

6. Matter 6 – Green Belt and Safeguarded Land (policy SP11)

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref	A0410 – CPRE Shropshire
Matter	6 – Green Belt and Safeguarded Land (policy SP11)
Relevant question nos	All, but particularly 8

6.1 The Main Modifications to policy SP11 that we proposed at the Regulation 19 stage were:

SP11 Green Belt and Safeguarded Land

8.10 *Because of the doubts about the quantum of the proposed releases from the Green Belt, the figures should be re-examined.*

8.11 *Text should be added after clause 3b in line with paragraph 8.9, which stated:*

8.9 *Green Belt land is important not only for the five purposes in NPPF 134 but also for its natural capital value. In presenting a “very special circumstances” case (clause 3b) applicants should be required to quantify:*

- i) lost food production value per hectare at current productivity rates, and what that means for UK self-sufficiency;*
- ii) lost carbon absorption in tonnes per hectare; and*
- iii) lost biodiversity value.*

6.2 Shropshire Council’s response in SD014.01, Schedule 2: Page 724 (electronic page 774) was:

Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.

Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.

Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.

Shropshire Council considers the approach to establishing whether 'very special circumstances' exist to justify development within the Green Belt outlined within draft Policy SP11 and the National Planning Policy Framework (NPPF) is appropriate.

- 6.3 This response, understandably, effectively says simply that Shropshire Council thinks their approach is appropriate. The approach may be appropriate but the actual evidence of exceptional circumstances remains thin.
- 6.4 Shropshire Council has now provided document GC4g, the Green Belt Topic paper, as part of the new evidence requested by the Inspectors, and before that also document EV051 the updated Green Belt Release Exceptional Circumstances Statement, created immediately before the Regulation 19 consultation started.

Question 8

- 6.5 Question 8 under Matter 6 is:

Do the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the Local Plan's proposed removal of land from the Green Belt, including safeguarded land?

- 6.6 GC4g and EV051 effectively say that there is great demand for land in the eastern corridors, particularly around the M54 and Shifnal, that centres there have been constrained by the Green Belt, that it is not possible to find allocations to meet Shropshire Council's guideline targets for housing and employment land without using the Green Belt, and that lots of land parcels round there have been promoted for development.
- 6.7 These seem to be exceptional circumstances only if the stance is taken that development should occur wherever there is pressure for it, rather than taking the stance that the Green

Belt is there for its original purposes, which include a check on urban sprawl (NPPF 138a), and to assist urban regeneration (NPPF 138e).

6.8 GC4g does now include its helpful Table 2, listing the proposed releases from the Green Belt. Even if exceptional circumstances are accepted, nowhere does it or EV051 explain why it should be thought necessary to release the particular amount of 116.3 Ha of Green Belt land for safeguarding purposes. How has that figure actually been arrived at, particularly the figure of 92.8 Ha for Shifnal?

6.9 As noted in paragraph 5.24 above, there seems to be particular doubt as to how Shifnal's employment land guideline figure of 41 Ha has been arrived at, and therefore whether it is justified. Part of that doubt stemmed from the statement at paragraph 8.40 of EV051, as noted at paragraph 19.8 of our Regulation 19 submission.

6.10 We have therefore not changed our stance as at paragraph 6.1 above that:

Because of the doubts about the quantum of the proposed releases from the Green Belt, the figures should be re-examined.

6.11 That includes the release of the Green Belt land at RAF Cosford. Development associated with military activity has occurred there over the years, despite it being in the Green Belt, and no new evidence has been put forward why the future needs associated with its military use require it to be released from the Green Belt.