. A number of Listed Buildings lie within the wider vicinity of the Site.

6.1.14 Based on this, RPS contend that the Council has not given sufficient regard to the findings of the Reg 19 SA in considering the appropriateness of the preferred approach in light of reasonable alternatives, contrary to NPPF and PPG advice. As a consequence, the site selection process has not been sufficiently 'iterative' as required by the PPG, given that no changes or amendments have been made to the preferred approach to reflect the findings of the assessment process. This is evident based on consideration of the specific scoring for the proposed allocations and the Site (ALB014) undertaken at Stage 2a of the process.

Stage 2a: SA site assessment scoring – Land at Cross Road (ALB014)

6.1.15 This part of the representations relate to the sustainability appraisal of the Albrighton sites.

6.1.16 In relation to the site assessment process RPS broadly agrees with the assessment in the Reg 19 SA underpinning the overall score of 'Good' in relation to the Land at Cross Road (ALB014). However, RPS would like to point out a potential error in the certain aspects of the scoring against specific criteria. This relates to the score under criteria 5 (*Site boundary within 480m of one or more of a range of local facilities*), which scores the Site 'minus' against proximity to a Primary school. This is clearly wrong given that the Site is immediately opposite to Albrighton Primary School located to the immediate east of the Site and can be accessed by simply crossing Newhouse Lane. It must be noted that the SLAA 2018 report³⁴ makes specific reference to the school as part of the assessment of ALB014 but appears to have been ignored in the subsequent appraisal of the Site, and furthermore has not been adjusted in the latest update.

6.1.17 Consequently, RPS contend that the score should be amended from 'minus' to 'strongly positive' given that it is the closest site to any existing school in Albrighton, thus representing a swing of three points in favour of the Site. This would result in an amended score from '-2' to '+1', meaning

³³ The overall scoring and sustainability conclusions for each site in Albrighton is set out in the *Regulation 19 Pre-Submission Draft Shropshire Local Plan 2016 to 2038 Sustainability Appraisal and Site Assessment Environmental Report December 2020, Appendix B (Stage 2a), pages 10-13* (unchanged from previous iterations)

³⁴ Shropshire SLAA (2018) Appendix A - Assessment summary in and around Strategic, Principal and Key Centres, p3

the Site would score the highest of any site in Albrighton in terms of its sustainability credentials (by increasing the overall score from '-1' to '2').

Further to this, the conceptual layout within the Development Vision document (Appendix 1, Figure 17 refers) incorporates a proposed new footpath link running along the eastern boundary of the Site that will connect directly into Newhouse Lane, thus strengthening the connectivity and accessibility of the Site to its surroundings.

6.1.18 Consequently, RPS would suggest that Land at Cross Road is one the most sustainable of all the sites assessed by the Council, providing clear justification to support the allocation of the Site in the Plan (ALB014) given there is no logical reason that prevents its inclusion on sustainability grounds.

6.1.19

Stage 2a: SA site assessment scoring – Sites ALB017 and ALB021

This part of the representations relate to the sustainability appraisal of the Albrighton sites.

6.1.20 By contrast to site ALB014, sites ALB017 and ALB021 were scored as 'fair' (-6) and 'poor' (-10)
6.1.21 based on the Council's own findings. Also worthy of note is that out of the 29 sites that were assessed at this stage, only three scored worse than ALB021. Even when both sites were assessed together, the score produced was still 'fair' (-6). Conversely, once the score for site ALB014 is properly representative of its sustainability credentials, it is in the top four sites out of 29 assessed.

6.1.22 Consequently, on this basis alone, RPS find it difficult to understand how sites ALB017 and ALB021 (either taken separately or in combination) are capable of being considered more appropriate than site ALB014 based on the evidence set out in the Reg 19 SA. Clearly, the Council has gone against its own assessment without setting out any reasons to justify why these sites should be allocated in preference to other, higher scoring sites, such as ALB014. RPS had raised this matter at the Preferred Sites consultation stage, however there is no clarity or explanation provided in the SLP to substantiate the Council's approach on site allocations at Albrighton. This represents a clearly failing by the Council and raises serious soundness concerns regarding the site assessment and selection process undertaken in support of the SLP.

6.1.23

Stage 2b: Screening of Sites assessment

6.1.24

This part of the representations relate to the selection of sites at Albrighton as identified in Policy S1.

6.1.25 This stage consisted of a screening exercise informed by consideration of a site's availability; size and whether there were obvious physical, heritage or environmental constraints present, based on the strategic assessment undertaken within the SLAA. The findings for Albrighton are set out in Appendix B of the Reg 19 SA³⁵.

This stage in the site assessment process also considered the 'strategic suitability' of each site. RPS notes and broadly accepts the assessment and conclusions regarding site ALB014 (page 23 refers), which recommends the Site proceeds to Stage 3 in the process. Nonetheless, the 'residential suitability conclusion' for site ALB014 following the Stage 3 assessment finds the Site

³⁵ Page 14 to 43 contains information relating to the Albrighton sites assessed at this stage

to be 'not suitable' based on the findings of the earlier stage 1 assessment in the SLAA³⁶. This only refers to specific factors i.e the Site being outside the [existing] settlement boundary and in Green Belt, TPOs on site and relative proximity to nearby heritage assets. However, the SLAA (2018) also concluded that the site-specific factors could be resolved and thus found the Site could be made 'suitable'. RPS therefore maintain that there are no specific designations or site-specific constraints that prevent the development of the Site once more strategic matters i.e Green Belt boundaries are resolved, and therefore disagree that the Site is 'not suitable' for development.

6.1.26 Conversely, there are gaps in the conclusions as they relate to Site ALB017 and ALB021 set out in Appendix B (page 26 and 30 refer respectively). Furthermore, it is worthy of note that both these sites are scored as 'not currently suitable' (emphasis added) at Stage 2a, based on the stage 1 SLAA, but both have now proceeded to be allocated in the SLP. Therefore, the word 'currently' has been used interchangeably on some sites and not others (inc. ALB014) despite the SLAA finding that ALB014 could be made suitable through the various mitigation measures identified at stage 1. This raises further concerns as to the consistency and thus transparency applied in the site assessment process for Albrighton.

Stage 3: Detailed Site Review

6.1.27 This part of the representations relate to the selection of sites at Albrighton as identified in Policy S1.

6.1.28 The Council claims that stage 3 consists of a 'proportional and comprehensive assessment' of sites informed by the Sustainability Appraisal and assessments undertaken by Highways; Heritage; Ecology; Trees; and Public Protection Officers; various technical studies, including a Landscape and Visual Sensitivity Study, Strategic Flood Risk Assessment and Green Belt Assessment/Review where appropriate; consideration of infrastructure requirements and opportunities; consideration of other strategic considerations; and professional judgement. The Council also claim that this stage of assessment was an iterative process.

6.1.29

Site ALB014 – Land at Cross Road

6.1.30 It is at this stage that the Site (ALB014) has been discounted from being a potential allocation in the SLP, but proposes the Site for 'safeguarding' for future development beyond the current plan period. The main reason stated in the Reg 19 SA (page 61 refers) for this is the Council's claim that, "...the site is located within a sub-parcel which has been identified as having a moderate level of harm on the Green Belt, as such it is considered an appropriate location to remove from the Green Belt and safeguard for future development beyond the current plan period...".

Whilst agreeing with the Council that the Site should be removed from the Green Belt at Albrighton, RPS disagrees with this particular conclusion. Accordingly, based on evidence submitted by RPS to the Preferred Site consultation, and represented at Appendix 3 of this submission, RPS maintains its position that the Site no longer meets the purposes of the Green Belt and it's release would cause limited harm to the wider Green Belt if it were built upon. Furthermore, it is noted that the stage 3 findings do not identify any site-specific or other policy

³⁶ Shropshire SLAA (2018) Appendix A, page 3

reasons to reject the Site as being unsuitable as all relevant development-related matters can be resolved at the planning application stage, which RPS concurs with.

Sites ALB017 and ALB021 (proposed site allocations)

The Council's reasons for preferring both these sites is set out below.

For Site ALB017, the reason given is, "... *The site is well related to the settlement within an area of safeguarded land identified to meet Albrighton's future development requirements and is a natural direction for expansion.*"

6.1.31 For site ALB021, "...*the site is well related to the settlement within an area of safeguarded land*
6.1.32 *identified to meet Albrighton's future development requirements and is a natural direction for*
expansion. Whilst the site performs poorly within Stage 2a Sustainability Appraisal of the Site
6.1.33 *Assessment process, this is primarily due to access to services and facilities. Enhancing access*
from the site to the services and facilities available within the town can be achieved through
development of the site (in combination with ALB017). Furthermore additional green
infrastructure provision can be achieved through development of the site (in combination with
ALB017)."

6.1.34 In respect of the reasoning given, RPS suggests that the Site (ALB014) is equally 'well related'
to the settlement as the preferred sites and would also represent a 'natural direction for growth'
if it was supported, and no justification or analysis is presented by the Council to deny this.
Furthermore, the reasoning clearly has an element of bias attached in that the Council has
chosen a site that, without mitigation, would continue to perform poorly in SA terms with regards
of accessibility were it to be developed compared to other more appropriate site options. In this
context, it is clear that site ALB014 is more accessible than site ALB021 and could deliver as
much, if not greater, improved provision of green infrastructure than ALB021 (as supported by
6.1.35 Vision Document prepared and submitted on behalf of TW).

6.1.36 In summary, RPS acknowledges the Council's recommendation that it is appropriate for site
ALB014 to be released from the Green Belt. Therefore, this assigns the Site the same planning
status as the two sites selected for allocations identified in the SLP (ALB017 and ALB021) as
these were similarly identified as 'safeguarded land' in the SAMDev DPD. However, based on
the Council's own evidence that has informed the SLP review process, it is clear that ALB014
performs better than the two selected sites in sustainability terms, yet has not been allocated in
the SLP. RPS questions the logic in selecting these two sites ahead of Site ALB014.

On this basis, RPS contends that there is no evidential basis to exclude site ALB014 from
allocation in the SLP in preference to the two preferred sites. Consequently, the Council's
approach is not justified and so is not soundly-based. Similarly, RPS contends that the preference
for sites ALB017 and ALB021 has not been adequately justified based on the SA process (Stage
2a), site screening (stage 2b) and subsequent detailed review (Stage 3), and therefore their
selection for allocation is not soundly-based.

7 GREEN BELT EXCEPTIONAL CIRCUMSTANCES

This chapter of the representations are made in response to Policy SP11, with a focus on Exceptional Circumstances.

Need for Green Belt Review

7.1.1 It has long been accepted that the Shropshire Green Belt is need of reviewing. Since its designation in 1975 it has remained largely untouched but is now viewed by many as constrains the growth potential of settlements in east Shropshire, from the eastern edge of Bridgnorth to the eastern boundary of the County, including Albrighton, a matter that has been acknowledged by Shropshire Council³⁷. RPS further notes that the Green Belt within Shropshire was last reviewed during the preparation of the Bridgnorth Local Plan 1996-2011 and that safeguarded land identified to make provision for longer term development needs has now been largely used or allocated (including those sites at Albrighton)³⁸.

7.1.3 During the preparation of the Sites Allocations and DM policies DPD (SAMDev) for Shropshire, the Inspectors Report on the examination highlights that concern was raised that SAMDev would not provide enough housing to meet an up-to-date assessment of objectively assessed housing need. In the Report on the Examination into SAMDev, the Inspector stated that any review of objectively assessed needs would be a matter for the review of the Local Plan, which Shropshire Council committed to commence in 2015. The Inspector then directed (through the Main Modifications) that a review of Green Belt boundaries in Shropshire should be undertaken as part of the review of the potential strategic options to deliver new development through the Local Plan³⁹. Paragraph 3.28 of SAMDev states:

7.1.4 *" A detailed review of the Green Belt boundary will be undertaken in the Local Plan review, as part of looking at sustainable growth options. The review of the Green Belt will use a methodology that is consistent with neighbouring authorities."*

7.1.5 The broad context was therefore set for a complete assessment and review of Shropshire's Green Belt. RPS sets out representations on the Council's approach to reviewing the Green Belt (GBR) in Chapter 8 of this submission (with supporting evidence attached as Appendix 2 and 3 to this submission), , which conclude that the impact of releasing Land at Cross Road, Albrighton would most likely result in 'low to moderate' harm to the purposes of Green Belt at the settlement. Nevertheless, the Council has issued an Exceptional Circumstances Statement 2020 (ECS) in support of the Council's decision to propose further release of land from the Green Belt. RPS sets out its responses on this document below.

Strategic Exceptional Circumstances

In determining whether exceptional circumstances exist or not for releasing land from the green belt, it is important to acknowledge two recent legal High Court judgments which sets out the

³⁷ Shropshire Local Plan Review, Preferred Scale and Distribution of Development (2017), Page 23, Paragraph 5.1.

³⁸ Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, paragraph 3.96

³⁹ Report on the Examination into the SAMDev Plan, Page 8, Paragraphs 20 to 23

process local authority authorities should take in releasing land from the Green Belt. The two judgments are:

- IM properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin) Patterson J and:
- Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gelding Borough Council [2015] EWHC 1078 (Admin), Jay J.

These judgments clarify that if Green Belt is to be released, it should happen as part of a two-stage process. It is first necessary for the 'strategic' level exceptional circumstances for Green Belt release to be justified; and secondly, it is necessary for the site-specific exceptional circumstances to be justified also.

7.1.6

In this regard, the Council considers that exceptional circumstances do exist to justify the release of land from the Green Belt, and sets out its policy approach for doing so under Policy SP11 of the SLP. Here, the identifies those parcels of land to be excluded from the green belt (including Land at Cross Road, Albrighton). In support of this, the Council has prepared the '*Green Belt Release Exceptional Circumstances Statement*' ECS), updated December 2020, in respect of the approach proposed.

7.1.7

The ECS states, at paragraph 5.52:

7.1.8

"It is considered that without providing further safeguarded land associated with the settlement of Albrighton, there will be very limited future development opportunities. As such it is considered that this represents an exceptional circumstance to justify releasing the land from the Green Belt."

7.1.9

And goes on to state, at paragraph 5.56:

7.1.10

"In order to ensure that the longer-term needs of the communities living in Albrighton and its surrounding rural hinterland can be achieved, it is considered necessary to identify safeguarded land for development beyond the Local Plan Review period. As such it is considered that this represents an exceptional circumstance to justify releasing the land from the Green Belt."

7.1.11

In response, RPS agrees that 'strategic' exceptional circumstances do exist to justify release of land from the Green Belt in Shropshire. In particular, RPS is broadly supportive of the Council's approach to the release of Green Belt as it relates to Albrighton. At the strategic level, it is clearly the case that the needs of Albrighton (and thus the development strategy as a whole) cannot be achieved simply by redeveloping and intensifying brownfield sites within the existing built-up area of the settlement. It is also plainly obvious (based on completions data since 2006) that delivery of housing in Albrighton has been anaemic primarily as a result of the policy constraint provided by the Green Belt boundary around the settlement. On this last point, the Council accepts that past [under]delivery is likely to exacerbated local needs at Albrighton⁴⁰.

Therefore, whilst there is broad support for the release of Green Belt land at Albrighton (as a matter of principle), in line with representations made elsewhere in this submission RPS contend that the SLP should go further and specifically allocate additional land at Albrighton. The only way

⁴⁰ Shropshire Green Belt Release: Exceptional Circumstances Statement, December 2020, paragraph 5.15

to achieve this is to release more land from the Green Belt. In this context, Land at Cross Road (ALB014) offers the most appropriate opportunity to deliver the additional growth at Albrighton on a sustainable site that would not undermine the purposes of the Green Belt in this location if it were developed. This would help to address specific concerns raised in this submission regarding the lack of recognition of the role Albrighton could play in contributing towards the identified housing shortfall emanating from the Black Country given its location within one of Shropshire's key 'strategic corridors'. As demonstrated above, this shortfall has increased following the recent announcements on revisions to the local housing need methodology which now focuses growth to a greater degree on the top 20 urban areas in the north and midlands (in particular Wolverhampton, and Birmingham), making such a contribution more pressing and immediate.

7.1.12 On this basis, RPS considers the increasingly pressing need to address the identified housing shortfall from the Black Country constitutes 'strategic exceptional circumstances' in addition to those circumstances identified in the ECS, which also provides clear justification for increasing the amount of land to be released from the Green Belt at Albrighton for development in this plan period (up to 2038). Consequently, RPS contends that the Council's approach to defining strategic exceptional circumstances ignores this factor and thus the SLP is not soundly-based (not justified).

Site-Specific Exceptional Circumstances

7.1.13 The ECS makes reference to the 'strategic level' exceptional circumstances that, in our opinion, demonstrate that exceptional circumstances exist to support the release of green land at Albrighton. However, the only land to be released from the green belt and promoted for development are the saved existing commitments (including the current SAMDev allocations) and the two new allocations (ALB017 and ALB021) discussed in the previous chapter. Consequently, the ECS states that, "...As such it is not proposed that any land is removed from the Green Belt for allocation at Albrighton within the Local Plan Review..." (paragraph 5.17 refers, emphasis added).

7.1.14

Conversely however, the ECS then states, at paragraph 5,19, that:

7.1.15 *"5.19... Land at Cross Road, Albrighton (ALB014)...is considered to be suitable for safeguarding for future development beyond the Local Plan Review period, subject to demonstrating exceptional circumstances for removing the land from the Green Belt. It is also understood to be available for development."*

And goes on to state, at paragraph 5.61 and 5.62, that:

7.1.16 *" 5.61. Furthermore, whilst the wider Green Belt parcels containing sites (ALB014...) perform strongly against Purpose 4, the Green Belt Review concluded that sub-parcels containing these sites performed differently, stating "Releasing this parcel from the Green Belt would be unlikely to cause significant encroachment on the countryside, or significantly weaken the role neighbouring areas of Green Belt are playing with regard to Purpose 3 or Purpose 4..."*

5.62. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified..."

Therefore, it is the view of RPS that 'site-specific', as well as 'strategic', exceptional circumstances exist **now** to demonstrate that the release of Land at Cross Road (ALB014) is

justified. This is because it is clear from the Council's own evidence that the release of sub-parcel P36 would not undermine the purposes of Green Belt to the same degree as development across the wider P36 parcel. Additional evidence prepared by CSA Environmental on behalf of TW shows that the likely impact on green belt by developing the site would be 'low-moderate', rather than 'moderate' harm as is claimed by the Council (see section 8.1.50-8.1.59 of this submission for a summary of the findings).

7.1.17 Furthermore, the illustrative masterplan (see figure 1 of this submission) submitted at the Preferred Sites consultation stage (see Vision Document attached at Appendix 1 of this submission for full details) demonstrates that compensatory measures are capable of being delivered in accordance with the Framework, principally through laying out of open space on adjacent land to the immediate south of Land at Cross Road site that would be available and accessible to the residents, as well as wider community in Albrighton.

7.1.18 Therefore, the factors above, demonstrate that site-specific exceptional circumstances exist to justify the release of Land at Cross Road (ALB014) from the Green Belt for allocation in the SLPR, and not simply identified as 'safeguarded land'. On this basis, RPS contends that preventing the release of land from the Green Belt for allocation as part of the SLP review in this plan period (as acknowledged in the ECS at paragraph 5.17) is not soundly-based (not justified).

7.1.19 The next chapter sets out representations on the Council's Green Belt review. In relation to Land at Cross Road, it is argued that, in Green Belt terms, the release of the Site is appropriate and justified now.

8 GREEN BELT REVIEW

This chapter of the representations are made with respect to the Green Belt Review undertaken in support of the local plan review, and so relate to Policy SP11.

8.1.1 The Pre-submission Draft of the Shropshire Local Plan maintains the proposal to remove Land at Cross Road, Albrighton from the Green Belt and allocate it as 'safeguarded land' for future development. As part of the supporting evidence for the dSLP, Shropshire Council published a Green Belt Assessment and Review (Stages 1 and 2) in September 2017 and November 2018 that supports the removal of the site from the Green Belt.

8.1.2 RPS broadly supports the removal of the Site from the Green Belt, however we do not support the identification of the Site as 'safeguarded land' in the dSLP.

8.1.3 This part of the representations therefore incorporate the findings of the CSA Environmental Landscape Appraisal and Green Belt Assessment (produced on behalf of Taylor Wimpey at **Appendix 2**) which supports the proposed changes to the Green Belt boundary in Albrighton. Additionally, at **Appendix 3** a Technical Green Belt Report has been produced by RPS which addresses the application of national Green Belt policy and the specific needs of Albrighton. Both reports conclude that the removal of this site from the Green Belt would result in limited harm to the Green Belt and that it would be consistent with national policy and is fully justified.

Site location and Green Belt context

8.1.5 The Site is located to the south western side of the village of Albrighton, in the north east of the Shropshire Green Belt identified on the draft Proposals Map as site P36/ALB014. The Site is bound to the north by Cross Road and the built-up settlement edge of Albrighton, generally comprising residential development along the northern edge of Cross Road, together with the Albrighton Sports and Social Club. An area of incidental open space including a pond lies immediate adjacent to the north western boundary of the Site. The built-up area continues to the north and north east and generally consists of residential development. Albrighton High Street, including a mixture of retail, commercial and residential development is located approximately 0.35km to the north east at its closest point. Albrighton railway station lies approximately 1km north east of the Site. RAF Cosford lies approximately 1.5km north west of the Site.

8.1.6 To the east, the Site is bound by Newhouse Lane, together with three residential properties and an associated paddock which indent the eastern Site boundary. Albrighton Primary School is situated to the east of Newhouse Lane and comprises single and two storey buildings together with large areas of hardstanding for outdoor play and a school playing field. Land to the east of the school is predominantly agricultural, although several large properties and Albrighton Hall are located along Kingswood Road, beyond the eastern settlement edge.

8.1.8 The Site is bound to the south well established and mature mixed species hedgerow and beyond that by agricultural fields which continue towards Holyhead Road (A464), approximately 0.75km south of the Site. Patshull Road and Newhouse Lane both extend southwards to join Holyhead Road, with several scattered properties along both roads. A cluster of buildings at the junction of Patshull Road and Holyhead Road includes Lea Hall and Lea Farm.

To the west, the Site is bound by a single residential property and associated garden which separates the Site from Patshull Road. To the west of Patshull Road lies predominantly

agricultural land, which is bisected by Cross Road as it leads south west towards Holyhead Road. Several detached properties are located along the northern edge of Cross Road beyond the western settlement edge, as well as a cluster of large industrial warehouses at Enterprise Business Park.

Landscape Character

National Landscape Character

As part of the background work produced in support of the promotion of the Site for future residential development CSA Environmental prepared a Landscape Appraisal and Green Belt Assessment in January 2019 (**Appendix 2**).

8.1.9 That Appraisal defines the Landscape Character of the site and its context and concludes that, with regard to the Natural England 'National Character Area' profiles (NCA) the Site lies on the boundary between the Shropshire, Cheshire and Staffordshire Plain National Character Area (NCA 61) to the north and the Mid Severn Sandstone Plateau Character Area (NCA 66) to the south.

8.1.10

8.1.11 The Shropshire, Cheshire and Staffordshire Plain NCA is described as an extensive, gently undulating plain dominated by dairy farming, with patches of arable and mixed farming in the north and south east. Field patterns are generally strong, with well-maintained hedgerow and dense hedgerow tree lined field boundaries. Woodland cover is sparse and generally confined to the area around Northwich and within estates. The Mid Severn Sandstone Plateau NCA is described as comprising an undulating landscape with tree-lined ridges on the plateau in the core and east of the NCA, while the west comprised irregular topography and steep wooded gorges of the Severn Valley.

8.1.12 CSA Environmental conclude that the Site and its surroundings are more typical of the Shropshire, Cheshire and Staffordshire NCA, with the landscape generally comprising well vegetated field boundaries with a mixture of arable and pastoral fields and generally sparse woodland cover.

8.1.13

District Landscape Character

8.1.14 The Shropshire Landscape Typology was produced by Shropshire County Council, together with a number of organisations, in September 2006, with the overall aim of managing landscape change in a sustainable way.

The assessment identifies 27 different Landscape Types (LTs), with the Site lying within the Sandstone Estatelands LT. Key characteristics of the Sandstone Estatelands LT include:

- Arable land use;
- Regular field patterns;
- Parkland with associated country houses;
- Clustered settlement pattern; and
- Medium – large scale, open landscapes.

CSA Environmental conclude that whilst the Site exhibits some characteristics of the Sandstone Estatelands LT, it is currently in pastoral use and has a more enclosed character owing to its established field boundaries, with few opportunities to view the Site from its wider area.

Designates Sites and Heritage Assets

- 8.1.15 The Site is not covered by any statutory designations for landscape character or quality. The Site lies wholly within the Green Belt. The Albrighton Conservation Area lies to the north east of the Site, approximately 260m away at its closest point, continuing east to include Albrighton Hall. The Boningale Conservation Area lies due south of the Site, approximately 820m from the Site at its closest point. A number of Listed Buildings lie within the wider vicinity of the Site.
- 8.1.16

Site description and visibility

- 8.1.17 The Site occupies an area of land comprising three roughly rectangular shaped, pastoral fields. The first field comprises a broadly square shaped pastoral field which is currently used to keep cattle. It is bound to the north by a mixed species hedgerow with occasional hedgerow trees and a tree group which separates it from Cross Road. To the west, the field is enclosed by the boundary fence to No.1 Patshull Road and a single specimen tree. A mixed species hedgerow defines the southern boundary to this field, with two hedgerow trees located within the western section of hedgerow. The eastern boundary to the field is defined by a mixed species hedgerow with occasional small hedgerow trees. A field gate on the eastern boundary of the field provides access into the adjacent field.
- 8.1.18 The second field comprises a broadly rectangular shaped pastoral field which is also used to keep cattle. A cluster of agricultural barns occupy the north eastern corner of the field at Garage Farm, with access off Newhouse Lane to the east. The field boundaries comprise mixed species hedgerows, with occasional hedgerow trees. A small area of trees and scrub vegetation lies in the north western corner of the field. A field gate on the northern boundary provides field access off Cross Road and a field gate on the eastern boundary provides field access off Newhouse Lane.
- 8.1.19 A field gate is also located on the southern boundary providing access to the adjacent field.
- 8.1.20 The third field comprises an irregular shaped field which is divided by post and rail fencing. The eastern part of the field is used to keep horses, with a small pitched roof barn located in the south east corner of the field. The westernmost part of the field is in pastoral use and a field gates provide access to the adjacent fields. The field boundaries generally comprise hedgerows with occasional hedgerow trees along the southern field boundary.

Topography

CSA Environmental confirmed that the Site is relatively flat, situated at approximately 92m Above Ordnance Datum (AOD) and that the land to the north, within the built up area of Albrighton, generally undulates between 85m and 100m AOD. Land to the south, east and west of the Site generally undulates between similar levels, although the land in the vicinity of Kingswood, approximately 3km to the south east of the Site, rises up to approximately 150m AOD.

Landscape Quality, Sensitivity and Value

8.1.21 As stated above the Site comprises three medium sized pastoral fields, with field boundaries defined by hedgerows with occasional hedgerow trees. CSA Environmental confirmed that the hedgerow trees are typically of Category B quality and are of medium landscape quality. A single oak tree on the southern boundary of Area A is considered to be of Category A quality and two trees on the eastern boundary are covered by a TPO. These trees are assessed as having high landscape quality and the pastoral fields as being of medium landscape quality.

8.1.22 CSA Environmental concluded that the overall landscape character of the Site is more enclosed than is typical of the Sandstone Estatelands LT, with well-defined field boundaries comprising hedgerows and hedgerow trees. The landscape quality of the Site is also influenced by its proximity to the settlement edge and due to the fact that it is overlooked from a number of properties. Overall the site is assessed by CSA Environmental as being of medium landscape quality.

8.1.23 In terms of its landscape value it is important to note that the Site is not covered by any statutory or non-statutory designations for landscape character. There is no public access across the Site, although it is likely to be valued as a local level for its openness by neighbouring residents. The site has been assessed by CSA Environmental as having an overall medium landscape value.

8.1.24 Given that the Site is of medium landscape quality and sensitivity it is not therefore considered to be a 'Valued Landscape' for the purpose of paragraph 170 of the NPPF.

Visibility

8.1.25 CSA Environmental undertook a detailed appraisal of the visibility of the site as part of the Landscape Appraisal and Green Belt Assessment (**Appendix 3**) that confirmed that the level of vegetation cover along the Site's field boundaries and within the surrounding fields limits opportunities to view the Site from its surroundings.

8.1.26 In summary the CSA Environmental Appraisal makes the following observations and conclusions regarding the visibility of the Site. The site is overlooked by a number of properties to the north and east as well as a single property to the west. Views from Patshull Road from the south look across the intervening fields, with the Site screened from view by field boundary vegetation.

8.1.27 Views from Holyhead Road (A464) to the South are limited to near distance views of the adjacent fields, with field boundary vegetation preventing views of the Site. Views from public footpaths to the south east of the Site look across the intervening fields, with the Site screened from view by intervening vegetation. Long distance views from the public footpath to the south east of the Site look across the intervening landscape, with intervening landform and vegetation screening the Site from view.

8.1.28 Views from Newhouse Lane to the immediate east of the Site are predominantly screened by the roadside hedgerow and trees. Views from properties on Newhouse Lane including Meere House and Meere Barn are partially filtered by vegetation within the gardens of properties. These views are from predominantly first floor windows with occasional ground floorviews possible. The Site is screened in views from the public footpath by intervening field boundary vegetation.

Views from Cross Road to the immediate north of the Site are generally well screened by the Site's northern boundary vegetation. The Site is screened from the west along Cross Road by

intervening vegetation. Views from the incidental open space on Cross Road to the north west are predominantly screened by intervening trees and hedgerow vegetation.

The Site's two northernmost fields are visible in first floor views from a number of properties on Cross Road, above the northern boundary with ground floor views of the Site from these properties prevented by the intervening vegetation.

8.1.30 Views from Patshull Road to the immediate west of the Site are prevented by the property and boundary fence of No.1 Patshull Road together with the boundary vegetation. Views of the western part of the Site are possible from No.1 Patshull Road, with field boundary vegetation screening the eastern parts of the Site.

8.1.31 Overall the Site is well contained from its surroundings by established vegetation along its boundaries. There are only limited opportunities for views of the Site beyond its immediate surroundings.

8.1.32

Shropshire Green Belt Review

8.1.33 The Council published a Green Belt Review, undertaken by LUC on behalf of the Council, as part of the evidence base to support the site allocations consultation. The Stage 1 Green Belt Assessment Report was published in September 2017 and the Stage 2 Green Belt Review Report was published in November 2018. These documents have not been updated and remain the Council's latest evidence on Green Belt policy in Shropshire.

8.1.34 As part of the ongoing work to support the promotion of the Site for residential development, Taylor Wimpey instructed CSA Environmental to undertake a landscape appraisal and Green Belt assessment of the Site in January 2019. CSA Environmental have also reviewed the LUC Stage 2 Report to ensure that the work supporting the promotion of the site is up to date.

8.1.35 Stage 1 Green Belt Assessment (September 2017)

8.1.36 The purpose of the Stage 1 assessment was to assess the extent to which the land within the Shropshire Green Belt performs against the five purposes of the Belt, as set out in the NPPF and listed above at Paragraph 2.1.4. The Stage 1 Study would then be used to support the Local Plan Review, in relation to the strategic delivery of new development.

8.1.37 The site is included within a wider area of land referred to as Land Parcel 36 that extends southwards to Holyhead Road (A464) and includes land to the east and west of the Site. The Stage 1 Study came to the following conclusions, in relation to the five national purposes of including land within the Green Belt:

8.1.38 Purpose 1 – To check the unrestricted sprawl of large built-up areas

The Stage 1 assessment concludes that Parcel 36 makes **no contribution** to this purpose as it does not lie adjacent to a large built up area.

Purpose 2 – To prevent neighbouring towns merging into one another

The Stage 1 review notes that the Parcel is located adjacent to the settlement of Albrighton and that it lies between the settlements of Telford and Wolverhampton. The Stage 1 Study concludes that due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between

settlements and that the loss of openness would not be perceived as reducing the gap between settlements. As such the Stage 1 Study concludes that the Parcel makes a **weak contribution** to this purpose.

Purpose 3 – To assist in the safeguarding of the countryside from encroachment

8.1.39 The Stage 1 Study states that there is built development within the parcel that includes scattered residential properties and farm buildings. The edge of Albrighton encroaches into the north of the Parcel, however the Parcel contains the characteristics of countryside, has limited urbanising development, and is relatively open. The Stage 1 Study concludes that the Parcel makes a **moderate contribution** to this purpose.

Purpose 4 – To preserve the setting and special character of historic towns.

8.1.40 The Stage 1 Study states that the Parcel is theoretically visible from the historic settlement areas located within Albrighton/ Donnington. In practice, a small portion of the north eastern corner of the parcel is located partially within the Albrighton Conservation Area, with the openness of the land within this parcel playing a major role in its setting. The Parcel is therefore considered to make a positive contribution to the historic significance of Albrighton and its special character and the assessment concludes that the Parcel makes a strong contribution in this regard. However, the Stage 1 Study also identifies that the land located along the settlement edge in the north-west of this parcel (that includes this Site) has no inter-visibility with the Albrighton Conservation Area or any other historic settlement areas assessed under Purpose 4, and that this section of the Parcel does not play a key role in the immediate setting of these historic settlements and performs a weaker role under Purpose 4. Overall, the rating for this parcel as a whole is **strong contribution**.

Purpose 5 – To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

8.1.41 The Stage 1 Study states that all Parcels make an equally significant contribution to this purpose.

8.1.42

Stage 2 Green Belt Review (November 2018)

8.1.43 The Stage 2 Green Belt Review draws on the findings of the Stage 1 assessment and the contribution that Parcels make to the five Green Belt purposes, but also considers the harm of removing parcels and Opportunity Areas from the Green Belt, considering the impact on the integrity of the remaining Green Belt land and the strength of the remaining Green Belt boundaries. As part of this assessment the Stage 2 Study looks in greater detail at 29 'Opportunity Areas' around existing settlements.

As with the Stage 1 assessment, the Site is contained within Parcel 36, one of six Parcels that have been assessed around the edge of Albrighton. The Stage 2 Study also identifies the site as a 'Sub-parcel' within the wider Parcel (see Figure 8.1 below). In relation to Parcel 36 the Stage 2 review makes the following conclusions:

Figure 8.1: Parcel 36

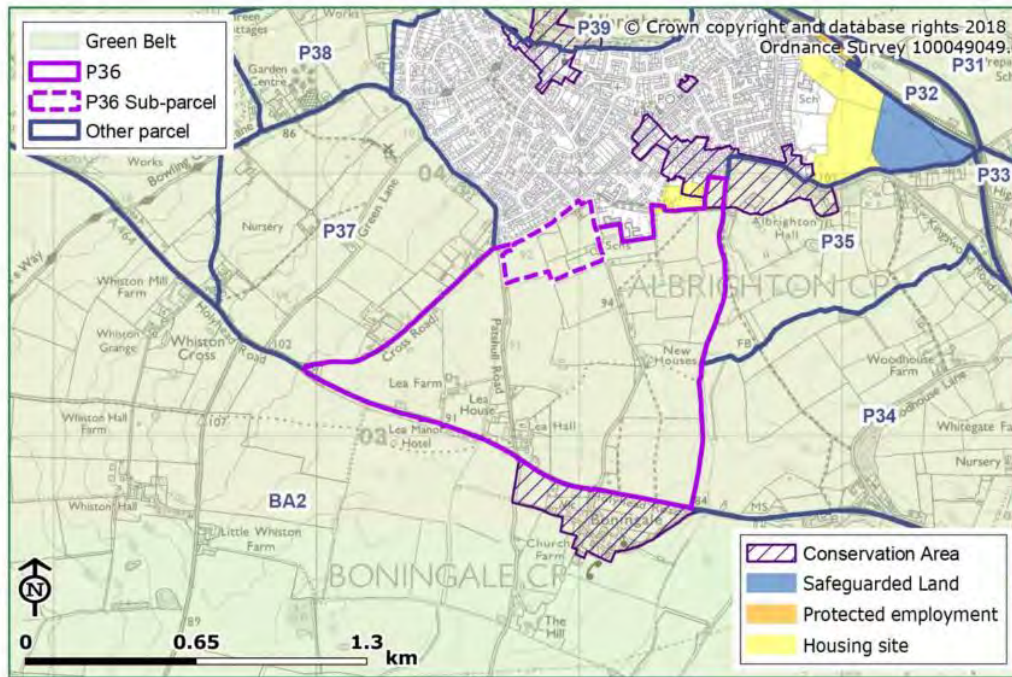


Figure A1.8: Parcel P36

8.1.44 Source: Shropshire Green Belt Review: Stage 2 (LUC, November 2018)

8.1.45 The conclusions of the Stage 2 Study in respect of the Site and specific Sub Parcel 36 are as follows:

Purpose 1 – To check the unrestricted sprawl of large built-up areas.

8.1.46 The Stage 2 Study comes to the same conclusion as the Stage 1 Study, that the Parcel makes **no contribution** to Purpose 1.

Purpose 2 – To prevent neighbouring towns merging into one another.

8.1.47 The Stage 2 Study comes to the same conclusion as the Stage 1 Study, that the Parcel makes a **weak contribution** to Purpose 2.

Purpose 3 – To assist in the safeguarding of the countryside from encroachment.

The Stage 2 Study comes to the same conclusion as the Stage 1 Study, that the Parcel makes a **moderate contribution** to Purpose 3.

Purpose 4 – To preserve the setting and special character of historic towns.

The Stage 2 Study comes to the same conclusion as the Stage 1 Study, that the Parcel makes a strong contribution to Purpose 4 but that the land located along the settlement edge to the north-west of the Parcel (essentially the Site) performs a **weaker role**.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

8.1.48

Both the Stage 2 review and the Stage 1 assessment come to the same conclusion in relation to this purpose, that at all Parcels make an equally significant contribution.

8.1.49

The Stage 2 review concludes that the release of the whole of Parcel 36 from the Green Belt would lead to a high level of harm to the Green Belt. As stated above, the Site is identified as a sub-parcel within Parcel 36. This sub-parcel is identified as comprising a series of small fields that are adjacent to the settlement edge and essentially follows the same boundary as most of the Site. The Stage 2 Study states that the sub-parcel is more closely associated with the settlement edge than the wider countryside to the south and that the release of this land would be unlikely to significantly weaken the role that other areas of land play in relation to Purpose 3. The Stage 2 Study also concludes that the sub-parcel does not play a significant role in contributing to the setting of the historic settlement. Overall, the Stage 2 Study concludes that the release of the sub-parcel from the Green Belt would lead to a **moderate** level of harm to the Green Belt.

8.1.50

CSA Environmental Green Belt Assessment

8.1.51

As indicated above a TW commissioned CSA to provide a separate GB assessment of the land parcel. This has been done utilising the methodology employed by the Council to ensure a consistency in approach. This is provided at **Appendix 2** and summarised below.

8.1.52

The Shropshire Green Belt Assessment found that parcel P36, within which the Site lies, plays a weak or no role in checking the unrestricted sprawl of large built up areas and preventing neighbouring towns from merging. It also found that the north western part of the parcel (the sub-parcel) plays a weaker role in preserving the special character of historic towns, with no indivisibility with the Conservation Area. The parcel is assessed as playing a moderate role in assisting in the safeguarding of countryside from encroachment, although it should be noted that the parcel represents a substantially larger area than the Site when considered in isolation.

8.1.53

The existing Green Belt boundary near the Albrighton Primary School follows the outer edges of the school buildings rather than the boundaries of the school grounds, which are well vegetated with mature trees to the eastern and southern boundaries. The Green Belt boundary near the school could be redefined to follow the vegetated boundaries of the school, which aligns with the Site's southern boundary. This would represent a clearly identifiable and defensible boundary in Green Belt terms and would be more robust than the existing boundary at the school.

8.1.54

The whole of the Site, together with land to its immediate west, immediate east and the southern area of the school grounds could be removed from the Green Belt, with the boundary redefined along the well vegetated southern edge of this parcel (as illustrated on the Proposed Green Belt Boundary Plan within Appendix E of the CSA Environmental Report (**Appendix 2**)).

CSA Environmental undertook an assessment of the Site together with the adjacent land against the first four purposes of the Green Belt, as set out in paragraph 134 of the NPPF (with the fifth purpose not assessed, as in the Shropshire Green Belt Assessment, on the basis that this purpose is considered to apply equally to all areas within the Green Belt). The following conclusions were reached:

8.1.55 **Purpose 1 - To check the unrestricted sprawl of large built-up areas**

The Site and land to the immediate east and west, is bound by Patshull Road in the west and well vegetated field boundaries to the south and east. These represent clearly identifiable and defensible boundaries in Green Belt terms and would regularise the existing boundary at the Albrighton Primary School. These defensible boundaries would contain any development within an established landscape framework and would not lead to unrestricted sprawl of Albrighton.

8.1.56

Purpose 2 - To prevent neighbouring towns merging into one another

In terms of neighbouring towns merging, the nearest settlement to the south of Albrighton is the hamlet of Boningale. The release of the Site and land to the immediate east and west would result in a relatively minor reduction in the gap between these settlements, retaining a gap of at least 0.9km at its closest point, and would not therefore lead to coalescence. The land between these settlements has well vegetated field boundaries, preventing any perceived coalescence.

8.1.57

Purpose 3 - To assist in safeguarding the countryside from encroachment

The Site and land to the immediate east and west, contains several existing buildings which influence the character of the land. The Site is also overlooked by neighbouring properties on Cross Road to the north and by the school to the east. These factors all influence the Site, giving it an urban fringe character, and resulting in it performing less well than the wider open countryside. Given this and the clearly identifiable boundaries which bound the land, its planned release from the Green Belt for development would not result in encroachment into the wider countryside.

8.1.58

8.1.59

Purpose 4 - To preserve the setting and special character of historic towns

The Site and land to its immediate east and west do not adjoin the Albrighton Conservation Area (which lies to the north east) and there is no inter-visibility between this land and the Conservation Area. As such, the release of this land from the Green Belt would not affect the setting or special character of any historic town.

8.1.60

Summary of CSA assessment

8.1.61

Against the identified 5-point scale of overall harm, CSA Environmental conclude that the overall impact of the removal of the Site from the Green Belt would be **Low-Moderate** rather than Moderate.

Green Belt Review Conclusions

The Site is located adjacent to the southern settlement edge of Albrighton, with several residential properties located to the north of the site and the Albrighton Primary School located to the east.

A single residential property is located to the immediate west of the Site along Patshull Road and it is bound by agricultural fields to the south.

The Site comprises existing farm buildings at Garage Farm and three pastoral fields, with field boundaries generally comprising established hedgerows and hedgerow trees. Two trees situated on the eastern Site boundary are covered by a TPO.

8.1.62 The Site is generally well screened from its surroundings by established vegetation. Several near distance views of the Site are possible from adjacent properties which overlook the Site, as well as glimpsed views into the Site from the adjacent roads.

8.1.63 The Site lies within the Green Belt and adjoins the existing settlement boundary to the immediate north and in part to the east. The Site, together with land to its immediate east and west could be removed from the Green Belt without compromising the purposes of the Green Belt as defined in the NPPF.

8.1.64 Key landscape principles would be considered within design proposals, including the retention of existing vegetation and incorporation of these into new green infrastructure corridors, the provision of public open space including a children’s play space, the sensitive design and orientation of built form adjacent to existing properties and the inclusion of a new footway, linking to the adjacent bridleway. By adopting these landscape principles, the Site can be developed without resulting in material harm to the surrounding landscape and visual character.

8.1.65 In summary, as can be seen from the assessments undertaken by CSA Environmental, on behalf of Taylor Wimpey, and by LUC on behalf of Shropshire Council there is a general level of agreement between the findings, which are supportive of the potential removal of the Site from the Green Belt.

8.1.66 However, on the identified five-point scale of overall harm, CSA Environmental conclude that the overall impact of the removal of the Site from the Green Belt would be **Low-Moderate** rather than Moderate.

9 SUMMARY AND CONCLUSIONS

Preferred growth in Shropshire (Policy SP2)

The Pre-Submission Draft Shropshire Local Plan now proposes a housing requirement of 30,800 dwellings over a slightly longer plan period (2016-2038). As stated in the SLP (paragraph 3.8, 3.10 and 3.11 refers) this figure represents an annual average growth rate of 1,400 dpa., a slightly lower annual growth rate than earlier iterations of the SLP⁴¹.

9.1.1 In light of the concerns set out above, RPS does not support the proposed housing requirement of 30,800 dwellings over the plan period. This is significantly lower than recent trends in housing delivery since the beginning of the plan period (1,876 dpa) and thus, contrary to the Council's position, this does not represent a 'high growth' strategy. In fact, to plan for the delivery of 1,400 dwellings per year would constitute a 'plan for decline' when considered against these recent delivery rates in Shropshire. Such changes are reflected in recent changes seen in the area's dwelling stock since 2014 (see Table 3.1). Consequently, whilst RPS is not advocating the use of an alternative approach to the standard method calculation in determining Shropshire's local housing need, RPS contends that greater consideration should be given to more recent development trends that supersede the base year of the 2014-based household projections (2014).

9.1.2

9.1.3 Furthermore, as specifically highlighted in this submission (at paragraphs 3.1.10-3.1.15) RPS maintains the view that the Council's approach to the proposed housing requirement is not sufficient in addressing the pressing need for affordable housing in Shropshire, a problem acknowledged by the Council in the SLP.

9.1.4 Finally, RPS contends that the proposed 'soft' commitment within the SLP to take 1,500 of the Black Country's identified housing shortfall falls considerably short of what a reasonable contribution would be based on recent trends in migration between the areas (see Table 3.5). Consequently, RPS suggests that a contribution of around 10% of the revised identified housing shortfall in that area (3,419 dwellings) would be a more reasonable and justifiable contribution.

9.1.5

9.1.6 Based on this, the housing requirement should be increased above 30,800 dwellings (this submission suggests around 32,719 dwellings is reasonable and justifiable) and, as a consequence, the distribution to each of the Key Centres, including Albrighton, should also be increased.

9.1.7

Distribution of growth across Shropshire (Policy SP2)

RPS sets out a number of concerns with the Council's approach to distribution of growth in Chapter 3 of this submission (paragraphs 3.1.41-3.1.49).

In summary, the distribution strategy which seeks to focus only 16% of future housing growth on Key Centres but nearly a third (31%) of the areas housing growth on rural locations is inconsistent with an 'urban focused' spatial approach which seeks to direct 'significant' levels of growth

⁴¹ A growth figure of 28,750 dwellings over the period 2016-2036 (or 1,438 dpa) was previously proposed at the Preferred Sites consultation stage (2019).

towards the urban locations identified in Schedule SP2.1, including Albrighton. In terms of breakdown of the housing requirement, this would equate to 7,527 dwellings dispersed across the rural area, and only 5,150 homes at Key Centres (see Table 3.6 and 3.7 for summary of the data). The effect of this is more likely to limit, rather than maximise, the economic potential of Key Centres as intended under Policy SP2. RPS contends that the lack of focus on Key Centres, in proportionate terms, compared to other less sustainable has not been justified and does not represent positive planning, meaning that Policy SP2 is not soundly-based.

9.1.8 As a result, RPS consider that the approach is also illogical in terms of setting a strategy that seeks to direct development away from settlements accepted as being more sustainable than rural parts of the Borough. The result is that the guideline figures for Albrighton is constrained to fit with the proposed strategy distribution, rather than reflecting the opportunities that exist through the Plan to deliver additional growth in the most sustainable parts of the Borough.

Consistency between Housing and Economic Strategies (Policy SP2)

9.1.9 Furthermore, as set out above (paragraphs 3.1.50-3.1.56) there is a lack of consistency between the housing and economic strategies of the SLP, which further highlight the lack of consideration of the role Albrighton can play the strategic objectives of the SLP in an effectively manner.

9.1.10 On this basis, RPS contends that the housing and economic strands of the spatial strategy are not sufficiently integrated and therefore represents a lack of clarity in the SLP. Without sufficient clarity, the SLP is not 'clear and unambiguous' in relation to the status and purpose of Strategic Corridors with respect to housing development. Because of this, the SLP is contrary to national policy and is not therefore soundly-based.

Settlement strategy and development boundary – Albrighton (Policy S1)

9.1.11 As discussed in chapter 4 of this submission (paragraphs 4.1.4-4.1.16), the settlement policies of SLP build in the suppressed role of Albrighton established under Policy SP2. In particular, Table 4.1 of this submission illustrates the under-delivery of housing at Albrighton compared to other (non-Green Belt) settlements. This problem is a matter accepted by the Council in its own evidence⁴².

9.1.12 However, despite the evidence, the SLP (under Policy S1) does not propose any modification to the housing allocation at Albrighton and is persevering with the figure of 500 dwellings over the plan period. In response, RPS would suggest that growth at Albrighton should reflect not only local need but also recognise the opportunities that exist at the settlement to support greater levels of development consistent with the wider housing and economic agenda of the SLP., as well contributing towards the identified housing shortfall emanating from outside the area, as discussed in this submission

9.1.13 For these reasons, and consistent with representation made on Policy SP2 (and SP12 and SP14) above, RPS contends that the strategy for Albrighton SLP is not justified and has not been positively prepared, and therefore not soundly-based .

⁴² Shropshire Green Belt Exceptional Circumstances Statement, December 2020, paragraph 5.15

9.1.14 In addition, RPS does not agree with the development boundary as proposed (under Policy S1), on the basis that the boundary around this highly sustainable settlement remains too tightly drawn in an attempt to limit the alterations to the inner boundary of the Green Belt. By drawing the boundary so tight around Albrighton, it is less able to flex and adapt to rapid change, as required by paragraph 11a of the NPPF, for example in instances where known allocations do not proceed as anticipated. Consequently, it would be sensible to build more flexibility into the plan at the outset, through the identification of additional sites, rather than drawing a boundary that restricts the Council's options in dealing with unforeseen circumstances in the future.

9.1.15 RPS supports the recognition that the Site should be considered distinct from other areas of Green Belt that surrounds Albrighton. RPS also supports the recognition that development of the Site has potential and is acceptable in principle, given the Council's own position following its review of the Green Belt at Albrighton, and that the Site has potential for development in the future without undermining the purpose of the Green Belt as it relates to Albrighton.

9.1.16 However, as demonstrated elsewhere in this submission, greater consideration should be given to the allocation of additional sites at Albrighton, notably Land at Cross Road (ALB014) which is now proposed as safeguarded land until 2038. This would ensure that the Plan is sufficiently flexible in terms of the supply of sites and would ensure a range of sites are available to the local market. Consequently, the Council's approach to the settlement strategy and defining the settlement boundary at Albrighton is not justified and does not represent positive planning, thus it is not soundly-based.

Site selection and Sustainability Appraisal (Policy S1 and SA)

9.1.17 Chapter 6 sets out our concerns with the Council's approach to site assessment, selection and sustainability appraisal.

9.1.18 In summary, it is our contention that the Council's preference for sites ALB017 and ALB021 in the SLP as housing allocations has not been adequately justified based on the SA (Stage 2a), site screening (stage 2b) and subsequent detailed review (Stage 3), and that they have been proposed for allocation ahead of more appropriate alternatives, including Land at Cross Road (ALB014).

9.1.20 In particular, it is clear from Council's own evidence that the preferred sites score significantly worse than site ALB014 (and many other sites assessed) in sustainability terms and so should have been discounted at the screening stage (2b). It is our view that these sites have been preferred simply because they were safeguarded ahead of other sites in the SAMDev plan and so have been treated differently to the other SLAA sites. These raises concern as to the fairness and transparency in the site selection process, given the Council own stated aim of the SA process, which was to, "...help make sure that plan proposals are the most appropriate given the reasonable alternatives."⁴³

In this regard, RPS does not agree that the most appropriate alternatives, or indeed appropriate alternatives at all, have been selected in respect of site ALB017 and ALB017.

⁴³ Regulation 18 Pre-Submission Draft Shropshire Local Plan 2016 to 2038 Sustainability Appraisal and Site Assessment Environmental Report July 2020, paragraph 1.3

Consequently, RPS would suggest that Land at Cross Road is the most sustainable of all the sites assessed by the Council, providing clear justification to support the allocation of the Site in the Plan (ALB014) given there is no logical reason that prevents its inclusion on sustainability grounds.

9.1.21 Furthermore, RPS contends that there is no evidential basis preventing the allocation of Land at Cross Road (ALB014) for residential development in the Local Plan review. Consequently, the Council's approach is not justified and so is not soundly-based. Similarly, RPS contends that the preference for sites ALB017 and ALB021 has not been adequately justified based on the SA process (Stage 2a), site screening (stage 2b) and subsequent detailed review (Stage 3), and therefore their selection for allocation is also not soundly-based.

Land at Cross Road, Albrighton (Policy S1)

9.1.23 The Site controlled by Taylor Wimpey comprises 3.24ha of land at the south-western gateway to Albrighton and is located directly opposite Albrighton Primary School. As demonstrated in our submissions, the site is highly sustainable being accessible to a range of services and community facilities within the village, enjoying excellent accessibility to the strategic road (A41/M54) and rail network (Albrighton Railway Station links the village with Wolverhampton, Telford and Shrewsbury).

9.1.24 The Vision for the development is *"An attractive residential development offering a choice of high-quality new homes to meet local needs and being fully integrated with, and complementary to, the village of Albrighton"*.

9.1.25 A conceptual layout (see Chapter 1 and Appendix 1 of this submission) has been prepared which reflects the identified opportunities and constraints and which will deliver the above vision.

9.1.26 This will evolve following further consultation with Shropshire Council and the local community but indicates that the whole site can accommodate c.160 dwellings – c.80 on the land controlled by Taylor Wimpey – set amongst 1.7ha of open space including retained trees and hedgerows. Taylor Wimpey have noted that there is a community aspiration to deliver enhanced healthcare provision in the village, and the site has the potential to accommodate a community use. This can be explored further in consultation with Shropshire Council and the local community.

9.1.28 The development will deliver significant social, economic and environmental benefits and will be truly *"deliverable"* in relation to NPPF para. 47, being *"suitable"*, *"available"* and *"achievable"* (as set out in Sections 5 and 7 of the Development Vision document).

Green Belt Exceptional Circumstances (Policy SP11)

9.1.29 Chapter 7 and 8 set out RPS's representations on Green Belt matters in Shropshire. Based on evidence presented in support of this submission (and previous rounds of consultation), RPS considers that the Site, together with land to its immediate east and west could be removed from the Green Belt without compromising the purposes of the Green Belt as defined in the NPPF (see paragraphs 8.1.50-8.1.59 for a summary of analysis prepared by CSA Environmental Ltd, and Appendix 2).

Whilst there is broad agreement on the Council's statement on exceptional circumstances in that there are 'strategic level' exceptional circumstances to justify release of green belt at Albrighton, RPS considers the increasingly pressing need to address the identified housing shortfall from the

Black Country constitutes 'strategic exceptional circumstances' in addition to those circumstances identified in the ECS, which also provides clear justification for increasing the amount of land to be released from the Green Belt at Albrighton for development in this plan period (up to 2038). Consequently, RPS contends that the Council's approach to defining strategic exceptional circumstances ignores this factor and thus the SLP is not soundly-based (not justified).

9.1.30 Furthermore, whilst RPS agrees with the Council that there are 'site-specific' exceptional circumstances to justify that the Site (ALB014, Land at Cross Road) can be removed from the green belt, RPS disagrees with the decision to not propose the release of the Site, or any site, from the adopted Green Belt for specific allocation at Albrighton within the current Local Plan Review⁴⁴. This is because the Council's own evidence (in particular on SA) shows the Site as being able to deliver sustainable development that is well related to the existing settlement and local facilities, and also performs better than the proposed allocation sites in sustainability terms.

9.1.31 Therefore, RPS does not agree that the Site should be safeguarded in order to meet long-term (post-plan period) but should be allocated for residential development as part of the SLP review process. This is because we consider there to be clear strategic and site-specific exceptional circumstances to justify the release of the Site from the Green Belt **now** (as summarised in paragraph 7.1.12-7.1.14 of this submission) rather than wait until the next plan review cycle.

9.1.32 On this basis, RPS contends that Council's decision preventing the release of land from the Green Belt for allocation at Albrighton, with particular reference to Land at Cross Road, as part of the SLP review in this plan period is not justified and so not soundly-based.

Assigning sites to meet the identified housing shortfall of the wider sub-region (Policy SP2)

9.1.33 As stated in this submission, RPS is broadly supportive of the Council's intention to contribute to the identified housing shortfall emanating from the Black Country . However, as discussed, it is not clearly explained anywhere in the SLP how this contribution will be distributed across the Borough. Without such clarification, RPS contends that there is no means of monitoring progress towards honouring this commitment and thus no way of holding the Council to account if they fail to deliver on that commitment.

9.1.34 Such concerns go to the heart of questions over whether the Council has adequately demonstrated effective and on-going joint working on strategic matters, as required by national policy and under the Duty to Cooperate. This is brought into sharp focus due to the lack of any clear agreements or Statements of Common Ground signed up to between Shropshire and the Black Country to demonstrate effective cooperation has occurred throughout the SLP process, as required by national policy on such matters⁴⁵.

On this basis, RPS contend that the SLP is not positively-prepared and not consistent with national policy, and so is not soundly-based.

⁴⁴ As stated in the Green Belt Exceptional Circumstances Statement, December 2020 paragraph 5.17

⁴⁵ NPPF 2019 paragraphs 24 to 27

To assist the examination process, RPS would suggest that those sites that are 'assigned' to deliver on the contribution should be based on a sequential approach that favours those sites deemed sustainable and deliverable and that are also located in relatively close proximity and which are accessible to the Black Country conurbation by public transport. In this regard, sites located in the eastern part of Shropshire and situated along the A41/M54/A5 corridor are considered to be most appropriate when compared to other locations in the Borough.

9.1.36

Other Matters

The SLP proposes a number of borough-wide development management policies intended to guide future development. RPS has identified soundness concerns with a number of draft policies and these are set out chapter 5 of this submission.

9.1.37