

# Shropshire Local Plan

## Green Belt Topic Paper

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## 2. Introduction

### *Interim Findings*

- 2.1. On 15<sup>th</sup> February 2023, the Planning Inspectors examining the draft Shropshire Local Plan issued an Interim Findings document (ID28). This followed the completion of the Stage 1 Hearing Sessions, which focused on legal and strategic issues (including strategic policies). These Hearing Sessions were primarily undertaken in July 2022, with a further session specifically regarding the Duty to Cooperate in January 2023.
- 2.2. Within ID28, the Planning Inspectors requested a further Green Belt Topic Paper to document the exceptional circumstances for releasing Green Belt to meet Shropshire needs and separately the exceptional circumstances for releasing Green Belt to accommodate any of the proposed contributions to the housing and employment needs forecast to arise within the Black Country.
- 2.3. Specifically, paragraph 23 of ID28 stated *“Given the Council were planning on releasing Green Belt land to meet its own needs, it seems unlikely that the unmet needs of the Black Country could be met without the release of Green Belt land. Can the Council please provide a revised Green Belt Topic Paper setting out the exceptional circumstances for releasing Green Belt land to meet its own needs and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.”*

### ***Purpose of this Document***

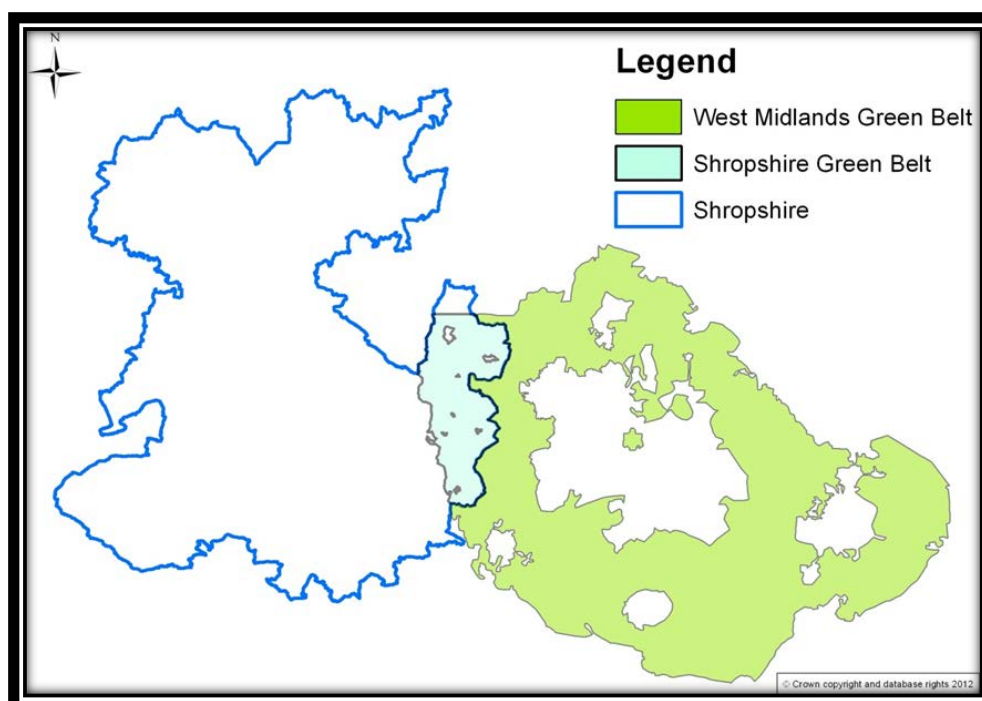
- 2.4. The purpose of this document is to summarise the exceptional circumstances identified for releasing Green Belt to meet Shropshire housing and employment land needs and identify the exceptional circumstances for releasing Green Belt to accommodate any of the proposed contributions to the housing and employment needs forecast to arise within the Black Country.
- 2.5. Importantly and in order to avoid duplication, this document seeks to summarise and heavily cross-references the extensive evidence base prepared to support the draft Shropshire Local Plan in the context of proposed Green Belt release. In particular the:
  - a. Green Belt Assessment (EV049.01-EV049.02).
  - b. Green Belt Review (EV050.01-EV050.08).
  - c. Green Belt Revised Exceptional Circumstances Statement (EV051).
  - d. Initial Green Belt Topic Paper (GC4g).
  - e. Housing Topic Paper (GC4i).
  - f. Employment Strategy Topic Paper (GC4n).

- 2.6. This Topic Paper has also been directly informed by other work and associated conclusions resulting from ID28. In particular with regard to the proposed housing and employment land requirements and the strategic distribution of development, which together form the basis for the proposed spatial strategy within the draft Shropshire Local Plan. Another important conclusion relevant to this Topic Paper is the site assessment work undertaken to identify the sites considered appropriate to accommodate proposed contributions to the unmet need forecast to arise within the Black Country.
- 2.7. Relevant documents which address these issues include:
- a. The Additional Sustainability Appraisal (SA) Assessment.
  - b. The Housing and Employment Topic Paper.

### 3. Green Belt in Shropshire

- 3.1. The Green Belt in Shropshire lies in the south-east of the County, to the east of the River Severn and south of the A5. It forms part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry. Figure 3.1 shows the general location and extent of the West Midlands Green Belt.

**Figure 3.1: General Location and Extent of the West Midlands Green Belt**



- 3.2. Further information on the Green Belt in Shropshire is provided within paragraphs 1.2-1.13 of the Green Belt Revised Exceptional Circumstances Statement (EV051) and paragraphs 2.1-2.6 of the initial Green Belt Topic Paper (GC4g).

## 4. Background

### *National Policy*

- 4.1. The National Planning Policy Framework (NPPF) provides information on the overall importance of Green Belts; their characteristics and purposes; and the conditions needed to justify alterations to existing Green Belt boundaries. This is comprehensively summarised within paragraphs 3.1-3.7 of the Green Belt Revised Exceptional Circumstances Statement (EV051)<sup>1</sup> and paragraphs 3.1-3.6 of the initial Green Belt Topic Paper (GC4g).

### *The Need for a Green Belt Review*

- 4.2. The adopted Development Plan includes a commitment to undertake a Green Belt Review to inform the next review of the Local Plan. This is explained in detail within paragraphs 6.1-6.9 of the initial Green Belt Topic Paper (GC4g).

### *Green Belt Assessment and Review*

- 4.3. Responding to the commitment to undertake a Green Belt Review, important components of the evidence base prepared to inform the draft Shropshire Local Plan are the Green Belt Assessment (EV049.01-EV049.02) and Green Belt Review (EV050.01-EV050.08).
- 4.4. An effective summary of these evidence base documents is provided within paragraphs 7.1-7.32 of the initial Green Belt Topic Paper (GC4g). The Green Belt Revised Exceptional Circumstances Statement (EV051) provides information on these evidence base documents and how they informed the identification of proposed site allocations, on a settlement by settlement basis (including paragraphs 5.20-5.28 (Albrighton); 6.12-6.22 (Alveley); 7.41-7.48 (Bridgnorth); and 8.45-8.53 (Shifnal).

### *The Proposed Spatial Strategy*

- 4.5. The proposed spatial strategy for Shropshire within the draft Shropshire Local Plan has been confirmed through the additional Sustainability Appraisal work and the Housing and Employment Topic Paper prepared in response to ID28.

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<sup>1</sup> Please Note: The NPPF has been updated since the Green Belt Revised Exceptional Circumstances Statement (EV051) was prepared. As such paragraph referencing is not consistent with the latest version of the NPPF. However, the principles remain the same.

- 4.6. The proposed spatial strategy is underpinned by the principles of 'high growth' and 'urban focus'.
- 4.7. 'High growth' consists of a significant uplift above local housing and employment needs in order to contribute to the achievement of wider objectives. It also includes a specific contribution of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise in the Black Country.
- 4.8. 'Urban focus' means that the majority of development is directed towards urban areas, which consist of the proposed Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements. These settlements have the most extensive range of services, facilities and infrastructure to support new development.
- 4.9. However, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in 'urban areas' will be complemented by appropriate new development within Community Hubs, which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or enhance their sustainability. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.
- 4.10. A comprehensive summary of the development and content of the proposed spatial strategy is provided within the Housing Topic Paper (GN4i), the Strategic Employment Topic Paper (GC4n), and the new Housing and Employment Topic Paper.
- 4.11. The proposed spatial strategy constituted the starting point for determining the role and levels of development necessary and appropriate within settlements across Shropshire. This then informed decisions regarding potential site allocations. This process is effectively summarised within the diagram in Chapter 5 of the initial Green Belt Topic Paper (GC4g).

***Sites to Accommodate Proposed Contributions to Unmet Needs Forecast to Arise in the Black Country***

- 4.12. Within ID28, the Planning Inspectors concluded that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country. This should be informed by additional SA and site assessment work.

- 4.13. Specifically, paragraph 21 of ID28 states “...the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.”
- 4.14. Consistent with this conclusion, Shropshire Council has undertaken additional SA and site assessment work, as summarised within the Additional SA Assessment. Through this work, four sites have been identified to accommodate the proposed contributions to the unmet needs forecast to arise within the Black Country.
- 4.15. It is considered that accommodating the proposed contributions upon these sites represents sustainable development and will contribute to the achievement of the proposed spatial strategy within the draft Shropshire Local Plan. Further information on the process undertaken and the conclusions reached is provided within the Additional SA Assessment.
- 4.16. These sites and whether they require Green Belt release to allow for their development is summarised within Table 4.1:

**Table 4.1: Sites Identified to Accommodate the Proposed Contributions to the Unmet Needs Forecast to Arise in the Black Country**

Site Name	Total Capacity	Black Country Contribution	Green Belt Release Required
Tasley Garden Village, Bridgnorth (BRD030)	1,050 dwellings 16ha employment land New local centre and other infrastructure	600 dwellings	No
Land east of Shifnal Industrial Estate, Shifnal (SHF018b & SHF018d)	39 hectares employment land (15.6ha net development)	30ha of employment land	Yes
Land between Mytton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 & SHR161)	1,500 dwellings 5ha of employment land New local centre and other infrastructure	300 dwellings	No
Former Ironbridge Power Station	1,000 dwellings 6ha of employment land New local centre and other infrastructure	600 dwellings	No

- 4.17. It is apparent from Table 4.1 that only one of the proposed site allocations identified to accommodate the proposed contributions to the unmet needs forecast to arise within the Black Country is located within the Green Belt – SHF018b & SHF018d.
- 4.18. SHF018b & SHF018d has been identified to accommodate the entirety of the proposed 30ha contribution towards the unmet employment land needs forecast to arise within the Black Country.



## 5. Green Belt Release Proposed within the draft Shropshire Local Plan

### Overview

5.1. Table 5.1 provides a succinct summary of the Green Belt release proposed within the draft Shropshire Local Plan. This is presented as hectares of land and number of sites by both location and type.

**Table 5.1: Green Belt Release by Location and Type**

Location	Housing		Mixed Use		Employment		Safeguarded Land		Total	
	Ha	Sites	Ha	Sites	Ha	Sites	Ha	Sites	Ha	Sites
Albrighton	-	-	-	-	-	-	19.9	3	<b>19.9</b>	<b>3</b>
Alveley	1.4	1	2.4	1	-	-	3.6	1	<b>7.4</b>	<b>3</b>
Shifnal	-	-	-	-	39.0	1	82.4*	5*	<b>121.4</b>	<b>6</b>
Stanmore (Bridgnorth)	-	-	-	-	11.4	2	-	-	<b>11.4</b>	<b>2</b>
<b>Total</b>	<b>1.4</b>	<b>1</b>	<b>2.4</b>	<b>1</b>	<b>50.4</b>	<b>3</b>	<b>105.9</b>	<b>9</b>	<b>160.1</b>	<b>14</b>

*\*A further 10.4ha of safeguarded land which was previously removed from the Green Belt is located at Shifnal on the site identified as 'Land between Revells Rough, Lamledge Lane and the eastern rail line' which consists of part of SHF023.*

5.2. It is important to note that Table 5.1 reflects the conclusions reached by the Planning Inspectors, as summarised within ID28, with regard to the RAF Cosford site.

5.3. Specifically, within ID28 the Planning Inspectors' concluded that exceptional circumstances did not exist to justify the proposed release of the RAF Cosford site from the Green Belt. ID28 explains in paragraphs 29-32 that this conclusion has been informed by three key factors:

- a. The numerous and complementary uses occurring on the site can, based on past activity at the site, occur whilst the site remains in the Green Belt.
- b. The potential harm to the openness of the surrounding Green Belt if undeveloped land within the site is developed.
- c. The reduced ability to control future non-military use on the site if it is removed from the Green Belt.

5.4. It is also important to note that Table 5.1 reflects the conclusions reached by Shropshire Council following the completion of the additional work requested by the Planning Inspectors within ID28, in

particular with regard to the housing and employment land requirements and the strategic distribution of development, which together form the basis for the proposed spatial strategy within the draft Shropshire Local Plan.

- 5.5. For context, according to the 2021/22 Green Belt Statistics released by the Department for Levelling Up, Housing & Communities (DLUHC)<sup>2</sup>, there were 24,500ha of land designated as Green Belt in Shropshire at 31<sup>st</sup> March 2022. As such, the proposed releases totals around 6.5% of the total Green Belt in Shropshire.
- 5.6. It is apparent from Table 5.1 that 6 of the 14 sites proposed to be removed from the Green Belt, which constitutes 66.2% of the Green Belt release proposed within the draft Shropshire Local Plan, is in order to 'safeguard' land for future development.
- 5.7. Of the remaining proposed Green Belt releases, 3 sites equating to 31.5% of the total hectareage is for employment development; whilst just 2 sites equating to 2.4% of the total hectareage is for residential or residential-led mixed use development.

### ***Assessment of Reasonable Alternatives***

- 5.8. In determining an appropriate proposed spatial strategy and identifying appropriate proposed site allocations there was a careful consideration of reasonable alternatives.
- 5.9. Such consideration represents an important component of plan making. The Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.22) and the additional Sustainability Appraisal Assessment work undertaken provide an effective summary of the consideration of reasonable alternatives.
- 5.10. Consistent with paragraph 141 of the NPPF, the assessment of reasonable alternatives is also an important part of the process of determining whether Green Belt release is appropriate. Specifically, paragraph 141 states *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policymaking authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development..."*
- 5.11. In so doing, consideration should be given to whether the plan "...a) *makes as much use as possible of suitable brownfield sites and*

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<sup>2</sup> DLUHC (2022), <https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2021-to-2022>

*underutilised land; b) optimises the density of development...; and c) has been informed by discussions with neighbouring authorities..."*

- 5.12. Consistent with this requirement, before concluding that exceptional circumstances exist to justify the release of any site from the Green Belt, Shropshire Council comprehensively considered alternative options.
- 5.13. This is documented on a settlement by settlement basis, in a manner that is responsive to the requirements of paragraph 141 of the NPPF, within the Green Belt Revised Exceptional Circumstances Statement (EV051).

### ***Exceptional Circumstances for Proposed Green Belt Releases***

- 5.14. Paragraph 140 of the NPPF states "*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans...*" This paragraph goes on to state "*...where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through nonstrategic policies, including neighbourhood plans.*"
- 5.15. The following sections of this Topic Paper summarise the Exceptional Circumstances for the Green Belt releases proposed within the draft Shropshire Local Plan.
- 5.16. The presentation of these exceptional circumstances is undertaken on a settlement by settlement basis, as the role of each settlement within the proposed spatial strategy is an important component of the exceptional circumstances justification for all sites.

#### *Meeting Shropshire Housing and Employment Land Needs*

- 5.17. Where a settlement includes Green Belt release to meet Shropshire housing and employment land needs the Green Belt Revised Exceptional Circumstances Statement (EV051) and the initial Green Belt Topic Paper (GC4g) already provides a comprehensive explanation of the exceptional circumstances identified.
- 5.18. As such, this Topic Paper provides a high-level summary and should be read alongside the Green Belt Revised Exceptional Circumstances Statement (EV051) and the initial Green Belt Topic Paper (GC4g).

#### *Accommodating Contributions to the Unmet Needs Forecast to Arise in the Black Country*

- 5.19. Where a settlement also includes Green Belt release to accommodate part of the proposed contribution to the unmet needs forecast to arise within the Black Country (as documented within Section 6 of this Topic Paper, this only applies to Shifnal) a clear distinction is

drawn between the exceptional circumstances which apply to meet Shropshire housing and employment land needs and the exceptional circumstances which apply to accommodate part of the proposed contribution to the unmet needs forecast to arise within the Black Country.

#### *The Role of Safeguarded Land*

- 5.20. As already documented within paragraph 5.6 above, the vast majority of the land proposed to be released from the Green Belt within the draft Shropshire Local Plan is to be 'safeguarded' for future development. This land is associated with the settlements of Alveley, Albrighton and Shifnal.
- 5.21. This land is not allocated for development within the draft Shropshire Local Plan, rather it is removed from the Green Belt and 'safeguarded' from development, so that it can provide future development opportunities beyond the time period addressed within the draft Shropshire Local Plan.
- 5.22. Consistent with paragraph 143(d) of the NPPF, "*planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development*". In effect safeguarded land should only be developed once allocated for development within a future Local Plan.
- 5.23. Such land is therefore not intended to be developed in order to achieve the proposed vision, objectives and spatial strategy within the draft Shropshire Local Plan. However, the release of such land is considered important in order to provide future development opportunities and ensure the long term sustainability of the associated settlements and their communities.
- 5.24. At this time, it is expected that any future development on the 'safeguarded' land (which should only occur once it is allocated for development within a future Local Plan) would be to meet the needs of Shropshire. The exceptional circumstances identified within the Green Belt Revised Exceptional Circumstances Statement (EV051) and summarised within this Topic Paper reflect this position.

## **6. Albrighton**

### ***Introduction***

- 6.1. Albrighton is a large urban village located within the M54/A5 corridor, a key road and rail transport corridor, linking Shropshire to the West Midlands. It is inset within the West Midlands Metropolitan Green Belt, meaning it is surrounded by Green Belt (with the exception of

an area of land on the eastern edge of the settlement which was previously removed from the Green Belt and safeguarded for future development).

- 6.2. Within the draft Shropshire Local Plan, Albrighton is proposed to be identified as a Key Centre (this is in effect a continuation of the role that the settlement plays within the adopted Development Plan).
- 6.3. Reflecting on the wider proposed spatial strategy, the role of Albrighton within this spatial strategy and in east Shropshire, constraints present, and identified issues and opportunities; draft Policy S1.1 of the draft Shropshire Local Plan which establishes the proposed settlement strategy for Albrighton proposes to deliver *“around 500 dwellings and around 5 hectares of employment development.”* It also indicates that *“New housing and employment development will respond to local needs.”*
- 6.4. The proposed settlement strategy seeks to support Albrighton’s long-term sustainability and ensure that local housing and employment need is achieved, whilst also respecting the settlement’s location in the Green Belt and other known constraints.

### ***Green Belt Release Proposed***

- 6.5. Having reflected on the proposed spatial strategy, the strategic role of the settlement, known development constraints, identified issues and opportunities, and having reviewed the site promotions received within the settlement, the draft Shropshire Local Plan proposes that in Albrighton:
  - a. New residential development will primarily be delivered through existing commitments (including the proposed ‘saved’ SAMDev Plan allocations which now either benefit from Planning Permission or are subject to a current Planning Application) and a further residential allocation (ALB017 & ALB021), consisting of the remaining safeguarded land to the east of the settlement. This will be complemented by any appropriate small-scale windfall residential development within the Albrighton development boundary and appropriate exception development.
  - b. New employment development will primarily be delivered at the nearby RAF Cosford major developed sites. This will be complemented by appropriate small-scale windfall employment development within the Albrighton development boundary shown on the draft Policies Map, where it is consistent with relevant policies of this Local Plan.

6.6. **As such, for the avoidance of doubt, no land is proposed to be removed from the Green Belt at Albrighton in order to achieve the proposed settlement strategy for the settlement or the proposed spatial strategy for Shropshire within the draft Shropshire Local Plan.**

6.7. However, it is recognised that the proposed allocations within the draft Shropshire Local Plan will exhaust the supply of safeguarded land that exists around the settlement.

6.8. As such, 3 areas of land totalling some 19.9ha are proposed to be removed from the Green Belt and 'safeguarded' for future development (ALB014, P32a and part of P35). Further information on these areas is provided within paragraph 5.19 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

### ***Accommodating Proposed Contributions to the Unmet Needs Forecast to Arise Within the Black Country***

6.9. Albrighton was identified as one location where it may be appropriate to accommodate all or part of the proposed contribution to the unmet needs forecast to arise within the Black Country.

6.10. This was informed by a comprehensive consideration of the functional relationship between the Black Country and sub-geographies within Shropshire, as summarised within the additional Sustainability Appraisal assessment work.

6.11. This conclusion was reached as Albrighton is located in east Shropshire and has a functional relationship to the Black Country. It also benefits from strong road links to the Black Country via the M54/A5 corridor and the Shrewsbury-Wolverhampton Railway line.

6.12. Whilst proximity and connectivity to the Black Country could suggest that Albrighton is an appropriate location to meet cross-boundary needs arising in the Black Country, due to the settlement's size and role within the proposed spatial strategy, it is unlikely that it could make a significant contribution.

6.13. Through the additional SA and site assessment work, it was ultimately concluded that there were more appropriate locations and sites upon which to accommodate proposed contributions to the unmet needs forecast to arise within the Black Country.

6.14. It is considered that accommodating the proposed contribution to the Black Country in these alternative locations and on these alternative sites will contribute to the achievement of the wider spatial strategy for Shropshire.

### ***Assessment of All Other Reasonable Alternatives***

- 6.15. Consistent with paragraph 141 of the NPPF, before concluding that exceptional circumstances existed, consideration of all other reasonable alternatives was undertaken. This is comprehensively documented within paragraphs 5.34-5.47 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

### ***Exceptional Circumstances: Green Belt Releases to Contribute to Meeting Shropshire Housing and Employment Land Needs***

- 6.16. It is considered that there are a number of exceptional circumstances which support the proposed release of 3 areas of land from the Green Belt at Albrighton, to be 'safeguarded' for future development beyond the draft Shropshire Local Plan period.
- 6.17. **These are comprehensively documented within paragraphs 5.48-5.63 of the Green Belt Revised Exceptional Circumstances Statement (EV051) and paragraphs 8.30-8.37 of the initial Green Belt Topic Paper (GC4g).**
- 6.18. In summary, these exceptional circumstances include:
- a. **Supporting the Role and Function of Albrighton in the Future:**
    - i. Albrighton is a Key Centre in Shropshire and benefits from a highly sustainable location on the M54/A5 strategic road corridor and with a station on the Shrewsbury-Wolverhampton Railway Line.
    - ii. There is a need to ensure future development opportunities in order to support the settlement to continue to effectively perform its role as a Key Centre; ensure the long-term sustainability of its services and facilities; and meet the economic, social and environmental needs of its community and those within its extensive hinterland in the future.
    - iii. This cannot be achieved without providing further safeguarded land. As such, it is considered this represents an exceptional circumstance to justify releasing the land from the Green Belt.
    - iv. This issue is responsive to Paragraph 143c) of the NPPF includes "*When defining Green Belt boundaries, plans should: ... c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; ...*".

**b. Meeting Local Needs in the Future:**

- i. Given the location of Albrighton and its distance from any 'urban area' in a Shropshire context, it is considered that there are limited other locations beyond Albrighton where the economic, social and environmental needs of its community and those of its rural hinterland can be met.
- ii. These needs will, in the future, require additional development beyond that planned for within the draft Shropshire Local Plan.
- iii. This cannot be achieved without providing further safeguarded land. As such, it is considered this represents an exceptional circumstance to justify releasing the land from the Green Belt.
- iv. This issue is again responsive to Paragraph 143c) of the NPPF.

**c. Sustainable Patterns of Development**

- i. Paragraph 142 of the NPPF recognises the need to "...*promote sustainable patterns of development...*" when reviewing Green Belt boundaries. It is considered unsustainable to restrict the potential for new development in Albrighton, beyond the proposed plan period.
- ii. Further safeguarded land in sustainable locations is required in order to provide for development options beyond the proposed plan period. As such, it is considered this represents an exceptional circumstance to justify releasing the land from the Green Belt.

**d. Ensuring Long-Term defensible Green Belt Boundaries**

- i. Paragraph 143e) of the NPPF specifies that "*when defining Green Belt boundaries, plans should... e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period*".
- ii. Given the role and function of Albrighton, it is not considered that this can be achieved without identifying safeguarded land for future development beyond the proposed plan period at the settlement.

**e. Green Belt Performance**

- i. In identifying proposed safeguarded land, the performance against Green Belt purposes and the harm to the remaining Green Belt was given due consideration.
- ii. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.



## ***Site Boundaries and Compensatory Improvements to the Green Belt***

- 6.19. In identifying the three proposed areas of safeguarded land to be removed from the Green Belt, due consideration was given to resultant Green Belt boundaries and the ability to provide for compensatory improvements to the Green Belt. This is consistent with the requirements of paragraphs 142 and 143 of the NPPF.
- 6.20. These matters are addressed within paragraphs 5.64-5.69 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

## **7. Alveley**

### ***Introduction***

- 7.1. Alveley is a large village located to the south-east of Bridgnorth, off the A442. It is inset within the West Midlands Metropolitan Green Belt, meaning it is surrounded by Green Belt.
- 7.2. Within the draft Shropshire Local Plan, Alveley is proposed to be identified as a Community Hub. Community Hubs are considered significant rural service centres, where appropriate new development that complements the proposed 'urban focus' will occur. This development will contribute to the long-term sustainability of rural communities.
- 7.3. Reflecting the proposed spatial strategy and the role of Alveley within it, constraints present, and identified issues and opportunities including the limited development that has occurred in the settlement over recent years; draft Policy S3.2 of the draft Shropshire Local Plan which establishes the proposed settlement strategies for Community Hubs in the Bridgnorth Place Plan Area (including Alveley) proposes to deliver "*around 130 dwellings*".
- 7.4. The proposed settlement strategy seeks to support Alveley's long-term sustainability and ensure that local housing need is achieved, whilst also respecting the settlement's location in the Green Belt and other known constraints.

### ***Green Belt Release Proposed***

- 7.5. Having considered the role of the village as a Community Hub, known development constraints, identified issues and opportunities, and having reviewed the site promotions received, the draft Shropshire Local Plan proposes the following Green Belt release in

Alveley in order to contribute to the achievement of the proposed settlement strategy:

- a. Mixed use allocation with provision for community sports and recreation facilities and around 35 dwellings, at Land north of Daddlebrook Road and West of A442 (ALV006/ALV007).
  - b. Residential allocation with provision for around 35 dwellings, on Land Adjacent to The Cleckars, Alveley (ALV009).
- 7.6. This will be complemented by any appropriate small-scale windfall residential development within the Alveley development boundary and appropriate exception development.
- 7.7. The proposed strategy for Alveley does not include any specific guideline for employment provision, simply acknowledging that if a local need arises it will be delivered through appropriate small-scale windfall employment development within the settlement's development boundary.
- 7.8. **As such, for the avoidance of doubt, two sites are proposed to be removed from the Green Belt in order to contribute to the achievement of the proposed settlement strategy for Alveley and the proposed spatial strategy for Shropshire within the draft Shropshire Local Plan.**
- 7.9. **These sites consist of a residential allocation and a residential-led mixed use allocation.**
- 7.10. It is recognised that to provide longer term development opportunities beyond the period addressed within the draft Shropshire Local Plan and ensure that the Green Belt boundaries will not require further amendment within the next review of the Local Plan, one area of land totalling some 3.6ha (ALV002) is also proposed to be removed from the Green Belt and 'safeguarded' for future development.
- 7.11. Further information on the two proposed site allocations and the proposed area of safeguarded land is provided within paragraphs 6.32-6.36 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

***Accommodating Proposed Contributions to the Unmet Needs Forecast to Arise Within the Black Country***

- 7.12. Alveley was not identified as a location where it may be appropriate to accommodate all or part of the proposed contribution to the unmet needs forecast to arise within the Black Country.

- 7.13. This was informed by a comprehensive consideration of the functional relationship between the Black Country and sub-geographies within Shropshire, as summarised within the additional Sustainability Appraisal assessment work.
- 7.14. Whilst the settlement is located within an area with a functional relationship to the Black Country, it was considered that given the scale and role envisioned for the settlement within the proposed spatial strategy, it would not be appropriate or sustainable to accommodate any of the proposed contribution to unmet needs forecast to arise in the Black Country at Alveley.
- 7.15. It is considered that accommodating the proposed contribution to the Black Country in alternative locations will contribute to the achievement of the wider spatial strategy for Shropshire.

### ***Assessment of All Other Reasonable Alternatives***

- 7.16. Consistent with paragraph 141 of the NPPF, before concluding that exceptional circumstances existed, consideration of all other reasonable alternatives was undertaken. This is comprehensively documented within paragraphs 6.28-6.31 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

### ***Exceptional Circumstances: Green Belt Releases to Contribute to Meeting Shropshire Housing and Employment Land Needs***

- 7.17. It is considered that there are exceptional circumstances which support the proposed release of 2 sites from the Green Belt at Alveley for residential and residential mixed-use development respectively, and the release of 1 area of land from the Green Belt at Alveley to be 'safeguarded' for future development beyond the draft Shropshire Local Plan period.
- 7.18. In summary, these exceptional circumstances include:
- a. Meeting Existing Local Development Needs:**
    - i. Alveley village is a highly performing Community Hub in the settlement hierarchy assessment process, reflecting good access to a number of services and facilities, yet it has had relatively low levels of residential development over many years (notably from 2006-2019). It is considered that this reflects constraints on development opportunities as set out in paragraphs 6.5 and 6.6 and also 6.28 and 6.29 of the Green Belt Revised Exceptional Circumstances Statement (EV051).
    - ii. Evidence also suggested unmet need for local housing, which includes affordable housing and the provision of

accommodation types which are not readily available in the village as set out in para 6.7 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

- iii. In order to ensure long-term rural community sustainability in line with strategic aim of draft Policy SP2, there is an expectation that growth in urban areas will be complemented by appropriate new development within Community Hubs, such as Alveley.
- iv. Given the location of Alveley and its distance from Bridgnorth, the closest town in Shropshire (or other 'urban area'), it is considered that there are local community development needs which are required to be met by development within the settlement itself rather than further afield. This includes opportunities to provide for the development of a range of house types, including smaller lower cost homes, with supporting infrastructure, to help to provide choice and support community sustainability.
- v. The proposed Green Belt releases for two separate site allocations provide for a choice of delivery options in locations which are both well connected to Alveley.
- vi. As such, it is considered this represents an exceptional circumstance to justify releasing the land from the Green Belt.

**b. Meeting Local Needs in the Future:**

- i. Given the location of Alveley and its distance from any 'urban area' in a Shropshire context, it is considered that there are limited other locations beyond Alveley where the local housing and supporting local infrastructure needs of its community can be met.
- ii. The draft Shropshire Local Plan proposes allocations which provide for a for a level of residential development which is relatively modest in housing numbers but of a scale which can be assimilated into the village within the timescale provided for by the draft Shropshire Local Plan. The allocations also provide for additional sports and leisure provision which could support any future growth. However, given that the village is inset in the Green Belt with limited scope for new development within its settlement boundary, residential development needs will, in the future, require additional development beyond that planned for within the draft Shropshire Local Plan.
- iii. This cannot be achieved without providing further safeguarded land. As such, it is considered this represents an exceptional circumstance to justify releasing the land from the Green Belt.

- iv. This issue is also responsive to Paragraph 143c) of the NPPF.
- c. Community benefit of the proposed mixed use allocation:**
- i. Alveley provides a rural service centre within a Green Belt location that lies between the larger settlements of Bridgnorth and Kidderminster (outside Shropshire) which provide the higher-level services and facilities.
  - ii. Bridgnorth, the closest town is about 7 miles away and the Key Centre of Highley, with some services including leisure facilities, is around 1.5 miles away. Although geographically closer the Key Centre of Highley, lies across the River Severn and there is no vehicular access from the Alveley side. Therefore, facilities in Highley are not easily accessible to serve the local needs of Alveley and the associated rural area.
  - iii. The Green Belt Revised Exceptional Circumstances Statement (EV051) sets out that there is scope for additions and improvements to existing leisure facilities and activities to target the needs of a wider range of people so that as many residents as possible have access to appropriate and attractive leisure opportunities within the area.
  - iv. It is intended that the site that has been identified at Daddlebrook Road (Proposed allocation ALV006 /ALV007 in the draft Shropshire Local Plan) which constitutes a residential-led mixed-use allocation would help deliver improved community facilities for sports and recreation, replacing and enhancing the more limited provision that currently exists at Alveley Sports Club. This would be a valuable community benefit which would help to support social sustainability and this forms part of the exceptional circumstances case.
  - v. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.
- d. Supporting the Role and Function of Alveley Now and in the Future:**
- i. Alveley is a proposed Community Hub and as such is considered a significant rural service centre. To ensure that the settlement continues to fulfil its role as a Community Hub and remains sustainable (including by supporting the long-term sustainability of its services and facilities), there is a need for appropriate quantities of the right types, tenures and quality of residential development over the short, medium and long term.

- ii. Such development will also meet the economic, social and environmental needs of Alveley's community and those within its rural hinterland.
- iii. The amount and type of development will in the short and medium term be constrained without providing further site allocations and in the longer term without further safeguarded land. As such, it is considered this represents an exceptional circumstance to justify releasing the land from the Green Belt.
- iv. This issue is also responsive to Paragraph 143c) of the NPPF which includes, "*When defining Green Belt boundaries, plans should:... c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;...*".

**e. Sustainable Patterns of Development**

- i. Paragraph 142 of the NPPF recognises the need to "*...promote sustainable patterns of development...*" when reviewing Green Belt boundaries. It is considered unsustainable to restrict the potential for new development in Alveley, both during and beyond the proposed plan period.
- ii. Further site allocations and safeguarded land in sustainable locations is required in order to provide for development options during and beyond the proposed plan period. As such, it is considered this represents an exceptional circumstance to justify releasing the land from the Green Belt.

**f. Ensuring Long-Term defensible Green Belt Boundaries**

- i. Paragraph 143e) of the NPPF specifies that "*when defining Green Belt boundaries, plans should... e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period*".
- ii. Given the role and function of Alveley, it is not considered that this can be achieved without identifying safeguarded land for future development beyond the proposed plan period at the settlement.

**g. Green Belt Performance**

- i. In identifying proposed allocations and safeguarded land, the performance against Green Belt purposes and the harm to the remaining Green Belt was given due consideration.
- ii. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.

- 7.19. **Further information is provided within the Green Belt Revised Exceptional Circumstances Statement (EV051) and paragraphs 8.30-8.37 of the initial Green Belt Topic Paper (GC4g).**

### ***Site Boundaries and Compensatory Improvements to the Green Belt***

- 7.20. In identifying the three proposed areas of safeguarded land to be removed from the Green Belt, due consideration was given to resultant Green Belt boundaries and the ability to provide for compensatory improvements to the Green Belt. This is consistent with the requirements of paragraphs 142 and 143 of the NPPF.
- 7.21. These matters are addressed within paragraphs 6.37-6.42 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

## **8. Bridgnorth**

### ***Introduction***

- 8.1. Bridgnorth is an attractive market town located in the east of Shropshire on the junction of the A458 and A442. It has an unusual relationship to the West Midlands Green Belt in that the town is not fully inset within the Green Belt, rather it wraps around the eastern built form of the settlement (known as the Low Town).
- 8.2. Stanmore Business Park (formerly known as Stanmore Industrial Estate) is a significant employment site associated with Bridgnorth, located to the east of the Low Town and inset within the Green Belt. It constitutes a 'centre of excellence for engineering and advanced manufacturing' and a key employment location in Shropshire.
- 8.3. Within the draft Shropshire Local Plan, Bridgnorth is proposed to be identified as a Principal Centre (this is in effect a continuation of the role that the settlement plays within the adopted Development Plan).
- 8.4. Reflecting on the wider proposed spatial strategy, the role of Bridgnorth within this spatial strategy and in east Shropshire, constraints present, and identified issues and opportunities; draft Policy S3.1 of the draft Shropshire Local Plan which establishes the settlement strategy for Bridgnorth proposes to deliver "*around 1,800 dwellings*" and make available "*around 49ha of employment land to create choice and competition in the market.*"

- 8.5. It also indicates that *“New housing and employment will make provision for the needs of the town and surrounding hinterland, including attracting inward investment and allowing existing businesses to expand.”*
- 8.6. The proposed settlement strategy seeks to support Bridgnorth’s role as a Principal Centre and strategic focus in east Shropshire; the long-term sustainability of the settlement; ensure that the housing and employment needs of Bridgnorth’s community and those within the wider rural area (including a proportion of the unmet housing need forecast to arise within the Black Country) is achieved; whilst also respecting the settlement’s location relative to the Green Belt and other known constraints.

### ***Green Belt Release Proposed***

- 8.7. Having reflected on the proposed spatial strategy, the strategic role of the town, known development constraints, identified issues and opportunities, and having reviewed the site promotions received within the settlement, the draft Shropshire Local Plan proposes that in Bridgnorth:
- a. New residential development will be delivered through:
    - i. Existing commitments (including proposed saved SAMDev Plan allocations which are the subject of a current Planning Application with a resolution to grant Planning Permission).
    - ii. A further significant mixed-use sustainable urban extension allocation (BRD030) which is located outside of the Green Belt.
    - iii. Complementary small-scale windfall residential development considered appropriate within the town’s development boundary and appropriate exception development outside town’s development boundary.
  - b. New employment development will be delivered through:
    - i. Existing commitments (including proposed saved SAMDev Plan allocations which are the subject of a current Planning Application with a resolution to grant Planning Permission)<sup>3</sup>.

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<sup>3</sup> Please Note: Around 6.6 hectares of proposed saved SAMDev Plan employment allocations are specifically for the relocation of the existing Livestock Market. These allocations also include substantial areas for landscaping.



- ii. The previously referenced mixed-use sustainable urban extension allocation (BRD030) which is located outside of the Green Belt.
- iii. Two extensions to the successful Stanmore Business Park (P58a and STC002). These extensions total some 11.4ha and comprise land that is currently located within the Green Belt.
- iv. Complementary windfall employment development, where it is considered appropriate and consistent with relevant policies of the Shropshire Local Plan.

**8.8. As such, for the avoidance of doubt, two sites are proposed to be removed from the Green Belt in order to contribute to the achievement of the proposed settlement strategy for Bridgnorth and the proposed spatial strategy for Shropshire within the draft Shropshire Local Plan.**

**8.9. Both these sites are for employment uses and seek to facilitate expansion of the strategically important Stanmore Business Park.**

8.10. Further information on the two sites proposed to be removed from the Green Belt is provided within paragraph 7.39 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

8.11. It is recognised that there is also a need to consider whether longer term development opportunities beyond the period addressed within the draft Shropshire Local Plan exist and to ensure that the Green Belt boundaries will not require further amendment within the next review of the Local Plan.

8.12. Having reflected on this matter, given the unique relationship that Bridgnorth has with the Green Belt, it is considered that sufficient development options exist at the town without the need to identify areas of safeguarded land. This is supported by the identification of a potential future direction of growth associated with the proposed mixed-use sustainable urban extension allocation (BRD030).

### ***Accommodating Proposed Contributions to the Unmet Needs Forecast to Arise Within the Black Country***

8.13. Bridgnorth was identified as one location where it may be appropriate to accommodate all or part of the proposed contribution to the unmet needs forecast to arise within the Black Country.

8.14. This was informed by a comprehensive consideration of the functional relationship between the Black Country and sub-

geographies within Shropshire, as summarised within the additional Sustainability Appraisal assessment work.

- 8.15. This conclusion was reached as Bridgnorth is located in south-east Shropshire and has a functional relationship to the Black Country. It also benefits from strong road links to the Black Country via the A454/A458 corridors.
- 8.16. Through the additional SA and site assessment work, the proposed allocation at Bridgnorth (BRD030) was identified as one site upon which it is considered appropriate to accommodate 600 dwellings of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 8.17. This conclusion was informed by a range of factors, including:
- a. Bridgnorth has a functional relationship to the Black Country and strong road links via the A454 and A458 corridors.
  - b. Bridgnorth is a Principal Centre and performs a strategic role in the east of Shropshire.
  - c. The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development, including a range of house types to meet different needs.
  - d. The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.
  - e. Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt).
  - f. Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.
- 8.18. **Importantly in the context of this Topic Paper, the proposed Sustainable Urban Extension at BRD030 is not located within the Green Belt.**

### ***Assessment of All Other Reasonable Alternatives***

- 8.19. Consistent with paragraph 141 of the NPPF, before concluding that exceptional circumstances existed, consideration of all other reasonable alternatives was undertaken. This is comprehensively documented within paragraphs 7.53-7.65 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

8.20. This is structured around two key components, alternative options to the expansion of Stanmore Business Park and alternative options for the expansion of Stanmore Business Park.

***Exceptional Circumstances: Green Belt Releases to Contribute to Meeting Shropshire Housing and Employment Land Needs***

8.21. It is considered that there are a number of exceptional circumstances which support the proposed release of 2 areas of land from the Green Belt at Stanmore Business Park, Bridgnorth, to be allocated for employment development in order to allow for the expansion of this important employment site, to contribute to the achievement of the proposed settlement strategy for Bridgnorth and to contribute to the proposed spatial strategy for Shropshire within the draft Shropshire Local Plan.

8.22. **These are comprehensively documented within paragraphs 7.66-7.94 of the Green Belt Revised Exceptional Circumstances Statement (EV051) and paragraphs 8.30-8.37 of the initial Green Belt Topic Paper (GC4g).**

8.23. In summary, these exceptional circumstances include:

**a. Supporting the Role of Stanmore Business Park**

- i. Stanmore Business Park represents a 'centre of excellence for engineering and advanced manufacturing', hosting a range of businesses within and associated with engineering and advanced manufacturing that benefit from their co-location on the site<sup>4</sup>.
- ii. The Business Park is a key employment location for Bridgnorth and Shropshire. It also represents a regionally significant site which strongly complements the wider engineering and advanced manufacturing sector in the West Midlands.
- iii. To ensure Stanmore Business Park continues to perform and expand on its role as a 'centre of excellence for engineering and advanced manufacturing', there is a need to provide appropriate opportunities for the expansion of existing businesses and the co-location of other businesses, particularly those within the engineering and advanced manufacturing sector.

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<sup>4</sup> *The Marches Centre for Manufacturing and Technology CIC (MCMT) has now left the Business Park. However, this unit has been granted Planning Permission to facilitate the installation and operation of innovative processing plant to recover high value metals from small end of life electronic equipment. This use is similar in character to 'advanced manufacturing' uses.*

- iv. Given the high-occupancy rates on the site and the limited remaining land for development within the existing site, it is considered critical to provide further opportunities for the expansion of the site in the short, medium and long term in order to allow for this to occur.
  - v. As such, facilitating the expansion of the Business Park in order to ensure that it continues to perform and expand its role as a 'centre of excellence for engineering and advanced manufacturing' is considered an exceptional circumstance that contributes to the justification for the release of the two parcels of land from the Green Belt, specifically for the expansion of the Business Park itself.
- b. Supporting the medium- and long-term needs of existing businesses on Stanmore Business Park**
- i. Stanmore Business Park is host to a significant number of businesses, including a particular concentration within and associated with engineering and advanced manufacturing.
  - ii. In order to support the medium- and long-term needs of the site occupiers', appropriate opportunities are required for any necessary expansion – particularly as the operation from a single site brings many efficiency benefits, to an organisation.
  - iii. Given the high-occupancy rates on the site and the limited remaining land for development within the existing site, it is considered critical to provide further opportunities for the expansion of the site, to allow for the expansion of existing businesses in the medium- and long-term.
  - iv. As such, facilitating expansion of the Business Park to provide opportunities for existing businesses on the site to expand in the medium- and long-term is also considered an exceptional circumstance that contributes to the justification for the release of the two parcels of land from the Green Belt, specifically for the expansion of the Business Park itself.
- c. Attracting new businesses, particularly those in the 'engineering and advanced manufacturing' sector**
- i. As a locally and regionally significant site and a 'centre for excellence for engineering and advanced manufacturing', Stanmore Business Park provides an opportunity to attract other businesses into Shropshire, particularly those in the engineering and advanced manufacturing sectors that will benefit from 'clustering' on the site.
  - ii. Given the high-occupancy rates on the site and the limited remaining land for development within the existing site, to provide opportunities to accommodate new businesses there

is a need to provide further opportunities for the expansion of the site.

- iii. As such, facilitating expansion of the Business Park to provide opportunities to attract new businesses onto the site, which will benefit from the 'cluster' of business within the engineering and advanced manufacturing sectors, is considered an exceptional circumstance that contributes to the justification for the release of the two parcels of land from the Green Belt, specifically for the expansion of the Business Park itself.

**d. Supporting the Strategic Role of Bridgnorth**

- i. Bridgnorth is a Principal Centre and performs a strategic role in the east of Shropshire.
- ii. Within the proposed spatial strategy of the draft Shropshire Local Plan, Bridgnorth constitutes a significant focus for development.
- iii. The two sites proposed for release from the Green Belt would allow for the expansion of Stanmore Business Park, a key location for engineering and advanced manufacturing. This expansion will support the strategic role of the town in east Shropshire by enhancing employment opportunities and in this way contribute to the achievement of the proposed settlement strategy for Bridgnorth and the wider spatial strategy for Shropshire.
- iv. This is considered an exceptional circumstance that contributes to the justification for the release of the two parcels of land from the Green Belt, specifically for the expansion of the Business Park itself.

**e. Supporting the Aspirations of the Economic Growth Strategy for Shropshire and the Marches Local Enterprise Partnership (LEP)**

- i. Advanced manufacturing (including engineering, agri-food and agri-tech) is one of the key growth sectors for the Shropshire economy identified within the Economic Growth Strategy.
- ii. Stanmore Business Park is a key location for engineering and advanced manufacturing within Shropshire and the West Midlands.
- iii. Furthermore, the Marches LEP identifies Bridgnorth as an 'opportunity town' linked to its *"large manufacturing sector with supply chain links into the West Midlands"* within its Strategic Economic Plan (EV109).
- iv. It is considered that facilitating the expansion of Stanmore Business Park, will contribute towards the achievement of the

aspirations of both the Economic Growth Strategy for Shropshire and the Strategic Economic Plan for the Marches.

- v. This is considered an exceptional circumstance that contributes to the justification for the release of the two parcels of land from the Green Belt, specifically for the expansion of the Business Park itself.

**f. Green Belt Performance**

- i. In identifying proposed employment land allocations, the performance against Green Belt purposes and the harm to the remaining Green Belt was given due consideration.
- ii. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.

***Site Boundaries and Compensatory Improvements to the Green Belt***

- 8.24. In identifying the three proposed areas of safeguarded land to be removed from the Green Belt, due consideration was given to resultant Green Belt boundaries and the ability to provide for compensatory improvements to the Green Belt. This is consistent with the requirements of paragraphs 142 and 143 of the NPPF.
- 8.25. These matters are addressed within paragraphs 7.95-7.104 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

## **9. Shifnal**

***Introduction***

- 9.1. Shifnal is a town located on the M54/A5 corridor, a key road and rail transport corridor, linking Shropshire to the West Midlands. The town has experienced significant growth over recent years, much of which has occurred during the period addressed within the draft Shropshire Local Plan.
- 9.2. Shifnal is inset within the West Midlands Metropolitan Green Belt, meaning it is surrounded by Green Belt (with the exception of areas of land on the towns north-eastern and south-eastern edges, which were previously removed from the Green Belt and safeguarded for future development).
- 9.3. Within the draft Shropshire Local Plan, Shifnal is proposed to be identified as a Key Centre (this is in effect a continuation of the role

that the settlement plays within the adopted Development Plan). Indeed, the settlement represents the largest of the proposed Key Centres in Shropshire.

- 9.4. Reflecting on the wider proposed spatial strategy, the role of Shifnal within this spatial strategy and in east Shropshire, constraints present, and identified issues and opportunities; draft Policy S15.1 of the draft Shropshire Local Plan which establishes the proposed spatial strategy for Shifnal proposes that:
- 9.5. *“the town will deliver around 1,500 dwellings and make available around 41 hectares of employment land to provide choice and competition in the market.”* It also indicates that *“New housing and employment will provide for the needs of the town and surrounding hinterland, including attracting inward investment, allowing existing businesses to expand and encouraging new businesses to establish in Shifnal.”*
- 9.6. The nature and scale of development within the proposed settlement strategy is designed to maintain and enhance Shifnal’s role as a Key Centre and ensure that local housing and employment land needs (and a contribution to unmet employment need forecast to arise in the Black Country) are achieved, whilst also respecting the settlement’s location in the Green Belt and other known constraints. It is also responsive to past trends and existing commitments.

### ***Green Belt Release Proposed***

- 9.7. Having reflected on the proposed spatial strategy, the strategic role of the town, known development constraints, identified issues and opportunities, and having reviewed the site promotions received within the settlement, the draft Shropshire Local Plan proposes that in Shifnal:
  - a. New residential development will be delivered through:
    - i. Existing commitments (including proposed saved SAMDev Plan allocations which benefit from Planning Permission).
    - ii. Three further residential allocation (SHF013; SHF015 & SHF029; and SHF022 & SHF023) all of which are located outside of the Green Belt on land that was previously ‘safeguarded’ for future development.
    - iii. Complementary small-scale windfall residential development considered appropriate within the town’s development boundary and appropriate exception development outside town’s development boundary.

- b. New employment development will be delivered through:
- i. A new strategic employment allocation (SHF018b & SHF018d), which due to its size and location will represent a significant new investment opportunity and has the potential to form both a locally and regionally important employment centre.
  - ii. Existing commitments and complementary windfall employment development within the settlement's development boundary, where it is considered appropriate and consistent with relevant policies of the Shropshire Local Plan.
- 9.8. **As such, for the avoidance of doubt, one site is proposed to be removed from the Green Belt in order to contribute to the achievement of the proposed settlement strategy for Shifnal and the proposed spatial strategy for Shropshire within the draft Shropshire Local Plan.**
- 9.9. **This site is for employment uses and seeks to establish a new investment opportunity with the potential to form both a locally and regionally important employment centre.**
- 9.10. It is also recognised that the proposed allocations within the draft Shropshire Local Plan will exhaust much of the remaining supply of safeguarded land that exists around the settlement.
- 9.11. As such, to complement the 1 remaining area of 'safeguarded land' which totals some 10.4ha located at Land between Revells Rough, Lamledge Lane and the eastern rail line (part of SHF023); 5 further areas of land totalling some 82.4ha are proposed to be removed from the Green Belt and 'safeguarded' for future development (SHF018a; P14; SHF019 & part of P15b; part of SHF017 & P16 and another part of SHF017).
- 9.12. Further information on each of the sites proposed to be removed from the Green Belt for employment purposes and to form new areas of 'safeguarded' for future development is provided within paragraph 8.44 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

***Accommodating Proposed Contributions to the Unmet Needs Forecast to Arise Within the Black Country***

- 9.13. Shifnal was identified as one location where it may be appropriate to accommodate all or part of the proposed contribution to the unmet needs forecast to arise within the Black Country.
- 9.14. This was informed by a comprehensive consideration of the functional relationship between the Black Country and sub-



geographies within Shropshire, as summarised within the additional Sustainability Appraisal assessment work.

- 9.15. This conclusion was reached as Shifnal is located in east Shropshire and has a functional relationship to the Black Country. It also benefits from strong road links to the Black Country via the M54/A5 corridor and strong rail links to the Black Country via the Shrewsbury-Wolverhampton railway line.
- 9.16. Through the additional SA and site assessment work, the proposed allocation at Shifnal (SHF018b & SHF018d) was identified as the site upon which it is considered appropriate to accommodate the entirety of the 30ha proposed employment land contribution towards the unmet employment land need forecast to arise in the Black Country.
- 9.17. This conclusion was informed by a range of factors, including:
- a. Shifnal has a functional relationship to the Black Country and strong road and rail links via the M54/A5 corridor and Shrewsbury-Wolverhampton railway line respectively.
  - b. Shifnal is a Key Centre and a focus for investment, employment, housing and development on the M54/A5 strategic corridor.
  - c. The site constitutes a proposed strategic employment allocation which due to its size and location has the potential to form both a local and regionally important employment centre.
  - d. The site can accommodate a sizeable contribution towards the unmet employment land needs forecast to arise in the Black Country.
  - e. Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints. Whilst the site is located within the Green Belt, it is considered that exceptional circumstances exist to justify the release of this land for employment, as documented within this Green Belt Topic Paper.
  - f. Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.
- 9.18. **Importantly in the context of this Topic Paper, the proposed Strategic Employment Allocation SHF018b & SHF018d is currently located within the Green Belt.**

### ***Assessment of All Other Reasonable Alternatives***

- 9.19. Consistent with paragraph 141 of the NPPF, before concluding that exceptional circumstances existed, consideration of all other reasonable alternatives was undertaken. This is comprehensively

documented within paragraphs 8.64-8.87 of the Green Belt Revised Exceptional Circumstances Statement (EV051).

- 9.20. In the context of accommodating the proposed contribution to the unmet employment land need forecast to arise within the Black Country, consideration of all other reasonable alternatives is documented within the additional Sustainability Appraisal assessment work.

***Exceptional Circumstances: Green Belt Releases to Contribute to Meeting Shropshire Housing and Employment Land Needs***

- 9.21. It is considered that there are a number of exceptional circumstances which support the proposed release of 3 areas of land from the Green Belt at Shifnal, to be 'safeguarded' for future development beyond the draft Shropshire Local Plan period.

- 9.22. **These are comprehensively documented within paragraphs 8.88-8.149 of the Green Belt Revised Exceptional Circumstances Statement (EV051) and paragraphs 8.30-8.37 of the initial Green Belt Topic Paper (GC4g).**

- 9.23. In summary, these exceptional circumstances include:

**a. Sustainable Patterns of Development**

- i. Paragraph 142 of the NPPF recognises the need to “...*promote sustainable patterns of development...*” when reviewing Green Belt boundaries. In Shropshire, the Green Belt Review offers the potential to respond to the circumstances, character, needs and opportunities in the east of the County.
- ii. Proposals to release Green Belt land for development seek to achieve the preferred spatial strategy which seeks to deliver an urban focussed distribution of development.
- iii. This has enabled the spatial strategy to focus development opportunities particularly to deliver new employment into the most sustainable settlements in the east of the County.
- iv. This also enables the safeguarding of land to provide options for the future development of these settlements beyond the current plan period, as advised in NPPF paragraph 143(c) “When defining Green Belt boundaries, plans should: ... c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;...”.

- v. These opportunities help to meet the needs of these key communities and their hinterlands during the proposed plan period and into the future.
- vi. This strategy also helps to deliver a 'step change' in the performance and productivity of the Shropshire economy.
- vii. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

**b. Supporting the Role and Function of Shifnal:**

- i. Shifnal is the largest Key Centre in Shropshire and benefits from a highly sustainable location on the M54/A5 strategic road and rail corridor. Shifnal provides a station on the Shrewsbury-Wolverhampton Railway Line in the town and is close to stations in Telford and at Cosford and Albrighton.
- ii. Shifnal performs a key role within the east of the County. Shifnal supports the role of the principal market town at Bridgnorth and complements the function of the adjacent 'built up area' of Telford.
- iii. The strategy for Shifnal should support the role and function of the town as an important Key Centre. This should increase the self-containment and sustainability of the community; ensure the longer-term sustainability of its services and facilities; and deliver housing and employment to meet the needs of the town and other communities in the Green Belt.
- iv. This cannot be achieved without delivering new development opportunities particularly to provide new employment to reduce the 'dormitory' character of the settlement and to deliver new investment in critical infrastructure to continue to meet the needs of the community.
- v. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

**c. Supporting the Community Vitality of Shifnal:**

- i. Shifnal has a lower average age profile than the Shropshire average, but has some sensitivities that affect the robustness of the community particularly a smaller cohort of young people.
- ii. Due to the settlement's location within the Green Belt, past Development Plans have planned for only limited levels of development which have constricted the ability to address identified sensitivities. The adopted Development Plan and draft Shropshire Local Plan seek to redress this imbalance by promoting significant levels of growth with periods of assimilation.

- iii. This provides for progressive growth to improve the vitality of the community with some assimilation of these changes rather than sudden and unexpected growth of the settlement, community and local economy.
- iv. The draft Shropshire Local Plan proposes a significant allocation of land for employment development to 2038 and to safeguard land beyond 2038 as future option for mixed housing and employment growth. The continued enclosure of the town in the Green Belt without any future provision for growth may prevent Shifnal sustaining its community and its economic potential.
- v. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

**d. Improving Employment Opportunities in Shifnal:**

- i. Improving the employment land offer is an important component of changing the economy in Shifnal and sustaining its role in Shropshire's settlement hierarchy. This will sustain Shifnal as a key settlement in the strategic corridor which is accessible to the M54 and rail network despite being 'inset' into the Green Belt.
- ii. This objective is identified in the draft Shropshire Local Plan evidence where Shifnal is identified as a key investment location in the M54 Strategic Corridor where it is:
  - Located between Shrewsbury to the west and Wolverhampton to the east within the West Midlands conurbation offering opportunities as part of the Midlands Engine growth strategy;
  - Located close to the international investment site at i54 occupied by key growth sector industries for the West Midlands in advanced manufacturing;
  - Accessible to higher education and training institutions including key assets like RAF Cosford, Harper Adams University and University Centre Shrewsbury;
  - Expected to benefit from critical local infrastructure investment and strategic investment in the road and rail networks.
- iii. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

**e. Changing the Dormitory Character of Shifnal:**

- i. Shifnal has the opportunity to manage and improve the vitality of the community and the performance and productivity of the local economy. This can be achieved

through the settlement strategy for the town and the scale and delivery of development opportunities.

- ii. The settlement strategy for Shifnal should achieve three key objectives to achieve these benefits:
  - To manage the delivery of new housing and meet the needs of local communities for affordable homes and to enable people to live and work in Shifnal;
  - To create new employment opportunities to improve the performance of the local economy, reduce out-commuting and improve the vitality of the local community;
  - To increase demand for retailing, services and facilities within the town and to improve the service offer and capacity to meet the needs of the town and other communities in the Green Belt.
- iii. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

**f. Improving the Investment Programme for Shifnal:**

- i. Shifnal has been constrained by its location within the Green Belt. This constraint to development has also limited investment in the infrastructure of the town and in the range and quality of the retailing, services and facilities available to the resident population.
- ii. Shifnal requires a progressive and steady rate of growth to permit the infrastructure of the town to be improved in response to the requirements of new development. This will refresh and upgrade the infrastructure of the settlement to the benefit of the whole community.
- iv. The enclosure of the town in the Green Belt without further provision for future growth will prevent Shifnal from benefitting from these objectives. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

**g. Investment Potential and Business Needs**

- i. The need to refresh and improve the employment land offer is an important component of changing the capacity of Shifnal to fulfil the role of the town in the settlement hierarchy of Shropshire in particular to enable the town to function as a key settlement within the M54 strategic corridor.

- ii. This objective has been addressed in the evidence for the Local Plan in the M54 Strategic Corridor Study which concluded this location should be considered for investment due to:
  - the strategic corridor location between Wolverhampton to the east and Shrewsbury to the west closely related to the West Midlands conurbation and the associated opportunities of the Midlands Engine;
  - the adjacent international occupiers in target growth sectors for Shropshire i.e. advanced manufacturing / automotive / engineering;
  - the accessible infrastructure network and the benefits of pipeline infrastructure investment in road/rail over the coming years; and
  - the higher education and training institutions including key assets like RAF Cosford, Harper Adams University, University Centre Shrewsbury.
- iii. Employment in Shifnal is limited by the reliance of the town on 'service' industries. Employment opportunities therefore provide a limited choice for economically active people of working age who commute out of town to work in other areas.
- iv. A key limiting factor in the employment offer is the quality and quantity of land available to businesses wishing to settle or to expand in the town. The employment areas that exist have operated for many decades and these commercial premises no longer meet modern businesses requirements.
- v. The Local Plan review seeks to address these shortfalls through the release of Green Belt land to create a new employment area with high quality, modern business floorspace. This land release seeks to provide commercial development to meet the needs of strategic and local business demands.
- vi. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

#### **h. Green Belt Performance**

- i. In identifying the proposed employment allocation and safeguarded land, the performance against Green Belt purposes and the harm to the remaining Green Belt was given due consideration.
- ii. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.

***Exceptional Circumstances: Green Belt Releases to Accommodate Contributions to the Unmet Needs Forecast to Arise in the Black Country***

9.24. In summary, these exceptional circumstances include:

**a. Functional Relationship with the Black Country**

- i. The Employment Topic Paper (GC4n) examined the strategic relationships between Shropshire and the Black Country considering the geography of adjoining Functional Economic Market Areas (FEMA), the close proximity of strategic investment opportunities and the strategic road and rail network.
- ii. This assessment identified the following conclusions:
  - the proximity and connectivity to the Black Country Authorities would enable Shropshire to support the strategic planning objectives of these four authorities;
  - there are significant strategic employment developments and proposals on the M54/A5/A41 and A458/A454 through Shropshire and extending into the Black Country area;
  - these corridors link together the Shropshire Functional Economic Market Area (FEMA) with the Black Country / Southern Staffordshire FEMA, connecting to the M6 on the national motorway network within the Black Country area;
  - the proximity of the two FEMA and the focus of investment into the strategic corridors that link them together enhances the strategic relationships between Shropshire Council and the Black Country Authorities in the discharge of their duties as 'strategic policy making authorities'.
- iii. Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider exceptional circumstances identified.

**b. Meeting the Needs of the Black Country**

- i. In accordance with paragraph 26 of the NPPF, Shropshire and the Black Country Authorities recognise a 'mutuality' between the objectives of their Local Plans that will assist each of the strategic policy-making authorities in the "production of a positively prepared and justified strategy" for their respective Local Authority areas.
- ii. This 'mutuality' seeks to counter the challenges created by the more limited development capacity of the Black Country Authority areas. This is proposed to be achieved in Shropshire by further facilitating the Black Country Authorities to access

the strategic corridors, principal settlements and land resources in the adjacent subregional area.

- iii. Shropshire Council seeks to use the land resource capacity of the County to support the sustainable growth of the Shropshire economy. This will be achieved in part, by helping to meet both the investment demands in the business markets and the employment needs in the labour markets within the Black Country. This will help to deliver a larger, relatively younger and more reliable supply of labour to meet the needs of businesses operating within the Shropshire functional economic market area.
- iv. The authority seeks to ensure their strategy will build a strong and competitive economy in Shropshire and will also facilitate its neighbours to achieve the same objectives in their own administrative areas.
- v. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

**c. Strategic Matter for Shropshire**

- i. The Employment Topic Paper (GC4n) examined the strategic relationships between Shropshire and the Black Country. These functional relationships established that the unmet need in the Black Country is a relevant strategic matter for Shropshire Council.
- ii. The assessment of these relationships concluded that assisting the Black Country Authorities would meet the objectives of NPPF paragraphs 24 and 25 that: *'Local planning authorities...are under a duty to cooperate with each other..., on strategic matters that cross administrative boundaries'*, and to *'collaborate to identify relevant strategic matters which they need to address in their plans'*.
- iii. In seeking to assist the Black Country Authorities, Shropshire Council wished to ensure they retained the capacity to meet their own labour needs. This objective would meet the obligation in NPPF, paragraph 81 to *"allow each area to build on its strengths, counter any weaknesses and address the challenges of the future"*.
- iv. Shropshire will support the Black Country Authorities by seeking to influence commuting between Shropshire and the Black Country. This would be achieved in addition to accommodating the migration of some labour to new housing in Shropshire. The scale of the contributions to the Black Country Authorities at 1,500 dwellings and 30ha of employment land



would both redistribute some labour and also share an element of the Black Country labour pool.

- v. This approach sought to both meet the duty to cooperate by satisfying unmet needs in the region and also to ensure each participating authority would have the resources to deliver effective planning strategies for their administrative areas.
- vi. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

#### **d. Shropshire Economic Growth Strategy**

- i. Shropshire set out its economic growth vision in the Shropshire Economic Growth Strategy (2021 – 2025). Shifnal, located on the M54/A5 strategic corridor through Shropshire, has the potential to make a significant contribution to this strategy:
  - Shifnal can build on its strategic location and accessibility from its two junctions with the M54 motorway and its rail links into the metropolitan area. This indicates the investment potential of the town with the provision of new employment land to support existing businesses and to attract new investment into the town.
  - Shifnal can perform a key role in support of Bridgnorth as the principal centre in east Shropshire. The town can support supply chain companies for key growth sectors in the County and become an important source of labour by improving the self-containment of the town,
  - Shifnal might also provide support for further growth at key locations on the M54 corridor through the provision of strategic employment land to attract significant inward investment, linked to future housing provision.
- ii. A strategy to deliver more sustainable development with an improving level of self-containment, would help Shifnal to support strategic investment locations including i54 and the proposed West Midlands Interchange and to support key urban centres at Shrewsbury, Telford, Wolverhampton, Dudley and Walsall.
- iii. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

#### **e. Premium Value for Investors**

- i. The designation of employment allocation SHF018b & SHF018d in Shifnal as the preferred location to satisfy the unmet need in the Black Country places a premium value on this investment location.

- ii. This premium value arises from its location on the M54, the proximity to the Black Country, the size and capability of the investment site to accommodate both strategic and local business investment and the recognition of the allocation as the preferred location to support the unmet needs in the Black Country.
- iii. The sensibility of the location, the scale of the land provision, the character and setting of the site and the strategic function of the proposed development constitute a sound and marketable investment prospect in a regional, commercial property market, that is experiencing a growing demand for new, higher quality, business locations.
- iv. It is considered this represents an exceptional circumstance to justify the release of land from the Green Belt.

***Site Boundaries and Compensatory Improvements to the Green Belt***

- 9.25. In identifying the two proposed areas of safeguarded land to be removed from the Green Belt and the remaining safeguarded land, due consideration was given to resultant Green Belt boundaries and the ability to provide for compensatory improvements to the Green Belt. This is consistent with the requirements of paragraphs 142 and 143 of the NPPF.
- 9.26. These matters are addressed within paragraphs 8.150-8.161 of the Green Belt Revised Exceptional Circumstances Statement (EV051).