

## Shropshire Council Response:

### Matter 6: Green Belt (Policy SP11)

**Issue:** Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall approach to the Green Belt.



*Question 1. What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council's approach to the Green Belt assessment robust and in line with national guidance?*

**Shropshire Council Response:**

*What is the basis of the Green Belt Review?*

**Overview**

- 1.1 Shropshire Council has reviewed the boundaries to the Shropshire Green Belt in preparing the Regulation 19 Pre-Submission Draft Local Plan. This was informed by the Green Belt Assessment (Stage 1) in September 2017 (**EV049.01**) and the Green Belt Review (Stage 2) in November 2018 (**EV050.01**).
- 1.2 This Green Belt Review is the first time Shropshire Council has assessed the Green Belt since the unitary authority was formed in 2009. Further, this is only the second time the Shropshire Green Belt has been reviewed since it was first designated in 1975.
- 1.3 This second Green Belt Review was considered necessary to help meet Shropshire's future development needs to 2038 and beyond. Consequently, the Draft Local Plan proposes to release 54.2ha of Green Belt land to be allocated for development largely for employment use but with a small provision for housing to 2038. These land releases are considered to be consistent with the proposed strategy for the Draft Local Plan to meet identified needs for sustainable development. This Green Belt land has been released in accordance with national planning policy in the National Planning Policy Framework (NPPF), paragraphs 140 – 142.
- 1.4 The Draft Local Plan also allocates existing safeguarded land (identified in the 1990's) around the Inset Settlements in the Green Belt to deliver the full complement of housing development in these settlements to 2038. This would have reduced the remaining area of existing safeguarded land to just 10.4ha. The Draft Local Plan therefore proposes to increase the amount of safeguarded land around the Inset Settlements to 116.3ha (releasing an additional 105.9ha) to meet Shropshire's future development needs beyond 2038. The Draft Local Plan also proposes to release 214.2ha of Green Belt land at RAF Cosford, considered to be unnecessary to keep permanently open. These land releases are made in accordance with national planning policy in NPPF, paragraph 143.
- 1.5 The existing safeguarded land around the Inset Settlements was released in 2006 through the Bridgnorth Local Plan (1996-2011). This land was identified in the very first Green Belt Review in the latter half of the 1990's. Current evidence for the Draft Local Plan indicates the area of the Shropshire Green Belt was not further

reduced following these land releases in the Bridgnorth Local Plan (2006). This indicates the success of the Shropshire Green Belt as a component of the larger West Midlands Green Belt, helping to encourage the development and re-use of urban land within the conurbation. Further, Shropshire Council, its predecessor authorities and their partners and stakeholders have been responsible guardians of the Shropshire Green Belt.

- 1.6 The evidence from the current review comprises the Shropshire Green Belt Assessment (**EV049.01**), the Shropshire Green Belt Review: Stage 2 (**EV050.01**), the Green Belt Release (Revised) Exceptional Circumstances Statement (**EV051**) and the Green Belt Topic Paper (**GC4g**). These documents are available on the Shropshire Local Plan Examination web-site at:  
<https://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/>.

### **Basis of the Green Belt Review**

#### Context

- 1.7 In undertaking this second Green Belt Review, Shropshire Council recognises the requirements of national policy in the NPPF paragraphs 137 to 146 and the Planning Practice Guidance (July 2019) in paragraphs 001 to 003. Shropshire Council recognises that this policy and guidance has been informed by interpretations provided by the Higher Courts to help give an authoritative position on managing the Green Belt.
- 1.8 There is no defined approach set out in national guidance on how Green Belt studies should be undertaken. However Inspectors' comments from the examination of a number of plans have highlighted the requirement for a comprehensive assessment and consideration of the Green Belt purposes and how land within an area contributes to these purposes. Finally, before land is proposed to be released from the Green Belt it is necessary to take steps to conclude that exceptional circumstances exist to justify releasing land. The requirements for reaching a conclusion about exceptional circumstances are set out in paragraphs 140 – 143 of the NPPF.
- 1.9 The background, structure and process of the Green Belt Review is explained in the Shropshire Green Belt Assessment (**EV049.01**), Shropshire Green Belt Review: Stage 2 (**EV050.01**) and the Green Belt Topic Paper (**GC4g**). These explain the reasons for Shropshire Council undertaking a Green Belt Review and progressing that Review to the conclusion that exceptional circumstances exist for the release of Green Belt land. This conclusion is evidenced in the Green Belt Release (Revised) Exceptional Circumstances Statement (**EV051**) and the Green Belt Topic Paper (**GC4g**). These identify

land proposed to be released to meet the needs for sustainable development, to safeguard land to meet future development needs and to release land that is unnecessary to keep permanently open.

#### Direction to Review the Shropshire Green Belt

1.10 The Draft Local Plan has been prepared on the direction of the Examining Inspector (Claire Sherratt) for the Site Allocations and Management of Development (SAMDev) Plan (2006–2026) following its adoption in 2015. The direction is detailed in the SAMDev Examination Report (**EVO10.01**) which identifies:

- in the Non-Technical Summary, that the Main Modifications include a commitment to an early review of the Local Plan including a detailed review of the Green Belt boundary:
  - SAMDev Plan Policy MD6 Green Belt in paragraph 3.48 consequently 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.”*
- in the Main Report in paragraph 23, the review will include a review of Green Belt boundaries to assess strategic options to deliver new development from 2016-2036;
- in the Main Report in paragraphs 189–190, that Bridgnorth lies on the edge of the West Midlands conurbation and *is tightly constrained by the West Midlands Green Belt. This has greatly limited the options available to the town in the SAMDev Plan. Bridgnorth, as the second largest market town in Shropshire with an important satellite employment area to the east at Stanmore offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets. Further, to accommodate the long term future of the town it is necessary to open up new areas. The provision of good quality employment land will provide a long term benefit by improving the range and choice of investment options in this location.*
- the Inspector also provided additional policy protection for ‘safeguarded’ land in Albrighton and Shifnal to safeguard its openness (even from appropriate development in the Green Belt) until the proposed Green Belt Review was completed.

1.11 The Council received specific directions from the Inspector (on behalf of the Secretary of State) that were included in the adopted SAMDev Plan (2015). These directions instigated a Green Belt Review to inform the sustainable growth options proposed in the Draft Local Plan. These directions are therefore key to the evidence base for undertaking a Green Belt Review and the proposals to release Green Belt land in the Draft Local Plan.

- 1.12 This evidence base provides a robust justification for reviewing the Shropshire Green Belt boundaries and for the release of Green Belt land. In particular, it is considered that the recommendations of the Examining Inspector for the SAMDev Plan point to a simple fact: the Council were unlikely to produce an appropriate, justified and effective spatial strategy for the Draft Local Plan without this review of the Shropshire Green Belt boundaries; and without the release of Green Belt land to support the sustainable pattern of development; and to safeguard future development needs in significant Inset Settlements in the Green Belt.

*What methodology has been applied and is it soundly based?*

- 1.13 Two Green Belt assessments were prepared to inform the Draft Local Plan. These included:
- Stage 1: Shropshire Green Belt Assessment (September 2017). This was a comprehensive study that assessed the performance of all land within Shropshire against the NPPF Green Belt purposes defined in para 137 of the NPPF;
  - Stage 2: Shropshire Green Belt Review (November 2018). This study assessed the potential harm of releasing land from the Green Belt within 29 potential opportunity areas around existing settlements, as well as around Cosford village and military base, and Junctions 3 and 4 of the M54 motorway.

### **Methodology for the Stage 1 Green Belt Assessment**

- 1.14 The assessment sought to provide an evidence-based, independent objective assessment of the contribution of the Shropshire Green Belt to the five Green Belt purposes. The assessment sought to achieve three key objectives:
- to apply a robust assessment methodology to determine the performance of the Shropshire Green Belt;
  - to comprehensively assess land within Shropshire against the aims and purposes of Green Belts;
  - to engage with relevant stakeholders to consider this assessment and to help fulfil the Duty to Co-operate.
- 1.15 The methodology for the Green Belt Assessment was divided into three main parts: Defining the Methodology, the Assessment Process and the Analysis and Findings, explained below.

#### **Defining the Methodology**

- 1.16 Developing the methodology included:
- Defining the parcels for assessment.

- Defining the assessment criteria
- Consulting with neighbouring authorities to agree the approach.

#### Definition of Assessment Parcels

1.17 Given the overall size of the Green Belt, it was necessary to divide it into appropriate parcels for assessment. This is an approach common to all Green Belt studies. The methodology for defining the parcels is set out in paras 3.5-3.10 of the Green Belt Assessment Report. In summary it identified two general types of land parcel:

1. Areas adjacent to built up areas. These comprised relatively small parcels of land adjacent to built up areas. Identifying land parcels at the edge of the Green Belt was considered important as it is these areas which are most likely to be considered for either inclusion or removal from the Green Belt. It also provides a means of identifying the differing characteristics and performance of the Green Belt along the urban edge. Smaller parcels were also identified around the smaller settlements inset within the Green Belt, around the industrial estates of Alveley and Stanmore, and along the M54 corridor.
2. Broad areas of Green Belt that were more remote from large built up areas and main settlements i.e. open countryside (including washed over settlements) and where there is potentially less variation in Green Belt performance.

#### Assessment Criteria

- 1.18 A key part of the method involved the development of an assessment framework using the five Green Belt purposes in national policy. A set of assessment criteria was drawn-up based on LUC's extensive experience of Green Belt assessments and using examples of good practice. For Green Belt Purposes 1-4 the assessment criteria set out: the specific Green Belt Purpose; key issue(s) to be considered; specific assessment criteria and ratings to be applied to each criterion. These are set out in Chapter 3 of the Green Belt Assessment.
- 1.19 The ratings covered a 4 point range: no contribution / weak / moderate / strong. The Shropshire assessment did not use aggregated ratings since combining a series of low or moderate ratings across the 4 purposes might be taken to indicate a more significant finding than a land parcel that makes a single strong contribution to Purpose 3. The ratings for the 4 key purposes were therefore presented separately for each land parcel.
- 1.20 Variations in the contributions to the different purposes across an individual land parcel can be an additional source of complication when determining assessment ratings. For example, to determine whether a rating should reflect the strongest level of contribution,

or the average across the parcel. In Shropshire, the assessment of individual land parcels is supported by an explanation of the assessment to justify any judgements behind the given rating. In particular, this explanation will identify any variations in the contribution of the land parcel where they exist.

#### Duty to Cooperate Consultation

- 1.21 A key element of the preparation of the methodology involved stakeholder engagement with Duty to Co-operate partners and more widely with other West Midlands Green Belt local authorities. This included neighbouring authorities in Wyre Forest, South Staffordshire, Worcestershire County, Telford & Wrekin, Staffordshire County, and also Wolverhampton, Birmingham, Dudley, Walsall and Rugby Councils. A record of stakeholder engagement demonstrates the obligations of the duty to co-operate have been met, as described in Section 110 of the Localism Act (2011). Comments were received on the methodology from Wyre Forest, South Staffordshire and Worcestershire Councils. Rugby, Telford & Wrekin, Staffordshire County and Wolverhampton chose not to make any comments on the methodology.

#### Assessment Process

- 1.22 Detailed assessments of the parcels were undertaken against the agreed methodology in two key stages of research:
- Desk Based Assessment - a preliminary desk based evaluation of the Green Belt and adjacent areas provided the initial findings of the assessment. The initial findings assessed each land parcel using OS maps, aerial images, Google Street View and relevant GIS data to gain an initial understanding of their performance against the Green Belt purposes.
  - Field Work - the desk-based assessment, judgements and findings were tested and refined through field surveys

#### Analysis and Reporting

- 1.23 A total of 85 parcels of Green Belt land were defined in the Study area, including six broad areas.
- 1.24 A Map Series in Figures 4.1 to 4.5 present the overall findings of the assessment for the broad areas and smaller parcels for each of the assessed Green Belt purposes (i.e. Purposes 1a, 1b, 2, 3 and 4) and a summary of the parcel ratings is provided in Tables 4.1 to 4.8 by settlement area.
- 1.25 Appendix 1 contains all the assessment sheets for the broad areas and parcels which present the detailed judgements behind the ratings against each Green Belt purpose and provide the detailed commentaries which explain and justify the findings. All the ratings

were cross-checked to ensure consistency, clarity and transparency in all the judgements.

- 1.26 The Green Belt Assessment found that the majority of the Green Belt in Shropshire contributes well to one or more Green Belt purposes. In particular, it helps to maintain the openness in key locations such as between Shifnal, Telford and Albrighton, which helps to protect the separate identity of these settlements. Lying at the periphery of the West Midlands Green Belt, the Green Belt in Shropshire also plays a key strategic role preventing the eastern expansion of Telford and the western expansion of the West Midlands conurbations of Wolverhampton and the Black Country, Birmingham and Coventry. Much of the Green Belt is open countryside and performs a key role in preventing the encroachment of development into the countryside.
- 1.27 The Stage 1 Green Belt Assessment provided a valuable analysis of how the Shropshire Green Belt and specific parcels within it perform against the Green Belt purposes. It did not seek to assess the potential harm of removing land from the Green Belt either for development, or to safeguard it for future development.

### **Methodology for the Stage 2 Green Belt Review**

- 1.28 The Stage 2 Green Belt Review Study, in contrast, did assess the potential implications of removing an area/site from the Green Belt and the impacts of its removal on adjacent Green Belt land and the integrity of the wider Green Belt. The study also considered any boundary issues associated with removing land from the Green Belt.

#### **Opportunity Areas**

- 1.29 The Stage 2 Green Belt Review considered 29 Opportunity Areas within the Shropshire Green Belt and drew conclusions on the relative harm to the Green Belt that may result from their potential release for development.
- 1.30 The 29 Opportunity Areas were identified by Shropshire Council as potential locations for areas of search around established settlements and strategic corridors and other key locations in the Green Belt. This provided a mechanism to test options for potential allocations of land for housing and employment development (and associated infrastructure), or to safeguard land to allow for future development needs.
- 1.31 The 29 Opportunity Areas identified within the Green Belt were focused around four Inset Settlements and other potential growth areas including:
- Albrighton                      4 Opportunity Areas in 2 potential locations
  - Alveley                            6 Opportunity Areas in 3 potential locations



- Bridgnorth 6 Opportunity Areas in 3 potential locations
- Shifnal 4 Opportunity Areas in 3 potential locations
- Cosford 4 Opportunity Areas in 2 potential locations
- M54 at Junction 3 3 Opportunity Areas in 1 potential location
- M54 at Junction 4 2 Opportunity Areas in 1 potential location

- 1.32 The concept of potential 'growth areas' was identified in the Shropshire Economic Growth Strategy. These were expected to be located primarily along the strategic corridors comprising principal communication routes through the County. For these reasons the Opportunity Areas included Cosford on the A41 to Wolverhampton and Junctions 3 and 4 on the M54 linking to the M6.
- 1.33 An assessment of the potential harm of release / development was undertaken for each parcel of land within the Opportunity Areas.
- 1.34 This approach is consistent with the latest case law on the matter, notably *Calverton Parish Council v Greater Nottingham Councils & others (2015)*. This found that planning judgments setting out the 'exceptional circumstances' for amending Green Belt boundaries must consider the 'nature and extent of harm' to the Green Belt'.
- 1.35 Without a clear definition of the scale, type and design of development likely to come forward within a specific Green Belt location, the harm assessment is based on an assumption that the openness (in Green Belt terms) of a defined area may be affected. This ensures a consistent approach across the study area.
- 1.36 The key factors informing the assessment of harm included:
- 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.
  - 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.

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

1. High harm
2. Moderate-high harm
3. Moderate harm
4. Low-moderate harm
5. Low harm

1.38 The detailed commentary on the ratings are set out in Appendices 1-7 of the Stage 2 Green Belt Review Report (**EV051**).

1.39 In some cases the release of land in these Opportunity Areas might lead to the creation of a similar Green Belt boundary to the existing Green Belt edge, in which case commentary was not included in the relevant assessment of harm.

#### Findings

1.40 The Opportunity Areas, and the Stage 1 parcels within each area, were presented in Table 3.5 of the Study. Where the analysis found that different parts of an Opportunity Area were likely to have different levels of harm, the findings of the assessment set out these variations through the sub-opportunity options with reference to the relevant parcel numbers.

*Is the Council's approach to the Green Belt assessment robust and in line with national guidance?*

#### **Requirements of National Policy**

1.41 National policy in paragraph 137, attaches great importance to Green Belts and stresses their essential characteristics of openness and permanence and that once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation of a Local Plan.

1.42 In preparing the Draft Local Plan, Shropshire Council recognises that national policy requires strategic policy-making authorities to establish the 'exceptional circumstances' for altering the Green Belt boundaries within their administrative area. The requirements of national policy are addressed through the further elements of this Statement.

*Question 2. Has a comprehensive assessment of capacity within built up areas been undertaken? How have all potential options on non-Green Belt land in the countryside been assessed and discounted?*

**Shropshire Council Response:**

2.1 The Draft Local Plan (**SD002**) recognises that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, national policy in paragraphs 141(b) requires that:

*“strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph (140), and whether the strategy:*

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

Urban Focus

2.2 The Draft Local Plan identifies in Policy SP2(5) the spatial strategy for the distribution of development in the County which is:

*“To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas identified in Schedule SP2.1.”*

2.3 This urban focus is further explained in paragraphs 3.22, 3.23 and 3.19 of the Explanation which state that:

*“3.22. The strategic approach is to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work.”*

*“3.23. It represents a sustainable pattern of growth, directing the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support new development. These settlements are identified in Schedule SP2.1.”*

*“3.19. A sufficient supply of employment land, focused within the urban areas, has been provided to enable choice and competition within the market and to also recognise the diverse needs of different employers, particularly within the Strategic and Principal Centres of Shropshire. The urban areas will also perform their economic roles in support of the employment*

*needs of settlements and communities in the rural areas of the County.”*

- 2.4 Schedule SP2.1 identifies the urban locations proposed to be the principal focus of the spatial strategy and for the distribution of development land. The Housing Topic Paper (**GC4n**) and the Employment Strategy Topic Paper (**GC4g**), which respond to the Inspectors Questions in ID2, further identified the spatial distribution of development into these urban locations.
- 2.5 In the housing spatial strategy, these urban locations will provide over 70% of the housing guidelines in the Draft Local Plan and over 70% of the committed and proposed sites in the housing land supply. In the economic spatial strategy, they provide 100% of the employment land guidelines in the Draft Local Plan and over 85% of the committed and proposed sites in the employment land supply.
- 2.6 The urban locations in Schedule SP2.1 taken together with the strategic objectives of Policy SP2 and the evidence of the spatial distribution of development in the Housing and Employment Strategy Topics Papers provide the following urban focus to the strategic approach in the Draft Local Plan:
- Shrewsbury: accommodating 28% of the housing requirement and 27% of the employment requirement;
- Principal Centres: accommodating 24% of the housing requirement and 46% of the employment requirement;
- Key Centres: accommodating 17% of the housing requirement and 24% of the employment requirement;
- Strategic Settlements: accommodating 4% of the County's housing requirement and 3% of the employment requirement;
- Strategic Site: supporting the Ministry of Defence, RAF Museum and Midlands Air Ambulance Charity.
- 2.7 These urban locations are complemented by appropriate new development in the rural areas comprising:
- Rural Areas: the complement of new development to satisfy the housing and employment requirements will occur in:
- Community Hubs which are significant rural service centres, in Schedule SP2.2;
  - Community Clusters which are seeking to maintain or enhance their sustainability, in Schedule SP2.3.
  - rural areas where new development will meet evidenced local needs for affordable housing and rural diversification and employment demands.

- 2.8 This 'Urban Focussed' approach will provide access to the broadest range of services and facilities for these urban communities and those in the rural hinterlands. This will also provide the greater opportunity to deliver a 'step change' in the capacity and productivity of the local economy.
- 2.9 This 'Urban Focussed' strategy is supported by strategic policies for the distribution and delivery of development:
- 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;
  - SP13 – Delivering Sustainable Economic Growth and Enterprise;
  - SP14 - Strategic Corridors.
- 2.10 In particular, Policy SP11 recognises that Bridgnorth, Albrighton and Shifnal, RAF Cosford and Alveley are all constrained by either the outer Green Belt Boundary (i.e. Bridgnorth) or by the Green Belt boundaries formed around the other settlements or washing over the development at RAF Cosford.
- 2.11 Policy SP11 sets out the policy framework for development in these settlements. Policies SP7, SP8, SP12 and SP13 recognise the significance of the settlements to the strategic approach in the spatial strategy in Policy SP2. Policy SP14 recognises the strategic significance of these locations to the delivery of a sustainable pattern of development through their connectivity to the strategic road and rail networks.
- Urban Capacity and Non-Green Belt Land
- 2.12 The Draft Local Plan is informed by evidence which evaluates the role, function, development needs and constraints of settlements in the settlement hierarchy of the County. This has informed the distribution of development and the scale of provision in each settlement to deliver a sustainable pattern of development as required in national policy in NPPF paragraphs 7, 8 and 9.
- 2.13 These objectives have been achieved through the:
- Hierarchy of Settlements Assessment (**EV060**);
  - Infrastructure - Place Plans (**EV067.01 – EV067.018**);
  - Sustainability Appraisal and Place Plan Site Assessments (**SD006.01 – SD006.22**).
- 2.14 These evidence sources evaluated the strategic significance and development potential of all settlements in the County, informed the spatial strategy for the Local Plan and directed the delivery of a

sustainable and deliverable supply of land for housing and employment development. These evidence sources:

- benchmarked settlements that should properly form part of the urban focus for the spatial strategy;
  - identified the potential of larger rural settlements;
  - scoped opportunities for smaller settlements and countryside locations to further contribute to the delivery of development;
  - evaluated the sustainability of the urban and rural settlements;
  - evaluated the urban capacity within and around these settlements through the targeted assessment of promoted sites.
- 2.15 This evidence base provided reliable information on the potential locations and scale for development in the County. This enabled the possible scale of Green Belt land releases to be assessed and managed within the spatial strategy for the Draft Local Plan.
- 2.16 The Housing and Employment Topic Papers further evaluated the effect of including two Strategic Settlements at Ironbridge and Tern Hill in the spatial strategy which is summarised in the Employment Strategy Topic Paper in paragraphs 4.14 – 4.40. This helped to alleviate the burden of development placed on the Principal and Key Centres within and adjoining the Green Belt.
- 2.17 The consideration of smaller settlements included the smaller Inset Villages of Beckbury, Claverley and Worfield designated as countryside in the Green Belt. Their suitability to meet development needs were assessed to help meet development needs and avoid releasing Green Belt land. Each of these settlements had only a limited service provision and so, were not Community Hubs. Further, none of these settlements were proposed to be Community Clusters by their local communities and their representatives.

#### Hierarchy of Settlements Assessment (**EV060**)

- 2.18 The Hierarchy of Settlements Assessment helped to assess:
- settlements that should properly form part of the urban focus for the spatial strategy;
  - the potential of larger rural settlements;
  - opportunities for smaller settlements and countryside locations to further contribute to the delivery of development;
  - the sustainability of the urban and rural settlements.
- 2.19 Shropshire is the fourth largest Local Authority in England. This Settlement Assessment addressed the challenge of benchmarking 550 recognisable settlements in the County where potential urban capacity might be identified. This represents a different but proportionate approach to the assessment of urban capacity in such a large rural County like Shropshire.

2.20 The Hierarchy of Settlements Assessment provided the following evidence on urban capacity:

benchmarking named settlements – considered the size of the population in to target settlement of 100+ persons or 50+ dwellings and the self-containment of the settlements through the degree of dispersal of its built form. This identified named settlements to a specific location with a definable centre and removed just five settlements from the assessment.

sustainability of settlements – this considered how the remaining settlements function through their services and facilities. This enabled the settlements to be compared, ranked, and categorised on scoring system that attributed points for:

- facilities – comprising a comprehensive list of amenities and community and commercial facilities to differentiate settlements on their role and function. This also identified where settlements performed above and beyond the role that might be expected from their size possibly due to location, accessibility or relative isolation. Differentiating settlements in this way helped to inform the urban focused strategy;
- services – services comprised high-speed broadband provision; employment opportunities; and public transport links and more clearly identified the role, function and significance of settlements and where settlements functioning beyond the role that might otherwise be expected of them.

defining the urban focus – this assessment enabled the Hierarchy of Settlements to be defined and for specific settlements to be assigned to the different urban tiers and specifically the Strategic Centre, Principal Centres and Key Centres. This Hierarchy comprised the 6 major urban centres of Shrewsbury, Oswestry, Bridgnorth, Whitchurch, Market Drayton and Ludlow and the 12 Key Centres which were confirmed in Policy SP2 of the Draft Local Plan.

identifying larger rural settlements and scoping opportunities for other rural development – the Hierarchy of Settlements Assessment identified the specific role and function of larger village, service centres that became Community Hubs and indicated smaller settlements with the potential to self-select to be Community Cluster settlements. The identified Community Hubs were confirmed in Policy SP2 totalling 44 settlements with only Alveley and Cosford in the Shropshire Green Belt.

Infrastructure - Place Plans (**EV067.01 – EV067.018**)

2.21 Place Plans brought together information about a defined area to support the Strategic Infrastructure Implementation Plan (**EV067**). The Infrastructure Place Plans helped to assess:

- the sustainability of the urban and rural settlements.

- 2.22 Place Plans contain the focussed assessment of infrastructure needs, such as roads, transport facilities, flood defences, schools and educational facilities, medical facilities, sporting and recreational facilities, open spaces and other information to understand local needs. The Place Plans informed decisions on the local need for development and infrastructure and the continuing sustainability of settlements without these investments.
- 2.23 The Place Plans assisted the spatial strategy in directing development towards those urban areas and named larger settlements where using the available urban capacity would benefit communities across the County. This identified where development might be directed towards Inset Settlements to support their communities and deliver investment in their infrastructure.

#### Sustainability Appraisal and Place Plan Site Assessments (SD006.01 – SD006.22) -

- 2.24 The Sustainability Appraisal and Site Assessment processes helped to determine the suitability, developability and deliverability of available urban capacity and other promoted sites in and around the settlements in the County. These processes helped to assess:
- the sustainability of the urban and rural settlements;
  - the urban capacity within and around these settlements through the targeted assessment of promoted sites.
- 2.25 These two complementary assessments considered information about promoted site in relation to:
- the environmental assets in and around the settlement and the facilities and services within the settlement; and
  - technical assessments to determine the suitability and developability of the site or the need to protect the land.
- 2.26 This sought to ensure that evidence of urban capacity across the County would meet the requirements of national policy NPPF paragraph 31 that the review of the plan: " should be underpinned by relevant and up-to-date evidence".
- 2.27 The Council considered that the spatial strategy, informed by this evidence, would satisfy national policy in NPPF paragraph 16 to be:
- a. prepared with the objective of contributing to the achievement of sustainable development;
  - b. prepared positively, in a way that is aspirational but deliverable.

#### Sustainability Appraisal

- 2.28 The sustainability appraisal assessed all sites against a standard set of 15 sustainability criteria on a weighed scoring system to assign an overall number score to each site and to reach an overall



sustainability conclusion from Good, Fair and Poor. This comparative assessment for all sites across individual settlements permitted two important 'planning balance' judgements to be drawn about promoted sites in the County to:

- assess individual sites on their availability, suitability, developability and deliverability; and
- to compare the suitability of the site with the sustainability of its location and relevant national policies in the NPPF.

2.29 Whilst a clear objective of preparing the Draft Local Plan was to ensure that exceptional circumstances exist for releasing Green Belt land that the minimum land necessary be released, Green Belt is not the only restrictive policy in the framework as laid down in NPPF Footnote 7. The sustainability appraisal therefore weighed in balance the protection of both the landscape quality of the countryside and the protection of the Green Belt.

#### Site Assessment Process

2.30 This assessment formed the core evidence of the urban capacity assessment based around the findings from extensive consultations on the suitability and developability of the sites, a strategic assessment of the site and its contribution towards a sustainable pattern of development, an informed planning judgement on the site as a potential development option and a recommendation as to the preferred use, the development potential or the protection of the site.

2.31 This assessment included evidence from the Green Belt Assessment and the Stage 2 Green Belt Review in relation to the contribution to the Green Belt purposes and any harm to the Green Belt from releasing sites. The assessment also considered the availability of safeguarded land in the Inset Settlements.

2.32 It is recognised that the Draft Local Plan proposes to release land from the Green Belt. However, housing development will only require the release of 1.4ha and mixed- use developments only 2.4ha of Green Belt land. There is a significant requirement for 50ha of employment land around Bridgnorth (11ha) and Shifnal (39ha). The greater release of Green Belt land development purposes (116ha) is to safeguard land for future development in Shropshire beyond 2038 following the extensive use of existing safeguarded land for development in the Inset Settlements.

*Question 3. Have opportunities to maximise capacity on non-Green Belt sites been taken (including increasing densities)?*

**Shropshire Council Response:**

3.1 The Council recognises that before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, national policy in paragraphs 141(b) requires that the Plan:

*b. optimises the density of development in line with the policies in chapter 11 [of NPPF], including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport."*

3.2 Density of development is considered in the spatial strategy for both housing and employment development. This considers the sustainability of the strategy through the efficient use of land and the effective delivery of development to meet identified needs.

Housing Development

3.3 A primary objective of the spatial strategy, with its prescribed 'urban focus', is to achieve densities of around 30 dwellings per hectare particularly within larger urban centres. This is assumed within the site assessment process and evidenced in the indicative housing capacity on Site Assessment – Stage 2b Summary Form.

3.4 A recognition of the potential for variation in density still exists but this is a policy matter addressed through the development management process. Policy DP3 establishes the requirement to deliver on-site affordable housing in relation to the proposed capacity of the site. Policy DP3 in paragraph 4.56 identifies that, where it is necessary to do so:

*"4.56. The Council reserves the right to calculate the capacity of the site to accommodate dwellings where it considers that the development proposed is not an appropriate density specifically for the purpose of avoiding the affordable housing threshold. The Council may also consider the overall area and capacity of adjoining parcels of land where development is phased or subject to separate planning applications, where such parcels can be considered to make up a larger site."*

3.5 This policy objective seeks to achieve the objectively assessed need for housing through the efficient use of land. This supports:

- Policy SP7 to ensure settlement residential guidelines are met to deliver the housing requirement. A presumption for 30 dwelling per hectare for housing development makes an important contribution to this objective;

- Policy SP3 to reduce carbon emissions through a number of means including supporting the principle of delivering higher density development on the most accessible urban sites. The density of housing and employment development makes an important contribution to this objective.

#### Employment Development

- 3.6 The Employment (Requirement) Topic Paper (**EV0112**) in paragraphs 4.42 to 4.47 identifies that the standard assumption for the density of employment development is for 40% of the land to accommodate built development. From 2006 to 2020, Shropshire delivered an average density of 26% of built development.
- 3.7 The Employment (Requirement) Topic Paper concludes:
- 4.47 The effect of the difference between the actual plot ratio (at 26%) in Shropshire and the standard plot ratio (at 40%) assumed in the EDNA would underestimate the volume of employment land required to meet the employment needs of the growing population in Shropshire.*
- 3.8 This matter is now considered in the employment land requirement as identified in paragraphs 5.17 to 5.23 of the Topic Paper.
- 3.9 Nevertheless, improving the density of employment remains an objective for the spatial strategy as noted in the Employment (Requirement) Topic Paper:
- 4.27 ...the broader objective of seeking an improvement in the plot ratios, so that the drive to increase delivery in the County might also result in a decrease in the amount of land being used as the local economy becomes more efficient in the use of land.*
- 4.28 This objective is not set into policy since the provision of a standard plot ratio will be difficult to achieve across all types of sites and in all development locations. This fact would lead to the most likely outcome, that a range of plot ratios are introduced to match different locations, which is the situation that already exists in the County. The Council wishes to indicate, through the economic growth and development management services, the commercial and environmental opportunities open to the market from increasing the amount of floorspace within a development in order to reduce the amount of land required to deliver these economic benefits.*
- 3.10 This approach is established in Settlement Policies with new strategic employment allocations which identify the total area of the employment allocations in hectares and the assumed development density (plot ratio) at the standard 40%. In Shrewsbury the release

of 45ha West of the A49 is expected to deliver 19ha of built development. In Shifnal the release of 39ha of land is expected to deliver 16a of built development. In Bridgnorth the release of 11ha of Green Belt land around Stanmore Industrial Estate is expected to reflect the existing plot ratios on this established Industrial Estate.

#### Maximising Capacity

- 3.11 Opportunities to maximise the density of housing and employment development across the County have been identified in the evidence that informed the Draft Local Plan. This has informed the spatial strategy, strategic policies, development management policies and settlement policies to achieve the efficient use of land and the effective delivery of development to meet the needs of the communities of the County.
- 3.12 These influences have identified an optimum allocation of new land to meet the objective housing and employment land requirements. This has reduced the burden of development on the significant landscapes of the County including the Green Belt and the Shropshire Hills Area of Outstanding Natural Beauty.

*Question 4. Have discussions taken place with neighbouring authorities about whether they could accommodate some of Shropshire's identified housing and employment land needs?*

#### **Shropshire Council Response:**

- 4.1 The duty to co-operate discussions with neighbouring authorities over the capacity to accommodate Shropshire's identified housing and employment land needs, as they relate to the Green Belt, is addressed in the Green Belt Topic Paper (**GC4g**) from paragraphs 7.33 to 7.45. This is considered further in the Green Belt Release - Revised Exceptional Circumstances Statement (**EV051**).
- 4.2 The Council considers the duty to co-operate to be an important part of plan-making this is embedded in the Local Plan Review. Discussions with relevant bodies have been undertaken during the process and documented for the Examination through Statements of Common Ground (**EV021 – EV041**).
- 4.3 Shropshire adjoins the Local Planning Authorities of 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.
- 4.4 There are other Local Planning Authorities with a functional relationship with Shropshire, most notably the Black Country

Authorities (consisting of Dudley, Sandwell, Walsall and Wolverhampton Local Planning Authorities).

- 4.5 In February 2020, a letter was sent to these Local Authorities regarding potential Green Belt land releases in Shropshire. A copy of this letter is included as Appendix 1 to the Green Belt Release – Revised Exceptional Circumstances Statement (**EV051**).
- 4.6 This letter identified the circumstances which led to a Green Belt Review to inform the Draft Local Plan. This identified the likely proposals for development within Inset Settlements and on the outer boundary of the Green Belt. The letter described proposals at Albrighton, Alveley, Bridgnorth and Shifnal, together with strategic sites within the Green Belt and the rationale in each location.
- 4.7 The letter to neighbouring Local Authorities asked whether there was suitable, available and deliverable land within their area which would be able to functionally serve geographical location(s) in east Shropshire to avoid Green Belt land releases in Shropshire.
- 4.8 No Local Authorities indicated they had such opportunities to accommodate Shropshire's identified housing and employment land needs as they relate to the Green Belt. Comments received highlighted a range of issues impacting on their ability to meet any unmet needs such as: significant distance from the locations in east Shropshire with inter-related sustainability issues; lack of correlation between the functional economic and/or housing market areas in Shropshire; mismatches with the timing of the plan preparation in Shropshire, their own local need for Green Belt land releases and other constraints and challenges in meeting their own local housing need.
- 4.9 The opportunity to meet Shropshire's development needs outside the County to avoid the release of Green Belt land was explored but no options were identified to meet Shropshire's needs in this way.

*Question 5. How have the conclusions of the Green Belt Review informed the Local Plan? Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport? Where is this evidenced?*

### **Shropshire Council Response:**

*How have the conclusions of the Green Belt Review informed the Local Plan?*

#### Green Belt Land Releases

- 5.1 The Draft Local Plan proposes to release land from the Green Belt and to redefine the Green Belt boundary to provide for:
- the need for housing development which requires only 1.4ha of Green Belt land and mixed-use developments requiring 2.4ha;
  - a significant requirement for employment land (50.4ha) around the settlements of Bridgnorth (11.4ha) and Shifnal (39ha);
  - a greater release of Green Belt land to:
    - safeguard land (comprising 116.3ha) for future development beyond 2038 at Albrighton, Alveley and Shifnal;
    - avoid the unnecessary protection within the Green Belt of land that is not permanently open (214.2ha) at RAF Cosford.

#### Green Belt Review

- 5.2 The Green Belt Review assessed the potential harm of releasing land parcels from the Green Belt within 29 identified Opportunity Areas around Inset Settlements and in other Green Belt locations.
- 5.3 This approach follows the case law in *Calverton Parish Council v Greater Nottingham Councils & others* (2015). This found that planning judgments setting out the exceptional circumstances for amending Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt.

#### Judgments about Harm to the Green Belt

- 5.4 The assessment of potential harm for each Opportunity Area was given a rating on a 5-point scale from High Harm / Moderate-High Harm / Moderate Harm / Moderate-Low Harm / Low Harm. These ratings of harm were arrived at using professional judgement and with detailed commentary in the Stage 2 Green Belt Review Report (**EV051**). 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 through the identification of Sub-Opportunity Areas to divide the land parcel.

- 5.5 The assessment of harm for the Opportunity Areas, the Sub-Opportunity Area options and their constituent land parcels are presented in Table 3.5 of the Green Belt Review Report.
- 5.6 The assessment of harm within the 29 Opportunity Areas helped to:
- recognise any developed areas, existing urbanised character or variations in the openness of the land within the parcels;
  - look at opportunities and options for allocating land to support the sustainability of settlements or strategic sites;
  - provide evidence to help consider proposals being promoted for development in the Green Belt;
  - safeguard land to allow for future development needs.

#### Draft Local Plan Land Releases

- 5.7 The primary means of considering harm to the Green Belt from releasing land was through the methodology and findings for each Opportunity Area (or sub-area) in the Stage 2 Green Belt Review. This Study was presented by the consultants and considered separately to the process of preparing the Local Plan.
- 5.8 This first, separate assessment focused on understanding the effects of releasing land from the Green Belt regarding: the level of any harm that might be caused to the Green Belt; the likely causes of that harm; whether the severity of any harm might be reduced.
- 5.9 This assessment had regard to three key considerations:
- For each Opportunity Area, the level of harm that might be caused by releasing the land parcels and the causes of the harm from the contribution to the four main Green Belt purposes;
  - For each settlement, the level of harm that might be caused by releasing each of the Opportunity Areas, whether this harm might be reduced by the Sub-Opportunity Areas;
  - For the Green Belt, what levels of harm might be caused by directing development to particular settlements and might there be other opportunities to reduce any harm to the Green Belt.
- 5.10 The site assessments used to determine the suitability of sites promoted for development in the Draft Local Plan enabled the findings of the Green Belt Review to be further assessed through a broader planning judgement. This placed the significance of any harm to the Green Belt (from releasing land) firstly into a broader assessment of the sustainability of promoted sites and secondly into a technical assessment of the suitability, developability and deliverability of these promoted site options. This enabled a comparative assessment of each site to be undertaken in relation to all the site options in any settlement or particular location.

- 5.11 The site assessment process included consideration of the contribution of each promoted Green Belt site to the four main Green Belt purposes and to the harm of releasing the site or a smaller area within it, from the Green Belt.
- 5.12 The site assessment also considered all promoted sites against a standard and extensive technical assessment of their availability, suitability, developability and deliverability.
- 5.13 This assessment formed the core evidence of the urban capacity assessment using the findings from extensive consultations on the suitability and developability of the sites, a strategic assessment of the site and its contribution towards a sustainable pattern of development, an informed planning judgement on the site as a potential development option and a recommendation on the preferred use, development potential or protection of the site.
- 5.14 The very low level of Green Belt land release for housing development specifically reflects the effective operation of the site assessment process. This included the identification of land that was still protected within the Green Belt and the existing safeguarded removed from the Green Belt in the mid-1990's.
- 5.15 The site assessment also compared the relative levels of sustainability for urban land, safeguarded land, and Green Belt land. These comparisons considered the characteristics of promoted sites (specifically in the Site Assessments), their relative locations in and around the Inset Settlements or other locations (specifically in the Sustainability Assessment) and the strategic significance of the sites (specifically in the Green Belt evidence).
- 5.16 In particular, this served to focus the selection of housing sites towards safeguarded land in Shifnal however, Alveley had no safeguarded land available. Further, in Bridgnorth the Regulation 18 Preferred Sites Consultation had proposed significant housing development in the Green Belt. Following further consideration of these proposals and the Regulation 18 consultations, the focus of housing development was moved to the west to avoid significant harm to the Green Belt around the east of the town.

*Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport?*

#### Settlement Assessments and Conclusions

- 5.17 The effect of the Green Belt land releases in the Inset Settlements and other locations are summarised in Appendix 1.



*Where is this evidenced?*

5.18 Evidence that describes how assessment of harm to the Green Belt informed the Local plan is contained in:

- Green Belt Review (**EV050.01**).
- Sustainability Appraisal - Appendix B. Albrighton Place Plan Area Site Assessments (**SD006.03**).
- Sustainability Appraisal - Appendix D. Bridgnorth Place Plan Site Assessments Updated (**SD006.05**).
- Sustainability Appraisal - Appendix P. Shifnal Place Plan Area Site Assessments (**SD006.17**).
- Sustainability Appraisal - Appendix T. Strategic Sites Assessments (**SD006.21**).
- Green Belt Revised Exceptional Circumstances Statement December 2020 – (**EV051**).
- Regulation 18 Consultation on Preferred Sites (**EV005.01**).
- Appendix B.3. Local Plan Review - Preferred Sites Consultation Bridgnorth (**EV005.02.03**).
- Regulation 19: Submission Draft of the Shropshire Local Plan 2016 to 2038 (**SD002**).

*Question 6. Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt?*

**Shropshire Council Response:**

- 6.1 Duty to co-operate discussions with the Black Country are explained in the Statement of Common Ground with the Black Country Authorities (**EV041**) and in the Housing Topic Paper (**GC4g**) and Employment Strategy Topic Paper (**GC4n**). This issue is addressed in detail under Matter 4 for housing and employment land needs.
- 6.2 Shropshire Council undertook positive engagement and 'duty to cooperate' discussions throughout the Local Plan Review. The Black Country Authorities (consisting of Dudley, Sandwell, Walsall and Wolverhampton Local Authorities) forecasted a significant level of unmet housing and employment needs within their administrative areas for their emerging joint Draft Local Plan 2020 to 2039.
- 6.3 Shropshire Council carefully considered the unmet needs in the Black Country as set out in the Housing and Employment Strategy Topic Papers. It was concluded that Shropshire should support the development capacity of the Black Country Authorities through the housing and employment land requirements in the Draft Local Plan.

- 6.4 The Draft Local Plan proposes that around 1,500 dwellings and around 30ha of employment land be accommodated in Shropshire up to 2038 to contribute towards forecast unmet needs in the Black Country. This will permit Black Country residents to seek housing and employment in locations across Shropshire supported by the 'urban focussed' strategy, along Strategic Corridors through the County, in the Draft Local Plan.
- 6.5 These unmet housing and employment needs are not proposed to be met on any specific site allocation(s) or within any specific settlement(s). The unmet housing need is incorporated within the Shropshire Local Housing Need and met in accordance with the proposed strategy for the distribution of development advocated in the Regulation 18 stages of the local plan review.
- 6.6 The capacity of Shropshire to accommodate Black Country unmet housing and employment land needs through Green Belt land releases as they relate to the Green Belt is further addressed in the Green Belt Topic Paper (**GC4g**) from paragraphs 8.24 to 8.29. It is specifically identified in paragraph 8.28 that:
- 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.*
- 6.7 Settlements including Shrewsbury and Bridgnorth and the Inset Settlements of Albrighton and Shifnal may be well located to contribute towards the unmet housing and employment needs arising within the Black Country. Nevertheless, the Draft Local Plan makes limited provision for housing and employment development on Green Belt land, particularly within the Inset Settlements.
- 6.8 The Draft Local Plan has therefore sought to meet needs in accordance with delivering a sustainable strategy and in response to development opportunities in settlements across the County. The decision to contribute towards unmet needs within the Black Country will be met from within this spatial strategy for the County. The unmet needs of the Black Country has not resulted in a need to release or safeguard more land from the Green Belt in Shropshire.
- 6.9 Albrighton has a single housing allocation with a capacity for 180 dwellings and no new employment land provision. Shifnal has three housing site allocations with a combined capacity for 230 dwellings but they all comprise existing safeguarded land identified in 2006. Alveley has a single housing site allocation with a capacity for 130 dwellings and no new employment land provision. Only the proposed new employment allocation for 39ha in Shifnal might be considered capable of making such a contribution.

- 6.10 The release of 39ha of Green Belt land for employment development in Shifnal is explained in the Green Belt Release - Revised Exceptional Circumstances Statement (**EV051**). This provides for the needs of the town and its community for a sustainable pattern of development and the delivery of infrastructure investment. The release of this land is further explained in the Statement of Common Ground with the site promoter Harrow Estates which identifies that:

*Shifnal offers the opportunity to better balance employment and housing provision, to create a more sustainable pattern of development in Shropshire. It is agreed that there is an acute need for local employment land at Shifnal, to balance against the significant housing delivery experienced at Shifnal over the current Plan period. This will achieve greater internalisation of employment opportunities within the town, reduce out-commuting and foster a more sustainable approach to employment accessibility.*

*Question 7. Is the extent of safeguarded land sufficient to meet longer term needs beyond the plan period and are they justified?*

**Shropshire Council Response:**

- 7.1 Policy SP11(2) identifies that land proposed to be safeguarded for longer term development needs is shown (blue) on the Policies Map. The justification for removing this land from the Green Belt is identified in paragraph 3.99 of the Policy Explanation that:

*"A longer-term view was taken in line with national guidance which requires that when defining Green Belt boundaries that Local Plans should, where necessary, identify safeguarded land to meet development needs significantly beyond the Plan period. Thus, the Local Plan review, in considering the Green Belt, has looked both at Shropshire's current Plan development requirements and the need to safeguard land to accommodate future development needs beyond 2038".*

- 7.2 The effect of this approach is identified in paragraph 3.100 and Table SP11.1 of the explanation to SP11, that there is:

*"a total of some 116.3ha of safeguarded land with 19.9ha at Albrighton, 3.6ha at Alveley and 92.8ha at Shifnal".*

- 7.3 It is identified in paragraph 3.103 of the Policy Explanation that safeguarded land will be protected from development prior to 2038:

*"Whilst safeguarded land has been removed from the Green Belt it has been specifically identified in order to meet any sustainable*

*development needs that may exist beyond the Plan period and remains unavailable for permanent development until allocated by a future Local Plan. The Policies Map shows the locations of safeguarded land in Shropshire”.*

- 7.4 This reflects national policy on the provision of safeguarded land in the NPPF paragraph 143(c) and (d) that Plans should:
- c) *where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; and*
  - d) *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- 7.5 The Draft Local Plan (**SD002**) intends that all safeguarded land on the Policies Map should be protected for allocation in future local plans. The safeguarded land comprises 116.3ha and so, this is the amount of land expected to be available for future development.
- 7.6 There is no recognised method to quantify the future development needs for the Inset Settlements in the Green Belt. One method to determine future needs is to assess previous demands for land in the Green Belt. This method would also need to consider: whether any previously existing safeguarded land might be carried forward and the requirements of current national policy on Green Belts to use other reasonable development options in Green Belt locations.
- 7.7 The Draft Local Plan proposes to draw down 17.7ha of existing safeguarded land and so, it is necessary to re-assess the availability of safeguarded land and to make further provision:
- Albrighton had 6.5ha of safeguarded land to the east which is entirely proposed for housing use on sites ALB017 and ALB021;
  - Alveley had no safeguarded land;
  - Shifnal had 21.6ha to the north, east and south of which 11.2ha were proposed for housing use in site allocations SHF013 (3.9ha), SHF015/SHF029 (3.8ha) and SHF022/SHF023 (3.5ha);
    - This left a residual area of 10.4ha of existing safeguarded land to the north of site allocation SHF023 which is currently inaccessible from the highway network.
- 7.8 The Draft Local Plan is the second successive Local Plan to make provision for development in the inset settlements of Albrighton, Shifnal and Alveley following the SAMDev Plan (2015). The SAMDev Plan drew down 67.1ha of existing safeguarded land:

- Albrighton allocated 9.4ha for housing development on ALB002;
- Shifnal provided an early release of 10ha at Coppice Green Lane and 3.2ha at The Uplands south of the A464 due to a shortfall in housing land in the County;
- Shifnal subsequently provided 17.8ha off Haughton Road in the north, 9.7ha between Stanton Road and the eastern rail line and 17ha to the north of the A464 along Wolverhampton Road through the SAMDev Plan.

7.9 Together the SAMDev Plan and Draft Local Plan identified 84.8ha of safeguarded land for development in the Inset Settlements leaving a residual area of 10.4ha of safeguarded land in Shifnal. This provision of safeguarded land over the two Plan periods would average 42.4ha for each Plan period. This was drawn exclusively from 95ha of safeguarded land around Albrighton and Shifnal.

7.10 The Table below shows the amount of safeguarded land around each Inset Settlement in each Local Plan period and beyond 2038.

Settlements	SAMDev Plan	Pre-Submission Draft Local Plan	
	Land Provision 2006 - 2026	Site Allocations 2016 - 2038	Safeguarded Land post 2038
	hectares		
<b>Albrighton</b>	11	7	20
<b>Aleveley</b>	0	2	4
<b>Shifnal</b>	59	50	93
<b>TOTALS</b>	<b>70</b>	<b>59</b>	<b>116</b>

7.11 The Draft Local Plan will save some SAMDev Plan allocations for development from 2022 to 2038. This would justify using the average levels of provision across the two periods from 2006-26 and 2016-38 to assess the future requirements for safeguarded land in the Inset Settlements. This average requirement for the SAMDev Plan and Draft Local Plan Land would be 64.5ha for each Plan period from a total provision of 129ha.

7.12 The proposed level of safeguarded land at 116ha in the Draft Local Plan is lower than the 129ha of safeguarded land proposed for development from 2006 to 2038 (32 years). This initial sensitivity test for safeguarded land provision might therefore suggest an under provision of safeguarded land.

7.13 The proposed 116ha of safeguarded land is however, intended to be the primary source of land for development. It is expected that other development options will also need to be considered, as required within current national policy but excluding the further release of Green Belt land. Therefore, the average level of provision in all the settlements within or adjoining the Green Belt averaged

64.5ha for each Plan period but only 42.2ha of safeguarded land was required for this development.

- 7.14 The assumption that other reasonable development options will be considered in Inset Settlements would indicate that 116ha of safeguarded land is a satisfactory level of provision.
- 7.15 If 116ha of safeguarded land is drawn down at the previous average rate of around 42ha for each 20 year Plan period (i.e. in the SAMDev and Draft Plans), then 116ha of safeguarded land alone would provide for more than two Plan periods starting from 2038 and again starting from 2058. This could variously provide:
- the first plan period from 2038 with 42ha leaving a residual supply of 74ha of safeguarded land for the period from 2058;
  - the first plan period from 2038 with 65ha leaving a residual supply of 52ha of safeguarded land for the period from 2058.
- 7.16 The evidence of a lower land provision on the site allocations in the Draft Local Plan (59ha) compared with the SAMDev Plan (70ha) also indicates the residual safeguarded land is likely to exceed 52ha.
- 7.17 This would be supported by the local policy objectives to achieve a more efficient use of development land in Shropshire. This is particularly true for employment development. The expectation for the safeguarded land to service two Plan period is also supported by the nation policy objectives to utilise a range of development options and solutions in Green Belt locations.
- 7.18 The safeguarding of land for future development tin Green Belt locations is addressed in the Green Belt Topic Paper. This states the rationale for identifying safeguarded land is:
- “...consistent with paragraph 143(e) of the NPPF which states in the context of defining Green Belt boundaries...(local authorities should)...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”.*
- 7.19 This was undertaken in accordance with NPPF paragraph 143(c) and it is determined that:
- “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”.*

7.20 The Council has also set out in the Green Belt Topic Paper at paragraph 8.31 its approach to preparing the separate Green Belt Revised Exceptional Circumstances Statement (**EV051**). In paragraph 8.31(e), the Green Belt Topic Paper states that the release of land from the Green Belt 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”.*

7.21 The Council has also set out in detail within the Green Belt Revised Exceptional Circumstances Statement (**EV051**) its specific approach to the release of safeguarded in each of the Inset Settlements.

*Question 8. Do the exceptional circumstances, as required by paragraph 140 (136) of the Framework, exist to justify the Local Plan’s proposed removal of land from the Green Belt, including safeguarded land?*

### **Shropshire Council Response:**

8.1 National policy in NPPF paragraph 141 requires strategic policy making authorities to demonstrate that all other reasonable options for meeting identified needs for development have been examined fully before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.

8.2 Authorities must first make as much use as possible of suitable brownfield sites and underutilised land, optimise the density of development in town and city centres and other locations well

served by public transport, and discuss with neighbouring authorities whether they could accommodate some of their identified need for development.

- 8.3 NPPF paragraph 142 highlights the importance of promoting sustainable patterns of development when reviewing and amending Green Belt boundaries, particularly the consequences 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.
- 8.4 NPPF paragraph 143 states alternative Green Belt boundaries 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.
- 8.5 This response to question 8 is supported by the Council's responses to questions 2, 3, and 4.

Make as much use as possible of capacity in built-up areas

- 8.6 The Council demonstrated that the spatial strategy for the distribution of development in Policy SP2(5) seeks to achieve a sustainable and appropriate pattern of development that maximises development opportunities in the urban areas in Schedule SP2.1.
- 8.7 This urban focus is explained in paragraphs 3.23 and 3.19 that:
- Policy SP2 presents a sustainable pattern of growth, directing the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support new development;
  - a sufficient supply of employment land, focused within the urban areas, has been provided to enable choice and competition in the market. The urban areas will also perform their economic roles in support of the employment needs of rural settlements and communities in the County.

- 8.8 The urban focus has been established through three key evidence sources for the Draft Local Plan:

Hierarchy of Settlements Assessment - determined the tiered settlement hierarchy for Shropshire. This identified the significant urban centres, their roles and functions and their suitability and sustainability for development. This selection was made from a total of 550 recognisable named settlements in the County.

Infrastructure Place Plans - Place Plans assisted the spatial strategy in directing development toward urban areas and named larger settlements where the available urban capacity would provide the greatest benefits for those communities. The Place Plans identified:



- where development might be directed to Inset Settlements to support communities in need of infrastructure investment;
- how the sustainability of urban and rural settlements might be supported whilst minimising the release of Green Belt land.

Sustainability Appraisal and Place Plan Site Assessments – sustainability appraisal and site assessment processes determined the suitability, developability and deliverability of available urban capacity sites within urban and rural settlements in the County.

Sustainability Appraisal - The purpose of this assessment was to identify how particular sites could contribute towards the delivery of a sustainable pattern of development across the County:

- it permitted an assessment of the urban capacity of settlements based on individual site assessments;
- it ensured 'planning balance' judgements considered the sustainability of sites in relation to environmental assets in and around settlements and facilities and services within settlements.

The sustainability appraisal also weighed in balance the protection of the Shropshire Hills Area of Outstanding Natural Beauty and other environmental assets in the County.

Place Plan Site Assessments - The assessment formed the core evidence for urban capacity based on technical assessments to determine the suitability and developability of sites. The site assessments were based on extensive consultations, a strategic assessment of the site and its contribution to a sustainable pattern of development, an informed planning judgement on the site as a potential development option and a recommendation as to preferred uses, phasing or protection of the site.

This included evidence from the Green Belt Assessment and the Stage 2 Green Belt Review to determine the contribution to Green Belt purposes and any harm from releasing sites.

Optimise the density of development on non-Green Belt sites and promote a significant uplift in minimum density standards

- 8.9 The Council demonstrated that the density of development is considered in the spatial strategy for both the delivery of housing and employment development. Density is considered as a means of ensuring the efficient use of land and the effective delivery of development to meet the needs of the County.
- 8.10 This has informed the spatial strategy through strategic policies, development management policies and settlement policies in the Plan. This approach seeks to identify an optimum allocation of land to meet the objective housing and employment land requirements.

8.11 This will reduce the burden development places on the open countryside including significant landscapes of the County, the Green Belt and Shropshire Hills Area of Outstanding Natural Beauty.

#### Housing

- the primary objective of the spatial strategy will be to achieve development densities around 30 dwellings per hectare and particularly in accessible urban centres within a spatial strategy with a prescribed 'urban focus';
- this will take effect through Policy DP3 Affordable Housing Provision which establishes the requirement to deliver on-site affordable housing in relation to proposed site capacities;
- this obligation is an important contributory factor to the delivery of the settlement residential guidelines in Policy SP7.

#### Employment

- the average density of employment development in Shropshire has been 26% set against the standard of 40% nationally;
- this serves to underestimate the volume of employment land required to meet the employment needs of the population;
- the spatial strategy seeks an improvement to the density of employment development through the guidelines for new employment allocations in key settlement polices;
  - this is achieved by setting out the total area of the employment allocations and indicating the developed floorspace at a standard density of 40%.

Discussions with neighbouring authorities about whether they could accommodate some identified housing and employment land needs

8.12 The Council demonstrated that:

- the opportunity to meet Shropshire's development needs outside the County was explored to avoid the release of Green Belt land but no options could be identified;
- a letter to neighbouring Local Authorities asked whether there was suitable, available and deliverable land within their area which would functionally serve locations in east Shropshire;
- Neighbouring Local Authorities highlighted a range of issues as to why options could not be identified, these included:
  - significant distances from the locations in Shropshire with inter-related sustainability issues;
  - lack of correlation with the functional economic and/or housing market areas in Shropshire;
  - mismatch with the timing of plan preparation in Shropshire;
  - their own need for Green Belt land releases and constraints and challenges in meeting their own housing needs.

## Exceptional Circumstances

- 8.13 It is recognised that the Draft Local Plan still proposes to release land from the Green Belt however:
- the need for housing development across the County to meet the objectively assessed need only requires the release of 1.4ha of Green Belt land and mixed-use developments only require the release of 2.4ha;
  - a significant requirement for 50.4ha of employment land has been met around the significant settlements of Bridgnorth (11.4ha) and Shifnal (39ha);
  - The greater release of Green Belt land is to :
    - safeguard land (comprising 116.3ha) for future development in Shropshire beyond 2038 at Albrighton, Shifnal and Alveley;
    - avoid the unnecessary protection within the Green Belt of land that is not permanently open (214.2ha) at RAF Cosford.
- 8.14 The Council consider that exceptional circumstances exist for the release of this Green Belt land and to redefine the Green Belt boundaries. These exceptional circumstances are summarised in the Green Belt Release (Revised) Exceptional Circumstances Statement (**EV051**) for:
- Albrighton paragraphs 5.49 to 5.66;
  - Alveley paragraphs 6.9 to 6.36;
  - Bridgnorth paragraphs 7.66 to 7.98;
  - Shifnal paragraphs 8.88 to 8.156;
  - RAF Cosford paragraphs 9.74 to 9.98.

*Question 9. Does the Local Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?*

### **Shropshire Council Response:**

- 9.1 The Draft Local Plan (**SD002**) recognises that re-defining Green Belt boundaries and releasing land from the Green Belt requires Local Plans to satisfy national policy in paragraphs 142 and 145.
- 9.2 The Shropshire Green Belt Assessment (**EV049.01**) identifies in paragraph 2.52 potential opportunities for compensatory improvements to the remaining Green Belt.
- 9.3 The Shropshire Green Belt Review (**EV050.01**) identifies in paragraphs 3.76 and 3.77 that any compensatory improvements to the environmental quality or accessibility of remaining Green Belt

land should primarily take effect on and around the land being removed from the Green Belt.

- 9.4 In Chapter 5 , these measures are described in Table 5.2 seek to positively encourage the beneficial use of the remaining Green Belt by the residents or users of any new development and by the wider urban community in accordance with NPPF paragraph 145. These measures are considered to be 'enhancements' to the Green Belt that target the environmental quality of the remaining land.
- 9.5 This may be achieved by strengthening boundary/buffer treatments to give a greater sense of permanence to the redefined boundary and providing access through the boundary with environmental enhancements to positively influence the visual character of the countryside and to enhance the sense of openness in the remaining Green Belt.
- 9.6 These positive influences gain greater effect by facilitating public access from the development to the Green Belt beyond. This enables the community to experience both the enclosure of the new urban development and the open character of the Green Belt countryside beyond providing amenity and recreation opportunities in an area of relative tranquillity.
- 9.7 These enhancements may be considered to be conditional compensatory improvements related to the scale of the land release and the proposed development. They are additional to any 'design principles' intended to directly mitigate for the development process. These conditional improvements may occur where the scale of the proposal would necessitate a greater investment in the green and blue infrastructure for the proposed development.
- 9.8 These objectives are contained in Policy SP11(8) intended to inform the release of site allocations on land removed from the Green Belt and to support the determination of planning permissions adjoining the Green Belt or in exceptional circumstances, within the Green Belt. This is explained in paragraph 3.108 of the Policy Explanation:
- "3.108. Potential opportunities for enhancing the beneficial use of the Green Belt exist and need to be positively planned for as required by NPPF paragraph 142. The Green Belt Review evidence prepared to support the Local Plan sets out some potential mitigation measures that can be applied to improve the quality and accessibility of Green Belt and reduce the potential harm where land is taken out from the Green Belt including, integrative landscaping, reinforcement of Green Belt boundaries, appropriate development design and layout and provision of access/enhanced access. Such measures are specifically identified in site guidelines where Local Plan allocations are proposed in Green Belt locations.*

*However, there will be other opportunities to encourage the enhancement of Green Belt, including when unallocated development comes forward in Green Belt, and the policy recognises this. Additionally, it will be expected that when safeguarded land is allocated for development within a future Local Plan, that it will provide compensatory improvements to wider Green Belt."*

- 9.9 The Green Belt Release - Revised Exceptional Circumstances Statement (**EV051**) identifies opportunities for enhancing the beneficial use of the Green Belt for the Inset Settlements of Albrighton, Alveley and Shifnal and for Bridgnorth's eastern 'inset' satellite employment development at Stanmore Industrial Estate.

**Albrighton** - land proposed for release from the Green Belt is to be safeguarded for development beyond the Draft Local Plan period, as such, it is more challenging to achieve compensatory improvements to the Green Belt through the Local Plan Review.

**Alveley** – development guidelines at The Cleckars identify opportunities to enhance footpath links from the site to the existing rights of way network in the Green Belt. The design and layout of development should retain mature trees and hedgerows and provide additional planting to minimise the visual encroachment into the Green Belt and to reinforce the Green Belt boundaries.

Daddlebrook Road requires retention of mature trees and hedgerows with enhanced planting where possible, particularly at the northern and eastern boundaries to minimise visual encroachment into the Green Belt and to reinforce the boundaries.

The Bridgnorth Place Plan also identifies scope around Alveley to:

- improve the wider cycle and pedestrian network by developing bridleways into a shared 'trail network' for walkers, cyclists and horse-riders and improving footpaths to allow 'level access';
- provide local highway improvements and specifically the provision of passing places on access roads to the Severn Valley Country Park which offers 126 acres of accessible countryside.

**Shifnal** - Land east of Shifnal Industrial Estate (SHF018b and SHF018d) includes measures to ensure:

- Careful consideration to the creation of an effective boundary to the north, east and south of the development to strengthen the Green Belt boundary around the site;
- The SuDS infrastructure located to the south-east of the site will be designed and landscaped with a 'parkland' character as part of the Green Infrastructure and to provide public access.

**Shifnal** - Safeguarding of land at Lodge Hill includes the following indicative measures to ensure:

Land between A464 (south) and Park Lane:

- A new public footpath link could be provided from Park Lane, in order to create links with the proposed residential properties, the surrounding countryside and Shifnal town;
- proposed open space to the south-west could soften the built edge against the Green Belt, giving access to the surrounding countryside and softening views from Lodge Hill to the west.

Land between Park Lane and A4169 / western rail line at Lodge Hill:

- provide sufficient additional land to deliver environmental and recreational improvements to the south, offsetting the loss of Green Belt with compensatory improvements;
- provide pedestrian links to the existing public rights of way to the west and east particularly to enhance the circular walk on public rights of way over Lodge Hill;
- existing hedges defining the edge of the proposed safeguarded land can be reinforced with additional planting to create a strong buffer between the development and the Green Belt.

**Bridgnorth** – the release of land around Stanmore Industrial Estate includes measures to ensure:

land north of Stanmore Industrial Estate (P58a) will provide :

- substantial and effective boundary treatments, to create a buffer around the site and make a positive link to nearby woodland;
- retain public right of way along part of the site's southern boundary.

land adjacent Hickman Road, Stanmore Industrial Estate (STC002) will provide:

- substantial and effective boundary treatments, to create a buffer around the site, forming an effective buffer to The Hobbins and other residential properties;
- compensatory investment in the quality of Stanmore Country Park within the Green Belt.

*Question 10. Are all the sites proposed for release or safeguarding and their boundaries clearly shown on a map?*

**Shropshire Council Response:**

10.1 The Draft Local Plan (**SD002**) describes the Green Belt land releases in Policy SP11(1) & (2) and in paragraphs 3.96, 3.100, Table SP11.1 and 3.103 of the Policy Explanation.

10.2 Table SP11.1 (below) identifies the Green Belt land releases by location, type of land use or designation and land area.

<b>Table SP11.1: Green Belt Release by Location and Type</b>						
<b>Location</b>	<b>Housing (ha)</b>	<b>Mixed Use (ha)</b>	<b>Employment (ha)</b>	<b>Strategic Site (ha)</b>	<b>Safeguarded Land (ha)</b>	<b>Total (ha)</b>
Albrighton	-	-	-	-	19.9	<b>19.9</b>
Alveley	1.4	2.4	-	-	3.6	<b>7.4</b>
RAF Cosford Strategic Site	-	-	-	214.2	-	<b>214.2</b>
Shifnal	-	-	39.0	-	92.8	<b>131.8</b>
Stanmore (Bridgnorth)	-	-	11.4	-	-	<b>11.4</b>
<b>Total</b>	<b>1.4</b>	<b>2.4</b>	<b>50.4</b>	<b>214.2</b>	<b>116.3</b>	<b>384.7</b>

10.3 These Green Belt land releases are shown on the Policies Map in the following Core Documents available at:  
<https://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/core-submission-documents/>.

**S1. Draft Albrighton Place Plan Area Inset Maps.pdf (SD005.01)** where:

- Albrighton, land to be removed from the Green Belt and safeguarded for future development is shown blue on Inset Map;
- RAF Cosford, land proposed to be removed from the Green Belt as a Strategic Site is excluded from the Green Belt designation on the Policies Map for Albrighton.

**S3. Draft Bridgnorth Place Plan Area Inset Maps.pdf (SD005.03)** where:

- Alveley, land is proposed to be removed from the Green Belt for:
  - proposed housing allocation shown brown on Inset Map;
  - mixed use shown as grey cross-hatching on Inset Map;
  - safeguarded for future development shown blue on Inset Map.
- Stanmore Industrial Estate, land proposed to be removed from the Green Belt as employment allocations are shown purple on Inset Map, located to the east of Bridgnorth.

**S15. Draft Shifnal Place Plan Area Inset Maps.pdf**

**(SD005.015)** where:

- Shifnal, land is proposed to be removed from the Green Belt for:
  - proposed employment allocation shown purple on Inset Map;
  - safeguarded for future development shown blue on Inset Map:
    - adjoining the settlement boundary to the east;
    - adjoining the settlement boundary from south to west.
  - existing safeguarded land next to SHF023 to the south-west.



## Appendices



## Appendix 1 - Settlement Assessments and Conclusions

The effect of the Green Belt land releases in the Inset Settlements and other locations are summarised for each settlement in the Table below. This shows the relative effect of each land release to the overall potential effects of releasing land from the Green Belt around that particular settlement and the availability of alternative development options in that settlement.

Settlement	Site	Location	Proposed use	Comparable Brownfield Option	Green Belt Parcels	Opportunity Areas	Harm of Release				Settlement Harm Ratings	
							Main Area	Sub-Areas		upper	lower	
Albrighton	ALB014	Cross Rd. Albrighton (7ha)	Safeguarding	No	P36	Ab-2	High	Moderate			High	Low-Moderate
	P35	Kingswood Rd to By-Pass (6.6ha)	Safeguarding	No	P35	Ab-2	High	Moderate				
	P32a	Railway to By-pass (6.3ha)	Safeguarding	No	P32	Ab-1	High	Low-Moderate				
Alveley	ALV006 / ALV007	North Daddlebrook Rd. (2.4ha)	Mixed Residential Use	No	P70	Av-1	High	Moderate			High	Low-Moderate
	ALV009	Adjacent The Cleckars (1.4ha)	Residential	No	P72	Av-2	Moderate - High	Low-Moderate				
	ALV002 / P70	off Crooks Cross (3.4ha)	Safeguarding	No	P70	Av-1	High	Moderate				
Bridgnorth	P58a	North Stanmore Ind.Est. (6.8ha)	Employment	No	P58	BN-2 / BN-3	High	Moderate	Moderate		High	Low-Moderate
	STC002	Hickman Rd. Stanmore Ind.Est.	Employment	No	P57	BN-2 / BN-3	High	Moderate	Moderate			
RAF Cosford	P28 / P40	Military Camp (brownfield) except south-east airfield (214.2ha)	Inset Site	N/A	P28	Co-1	Moderate - High	Moderate	Low - Moderate	Moderate - High	Moderate - High	Low-Moderate
			Inset Site	N/A	P40	Co-1	Moderate - High	Moderate	Low - Moderate			
Shifnal	SHF018d	East of Upton Lane (25ha)	Employment	No	P13	Sh-1	High				Hgh	Moderate
	SHF018b	West of Upton Lane (14ha)	Employment	No	P14	Sh-1	High					
	P14	Stanton Rd. & Lamledge La.	Safeguarding	No	P14	Sh-1	High					
	P14	Hillcrest Shifnal School (9.4ha)	Safeguarding	No	P14	Sh-1	High					
	SHF019VAR	A464 to Park Lane (10ha)	Safeguarding	No	P15b	Sh-1	High	Moderate				
	P16	Lodge Hill Farm (25.2ha)	Safeguarding	No	P16	Sh-2	High					
	SHF017	Land North & South of A4169 (33.7ha)	Safeguarding	No	P17	Sh-3	High	High				

The detailed evidence of any harm caused by releasing any of the 29 Opportunity Areas is explained in detail in the Stage 2 Green Belt Review. The Study Report identifies the land parcels within each Opportunity (or Sub-Opportunity) Area. The contribution made by these land parcels to the four main Green Belt purposes is explained in the findings of the Green Belt Assessment.

The sustainability of the Green Belt land releases in the Inset Settlement are summarised for each settlement in the Table below. This shows the relative benefits of each land release to the overall potential benefits of allocating sites in that particular settlement.

Settlement	Site	Location	Proposed use	Sustainability Ranking		Partially Brownfield	Environmental Impacts			Accessible Facilities			Settlement Sustainability Scores	
				Rank	Score		Natural	Historic	Landscape	Public Transport Nodes	Services	Recreation	upper	lower
Albrighton	ALB014	Cross Rd. Albrighton (7ha)	Safeguarding	Good	-1	-	Yes	Yes	Medium	Yes	Yes	Yes	Good +1	Poor -11
	P35	Kingswood Rd to By-Pass (6.6ha)	Safeguarding	Good	-3	-	No	Yes	Medium	Yes	Yes			
	P32a	Railway to By-pass (6.3ha)	Safeguarding	Fair	-6	-	No	Yes	Medium	Yes	Yes			
Aveley	ALV006 / ALV007	North Daddlebrook Rd. (2.4ha)	Mixed Residential Use	Good	-3	-	No	Yes	Medium	Yes	Yes	Yes	Good -1	Poor -7
	ALV009	Adjacent The Cleckars (1.4ha)	Residential	Good	-3	-	No	Yes	Medium	Yes	Yes	Yes		
	ALV002 / P70	off Crooks Cross (3.4ha)	Safeguarding	Fair	-4	-	Yes	Yes	Medium	Yes	Yes	Yes		
Bridgnorth	P58a	North Stanmore Ind.Est. (6.8ha)	Employment	Fair	-7	Yes	No	No	Medium	No	No	No	Good +3	Poor -14
	STC002	Hickman Rd. Stanmore Ind.Est.	Employment	Fair	-5	Yes	No	No	Medium	Yes	No	No		
RAF Cosford	P28	Military Camp (brownfield) except south-east airfield (214.2ha)	Inset Site	Fair	-8	Yes	Yes	Yes	Medium	Yes	Yes		Good +2	Poor -21
	P40		Inset Site	Fair	-9	Yes	Yes	Yes	Medium	Yes	Yes			
Shifnal	SHF018d	East of Upton Lane (25ha)	Employment	Fair	-9	-	No	No	Medium	No	No	No	Good -3	Poor -13
	SHF018b	West of Upton Lane (14ha)	Employment	Fair	-9	-	No	No	Medium	No	No	No		
	P14	Stanton Rd. & Lamledge La.	Safeguarding	Fair	-6	-	Yes	No	Medium	No	Yes			
	P14	Hillcrest Shifnal School (9.4ha)	Safeguarding	Fair	-6	Yes	Yes	No	Medium	No	Yes			
	SHF019VAR	A464 to Park Lane (10ha)	Safeguarding	Fair	-9	-	No	No	Medium	No	No	No	Good -1	Poor -15
	P16	Lodge Hill Farm (25.2ha)	Safeguarding	Fair	-10	-	Yes	Yes	Medium	No	Yes	Yes		
	SHF017	Land North & South of A4169 (33.7ha)	Safeguarding	Good	-5	-	Yes	Yes	Medium	Yes	Yes	Yes		

The evidence on Green Belt land releases is contained in the Stage 3 site assessment forms contained in the Sustainability Appraisal and Place Plan Site Assessments for Albrighton, Bridgnorth, Shifnal and the Strategic Sites (**SD006.03**, **SD006.05**, **SD006.17** and **SD006.21**). This is supported by the evidence of the comparative sustainability of these land releases in the Sustainability Appraisal assessment forms in the same documents.