

2. PROTECTION OF GREEN BELT - VERY SPECIAL CIRCUMSTANCES NOT MET

The primary aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The proposed development compromises the openness and permanence of the Green Belt, which conflicts with national policies on protecting such areas. This development will lead to irreversible harm to the environment and landscape. Green belt boundaries need to endure in the long term, and this change is clearly not the long term; so soon after the last changes to the Green Belt boundaries around the village. National Planning Policy Framework (NPPF) Chapter 13. Paragraphs 142 to 156.

a) Very Special Circumstances have NOT been met to allow the destruction of the Green Belt

The Applicant argues that the inclusion of the items below constitutes Very Special Circumstances in order to build on the Green Belt. However, these items are either not viable or will on balance be detrimental to the village of Albrighton when weighed against the other significant impacts which they will cause to the village.

These items below do not outweigh the 48 hectares of prime agricultural land that will be destroyed; creating permanent and severe loss, damage and harm to the West Midlands / Shropshire Green Belt:

Economic Contribution from 800+ houses, shop, school, care home etc - however the size and scale of the development will destroy the character and wellbeing of the village. Economic contribution is an invalid claim as existing village shops/supermarkets will experience a reduced footfall with associated economic and financial distress and likely job losses. Very Special Circumstance not met.

Housing provision: Whilst the proposals would provide 800+ houses, there is already a 5-year housing supply in place for Shropshire and the County's Local Plan has sufficient provision for housing in the Village. Albrighton has committed to increasing its building stock by 771 houses in the Local Plan; so the Applicants' proposals would be unsustainable. Therefore, Very Special Circumstance not met.

Improved recreation facilities (e.g. pedestrianising 3 roads and creating footpaths, orchards etc). These will lead to unacceptable traffic capacity problems, ruin the village character and do not outweigh the damage caused by losing the Green Belt.

The current area is easily accessible to the local community and widely enjoyed via leisure activities ranging from horse-riding, walking groups and general exercising. It is a naturalised environment with a range of farmland and hedgerows hosting a wide variety of biodiverse species. It provides superb open views and contributes to the character of Albrighton and the holistic well-being of residents.

Recreation facilities are detailed in the planning application but experience at Millfields development as delivered by the Applicant demonstrates that they will not be delivered and are therefore false promises.

Removing access to regularly utilised and historic roads/walking routes, footpaths and fields but replacing with a few parks and green routes within the proposed housing development does not sufficiently mitigate the loss of open green belt, biodiversity, character and hedgerows and does not represent a true and realistic improvement in recreation facilities to the residents of Albrighton.

Few people, other than the residents in the proposed development will have true and regular access to any recreation facilities, so despite the additional recreation facilities listed in this proposal there remains a significantly detrimental impact to the residents of Albrighton. Very Special Circumstance not met.

Educational facilities – Secondary school; there is no identified need for a secondary school in Albrighton or the surrounding area (Shifnal). Such an inclusion in the application has no weight for consideration as it is not within the remit of a Applicant to provide, and there has been no



application by the Local Authority or any school trusts to gain support from the Department For Education to build a free school.

This is because it is evidently unviable to build in Albrighton for a number of reasons but primarily because there would be insufficient pupils to fill a new free school. Furthermore, it would be detrimental to the nearby local catchment school, Idsall, reducing their pupil numbers significantly and therefore making the existing secondary school unviable.

Indeed, the Marches Trust Head of Idsall School has submitted an objection to this application. It would seem highly unlikely to gain approval from the Department of Education to be built on this basis and is therefore an invalid claim and Very Special Circumstances are not met.

Meeting specific needs – Care Home; no need has been identified by Albrighton as there is sufficient capacity in the area and nearby, therefore this is a false claim. Additionally, there is likely to be a failure to appropriately staff an additional care home due to local staff shortages and this makes it also unviable.

No consideration given to the impact on an already over-stretched GP surgery of additional elderly residents in care home and this would have a detrimental impact on all residents in Albrighton. Very Special Circumstances are not met.

b) Neglected Brownfield / Grey Belt sites should be regenerated instead as stated in the newly proposed NPPF proposals.

c) Response to the Applicants' Planning Statement Document

This section reviews in detail the points included in the Applicants' Planning Statement Document. Note that the reference numbers below mirror the references in the Applicants' document to assist with review and comparison.

Marron's Planning Statement Document Management Record: It is telling that this states that all versions of the document were authored, checked & approved by the same person; initialled as MW (Megan Wilson). This does not appear to be in line with best practice for Chartered Town Planner organisations and raises questions about whether the document is a personal work by one individual, instead of a professional town planning organisation. This casts doubt on the veracity of the document as a whole by the Applicants' team.

0.2. The second paragraph of the Applicants' Executive summary states that "The Site... was determined by the Council to be suitable for residential development...". This is factually incorrect and is another example of the Applicants' strategy to misrepresent the impact of the proposals and mislead the planning authorities and consultees. This is unacceptable and the Planning Authorities should see through these false statements and in the determination of this planning application.

The April 2024 Appendix 2 Shropshire Local Plan Updated Additional Sustainability Appraisal Report states on page 472 that the following key points about the Applicants' proposed site: P36A & B:

*"Potential for Windfall? **No**"*

*"Potential for Allocation? **No**"*

*"Recommendation - **Retain as Green Belt**"*

"Reasoning: Safeguarded land [is] available to meet settlement development requirements along with infill and exception site opportunities."

*"Development could **impact on settings of Grade II listed Lea Hall and Boningale Conservation Area. Site would substantially reduce spatial separation between Albrighton and Boningale.***

*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.”*

0.3. The Applicant uses the following reasons as Very Special Circumstances for removing the site from the green belt. The arguments against these area clear as described below:

a. Site Suitability: The Applicants' statement that “the site has recently been considered suitable for safeguarding” is incorrect; the Council has in fact concluded in the April 2024 Appendix 2 Shropshire Local Plan Updated Additional Sustainability Appraisal Report on page 472 the following key points about the Applicants' proposed site: P36A & B:

*“Potential for Windfall? **No**”*

*“Potential for Allocation? **No**”*

*“Recommendation - **Retain as Green Belt**”*

The Applicant is again attempting to mislead and misrepresent. It appears that the Applicant is referring to the already safeguarded small northern portion of P36A (safeguarded for development after 2038). **The Safeguarded site is a different site to the Applicants' proposed site.** The Safeguarded site is very small in comparison to the Applicants' proposed site and differs extensively from the Applicants' proposals.

Importantly the Applicants' proposed site would be significantly detrimental to the already agreed Safeguarded site adjacent. For example, if the Applicants' proposed site was granted planning permission, then its presence would negatively impact on the Safeguarded site's, traffic impact, drainage and water capacity, safety of residents, additional pressures and impact on existing services in the village etc.

b. Suitability To Meet Black Country Need: The Applicants' statement that the Applicants' proposed “Site is the single most appropriate location to meet [Black Country unmet housing] need” is not correct; as evidenced by the April 2024 Appendix 2 Shropshire Local Plan Updated Additional Sustainability Appraisal Report on page 472 which states that **“there are other more appropriate sites upon which to accommodate these proposed contributions”**.

Again, the Applicant is misrepresenting and misleading what they have generated as ‘evidence’. The recent Shropshire Local Plan public consultation received overwhelming support especially from over 150 respondents from Albrighton. This reinforces that the Shropshire Local Plan is appropriate, accurate and democratically and accountably accepted by the people of Albrighton and Shropshire.

c. Housing Supply: The Applicants' statement that the “Council cannot currently demonstrate a sufficient supply of deliverable housing” has recently been confirmed as being incorrect by The Planning Inspectorate in the Appeal Decision for APP/L3245/W/23/3322079 Benthall Grange, Broseley, Shropshire on 3rd April 2024.
[Reference: APP/L3245/W/23/3322079 \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk)
Paragraph 10 confirms that the Council **“is able to demonstrate a 5-year housing land supply”**.



Again, the Applicant is seeking to mislead consultees and the Planning Authorities. This undermines the veracity and good faith that should be held by planning Applicants'. This argument should not be considered as a Very Special Circumstance.

e. Location & Characteristics: The statement that the "site is suitable for residential development in terms of location and characteristics and it is not of high environmental or landscape value" has again already been dismissed as being false by the April 2024 Appendix 2 Shropshire Local Plan Updated Additional Sustainability Appraisal Report. This states on page 472 that the Applicants' proposed site P36A & B could:

"impact on settings of Grade II listed Lea Hall and Boningle Conservation Area, would substantially reduce spatial separation between Albrighton and Boningle, is considered to be located within a sensitive Green Belt parcel, the release of which would have high harm; and is poorly related to the built form of the settlement. The site is not suitable for Windfall OR Allocation housing."

These views have been supported extensively in the recent Local Plan consultation and by the over 900 residents and consultees who have opposed the planning application.

The Applicant is again making misleading and misrepresentative statements and this should be taken on board by the Planning Authorities to ensure that Very Special Circumstances are not determined for the application.

f. Affordable Housing: The Applicants' proposed percentage of affordable housing is substantially less than the new NPPF document currently being consulted upon. The Applicant seems to want to refer to this new NPPF document (refer to planning application document "Letter from Agent" dated 2nd August 2024). Therefore, the Applicants' proposals cannot be counted as Very Special Circumstances

g. Housing Provision: The Applicants' statement that "the provision of market housing... will provide new, quality homes" is a Very Special Circumstance which is not valid for two reasons. Firstly, the Applicant is currently building over 250 houses on the Millfields development in Albrighton village; in addition, another application has recently been submitted by Wain Estates for another 150 houses in the village which ARE included in the Local Plan 24/02662/OUT. It is therefore not a Very Special circumstance that they are proposing new market housing; as these circumstances already exist.

Secondly the Applicant asserts that their proposals will provide "quality homes". The Applicants' current Millfields development residents have been recently surveyed and 81% of residents had problems with the housing and 79.4% of residents have still not had them resolved. Problems include drainage (77% of responses), plastering / decorations (42.6%), plumbing (41%), windows (37.7%), rear garden (54.1%), carpentry (36.1%). Full survey results are shown in other sections of this document.

This evidence suggests that the Applicant is not building "quality homes" and is again attempting to mislead consultees and the Planning Authorities about the benefits of their application.

This item should not be considered as a Very Special Circumstance.

h. House Prices: The Applicants' assertion that their proposals will supply housing which will 'curtail the exceptional growth in house prices' is nonsense. The Applicant is already building over 250 houses in the village, average selling price of PHASE 3 Millfields plots, to be released late Summer/Autumn 2024 is £407,128. In addition, a further 150 houses under application ref 24/02662/OUT may already affect house prices before the Applicants' proposals may ever materialise.



The Applicant is a commercial developer who has no interest in reducing their own house prices, or ability to control the overall housing market. House prices are a function of broad market and economic trends.

The Applicant is again seeking to misrepresent and mislead for their own benefit. The house price argument should clearly not be considered a Very Special Circumstance.

i. Secondary School: The Applicants' point about their proposed Secondary School "meeting an identified need" is false and this has been corroborated by a number of consultees.

The proposed secondary school is unviable as

- i) the nearby Idsall Secondary School has capacity and is not full (this has been confirmed by the school Headteacher Ms Michelle King in a response to the application) and
- ii) the proposed secondary school would remove pupils from Idsall and make Idsall school unviable.

Again, the Applicant is attempting to mislead the planning authorities and consultees. This element of their "Very Special Circumstances" claim has clearly been cherry picked to gain favour with authorities; the school proposal is invalid and is, in our view, a trojan horse to achieve outline planning permission.

If this succeeded the site of the school would remain dormant, giving rise to the possibility of the Applicant seeking to develop it as more lucrative housing.

j & k. Care Home: The Applicant's proposals for a "modern Care Home facility" seem to be based on their generic assumption of need explained in their statement in 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.

In contrast, the Applicant's 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.

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 Applicant's generic statements.

In addition Shropshire councillor, Tony Parsons, confirmed earlier this year there were up to 1,000 staff vacancies in the county, 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>

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.

l. Local Centre: The Applicant's proposals for a "Local Centre," which includes a Supermarket, GP Surgery, Pharmacy, and flexible workspace, have faced extensive criticism from a large number of local residents and businesses in their planning application consultation responses

Public opinion is overwhelmingly that the Applicant's 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 should therefore not be considered a valid Very Special Circumstance.

m. Highways: The Applicant states that “highway improvements... will improve vehicular access”. Contrary to this, extensive concerns have been raised through the planning application consultation period that the Applicant’s proposed highway design will close three separate existing roads into the south of the village and replace them with ONE new road connecting to a spine road through the new housing and commercial estate; whilst at the same time increasing vehicle movement numbers by thousands a day.

The Applicant’s proposals for Cross Road will significantly increase traffic volumes and reduce highway safety. The plan includes removing a recently installed roundabout at the Cross Road - Elm Road junction, which was implemented for safety reasons; we also disagree with the visibility splay at this junction that the developers have included in their plan. Additionally, the proposal involves replacing a pedestrian footpath, currently segregated from the road by an attractive verge, with a combined cycle and pedestrian route. We are also concerned about the noise impact on existing residents from the raised zebra crossing and worry that the existing issue of speeding on this already busy road will be greatly exacerbated by the increase in traffic.

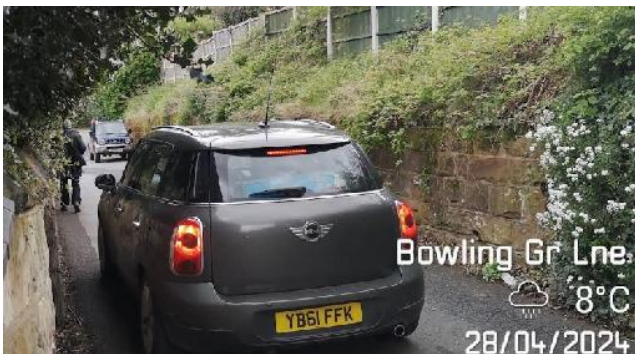
The Applicant’s proposals have not considered the impact of vehicles leaving north towards the M54 using Elm Rd and Bowling Green Lane. These roads have at least three sections which are only wide enough for one vehicle to pass at the same time. This is due to either lane width or permanent parked cars due to houses with no drives - which forces vehicles to



Elm Road



Elm Road existing traffic issues caused by narrow lanes



Bowling Green Lane existing traffic and pedestrian safety issues caused by narrow lanes



park on the road and block one lane. Therefore both roads have sections with no pedestrian footpath.

If the Applicant's proposals are approved, these roads would become a short cut with the potential to be used by significant numbers of additional vehicles each day. This would undoubtedly lead to substantial vehicle and pedestrian safety issues.

The reduction in the number of roads to the south of Albrighton will significantly reduce capacity and route-diversity in an area which is accessed by farm traffic as well as the existing and proposed residents. This will inevitably lead to standing traffic and gridlock.

Given the above, the Applicant's statement that "the provision of highway improvements, including a new gateway spine road will improve vehicular access to Albrighton from Telford and Wolverhampton", is blinkered, misrepresentative of the true impact of highway measures and is another attempt to mislead consultees and the planning authorities of the benefits of the proposals. This should not be considered as a Very Special Circumstance.

n. Active (Green) Travel Route: The "creation of an Active (Green) Travel route" is only necessary to offset the negative highway traffic impacts of the proposals (refer to **m. Highways** above). This is a mitigation measure to serve the additional houses and should not be considered a Very Special Circumstance.

The overall summary included in the Applicants' Planning Statement Executive Summary offer S106 agreements, S278 agreements, financial contributions and mitigation of impacts of the development. None of these are necessary as the Applicants' proposals are unviable, unnecessary, not included in the Local Plan and will severely negatively impact the community and wider area.

In summary, the planning authorities have a duty to listen to the overwhelming weight of the arguments given by the residents of Albrighton; and apply the proper balance to determine that Very Special Circumstances have not been met to remove this land from the Green Belt.

