

8. VIABILITY OF PROPOSALS

There are a number of features in the Applicants' proposals which we believe have not been properly assessed to demonstrate viability. The Applicant has not demonstrated a transparent business case for the proposals as a whole; or evidence of costs, income and resulting viability of specific items.

In addition to this, and in stark contrast to the Applicant's submission, our points below clearly highlight significant viability gaps in their proposals. Many of these items are central to the Very Special Circumstances arguments. These viability arguments should be taken into consideration by the Planning Authorities when determining this application.

a) **Care Home Viability.** There are a number of existing care homes in the local area and multiple consultees to the planning application have responded that there is already sufficient capacity in these care homes; which makes the proposed new care home unviable to build. No evidence has been provided by the Applicant to show that the Care home has received support from funders or operators.

- **Generic Assumptions.** The Applicants' proposals for a "modern Care Home facility" seem to be based on their generic assumption of need explained in their statement (Applicants' Planning Statement Document ref: 7.52); that "there is a national need for an increase in provision of accommodation specifically designed around the needs of older people". The Applicant has not provided any specific or local evidence to justify that there is any need in Albrighton.
- **Nearby Care Homes.** In contrast, the Applicants' proposals have received a consultation response from at least one nearby care home company, stating that there is sufficient care home capacity in the vicinity; that there is insufficient care home personnel and staff resources in the area.
- **No basis to proposals.** The Applicant has not demonstrated that there are commercial agreements in place to deliver, and fully staff, a care home and therefore the Consultee's responses need to be given suitable weight against the Applicants' generic statements.
- **Staff resource shortages.** In addition, Shropshire councillor, Tony Parsons, confirmed earlier this year there were up to 1,000 staff vacancies in the county, and he put forward a motion calling for more financial support. Debbie Price, the chief executive of the Coverage Care group of care homes in Shropshire confirmed "care providers are finding it difficult to recruit and retain staff with a 19% staff turnover rate".
<https://www.bbc.co.uk/news/uk-england-shropshire-68433119>
- **Size, scale and massing of the care home** is also not provided in the proposals, which is a key element. The Applicant should be able to advise the number of storeys and approximate footprint so this can be reviewed as part of the outline planning application. The location of the Care home is close to existing buildings and the size and scale is important in order to understand the impact on the surroundings.
- **Summary.** The proposed Care Home facility is unviable and the Applicant is again misleading and misrepresenting the benefits of their application as a whole; and this argument should not be considered a Very Special Circumstance.

b) **School Issues** The proposed development does not meet the needs for educational facilities. Whilst the proposed additional house numbers are high, the resulting low number of secondary age children make a new school non-viable. This will lead to under-utilised facilities and overburdening of existing Primary schools, negatively impacting the quality of education (NPPF, Chapter 8, Paragraph 94).

The size of schools differs across the country, however the latest data for 2022/23 shows that the average size of a secondary school in England accommodates 1,054 pupils.

Based on Department for Education's (DfE) national average pupil yields and 2022/23 average school sizes for England, the typical demand generated by new homes is equivalent to:

- one average sized primary school per 1,104 new homes
- one average sized secondary school per 8,107 new homes

Clearly with the proposals being for 800 new homes; this is insufficient to provide a need for a new secondary school; and it would therefore not receive support from the DfE as a Free School. The Applicant has not provided any evidence to the contrary and this element should therefore be discounted as being misleading and undeliverable.

Refer to this link:

<https://www.gov.uk/government/publications/new-homes-fact-sheet-5-new-homes-and-school-places/fact-sheet-5-new-homes-and-school-places#:~:text=Based%20on%20DfE's%20national%20average%20pupil%20yields%20and%202022%2F23,school%20per%208%2C107%20new%20homes>

The AVAG survey detailed in Grounds For Objection key topic 9 and the Appendices provides additional evidence to reinforce the above points.

- c) **Secondary School not required & not viable** - there is no need for an additional school as there is capacity at Idsall. This will take pupils from Idsall School and make it unworkable/unviable. The proposed school will mean more cars and buses bringing pupils into the village. The size of school proposed is also too small and therefore uneconomical.

The travel plan states that;

“Given the location of the proposed secondary school adjacent to the proposed settlement and existing settlement of Albrighton, it is anticipated that a large proportion of pupils at the secondary school would live locally.”

This confirms that significant numbers of pupils will stop attending the existing school in Shifnal - Idsall school; which will make that school unviable.

This statement also confirms that the Applicants' assertion publicly that the proposal will help provide education facilities for Black Country need is not correct. In addition, South Staffordshire has a three tier (First, Middle and High) School system, which is not compatible with Shropshire two tier (Primary and Secondary) therefore the school would not sit well on the fringes of the village to be serviced by pupils in Albrighton or the neighbouring County villages.

Therefore, the proposed secondary school is not required and will worsen the education provision in the area.

This has been reinforced by the Planning Application objection submitted on the portal by Idsall School Headteacher Ms Michelle King on 22nd July 2024 which confirms that “an additional secondary school would be redundant”.

- d) **Earthworks levels design to eastern side of site** raises significant concerns about viability and its impact of other issues which will detrimentally affect the village:

Drawings and reports submitted indicate that the ground levels to the east of the site need to be raised. This additional volume of fill material to be imported into the site will have a significant impact in various areas.

To assess the volumes of material required; and the associated impact on viability and other factors, a much more detailed computer 3D BIM earthworks cut-fill design model should be undertaken.

This will enable the impact on the following to be assessed:

- cost of volume of fill material on overall project viability calculation.
- number of road haulage movements of any imported earthworks and associated traffic impact during construction.

- impact on retained tree root protection zones to be reviewed to confirm whether raising ground levels around existing trees is practical or whether they need to be removed; and therefore, reduce biodiversity.
 - how will any low spots formed by raising ground around existing trees, roads or hedges (which cannot be raised) be drained? This is especially concerning at the lowest part of the site in the south east; which will be especially prone to flooding
- e) **Health services, GP and Pharmacy** are already massively pressurised and there is no guarantee that the 'Local Centre' will provide additional facilities to improve this. The AVAG survey detailed in Grounds For Objection key topic 9 and the Appendices indicates that there will be an additional c.1000 new adults, 798 new children and 80 care home residents in the village with these proposals. This will place significant additional stress and overload to health services in the village.
- f) **Other services provided within the "Local Centre"** which includes a Supermarket and flexible workspace, have faced extensive criticism from a large number of local residents and businesses in their planning application consultation responses.

The Applicants' proposed commercial units, located remotely from the historic Albrighton High Street, will compete directly with existing businesses and make them unsustainable. This is evidenced by the huge numbers of official public objection comments to this effect.

By contrast, the Applicant has, without any evidence, concluded that their proposals will "ensure the ongoing vitality of Albrighton and provide amenities and facilities that complement the existing provision within the settlement".

This is clearly a direct contradiction and is unfounded, and is therefore not viable and should not be considered a valid Very Special Circumstance to justify release from Green Belt.

- g) **Additional electricity network capacity.** The overwhelming size of the Applicants' proposals will require a significant upgrade in the electricity supply to the village of Albrighton and likely additional power lines, substations, network upgrade upline etc. Pressure will be put on the existing supplies to residents.

There is no evidence in the application that the cost of these electricity network upgrades has been investigated and estimates sought. The costs for this can therefore not have been factored into the overall viability calculation for the proposals. If it has then please can this be submitted for review?

This issue puts further significant doubt on the viability of these proposals.

- h) **Additional drinking water network capacity.** Similar to the electricity supply issue; concerns have been raised about drinking water and water pipe network availability and capacity in the village. This has been highlighted in a number of consultation responses from Severn Trent Water and Albrighton Development Action Group.
- i) These concerns highlight that there has been no due diligence undertaken by the Applicant into the viability AND cost of these water network upgrades. Therefore, these costs cannot have been factored into the overall viability calculation for the proposals. If this has been undertaken then please can this be submitted for review?

This is another issue which puts overwhelming doubt over the viability of these proposals.

j) Additional telecommunications network and mobile phone network capacity. Similar to other statutory services like drainage, electricity and water; the significant increase in the population of the village will require upgrades to the underground telecommunications cable infrastructure with Openreach and Virgin etc; as well as additional mobile phone network capacity.

The publicly available mobile phone network coverage maps show that the mobile availability is currently either "Limited" or "None" in the area of the proposals. Refer to image shown here from [View mobile availability - Ofcom Checker](#)

This indicates that there will be a significant cost to construct new mobile phone towers and upgrade the mobile phone network. There will also be planning implications with regards to these telecoms' masts. The cost of these upgrades does not appear to have been assessed and demonstrated in the planning application; therefore, this cannot have been factored into the overall viability calculation for the proposals. If this has been undertaken then please can this be submitted for review?



k) Planning Application Documentation Issues. The responses of significant numbers of Statutory and Public Consultees have highlighted that the Applicant has not submitted all the required documents. There are also inconsistencies in the submitted documents. For example:

- No ecology surveys submitted
- No engagement with Severn Trent Water or modelling of impact on drainage network
- Shropshire Council Pre-application advice note was based on 600 houses and has seemingly been ignored even though the Applicant has now increased housing to 800
- Application initially submitted with no Green Belt assessment or Planning Statement
- Appendix A Transport Pre-App note references 600 houses not 800
- The submitted Biodiversity Net Gain (BNG) assessment provides only a baseline calculation, lacking the net change in biodiversity units.
- No consultation with the Environment Agency for Groundwater protection as potentially contaminating development (as defined in land contamination DoE industry profiles) located in Source Protection Zones.

This means that many Statutory Consultees have either requested for the application not to be determined yet or for it to be refused.

It is misleading for the Applicant to submit proposals for this substantial development without all the relevant information and reports etc - even for an Outline Planning Application with Reserved Matters. Residents do not have all the required information in order to assess the true impact of the proposals.

We again question the professionalism of the Applicant and its consultancy team. This in turn raises significant doubts over the Applicants' ability to successfully take the proposals from Outline through to Reserved Matters, Detailed Planning Submission and to deliver the proposals in line with any planning conditions that may eventually be imposed on it (if the application is ever granted planning permission). This is extremely concerning for the residents of Albrighton.



Ultimately, we respectfully request that the Planning Authorities take the deficiencies of the Applicants' public consultation and planning application submission failures into account when determining the application; and that the proposals are refused.

l) Response to the Learning and Skills Consultee Comments to this planning application:

The Consultee has provided calculations which are based purely on the numbers that the Applicant has put forward multiplied by standard DfE Yield Data.

It is important for the viability of the 'proposed' school to be factored into this assessment; which has not been done by the Consultee.

Other Consultees have made the point that the school is NOT VIABLE and therefore the consultee's comments are a theoretical exercise and would not in practice ever be delivered; and the calculated figures be discounted.

This should be taken into consideration by the planning authorities.

m) Unviable "Proposed Public Art Opportunities" and "Proposed informal play / trim trail opportunities". The Applicant appears to have scattered these "opportunities" across the drawings submitted. There are approximately 19 "public art opportunities" and 11 "informal play / trim trail opportunities" on the Illustrative Landscape Masterplan. In reality these are just marks on a drawing and empty spaces of land which would need to be funded by others to bring to life.

These "Opportunities" are not costed by the Applicant, not committed to, are wholly unviable and are another cynical attempt to mislead consultees and planning authorities.

Residents have commented that this sort of commitment is typical of what the Applicant promised but did not deliver on Millfields and it is one of the reasons why there is so much mistrust of the Applicant in Albrighton.

