

# **Shropshire Council**

## **Green Belt Topic Paper**

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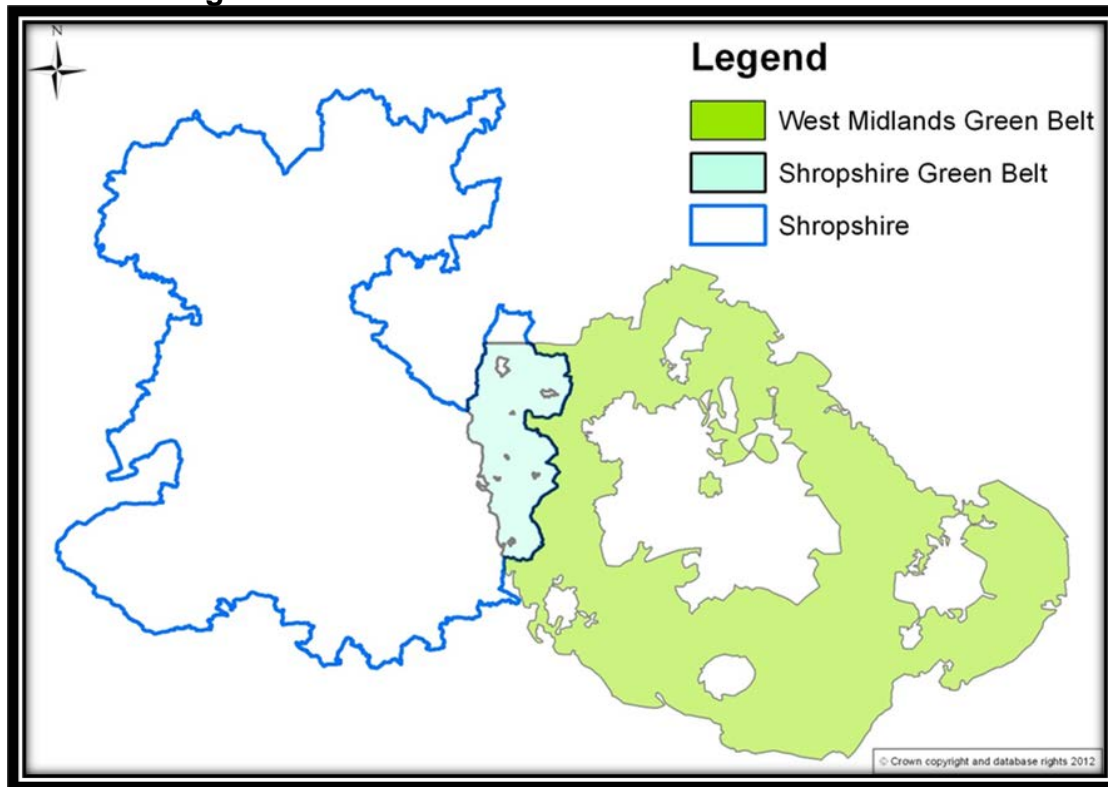
# 1. Introduction

- 1.1. On the 3<sup>rd</sup> November 2021, the Planning Inspectors appointed to undertake the examination of the draft Shropshire Local Plan issued their Initial Questions (ID1).
- 1.2. Paragraphs 19-23 of ID1 related to the Green Belt and requested the preparation of a Green Belt Topic Paper to:
  - a. Explain the steps taken by the Council prior to making the decision to allocate land in the Green Belt for development. This should include reference to relevant parts of the evidence base.
  - b. How it has addressed National Planning Policy Framework (NPPF) paragraph 141 and where necessary, provide evidence to substantiate this.
  - c. Explain whether taking unmet need from the Black Country has led to the need to release land from the Green Belt.
- 1.3. Shropshire Council has prepared this Green Belt Topic Paper in order positively respond to these questions.
- 1.4. Following ID1, the Planning Inspectors issued further Initial Questions (ID2) on the 24<sup>th</sup> November 2021.
- 1.5. Paragraph 25 of ID2 related to the Green Belt and requested a comprehensive breakdown of all alterations proposed to the Green Belt within the draft Shropshire Local Plan. This question is also addressed within this Green Belt Topic Paper.

## 2. Background

- 2.1. The Shropshire Green Belt is on the outer edge of and forms part of the wider West Midlands Green Belt. It encompasses an area in the south east of the County that lies to the east of the River Severn and south of the A5. This is illustrated in Figure 1.

**Figure 1: Location of the West Midlands Green Belt**



- 2.2. The Green Belt in Shropshire covers some 24,500ha of land (around 8% of Shropshire's administrative area). The land within the Green Belt in Shropshire is diverse, it includes extensive areas of countryside, parkland and agricultural land; numerous smaller settlements that are 'washed over' by the Green Belt; significant numbers of isolated dwellings; and a large military facility at RAF Cosford (proposed to be removed from the Green Belt within the draft Shropshire Local Plan).
- 2.3. There are also a number of settlements and areas of built development that are 'inset' within the Green Belt in Shropshire (surrounded by but not located within the Green Belt). Specifically, the settlements of Albrighton, Alveley, Beckbury, Claverley, Shifnal and Worfield; and the Industrial Estates at Alveley and Stanmore. Whilst the settlement of Bridgnorth is enclosed by Green Belt on its eastern side.
- 2.4. The Green Belt in Shropshire was last subject to assessment by Bridgnorth District Council as part of its Local Plan 1996-2011 (adopted in 2006), prior to the creation of Shropshire Council in 2009.
- 2.5. Within the Bridgnorth District Council Local Plan 1996-2011 around 2.7ha of land was removed from the Green Belt for development and around 16ha of land was removed from the Green Belt and safeguarded for future development. No other substantive changes were made to the extent or boundaries of the Green Belt at that time.
- 2.6. It should be noted that safeguarded land was already identified at Shifnal. Furthermore, much of the safeguarded land in both Shifnal and Albrighton has subsequently been subject to allocation/development or is proposed for allocation within the draft Shropshire Local Plan.

### 3. National Planning Policy Framework (NPPF)

- 3.1. National policy on Green Belt is captured in Chapter 13 of the National Planning Policy Framework (NPPF) (July 2021), specifically paragraphs 137-151. Amongst other things, these paragraphs provide information on the overall importance of Green Belts; their characteristics and purposes; and the conditions needed to justify alterations to existing Green Belt boundaries.
- 3.2. It is considered useful to provide an overview of some of the key aspects of National Green Belt policy captured in Chapter 13 of the NPPF, although this is clearly not intended to replicate the full wording of this Chapter.
- 3.3. Paragraph 140 of the NPPF states “*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans...*” This paragraph goes on to state “*...where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*”
- 3.4. Paragraph 141 of the NPPF states “*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development...*” This paragraph goes on to indicate that the any exceptional circumstances argument proposed will be assessed through the examination of strategic policies, which will take into account the considerations set out in paragraph 140 of the NPPF and whether the strategy “*...a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development...; and c) has been informed by discussions with neighbouring authorities...*”
- 3.5. Paragraph 142 of the NPPF states “*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking 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.*”
- 3.6. Paragraph 143 provides specific criteria that should be applied when defining Green Belt boundaries.

## 4. Scope of this Topic Paper

- 4.1. Within ID1, the Inspectors identified the need for further clarity on the Council's methodology regarding reviewing Shropshire's Green Belt Boundaries. Specifically, the Inspectors have sought clarification on the steps taken by the Council prior to making the decision to allocate land in the Green Belt for development, including how the Council has addressed paragraphs 141-143 of the NPPF.
- 4.2. Within ID1, the Inspectors also seek clarification on whether the proposal to seek to accommodate part of the unmet need forecast to arise within the Black Country Authorities administrative area within the draft Shropshire Local Plan has led to the need to release land from the Green Belt.
- 4.3. Within ID2, the Inspectors requested a comprehensive breakdown of all alterations proposed to the Green Belt within the draft Shropshire Local Plan.
- 4.4. Paragraphs 19 to 22 of ID1 provide an overview of a typical methodology used within the context of Local Plan preparation in order to identify if there is a need to review Green Belt boundaries to support the development needs of an area in a sustainable way. This indicates a sequential process, starting with an 'in-principle' decision by the Council that a review of the Green Belt boundary is necessary to help meet development needs in a sustainable way, as set out in the NPPF. Paragraph 21 of ID1 indicates a typical methodological process to follow when determining the need to review Green Belt boundaries.
- 4.5. Once a need to review the Green Belt boundary is established, paragraph 20 of ID1 indicates that the second stage of this process is to determine which site or sites would best meet the identified need having regard to Green Belt harm and other relevant considerations.
- 4.6. Whilst the methodology used by Shropshire Council does not follow precisely that set out in ID1, the Council has nevertheless followed a robust sequential approach which has led to the proposed alterations to Green Belt boundaries in order to support sustainable development. In doing so, the Council considers it has met the requirements set out in the NPPF.
- 4.7. The following sections of this Topic Paper therefore seeks to address these specific questions, outlining firstly the rationale for undertaking a Green Belt Review as part of the Local Plan Review in Shropshire, and secondly the justification for seeking to amend Green Belt boundaries following consideration of all other reasonable options in order to enable a sustainable pattern of development. It then addresses the questions relating to the implications of accepting cross-boundary need from the Black Country and the extent of proposed changes to the Green Belt.

## 5. Overview of the Sequential Approach to the Local Plan Review

5.1. The sequential and iterative approach to the Local Plan Review process undertaken can be summarised as follows:

### SAMDev Plan

-The SAMDev Plan Inspector included a main modification to the SAMDev Plan committing the Local Planning Authority to undertake a Green Belt Review.

### Spatial Strategy for Shropshire

-Shropshire Council developed the over-arching spatial strategy for the level and distribution of development.  
-This involved an iterative process and careful consideration of reasonable alternative options to achieve a sustainable pattern of development which appropriately addresses and responds to development needs and opportunities and the unique characteristics of Shropshire.  
-The process was informed by the careful consideration of best available evidence, extensive consultation and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.  
-A comprehensive summary of this process is provided within the Housing Topic Paper.

### Supporting the role of settlements across Shropshire (1)

- Shropshire Council identified proposed development guidelines for proposed to be identified as Strategic/ Principal/Key Centres and Community Hubs.  
-These proposals were in the context of the proposed spatial strategy for the level and distribution of development, the role of specific settlements within this proposed spatial strategy and more generally in Shropshire, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and the characteristics/constraints/opportunities of specific settlements. This process intrinsically involved consideration of all reasonable alternative options.  
-This process was informed by the careful consideration of best available evidence, extensive consultation and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.  
-A comprehensive summary of this process is provided within the Housing Topic Paper.

### Supporting the role of settlements across Shropshire (2)

-Shropshire Council subsequently where appropriate identified proposed allocations to contribute towards achieving these proposed development guidelines for proposed to be identified as Strategic/ Principal/Key Centres and Community Hubs.  
-This process was informed by the careful consideration of best available evidence, extensive consultation and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.  
-Key evidence in this process are the site assessments which form appendices B-T of the Sustainability Appraisal (**SD006.03 – SD006.21**). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (**SD006.22**). This involved careful consideration of all alternative options/sites including brownfield sites and under-utilised land (Green Belt was given appropriate consideration within this exercise).

### Achieving the long-term needs of settlements across Shropshire

- Shropshire Council considered the longer-term needs of settlements beyond the proposed Plan period.
- Where appropriate, safeguarded land is proposed to be identified. This land is not allocated for development at the present time, but is proposed to be removed from the Green Belt and safeguarded for development beyond the proposed Plan period.
- This provides certainty about the ability to meet the longer-term needs of our communities and about the longevity of proposed Green Belt boundaries.
- This process was informed by the careful consideration of best available evidence, extensive consultation and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.
- Key evidence in this process are the site assessments which form appendices B-T of the Sustainability Appraisal (**SD006.03 – SD006.21**). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (**SD006.22**). This involved careful consideration of all alternative sites (Green Belt was given appropriate consideration within this exercise).

### Consideration of Reasonable Alternative Options and Exceptional Circumstances

- Reflecting the iterative process of the Local Plan Review, where options proposed involved Green Belt release, Shropshire Council carefully considered alternative options and then whether exceptional circumstances existed.
- Where Shropshire Council considered that there were no reasonable alternative options and that exceptional circumstances existed to support proposed Green Belt release, these exceptional circumstances and the means to achieve improvements to the wider Green Belt were identified within a Green Belt Exceptional Circumstances Statement and a subsequent update (**EV051**).

5.2. The process undertaken for the proposed RAF Cosford Strategic Site was comparable to the above, but rather than consideration of supporting the role of settlements, the focus was on supporting the role, vitality and long term sustainability of the existing site and its occupiers.



## 6. SAMDev Plan and the SAMDev Plan Inspectors Report (2015)

- 6.1. The adopted Local Plan for Shropshire consists of the Core Strategy (2011) (**EV009**); Site Allocations and Management of Development (SAMDev) Plan (2015) (**EV010 and SD015**); and any adopted (made) formal Neighbourhood Plans<sup>1</sup>.
- 6.2. The central need for Shropshire Council to undertake a Green Belt Review emanates from the conclusions of the SAMDev Plan Inspectors Report (October 2015), which has been submitted as part of the evidence base for the draft Shropshire Local Plan (**EV010.01**).
- 6.3. The conclusions of Inspector Sherratt are perhaps captured most succinctly in the Non-Technical Summary of **EV010.01**, within which Inspector Sherratt summarises her Main Modifications. The first Main Modification summarised is a “*commitment to an early review of the Local Plan including a detailed review of the Green Belt boundary*” (my emphasis).
- 6.4. Inspector Sherratt goes on to discuss Green Belt in several areas of her report (**EV010.01**). In Paragraph 23 she indicates what the review of the Local Plan should include...“*The review will include housing requirements (including objectively assessed need), employment land requirements, the distribution of development and a review of Green Belt boundaries, as part of the consideration of strategic options to deliver new development in the review plan period which is likely to be 2016-2036. In line with the framework (paragraph 153), a Local Plan can be reviewed “in whole or in part to respond flexibly to changing circumstances”.*” (my emphasis).
- 6.5. Reference to specific Green Belt boundaries is also made within Inspector Sherratt’s consideration of individual settlements. Within her consideration of Bridgnorth for instance, it is recognised that whilst being the second largest of Shropshire’s five market towns, the eastern side of the town is tightly constrained by the West Midlands Green Belt, and that this had “*greatly limited the options available to the town in the SAMDev Plan*”.
- 6.6. This is reflected within the SAMDev Plan (**EV010 and SD015**) which in paragraph 3.48 of the explanation to Policy MD6 states “*A detailed review of the Green Belt boundary will be undertaken in the Local Plan review, as part of looking at sustainable growth options. The review of the Green Belt will use a methodology that is consistent with neighbouring authorities.*”
- 6.7. The Council were therefore under a specific direction, reflected within the adopted Local Plan, to undertake a Green Belt review to inform the draft Shropshire Local Plan. It is therefore this specific decision made in 2015 that provides the evidential basis for the Council to undertake a Green Belt review as part of the Local Plan Review process.
- 6.8. Whilst it is recognised this does not specifically replicate the typical process of decision making outlined in ID1, the Council nevertheless consider this is a fully robust justification for undertaking such a review of Green Belt boundaries as part of the Local Plan Review. Indeed, it is considered given the conclusions of the SAMDev Plan Inspectors Report (**EV010.01**), the Council may not have been able to provide a

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<sup>1</sup> **EV087** provides overarching details on Neighbourhood Planning in Shropshire. **EV083-EV086** are the four adopted Neighbourhood Plans in Shropshire.

justified and appropriate strategy without undertaking such a review of the Green Belt.

- 6.9. It should also be emphasised that before this Green Belt review, the last occasion where the Shropshire Green Belt was reviewed was as part of the Bridgnorth Local Plan (1996-2011), adopted in 2006. Therefore, this is the first occasion the Green Belt has been reviewed since the formation of Shropshire Council in 2009.

## 7. Local Plan Review (2016 – 2038): Process of Reviewing Green Belt Boundaries

### *Shropshire’s Green Belt Evidence Base and Plan-Making Stages*

- 7.1. In undertaking the review of the Shropshire Green Belt, full regard has been had of national policy, including in relation to Green Belt.
- 7.2. In seeking to positively respond to the commitment made within the SAMDev Plan, (based on the main modification required by the SAMDev Plan Inspector), as part of the Local Plan Review process Shropshire Council has undertaken a Green Belt Assessment and Green Belt Review. These documents form part of the wider evidence base prepared to inform the draft Shropshire Local Plan.
- 7.3. At an appropriate stage within the Local Plan Review process, Shropshire Council has also prepared a Green Belt Exceptional Circumstances Statement (subsequently updated).
- 7.4. In summary, the Council’s evidence base relating to the Green Belt is primarily captured in the following documents available in the Examination Library:
  - a. Green Belt Assessment (Sept 2017) – **EV049**
  - b. Green Belt Assessment Figures 4-1 to 4-5 (Sept 2017) - **EV049.02**
  - c. Green Belt Review (Nov 2018) – **EV050.01**
  - d. Green Belt Review Appendices 1-7 (Nov 2018) – **EV050.02 to EV050.08**
  - e. Green Belt Revised Exceptional Circumstances Statement (Dec 2018) – **EV051**
- 7.5. Reflecting the iterative process of the Local Plan Review, these evidence base documents were prepared, so that they were available to inform the appropriate stages of the development of the draft Shropshire Local Plan. Table 1 below provides an overview of when the Council’s Green Belt evidence was prepared in the context of the stages of preparation of the draft Shropshire Local Plan:

**Table 1: Green Belt Evidence Base Stages**

<b>Evidence base</b>	<b>Stage of Local Plan Preparation</b>
	Reg 18 Issues and Strategic Options - January 2017
Green Belt Assessment – September 2017 (LUC)	
	Reg 18 Preferred Scale and Distribution of Growth – October 2017
Green Belt Review – November 2018 (LUC)	
	Reg 18 Preferred Sites – November 2018
	Reg 18 Strategic Sites – July 2019
Duty to Cooperate Formal Letter Regarding Potential for Green Belt Release – February 2020	
Exceptional Circumstances Statement – August 2020	Reg 18 Pre-Submission – August 2020
Revised Exceptional Circumstances Statement – December 2020	Reg 19 Pre-Submission – December 2020

- 7.6. However, as is evident from the submission documentation an extensive, wider evidence base has informed the proposals within the draft Shropshire Local Plan, including in relation to the approach to Green Belt. Those documents which are particularly pertinent to the issue of Green Belt, include:
- a. The Hierarchy of Settlements Assessment (2020) – **EV060**
  - b. The Local Housing Need Assessment (2020) – **EV069**
  - c. Part 1 and Part 2 of the Strategic Housing Market Assessment (both 2020) – **EV097.01** and **EV097.02**
  - d. The Economic Development Needs Assessment (2021) – **EV043**
  - e. The Employment Land Review (2019) – **EV046**
  - f. The Site Assessment material which considers the suitability, availability and achievability (including viability) of potential development sites and form appendices B-T of the Sustainability Appraisal (**SD006.03 – SD006.21**). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (**SD006.22**).
- 7.7. Whilst the Council's evidence base should ideally be read as a whole, the following provides an overview of the key aspects of the various Green Belt specific documents, including their main purpose within the wider context of Plan making.

### ***Overview of the Green Belt Studies***

- 7.8. As established above, the primary motivation for undertaking a Green Belt Review as part of the wider Local Plan Review process was the main modification required by the SAMDev Plan Inspector and the subsequent commitment within the SAMDev Plan to undertake this work.
- 7.9. However, at the outset of the Local Plan Review, Shropshire Council identified the need for an up to date and detailed assessment of the Green Belt to first be undertaken (in tandem with the preparation of the wider evidence base and alongside the testing and exploration of options for achieving an appropriate spatial strategy for achieving the sustainable development of Shropshire), which could then directly inform the subsequent Green Belt Review.
- 7.10. It was subsequently identified that any Green Belt Review would need to consider the particular role of Green Belt in Shropshire, as part of the strategic designation around the West Midlands conurbation, which nevertheless accommodates significant sites and settlements in Shropshire that may need to be considered in the preparation of the Local Plan Review.
- 7.11. Recognising the specialist requirements of both Green Belt Assessment and Review, a decision was taken to appoint suitably qualified and experienced consultants with a tried and tested methodology to undertake this work. The initial brief for the study reflected the early stage in plan development, and the geographical focus and requirements were refined as the proposed spatial strategy and wider evidence base were developed.
- 7.12. However, it was not intended that either the Green Belt Assessment or Review should make explicit recommendations about the release of land from the Green Belt. Rather, that they would help to provide detailed information on the role of the Green Belt in Shropshire and the harm that would result to the Green Belt as a result of release.

7.13. In this way they could help to identify where potential opportunities existed to revise Green Belt boundaries if this was later found to be specifically required in order to facilitate the sustainable development of Shropshire by supporting the proposed spatial strategy for the level and distribution of development, the role of specific settlements within the context of this proposed spatial strategy and more generally in Shropshire, ensure the long term vitality and sustainability of communities, and respond to the characteristics/constraints/opportunities of specific settlements.

### **Green Belt Assessment – September 2017 (LUC)**

- 7.14. Land Use Consultants (LUC) were commissioned to undertake a Green Belt Assessment in 2016, in order to assess the extent to which land within the Shropshire Green Belt (part of the wider West Midlands Green Belt) performed against the purposes of Green Belt as set out in Paragraph 138 of the NPPF, namely:
- a. to check the unrestricted sprawl of large built-up areas;
  - b. to prevent neighbouring towns merging into one another;
  - c. to assist in safeguarding the countryside from encroachment;
  - d. to preserve the setting and special character of historic towns; and
  - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 7.15. The overall aim for this assessment was to achieve an objective, evidence-based, and independent assessment of how the Shropshire Green Belt contributes to the five Green Belt purposes, as set out in national policy.
- 7.16. Underlying its value as a piece of evidence is the robust assessment methodology which has had due regard to relevant planning policy and guidance, work progressing in neighbouring authorities, relevant case law and Local Plan Examinations, and other best practice. The resulting methodology, including assessment criteria (together with the assessment outcomes) are available and clearly laid out in the Green Belt Assessment Report (**EV049.01** and **EV049.2**).
- 7.17. Furthermore, the assessment was informed by feedback from Duty to Cooperate engagement, informed by specific consultation on the proposed methodology. Notably LUC had already undertaken Green Belt Studies for other West Midlands Authorities, including an update in South Staffordshire in 2016 and a full Green Belt review for a group of West Midlands Authorities in 2015 and 2016, providing familiarity with the West Midlands Green Belt and its constituent local authorities, and allowing for consistency of approach.
- 7.18. LUC were also able to draw on the resources of an experienced, multidisciplinary team to carry out the required work, with initial research and desk based assessments being verified by field work.
- 7.19. The Assessment evaluated the Green Belt across Shropshire but appropriately it also had regard to the broader role of the Green Belt and considered influences-beyond the Shropshire boundary for example, the interrelationship with Telford as a 'large built up area in the Shropshire context' (purpose 1) and neighbouring town (purpose 2) with historic settlements (purpose 4).
- 7.20. The assessment findings are presented at two scales. Firstly, an overview of the strategic performance of the Green Belt within Shropshire, which takes into account the role and function of the Green Belt within Shropshire as a whole and as part of

the much larger West Midlands Green Belt. Secondly, a summary of the findings for the individual parcels assessed.

- 7.21. In recognition that the NPPF does not require all purposes of Green Belt to be met at the same time and that parcels can still make a significant contribution to the Green Belt purposes without performing all of the purposes of the Green Belt, there is no overall score for each parcel. It is also made clear that just because a parcel is considered perform less well against the purposes of the Green Belt that it should not automatically be removed from the Green Belt.
- 7.22. The Assessment only considers the relative performance of the Green Belt; it does not consider and was not intended to consider the exceptional circumstances required to demonstrate the need for Green Belt release, or the range of other constraints that may inhibit sustainable development e.g. ecological, archaeological, infrastructure, social and economic constraints.
- 7.23. It is notable that in the context of making changes to the 'Green Belt', the assessment highlights that in order to develop 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, whether these needs can be accommodated without releases from the Green Belt. These considerations should be balanced against an assessment of whether the release of land from the Green Belt would provide sustainable development options that have significant potential to attract investment and stimulate growth and which are not available in other areas of the County"*.

### **Green Belt Review – November 2018 (LUC)**

- 7.24. LUC was subsequently commissioned by Shropshire Council to undertake a follow-on Stage 2 Green Belt Review assessing the potential harm of releasing areas of potential development opportunity 'Opportunity Areas', from the Green Belt.
- 7.25. Whilst the purpose of a Green Belt Assessment was to assess the relative performance of the Green Belt against the purposes identified within the NPPF, the Green Belt Review specifically considered what adjustments could be made to the Green Belt. To do so the Review looked at the potential for areas to be removed or added to the Green Belt, either to recognise the urbanised character of the land, to safeguard land to satisfy future needs, or to consider land for development, including to help Shropshire Council to consider proposals advanced to them for development in the Green Belt.
- 7.26. The Green Belt Review therefore required judgements to be made about the implications of removing land from the Green Belt taking into account the impact on the integrity of the remaining Green Belt land and the strength of revised Green Belt boundaries. These judgements needed to be informed by an assessment of the performance of the Green Belt.
- 7.27. As such, the outcomes of the Green Belt Assessment, together with other evidence and policy development laid the basis for the second stage assessment, a Green Belt Review, which was undertaken using a methodology complementary and consistent with that for the Green Belt Assessment.
- 7.28. The Green Belt Review focused on strategic locations including settlements identified as potential Strategic/Principal/Key Centres or Community Hubs within/adjoining the Green Belt and other potential strategic sites in the Green Belt.

- 7.29. The aim of the Green Belt Review was to undertake an independent, robust and transparent assessment of the potential harm of releasing Green Belt land within the areas of interest identified. Consideration of the harm to Green Belt that could result from the release of land for development was identified as one essential aspect of establishing the exceptional circumstances for making alterations to Green Belt boundaries.
- 7.30. Green Belt Review looked in greater detail at 29 'Opportunity Areas' around the existing settlements of Albrighton, Alveley, Bridgnorth and Shifnal, as well as around RAF Cosford /Cosford village, and Junctions 3 and 4 of the M54 motorway in order to support the consideration of a range of options meet development needs over the Plan period and beyond and to help consider proposals which had been advanced.
- 7.31. 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 parcels at each identified location. The assessment of the potential degree of 'harm' that may occur if selected parcels and Opportunity Areas were to be released from the Green Belt took 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. With the detailed considerations informing the assessment clearly defined within the Green Belt Review document
- 7.32. The likely environmental and other effects of development in the Green Belt, such as impacts on landscape quality, biodiversity, heritage and consideration of flooding, traffic generation, infrastructure requirements etc were not taken into account as part of the Review on the understanding that these important matters would be considered and evidenced separately by Shropshire Council, alongside the consideration of exceptional circumstances.

### **Duty to Cooperate including Formal Letter Regarding Potential for Green Belt Release – February 2020**

- 7.33. Legislation requires Council's preparing Local Plans to undertake a 'duty to cooperate' and makes it a legal requirement for Council's and statutory bodies to work together on strategic cross-boundary issues. This is reinforced by the NPPF in paragraphs 24-27 which set out expectations for effective cooperation. It is also reflected in the NPPF tests of soundness for examining Local Plans (para 35), in particular the tests of being 'positively prepared' and 'effective'. Whilst the 'positively prepared' requirement highlights the need to accommodate evidenced unmet need from neighbouring areas "*where it is practical to do so and is consistent with achieving sustainable development*"; the latter test expects effective joint working on cross-boundary strategic matters should have been dealt with and documented by statements of common ground.
- 7.34. In relation to alterations to the Green Belt, paragraph 141 of the NPPF sets out an expectation that all "*other reasonable options for meeting its identified need for development proposals*" have been fully considered and that it can be demonstrated that proposed approach has "*been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development*".
- 7.35. The Shropshire Council administrative area is adjoined by the following Local Planning Authorities: Telford and Wrekin, Cheshire West and Chester, Cheshire East, Wrexham, Powys, Herefordshire, Malvern Hills, Wyre Forest, South Staffordshire, Stafford Borough, and Newcastle Under Lyme. It is also adjoined by Worcestershire and Staffordshire County Councils.

- 7.36. In addition to the adjoining Local Planning Authorities, there are also Local Planning Authorities that have a functional relationship with Shropshire, most notably the Black Country Authorities (consisting of Dudley, Sandwell, Walsall and Wolverhampton Local Planning Authorities).
- 7.37. Effective and on-going joint working between strategic policy-making authorities is recognised by the Council as an important part of plan-making and has been embedded in the Local Plan Review process. Positive conversations with relevant bodies have been ongoing over the course of the preparation of the draft Shropshire Local Plan and have where appropriate been documented for the purposes of Examination within a series of Statements of Common Ground (**EV021 – EV041**), submitted as part of the Council's evidence base.
- 7.38. Further to discussions with the Black Country Authorities as part of their ongoing plan making process, Shropshire Council is proposing to support the development capacity of the Black Country Authorities by accommodating part of the 'unmet' housing and employment needs forecast to arise between 2020 and 2039 within their administrative areas. This reflects a positive approach to cross boundary cooperation, in line with NPPF, and responds to the functional relationship between the two areas.
- 7.39. In addition to considering its capacity to support the Black Country in addressing unmet need, Shropshire has had to consider how its own sustainable growth needs to 2038 will be met. The development of the strategy for the level and distribution of development in Shropshire, together with specific proposals, is summarised in the subsequent sections of this Topic Paper which provide an overview of the various stages of consultation undertaken as part of the Local Plan Review.
- 7.40. It had already been highlighted, through the examination of the SAMDev Plan, that the Green Belt designation although not present across the whole of Shropshire, significantly constrained the growth potential of a number of settlements and locations in east Shropshire. This issue was further exacerbated in Shifnal and Albrighton as areas of Safeguarded Land were brought forward within the SAMDev Plan for development, further reducing the future non-Green Belt land options for site allocations in these settlements.
- 7.41. It became evident as the Local Plan Review progressed that this impacted on the ability to promote a sustainable pattern of development across Shropshire which adequately addressed development needs and opportunities (including the strategic economic importance of the east of the county, particularly the M54 corridor). It also impacted on the ability to support the role of specific settlements within the context of this proposed spatial strategy and more generally in Shropshire and the ability to support the long term vitality and sustainability of communities in geographically specific areas.
- 7.42. Reflecting these considerations, the proposed spatial strategy for the level and distribution of development and specific proposals for development guidelines for settlements within the Green Belt does propose that the majority of the residential and employment development will be distributed to locations outside the Green Belt, but also seeks to provide opportunities for future development in specific locations within the Green Belt. This proposed spatial strategy has been developed through an iterative process, involving a series of Regulation 18 'Plan-Making' consultations. It also formed a specific matter for Duty to Cooperate discussions.
- 7.43. On this basis, in February 2020, a letter was sent to adjoining Local Authorities regarding potential Green Belt release in Shropshire. A copy of this letter which was



sent by email to the adjoining Local Authorities was included as Appendix 1 of the Exceptional Circumstances Statement (**EV051**). This letter identified the circumstances which have resulted in a Green Belt review in connection with the Local Plan review and identified that some growth was proposed within settlements inset and on the edge of the Green Belt. It specifically described the growth proposals at Albrighton, Alveley, Bridgnorth and Shifnal, together with strategic sites within the Green Belt (which were also set out in the Preferred Sites and Strategic sites consultations) making clear the rationale for proposals in each location.

- 7.44. Mindful of NPPF requirements, the letter to adjoining Local Authorities asked whether there was suitable, available and deliverable land within their area which would be able to functionally serve the geographical location(s) (i.e. Bridgnorth, Albrighton, Shifnal, Alveley and RAF Cosford) and strategic purposes identified. They were also asked if they were able to assist, how much of the preferred option development requirements could be sustainably accommodated, where and by what mechanism(s).
- 7.45. No Local Authorities responded indicating that they had such opportunities. Explanatory comments however highlighted a range of issues impacting on the ability to meet need such as: significant distance from the locations identified and related sustainability issues; lack of correlation in functional economic and/or housing market areas; mismatch in timings of plan preparation; own need for Green Belt release to meet future housing need and other constraints and challenges in meeting own housing need.

### ***Overview of the Local Plan Review Process***

- 7.46. Shropshire Council has undertaken an iterative process in order to develop the proposed vision, objectives, spatial strategy, policies, site allocations and other proposals within the draft Shropshire Local Plan.
- 7.47. This iterative process has been informed by careful consideration of best available evidence, technical assessments and extensive consultation. It is reflected in the various stages of consultation which have 'built up' to the preparation of a full formed version of the draft Shropshire Local Plan.

### **Regulation 18 Issues and Strategic Options – January 2017 (EV003.01)**

- 7.48. This was a first high-level consultation, reflecting initial evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, national policy and guidance, the principles of sustainable development, and potential policy objectives. It was also informed by technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.
- 7.49. It considered and presented reasonable options for the housing requirement; strategic distribution of future growth; strategies for employment growth; and the delivery of development in rural settlements.
- 7.50. The need to reconsider the older strategic element of the adopted Local Plan (the Core Strategy), together with specific recommendations in the SAMDev Plan (including those such as the need to undertake a Green Belt Review, which were included based on main modifications required by the SAMDev Inspector) set the main context for this stage of the Local Plan Review process.

7.51. In relation to housing, the consultation invited feedback on the:

- a. The level of residential development – setting out a range of potential growth options against evidenced need requirements and previous growth:
  - Option 1. Moderate Growth - 26,250 dwellings
  - Option 2. Significant Growth 27,500 dwellings
  - Option 3. High Growth 28,750 dwellings
- b. Strategic distribution of residential development – setting out different options (illustrated by the table below) for how growth could be distributed between general categories of settlement.

<b>Option</b>	<b>Strategic Distribution</b>	<b>Provision</b>	<b>Split of housing requirement</b>
<b>A</b>	'Current Policy - Rural Rebalance'	Continuation of the existing strategic approach	Shrewsbury – 25% Market Towns and Key Centres (17) – 40% Rural Area – 35%
<b>B</b>	Urban Focus	Greater focus for growth around Shrewsbury and the market towns and key centres, with around 75% of growth to these areas	Shrewsbury – 30% Market Towns and Key Centres (17) – 45% Rural Area – 25%
<b>C</b>	Balanced Growth	Middle ground between Options A & B, balancing needs and opportunities across the urban and rural areas	Shrewsbury – 30% Market Towns and Key Centres (17) – 40% Rural Area – 30%

7.52. In relation to employment development, the consultation sought to draw out how best to exploit identified new investment opportunities and identify appropriate Strategies for employment growth and performance, setting out three potential strategic options for economic growth:

- a. Option 1: Significant Growth- continues the current strategic approach and rolling forward the existing employment land requirement to 2036 to provide a comparable level of employment land to that in the current Plan.
- b. Option 2: High Growth- revised approach aiming to support a higher level of aspiration with an appropriate employment land requirement, providing a higher level of employment land supply.
- c. Option 3: Productivity Growth - a new strategic approach for 2016 to 2036 to capture the new investment potential and to seek to influence the structure of the economy, the productivity of its sectors and the range, type and quality of new employment. This option focused on an aspiration to provide more 'higher value' jobs with potentially a lower employment land requirement.

7.53. Whilst considering the success of the existing strategy, with employment land delivery and commitments from the adopted Local Plan as a baseline (together with other evidence) to help inform the consideration of strategic options, the Growth Options identified did not at that time identify specific amounts of employment land or propose potential spatial distributions in the same way as for housing. The consultation sought to more broadly draw out the challenges and opportunities of achieving economic growth and the desirable and other potential impacts of any approach selected.

- 7.54. In conjunction with asking which of the Strategic Options, or alternative, would provide the most appropriate level of aspiration for the growth of the Shropshire and why, the consultation also identified the importance of underlying strategic objectives. Recognising that overall strategic objectives influence the employment land requirement (including scale, range and choice of land) and its distribution, the consultation sought to establish whether it was considered that current Economic Strategic Objectives for Shropshire set out in the adopted Local Plan remained appropriate.
- 7.55. Whilst a series of more detailed questions were asked as part of the consultation, including in respect of the contribution undeveloped allocations and existing employment areas to the employment land supply, it is evident that the focus was to establish a basis for an overall strategic approach as a foundation for future proposals. There was no reference to release of Green Belt to realise economic objectives only a recognition of the investment opportunities coming from the West Midlands region and demand expressed at key locations in the east of the County.
- 7.56. The consultation also included proposals for the development of rural and countryside Policy and provided an initial methodology for undertaking 'Hierarchy of Settlements' Assessment to provide an understanding of settlements and their function, particularly rural settlements. As such, its conclusions would inform and support the approach to distribution of development across the County.
- 7.57. Green Belt was referenced in relation to the review of the Green Belt being undertaken and the intention to develop appropriate policy, but there were no specific proposals at this stage, other than in association with the continued development of a spatial strategy for the level and distribution of development and the associated consideration of the role of any settlements in designated Green Belt (as elsewhere) in the context of any proposals and through the application of 'Hierarchy of Settlements' Assessment.

### **Regulation 18 Preferred Scale and Distribution of Growth – October 2017 (EV004.01)**

- 7.58. The purpose of this phase of plan preparation and consultation was to establish the Council's preferred approach to the scale and broad distribution of growth, following consultation on the Issues and Strategic Options in January 2017. These proposals were informed by the careful consideration of best available evidence, consideration of responses to the previous Issues and Strategic Options Consultation and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.
- 7.59. At this stage the Council was not seeking to identify any specific site options and no Green Belt release was proposed or exceptional circumstances advanced.
- 7.60. This stage was however important in establishing the preferred spatial strategy for the level and distribution of development for the County, supported by evidence derived from the initial draft of the Hierarchy of Settlements (HoS) (subsequently updated and in its latest form is included in the Examination Library, ref **EV060**). The HoS applies a consistent methodology in order to establish the broad sustainability of a full range of settlements in Shropshire.
- 7.61. Specifically, the proposed 'high level structure' to the distribution of development was underpinned by the principle of urban focus, by which the majority of development was directed towards urban areas. This included around 30% of development in

Shrewsbury (the proposed Strategic Centre); around 24.5% of development within proposed Principal Centres; around 18% of development within proposed Key Centres; and around 27.5% of development in rural areas (including proposed Community Hubs and proposed Community Clusters). This was considered to represent a sustainable pattern of development which also responded to development needs and opportunities (including the strategic economic importance of the east of the county, particularly the M54 corridor) and the unique characteristics of Shropshire.

- 7.62. It also identified proposed residential and employment requirements for Shropshire and proposed residential and employment development guidelines for proposed Strategic, Principal and Key Centres.
- 7.63. These proposed development guidelines were in the context of the proposed spatial strategy for the level and distribution of development, the role of specific settlements within this proposed spatial strategy and more generally in Shropshire, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and the characteristics/constraints/opportunities of specific settlements. This process therefore intrinsically involved consideration of all reasonable alternative options.
- 7.64. In the context of the proposed spatial strategy, we would note that paragraph 142 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 policymaking 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.”*

### **Regulation 18 Preferred Sites Consultation – November 2018 (EV005.01)**

- 7.65. This phase of plan preparation and consultation sought to establish development guidelines for Shrewsbury, Principal and Key Centres and each proposed Community Hub. It also identified a proposed development boundary and the preferred sites to deliver the preferred scale and distribution of housing and employment growth.
- 7.66. Proposals were informed by the careful consideration of best available evidence, early engagement with Town and Parish Councils, consideration of responses to the two previous stages of consultation and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.
- 7.67. The proposed development guidelines and subsequent proposed allocations were in the context of the proposed spatial strategy for the level and distribution of development, the role of specific settlements within this proposed spatial strategy and more generally in Shropshire, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and the characteristics/constraints/opportunities of specific settlements. This process therefore intrinsically involved consideration of all reasonable alternative options.

- 7.68. The preferred sites were particularly informed by an extensive site assessment exercise and Sustainability Appraisal (subsequently updated and forms appendices B-T of the Sustainability Appraisal (SD006.03 – SD006.21). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (SD006.22).
- 7.69. This assessment involved careful consideration of all alternative options/sites for a settlement, including where available brownfield sites and under-utilised land. It also considered opportunities to ensure the effective use of land and maximise site density. Green Belt was also given specific and appropriate consideration within this exercise.
- 7.70. The site assessment process was informed by consideration of any available supporting information provided by site promoters.
- 7.71. Ultimately as a result of the site assessment process, a number of proposed allocations were identified within the Green Belt for residential and employment development.
- 7.72. Furthermore, consistent with paragraph 143(e) of the NPPF which states in the context of defining Green Belt boundaries “...*be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period...*”, in order to provide certainty about the ability to meet the longer-term needs of our communities and about the longevity of proposed Green Belt boundaries, further safeguarded land was also proposed in association with a number of settlements.
- 7.73. Where Green Belt release was proposed to facilitate proposed allocations / safeguarded land, the need to identify exceptional circumstances was acknowledged within the consultation document, however given that proposals could be subject to change and further stages of consultation were intended, it was not considered necessary or appropriate to identify specific exceptional circumstances at this stage.

### **Regulation 18 Strategic Sites Consultation – July 2019 (EV006.01)**

- 7.74. Building on the previous stage of consultation which focused on development associated with settlements, this fourth stage of consultation focused on a series of potential strategic sites which had been identified across Shropshire.
- 7.75. Proposals were informed by the careful consideration of best available evidence, consideration of responses to the previous stages of consultation and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.
- 7.76. Similar to the preferred sites associated with existing settlements, the strategic sites were informed by an extensive site assessment exercise and Sustainability Appraisal (subsequently updated and forms appendix T of the Sustainability Appraisal (SD006.03 – SD006.21). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (SD006.22).
- 7.77. The assessment process considered the potential of sites to contribute to strategic objectives, including to achieving the Shropshire Economic Growth Strategy. It also involved careful consideration of all alternative options/sites including where available brownfield sites and under-utilised land. In addition, it considered opportunities to ensure the effective use of land and maximise site density. Green Belt was also given appropriate consideration within this exercise.

- 7.78. The site assessment process was informed by consideration of any supporting information provided by strategic site promoters, including initial infrastructure capacity assessments and indicative masterplanning.
- 7.79. Responses to this consultation, alongside the information gathered as part of the evidence base to inform the ongoing Local Plan Review and technical assessments (which both informed and appraised proposals) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment, informed the decision as to whether or not potential strategic sites would be taken forward as preferred strategic sites/settlements.
- 7.80. The strategic sites/settlements identified within this consultation that are now included in the Draft Local Plan, are: S19. Clive Barracks, Tern Hill; S20. Former Ironbridge Power Station; and S21. RAF Cosford. Of these sites, only RAF Cosford lies within the Green Belt.
- 7.81. In respect of RAF Cosford, the proposed release from the Green Belt was in the context of supporting the role, vitality and long term sustainability of the existing site and its occupiers. The consultation documentation set out a detailed overview of the future proposals, identified strategic benefits and opportunities in relation to the existing site and uses; and also identified other issues and considerations with specific reference to the relevant outcomes of the Green Belt Assessment and Review and the need to demonstrate robust 'exceptional circumstances'.
- 7.82. With regard to RAF Cosford, we would note that alongside these wider considerations, paragraph 143(b) of the NPPF is relevant, stating in the context of defining Green Belt boundaries "...not include land which it is unnecessary to keep permanently open...".
- 7.83. Where Green Belt release was proposed to facilitate proposed allocations, the need to identify exceptional circumstances was again acknowledged within the consultation document, however given that proposals could be subject to change and further stages of consultation were intended, it was not considered necessary or appropriate to identify specific exceptional circumstances at this stage.

### **Regulation 18 Pre-Submission Draft Local Plan – August 2020 (EV007.01)**

- 7.84. The Regulation 18 Pre-Submission Draft Local Plan consisted of a fully formed version of the draft Shropshire Local Plan, informed by the various stages of plan making undertaken prior to this point. It identified a draft vision and draft framework for the future development of Shropshire to 2038, addressing such issues as the needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seeks to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.
- 7.85. Proposals within this document were informed by careful consideration of all the consultation responses received to previous stages of consultation, best available evidence, the wider policy objectives, and other relevant information available. Additionally, further Sustainability Appraisal, Habitats Regulations Assessment, and Equality and Social Inclusion Impact Assessment were undertaken to both inform and appraise proposals.
- 7.86. The resultant proposed spatial strategy for the level and distribution of development involved an 'urban focus' within which the majority of development would be directed towards urban areas. This 'urban focus' included the proposed Strategic, Principal and Key Centres. It also included the proposed Strategic Settlements and Strategic

Sites (particularly informed by the earlier 'Strategic Sites' consultation). This is complemented by appropriate new development within the rural area (with Community Hubs and to a lesser extent Community Clusters the focus for this development).

- 7.87. This spatial strategy was directly informed by the iterative Local Plan Review process undertaken, which considered reasonable options to achieve a sustainable pattern of development which appropriately addresses and responds to development needs and opportunities (including the strategic economic importance of the east of the county, particularly the M54 corridor) and the unique characteristics of Shropshire.
- 7.88. The proposed development guidelines and subsequent proposed allocations were in the context of the proposed spatial strategy for the level and distribution of development, the role of specific settlements within this proposed spatial strategy and more generally in Shropshire, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and the characteristics/constraints/opportunities of specific settlements. This process therefore intrinsically involved consideration of all reasonable alternative options.
- 7.89. The proposed allocations to contribute to achieving the proposed development guidelines were particularly informed by an extensive site assessment exercise and Sustainability Appraisal (subsequently updated and forms appendices B-T of the Sustainability Appraisal (SD006.03 – SD006.21). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (SD006.22).
- 7.90. This assessment involved careful consideration of all alternative options/sites for a settlement, including where available brownfield sites and under-utilised land. It also considered opportunities to ensure the effective use of land and maximise site density. Green Belt was also given specific and appropriate consideration within this exercise.
- 7.91. Ultimately as a result of the site assessment process, a number of proposed allocations were identified within the Green Belt for residential and employment development. Although as a result of consideration of information provided through and subsequent to this consultation and other evidence considered through an updated site assessment, a number of proposed allocations within the Green Belt were removed in favour of alternative sites.
- 7.92. Furthermore, consistent with paragraph 143(e) of the NPPF which states in the context of defining Green Belt boundaries “...*be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period...*”, in order to provide certainty about the ability to meet the longer-term needs of our communities and about the longevity of proposed Green Belt boundaries, further safeguarded land was also proposed in association with a number of settlements.
- 7.93. A strategic site was also proposed to be identified and removed from the Green Belt. This proposed Strategic site consisted of parts of the existing RAF Cosford site and an additional area of land adjoining the existing RAF Cosford site specifically to accommodate the Midlands Air Ambulance Charity headquarters,
- 7.94. RAF Cosford is a military base and airfield located wholly in the Green Belt, to the north west of Albrighton. The site is also occupied by the Midlands Air Ambulance Charity, West Midlands Police and the renowned RAF Museum Cosford, as such the site includes extensive areas of existing development and associated land.

- 7.95. It was considered that the removal of the identified areas of land at RAF Cosford from the Green Belt and identification of it as a Strategic Site is the most effective means of facilitating military and charitable activities upon the site and positively respond to the sites current status as a major developed site within the Green Belt. Draft guidelines within the draft Shropshire Local Plan would allow for appropriate the intensification of existing and appropriate new development within the extent of the proposed Strategic Sites.
- 7.96. With regard to RAF Cosford, we would note that alongside wider considerations, paragraph 143(b) of the NPPF is also relevant, stating in the context of defining Green Belt boundaries “...not include land which it is unnecessary to keep permanently open...”.
- 7.97. Given that this consultation involved a fully formed version of the draft Shropshire Local Plan, an Exceptional Circumstances Statement (subsequently updated) was prepared to support and inform proposed Green Belt release.

### **Regulation 19 Pre-Submission Draft Local Plan – August 2020 (SD002)**

- 7.98. The Regulation 19 Pre-Submission Draft Local Plan again consisted of a fully formed version of the draft Shropshire Local Plan, informed by the various stages of plan making undertaken prior to this point. It identified a draft vision and draft framework for the future development of Shropshire to 2038, addressing such issues as the needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seeks to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.
- 7.99. Proposals within this document were informed by careful consideration of all the consultation responses received to previous stages of consultation, best available evidence, the wider policy objectives, and other relevant information available. Additionally, further Sustainability Appraisal, Habitats Regulations Assessment, and Equality and Social Inclusion Impact Assessment were undertaken to both inform and appraise proposals.
- 7.100. The proposed spatial strategy, development guidelines and proposed allocations in the context of the Green Belt were generally comparable to that in the previous stage of consultation, with the exception of changes to the extent of the RAF Cosford site to respond to increased certainty on the extent of proposals associated with the proposed Midlands Air Ambulance Charity Headquarters (which resulted in a reduction of the proposed release of land from the Green Belt in this location).
- 7.101. With regard to the Midlands Air Ambulance Charity headquarters, it should be noted that Full Planning Permission (20/04521/FUL) was granted on the 19<sup>th</sup> January 2021 for its construction on the relevant element of the proposed RAF Cosford Strategic Site. Construction subsequently commenced on the 3<sup>rd</sup> March 2021.

The Green Belt Exceptional Circumstances Statement was updated to support this consultation (EV051).



## 8. Justification for Amending Green Belt Boundaries

### Overview

- 8.1. It is fully recognised that the act of undertaking Green Belt Assessment and Review does not by definition lead to the need to make modifications to Green Belt boundaries. To this end the Council has had full acknowledgment of the need to comply with the requirements of the NPPF, most notably paragraphs 140-143, before concluding that Exceptional Circumstances apply. The Council's Exceptional Circumstances Statement (**EV051**) captures this process and is summarised below:

### Rationale for Green Belt Release

- 8.2. The central rationale for the Local Plan's proposals to release land from the Shropshire Green Belt to accommodate development relates to the ability of the Council to achieve its preferred spatial pattern of growth, which seeks to deliver an urban focussed approach to the distribution of development, taking into account sustainability considerations. This relates to both proposed development within the proposed Plan period to 2038, but also reflecting on the need to safeguard land between the urban area and the Green Belt in order to meet the longer term development needs beyond the proposed Plan period. In doing so, the Council feels it meets the requirements of paragraphs 142 and 143 of the NPPF.
- 8.3. It is useful to refer to the Council's Strategic Approach to development, primarily captured within draft Policy SP2 – Strategic Approach but which is then expanded upon within wider draft Strategic Policies of the draft Local Plan, namely:
- SP7 - Managing Housing Development;
  - SP8 - Managing Development in Community Hubs;
  - SP10 - Managing Development in the Countryside;
  - SP11 - Green Belt and Safeguarded Land;
  - SP12 - Shropshire Economic Growth Strategy; and
  - SP14 - Strategic Corridors.
- 8.4. These draft Strategic Policies encapsulate the conclusions of the Preferred Scale and Distribution of Development document, consulted on at the Regulation 18 stage of plan preparation in October 2017. In particular, they capture the Plan's approach to deliver an 'Urban Focussed' strategy, supporting the delivering of the majority of development in Shropshire's network of Strategic, Principal and Key Centres with the greatest access to a range of services and facilities supporting both the resident community and those within the settlement's hinterland. It is also considered this strategy allows the greatest opportunity to deliver a 'step change' in the capacity and productivity of the local economy, promoted through the Council's Economic Growth Strategy.
- 8.5. Draft policy SP2 (5) states:
- "to achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focussed in the urban areas identified in Schedule SP2.1"*
- 8.6. Schedule SP2.1 includes several settlements currently constrained by Green Belt, namely: Bridgnorth (Principal Centre); Albrighton (Key Centre); Shifnal (Key Centre) and RAF Cosford (Strategic Site).

8.7. Draft Policy SP2 (6) states:

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

8.8. Schedule SP2.2 includes the settlement of Alveley which is currently constrained by Green Belt.

8.9. The preferred growth strategy set out in draft Policy SP2 is supported by the Council’s Hierarchy of Settlements (HoS) document (**EV060**), which assessed settlements in Shropshire against their accessibility to a range of services and facilities. The strategy also reflected the considerations of earlier stages of plan preparation and consultation, including the Issues and Strategic Options (January 2017) and the Preferred Scale and Distribution of Development (October 2017).

8.10. Draft Policy SP12 (3) states:

*“Economic growth and investment will be supported in:*

*a) Shrewsbury to develop its role as the County Town and Strategic Centre;*

*b) The Principal Centres and Key Centres as the key employment and service centres*

*c) The ‘Strategic Corridors’, ‘Strategic Settlements’ and ‘Strategic Sites’ identified in the Plan”*

8.11. The settlements of Albrighton, Bridgnorth and Shifnal and the proposed Strategic Site at RAF Cosford are currently constrained by Green Belt boundaries.

8.12. Draft Policy SP14 states:

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

8.13. Paragraph 3.141 of the Explanation to draft Policy SP14 provides further clarification on what these ‘strategic corridors’ are. These include:

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

*- Shrewsbury as the Strategic Centre and County Town of Shropshire;*

*- Bridgnorth as a Principal Centre in the Shropshire Green Belt;*

*- Shifnal and Albrighton as Key Centres in the Shropshire Green Belt;*

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

8.14. In line with paragraphs 7, 8, 9 and 11 of the NPPF, the Council has therefore considered the objectives of delivering sustainable development, including the economic and social needs of communities, in establishing an appropriate strategy for the distribution of development which takes account of local circumstances and reflects the character, needs and opportunities of the area. This emphasis on ensuring a sustainable pattern of development is reiterated within paragraph 142 of the NPPF which discusses the considerations of reviewing Green Belt boundaries.

8.15. The overarching need to promote a sustainable pattern of development has therefore been the starting point to inform an appropriate development strategy, and

subsequently to the proposed review of the Green Belt boundaries. It is considered that Shropshire's dispersed pattern of urban settlements set against a mostly rural nature, does not lend itself to a county wide assessment of urban capacity as a starting point for taking decisions in relation to reviewing Green Belt boundaries. Indeed, it is considered such an approach could lead to inherently unsustainable patterns of development over time, failing to take adequate account of the need to provide development opportunities with sufficient access to services, facilities and employment opportunities.

- 8.16. It is also important to note that the preparation of this spatial pattern of growth involved an iterative process and careful consideration of reasonable alternative options to achieve a sustainable pattern of development which appropriately addresses and responds to development needs and opportunities and the unique characteristics of Shropshire.
- 8.17. The proposed development guidelines and subsequent proposed allocations for settlements are in the context of the proposed spatial strategy for the level and distribution of development, the role of specific settlements within this proposed spatial strategy and more generally in Shropshire, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and the characteristics/constraints/opportunities of specific settlements. This process therefore intrinsically involved consideration of all reasonable alternative options.
- 8.18. In line with Paragraph 140 of the NPPF, it is therefore considered that the Strategic Policies of the draft Shropshire Local Plan have established the need for potential changes to the Shropshire Green Belt in order to facilitate the preferred sustainable pattern of development to 2038 and beyond the end of the Plan period. It is considered that to do otherwise would inherently risk the ability of the Shropshire Local Plan to achieve a pattern of growth which utilises some of its most sustainable settlements in the east of the County, and in particular risks undermining the ability of the Plan to deliver the objective of achieving a 'step change' in its economic growth productivity.
- 8.19. Again, in line with NPPF Paragraph 140, subsequent detailed amendments to Green Belt boundaries have been considered as part of relevant settlement specific policies: S1 (Albrighton); S3 (Bridgnorth); S3.2 (Alveley); S15 (Shifnal); and S21 (Strategic Site: RAF Cosford).
- 8.20. In taking this approach, the consideration of the potential need to alter Green Belt boundaries has been undertaken at the localised settlement specific level, reflecting on the range of options available to the Council to accommodate settlement housing and employment requirements (informed by the extensive site assessment process described earlier within this Topic Paper).
- 8.21. In line with NPPF Paragraph 143(c), the consideration of local options has also taken into account the need to plan well beyond the end of the plan period in proposing land to be removed from the Green Belt and safeguarded for future development needs. This process of Safeguarding Land specifically recognises the intended permanence of Green Belt boundaries, and that their review is unlikely to be required (or preferred) on every review of a Local Plan. The conclusions of this exercise have been incorporated into the Sustainability Appraisal-Site Assessments for individual settlements.
- 8.22. The process undertaken for the proposed RAF Cosford Strategic Site was comparable to the above, but rather than consideration of supporting the role of

settlements, the focus was on supporting the role, vitality and long term sustainability of the existing site and its occupiers.

- 8.23. For those settlements and the strategic site where Green Belt release is proposed this Sustainability Appraisal/Site Assessment evidence can be found the following documents within the Examination Library:
- a. **SD006.03** – Sustainability Appraisal – Appendix B Albrighton Place Plan Area Site Assessments.
  - b. **SD006.05** – Sustainability Appraisal – Appendix D Bridgnorth Place Plan Site Assessments Updated.
  - c. **SD006.17** – Sustainability Appraisal – Appendix P Shifnal Place Plan Area Site Assessments.
  - d. **SD006.21** – Sustainability Appraisal – Appendix T Strategic Sites Assessments.

### ***Cross Boundary Need***

- 8.24. Shropshire Council has undertaken positive engagement and ‘duty to cooperate’ discussions throughout the Local Plan Review process. During these discussions, it became apparent that the Black Country Authorities (consisting of Dudley, Sandwell, Walsall and Wolverhampton Local Planning Authorities) were forecasting a significant level of unmet housing and employment land needs within their administrative areas, during the period proposed to be addressed within their ongoing joint Local Plan Review (2020 to 2039).
- 8.25. Following careful consideration, Shropshire Council concluded that it was appropriate to seek to support the development capacity of the Black Country Authorities within the draft Shropshire Local Plan (further information on this matter is provided within the Housing and Employment Topic Papers).
- 8.26. Specifically, within the draft Shropshire Local Plan it is proposed that around 1,500 dwellings and around 30ha of employment land will be accommodated in Shropshire during the proposed Plan period to 2038, as contributions to the forecast unmet needs arising in the Black Country. There is recognition that in accepting this level of unmet need from the Black Country Authorities, this would complement the proposed ‘urban focussed’ strategy set out in earlier iterations of the Local Plan Review during the Regulation 18 consultation stages.
- 8.27. The proposed contributions to unmet housing and employment needs are not proposed to be met on a specific site allocation(s) or within a specific settlement(s), but rather this unmet housing need would be incorporated within the Shropshire Local Housing Need and met in accordance with the proposed strategy for the distribution of development already advanced during the earlier stages of plan preparation at Regulation 18.
- 8.28. As such, the decision to seek to accommodate a proportion of the unmet housing and employment needs forecast to arise within the Black Country was not the principal factor in concluding that exceptional circumstances existed to justify the release of land from the Green Belt in Shropshire.
- 8.29. However, it is recognised that the central and eastern areas of Shropshire, including the settlements of Albrighton, Bridgnorth, Shifnal and Shrewsbury, generally have stronger links to the Black Country than the rest of Shropshire (further information on this matter is provided within the Housing and Employment Topic Papers). As such, these settlements (of which Albrighton and Shifnal are ‘inset’ within the Green Belt

and Bridgnorth is enclosed on its eastern boundary) are well placed to accommodate the proposed contributions to unmet housing and employment needs arising within the Black Country.

### ***Exceptional Circumstances***

- 8.30. Paragraphs 140 and 141 of the NPPF require Shropshire Council to identify exceptional circumstances to justify the release of land from the Green Belt. However, before doing so, they require Shropshire Council to consider all other reasonable options.
- 8.31. Through the iterative Local Plan Review process, Shropshire Council has considered all reasonable options. Specifically, Shropshire Council has:
- a. Developed a proposed spatial strategy for the level and distribution of development, informed by consideration of reasonable alternatives, careful consideration of best available evidence, extensive consultation and technical assessments (which both informed and appraised proposed) such as the Sustainability Appraisal, Habitats Regulations Assessment and Equality and Social Inclusion Impact Assessment.
  - b. Proposed an urban focussed strategy to the distribution of development, which takes account of the role of specific settlements and our understanding of the importance of ensuring the long term vitality and sustainability of communities, and the characteristics/constraints/opportunities of specific settlements.
  - c. Identified proposed development guidelines for settlements proposed to be identified as Strategic/Principal/Key Centres and Community Hubs. Given the nature of this process it intrinsically included consideration of all reasonable alternative options.
  - d. Identified proposed site allocations to contribute to the achievement of proposed development guidelines. Key evidence in the site selection process are the site assessments, which form appendices B-T of the Sustainability Appraisal (SD006.03 – SD006.21). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (SD006.22). This process inherently involved careful consideration of all alternative options/sites including where available brownfield sites and under-utilised land. It also considered opportunities to ensure the effective use of land and maximise site density. Green Belt was also given appropriate consideration within this exercise.
  - e. Considered the longer-term needs of settlements beyond the proposed Plan period and where appropriate, identified proposed safeguarded land. This land is not allocated for development at the present time, but is proposed to be removed from the Green Belt and safeguarded for development beyond the proposed Plan period. Key evidence in the site selection process are the site assessments, which form appendices B-T of the Sustainability Appraisal (SD006.03 – SD006.21). The location of sites within stage 2 of the site assessment are illustrated within appendix U of the Sustainability Appraisal (SD006.22). This process inherently involved careful consideration of all alternative options/sites (Green Belt was given appropriate consideration within this exercise). This provides certainty about the ability to meet the longer-term needs of our communities and about the longevity of proposed Green Belt boundaries.

- f. Identified the proposed extent of the Strategic Site at RAF Cosford. This is set against the context of this proposed spatial strategy, the role RAF Cosford plays more generally in Shropshire, and our understanding of the importance of ensuring the long term vitality and sustainability of the site and its occupiers.
- 8.32. With regard to the proposed spatial strategy for the level and distribution of development and the proposed development guidelines for settlements within the context of this proposed spatial strategy, we would note that paragraph 142 of the NPPF is of particular relevance, stating *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*
- 8.33. With regard to safeguarded land, we would note that such considerations are consistent with paragraph 143(e) of the NPPF which states in the context of defining Green Belt boundaries *“...be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period...”*.
- 8.34. With regard to RAF Cosford, we would note that alongside wider considerations, paragraph 143(b) of the NPPF is also relevant, stating in the context of defining Green Belt boundaries *“...not include land which it is unnecessary to keep permanently open...”*.
- 8.35. Where following the consideration of all reasonable alternative options, proposals involved the release of Green Belt, Shropshire Council carefully considered whether it believed that exceptional circumstances existed, sufficient to support proposed Green Belt release. Where it was considered that this was the case, again reflecting the iterative process of the Local Plan Review, these proposals progressed through the consultation process and the proposed exceptional circumstances were ultimately summarised within a Green Belt Exceptional Circumstances Statement and a subsequently updated Green Belt Exceptional Circumstances Statement (**EV051**).
- 8.36. As such the updated Green Belt Exceptional Circumstances Statement (**EV051**) summarises the process of considering all other reasonable options within the context of the preferred spatial strategy proposed for Shropshire; and the specific exceptional circumstances considered relevant for those locations where amendments are proposed to Green Belt boundaries. Specifically, Albrighton, Alveley, Bridgnorth (Stanmore), Shifnal, and RAF Cosford. It also identifies potential compensatory improvements to the remaining Green Belt associated with proposed releases. It is considered that this document positively responds to the requirements of paragraphs 140 and 141 of the NPPF.
- 8.37. The purpose of this Topic Paper is not to repeat the content of the Exceptional Circumstances Statement (**EV051**), rather it should be read alongside it.

## 9. Land Proposed to be Released from the Green Belt

9.1. Paragraph 25 of ID2 requested a comprehensive breakdown of all alterations proposed to the Green Belt within the draft Shropshire Local Plan.

9.2. The proposed changes to the Green Belt within the draft Shropshire Local Plan can be summarised as follows:

- a. Land proposed to be removed from the Green Belt to be allocated for residential development: 1.4ha.
- b. Land proposed to be removed from the Green Belt to be allocated for mixed use development (including housing): 2.4ha.
- c. Land proposed to be removed from the Green Belt to be allocated for employment development: 50.4ha.
- d. Land proposed to be removed from the Green Belt and safeguard for potential development beyond the proposed plan period: 116.3ha.
- e. Land proposed to be added to the Green Belt to protect from development: 0ha.
- f. Land proposed to be added to the Green Belt to reflect physical changes, correct cartographical errors, etc: 0ha.
- g. Land proposed to be removed from the Green Belt to reflect physical changes, correct cartographical errors, etc: 0ha.
- h. Any other alterations to the Green Belt: 214.2ha (The RAF Cosford Strategic site).

9.3. Table 2 provides a comprehensive breakdown of the proposed changes to the Green Belt in Shropshire within the draft Shropshire Local Plan, by detailed location and development category:

**Table 2: Land proposed to be removed from Green Belt within the draft Shropshire Local Plan: by detailed location & category:**

Location	Housing (ha)	Mixed Use including housing (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total All (ha)
<b>Albrighton</b>						
Land at Cross Road	-	-	-	-	6.98	6.98
Land bounded by Kingswood Rd, High House Lane & By-Pass	-	-	-	-	6.56	6.56
Land between By-Pass & Railway Line	-	-	-	-	6.32	6.32
<b>Total*</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>19.9</b>	<b>19.9</b>
<b>Alveley</b>						
Land north of Daddlebrook Road and west of A442 (ALV006 & ALV007)	-	2.4	-	-	-	2.4

Location	Housing (ha)	Mixed Use including housing (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total All (ha)
Land Adjacent to The Cleckars, Alveley (ALV009)	1.4	-	-	-	-	1.4
Land off Cooks Cross, Alveley	-	-	-	-	3.6	3.6
<b>Total*</b>	<b>1.4</b>	<b>2.4</b>	<b>0</b>	<b>0</b>	<b>3.6</b>	<b>7.4</b>
<b>Bridgnorth (Stanmore)</b>						
Land north of Stanmore Industrial Estate (P58a)	-	-	6.8	-	-	6.8
Land adjacent Hickman Road, Stanmore Industrial Estate (STC002)	-	-	4.6	-	-	4.6
<b>Total*</b>	<b>0</b>	<b>0</b>	<b>11.4</b>	<b>0</b>	<b>0</b>	<b>11.4</b>
<b>Cosford</b>						
RAF Cosford Strategic Site	-	-	-	214.2	-	214.2
<b>Total*</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>214.2</b>	<b>0</b>	<b>214.2</b>
<b>Shifnal</b>						
Land east of Shifnal Industrial Estate, Upton Lane (SHF018b & SHF018d)	-	-	39.0	-	-	39.0
Land adjoining junction of Stanton Rd & Lamledge Lane	-	-	-	-	4.5	4.5
Land adjoining Shifnal Hillcrest School & Shifnal Industrial Estate	-	-	-	-	9.4	9.4
Land between Revells Rough, Lamledge Lane & eastern rail line	-	-	-	-	10.4	10.4
Land between A464(S) & Park Lane	-	-	-	-	9.6	9.6
Land between Park Lane & A4169 at Lodge Hill	-	-	-	-	46.1	46.1
Land between A4169 & western rail line	-	-	-	-	12.8	12.8
<b>Total*</b>	<b>0</b>	<b>0</b>	<b>39</b>	<b>0</b>	<b>92.8</b>	<b>131.8</b>
<b>All Locations Grand Total*</b>	<b>1.4</b>	<b>2.4</b>	<b>50.4</b>	<b>214.2</b>	<b>116.3</b>	<b>384.7</b>

\*Totals rounded to one decimal place