

# **Shropshire Council**

## **Green Belt Release** **Exceptional Circumstances** **Statement**

Published: December 2020

# CONTENTS

<b>1. INTRODUCTION</b> .....	<b>4</b>
PURPOSE OF THE REPORT .....	4
GREEN BELT IN SHROPSHIRE .....	4
<b>2. DEVELOPMENT OF THE LOCAL PLAN</b> .....	<b>7</b>
THE CURRENT LOCAL PLAN .....	7
THE LOCAL PLAN REVIEW .....	7
CONSULTATION .....	7
EVIDENCE BASE .....	8
<i>Site Assessment</i> .....	8
<b>3. POLICY CONTEXT</b> .....	<b>10</b>
NATIONAL POLICY .....	10
LOCAL POLICY .....	11
EMERGING LOCAL POLICY - DRAFT SHROPSHIRE LOCAL PLAN 2016-2038 .....	14
DUTY TO COOPERATE .....	21
<b>4. GREEN BELT RELEASE PROPOSED IN SHROPSHIRE</b> .....	<b>23</b>
<b>5. ALBRIGHTON</b> .....	<b>24</b>
INTRODUCTION .....	24
THE NEED FOR DEVELOPMENT .....	24
PROPOSED GREEN BELT RELEASE .....	25
GREEN BELT ASSESSMENT AND REVIEW .....	27
OTHER PLANNING CONSIDERATIONS .....	28
ASSESSMENT OF ALL OTHER REASONABLE OPTIONS .....	30
EXCEPTIONAL CIRCUMSTANCES .....	32
<i>Supporting the Role and Function of Albrighton in the Future</i> .....	32
<i>Meeting Local Needs in the Future</i> .....	33
<i>Sustainable Patterns of Development</i> .....	33
<i>Green Belt Performance</i> .....	34
SITE BOUNDARIES .....	34
COMPENSATORY IMPROVEMENTS TO THE GREEN BELT .....	35
<b>6. ALVELEY</b> .....	<b>37</b>
INTRODUCTION .....	37
THE NEED FOR DEVELOPMENT .....	37
PROPOSED GREEN BELT RELEASE .....	38
GREEN BELT ASSESSMENT AND REVIEW .....	39
OTHER PLANNING CONSIDERATIONS .....	40
ASSESSMENT OF OTHER REASONABLE OPTIONS .....	42
IDENTIFICATION OF GREEN BELT LOCATIONS .....	43
COMPENSATORY IMPROVEMENTS TO THE GREEN BELT .....	44
CONCLUSION .....	45

<b>7. BRIDGNORTH (STANMORE)</b> .....	<b>46</b>
INTRODUCTION .....	46
BACKGROUND - BRIDGNORTH .....	46
BACKGROUND - STANMORE INDUSTRIAL ESTATE .....	47
THE NEED FOR DEVELOPMENT .....	48
PROPOSED GREEN BELT RELEASE .....	51
GREEN BELT ASSESSMENT AND REVIEW .....	52
OTHER PLANNING CONSIDERATIONS .....	53
ASSESSMENT OF ALL OTHER REASONABLE OPTIONS .....	54
<i>Alternative Options to the Expansion of Stanmore Industrial Estate</i> .....	55
<i>Alternative Options for the Expansion of Stanmore Industrial Estate</i> .....	57
EXCEPTIONAL CIRCUMSTANCES .....	57
<i>Supporting the Role of Stanmore Industrial Estate</i> .....	58
<i>Supporting the medium- and long-term needs of existing businesses</i> .....	59
<i>Attracting new businesses, particularly those in the ‘engineering and advanced manufacturing’ sector</i> .....	60
<i>Supporting the Strategic Role of Bridgnorth</i> .....	60
<i>Supporting the Aspirations of the Economic Growth Strategy for Shropshire</i> .....	60
<i>Green Belt Performance</i> .....	62
SITE BOUNDARIES .....	62
COMPENSATORY IMPROVEMENTS TO THE GREEN BELT .....	63
<b>8. SHIFNAL</b> .....	<b>65</b>
INTRODUCTION .....	65
<i>BACKGROUND - SHIFNAL</i> .....	66
THE NEED FOR DEVELOPMENT .....	69
PROPOSED GREEN BELT RELEASE .....	71
GREEN BELT ASSESSMENT AND REVIEW .....	73
<i>OTHER PLANNING CONSIDERATIONS</i> .....	75
ASSESSMENT OF ALL OTHER REASONABLE OPTIONS .....	78
EXCEPTIONAL CIRCUMSTANCES .....	81
<i>Addressing the ‘dormitory’ characteristics of Shifnal</i> .....	82
<i>M54 Strategic Corridor and ‘unmet’ need in the Black Country</i> .....	83
<i>Supporting the Aspirations of the Economic Growth Strategy for Shropshire</i> .....	83
<i>Strategic Role and Function of Shifnal</i> .....	86
<i>Improving existing provision for employment development</i> .....	86
<i>Meeting the needs of business</i> .....	88
<i>Community Vitality</i> .....	88
<i>Settlement Sustainability – investment programme</i> .....	89
<i>Settlement Sustainability – structural constraints</i> .....	90
<i>Green Belt Performance</i> .....	90
SITE BOUNDARIES .....	91
COMPENSATORY IMPROVEMENTS TO THE GREEN BELT .....	94
<b>9. RAF COSFORD STRATEGIC SITE</b> .....	<b>96</b>
INTRODUCTION .....	96
DEVELOPMENT ASPIRATIONS .....	96
<i>Ministry of Defence</i> .....	96
<i>Whittle Engineering Academy</i> .....	97
<i>RAF Museum Cosford</i> .....	97
<i>Midlands Air Ambulance Charity</i> .....	97
PROPOSED GREEN BELT RELEASE .....	98

GREEN BELT ASSESSMENT AND REVIEW .....	99
OTHER PLANNING CONSIDERATIONS .....	100
ASSESSMENT OF ALL OTHER REASONABLE OPTIONS .....	101
<i>Brownfield and Under-Utilised Land</i> .....	101
<i>Optimising Density</i> .....	101
<i>Accommodation of Development in Neighbouring Local Authorities</i> .....	101
<i>Alternative Options</i> .....	102
<i>Alternatives: Release of elements of the existing RAF Cosford site</i> .....	102
<i>Alternatives: Release of the MAAC site</i> .....	103
EXCEPTIONAL CIRCUMSTANCES .....	108
<i>The Exceptional Nature of the Development</i> .....	108
<i>Sustainable Site – Now and in the Future</i> .....	109
<i>Contribution to the Aspirations of the Shropshire Local Plan and Economic Growth     Strategy for Shropshire (2017-2021)</i> .....	109
<i>Green Belt Performance</i> .....	110
SITE BOUNDARIES .....	111
COMPENSATORY IMPROVEMENTS TO THE GREEN BELT .....	112
<b>APPENDICES .....</b>	<b>113</b>

# 1. Introduction

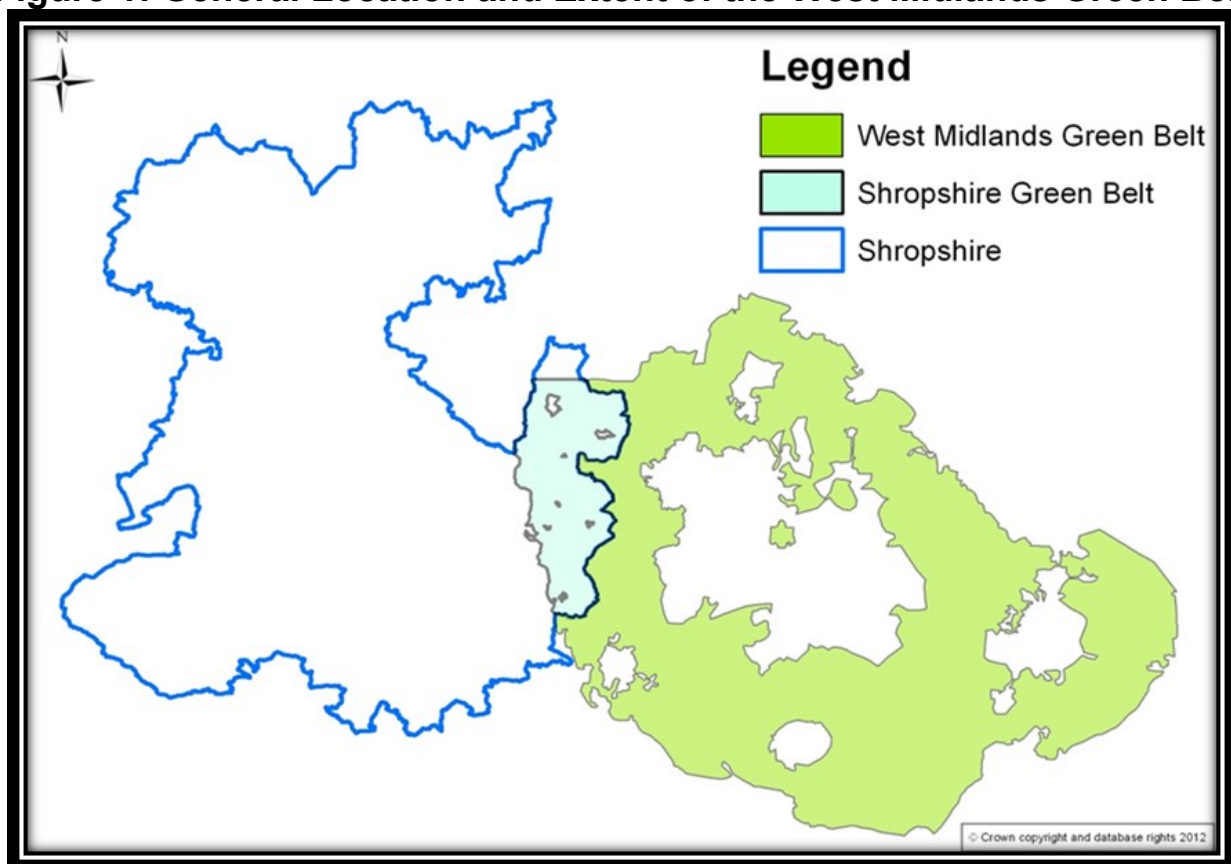
## ***Purpose of the Report***

- 1.1. The purpose of this report is to summarise the exceptional circumstances that support the proposed removal of land from the Green Belt in Shropshire, for development or to safeguard for development beyond the period addressed within the ongoing Shropshire Local Plan Review.

## ***Green Belt in Shropshire***

- 1.2. The Green Belt in Shropshire lies in the south-east of the County, to the east of the River Severn and south of the A5. It forms part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry. Figure 1 shows the general location and extent of the West Midlands Green Belt.

**Figure 1: General Location and Extent of the West Midlands Green Belt**



- 1.3. Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955<sup>1</sup>, although it was not formally approved by the Secretary of State until 1975.
- 1.4. According to Green Belt statistics published by the MHCLG, in 2015/16 the West Midlands Metropolitan Green Belt covered a total of 220,210 hectares<sup>2</sup>, surrounding the Black Country, Coventry, Birmingham and Solihull. The West Midlands Metropolitan Green Belt has remained relatively successful in checking the sprawl

<sup>1</sup> What Price West Midlands Green belt, Campaign to protect Rural England: West Midlands (June 2007)

<sup>2</sup> Total area of Green Belt for relevant Local Planning Authorities, as published by the Ministry of Housing, Communities and Local Government (MHCLG) for the reporting period 2015/16 and as specified within the Plan for Stafford Borough (2011-2031) as only part of the Stafford Green Belt is within the West Midlands Green Belt.

of Birmingham, Wolverhampton and Coventry, preventing the merging of settlements and encroachment into the surrounding countryside and helping to preserve the setting and special character of the constellation of satellite settlements that inhabit it.

- 1.5. The Green Belt in Shropshire represents the western outer edge of the West Midlands Metropolitan Green Belt. According to Green Belt statistics published by the MHCLG, in 2015/16, Shropshire contained around 24,480ha<sup>3</sup> of Green Belt land. This represents approximately 11% of the West Midlands Metropolitan Green Belt and approximately 1.5% of the total Green Belt land in England, which is 1,635,480ha.
- 1.6. The Green Belt in Shropshire covers around 8% of the total area of Shropshire, which is 319,728ha.
- 1.7. In Shropshire, the Green Belt wraps around the following inset settlements: Albrighton, Alveley, Beckbury, Claverley, Shifnal and Worfield, as well as Alveley and Stanmore Industrial Estates. It also wraps around the eastern boundary of Bridgnorth.
- 1.8. The Shropshire Green Belt is bordered to the west by the River Severn and the River Worfe runs northwards through the centre of the Green Belt land north of Worfield. These rivers incise through the landscape, the Severn dividing the Green Belt land from the remaining area of the County to the West, and the Worfe separating the settlements of Shifnal and Albrighton. The land in the Green Belt then becomes more elevated west of Shifnal and east of Albrighton. Additionally, a section of high land is present between Alveley and Enville.
- 1.9. The M54 crosses the northernmost part of the Green Belt in a broadly east to west direction, with the A442 running closely along the western border of the Green Belt in a roughly south to north direction. A number of A roads radiate outwards across the Green Belt from Bridgnorth to link with Wolverhampton (A454) Stourbridge (A458), Kidderminster & Telford (A442) with the A41 linking the M54 (and Albrighton) to Wolverhampton to the south east. The Green Belt land is predominantly classed as Grade 2 or 3 agricultural land and is predominantly arable land or grassland<sup>4</sup>.
- 1.10. There are numerous core wildlife areas, corridors and buffers across the Shropshire Green Belt, which are particularly notable along the courses of the River Severn and the River Worfe<sup>5</sup>. Furthermore, the Donington & Albrighton local nature reserve lies adjacent to Albrighton, the Claverley Road Cutting Site of Special Scientific Interest (SSSI) lies to the north of Claverley and the Alveley Grindstone Quarry SSSI lies to the north of Alveley, all located within the Green Belt.
- 1.11. The Ironbridge Gorge World Heritage Site is located adjacent to the Green Belt along the border between Shropshire County and Telford and Wrekin, to the east of the Village of Coalport.

---

<sup>3</sup> According to the Green Belt statistics published by the MHCLG, between the reporting periods of 2012/13 and 2013/14 the Shropshire Green Belt reduced by 10ha. The apparent reduction of 10ha in the total area of Green Belt in Shropshire (from 24,490ha in 2013 to 24,480ha in 2014) is caused by changes in the statistical rounding used by MHCLG in compiling the Green Belt figures. It is not due to a reduction in the physical area of Green Belt land. There was no reported change in the amount of land designated as Green Belt in Shropshire between reporting periods 2014/15 and 2015/16.

<sup>4</sup> According to the Department for Environment, Food and Rural Affairs (DEFRA), within Magic Map:

<http://magic.defra.gov.uk/magicmap.aspx>

<sup>5</sup> Shropshire Council, Shropshire Environment Network <https://new.shropshire.gov.uk/environment/biodiversity-ecology-andplanning/shropshire-environmental-network/>

- 1.12. The Green Belt in Shropshire was last subject to assessment by Bridgnorth District Council as part of its Local Plan 1996-2011 (adopted in 2006), prior to the creation of Shropshire Council in 2009. Within the Bridgnorth District Council Local Plan 1996-2011 around 2.7ha of land was removed from the Green Belt for development and around 16ha of land was removed from the Green Belt and safeguarded for future development. No other substantive changes were made to the extent or boundaries of the Green Belt.
- 1.13. It should be noted that safeguarded land was already identified at Shifnal. Furthermore, safeguarded land in both Shifnal and Albrighton have subsequently been subject to allocation/development.

## 2. Development of the Local Plan

### ***The Current Local Plan***

- 2.1. The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with any adopted Neighbourhood Plans. These documents set out proposals for the use of land and policies to guide future development in order to help to deliver sustainable growth in Shropshire for the period up to 2026.

### ***The Local Plan Review***

- 2.2. Local Planning Authorities are required to keep under review any matters that may affect the development of its area. Shropshire Council determined to undertake a Local Plan Review in order to:
- Allow the consideration of updated information on development needs within the County;
  - Reflect changes to national policy and our local strategies;
  - Extend the Plan period to 2038; and
  - Provide a plan which will help to support growth and maintain local control over planning decisions during the period to 2038.
- 2.3. Maintaining an up-to-date Local Plan will support local growth by generating certainty for investment in local development and infrastructure through a policy framework that establishes an up to date and objective assessment of development needs and supports sustainable development in Shropshire during the period to 2038.

### ***Consultation***

- 2.4. The preparation of the Shropshire Local Plan has not been a rushed process, and instead Shropshire Council have sought to build consensus around shared local priorities and proposals. The Council began preparing the Local Plan review in 2017. At the core of this process is continuous and meaningful community engagement, in line with the Council's Statement of Community Involvement (SCI).
- 2.5. To this end, the Council has thus far undertaken five consultation stages as part of the Regulation 19 stage of plan preparation, these are:
1. Issues and Options – January 2017;
  2. Preferred Scale and Distribution of Growth – December 2017;
  3. Preferred Site Allocations – November 2018;
  4. Strategic Sites – June 2019; and
  5. Regulation 18: pre-submission draft Shropshire Local Plan- August 2020.
- 2.6. Within the Issues and Strategic Options Consultation, different options were considered for the housing requirement; strategic distribution of future growth and strategies for employment growth.
- 2.7. Within the Preferred Scale and Distribution of Growth Consultation, the preferred scale of housing and employment growth and the preferred distribution of this growth were outlined.



- 2.8. Within the Preferred Sites and subsequent Strategic Sites Consultations, the preferred sites for achieving the preferred scale and distribution of development were outlined.
- 2.9. The Regulation 18 Draft Local Plan was a full draft version of the Plan which set out proposed allocations and draft settlement policies, together with range of draft strategic and more detailed implementation policies.
- 2.10. The comments made during each stage of consultation informed all subsequent stages of consultation and the wider Local Plan Review process.

### **Evidence Base**

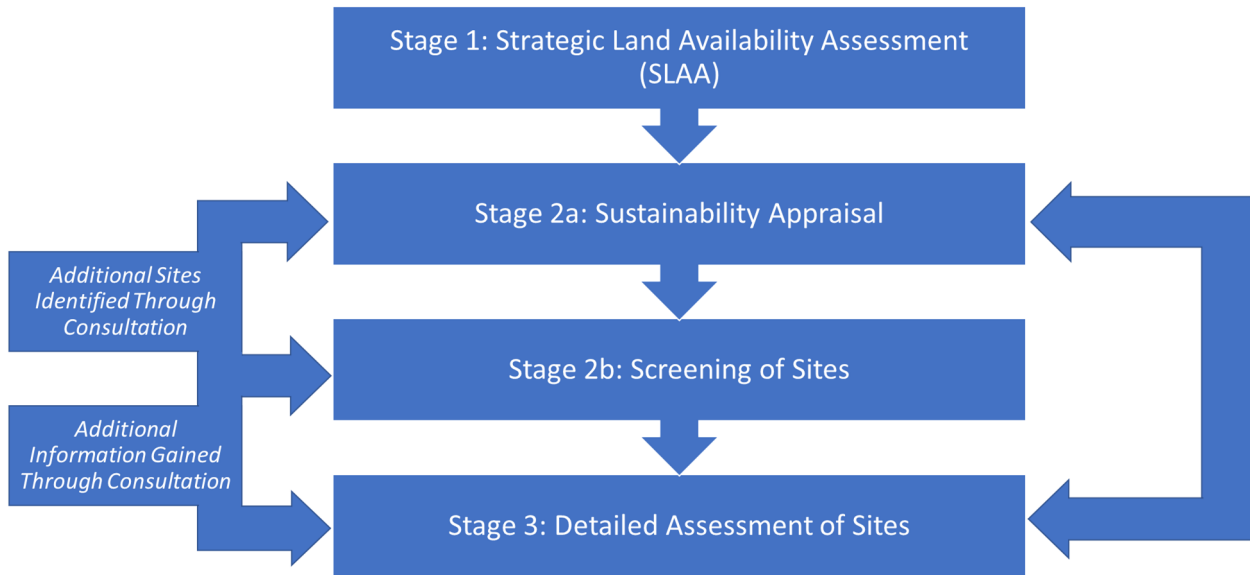
- 2.11. An extensive evidence base has also been prepared to inform the Local Plan Review. This includes evidence pertinent to the issue of Green Belt, including that relating to:
- Housing and Employment Needs;
  - The identification of and assessment of the suitability, availability and achievability (including viability) of potential development sites;
  - The performance of Green Belt; and
  - The harm to the Green Belt resulting from the removal of land from the Green Belt.

### **Site Assessment**

- 2.12. To inform the identification of proposed site allocations within the Local Plan Review, Shropshire Council has undertaken a comprehensive Site Assessment process. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of vision, objectives and policies and site allocations.
- 2.13. The following table and figure summarise the key stages of the Site Assessment process undertaken, more detail on each of these stages is then provided:

<b>Site Assessment Process</b>	
<b>Stage 1: The Strategic Land Availability Assessment (SLAA)</b>	Stage 1 consisted of a strategic screen and review of sites.
<i>Following the completion of the SLAA, further sites were promoted for consideration through the consultation and engagement process. Where possible these sites have been included within Stages 2a, 2b and 3 of the Sustainability Appraisal: Site Assessment process.</i>	
<i>Following the completion of the SLAA, further information was achieved through the consultation and engagement process. Where possible this information has been considered within Stages 2a, 2b and 3 of the Sustainability Appraisal: Site Assessment process.</i>	
<b>Stage 2a: Sustainability Appraisal</b>	Stage 2a consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
<b>Stage 2b: Screening of Sites</b>	Stage 2b consisted of a screening exercise informed by consideration of a site's availability; size and whether there were obvious physical, heritage or environmental constraints present, based on the strategic assessment undertaken within the SLAA.

Site Assessment Process	
<b>Stage 3: Detailed site review</b>	<p>Stage 3 consisted of a proportional and comprehensive assessment of sites informed by the sustainability appraisal and assessments undertaken by Highways; Heritage; Ecology; Trees; and Public Protection Officers; various technical studies, including a Landscape and Visual Sensitivity Study, Strategic Flood Risk Assessment and Green Belt Assessment/Review where appropriate; consideration of infrastructure requirements and opportunities; consideration of other strategic considerations; and professional judgement.</p> <p><b>This stage of assessment was an iterative process.</b></p>



2.14. This site assessment process has directly informed the identification of proposed releases of land from the Green Belt within the Local Plan Review and in turn has been informed by the consideration of exceptional circumstances for release of land from the Green Belt summarised within this statement.

## 3. Policy Context

### *National Policy*

- 3.1. Government Green Belt policy is set out in the National Planning Policy Framework (NPPF) which was last updated in June 2019. These states (at paragraph 133) that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*. The purposes of Green Belt specified are to:
- “a) check the unrestricted sprawl of large built-up areas;*
  - b) prevent neighbouring towns merging into one another;*
  - c) assist in safeguarding the countryside from encroachment;*
  - d) preserve the setting and special character of historic towns; and*
  - e) assist in urban regeneration, by encouraging the recycling of derelict and other urban land”*.
- 3.2. No particular priority or greater importance is attached to any one purpose.
- 3.3. The NPPF identifies that the general extent of Green Belt is established and sets out the expectation that established Green Belt boundaries *“should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”* and ( at para 136) that *“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”*.
- 3.4. Paragraph 137 of the NPPF sets out the condition that, *“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development”*. This includes examination of the strategic approach to consider whether it makes as much practical use of suitable brownfield sites and underutilised land and also optimises the density of development, particularly in urban and other locations which have good public transport. Consideration of the scope to locate development in other non-Green Belt locations is reflected in the expectation that there will have been discussions with neighbouring and closely related authorities about whether they could accommodate some or all of the identified need for the development planned in the Green Belt. These discussions which would normally take place as part of Duty to Cooperate processes (discussed later in the document) need to be formalised for Examination purposes in a Statement of Common Ground (SOCG).
- 3.5. Paragraph 138 of the NPPF provides additional clarification regarding matters to consider when reviewing Green Belt boundaries, in particular *“the need to promote sustainable patterns of development”*. It also highlights that where the conclusion is that Green Belt release is necessary, plans should *prioritise “previously-developed land”* and/or land that is *“well-served by public transport”*. This paragraph also sets a requirement to identify how compensatory improvements to the environmental quality and accessibility of remaining Green Belt land can be offset removal.
- 3.6. Finally, NPPF at paragraph 139 sets out the following specific requirements for Plans when defining new Green Belt boundaries:
- “a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*

- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time.....;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

3.7. Accompanying Planning Practice Guidance (Paragraph: 002 Reference ID: 64-002-20190722, 22<sup>nd</sup> July 2019) provides additional explanation of how Plans can seek to address the impact of removing land from the Green Belt which includes setting out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. Evidence relating to landscape, biodiversity or recreational needs can be used to inform the approach identified which can include: *“new or enhanced green infrastructure; woodland planting; landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal) biodiversity improvements, habitat connectivity and natural capital; new or enhanced walking and cycle routes; and improved access to new, enhanced or existing recreational and playing field provision.”* The Guidance (Paragraph: 003 Reference ID: 64-003-20190722) also provides advice on identifying and securing appropriate compensatory improvements through early engagement with landowners and other interested parties and the use of conditions, legal obligations and CIL.

## **Local Policy**

- 3.8. The current Local Plan consists of the Core Strategy, adopted in February 2011 and Shropshire Site Allocations and Management of Development (SAMDev) Plan adopted 2015). The Core Strategy preceded the publication of the NPPF in 2012 and thus references national policy previously set out in Planning Policy guidance.
- 3.9. The main strategic policy relating to Green Belt is set out in Core Strategy Policy CS5 Countryside and Green Belt. In relation to Green Belt specifically this states:
- “Within the designated Green Belt in south-eastern Shropshire, there will be additional control of new development in line with government guidance in PPG2. Land within development boundaries in the settlements of Shifnal, Albrighton, Alveley, Beckbury, Claverley, and Worfield, and at the Alveley and Stanmore Industrial Estates is excluded from the Green Belt. In addition to appropriate development in these areas, limited infilling will be permitted in any other Community Hubs and Community Clusters listed in the SAMDev DPD, subject to the requirements of Policies CS4, CS6 and CS11. Also, limited local needs affordable housing on exceptions sites which accords with the requirements of Policy CS11 will be permitted in the Green Belt. Areas of safeguarded land are reserved for potential future development at Albrighton and Shifnal, while the military base and Royal Air Force Museum at Cosford is recognised as a major existing developed site within the Green Belt where limited defence related development will be permitted. The Green Belt boundary and all relevant policy areas are identified on the Proposals Map for the SAMDev DPD, which sets out the*

*detailed approach to development in the Green Belt and any new site allocations required within the safeguarded land.”*

- 3.10. Explanatory text to Policy CS5 clarifies that Green Belt was not reviewed and that no alterations were made through Plan preparation with Green Belt boundaries remaining the same as those identified by the Bridgnorth Local Plan which was adopted in 2006:
- “Once defined in a development plan, Green Belt boundaries are expected to remain in position for a long time, and no changes have been proposed to the boundaries identified in Bridgnorth District Local Plan 1996-2011. The Local Plan also identifies development boundaries for a number of settlements and other locations within the Green Belt, and ‘safeguarded land’ at Albrighton and Shifnal. The safeguarded land makes long term provision for the future expansion of these settlements whilst retaining the normal strict controls over development until land is released, if required, by allocation in the SAMDev DPD. Any changes required to development boundaries in the future will be determined through the preparation and subsequent reviews of this DPD.”*
- 3.11. Green Belt is referenced elsewhere in the Core Strategy, notably in Policy CS3 (The Market Towns and Other Key Centres) which reiterates that no changes will be made to Green Belt boundaries and highlights Green Belt as a constraint to development in Bridgnorth, Shifnal and Albrighton. The latter settlements having a potential role in accommodating development to meet the needs of military personnel.
- 3.12. The SAMDev Plan adopted in 2015 provided more detailed development management type policy, Policy MD6 Green Belt in relation to the consideration of development within the Green Belt within the premise that development proposed should not conflict with the purposes of Green Belt. The policy makes specific provision for appropriate but limited infilling of identified Community Hubs or Clusters; military or economic uses at RAF Cosford, as a major developed site and for suitable development for economic uses, defence uses, local community use or affordable housing uses on previously developed sites.
- 3.13. The policy MD6 recognises the need to support the rural economy and local housing needs for those rural areas that fall within the Green Belt and makes provision as far as possible within the context of national Green Belt policy. There were and are however no Community Hubs or Clusters in the Shropshire Green Belt. The settlements of Alveley, Beckbury, Claverley and Worfield which had in the previous Local Plan defined development boundaries continued to have Green Belt boundaries and to not be included in the Green Belt, however countryside policy applies within them.
- 3.14. Therefore, under the current Local Plan there are limited opportunities for infill development in the Green Belt as provided for by policy beyond the main settlements of Albrighton and Shifnal which are wholly in Green Belt and Bridgnorth which has Green Belt on the eastern side of the town. For employment purposes the industrial estates at Alveley and Stanmore are also inset in the Green Belt but Cosford remains simply identified as a major developed site within the Green Belt.
- 3.15. The need for a Green Belt review to consider options for future development needs was recognised in the Plan at this time as set out in explanatory text to policy MD6: Paragraph 3.48 states: *“A detailed review of the Green Belt boundary will be undertaken in the Local Plan review, as part of looking at sustainable growth*



*options. The review of the Green Belt will use a methodology that is consistent with neighbouring authorities.”*

This reflects the SAMDev Plan Inspector’s recommendation for an early review of the Local Plan including a detailed review of the Green Belt boundary.

- 3.16. The SAMDev Plan Inspector further commented in her report in respect of the required early review of the Local Plan:

*“The review will include housing requirements (including objectively assessed need), employment land requirements, the distribution of development and a review of Green Belt boundaries, as part of the consideration of strategic options to deliver new development in the review plan period which is likely to be 2016-2036. In line with the framework (paragraph 153), a Local Plan can be reviewed “in whole or in part to respond flexibly to changing circumstances”.”*

- 3.17. The Inspector noted the impact and role of Green Belt in relation to the settlements of Albrighton, Bridgnorth and Shifnal. A modification to policy was identified to clarifying the role and expected treatment of safeguarded land at Albrighton to ensure that ‘no development should be permitted that would prejudice the future development of the land’. In relation to Bridgnorth the Inspector commented on the role of Bridgnorth and the impact of Green Belt in constraining development options:

*“Bridgnorth is the second largest of 5 market towns in Shropshire and is located on the western edge of the West Midland conurbation. It therefore offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets. The eastern side of Bridgnorth is tightly constrained by the West Midlands Green Belt. This has greatly limited the options available to the town in the SAMDev Plan. The CS emphasises Bridgnorth’s role as a focal point which contrasts with strongly felt local views of a historic town that should be preserved at its current size. Most of the opportunities in and around Bridgnorth for infill development and small additions to the town have been used up.”*

- 3.18. In Shifnal it was again noted that it is surrounded by Green Belt which has a significant role in protecting the openness of the countryside between Shifnal and Telford. As in Albrighton the Inspector seeks to clarify the role of safeguarded land on the northern and eastern sides of the town which provides a significant buffer between the town and the Green Belt and provides for town’s long-term future development. The Inspector again sought a policy modification to reflect the *“key consideration is that no development should be permitted that would prejudice the future development of the land.*

- 3.19. The SAMDev Plan thus provides settlement policies for Albrighton, Bridgnorth and Shifnal which set out the role of these settlements to reflect Green Belt and safeguarded land issues and requirements.

- 3.20. Explanatory text to Settlement Policy S1 (Albrighton Area) identifies that a limited amount of land to the east of Albrighton was removed from the Green Belt in the previous Bridgnorth Local Plan (2006), to be safeguarded for the village’s future development needs. Part of this safeguarded land at Shaw Lane/Kingswood Road is allocated by the SAMDev Plan in Schedule S1a (Housing) for development at Albrighton during the 2006-2026 Local Plan period. The remainder is safeguarded for the long-term development needs of the village and *“only development which would not prejudice the potential future use of this land to meet Albrighton’s longer term development needs will be acceptable on the safeguarded land during the plan period.”*

- 3.21. Settlement Policy S3 (Bridgnorth Area) focuses on a strategy and allocations directed at non-Green Belt locations, although the role of Stanmore Industrial Estate as an employment site is directly recognised by the policy which identifies it as a protected employment area. There is additionally reference to the need to review Green Belt in explanatory text.
- 3.22. Settlement Policy S15 (Shifnal area) provides for housing and employment allocations, seeks to protect primary retail areas, defines uses within Lamledge Industrial estate, and requires that land beyond the development boundary in the Shifnal area, which is not part of the Green Belt, is safeguarded for Shifnal's future development needs beyond the Plan period. The explanatory text acknowledges that Shifnal is a successful delivery location for new homes, with a significant number of large sites obtaining planning permission in the years prior to the Plan's adoption resulting in a need to support and assimilate this growth and invest in infrastructure. It also identifies that, "*It is important that this scale of residential development is balanced by the provision of employment opportunities*" but that "*Green Belt around Shifnal limits the opportunities for suitable employment sites.*"
- 3.23. In addition to the Core Strategy and SAMDev Plan within the Green Belt there is an adopted Shifnal Neighbourhood Plan (December 2016) and an Albrighton Neighbourhood Plan 'Light'. The latter is a Community-led Plan, which although non-statutory and does not form part of the Development Plan for the area, was adopted by Shropshire Council (September 2013) in recognition of its potential role as a material consideration in planning decisions. It provides detail that, along with the Core Strategy and the SAMDev, informs future development in Albrighton.

### ***Emerging Local Policy - Draft Shropshire Local Plan 2016-2038***

- 3.24. National policy requires that the need for changes to Green Belt boundaries, is established by the strategic policies of a Local Plan, with specific changes of boundaries then achievable by non-strategic policies. This is in line with the proposed role of the Shropshire Local Plan which will provide a strategic and detailed policy context to replace that currently provided by the adopted Core Strategy and SAMDev Plans. This is reflected in the types of draft policies included in the Draft Plan which include: high level strategic approaches; hybrid strategic and implementation policies, including Green Belt policy; more specific development management type policies and Settlement Policies with site allocation proposals and maps that will prescribe detailed Green Belt boundaries.
- 3.25. The Draft Shropshire Local Plan seeks to provide a sustainable pattern of growth, responding to the varying scales, needs and functions of the County's hierarchy of settlements. This recognises the diverse features and characteristics of the County, including the presence of Green Belt and other factors as the Shropshire Hills AONB, the many designated heritage and natural environment assets as well as constraints such as flood risk. It also considers the availability of brownfield land as required by the NPPF, with the Council maintaining the Shropshire Brownfield Land Register Map (2019) for this purpose.
- 3.26. The Draft Shropshire Local Plan reflects a wide and robust range of evidence which underpins many of its draft policies and seeks to respond positively other strategies produced by the Council and other bodies, including: The draft Housing Strategy 2020 to 2025; The draft Climate Change Strategy; the Economic Growth Strategy 2017 to 2021; the emerging Local Transport Plan; and AONB Management Plan.
- 3.27. There follows an overview of the main relevant draft policies which provide the specific justification for Green Belt release through Local Plan review. These are not

necessarily specific to the Green Belt but instead set out the full range of the draft policies that set the broader strategy for the Plan, both within and outside the Green Belt. Together these seek to deliver sustainable development in the Shropshire context applying the urban focus approach for levels and distribution of development. Each of the relevant draft policies is considered below, although it should be noted the Local Plan is designed to be read and implemented as a whole.

### **SP1 The Shropshire Test**

- 3.28. This is described as a ‘gateway’ policy and establishes the starting point for the issues which are considered to be of most importance in enabling growth to occur in a sustainable manner in Shropshire and thus underpins the sustainable growth strategy approach. As such it is repeated in its entirety below:

*“1. Development will contribute to meeting local needs and making its settlements more sustainable, providing the right mix of new housing, employment and other types of development which:*

- a. Supports the health, well-being and safety of communities;*
- b. Supports cohesive communities;*
- c. Addresses the causes and mitigates the impacts of climate change;*
- d. Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;*
- e. Raises design standards and enhances the area’s character and historic environment;*
- f. Makes efficient use of land; and*
- g. Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.*

*2. In addition, and where appropriate, proposals should seek to reflect relevant considerations of Shropshire Council’s other strategies, including its Community Led Plans, Local Economic Growth Strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, and the Public Health Strategy.”*

- 3.29. It is important to note that as identified as a requirement by paragraph 137 of the NPPF (for concluding exceptional circumstances exist) the policy seeks to ensure efficient use of land whilst balancing other sustainability considerations. This is a thread which is reflected in the remaining strategic and development management policies in the Plan and is translated into the guidelines which set the expectations for allocations in the Plan.

### **SP2 Strategic Approach**

- 3.30. This is an important policy which establishes the approach for sustainable development in Shropshire including the scale of development needed on how this should best be distributed. The policy reflects evidence work that has been undertaken by the Council to establish an appropriate and balanced housing and employment requirement (around 30,800 dwellings and 300ha respectively from 2016 to 2038).
- 3.31. The housing numbers identified seek to meet and provide some flexibility to respond to changes to Local Housing Need over the plan period and support the long-term sustainability of the County. The provision is further intended to allow positive response to specific sustainable development opportunities by supporting economic growth and the diversification our labour force and increasing housing to meet the needs of local communities. Reflecting evidence of significant need, the provision of affordable housing is a key priority and the strategic approach provides for the delivery of 7,700 affordable dwellings (around 25% of the total housing



requirement). Policy SP2 also seeks to implement the aspirations of the Economic Growth Strategy for Shropshire and provide a sufficient scale of employment land to deliver enough jobs to achieve a sustainable balance with the housing requirement.

- 3.32. The Policy does seek to promote a sustainable pattern of growth by directing the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support new development and identifies these settlements and their role within a hierarchical approach. The policy states that:

*“Principal and Key Centres will accommodate significant well-designed new housing and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential.”*

*“RAF Cosford Strategic Site will form a centre of excellence for aviation and engineering, meet military personnel accommodation needs and support the aspirations of the Ministry of Defence, the RAF Museum and the Midlands Air Ambulance Charity.”*

*“Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development within Community Hubs, identified in Schedule SP2.2, which are considered significant rural service centres.”*

- 3.33. Within the Green Belt Bridgnorth is identified as a Principal Centre (the highest level of settlement type after Shrewsbury as the County’s main centre), Albrighton and Shifnal are next level settlements, being individual Key Centres and Alveley is a Community Hub. As defined in the policy, RAF Cosford has been identified as a strategic site. These roles are discussed further in relation to the relevant Area policies.
- 3.34. The strategic approach also responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections. Within the Green Belt, the Eastern Belt M54/A5/A41/A464/A5 and A454/A458, strategic corridor, which includes Bridgnorth, Albrighton, Cosford and Shifnal, and links Shropshire with the West Midlands region and the role of the West Midlands Combined Authority is identified.
- 3.35. Whilst the strategy seeks to focus the majority of development outside the rural area, including countryside designated as Green Belt, the explanatory text to the policy clearly identifies that the overall strategic approach seeks to maintain, and enhance where possible, the long-term sustainability of communities, including those in settlements within the Green Belt, as follows:

*“The strategic approach reflects the distinctive, rural nature of Shropshire and the connection between the Strategic Centre of Shrewsbury, the Principal and Key Centres, smaller Community Hub and Community Cluster settlements and the rural areas they serve. It is an approach that seeks to nurture, protect and develop the social and physical fabric of communities, supporting new economic potential within their environmental settings”.*

### **SP3 Climate change**

- 3.36. Reflecting the requirements of the Climate Change Act (2008), sustainable development principles and the requirement set out on NPPF Paragraph 137 regarding optimising development densities the policy supports, *“the principle of*

*delivering higher density development on the most accessible urban sites.*” It also reinforces the desirability of the urban development focus identified within Policy SP2 to minimise travel need and maximise scope to make trips by sustainable modes of transport.

#### **SP4 Sustainable Development**

- 3.37. Reflects the presumption in favour of sustainable development articulated in the NPPF and aims to ensure that decisions in Shropshire are taken in line with this presumption.

#### **SP7 Managing Housing Development**

- 3.38. In addition to making provision for housing on allocated sites, the Plan in this policy recognises the need to capitalise on appropriate *‘additional housing development opportunities which would support the reuse of disused land or premises within settlement development boundaries....; or contribute towards achieving wider town centre regeneration...’*.

#### **SP8 Managing Development in Community Hubs**

- 3.39. Sets out how development will be managed in these settlements, which include Alveley within the Green Belt, in line with their role as significant rural service centres and the focus for development within the rural area.

#### **SP10 Managing Development in the Countryside**

- 3.40. This policy seeks to manage development in the countryside to reflect the Plan’s urban focused development strategy. It recognises the further controls over development that apply to the Green Belt and encourages the use of previously developed land for ‘sustainable employment, tourism, leisure, other business and community development proposals in the countryside, as well as the wider reuse of buildings.

#### **SP11 Green Belt and Safeguarded Land**

- 3.41. Policy SP11, references the Green Belt review, with amendments to the Green Belt being identified to facilitate the strategic approach to the distribution of development within Policy SP2, including the sustainability of settlements, as considered in detail in relation to Policy SP2. The proposed changes are considered to make provision for the long term and, in line with NPPF requirements, it is thus *‘expected that this Green Belt boundary will not need to be altered at the end of the Local Plan period’*.
- 3.42. Policy SP11 through cross reference to the policies map, identifies how the extent of Green Belt and safeguarded land is defined and will function, identifying the specific settlements Albrighton, Bridgnorth, Shifnal and the villages of Alveley, Beckbury, Claverley and Worfield and other sites (RAF Cosford; and the Industrial Estates at Alveley and Stanmore) which are excluded from the Green Belt. Of these locations only RAF Cosford is currently wholly in Green Belt and Policy SP11 identifies it as ‘a strategic site inset within the Green Belt to facilitate military and charity operational and development needs’ and sets the expectation that future additional development at the site will take place within the area inset in the Green Belt unless it is appropriate development or very special circumstances can be demonstrated.
- 3.43. More generally, the policy recognises the special status and purposes of Green Belt and encourages enhancement of Green Belt in line with national policy in NPPF. Thus, the Local Plan, where allocations are proposed in Green Belt locations sets out mitigation measures that can be applied to improve the quality and accessibility of Green Belt and reduce the potential harm where land is taken out from the Green

Belt. It is also expected that when safeguarded land is allocated for development within a future Local Plan, that it will provide compensatory improvements to wider Green Belt. The policy also acts as a development management policy which sets out, alongside NPPF, how Green Belt in Shropshire will be protected against inappropriate development.

- 3.44. It is however recognised by the policy text that the Green Belt within Shropshire was last reviewed during the preparation of the Bridgnorth Local Plan 1996-2011 and that safeguarded land identified to make provision for longer term development needs has now been largely used or allocated. Considering this situation and growth requirements set out by strategic policies in the Plan, together with likely future development needs beyond the Plan period and the commitment made by SAMDev Plan, a review of the Green Belt boundary was undertaken to Local Plan preparation. It is considered (as set out in the Explanatory text to Policy SP11) that the review, 'has formed part of the process of considering the development strategy and options for a sustainable pattern of future growth in the County'. Subsequent to review the Local Plan has identified areas of land for release from the Green Belt at Albrighton, Alveley, Cosford, Shifnal and Stanmore (Bridgnorth).

### **SP12 Shropshire Economic Growth Strategy**

- 3.45. The stated objective of Policy SP12 is to: *"deliver sustainable economic growth and investment in our strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations'....."*
- 3.46. It is an important policy which complements the strategy set out in Policy SP2, supporting the approach to maintaining and achieving sustainable settlements with appropriate infrastructure and services and a balance of housing and accessible employment opportunities. It thus not only underpins the economic element of the exceptional circumstances case being set out, but the whole approach to sustainable development in Shropshire. This connection is specifically made in part 5 of the policy:
- "The delivery of employment will be supported by investment in:*
- a. Housing of the right type, quality, tenure and affordability that will support the move towards increased home/agile working, in the right locations with jobs, services, facilities and leisure to make Shropshire a good place to live, work and play."*
- 3.47. Reflecting the strategy for sustainable development, the Policy sets out an appropriate geography for economic growth that mirrors that adopted for housing and identifies that:
- "Economic growth and investment will be supported in:*
- a. Shrewsbury to develop its role as the County Town and Strategic Centre;*
  - b. The Principal Centres and Key Centres as the key employment and service centres;*
  - c. The 'Strategic Corridors', 'Strategic Settlements' and 'Strategic Sites' identified in the Plan;*
  - d. Community Hubs on saved allocations or windfall development on established employment areas or suitable sites or buildings for small scale employment generating uses; and*
  - e. Community Clusters and the Countryside through windfall development where the location, scale, land use and impacts of the proposals will conform with the existing land uses, settlement form and environmental qualities in accordance with relevant Policies of the Local Plan."*

- 3.48. The policy thus reflects the urban strategic focus and recognises that creating a sustainable pattern of development in Shropshire, a relevant consideration set out in Paragraph 138 of the NPPF, will mean that employment development should be directed to Shrewsbury, our Principal Centres and Key Centres with a portfolio of employment sites identified to provide the range and choice needed to meet the requirements of the development strategies for these settlements. The role of strategic corridors comprising those principal settlements located on transport corridors is also recognised for their importance providing further investment opportunities. The inherent development constraints where these corridors pass through Green Belt is however recognised in the explanation and it is noted that where land is in the Green Belt *“very special circumstances .... will need to be proven to justify further employment development in these locations beyond the sites allocated for this purpose.”*

### **SP13 Delivering Sustainable Economic Growth and Enterprise**

- 3.49. This policy contributes to the economic vision and strategy for Shropshire set out in Policy SP12 and seeks to provide certainty in the delivery of the economic growth strategy by shaping the delivery of the strategic land supply and the use of established employment areas. It expects that the delivery of the planned 300 ha of land for employment development will satisfy the strategic approach set out in Policy SP2 in relation to the settlement hierarchy and the proposed distribution of development within the County.

### **SP14 Strategic Corridors**

- 3.50. Policy SP14 seeks to enable the strategic approach set out in policy SP12 (Shropshire Economic Growth Strategy) by providing a mechanism within strategic corridors for encouraging and responding positively to demand from new and existing business, in locations also supported by housing delivery. The sequential framework in SP14 directly reflects the strategic objective of prioritising significant new development and infrastructure investment into the Strategic, Principal and Key Centres and identified Strategic Sites to create ‘growth zones’ along the ‘strategic corridors’.
- 3.51. There are a number of ‘Strategic corridors’ with principal rail and road connections through Shropshire but those most relevant to Green Belt are:

**Eastern Belt M54/A5, A41/A464 and A4169/A458/A454**, supporting Shropshire’s motorway, road and rail links to the West Midlands region and the role of the West Midlands Combined Authority, including opportunities in and around:

- Shrewsbury as the Strategic Centre and County Town of Shropshire;
- Bridgnorth as a Principal Centre but subject to the Shropshire Green Belt;
- Shifnal, Albrighton, Cosford as Key Centres in the Shropshire Green Belt;
- RAF Cosford as a significant location in the Shropshire Green Belt;
- Ironbridge through the redevelopment of the former Power Station site

**North East Shropshire and the A41 corridor** supporting Shropshire’s links to the Northern Powerhouse through Cheshire and connected to the delivery of HS2 later in the Local Plan period, including opportunities in and around:

- Whitchurch and Market Drayton as Principal Centres;
- Tern Hill through the redevelopment of the Clive Barracks;
- Shifnal, Albrighton, Cosford as Key Centres in the Shropshire Green Belt.

- RAF Cosford as a significant location in the Shropshire Green Belt.

3.52. As well as identifying development location preferences, the sequential approach also recognises the importance of first seeking to utilise brownfield land and sets out the following preference for the release of additional employment land for development in 'strategic corridors', subject to other policy requirements including Green Belt:

*"3. Development on these 'strategic corridors' will be located in accordance with the following sequential preferences:*

*a. In Shrewsbury or the Principal or Key Centres on an allocated site;*

*b. On the identified 'Strategic Sites' in the Local Plan;*

*c. On appropriate windfall development sites which are:*

*i. Located immediately adjoining Shrewsbury or a Principal or Key Centre; and*

*ii. Brownfield sites with direct access to the rail and road routes in the corridor;*

*or*

*iii. Greenfield sites in exceptional circumstances where the:*

- Strategic objectives of national and local policy are fully satisfied and comply with Policy **Error! Reference source not found.**;*

- Proposal will strengthen the role and function of strategic settlements particularly Shrewsbury and the Principal Centres;*

- Proposal is a large and significant investment opportunity that cannot reasonably access sequentially preferable sites;*

- Proposal will:*

- Deliver the greenfield site as a fully serviced and developed employment area,*

- Meet the needs of the proposed 'end user' or occupiers; and*

- Deliver off-site infrastructure investments within the 'strategic corridor'.*

3.53. The need to "make as much use as possible of suitable brownfield sites and underutilised land" (NPPF Paragraph 137) is reflected in the Policy and the Plan which identifies two large brownfield strategic sites at Ironbridge Power Station and Clive Barracks, Tern Hill both of which are within strategic corridors but outside the Green Belt. RAF Cosford which is identified as a strategic site within the Green Belt whilst not brownfield, incorporates an existing major developed area.

3.54. Notwithstanding the identification of brownfield development locations, the corridors are extensive and the value and potential role of the settlements of Bridgnorth, Shifnal and Albrighton (principal and key centres) as locations for delivering employment development to support economic growth is apparent and recognised by policy. The text to Policy SP14 explains:

*"The Strategic, Principal and Key settlements in these 'strategic corridors' are the primary focus for development and infrastructure investment for economic growth. This urban focus will help to create a sustainable pattern of development in the County, support the needs of the majority of Shropshire's communities, significantly reduce the need to travel and to help the County respond positively to the challenges of the Climate Change emergency."*

### **DP8 Gypsy and Traveller Accommodation**

3.55. The policy sets out a preference for development on brownfield sites.



### **DP18 Pollution and Public Amenity.**

- 3.56. The policy encourages re-use of brownfield land and provides a positive context for the consideration of proposals on despoiled, degraded, derelict or unstable land or on land affected by contamination.

### **Settlement, Strategic Settlement and Strategic Site Policies**

- 3.57. The settlement policies in the Plan are grouped into 18 Place Plan areas and translate higher level strategic growth requirements into settlement specific proposals. The relevant Place Plans within the Green Belt are:

**S1. Albrighton Place Plan Area**

**S3. Bridgnorth Place Plan Area (includes Bridgnorth and Alveley)**

**S15. Shifnal Place Plan Area**

- 3.58. As a strategic site RAF Cosford is dealt with separately by strategic site policy:

**S21. Strategic Site: RAF Cosford**

- 3.59. The above policies (S1, S3, S15 & S21) are not considered further in this section as the relevant considerations are discussed in detail under Sections 5-9.

### ***Duty to Cooperate***

- 3.60. Legislation requires Council's preparing Local Plans to undertake a 'duty to cooperate', which makes it a legal requirement for Council's and statutory bodies to work together on strategic cross-boundary issues. Effective and on-going joint working between strategic policy-making authorities is also recognised by the Council as an important part of plan-making.
- 3.61. In Shropshire's case the County is adjoined by the following Local Authorities: Telford and Wrekin, Cheshire West and Chester, Cheshire East, Wrexham, Powys, Herefordshire, Malvern Hills, Wyre Forest, Worcestershire County, South Staffordshire, Stafford Borough, Staffordshire County and Newcastle Under Lyme.
- 3.62. In addition to the adjoining authorities, there are also Local Authorities that do not directly adjoin but have a functional relationship, most notably the Black Country. Positive conversations with relevant bodies have been ongoing over the course of the preparation of the Plan, and ahead of the submission of the Plan for Examination a full set of Statements of Common Ground will be made available. Where these cross-boundary discussions have led to a direct impact upon the Plan this is outlined in the respective policy or explanatory text.
- 3.63. Further to discussions with the Black Country Authorities as part of their ongoing plan making process, Shropshire's housing requirement of 30,800 dwellings incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, where evidence indicates housing delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas. This cross-boundary housing need will be accommodated through the distribution of growth outlined in Policy SP2 and delivered through policies S1-S21 of this Local Plan.
- 3.64. With regard to the review of the Green Belt in Shropshire, Duty to Cooperate discussions have been extensive, this can be summarised as follows:
- A key element of the Green Belt Assessment was stakeholder engagement with the relevant Green Belt Duty to Co-operate partners and more widely with other West Midlands Green Belt local authorities. This included the neighbouring

authorities to Shropshire: Wyre Forest, South Staffordshire, Worcestershire County, Telford and Wrekin, Staffordshire County, and further afield Wolverhampton, Birmingham, Dudley, Walsall and Rugby Councils. Rugby was consulted as the lead contact in previous West Midlands Green Belt work. Consultation with the neighbouring Duty to Co-operate authorities was undertaken specifically on the methodology used for the Green Belt Assessment. Full copies of the responses received and resulting amendments made to the proposed methodology are out in Appendix 2 to the Green Belt assessment study.

- Effective and on-going duty to cooperate discussions regarding the review of Green Belt have occurred within neighbouring Local Authorities.
- Green Belt has also been considered as part of several of the broader 'Regulation 18' Consultations on the Local Plan Review (documented within paragraphs 3.4-3.9 of this Statement). Adjoining and other relevant Local Authorities are included within the Local Plan Consultation database and so notified about Local Plan Consultations and all parties are encouraged to respond to Local Plan Consultations.
- In February 2020, a letter was sent to adjoining Local Authorities regarding potential Green Belt release in Shropshire and asked whether there is available and deliverable land within their area which would be able to functionally serve the geographical location(s) and strategic purposes identified. No Local Authorities responded indicating that they had such opportunities. A copy of this letter which was sent by email to the adjoining Local Authorities is included as Appendix 1 of this Statement.

## 4. Green Belt Release Proposed in Shropshire

- 4.1. The Green Belt in Shropshire was last reviewed during the preparation of the Bridgnorth Local Plan 1996-2011. Consistent with the recommendations of the Planning Inspector during the examination of the SAMDev Plan, the Shropshire Local Plan Review has been informed by a Green Belt Review.
- 4.2. Following extensive consideration and assessment, it is considered that in order to achieve the vision and objectives identified within the Shropshire Local Plan Review, targeted Green Belt release is required. Specifically, release is required to support the short, medium and/or long-term growth requirements and aspirations associated with the following locations in the east of Shropshire: Albrighton, Alveley, Cosford, Shifnal and Stanmore (Bridgnorth).
- 4.3. The extent of the release proposed in each of these locations is summarised within the table below:

Location	Housing (ha)	Mixed Use (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total (ha)
Albrighton	-	-	-	-	19.9	19.9
Alveley	1.4	2.4	-	-	3.6	7.4
RAF Cosford Strategic Site	-	-	-	214.2	-	214.2
Shifnal	-	-	39.0	-	92.8	131.8
Stanmore (Bridgnorth)	-	-	11.4	-	-	11.4
<b>Total</b>	<b>1.4</b>	<b>2.4</b>	<b>50.4</b>	<b>214.2</b>	<b>116.3</b>	<b>384.7</b>

- 4.4. The exceptional circumstances which are considered to exist in association with the release of Green Belt in each of these locations is summarised within this report.



## 5. Albrighton

### ***Introduction***

- 5.1. Albrighton is a large urban village located within the M54 corridor, a key road and rail transport corridor, linking Shropshire to the West Midlands. The settlement lies 7 miles from both Telford to the west and Wolverhampton to the east.
- 5.2. Albrighton is inset within the West Midlands Metropolitan Green Belt. Specifically, it is surrounded by Green Belt, with the exception of an area of land on the eastern edge of the settlement, which was previously removed from the Green Belt and safeguarded for future development and within the ongoing Local Plan Review is now proposed for allocation.
- 5.3. In 2016, Albrighton had an estimated population of 4,870 people and contained 2,205 dwellings. Albrighton generally has an older age structure than the average for Shropshire and England, however interestingly there is also a higher percentage of the population that are of working age (approximately 75% of the population) than the average for Shropshire (approximately 60%), the West Midlands (approximately 62%) and Great Britain (approximately 63%).
- 5.4. Albrighton benefits from an attractive character and setting, as evidenced by the extensive heritage and natural environment assets in and around the settlement.
- 5.5. To the north-west of Albrighton lies Cosford village and RAF base. Whilst Albrighton and Cosford have very distinct and separate identities, due to their proximity there is a strong inter-play between them.
- 5.6. Albrighton currently benefits from an existing Neighbourhood Plan 'Light' (adopted June 2013), a Community Led Plan which was endorsed and adopted for development management purposes by Shropshire Council in September 2013. The document informed and provides policies that supplement those in the existing adopted Local Plan. It has also remained a consideration during the ongoing Local Plan Review.
- 5.7. Albrighton benefits from excellent access to the M54 and A41; has a railway station on the Wolverhampton to Shrewsbury Line; and also benefits from bus services, including to nearby Shifnal, Telford and Wolverhampton.

### ***The Need for Development***

- 5.8. To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, the strategic approach which underpins the emerging Shropshire Local Plan (captured within Policy SP2. Strategic Approach), includes the principle of 'urban focus'.
- 5.9. 'Urban focus' involves directing the majority of new development towards those settlements with the most extensive range of services, facilities and infrastructure to support it. Specifically, settlements identified as Strategic, Principal and Key Centres and the newly identified Strategic Settlements.
- 5.10. Albrighton has been identified as a Key Centre within the Local Plan Review, in recognition of the size of the settlement and the range of services and facilities it offers to its residents and those residing within its extensive rural hinterland.
- 5.11. The strategic approach which underpins the emerging Shropshire Local Plan (again captured within Policy SP2. Strategic Approach) describes Key Centres as follows: *"Principal and Key Centres will accommodate significant well-designed new housing*

*and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential.”*

- 5.12. Reflecting on the role of Albrighton, constraints present and identified issues and opportunities, Policy S1.1 Development Strategy: Albrighton Key Centre, within the emerging Shropshire Local Plan proposes to deliver “*around 500 dwellings and around 5 hectares of employment development.*” It also indicates that “*New housing and employment development will respond to local needs.*”
- 5.13. The nature and scale of development is designed to maintain and enhance Albrighton’s role as a Key Centre and ensure that local housing need is achieved, whilst also respecting the settlement’s location in the Green Belt.
- 5.14. It is also very apparent that over a number of years housing completions in Albrighton have been relatively low, with 66 completions achieved over the current Local Plan period thus far (2006/0702018/19), this equates to around 5 dwellings per annum. There are a number of reasons for this including the fact that the two current residential allocations in the settlement have taken some time to come forward. However, both sites now have the benefit of Planning Permission for parts of the site. Specifically:
- The smaller allocation to the south of Albrighton benefits from Outline/Reserved Matters Planning Permission for Phase 1 of the site.
  - The larger allocation to the east of Albrighton benefits from Outline/Reserved Matters Approval for Phase 1 and Full Planning Permission for Phase 2 of the development.
- 5.15. This provides confidence that delivery of these sites will occur during the early part of the Local Plan Review period. However, it is considered that the level of delivery in the past is likely to have exacerbated local need.

### ***Proposed Green Belt Release***

- 5.16. Having reflected on the strategic role of the settlement, known development constraints, identified issues and opportunities, and having reviewed the site promotions received within the settlement, the draft Local Plan proposes that in Albrighton:
- New residential development will primarily be delivered through the saved existing commitments (including the current Local Plan allocations) and a further residential allocation, consisting of the remaining safeguarded land to the east of the settlement. This development will include appropriate pedestrian, cycle and vehicular links into the existing Local Plan allocation to its west. This will be complemented by any appropriate small-scale windfall residential development within the Albrighton development boundary and appropriate cross-subsidy and exception development.
  - New employment development will primarily be delivered at the nearby RAF Cosford Strategic Site – whilst this site is currently located within the Green Belt, it is proposed that it is removed from the Green Belt as part of the Local Plan Review. The exceptional circumstances identified for the release from Green Belt is summarised in Section 9 of this Statement. This will be complemented by any appropriate small-scale windfall employment development within the Albrighton development boundary shown on the Policies Map, where it is consistent with relevant policies of this Local Plan.

- 5.17. As such it is not proposed that any land is removed from the Green Belt for allocation at Albrighton within the Local Plan Review. However, it is recognised that the proposed allocations within the Local Plan Review will exhaust the supply of safeguarded land that exists around the settlement.
- 5.18. Having considered paragraph 138 of the NPPF which specifies that *“when defining Green Belt boundaries, plans should... be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period”*, and paragraph 139 of the NPPF which states *“When defining Green Belt boundaries, plans should:... c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;...”* it is proposed that land is removed from the Green Belt around the settlement and specifically safeguarded for future development, in order to meet longer-term development needs of Albrighton beyond the Local Plan Review period.
- 5.19. Three areas of safeguarded land are proposed around Albrighton, totalling some 19.9 ha. These are:
- Land at Cross Road, Albrighton (ALB014), which is just under 7 ha in size. This site primarily consists of a series of gently undulating agricultural fields. Site boundaries are defined by Cross Road to the north (beyond which is the built form of the settlement), Newhouse Lane to the east, Patshull Road to the west and hedgerow agricultural field boundaries to the south. The site is considered to be suitable for safeguarding for future development beyond the Local Plan Review period, subject to demonstrating exceptional circumstances for removing the land from the Green Belt. It is also understood to be available for development.
  - Land bounded by Kingswood Road, High House Lane and the By-Pass, Albrighton (part of P35), which is around 6.6 ha in size. This site is triangular in shape and consists of a number of large houses on large plots along Beamish Lane to the north, two irregularly shaped agricultural fields and a wooded area. Site boundaries are defined by Beamish Lane to the north (beyond which is existing safeguarded land, proposed for allocation within the Local Plan Review), the Albrighton By-Pass to the east and Kingswood Road to the west and south. The site is considered to be suitable for safeguarding for future development beyond the Local Plan Review period, subject to demonstrating exceptional circumstances for removing the land from the Green Belt. The availability of the site is currently unknown, however given that it is proposed for safeguarding for future development beyond the Local Plan Review period it is considered that this will change in the future.
  - Land between the By-Pass and Railway Line, Albrighton (P32a), which is around 6.3 ha in size. The site consists of a linear parcel of land bounded by the Albrighton By-Pass to the north and east, the railway line to the south and Albrighton Business Park to the west. The site includes an area of green space, a travellers site consisting of a large area of hardstanding with associated buildings and farm buildings and associated land. Due to the site's location, bounded by the Albrighton By-Pass and Railway Line and separated from the services and facilities available within the settlement by these physical features, it is likely that future use for employment purposes will be considered most appropriate. The site is considered to be suitable for safeguarding for future development beyond the Local Plan Review period, subject to demonstrating exceptional circumstances for removing the land from the Green Belt. The

availability of the site is currently unknown, however given that it is proposed for safeguarding for future development beyond the Local Plan Review period it is considered that this will change in the future.

### **Green Belt Assessment and Review**

- 5.20. To inform the Shropshire Local Plan Review, a two-stage assessment of the Green Belt in Shropshire has been undertaken by specialist and experienced consultants and published by Shropshire Council.
- 5.21. The Green Belt Assessment (Part 1) considers the performance of Green Belt across Shropshire by dividing it into parcels of land and assessing each parcel (providing them a rating of no contribution; weak; moderate or strong) against the five nationally defined purposes that Green Belt serve, these are to:
1. check the unrestricted sprawl of large built-up areas;
  2. prevent neighbouring towns merging into one another;
  3. assist in safeguarding the countryside from encroachment;
  4. preserve the setting and special character of historic towns; and
  5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 5.22. The Green Belt Review (Part 2) is focused on considering the potential harm to the Green Belt resulting from the release of parcels of land, areas of opportunity around identified settlements and strategic geographical locations, if they were identified to provide for development needs and support a sustainable pattern of future growth in the County to 2038 and beyond.
- 5.23. Within the Green Belt Assessment and Review (Part 1 and Part 2), the three areas of land proposed to be safeguarded for future development are considered as part of three Green Belt parcels, these are P32 (which contains P32a), P35 (which contains part of P35) and P36 (which contains ALB014).
- 5.24. The Green Belt Assessment (Part 1) of the performance of these parcels against Green Belt purposes 1a, 1b, 2, 3, & 4 is summarised in the table below.

<b>Parcel Reference</b>	<b>Purpose 1a</b>	<b>Purpose 1b</b>	<b>Purpose 2</b>	<b>Purpose 3</b>	<b>Purpose 4</b>
<b>P32</b>	No contribution	No contribution	Weak	Weak	Moderate
<b>P35</b>	No contribution	No contribution	Weak	Moderate	Strong
<b>P36</b>	No contribution	No contribution	Weak	Moderate	Strong

*Please Note: Purpose 5 is identified as important across all parcels, but the study considers that assessment of performance of individual parcels against this purpose is not possible in a meaningful way.*

- 5.25. This Green Belt Review (Part 2) indicates the harm to the Green Belt resulting from the release of the parcels which contain each of the three areas of land proposed to be safeguarded for future development. Furthermore, within the Green Belt Review (Part 2) in addition to assessing the Green Belt parcels identified, where appropriate sub-parcels were identified within which a lower level of harm to the Green Belt would be experienced if the area were identified for release from the Green Belt. Each of the three areas of land proposed to be safeguarded for future development beyond the Local Plan Review period at Albrighton are within identified sub-parcels.

5.26. The results of these assessments are summarised within the table below:

Parcel Reference	Harm to the Green Belt Resulting from Release of Main Parcel	Harm to the Green Belt Resulting from Release of Relevant Sub-Parcel
<b>P32</b>	Moderate	Low-Moderate
<b>P35</b>	High	Moderate
<b>P36</b>	High	Moderate

5.27. It should be noted that in identifying the sub-parcels, it was determined that their performance against the Green Belt purposes varied from the wider parcen as reported in the earlier table. Specifically, with regard to the sub-parcels of P35 and P36 containing two of the three areas of land proposed to be safeguarded for future development beyond the Local Plan Review period at Albrighton, (ALB014 and part of P35), the Green Belt Review states *“Releasing this parcel from the Green Belt would be unlikely to cause significant encroachment on the countryside, or significantly weaken the role neighbouring areas of Green Belt are playing with regard to Purpose 3 or Purpose 4.”*

5.28. Within the Green Belt Review (Part 2) opportunity areas (Ab-1/Ab-1a and Ab-2/Ab-2a) were assessed that included the areas of land proposed to be safeguarded for future development. This assessment also concluded that there would be low moderate (P32 sub-parcel) and moderate harm (P35 sub-parcel and P36 sub-parcel) to the Green Belt if released.

### **Other Planning Considerations**

5.29. To inform the identification of proposed site allocations and areas of safeguarded land within the Local Plan Review, Shropshire Council has undertaken a comprehensive Site Assessment process. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of the overall vision, strategy and policies, as well as site allocations.

5.30. This Site Assessment process included consideration and identification of potential sites to accommodate development during and beyond the Local Plan Review period at Albrighton. Within this assessment it was concluded that the three areas of land proposed to be released from the Green Belt and safeguarded for future development were suitable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt) and achievable (including viable) subject to their future availability.

5.31. Key considerations within the site assessment process undertaken for Land at Cross Road, Albrighton (ALB014) included:

- The site is well related to the built form of Albrighton.
- Site boundaries are well defined.
- The site is located within flood zone 1. However, there is surface flood risk which will require due consideration.
- The site is located within a source protection zone 3.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site has medium landscape and visual sensitivity to housing development.



- The site benefits from good highway links onto Cross Road.
- The site is likely to have archaeological potential.
- Some site boundaries form environmental network corridors and may contain priority habitats. It is also in proximity of a pond.
- Trees and hedgerows and located within and around the site.
- Surrounding roads may be a source of noise.

5.32. Key considerations within the site assessment process undertaken Land bounded by Kingswood Road, High House Lane and the By-Pass, Albrighton (part of P35) included:

- The site is well related to the built form of Albrighton. Indeed, part of the site contains dwellings associated with Albrighton.
- Site boundaries are well defined.
- The site is located within flood zone 1. However, there is surface flood risk which will require due consideration.
- The site is located within a source protection zone 3.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site has medium landscape and visual sensitivity to housing development.
- The site benefits from good highway links onto Kingswood Road. However, surrounding road infrastructure may require improvement to support future development.
- The wider site contains designated and undesignated heritage assets, however these are considered to be focused outside the area proposed to be removed from the Green Belt and safeguarded for future development.
- The wider site contains ecological assets, however the majority are outside the area proposed to be removed from the Green Belt and safeguarded for future development.
- Trees and hedgerows and located within and around the site.
- Surrounding roads may be a source of noise, particularly the A41.

5.33. Key considerations within the site assessment process undertaken Land between the By-Pass and Railway Line, Albrighton (P32a), included:

- The site is well related to the built form of Albrighton.
- Site boundaries are well-defined, however they do cause some separation from the built form of the settlement and the services and facilities available within it.
- The site is located within flood zone 1. However, there is surface flood risk to a very small area which will require due consideration.
- The site is located within a source protection zone 3.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site has medium landscape and visual sensitivity to housing development.

- The site benefits from good highway links.
- The wider site contains designated and undesignated heritage assets, however these are considered to be focused outside the area proposed to be removed from the Green Belt and safeguarded for future development.
- The site may contain priority habitats and its southern boundary forms part of an environmental network.
- Mature hedgerows within and around the site and trees on its southern boundary.
- The A41 and Railway are potential sources of noise.
- Due to the site's location, bounded by the Albrighton By-Pass and Railway Line and separated from the services and facilities available within the settlement by these physical features, it is likely that future use for employment purposes will be considered most appropriate.

### **Assessment of All Other Reasonable Options**

5.34. Paragraph 137 of the NPPF states:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.*

5.35. Within Albrighton, a comprehensive assessment of alternative options has been undertaken, through the site assessment process to inform the Local Plan Review. This process identified a site outside the Green Belt (this is the existing safeguarded land associated with the settlement) which has been proposed as a residential allocation within the Local Plan Review.

5.36. The site assessment process also identified two smaller sites (one of which is brownfield) located within the settlement development boundary and as such not within the Green Belt, which may well represent windfall opportunities for residential development during the Local Plan Review period, subject to compliance with the policies of the emerging Local Plan. No other suitable brownfield sites or underutilised land was identified to meet the longer-term needs of the settlement beyond the Local Plan Review period. Furthermore, no other greenfield sites that are not located within the Green Belt were identified.

5.37. Whilst further development opportunities could of course arise during the Local Plan Review period, other than the aforementioned windfall opportunities, it is not considered that there are any obvious locations where this is likely to occur. It is

very apparent that over the years, the presence of Green Belt around the settlement has had the desired effect of maximising the potential of any redevelopment opportunities within the settlement.

- 5.38. Maximising site density has been a consideration with regard to existing and proposed allocations at Albrighton. However, it is important that any development reflects the character of the associated settlement and meets the needs of the community. As such it is considered that guidelines and approximate site provision figures for existing and proposed allocations appropriately maximise site density. Indeed, they ensure that no Green Belt release is required for development during the Local Plan Review period. However, it is not considered that density can be further maximised to 'stretch' the supply of sites beyond the Local Plan Review period.
- 5.39. As such, it has become apparent through the site assessment process that there are very limited options in and around Albrighton for development to meet the needs of the community in Albrighton in the longer term beyond the Local Plan Review period, given the limited windfall opportunities and that the proposed allocations exhaust the remaining safeguarded land associated with the settlement.
- 5.40. Another alternative option considered was siting future development in locations other than in and around Albrighton itself. However, Albrighton has been identified as a Key Centre within the current Local Plan and within the Local Plan Review. It is also considered a very sustainable settlement, located on a strategic transport corridor and benefitting from high quality road and rail transport links. If it is to continue to effectively perform its role as a Key Centre; ensure the long-term sustainability of its services and facilities; and meet the economic, social and environmental needs of its community and those within its extensive hinterland in the future, then there is a need to ensure there are future development opportunities associated with the settlement.
- 5.41. Furthermore, it is not considered that this approach would allow for the future housing needs of the community of Albrighton to be met. Ultimately it is not considered that the provision of housing in other locations will meet local need.
- 5.42. This is particularly apparent at Albrighton, which is located some distance from a significant settlement that is not located in the Green Belt – in a Shropshire context, the nearest such settlement is Broseley (around 7.5 miles away), followed by Bridgnorth (around 8 miles away) and Much Wenlock (around 11 miles away), although in reality there are more limited functional links between these settlements. Telford and Codsall are of course closer but are located within adjoining Local Authorities. Development in these locations would not therefore serve the local needs of Albrighton.
- 5.43. Shropshire Council has also approached neighbouring authorities to ascertain whether they are able to meet any of the longer-term development need associated with Albrighton. No positive replies have been received, but since the requirement for Green Belt release is location specific to support the long-term sustainable function of Albrighton this is perhaps unsurprising.
- 5.44. Ultimately it is not considered that restricting the potential for new development to occur in Albrighton beyond the Local Plan Review period would represent a sustainable pattern of development, as it would not allow for future local needs to be effectively achieved, would not support the continued function of Albrighton as a Key Centre (and one which benefits from high quality road and rail transport links) and could potentially undermine the long term sustainability of services and facilities available in the settlement and potentially of the settlement itself.



- 5.45. Paragraph 138 of the NPPF states that *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*
- 5.46. Additionally, paragraph 139 of the NPPF states *““When defining Green Belt boundaries, plans should:… c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;…”*
- 5.47. In order to ensure that the longer-term needs of the communities living in Albrighton and its surrounding rural hinterland can be achieved, it is considered necessary to identify safeguarded land for development beyond the Local Plan Review period.

### **Exceptional Circumstances**

- 5.48. Paragraph 136 of the NPPF states:

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans”.*

- 5.49. Further, Paragraphs 138 of the NPPF states:

*“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.*

- 5.50. It is considered that there are a number of exceptional circumstances which support the proposed release of three areas of land from the Green Belt to be safeguarded for future development beyond the Local Plan review period, this includes:

### **Supporting the Role and Function of Albrighton in the Future**

- 5.51. Albrighton has been identified as a Key Centre within the current Local Plan and within the Local Plan Review as a result of its size and the range of services and facilities available to the community of the settlement and within its rural hinterland.

It is also considered a very sustainable settlement, located on a strategic transport corridor and benefitting from high quality road and rail transport links. If it is to continue to effectively perform its role as a Key Centre; ensure the long-term sustainability of its services and facilities; and meet the economic, social and environmental needs of its community and those within its extensive hinterland in the future, then there is a need to ensure there are future development opportunities associated with the settlement.

- 5.52. It is considered that without providing further safeguarded land associated with the settlement of Albrighton, there will be very limited future development opportunities. As such it is considered that this represents an exceptional circumstance to justify releasing the land from the Green Belt.

### **Meeting Local Needs in the Future**

- 5.53. Very much linked to the above point, is ensuring the ability to meet the future housing needs of the local community. In order to effectively achieve this, there is a need to ensure that there are future development opportunities associated with the settlement. Ultimately it is not considered that the provision of housing in other locations will meet this local need.
- 5.54. This is particularly apparent at Albrighton, which is located some distance from a significant settlement that is not located in the Green Belt. In a Shropshire context, the nearest such settlement is Broseley (around 7.5 miles away), followed by Bridgnorth (around 8 miles away) and Much Wenlock (around 11 miles away), although in reality there are more limited functional links between these settlements. Telford and Codsall are of course closer but are located within adjoining Local Authorities. Development in these locations would not therefore serve the local needs of Albrighton.
- 5.55. Paragraph 139 of the NPPF states *“When defining Green Belt boundaries, plans should:... c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;...”*
- 5.56. In order to ensure that the longer-term needs of the communities living in Albrighton and its surrounding rural hinterland can be achieved, it is considered necessary to identify safeguarded land for development beyond the Local Plan Review period. As such it is considered that this represents an exceptional circumstance to justify releasing the land from the Green Belt.

### **Sustainable Patterns of Development**

- 5.57. Paragraph 138 of the NPPF states that *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*

- 5.58. Ultimately it is not considered that restricting the potential for new development to occur in Albrighton beyond the Local Plan Review period would represent a sustainable pattern of development, as it would not allow for future local needs to be effectively achieved, would not support the continued function of Albrighton as a Key Centre (and one which benefits from high quality road and rail transport links) and could potentially undermine the long term sustainability of services and facilities available in the settlement and potentially of the settlement itself.
- 5.59. In order to ensure that sustainable patterns of development can occur in the future, it is considered that there is a need to remove land from the Green Belt at Albrighton and safeguard it for future development beyond the Local Plan Review period, to allow for future development opportunities in the settlement. The land proposed to be removed from the Green Belt and safeguarded for future development beyond the current Local Plan Review period are well-located to access the public transport links serving Albrighton.

### **Green Belt Performance**

- 5.60. In identifying appropriate locations to proposed for safeguarding for future development beyond the Local Plan Review period, the performance of land against Green Belt purposes and the harm to the Green Belt which would result from release was an important consideration, alongside the wider factors included within the site assessment process which has informed the Local Plan Review.
- 5.61. As summarised within the Albrighton: Green Belt Assessment and Review section of this statement, the Green Belt proposed for release at Albrighton to be safeguarded for development beyond the Local Plan Review period would result in at most moderate harm to the Green Belt.
- 5.62. Furthermore, whilst the wider Green Belt parcels containing sites (ALB014 and part of P35) perform strongly against Purpose 4, the Green Belt Review concluded that sub-parcels containing these sites performed differently, stating *“Releasing this parcel from the Green Belt would be unlikely to cause significant encroachment on the countryside, or significantly weaken the role neighbouring areas of Green Belt are playing with regard to Purpose 3 or Purpose 4.”*
- 5.63. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.

### **Site Boundaries**

- 5.64. Paragraph 139 of the NPPF states:

*“When defining Green Belt boundaries, plans should:*

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*

*f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

- 5.65. The Green Belt release proposed at Albrighton is specifically for safeguarded land to meet the longer-term development needs of the settlement beyond the Local Plan Review period. This is supporting of the current and potential future Local Plans for Shropshire, as it will allow for a sustainable pattern of development associated with both the settlement and with regard to the distribution of development across Shropshire.
- 5.66. The extent of the three areas of land proposed to be released from the Green Belt and safeguarded for future development beyond the Local Plan Review period align as best as practicable with strong defensible Green Belt boundaries. Specifically, identified boundaries are clearly formed by various physical features. Addressing each parcel in turn:
- Boundaries for land at Cross Road, Albrighton (ALB014) are formed by:
    - Cross Lane (and the built form of Albrighton beyond) to the north;
    - Newhouse Lane to the east;
    - Patshull Road to the west; and
    - Hedgerow agricultural field boundaries to the south.
  - Boundaries for land bounded by Kingswood Road, High House Lane and the By-Pass, Albrighton are formed by:
    - Beamish Lane to the north (beyond which is existing safeguarded land, proposed for allocation within the Local Plan Review);
    - The Albrighton By-Pass to the east; and
    - Kingswood Road to the west and south.
  - Boundaries for land between the By-Pass and Railway Line, Albrighton (P32a) are formed by:
    - The Albrighton By-Pass to the north and east;
    - The railway line to the south; and
    - Albrighton Business Park to the west.

### ***Compensatory Improvements to the Green Belt***

- 5.67. The NPPF states that *“Where it has been concluded that it is necessary to release Green Belt land for development... They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”*.
- 5.68. The land proposed for release from the Green Belt is for safeguarding for development beyond the Local Plan Review period. As such it is more challenging to achieve compensatory improvements to the Green Belt in the Local Plan Review period, as the sites themselves will not be subject to development in this period. As such it is proposed that, if and when these areas of land are eventually allocated for development through a future Local Plan Review, that direct compensatory improvements to the Green Belt are achieved at that time.
- 5.69. During the Local Plan Review period, compensatory improvements to the Green Belt will be achieved in association with sites specifically removed from the Green

Belt for development in other locations. Furthermore, the proposed allocation in Albrighton (which consists of the remaining safeguarded land) will itself positively contribute to the remaining Green Belt through green infrastructure provision through the site and linking into the wider area, particularly along the railway line and the associated green infrastructure corridor.

## 6. Alveley

### *Introduction*

- 6.1. Alveley is a large village wholly within the southern area of the Shropshire Green Belt. It lies around 7 miles to the South east of Bridgnorth, off the A442 Bridgnorth to Kidderminster Road. The historic core of the village developed along a prominent ridge overlooking the Severn valley and there are a number of attractive sandstone and timber framed buildings and a medieval church within this area. However, it was during the 1960s that the village began to grow, with more significant expansion in the 1970s, including development around Daddlebrook Road and at Arden Way. Much of the development that has occurred in the village over the last 20 years has been limited to small scale infilling development and in 2016, the village had an estimated population of 1,583 people and contained 718 dwellings.
- 6.2. There is quarrying and mining heritage just to the west of Alveley village, in the Severn Valley associated with sandstone quarrying and the Highley/Alveley colliery. The two settlements, Alveley and Highley, are linked across the River Severn only by the pedestrian Miners Bridge. A small industrial estate (Alveley Industrial Estate which is inset in the Green Belt) was developed at the site of the former pithead buildings sometime after the closure of the mine in the late 1960s. A project to create a Country Park was instigated in 1986 to reclaim the area left despoiled and derelict by mining activity which led to the opening of the Severn Valley Country Park in 1992.

### *The Need for Development*

- 6.3. Alveley is a Community Hub which lies within the Bridgnorth Place area. The village was identified as a Community Hub through the Plan's settlement hierarchy assessment process (the details of which form part of the evidence base for the Plan). In broad terms, 'Community Hubs' are sustainable rural settlements which provide a combination of services and facilities; public transport links; significant employment opportunities; and high-speed broadband, generally considered sufficient to meet the day-to-day needs of their resident communities. Alveley is considered to meet these requirements and is relatively highly performing in the settlement hierarchy assessment process, reflecting access within the village to a number of services and facilities.
- 6.4. The importance of ensuring the long-term sustainability of rural communities, of which supporting village vitality and addressing infrastructure and development needs is part, is recognised by strategic policy SP2 and there is an expectation that growth in urban areas will be complemented by appropriate new development within Community Hubs, such as Alveley.
- 6.5. Historically residential development levels in Alveley from 2006/07 (when Bridgnorth Local Plan was adopted) to 31st March 2019 have been modest with 28 dwellings recorded as complete over the 13 year period. It is also notable that over a number of years spanning from 2006/07 – 2009/10 and from 2012/13- 2015/16, there were no new dwellings completed in Alveley. This is reflective of the village's previous status for development purposes, as part of the countryside, and a lack of specific allocations for residential development.
- 6.6. A brownfield site has come forward at a former garage site and there has been delivery of some affordable housing, but the existing built area of the village now has limited remaining infill opportunities and no land currently safeguarded for future development. Future development is therefore likely to depend on



appropriate affordable and conversion schemes coming forward and on brownfield development in this rural location with no significant amounts of previously used land or buildings in locations accessible to village services and facilities, other than the promoted Alveley Sports and Social Club house buildings on Daddlebrook Road which remains in active use.

- 6.7. Census data (2011) indicated that a high proportion of the population live in owner occupied accommodation (81% versus Shropshire average 69.2%) with a predominance of detached and semi-detached houses or bungalows and lack of terraced dwellings or flats. In terms of community sustainability of significant import is unmet provision for local housing need which includes affordable housing provision and the provision of accommodation types which are not available in the village. This is evidenced by a 2017 Local Housing Need Survey and identified in the Place Plan as a need for a range of affordable housing types to make local housing available to people who are currently excluded in particular young adults and older people wishing to downsize. Types of accommodation identified in the Place Plan as needed are smaller bungalows, affordable 3- bedroom family homes, 2-bedroom starter homes (rent / shared ownership / for sale) and 'warden-aided' accommodation.
- 6.8. Whilst Alveley has sports and leisure provision, the Place Plan does identify potential additions and improvements to existing leisure facilities and activities to target the specific needs of different groups e.g. young adults, the elderly so that as many residents as possible have access to appropriate and attractive leisure opportunities within the area. The site that has been promoted at Daddlebrook Road (ALV006 /ALV007) could help deliver improved facilities.

### ***Proposed Green Belt Release***

- 6.9. Having considered the role of the village as a Community Hub, known development constraints, identified issues and opportunities, and having reviewed the site promotions received the draft Local Plan proposes the following Green Belt release in Alveley:
- Mixed use allocation with provision for community sports and recreation facilities and around 35 dwellings, at Land north of Daddlebrook Road and West of A442 (ALV006/ALV007);
  - Residential allocation with provision for around 35 dwellings, on Land Adjacent to The Cleckars, Alveley (ALV009); and
  - Safeguarded land, off Cooks Cross (ALV002/P70), be provided to provide for longer term needs in accordance with Paragraph 138 of the NPPF.
- 6.10. The Green Belt releases proposed at Alveley are for two separate allocations to the north (ALV006/ALV007) and south (ALV009) of the village and for safeguarded land linked by the proposed northern allocation to provide for development needs beyond the Local Plan Review period.
- 6.11. The proposal is for release for an allocation of 1.4 ha solely for housing and a 2.4 ha mixed use incorporating sports and recreational uses and housing. Safeguarded land to provide a long-term location for growth is 3.6ha, amounting to a total proposed Green Belt release of 7.4ha in Alveley. These proposals reflect the consideration of existing requirements and the taking of a long-term view to potential development needs in line with national guidance which seeks to avoid undermining the permanence of Green Belt boundaries.

## **Green Belt Assessment and Review**

- 6.12. To inform the Shropshire Local Plan Review, a two-stage assessment of the Green Belt in Shropshire has been undertaken by specialist consultants and published by Shropshire Council.
- 6.13. The Green Belt Assessment (Part 1) considers the performance of Green Belt across Shropshire by dividing it into parcels of land and assessing each parcel (providing them a rating of no contribution; weak; moderate or strong) against the five nationally defined purposes that Green Belt serve, these are to:
1. check the unrestricted sprawl of large built-up areas;
  2. prevent neighbouring towns merging into one another;
  3. assist in safeguarding the countryside from encroachment;
  4. preserve the setting and special character of historic towns; and
  5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.14. The Green Belt Review (Part 2) is focused on considering the potential harm to the Green Belt resulting from the release of parcels of land and areas of opportunity around identified settlements and strategic geographical locations, if they were identified to provide for development needs and support a sustainable pattern of future growth in the County to 2038 and beyond.
- 6.15. Within the Green Belt Assessment and Review (Part 1 and Part 2). The identified sites for release in Alveley fall within the following parcels within the study:
- **P70** Safeguarded Land, Off Cooks Cross (ALV002);
  - **P70 sub-parcel** Land north of Daddlebrook Road and west of A442, Alveley (ALV006 & ALV007); and
  - **P72** Land Adjacent to The Cleckars, Alveley (ALV009)- ALV009.
- 6.16. Parcel P70 is described as separated from the wider countryside by minor roads to the north and west and by the A442 to the east and largely contained by the surrounding development and landform. It is also noted that it 'encompasses urbanising features and so is considered to have a stronger association with the settlement edge than with the wider countryside'. The study also identifies a sub-parcel within Parcel P70, equating to proposed allocation ALV006 & ALV007, which would have a lower level of harm associated with its release. It concludes that releasing sub-parcel P70 from the Green Belt would lead to a Low level of harm to the Green Belt designation in this local area.
- 6.17. Parcel P72 is described as comprising a small low-lying area of partly developed land bound by the A442 to the east and a small cluster of development and a line of trees to the south which are considered to provide a high level of visual containment and separate the parcel from the wider countryside to the east and south. Like P70 parcel P72 is not considered to be strongly connected to the open countryside surrounding Alveley. The settlement edge of Alveley which borders the north is noted as visually prominent and the parcel is considered to have a closer association with the settlement than the wider countryside. The study also identifies a sub-parcel within Parcel P72, largely consistent with the proposed allocation ALV009, which would have a lower level of harm - Low-Moderate to the Green Belt designation in this local area associated with its release.



6.18. The Green Belt Assessment (Part 1) of the performance of these parcels against Green Belt purposes 1a, 1b, 2, 3, & 4 is summarised in the table below.

Parcel Reference	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
<b>P70</b>	No contribution	No contribution	Weak	Moderate	No contribution
<b>P72</b>	No contribution	No contribution	Weak	Moderate	No contribution

6.19. This Green Belt Review (Part 2) indicates the harm to the Green Belt resulting from the release of the parcels for allocation and safeguarding can be summarised as follows:

Parcel Reference	Harm to the Green Belt Resulting from Release
<b>P70</b>	Low-Moderate Harm
<b>P70 sub parcel</b>	Low Harm
<b>P72</b>	Moderate Harm
<b>P72 sub parcel</b>	Low-Moderate Harm

6.20. In considering harm of release of the whole of P70 it is significant that this parcel contains existing development, is partly enclosed by settlement and has a relatively weak connection to the wider countryside to the north and east. It is identified that the A442 and smaller roads of Cooks Cross and Daddlebrook Road could also form an alternative Green Belt boundary that is slightly stronger than the existing Green Belt boundary. Whilst release may lead to some encroachment on neighbouring parcels it is felt that it would not significantly weaken the role that these neighbouring areas of land are playing as Green Belt due to its relative containment by existing development.

6.21. The sub-parcel which has been identified within Parcel P70 that would lead to a lower level of overall harm to the Green Belt if it was to be released comprises the southern extent of parcel P70 adjoining the settlement. This area is assessed as having strong characteristics of the urban fringe as it is contained by built development on three sides, including the A road running along the eastern boundary. Also, the land is described as low lying without a strong connection to the wider countryside to the east of Alveley and separated to the north by boundary features. It is concluded that the release of the sub-parcel from the Green Belt would not lead to either a sense of encroachment within neighbouring areas of land or weaken the overall role neighbouring land is playing as Green Belt.

6.22. In considering harm of release of sub parcel P72 it is highlighted that it is strongly contained by mature trees, a residential garden, tree planting and the settlement edge of Alveley. In drawing conclusions regarding harm of release the sub parcel is assessed as not forming part of the wider countryside and being heavily influenced by the adjoining settlement edge.

### ***Other Planning Considerations***

6.23. To inform the identification of proposed site allocations and areas of safeguarded land within the Local Plan Review, Shropshire Council has undertaken a comprehensive Site Assessment process. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of the overall vision, strategy and policies, as well as site allocations.

- 6.24. This Site Assessment process included consideration and identification of potential sites to accommodate development during and beyond the Local Plan Review period at Alveley. Within this assessment it was concluded that the three areas of land proposed to be released from the Green Belt were suitable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt) for allocation or safeguarding for future development.
- 6.25. Key considerations within the site assessment process undertaken for Land at Daddlebrook Road, Alveley (ALV006/ALV007) included:
- The site is well related to the built form of Alveley.
  - The site provides an opportunity for enhanced sports/recreational facilities.
  - The site provides scope to integrate existing nearby development into the village and enhance village gateway.
  - The site is located within flood zone 1. However, there is surface flood risk which will require due consideration.
  - No known significant physical site constraints.
  - There is no safeguarded land available at Alveley and the site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
  - The site has medium landscape and visual sensitivity to housing development.
  - The site benefits from good access onto Daddlebrook Road and from there to the A442. With scope for pedestrian crossing facility across Daddlebrook Road.
  - There are no significant heritage considerations.
  - Trees and hedgerows are located within and around the site. Buffering of boundaries and detailed consideration of trees & hedgerows & ecological interest will be necessary.
  - Surrounding roads may be a source of noise.
- 6.26. Key considerations within the site assessment process undertaken for Land Adjacent to the Cleckars, Alveley (ALV009) included:
- The site is well related to Alveley.
  - A public right of way crosses the site.
  - The site is located within flood zone 1. However, proximity to a watercourse will require consideration.
  - The site is subject to some environmental constraints, including mature trees and hedgerows, particularly to boundaries. Therefore, detailed consideration of trees, hedgerows and ecological interest would be necessary in relation to development proposals.
  - No known significant physical site constraints.
  - There is no safeguarded land available at Alveley and the site is located within the Green Belt: the site forms part of a Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).

- The site has medium/low landscape and visual sensitivity to housing development.
- The site benefits from access onto the A442 with speed limit extension/traffic calming measures.
- There are no significant heritage considerations.
- Adjoining road may be a source of noise.

6.27. Key considerations within the site assessment process undertaken for P70 Safeguarded Land, Off Cooks Cross (ALV002) included:

- The land does not currently have a strong relationship with the built form of Alveley but the site adjoins and has potential point of access from ALV006/ALV007.
- Potential for access from the North or from ALV006/007
- A public right of way crosses the site
- Adjoining warehouse may be a source of noise.
- The site is located within flood zone 1. However, there is surface flood risk and proximity to a watercourse which will require due consideration.
- There is no safeguarded land available at Alveley and the site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site has medium landscape and visual sensitivity to housing development.
- A heritage assessment would be required.
- The site is subject to some environmental constraints, including mature trees and hedgerows, particularly to boundaries and ecology. Therefore, detailed consideration of trees, hedgerows and ecological interest would be necessary.

### ***Assessment of Other Reasonable Options***

- 6.28. Brownfield options have been considered but there are no known available previously used land or buildings accessible other than the Alveley Sports and Social Club house buildings on Daddlebrook Road. Whilst the existing Alveley sports and social association club house site, which is outside the Green Belt, is promoted it is still in use as a community facility. Infill redevelopment would require an assessment of the impact of the loss of the facility and consideration of any replacement which is proposed. Alternative provision on a new site to allow redevelopment is likely to also require the release of Green Belt land, including the site (ALV006 /ALV007) that has been proposed for this purpose and which incorporates housing to help fund the development.
- 6.29. The available and deliverable sites considered as part of the Plan's site assessment are largely greenfield and Green Belt. The only significant undeveloped areas within the settlement are the existing sports and recreational areas, school fields and play areas which have not been promoted as sites. Additionally, whilst these lie within the area already inset in the Green Belt, loss of these would not support the principles of maintaining the range of accessible, recreational and sporting facilities which contribute to the settlement's social sustainability. As the built-up edge of the village is tightly constrained by the Green Belt all other suitable alternative options, excluding small infill, are therefore likely to be in the Green Belt.

- 6.30. The rationale for the proposed releases of Green Belt land is that they are required to directly meet Alveley's needs, as discussed above, and to support its continuing role as a Community Hub. It is an established community that provides a service centre within a Green Belt location that lies between the larger settlements of Bridgnorth and Kidderminster (outside Shropshire) which provide the higher-level services and facilities. The Plan strategy has focused development in principal and key centres but the closest of these is Bridgnorth (also subject to Green Belt constraint) some 7 miles away or Highley to the west across the River Severn. Whilst Highley is geographically closer, there is no vehicular access across the river to Alveley from Highley and the communities do not have functional links. Development in these locations would not therefore serve the local needs of Alveley.
- 6.31. Shropshire Council has approached neighbouring authorities to ascertain whether they are able to meet any of the development need that has been identified. No positive replies have been received but since the requirement for Green Belt release is location specific to support the long-term sustainable function of Alveley it is considered that there are no sufficiently close non-Green Belt locations that would achieve this.

### ***Identification of Green Belt Locations***

- 6.32. The site assessment process, which involves the consideration of other factors such as landscape and ecological quality, historic environment, access suitability, physical constraints and flood risk carried out for the Plan considers the suitability of potential sites surrounding Alveley settlement all of which are Green Belt. This is supported by Green Belt Review study evidence which provides evidence of potential areas of lower impact on the Green Belt if released. Whilst lower harm of release is a helpful factor, it is not the sole reason for identifying suitable locations for release which is the result of the consideration of the full range of issues which need to be taken into account when selecting sites.
- 6.33. Other general considerations when selecting sites for release has been landscape sensitivity of the Severn Valley to the west and the physical barrier and limit to the village edge provided by the A442 which also provides clear Green Belt boundary definition. Additionally, there are heritage impact considerations associated with sites close to the historic core of the village and associated Conservation Area. Some sites also have significant access constraints.
- 6.34. The site off Daddlebrook Road has been identified as forming part of a sub- parcel which is assessed as a less sensitive (low harm) area for Green Belt release and in landscape terms. It lies to the west of the A442 and is well located relative to the village services and facilities. It also presents an opportunity to effect improvements to existing leisure facilities and enhance the village gateway location. A high-quality layout and design recognising the Green Belt edge of the site would be expected and could successfully integrate development into the village. There is limited and manageable surface water flood risk. Protection of trees and boundaries will be required and could be combined with landscaping to mitigate visual impact and reinforce new Green Belt boundaries. As indicated the A442 to the east of the site does form a good boundary. Any site layout will however need to consider and provide for future access to the adjoining area which is identified as a safeguarded land so that future development opportunity is not restricted.
- 6.35. Identified safeguarded land (ALV002) is similarly to the west of the A442 and links well to the Daddlebrook Road site and northern village edge. The site is accessible but subject to some heritage and environmental constraints, adjoining an

environmental network, which would need to be fully considered, together with appropriate boundary definition, if brought forward for allocation in the future. It is also considered as potentially being a less sensitive area (low -moderate harm) for Green Belt release being assessed.

- 6.36. Land adjacent to The Cleckars, Daddlebrook Road has been identified as mainly forming part of a sub-parcel which is assessed as a less sensitive area for Green Belt release and in landscape terms. It lies to the west of the A442 and is well located relative to the village services and facilities with manageable constraints and opportunities for enhancing pedestrian linkage. It has thus been identified as a location to provide needed residential development subject to development safeguarding and enhancing ecological interest, access, tree cover and boundaries.

### ***Compensatory Improvements to the Green Belt***

- 6.37. The site guidelines to the allocation at The Cleckars identify opportunities to enhance footpath links across from the site to the existing rights of way network in Green Belt beyond the site. Traffic calming at the site frontage and provision of a footway will also improve pedestrian access. It is expected that the design and layout of development should retain mature trees and hedgerows, safeguard ecological interest, including adjacent priority habitat, and provide additional planting to improve biodiversity and minimise and mitigate visual encroachment into Green Belt.
- 6.38. The site guidelines to the allocation at Daddlebrook Road require retention of mature trees and hedgerows, enhanced planting where possible, particularly at the northern and eastern boundaries with planting to contribute to the quality of the local environment, minimise visual encroachment, contribute to mitigation, including improving biodiversity, and reinforcement of Green Belt boundaries.
- 6.39. The Place Plan identifies scope to improve the wider cycle and pedestrian network with the aim of developing bridleways into a 'trail network' shared by cyclists and walkers as well as horse-riders and improving footpaths to allow 'level access' by replacing stiles with kissing gates. This would increase safe access of facilities and promote wider use of Green Belt.
- 6.40. Linked to the public rights of way network, the Severn Valley Country Park which offers 126 acres of accessible countryside provides an exceptional existing facility within the Green Belt within close vicinity to Alveley village. It provides an array of facilities to enable enjoyment of the countryside by everyone, including: guided and self-led walks, including wheelchair and pushchair accessible trails, cycle paths and bridleways; a programme of activities; visitor centre and purpose-built classroom; café and picnic areas; play areas and carparking. The Place Plan however recognises the need for Local highway improvements and specifically identifies provision of passing places on access road to Severn Valley Country Park to further improve safe access to the facility. Liaison with Shropshire Outdoor Partnership who manage the Park could also identify other requirements for improvements.
- 6.41. The Place Plan also identifies a Parish wide aspiration to improve the cycle and pedestrian network with the aim of developing bridleways into a 'trail network' shared by cyclists and walkers as well as horse-riders, which would promote health and safety, and encourage cycling to school, and improving footpaths to allow 'level access' by replacing stiles with kissing gates.
- 6.42. A further initiative identified within the Place Plan which could be supported as compensatory improvements is the proposal to develop biodiversity throughout the Parish Council area by managing 'green spaces' more imaginatively, including

experimenting with different and/or flexible mowing regimes to encourage seasonal wild flowers and potentially the development of road-side nature reserves. It is intended that projects would be based on wide consultation across the community and would encourage community involvement.

## **Conclusion**

6.43. Without Green Belt release achieving development to fulfil housing need and support the retention of local services and facilities will result in a reliance on limited infill opportunities and appropriate affordable and conversion schemes coming forward. Considering previous delivery and the nature of the settlement, these options are unlikely to deliver sufficient housing to fulfil Alveley's needs and support its long-term sustainability. Green Belt release is considered to be required to allow specific site allocations with sufficient safeguarded land to plan for future development needs beyond the Local Plan Review period. The sites that have been identified: are of appropriate scale; well located in relation to the village and its services and facilities; lack significant constraints; are areas of lower harm of Green Belt release with sensible boundaries; can provide Green Belt mitigation measures; and present opportunities for the provision of new facilities and improvements to the village gateway. The identification of Green Belt release in different parts of the village also provides alternative delivery options.



## 7. Bridgnorth (Stanmore)

### *Introduction*

- 7.1. Bridgnorth is an attractive historic market town located in the east of Shropshire at the junction of the A458 and A442. The town straddles the River Severn and comprises a Low Town to the east and High Town to the west, perched on cliffs 100ft above.
- 7.2. Bridgnorth has an unusual relationship to the West Midlands Green Belt in that the town is not fully inset within the Green Belt, rather it wraps around Low Town, defining the town's eastern development boundary. However, Stanmore Industrial Estate, a significant employment site associated with the town, lies to the east of the Low Town, inset within the Green Belt.

### *Background - Bridgnorth*

- 7.3. In 2016, the start of the Local Plan Review period, Bridgnorth had:
  - A population of around 13,000 and contained around 6,200 dwellings, making it the third largest populated town in Shropshire, after Shrewsbury in the centre of Shropshire, with a population of around 75,000 and around 34,600 dwellings and Oswestry in the north-west of Shropshire, with a population of around 19,000 and around 8,800 dwellings.
  - A higher age profile than that for Shropshire and England. Specifically, a higher percentage of the population of the town was aged 60-84, whilst a smaller percentage of the population of the town was aged 0-34.
  - Registered offices for around 1,000 companies, making it the fifth largest employment centre in Shropshire and one of the main location of businesses and jobs in the east of the County. The largest employment sectors in Bridgnorth were manufacturing, retail and health, which together account for around 40% of the jobs in the town.
- 7.4. At the time of the 2011 Census:
  - Around 80% of the residents of the town were economically active (of which around 77% were employed and 3% were unemployed and looking for work). Of those in employment, the most popular means of travelling to work were by car or van (around 44%) or by foot (around 12%), whilst around 4% worked from home.
  - Of the 20% of the residents of the town that were economically inactive, the majority (around 63%) were retired, although some were students (around 12%), sick/disabled (around 11%), looking after home/family (around 10%), or other (around 5%).
  - Bridgnorth Place Plan Area supported a lower level of employment self-containment (around 39%) than that of any other Place Plan Area associated within a Strategic or Principal Centre (Shrewsbury around 62%, Oswestry around 59%, Ludlow around 48%, Market Drayton around 47% and Whitchurch around 42%). However, despite the comparatively low level of self-containment, the differential between the number of resident workers and the number of jobs is relatively small, with net commuting in and out across the Bridgnorth Place Plan Area broadly similar.

- Key origins of the workforce of the Bridgnorth Place Plan Area are the area itself (around 40%) the rest of Shropshire (around 24%), Telford and Wrekin (around 8%), Dudley (around 5%), South Staffordshire (around 4%) and Wolverhampton (around 4%).
  - Key destinations of the workforce of the Bridgnorth Place Plan Area are the area itself (around 38%), the rest of Shropshire (around 18%), Telford and Wrekin (around 14%), Wolverhampton (around 9%) and Dudley (around 6%).
- 7.5. Over the period from 2010 to 2015, the number of jobs in Bridgnorth fell by around 9% (around 400 jobs), which is the equivalent of the loss of 80 per annum. In comparison, the number of jobs in Shropshire rose by 2.9% over the same period. Although it should be noted that much of this is due to the decline in the number of public sector jobs, which was not compensated for by an equivalent increase in private sector jobs, which remained relatively stable.
- 7.6. In 2016, household income in the Bridgnorth Place Plan Area was higher than that for the rest of Shropshire, with 52% of households earning £30,000 or more.
- 7.7. Bridgnorth contains a mix of independent and national stores which are well used by local residents and those living in its large rural hinterland. The retail sector also assists in attracting visitors to the town, as does the town's heritage, natural environment and numerous annual events.
- 7.8. Whilst Bridgnorth does not have a main line railway station, the town has a station on the Severn Valley heritage line (from Bridgnorth to Kidderminster) and a funicular railway (from High Town to Low Town) both of which are very popular with tourists. The town also benefits from bus links to a number of locations including Shrewsbury to the west, Kidderminster to the south, Telford to the north and Wolverhampton to the east.
- 7.9. Housing completions in Bridgnorth have been low for a number of years, indeed during the five-year period from 2014/15 – 2018/19 just 115 dwelling completions occurred, equating to around 23 dwelling per annum. For comparison over the preceding five-year period from 2009/10 – 2013/14, 512 dwelling completions occurred, equating to around 102 dwellings per annum. Given these trends, it is considered that availability of land has constrained completions in recent years rather than there being a lack of demand in the town – there are very specific circumstances which have delayed the progression of the residential/mixed use allocation in the town, recent levels of completions are likely to have exacerbated this demand.
- 7.10. Employment completions in Bridgnorth achieved during the five-year period from 2014/15 – 2018/19 total some 2.7ha, primarily concentrated in Use Classes B2 General Industrial (1.8ha) and B8 Storage and Distribution (0.5ha). No significant completions were achieved within the preceding five-year period from 2009/10 – 2013/14. A number of factors have influenced this rate of delivery, likely including the availability of land. It is noted there are very specific circumstances which have delayed the progression of the main employment allocations in the town.
- 7.11. Please Note: Figures are rounded. A detailed profile of the market town of Bridgnorth which provides more detailed information about key local characteristics and issues is available here: <https://shropshire.gov.uk/media/9682/bridgnorth.pdf>.

### **Background - Stanmore Industrial Estate**

- 7.12. Stanmore Industrial Estate is a significant employment site associated with Bridgnorth, located to the east of the Low Town and inset within the Green Belt.

- 7.13. The Estate is part of the former non-flying, wartime RAF station (RAF Bridgnorth) which at its peak extended to around 70ha and had a floating population of several thousand. RAF Bridgnorth was developed as a major training facility and in 1945 was retained as a permanent training base with engineering as part of its activities. Many of the buildings were temporary in nature but there were a number of permanent workshops and the Ministry of Defence (MoD) developed two areas of housing (Russell's Close and The Hobbins) to accommodate officers and NCO's.
- 7.14. In the early 1960's the decision was made to close RAF Bridgnorth, the site was vacated in 1963 and subsequently sold in a number of lots. Buildings on one such lot, consisting of an area of around 18ha, were retained and used for employment purposes as Stanmore Industrial Estate.
- 7.15. Of the remainder of RAF Bridgnorth, housing at The Hobbins and Russell's Close were retained and used as housing for non-military personnel; whilst much of the remainder of the site was demolished, eventually cleared and planted forming Stanmore Country Park in the 1990's.
- 7.16. Since the early 1970's, Stanmore Industrial Estate has been the subject of a rolling redevelopment programme, during which many of the original RAF buildings have been demolished and replaced with a variety of sizes of single span structures better suited to modern occupiers' requirements. This process also included provision of better redevelopment process has continued to present day and makes an important contribution to ensuring the estate meets the needs of its various occupiers as well as enhancing the visual appearance of the site.
- 7.17. Reflecting the changing needs of the site's occupiers, over the years, many of the units have been combined with the smallest occupier now in a unit with 1,000sq ft (93 m2) and the largest in a number of units, totalling around 267,000 sq ft (24,805 m2).
- 7.18. Presently, the 18ha Stanmore Industrial Estate comprises around 635,000 sq ft (59,000 m2) of floorspace across 84 units, accommodating around 40 different businesses, many of which are associated with engineering and advanced manufacturing sector. In total, these companies employ in the region of 1,700 people. It is also home to the Marches Centre for Manufacturing and Technology CIC (MCMT) a state-of-the-art training centre for apprentices and as such is considered a 'centre of excellence for engineering and advanced manufacturing' and a key employment location in Shropshire. The centre was developed by a consortium of local companies located on the estate to compensate for skill shortages in the manufacturing sector.

### ***The Need for Development***

- 7.19. The strategic approach which underpins the emerging Shropshire Local Plan (captured within Policy SP2. Strategic Approach) seeks to ensure that *"Shropshire will flourish, accommodating investment and new development that contributes to meeting needs and making its settlements more sustainable"*. This is complemented by other policies within the emerging Shropshire Local Plan.
- 7.20. For instance, Policy SP12. Shropshire Economic Growth Strategy states that *"Shropshire will be the best place to do business and invest. The County will promote its economic potential by positively supporting enterprise, developing and diversifying the local economy, targeting growing and under-represented sectors and by using its high-quality assets and special environment. It will increase its productivity by improving digital and transport connectivity, making productive use*

*of low carbon energy sources, meeting skills needs, and by using the benefits of its local talent and business expertise.*

*The spatial strategy to achieve these objectives is to deliver sustainable economic growth and investment in our strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations.....”.*

- 7.21. To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, the strategic approach which underpins the emerging Shropshire Local Plan (again captured within Policy SP2. Strategic Approach), includes the principle of ‘urban focus’.
- 7.22. ‘Urban focus’ involves directing the majority of new housing and employment development towards those settlements with the most extensive range of services, facilities and infrastructure to support it. Specifically, settlements identified as Strategic, Principal and Key Centres and the newly identified Strategic Settlements.
- 7.23. Bridgnorth has been identified as a Principal Centre within the Local Plan Review, in recognition of the size of the town and the extensive range of services and facilities it offers to its residents and those residing within its extensive rural hinterland. Identification of Bridgnorth as a Principal Centre recognises and seeks to enhance the important strategic role the town performs in the east of Shropshire.
- 7.24. The strategic approach which underpins the emerging Shropshire Local Plan (again captured within Policy SP2. Strategic Approach) describes Principal Centres as follows: *“Principal and Key Centres will accommodate significant well-designed new housing and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential.”*
- 7.25. Reflecting on the role of the town, constraints present and identified issues and opportunities, Policy S3.1 Development Strategy: Bridgnorth Principal Centre, within the emerging Shropshire Local Plan proposes to deliver *“around 1,800 dwellings and make available around 49ha of employment land to create choice and competition in the market.”*
- 7.26. It also indicates that *“New housing and employment development will make provision for the needs of the town and its extensive rural hinterland, including attracting inward investment and allowing existing businesses to expand.”*
- 7.27. The nature and scale of future development proposals associated with the town recognise:
  - a. The strategic role that Bridgnorth plays in east Shropshire;
  - b. The importance of meeting the residential and employment needs of the town and its surrounding hinterland;
  - c. The low levels of residential completions achieved within the town over the last five years, exacerbating local need;
  - d. The opportunity to strengthen the towns economic role – providing sites for existing businesses to expand and to attract new businesses to the town;
  - e. The opportunity to help deliver a better balance between housing and employment in Bridgnorth, and
  - f. The potential to provide additional local employment opportunities to reduce the need to commute out of the town for work.

- 7.28. This approach is also supportive of the Economic Growth Strategy for Shropshire (2017-2021) which identifies an opportunity to *“support the cluster of activities and key sectors in Bridgnorth and work with existing companies on future plans.”* It is also supportive of The Marches Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP) (2019), which identifies Bridgnorth as an ‘opportunity town’ linked to its *“large manufacturing sector with supply chain links into the West Midlands.”*
- 7.29. Stanmore Industrial Estate is considered a ‘centre of excellence for engineering and advanced manufacturing’ due to the cluster of businesses within and associated with the engineering and advanced manufacturing sector and presence of the Marches Centre for Manufacturing and Technology CIC (MCMT) a state-of-the-art training centre for apprentices. As a result, it is considered to be a key employment location associated with Bridgnorth and one of the most successful centres for employment in Shropshire.
- 7.30. It should be noted that ‘advanced manufacturing including engineering, agri-food and agri-tech’ is one of the key growth sectors for the Shropshire economy, identified within the Economic Growth Strategy for Shropshire (2017-2021). Furthermore, a key principle within the vision for the Marches LEP as identified within the SEP (2019) is for the sub-region to be *“A global centre of excellence in advanced manufacturing specifically automotive, cyber security, and the next phase of technology development in agriculture, environment and food production.”*
- 7.31. Furthermore, the Shropshire Economic Growth Strategy (2017-2021) and The Marches LEP SEP (2019) identify an aspiration to increase Gross Value Added (GVA). This is particularly important in Shropshire as we have a relatively low GVA per head (according the Office for National Statistics (ONS) data<sup>6</sup> this was £19,900 per head in 2016), for comparison within the wider LEP, Herefordshire’s is some £20,738 per head, whilst Telford and Wrekin records some £22,244 per head. The average for the West Midlands Region is some £22,315 per head. This is primarily due to Shropshire’s dependence on traditional industries which are considered lower skilled. One of the most effective means of increasing GVA and GVA per head is providing more higher skilled jobs and more knowledge intensive industries. It is considered that the advanced manufacturing sector present on Stanmore Industrial Estate is one which can provide such opportunities, also directly reflecting the aspiration in Policy SP12 of increasing productivity by ‘meeting skills needs, and by using the benefits of its local talent and business expertise’.
- 7.32. Historically, Stanmore Industrial Estate had a stock of units available for immediate occupation, however due to high demand it is understood that there are currently limited opportunities on the site to accommodate this demand.
- 7.33. By way of example of this high demand cited by the Estate Managers is that in 2019, a block of 4 units totalling around 17,650 sq ft (1.640 m<sup>2</sup>) was fully modernised. Before work commenced, 3 of the 4 units were reserved by companies based within adjoining units, whilst the 4<sup>th</sup> was quickly let to a new business. The Estate Managers have also indicated that the Estate Office receive around 7-8 enquiries a week for units of around 2,000 – 5,000 sq ft (186 – 465 m<sup>2</sup>).

---

<sup>6</sup> ONS (2017), Regional gross value added (balanced) by local authority in the UK



- 7.34. It is understood in March 2020 Stanmore Industrial Estate had only three vacant buildings:
- The largest vacant unit is some 48,600 sq ft (4,500m<sup>2</sup>) which was vacated by Coram Showers in December 2019. A major refurbishment of this unit is to be undertaken before it is marketed.
  - The second vacant unit is some 4,800 sq ft (445m<sup>2</sup>) which is currently being refurbished prior to marketing.
  - The third vacant unit is around 1,050 sq ft (98m<sup>2</sup>) which is currently being marketed and it is understood that it is subject to active enquiries.
- 7.35. It is also understood that Stanmore Industrial Estate now has undeveloped land for less than 40,000 sq ft (3716 m<sup>2</sup>) of new buildings and that this land is likely to be fully developed before 2025.
- 7.36. As a result, there is limited development potential on the site to meet the needs of existing or new businesses over the medium- to long-term within the Local Plan review period. This limitation to the future development potential of Stanmore Industrial Estate will constrain the site's ability to contribute towards:
- The development strategy for Bridgnorth and in turn the wider strategy for Shropshire within the emerging Shropshire Local Plan;
  - The opportunity to *“support the cluster of activities and key sectors in Bridgnorth and work with existing companies on future plans”* identified within the Economic Growth Strategy for Shropshire (2017-2021) and support the activities of the Marches LEP, which identifies Bridgnorth as an ‘opportunity town’ linked to its *“large manufacturing sector with supply chain links into the West Midlands”* within its SEP (2019);
  - Expansion of the growth of the ‘advanced manufacturing sector including engineering, agri-food and agri-tech’ which is one of the key growth sectors for the Shropshire economy, identified within the Economic Growth Strategy for Shropshire (2017-2021);
  - Making Shropshire and the wider Marches LEP *“A global centre of excellence in advanced manufacturing specifically automotive, cyber security, and the next phase of technology development in agriculture, environment and food production”*, a key principle within the vision for the Marches LEP as identified within their SEP (2019); and
  - Supporting aspirations to increase GVA and GVA per head within the Shropshire Economic Growth Strategy (2017-2021) and The Marches LEP SEP (2019).

### ***Proposed Green Belt Release***

- 7.37. Having reflected on the strategic role of the town, known development constraints, identified issues and opportunities, and having reviewed the site promotions received within the town, the draft Local Plan proposes the majority of new development up to 2038 should be located outside the Green Belt. This approach is captured in draft policy S3.1 of the Draft Local Plan.
- 7.38. However, two areas of land are proposed for release from the Green Belt, specifically to allow for the growth and expansion of Stanmore Industrial Estate.



7.39. These areas are:

- Land north of Stanmore Industrial Estate (P58a), which is around 6.8ha. This site consists of two agricultural fields enclosed by Stanmore Industrial Estate to the south and south-west, an agricultural field boundary to the north-west, a path/agricultural field boundary to the east and Brook Lane/an agricultural field boundary to the north. The site is considered to be suitable for development (subject to demonstrating exceptional circumstances for removing the land from the Green Belt), available for development and achievable (including viable) for development, as such it represents a deliverable site.
- Land adjacent to Hickman Road, Stanmore Industrial Estate (STC002), which is around 4.6ha. The site was formerly part of the RAF Bridgnorth campus. Whilst much of the rest of the central part of the site was converted to an industrial estate, this component was allowed to naturalise. The site forms the gap between Stanmore Industrial Estate and dwellings at The Hobbins. The site is bounded by Stanmore Industrial Estate to the south, The Hobbins (road) to the north, Stanmore Country Park to the west and a field boundary/wooded area to the east. The site is considered to be suitable for development (subject to demonstrating exceptional circumstances for removing the land from the Green Belt), available for development and achievable (including viable) for development, as such it represents a deliverable site.

7.40. It should be noted that estimates of a sites-built capacity are based on an assumption that 40% of the site is developed.

### ***Green Belt Assessment and Review***

7.41. To inform the Shropshire Local Plan Review, a two-stage assessment of the Green Belt in Shropshire has been undertaken by specialist and experienced consultants and published by Shropshire Council.

7.42. The Green Belt Assessment (Part 1) considers the performance of Green Belt across Shropshire by dividing it into parcels of land and assessing each parcel (providing them a rating of no contribution; weak; moderate or strong) against the five nationally defined purposes that Green Belt serve, these are to:

1. check the unrestricted sprawl of large built-up areas;
2. prevent neighbouring towns merging into one another;
3. assist in safeguarding the countryside from encroachment;
4. preserve the setting and special character of historic towns; and
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.43. The Green Belt Review (Part 2) is focused on considering the potential harm to the Green Belt resulting from the release of parcels of land and areas of opportunity around identified settlements and strategic geographical locations, if they were identified to provide for development needs and support a sustainable pattern of future growth in the County to 2038 and beyond.

7.44. It should be noted that as Stanmore Industrial Estate is inset within the Green Belt, it is not itself considered within the Green Belt Assessment or Review.

7.45. Within the Green Belt Assessment and Review (Part 1 and Part 2), the two proposed sites for the expansion of Stanmore Industrial Estate are considered as part of two Green Belt parcels, these are P57 (which contains STC002) and P58 (which contains P58a).

7.46. The Green Belt Assessment (Part 1) of the performance of these parcels against Green Belt purposes 1a, 1b, 2, 3, & 4 is summarised in the table below.

Parcel Reference	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
P57	No contribution	No contribution	Weak	Strong	No contribution
P58	No contribution	No contribution	Weak	Moderate	No contribution

*Please Note: Purpose 5 is identified as important across all parcels, but the study considers that assessment of performance of individual parcels against this purpose is not possible in a meaningful way.*

7.47. This Green Belt Review (Part 2) indicates the harm to the Green Belt resulting from the release of the parcels which contain the two proposed allocations to allow for the expansion of Stanmore Industrial Estate, this can be summarised as follows:

Parcel Reference	Harm to the Green Belt Resulting from Release
P57	Moderate
P58	Moderate

7.48. Within the Green Belt Review (Part 2) two opportunity areas (Bn-2a and BN-3a) encompassing the entirety of the parcels containing the two sites proposed for release from the Green Belt, was also reviewed and identified as having moderate harm to the Green Belt if released.

### **Other Planning Considerations**

7.49. To inform the identification of proposed site allocations within the Local Plan Review, Shropshire Council has undertaken a comprehensive Site Assessment process. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of the overall vision, strategy and policies, as well as site allocations.

7.50. This Site Assessment process included consideration and identification of potential sites to accommodate the growth of Bridgnorth, including Stanmore Industrial Estate. Within this assessment it was concluded that these two sites proposed for release from the Green Belt were suitable, available, achievable and viable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt).

7.51. Key considerations within the site assessment process undertaken for STC002 included:

- The site is adjacent to and closely associated with Stanmore Industrial Estate.
- The site is located within flood zone 1.
- The site is not located within a source protection zone.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site has medium landscape and visual sensitivity to housing and employment development.
- The site formed part of the former RAF Bridgnorth but has naturalised and as such is considered Greenfield.
- The site benefits from good highway links, although any necessary improvements of the A454/A458 and A454/B4363 roundabout junctions would need to be undertaken.

- The site forms part of an environmental network and may contain priority habitats.
- The site contains mature trees, groups of mature trees and scrubland. There is also woodland adjacent to the site's eastern, southern and western boundaries.
- The site forms part of the former RAF Bridgnorth and formerly included part of the Bridgnorth racecourse.
- Adjacent employment uses represent a source of noise. Conversely it is also close to existing residential properties at The Hobbins, as such any noise generating uses on the site will require due consideration.

7.52. Key considerations within the site assessment process undertaken for P58a included:

- The site is adjacent to and closely associated with Stanmore Industrial Estate.
- The site is located within flood zone 1.
- Much of the site is located within a source protection zone 3.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site is located within two landscape parcels, which have medium and medium-high landscape and visual sensitivity to housing development and medium and high landscape and visual sensitivity to employment development.
- The site is Greenfield.
- The site benefits from good highway links, although any necessary improvements of the A454/A458 and A454/B4363 roundabout junctions would need to be undertaken.
- The site is adjacent to an environmental network corridor and may contain priority habitats and protected species.
- The site contains and is in proximity of mature trees and hedgerows.
- The site may have archaeological potential.
- Adjacent employment uses represent a source of noise.

### **Assessment of All Other Reasonable Options**

7.53. Paragraph 137 of the NPPF states:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.*

- 7.54. The two sites proposed for release from the Green Belt are specifically identified to facilitate the expansion of employment provision at Stanmore Industrial Estate. Therefore, consideration of alternatives has been undertaken as a two-stage process. First there has been a consideration as to whether there are alternative options to the expansion of Stanmore Industrial Estate and second there has been a consideration as to whether there are alternative opportunities to allow for the expansion of Stanmore Industrial Estate. These two stages are summarised below.

### **Alternative Options to the Expansion of Stanmore Industrial Estate**

- 7.55. As has already been summarised within this Statement, Stanmore Industrial Estate is considered:

- A ‘centre of excellence for engineering and advanced manufacturing’ due to the cluster of businesses within and associated with the engineering and advanced manufacturing sector and the presence of the Marches Centre for Manufacturing and Technology CIC (MCMT) a state-of-the-art training centre for apprentices. This Economic Growth Strategy for Shropshire (2017-2021) identifies the ‘advanced manufacturing including engineering, agri-food and agri-tech’ sector as one of the key growth sectors for the Shropshire economy. Furthermore, the vision for the Marches LEP as summarised within their SEP (2019) includes becoming *“A global centre of excellence in advanced manufacturing specifically automotive, cyber security, and the next phase of technology development in agriculture, environment and food production”*.
- A key location for employment associated with Bridgnorth, with the potential to support the achievement of the development strategy for Bridgnorth and in turn the wider strategy for Shropshire within the emerging Shropshire Local Plan. It also has the potential to *“support the cluster of activities and key sectors in Bridgnorth and work with existing companies on future plans”* identified within the Economic Growth Strategy for Shropshire (2017-2021) and support the aspirations of The Marches LEP, which identifies Bridgnorth as an ‘opportunity town’ linked to its *“large manufacturing sector with supply chain links into the West Midlands”* within its SEP (2019).

- 7.56. Reflecting on the above, it is apparent that Stanmore Industrial Estate presents unique characteristics to support commercial opportunities. Over many years a rolling investment programme has ensured that the site offers high-quality services and facilities, infrastructure and units which meet the needs of the modern occupier. It has attracted a cluster of businesses within and associated with the engineering and advanced manufacturing sector, all of which benefit from their ‘co-location’ on the site and together have contributed to creating ‘critical mass’ and the site’s strong reputation, as a ‘centre of excellence for engineering and advanced manufacturing’. The site has further enhanced its links to the engineering and advanced manufacturing sector through the establishment of the Marches Centre for Manufacturing and Technology CIC (MCMT); a state-of-the-art training centre for apprentices.

- 7.57. Ultimately the site is now considered to represent a locally, regionally and nationally important employment site and its expansion provides an opportunity to support the aspirations of the emerging Shropshire Local Plan, the Shropshire Economic

Growth Strategy (2017-2021) and vision of The Marches LEP as identified within their SEP (2019).

- 7.58. Having considered other reasonable options, including utilising suitable brownfield opportunities and underutilised land, and optimising site density, it is considered that whilst there are other locations associated with Bridgnorth where employment development can and will occur, it is not considered that these alternatives are directly comparable to the Stanmore proposition, and do not represent reasonable alternative options. This is because they would not allow for the expansion of the successful Stanmore Industrial Estate, would not meet the medium to long term needs of existing businesses on the site (having adjacent available land or units on or in proximity to their unit can facilitate expansion and minimise the need to travel to other locations as a result of operating over a split site, or alternatively needing to relocate in the entirety) and would not represent the significant opportunity associated with such expansion in terms of achieving the aspirations of the Local Plan, the Shropshire Economic Growth Strategy (2017-2021) and the vision of The Marches LEP as identified within their SEP (2019).
- 7.59. Other locations would primarily represent opportunities to establish new centres for employment and these are unlikely to appeal in the same way to existing businesses on Stanmore Industrial Estate and other businesses in the key sector present on Stanmore Industrial Estate, given that a key part of its appeal is its existing reputation and the cluster of existing businesses in the engineering and advanced manufacturing sector which create 'critical mass'. As such they will not make the same contribution to achieving the aspirations of the Local Plan, the Shropshire Economic Growth Strategy (2017-2021) and the vision of The Marches LEP as identified within their SEP (2019).
- 7.60. For instance:
- Employment land at Tasley allocated within the SAMDev Plan:
    - ELR011/b which totals around 10.8 ha (6.6 ha net of landscaping) is allocated specifically for the relocation of the existing livestock market together with its existing or alternative ancillary uses only (the current Livestock Market site is allocated for redevelopment as part of a mixed-use allocation within the SAMDev Plan). Suitable landscaping and woodland planting will be provided along the site edge.
    - ELR011/a which totals around 8.9 ha (6.7 ha net of landscaping) requires a new roundabout on the A458, provides the access to ELR011/b and is subject to appropriate landscaping. The site is allocated for a business park comprising offices, industrial and warehousing uses. There is an opportunity for future employment uses on the site to be in sectors which complement those on the adjacent employment allocation.
  - Employment land at Old Worcester Road (W039) which was allocated within the SAMDev Plan totals around 1.5 ha is allocated for employment uses with a presumption in favour of the development of recycling and environmental industries.
  - The proposed allocation of a sustainable urban extension at Land at Tasley south of A458 includes 16 ha of employment land. This land will be cross-subsidised by development of the wider allocation and it is envisaged that this land will be targeted towards office and research and development uses and occur over the duration of the Local Plan Review period, recognising the timescales required to establish a new significant employment location (the proposals at Stanmore



Industrial Estate could of course happen in the short- to medium-term given that they represent expansion of an established site).

- Opportunities for other greenfield sites are limited and again it is considered that without the reputation and the cluster of existing businesses in the engineering and advanced manufacturing sector which create 'critical mass', they would not appeal to the same employment sectors.

- 7.61. It is also acknowledged that establishing a new employment site is much more complex than expanding an existing site, as concluded within the Shropshire Employment Land Review (2019).
- 7.62. Any opportunities for the redevelopment, intensification or limited expansion of other existing employment sites in and around the town are limited and likely to primarily facilitate the needs of existing site occupiers.
- 7.63. As such, whilst these alternative options are considered very realistic opportunities for employment provision in the town, they are considered complementary rather than a reasonable alternative option to the expansion of Stanmore Industrial Estate. It is considered that this equally applies to opportunities to meet needs beyond the town and in neighbouring Local Authority areas.

### **Alternative Options for the Expansion of Stanmore Industrial Estate**

- 7.64. The first alternative option considered for the expansion of Stanmore Industrial Estate was densification. However, it is apparent that the Industrial Estate has an established built form, resulting from a rolling investment programme and responds to the needs of site occupiers. As such there are very limited opportunities for the densification of the site and any that do occur need to be very carefully undertaken to ensure that it does not detract from the functionality and appeal of the site. The site contains one further development parcel with capacity for around than 40,000 sq ft (3716 m<sup>2</sup>) of new buildings. Whilst this is a clear opportunity, it will not allow for the medium- and long-term expansion of the site.
- 7.65. Other alternative options for the expansion of Stanmore Industrial Estate, including using brownfield and under-utilised land were assessed through the detailed site assessment process undertaken by Shropshire Council to inform the Local Plan Review. In summary, all of these other options are located in the Green Belt and in using planning judgement, it is considered the two sites proposed for release from the Green Belt are the most appropriate locations to allow for the expansion of Stanmore Industrial Estate.

### **Exceptional Circumstances**

- 7.66. Paragraph 136 of the NPPF states:

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans”.*

- 7.67. Further, Paragraphs 138 of the NPPF states:

*“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.*

- 7.68. It is considered that there are a number of exceptional circumstances which support the proposed release of the two sites to allow for the expansion of Stanmore Industrial Estate. These can be summarised as follows:

### **Supporting the Role of Stanmore Industrial Estate**

- 7.69. Stanmore Industrial Estate is unique. Over many years a rolling investment programme has ensured that the site offers high-quality services and facilities, infrastructure and units which meet the needs of the modern occupier. It has attracted a cluster of businesses within and associated with the engineering and advanced manufacturing sector, all of which benefit from their ‘co-location’ on the site and together have contributed to creating ‘critical mass’ and the sites strong reputation, as a ‘centre of excellence for engineering and advanced manufacturing’. The site has further enhanced its links to the engineering and advanced manufacturing sector through the establishment of the Marches Centre for Manufacturing and Technology CIC (MCMT) a state-of-the-art training centre for apprentices.
- 7.70. It should be noted that ‘advanced manufacturing including engineering, agri-food and agri-tech’ is one of the key growth sectors for the Shropshire economy, identified within the Economic Growth Strategy for Shropshire (2017-2021). Furthermore, a key principle within the vision for the Marches LEP as identified within their SEP (2019) is “*A global centre of excellence in advanced manufacturing specifically automotive, cyber security, and the next phase of technology development in agriculture, environment and food production.*”
- 7.71. Demand for units on the site is very significant. An example of this high demand cited by the Estate Managers is that in 2019, a block of 4 units totalling around 17,650 sq ft (1.640 m<sup>2</sup>) was fully modernised. Before work commenced, 3 of the 4 units were reserved by companies based within adjoining units, whilst the 4<sup>th</sup> was quickly let to a new business. The Estate Managers have also indicated that the Estate Office receive around 7-8 enquiries a week for units of around 2,000 – 5,000 sq ft (186 – 465 m<sup>2</sup>).
- 7.72. Historically, Stanmore Industrial Estate had a stock of units available for immediate occupation, however due to high demand it is understood that there are currently limited opportunities on the site. Specifically, it is understood that in March 2020, Stanmore Industrial Estate had only three vacant buildings:
- The largest is some 48,600 sq ft (4,500m<sup>2</sup>) which was vacated by Coram Showers in December 2019. A major refurbishment of this unit is to be undertaken before it is marketed.
  - The second is some 4,800 sq ft (445m<sup>2</sup>) which is currently being refurbished prior to marketing.

- The third is around 1,050 sq ft (98m<sup>2</sup>) which is currently being marketed and it is understood that it is subject to active enquiries.
- 7.73. It is also understood that Stanmore Industrial Estate now has undeveloped land for less than 40,000 sq ft (3716 m<sup>2</sup>) of new buildings and that this land is likely to be fully developed before 2025.
- 7.74. If Stanmore Industrial Estate is to continue to perform and expand on its role as a 'centre of excellence for engineering and advanced manufacturing' there is a need to provide appropriate opportunities for the expansion of existing businesses and the co-location of other businesses, particularly those within the engineering and advanced manufacturing sector, then it is considered necessary to provide opportunities for expansion of the site in the short, medium and long term.
- 7.75. As such, facilitating the expansion of Stanmore Industrial Estate in order to ensure that it continues to perform and expand its role as a 'centre of excellence for engineering and advanced manufacturing' is considered an exceptional circumstance to justify the release of the two parcels of land from the Green Belt, specifically for the expansion of Stanmore Industrial Estate.
- 7.76. As summarised within the Bridgnorth (Stanmore) Assessment of All Other Reasonable Options section of this report, it is not considered that there are other alternative options to achieve this unique opportunity.

### **Supporting the medium- and long-term needs of existing businesses**

- 7.77. Stanmore Industrial Estate currently accommodates around 40 different businesses, many of which are associated with engineering and advanced manufacturing sector. In total, these companies employ in the region of 1,700 people.
- 7.78. In order to support the medium- and long-term needs of the site occupiers' appropriate opportunities are required for any necessary expansion. Given that operating from a single site brings many efficiency benefits, Stanmore Industrial Estate has an existing 'critical mass' of companies in the 'engineering and advanced manufacturing' sector and a strong reputation as a 'centre of excellence for engineering and advanced manufacturing', it is considered that any need for expansion of these businesses needs can best/only be met through provision of appropriate opportunities for expansion of the Industrial Estate.
- 7.79. Anecdotally, the Estate Managers at Stanmore Industrial Estate recently undertook a survey of existing businesses, of which 14 responded. The questions asked within this survey included *"If you wanted to expand would you do so at Stanmore (assuming suitable sized/priced accommodation available)? and If an adjacent unit became available, would it be of interest?"* According to the summary prepared by the Estate Managers, *"No occupier indicated any wish to expand in a location other than Stanmore."* Further *"All but one of the smaller occupiers (those in up to 5,000 sq ft) indicated an interest in being able to expand, preferably by taking an adjacent unit, or by moving, provided they could surrender an existing lease. 4 respondents indicated that a brand new unit would be of interest as their business would wish to portray a progressive, successful image."*
- 7.80. This is also considered to represent an exceptional circumstance to justify the release of the two identified parcels of land from the Green Belt, specifically to allow for the expansion of Stanmore Industrial Estate.

## **Attracting new businesses, particularly those in the ‘engineering and advanced manufacturing’ sector**

- 7.81. In addition to supporting the medium- and long-term needs of the current businesses located on Stanmore Industrial Estate, its expansion also offers perhaps an opportunity to attract other businesses into Shropshire that are based in the ‘engineering and advanced manufacturing’ sector.
- 7.82. This is because the site offers the opportunity to co-locate with the existing cluster of businesses within and associated with the engineering and advanced manufacturing sector on the site which have created a ‘critical mass’. It also offers a strong reputation, as a ‘centre of excellence for engineering and advanced manufacturing’. Finally, the sites attraction is further enhanced due to the presence of the Marches Centre for Manufacturing and Technology CIC (MCMT) a state-of-the-art training centre for apprentices.
- 7.83. This is also considered to represent an exceptional circumstance to justify the release of the two identified parcels of land from the Green Belt, specifically to allow for the expansion of Stanmore Industrial Estate.

## **Supporting the Strategic Role of Bridgnorth**

- 7.84. The Strategic Approach which underpins the Shropshire Local Plan includes an ‘urban focus’. ‘Urban focus’ involves directing the majority of new development towards those settlements with the most extensive range of services, facilities and infrastructure to support it. Specifically, settlements identified as Strategic, Principal and Key Centres and the newly identified Strategic Settlements. This of course includes Bridgnorth which is the third largest settlement by population in Shropshire and has been identified as a Principal Centre within the Local Plan Review.
- 7.85. Bridgnorth plays a strategic role in the east of the County, providing an extensive range of services and facilities and employment opportunities to its residents and those residing within its extensive rural hinterland.
- 7.86. The two sites proposed for release from the Green Belt would allow for the expansion of Stanmore Industrial Estate, a key location for higher value advanced manufacturing. This expansion will support the strategic role of the town in east Shropshire by enhancing employment opportunities.

## **Supporting the Aspirations of the Economic Growth Strategy for Shropshire**

- 7.87. Shropshire set out its economic growth vision in the Shropshire Economic Growth Strategy (2017 – 2021) that seeks *“To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high-quality assets”*.
- 7.88. This is reflected within Policy SP12. Shropshire Economic Growth Strategy of the Shropshire Local Plan, which states:
- “Shropshire will be the best place to do business and invest. The County will promote its economic potential by positively supporting enterprise, developing and diversifying the local economy, targeting growing and under-represented sectors and by using its high-quality assets and special environment. It will increase its productivity by improving digital and transport connectivity, making productive use of low carbon energy sources, meeting skills needs, and by using the benefits of its local talent and business expertise.*

*The spatial strategy to achieve these objectives is to deliver sustainable economic growth and investment in our strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations. This will take into account the special considerations in the Green Belt, Area of Outstanding Natural Beauty and the need to protect and improve areas of higher landscape value and the natural and historic environment.*

*Economic growth and investment will be supported in:*

- a. Shrewsbury to develop its role as the County Town and Strategic Centre;*
- b. The Principal Centres and Key Centres as the key employment and service centres;*
- c. The 'Strategic Corridors', 'Strategic Settlements' and 'Strategic Sites' identified in the Plan;*
- d. Community Hubs on saved allocations or windfall development on established employment areas or suitable sites or buildings for small scale employment generating uses.*
- e. Community Clusters and the Countryside through windfall development where the location, scale, land use and impacts of the proposals will conform with the existing land uses, settlement form and environmental qualities in accordance with relevant Policies of the Local Plan”*

7.89. Both the Economic Growth Strategy and the Explanation of Policy SP12 Shropshire Economic Growth Strategy recognise that Shropshire (and the wider Marches LEP) have a number of business sectors and clusters that are performing well with extremely successful companies operating in and around the County. Our strategy for these sectors is to work with companies investing in these enterprises and to support their growth in the competitive national and international economy. It will be important to ensure these companies find the locations and expansion opportunities they seek and can invest in the following activities:

- a. Advanced manufacturing including engineering, agri-food, and agri-tech;
- b. Visitor economy and heritage-based businesses;
- c. Environmental sciences and technologies;
- d. Creative and digital industries;
- e. Food and drink processing; and
- f. Health and social care.

7.90. As already summarised, within Shropshire, Stanmore Industrial Estate is a key location for engineering and advanced manufacturing. Allowing its expansion provides an opportunity for the site to make a significant contribution to achieving the economic growth vision identified within the Shropshire Economic Growth Strategy (2017 - 2021) and is consistent with the principle of supporting the growth of the advanced manufacturing sector.

7.91. Linked to this, the Marches LEP identifies Bridgnorth as an 'opportunity town' linked to its *“large manufacturing sector with supply chain links into the West Midlands” within its SEP (2019)*. Furthermore, the vision of the Marches LEP identified within their SEP (2019) includes establishing *“A global centre of excellence in advanced manufacturing specifically automotive, cyber security, and the next phase of technology development in agriculture, environment and food production.”* It is considered that facilitating the expansion of Stanmore Industrial Estate will also

facilitate the potential of the site contributing towards achieving the SEP (2019) for the Marches LEP.

- 7.92. Furthermore, the Shropshire Economic Growth Strategy (2017-2021) and The Marches LEP SEP (2019) identify an aspiration to increase Gross Value Added (GVA). This is particularly important in Shropshire as we have a relatively low GVA per head (according to the Office for National Statistics (ONS) data<sup>7</sup> this was £19,900 per head in 2016), for comparison within the wider LEP, Herefordshire's is some £20,738 per head, whilst Telford and Wrekin records some £22,244 per head. The average for the West Midlands Region is some £22,315 per head. This is primarily due to Shropshire's dependence on traditional industries which are considered lower skilled. One of the most effective means of increasing GVA and GVA per head is providing more higher skilled jobs and more knowledge intensive industries. It is considered that the advanced manufacturing sector present on Stanmore Industrial Estate is one which can provide such opportunities.

### **Green Belt Performance**

- 7.93. As summarised within the Bridgnorth (Stanmore) Green Belt Assessment and Review section of this statement, the Green Belt parcels which contain the two parcels of land proposed for release to allow for the expansion of Stanmore Industrial Estate Green Belt proposed for release:

- With regard to the nationally identified purposes for Green Belt, make no contribution to purposes 1a and 1b, weak contribution to purpose 2, a moderate and strong contribution to purpose 3 and no contribution to purpose 4. The assessment of the performance of parcels against purpose 5 is not possible in a meaningful way.
- Would result in moderate harm to the Green Belt.

- 7.94. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.

### **Site Boundaries**

- 7.95. Paragraph 139 of the NPPF states:

*“When defining Green Belt boundaries, plans should:*

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

---

<sup>7</sup> ONS (2017), Regional gross value added (balanced) by local authority in the UK



- 7.96. As documented within the Bridgnorth (Stanmore): ‘The Need for Development and Exceptional Circumstances’ sections of this statement, it is considered that removing the two parcels of land from the Green Belt in order to facilitate the expansion of Stanmore Industrial Estate is consistent with and will directly contribute to the development plans strategy for meeting identified requirements for sustainable development.
- 7.97. The extent of release proposed at Stanmore Industrial Estate is considered appropriate to provide opportunities for expansion of the site in the short, medium and long term, to ensure that changes to Green Belt boundaries endure for the longer term beyond the plan period.
- 7.98. The extent of the release proposed at Stanmore Industrial Estate aligns as best as practicable with strong defensible Green Belt boundaries. Specifically, identified boundaries are clearly formed by various physical features. Addressing each parcel in turn:
- Boundaries for land north of Stanmore Industrial Estate (P58a) are formed by:
    - Hedgerow field boundaries and Brook Lane to the north;
    - A path and agricultural field boundary to the east;
    - The existing Stanmore Industrial Estate to the south and south-west; and
    - Substantial hedgerow field boundaries to the north-west.
  - Boundaries for land adjacent Hickman Road, Stanmore Industrial Estate (STC002), are formed by:
    - The Hobbins (road) to the north;
    - A field boundary/wooded area to the east;
    - Stanmore Industrial Estate to the south; and
    - Stanmore Country Park to the west.

### ***Compensatory Improvements to the Green Belt***

- 7.99. The NPPF states that *“Where it has been concluded that it is necessary to release Green Belt land for development... They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”*.
- 7.100. In recognition of this requirement, the proposed Site Guidelines for land north of Stanmore Industrial Estate (P58a) includes measures to ensure:
- Substantial and effective boundary treatments, to create a buffer around the site.
  - An effective buffer to nearby residential properties.
  - The buffer to the north should provide a positive link to nearby woodland.
  - Provision of green infrastructure links through the site.
  - Retention of high-quality trees, woodland and priority habitats on the site.
  - Retention of the public right of way along part of the site’s southern boundary.
- 7.101. It also specifically includes the following guideline: *“Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.”*



7.102. Similarly, the proposed Site Guidelines for land adjacent Hickman Road, Stanmore Industrial Estate (STC002) includes measures to ensure:

- Substantial and effective boundary treatments, to create a buffer around the site.
- An effective buffer to The Hobbins and other residential properties.
- A design and layout that positively responds to the site's relationship with Stanmore Country Park and The Hobbins.
- Provision of green infrastructure links through the site.
- Retention of high-quality trees and priority habitats on the site.

7.103. It also specifically includes the following guideline: *“Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.”*

7.104. It is considered that these measures will result in direct and indirect benefits to the environmental quality and accessibility of the remaining Green Belt.

## 8. Shifnal

### *Introduction*

- 8.1. Shifnal has a growing population of around 7,000 persons (2016) and is the largest 'key centre' in Shropshire. The town lies in the M54/A5 corridor which is the primary strategic corridor through Shropshire.
- 8.2. Shifnal is the primary service centre for both its resident population and the smaller settlements and countryside across the northern area of the Shropshire Green Belt, in the east of the County.
- 8.3. Shifnal has experienced decades of restraint on its housing growth, which has resulted in significant demand for housing in the town. Shifnal needs to redress many years of under-provision, and so, the town now has a significant housing guideline of 1,500 dwellings to 2038 with land safeguarded for the provision of a similarly significant level of growth in the future.
- 8.4. Shifnal is a key local employment centre which has produced significant job growth in Shropshire. The employment offer is still not sufficiently broad or of sufficient quality to fully employ the relatively large working population and so, the town has the characteristics of a largely 'dormitory' settlement.
- 8.5. Shifnal is an 'inset' town completely enclosed within the Green Belt. The town lies within the M54 motorway corridor that forms the northern boundary to the settlement. The town is also located between M54 Junction 4 (west) and Junction 3 (east). From these junctions, the town is situated around the A464 Wolverhampton Road (south and east) that links with the A4169 Bridgnorth Road (west) at the principal Five Ways junction (west). The Five Ways junction also links to the B4379 Newport Road (north) passing close to the central Bradford Street/Aston Street junction linking to Stanton Road (east) and leading on to the A41 and M54, Junction 3.
- 8.6. Shifnal has a station stop on the rail line between Shrewsbury to Birmingham. The situation of the town places the community within easy commuting distance of Shrewsbury, Telford, Stafford, Wolverhampton, the Black Country and Birmingham. This is enhanced by the strategic road network and accessibility to other local railway stations at Telford, Cosford, Albrighton, Codsall and Bilbrook. This road and rail accessibility with the facility of parking at the locally accessible rail stations commends Shifnal to 'commuter' households.
- 8.7. The M54 motorway and rail line through the town reflect the varying topography through the settlement where these transport routes change between being 'in cut', at grade and elevated above the surrounding townscape. These effects on the rail line through the town elevate the route at key points in the townscape. This severs the urban area into two equal but separate parts north and south of the rail line which communicate through a small number of key bridging points in the town.
- 8.8. The topography also has an effect on the drainage of the town situated around the constrained watercourse of the Wesley Brook running through the centre west of the town. The course of the Wesley Brook has suffered from significant encroachment up to the banks of the brook affecting surface water runoff through the town and creating a significant historical flood risk.

## **Background - Shifnal**

8.9. In 2016, the start of the Local Plan Review period, Shifnal had:

- A population of around 6,900 persons and contained around 3,441 dwellings, making it the largest Key Centre in Shropshire, and the seventh largest town in Shropshire by population.
- A higher age profile than that for Shropshire and England. Specifically, a higher percentage of the population of the town was aged 65-80 but there is a much smaller population over 80 years. The town also has a smaller percentage of the population of the town aged 19 or younger. Shifnal's working age population is significant at 60.9% compared with the Shropshire average at 60%. The average age is also lower at 44 years.
- Registered offices for around 494 companies, making it the seventh largest employment centre in Shropshire and a key location of businesses and jobs in the east of the County. The largest employment sectors in Shifnal were arts/entertainment/recreation, construction and education, together accounting for around 45% of the jobs in the town.

8.10. At the time of the 2011 Census:

- Around 81% of the residents of the town aged 16–64 were economically active (of which around 77% were employed and 4% were unemployed and looking for work). Of those in employment, the majority are employees of businesses (86%) and the remainder are self-employed (14%). Most people in employment travel to work by car or van (around 50%) or by foot (around 6%), whilst around 5% worked from home.
- Of the 19% of the residents of the town that were economically inactive, the majority (around 61%) were retired, although some were students (around 11%), sick/disabled (around 12%), looking after home/family (around 11%), or other (around 5%).
- Shifnal Place Plan Area supported a lower level of employment self-containment (around 20%) than that of other contiguous Place Plan Areas (Bridgnorth around 39%, Market Drayton around 47% and Whitchurch around 42%). The low level of self-containment reflects the facts that considerably more people commute out of Shifnal to work than commute to the town for work. The net commuting in and out of the Shifnal Place Plan Area equates to nearly 1,000 more people commuting out of the town.
- The origins of the workforce of the Shifnal Place Plan Area are from Shifnal (around 25%) the rest of Shropshire (around 15%), Telford and Wrekin (around 36%), South Staffordshire (around 4%); Wolverhampton (around 4%), Stafford (around 2%), Birmingham (around 2%) and other locations (around 12%).
- Key destinations of the workforce of the Shifnal Place Plan Area are from Shifnal (around 17%), the rest of Shropshire (around 18%), Telford and Wrekin (around 40%), South Staffordshire (around 2%); Wolverhampton (around 7%), Birmingham (around 4%), Walsall (around 2%) and other locations (around 10%).

8.11. Over the period from 2010 to 2015, the number of jobs in Shifnal rose by around 28% (around 700 jobs). In comparison, the number of jobs in Shropshire rose by 2.9% over the same period. The lower rate of growth in the County relates to the decline in public sector employment with this loss not being compensated by increases in private sector jobs. Shifnal has been a key location for employment

growth in the County because it has a low reliance on public sector employment (around 10%).

- 8.12. In 2016, household income in the Shifnal Place Plan Area was higher than that for the rest of Shropshire, with 51% of households earning £30,000 or more making the town comparable with Bridgnorth.
- 8.13. Shifnal contains a mix of independent, franchised and national stores which are well used by local residents and those living in its large rural hinterland. The retail sector is important in meeting the everyday needs of its residents but provides only a limited share of the employment (around 5%) in the town.
- 8.14. Shifnal has an important railway station linking the town with the conurbation and other local stations on the route, notably Telford and Wellington in the adjoining built up area. The town also benefits from bus links to a number of locations including Telford to the west, Bridgnorth to the south and Wolverhampton to the east.
- 8.15. Housing completions in Shifnal have traditionally been very low over the past two decades as a consequence of the two-tier planning system. The former Local Planning Authority of Bridgnorth District Council took a cautious approach to the growth of Shifnal and this was not influenced to a significant degree by Shropshire County Council as the strategic planning authority. The rate of housing delivery in Shifnal from 2000 to 2009 up to the inauguration of Shropshire Council as the new unitary authority is shown below. This shows how the supply of new housing was significantly constrained providing an average annual rate of just 18 dwellings per year during the period. At this time, housing development in Shifnal, within a strategically significant transport corridor, was less than 2% of all housing development in the County.

Year	Completions in Shifnal	Completions in Shropshire	Proportion in Shifnal
	(dwellings)	(dwellings)	(%)
2000/01	10	1,071	0.9
2001/02	5	1,238	0.4
2002/03	22	1,090	2.0
2003/04	17	1,027	1.7
2004/05	2	1,162	0.2
2005/06	0	1,340	0.0
2006/07	44	1,228	3.6
2007/08	80	1,106	7.2
2008/09	-3	1,265	-0.2
2009/10	11	1,112	1.0
<b>TOTAL</b>	<b>188</b>	<b>11,639</b>	

- 8.16. This approach was also supported by regional policy in the West Midlands Regional Spatial Strategy that sought to focus development in the M54 corridor on the urban centres at Telford and Wolverhampton. The inauguration of Shropshire Council in 2009 coincided with the abolition of the West Midlands Regional Assembly and the removal of the RSS. In the period from 2009 to 2015, Shropshire Council sought to bring forward a new Local Plan in as a Local Development Framework. In the period up to the adoption of a newly allocated housing land supply, the shortfall in the five year supply of sites brought about some increase in small scale housing development shown below. This shows how the supply of new housing improved to deliver an average annual rate of over 60 dwellings per year during the period. At

this time, housing development in Shifnal increased to 6% of all development in the County.

Year	Completions in Shifnal	Completions in Shropshire	Proportion in Shifnal
	(dwellings)	(dwellings)	(%)
2010/11	56	984	5.7
2011/12	32	724	4.4
2012/13	57	847	6.7
2013/14	60	1,079	5.6
2014/15	31	1,155	2.7
2015/16	133	1,402	9.5
<b>TOTAL</b>	<b>369</b>	<b>6,191</b>	

- 8.17. Over the subsequent period from 2016 to 2019 housing completions have been influenced by the housing allocations in the adopted Local Plan 2006 - 2026. It is expected that the current rate of completions could result in the adopted housing land supply in both the current Local Plan and the Local Plan review being exhausted before 2024-25. The availability of land has therefore removed the traditional constraint on housing development and the market has responded accordingly. At this time, housing development in Shifnal has increased by a factor of 10 to a rate of 200 dwellings per year which is equal to a rate of over 10% of all housing development in the County.

Year	Completions in Shifnal	Completions in Shropshire	Proportion in Shifnal
	(dwellings)	(dwellings)	(%)
2016/17	197	1,910	10.3
2017/18	182	1,876	9.7
2018/19	226	1,843	12.3
<b>TOTAL</b>	<b>605</b>	<b>5,629</b>	

- 8.18. Employment completions in Shifnal achieved during the whole of the current local plan period total some 2ha initially to 2013 comprising Class B1c, B2 and B8 industrial/warehousing uses but subsequently from 2013 comprising Class B1a office uses.
- 8.19. Proponents of the Local Plan strategy draw on evidence from the Shropshire Council Strategic Housing Market Assessment to highlight the effects of the restraint on new housing development in Shifnal. This evidence has a direct relationship with national policy on Green Belt.
- 8.20. The slower rate of housing development in Shifnal has affected the affordability ratio in the town making Shifnal one of the most exclusive markets in the County. The evidence on this matter contends that for a household on a median income (£30,944) to purchase a median priced house in Shifnal (£230,998) they would require 7.5 times their income (the affordability ratio). This exceeds the Shropshire average ratio of 6.6 and slightly exceeds the national average, taking into account the London market.
- 8.21. For a household on a lower quartile income (£16,783) to purchase a lower quartile house (£169,950), they would require 10.1 times their income (the affordability ratio). This exceeds the Shropshire average ratio of 9.0 and the national average of 8.9. These are key statistics as they affect those people who might seek work in the larger employment sectors in Shifnal and those who might be employed in keyworker occupations.

- 8.22. Where the historical restraint does not continue to be lifted to refresh the supply of new housing in Shifnal, as evidenced since 2015-16 then the affordability of housing in Shifnal will continue to lie beyond the means of many wishing to enter this local housing market.
- 8.23. This would have a direct relationship with Green Belt policy on the requirement to both justify and not simply present, evidence of exceptional circumstances. It would particularly impact those parts of policy that require other reasonable options to be discounted before those exceptional circumstances are accepted particularly to discount options directing that the development needs of Shifnal might be met in alternative locations.
- 8.24. To maintain the existing Green Belt boundary around Shifnal will directly affect the housing market by maintaining the historical exclusivity and this will affect the ageing of the population, the availability of labour and the capacity to promote local economic growth and to increase the delivery of employment.
- 8.25. A number of factors have influenced the rate of employment land delivery, including the availability of land.

Settlement	Year of Completion	Employment Completions					TOTAL
		Class B1a	Class B1b	Class B1c	Class B2	Class B8	
		(hectares)					
<b>Shifnal</b>	<b>2006-2007</b>	-	-	-	<b>0.84</b>	<b>0.84</b>	<b>1.7</b>
	<b>2012-2013</b>	-	-	<b>0.17</b>	-	-	<b>0.2</b>
	<b>2016-2017</b>	<b>0.06</b>	-	-	-	-	<b>0.1</b>
	<b>2018-2019</b>	<b>0.12</b>	-	-	-	-	<b>0.1</b>
<b>Shifnal Total</b>		<b>0.19</b>	-	<b>0.17</b>	<b>0.84</b>	<b>0.84</b>	<b>2.0</b>

- 8.26. An additional 4ha were allocated in the town as two land parcels each comprising 2ha. There has been no take up of this land in the period from 2015 to 2019. The size and location of these land parcels have not provided viable investment opportunities particularly with one of the sites being located close to a proposed new housing development and subsequently lost to the provision of a 'care home' facility.
- 8.27. The quality of the land has also not been attractive on the second land parcel within an existing, accessed and serviced employment area. Albeit, the existing employment use had an overwhelming presence on this site.
- 8.28. Please Note: Figures are rounded. A detailed profile of the market town of Shifnal which provides more detailed information about key local characteristics and issues is available here: <https://shropshire.gov.uk/media/9691/shifnal.pdf>.

### ***The Need for Development***

- 8.29. The strategic approach which underpins the emerging Shropshire Local Plan (captured within Policy SP2. Strategic Approach) seeks to ensure that *“Shropshire will flourish, accommodating investment and new development that contributes to meeting needs and making its settlements more sustainable”*. This is complemented by other policies within the emerging Shropshire Local Plan.
- 8.30. For instance, Policy SP12. Shropshire Economic Growth Strategy states that *“Shropshire will be the best place to do business and invest. The County will promote its economic potential by positively supporting enterprise, developing and diversifying the local economy, targeting growing and under-represented sectors and by using its high-quality assets and special environment. It will increase its productivity by improving digital and transport connectivity, making productive use*



*of low carbon energy sources, meeting skills needs, and by using the benefits of its local talent and business expertise.*

*The spatial strategy to achieve these objectives is to deliver sustainable economic growth and investment in our strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations.....”.*

- 8.31. To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, the strategic approach which underpins the emerging Shropshire Local Plan (again captured within Policy SP2. Strategic Approach), includes the principle of ‘urban focus’.
- 8.32. ‘Urban focus’ involves directing the majority of new development towards those settlements with the most extensive range of services, facilities and infrastructure to support it. Specifically, settlements identified as Strategic, Principal and Key Centres and the newly identified Strategic Settlements.
- 8.33. Shifnal has been identified as a Key Centre within the Local Plan Review. It is the largest settlement in the north of the Shropshire Green Belt. In recent years there has been significant residential expansion of the town, not all of the growth being plan-led, but instead being the product of the Council’s lack of a five year housing land supply in 2013 and 2014.
- 8.34. The Strategic Approach which underpins the emerging Local Plan (captured in Draft Policy SP2 – Strategic Approach) describes Key Centre settlements as follows “Principal and key Centres will accommodate significant well-designed new housing and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential”.
- 8.35. Shifnal is located on the M54 strategic corridor, which broadly runs between Wolverhampton and Shrewsbury, via Telford. The town is also well served by the main Shrewsbury-Birmingham rail line. Reflecting on the role of the town, constraints present and identified issues and opportunities, not least the location of the settlement in relation to the Strategic Corridor, Policy S15.1 of the draft Local Plan Review proposes to deliver around 1,500 dwellings and make available 41 hectares of employment land to provide choice and competition in the market.
- 8.36. The nature and scale of future development proposals associated with the town recognises:
  - The location of Shifnal as a Key Centre on the Strategic Corridor;
  - The current demands placed on the town in relation to recent rapid levels of housing development;
  - The need to allocate only moderate levels of new housing development given the significant levels of completions and commitments since the start of the plan period in 2016;
  - The impact of the in-balance between the delivery of significant levels of housing development without associated employment levels, and the related potential this has to exacerbate the dormitory nature of the town;
  - The opportunity to strengthen the town’s economic role – providing sites for existing businesses to expand and to attract new businesses to the town; and
  - The need to deliver additional employment provision for the town to help secure local employment opportunities and reducing the impact of out-commuting.

- 8.37. This approach is supported by the Economic Growth Strategy for Shropshire (2017-2021) which identifies the M54/A5 East growth corridor as an area of future opportunity to support the economic growth needs of the County. Furthermore, the Marches LEP SEP (2019) identify an aspiration for increase Gross Value Added (GVA), which is particularly important in Shropshire due to the relatively low GVA per head (according to office for national Statistics (ONS) data this was £19,900 per head in 2016, which does not compare favourably with the wider LEP area in Herefordshire and Telford & Wrekin.
- 8.38. It is recognised there is a degree of conflict in relation to two significant considerations affecting the growth of Shifnal, namely its strategic location, and associated good accessibility, in contrast to the desire locally to maintain a ‘village’ community. The Local Plan has sought to address this conflict by seeking to secure a sustainable and balanced strategy for the town, with the primary issue being seeking to secure a better balance between the currently committed and likely future scale of housing, reflecting on the current deficit in employment land provision and the largely low-quality employment opportunities in the town.
- 8.39. In seeking to redress this balance, whilst also seeking to utilise the town’s strategic location, it is considered there is both a need and an opportunity to identify sufficient long-term growth options for the town both in the current plan period to 2038 and beyond. The town’s opportunities to accommodate this level of strategic growth is significantly hampered by the Green Belt surrounding the town on all sides. The need and opportunity presented in the current Plan period is therefore to seek to balance employment growth with housing growth by 2038. Beyond 2038, the intention is to seek a more mixed and balanced growth through a planned strategy. It is considered that to achieve these aspirations, Green Belt land must be released for development.
- 8.40. The level of need and opportunity is based on two key assumptions. Firstly, that employment land is developed out to 40% of the total land area, which takes into account the need for suitable levels of buffering, landscaping, servicing, access arrangements, and other on-site issues contributing to the delivery of a sustainable employment development. In applying this approach, it is considered that about 40 hectares will deliver around 16 hectares of built development. Secondly, it is assumed that commercial buildings will be developed as single storey properties.
- 8.41. In the case of Shifnal, realistic investment opportunities will provide Class B2 and B8 uses to service the sub-regional supply chains along the A5, M54 and M6 corridors and with some E(g) uses and secondary employment uses to meet local needs for employment in Shifnal and in the east of the County.

### ***Proposed Green Belt Release***

- 8.42. In addition to the review of the Green Belt, the process of considering the release of land from the Green Belt has reflected on the role of Shifnal, the constraints present, the identified issues and the opportunities presented in this town situated within a principal strategic corridor through Shropshire. This has also considered the site promotions received for development within and around the town. The effect has been that most of the development proposed to support the development strategy for Shifnal is located within the town and outside of the Green Belt. This is the case for all the new housing development proposed in the Local Plan to meet the needs of Shifnal to 2038.
- 8.43. Three areas of land are proposed for release from the Green Belt, specifically to allow for the growth and expansion of the employment area around Shifnal

Industrial Estate and to provide for the future housing needs of the town beyond 2038.

8.44. These areas are:

- Land east of Shifnal Industrial Estate (P13 and P14) which is around 53ha. This site consists of:
  - two separate groups of agricultural fields situated to the east of Upton Lane on Parcel P13 (SHF018d around 25ha) and to the west of Upton Lane on Parcel P14 (SHF018b around 14ha). These two groups are bounded north by Stanton Road and the Shrewsbury to Birmingham rail line to the south. Parcel P13 is bounded to the east by existing field boundaries and visually contained by the tree line and woodland extension of Ruckley Pool further east within the lands of the Ruckley Estate. Parcel P14 is contained by eastern boundary of the Shifnal Industrial Estate and the campus and curtilage land of the Hillcrest Shifnal School. These land parcels have been promoted for development as suitable sites for the new employment area proposed for Shifnal (subject to demonstrating exceptional circumstances for removing the land from the Green Belt), available for development and are achievable (including viable) with a number of parties interested in their delivery and as such, represent a deliverable area for employment development.
  - a series of physically screened and relatively isolated paddocks situated at the junction of Stanton Road and Lamledge Lane (4.5 hectares). This area extends east and south around the campus of the Hillcrest Shifnal School and up to the northern boundary of Shifnal Industrial Estate (9.4ha). This area is already well contained given the land cover around and within these paddocks that comprise the western part of Parcel P14. The openness of this western area therefore arises more from the relationship and physical connection to the open agricultural land in the east (of Parcel P14) and less to the character of the paddocks themselves. The land on the northern edge at the junction of Stanton Road and Lamledge Lane has been promoted and is considered to be suitable for employment development (subject to demonstrating exceptional circumstances for removing the land from the Green Belt), available for development and achievable (including viable) representing a location for the extension of the proposed new employment area for Shifnal. The land around the Hillcrest Shifnal School is largely (and would become more) physically separate from the Green Belt, should Parcels P13 and P14 be released for development. These paddocks are therefore indicated for release by virtue of becoming fully divorced from the Green Belt around the town.
- Land to the south and west of Shifnal around Lodge Hill between the A464 and A4169 (Parcels P15, P16 and P17) which is around 69ha. This site consists of:
  - Land between A464 (south) and Park Lane which is around 10ha of Parcel P15 (combined sites SHF019 and P15b or collectively SHF019VAR). The site comprises two linked agricultural paddocks to the south-east of Shifnal adjoining existing developments within land already safeguarded for development to the west. The site is screened from the built form of the town to the west by its tree lined boundary but carries urban utilities infrastructure. The site is also screened from the Green Belt and countryside landscape to the east by the local topography that forms a ridgeline along the eastern boundary of the land. The land is bounded to the north by the A464 and to

the south by Park lane. Consequently, the land is physically connected to the town through its visual containment and the highway and utilities infrastructure serving the urban area. The land has been promoted for development and is considered to be suitable (subject to demonstrating exceptional circumstances for removing the land from the Green Belt), available for future development and achievable as part of a strategic extension to the town (including viable) representing a deliverable location for future growth and development.

- Land between Park Lane and A4169 / the western rail line at Lodge Hill which is around 59ha of Parcels P16 and P17 (including site SHF017 with P16). This extensive area of land is situated between Park Lane (south) and the A4169 on Parcel P16 sitting around the lower slopes of Lodge Hill. The land then extends from the A4169 (west) up to the western rail line which cuts through Parcel P17. Parcel P16 comprises the landholding of Lodge Hill Farm and to the south contains the farmstead and home fields of this ongoing agricultural enterprise. Parcel P16 to the north contains the watercourse and tightly contained flood plain of the Wesley Brook. This area also comprises one of the reputed locations of the historical former settlement at Shifnal known as Idsall. Land to the north of the A4169 comprises open land that forms part of the setting of the town overlooked by the elevated railway and with views into the open urban edge of the town. The site is considered to be suitable for development (subject to demonstrating exceptional circumstances for removing the land from the Green Belt), available for future development and achievable as part of a strategic extension to the town (including viable) representing a deliverable location for future growth and development.

### ***Green Belt Assessment and Review***

- 8.45. To inform the Shropshire Local Plan Review, a two-stage assessment of the Green Belt in Shropshire has been undertaken by specialist consultants and published by Shropshire Council.
- 8.46. The Green Belt Assessment (Part 1) considers the performance of Green Belt across Shropshire by dividing it into parcels of land and assessing each parcel (providing them a rating of no contribution; weak; moderate or strong) against the five nationally defined purposes that Green Belt serve, these are to:
- a. check the unrestricted sprawl of large built-up areas;
  - b. prevent neighbouring towns merging into one another;
  - c. assist in safeguarding the countryside from encroachment;
  - d. preserve the setting and special character of historic towns; and
  - e. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 8.47. The Green Belt Review (Part 2) is focused on considering the potential harm to the Green Belt resulting from the release of parcels of land, areas of opportunity around identified settlements and strategic geographical locations, if they were identified to provide for development needs and support a sustainable pattern of future growth in the County to 2038 and beyond.

8.48. In the Green Belt Assessment and Review (Part 1 and Part 2), there are three locations in the Green belt around Shifnal that are considered for release to provide for the current future development of the town as follows:

- the release of land for the current and ongoing employment needs of the town alongside the existing Shifnal Industrial Estate are considered as part of two Green Belt Parcels at P13 (west) and P14 (east).
- the release of land for development in the east of Parcel P14 would bring the remaining area of this Parcel within the built form of Shifnal and this land become largely isolated from the Green Belt around Shifnal. The release of Parcel P14 (west) will support the existing and proposed mixed uses at the employment area around Shifnal Industrial Estate.
- the release of land to provide for the future growth of Shifnal to the south and west of the town are considered as part of three contiguous Green Belt Parcels at P15 (west), P16 and P17 (south-east).

8.49. The Green Belt Assessment (Part 1) of the performance of these parcels against Green Belt purposes 1a, 1b, 2, 3, & 4 is summarised below.

Parcel Reference	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
<b>P13</b>	No contribution	No contribution	Moderate	Strong	No contribution
<b>P14</b>	No contribution	No contribution	Moderate	Moderate	Weak
<b>P15</b>	No contribution	No contribution	Moderate	Moderate	Moderate
<b>P16</b>	No contribution	No contribution	Moderate	Moderate	Moderate
<b>P17</b>	No contribution	No contribution	Strong	Moderate	Strong

*Please Note: Purpose 5 is identified as important across all parcels, but the study considers that assessment of performance of individual parcels against this purpose is not possible in a meaningful way.*

8.50. This Green Belt Review (Part 2) indicates the harm to the Green Belt resulting from the release of the parcels which contain elements of the RAF Cosford Strategic Site, this can be summarised as follows:

Parcel Reference	Harm to the Green Belt Resulting from Release
<b>P13</b>	High
<b>P14</b>	Moderate-High
<b>P15</b>	Moderate-High
<b>P15 Sh-1a</b>	Moderate
<b>P16</b>	Moderate-High
<b>P17</b>	High

8.51. Within the Green Belt Review (Part 2) three opportunity areas (Sh-1, Sh-2 and Sh-3) encompassing the entirety of the parcels containing the three proposed locations for development were identified for potential release from the Green Belt.

8.52. These were reviewed and opportunity areas Sh-1, Sh-2 and Sh-3 were found to each have a high harm to the Green Belt if released. These findings were influenced by the large land area contained within these groupings of parcels.



8.53. Looking at Opportunity Area Sh-1 in finer detail, it was found that a sub-opportunity area Sh-1a could be identified within Parcel P15, in relation to the local topography and character of this area. This much smaller land area comprising two separate areas of land, was found to have a much lower Moderate harm to the Green belt if the land was released.

### ***Other Planning Considerations***

8.54. To inform the identification of proposed site allocations within the Local Plan Review, Shropshire Council has undertaken a comprehensive Site Assessment process. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of vision, objectives and policies and site allocations.

8.55. This Site Assessment process included consideration and identification of potential sites to accommodate the growth of Shifnal. Within this assessment it was concluded that sites SHF018b and SHF018d (within Parcels P13 and P14) should be proposed for release from the Green Belt as they are suitable, available, achievable and viable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt).

8.56. Key considerations within the site assessment process undertaken for sites SHF018b and SHF018d included:

- The western extent of the area is adjacent to both the existing Shifnal Industrial Estate and the Hillcrest Shifnal School and extends east to Upton Lane serves as a peripheral access road in the east of the town. The site is, however, part of the countryside forming agricultural land around the eastern edge of the town.
- The site is located within flood zone 1.
- Site SHF018b is located in source protection in zone 1 in the north-west of the site and zone 2 across the remainder of the site. SHF018b is located within source protection zone 2 with zone 3 in the south-east of the site.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The sites have medium and medium-high landscape and visual sensitivity to housing development and medium-high landscape and visual sensitivity to employment development.
- The site is Greenfield.
- The sites benefit from good highway links requiring improvements to Stanton Road and onward at the junctions with the A41 and M54 Junction 3. Site accessibility is affected by the poor quality of Upton lane south of the rail line with its link to the A464.
- The sites lie within an environmental network corridor and may contain priority habitats and protected species.
- The site contains and is in proximity of mature trees and hedgerows.
- The adjacent highways and railway may represent a source of noise.

8.57. This Site Assessment process included consideration and identification of potential sites to accommodate the growth of Shifnal. Within this assessment it was concluded that the residual area of Parcel P14 should be proposed for release from

the Green Belt as they are suitable, available, achievable and viable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt).

8.58. Key considerations within the site assessment process undertaken for site P14 included:

- The site is adjacent to and closely associated with the Hillcrest Shifnal School, Shifnal Industrial Estate and housing development currently under construction.
- The site is located within flood zone 1.
- The site is located within a source protection zone 1 to the north-east and the remainder of the site is zone 2.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The sites have medium and medium-high landscape and visual sensitivity to housing development and medium-high landscape and visual sensitivity to employment development.
- The site is Greenfield.
- The site benefits from good highway links to Stanton Road accessed in part from Lamledge Lane through the Hillcrest School Campus.
- The site is within an environmental network corridor and may contain priority habitats and protected species.
- The site contains and is in proximity of mature trees and hedgerows.
- The site may have archaeological potential.
- Adjacent employment uses represent a source of noise.

8.59. This Site Assessment process included consideration and identification of potential sites to accommodate the growth of Shifnal. Within this assessment it was concluded that sites SHF019VAR (comprising sites SHF019 and P15b in Parcel p15) should be proposed for release from the Green Belt as they are suitable, available, achievable and viable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt).

8.60. Key considerations within the site assessment process undertaken for SHF019VAR included:

- The site is adjacent to and closely associated with the edge of the built area of the town and carries urban utilities infrastructure.
- The site is located within flood zone 1.
- The site is located within a source protection zone 3.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site has medium-low landscape sensitivity due to its physical containment within the local topography but medium-high visual sensitivity to housing development and medium landscape and high visual sensitivity for employment development.
- The site lies in the countryside and is considered to be Greenfield.

- The site benefits from good highway links to the A464 and Park Lane although necessary improvements to the A464 and a highway junction would need to be undertaken.
- The site forms part of an environmental network and may contain protected species or priority habitats.
- The site contains mature trees, groups of mature trees and hedgerows and ponds that will need to be protected and buffered within any development.
- The site may have archaeological potential.
- The adjacent A464 may represent a source of noise and a filled historical pond on site may require treatment for ground contamination.

8.61. This Site Assessment process included consideration and identification of potential sites to accommodate the growth of Shifnal. Within this assessment it was concluded that site SHF017 (within Parcels P16 and P17) should be proposed for release from the Green Belt as they are suitable, available, achievable and viable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt).

8.62. Key considerations within the site assessment process undertaken for SHF017 included:

- The site lies in the open countryside to the south-west and west of the town.
- The site is largely located within flood zone 1 with some flood risk around the course of the Wesley Brook.
- The site is located within a source protection zone 3.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site is located within two landscape parcels, which have medium and medium-low landscape sensitivity and medium and medium-high visual sensitivity to housing development and medium-high and medium landscape sensitivity and medium-high and high visual sensitivity to employment development.
- The site is Greenfield.
- The site benefits from good highway links to the A4169, although any necessary improvements to the A4169 to form a junction and improve traffic flows and improvements to the principal Five Ways junction would need to be undertaken.
- The site is adjacent to an environmental network corridor and may contain priority habitats and protected species.
- The site contains and is in proximity of mature trees and hedgerows.
- The site is close to listed and other heritage assets and may have archaeological potential.
- The adjacent highway might represent a source of noise.

8.63. This Site Assessment process included consideration and identification of potential sites to accommodate the growth of Shifnal. Within this assessment it was concluded that the residual area of Parcel P16 should be proposed for release from the Green Belt as the land is suitable, available, achievable and viable (subject to

demonstrating exceptional circumstances for the release of the land from the Green Belt).

- The site lies in the open countryside to the south of the town.
- The site is largely located within flood zone 1 with some flood risk due to proximity to the Wesley Brook and surface water flows around the town and associated with Lodge Hill.
- The site is located within a source protection zone 3.
- The site is located within the Green Belt (see the above summary of the performance of the parcel containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from its release).
- The site is located within two landscape parcels, which have medium-low and medium landscape sensitivity and medium-high and medium visual sensitivity to housing development and medium and medium-high landscape sensitivity and high and medium-high visual sensitivity to employment development.
- The site is Greenfield.
- The site benefits from some highway links to Park lane but would require access to sites SHF019Var to gain access to the A464 and to site SHF017 to gain access to the A4169 with necessary junction and highway improvements to be undertaken.
- The site is adjacent to an environmental network corridor and may contain priority habitats and protected species.
- The site contains and is in proximity of mature trees and hedgerows.
- The site is close to listed and other heritage assets may have archaeological potential.
- The adjacent highway may represent a source of noise.

### **Assessment of All Other Reasonable Options**

8.64. Paragraph 137 of the NPPF states:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.*

8.65. The two land areas proposed for release from the Green Belt are identified to facilitate the long term growth of Shifnal through the development of:

- an urban housing extension to the south and south-west of the town;

- a new employment area to the east of the town.

8.66. The consideration of alternatives to these proposals has been undertaken as a two-stage process. Firstly, whether there are opportunities to better accommodate the development within the existing built form of Shifnal. Secondly, whether there are better locations in which to accommodate the 'unmet' needs of Shifnal rather than amending the Green Belt boundary and releasing land for immediate development or by safeguarding land for development at some future date. These two stages are summarised below.

#### Opportunities in Shifnal

8.67. Firstly, it must be recognised that the release of Green belt land is being considered because the proposals in the Local Plan review have taken the expansion of the urban area of Shifnal up to the existing Green Belt boundaries. These boundaries were established in the review of the Green Belt in 1996, which safeguarded land for future development. The current proposals in the Local Plan review propose this remaining safeguarded land for housing development to meet the needs of Shifnal in the period to 2038.

#### Greenfield Options

8.68. A small area of safeguarded land remains between Lamledge Lane and Revell's Rough south of the rail line on the eastern edge of the town. This land is currently inaccessible without significant highway improvements to Lamledge Lane which would necessitate further highway improvements to connect this area to principal highway network.

8.69. This could be achieved either by improving the viaduct over the railway to connect with the northern part of Lamledge Lane or by improving the southern part of Upton Lane to connect to the A464 Wolverhampton Road. At this time, there are no proposals in the Local Plan review to achieve either of these objectives. Opportunities to use the remaining safeguarded land have therefore been exhausted. This means there are no greenfield options that do not require the release of Green Belt land around Shifnal.

#### Brownfield Options

8.70. The site assessments for the land parcels proposed for development within the built form of Shifnal do include some brownfield sites. The assessments of these sites are presented in the evidence base for the Local Plan review. Where these sites are suitable for development this is identified in the recommendations for the relevant site assessments.

8.71. The recommendations identify these brownfield sites as only having potential for windfall housing development as they are all small sites of around 1 hectare or less and are all situated within existing residential areas. This means there are no brownfield options with sufficient capacity to meet the needs of the town for new employment land or to meet the longer term development needs for housing beyond 3028.

#### Densification Options

8.72. The absence of significant brownfield options and the almost full utilisation of the remaining greenfield options provided by safeguarded land means that there are no densification options that would obviate the need to release further Green Belt land to meet the development needs of Shifnal in the period to 2038 for employment uses and beyond 2038 to provide for the longer term housing needs of the town.



### Opportunities in Shropshire beyond Shifnal

- 8.73. Secondly, it must be recognised that the Council consulted in Winter 2017 to identify a preferred distribution of development for the settlement hierarchy. The preferred distribution each of the principal settlements of the County was confirmed in the subsequent consultation for preferred development sites in the Winter 2018.
- 8.74. In the context of the settlement hierarchy, it is possible to identify other settlements where the longer-term development needs of Shifnal might be satisfied. The principal alternative locations are those higher order settlements in proximity to Shifnal along the principal strategic corridors through the County. This would comprise Bridgnorth on the A442 as the principal market town in the east of Shropshire. Market Drayton on the A41 as the closest principal market town on the north-east of the County. Finally, Shrewsbury on the M54/A5 corridor as the principal Strategic Centre in Shropshire.
- 8.75. In the context of the Local Plan review, the effect of relocating development from Shifnal to one of these other centres would be to achieve an over-supply of housing or employment land in the alternative settlement compared with the preferred distribution of development for that settlement. It would be necessary, therefore for the preferred alternative settlement to have the capacity to receive the 'unmet' development needs of Shifnal.
- 8.76. The Local Plan review has set out an urban focused strategy in which each of the principal settlements have already taken a significant amount of development. It would be fair to conclude that, in the context of this strategy, the only settlement with the capacity to function as an alternative location for development to meet the 'unmet' needs of Shifnal would be Shrewsbury as the Strategic Centre for the County.
- 8.77. This approach is likely to raise a matter of principle in relation to national policy on Green Belts. To relocate the 'unmet' development needs of Shifnal to Shrewsbury as the Strategic Centre of the County would appear to satisfy the requirements of NPPF paras 137 to 138. This would then obviate the need to consider the existence of exceptional circumstances under NPPF para 136.
- 8.78. The act of relocating 'unmet' need, whilst being in conformity with national policy, does not, in itself, influence either the market demand for development in Shifnal nor does it provide the means through which the industry response to this market demand can be managed. The relocation of the 'unmet' need obviates the need to address the exceptional circumstances but national policy in NPPF para 144 provides the means by which the industry may seek to test the relocation of that need under further considerations presented as 'very special circumstances' to outweigh any adverse effects of releasing land from the Green Belt to meet the needs of Shifnal around the town itself.
- 8.79. The Council considers that the exceptional circumstances for releasing Green Belt land around Shifnal to meet the development needs of the town should be heard as part of the Local Plan review.
- 8.80. The reasons for this, relate to the need for Shifnal to properly perform its role and function in the settlement hierarchy following years of under provision of development in the town. The Council considers that where these exceptional circumstances are not heard, it would result in further submissions for the release of Green Belt land on the basis of 'very special circumstances', again relating to the need for the town to properly perform its role and function.

8.81. The Council believes that these exceptional circumstances do outweigh the harm from releasing land from the Green Belt and may also be considered to constitute 'very special circumstances' for the release of Green Belt should Shifnal's development needs be met in another location. The Council therefore intends that these exceptional circumstances should be heard and tested through the process of the Local plan review.

#### Opportunities beyond Shropshire

8.82. The Council have made a request to neighbouring local authorities under the Duty to Co-operate within national policy to determine whether any 'unmet' development needs for Shifnal may be met in locations beyond Shropshire.

8.83. There have been no indications from other local authorities that this is a reasonable option open to Council to meet the development needs of Shifnal.

8.84. In relation to authorities to the east, South Staffordshire District Council have not made an offer and could only offer alternative Green Belt land releases or opportunities further north into the northern Staffordshire area. The Black Country have already agreed a counter request for Shropshire to receive a proportion of their 'unmet' need.

8.85. In relation to authorities to the north, Stafford District Council have not made such an offer and the distance to this urban centre is unlikely to deflect market demand away from Shifnal. This is true of the northern development option that might have been available within South Staffordshire District Council.

8.86. In relation to authorities to the west, Telford & Wrekin Council have not made such an offer neither have any Welsh authorities. The complementary roles of Telford and Shrewsbury means the Strategic Centre of Shrewsbury is an equally viable option to the west of Shifnal.

8.87. In relation to authorities to the south, there have been no offers from Herefordshire or any of the Worcestershire authorities. The strategic role of Bridgnorth to the south of Shifnal means this higher order market town is an equally viable option to the south of Shifnal.

### **Exceptional Circumstances**

8.88. Paragraph 136 of the NPPF states:

*"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans".*

8.89. Further, Paragraphs 138 of the NPPF states:

*"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to*

*land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.*

- 8.90. It is considered that there are a number of exceptional circumstances which support the proposed release of the two areas of Green Belt that are promoted for development in the Local Plan review and for safeguarding to meet the future needs of Shifnal.

### **Addressing the ‘dormitory’ characteristics of Shifnal**

- 8.91. Shifnal has a low level of self-containment with only 25% of the resident population working in the town and these people occupying only about 17% of the employment in the town. This significantly underutilises the community asset in Shifnal which has a relatively younger population than most of Shropshire with an average age of 44 years. This has provided a larger pool of people of working age (61%) with a higher level of economic activity (81%) that is expressed in a higher level of employment (77%) with the majority seeking employee jobs with businesses in and beyond the town (86%).
- 8.92. The situation of Shifnal places the community within easy commuting distance of Shrewsbury, Telford, Stafford, Wolverhampton, the Black Country and Birmingham. This arises from proximity to the strategic road network and accessibility to other local rail stations at Telford, Cosford, Albrighton, Codsall and Bilbrook. This road and rail accessibility with the facility of parking at the locally accessible rail stations commends Shifnal to ‘commuter’ households.
- 8.93. These factors have encouraged the growth of a younger and more active population with a significant pool of economically active people despite the housing restraint. The reversing of the Shropshire trend towards an ageing population is capable of being taken further in Shifnal, by easing the housing restraint, to provide greater benefits to the Shropshire economy. A significant and growing pool of labour would be an economic asset in both the sub-regional area along the M54 corridor and most importantly, in the east of Shropshire, close to the market town of Bridgnorth.
- 8.94. These positive benefits have been held back through three core factors:
1. The planned restraints on new housing in Shifnal has adversely affected the affordability ratio in Shifnal to levels that exceed those in Bridgnorth, recognised as one of the most exclusive housing market areas in Shropshire. In Shifnal, the restraint on housing has significantly slowed the rate of growth of the town and the accessibility of the community to migrants into the County particularly younger migrants seeking good quality residential areas close to the conurbation. In turn, this has also affected the capacity of the resident population and particularly younger people to remain in Shifnal or to return to the town from higher education or from employment elsewhere.
  2. A significant and growing pool of labour provides an important asset for the growth of existing and new businesses. This in turn, has the potential to reverse the process of out-commuting by providing local employment for those who leave the town for work to create a more vibrant community and local economy. The creation of employment in Shifnal has been affected by the lower quality of the existing employment areas at Shifnal Industrial Estate to the east of the town and the Old Smithfield Industrial Estate at Aston Street in the area around the central railway station. The planned provision of new land for employment development in Shifnal has also been limited. The provision by Bridgnorth District Council of

land at Lamledge Lane to the north of Shifnal Industrial Estate only resulting in the development of the Hillcrest Shifnal School. The planned provision by Shropshire Council in the SAMDev Plan has currently resulted in no new employment provision.

3. The significant level of out-commuting creates a very particular need for retailing, services and facilities in the town. A significant proportion of the population commute from the town each working day and may access retailing and many services at their place of destination. This pattern of behaviour also develops a reliance on travelling to reach services rather than seeking to access them in Shifnal. This particularly builds a reliance on accessing services provided in the neighbouring urban centre of Telford and at the M54 Junction 4 services at Knowle Bank. Shifnal's retail and service offer is therefore more similar to a village setting than to a significant town on the M54 corridor this particularly affects the ability to undertake 'bulk' food shopping and to access petrol filling station services.

### **M54 Strategic Corridor and 'unmet' need in the Black Country**

- 8.95. Shropshire proposes to accept a degree of 'unmet' housing need from the Black Country equal to 1,500 dwellings. In accepting this degree of 'unmet' need, Shropshire has not stated where this additional housing need is expected to be met within the County nor does the Local Plan make any specific land allocations for the development to meet this need.
- 8.96. Those people in housing need whose demands will be met in Shropshire currently would secure a home in the Black Country. This indicates that the needs of these people are most likely to be met within or close to the M54/A5 strategic corridor. This area is therefore most likely to contain their key areas of search for housing beyond the Black Country. Further, in meeting the needs of these people in Shropshire, their eventual choice housing and place of residence will also be influenced to a large degree by the Local Plan strategy for Shropshire and its principal 'urban' focus.
- 8.97. The settlements located along the M54/A5 strategic corridor and those located in the east of Shropshire are therefore likely to play key roles in the delivery of housing to satisfy this 'unmet' need in Shropshire.
- 8.98. Shifnal as the primary settlement in Shropshire, located on the strategic corridor is therefore likely to play a key role in the satisfying this need, and its proximity to the Black Country is likely to promote the town within the migrant's key areas of search. The characteristics of Shifnal already identified in this assessment of exceptional circumstances will also influence this outcome including the accessibility of the town and the age profile of the community. Other factors are likely to include the Green Belt setting of the town, the historical character of the townscape and the complementary role of neighbouring Telford.
- 8.99. The enclosure of the town within the Green Belt without further provision for future growth will prevent Shifnal contributing to this objective.

### **Supporting the Aspirations of the Economic Growth Strategy for Shropshire**

- 8.100. Shropshire set out its economic growth vision in the Shropshire Economic Growth Strategy (2017 – 2021) that seeks "To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high-quality assets".

8.101. This is reflected within Policy SP12. Shropshire Economic Growth Strategy of the Shropshire Local Plan, which states:

*“Shropshire will be the best place to do business and invest. The County will promote its economic potential by positively supporting enterprise, developing and diversifying the local economy, targeting growing and under-represented sectors and by using its high-quality assets and special environment. It will increase its productivity by improving digital and transport connectivity, making productive use of low carbon energy sources, meeting skills needs, and by using the benefits of its local talent and business expertise.*

*The spatial strategy to achieve these objectives is to deliver sustainable economic growth and investment in our strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations. This will take into account the special considerations in the Green Belt, Area of Outstanding Natural Beauty and the need to protect and improve areas of higher landscape value and the natural and historic environment.*

*Economic growth and investment will be supported in:*

- a. Shrewsbury to develop its role as the County Town and Strategic Centre;*
- b. The Principal Centres and Key Centres as the key employment and service centres;*
- c. The ‘Strategic Corridors’, ‘Strategic Settlements’ and ‘Strategic Sites’ identified in the Plan;*
- d. Community Hubs on saved allocations or windfall development on established employment areas or suitable sites or buildings for small scale employment generating uses;*

8.102. The Economic Growth Strategy and the Explanation of Policy SP12. Shropshire Economic Growth Strategy recognise the potentially significant contribution of Shropshire’s strategic corridors linking the County with the national motorway and strategic road network and with other urban centres especially Birmingham/Wolverhampton and the Black Country.

8.103. This is reflected within Policy SP14 Strategic Corridors of the Shropshire Local Plan, which states:

*“The Shropshire Economic Growth Strategy seeks to deliver a ‘step change’ in the capacity and productivity of the local economy. To contribute to this aim, ‘Strategic Corridors’ along the principal rail and strategic road routes through the County will be the primary focus for major employment development especially along ‘strategic corridors’ with both rail and road connectivity. Major employment development in the County will be expected to recognise that:*

- 1. The strategic approach in Policy **Error! Reference source not found.** seeks to deliver significant development and infrastructure investment within the ‘strategic corridors’ served by the principal rail network and strategic and principal road networks in Shropshire.*
- 2. Development in the ‘strategic corridors’ through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy. Development likely to affect an internationally designated wildlife site, through atmospheric emissions must comply with the requirements for a project level HRA in accordance with policy **Error! Reference source not found.***



3. *Development on these ‘strategic corridors’ will be located in accordance with the following sequential preference:*
  - a. *In Shrewsbury or the Principal or Key Centres on an allocated site;*
  - b. *On the identified ‘Strategic Sites’ in the Local Plan;*
  - c. *On appropriate windfall development sites which are:*
    - i. *Located immediately adjoining Shrewsbury or a Principal or Key Centre; and*
    - ii. *Brownfield sites with direct access to the rail and road routes in the corridor; or*
    - iii. *Greenfield sites in exceptional circumstances where the:*
      - *Strategic objectives of national and local policy are fully satisfied and comply with Policy **Error! Reference source not found.**;*
      - *Proposal will strengthen the role and function of strategic settlements particularly Shrewsbury and the Principal Centres;*
      - *Proposal is a large and significant investment opportunity that cannot reasonably access sequentially preferable sites;*
      - *Proposal will:*
        - *Deliver the greenfield site as a fully serviced and developed employment area,*
        - *Meet the needs of the proposed ‘end user’ or occupiers; and*
        - *Deliver off-site infrastructure investments within the ‘strategic corridor’.*

- 8.104. Shifnal is located in the principal M54/A5 strategic corridor through Shropshire and has the potential to make a significant contribution to the local, sub-regional and regional strategies of the West Midlands region.
- 8.105. Shifnal can build on its strategic location and accessibility due to its proximity to two junctions onto the M54 motorway and its associated accessibility through the strategic road network and the rail network into the metropolitan area. These factors indicate the investment potential of the town where opportunities to support existing businesses and to attract new business are provided in the town.
- 8.106. In the Shropshire context, Shifnal has the capacity to support the key role performed by Bridgnorth as the principal market town in east Shropshire. Bridgnorth is recognised by The Marches Local Economic Partnership as an ‘opportunity town’ linked to its “large manufacturing sector with supply chain links into the West Midlands” within its SEP (2019). Furthermore, the Marches SEP (2019) seeks to establish “A global centre of excellence in advanced manufacturing specifically automotive, cyber security, and the next phase of technology development in agriculture, environment and food production.”
- 8.107. Shifnal has the potential to support the retention of key employers in Bridgnorth through the establishment of supply chain companies to support key local employers or to attract additional companies within this key growth sector. Shifnal also has the potential to provide a key source of labour which would improve the self-containment of the town by reducing out-commuting.
- 8.108. In the sub-regional context, Shifnal may fulfil the same functions in support of growth at key locations along, and linked to, the M54 corridor. This may have a positive affect for Telford, Stafford, Wolverhampton and the Black Country. These effects may also positively affect strategic investment locations in the corridor including the existing i54 (Jaguar Land Rover) and the proposed West Midlands



Strategic Rail Freight Interchange supported by the proposed M54 to M6 link road. In turn, this may have a positive effect in helping to contain the volume and distance of the commuting flows from Shifnal.

- 8.109. It is important to consider Shifnal in the context of the strategic economic planning along the M54 corridor. The existing and proposed strategic investment in both infrastructure and new business locations in this sub-regional area will require settlements with growth potential to fulfil their role and function in ways that support the wider sub-regional strategy.
- 8.110. This approach is considered preferable to placing the reliance on principal centres within the M54 corridor at Telford and Wolverhampton/Black Country supported by more distant centres at Bridgnorth and Stafford to deliver the sub-regional strategy. This seeks to change the approach previously adopted in the West Midlands Regional Spatial Strategy, discontinued in 2009.

### **Strategic Role and Function of Shifnal**

- 8.111. Shifnal is considered to be a 'Key Centre' within the settlement hierarchy for Shropshire and in the east of the County. In this role, Shifnal is the largest Key Centre in the County in terms of its population which has started to increase at a greater rate following the increase in the release of land for housing development in the SAMDev Plan (2015).
- 8.112. Shifnal performs this role across the east of the County in support of the principal market town at Bridgnorth and with its complementary role alongside the urban centre of Telford. The assessment of exceptional circumstances above also identifies further elements of the role and functions of Shifnal in relation to:
- the potential to increase the self-containment and sustainability of the community through the promotion of increased rates of housing development and new employment provision;
  - the potential to deliver a better balance between the provision of new housing and the opportunities for the growth of existing businesses and the establishment of new enterprises primarily through the release of land for this development and particularly to create an opportunity for a new employment area on the edge of the town to reduce the 'dormitory' character of the settlement;
  - the capacity to fully utilise the proximity of Shifnal to the conurbation and the significant accessibility of the town to two junctions along the M54 strategic corridor. To permit the town to serve as a key location in the area of search for migrants unable to enter the housing market in the Black Country to help satisfy the identified 'unmet' housing need;
  - to build local demand for retailing, services and facilities to create a 'critical mass' for investment in the services available to the community; and
  - to deliver progressive investment in the critical infrastructure of the town to enable the settlement to serve the community effectively.
- 8.113. The enclosure of the town in the Green Belt without further provision for future growth will prevent Shifnal contributing to these strategic objectives.

## **Improving existing provision for employment development**

8.114. Shifnal has two principal employment areas within the town for Class B2 and B8 uses with E(g) uses and secondary employment uses to meet local needs for employment. These areas are:

- Shifnal Industrial Estate and Lamledge Lane - located on the eastern edge of town. This comprises the Lamledge Lane campus of Severn Trent Water with key employer J N Bentley and the separate Industrial Estate situated around the historical industrial buildings of former Edge's Chain Works and now comprising the later additions of factory unit, workshops, storage buildings and open storage. The estate comprises a number of waste recycling companies, car repair and maintenance operations, other small enterprises and a single factory producing specialist ornaments and figurines for the collector's market.
- Old Smithfield Industrial Estate – located to the east of the railway station on Aston Street in the centre of town. This comprises small workshops and open storage on the site of the former livestock market. The estate comprises a mix of small workshop enterprises and leisure services.

8.115. Shifnal also had a largely redundant industrial estate at the former Springhill Trading Estate. This became a brownfield redevelopment opportunity in the SAMDev Plan and has subsequently been redeveloped as part of a 215 dwelling housing estate in the centre-east of the town at the junction of Aston Road/Stanton Road/Coppice Green Lane.

8.116. The redevelopment of Springhill Trading Estate was part of a significant release of land for development in Shifnal in the SAMDev Plan. This included not only the Springhill brownfield redevelopment but also sites from the supply of safeguarded land released from the Green Belt in the review undertaken in 1996. The remaining safeguarded land has subsequently provided only a limited number of small scale development opportunities with no potential to significantly refresh and improve the employment land offer in Shifnal.

8.117. The need to refresh and improve the employment land offer is an important component of changing the capacity of Shifnal to fulfil the role of the town in the settlement hierarchy of Shropshire in particular to enable the town to function as a key settlement within the M54 strategic corridor.

8.118. This objective has been addressed in the evidence for the Local Plan in the M54 Strategic Corridor Study that concluded this location is ripe for investment due to:

- the strategic corridor location between Wolverhampton to the east and Shrewsbury to the west closely related to the West Midlands conurbation and the associated opportunities of the Midlands Engine;
- the adjacent international occupiers in target growth sectors for Shropshire i.e. advanced manufacturing/automotive/engineering;
- the accessible infrastructure network and the benefits of pipeline infrastructure investment in road/rail over the coming years; and
- the higher education and training institutions including key assets like RAF Cosford, Harper Adams University, University Centre Shrewsbury.

8.119. Furthermore, the town of Shifnal contributes to opportunities in the M54 corridor using land along Stanton Road to the east of the town where the:

- area adjacent to the Lamledge Estate could provide a natural extension to the existing employment area;

- development of this site could contribute in part to meeting Shropshire's vision of balanced growth and could provide much needed employment land to address the current imbalance between residential and employment uses in the area; and
- mitigation of constraints would enable development to bring forward this strategic opportunity site with much needed employment accommodation.

8.120. The enclosure of the town in the Green Belt without further provision for future growth will prevent Shifnal contributing to these strategic objectives.

### **Meeting the needs of business**

8.121. Shifnal has seen significant employment growth in the Shropshire context. This growth has come not only from the overall increase in the number of jobs but also as a result of the much lower loss of employment in the public sector relative to the rest of Shropshire. The significance of the employment growth in Shifnal is therefore partly in proportion to the level of employment losses in other areas of the County. This significance is therefore a relative factor.

8.122. Employment in Shifnal is limited to some degree by the reliance of the town on the arts/entertainment/recreation, construction and education sectors as the largest employment sectors in the town.

8.123. Employment is also limited in terms of the number of jobs on offer to the economically active members of the community of working age between 16 to 64 years. The quality of this employment is also not sufficiently high to persuade economically active residents of Shifnal who commute out of town to work, to seek employment in the town.

8.124. A key limiting factor in the employment offer is the quality and quantity of land available to businesses wishing to settle or to expand in the town. Despite the significant employment growth in Shifnal, the reality is that the town does not meet the needs of businesses and the predominant factor in the growth of Shifnal particularly since 2015, is the provision of housing for commuters.

8.125. The employment areas that do exist in the town have operated for many decades and these commercial premises no longer meet the contemporary accommodation needs of businesses.

8.126. The Local Plan review has sought to redress these shortfalls through the release of Green Belt land for the creation of a new employment area. This land release seeks to provide for development to meet the needs of businesses for modern commercial premises.

8.127. Initial indications about this land release show there are a number of investors prepared to bring this land forward to development by accessing and servicing the land. These investors also indicate, there are a number of businesses prepared to occupy land and premises in this location, to utilise the locational benefits of Shifnal's position in the M54 corridor.

8.128. The enclosure of the town in the Green Belt without further provision for future growth will prevent Shifnal contributing to these strategic objectives.

### **Community Vitality**

8.129. The contextual information about Shifnal indicates two key factors about the population profile of the town. There is a relatively lower level of people over the

age of 80 years and a relatively lower level of people under the age of 19 years compared to the rest of Shropshire.

- 8.130. This would suggest that as people reach a point in life when they require personal care services, a significant number of these people may leave the town to receive this care in other places such as Telford. These statistics also suggest that the younger population are affected by either a relatively smaller cohort and by the migration from the town to education and work in other places.
- 8.131. Therefore, whilst Shifnal has a relatively healthier population with a lower average age profile than the rest of Shropshire, there are some sensitivities in this population profile affecting the robustness of the community to change.
- 8.132. The lower cohort of younger people affects the capacity of the population to continue to sustain its relatively younger age profile indefinitely. The lower cohort of older people suggest that in the longer term, the community may be susceptible to a sudden and significant reduction in older population cohorts. This has not been a significant factor in population changes to date, but recent experiences with unexpected infection epidemics and the increasing severity of seasonal infections places communities with particularly polarised age profiles at risk from these effects.
- 8.133. The historical planned restraint in the growth of housing in Shifnal would suggest this is not a particularly advantageous strategy for the sustainability of the community. The current strategies in the SAMDev Plan and the Local Plan review seek to redress this balance by promoting significant levels of growth followed by periods of assimilation. This will permit population change to refresh the vitality of the community through progressive growth allowing new residents to be assimilated into the existing culture and organisation of the town rather than bringing with them sudden and unexpected change.
- 8.134. The enclosure of the town in the Green Belt without further provision for future growth will prevent Shifnal from benefitting from these objectives.

### **Settlement Sustainability – investment programme**

- 8.135. The settlement has also been adversely affected by the historical planned restraint in the growth of housing in Shifnal and the failure to promote and deliver progressive growth in both the employment offer and the availability of commercial land and premises. The adverse effects of these shortcomings in the planned strategy for Shifnal have been expressed in the limited scale of investment in the infrastructure of the town and in the range and quality of the retailing, services and facilities available to the resident population.
- 8.136. This has been expressed in the ways in which the changes in the rate of growth arising from the SAMDev Plan in 2015 have overtaken the capacity of services in the town particularly for education and the GP surgery.
- 8.137. This is also evident in the capacity of the highway network through and around the town where strategic improvements to principal junctions are necessary along with many minor improvements to local roads and junctions to facilitate the effective operation of the network. This has also expressed itself in terms of the timing of these improvements with many such changes being required within a relatively short timeframe.
- 8.138. Shifnal requires a progressive and steady rate of growth to permit the infrastructure of the town to be improved in response to the requirements of new development. This will refresh and upgrade the infrastructure of the settlement to the benefit of the whole community.

8.139. The enclosure of the town in the Green Belt without further provision for future growth will prevent Shifnal from benefitting from these objectives.

### **Settlement Sustainability – structural constraints**

8.140. Shifnal has two particular structural problems with spatial implications for the growth of the town.

8.141. Shifnal lies across the rising land in the catchment of the River Worfe fed by the Wesley Brook lying on the south-west edge of the town. The disposition of development across this catchment may affect drainage towards the Brook and so development likely to significantly increase surface water flow as anticipated from housing development is better located to the south and west of the town.

8.142. The historical growth of the town has also severely constrained the watercourse of the Wesley Brook encroaching almost to the edge of the watercourse. As a consequence, the Wesley Brook will flood the town as soon as the watercourse reaches 'bank full' because the floodplain already accommodates significant development. The floodplain also provides no room for the watercourse to alter its course in response to pressures created by its discharge or to respond to local conditions in the channel. The Brook is therefore in need of a strategic flood management solution expected to be identified through a recently completed hydraulic assessment of the watercourse and the town.

8.143. Lying at the junction of several key road routes through east Shropshire, Shifnal accommodates two strategic junctions at 'Five Ways' to the west (A464 / A4169 / B4379) and the town centre junction of Victoria Road (A464) with Bradford Street/Broadway (B4379) and Aston Street/Stanton Road (A41 / M54 Junction 3 link). These junctions also receive significant traffic volumes both from through traffic using Shifnal as a strategic navigation point and from local traffic accessing different neighbourhoods within the town. Traffic volumes and pressures on the two junctions place them in need of improvement and the Shifnal Integrated Transport Scheme has proposed a regeneration scheme for the highway junction in the town centre.

8.144. The significant constraints at these junctions indicate that development generating significant traffic movements and larger vehicle access such as commercial development is better located to the east of the town. This spatial approach will facilitate access to the A41/M54 Junction 3 link along Stanton Road to direct traffic away from Five Ways and the town centre junction.

8.145. Future development in Shifnal will identify and address further opportunities to continue to improve the highway network to accommodate and manage traffic flows through the town.

### **Green Belt Performance**

8.146. The Green Belt Assessment and Review section of this statement for Shifnal, shows that Parcel P15 contains a smaller opportunity area SH-1a that is proposed for release that comprises:

- effects on the nationally identified purposes for Green Belt that make no contribution to purposes 1a and 1b, moderate contribution to purpose 2, a moderate contribution to purpose 3 and a moderate contribution to purpose 4. The assessment of the performance of parcels against purpose 5 is not possible in a meaningful way.



- whilst the release of the whole Parcel P15 would result in a Moderate-High effect, the release of SH-1a would only have a Moderate effect. In seeking to identify an area of land for safeguarding, the effect of releasing SH-1a indicates land to the south is a more appropriate location.
- 8.147. The Green Belt Assessment and Review section of this statement for Shifnal, also indicates that Parcel P17 to the west of Shifnal will have a High harm if released from the Green Belt. This is also true for Parcel P13 with its significant separation from the eastern edge of the town. In addition to this, land around the north of the town, to the north-west at Parcel P10 and north-east at parcel P11 would also have a High harm from their release.
- 8.148. The lowest achievable effect from Green Belt land release around Shifnal is therefore a Moderate-High harm on the eastern and south-western edges of the town. This has provided the focus for Green Belt land releases and the effects of any proposed release has been largely confined to this effect.
- 8.149. There have been three further considerations in this matter:
- the release of land for employment development to the east of the town has included land with a High harm to the Green Belt. This outcome has been unavoidable due to the significant scale of the proposed land release in order to meet both the immediate and longer-term needs of the town. This also provides an area for development that will enable the provision of the necessary strategic infrastructure as a viable investment.
  - the release of land for safeguarding for future development to the south and south-west of the town focused around an area where a sub-opportunity area SH-1a will partially reduce the harm from the release of land from the Green Belt from Moderate-High to Moderate harm.
  - the initial scale of the release of land for safeguarding to the south and south-west of the town also included land due west of Shifnal with a High harm from its release. This was initially considered to be unavoidable to achieve the scale of development and the particular beneficial impacts on the highway infrastructure of the town.
    - This proposal has subsequently been reduced in scale to retain the land to the west of town within the Green Belt. This has reduced the infrastructure investment and the benefits to the highway network from the safeguarded land but has protected the openness of the Green Belt and maintained the land between Shifnal and Telford.

## **Site Boundaries**

8.150. Paragraph 139 of the NPPF states:

*“When defining Green Belt boundaries, plans should:*

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded*



*land should only be granted following an update to a plan which proposes the development;*

*e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*

*f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

- 8.151. As documented within the Shifnal assessment in relation to the Need for Development, Proposed Green Belt Release, All Other Reasonable Options and Exceptional Circumstances in this statement. It is considered that removing the proposed land parcels from the Green Belt to the east, south and south-west of Shifnal is consistent with and will directly contribute to the development plan strategy for meeting the preferred distribution of development. This will fulfil the need for sustainable development in Shifnal and will ensure the town fulfils its role and function in the settlement hierarchy.
- 8.152. The extent of the land releases proposed around Upton Lane for employment and between the A464 and the A4169 and up to the western rail line are considered appropriate to provide opportunities for the growth of the town.
- 8.153. The provision of land for employment development at Upton Lane seeks to provide sufficient land to provide for a net developable area of 16 hectares. This seeks to ensure that the Green belt land release will have a significant development time horizon to obviate the need to seek further Green Belt land releases for some considerable time into the future. This will help to ensure that the proposed new Green Belt boundaries will become permanent limits to development well beyond 2038.
- 8.154. The provision of land for safeguarding to meet the longer-term development needs of Shifnal have been carefully controlled. This has been achieved through the removal of a proposal to release land north of the rail line in the area between Shifnal and Telford to the west of the town.
- 8.155. These land releases have been identified in areas that provide strong boundaries for the Green Belt to ensure that the new boundaries will be defensible and will become permanent as part of the proposed developments. These areas are extensive despite the reasonable precautions taken in releasing this land and so, strong boundaries do not exist around the whole area. The identified boundaries are clearly formed by various physical features and by specific locations in the landscape, but further works will be required to the boundaries to ensure their permanence.
- 8.156. Addressing each land area in turn:
- Boundaries for Parcel P14 land south of Stanton Road are formed by:
    - Stanton Road, the junction to Lamledge Lane and the Hillcrest Shifnal School to the north and to the west joining with the Green Belt;
    - Upton Lane to the east; and
    - the combined effects of the eastern rail line, Shifnal Industrial Estate and the Hillcrest Shifnal School to the south with the rail line partially joining with the Green Belt.
  - Boundaries for Parcel P13a south of Stanton Road are formed by:
    - Stanton Road to the north joining with the Green Belt;
    - Upton lane to the west;

- The eastern rail line to the south joining with the Green Belt; and
- a pattern of field boundaries with hedgerows and field boundary trees form the boundary to the east joining with the Green Belt. The development, landscaping, structural planting and SuDS systems will strengthen this boundary where it joins with the Green Belt. This is addressed further in the section below on Compensatory Improvements to the Green Belt. It is expected that the Green Infrastructure for the development will extend into the Green Belt to connect with the woodland and trees lines extending from Ruckley Pools to create a countryside edge to the development and to strengthen the permanence of the eastern boundary treatments to the proposed employment development.
- Boundaries for Parcel P15 land south of A464 are formed by:
  - the A464 to the north of the land area partly joining with the Green Belt;
  - the proposed new urban edge alongside Beech House and Park Lane to the west and south; and
  - a ridgeline along the east of the land area joining with the Green belt. This will conceal the development from views in the Green Belt with structural planting and landscaping along the eastern edge of the development to enclose the urban area from the Green Belt. This will strengthen the boundary compared to that which currently exists around the safeguarded land at Beech House.
- Boundaries for Parcel P16 from Park Lane to the A4169 are formed by:
  - Park Lane and the existing urban edge of Shifnal to the east and north;
  - the A4169 to the west; and
  - a pattern of field boundaries with hedgerows and field boundary trees form the boundary to the south joining with the Green Belt. The development, landscaping and structural planting and green infrastructure affording access to the Green Belt and to Lodge Hill will strengthen this boundary where it joins with the Green Belt. This is addressed further in the section below on Compensatory Improvements to the Green Belt. It is expected that the Green Infrastructure for the development will enclose the development from the Green Belt with points of access into the countryside. This will connect with the footpath network around Lodge Hill to create a countryside edge to the development and to strengthen the permanence of the southern boundary treatments to the proposed urban extension to Shifnal.
- Boundaries for Parcel P17 from the A4169 to the western rail line are formed by:
  - the A4169 and the existing urban edge of Shifnal to the south and east;
  - the western rail line into Shifnal to the north and joining with the Green Belt to the north through the archway in the railway embankment; and
  - two open field boundaries form the boundary to the west joining with the Green Belt. The development, landscaping and structural planting and green infrastructure affording access to the Green Belt will strengthen this boundary where it joins with the Green Belt. This will be assisted to the north by the alignment of an internal distributor road along the development boundary on the approach to the archway through the railway embankment. This is addressed further in the section below on Compensatory Improvements to the Green Belt. It is expected that the Green Infrastructure for the

development will enclose the development from the Green Belt with points of access into the countryside. This will create a countryside edge to the development and strengthen the permanence of the western boundary treatments to the proposed urban extension to Shifnal.

### ***Compensatory Improvements to the Green Belt***

- 8.157. The NPPF states that *“Where it has been concluded that it is necessary to release Green Belt land for development... They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”*.
- 8.158. In recognition of this requirement, the proposed Site Guidelines for land proposed to be allocated from employment use at Land east of Shifnal Industrial Estate (SHF018b and SHF018d) includes measures to ensure:
- Site design and layout will respond to any identified landscape and visual effects and include all appropriate mitigation. Development will take full account of the need to enclose both the built form of the development and any off-site infrastructure works within a Green Infrastructure network, separating it from the Green Belt and landscape to the east of Shifnal.
  - The layout, height of buildings, use of Green Infrastructure with strong native tree planting to provide appropriate and substantial buffering, effective building design and materials will be used to appropriately manage impacts from the development including visual impacts, noise, dust, odour or other emissions arising from the employment uses.
  - Natural environment assets in proximity to the site and any priority habitats will be safeguarded and buffered.
  - Site design and layout will respect any local heritage assets and the potential for archaeological deposits which will be recorded. Green infrastructure will protect the settings for any identified heritage assets. Upton Lane forms an historic thoroughfare and the road route, or its historical presence will need to be conserved in the development.
  - Historic field patterns and hedgerows will be retained by Green Infrastructure within the grain of the development. Any removal of trees or hedgerows will be replaced as part of the structural planting for the employment area.
- 8.159. It also specifically includes the following guidelines:
- Careful consideration must be given to the creation of an effective boundary to the north, east and south of the development to strengthen the Green Belt boundary around the site. The rail line to the south will provide the principal Green Belt boundary in this location.
  - The SuDS infrastructure located to the south-east of the site will be designed and landscaped with a ‘parkland’ character as part of the Green Infrastructure providing public access as compensatory provision for releasing land from the Green Belt. This will form a strong boundary to the Green Belt along with the adjoining woodland.
- 8.160. Similarly, proposals for the safeguarding of land at Lodge Hill comprising two specific development parcels includes the following measures to ensure:
- Land between A464 (south) and Park Lane:

- focus Green Belt releases on sites close to public transport, being only 0.7km from Shifnal's railway station.
- maintain and strengthen existing features in the landscape such as topography, trees and hedgerows to define the development extent particularly to the east of Park Lane to screen the area proposed to be developed and to create a defensible boundary to the settlement that is reinforced by the change in topography.
- maintain and enhance the existing green infrastructure network and provides a series of proposals that respond to local landscape characteristics such as landform, field boundaries and tree belts.
- A new public footpath link could be provided from Park Lane, in order to create links with the proposed residential properties and the surrounding countryside, as well as providing additional routes into Shifnal.
- should sit below the ridge line in wider views from the south-east and west to minimise adverse effects on the surrounding open landscape.
- proposed open space to the south-west would also soften the appearance of development in views from Lodge Hill in the wider landscape to the west.
- Land between Park Lane and A4169 / the western rail line at Lodge Hill:
  - provides an opportunity to deliver a generous area of semi-natural new public open space along the Wesley Brook. This wetland corridor will be ecologically enhanced with species rich grasses and wetland habitats to enhance biodiversity. The new park will retain and enhance wildlife habitats and provide new footpaths for the benefit of all of Shifnal's residents.
  - providing sufficient additional land to deliver environmental and recreational improvements to the south, offsetting the loss of Green Belt with compensatory improvements to the environmental quality and accessibility of the remaining Green Belt adjoining the development.
  - provides pedestrian links will connect the existing public rights of way on the western and eastern sides of the site. The addition of an east-west footpath link will enhance the circular walk on public rights of way over Lodge Hill and its trig-point and back via the wooded lane on the western side of the Brook.
  - existing hedges defining the edge of the proposed safeguarded land can be reinforced with additional planting to create a strong buffer between the development and the redefined Green Belt.

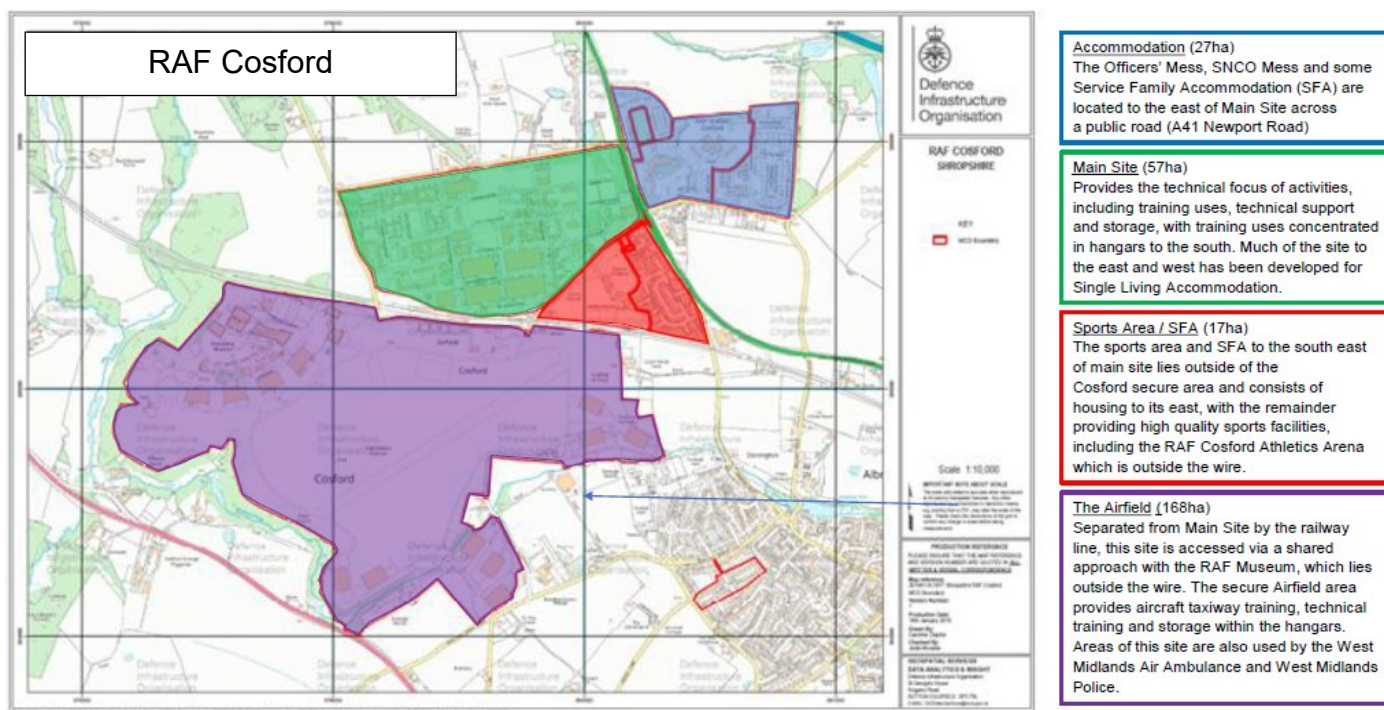
8.161. It is considered these measures will result in direct and indirect benefits to the environmental quality and accessibility of the remaining Green Belt.



## 9. RAF Cosford Strategic Site

### Introduction

- 9.1. RAF Cosford is a military base and airfield located wholly in the Green Belt, to the north-west of Albrighton. It is located within the M54 corridor, a key road and rail transport corridor, linking Shropshire to the West Midlands.
- 9.2. RAF Cosford opened in 1938 as a joint aircraft maintenance, storage and technical training unit and remains primarily a training unit to present day. The site also houses the renowned RAF Museum Cosford and hosts the Cosford Air Show. Areas of the site are also used by the West Midlands Air Ambulance Charity and West Midlands Police. These various uses are complementary and contribute to the strong character and success of the site.
- 9.3. The site currently consists of four broad areas, these are depicted on the Figure below:



- 9.4. RAF Cosford benefits from strong public transport links, with Cosford Railway Station (situated on the southern junction of the main site and sports area on the above figure) which is located on the Shrewsbury to Birmingham line, and several local bus stops located on the A41 (situated between the main site and accommodation area on the above figure) which are located on the Wolverhampton to Telford bus route.

### Development Aspirations

- 9.5. An extensive range of development aspirations have been identified for the RAF Cosford site; in summary these include:

### Ministry of Defence

- 9.6. RAF Cosford is currently a major part of the Defence College of Technical Training (DCTT). It is at the centre of the RAF's mission to deliver flexible, affordable, modern and effective technical training that meets the needs of the UK's Armed Forces now and into the future.

- 9.7. The MOD is undertaking a 'Defence Optimisation Programme' the aim of which is to create a smaller and significantly better estate that effectively supports our armed forces, and their role in protecting the security, independence and interests of the UK at home and abroad.
- 9.8. Due to its strategic location; existing built estate; the importance of the role it already plays in defence training; and the site's future potential, the disposal of RAF Cosford was discounted by the MOD at an early stage of this programme. As such, its future is more certain as it has been designated a 'receiver site' and will have an important role to play in the future optimisation of the MOD estate.
- 9.9. Cosford has since been referenced within the 'Better Defence Estate Strategy' as a centre of excellence for both UK and International Defence Training. The document also refers to the relocation of 4 School of Technical Training from MOD St Athan to RAF Cosford.
- 9.10. Furthermore, as part of its future strategy, the DCTT is reviewing capacity at RAF Cosford, linked to their aspiration to exploit opportunities for technical training consolidation. Whilst this work is ongoing, estimates from DCTT high-level strategic estate planning indicate that over the next 10+ years RAF Cosford would see in the region of an additional 1,500 people (staff and student population), although this could potentially increase further dependant on the outcome of the ongoing work.
- 9.11. Work is also being undertaken by the MOD to capture and consolidate information on the feasibility of other potential non-DCTT moves to RAF Cosford.
- 9.12. To support these various activities, there will be a need to intensify the use of existing facilities and undertake new development to provide additional necessary facilities. This will likely include additional training facilities, technical accommodation and domestic accommodation.

### **Whittle Engineering Academy**

- 9.13. Plans to form a specialist aviation academy, called the Whittle Engineering Academy, at RAF Cosford have recently been announced by the Aviation Skills Partnership in collaboration with Midlands Engine, the RAF, Air Cadets and Telford College. This is a major initiative to address demand for trained entrants to the Aviation Industry across all jobs, roles and skills in accordance with the Government's Green Paper Aviation 2050: The Future of UK Aviation. It also further elevates the importance of this location for UK aviation and potentially creates hundreds of new jobs at the site.

### **RAF Museum Cosford**

- 9.14. The RAF Museum Cosford is dedicated to the history of aviation and in particular the RAF. As such the museum provides an important record of our aviation and RAF history, whilst also representing a nationally significant visitor attraction. The RAF Museum Cosford also hosts the ever popular Cosford Air Show.
- 9.15. The RAF Museum Cosford have announced ambitious plans for a £40 million investment programme over 10 years to intensify and expand the museum site.

### **Midlands Air Ambulance Charity**

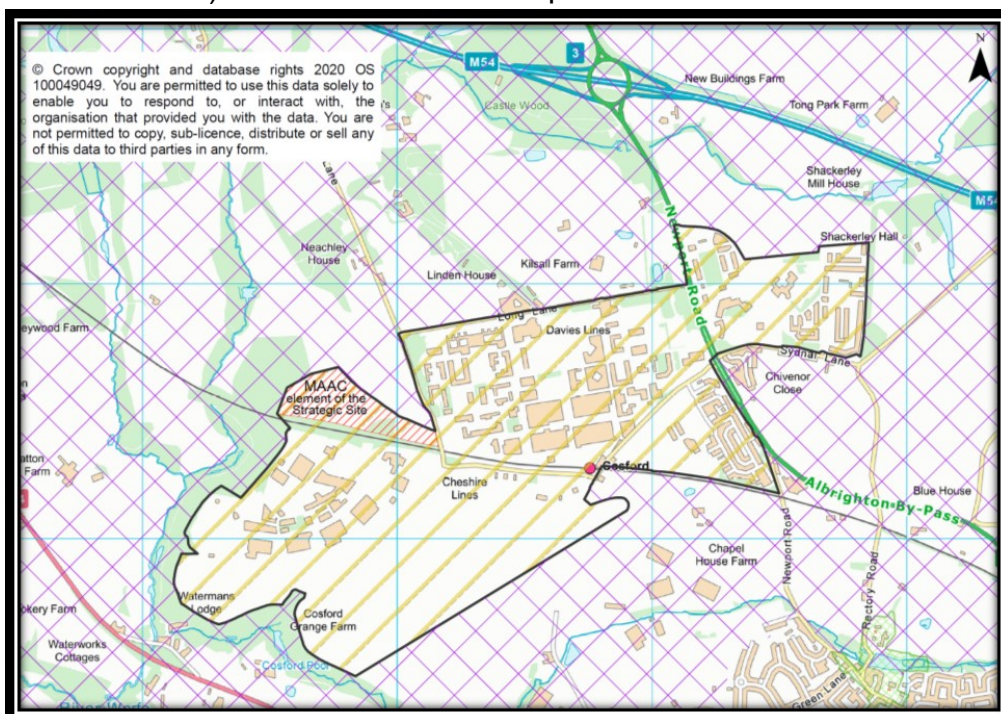
- 9.16. The Midlands Air Ambulance Charity (MAAC) currently operates and funds three air ambulances covering six Midlands counties including Gloucestershire, Herefordshire, Shropshire, Staffordshire, Worcestershire and the West Midlands. The area is home to around 6 million people and since 1991, the Charity have undertaken over 50,000 missions, making them one of the busiest ambulance services in the UK.



- 9.17. The charity responds to some of the most traumatic incidents including cardiac arrests, road traffic collisions and sports injuries. The aircraft reaches remote locations to attend to patients unreachable by land ambulance. The air ambulance is an essential and emergency public service.
- 9.18. The MAAC require a new headquarters to future proof the region's essential helicopter-led emergency services and accommodate the projected 4% annual increase in demand for the service. The co-location of facilities at this new headquarters will enable the charity to optimise all aspects of its operations, including medical, training and charitable ancillary services.
- 9.19. The new MAAC headquarters will act as the hub for operations, supplemented by a series of regional sites across the six Counties of Gloucestershire, Herefordshire, Shropshire, Staffordshire, the West Midlands and Worcestershire. When combined, the service network will maximize the efficiency of the charity and increase capacity via extended operating schedules. Alongside providing enhanced service provision, the new MAAC headquarters will support the sustainability of the charity, for example by increasing potential for community engagement and events, whilst providing a high-quality modern training facility and permanent office accommodation.

### ***Proposed Green Belt Release***

- 9.20. Having considered the role of RAF Cosford, the various complementary uses that occur on the site and the identified development aspirations, it is considered appropriate to propose the release of an area extending to some 214.2 ha from the Green Belt, in order to facilitate delivery of these stated development aspirations.
- 9.21. The area identified for release from the Green Belt consists of the majority of the existing RAF Cosford Site, with the exception of the element south-east of the airfield, which is considered important to retain within the Green Belt in order to maintain the gap between RAF Cosford and the settlement of Albrighton. A further area of land to the north-west of the existing site is also proposed for release from the Green Belt, specifically to facilitate the formation of a new headquarters for the MAAC. The extent of the area proposed for release (and the area beyond the extent of the current site) is illustrated on the map below:



9.22. Within the remainder of this document, the total area proposed for release from the Green Belt is referred to as the RAF Cosford Strategic Site.

### **Green Belt Assessment and Review**

9.23. To inform the Shropshire Local Plan Review, a two-stage assessment of the Green Belt in Shropshire has been undertaken by specialist consultants and published by Shropshire Council.

9.24. The Green Belt Assessment (Part 1) considers the performance of Green Belt across Shropshire by dividing it into parcels of land and assessing each parcel (providing them a rating of no contribution; weak; moderate or strong) against the five nationally defined purposes that Green Belt serve, these are to:

1. check the unrestricted sprawl of large built-up areas;
2. prevent neighbouring towns merging into one another;
3. assist in safeguarding the countryside from encroachment;
4. preserve the setting and special character of historic towns; and
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

9.25. The Green Belt Review (Part 2) is focused on considering the potential harm to the Green Belt resulting from the release of parcels of land and areas of opportunity around identified settlements and strategic geographical locations, if they were identified to provide for development needs and support a sustainable pattern of future growth in the County to 2038 and beyond.

9.26. Within the Green Belt Assessment and Review (Part 1 and Part 2), the existing RAF Cosford Site is considered as part of three parcels of land, specifically parcels P28 (the main site and sports area), P30 (accommodation) and P40 (the airfield). The MAAC element of the RAF Cosford Strategic Site is considered as part of parcel P29.

9.27. The Green Belt Assessment (Part 1) of the performance of these parcels against Green Belt purposes 1a, 1b, 2, 3, & 4 is summarised in the table below.

<b>Parcel Reference</b>	<b>Purpose 1a</b>	<b>Purpose 1b</b>	<b>Purpose 2</b>	<b>Purpose 3</b>	<b>Purpose 4</b>
<b>P28</b>	No contribution	No contribution	Weak	Weak	No contribution
<b>P29</b>	No contribution	No contribution	Moderate	Moderate	Weak
<b>P30</b>	No contribution	No contribution	Moderate	Moderate	No contribution
<b>P40</b>	No contribution	No contribution	Moderate	Weak	Weak

*Please Note: Purpose 5 is identified as important across all parcels, but the study considers that assessment of performance of individual parcels against this purpose is not possible in a meaningful way.*

9.28. This Green Belt Review (Part 2) indicates the harm to the Green Belt resulting from the release of the parcels which contain elements of the RAF Cosford Strategic Site, this can be summarised as follows:

<b>Parcel Reference</b>	<b>Harm to the Green Belt Resulting from Release</b>
<b>P28</b>	Low Harm
<b>P29</b>	Moderate-High Harm
<b>P30</b>	Low-Moderate Harm
<b>P40</b>	Low-Moderate Harm

9.29. Within the Green Belt Review (Part 2) an opportunity area (Co-1b) containing the majority of the existing RAF Cosford site (excluding a small portion of the airfield

and excluding the MAAC element of the RAF Cosford Strategic Site) was also reviewed and identified as having low-moderate harm to the Green Belt if released.

- 9.30. Within the Green Belt Review (Part 2) an opportunity area (Co-1b) containing the main site and sports area of the existing RAF Cosford and the parcel which contains the MAAC element of the site was also reviewed and identified as having moderate-high harm to the Green Belt if released.

### ***Other Planning Considerations***

- 9.31. To inform the identification of proposed site allocations within the Local Plan Review, Shropshire Council has undertaken a comprehensive Site Assessment process. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of vision, objectives and policies and site allocations.
- 9.32. This Site Assessment process included consideration and identification of potential Strategic Sites, including the RAF Cosford Strategic Site. Within this assessment it was concluded that the site is suitable, available, achievable and viable (subject to demonstrating exceptional circumstances for the release of the land from the Green Belt).
- 9.33. Key considerations within the site assessment process undertaken for the RAF Cosford Strategic Site included:
- The RAF Cosford Strategic Site is located on the M54/A5 strategic corridor. The opportunity associated with this corridor is recognised within the Economic Growth Strategy for Shropshire and the M54 corridor study.
  - Significant development aspirations have been identified for the site (see above).
  - The majority of the site is located within flood zone 1.
  - The site is located within a source protection zone, mainly zone 3, however small parts to the west of the site are located within zone 2.
  - The site is located within the Green Belt (see the above summary of the performance of the parcels containing the site, against the national Green Belt purposes and the harm to the Green Belt that would result from their release).
  - The majority of existing RAF Cosford Site (including the entirety of the existing site proposed for release from the Green Belt as part of the RAF Cosford Strategic Site) has low landscape and visual sensitivity to housing and employment development. The MAAC element of the RAF Cosford Strategic Site has medium-high landscape sensitivity to housing and employment and medium visual sensitivity to housing and employment.
  - Much of the existing RAF Cosford site is brownfield. It is noted that the MAAC element of the RAF Cosford Strategic site is greenfield.
  - The site benefits from good highway links, although Highways England views will be required regarding the relationship between the site and Junction 3 of the M54 / the M54 itself.
  - An environmental network crosses and is immediately adjacent to the site.
  - A Habitats Regulations Assessment will be required for the site.
  - The site contains hedgerows and mature trees/wooded corridors. It also contains protected species (Great Crested Newts) and may contain priority habitats.
  - The site contains listed buildings and non-designated heritage assets including expansion period airfield and military buildings.

- The site is likely to contain contaminated land associated with past military uses.
- Potential noise associated with the A41, railway and airfield.
- Possible odour sources in proximity to the site e.g. sewage works.

### **Assessment of All Other Reasonable Options**

9.34. Paragraph 137 of the NPPF states:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.*

### **Brownfield and Under-Utilised Land**

9.35. Much of the existing RAF Cosford Site is brownfield land, as such its identification as a Strategic Site will allow for the continued effective use of a brownfield site.

9.36. It is acknowledged that there are greenfield elements of the site. However, it is not considered that the identified development aspirations can be achieved on alternative brownfield (or greenfield) locations outside the Green Belt. These development aspirations are very much linked to this site, due to its location and the extensive existing built form and infrastructure that already exist on the site.

9.37. Further assessment of alternative options is provided under the heading: Alternative Options.

### **Optimising Density**

9.38. It is not considered that the identified development aspirations can be achieved by optimising the density of development outside of the Green Belt. These development aspirations are very much linked to this site, due to its location and the extensive existing built form and infrastructure that already exist on the site.

9.39. However, it should be noted that identification of the RAF Cosford Strategic Site will allow for appropriate intensification of development.

9.40. Further assessment of alternative options is provided under the heading: Alternative Options.

### **Accommodation of Development in Neighbouring Local Authorities**

9.41. It is not considered that the identified development aspirations can be achieved in neighbouring Local Authorities. These development aspirations are very much linked to this site, due to its location and the extensive existing built form and infrastructure that already exist on the site.



- 9.42. Proactive duty to cooperate discussions have been ongoing throughout the Local Plan Review process, as documented within the Section 3: Policy Context of this report.
- 9.43. Ultimately, it is not considered that the identified development aspirations can be achieved by optimising the density of development outside of the Green Belt. These development aspirations are very much linked to this site, due to its location and the extensive existing built form and infrastructure that already exist on the site.
- 9.44. Further assessment of alternative options is provided under the heading: Alternative Options.

## **Alternative Options**

- 9.45. Alternatives to the proposed release of the RAF Cosford Strategic Site were considered in two stages, reflecting the two components of the RAF Cosford Strategic Site, specifically:
  - a. Alternatives to releasing elements of the existing RAF Cosford site from the Green Belt as part of the RAF Cosford Strategic Site.
  - b. Alternatives to the release of the area of land identified specifically identified for the MAAC from the Green Belt as part of the RAF Cosford Strategic Site.

### **Alternatives: Release of elements of the existing RAF Cosford site**

- 9.46. RAF Cosford is a well-established site with extensive built form that is wholly located within and surrounded by the Green Belt. Given the extent of existing facilities on the site and the findings of the extensive 'Defence Optimisation Programme' which concluded that RAF Cosford should be designated a 'receiver site' and will have an important role to play in the future optimisation of the MOD estate, due to its strategic location; existing built estate; the importance of the role it already plays in defence training; and the site's future potential, there are no alternative locations where the identified development aspirations can be achieved outside of the Green Belt.
- 9.47. As such the only realistic alternatives available to the release of elements of the existing RAF Cosford site are:
  - a. Not release any land from the Green Belt;
  - b. Release a smaller component of the existing RAF Cosford site from the Green Belt; or
  - c. Release a larger component of the existing RAF Cosford site from the Green Belt.

### ***Not release any land from the Green Belt.***

- 9.48. RAF Cosford is identified as a major developed site within the Green Belt in the current Local Plan. However, even with this status, most development proposals (apart from the specific exceptions identified within paragraphs 145 and 146 of the NPPF) would be required to demonstrate 'very special circumstances' in accordance with paragraphs 143 and 144 of the NPPF, during the Planning Application process.
- 9.49. Specifically, paragraph 143 of the NPPF states "*Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*", whilst paragraph 144 of the NPPF states "*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason*

*of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.*

- 9.50. As such it is considered that this alternative would at best significantly reduce and at worst result in an inability to achieve the identified development aspirations for the site. Specifically, it would provide no certainty or confidence to relevant parties about the sites development potential and would not effectively facilitate the various identified development aspirations for the site, including construction of additional training facilities, technical accommodation and domestic accommodation for MOD use; additional buildings at RAF Museum Cosford; and formation of the Whittle Academy.

***Release a smaller component of the existing RAF Cosford site from the Green Belt.***

- 9.51. It is considered that any reduction to the site area would result in a proportionate reduction to the ability to achieve the identified development aspirations at RAF Cosford. Furthermore, dependent on the extent of any reductions to the area of the site they could ultimately undermine the ability to achieve the identified development aspirations.
- 9.52. The extent of the existing RAF Cosford site proposed for release from the Green Belt reflects the extent of much of the existing built form and aligns with the most obvious defensible boundaries, consisting of: the extent of built form, roads, the runway, the railway line and the brook and its associated woodland. It also provides sufficient flexibility to meet the short- and medium-term development needs of the occupiers of the site and also provide long-term future operational flexibility, including reflecting security requirements.
- 9.53. It is considered that this approach is in line with national policy. Specifically, paragraph 139 of the NPPF includes the following specific requirements for Plans when defining new Green Belt boundaries:
- “...b) not include land which it is unnecessary to keep permanently open;...  
e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and  
f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.*
- 9.54. It is considered the release of a smaller component of the RAF Cosford site would less robustly reflect these requirements.

***Release a larger component of the existing RAF Cosford site from the Green Belt.***

- 9.55. To allow a larger area of the existing RAF Cosford site were to be proposed for release from the Green Belt, any release would need to include land to the south-east of the runway. It is considered that this land performs an important role in creating separation between the RAF Cosford Site and Albrighton, whilst this is not specifically a Green Belt factor it is a planning consideration. As such this would represent a less preferable option.

**Alternatives: Release of the MAAC site**

- 9.56. The MAAC have undertaken a comprehensive search to identify the most appropriate location for their new headquarters. Shropshire Council have considered the assessment exercise undertaken and concluded that there are no non-Green Belt alternatives or indeed any more suitable Green Belt alternatives for



the location of the MAAC than the element of the RAF Cosford Strategic Site specifically identified for this purpose.

9.57. The MAAC site assessment exercise can be summarised as follows:

9.58. A two-stage assessment process was undertaken. Initially they identified an appropriate 'area of search' and then assessed sites within and in proximity of this area of search.

*Stage 1: 'Area of Search'*

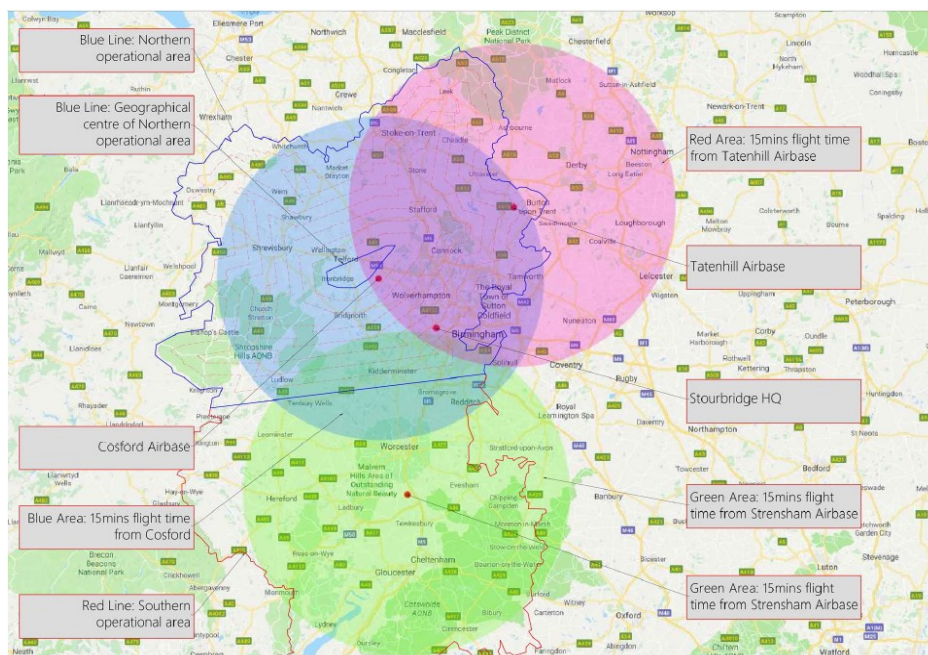
9.59. This 'area of search' was informed by two key factors, these were minimising flight time and the other operational requirements of the MAAC.

9.60. The MAAC overriding objective in the siting of their new facility is to allow for improved patient care and a critical aspect of ensuring the best possible clinical outcomes for patients is reducing the length of time that a patient must wait for care.

9.61. The new MAAC headquarters will combine the air base functions of Tatenhill and RAF Cosford with the headquarters function currently located in Stourbridge to form a co-located facility to serve the northern element of the MAAC operating area. The southern element of the MAAC operating area will continue to be served by the existing base at Strensham.

9.62. The MAAC used two main methods to consider the most appropriate location for a headquarters covering the northern element of the MAAC operating area, in summary these involved:

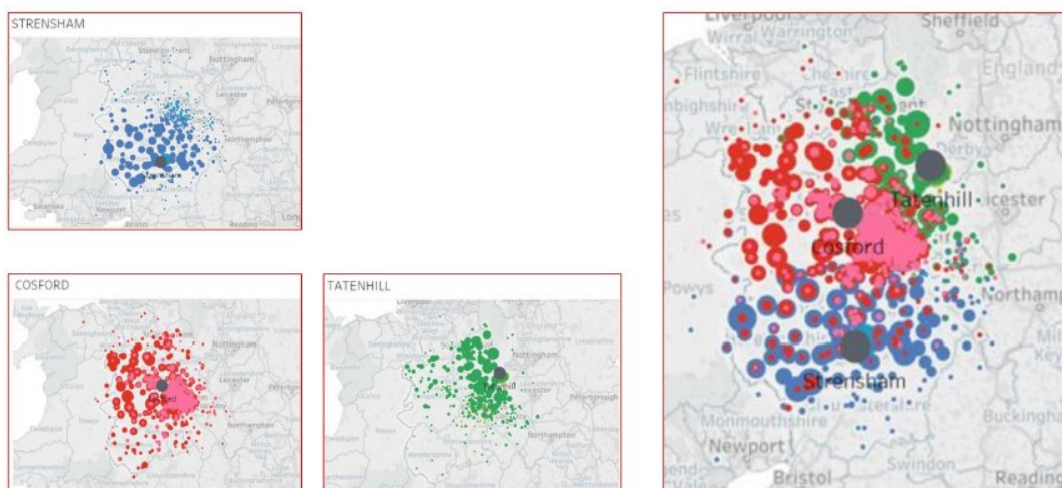
1. **Identification of the geographic central location.** The MAAC identified the geographic central location of the northern element of their operational area, illustrated on the diagram below. From this location a helicopter can cover the greatest area within the operational zone in the least time. It should be noted however, that this coverage does not reflect any bias towards the actual distribution of previous (and likely future) incidents the MAAC is able to and has been tasked to attend, which are principally in more rural or remote areas.



*The 'range rings' illustrated on the figure above represent a 15-minute response time from the relevant airbase. It is apparent that Strensham (shown in green) is well situated in the centre of the southern element of the operating area. It is also apparent that Cosford (shown in blue) is similarly well situated in the centre of the northern element of the operating area. Tatenhill, located on the extreme eastern boundary of the operating area, has a range ring covering a large land area outside that to which the helicopter can be tasked.*

2. **Determining the most appropriate location by mapping previous incidents – which are likely to represent an indication of future incidents.** The MAAC mapped previous incidents within the northern operational area. Previous incidents map the frequency, location, tasking and ability of the helicopter to attend. Analysis of previous incidents reveals the geographical centre of the incidents attended and is not influenced by population but real demand.

The maps below summarise the typical distribution of tasks to which the helicopter was dispatched (it is apparent that Cosford is a very busy base and that most of Tatenhill's tasking is to the west of the airbase).



3. The central location by population was also considered, however the MAAC concluded that this was probably an inappropriate methodology as population is weighted towards urban areas where other modes of delivering emergency care might be more effective and even if major towns and cities are omitted it is likely that the results would not be useful.

9.63. In addition to minimising flight times to incidents, the other operational requirements and objectives of the MAAC were also paramount in their assessment to identify an appropriate location for their new headquarters - any location must not inhibit operations. Such factors considered can be summarised as follows:

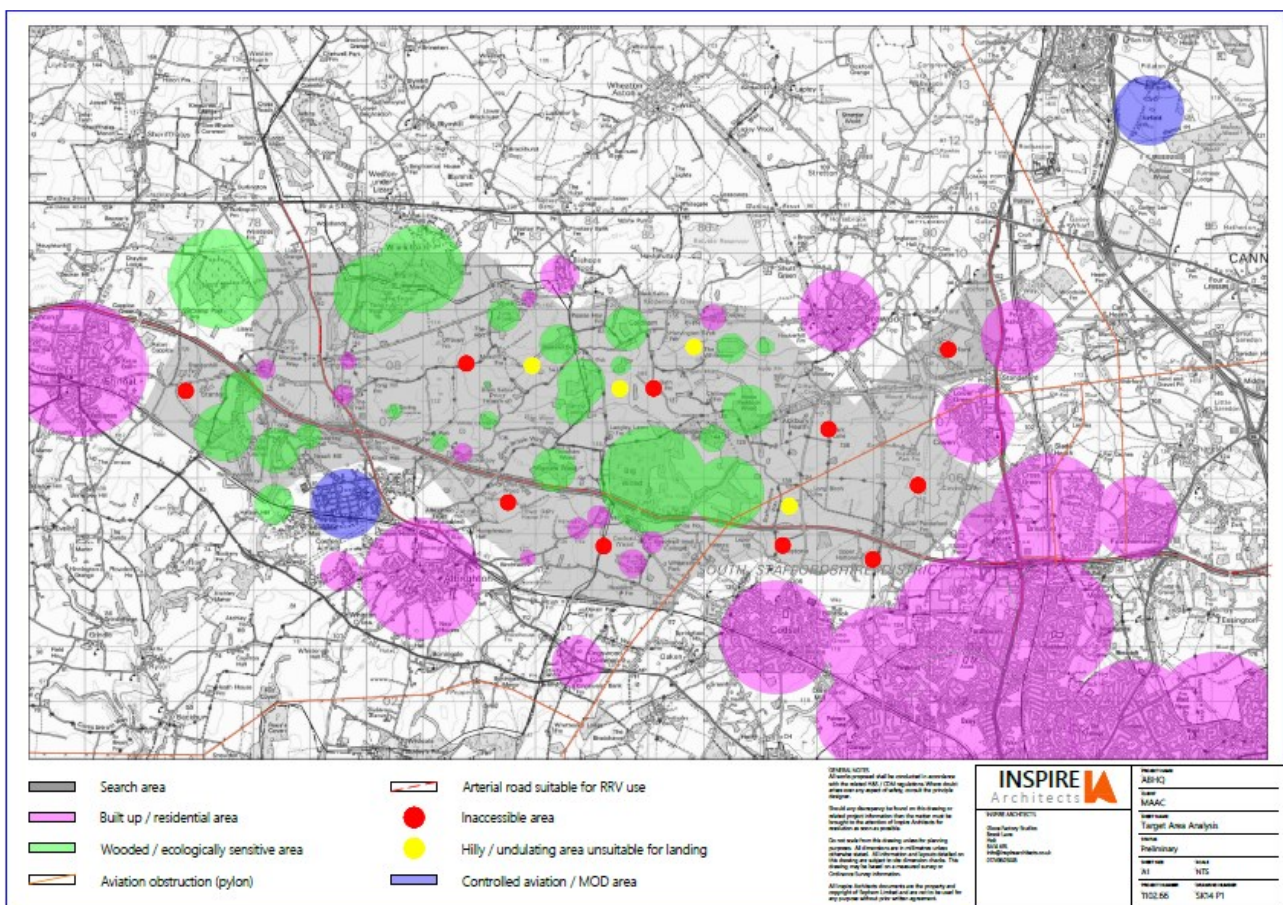
- Sufficient site size to accommodate all operational requirements: The site needs to accommodate the new headquarters building which will combine two of the existing airbases, integrate office accommodation and other ancillary services from the current headquarters, allow space to maximise clinical efficiency, and space for high-quality modern training facilities and also provide space for fundraising facilities.
- Restrictions on flying time or noise: Residential areas and other areas that may prove sensitive to noise including certain livestock farms, equine facilities, theatres, cinemas etc, need to be avoided.
- Topography: A flat take-off and landing area is required.
- Built and natural environment: To ensure operations are not unduly constrained by and do not unduly impact on these assets.
- Road access and other transport links: Effective road access requirements are primarily driven by the need for critical care paramedic vehicle / rapid response vehicles (CCP / RRV) to gain access to the major road network. Effective road



and in particular public transport links are also required for staff and those attending fundraising events.

- Air space/routes: The air space immediately around the new headquarters must be sufficiently free from other users to allow unfettered operation and free from obstructions / flight hazards. The suitability of any potential frequently used approach and departure routes in the wider area is also important to ensure a similar lack of obstruction and to mitigate the acoustic effect of the helicopter to adjoining land.
- Proximity to existing facilities: The MAAC would ideally not wish to cause any loss of employment, or difficulty to its staff through relocating the new headquarters to a distant location distant from existing facilities.

9.64. It is acknowledged that some of these factors are 'site specific' in addition to informing the 'area of search'. After consideration of these issues, the MAAC identified an area of search, summarised on the map below:



9.65. It is apparent that the 'area of search' identified through this process is located within the Green Belt, as is much of the land in immediate proximity of the 'area of search'.

### Stage 2: 'Site Assessment'

9.66. Following the identification of the 'area of search', the MAAC undertook a comprehensive site assessment within and in proximity of the 'area of search'.

9.67. They started by focusing on existing airfields, within and in proximity of the 'area of search', however no sites were identified as suitable, available and achievable (including viable). It should be noted that consideration at this stage was given to the existing RAF Cosford site (which is itself located within the Green Belt and contains one of the existing MAAC airbases). However, the scale of the current

MAAC airbase site and any other potential sites within the existing RAF Cosford site and the constraints present due to the fact that it forms part of an active military base, meant that it was ultimately considered unsuitable for the formation of the new MAAC headquarters.

- 9.68. The MAAC then considered other brownfield sites and developed sites with complementary uses within the 'area of search' and subsequently within proximity of the 'area of search'. However, it was ultimately concluded that no sites were suitable, available and achievable (including viable).
- 9.69. The MAAC then considered the availability of greenfield sites within and subsequently in proximity of the 'area of search'. This ultimately resulted in the identification of the Neachley Lane site, which represents the MAAC element of the RAF Cosford Strategic Site. This site was identified as it is considered to be suitable, available and achievable (including viable). Furthermore, from an operational perspective the site is:
- Of a sufficient size to accommodate the development and free from overhead obstructions.
  - Exceptionally well placed for air ambulance activity in the Northern part of the Charity's operating area.
  - Sufficiently flat to allow for a full final approach and take off area as well as space for approach routes.
  - The airspace / routes surrounding the site are sufficiently free to allow for the unfettered operation of the helicopters.
  - It has a pre-existing controlled and understood air space through which the Charity is used to flying.
  - It is away from major residential areas.
  - The response time for rapid response vehicles to the road network is appropriate. The site is also very well connected to major arterial routes in the centre of the Northern operating area.
  - It has good access to public transport links for staff and visitors.
  - The site offers the benefits of co-location with other users of the RAF Cosford Strategic Site.

### *Conclusion*

- 9.70. It is apparent that the factors considered by the MAAC are consistent with the approach specified within paragraphs 137 and 138 of the NPPF. Paragraph 137 of the NPPF in summary states *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development"*. This includes consideration of making as much use as possible of *"suitable brownfield sites and underutilised land"*, *"optimising the density of development"*, and *"discussions with neighbouring authorities about whether they could accommodate some of the identified need for development"*.
- 9.71. Paragraph 138 of the NPPF includes the following *"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport."*

- 9.72. As a result of this comprehensive site assessment process undertaken by the MAAC, it is considered that there are no alternative sites which have not been comprehensively considered by the MAAC.
- 9.73. As such, the only alternative to proposing the MAAC site for release from the Green Belt as part of the RAF Cosford Strategic Site, would be to identify no site for the MAAC headquarters. However, Shropshire Council does not consider that this represents a reasonable alternative as it recognises:
- The unique nature of the identified need for the proposal development;
  - The undeniable benefits of the proposal to the long-term sustainability of the essential emergency service; and
  - The significant benefits of locating the proposal at the subject site, including those resulting from the co-location of the facility with RAF Cosford.

### **Exceptional Circumstances**

- 9.74. Paragraph 136 of the NPPF states:

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans”.*

- 9.75. Further, Paragraphs 138 of the NPPF states:

*“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.*

- 9.76. It is considered that there are a number of exceptional circumstances which support the proposed release of the RAF Cosford Strategic Site from the Green Belt. These can be summarised as follows:

### **The Exceptional Nature of the Development**

- 9.77. As summarised under the RAF Cosford Strategic Site: Development Aspirations section of this statement, a number of unique development aspirations have been identified for the RAF Cosford Strategic Site. In summary, these development aspirations include enhancement of RAF Cosford’s role as a centre of excellence for both UK and International Defence Training, any opportunities to co-locate other MOD services, plans to form a specialist aviation academy, plans for the expansion of the RAF Museum Cosford and plans to form a new headquarters for the MAAC.



- 9.78. These development aspirations are considered locally, regionally and nationally significant opportunities. Furthermore, as demonstrated within the RAF Cosford Strategic Site: Assessment of All Other Reasonable Options section of this statement, these opportunities are unique to this site.
- 9.79. As such the unique and exceptional nature of the development is considered to represent an exceptional circumstance in and of itself.

### **Sustainable Site – Now and in the Future**

- 9.80. RAF Cosford is a well-established site with extensive built form that is wholly located within and surrounded by the Green Belt.
- 9.81. Whilst RAF Cosford is primarily a military facility it also houses the renowned RAF Museum Cosford and areas of the site are also used by the West Midlands Air Ambulance Charity and West Midlands Police.
- 9.82. It is considered that there are significant benefits resulting from the co-location of these various and complementary uses on the site and that supporting each of their development aspirations will ensure they remain on the site, resulting in a sustainable pattern of development, undeniable benefits to the long-term sustainability of these organisations, crucially the site itself and the surrounding area.
- 9.83. Furthermore the site benefits from strong public transport links, with Cosford Railway Station (situated on the southern junction of the main site and sports area on the above figure) which is located on the Shrewsbury to Birmingham line, and several local bus stops located on the A41 (situated between the main site and accommodation area on the above figure) which are located on the Wolverhampton to Telford bus route. As such it is also considered that the site is in a sustainable location for development.
- 9.84. This is considered to be consistent with the paragraph 138 of the NPPF which states *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.... Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport”*.

### **Contribution to the Aspirations of the Shropshire Local Plan and Economic Growth Strategy for Shropshire (2017-2021)**

- 9.85. Removing the RAF Cosford Strategic Site from the Green Belt will enable the numerous and complementary development aspirations identified for the site to occur. In turn, achievement of these development aspirations will complement and facilitate delivery of the Economic Growth Strategy for Shropshire (2017-2021) and the objectives of the Shropshire Local Plan.
- 9.86. Specifically, the Economic Growth Strategy for Shropshire (2017-2021) seeks to prioritise investment in strategic locations and growth zones along strategic corridors. It also identifies a number of key growth sectors for the Shropshire economy, including ‘advanced manufacturing including engineering, agri-food and agri-tech’.
- 9.87. It is also noted that a key principle within the vision for the Marches LEP as identified within the SEP (2019) is for the sub-region to be *“A global centre of excellence in advanced manufacturing specifically automotive, cyber security, and*

*the next phase of technology development in agriculture, environment and food production.”*

- 9.88. The M54 corridor upon which RAF Cosford Strategic Site is located is one such strategic corridor. Emerging proposals for the RAF Cosford Strategic Site including enhancement of its role as a centre of excellence for both UK and International Defence Training, any opportunities to co-locate other MOD services, plans to form a specialist aviation academy, plans for the expansion of the RAF Museum Cosford and plans to form a new headquarters for the MAAC are locally, regionally and nationally significant and as such represent a significant opportunity to promote the M54 corridor and perhaps other strategic corridors in Shropshire.
- 9.89. Furthermore, although the identified development aspirations for the RAF Cosford Strategic Site are for military and charity purposes, they are directly related to the key growth sector ‘advanced manufacturing including engineering, agri-food and agri-tech’ and would provide education opportunities, access to a skilled workforce, opportunities for the co-location of supply chain and opportunities for complementary employment offer which would all contribute to the achievement of the economic growth strategy.
- 9.90. These same factors would also contribute to the achievement of the Shropshire Local Plan as:
- The strategic approach which underpins the Shropshire Local Plan (captured within Policy SP2. Strategic Approach) seeks to ensure that Shropshire will flourish, accommodating investment and new development that contributes to meeting needs and making its settlements more sustainable.
  - The strategic approach also includes an ‘urban focus’ by which the majority of new development is directed towards urban areas, including the RAF Cosford Strategic Site, which “will form a centre of excellence for aviation and engineering, meet military personnel accommodation needs and support the aspirations of the Ministry of Defence, the RAF Museum and the Midlands Air Ambulance Charity”.
  - Policy SP12. Shropshire Economic Growth Strategy states that “Shropshire will be the best place to do business and invest. The County will promote its economic potential and increase its productivity by using the benefits of its local talent, business expertise, improving connectivity, high-quality assets and special environment. The strategy to achieve these objectives is to positively support enterprise and to develop and diversify the local economy, delivering sustainable economic growth and investment in our settlements, strategic corridors and appropriate rural locations”.

## **Green Belt Performance**

- 9.91. As summarised within the RAF Cosford Strategic Site: Green Belt Assessment and Review section of this statement, the Green Belt proposed for release at the RAF Cosford Strategic Site:
- Makes at most a moderate contribution to the nationally identified purposes for Green Belt. The assessment of the performance of parcels against purpose 5 is not possible in a meaningful way.
  - Would result in at most moderate-high harm to the Green Belt, although much of the site would result in low harm or low-moderate harm.

9.92. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.

### **Site Boundaries**

9.93. Paragraph 139 of the NPPF states:

*“When defining Green Belt boundaries, plans should:*

*a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*

*b) not include land which it is unnecessary to keep permanently open;*

*c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*

*d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*

*e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*

*f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

9.94. As documented within the RAF Cosford Strategic Site: Exceptional Circumstances section of this statement, it is considered that removing the RAF Cosford Strategic Site from the Green Belt in order to facilitate the various development aspirations identified for the site is consistent with and will directly contribute to the development plans strategy for meeting identified requirements for sustainable development.

9.95. The RAF Cosford Strategic Site includes much of the existing RAF Cosford Site, elements of which perform only a weak contribution towards any of the Green Belt purposes (and the highest contribution of parcels containing the RAF Cosford Strategic Site is moderate). As such it could certainly be argued that elements of the site are unnecessary to be kept permanently open.

9.96. The extent of release proposed within the RAF Cosford Strategic site is considered sufficient to meet the short- and medium-term development needs of the occupiers of the site and also provide long-term future operational flexibility, including reflecting security requirements. This is in line with national policy which seeks to ensure that changes to Green Belt boundaries endure for the longer term beyond the plan period.

9.97. The extent of the release proposed at the RAF Cosford Strategic Site aligns as best as practicable with strong defensible Green Belt boundaries. Specifically, identified boundaries are in the majority clearly formed by various physical features including:

- The extent of existing built form and associated substantial planting/hedgerows;
- Roads;
- The Railway Line;
- A brook and associated substantial woodland; and
- The runway.

9.98. The one location where a boundary is not defined by a clear physical feature is to the north of the element of the RAF Cosford Strategic site specifically proposed for

the MAAC. However, in recognition of this, proposed site guidelines include: “the northern boundary of this component of the site will be subject to substantial appropriate boundary landscaping in order to create a defensible Green Belt boundary”.

### ***Compensatory Improvements to the Green Belt***

- 9.99. The NPPF states that *“Where it has been concluded that it is necessary to release Green Belt land for development... They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”*.
- 9.100. In recognition of this requirement, the proposed Policy S21 Strategic Site: RAF Cosford includes measures to ensure:
- The high-quality design of development;
  - Appropriate treatment of site boundaries (particularly that located to the north of the MAAC element of the RAF Cosford Strategic Site);
  - Appropriate pedestrian and cycle links are provided through the site (taking into account that public access is restricted within parts of the site);
  - Maintenance of appropriate and proportional compensatory provision of open space;
  - Appropriate green infrastructure provision including enhancement of key green infrastructure corridors and networks within and in proximity of the site; and
  - Retention and buffering of natural and historic environment assets.
- 9.101. It also specifically includes the following requirement: *“Opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals as set out in Green Belt Policy SP11. Compensatory provision to the Green Belt will include appropriate additional planting to improve visual amenity and biodiversity and creation of linkages to green infrastructure networks and corridors beyond the site.”*
- 9.102. It is considered that these measures will result in direct and indirect benefits to the environmental quality and accessibility of the remaining Green Belt.

# Appendices



Shropshire Council  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire SY2 6ND

Date: 27<sup>th</sup> February 2020

Dear

### **Shropshire Local Plan Review - Duty to Co-operate meeting development need**

As you are aware from ongoing duty to cooperate liaison and previous consultations which began in early 2017, Shropshire Council are reviewing their adopted Local Plan. There are a number of drivers for this review, including changes to national policy and guidance; the need to regularly review Local Plans; the opportunity to capitalise on potential economic opportunities; and a commitment made during examination of the SAMDev Plan (which forms part of the current Local Plan) to undertake an early review of the Local Plan, including a detailed review of the Green Belt boundary.

The intention is that following the completion of the ongoing review, the current Local Plan documents will be replaced by a single Local Plan document (supported by any formal Neighbourhood Plans) which will include all strategic and detailed policies, together with all site allocations for a Plan period which it is proposed will now extend to 2038.

### **Green Belt**

The Shropshire Green Belt is part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry. Within Shropshire, the Green Belt is located south of the A5 and east of the River Severn.

Whilst only part of Shropshire is covered by Green Belt designation, it does impact on the ability to achieve sustainable patterns of development and constrains the ability to meet local needs and the growth potential of settlements in east Shropshire, including Bridgnorth, Albrighton, Shifnal and Alveley, as well as large developed sites such as RAF Cosford.

Furthermore, as already noted the need for a Green Belt review was specifically identified in the SAMDev Plan Inspector's report. As such, to inform the review of the Local Plan and assist the further evaluation of strategic options for sustainable development in Shropshire, a Green Belt Assessment and Review have been undertaken and published on our website.



### Local Plan Review

The first stage of consultation to inform the Local Plan Review focused on Issues and Strategic Options (January 2017 – March 2017). In particular, this consultation considered the scale and distribution of housing and employment development across Shropshire.

The second stage of consultation to inform the Local Plan Review represented the first of a series of Preferred Options consultations (October 2017 – December 2017). It identified the preferred scale and distribution of development, specifically indicating a preference for an urban focused strategy to deliver 28,750 dwellings with balanced employment growth of 300 ha of employment development (levels of growth were based on a plan period to 2036, this has now been extended to 2038).

The third and fourth stages of consultation to inform the Local Plan Review represented further stages of Preferred Options and focused on Preferred Sites (November 2018 – February 2019) and Strategic Sites (July 2019 – September 2019). These consultations sought to test preferred development proposals associated with existing established settlements and potential strategic sites not associated with existing settlements, respectively.

In summary, the Preferred Options consultations proposed that most of the additional housing and employment development required would be distributed to locations outside the Green Belt. However, it was recognised that there remained a need to ensure:

- Sustainable patterns of development;
- The long-term sustainability and delivery of the development needs of specific settlements; and
- Recognition of the strategic economic importance of the east of the county, particularly the M54 corridor.

Reflecting these important factors, growth was also proposed within settlements inset and on the edge of the Green Belt. Specifically growth was proposed in the settlements of Bridgnorth, Albrighton, Shifnal and Alveley. We also consulted on growth proposals at two strategic sites within the Green Belt.

Bridgnorth, as Shropshire's third largest town, is identified as a Principal Centre which will contribute towards the strategic growth objectives in the east of the County. There are specific planning and structural issues in Bridgnorth including: significant environmental and topographical constraints which together with Green Belt (to the town's eastern side) have significantly impacted on opportunities to deliver development, including employment land and local employer/affordable housing. Proximity to the West Midlands conurbation also results in significant influence from this direction and Bridgnorth has relatively high house prices and an imbalance between housing and local employment, with relatively high levels of in and out commuting in a context of limited public transport, resulting from its location off the rail and main motorway network. Recent issues with the delivery of the allocated housing site in Bridgnorth have further undermined new housing provision.

We therefore identified a particular need to address these issues through the provision of appropriate high-quality housing and employment. Specifically, the Preferred Options consultations identified guidelines for the provision of 1,500 dwellings and 16ha of employment land.

Following the consideration and exhaustion of other identified growth options, we consulted on proposals to accommodate much of this growth within a 'garden' style sustainable development on land currently within the Green Belt to the east of the town and bordered to the east by an employment site which is currently inset within the Green Belt. We also consulted on proposals to remove land from the Green Belt for safeguarding to meet the longer-term development needs beyond the current Plan period.

The smaller settlements of Albrighton and Shifnal which are accessible to the M54 and are located on the Shrewsbury-Birmingham railway line are identified as Key Centres with a proportionate role in delivering strategic growth objectives in the east of the County. These settlements together with the village of Alveley (identified as a Community Hub), are wholly within Green Belt and there are no significant brownfield or infill opportunities available for these settlements.

In Albrighton, we proposed to accommodate growth needs (of around 500 dwellings and 5ha of employment land) through existing commitments and on previously safeguarded land. However, as this would exhaust all remaining safeguarded land, we also consulted on proposals to remove further land from the Green Belt and safeguard it to meet longer-term development needs beyond the current Plan period.

Previously safeguarded land and allocated employment land within Shifnal has been depleted. Furthermore, within Shifnal there is considered to be a particular need for additional employment to balance previous high levels of housing development. As such we consulted on proposals to accommodate growth needs (of around 1,500 dwellings and 40ha of employment land) on existing commitments and through release land from the Green Belt to meet development needs within and beyond the current Plan period.

We also consulted on proposals in Alveley which were considered in scale with the settlement (for around 130 dwellings). These proposals involve the removal of relatively small areas of land from the Green Belt to meet development needs within and beyond the current Plan period.

RAF Cosford is an operational military base and airfield with associated uses including a museum and areas utilised by the West Midlands Air Ambulance and West Midlands Police. The site is identified within the current adopted Plan as an existing major developed area within the Green Belt. The strategic sites consultation recognised emerging proposals for the site in relation to the development of military, museum, training and other activities. To facilitate the proposed growth and development of this site, we consulted on proposals to remove some or all of the site from the Green Belt.

Additionally, as you are no doubt aware, a further potential strategic site within Green Belt, to help meet development needs beyond Shropshire, has been identified and

consulted upon at Land to the north of Junction 3 of the M54. The final decision on whether this land will be included in Shropshire Council's Local Plan will be made by the Council in May.

Further information on these proposals within each of these stages of consultation and the evidence base which has informed it is available on the Shropshire Council website at: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/>

### **Duty to Cooperate**

The consultation proposals for growth within settlements within and on the edge of the Green Belt were identified as local options to meet specific sustainable development needs. Therefore, through previous stages of consultation to inform the review of the Local Plan, we have identified and tested options for meeting growth within Shropshire .

However, clearly Shropshire Council will need to demonstrate exceptional circumstances for the release of any Green Belt and as you are aware a pre-condition of NPPF (paragraph 137) is that before concluding that exceptional circumstances exist, we need to demonstrate that all other reasonable options have been explored.

Therefore, in order to formalise previous discussions undertaken as part of the Duty to Cooperate, we are formally seeking the views from neighbouring authorities about whether they could accommodate some of the identified needs for development. In due course we are intending to record these conversations through a Statement of Common Ground.

Given the nature of Shropshire, in particular the extent of land beyond the Green Belt, we would like to gain an understanding of whether your authority is able to assist us in meeting the specifically identified development needs for:

- Bridgnorth;
- Albrighton;
- Shifnal;
- Alveley; and
- RAF Cosford.

For the purpose of this exercise, it would be helpful for you to consider the following:

- The preferred option development requirements for each location as set out above;
- Whether there is available and deliverable land within your local authority area which would be able to functionally serve the geographical location(s) and strategic purposes identified;
- If your authority is able to assist, the mechanism through which this would be forthcoming, in particular integration with your plan making, noting that Shropshire is intending to carry out Regulation 19 consultation in June/July 2020;
- How much/which of the 'preferred option' development requirements you are able to accommodate within your plan area;



- Details of suitable sites in your plan area to meet our specific identified Green Belt needs, including whether the proposed sites are 'deliverable' within 5 years or 'developable' between years 6 and 15 of our plan period; and
- How you consider the proposed site(s) satisfy the 'sustainable development' criteria.

If at all possible we would like to encourage responses by 20<sup>th</sup> March 2020. Given the detailed background and nature of this enquiry I would be very happy to provide additional information and if you feel it would be helpful organise a specific Duty to Cooperate meeting which we could host at our offices. I would hope to be able to do this at the earliest opportunity. In any case please do not hesitate to contact me for further discussion about the content of this letter.

Yours Sincerely

Shropshire Council