



# ET Planning

## Sustainability Statement

Client:

Albrighton Village Action Group

**In respect of**  
**24/02108/OUT**

Application by Boningale Homes

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## **1. Introduction & Executive Summary**

- 1.1 This Sustainability Statement has been prepared by ET Planning on behalf of Albrighton Village Action Group ('AVAG'). The proposed development by Boningale Homes ('BH') in Albrighton presents significant challenges concerning its appropriateness and alignment with both current and emerging local policies. The evidence suggests that the proposed development, which includes 800 dwellings and a care home, vastly exceeds the sustainable growth limits identified in the existing and emerging Local Plans. Albrighton is recognized as a key centre within the Shropshire settlement hierarchy, but its capacity for additional growth must be carefully balanced against the constraints of its Green Belt location, the existing infrastructure, and the community's needs.
- 1.2 The currently proposed residential development guideline of 500 dwellings, which has already been accounted for through existing permissions, allocations, and windfall allowances, represents a carefully considered figure for sustainable growth for Albrighton. The proposed development's scale, representing a 176% increase over this guideline, would be a stark deviation from this strategy and would likely overwhelm the settlement's infrastructure, character, and community services. Furthermore, the potential population surge of over 40% in a single development phase would disrupt the balance that the Local Plan seeks to maintain across the district's settlements.
- 1.3 Additionally, the recent downgrades in Albrighton's public transport connectivity, specifically the reduced train services to Birmingham and Shrewsbury, undermine one of the critical factors that justified its classification as a key centre. This shift necessitates a reassessment of Albrighton's capacity for further growth, as its reduced connectivity could lead to increased reliance on car travel,

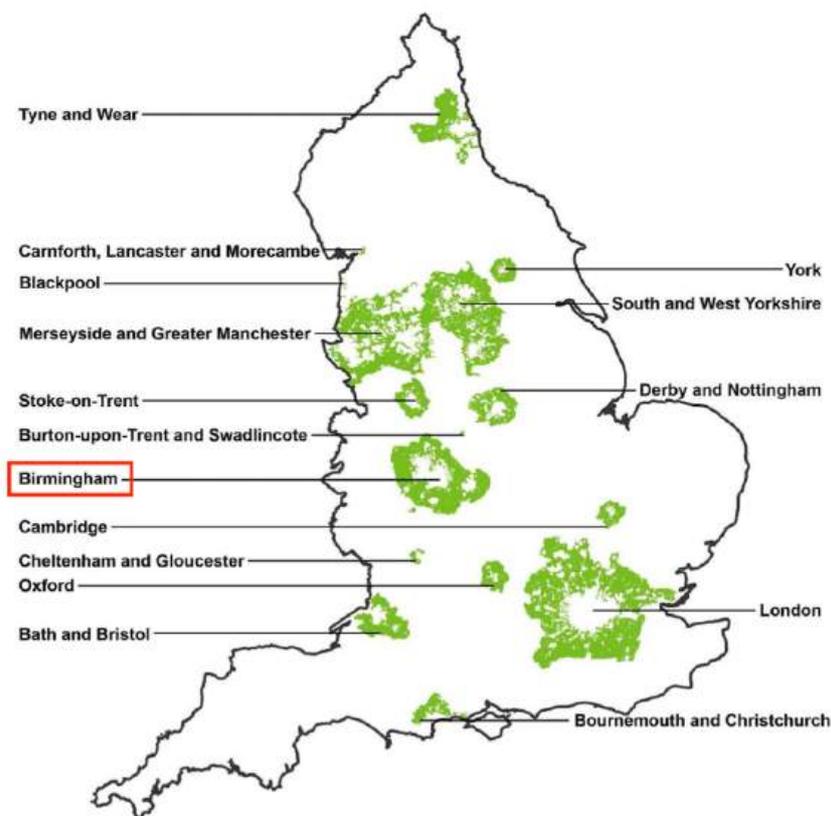
contradicting sustainability goals and exacerbating traffic and environmental impacts.

- 1.4 The proposal also raises concerns about the integrity of the Green Belt, which is intended to prevent urban sprawl and maintain the distinct character of settlements. The excessive scale of the proposed development within this protected area conflicts with both national and local policies that advocate for the Green Belt to be developed only as a last resort and only in cases where exceptional circumstances are demonstrated. The disproportionate size of the proposed Green Belt release for this development would set a concerning precedent, undermining the strategic planning objectives that guide the sustainable and equitable distribution of development across the district.
- 1.5 Moreover, the context of unmet housing needs from the Black Country, which the Shropshire Local Plan is partially designed to address, does not justify this development. The Local Plan's approach to accommodating these needs has been methodical and justified, focusing on strategic sites that are better suited in terms of location, infrastructure, and environmental impact. The argument that Albrighton, due to its proximity to the Black Country, should absorb a significant portion of this unmet need is not supported by the evidence, particularly given the site's poor connectivity and the rigorous site selection process undertaken by the Council, which prioritised non-Green Belt sites.
- 1.6 In conclusion, while Albrighton is recognised for its role within the Shropshire settlement hierarchy, the proposed development far exceeds the scale of growth that is sustainable and appropriate for the settlement. It disregards the carefully balanced policies aimed at maintaining the integrity of the Green Belt, ensuring sustainable development, and supporting the long-term vitality of Albrighton and

its surrounding areas. The proposed development, therefore, should not proceed as it is currently conceived. Instead, growth in Albrighton should continue to be guided by the principles of sustainable development as outlined in the Local Plan, ensuring that any future development is proportional, well-supported by infrastructure, and aligned with the community's needs and environmental protections

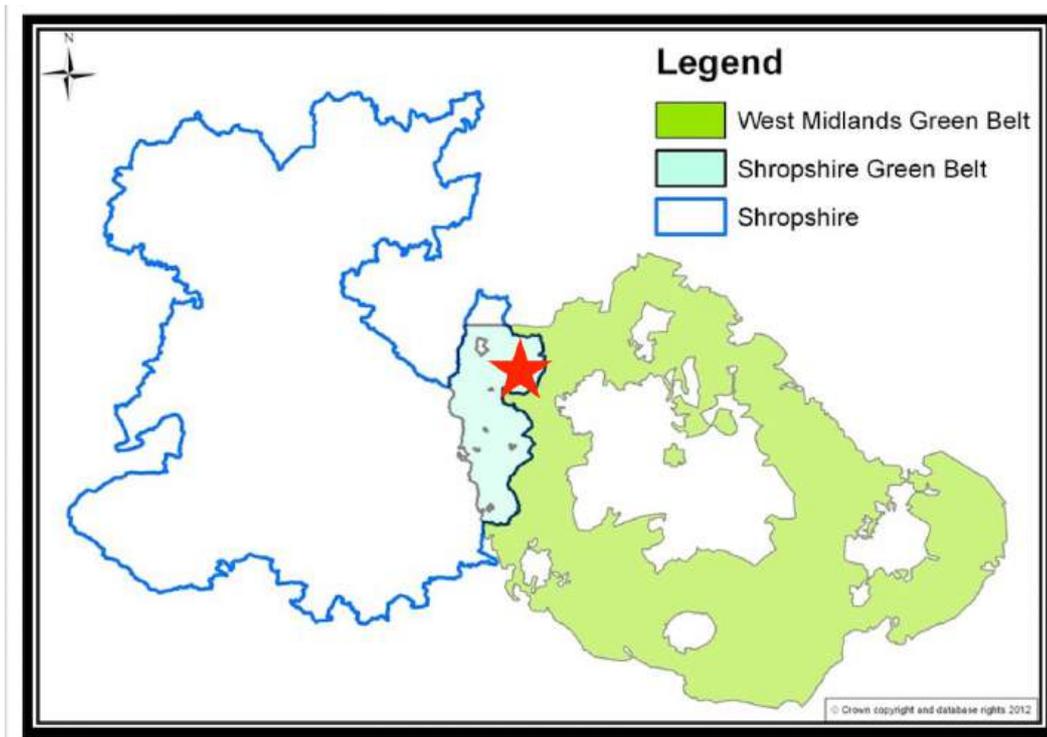
## 2. The Context of the District

- 2.1 The Development Plan for Shropshire District consists of the Core Strategy (2011), Site Allocations and Management of Development Plan (SAMDev Plan) and any made Neighbourhood Plans.
- 2.2 Shropshire Council is at a relatively advanced stage of a Local Plan Review. The draft Shropshire Local Plan was submitted for examination in September 2021 and Stage 1 Hearing Sessions which focused on legal and strategic issues (including strategic policies) were concluded in January 2024. The Planning Inspectors has subsequently issued their Interim Findings from the Stage 1 Hearing Sessions, which concluded that the Council has complied with the Duty to Cooperate.



**Fig 1: Location of England's Green Belts taken from the Green Belt Summit Paper, produced by No5 Chambers and LUC (August 2024)**

- 2.3 The Planning Inspectors have identified a few areas of the draft Shropshire Local Plan which they consider will require the Council to undertake further work. The Council have responded to this by undertaking additional SA and site assessment work to inform the identification of sites to accommodate the proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country.
- 2.4 The next stage is progression to Stage 2 hearing sessions (which will take place under the current NPPF under the proposed transitional arrangements), forecast for the late autumn, which will deal with site allocation and development management policy issues as well as examining settlement strategy.
- 2.5 A relatively small proportion of the District is Green Belt, as shown on **Fig 2**. The small proportion of Green Belt relates to the Birmingham Green Belt, as shown in its national context in **Fig 1**.



**Fig 2: Map supporting Policy SP11 (Emerging Local Plan Reg. 19, Figure SP11.1, page 49 – adapted by ET Planning to show the Site with red star)**

- 2.6 As is covered in the Planning Report by CERDA, on behalf of AVAG, developing Green Belt land should be a last resort (as enshrined in local and national policy).
- 2.7 The Site is not allocated in the SAMDev plan or in the emerging Local Plan so at present there is no policy support for the Proposed Development.

### 3. The Context of Green Belt Releases

3.1 As discussed in the preceding chapter, Shropshire Council is at a relatively advanced stage of its Local Plan Review. The draft Shropshire Local Plan was submitted for examination in September 2021 and Stage 1 Hearing Sessions were concluded in January 2024.

3.2 Shropshire have proposed Green Belt releases as part of their Local Plan Review, which can be broken down as:

- Strategic Sites – 214.2ha
- Housing – 1.4ha
- Mixed Use – 2.4ha
- Employment – 50.4ha
- Safeguarded land – 116.3ha

3.3 These proposed Green Belt releases are summarised in greater detail in **Fig 3**.

Table SP11.1: Green Belt Release by Location and Type						
Location	Housing (ha)	Mixed Use (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total (ha)
Albrighton	-	-	-	-	19.9	19.9
Alveley	1.4	2.4	-	-	3.6	7.4
RAF Cosford Strategic Site	-	-	-	214.2	-	214.2
Shifnal	-	-	39.0	-	92.8	131.8
Stanmore (Bridgnorth)	-	-	11.4	-	-	11.4
<b>Total</b>	<b>1.4</b>	<b>2.4</b>	<b>50.4</b>	<b>214.2</b>	<b>116.3</b>	<b>384.7</b>

**Fig 3: Green Belt releases in Policy SP11 (Emerging Local Plan Reg. 19, Table SP11.1, page 51)**

3.4 A proposed total Green Belt release of 384.7ha represents a significant release of Green Belt land, including a huge release at RAF Cosford (214.2ha).

- 3.5 These releases are in the context of a Local Plan which has been progressed through examination using the currently adopted NPPF, which does not require Green Belt releases to meet housing need (as opposed to the draft NPPF currently under consultation, which does). The transitional arrangements are such that the Local Plan Review will continue its examination under the previous version of the NPPF.
- 3.6 The proposed releases are also in the context of an authority where only a relatively small proportion of the District is Green Belt, as covered in Chapter 2 (**Fig 2**). In terms of the Applicant's proposals to build on circa 48ha of Green Belt, it would be disproportionate for such a large amount of housing to be built in Shropshire in such a relatively small portion of the District which is Green Belt.
- 3.7 The Council have followed a methodical approach in terms of considering sites for allocation. There were approximately 2,000 sites assessed in Stage 1 of the SA, sieved down to approximately 1,200 sites in Stage 3 (the CERDA Planning Report further discusses the reasons why the Site did not pass Stage 3).
- 3.8 Chapter 6 will cover 'The Context of Past & Proposed Growth of Albrighton'. It should however be noted that the Local Plan Review proposes a release of 19.9ha of safeguarded land *for future development* at Albrighton, again demonstrating that the Local Plan Review is not shying away from reviewing Green Belt land and is taking a long term view.
- 3.9 It is also worth noting that the Applicant's proposals to build on circa 48ha of Green Belt is completely out of proportion with any other housing greenbelt release proposed in any other parts of Shropshire (e.g. a 1.4 ha of Green Belt release for housing is proposed in Alveley).

## **4. The Context of Housing Delivery**

- 4.1 Shropshire Council annually prepares Five Year Housing Land Supply Statements to summarise the Shropshire five-year land supply and Shropshire housing delivery test position.
- 4.2 The current published Five-Year Housing Land Supply Statement has a base date of 31st March 2022. This assessment concludes that:
- 4.3 Shropshire currently has 5.64 years supply of deliverable housing land against the housing requirement identified within the adopted Core Strategy (2011) and 7.20 years supply of deliverable housing land against the local housing need, calculated using Governments standard methodology. This conclusion is supported in the following recent appeals reference 333170 dated 25/06/24 (paragraph 14) and 3334841 dated 20/08/24 (paragraph 22).
- 4.4 Housing delivery in Shropshire over the last 3 years has exceeded the housing needed for this period as calculated within the national housing delivery test (158% delivery) and as calculated locally against the housing requirement identified within the adopted Core Strategy (2011) (107% delivery).
- 4.5 As such, there is a five-year supply of housing land across Shropshire and the national housing delivery test has been met. Therefore, the relevant adopted plan policies remain up to date.
- 4.6 With regard to settlement guidelines for Albrighton, the published Five Year Housing Land Supply Statement (March 2022) identifies that as at 31st March 2022, for Albrighton 144 dwellings have been completed (since 2006/07) and a further 102 sites are with planning permission and 83 dwellings are allocations without planning permission since the 31st March 2022.

- 4.7 More recently, the AVAG have conducted their own research which demonstrates that there are 771 dwellings allocated or safeguarded in Albrighton (**Appendix X**).
- 4.8 Given the number of completions and commitments identified there is considered to be a sufficient supply of housing for Albrighton, with the adopted residential guideline for Albrighton being achievable within the plan period and as such there is no need to consider alternative sites outside of the development boundary.

## 5. The Context of The Black Country’s Unmet Need

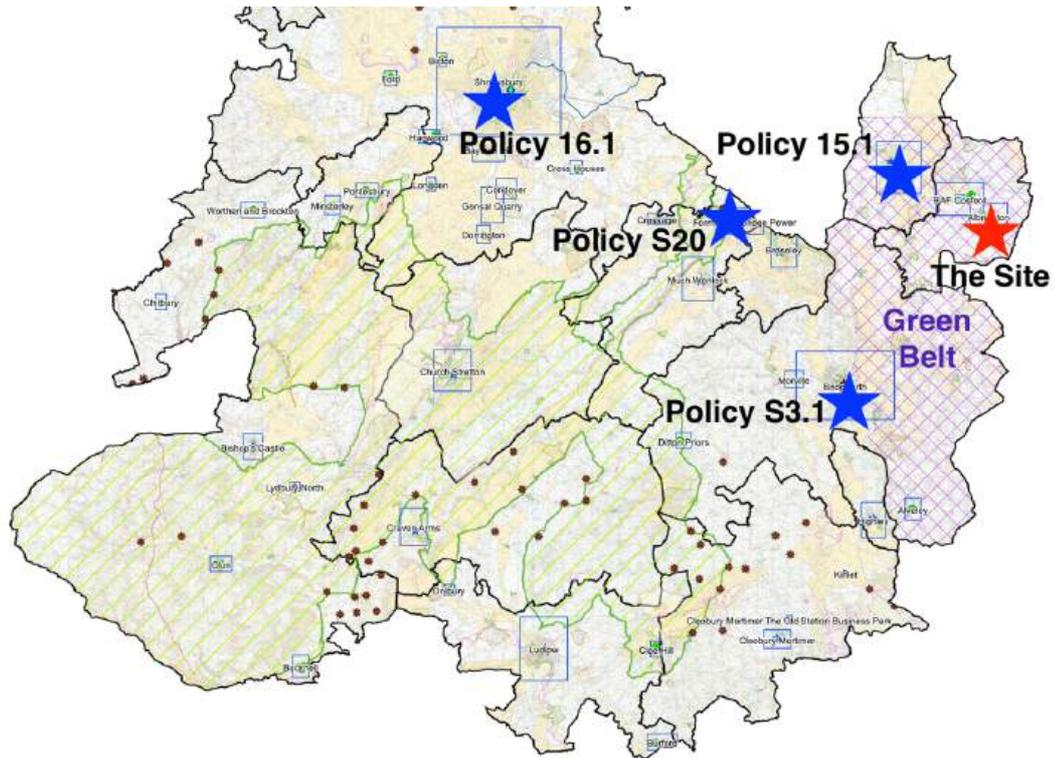
- 5.1 As part of the Examination into the Local Plan Review, the Planning Inspectors have identified a few areas of the draft Shropshire Local Plan which they consider will require the Council to undertake further work before progression to Stage 2 hearing sessions.
- 5.2 In the ‘Inspectors’ Interim Findings following Stage 1 Hearing Sessions’ (**ID28, in Appendix 1**), paragraph 21 specifies that for “the purpose of effectiveness, there is a need for the Council to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work”.
- 5.3 The Council have responded to this by undertaking additional SA and site assessment work to inform the identification of sites to accommodate the **proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country.** The Council confirm that “reflecting the outcome of this work, a series of proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications (**GC24 paragraphs 7.19-24, Appendix 2**).”
- 5.4 The sites identified to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country are set out in **Fig 4** below.

Site ref / Policy	Site Name	Total Capacity	Black Country Contribution
BRD030 <b>(Policy S3.1)</b>	Tasley Garden Village, Bridgnorth	1,050 dwellings 16ha employment land New local centre	600 dwellings

		20ha of green infrastructure and a 19ha linear park	
SHF018b & SHF018d <b>(Policy 15.1)</b>	Land east of Shifnal Industrial Estate, Upton Lane, Shifnal	39 hectares (15.6ha net development)	30ha of employment land
SHR060, SHR158 & SHR161 <b>(Policy 16.1)</b>	Land between Mytton Oak Road and Hanwood Road, Shrewsbury	1,500 dwellings 5ha of employment land	300 dwellings
IRN001 <b>(Policy S20)</b>	Former Ironbridge Power Station	Range of local services and facilities Around 1,000 dwellings Around 6ha of employment land  Extensive green infrastructure	600 dwellings

**Fig 4: Sites Identified to Accommodate the Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country (Taken from Table 7.1 of GC24)**

5.5 The location of sites selected to contribute to the unmet need (and their geographic relationship to the Black Country, located to the east of the District) are displayed graphically in **Fig 5**.



**Fig 5: Overarching Policies Map (Emerging Local Plan Reg. 19, Appendix 1 – adapted by ET Planning to show 4 sites proposed for apportioned Black Country need in blue and the Site in red)**

- 5.6 In terms of the duty to cooperate, and the location of sites (within Shropshire) to meet the needs of the Black Country, the Council have considered migration, travel to work areas, commuter links and geography in determining where the unmet need should be met.
- 5.7 Boningale Homes have produced representations to the recent Local Plan Consultation on GC25, GC44, GC45 and GC46 (June 2024, **Appendix 3**), relating to the further work needed relating to the Black Country’s unmet need. We comment below on three key points raised within these representations:

*"3.27 It is not positively prepared or justified to rely on existing commitments and windfall development to meet the indicative level of housing required."*

- 5.8 Regarding a windfall provision, Shropshire Council have taken a consistent approach to all settlements. It is not unusual for an LPA to include a windfall allowance to allow for infill developments, conversions and other small scale developments which inevitably come forward in any given settlement.
- 5.9 The Council are proposing to provide Albrighton with a relatively small windfall allowance (48 dwellings) acknowledging the settlement is constrained by Green Belt. Windfall therefore contributes a very small proportion to the settlements growth strategy, applying BH's comments specifically to Albrighton.
- 5.10 It should also be noted in terms of the Proposed Development that it would represent a hugely disproportionate increase - a 1,733% increase on the settlements windfall allowance of 48 dwellings. BH are proposing to disproportionately exceed the settlements proposed windfall allowance.

*"3.22 Further, we have significant concerns with regard to the Council's stated reliance on windfall development, not least because with specific regard to meeting unmet housing needs, it is essential to ensure that growth is met as close to the area from which the need is arising and a reliance on windfall development does not allow for this to be controlled."*

- 5.11 Windfall development is **not** being used to meet the unmet housing needs of the Black Country. The 1,500 dwellings are being provided through 3 proposed housing allocations set out in Fig 4. It is therefore unclear what argument BH are trying to advance in 3.22.
- 5.12 *"6.7 The Council should seek to allocate additional land, as close to the Black Country as possible"*

- 5.13 It is significant that the Council consider locations as far west as Shrewsbury to be appropriately located to contribute towards meeting the unmet needs of the Black Country. We consider this approach to be logical given the regularity of public transport services for higher order settlements such as Shrewsbury compared to Albrighton (see Chapter 7, which considers how Albrighton's public transport connectivity has been over-exaggerated in the evidence base for the Local Plan Review - given how Albrighton's train services have been reduced in frequency and speed to Birmingham recently).
- 5.14 In other words, through the findings of the site selection process, the Council's strategy and methodology is not predicated on locations which are in close proximity (geographically) to the Black Country (and, as it follows, not predicated on Green Belt locations).
- 5.15 This is logical because whilst the Site is geographically closer to the Black Country (compared with Shrewsbury), its connectivity is worse. This means that they would need to be a reliance on car travel, should Albrighton be expected to contribute to the unmet needs of the Black Country.
- 5.16 It is therefore not an argument for the Proposed Development being consented based on its geographic location in respect of the Black Country, compared with other parts of Shropshire (the considerations are more nuanced).
- 5.17 In any case, the Council have undergone a rigorous site selection process for this exercise, and it should be for the 'plan led' process to determine how Shropshire as a District should contribute. The Council's 'Additional Sustainability Appraisal Report' (GC44, April 2024) considered 450 sites at Stage 2a and 230 sites at Stage 3. Whilst the Council do not make it clear which proportion of sites considered fall within the Green Belt, Green Belt only affects Albrighton, Brignorth and Shifnal (of settlements considered).

Therefore the majority of sites considered were not Green Belt (e.g. those in Shrewsbury) and these non Green Belt sites are all sequentially preferable to the BH's site (should further sites need to be found), given Green Belt should be developed as a last resort.

- 5.18 In summary, the Council's approach to meeting the Black Country's unmet need is justified, and BH cannot use alleged flaws with the process to justify the Proposed Development.

## 6. The Context of Past & Proposed Growth of Albrighton

6.1 Albrighton is identified as a Key Centre within the adopted (and emerging) Local Plan (Core Strategy Policies CS1 and CS3, and SAMDev Plan Policy MD1). The adopted Development Plan is considered to be compliant with the NPPF and still 'fit for purpose'.

### SAMDev Plan

6.2 Policy S1 of the SAMDev Plan relates to the Albrighton area and is worded as follows:

#### *S1: Albrighton Area*

##### *S1.1: Albrighton Town Development Strategy*

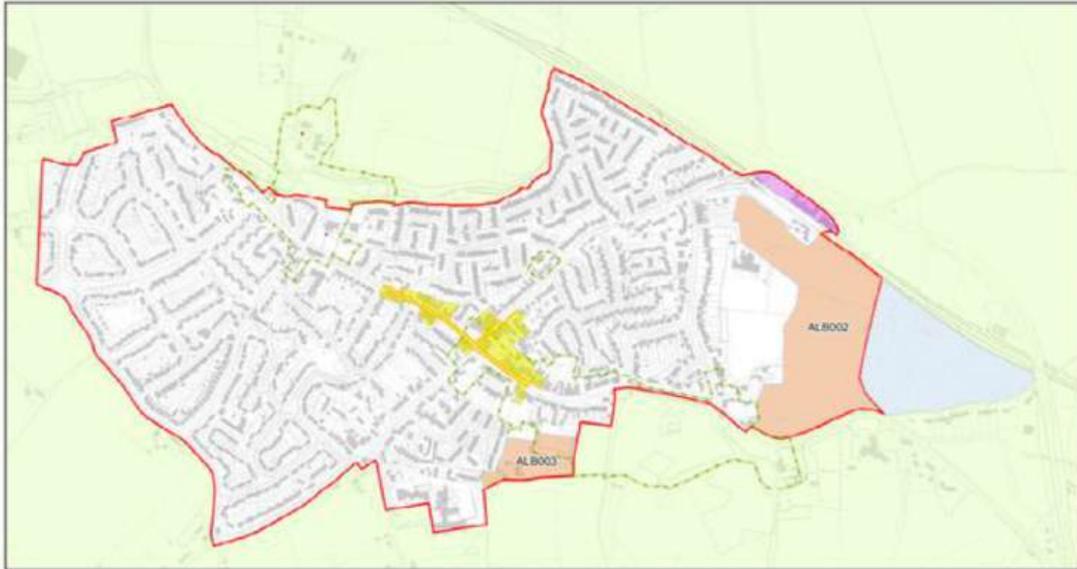
*1. Albrighton will provide for local needs, delivering around 250 dwellings over the Plan period. Local needs will predominantly be met on two allocated sites, with small-scale windfall development within the development boundary making up the balance.*

*2. Land is allocated for housing development as set out in Schedule S1a below and identified on the Policies Map.*

*3. Land to the east of site ALB002 is safeguarded for the village's long-term development needs. Only development which would not prejudice the potential future use of this land to meet Albrighton's longer term development needs will be acceptable on the safeguarded land during the plan period.*

*4. Retail development will be directed to the village centre where it will benefit from, and contribute to, the town's historic character. The Primary Shopping Area on the High Street is protected for retail uses in accordance with Policies CS15 and MD10a.*

5. All development proposals should have regard to the Albrighton Plan.



**Fig 6: SAMDev Plan allocations for Albrighton (Housing Allocations ALB002 and ALB003 shown in peach, protected employment land shown in purple, safeguarded land shown in blue)**

6.3 SAMDev Policy MD3 is relevant where proposals for new housing development come forward outside of allocated areas. The policy sets 5 tests (in MD3.2) which need to be met and is worded as follows:

*MD3.2.*

*The settlement housing guideline is a significant policy consideration. Where development would result in the number of completions plus outstanding permissions providing more dwellings than the guideline, decisions will have regard to:*

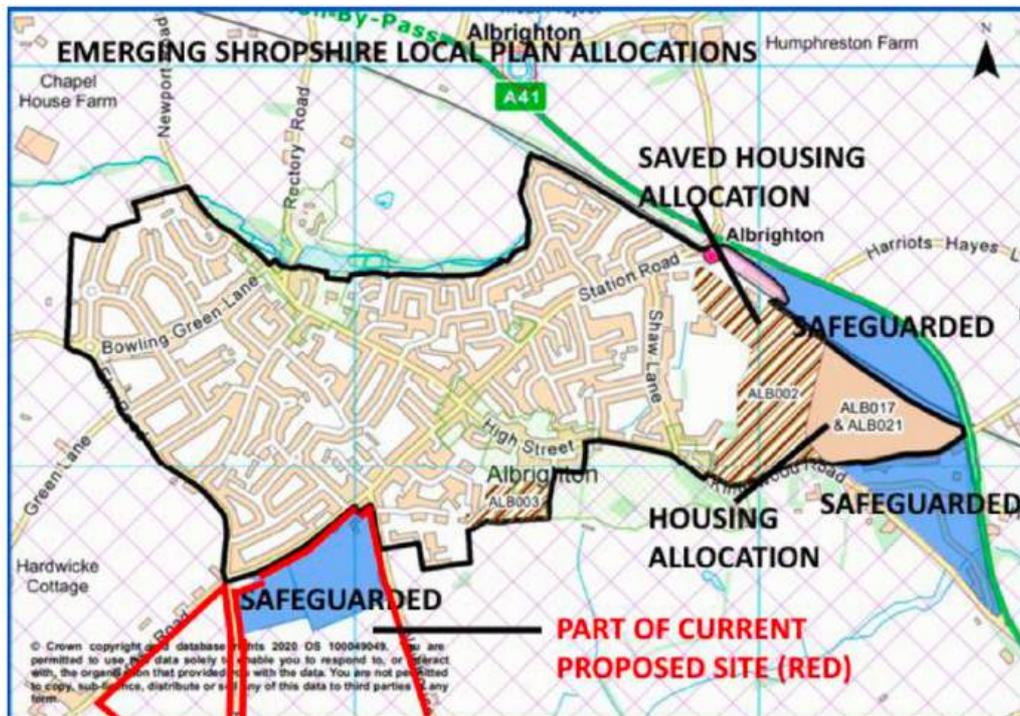
- i. The increase in number of dwellings relative to the guideline; and*
- ii. The likelihood of delivery of the outstanding permissions; and*
- iii. Evidence of community support; and*
- iv. The benefits arising from the development; and*

*v. The presumption in favour of sustainable development.*

- 6.4 The Proposed Development advanced by BH does not comply with Policy MD3, as discussed in the CERDA Planning Report on behalf of AVAG.

**Emerging Local Plan**

- 6.5 Albrighton is proposed to remain a key centre, as identified through Draft policy SP2: Strategic Approach. The draft settlement policy S1.1 sets out the level of development for Albrighton during the plan period proposing to deliver around 500 dwellings and around 5 hectares of employment development. The draft settlement policy seeks to deliver the new residential development through the saved SAMDev site allocations and proposed site allocations (ALB017 & ALB021). This would be complimented by appropriate small scale windfall residential development within the Albrighton development boundary shown on the policies map. The site subject to this preapplication remains outside the development boundary within the countryside and part of the Green Belt.



**Fig 7: Emerging Shropshire Local Plan allocations for Albrighton (Proposed Housing Allocations ALB017 and ALB021 shown in peach, and proposed safeguarded land shown in blue)**

- 6.6 There are three portions of land around Albrighton proposed to be 'taken out' of the Green Belt and identified as safeguarded land. This land is identified in draft policy S1, 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 specifically identified in order to meet any sustainable development needs for Albrighton which may exist beyond the draft Local Plan period.
- 6.7 The AVAG have conducted their own research which demonstrates that there are 771 dwellings allocated or safeguarded in Albrighton (**Appendix 4**), which is an over-provision against draft settlement policy S1.1.

## 7. Appropriateness of Albrighton for Further Growth

7.1 As discussed in the previous chapter, Albrighton has a 'planned for' and sustainable level of growth, much of which takes the form of already committed sites with planning permission. This is summarised in **Fig 8** below.

Settlement	Type of Settlement	Residential Development Guideline	Total Residential Completions (2016/17, 2017/18 and 2018/19)
Albrighton	Key Centre	500	24

Total Residential Commitments			Windfall Allowance
Sites with Planning Permission or Prior Approval (as at 31st March 2019)	Saved SAMDev Plan Allocations without Planning Permission (as at 31st March 2019)	Local Plan Allocations	
171	77	180	48

**Fig 8: Residential Development Guidelines and Residential Supply (Emerging Local Plan Reg. 19, Appendix 5, page 345)**

7.2 The residential development guideline of 500 for the period up to 2038 has already been planned for through combination of completions, sites with planning permission, saved SAMDev Plan allocations, Local Plan allocations, and a windfall allowance. As discussed elsewhere in this Statement, the AVAG have conducted their own research which demonstrates that there are 771 dwellings allocated or safeguarded in Albrighton (**Appendix 4**).

7.3 In terms of the methodology to inform the 'residential development guideline', this figure represents a sustainable growth of the settlement, taking account of its position in the overall settlement hierarchy, including its services and facilities and public transport connectivity (which, as we consider in chapter 8 has been over

exaggerated - and therefore the residential development guideline of 500 dwellings for Albrighton should be an upper limit).

- 7.4 The Council are not taking the position of some LPAs, which is no growth to greenbelt settlements. In quite a fact quite the opposite. The council in knowledge is that sustainable growth is important within settlements constrained by greenbelt, including to help support the vitality and the viability of the services they offer. An allowance of 500 dwellings over the plan period is considered to be suitably ambitious and will help a settlement grow in a sustainable way i.e. 'will allow for the needs of the residents of..towns and its surrounding rural hinterland to be achieved' (Emerging Local Plan, paragraph 5.54).
- 7.5 On top of this, the LPA are safeguarding further planned for the next plan period. In effect, Albrighton has two plan periods worth of growth planned for, which represents effective and positive planning for the settlement.
- 7.6 The Outline application is for 800 dwellings and a care home of up to 80 units (net increase of 880 units total).
- 7.7 Albrighton has a 'dwelling estimate' of 2,205 dwellings, accommodating a population estimate of 4,870 inhabitants (Hierarchy of Settlements Topic Paper, August 2020, page 25).
- 7.8 The Proposed Development would represent a hugely disproportionate increase:
- 40% of the existing 'dwelling estimate'
  - 176% of the settlements development guideline
  - 1,733% increase on the settlements windfall allowance of 48 dwellings.

**7.9 This would not represent sustainable growth of the settlement.**

## 8. Review of Settlements Sustainability Credentials

8.1 In the emerging Local Plan, Albrighton is proposed to remain as a key centre, as identified through Draft policy SP2: Strategic Approach.

Regular Public Transport Service Offered During Peak Travel Times'

8.2 However since the publication of the Local Plan’s evidence base, one of main components of the settlements proposed classification has fundamentally changed, which is whether a ‘Regular Public Transport Service Offered During Peak Travel Times’.

8.3 This relates to the recent changes to the train timetable - high speed trains now no longer stop at Albrighton. Therefore the frequency of trains to Birmingham and Shrewbury have changed quite dramatically (**Appendix 5**).

8.4 By way of background, the Table assessing Albrighton taken from Table 10 of the Hierarchy of Settlements produced by Shropshire Council (Aug 2020) to support their emerging Local Plan is set out below

Criterion	Scoring
Public Transport Link	5
<b>Regular Service Offered During Peak Travel Times</b>	<b>5</b>
<b>Nursery/ Pre-School</b>	<b>6</b>
Primary School	6

Secondary School	0
Hospital	0
NHS GP Surgery	4
NHS Dentist	3
Chemist/Pharmacist	4
Supermarket	3
Convenience Store	6
Post Office	4
Bank / Building Society	3

**Fig 9: Table taken from Table 10 of the Hierarchy of Settlements produced by Shropshire Council (Aug 2020) to support their emerging Local Plan**

8.5 The Council explain the scoring as follows:

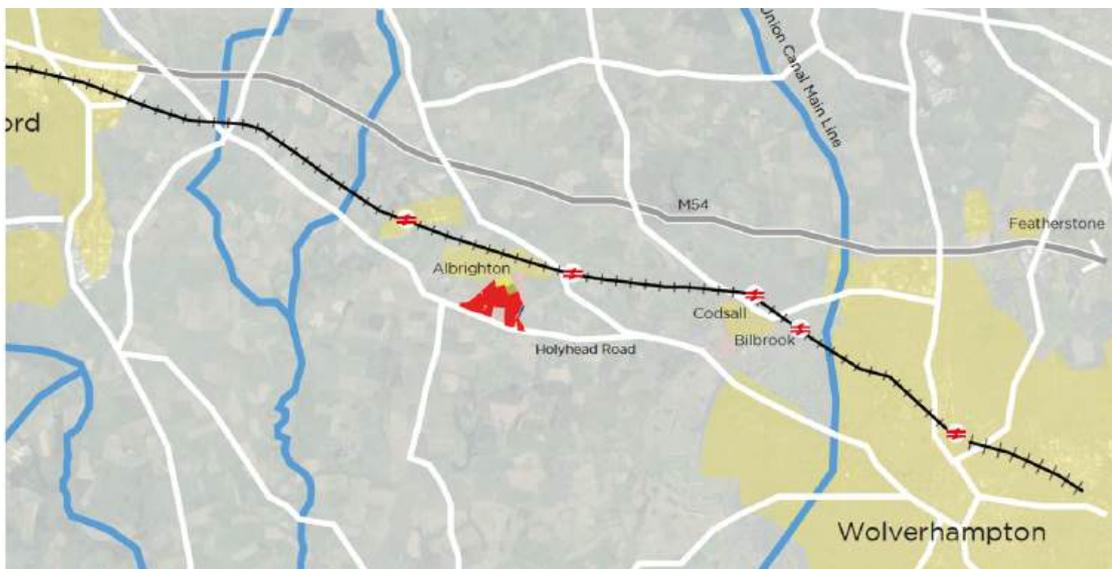
*5.14. For the purpose of scoring services and facilities, 'weighting' was applied to the points awarded, in order to reflect the fact that some services are considered 'necessary to meet resident's day to day needs' whilst others are 'nice to have but not essential'.*

*5.15. Furthermore, in recognition of the increased capacity and resilience offered where there is more than one provider of the same service or facility within a settlement, additional points were awarded in circumstances where there were two or more of the same service or facility available within a settlement.*

8.6 The Council have defined a 'regular service' as:

5.27. If the rail or bus services offered were regular, during peak travel times, the settlement was awarded a further 5 points. A service is considered regular and offered during peak travel times when it runs an outward service between 06.00 and 09.00, and a return service between 15.00 and 18.00, Monday-Friday.

8.7 Whilst the existing train and bus services technically meet this definition (bus services finish at 18.00), we challenge the Councils definition of what constitutes a regular service.



**Fig 10: Extract of map taken from the Design & Access Statement (Figure 2.1) produced by Cass Design on behalf of Boningale Homes. Map shows site in red and its relationship to railway, waterways and motorway**

8.8 An hourly train service at peak times and a bus service which finishes at 18.00 should not be 'deemed' as regular. The reality is people would rely on travel by car to get to surrounding destinations.

8.9 Under the Council's scoring a 'Regular Service Offered During Peak Travel Times' is offered a score of either 0 or 5. Albrighton achieves the top score of 5 and this is disputed for the reasons given above.

Nursery/ Pre School

- 8.10 Albrighton receives the top score of 6 for nursery/pre-school. Again, we dispute this score.
- 8.11 Relating to childcare facilities for under 3's, as of January 2023 there has been no nursery provision for under 3's in the village. Albrighton Primary were the last facility to close for all year round childcare for under 3's and now only offer term time care for 3 year olds plus (of which there is a substantial waiting list).
- 8.12 Relating to childcare facilities for over 3's, St. Mary's Nursery, Shaw Lane, has a waiting list of 24 months for a full time, term time, place for children for over 3's. The earliest a resident could access childcare, term time, Monday to Friday is September 2026.
- 8.13 The only other option is a private day nursery - Birchfield Prepcare. This is located outside Albrighton on Harriet Hayes Lane, is more expensive, and also has a waiting list of 1 year for 3 years old plus (additionally it is only accessible via car as access involves crossing the A41).
- 8.14 There is no all year round childcare facility available for babies or pre-school age in the village at all.
- 8.15 Holiday clubs are run for school age children only at Albrighton primary, limited availability, and on selected holiday days/weeks (varies) and is always over subscribed.
- 8.16 At the moment St Mary's Albrighton does not offer a regular school holiday club provision for working parents. Parents have to travel to Shifnal for that facility.
- 8.17 We therefore dispute why Albrighton receives the top score of 6 for nursery/pre-school.

Summary

- 8.18 In the emerging Local Plan, Albrighton is proposed to remain as a key centre, as identified through Draft policy SP2: Strategic Approach.
- 8.19 However since the publication of the Local Plan's evidence base, one of main components of the settlements proposed classification has fundamentally changed, which is whether a 'Regular Public Transport Service Offered During Peak Travel Times'. We also dispute why Albrighton receives the top score of 6 for nursery/pre-school.
- 8.20 We would therefore question the scoring given to Albrighton by the Council (and its overall settlement ranking, which has been exaggerated). This is also relevant to BH's current planning application in Albrighton and a discussion about where further growth should be located in Shropshire.

## 9. Conclusion

- 9.1 This Sustainability Statement has been prepared by ET Planning on behalf of Albrighton Village Action Group ('AVAG'). The proposed development by Boningale Homes ('BH') in Albrighton presents significant challenges concerning its appropriateness and alignment with both current and emerging local policies. The evidence suggests that the proposed development, which includes 800 dwellings and a care home, vastly exceeds the sustainable growth limits identified in the existing and emerging Local Plans. Albrighton is recognized as a key centre within the Shropshire settlement hierarchy, but its capacity for additional growth must be carefully balanced against the constraints of its Green Belt location, the existing infrastructure, and the community's needs.
- 9.2 The currently proposed residential development guideline of 500 dwellings, which has already been accounted for through existing permissions, allocations, and windfall allowances, represents a carefully considered figure for sustainable growth for Albrighton. The proposed development's scale, representing a 176% increase over this guideline, would be a stark deviation from this strategy and would likely overwhelm the settlement's infrastructure, character, and community services. Furthermore, the potential population surge of over 40% in a single development phase would disrupt the balance that the Local Plan seeks to maintain across the district's settlements.
- 9.3 Additionally, the recent downgrades in Albrighton's public transport connectivity, specifically the reduced train services to Birmingham and Shrewsbury, undermine one of the critical factors that justified its classification as a key centre. This shift necessitates a reassessment of Albrighton's capacity for further growth, as its reduced connectivity could lead to increased reliance on car travel,

contradicting sustainability goals and exacerbating traffic and environmental impacts.

- 9.4 The proposal also raises concerns about the integrity of the Green Belt, which is intended to prevent urban sprawl and maintain the distinct character of settlements. The excessive scale of the proposed development within this protected area conflicts with both national and local policies that advocate for the Green Belt to be developed only as a last resort and only in cases where exceptional circumstances are demonstrated. The disproportionate size of the proposed Green Belt release for this development would set a concerning precedent, undermining the strategic planning objectives that guide the sustainable and equitable distribution of development across the district.
- 9.5 Moreover, the context of unmet housing needs from the Black Country, which the Shropshire Local Plan is partially designed to address, does not justify this development. The Local Plan's approach to accommodating these needs has been methodical and justified, focusing on strategic sites that are better suited in terms of location, infrastructure, and environmental impact. The argument that Albrighton, due to its proximity to the Black Country, should absorb a significant portion of this unmet need is not supported by the evidence, particularly given the site's poor connectivity and the rigorous site selection process undertaken by the Council, which prioritised non-Green Belt sites.
- 9.6 In conclusion, while Albrighton is recognised for its role within the Shropshire settlement hierarchy, the proposed development far exceeds the scale of growth that is sustainable and appropriate for the settlement. It disregards the carefully balanced policies aimed at maintaining the integrity of the Green Belt, ensuring sustainable development, and supporting the long-term vitality of Albrighton and

its surrounding areas. The proposed development, therefore, should not proceed as it is currently conceived. Instead, growth in Albrighton should continue to be guided by the principles of sustainable development as outlined in the Local Plan, ensuring that any future development is proportional, well-supported by infrastructure, and aligned with the community's needs and environmental protections

**Report Prepared by:****David Wetherill** BA (Hons), MSc, MRTPI

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## APPENDIX 1

**ID28**

**Shropshire Council. Examination of Shropshire Local Plan 2016-2038**

**Inspectors:** Louise Crosby MA MRTPI, Carole Dillon BA (Hons) MRTPI and Nick Palmer BA (Hons) BPI MRTPI

**Programme Officer:** Kerry Trueman

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Mr West  
Planning Policy  
Shropshire Council  
PO BOX 4826  
Shrewsbury  
SY1 9LJ

15 February 2023

Dear Mr West

**Inspectors' Interim Findings following stage 1 hearings sessions**

1. Set out below are our interim findings in relation to a number of matters following the stage 1 hearing sessions in July last year and January this year. Some of these findings require the Council to do additional work and some are just confirming Main Modifications (MMs) that were agreed at the hearings and other matters that were discussed, such as updating the evidence base.

*Duty to Cooperate (DtC)*

2. Following the hearing sessions, we wrote to you on 26 July 2022 (ID17) asking for you to provide more information in relation to the DtC and the activities that took place in relation to this prior to the submission of the Plan for examination.
3. We have now received this and had a chance to consider it and hear from the Council and representors on the matter at a further hearing session on 17 January 2023. Consequently, we can confirm that we are satisfied that the Council has met the legal duty set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), in so far as it imposes a duty on a local planning authority to co-operate with other local planning authorities, the County Council and prescribed bodies or other persons by engaging constructively, actively and on an ongoing basis in relation to the preparation of a development plan document so far as relating to a strategic matter to maximise the effectiveness of the activity of plan preparation. Therefore, the examination can proceed.

## Next Steps

4. Before we proceed to stage 2 hearing sessions there are a number of matters where we consider more work is necessary to make the plan sound and these are set out below. We have also taken this opportunity to set out our thoughts on other matters which we said we would give further thought to at stage 2 of the examination.

## *Plan Period*

5. During the matter 1 hearing session the Council agreed to consider whether the Plan period and Local Housing Needs Assessment should be aligned along with any implications of doing so, including those relating to the Housing Requirement set out in policy SP2 and the supply of sites identified in Policies S1 to S21. Please advise what stage the Council have reached with this.

## *Saved Policies*

6. During the matter 3 hearing session the Council agreed to review the means by which the necessary SAMDev policies would be “saved” to ensure that they will, as intended, remain extant for Development Management purposes should the Plan be adopted. Can you please provide further information on how the Council intends to do this, along with any necessary MMs.

## *Gypsy and Traveller Transit Site Provision*

7. During the matter 5 hearing session the Council agreed to provide a cabinet report and minutes regarding new transit site provision for the Gypsy and Travelling community. Can this please be placed on the examination website.
8. Also, as part of the matter 5 hearing session, the Council provided an updated position in respect of the need and supply of pitches. Using this data can the Council please update Table 7.9 and the GTAA conclusion and executive summary as an addendum to the 2019 GTAA Update – Final Report. The Plan’s relevant supporting text should be reviewed in view of this.
9. The Council will be aware of the judgment *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022, regarding the interpretation of the Planning Policy for Traveller Sites and the application of that policy to Gypsies and Travellers who have ceased to pursue nomadic lifestyles. Can the council please consider whether, in light of this judgment, they wish to review the traveller site needs in the GTAA, and if not, the justification for this?

## *Unmet Housing and Employment Land Needs of the Association of Black Country Authorities (ABCA) and Policy SP2*

10. The Council has identified the need for housing in the County as being 28,750 homes (1430 dwellings per annum) over the Plan period, based on the ‘high growth scenario’ and 300 ha of employment land based on a ‘balanced employment growth scenario’, as set out in the Sustainability Appraisal and Site Assessment Environmental Report, dated December 2020 (SA). The housing

requirement figure in policy SP2 is around 30,800 homes (1400 dwellings per annum) and the employment land requirement is around 300ha. The increase in the total quantum of housing is to take account of the different time period. The annual requirement is virtually the same. However, it is the Council's intention that the Plan should provide 1,500 new homes and 30ha of employment land over the plan period in order to help address a need for housing and employment land in the Black Country, that would otherwise not be met. We consider the question of this unmet need further below.

11. At the hearings, the Council suggested that these 1,500 new homes and 30ha of employment land is accounted for within the aforementioned housing and employment land requirement in policy SP2. We cannot see how. They are not mentioned in the SA and form no part of the growth scenarios considered therein. Consequently, we are concerned that there has been a conflation of housing need and housing requirement and also employment land need and employment land requirement – but these are two distinctly different things.
12. You will appreciate that we need clarity on this point, and the Plan itself must also be equally clear. We therefore ask that the Council provides us with a Topic Paper that unambiguously sets out the need for housing over the plan period and the local plan's housing requirement and the same for employment land. On the face of it, it seems to us that the latter is likely to be the sum of Shropshire's housing/employment need plus the 1,500/30ha homes/employment land relating to unmet need in the Black Country – whatever the case may be, these requirement figures should be made clear in the Plan, through a main modification to policy SP2.
13. This strategic issue crosscuts a number of important matters, including the Plan's development requirements, spatial distribution, Green Belt release and site allocations. As such, it has resulted in a great deal of discussion during the hearing sessions to date. The Council's approach to identifying the housing and employment land needs derived within Shropshire itself is sound. In principle, the Council's intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire's housing need to meet some of this externally derived unmet need.
14. Since the initial stage 1 hearings the joint plan making arrangements for the ABCA Councils have materially changed as these four separate councils are now preparing individual plans. The councils are all individually preparing their respective evidence bases, but utilising some of the existing joint evidence that has already been prepared. As a consequence, their anticipated adoption dates will be later than that of the previously proposed joint plan. Despite this new plan making context, there is no reason before us to find that the identified unmet needs in the Black Country area will disappear.

15. However, we are mindful that confirmation of the exact quantum requires the examination of these plans which is some time away and other councils will also be assisting in meeting some of the unmet needs since it is not and should not be the sole responsibility of Shropshire Council to meet all of ABCAs unmet needs for housing and employment land. This would be highly unlikely in any event given the emerging scale of unmet need, the Green Belt constraint within Shropshire, particularly in the part closest to the boundary with ABCA areas and also the AONB constraint in the southern part of the plan area. Nonetheless it remains an important strategic cross boundary matter that should not be deferred.
16. It is clear is that the unmet housing and employment needs being accommodated in Shropshire is the starting point as there is agreement to revisit the unmet need with a view to providing further assistance once the local plans for the ABCA councils have been examined and adopted. As set out above this is likely to be a number of years away given the stage they are currently at.
17. However, it was not until a point between the Regulation 18 and 19 stages of the plan making process that the Council agreed to accommodate 1500 dwellings and 30ha of employment land to support the unmet needs emerging in the ABCA area. This was after most of the evidence base had been completed, including the SA.
18. Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires that an environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing the plan policies and of the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The SA will need to show how these requirements have been met as well as recording the wider assessment of social and economic effects.
19. We are concerned that the objectives and geographical scope of the Plan changed when the Council agreed to accommodate some of the unmet needs of the Black Country, but unfortunately the SA was not revisited. The SA is based on meeting only the needs of Shropshire. It tested different housing and economic growth options as well as different distribution options, but these were all based on just meeting the needs of Shropshire.
20. Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country. In carrying out this work, consideration also needs to be given to the selection of the preferred strategy when judged against reasonable alternatives. For example, by testing a scenario which includes the originally envisaged ‘high growth scenario’ and a contribution towards unmet housing needs.
21. If the intention is to contribute towards the unmet need from the Black Country, then for effectiveness this distinction needs to be set out in the housing and employment land requirements in the Plan. In doing so the Council will also

need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.

22. If, following the additional SA work, the Council chooses to pursue the same growth option as before then it follows that the housing and employment land requirements will increase, and more sites will be required. Consideration will also need to be given to the distribution of development since accommodating some of the unmet needs may result in more sites being required in the part of Shropshire nearest the Black Country. It would therefore be helpful if, once the Council has carried out the additional SA work, the proposed strategy in relation to the housing and employment land requirement is set out in the topic paper requested at paragraph 12 above. The Plan should also make clear what the Council's strategy is, through main modifications.
23. Given the Council were planning on releasing Green Belt land to meet its own needs, it seems unlikely that the unmet needs of the Black Country could be met without the release of Green Belt land. Can the Council please provide a revised Green Belt Topic Paper setting out the exceptional circumstances for releasing Green Belt land to meet its own needs and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.
24. Great importance is placed on Council's having up to date plans by national planning policy. As set out above there is a requirement to carry out additional work on the SA and to produce topic papers and some main modifications to the Plan once the SA work is complete and there a clear way forward. This is likely to require a pause in the examination whilst the work is undertaken. Once the work has been undertaken, we will take a view on whether we consider further public consultation is required. The need to carry out this additional work will delay the examination and adoption of this Plan. However, we are unable to identify an alternative remedy that would avoid such a delay unfortunately. The additional work we have identified is necessary for us to find that the Plan is sound.
25. Regardless of the outcome of this work, it is likely that there will be a further request from the individual Black Country authorities in the future to meet some more of the unmet needs, but this could be dealt with by way of an early review trigger built into policy SP2 or by relying on the statutory 5-year review process set out in the Framework. We would welcome the Council's formal views on these alternative approaches.
26. Furthermore, we note that the related indicators and targets set out in the Plan's monitoring framework only focus on delivery within the Plan area against the Plan's overall proposed development requirements. In addressing some of the unmet needs of ABCA then the Plan's performance in doing so needs to be monitored. A failure to do this would undermine the effectiveness and therefore soundness of the Plan's approach to meeting housing and employment needs. The monitoring framework will need to be reviewed in light of this concern.

27. Any changes to the Plan as a result of the above will need to form the basis of Main Modifications which should be submitted to the examination.

#### *Habitat Regulations Assessment*

28. The matter of the River Clun and nutrient neutrality was discussed at the hearings in July. Shortly after the hearings the Government issued a Written Ministerial Statement (WMS) entitled '*Statement on improving water quality and tackling nutrient pollution*'. The Council's letter of 16<sup>th</sup> September 2022 (GC16) addresses the WMS. This suggests that the WMS may alter the position of Natural England and the Environment Agency on this matter. Can the Council please approach these organisations with a view to preparing updated SoCG. Once this is done can the Council advise on the implication of the latest position for the Plan and whether any outstanding issues could be dealt with by MMs.

#### *Green Belt – RAF Cosford*

29. The Council's Green Belt Topic Paper sets out the exceptional circumstances for the release of land from the Green Belt. This includes 214.2 ha of land at RAF Cosford which is a strategic site in the Plan (policy S21). The Council proposes to inset RAF Cosford in the Green Belt, in recognition of its existing and future operational areas and requirements. Para 7.18 of the Plan says that this will enable numerous and complementary development opportunities and that in turn these will complement and facilitate delivery of the Economic Growth Strategy for Shropshire and the objectives of the Plan.
30. One of these development opportunities is the development of the Midlands Air Ambulance Charity headquarters, however we understand that this now has planning permission despite it being in the Green Belt, demonstrating that this was not a barrier to development. The RAF base has grown and developed over many years and is now also home to the RAF Museum Cosford. There is no evidence before us to demonstrate that the site's Green Belt status has in anyway prevented it being developed in a manner consistent with its use as an RAF base or indeed related activities such as training facilities and domestic accommodation.
31. Paragraph 143(b) of the Framework which advises that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open. However, it seems that the site has large areas of undeveloped land which, if developed, could harm openness of the surrounding Green Belt land. It would also make it more difficult for the Council to control future non-military related development on the site as other general development management policies would apply.
32. To summarise, we find that exceptional circumstances do not exist to justify the removal of this site from the Green Belt. Consequently, the Council will need to draft a MM to ensure that this site remains within the Green Belt and make any necessary map changes.

### *Infrastructure Delivery Plan (IDP) and Strategic Funding Statement (SFS)*

33. We still have some concerns about the gaps in the IDP and would urge the Council to treat this as a living document and aim to keep populating it when new figures become available.
34. In terms of the SFS, as set out at the hearings this should be forward facing rather than backward looking. The PPG advises that *“this should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the Plan-period”*<sup>1</sup>. Can the Council please provide a timescale for updating the SFS.

### *Five-year Housing Land Supply*

35. The Council has requested that we confirm their 5-year housing land supply as part of the examination of the Plan policies. However, the PPG<sup>2</sup> advises that, among other things, *“when confirming their supply through this process, local planning authorities will need to be clear that they are seeking to confirm the existence of a 5-year supply as part of the plan-making process and engage with developers and others with an interest in housing delivery”*. Crucially, the Council have confirmed that they did not do this and therefore we cannot confirm the 5-year housing land supply through the local plan examination process.
36. In addition, the matter of 5-year housing land supply will be considered at stage 2 of the examination once we have examined the site allocations in the Plan. We still have serious doubts over whether we can fully consider this matter and come to a conclusion on whether the Council have a 5-year supply of housing land given that many of the sites the Council are relying on are allocated in the SAMDev plan and therefore are not before us.

### *Housing Requirement*

37. The housing requirement in the Plan is expressed as ‘around’ 30,800 new homes and the employment land as ‘around’ 300ha. In our view these development requirements should be expressed as definitive minimum figures for both monitoring and effectiveness.

### *Specialist Housing/Older Persons Housing*

38. Paragraph 62 of the Framework requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including older people. The Council’s evidence shows that there is a much higher number of older people residing in the Plan area than the national average.

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<sup>1</sup> Paragraph: 059 Reference ID: 61-059-20190315

<sup>2</sup> Paragraph: 010 Reference ID: 68-010-20190722

39. Whilst there is a requirement within policy DP1 to provide older persons housing on sites of 50 dwellings or more, the amount that will need to be provided is not quantified and it is also not clear why the threshold of 50 dwellings has been chosen. The PPG advises that “*plan-making authorities should set clear policies to address the housing needs of groups with particular needs, such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period (our emphasis)*”<sup>3</sup>.
40. Whilst the PPG advises that Council’s ‘could’ provide indicative figures, we consider that as there is clear evidence of a higher-than-average need for such accommodation in this particular instance, either the policy should include indicative figures, or the Plan should contain a specific policy to deal with specialist housing.
41. Also, neither this Plan, nor the SAMDev plan appear to make any provision for this sector of the community, by allocating land for specialist housing or requiring it to be provided in some of the larger allocations. This would be another positive way in which the Council could address this matter. Please can the Council give some further consideration to this important matter.

#### *Policy SP4 – Sustainable Development*

42. The Council agreed during the hearings that they would introduce a MM to delete policy SP4 from the Plan and instead rely on national planning policy to ensure that development in the district is sustainable. This needs to be included in the list of MMs.

#### *Policy SP5 – High-Quality Design*

43. The Council agreed to look at the wording of policy SP5 and whether it should contain a reference to the National Design Guidance. Can the Council please confirm if they have done this and what the outcome was. Any changes will need to be set out as a MM.

#### *Policy SP6 – Health and Wellbeing*

44. A discussion took place at the hearings regarding criterion 5a. of this policy and whether it should refer to ‘improved’ health facilities and criterion 10 and its requirement for a Health Impact Assessment for all major development proposals. The Council agreed to give the wording in these 2 criteria further consideration. Can you please confirm the outcome of this and whether any MMs are being advanced as a result.

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<sup>3</sup> Paragraph: 006 Reference ID: 63-006-20190626

### *Policy SP10 – Managing Development in the Countryside*

45. It was agreed during the hearings that this policy wording needs to clarify that it does not apply to sites in the countryside that are allocated for development in this Plan or any other adopted development plan. This revised policy wording will need to be set out in as a MM.

### *Policy SP12 Shropshire Economic Growth Strategy*

46. We do have some concerns about the effectiveness of this policy as a great deal of it seems to be more of a vision rather than a strategic policy. Can the Council please review this policy in the context of the advice in relation to strategic policies set out in paragraphs 20 to 23 of the Framework. Proposed changes will need to be set out as MMs.

### *Policy SP13 – Delivering Sustainable Economic Growth and Enterprise*

47. It was agreed at the hearings that the text box 'Figure SP13.1', should be incorporated into policy SP13. This will need to be included as a MM.

### *Strategic Settlements and Sites*

48. We have set out our concerns above regarding the removal of the RAF Cosford site from the Green Belt. We have no further comments to make on policy S21 or policy S20 which relate to the former Ironbridge Power Station site.
49. Turning to Tern Hill and policy S19, we have concerns about the deliverability of the affordable housing that would be required in connection with the development of this proposed site allocation given the evidence set out in the Council's Viability Study 2020 (EV115.01) and the fact that the trajectory shows that 400 of the 750 proposed dwellings will be delivered after the Plan period.
50. This also leads us to find that there is a lack of evidence to demonstrate that this proposed allocation will be capable of supporting the necessary infrastructure and services planned. Given the site's location away from any main settlements, it is important that it contains a range of services to limit trips by private car. Therefore, we require evidence which demonstrates that the appropriate necessary infrastructure would be delivered at the appropriate stages in the delivery of this site to serve its occupants.
51. Finally, as discussed in detail at the relevant hearing session we have some concerns about the vagueness of some of the policy wording in policy S19. The Council agreed it would look at this with a view to improving its precision and certainty for the benefit of developers and local residents. These changes should be advanced as MMs.

### *Strategic Flood Risk Assessment*

52. The issue of whether the Council's Strategic Flood Risk Assessment (SFRA) was up to date in terms of hydraulic modelling and fluvial flood risk was raised at the relevant hearing session. It was agreed that the Council would provide a note of clarification regarding the methodology and data relied upon and whether any updating is necessary. Also, the Council should review whether the SoCG with the Environment Agency needs to be updated in view of this.

### *Local Development Scheme*

53. During the matter 1 hearing session the out of datedness of the Local Development Scheme (LDS) and the reasons for that were discussed. We would be obliged if the Council would keep the LDS under review and arrange an update. A note to this effect should be placed on the Council's examination website to inform web users of this.

### *Overall Conclusions*

54. For the reasons set out above, as things stand, the development strategy set out in the Plan is unsound and further work and main modifications will be required to progress the examination. We appreciate that there is a lot in our letter for the Council to consider. Therefore, we have not set a deadline for a response. However, it would be helpful if you could provide an indicative timescale for a response. When you respond in full to our letter can you please also provide a timetable for the additional work that is required for soundness.
55. Once we have a timescale for any additional work, we can then agree some provisional dates for the stage 2 hearings. At these hearings it is likely we will first need to re-consider some of the stage 1 matters as then the development management policies in the plan and the site allocations.
56. The Council and participants should be aware that the above comments do not represent our full findings on these matters, which shall be set out in our final report having considered any representations made in response to further public consultation and/or further hearing sessions which may be required in due course.
57. We are not inviting comments to this letter from representors, they will be given an opportunity to comment on the above matters in due course, either through representations to consultation organised by the Council, through hearing statements, appearing at hearing sessions or through the opportunity to comment on MMs.
58. Should the Council require any further clarification on any of the above matters you can contact us through the Programme Officer.

*Louise Crosby, Carole Dillon and Nick Palmer*

Examining Inspectors

## **APPENDIX 2:**

## **APPENDIX 3:**

**Inspectors:**

Louise Crosby MA MRTPI,  
Carole Dillon BA (Hons) MRTPI and  
Nick Palmer BA (Hons) BPI MRTPI

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Date: July 2023

Dear Inspectors,

## Shropshire Council Response to ID28: Inspectors' Interim Findings Following Stage 1 Hearings Sessions

### 1. Introduction

- 1.1. Thank you for your correspondence of the 15<sup>th</sup> February 2023 (ID28) in which you set out your Interim Findings on the Stage 1 Hearing Sessions. Within ID28, you posed a series of questions to the Council and identified areas of further work for the Council to undertake before you proceed with the Stage 2 Hearing Sessions.
- 1.2. Within ID28, you also indicated that your questions and identified further areas of work may result in the identification of additional potential Main Modifications to support the soundness of the draft Shropshire Local Plan.
- 1.3. In our initial response (GC20), the Council indicated our intention to respond to ID28 by the 30<sup>th</sup> June 2023. However, as we subsequently advised, in order to allow for approval of this response by Shropshire Council's Cabinet, these timescales have been subject to a short extension. The Council very much appreciate your understanding on this matter.



- 1.4. We have now taken the opportunity to reflect on ID28 and in particular the conclusions you had reached, the questions you raised and the further areas of work identified.
- 1.5. Our initial response (GC20), this correspondence, and the accompanying documents represent our full response to ID28.
- 1.6. Between the issuing of ID28 and this response, a further hearing occurred regarding minerals and waste. Following the completion of this hearing the Council provided a schedule of proposed main modifications resulting from this hearing. You have subsequently issued a response (with correspondence reference ID34) requesting that the Council give due consideration to the need for main modifications to address a limited number of very specific issues.
- 1.7. The Council has reflected upon these suggestions and is supportive of the identification of proposed main modifications on all the issues identified. As such, a series of proposed main modifications have been prepared.
- 1.8. The documents which accompany this response include an Updated Schedule of Main Modifications and an Updated Schedule of Minor (Additional) Modifications.
- 1.9. These Schedules have been comprehensively reviewed and updated so that they capture all proposed modifications to date. This includes those proposed in response to ID28, those resulting from the recent hearing session on minerals and waste, and those proposed in response to mineral and waste correspondence ID34.
- 1.10. To aid with the consideration of proposed modifications, they have been re-referenced and re-ordered so that they reflect the structure of the draft Shropshire Local Plan.



- 1.11. For convenience, the Council has also prepared a 'track changes' version of the draft Shropshire Local Plan, which captures all of the proposed Main and Minor (Additional) Modifications to the draft Local Plan to this point in the examination.
- 1.12. *Please Note: The Updated Schedules of Main Modifications and Minor (Additional) Modifications utilise policy references as at the submission of the draft Shropshire Local Plan for examination. The 'track changes' version of the draft Shropshire Local Plan includes hyperlinks on policy references to aid navigation, these update to reflect changes resulting from proposed modifications.*
- 1.13. For ease, the Council has structured the remainder of this response to follow the order of ID28 and where appropriate we cross-refer to relevant paragraphs of ID28.

## **2. Duty to Cooperate (DtC)**

- 2.1. Paragraphs 2-3 of ID28 address compliance with the Duty to Cooperate (DtC). Shropshire Council acknowledges and welcomes the conclusions about our engagement with our duty to cooperate partners, as recorded within these paragraphs of ID28.

## **3. Next Steps**

- 3.1. Paragraph 4 of ID28 addresses next steps. This correspondence and the accompanying documents are intended to provide the information necessary to allow the examination of the draft Shropshire Local Plan to proceed to the Stage 2 Hearing Sessions.



## 4. Plan Period

- 4.1. Paragraph 5 of ID28 addresses the plan period for the draft Shropshire Local Plan. It identifies two questions for the Council:
- a. Whether the start of the plan period (currently proposed to be 2016) should align with the base date for the Local Housing Needs Assessment (which is 2020) submitted as part of the evidence base that informed the preparation of the draft Shropshire Local Plan?
  - b. What are the implications of aligning these two dates, including in relation to the Housing Requirement in draft Policy SP2 and the settlement guidelines / supply of sites in Policies S1-S20?
- 4.2. Shropshire Council has considered these questions and addresses each in turn.

### ***a. Should the start of the plan period be aligned with the base date for the Local Housing Needs Assessment?***

- 4.3. The Council acknowledges there may be advantages to aligning the start of the plan period with the base date for the Local Housing Needs Assessment. However, the Council considers that these advantages would be outweighed by the disadvantages and it is also considered unnecessary to change the plan period to ensure the plan is 'sound'.
- 4.4. The disadvantages resulting from such a change to the plan period, include:
- a. Consultations and discussions with communities undertaken during the preparation of the draft Shropshire Local Plan were predicated on a 2016 start date for the plan period. Changing this date now may cause unnecessary confusion.
  - b. Evidence base prepared to inform the draft Shropshire Local Plan is predicated on a 2016 start date for the plan period. Whilst a change



would not invalidate the evidence, it could again cause some unnecessary confusion.

- c. Change would have 'knock-on' implications for settlement housing and employment land guidelines (see below) which could also cause unnecessary confusion.
- d. It could lead to further debate over whether the start of the plan period should be updated again as the examination process continues. This may cause unnecessary delay and confusion.

4.5. Shropshire Council is concerned that unnecessary confusion has the potential to undermine implementation of the draft Shropshire Local Plan.

***b. What are the implications of aligning these two dates?***

4.6. If the start of the plan period is aligned with the base date for the Local Housing Needs Assessment, the housing and employment land requirements within draft Policy SP2 would need to be reduced to exclude the housing and employment land completed prior to 2020.

4.7. This is because these proposed requirements were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared. The consultation material produced to inform preparation of the draft Shropshire Local Plan documents this.

4.8. Similarly, the housing and employment land guidelines for all settlements within draft Policies S1-S20 would need to be amended to exclude the housing and employment land completed prior to 2020.

4.9. This is again because these proposed guidelines were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared and this



formed the basis for discussions with communities. Again, documented within the consultation material produced to inform preparation of the draft Shropshire Local Plan.

- 4.10. As such, a range of Main Modifications would be required to the draft Shropshire Local Plan in order to reflect this change. This would include:
  - a. The introduction to the draft Shropshire Local Plan.
  - b. Draft policies, including SP2, SP7, SP13, DP1, DP2, DP3, DP30 and S1-S20.
  - c. The explanation to a number of draft Policies, including those referenced above.
  - d. Appendices 5 and 6 of the draft Shropshire Local Plan.
- 4.11. Again, it could also lead to further debate over whether the start of the plan period should be updated again as the examination process continues.
- 4.12. As such, upon reflection Shropshire Council's clear preference is for the start of the Plan period to remain 2016, unless you consider that a change to 2020 is required to ensure the draft Shropshire Local Plan is 'sound'.

## 5. Saved Policies

- 5.1. Paragraph 6 of ID28 addresses the means by which relevant policies within the SAMDev Plan would be 'saved'. It requested that the Council provide further information on how this is intended to be achieved.
- 5.2. Within Appendix 1 of GC20 three initial mechanisms were identified to 'save' the relevant policies within the SAMDev Plan – one of which reflected the approach already proposed in the draft Shropshire Local Plan.



- 5.3. Within your response to GC20 (within correspondence referenced as ID33) you provided the following advice:

*“Turning now to appendix 1 of your letter, Mrs Dillon and I have looked at this and given it a great deal of thought. Our view is that whilst you can retain policies in your existing plan you cannot save parts of them by striking through text as there is no mechanism for this. To do this you would have to replicate all of the amended policies in an appendices to the emerging plan. This would make the emerging plan very long and difficult for future users to navigate. Moreover, these policies as you know are not before this examination.*

*Our advice would be to refer to the policies in appendix 2 of the emerging plan as is the case at present, but then add some wording into emerging Policy SP2 to make it clear that the housing and employment land requirement is made up of sites in the emerging plan and sites in appendix 2. You could also consider adding some wording to the beginning of the Place Plans section of the emerging plan as ‘supplementary text’ in order to provide further context to the policy situation for allocations within the Place Plan areas.”*

- 5.4. Firstly, Shropshire Council would like to thank you for reflecting upon the initial mechanisms identified by the Council and providing your views on this matter.
- 5.5. Having considered ID33, Shropshire Council is in agreement that the proposed approach is both effective and appropriate.
- 5.6. The Council has identified two proposed modifications to implement this proposed approach, which are to:
- a. Include additional text in draft Policy SP2 of the draft Shropshire Local Plan to explain that the housing and employment land requirements will be implemented using a land supply that



comprises sites within the draft Shropshire Local Plan and sites already allocated within the SAMDev Plan, as identified within Appendix 2 of the draft Shropshire Local Plan.

b. Include additional text within the introduction to Section 5 of the draft Shropshire Local Plan explaining that 'saved' allocations and new allocations will contribute towards the achievement of the housing and employment land guidelines for settlements. Thereby providing further context to the settlement policies across the 18 Place Plan areas.

5.7. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.

5.8. Shropshire Council considers that these proposed modifications provide greater clarity about the sites that contribute to the achievement of the proposed housing and employment land requirements within the draft Shropshire Local Plan.

5.9. Shropshire Council also considers that these modifications complement:

a. The existing references to sites already allocated within the SAMDev Plan (as identified within Appendix 2 of the draft Shropshire Local Plan), in both the explanation to draft Policy SP2 and in the draft settlement policies (S1-S18).

b. The previously proposed modification to Appendix 2 of the draft Shropshire Local Plan to update the list of proposed 'saved' site allocations to exclude sites that have been built out since 31<sup>st</sup> March 2019 and include the development guidelines and approximate provision figures from the SAMDev Plan for each 'saved' allocation (the location and extent of these 'saved' allocations are already illustrated on the draft Policies Map).



## 6. Gypsy and Traveller Transit Site Provision

- 6.1. Paragraphs 7-9 of ID28 address Gypsy and Traveller transit site provision. They include the following questions:
- a. Can the Council provide copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site on the examination webpage?
  - b. Can the Council update 'Table 7.9', the conclusion, and the executive summary of the Gypsy and Traveller Accommodation Assessment (GTAA) 2019 Update, as an addendum to this document?
  - c. Can the Council review the supporting text within the draft Shropshire Local Plan in response to the addendum to the GTAA 2019 Update?
  - d. Can the Council consider whether they wish to review the Gypsy and Traveller site needs within the GTAA 2019 Update in the light of the judgment *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022?
- 6.2. Shropshire Council has considered these questions and addresses each in turn.

### ***a. Copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site***

- 6.3. Shropshire Council can confirm that copies of the Cabinet Report and Cabinet Minutes regarding the proposed Gypsy and Traveller transit site to the north of Shrewsbury have been provided to the Programme Officer and have subsequently been made available on the examination webpage as an Examination Stage Document (reference GC21).



6.4. For information, a Planning Application (reference 23/00567/FUL) was submitted for the provision of this new transit site. This was subsequently withdrawn to allow the preparation of further additional technical assessments. It is anticipated that a new Planning Application for this proposal will be submitted shortly.

***b. Prepare an Addendum to the GTAA 2019 Update***

6.5. Shropshire Council has undertaken a review of Table 7.9, the conclusion, and the executive summary of the GTAA 2019 Update. This was informed by professional advice provided by our consultants Arc4.

6.6. Following this review an addendum to the GTAA 2019 Update has been prepared. This addendum has been provided alongside this correspondence to be made available on the examination webpage.

***c. Review of supporting text within the draft Shropshire Local Plan***

6.7. Following preparation of the addendum referenced above, Shropshire Council has undertaken a review of the supporting text within the draft Shropshire Local Plan.

6.8. As a result of this review, a number of main modifications are proposed to the explanation of draft Policy DP8, to reflect the additional information set out in the GTAA 2019 addendum. These proposed main modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.

***d. Implications of the judgment Lisa Smith v SSLUHC [2022] EWCA Civ 1391 of 31st October 2022***

6.9. Shropshire Council recognises the Court of Appeal's judgment in Lisa Smith v SSLUHC [2022] EWCA Civ 1391 of 31st October 2022 about the



interpretation and application of the Planning Policy for Traveller Sites (2015) (PPTS).

- 6.10. Having reviewed it and considered the implications of this case for the Council's published evidence (including the GTAA 2019 Update), the Council considers that it would not change the Council's approach to assessing the accommodation needs of Gypsies and Travellers for the purposes of the Local Plan review.
- 6.11. The Shropshire GTAA 2019 Update assesses the accommodation needs of all Gypsies and Travellers, with those relating to Travellers meeting the Annex A definition in the PPTS identified as a proportion of the total identified cultural need. Thus, the housing needs of all ethnic Gypsies and Travellers are assessed, including those that may be deemed to have permanently ceased to travel and fall outside the definition of Gypsies and Travellers in the PPTS.
- 6.12. This is succinctly documented within the explanation to draft Policy DP8 of the draft Shropshire Local Plan, which includes a brief summary of the GTAA 2019 Update. This notes that it *"includes ethnic gypsies and travellers who fall outside the definition of Travellers in the PPTS who nonetheless are able to demonstrate a right to culturally appropriate accommodation."*
- 6.13. As such, it is not considered that the GTAA 2019 Update needs to be reviewed in the light of the judgment in *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022. However, the Council has separately addressed the required update of the GTAA requested in relation to Paragraph 8 of ID28.
- 6.14. The Council understands that it has a requirement to assess and meet the accommodation needs of all Gypsy and Travellers, irrespective of their travelling status. The conclusions of the GTAA 2019 Update confirm that all cultural need has been assessed and that for the



purposes of the Local Plan Review, it is expected that supply will be sufficient to meet this need.

- 6.15. Thus, the proposed approach to meeting the housing needs of Gypsies and Travellers within the draft Shropshire Local Plan will meet both the needs of those that comply with the definition of Gypsies and Travellers in the PPTS; and the needs of ethnic Gypsies and Travellers that fall outside the definition of Gypsies and Travellers in the PPTS, who nonetheless can demonstrate a right to culturally appropriate accommodation.

## **7. Unmet Housing and Employment Land Needs of the Association of Black Country Authorities (ABCA) and Policy SP2**

- 7.1. Paragraphs 10-27 of ID28 address a range of issues related to housing and employment land.

### ***Housing and Employment Topic Paper***

- 7.2. Paragraphs 10-12 of ID28 address housing and employment land needs and requirements and culminate in a request for a Housing and Employment Topic Paper to address these matters.
- 7.3. Paragraph 22 of ID28 relates to the proposed strategy for achieving the housing and employment land requirement. It culminates in a request for the new Housing and Employment Topic Paper to document the proposed strategy.
- 7.4. Shropshire Council has sought to positively respond to these requests and has prepared a new Housing and Employment Topic Paper. This seeks to explain the Council's position with regard to housing and employment land needs and requirements, including the proposed



strategy for the distribution of development to achieve these proposed requirements.

7.5. For the avoidance of doubt, the content of this new Housing and Employment Topic Paper has been directly informed by the wider work undertaken in response to ID28 (particularly the additional Sustainability Appraisal and site assessment work undertaken in responses to paragraphs 17-21 of ID28). The Housing and Employment Topic Paper is enclosed with this response.

7.6. In summary, with regard to the housing and employment land requirements and the approach to the strategic distribution of planned development, the Housing and Employment Topic Paper concludes that:

- a. *Over the proposed plan period from 2016 to 2038, **a minimum of 30,800 new dwellings and a minimum of 300 hectares of employment land will be delivered**, of which 1,500 dwellings and 30ha of employment land are to contribute towards the unmet needs forecast to arise within the Black Country. The proposed housing and employment land requirements equate to around 1,400 dwellings and around 14ha of employment land per annum.*
- b. *To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, **new development will be focused in the 'urban areas'**, which consist of Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements.*
- c. *Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in 'urban areas' will be **complemented by appropriate new development** within Community Hubs, which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or*



*enhance their sustainability. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.*

- 7.7. This therefore forms the basis for the proposed spatial strategy for the level and distribution of development across Shropshire.

### ***Housing and Employment Land Need and Proposed Contributions to the Black Country***

- 7.8. Paragraph 13 of ID28 specifies that *“The Council’s approach to identifying the housing and employment land needs derived within Shropshire itself is sound.”* It also specifies that *“In principle, the Council’s intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC.”* These conclusions are welcome.
- 7.9. Paragraphs 14-16 continue discussion of the unmet needs forecast to arise within the Black Country and conclude that proposed contributions are *“the starting point as there is agreement to revisit the unmet need with a view to providing further assistance once the local plans for the ABCA councils have been examined and adopted.”*
- 7.10. Shropshire Council acknowledges this conclusion and is committed to continued positive engagement through the duty to cooperate with the Black Country Authorities.

### ***Further Sustainability Appraisal (SA) Assessment Work***

- 7.11. Paragraphs 17-20 continue to address the proposed contribution to unmet needs forecast to arise within the Black Country, in the context of Sustainability Appraisal (SA). They raise concern about the



consideration of proposed contributions to the unmet needs forecast to arise within the Black Country when undertaking SA assessments.

7.12. Paragraph 20 concludes that *“Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country.”*

7.13. As such, Shropshire Council has undertaken further Sustainability Appraisal (SA) assessment work regarding the proposed housing and employment land requirements, including consideration of a range of reasonable options for each.

7.14. Consistent with ID28, within the additional SA assessment work an explicit distinction is made between Shropshire need and the proposed contribution to unmet needs forecast to arise within the Black Country.

7.15. The conclusions of this additional SA assessment work have been carefully considered and have informed proposals regarding the housing and employment land requirements for inclusion within the draft Shropshire Local Plan. These proposals and the relationship to need is documented within the new Housing and Employment Topic Paper.

### ***Black Country Contribution***

7.16. Paragraph 21 of ID28 explains that if the Council intend to contribute towards the unmet needs forecast to arise within the Black Country, for effectiveness this should be set out in the housing and employment land requirements of the draft Shropshire Local Plan.

7.17. As documented within the further SA assessment work and new Housing and Employment Topic Paper, Shropshire Council continues to consider that the proposed contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise within the



Black Country are appropriate and should be included within the draft Shropshire Local Plan.

- 7.18. The draft Shropshire Local Plan includes explicit reference to these proposed contributions within the explanation to draft Policy SP2. However, in seeking to positively respond to ID28, a main modification is proposed to specify that these contributions constitute part of the proposed housing and employment land requirements within draft Policy SP2 itself.

***Sites to Accommodate Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country***

- 7.19. Paragraph 21 of ID28 also specifies that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work.
- 7.20. Specifically, it states *"...the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan."*
- 7.21. To ensure the effectiveness of the draft Shropshire Local Plan, Shropshire Council has undertaken additional SA and site assessment work to inform the identification of the site or sites to accommodate the proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country.
- 7.22. This scope and conclusions of this assessment work are explained within the enclosed additional SA and site assessment work.
- 7.23. In conclusion, a series of sites have been identified to accommodate the proposed contributions of 1,500 dwellings and 30ha of employment land towards unmet needs forecast to arise within the Black Country. These



sites and a brief summary of the reasons for their identification are documented within Table 7.1.

7.24. The additional SA assessment work also considered the sustainability of the proposed contributions and approach / sites to accommodate contributions to unmet needs forecast to arise within the Black Country through the updated SA assessment of draft Policy SP2. Reflecting the outcome of this work, a series of proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications.



**Table 7.1: Sites Identified to Accommodate the Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country**

Site Reference	Site Name	Specific Policy	Total Capacity	Black Country Contribution	Summary
BRD030	Tasley Garden Village, Bridgnorth	S3.1	1,050 dwellings 16ha employment land New local centre 20ha of green infrastructure and a 19ha linear park	600 dwellings	<p>Bridgnorth is located in south-east Shropshire with a functional relationship to the Black Country. It benefits from strong road links to the Black Country via the A454 corridor.</p> <p>Bridgnorth is a principal centre and performs a strategic role in the east of Shropshire.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>
SHF018b & SHF018d	Land east of Shifnal Industrial Estate, Upton Lane, Shifnal	S15.1	39 hectares (15.6ha net development)	30ha of employment land	<p>Shifnal is located in east Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 corridor and Shrewsbury-Wolverhampton railway line.</p> <p>Shifnal is a key centre and a focus for investment, employment, housing and development on the M54/A5 strategic corridor.</p> <p>The site constitutes a proposed strategic employment allocation which due to its size and location has the potential to form both a local and regionally important employment centre.</p> <p>The site can accommodate a sizeable contribution towards the unmet employment land needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints. Whilst the site is located within the Green Belt, it is considered that exceptional circumstances exist to justify the release of this land for employment, as documented within the new Green Belt Topic Paper.</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>

Site Reference	Site Name	Specific Policy	Total Capacity	Black Country Contribution	Summary
SHR060, SHR158 & SHR161	Land between Mytton Oak Road and Hanwood Road, Shrewsbury	S16.1	1,500 dwellings 5ha of employment land	300 dwellings	<p>Shrewsbury is located in central Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 / A5 corridor and Shrewsbury-Wolverhampton railway line. Shrewsbury is the strategic centre of Shropshire and the primary focus for new development in the County.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>
IRN001	Former Ironbridge Power Station	S20	Range of local services and facilities Around 1,000 dwellings Around 6ha of employment land Extensive green infrastructure	600 dwellings	<p>The Former Ironbridge Power Station is located in east Shropshire with a functional relationship to the Black Country. It benefits from road access to the M54 / A5 corridor link to the Black Country via either the A4169 / A5523 or A4169 / A442.</p> <p>The Former Ironbridge Power Station is a part brownfield site that benefits from Outline Planning Permission and will form a new strategic settlement, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p>

## ***Green Belt Topic Paper***

- 7.25. Paragraph 23 of ID28 addresses the role of proposed Green Belt releases in supporting the housing and employment land supply to meet Shropshire needs and proposed contributions to unmet needs forecast to arise within the Black Country.
- 7.26. It culminates in a request for an updated Green Belt Topic Paper, setting out exceptional circumstances for releasing Green Belt land to meet the needs of Shropshire and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.
- 7.27. In seeking to positively respond to this request, Shropshire Council has prepared an additional Green Belt Topic Paper.
- 7.28. However, it is important to note that a comprehensive Green Belt Exceptional Circumstances Statement (EV051) has already been prepared. Furthermore, a previous Green Belt Topic Paper (GC4g) was also prepared to provide a strategic overview of the role and purpose of proposed Green Belt releases.
- 7.29. Additionally, as documented within Table 7.1, through the additional SA and site assessment work four sites have been identified to accommodate the proposed contribution to the unmet needs of the Black Country. Of these, only one: SHF018b & SHF018d is located within the Green Belt – with the intention that it accommodates 30ha of employment land towards the unmet employment land needs forecast to arise within the Black Country.
- 7.30. As such, the new Green Belt Topic Paper seeks to:
- a. Provide a summary of the purpose of each of the proposed releases of land from the Green Belt to meet current or future needs arising



within Shropshire. This is supported by appropriate cross-references to other relevant material where appropriate.

- b. Provide a more detailed explanation of the purpose and exceptional circumstances for the proposed release of land from the Green Belt to accommodate a proposed contribution to the unmet needs forecast to arise within the Black Country.

### ***Need for Consultation***

- 7.31. Paragraph 24 of ID28 explains that it is necessary to address the issues raised in paragraphs 10-23 of ID28 in order for the plan to be found sound. Shropshire Council recognises this conclusion and within this response and the accompanying material has sought to positively respond to the conclusions reached.
- 7.32. Paragraph 24 indicates that following the submission of the full response to ID28, you will determine whether there is a need for further public consultation. Shropshire Council appreciates your consideration of this matter and will of course positively respond to your conclusions.

### ***Local Plan Review Mechanism***

- 7.33. Paragraph 25 of ID28 addresses the Local Plan review process. It states that such a review *“could be dealt with by way of an early review trigger built into policy SP2 or by relying on the statutory 5-year review process set out in the Framework”* and requests that the Council provide its formal views on these alternatives.
- 7.34. Shropshire Council very strongly favours the use of the statutory 5-year review process set out in the National Planning Policy Framework (NPPF).



- 7.35. There are a number of factors which inform this position. In summary, the statutory 5 year review process:
- a. Is the mechanism that Government has introduced for reviewing Local Plans.
  - b. Is a cycle with which many within the industry and Shropshire's communities are familiar.
  - c. Provides much needed stability and certainty regarding the policy framework in an area for individuals, communities, developers and decision makers. One of the issues with other mechanisms is the considerable uncertainty about whether / when a review will be 'triggered'.
  - d. Provides a better opportunity to focus on post adoption implementation and delivery. This implementation process is crucial, as without it the value of the Local Plan is diminished.
  - e. Is appropriately aligned with the timescales for the preparation of the Local Plans within the Black Country Authorities in order to support ongoing cross boundary discussions.

### ***Monitoring Indicators***

- 7.36. Paragraph 26 of ID28 addresses monitoring indicators and concludes that there is a need for indicators associated with the delivery of the proposed contributions to the unmet needs forecast to arise within the Black Country.
- 7.37. Shropshire Council has identified proposed modifications which seek to respond to this conclusion, which are documented within the enclosed Updated Schedule of Proposed Main Modifications.



## ***Main Modifications***

- 7.38. Paragraph 27 of ID28 explains that any main modifications resulting from the issues addressed within Paragraphs 10-26 of ID28 need to be appropriately documented and submitted to the examination.
- 7.39. Shropshire Council has identified a series of proposed modifications informed by the additional work undertaken in response to Paragraphs 10-26 of ID28. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications and Updated Schedule of Proposed Minor (Additional) Modifications.

## **8. Habitat Regulations Assessment**

- 8.1. Paragraph 28 of ID28 addresses the Habitat Regulations Assessment (HRA) of the draft Shropshire Local Plan, specifically with regard to the Clun catchment.
- 8.2. It requests that Shropshire Council engages with Natural England and the Environment Agency regarding the Written Ministerial Statement (WMS) entitled 'Statement on improving water quality and tackling nutrient pollution', with a view to updating the prepared Statements of Common Ground (SoCG).
- 8.3. It also asks that following this engagement, the Council should advise on the implications for the latest position in the draft Shropshire Local Plan and whether any outstanding issues might be addressed through further proposed Main Modifications.
- 8.4. Proactive engagement between Shropshire Council and Natural England is currently ongoing with regard to this matter. The Council will provide further updates on this matter in due course.



## 9. Green Belt – RAF Cosford

9.1. Paragraphs 29-32 of ID28 address RAF Cosford. They explain that you have concluded that RAF Cosford should remain in the Green Belt, because:

- a. There is *“no evidence before us to demonstrate that the site’s Green Belt status has in anyway prevented it being developed in a manner consistent with its use as an RAF base or indeed related activities such as training facilities and domestic accommodation”*.
- b. *“Paragraph 143(b) of the Framework which advises that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open. However, it seems that the site has large areas of undeveloped land which, if developed, could harm openness of the surrounding Green Belt land.”*
- c. *“It would also make it more difficult for the Council to control future non-military related development on the site as other general development management policies would apply.”*

9.2. Whilst of course disappointed, Shropshire Council accepts the reasoning and conclusions in your Interim Findings. As such, appropriate main modifications are proposed. In summary these proposed modifications involve:

- a. The deletion of draft Policy S21 and its explanation.
- b. Appropriate amendments to draft Policies SP11 and S1 and their explanations.
- c. Other necessary amendments for the purpose of consistency.

9.3. Given the extensive built form that exists on the RAF Cosford site and the fact that there are known development aspirations / opportunities, Shropshire Council considers it is important to recognise within the

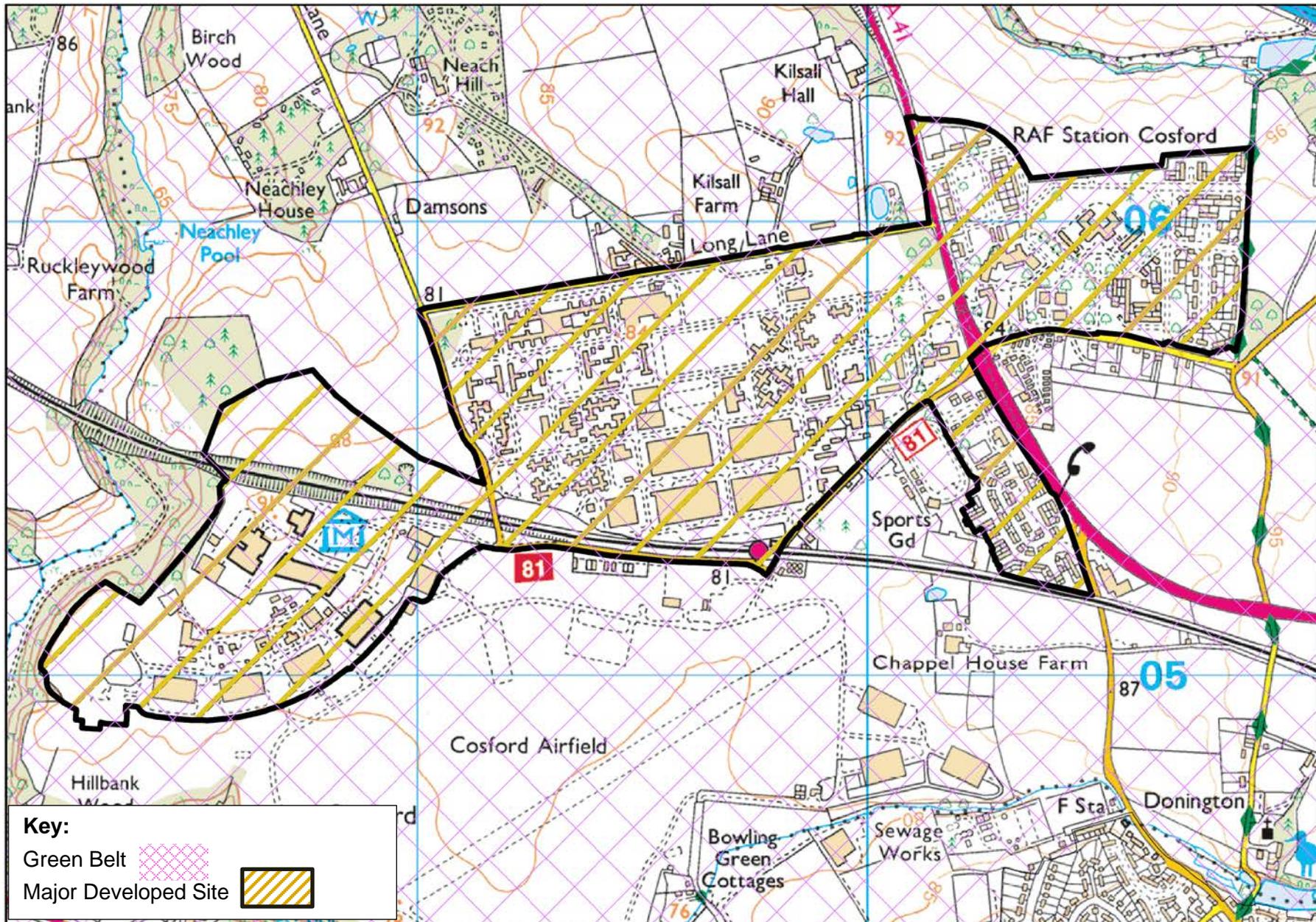


draft Shropshire Local Plan that RAF Cosford is a major developed predominantly brownfield site located within the Green Belt.

- 9.4. It is also important to recognise that this is a consideration when determining whether very special circumstances exist for development within the Green Belt - this position is consistent with that within the adopted Local Plan and is responsive to the conclusions you have reached within your Interim Findings.
- 9.5. As such, it is proposed that this is reflected within the modifications to draft policies SP11 and S1.
- 9.6. These proposed modifications are documented within the enclosed Updated Schedule of Proposed Main Modifications and Updated Schedule of Proposed Minor (Additional) Modifications.
- 9.7. Modifications will also be required to the draft Policies Map to remove reference to the RAF Cosford Strategic Site and include reference to the RAF Cosford Major Developed Site, this will be undertaken in due course.
- 9.8. For information, the proposed extent of the major developed predominantly brownfield component of the RAF Cosford site, which it is proposed will be reflected on the Policies Map, is identified in Figure 9.1.



Figure 9.1: Extent of the Proposed RAF Cosford Major Developed Site



## 10. Infrastructure Delivery Plan (IDP) and Strategic Funding Statement (SFS)

- 10.1. Paragraphs 33-34 of ID28 address infrastructure.
- 10.2. Paragraph 33 of ID28 advises the Council to treat the Infrastructure Delivery Plan (known in Shropshire as the Strategic Infrastructure and Investment Plan (GC4t)) as a 'live document' and to continue populating it as further information becomes available.
- 10.3. Shropshire Council recognises the importance of having a robust understanding of the infrastructure required to support development proposals within the draft Shropshire Local Plan. However, the strategic nature of the Local Plan can mean providing detailed assessments will be challenging.
- 10.4. However, Shropshire Council very much recognises the importance of continuing to enhance its understanding of infrastructure requirements across Shropshire, and in particular the infrastructure required to support the development proposals within the draft Shropshire Local Plan.
- 10.5. The Council therefore welcomes the recommendation and strongly embraces the principle of the Strategic Infrastructure and Investment Plan (GC4t) being viewed as a 'live document' that should be continued to be populated as further information becomes available.
- 10.6. Indeed, as documented within the Strategic Infrastructure and Investment Plan (GC4t) itself *"It is important that this Strategic Infrastructure and Investment Plan provides a 'live' framework, enabling the alignment of future planning, prioritisation, and delivery. It can only provide a snapshot in time using the best available data and assumptions from Shropshire's strategic providers. The Plan will be subject to an annual review and agreement via Shropshire's Strategic*



*Infrastructure and Investment Network and informed with local intelligence via the annual Place Plan review.”*

- 10.7. Shropshire Council would note that reflecting the 'live' nature of infrastructure planning in Shropshire, a comprehensive update of the Place Plans (EV067.01-EV067.18) that identify infrastructure needs and priorities is currently ongoing.
- 10.8. Further information regarding the infrastructure needed to support new development and the infrastructure priorities and investment strategies of the main infrastructure providers in Shropshire are also currently being sought through productive discussions with site promoters and the Strategic Infrastructure and Investment Network. This Network includes representatives from several partner organisations, including the NHS, National Highways, Utility Providers and Network Rail, as well as ongoing contributions from the Council's own Education service in assessing school place planning requirements in response to planned development.
- 10.9. This work will in sequence inform future updates of the Strategic Infrastructure and Investment Plan (GC4t).
- 10.10. Paragraph 34 of ID28 requests timescales for the update of the Strategic Funding Statement, known as the Annual Infrastructure Funding Statement in Shropshire.
- 10.11. Shropshire Council can confirm the Annual Infrastructure Funding Statement for Shropshire was last updated for the period 01/04/2021 - 31/03/2022. This was published in December 2022 and a copy is enclosed with this response.
- 10.12. The Annual Infrastructure Funding Statement (2022) presents an infrastructure list (see pages 9-21) which *“sets out the potential infrastructure projects or types of infrastructure which Shropshire*



*Council intends to be wholly or partly funded by the Community Infrastructure Levy (CIL)."*

10.13. It should be noted that this list is subject to a number of caveats, including:

*"This report will not dictate how Shropshire Council must spend CIL, but will set out Shropshire Council's intentions."*

*"The intention is for the infrastructure list to be reviewed regularly. Future iterations of the list will include additional infrastructure projects where they are considered necessary to support new development."*

*"items not included on this infrastructure list can continue to be CIL funded in advance of being included in any future infrastructure list."*

*"The list refers only to the use of the CIL local and strategic funds by Shropshire Council."* As such, it does not include use of the CIL 'neighbourhood fund' which is distributed to Town and Parish Councils.

10.14. The content of the Infrastructure List within the Annual Infrastructure Funding Statement is directly linked to and informed by the Place Plans and Strategic Infrastructure and Investment Plan.

10.15. Shropshire Council envisages that the number of projects and level of specificity within the Annual Infrastructure Funding Statement will increase on completion of the Place Plan updates and the ongoing discussions within the Strategic Infrastructure and Investment Network.

## **11. Five-year Housing Land Supply**

11.1. Paragraphs 35-36 of ID28 address the five year housing land supply.

11.2. Paragraph 35 of ID28 explains your finding that you cannot 'fix' the five year housing land supply in Shropshire. This position and your reasoning is acknowledged by Shropshire Council.



- 11.3. Paragraph 36 of ID28 explains your finding that you might not be able to fully consider our 5-year housing land supply and to come to a conclusion on whether the Council do have a 5-year supply of housing land. This is because the Council are relying on a number of 'saved' site allocated in the SAMDev Plan which are not subject to examination.
- 11.4. The Council would note that the process of determining whether a 5-year housing land supply exists during the examination of a draft Local Plan will inevitably involve the consideration of sites that are not proposed for allocation within the draft Local Plan that is the subject of the examination.
- 11.5. This is because a housing land supply invariably extends beyond sites that are proposed for allocation within a draft Local Plan.
- 11.6. For instance, as summarised within Paragraph 3.8 of the explanation to draft Policy SP2 of the draft Shropshire Local Plan: *"The types of site available to achieve the housing requirement in Shropshire are varied and extensive. They include small, medium and large:*
- a. Sites with planning permission or prior approval;*
  - b. Sites with a 'resolution to grant' planning permission;*
  - c. Saved SAMDev Plan allocations;*
  - d. Local Plan allocations; and*
  - e. Windfall opportunities, where sites comply with the requirements of this Local Plan."*
- 11.7. These sources of housing land supply extend beyond those that are specifically allocated within the draft Shropshire Local Plan. They also extend beyond the proposed 'saved' allocations within the adopted Local Plan.



11.8. This is not considered to be unique to Shropshire or indeed in any way unusual. Ultimately the Council remain keen for the examination to consider the housing land supply identified in Shropshire.

11.9. For information, an updated Five Year Housing Land Supply (2022 base date) based on the housing requirement proposed within the draft Shropshire Local Plan, is enclosed with this document.

## **12. Housing Requirement**

12.1. Paragraph 37 of ID28 addresses the housing and employment land requirements. It explains your finding that the housing and employment land requirements should be expressed as definitive 'minimum' figures for both monitoring purposes and for the effectiveness of the plan.

12.2. Whilst the Council is somewhat surprised by this conclusion, it is accepted. A series of proposed modifications have therefore been identified in order to respond to this conclusion.

12.3. This change to expressing both the housing and employment requirements as minimum figures has been a significant consideration when undertaking the additional work regarding the proposed housing and employment land requirements. The Housing and Employment Topic Paper provides more information on this.

## **13. Specialist Housing / Older Persons Housing**

13.1. Paragraphs 38-41 of ID28 address the requirement to meet the housing needs of older people. In summary, these paragraphs recognise that the Council's evidence indicates a higher proportion of older people residing in the Shropshire Council's administrative area than the national average. Given this, you consider there is clear evidence of a higher-than-average need for specialist housing for older people and



that either the policy should include indicative need figures, or the Plan should contain a specific policy to deal with specialist housing.

- 13.2. Shropshire Council has considered this matter and on reflection has prepared a specific policy to address the housing needs of older people and those with disabilities and special needs, to be included within the draft Shropshire Local Plan. The preparation of this draft Policy has been informed by additional SA assessment work and proactive discussions with colleagues in the Housing and Adult Social Care Teams at Shropshire Council.
- 13.3. It is considered that this policy represents an effective means of ensuring that the housing needs of older people are met in a way that is responsive to both the current Adult Social Care Strategy for Shropshire (2018) and the emerging People's Strategy for Shropshire (currently in development). Crucially, it is also responsive to the geography and characteristics of Shropshire.
- 13.4. This draft policy is appended to this document. Appropriate proposed main modification are also identified within the enclosed Updated Schedule of Proposed Main Modifications.
- 13.5. *Please Note: The version of this draft policy integrated into the track changes version of the draft Shropshire Local Plan includes updated policy cross-references resulting from proposed main modifications. The version within the Appendix of this document and the Updated Schedule of Proposed Main Modifications maintains the policy references as at the submission draft of the Shropshire Local Plan.*

## **14. Policy SP4 – Sustainable Development**

- 14.1. Paragraph 42 of ID28 addresses draft Policy SP4. It notes that during the hearings it was agreed that a Main Modification would be introduced



to delete draft Policy SP4 and instead rely on national policy in the context of the presumption in favour of sustainable development.

14.2. Accordingly, Shropshire Council has identified proposed modifications to the Updated Schedule of Proposed Main Modifications, submitted alongside this correspondence.

14.3. The Updated Schedule of Minor (Additional) Modifications includes proposed amendments to policy titles to reflect this deletion, but the numerous cross references are currently documented as a single entry. However, the 'track changes' version of the draft Shropshire Local Plan includes hyperlinks on policy references to aid navigation, these update to reflect the policy references resulting from the proposed modifications to date.

## **15. Policy SP5 – High-Quality Design**

15.1. Paragraph 43 of ID28 addresses draft Policy SP5. It notes that the Council agreed to consider whether a reference should be included to the National Design Guidance within draft Policy SP5. Shropshire Council considers that it would be appropriate to include a reference to the National Design Guidance within draft Policy SP5.

15.2. The Council also recognises the role of Local Design Codes within the National Design Guidance and the important role that such documents will play in ensuring high-quality design in the future. The Council considers that a specific reference to Local Design Codes within draft Policy SP5 would also be appropriate.

15.3. Shropshire Council has therefore identified appropriate proposed modifications within the Updated Schedule of Main Modifications submitted alongside this correspondence.



## 16. Policy SP6 – Health and Wellbeing

16.1. Paragraph 44 of ID28 addresses draft Policy SP6. It recognised that the Council had agreed to consider two matters in Policy SP6 and whether to propose any main modifications to the Policy.

16.2. These are:

- a. Should criterion 5a refer to 'improved' health facilities.
- b. What is the expectation of criterion 10 regarding the need for a Health Impact Assessment for all major development proposals and is this appropriate.

16.3. Shropshire Council has considered these questions and addresses each in turn.

### ***a. Criterion 5***

16.4. Shropshire Council has reviewed criterion 5a of draft Policy SP6. The intention of this paragraph was to support existing and provision of new health facilities to serve an expanding population.

16.5. On reflection, it is considered that including reference to 'improved' health facilities alongside existing references to 'maintenance' and 'delivery' of health facilities provides greater clarity on this matter. As such, Shropshire Council has identified appropriate proposed modification within the Updated Schedule of Main Modifications submitted alongside this correspondence.

### ***b. Criterion 10***

16.6. With regard to the expectations of criterion 10, Shropshire Council has considered three questions:

- a. Is it reasonable to include a policy requirement requiring a Health Impact Assessment (HIA)?



- b. Is the trigger point of 'all major development' being required to undertake a HIA appropriate?
- c. Is the scope of the HIA appropriate – as established within the wider requirements of draft Policy SP6?

16.7. With regard to whether it is reasonable to include a policy requirement to undertake a HIA, The Public Health England Guidance "*Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams*" (October 2020) provides guidance on the use of Health Impact Assessment (HIA) in the planning system.

16.8. It specifies that "*Local authorities are encouraged to adopt policies that require an HIA to be carried out for certain types of developments in their local plan or spatial development processes. Such a requirement may support local health and wellbeing priorities (Annex 2) as well as the local health and wellbeing policy. An HIA policy requirement may also support other health-promoting policies such as those relating to sustainable transport, sport and play, housing, access to healthy and affordable food and green infrastructure.*"

16.9. Furthermore, the National Planning Practice Guidance (NPPG) on Health and Wellbeing (ID53) recognises within paragraph 5 that "*A health impact assessment is a useful tool to use where there are expected to be significant impacts.*"

16.10. As such, it is clear that the principle of requiring a HIA within Local Plan policy is appropriate and consistent with national guidance.

16.11. With specific regard to the 'trigger' for undertaking a HIA, having regard to paragraph 5 of the NPPG (ID53) and the advice provided within the afore-referenced Public Health England Guidance, the trigger in criterion 10 of draft Policy SP6 is also considered to be appropriate.



- 16.12. With regard to the 'scope' of a HIA, having regard to paragraph 5 of the NPPG (ID53), advice provided within the Public Health England Guidance and discussions during the relevant hearing session, it is considered criterion 10 of draft Policy SP6 should be modified to make it clear that the expectation is that major development proposals are required to undertake HIA screening. A full HIA would only be required in circumstances where HIA screening concludes it is necessary.
- 16.13. Shropshire Council has prepared an initial draft template of the HIA screening and associated guidance, which are enclosed with this document.
- 16.14. Reflecting this conclusion, Shropshire Council has identified appropriate proposed modifications to both draft Policy SP6 and its explanation, within the Updated Schedule of Main Modifications submitted alongside this correspondence.

## **17. Policy SP10 – Managing Development in the Countryside**

- 17.1. Paragraph 45 of ID28 addresses draft Policy SP10. Specifically, it addresses the agreed modification to this draft Policy to dis-apply the policy requirements to sites in the countryside that are allocated for development in the draft Shropshire Local Plan or any other adopted Development Plan Document.
- 17.2. Accordingly, Shropshire Council has identified appropriate proposed main modification within the Updated Schedule of Main Modifications submitted alongside this correspondence.



## 18. Policy SP12 Shropshire Economic Growth Strategy

- 18.1. Paragraph 46 of ID28 addresses draft Policy SP12. Within this paragraph you have expressed concern regarding the effectiveness of this draft policy as *“a great deal of it seems to be more of a vision rather than a strategic policy.”*
- 18.2. Shropshire Council has reflected on this concern and proposed a main modification to delete this policy within the Updated Schedule of Main Modifications submitted alongside this correspondence.
- 18.3. Shropshire Council will regard the Shropshire Economic Growth Strategy as a material consideration in future planning decisions following the deletion of draft Policy SP12.

## 19. Policy SP13 – Delivering Sustainable Economic Growth and Enterprise

- 19.1. Paragraph 47 of ID28 addresses draft Policy SP13, documenting the agreement to integrate Figure SP13.1 into draft Policy SP13.
- 19.2. Shropshire Council has identified appropriate proposed main modifications within the Updated Schedule of Main Modifications submitted alongside this correspondence.
- 19.3. These proposed main modifications further introduce Figure SP13.1 as a new criterion 8 in Policy SP13. This provides a ‘quality ranking’ of sites within the employment land supply.
- 19.4. The proposed main modifications also include further guidance within the explanation to Policy SP13 on the implications of this ‘quality ranking’ of sites for the implementation of the policy and also that this ‘quality ranking’ of sites will be further explained and monitored annually in the Authority Monitoring Report (AMR).



## 20. Strategic Settlements and Sites

- 20.1. Paragraphs 48-51 of ID28 address the proposed Strategic Settlements and Strategic Site.
- 20.2. Paragraph 48 confirms that there are no specific comments on draft Policy S20 (Former Ironbridge Power Station) and no further comments on draft Policy S21 (RAF Cosford) already discussed earlier in ID28.
- 20.3. Paragraphs 49 and 50 relate to draft Policy S19 (Clive Barracks, Tern Hill), raising concerns about the viability and deliverability of this proposed allocation and requests further evidence to demonstrate that necessary infrastructure is deliverable.
- 20.4. To respond positively to this request, Shropshire Council has proactively engaged with the site promoter regarding the identified concerns.
- 20.5. Following this engagement both parties have agreed an addendum to the previously submitted Statement of Common Ground (SoCG) between the two parties, which is enclosed with this response.
- 20.6. The SoCG and its addendum demonstrate the site is viable and deliverable and that infrastructure necessary to serve future occupants will be delivered at the appropriate stages in the delivery of this site. This investment will also benefit the surrounding community.
- 20.7. With specific regard to assumptions on delivery timescales, Shropshire Council would note that:
  - a. Delivery timescale assumptions are not a result of concerns about site viability or deliverability, but reflect the timing of site disposal (expected in 2029).



b. Delivery timescale assumptions have been informed by and recognise the need to deliver necessary infrastructure at appropriate stages of the development.

c. Delivery timescale assumptions have been discussed and agreed with the site promoter. This is documented within the SoCG which includes *“Subject to the adoption of the Shropshire Local Plan (2016 – 2038), and determination of the future planning application(s) for Clive Barracks, the below delivery schedule should be used to indicate housing delivery at the site. This schedule has been informed by the evidence base and represents an appropriate and deliverable delivery trajectory for the site.”*

20.8. As also documented within the SoCG and its addendum, the promotion of the site and the Indicative Masterplan that has been prepared have been informed by a suite of technical evidence. This technical evidence provides confidence that infrastructure will be delivered at appropriate points within the development project.

20.9. The SoCG and its addendum again records the agreement reached on this matter, stating *“Any phasing of the delivery of the infrastructure requirements will be agreed with SC and the appropriate stakeholders ahead of and during determination of a planning application. These timescales will appropriately reflect the policy requirements within draft Policy S19 and the wider construction of the site.”*

20.10. Shropshire Council would also note that identification of proposed allocations has been informed by a proportionate and robust site assessment process (summarised within the Appendices of the Sustainability Appraisal and Site Assessment Environmental Report of the Draft Shropshire Local (SD006.01)) and a Delivery and Viability Study (2020) (EV115.01).



- 20.11. Shropshire Council considers Clive Barracks, Tern Hill is viable and deliverable and can deliver a policy compliant development.
- 20.12. Paragraph 51 of ID28 relates to concerns regarding the vagueness of policy wording within draft Policy S19. The intention of draft Policy S19 was to provide sufficient certainty about policy requirements, whilst maintaining flexibility. Furthermore, it is important to note that the wider policies within the draft Shropshire Local Plan expand on the policy requirements within draft Policy S19.
- 20.13. However, Shropshire Council has given this concern due consideration and has identified a series of proposed main modifications. These proposed modifications provide greater clarity on the intention of each policy requirement, including through appropriate cross referencing to other relevant policies within the draft Shropshire Local Plan.
- 20.14. These proposed main modifications are identified within the Updated Schedule of Main Modifications submitted alongside this correspondence.

## **21. Strategic Flood Risk Assessment**

- 21.1. Paragraph 52 of ID28 relates to the Council's Strategic Flood Risk Assessment (SFRA) and requests a note of clarification regarding the methodology and data relied upon with regard to hydraulic modelling and fluvial flood risk.
- 21.2. Shropshire Council has engaged with our consultants (JBA Group) that undertook both the Stage 1 and Stage 2 SFRA's to inform the preparation of the draft Shropshire Local Plan and they have prepared the requested note of clarification.
- 21.3. It is understood from this note that:
- a. The SFRA utilised a cautious and robust methodology.



- b. At the time that the SFRA was undertaken, it was based on best available information.
- c. The hydraulic modelling undertaken within the SFRA is considered to be comprehensive and robust.
- d. The approach to climate change modelling undertaken within the SFRA resulted in allowances that were generally comparable to those provided within the more recent guidance.

21.4. Furthermore, it is important to note that the site guidelines for all sites that contain a portion of the site within Flood Zones 2 and/or 3 specifically include a site guideline specifying that development will be excluded from these portions of the site.

21.5. In addition, draft Policy DP21 includes a requirement to undertake site specific flood risk assessments (FRA) for all development proposals that are:

*"a. In Flood Zones 2 and 3;*

*b. In Flood Zone 1 if the site is 1 hectare or above;*

*c. In Flood Zone 1 where there are critical drainage problems;*

***d. On land which either the Shropshire SFRA (Levels 1 and 2) shows, or more recent information indicates, is at increased risk of flooding either now or in the future e.g. through the impact of climate change;***

*e. On land subject to other sources of flooding (surface water, groundwater, infrastructure/sewer failure, reservoir overflow) where development would introduce a more vulnerable use; and*

*f. On land in those catchments identified in the Shropshire SFRA Level 2 as being at highest risk from the cumulative impacts of development."*  
*(my emphasis).*



- 21.6. Draft Policy DP21 then explains the required scope of a FRA, stating  
*“The FRA should demonstrate how flood risk, including residual risk, will be managed now and over the development’s lifetime, **taking climate change into account and with regard to the vulnerability of its users**. It should cover all sources of flooding and be proportionate to the scale and nature of the development and the flood risk involved. The FRA should show how the development has been designed to be resilient to both actual and residual flood risk...”* (my emphasis).
- 21.7. As such, these proposed policy requirements ensure that at the time of a development proposal all relevant sites are subject to FRA informed by the most up to date information at the time of the assessment, which ensures that flood risk is appropriately considered and informs these development proposals.
- 21.8. Within Paragraph 52 you also ask the Council to review the Statement of Common Ground (SoCG) with the Environment Agency (EA) and consider whether it needs to be updated in view of this. It is important to note that the EA were on the steering board for the SFRA. Following the completion of the Regulation 19 Consultation, the EA raised concerns that new climate change figures had emerged since the preparation of the SFRA. However, there is no suggestion from the EA that any site allocations are inappropriate as a result.
- 21.9. Shropshire Council has considered the SoCG with the Environment Agency and given the above, does not consider that it needs to be amended at this time.

## 22. Local Development Scheme

- 22.1. Paragraph 53 of ID28 addresses the Local Development Scheme (LDS) which provides the ‘Project Plan’ for the preparation of planning policy



documents over the next 3-year period. Within paragraph 52 you have requested that the LDS is updated and kept under review.

22.2. Shropshire Council has prepared an updated LDS enclosed with this response. The Council recognises the importance of keeping the LDS under review and will do so throughout the Local Plan examination.

## **23. Overall Conclusions**

23.1. Paragraphs 54-58 of ID28 provide the overall conclusions. Having carefully considered the various matters you have raised within ID28, Shropshire Council has undertaken additional work and where appropriate identified further proposed modifications.

23.2. When you have considered this information, the Council would welcome your views and discussion of our next steps, including any need to consult on the information provided and the further proposed modifications, the need for further discussion of these matters during a mop-up hearing, and the timescales for the Stage 2 Hearings.

23.3. As recognised within your correspondence reference ID33, all parties are keen to progress to the Stage 2 Hearings as soon as possible.

Yours sincerely

Eddie West  
Planning Policy and Strategy Manager  
Shropshire Council







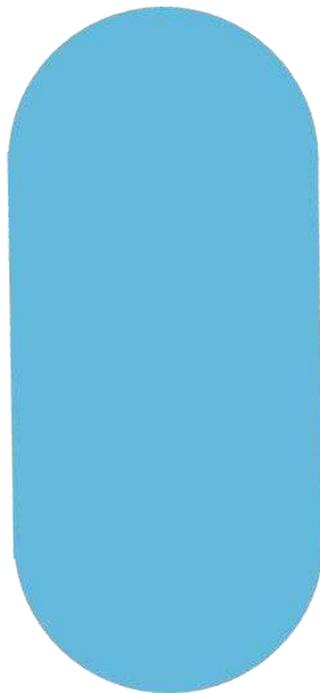
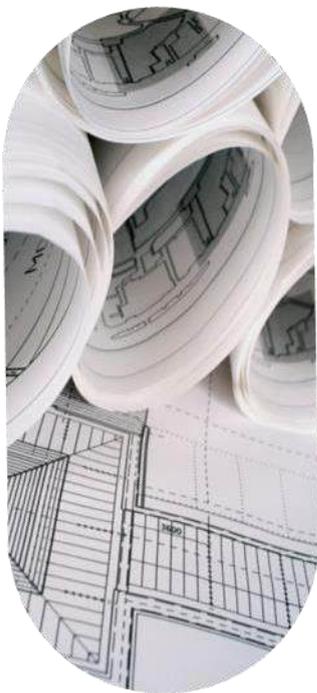
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## Boningale Homes Limited

Shropshire Local Plan

Consultation on GC25, GC44, GC45 and

GC46





## 1. Introduction

- 1.1 This representation has been prepared on behalf of Boningale Homes Limited in response to the ongoing public consultation on the below listed evidence base documents prepared to support the emerging Shropshire Local Plan.
- GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs;
  - GC44: Shropshire Local Plan Updated Sustainability Appraisal Report 2024;
  - GC45: Updated Housing and Employment Topic Paper; and
  - GC46: Updated Green Belt Topic Paper.
- 1.2 This representation should be read in the context of support for the preparation of the Shropshire Local Plan. The comments provided within are designed to assist the Council in producing a Plan capable of being found sound, which is supported by a robust and consistent evidence base.
- 1.3 We consider that the approach being taken by the Council with regard to the quantum of development being planned for is appropriate and justified, however we have notable concerns relating to the identification of suitable land to meet the identified and justified minimum housing requirements.
- 1.4 Boningale Homes are promoting land at Albrighton South for a residential led development of up to 800no. residential dwellings, a secondary school, care home, supermarket and flexible employment space. We consider, given the proximity of the site to Wolverhampton and the Black Country, along with the Council's assessment of the development potential of the site within the Additional Sustainability Appraisal Assessment (GC44) that the Council should and indeed must, in order for their Plan to be capable of being found sound, allocate additional land, within Albrighton to meet the unmet needs of the Black Country.



## 2. GC25: The newly proposed draft policy on Housing provision for Older People and those with Disabilities and Special Needs

- 2.1 National Planning Practice Guidance on Housing for Older and Disabled People specifies that *“Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.”* It also specifies that *“The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.”*
- 2.2 The government have stated that the need to provide housing for older people is now critical (National Planning Policy Housing for Older and Disabled People (Paragraph 001)).
- 2.3 Boningale Homes support the recognition of the need to provide specialist housing to meet the needs of older residents in Shropshire. We consider that strategic residential developments offer an ideal opportunity to combine market, affordable and specialist housing viably, providing much need infrastructure and wider support for those within local communities that may require additional support.
- 2.4 Whilst the Council’s intention to address this urgent need, we object to the policy as currently drafted.
- 2.5 It is noted that the policy refers to all properties that are design to M4(2) and M4(3) standards should be designed to be ‘dementia friendly. Support text at paragraph 43 provides a link to guidance produce by the Alzheimer’s Society, but we consider that there is insufficient evidence within the policy to allow for consistent application by decision makers.
- 2.6 Further, in the absence of updated Viability evidence, it is unclear if the proposed M4(3) standards and the approach to ‘dementia friendly) design have been considered with regard to wider viability implications.
- 2.7 Local Plan policies should not contain such prescriptive requirements that could ultimately render an otherwise viable development opportunity viable.

- 2.8 We consider that with regard to this, it is essential that the Council produce an addendum/update to the Viability evidence and seek to establish sufficient flexibility within the policy that would allow for circumstances where deviation from the policy position is justified when sufficiently and robustly evidenced.
- 2.9 Whilst Boningale Homes support the option for delivering homes for key workers, we consider it necessary that criterion 11 of the draft policy is amended. As currently drafted the criterion states that proposals that include dwellings for key workers should be proactively considered. Once again, the wording of this criterion does not allow for consistent application by applicants or indeed by decision makers.
- 2.10 Criterion 15 of the draft policy states that on site allocations for 250 or more dwellings and all development sites for 250 or more dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 20% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs.
- 2.11 Again, it is unclear if this element of the policy has been subject to viability testing. It is imperative that, particularly with larger strategic sites, that are likely to deliver a range of infrastructure and facilities, that policies do not place overly restrictive requirements, such as that listed at criterion 15, on development proposals. Additional flexibility should be established within this policy to allow for application on a site-by-site basis. Additional clarity is further required with regard to the contribution that affordable units can make to the proposed requirement on strategic sites.
- 2.12 Boningale Homes support criterion 18 of the draft policy and consider it appropriate and justified that where evidence supports additional development beyond the level of growth set out within the defined strategy, housing to meet the needs of specialist groups will be supported.



### 3. Shropshire Local Plan Updated Additional Sustainability Appraisal Report

- 3.1 The Planning Inspectors Examining the draft Shropshire Local Plan released their Interim Findings paper (ID28) on February 15, 2023. This came after the first round of hearings, which covered legal and strategic matters (including strategic policies). The main Hearing Sessions took place in July 2022, and in January 2023, there was an additional session dedicated to the Duty to Cooperate.
- 3.2 In terms of SA, the Planning Inspectors come to the conclusion that further SA work should be done in relation to Policy SP2 and the Association of Black Country Authorities' (ABCA) Unmet Housing and Employment Land Needs. This was required for the evaluation of the draft Shropshire Local Plan, guarantee adherence to Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations (2004) and ensure the draft Shropshire Local Plan's legal compliance.
- 3.3 Within paragraph 13 of ID28 the Planning Inspectors conclude: *"In principle, the Council's intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire's housing need to meet some of this externally derived unmet need."*
- 3.4 In paragraphs 17–20 of ID28, the Planning Inspectors express their worry that the choice to meet part of the Black Country's land needs for employment and housing may have altered the objectives and parameters of the draft Shropshire Plan. These contributions were not taken into consideration by the SA, which tested options based solely on meeting Shropshire's needs, because this decision was made between the Regulation 18 and Regulation 19 stages of plan making, after much of the evidence base, including the SA, had been completed.
- 3.5 *As such, the Planning Inspectors explain within Paragraph 20 of ID28*



*“Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country. In carrying out this work, consideration also needs to be given to the selection of the preferred strategy when judged against reasonable alternatives. For example, by testing a scenario which includes the originally envisaged ‘high growth scenario’ and a contribution towards unmet housing needs.”*

3.6 *Within Paragraph 21 of ID28, the Planning Inspectors explain that if the intention remains to include proposed contributions to the unmet housing and employment land needs of the Black Country, then “the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.”*

3.7 It is reasonable to assume that without undertaking the necessary work, set out within ID28, the draft Shropshire Local Plan would not be capable of being found sound and the Council would in all likelihood, given the elongated Examination process to date, be asked to consider withdrawing the Plan or risk the Plan being found unsound by the Planning Inspectors.

3.8 As such, the Council have undertaken additional SA testing, as set out in the Updated Additional SA (GC44).

### **The Updated Additional SA**

3.9 The updated additional SA assessment work included assessment of the three reasonable options for the housing requirement (each with and without a proposed contribution to the unmet housing need forecast to arise in the Black Country).

3.10 The updated additional SA assessment work concluded that none of the options are likely to result in a strongly negative effect.

3.11 It also concluded that only one option is likely to result is a strongly positive effect. This is Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs, which is likely to result in a strongly positive effect in the short, medium and long term on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society, and potentially in the long term on SA objective 4: promoting access to services for all sections of



society.

- 3.12 The updated additional SA assessment, aligned with previous iteration of the SA, ultimately concluded that on balance, Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs represented the most sustainable of the reasonable options for the level of housing growth identified. Further detail on the outcomes of this updated additional SA assessment work is provided within the Updated Additional SA Report.
- 3.13 Boningale Homes consider that Growth Option 3b is appropriate and fully justified and demonstrates that the Council area and continue to take a proactive approach to seeing economic and social growth for existing and future residents of the Plan area.
- 3.14 On the basis of the conclusion drawn by the Council with regard to planning to meet the requirements set out within Option 3b and aligned with the above references set out within the Inspectors Interim Findings (ID28) the updated additional SA considers option for accommodating the uplift.
- 3.15 Four reasonable options for accommodating the uplift were identified and assessed through the Updated Additional SA.
- 3.16 These are:
- a) Option 1: Increasing Settlement Guidelines and Windfall Allowances.
  - b) Option 2: Densification of Proposed Site Allocations.
  - c) Option 3: Increasing Site Allocations.
  - d) Option 4: A Combination of Two or More of the Other Options.
- 3.17 The SA process concluded that Option 1: Increasing Settlement Guidelines and Windfall Allowances. The Council's subsequent planning judgement exercise also concluded this was the most appropriate option for inclusion within the draft Shropshire Local Plan.
- 3.18 Boningale Homes have significant concerns about the conclusions set out within the Updated Additional SA, as is set out below, and support the identification of additional Allocations as set out under Option 3.
- Option 1: Increasing Settlement Guidelines and Windfall Allowances**
- 3.19 Within the proposed Shropshire Local Plan, settlement housing guidelines define the extent of residential development specifically allocated for a settlement. Key considerations in situations where the projected settlement



- housing guideline is either unlikely to be fulfilled or likely to be exceeded are summed up in Draft Policy SP7: Managing Housing Development.
- 3.20 Windfall allowances, which include "saved" SAMDev allocations and proposed allocations, are essentially the difference between the housing guidelines for settlements and the capacity of completions already achieved in the proposed plan period / identified commitments. This allowance may be attained by the emergence of more homes on "windfall sites," which are unplanned locations made possible by the draft Shropshire Local Plan, or by the emergence of more homes in a community from other sources.
- 3.21 Whilst Boningale Homes fundamentally support the allocation of development within the most sustainable settlements within Shropshire, thus supporting the principle of settlement housing guidelines, they do not consider it appropriate to limit sustainable development opportunities outside of the defined guidelines. To do so would be to prevent otherwise sustainable opportunities for growth in settlements, such as Tilstock, where meaningful housing growth could support significant infrastructure and wider social and economic growth and benefits.
- 3.22 Further, we have significant concerns with regard to the Council's stated reliance on windfall development, not least because with specific regard to meeting unmet housing needs, it is essential to ensure that growth is met as close to the area from which the need is arising and a reliance on windfall development does not allow for this to be controlled.
- 3.23 Unmet needs, in the case of assisting the Black Country, should be met as close to the Black Country as possible and should be located within an area that has strong structural, infrastructure and social connections.
- 3.24 As is detailed further below, Boningale Homes have submitted an outline planning application for the development of up to 800no. residential dwellings, land for a Secondary School, land for a Supermarket, land for a GP Surgery and Pharmacy, land for a Care Home and flexible employment space, to the south of Albrighton.
- 3.25 The site is physically as close to the Black Country as it is possible to be within Shropshire and is located on the main road connecting Shropshire to Wolverhampton. It is served by a train, providing regular services to Wolverhampton and Birmingham, and residents living within the development at South Albrighton, would have a range of sustainable



transport options providing a connection to the Black Country for work and for access to family and social networks for support. This is touched on further below in our response to Option 3.

- 3.26 In addition to concerns relating to the ability to strictly control the location and delivery of windfall development, we further consider that the Council simply have not justified or provided sufficient evidence to suggest that sufficient windfall development will come forward within the Plan period to account for the level of windfall development that is required within Option 1 to support the growth scenario set out in option 3b for wider development.
- 3.27 It is not positively prepared or justified to rely on existing commitments and windfall development to meet the indicative level of housing required. We consider additional housing land should be identified across the settlement hierarchy to provide assurance that the overall housing requirement will be delivered in full. Indeed, there may be circumstances where planning permissions lapse, sites do not progress, the impact of economic changes and, as such, the allocation of additional housing land for residential development in the Plan will provide a positive mechanism for such circumstances.
- 3.28 The Council will need to demonstrate very clearly, the expected sources of windfall development and details of previous rates of windfall development, significantly however, this should be across the settlements defined within Option 3, that have defined guidelines. The below shows the extent of windfall changes necessary to deliver Option1;



Settlement	Windfall Data	
	Proposed Windfall Allowance: Appendix 5 of the Draft Shropshire Local Plan (at 31st March 2019)	Current Windfall Allowance Reflecting Commitments & Completions (at 31st March 2023) <sup>7</sup>
Albrighton	48	21
Bishops Castle	40	35
Bridgnorth	160	7
Broseley	50	-17
Church Stretton	121	84
Cleobury Mortimer	120	-5
Craven Arms	94	86
Ellesmere	170	130
Highley	31	9
Ludlow	82	57
Market Drayton	206	60
Much Wenlock	27	7
Oswestry	105	62
Shifnal	92	68
Shrewsbury	505	-81
Wem	89	94
Whitchurch	82	-55
Clive Barracks, Tern Hill	0	0
Former Ironbridge Power Station	0	-75

- 3.29 It should also be noted, that a reliance on unplanned, and to a large degree uncontrolled windfall development also has the potential to have a significant and negative impact on the provision of affordable housing and wider infrastructure benefits. The benefits of allocating strategic scale sites, where affordable housing will be a policy requirement and where additional infrastructure can be delivered should not be underestimated.
- 3.30 Shropshire, as with the entire nation, has a chronic and persistent poor record and undersupply of affordable housing, and it is particularly pertinent to note that as do the Black Country Authorities from which the need being planned for here is being identified, and as such, the risk in relying on smaller sites that could potentially fall below the policy requirement for affordable housing delivery, or might indeed have wider viability issues, should be given due and careful consideration by the Council.
- 3.31 Further, Option 1 may have a negative effect on the protection and enhancement of the range of plants and animals in Shropshire and the quality and extent of wildlife habitats because of the associated development.
- 3.32 This option may also have a negative effect on the reduction of flood risk/improvement of flood management and reduction of air



pollution/protection of air quality, particularly as it concentrates more development in urban areas.

3.33 This option would likely have a negative effect on the conservation and enhancement of landscape character and local distinctiveness, as whilst it focuses the additional development in existing urban areas, which is likely to minimise harm to rural landscapes, it is still likely to change the character of those places where the majority of people currently live.

3.34 As such, Boningale Homes, do not support the identification of Option 1 as being the most suitable option to meet the unmet housing needs of the Black Country.

### **Option 3: Identification of Additional Sites**

3.35 This option would entail increasing site allocations in order to increase capacity. This could be through the extension of the site area of one or more existing proposed allocations and/or identification of one or more additional site allocations (such as through the early release of proposed safeguarded land, identification of new strategic site allocations or identification of new site allocations associated with existing settlements) in order to provide additional capacity.

3.36 Where this option would involve expanding the site area of one or more proposed allocations, it would still be in line with the urban focus principle because most proposed allocations are linked to urban settlements (though some are linked to rural settlements as well). If it involved identifying one or more urban focus areas, it may also stay consistent with the notion of urban focus, such as development at Albrighton.

3.37 This option would also likely support the encouragement of a strong and sustainable economy throughout Shropshire. However, the extent of this impact would largely be dependent on the location of any extensions to existing proposed allocations/new proposed allocations. Proposed site allocations are assessed separately within the SA process, and the impact of individual sites is considered in detail.

3.38 This alternative has the potential to be beneficial for a variety of SA objectives. All facets of society should be encouraged to access services; sustainable modes of transportation should be encouraged; driving less is necessary; carbon dioxide emissions should be decreased; communities that are active and healthy should be supported; and adaptation and



mitigation of climate change should be encouraged.

3.39 As is detailed above, we fundamentally support the identification of additional sites to meet the 1,500 dwellings unmet need from the Black Country. We do not support the intensification of existing allocation, where said allocations already meet the existing justified density set out within the Council's evidence base.

3.40 Whilst we do support the allocation of additional sites and the methodology set out within the additional updated SA with regard to the identification of an appropriate growth strategy, we have identified a range of inconsistencies with regard to the assessment of sites within CG44.

3.41 Through the updated SA site assessment process, a series of sites have been identified to accommodate the proposed 1,500 dwelling contribution to the Black Country. These are:

- a) BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
- b) SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
- c) IRN001 - Former Ironbridge Power Station: 600 dwellings

3.42 The additional updated SA considers each site, including the above against a range of criteria. The scoring for the above, and indeed the land at Albrighton South (P36a and P36b) detailed below, are as follows;

<b>Criteria</b>	<b>BRD030</b>	<b>SHR060</b>	<b>IRN001</b>	<b>P36a/P36b</b>
Settlement Conclusion	Fair	Fair	Fair	Fair
Black Country Conclusion	Fair	Good	Fair	Fair/Good

3.43 With regard to the above, we do not support the conclusion of in respect of P36 and the Black Country conclusion. We consider, that given the proximity and scale or proposed development the site should as a minimum score a high here.

3.44 Turning specifically to the development potential of the three sites listed above, we are concerned that there has been insufficient consideration given to the viability and ability for the sites to deliver a policy compliant level of affordable housing and the wider infrastructure required to make the



development otherwise suitable and sustainable for development. We further consider that the allocation of these sites does not make the best use of the strategic connections with the Black Country and that the Council should consider allocating sites, that are supported by technical evidence in terms of the proposed quantum of development and the infrastructure proposed being deliverable within the Plan period.

- 3.45 Noting the constraints listed within the SA in regard to each of these, including archaeological constraints, flood risk and drainage complexities, land assembly issues and some remediation requirements, we do not consider that the scale of development proposed will be deliverable within the identified Plan period.

#### **Land at Albrighton South**

- 3.46 As is detailed above, Boningale Homes are promoting land at Albrighton South. A planning application has been submitted to the Council and is awaiting validation. The application proposal comprises 800no. residential dwellings, a new Secondary School, a Supermarket, a GP Surgery and Pharmacy, a Care Home and flexible work space. The proposal will provide a policy compliant level of affordable homes and will create a new spine road and gateway into Albrighton.

- 3.47 The Council have considered the site within the additional updates SA under (along with some additional land) P36a and P36b.

- 3.48 The SA proposes to retain the land as Green Belt and concludes the following;

*“Safeguarded land available to meet settlement development requirements along with infill and exception site opportunities.*

*The sites availability is currently unknown.*

*The site is considered to be located within a sensitive Green Belt parcel, the release of which would have high harm.*

*The site is poorly related to the built form of the settlement.*

*Whilst the site's size and location (proximity and connectivity to the Black Country) could mean that it is an appropriate location to meet cross-boundary needs arising in the Black Country, it is considered that there are other more appropriate sites upon which to accommodate these proposed contributions.*



*Development of the alternative sites identified to accommodate the proposed contributions to the unmet needs forecast to arise within the Black Country is considered to constitute sustainable development and accommodating parts of these proposed contributions on them would contribute to the achievement of the wider spatial strategy for Shropshire.*

*The site is therefore not proposed for inclusion within the draft Shropshire Local Plan”.*

3.49 However, aligned with our above comments with regard to the proposed approach being taken to meeting the agreed unmet housing needs, it is incredibly pertinent to note the strategic considerations set out within the additional updated SA;

*“There is safeguarded land to the east of Albrighton intended to make provision for settlement development needs.*

*This site is in Green Belt to the south of the settlement. As the sites availability is currently unknown, the site is not considered suitable for allocation. However it may have potential for future safeguarding.*

*The Green Belt Assessment undertaken for Shropshire indicates that this site is located within a Green Belt parcel which performs weakly against purpose 2; moderately against purpose 3; and strongly against purpose 4.*

*The Green Belt Review undertaken for Shropshire indicates that the release of the parcel containing this site would have a high level of harm on the Green Belt.*

*5% of the site is located within the 30 year surface flood zone, 7% within the 100 year surface flood risk zones and 15% within the 1,000 year surface flood zone.*

*Whilst the sites northern point is adjacent to the built form of the settlement, the site generally has a poor relationship to the built form of Albrighton and projects into the countryside.*



*The site may have archaeological potential.*

*The site is located within a source protection zone, Environment Agency Guidance will need to be considered. The site contains grades 1/2/3 agricultural land.*

*Applying the precautionary principle this is considered best and most versatile agricultural land.*

*The site is situated in Albrighton, which benefits from proximity to the Black Country and strong transport links via the M54/A5 corridor, A41 corridor and a railway station on the Shrewsbury to Wolverhampton line.*

*The site is also of a sufficient scale to accommodate a meaningful proportion of the proposed contribution to the unmet need of the Black Country, should it be identified as a proposed allocation”.*

3.50 With regard to the conclusions of the Green Belt Assessment, the application that has been submitted to the Council includes a detailed Green Belt Assessment, which demonstrates that development of the site, with regard to Green Belt Harm will be low-moderate and indeed, that with the mitigation proposed through the retention and enhancement of existing boundary features, the use of strategic buffers and a significant overprovision of green infrastructure, release of land from the Green Belt in this location, along with development of the site, would have materially lower Green Belt impacts than the sites identified by the Council for allocation and those listed above within this report.

3.51 In addition to the Green Belt Assessment, the application is supported by a detailed suite of technical reports, including a Heritage and Archaeological Statement, a Flood Risk Assessment and Drainage Strategy and Ecological Assessments. These reports demonstrate that the concerns raised by the Council within the SA relating to archaeology, flooding, BMV and ecology are unsubstantiated and that there is indeed, no technical impediment to development coming forward in this location.

3.52 The SA significantly notes that the sites is strategically located adjacent to the Black Country from where the unmet housing needs are arising and



- has excellent transport links, including sustainable transport connections whereby residents could freely move to and from the Black Country without giving rise to unsustainable transport/commuting movements.
- 3.53 The SA further indicates that the site is suitable for safeguarding. Boningale Homes do not consider it appropriate to safeguard the site, but consider that the site should be allocated as part of this Plan, but note that in stating that the site is suitable for safeguarding, the Council clearly consider that the site is suitable for Greeb Belt release and allocation for development at some point.
- 3.54 Whilst it is noted that the SA fails to note that the site is owned and is actively being promoted for residential-led development, and states that it is unclear if the site is available, the site is controlled by a well respected and known housebuilder developer, who is actively in the process of building out a site within Albrighton at present. Boningale Homes are committed to seeing the site come forward for residential development and are further committed to delivering the wider infrastructure and improvements needed, not just to support development of the site in question, but to support the continued growth and long-term vitality and vibrancy of Albrighton for current and future developments.
- 3.55 Allocation of the site for up to 800 dwellings would make a significant contribution to meeting the 1,500 dwellings unmet need from the Black Country in the single most sustainable location to do so.
- 3.56 We consider, aligned with the above, that without the allocation of additional land and specifically, without the allocation of the the most suitable alternative, Albrighton South, the Council simply cannot demonstrate that they have a sound Plan that is capable of being delivered over what is left of the emerging Plan period.



## 4. GC45: Housing and Employment Topic Paper

- 4.1 The element of the representations prepared on behalf of Boningale Homes should be read in the context of an overall support for the growth higher growth scenario, along with accommodating unmet need from the Black Country.
- 4.2 We do however note the significant and growing unmet need and refer the Council to recent Full Council reports prepared by Wolverhampton City Council which indicate far more significant unmet need issues than had been previously met. It therefore is reasonable to assume that additional needs from the Black Country will need to be addressed in this Plan or indeed in future iterations of the Plan and where the Council may wish to accommodate unmet employment needs so as to continue to see significant growth in the Shropshire economy, it will be necessary to ensure that this marries with the provision of housing in the Council area. Further, the Council should have regard to the social and economic benefits associated with housing-led growth, particularly that, which can deliver wider infrastructure and employment opportunities.
- 4.3 Within paragraph 13 of ID28, the Planning Inspectors specified that *“the Council’s intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire’s housing need to meet some of this externally derived unmet need.”*
- 4.4 The proposed housing requirement is therefore a minimum of 31,300 dwellings between 2016 and 2038, which equates to an annual average of around 1,423 dwellings.
- 4.5 This represents:
- a) A continuation of the ‘High Growth’ option for the housing requirement previously identified and contained in the submission version of the draft Shropshire Local Plan (15% uplift to local housing need);



- b) An uplift of 500 dwellings on the housing requirement proposed in the submission version of the Plan; and
- c) A continuation of the specific contribution of 1,500 dwellings towards the unmet housing need forecast to arise in the Black Country proposed within the submission version of the draft Shropshire Local Plan. This is however now achieved through a further specific uplift of 1,500 dwellings, rather than having these dwellings 'blended' into the housing requirement as proposed in the submission version of the Local Plan.

### **National Planning Policy Framework (NPPF, 2023)**

- 4.6 At paragraph 11, the NPPF states how *"Plans and decisions should apply a presumption in favour of sustainable development."*
- 4.7 Paragraph 11 moves on to state *"For plan-making this means that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas."* (our emphasis)
- 4.8 Furthermore paragraph 35 a) states that Local Plans are 'sound' if they are *"positively prepared", i.e., "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development."* (our emphasis)
- 4.9 These policies make it clear that meeting objectively assessed needs is the minimum expectation of a Local Plan.
- 4.10 What this means for housing need is explained in section 5 of the NPPF, 'Delivering a sufficient supply of homes'.
- 4.11 Under this heading, paragraph 60 of the NPPF states, *"The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community."* (our emphasis)
- 4.12 Paragraph 61 moves on to state how the minimum number of homes needed in an area should be determined. It states *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance."*



- 4.13 However paragraph 61 moves on to state *“The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals.”* (our emphasis)
- 4.14 Furthermore in respect of neighbouring areas which may not be able to meet their own need, paragraph 61 states *“In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”* (our emphasis)
- 4.15 It is therefore clear that the assessment of need in any given area should include unmet need from neighbouring local authorities if it exists.
- 4.16 Whilst the Shropshire Local Plan is being examined under previous iterations of the NPPF, it is pertinent to note that the December 2023 NPPF also introduces the link between economic growth aspirations and housing need, paragraph 67 stating *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”* (our emphasis)
- 4.17 This is also reflected in section 6 of the NPPF, ‘Building a strong, competitive economy’ and specifically in paragraph 86 c) which states that planning policies should *“seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.”*
- 4.18 These policies relating to housing need are then addressed in more detail in the ‘Housing and Economic Needs Assessment’ (HENA) section of the Planning Practice Guidance (PPG) which is discussed below.



## Planning Practice Guidance (PPG)

- 4.19 The method by which housing need should be established, and an explanation of the ‘Standard Method’ (SM) referred to in the NPPF is set out in detail in the HENA section of PPG (section ID2a).
- 4.20 At the outset the PPG states, “*Housing need is an unconstrained assessment of the number of homes needed in an area*” and goes on to state “*Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.*”<sup>1</sup> (Our emphasis).
- 4.21 The PPG is very clear that the assessment of need should be unconstrained and is an entirely separate exercise from establishing the housing requirement.
- 4.22 The PPG then moves on to explain what the SM provides. It states “*The standard method uses a formula to identify the minimum number of homes expected to be planned for. The standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure.*”<sup>2</sup> (Our emphasis).
- 4.23 This section emphasises how the SM provides the minimum housing need figure and highlights how the SM does not produce a housing requirement figure. A separate part of PPG addresses housing requirement.
- 4.24 The PPG also makes a very clear distinction as to the tests which will be applied if local authorities seek to justify housing need higher or lower than the SM minimum.
- 4.25 In respect of a housing need figure lower than the standard method minimum, the PPG states “*where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.*”<sup>3</sup> (Our emphasis).

<sup>1</sup> Paragraph ID:2a-001, PPG, 2019

<sup>2</sup> Paragraph ID:2a-001, PPG, 2019

<sup>3</sup> Paragraph ID:2a-015, PPG, 2019



- 4.26 In contrast, in terms of establishing housing need which is above the Standard Method, PPG states “Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”<sup>4</sup> (Our emphasis).
- 4.27 Having established that SM represents minimum need, and that actual housing need may be higher, the PPG moves to discuss when it might be appropriate to plan for a higher housing need figure than the SM indicates.
- 4.28 PPG therefore states that “there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”<sup>5</sup> (Our emphasis)
- 4.29 In discussing these circumstances PPG reiterates how the standard method only represents minimum need, stating “The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.”<sup>6</sup> (Our emphasis)
- 4.30 The PPG then moves on to discuss what circumstances might lead to an increase in housing need, but confirms at the outset that the circumstances it refers to are not exhaustive and there may be other reasons as to why overall housing need exceeds the Standard Method’s minimum calculation:

**“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:**

- **growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);**
- **strategic infrastructure improvements that are likely to drive**

<sup>4</sup> Paragraph ID:2a-015, PPG, 2019

<sup>5</sup> Paragraph ID:2a-010, PPG, 2019

<sup>6</sup> Paragraph ID:2a-010, PPG, 2019



an increase in the homes needed locally; o

- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;
- There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more homes. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”<sup>7</sup>

- 4.31 The PPG also reiterates that this assessment of need is separate to the process of establishing a housing requirement, stating that the circumstances which may lead to a higher need figure “*will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan)*”<sup>8</sup> (Our emphasis).
- 4.32 The delivery of much needed affordable housing can also have an impact on the assessment of overall need. In this respect the Planning Practice Guidance (PPG) states “*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*”<sup>9</sup>
- 4.33 Therefore, aligned with our comments set out in Chapter 3 and aligned with the principles set out in the NPPF and PPG listed above, Boningale Homes support the approach being taken to the identified housing requirement and consider that the approach being taken to adopting the higher growth scenario and unmet housing need from the Black Country is justified and demonstrates that the Council are committed to ensure that Shropshire continues to be a place that people wish to work and live..

<sup>7</sup> Ibid

<sup>8</sup> Paragraph ID:2a-010, PPG, 2019

<sup>9</sup> Paragraph ID2a:024, PPG, 2019



- 4.34 Further, the approach being taken will ensure that the Council benefit significantly from the socio-economic benefits associated with housing growth, including retained local spend, new homes bonuses, Council tax returns, the creation of direct and in-direct short-term and long-term jobs and wider support with delivery the infrastructure, such as schools and health care facilities, that given current national funding opportunities, would simply not be deliverable and as such of benefit to residents of Shropshire.
- 4.35 In summary, we consider that the approach taken is justified, reasonable and is sound.



## 5. GC46: Updated Green Belt Topic Paper

- 1.1 Paragraph 6.5 of the Updated Green Belt Topic Paper States
- “Having reflected on the proposed spatial strategy, the strategic role of the settlement, known development constraints, identified issues and opportunities, and having reviewed the site promotions received within the settlement, the draft Shropshire Local Plan proposes that in Albrighton:*
- a. New residential development will primarily be delivered through existing commitments (including the proposed ‘saved’ SAMDev Plan allocations which now either benefit from Planning Permission or are subject to a current Planning Application) and a further residential allocation (ALB017 & ALB021), consisting of the remaining safeguarded land to the east of the settlement. This will be complemented by any appropriate small-scale windfall residential development within the Albrighton development boundary and appropriate exception development.*
- b. New employment development will primarily be delivered at the nearby RAF Cosford major developed site. This will be complemented by appropriate small-scale windfall employment development within the Albrighton development boundary shown on the draft Policies Map, where it is consistent with relevant policies of the Local Plan.*
- As such, for the avoidance of doubt, no land is proposed to be removed from the Green Belt at Albrighton in order to achieve the proposed settlement strategy for the settlement or the proposed spatial strategy.”*
- 1.2 Accordingly, the updated Green Belt Topic Paper does not consider or seek to review the assessment previously made in respect of the land at Albrighton South.
- 1.3 Aligned with the above, and the supporting Green Belt Assessment prepared in support of the Albrighton South application, we have concerns about inconsistencies in the approach taken by the Council previously and suggest that it is appropriate and fundamentally necessary for the Council to consider the release of land from the Green Belt in Albrighton.



## 6. Conclusions

- 1.1 These representations have been prepared on behalf of Boningale Homes.
- 1.2 Boningale Homes are a respected Shropshire based housebuilder who have and continue to contribute to the wider Shropshire economy.
- 1.3 Boningale Homes are fundamentally supportive of Shropshire Council getting a Local Plan adopted, particularly noting the time and financial pressures faced in getting as far as the Council currently are. Failure to adopt a sound Plan at this point, given the resource and effort to get to Examination in Public would be harmful and problematic for the Council and would doubtless lead to a number of speculative, uncontrolled applications for development that almost certainly won't deliver the infrastructure and affordable housing required to 2038.
- 1.4 The representations provide a response to the additional and updated evidence base documents prepared following the interim comments from the Inspectors and should be read in the context of support for the Local Plan,
- 1.5 We are supportive and consider that the approach taken to identifying and justifying the proposed housing target is appropriate and demonstrates proactive and best practice planning.
- 1.6 However, we are concerned with the approach being taken to meeting the 1,500 dwellings unmet housing needs from the Black Country.
- 1.7 The Council should seek to allocate additional land, as close to the Black Country as possible and should ensure that where possible the land allocated can make a significant infrastructure and affordable housing contribution.
- 1.8 Boningale Homes are promoting land at Albrighton South, which lies as close to the Black Country as is possible within the Shropshire boundary and with excellent road and public transport connections.
- 1.9 The Council have identified that this site is suitable for safeguarding within the latest SA and we consider that without allocating the site, the Council simply cannot deliver a sound Local Plan.
- 1.10 The site is supported by a recently submitted planning application, which includes a full suite of supporting technical reports demonstrating the



development potential.

- 1.11 Boningale Homes formally request to participate in the Examination hearing sessions moving forward.



KEY	
	Application boundary
	Existing vegetation - Pink dashed line indicates root protection area - As per Tree Retention Plan by FPCR (ref 12322-T-01)
	Existing vegetation to be removed
	Existing contours - major (dark grey) and minor (light grey)
	Proposed residential built form
	Proposed spine road
	Proposed secondary street
	Proposed tertiary street
	Proposed shared surface / private drives
	Proposed pedestrian footpath
	Proposed NEAP
	Proposed informal play opportunity
	Proposed public art opportunity - variety of features responding to their surrounding context
	Proposed feature tree
	Proposed native tree
	Proposed street tree
	Proposed orchard tree
	Proposed native tree belt with native shrub understorey
	Proposed native hedgerow
	Proposed wet tolerant native shrub
	Proposed ornamental shrub
	Proposed marginal planting
	Proposed amenity grass
	Proposed wildflower meadow
	Proposed tussocky meadow
	Proposed wet-tolerant meadow to SuDS basins



DRAFT



# LAND AT PATSHULL ROAD, ALBRIGHTON - ILLUSTRATIVE LANDSCAPE MASTERPLAN

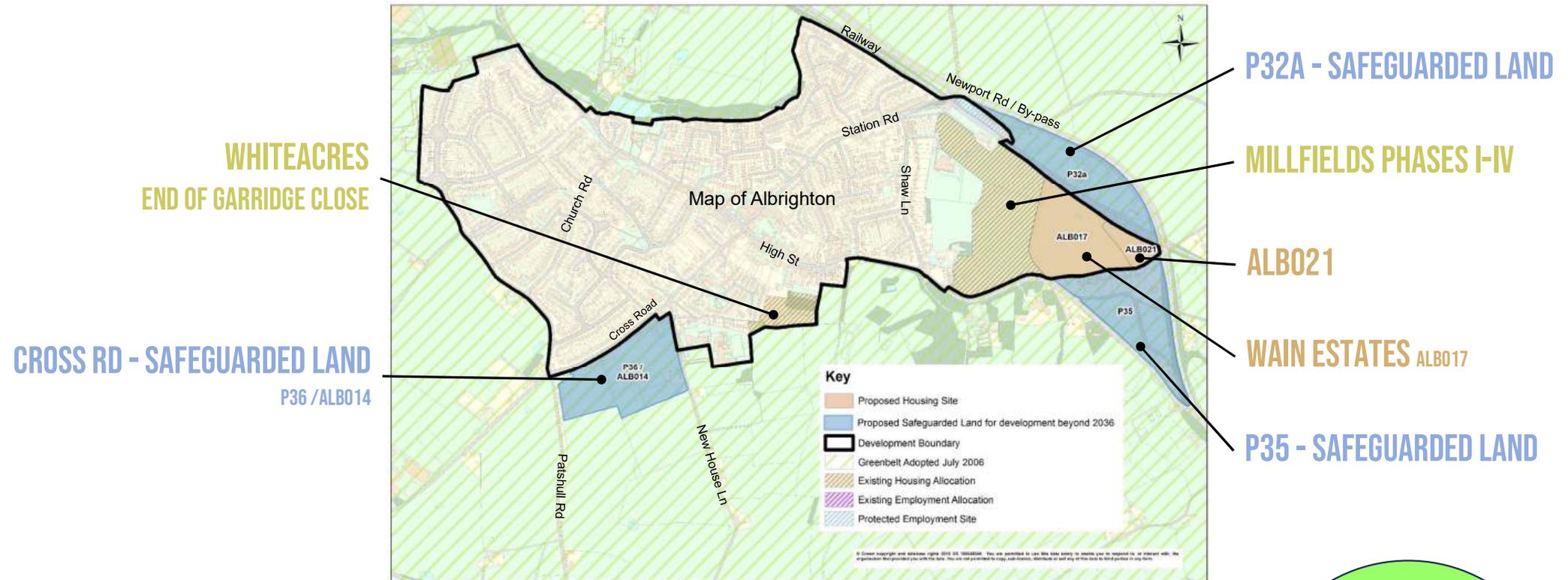


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**APPENDIX 4:**

# ALBRIGHTON'S EXISTING LOCAL PLAN HOUSING SITES

EXCLUDING BONINGALE HOMES ALBRIGHTON SOUTH PROPOSALS



CROSS RD - SAFEGUARDED LAND  
P36 / ALB014

P32A - SAFEGUARDED LAND

MILLFIELDS PHASES I-IV

ALB021

WAIN ESTATES ALB017

P35 - SAFEGUARDED LAND

## WHAT IS SAFEGUARDED LAND?

Safeguarded Land is currently in Green Belt but is planned in the Shropshire Local Plan to be safeguarded for development after 2038 (not before). These are shown in blue on the plan.

The updated Local Plan Additional Material - Greenbelt Topic Paper states that "Planning permission for the permanent development of safeguarded land should only be granted...once allocated for development within a future Local Plan...to meet the needs of Shropshire"

Name of development		Site reference	Planning reference	Status	Approximate number of houses		Site Area (Ha)
Boningale Homes	Millfield Phase 1	Millfield	14/05456/REM (PHASE 1)	Built and sold	59	257 total Millfield	
	Millfield Phase 2	Millfield	15/02448/FUL (PHASE 2A)	Built and sold	65		
	Millfield Phase 3	Millfield	23/00870/FUL (PHASE 3)	Being built Permission granted 23/10/23	43		
	Millfield Phase 4	Millfield	23/02095/OUT (PHASE 4)	Validated: Wed 17 May 2023 Status: Pending Consideration	90		
Wain Estates	Wain Estates Kingswood Road (east of Millfield)	ALB017	Included in Shropshire Local Plan as a 'Proposed Housing Site'	Consultation started April 2024 - not in for planning yet	150		5.49
TBC	East of Wain Estates site (north of Beamish Lane & south of the railway)	ALB021	Included in Shropshire Local Plan as a 'Proposed Housing Site'	Could be submitted for planning at any time	30		1.04
Shropshire Homes	Whiteacres site at end of Garridge Close	Whiteacres	21/05665/FUL	Planning application withdrawn Previously granted planning permission with conditions	24		
Taylor Wimpey	Land at Cross Road Corner of New House Lane	P36 / ALB014	Greenbelt - Included in Shropshire Local Plan as safeguarded for development beyond 2038	Proposed Safeguarded Land for development beyond 2038	160		6.98
TBC	Land bounded by Kingswood Road, High House Lane & Albrighton By-Pass	P35 (eastern portion)			150		6.32
TBC	Land between the Albrighton By-Pass and the Railway Line, north east of Albrighton	P32a			Likely for employment		6.56

**771** HOUSES  
TOTAL ALREADY IN  
SHROPSHIRE LOCAL  
PLAN



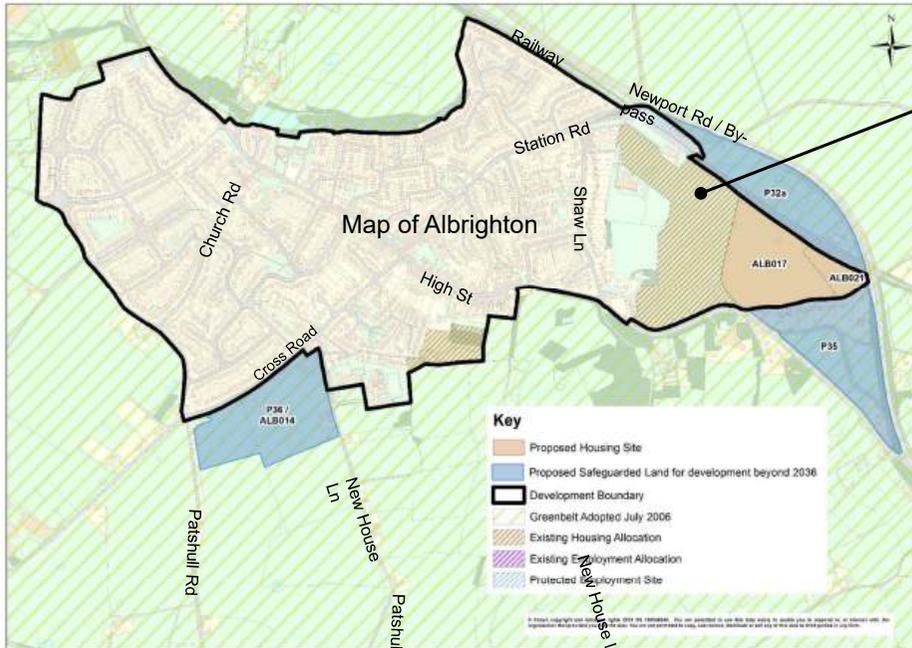
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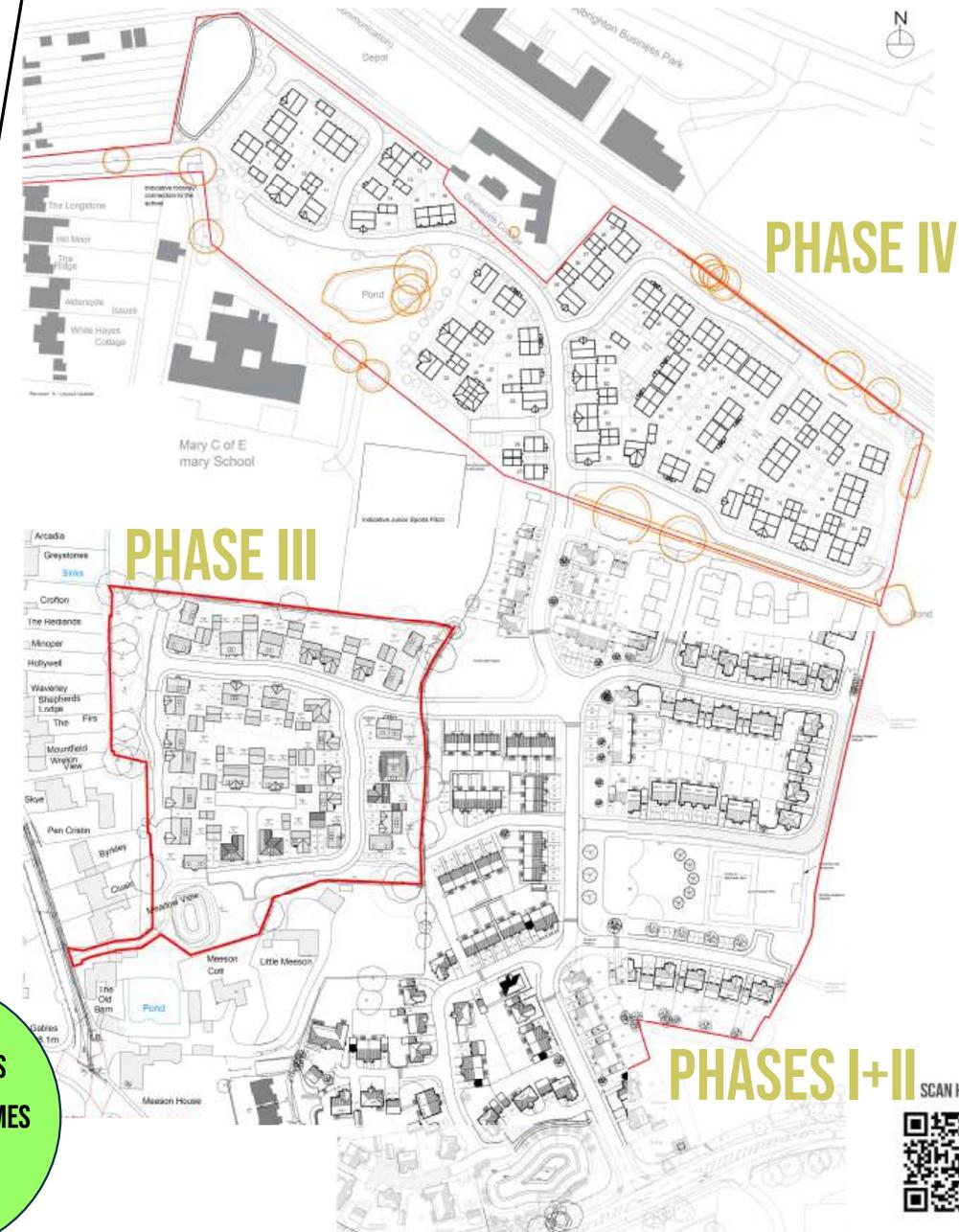
FOR DETAILS

# ALBRIGHTON'S EXISTING LOCAL PLAN HOUSING SITES

EXCLUDING BONINGALE HOMES ALBRIGHTON SOUTH PROPOSALS



## BONINGALE HOMES - MILLFIELDS



Name of development	Site reference	Planning reference	Status	Approximate number of houses	Site Area (Ha)	
Boningale Homes	Millfield Phase 1	Millfield	14/05456/REM (PHASE 1)	Built and sold	59	257 total Millfield
	Millfield Phase 2	Millfield	15/02448/FUL (PHASE 2A)	Built and sold	65	
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	Millfield Phase 4	Millfield	23/02095/OUT (PHASE 4)	Validated: Wed 17 May 2023 Status: Pending Consideration	90	
Wain Estates	Wain Estates Kingswood Road (east of Millfield)	ALB017	Included in Shropshire Local Plan as a 'Proposed Housing Site'	Consultation started April 2024 - not in for planning yet	150	5.48
TBC	East of Wain Estates site (north of Beamish Lane & south of the railway)	ALB021	Included in Shropshire Local Plan as a 'Proposed Housing Site'	Could be submitted for planning at any time	36	1.04
Shropshire Homes	Whiteacres site at end of Garridge Close	Whiteacres	21/05665/FUL	Planning application withdrawn Previously granted planning permission with conditions	24	
Taylor Wimpey	Land at Cross Road Corner of New House Lane	P36 / ALB014	Greenbelt - Included in Shropshire Local Plan as safeguarded for development beyond 2038	Proposed Safeguarded Land for development beyond 2038	160	0.96
TBC	Land bounded by Kingswood Road, High House Lane & Albrighton By-Pass	P35 (eastern portion)			150	0.8
TBC	Land between the Albrighton By-Pass and the Railway Line, north east of Albrighton	P32a			Likely for employment	

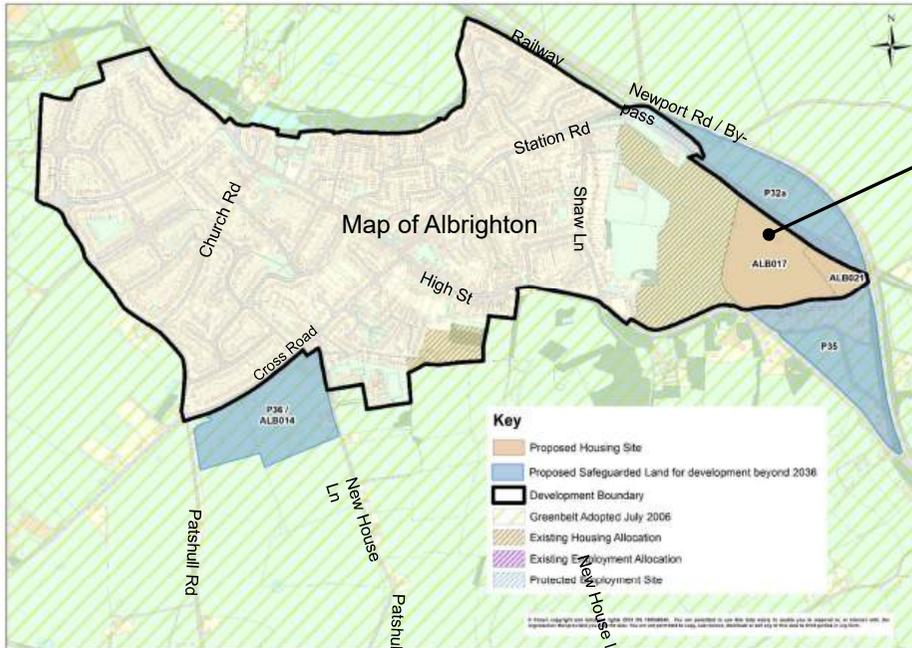
**257** HOUSES  
IN BONINGALE HOMES  
MILLFIELDS  
DEVELOPMENT



FOR DETAILS

# ALBRIGHTON'S EXISTING LOCAL PLAN HOUSING SITES

EXCLUDING BONINGALE HOMES ALBRIGHTON SOUTH PROPOSALS



## WAIN ESTATES ALB017



Name of development	Site reference	Planning reference	Status	Approximate number of houses	Site Area (Ha)	
Boningale Homes	Millfield Phase 1	Millfield	14/05456/REM (PHASE 1)	Built and sold	59	257 total Millfield
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TBC	Land bounded by Kingswood Road, High House Lane & Albrighton By-Pass	P35 (eastern portion)			150	6.32
TBC	Land between the Albrighton By-Pass and the Railway Line, north east of Albrighton	P32a			Likely for employment	6.50

**150 HOUSES**  
IN WAIN ESTATES  
PROPOSED  
DEVELOPMENT

“Wain Estates is developing plans for new homes on land at Kingswood Road, Albrighton.

In Albrighton there is a need for a wide range of housing for the local community. This development would provide around 150 new homes of which 20% would be affordable.

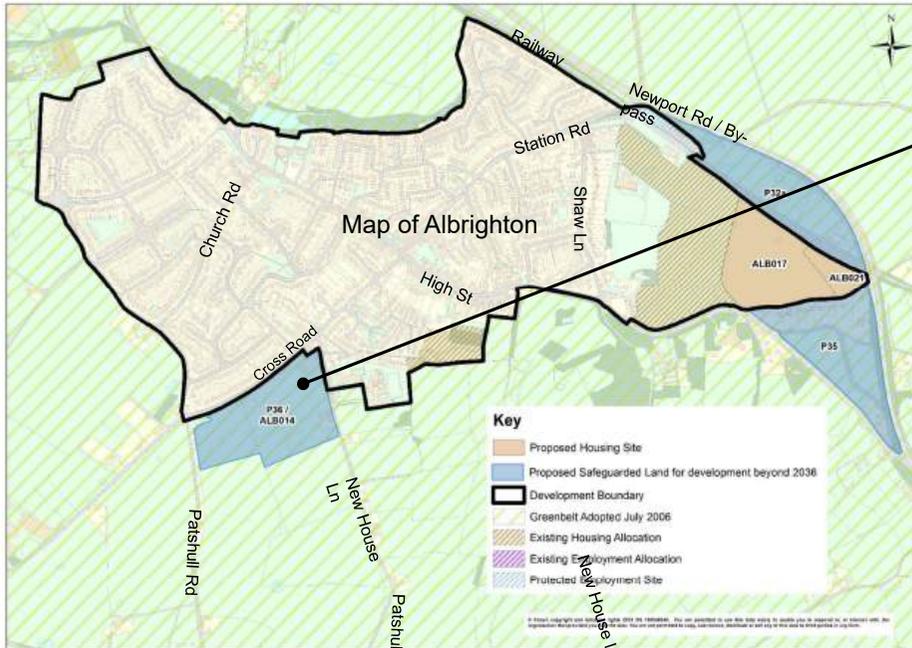
We are inviting the community to comment on the plans before finalising and submitting an outline planning application to Shropshire Council.”



FOR DETAILS

# ALBRIGHTON'S EXISTING LOCAL PLAN HOUSING SITES

EXCLUDING BONINGALE HOMES ALBRIGHTON SOUTH PROPOSALS



## CROSS RD - SAFEGUARDED LAND

P36 / ALB014



Layout proposed by Taylor Wimpey in 2017

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**160 HOUSES**  
**POTENTIAL ON CROSS RD SAFEGUARDED SITE AFTER 2038**

### WHAT IS SAFEGUARDED LAND?

Safeguarded Land is currently in Green Belt but is planned in the Shropshire Local Plan to be safeguarded for development after 2038 (not before). These are shown in blue on the plan.

The updated Local Plan Additional Material - Greenbelt Topic Paper states that "Planning permission for the permanent development of safeguarded land should only be granted...once allocated for development within a future Local Plan...to meet the needs of Shropshire"

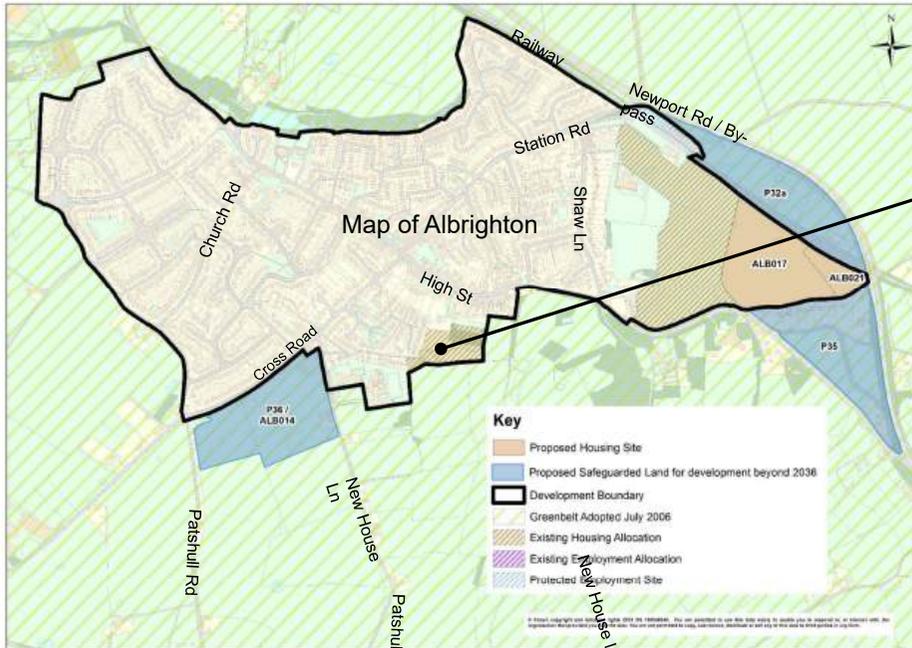
SCAN HERE



FOR DETAILS

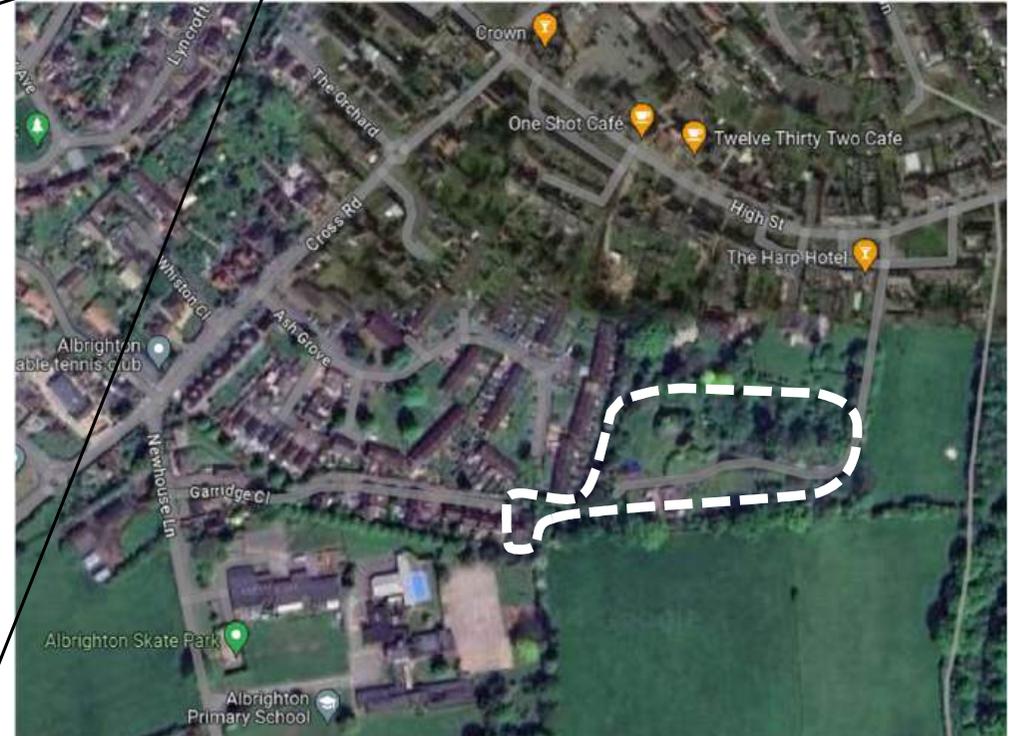
# ALBRIGHTON'S EXISTING LOCAL PLAN HOUSING SITES

EXCLUDING BONINGALE HOMES ALBRIGHTON SOUTH PROPOSALS



## WHITEACRES

END OF GARRIDGE CLOSE



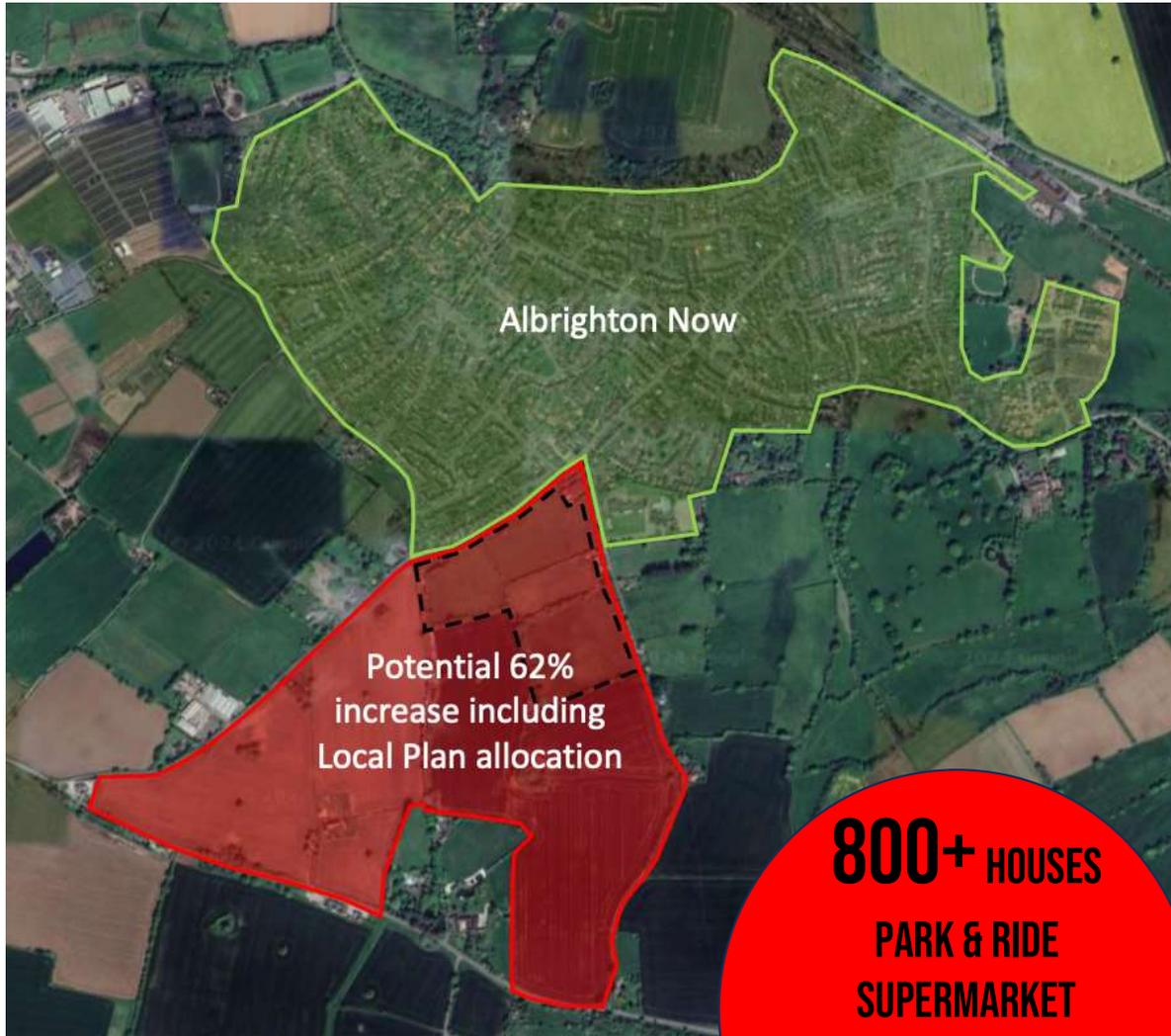
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TBC	Land between the Albrighton By-Pass and the Railway Line, north east of Albrighton	P32a			Likely for employment	6.50

### Note:

- This development was heavily opposed by residents
- Previously granted planning permission with conditions
- Planning application now withdrawn

**24** HOUSES  
IN SHROPSHIRE HOMES  
WHITEACRES SITE

# BONINGALE HOMES OVERDEVELOPMENT PROPOSALS FOR ALBRIGHTON SOUTH

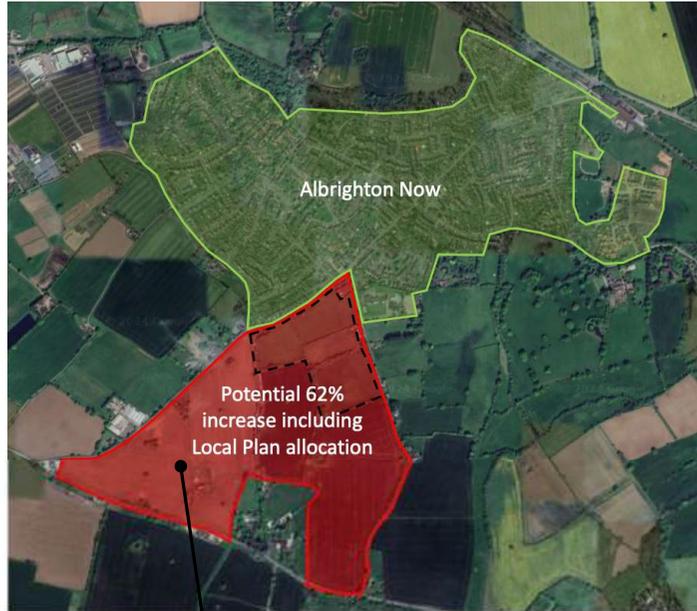


**NO!**  
**TO**  
**OVERDEVELOPMENT**

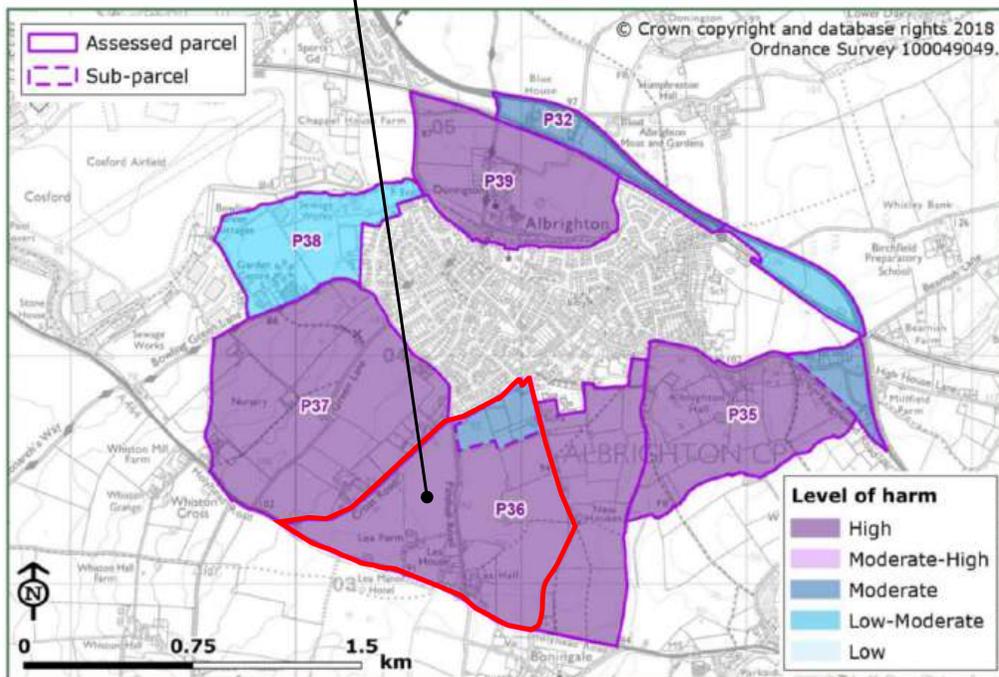
- ✗ NOT IN SHROPSHIRE LOCAL PLAN
- ✗ NOT NEEDED
- ✗ SEVERE NEGATIVE IMPACT ON VILLAGE

- ✓ ALBRIGHTON ALREADY HAS A SUSTAINABLE HOUSING PLAN
- ✓ SUPPORT THE SHROPSHIRE LOCAL PLAN CONSULTATION

# WHAT DOES THE SHROPSHIRE LOCAL PLAN SAY ABOUT BONINGALE HOMES PROPOSED SITE?



- ✓ IMPORTANT TO PRESERVE HISTORICAL SETTLEMENT AREA
- ✓ THERE ARE MORE APPROPRIATE SITES TO MEET BLACK COUNTRY NEED
- ✓ IT IS A SENSITIVE GREEN BELT PARCEL
- ✓ SITE NOT PROPOSED FOR INCLUSION IN LOCAL PLAN
- ✓ RETAIN AS GREENBELT
- ✗ NO POTENTIAL FOR ALLOCATION AS A HOUSING SITE
- ✗ NO POTENTIAL FOR WINDFALL HOUSING
- ✗ SIGNIFICANT ENCROACHMENT ON COUNTRYSIDE
- ✗ HIGH LEVEL OF HARM IF RELEASED FROM GREEN BELT
- ✗ SITE IS POORLY RELATED TO ALBRIGHTON



**NO!  
TO  
GREEN BELT GRAB**

SCAN HERE



FOR DETAILS

# HOW CAN YOU HELP OPPOSE BONINGALE HOMES PROPOSALS FOR ALBRIGHTON SOUTH?

1. VISIT THE ALBRIGHTON VILLAGE ACTION GROUP FACEBOOK & WEBSITE FOR DETAILS ON HOW TO...
2. SUPPORT THE CONSULTATION ON THE SHROPSHIRE COUNCIL LOCAL PLAN
3. DONATE TO JUSTGIVING TO HELP BUILD A WAR CHEST
4. SIGN THE PETITION OR E-PETITION
5. OPPOSE BONINGALE HOMES PLANNING APPLICATION WHEN IT IS SUBMITTED



**NO!**  
**TO**  
**GREEN BELT GRAB**

SCAN HERE



FOR DETAILS

ALBRIGHTONGREENBELT.CO.UK

**APPENDIX 5:**



- News
- Sport
- Entertainment
- Your World
- Submit Your Story
- Cost of living
- Local Hubs
- Crime
- Politics
- Health
- Business
- Education
- More** v

# Train timetable changes on major route to come into force in June

Several changes to train timetables are set to come into force at the start of next month.

By **Megan Jones** | Published May 22



Unmute

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and live on Freeview channel 276

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West Midlands Railway (WMR) is planning a number of timetable changes which will come into effect on Sunday, June 2.

The changes include an additional hourly service between Birmingham and Shrewsbury which will operate Monday to Saturday.

## Similar stories



**Road closures to be put in place as 100-year-old tree to finally get the chop**

Plus

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**Person 'cut out' after three-**

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Volvo Cars

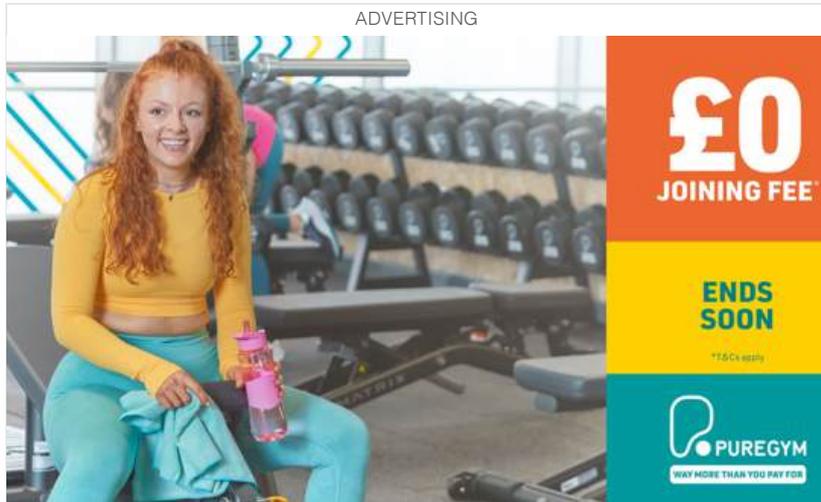
The new service will operate semi-fast, calling at Shifnal, Telford Central and Wellington, between Wolverhampton and Shrewsbury.

4.9% Finance Offer on all new SEAT & CUPRA

CLICK HERE SHREWSBURY

The existing WMR service will be diverted via Bescot, near Walsall, in readiness to serve new stations at Willenhall and Darlaston, which are expected to open in late 2025.

ADVERTISING



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PureGym - Sponsored

While the new service will reduce journey times to and from Birmingham for some passengers, the diversion means journey times from Bilbrook, Codsall, Albrighton, Cosford and Oakengates will be longer.



vehicle crash on A49 by junction for village

Transport | Just now



The major routes affected by roadworks over coming days - including eight on one road

Transport | Just now



Motorecycle rider suffered 'potentially serious injuries' in crash which closed major road

Oswestry | 2 hours ago



Why chancellor's comments will have drawn nervous glances from relief road supporters

Plus

Shrewsbury | 6 hours ago

Most popular

We visited Butlin's for the first time in 2024 - here's our honest family review

1

Plus

Entertainment | 18 hours ago

Horrified mother caught paedophile abusing her teenage daughter in woodland

2

Plus

Crime | 6 hours ago

Progress in plans for new 1,050-

There will also no longer be a direct regular connection between Smethwick Galton Bridge and Bilbrook, Codsall, Albrighton, Cosford and Oakengates.

The new timetables are available to view online at: [westmidlandsrailway.co.uk/june24](http://westmidlandsrailway.co.uk/june24)

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Volvo Cars | Sponsored

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New Energy Findings | Sponsored

### Why Intelligent Homeowners Are Replacing Their Boiler by August '24

UK homeowners are surprised with these boiler deals!

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### Millions of people could be owed huge car finance refund (Check your name)

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### Unbelievable: Calculator Shows The Value Of Your House Instantly (Take a Look)

search by your address to see your home's value instantly

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### When you'll have to start paying for garden waste collection in Shropshire

3

### home village near Bridgnorth four years after scheme unveiled

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4

### Road closures to be put in place as 100-year-old tree to finally get the chop

Plus

[Bridgnorth](#) | 6 hours ago

5

### Popular village pub and cafe to undergo transformation as menu and appearances change

Plus

[Shrewsbury](#) | 6 hours ago

Shropshire Star

### Residents up in arms over plans to build new homes on pub car park

Shropshire Star

### New Neuropathy Device Leaves Experts Speechless (I...

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### Ranked: The best and worst GP surgeries in Shropshire based on patients' experiences

The best and worst GP surgeries in Shropshire and Telford and Wrekin according to patients' experiences have been revealed.

### 'Suspicious' vehicle seen in south Shropshire village - police appeal for information

Two young males were seen driving slowly around a village and appeared to be looking at properties and vehicles in south Shropshire, say police as...

### Horrified mother caught paedophile abusing her teenage daughter in woodland

Shropshire Star

### 'Selfish, jealous and controlling' husband assaulted wife and forced her to sleep in van

Shropshire Star

### This Is Why You Must Install Solar Panels Before...

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# 2nd June

[Home](#) > [Travel information](#) > [Service disruption](#) >

Timetable Change: Sunday 2nd June

Timetables have changed on **Sunday 2nd June**. Please see below a summary of the changes.

## Your timetables

Timetables have been added to our timetable webpage and can be viewed on our website, app, or the National Rail Journey Planner.

[View & print timetables](#)[Check times on our app](#)[National Rail Journey Planner](#)

## Summary of timetable changes

Below is a summary of the changes. For full timetables, visit our [timetables webpage](#) .

### Birmingham - Shrewsbury

- We have introduced an additional hourly service between Birmingham and Shrewsbury which will operate Monday - Saturday.
- The existing service will be diverted via Bescot, in readiness to serve new stations at Willenhall and Darlaston, which are expected to open in late 2025.
- The new service will operate semi-fast, calling at Shifnal, Telford Central and Wellington, between Wolverhampton and Shrewsbury.
- This will provide a faster service to these key Shropshire towns, reducing journey times to and from Birmingham

- Journey times between Wolverhampton and Walsall will also be reduced (via a connection at Tame Bridge Parkway).
- Journey times from Bilbrook, Codsall, Albrighton, Cosford and Oakengates will be longer, and departure times will also change from the previous timetable.
- There will also no longer be a direct regular connection between Smethwick Galton Bridge and Bilbrook, Codsall, Albrighton, Cosford and Oakengates.

## Snow Hill Lines



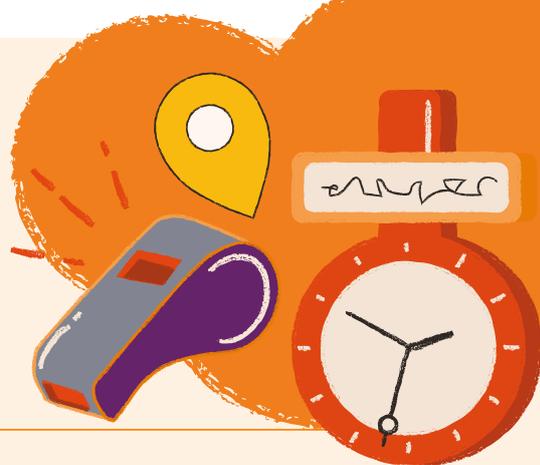
- We have amended the calling patterns of Kidderminster and Worcester terminating services which operate Monday - Saturday.
- Services terminating at Kidderminster will now routinely call at Langley Green, Old Hill and Lye - but will no longer call at Hagley and Blakedown.
- Services terminating in Worcester will now call routinely call at Hagley and Blakedown - but will no longer call at Langley Green, Old Hill and Lye.
- Stourbridge Town shuttle services will be slightly amended to align with new timings of services at Stourbridge Junction.
- Passengers will be able to travel directly between Worcester and Hagley or Blakedown.
- Passengers travelling between Worcester and Langley Green, Old Hill or Lye will need to change services at Kidderminster.

We are keen to know your thoughts so please [take part in our latest timetable travel survey](#)  .

For a summary of what's changed on London Northwestern Railway routes - click [here](#)  .

Valid from 2 June until 14 December 2024

# Train times



## 6 Shrewsbury to Birmingham New Street

Shrewsbury – Telford – Wolverhampton – Birmingham



### National Rail Enquiries

03457 48 49 50  
nationalrail.co.uk

### Live travel updates

✕ @WestMidRailway  
For help, advice and travel updates

f /WestMidsRailway

📷 @westmidlandsrailway  
For the latest offers and news



## Useful information

### Plan online

To make sure you have the most accurate train times, it's always best to plan your journey using a journey planner. We have them on our website and app, at our staffed stations and over the phone.

### Bring your bike

There is space for at least one bike onboard our services, and you do not need to make a reservation in advance. These are allocated on a first come, first served basis, and if the train is quiet, the Senior Conductor may allow more bikes onboard.

### Travelling with a bike to or from London Euston?

Please be aware that on weekdays, only folding bikes are allowed on trains arriving at London Euston between 0700–1000, and departing between 1600–1900.

### Getting assistance at the station

We can help with planning your journey, getting on and off our trains, moving around the station, assisting with luggage and purchasing tickets. Call us on 0800 024 8998 or use the Passenger Assist app and we'll make the arrangements. We recommend that you book at least two hours before your journey - this ensures our staff can offer you the best service and notify you if anything is likely to disrupt your journey.

### Before you travel

We may be required to make some changes to the timetable, therefore we would recommend that you check your journey before travelling. You can check train times on the WMR app, at [wmr.uk/plan](http://wmr.uk/plan), or by calling National Rail Enquiries on 03457 48 49 50.

### On The Rails Podcast

In our podcast, we discuss a variety of topics, from timing ticket purchases perfectly to top travel tips, as well as conversations with colleagues and celebrity guests. Please visit [wmr.uk/podcast](http://wmr.uk/podcast) to listen.

### West Midlands Railway Customer Relations

You can get in touch with our customer relations team between 0700–1900 on weekdays, and 0800–1600 at weekends.

web: [wmr.uk/contact-us](http://wmr.uk/contact-us)  
tel: 0333 311 0039 (standard call rates)  
post: Freepost West Midlands Railway Customer Relations  
facebook: [/WestMidsRailway](https://www.facebook.com/WestMidsRailway)  
x: [@WestMidRailway](https://twitter.com/WestMidRailway)

### Transport Focus

web: [transportfocus.org.uk](http://transportfocus.org.uk)  
email: [advice@transportfocus.org.uk](mailto:advice@transportfocus.org.uk)  
x: [@transportfocus](https://twitter.com/transportfocus)  
tel: 0300 123 2350  
post: Freepost TRANSPORT FOCUS  
77 Timothys Bridge Road  
Stratford Enterprise Park  
STRATFORD-UPON-AVON  
CV37 9BG

### Improvement works

From time to time it is essential to undertake improvement works. Everyone's journey is different – please check before you travel, especially if you are travelling late at night or at the weekend. The latest updated information is available at [nationalrail.co.uk](http://nationalrail.co.uk)

### Off-Peak travel

Certain Off-Peak tickets are not valid on services departing London Euston 1649–1900 or departing Birmingham 1635–1800 Mondays to Fridays. Please check before you travel.

### Bank Holidays

Generally, a Saturday level of service applies on Bank Holidays, except for Christmas Day and Boxing Day. Please double check ahead of each bank holiday at [wmr.uk/plan](http://wmr.uk/plan).

Valid from 3 June until 13 December 2024

Mondays to Fridays

	TfW																										
➔ Birmingham International d			0708		0808		0908		1008		1108		1208		1308		1408										
➔ Birmingham New St d	0556	0622	0652	0722	0729	0752	0822	0826	0852	0922	0926	0952	1022	1026	1052	1122	1126	1152	1222	1226	1252	1323	1326	1352	1422	1426	
➔ Smethwick Galton Bridge d	0603	↓	0659	↓	0759	↓	0859	↓	0959	↓	1059	↓	1159	↓	1259	↓	1359	↓	1459	↓	1559	↓	1659	↓	1759	↓	
➔ Sandwell & Dudley d	↓	0630	↓	0730	↓	0830	↓	0930	↓	1030	↓	1130	↓	1230	↓	1330	↓	1430	↓	1530	↓	1630	↓	1730	↓	1830	↓
➔ Tame Bridge Parkway d	↓	↓	0744	↓	0841	↓	0941	↓	1041	↓	1141	↓	1241	↓	1341	↓	1441	↓	1541	↓	1641	↓	1741	↓	1841	↓	
➔ Wolverhampton d	0615	0642	0711	0741	0759	0812	0841	0858	0912	0941	0958	1012	1041	1058	1112	1141	1158	1212	1241	1258	1312	1342	1358	1412	1441	1458	
➔ Bilbrook d	0621	↓	0717	↓	0805	↓	0904	↓	1004	↓	1104	↓	1204	↓	1304	↓	1404	↓	1504	↓	1604	↓	1704	↓	1804	↓	
➔ Codrall d	0624	↓	0720	↓	0808	↓	0907	↓	1007	↓	1107	↓	1207	↓	1307	↓	1407	↓	1507	↓	1607	↓	1707	↓	1807	↓	
➔ Albrighton d	0629	↓	0725	↓	0813	↓	0912	↓	1012	↓	1112	↓	1212	↓	1312	↓	1412	↓	1512	↓	1612	↓	1712	↓	1812	↓	
➔ Cosford d	0632	↓	0728	↓	0816	↓	0915	↓	1015	↓	1115	↓	1215	↓	1315	↓	1415	↓	1515	↓	1615	↓	1715	↓	1815	↓	
➔ Shifnal d	0637	↓	0733	↓	0821	0827	↓	0920	0926	↓	1020	1026	↓	1120	1126	↓	1220	1226	↓	1320	1326	↓	1420	1426	↓	1520	
➔ Telford Central d	0642	0659	0738	0759	0826	0832	0858	0925	0932	0958	1025	1032	1058	1125	1132	1158	1225	1232	1259	1325	1332	1400	1425	1432	1459	1525	
➔ Oakengates d	0645	↓	0741	↓	0828	↓	0928	↓	1028	↓	1128	↓	1228	↓	1328	↓	1428	↓	1528	↓	1628	↓	1728	↓	1828	↓	
➔ Wellington d	0651	0707	0747	0808	0834	0840	0906	0934	0940	1006	1034	1040	1106	1134	1140	1206	1234	1240	1307	1334	1340	1408	1434	1440	1507	1534	
➔ Shrewsbury a	0705	0722	0800	0823	0847	0853	0921	0947	0953	1020	1047	1053	1120	1147	1153	1220	1247	1259	1321	1347	1353	1422	1447	1454	1521	1547	

	TfW																									
➔ Birmingham International d	1508		1607		1708		1808		1908		2008		2109		2316											
➔ Birmingham New St d	1452	1522	1526	1552	1622	1626	1652	1721	1726	1752	1822	1826	1852	1922	2004	2022	2052	2122	2152	2256	2340					
➔ Smethwick Galton Bridge d	1459	↓	1559	↓	1659	↓	1759	↓	1859	↓	1959	↓	2059	↓	2159	↓	2303	↓	2348	↓	0002					
➔ Sandwell & Dudley d	↓	1530	↓	1630	↓	1730	↓	1830	↓	1930	↓	2030	↓	2130	↓	2348	↓	0002								
➔ Tame Bridge Parkway d	↓	↓	1541	↓	1641	↓	1742	↓	1841	↓	1941	↓	2041	↓	2141	↓	2348	↓	0002							
➔ Wolverhampton d	1512	1541	1558	1612	1641	1658	1712	1741	1758	1812	1841	1858	1912	1941	2023	2041	2112	2141	2212	2315	0002					
➔ Bilbrook d	↓	↓	1604	↓	1704	↓	1804	↓	1904	↓	2029	↓	2119	↓	2219	↓	2321	↓	0009							
➔ Codrall d	↓	↓	1607	↓	1707	↓	1807	↓	1907	↓	2032	↓	2121	↓	2221	↓	2324	↓	0011							
➔ Albrighton d	↓	↓	1612	↓	1712	↓	1812	↓	1912	↓	2037	↓	2126	↓	2226	↓	2329	↓	0016							
➔ Cosford d	↓	↓	1615	↓	1715	↓	1815	↓	1915	↓	2040	↓	2130	↓	2230	↓	2332	↓	0020							
➔ Shifnal d	1526	↓	1620	1626	↓	1720	1726	↓	1820	1826	↓	1920	1935	↓	2045	↓	2135	↓	2235	2337	0025					
➔ Telford Central d	1532	1558	1625	1632	1659	1725	1732	1759	1825	1832	1900	1925	1940	1959	2050	2059	2140	2159	2240	2342	0031					
➔ Oakengates d	↓	↓	1628	↓	1728	↓	1828	↓	1928	↓	2053	↓	2143	↓	2243	↓	2345	↓	0034							
➔ Wellington d	1540	1606	1634	1640	1707	1734	1740	1807	1834	1840	1908	1934	1949	2007	2059	2107	2149	2207	2249	2351	0040					
➔ Shrewsbury a	1553	1620	1647	1654	1722	1748	1753	1821	1847	1853	1922	1947	2002	2022	2113	2121	2203	2224	2302	0005	0055					

Valid from 8 June until 14 December 2024

Saturdays

	TfW																										
➔ Birmingham International d			0709		0808		0908		1008		1108		1208		1308		1408										
➔ Birmingham New St d	0556	0622	0626	0722	0729	0822	0826	0852	0922	0926	0952	1022	1026	1052	1122	1126	1152	1222	1226	1252	1322	1326	1352	1423	1426	1452	
➔ Smethwick Galton Bridge d	0603	↓	0659	↓	0759	↓	0859	↓	0959	↓	1059	↓	1159	↓	1259	↓	1359	↓	1459	↓	1559	↓	1659	↓	1759	↓	
➔ Sandwell & Dudley d	↓	0630	↓	0730	↓	0830	↓	0930	↓	1030	↓	1130	↓	1230	↓	1330	↓	1431	↓	1531	↓	1631	↓	1731	↓	1831	↓
➔ Tame Bridge Parkway d	↓	↓	0641	↓	0744	↓	0841	↓	0941	↓	1041	↓	1141	↓	1241	↓	1341	↓	1441	↓	1541	↓	1641	↓	1741	↓	
➔ Wolverhampton d	0615	0641	0658	0741	0759	0841	0858	0912	0941	0958	1012	1041	1058	1112	1141	1158	1212	1241	1258	1312	1341	1358	1412	1442	1458	1512	
➔ Bilbrook d	0621	↓	0704	↓	0805	↓	0904	↓	1004	↓	1104	↓	1204	↓	1304	↓	1404	↓	1504	↓	1604	↓	1704	↓	1804	↓	
➔ Codrall d	0624	↓	0707	↓	0808	↓	0907	↓	1007	↓	1107	↓	1207	↓	1307	↓	1407	↓	1507	↓	1607	↓	1707	↓	1807	↓	
➔ Albrighton d	0629	↓	0712	↓	0813	↓	0912	↓	1012	↓	1112	↓	1212	↓	1312	↓	1412	↓	1512	↓	1612	↓	1712	↓	1812	↓	
➔ Cosford d	0632	↓	0715	↓	0816	↓	0915	↓	1015	↓	1115	↓	1215	↓	1315	↓	1415	↓	1515	↓	1615	↓	1715	↓	1815	↓	
➔ Shifnal d	0637	↓	0720	↓	0821	↓	0920	0926	↓	1020	1026	↓	1120	1126	↓	1220	1226	↓	1320	1326	↓	1420	1426	↓	1520	1526	
➔ Telford Central d	0642	0659	0725	0758	0826	0859	0925	0932	0958	1025	1032	1058	1125	1132	1158	1225	1232	1259	1325	1332	1358	1425	1432	1459	1525	1532	
➔ Oakengates d	0645	↓	0728	↓	0828	↓	0928	↓	1028	↓	1128	↓	1228	↓	1328	↓	1428	↓	1528	↓	1628	↓	1728	↓	1828	↓	
➔ Wellington d	0651	0707	0734	0806	0834	0907	0934	0940	1005	1034	1040	1106	1134	1140	1206	1234	1240	1307	1334	1340	1406	1434	1440	1507	1534	1540	
➔ Shrewsbury a	0705	0721	0747	0820	0847	0922	0948	0953	1019	1047	1053	1122	1147	1153	1220	1247	1255	1321	1347	1357	1421	1447	1456	1521	1547	1555	

	TfW																		
➔ Birmingham International d	1508		1608		1708		1808		1908		2008		2108						
➔ Birmingham New St d	1522	1526	1552	1622	1626	1652	1722	1726	1752	1822	1826	1852	1922	1926	1952	2022	2026	2052	2122

Valid from 2 June  
until 8 December 2024

Sundays

		TfW																										
									A	B																		
→ Birmingham International	d	1006	1108	1208	1308	1407	1408	1509	1609	1709	1809	1911	2010	2108														
→ Birmingham New St	d	0825	0956	1022	1056	1122	1156	1222	1256	1322	1356	1421	1422	1456	1522	1556	1622	1656	1722	1756	1822	1856	1924	2004	2023	2056	2122	
→ Smethwick Galton Bridge	d	0832	1002	1103	1203	1303	1403	1503	1603	1703	1803	1903	2011	2103														
→ Sandwell & Dudley	d		1030	1130	1230	1330	1429	1430	1530	1630	1730	1830	1932	2031	2130													
Tame Bridge Parkway	d																											
→ Wolverhampton	d	0844	1014	1041	1114	1141	1214	1241	1314	1341	1414	1442	1443	1514	1543	1614	1643	1714	1743	1814	1843	1914	1943	2023	2042	2114	2141	
Bilbrook	d	0851	1021	1121	1221	1321	1421	1521	1621	1721	1821	1921	2029	2121														
Codsall	d	0853	1023	1123	1223	1323	1423	1523	1623	1723	1823	1923	2032	2123														
Albrighton	d	0858	1028	1128	1228	1328	1428	1528	1628	1728	1828	1928	2037	2128														
Cosford	d	0902	1032	1132	1232	1332	1432	1532	1632	1732	1832	1932	2040	2132														
Shifnal	d	0907	1037	1137	1237	1337	1437	1537	1637	1737	1837	1937	2045	2137														
→ Telford Central	d	0912	1042	1059	1142	1159	1242	1258	1342	1358	1442	1459	1500	1542	1601	1642	1700	1742	1800	1842	1900	1942	2000	2050	2100	2142	2158	
Oakengates	d	0915	1045	1145	1245	1345	1445	1545	1645	1745	1845	1945	2053	2145														
→ Wellington	d	0921	1051	1106	1151	1207	1251	1306	1351	1405	1451	1507	1508	1551	1609	1651	1708	1751	1808	1851	1908	1951	2008	2059	2107	2151	2206	
→ Shrewsbury	a	0934	1105	1121	1205	1222	1305	1321	1405	1419	1505	1521	1522	1605	1625	1705	1723	1805	1822	1905	1922	2005	2022	2113	2121	2206	2220	

TfW TfW TfW

→ Birmingham International	d	2211	2240	2307	
→ Birmingham New St	d	2207	2224	2255	2325
→ Smethwick Galton Bridge	d	2214			
→ Sandwell & Dudley	d	2232	2304	2333	
Tame Bridge Parkway	d				
→ Wolverhampton	d	2228	2244	2316	2349
Bilbrook	d	2235		2355	
Codsall	d	2237		2357	
Albrighton	d	2242		0002	
Cosford	d	2246		0005	
Shifnal	d	2251		0010	
→ Telford Central	d	2256	2303	0017	
Oakengates	d	2259		0019	
→ Wellington	d	2305	2311	0025	
→ Shrewsbury	a	2318	2327	2348	0040

Notes & Symbols

- PlusBus add-on tickets available
- Connection with West Midlands Metro

- a Arrival time
- d Departure time

All services operated by West Midlands Railway unless otherwise shown

- A Runs from 15 September
- B Runs until 8 September

TfW Service operated by Transport for Wales

Valid from 3 June  
until 13 December 2024

Mondays to Fridays

		TFW																									
Shrewsbury	d	0518	0540	0610	0630	0651	0710	0730	0757	0805	0832	0859	0905	0930	0959	1005	1029	1059	1105	1130	1159	1205	1234	1259	1305	1330	1359
Wellington	d	0532	0553	0623	0644	0704	0723	0744	0812	0818	0846	0912	0918	0944	1012	1018	1043	1112	1118	1144	1212	1218	1247	1312	1318	1344	1412
Oakengates	d	0559	0629		0729				0823			0923			1023			1123			1223			1323			
Telford Central	d	0538	0602	0632	0651	0710	0732	0751	0818	0826	0853	0918	0926	0951	1018	1026	1051	1118	1126	1151	1218	1226	1253	1318	1326	1351	1418
Shifnal	d	0607	0637		0715	0737			0823	0831		0923	0931		1023	1031		1123	1131		1223	1231		1323	1331		1423
Cosford	d	0612	0642		0742				0836			0936			1036			1136			1236			1336			
Albrighton	d	0615	0645		0745				0839			0939			1039			1139			1239			1339			
Codsall	d	0620	0650		0750				0844			0944			1044			1144			1244			1344			
Bilbrook	d	0623	0653		0753				0847			0947			1047			1147			1247			1347			
Wolverhampton	a	0555	0630	0700	0710	0730	0800	0810	0838	0854	0911	0938	0954	1010	1038	1054	1110	1138	1154	1209	1238	1254	1311	1338	1354	1410	1438
Tame Bridge Parkway	a				0717				0910			1009			1109			1209			1309			1410			
Sandwell & Dudley	a	0604			0720			0820			0920			1020			1120			1218			1320			1420	
Smethwick Galton Bridge	a	0643			0743			0852			0952			1052			1152			1252			1352			1452	
Birmingham New St	a	0616	0653	0734	0732	0752	0821	0832	0900	0926	0931	1000	1026	1032	1100	1126	1132	1200	1226	1232	1300	1326	1332	1400	1426	1432	1500
Birmingham International	a	0650			0752			0852			0952			1052			1152			1252			1352			1452	

		TFW	FX	FO	TFW	TFW	TFW	TFW																			
Shrewsbury	d	1405	1432	1459	1505	1531	1559	1605	1634	1659	1705	1728	1759	1805	1831	1905	1930	2005	2105	2130	2132	2200	2230	2240			
Wellington	d	1418	1446	1512	1518	1545	1612	1618	1647	1712	1718	1742	1812	1818	1845	1918	1944	2018	2118	2144	2146	2213	2244	2253			
Oakengates	d	1423			1523				1623			1723			1823			2023	2123			2218		2259			
Telford Central	d	1426	1453	1518	1526	1552	1618	1626	1653	1718	1726	1749	1818	1826	1852	1926	1951	2026	2126	2151	2153	2221	2251	2302			
Shifnal	d	1431		1523	1531		1623	1631		1723	1731		1823	1831		1931		2031	2131			2226		2307			
Cosford	d	1436			1536			1636			1736			1836		1936		2036	2136			2231		2312			
Albrighton	d	1439			1539			1639			1739			1839		1939		2039	2139			2234		2315			
Codsall	d	1444			1544			1644			1744			1844		1944		2044	2144			2239		2320			
Bilbrook	d	1447			1547			1647			1747			1847		1947		2047	2147			2242		2323			
Wolverhampton	a	1454	1511	1538	1554	1609	1638	1654	1710	1738	1754	1809	1838	1854	1911	1954	2009	2054	2154	2210	2212	2249	2308	2332			
Tame Bridge Parkway	a	1509			1609			1709			1809			1910		2009		2109	2209			2306		2319			
Sandwell & Dudley	a	1520			1620			1720			1820			1921		2020		2120	2221	2221		2319		2343			
Smethwick Galton Bridge	a	1526	1532	1600	1626	1632	1700	1726	1732	1800	1826	1832	1900	1926	1932	2026	2032	2127	2226	2235	2235	2321	2332	2351			
Birmingham New St	a	1526	1532	1600	1626	1632	1700	1726	1732	1800	1826	1832	1900	1926	1932	2026	2032	2127	2226	2235	2235	2321	2332	2351			
Birmingham International	a	1553			1653			1753			1852			1952		2052		2152	2252	2252		2351		2357			

Valid from 8 June  
until 14 December 2024

Saturdays

		TFW																									
Shrewsbury	d	0522	0540	0610	0630		0710	0730		0805	0830	0859	0905	0930	0959	1005	1033	1059	1105	1133	1159	1205	1233	1259	1305	1332	1359
Wellington	d	0536	0553	0623	0644		0723	0744		0818	0844	0912	0918	0944	1012	1018	1047	1112	1118	1147	1212	1218	1247	1312	1318	1346	1412
Oakengates	d	0559	0629		0729					0823		0923			1023			1123			1223			1323			
Telford Central	d	0543	0602	0632	0651		0732	0751		0826	0851	0918	0926	0951	1018	1026	1054	1118	1126	1154	1218	1226	1254	1318	1326	1353	1418
Shifnal	d	0607	0637		0737					0831		0923	0931		1023	1031		1123	1131		1223	1231		1323	1331		1423
Cosford	d	0612	0642		0742					0836		0936			1036			1136			1236			1336			
Albrighton	d	0615	0645		0745					0839		0939			1039			1139			1239			1339			
Codsall	d	0620	0650		0750					0844		0944			1044			1144			1244			1344			
Bilbrook	d	0623	0653		0753					0847		0947			1047			1147			1247			1347			
Wolverhampton	a	0601	0631	0700	0710	↔	0800	0810	↔	0854	0911	0938	0954	1010	1038	1054	1111	1138	1154	1212	1238	1254	1311	1338	1354	1410	1438
Tame Bridge Parkway	a				0718			0818		0909		1009			1109			1209			1309			1409			
Sandwell & Dudley	a	0610		↔	0720		↔	0820		0920		1020			1120			1221			1321			1420			
Smethwick Galton Bridge	a	0643			0743			0843		0943		1043			1143			1243			1343			1443			
Birmingham New St	a	0622	0653		0731	0738		0832	0837	0926	0932	1000	1026	1032	1100	1126	1131	1200	1226	1232	1300	1326	1332	1400	1426	1432	1500
Birmingham International	a	0650			0752			0852			0953			1052			1154			1253			1354			1452	

		TFW																									
Shrewsbury	d	1405	1431	1459	1505	1533	1559	1605	1634	1659	1705	1730	1759	1805	1831	1859	1905	1930	1959	2005	2059	2105	2130	2205	2230	2240	2259
Wellington	d	1418	1445	1512	1518	1547	1612	1618	1647	1712	1718	1744	1812	1818	1845	1912	1918	1944	2012	2018	2112	2118	2144	2218	2244	2253	2312
Oakengates	d	1423			1523				1623			1723			1823	</											

Valid from 2 June  
until 8 December 2024

Sundays

	TfW																									
Shrewsbury d	0809	0840	0917	0940	1030	1040	1133	1140	1232	1240	1330	1340	1430	1440	1531	1540	1631	1640	1730	1740	1831	1840	1930	1940	2033	2040
Wellington d	0823	0853	0931	0953	1044	1053	1147	1153	1246	1253	1344	1353	1444	1453	1545	1553	1645	1653	1744	1753	1845	1853	1944	1953	2047	2053
Oakengates d	▼	0859	▼	0959	▼	1059	▼	1159	▼	1259	▼	1359	▼	1459	▼	1559	▼	1659	▼	1759	▼	1859	▼	1959	▼	2059
Telford Central d	0830	0902	0938	1002	1051	1102	1154	1202	1254	1302	1351	1402	1451	1502	1552	1602	1652	1702	1751	1802	1852	1902	1951	2002	2054	2102
Shifnal d	▼	0907	▼	1007	▼	1107	▼	1207	▼	1307	▼	1407	▼	1507	▼	1607	▼	1707	▼	1807	▼	1907	▼	2007	▼	2107
Cosford d	▼	0912	▼	1012	▼	1112	▼	1212	▼	1312	▼	1412	▼	1512	▼	1612	▼	1712	▼	1812	▼	1912	▼	2012	▼	2112
Albrighton d	▼	0915	▼	1015	▼	1115	▼	1215	▼	1315	▼	1415	▼	1515	▼	1615	▼	1715	▼	1815	▼	1915	▼	2015	▼	2115
Codsall d	▼	0920	▼	1020	▼	1120	▼	1220	▼	1320	▼	1420	▼	1520	▼	1620	▼	1720	▼	1820	▼	1920	▼	2020	▼	2120
Bilbrook d	▼	0923	▼	1023	▼	1123	▼	1223	▼	1323	▼	1423	▼	1523	▼	1623	▼	1723	▼	1823	▼	1923	▼	2023	▼	2123
Wolverhampton a	0848	0931	0957	1031	1109	1131	1212	1231	1311	1331	1409	1431	1508	1531	1609	1631	1709	1731	1809	1831	1910	1931	2010	2031	2113	2131
Tame Bridge Parkway a	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Sandwell & Dudley a	0857	▼	1005	▼	1120	▼	1221	▼	1321	▼	1420	▼	1520	▼	1620	▼	1720	▼	1820	▼	1920	▼	2020	▼	2122	▼
Smethwick Galton Bridge a	▼	0943	▼	1043	▼	1143	▼	1243	▼	1343	▼	1443	▼	1543	▼	1643	▼	1743	▼	1843	▼	1943	▼	2043	▼	2143
Birmingham New St a	0909	0951	1017	1051	1132	1151	1232	1251	1332	1351	1432	1451	1532	1551	1632	1651	1731	1751	1832	1851	1932	1951	2032	2051	2133	2151
Birmingham International a	0930	1034	1151	1252	1351	1452	1551	1655	1752	1851	1952	2052	2150													

TfW TfW TfW

Shrewsbury d	2120	2133	2154	2223
Wellington d	▼	2147	2207	2237
Oakengates d	▼	2212	2241	
Telford Central d	▼	2154	2215	2245
Shifnal d	▼	2220	2251	
Cosford d	▼	2225	2256	
Albrighton d	▼	2229	2259	
Codsall d	▼	2234	2304	
Bilbrook d	▼	2237	2306	
Wolverhampton a	2153	2212	2244	2314
Tame Bridge Parkway a	▼	▼	▼	
Sandwell & Dudley a	2201	2221	▼	
Smethwick Galton Bridge a	▼	▼	2255	
Birmingham New St a	2212	2232	2304	
Birmingham International a	2231	2249		

Notes & Symbols

- PlusBus add-on tickets available
- Connection with West Midlands Metro
- a Arrival time
- d Departure time

All services operated by West Midlands Railway unless otherwise shown

TfW Service operated by Transport for Wales

<b>Route 891</b>		<b>Banga Buses</b>		<b>Monday - Friday</b>					
<b>Wolverhampton</b>	<b>0615 0725 - 0825 0925</b>	<b>1025 1115 1215 1325</b>	<b>1425 1535 1635</b>						
<b>Tettenhall</b>	<b>0627 0737 - 0837 0937</b>	<b>1037 1130 1230 1337</b>	<b>1437 1552 1652</b>						
<b>Albrighton crown</b>	<b>0638 0748 - 0848 0948</b>	<b>1048 1141 1241 1348</b>	<b>1448 1603 1703</b>						
<b>Cosford garage</b>	<b>0642 0752 - 0852 0952</b>	<b>1052 1145 1245 1352</b>	<b>1452 1607 1707</b>						
<b>Shifnal victoria rd</b>	<b>0655 0805 - 0905 1005</b>	<b>1105 1155 1255 1405</b>	<b>1505 1620 1720</b>						
<b>Stafford Park</b>	<b>0705 0815 - 0915 1015</b>	<b>1115 1415</b>	<b>1515 1626 1726</b>						
<b>Telford</b>	<b>0714 0822 - 0922 1022</b>	<b>1122 1205 1305 1422</b>	<b>1522 1633 1733</b>						

<b>Return Depart</b>								<b>*</b>	<b>*</b>
<b>Telford</b>	<b>0715 0825 - 0925 1025</b>	<b>1125 1210 1310 1425</b>	<b>1525 1635 1735</b>						
<b>Stafford Park</b>	<b>0720 0830 - 0930 1030</b>	<b>1130 - 1430</b>	<b>1530 1640 1740</b>						
<b>Shifnal victoria rd</b>	<b>0730 0837 - 0937 1037</b>	<b>1137 1220 1320 1437</b>	<b>1537 1647 1747</b>						
<b>Shifnal Drayton</b>									
<b>Cosford garage</b>	<b>0745 0851 - 0951 1051</b>	<b>1151 1233 1333 1451</b>	<b>1551 1703 1803</b>						
<b>Albrighton</b>	<b>0750 0855 - 0955 1055</b>	<b>1155 1237 1337 1455</b>	<b>1555 1707 1807</b>						
<b>Tettenhall</b>	<b>0800 0903 - 1003 1103</b>	<b>1203 1243 1343 1503</b>	<b>1603 1715 1815</b>						
<b>Wolverhampton</b>	<b>0815 0920 - 1020 1115</b>	<b>1215 1255 1355 1520</b>	<b>1620 1732 1832</b>						

**0615 journey operated term time only**

**NO service bank holidays**

<b>Route 891</b>	<b>Banga Buses</b>	<b>Saturday only</b>		
<b>Wolverhampton</b>	<b>0730 - 0925</b>	<b>1115</b>	<b>1325</b>	<b>1535</b>
<b>Tettenhall</b>	<b>0737 - 0937</b>	<b>1130</b>	<b>1337</b>	<b>1547</b>
<b>Albrighton crown</b>	<b>0748 - 0948</b>	<b>1141</b>	<b>1348</b>	<b>1558</b>
<b>Cosford garage</b>	<b>0752 - 0952</b>	<b>1145</b>	<b>1352</b>	<b>1602</b>
<b>Shifnal victoria rd</b>	<b>0805 - 1005</b>	<b>1155</b>	<b>1405</b>	<b>1615</b>
<b>Stafford Park</b>	<b>0815 - 1015</b>			
<b>Telford</b>	<b>0822 - 1022</b>	<b>1205</b>	<b>1422</b>	<b>1632</b>

<b>Return Depart</b>				*
<b>Telford</b>	<b>0825 - 1025</b>	<b>1210</b>	<b>1425</b>	<b>1635</b>
<b>Stafford Park</b>	<b>0830 - 1030</b>			
<b>Shifnal victoria rd</b>	<b>0837 - 1037</b>	<b>1220</b>	<b>1437</b>	<b>1647</b>
<b>Cosford garage</b>	<b>0851 - 1051</b>	<b>1233</b>	<b>1451</b>	<b>1702</b>
<b>Albrighton</b>	<b>0855 - 1055</b>	<b>1237</b>	<b>1455</b>	<b>1706</b>
<b>Tettenhall</b>	<b>0903 - 1103</b>	<b>1243</b>	<b>1503</b>	<b>1714</b>
<b>Wolverhampton</b>	<b>'0920 1115</b>	<b>1255</b>	<b>1520</b>	<b>1730</b>

**\* VIA STAFFORD PARK**

no service bank holidays



| CIL  
| Enforcement  
| Land Promotion  
| Planning  
| Sequential Tests  
| Viability

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