



Supplementary Planning Proof of Evidence: NPPF 2026

Evidence of Megan Wilson BSc (Hons) MSc MRTPI CIHCM

In Respect of the S. 78 Appeal at Land at Patshull Road, Albrighton
On behalf of Boningale Developments Limited

Appeal Reference: 6007402

LPA Reference: 24/02108/OUT

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0. Preamble

Qualification and Experience

- 0.1. My name is Megan Wilson. I hold a Bachelor of Science Degree with Honours in Human Geography, together with a Master of Science Degree in Urban Regeneration. I am a Chartered Member of the Royal Town Planning Institute and the Chartered Institute of Housing. I am employed as a Planning Director at Marrons and lead the Sheffield Office.
- 0.2. I have over 10 years' experience working in a variety of planning roles and have previously worked for a national strategic land promoter, a regional housebuilder and in planning consultancy. I have advised a range of clients in relation to the promotion of land through the Local Plan process and the submission of planning applications. I have appeared at Local Plan Examination hearings and planning appeals as a witness. I provided expert witness evidence (at an Inquiry) in respect of an Appeal against the non-determination of an application by Shropshire Council in November 2025 (APP/L3245/W/25/3362414).
- 0.3. The evidence I have prepared and provide to this Inquiry on behalf of Boningale Developments Limited is true and given in accordance with the code of conduct of the Royal Town Planning Institute.

1. Introduction

- 1.1. My Proof of Evidence was prepared prior to publication of the revised National Planning Policy Framework (“NPPF”) on 17th August 2026.
- 1.2. The revised Framework represents a material change in national planning policy and, importantly for the purposes of this Appeal, introduces National Decision-Making Policies (“NDMPs”), including materially revised policy in respect of the principle of development, housing, Green Belt and sustainable transport.
- 1.3. Annex A of the NPPF confirms that the policies within the Framework are material considerations which must be taken into account in decision-making from the date of publication.
- 1.4. This Supplemental Proof should therefore be read alongside my Proof of Evidence. I do not seek to repeat matters which remain unchanged, including the factual and technical evidence relating to the Appeal Site, the sustainability of Albrighton, housing land supply, the identified need for housing, the proposed infrastructure package, or my assessment of the contribution made by the Appeal Site to the purposes of the Green Belt.
- 1.5. Rather, the purpose of this Supplemental Proof is to consider the effect of the revised national policy upon the principal planning issues before the Inquiry and to update my overall planning balance accordingly.
- 1.6. In my professional opinion, the revised Framework materially strengthens the policy support for the Appeal proposal.

2. Green Belt

GB6 and GB7

- 2.1. Policy GB6 states that development in the Green Belt is inappropriate unless it falls within one of the categories identified within Policy GB7.
- 2.2. Importantly, Policy GB7 then confirms that the categories of development identified within that policy are not inappropriate in the Green Belt and, consequently, should not be regarded as harmful to the Green Belt or be required to demonstrate Very Special Circumstances.
- 2.3. The principal route upon which I rely is Policy GB7(1)(g).
- 2.4. Policy GB7(1)(g) provides that development is not inappropriate where all of the following apply:
 - 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 an evidenced unmet need for the type of development proposed;
 - c) the development would be in a sustainable location, with particular reference to Policy TR3; and
 - d) in the case of major development involving the provision of housing, the development complies with Policy GB8.
- 2.5. I take each of these matters in turn.

Grey Belt

- 2.6. The definition of grey belt is now contained within Annex B of the Framework and comprises land within the Green Belt which is previously developed and/or any other land that does not strongly contribute to any of Green Belt Purposes (a), (b) or (d).
- 2.7. Annex E now provides the detailed criteria against which contribution to those purposes should be assessed.
- 2.8. The detailed assessment within my Proof remains directly relevant to the application of these criteria. Indeed, the wording now incorporated within Annex E reflects, in material terms, the guidance against which my original assessment was undertaken.
- 2.9. For Purpose (a), Annex E expressly states that villages should not be considered large built-up areas. For the reasons already explained in my principal Proof, I consider Albrighton to be a village.
- 2.10. Notwithstanding this, my assessment does not depend on the status of Albrighton. As I explain in my principal Proof the Appeal Site benefits from physical features in

reasonable proximity which (to use the terminology of Annex E) could restrict and contain development. If so then it does not matter if it is concluded that Albrighton is not a village.

- 2.11. Annex E does not require a containing physical feature to comprise a particular type of feature, to be accompanied by substantial vegetation, or to prevent all perception of development beyond it.
- 2.12. Rather, the relevant consideration is whether physical features are present in reasonable proximity which could restrict and contain development.
- 2.13. I consider that they plainly are.
- 2.14. Accordingly, even if the Inspector concludes that Albrighton is not a village, I remain of the view that the Appeal Site does not strongly contribute to Purpose (a). At most, its contribution is moderate.
- 2.15. In respect of Purpose (b), Annex E now expressly confirms that this purpose relates to the merging of towns, not villages.
- 2.16. For the reasons explained in my principal Proof, the Appeal Site does not form a substantial part of a gap between towns and its development would not result in the loss of visual separation between towns.
- 2.17. I therefore remain of the view that the Site makes no strong contribution to Purpose (b).
- 2.18. It is agreed that the Site does not make a strong contribution to Purpose (d).
- 2.19. Accordingly, I conclude that the Appeal Site comprises grey belt land as now defined within Annex B of the NPPF.

The Green Belt Purposes Taken Together

- 2.20. Policy GB7(1)(g)(i) additionally requires consideration of whether the (proposed) development would fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan. For the reasons explained in my principal Proof, it would not.
- 2.21. I therefore consider criterion GB7(1)(g)(i) to be satisfied.

Evidenced Unmet Need

- 2.22. It is common ground that Shropshire Council cannot demonstrate a five-year supply of deliverable housing sites.

- 2.23. Footnote 41 to Policy GB7 expressly confirms that, in the case of housing, an evidenced unmet need exists where the relevant local planning authority cannot demonstrate a five-year supply of deliverable housing sites, including the relevant buffer where applicable.
- 2.24. The precise extent of the shortfall remains a matter of disagreement between the parties. That disagreement does not affect the application of Policy GB7.
- 2.25. There is an evidenced unmet need for housing.
- 2.26. Furthermore, the Appeal proposal would deliver up to 280 affordable homes in circumstances where there is also a substantial evidenced need for affordable housing.
- 2.27. Criterion GB7(1)(g)(ii) is therefore plainly satisfied.

Sustainable Location – TR3

- 2.28. Policy GB7 (1) (g) (iii.) requires particular reference to Policy TR3 in considering whether development is in a sustainable location.
- 2.29. Policy TR3 requires development capable of generating significant movement to be located in locations which are sustainable or which can be made sustainable, taking into account planned improvements, including those provided as part of the development itself.
- 2.30. The policy requires such locations to limit the need to travel, particularly by private car, and offer a genuine choice of transport modes.
- 2.31. For the reasons explained in my principal Proof and within the evidence of Miss Meer, I consider that the proposals meet the terms of what is now set out in TR3
- 2.32. Importantly, Policy TR3 does not require consideration of the Site as it exists today in isolation from the infrastructure proposed as part of the development. It expressly requires planned improvements, including those provided through the development itself, to be taken into account.
- 2.33. I therefore remain firmly of the view that the Appeal Site is in a sustainable location.
- 2.34. Criterion GB7(1)(g)(iii) is satisfied.

GB8 – Golden Rules

- 2.35. Policy GB8 sets out the Golden Rules which apply to major housing development on sites in the Green Belt.

- 2.36. The Appeal proposal provides 35% affordable housing, equating to up to 280 affordable dwellings. This represents 15 percentage points above the existing policy requirement and complies with the affordable housing requirement within GB8.
- 2.37. The development additionally provides necessary improvements to local infrastructure, including substantial highway and public transport improvements, together with land for a secondary school and a new medical facility.
- 2.38. Approximately 12.35 hectares of the Site comprises usable public open space, representing approximately 25.4% of the Site area. All dwellings would be within a short walk of usable public open space and the development provides substantial ecological, landscape and biodiversity enhancements.
- 2.39. The Golden Rules are therefore satisfied in full.
- 2.40. Policy GB8(2) additionally requires substantial weight to be given to the importance of complying with the Golden Rules.
- 2.41. Criterion GB7(1)(g)(iv) is therefore satisfied.

GB7 Conclusion

- 2.42. Taking all of the above into account, I conclude that each of the requirements within GB7(1)(g) is satisfied.
- 2.43. The Appeal Site comprises grey belt land; development would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan; there is an evidenced unmet need for housing; the Site is in a sustainable location; and the Golden Rules are met.
- 2.44. Consequently, Policy GB7 expressly provides that the Appeal proposal is not inappropriate development and should not be regarded as harmful to the Green Belt.
- 2.45. Very Special Circumstances are therefore not required.

3. Policy S5 – Principle of Development

- 3.1. The revised Framework no longer contains the paragraph 11(d) tilted balance against which my principal Proof was prepared.
- 3.2. Policy S5 now provides the relevant national policy framework for considering the principle of development outside settlements and sets out a newly formulated presumption
- 3.3. Importantly, Policy S5(5) expressly addresses development within the Green Belt.
- 3.4. It confirms that whilst the categories listed elsewhere within S5 do not directly apply to Green Belt development, where development would not be inappropriate through the application of Policy GB7, proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the national decision-making policies within the Framework, and applying S5(2).
- 3.5. Having concluded above that the Appeal proposal falls within GB7(1)(g), S5(5) is therefore directly engaged.
- 3.6. The starting point within national policy is consequently that the Appeal proposal **should be approved**, unless its benefits would be substantially outweighed by any adverse effects.
- 3.7. This is, of course, materially different from simply undertaking an unweighted assessment of competing considerations. It is a, newly formulated, tilted balance.

S5(2)

- 3.8. S5(2) identifies circumstances where benefits are likely to be substantially outweighed by adverse effects. These include, but are expressly not restricted to, circumstances where a proposal fails to comply with a National Decision-Making Policy which states that development should be refused in specific circumstances.
- 3.9. I have reviewed the Appeal proposal against the relevant National Decision-Making Policies.
- 3.10. I have identified no National Decision-Making Policy which requires the Appeal proposal to be refused.
- 3.11. There is no severe adverse transport impact and the Local Highway Authority has not objected on such grounds.(TR6 (4).)



- 3.12. Heritage harm is less than substantial and falls to be balanced against the public benefits of the development.(HE6 (3) and (4).)
- 3.13. The identified visual / landscape effects do not engage a National Decision-Making Policy requiring refusal.
- 3.14. Flood risk, drainage, ecology and biodiversity matters have been satisfactorily addressed.
- 3.15. Density requirements (L3 (2) (b) are met, and in the context of an outline application so too are the design requirements of DP3.
- 3.16. The development complies with GB7 and GB8.
- 3.17. Accordingly, none of the circumstances specifically identified by S5(2) arise.



4. Housing – Policy HO7

- 4.1. Policy HO7 represents a further material change to national policy.
- 4.2. It expressly requires substantial weight to be given to the benefits of providing homes which contribute towards meeting the evidenced accommodation needs of the community.
- 4.3. The Appeal proposal provides up to 800 dwellings in a local authority area which cannot demonstrate a five-year housing land supply.
- 4.4. It additionally provides up to 280 affordable dwellings.
- 4.5. In my principal Proof I afforded very substantial weight to the delivery of both market and affordable housing.
- 4.6. Policy HO7 plainly reinforces that conclusion.
- 4.7. The requirement to afford substantial weight within HO7 does not, in my view, operate as a ceiling upon the weight which may be afforded to housing delivery. Having regard to the scale of the proposal, the acknowledged five-year housing land supply shortfall, the delivery of up to 800 homes from a single development and the substantial affordable housing provision, I continue to afford very substantial weight to both the market and affordable housing benefits.

5. Development Plan

- 5.1. I acknowledge, as I did within my principal Proof, that the Appeal proposal conflicts with elements of the adopted Development Plan when read as a whole.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 remains the statutory starting point.
- 5.3. However, the revised NPPF now gives considerably clearer direction as to the weight which should be afforded to Development Plan policies which are materially inconsistent with national policy.
- 5.4. Paragraph 2 of Annex A expressly states that Development Plan policies, or parts of policies, which are materially inconsistent with National Decision-Making Policies should be given **very limited weight**.
- 5.5. This is no longer simply a matter of policies being deemed out-of-date by reason of an absence of a five-year housing land supply. (Indeed, that approach is no longer found in the NPPF.)
- 5.6. Policy CS5 and Policy MD6 pre-date the introduction of grey belt by more than a decade and seek to control Green Belt development by reference to a materially different national policy framework. To the extent that those policies do not recognise development which satisfies GB7 as not inappropriate development, they are materially inconsistent with current national policy.
- 5.7. I therefore attach very limited weight to them and therefore to that conflict.
- 5.8. Policies CS3, MD7a and S1 seek, in differing ways, to constrain development beyond adopted development boundaries and by reference to a scale and distribution of housing formulated against a materially lower housing requirement.
- 5.9. I acknowledge that the spatial objectives of those policies do not cease to be relevant simply by virtue of their age.
- 5.10. However, to the extent that their application contains a more restrictive approach – as I consider is the case – than that found in NPPF S5 then I consider those parts of the policies to be materially inconsistent with the new National Decision-Making Policies.
- 5.11. Annex A directs that very limited weight should be afforded to those inconsistent parts.
- 5.12. This materially reduces the weight which can reasonably be attached to Development Plan conflict in the overall planning balance.

6. Updated Planning Balance

- 6.1. My principal Proof identified the benefits and harms associated with the Appeal proposal and attributed weight to each.
- 6.2. The factual basis for that assessment has not changed.
- 6.3. The revised Framework does, however, materially alter the policy context within which those benefits and harms are assessed.
- 6.4. In respect of the benefits, I continue to afford:
 - very substantial weight to the provision of up to 520 market homes;
 - very substantial weight to the provision of up to 280 affordable homes;
 - substantial weight to the provision of land for a secondary school;
 - substantial weight to the provision of land for a care facility;
 - significant weight to Biodiversity Net Gain;
 - moderate weight to the local centre;
 - moderate weight to the economic benefits;
 - moderate weight to public transport improvements;
 - moderate weight to highway infrastructure;
 - limited weight to the EV Car Club; and
 - limited weight to other community contributions.
- 6.5. In addition, Policy GB8 requires substantial weight to be afforded to the importance of compliance with the Golden Rules.
- 6.6. Policy HO7 expressly requires substantial weight to be given to housing meeting evidenced needs.
- 6.7. In respect of adverse effects, I acknowledge the moderate landscape and visual harm, limited heritage harm and limited harm associated with the loss of Best and Most Versatile agricultural land identified within my principal Proof.
- 6.8. I also acknowledge conflict with elements of the Development Plan, but for the reasons explained above, very limited weight must now be afforded to those parts of Development Plan policies which are materially inconsistent with the National Decision-Making Policies.
- 6.9. Importantly, having concluded that Policy GB7 is satisfied, the proposal is not inappropriate development and GB7 expressly states that it should not be regarded as harmful to the Green Belt.
- 6.10. It would therefore be wrong, in my view, to introduce substantial Green Belt harm into the S5(5) balance on the basis of inappropriateness or simply because development would change the openness of the Appeal Site.
- 6.11. The relevant landscape and visual effects remain capable of being considered on their merits and I have done so.



- 6.12. Applying S5(5), the question is whether the benefits of approving the development would be **substantially outweighed** by its adverse effects.
- 6.13. In my professional opinion, they plainly would not.
- 6.14. The identified adverse effects do not come close to substantially outweighing the very considerable and wide-ranging benefits delivered by the Appeal proposal.
- 6.15. Rather, the planning balance weighs decisively in favour of permission.

7. Very Special Circumstances

- 7.1. For the avoidance of doubt, I retain the alternative case set out within my principal Proof in the event that the Inspector disagrees with my conclusion under Policy GB7.
- 7.2. Policy GB6 retains the requirement that inappropriate development should not be approved except in Very Special Circumstances and requires substantial weight to be afforded to Green Belt harm in undertaking that exercise.
- 7.3. Were the Inspector to conclude that GB7 is not satisfied, I would therefore afford substantial weight to the resulting Green Belt harm.
- 7.4. Even on that alternative basis, however, my conclusion remains unchanged.
- 7.5. The combination of very substantial market and affordable housing benefits, education and care provision, substantial infrastructure provision, sustainable transport improvements, Biodiversity Net Gain, public open space, economic benefits and the other considerations identified within my evidence clearly outweigh the resulting Green Belt harm and other identified harms.
- 7.6. The additional direction within HO7 to afford substantial weight to housing meeting evidenced needs further reinforces that conclusion.
- 7.7. Very Special Circumstances would therefore exist in the alternative.

8. Conclusion

- 8.1. The revised NPPF represents a material change to the national policy framework against which this Appeal falls to be determined.
- 8.2. In respect of Green Belt, I conclude that the Appeal Site comprises grey belt land and that each of the requirements within Policy GB7(1)(g) is satisfied.
- 8.3. The Appeal proposal is therefore not inappropriate development, should not be regarded as harmful to the Green Belt and is not required to demonstrate Very Special Circumstances.
- 8.4. Policy S5(5) consequently applies and provides that the Appeal proposal should be approved unless its benefits would be substantially outweighed by adverse effects when assessed against the National Decision-Making Policies.
- 8.5. They would not.
- 8.6. The revised Framework additionally requires substantial weight to be afforded to the housing benefits through HO7 and to the importance of compliance with the Golden Rules through GB8.
- 8.7. Annex A further directs that very limited weight should be afforded to Development Plan policies, or parts thereof, which are materially inconsistent with the new National Decision-Making Policies.
- 8.8. I acknowledge that the Appeal proposal would result in change and that there are adverse landscape, heritage and agricultural land effects. I have not sought to minimise those matters.
- 8.9. What is important, however, is that none amounts to an adverse effect which makes the development unacceptable in national policy terms and, even taken cumulatively, they fall a considerable way short of substantially outweighing the benefits of the development.
- 8.10. In my professional opinion, the revised national policy position therefore materially strengthens the case for allowing the Appeal.
- 8.11. In the alternative, if the Inspector concludes that the proposal represents inappropriate development in the Green Belt, I remain firmly of the view that Very Special Circumstances exist.
- 8.12. I respectfully invite the Inspector to allow the Appeal and grant planning permission.



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