

PATSHULL ROAD, ALBRIGHTON - PLANNING INQUIRY**PINS Reference: 6007402****PLANNING PROOF OF EVIDENCE REBUTTAL STATEMENT & NPPF ADDENDUM -
RULE 6 PARTY****Submissions of the Albrighton Development Action Group (ADAG)**

An NPPF Addendum Statement is appended to this rebuttal statement which provides comments on the new NPPF (August 2026).

The Statement should be read in conjunction with the Planning Proof of Evidence of Mr Thomas Ryan dated 18 August 2026. They do not seek to rewrite that Proof, but identify the material changes in national policy which affect the Rule 6 Party's case.

"APPELLANT'S PROOF PARAGRAPHS 6.4–6.8 – SCALE OF DEVELOPMENT"

The Appellant's characterisation of ADAG's case at paragraphs 6.4–6.8 is misinterpreted. ADAG does not contend that the Appeal proposal is unacceptable simply because 800 dwellings represents, numerically, a substantial development. Indeed, ADAG's Proof expressly acknowledges at paragraph 4.8 that the indicative housing figures should not be treated as a ceiling or as determinative of sustainability. Rather, consistent with Policy MD3, the extent to which a proposal exceeds the settlement housing guideline is a significant policy consideration in determining whether the scale of development is proportionate to the settlement and whether it can be accommodated sustainably (ADAG's Planning Proof of Evidence, paragraphs 3.24–3.25 and 4.8).

The Appellant therefore frames the issue too narrowly at paragraph 6.7 of their Planning Proof of Evidence, where it states that the relevant question is whether the scale of development produces unacceptable planning consequences. The crux of the issue instead resides around whether development of this magnitude is appropriate at Albrighton, on this Site and having regard to its particular relationship with the existing settlement, including the adopted spatial strategy and settlement hierarchy, infrastructure capacity and opportunities for sustainable transport. Those matters form the substance of ADAG's evidence at paragraphs 4.3–4.22 of the Planning Proof of Evidence. They are also directly relevant to the application of Policy MD3 and the NPPF requirement that significant development should be focused on locations which are, or can be made, sustainable (ADAG's Planning Proof of Evidence, paragraphs 3.39 and 4.17–4.18).

In this regard, the Development Plan deliberately distinguishes between the respective roles and anticipated levels of growth of settlements within the same broad tier of the settlement hierarchy. As explained at paragraphs 3.11–3.15 and 4.5–4.13 of ADAG's Planning Proof of Evidence, Policy CS3 identifies Bridgnorth as a focus for development, whereas Albrighton is identified as a settlement which *"will have development to meet local needs, respecting their location in the Green*

Belt". Table 2 of Policy CS3 correspondingly identifies fewer than 500 homes for Albrighton, compared with 500–1,000 homes at Bridgnorth and Shifnal. ADAG acknowledges the housing supply situation and how these housing figures are outdated, however they provide important policy context as to Albrighton's intended role within the spatial strategy and the scale of growth anticipated for the settlement. It is in that context that ADAG's Planning Proof of Evidence (paragraph 4.14) concludes that the Appeal proposal would significantly exceed the scale of growth envisaged by Policies CS3, MD1, MD3 and S1, undermine the established settlement hierarchy and conflict with the planned distribution of growth.

The reliance of the Appellant upon the absence of objections from individual statutory consultees does not resolve that strategic planning issue (refer to paragraphs 6.5–6.6 of the Appellant's Planning Proof of Evidence). Those paragraphs principally rely upon consultation responses concerning highways, flood risk, healthcare and infrastructure capacity. Whilst those responses are relevant to the particular technical matters within the respective consultees' remits, they do not determine whether a strategic-scale extension of up to 800 dwellings is appropriate for Albrighton having regard to the Development Plan's spatial strategy, settlement hierarchy and planned distribution of growth. Those are matters of planning judgement which require consideration of the Development Plan and the NPPF as a whole; they cannot be answered simply by reference to the absence of technical objections from consultees.

Accordingly, the Appellant does not engage with the substance of ADAG's case. ADAG's position is not that 800 dwellings are unacceptable merely because 800 is a large number. The issue is whether development of that magnitude is appropriate in this settlement, in this location and in its relationship with the existing settlement, having regard to Albrighton's role within the spatial strategy and settlement hierarchy, the capacity and delivery of infrastructure, and the availability of genuine sustainable transport opportunities. As summarised at paragraphs 5.5–5.9 of ADAG's Planning Proof of Evidence, those considerations are integral to the assessment of locational sustainability and lead ADAG to conclude that the proposal represents a disproportionate scale of growth which conflicts with the adopted spatial strategy and has not been demonstrated to constitute sustainable development in this location.

APPENDIX 1

3 September 2026

PATSHULL ROAD, ALBRIGHTON - PLANNING INQUIRY

PINS Reference: 6007402

PROOF OF EVIDENCE ADDENDUM - RULE 6 PARTY

"NPPF 2026"

Submissions of the Albrighton Development Action Group (ADAG)

Following publication of the National Planning Policy Framework (NPPF) on 17 August 2026, the Planning Inspectorate invited comments on the revised NPPF by 3 September 2026.

These submissions should be read in conjunction with the Planning Proof of Evidence of Thomas Ryan dated 18 August 2026. They do not seek to rewrite that Proof, but identify the material changes in national policy which affect the Rule 6 Party's case. They address:

- The decision-making approach under the new NPPF (August 2026);
- The Green Belt route to decision-making and the role of locational sustainability;
- Sustainable transport and infrastructure; and
- The planning balance and conclusion.

A. THE DECISION-MAKING APPROACH UNDER THE 2026 NPPF

The statutory starting point is unchanged. Section 38(6) of the Planning and Compulsory Purchase Act 2004 continues to require the Appeal to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The August 2026 NPPF confirms that the new national decision-making policies are material considerations to be read alongside the Development Plan.

The new Framework applies to decision-making from the day of publication. Annex A also changes the way weight is expressed: Development Plan policies, or parts of policies, which are materially inconsistent with national decision-making policies should be given very limited weight; other policies should not be given reduced weight simply because they pre-date the new Framework.

This is important to the Rule 6 Party's evidence. The Proof already accepts that the housing figures in Policies CS1, CS3, MD3 and S1 attract limited weight in the present housing supply circumstances, but maintains that their spatial objectives - settlement role, proportionate scale, infrastructure capacity and sustainable location - remain materially relevant. Those objectives are consistent with the new national decision-making policies identified below and there is no basis to reduce their weight merely because of the age of the Development Plan.

The new presumption in favour of sustainable development is contained in Policy S3. However, because the Appeal Site is wholly within the Green Belt, Policy S5 is not the principal route to determining the acceptability of the development. S5(5) expressly provides that development in the Green Belt should instead be determined under Policies GB6, GB7 and GB8, as appropriate. It is however yet to be confirmed or tested beyond all doubt that Policy S5 would not apply to Grey Belt, as opposed to Green Belt land.

B. GREEN BELT AND LOCATIONAL SUSTAINABILITY

ADAG continues to defer to the Council on the separate Green Belt case and on whether the Appeal Site meets the Grey Belt definition. The new national policy structure however ties in the locational sustainability evidence, which is directly relevant to ADAG's evidence.

Importantly, if the Site is not Grey Belt and does not fall within another category in Policy GB7 (covered below), Policy GB6 would apply. Development is then inappropriate, harmful by definition, and should not be approved except in very special circumstances, with substantial weight given to Green Belt harm, including harm to openness. This planning balance has not changed from the previous NPPF.

However, if the Inspector concludes that the Site is Grey Belt, Policy GB7(1)(g) requires all four criteria to be satisfied before the development is treated as not inappropriate. The development must utilise grey belt land without fundamentally undermining the purposes of the remaining Green Belt across the plan area; there must be an evidenced unmet need; the development must be in a sustainable location, with particular reference to Policy TR3; and major housing development must comply with the Golden Rules in Policy GB8. The criteria here have not materially changed from the previous NPPF, however the reference to other national policies does draw on new requirements, with Policy TR3 being directly relevant to ADAG's case (covered in Section C) of this Addendum below, as well as in the corresponding Transport Addendum prepared by Mr John Russell).

There is a separate route in GB7(1)(h) for residential or mixed-use development. It is considered that all of the criteria need to be passed for the Appeal site to meet this test. The Appeal Scheme would not satisfy this route as it fails a number of the criteria (detailed below).

GB7(1)(h)(i) – "Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B)"

The Appellant confirms at paragraph 3.86 of the Transport Assessment (CD7.1) that there is an hourly service operating out of Albrighton Railways Station. This falls short of the *"at least two trains or trams per hour in any one direction"* definition of a well-connected railway station.

It is common ground between the Rule 6 Party, the Appellant and the Council that the distance between the railway station and the Appeal Site is 1,510 metres at the closest point to the Appeal Site and 1,840 metres to the centre of the Appeal Site.

The Appeal Site is therefore well beyond the Framework's definition of a reasonable walking distance from the station, which additionally does not meet the definition of a well-connected railway station, and so does not satisfy sub-paragraph (i).

GB7(1)(h)(ii) – "Be physically well-related to the station or the settlement within which the station is located"

For the reasons set out in the Rule 6 Party's Proofs of Evidence, ADAG consider that the Appeal site would form a substantial new neighbourhood extending south of Albrighton, and is therefore physically separated from the established centre and train station.

GB7(1)(h)(iii) – "Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure"

For the reasons set out in the Rule 6 Party's Proofs of Evidence, ADAG consider that the scale of development is disproportionate and cannot be accommodated within Albrighton when taking into account the level of existing or proposed infrastructure.

C. SUSTAINABLE TRANSPORT AND INFRASTRUCTURE

Mr John Russell has prepared a separate Transport Proof of Evidence Addendum which covers the effect of the new NPPF on his case and the transport-related policies.

The new NPPF also introduces national policies on community infrastructure which are material. Policy HC3 requires major development generating significant additional population to be informed by an understanding of necessary improvements to community facilities and public service infrastructure, and requires their timely delivery so that necessary facilities are available when the development, or an agreed proportion of it, is first occupied.

This new national policy requirement reinforces ADAG's case in paragraphs 4.31-4.33 of the Planning Proof of Evidence. At the time of the Proof there remained uncertainty about what the local centre would comprise, its effect on existing services and facilities in Albrighton, and how and when the local centre and secondary school would be delivered. The Rule 6 Party's position remains that these are material matters when judging whether the scale of development can be accommodated sustainably.

Policy HC4 states that substantial weight should be given to the benefits where new or improved public service infrastructure or community facilities would be provided. ADAG recognises that positive weight may therefore attach to facilities which are secured and deliverable. The amount of weight must however reflect what is actually committed, the certainty and timing of delivery, and whether the facilities respond to identified needs rather than merely being safeguarded in principle (as reflected in paragraphs 4.31-4.32 of ADAG's Planning Proof of Evidence).

In relation to specialist forms of accommodation, Policy HO9 states that specialist housing for older or disabled people should be located where residents will be able to access frequently-used services easily and safely by walking, wheeling (including mobility scooters) and by public or on-site transport services; including through facilities provided as part of the scheme. For the reasons set out in paragraph 5.4 of Mr John Russell's corresponding Transport Proof of Evidence Addendum it is considered that the proposed Appeal scheme conflicts part 1(a)(i) of this policy.

D. PLANNING BALANCE AND CONCLUSION

The statutory starting point is unchanged. Section 38(6) of the Planning and Compulsory Purchase Act 2004 continues to require the Appeal to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Annex A of the new NPPF confirms that policies should not be given reduced weight simply because they pre-date the August 2026 Framework unless they are materially inconsistent with the new national decision-making policies.

The new NPPF expressly directs substantial weight to the benefits of providing homes which contribute towards evidenced unmet needs (Policy HO7). ADAG has already recognised the housing land supply shortfall and the positive weight attaching to housing and other elements of the scheme. That acknowledgement is unchanged.

ADAG's Proof accepts that the numerical housing requirements in Policies CS1, CS3, MD3 and S1 attract limited weight in the current housing supply circumstances. That is however distinct from the spatial objectives of those policies - including Albrighton's role in the settlement hierarchy, proportionate scale of growth, infrastructure capacity and sustainable location - which remain materially relevant and are consistent with the emphasis now expressed through Policies TR3, GB7 and HC3.

The spatial planning case in the Proofs of Evidence submitted by ADAG therefore remains material under the new Framework. Albrighton is a Key Centre with a deliberately more modest role than the principal centres in the adopted strategy. The proposal for up to 800 dwellings and an 80-bed care home would represent a very substantial increase in the size of the settlement, extend development southwards into the Green Belt and create a new focus of activity separate from the established centre.

The Green Belt route to the decision is also material to the balance. For a Green Belt site, the route is through GB6-GB8. If the Inspector finds the Site to be Grey Belt, sustainable location under TR3 is an express requirement of GB7(1)(g). For the reasons set out in this Addendum, ADAG does not consider that the Appellant can rely on GB7(1)(h) as a separate gateway to securing consent.

The new Framework also identifies circumstances in which community facilities and public service infrastructure can attract substantial weight under Policy HC4. However, that weight must be assessed alongside Policy HC3 and the evidence as to what is actually secured, when it would be delivered and whether it would meet an identified need. For the reasons set out in Section C, uncertainty remains over

the content, timing and delivery of the local centre, secondary school and bus services.

Accordingly, the August 2026 NPPF does not alter ADAG's conclusion on the matters addressed in its Proof. The Rule 6 Party respectfully maintains that the Appeal should be dismissed.