

Hearing Statement for the Shropshire Council Local Plan Examination

Matter 6 – Green Belt and Safeguarded Land (Policy SP11)

Statement on Behalf of the Stanmore Consortium Ref: A0497

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor Unique Part A Ref:	A0497
Matter	6
Relevant Question No.s	1-6, 8 & 9

Stage 1 Hearing Statement

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1. Introduction

- 1.1. This Hearing Statement is on behalf of The Stanmore Consortium “TSC” (Apley Estate and Stanmore Properties) and should be read in conjunction with previous representations made on behalf of TSC at the Regulation 18 and 19 Stages.
- 1.2. In 2017 Shropshire Council approached TSC with a view to delivering proposals for a Garden Community for the future housing and employment needs of Bridgnorth on land owned by TSC.
- 1.3. In November 2018 the Shropshire Local Plan Review: Consultation on Preferred Sites was published with a masterplan mixed use garden settlement at Stanmore, initiated by the Council, as a Preferred Site. This followed extensive discussion between the Council and TSC, public consultation and provision of detailed information requested by the Council.
- 1.4. In April 2020 the Council abruptly changed its position on the Stanmore Garden Community proposal to an alternative on land west of Bridgnorth, not previously promoted nor consulted upon. This alternative was included in the Regulation 18 and 19 Stages of the Local Plan.
- 1.5. TSC has continued to promote Stanmore Garden Community as the best option for Bridgnorth and Shropshire.
- 1.6. This Hearing Statement focusses on those specific questions which are directly relevant to TSC’s position.

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

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?

- 2.1. TSC considers the Green Belt review is unsound, the methodology applied unsound and the Council's approach to the assessment erroneous.
- 2.2. It is important to recognise that the Green Belt designation within Shropshire is to prevent the eastern expansion of Telford and the western expansion of the West Midlands, notably Wolverhampton. Whilst Bridgnorth is not fully inset within the Green Belt; it is not the intention or purpose of the Green Belt to prevent its growth.
- 2.3. The justification for the Green Belt Review arises from the Report of the Examination of the SAMDev Plan, adopted in 2015. The Inspector recognised the need to open up new areas to accommodate the long-term future of the key towns in Shropshire. The reasoning in respect of Bridgnorth is set out in paragraph 189 and 190 of the Inspectors Report.
- 2.4. The Council Green Belt Topic Paper¹, Paragraph 6.7, states that the Council are under a specific direction, reflected within the adopted Local Plan to undertake a Green Belt review.
- 2.5. Shropshire Council's Green Belt Assessment in 2017 states the overall aim is to provide Shropshire Council with an objective; evidence based; and independent assessment of how the Shropshire Green Belt contributes to the five Green Belt purposes, as set out in national policy at paragraph 138 of the NPPF. It assesses the relative performance of the Green Belt; not what adjustments should be made to it.
- 2.6. TSC has real concerns regarding the approach taken to the Review. In TSC's Regulation 18 and 19 submissions, Consultants EDP reviewed the methodology used in the Council's Green Belt Review. They found the methodology used fell short of a thorough testing of Purpose 3². Their review of the evidence base concluded the depth of testing was limited, and the considerations insufficient to examine overall performance against all five Green Belt purposes. Their findings are set out in the Green Belt Position Note, that accompanied the Regulation 18 Representation (**Appendix 1**).
- 2.7. EDP undertook their own assessment (**Appendix 2**). In respect of Purpose 3, they found sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, such as land to the west of Bridgnorth, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character

¹ February 2022

² Appendix B of the Consortiums Regulation 18 Representations and Appendix 1 of this document

area or contains features that are in poorer condition. This allows a relative and qualitative ‘value’ element to be applied to landscapes.

- 2.8. EDP found the matter of ‘encroachment’ is also a judgement, that considers whether or not development (such as built form along the edge or within it, pylons and overhead cables, substations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 2.9. On the basis of the finding of the EDP Report TSC consider that the methodology is not soundly based.

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?

- 2.10. The landscape and visual impact of developing a non-Green Belt sites has not been fully considered
- 2.11. In releasing non-Green Belt sites in the countryside the Council has failed to have regard to the need to deliver employment development in locations to attract and deliver sustainable inward investment in accordance with the strategic objectives of the Plan.
- 2.12. TSC acknowledged the Council’s Green Belt Exceptional Circumstances Statement (December 2020), that there are limited opportunities in the current Local Plan for development within built-up areas and for infill development in the Green Belt, and beyond the main settlements of Albrighton, Shifnal and Bridgnorth. In relation to employment the industrial estates at Alveley and Stanmore are also inset in the Green Belt.
- 2.13. A Green Belt review to consider options for future development needs is recognised in the SAMDev Plan which recognised that there was limited capacity within the built-up areas outwith the Green Belt; in the explanatory text to Policy MD6 it states at Paragraph 3.48:

“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.”
- 2.14. This reflects the SAMDev Plan Inspector’s conclusions and recommendation for an early review of the Local Plan including a detailed review of the Green Belt boundary. The Inspector also acknowledged that the “tightly constrained” east side of Bridgnorth has *“limited the options available to the town in the SAMDev Plan. The CS emphasises Bridgnorth’s role as a focal point which contrasts with strongly felt local views of a historic town that should be preserved at its current size. Most of the opportunities in and around Bridgnorth for infill development and small additions to the town have been used up.”*
- 2.15. The Council’s Green Belt Exceptional Circumstances Statement, December 2020 demonstrates that exceptional circumstances exist for the release of the land for proposals, e.g. at Stanmore

in Bridgnorth, the Council has confirmed that the employment requirement cannot be met outwith the green belt on brownfield sites, or by increasing the density or within the neighbouring authorities.

- 2.16. Therefore, the Council accepts that there is insufficient capacity within built up areas to accommodate the Growth Strategy proposed in the Local Plan.
- 2.17. Areas east of Bridgnorth within the Green Belt assessed in EDP’s report actually perform poorly (weak) against all the NPPF’s Green Belt purposes (relative to GB Purpose 1, 2, 4 and 5 with Purpose 3 scoring moderately) and make a limited contribution to the fundamental purpose of Green Belt, which is to keep land between settlements permanently open. They concluded that with the need to deliver new economic development and housing at the most sustainable locations, the land adjacent to Stanmore Industrial Estate should be considered for release from the Green Belt as part of the Local Plan review process.
- 2.18. With regard to non-Green Belt countryside, TSC considers the Council’s examination of potential sites has not been robust, particularly in respect of landscape and visual impact. E.g. in Bridgnorth, the land proposed for Tasley Garden Village to the west of the settlement, there has been no regard to the landscape and visual qualities of the area. The EDP Landscape and Visual Assessment (March 2020) (**Appendix 2**), prepared on behalf of TSC found that the land to the west of Bridgnorth:-
- is situated in ‘deep countryside’,
 - there are no visual connections to the urban area
 - development would form a significant intrusion into the otherwise scenic rural landscape, it
 - is highly visible from numerous publicly accessible locations to the south and west.
 - views of the Tasley site and its immediate surroundings are rural in character and feel, by reason of its isolation from the existing settlement of Bridgnorth.
- 2.19. EDP concluded it was not a suitable location for Bridgnorth’s new Garden Village. This conclusion was corroborated by the Council’s LVSS that describes the parcel that includes Tasley as having “...a strong sense of remoteness and tranquillity away from the main roads which is vulnerable to loss or erosion due to visual or noise disturbance from new development.” The change in landscape character of this rural landscape to an urban extension would be apparent across the wider landscape and harm the current deeply rural character, with no natural boundaries. The fact the site is not Green Belt does not trump those matters.
- 2.20. EDP concluded that the landscape and visual impact of development to the west of Bridgnorth to be much greater than to the east. TSC consider the landscape and visual impact of developing a non-Green Belt sites has not been fully considered and weighed up against the exceptional circumstances which exist for alternative Green Belt sites. In considering potential options the Council has failed to have full regard to the landscape and visual impact, some which are highly sensitive to development.

- 2.21. The Council has also failed to take into consideration the need to deliver employment development in locations providing the best opportunity to attract and deliver sustainable inward investment in accordance with the strategic objectives of the Plan. They have ignored the fundamental importance to businesses of ‘location’ in the allocation of employment land which is essential to the delivery of sustainable and viable employment development. E.g. allocating land to the west of Bridgnorth away from other businesses in the town.
- 2.22. A likely implication of poorly located employment sites is reduced occupier demand, which will affect the overall viability and ultimately the deliverability of the development. The Council has failed to properly consider this issue, which can have implications for the sustainable delivery of employment development. For example, this is the Council’s approach to the west of Bridgnorth.

Question 3:

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

- 2.23. The need cannot be met from brownfield sites, increased density or across the boundary and therefore it needs to be met around the edge of Bridgnorth.
- 2.24. It’s considered that there are limited opportunities to maximise capacity on non-Green Belt sites as acknowledged by the need to undertake a review of the Green Belt in the SAMDev.
- 2.25. The Council’s Green Belt Exceptional Circumstances Statement December in respect of Bridgnorth states paragraph 7.59 that in proposing the release of Green Belt land at Stanmore, other locations outwith the Green Belt are *“unlikely to appeal in the same way to existing businesses on Stanmore Industrial Estate and other businesses in the key sector present on Stanmore Industrial Estate, given that a key part of its appeal is its existing reputation and the cluster of existing businesses in the engineering and advanced manufacturing sector which create ‘critical mass’. As such they will not make the same contribution to achieving the aspirations of the Local Plan, the Shropshire Economic Growth Strategy (2017-2021) and the vision of The Marches LEP as identified within their SEP (2019).”*
- 2.26. The unmet housing and employment need is an exceptional circumstance. The location should follow the stages of NPPF paragraph 137.
- 2.27. As demonstrated in the TSC Regulation 18 and 19 submissions, the needs of Bridgnorth cannot be met from brownfield sites, increased density or across the boundary and therefore must be met around its periphery. The Council acknowledge a compelling case to focus development at Stanmore Industrial Estate, and create an engineering and advanced manufacturing sector ‘critical mass’ to meet the aspirations of the Local Plan, the Shropshire Economic Growth Strategy (2017-2021) and the vision of The Marches LEP identified within their SEP (2019).

Question 4

Have discussions taken place with neighbouring authorities about whether they could accommodate some of Shropshire’s identified housing and employment land needs?

- 2.28. The identified development aspirations cannot be achieved in neighbouring Local Authorities. This is acknowledged in the Green Belt Topic Paper, February 2022, which confirmed that adjoining authorities were consulted on whether they had suitable, available and deliverable sites to functionally serve the geographical locations identified for growth; no suitable sites were identified.

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?

- 2.29. The Green Belt Review concluded that to achieve the vision and objectives identified within the Shropshire Local Plan Review, targeted Green Belt release is specifically required to support the short, medium and/or long-term growth requirements and aspirations associated with the following locations in the east of Shropshire: Albrighton, Alveley, Cosford, Shifnal and Stanmore (Bridgnorth).
- 2.30. The Green Belt Review was identified in the SAMDev Plan, within Policy MD6, which set out clearly the need to review boundaries for future development, as part of considering sustainable growth options.
- 2.31. This reflects the SAMDev Plan Inspector’s conclusions and recommendation who highlighted the need for an early review of the Local Plan including a detailed review of the Green Belt boundary.
- 2.32. In considering Green Belt releases the need to promote sustainable patterns of development is a key factor, as stated in the DfT’s 2021 “Decarbonising Transport – A Better Greener Britain”
‘The planning system has an important role to play in encouraging development that promotes a shift towards sustainable transport networks and the achievement of net zero transport systems.’
- 2.33. The opportunities for development identified by the Council do not reflect the need for communities to be able to meet a greater proportion of their own needs, for places to be better oriented to people, for mobility to be planned at a level where people can conveniently and genuinely walk and cycle and environmental impact. For example, in Bridgnorth identifying strategic growth to the west of the town at Tasley will result in four times more external traffic which will interact with local traffic from homes to the west relative to homes to the east, exacerbating already congested roads and increasing pollution in the town.
- 2.34. There has been no robust evidence produced by Shropshire Council to demonstrate that sites identified promote sustainable patterns of development and would be well served by public transport.

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?

- 2.35. The unmet employment and housing need within the Black Country is not being effectively addressed in the Plan. The incorporation of up to 30 hectares to support the employment needs of the Black Country Plan and 1,500 dwellings to support their housing needs is not sufficient, in quantitative and qualitative terms.
- 2.36. This will impact on Policy SP2 “Strategic Approach” which seeks to ensure that Shropshire will flourish, accommodating investment and new development that contributes to meeting the needs and making its settlements more sustainable. The need to increase housing and employment contributions to meet the needs of the Black Country housing and employment market areas would also help to support Policy SP12 which seeks to promote Shropshire’s economic potential.
- 2.37. The Black Country Authorities have requested that the Plan should recognise that there could continue to be a shortfall of land in neighbouring areas which could be accommodated within the Plan area. This must be recognised in the Plan and will lead to more land being released from the Green Belt.

Question 8

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?

- 2.38. The basis for the Green Belt Review is the SAMDev Plan, within Policy MD6, which sets out clearly the need to review boundaries and consider options for future development, as part of looking at sustainable growth options.
- 2.39. This reflects the SAMDev Plan Inspector’s conclusions and recommendation who highlighted the need for an early review of the Local Plan including a detailed review of the Green Belt boundary.
- 2.40. The Council’s Green Belt Review concluded that to achieve the vision and objectives identified within the Shropshire Local Plan Review, targeted Green Belt release is required. Specifically, release is required to support the short, medium and/or long-term growth requirements and aspirations associated with the following locations in the east of Shropshire: Albrighton, Alveley, Cosford, Shifnal and Stanmore (Bridgnorth). The exceptional circumstances are set out for each location within the Council’s Exceptional Circumstances Statement December 2020.

- 2.41. The Council make a very clear and strong case for exceptional circumstances to justify the release of Green Belt at Stanmore (Bridgnorth) for employment at (paragraphs 7.66 – 7.92):
1. Supporting to role of Stanmore Industrial Estate
 2. Supporting medium and long term needs of businesses
 3. Attracting new businesses including engineering and advanced manufacturing
 4. Supporting the Strategic role of Bridgnorth
 5. Supporting the Aspirations of the Economic Growth Strategy for Shropshire
- 2.42. The exceptional circumstances set out by the Council for the Green Belt release for employment land at Stanmore is supported. It is considered that the justification provided also supports the strategic release of land at Stanmore for housing and employment, such an approach underpins the urban focus in the Shropshire Local Plan. TSC draw the Inspector’s attention to the Councils Exceptional Circumstances Statement, Paragraph 7.84 – 7.90.
- 2.43. In TSC’s Regulation 18 and 19 Representations, exceptional circumstances exist to release land for development to the east of Bridgnorth at Stanmore.
- 2.44. Exceptional circumstances were set out in TSC’s representations to justify changes to the Green Belt boundaries. A July 2020 report by Stansgate Planning (**Appendix 3**) includes Leading Counsel’s opinion³, which provides a legal interpretation of what exceptional circumstances means and how it can be applied at Stanmore. At Stanmore, there are a number of matters that cumulatively amount to exceptional circumstances. It is concluded that the removal of land from the Green Belt at Stanmore is justified by:
- Supporting the role of Stanmore Industrial Estate (see para 1.17 above);
 - Supporting the medium and long-term needs of existing businesses (see para 1.24 above);
 - Attracting new businesses, particularly those in the ‘engineering and advanced manufacturing’ sector (see paras 1.24, 1.26 above and 1.42);
 - Supporting the strategic role of Bridgnorth (as set out at para 1.42 above);
 - Supporting the aspirations of the Economic Growth Strategy for Shropshire (see paras 1.24, 1.26 above and 1.42);
 - Provision of market and affordable housing in a sustainable location

³ Appendix L of Appendix 3

Question 9:

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

- 2.45. No, this element of the Plan is not considered to be justified or positively prepared and is not considered sound as set out below.
- 2.46. Whilst compensatory improvements measures are identified in the Council's Green Belt Exceptional Circumstances Statement, there is no evidence of any early engagement with landowners on compensatory measures, as required by the NPPG; this includes TSC in relation to the expansion of Stanmore Business Park and its removal from the Green Belt.
- 2.47. The NPPG on Green Belts advises that, where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.
- 2.48. Identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:
- land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought.
 - the scope of works that would be needed to implement the identified improvements.
 - the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible.

Appendix 1 - Reg 18 - Green Belt Position Note - prepared by EDP

Stanmore Village, Bridgnorth Green Belt Position Note edp5653_r004c

1. Introduction

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by Stanmore Consortium ('the Consortium') to prepare a Green Belt Position Note, appraising the Green Belt function of Land situated at Stanmore Village, Bridgnorth, Shropshire ('the site') to inform site promotion and allocation within the Local Plan Review.
- 1.2 This Position Note has been informed by a desk-based review of available data, policy, landscape character publications and mapping. A site visit was undertaken by an experienced Chartered Landscape Architect in May 2019. The site visit was undertaken in 'springtime' in clear and dry weather conditions, allowing for an appreciation of its potential visibility.
- 1.3 The Consortium is promoting Land at Stanmore Village, Bridgnorth to be allocated in the review of the Local Plan. The site is situated close to the settlement of Bridgnorth. The majority of the site is currently managed as arable land, bisected by the A454 and connected by minor roads.
- 1.4 The majority of the site is located within the West Midlands Green Belt (GB); however, Stanmore Business Park is 'inset' in the Green Belt; it is not within the Green Belt, but has an inset boundary drawn around it to exclude it. As such, not all the site is within the Green Belt.
- 1.5 This review has been informed by the baseline findings of a Landscape and Visual Appraisal (report ref. **edp5653_r002**) of the site and should be referred to for supporting plans and review of landscape character.

2. Site Location and Description

- 2.1 The Site comprises three separate parcels of land (west, central and east) as shown on **Appendix EDP 3** and is located approximately 940m east of Bridgnorth town centre. It is within the Local Planning Authority of Shropshire Council. The Site as a whole is centred approximately at Ordnance Survey Grid Reference SO 744 929. The site is situated within the administrative boundary of Shropshire County Council (SCC).
- 2.2 The western parcel comprises predominantly arable farmland with a woodland belt (Hermitage Hill Coppice) running north to south adjacent to the western boundary. The central parcel comprises an area of scrub, scattered trees and grassland. The eastern parcel



is located to the north-east of Stanmore Industrial Park and comprises of woodland, amenity grassland and hard standing.

2.3 A wider site (hereafter referred to as the ‘previous site boundary’), encompassing the three land parcels described above in addition to land to the west of Hermitage Hill Coppice and Stanmore Country Park (which lies to the south of the central and western parcels) was initially proposed by the Client for allocation (this is shown by the blue line on **Appendix EDP 3**).

2.4 A review of the Green Belt assessment for the previous site boundary has been used to inform this current report written for the three parcels within the previous site boundary. The three parcels will be hereafter referred to as the site. This report relates solely to the revised site area which is depicted by the redline on **Appendix EDP 3**. This plan also illustrates the coverage of the current West Midlands Green Belt which extends to the eastern edge of Bridgnorth.

3. The Purpose of This Position Note

3.1 The purpose of this Position Note is to appraise the extent to which the site performs in terms of the five purposes of the Green Belt, as stated in paragraph 134 of the revised National Planning Policy Framework (NPPF)2019.

3.2 Subsequently, this Position Note provides technical evidence to the Local Planning Authority (LPA) (SCC) that the removal of the site from the Green Belt and its development would be appropriate. The following matters are considered in this Position Note:

- An appraisal of the site’s contribution to the function of the Green Belt; and
- Consideration of compensatory provision, as set out in NPPF 2019, paragraph 138.

4. Background to the Green Belt Designation

4.1 The West Midlands Metropolitan Green Belt was conceived to control urban form, and the purposes of a Green Belt around urban areas were set out in 1955 by the Ministry of Housing and Local Government as being:

- To check the further growth of a large built up area;
- To prevent neighbouring towns from merging into one another; and
- To preserve the special character of a town.



- 4.2 The West Midlands Metropolitan Green Belt is a statutory Green Belt environmental and planning policy that regulates the rural space within the West Midlands region of England. The land area taken up by the belt is 224,954 hectares (ha), which is 0.5% of the total land area of England (as calculated in 2010). The vast coverage of the belt completely envelops the county.
- 4.3 The Government formerly set out its policies and principles towards Green Belts in England and Wales in Planning Policy Guidance Note 2: Green Belts, but this planning guidance was superseded by the NPPF in March 2012, and has been subsequently superseded with the revised NPPF (July 2018), and most recently by the Revised NPPF 2019.
- 4.4 There is now more detailed guidance in the National Planning Policy Guidance (NPPG) introduced on 22 July 2019, that deals with ‘compensatory provision’, introduced in the NPPF in July 2018 and remains in the NPPF 2019, in paragraph 138. Paragraph 138 states: *“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”* Planning Authorities are strongly urged to follow the Revised NPPF’s detailed advice when considering whether to permit additional development in the Green Belt.
- 4.5 ‘Openness’ and ‘permanence’ are essential characteristics of the Green Belt and they contribute to the fundamental aim of the Green Belt policy, to prevent urban sprawl by keeping land permanently open. The NPPF requires land to demonstrate that it meets one or more of five ‘tests’ of Green Belt designation, which are set out at Revised NPPF 2019, paragraph 134 as follows:
1. *“To check the unrestricted sprawl of large built-up areas;*
 2. *To prevent neighbouring towns merging into one another;*
 3. *To assist in safeguarding the countryside from encroachment;*
 4. *To preserve the setting and special character of historic towns; and*
 5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 4.6 The Revised NPPF, paragraph 136 (2019) says that: *“... once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”*



- 4.7 Provisionally, this Position Note considers the extent to which the site fulfils the aforementioned five Green Belt purposes, in Revised NPPF (2019). In doing so, EDP have been minded to ensure that any revision to the Green Belt provision would ensure that the LPA (SCC) would: *“satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period”*, as well as, ensuring any new boundaries are: *“defined clearly, using physical features that are readily recognisable and likely to be permanent”* (Revised NPPF, 2019, paragraph 139).

5. Current Green Belt Assessment Undertaken by the Local Planning Authority

- 5.1 At the time of writing this Position Note, the LPA (SCC) have commissioned Land Use Consultants (LUC) to undertake a Green Belt Assessment of Green Belt Land within its administrative area. The Green Belt Assessment is entitled: *‘Shropshire Green Belt Assessment (2017)’* and was published in September 2017. The methodology was prepared by an independent specialist LUC) on behalf of SCC.

- 5.2 The Shropshire Green Belt Assessment (SGBA) does not provide an overall judgement on the suitability of potential of Land in the Green Belt for development; however, following this assessment, Shropshire commissioned LUC to prepare the *‘Shropshire Green Belt Review: Stage 2 (2018)’*. The Stage 2 Green Belt Study draws on the findings of the Stage 1 Assessment and the contribution of parcels to the GB purposes but, also considers the harm of removing parcels and opportunity areas from the GB, taking into account the impact on the integrity of the remaining GB Land and the strength of the remaining Green Belt boundaries.

- 5.3 As confirmed at paragraph 1.10 of the aforementioned SGBA this Green Belt Assessment is intended to inform the review of the Local Plan:

“There is an important difference between a Green Belt Assessment which is to assess the relative performance of the Green Belt, and a Green Belt Review which considers what adjustments could be made to the Green Belt.”

- 5.4 With the presence of a Green Belt Assessment methodology, EDP advocates, the appraisal of the site in line with the methodology adopted by SCC.

- 5.5 In Chapter 2, paragraph 2.34 of the SGBA (2017), identifies the following main purposes of the Green Belt relative to this Principal Centre (which accords to paragraph 134 of the Revised NPPF (Feb 2019)):

1. *“To check the unrestricted sprawl of large built-up areas;*
2. *To prevent neighbouring towns merging into one another;*
3. *To assist in safeguarding the countryside from encroachment;*



4. *To preserve the setting and special character of historic towns; and*
5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

5.6 Chapter 3 of the SGBA (2017), details the review methodology, see **Appendix EDP 4** for an extract. SCC states the following:

“To provide an assessment output that usefully identifies different levels of contribution to Green Belt purposes, it is desirable to define relatively small assessment parcels adjacent to the interface between Green Belt and defined settlements, safeguarded land and other significant sites and key locations.”

5.7 The SGBA identifies a total of 85 discrete land parcels in the study area, including six broad areas. Land parcels are distinct from adjacent land because, they contain land of the same or very similar land use or character and are bounded by recognisable features. Two types of land parcel are identified:

- *“Areas adjacent to built-up areas; and*
- *Broad areas of Green Belt that may be more remote from large built up areas and main settlements.”*

5.8 Chapter 3 of the SGBA (2017), details the set of assessment criteria that was applied for each Green Belt purpose with a description of the rationale for the assessment criteria and ratings, see **Appendix EDP 4** for the relevant tables. The study acknowledges that Purpose 5 should be afforded equal weight with Purposes 1 - 4, but it is not possible to assess the performance of Purpose 5 through parcel-to-parcel assessment. With regards to the site, it does not contain brownfield land and therefore is assumed to make no contribution to Purpose 5. There is very limited brownfield land in Bridgnorth (due to its individual character, heritage and the manner in which the settlement has evolved, as well as a tightly defined settlement boundary therefore, there is unlikely to be any site of equivalent size which would have a contribution to Purpose 5.

“For Green Belt Purposes 1 - 4, the tables set out:

- a) *The NPPF Green Belt Purpose;*
- b) *The key issue(s) considered;*
- c) *The assessment criteria used;*
- d) *The ratings that were applied to each criterion.”*



5.9 The ratings that were applied to each criterion are presented graphically in the tables in **Appendix EDP 4** (using four shades of green/yellow):

Table EDP 5.1: Parcel Ratings

Strong	Parcel performs strong against this Purpose
Moderate	Parcel performs moderately well
Weak	Parcel performs poorly
No Contribution	Parcel makes no contribution

5.10 The site falls into four land parcels (i.e. areas adjacent to built-up areas):

- P54 – the site occupies the western extent of this land parcel between A454 and the western edge of the Hobbins residential development;
- P56 – the western parcel of the site falls within this parcel and forms the majority of the site quantum;
- P57 – the centre parcel of the site falls within this parcel (now referenced within the Local Plan as Site STC002); and
- P58a protected employment – the remaining part of the site occupies the land within the south-western extent.

5.11 The SGBA (2017) finds that the site (i.e. land parcels 54, 56, 57 and 58a) do not perform strongly against Green Belt Purposes 1a, 1b, 2 and 4. It is only when tested against Purpose 3 that two parcels within the site are deemed to perform strongly in Green Belt terms. Arguably, to achieve a strong performance, a high score across all the criteria would be required.

Image EDP 5.1: Extract from SGBA (2017, page 117) Illustrating the Parcels Assessed

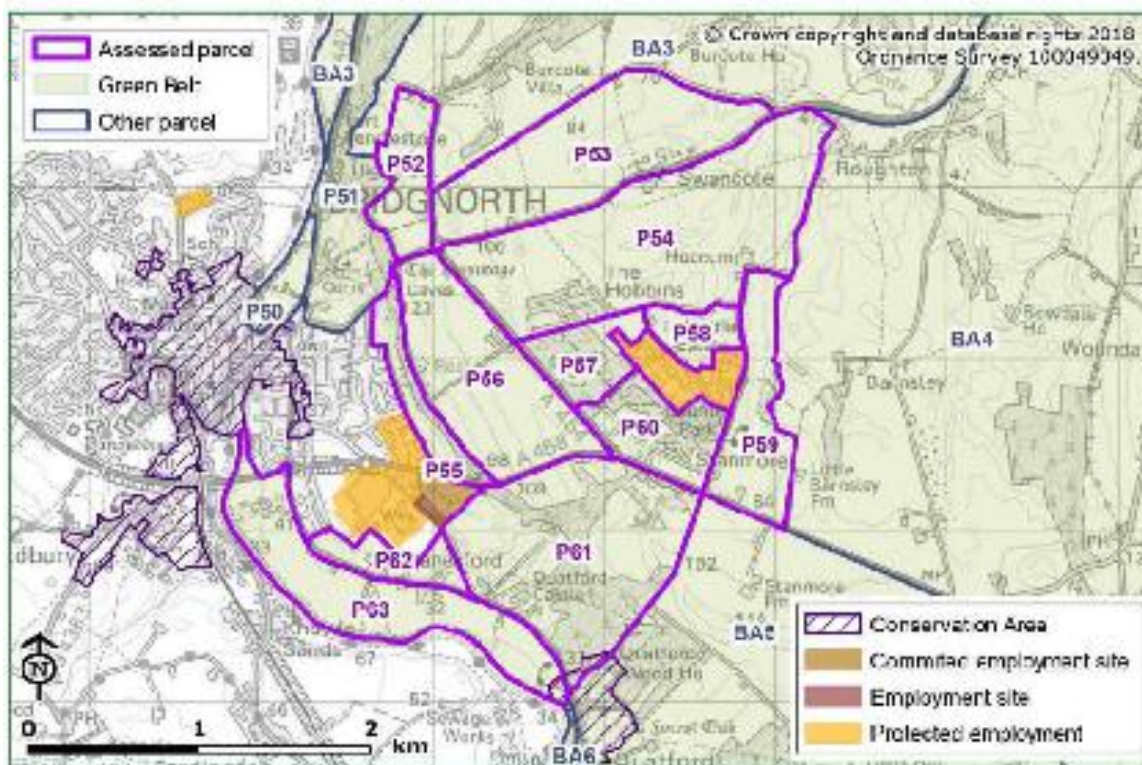


Figure A3.2: Green Belt Parcels Surrounding Bridgnorth

Table EDP 5.2: Extract from Assessment Ratings for Parcels in Green Belt Area around the Bridgnorth Area

Bridgnorth Area					
Parcel Ref	Purpose 1a To check the unrestricted sprawl of large built-up areas. <i>Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?</i>	Purpose 1b To check the unrestricted sprawl of large built-up areas. <i>Does the parcel protect open land from the potential for urban sprawl to occur?</i>	Purpose 2 To prevent neighbouring towns from merging into one another.	Purpose 3 To assist in safeguarding the countryside from encroachment.	Purpose 4 To preserve the setting and special character of historic towns.
P54	No contribution	No contribution	Weak	Moderate	No Contribution
P56	No contribution	No contribution	Weak	Strong	Weak
P57	No contribution	No contribution	Weak	Strong	No Contribution
P58a	No contribution	No contribution	Weak	Moderate	No Contribution

- 5.12 In assessing Purpose 3 of the Green Belt, LUC has considered the “*significance of existing urbanising influences and sense of openness*”. LUC has tested this using two criteria:
1. “*Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?; and*
 2. “*Has the parcel already been affected by encroachment of urbanised built development?*”
- 5.13 If a parcel contains the characteristics of countryside, has no or very little urbanising development and is open, then it scores highly against this single purpose.
- 5.14 The methodology goes on to define what constitutes ‘urbanising influences’ in the commentary section. However, the methodology does not clearly define the characteristics of the countryside stating only that this is: “*...land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape*”. The assessment does not take into account how each parcel performs against site character and does not assess whether the parcel is fully representative of the locally defined landscape character.
- 5.15 In order to fully and robustly test Purpose 3, it is necessary to take a landscape character led approach. This will determine whether the parcel contains the characteristics of local landscape character and is therefore ‘representative’ of the countryside locally. Therefore, a further analysis of this promotion site is justified to determine how it performs against Purpose 3 of the Green Belt.

6. EDP’s Green Belt Review

- 6.1 As noted above, EDP has undertaken a review of the Council’s own evidence base assessment of performance of Land within the Green Belt that covers the County. It was found that the methodology used for the Council’s evidence base falls short of testing all five purposes and consequently, doesn’t provide sufficient detail to consider overall performance.
- 6.2 Consequently, EDP has undertaken a further, focussed appraisal of the extent to which the site performs against Purpose 3 of the Green Belt, as listed in the NPPF, paragraph 80. It has been undertaken by a Chartered Landscape Architect, and follows a bespoke methodology and assessment criteria prepared by EDP (see **Appendix EDP 1**) designed to examine this purpose in further detail. The key differences between this and the Council’s Green Belt Assessment methodology is to consider, whether or not the site should be removed from the Green Belt, and examination of countryside encroachment using a landscape and visual approach.
- 6.3 The detailed findings are presented in the Green Belt Assessment Table (**Appendix EDP 2**). This assessment does not include consideration of the potential of the site to address all



NPPF paragraphs relating to the Green Belt, this instead forms part of the relevant supporting planning statements.

7. Summary of the Performance of the Parcels in Terms of Purpose 3 of the Green Belt

7.1 The following section summarises the detailed findings of the EDP tests and considers this in light of the findings presented by the SGBA.

Performance of Promotion Site Against EDP Green Belt Tests

7.2 Considering the promotion site and the main functions of the Green Belt in slightly more depth, the findings are given below.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

7.3 As noted previously in this review, there is a difference between the SGBA approach and the EDP approach for this test and the two can't be compared directly. However, the observations made in the SGBA relating to Parcels 54, 56, 57 and 58a and the spatial coverage of development can be examined further to understand what the impact is of the different development types on openness.

7.4 In relation to Parcel 54, several considerations are made with regard to the SGBA:

- The SGBA creates a sub-parcel, within Parcel 54 which covers The Hobbins residential development and a small area of land to the west and thus concludes that this area has a lower level of harm associated with its release from the Green Belt. EDP observes that the presence of The Hobbins, which overlooks the wider Parcel 54 to the north and east, weakens the landscape character and visual amenity of views from the PRoW. Therefore, the reduced site area which comprises only land to the west of the A454 and to the north of the Hobbins is considered to perform poorly;
- The wider parcel is open but displays weak landscape characteristics in the form of hedgerow loss and fragmented hedgerow and it does not have a strong connection to the wider countryside;
- There is some sense of encroachment to the east as a result of the hamlets of Hoccum, The Hobbins and part of the hamlet of Swancote which are located within the parcel; and
- EDP considers parcel P54 performs poorly (weak) against Purpose 3 of the Green Belt.

7.5 In relation to Parcel 56, several considerations are made with regard to the SGBA:



- EDP agrees that the western part of the parcel is more elevated and visually prominent than the surrounding land; however, the presence of established woodland within Stanmore Country Park and Stanmore Industrial Estate provides a degree of visual separation between Parcel 56 and the wider countryside to the south-east. Therefore, there will be less sense of encroachment resulting from Green Belt release in this area;
- The observation that the landscape character of this parcel has been weakened by the visual and sensory presence of the A454 and the impact of intensive agricultural regimes on the existing landscape fabric; and
- EDP considers parcel P56 performs moderately well (moderate) against Purpose 3 of the Green Belt.

7.6 In relation to Parcel 57 and 58a, several considerations are made with regard to the SGBA:

- The SGBA concludes that Parcels 57 and 58a play a strong role in safeguarding the countryside from encroachment. Parcel 58a is already identified as protected for employment land. Parcel 57 does not form part of the wider countryside, whilst the parcel contains some of Stanmore Country Park, it is also enclosed by existing development which limits the harm of its release on the wider Green Belt. The reduced site area which falls within this parcel comprises only a small area of land which is nestled behind the existing woodland, adjacent to the Hobbins and Stanmore Industrial Estate units and adjacent to Parcel 58a. On this basis, EDP considers that Parcel 57 performs moderately well against Purpose 3;
- The parcel comprises Stanmore Country Park. At a Local level, the parcel lies within the Enclosed Lowland Heaths Landscape Character Type (LCT), with the adjacent Wooded River Gorge LCT to the west and the Sandstone Estatelands LCT to the east, as defined by the Shropshire Landscape Character Assessment; and
- This parcel does not form part of the wider area of open countryside, therefore, while the parcel comprises woodland which is characteristic of the Enclosed Lowland Heaths, it is also enclosed by development; the A454, The Hobbin's residential development and Stanmore Industrial Estate. The mature woodland is greatly contained by this urbanising character and therefore is only moderately representative of the key characteristics of the countryside.

8. Summary and Conclusions

8.1 EDP has been commissioned by Stanmore Consortium to prepare a Green Belt Position Note that examines the performance of the site against the purposes of the West Midlands Green Belt, as illustrated on **Appendix EDP 2**.

- 8.2 The Council has commissioned several evidence base studies, the most recent being the Shropshire Landscape and Visual Sensitivity Study (LVSS) Assessment (2018) after the Shropshire Green Belt Assessment (2017), which has formed a basis of comparison in this Review. The study concludes that the parcels of land that include the site – Parcels 54, 56, part of 57 (Site Ref STC002) and 58a – make no contribution or a weak performance against Purpose 1, 2 and 4 of the NPPF Green Belt functions, whereas Parcels 56 and 57 make a ‘strong’ contribution to Purpose 3 and Parcels 54 and 58a (which is already protected for employment land) make a ‘moderate’ contribution to Purpose 3 of the NPPF, paragraph 80. The methodology used for the Council’s evidence base falls short of a thorough testing of Purpose 3. Following a review of this evidence base, EDP have concluded that the depth of testing is too limited, and the considerations are not sufficient to examine overall performance against all five purposes.
- 8.3 Consequently, EDP has undertaken a further, focussed appraisal of the extent to which the site performs against the purposes of the Green Belt, as listed in the NPPF, paragraph 134. It has been undertaken by a Chartered Landscape Architect and follows a bespoke methodology and assessment criteria prepared by EDP (see **Appendix EDP 1**) designed to examine the purposes in further detail.
- 8.4 The findings of this review (see **Appendix EDP 1**) conclude that, given the reduced size of the site in reality, the function of the site relative to Green Belt Purpose 3 actually diminishes in certain areas due to the effect of limited representation of key characteristics of the countryside, urbanising features and recreational access to the wider Green Belt. EDP considers that Parcels 56 and 57 make no more than a ‘moderate’ contribution to Green Belt Purpose 3, not a ‘strong’ contribution. The site can readily provide defensible, durable boundaries to the west, south, east and through delivery of Public Open Space and new planting, could reinforce the defensible boundary and buffer to land separating this proposed development from the wider Green Belt to the east. These factors ensure that the site is an isolated parcel of Land with functioning Green Belt buffers.
- 8.5 EDP has reviewed and considered the conclusions of the Shropshire Green Belt Review: Stage 2 (2018) assessment. EDP has concluded that there is an ‘opportunity area’ missing from the study which would consider the promotion site as a ‘whole’. This scenario would combine Parcels 55, 56, the western part of 54, 57 and 58a and is not currently considered in the Stage 2 assessment.
- 8.6 This is relevant to the proposal for a new residential and mixed-use development, as it signifies that, in landscape and visual terms, development can be accommodated in this location without harming the spatial function of the Green Belt or, undermining the individual integrity of other large built up areas that benefit from the buffer provided by the Green Belt.
- 8.7 To conclude, given the foregoing, EDP finds that the ‘overall’ site performs poorly (weak) against all the NPPF’s Green Belt purposes (relative to Green Belt Purpose 1, 2, 4 and 5 with Purpose 3 scoring moderately rather than strongly) and makes a limited contribution to the



fundamental purpose of Green Belt, which is to keep land between settlements permanently open. As such, when coupled with the need to deliver new housing growth at the most sustainable locations in the district it should be considered for release from the Green Belt as part of the Local Plan partial review process.



Appendix EDP 1 Green Belt Review Criteria and Methodology

Review Criteria

- A1.1 As noted in the NPPF, paragraph 80, the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allow for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose is described in more detail below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- A1.2 The site may be an area of open land between two settlements (contiguous), or it may be a continuous buffer to the wider countryside, or it may be an indent into a settlement.
- A1.3 Sprawl may also be discouraged by defensible boundaries to existing settlements that are either natural (e.g. topography, woodland or water course) or man-made features (e.g. as a main road, main railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries may contribute towards greater openness.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- A1.4 This is a test that keeps in check the pattern of settlement growth and whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. The consideration is whether or not the settlement growth could lead to merging with another town.
- A1.5 A site may have already been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the GB is still open and absent of development.
- A1.6 The wording of the NPPF refers to 'towns', but in the context of this assessment study area, the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges as well as distinct settlement areas that might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.



A1.7 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on distance between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

A1.8 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space and access to it, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may however contain man-made features such as historic landmarks, properties, mineral extraction or larger areas of settlement that are washed over by the Green Belt.

A1.9 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the visual context as described above in **Section 2**. Consideration is also given to the extent of recreational access provided to the Green Belt through the site.

A1.10 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.

A1.11 The matter of 'encroachment' is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, sub-stations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.

A1.12 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways whereas natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.



A1.13 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded where possible or integrated sensitively into design proposals.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

A1.14 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

Purpose 5: to Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

A1.15 The consultation exercise considers sites that are greenfield but also whether or not they can be 'recycled' or redeveloped such as brownfield land within the Green Belt.

Methodology

A1.16 EDP has developed a methodology for Green Belt Reviews, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.

A1.17 The site is scored against the criteria for each purpose as shown in **Appendix EDP 2**, with criteria weighted as a Score of 1 (limited), 2 (moderate) or 3 (strong) to reflect the contribution the site makes towards meeting the purposes of the Green Belt. Occasionally, scores are spread if part of the site makes differing performances. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt or retained within it.



NPPF Chapter 13 Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
Purpose 1 To check the unrestricted sprawl of large built-up areas	The boundary shared between a large built-up area and the Green Belt has a role in directing growth. Planned growth is not 'unrestricted'.	What is the geographical relationship between an existing settlement and a site? a. Yes, the site is adjacent to a large built-up area (Score: 3); b. The site is in close proximity to a large built-up area (Score: 2); and c. No, the site is not adjacent to a large built-up area (Score: 1).
	The Green Belt may lie between settlements or between a settlement and the wider countryside.	a. The site forms a contiguous buffer between two distinct settlements (Score: 3); b. The site is surrounded by two or more settlement edges and represents infill (Score: 2); and c. The site forms part of a continuous buffer to countryside (Score: 1).
	Where a site is adjacent to or in close proximity to a built-up area (may or may not be defined as a large built up area), does the boundary prevent sprawl? <ul style="list-style-type: none"> • Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries between settlements and the Green Belt; • Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as 	Does the site have a defensible boundary that can prevent sprawl from the adjacent built-up area? a. The site does not have a defensible boundary and therefore could not keep sprawl in check (Score: 3); b. The site has a defensible boundary/boundaries, which would need additional reinforcement (Score: 2); and c. The site has a defensible boundary/boundaries, which do not require additional reinforcement (Score: 1).



NPPF Chapter 13 Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
	<p>hedgerows, tree belts, streams. Fences do not form defensible boundaries; and</p> <ul style="list-style-type: none"> • Incomplete or low boundaries may result in part/all of a site making a greater contribution to the openness of the Green Belt. 	
Purpose 2 To prevent neighbouring towns merging into one another	<ul style="list-style-type: none"> • Creates a clear, recognisable distinction between urban fringes; and • Ribbon development or isolated pockets of development may be contained. 	<p>a. The site is free of development and associated influences (Score: 3);</p> <p>b. There is an absence of development within the site, but it is overlooked by adjacent/nearby development which may affect openness or open views (Score: 2); and</p> <p>c. No, the site contains some development of one or more types (Score: 1).</p>
	<ul style="list-style-type: none"> • Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap; and • The gaps may contain different elements, be it natural (e.g. topography, woodland, 	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence?</p> <p>a. Immediate and clear intervisibility with next nearest settlement edge (Score: 3);</p> <p>b. Partial intervisibility with next nearest settlement edges (Score: 2); and</p> <p>c. Limited or no intervisibility with next nearest settlement edges (Score: 1).</p>



NPPF Chapter 13 Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
	<p>agricultural land or large open spaces) or man-made features, which prevent merging.</p>	
<p>Purpose 3 To assist in safeguarding the countryside from encroachment</p>	<ul style="list-style-type: none"> The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically. 	<p>To what extent does the site represent the key characteristics of the countryside?</p> <p>a. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics. (Score: 3);</p> <p>b. The site comprises some representative key characteristics but there are few connections with off-site characteristics (Score: 2); and</p> <p>c. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics (Score: 1).</p>
	<ul style="list-style-type: none"> Encroachment: features such as settlement edge, speed signage and street lighting affect the extent to which the countryside changes from rural to urban. 	<p>To what extent is the site urbanised, either by on-site or off-site features?</p> <p>a. There are no urbanising features within the site or directly influencing it (Score: 3);</p> <p>b. There are several off-site urbanising features affecting the site (Score: 2); and</p> <p>c. There are many off-site urbanising features affecting the site, which reduces its representativeness of the countryside (Score: 1).</p>



NPPF Chapter 13 Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
	<ul style="list-style-type: none"> • Recreation: public access to the Green Belt is an indicator of its function; and • What is the experiential quality of the access? 	<ul style="list-style-type: none"> a. There is a strong pattern of rights of way, cycling routes and informal access to the Green Belt (Score: 3); b. There are at least one or more PRow providing access (Score: 2); and c. There are no PRow, cycling or other publicly accessible recreation routes to the Green Belt (Score: 1).
Purpose 4 To preserve the setting and special character of historic towns	<ul style="list-style-type: none"> • In the absence of professional judgement on historic setting and special historic character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to a Conservation Area (CA) which relates to the historic character of a settlement and whether or not its openness is a consideration; and • Where professional judgement is obtained from a heritage consultant, additional considerations are made. 	<p>What is the spatial and visual relationship between the site and the historic core of the nearest towns?</p> <ul style="list-style-type: none"> a. The site is partially or wholly within the historic character area of the town/CA (Score: 3); b. The site shares a boundary with or has clear Intervisibility with the historical character area/CA (Score: 2); and c. The site does not share a boundary with the town/CA and/or there is no intervisibility with its historic core/CA (Score: 1).
Purpose 5 To assist in urban regeneration, by	<ul style="list-style-type: none"> • By association with the Green Belt designation, would assist in urban 	<ul style="list-style-type: none"> a. The site is greenfield in the Green Belt (Score: 3); b. The site is wholly or partially brownfield in the Green Belt (Score: 2); and c. The site is partially not in the Green Belt (Score: 1).



NPPF Chapter 13 Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
encouraging the recycling of derelict and other urban land	regeneration by directing development away from it.	

**Appendix EDP 2
Detailed Analysis**

Application of Criteria			
Purpose 3: To assist in safeguarding the countryside from encroachment			
Parcel Ref	Specific Questions	Assessment	Rating
P54	<i>How representative are the key characteristics of the countryside?</i>	At a local level, the parcel lies within the Enclosed Lowland Heaths Landscape Character Type (LCT), with the adjacent Wooded River Gorge LCT to the west and the Sandstone Estatelands LCT to the east, as defined by the Shropshire Landscape Character Assessment. Following a field survey by EDP, the landscape was found to broadly correlate with the key characteristics of these LCTs in terms of agricultural land. However, the quality and condition of the landscape character has been adversely impacted by the presence of traffic, residential development, raw domestic curtilage and the loss of internal hedgerows structure. There are few key characteristic landscape elements within this parcel.	Weak (Score: 1)
	<i>What is the influence of urbanising features?</i>	Landscape detractors have clearly affected the representation of positive characteristics within the parcel. The result of The Hobbins residential development resulting in a raw urban edge, the containment of the A454 and the loss of internal hedgerows structure has changed the landscape of this parcel considerably. This is reflected in the Shropshire Landscape Visual Sensitivity Study (LVSS) Assessment (2018) this is a landscape of high activity and there is a need to 'reconstruct' the landscape.	Weak (Score: 1)
	<i>Is there recreational access to the wider Green Belt?</i>	There exists a network of PRow within the wider Green Belt. There is one public right of way which crosses the parcel that connects with the wider network.	Moderate (Score: 2)



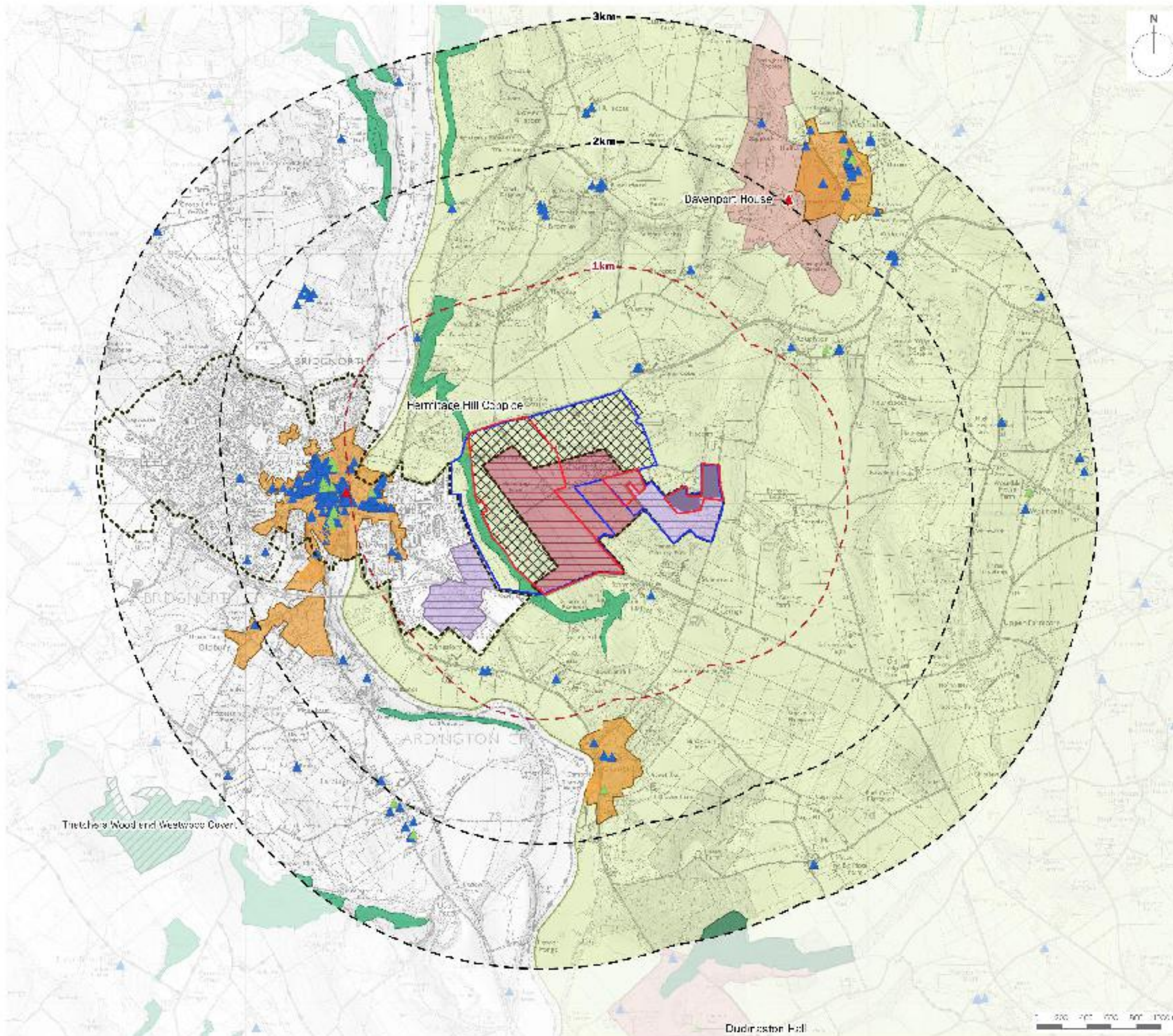
Application of Criteria			
Purpose 3: To assist in safeguarding the countryside from encroachment			
Parcel Ref	Specific Questions	Assessment	Rating
P56	<i>How representative are the key characteristics of the countryside?</i>	At a local level, the parcel lies within the Enclosed Lowland Heaths Landscape Character Type (LCT), with the adjacent Wooded River Gorge LCT to the west and the Sandstone Estatelands LCT to the east, as defined by the Shropshire Landscape Character Assessment. However, at the smaller grain of the site itself there are, inevitably, local characteristics that influence the character itself, and as a result its representation differs from that of the Enclosed Lowland Heaths. The hedgerows have come under pressure from agricultural management so that the condition is comprised. The existing road network surrounds the parcel to the north, east and south, which detracts from the rural tranquillity and exerts an urbanising influence across the site.	Moderate (Score: 2)
	<i>What is the influence of urbanising features?</i>	This parcel is perceived as open agricultural land but is separated from the wider countryside by the existing road network. Key urbanising influences are the A454 and A458 and noise, traffic movement and lighting associated with these routes; overhead cables running alongside A454, HGV traffic entering the Industrial Estate and recreational users entering the Stanmore Country Park. This does not lessen across the site due to continued intervisibility with the road across the whole parcel.	Moderate (Score: 2)
	<i>Is there recreational access to the wider Green Belt?</i>	There exists a network of PRoW within the wider Green Belt. There is one public right of way which crosses the parcel that connects with the wider network.	Moderate (Score: 2)
P57 (and P58a)	<i>How representative are the key characteristics of the countryside?</i>	<p>The parcel comprises Stanmore Country Park. At a local level, the parcel lies within the Enclosed Lowland Heaths Landscape Character Type (LCT), with the adjacent Wooded River Gorge LCT to the west and the Sandstone Estatelands LCT to the east, as defined by the Shropshire Landscape Character Assessment.</p> <p>This parcel does not form part of the wider area of open countryside, therefore while the parcel comprises woodland which is characteristic of the Enclosed Lowland Heaths, it is also enclosed by</p>	Moderate (Score: 2)



Application of Criteria			
Purpose 3: To assist in safeguarding the countryside from encroachment			
Parcel Ref	Specific Questions	Assessment	Rating
		development; the A454, The Hobbin's residential development and Stanmore Industrial Estate. The mature woodland is greatly contained by this urbanising character and therefore is only moderately representative of the key characteristics of the countryside.	
	<i>What is the influence of urbanising features?</i>	Key urbanising influences are the A454 and A458 and noise, traffic movement and lighting associated with these routes; overhead cables running alongside A454, the Stanmore Industrial Estate with associated business units, the machinery and HGV traffic entering the Industrial Estate and recreational users (pedestrians and cyclists) using Stanmore Country Park.	Weak (Score: 1)
	<i>Is there recreational access to the wider Green Belt?</i>	There is public access which crosses the parcel that connects with the wider network.	Moderate (Score: 2)



Appendix EDP 3
Relevant Planning Designations and Considerations
(edp5653_d003c 08 September 2020/RB/VP/GY)



- Site Boundary
- Previous Site Boundary
- Range Rings (at 1 km intervals)
- 1km Data Led Study Area
- Land Use Considerations**
- Birmingham Green Belt
- Ecological Designations**
- Areas of Special Scientific Interest (SSSI)
- Ancient Semi-natural Woodland
- Historical Designations**
- Scheduled Monuments
- Registered Parks and Gardens
- ▲ Listed Building Grade I
- ▲ Listed Building Grade II*
- ▲ Listed Building Grade II
- Conservation Area
- Shropshire Council Preferred Site Consultation Document**
- Development Boundary
- Proposed Safeguarded Land for development beyond 2030
- Proposed Employment Site
- Protected Employment Site
- Mixed Use

client
Stanmore Consortium

project title
Stanmore Village, Bridgnorth

drawing title
Plan CDP 3: Relevant Planning Designations and Considerations

date	08 SEPTEMBER 2020	drawn by	FB
drawing number	edp3053_0200	checked	VP
scale	1:50 (A0 @ 30)	QA	RY



Appendix EDP 4
Extract from Shropshire County Council Green Belt Review
(SCCGBR, 2017)

Appendix 3

Bridgnorth Assessment

Part 1: Settlement Context

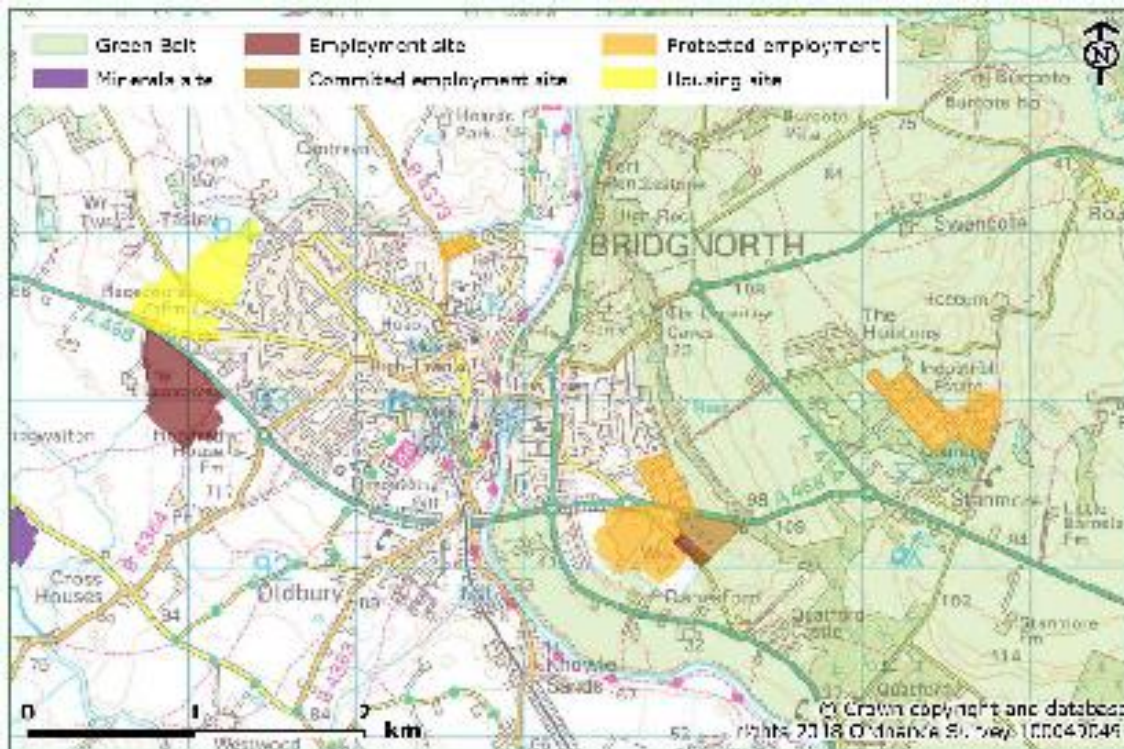


Figure A3.1 Bridgnorth Settlement Context

The town of Bridgnorth is on the western edge of the Shropshire Green Belt. The River Sever divides Bridgnorth, with part of the town, known as High Town, elevated above the River to the west and to the East of the River the area known as Low town. The eastern part of the town is nearly completely enclosed by Green Belt which continues along the eastern side of the River Sever to the North and South of the town.

The population of Bridgnorth is estimated to be around 13,030 persons living in approximately 6,189 dwellings¹. The historical growth of the town from its medieval origins continued through the industrial revolution, with further post war development including Council housing, and expansion with peripheral housing estates during the 1960's and 1970's. There have also been relatively large residential developments in Low Town during the 1990's utilising brownfield sites previously in industrial use and recent estate development to the West of the town in Tasley Parish. All this residential development is contained within constraints of a by-pass built during the 1980s to the south of the town. Bridgnorth itself retains its central medieval street pattern and many old buildings, which together with the topography, have resulted in a unique town with a distinctive character which has a large Conservation Area.

Bridgnorth, as the third largest town in Shropshire, acts as a key service centre not just for the town, but for a sizeable area of eastern Shropshire. Located at the junction of the A458 and the A442, it also accessible to Telford, Shrewsbury, Kidderminster, Wolverhampton and the Black Country. However, in part due to strong environmental constraints such as flood plain and topography there are now limited remaining infill opportunities within the built form, or more broadly within the Bridgnorth by-pass.

¹ Shropshire Council (2017), Hierarchy of Settlements

Shropshire Council has identified Bridgnorth as a proposed 'Principal Centre' settlement within its Preferred Scale and Distribution of Development consultation document (2017), (informed by its Hierarchy of Settlements Assessment²), as it offers significant employment opportunities and provides a range of services and facilities which serve the settlement's resident communities and surrounding rural hinterlands. Principal centres comprise the larger market towns within Shropshire settlements and are considered to present the best opportunities to deliver high levels of growth outside Shrewsbury³.

Shropshire Council's Preferred Scale and Distribution of Development consultation document (2017)⁴, proposes an 'urban focus' for development, with around 24.5% of the total growth in Shropshire in the period to 2036 to occur in the five 'Principal Centres' which include Bridgnorth. As the second largest principal centre in Shropshire, it is expected that Bridgnorth will contribute towards the strategic growth objectives in the east of the County.

The Preferred Scale and Distribution of Development consultation document (2017) proposes that in Bridgnorth around 1,500 homes and a minimum of 16ha of employment land should be delivered in the period up to 2036, including at sites already allocated outside the Green Belt. Taking into account existing planning permissions, allocations and other approvals, there is a need to identify sites for around a further 912 dwellings as well as the employment land required to deliver net floorspace requirements.

The previous consultation identified that, notwithstanding the preferred level of employment growth, the location of Bridgnorth and other strategic objectives may drive a need for additional employment land. This potential was highlighted by the Inspectors Report on the Examination into the SAMDev Plan (2015)⁵ which indicates that 'to accommodate the long-term future of the town, it is necessary to open up new areas'. Green Belt constraints (including the lack of any identified safeguarded land for development) and the role of Green Belt review to consider opportunities to support the balanced and sustainable growth of the town are recognised. Key concerns for Bridgnorth include the need to provide more affordable housing and to achieve a better balance between housing and employment by stimulating additional local employment opportunities. Thus the need and scope for Green Belt release to provide for future development to the east of Bridgnorth will need to be considered as part of Local Plan Review.

Bridgnorth benefits from an existing Town Plan⁶ (endorsed December 2011) which identifies key issues and recommended actions for a range of topic areas.

² Shropshire Council (2017), Hierarchy of Settlements

³ Shropshire Council (2017), Preferred Scale and Distribution of Development consultation document

⁴ Shropshire Council (2017), Preferred Scale and Distribution of Development consultation document

⁵ The Planning Inspectorate (2014), Shropshire Council Site Allocations and Management of Development Local Plan, Inspector's Report

⁶ Bridgnorth Town Plan (2011) Available at: bridgnorthtownplan.com

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

The map and aerial show the location and extent of all the parcels around Bridgnorth that were considered in the Stage 1 Green Belt Assessment (2017) (outlined purple and blue on Figures A3.2 and A3.3). The parcels outlined in purple are those around Bridgnorth that are being considered in further detail as part of the assessment of harm. This assesses the harm to the Green Belt as a consequence of releasing land for development.

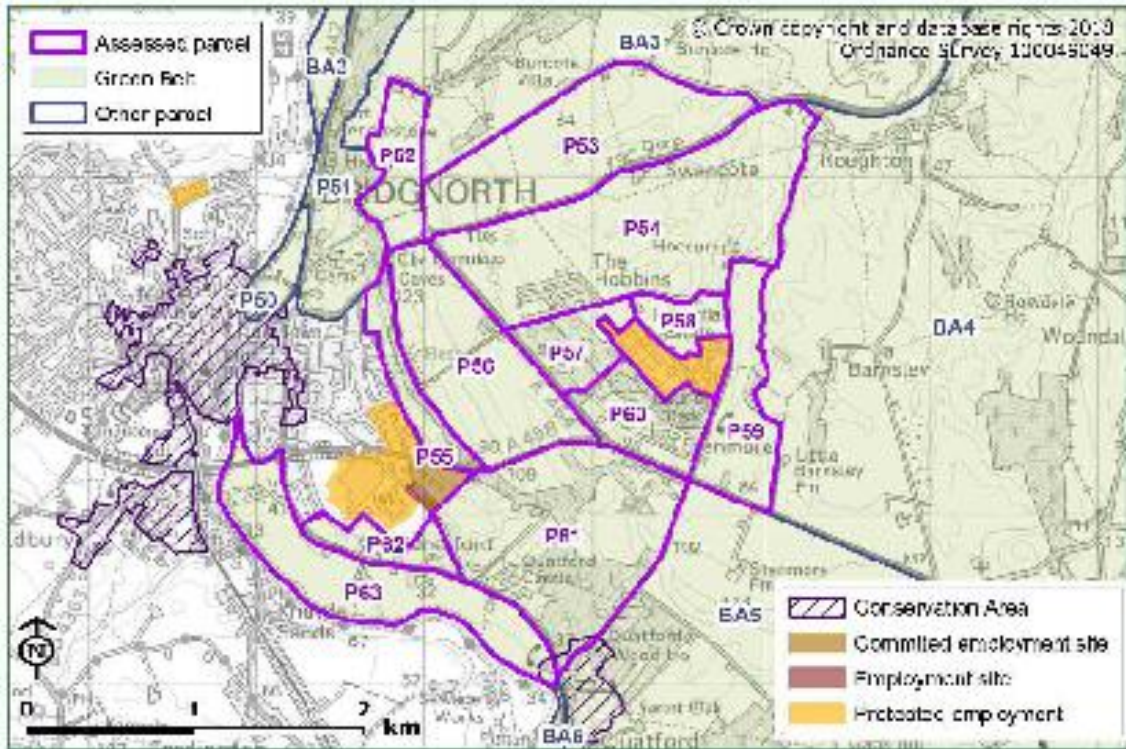


Figure A3.2: Green Belt Parcels Surrounding Bridgnorth

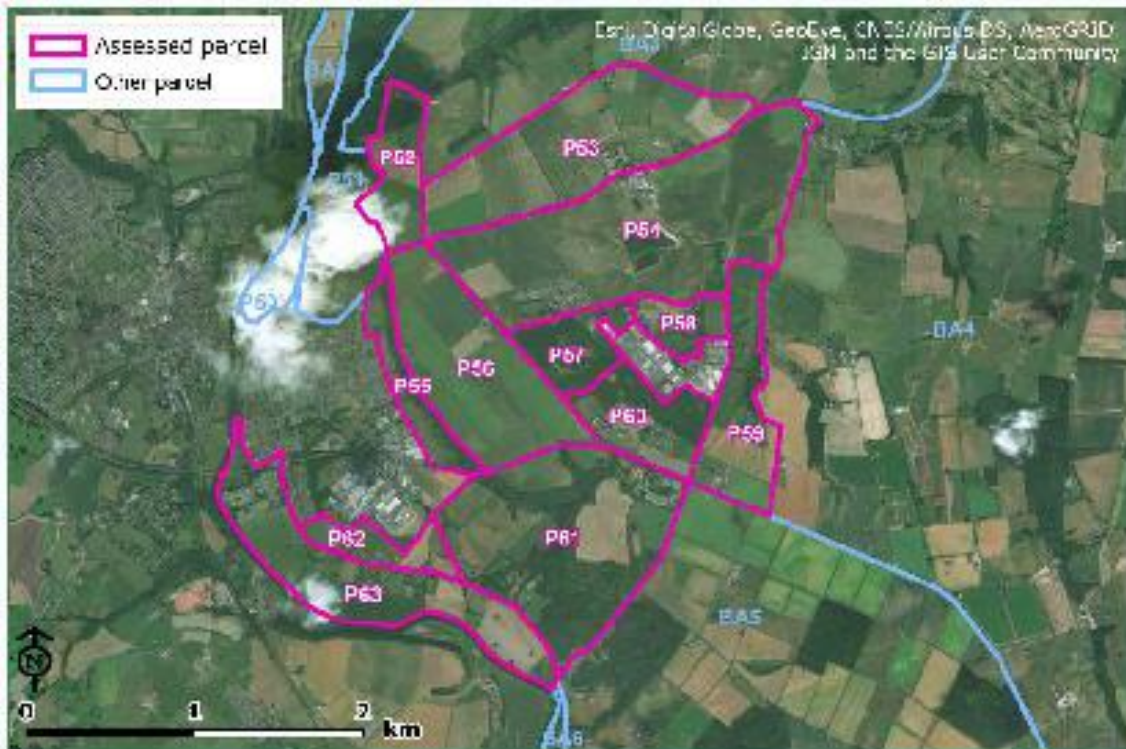


Figure A3.3: Aerial view of Green Belt Parcels Surrounding Bridgnorth

Parcel P52

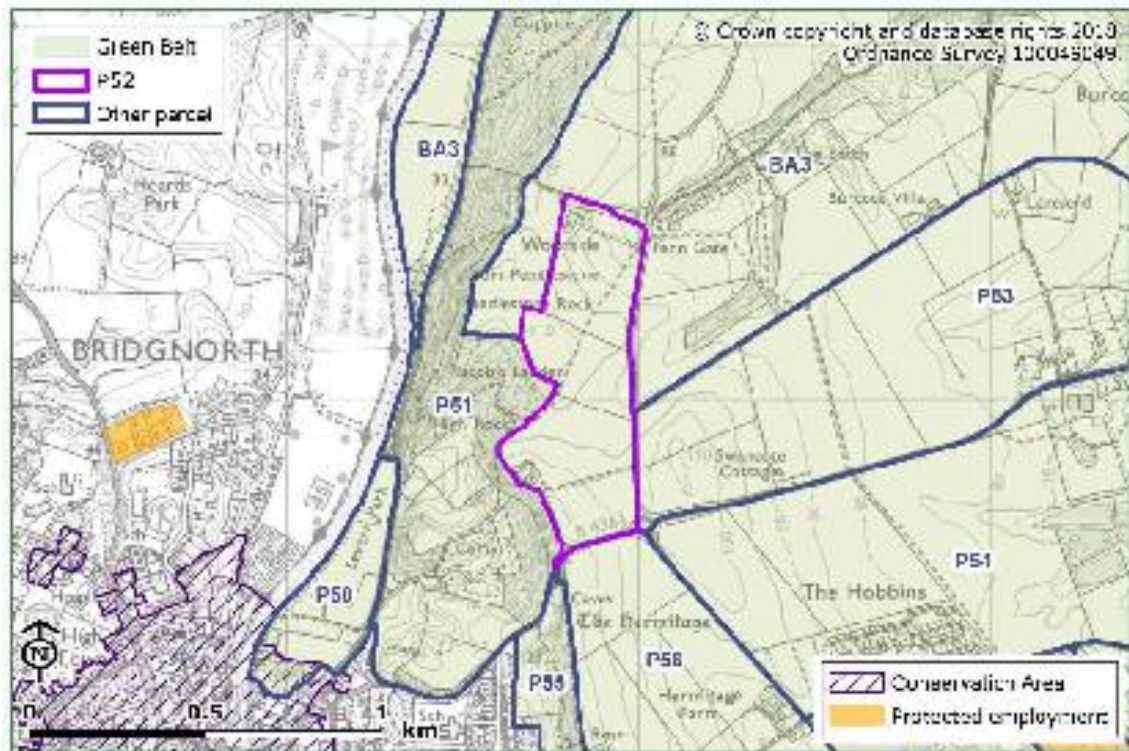


Figure A3.4: Parcel P52



Figure A3.5: Rolling farmland sloping eastwards within parcel P52, the ancient woodland of Hermitage Hill Coppice seen in the background: view west from the eastern boundary of the parcel

Relationship to settlement/countryside

Parcel P52 comprises undulating agricultural land adjacent the east of the 'High Rock/Pendlestone Rock/Jacobs Ladder escarpment' and 'Hermitage Hill Coppice' ancient woodland. These visually and physically separate the parcel from the urban area of Bridgnorth to the west. The parcel is bound to the north by a farm access track, to the east by a rural lane and to the south by the B4363, beyond which lies agricultural land with the parcel forming part of a wide area of open countryside set to the east of Bridgnorth.

The conclusions on the contribution of parcel P52 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below. No sub-parcels within P52 were identified that would have a lower level of harm.

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

No Contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Telford both of which are considered towns with regard to Purpose 2. However, these settlements are over 10km apart from each other. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between the settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is little sense of encroachment due to the area being almost entirely free of development. The only built development includes farm buildings which are not considered to be urbanising influences. Adjacent land uses include fields and woodland. The B4363 / A454 roundabout (with street lights) lies adjacent to the south-east and exerts a slight sense of urban encroachment on the parcel. However the land parcel contains characteristics of countryside and is open. The Green Belt parcel is playing a strong role preventing encroachment of the countryside.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, this parcel is screened by from view by the distinctive wooded ridge of Jacob's Ladder and Pendlestone Rock, located within an adjacent parcel. The openness of the land does not play an important role in the immediate setting of this historic settlement, but does contribute to preserving the wider rural setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The southern section of the western boundary of the parcel is defined by a band of ancient woodland which is a strong and readily recognisable boundary. The southern boundary is defined by the B4365 and the eastern and northern boundaries are defined by a farm access track and rural lane. These alternative Green Belt boundaries are readily recognisable and clearly defined physical features but are not strong boundaries. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land), any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary. The release of P52 in isolation from the release of P50 and P51 would not create a coherent Green Belt boundary.

Harm to Green Belt Resulting from Release

This parcel is open, comprising agricultural landcover. The only development present within the parcel are farm buildings which accord with the NPPF's appropriate uses of Green Belt land. Releasing this parcel from the Green Belt would lead to a significant level of encroachment on the countryside and weaken the contribution of neighbouring areas with regard to Purpose 3. It is considered that the release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

Parcel P53

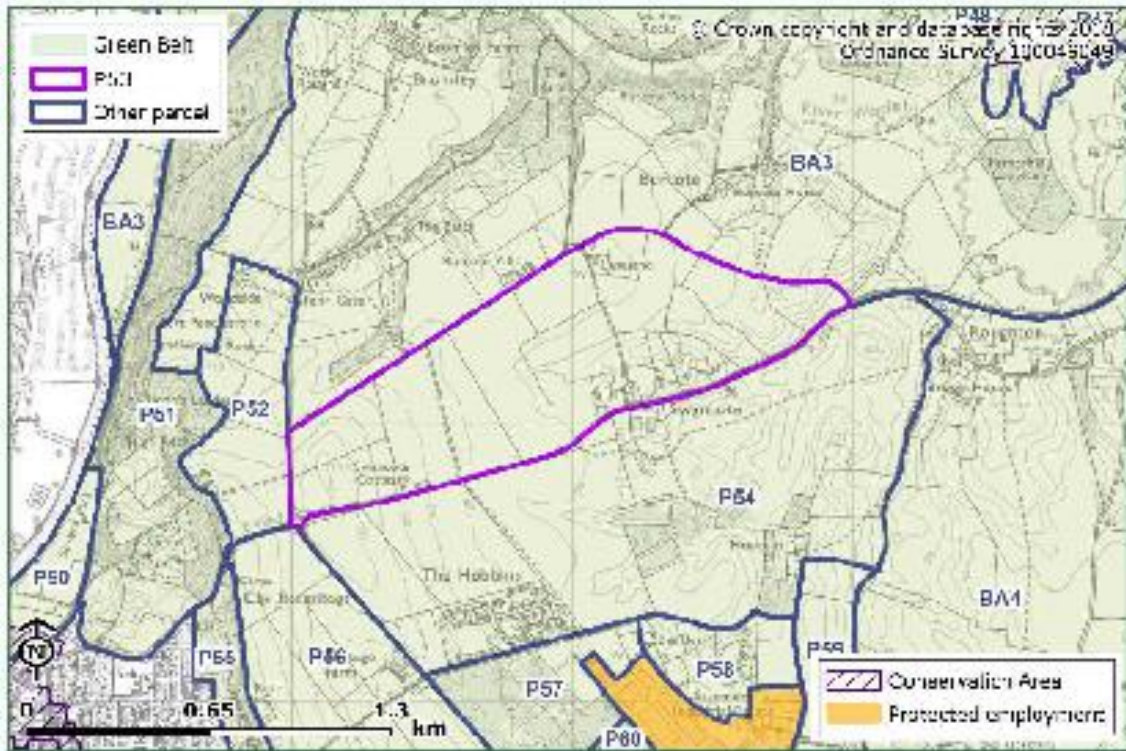


Figure A3.6: Parcel P53



Figure A3.7: Open farmland within parcel P53, view east from public footpath off the A454

Relationship to settlement/countryside

Parcel P53 comprises undulating and gently sloping agricultural land to the east of the 'High Rock /Jacobs Ladder escarpment' and 'Hermitage Hill Coppice' ancient woodland. These, along with parcel P52, visually and physically separate the parcel from the urban areas of Bridgnorth to the west. The parcel is bound to the south by the A454 and to the north, east and west by country lanes. The parcel contains a limited amount of built development, including the Swancote Health and Leisure Centre, however this has little urbanising influence and the parcel remains predominately open and forms part of the wider countryside to the east of Bridgnorth.

The conclusions on the contribution of parcel P53 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below. No sub-parcels within P53 were identified that would have a lower level of harm.

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

No Contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is a limited sense of encroachment within the parcel as a result of the Swancote Health and Leisure Centre located along the southern boundary. Additionally, the B4363 / A454 roundabout (with street lights) is located in the southwest of the parcel and exerts a limited sense of urban encroachment. However the land parcel remains open, contains strong characteristics of countryside and is rural in character. It is considered to be playing a strong role in safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The southern boundary of the parcel is defined by the A454 and the northern, eastern and western boundaries of the parcel are defined by country lanes. These are readily recognisable and clearly defined physical features. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land) any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary in association with any neighbouring areas of land proposed for release.

Harm to Green Belt Resulting from Release

This parcel is open and predominantly comprises agricultural landcover. The only built development present within the parcel includes a small number of detached houses and the relatively small Swancote Health and Leisure Centre. Releasing this parcel from the Green Belt would lead to a significant level of encroachment on the countryside and would weaken the role neighbouring areas contribute to Purpose 3. It is considered that the release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

Parcel P54

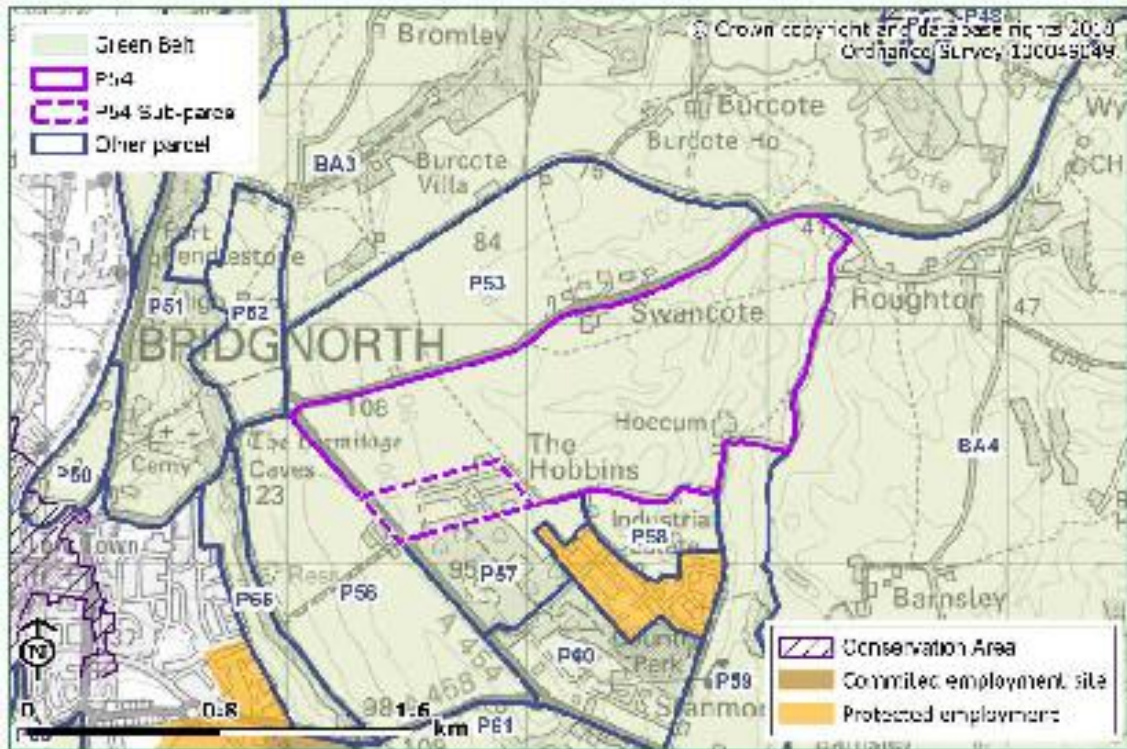


Figure A3.8: Parcel P54



Figure A3.9: Small field to the west of The Hobbins forming sub-parcel P54, view southwest from the north-western edge of The Hobbins.

Relationship to settlement/countryside

Parcel P54 comprises undulating agricultural land to the east of Bridgnorth. Intervening rising land and the 'Hermitage Hill Coppice' ancient woodland, located to the west of the parcel, visually and physically separate it from the urban areas of Bridgnorth. The parcel is bound to the north and west by the A454 and to the south and east by country lanes. A block of residential properties (The Hobbins) is located in the southwest of the parcel and woodland within Stanmore Country Park and Stanmore Industrial Estate are located in neighbouring land to the southwest of the parcel, whilst these are an urbanising influence they provide a degree of separation between the parcel and the wider countryside to the south. The southwest corner of the parcel is enclosed by The Hobbins and woodland within Stanmore Country Park and does not have a strong relationship with wider countryside that surrounds.

The conclusions about the performance of Parcel P54 are set out in the descriptions below. This includes the identification of a sub-parcel within Parcel P54 (delineated on Figure A3.8 in a purple hatch line) which the assessment concludes would have a lower level of harm associated with its release.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Albrighton both of which are considered towns with regard to Purpose 2. However, these settlements are over 13km apart from each other. The parcel also lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between the settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as a result of the hamlets of Hoccum, The Hobbins and part of the hamlet of Swancote which are located within the parcel. However the parcel displays the characteristics of the countryside and is open. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

The south-western corner of this parcel comprises a block of residential properties (The Hobbins) and a small pastoral field that lies adjacent to the west (contained on three sides by settlement, woodland and a road which provide a degree of separation between it and the wider parcel). This area (including the Hobbins) is considered to be playing a weaker role against Purpose 3.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The A454 defines the northern and western edges and rural lanes define the southern and western edges of the parcel. These features would form readily recognisable alternative Green Belt boundaries, but are not particularly strong. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land) any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary in association with any neighbouring areas of land proposed for release.

Harm to Green Belt Resulting from Release

Although this parcel contains a block of residential development, it is open, predominantly comprises agricultural land, and is strongly associated with the wider countryside to the east of Bridgnorth. Releasing this large parcel from the Green Belt would lead to a significant level of encroachment on the countryside and a weakening of the contribution of neighbouring land to Purpose 3. It is considered that the release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

A sub-parcel has been identified within Parcel P54 that would lead to a lower level of overall harm to the Green Belt if it was to be released. Sub-parcel P54 comprises a block of residential development (The Hobbins) and a small field to the west. This sub-parcel does not have a strong connection to the wider countryside. Releasing this sub-parcel from the Green Belt would have a limited sense of encroachment on the countryside and would not affect the integrity of neighbouring Green Belt land. It is considered that the release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P55

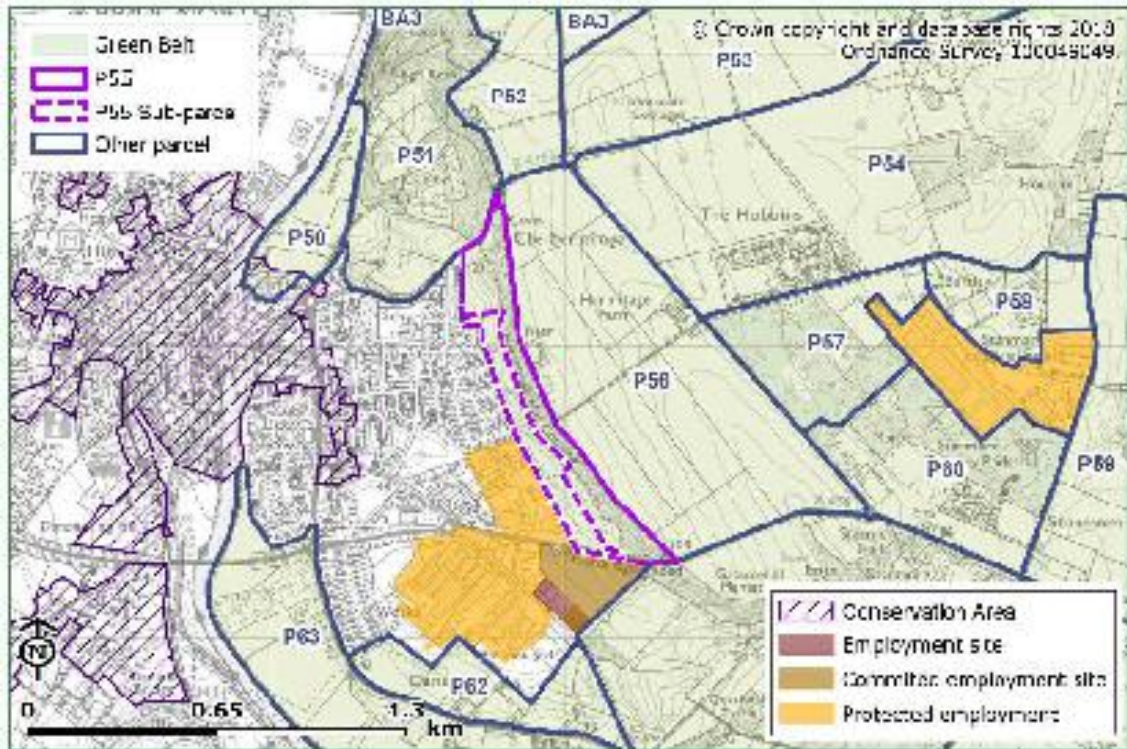


Figure A3.10: Parcel P55



Figure A3.11: Steep western sloping farmland within sub-parcel P55, view southwest from the edge of Hermitage Hill Coppice.

Relationship to settlement/countryside

The western and southern edge of the parcel adjoins the urban edge of Bridgnorth. The northern edge is bound by the B4363 with woodland beyond. The eastern side of the parcel comprises the ancient woodland of 'Hermitage Hill Coppice' which provides a strong degree of separation between the west of the parcel and the wider countryside to the east. The western side of the parcel is more closely associated with the urban area of Bridgnorth than the countryside.

The conclusions about the performance of Parcel P56 are set out in the descriptions below. This includes the identification of a sub-parcel within Parcel P56 (delineated on Figure A3.10 in a purple hatch line) which the assessment concludes would have a lower level of harm associated with its release.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Albrighton both of which are considered towns with regard to Purpose 2. However, these settlements are over 13km apart from each other and the parcel makes no contribution to preventing the merging or erosion of the visual or physical gap between them. The parcel also lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

It is also acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate/The Hobbins. Stanmore Industrial Estate/The Hobbins is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Weak

There is a strong sense of encroachment within this parcel as a result of the settlement edge of Bridgnorth, which includes large industrial buildings. The parcel comprises small pastoral fields and mature woodland, and contains no urban development. It displays some of the characteristics of the countryside, but is on the urban fringe and lacks a strong rural character. The Green Belt plays a weak role safeguarding the countryside from encroachment.

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

Strong

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, the distinctive wooded ridgeline of Hermitage Hill Coppice, located within the parcel, has excellent visibility with large areas of this historic settlement. The openness of the land plays a key role in the immediate setting of Bridgnorth and is considered to contribute positively to its historic significance and special character.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The existing settlement edge on the western boundary of the parcel does not constitute a strong Green Belt boundary. A new Green Belt boundary to the west of 'Hermitage Hill Coppice' designated ancient woodland would represent a stronger and alternative Green Belt boundary.

Harm to Green Belt Resulting from Release

This parcel is undeveloped, however the settlement edge of Bridgnorth exerts a sense of urban encroachment across the western part of the parcel. The ancient woodland band on the elevated ridge within the eastern part of the parcel plays a key role in separating the west from the wider countryside to the east. The release of the eastern part of the parcel would lead to encroachment on the countryside to the east and a weakening of the neighbouring area of Green Belt land. Additionally, this distinctive wooded ridgeline plays an important role in the immediate setting of the historic area of Bridgnorth. Releasing the whole of Parcel P55 would significantly compromise the role this Green Belt land is playing with regard to Purpose 4. The release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

A sub-parcel has been identified within Parcel P55 that would lead to a lower level of overall harm to the Green Belt if it was released. Sub-parcel P55 comprises the western part of the parcel, which includes sloping pastoral fields that rise to the east towards the woodland. The settlement edge of Bridgnorth exerts a strong sense of encroachment within the sub-parcel. The openness of the land within the sub-parcel does not play a key role in the setting of the historic settlement area located within Bridgnorth, as it is largely out of sight. Releasing Sub-parcel P55 would not significantly compromise the role this Green Belt land is playing with regard to Purpose 4 and, due to the presence of the wooded ridgeline to the east, would not lead to a sense of encroachment on neighbouring areas of open Green Belt land. Releasing Sub-parcel P55 from the Green Belt would lead to a **Low-Moderate** level of harm to the Green Belt in this local area.

Parcel P56

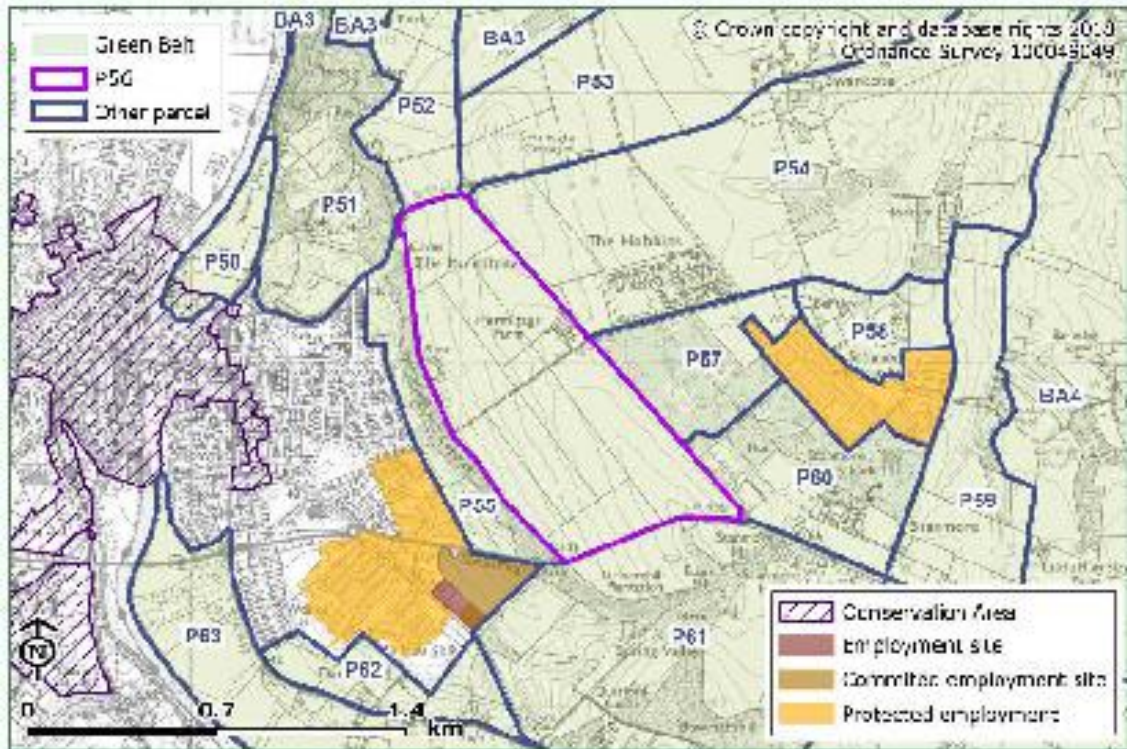


Figure A3.12: Parcel P56



Figure A3.13: Open farmland within Parcel P56 sloping down to east, view northeast from a public footpath along western edge of the parcel.

Relationship to settlement/countryside

Parcel P56 comprises sloping agricultural land located to the east of Bridgnorth. 'Hermitage Hill Coppice' ancient woodland is located along the western boundary of the parcel and visually and physically separates it from the urban area of Bridgnorth. The parcel is open and contains no built development apart from Hermitage Farm which is an 'appropriate use' of land within the Green Belt. The parcel is bounded to the north and northeast by the B4363 and A454 respectively which provide little separation between the parcel and the neighbouring areas of agricultural land. Woodland within Stanmore Country Park and the Stanmore Industrial Estate are located in neighbouring land to the southeast of the parcel and provide a degree of separation from the wider countryside to the east. However, despite this separation, the parcel forms part of a wide area of open countryside set to the east of Bridgnorth.

The conclusions about the performance of Parcel P36 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Albrighton both of which are considered towns with regard to Purpose 2. However, these settlements are over 13km apart from each other and the parcel makes very little contribution to preventing the merging or erosion of physical gap between them. The parcel also lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

It is also acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate/The Hobbins. Stanmore Industrial Estate /The Hobbins is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is little sense of encroachment due to the area being almost entirely free of development. The only built development includes farm buildings which are not considered to be urbanising influences. The B4363 / A454 roundabout (with street lights) lies adjacent to the north-east and exerts a slight sense of urban encroachment on the parcel. However, the land parcel contains strong characteristics of countryside, has no urbanising development, and is open. The Green Belt parcel is playing a strong role preventing encroachment of the countryside.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, this parcel is screened by from view by the distinctive wooded ridgeline of Hermitage Hill Coppice, located within the adjacent parcel. The openness of the land does not play an important role in the immediate setting of this historic settlement, but contributes to preserving the wider rural setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The ancient woodland band along the western edge of the parcel would form a strong and durable boundary feature. Roads along the northern, southern and eastern edges of the parcel would form readily recognisable and clearly defined Green Belt boundaries but would not constitute strong boundary features. There are no stronger alternative boundary features. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land), any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary in association with any neighbouring areas of land proposed for release.

Harm to Green Belt Resulting from Release

Parcel P56 is open in character and undeveloped, comprising agricultural landcover. Releasing this parcel from the Green Belt would lead to encroachment on the countryside and a weakening of the neighbouring areas of Green Belt land with regard to Purpose 3. The parcel is partially contained to the west and southeast by the Stanmore Industrial Estate and Stanmore Country Park which would reduce the sense of encroachment on the wider countryside and level of harm to the Green Belt. Nevertheless, due to the open and sloping landform within the parcel, releasing this parcel from the Green Belt would lead to a **Moderate-High** level of harm to the Green Belt in this local area.

Parcel P57

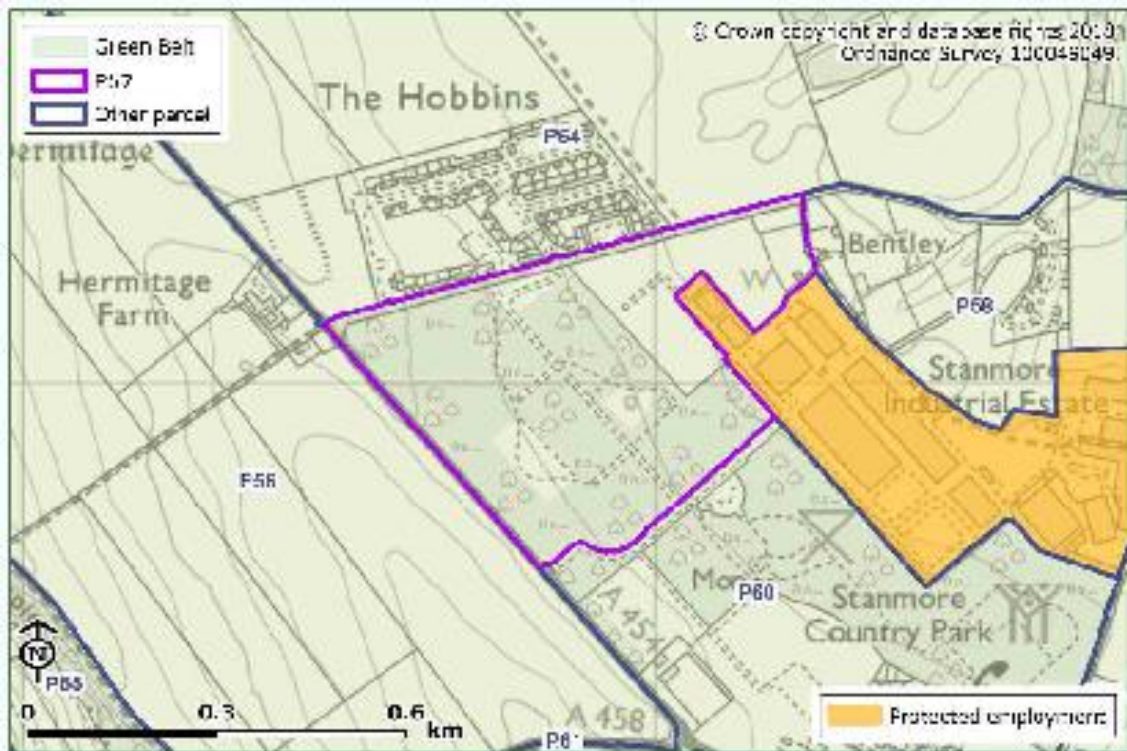


Figure A3.14: Parcel P57



Figure A3.15: Woodland within Stanmore Country Park in parcel P57, view east from the western edge of parcel P56

Relationship to settlement/countryside

Parcel P57 is located adjacent to the northwest of Stanmore Industrial Estate and is bound to the southwest by the A454 and the north and south by minor roads. In addition, a block of residential properties (The Hobbins) are located adjacent to the north of the parcel, and woodland within Stanmore Country Park adjoins the southeast of the parcel. These features provide a degree of containment of the parcel from the surrounding wider countryside. However due to the presence of woodland there is a limited sense of urban encroachment within the parcel.

The conclusions about the performance of Parcel P57 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 750m east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between the settlements. Loss of openness would not be perceived as reducing the gap between these settlements.

It is also acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate. Stanmore Industrial Estate is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

The parcel comprises Stanmore Country Park. There is very little sense of encroachment despite being bordered to the north by the hamlet of The Hobbins and to the east by Stanmore Industrial Estate due to the woodland within the parcel which limits visibility. The parcel itself is entirely free of development, however the A454 runs along the western boundary. The Green Belt plays a strong role safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads surrounding the parcel would form a more consistent and readily recognisable alternative Green Belt boundary than the existing urban edge of Stanmore Industrial Estate which is inset in the Green Belt.

Harm to Green Belt Resulting from Release

Parcel P57 contains no built development and is open in character with an abundance of woodland. The parcel is contained by development to the north (the Hobbins) and the east (Stanmore Industrial Estate). Its containment by development provides separation from the wider countryside to the north and east. Releasing this parcel from the Green Belt would lead to encroachment on the countryside within the parcel itself, but its relative containment by existing development would minimise harm to the wider Green Belt. The roads surrounding the parcel would also form a more consistent and readily recognisable alternative Green Belt boundary than the existing urban edge of Stanmore Industrial Estate. The release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P58

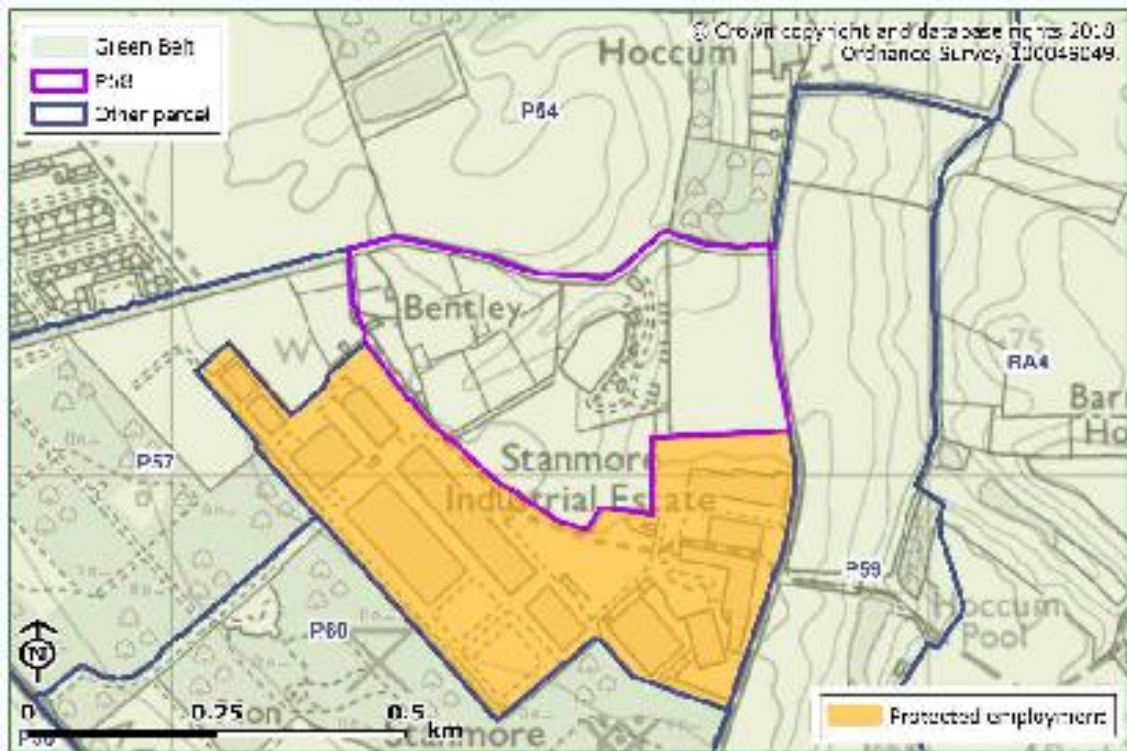


Figure A3.16: Parcel P58



Figure A3.17: Horse paddocks within parcel P58, view southeast from northern edge of the parcel, with Stanmore Industrial Estate in the background.

Relationship to settlement/countryside

Parcel P58 is located adjacent to the north of Stanmore Industrial Estate, which is located to the south of the parcel. This area encompassing Stanmore Industrial Estate is largely developed with modern industrial buildings and associated service areas and is inset within the Green Belt. The northern and north-eastern edges of the parcel are bound by country lanes, and a block of woodland adjoins the northeast of the parcel. The east of the parcel is bound by hedgerows and a plantation of young deciduous trees. These features provide minimal separation between the parcel and the wider countryside to the north and east. Although partly contained by development, the parcel is open and forms part of the wider countryside.

The conclusions about the performance of Parcel P58 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 1.5km east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as it is bordered to the south and southwest by the Stanmore Industrial Estate. Additionally, a cluster of houses are located to the northwest of the parcel, including a large single dwelling with swimming pool and tennis court. The land parcel contains agricultural fields, paddocks and lines of trees; it has characteristics of countryside and is generally open. However, neighbouring development has reduced the sense of openness in parts and weakened its rural character. The Green Belt designation within this parcel plays a moderate role safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The road along the northern and boundary of the parcel would form a more consistent and readily recognisable Green Belt boundary than the existing urban edge of Stanmore Industrial Estate. The eastern edge of the parcel is bound by hedgerows and farm track which does not constitute a strong boundary.

Harm to Green Belt Resulting from Release

The southern and western part of Parcel P58 is contained by the adjacent Stanmore Industrial Estate which exerts a sense of encroachment within parts of the parcel. Land within the parcel contains agricultural fields, paddocks and lines of trees and is open constituting part of the wider countryside to the northeast of Stanmore industrial Estate. Releasing this parcel from the Green Belt could lead to encroachment on the countryside within the parcel itself but its relative containment would limit the harm to the wider Green Belt. Due to the containment by existing development to the south and west the release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P59

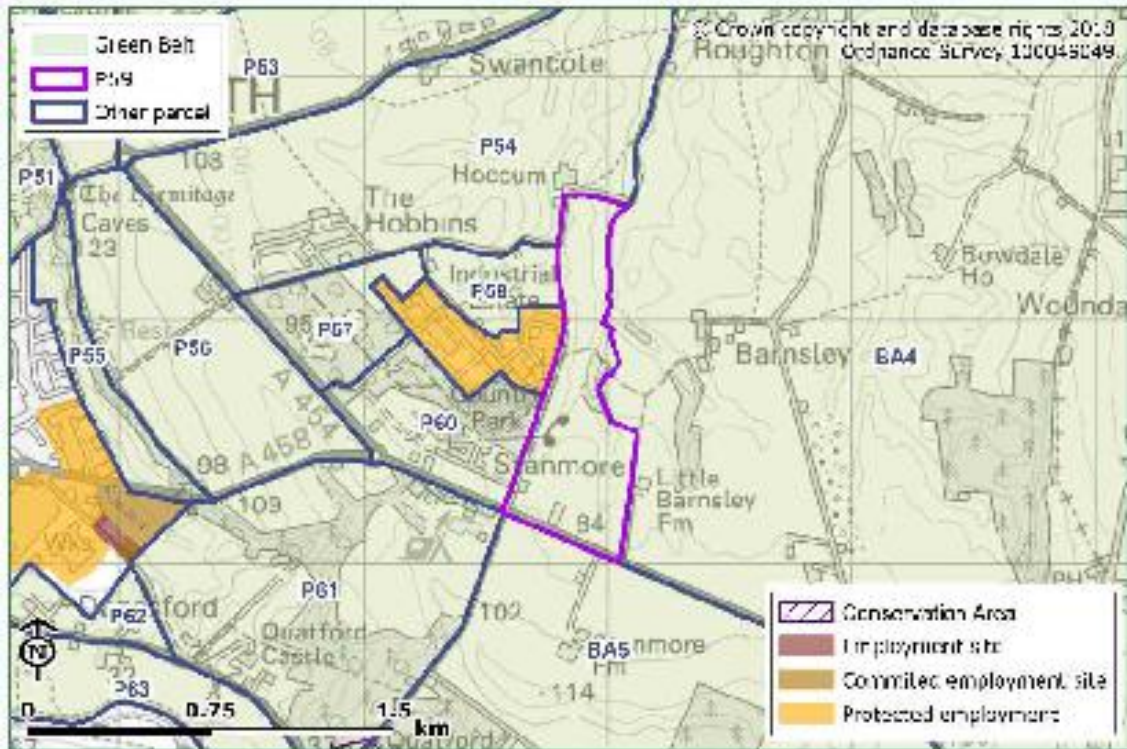


Figure A3.18: Parcel P59



Figure A3.19: Rolling farmland within parcel P59, view southeast from the northern edge of the parcel.

Relationship to settlement/countryside

Part of the western edge of parcel P59 adjoins Stanmore Industrial Estate which is inset in the Green Belt and exerts a level of urban encroachment in the parcel. However this is limited with the parcel comprising open rolling agricultural land which is strongly associated with the wider countryside to the east.

The conclusions about the performance of Parcel P59 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 1.5km east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is some sense of encroachment within the parcel as a result of the Stanmore Industrial Estate which lies adjacent to part of the western border of the parcel. A garden centre is also located within the south of the parcel (this is considered to be an urbanising influence) and a couple of dwellings. However the land parcel contains the characteristics of countryside, and is open. The Green Belt plays a strong role safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the north and south of the parcel and the woodland block to the east of the parcel would form readily recognisable Green Belt boundaries. However, the majority of the parcel is bound by hedgerows and tracks, which would not form durable boundaries any stronger than the existing urban edge of Stanmore Industrial Estate.

Harm to Green Belt Resulting from Release

There is a limited sense of existing encroachment within parts of the parcel as a result of the adjacent Stanmore Industrial Estate. However, the parcel is open, comprising agricultural land and has a strong connection with the wider countryside. Releasing this parcel from the Green Belt would lead to significant encroachment on the countryside and a weakening of the contribution neighbouring areas of Green Belt make to Purpose 3. The release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

Parcel P60

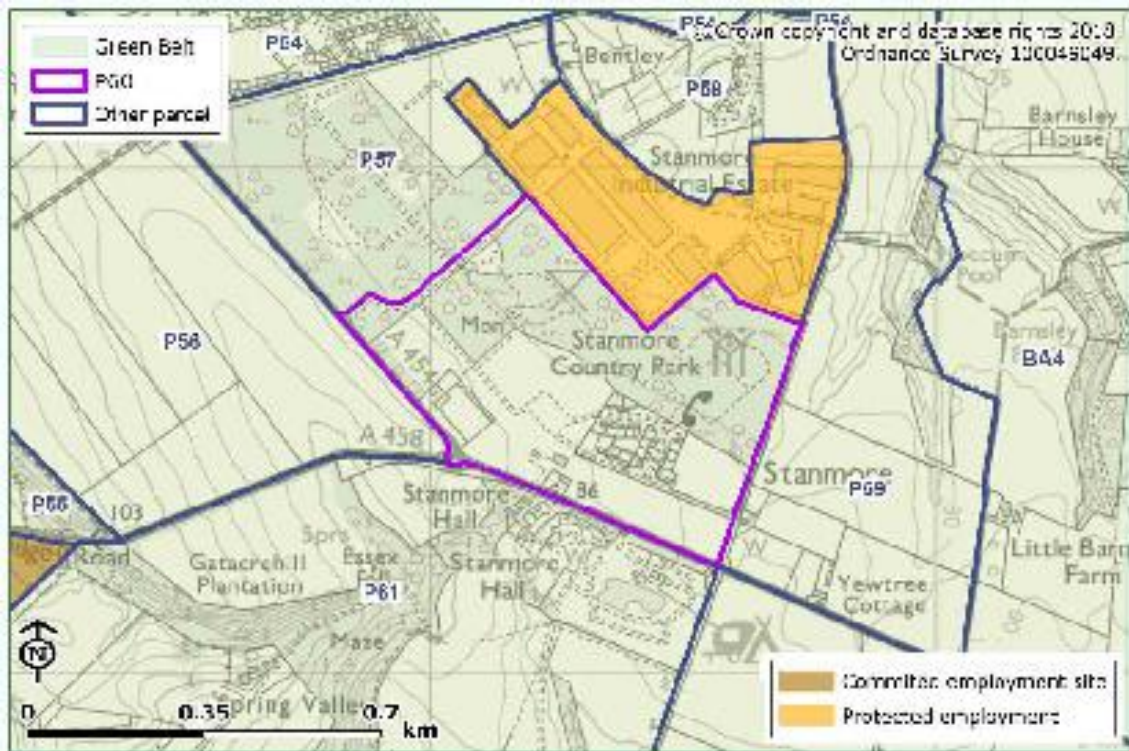


Figure A3.20: Parcel P60



Figure A3.21: Horse paddock along the eastern edge of P60, view east from the eastern edge of Russell Close.

Relationship to settlement/countryside

Parcel P60 is located adjacent to the south of Stanmore Industrial Estate which is inset in the Green Belt. Woodland within Stanmore County Park is located in the north of the parcel and a plant nursery is located in the southwest. The west of the parcel also contains the small hamlet of Stanmore which consists of a housing estate of military origin. The parcel is bound by the A458 to the south, the A454 to the southwest, and a minor access road to the northwest. The industrial estate to the north, and Stanmore Hall caravan park, set within mature woodland to the south, provide a degree of containment and separate the parcel from the wider countryside to the north and south. On balance the parcel has a closer association with development located within it and existing development to the north and south, than the wider countryside.

The conclusions about the performance of Parcel P60 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 700m east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between settlements.

It is acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate. Stanmore Industrial Estate is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as it is bordered to the north by the Stanmore Industrial Estate. However, much of the parcel is sheltered from this by a thick band of woodland along the northern half of the parcel. In addition, the parcel contains the hamlet of Stanmore, a cluster of houses to the northeast of the parcel and a garden centre to the south. The remaining areas are wooded or in agricultural use. Overall the land parcel does contain the characteristics of countryside and is relatively open. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

The south-eastern corner of this parcel comprises the small hamlet of Stanmore, as well as a small pastoral field and horse paddock. The small pastoral field and horse paddock are contained by Stanmore and woodland to the north and woodland that encloses Stanmore Caravan Park to the south. This provides a degree of separation between it and the wider parcel. This area is considered to be playing a weaker role against Purpose 3.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the south and northwest of the parcel would form alternative Green Belt boundaries that are more readily recognisable and stronger than the existing urban edge of Stanmore Industrial Estate. The east of the parcel is defined by a minor access road, hedgerows and a woodland edge with no potential stronger alternative Green Belt boundaries.

Harm to Green Belt Resulting from Release

Parcel P60 contains residential development and is contained by development to the north and south. Much of the parcel comprises woodland and agricultural land and is relatively open. Releasing this parcel from the Green Belt would lead to some encroachment on the countryside. However its containment to the north and south and extent of existing development within the parcel mean the release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P61

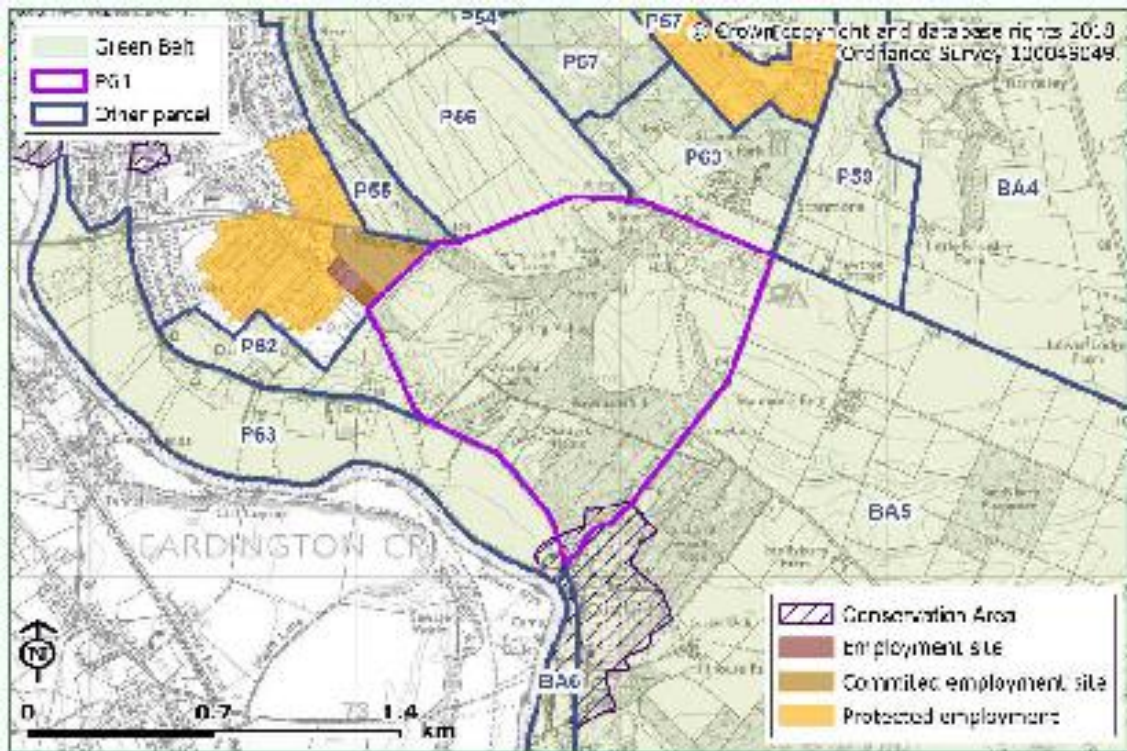


Figure A3.22: Parcel P61



Figure A3.23: Rolling farmland and woodland within parcel P61, view west.

Relationship to settlement/countryside

Parcel P61 adjoins the southeast of the urban area of Bridgnorth and comprises land which slopes down to the west forming part of the eastern valley side of the River Severn. The landcover is predominantly agricultural land and mature woodland some of which is designated as ancient woodland. Stanmore Hall Caravan Park is located in the northeast of the parcel. Large industrial buildings on the fringe of Bridgnorth overlook parts of the parcel and provide a sense of encroachment along the western edge of the parcel. The north of the parcel is bounded by the A458, the south of the parcel is bounded by the A442 and a minor road, and the east of the parcel is bounded by a country lane. Quatford Wood House Woodland also adjoins the southeast of the parcel. The parcel is largely undeveloped and open and on balance is more closely associated with the wider countryside to the east, than the urban area of Bridgnorth.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Stourbridge with the West Midlands conurbation beyond. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as a result of the presence of Stanmore Hall Caravan Park to the north of the parcel and a few clusters of houses surrounded by Quatford Castle in the south of the parcel. Additionally, large industrial buildings (Bridgnorth Aluminium) within the urban area of Low Town (Bridgnorth), adjacent to the west, are visually prominent from the steep land in the far west of the parcel. However, these urbanising influences are limited with the parcel remaining relatively open and display many of the characteristics of the countryside. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, the elevated land in the east of this parcel has some intervisibility with the historic settlement areas within Bridgnorth, however this is relatively limited. The openness of the land and its rural character do not play an important role in the immediate setting of this historic settlement, but contribute to preserving the wider rural setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the parcel would form readily recognisable Green Belt boundaries and would form stronger boundaries than the current urban edge along the industrial sites to the west.

Harm to Green Belt Resulting from Release

Parcel P61 contains some development, including a caravan park in the northeast of the parcel and a few clusters of houses and Quatford Castle in the south of the parcel. Large industrial buildings within the urban area of Bridgnorth are also visible in the far west of the parcel. These features exert a slight sense of urban encroachment within parts of the parcel; however the majority of the parcel is open and comprises rolling agricultural land and woodland (some designated as ancient woodland). Releasing this parcel from the Green Belt would lead to significant encroachment on a large area of countryside and a weakening of neighbouring Green Belt land in relation to Purpose 3. The release of this parcel from the Green Belt would lead to a **Moderate - High** level of harm to the Green Belt in this local area.

Parcel P62

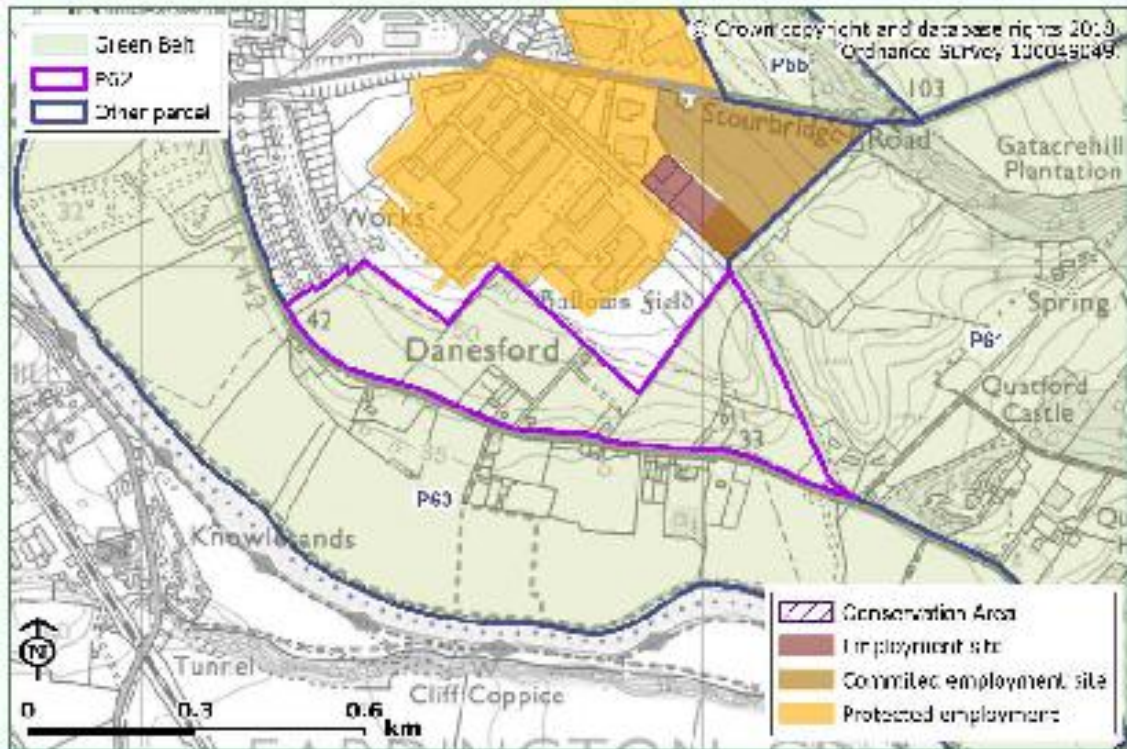


Figure A3.24: Parcel P62



Figure A3.25: View of parcel P62 looking north from the A442.

Relationship to settlement/countryside

Parcel P62 is located on the southern eastern edge of Bridgnorth and comprises sloping agricultural land and part of the hamlet of Danesford. The parcel adjoins agricultural land to the south and west, however the A442 to the south and slope of the land with woodland to the west, separate the parcel from the wider countryside. The adjoining industrial and residential development to the north and west has a substantial urbanising influence on the character of the parcel. The parcel has a closer association with the settlement edge than the wider countryside.

The conclusions about the performance of Parcel P62 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Highley which are considered under Purpose 2 in this assessment. However, these settlements are over 7km apart from each other. The parcel also lies between the settlements of Bridgnorth and Stourbridge & Kidderminster. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is a sense of encroachment within the parcel as a result of the visual prominence of the settlement edge of Low Town (Bridgnorth) and the large buildings located within an industrial estate adjacent to the northern border (Bridgnorth Aluminium). Additionally, part of the hamlet of Danesford is contained within the south of the parcel and the busy A442 runs along the southern border. The parcel contains a mix of small arable and pastoral fields, it displays some characteristics of the countryside and is relatively open, however it lacks rural character. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, the undulating land within this parcel has very little intervisibility with the historic settlement areas within Bridgnorth. The openness of the land does not play an important role in the immediate setting of this historic settlement, but contributes marginally to preserving the wider setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the parcel to the south and east would constitute a more consistent and readily recognisable Green Belt boundary than the existing urban edge along the industrial sites to the north.

Harm to Green Belt Resulting from Release

The visually prominent residential and industrial buildings adjoining the parcel have a strong influence on the parcel. The parcel is predominantly open and contains a mix of small arable, pastoral fields and residential properties forming part of the hamlet of Danesford. Releasing this parcel from the Green Belt would lead to some encroachment on the countryside. However the roads bounding the parcel to the south and east would constitute a more consistent and readily recognisable Green Belt boundary than the existing urban edge along the industrial sites to the north and the parcels containment by development to the north, and to a more limited extent to the south by further properties in Danesford mean the release of this parcel from the Green Belt would lead to a **Low-Moderate** level of harm to the Green Belt in this local area.

Parcel P63

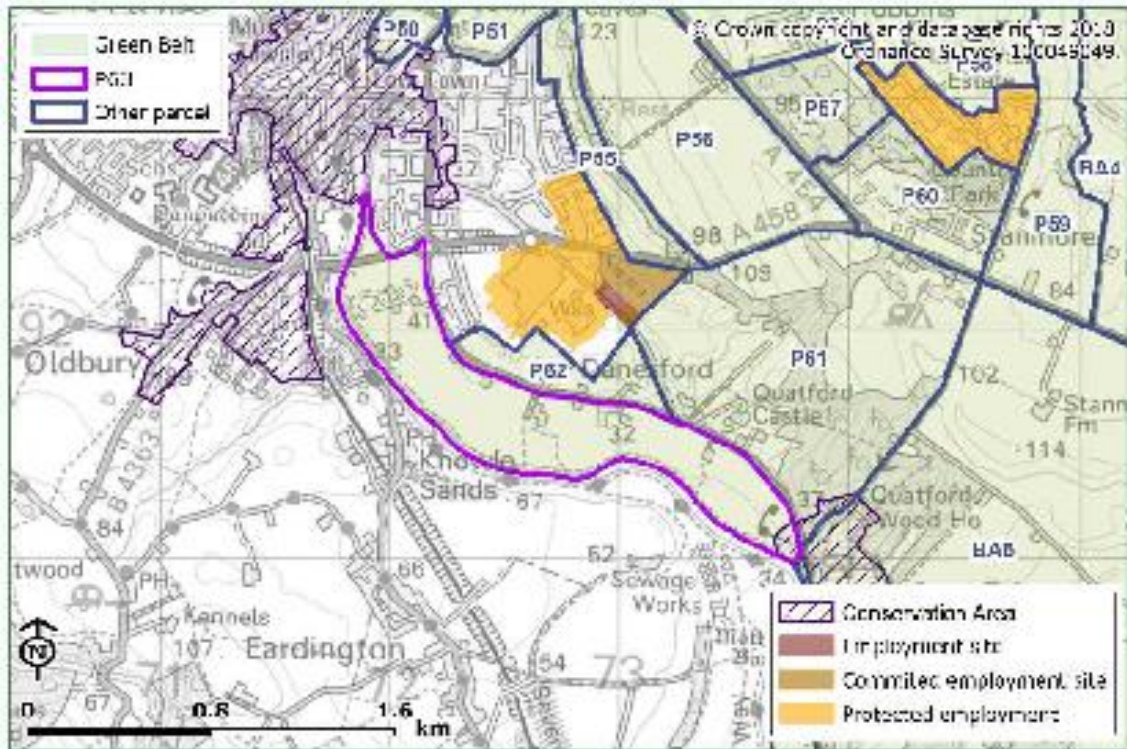


Figure A3.26: Parcel P63



Figure A3.27: Flat floodplain within parcel P63 with Caravan Park seen in the background, view north from the western edge of the parcel.

Relationship to settlement/countryside

Parcel P63 adjoins the southern edge of Bridgnorth and consists predominantly of agricultural land forming part of the River Severn floodplain. Part of the hamlet of Danesford and the Riverside Caravan Park are also contained within the parcel. The parcel is bounded along the western and southern edges by the River Severn, to the north by the settlement edge and to the east by the A442. These provide containment of the parcel from the surrounding countryside. The north of the parcel is crossed by the A458. The parcel is however predominantly agricultural land and has a closer association with the surrounding countryside than the built up area.

The conclusions about the performance of Parcel P63 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Highley which are considered under Purpose 2 in this assessment. However, these settlements are over 7km apart from each other. The parcel also lies between the settlements of Bridgnorth and Stourbridge/Kidderminster. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is a sense of encroachment within the parcel as a result of the visual prominence of settlement edge of Low Town (Bridgnorth) which includes large industrial buildings (Bridgnorth Aluminium) located adjacent to the north-eastern border, the A442 that defines part of the north eastern border, and the A458 (Bridgnorth bypass) and River Severn Bridge passes through the north of the parcel. Additionally, part of the hamlet of Danesford and The Riverside Caravan Park are contained within the parcel. However, despite these urbanising influences the parcel remains largely open comprising relatively large flat arable and pastoral fields, residential garden grounds and small paddocks. The parcel displays characteristics of the countryside and is generally rural in character, although this character is weaker in places, especially in the north. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

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

Strong

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, land within the far north of the parcel that forms a flat river terrace of Severn and has good intervisibility with the historic settlement areas within Bridgnorth. The openness of this land plays an important role in the immediate setting of Bridgnorth Conservation Area and contributes positively to the historic significance of the settlement.

The Riverside Caravan Park and adjoining small pastoral field to the south have a reduced sense of openness and are largely screened from the Bridgnorth Conservation Area by the A458 (Bridgnorth bypass) River Severn Bridge. This area is considered to play a weaker role against purpose 4.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The existing Green Belt boundary comprises the River Severn to the south of the parcel and the existing settlement edge of Bridgnorth to the north. Release of parcel P63 would lead to the creation of a new Green Belt boundary along the A442, which whilst readily recognisable would not constitute as strong a Green Belt boundary as the River Severn.

Harm to Green Belt Resulting from Release

Parcel P63 contains a limited amount of built development, including the A458 and caravan park in the north of the parcel and part of the hamlet of Danesford in the south of the parcel. However, the parcel is open and predominantly comprises agricultural land. The land in the far north of the parcel contributes to the setting of the historic areas within Bridgnorth, although the caravan park in the north of the parcel limits this. Releasing this parcel from the Green Belt would have some impact on the setting of the historic town and lead to encroachment on the countryside. It is considered that the release of this parcel from the Green Belt would lead to a **Moderate-High** level of harm to the Green Belt in this local area.

Conclusion

Figure A3.28 below shows the level of harm associated with the release of parcels/sub-parcels considered within the assessment around Bridgnorth.

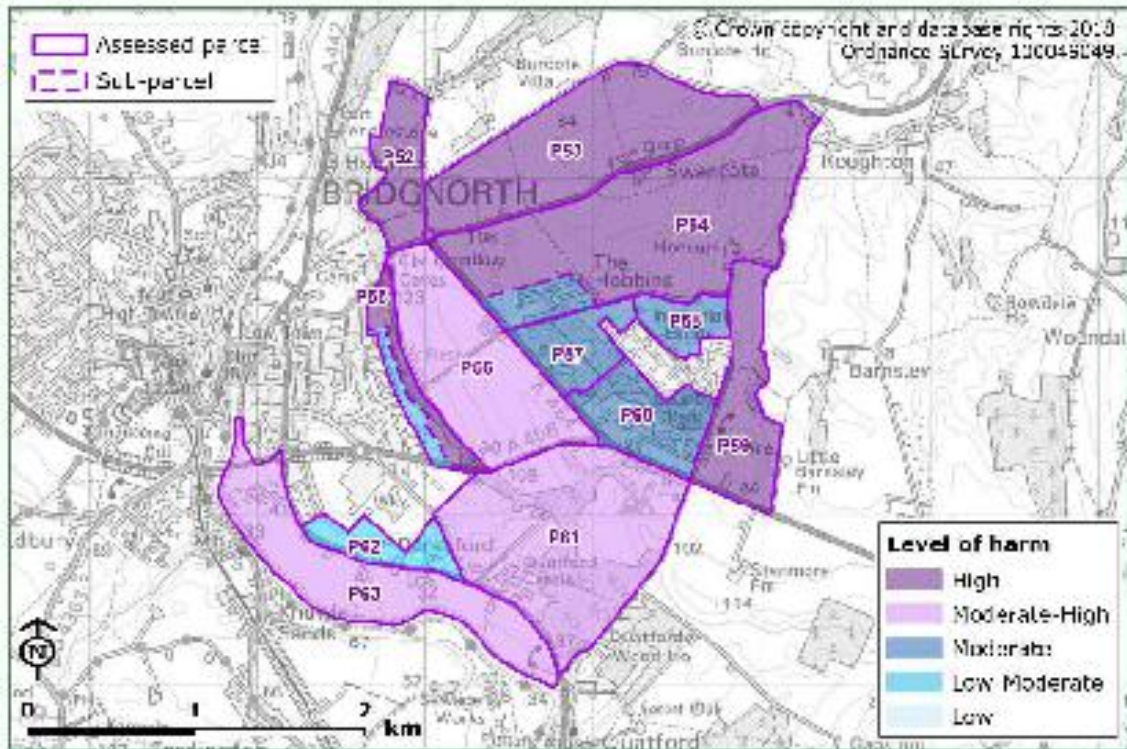


Figure A3.28: Individual Harm from Release of Parcels Surrounding Bridgnorth

The parcel assessment summarised on Figure A3.28 above indicates that the release of Green Belt land for development could result in a 'high' level of harm to the Green Belt in the far northeast and east (parcels P52, P53, P54, P59), as well as land (designated as ancient woodland) which forms the eastern extent of parcel P55. The release of land for development to the south of Bridgnorth (parcel P61 and P63) and to the east of Bridgnorth to the west of the A454 (Parcel P56) could result in a 'moderate-high' level of harm. In comparison, the release of land for development to the west, north and south of Stanmore Industrial Estate (parcels P57, P58 and P60), as well as the smaller sub-parcel P54 could result in a 'moderate' level of harm. Releasing the Green Belt land directly adjoining the south of Bridgnorth (Parcel P62 and sub-parcel P55) could result in a 'low-moderate' level of harm.

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

The assessment of the harm that could be caused by releasing Green Belt land for development has been tested through the identification of three distinct Opportunity Areas around Bridgnorth and by the identification of three further Sub-Opportunity Areas. The findings of these assessments are set out below.

Opportunity Area Bn-1

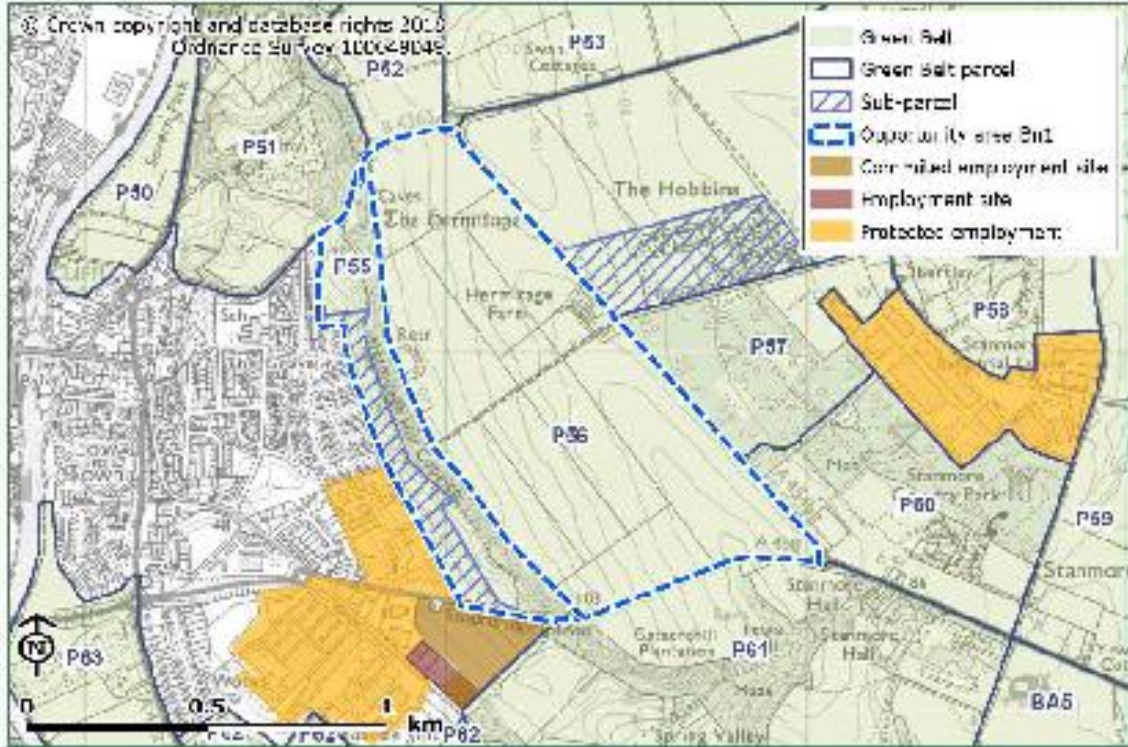


Figure A3.29: Opportunity Area Bn-1

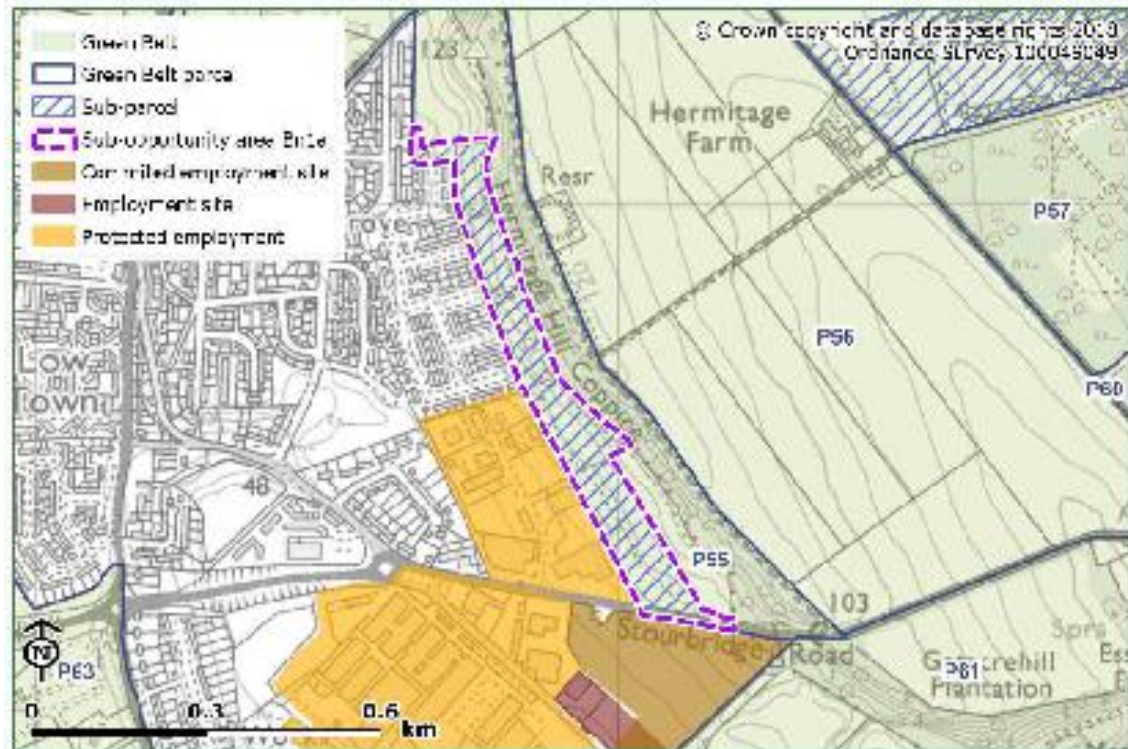


Figure A3.30: Sub Opportunity Area Bn-1a

Description of Opportunity Area Bn-1

Opportunity Area Bn-1 comprises the entire areas of parcels P56 and P55 to identify a potential direction for growth across the eastern boundary of Bridgnorth.

Sub-opportunity Area Bn-1a

A sub-opportunity area has been identified that would lead to a lower level of overall harm to the Green Belt. Sub-opportunity Area Bn-1a comprises the release of sub-parcel P55.

Summary of Assessment of Harm for Individual Parcels

The individual release of parcel P55 would have a **High** level of harm on the Green Belt. The individual release of parcel P56 would have a **Moderate-High** level of harm on the Green Belt.

Assessment of Harm for sub-parcels

The release of Sub-parcel P55 would have a **Low-Moderate** level of harm on the Green Belt.

Assessment of harm

Removal of Opportunity Area Bn-1

The removal of Bn-1 would result in development being sited beyond the current settlement edge of Bridgnorth on open agricultural land to the east of the distinctive band of ancient woodland of 'Hermitage Hill Coppice'. The land within parcel P56 slopes down to the east with the western areas of the parcel being more elevated and visually prominent than the surrounding land. Development within this parcel would be visible from neighbouring areas of Green Belt land, particularly to the north and northeast and would encroach on these areas of open countryside. The presence of established woodland within Stanmore Country Park and Stanmore Industrial Estate provide a degree of visual separation between parcel P56 and the wider countryside to the southeast, therefore the sense of encroachment resulting from this Green Belt release is likely to be lower. This woodland within P55 plays a key role in the setting of the historic settlement area within Bridgnorth therefore the release of Opportunity Area Bn-1 could significantly weaken the role of the Green Belt with regard to Purpose 4. The release of Opportunity Area Bn-1 would lead to a **High** level of harm to the Green Belt in this local area.

High Harm

No mitigation measures have been identified, as release of the opportunity area would have a high level of harm on the Green Belt.

Removal of Sub-opportunity Area Bn-1a

Sub-parcel P55 consists of a narrow strip of sloping grazing land set between Hermitage Hill Coppice woodland to east and the urban edge of Bridgnorth to the west. The adjoining settlement has a strong influence on the sub-parcel and woodland separates the land from the wider countryside to the east. The openness of the land does not play a key role in the setting of the historic town of Bridgnorth. Releasing Sub-opportunity Area Bn-1a would lead to a **Low-Moderate** level of harm to the integrity of the Green Belt in this local area.

Low-Moderate Harm

The following section sets out the mitigation measures that could be considered in order to minimise the degree of harm to the Green Belt associated with the release of Bn-1a.

Mitigation Measures

- Trees within 'Hermitage Hill Coppice' along the eastern edge of the Sub-parcel P55 should be retained and protected against any construction activity in accordance with best practice. These trees play a key role in preserving the setting of the historic town of Bridgnorth.

- Development within Sub-opportunity Area Bn-1a should be restricted to appropriate small scale and low density residential development of up to two storeys, or single storey employment development to minimise encroachment on neighbouring Green Belt land.
- Where possible, existing hedgerows along the road bounding south of the sub-parcel should be retained and enhanced to create coherent new Green Belt boundaries.

Opportunity Area Bn-2

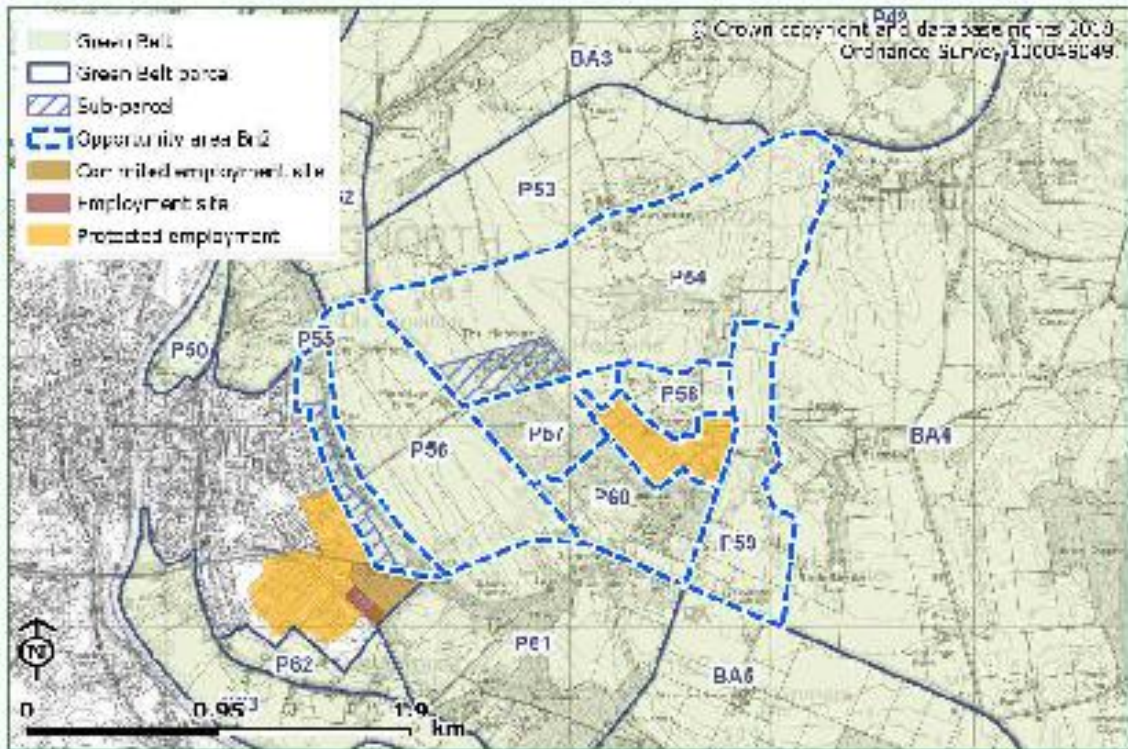


Figure A3.31: Opportunity Area Bn-2

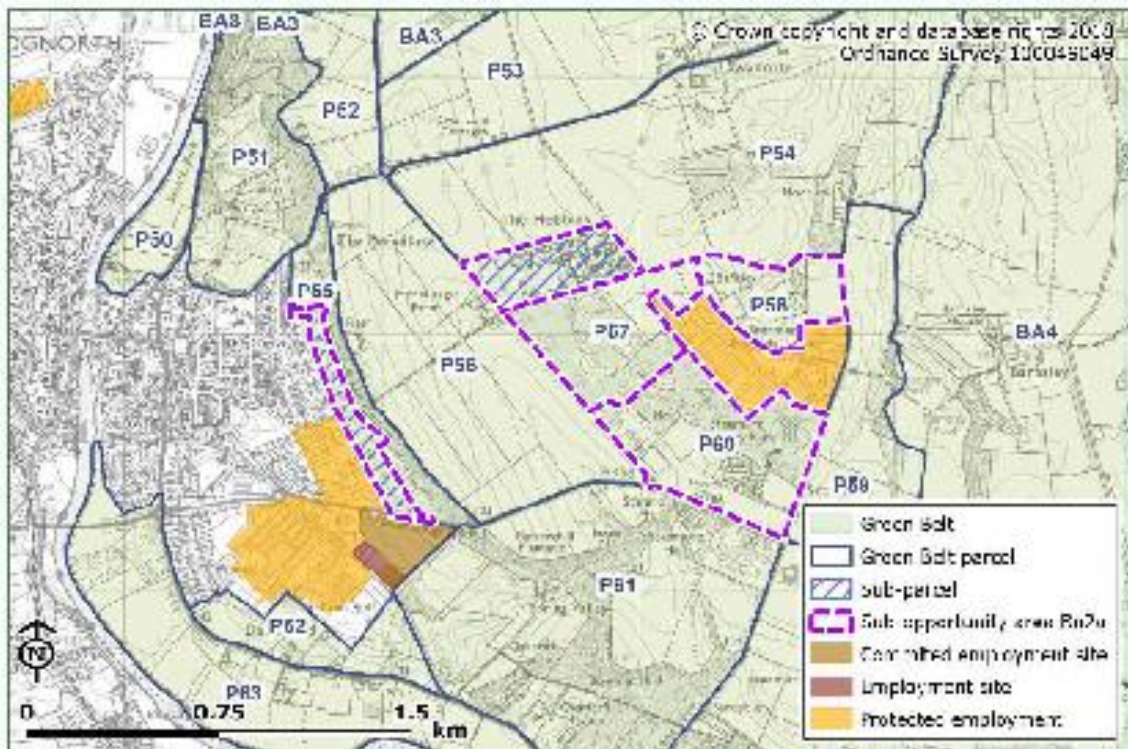


Figure A3.32: Sub-opportunity Area Bn-2a

Description of Opportunity Area Bn-2

Opportunity Area Bn-2 comprises the entire area of parcels P54, P55, P56, P57, P58, P59 and P60 to identify a potential direction for growth across the eastern boundary of Bridgnorth.

Sub-opportunity Area Bn-2a

One sub-opportunity area has been identified that would lead to a lower level of overall harm to the Green Belt. Sub-opportunity Area Bn-2a comprises the release of parcels P57, P58 and P60, as well as sub-parcels P54 and P55.

Summary of Assessment of Harm for Individual Parcels

The individual release of parcels P54, P55 and P59 would have a **High** level of harm on the Green Belt. The individual release of parcel P56 would have a **Moderate-High** level of harm on the Green Belt. The individual release of parcels P57, P58 and P60 could have a **Moderate** level of harm on the Green Belt.

Assessment of Harm for sub-parcels

The individual release of parcels P57, P58 and P60, and Sub-parcel P54 would have a **Moderate** level of harm on the Green Belt. The individual release of Sub-parcel P55 could have a **Low-Moderate** level of harm on the Green Belt.

Assessment of harm

Removal of Opportunity Area Bn-2

Parcels P54, P56, P58 and P59 form part of a wide area of open countryside located to the east of Bridgnorth. Releasing the entirety of these parcels from the Green Belt would constitute significant encroachment on the countryside. There is no separation between these parcels and the adjoining areas of open countryside and their release is likely to weaken the contribution of neighbouring Green Belt land to Purpose 3. The 'Hermitage Hill Coppice' woodland along eastern edge of parcel P55 also plays a key role in the setting of the historic town of Bridgnorth,.

The release of the Opportunity Area Ab2 would lead to a **High** level of harm to the Green Belt in this local area.

High Harm

No mitigation measures have been identified, as release of the opportunity area would have a high level of harm on the Green Belt

Removal of Sub-opportunity Area Bn-2a

The sub-parcel P55 is located along the settlement edge of Bridgnorth and is not part of the wider countryside and does not play a key role in the setting of Bridgnorth. Sub-parcel P54 is partly contained by development and does not have a strong connection to the wider countryside. Parcels P57 P58 and P60 are also partly enclosed by development and P60 contains the hamlet of Stanmore. The partial containment of these areas limits the harm of their release on the wider Green Belt. Removal of the sub-opportunity area could however lead to a degree of encroachment on P56 in relation to Purpose 3. As Stanmore is not a town considered under Purpose 2, release of the sub-opportunity area would not have any effect in relation to Purpose 2 – preventing the merging of towns.

Releasing Sub-opportunity Area Bn-2a from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Moderate Harm

The following section sets out the mitigation measures that could be considered in order to minimise the degree of harm to the Green Belt associated with the release of *Bn-2a*.

Mitigation Measures

- Trees within Hermitage Hill Coppice along the eastern edge of the Sub-parcel P55 should be retained and protected against any construction activity in accordance with best practice. These trees play a key role in preserving the setting of the historic settlement area within Bridgnorth.

- Hedgerows and tree belts along the boundaries of parcels P57 and P60 should be retained and enhanced, to limit the potential harm to P56 in relation to Purpose 3.
- The hedgerows that line the boundaries of P58 and sub-parcel P54 should be retained and enhanced, with any gaps strengthened and new hedgerows/trees planted.
- Development within Sub-opportunity Area Bn-2a should be restricted to appropriate small scale and low density residential development of up to two storeys, or single storey employment development, to minimise encroachment on neighbouring Green Belt land.

Opportunity Area Bn-3

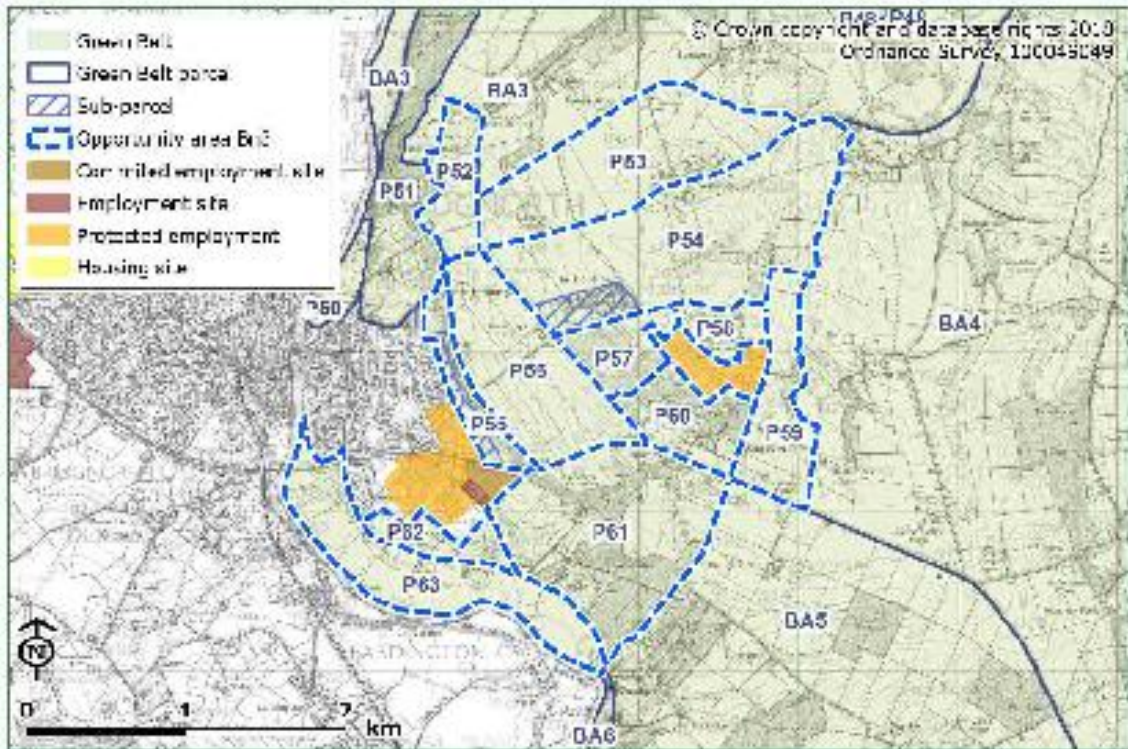


Figure A3.33: Opportunity Area Bn-3

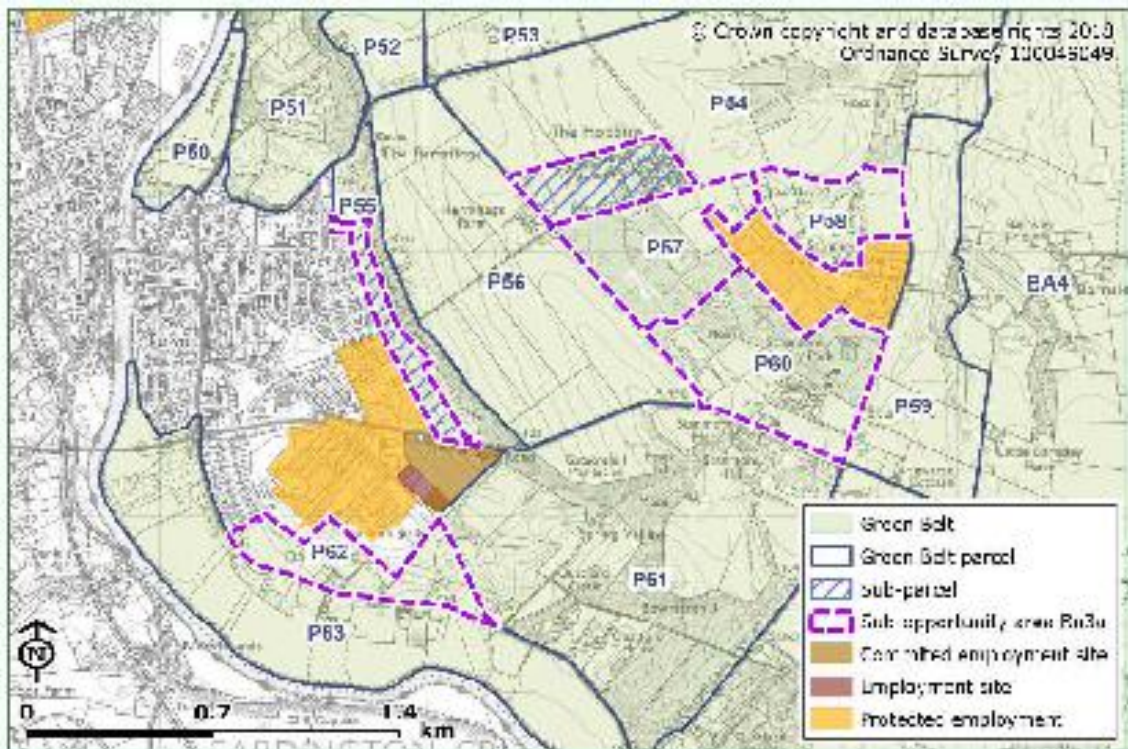


Figure A3.34: Sub-opportunity Area Bn-3a

Description of Opportunity Area Bn-3

Opportunity Area Bn-3 comprises the entire area of parcels P52, P53, P54, P55, P56, P57, P58, P59, P60, P61, P62 and P63 to identify a potential direction for growth across the eastern, north eastern and south eastern boundary of Bridgnorth.

Sub-opportunity Area Bn-3a

A sub-opportunity area has been identified that would lead to a lower level of overall harm to the Green Belt. Sub-opportunity Area Bn-3a comprises the release of parcels P57, P58, P60 and P62, and the release of sub-parcels P54 and P55.

Summary of Assessment of Harm for Individual Parcels

The individual release of parcels P52, P53, P54, P55, P59 and would have a **High** level of harm on the Green Belt. The individual release of parcels P56, P61 and P63 would have a **Moderate-high** level of harm on the Green Belt. The individual release of parcels P57, P58 and P60 would have a **Moderate** level of harm on the Green Belt. The individual release of Parcel P62 would lead to a **Low-Moderate** level of harm to the Green Belt in the local area.

Assessment of Harm for sub-parcels

The individual release of parcels P57, P58 and P60, and sub-parcels P54 would have a **Moderate** level of harm and P61 a **Moderate-high** level of harm on the Green Belt. The individual release of sub-parcels P55 and P62 would lead to a **Low-Moderate** level of harm to the Green Belt in the local area.

Assessment of harm

Removal of Opportunity Area Bn-3

Parcels P52, P53, P54, P56, P58, P59 and P61 form part of a wide area of open countryside located to the east of Bridgnorth. Releasing these parcels from the Green Belt would constitute significant encroachment on the countryside. There is no separation between these parcels and the adjoining areas of open countryside and their release is likely to weaken the contribution of neighbouring Green Belt land to Purpose 3. Furthermore, the 'Hermitage Hill Coppice' ancient woodland along the eastern edge of parcel P55 plays a key role in the setting of the historic town of Bridgnorth.

The release of the Opportunity Area Bn-3 would lead to a **High** level of harm to the Green Belt in this local area.

High Harm

No mitigation measures have been identified, as release of the opportunity area would have a high level of harm on the Green Belt

Removal of Sub-opportunity Area Bn-3a

Sub-parcel P55 is located along the settlement edge of Bridgnorth and is not part of the wider countryside and does not play a key role in the setting of Bridgnorth. Sub-parcel P54 is partly contained by development and does not have a strong connection to the wider countryside. Parcel P57, P58 and P60 are also partly enclosed by development and P60 contains the hamlet of Stanmore. Parcel P62 adjoins the industrial and residential settlement edge of Bridgnorth and is partly separated from open land to the south by the A442 and properties along the road. The partial containment of these areas limits the harm of their release on the wider Green Belt. Removal of the sub-opportunity area would however lead to a degree of encroachment on P56 in relation to Purpose 3. As Stanmore is not a town considered under Purpose 2, release of the Sub-opportunity area would have no effect in relation to Purpose 2 – preventing the merging of towns.

Releasing Sub-opportunity Area Bn-3a from the Green Belt will lead to a **Moderate** level of harm to the Green Belt in this local area.

Moderate Harm

The following section sets out the mitigation measures that could be considered in order to minimise the degree of harm to the Green Belt associated with the release of Bn-3a.

Mitigation Measures

- Trees within Hermitage Hill Coppice along the eastern edge of the Sub-parcel P55 should be retained and protected against any construction activity in accordance with best practice. These trees play a key role in preserving the setting of the historic settlement area within Bridgnorth.
- Hedgerows and tree belts along the boundaries of parcels P57 and P60 should be retained and enhanced to limit the potential harm to P56 in relation to Purpose 3.
- The hedgerows that line the boundaries of P58 and sub-parcel P54 should be retained and enhanced, with any gaps strengthened and new hedgerows/trees planted.
- Hedgerows and trees along either side of the A442 and Old Worcester Road along the southern and eastern boundary of parcel P62 should be retained and enhanced, with any gaps strengthened and new hedgerows/trees planted.
- Development within Sub-opportunity Area Bn-3a should be restricted to appropriate small scale and low density residential development of up to two storeys, or single storey employment development to minimise encroachment on neighbouring Green Belt land.

Part 4: Conclusions for Bridgnorth

The assessment has reviewed the potential harm to the Green Belt of releasing for development, individual parcels or sub-parcels identified in this Green Belt Review. This has subsequently informed the identification of three opportunity areas; and three sub-opportunity areas around the settlement of Bridgnorth.

The findings of the assessment of harm likely to result from releasing the opportunity areas or sub-opportunity areas for development are summarised in **Table A3.1**.

Table A3.1: Assessment of Harm for Opportunity Areas within Bridgnorth

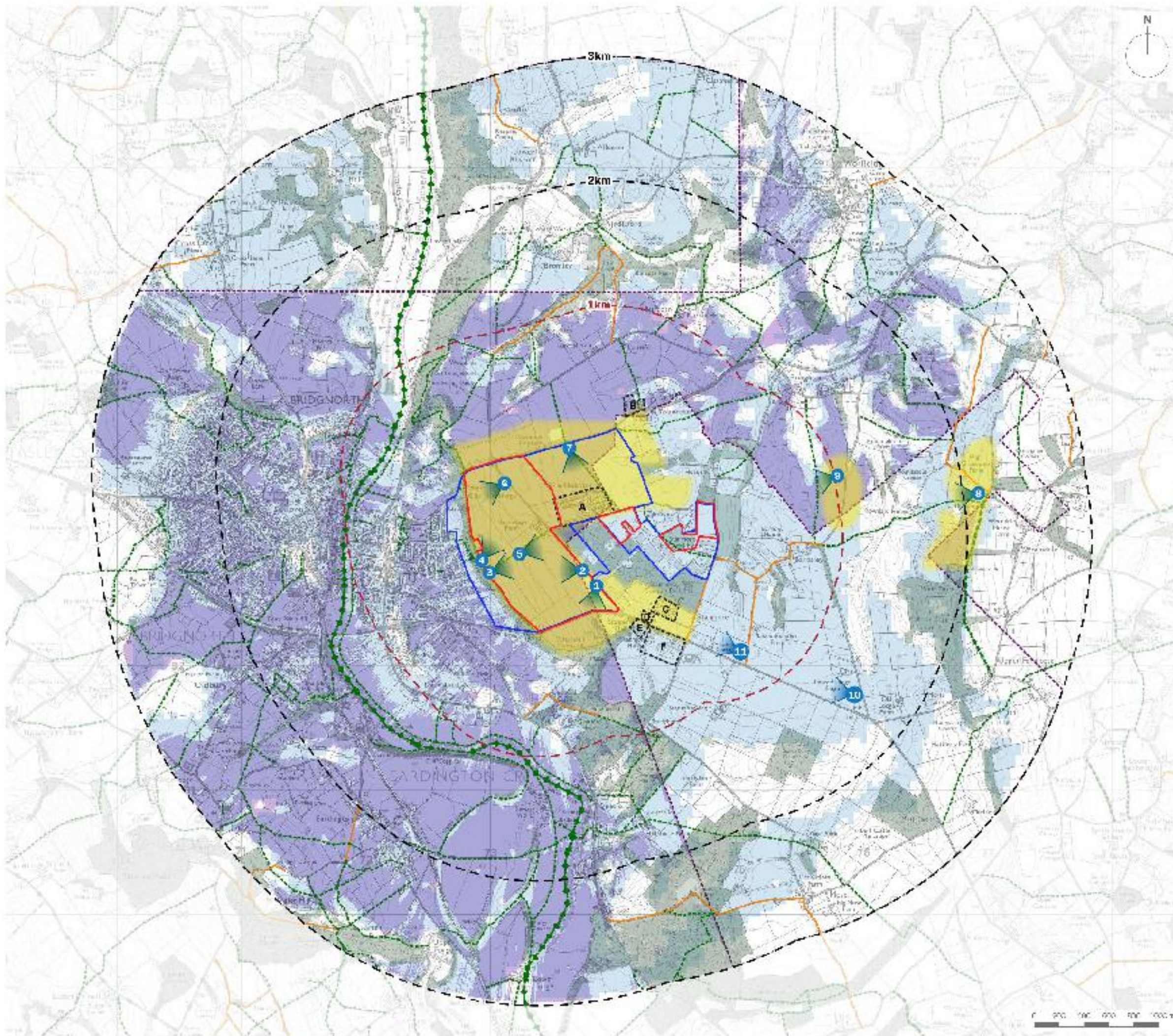
Opportunity Area Reference	Area (ha)	Rating
Bn-1	100.6	High
Bn-1a	7.2	Low-Moderate
Bn-2	369.1	High
Bn-2a	93.4	Moderate
Bn-3	704.2	High
Bn-3a	110.6	Moderate

The consideration of the release of Green Belt land around Bridgnorth, set out in detail in the preceding sections and summarised in the table above, highlights the various potential Green Belt impacts arising from the possible release of land for development to meet the future needs of the settlement of Bridgnorth. The assessment in this Green Belt Review has shown that, 7.2ha of land (within opportunity area Bn-1a) could be released from the Green Belt for development with only low-moderate harm to the Green Belt, and up to 110.6ha of land could be released with moderate harm (under opportunity area Bn-3a).

Whilst development on Green Belt land may inevitably lead to some degree of encroachment into the countryside within the Green Belt, the strategic function of the West Midlands Green Belt will not be affected by such small scale releases of land in Bridgnorth. At both a strategic level and local level, there will be no harm to the role played by the West Midlands Green Belt in checking the unrestricted sprawl of the large built areas, preventing the merging of neighbouring towns, or preserving the setting and special character of historic towns.



Appendix EDP 5
Findings of Visual Appraisal
(edp5653_d006a 08 September 2020/RB/VP/GY)



- Site Boundary
- Previous Site Boundary
- Range Rings (at 1km intervals)
- 1km Delineated Study Area
- Visual Analysis**
- Photoviewpoint Locations
- Focuseh
- Brideway
- Ryway
- Promoted Route: The Severn Way
- Zone of Primary Visibility
- Zone of Theoretical Visibility (2m DSM)
- 2m DSM No-coverage Area
- Zone of Theoretical Visibility (50m DTM)
- Residential Receptors
- Woodland (Mature Trees, Greenery)

Zone of Theoretical Visibility (ZTV) was calculated using a computer modelling programme which uses the following parameters:

- 1.0m Receiver Elevation (Observer Height)
- 1.5m Top of Road Elevation (Assessor's Sight Height)
- 1.50m Target Object Height
- 0.02m/sec 2m Digital Terrain Model (DTM) resolution (1:2000)
- 1.5m Target Elevation on 1:2000 DTM (1.5m above 1:2000 DTM)

Source: www.maptools.com/layer

Client: **Stanmore Consortium**

Project title: **Stanmore Village, Bridgnorth**

Drawing title: **Plan EDP & Findings of Visual Appraisal**

date:	08 SEPTEMBER 2020	drawn by:	FB
drawing number:	edp3053 d00a	checked by:	VP
scale:	1:50 (A0) @ A3	QA:	RY

Appendix 2 - Reg 18 - Landscape & Visual Appraisal - prepared by EDP - September 2020



**Stanmore
Village,
Bridgnorth**

**Landscape and
Visual Appraisal**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
**Stanmore
Consortium**

September 2020
Report Reference
edp5653_r002d

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Appendices

Appendix EDP 1	Concept Masterplan
Appendix EDP 2	Methodology: Tables Defining the Thresholds and Definitions of Terminology used in this Appraisal
Appendix EDP 3	Extracts from Shropshire Landscape and Visual Sensitivity Assessment Bridgnorth (2018)
Appendix EDP 4	Representative Photoviewpoints (edp5653_d007a 26 August 2020 VP/VP)

Plans

Plan EDP 1	Site Location and Site Boundaries (edp5653_d001c 08 September RB/VP)
Plan EDP 2	Site Character and Local Context (edp5653_d002c 08 September RB/VP)
Plan EDP 3	Relevant Planning Designations and Considerations (edp5653_d003c 08 September RB/VP)
Plan EDP 4	Published Landscape Character Assessments (edp5653_d004c 08 September RB/VP)
Plan EDP 5	Visual Receptors (edp5653_d005c 08 September 2020 RB/VP)

Plan EDP 6 Findings of Visual Appraisal
(edp5653_d006a 08 September 2020 RB/VP)

This version is intended for electronic viewing only

	Report Ref: edp5653_r002			
	Author	Formatted	Peer Review	Proofed by/Date
002_DRAFT	VP	HF	JB	
002a	VP	-	-	
002b	VP	-	-	
002c	VP	-	-	FD 010920
002d	VP			JM 080920

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Section 1 Introduction, Purpose and Methodology

Introduction

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by the Stanmore Consortium to undertake a Landscape and Visual Appraisal (LVA) to support representations to the emerging Shropshire Local Plan and relates to revised proposals for development of land at Stanmore Village, Bridgnorth ('the site'). The site falls within Shropshire County Council (SCC) Local Planning Authority (LPA).
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham, Shrewsbury and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute⁽¹⁾ specialising in the assessment of the effects of proposed development on the landscape.
- 1.3 This LVA is part of a suite of representation documents accompanying the proposed development summarised in **Section 4** of this LVA (illustrated on the Concept Masterplan at **Appendix EDP 1**). The report sets out the findings of both desk and field-based studies in respect of landscape and visual matters, which have been undertaken to assess the suitability of the site in relation to its potential for mixed use development.
- 1.4 A wider study area (hereafter referred to as the 'previous site boundary') as denoted by the blue outline on **Plan EDP 1** was the subject of the previous promotion but is included within this assessment for contextual background only. This report relates solely to the revised site area as defined on **Plan EDP 1**.

Purpose and Structure of this LVA

- 1.5 The purpose of this LVA is to identify the baseline conditions of the site and surrounding area and to determine those landscape and visual characteristics that might inform the design of the development proposals, including recommendations for mitigation. It then provides an assessment of the landscape and visual effects predicted to arise from development on the site with reference to the baseline analysis.
- 1.6 This report sets out the findings of the LVA for the site and the proposed scheme subject to the site promotion process. Specifically, EDP's work has included the following key items:
 - A review of the planning documentary context for the site;

¹ LI Practice Number 1010

- A desktop study and web search of relevant background documents and maps. EDP's study has included reviews of aerial photographs, web searches, LPA publications and other landscape character assessments. We have also obtained where possible, information about relevant landscape designations such as National Parks, areas of Green Belt, Areas of Outstanding Natural Beauty (AONB) and Registered Parks and Gardens (RPG);
- A field assessment of local site circumstances, including a photographic survey of the character and fabric of the site and its surroundings. The field assessment was undertaken by a Chartered Landscape Architect in good weather conditions; and
- An analysis of the likely landscape and visual effects arising from the proposed scheme as set out in the promotion drawings, combined with informed professional judgements about the effects arising, based on their nature (positive or negative), magnitude and the sensitivity of the receiving environment.

Methodology Adopted for the Assessment

- 1.7 Owing to the limited scale of the proposal, and notwithstanding the requirement to undertake the LVA in line with the correct guidance as issued by the Landscape Institute, the methodology (provided in **Appendix EDP 2**), represents an abridged version of the full methodology used by EDP for larger and more complex and larger sites. Essentially, the appraisal identifies, describes and evaluates the effects at those landscape and visual receptors likely to be subject to an effect, based upon the proposals being considered and the context of the landscape and visual resource surrounding the site. The baseline section below provides the description of those receptors identified following the desktop appraisal and site visit, whilst the following section provides the appraisal.
- 1.8 The proposed development assessed by this LVA is not subject to an Environmental Impact Assessment (EIA). This LVA has, therefore, been undertaken in accordance with the principles embodied in 'Guidelines for Landscape and Visual Impact Assessment – Third Edition (LI/IEEMA, 2013)' (GLVIA3) and other best practice guidance insofar as it is relevant to non-EIA schemes.
- 1.9 EDP has undertaken a comprehensive field assessment of local site circumstances, including a photographic survey of the character and fabric of the site and its surroundings, using photography from a number of representative viewpoints. The field assessment was undertaken by a qualified landscape architect on 23 March 2020 and 20 August 2020 in clear weather conditions.

Study Area

- 1.10 To establish the baseline and potential limit of material effects, the study area has been considered at two geographical scales:

- First, a broad 'study area' of 3km was adopted, allowing the geographical scope of the assessment to be defined based on the extent of views to/from the site, extent of landscape effects and the site's environmental planning context; and
- Second, following initial analysis and subsequent fieldwork, the broad study area was refined down to the land that is most likely to experience landscape effects. The extent of this detailed study area is 1km from the site boundary, although occasional reference may be made to features beyond this area where appropriate. This detailed study area is illustrated on **Plan EDP 1** by virtue of the redline line.

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Section 2 Landscape Appraisal of the Site and its Surroundings

- 2.1 As illustrated on **Plan EDP 1**, the site is located to the east of Bridgnorth, comprising several agricultural field parcels, with land falling to the east towards the A454. The site's western boundary is formed by Hermitage Hill Coppice which, as illustrated below in **Image EDP 2.1**.
- 2.2 The site itself is inherently visually and physically well contained in most areas due to a combination of undulating local topography and mature vegetation, with built adjacent the site to the east at Stanmore Industrial Estate and bounding the site at the Hobbins residential development. The site is further contained by the local road network, with the A458 forming the site's southern boundary and the A454 and Wolverhampton Road forming the northern boundary. As illustrated below, Hermitage Hill forms a local ridgeline which extends on a north-south axis along the eastern edge of Bridgnorth, providing screening for both the site and the settlement in local views.



Image EDP 2.1: In views from the A454, illustrating the local topography, regular field pattern and mature woodland containing the site.

- 2.3 The site itself comprises rectilinear, medium to large-scale agricultural fields (refer to **Image EDP 2.1**). As set out within the published landscape character assessments, and further illustrated within the supporting imagery below, a combination of local topography and mature tree cover result in limited views of the site from the north, west and south (**Images EDP 2.1** and **2.2**). The site benefits from the containment offered by Hermitage Hill Coppice to the west, Stanmore Country Park to the east and other surrounding woodland plantations to the north, south and further east, in addition to well-established

field boundaries that offer the basis for further reinforcement. However, where ground rises to the east, at High Grosvenor, glimpsed views are experienced by users of a rural land, although this is limited to occasional stretch of public footpath on the most elevated ground and where breaks in field boundary vegetation occur.



Image EDP 2.2: The site, seen here in the foreground, comprises arable fields, being enclosed by mature landscape features on all boundaries. Due to local topography and vegetation, views are enclosed by higher ground and well-wooded.

- 2.4 The site is bounded on all sides by mature vegetation, the more dense being the western boundary aligned with Hermitage Hill and eastern boundary comprising Stanmore Country Park. While the southern boundary is defined by the A458, mature woodland to the south contains views from the road and wraps around Stanmore Hall and the Touring Park.
- 2.5 Topographically, the site slopes from its western boundary with Hermitage Hill, at approximately 120m above Ordnance Datum (aOD), down to approximately 95m aOD at the A454 and 85-80m aOD at the Stanmore Industrial Estate and eastern boundaries.
- 2.6 There are three Public Right of Ways (PRoW) crossing through the site (illustrated on **Plan EDP 5**):
 - PRoW Ref. 0151/59/1 extends from the A458 on the southern boundary of the site to Brook Lane and the Stanmore Business Park;
 - PRoW Ref. 0151/68/1 extends from Brook Lane through Stanmore Business Park connecting to a bridleway route; and

- PRow Ref. 0151/70/1 extends from the A454 through the site to footpath 0151/38A/1 which runs along the western boundary through Hermitage Hill Coppice.

- 2.7 Views back to the site from publicly accessible locations are very limited by mature vegetation and tree cover within the local context. From a sensory perspective, the site is consistent with its surrounding context, being relatively unremarkable within the landscape, although Hermitage Hill Coppice the most visually sensitive part of the site and can be seen in elevated views from the east as providing some contribution to the wooded context. The Stanmore Industrial Estate and land adjacent to The Hobbins is well screened by the intervening landform, woodland and field boundary vegetation, partly owing to the lower lying ground and the proximity of Stanmore Country Park.
- 2.8 The site does not form a prominent or important part of the appreciation of the wider landscape and is seen as having limited interest, being barely perceptible in many views from within the wider surrounding context. Views of it are generally only perceived by receptors passing along the local road network and from public footpaths through and in close proximity to the site.



Image EDP 2.3: View from a public footpath adjacent to Hermitage Hill (within the site) looking east. The view illustrates the undulating and wooded character of the 'enclosed lowlands heath' character area.

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Section 3

Policy Review and Findings of EDP Data Trawl

- 3.1 An appreciation of the 'weight' to be attributed to any landscape or visual effects arising from development starts with an understanding of the planning context within which any such development is to be tested for its acceptability. As illustrated on **Plan EDP 1**, the site lies within SCC LPA administrative boundary.

Planning Policy Baseline

National Policy

- 3.2 The National Planning Policy Framework (NPPF) includes planning policies and guidance requiring developers to respond to the natural environment and landscape character, integrating the development into its local surroundings.
- 3.3 Section 12 of the NPPF addresses the issue of good design and recommends that planning decisions should aim to ensure that developments respond to the local character and history. Specifically, in paragraph 127 it is stated that development should *“add to the overall quality of the area..., are visually attractive as a result of good architecture, layout and appropriate and effective landscaping...”* and *“be sympathetic to local character and history, including the surrounding built environment and landscape setting...”*.
- 3.4 Section 15 of the NPPF addresses the natural environment. For landscape, this means *“recognising the intrinsic beauty of the countryside”* and balancing any 'harm' to the landscape resource with the benefits of the scheme in other respects. This balancing exercise is to be undertaken by the decision taker (in this case the LPA) and falls outside the remit of this report.

Local Policy

SCC Core Strategy Development Plan Development (Adopted February 2011) and SCC Site Allocations and Management of Development (Adopted December 2015)

- 3.5 The relevant planning policy at a local level is contained within the SCC's two key documents which make up the Shropshire Local Development Framework (LDF); titled the 'Core Strategy Development Plan Development' and the 'Site Allocations and Management of Development' which set out the Council's vision to 2026.
- 3.6 The relevant Core Policies referenced within the Core Strategy include Policy CS5: Countryside and Green Belt, Policy CS6: Sustainable Design and Development Principles and Policy CS17: Environmental Networks, as discussed further below.

Policy CS5: Countryside and Green Belt

- 3.7 The most important Strategic Policy is CS5: Countryside and the Green Belt. The policy requires new development to be controlled in accordance with national planning policy protecting the countryside and the Green Belt. The policy states (emphasis added):

“Subject to the further controls over development that apply to the Green Belt, development proposals on appropriate sites which maintain and enhance countryside vitality and character will be permitted where they improve the sustainability of rural communities by bringing local economic and community benefits.

Open market residential conversions will only be considered where respect for the heritage asset (as also required by Policy CS17) and high standards of sustainability are achieved; a contribution to infrastructure requirements is made in accordance with Policy CS9; and, except where the buildings are listed, a financial contribution for the provision of affordable housing to be delivered off site is provided in accordance with Policy CS11. In all cases, development proposals should be consistent with the requirements of Policies CS6 and CS17.”

- 3.8 The policy also sets out on page 66 that:

“Green Belt

Within the designated Green Belt in south-eastern Shropshire, there will be additional control of new development in line with government guidance in PPG2. Land within development boundaries in the settlements of Shifnal, Albrighton, Alveley, Beckbury, Claverley, and Worfield, and at the Alveley and Stanmore Industrial Estates is excluded from the Green Belt. Areas of safeguarded land are reserved for potential future development at Albrighton and Shifnal, while the military base and Royal Air Force Museum at Cosford is recognised as a major existing developed site within the Green Belt where limited defence related development will be permitted. The Green Belt boundary and all relevant policy areas are identified on the Proposals Map for the SAMDev DPD, which sets out the detailed approach to development in the Green Belt and any new site allocations required within the safeguarded land.”

Policy CS6: Sustainable Design and Development Principles

- 3.9 Policy CS6: Sustainable Design and Development Principles is in place to ensure developments are high quality, using sustainable design principles, to achieve an inclusive and accessible environment which respects and enhances local distinctiveness and which mitigates and adapts to climate change. Proposals should reflect published landscape character assessments, the Sustainable Design Supplementary Planning Document (SPD) and other guidance relating to the protection and conservation of landscape.

3.10 The policy text provides a number of design principles, stating that development should (emphasis added):

- *“Protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character, having regard to national and local design guidance, landscape character assessments and ecological strategies where appropriate;*
- *Contributes to the health and wellbeing of communities, including safeguarding residential and local amenity and the achievement of local standards for the provision and quality of open space, sport and recreational facilities; and*
- *Is designed to a high quality, consistent with national good practice standards, including appropriate landscaping and car parking provision and taking account of site characteristics such as land stability and ground contamination.”*

Policy CS17: Environmental Networks

3.11 Policy CS17: Environmental Networks aims to ensure that proposals identify, protect, enhance, expand and connect Shropshire’s environmental assets, to create a multifunctional network of natural and historic resources. Specifically, the policy requires proposals to:

- *“Protects and enhances the diversity, high quality and local character of Shropshire’s natural, built and historic environment, and does not adversely affect the visual, ecological, geological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors;*
- *Contributes to local distinctiveness, having regard to the quality of Shropshire’s environment, including landscape, biodiversity and heritage assets, such as the Shropshire Hills AONB, the Meres and Mosses and the World Heritage Sites at Pontcysyllte Aqueduct and Canal and Ironbridge Gorge;*
- *Does not have a significant adverse impact on Shropshire’s environmental assets and does not create barriers or sever links between dependant sites; and*
- *Secures financial contributions, in accordance with Policies CS8 and CS9, towards the creation of new, and improvement to existing, environmental sites and corridors, the removal of barriers between sites, and provision for long term management and maintenance. Sites and corridors are identified in the LDF evidence base and will be regularly monitored and updated.”*

3.12 The Site Allocations and Management of Development (SAMDev) Plan sets out proposals for the use of land and policies to guide future development for the plan period up to 2026. The SAMDev contains a number of policies relevant to the consideration of the site as a possible development site in landscape terms.

Policy MD6: Green Belt & Safeguarded Land

3.13 In the Green Belt the normal countryside Policies CS5 and MD7a and MD7b apply, with the Green Belt Policy MD6 providing an additional policy layer that reflects the extra protection afforded to Green Belts. Policy MD6 is consistent with, but does not repeat, the specific national policy on Green Belts that is set out in paragraphs 79 to 92 of the NPPF. Development proposed in the Green Belt must be able to demonstrate that it does not conflict with the purposes of the Green Belt. Further to these requirements the following development will be supported:

- “i. Limited infill development in identified Community Hubs or Clusters that accords with Policy MD3 and can demonstrate that it is sympathetic to the character of the settlement and the settlement policy, and in all other respects meets the policy tests set out in the Local Plan; and*
- ii. Development on previously developed sites, which would not have a greater impact on the openness of the Green Belt than the existing development, providing the development is for employment or economic uses, defence uses, local community use or affordable housing; and the development enhances the site and its contribution to the landscape setting.”*

Policy MD12: Natural Environment

3.14 Policy MD12 ensures avoidance of harm to Shropshire’s natural assets in accordance with Policies CS6, CS17 and the Natural Environment SPD. In relation to landscape character the policy states (emphasis added):

“Supporting proposals which contribute positively to the special characteristics and local distinctiveness of an area, particularly in the Shropshire Hills AONB, Nature Improvement Areas, Priority Areas for Action or areas and sites where development affects biodiversity or geodiversity interests at a landscape scale, including across administrative boundaries.”

Policy S3: Bridgnorth

3.15 Policy S3 makes provision for housing and employment development in Bridgnorth over the period of 2006-2026. Specifically:

“Around 1,400 dwellings and around 13 hectares of employment land with 6.6 hectares to relocate the existing Livestock Market, will be delivered in Bridgnorth on a mix of windfall and allocated sites. Land is allocated for housing and employment development as set out in Schedules S3.1a and S3.1b below and identified on the Policies Map.

Retail development will be directed to the town centre where it will benefit from, and contribute to, the town’s historic character. The Primary Shopping Frontage at High Street and Whitburn Street are protected for retail uses in accordance with Policies CS15 and MD10a and MD10b.

Existing employment land at Bridgnorth Aluminium campus, Faraday Drive, Stanmore Industrial Estate and Stanley Lane as shown on the Policies Map will be reserved for business and industrial uses. Development on these safeguarded employment sites will be for uses within classes B1, B2, B8 for offices, workshops, general industry or storage and distribution uses and appropriate sui generis uses.”

Supplementary Planning Documents

3.16 A number of other supplementary documents are relevant to landscape and visual matters, as summarised below:

- The Shropshire Landscape Typology (adopted September 2006);
- Sustainable Design (Part 1) SPD (adopted July 2011);
- Shropshire Landscape and Visual Sensitivity Study Assessment prepared by Gillespie (2018);
- The Shropshire Historic Landscape Character Assessment (June 2007);
- Shropshire Green Infrastructure Strategy prepared by LUC (July 2020);
- Shropshire Green Belt Assessment prepared by LUC (September 2017); and
- Shropshire Green Belt Review Stage 2 prepared by LUC (November 2018).

Relevant Designations and Considerations

3.17 **Plan EDP 3** shows the environmental planning context of the site with regard to landscape and visual issues, planning or landscape designations that may impose various levels of constraint on new development and contribute to an understanding of the extent to which the landscape is valued, including the following:

- The site is not located within a nationally designated landscape, the closest being the Shropshire Hills AONB which lies approximately 12km to the west of the site;
- The majority of the site is located within the West Midlands Green Belt however, Stanmore Business Park is ‘excluded’ from the Green Belt; it has an inset boundary drawn around it to exclude it. As such, not all the site falls within the Green Belt;
- Hermitage Hill Coppice, designated as Ancient Semi-natural Woodland and Ancient Replanted Woodland forms the site’s western boundary;
- A Scheduled Monument titled, ‘The Hermitage’ is located within the north-western part of the site. This designation is addressed in detail within the accompanying Archaeology and Heritage Statement (report ref: **edp5653_r008**);

- A Site of Special Scientific Interest (SSSI); 'Thatchers Wood and Westwood Covert' is located approximately 3km to the south-west of the site further details of which area contained in the Ecological Appraisal (report ref: **edp5653_r005**);
- Although there is public access through the site, there are relatively few routes in the wider network of PRow within the local context that have views of the site. Mature woodland cover serves to limit views from many PRow's although, given local topography some views from the east are possible;
- Davenport House (Grade II* listed) Registered Park and Garden (RPG) is situated approximately 1.7km to the north-east of the site. However, changes in landform restricts intervisibility with the site;
- There are no Listed Buildings within the site. The nearest being 'Stanmore Hall' Grade II listed, situated approximately 274m to the south-east and 'Swancote Farm House' Grade II listed located 280m to the north-east; and
- The site is not covered by any Conservation Area's (CA). There was not found to be any intervisibility between the site and the core of a conservation area, the nearest being the Bridgnorth CA approximately 630m to the west of the site.

3.18 While ecological and heritage designations are not landscape designations, they do on occasion serve to influence the value of the landscape, which is a consideration within this Landscape Appraisal, as advised by relevant sections of GLVIA. Where this is the case for the site, it is noted in the relevant discussion of landscape character.

Section 4

The Proposed Development

The Proposed Development

- 4.1 With reference to the revised proposals (see **Appendix EDP 1**), the scheme comprises the following:
- A reduced area of proposed development comprising residential and employment development;
 - Access is taken from the existing A454;
 - The proposed units are set back into the site from the western boundary, to enable the delivery of a 15m buffer to the Ancient Woodland;
 - The proposals include a robust landscape framework, contributing to the well-treed character with green corridors to break up the development mass and create multifunctional public open spaces; and
 - Existing trees and hedgerows are retained where possible and boundaries are reinforced with new native hedging where necessary.

Architectural Design Evolution

- 4.2 The revised layout acknowledged the importance of the site to the wider Green Infrastructure (GI) network, and allows for large areas of GI, supported by large landscape corridors, within the centre of the site and on an east-west axis through the site to provide a generous contribution to the wider aims of key strategic GI corridors.
- 4.3 In addition to embedding open space into the central areas of the site, new tree planting along the site boundaries has been implemented to contribute to the well-treed character of the local context, as well as providing some softening to local views from the east.

Designed, or Embedded, Mitigation

- 4.4 The following landscape and visual mitigation measures have been taken into account in the subsequent identification of environmental effects, where they are discussed in relation to the different receptors identified:
- Retain and enhance valuable landscape features within the site; largely those that contribute to the local landscape character;

- Additional tree planting within the site, particularly through green corridors, to reflect the well-treed nature of the surrounding context and filter views of built form;
- Set back development into the site from the western boundary, to enable the delivery of a 15m buffer to the Ancient Woodland; and
- Conserve and enhance the existing biodiversity on-site through the addition of new landscape features as described above.

Section 5 Landscape and Visual Appraisal

Introduction

- 5.1 The assessment of effects on landscape and visual amenity is aided through consideration of a series of viewpoints. The viewpoints have been selected to be representative of the visual sensitivities of the study area and publicly accessible locations in the general vicinity of the site from which clear views of the development may be obtained. The viewpoint locations are shown on **Plan EDP 6**.
- 5.2 As can be seen on **Plan EDP 6**, supported by **Photoviewpoints EDP 1 to 11**, in many areas around the site. views of the development would be either completely or partially screened by hedges, trees and buildings.
- 5.3 Representative viewpoints (or Photoviewpoints) are presented in **Table EDP 5.1**.

Table EDP 5.1: Selected Representative Viewpoints.

No.	Location	Grid Reference	Distance and Direction from Site	Reason for Selection
1	View from the A454 at the entrance to Stanmore Country Park looking south towards the A458	373843, 292696	192°; within the site	Road users on the A454
2	View from the A454 at the entrance to Stanmore Country Park looking north across the Site	373843, 292696	295°; within the site	Road users on the A454
3	View from footpath (Ref. 0151/70/1) looking south-east across the Site	372974, 292747	100°; within the site	Users of a public footpath
4	View from footpath (Ref. 0151/70/1) looking north across the Site	372974, 292747	355°; within the site	Users of a public footpath
5	View from footpath (Ref. 0151/70/1) looking south-east across the site	373196, 292903	110°; within the site	Users of a public footpath
6	View from A454 looking west across the Site	373145, 293467	270°; within the site	Road users on the A454
7	View from footpath (Ref. 0151/59/1) looking towards 'The Hobbins' residential area and the site	373606, 293785	183°; within the site	Users of a public footpath
8	View from BOAT (Ref. 0118/UN1/2) looking west towards the Site	376999, 293392	272°; 2.2km	Users of a public byway open for all traffic
9	View from a minor road leading to Roughton looking west towards the Site	375846, 293372	268°; 1.1km	Road users on a minor road

No.	Location	Grid Reference	Distance and Direction from Site	Reason for Selection
10	View from a minor road off A458 (opposite Old Lodge Farm) looking north-west towards the Site	376150, 291555	308°; 1.1km	Road users on a minor road
11	View from bridleway (Ref. 0151/72/1) looking north-west towards the Site	375055, 292027	293°; 1.8km	Users of a public bridleway

Technical Productions

- 5.4 To aid the assessment, a Zone of Theoretical Visibility (ZTV) diagram was produced as part of the process of defining the LVA study area. A site visit was then carried out on 23 March 2020 and on 20 August 2020 by a Chartered Landscape Architect from EDP’s Landscape team. Through this exercise the main visual receptors predicted to have actual visibility to the site were identified and the Zone of Primary Visibility (ZPV) was established, as illustrated on **Plan EDP 6**. The locations of the Photoviewpoints are also shown on **Plan EDP 6**, while the views themselves are shown in **Photoviewpoints EDP 1 to 11**.

Effects upon the Landscape Resource

- 5.5 Effects upon the landscape resource are concerned with those effects upon landscape fabric, landscape character and landscape designations at a national, regional or local level. For the proposed development at the site, and in response to the small scale of the proposals and planning policy, the following receptors have been identified as having the potential to experience effects:

- The landscape fabric, including trees, hedgerows and agricultural land in the immediate vicinity of the site; and
- The ‘Enclosed Lowland Heath’ Landscape Character Type (LCT).

Effects upon Landscape Character

- 5.6 At the National level, the character of England has been described and classified in the National Character Area (NCA) profiles published by Natural England² (NE). The site and its surroundings fall within NCA 66: Mid Severn Sandstone Plateau. While the NCA is broadly representative of the site’s landscape context, it is far too generic to reliably inform an assessment of the suitability of the proposals in landscape terms. Of much greater use are the more localised, county-specific assessments described below.

² <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

The Shropshire Landscape Typology (2006)

- 5.7 The most recent assessment of local landscape character was undertaken in 2006 as part of The Shropshire Landscape Typology published by Shropshire County Council. The assessment identifies 27 different LCT.
- 5.8 The site falls within the 'Enclosed Lowland Heath' LCT illustrated on **Plan EDP 4**. Also, crucially the site lies adjacent to the Wooded River Gorge LCT, which contributes to the wider well-wooded character and enclosed nature of some views, particularly to the north and south.
- 5.9 The Enclosed Lowland Heath is a gently rolling lowland landscapes that occur throughout northern and eastern Shropshire, in areas with predominantly sandy, impoverished soils. The relevant descriptions within the LCA include (inter alia):
- *“Undulating lowland;*
 - *Impoverished, freely draining soils;*
 - *Planned woodland character; and*
 - *Dispersed settlement pattern.”*
- 5.10 The assessment goes on to describe this LCT as typically comprising (my emphasis added):
- *“Enclosed Lowland Heaths are **gently rolling lowland topography** that occur throughout northern and eastern Shropshire...”. Bridgnorth is bordered and divided by the Severn Valley, which splits the town into High Town on the right bank and low town on the left. In the wider landscape landform is elevated to the south-west of Bridgnorth along the Jack Mytton Way, to the south-east at Gags Hill and Upper Farmcote and along Hermitage Hill falling away towards the A454;*
 - *“**Medium to large-scale agricultural landscape**, which has evolved from extensive areas of open heathland and ‘waste’ (common rough pasture).” Characteristically, there is a “**...pattern of rectilinear fields with thorn hedges, straight roads and scattered brick farmsteads.**”;*
 - Landscape fabric in the surrounding area comprises of: *“Regular plantation woodlands form the most significant woodland component. Hedgerow trees are generally fairly sparse, although in some places linear bands of trees along water courses also make an important contribution. This pattern of tree cover creates a **mixture of framed and lightly filtered views**”;*
 - Historically, the area to the east of Bridgnorth (comprising the site) once formed the core of the medieval royal forest of Morfe, although by the 14th century grazing pressures had significantly reduced the browse available for the king’s deer. By the

18th century there was enclosure of these areas which gave rise to the characteristic pattern of geometric fields, plantation woodland and straight enclosure roads;

- Intensive 20th century agriculture land use within the site, replaced traditional mixed farming practices results in the enlargement of many fields. However, arable prevails, with fields bisected by a hedgerow with regular trees; the site boundaries are relatively well vegetated (and should be retained and strengthened); and
- Visually, in the wider landscape the pattern of tree cover creates a mixture of framed and lightly filtered views.

5.11 The site is consistent with some of the broad characteristics noted within the character assessments above. It does not represent, in a perceptual or physical sense, a landscape of any great importance or character. It is therefore considered of compatible value to the majority of the local landscape, i.e. there is nothing to suggest the local landscape is worthy of any particular sensitivity or protection, apart from as an area of undeveloped and inaccessible land.

5.12 The assessment does not include any identified 'Actions' for the LCA and does not really take account of the need for development within green field sites, and do not, therefore, provide a great deal of landscape guidance in this respect

Shropshire Landscape and Visual Sensitivity Study (2018)

5.13 In relation to landscape sensitivity, SCC have produced the Shropshire Landscape and Visual Sensitivity Assessment (LVSS) Bridgnorth (May, 2018) defined as follows:

"The conclusions of this study when considered alongside the other information being gathered as part of the Strategic Land Availability Assessment (SLAA) will enable Shropshire Council to determine which areas warrant further planning appraisal and ultimately inform spatial development options for the Local Plan and provide a sound basis for decision making in the determination of planning applications. This is consistent with the National Planning Policy Framework (NPPF) which is clear that planning should recognise the 'intrinsic character and beauty of the countryside' and allocate land with the least environmental or amenity value."

5.14 The assessment provides a more detailed understanding of the local landscape whilst also linking back to the key landscape characteristics and valued attribute information provided in the published LCT, as discussed above.

5.15 The settlement of Bridgnorth has been divided into seven parcels for the purpose of the assessment. The site falls into parcel O2BDG-E (Parcel E) illustrated below at **Image EDP 5.1**.



Image EDP 5.1: Extract from the LVSS (2018) illustrating the extent of parcel 02BDG-E (shown in blue) in which the site is located.

- 5.16 Parcel E is described generally as located to the east of Bridgnorth: “A458 and A454 bisect the parcel and the area is further connected by minor and local roads and PRoW. The area is characterised by an upland plateau which extends into a rolling to flat topography and an area of increasing undulation to the north and east of distinctive drumlin formation. Hermitage Hill Coppice forms a distinctive western boundary connecting to well managed hedgerows and occasional hedgerow trees. Agriculture is a mixture of intensive arable and pasture with strongly regular field patterns.”
- 5.17 The study defines parcel 02BDG-E as having a ‘medium’ landscape character sensitivity and a ‘medium’ visual sensitivity to residential and employment development. In summarising the landscape character sensitivity, the report cites (my emphasis added):

“Landscape Sensitivity: Medium

*This is an intact farming landscape with a robust network of hedgerows and connections to outlying woodland. The parcel contains **pockets of residential and industrial development that could to accommodate adjacent development with appropriate planting to aid integration.** Overall the sensitivity of the landscape to change arising from new housing and employment is medium.”*

5.18 In summarising the visual sensitivity, the report states (my emphasis added):

“Visual Sensitivity: Medium

*This area has a typically rural character with a robust network of hedgerows and rolling landform, **benefitting from the scenic quality and screening properties of woodland in Stanmore Country Park** and in the adjacent parcel D. The relative number of people within this sensitivity parcel is high. The often **elevated and open aspect** means that some views experienced are of particular sensitivity to change, however **overall throughout the parcel, there is a medium sensitivity** to change arising from housing and employment.”*

5.19 The positive features of relevance to the site and its context include “*strongly defined hedgerow boundaries and distinct woodland blocks, leading into areas of well-defined undulations to the parcel boundaries*”.

5.20 The negative features of the character area of relevance to the site and its context include “*...this is a landscape of activity due to high frequency of road use*” and “*...settlement edges of The Hobbins are more abrupt...*”.

5.21 In visual terms, the assessment notes the following which illustrate the site containment:

- “*Views within this traditional farmland landscape, have no association with the Shropshire Hills AONB;*
- *The gently rolling landscape further limits views at lower levels;*
- *Development on this higher ground would be particularly noticeable;*
- *new development would be better screened at lower levels, than in a more open, elevated landscape; and*
- *The relative number of people likely to experience the view is concentrated along major roads, at The Hobbins where access and presence of receptors is constant and within the country park.”*

5.22 With reference to the site, and the LVSS it is apparent that it fulfils the criteria of being within a parcel that “*...contains pockets of residential and industrial development that could to accommodate adjacent development with appropriate planting to aid integration*” and as was borne out by the appraisal, could be brought forward without being visually intrusive development by locating development on the lower levels. On this basis, there is scope to develop the site in accordance with the sensitivity assessment as published.

5.23 The proposed development would be seen within the context of pockets of residential and industrial development and in close proximity the A454 and A458, being consistent with some of the features noted within the character assessments. The existing character of the site, in a perceptual or physical sense, would be changed to become residential

built context. However, key views to the Hermitage Hill ridge would be retained and the Ancient Woodland buffered.

- 5.24 The proposed development is relatively small in relation to the Enclosed Lowland Heath LCT and, due to local topography and the retention of the existing mature features at the site boundary, with the loss amounting to an area of arable land and few mature landscape features to facilitate access, would not have a material effect on the key elements of the landscape fabric. Although there will be localised excavation and slight alteration within the site, there would be retention of existing landscape features where possible and proposed new landscaping. Beyond the boundary features of the site, quiet enjoyment of the countryside would remain possible from PRow within the local context due to very little intervisibility with the proposed development.
- 5.25 It is also the case that in the wider landscape there are very few, publicly accessible locations where the change in usage of this area of landscape would be apparent. In this context, they would generally only be experienced by receptors within or immediately surrounding the site boundaries.

The Site Itself

- 5.26 Focusing on the site itself, a change of landscape character is inevitable following a change in land use, but it should not be seen as a detriment to the enjoyment and appreciation of the wider landscape. The site would be changed from an open agricultural field, requiring the loss of the internal farmland and its boundary features where access is required, to become a new 'Garden Village' settlement, adopting similar characteristics to those found within the site's immediate context.
- 5.27 Whilst there are some higher quality elements within the site, namely the mature landscape features at the site boundaries, the existing residential development at the Hobbins and proximity to the A454, A458 and Stanmore Industrial Estate, means perceptually the site is impacted by the adjacent built form and transport infrastructure.
- 5.28 In accordance with EDP's Landscape and Visual Assessment Methodology (provided at **Appendix EDP 2**) and the findings of the LVSS, the site is considered overall to be of medium sensitivity (this relates to the character of the site itself and also the near surroundings or context, i.e. the areas where landscape character effects are most likely) to residential and employment development.
- 5.29 Unsurprisingly, adverse effects within the site would largely relate to the 'perceptual and sensory' dimensions of landscape character. The gradual conversion of any 'greenfield' site to a development site would yield such an outcome and this is not a reflection on the quality of the proposals, but of the process which requires an assumption to be made that most people would see the perceptual and sensory change from greenfield to development as 'adverse'. On completion of the proposals, the magnitude of change to the character of the site and its context would be high, due to the addition of elements that may conflict with the characteristics of the site itself, but not necessarily its immediate setting owing to the nature of built form to the east.

- 5.30 In the long term, the magnitude of change to the site and its context would reduce to medium, due to the partial loss/alteration to one or more key receptors/characteristics and the addition of elements that are evident, but do not necessarily conflict with the key characteristics of the existing landscape. Given the reduced overall site area, the retention of existing boundary features and the maturation of new landscape proposals buffering the existing landscape elements, including some beneficial effects through the addition of new tree planting, the magnitude of change in the long term is likely to reduce to medium, yielding a **moderate/minor** adverse effect, particularly upon the perceptual and sensory characteristics, to the character of the site and its immediate context.
- 5.31 With regard to the ‘landscape fabric and habitats’ dimensions of landscape character, the existing landscape elements with the potential to be adversely impacted by the proposals include hedgerows and hedgerow trees, and the existing agricultural field parcel itself. The planting of new landscape features throughout the site, including some larger tree planting, would give rise to beneficial effects, enabling a further contribution to the well-treed context of the wider landscape. The valuable boundary hedgerows and trees would be retained, buffered, strengthened and better managed, with additional planting measures to mitigate against any loss due to access requirements. The magnitude of change to the landscape fabric of the site, in regard to the mitigation proposed, would be low, given the addition of elements not uncharacteristic within the existing landscape. Therefore, the effects on the landscape fabric of the site is assessed as **minor** and beneficial.
- 5.32 Importantly, the landscape of the site and its near surroundings are not designated at either a national or local level for landscape, which confirms the general reduced value and sensitivity in landscape terms, as described in detail above. This does not in turn indicate that development is acceptable in landscape terms, but that subject to addressing the appropriate detail of the scheme, there are no ‘in principle’ landscape constraints to development at the site.

Summary of Effects: Landscape Receptors

- 5.33 A summary of effects on landscape receptors is provided in **Table EDP 5.2**.

Table EDP 5.2: Summary of Long-term Landscape Effects.

Receptor	Sensitivity	Scale of Change	Nature of Effect	Overall Effect
Enclosed Lowland Heath LCT	Medium	Medium	Adverse	Moderate/Minor
The character of the site and its context	Medium	Medium	Adverse	Moderate/Minor
Landscape fabric of the site	Medium	Low	Beneficial	Minor

Effects on Visual Amenity

- 5.34 Visual effects relate to changes that arise in the composition of available views as a result of changes to the landscape, to people’s responses to the changes and to the overall effects with respect to visual amenity. Effects upon these receptors are derived

through the changes to the views experienced and through this the change to the overall visual amenity of the study area, as brought about by the proposals. Assuming a study area of 1km, the following receptors are considered within the assessment:

- Users of PRoW within the immediate vicinity of the site;
- Users of the surrounding road network; and
- Residents of properties aligning the A362.

General Visibility

5.35 As a consequence of intervening vegetation and local topography, it was found that only very limited intervisibility between the site and publicly accessible areas (visual receptors) was available, as represented by **Photoviewpoints EDP 1 to 11**. In most cases, it was found the receptors with views of the site are in close proximity, or immediately adjacent, to the site. However, receptors on high ground to the south of the site, illustrated in Photoviewpoint EDP 1, represent the only receptor group with medium distance views of the site. These Photoviewpoints do not represent the only areas from which there would be an effect, rather they provide a representative assessment, which is used as a benchmark to understand the wider potential effects as discussed below. The locations of the Photoviewpoints are shown on **Plan EDP 6**, while the Photoviewpoints are illustrated at **Photoviewpoints EDP 1 to 11** at the rear of this document.

Visual Effects

5.36 Based upon the views illustrated in **Photoviewpoints EDP 1 to 11**, this section provides a review of the potential visual effects that may arise from the proposals. Views of the site from publicly accessible viewpoints beyond 2-3km would in all instances be minimal, and in many cases barely perceptible.

Road Users (including Pedestrians)

5.37 Views from main road corridors in close proximity to the site include the A454 and A458, illustrated by **Photoviewpoint EDP 1, 2 and 6**. For the most part, the A454 is a well-treed busy vehicular corridor which provides access between Bridgnorth and Wolverhampton.

5.38 From at short section of the overall route, where the A454 passes adjacent to the site and where breaks in vegetation occur, open views into the site are possible. Whilst the site comprises of agricultural fields the immediate surrounding landscape is considered to be 'urban fringe' in character comprising A-roads, road signage, Stanmore Industrial Estate and existing residential properties. With a large area of the proposed built form occupying the lower lying landscape, receptors would only experience the development when in very close proximity and would still be set within the existing wooded context. As such, the magnitude of change for vehicle receptors to the east would be no greater than medium in both the short and long term, giving rise to a minor adverse effect on these low sensitivity receptors.

- 5.39 Users of main vehicular routes, including roadside pedestrians are likely to be travelling to a destination, work, shopping or entertainment centres, and not doing to take in the view so, in combination with a low susceptibility to the change proposed, their sensitivity is low.
- 5.40 The site is generally screened from views from minor roads in the surrounding rural landscape owing to the undulating local topography and mature intervening vegetation and woodland within Stanmore Country Park (refer to **Photoviewpoint EDP 10** and **11**). Transient, glimpsed views would be possible from minor roads in close proximity to the site during construction. On completion, the proposed development would be a barely perceptible element of transient views on minor roads, if seen at all on medium sensitivity minor road users.

PRoW Users

- 5.41 The greatest potential for effects on PRoW users is largely limited to a PRoW running through the site and along the western boundary of the site, through Hermitage Hill Coppice. As illustrated in **Photoviewpoint EDP 3, 4** and **5** from the lower lying ground (**Photoviewpoint EDP 5**) views are contained by woodland within Stanmore Country Park. From the higher ground views are more open, across the immediate farmland and illustrate the extensive nature of the wooded landscape.
- 5.42 The proposal would give rise to a high magnitude on this PRoW (**Photoviewpoint EDP 3**) change during the short-term. This represents the worst-case scenario and is experienced owing to the location 'within the site' where it is expected that there would be major alteration to key characteristics of the baseline. In the long-term, the proposed landscape strategy and mitigation planting will have matured providing some visual screening and softening the appearance of built form, integrating the development into the landscape.
- 5.43 In the wider landscape, there are surprisingly few PRoW with clear open views of the site. As shown in **Photoviewpoint EDP 8**, some glimpsed views of the elevated western boundary and Hermitage Hill ridge are possible from PRoW on elevated ground near Woundale hamlet and High Grosvenor Farm. The majority of the site is screened by woodland within Stanmore Country Park, however Hermitage Hill Coppice forms part of the mid-ground skyline with prominent hills in the background. Views of construction activities and proposed built form within the site, would be limited to very minor glimpsed views of taller elements within the scheme only. As such, on account of the change proposed, the change to the view would be minimal.
- 5.44 In views from the north and south, the site itself cannot be seen due to local topography and intervening woodland. The landscape is perceived as being mature and provides some visual screening to existing built form such as Stanmore Industrial Estate. Views of construction activities, if available at all, would be limited to very minor glimpsed views of taller elements within the scheme only. On completion, views of the site would be barely perceptible, if seen at all.

Private Receptors

- 5.45 A small number of residential properties with views into the site is limited to those at the Hobbins residential development, Swancote Farmhouse. From these properties, although field boundary vegetation at the edges of the site would provide some visual screening, short distance views would be possible, particularly from upper storey windows. At Stanmore Hall and the Caravan Park the enclosed nature of boundary treatments, appear to enclose views from ground level to the immediate property extents, the site is not considered to be visible from a main view from the house.
- 5.46 Owing to the areas of residential and industrial development in the immediate context, the change to the view resulting from the proposed development would not be considered out of character with the current baseline context. However, the proposed development would be considered to be clearly noticeable in these short-distance views although, residential visual amenity would not be fundamentally altered.

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Section 6 Discussion and Opinion

The Development Proposed

6.1 This report has reviewed the findings of a LVA of the revised proposals at Stanmore Village, Bridgnorth which represent a reduced overall site area. This report has assessed the likely landscape and visual effects arising from the development, and a number of key conclusions of which can be considered in two general respects, each of which is discussed in turn below, and as follows:

- In terms of the potential effects on the character of the landscape; and
- Effects on visual amenity, including views from local roads, footpaths and surrounding dwellings.

Summary of Landscape and Visual Effects

6.2 The landscape appraisal has considered the available published Landscape Character Assessments (at national and local scales), the Council's sensitivity assessment, EDP's own assessment of the character of the site and its landscape context, and a review of the landscape designations of a local, regional and national scale.

6.3 At the site level, whilst the effects would be high in the short-term due to the fundamental change of land use, they would be lessened due to the reduced overall site area but it is an important consideration that the changes being broadly in character with the neighbouring residential and industrial land uses (to the east).

6.4 At a local level effects are considered upon the Enclosed Lowland Heath LCT; the assessment finding that although there would be direct changes to the site at an elevated level, the wider LCA effects would be to a limited proportion of the character area, and the location and nature of the proposals with respect to the key characteristics of this character area and the existing and adjoining urbanised areas.

6.5 Potential visual effects have been considered upon a range of receptors local to the site, including users of local roads, cycle routes, footpaths, bridleways and those living in residential areas bordering the site to the east. The appraisal has been aided through the use of site visits and a range of assessment viewpoints as presented at **Photoviewpoints EDP 1-11.**

6.6 The assessment finds that visual effects at an elevated level are restricted to a very limited number of locations, and in very close proximity. It is only certain receptors on adjacent roads, residents with immediate views, and those using a sections of the PRow which passes through/or adjacent to the site, where elevated effects are likely.

- 6.7 Where effects are predicted along this PRoW, it needs to be borne in mind that in the wider context of the route taken between the existing urban area and the wider countryside, the change to the route will be experienced in an area already the subject of a transitional experience from an urban to rural character.

Conclusion

- 6.8 This Landscape and Visual Appraisal provides an appraisal of the landscape and visual matters relevant to the development of the site for the purposes of allocation within the Local Plan Review. It demonstrates that there will be no notable long-term effects as a result of the reduced scale of the proposals in combination with mitigation, and that the site could be accommodated into its context without elevated effects upon either the baseline landscape or visual resource, when considering in its broader context.
- 6.9 The proposals will result in some change and effect to receptors within a very close range (which is inevitable for any greenfield development location), but this change will be experienced within a location where residential and industrial development has desensitised these receptors, and a main road network provides some urbanised features contributing to an 'urban fringe' context which appreciably affects the baseline and thus level of effect.

Appendix EDP 1 Concept Masterplan

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Appendix EDP 2 Methodology: Thresholds and Definitions of Terminology used in this Appraisal

A2.1 Landscape and Visual Assessments are separate, though linked procedures. Landscape effects derive from changes in the physical landscape fabric which may give rise to changes in its character and how this is experienced. Visual effects relate to changes that arise in the composition of available views as a result of changes to the perception of the landscape, to people’s responses to the changes and to the overall effects with respect to visual amenity.

Table EDP A2.1: Defining the Sensitivity of The Landscape Baseline.

EDP assessment terminology and definitions	
Landscape Baseline - Overall Sensitivity	
Very High	<p>Value: Nationally/internationally designated/valued countryside and landscape features; strong/distinctive landscape characteristics; absence of landscape detractors.</p> <p>Susceptibility: Strong/distinctive landscape elements/aesthetic/perceptual aspects; absence of landscape detractors; landscape receptors in excellent condition. Landscapes with clear and widely recognised cultural value. Landscapes with a high level of tranquillity.</p>
High	<p>Value: Locally designated/valued countryside (e.g. Areas of High Landscape Value, Regional Scenic Areas) and landscape features; many distinctive landscape characteristics; very few landscape detractors.</p> <p>Susceptibility: Many distinctive landscape elements/aesthetic/perceptual aspects; very few landscape detractors; landscape receptors in good condition. The landscape has a low capacity for change as a result of potential changes to defining character.</p>
Medium	<p>Value: Undesignated countryside and landscape features; some distinctive landscape characteristics; few landscape detractors.</p> <p>Susceptibility: Some distinctive landscape elements/aesthetic/perceptual aspects; few landscape detractors; landscape receptors in fair condition. Landscape is able to accommodate some change as a result.</p>
Low	<p>Value: Undesignated countryside and landscape features; few distinctive landscape characteristics; presence of landscape detractors.</p> <p>Susceptibility: Few distinctive landscape elements/aesthetic/perceptual aspects; presence of landscape detractors; landscape receptors in poor condition. Landscape is able to accommodate large amounts of change without changing these characteristics fundamentally.</p>
Very Low	<p>Value: Undesignated countryside and landscape features; absence of distinctive landscape characteristics; despoiled/degraded by the presence of many landscape detractors.</p> <p>Susceptibility: Absence of distinctive landscape elements/aesthetic/perceptual aspects; presence of many landscape detractors; landscape receptors in very poor condition. As such landscape is able to accommodate considerable change.</p>

Table EDP A2.2: Defining the Sensitivity of The Visual Baseline.

Visual Baseline - Overall Sensitivity	
Very High	<p>Value/Susceptibility: View is: designed/has intentional association with surroundings; recorded in published material; from a publicly accessible heritage asset/designated/promoted viewpoint; nationally/internationally designated right of way; protected/recognised in planning policy designation.</p> <p>Examples: May include views from residential properties; National Trails; promoted holiday road routes; designated countryside/landscape features with public access; visitors to heritage assets of national importance; Open Access Land.</p>
High	<p>Value/Susceptibility: View of clear value but may not be formally recognised e.g. framed view of scenic value or destination/summit views; inferred that it may have value for local residents; locally promoted route or PRoW.</p> <p>Examples: May include from recreational locations where there is some appreciation of the visual context/landscape e.g. golf, fishing; themed rights of way with a local association; National Trust land; panoramic viewpoints marked on OS maps; road routes promoted in tourist guides and/or for their scenic value.</p>
Medium	<p>Value/Susceptibility: View is not widely promoted or recorded in published sources; may be typical of those experienced by an identified receptor; minor road routes through rural/scenic areas.</p> <p>Examples: May include people engaged in outdoor sport not especially influenced by an appreciation of the wider landscape e.g. pitch sports; views from minor road routes passing through rural or scenic areas.</p>
Low	<p>Value/Susceptibility: View of clearly lesser value than similar views from nearby visual receptors that may be more accessible.</p> <p>Examples: May include major road routes; rail routes; receptor is at a place of work but visual surroundings have limited relevance.</p>
Very Low	<p>Value/Susceptibility: View may be affected by many landscape detractors and unlikely to be valued.</p> <p>Examples: May include people at their place of work, indoor recreational or leisure facilities or other locations where views of the wider landscape have little or no importance.</p>

Magnitude of Change

A2.2 The magnitude of any landscape or visual change is determined through a range of considerations particular to each receptor. The three attributes considered in defining the magnitude are:

- Scale of Change;
- Geographical Extent; and
- Duration and reversibility/Proportion.

A2.3 **Table EDP A2.3** below provides an indication of the criteria by which the geographical extent of the area will be affected within this assessment.

Table EDP A2.3: Geographical Extent Criteria.

Landscape Receptors	Visual Receptor Criteria
Large scale effects influencing several landscape types or character areas	Direct views at close range with changes over a wide horizontal and vertical extent.
Effects at the scale of the landscape type or character areas within which the proposal lies	Direct or oblique views at close range with changes over a notable horizontal and/or vertical extent
Effects within the immediate landscape setting of the site	Direct or oblique views at medium range with a moderate horizontal and/or vertical extent of the view affected.
Effects at the site level (within the development site itself)	Oblique views at medium or long range with a small horizontal/vertical extent of the view affected.
Effects only experienced on parts of the site at a very localised level	Long range views with a negligible part of the view affected.

A2.4 The third, and final, factor, in determining the predicted magnitude of change is duration and reversibility. Duration and reversibility are separate but linked considerations. Duration is judged according to the defined terms set out below, whereas reversibility is a judgement about the prospects and practicality of the particular effect being reversed in, for example, a generation. The categories used in this assessment are set out in **Table EDP A2.4** below.

Table EDP A2.4: Factors Influencing Judgements on Magnitude of Change.

Duration	Reversibility
Long Term (20+ years)	Permanent with unlikely restoration to original state e.g. major road corridor, power station, urban extension, hydrocarbons
Medium to long term (10 to 20 years)	Permanent with possible conversion to original state e.g. agricultural buildings, retail units;
Medium term (5 to 10 years)	Partially reversible to a different state e.g. mineral workings;
Short term (1 – 5 years)	Reversible after decommissioning to a similar original state e.g. renewable energy development;
Temporary (less than 12 months)	Quickly reversible e.g. temporary structures.

Table EDP A2.5: Defining the Magnitude of Change to The Landscape and Visual Baseline.

Magnitude of Change	
(Considers Scale of Proposal/Geographical Extent/Duration and Reversibility/Proportion)	
Very High	<p>Landscape: Total loss/major alteration to key receptors/characteristics of the baseline; addition of elements that strongly conflict or integrate with the baseline.</p> <p>Visual: Substantial change to the baseline, forming a new, defining focus and having a defining influence on the view.</p>
High	<p>Landscape: Notable loss/alteration/addition to one or more key receptors/-characteristics of the baseline; or addition of prominent conflicting elements.</p> <p>Visual: Additions are clearly noticeable and part of the view would be fundamentally altered.</p>

Magnitude of Change	
Medium	Landscape: Partial loss/alteration to one or more key receptors/characteristics; addition of elements that are evident but do not necessarily conflict with the key characteristics of the existing landscape.
Low	Landscape: Minor loss or alteration to one or more key landscape receptors/-characteristics; additional elements may not be uncharacteristic within existing landscape.
	Visual: Proposed development will form a minor constituent of the view being partially visible or at sufficient distance to be a small component.
Very Low	Landscape: Barely discernible loss or alteration to key components; addition of elements not uncharacteristic within the existing landscape.
	Visual: Proposed development will form a barely noticeable component of the view, and the view whilst slightly altered would be similar to the baseline.
Imperceptible	<i>In some circumstances, changes at representative viewpoints or receptors will be lower than 'Very Low' and changes will be described as 'Imperceptible'. This will lead to negligible effects.</i>

Predicted Effects

A2.5 In order to consider the likely level of any effect, the sensitivity of each receptor is combined with the predicted magnitude of change to determine the level of effect, with reference also made to the geographical extent, duration and reversibility of the effect within the assessment. Having taken such a wide range of factors into account when assessing sensitivity and magnitude at each receptor, the level of effect can be derived by combining the sensitivity and magnitude in accordance with the matrix in **Table EDP A2.6**.

Table EDP A2.6: Determining the Predicted Levels of Effects to The Landscape and Visual Baseline.

Overall Sensitivity	Overall Magnitude of Change				
	Very High	High	Medium	Low	Very Low
Very High	Substantial	Major	Major/- Moderate	Moderate	Moderate/ Minor
High	Major	Major/ Moderate	Moderate	Moderate/ Minor	Minor
Medium	Major/ Moderate	Moderate	Moderate/- Minor	Minor	Minor/ Negligible
Low	Moderate	Moderate/ Minor	Minor	Minor/ Negligible	Negligible
Very Low	Moderate/ Minor	Minor	Minor/- Negligible	Negligible	Negligible/ None

Table EDP A2.7: Definition of Effects.

Definition of Effects	
Substantial	Effects that are in complete variance to the baseline landscape resource or visual amenity.
Major or Major/Moderate	Effects that result in noticeable alterations to much (<i>Major effect</i>) or some (<i>Moderate/Major effect</i>) of the key characteristics of the landscape resource or aspects of visual amenity.
Moderate	Effects that result in noticeable alterations to a few of the key characteristics of the baseline landscape resource or aspects of visual amenity.
Minor or Minor/Negligible	Effects that result in slight alterations to some (<i>Minor effect</i>) or a few (<i>Minor/Negligible</i>) of the key characteristics of the landscape resource or aspects of visual amenity.
Negligible or Negligible/None	Effects that result in barely perceptible alterations to a few (<i>Negligible effect</i>) or some (<i>Negligible/None effect</i>) of the key characteristics of the landscape resource or aspects of visual amenity.
None	No detectable alteration to the key characteristics of the landscape resource or aspects of visual amenity.

- A2.6 Effects can be adverse (negative), beneficial (positive) or neutral. The landscape effects will be considered against the landscape baseline, which includes published landscape strategies or policies if they exist. Changes involving the addition of large scale man-made objects are typically considered to be adverse, unless otherwise stated, as they are not usually actively promoted as part of published landscape strategies.
- A2.7 Visual effects are more subjective as peoples' perception of development varies through the spectrum of negative, neutral and positive attitudes. In the assessment of visual effects the assessor will exercise objective professional judgement in assessing the level of effects and, unless otherwise stated, will assume that all effects are adverse, thus representing the worst case scenario. Effects can be moderated by maturation of landscape strategies.
- A2.8 The timescale of each effect is also important and effects are generally assessed at time stamps in the whole development life cycle: temporary (at a mid-point in construction), short-term (completion at year 1), medium-term (typically 15 years), medium- to long-term (15+ years). In some cases, the operational phase of a scheme could be considered 'temporary'.

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Appendix EDP 3
Extracts from Shropshire Landscape and Visual Sensitivity Assessment
Bridgnorth (2018)

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Appendix 3

Bridgnorth Assessment

Part 1: Settlement Context

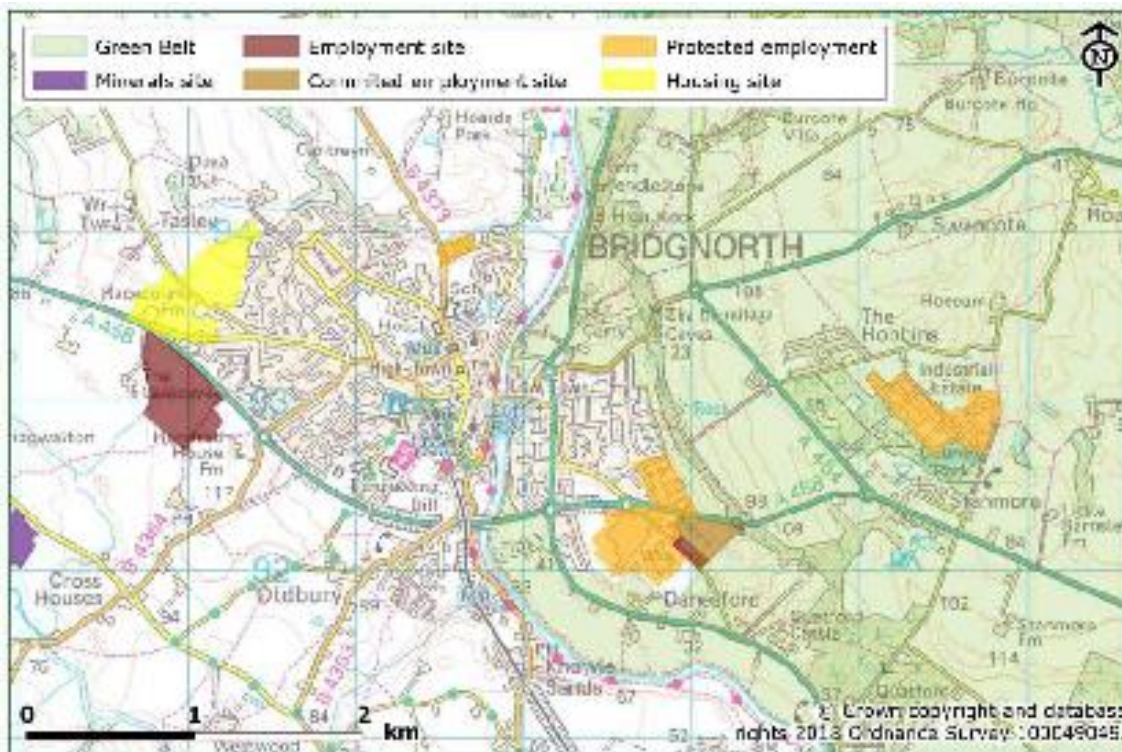


Figure A3.1 Bridgnorth Settlement Context

The town of Bridgnorth is on the western edge of the Shropshire Green Belt. The River Sever divides Bridgnorth, with part of the town, known as High Town, elevated above the River to the west and to the East of the River the area known as Low town. The eastern part of the town is nearly completely enclosed by Green Belt which continues along the eastern side of the River Sever to the North and South of the town.

The population of Bridgnorth is estimated to be around 13,030 persons living in approximately 6,189 dwellings¹. The historical growth of the town from its medieval origins continued through the industrial revolution, with further post war development including Council housing, and expansion with peripheral housing estates during the 1960's and 1970's. There have also been relatively large residential developments in Low Town during the 1990's utilising brownfield sites previously in industrial use and recent estate development to the West of the town in Tasley Parish. All this residential development is contained within constraints of a by-pass built during the 1980s to the south of the town. Bridgnorth itself retains its central medieval street pattern and many old buildings, which together with the topography, have resulted in a unique town with a distinctive character which has a large Conservation Area.

Bridgnorth, as the third largest town in Shropshire, acts as a key service centre not just for the town, but for a sizeable area of eastern Shropshire. Located at the junction of the A458 and the A442, it also accessible to Telford, Shrewsbury, Kidderminster, Wolverhampton and the Black Country. However, in part due to strong environmental constraints such as flood plain and topography there are now limited remaining infill opportunities within the built form, or more broadly within the Bridgnorth by-pass.

¹ Shropshire Council (2017), Hierarchy of Settlements

Shropshire Council has identified Bridgnorth as a proposed 'Principal Centre' settlement within its Preferred Scale and Distribution of Development consultation document (2017), (informed by its Hierarchy of Settlements Assessment²), as it offers significant employment opportunities and provides a range of services and facilities which serve the settlement's resident communities and surrounding rural hinterlands. Principal centres comprise the larger market towns within Shropshire settlements and are considered to present the best opportunities to deliver high levels of growth outside Shrewsbury³.

Shropshire Council's Preferred Scale and Distribution of Development consultation document (2017)⁴, proposes an 'urban focus' for development, with around 24.5% of the total growth in Shropshire in the period to 2036 to occur in the five 'Principal Centres' which include Bridgnorth. As the second largest principal centre in Shropshire, it is expected that Bridgnorth will contribute towards the strategic growth objectives in the east of the County.

The Preferred Scale and Distribution of Development consultation document (2017) proposes that in Bridgnorth around 1,500 homes and a minimum of 16ha of employment land should be delivered in the period up to 2036, including at sites already allocated outside the Green Belt. Taking into account existing planning permissions, allocations and other approvals, there is a need to identify sites for around a further 912 dwellings as well as the employment land required to deliver net floorspace requirements.

The previous consultation identified that, notwithstanding the preferred level of employment growth, the location of Bridgnorth and other strategic objectives may drive a need for additional employment land. This potential was highlighted by the Inspectors Report on the Examination into the SAMDev Plan (2015)⁵ which indicates that 'to accommodate the long-term future of the town, it is necessary to open up new areas'. Green Belt constraints (including the lack of any identified safeguarded land for development) and the role of Green Belt review to consider opportunities to support the balanced and sustainable growth of the town are recognised. Key concerns for Bridgnorth include the need to provide more affordable housing and to achieve a better balance between housing and employment by stimulating additional local employment opportunities. Thus the need and scope for Green Belt release to provide for future development to the east of Bridgnorth will need to be considered as part of Local Plan Review.

Bridgnorth benefits from an existing Town Plan⁶ (endorsed December 2011) which identifies key issues and recommended actions for a range of topic areas.

² Shropshire Council (2017), Hierarchy of Settlements

³ Shropshire Council (2017), Preferred Scale and Distribution of Development consultation document

⁴ Shropshire Council (2017), Preferred Scale and Distribution of Development consultation document

⁵ The Planning Inspectorate (2014), Shropshire Council Site Allocations and Management of Development Local Plan, Inspector's Report

⁶ Bridgnorth Town Plan (2011) Available at: bridgnorthtownplan.com

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

The map and aerial show the location and extent of all the parcels around Bridgnorth that were considered in the Stage 1 Green Belt Assessment (2017) (outlined purple and blue on Figures A3.2 and A3.3). The parcels outlined in purple are those around Bridgnorth that are being considered in further detail as part of the assessment of harm. This assesses the harm to the Green Belt as a consequence of releasing land for development.

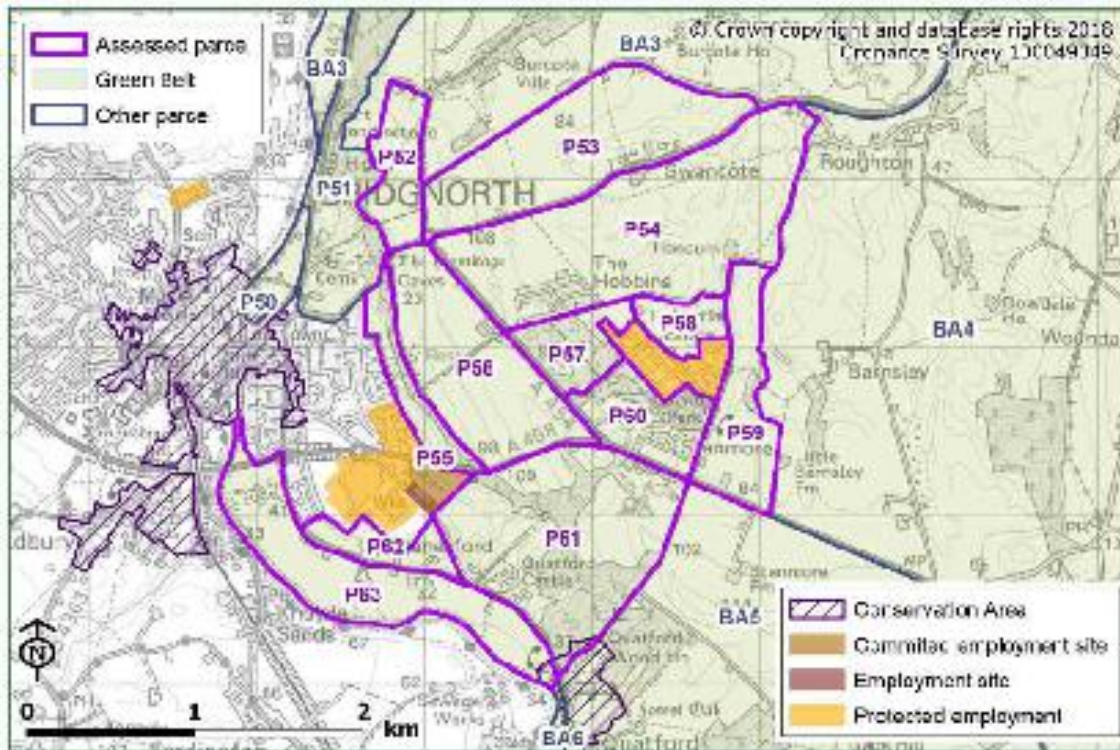


Figure A3.2: Green Belt Parcels Surrounding Bridgnorth



Figure A3.3: Aerial view of Green Belt Parcels Surrounding Bridgnorth

Parcel P52

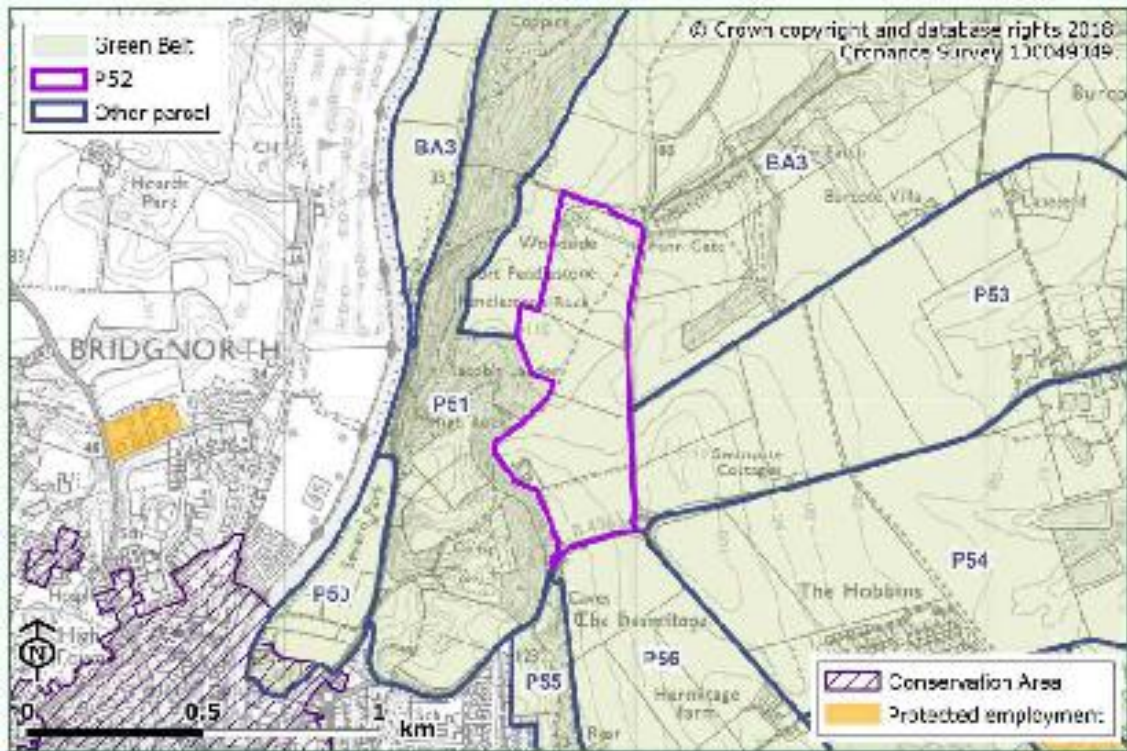


Figure A3.4: Parcel P52



Figure A3.5: Rolling farmland sloping eastwards within parcel P52, the ancient woodland of Hermitage Hill Coppice seen in the background: view west from the eastern boundary of the parcel

Relationship to settlement/countryside

Parcel P52 comprises undulating agricultural land adjacent the east of the 'High Rock/Pendlestone Rock/Jacobs Ladder escarpment' and 'Hermitage Hill Coppice' ancient woodland. These visually and physically separate the parcel from the urban area of Bridgnorth to the west. The parcel is bound to the north by a farm access track, to the east by a rural lane and to the south by the B4363, beyond which lies agricultural land with the parcel forming part of a wide area of open countryside set to the east of Bridgnorth.

The conclusions on the contribution of parcel P52 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below. No sub-parcels within P52 were identified that would have a lower level of harm.

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

No Contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Telford both of which are considered towns with regard to Purpose 2. However, these settlements are over 10km apart from each other. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between the settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is little sense of encroachment due to the area being almost entirely free of development. The only built development includes farm buildings which are not considered to be urbanising influences. Adjacent land uses include fields and woodland. The B4363 / A454 roundabout (with street lights) lies adjacent to the south-east and exerts a slight sense of urban encroachment on the parcel. However the land parcel contains characteristics of countryside and is open. The Green Belt parcel is playing a strong role preventing encroachment of the countryside.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, this parcel is screened by from view by the distinctive wooded ridge of Jacob's Ladder and Pendlestone Rock, located within an adjacent parcel. The openness of the land does not play an important role in the immediate setting of this historic settlement, but does contribute to preserving the wider rural setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The southern section of the western boundary of the parcel is defined by a band of ancient woodland which is a strong and readily recognisable boundary. The southern boundary is defined by the B4365 and the eastern and northern boundaries are defined by a farm access track and rural lane. These alternative Green Belt boundaries are readily recognisable and clearly defined physical features but are not strong boundaries. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land), any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary. The release of P52 in isolation from the release of P50 and P51 would not create a coherent Green Belt boundary.

Harm to Green Belt Resulting from Release

This parcel is open, comprising agricultural landcover. The only development present within the parcel are farm buildings which accord with the NPPF's appropriate uses of Green Belt land. Releasing this parcel from the Green Belt would lead to a significant level of encroachment on the countryside and weaken the contribution of neighbouring areas with regard to Purpose 3. It is considered that the release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

Parcel P53

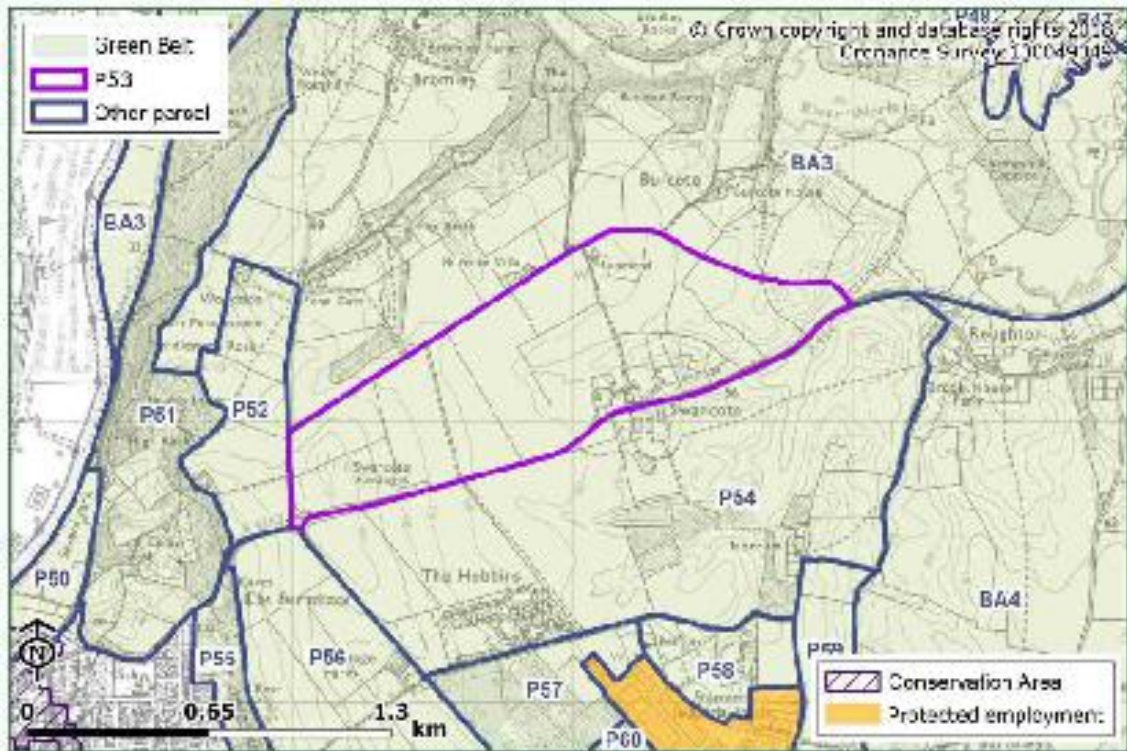


Figure A3.6: Parcel P53



Figure A3.7: Open farmland within parcel P53, view east from public footpath off the A454

Relationship to settlement/countryside

Parcel P53 comprises undulating and gently sloping agricultural land to the east of the 'High Rock /Jacobs Ladder escarpment' and 'Hermitage Hill Coppice' ancient woodland. These, along with parcel P52, visually and physically separate the parcel from the urban areas of Bridgnorth to the west. The parcel is bound to the south by the A454 and to the north, east and west by country lanes. The parcel contains a limited amount of built development, including the Swancote Health and Leisure Centre, however this has little urbanising influence and the parcel remains predominately open and forms part of the wider countryside to the east of Bridgnorth.

The conclusions on the contribution of parcel P53 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below. No sub-parcels within P53 were identified that would have a lower level of harm.

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

No Contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is a limited sense of encroachment within the parcel as a result of the Swancote Health and Leisure Centre located along the southern boundary. Additionally, the B4363 / A454 roundabout (with street lights) is located in the southwest of the parcel and exerts a limited sense of urban encroachment. However the land parcel remains open, contains strong characteristics of countryside and is rural in character. It is considered to be playing a strong role in safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The southern boundary of the parcel is defined by the A454 and the northern, eastern and western boundaries of the parcel are defined by country lanes. These are readily recognisable and clearly defined physical features. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land) any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary in association with any neighbouring areas of land proposed for release.

Harm to Green Belt Resulting from Release

This parcel is open and predominantly comprises agricultural landcover. The only built development present within the parcel includes a small number of detached houses and the relatively small Swancote Health and Leisure Centre. Releasing this parcel from the Green Belt would lead to a significant level of encroachment on the countryside and would weaken the role neighbouring areas contribute to Purpose 3. It is considered that the release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

Parcel P54

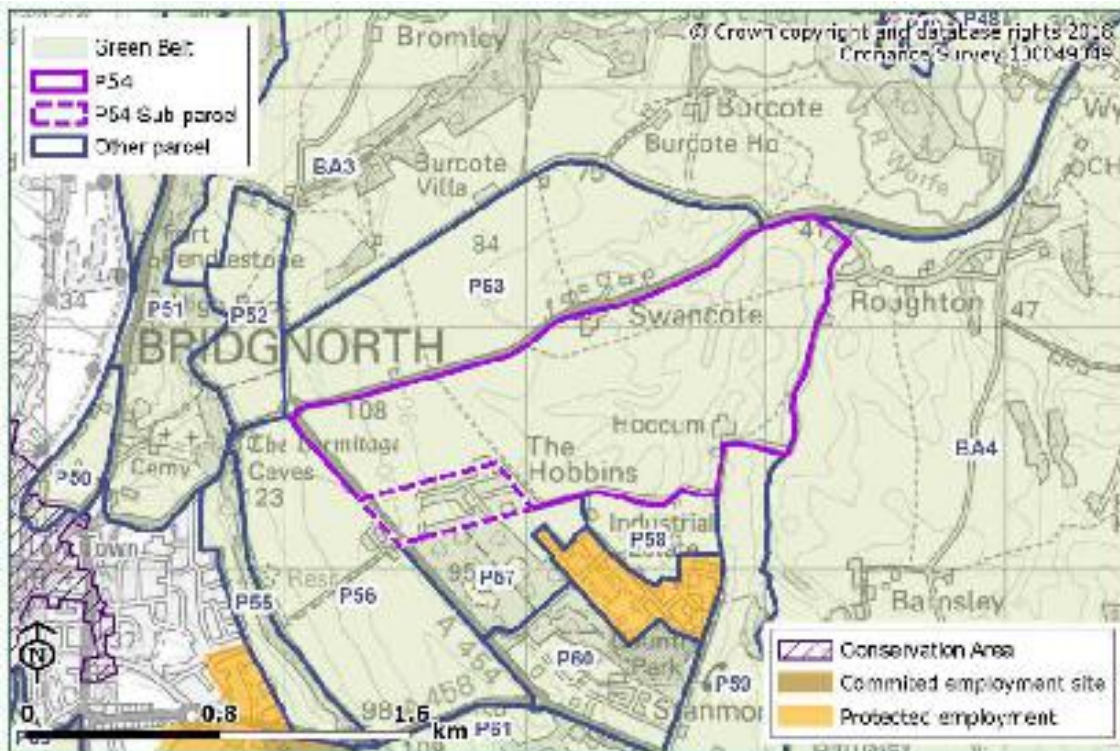


Figure A3.8: Parcel P54



Figure A3.9: Small field to the west of The Hobbins forming sub-parcel P54, view southwest from the north-western edge of The Hobbins.

Relationship to settlement/countryside

Parcel P54 comprises undulating agricultural land to the east of Bridgnorth. Intervening rising land and the 'Hermitage Hill Coppice' ancient woodland, located to the west of the parcel, visually and physically separate it from the urban areas of Bridgnorth. The parcel is bound to the north and west by the A454 and to the south and east by country lanes. A block of residential properties (The Hobbins) is located in the southwest of the parcel and woodland within Stanmore Country Park and Stanmore Industrial Estate are located in neighbouring land to the southwest of the parcel, whilst these are an urbanising influence they provide a degree of separation between the parcel and the wider countryside to the south. The southwest corner of the parcel is enclosed by The Hobbins and woodland within Stanmore Country Park and does not have a strong relationship with wider countryside that surrounds.

The conclusions about the performance of Parcel P54 are set out in the descriptions below. This includes the identification of a sub-parcel within Parcel P54 (delineated on Figure A3.8 in a purple hatch line) which the assessment concludes would have a lower level of harm associated with its release.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Albrighton both of which are considered towns with regard to Purpose 2. However, these settlements are over 13km apart from each other. The parcel also lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between the settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as a result of the hamlets of Hoccum, The Hobbins and part of the hamlet of Swancote which are located within the parcel. However the parcel displays the characteristics of the countryside and is open. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

The south-western corner of this parcel comprises a block of residential properties (The Hobbins) and a small pastoral field that lies adjacent to the west (contained on three sides by settlement, woodland and a road which provide a degree of separation between it and the wider parcel). This area (including the Hobbins) is considered to be playing a weaker role against Purpose 3.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The A454 defines the northern and western edges and rural lanes define the southern and western edges of the parcel. These features would form readily recognisable alternative Green Belt boundaries, but are not particularly strong. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land) any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary in association with any neighbouring areas of land proposed for release.

Harm to Green Belt Resulting from Release

Although this parcel contains a block of residential development, it is open, predominantly comprises agricultural land, and is strongly associated with the wider countryside to the east of Bridgnorth. Releasing this large parcel from the Green Belt would lead to a significant level of encroachment on the countryside and a weakening of the contribution of neighbouring land to Purpose 3. It is considered that the release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

A sub-parcel has been identified within Parcel P54 that would lead to a lower level of overall harm to the Green Belt if it was to be released. Sub-parcel P54 comprises a block of residential development (The Hobbins) and a small field to the west. This sub-parcel does not have a strong connection to the wider countryside. Releasing this sub-parcel from the Green Belt would have a limited sense of encroachment on the countryside and would not affect the integrity of neighbouring Green Belt land. It is considered that the release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P55

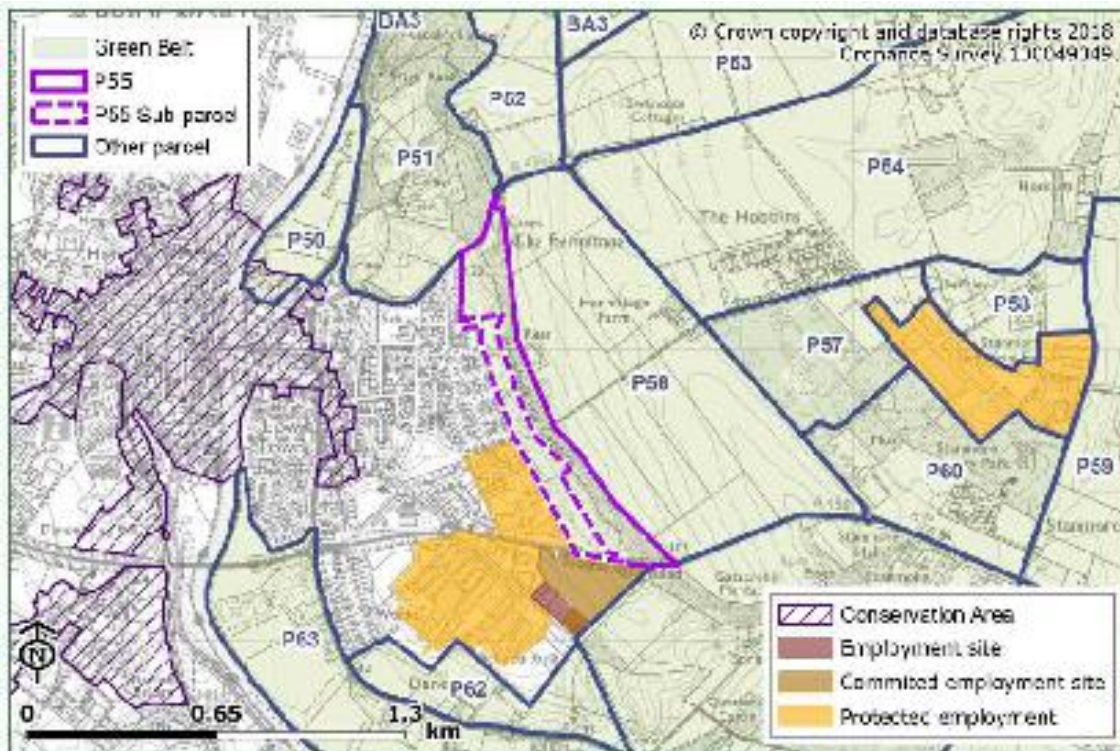


Figure A3.10: Parcel P55



Figure A3.11: Steep western sloping farmland within sub-parcel P55, view southwest from the edge of Hermitage Hill Coppice.

Relationship to settlement/countryside

The western and southern edge of the parcel adjoins the urban edge of Bridgnorth. The northern edge is bound by the B4363 with woodland beyond. The eastern side of the parcel comprises the ancient woodland of 'Hermitage Hill Coppice' which provides a strong degree of separation between the west of the parcel and the wider countryside to the east. The western side of the parcel is more closely associated with the urban area of Bridgnorth than the countryside.

The conclusions about the performance of Parcel P56 are set out in the descriptions below. This includes the identification of a sub-parcel within Parcel P56 (delineated on Figure A3.10 in a purple hatch line) which the assessment concludes would have a lower level of harm associated with its release.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Albrighton both of which are considered towns with regard to Purpose 2. However, these settlements are over 13km apart from each other and the parcel makes no contribution to preventing the merging or erosion of the visual or physical gap between them. The parcel also lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

It is also acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate/The Hobbins. Stanmore Industrial Estate/The Hobbins is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Weak

There is a strong sense of encroachment within this parcel as a result of the settlement edge of Bridgnorth, which includes large industrial buildings. The parcel comprises small pastoral fields and mature woodland, and contains no urban development. It displays some of the characteristics of the countryside, but is on the urban fringe and lacks a strong rural character. The Green Belt plays a weak role safeguarding the countryside from encroachment.

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

Strong

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, the distinctive wooded ridgeline of Hermitage Hill Coppice, located within the parcel, has excellent visibility with large areas of this historic settlement. The openness of the land plays a key role in the immediate setting of Bridgnorth and is considered to contribute positively to its historic significance and special character.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The existing settlement edge on the western boundary of the parcel does not constitute a strong Green Belt boundary. A new Green Belt boundary to the west of 'Hermitage Hill Coppice' designated ancient woodland would represent a stronger and alternative Green Belt boundary.

Harm to Green Belt Resulting from Release

This parcel is undeveloped, however the settlement edge of Bridgnorth exerts a sense of urban encroachment across the western part of the parcel. The ancient woodland band on the elevated ridge within the eastern part of the parcel plays a key role in separating the west from the wider countryside to the east. The release of the eastern part of the parcel would lead to encroachment on the countryside to the east and a weakening of the neighbouring area of Green Belt land. Additionally, this distinctive wooded ridgeline plays an important role in the immediate setting of the historic area of Bridgnorth. Releasing the whole of Parcel P55 would significantly compromise the role this Green Belt land is playing with regard to Purpose 4. The release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

A sub-parcel has been identified within Parcel P55 that would lead to a lower level of overall harm to the Green Belt if it was released. Sub-parcel P55 comprises the western part of the parcel, which includes sloping pastoral fields that rise to the east towards the woodland. The settlement edge of Bridgnorth exerts a strong sense of encroachment within the sub-parcel. The openness of the land within the sub-parcel does not play a key role in the setting of the historic settlement area located within Bridgnorth, as it is largely out of sight. Releasing Sub-parcel P55 would not significantly compromise the role this Green Belt land is playing with regard to Purpose 4 and, due to the presence of the wooded ridgeline to the east, would not lead to a sense of encroachment on neighbouring areas of open Green Belt land. Releasing Sub-parcel P55 from the Green Belt would lead to a **Low-Moderate** level of harm to the Green Belt in this local area.

Parcel P56

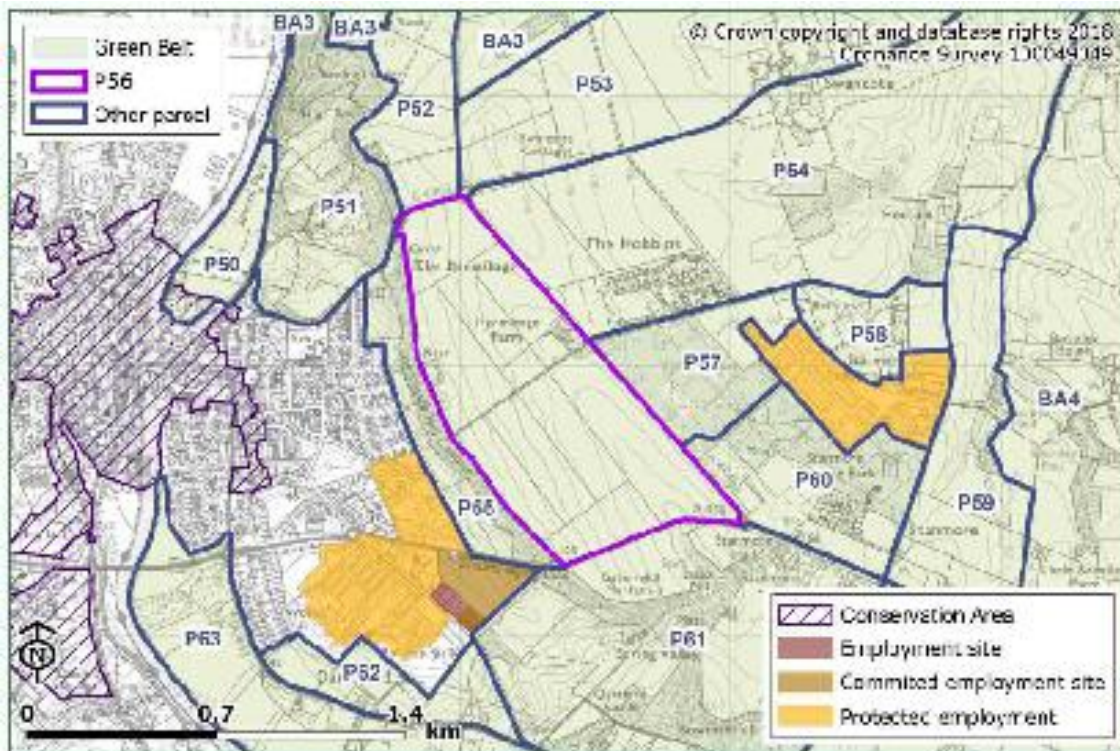


Figure A3.12: Parcel P56



Figure A3.13: Open farmland within Parcel P56 sloping down to east, view northeast from a public footpath along western edge of the parcel.

Relationship to settlement/countryside

Parcel P56 comprises sloping agricultural land located to the east of Bridgnorth. 'Hermitage Hill Coppice' ancient woodland is located along the western boundary of the parcel and visually and physically separates it from the urban area of Bridgnorth. The parcel is open and contains no built development apart from Hermitage Farm which is an 'appropriate use' of land within the Green Belt. The parcel is bounded to the north and northeast by the B4363 and A454 respectively which provide little separation between the parcel and the neighbouring areas of agricultural land. Woodland within Stanmore Country Park and the Stanmore Industrial Estate are located in neighbouring land to the southeast of the parcel and provide a degree of separation from the wider countryside to the east. However, despite this separation, the parcel forms part of a wide area of open countryside set to the east of Bridgnorth.

The conclusions about the performance of Parcel P36 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is located close to the settlement of Bridgnorth. It does lie between the settlements of Bridgnorth and Albrighton both of which are considered towns with regard to Purpose 2. However, these settlements are over 13km apart from each other and the parcel makes very little contribution to preventing the merging or erosion of physical gap between them. The parcel also lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

It is also acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate/The Hobbins. Stanmore Industrial Estate /The Hobbins is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is little sense of encroachment due to the area being almost entirely free of development. The only built development includes farm buildings which are not considered to be urbanising influences. The B4363 / A454 roundabout (with street lights) lies adjacent to the north-east and exerts a slight sense of urban encroachment on the parcel. However, the land parcel contains strong characteristics of countryside, has no urbanising development, and is open. The Green Belt parcel is playing a strong role preventing encroachment of the countryside.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, this parcel is screened by from view by the distinctive wooded ridgeline of Hermitage Hill Coppice, located within the adjacent parcel. The openness of the land does not play an important role in the immediate setting of this historic settlement, but contributes to preserving the wider rural setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The ancient woodland band along the western edge of the parcel would form a strong and durable boundary feature. Roads along the northern, southern and eastern edges of the parcel would form readily recognisable and clearly defined Green Belt boundaries but would not constitute strong boundary features. There are no stronger alternative boundary features. As the parcel does not lie adjacent to any settlement edge (or non-Green Belt land), any alternative Green Belt boundary would need to be defined taking into account the coherence of a new boundary in association with any neighbouring areas of land proposed for release.

Harm to Green Belt Resulting from Release

Parcel P56 is open in character and undeveloped, comprising agricultural landcover. Releasing this parcel from the Green Belt would lead to encroachment on the countryside and a weakening of the neighbouring areas of Green Belt land with regard to Purpose 3. The parcel is partially contained to the west and southeast by the Stanmore Industrial Estate and Stanmore Country Park which would reduce the sense of encroachment on the wider countryside and level of harm to the Green Belt. Nevertheless, due to the open and sloping landform within the parcel, releasing this parcel from the Green Belt would lead to a **Moderate-High** level of harm to the Green Belt in this local area.

Parcel P57

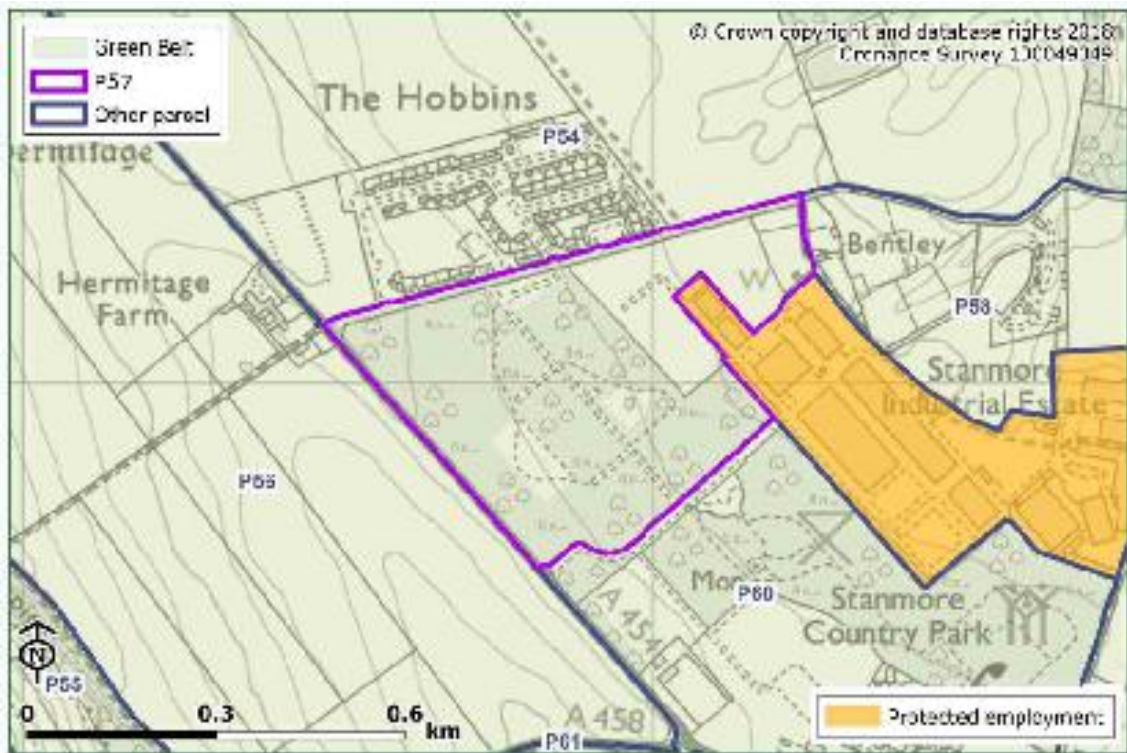


Figure A3.14: Parcel P57



Figure A3.15: Woodland within Stanmore Country Park in parcel P57, view east from the western edge of parcel P56

Relationship to settlement/countryside

Parcel P57 is located adjacent to the northwest of Stanmore Industrial Estate and is bound to the southwest by the A454 and the north and south by minor roads. In addition, a block of residential properties (The Hobbins) are located adjacent to the north of the parcel, and woodland within Stanmore Country Park adjoins the southeast of the parcel. These features provide a degree of containment of the parcel from the surrounding wider countryside. However due to the presence of woodland there is a limited sense of urban encroachment within the parcel.

The conclusions about the performance of Parcel P57 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 750m east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between the settlements. Loss of openness would not be perceived as reducing the gap between these settlements.

It is also acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate. Stanmore Industrial Estate is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

The parcel comprises Stanmore Country Park. There is very little sense of encroachment despite being bordered to the north by the hamlet of The Hobbins and to the east by Stanmore Industrial Estate due to the woodland within the parcel which limits visibility. The parcel itself is entirely free of development, however the A454 runs along the western boundary. The Green Belt plays a strong role safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads surrounding the parcel would form a more consistent and readily recognisable alternative Green Belt boundary than the existing urban edge of Stanmore Industrial Estate which is inset in the Green Belt.

Harm to Green Belt Resulting from Release

Parcel P57 contains no built development and is open in character with an abundance of woodland. The parcel is contained by development to the north (the Hobbins) and the east (Stanmore Industrial Estate). Its containment by development provides separation from the wider countryside to the north and east. Releasing this parcel from the Green Belt would lead to encroachment on the countryside within the parcel itself, but its relative containment by existing development would minimise harm to the wider Green Belt. The roads surrounding the parcel would also form a more consistent and readily recognisable alternative Green Belt boundary than the existing urban edge of Stanmore Industrial Estate. The release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P58

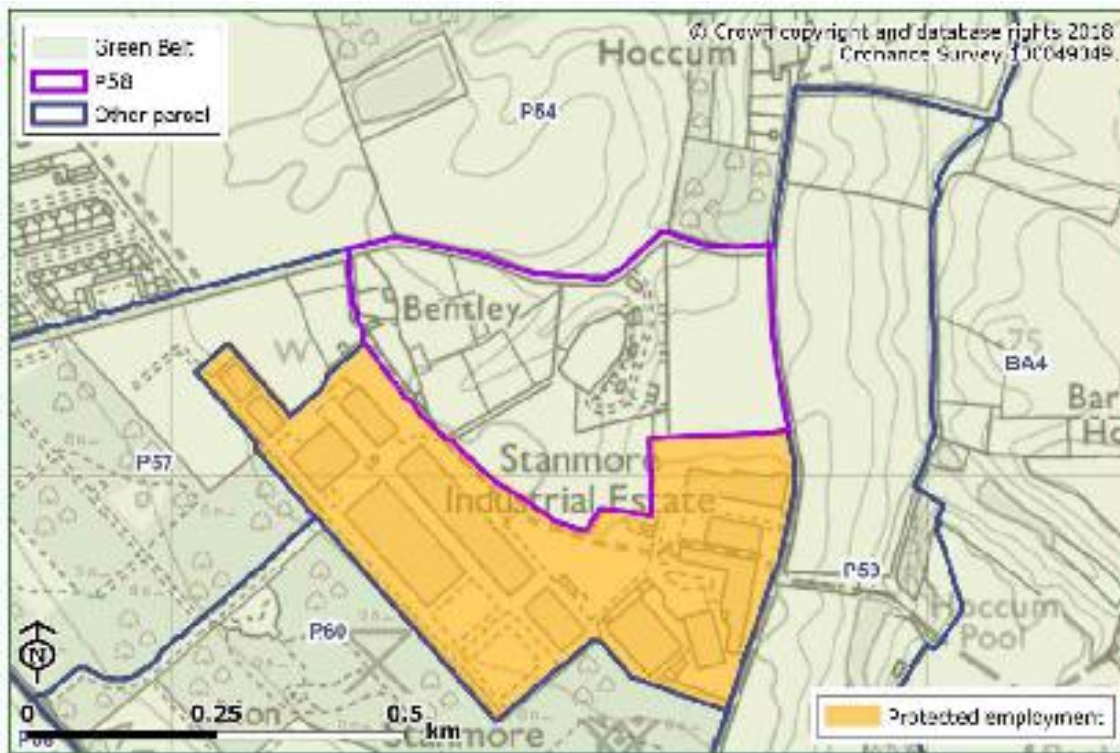


Figure A3.16: Parcel P58



Figure A3.17: Horse paddocks within parcel P58, view southeast from northern edge of the parcel, with Stanmore Industrial Estate in the background.

Relationship to settlement/countryside

Parcel P58 is located adjacent to the north of Stanmore Industrial Estate, which is located to the south of the parcel. This area encompassing Stanmore Industrial Estate is largely developed with modern industrial buildings and associated service areas and is inset within the Green Belt. The northern and north-eastern edges of the parcel are bound by country lanes, and a block of woodland adjoins the northeast of the parcel. The east of the parcel is bound by hedgerows and a plantation of young deciduous trees. These features provide minimal separation between the parcel and the wider countryside to the north and east. Although partly contained by development, the parcel is open and forms part of the wider countryside.

The conclusions about the performance of Parcel P58 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 1.5km east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as it is bordered to the south and southwest by the Stanmore Industrial Estate. Additionally, a cluster of houses are located to the northwest of the parcel, including a large single dwelling with swimming pool and tennis court. The land parcel contains agricultural fields, paddocks and lines of trees; it has characteristics of countryside and is generally open. However, neighbouring development has reduced the sense of openness in parts and weakened its rural character. The Green Belt designation within this parcel plays a moderate role safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The road along the northern and boundary of the parcel would form a more consistent and readily recognisable Green Belt boundary than the existing urban edge of Stanmore Industrial Estate. The eastern edge of the parcel is bound by hedgerows and farm track which does not constitute a strong boundary.

Harm to Green Belt Resulting from Release

The southern and western part of Parcel P58 is contained by the adjacent Stanmore Industrial Estate which exerts a sense of encroachment within parts of the parcel. Land within the parcel contains agricultural fields, paddocks and lines of trees and is open constituting part of the wider countryside to the northeast of Stanmore industrial Estate. Releasing this parcel from the Green Belt could lead to encroachment on the countryside within the parcel itself but its relative containment would limit the harm to the wider Green Belt. Due to the containment by existing development to the south and west the release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P59

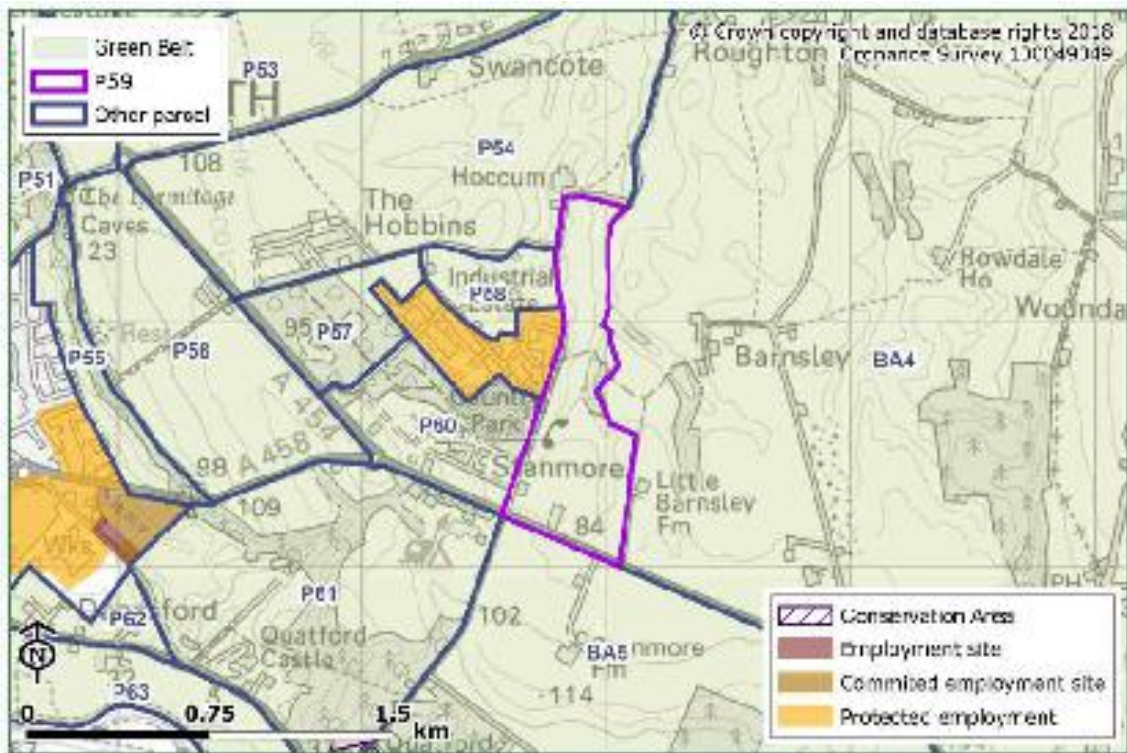


Figure A3.18: Parcel P59



Figure A3.19: Rolling farmland within parcel P59, view southeast from the northern edge of the parcel.

Relationship to settlement/countryside

Part of the western edge of parcel P59 adjoins Stanmore Industrial Estate which is inset in the Green Belt and exerts a level of urban encroachment in the parcel. However this is limited with the parcel comprising open rolling agricultural land which is strongly associated with the wider countryside to the east.

The conclusions about the performance of Parcel P59 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 1.5km east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Strong

There is some sense of encroachment within the parcel as a result of the Stanmore Industrial Estate which lies adjacent to part of the western border of the parcel. A garden centre is also located within the south of the parcel (this is considered to be an urbanising influence) and a couple of dwellings. However the land parcel contains the characteristics of countryside, and is open. The Green Belt plays a strong role safeguarding the countryside from encroachment.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the north and south of the parcel and the woodland block to the east of the parcel would form readily recognisable Green Belt boundaries. However, the majority of the parcel is bound by hedgerows and tracks, which would not form durable boundaries any stronger than the existing urban edge of Stanmore Industrial Estate.

Harm to Green Belt Resulting from Release

There is a limited sense of existing encroachment within parts of the parcel as a result of the adjacent Stanmore Industrial Estate. However, the parcel is open, comprising agricultural land and has a strong connection with the wider countryside. Releasing this parcel from the Green Belt would lead to significant encroachment on the countryside and a weakening of the contribution neighbouring areas of Green Belt make to Purpose 3. The release of this parcel from the Green Belt would lead to a **High** level of harm to the Green Belt in this local area.

Parcel P60

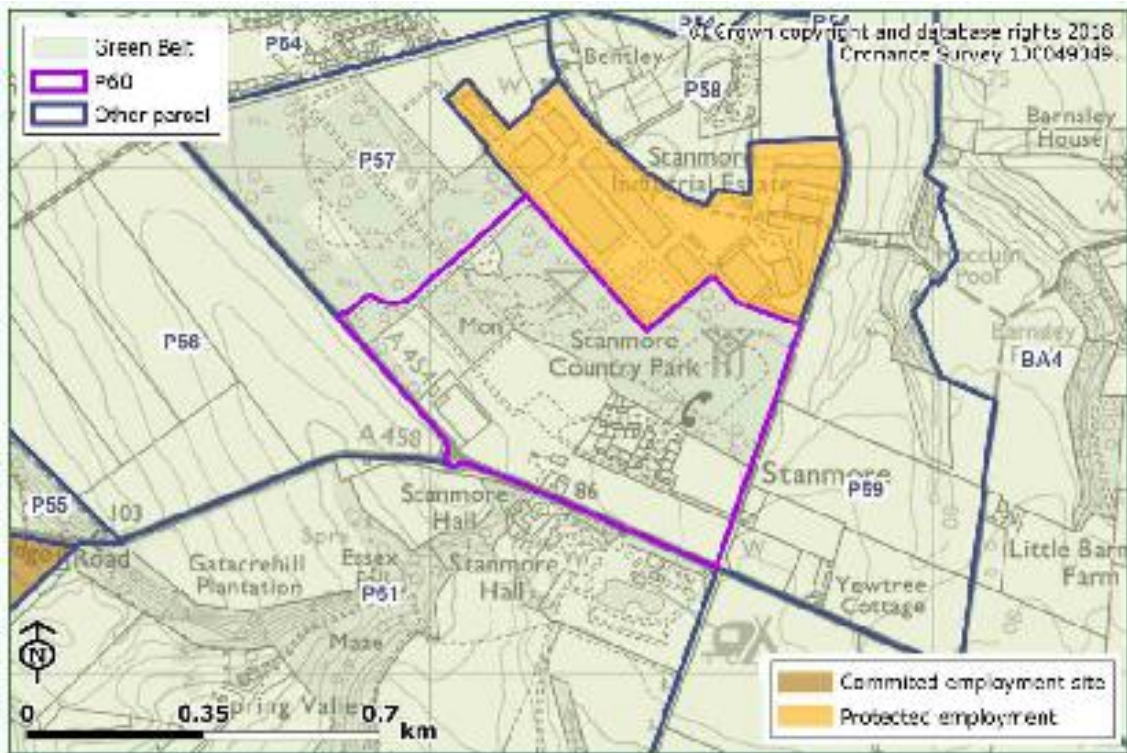


Figure A3.20: Parcel P60



Figure A3.21: Horse paddock along the eastern edge of P60, view east from the eastern edge of Russell Close.

Relationship to settlement/countryside

Parcel P60 is located adjacent to the south of Stanmore Industrial Estate which is inset in the Green Belt. Woodland within Stanmore County Park is located in the north of the parcel and a plant nursery is located in the southwest. The west of the parcel also contains the small hamlet of Stanmore which consists of a housing estate of military origin. The parcel is bound by the A458 to the south, the A454 to the southwest, and a minor access road to the northwest. The industrial estate to the north, and Stanmore Hall caravan park, set within mature woodland to the south, provide a degree of containment and separate the parcel from the wider countryside to the north and south. On balance the parcel has a closer association with development located within it and existing development to the north and south, than the wider countryside.

The conclusions about the performance of Parcel P60 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

The parcel is located approximately 700m east of the settlement of Bridgnorth and adjacent to the Stanmore Industrial Estate. The parcel lies between the settlements of Bridgnorth and Wombourne/Wolverhampton/Dudley. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements. Loss of openness would not be perceived as reducing the gap between settlements.

It is acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate. Stanmore Industrial Estate is not however a town considered under Purpose 2 of this assessment.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as it is bordered to the north by the Stanmore Industrial Estate. However, much of the parcel is sheltered from this by a thick band of woodland along the northern half of the parcel. In addition, the parcel contains the hamlet of Stanmore, a cluster of houses to the northeast of the parcel and a garden centre to the south. The remaining areas are wooded or in agricultural use. Overall the land parcel does contain the characteristics of countryside and is relatively open. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

The south-eastern corner of this parcel comprises the small hamlet of Stanmore, as well as a small pastoral field and horse paddock. The small pastoral field and horse paddock are contained by Stanmore and woodland to the north and woodland that encloses Stanmore Caravan Park to the south. This provides a degree of separation between it and the wider parcel. This area is considered to be playing a weaker role against Purpose 3.

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

No Contribution

Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the south and northwest of the parcel would form alternative Green Belt boundaries that are more readily recognisable and stronger than the existing urban edge of Stanmore Industrial Estate. The east of the parcel is defined by a minor access road, hedgerows and a woodland edge with no potential stronger alternative Green Belt boundaries.

Harm to Green Belt Resulting from Release

Parcel P60 contains residential development and is contained by development to the north and south. Much of the parcel comprises woodland and agricultural land and is relatively open. Releasing this parcel from the Green Belt would lead to some encroachment on the countryside. However its containment to the north and south and extent of existing development within the parcel mean the release of this parcel from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Parcel P61

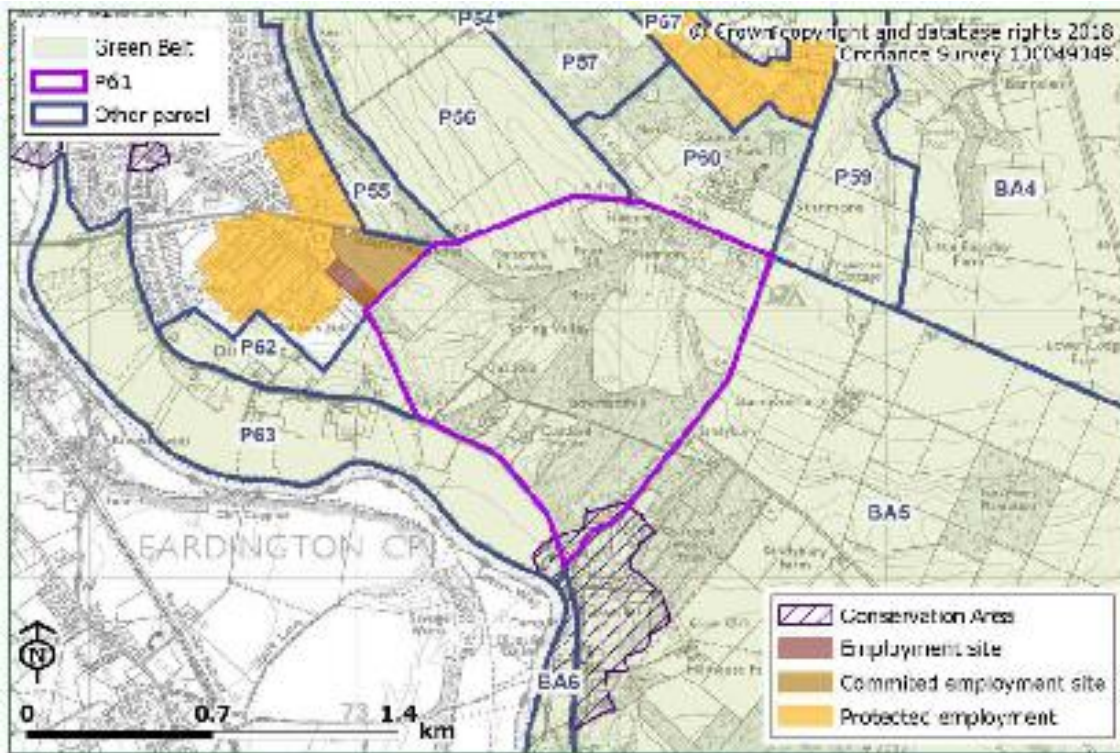


Figure A3.22: Parcel P61



Figure A3.23: Rolling farmland and woodland within parcel P61, view west.

Relationship to settlement/countryside

Parcel P61 adjoins the southeast of the urban area of Bridgnorth and comprises land which slopes down to the west forming part of the eastern valley side of the River Severn. The landcover is predominantly agricultural land and mature woodland some of which is designated as ancient woodland. Stanmore Hall Caravan Park is located in the northeast of the parcel. Large industrial buildings on the fringe of Bridgnorth overlook parts of the parcel and provide a sense of encroachment along the western edge of the parcel. The north of the parcel is bounded by the A458, the south of the parcel is bounded by the A442 and a minor road, and the east of the parcel is bounded by a country lane. Quatford Wood House Woodland also adjoins the southeast of the parcel. The parcel is largely undeveloped and open and on balance is more closely associated with the wider countryside to the east, than the urban area of Bridgnorth.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Stourbridge with the West Midlands conurbation beyond. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is some sense of encroachment within the parcel as a result of the presence of Stanmore Hall Caravan Park to the north of the parcel and a few clusters of houses surrounded by Quatford Castle in the south of the parcel. Additionally, large industrial buildings (Bridgnorth Aluminium) within the urban area of Low Town (Bridgnorth), adjacent to the west, are visually prominent from the steep land in the far west of the parcel. However, these urbanising influences are limited with the parcel remaining relatively open and display many of the characteristics of the countryside. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, the elevated land in the east of this parcel has some intervisibility with the historic settlement areas within Bridgnorth, however this is relatively limited. The openness of the land and its rural character do not play an important role in the immediate setting of this historic settlement, but contribute to preserving the wider rural setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the parcel would form readily recognisable Green Belt boundaries and would form stronger boundaries than the current urban edge along the industrial sites to the west.

Harm to Green Belt Resulting from Release

Parcel P61 contains some development, including a caravan park in the northeast of the parcel and a few clusters of houses and Quatford Castle in the south of the parcel. Large industrial buildings within the urban area of Bridgnorth are also visible in the far west of the parcel. These features exert a slight sense of urban encroachment within parts of the parcel; however the majority of the parcel is open and comprises rolling agricultural land and woodland (some designated as ancient woodland). Releasing this parcel from the Green Belt would lead to significant encroachment on a large area of countryside and a weakening of neighbouring Green Belt land in relation to Purpose 3. The release of this parcel from the Green Belt would lead to a **Moderate - High** level of harm to the Green Belt in this local area.

Parcel P62

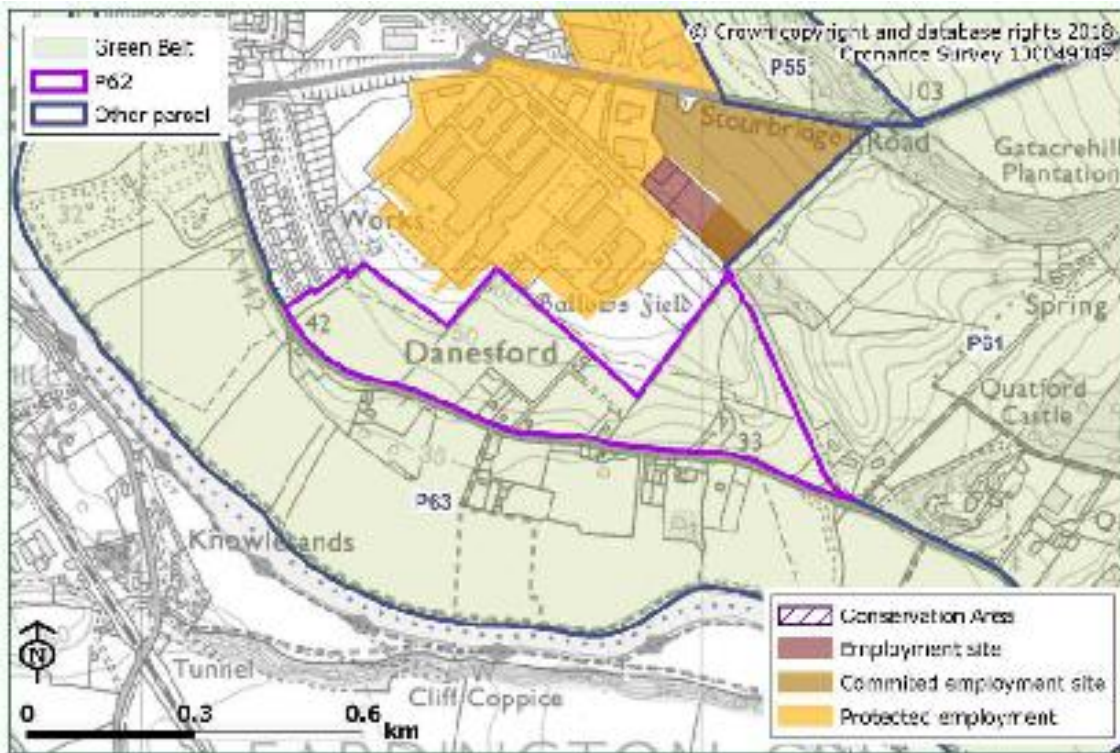


Figure A3.24: Parcel P62



Figure A3.25: View of parcel P62 looking north from the A442.

Relationship to settlement/countryside

Parcel P62 is located on the southern eastern edge of Bridgnorth and comprises sloping agricultural land and part of the hamlet of Danesford. The parcel adjoins agricultural land to the south and west, however the A442 to the south and slope of the land with woodland to the west, separate the parcel from the wider countryside. The adjoining industrial and residential development to the north and west has a substantial urbanising influence on the character of the parcel. The parcel has a closer association with the settlement edge than the wider countryside.

The conclusions about the performance of Parcel P62 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Highley which are considered under Purpose 2 in this assessment. However, these settlements are over 7km apart from each other. The parcel also lies between the settlements of Bridgnorth and Stourbridge & Kidderminster. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is a sense of encroachment within the parcel as a result of the visual prominence of the settlement edge of Low Town (Bridgnorth) and the large buildings located within an industrial estate adjacent to the northern border (Bridgnorth Aluminium). Additionally, part of the hamlet of Danesford is contained within the south of the parcel and the busy A442 runs along the southern border. The parcel contains a mix of small arable and pastoral fields, it displays some characteristics of the countryside and is relatively open, however it lacks rural character. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

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

Weak

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, the undulating land within this parcel has very little intervisibility with the historic settlement areas within Bridgnorth. The openness of the land does not play an important role in the immediate setting of this historic settlement, but contributes marginally to preserving the wider setting.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The roads bounding the parcel to the south and east would constitute a more consistent and readily recognisable Green Belt boundary than the existing urban edge along the industrial sites to the north.

Harm to Green Belt Resulting from Release

The visually prominent residential and industrial buildings adjoining the parcel have a strong influence on the parcel. The parcel is predominantly open and contains a mix of small arable, pastoral fields and residential properties forming part of the hamlet of Danesford. Releasing this parcel from the Green Belt would lead to some encroachment on the countryside. However the roads bounding the parcel to the south and east would constitute a more consistent and readily recognisable Green Belt boundary than the existing urban edge along the industrial sites to the north and the parcels containment by development to the north, and to a more limited extent to the south by further properties in Danesford mean the release of this parcel from the Green Belt would lead to a **Low-Moderate** level of harm to the Green Belt in this local area.

Parcel P63

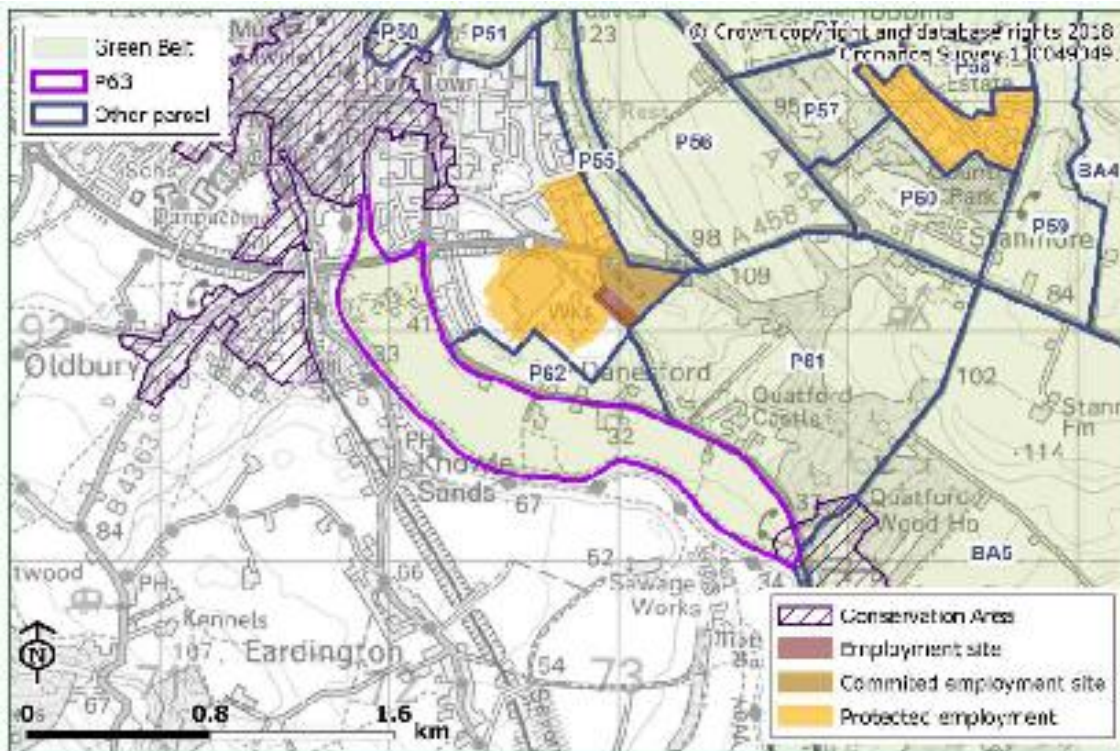


Figure A3.26: Parcel P63



Figure A3.27: Flat floodplain within parcel P63 with Caravan Park seen in the background, view north from the western edge of the parcel.

Relationship to settlement/countryside

Parcel P63 adjoins the southern edge of Bridgnorth and consists predominantly of agricultural land forming part of the River Severn floodplain. Part of the hamlet of Danesford and the Riverside Caravan Park are also contained within the parcel. The parcel is bounded along the western and southern edges by the River Severn, to the north by the settlement edge and to the east by the A442. These provide containment of the parcel from the surrounding countryside. The north of the parcel is crossed by the A458. The parcel is however predominantly agricultural land and has a closer association with the surrounding countryside than the built up area.

The conclusions about the performance of Parcel P63 are set out in the descriptions below. No sub-parcels were identified that would have a lower level of harm.

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

No contribution

This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.

Purpose 2 - To prevent neighbouring towns merging into one another

Weak

This parcel is adjacent to the settlement of Bridgnorth. The parcel lies between the settlements of Bridgnorth and Highley which are considered under Purpose 2 in this assessment. However, these settlements are over 7km apart from each other. The parcel also lies between the settlements of Bridgnorth and Stourbridge/Kidderminster. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements.

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Moderate

There is a sense of encroachment within the parcel as a result of the visual prominence of settlement edge of Low Town (Bridgnorth) which includes large industrial buildings (Bridgnorth Aluminium) located adjacent to the north-eastern border, the A442 that defines part of the north eastern border, and the A458 (Bridgnorth bypass) and River Severn Bridge passes through the north of the parcel. Additionally, part of the hamlet of Danesford and The Riverside Caravan Park are contained within the parcel. However, despite these urbanising influences the parcel remains largely open comprising relatively large flat arable and pastoral fields, residential garden grounds and small paddocks. The parcel displays characteristics of the countryside and is generally rural in character, although this character is weaker in places, especially in the north. The Green Belt plays a moderate role safeguarding the countryside from encroachment.

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

Strong

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement area located within Bridgnorth. In practice, land within the far north of the parcel that forms a flat river terrace of Severn and has good intervisibility with the historic settlement areas within Bridgnorth. The openness of this land plays an important role in the immediate setting of Bridgnorth Conservation Area and contributes positively to the historic significance of the settlement.

The Riverside Caravan Park and adjoining small pastoral field to the south have a reduced sense of openness and are largely screened from the Bridgnorth Conservation Area by the A458 (Bridgnorth bypass) River Severn Bridge. This area is considered to play a weaker role against purpose 4.

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Alternative Green Belt Boundaries

The existing Green Belt boundary comprises the River Severn to the south of the parcel and the existing settlement edge of Bridgnorth to the north. Release of parcel P63 would lead to the creation of a new Green Belt boundary along the A442, which whilst readily recognisable would not constitute as strong a Green Belt boundary as the River Severn.

Harm to Green Belt Resulting from Release

Parcel P63 contains a limited amount of built development, including the A458 and caravan park in the north of the parcel and part of the hamlet of Danesford in the south of the parcel. However, the parcel is open and predominantly comprises agricultural land. The land in the far north of the parcel contributes to the setting of the historic areas within Bridgnorth, although the caravan park in the north of the parcel limits this. Releasing this parcel from the Green Belt would have some impact on the setting of the historic town and lead to encroachment on the countryside. It is considered that the release of this parcel from the Green Belt would lead to a **Moderate-High** level of harm to the Green Belt in this local area.

Conclusion

Figure A3.28 below shows the level of harm associated with the release of parcels/sub-parcels considered within the assessment around Bridgnorth.

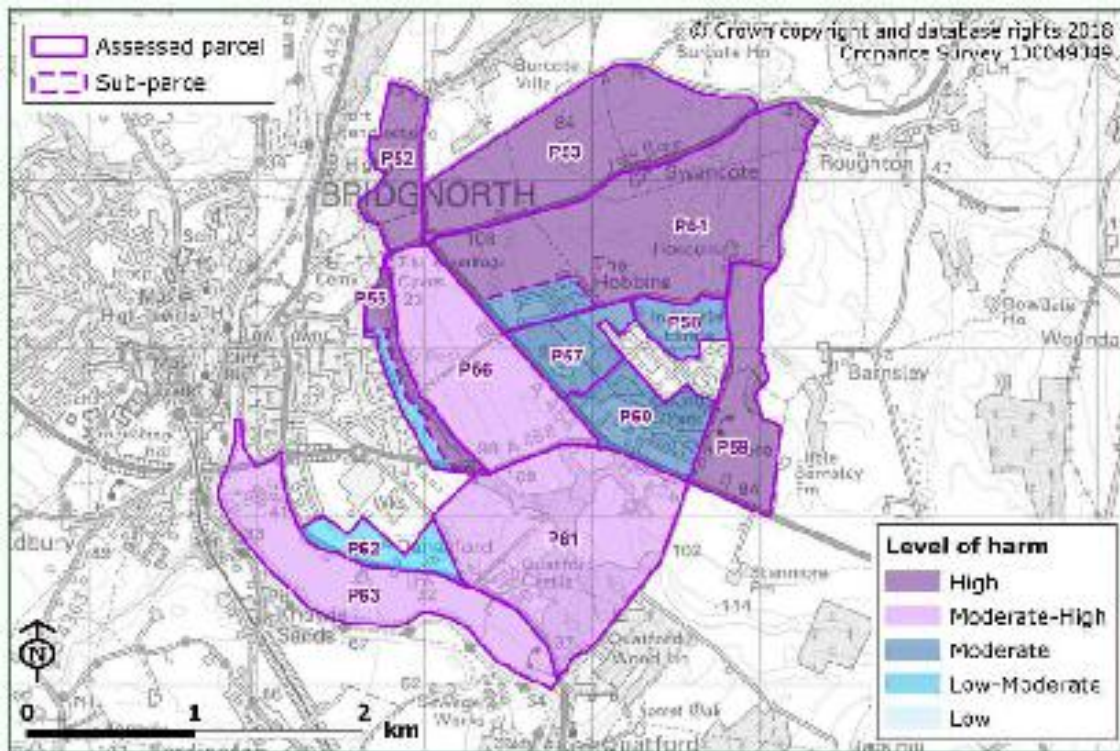


Figure A3.28: Individual Harm from Release of Parcels Surrounding Bridgnorth

The parcel assessment summarised on Figure A3.28 above indicates that the release of Green Belt land for development could result in a 'high' level of harm to the Green Belt in the far northeast and east (parcels P52, P53, P54, P59), as well as land (designated as ancient woodland) which forms the eastern extent of parcel P55. The release of land for development to the south of Bridgnorth (parcel P61 and P63) and to the east of Bridgnorth to the west of the A454 (Parcel P56) could result in a 'moderate-high' level of harm. In comparison, the release of land for development to the west, north and south of Stanmore Industrial Estate (parcels P57, P58 and P60), as well as the smaller sub-parcel P54 could result in a 'moderate' level of harm. Releasing the Green Belt land directly adjoining the south of Bridgnorth (Parcel P62 and sub-parcel P55) could result in a 'low-moderate' level of harm.

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

The assessment of the harm that could be caused by releasing Green Belt land for development has been tested through the identification of three distinct Opportunity Areas around Bridgnorth and by the identification of three further Sub-Opportunity Areas. The findings of these assessments are set out below.

Opportunity Area Bn-1

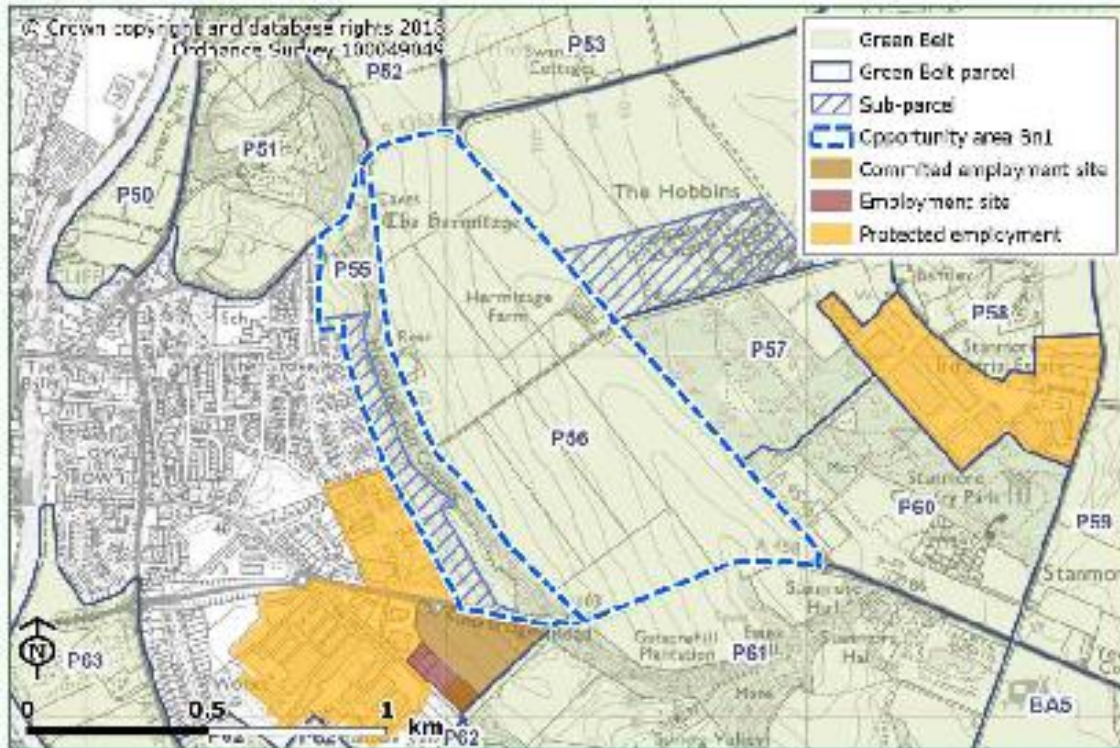


Figure A3.29: Opportunity Area Bn-1

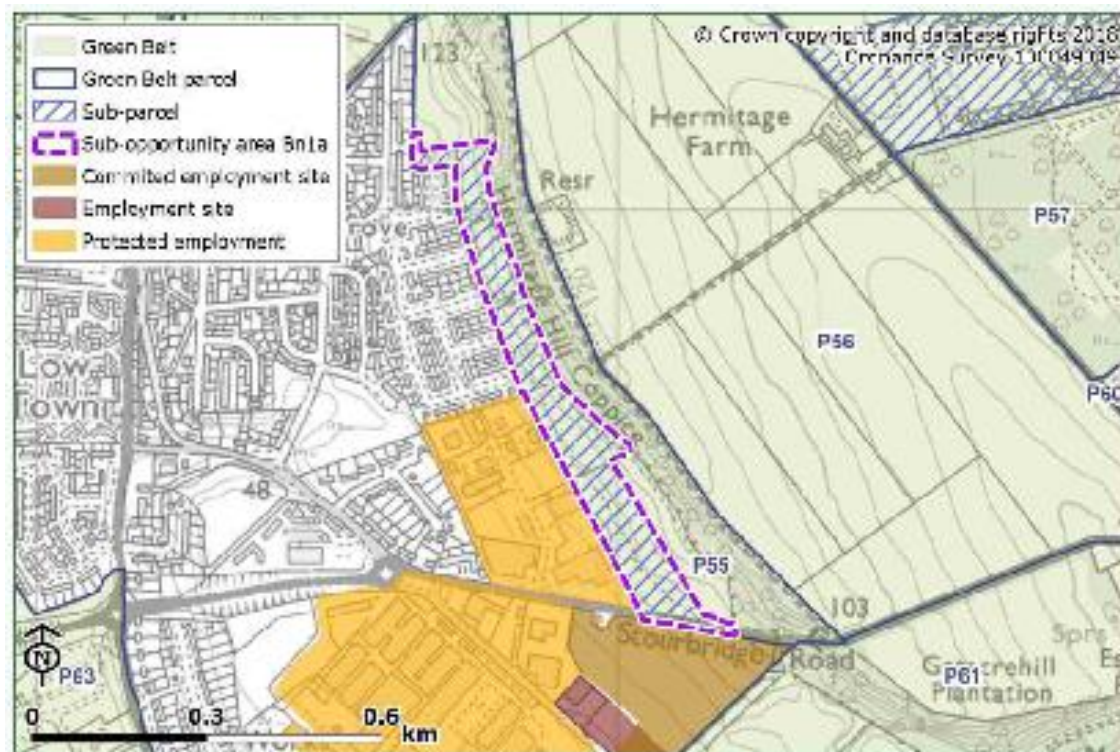


Figure A3.30: Sub Opportunity Area Bn-1a

Description of Opportunity Area Bn-1

Opportunity Area Bn-1 comprises the entire areas of parcels P56 and P55 to identify a potential direction for growth across the eastern boundary of Bridgnorth.

Sub-opportunity Area Bn-1a

A sub-opportunity area has been identified that would lead to a lower level of overall harm to the Green Belt. Sub-opportunity Area Bn-1a comprises the release of sub-parcel P55.

Summary of Assessment of Harm for Individual Parcels

The individual release of parcel P55 would have a **High** level of harm on the Green Belt. The individual release of parcel P56 would have a **Moderate-High** level of harm on the Green Belt.

Assessment of Harm for sub-parcels

The release of Sub-parcel P55 would have a **Low-Moderate** level of harm on the Green Belt.

Assessment of harm

Removal of Opportunity Area Bn-1

The removal of Bn-1 would result in development being sited beyond the current settlement edge of Bridgnorth on open agricultural land to the east of the distinctive band of ancient woodland of 'Hermitage Hill Coppice'. The land within parcel P56 slopes down to the east with the western areas of the parcel being more elevated and visually prominent than the surrounding land. Development within this parcel would be visible from neighbouring areas of Green Belt land, particularly to the north and northeast and would encroach on these areas of open countryside. The presence of established woodland within Stanmore Country Park and Stanmore Industrial Estate provide a degree of visual separation between parcel P56 and the wider countryside to the southeast, therefore the sense of encroachment resulting from this Green Belt release is likely to be lower. This woodland within P55 plays a key role in the setting of the historic settlement area within Bridgnorth therefore the release of Opportunity Area Bn-1 could significantly weaken the role of the Green Belt with regard to Purpose 4. The release of Opportunity Area Bn-1 would lead to a **High** level of harm to the Green Belt in this local area.

High Harm

No mitigation measures have been identified, as release of the opportunity area would have a high level of harm on the Green Belt.

Removal of Sub-opportunity Area Bn-1a

Sub-parcel P55 consists of a narrow strip of sloping grazing land set between Hermitage Hill Coppice woodland to east and the urban edge of Bridgnorth to the west. The adjoining settlement has a strong influence on the sub-parcel and woodland separates the land from the wider countryside to the east. The openness of the land does not play a key role in the setting of the historic town of Bridgnorth. Releasing Sub-opportunity Area Bn-1a would lead to a **Low-Moderate** level of harm to the integrity of the Green Belt in this local area.

Low-Moderate Harm

The following section sets out the mitigation measures that could be considered in order to minimise the degree of harm to the Green Belt associated with the release of Bn-1a.

Mitigation Measures

- Trees within 'Hermitage Hill Coppice' along the eastern edge of the Sub-parcel P55 should be retained and protected against any construction activity in accordance with best practice. These trees play a key role in preserving the setting of the historic town of Bridgnorth.

- Development within Sub-opportunity Area Bn-1a should be restricted to appropriate small scale and low density residential development of up to two storeys, or single storey employment development to minimise encroachment on neighbouring Green Belt land.
- Where possible, existing hedgerows along the road bounding south of the sub-parcel should be retained and enhanced to create coherent new Green Belt boundaries.

Opportunity Area Bn-2

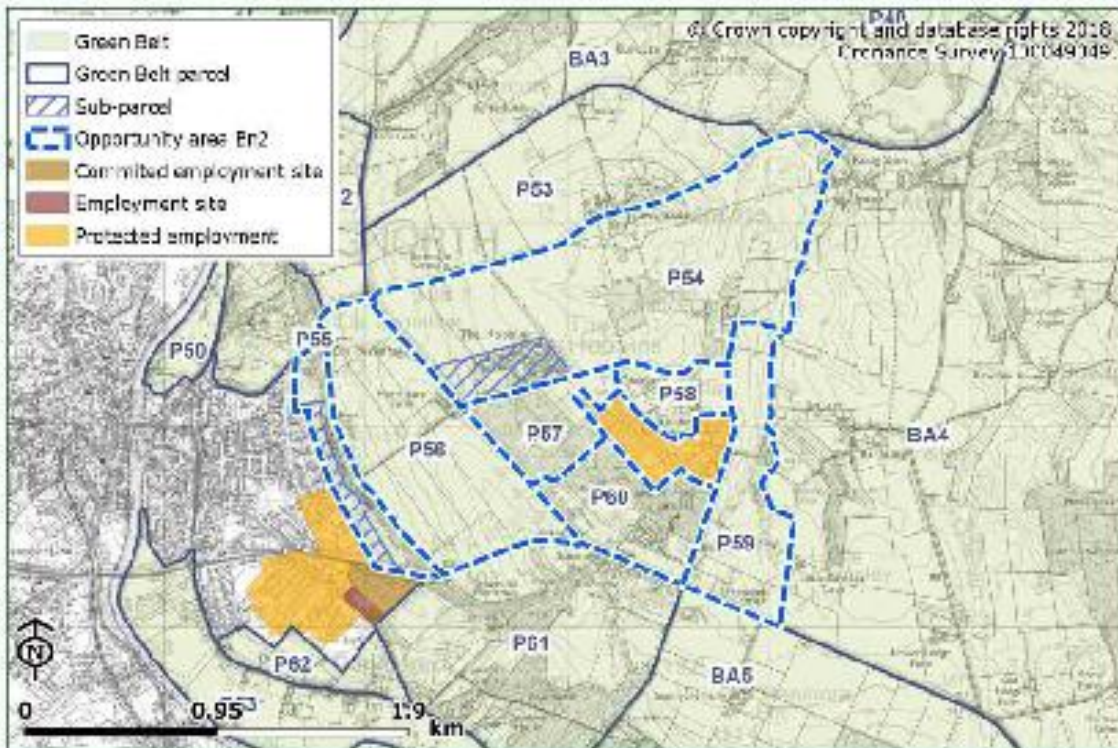


Figure A3.31: Opportunity Area Bn-2

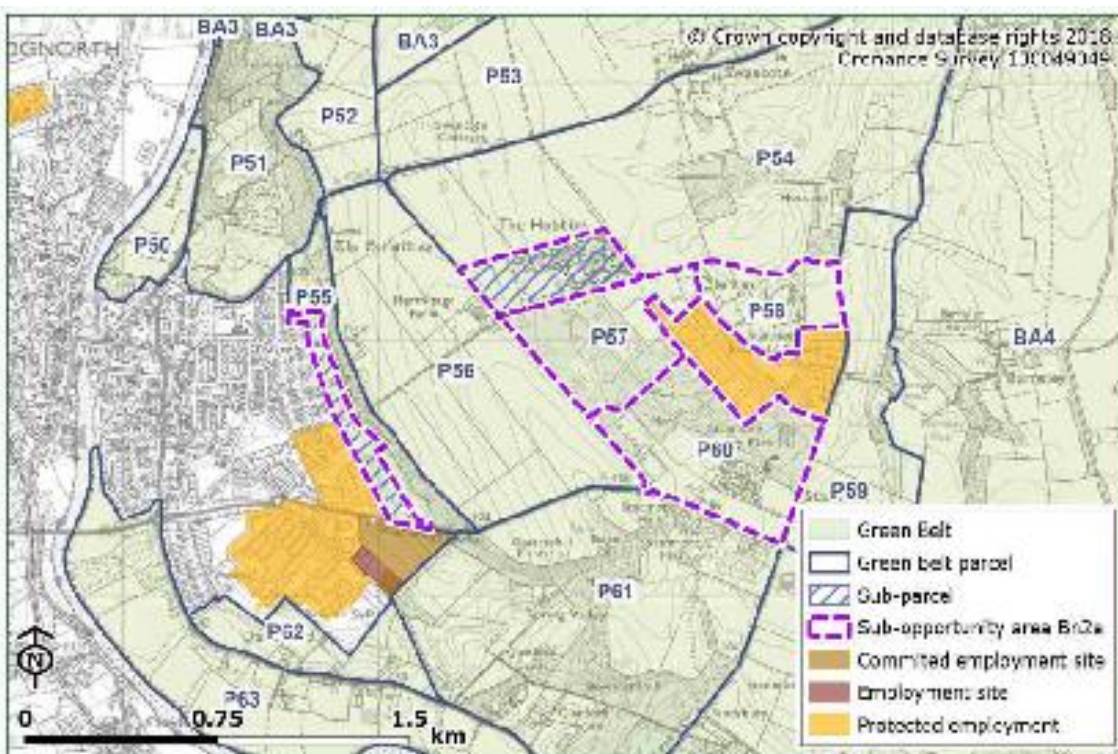


Figure A3.32: Sub-opportunity Area Bn-2a

Description of Opportunity Area Bn-2

Opportunity Area Bn-2 comprises the entire area of parcels P54, P55, P56, P57, P58, P59 and P60 to identify a potential direction for growth across the eastern boundary of Bridgnorth.

Sub-opportunity Area Bn-2a

One sub-opportunity area has been identified that would lead to a lower level of overall harm to the Green Belt. Sub-opportunity Area Bn-2a comprises the release of parcels P57, P58 and P60, as well as sub-parcels P54 and P55.

Summary of Assessment of Harm for Individual Parcels

The individual release of parcels P54, P55 and P59 would have a **High** level of harm on the Green Belt. The individual release of parcel P56 would have a **Moderate-High** level of harm on the Green Belt. The individual release of parcels P57, P58 and P60 could have a **Moderate** level of harm on the Green Belt.

Assessment of Harm for sub-parcels

The individual release of parcels P57, P58 and P60, and Sub-parcel P54 would have a **Moderate** level of harm on the Green Belt. The individual release of Sub-parcel P55 could have a **Low-Moderate** level of harm on the Green Belt.

Assessment of harm

Removal of Opportunity Area Bn-2

Parcels P54, P56, P58 and P59 form part of a wide area of open countryside located to the east of Bridgnorth. Releasing the entirety of these parcels from the Green Belt would constitute significant encroachment on the countryside. There is no separation between these parcels and the adjoining areas of open countryside and their release is likely to weaken the contribution of neighbouring Green Belt land to Purpose 3. The 'Hermitage Hill Coppice' woodland along eastern edge of parcel P55 also plays a key role in the setting of the historic town of Bridgnorth,.

The release of the Opportunity Area Ab2 would lead to a **High** level of harm to the Green Belt in this local area.

High Harm

No mitigation measures have been identified, as release of the opportunity area would have a high level of harm on the Green Belt

Removal of Sub-opportunity Area Bn-2a

The sub-parcel P55 is located along the settlement edge of Bridgnorth and is not part of the wider countryside and does not play a key role in the setting of Bridgnorth. Sub-parcel P54 is partly contained by development and does not have a strong connection to the wider countryside. Parcels P57 P58 and P60 are also partly enclosed by development and P60 contains the hamlet of Stanmore. The partial containment of these areas limits the harm of their release on the wider Green Belt. Removal of the sub-opportunity area could however lead to a degree of encroachment on P56 in relation to Purpose 3. As Stanmore is not a town considered under Purpose 2, release of the sub-opportunity area would not have any effect in relation to Purpose 2 – preventing the merging of towns.

Releasing Sub-opportunity Area Bn-2a from the Green Belt would lead to a **Moderate** level of harm to the Green Belt in this local area.

Moderate Harm

The following section sets out the mitigation measures that could be considered in order to minimise the degree of harm to the Green Belt associated with the release of *Bn-2a*.

Mitigation Measures

- Trees within Hermitage Hill Coppice along the eastern edge of the Sub-parcel P55 should be retained and protected against any construction activity in accordance with best practice. These trees play a key role in preserving the setting of the historic settlement area within Bridgnorth.

- Hedgerows and tree belts along the boundaries of parcels P57 and P60 should be retained and enhanced, to limit the potential harm to P56 in relation to Purpose 3.
- The hedgerows that line the boundaries of P58 and sub-parcel P54 should be retained and enhanced, with any gaps strengthened and new hedgerows/trees planted.
- Development within Sub-opportunity Area Bn-2a should be restricted to appropriate small scale and low density residential development of up to two storeys, or single storey employment development, to minimise encroachment on neighbouring Green Belt land.

Opportunity Area Bn-3

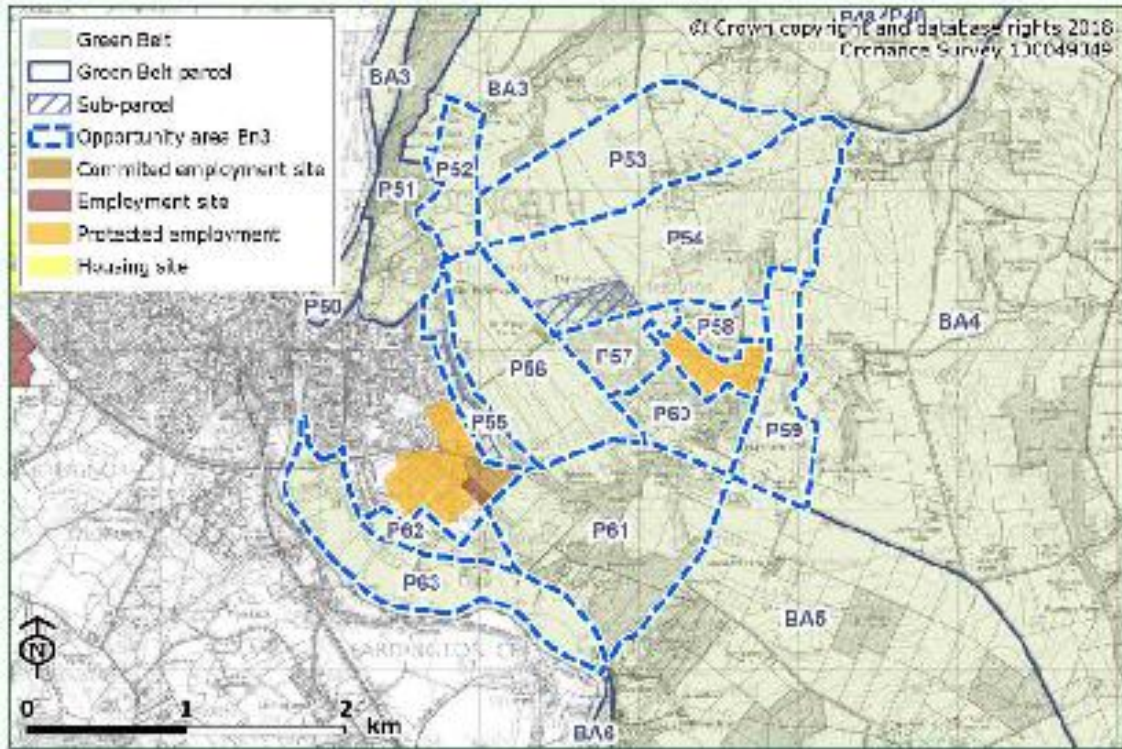


Figure A3.33: Opportunity Area Bn-3

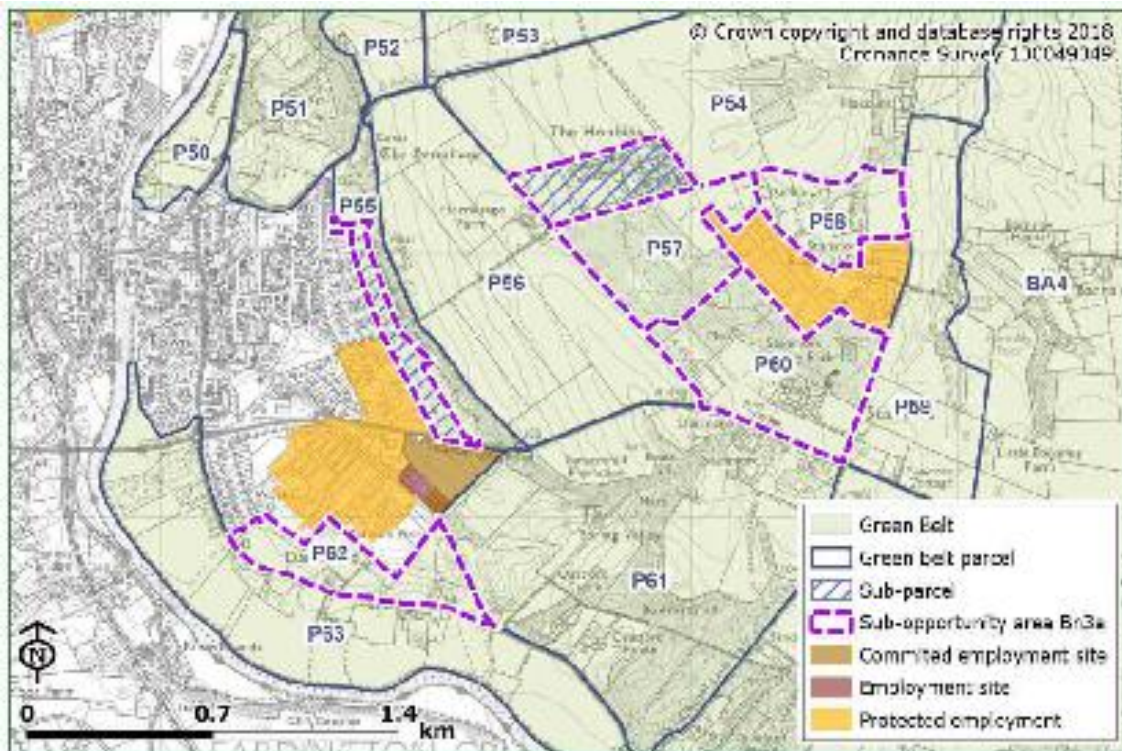


Figure A3.34: Sub-opportunity Area Bn-3a

Description of Opportunity Area Bn-3

Opportunity Area Bn-3 comprises the entire area of parcels P52, P53, P54, P55, P56, P57, P58, P59, P60, P61, P62 and P63 to identify a potential direction for growth across the eastern, north eastern and south eastern boundary of Bridgnorth.

Sub-opportunity Area Bn-3a

A sub-opportunity area has been identified that would lead to a lower level of overall harm to the Green Belt. Sub-opportunity Area Bn-3a comprises the release of parcels P57, P58, P60 and P62, and the release of sub-parcels P54 and P55.

Summary of Assessment of Harm for Individual Parcels

The individual release of parcels P52, P53, P54, P55, P59 and would have a **High** level of harm on the Green Belt. The individual release of parcels P56, P61 and P63 would have a **Moderate-high** level of harm on the Green Belt. The individual release of parcels P57, P58 and P60 would have a **Moderate** level of harm on the Green Belt. The individual release of Parcel P62 would lead to a **Low-Moderate** level of harm to the Green Belt in the local area.

Assessment of Harm for sub-parcels

The individual release of parcels P57, P58 and P60, and sub-parcels P54 would have a **Moderate** level of harm and P61 a **Moderate-high** level of harm on the Green Belt. The individual release of sub-parcels P55 and P62 would lead to a **Low-Moderate** level of harm to the Green Belt in the local area.

Assessment of harm

Removal of Opportunity Area Bn-3

Parcels P52, P53, P54, P56, P58, P59 and P61 form part of a wide area of open countryside located to the east of Bridgnorth. Releasing these parcels from the Green Belt would constitute significant encroachment on the countryside. There is no separation between these parcels and the adjoining areas of open countryside and their release is likely to weaken the contribution of neighbouring Green Belt land to Purpose 3. Furthermore, the 'Hermitage Hill Coppice' ancient woodland along the eastern edge of parcel P55 plays a key role in the setting of the historic town of Bridgnorth.

The release of the Opportunity Area Bn-3 would lead to a **High** level of harm to the Green Belt in this local area.

High Harm

No mitigation measures have been identified, as release of the opportunity area would have a high level of harm on the Green Belt

Removal of Sub-opportunity Area Bn-3a

Sub-parcel P55 is located along the settlement edge of Bridgnorth and is not part of the wider countryside and does not play a key role in the setting of Bridgnorth. Sub-parcel P54 is partly contained by development and does not have a strong connection to the wider countryside. Parcel P57, P58 and P60 are also partly enclosed by development and P60 contains the hamlet of Stanmore. Parcel P62 adjoins the industrial and residential settlement edge of Bridgnorth and is partly separated from open land to the south by the A442 and properties along the road. The partial containment of these areas limits the harm of their release on the wider Green Belt. Removal of the sub-opportunity area would however lead to a degree of encroachment on P56 in relation to Purpose 3. As Stanmore is not a town considered under Purpose 2, release of the Sub-opportunity area would have no effect in relation to Purpose 2 – preventing the merging of towns.

Releasing Sub-opportunity Area Bn-3a from the Green Belt will lead to a **Moderate** level of harm to the Green Belt in this local area.

Moderate Harm

The following section sets out the mitigation measures that could be considered in order to minimise the degree of harm to the Green Belt associated with the release of Bn-3a.

Mitigation Measures

- Trees within Hermitage Hill Coppice along the eastern edge of the Sub-parcel P55 should be retained and protected against any construction activity in accordance with best practice. These trees play a key role in preserving the setting of the historic settlement area within Bridgnorth.
- Hedgerows and tree belts along the boundaries of parcels P57 and P60 should be retained and enhanced to limit the potential harm to P56 in relation to Purpose 3.
- The hedgerows that line the boundaries of P58 and sub-parcel P54 should be retained and enhanced, with any gaps strengthened and new hedgerows/trees planted.
- Hedgerows and trees along either side of the A442 and Old Worcester Road along the southern and eastern boundary of parcel P62 should be retained and enhanced, with any gaps strengthened and new hedgerows/trees planted.
- Development within Sub-opportunity Area Bn-3a should be restricted to appropriate small scale and low density residential development of up to two storeys, or single storey employment development to minimise encroachment on neighbouring Green Belt land.

Part 4: Conclusions for Bridgnorth

The assessment has reviewed the potential harm to the Green Belt of releasing for development, individual parcels or sub-parcels identified in this Green Belt Review. This has subsequently informed the identification of three opportunity areas; and three sub-opportunity areas around the settlement of Bridgnorth.

The findings of the assessment of harm likely to result from releasing the opportunity areas or sub-opportunity areas for development are summarised in **Table A3.1**.

Table A3.1: Assessment of Harm for Opportunity Areas within Bridgnorth

Opportunity Area Reference	Area (ha)	Rating
Bn-1	100.6	High
Bn-1a	7.2	Low-Moderate
Bn-2	369.1	High
Bn-2a	93.4	Moderate
Bn-3	704.2	High
Bn-3a	110.6	Moderate

The consideration of the release of Green Belt land around Bridgnorth, set out in detail in the preceding sections and summarised in the table above, highlights the various potential Green Belt impacts arising from the possible release of land for development to meet the future needs of the settlement of Bridgnorth. The assessment in this Green Belt Review has shown that, 7.2ha of land (within opportunity area Bn-1a) could be released from the Green Belt for development with only low-moderate harm to the Green Belt, and up to 110.6ha of land could be released with moderate harm (under opportunity area Bn-3a).

Whilst development on Green Belt land may inevitably lead to some degree of encroachment into the countryside within the Green Belt, the strategic function of the West Midlands Green Belt will not be affected by such small scale releases of land in Bridgnorth. At both a strategic level and local level, there will be no harm to the role played by the West Midlands Green Belt in checking the unrestricted sprawl of the large built areas, preventing the merging of neighbouring towns, or preserving the setting and special character of historic towns.

Appendix EDP 4
Representative Photoviewpoints
(edp5653_d007a 26 August 2020 VP/VP)

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Photoviewpoint EDP 1: View from the A454 at the entrance to Stanmore Country Park looking south towards the A458



Roundabout junction
with A458

A454

Photoviewpoint EDP 2: View from the A454 at the entrance to Stanmore Country Park looking north across the site



Hermitage Hill Coppice

Entrance to Stanmore
Business Park and Stanmore
Country Park

A454

Hermitage Fa

Photoviewpoint EDP 3: View from footpath (Ref. 0151/70/1) looking south-east across the site

Hermitage Farm House

Footpath (Ref. 0151/70/1)

Long-distance views of the undulating and well-wooded landscape

Stanmore Country Park

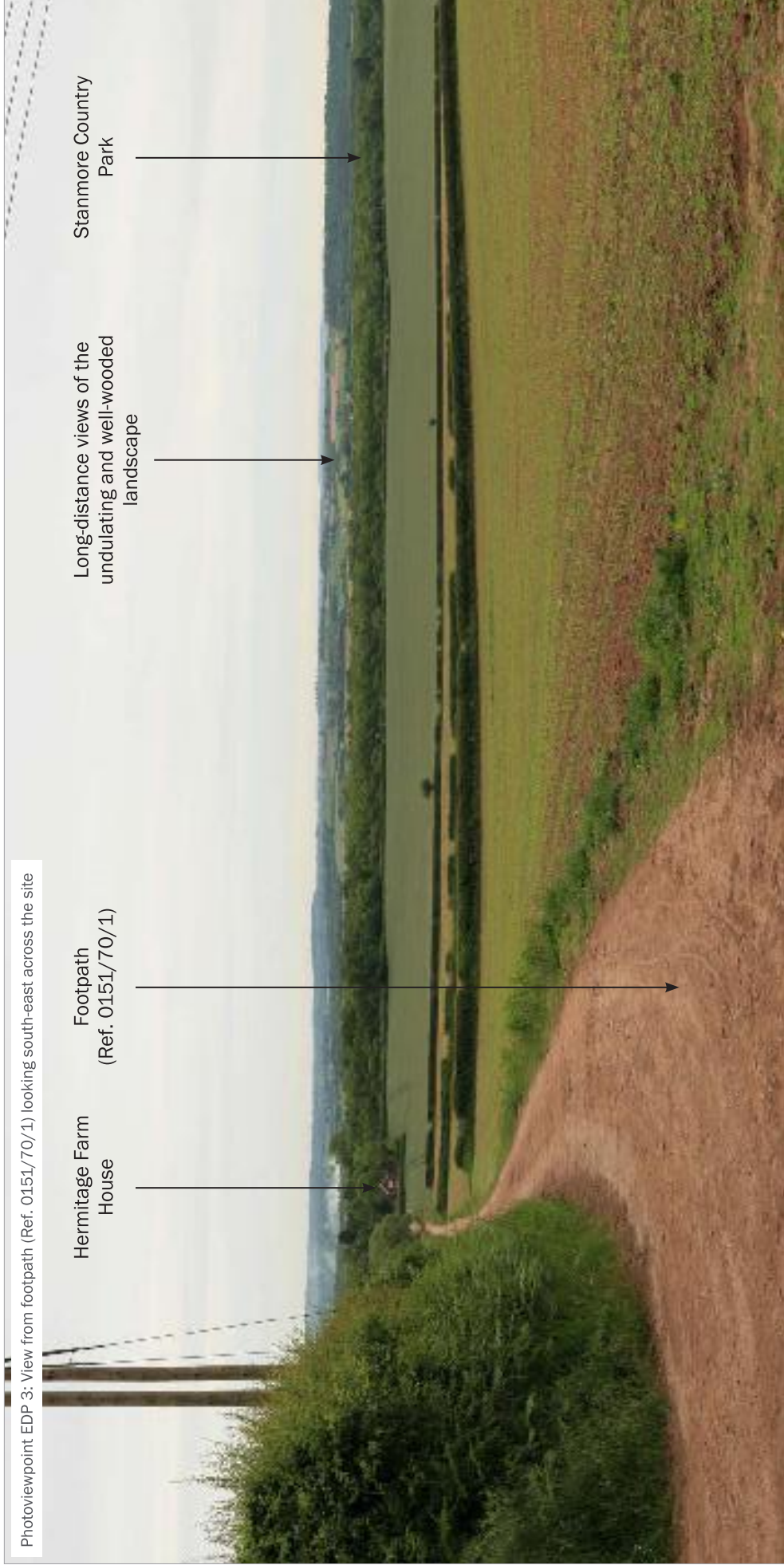
Photoviewpoint EDP 4: View from footpath (Ref. 0151/70/1) looking north across the site

Mature woodland blocks

A454 and Wolverhampton Road roundabout

Long-distance views of the elevated landform to the north-east

A454



Photoviewpoint EDP 5: View from footpath (Ref. 0151/70/1) looking south-east across the site

Footpath
(Ref. 0151/70/1)

Hermitage Farm
House

Stanmore Country Park
comprising mature woodland
screens easterly views



Photoviewpoint EDP 6: View from A454 looking west across the site

Hermitage Hill Coppice



Photoviewpoint EDP 7: View from footpath (Ref. 0151/59/1) looking towards 'The Hobbins' residential area and the site

Views of woodland on elevated ground to the south-east

'The Hobbins' raw residential edge

Dwellings are flanked by mature woodland within Stanmore Country Park



Photoviewpoint EDP 8: View from BOAT (Ref. 0118/UN1/2) looking west towards the site

BOAT (Ref. 0118/UN1/2)

Titterstone Clee Hill

Brown Clee Hill

Hermitage Hill Coppice

Stanmore Country Park

Industrial buildings visible within Stanmore Business Park



Photoviewpoint EDP 9: View from a minor road leading to Roughton looking west towards the site

Brown Clee Hill

Hermitage Hill
Coppice woodland is visible on the horizon



Photoviewpoint EDP 10: View from a minor road off the A458 (opposite Old Lodge Farm) looking north-west towards the site

A458

Views of the site are screened by intervening mature vegetation and the undulating topography



Mature trees and framing regular f typical of the

Photoviewpoint EDP 11: View from bridleway (Ref. 0151/72/1) looking north-west towards the Site

A458

Glimpsed views of the site

Stanmore Country Park

Bridleway (Ref. 0151/72/1)

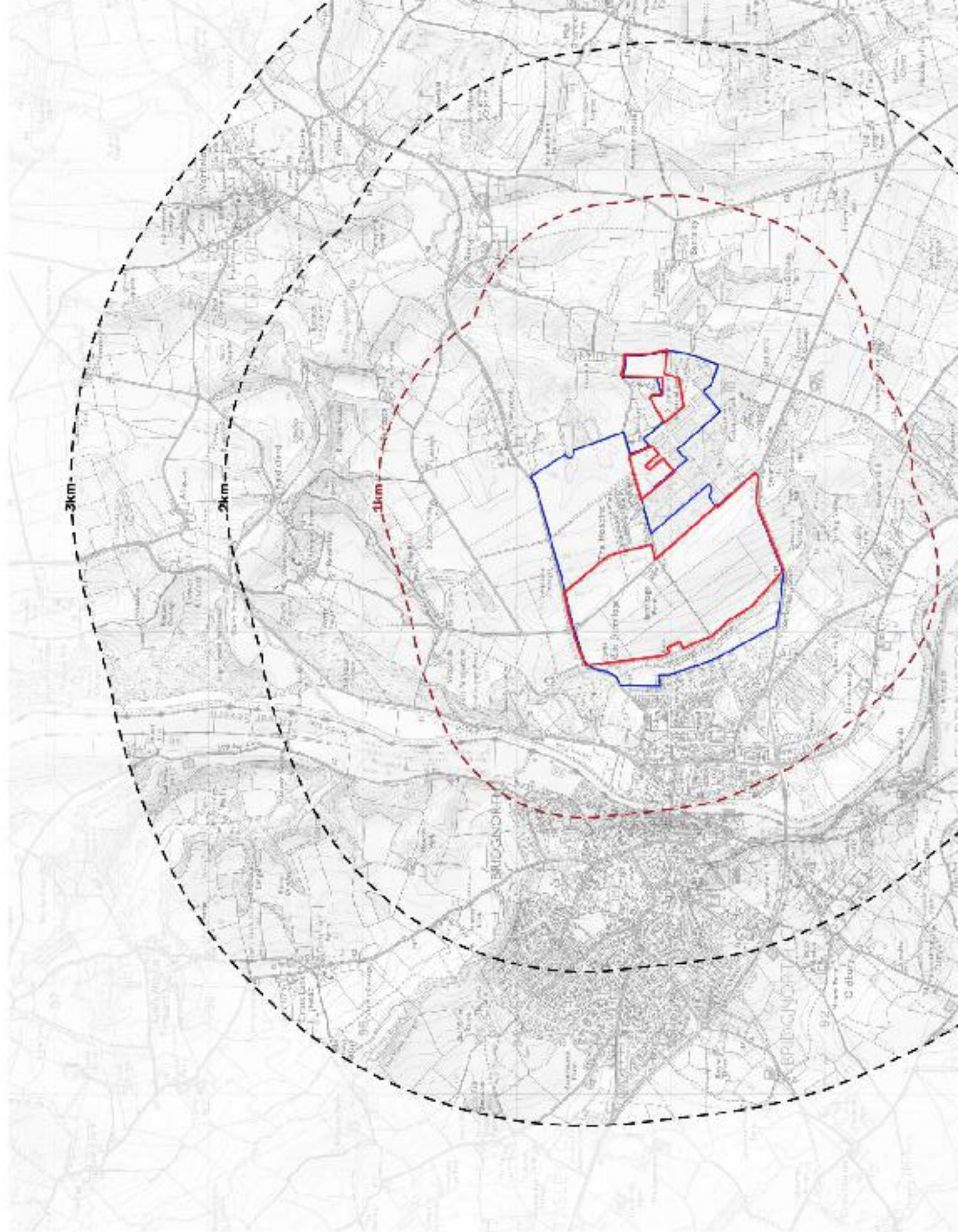
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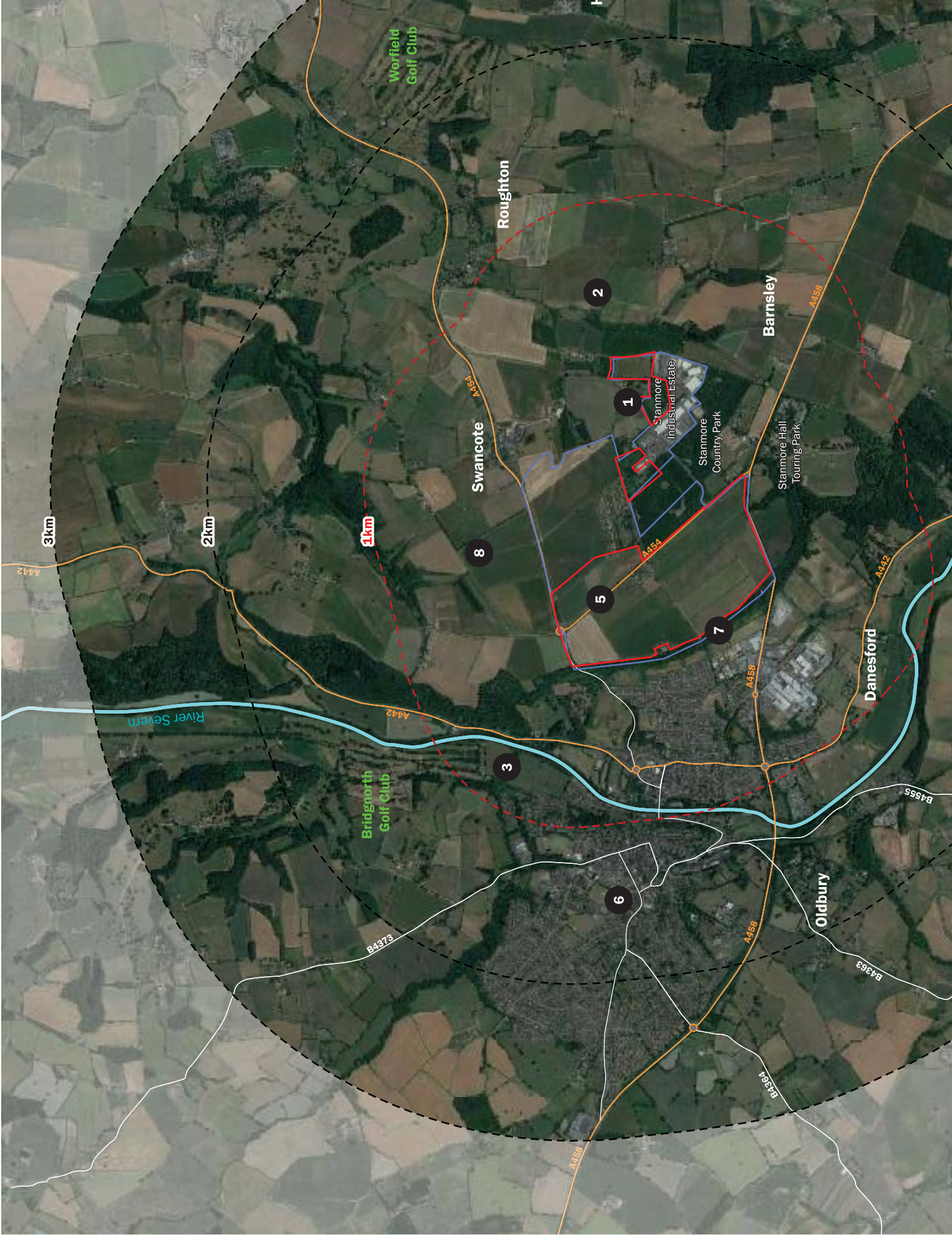


Plans

- Plan EDP 1** Site Location and Site Boundaries
(edp5653_d001c 08 September RB/VP)
- Plan EDP 2** Site Character and Local Context
(edp5653_d002c 08 September RB/VP)
- Plan EDP 3** Relevant Planning Designations and Considerations
(edp5653_d003c 08 September RB/VP)
- Plan EDP 4** Published Landscape Character Assessments
(edp5653_d004c 08 September RB/VP)
- Plan EDP 5** Visual Receptors
(edp5653_d005c 08 September 2020 RB/VP)
- Plan EDP 6** Findings of Visual Appraisal
(edp5653_d006a 08 September 2020 RB/VP)

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Worfield Golf Club

Roughton

Barnsley

3km

2km

1km

Swancote

2

1

Stanmore Inclusive Estate

Stanmore Country Park

Stanmore Hall Touring Park

8

5

7

Danesford

River Severn

3

B4373

6

Oldbury

B4363

A458

B4364

B4555

A458

A454

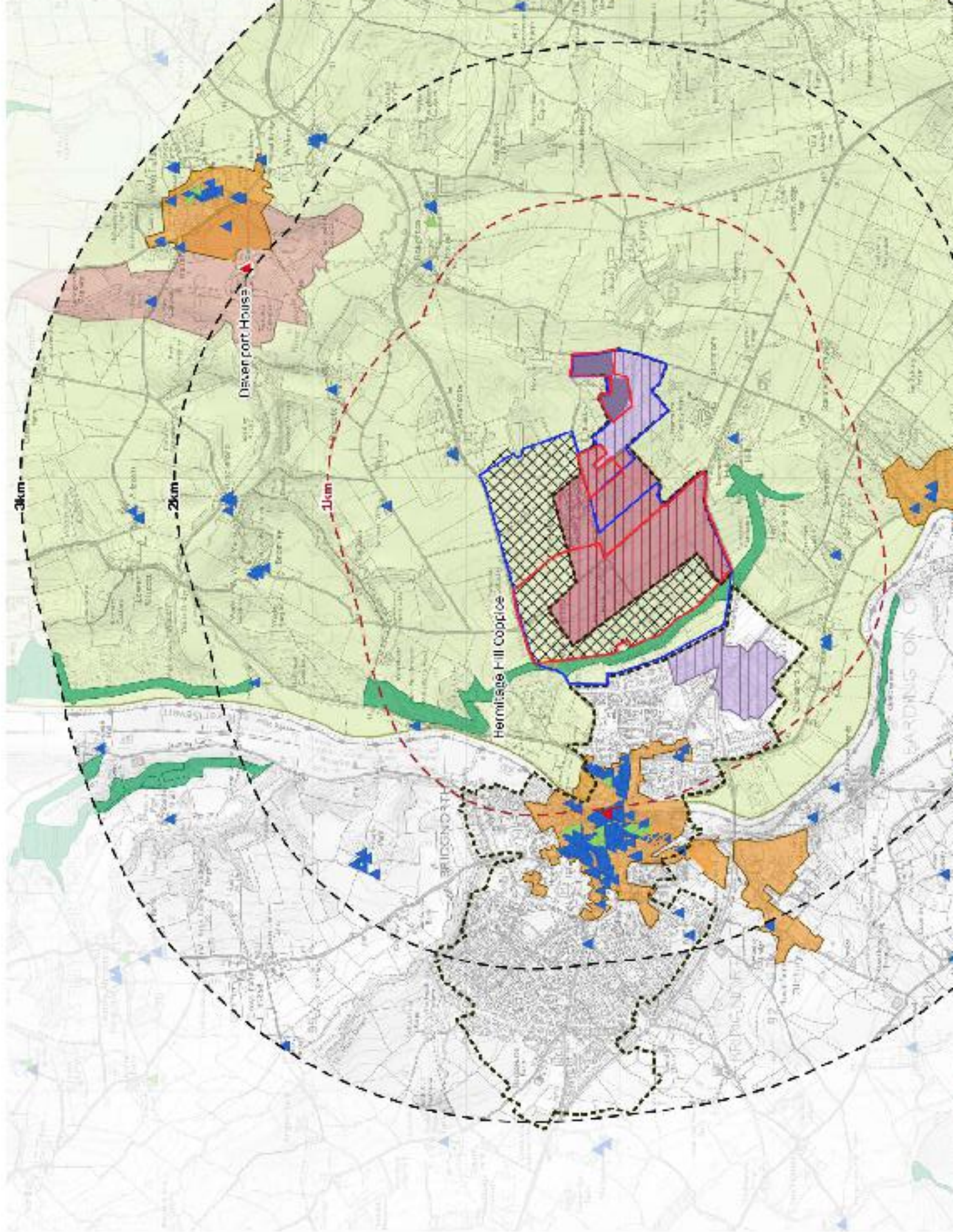
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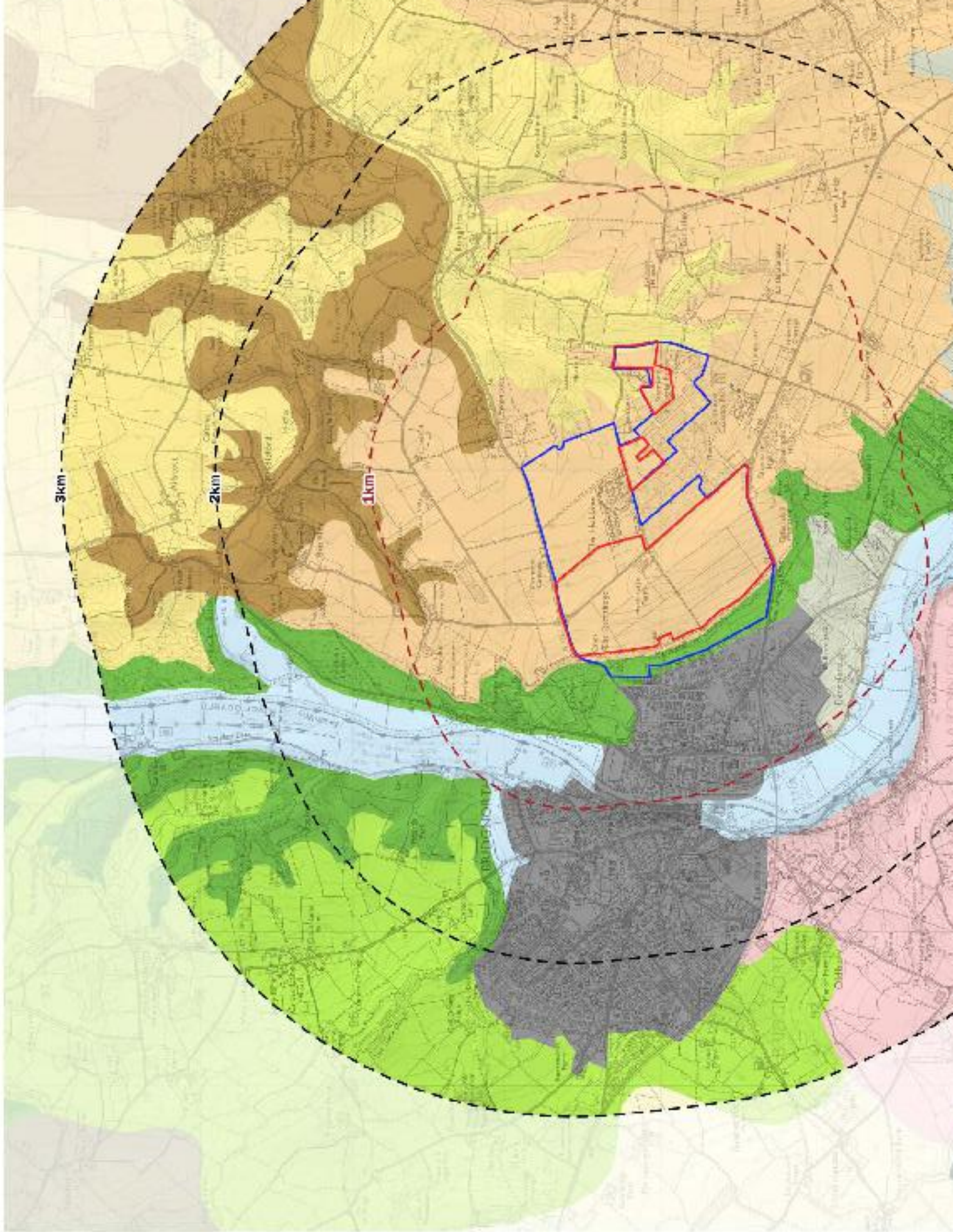
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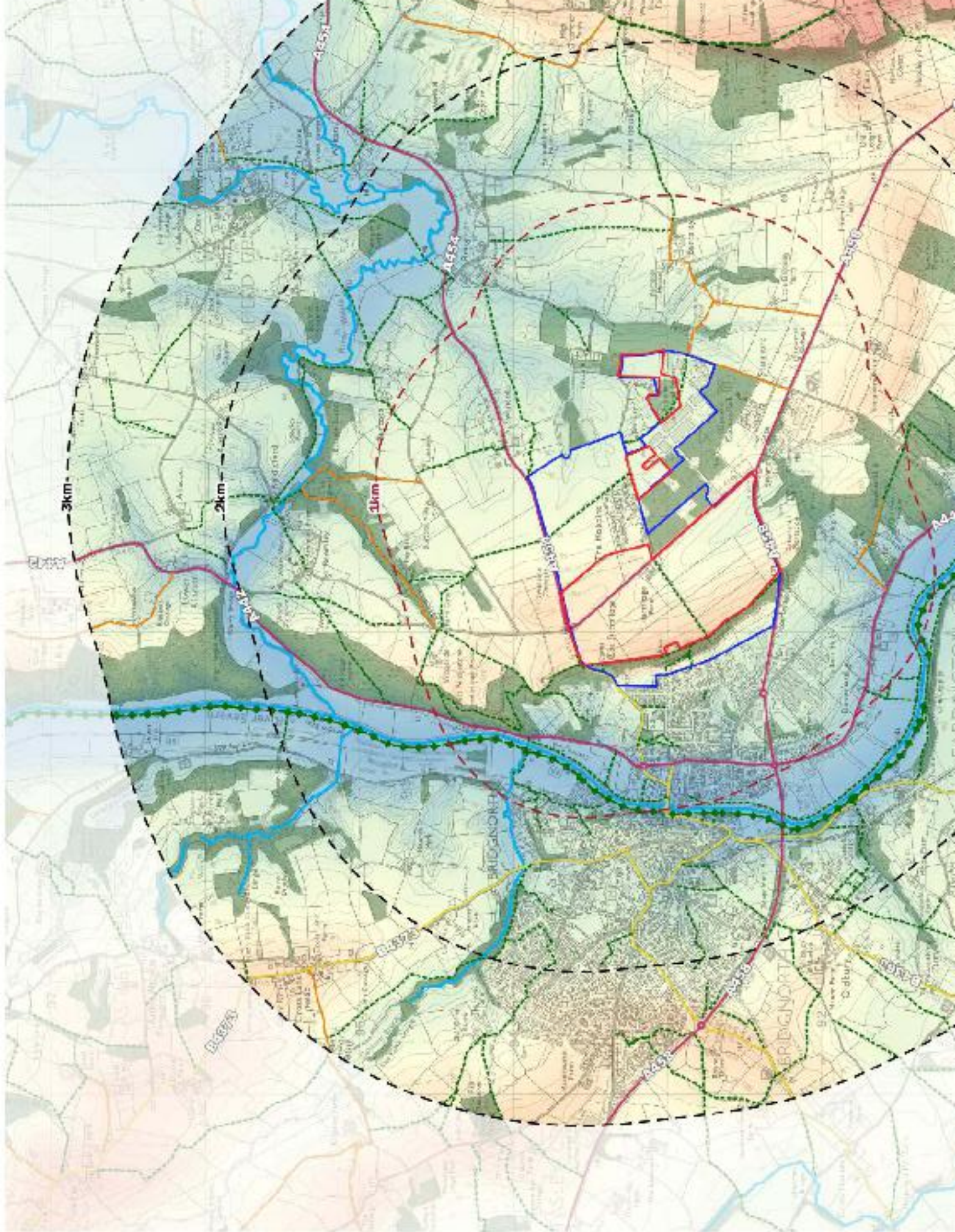
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A458

B4555











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Appendix 3 - Reg 18 - Appendix L - Stanmore GB Exceptional Circumstances - July 2020



**SHROPSHIRE LOCAL PLAN REVIEW -
GREEN BELT EXCEPTIONAL CIRCUMSTANCES**

**ON BEHALF OF
APLEY ESTATE AND STANMORE PROPERTIES**

STANMORE GARDEN VILLAGE, EAST OF BRIDGNORTH

Our Ref: KW/RJB/8432

July 2020

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1. INTRODUCTION

- 1.1 We act on behalf client's Apley Estate and Stanmore Properties in respect of proposals for a new Garden Community at Stanmore, east of Bridgnorth.
- 1.2 The proposal is the Preferred Site Allocation in the Shropshire Local Plan Review: Consultation on Preferred Sites of November 2018. The purpose of this report is set out the exceptional circumstances that exist to justify changes to the Green Belt boundaries to allocate the proposed Stanmore Garden Village.

2. BACKGROUND

- 2.1 The background is that the Council is undertaking Green Belt review as directed by the Report of the Examination of SAMDev 2015 which led to an amendment to the SAMDev Plan to require Green Belt Review in the Local Plan Review. The reasoning in paragraph 189 and 190 of the Inspectors Report being:

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

- 2.2 In summary, the size and location of the town make it attractive to inward investment and the potential is directly related to the eastern side the town due to its ease of connection with the conurbation. The emphasis is on the provision of good quality employment land to provide a long term benefit. It follows that for the town to reach its potential, housing and employment should in balance and in opening up a new area the juxtaposition of uses provides for long term growth of a new quarter for the town. The Council have identified a need to accommodate growth for existing businesses,

justified by key market signals in the local economy with the departure of key local employers in recent years who could not expand in Bridgnorth.

- 2.3 In applying the process of Green Belt review in NPPF 136-138, the Council has examined fully all other reasonable options for meeting its identified need for development and in so doing has identified a potential site outside of Green Belt at Tasley. The Tasley site promoted by Taylor Wimpey, however, is considered by Stansgate to be inferior for a number of reasons and has sought advice from leading Counsel on whether exceptional circumstances exist to justify changes to allocate Stanmore.
- 2.4 Leading Counsel Christopher Young QC, provided an Opinion dated 17 June 2020 which is already in front of the Council but enclosed for ease of reference. This sets out a legal interpretation of what exceptional circumstances means and how it can be applied with reference to Stanmore.
- 2.5 The key points from this Opinion on what exceptional circumstances means are:
- It is a matter of planning judgement to identify 'exceptional circumstances' and there can be as few as one or a combination of factors which add up to them being 'exceptional';
 - it is a less demanding test than 'very special circumstances' used for planning applications; removing land from the Green Belt does not have to be a 'last resort', although clearly the NPPF criteria in paras 137-138 should be satisfied;
 - unmet need can be an exceptional circumstance, and it does not need to be 'extraordinary', but it is important to consider the nature and degree of need, why it cannot be met elsewhere, how it might impact on the purpose of the Green Belt, and whether the proposed development might contribute to a sound spatial strategy;
 - it is reasonable to allow for headroom or slippage to 'future-proof' a plan, particularly where the NPPF expects changes to the Green Belt to be infrequent.
- 2.6 Paragraph 29 of Counsels Opinion states other sound planning reasons for allocating housing sites in the Green Belt would include selecting sites which are in sustainable locations, sites close to major areas of employment or sites with less landscape and visual impact. Paragraph 31 draws attention to a decision 4 May 2020 where a Rail Freight Interchange was granted permission in the Green Belt despite a non-Green Belt site alternative. One of the main reasons why that non-Green Belt alternative was

rejected was because of the landscape and visual impact.

- 2.7 Furthermore, in the context of the NPPF paragraph 138, Counsels advises the Council has to demonstrate it has fully examined the reasonable alternatives but that does not mean, it has to carry out some kind of exhaustive search of sites outside the Green Belt and it is perfectly entitled to decide to meet its housing need by allocating housing around settlements in the Green Belt for a variety of planning reasons, so long as those reasons are set out clearly (paragraph 31).

3. EXCEPTIONAL CIRCUMSTANCES

- 3.1 In the case of Stanmore, there are a number of matters that cumulatively amount to exceptional circumstances as set out below.

Unmet Housing and Employment Need

- 3.2 The unmet housing and employment need is an exceptional circumstance. The matter of where to put it should follow the stages of NPPF paragraph 137:
- a) Brownfield sites - The SLAA would confirm that as much use as possible of brownfield and under-utilised land has been made. There are no such suitable sites in Bridgnorth.
 - b) Increased Density - There is only one undeveloped allocation in Bridgnorth where the density could be considered for an increase to address new housing need, this is a site at Tasley for 500 houses (SAMDev Policy S3). The density is already over 30 dwellings per hectare and the location on the rural edge of the town makes it unsuitable to provide any meaningful increase in density.
 - c) Cross boundary allocation - no evidence is available from Shropshire Council on cross boundary discussion but their response to contact from the adjoining authority to the south, Wyre Forest, records their view that the rural nature of the edge of Shropshire and lack of settlements close to the boundary makes it too distant for Shropshire to meet the needs Wyre Forest. The converse must also therefore be the case that Bridgnorth is too far from the boundary that its need cannot be met in that adjoining authority area.

- d) Views of other authorities are not known but the distance to the boundary means the same circumstances apply.
- 3.3 As the need cannot be met from brownfield sites, increased density or across the boundary, it needs to be met around the edge of Bridgnorth.
- 3.4 The residual need is stated in the Preferred Sites Consultation 2018 as 912 houses and 16ha employment land. The specific justification for the additional employment land of 12ha, over the 4ha local need, is to provide for additional growth by existing businesses. It follows that this should be located where there are existing businesses thus providing them the opportunity to expand in their current location. There is an existing successful Business Park at Stanmore and there are other businesses to the east of the town. Hatch-Regeneris identify a lack of an established industrial/business location to the south west of Bridgnorth.
- 3.5 The commercial property market has suggested that the supply of industrial space in the right location is very limited and there is a need to increase the breadth and quality of jobs in the Town and provide support to the growth of key sectors for Shropshire. Hatch Regeneris consider this to be important in order to address the long-standing challenge of enabling the Town to retain more of its resident workforce. They highlight that there is no evidence that a development to the south-west of Bridgnorth at Tasley would provide a source of employment opportunities that would be a good fit for Bridgnorth's working population, which will reduce the need for out commuting; whereas development and expansion at Stanmore to the east, which already draws on a local workforce, would provide a more sustainable solution. They consider that the commercial developer preference is for east Bridgnorth.
- 3.6 It further follows the housing and employment should be located together to open up a new long term growth area and to provide employment opportunities for people living in the housing, this is a key principle of garden communities. A development in the Tasley location to the south-west of Bridgnorth will result in the population of the residential area having to travel greater distances to employment opportunities to the east, particularly given the high number of residents working and the Back Country, resulting in greater traffic congestion in the town. This is considered further in the Highways comment below.
- 3.7 The SAMDev Inspector recognised the need to open up new areas to accommodate

the long term future of the town. The level of the housing need and the benefits of juxtaposition of uses, both new and existing means it cannot be met in any other way than to open up a new quarter for the town.

- 3.8 Meeting the need in a single location provides a great opportunity for a sustainable long term vision.

Employment

- 3.9 As set out in considering Unmet Need above, the growth strategy for employment is driving the need. Such need is evidenced by socio-economic statistics in the reports prepared for my client by Hatch-Regeneris and MacMullen Associates (submitted to the Council March 2020 in the Vision document Appendices A1 and A2) and is reflected in the additional employment land proposed to recognise the considerable potential of Bridgnorth to attract inward investment and the market signals that existing businesses need to grow. The development of the existing employment base within the Town particularly that to the east is identified by Hatch Regeneris as having the potential to grow and expand further. The ONS data in the Hatch report clearly underpins the success of Stanmore and supports the opportunity for inward investment. The ONS data suggests that employment in Bridgnorth (including Stanmore) increased in the period 2013-2017 by 1,100 jobs, 350 of which were at Stanmore. At 20% this growth compares with +7% (Shropshire) +9% (Telford) and a fall of 9% in Wolverhampton. The Stanmore business park is therefore a key driver of the need for development. It has been running at 97% capacity and is reported to be turning away enquiries due to lack of available space.
- 3.10 Locating growth where the need arises means around Stanmore Business Park should be the clear focus for a new quarter for the town where new jobs will be created and is the commercial developer preference as set out in Unmet Need above. Furthermore, Stanmore is far better located to reach major areas of employment in the conurbation and other employment areas of Bridgnorth, than alternative sites around Bridgnorth outside of Green Belt. This is demonstrated in the survey responses received and reported in MacMullen Associates report (submitted to the Council March 2020 in the Vision document Appendix A2).
- 3.11 That the need is best met in this specific location, demonstrates exceptional circumstances.

Landscape and Visual Impact

- 3.12 Stanmore is a contained landscape, which is in contrast to other areas around Bridgnorth. On behalf of my client EDP has prepared a Landscape and Visual Appraisal dated 18 March 2020 in respect of Stanmore Garden Village (submitted to the Council March 2020). It states in respect of the character and local context of the site at paragraph 3.10 *“The existing settlement edge of Bridgnorth is well defined in many places by mature trees and hedgerows, which, while creating a softer built edge, does create physical and perceptual separation with the site (refer to Plan EDP 2). **The site itself benefits from the containment offered by Hermitage Hill Coppice to the west, and Stanmore Country Park and other surrounding woodland plantations to the east, in addition to well-established field boundaries that offer the basis for further reinforcement.**”*
- 3.13 It finds the visual amenity is informed by the underlying character of ‘Enclosed Lowland Heath’ which is of a flat to gently rolling lowland character with mature hedgerows, trees and agricultural farmland that limit the potential visual envelope of the site. Views of the internal fabric are generally contained to users within the site. In long distance views, Hermitage Hill Coppice can be seen. Whereas the existing built form is well screened by the intervening landform, woodland and field boundary vegetation, reducing intervisibility beyond 1km. This is partly owing to the lower lying ground and the proximity of Stanmore Country Park (paragraphs 4.1-4.2).
- 3.14 The Council’s Landscape and Visual Sensitivity Assessment (LVSS) states of the overall parcel around Stanmore, that far exceeds the site itself, *“This area has a typically rural character with a robust network of hedgerows and rolling landform, benefitting from the scenic quality and screening properties of woodland in Stanmore Country Park and in the adjacent parcel D. The relative number of people within this sensitivity parcel is high. The often elevated and open aspect means that some views experienced are of particular sensitivity to change, however overall throughout the parcel, there is a **medium sensitivity to change arising from housing and employment.**”* The area of the garden community is a small part of the parcel assessed and the valley where the development is proposed is a more intimate landscape than the wider parcel.
- 3.15 Overall, the Stanmore site is generally well contained from the wider area with the

- existing core of built development and trees providing screening.
- 3.16 By way of contrast in looking at other locations for development around the edge of Bridgnorth, land at Tasley is assessed by EDP from a landscape and visual perspective with their findings submitted to the Council in a Landscape Position Paper 20 June 2020. They consider that Land at Tasley is situated in 'deep countryside', where there are no visual connections to the urban area and where development would form a significant intrusion into the otherwise scenic rural landscape which is highly visible from numerous publicly accessible locations to the south and west. Views of the site and its immediate surroundings are rural in character and feel, by reason of its isolation from the existing settlement of Bridgnorth. Therefore, their conclusion is this is not a suitable location for development of a new Garden Village for Bridgnorth.
- 3.17 This corroborates the Council's LVSS that describes the parcel that includes Tasley as having "*...a strong sense of remoteness and tranquillity away from the main roads which is vulnerable to loss or erosion due to visual or noise disturbance from new development.*" The change in landscape character of this rural landscape to an urban extension would be apparent across the wider landscape and harm the current deeply rural character.
- 3.18 The Council's LVSS describes visual sensitivity as "*There are occasional views towards the Shropshire Hills AONB and Oldbury Conservation Area, all of which contribute to highly scenic views. The relative number of people within this sensitivity parcel is high, however many views are contained by landform and vegetation. The scenic quality combined with the absence of detracting features means that the views experienced are of medium sensitivity to change arising from new housing and medium-high sensitivity to change arising from employment.*"
- 3.19 The Council's LVSS concludes that overall the sensitivity of the Tasley landscape to **change arising from new housing development is medium and for employment medium-high.**
- 3.20 The conclusions of the LVSS are consistent with Counsel's Opinion which concludes, the Tasley site is far more expansive in the landscape despite the similar sensitivity outcome of the LVSS. "*[T]he Tasley proposal sits in a much larger valley and would therefore change the nature of that valley to a much more extensive degree. Added to which, the Tasley proposal extends into what might be described as deep countryside. Its edges brush close to the valley bottom, populated by very occasional*

houses and hamlets. In contrast, the outer edge of the Stanmore proposal is enveloped to a large extent by an extensive existing employment site. Therefore, despite both sites being located on the edge of Bridgnorth, the difference in the landscape and visual impact of the two proposals is chalk and cheese.” (Paragraphs 33-34)

- 3.21 The landscape and visual impact at Tasley is considered to be much greater than at Stanmore.

Highways

- 3.22 PJA on behalf of my client provided an Appraisal dated March 2020 of the impact and opportunities of Stanmore (submitted to the Council March 2020). Traffic survey, and junction capacity modelling were carried out. Trip generation used a worst case scenario assuming 68,000sqm employment, when 60,000sqm is the likely level. They concluded that of 8 junctions assessed, all except 2 work within capacity after development. The 2 that require further consideration are Junction 5 - A442 Cann Hall Road / St John Street and Junction 6 - A442 Mill Street / A442 Cann Hall Road / B4363 Mill Street. Overall, for the scale of the proposals there is generally capacity in the existing highway and the impact of the development can be accommodated within the existing infrastructure.
- 3.23 Vehicle access to the site from A454 is generally unconstrained and speed can be reduced to an appropriate speed limit, passing through the proposed local centre with new footpaths, cycleways, pedestrian crossings and appropriately designed access junctions to reduce speed and severance. To enhance sustainability, Park and Choose would allow residents a choice of sustainable modes of travel. It is envisaged this would be centrally located in the village and provide a choice of cycle parking and hire; pool cars for hire; electric bike/scooter; and high quality bus service not Bridgnorth.
- 3.24 Opportunities for pedestrian and cycle linkage exist using Park and Choose and using existing PRsOW through Hermitage ridge woodland and/or an existing cleared gap under low voltage overhead power lines. The area under the overhead lines is cleared to 25m wide by Western Power every three years. EDP advise use of this route would have minimal impact on trees and ancient woodland generally. If any areas of heightened sensitivity were discovered sections of raised path on stilts would greatly reduce any impact. Provision of formal access would greatly enhance the woodland to ensure the woodland's sustainability by protecting it from existing and potentially increased

- footfall. All land is owned by the promoters.
- 3.25 Overall, it is demonstrated at Stanmore that the tests set out in NPPF paragraph 108 have been met.
- 3.26 By way of contrast in looking at an alternative site at Tasley, there are fundamental questions on the ability of the site to deliver sustainable development. On behalf of my client PJA provided a Technical Note 10 June 2020 (submitted to the Council June 2020) that questions the access proposals, the feasibility of a footbridge, the accessibility of the site and the trip generation and distribution. Notably, the trip distribution, which is considered to be underestimated, shows 75% of traffic will cross the river on the A458 bypass to reach the Stourbridge Road/Kidderminster Road roundabout which is known to be of concern locally. Furthermore, it is estimated by the Consortium that development at Tasley instead of Stanmore will result in an additional 2 million miles of commuting a year.
- 3.27 Proposed linkage to the town is inadequate. The promoters have no land control of any land fronting the bypass to provide suitable linkages, which are considered to be very important to provide a sustainable development. The promoters initially propose linkage by road crossing at grade over the bypass carriageway which is subject to national speed limit. A bridge, considered necessary by the Council, will need land outside the control of the promoter. The promoter has provided no evidence to demonstrate that a satisfactory bridge connection can be achieved, and this remains a significant question as to whether the scheme can be delivered. Further, a bridge if it could be achieved will require removal of the dense tree screen at the roundabout.
- 3.28 Overall, the Stanmore site has limited highway impact and good opportunities for linkages to Bridgnorth by a choice of modes of travel and footpath link that can be delivered as part of an overall vision for a new garden community without significant adverse impact on ancient woodland. Tasley raises fundamental questions that are unanswered and due to the location south west of the town is considered to have a greater traffic impact than Stanmore to the east of the town.

The proposal - Stanmore Garden Village

- 3.29 There are significant benefits of a long term vision for a new garden community with its own facilities offering a sustainable long term solution, consolidating and enhancing sustainability of an area of existing built development at Stanmore Business Park, the

country park, The Hobbins and Russells Close. There is already a cluster of development and urbanising uses at Stanmore to provide the focus. Moreover the scope to provide a real (and viable) village centre is enhanced by the existence of significant demand from present housing and the 1,700 employees at the Business Park as well as new residents. The new community will be designed to Garden Village Principles.

It will provide:

- provide a range of housing to meet local needs, particularly for affordable housing at 30% and potentially for 'key workers';
- create new employment areas on land within the proposed Village and as an extension to Stanmore Business Park thereby providing much needed expansion space and extending employment opportunities in the town;
- Long term stewardship of the village and community
- High quality design to suit the context;
- a significant net gain in the quantity, quality and connectivity of public open space;
- A significant improvement to access to extensive recreational open space and the countryside for existing and future residents; and
- deliver a new area of publicly accessible open space to include Hermitage Ridge providing:
 - informal but managed footpaths creating functional and recreational linkages between Low Town and the country park;
 - interpretation boards on the woodland and ecological features;
 - protection as required to ancient woodland and
 - interpretation boards on The Hermitage caves scheduled monument.

3.30 The proposed site is tied to the location by the existing core of uses and as the land-owner will deliver it, there is no land to buy and hence more flexibility in the type and tenure of housing and the facilities that will be provided to support it. As an Estate, Apley have a long term interest in the community and a strong desire to take a long term interest in delivering the proposed garden community. This provides a basis for the delivery of an exemplary new community.

Deliverability

3.31 The proposals which have been prepared with a strong vision, will be developed in phases, helped by the topography of the site, this will allow areas to have different

characteristics and variety. One of the aims is not to develop a 'generic' housing estate which has no individuality and where the developer sells the land and walks away; the partners at Stanmore will take a long term approach. The promoters are the landowners and they have no allegiance to a housebuilder, they are free to engage specialists and local/regional firms to deliver housing.

- 3.32 Substantial research has already been undertaken including visits to Poundbury and Nansledan communities which are two of the leading and most celebrated Garden Villages in England. Nansledan, currently under construction, delivers 120 homes a year using three regional builders.
- 3.33 The Apley Estate is home to a large number of historic buildings that have been sympathetically restored and put back into use. The understanding for and care of the cultural heritage of Bridgnorth will be evident in the design of Stanmore.
- 3.34 The proposals, which have the support of Bridgnorth Town Council, reflect the principles of the Building Better, Building Beautiful Commission. The architecture will have character, reflecting local styles and not restrictive 'built to a price' principles.
- 3.35 Lord Matthew Taylor is to advise on the Stanmore proposal. He advises Government, Homes England and local authorities, and runs his own consultancy business. Former chair of the National Housing Federation and former President of the National Association of Local Councils, Lord Taylor is an Honorary Member of the RTPI, Visiting Professor of Planning at Plymouth University, and Senior Visiting Fellow at Cambridge University's School of Planning.
- 3.36 In 2015 he developed the 'Garden Village' proposal, which was adopted by the Government as national policy at the March 2016 Budget. Lord Taylor advises a number of Garden Village and Towns projects, including Chairing the Carclaze Garden Village scheme in Cornwall.
- 3.37 In 2011-12 he was asked to lead the Government review of all the planning practice guidance sitting behind the NPPF. This led to his creating the National Planning Practice Guidance suite, replacing all the pre-existing government guidance.
- 3.38 He advised successive governments on planning and housing policy for over a decade. In 2006-8 he conducted the planning and housing policy review "Living Working

Countryside', which laid many of the foundations for the Government's National Planning Policy Framework and Neighbourhood Planning.

- 3.39 The intention is that the proposals for Stanmore will be developed further by the partners and their advisors in conjunction with the expertise of Lord Taylor, which will ensure that a visionary proposal is established that fully meets the Garden Village ambition, such an approach further adds to the case for exceptional circumstances for the Green Belt release.
- 3.40 Overall, the expertise of the team will ensure delivery of a high quality viable scheme, using a delivery model such as that at Nansladden to achieve delivery in the plan period. As landowners and promoters with a long term interest, viability is not affected by matters such as minimum land values that constrain option agreements and the ability to deliver the infrastructure.
- 3.41 Tasley has questions over delivery. Taylor Wimpey have an option to purchase part of the site which can deliver a few hundred houses fronting Ludlow Road. There is no known commitment beyond that. No confirmation of any agreement that the whole scheme can be viably delivered across the landownership under option and the remaining landownership including necessary non-value generating infrastructure. An option arrangement is usually constrained by achieving a minimum land value so there is no guarantee of viability. The bridge, fundamental to the connectivity of the development, will need land outside of both the promoters and highway control.

4. GREEN BELT ASSESSMENT

- 4.1 EDP on behalf of my client, also consider the impact of development at Stanmore on the five purposes of Green Belt using the Council's Green Belt Assessment (2017) and the Green Belt Stage 2 Assessment (2018) as their starting point (their Green Belt Position Note 17 March 2020 is already in front of the Council) . They conclude that, given the size of the site in reality, the function of the site relative to Green Belt Purpose 3 (To assist in safeguarding the countryside from encroachment) actually diminishes in certain areas due to the effect of limited representation of key characteristics of the countryside, urbanising features and recreational access to the wider Green Belt, however, EDP considers that overall the site makes only a 'moderate' contribution to Green Belt Purpose 3 not a 'strong' contribution. Furthermore, of key note is that the site can readily provide defensible, durable boundaries to the west,

south, east and through delivery of Public Open Space and new planting, could reinforce the defensible boundary and buffer to land separating this proposed development from the wider Green Belt to the east. These factors ensure that the site is an isolated parcel of Land with functioning Green Belt buffers.

- 4.2 EDP finds that the overall site performs poorly (weak) against all the NPPF's GB purposes (relative to GB Purpose 1, 2, 4 and 5 with Purpose 3 scoring moderately rather than strongly) and makes a limited contribution to the fundamental purpose of Green Belt, which is to keep land between settlements permanently open. As such, when coupled with the need to deliver new housing growth at the most sustainable locations in the district it should be considered for release from the Green Belt as part of the Local Plan partial review process.
- 4.3 The Stage 2 Assessment 2018 looks at specific sites. EDP has reviewed this and has concluded that there is an 'opportunity area' missing from the study which would consider the Stanmore site as a 'whole'. This scenario would combine Parcels 55, 56, part of 54, 57 and 58 and is not currently considered in the Stage 2 assessment.
- 4.4 Overall, the limited impact on the purposes of Green Belt makes Stanmore a suitable site to remove.

5. COMPENSATORY IMPROVEMENTS

- 5.1 NPPF paragraph 138 says where it has been concluded that it is necessary to release Green Belt land for development, Strategic policy making authorities should set out "*ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*" More guidance on what this means was provided in the Planning Practice Guidance July 2019.
- 5.2 At Stanmore, compensatory improvements bring new and enhanced green infrastructure allowing connect access and habitats. It is proposed to improve the Country Park which can include matters such as footpath improvements, a visitor centre and cafe. Management of access to Hermitage Ridge is proposed through controlled linkages and closing of unofficial routes which will allow biodiversity enhancements and linkages from Bridgnorth to the Country Park. Interpretation boards on the woodland, flora and fauna and Hermitage Caves are proposed. Access can enhanced to the meadow

land between the ridge and Bridgnorth. These all bring compensatory improvements on land in the control of my clients or that can be delivered by financial contribution.

6. CONCLUSION

- 6.1 In conclusion, there is a need to find land to meet the unmet housing and employment need. It cannot be met on brownfield sites; it cannot be met through increased density on existing allocations; and there is no opportunity for cross boundary locations. The need therefore has to be met from land around the edges of Bridgnorth. There is no test of last resort where Green Belt is only released if there are no other sites outside Green Belt, the test is what is the best and most sustainable way to meet the need for Bridgnorth.
- 6.2 As the need for growth is driven by employment, to allow the second largest of 5 market towns to reach its potential to attract inward investment into Shropshire and to trade into the larger markets of the conurbation, with the emphasis on the provision of good quality employment land to provide a long term benefit, a site should be located to the east of Bridgnorth, where it can serve existing, successful businesses. The east of the town is better connected to the larger markets of the conurbation and the existing employment base of the town. The need for existing business to grow underpins the growth agenda and as such, development located close to existing business at Stanmore Business Park is the best location to meet the need.
- 6.3 The location at Stanmore is well contained in the landscape. The landscape character is flat to gently rolling lowland agricultural farmland with mature hedgerows and trees that limit the potential visual envelope. Existing built form is screened by landform, woodland and field boundary vegetation, reducing intervisibility. This is superior to other areas around the town, notably the land south of the bypass at Tasley which is far more expansive in the landscape, in a larger valley where the impact of development would change the nature of the valley to a greater degree.
- 6.4 Development to the east has a lesser traffic impact on the town. It is more easily accessible to the employment areas of the town and the higher order services beyond the town in the conurbation. It has less impact on the town than development to the south that places 75% of traffic generated on the bypass heading east. From the Stanmore land to the east, linkages to the town can be achieved via an existing footpath and an existing clearing under low voltage overhead power lines passing through

the woodland, all on land controlled by the promoters. If any areas of heightened sensitivity were discovered, sections of raised path would greatly reduce any impact. Compared to land south of the bypass at Tasley where the promoter has no control of road frontage on the bypass, not enough land control to provide a bridge linkage and would initially rely on a single crossing at grade over a bypass with national speed limit.

- 6.5 Stanmore Garden Village is designed to be special, an exemplar to be built to fulfil garden village principles, by small and medium sized housebuilders with a reputation for a high quality product. The employment provision will be by a long-established development company which has owned and run the adjacent business park for nearly 60 years. The promoters are the landowners who have the ability and desire to carry forward long term stewardship, guided by national expert Lord Matthew Taylor. As the landowner, viability is not affected by matters such as minimum land values that constrain option agreements and the ability to deliver the infrastructure. At Tasley, there are questions over the ability to deliver a community with infrastructure as there is no confirmation of viability having regard to option minimum values and delivery of non-value generating infrastructure across landownerships. Plus, the essential bridge connection being within the control of the promoters.
- 6.6 In Green Belt assessment, Stanmore performs poorly (weak) against all of the NPPF's five purposes of Green Belt (relative to Green Belt Purpose 1, 2, 4 and 5 with Purpose 3 scoring moderately rather than strongly) and makes a limited contribution to the fundamental purpose of Green Belt, which is to keep land between settlements permanently open. Overall, the limited impact on Green Belt purposes makes it a suitable site to remove.
- 6.7 Having fully examined the alternatives, it is these matters that demonstrate the location to best meet the needs of Bridgnorth is to the east at Stanmore and exceptional circumstances exist to justify changes to the Green Belt boundaries to allocate the proposed Stanmore Garden Village.

Enclosure - Leading Counsel Opinion 17 June 2020

**Enclosure - Leading Counsel Opinion
17 June 2020**

**IN THE MATTER OF THE SHROPSHIRE LOCAL
PLAN REVIEW PROCESS**

**STANMORE GARDEN VILLAGE, BRIDGNORTH,
SHROPSHIRE**

OPINION

No5
CHAMBERS
BIRMINGHAM • LONDON • BRISTOL

Introduction

1. In this matter I am instructed by Stansgate Planning on behalf of Stanmore Consortium (hereinafter “Stanmore”) in respect of a garden village proposal which is a proposed allocation in the emerging Shropshire Local Plan Review (hereinafter “SLPR”) process.
2. The local planning authority is Shropshire Council (hereinafter “the Council”).
3. The Stanmore Garden Village site is located to the east of Bridgnorth, which is the third largest settlement in the local authority area. It is located within the West Midlands Green Belt.
4. To date there have been four rounds of consultation in respect of the SLPR. These were:
 - Issues and Strategic Options consultation (Jan 2017)
 - Preferred Scale and Distribution of Development consultation (October 2017).
 - Preferred Sites Consultation (November 2018); and
 - Preferred Strategic Sites Consultation (July 2019).
5. Stanmore’s proposal was favoured by the Council until relatively recently. But the Council planning officers in April this year , started to favour another proposal on the western side of Bridgnorth, known as Tasley Garden Village. This was not previous promoted through the consultation process.
6. The Tasley proposal is promoted by Taylor Wimpey. It is a housing led proposal, which includes 16 hectares of employment land and open space. It is described as a new garden settlement. But appears from the plans to be an urban extension.
7. I have visited both sites and the surrounding areas. I have also visited the various parts of the town centre which are located either side of the River Severn, and the main employment areas of Bridgnorth.

Advice Sought

8. For the Council, a key reason for apparently now favouring the Tasley proposal is it is not located in Green Belt. I am aware the Council’s planning officers have raised concerns

about proposal in the Green Belt because paragraphs 136 to 138 of the NPPF. These read:

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

137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

ADVICE

9. It is to be noted from the outset that the Council has selected some sites in the Green Belt as proposed allocations. As such, the Council itself plainly does not see it as an impediment to the allocation of such land.

10. There is no embargo on the release of land for housing or any other form of development in the Green Belt. Instead there is a test which requires the Council to show there are exceptional circumstances: NPPF (2019) paragraph 136.

11. Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt: **Carpets of Worth Ltd v Wyre Forest District Council** [1991] 62 P&CR 334 endorsed in the context of the NPPF in **Gallagher Homes v Solihull Metropolitan BC** [2014] EWHC 1283 at paragraph 125.
12. Each case is fact sensitive and the question of whether circumstances are exceptional requires an exercise of planning judgement: **Gallagher Homes v Solihull Metropolitan BC** [2014] EWHC 1283 at paragraph 125.
13. If a Green Belt boundary is changed then exceptional circumstances need to be demonstrated and the reasons given need to be explained: **Aireborough Neighbourhood Development Plan Forum v Leeds City Council and Secretary of State for HCLG** [2020] EWHC 1461
14. “Exceptional circumstances” is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires “very special circumstances.” **R (Luton BC) v Central Bedfordshire Council** [2015] EWCA Civ 537 as per Sales LJ at paragraph 56.
15. There is no definition of the policy concept of “exceptional circumstances”. This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case: **Calverton Parish Council v Nottingham City Council** [2015] EWHC 1078 as per Jay J at paragraph 20.
16. The concept of exceptional circumstances is deliberately broad, and not susceptible to dictionary definition: **Compton PC v Guildford BC and Others** [2019] as per Ouseley J at paragraph 68.
17. A range of relevant factors which may amount to exceptional circumstances was set out by Jay J in **Calverton Parish Council v Nottingham City Council** [2015] EWHC 1078.
18. But as Ouseley J pointed out in the **Compton PC v Guildford BC and Others** [2019] at paragraph 72, the way in which the issue should be approached as described by Jay J was perhaps a counsel of perfection; but it is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable infrastructure:

19. The High Court has very recently urged caution against attempts to try and define exceptional circumstances. As Ouseley J put in the **Compton PC v Guildford BC and Others** [2019] “*There is however a danger of the simple question of whether there are “exceptional circumstances” being judicially over-analysed.*”
20. Critically, there is no requirement that Green Belt land be released as a last resort: **IM Properties Development Ltd v Lichfield DC** [2014] EWHC 2240 as per Paterson J at paragraphs 90-91 and 95-96.
21. Exceptional circumstances can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary: **Compton PC v Guildford BC and Others** [2019] as per Ouseley J at paragraph 71.
22. But also, and critically, the phrase exceptional circumstances does not require more than one individual “exceptional circumstance”: **Compton PC v Guildford BC and Others** [2019] as per Ouseley J at paragraph 68.
23. General planning needs, such as ordinary housing, are not precluded from the scope of exceptional circumstances. Indeed, meeting such needs is often part of the judgment that “exceptional circumstances” exist. The phrase is not limited to some unusual form of housing, nor to a particular intensity of need: **Compton PC v Guildford BC and Others** [2019] as per Ouseley J at paragraph 72 and 73.
24. There is no reason why ordinary housing need cannot weigh heavily or decisively in favour of showing there are exceptional circumstances: **Compton PC v Guildford BC and Others** [2019] as per Ouseley J at paragraph 72
25. The most that can be said about ordinary housing need amounting, on its own, to exceptional circumstances is that it is simply not necessarily sufficient of itself: **Compton PC v Guildford BC and Others** [2019] as per Ouseley J at paragraph 72
26. Ordinary housing need does not exist in a vacuum or by themselves: there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy: **Compton PC v Guildford BC and Others** [2019] as per Ouseley J at paragraph 72.

27. It follows from the review of the case law above, that any local planning authority is perfectly entitled to allocate land for housing and/or other uses in the Green Belt. Indeed, that is what the Council are already doing. What is required is to set out the reasons why there are exceptional circumstances for doing so. Plainly the use of PDL is one key area where exceptional circumstances are made out.
28. But as the Guildford case demonstrates, housing need is of itself sufficient to amount of exceptional circumstances. In truth, it is more likely that housing need forms part of a range of factors, especially in an authority area where there are large areas of land outwith the Green Belt. Ensuring an adequate geographical distribution of housing sites across the plan area or locating more housing in areas of high demand or poor affordability ratios would all be legitimate planning reasons for allocating housing land in the Green Belt. The first point is addressed by Ouseley in the **Compton PC v Guildford BC and Others** when he refers to an LPA “**achieving a sound spatial distribution strategy.**”
29. Other sound planning reasons for allocating housing sites in the Green Belt would include selecting sites which are in sustainable locations, sites close to major areas of employment or sites with less landscape and visual impact. These are all factors which would come under what Ouseley J described in **Compton PC v Guildford BC and Others** as “other advantages the proposed locations.”
30. The latter issue of landscape and visual impact was very recently relied upon by the Secretary of State for Transport in his decision of 4 May 2020 to allow the West Midlands Strategic Rail Freight Interchange Development Consent Order (hereinafter “DCO”). The DCO site is in the West Midlands Green Belt in the neighbouring county of Staffordshire. The DCO was granted despite an alternative site being identified for the development on a non-Green Belt site at Penkridge. One of the main reasons why that non-Green Belt alternative was rejected was because of the landscape and visual impact.
31. In the context of NPPF paragraph 138, there is a requirement that “**[b]efore concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.**” But that does not mean, it has to carry out some kind of exhaustive search of sites outside the Green Belt. The test is requires that the LPA can demonstrate it has fully examined all other reasonable options. An LPA is perfectly entitled to decide to meet its housing need by allocating housing around settlements in the Green Belt for a variety of

planning reasons, such as those listed above. So long as those reasons are set out clearly, there is no need to look at all non-Green Belt land to meet that need.

32. Turning to the specific of the Stanmore and Tasley proposals, it seems abundantly clear that the Stanmore proposal is far better located to major areas of employment.

33. It is also clear that the Tasley proposal is far more expansive within the landscape. Both sites sit in greenfield valleys on the edge of Bridgnorth beyond the existing bowl. But the Tasley proposal sits in a much larger valley and would therefore change the nature of that valley to a much more extensive degree. Added to which, the Tasley proposal extends into what might be described as deep countryside. Its edges brush close to the valley bottom, populated by very occasional houses and hamlets. In contrast, the outer edge of the Stanmore proposal is enveloped to a large extent by an extensive existing employment site.

34. Therefore, despite both sites being located on the edge of Bridgnorth, the difference in the landscape and visual impact of the two proposals is chalk and cheese.

35. These matters in themselves amount to 'exceptional circumstances'.

36. Moreover, the Bridgnorth Town Council has now come out in favour of the Stanmore proposal. They will know their local area. And so the proximity to major employment and landscape and visual impact will not have been lost on the town councillors, when they made their decision to favour the Stanmore proposal.

37. I trust I have dealt with all the matters raised by my instructing consultant, but needless to say, please contact me if there are any other matters arising.

17 June 2020

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**IN THE MATTER OF THE
SHROPSHIRE LOCAL
PLAN REVIEW PRO-
CESS**

**STANMORE GARDEN
VILLAGE,
BRIDGNORTH,
SHROPSHIRE**

OPINION



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