



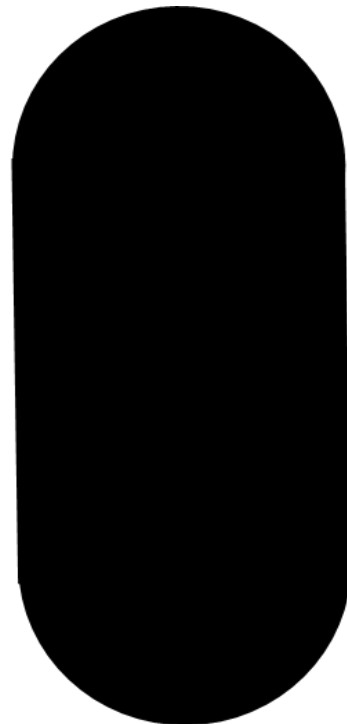
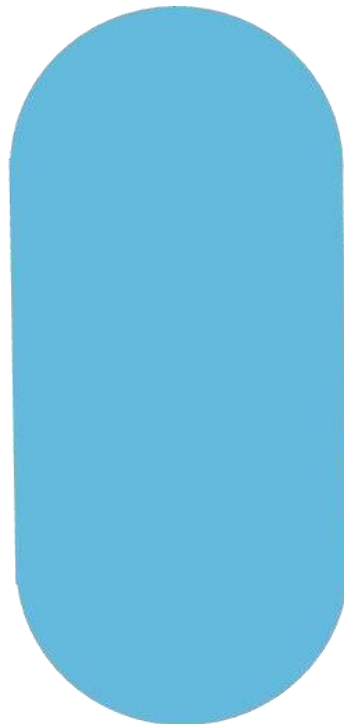
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Planning Addendum: Implications of revised national policy, the Golden Rules and Grey Belt

Albrighton South

Boningale Developments Limited

March 2025



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1. Introduction

- 1.1. This Planning Addendum has been prepared by Marrons on behalf of Boningale Developments Limited ('the applicant') and provides a brief update on planning matters relating to the live application at Albrighton South 24/02108/OUT.
- 1.2. The Addendum address changes in national policy and guidance, the revised housing land supply position and matters relating to the progress of the Shropshire Local Plan Review Examination in Public since submission of the application.
- 1.3. Since the Albrighton South application was submitted, a new Government has been elected and has, immediately upon coming into office, confirmed a commitment to delivering 1.5 million new homes over the current Parliament, turbocharging growth with new, mandatory targets to ramp up housebuilding. This requires the delivery of 370,000 new homes per year, with all areas of the country required to play their part in the national effort.
- 1.4. Deputy Prime Minister and Secretary of State for Housing, Angela Rayner stated with the release of update national policy;

“We cannot shirk responsibility and leave over a million families on housing waiting lists and a generation locked out of home ownership. Our Plan for Change means overhauling planning to make the dream of a secure home a reality for working people. Today’s landmark overhaul will sweep away last year’s damaging changes and shake-up a broken planning system which caves into the blockers and obstructs the builders. I will not hesitate to do what it takes to build 1.5 million new homes over five years and deliver the biggest boost in social and affordable housebuilding in a generation. We must all do our bit and we must all do more”.
- 1.5. This Addendum should be considered alongside the previously submitted Planning Statement, Housing Mix Statement and updated Affordable Housing Statement.
- 1.6. Section 5 considers revised national and policy guidance in regard to 'Grey Belt'. This section should be read alongside the March 2025 Green Belt Assessment prepared by Pegasus.

2. National Planning Policy Framework 2024

- 2.1. On the 12th December 2024, a revised National Planning Policy Framework (NPPF) was published by the government. Paragraph 231 states that ‘The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication’ [emphasis added], whilst paragraph 232 states that ‘existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)’
- 2.2. The updated policies within the revised NPPF are therefore a material planning consideration in regard to the Albrighton South planning application.

Chapter 2. Achieving Sustainable Development

- 2.3. Paragraph 11 sets out the circumstances whereby the presumption of sustainable development (aka the “tilted balance”) applies in decision making. Part d(ii) of Paragraph 11 has been updated to clarify the key policies within the Framework to which particular regard should be had.
- 2.4. Policy 11(d)(i) has been slightly revised, so that the “clear reason for refusal” test is now a “strong” reason for refusal.
- 2.5. Criterion d of paragraph 11 of the NPPF 24 has been updated and now provides additional clarity in regard to circumstances where adverse impacts associated with an application outweigh the benefits, which include directing growth to sustainable locations, making effective use of land, the delivery of affordable housing and securing-well designed places.
- 2.6. In regard to this, Albrighton is an inherently sustainable location. It has a train station, services and facilities to support day-to-day living of residents, is physically proximal to Wolverhampton and development of the subject site would further enhance ongoing sustainability and viability, through effective use of land to deliver not just market and affordable housing, but also to deliver key infrastructure for the area.

Chapter 5. Delivering a Sufficient Supply of Homes

- 2.7. Paragraph 62 states that ‘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 practice guidance.’ Reference to the

standard methodology being the 'advisory starting point' has been removed from the NPPF.

- 2.8. Under the standard methodology, the housing target for Shropshire Council has risen from 1,070 homes to 1,994 home per year.
- 2.9. Paragraph 78 revises the requirement for Local Authorities to maintain a five year housing land supply, requiring that the annual assessment of supply should be based on the standard methodology where current strategic policies are over five years old, with a buffer of 20% where there has been significant under delivery of housing over the previous three years.
- 2.10. The application of the 20% buffer is based on whether the latest Housing Delivery Test result shows that delivery has been below 85%. The Housing Delivery Test results for Shropshire confirm that delivery has exceeded this mark and as set out in Paragraph 78, the Council is now required to apply the additional 5% buffer when calculating its five year housing land supply.
- 2.11. The significant increase in the housing target for Shropshire to 1,994 homes per year (excluding the 5% buffer) is a new material consideration.
- 2.12. Further consideration in regard to Housing Land Supply is set out in Chapter 3 of the Addendum below.
- 2.13. Paragraph 66 removes the previous requirement for a minimum of 10% of homes to be available for affordable home ownership within major development, replacing this with a requirement *'that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures'*.
- 2.14. The applicant is content to agree to a policy compliant mix in line with prevailing national and/or local policy at the time of determination.

Chapter 9. Promoting Sustainable Development

- 2.15. Paragraph 108 (now 109) has been updated with the following additions in bold:
*"109. Transport issues should be considered from the earliest stages of plan-making and development proposals, **using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:***
a) making transport considerations an important part of early engagement with local communities."
- 2.16. Paragraph 115 (now paragraph 116) has been updated with the following additions in bold:

*116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, **following mitigation**, would be severe, **taking into account all reasonable future scenarios.**"*

- 2.17. Consideration of this has been set out by the application highways consultants in the submitted Technical Note 5 (TN05).

Chapter 11. Making Efficient Use of Land

- 2.18. Paragraph 130 has been deleted. This paragraph stated that:

"130. in applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan."

- 2.19. The proposed density across the Albrighton South is considered to make best and effective use of land whilst also seeking to reflect the local character. The more urbanising features of the proposed development are strategically located (albeit indicatively given the outline nature of the application) towards the north of the site and in the areas closest to existing services and facilities and significant closest to the train station and existing public transport connections.

Chapter 13. Protecting Green Belt Land

- 2.20. Many of the Green Belt's core principles are still in place. Development may only take place on designated Green Belt land under very specific circumstances boundaries may only be revisited in exceptional circumstances, and the Green Belt's core goal is still the same.
- 2.21. There are several significant amendments. Councils should now review their Green Belt boundaries "where an authority cannot meet its identified need for homes, commercial or other development through other means."
- 2.22. In such circumstances "authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan" (paragraph 146).
- 2.23. That is to be achieved by a prescribed test set out in paragraph 148: "plans should give priority to previously developed land, then consider grey belt which is not

previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

- 2.24. There are also new prescribed scenarios in which development on the Green Belt will not be considered inappropriate (those being detailed at paragraphs 154-5). Perhaps most notably, development on the Grey Belt would not be inappropriate “where: a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan; b. There is a demonstrable unmet need for the type of development proposed; c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.”
- 2.25. A detailed assessment of the site against the definition and tests of Grey Belt is set out in Chapter 5 below.

3. Housing Land Supply

- 3.1. In addition to reversing the modifications made to the current NPPF by the previous Government, which includes making the use of the standard method for determining minimum housing requirements, mandatory again, a new standard method for calculating Local Housing Need has been introduced.
- 3.2. Along with ensuring the delivery of 1.5 million new homes over the next five years, the primary objective of the new standard method is to ensure that all areas contribute to meeting the nation's housing needs rather than drastically undershooting local ambition in some areas. This will result in a more balanced distribution of homes across the nation by placing homes where they are most needed and least affordable.
- 3.3. Aligned with the below in respect of Green Belt, and through removing some of the provisions under Paragraph 61 of the NPPF23, only where very significant 'hard constraints' can be evidenced to the Planning Inspectorate, will a housing requirement below that generated through the standard method be considered appropriate. Given the constraints and opportunities for growth present across Shropshire, we do not consider that there is any prospect of 'hard constraints' being evidenced to justify deviation from the new method output.
- 3.4. Turning to the new local housing need figure derived from the revised standard method, and published alongside the NPPF 24 in December 2024, for Shropshire, we can see a very significant increase in the minimum number of houses to be planned for on an annual basis.
- 3.5. The revised standard method indicates a minimum, baseline requirement of some 1,994 dwellings per year for Shropshire, against the previous standard method figure of 1,070 dwellings per year. This is a minimum increase in need of some 924 dwellings per year.
- 3.6. This represents a significant step change in need when considered against the annual delivery of housing over the preceding 3-years, which stands at just 1,455 dwellings per annum, thus demonstrating that a significant boost in housing delivery will be required.
- 3.7. Furthermore, the emerging Local Plan Review ahead of confirmation from the Council of the intention to withdraw the Plan from Examination, proposed a minimum of just 31,300 dwellings between 2016 and 2038, which equates to an annual average of around 1,423 dwellings. Notably, this included an uplift to account for high

- growth ambitions (15%) and a contribution of 1,500 dwellings to assist with the unmet needs arising from the Black Country.
- 3.8. If the same uplift and unmet need contribution were to be applied to the new minimum standard method calculation, the Council would be required to plan for a minimum of 53,593 dwellings over a comparative 22 year plan period, equating to 2,437 dwellings per annum, before an appropriate buffer is applied.
 - 3.9. It should also be noted that under a strengthening of the Duty to Cooperate, all authorities, including Shropshire, will be required to work harder to accommodate additional unmet need arising from neighbouring authorities, and as such, the contribution of 1,500 dwellings worth of unmet need should increase significantly, particularly given that the revised standard method, also increases minimum housing need in Wolverhampton considerably. This will be particularly important to note in preparing a new Local Plan for Shropshire to cover the period between 2025 and 2045.
 - 3.10. As such, it is clear that Shropshire are going to have to find a considerable amount of additional land to accommodate their own minimum housing needs in addition to supporting more constrained neighbouring authorities.
 - 3.11. Whilst much of this is a matter for consideration by the Planning Policy team as part of the preparation of a new Local Plan, the revised Local Housing Need figure does now form the basis of the assessment of Housing land Supply in Shropshire.
 - 3.12. The Council produced an updated position on 13th February 2025. This was however ahead of a recommendation from the Local Plan Inspectors', discussed further below, that the Council should withdraw their Local Plan from Examination.
 - 3.13. The Statement provides the Council's assessment for the five year period between 2024 and 2029.
 - 3.14. Noting that the adopted Development Plan is more than five years old, the Council have calculated their supply against the new Local Housing Need figured of 1,994 dwellings per annum.
 - 3.15. On the basis that the Council have 'passed' the Housing Delivery Test, a 5% buffer on this has been applied with the summary of the need set out in Table 1 of the Assessment (replicated below);

Table 1: Council's Assessment of Need

Category		Housing Land Need
A. 5 Year Requirement	2024/25	1,994
	2025/26	1,994
	2026/27	1,994
	2027/28	1,994
	2028/29	1,994
B. Under-Delivery		N/A
C. Buffer (5%)		499
D. Total Requirement (A + B +C)		10,469

3.16. The Council at Table 2 of the Assessment have set out a summary of the Deliverable Housing Land Supply at 1st April 2024 as follows;

Table 2: Council's Assessment of Supply

Category	Net Dwellings
Dwellings on sites with Planning Permission	6,094
Dwellings on sites with Prior Approval	93
Dwellings on selected sites with a resolution to grant	19
Dwellings on allocated sites	689
Dwellings on selected proposed allocated sites	2,071
Dwellings on SLAA sites	133
Dwellings on emerging affordable housing sites	205
Dwellings on windfall sites	598
Total	9,902

3.17. Accordingly, the Councils assessment of their 5-year housing land supply is set out in Table 3 as follows;

Table 3: Council's Assessment of Housing Land Supply

Total Need	10,469
Total Supply	9,902
Over/Under Provision	-567
Number of Years Supply	4.73

3.18. It is important to note, that in the context of assessing what constitutes a “deliverable” site, the 2024 Framework defines “deliverable” in the Glossary as follows (page 72) (emphasis added):

“To be considered deliverable, sites for housing should be **available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years**. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable **until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)**.

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable **where there is clear evidence that housing completions will begin on site within five years.**”

3.19. Planning Practice Guidance Paragraph 007 (Ref ID: 68-007-20190722) states that:
“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions.”

3.20. The onus is therefore placed on the Council to provide clear evidence for those sites which fall within part b), rather than for interested parties to establish whether clear evidence exists.

3.21. Paragraph 007 (Ref ID: 68-007-20190722) states that clear evidence needed to demonstrate that housing completions will begin on site within five years includes:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and*

*anticipated start and build-out rates; firm progress with site assessment work;
 or*

- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.”*

3.22. Having reviewed the Council’s latest supply position in the context of the above listed policy and guidance context, we consider that there are significant shortcomings in regard to the evidence provided to include part B sites in particular.

3.23. We also consider that the Council have taken an overly, and unevidenced, optimistic approach to lead in rates, build out rates and have particular concern about the inclusion of a number of allocated sites where there is evidence available that they will not come forward within a five-year period.

3.24. Accordingly, we assess the Council’s supply, based on current evidence, to be as follows;

Table 4: Marrons Assessment of Housing Land Supply

Total Need	10,469
Total Supply	6,453
Over/Under Provision	-4,016
Number of Years Supply	3.08

3.25. It should be noted that we continue to consider this optimistic and have not sought, at this stage to review in detail evidence on windfall or specific sites within the Prior Approval or Resolution to Grant category. We expect that with significant additional evidence, the Council could realistically fall below the 3-years mark in regard to supply.

4. Local Plan Review

- 4.1. Clearly since the planning application was submitted, there has been considerable change with regard to the 'emerging Local Plan Review'.
- 4.2. Stage 2 Hearing sessions commenced in October 2024 and focussed on matters pertaining to legal compliance, the Sustainability Appraisal, the distribution of land to meet the unmet needs of the Black Country and the Spatial Strategy,
- 4.3. Shortly after the initial 2 weeks, the Inspectors wrote to the Council and paused the Examination citing considerable soundness concerns.
- 4.4. Further substantive findings were published in January 2025 (ID47) and confirmed a number of significant concerns with the Plan as being examined. This included, but was not limited to the need to identify additional land to meet the unmet needs of the Black Country, the need to extend the Plan period by an additional 3 years, including identifying sites to do this, the need to identify an additional 1,000 dwellings to fully meet the needs of Shropshire for the plan period considered to date.
- 4.5. Significantly within this letter, the Inspectors' confirmed that they were unhappy with the approach taken to addressing the unmet need of Black Country and in particular the decision by the Council to accommodate unmet needs around Shrewsbury. Indeed, the Inspectors' considered that there were more suitable locations to accommodate such need, and specifically at paragraph 59 state;
"From the evidence before us, it seems that there are sites around Shifnal and Albrighton, for example, that may well have the potential to meet the BC unmet housing needs in a location close to where the employment needs are being met, or on a new site that could accommodate both. These would be close to the BC where people migrating and commuting to Shropshire are likely to still have links they would wish to maintain".
- 4.6. Indeed this aligns with the position presented in the Planning Statement supporting the Albrighton South application and in particular we note that in oral submissions as part of the hearing sessions, the Council concluded that the only reason that the Albrighton South site had not been proposed for allocation was owing to its location within the Green Belt (a matter addressed in the following chapter).
- 4.7. In response to ID47, the Council proposed in their response to this (GC56) to identify additional land to meet the Black Country Need and undertake a range of additional work to support the identification of additional sites. However, the letter to the Inspectors' confirmed that the Council did not consider it reasonable or necessary to identify an additional 3-years worth of land and extend the Plan period.

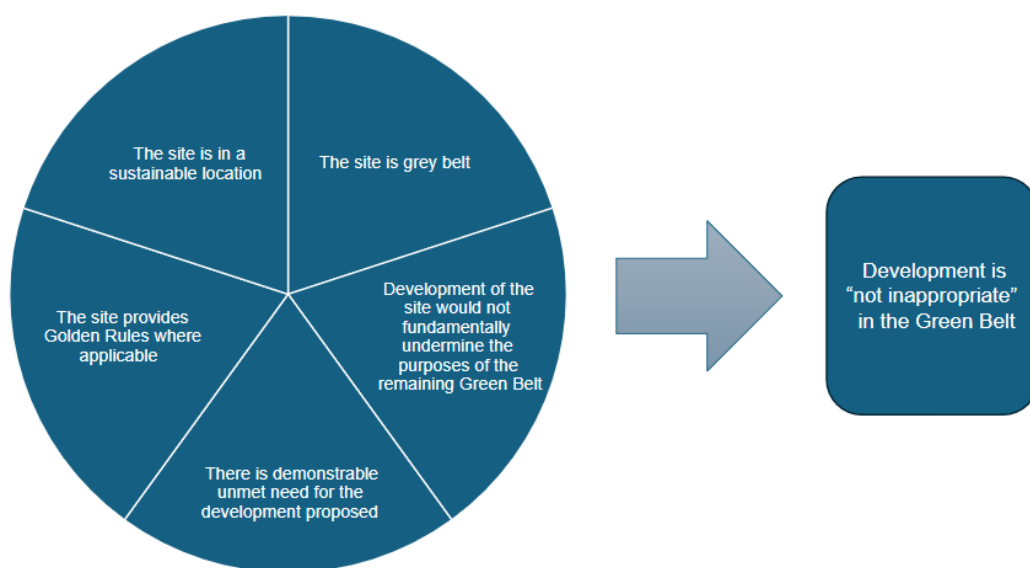
- 4.8. Three days post receiving GC56, the Inspectors' wrote again to the Council (ID48) and recommended, having reviewed the scope and programme of work required to address the significant soundness issues, that the Council withdraw the Plan from Examination (paragraph 14);

"In conclusion, considering the fundamental nature of the additional work, the timetable provided, the omissions from the work programme, and the time taken to undertake work previously, we are not confident that the additional work now proposed could be completed within six months. The combination of these factors leaves us unable to apply our discretion in this case to allow the examination to continue".

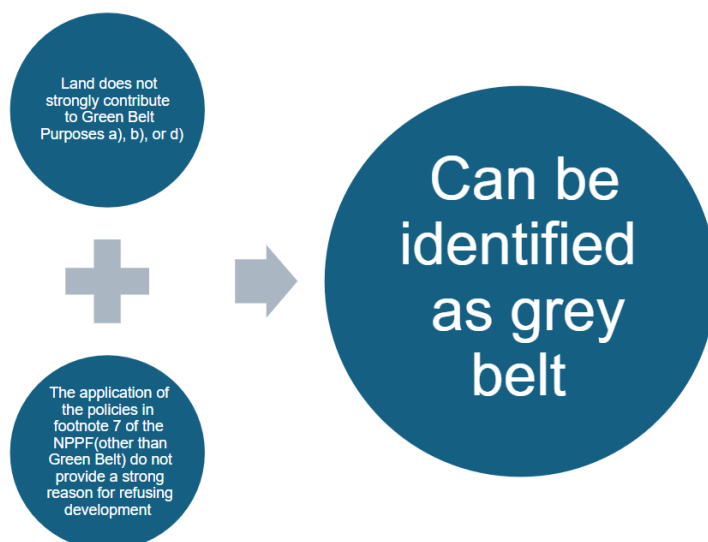
- 4.9. Whilst formal confirmation of withdrawal has still not been issued, in a press statement immediately following this, the Council have stated their intention to withdraw the Plan and commence making a new Plan for the period 2025-2045.
- 4.10. The result of this is that it will be some considerable time before the Council have an up-to-date Local Plan in place, and indeed, noting the significant increase in the minimum number of houses needed, and changes to Green Belt policy, the Council simply have to plan to meet need across a wider spectrum of sites, such as that at Albrighton South, which could deliver significant levels of market and affordable housing along with much needed infrastructure.
- 4.11. The Council cannot continue to fail to meet the needs of existing and future residents of an area.

5. Grey Belt Assessment

- 5.1. As detailed above, the revisions to national policy and guidance have introduces land that can be considered Grey Belt.
- 5.2. Recent changes to the PPG, as detailed in the below diagram, indicate that where a site is Grey Belt, in a sustainable location, meets the Golden Rules, there is a demonstrable unmet need and development would not fundamentally undermine the purpose of the Green Belt as a whole, development should not be considered inappropriate (PPG Paragraph: 010 Reference ID: 64-010-20250225).



- 5.3. The Grey Belt is defined as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. *'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development*" (Annex 2, page 73).
- 5.4. Details of the approach to be taken to the assessment of Grey Belt is detailed in the PPG (Paragraph: 007 Reference ID: 64-007-20250225) and principally comprises two distinct elements;
- Land that does not strongly contribute to Green Belt Purposes A, B and D; and
 - Where the application of policies in footnote 7 of the NPPF do not give rise to a strong reason for refusing development.



5.5. Taking the above into consideration, and alongside the assessment set out in the Pegasus March 2025 report, the below assesses the Albrighton South site against the 5 identified tests (Footnote 7 constraints, sustainability, needs, purposes A,B and D and wider Green Belt consideration). Commentary is provided in regard to each of these elements.

Table 5: Grey Belt Assessment

Test	Pass / Fail	Commentary
Test 1. Designations (footnote 7)	✓	<p>The site is not considered a habitat site as defined by para 194 of the Framework.</p> <p>The site does not form part of or is located proximally to a Site of Special Scientific Interest</p> <p>The site is not a Local Green Space</p> <p>The site is not within a National Landscape</p> <p>The site is not a National Park</p> <p>The site is not a Heritage Coast</p> <p>There is no irreplaceable habitat located within the site as confirmed through the submitted Preliminary Ecological Assessment</p> <p>There are no designated heritage assets within the site. A detailed Heritage Impact Assessment considers the impact of the proposed development on nearby assets. This has been reviewed by the Council’s Conservation Officer who has raised no objection to the proposed development.</p> <p>The site is located in Flood Zone 1. The Lead Local Flood Authority have reviewed the supporting technical information and have raised no objections on the basis of flood risk.</p> <p>As such, the development of the site is not restricted by footnote 7 constraints and test 1 is passed.</p>

Test 2. Sustainability (para 155)	✓	Albrighton is a highly sustainable village. It has a train station, providing regular services to Wolverhampton. It has regular bus services and a range of services and facilities, including a Primary School, local shops, restaurants, community centres and sporting provision. Albrighton is physically the closest sustainable settlement in Shropshire to neighbouring Wolverhampton and the Black Country, from which unmet housing and employment need is being generated. Test 2 is passed.
Test 3. Needs (para 155)	✓	As confirmed by the Council's February 2025 Housing Land Supply Statement, they cannot demonstrate a sufficient supply of housing. As such there is an agreed demonstrable unmet need and as such test 3 is passed.
Test 4. A, B, D Purposes		
- A	✓	Albrighton is a village. The site is not adjacent to a large (town or city) built up area. See paragraph 2.7 of the Pegasus Green Belt Assessment March 2025 report. No contribution to Purpose A.
- B	✓	Albrighton is a village. The site does not form part of a gap between towns. The site performs. See paragraph 2.9 of the Pegasus Green Belt Assessment March 2025 report. No contribution to Purpose B.
- D	✓	Albrighton is not a historic town. The site therefore does not form part of the setting of a historic town, nor does it have any physical, visual or experiences connection to a historic town. Consideration of the heritage impact of the proposed development is set out in the supporting Heritage Impact Assessment. See paragraph 2.12 of the Pegasus Green Belt Assessment March 2025 report. No contribution to Purpose D.
Test 4. Conclusion		The Site makes no contribution to Purposes A, B or D. Test 4 is passed.
Test 5. Wider Green Belt (para 155)	✓	Development of the site would not fundamentally undermine the Green Belt in Shropshire as a whole. The Council through their recent work on the soon to be withdrawn Local Plan confirmed that Exceptional circumstances for Green Belt release existed and as such have acknowledged the need to release land to meet the needs of residents. The site represents only 0.2% of Shropshire Green Belt and as demonstrated on the submitted landscaping masterplan, the new Green Belt boundaries would follow existing features on the ground including established road corridors where existing hedgerows and tree planting would be predominantly retained. As such, a strong defensible boundary would be created. Test 5 is passed.

5.6. Clearly therefore, having regard to the above, and indeed the conclusions set out in the Pegasus Assessment (March 2025), the **Site very clearly meets the Grey Belt tests** set out in policy and guidance and as such, subject to the Golden Rules, set out in the following chapter, should be considered Grey Belt.

- 5.7. Notwithstanding the clear evidence that the site does meet the tests of Grey Belt, even if it were determined that the site remains part of the Green Belt, the previously presented Very Special Circumstance case carries forward. As a reminder, this is set out in the Planning Statement submitted with the application at page 64 onwards. For ease, the case can be summarised as follows;
- The national housing crisis;
 - Time Expired Development Plan
 - Lack of a five-year housing land supply
 - Crisis of affordability
 - The economic and social benefits associated with the development
 - The provision of new housing
 - The provision of new education facilities
 - The provision of local shopping/retail facilities
 - The provision of Older Persons Specialist Accommodation
 - The provision of affordable housing
 - The provision of flexible workspace/employment
 - Improvements to the local highway network
- 5.8. In addition to the case put forward previously, the conclusion of the Local Plan Review Inspectors in regard to the most appropriate location for housing unmet need arising from the Black Country (as set out in ID47) should also be taken into consideration.

6. Golden Rules Statement

6.1. Paragraph 156 of the NPPF 2024 states;

“Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. necessary improvements to local or national infrastructure; and*
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces”.*


6.2. Paragraph 157 goes on to state;

“Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%”

6.3. The below therefore considers the proposed development against each of these rules.

Table 6: Golden Rules Assessment

Rule	Pass / Fail	Commentary
Provision of affordable housing	✓	The adopted Affordable Housing Requirement as set out within the Development Plan is for the delivery of 20% affordable housing. In line with the Golden Rules, the proposed development will deliver 35% affordable housing. This is 15 percentage points above the existing requirement and can be secured through a Section 106 legal agreement.
The provision of infrastructure	✓	The proposed development includes significant improvements to infrastructure at both a local and regional scale. For completeness this includes; - The provision of a new Secondary School;

		<ul style="list-style-type: none"> - The provision of a new GP Surgery and Pharmacy; - The provision of a new supermarket; - The provision of a new specialist Care Home; - The provision of a new spine/distributor road, which will elevate existing highway safety issues; - The provision of highway mitigation at the A41/Heath House Lane/Wrottesley Park Road cross roads in neighbouring Staffordshire, improving connectivity for Shropshire and beyond to Wolverhampton
<p>Accessible Greenspace</p>		<p>50% of the site comprises accessible green space. The identified green space (albeit the application is in outline) will be accessible to new and existing residents. Care has been taken to ensure that a green network runs through the centre of the site, connecting the proposed community facilities with proposed residential dwellings. The proposed development includes and strongly promotes active travel corridors, with green routes prioritised for use by pedestrians and cyclist.</p>

7. Conclusions

- 7.1. The Planning Addendum has been prepared by Marrons on behalf of Bonningale Developments and provides an update further to significant national policy and guidance changes, updates on the Shropshire Local Plan, Shropshire's Housing Land supply and the introduction of Grey Belt.
- 7.2. National Policy changes have brought about the reintroduction of mandatory housing targets and for Shropshire this has resulted in a near doubling of the minimum level of housing required.
- 7.3. Changes in regard to the approach to be taken to Green Belt include a mandate to review Green Belt boundaries and the introduction of Grey Belt land, where development is not considered inappropriate.
- 7.4. Further to a detailed assessment of the subject site it has been concluded that the site is Grey Belt and more than sufficiently delivers on all three of the Golden Rules now set out in national policy.
- 7.5. The site will deliver 35% affordable housing, significant areas of accessible, and useable green space and infrastructure that simply without development such as this, would not be delivered.
- 7.6. The Council now accept that they are unable to demonstrate a sufficient supply of deliverable housing and with the Local Plan Review set to be withdrawn from Examination imminently, the policy vacuum in Shropshire is ever wider.
- 7.7. As confirmed through consultation on the application to date, there are no outstanding technical objections and the site could deliver meaningful levels of market and affordable housing in the short-term to address some of the issues brought about by this vacuum.
- 7.8. As such, we invite the Council to approve the application without delay.



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