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Shropshire Green Belt Review: Stage 2

**Final Report
Prepared by LUC for Shropshire Council
November 2018**



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1 Introduction

Overview

- 1.1 LUC was commissioned by Shropshire Council to undertake a Stage 2 Green Belt Study assessing the potential harm of releasing areas of potential development opportunity 'Opportunity Areas', , from the Green Belt. The Stage 2 Green Belt Study follows on from a Stage 1 Assessment LUC completed in September 2017¹. Together both studies will inform the Council's Local Plan Partial Review 2016-2036.
- 1.2 The Stage 1 Assessment divided all of the Green Belt within Shropshire into 85 discrete land areas and assessed the extent to which they serve the Green Belt purposes, as defined in paragraph 134 of the National Planning Policy Framework (NPPF)². The aim of this was to assess the relative performance of the Green Belt within the whole of Shropshire.
- 1.3 The Stage 2 Green Belt Study looks in greater detail at 29 'Opportunity Areas' around existing settlements, as well as around Cosford village and military base, and Junctions 3 and 4 of the M54 motorway. The Council wishes to examine a range of options, including Green Belt release, in considering an appropriate strategy to meet the growth objectives of the Local Plan review (2016 -36) and Shropshire's potential development requirements beyond 2036. The Green Belt review focuses on the potential of strategic geographical locations to meet development needs and support a sustainable pattern of future growth in the County.
- 1.4 The review therefore includes land around identified settlements in/adjoining the Green Belt, Cosford military base, which is identified as a major developed area, and other strategic locations along the M54/A5 corridors with a focus on junctions 3 and 4 of the M54. These are locations where areas are being considered for removal from the Green Belt, either to recognise the existing urbanised character of land or to allocate land for housing and employment development to meet needs to 2036 or, to safeguard land to accommodate future development needs beyond 2036.
- 1.5 The Stage 2 Green Belt Study draws on the findings of the Stage 1 Assessment and the contribution of parcels to the Green Belt purposes but also considers the harm of removing parcels and Opportunity Areas from the Green Belt, taking into account the impact on the integrity of the remaining Green Belt land and the strength of the remaining Green Belt boundaries.
- 1.6 This chapter sets out the background to the Stage 2 Study, the key study objectives and the structure of the remaining report.

¹ Shropshire Green Belt Assessment (August 2017) Prepared by LUC.

² The Green Belt Assessment referenced NPPF (2012), however the purposes of Green Belt unchanged in the 2018 review

Background

- 1.7 The NPPF advises that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or updating of plans.
- 1.8 The broad extent of the Shropshire Green Belt was established in 1975 as part of the West Midlands Metropolitan Green Belt surrounding the West-Midlands conurbation and Coventry. The Green Belt within Shropshire was last subject to review by Bridgnorth District Council during the preparation of the Bridgnorth Local Plan 1996-2011 (adopted in 2006), prior to the formation of Shropshire Council in 2009.
- 1.9 The adopted Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with adopted Neighbourhood Plans³. These documents set out proposals for the use of land and policies to guide future development in order to help to deliver the sustainable growth in Shropshire for the period up to 2026.
- 1.10 Shropshire Council is currently undertaking a Local Plan Partial Review (2016-2036) to:
 - address the requirements of the SAMDev Plan Inspector;
 - extend the Plan period to 2036;
 - allow consideration of updated information on development needs; and
 - ensure the continuing conformity of the Local Plan with national policy.

Aims and Objectives

- 1.11 The aim of the Stage 2 Green Belt Study is to undertake an independent, robust and transparent assessment of the potential harm of releasing Green Belt land within 29 identified Opportunity Areas.
- 1.12 The Study objectives are to:
 - Present the findings of the Stage 1 Green Belt Study and the performance of the identified parcels around settlements against the five nationally defined purposes of the Green Belt as set out in the NPPF.
 - Provide clear conclusions on the potential degree of 'harm' that may occur if parcels and Opportunity Areas were to be released from the Green Belt. This takes into account both the contribution of the areas to the Green Belt purposes and the potential impact on the wider integrity of the Green Belt and Green Belt boundaries if they were to be released.
 - Outline what potential 'design principles' could be applied to the Opportunity Areas that have been assessed to minimise potential harm to the wider Green Belt.

³ Neighbourhood Plans are referenced in the relevant settlement sections

1.13 Direct and indirect environmental and sustainability effects of development in the Green Belt, such as impacts on landscape quality, biodiversity value, heritage impacts, flooding, traffic generation, infrastructure requirements are not considered as part of this Study. However, such issues are important considerations in establishing the necessary 'exceptional circumstances' for making alterations to Green Belt boundaries. These matters will be considered and evidenced separately by Shropshire Council.

Report Structure

1.14 The remainder of this report is structured as follows:

- **Chapter 2** summarises relevant national and local planning policy. It also provides a brief background on the origins of the Shropshire Green Belt.
- **Chapter 3** sets out the Stage 2 assessment methodology.
- **Chapter 4** summarises the findings of the Stage 2 Green Belt assessment.
- **Chapter 5** sets out potential design principles for minimising harm to the Green Belt and other considerations relating to safeguarded land and enhancing remaining Green Belt Land.

2 Study Context

Introduction

- 2.1 This chapter summarises relevant national and local planning policy, and provides a brief background to the origins and development of the Shropshire Green Belt. This information is also included in Chapter 2 of the Stage 1 Green Belt Assessment report but is repeated here for completeness.

National Green Belt Policy

- 2.2 The NPPF was updated in July 2018. Chapter 13 sets out current national Green Belt policy (paragraphs 133-147). The NPPF is supplemented by additional National Planning Policy Guidance (NPPG).
- 2.3 Paragraph 133 of the NPPF states 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'. This is elaborated upon in NPPF paragraph 134, which states that Green Belts should serve five purposes, as set out below. The NPPF does not infer that any weighting should be applied to the five purposes. The five purposes are set out in **Box 2.1**:

Box 2.1: The purposes of Green Belt

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

- 2.4 The NPPF emphasises in paragraph 136 that '*once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*'.
- 2.5 Paragraph 137 requires that 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*' before concluding that the exceptional circumstances exist, specifically whether the strategy:
- 'makes as much use as possible of suitable brownfield sites and underutilised land;
 - optimises the density of development...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

- 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.’

2.6 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.’⁴.*

2.7 The NPPF also states in paragraph 139 that when defining boundaries, local planning authorities should:

- *‘ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *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;*
- *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;*
- *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’*

2.8 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states *“local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”* (Paragraph 141).

2.9 It is important to note, however, that these positive roles should be sought for Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to keep land permanently open. Openness is not synonymous with landscape character or quality.

⁴ This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- 2.10 Paragraph 143 and 144 state that *"inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."*
- 2.11 Paragraphs 145 sets out the types of development that are appropriate in the Green Belt including:
- *"buildings for agriculture and forestry;*
 - *appropriate facilities for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
 - *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
 - *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
 - *limited infilling in villages;*
 - *limited affordable housing for local community needs under policies set out in the development plan; and*
 - *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - *Not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*
 - *Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."*
- 2.12 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:
- *"mineral extraction;*
 - *engineering operations;*
 - *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - *material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and*
 - *development brought forward under a Community Right to Build Order."*
- 2.13 Neither the NPPF nor the NPPG provides any specific advice regarding the methodology for undertaking Green Belt reviews, and no reference is made to different scales of review.

Existing Local Plan Policy

Shropshire Local Development Framework:

Core Strategy (2011)

- 2.14 A number of policies in the Shropshire Local Development Framework: Adopted Core Strategy (2011) directly relate to the Green Belt and safeguarded land within Shropshire.
- 2.15 Core Strategy Policy CS1 (Strategic Approach) highlights that rural areas will become more sustainable through a '*rural rebalance*' approach with development and investment being located predominantly in community hubs and community clusters. The policy also highlights that outside of these settlements, development will primarily be for economic diversification and to meet the needs of the local communities for affordable housing.
- 2.16 Core Strategy Policy CS3 (The Market Towns and Other Key Centres) indicates the development of market towns and other key centres will be constrained by the Green Belt in Bridgnorth, Shifnal and Albrighton. Whilst some development will be permitted to meet the needs of returning military personnel in Shifnal and Albrighton, the policy highlights that there will be no changes made to the Green Belt boundaries in these areas in the current plan period.
- 2.17 Core Strategy Policy CS4 (Community Hubs and Community Clusters) precludes development outside of rural settlements, unless it meets policy CS5 (Countryside and Green Belt) (see below).
- 2.18 Core Strategy Policy CS5 (Countryside and Green Belt) seeks to protect the countryside and the Shropshire Green Belt. This policy highlights that development proposals which meet national Green Belt criteria will be permitted only on appropriate sites which maintain and enhance countryside vitality and character and improve the sustainability of rural communities. The policy highlights that land within the development boundaries of the settlements of Shifnal, Albrighton, Alveley, Beckbury, Claverley, and Worfield, and land at the Alveley and Stanmore Industrial Estates, is excluded from the Green Belt (but nevertheless remains countryside).
- 2.19 In addition to appropriate development in these locations, the Policy allows limited infilling in any other Community Hub or Community Cluster listed in the SAMDev Plan and limited local affordable housing on exception sites, which accord with the requirements of CS11 (Type and Affordability of Housing). Areas of safeguarded land are additionally reserved at Shifnal and Albrighton. Limited defence related development is also permitted within the Green Belt at the military base and Royal Air Force Museum at Cosford which is identified as a major existing developed site.
- 2.20 Core Strategy Policy CS11 (Type and Affordability of Housing) indicates that 100% affordable dwellings are permitted within the Green Belt subject to scheme justification and in accordance with the Council's detailed criteria and conditions.
- 2.21 As detailed in **Chapter 1**, Shropshire Council is currently undertaking a Local Plan Partial Review (2016-2036). The purpose of the review is to update those elements of the plan that are considered necessary, and to ensure that Shropshire Council can respond flexibly to changing circumstances in line with the NPPF. The Stage 1 Green Belt Assessment and Stage 2 Green Belt Study

contribute to meeting a commitment to review the Green Belt identified in the Examination Report for the SAMDev Plan. This is discussed further below.

Shropshire Site Allocations and Management of Development (SAMDev) Plan (2015)

- 2.22 Development Management Policy MD6 (Green Belt) of the adopted Shropshire SAMDev Plan highlights that development will only be permitted within the Green Belt if it can be demonstrated that it does not conflict with the purposes of the Green Belt. Development will be supported for economic uses, defence uses, local community use or affordable housing uses on previously developed sites which would not have a greater impact on the openness of the Green Belt than the existing development, and which would enhance the site and contribute to the landscape setting. Additionally provision is made for appropriate but limited infilling of identified Community Hubs or Clusters and military or economic uses at RAF Cosford, as a major developed site.
- 2.23 Settlement Policies within the adopted Shropshire SAMDev Plan also directly address the Green Belt and safeguarded land within Shropshire. Explanatory text to Settlement Policy S1 (Albrighton Area) highlights 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 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 should be treated like Green Belt land in the meantime.
- 2.24 Settlement Policy S3 (Bridgnorth Area) highlights that the Green Belt in this area requires review as it is presently causing development to extend north-west causing a high concentration of development at Tasley. Additionally, protected employment sites are located in Bridgnorth in the north of the town and a larger parcel to the South West of the town which is enveloped to the East, West and South by the Green Belt.
- 2.25 Settlement Policy S3.3 (Bridgnorth Area) indicates that developments which contribute to the area's economy are encouraged on sites that are not included in the surrounding Green Belt at Stanmore Industrial Estate and at Alveley Industrial Estate.
- 2.26 Settlement Policy S15 (Shifnal area) states 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 current Plan period.

Neighbourhood Plans

- 2.27 In addition to the Local Plan and SAMDev Plan, two settlements within the Green Belt have adopted Neighbourhood Plans: Shifnal and Albrighton. However, the Albrighton Neighbourhood Plan is not a Neighbourhood Development Plan under the provisions of the Localism Act. Instead it is referred to as a Neighbourhood Plan 'light' and only provides detail that, along with the Core Strategy and the SAMDev, informs future development in Albrighton.

The Shropshire Local Plan Partial Review

- 2.28 In line with the PPG⁵, a plan should be reviewed 'whole or in part at least every 5 years' to be kept up-to-date.
- 2.29 Core tasks for the Shropshire Local Plan Partial Review are set out in paragraph 23 of the SAMDev Inspector's Examination Report (2015): "*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.*"
- 2.30 In January 2017, Shropshire Council undertook an eight week Issues and Strategic Options consultation. This consultation sought views from all parties on the key issues and strategic options for the Local Plan Partial Review; it covered the following strategic options:
1. Housing requirement
 2. Strategic distribution of future growth
 3. Strategies for employment growth
 4. Delivering development in rural settlements
- 2.31 During this issues and strategic options consultation, a total of 412 respondents commented.
- 2.32 These responses were then used by the Council to inform the preparation of the 'Preferred Scale and Distribution of Development' document, which underwent an eight week consultation that began in October 2017. The document:
1. sets out the preferred scale of housing and employment development in Shropshire 2016-36;
 2. sets out the preferred distribution of this growth;
 3. identifies housing and employment growth guidelines for the strategic centre and each principal and key centre;
 4. confirms the methodology which Shropshire Council proposes to adopt to identify a settlement hierarchy in Shropshire;
 5. lists the settlements which form part of this hierarchy, including those that will, in future, be identified as Community Hubs and those that will be maintained as Community Clusters;
 6. proposes draft policies for the management of development within Community Hubs and Community Clusters; and
 7. identifies other development requirements which may need to be addressed as part of the Local Plan Review.
- 2.33 During this Preferred Scale and Distribution of Development Consultation, a total of 591 respondents commented. These responses will be used by the Council to inform the preparation of the 'Preferred Options' for the Local Plan Partial Review.

⁵ Ministry of Housing, Communities & Local Government (2018) Guidance: Plan-making. Paragraph: 043 Reference ID: 61-043-20180913. Available at: www.gov.uk/guidance/plan-making.

The Shropshire Green Belt

Origins and Evolution of the Shropshire Green Belt

2.34 The Shropshire Green Belt is part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry.

West Midlands Metropolitan Green Belt

2.35 Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955⁶. The Green Belt was not formally approved by the Secretary of State until 1975. Today the Green Belt covers over 900 square miles, surrounding the Black Country, Coventry, Birmingham and Solihull.

2.36 The Green Belt has remained relatively successful in checking the sprawl of Birmingham, Wolverhampton and Coventry, preventing the merging of settlements and encroachment into the surrounding countryside, helping to preserve the setting and special character of the constellation of satellite settlements that inhabit it.

2.37 A Study by David Tyldesley and Associates in 2009⁷ categorised areas of Green Belt as 'Urban Spaces', 'Rural Fringe' and 'Outer Green Belt' defined for their consistent blends of environmental, amenity and land use characteristics. The Study developed a vision for the West Midlands Green Belt set out in **Box 2.2**:

Box 2.2: Vision for the West Midlands Green Belt (2009)

"By 2030 the West Midlands Green Belts will be positive contributors to quality of life and economic performance within the region.

By providing accessible and high quality, multifunctional spaces which offer improved opportunity for informal recreation and sports activities within a setting of distinctive landscape character supporting a robust biodiversity resource, the Green Belts will become a positive environmental and recreational regional asset.

The open character of the Green Belts will be maintained and managed so as to allow natural processes to occur unhindered and deliver ecosystem goods and services, helping combat the causes and consequences of climate change. Agriculture and forestry will remain predominant land uses, supplying high quality and healthy produce close to major populations. Where openness can be maintained, renewable energy generation will be a sustainable product of the Green Belts.

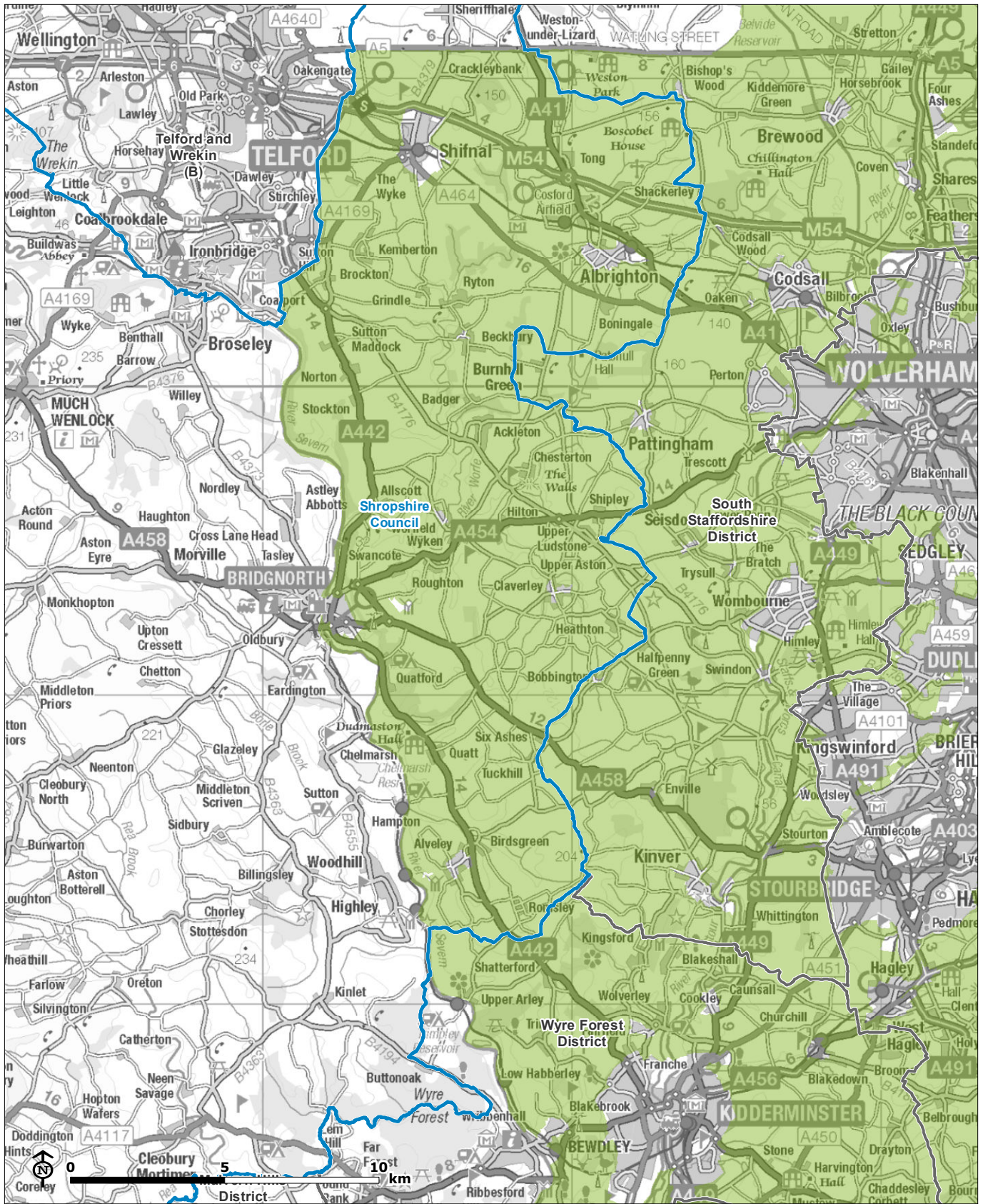
The Green Belts will present attractive and distinctive settings for the major urban areas, reinforcing regional identity whilst maintaining their primary functions."

The Shropshire Green Belt

2.38 The Shropshire Green Belt is located on the western edge of the West Midlands Metropolitan Green Belt in the south east of Shropshire. **Figure 2.1** shows the extent of the Green Belt in Shropshire.

⁶ What Price West Midlands Green belt, Campaign to protect Rural England: West Midlands (June 2007)

⁷ Examination of Positive Uses of the West Midlands Green Belts, David Tyldesley and Associates (2009).



- Shropshire Council
- Other Local Authority
- Green Belt

SHROPSHIRE GREEN BELT REVIEW

Figure 2.1: Green Belt Context



Source: DCLG

Map Scale @ A4: 1:175,000

- 2.39 According to the Green Belt statistics published by the DCLG, in 2015/16 Shropshire contained around 24,480 hectares of Green Belt land. This represents approximately 8% of the total area of Shropshire, which is 319,728 hectares, and approximately 1.5% of the total area of Green Belt land in England, which is 1,635,480 hectares.
- 2.40 The Green Belt within Shropshire forms part of the larger Green Belt designation within the West Midlands region of England. The larger Green Belt designation in the West Midlands region of England covers a total of 220,210⁸ hectares. The Shropshire Green Belt represents approximately 11% of the West Midlands Green Belt.
- 2.41 In Shropshire, the Green Belt adjoins the eastern border of the county with Staffordshire extending from the A5 southwards to the border of Wyre Forest District and as far west as Bridgnorth. The Green Belt also wraps around the following inset settlements; Albrighton, Alveley, Beckbury, Claverley, Shifnal and Worfield, as well as Alveley and Stanmore Industrial Estates (which are inset into the Green Belt).
- 2.42 The 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. The land in the Green Belt becomes more elevated west of Shifnal and east of Albrighton. Additionally, a section of high land is present between Alveley and Enville.
- 2.43 The M54 crosses the northernmost part of the Green Belt in a broadly east-west direction, with the A442 running closely along the western border of the Green Belt in a roughly north-south direction. A number of A roads radiate outwards across the Green Belt from Bridgnorth to link with Wolverhampton (A454), Stourbridge (A458), Kidderminster and Telford (A442), with the A41 linking the M54 (and Albrighton) to Wolverhampton to the south east.
- 2.44 The Green Belt land is predominantly classed as Grade 2 or 3 agricultural land which is arable land or grassland⁹. 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 Worfe¹⁰ (the need to protect and enhance these networks being detailed in Core Strategy Policy CS17 (Environmental Networks)). 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. They are all located within the Shropshire Green Belt and there are significant opportunities to enhance these networks through 'compensatory improvements' linked to the Green Belt.
- 2.45 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.

⁸ Total area of Green Belt within the West Midlands Green Belt (<http://www.staffordbc.gov.uk/live/Documents/Planning%20Policy/Plan%20for%20Stafford%20Borough/PFSB-Adoption.pdf>.)

⁹ Department for Environment Food & Rural Affairs – Magic Map (<http://magic.defra.gov.uk/magicmap.aspx>)

¹⁰ Shropshire Council – Shropshire Environment Network (<https://new.shropshire.gov.uk/environment/biodiversity-ecology-and-planning/shropshire-environmental-network/>)

3 Methodology

Introduction

- 3.1 This Chapter sets out the methodology that was used to undertake the assessment. This Stage 2 Study assesses 29 Opportunity Areas within Shropshire’s Green Belt land against the five Green Belt purposes and draws conclusions on the relative harm to the Green Belt that may result from their potential release for development. The methodology is consistent with the previous Stage 1 Green Belt Assessment undertaken by LUC which assessed the whole of the Green Belt.
- 3.2 The 29 Opportunity Areas were identified by Shropshire Council as broad locations to provide areas of search around established settlements and strategic corridors and locations. They provide a means to test options in Shropshire Council’s consideration of potential allocations of land for housing and employment development (and associated infrastructure), or to safeguard land to allow for future development needs. They were also used as an opportunity to assess the potential Green Belt impacts of promoted development locations.

Assessment Approach

- 3.3 The Opportunity Areas were identified around four of the inset settlements within the Shropshire Green Belt:
- Albrighton
 - Alveley
 - Bridgnorth
 - Shifnal
- 3.4 In addition, Opportunity Areas were also identified around the additional potential growth areas of Cosford and Junction 3 and Junction 4 of the M54 Motorway.
- 3.5 For each of these locations, the detailed assessment findings in **Appendices 1-7** are presented in four parts, as follows:

Part 1: Settlement/Area Context	<p>Where this relates to a settlement it describes each settlement’s location and status in the local settlement hierarchy, landscape features and transport connections, development history and planned future growth.</p> <p>In the case of other locations (Cosford and Junctions 3 and 4 of the M54 Motorway), appropriate strategic, economic and geographical context is provided.</p>
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Part 2: Parcel Assessments	<p>This sets out:</p> <ul style="list-style-type: none"> the findings of the Stage 1 Green Belt assessment for the parcels around the settlements/Study areas – this includes the contribution they make to the NPPF purposes. the nature of any alternative Green Belt boundaries if the parcel was to be released. the potential ‘harm’ to the Green Belt of releasing each individual parcel. This includes the identification of any sub-areas where harm may be lower than the release of the parcel as a whole. an overall map summarising the harm of the parcels or any sub-parcels.
Part 3: Opportunity Area Assessments	<p>This sets out:</p> <ul style="list-style-type: none"> the potential harm to the Green Belt of releasing Opportunity Areas around the settlement or potential growth area. This includes the identification of any sub-areas where harm may be lower. any potential mitigation / boundary enhancement measures that could be implemented to minimise harm to the Green Belt.
Part 4: Conclusions	<p>This summarises the key findings of the assessment in the context of the proposed settlement, or potential growth area.</p>

3.6 The extent of existing or potential beneficial use (i.e. for access, outdoor sport and recreation, landscape enhancement, visual amenity, biodiversity and improvement to damaged or derelict land) does not form part of the judgement of harm, as the NPPF makes it clear that beneficial uses are a desirable consequence of Green Belt designation rather than a reason for designation. It may, however, constitute part of the consideration of environmental factors that the Council will weigh up against Green Belt harm and other sustainability considerations before deciding on which areas of land may be suitable for release and development.

3.7 The following section provides further detailed information on the four main parts of the assessment approach.

Part 1: Settlement/Area Context

- 3.8 Part 1 sets out the context for each location , including information on:
- existing population;
 - historic pattern of development;
 - existing safeguarded land;
 - strategic context;
 - anticipated potential future growth within each area, as defined by the Shropshire Council Preferred Scale and Distribution of Development consultation document (2017).

Part 2: Parcels - Assessment of Harm on the Green Belt

- 3.9 Part 2 assesses how the Green Belt land around each settlement/area of interest performs as Green Belt and identifies the potential harm resulting from the release of land. This was undertaken by assessing the harm of releasing the Green Belt parcels identified Stage 1 Green Belt Assessment (2017).

Relationship to settlement/countryside

- 3.10 A description of each Green Belt parcel identifies how the parcel relates to the countryside and/or the adjoining settlement/significant developed area, providing context to inform the assessment of each parcel's contribution to the Green Belt purposes, the potential alternative Green Belt boundaries that could be formed resulting from release, and the likely harm to the Green Belt resulting from release.

Assessment of Green Belt contribution

- 3.11 The Stage 1 Green Belt Study analysed how each Green Belt parcel performs against each of the Green Belt purposes with the exception of the fifth purpose – encouraging the recycling of derelict and other urban land to assist in urban regeneration.
- 3.12 Historically, most Green Belt studies have not assessed in detail individual Green Belt land parcels against purpose 5, either opting not to rate them or rating them all equally, on the grounds that it is difficult to support arguments that one parcel of land makes a higher contribution to encouraging re-use of urban land than another. The PAS guidance states:

"...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose."

- 3.13 In other words, it is debatable whether development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.

- 3.14 This Study acknowledges that Purpose 5 is important and should be afforded equal weight with Purposes 1-4 in the assessment of the contribution of Green Belt land to the Green Belt purposes, but does not draw out variations in contribution to Green Belt Purpose 5. All Green Belt land within Shropshire is considered to perform strongly against Green Belt Purpose 5.
- 3.15 With the exception of assistance in urban regeneration, all the Green Belt purposes can be seen to require consideration of the relationship between the assessment area, settlements and the countryside as influenced by the following common factors:
- **Development and land use** – the extent and form of existing development, and land use characteristics, affect the degree to which Green Belt can be considered to be part of the countryside rather than an extension of the urban/settled area.
 - **Location** – the position of Green Belt in relation to other distinctive pockets of Green Belt land and settlements can affect its role in relation to the potential expansion of settlements.
 - **Separating features** – physical elements such as woodland blocks, rivers and ridges or areas of primary constraint (e.g. SACs, SSSIs) have a physical and visual impact on settlement-countryside relationships.
 - **Connecting features** – physical elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.
- 3.16 In addition to the five purposes of Green Belt, the NPPF refers to two 'essential characteristics': 'openness' and 'permanence'. Both characteristics are applicable to all assessment criteria. These are defined in more detail below.
- 3.17 The assessment criteria used to undertake the assessment of contribution to the Green Belt purposes are set out in the following tables for each respective purpose. These are the assessment criteria that were used to undertake the Stage 1 Green Belt Assessment (2017) undertaken by LUC. The assessment of contribution to the Green Belt purposes for each parcel (as presented in Parts 2 in Appendices 1-7) has not changed from the Stage 1 report.
- 3.18 For each Green Belt purpose, a description of the rationale for the assessment criteria is provided followed by a table (**Table 3.1-Table 3.4**) summarising each of the proposed criteria.
- 3.19 For Green Belt Purposes 1-4, the tables set out:
- a) The NPPF Green Belt **Purpose**.
 - b) The **key issue(s)** considered.
 - c) The assessment **criteria** used.
 - d) General guidance on **rating contribution**.
 - e) **Assessment notes** providing further detail on how each assessment criterion was assessed in the Study.

3.20 To assess contribution, ratings (Strong, Moderate, Weak, No Contribution) were given to express the relative performance of the Green Belt parcels against each NPPF purpose. The criteria and ratings were also used in Stage 2 to assist with the assessment of potential harm to the Green Belt from release of each parcel (in Part 2) and in Part 3 to determine the potential harm to the Green Belt resulting from release of land within each Opportunity Area.

Openness

3.21 Two important planning appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect.

3.22 **Spatial openness** as a characteristic can be considered in terms of the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt¹¹. Similarly, the location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to affect openness. The NPPF lists in paragraph 145 a number of types of buildings that are 'not inappropriate' within the Green Belt. As a matter of law, development such as agriculture and forestry which is appropriate in the Green Belt and is not required to 'preserve the openness' of the Green Belt cannot be considered to impinge on its openness¹².

3.23 **Visual openness** is important in so far as it relates to the purposes of Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2). Openness of aspect is a characteristic quality of the countryside. 'Safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting...of historic towns' (Purpose 4) includes visual setting¹³. For example, a range of natural and man-made features – topography, vegetation, buildings and linear features such as roads and railways – can contribute to or compromise the visual openness of the Green Belt. A key distinction however is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact, this does not diminish the *spatial openness* of the Green Belt.

3.24 As noted by the Inspector to the Welwyn Hatfield Borough Council Local Plan Examination (2017) openness is not concerned about the character of the landscape, but instead relates to the '**absence of built development and other dominant urban influences**'.

¹¹ This point is made in the judgement in Heath & Hampstead Society v London Borough of Camden (2008), see Appendix 1.

¹² Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016), see Appendix 1.

¹³ This point is made in the judgement in Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016).

Permanence

- 3.25 The concept of permanence is a planning consideration rather than a physical one. Nevertheless, it is recognised that there are benefits in using other features as Green Belt boundaries, where these are clearly defined on the ground and perform a physical and/or visual role in separating town and countryside.

Purpose 1: To check the unrestricted sprawl of large built up areas

- 3.26 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because Purpose 1 is the principal objective of the Green Belt as a strategic planning designation. However, the Study requires one area to be distinguished from another in terms of the extent to which they perform this purpose. This requires a detailed, site specific assessment against this strategic purpose.

Shropshire's 'Large Built Up Area':

- 3.27 There is no definition provided in the NPPF or a standard definition for a 'large built up area.' It has therefore been necessary to determine what constitutes the 'large built up area' for the purposes of this Study.
- 3.28 As Shropshire does not have a large built up area, it was agreed with Shropshire Council that Telford and the West Midlands conurbation should be considered to be the 'large built up areas' surrounding the Green Belt. Of these, only Telford is adjacent to the Green Belt in Shropshire. Therefore, only those areas within the Shropshire Green Belt that lie adjacent to the 'large built up area' of Telford have been considered under Purpose 1 for this Study. The Green Belt lying adjacent to other settlements or potential growth areas within the Shropshire Green Belt, such as Shifnal, Bridgnorth and Albrighton, do not contribute to Purpose 1 as they do not form part of a 'large built up area'.

Definition of 'Sprawl':

- 3.29 The PAS guidance¹⁴ states in relation to Purpose 1:

"The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"

- 3.30 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPi Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:

"As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."

¹⁴ Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015)

- 3.31 Definitions of sprawl vary, but the implication of the terminology is that restricted development may not contravene this purpose. However, in assessing the contribution that land makes to preventing sprawl, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.
- 3.32 Given this definition, land immediately adjacent to the large built up area is likely to contribute to this purpose, as it provides the boundary and zone of constraint to urban expansion. Nevertheless it should be recognised that sprawl as described can be equally damaging to the overall integrity of the Green Belt, wherever it may arise.

Methodology for assessing the role of the Green Belt in maintaining openness around the 'Large Built Up Area':

- 3.33 Criterion 1a considers whether land has **already been affected** by sprawl and whether it retains an open character. Land areas which have already been compromised by urban sprawl as a result of urbanising influences may be considered to make a weaker contribution to Purpose 1 than those areas where the Green Belt is more open in character. It is important to note that a high rating against criterion 1a does not necessarily imply that Green Belt is performing a more valuable role. The remaining open land in an area significantly affected by sprawl could be considered more valuable in preventing further incursions, or less valuable because it has already been compromised.
- 3.34 Equally important in assessing the role of Green Belt in checking unrestricted sprawl is the extent to which the land area has the **potential** for urban sprawl to occur in the future. Criterion 1b considers the role of the following characteristics in affecting the potential for urban sprawl to occur in the absence of a Green Belt designation:
- **The strength of boundary features** – i.e. where there is a very strong and defensible boundary – such as a river or railway line which may prevent urban sprawl from occurring.
 - **The presence of roads** – i.e. roads (apart from dual carriageways and motorways) allow for greater opportunities for urban sprawl to occur, because of the potential for ribbon development and the wider access they provide. The roads considered under this criterion are also distinct from those identified as boundary features as they will not form part of the existing settlement edge.
 - **Potential for sprawl to occur beyond the area** – in some cases an area may be at risk of urban sprawl but there is little or no potential for sprawl to occur beyond the area– therefore the overall extent of the potential for urban sprawl is limited. Where this is relevant this is taken into account (e.g. where an area is surrounded by existing built development on all sides, or is bounded by existing urban development with a strong separating feature preventing sprawl occurring beyond the immediate area).

Definition of boundary features considered able to check the sprawl of the 'Large Built Up Area':

- 3.35 All boundary features can play some role in preventing urban sprawl. In this Study only railway tracks, motorways, dual carriageways and rivers adjacent to the existing urban edge are considered to be significant in relation to Purpose 1b. It is also a requirement that these features should not have been breached by the large built-up area within the immediate vicinity of the assessment area and that they are demonstrably strong.
- 3.36 Other boundaries, such as streams, and lesser roads are not considered to be strong enough to prevent urban sprawl, for the purposes of this Study. However, such boundary features may form an important part of the landscape and/or pose a physical barrier to unplanned sprawl, albeit one that can more easily be breached. Floodplains are a major factor in restricting development; however the presence of environmental constraints such as SSSIs and floodplains is not being considered. That is a matter for subsequent analysis beyond the remit of this Study. **Table 3.1** summarises the criteria used for the consideration of Purpose 1 in the Study.

Table 3.1: Purpose 1 Assessment Criteria

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Contribution	e) Comments on assessment
<p>1 To check the unrestricted sprawl of large built up areas.</p>	<p>a Protection of open land from urban sprawl.</p>	<p>Does the area exhibit evidence of existing urban sprawl and consequent loss of openness?</p>	<p>Stronger contribution</p> <p style="text-align: center;">↑ ↓</p> <p>No Contribution</p> <p>Adjacent to large built-up area and land contains no or very limited urban sprawl and has a strong sense of openness.</p> <p>Adjacent to large built-up area but land makes no contribution to preventing urban sprawl.</p> <p>or</p> <p>Land does not lie adjacent to the large built up area.</p>	<p>Urban sprawl is the spread of urban areas into the neighbouring countryside. This could be in the form of ribbon development along the edges of roads or built development.</p> <p>Areas which have already been compromised by urban sprawl, as a result of urbanising influences, will play a weaker role than those where the Green Belt is more open in character.</p> <p>Development means any built structure but does not include pylons as these are features of both rural and urban environments and does not include development which is classed as appropriate or not inappropriate development in the Green Belt (as defined in paras 145 and 146 of the NPPF).</p>
<p>1</p>	<p>b</p>	<p>Does the area protect open land from the potential for urban sprawl to occur?</p>	<p>Stronger contribution</p> <p style="text-align: center;">↑ ↓</p> <p>No Contribution</p> <p>Adjacent to large built up area and land has a high potential for urban sprawl to occur.</p> <p>Land makes no contribution to preventing urban sprawl</p>	<p>The features that that are considered relevant to the assessment of potential include:</p> <p>Significant and durable boundary features – Readily recognisable and permanent features are used to define the borders of Green Belt assessment areas. The presence of features which contain development and prevent urban sprawl can, in certain limited locations, reduce the potential role of a Green Belt area in performing this purpose. The significance of a boundary in preventing urban sprawl is judged based on its relative proximity to the existing urban edge of a settlement and its nature. Only motorways, dual carriageways, railway lines and rivers which have not been breached within the relevant land area, or close by, are considered to constitute a very significant and durable boundary that will prevent urban sprawl.</p> <p>Presence of roads – the presence of roads (apart from dual carriageways and motorways) allows for greater opportunities for urban sprawl to occur, because of the potential for ribbon development and the wider access they provide. Where such roads exist, the Green Belt is considered to play a strong role in preventing urban sprawl. These roads are distinct from those considered as boundary features as they will not form part of the existing settlement edge.</p>

a) NPPF Green Belt Purposes		b) Issue(s) for consideration		c) Criteria		d) Contribution		e) Comments on assessment	
								<p>Potential for sprawl beyond the assessment area boundary – in some cases an area may be at risk of urban sprawl within the area itself but there is little or no potential for sprawl to occur beyond the assessment area– therefore the overall extent of the potential for urban sprawl is limited. Where this is relevant this is taken into account. (e.g. where an area is surrounded by existing built development on all sides, or is bounded by existing urban development and has a strong a durable barrier preventing sprawl occurring beyond).</p>	

Purpose 2: To prevent neighbouring towns from merging into one another

3.37 For the purpose of this assessment, 'towns' were considered to include the following 'Principal Centres' and 'Key Centres' as defined in the Shropshire Council Preferred Scale and Distribution of Development consultation document (2017).

Principal Centres and Key Centres:

- Albrighton.
- Bridgnorth.
- Highley.
- Shifnal.

3.38 Shrewsbury and the towns of Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Ludlow, Market Drayton, Much Wenlock, Oswestry, Wem and Whitchurch were not included in this assessment, as they are located away from the Green Belt.


3.39 In addition, Telford was considered a 'town' under Purpose 2 as, although it does not lie within Shropshire, its urban edge lies adjacent to the Green Belt. Bridgnorth and Highley also do not lie within the Green Belt but are adjacent or in close proximity to it. Codsall in South Staffordshire; Kidderminster in Wyre Forest and the metropolitan area of Birmingham/Wolverhampton and Stourbridge and Dudley etc. were also included in the list of Purpose 2 settlements for the assessment.

3.40 The NPPF specifically refers to preventing the merging of towns, not the merging of towns with smaller settlements, or the merging of small settlements with each other. However, it is recognised that the perceived gaps between towns will in turn be affected by the size of gaps associated with smaller, intervening settlements.

3.41 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considers both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This approach accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another.

3.42 A parcel that represents all or most of the physical gap between towns will clearly play an important role in preventing coalescence, so its location and size are significant factors with regard to this purpose. However, the nature of the land between two towns - the role of landform and land cover in connecting or separating them visually or in terms of the character of their settings - and also the character of the settlements themselves will affect the extent to which the closing of a physical gap between them is perceived as reducing settlement separation. **Table 3.2** summarises the criteria used for the assessment of Purpose 2 in the Study.


Table 3.2: Purpose 2 Assessment Criteria

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Contribution		e) Comments on assessment
<p>2 To prevent neighbouring towns merging into one another.</p>	<p>Reduction in visual or physical gaps between settlements.</p>	<p>Does the land prevent the merging or erosion of the visual or physical gap between neighbouring settlements?</p>	<p>Stronger contribution</p>  <p>No Contribution</p>	<p>The land plays an essential role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would cause visual or physical coalescence or substantially reduce the gap.</p> <p>Land makes no contribution to preventing the merging or erosion of the visual or physical gap between settlements.</p>	<p>This purpose seeks to prevent settlements from merging to form larger settlements. The PAS guidance states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Two key elements are therefore used – the extent of the visual and physical gap. This may also include consideration of perceptual issues.</p> <p>The towns considered in the assessment include:</p> <ul style="list-style-type: none"> • Albrighton; • Bridgnorth; • Highley; • Codsall; • Shifnal; • Telford; • Kidderminster; • Birmingham/ Wolverhampton/ Dudley and Stourbridge.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.43 The contribution a parcel makes to safeguarding the countryside from encroachment can be considered in terms of the extent to which it relatively displays the characteristics of countryside, i.e. lack of built development and urbanising influences, and the extent to which it relates to the adjacent settlement and to the wider countryside.
- 3.44 Urbanising influences are considered to include any features that compromise the countryside character, such as roads lined with street lighting and pavements, large areas of hard standing, floodlit sports fields, etc. It is also necessary to consider whether they include development which is commonly found within the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches.
- 3.45 The PAS guidance states that:
- 'The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.'*
- 3.46 The criterion differs from Criterion 1a as it focuses on the extent to which the countryside characteristics of the Green Belt have been compromised by encroachment from urban development or urbanising influences. It also relates to all the identified land areas and not just land adjacent to the large built up areas.
- 3.47 It is important to recognise that Green Belt does not function as a series of isolated areas: the assessment of a defined area will reflect the nature of landscape elements or characteristics within that area but will also reflect its relationship with the wider Green Belt.
- 3.48 **Table 3.3** summarises the criteria that have been used for the assessment of Purpose 3 in the Study.

Table 3.3: Purpose 3 Assessment Criteria

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Contribution		e) Comments on assessment
<p>3 To assist in safeguarding the countryside from encroachment.</p>	<p>Significance of existing urbanising influences and sense of openness.¹⁵</p>	<p>Does the land have the characteristics of countryside and/or connect to land with the characteristics of countryside?</p> <p>Has the land already been affected by encroachment of urbanised built development?</p>	<p>Stronger contribution</p>  <p>No Contribution</p>	<p>The land contains the characteristics of countryside, has no or very little urbanising development, and is open.</p> <p>Land makes no contribution to safeguarding the countryside from encroachment.</p>	<p>Encroachment from urbanising influences is the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit. This may be from buildings within the assessment area or within neighbouring land.</p> <p>Urbanising influences include any features that compromise 'openness', such as roads lined with street lighting and pavements, large areas of hard standing, floodlit sports fields, roads etc. They do not include development which is commonly found within the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches or development which is considered to be appropriate, or not inappropriate development as defined in para 145 and 146 the NPPF.</p> <p>Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.</p>

¹⁵ The significance of existing urbanising influences has a direct influence over the relative openness of Green Belt parcels.

Purpose 4: To preserve the setting and special character of historic towns

3.49 To ensure that the Shropshire Green Belt Assessment takes full account of purpose 4, it has been necessary to define what constitutes a historic town and set out how the role of the Green Belt in preserving setting and special character has been assessed.

Definition of Historic Towns:

3.50 Green Belt assessments have adopted a range of approaches to the definition of historic towns. These typically focus on the presence of designated Conservation Areas, but in some cases have considered whether settlements were recorded as far back as the Domesday Book (e.g. North East Cheshire Green Belt Study).

3.51 For the Shropshire Green Belt Assessment, the presence of Conservation Areas within the towns have been used as a proxy for identifying historic towns/settlements. As a cross check, the Central Marches Historic Towns Survey has also been referred to (1996). The towns considered include some of those identified under Purpose 2: Albrighton, Bridgnorth, Highley, Shifnal and Telford, in so far that Telford incorporates a number of historic settlements. Of these settlements, those within the Severn Gorge Conservation Area (Madeley, Coalport, Ironbridge, Jackfield & Coabrookdale) and Broseley Conservation Area lie closest to the Green Belt.

Assessing the Role of Green Belt in Preserving Setting and Special Character:

3.52 To inform our understanding of the role of the Green Belt in preserving the setting of historic towns, intervisibility analysis was undertaken as part of the desk based assessment. This identified the extent to which Green Belt parcels are visually connected with one or more of the historic towns.


3.53 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.

3.54 The analysis was undertaken as follows:

- A digital ground model of the Study area was constructed using OS digital contour data.
- The current conservation areas/historic cores of the 'historic' towns were overlaid. Conservation areas outside of the 'historic' towns were not considered in the assessment (although they are included on Figures within **Appendices 1-7** for information purposes only.)
- A notional building height of 10m was applied to these areas (it was not possible to model specific buildings or structures such as chimneys).
- Digital analysis was used to identify which Green Belt parcels are intervisible with these urban areas within 5km of outer edge of the historic core.

- 3.55 This is a theoretical analysis based on standard building height and 'bare ground topography' (i.e. not taking account of the screening effect of intervening structures or land cover such as trees and woodland). It does however provide a tool which has been used to inform the desk analysis and to provide information which was tested during the field survey work.
- 3.56 **Table 3.4** summarises the criteria that have been used for the assessment of Purpose 4 in the Study.

Table 3.4: Purpose 4 Assessment Criteria

A) NPPF Green Belt Purposes	B) Issue(s) for consideration	C) Criteria	D) Contribution		E) Comments on assessment
<p>4 To preserve the setting and special character of historic towns.</p>	<p>Significance of historical and/or visual setting to the historic town.</p>	<p>Does the land contribute to the setting and 'special character' of a historic town (s)?</p>	<p>Stronger contribution</p>  <p>No Contribution</p>	<p>The land plays a major role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.</p> <p>Land makes no contribution – i.e. does not form part of the setting or contribute to the special character of historic towns.</p>	<p>The key questions asked in relation to purpose 4 are:</p> <ul style="list-style-type: none"> • What is the relationship of the land with the historic town? • Does the land form part of the setting and/or special character of an historic town? • What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?

Alternative Green Belt Boundaries

- 3.57 The role of boundary features in influencing the contribution to Green Belt purposes, through their role as separating or connecting features, was included within Part 2 of the assessment. However the nature of a boundary in comparison to the existing Green Belt edge, or potential alternative boundaries outside of the assessment area is also a consideration when determining whether a boundary is “*readily recognisable and likely to be permanent*” (NPPF paragraph 139), and will in turn affect the impact that release of an area might have on adjacent Green Belt.
- 3.58 Features considered to constitute strong potential Green Belt boundaries include natural features such as substantial watercourses and water bodies, and man-made features such as motorways/dual carriageways and railway lines. Less prominent or less permanent features such as local roads, woodland, hedgerows, tree lines, streams and ditches are considered to constitute moderate strength boundaries, and edges lacking clear definition on the ground form weaker boundaries.
- 3.59 The suitability of an alternative Green Belt boundary also depends on its relationship with existing boundaries in terms of the resulting form. An overly extended or convoluted shape is likely to cause greater harm than a simpler, more direct alignment in terms of its impact on the relationship between built development and open countryside. For each of the parcels, commentary was provided on the nature of the existing boundary and any suggested alternatives.

Assessment of ‘harm’ to the Green Belt resulting from release of parcels

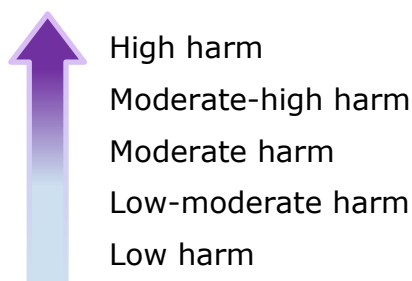
- 3.60 Following on from the assessment of contribution of Green Belt land to the Green Belt purposes, an assessment of the potential harm of release / development was undertaken for each parcel.
- 3.61 This approach is consistent with the latest case law on the matter, notably *Calverton Parish Council v Greater Nottingham Councils & others* (2015) which found that planning judgments setting out the ‘exceptional circumstances’ for the amendment of Green Belt boundaries require consideration of the ‘nature and extent of harm’ to the Green Belt’.
- 3.62 Without a clear definition of the scale, type and design of development which will come forward for development within a specific Green Belt location, the harm assessment is based on the assumption that the openness (in Green Belt terms) of a defined area will be lost. This approach ensures a consistent approach is adopted across the study area. It was not possible to assess specific development proposals in a proportionate or consistent manner.
- 3.63 As previously outlined, the key factors that inform the assessment of Green Belt harm include:
- **The contribution across the area of potential release/development to the NPPF Green Belt Purposes.** Noting that the Stage 1 assessment used a four-point rating scale for contribution (strong, moderate, weak or no contribution), the assessment of harm considers whether contribution to any of the purposes is particularly significant – e.g. where there is a particularly fragile gap between towns – and whether the combination of contribution to different purposes makes the parcel of land more or less significant in Green Belt terms.

- **The potential implications of the loss of openness within the area of potential release/development on the integrity of the wider Green Belt.** This is important as whilst a parcel may not make a significant contribution to the Green Belt in its own right, its location within the Green Belt may have the potential to affect the contribution of neighbouring Green Belt parcels and the wider integrity of the Green Belt.

Key considerations that are taken into account when assessing the impact of release on the integrity of the adjacent Green Belt include:

- **Purpose 1:** Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?
 - **Purpose 2:** How strong would the remaining settlement gap be if the Green Belt land were released? In order to answer this question consideration is given to the size of the gap, the role of constraints and/or the location of separating and connecting features.
 - **Purpose 3:** Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?
 - **Purpose 4:** Would the role of remaining Green Belt in forming a distinctive setting to a historic settlement be diminished by loss of openness in the parcel/site under assessment?
- **Consistency and strength of the Green Belt boundary/urban edge in relation to the potential area of Green Belt release/development.** For example, if the current Green Belt edge forms part of a consistent boundary, e.g. defined by the same readily recognisable element, and creating a new boundary would result in a more varied, less well defined edge, there could be potentially greater harm to the Green Belt.

3.64 The relationship between these factors can vary significantly across a study area. Professional judgement is used to rate Green Belt harm using a 5-point scale:



3.65 Absolute definitions equating Green Belt harm to suitability for release cannot be given. However, where a high degree of potential harm to the Green Belt has been identified, this may relate to land which makes a strong contribution to one or more Green Belt purposes and/or its release for development would

have a significant or partial impact on the integrity of the surrounding Green Belt and/or it would lead to a weak/inconsistent Green Belt boundary.

- 3.66 In some cases a parcel may not make a strong contribution (as assessed in the Stage 1 Study) to any one Green Belt purpose but the release of land will have a significant effect on the surrounding Green Belt and/or on the residual Green Belt boundary which could lead to high overall harm. Vice versa, where a low potential for harm to occur has been identified, this relates to land which does not make a strong contribution to the Green Belt purposes and/or its release would not have a significant effect on the integrity of the surrounding Green Belt and/or lead to a weakened/ inconsistent Green Belt boundary.
- 3.67 Detailed commentary is provided in the assessments (set out in **Appendices 1-7**) on how the judgements relating to the level of harm have been made to fully justify the ratings given. Text is only included on the consistency and strength of the Green Belt boundary in the assessment of harm where this is a key relevant issue for the parcel being assessed¹⁶.
- 3.68 Consideration is also given as to whether there are any scenarios for release of less than the full parcel (a sub-parcel) that would result in reduced harm to the Green Belt.
- 3.69 Where some parcels are found to have lower harm ratings, this does not mean that they should be released/ inset into the Green Belt as there may be other reasons why they are not appropriate for development – i.e. it may not be a sustainable location for development, or it may leave a poorly defined Green Belt boundary. Conversely, where a parcel has a high Green Belt harm rating, there may be overriding sustainability or viability considerations which mean that this may be the most appropriate location for development.

Part 3 Opportunity Areas – Assessment of Harm on the Green Belt

- 3.70 Using the context provided in Part 1, the assessment of how parcels of Green Belt land perform as Green Belt and the identification of the potential harm resulting from the release of these parcels in Part 2, the potential harm resulting from the cumulative release of parcels as Opportunity Areas was assessed in Part 3.
- 3.71 The 29 Opportunity Areas vary considerably in size and form. As stated previously, the key reasons that the Opportunity Areas are being assessed in terms of the impact of removal from the Green Belt are:
- to recognise existing major developed areas or otherwise existing urbanised character of land;
 - to provide evidence to help to consider proposals advanced for development in the Green Belt
 - to look at opportunities and options for allocating land for development, including to support the sustainability of some settlements or a broader area; or
 - to safeguard land to allow for future development needs.

¹⁶ In some cases the release of land could lead to the creation of a similar Green Belt boundary to the existing Green Belt edge, in which case commentary is not included in the relevant assessment of harm.

3.72 The Opportunity Areas, and the Stage 1 parcels within each area, are presented in **Table 3.5**. Where the analysis found that different parts of an Opportunity Area were likely to have different levels of harm, the findings of the assessment reflect these variations with reference to the relevant parcel numbers or sub-parcel areas.

Table 3.5: Summary of Opportunity Areas Assessed

Reference	Parcel References (from Stage 1 GB Assessment)	Size (ha)
Albrighton		
Ab-1	Parcels P32, P38 and P39.	90.1
Ab-1a	Parcel P38 and Sub-parcel P32.	36.4
Ab-2	Parcels P35, P36 and P37.	240
Ab-2a	Sub-parcels P35 and P36.	13.9
Alveley		
Av-1	Parcels P70 and P79a and Sub-parcels P69 and P71.	40.6
Av-1a	Parcel P70 and Sub-parcels P69 and P71.	27.9
Av-2	Parcels P72 and P73a.	25.3
Av-2a	Sub-parcels P72 and P73.	8.6
Av-3	Parcels P74 and P75 and Sub-parcels P76 and P79.	16.3
Av-3a	Sub-parcels P75, P76 and P79.	6.5
Bridgnorth		
Bn-1	Parcels P55 and P56.	100.6
Bn-1a	Sub-parcel P55.	7.2
Bn-2	Parcels P54, P55, P56, P57, P58, P59 and P60.	369.1
Bn-2a	Parcels P57, P58 and P60 and Sub-parcels P54 and P55.	93.4
Bn-3	Parcels P52, P53, P54, P55, P56, P57, P58, P59, P60, P61, P62 and P63.	704.2
Bn-3a	Parcels P57, P58, P60 and P62 and Sub-parcels P54 and P55.	110.6
Cosford		
Co-1	Parcels P28, P30 and P40.	451.5
Co-1a	Parcels P28 and P30 and Sub-parcel P40.	386.8
Co-1b	Parcel P28 and Sub-parcels P30 and P40.	320.5
Co-2	Parcels P28 and P29.	403.3
Junction 3		
J3-1	Parcels P8, P25, P26, P28, P29, P30 and P40 and Broad Areas BA1a.	1902.8
J3-1a	Parcels P28 and P30 and Sub-parcel P40.	386.8
J3-1b	Parcel P28 and Sub-parcels P30 and P40.	320.5

Reference	Parcel References (from Stage 1 GB Assessment)	Size (ha)
Junction 4		
J4-1	Parcels P1, P9, P18 and P19.	271
J4-1a	Parcel P9.	18
Shifnal		
Sh-1	Parcels P11, P13a, P14 and P15.	202.3
Sh-1a	Sub-parcel P15.	17.9
Sh-2	Parcels P15, P16 and P17a.	143.7
Sh-3	Parcels P10, P16 and P17 (P17a and P17b).	245.5

Assessment of harm to the Green Belt resulting from release of opportunity areas

- 3.73 With reference to the assessments of contribution and harm for each individual parcel within the Opportunity Areas (Part 2 assessments), judgements were made concerning the harm that the cumulative release of parcels within these areas would have on the Green Belt.
- 3.74 As undertaken for the assessment of harm for each parcel in Part 2, a rating was given for the level of harm that could be expected to result from the release of each Opportunity Area. Consideration was also given as to whether releasing a smaller proportion of a full Opportunity Area (a Sub-opportunity Area) would result in reduced harm to the Green Belt.
- 3.75 As per Part 2, the assessment of potential harm for each opportunity area was given as a rating, using the same 5-point scale. Each rating of harm was arrived at using professional judgement with a detailed commentary provided in **Appendices 1-7**.

Identification of Potential Mitigation and Boundary Enhancements

- 3.76 If decisions are taken to remove land from the Green Belt, the Council should seek to minimise any harm to the remainder of the Green Belt. This will include careful masterplanning of development to ensure that harm is minimised, ensuring Green Belt boundaries are clearly defined using readily recognisable and permanent features, and that positive uses for the wider Green Belt are secured. **Chapter 5** provides general guidance on these issues and identifies what 'design principles' could be applied to minimise potential harm to the Green Belt.
- 3.77 In addition, **Chapter 5** considers how general boundary enhancements could be included within and adjacent to new developments associated with Green Belt release. Some initial guidance on potential mitigation measures is also included in the Part 3 assessments for each opportunity area. This is however draft guidance and there will be additional or alternative measures that could be identified at a later date if the decision is taken to release an area from the Green Belt. Any mitigation measures should also be considered holistically alongside wider sustainability considerations such as the potential opportunities to minimise effects on landscape, biodiversity etc.

Part 4: Conclusions

- 3.78 Part 4 of the assessment of each settlement or potential growth area summarises the assessment of harm for each Opportunity Area and, where relevant, Sub-Opportunity area.
- 3.79 Consideration is also given to the potential impact of the release of Opportunity Areas (and Sub-areas) upon the strategic function of the West Midlands Green Belt, as well as at the local level.
- 3.80 The detailed assessment findings for each of the four parts of the Stage 2 assessment for each settlement and potential growth option area presented in **Appendices 1-7**. These findings are also summarised in **Chapter 4**.

4 Summary of Stage 2 Findings

Introduction

- 4.1 The following chapter provides a summary of the key findings of the Stage 2 Green Belt Study. The Study does not take into account other sustainability issues (e.g. environmental, landscape, heritage, infrastructure constraints) which may affect any decisions by the Council about the suitability or otherwise of potential locations for development. As the Study only considers Green Belt issues, it **does not** draw conclusions regarding which areas of land have the potential to be released from the Green Belt. The assessments for each area assessed (the four inset settlements, Cosford, and Junctions 3 and 4 of the M54 Motorway) are presented in **Appendices 1-7** (for each respective area in turn).

Findings

- 4.2 The Stage 2 Study findings are summarised in **Table 4.1**. The detailed results of the assessments for each settlement and potential growth area are presented in **Appendices 1-7**.

Table 4.1: Summary of Level of Harm

Reference	Size (ha)	Harm Rating
Albrighton		
Ab-1	90.1	High
Ab-1a	36.4	Low - Moderate
Ab-2	240	High
Ab-2a	13.9	Moderate
Alveley		
Av-1	40.6	High
Av-1a	27.9	Moderate
Av-2	25.3	Moderate-High
Av-2a	8.6	Low - Moderate
Av-3	16.3	Moderate-High
Av-3a	6.5	Moderate
Bridgnorth		
Bn-1	100.6	High
Bn-1a	7.2	Low-Moderate
Bn-2	369.1	High
Bn-2a	93.4	Moderate
Bn-3	704.2	High
Bn-3a	110.6	Moderate

Reference	Size (ha)	Harm Rating
Cosford		
Co-1	451.5	Moderate-High
Co-1a	386.8	Moderate
Co-1b	320.5	Low - Moderate
Co-2	403.3	Moderate-High
Junction 3		
J3-1	1902.8	High
J3-1a	386.8	Moderate
J3-1b	320.5	Low-Moderate
Junction 4		
J4-1	271	High
J4-1a	18	Low-Moderate
Shifnal		
Sh-1	202.3	High
Sh-1a	17.9	Moderate
Sh-2	143.7	High
Sh-3	245.5	High

Role of Green Belt Harm Assessment

- 4.3 As outlined above, consideration of the harm to Green Belt that could result from the release of land for development is an essential aspect of establishing the exceptional circumstances for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered in order to establish the necessary exceptional circumstances, most notably the environmental and sustainability effects of development. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in high harm to the Green Belt. In each location where alterations to Green Belt boundaries are being considered, planning judgement will be required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.
- 4.4 Green Belt is a strategic planning designation. Its extent within Shropshire does not reflect any detailed analysis of the environment or the sustainability of growth but represents a general desire to constrain development and prevent the urbanisation of the countryside. Decisions that informed the delineation of the Green Belt around towns such as Bridgnorth, Shifnal and Albrighton were made in light of local development requirements and pressures identified at that time.
- 4.5 In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies relative variations in the harm to the designation.

- 4.6 The Study does not assess the cumulative impact of the release of multiple Opportunity Areas on the Green Belt as a whole. That lies outside the scope of this Study as there are numerous permutations of the 29 areas that could be considered for release. The Study does however consider the potential harm of the release of cumulative parcels of land within the Opportunity Areas on the Green Belt as a whole as summarised in **Table 4.1**.
- 4.7 The Part 4 conclusions set out in **Appendices 1-7** also note that whilst development on Green Belt land may inevitably lead to some degree of encroachment into the countryside within the Green Belt, for most of the opportunity areas assessed, the strategic function of the West Midlands Green Belt within Shropshire will not be affected by the releases of land. At both a strategic level and local level, there will be no harm to the role played by the West Midlands Green Belt in checking the unrestricted sprawl of the large built areas, preventing the merging of neighbouring towns, or preserving the setting and special character of historic towns. The exceptions to this include the release of Opportunity Areas Co-1, Co-2, J3-1, J4-1 and Sh-3. In most of these cases, smaller sub-opportunity areas have been identified which would not lead to any significant effects on Purposes 1, 2 and 4. There will also be additional sub-opportunity areas that could be identified which would also not have an effect on the strategic function of the West Midlands Green Belt within Shropshire.

5 Mitigation and Enhancement of Beneficial Use

Introduction

- 5.1 The following chapter sets out some potential mitigation measures that could be applied to reduce the potential harm to the Green Belt, if the decision is taken to remove areas from the Green Belt. This is followed by a discussion of the potential opportunities for enhancing the beneficial use of the Green Belt (in line with paragraph 141 of the NPPF). However, it should be noted that this Chapter does not contain an exhaustive list of potential mitigation measures or enhancement opportunities. It is therefore recommended that mitigation and enhancement are carefully considered in the context of what development was being proposed when more detailed information is available and in the light of any additional evidence available such as the Shropshire Landscape and Visual Sensitivity Study 2018.

Mitigation to Reduce Harm to Green Belt

The concept of mitigation

- 5.2 One of the factors weighed up in the judgement of harm resulting from the release of a Green Belt area, is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would rate in terms of its contribution to Green Belt purposes were the area in question to be urbanised i.e. would its contribution be lessened? In many cases this is a key factor in the judgement: a site might in itself be small, but its development could represent a more significant change than its physical area might suggest if, for example, this resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.
- 5.3 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area. Although any release of Green Belt land will still require 'exceptional circumstances' to be demonstrated.
- 5.4 Mitigation relates to land under the control of the site owner/developer, and could therefore apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

Mitigation themes

- 5.5 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. As described in the assessment methodology, the Green Belt purposes are considered to relate to the relationship between the land area in question, developed land and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape/physical elements, including boundary features (in either separating the area from, or connecting it to) built-up areas and the wider countryside.
- 5.6 **Table 5.1** below lists some mitigation measures that could be considered as part of the development process.

Table 5.1: Potential measures to mitigate harm to Green Belt

Mitigation measure	Benefits	Considerations
Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance	Maintaining sense of separation between urban and open land	A boundary that is relatively homogeneous over a relatively long distance – e.g. the railway line is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of 'breaches' in such boundaries
Strengthen boundary at weak points – e.g. where 'breached' by roads	Reducing opportunities for sprawl	The use of building and landscaping can create strong 'gateways' to strengthen settlement-edge function
Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within the Green Belt (e.g. major roads)	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge	Reducing perception of urbanisation	This may however have implications in terms of reducing housing yield

Mitigation measure	Benefits	Considerations
Consider ownership and management of landscape elements which contribute to Green Belt purposes	Ensuring permanence of Green Belt	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens)
Enhance visual openness within the Green Belt	Increasing perception of countryside	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside
Preserve/enhance landscape elements which contribute to the setting of Historic settlements e.g. Bridgnorth, parts of Telford, and views which provide an appreciation of historic setting and special character	Preserving setting and special character of historic towns	Landscape character and historic settings assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed
Enhance access within the Green Belt	Increasing perception of countryside	Uses of the countryside that permits an appreciation of it as a connected area with valued characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoiding truncation by major roads, or provision of access along the Green Belt boundary to strengthen its role

Mitigation measure	Benefits	Considerations
Improve management practices to enhance countryside character	Increasing strength of countryside character	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain/create separation between existing washed-over settlement and new inset settlement	Minimising urbanising influences that could weaken the justification for retaining the washed-over settlement's status	Ensure that the gap is sufficiently wide to maintain a sense of separation.
Design road infrastructure to limit perception of increased urbanisation associated with new development	Reducing perception of urbanisation	Increased levels of 'activity' can increase the perception of urbanisation
Use sustainable drainage features to define/enhance separation between settlement and countryside	Strengthening separation between urban and open land	Need to determine if local topography and ground conditions are suitable.

Beneficial Use of Green Belt

- 5.1 The purposes of Green Belt do not make any reference to the quality or use of land falling within the designation, but the NPPF, at paragraph 141, states that:

"Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

- 5.2 Furthermore, paragraph 139 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should '*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*'. This could be achieved through legal agreements in conjunction with the release of land and planning consent for development
- 5.3 The NPPF suggests types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary/buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.

Potential opportunities to enhance use

- 5.4 Many of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land's future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 5.2** below.
- 5.5 Beneficial uses could be achieved through legal agreements in conjunction with the release of land and consent for development.

Table 5.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity. In Shropshire linkages could be provided to identified environmental networks.

Beneficial use	Considerations
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

- 5.6 As outlined in the Stage 1 Report, the Shropshire Environmental Network¹⁷ is a key source of information that could be used to help inform ecological priorities and opportunities for Green Belt land. The Council’s Open Space Assessment and Playing Pitch Strategy also provide helpful information in relation to sport and recreation provision.

Making Changes to the Green Belt

Helping to meet development requirements

- 5.7 The NPPF requires changes to the Green Belt to be made through the Local Plan process.
- 5.8 If such changes are made, this should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.
- 5.9 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes¹⁸. In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, better performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.
- 5.10 In developing an ‘exceptional circumstances’ case it will be necessary to look at the objectively assessed needs for development, the need to promote sustainable patterns of development and whether these needs can be accommodated without releases from the Green Belt, specifically:
- making effective use of suitable brownfield sites and underutilised land;
 - optimising the density of development in town and city centres and other locations well served by public transport; and

¹⁷ <https://new.shropshire.gov.uk/environment/biodiversity-ecology-and-planning/shropshire-environmental-network/>

¹⁸ Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisory Service (PAS), 2015

(<http://www.pas.gov.uk/documents/332612/1099309/Planning+on+Your+Doorstep+---+The+Big+Issues+Green+Belt.pdf/bb5fcd90-fa29-42a0-9dd9-82b27a43f72f>)

- exploring whether other authorities can help to meet some of the identified development requirement.¹⁹

5.11 Should Shropshire Council decide to release land from the Green Belt, it is recommended that outline policy guidance or masterplans are prepared as part of or following on from the Local Plan process. Masterplans should draw on the findings of the Green Belt Assessment and Review and any detailed site-based Green Belt assessment work to indicate precise development areas, new permanent Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments. Such an approach, together with specific policies for the development of the land, would help to minimise harm to the remaining Green Belt.

Safeguarded Land

- 5.12 The Shropshire Core Strategy (2011) currently includes provision of safeguarded land including land reserved at Shifnal and Albrighton (see Settlement Policy S1 (Albrighton Area and Policy S3 (Shifnal area)). However, much of the area of safeguarded land at Shifnal has either been developed or is committed for development. A less extensive area of safeguarded land was identified at Albrighton and a significant proportion of this has also been allocated for development in the Local Plan (SAMDev).
- 5.13 Paragraph 139 of the NPPF indicates that, when defining Green Belt boundaries, Local Planning Authorities should, 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. No further guidance is provided on the circumstances where safeguarded land may be necessary; however Paragraph 136 of the NPPF states that "*Green Belt boundaries should only be altered where exceptional circumstances, are fully evidenced and justified through the preparation and updating of plans*". At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.
- 5.14 Furthermore the penultimate bullet point under Paragraph 139 of the NPPF states that when defining Green Belt boundaries, local authorities should satisfy themselves "*that Green Belt boundaries will not need to be altered at the end of the plan period*". Removing land from the Green Belt and safeguarding it for future potential use offers increased certainty that newly defined Green Belt boundaries will endure beyond the end of the plan period and will not need to be altered again, for some considerable time.
- 5.15 As defined in paragraph 133 of the NPPF 'permanence' is one of the essential characteristics of Green Belt. If Shropshire Council determine to release land from the Green Belt for development, it is recommended that consideration is given to safeguarding land to ensure that decisions to amend Green Belt boundaries will endure beyond the end of the plan period and for some considerable time into the future.

¹⁹ Paragraph 157 on the NPPF.

5.16 Where areas of the Green Belt are identified as being suitable for release in this plan period, parts of them may be retained as safeguarded land. The location of such areas should be informed by this Green Belt Study and the findings of the wider Local Plan review.

LUC

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Appendix 1
Albrighton Assessment

Appendix 2
Alveley Assessment

Appendix 3
Bridgnorth Assessment

Appendix 4
Cosford Assessment

Appendix 5

Junction 3 Assessment

Appendix 6

Junction 4 Assessment

Appendix 7
Shifnal Assessment