

9 June 2024
Bradford Rural Estates reps cover letter 11 June 2024.docx



Shropshire Council
Planning Policy

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Dear Sir / Madam

Shropshire Local Plan Examination

Further consultation on additional material prepared in response to the Planning Inspectors' Interim Findings.

Representations submitted on behalf of Bradford Rural Estates Ltd (BRE)

Representor Part A Reference: A0137

Further to the consultation on additional evidence to the Shropshire Local Plan review, we are instructed by Bradford Rural Estates Limited to submit representations in relation to GC44 Additional Sustainability Appraisal, GC45 Updated Housing and Employment Topic Paper, and GC46 Updated Green Belt Topic Paper.

These representations are objections to the documents and relate to both legal compliance and soundness.

As the consultation is about evidence rather than the policies of the Local Plan review, the matters addressed in these representations relate to approach and subject rather than being confined to a single paragraph or section as they may be for a policy document. Accordingly, the representations appended to this letter, are set out under the heading of each document separately, and, where possible, are sub-divided into specific subject matter.

These representations build upon concerns set out in the Aardvark Planning Law letter to the Treasury Solicitor dated 24 April 2024. A copy of that letter is attached for reference.

Form A and a single copy of Form B are enclosed for completeness. Form B is not however supplied for every representation, instead the information required by Form B is set out at the start of each separate representation.

For the avoidance of doubt, Bradford Rural Estates Ltd wishes to appear at the further sessions of the Examination in respect of all matters raised by the additional evidence in respect of GC44, GC45 and GC46 and the representations made thereon.

If the Council wishes to discuss any of the matters raised by these representations ahead of the Examination re-opening, we would be pleased to do so.

We are unable to locate some of the documents to which we refer in the evidence list or Council document list for the Examination, and therefore include them with our representations for reference.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Yours faithfully

Paul Rouse
Director

Encs

Form A

Form B

Representations of Bradford Rural Estates Limited to: GC44, GC45, GC46.

Shropshire Council Consultation on Strategic Sites July 2019

Tyler Parkes Green Belt Assessment of J3

Cabinet report 20 July 2020

Cabinet report 7 December 2020

Aardvark letter 24 April 2024

Part B: Your Response

Please complete a separate Part B form for each response that you wish to make. One Part A form must be enclosed with your Part B form(s).

To assist in making a response, separate Guidance **is available on the Council's website**. Responses should be returned by 5:00pm on Tuesday 11th June 2024.

Name and Organisation:	Paul Rouse, Savills on behalf of Bradford Rural Estates Limited
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input checked="" type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	Please refer to attached letter for each respective document and where appropriate paragraph reference. Where possible, the letter is split into sections dealing with each document and subject separately
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s). Please be as precise as possible.

Please refer to attached letter and enclosures setting out all representations with the information required by this form for each .

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.



Bradford Rural Estates Limited

Part A reference: A0137

Representations to consultation on additional evidence:

GC44 Additional Sustainability Appraisal

GC45 Updated Housing and Employment Topic Paper

GC46 Updated Green Belt Topic Paper



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1. GC 45 Updated Housing and Employment Topic Paper

1.1. Objection – Not Sound

1.1.1. The time horizon of the Plan and its housing and employment need calculations is not consistent with national policy.

1.2. Changes Sought

1.2.1. Extend the plan period to 2040.

1.2.2. The housing requirement based upon the Council's approach (to which we submit objections) should be increased by two additional years' requirement. Based upon the Council's proposals in GC45, that is an additional 2,710 homes.

1.2.3. The employment land requirement based upon the Council's approach (to which we submit objections) should be increased by two additional years' requirement. Based upon the Council's proposals in GC45 that is an additional 26ha.

1.2.4. We propose that both the requirements to 2038 and the net increases as a result of the required additional 2 year plan period, should both be greater for housing and employment than the above figures. Reasons are explained in objection to the reassessment of the housing and employment requirements for Shropshire's needs in GC45.

1.3. Explanation

1.3.1. The plan period is currently 2016 – 2038 covering a 22 year period. The end date is 14 years from today. NPPF para 22 sets a minimum horizon for a plan of 15 years from date of adoption. The Plan is not expected to be adopted until some point in 2025 at which point the current plan horizon will be 13 years. The plan period is currently too short and the housing and employment figures in GC45 should take account of a longer time scale covering a minimum of 15 years from adoption.

1.3.2. The Inspectors have stated in ID39 that the Plan will not be adopted until 2025. It follows therefore that the plan period must be extended to at least 2040. Given the housing land supply monitoring year runs from April to March, unless there is certainty that the Plan will be adopted before April 2025, it appears that the plan period should be extended until 2040, with a two year additional period for which housing and employment requirements must be taken into account.

1.3.3. In calculating the additional requirement based upon annual requirement, we have first deducted the 1,500 contribution to the Black Country as that is a fixed amount, such that the annualised requirement

reflects the Shropshire requirement only (OAN + Shropshire growth) which GC45 defines as 29,800¹ over 22 years = 1,355pa. The two year additional requirement is therefore 2,710.

- 1.3.4. By similar process the additional employment land requirement is calculated from the requirement identified by GC45², by first deducting the 30ha for the Black Country, the employment land calculation is: 290ha over 22 years = 13.2ha pa. The two year additional requirement is therefore 26.4ha.

¹ GC45 Updated Housing and Employment Topic Paper April 2024: paras 7.55 – 7.57

² Ibid : para 14.58

2. GC 45 Updated Housing and Employment Topic Paper

2.1. Objection – Not legally compliant and not sound

2.1.1. The reassessment of housing and employment requirements for Shropshire needs is not legally compliant and not positively prepared, or justified or effective or consistent with national policy.

2.2. Changes Sought

2.2.1. The housing requirement for Shropshire (OAN + Shropshire growth) should remain as the submitted Plan at 30,800. The agreed provision for the Black Country should be added to the Shropshire requirement to generate the overall Plan requirement (OAN + Shropshire growth + provision for Black Country), which should be 32,300 for the current proposed plan period of 2016 - 2038.

2.2.2. The employment requirement for Shropshire (OAN + Shropshire growth) should remain as the submitted Plan at 300ha. The agreed provision for the Black Country should be added to the Shropshire requirement to generate the overall Plan requirement (OAN + Shropshire growth + provision for Black Country), which should be 330ha for the current proposed plan period of 2016 - 2038.

2.2.3. The overall housing and employment requirements should reflect the above change and also the additional two years of plan period that is required (see the related objection to the Plan period). The additional two year plan requirement figures should be calculated from the annual requirement as corrected above. This results in a slightly increased annual requirement for both housing and employment compared to the figures set out in the related objection to Plan period. The agreed provision for the Black Country should then be added to the corrected additional two year plan period requirement for Shropshire (OAN + Shropshire growth). The resultant figures over the extended plan period of 2016 – 2040 are an overall requirement (OAN + Shropshire growth + provision for the Black Country) of:

- At least 35,100 dwellings
- At least 357ha employment land

2.3. Explanation

2.3.1. BRE maintains its position set out in OD004 that there is no basis for the Council to recast the objectively assessed requirement (OAN + additional growth factor for Shropshire) for either housing or employment. The Inspectors have not found the Plan unsound in those respects and have made no request for modifications to those aspects in order to make the Plan sound. By way of illustration, the Inspectors have stated the following:

2.3.2. ID28 §10 – The requirement figures in SP2 are around 30,800 homes and around 300ha employment

- 2.3.3. ID28 §11 – The conflation to which the Inspectors refer is the attempt to include the 1,500 homes and 30ha within the Shropshire requirement (OAN + Shropshire growth). (Our understanding is that the Shropshire requirement + Black Country provision = the overall requirement.)
- 2.3.4. ID28 §13 – The Council’s approach to identifying the housing and employment land needs derived within Shropshire itself is sound. [We understand that need in this context refers to OAN + Shropshire growth.]
- 2.3.5. ID28 §17 –It was not until a point between the Regulation 18 and Regulation 19 stages of the Plan [July 2020 and December 2020] that the Council agreed to accommodate 1,500 dwellings and 30ha to support the ABCA area, which was after the evidence base had been completed including the SA.
- 2.3.6. ID28 §19 – The SA is based on meeting only the needs of Shropshire. [The SA to which the Inspectors refer includes OAN + Shropshire growth which supports our understanding of §13.]
- 2.3.7. ID28 §22 – If following the additional SA work the Council chooses to pursue the same growth options as before, then it follows that the housing and employment land requirements will increase. [The additional SA work required is as a result of the Plan proposing to meet Black Country needs in addition to Shropshire needs see §20. The Inspectors are therefore asking that the SA test the Black Country provision added to the current proposal of Shropshire OAN + Shropshire growth.]
- 2.3.8. ID28 §24 – The additional work we have identified is necessary for us to find the Plan sound.
- 2.3.9. ID28 §37 – The housing and employment land requirement figures should be expressed as definitive minimum figures for both monitoring and effectiveness.
- 2.3.10. ID28 §54 – For the reasons set out above, the development strategy set out in the Plan is unsound and further work and modifications will be required to progress the examination.
- 2.3.11. ID36 §2 – In ID28 we found that the Council’s approach to identifying the housing and employment land needs within Shropshire itself to be sound. [As set out above we understand the Inspectors to mean OAN + Shropshire growth within ‘needs within Shropshire’.] In our letter we did not say that the housing requirement figure for Shropshire was sound. [We understand that to mean that the overall requirement taking account of OAN + Shropshire growth + provision for Black Country was not sound.]
- 2.3.12. ID36 §5 – We did not indicate in our letter in February [ID28] that it would be appropriate to take account of the most up to date local housing need figure in carrying out the additional work.
- 2.3.13. ID36 §6 – Even where housing need figures based on LHN become more than 2 years old during an examination, there would have to be particular circumstances to require a review. We are not currently aware that these circumstances exist here.
- 2.3.14. ID36 §9 – Our initial findings letter [ID28] did not ask the Council to review its own housing requirement figure. [We understand that to be OAN + Shropshire growth as set out above.] Instead the Council was asked to assess through further SA work the implications of meeting the agreed provision for the Black Country in addition to the needs of Shropshire [the Shropshire requirement].

- 2.3.15. ID36 §10 – Whilst our letter refers to potentially assessing different growth options as part of the SA work, it does not invite the Council to review the baseline growth options for Shropshire itself.
- 2.3.16. ID36 §13 – There seems to be very limited evidence to justify the reduction on the housing and employment land requirement for Shropshire itself, which we did not ask the Council to review in our February letter (ID28).
- 2.3.17. It is clear from the above, that the Inspectors have not found the calculation of housing and employment figures for Shropshire’s OAN + Shropshire’s growth to be unsound. There has been no request that either the Shropshire OAN or the Shropshire growth factor should be reassessed for either housing or employment in order to address an issue of soundness.
- 2.3.18. In response to the Council having carried out re-assessment of matters it was not asked to re-assess after the Inspectors’ response in ID28, the Inspectors have set out clearly in ID36 the Council’s error and underlined that they did not ask for such action. The Inspectors have re-stated clearly the defined task they have asked of the Council in order to address soundness. That was in essence to update the SA to add the agreed provision for the Black Country to the Shropshire requirement (OAN + Shropshire growth) which is all that had been tested in the SA thus far.
- 2.3.19. Even if there is some reason why reassessment of the housing or employment figures may be better taking account of more up to date circumstances, that does not affect the matter of legal compliance; namely, that, in the absence of the Inspectors requesting the Council to re-assess the needs for Shropshire and the growth for Shropshire, there is no ability for the Council to propose such changes to the Plan once it has been submitted.
- 2.3.20. Under the terms of the Planning and Compulsory Purchase Act 2004 s20(7C) an Inspector is able to recommend modifications necessary to make a plan sound. It follows that the Council is able to make modifications in response to those recommendations.
- 2.3.21. The Planning Inspectorate’s Examination Procedure Guide introduction states that in circumstances where a plan is unsound but is capable of being made sound, the Inspector must recommend the necessary main modifications. The main modifications must relate directly to the reasons why the Inspector has found the Plan unsound or not legally compliant. The Procedure Guide states that there is no provision in the legislation which allows the LPA to replace all or part of the submitted plan with a revised plan during the examination³.
- 2.3.22. GC45 reduces the housing requirement for Shropshire (OAN + Shropshire growth) from 30,800 in the submitted plan to 29,800. The process is the same as that in the superseded GC29 which is explained in GC41 3.4 – 3.14. A reduction of 1,000 dwellings in the requirement for Shropshire (OAN + Shropshire growth) results from the use of the 2020 base date for calculation of OAN as opposed to the 2016 base date in the submitted Plan.
- 2.3.23. GC45 reduces the employment requirement for Shropshire (OAN + Shropshire growth) from 300ha in the submitted plan to 290ha. A reduction of 10ha.
- 2.3.24. There is no valid justification or legal mechanism to support either of those changes.

- 2.3.25. In GC41, the Council relies upon its interpretation of ID36 para 2 as the basis for it to recast the housing and employment needs for Shropshire. The Council considers that ID36 para 2 which itself cross references to ID28 confirms that the Inspectors had not found the housing and employment requirements for Shropshire sound. To our reading, this continues the confusion of conflation of need and requirement.
- 2.3.26. In ID36, para 2 the Inspectors are referring to the fact that they had not found the overall housing or employment requirements for Shropshire sound. That is because the overall requirements for Shropshire must take account of objectively assessed need + growth specific to Shropshire's objectives + agreed provision for the Black Country. The figures of 30,800 homes and 300ha of employment to which reference is made in ID36 para 2, were the figures that the Council proposed in policy SP2 as being the overall requirement. For reasons that are set out in ID28, the Inspectors required the provision for the Black Country to be added to the figures of 30,800 and 300ha which were calculated from assessment of Shropshire objectively assessed need and growth for Shropshire needs only (see paras 11, 13, 17, 19 and 22). The Inspectors did not say in ID28 that they found either the OAN for housing or employment or the assessment of additional growth for Shropshire needs to be unsound. Conversely, ID28 para 13 confirms that the Inspectors consider the Council's approach to identifying the housing and employment land needs within Shropshire is itself sound.
- 2.3.27. It was the Council's attempted inclusion of the Black Country provision with those Shropshire requirements that the Inspectors found unsound (para 11). ID28 para 24 states clearly that it is the additional work identified (in ID28) that the Inspectors require before the Plan can be found sound. Nowhere in ID28 is there any requirement to revisit either the objectively assessed need for Shropshire or the growth factor for Shropshire for either housing or employment. The Inspectors restated the above unequivocally in ID36 paras 5, 6, 9 and 10.
- 2.3.28. The requirements which should be set out at policy SP2 should be calculated as follows (in accordance with our related objection to the plan period):
- 2.3.29. First, deduct the contributions to the Black Country returning to the figures in the submitted plan. Then divide by current plan period, add two additional years of that annual rate, plus the Black Country provision.
- 2.3.30. $-30,800$ (OAN + Shropshire growth) \div 22 years = 1,400pa. The two year additional requirement is therefore 2,800. Plus the Black Country provision of 1,500 = 35,100
- 2.3.31. -300 ha (OAN + Shropshire growth) \div 22 years = 13.6ha pa. The two year additional requirement is therefore 27.2ha. Plus the Black Country provision of 30ha = 357ha.

3. GC 45 Updated Housing and Employment Topic Paper

3.1. Objection – Not sound

3.1.1. The approach to providing for the net increase in housing and employment land requirements is not positively prepared, not justified and not consistent with national policy.

3.2. Change Sought

3.2.1. The net increase in dwellings should not be accommodated through increased windfall allowance above the submitted Plan levels.

3.2.2. For reasons set out in our objections to the Plan period and the re-assessment of housing requirements, the net increase in housing should not be regarded as 500 dwellings as the Council suggest. The net increase required to be accommodated in the Plan over the period to 2040 is 4,300 dwellings.

3.2.3. All net additional dwellings should be provided through the allocation of additional identified site(s).

3.2.4. 1,500 of those net additional dwellings are specifically for the purpose of contributing towards the needs of the Black Country. Accordingly, that provision should be made through specific site allocation(s) which are qualitatively and locationally suited to meeting the needs of the Black Country. The location of that provision does not need to accord with the development strategy in the submitted plan which has been found unsound in respect of responding to the needs of the Black Country. The allocation of sites for the Black Country provision should take account of the specific locational, qualitative and other factors underpinning the Black Country need.

3.2.5. The additional 2,800 dwellings attributable to the additional 2 year plan period are for Shropshire's needs. Those dwellings should be located in accordance with the Submitted Plan distribution strategy for Shropshire. There could be benefits for sustainability and for meeting the needs of both Shropshire and the Black Country if some or all of the additional housing provision for Shropshire is co-located with the housing and employment provision for Black Country needs.

3.3. Explanation

3.3.1. The Council propose that the net additional housing requirement resulting from the addition of the Black Country provision to the Shropshire requirement (OAN + Shropshire growth) is just 500 dwellings. That can only result from a corresponding reduction in the Shropshire requirement which, as we have set out in other objections, is neither legally compliant nor sound (see our objection to the re-assessment of Shropshire's requirement and review of ID28 and ID36 and what they did and did not ask the Council to do).

3.3.2. Notwithstanding that disagreement about the quantum of additional need resulting from account being taken of the Black Country provision, any such increase in the housing requirement must respond to the specific needs of the Black Country. However, that additional windfall allowance is the only additional housing provision proposed in response to Black Country need.

- 3.3.3. None of the allocations for Shropshire's requirements (OAN + Shropshire growth) have been found unsound by the Inspectors. For reasons explained in related objections to the de-allocation and re-allocation of part of sites BRD030 Tasley Garden Village, SHR060, SHR158, SHR161 Land between Mytton Oak Road and Hanwood Road, Shrewsbury and IRN001 Former Ironbridge Power Station, those sites are not able nor suited to provide for Black Country needs. All of the housing supply identified in the submitted Plan was proposed to meet the Shropshire requirement which the Inspectors have found sound. Simple logic therefore must conclude that the net addition of 500 dwellings proposed is the total extent of the provision which the Council is proposing for Black Country needs. That is 1,000 dwellings short.
- 3.3.4. Moreover, those 500 dwellings for the Black Country provision are not proposed to be provided through the identification of specific sites as the Inspectors have requested. Instead, the Council has proposed de-allocation of part of three housing sites included within the Plan for Shropshire's needs. This notional allocation of land for Black Country needs is presented in GC44 and GC45. Please refer to our related objections to the site allocations in GC 45 and to GC44 generally.
- 3.3.5. The GC45 proposed increased windfall allowance is for Shrewsbury, Whitchurch and Ironbridge Power Station. Whitchurch is in the north of the county and has no relationship with the Black Country. It is approximately 40 miles and 1 hour's drive from Wolverhampton. The quickest route is via the A41 to M54 J3 (approximately 30 miles) then via the M54 and M6. Ironbridge power station is on the west side of Ironbridge. The quickest travel time between the former power station site and Wolverhampton is around 40 minutes via the M54 J6 and M6, a journey of around 25 miles. The quickest travel time between Shrewsbury and Wolverhampton is around 50 minutes, a distance of approximately 33 miles via the A5, M54 (whole length) and M6. (All journey times are weekend / off-peak). Increased windfall provision in these locations even if it was to materialise, would not meet the needs of the Black Country.
- 3.3.6. The quickest access route from all of these proposed windfall locations to the Black Country (for which we have used Wolverhampton city centre as a proxy) is via the M54. The route to all three locations passes M54 J3. By comparison the distance from the BRE J3 site to Wolverhampton is approximately 12 miles with a journey time of around 21 minutes. Quite apart from the expectation of additional windfall provision being unfounded as explained below, the proposal that the provision for the Black Country should be made by housing in three locations between 2 to 3 times the journey time and up to 5 times the distance from the Black Country as the BRE J3 site which is supported by the Black Country Authorities, is unjustified and inconsistent with national policy.
- 3.3.7. NPPF §72 states where an allowance is to be made for windfall sites as part of anticipated supply, there should be **compelling** evidence that they will provide a **reliable** source of supply (our emphasis).
- 3.3.8. The Council points to greater provision from windfall than had been anticipated in the plan period to date, but that could simply mean that the finite supply from windfall sources has come forward more quickly than anticipated. It does not indicate an increase in windfall capacity. On the contrary, the capacity of windfall sites and all sites for housing and employment can be expected to significantly reduce due to the need to accommodate biodiversity net gain (BNG).

- 3.3.9. The amount of land required for BNG and the proportion by which each and every allocation site and every windfall site will reduce in capacity will require site specific assessment, but it is conceivable that the developable area of all development sites could reduce by a significant proportion, possibly up to 50% if the statutory preference of on-site provision is to be achieved.
- 3.3.10. The Plan provides no policy dealing with BNG; this reflects the fact that the Plan was submitted 3 September 2021 and the Levelling-up and Regeneration Act 2023 did not gain Royal Assent until 26 October 2023. The Act provisions relating to the implementation of the BNG requirement came into effect 12 February 2024 for large sites and 2 April 2024 for small sites. As a result of these provisions, there is no certainty around how much allocated sites or windfall sites will deliver. A cautious approach should be exercised in assessing the expected supply from sites. There is no compelling evidence that additional allowance of unidentified windfall sites will provide a reliable source of supply.
- 3.3.11. The M54 Strategic Development Corridor Vision and Strategy produced by Shropshire Council (September 2019) identifies the benefits of providing for the identified needs through development of a strategic site in the M54 corridor.

4. GC 45 Updated Housing and Employment Topic Paper

4.1. Objection – Not sound

- 4.1.1. The approach for providing for the net increase in employment land requirement is not positively prepared and not justified.

4.2. Change Sought

- 4.2.1. The net increase in employment land requirement should not be accommodated through increased windfall allowance above the submitted Plan levels.
- 4.2.2. For reasons set out in our objections to the Plan period and the re-assessment of employment land requirements, the net increase in employment land should not be regarded as 20ha as the Council suggest. The net increase required to be accommodated in the Plan over the period to 2040 is 57ha.
- 4.2.3. All net additional employment land should be provided through the allocation of additional identified site(s).
- 4.2.4. 30has of the net additional employment land are specifically for the purpose of contributing towards the needs of the Black Country. Accordingly, that provision should be made through specific site allocation(s) which are qualitatively and locationally suited to meeting the needs of the Black Country. The location of that provision does not need to accord with the development strategy in the submitted plan which has been found unsound in respect of responding to the needs of the Black Country. The allocation of sites for the Black Country provision should take account of the specific locational, size, qualitative and other factors underpinning the Black Country need.
- 4.2.5. The additional 27ha attributable to the additional 2 years plan period, are for Shropshire's needs. That employment land should be located in accordance with the Submitted Plan distribution strategy for Shropshire. There could be benefits for sustainability and for meeting the needs of both Shropshire and the Black Country if some or all of the additional employment land provision for Shropshire is co-located with the employment and housing provision for Black Country needs.

4.3. Explanation

- 4.3.1. The Council propose that the net additional employment land requirement resulting from the addition of the Black Country provision to the Shropshire requirement (OAN + Shropshire growth) is just 20ha. That can only result from a corresponding reduction in the Shropshire requirement which as we have set out in other objections is neither legally compliant nor sound (see our objection to the re-assessment of Shropshire's requirement and review of ID28 and ID36 and what they did and did not ask the Council to do).

- 4.3.2. Notwithstanding that disagreement about the quantum of additional need resulting from the Black Country provision, that any such increase in the employment land requirement must respond to the specific needs of the Black Country. However, that additional windfall allowance is the only additional employment land provision proposed in response to Black Country need.
- 4.3.3. None of the allocations for Shropshire's requirements (OAN + Shropshire growth) have been found unsound by the Inspectors. For reasons explained in BRE's other objections to the de-allocation and re-allocation of part of sites SHF018b and SHF018d, those sites are not able nor suited to provide for Black Country needs.
- 4.3.4. All of the employment land supply identified in the submitted Plan was proposed to meet the Shropshire requirement which the Inspectors have found sound; simple logic indicates that the net addition of 20ha is the total extent of the provision which the Council is proposing for Black Country needs. That is 10ha short.
- 4.3.5. Moreover, those 20ha for the Black Country provision are not proposed to be provided through the identification of specific sites as the Inspectors have requested. Instead, the Council has proposed de-allocation of two employment sites included within the Plan for Shropshire's needs. This notional allocation of land for Black Country needs is presented in GC45 and GC44. Please refer to our related objections to the site allocations in GC 45 and to GC44 generally.
- 4.3.6. The Council states that the source of the additional windfall employment sites is assessed to be existing employment sites which come around for redevelopment and redevelopment of rural premises and unspecified previously developed land (15.24).
- 4.3.7. The supply of 'other' previously developed land is far from certain, particularly in view of the Council's proposed increased reliance on windfall housing which is likely to make first claim on available previously developed land.
- 4.3.8. The redevelopment of existing employment sites is not net additional employment land and is in effect double counting.
- 4.3.9. The redevelopment of agricultural sites for employment is less likely following recent relaxation of agricultural to residential permitted development rights. Rural sites are also likely to be small scale, in less than strategic locations and be relatively low quality in terms of attraction to employers.
- 4.3.10. This double counting and poor quality piecemeal and uncertain provision is the Council's total response to meeting the additional employment land requirement arising from the Black Country provision. Because the Shifnal allocations SHF018b and SHF018d should, we say, be considered as meeting Shropshire requirements in accordance with the Submission Plan, it is this poor quality, uncertain, piecemeal proposal which is, in effect, proposed to meet the Black Country needs.
- 4.3.11.** Please refer to the similar objection to the use of windfall allowance for the net housing increase for reasons related to biodiversity net gain which, together with the above, strongly suggest that there is no compelling evidence that additional allowance of unidentified windfall sites will provide a reliable source of supply.

5. GC 45 Updated Housing and Employment Topic Paper

5.1. Objection – Not legally compliant and not sound

- 5.1.1. The approach of de-allocating part of sites submitted for Shropshire’s housing requirement and reallocating part for Black Country requirements is not legally compliant, not positively prepared, or justified or effective or consistent with national policy.

5.2. Change Sought

- 5.2.1. New site(s) with capacity for 1,500 dwellings should be identified to meet the increased overall housing requirements resulting from the addition of the 1,500 homes provision for the Black Country. Those site(s) should be qualitatively and locationally suited to meeting the needs of the Black Country.

5.3. Explanation

- 5.3.1. The Black Country provision is proposed to be accounted for by re-assigning parts of sites proposed for allocation for Shropshire’s needs in the submitted Plan. Parts of sites BRD030 Tasley Garden Village (600 dwellings), SHR060, SHR158, SHR161 Land between Mytton Oak Road and Hanwood Road, Shrewsbury (300 dwellings) and IRN001 Former Ironbridge Power Station (600 dwellings) are in effect proposed to be de-allocated as providing for Shropshire needs and re-allocated as providing for Black Country needs⁴. There is no basis for the de-allocation of parts of these sites and the sites are not sound proposals for meeting the Black Country housing needs.
- 5.3.2. The inclusion of all of the above sites in the Submission Plan was for the purpose of contributing to meeting the Shropshire housing requirement. The purpose and justification for the allocation of the sites cannot change after the Plan has been submitted unless the Inspectors find that the original purpose for which the sites have been proposed for allocation (for Shropshire’s needs) is unsound and the Council is specifically asked to not allocate those sites for that purpose in order to make the Plan sound.
- 5.3.3. Please see related objection to the reassessment of housing and employment needs. There is no legal basis or soundness reason for the proposed allocations for Shropshire’s purposes to be changed post submission of the plan. The Inspectors have not found the proposed allocation of the above sites for Shropshire purposes to be unsound, and have requested no change in respect of those proposed allocations for Shropshire’s purposes to make the plan sound.
- 5.3.4. See also related objections to GC44 Updated Sustainability Appraisal.

⁴ GC45 Housing and Employment Topic Paper: paras 9.10 & 9.12 – 9.14, Table 9.1

6. GC 45 Updated Housing and Employment Topic Paper

6.1. Objection – Not legally Compliant and not sound

6.1.1. The approach of de-allocating part of sites submitted for Shropshire’s employment requirement and reallocating part for Black Country requirements is not legally compliant, not positively prepared, or justified or effective or consistent with national policy.

6.2. Change Sought

6.2.1. New site(s) with capacity for 30ha of employment development should be identified to meet the increased overall employment land requirements resulting from the addition of the 30ha provision for the Black Country. Those site(s) should be qualitatively and locationally suited to meeting the needs of the Black Country.

6.2.2. The identification of site(s) to meet the Black Country need should take account of the specific needs of the Black Country in qualitative and locational terms, and the relevant objectives of the Plan, together with the evidence base. See related objection to GC44 Additional Sustainability Appraisal.

6.3. Explanation

6.3.1. The Black Country provision is proposed to be accounted for by re-assigning parts of sites proposed for allocation for Shropshire’s needs in the submitted Plan. Part of sites SHF018b and SHF018d Land east of Shifnal Industrial Estate, Shifnal (30ha of a total 39ha to achieve a total of 16ha of floorspace) are in effect proposed to be de-allocated as providing for Shropshire needs and re-allocated as providing for Black Country needs⁵. There is no basis for the de-allocation and the sites are not sound proposals for meeting the Black Country employment needs.

6.3.2. Please see related objection to the reassessment of housing and employment needs. There is no legal basis or soundness reason for the proposed allocations for Shropshire’s purposes to be changed post submission of the plan. The Inspectors have not found the proposed allocation of the above sites *for Shropshire purposes* to be unsound, and have requested no change in respect of those proposed allocations for Shropshire’s purposes to make the plan sound.

6.3.3. ID36 para 15 explains that sites which are included in the Submitted Plan and assessed through the SA supporting that Plan (as submitted) are supported by evidence relating to meeting the needs of Shropshire only. That justification for the allocation of SHF018b and SHF018d cannot be ignored because the Council now considers the same sites could be used for a different purpose. The submitted Plan and submitted evidence base proposing the allocation of those sites for Shropshire’s requirement has not been found unsound and the Inspectors have not asked for it to be changed.

6.3.4. See also related objections to GC44 Updated Sustainability Appraisal.

⁵ GC45 Updated Housing and Employment Topic Paper: Table 16.1, paras 16.10-11 & 16.192

7. GC 45 Updated Housing and Employment Topic Paper

7.1. Objection – Not sound

- 7.1.1. The proposed allocations for Black Country needs are not consistent with the requirements of Authorities Monitoring Reports as set by the Town and Country Planning (Local Planning (England) Regulations 2012 regulation 34 (3), and not therefore consistent with national policy.

7.2. Change Sought

- 7.2.1. The site(s) proposed to meet the 1,500 homes and 30ha employment for the Black Country needs should be specific to and identified solely for the purpose of meeting Black Country needs in order to enable clear and unambiguous monitoring of the delivery of that strategic policy objective.

7.3. Explanation

- 7.3.1. The sites proposed to meet the Black Country housing and employment provision are all split between part contributing towards meeting Shropshire's requirement and part contributing to meeting the Black Country's requirement. As a result. It is not possible to measure the extent to which the delivery of homes and employment provision on those sites should be counted towards the Black Country need until (a) the total delivery from each site is complete and (b) the planned contribution to Shropshire's requirement from each site is deducted. Consequently, the proposed site allocations do not allow accurate or appropriate monitoring of delivery for the Black Country; the part allocation of sites to meet the Black Country needs does not satisfy the Inspectors' requirement for monitoring contained in ID28, para 26.
- 7.3.2. BRD030 is stated to have total capacity of 1,050 dwellings, of which 450 are now proposed for Shropshire's requirement and 600 proposed for the Black Country.
- 7.3.3. SHR060, SHR158 and SHR161 are stated to have total capacity of 1,500 dwellings, of which 1,200 are now proposed for Shropshire's requirement and 300 proposed for the Black Country.
- 7.3.4. IRN001 is stated to have capacity of 1,075 dwellings (including an assumed 75 unit care home based upon a viability report – 8.73 & 8.90) of which 475 are now proposed for Shropshire's requirement and 600 proposed for the Black Country.
- 7.3.5. SHF18b and SHF18d combined are stated to have capacity of 39ha gross of which 9ha is now proposed for Shropshire's requirement and 30ha proposed for the Black Country.
- 7.3.6. Delivery at the end of each site's development will push delivery for the Black Country needs to later in the plan period. This is inappropriate and does not assist the Black Country with adequately meeting its *current* needs.

8. GC44 Updated Additional Sustainability Appraisal

8.1. Objection

- 8.1.1. The SA is not positively prepared, justified, effective or consistent with national policy. The SA assessment does not take account of the objectives of the Plan in considering the Black Country need as it is required to do so by the Environmental Assessment of Plans and Programmes Regulations 2004. Consequently, it is not legally compliant.

8.2. Changes Sought

- 8.2.1. The assessment should take account of appropriate plan objectives as outlined below.
- 8.2.2. The assessment should take account of the specific features of the Black Country needs, and not be based upon factors relevant to Shropshire only.
- 8.2.3. The reasonable alternatives should include the only site which ABCA has stated in representations to be a suitable location to meet the Black Country's housing and employment provision from Shropshire.
- 8.2.4. The reasonable alternatives should consider accurately the site at J3 which ABCA has explicitly supported, and that site should be assessed utilising an appropriate boundary of the site as proposed for development.
- 8.2.5. The assessment should take account of the Council's evidence base where relevant, including the M54 Growth Corridor Strategic Options Study and Consultation on Strategic Sites.
- 8.2.6. The assessment should recognize the limitations of evidence prepared with Shropshire objectives only in mind and objectively consider how previous assessments need to be viewed differently with the objective of providing for Black Country needs.

8.3. Explanation

- 8.3.1. The Updated SA is unsound because it does not take account of appropriate plan objectives in its updated analysis, and it does not consider reasonable alternatives to the Council's preferred option. In particular, the assessment of alternatives does not accurately include the BRE promoted site at M54 J3. P26 Amended and P26 Amended v2 are treated as proxies for the BRE site but they are quite different in geographic extent and the features they contain.
- 8.3.2. The Updated SA appears not to have been undertaken as an objective exercise to inform the Plan proposals as part of an iterative process but, instead, appears to have been prepared in order to support commitments made by the Council at Cabinet meetings in July and December 2020 that making provision for the 1,500 homes and 30ha of employment land for Black Country needs would require no additional sites.

- 8.3.3. The SA process must consider **reasonable** alternatives, and must assess plan proposals against **relevant** environmental, economic and social objectives. It is intended to be an assessment of the potential for plan proposals to contribute to improvements in environmental, social and economic conditions, as well as identifying any negative effects the plan may have. It is only by assessing the potential for proposals to contribute positively and their negative effects that it can be determined which reasonable alternatives is appropriate. Sustainability appraisal is intended to be an iterative process informing the plan (see PPG Paragraph: 001 Reference ID: 11-001-20190722 for all these points).
- 8.3.4. The Inspectors have provided guidance to the Council about the requirements for the Additional SA in considering the proposed site(s) to meet the provision for the Black Country. Relevant guidance includes:
- 8.3.5. ID28 §19 the objectives and geographical scope of the Plan changed when the Council agreed to accommodate some of the unmet needs of the Black Country. The housing and economic growth options and the distribution tested in the SA as submitted were all based on just meeting the needs of Shropshire.
- 8.3.6. It follows therefore, that the revised SA should have regard to different objectives, and measures of assessment when considering the Black Country provision in contrast to the Shropshire provision.
- 8.3.7. ID28 §22 – consideration will need to be given to the distribution of development since accommodating some of the [Black Country] need may result in more sites being required in the part of Shropshire nearest the Black Country.
- 8.3.8. ID28 §23 – it seems unlikely that the unmet needs of the Black Country could be met without the release of Green Belt land.
- 8.3.9. ID36 §15 – Clearly sites to meet the agreed unmet needs of the Black Country are likely to be most appropriately located close to the Council’s administrative boundary with the Black Country authorities. Whilst the Council identify specific sites to meet both the housing and employment needs of the Black Country, the sites which have been selected are sites that underwent SA assessment to meet the needs of Shropshire as a whole and not the specific needs of the Black Country.
- 8.3.10. BRE consider the underlying basis for those allocations in the submitted Plan cannot change, and neither can the assessment of need for Shropshire’s purposes. It follows that sites additional to those in the submitted Plan are required.
- 8.3.11. ID36 § 19 noted that the rejection of P26 Amended and P26 Amended v2 in the July 2023 SA was unjustified because the rejection was on the basis of there being non-green belt locations to meet the provision for the Black Country. The Inspectors noted the inconsistency of that conclusion with the proposed allocation of green belt sites SHF018b and SHF018d to accommodate Black Country employment needs. The Inspectors call for the assessment of reasonable alternatives to SHF018b and SHF018d in the green belt.

- 8.3.12. ID36 § 21 found it illogical that availability, size and strategic suitability criteria had not been updated to reflect the specific assessment exercise of seeking sites to meet Black Country needs as opposed to Shropshire needs.
- 8.3.13. ID36 §23 – The principles that we [the Inspectors] have indicated that need to be followed in the SA work obviously apply equally to other sites, not just those of interest to Aardvark.
- 8.3.14. It is clear therefore that the Inspectors are expecting the Council to consider a range of additional sites in terms of their suitability to meet the particular needs of the Black Country.
- 8.3.15. BRE suggest that, in addition to considering other green belt sites with less harm to the green belt, GC44 should also consider other green belt sites that have the potential to perform more strongly than the Council's proposed site against relevant environmental, economic and social objectives. Reasonable alternatives would be expected to include sites which the Council knows to be available and promoted for the specific purposes of accommodating the provision of housing and employment for the Black Country. Reasonable alternatives would also include sites which the Council has previously declined to allocate in the Plan for the sole reason of lack of exceptional circumstances to justify the release of land from the green belt. If the Council has concluded (as it has) that green belt release is necessary to accommodate the employment provision for the Black Country, the most obvious site to consider would be the one which the Council no longer has any reason to reject, being land at J3.
- 8.3.16. ID37 §71 – The Inspectors are content with the work done to consider the broad geographical area of search from within which to meet the Black Country need. The Inspectors gave no endorsement of the other features of the Council's explanation at GC41 §5.6 regarding preferred locations within the broad geographic area.
- 8.3.17. ID37 §7.2 – The Inspectors are content with the Council's explanation that all available sites have been assessed as part of the additional work. [It follows that those sites should be objectively considered with regard to appropriate criteria and methodology.]
- 8.3.18. ID37 §7.3 – However, the Inspectors raise a question of whether additional green belt sites have been assessed to consider whether any that could meet the need would have less harm than the SHF 18b and SHF018d sites. [We suggest that the exercise should also consider whether any other green belt site can better meet the need. The level of harm to the green belt should then be weighed within the SA to determine the preferred site.]
- 8.3.19. ID37 §7.4 – States that further discussion on the filtering process employed at Stage 2b of the SA process can take place at further hearings if necessary. [We note that the Council's explanation of the filtering at Stage 2b set out at §5.15 – 5.16 of GC41 describes a simplistic exercise without regard to factors related to the Black Country need. This is unchanged in GC44]
- 8.3.20. ID37 §7.5 and §7.6 – States that further discussion on the SA assessment process at stage 3 including the consideration of alternative sites in the green belt can take place at further hearings if necessary.

- 8.3.21. We note that the Council is content that it has considered all site options within the green belt; the question, however, is whether the process by which the sites have been assessed is appropriate. We note that GC41 §5.19 states that the SA (then referring to GC29, but we believe the same applies to GC45) explicitly consider the result of the Green Belt assessment and review undertaken to inform the preparation of the draft Shropshire Local Plan. We have significant concerns regarding the green belt assessment process and the way in which it has been taken into consideration in the assessment of alternative sites.
- 8.3.22. It is clear from the statements at GC41 §5.19, §5.22 and GC46 §4.17 – 4.20 that no new assessment of green belt contribution or re-assessment of conclusions from the green belt assessment has been undertaken as part of this exercise. The assessment of green belt contribution and harm is entirely carried forward from the exercise undertaken previously when considering Shropshire’s needs only. As a result, the Green Belt assessment continues to inaccurately assess the BRE J3 site through the consideration of unrepresentative land parcels.
- 8.3.23. Importantly, the Green Belt Assessment fails to take account of the fifth of the five purposes of green belt on the misconception that it is scored equally for all sites and all purposes.
- 8.3.24. The fifth purpose of green belt is to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land. In our opinion, the value of land for this purpose of green belt depends at least in part upon the purpose of development which is being considered. If for example a strategic employment development is being considered, which requires a location where it is readily accessible from the motorway network, with a minimum size and level ground to accommodate large floorplate buildings, and it requires a location in a specific geographic area, those factors are relevant to the assessment.
- 8.3.25. The ability of green belt land to assist in urban regeneration will only be relevant to development which is able to be accommodated within the urban area. A site which is being considered only for the strategic employment development will not contribute to urban regeneration, because if the development is not allocated to that site, the development will not then go to the urban area. By contrast, land which is considered for development for a range of purposes including housing which is sub-divisible, and local scale employment which has smaller building sizes and does not have a motorway accessibility requirement will be able to locate in the urban area if green belt land is not released (and there are suitable sites within the urban area). For example, therefore, land at Shifnal which has been assessed for purposes of providing land for Shropshire’s needs, will have a positive value in respect of green belt purpose 5, whereas land such as that at J3 which has not been proposed to accommodate local needs but strategic needs only, does not have a value in the context of green belt purpose 5. The absence of any assessment of green belt purpose 5 in EV 050 therefore ignores a relevant consideration and distorts the assessment as a result. Those results are carried forward to this assessment.
- 8.3.26. GC41 §6.5 – 6.6 seeks to justify the site selection process undertaken in GC29 (now carried forward to GC44). We note that Question 10 did not seek response on the adequacy of that process and the Inspectors’ reply in ID37 §8.1 did not provide any.

- 8.3.27. GC46 carries forward the assessment from EV051 of the Exceptional Circumstances Statement for the Shifnal sites proposed for allocation in the green belt in the Submission Plan which are now part proposed for allocation for the Black Country's needs. EV051 §8.44 identifies SHF018b as Parcel P14 and SHF018d as Parcel P13. Table 8.49 summarises the contribution of P14 as Purpose 2 – moderate and Purpose 3 – moderate, whilst P13 is summarised as Purpose 2 – moderate and Purpose 3 – strong. The harm to the green belt from the release of the sites is summarised for P13 as High, and P14 as Moderate – High.
- 8.3.28. The assessment that there are exceptional circumstances justifying the release of P13 and P14 is set out throughout EV051 chapter 8. That section is summarised at GC46 §9.23. Although based on Shropshire's needs, the circumstances put forward have many parallels when considering the needs of the Black Country. These include: supporting and encouraging a younger population in the east of the County; being within commuting distance of the Black Country and therefore allowing growth to seek to capture Black Country migrants; supporting the step change in the Shropshire economy sought by the Shropshire Economic Growth Strategy (which includes as a priority working closely with the WMCA area); ability to build on its strategic location due to proximity to motorway junctions; the potential to support supply chain companies which supply other businesses within Shropshire, particularly Bridgnorth, and similarly support businesses in the Black Country, and its potential to support the wider sub-regional economy. Reliance is placed on the M54 Strategic Corridor Study and interest reported from business due to the location in the M54 corridor.
- 8.3.29. The justification for proposing the release of land causing high harm to the green belt is simply the scale of proposed land release proposed in order to meet immediate and longer term needs of the town (EV051 §8.149).
- 8.3.30. All of these factors could be applied to the BRE J3 land in the context of considering justification for release of land for the Black Country. If the sites are compared, the justification for release would be stronger for the BRE J3 site. J3 has better strategic highway links, being much closer to the M54 junction and having trunk road access along its boundary where as the Shifnal sites are access along a minor road passing through the J3 site. J3 is a higher quality site, is more prominent, is better related to the Black Country, has the potential to accommodate housing and employment together for the Black Country, is a closer and more easily accessible location, will deliver transport infrastructure improvements and will deliver significant countryside accessibility and biodiversity enhancements providing a high quality location for employers.
- 8.3.31. GC46 §9.24 summarises the exceptional circumstances for release of part of the Shifnal sites to provide for the needs of the Black Country. All of the points A – E apply equally or more so to J3.
- 8.3.32. It is simply not accurate therefore for the Council to conclude in the SA (Stage 3 - Appendices 8 and 10) that there is an exceptional circumstance case to release part of the Shifnal sites for Shropshire needs and to release the remainder of the Shifnal sites for Black Country needs but to conclude that there is no exceptional circumstance case to release the J3 site for Black Country needs.
- 8.3.33. Neither can it be said that the Council has weighed objectively the harm to the green belt in making its assessment.



- 8.3.34. EV050.06 is the Council’s Green Belt Review for J3. The east side of Parcel P8 and west side of Parcel P25 are the locations where employment development is proposed at J3. The whole of P8 is assessed as having a strong contribution to purpose 3, but weak or no contribution to the other assessed purposes.
- 8.3.35. The whole of P25 is assessed as having a moderate contribution to purpose 3 and weak or no contribution to the other purposes assessed.
- 8.3.36. P26 contains no part of the J3 site.
- 8.3.37. The summary of harm arising from release of the parcels assessed in EV050 is P8 high and P25 moderate – high. These assessment scores are the same as for the Shifnal sites P13 high and P14 moderate - high. However, closer inspection of the date reveals that the J3 proposals would have a lesser impact on the green belt than the Shifnal sites.
- 8.3.38. The contribution of the respective parcels to the purposes of the green belt as assessed by EV050 is summarised in the table below.

8.3.39. Table 1: EV050 Assessed Values of Relevant Parcels

Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
P8	none	weak	strong	weak
P25	none	weak	moderate	none
P13	none	moderate	strong	none
P14	none	moderate	moderate	weak

- 8.3.40. The table shows that, of the four parcels, P25 is the lowest value to the purposes of the green belt. The other three are broadly equal. The EV050 broad conclusions on impact overstate the value of P25 relative to P14.
- 8.3.41. The difference between J3 and the Shifnal sites is still greater because all of the P13 and P14 parcels are proposed for development and therefore the full scale of the loss of those parcels from the green belt will be realised. However, the J3 proposal for employment, with which the Shifnal sites should be compared, will require only part of parcels P8 and P25, meaning that the assessment based upon their total loss from the green belt and total development is over-stating the impact.
- 8.3.42. Furthermore, detailed analysis of the J3 site impact on the green belt has been provided in the Tyler Parkes Green Belt Assessment of the J3 site submitted with BRE’s Regulation 19 representations.
- 8.3.43. There is therefore no sound reasoning within the SA for rejecting the J3 site and preferring SHF018b and SHF 018d to J3 to meet the Black Country needs and concluding that there is an exceptional circumstances justification for the release of the higher harm green belt land in Shifnal, whilst stating there is no exceptional circumstance case to justify the release of land at J3.

- 8.3.44. Further points in favour of allocating J3 to meet the agreed provision for Black Country need are as follows:
- 8.3.45. The M54 Growth Corridor Strategic Options Study, EV072, recommends that the site at J3 be prioritised to drive forward the Council’s objective of economic growth, whilst also delivering balanced employment and residential growth⁶. J3 is prioritised by EV072 because it will provide fit for purpose employment land that meets the needs of modern occupiers and responds to market demand. The Study concludes that a strategy which includes prioritising J3 will assist in diversifying the economy by attracting occupiers in higher value sectors that drive economic productivity and retain talent in the County. EV072 also concludes that a balanced approach to economic and housing growth is the best means to support exceptional circumstances for green belt release. EV072 Table 5.1 states that the Garden Village proposals at J3 directly respond to Shropshire’s economic vision of balanced employment and housing growth in an accessible location. Table 5.1 also states: “The Study recognises that substantial economic benefits would arise from the development [of J3] coming forward as a strategic employment site that targets occupiers in key growth sectors and its close proximity to RAF Cosford and its provision of education and training. The site could also contribute significantly to the realisation of Shropshire’s economic growth ambitions as it would provide both employment and residential development.”
- 8.3.46. EV072 states that the employment offer to meet strategic needs should be distinguished from, and not be in competition with, offer provided locally⁷. As the SHF018b and SHF018d sites have been identified in the submitted Plan to meet local Shropshire needs, it is evident that those sites are not appropriate to meet the strategic needs of Black Country provision.
- 8.3.47. The Consultation on Strategic Sites (2019) states that further evidence and justification is required to enable the site at M54 J3 to be preferred for development. That further evidence and justification has been provided through the examination process and the Inspectors letters ID28, ID36 and ID37 to date. It is highly relevant that, at the time of the Consultation on Strategic Sites, the decision to make provision for Black Country needs for either housing or employment had not been made. As has been found by the Inspectors, the Plan as submitted and its SA did not take account of specifically meeting the needs of the Black Country through the provision of 1,500 dwellings and 30ha of employment land as the Council has agreed to do. The evidence and justification for proposing allocation of land at J3 is now very substantially greater than it was when the Consultation on Strategic Sites was carried out. The fact that the Council considered the J3 site to be “a once in a generation opportunity to meet cross boundary needs through delivery of nationally significant employment opportunities, high quality housing and a local centre to provide services, facilities and infrastructure as part of a planned new settlement within an important strategic corridor”⁸ are factors that should weigh heavily in the consideration of how to meet the agreed provision for the Black Country.
- 8.3.48. GC44 is required to assess the likely significant effects on the environment of meeting the agreed Black Country needs in addition to the submitted Shropshire needs. In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, that exercise requires account to be taken of

⁶ M54 Growth Corridor – Strategic Options Study June 2019: Executive summary

⁷ Ibid: para 5.4

⁸ Shropshire Local Plan Review: Consultation on Strategic Sites July 2019 – para 3.26

the objectives of the plan as well as its geographical scope. The objectives of the plan are not set out as a distinct list. The objectives must therefore be inferred from the Strategic Policies and from the statutory and national policy requirements of plan making. This includes at Submission Plan 3.6, 3.16-3.17, 3.22 and 3.28:

8.3.49. For housing

- to support wider aspirations, including increased economic growth and productivity

8.3.50. For employment

- to maximise our economic potential;
- to increase productivity by utilising the benefits of our special environment and high quality assets;
- to encourage appropriately located high quality new employment development in order to implement the aspirations of the Economic Growth Strategy for Shropshire
- to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work.
- To prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections. The strategic corridors include the M54.

8.3.51. By agreeing to make provision to contribute to the needs of the Black Country, it also must follow that providing housing and employment land in locations and configurations and of a quality which meets the needs of the Black Country must also be an objective of the Plan to be taken into account in the SA.

8.3.52. The Council's explanation of its approach set out in GC41 (paras 5.1 - 5.6, 5.18 - 5.20, 6.5 – 6.6) in respect of GC29 applies to GC44 which has retained the same approach. That explanation highlights significant shortcomings of the stage 2b and stage 3 assessments due to the fact that the updated SA follows the same approach and same consideration of factors as the previous SA. It continues to have regard only to factors relevant to Shropshire considerations and not to the specific Black Country purposes. The factors applied to the final stage 3 assessment are the most critical. These are set out in the individual site assessments in GC44 appendices 3 – 10.

8.3.53. The approach taken by the Council in its review of the SA and in its response to the Inspectors Interim findings ID28 and subsequent correspondence has not been to use the SA genuinely as a tool to test and inform plan proposals. Instead, GC44 appears to have been written to conclude, in accordance with the Council's position of 20th July 2020 and 7th December 2020, that no new sites would be required to make the provision of 1,500 dwellings and 30ha for the Black Country. The Cabinet report for the employment land stated that the 30ha provision was justified as being able to be counted as part of the already agreed growth for Shropshire's needs and would not require the identification of additional land

(Council's emphasis)⁹. We have not been able to find the 20th July 2020 and 7th December 2020 Cabinet reports within the evidence base, we therefore enclose them here for ease of reference.

- 8.3.54. The Council committed to a position in respect of the housing and employment provision for the Black Country on those dates which it appears to be unwilling to reconsider its position.
- 8.3.55. The same July 2020 and December 2020 Cabinet reports both referred to the land promoted by BRE at M54 J3 for (as reported then) around 3,000 dwellings and 50ha of employment land. In July 2020 the decision was made to not allocate the site in the Pre-Submission Plan. That reason was solely that there was insufficient justification to progress an exceptional circumstances argument to release the land from the green belt. The same reason was re-stated in December 2020.
- 8.3.56. The analysis of strategic sites P26 Amended and P26 Amended V2 in GC44 Appendix 10 (pages 8 and 12 respectively) continues to state that there is insufficient justification to progress an exceptional circumstances argument for the release of this land from the green belt. However, the same 'Reasoning' section states that there are other green belt locations more appropriate to accommodate the Black Country employment needs. It follows that there must be an exceptional circumstances justifying the release of land from the green belt to meet the Black Country employment needs. The need to make provision for the Black Country is accepted by the Council. It is the inability to meet that need on land which is not within the green belt which gives rise to the exceptional circumstances.
- 8.3.57. Having established that exceptional circumstances exist to justify the release of land from the green belt the correct approach should then be to consider all reasonable alternatives to meet that need. As guided by the Inspectors, that and the Environmental Assessment of Plans Regulations, that assessment should be made with regard to the Plan objectives and criteria specific to the need as discussed above. The merits of each potential site in respect of their ability to meet the identified need, and the respective harm to the green belt of each site should be assessed in GC44. The lack of exceptional circumstances cannot be a consideration in that assessment, as it has already been established that there are exceptional circumstances justifying the release of land for that purpose. It appears, therefore that, the J3 site has not been considered objectively or fairly as an alternative to SHF018b and SHF018d through GC44.
- 8.3.58. The summary of sites at Appendix 10 includes in respect of P26 Amended and P26 Amended V2 significant positives as well as negative observations. There is, however, no explanation of how these factors have been weighed.
- 8.3.59. The factors that have been taken into account in the assessment of alternative sites in GC44 are all focused on Shropshire. The factors upon which the assessment is based are not measures specific to the Black Country need and by which the benefit of the development to the Black Country can be assessed.
- 8.3.60. GC44 para 5.1 – 5.2 lists the previous Sustainability Appraisals which are noted as being evidence relevant to this Additional SA. This includes using the same SA objectives and assessment framework

⁹ Shropshire Cabinet Report 7th December 2020 para 5.24

as used for the Regulation 19 Pre-Submission Draft Local Plan. Those SA objectives are not appropriate to assess provision for the Black Country's needs. The assessment factors from the previous SA have been carried across to the assessments undertaken at stage 2 and stage 3. The previous identified by the Inspectors of the SA not taking account of the Black Country need continue to apply in this regard.

8.3.61. The assessment of J3 is made with regard to land parcels which are larger than the BRE proposed development site and inaccurately represent it. For example:

- The green belt quality assessments take account of wider land beyond the BRE site;
- The landscape considerations relate to extensive areas of land beyond the BRE site;
- The ecology comments relate to extensive areas of land beyond the areas that BRE propose for development;

8.3.62. There continues to be no objective assessment of the BRE J3 site and the ability to meet Black Country needs and stated relevant objectives of the Plan have not been taken into account at all. The reasoning for rejecting the P26 Amended and P26 amended v2 sites on the basis of there being insufficient exceptional circumstances continues to be a false statement.

9. GC46 Updated Green Belt Topic Paper

9.1. Objection

9.1.1. The Green Belt Topic Paper only reports conclusions rather than informing the site selection process to meeting Black Country needs. As such, it is not justified.

9.2. Changes Sought

9.2.1. The Green Belt Topic Paper should assess accurately the green belt credentials of alternative sites that meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, being sites which take account of the objectives of the plan as well as its geographical scope. The results of that assessment should be fed back into the SA which should assess the relative merits of each alternative site to meet the needs of the Black Country weighed together with the level of harm to the green belt.

9.2.2. The Green Belt Topic Paper should state that exceptional circumstances exist to meet the employment needs of the Black Country as it is the Council's evidence that those needs cannot be met on land outside the green belt.

9.2.3. The Green Belt Topic Paper should respond to the re-assessment required of the Housing and Employment Topic Paper, which needs to consider whether there is land available to meet the increased requirement for housing that these representations have identified.

9.2.4. If the outcome of that exercise is that green belt land is required or green belt land could best serve meeting the housing needs of the Black Country, the Green Belt Topic Paper should assess accurately the green belt credentials of alternative sites suited to meeting that need, taking account of the objectives of the Plan as well as its geographical scope. The results of that assessment should be fed back into the SA which should assess the relative merits of each alternative site to meet the needs of the Black Country and the level of harm caused to the green belt.

9.3. Explanation

9.3.1. GC46 §4.17 – 4.20 reports that the SA has been undertaken which has identified 4 sites to meet the Black Country need, only one of which is green belt. It is clear therefore that GC46 has performed no role in informing the SA; it has been written following the conclusion of the SA and the conclusion of which site to allocate for the employment provision for the Black Country. It is a post-decision rationalisation of exceptional circumstances. The combination of GC44 and GC46 is that the exceptional circumstances proposed in respect of SHF018b and SHF018d are unique to that site, or weigh more heavily in favour of that site. There is no justification for such an approach. The exceptional circumstances are the need to provide for the Black Country in a suitable location and with a suitable quality of site and an inability to do so from land not within the green belt. Those exceptional circumstances apply to all suitable sites. The final assessment of which site should be preferred should be made by the SA through the weighing of the respective benefits of each site with its respective harms as required by the Regulations. GC46 highlights the failing in the Council's approach to the exercise,

which has been to select the site first and not to objectively weigh the respective benefits (taking account of appropriate Plan objectives) with respective harms.

- 9.3.2. We have set out more detail of the shortcomings of the assessment of relative green belt harms in our objections to GC44, along with the failings in the consideration of appropriate Plan objectives.
- 9.3.3. GC46 does not therefore adequately respond to the Inspectors request at ID28 §23 for clear and distinct assessments of the exceptional circumstances for releasing green belt for Shropshire's needs and separately for Black Country needs. The stated justification for Black Country needs is aligned to a single site and motivated by predetermined objective of allocation of that particular site as set out in the Shropshire needs justification carried forward from EV051 (December 2020). For reasons we have set out in representations to GC 44 and GC45, the Council was motivated to not allocate any additional sites and has therefore sought to make the existing sites fit the Black Country purpose. There is no explanation in GC46 as to why the exceptional circumstance that previously existed to allocate the whole site for Shropshire's needs is now considered to have fallen away.
- 9.3.4. GC46 should be utilised as an important component of the site selection process to meet Black Country needs, but that approach has not been taken. The scope required of GC46 needs to respond to the outcome of the further revisions that we say are required to GC45, to consider the increased requirements for housing and employment including increased requirements for the Black Country. The outputs from GC46 should feed back into the SA before a final decision is made on the site(s) to allocate to meet the Black Country needs.

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To

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Examination of Local Plan
c/o Kerry Trueman
Programme Officer
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Copy

Shropshire Council FAO Eddie West, Interim Planning Policy and Strategy Manager
By email edward.west@shropshire.gov.uk

24 April 2024

Dear Sirs

**Shropshire Council: Examination of Local Plan
CPR PART 54 AND PRE-ACTION PROTOCOL**

We are instructed by Bradford Rural Estates Limited (“BRE”). We write further to our pre-action protocol letter dated 15 August 2023 (the “PAPL”) and the Council’s purported response dated 14 September 2023 (the “PAPL Response”), document ID36 being the Inspector’s views on the PAPL dated 4 October 2023 (“ID36”) and the Council’s response dated 16 November 2023 (“GC41”), and our further comments dated 8 December 2023. We also note the Inspector’s response to GC41 dated 16 January 2024 (“ID37”).

We write specifically in the context of the meeting of the Cabinet of the Council on 17 April 2024 and its resolution to proceed as reported at the meeting with consultation upon:

1. Sustainability Appraisal Report (April 2024)
2. Housing and Employment Topic Paper (April 2024)
3. Green Belt Topic Paper (April 2024)

Drafts of these documents were appended to the cabinet papers at Appendices 2-4 respectively. We have also had regard to the report to Cabinet. We note that although no authority to do so was sought in the report to members that before the consultation is begun the report and topic papers will be submitted to the Inspectors for comment.

We note the Inspectors comments in ID37 as to what the report and topic papers are required to do in order to lead to a sound plan.

We note the Council's proposal to only increase the requirement for dwelling in the plan by 500 and the quantum of employment land by 20 hectares, whilst at the same time accepting the need, pursuant to the SOCG, to accommodate 1500 dwelling and 30 hectares of employment land, resulting in a net reduction of dwellings and employment land to meet Shropshire needs of 1,000 dwelling and 10 hectares respectively.

We also note the Council's proposal not to allocate any further sites to meet either its own need or Black Country needs and that the Council's sole measure to increase land supply both for housing and employment is to adopt a revised and greater allowance for windfall delivery. We consider this to be fundamentally flawed and that it neither meets the requirement of the Inspectors set out in ID37, the requirement to assess in sustainability terms meeting neither Black Country nor Shropshire needs, fails to practically address meeting Shropshire and Black Country needs either in a sustainable way, or at all, and fails to comply with the law and will not lead to the production of a sound plan.

Furthermore, we note (in no specific order):

No investigation has been undertaken to ascertain whether more than 1500 dwellings and 30 hectares of employment land could be brought forward, sustainable, to meet Black Country needs.

There is no evidence to suggest that circumstances have changed since the original windfall rates were assumed to justify any change to the revised windfall assumption. The changed assumption has been made solely to meet the Council's apparent objective (based in our observation of the Cabinet meeting) of purporting to meet an increased requirement without allocating any new sites. This is unlawful.

There is no evidence that windfall sites, in line with the revised windfall assumption, will actually come forward either for dwellings or employment at all, or that they will come forward in locations that will meet either Shropshire, or specifically Black Country needs, in sustainable locations or in a sustainable way. A defect in the strategy is that if windfall sites are to come forward to meet residential needs on the scale required (over and above those windfalls previously assumed), they are likely to come forward on former employment sites, leading to a reduction in available employment land, which has not been taken into account in considering employment land supply. In addition, it is a characteristic of windfall sites that

they are unplanned and usually come forward piecemeal on constrained sites that are not able to accommodate all the infrastructure needed to support the development – the relative sustainability in terms of matching development with its supporting infrastructure versus fully planned developments has not been assessed or taken into account. The proposed increase in the windfall allowance fails to have regard to the new requirement for biodiversity net gain. This is a serious challenge to deliver on constrained urban sites and reduces the likelihood that sites will come forward either at all, or at the densities previously assumed. In the light of biodiversity net gain windfall allowances should be reduced not increased.

Because the increased requirement to meet Black Country needs on top of Shropshire needs is intended to be addressed on windfall sites that have not yet been identified, the locations and sustainability characteristics cannot be properly assessed in terms of meeting Black Country needs. The sites to meet Black Country housing needs are previously allocated sites in Bridgenorth, Shrewsbury and Ironbridge, and for employment it is a previously allocated site in Shifnal. In all cases the sites have already been identified as meeting Shropshire needs. They cannot meet both.

No exercise has been undertaken by the Council to consider qualitatively whether the Shifnal employment site will meet Black Country needs either at all or in a sustainable way. No exercise has been undertaken to assess the relative merits in sustainability or other terms of the Shifnal site to meet Black Country need. We note that the Shifnal site is a green belt site and hence those relative merits should be considered against other green belt sites with potential. We support the general location of the places of Albrighton and Shifnal as being suitable locations to meet Black Country employment land needs, but no exercise has been undertaken to assess the relative merits of meeting Black Country needs either at all or in a sustainable way on other candidate sites in those places. In particular the J3 site previously consulted upon at the strategic sites stage has not been reconsidered in any meaningful way other than to be ruled out as being inferior in location terms to the proposed Shifnal, but without any evidence to support that conclusion in sustainability terms or otherwise.

Furthermore, no consideration has been given to the sustainability advantages of co-locating the housing and employment requirement to meet Black Country needs in a single location. This is a serious omission, especially as the candidate site at J3, which has previously been consulted upon, offers that potential. There is simply no evidence for ruling it out, and to rule it out without any evidence undermines the sustainability assessment, the evidence base for the plan, the soundness of the plan and is unlawful.

Yours faithfully



Sebastian Charles

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Site-Specific Green Belt Review
Land at Junction 3, Shropshire
5th September 2019

11298/R03/EF/RH





Revision	Date	Author / Checked
11298_R03	22/08/2019	EF/xx

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1 Introduction & Site Context

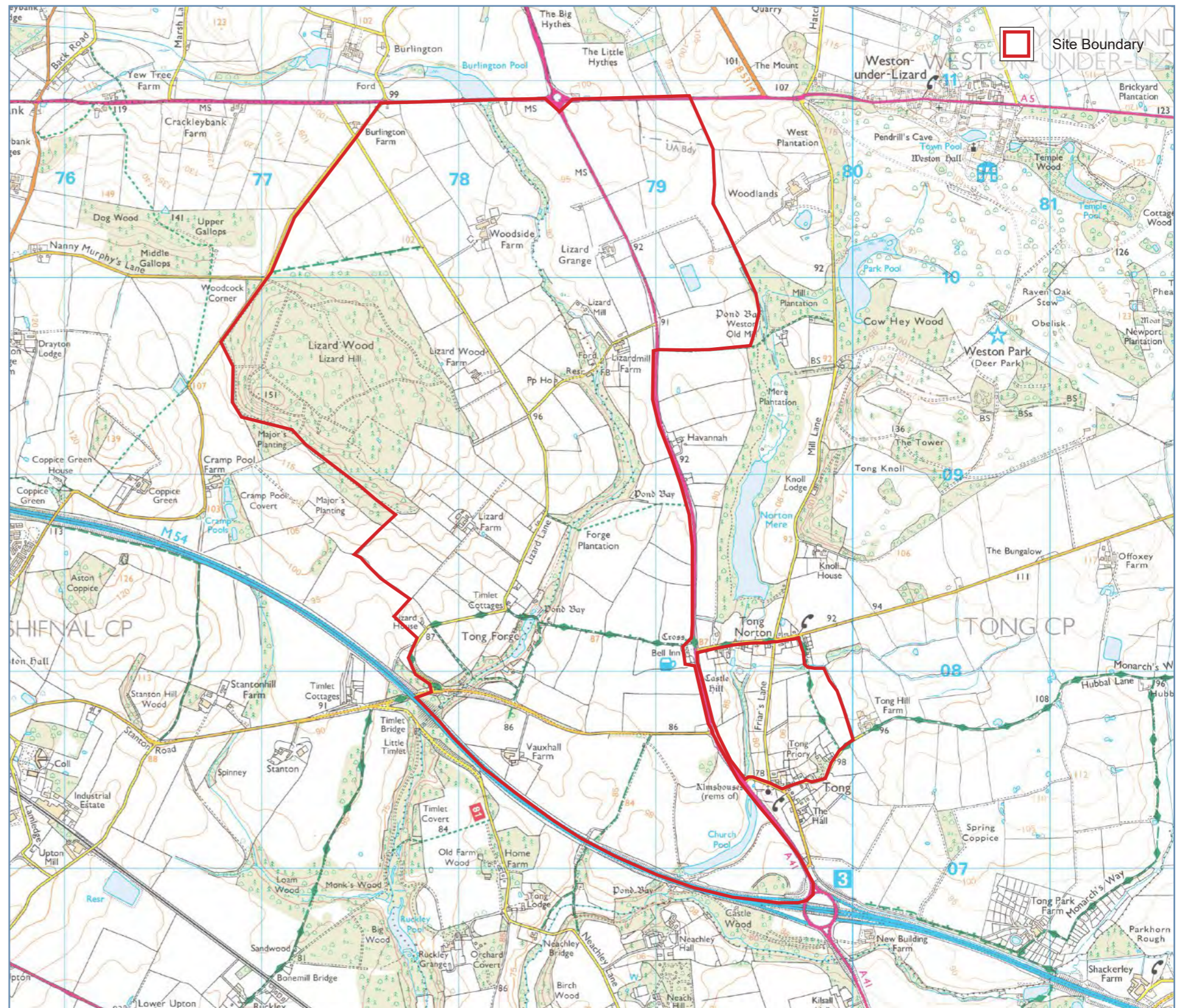
Background

- 1.1 Tyler Grange have been appointed by Bradford Rural Estates Ltd to undertake a site-specific Green Belt review of land north of Junction 3 of the M54, Shropshire. The review has been prepared to support the continuing promotion of the site within the emerging local plan and strategic location within the M54/A5 Strategic Corridor “Growth Zone”. The location of the site is illustrated on **Plan 1: Site Location**.
- 1.2 The Councils part 1 Green Belt Assessment (2017) and part 2 Green Belt Review (2018) of the Junction 3 Opportunity Area did not sub-divide the land to the north of the M54 (including the site area) into individual parcels of land. Instead, the whole area was deemed as inappropriate for release due to the high level of harm identified. This did not allow for the sub-division of the area into the parcels assessed within the Stage 1 and 2 studies, or the further sub-division of the site into discreet parcels that may be suitable for development and release from the Green Belt. This is despite the land to the south of the M54 being sub-divided and assessed as two further options.
- 1.3 Addressing the above, Tyler Grange’s site specific Green Belt Review employs the same methodology adopted by the Council and used by LUC within the Stage 2 Green Belt Review.
- 1.4 LUC’s methodology and approach allows for the recognition of smaller parcels and assessment for these both in terms of their contribution to the Green Belt and their suitability for development and release within the Opportunity Areas.
- 1.5 The site-specific review provides a more detailed analysis than the Council’s Study, utilising photographs, aerial images and site-specific / sub-parcels assessment to provide a robust assessment. Detailed consideration is also given to the opportunities and constraints to development using plans and photographs to inform the development of the masterplan.

Site Context

- 1.6 The site is located to the east within the Shropshire Borough Council administrative area. The settlement of Shifnal is situated approximately 2.5km to the west of the site, whilst to the south east Cosford is approximately 1km away and Albrighton 2.5km.
- 1.7 The site area covers approximately 700 ha of primarily agricultural land managed for arable farming which contains associated farmsteads, belts of woodland, field boundaries, and road infrastructure (see **Image 1** overleaf).

Plan 1: Site Location 12298_P02



1 Introduction & Site Context

- 1.8 The site is contained to the south by Junction 3 of the M54 motorway beyond which lies a mix of arable farmland and blocks of woodland associated with the hamlet of Ruckley. To the north, the site is edged by the A5 which connects the site to Cannock in the east and Telford in the west.
- 1.9 The A41 / Newport Road runs through the site and edges it to the east, serving as a primary connection between Junction 3 to the south and the A5 to the north (see **Image 2**).
- 1.10 The Weston Park stately home with its approximately 400 ha of parkland sits to the east of the site, although it is not visible from any point within the site due to intervening vegetation and belts of woodland.
- 1.11 To the west, the site is overlooked by Lizard Wood which sits on higher ground and forms a prominent feature within the wider landscape (see **Image 3**).
- 1.12 Tong and Tong Norton, two small villages, are located within the site to the south east with paddocks separating the two (see **Image 4**). St Bartholomews Church in Tong forms a distinctive feature in the local landscape to the south of the site.
- 1.13 The River Worfe runs directly through the site from north to south. Whilst the river itself is not necessarily a substantial body of water, it is surrounded and contained by a belt of mature woodland planting which essentially separates the site into two areas - one edged by the A41 to the east and the other by Lizard Wood to the west (see **Image 5**).
- 1.14 The site is traversed by a number of public footpaths which connect recreational users to the wider area. Most notably the Monarch's Way, a long distance recreational route, traverses between Tong and Tong Norton before running from east to west through the site.
- 1.15 Generally, the site has a bowl like topography which troughs at the River Worfe and plateaus to the east and west in Tong and at Lizard Wood respectively.
- 1.16 Lizard Lane runs down the site and generally signals where the land to the west of the road begins to incline at a steeper gradient up towards Lizard Wood.
- 1.17 Given the large scale of the site, it encompasses different areas / parcels of land which each have unique characteristics and visual circumstances and should each be assessed on their own merit.

- 1.18 Even though it is a broad assessment, differences in character throughout the site are acknowledged by The Shropshire Landscape Typology (2006). The key characteristics from each of the site's comprising character areas are listed overleaf with the character areas illustrated on **Plan 2: Landscape Character**.



Image 1: The site comprises predominantly agricultural fields used for arable farming.



Image 2: The A41 / Newport Road contains the site to the east.



Image 3: The site is overlooked by Lizard Wood to the west.



Image 4: Tong and Tong Norton sit within the site to the south east.



Image 5: The River Worfe with associated woodland planting runs through the site from north to south.

1 Introduction & Site Context

The Shropshire Landscape Typology (2006)

Estate Farmlands

- Mixed farming land use
- Clustered settlement pattern
- Large country houses with associated parklands
- Planned woodland character
- Medium to large scale landscapes with framed views

Enclosed Lowland Heaths

- Undulating lowland
- Impoverished, freely draining soils
- Planned woodland character
- Dispersed settlement pattern

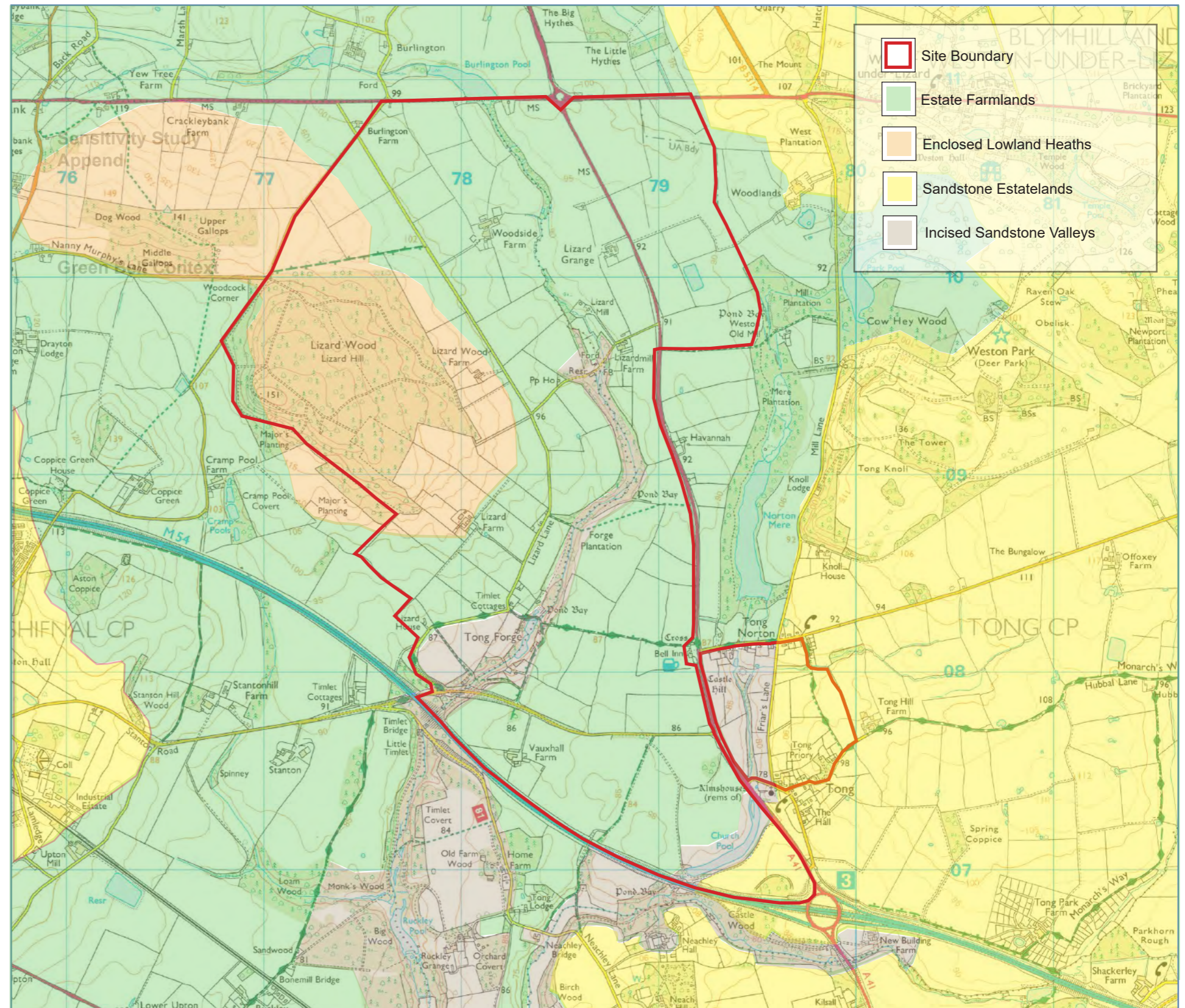
Sandstone Estatelands

- Arable land use
- Regular field patterns
- Parkland with associated country houses
- Clustered settlement pattern
- Medium – large scale, open landscapes

Sandstone Estatelands

- Shallow, steep sided valleys
- Planned woodland character interlocking estate plantations
- Linear tree belts along watercourses
- Clustered settlement pattern
- Parklands
- Small-medium scale landscape with filtered views

Plan 2: Landscape Character_12298_P03



2 Purpose and Methodology

Shropshire Green Belt Assessment: Stage 1 (2017)

2.1 The Shropshire Green Belt Assessment, 2017, assessed land across Shropshire against the Green Belt purposes to establish the relative performance of the Green Belt across the County against the 5 Green Belt purposes:

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.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2 The assessment criteria employed for each purpose are appended at the rear of this report (**Appendix 1**), and have been used within our own methodology.

2.3 The ratings that were applied to each criterion were as follows:

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

2.4 The 2017 Assessment recommended that a further Review of the Green Belt was undertaken to identify locations and sites that may be suitable for release. The Stage 2 Review has since been prepared to undertake the next stage and provide an assessment of the potential harm to the Green Belt arising from release of land across Shropshire identified as growth areas.

2.5 The methodology employed by LUC when identifying strategic land parcels for assessment and their contribution to the Green Belt purposes is generally sound.

2.6 Despite this, the assessment relies upon a number of subjective judgements and does not include a set of measurable parameters. This introduces a degree of interpretation and lack of transparency and replicability in the assessment.

2.7 A finer-grain analysis of sites considered for release may allow for a more detailed consideration of how smaller parcels of land perform in relation to the Green Belt purposes; and

2.8 Furthermore, a Green Belt Review of sites / Opportunity Areas may also identify opportunities for releasing land, whilst preserving the function of the wider Green Belt and creating robust new Green Belt boundaries.

2.9 To summarise the findings of the Assessment of the land at Junction 3:

- None of the land was assessed as making a contribution to Green Belt Purpose 1 (to check the unrestricted sprawl of large built-up areas). This is due to the location of the land away from main towns and urban areas.
- None of the strategic parcels assessed made a greater than “weak” contribution to Green Belt Purposes 2 (to prevent neighbouring towns from merging into one another) and 4 (to preserve the setting and special character of historic towns).
- The methodology employed by LUC in the 2017 Assessment affords equal weight to Purpose 5 for all land assessed due to all Green Belt serving the objective of encouraging the recycling of derelict and other urban land through placing restrictions on development.
- The land within the site area was assessed as making a Moderate or Strong contribution to Purpose 3 (to assist in safeguarding the countryside from encroachment). This is due to the situation of the land away from main settlements.

Shropshire Green Belt Review: Stage 2 (2018)

2.10 The Shropshire Stage 2 Review assesses 29 ‘Opportunity Areas’ within the Green Belt in Shropshire against the Green Belt purposes. The review identifies the relative harm that may be caused to the Green Belt resulting from the release of land in these areas for development.

2.11 The Opportunity Areas were identified by the Council as broad locations around established settlements and strategic corridors. These meet with the spatial strategy for the emerging Local Plan, allowing the Review to test potential allocations for housing and employment development, as well as safeguarded land and to assess the potential impacts of promoted development locations in the Green Belt.

2.12 The Stage 2 Review includes an assessment of land at Junction

3 as a strategic location and part of the M54 / A5 strategic corridor “Growth Zone” identified by the Local Plan

2.13 The Development Strategy for the emerging local plan identified Junction 3 at the M54 as a potential growth area.

Assessment of Opportunity Areas

2.14 The assessment of Settlements and Opportunity Area is presented in four parts, namely:

- Part 1: Settlement / Area Context;
- Part 2: Parcel Assessments;
- Part 3: Opportunity Area Assessments; and
- Part 4: Conclusions

2.15 The methodology employed by the Stage 2 Review for each of these stages is detailed below:

Part 1: Settlement / Area Context

2.16 For the Opportunity Areas located away from settlements, including Junction 3, the Review provides appropriate strategic, economic and geographical context. This may include the anticipated potential future growth within each area, as defined by the Shropshire Council Preferred Scale and Distribution of Development consultation document (2017).

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

2.17 Part 2 assess the contribution of the Green Belt parcels identified in the Part 1 Assessment and identifies the potential harm resulting from the release of land.

2.18 The assessment includes the following stages:

Relationship to settlement / countryside

2.19 The assessment describes each of the parcels and identifies how they relate to the countryside, settlement or areas of significant development. This provides context to inform the assessment of the contribution to the Green Belt, identify alternative Green Belt boundaries and the likely harm resulting from release of land.

2 Purpose and Methodology

Assessment of Green Belt Contribution

- 2.20 This uses the same methodology as used in the Stage 1 Green Belt Assessment and draws upon that assessment.

Alternative Green Belt Boundaries

- 2.21 Consideration is also given to the nature of boundaries in relation to existing Green Belt edges or alternative boundaries when establishing whether they are “readily recognisable and likely to be permanent” (NPPF paragraph 139). This has also informed an assessment of how such boundaries may also affect the impact that release may have on adjacent Green Belt.

- Strong potential boundaries are defined by the Review as being: substantial watercourses and waterbodies; motorways, dual carriageways and railway lines;
- Moderate strength boundaries are identified as including: local roads; woodland; hedgerows; tree lines; streams and ditches; and
- Edges lacking clear definition on the ground from weaker boundaries.

- 2.22 For each of the parcels assessed, a commentary is provided on the nature of the existing boundary and any suggested alternatives.

Assessment of ‘harm’ to the Green Belt resulting from release of parcels

- 2.23 At paragraph 3.62, the Stage 2 Review states that:

“Without a clear definition of the scale, type and design of development which will come forward for development within a specific Green Belt location, the harm assessment is based on the assumption that the openness (in Green Belt terms) of a defined area will be lost. This approach ensures a consistent approach is adopted across the study area/ It was not possible to assess specific development proposals in a proportionate or consistent manner.”

- 2.24 This highlights one of the main limitations of the Stage 2 Review when identifying locations that may be suitable for release from the Green Belt. As set out in this report, when assessing the site area at Junction 3 there has been no consideration of opportunities and constraints and the extent of development that may be delivered on the site.

- 2.25 This, in turn has meant that the site area and associated parcels

have been identified as having a high level of harm to the Green Belt if developed and therefore mitigation measures and new Green Belt boundaries have not been given any further consideration.

- 2.26 For these reasons, including the lack of sub-division of larger parcels and / or recognition of defensible boundaries within them, the Stage 2 Review does not provide a detailed assessment of the development potential of the site.

- 2.27 Key Factors that have been identified that inform the assessment of Green Belt harm include the following:

- The contribution of the area of potential release / development to the Green Belt purposes;
- The potential implications of the loss of openness on the integrity of the wider Green Belt; and
- Consistency and strength of the Green Belt boundary / urban edge in relation to the potential area of Green Belt release / development.

- 2.28 The Review identifies that the relationship between these factors can vary significantly across a study area. Professional judgement was used to rate Green Belt harm using a 5-point scale (ranging from low to high) supported by a commentary on how the judgments have been made.

- 2.29 3.20. As stated at paragraph 3.68, the Review also considers: “... whether there are any scenarios for release of less than the full parcels (a sub-parcel) that would result in reduced harm to the Green Belt.”

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

- 2.30 Part 3 combines the findings of Parts 1 and 2 to identify the potential harm arising from the cumulative release of parcels as Opportunity Areas.

- 2.31 Where the analysis found that different parts of an Opportunity Area were likely to have different levels of harm, the findings reflect these with reference to the relevant parcel numbers or sub-parcel areas.

Assessment of harm to the Green Belt resulting from release of opportunity areas

- 2.32 As with the Stage 1 assessment, a rating of the level of harm was identified for each Opportunity Area, using professional judgement supported by a commentary.

- 2.33 Importantly, as stated at paragraph 3.74, consideration was also given as to whether releasing a smaller proportion of a full Opportunity Area (a Sub-opportunity Area) would result in reduced harm to the Green Belt.

- 2.34 The land north of the M54 at Junction 3 that includes the site area was not identified for sub-division, despite the large size of the parcels being assessed and their sub-division by recognisable boundaries and features.

Identification of Potential Mitigation and Boundary Enhancements

- 2.35 Release of land from the Green Belt and development should seek to minimise harm to the land retained in the Green Belt. This can be achieved through the following measures:

- Masterplanning;
- Ensuring Green Belt boundaries are clearly defined using recognisable and permanent features; and
- Positive uses for the wider Green Belt are secured.

- 2.36 The Stage 2 Review includes general guidance and identifies some design principles that may be applied to minimise potential harm to the Green Belt.

- 2.37 It is recognised that the mitigation measures are only draft guidance and there will be additional or alternative measures that could be identified if a decision to release land is made in the future.

- 2.38 It is also recognised by the Review that mitigation measures should also be considered alongside other sustainability considerations, including minimising effects on landscape and biodiversity.

Part 4: Conclusions

- 2.39 Finally, the assessment of harm for each Opportunity Area and, where relevant Sub-Opportunity Area is summarised. Consideration is also given to the potential impact of release of the Opportunity Areas on the strategic function of the West Midlands Green Belt.

2 Purpose and Methodology

Mitigation Measures

- 2.40 At Chapter 5 of the Stage 2 Review, a number of measures to mitigate harm to the Green Belt are set-out. These include the following:
- Landscaping and strengthening boundaries;
 - Defining Green Belt edges with strong, natural elements that form a visual barrier, i.e. woodland belts;
 - Create transitions from urban to rural using density, height, materials and landscaping to create a permeable edge;
 - Enhance visual openness within the Green Belt;
 - Preserve / enhance landscape elements which contribute to the setting of historic settlements;
 - Enhance access within the Green Belt; and
 - Improve management to enhance countryside character.

Beneficial Use of Green Belt

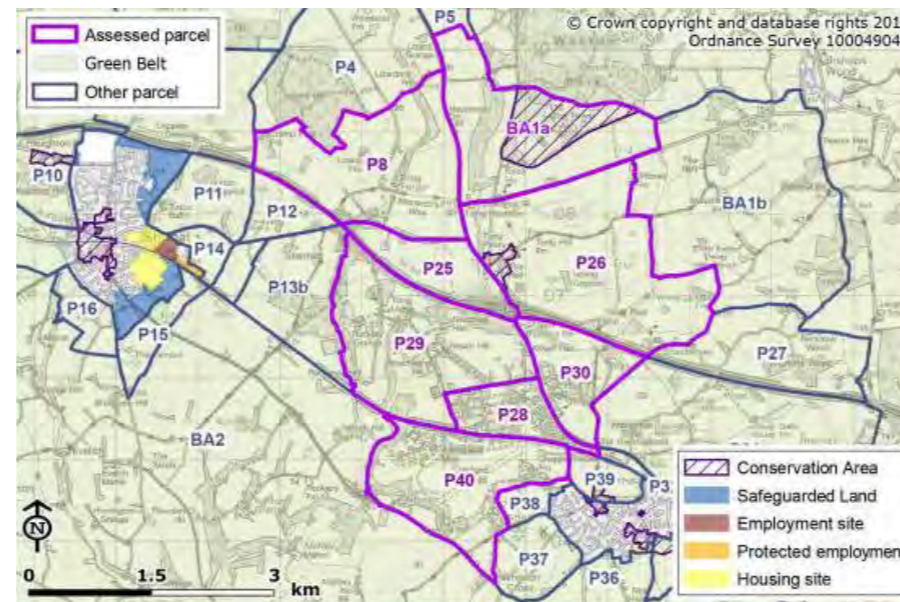
- 2.41 The Stage 2 Review also identifies potential beneficial uses of the Green Belt at Table 5.2. This is in recognition of the NPPF requiring development plans to set out ways of offsetting the impact of removing land from the Green Belt through compensatory improvements to environmental quality and accessibility of remaining Green Belt land (NPPF paragraph 138) and the requirement to plan positively to enhance the beneficial use of land in the Green Belt (NPPF paragraph 141).
- 2.42 Beneficial uses identified by the NPPF include providing opportunities for access, outdoor sport and recreation and to retain and enhance landscape, visual amenity or to improve damaged or derelict land. The measures set-out at Table 5.2 reflect these.
- 2.43 At paragraph 5.3, the Review recognises that such beneficial uses and enhancements can also include measures that may strengthen boundaries and buffers as well as the visual character of the land and therefore affect the contribution of land to the Green Belt purposes.

Stage 2 Green Belt Review: Junction 3 Assessment

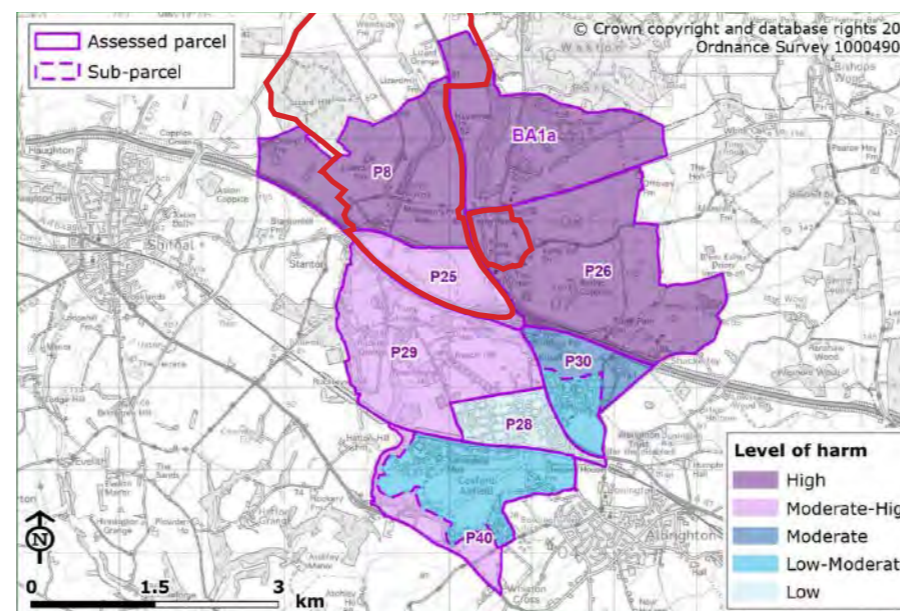
- 2.44 The Stage 2 Review includes an assessment of land at Junction 3 as a strategic location and part of the M54 / A5 strategic corridor "Growth Zone" identified by the Local Plan to form

part of the growth strategy for Shropshire. This assessment is contained at Appendix 5 of the Stage 2 Review.

- 2.45 The area assessed comprises a number of strategic land parcels, as defined and assessed by the 2017 Assessment. This includes Parcels P8, P25 and P26 within which the site is situated.
- 2.46 The parcels assessed are illustrated on the extract of Figure A5.2: 'Green Belt Parcels Surrounding Junction 3' below:



- 2.47 For reference, the extract of Figure A5.20: 'Individual Harm from Release of Parcels Surrounding Junction 3' included below has been overlaid with the site boundary and illustrates the extent of the site in relation to the parcels assessed:



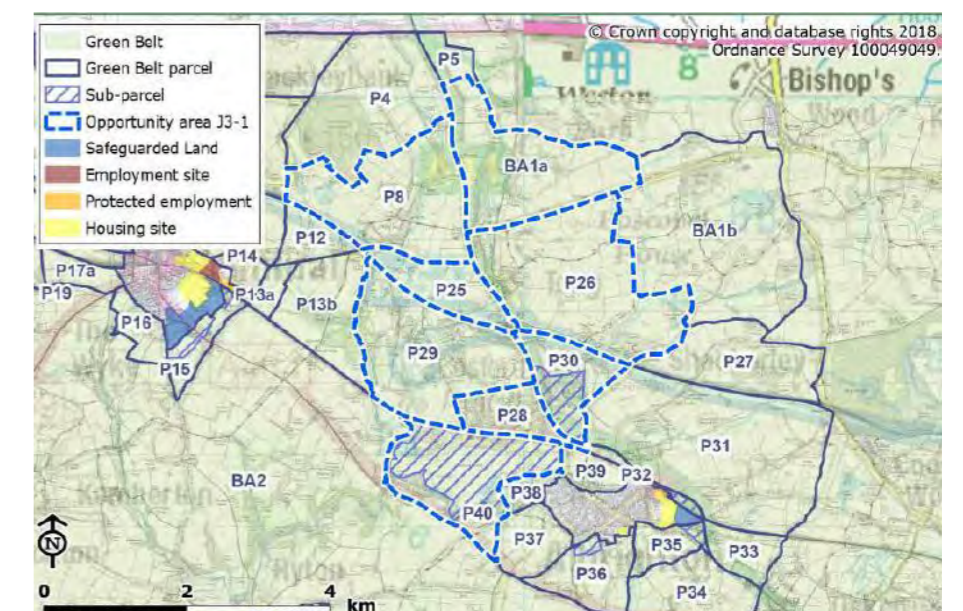
- 2.48 The Assessment's for each of the parcels covering the site at Junction 3 are appended in **Appendix 2** of this report.

Opportunity Areas - Assessment of Harm of Green Belt

- 2.49 The Stage 2 Review tests the harm to the Green Belt associated with the release of land at Opportunity Areas at Junction 3.

Opportunity Area J3-1

- 2.50 Opportunity Area J3-1 includes all of the parcels within the Junction 3 area, as illustrated on the extracted Figure A5.21: 'Opportunity Area J3-1' below.
- 2.51 The Assessment of Harm for this Area is identified as High for the following reasons:
- Development would be sited in a large area of open countryside to the north of the M54 which would constitute substantial encroachment on the open countryside;
 - Development would significantly weaken the role neighbouring areas of Green Belt land are playing with regard to Purpose 3; and
 - Release of the whole of Opportunity Area J3-1 would also lead to substantial narrowing of the settlement gap between Shifnal and Albrighton which would compromise the Green Belt with regard to Purpose 2.



2 Purpose and Methodology

Mitigation Measures

- 2.52 No mitigation measures have been identified, as the release of the area has been assessed as having a high level of harm on the Green Belt.
- 2.53 This does not allow for the consideration of how development may be incorporated into this area of land, or how the parcels assessed may be sub-divided and considered as to whether they may deliver areas suitable for release with defensible boundaries.
- 2.54 The assessment simply assumes that development may occur over the entire area. This is unrealistic and does not take into account constraints to development, how features could be incorporated into masterplans or opportunities for the enhancement of land retained in the Green Belt within these larger strategic parcels should sub-parcels be released for development.

Sub-Opportunity Area J3-1a and J3-1b

- 2.55 The Stage 2 Review identifies two sub-areas comprising Parcels P28, P30 and sub-parcel P40 to the south of the M54. These do not include the site area and comprise areas of land that are partially developed and which lies adjacent to existing development at Albrighton and Cosford airfield.

Conclusions for Junction 3

- 2.56 The Stage 2 Review assessment identifies that Opportunity Area J3-1a, which includes sub-parcels to the south of the M54, could be released with Moderate levels of harm to the Green Belt.
- 2.57 Opportunity Area J3-1b is identified as being possible for release with Low-Moderate levels of Harm to the Green Belt.
- 2.58 Having assessed the level of harm of the larger strategic parcels and sub-areas at Junction 3, the Stage 2 Review concludes that the release of Opportunity Area J3-1, representing all of the parcels within the Junction 3 area would result in a High level of harm to the Green Belt and:

“... have a significant impact on the West Midlands Green Belt through the development of a large area of land along the M54 corridor between Wolverhampton, Albrighton, Shifnal and Telford and the narrowing of the gaps between these settlements”

Summary

- 2.59 As set out above, the Stage 2 Review has identified the wider Opportunity Area at Junction 3, including the site area, as resulting in a High level of harm to the Green Belt should it be released for development.
- 2.60 The Stage 2 Review did not assess the land to the north of the M54 as a separate sub-area, despite considering land to the south as potential Sub-Opportunity Areas using smaller land parcels.
- 2.61 The findings for the Junction 3 Opportunity Area and land to the north of the M54 relate primarily to the assessment of large land parcels that were identified in the 2017 Green Belt Assessment. These were assessed as being open, largely undeveloped and of a countryside character, thereby making a high contribution to Green Belt purpose 3.
- 2.62 Furthermore, these larger parcels were also assessed as having relatively weak boundaries with the wider Green Belt, with a resulting high impact upon the contribution of these other areas to Purpose 3. This has led to the area being discounted as suitable for release, with no mitigation measures having been identified.
- 2.63 Furthermore, the Stage 2 Review did not sub-divide the larger parcels (P8 and P26) and identify whether there are any smaller, distinct parcels north of the M54 that could be assessed on their own merits. Neither was Parcel P25 highlighted as making a lower contribution and potentially lower harm associated with development due to containment and influence of the M54. This is despite the assessment recognising both the lower contribution to the Green Belt purposes and level of harm associated with release and development of the parcel.
- 2.64 Whilst the methodology employed by the Stage 2 Review is generally sound for a strategic study, the findings of the assessment for the site as part of the Junction 3 Opportunity Area highlight its limitations.
- 2.65 Whilst it is acknowledged that the Review has been undertaken at a strategic scale and without knowledge of specific development proposals, the assumption that whole areas will be lost to development results in areas being discounted without full and robust consideration or without no mitigation measures being identified.



Tyler Grange Methodology - Site-Specific Green Belt Review

- 2.66 In order to address the issues identified above, this assessment provides the opportunity for an assessment to be made of individual sites and masterplans as opposed to large, strategic land parcels.
- 2.67 Plan 3: Assessment Parcels**, illustrates how the site has been divided into individual parcels that are distinct from one another and are divided or edged by recognisable features such as roads, watercourses, hedgerows and woodland.
- 2.68 This enables the Green Belt Review to take the next step allowing for a more detailed and informed analysis of the landscape and visual opportunities and constraints to development for the land at Junction 3.
- 2.69 Each parcel's individual assessment is further supported by plans and photographs to demonstrate boundaries, intervisibility, landform and features.
- 2.70 This assessment therefore establishes how development may be delivered on land released from the Green Belt that limits harm to the wider Green Belt, provides robust and permanent boundaries and offers opportunities for the enhancement of land retained in the Green Belt for access, recreation and landscape & biodiversity.
- 2.71 The site-specific methodology and process employed for each of the parcel's assessment is set out as follows:
- Description and illustrations of the parcel's relationship to settlement and countryside
 - Contribution of the parcel to the Green Belt purposes against the council's methodology
 - Parcel's boundaries are defined
 - Harm to Green Belt resulting from parcel's release, utilising the council's stage 2 Green Belt Review methodology
 - Aided by a parcel specific plan, potential mitigation and boundary enhancements are set out, using the council's outlined mitigation measures
- 2.72 Following from the parcel specific assessment's, a combined Opportunities and Constraints Plan has been created to inform the future materplanning for the Land at J3.

3 Tyler Grange Green Belt Review

Plan 3: Assessment Parcels_11298_P04



-  Parcel Boundary
-  Parcel Assessment Number

Project 12298_Land at J3
Drawing Title Combined Opportunities and Constraints Plan
Scale Not to Scale
Drawing No. 12298 P04
Date August 2019
Checked EF/RH

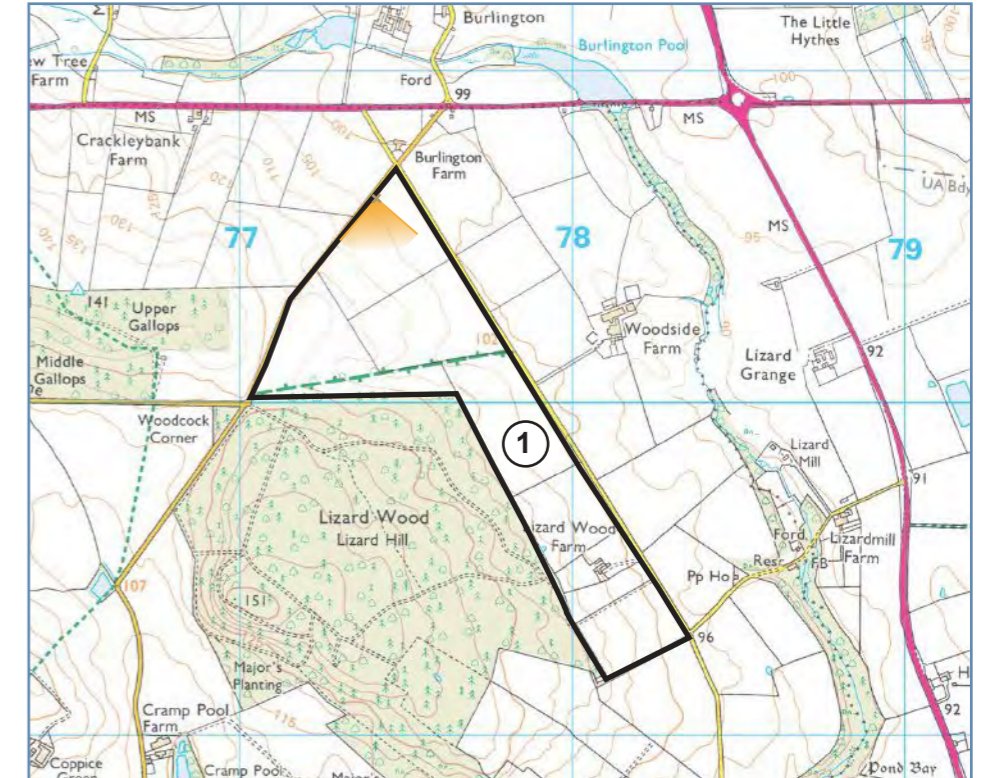


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Parcel 1



Image P1a: The parcel is overlooked by Lizard Wood to the west / south west.



Relationship to Settlement / Countryside

- 3.1 Parcel 1 comprises gently sloping agricultural land which sits between Lizard Wood to the west and Lizard Lane to the east. The parcels internal fields are separated by linear strips of hedge planting and hedgerow trees. Other than the farmstead of Lizard Wood Farm, there are no urbanising developments present within the parcel.
- 3.2 The parcel is contained to the east by Lizard Lane and its associated boundary planting. To the south, the parcel's boundary is defined by a distinguishable strip of Scotts Pine trees, whilst to the west the parcel is edged and overlooked by Lizard Wood which sits on higher ground and forms a prominent wooded backdrop. The north western boundary of the parcel runs parallel to an 'unnamed road' connecting Lizard Lane to Nanny Murphy's Lane and Coppice Green Lane.
- 3.3 Parcel 1 is contained within 'P4' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 4. The conclusions on the contribution of Parcel 1 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 3.5 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Strong

- 3.6 The parcel consists of open agricultural fields used for arable farming which reflect the rural character of the wider area, whilst Lizard Wood also stands as an influential landscape feature overlooking the parcel to the west. There are no urbanising features present within the parcel other than Lizard Wood Farm which is congruous with the rural character. In this regard the parcel can be considered as spatially open, and plays a role in

safeguarding the countryside from encroachment.

- 3.7 The rising topography of the parcel to the west towards Lizard Wood means the parcel is also visually open and susceptible to views from the wider area.

Purpose 4

No Contribution

- 3.8 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 3.9 All parcels make an equally significant contribution to this purpose.

Parcel 1



Image P1b: Parcel 1 is visually susceptible to views from the east due to the rising topography of its comprising fields.

Boundaries

- 3.10 The parcel does not lie adjacent to an existing inset area. Any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 3.11 The parcel is contained to the east by Lizard Lane alongside the hedgerow and hedge tree planting which follows the lineage of the road. Although the council's assessment does not constitute this road as a 'Strong' boundary, it is robust and readily recognisable.
- 3.12 The parcel's southern boundary comprises a recognisable strip of Scotts Pine trees.
- 3.13 To the west, the parcel is contained by Lizard Wood which serves as a robust and permanent boundary.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 3.14 The parcel makes a strong contribution to purpose 3 comprising uninterrupted agricultural land which displays characteristics of the countryside and is overlooked by Lizard Wood, which further adds to the rural character. Furthermore, the parcel is visually sensitive to views from the wider area due to its rising topography. Releasing the parcel from the Green Belt would therefore lead to

both a spatial and visual encroachment of the countryside.

- 3.15 Other than purpose 3, the parcel does not contribute to any more of the Green purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 3.16 As a result of the rising topography to the west, the parcels release from the Green Belt would have an adverse effect on the integrity of the wider Green Belt and surrounding landscape.
- 3.17 When viewed from the east, the open agricultural fields are largely visible and form part of the character created by Lizard Wood and Dog Wood (as illustrated above in **Image P1b**). Development of the parcel would therefore have direct implications on the perceived openness of the parcel and would detract from the wooded setting created by Lizard Wood and Dog Wood.

Strength of parcel boundaries

- 3.18 Lizard Wood to the west of Parcel 1 is a readily recognisable and permanent boundary. The parcels eastern and north western boundaries are defined by Lizard Lane and an unnamed road, which although do not constitute strong Green Belt boundaries, are recognisable and likely permanent. The strip of Scotts Pine trees which runs along the parcels southern boundary is not

strong.

Potential harm to the Green Belt

- 3.19 Considering the above factors and their combined relationship, judgement has been made 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 1

Potential Mitigation and Boundary Enhancements

3.20 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 1 Mitigation and Enhancement Plan.

Preserve/enhance landscape elements which contribute to the setting of Historic settlements

1. Although not within Parcel 1, there is a Scheduled Ancient Monument (SAM) to the north east which sits within Parcel 2. Given the parcels sensitivity to Green Belt release, there are opportunities to incorporate the land to the north of the parcel with the open space enhancements recommended for Parcel 2.

Strengthen boundary at weak points and use landscaping to help integrate new Green Belt boundary

2. Hedgerows and hedgerow trees along Lizard Lane that define the parcels eastern boundary should be retained and enhanced, with any weak points strengthened to minimise the impact of development on the wider Green Belt.

Define Green Belt edge using a strong, natural element which forms a visual barrier

3. The parcel is contained to the west by Lizard Wood. This boundary serves as a robust, natural feature within the landscape and forms visual barrier that prevents intervisibility between the parcel and the surrounding countryside to the west. As such, this belt of woodland planting could be used to define the parcels western edge, and where possible be retained and enhanced.

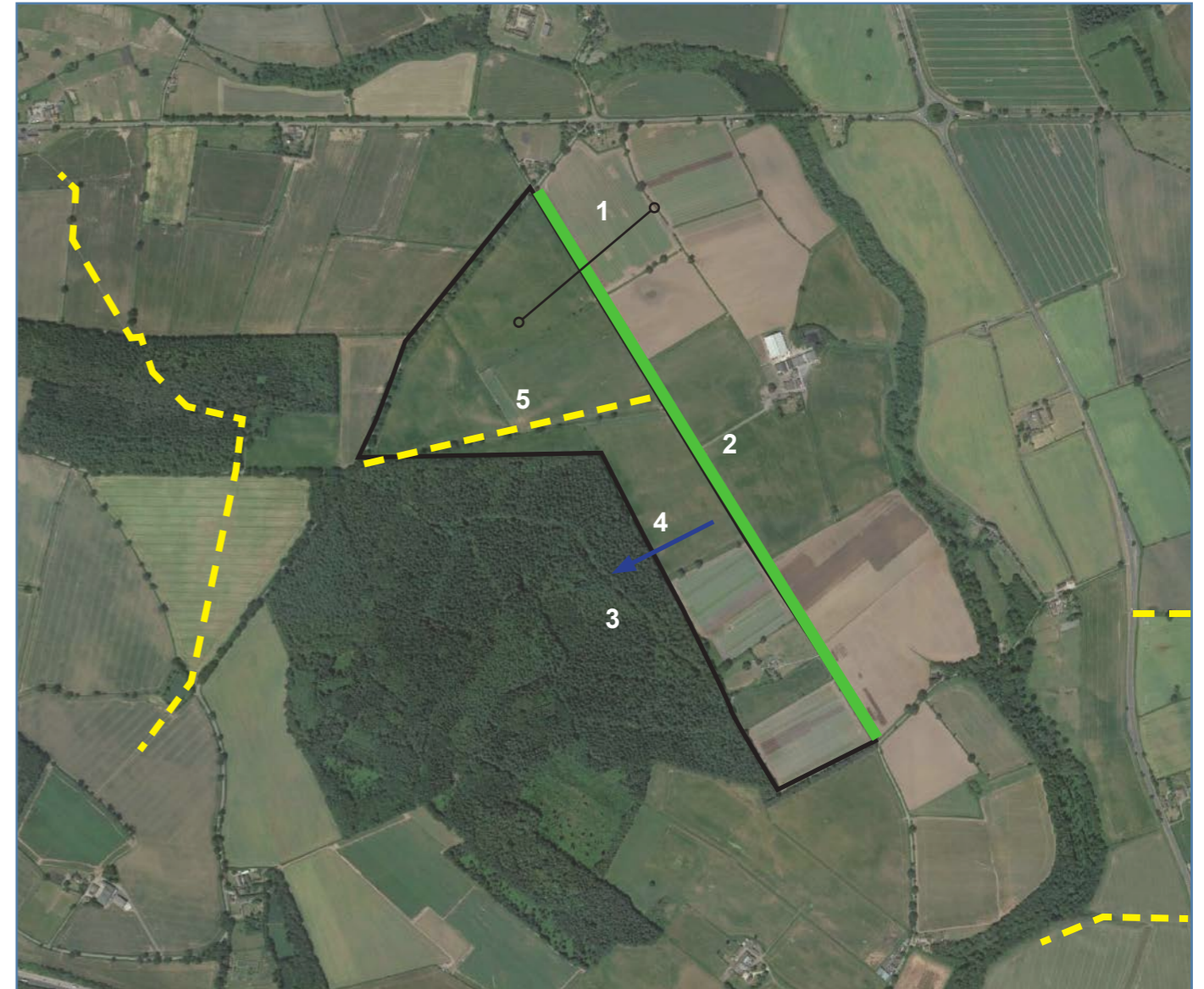
Enhance visual openness within the Green Belt

4. Given the parcel's topographical sensitivity and it's relationship with the wider Green Belt, it is recommended that land within the parcel is retained as open space. Namely, there are opportunities to retain the parcel's visual relationship with Lizard Wood to the west which sits on higher ground forming a wooded backdrop. This would increase the extent to which the parcel is perceived as relating to the wider countryside.

Enhance access within the Green Belt

5. Public footpath ref 0141/17/1 traverses the north of the parcel and connects to areas with features and characteristics, such as Lizard Wood and Dog Wood to the west and Weston Park to the east. There are opportunities to integrate new footpaths within development to connect with the existing PRoW network and therefore improve access to the surrounding Green Belt and countryside.

Parcel 1 Mitigation and Enhancement Plan



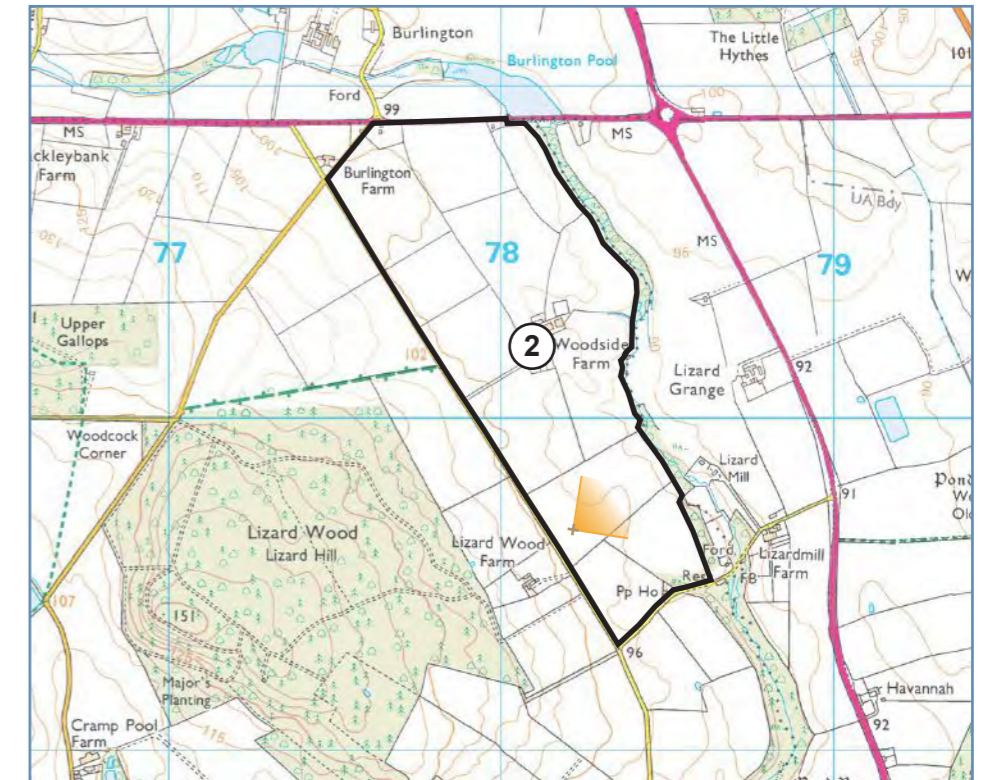
Summary

- Parcel 1 comprises gently sloping agricultural land which sits between Lizard Wood to the west and Lizard Lane to the east.
- The parcel makes a **Strong** contribution to Green Belt purpose 3.
- It has been assessed that the parcels release from the Green Belt would lead to a **High** level of harm due to a combination of factors, including: the parcel's topographical sensitivity; its intrinsic relationship with Lizard Wood; and, it's visual and spatial openness.
- Given the parcel's 'High' harm to Green Belt release, it is recommended that the parcel either remains within the Green Belt, or, if it was to be released from the Green Belt any development proposals should seek to retain and enhance the land as open space, as outlined above.

Parcel 2



Image P2a: Parcel 2 comprises open agricultural fields and is contained to the east by a dense belt of vegetation.



Relationship to Settlement / Countryside

- 5.1 Parcel 2 consists of gently sloping agricultural land which is divided into several arable fields that are separated by mature hedgerows and tree planting. The parcel contains no urbanising development, although the properties and units associated with Woodside Farm are prominent features within the landscape (see Image P1b).
- 5.2 The parcel is bound to the north by the A5 and hedgerow planting that runs parallel to the road. To the east, the parcel is contained by a substantial belt of tree planting associated with the course of the River Worfe which separate the parcel from the wider countryside to the east. To the south, the parcel is bound by an access road leading up to Lizard Mill Farm. To the west the parcel is edged by Lizard Lane.
- 5.3 Parcel 2 is contained within 'P4' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 4. The conclusions on the contribution of Parcel 2 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 5.5 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Strong

- 5.6 The parcel comprises agricultural fields and wooded backdrop. This creates a rural character in the landscape which is uninterrupted by any urbanising development. Therefore, the parcel is spatially open and plays a role in safeguarding the countryside from encroachment.
- 5.7 The parcel is contained by a set of robust boundaries which serve

to limit intervisibility between the parcel and the surrounding countryside / wider Green Belt to the north and east.

Purpose 4

No Contribution

- 5.8 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 5.9 All parcels make an equally significant contribution to this purpose.

Parcel 2



Image P2b: The parcel comprises gently sloping agricultural land and contains Woodside Farm which forms a prominent feature in the landscape.

Boundaries

- 5.10 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt
- 5.11 The parcel is bounded to the north by the A5 and to the east by the River Worfe and its associated woodland planting, both of which could constitute strong Green Belt boundaries.
- 5.12 The parcel is contained to the west by Lizard Lane. Whilst the councils assessment does not define this road as a 'Strong' boundary, it is robust and readily recognisable.
- 5.13 Each of the parcel's boundaries are lined by robust belts of planting which serve to contain the parcel from the surrounding landscape.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 5.14 The parcel makes a strong contribution to purpose 3 comprising uninterrupted agricultural land which displays characteristics of the countryside. Releasing the parcel from the Green Belt would therefore lead to encroachment of the countryside.

- 5.15 Other than purpose 3, the parcel does not contribute to any more of the Green purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 5.16 The release of the parcel from the Green Belt would not have an adverse impact on the integrity of the neighbouring Green Belt land due to its containment from the wider landscape. The parcel sits within a well screened enclosure whereby the woodland associated with the River Worfe, boundary planting adjacent to the A5 and Lizard Lane, and internal field boundaries serve to limit intervisibility between the parcel and the surrounding Green Belt land. The effects of development would therefore be largely localised to within the parcel's boundaries.

Strength of parcel boundaries

- 5.17 The parcel is contained to the north by the A5 which is a readily recognisable and permanent boundary. To the east the parcel is bounded by a belt of tree planting which contains the River Worfe within it. As aerial photography shows, this boundary is highly robust and readily recognisable. The parcels western boundary follows Lizard Lane and its adjacent hedgerow and hedgerow tree planting which is also recognisable and likely permanent.

Potential harm to the Green Belt

- 5.18 Considering the above factors and their combined relationship, judgement has been made 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 2

Potential Mitigation and Boundary Enhancements

5.19 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 2 Mitigation and Enhancement Plan.

Preserve/enhance landscape elements which contribute to the setting of Historic settlements

1. There is a Scheduled Ancient Monument contained within the parcel to the north. Subsequent to Green Belt release, there are opportunities to incorporate the land around the SAM as open space, offering opportunities for education and appreciation of the historic context. This area could also tie-in with other areas of Green Infrastructure and open space including the tree'd watercourse that runs through the site and the adjoining area of land contained within Parcel 1.

Define Green Belt edge using a strong, natural element which forms a visual barrier

2. The parcels eastern boundary comprises the River Worfe alongside the belt of woodland planting which encloses it. This boundary serves as a robust, natural feature within the landscape and forms a visual barrier that prevents intervisibility between the parcel and the surrounding countryside. This belt of woodland planting could be used to define the parcels eastern edge, and where possible be enhanced.

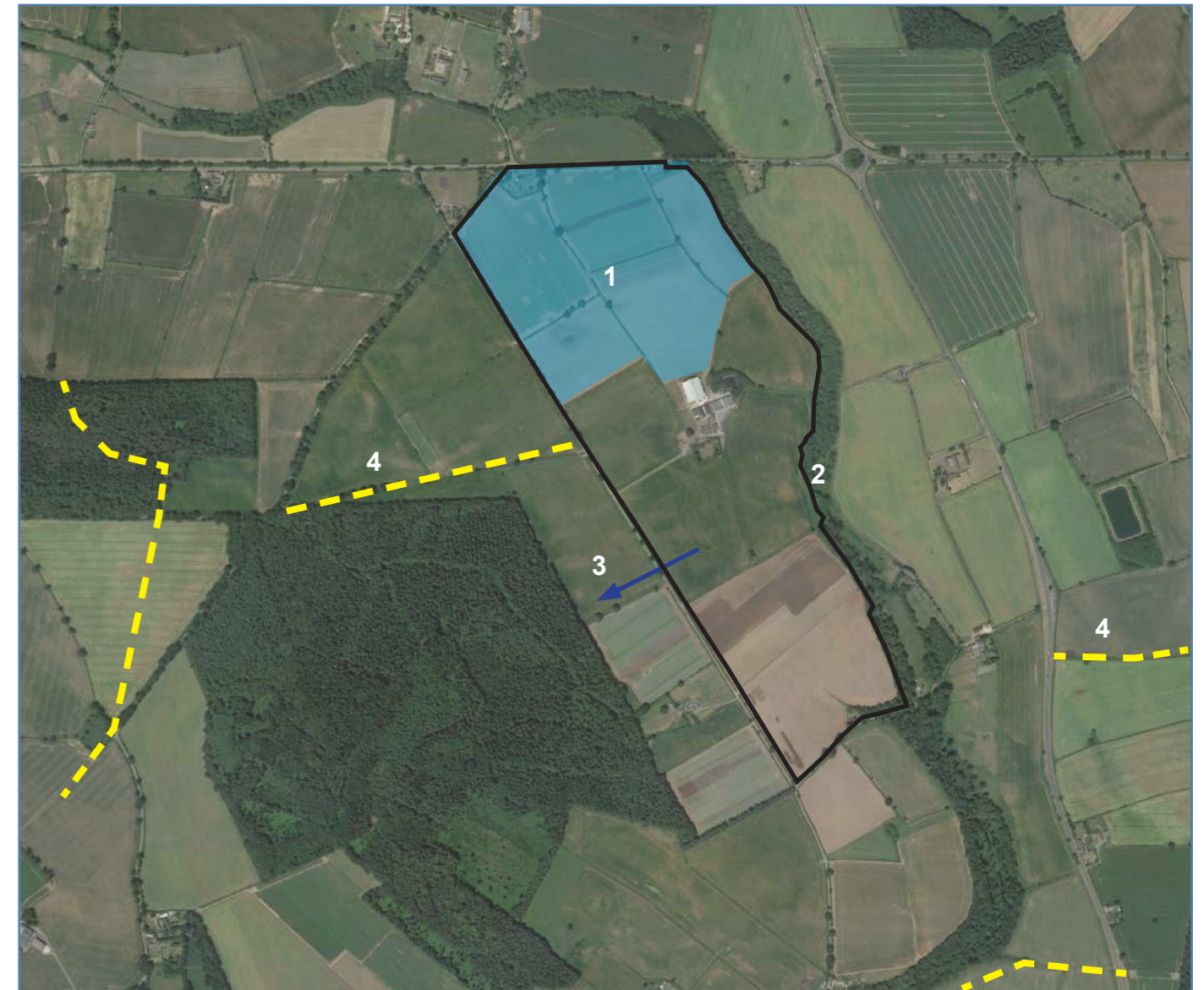
Enhance visual openness within the Green Belt

3. There are opportunities to retain the parcel's visual relationship with Lizard Wood to the west which sits on higher ground forming a wooded backdrop. This would increase the extent to which the parcel is perceived as relating to the wider countryside

Enhance access within the Green Belt

4. There are a number of public footpaths around the parcel which connect to areas with valued characteristics, such as Lizard Wood and Dog Wood to the west and Weston Park to the east. There are opportunities to integrate new footpaths within development to connect with the existing PRoW network and therefore improve access to the surround Green Belt and countryside

Parcel 2 Mitigation and Enhancement Plan



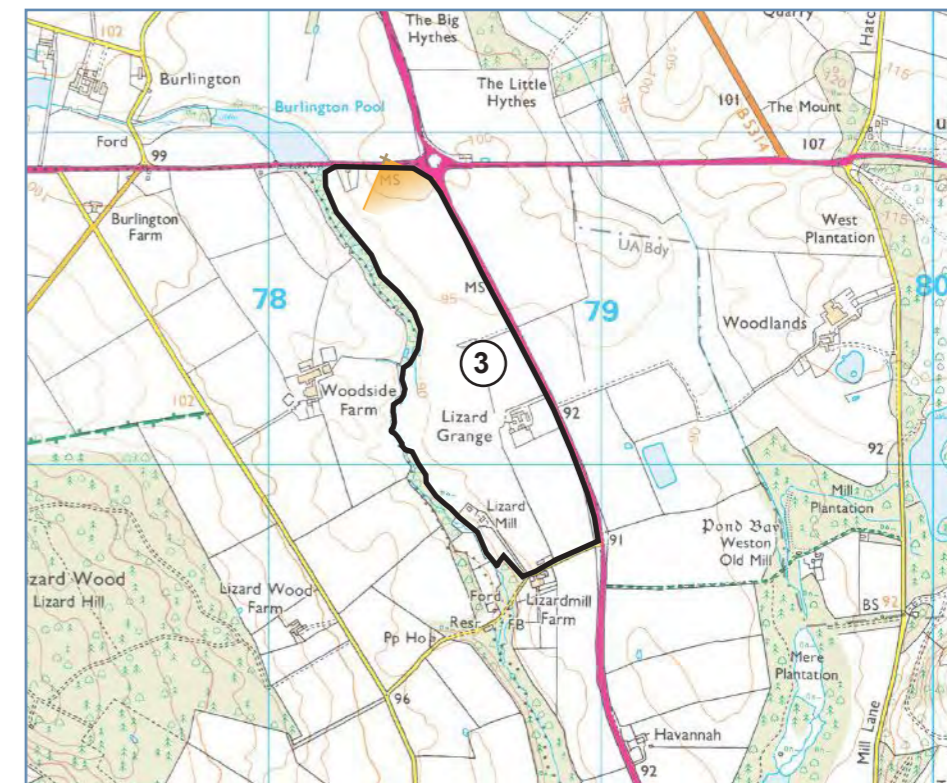
Summary

- Parcel 2 consists of gently sloping agricultural land which sits between Lizard wood to the west and the belt of woodland planting that follows the River Worfe to the east. The A5 contains the parcel to the north.
- The parcel makes a **Strong** contribution to Green Belt purpose 3.
- It has been assessed that the release of the parcel from the Green Belt would lead to a **Moderate** level of harm. Whilst there would be an adverse effect on the spatial openness of the parcel subsequent to development, the effects would be localised due to the parcels visual containment from the wider Green Belt. The A5 and woodland to the east also are strong boundaries which are both physically and visually robust.
- In the circumstance of Green Belt release, there are opportunities to retain and enhance the parcel's sense of enclosure to ensure the effects of development are localised. Any proposals should also seek to respectfully incorporate the SAM to the north of the parcel.

Parcel 3



Image P3a: Newport Road / A451 to the east has an urbanising influence on the parcel.



Relationship to Settlement / Countryside

- 6.1 Parcel 3 consists of large, flat arable fields. The land slopes up slightly to the north (illustrated above in **Image P3a**). The parcel is bound to the north by the A5 and to the east by Newport Road/A41. The parcel's southern boundary comprises a hard-standing track leading to Lizard Grange. To the west, the parcel is contained by the River Worfe and associated woodland planting. There are open views afforded across the parcel from the A41, however the belt of woodland to the west prevents intervisibility between the parcel and the wider countryside to the west.
- 6.2 Within the site's boundaries there is no urbanising development, although Lizard Grange is a distinct feature in the parcel.
- 6.3 Parcel 3 is contained within 'P4' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 4. The conclusions on the contribution of Parcel 2 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 6.5 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Moderate

- 6.6 The parcels large agricultural fields provide a rural character which is further enhanced by it's wooded backdrop. There is also no urbanising development within the parcel's boundaries. In this regard the parcel can be considered as spatially open to which it plays a role in safeguarding the countryside from encroachment.
- 6.7 The parcel however is influenced the A5 and A41, both of which carry large volumes of traffic. These features detract from the

overall rurality of the parcel and disrupt the visual openness.

- 6.8 Although the parcel is largely open to views from along the A41, intervisibility between the parcel and the surrounding countryside / wider Green Belt is limited due to the boundaries to the north and west. The woodland which follows the course of the River Worfe in particular acts as a strong visual barrier which prevents views from along the A41 extending to Lizard Wood to the west.

Purpose 4

No Contribution

- 6.9 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 6.10 All parcels make an equally significant contribution to this purpose.

Parcel 3



Image P3b: Parcel 3 is open to views from the east along the A41, although the belt of woodland planting to the west prevents views reaching the surrounding Green Belt land further west.

Boundaries

- 6.11 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 6.12 The parcel is contained by a set of robust boundaries. To the north, the A5 would constitute a strong Green Belt boundary as it is instantly recognisable and permanent. Similarly, to the east the A451 acts as a strong boundary.
- 6.13 The belt of woodland planting associated with the River Worfe edges the parcel to the west is clearly defined and would serve as a strong new Green Belt boundary.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 6.14 The parcel makes a moderate contribution to purpose 3 as it consists of uninterrupted agricultural land, which if released from the Green Belt and developed would result in encroachment of the countryside. However the rurality of the parcel is heavily detracted by the influence of the A5 and Newport Road and large volumes of traffic.
- 6.15 Other than purpose 3, the parcel does not contribute to any of the Green Belt purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 6.16 The parcels location adjacent to two busy A roads, combined with it's enclosure from the wider landscape, means that its release from the Green Belt would not have a directly adverse impact on the integrity of the neighbouring Green Belt. The parcel is heavily influenced by the A roads and associated large volumes of traffic which influence the countryside character. The effects of development would also be largely localised to within the parcels boundaries as intervisibility between the parcel and the adjacent Green Belt land, particularly to the west, is obstructed by the parcels boundaries.

Strength of parcel boundaries

- 6.17 Asides from the track leading to Lizard Grange to the south, the parcel's boundaries are all considered to be strong as they are instantly recognisable and permanent.

Potential harm to the Green Belt

- 6.18 Considering the above factors and their combined relationship, judgement has been made 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 3

Potential Mitigation and Boundary Enhancements

6.19 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 3 Mitigation and Enhancement Plan.

Strengthen boundary at weak points and use landscaping to help integrate new Green Belt boundary

1. The parcel's eastern boundary adjacent to the A41 / Newport Road offers little visual containment. There are opportunities to strengthen the physical and visual robustness of this boundary with additional tree and hedge planting which is typical of boundary planting in the area, as recognised by the **Shropshire Landscape Character Assessment**. This would also help integrate any development within parcel with the surrounding landscape.

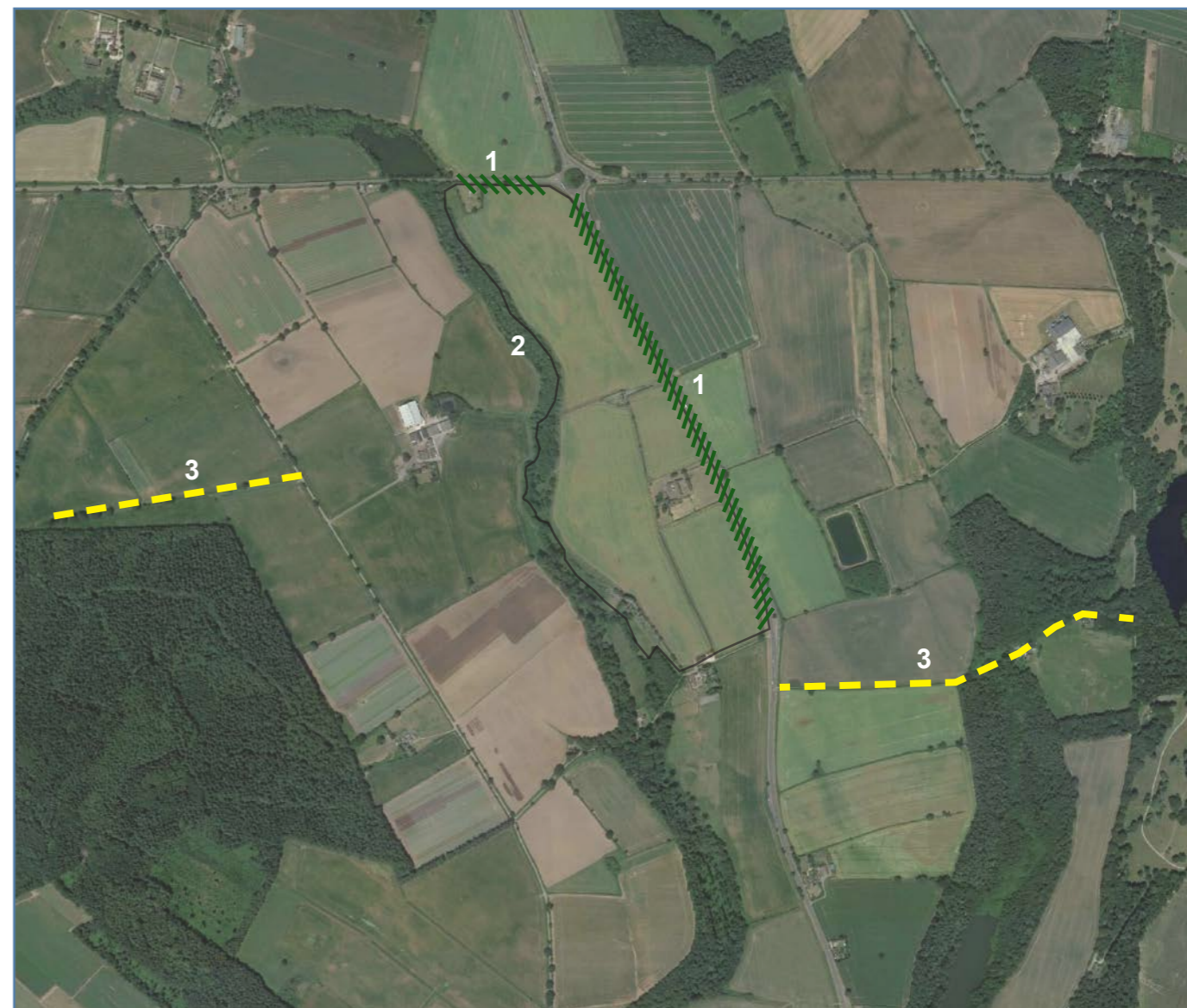
Define Green Belt edge using a strong, natural element which forms a visual barrier

2. The parcels western boundary comprises the River Worfe alongside the belt of woodland planting which encloses it. This boundary serves as a robust, natural feature within the landscape and forms visual barrier that prevents intervisibility between the parcel and the surrounding countryside. As such, this belt of woodland planting could be used to define the parcels western edge, and where possible be retained and enhanced.

Enhance access within the Green Belt

3. There are a number of public footpaths around the parcel connected to Lizard Wood and Dog Wood to the west and Weston Park to the east. There are opportunities to integrate new footpaths within development to connect with the existing PRoW network and therefore improve access to the surround Green Belt and countryside.

Parcel 3 Mitigation and Enhancement Plan



Summary

- Parcel 3 consists of large arable fields which sit between the A41 to the east and the belt of woodland planting associated with the River Worfe to the west. The A5 contains the parcel to the north.
- The parcel makes a **Moderate** contribution to Green Belt purpose 3. Newport Road adjacent to the parcel leads to a level of encroachment.
- It has been assessed that the parcels release from the Green Belt would lead to a **Moderate** level of harm. Whilst there would be an effect on the spatial openness of the parcel subsequent to development, the effects would be localised due to the parcels visual containment from the wider Green Belt. The A5, A41 and woodland to the west also are strong boundaries which are both physically and visually robust.
- Subsequent to the parcel's Green Belt release, there are opportunities to integrate the parcel within the wider landscape and soften the perceived development edge by retaining and enhancing the eastern boundary adjacent to the A41.

Parcel 4

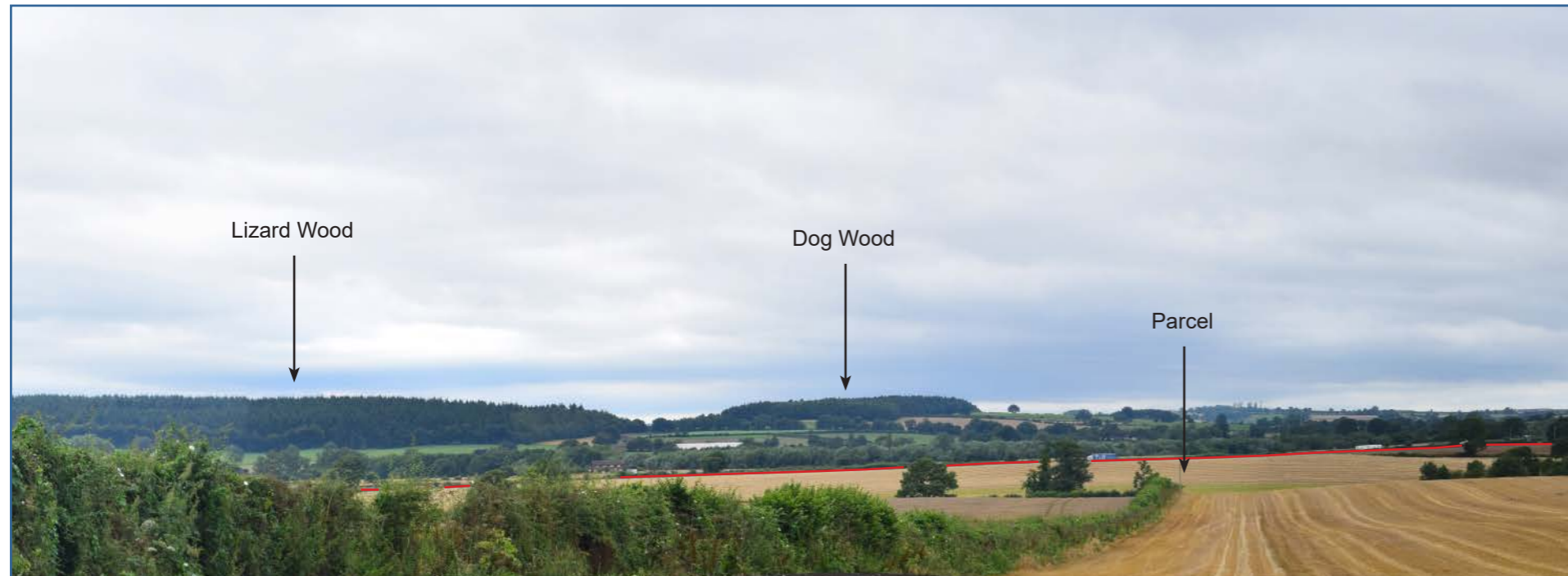
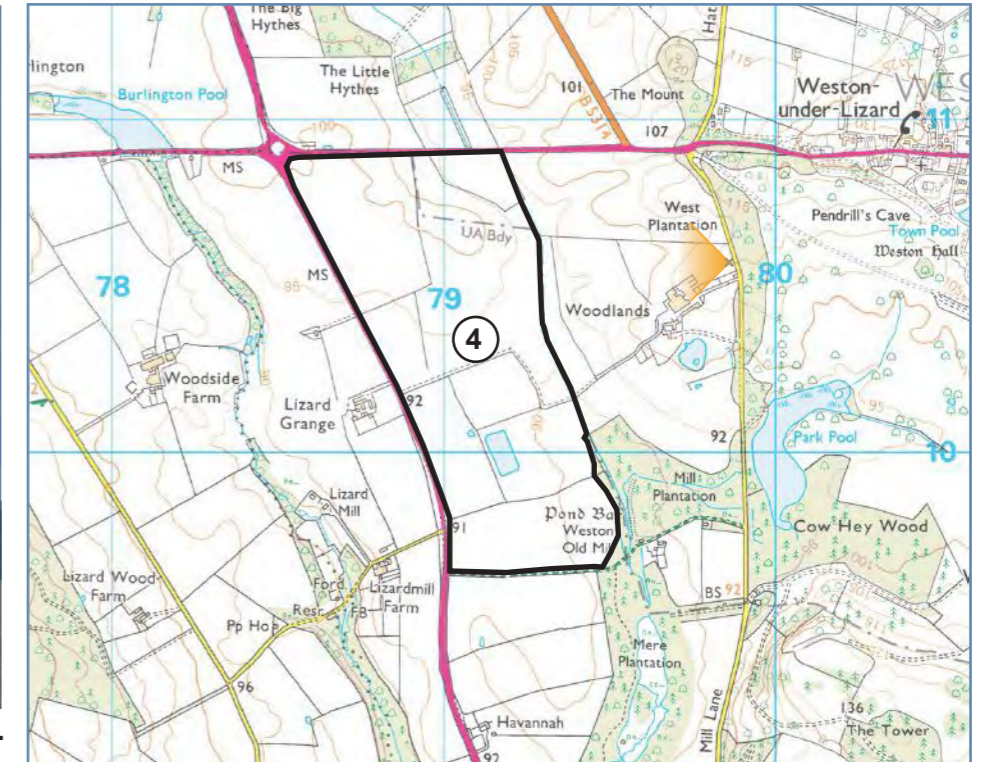


Image P4a: There is a high degree of intervisibility between the parcel and the surrounding countryside due to the undulating topography.



Relationship to Settlement / Countryside

- 7.1 Parcel 4 comprises open arable farmland which is uninterrupted by any form of urban development. The parcel is defined by the A5 to north and A41 to the west. The parcel's southern boundary follows a field boundary which is defined by strip of hedgerow and hedge tree planting, whilst the parcel's eastern boundary also consists of a field boundary. The parcel has a strong relationship with the adjoining countryside to the east which gently rises north easterly towards Western Park.
- 7.2 The southern half of Parcel 4 is contained within 'BA1' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 4. The northern half of Parcel 4 is contained within 'P5' of the assessment, in which it was assessed to make a Strong contribution to Purpose 3. The conclusions on the contribution of Parcel 2 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 7.4 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Strong

- 7.5 The parcel's open fields display a rural characteristics which are enhanced by the undulating backdrop leading up to Weston Park to the east and Lizard Wood to the west. There is also no urbanising development within the parcel's boundaries. In this regard the parcel can be considered as spatially open to which it plays a role in safeguarding the countryside from encroachment.

- 7.6 Intervisibility between the parcel and the rural Green Belt land to the east is uninterrupted. The scale of the fields, especially to the north of the parcel, alongside a lack of visually defensible field boundaries also means that the parcel is visually open (as illustrated in Image P4a)

Purpose 4

No Contribution

- 7.7 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 7.8 All parcels make an equally significant contribution to this purpose.

Parcel 4

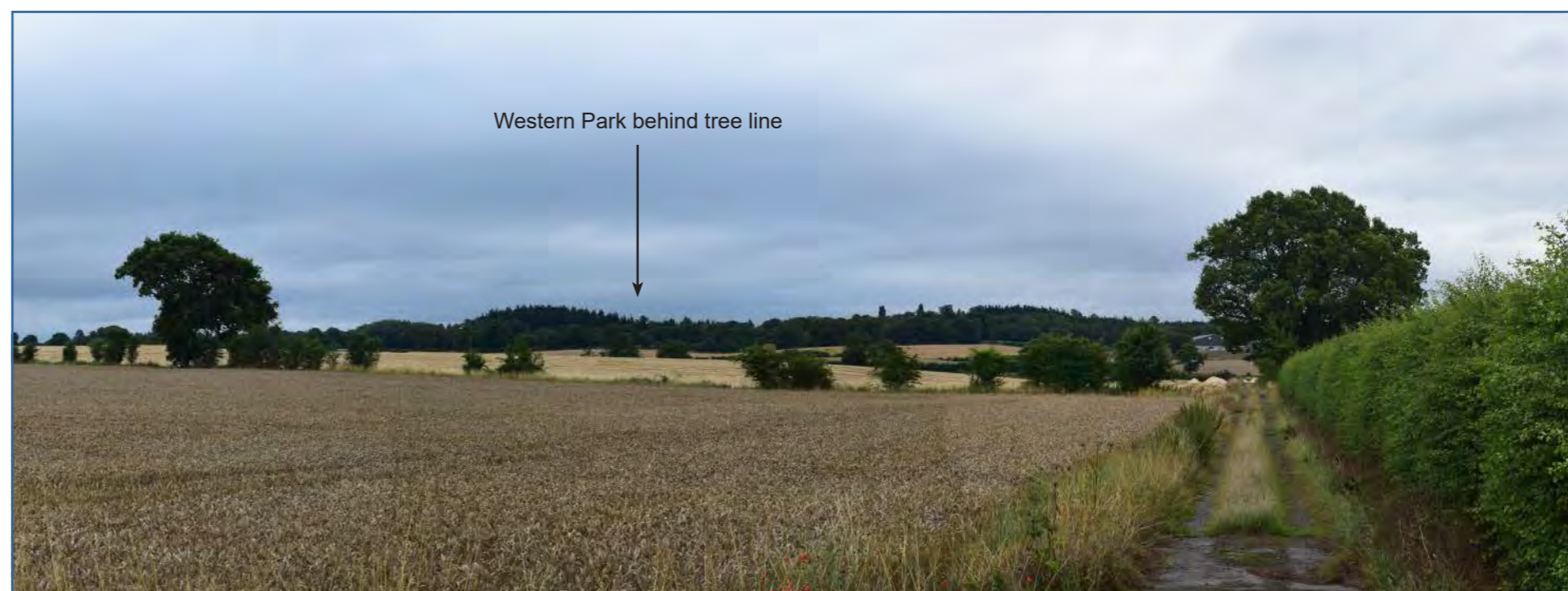


Image P4b: The parcel's eastern boundary is not physically nor visually defensible, rendering open views up to Western Park.

Boundaries

- 7.9 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 7.10 To the north and west the parcel is edged by the A5 and A41 which could constitute strong Green Belt boundaries as they are readily recognisable and permanent.
- 7.11 To the east and south however, the parcel is contained by a combination of field boundaries which are considered to be potentially weak Green Belt boundaries.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 7.12 The parcel makes a strong contribution to purpose 3 as it consists of uninterrupted agricultural land, which if released from the Green Belt and developed would result in encroachment of the countryside. Furthermore, the parcel is visually open with intervisibility between it and the surrounding countryside to the east and west.
- 7.13 Other than purpose 3, the parcel does not contribute to any more of the Green purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 7.14 Development of the parcel and its subsequent release from the Green Belt would adversely affect the integrity of the wider Green Belt. Namely, as illustrated in **Image P2a**, the parcel's development would compromise the rural character and openness of the surrounding Green Belt to the east and west.

Strength of parcel boundaries

- 7.15 Even though the parcel is contained by a set of strong boundaries to the north and west, the eastern and southern boundaries are weak, consisting of field boundaries which are neither physically nor visually robust.

Potential harm to the Green Belt

- 7.16 Considering the above factors and their combined relationship, judgement has been made 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 4

Potential Mitigation and Boundary Enhancements

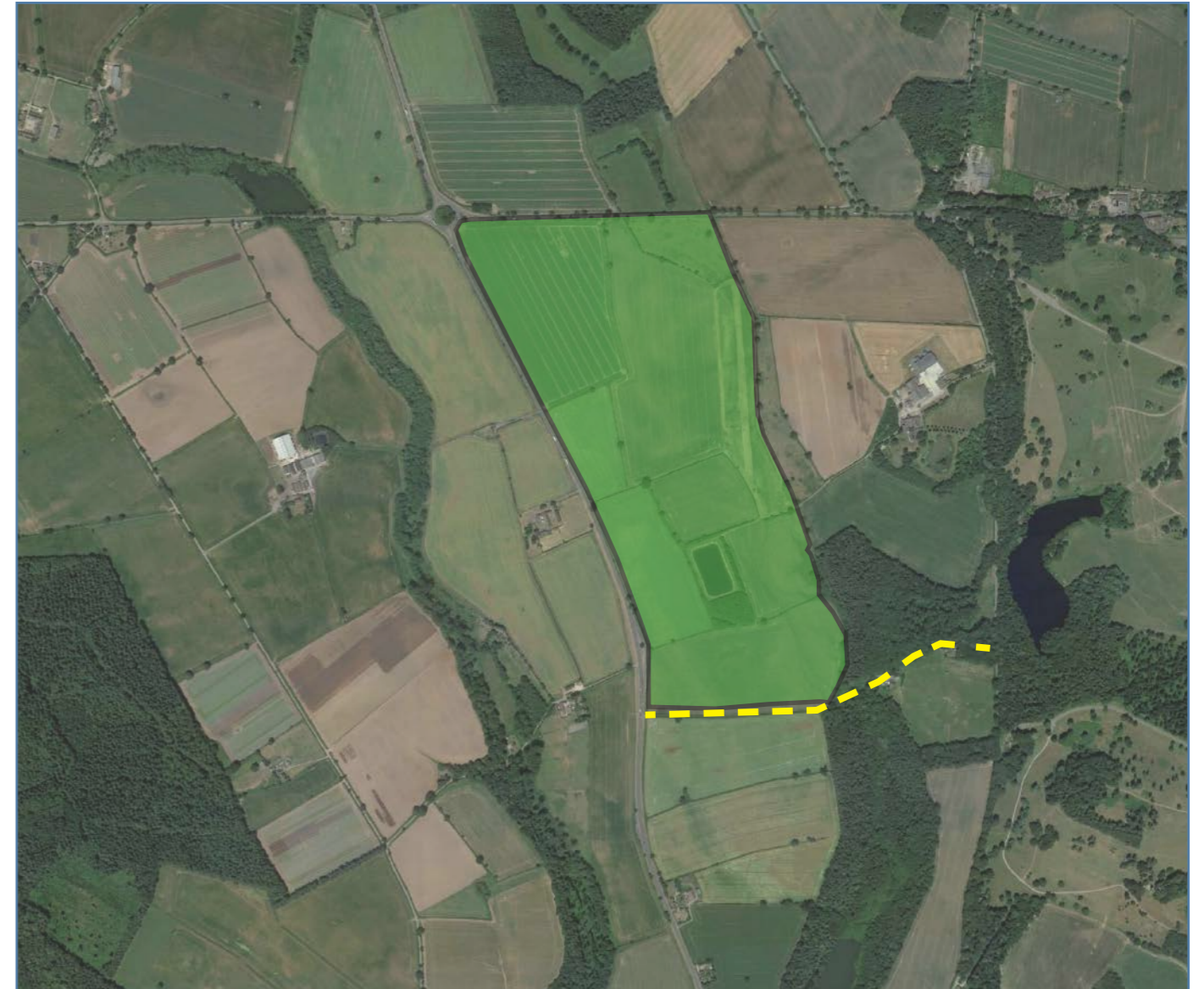
7.17 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 4 Mitigation and Enhancement Plan.

7.18 Given the sensitivity of Parcel 4, it is recommended that it remains in the Green Belt for compensatory improvement. The NPPG on Green Belts sets out:

“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. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- *new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.”*

Parcel 4 Mitigation and Enhancement Plan



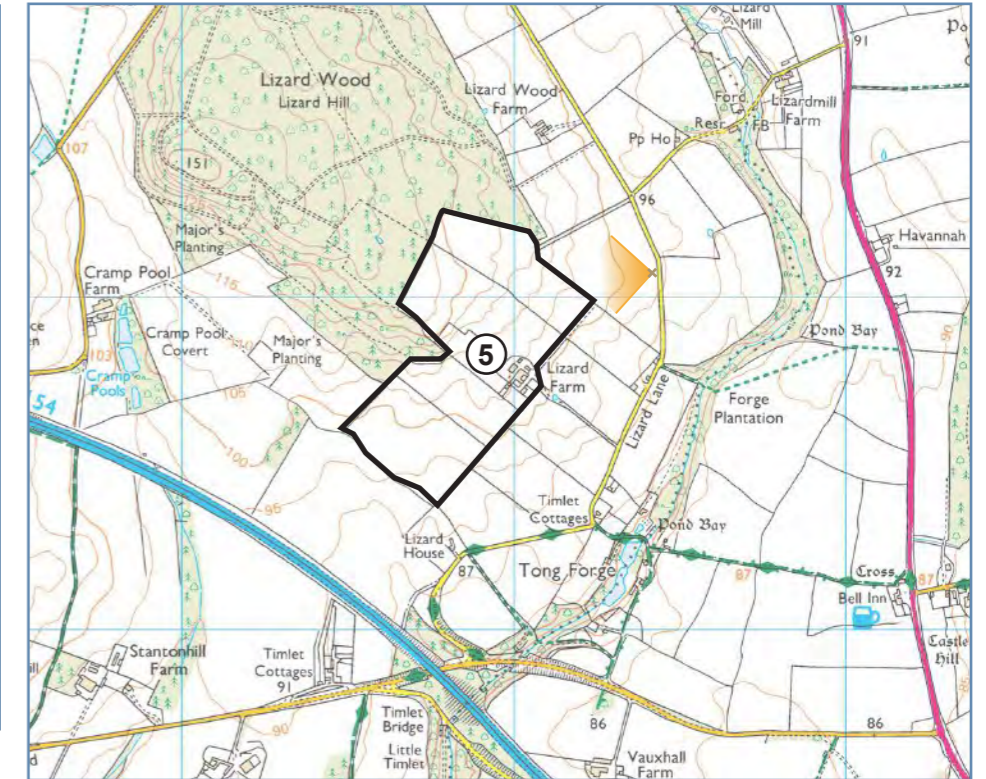
Summary

- Parcel 4 comprises gently sloping agricultural land which sits adjacent to the A41 to the west, and is framed against undulating farmland which rises towards Western Park in the east. The A5 contains the parcel to the north.
- The parcel makes a **Strong** contribution to Green Belt purpose 3.
- It has been assessed that the parcels release from the Green Belt would lead to a **High** level of harm due to its visual connection with the surrounding Green Belt.
- Given the parcel's sensitivity, there are opportunities to retain and enhance the parcel within the Green Belt to provide compensatory improvements.

Parcel 5



Image P5a: The parcel is edged to the west by Lizard Wood which is a prominent feature in the local landscape.



the surrounding countryside (see Image P5b).

8.8 Purpose 4

No Contribution

8.9 The parcel has no intervisibility with the Shifnal historic settlement area. It does however have intervisibility with Tong village.

Purpose 5

8.10 All parcels make an equally significant contribution to this purpose.

Relationship to Settlement / Countryside

- 8.1 Parcel 5 is intrinsically connected to the rural landscape within which it sits. It comprises several agricultural fields which are located on the rising land up towards Lizard Wood that serves as a prominent feature within the landscape, and provides a wooded backdrop to the parcel. There is no urbanising development within the parcel. Lizard Farm is located within the parcel, however this development is in keeping with the characteristics of the countryside.
- 8.2 The parcel's north western boundary abuts Lizard Wood, whilst the remainder of the the parcel's boundaries follow the edges of it's comprising fields.
- 8.3 Parcel 5 is contained within 'P8' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 2 and 4. The conclusions on the contribution of Parcel 5 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

8.5 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Strong

- 8.6 The parcel's sloping agricultural fields and wooded backdrop provide a rural character in the landscape which is uninterrupted by any urbanising development. In this regard the parcel can be considered as spatially open to which is plays a role in safeguarding the countryside from encroachment.
- 8.7 Due to the parcel's location on the sloping land up towards Lizard Wood, there is a high level of intervisibility between the parcel and

Parcel 5

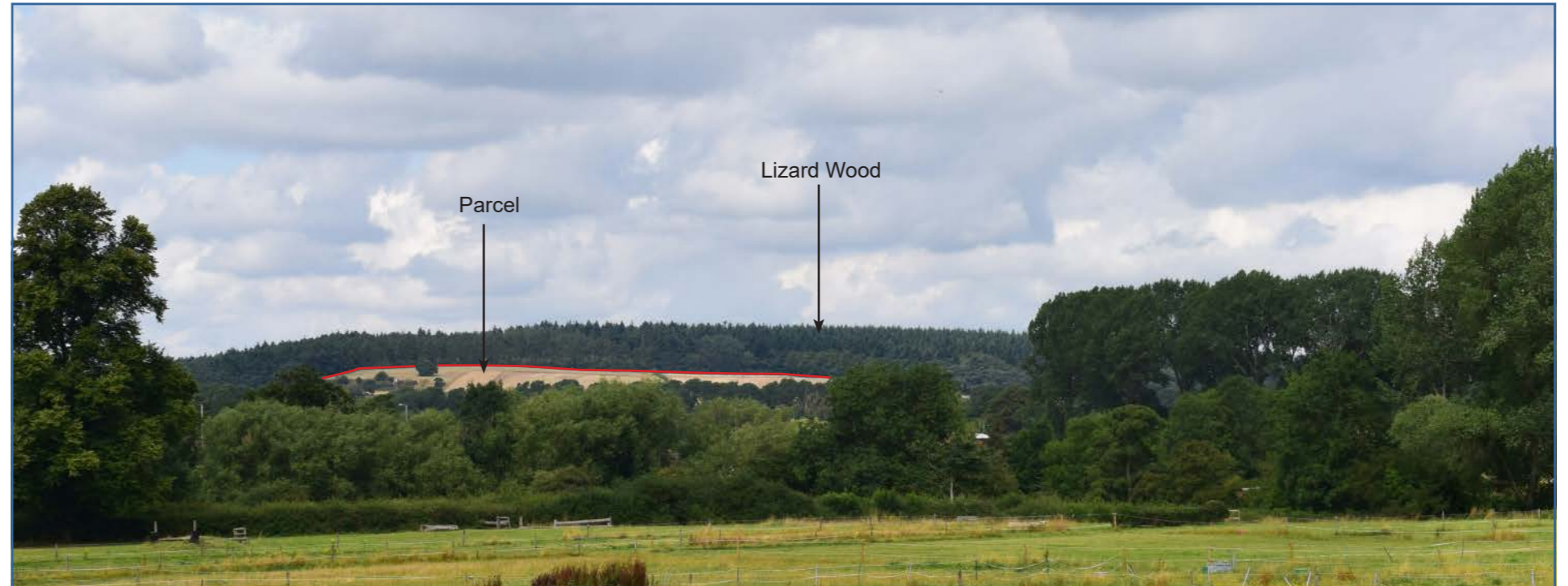


Image P5b: The parcel is visible from the surrounding Green Belt due to its raised topography.

Boundaries

- 8.11 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt
- 8.12 Lizard Wood contains the parcel to the north west and would be considered a 'Strong' new Green Belt boundary as it is both permanent and readily recognisable.
- 8.13 The parcel's north eastern, south eastern and south western boundaries however follow field boundaries defined by low lying hedgerows which would not constitute as strong.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 8.14 The parcel makes a strong contribution to purpose 3 as it consists of uninterrupted agricultural land, which if released from the Green Belt and developed would result in a clear visual and spatial encroachment of the countryside.
- 8.15 Other than purpose 3, the parcel does not contribute to any more of the Green Belt purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 8.16 The parcel is located on visually prominent land within the landscape. As illustrated by **Image P5b** there are open views afforded onto the parcel from the east in Tong. Releasing this parcel from the Green Belt would therefore lead to encroachment on the countryside and could weaken the role neighbouring areas contribute to Purpose 3.
- 8.17 Due to the parcel's sensitivity any development within the parcel would disrupt the rural setting and have adverse effects on the wider Green Belt.

Strength of parcel boundaries

- 8.18 Overall the parcel is contained by a set of weak boundaries which follow the periphery of its comprising field boundaries. The north western boundary however which adjoins Lizard Wood is strong as it is instantly recognisable and is likely permanent.

Potential harm to the Green Belt

- 8.19 Considering the above factors and their combined relationship, judgement has been made 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 5

Potential Mitigation and Boundary Enhancements

8.20 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 5 Mitigation and Enhancement Plan.

Define Green Belt edge using a strong, natural element which forms a visual barrier

1. The parcels western boundary abuts Lizard Wood. This boundary serves as a robust, natural feature within the landscape and forms visual barrier that prevents intervisibility between the parcel and the surrounding countryside to the west. As such, this belt of woodland planting could be used to define the parcels western edge, and where possible be retained and enhanced.

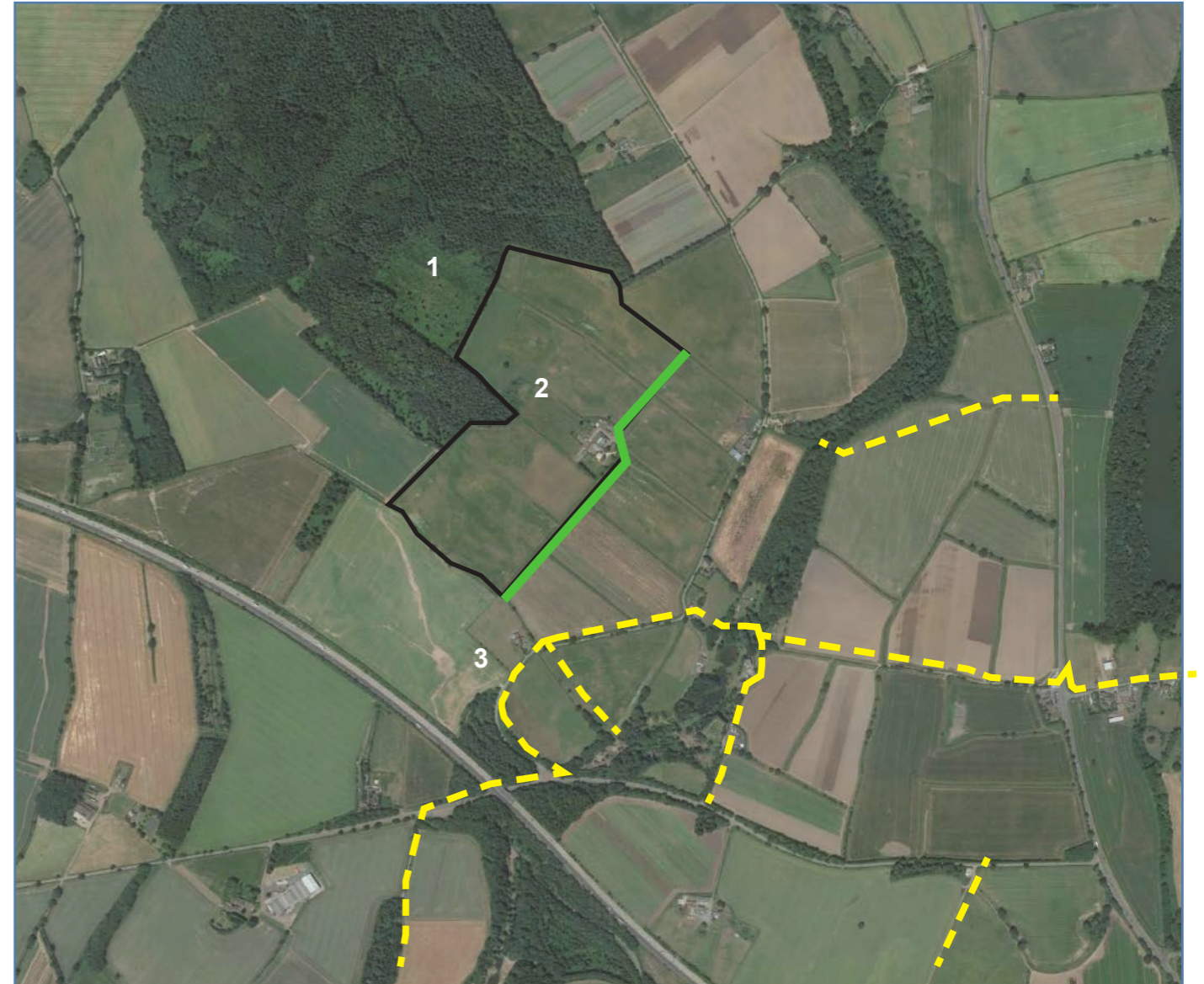
Enhance visual openness within the Green Belt

2. As illustrated in **Image P5b**, the parcel is visible from the surrounding Green Belt due to it sitting on higher ground which leads up to Lizard Wood. Development of parcel would significantly encroach on the visual openness of the Green Belt. Urbanising development of the parcel should therefore be avoided.

Enhance access within the Green Belt

3. There are a number of public footpaths around the parcel connected to Lizard Wood and Dog Wood to the west and Weston Park to the east. There are opportunities to integrate new footpaths within the parcel to connect with the existing PRoW network and therefore improve access to the surrounding Green Belt and countryside.

Parcel 5 Mitigation and Enhancement Plan



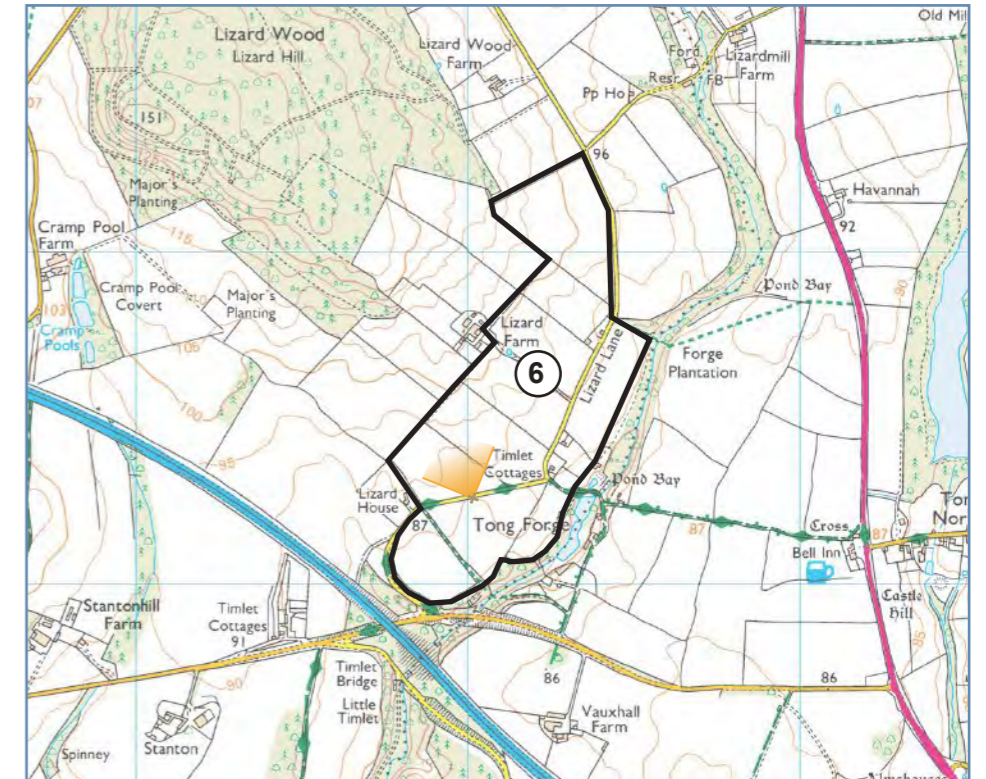
Summary

- Parcel 5 comprises sloping agricultural land which adjoins and is overlooked by Lizard Wood to the north west.
- The parcel makes a **Strong** contribution to Green Belt purpose 3.
- It has been assessed that the parcels release from the Green Belt would lead to a **High** level of harm due to it's connection and intervisibility with the surrounding Green Belt. Development of the parcel would result in a clear visual and spatial encroachment of the countryside.
- Following from these observations, it is recommended the parcel is either retained and enhanced within the Green Belt. If removed, it should be utilised as open space alongside landscape and recreational enhancements.

Parcel 6



Image P6a: The parcel is overlooked to the west by Lizard Wood and the rising land to the west.



Relationship to Settlement / Countryside

- 9.1 Parcel 6 comprises several gently sloping agricultural fields which are nucleated around Lizard Lane. The parcel is bound to the north by a line of Scotts Pine and to the west by field boundaries. To the east, the northern most field of the parcel is edged by Lizard Lane, whilst the remainder of the parcel to the south is edged by the belt of woodland planting associated with the River Worfe. Similarly, the southern extents of the parcel follow the route of the woodland planting.
- 9.2 The parcel, particularly to the west of Lizard Lane, is visually connected to the rising landscape and Lizard Wood to the west (as illustrated in **Image P6a**). There is a commercial haulage yard with it's associated infrastructure and vehicles present along Lizard Lane to the north east of the parcel.
- 9.3 Parcel 5 is contained within 'P8' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 2 and 4. The conclusions on the contribution of Parcel 5 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 9.5 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Moderate

- 9.6 The parcel is largely free from built development comprising spatially open agricultural fields which are divided by low lying hedgerow planting. The Timlet Cottages which sit to the south east of the parcel are in keeping with the characteristics of the countryside.
- 9.7 However to the north east of the parcel on Lizard Lane, the

haulage yard with it's associated buildings and vehicles detract from the parcel's rurality.

- 9.8 Although there is intervisibility within the parcel and between the sloping countryside to the west, intervisibility with the Green Belt land to the east is obstructed by the woodland planting associated with the River Worfe. Furthermore, substantial boundary planting adjacent to both sides of Lizard Lane prevents intervisibility from east to west.

Purpose 4

No Contribution

- 9.9 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 9.10 All parcels make an equally significant contribution to this purpose.

Parcel 6



Image P6b: To the east, the parcel is edged by Lizard Wood which prevents intervisibility between the parcel and the wider Green Belt to the east.

Boundaries

- 9.11 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 9.12 The parcel is bounded to the east and south by the River Worfe and its associated woodland planting. As illustrated on the context map above, this landscape feature is robust and recognisable, therefore constituting a strong Green Belt boundary.
- 9.13 The parcel is contained to the west by Lizard Lane. Whilst the councils assessment does not constitute this road as a 'Strong' boundary, it is robust and readily recognisable.
- 9.14 Each of the parcels boundaries are lined by robust belts of planting which serve to contain the parcel from the surrounding landscape.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 9.15 The parcel makes a moderate contribution to purpose 3 comprising uninterrupted agricultural land which displays characteristics of the countryside. Releasing the parcel from the Green Belt would therefore lead to encroachment of the countryside.

- 9.16 However, commercial development is present within the parcel to the north east in the form of the haulage yard with it's associated infrastructure and vehicles.
- 9.17 Other than purpose 3, the parcel does not contribute to any more of the Green purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 9.18 The parcels release from the Green Belt would not have an adverse impact on the integrity of the neighbouring Green Belt land due to its containment from the wider landscape. The parcel sits within a well screened enclosure whereby the woodland associated with the River Worfe, boundary planting adjacent to the A5 and Lizard Lane, and internal field boundaries serve to limit invisibility between the parcel and the surrounding Green Belt land. The effects of development would therefore be largely localised to within the parcels boundaries.

Strength of parcel boundaries

- 9.19 The parcels eastern and southern boundary comprises the woodland associated with the River Worfe. This would constitute a strong Green Belt boundary as it is both recognisable and likely permanent.

- 9.20 To the north, the parcel is edged by a line of Scotts Pine which follows a field boundary. Whilst this would not constitute a strong boundary, it is a distinguishable feature in the landscape.
- 9.21 The parcels western boundary consists of low lying hedgerows which follow the field boundaries. This would not constitute a strong Green Belt boundary

Potential harm to the Green Belt

- 9.22 Considering the above factors and their combined relationship, judgement has been made 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 6

Potential Mitigation and Boundary Enhancements

9.23 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 6 Mitigation and Enhancement Plan.

Strengthen boundary at weak points and use landscaping to help integrate new Green Belt boundary

1. At present, the parcel's western boundary would not constitute as a strong Green Belt boundary. There are opportunities therefore to enhance the physical and visual robustness of the existing field boundaries with woodland and tree belt planting.

Define Green Belt edge using a strong, natural element which forms a visual barrier

2. The parcel's eastern boundary comprises the River Worfe alongside the belt of woodland planting which encloses it. This boundary serves as a robust, natural feature within the landscape and forms visual barrier that prevents intervisibility between the parcel and the surrounding countryside. This belt of woodland planting could be used to define the parcel's eastern edge, and where possible be retained and enhanced.

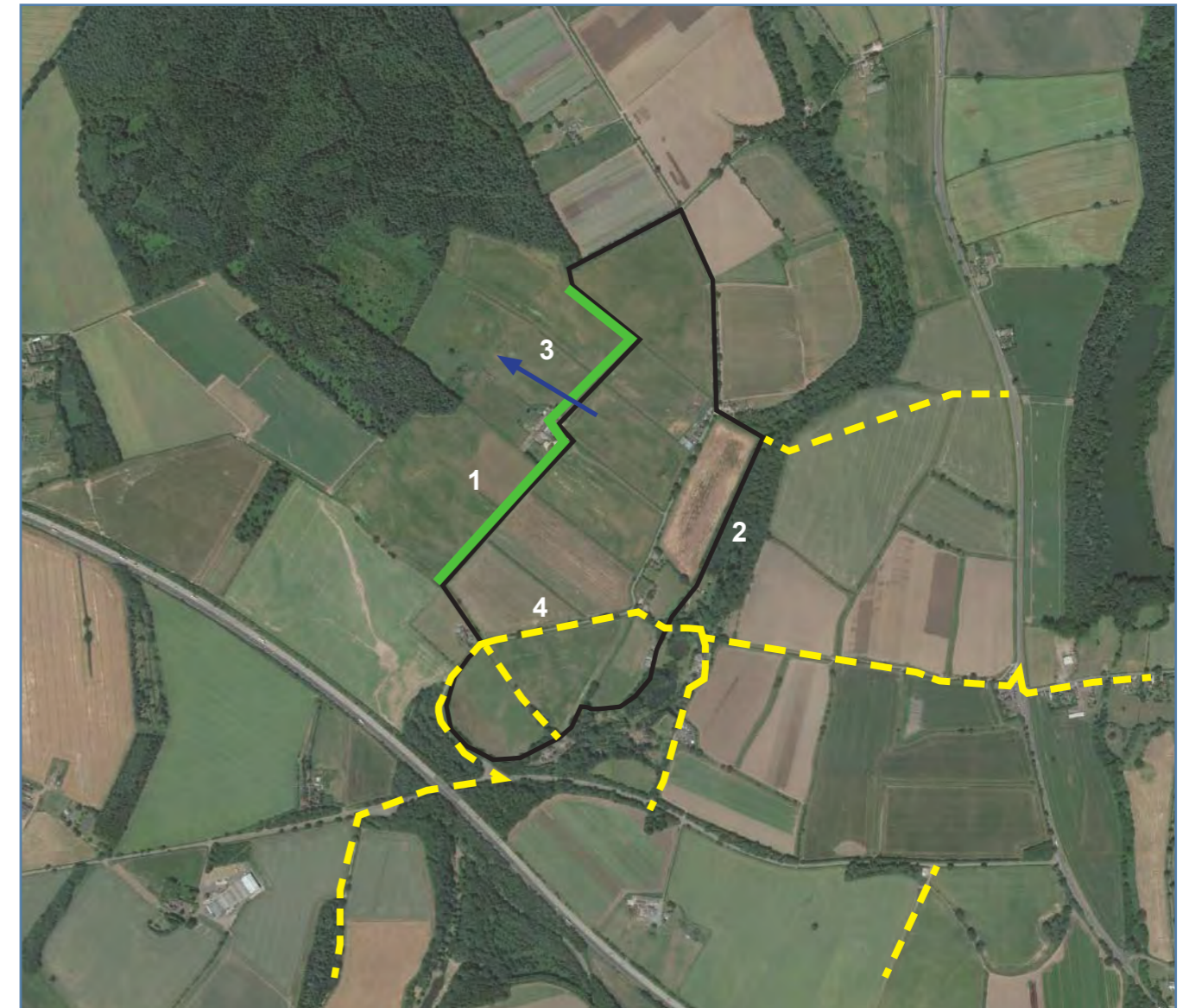
Enhance visual openness within the Green Belt

3. There are opportunities to retain the parcel's visual relationship with Lizard Wood to the west which sits on higher ground forming a wooded backdrop. This would increase the extent to which the parcel is perceived as relating to the wider countryside.

Enhance access within the Green Belt

4. There are a number of public footpaths around the parcel connected to areas to Lizard Wood and Dog Wood to the west and Weston Park to the east. There are opportunities to integrate new footpaths within development to connect with the existing PRow network and therefore improve access to the surrounding Green Belt and countryside.

Parcel 6 Mitigation and Enhancement Plan



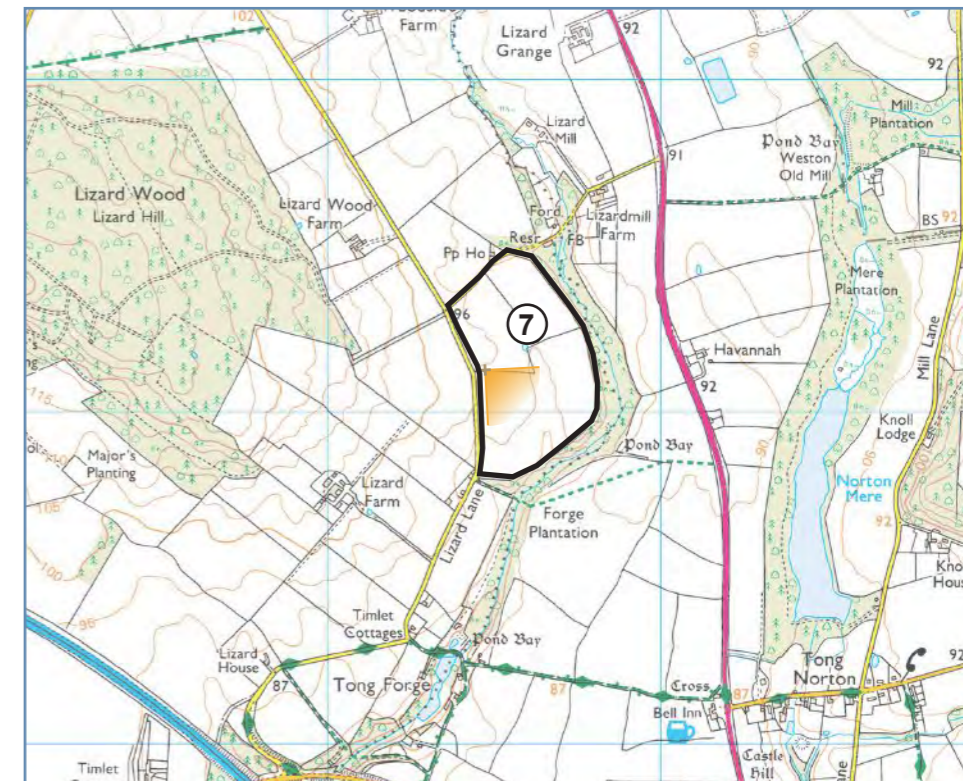
Summary

- Parcel 6 consists of gently undulating agricultural land which is overlooked by Lizard Wood to the west and adjoins the belt of woodland planting associated with the River Worfe to the east. Lizard Lane traverses through the parcel from south to north.
- The parcel makes a **Moderate** contribution to Green Belt purpose 3.
- It has been assessed that the parcel's release from the Green Belt would lead to a **Moderate** level of harm. Even though there would be adverse effect on the spatial openness of the parcel subsequent to development, the effects would be localised due to the parcel's visual containment from the wider Green Belt to the east and south. There is also already a degree of encroachment on the parcel due to the presence of the Haulage Yard and its associated infrastructure.
- In the circumstance of the parcel's Green Belt release, there are opportunities to enhance the parcel's western boundary. At present it comprises low lying hedges which follow the existing boundaries.

Parcel 7



Image P7a: The parcel sits within a wooded enclosure formed by the belt of tree planting surrounding the River Worfe.



Relationship to Settlement / Countryside

- 10.1 Parcel 7 comprises relatively flat agricultural land which is divided into three arable fields separated by hedgerow and hedge tree planting. The parcel sits within a well screened enclosure which is formed by the River Worfe and its associated woodland planting. The parcel contains no urbanising development, although the roofline of properties to the south of the parcel are slightly visible.
- 10.2 The parcel is contained to the north by an unnamed road which leads to Lizard Mill Farm alongside dense boundary planting. To the east and south, the parcel is enclosed by woodland which follows the course of the River Worfe (see **Image P7a** above). The parcel's western boundary follows Lizard Lane.
- 10.3 Parcel 7 is contained within 'P8' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 2 and 4. The conclusions on the contribution of Parcel 7 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 10.5 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Strong

- 10.6 The parcel comprises agricultural fields and wooded backdrop resulting in a rural character in the landscape which is uninterrupted by any urbanising development. In this regard the parcel can be considered as spatially open to which plays a role in safeguarding the countryside from encroachment.
- 10.7 The parcel is contained by a set of robust boundaries which serve

to limit intervisibility between the parcel and the surrounding countryside / wider Green Belt to the north and east.

Purpose 4

No Contribution

- 10.8 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 10.9 All parcels make an equally significant contribution to this purpose.

Parcel 7

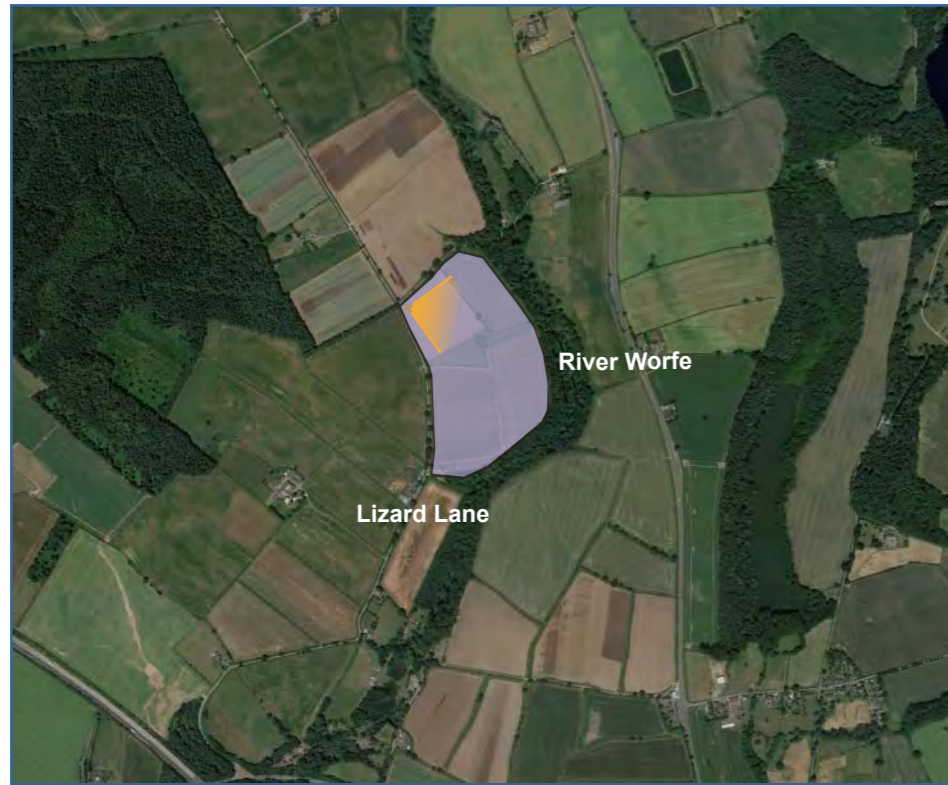


Image P7b: There is no intervisibility between the parcel and the surrounding countryside to the east.

Boundaries

- 10.10 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 10.11 The parcel is bounded to the east and south by the River Worfe and its associated woodland planting. As illustrated on the context map above, this landscape feature is robust and instantly recognisable, therefore constituting a strong Green Belt boundary.
- 10.12 The parcel is contained to the west by Lizard Lane and to the north by an unnamed road. The councils assessment does not constitute these roads as a 'Strong' boundaries, however they are both robust and readily recognisable.
- 10.13 Each of the parcels road boundaries are lined by robust belts of planting which serve to contain the parcel from the surrounding landscape.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 10.14 The parcel makes a strong contribution to purpose 3 as it consists of uninterrupted agricultural land, which if released from the Green Belt and developed would result in an encroachment of the

countryside.

- 10.15 Other than purpose 3, the parcel does not contribute to any more of the Green purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 10.16 As a result of the parcels enclosure from the wider landscape, its release from the Green Belt would not have a directly adverse impact on the integrity of the neighbouring Green Belt. The parcel is contained by a set of visually and physically defensible boundaries, particularly to the east and south whereby the woodland planting associated with the course of the River Worfe limits intervisibility between the parcel and the wider countryside/ Green Belt. The parcels internal field boundaries also serve to obstruct views from within the parcel.

- 10.17 The effects of development would therefore be largely localised to within the parcels boundaries.

Strength of parcel boundaries

- 10.18 To the east and south, the parcel is contained by the woodland which encompasses the River Worfe. As aerial photography shows, this boundary is highly robust and readily recognisable.
- 10.19 To the east the parcel is defined by Lizard Lane which is both

recognisable and likely permanent. The parcel's northern boundary edges an unnamed road which leads to Lizard Mill Farm.

Potential harm to the Green Belt

- 10.20 Considering the above factors and their combined relationship, judgement has been made 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 7

Potential Mitigation and Boundary Enhancements

10.21 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 6 Mitigation and Enhancement Plan.

Strengthen boundary at weak points and use landscaping to help integrate new Green Belt boundary

1. Hedgerows and hedgerow trees along Lizard Lane that define the parcels western boundary should be retained and enhanced, with any weak points strengthened to minimise the impact of development on the wider Green Belt to the west.

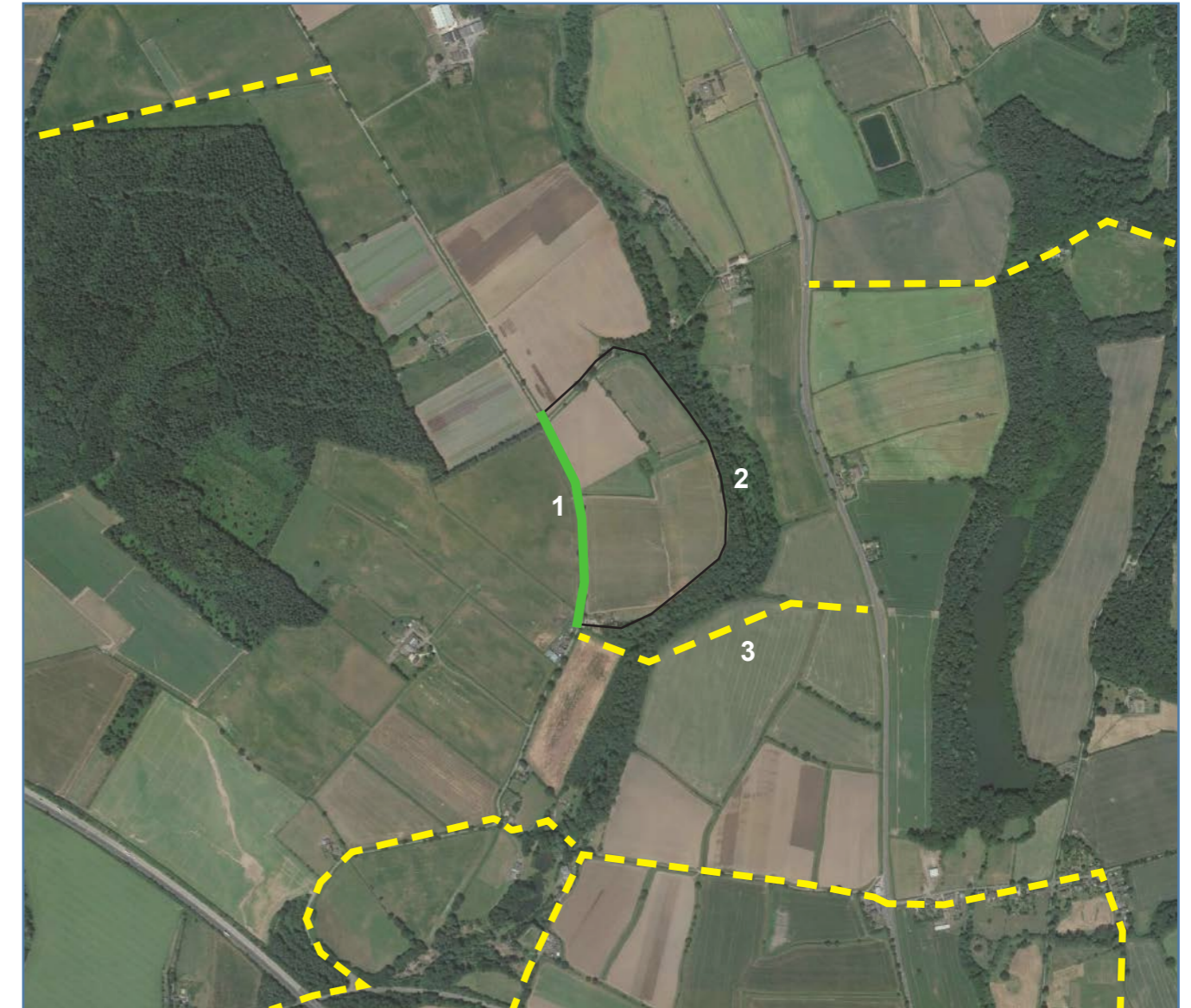
Define Green Belt edge using a strong, natural element which forms a visual barrier

2. The parcels eastern boundary comprises the River Worfe alongside the belt of woodland planting which encloses it. This boundary serves as a robust, natural feature within the landscape and forms visual barrier that prevents intervisibility between the parcel and the surrounding countryside. This belt of woodland planting could be used to define the parcels eastern edge, and where possible be enhanced.

Enhance access within the Green Belt

3. There are a number of public footpaths around the parcel connected to Lizard Wood and Dog Wood to the west and Weston Park to the east. There are opportunities to integrate new footpaths within development to connect with the existing PRoW network and therefore improve access to the surrounding Green Belt and countryside

Parcel 7 Mitigation and Enhancement Plan



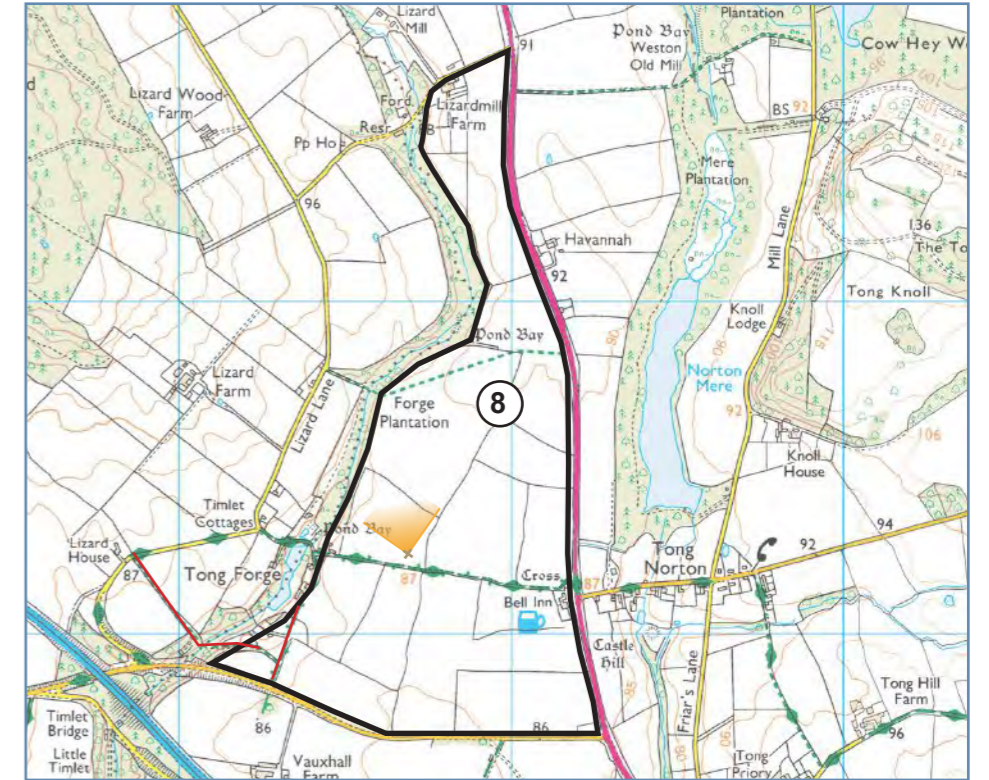
Summary

- Parcel 7 comprises relatively flat agricultural land which is enclosed by the woodland associated with the River Worfe to the east and by Lizard Lane to the west.
- The parcel makes a **Strong** contribution to Green Belt purpose 3.
- It has been assessed that the parcels release from the Green Belt would lead to a **Moderate** level of harm. Even though there would be adverse effect on the spatial openness of the parcel subsequent to development, the effects would be localised due to the parcels visual containment from the wider Green Belt.
- There are opportunities to retain and enhance the parcel's sense of enclosure to ensure the effects of development are localised.

Parcel 8



Image P8a: The parcel comprises numerous arable fields and is physically and visually enclosed to the west by the belt of woodland planting associated with the River Worfe.



Relationship to Settlement / Countryside

- 11.1 Parcel 8 comprises several arable fields that are separated by robust hedgerows and hedge tree planting. The parcel sits between the A41 / Newport Road to the east, the belt of woodland surrounding the River Worfe to the west, and Stanton Road to the south. Monarch's Way traverses the parcel from east to west in the south, connecting the parcel to Tong.
- 11.2 Parcel 8 is contained within 'P8' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 2 and 4. The conclusions on the contribution of Parcel 8 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 11.4 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Moderate

- 11.5 The parcel makes a moderate contribution to purpose 3. There is little sense of encroachment in the parcel to the west.
- 11.6 However, the A41 / Newport Road detracts from the overall rural character of the parcel to the east as it is suspect to high levels of traffic. There is no robust visual boundary between the road and the parcel. A pub and small petrol station and associated areas of

hardstanding also branch off from the A41 into the parcel and have an urbanising influence on the adjoining fields to the east and lead to a sense of encroachment.

- 11.7 Intervisibility within the parcel and between the surrounding countryside is limited due to the physically and visually robust internal field boundaries.

Purpose 4

No Contribution

- 11.8 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 11.9 All parcels make an equally significant contribution to this purpose.

Parcel 8



Image P8b: The A41/Newport Road is a prominent man-made feature which runs parallel to the parcels eastern boundary.

Boundaries

- 11.10 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 11.11 The parcel is contained to the east by the A41 which would serve as a readily recognisable and permanent Green Belt boundary. Although not as strong, Stanton Road to the south provides a robust boundary which is instantly recognisable.
- 11.12 To the west, the parcel is contained by Lizard Wood which serves as a robust and likely permanent boundary, whilst an unnamed road which leads to Lizard Mill Farm constitutes a weak boundary to the north.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 11.13 It has been assessed that parcel 8 makes a moderate contribution to purpose 3 because development within the parcel would encroach on the countryside. However the A41, alongside the pub and petrol station which branch from it, serve as urbanising influences to the east.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 11.14 The effects of development would be largely localised to within the parcel's boundaries. The parcel sits within a well screened enclosure whereby robust boundary planting adjacent to Stanton Road to the south and the woodland to the west prevents intervisibility between the parcel and the surrounding countryside. Additionally, the parcel's internal field boundaries are both physically and visually robust which lead to a sense of containment. For these reasons, the parcels release from the Green Belt would not have an adverse impact on the integrity of the neighbouring Green Belt.

Strength of parcel boundaries

- 11.15 The parcel is contained by a set of strong boundaries particularly to the east and west in the form of the A41 and belt of woodland planting respectively. Stanton Road to the south whilst not as strong is still instantly recognisable and likely permanent.

Potential harm to the Green Belt

- 11.16 Considering the above factors and their combined relationship, judgement has been made that 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.



Low-moderate harm

Parcel 8

Potential Mitigation and Boundary Enhancements

11.17 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 8 Mitigation and Enhancement Plan.

Strengthen boundary at weak points and use landscaping to help integrate new Green Belt boundary

1. Hedgerows and hedgerow trees along the A41 that define the parcels eastern boundary should be retained and enhanced, with any weak points strengthened to minimise the impact of development on the wider Green Belt and soften / screen new development edge.

Define Green Belt edge using a strong, natural element which forms a visual barrier

2. The parcel is contained to the west by Lizard Wood. This boundary serves as a robust, natural feature within the landscape and forms visual barrier that prevents intervisibility between the parcel and the surrounding countryside to the west. As such, this belt of woodland planting could be used to define the parcels western edge, and where possible be retained and enhanced.

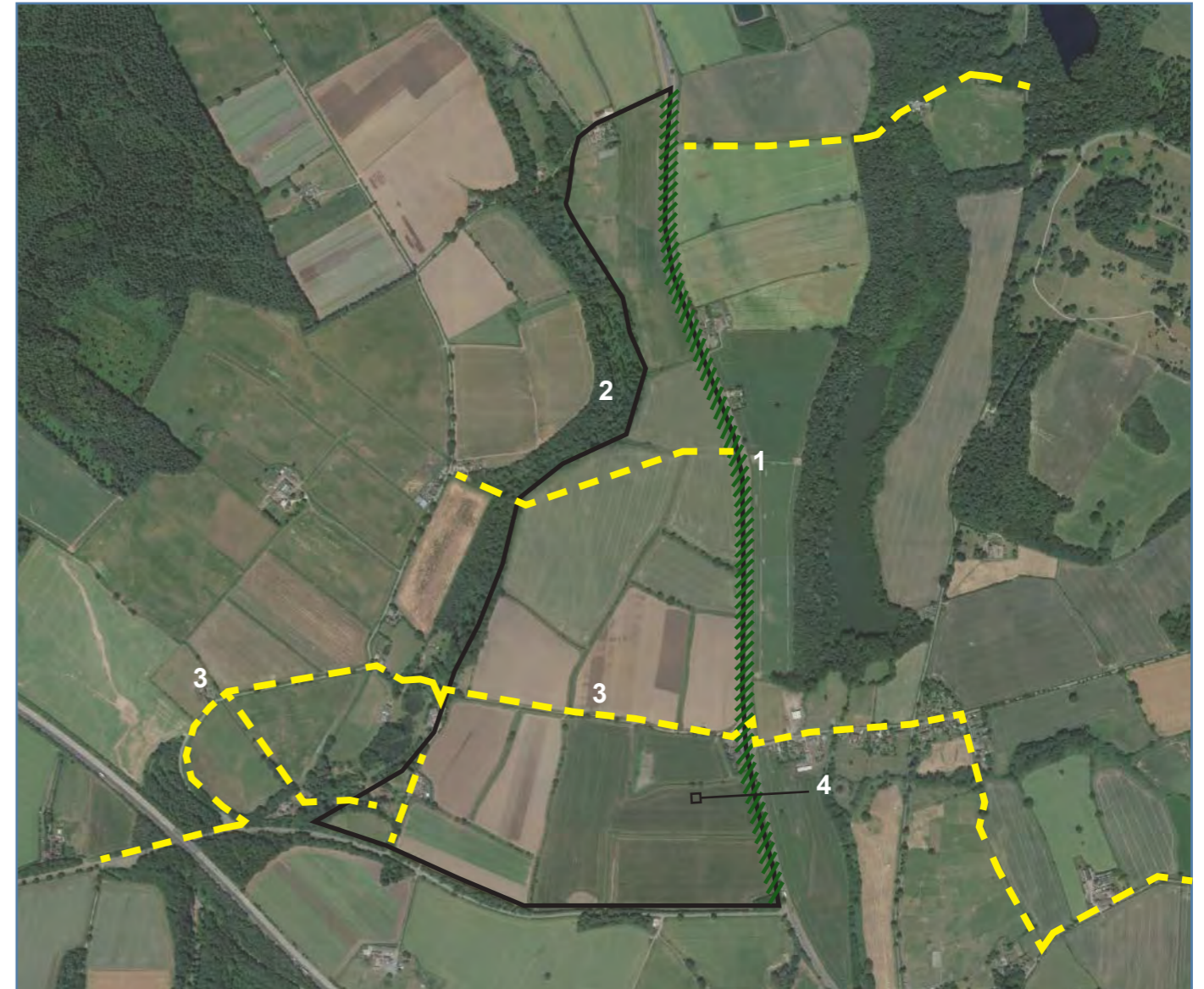
Enhance access within the Green Belt

3. The parcel is traversed by two public footpaths, one of which is Monarchs Way that connects the parcel to Tong to the east. There are opportunities to integrate new footpaths within development to connect with the existing PRoW network and therefore improve access to the surrounding Green Belt and countryside.

Enhance visual openness within the Green Belt

4. Due to the large scale of the parcel, there are opportunities for development to incorporate large areas of open space to create a strong visual relationship with the countryside.

Parcel 8 Mitigation and Enhancement Plan



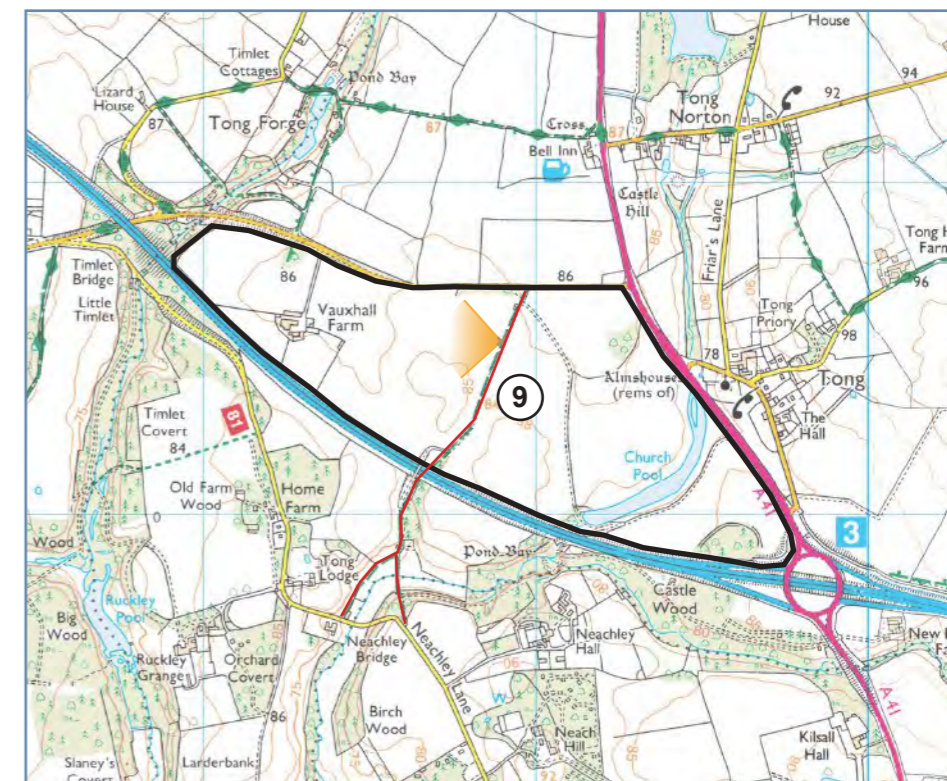
Summary

- Parcel 8 comprises relatively flat agricultural land which sits between Lizard Wood to the west and Lizard Lane to the east.
- The parcel makes a **Moderate** contribution to Green Belt purpose 3.
- It has been assessed that the parcels release from the Green Belt would lead to a **Low-Moderate** level of harm. To the east, the A41 stands as a prominent built feature which infringes on the rural characteristics of the parcel. There is limited intervisibility within the parcel and with the surrounding countryside due to the visually robust internal field boundaries and the belt of woodland planting to the west.
- Subsequent to the parcels Green Belt release, proposals should seek to offer visual and physical improvements to the parcels eastern boundary adjacent to the A41 in the form of characteristic planting. Doing so would soften the perceived development edge.

Parcel 9



Image P9a: The parcel comprises open agricultural fields which are contained to the south by the M54.



Relationship to Settlement / Countryside

- 12.1 Parcel 9 comprises relatively flat agricultural land free of built development, other than Vauxhall Farm which is congruous with its rural surroundings. The southern boundary of the parcel lies adjacent to the M54 motorway. To the north, the parcel is bounded by Stanton Road and to the east by the A41 Newport Road. The M54 to the south exerts a level of encroachment on the parcel, however Parcel 9 is undeveloped and forms part of the open countryside. Church Pool and a dense block of woodland planting sit to the south east of the parcel.
- 12.2 Parcel 9 of this assessment represents the same area of land covered by 'P25' in the Shropshire Green Belt Assessment, which was judged to make a Strong contribution to Purpose 3 and Weak contribution to Purpose 2. This assessment agrees with the council's for the following reasons.

Purpose 1

No Contribution

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

Purpose 2

Weak

- 12.4 The parcel does not sit directly between the settlements of Shifnal and Albrighton. Even though receptors travelling along the M54 may perceive a relationship between the two settlements, intervisibility is highly fragmented due to boundary vegetation and embankments. Loss of openness would not be perceived as reducing the gap between the settlements.

Purpose 3

Moderate

- 12.5 The parcel consists of large open agricultural fields used for arable farming which perpetuate the rural character of the wider area. Vauxhall Farm sits to the west of the parcel however does not detract from overall rurality. The M54 however, which edges the

parcel to the south, serves as a strong feature which can be seen from within the parcel, providing containment.

- 12.6 The parcel's eastern and northern hedgerow / hedgerow tree boundaries serve to limit intervisibility between the parcel and the surrounding countryside to the north and east, although parts of the Tong village roof-line are framed by the vegetation (see **Image P9b**).

Purpose 4

No Contribution

- 12.7 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 12.8 All parcels make an equally significant contribution to this purpose.

Parcel 9



Image P9b: There is a substantial block of woodland planting to the east of the parcel which visually encompasses Tong.

Boundaries

- 12.9 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 12.10 As recognised by the Shropshire Green Belt Review, the parcel is bounded to the south by the M54 motorway which would constitute a strong boundary. The northern and eastern boundaries would be defined by Stanton Road and the A41 and are clearly defined and readily recognisable as Green Belt boundaries.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 12.11 The parcel makes a moderate contribution to purpose 3. Despite the parcel comprising agricultural land which is open and rural, the presence of the M54 which runs along the parcel's southern boundary exerts a level of encroachment and detracts from the overall rurality. To a lesser degree, the A41 also serves as an urbanising influence.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 12.12 The effects of development within the parcel would be localised to

within its boundaries. Even though intervisibility within the parcel is expansive due to the size of its fields, the parcel is visually contained from the surrounding area.

- 12.13 The parcel's release from the Green Belt would not have an adverse impact on the integrity of the neighbouring Green Belt.

Strength of parcel boundaries

- 12.14 The M54, A41 and Stanton Road are all clearly defined and readily recognisable. The parcel is therefore contained by a set of robust boundaries which would constitute strong new Green boundaries.

Potential harm to the Green Belt

- 12.15 Considering the above factors and their combined relationship, judgement has been made 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.



Moderate harm

Parcel 9

Potential Mitigation and Boundary Enhancements

12.16 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 9 Mitigation and Enhancement Plan.

Preserve/enhance landscape elements which contribute to the setting of Historic settlements

1. As illustrated in **Image 9b**, the hamlet of Tong is visible to the east. There are opportunities to preserve the historic setting of the settlement by retaining and intervisibility with development proposals.

Strengthen boundary at weak points and use landscaping to help integrate new Green Belt boundary

2. There are opportunities to retain and enhance the vegetation planting along parcel's southern boundary adjacent to the M54. Doing so helps to visually contain development within the parcel whilst also strengthening the new Green Belt boundary.

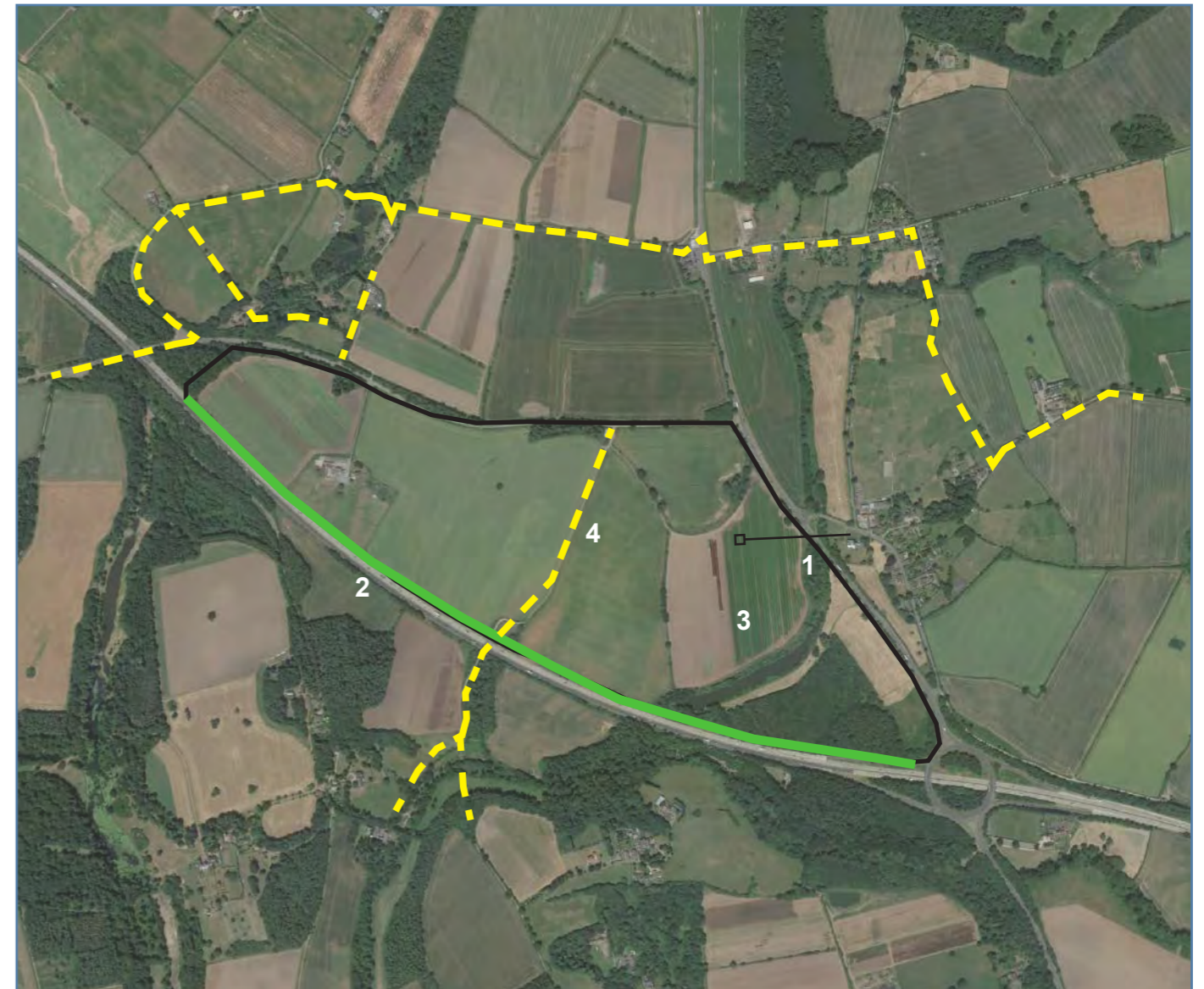
Enhance visual openness within the Green Belt

3. In conjunction with recommendation 1 above, there are opportunities to incorporate areas of open space to the east of the parcel alongside the block of woodland planting which would enhance the perceived visual openness.

Enhance access within the Green Belt

4. The parcel is traversed from north to south by a public footpath which connects the parcel to areas surrounding settlements. There are opportunities to integrate new footpaths within development to connect with the existing PRow network and therefore improve access to the surround Green Belt and countryside.

Parcel 9 Mitigation and Enhancement Plan



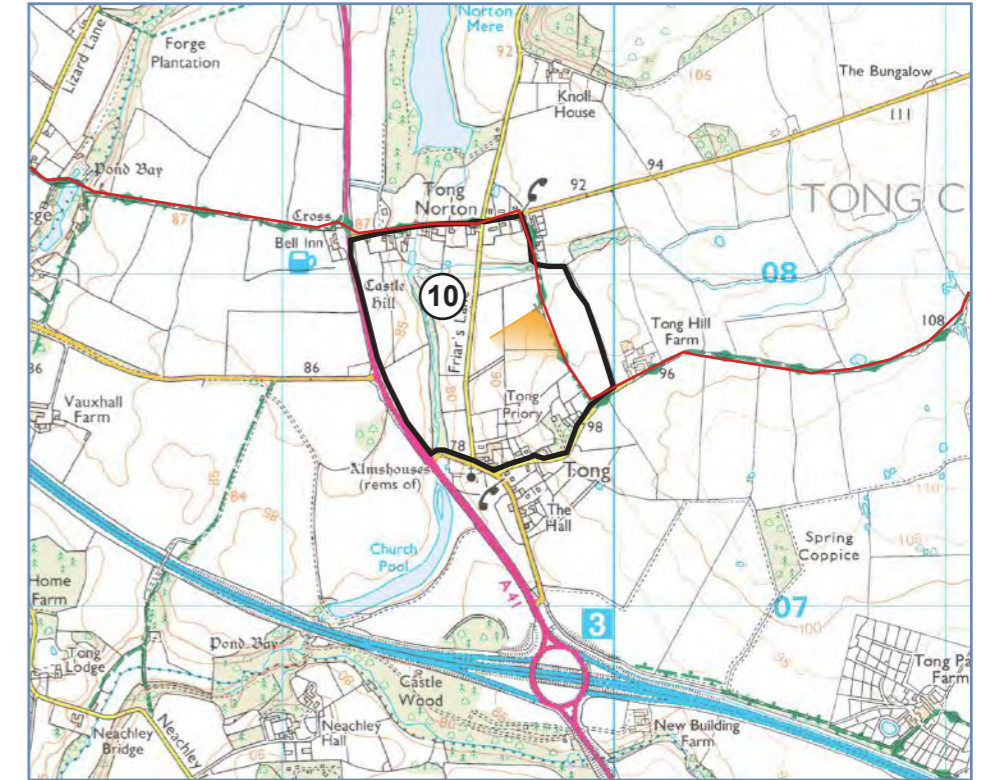
Summary

- Parcel 9 comprises relatively flat agricultural land which abuts the M54 to the south.
- The parcel makes a **Moderate** contribution to Green Belt purpose 3.
- It has been assessed that the parcels release from the Green Belt would lead to a **Moderate** level of harm as although development within the parcel would result in spatial encroachment of the countryside, the M54 already serves as a major urbanising influence which detracts from the parcel's rurality.
- Subsequent to the parcel's Green Belt release, there are opportunities for proposals to provide enhancements to the southern boundary and integrate areas of open space in conjunction with the block of woodland planting which encompasses views of Tong.

Parcel 10



Image P10a: The parcel comprises gently sloping agricultural fields which sit between Tong and Tong Norton.



Relationship to Settlement / Countryside

- 13.1 Parcel 10 consists of softly rolling agricultural land which encompasses Tong and Tong Norton to the south and north respectively. The two settlements are adjoined by both Friar's Lane which runs through the centre of the parcel from north to south, and Monarch's Way which also runs from north to south to the east of the parcel. The parcel is bound to the north by Offoxey Road to which Tong Norton centres around. To the east the parcel is contained by a single field boundary which spans the eastern extents. The parcel is edged to the south by Hubbal Lane, whilst to the west the parcel's boundary follows Newport Road / the A41.
- 13.2 Parcel 10 is contained within 'P26' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and Weak contribution to Purpose 4. The conclusions on the contribution of Parcel 1 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 13.4 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Strong

- 13.5 The hamlets of Tong and Tong Norton are enclosed within the parcel to the north and south, and are both washed over by the Green Belt. The parcel is relatively free from built development aside from the development associated with the two hamlets which display characteristics in keeping with the surrounding rural context. Subsequent to the parcel's Green Belt release - development would lead to encroachment of the countryside and

detract from the rural character of Tong.

Purpose 4

No Contribution

- 13.6 The parcel has no intervisibility with the Shifnal historic settlement area.

Purpose 5

- 13.7 All parcels make an equally significant contribution to this purpose.

Parcel 10



Image P10b: The parcel is well contained from the surrounding Green Belt however is framed within the historic context of Tong and Tong Norton.

Boundaries

- 13.8 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 13.9 The A41 / Newport Road would constitute a strong boundary to the west. Whilst not as strong, the parcel's northern and southern boundaries, Offoxey Road and Hubbal Lane, are readily recognisable and likely permanent. The field edge which defines the parcel's eastern boundary would not constitute a strong Green Belt boundary, although it is physically and visually robust.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 13.10 The parcel makes a strong contribution to purpose 3 consisting of agricultural land which displays characteristics of the countryside. The land between the two settlements, which are both washed over by the Green Belt, is free from encroaching development. Furthermore, the eastern half of the parcel is visually open and susceptible to views from the Monarch's Way and from Tong.

- 13.11 Other than purpose 3, the parcel does not contribute to any more of the Green Belt purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 13.12 Although there are open views afforded across the parcel from within its boundaries, the parcel is well contained from the wider Green Belt due to its visually robust boundaries. The effects of development would therefore be largely localised to within the parcel's boundaries.

Strength of parcel boundaries

- 13.13 Overall the parcel's boundaries would constitute as strong new Green Belt boundaries. The A41 and to a lesser degree Offoxey Road and Hubbal Lane are both recognisable and likely permanent. The field boundary which contains the site to the east is both physically and visually robust.

Potential harm to the Green Belt

- 13.14 Considering the above factors and their combined relationship, judgement has been made 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.



Moderate-high harm

Parcel 10

Potential Mitigation and Boundary Enhancements

13.15 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 10 Mitigation and Enhancement Plan.

13.16 Given Parcel 10's intrinsic relationship with Tong and Tong Norton, any development within the parcel would have directly adverse impacts on the historic setting of the two Hamlets. It is therefore recommended that the parcel remains within the Green Belt for compensatory improvements

13.17 The NPPG on Green Belts sets out:

13.18 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. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision

13.19 There is SAM contained within the parcel to the north and a SAM adjacent to the south. There are opportunities to incorporate the land around these SAM as open space, offering opportunities for education and appreciation of the historic context.

Parcel 10 Mitigation and Enhancement Plan



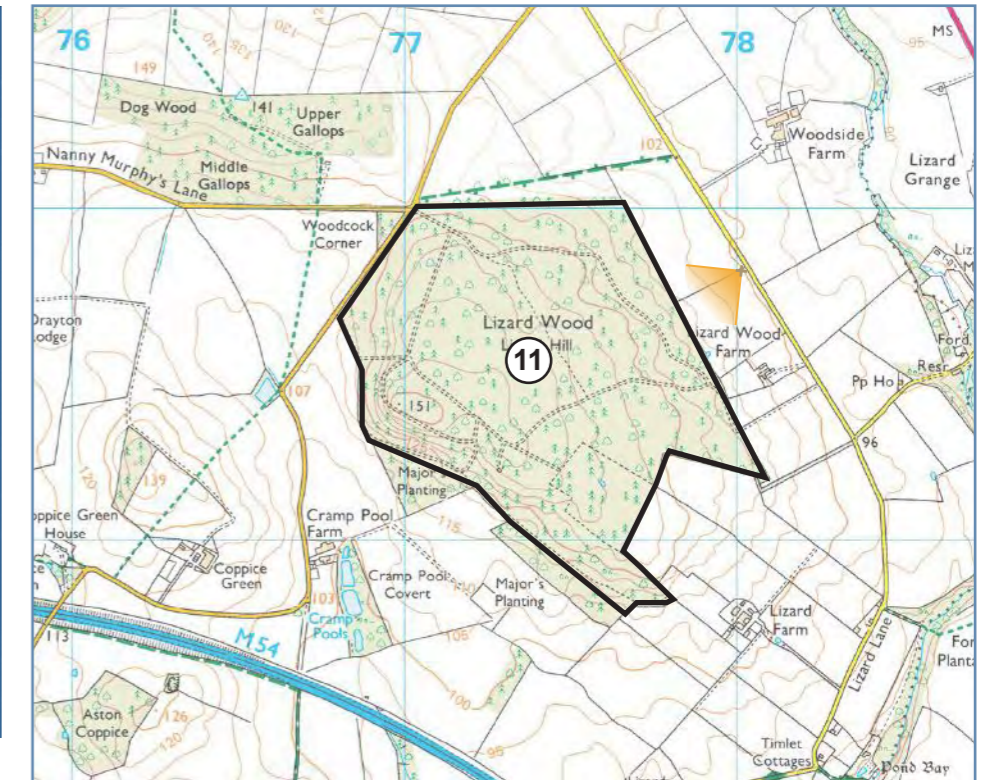
Summary

- Parcel 10 comprises gently sloping agricultural land which sits between Tong and Tong Norton.
- The parcel makes a **Strong** contribution to Green Belt purpose 3.
- It has been assessed that the parcels release from the Green Belt would lead to a **Moderate - High** level of harm. Even though the parcel is relatively well contained from surrounding Green Belt, development would have adverse impacts on the historic setting and character created by the two Hamlets.
- Given the parcel's 'High' harm to Green Belt release, it is recommended that the parcel remains as part of the Green Belt with opportunities for compensatory improvements in line with the NPPG.

Parcel 11



Image P11a: The parcel comprises woodland associated with Lizard Wood.



Relationship to Settlement / Countryside

- 14.1 Parcel 11 covers approximately 90 Ha comprising Lizard Wood. The topography of the parcel slopes from approximately 115m AOD in the east to 151m AOD in the west. Due to its sloping topography, the parcel forms a prominent feature within the wider landscape where it sits on higher ground and overlooks much of the area. The extents of the parcel are defined by the edges of the woodland.
- 14.2 Parcel 11 is contained within 'P4' of the Shropshire Green Belt Assessment which was judged to make a Strong contribution to Purpose 3 and weak contribution to Purpose 4. The conclusions on the contribution of Parcel 11 to the Green Belt purposes and the harm of releasing it from the Green Belt are set out in the descriptions below.

Purpose 1

No Contribution

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

Purpose 2

No Contribution

- 14.4 The parcel does not lie directly between two settlements that are being considered under Purpose 2 for this assessment. It therefore does not make a contribution to purpose 2.

Purpose 3

Strong

- 14.5 The parcel is made up of Lizard wood and it's comprising woodland planting. The parcel is free from any form of development. Due to Lizard Wood's raised topography on-top of which sits a dense body of woodland planting, the parcel forms a wooded backdrop in the wider landscape and serves as a distinguishable landscape feature. There is a high level of intervisibility between the parcel and the surrounding Green Belt.

Purpose 4

No Contribution

- 14.6 Despite its visual prominence in the surrounding area, the parcel has no intervisibility with the Shifnal or Albrighton historic settlement area.

Purpose 5

- 14.7 All parcels make an equally significant contribution to this purpose.

Parcel 11

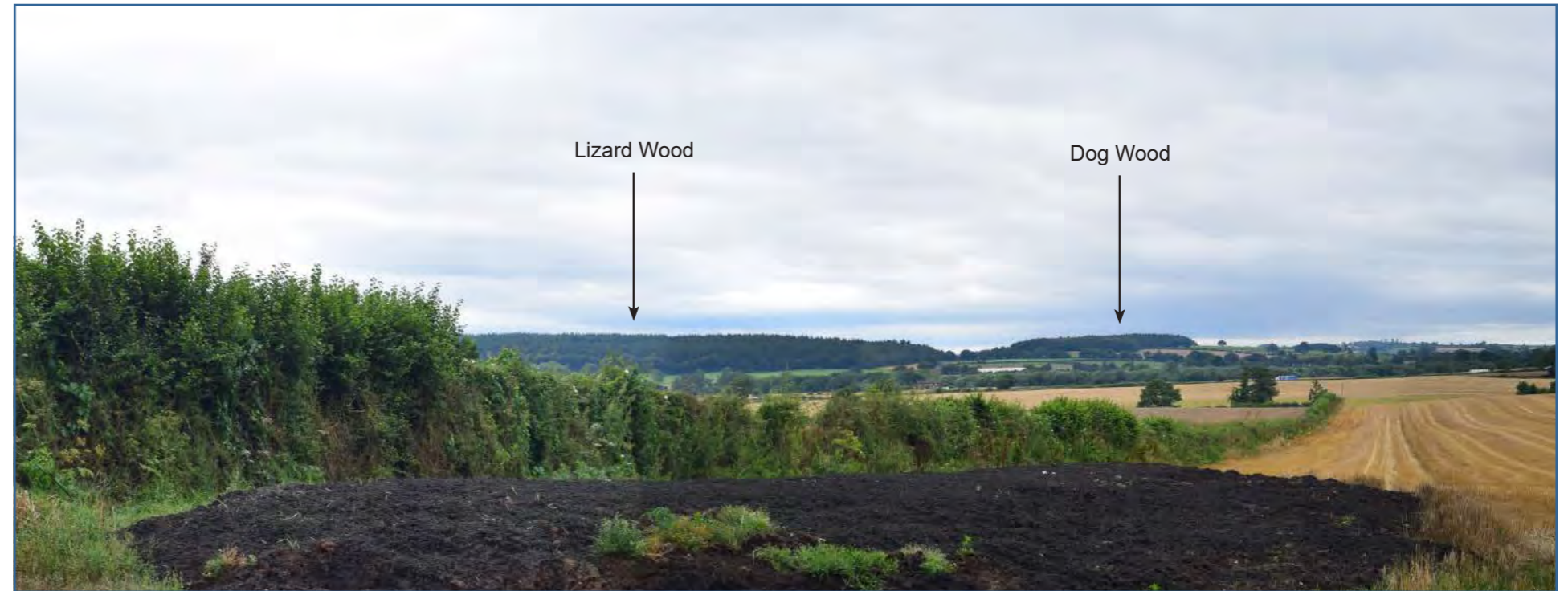
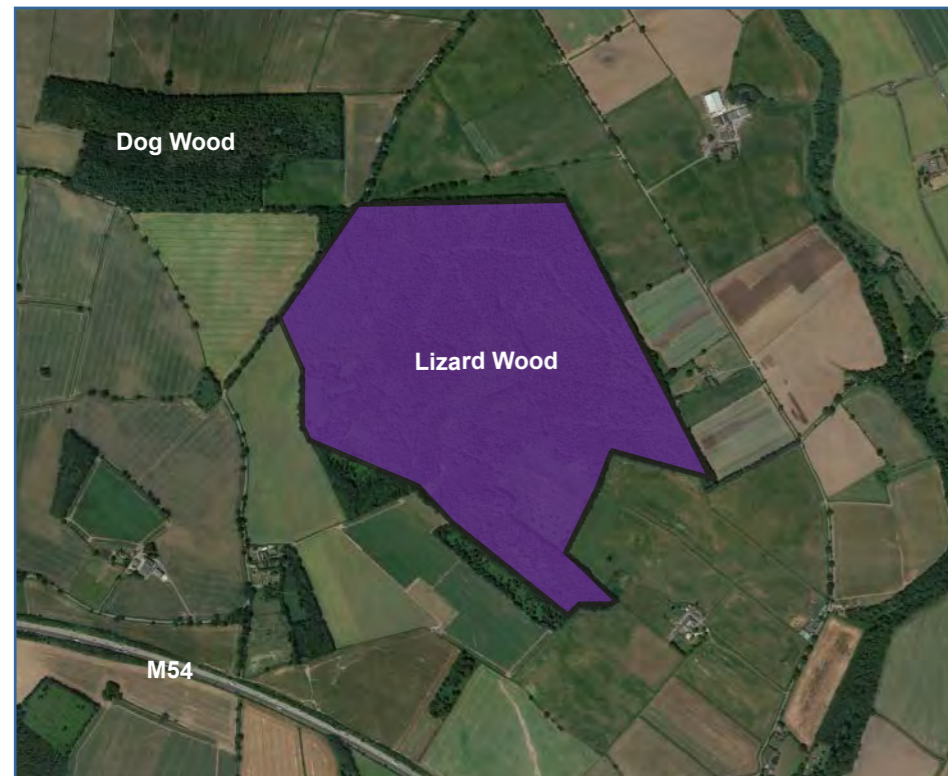


Image P11b: Lizard Wood sits on higher ground forming a prominent feature in the wider landscape.

Boundaries

- 15.1 The parcel does not lie adjacent to an existing inset area, so any Green Belt release would result in the creation of a new area inset into the Green Belt.
- 15.2 The parcel's boundaries are defined by the extents of Lizard Wood which is bordered by agricultural fields. The parcel in itself serves a robust boundary to other parcels included within this assessment and the wider Green Belt.

Harm to Green Belt Resulting from Release

Contribution of parcel to Green Belt purposes

- 15.3 The parcel makes a strong contribution to purpose 3 as it consists of uninterrupted woodland which if released from the Green Belt and developed would result in a clear visual and spatial encroachment of the countryside.
- 15.4 Other than purpose 3, the parcel does not contribute to any of the other Green Belt purposes.

Implications of the loss of openness within the parcel on the integrity of the wider Green Belt

- 15.5 The parcel contains no development and therefore contributes to the openness of the Green Belt in respect of its rural, undeveloped character. Given the contained nature of the parcel's comprising woodland, the loss of trees to development and associated infrastructure would adversely impact on visual openness. Due to the sloping topography, Lizard Wood forms a prominent feature within the landscape which creates a wooded backdrop for surrounding Green Belt land. Development of the parcel would therefore have an adverse visual impact on the wider Green Belt.

Strength of parcel boundaries

- 15.6 Although the extents of Lizard Wood are readily recognisable, the field boundaries which edge Lizard Wood would constitute as weak Green Belt boundaries.

Potential harm to the Green Belt

- 15.7 Considering the above factors and their combined relationship, judgement has been made 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 11

Potential Mitigation and Boundary Enhancements

15.8 The measures outlined below are specific to the circumstances of the parcel and could be considered as part of the development process. They are to be read alongside the Parcel 11 Mitigation and Enhancement Plan.

15.9 Due to parcel 11 consisting of only woodland planting associated with Lizard Wood, and it being intrinsically connected to the surrounding Green Belt due to its elevated topography and large degree of intervisibility, it is recommended that the parcel remains within the Green Belt for compensatory improvements.

15.10 Lizard Wood particularly serves as a distinguishable landscape asset within the wider area, offering numerous opportunities for enhancement and connectivity.

15.11 The NPPG on Green Belts as sets out:

15.12 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. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision

Parcel 11 Mitigation and Enhancement Plan



Summary

- Parcel 11 comprises woodland associated with Lizard Wood.
- The parcel makes a **Strong** contribution to Green Belt purpose 3.
- It has been assessed that the parcel's release from the Green Belt would lead to a **High** level of harm as it sits on topographically sensitive land which if developed on would have adverse visual implications on the surrounding Green Belt.
- Given the parcel's 'High' harm to Green Belt release, it is recommended that the parcel remains as part of the Green Belt with opportunities for compensatory improvements in line with the NPPG.

4 Summary and Recommendations

15.13 The finer grain analysis of the site at the Junction 3 Opportunity Area has allowed for a more detailed consideration and assessment of how smaller distinct land parcels and their performance in relation to the Green Belt purposes. The review has also identified opportunities for preserving the function of the wider Green Belt and creating robust new Green Belt boundaries.

Contribution to the Green Belt and Harm Resulting from Release

15.14 The assessment has employed the council's methodology to establish the relative performance of the Green Belt for each parcel of the site against the 5 Green Belt purposes.

15.15 A summary of how each parcel performs against the Green Belt purposes is illustrated in the table below.

	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5
Parcel 1	No Contribution	No Contribution	Strong Contribution	No Contribution	Equal Contribution
2	No Contribution	No Contribution	Strong Contribution	No Contribution	Equal Contribution
3	No Contribution	No Contribution	Moderate Contribution	No Contribution	Equal Contribution
4	No Contribution	No Contribution	Strong Contribution	No Contribution	Equal Contribution
5	No Contribution	No Contribution	Strong Contribution	No Contribution	Equal Contribution
6	No Contribution	No Contribution	Moderate Contribution	No Contribution	Equal Contribution
7	No Contribution	No Contribution	Strong Contribution	No Contribution	Equal Contribution
8	No Contribution	No Contribution	Moderate Contribution	No Contribution	Equal Contribution
9	No Contribution	Weak Contribution	Moderate Contribution	No Contribution	Equal Contribution
10	No Contribution	No Contribution	Strong Contribution	No Contribution	Equal Contribution
11	No Contribution	No Contribution	Strong Contribution	No Contribution	Equal Contribution

Strong Contribution
 Moderate Contribution
 Weak Contribution
 No Contribution
 Equal Contribution

15.16 In accordance with the methodology adopted in the council's part 2 Green Belt Review, an assessment of the potential harm of release / development has also been undertaken for each parcel. This harm assessment is based on the assumption that the openness of the whole parcel will be lost.

15.17 As outlined throughout, the factors which have informed the assessment of Green Belt harm include:

1. *The contribution across the area of potential release/development to the NPPF Green Belt Purposes,*
2. *The potential implications of the loss of openness within the area of potential release/development on the integrity of the wider Green Belt*
3. *Consistency and strength of the Green Belt boundary/urban edge in relation to the potential area of Green Belt release/development.*

15.18 A summary of each parcels 'harm' to the Green Belt resulting from release is summarised below:

Parcel 1) High - *Topographically sensitive, Relationship with Lizard Wood, Visual openness*

Parcel 2) Moderate - *Effects of development localised, Visually contained*

Parcel 3) Moderate - *Visually contained, Strong boundaries, Influenced by the A41 and associated traffic*

Parcel 4) High - *Open, Weak boundaries to the south and east, Visually connected to wider Green Belt*

Parcel 5) High - *Topographically sensitive, Strong relationship with Lizard Wood, Intervisibility with surrounding Green Belt*

Parcel 6) Moderate - *Effects of development localised, Visually contained, Existing degree of encroachment*

Parcel 7) Moderate - *Effects of development localised, Visually contained*

Parcel 8) Low-Moderate - *A41 alongside associated developments and traffic infringes on rural character, Visually contained, Strong boundaries*

Parcel 9) Moderate - *Visually contained, M54 a strong boundary which encroaches on rurality of parcel*

Parcel 10) Moderate - High - *Development would adversely impact on the historic setting and character of Tong*

Parcel 11) High - *Topographically sensitive, Distinguishable landscape feature, Lack of development and visually contained. Large degree of intervisibility with surrounding Green Belt*

15.19 The assessment of each of the parcel's potential harm to the Green Belt however does not take into consideration how they may be developed and incorporate robust new Green

Belt boundaries and opportunities and constraints to ensure sympathetic release.

Opportunities and Constraints

15.20 The recommendations alongside their opportunities and constraints plans for each of the parcels in this assessment have derived from the parcel specific circumstances, and represent an informed analysis of the landscape and visual opportunities and constraints to development.

15.21 Plan 5: Combined Opportunities and Constraints, combines the findings and recommendations for each of the parcels to demonstrate how each parcel can contribute towards a wider scheme preserving the function of the wider Green Belt and creating robust new Green Belt boundaries.

15.22 Both the parcel specific plans and combined opportunities and constraints plan identify opportunities for releasing land whilst preserving the function of the wider Green Belt and creating robust new Green boundaries.

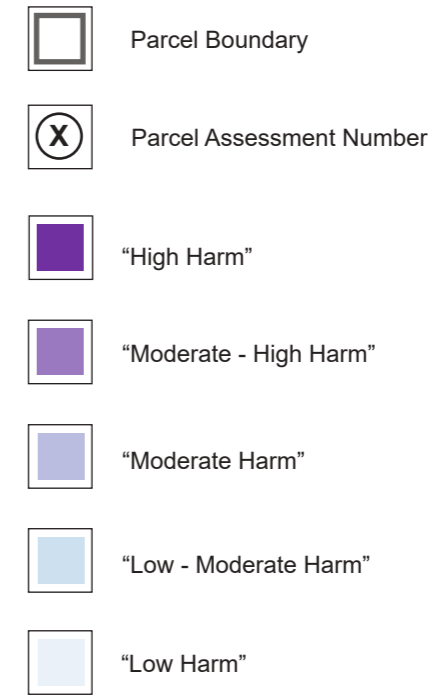
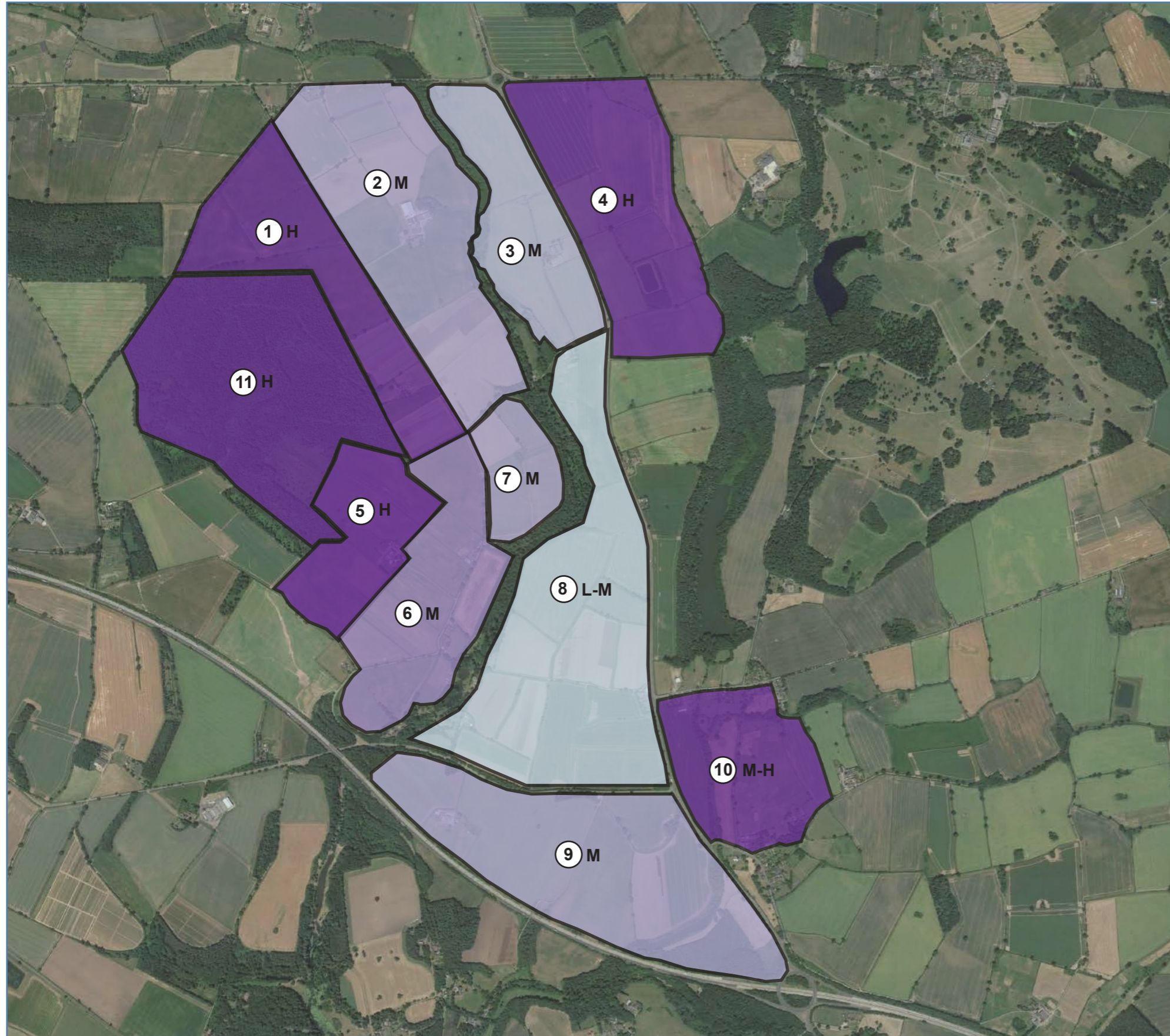
15.23 Furthermore, the recommendations present opportunities for the mitigation and enhancement of land retained in the Green Belt for access, recreation and landscape & biodiversity in accordance with the NPPG.

15.24 Deriving from the opportunities and constraints, Plan 6: **Recommended Retained and Removed Green Belt Land** illustrates the land parcels most suitable for release and those most suitable for remaining as Green Belt land with the opportunity for compensatory improvements as per NPPF requirements.

15.25 The recommendations / opportunities and constraints presented can be used to inform the development of a masterplan for the site.

4 Summary and Recommendations

Plan 4: Land Parcels Assessment of Harm_12298_P05



Project	12298_Land at J3
Drawing Title	Land Parcels Assessment of Harm
Scale	Not to Scale
Drawing No.	12298 P05
Date	August 2019
Checked	EF/RH
















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4 Summary and Recommendations

Plan 5: Combined Opportunities and Constraints Plan_11298_P06



-  Site Boundary
-  Potential Development Parcels
-  Higher Ground to be Retained and Enhanced as Undeveloped Land for Open Space
-  Opportunities to Retain and Enhance Lizard Wood as Green Belt Land for Improved Access, Biodiversity Benefits and Enhanced Landscape and Visual Amenity
-  Parcel to the East of the A41 to Remain as Green Belt Land and be Utilised as a Landscape Feature
-  Enhanced Green Belt Land Associated with Scheduled Ancient Monuments to Improve Public Access, Link to the Existing PRoW, and Provide educational links to the scheduled ancient monument
-  Opportunities to Integrate Adjacent Open Space with the Enhanced Land Associated with the Scheduled Ancient Monument
-  Parcel Between Tong and Tong Norton to the East of the A41 to be Retained as Green Belt Land and to Provide Biodiversity Benefits and Public Access Improvements to Monarchs Way, as well as Enabling the Setting of Heritage Assets to be Preserved
-  Adjacent Proposals to Respect the Character of Tong and Tong Norton
-  Retain and Enhance the Belt of Woodland Associated with the River Worfe
-  Opportunities to Enhance Vegetation Associated with the A41 and Stanton Road to help Screen and Soften Development Edge, Improve Landscape Structure, and Strengthen New Green Belt Boundary
-  Opportunity to Enhance Field Boundaries that Currently Constitute Weak Green Belt Boundaries
-  Existing Public Rights of Way/Bridleway Network to be Retained and Enhanced Whilst also Providing New Opportunities for Improved Access to Surrounding Green Belt

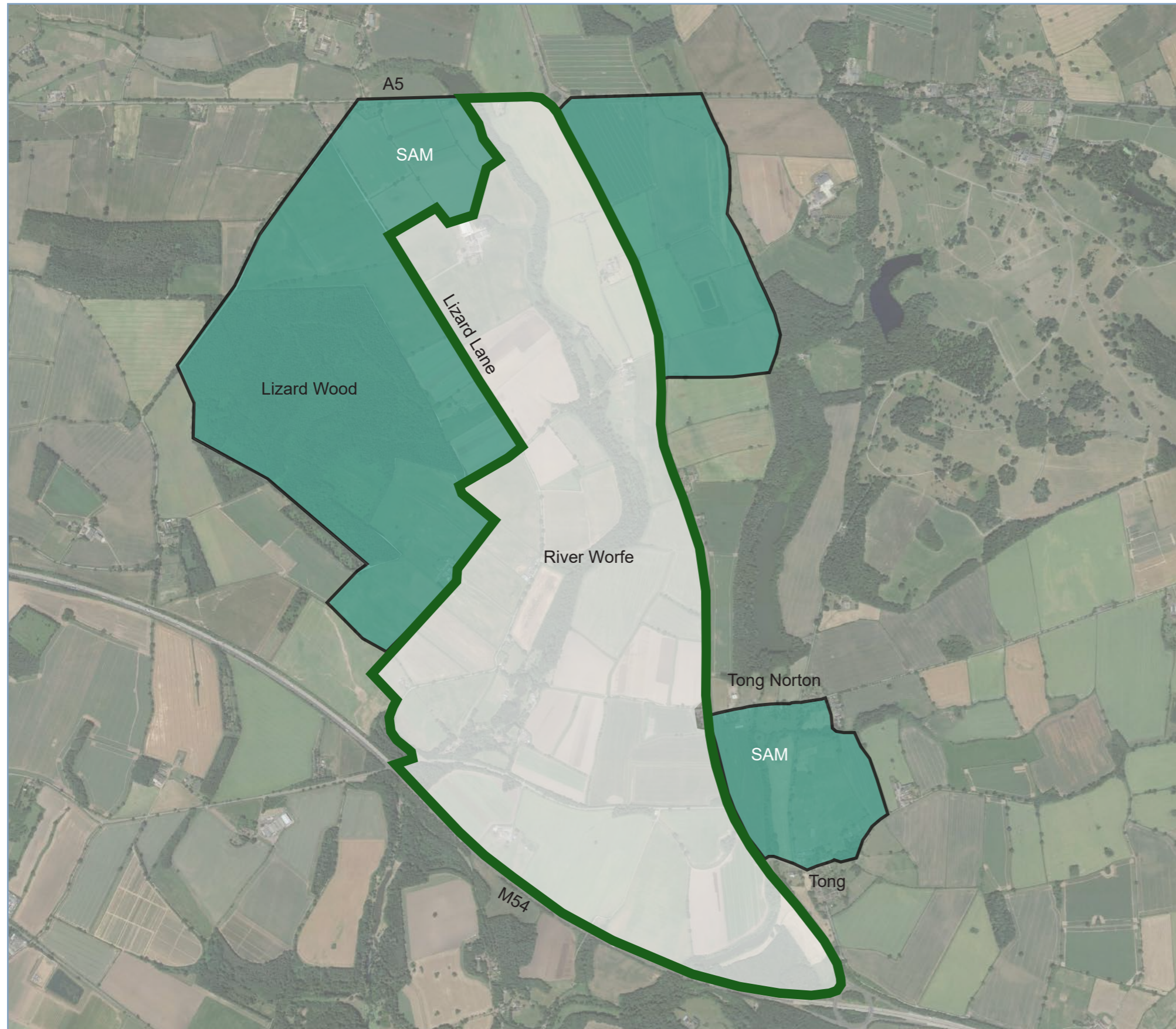
Project	12298_Land at J3
Drawing Title	Combined Opportunities and Constraints Plan
Scale	Not to Scale
Drawing No.	12298 P06
Date	August 2019
Checked	EF/RH







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4 Summary and Recommendations

Plan 6: Recommended Retained and Removed Green Belt Land_11298_P07



-  Site Boundary
-  Land Removed from the Green Belt
-  Land Retained and Enhanced within the Green Belt
-  Proposed New Green Belt Boundary

Project	12298_Land at J3
Drawing Title	Recommended Retained and Removed Green Belt Land
Scale	Not to Scale
Drawing No.	12298 P07
Date	August 2019
Checked	EF/RH



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Table 3.1: Purpose 1 Assessment Criteria

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings		e) Comments on assessment
1 To check the unrestricted sprawl of large built up areas.	a Protection of open land from urban sprawl.	Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?	Strong	Adjacent to large built-up area and land parcel contains no or very limited urban sprawl and has a strong sense of openness.	<p>Urban sprawl is the spread of urban areas into the neighbouring countryside. This could be in the form of ribbon development along the edges of roads or built development which doesn't relate well to the existing urban area.</p> <p>Parcels which have already been compromised by urban sprawl, as a result of urbanising influences, will play a weaker role than those where the Green Belt is more open in character.</p> <p>Development means any built structure but does not include pylons as these are features of both rural and urban environments and does not include development which is classed as appropriate development in the Green Belt (as defined in paras 89 and 90 of the NPPF).</p>
			Moderate	Adjacent to large built-up area and land parcel contains limited urban sprawl and has a relatively strong sense of openness.	
			Weak	Adjacent to large built-up area and land parcel already contains urban sprawl compromising the sense of openness.	
			No Contribution	Adjacent to large built-up area but land parcel makes no contribution to preventing urban sprawl.	
1	b	Does the parcel protect open land from the potential for urban sprawl to occur?	Strong	Adjacent to large built up area and land parcel has a high potential for urban sprawl to occur.	<p>The features that that are considered relevant to the assessment of potential include:</p> <p>Significant and durable boundary features - Readily recognisable and permanent features are used to define the borders of Green Belt parcels. The presence of features which contain development and prevent urban sprawl can, in certain limited locations, reduce the potential role of a Green Belt parcel in performing this purpose. The significance of a boundary in preventing urban sprawl is judged based on its relative proximity to the existing urban edge of a settlement and its nature. Only motorways, dual carriageways, railway lines and rivers which have not been breached within the relevant land parcel, or close by, are considered to constitute a very significant and durable boundary that will prevent urban sprawl.</p>
			Moderate	Adjacent to large built up area and land parcel has moderate potential for urban sprawl to occur.	

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings		e) Comments on assessment
			Weak	Adjacent to large built up area and land parcel has low potential for urban sprawl to occur.	Presence of roads – the presence of roads (apart from dual carriageways and motorways) allows for greater opportunities for urban sprawl to occur, because of the potential for ribbon development and the wider access they provide. Where such roads exist, the Green Belt is considered to play a strong role in preventing urban sprawl. These roads are distinct from those considered as boundary features as they will not form part of the existing settlement edge.
			No Contribution	Land parcel makes no contribution to preventing urban sprawl	<p>Potential for sprawl beyond the parcel boundary – in some cases a parcel may be at risk of urban sprawl within the parcel itself but there is little or no potential for sprawl to occur beyond the parcel- therefore the overall extent of the potential for urban sprawl is limited. Where this is relevant this is taken into account. (e.g. where a parcel is surrounded by existing built development on all sides, or is bounded by existing urban development and a strong a durable barrier preventing sprawl occurring beyond the parcel).</p> <p>A judgement is reached taking into account all of the above.</p>

Table 3.2 Purpose 2 Assessment Criteria

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings		e) Comments on assessment
<p>2 To prevent neighbouring towns merging into one another.</p>	<p>Reduction in visual or physical gaps between settlements.</p>	<p>Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?</p>	<p>Strong</p>	<p>The parcel plays an essential role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would cause visual or physical coalescence or substantially reduce the gap.</p>	<p>This purpose seeks to prevent settlements from merging to form larger settlements. The PAS guidance states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Two key elements are therefore used – the extent of the visual and physical gap. This may also include consideration of perceptual issues.</p> <p>The towns considered in the assessment include:</p> <ul style="list-style-type: none"> • Albrighton; • Bridgnorth; • Highley; • Codsall; • Shifnal; • Telford; • Kidderminster; • Birmingham/ Wolverhampton/ Dudley and Stourbridge.
			<p>Moderate</p>	<p>The parcel plays some role in preventing the reduction of the visual or physical distances between settlements. Loss of openness would, or would be perceived as, reducing the gap between settlements.</p>	
			<p>Weak</p>	<p>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.</p>	
			<p>No Contribution</p>	<p>Land parcel makes no contribution to preventing the merging or erosion of the visual or physical gap between settlements.</p>	

Table 3.3: Purpose 3 Assessment Criteria

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings		e) Comments on assessment
3 To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and sense of openness. ¹⁹	Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?	Strong	The land parcel contains the characteristics of countryside, has no or very little urbanising development, and is open.	Encroachment from urbanising influences is the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit. This may be from buildings within the parcel or within neighbouring parcels. Urbanising influences include any features that compromise 'openness', such as roads lined with street lighting and pavements, large areas of hard standing, floodlit sports fields, roads etc. They do not include development which is commonly found within the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches or development which is considered to be appropriate development as defined in paras 89 and 90 of the NPPF. Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.
		Has the parcel already been affected by encroachment of urbanised built development?		Moderate	
			Weak		
			No Contribution	Parcel makes no contribution to safeguarding the countryside from encroachment.	

¹⁹ The significance of existing urbanising influences has a direct influence over the relative openness of Green Belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of openness within the parcel.

Table 3.4: Purpose 4 Assessment Criteria

A) NPPF Green Belt Purposes	B) Issue(s) for consideration	C) Criteria	D) Ratings		E) Comments on assessment
<p>4 To preserve the setting and special character of historic towns.</p>	<p>Significance of historical and/or visual setting to the historic town.</p>	<p>Does the parcel contribute to the setting and 'special character' of a historic town (s)?</p>	<p>Strong</p>	<p>The parcel plays a major role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.</p>	<p>Topographic mapping, Zone of theoretical visibility (ZTV) analysis and site visits were used to inform judgements regarding intervisibility between the historic towns and their open surroundings.</p>
			<p>Moderate</p>	<p>The parcel plays a moderate role in the setting of historic towns in terms of its physical extent and degree of visibility and/or its contribution to special character.</p>	
			<p>Weak</p>	<p>The parcel plays a minor role as it lacks any direct visual relationship with historic towns, and is not visible in the context of views to it. It does however contribute in some way to the wider setting.</p>	
			<p>No Contribution</p>	<p>Parcel makes no contribution – i.e. does not form part of the setting or contribute to the special character of historic towns.</p>	



<u>Committee and Date</u>	<u>Item</u>
Cabinet 20 th July 2020	<u>Public</u>

SHROPSHIRE LOCAL PLAN REVIEW: Pre Submission Draft (Regulation 19)

Responsible Officer Mark Barrow, Executive Director Place
 e-mail: mark.barrow@shropshire.gov.uk Tel: 01743 258919

1. Summary

- 1.1 The principle purpose of this report is to seek Cabinet approval for the Pre-Submission Draft of the Shropshire Local Plan and to trigger a period of public consultation in line with Government Regulations. On a directly related issue, the report also seeks approval in principle to accept an element of unmet housing need from the Association of Black Country Authorities (ABCA), and for this housing to be incorporated into the overall housing requirement for Shropshire to 2038.
- 1.2 The purpose of the Shropshire Local Plan is to plan effectively for growth over the long term, in this case to 2038. The Plan should respond to local issues, including settlement and site specific evidence and from public consultation responses, but should also respond to national policy and guidance. As such the Plan establishes a long term housing requirement for the county to 2038, based in part on the nationally defined housing need for Shropshire, but also taking into account localised factors, in particular the need to support economic growth and to deliver more affordable and lower cost housing. Additional employment and necessary infrastructure improvements are planned alongside housing development in seeking balanced and sustainable growth.
- 1.3 The Pre-submission version of the Local Plan has been informed by four previous stages of public consultation since 2017 as part of the 'Regulation 18' stage of preparation. These stages have sought views on a range of issues including County wide growth proposals; the distribution of that growth; settlement specific strategies; proposed site allocations to guide future growth; and the inclusion of a number of 'strategic sites' on land outside recognised settlements for large-scale mixed-use development. Alongside this the Council have developed a range of evidence base documents to inform proposals.
- 1.4 The Pre-submission Draft of the Plan represents the Council's 'Regulation 19' version of the Plan. In line with national regulations the Council will seek representations through a consultation process on the Pre-Submission Draft Plan. The public and other stakeholders will be asked to make representations by considering whether the pre-submission version of the Local Plan is 'sound' based upon a set of nationally prescribed criteria. It is the intention to seek a period of eight weeks for this consultation period, which is in excess of national minimum requirements.

2. Recommendations

- A. That Cabinet approves the Pre-Submission Version of the Local Plan for a period of public consultation in order to seek representations on the soundness of the Plan;
- B. That Cabinet agrees the principle of Shropshire Council accepting up to 1,500 dwellings from the Association of Black Country Authorities (ABCA) as part of the Duty to Cooperate, and for these to be incorporated into Shropshire's overall housing requirement up to 2038 and to be distributed in accordance with the overall Strategic Approach to the distribution of growth.
- C. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitat Regulation Assessment and the Consultation Strategy.

REPORT

3. Risk Assessment and Opportunities Appraisal

- 3.1 The current Local Plan Review is designed to help ensure that the Local Plan remains the starting point and platform for planning decisions during the period to 2038. Local Planning Authorities should ensure they have an up-to-date Local Plan and for this process to enable an ongoing housing land supply sufficient to accommodate at least five years' worth of the area's housing requirement. Whilst the Council's current Core Strategy and SAMDev Plans (combined equating to the Local Plan for the area) are considered up-to-date, there is a risk that should the Local Plan not be reviewed in an appropriate timescale, the ongoing ability for the Council to manage growth in a plan-led manner will be weakened.
- 3.2 The pre-submission version of the Local Plan is a statutory stage of plan making and should represent an advanced and fully formed version of the Plan. This is the first occasion the emerging Local Plan has been published and consulted on in its full format, incorporating the various elements of previous stages of consultation into a single document. The four previous stages of consultation (listed in para 1.3) were part of the more informal Regulation 18 stage of preparation and focussed on specific issues. These stages have allowed the Council to respond where necessary to consultation responses and additional evidence, and to develop the Local Plan into the Pre-Submission version.

- 3.3 If agreed, the Council will consult on the Pre-Submission Draft version of the Local Plan in summer 2020. In accordance with most up-to-date plan preparation timetable, agreed in April 2020 in light of the Covid 19 national emergency, it is proposed to seek Full Council approval to submit the Local Plan to the Secretary of State in December 2020 for Independent Examination. It is anticipated the Examination process will last at least 12 months, and it is therefore hoped to move to adoption of the Local Plan in early 2022, subject to a successful Examination process.
- 3.4 It is considered the significant amount of consultation carried out thus far has helped to inform the plan's preparation in a meaningful and constructive manner and reduced the risk to the Council of a challenge on the Plan's soundness on these grounds. However, given the high level of interest in the Plan and the nature of the issues it deals with, it is considered there is a significant likelihood the consultation on the pre-submission version of the Plan will generate a significant level of response. This should not be considered a risk in its own right, and indeed ensuring the public and other stakeholders have a meaningful opportunity to comment on the plan is essential to its 'soundness'. Instead the risk lies in the resource implications of a high response level, and the resulting consequences on plan preparation timetable. There is little to mitigate this risk.
- 3.5 The key purpose of the Regulation 19 consultation stage is to allow consultees the opportunity to make representations on the 'soundness' of the Local Plan. All representations made will be considered by a Planning Inspector appointed to independently examine the Local Plan, currently scheduled to take place in 2021. Ahead of the submission of the Local Plan for examination, scheduled for January 2021, the Council's ability to respond to representations made through the consultation is more limited than at the Regulation 18 consultation stages. Indeed, whilst the Council will be able to agree minor modifications to the Local Plan ahead of its Submission to the Secretary of State this does not extend to making more significant changes, such as the inclusion of an additional site allocation.
- 3.6 However, if, through the Regulation 19 consultation process, it is decided there is a need for the Council to make a significant change to the Plan, the Council does have the ability to propose these changes as long as these are subject to a period of consultation through a further Regulation 19 consultation exercise. Again the risk to the Council in this scenario is one of timeframe, and a new Local Development Scheme (LDS) setting out the Local Plan preparation timetable would need to be agreed. The extensive consultation the Council has carried out at the Regulation 18 stages has mitigated this risk, but it should be recognised that there is always the possibility of new evidence being presented through the Regulation 19 process which could lead to a need to propose a more significant alteration to the Plan.

4. Financial Implications

- 4.1 Planned growth provides the best possible opportunity for Shropshire Council to harness growth potential by providing a stable platform for investors and developers. Growth also provides an opportunity to secure contributions to help maintain and improve local facilities, services and infrastructure. New growth simultaneously imposes an additional burden on local services and

provides opportunities to secure investment to improve local facilities which are the responsibility of Shropshire Council and other public service providers.

- 4.2 The Local Plan process is subject to a number of costs, both during preparation principally due to the need to commission evidence base documents to inform both site allocations and development management policies, and through the Examination process, principally through the cost of the Planning Inspectorate. These costs are both necessary and unavoidable in the pursuit of a 'sound' Plan.
- 4.3 Equally there is a financial risk to the Council of not pursuing a review of the Local Plan in a timely manner, most notably through the likelihood of increased levels of planning appeals as a result of increased challenges to the integrity of the currently adopted Core Strategy and SAMDev plan.

5 Background

- 5.1 The National Planning Policy Framework (NPPF) confirms that the planning system should be genuinely plan-led, and that up-to-date Plans should provide a positive vision for the area; a framework for addressing housing need and other economic, social and environmental priorities. The NPPF also states that Plans should be a platform for local people to shape their surroundings.
- 5.2 Whilst Shropshire currently has an up-to-date Local Plan through the adopted Core Strategy and SAMDev documents, there is clearly a significant onus on authorities to regularly update these plans in order to keep them up-to-date. The need for an early review of the Local Plan was also a requirement of the SAMDev Inspector's Report in 2015. However, it should equally be recognised that Plan making does take time; an inevitable consequence of necessary and constructive community engagement, and the need for policies and proposals to be supported by robust evidence. With this in mind, the Council began an early review of the Local plan in 2017, with the Pre-Submission draft (Appendix 1) being the consolidated outcome of this process.
- 5.3 The Pre-Submission version of the Local Plan contains the following broad elements:
- Strategic approach to growth and distribution of development;
 - Localised Strategies for individual settlements;
 - Strategic Sites;
 - Development Management policies to guide all development

Strategic approach to growth and distribution of development

- 5.4 Policy SP2 of the Pre-Submission Draft of the Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares of employment land, equating to around 1,400 dwellings and 15ha of employment land per annum. This represents a marginally lower growth level than that proposed in the

Preferred Scale and Distribution of Growth consultation carried out in early 2018, and is broadly in line with past rates of growth seen in the County.

- 5.5 This level of housing growth proposed across the 22 years covered by the Plan Period seeks to respond in the first instance to the most up-to-date calculation of housing need in the County as a basis, currently 25,894 dwellings over the Plan Period, and then accommodates an additional uplift in this capacity in order to respond positively to the overall 'high growth' strategy. It is considered this uplift will further support the delivery of family and affordable housing to support local needs; increase the opportunity for specialist housing and the needs of other groups; support the diversification of the workforce; support greater opportunities to support the Council's wider economic growth aspirations; and support the opportunity for the Council to respond positively to appropriate cross boundary needs.
- 5.6 The approach to distribution of development reflects the Council's previously stated preferred option, favouring an 'urban focussed' approach. It is considered that by virtue of the infrastructure and services Shropshire's largest settlements generally provide, there is a greater opportunity to deliver larger scale mixed use schemes, in doing so providing better conditions to support additional employment delivery and providing a better balance of growth.
- 5.7 It is a requirement of Local Planning Authorities to undertake a duty to cooperate with neighbouring and closely related Local Planning Authority areas. Council officers have been engaged in discussions with these areas over the course of the plan preparation process. Ahead of the proposed submission of the Local Plan in January 2021, a series of Statements of Common Ground will be prepared and agreed with these areas.
- 5.8 Based upon the discussions to this point the only cross boundary issue requiring recognition and intervention in the Local Plan is with the Association of Black Country Authorities (ABCA) as part of the ongoing preparation of their Black Country Local Plan. The issue relates to the lack of capacity in the ABCA area to accommodate all their defined housing and employment needs in their area in a sustainable manner. This has resulted in ongoing discussions and agreement with a number of surrounding Planning Authority areas to accommodate varying amounts of this unmet need.
- 5.9 Effective and on-going joint working between strategic policy-making authorities is an important part of plan-making as part of the Duty to Cooperate. With this in mind, and further to discussions with the Black Country Authorities, it is proposed that the Shropshire housing requirement of 30,800 dwellings incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, resulting from constraints to their housing supply opportunities to 2038. It is considered this offer responds positively and constructively to the needs of ABCA, an area with close links to Shropshire, and provides an opportunity for Shropshire Council to accommodate this need as part of its overall housing requirement, and to distribute this need in line with its agreed pattern of development outlined in Policy SP2 of the Local Plan.

Localised Strategies for individual settlements

- 5.10 In following the urban focussed approach the majority of the County's growth is captured in settlement specific strategies for Shropshire's network of Market Towns. For the majority of areas this includes proposed site allocations and guidelines on how development on these sites will be managed. It should be remembered that whilst the allocation of a site provides an 'in principle' support that development in this location can be supported, these will continue to be subject to the grant of future planning approval. Where local communities are currently preparing Neighbourhood Plans this has been reflected within the proposed strategies.
- 5.11 Whilst the focus of the plan is on the urban area, it continues to be important to plan effectively for Shropshire's rural areas, but in doing so recognising that growth opportunities in these areas should be more closely aligned with the ability of villages to provide a standard of services and facilities. For this reason the Council opted early in the plan preparation process to provide a consistent methodology to the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The conclusions of this process are included in schedule SP2.2 of the Pre-Submission Draft Plan, which identifies those areas which are proposed to act as Community Hubs. Policy SP7, along with individual Settlement specific policies, seeks to provide a framework for how development will be managed in these areas effectively and in keeping with the local character.

Strategic Sites

- 5.12 The Pre-Submission version of the Local Plan proposes to allocate three strategic settlements/sites at the following locations:
- The Former Ironbridge Power Station which will form a new strategic settlement;
 - Clive Barracks, Tern Hill which will form a new strategic settlement; and
 - RAF Cosford which will facilitate MOD use and associated activities

Former Ironbridge Power Station

- 5.13 The former Ironbridge power station occupies a 350 acre site south of the River Severn near Buildwas. The power station ceased operation in 2015 and was purchased by Harworth Group in 2017 with a view to regenerating the site. The proposed inclusion of the site for inclusion within the Local Plan was consulted on as a preferred option in summer 2019. An outline planning application was subsequently submitted to the Council in December 2019 for a major mixed use development including 1,000 dwellings. Whilst the planning application is yet to be determined, it remains appropriate for the Council to continue to seek the site's inclusion within the Local Plan. It is expected that subject to the grant of planning approval, the site will be fully developed by the end of the plan period. The proposed development guidelines for the site are included in Policy S20 of the Pre-Submission Draft Local Plan

Clive Barracks, Tern Hill

- 5.14 Clive Barracks is a 50 hectare military site on the A41 near Market Drayton which is currently home to the Royal Irish Regiment. MOD announced the intention to redevelop the site in March 2016, and have subsequently confirmed they now plan to complete the vacation and disposal of the site by 2025. The proposed inclusion of the site for inclusion within the Local Plan to form a significant mixed use proposal was consulted on as a preferred option in summer 2019. Local engagement on the site up to this point has helped to shape the proposed development guidelines for the site, which is proposed to provide employment land and around 750 homes as part of a new settlement, together with local services and facilities. Given the timeframe of the proposed disposal of the site, it is expected that around 600 homes will be delivered during the plan period to 2038. The proposed development guidelines for the site are included in Policy S19 of the Pre-Submission Draft Local Plan.

RAF Cosford

- 5.15 The national defence review has confirmed RAF Cosford as a key Ministry of Defence asset, but it is considered the potential for the area to meet its future operational defence requirements is restricted by its Green Belt location. Having considered the impact on national Green Belt objectives, as well as the benefits of doing so, it is considered there are exceptional circumstances for the site to be released from the Green Belt. In summary the strategic site will build upon its existing role as a centre of excellence for both UK and International Defence Training, host a specialist aviation academy, support opportunities to co-locate other Ministry of Defence units and activities, facilitate the intensification and expansion of the RAF Museum Cosford and allow the formation of a new headquarters for the Midland Air Ambulance Charity. The proposed development guidelines for the site are included in Policy S21 of the Pre-Submission Draft Local Plan

Other Strategic Site Considerations

- 5.16 As part of the Strategic Sites consultation in summer 2019 the Council confirmed it was considering the potential inclusion of land north of Junction 3 on the M54 within the Local Plan. The land, which covers around 400 hectares and lies wholly within the Green Belt, is being actively promoted to include around 3,000 dwellings and 50ha of employment land, as well as the inclusion of local facilities and services. Whilst the Strategic Sites consultation in 2019 clearly established the site was not at that stage preferred for development, given the scale of the proposal the Council nevertheless considered it was important to seek community views.
- 5.17 In weighing up the site specific considerations, both positive and negative, and giving consideration to the consultation responses on this matter, it is considered there is insufficient justification to progress an exceptional circumstances argument for the release of this land from the Green Belt. The site is therefore not included within the Pre-Submission version of the Local Plan.

Green Belt Release

- 5.18 Green Belt is perhaps one of the most widely known designations in the planning system. Green Belts cover parts of many local authority areas; in Shropshire's case significant areas in the east of the County are covered by the West Midlands Green Belt designation. The key purposes of the designation is to check unrestricted sprawl; prevent neighbouring towns merging; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration.
- 5.19 Permanence is a key feature of Green Belt boundaries, and their extent should only be altered where exceptional circumstances apply. It is however, appropriate for Local Plans to review Green Belt boundaries when required, and in Shropshire's case this was prompted in 2015 by the conclusions of the SAMDev Inspector's Report, which instructed that a review of Shropshire's Green Belt be carried out as part the Local Plan review process. To this end, in 2017 the Council commissioned a Green Belt Assessment in order to assess the extent to which the land within the Green Belt in Shropshire performs against the purposes of Green Belts (outlined in para 5.18). This was followed in 2018 by the publication of a Green Belt Review, which provides an assessment of the harm to the Green Belt purposes should particular parts of the Green Belt be released. The Council therefore have a comprehensive evidence base with which to support decision taking.
- 5.20 It is important to note that before seeking to release land from the Green Belt, the NPPF places a clear need for the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to accommodating the needs of RAF Cosford, and having considered local circumstances of need, the Pre-Submission version of the Local Plan proposes the removal of land from the Green Belt for allocations for employment development within the plan period to 2038 in Shifnal and Bridgnorth, and for mixed use and housing development in Alveley. The Draft Plan also seeks the removal of land from Green Belt for to act as 'safeguarded land' for potential development beyond the plan period in Albrighton, Shifnal and Alveley.
- 5.21 The council are aware there has been a particular focus recently on development options at Bridgnorth, which acts as Shropshire's third largest settlement but which is constrained by Green Belt on its eastern side. In 2018 as part of the Preferred Sites consultation the Council proposed the allocation of land at Stanmore, within the Green Belt, for a new mixed use Garden Village in order to meet the growth requirement for the town within the plan period. Whilst a full exceptional circumstances argument was not advanced at this point, it was felt this option represented a sustainable option for the town, in part given the lack of reasonable alternatives available being presented in non-Green Belt locations. It is acknowledged there was a significant level of opposition to this proposal expressed through the preferred options consultation process.
- 5.22 In March 2020, the Council became aware of a new major development option for the town being presented by Taylor Wimpey. This proposed the inclusion of land to the south of the A458, which falls principally in the Tasley parish area, for the creation of an alternative Garden Village of a similar scale

and nature to the Stanmore proposal. This land is not within the Green Belt. This has been a significant new consideration in the process. In meeting the policy requirements of the NPPF concerning the release of Green Belt, it has been necessary for officers to reassess the continued suitability of the Stanmore proposal. This further site assessment process will be included in the evidence base material upon publication of the Pre-Submission draft for consultation, but in advance of this Appendix 2 of this report specifically sets out the officer considerations and conclusions on this issue.

- 5.23 In summary, having considered the competing site proposals against a full range of material issues, it is recommended that the Tasley Garden Village proposal should be preferred for development to support a comprehensively planned mixed use development to meet the housing needs of Bridgnorth over the plan period. Conversely, it is now recommended that the majority of the Stanmore proposal should remain designated as Green Belt and should not be identified for future development. The exception to this is land north and west of the existing Stanmore Industrial Park, where it continues to be considered the release of land from the Green Belt would be beneficial in supporting the future expansion needs of the Industrial Park to meet employment requirements.
- 5.24 It is acknowledged this is a significant change of position from that proposed in the Preferred Options document in November 2018. However, it remains necessary for the Council to be responsive to new evidence and site promotions throughout the plan making process. In this instance, the impact on the objectives of the Green Belt is a significant policy consideration which has been taken into account, but equally the wider site assessment process leads to the conclusion that the Tasley Garden Village is capable of delivering a sustainable mixed use scheme. Whilst it is acknowledged Taylor Wimpey have carried out localised engagement on the proposal during May and June, the community will have the opportunity through the Regulation 19 consultation process to have their say on the soundness of the Plan to Shropshire Council.

Strategic and Development Management Policies to Guide New Development

- 5.25 The NPPF states that Local Plans should contain policies that are clearly written and unambiguous, and that a development plan must include strategic policies to address an area's priorities for the development and use of land in its area. A local Plan can also include a series of non-strategic (or detailed) policies to address other more specific issues.
- 5.26 The Pre-Submission version of the Local Plan contains 35 Strategic and Development Management policies, covering a wide spectrum of issues and considerations relevant to the pursuit of sustainable development including climate change; supporting high quality design; managing development in the countryside; delivering affordable housing; ensuring a suitable mix of tenures in new residential development; and managing and minimising flood risk. When adopted these policies will replace the current development management policies in the Core Strategy and the SAMDev Plan.

- 5.27 Whilst the Local Plan should be the starting point for taking decisions on planning applications it does not sit in isolation. To this end many of the proposed development management policies make reference to other strategies being prepared by the Council, including the adopted Economic Growth Strategy 2017-2021, and the emerging Housing and Climate Change Strategies. In doing so these strategies will be a material factor in decision making.

6 Next steps

- 6.1 Subject to Cabinet approval, the Pre-Submission Draft of the Local Plan, along with the associated documents will be published for consultation for a period of eight weeks. It is proposed this consultation will begin on Monday 3rd August and run until Wednesday 30th September, subject to the considerations outlined in para 6.2. Throughout the plan preparation process officers have sought to engage constructively with communities, Parish and Town councils, and elected representatives on emerging preferred options. Whilst in many cases this has led to a consensus of opinion on issues, it is recognised there remains areas where there is likely to be opposition to proposals and that in some areas elected representatives have voiced their objections to proposals included within the Pre-Submission Draft Plan. The statutory consultation process is an opportunity for communities, Parish and Town Councils and elected representatives to submit their comments on the soundness of the Plan, and these will be considered ahead of the proposed submission of the Local Plan to Government for examination in January 2021.
- 6.2 The Consultation on the Pre-Submission Draft of the Local Plan must meet the Town and Country Planning (Local Planning) (England) Regulations 2012, as a minimum. For clarity this means the Pre-Submission Draft of the Local Plan must be made available for inspection at the Council's principal office (in this case Shirehall) and at such other places within the authority area as the Council consider appropriate, which has in previous stages of consultation been libraries. It is acknowledged that due to the Covid 19 national emergency there have been restrictions placed on public access into Council premises, and it is recognised that this will need to be addressed as a matter of priority before the consultation can begin. Consultation arrangements must also meet the requirements of the Council's Statement of Community Involvement (SCI). A significant number of organisations and individuals will continue to be notified directly of the publication of the consultation documents in accordance with the SCI. Electronic responses are encouraged to reduce printing and distribution costs and to reduce the time spent collating and analysing paper responses.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Cabinet Member (Portfolio Holder)

Robert Macey, Portfolio Holder for Housing and Strategic Planning

Local Members

Appendices

1. Shropshire Local Plan 2016-2038: Pre-Submission Draft Local Plan plus associated mapping
2. Assessment of Garden Village Proposals in Bridgnorth



<u>Committee and Date</u>
Cabinet 7 th December 2020

<u>Item</u>
<u>Public</u>

SHROPSHIRE LOCAL PLAN REVIEW: Pre Submission Draft (Regulation 19)

Responsible Officer Mark Barrow, Executive Director Place
 e-mail: mark.barrow@shropshire.gov.uk Tel: 01743 258919

1. Summary

- 1.1 The principle purpose of this report is to seek Cabinet approval for the Pre-Submission Draft of the Shropshire Local Plan and to trigger a period of public consultation in line with Government Regulations. This is referred to as Regulation 19 stage of Plan preparation, and signifies the point in the process where the Council has concluded its earlier consultations under Regulation 18, which in Shropshire's case has included five separate public consultation stages.
- 1.2 On a directly related issue, the report also seeks approval in principle to accept an element of unmet employment land need from the Association of Black Country Authorities (ABCA), and for this employment need to be incorporated into the overall employment requirement for Shropshire to 2038. This follows on from Cabinet's decision in July 2020 to accept the principal of Shropshire Council to accept up to 1,500 dwellings from ABCA's identified housing need and represents an important aspect of the ongoing Duty to Cooperate legal process.
- 1.3 The Cabinet paper also seeks approval of an amended timeframe for the production of the Local Plan, which must be set out in the Local Development Scheme (LDS). In order for a Local Plan to be 'legally compliant' it must be produced in accordance with the timeframe set out in the LDS – hence the need to amend it. This has been necessary in order for the Council to give meaningful consideration to the responses made to the public consultation on the Regulation 18 Pre-Submission Draft version of the Plan.
- 1.4 The purpose of the Shropshire Local Plan is to plan effectively for growth over the long term, in this case to 2038. The Plan should respond to local issues, including settlement and site specific evidence and from public consultation responses, but should also have full regard to national planning policy and guidance. As such the Plan establishes a long term housing requirement for the county to 2038, based in part on the nationally set methodology, but also taking into account localised factors, in particular the need to support economic growth and to deliver more affordable and lower cost housing.
- 1.5 The Local Plan seeks to set an appropriate and 'sound' strategy for the County. It is the role of the Regulation 19 stage of consultation to seek

representations on the 'soundness' of the Plan based on a number of specified criteria in the National Planning Policy Framework.

1.6 The 'Regulation 19' Pre-submission version of the Local Plan has been informed by the following five previous stages of public consultation as part of the 'Regulation 18' stage of preparation:

- Issues and Strategic Options (January 2017);
- Preferred Scale and Distribution of Growth (November 2017);
- Preferred Site Allocations (November 2018);
- Strategic Sites (June 2019);
- Draft Pre-Submission Local Plan (August 2020)

These stages have sought views on a range of issues including County wide growth proposals; the distribution of that growth; settlement specific strategies; proposed site allocations to guide future growth; the inclusion of a number of 'strategic sites' on land outside recognised settlements for large-scale mixed-use development; and a range of strategic and development management policies with which to effectively manage development. Alongside this the Council have developed a range of evidence base documents to inform proposals and policies.

1.7 In line with national regulations the Council will seek representations through a consultation process on the Regulation 19 Pre-Submission Draft Plan. The public and other stakeholders will be asked to make representations by considering whether the pre-submission version of the Local Plan is 'sound' based upon a set of nationally prescribed criteria. It is the intention to seek a period of seven weeks for this consultation period, which is in excess of national minimum requirements.

2. Recommendations

- A. That Cabinet approves the Pre-Submission Version (Regulation 19) of the Local Plan (Appendix 1) for public consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of seven weeks;
- B. That Cabinet agrees the principle for Shropshire Council to accept up to 30 hectares of employment need from the Association of Black Country Authorities (ABCA) as part of the legal Duty to Cooperate process, in order to supplement the acceptance of up to 1,500 dwellings from ABCA to 2038 (previously agreed in principle), and for this employment provision to be distributed in accordance with draft policy SP2 of the draft Local Plan.
- C. That Cabinet approves an updated version of the Local Development Scheme (Appendix 3)

- D. That authority is delegated to the Executive Director of Place in consultation with the Portfolio Holder for Housing and Strategic Planning Development to make additional minor editorial changes to the Pre-submission Version of the Local Plan ahead of its publication for public consultation, and to agree associated documents for publication, including the Sustainability Appraisal, Habitats Regulation Assessment and the Consultation Strategy.

REPORT

3. Risk Assessment and Opportunities Appraisal

- 3.1 A key purpose of the Local Plan is to provide an appropriate strategy to enable an area to grow in a sustainable manner to meet the need for development. The Local Plan is the starting point for taking planning decisions. In recent years the importance of having an up-to-date Local Plan has been amplified by the need for Local Authorities to show a sufficient (at least five years) supply of housing land. Indeed Shropshire has seen first-hand the impact of not having a sufficient housing land supply where some planning decisions are made in an ad hoc manner where Local Plan policies are afforded less weight in decision making.
- 3.2 The most effective way to ensure the Council maintains a sufficient level of housing supply is to keep its Local Plan up-to-date. Whilst the Council's current Core Strategy and SAMDev Plans (combined equating to the Local Plan for the area) are currently considered up-to-date, there is a risk that should the Local Plan not be reviewed in an appropriate timescale, the ongoing ability for the Council to manage growth in a plan-led manner will be compromised.
- 3.3 The pre-submission version of the Local Plan (Appendix 1) is a statutory stage of plan making and represents a very advanced and fully formed version of the Local Plan. It signals the end of the Council's detailed and robust 'Regulation 18' stage of plan making and the transition into the more formal 'Regulation 19' stage. Indeed, since 2017 the Plan has been subject to five separate stages of public consultation. Most recently, between August and September, the Council published and consulted on a full Draft Local Plan as part of the Regulation 18 stage, and Section 5 of this report will provide more detail on the outcomes of this important consultation.
- 3.4 It is considered the Council's approach to consultation has allowed the public and other stakeholders to have a significant opportunity to input into the process and, where appropriate, to shape the emerging Local Plan's proposals. Importantly however, consultation in this context does not mean that a consensus of opinion has been reached in all cases, and it is appropriate to recognise there remains opposing views to some elements of the Local Plan locally, either from residents, local parish and town councils, site promoters or all three. It is the role of the Local Plan's consultation process to allow for these views to be made, and for the Council to respond and reflect upon them, especially if they are advancing material considerations. It is considered the thorough process the Council has engaged in over the last few years, which has followed the requirements of

legislation and the Council's own Statement of Community Involvement (SCI), has allowed this to happen in an effective and meaningful manner.

- 3.5 The Regulation 19 Pre-Submission Draft is the second occasion where the emerging Local Plan has been published and consulted on in a full format. The five previous stages of consultation (listed in para 1.6) were part of the preliminary Regulation 18 stage of preparation; the first four consultations between 2017 and 2019 focussing on specific parts of the process, whilst the fifth stage bringing these elements together with the inclusion of a full set of draft strategic and development management policies.
- 3.6 If agreed, the proposal is to consult on the on the 'Pre-Submission Draft' version of the Local Plan at Regulation 19 for seven weeks between mid-December and the end of January 2021. The updated version of the Local Development Scheme (LDS), included to this report as Appendix 3, recommends a new timetable for the Local Plan. This takes into account the recommendation to consult for a period of seven weeks on the Pre-Submission Local Plan, and charts a realistic timetable to the Submission of the Local Plan to the Government for Examination in April 2021. It should be noted that the proposed seven week period of consultation at Regulation 19 exceeds the statutory minimum requirements and takes into account that the proposed consultation includes the Christmas period. Once submitted, the revised LDS anticipates an Examination process of around 12 months, and it is therefore hoped to move to adoption of the Local Plan in May 2022, subject to a successful Examination process.
- 3.7 The key purpose of the Regulation 19 consultation stage is to allow consultees the opportunity to make representations on the 'soundness' of the Local Plan. All representations made will be considered by a Planning Inspector appointed to independently examine the Local Plan, currently scheduled to take place in 2021. Ahead of the submission of the Local Plan for examination, the Council's ability to respond to representations made through the consultation is more limited than at the Regulation 18 consultation stages. Indeed, whilst the Council will be able to agree minor modifications to the Local Plan ahead of its Submission to the Secretary of State this does not extend to making more significant changes, such as the inclusion of an additional site allocation.
- 3.8 However, if, through the Regulation 19 consultation process, it is decided there is a need for the Council to make a significant change to the Plan, the Council does have the ability to propose these changes as long as these are subject to a period of consultation through a further Regulation 19 consultation exercise. Again, the risk to the Council in this scenario is one of timeframe, and a new Local Development Scheme (LDS) setting out the Local Plan preparation timetable would need to be agreed. The extensive consultation the Council has carried out at the Regulation 18 stages has mitigated this risk, but it should be recognised that there is always the possibility of new evidence being presented through the Regulation 19 process which could lead to a need to propose a more significant alteration to the Plan.

4. Financial Implications

- 4.1 Planned growth provides the best possible opportunity for Shropshire Council to harness growth potential by providing a stable platform for investors and developers (from both the public and private sectors). Growth also provides an opportunity to secure contributions to help maintain and improve local facilities, services and infrastructure. New growth simultaneously imposes an additional burden on local services and provides opportunities to secure investment to improve local facilities which are the responsibility of Shropshire Council and other public service providers.
- 4.2 The Local Plan process is subject to a number of costs, both during preparation principally due to the need to commission evidence base documents to inform both site allocations and development management policies, and through the Examination process, principally through the cost of the Planning Inspectorate. This expenditure is both necessary and unavoidable in the pursuit of a 'sound' Plan.
- 4.3 Equally there is a financial risk to the Council of not pursuing a review of the Local Plan in a timely manner, most notably through the likelihood of increased levels of planning appeals as a result of increased challenges to the integrity of the currently adopted Core Strategy and SAMDev plan.

5 Background

- 5.1 The National Planning Policy Framework (NPPF) confirms that the planning system should be genuinely plan-led, and that up-to-date Plans should provide a positive vision for the area; a framework for addressing housing need and other economic, social and environmental priorities. The NPPF also states that Plans should be a platform for local people to shape their surroundings. This important principle is also central to the recent proposed changes to the Planning system as part of the Government's Planning White Paper.
- 5.2 Whilst Shropshire currently has an up-to-date Local Plan through the adopted Core Strategy and SAMDev documents, there is clearly a significant onus on authorities to regularly update these plans in order to keep them up-to-date. The need for an early review of the Local Plan was also a requirement of the SAMDev Inspector's Report in 2015. However, it should equally be recognised that Plan making does take time; an inevitable consequence of necessary and constructive community engagement, and the need for policies and proposals to be supported by robust evidence. With this in mind, the Council began an early review of the Local Plan in 2017, with the Pre-Submission draft (Appendix 1) being the consolidated outcome of this process.
- 5.3 In July 2020 Cabinet agreed to consult on a full Draft version of the Local Plan. Broadly this plan contained the following sections:
- Strategic approach to growth and distribution of development;
 - Strategic Policies
 - Development Management policies
 - Localised Strategies for individual settlements;

- Policies for new Strategic Sites and Settlements;

Feedback from the Draft Local Plan consultation (August-September 2020)

- 5.4 The recent consultation on the Draft Local Plan at Regulation 18 allowed the Council to consult on a full version of the Local Plan for the first time, and to consider responses, before moving to the formal Regulation 19 stage. The consultation process, which spanned for eight weeks between August and September, led to responses from around 2,500 consultees, including from statutory organisations, local organisations, parish and town councils, local residents and site promoters. This is a significant response rate, and officers have reflected upon these responses in moving the Plan forward. Indeed, it should be noted that due to the high response rate, officers have required a further two weeks to consider responses than first assumed, leading to the change in date of Cabinet. A full summary of the consultation responses will be made available as part of the consultation into the Regulation 19 Pre-Submission Plan.

Changes incorporated into the Regulation 19 Pre-Submission Local Plan

- 5.5 Officers have reviewed and considered the comments made, alongside any other material issues not previously considered. Revisions are now suggested and have been incorporated into the Regulation 19 version included as Appendix 1 to this report. A detailed summary of all the consultation responses is included as Appendix 4 to this report.
- 5.6 None of the suggested changes alter the core strategic approach to the Plan. There are no changes proposed to the overall levels of local housing and employment growth over the plan period; the approach to the distribution of growth across the County through a settlement hierarchy; and the identification of Community Hubs in the rural area.
- 5.7 The vast majority of the changes which are now proposed relate to relatively minor amendments to policy wording, both with respect to the proposed developer guidelines to site allocations and to strategic and development management policies. Officers are recommending these changes in response to consultation responses, but also to the need to provide additional clarity to policies. The Plan has also needed to reflect very recent changes to the Use Class Order classification that came into effect on 1 September relating to consolidation of several previous uses into a new Class E Use Class Order comprising commercial, business and service uses.
- 5.8 The proposed Regulation 19 version of the Local Plan proposes a small number of more significant changes to site allocations, in instances where consultation responses have raised new material considerations, and the site assessment process has been revisited. Also it is now proposed to include an additional development management policy concerning Strategic, Renewable and Low Carbon Infrastructure (Draft Policy 26) which includes criteria by

which the Council will consider proposals for wind and non-wind renewable energy infrastructure proposals.

5.9 With regard to the changes to site allocations, in summary it is proposed to:
Remove the following sites from the previous draft version of the Local Plan:

- Church Stretton: Land at Snatchfields for 70 dwellings (CST021);
- Oswestry: Land at Trefonen Road for 30 dwellings (OSW017);
- Weston Rhyn: Land off High Street for 60 dwellings (WRP006)
- Shrewsbury: Land at Battlefield Roundabout for 9ha of employment land (SHR197/VAR)

Include the following site in the Local Plan:

- Weston Rhyn: Land off Trehowell Lane for 60 dwellings (WRP001/VAR)

5.10 In the case of land at Snatchfields, Church Stretton (CST021), following consideration of comments made to the draft Plan, officers have reassessed the ability for the town to deliver its localised housing guideline through a combination of windfall sites within the development boundary, including on Brownfield land, and through the likely delivery of exception and cross-subsidy affordable housing sites, in line with draft policies DP4 and DP7 of the Draft Local Plan. Having undertaken this reassessment it has been concluded that these sources of supply are likely to be sufficient to achieve the localised housing guideline and as such it is considered that there is insufficient justification to warrant the allocation of major housing development in Church Stretton, given its location within the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and the need, documented within the NPPF, to demonstrate that exceptional circumstances exist for such major development within the AONB.

5.11 In the case of land at Trefonen Road, Oswestry (OSW017), following consideration of comments made to the draft Plan, officers acknowledge there are localised highway issues, which although are not considered to be severe, have been re-considered as part of the overall balance of considerations. These considerations have included the site's potential contribution to the overall housing supply in the town, which has been judged to be minimal over the plan period.

5.12 In the case of the proposed change to the site allocation at Weston Rhyn, by way of background, in 2018 the Council preferred site WRP001 for the development of around 60 dwellings. However, at this time it became apparent that the site may not be available for development due to the dated nature of the site promotion material. Therefore, this site was replaced by the adjacent WRP006 as the Preferred Site for the 'Regulation 18 Pre-Submission Draft of the Shropshire Local Plan' in August 2020, also for 60 dwellings. In response to this latest consultation the council have become aware of new promotional material from the promoters of WRP001, which confirms the site's availability as well as proposing new access arrangements. This, alongside the consideration of local concerns relating to access arrangements for WRP006, has led officers to revert to the preference for site WRP001, albeit in a slightly modified format, which also takes in a small element of WRP006. Both sites have therefore been subject

to public consultation during the regulation 18 stage of plan preparation, and importantly they are now subject to a “joint promotion” agreement between the landowners. It is therefore considered preferred options provides a more sustainable solution for the settlement’s housing delivery.

- 5.14 In the case of land at Battlefield Roundabout, Shrewsbury, following consideration of comments made to the draft Plan, which have highlighted concern about development to the east of the A49, as well as consideration given to the implications of the new Class E Use Class Order (which came into operation on 1 September during the consultation period), it is now considered unnecessary to specifically allocate this land for employment purposes. It is therefore considered that Shrewsbury’s employment provision can be met through the delivery of the proposed strategic employment site north of Preston Boats roundabout (SHR166); through other mixed use development proposed, particularly on land to the west of the town; through existing SAMDev allocations, and through additional windfall development where it meets proposed criteria set out in Draft Policies S13 and S14 of the Draft Local Plan.
- 5.15 The updated Site Assessments, which are to be made available as part of the Regulation 19 consultation, provide more detail on the rationale for these proposed changes. Whilst clearly of local significance, it is not considered any of these changes compromise the delivery of the Plan’s Strategic Approach.
- 5.16 It is not proposed to amend any proposed Community Hub settlements, and therefore the schedule of Community Hubs remains the unchanged from that consulted on in August/September 2020, and is now included in Schedule SP2.2 of the Draft Local Plan. Whilst it is recognised there remains some concern locally regarding the methodology behind the identification of Community Hubs within the overall strategic hierarchy, officers remain of the view that the proposed approach offers a sound and consistent basis to make these recommendations. These issues have been given very detailed consideration by officers in arriving at the current position. With regards to Community Cluster settlements, in acknowledging the continuation of the Parish Council ‘opt in’ approach to their identification, it is proposed that the Maesbrook, Dovaston and Knockin Cluster be removed on the request of the Knockin Parish Council, and that Newcastle and Whitcott Keysett be included as a new Community Cluster on the request of Newcastle on Clun Parish Council. All other Community Cluster settlement remain unchanged and are listed in Schedule SP2.3 of the Draft Local Plan.

Strategic approach to growth and distribution of development

- 5.17 PolicySP2 of the Pre-Submission Draft of the Local Plan sets out the overall growth aspirations for the County between 2016 and 2038 of around 30,800 new dwellings and around 300 hectares of employment land, equating to around 1,400 dwellings and 15ha of employment land per annum. This represents a marginally lower growth level than that proposed in the Preferred Scale and Distribution of Growth consultation carried out in early 2018, and is broadly in line with past rates of growth seen in the County.

- 5.18 This level of housing growth proposed across the 22 years covered by the Plan Period seeks to respond in the first instance to the most up-to-date calculation of housing need in the County, currently 25,894 dwellings over the Plan Period, and then accommodates an additional uplift in this capacity in order to respond positively to the overall 'high growth' strategy. It is considered this uplift will further support the delivery of family and affordable housing to support local needs; increase the opportunity for specialist housing and the needs of other groups; support the diversification of the workforce; support greater opportunities to support the Council's wider economic growth aspirations; and support the opportunity for the Council to respond positively to appropriate cross boundary needs.
- 5.19 It is recognised that the Government has recently consulted on a significant alteration to the way in which housing need is calculated at a local authority level, which in Shropshire's case would lead to a considerable increase in annual housing requirement to a level far in excess of the proposed Local Plan housing requirement. However, the Council have raised significant issues with the Government's proposed methodology, along with many other Local Authorities, and as things stand this proposal has not moved beyond its consultation stage. It is therefore considered appropriate for Shropshire to progress with its Local Plan on the basis of the current housing need methodology.
- 5.20 The approach to distribution of development reflects the Council's previously stated preferred option, favouring an 'urban focussed' approach. It is considered that by virtue of the infrastructure and services Shropshire's largest settlements generally provide, there is a greater opportunity to deliver larger scale mixed use schemes, in doing so providing better conditions to support additional employment delivery and providing a better balance of growth.
- 5.21 It is legal requirement for Local Planning Authorities to fulfil the duty to cooperate with neighbouring and closely related Local Planning Authority areas on strategic matters. The Council has been engaged in discussions with these areas over the course of the plan preparation process. Ahead of the proposed submission of the Local Plan in January 2021, a series of Statements of Common Ground will be prepared and agreed with these areas.
- 5.22 At the July Cabinet, as part of Shropshire's Duty to Cooperate, it was agreed that 'in principle' Shropshire Council would accept up to 1,500 dwellings from the identified housing need of the Association of Black Country Authorities (ABCA) and that this would be incorporated into the housing requirement for Shropshire and distributed in line with the Strategic Approach included in draft Policy SP2. Meeting this 'unmet' need responded positively to the obligations placed on the Council as part of the Duty to Cooperate and has been met with broad support from ABCA. In accepting this need in principle, Shropshire joined a number of other Local Planning Authorities in the West Midlands in doing so.
- 5.23 Whilst ABCA are supportive of Shropshire's approach with regard to meeting unmet housing need, they have also responded to the recent consultation seeking further clarification on the Council's approach to employment land provision and requesting the Council considers accepting an element of their

unmet employment land need. In broad summary, the ABCA's employment land supply provides around 305ha, leaving a shortfall of at least 263 hectares needing to be provided outside the Black Country Local Plan area.

- 5.24 Since July, the Council has further developed its consideration of economic need over the plan period, and an Economic Development Needs Assessment (EDNA) will be published alongside the Regulation 19 consultation. By way of early summary of this position, it is recognised that similar to the proposed housing requirement for the County, the proposed employment land provision of 300 hectares over the plan period is beyond the 'baseline' need scenario when looking at forecasted growth. This position is deliberate and responds to the Council's desire to see a 'step change' in economic growth in the County over the plan period; a position advanced by the Economic Growth Strategy.
- 5.25 With this in mind, it is therefore considered reasonable and appropriate for the Council to supplement its 'in principle' offer of housing need with an 'in principle' offer to meet up to 30 hectares of employment land from ABCA. It is again considered that this need can be accommodated in a sustainable manner in line with the Local Plan's proposed distribution of growth proposed in draft policy SP2, and would not require the identification of additional land in order to ensure its sustainable delivery. This offer is considered to respond effectively to Council's legal obligations under the Duty to Cooperate and if agreed, will be incorporated into the emerging Statement of Common Ground between the two planning areas.
- 5.26 At this advanced stage of plan making there are no other substantive issues arising from the conversations with adjoining authorities as part of the Duty to Cooperate.

Localised Strategies for individual settlements

- 5.27 In following the urban focussed approach the majority of the County's growth is captured in settlement specific strategies for Shropshire's network of Market Towns. For the majority of areas this includes proposed site allocations and guidelines on how development on these sites will be managed. It should be remembered that whilst the allocation of a site provides an 'in principle' support that development in this location can be supported, these will continue to be subject to the grant of future planning approval where the details of the development will be considered. Where local communities are currently preparing Neighbourhood Plans this has been reflected within the proposed strategies.
- 5.28 Whilst the focus of the plan is on the urban area, it continues to be important to plan effectively for Shropshire's rural areas, but in doing so recognising that growth opportunities in these areas should be more closely aligned with the ability of villages to provide a suitable standard of services and facilities. For this reason the Council opted early in the plan preparation process to provide a consistent methodology to the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The conclusions of this process are included in schedule SP2.2 of the Pre-Submission Draft Plan, which identifies those areas which are proposed to act as Community Hubs. Policy SP7, along with individual Settlement specific policies, seeks to

provide a framework for how development will be managed in these areas effectively and in keeping with the local character.

Strategic Sites and Settlements

- 5.29 The Pre-Submission version of the Local Plan proposes to allocate three strategic settlements/sites at the following locations:
- The Former Ironbridge Power Station which will form a new strategic settlement;
 - Clive Barracks, Tern Hill which will form a new strategic settlement; and
 - RAF Cosford which will facilitate MOD use and associated activities

Former Ironbridge Power Station

- 5.24 The former Ironbridge power station occupies a 350 acre site south of the River Severn near Buildwas. The power station ceased operation in 2015 and was purchased by Harworth Group in 2017 with a view to regenerating the site. The proposed inclusion of the site for inclusion within the Local Plan was consulted on as a preferred option in summer 2019. An outline planning application was subsequently submitted to the Council in December 2019 for a major mixed use development including 1,000 dwellings. Whilst the planning application is yet to be determined, it remains appropriate for the Council to continue to seek the site's inclusion within the Local Plan. It is expected that subject to the grant of planning approval, the site will be fully developed by the end of the plan period. The proposed development principles for the site are included in Policy S20 of the Pre-Submission Draft Local Plan

Clive Barracks, Tern Hill

- 5.25 Clive Barracks is a 50 hectare military site on the A41 near Market Drayton which is currently home to the Royal Irish Regiment. MOD announced the intention to close the barracks in March 2016, and have subsequently confirmed they now plan to complete the vacation and disposal of the site by 2025. The proposed inclusion of the site for inclusion within the Local Plan to form a significant mixed use proposal was consulted on as a preferred option in summer 2019. Local engagement on the site up to this point has helped to shape the proposed development guidelines for the site, which is proposed to provide employment land and around 750 homes as part of a new settlement, together with local services and facilities. Given the timeframe of the proposed disposal of the site, it is expected that around 600 homes will be delivered during the plan period to 2038. The proposed development guidelines for the site are included in Policy S19 of the Pre-Submission Draft Local Plan.

RAF Cosford

- 5.26 The national defence review has confirmed RAF Cosford as a key Ministry of Defence asset, but it is considered the potential for the area to meet its future operational defence requirements is restricted by its Green Belt location. Having considered the impact on national Green Belt objectives, as well as

the benefits of doing so, it is considered there are exceptional circumstances for the site to be released from the Green Belt. In summary the strategic site will build upon its existing role as a centre of excellence for both UK and International Defence Training, host a specialist aviation academy, support opportunities to co-locate other Ministry of Defence units and activities, facilitate the intensification and expansion of the RAF Museum Cosford and allow the formation of a new headquarters for the Midland Air Ambulance Charity. The proposed development guidelines for the site are included in Policy S21 of the Pre-Submission Draft Local Plan

Other Strategic Site Considerations

- 5.27 In July, Cabinet agreed with the officer recommendation to omit land adjacent Junction 3, M54 from the Local Plan Review. This decision followed a long period deliberation, including a period of public consultation as part of the Strategic Sites consultation in summer 2019 where the Council confirmed it was considering the potential inclusion of land north of Junction 3 within the Local Plan. For the sake of clarity the land at Junction 3 has been actively promoted for a new garden village consisting of around 3,000 dwellings and 50ha of employment land, as well as the inclusion of local facilities and services. The decision in July recognised that, in the view of the Council, that there were insufficient exceptional circumstances in order to release this land from the Green Belt.
- 5.28 As part of the Regulation 18 consultation on the Draft Local Plan, Bradford Estates (site promoter for Junction 3), whilst maintaining their wider Garden Village proposal, have provided an additional proposition consisting solely of a strategic employment site, without residential development. Given the change in proposal the Council has taken the opportunity to reconsider the proposal. The Site Assessments, which will be published alongside the Regulation 19 consultation, provides a detailed overview of the council's considerations. In summary, it is maintained that in weighing up the competing considerations, including the benefits of providing a strategic employment area, there remains insufficient justification to release this land from the Green Belt. Accordingly it remains the view of officers that land at Junction 3 should not be included in the Local Plan and that this should area should remain as Green Belt.

Green Belt Release

- 5.29 Green Belt is perhaps one of the most widely known designations in the planning system. Green Belts cover parts of many local authority areas; in Shropshire's case significant areas in the east of the County are covered by the West Midlands Green Belt designation. The key purposes of the designation is to check unrestricted sprawl; prevent neighbouring towns merging; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration.
- 5.30 Permanence is a key feature of Green Belt boundaries, and their extent should only be altered where exceptional circumstances apply. It is however, appropriate for Local Plans to review Green Belt boundaries when required,

and in Shropshire's case this was prompted in 2015 by the conclusions of the SAMDev Inspector's Report, which instructed that a review of Shropshire's Green Belt be carried out as part the Local Plan review process. To this end, in 2017 the Council commissioned a Green Belt Assessment in order to assess the extent to which the land within the Green Belt in Shropshire performs against the purposes of Green Belts (outlined in para 5.18). This was followed in 2018 by the publication of a Green Belt Review, which provides an assessment of the harm to the Green Belt purposes should particular parts of the Green Belt be released. The Council therefore have a comprehensive evidence base with which to support decision taking.

- 5.31 It is important to note that before seeking to release land from the Green Belt, the NPPF places a clear need for the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In addition to accommodating the needs of RAF Cosford, and having considered local circumstances of need, the Pre-Submission version of the Local Plan proposes the removal of land from the Green Belt for allocations for employment development within the plan period to 2038 in Shifnal and Bridgnorth, and for mixed use and housing development in Alveley. The Pre-Submission Draft Plan also seeks the removal of land from Green Belt for to act as 'safeguarded land' for potential development beyond the plan period in Albrighton, Shifnal and Alveley.
- 5.32 The Council are aware that over the last few months there has been a particular focus on future development options at Bridgnorth. Bridgnorth acts as Shropshire's third largest settlement but which is constrained by Green Belt on its eastern side. The Regulation 18 consultation on the draft Local Plan in August and September this year proposed a major Garden Village proposal at Tasley as the preferred option to grow the town in a sustainable manner. This represented a significant shift in position from an earlier iteration of the Plan, which had suggested land at Stanmore to the east of the town within the Green Belt as the preferred direction for significant growth as part of the initial Preferred Sites consultation in 2018. It should be recognised that the recent consultation has led to a significant level of opposition to the preferred Tasley proposal. However, it should equally be acknowledged there has also been a significant number of responses welcoming the proposed removal of the proposed Garden Village scheme at Stanmore.
- 5.33 The Council's proposed inclusion of land to the south of the A458 at Tasley within the most recent Draft Local Plan followed an extensive site assessment process. This recognised the site's location outside the Green Belt, but also went further to assess the site against a range of material considerations. The consultation in summer 2020 led to a significant level of response from residents of Bridgnorth, alongside those from local town and parish councils. It also prompted further detailed information from the site promoters of both the Tasley and Stanmore site promoters on a range of material planning considerations. Given the level of new information provided, as well as the significant of level of local interest, the Council has undertaken a re-appraisal of the two site options for the town.
- 5.34 Appendix 2 to this report provides a detailed summary of the site assessment considerations undertaken by the Council since the close of the recent

Regulation 18 consultation. In summary, having considered the competing site proposals against a full range of material considerations, it is maintained that the Tasley Garden Village proposal should be preferred for development to support a comprehensively planned mixed use development to meet the housing needs of Bridgnorth over the plan period. Conversely, it continues to be recommended that the majority of the Stanmore proposal should remain designated as Green Belt and should not be identified for future development. The exception to this is land north and west of the existing Stanmore Industrial Park, where it continues to be considered that the release of land from the Green Belt would be beneficial in supporting the future expansion needs of the Industrial Park to meet employment requirements.

Strategic and Development Management Policies to Guide New Development

- 5.35 The NPPF states that Local Plans should contain policies that are clearly written and unambiguous, and that a development plan must include strategic policies to address an area's priorities for the development and use of land in its area. A Local Plan can also include a series of non-strategic (or detailed) policies to address other more specific issues.
- 5.36 The Regulation 19 Pre-Submission Draft version of the Local Plan contains a number of Strategic and Development Management policies, covering a wide spectrum of issues and considerations relevant to the pursuit of sustainable development including climate change; supporting high quality design; managing development in the countryside; delivering affordable housing; ensuring a suitable residential mix of development; and managing and minimising flood risk. When adopted, these policies will replace the current development management policies in the Core Strategy and the SAMDev Plan.
- 5.37 Whilst the Local Plan should be the starting point for taking decisions on planning applications it does not sit in isolation. To this end many of the proposed development management policies make reference to other strategies being prepared by the Council, including the adopted Economic Growth Strategy 2017-2021, the emerging Housing and Climate Change Strategies, and the Shrewsbury Big Town Plan. In doing so these strategies will be a material factor in decision making.

6 Next steps

- 6.1 Subject to Cabinet approval, the Pre-Submission Draft of the Local Plan, along with the associated documents will be published for consultation for a period of seven weeks. It is proposed this consultation will begin on Wednesday 16th December and run until Wednesday 3rd February 2021, subject to the considerations outlined in para 6.2. Throughout the plan preparation process officers have sought to engage constructively with communities, Parish and Town councils, and elected representatives on

emerging preferred options. Whilst in many cases this has led to a consensus of opinion on issues, it is recognised there remains areas where there is likely to be opposition to proposals and that in some areas elected representatives have voiced their objections to proposals included within the Regulation 19 Pre-Submission Draft Plan. The statutory consultation process is an opportunity for communities, Parish and Town Councils and elected representatives to submit their comments on the soundness of the Plan, and these will be considered ahead of the proposed submission of the Local Plan to Government for examination in January 2021. All responses which are made to the Regulation 19 consultation will be made public, and will be submitted to the Planning Inspectorate for consideration at the Independent Examination.

- 6.2 The Consultation on the Pre-Submission Draft of the Local Plan must meet the Town and Country Planning (Local Planning) (England) Regulations 2012, as a minimum. For clarity this means the Pre-Submission Draft of the Local Plan must be made available for inspection at the Council's principal office (in this case Shirehall) and at such other places within the authority area as the Council consider appropriate, which has in previous stages of consultation been libraries. It is acknowledged that due to the Covid 19 national emergency there have been restrictions placed on public access into Council premises, and it is recognised that this will need to be addressed as a matter of priority before the consultation can begin. Consultation arrangements must also meet the requirements of the Council's Statement of Community Involvement (SCI). A significant number of organisations and individuals will continue to be notified directly of the publication of the consultation documents in accordance with the SCI. Electronic responses are encouraged to reduce printing and distribution costs and to reduce the time spent collating and analysing paper responses.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Cabinet Member (Portfolio Holder)
--

Robert Macey, Portfolio Holder for Housing and Strategic Planning

Local Members

All

Appendices

- | |
|--|
| <ol style="list-style-type: none">1. Shropshire Local Plan 2016-2038: Regulation 19 Pre-Submission Draft Local Plan plus associated Policies Map and Inset Plans2. Bridgnorth Development Options Assessment – November 20203. Local Development Scheme (LDS) – November 20204. Summary of Responses on the Regulation 18 Draft Local Plan Consultation |
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**Shropshire Local Plan Review
Consultation on Strategic Sites**

Consultation Period: 1st July 2019 to 9th September 2019.

Scope of the consultation

Topic of this consultation:	<p>This consultation document seeks views on preferred strategic sites and a further potential strategic site to inform the ongoing review of the Shropshire Local Plan. The document:</p> <ol style="list-style-type: none"> 1. Identifies a series of preferred strategic sites, specifically: <ol style="list-style-type: none"> a) Clive Barracks, Tern Hill; b) Former Ironbridge Power Station; and c) RAF Cosford 2. Identifies a further potential strategic site at land north of Junction 3 of the M54, which is currently subject to consideration but is <u>not</u> currently a preferred strategic site.
Scope of this consultation:	We are seeking views of all parties with an interest in the preferred strategic sites and/or other potential strategic site, so that relevant views and evidence can be taken into account in deciding the best way forward.
Geography:	These proposals relate to the administrative area of Shropshire Council.
Impact assessment:	The Strategic Sites Consultation Document has been subject to Sustainability Appraisal; has been screened under The Conservation of Habitats and Species Regulations 2010; and has been subject to an Equality and Social Inclusion Impact Assessment (ESIIA). The reports of these assessments are available on the Council's website.
Duration:	This consultation will run from: 1st July 2019 to 9th September 2019.
After the consultation:	We plan to issue a summary of responses on the Council's website within three months of the closing date of the consultation.

How to respond to this consultation

The consultation will be undertaken in line with the standards set out in the Council's published Statement of Community Involvement (SCI) and national guidance.

Consultation documents will be made available on the Shropshire Council website, and paper copies will be provided at libraries and council offices in the main towns.

A significant number of organisations and individuals will be notified directly of the publication of the consultation documents by email in accordance with the SCI.

To respond to this consultation, please use the questionnaire available on the Shropshire Council website at:

www.shropshire.gov.uk/local-plan-strategic-sites-consultation

Once completed, this questionnaire can be submitted by:

Email to: planningpolicy@shropshire.gov.uk or

Post to: Shropshire Council, Planning Policy & Strategy Team, Shirehall, Shrewsbury, SY2 6ND

Confidentiality and data protection

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

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1. Introduction

Strategic Sites

- 1.1 Strategic Sites are large sites of more than 25ha in size, which are not associated with meeting the growth needs of any particular settlement and contribute to achieving the aspirations of the Economic Growth Strategy for Shropshire.
- 1.2 Shropshire's Economic Growth Strategy identifies the need for a 'step change' in Shropshire's economy to: reduce levels of out commuting; retain employment and skills locally; increase productivity; and address housing affordability issues. The Economic Growth Strategy also identifies a number of strategic corridors and growth zones including the M54/A5 and A41 through Shropshire and identifies opportunities arising from the redevelopment of the Former Ironbridge Power Station.
- 1.3 This consultation document seeks views on preferred strategic sites and a further potential strategic site to inform the ongoing review of the Shropshire Local Plan.
- 1.4 These proposals are considered to provide strategic opportunities to deliver the objectives of Shropshire's Economic Growth Strategy, including the delivery of investment within strategic corridors, to increase the productivity and output of the local economy. They also have the potential to generate significant new investment in employment, thereby increasing the number but also the quality of jobs locally; provide additional housing, resulting in a positive opportunity to generate greater resilience in housing delivery through increased choice and competition; and contribute to improved infrastructure and local services.
- 1.5 The preferred strategic sites are:
 - Clive Barracks, Tern Hill;
 - Former Ironbridge Power Station; and
 - RAF Cosford.
- 1.6 Shropshire Council considers that there is sufficient evidence and justification for these proposals to be preferred for allocation as 'strategic sites'.
- 1.7 A further potential strategic site is land at Junction 3 of the M54. At this stage Shropshire Council considers that further evidence and justification is required to enable the site at Junction 3 of the M54 to be preferred for development. However, it is considered appropriate for the Council to consult on the site as a potential strategic site. If the site at land at Junction 3 of the M54 is proposed as a preferred 'strategic site' for development at the pre-submission draft stage of the plan preparation process, then this outcome will be subject to further consultation at that time.

Why are we reviewing the Local Plan?

- 1.8 The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with the adopted Neighbourhood Plans for Much Wenlock and Shifnal. These documents set out proposals for the use of land and policies to guide future development in order to help to deliver sustainable growth in Shropshire for the period up to 2026.

- 1.9 Local Planning Authorities are required to keep under review any matters that may affect the development of its area. Shropshire Council has determined to undertake a Local Plan Review in order to: allow the consideration of updated information on development needs within the County; reflect changes to national policy and our local strategies; extend the Plan period to 2036; and provide a plan which will help to support growth and maintain local control over planning decisions during the period to 2036. Maintaining an up to date Local Plan will support local growth by generating certainty for investment in local development and infrastructure through a policy framework that establishes an up to date and objective assessment of development needs and supports sustainable development in Shropshire during the period to 2036.
- 1.10 The overall strategic approach of focusing growth in Shropshire's Strategic Centre; Principal Centres and Key Centres, whilst enabling some controlled development in rural areas to maintain local sustainability, remains the preferred development strategy. Many of the existing policies in the Core Strategy and SAMDev Plan do not need to be amended and will be carried forward as part of the new Plan. The review will therefore focus on key areas of change, including options for the level and distribution of new housing and strategies for employment growth during the period to 2036, together with any amended policies and new site allocations which are needed to demonstrate that these requirements can be delivered. The existing Core Strategy and SAMDev Plan will remain in force until any new Plan is adopted. This is anticipated to occur during 2021.
- 1.11 The product of the review will be a new Local Plan document which merges the Core Strategy & SAMDev Plans and contains both strategic policies and more applied policies which primarily inform planning decisions, together with existing (and unimplemented) sites and new site allocations.

Strategic Context

- 1.12 Shropshire is a large, diverse but predominantly rural, inland County. However, Shropshire does not operate in isolation; it is influenced by cross boundary interactions with adjacent areas including Herefordshire, Worcestershire, the Borough of Telford and Wrekin, Staffordshire, the West Midlands conurbation, Cheshire and areas across the English-Welsh border. These include: cross border service provision such as shopping, health, education and leisure; transport links and commuting patterns; any inter-dependencies between housing markets and economic areas; and protection of the Green Belt and our landscape, historic and natural environments. These interactions are the subject of on-going discussions with neighbouring planning authorities under our 'Duty to Co-operate'. The spatial context for the Local Plan Review is described in detail in the Authority Monitoring Report (AMR) which is available on the Council's web pages. More detailed facts, figures and trends concerning the Shropshire context are also available on the Council's webpages at: <http://shropshire.gov.uk/facts-and-figures>

Progressing the Local Plan Review

- 1.13 The Strategic Sites Consultation represents the fourth stage of consultation on the Local Plan Review.

1.14 Previous stages of consultation undertaken are as follows:

- Issues and Strategic Options Consultation, which covered the following strategic options:
 - Housing requirement;
 - Strategic distribution of future growth;
 - Strategies for employment growth; and
 - Delivering development in rural settlements.
- Preferred Scale and Distribution of Development Consultation, which set out:
 - The preferred scale of housing and employment development in Shropshire 2016-36;
 - The preferred distribution of this growth;
 - Identified preferred housing and employment growth guidelines for the strategic centre and each principal and key centre;
 - Confirmed the methodology which Shropshire Council proposes to adopt to identify a settlement hierarchy in Shropshire;
 - Lists the settlements which form part of this hierarchy;
 - Proposed draft policies for the management of development within proposed Community Hubs and Community Clusters; and
 - Identified other development requirements which may need to be addressed as part of the Local Plan Review.
- Preferred Sites Consultation, which:
 - Outlined a housing policy direction to improve the delivery of local housing needs;
 - Established development guidelines and development boundaries for Shrewsbury, the Principal and Key Centres and each proposed Community Hub; and
 - Set out the preferred sites to deliver the preferred scale and distribution of housing and employment growth during the period 2016 to 2036.

1.15 Consultation documents and summaries of consultation responses associated with these previous stages of consultation are available on the Shropshire Council website at: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-partial-review-2016-2036/>

Supporting Assessments

1.16 The Strategic Sites consultation document has been subject to Sustainability Appraisal in line with the Environmental Assessment of Plans and Programmes Regulations 2004.

1.17 It has also been screened under The Conservation of Habitats and Species Regulations 2010 (as amended) and a Strategic Sites: Habitats Regulations Assessment (HRA) Screening Report.

1.18 An Equality and Social Inclusion Impact Assessment has also been undertaken.

1.19 Copies of these assessments are available on the Shropshire Council website, during this consultation period.

Evidence Base

- 1.20 The Local Plan Review is informed by an extensive evidence base which is available via the Council's webpages at:
<http://shropshire.gov.uk/planning-policy/local-plan/local-plan-partial-review-2016-2036/>

Identification of Preferred Strategic Sites

- 1.21 Preferred strategic sites have been carefully assessed using a detailed assessment framework which has been applied consistently across the County.
- 1.22 This framework has used available evidence from a variety of sources to assess the suitability of each site. The guidelines which accompany each site identify known infrastructure issues and mitigation measures, although it is expected that these will be further refined before the new Local Plan is submitted for examination.
- 1.23 The site assessment process consisted of three key stages, these are:
- Stage 1: The Strategic Land Availability Assessment (SLAA). This consisted of a strategic screen and review of all sites.
- Stage 2: Detailed screen of potential 'strategic sites'. This screening exercise was informed by consideration of a site's location, availability, size, potential to contribute to achieving the Shropshire Economic Growth Strategy; and whether there were obvious physical, heritage or environmental constraints present, based on the strategic assessment undertaken within the SLAA.
- Stage 3: Detailed site review. This stage was informed by assessments undertaken by the Council's Highways; Heritage; Ecology; Trees; and Public Protection Officers; various studies, including a Landscape and Visual Sensitivity Study and Strategic Flood Risk Assessment; consideration of infrastructure requirements and opportunities; and other strategic considerations and professional judgement.

Infrastructure Capacity assessments

- 1.24 The promoters of the preferred strategic sites have undertaken initial work to determine the capacity and impact of development proposals on infrastructure and the associated improvements to infrastructure to accommodate development proposals. These initial assessments have identified no fundamental infrastructure capacity constraints which cannot be addressed.
- 1.25 It is expected that more detailed infrastructure capacity assessments will be undertaken for these preferred strategic sites alongside the preparation of the Local Plan Review.
- 1.26 Infrastructure capacity assessments will also be undertaken in relation to the other potential strategic site.

What Happens Next?

- 1.27 We will publish a summary of the responses to this Preferred Options consultation on our web pages. The comments we receive will be used to inform the further development of the Local Plan Review.

2. Preferred Strategic Sites

Introduction

- 2.1 A series of preferred strategic sites have been identified across Shropshire. These sites have been subject to initial investigation and assessment by their promoters, resulting in the preparation of indicative masterplans.
- 2.2 This work is considered sufficient to allow Shropshire Council to determine in principle that these emerging proposals represent sustainable options for future development and that each site can contribute to meeting the development needs of Shropshire.
- 2.3 However, due to the size and complexity of development on these sites, lead-in times to development and likely build rates mean that in all likelihood only a proportion of the development proposed will contribute towards meeting the development needs of Shropshire up to 2036, the remainder will contribute to achieving the development needs of Shropshire in the longer term.

Clive Barracks, Tern Hill

Overview

- 2.4 Clive Barracks, Tern Hill is a 72ha military site located on the A41 strategic growth corridor near Market Drayton.
- 2.5 The site is currently home to the 1st (Regular) Battalion of the Royal Irish Regiment. However, in March 2016 the Ministry of Defence (MOD) announced plans to relocate the regiment and dispose of the Barracks for redevelopment.
- 2.6 Since this announcement the MOD and its consultants have been working closely with Local Councils, the local community and other stakeholders as part of a 'Task Force' led by Owen Patterson MP and preparing an extensive evidence base, to inform the sites redevelopment.
- 2.7 Supporting assessments undertaken by the MOD and their consultants include:
 - Topographical Survey;
 - Highways Report;
 - Noise Assessment;
 - Flood Risk and Drainage Assessment;
 - Utilities Assessment;
 - Ecology Survey;
 - Landscape and Visual Impact Appraisal;
 - Heritage Assessment;
 - Geophysical Survey; and
 - Arboricultural Survey.
- 2.8 It is also understood initial discussions have occurred between the MOD and their consultants and utility providers, which indicate sufficient capacity to support site redevelopment (although reinforcement works will be required to the gas network).
- 2.9 This evidence and engagement have informed the preparation of an indicative masterplan by the MOD and their consultants. This indicative masterplan illustrates the mixed-use redevelopment of the site to provide local services and facilities; around 5.75ha of employment land; around 750 homes; and extensive green

infrastructure, as part of a new settlement. Continued engagement through the 'Task Force' will help to refine and finalise proposals for the site.

2.10 The MOD have recently confirmed that they now plan for the site to be vacated and disposal for redevelopment to commence by 2025.

Key Issues and Opportunities

2.11 The table below summaries key issues/opportunities for Clive Barracks, Tern Hill:

Key Issues and Opportunities: Clive Barracks, Tern Hill
<ul style="list-style-type: none"> • Redevelopment of a primarily brownfield site. • Confirming specific mix of development on the site. There is an opportunity to provide high quality employment, housing, services and facilities and infrastructure (including integrated green infrastructure) as part of a new settlement. • The need to ensure that redevelopment is comprehensive, and delivery of necessary infrastructure, the local centre, leisure and education facilities, housing and employment are linked (site phasing). • Ensuring future occupiers have appropriate access to services and facilities. • Ensuring sufficient infrastructure is provided. • Relationship with nearby settlements, including the Principal Centre of Market Drayton. • As a large strategic site, it is not anticipated that redevelopment will commence until at least 2026/27. With an approximate build rate of 50 dwellings per annum, redevelopment will likely occur over a 16 year period. This means around 450 dwellings are likely to be constructed during the Local Plan Review period to 2036 and the remainder in the period beyond. • Land is required for the provision of a new primary school. This will enable Buntingsdale School and Stoke on Tern Primary School to merge on the site and ensure future residents have access to a primary school. • Ensuring necessary works to the highway network are undertaken. • Pedestrian and cycle connectivity through the site and in particular between the north-eastern and south-western portions of the site - through enhancement of an underpass of the A41. • Discussions required with the Clinical Commissioning Group (CCG) regarding access to medical services from the site. • Noise associated with the nearby airfield and roads. • Potential contamination on the site. • Continued engagement with utility providers and undertaking any necessary upgrades. • Ensuring natural environment and heritage assets are given appropriate consideration, buffering and where appropriate integrated into the redevelopment. • Community involvement and engagement especially through the Parish Councils and potential for community led projects as part of development. • Undertaking and implementing results of all necessary supporting assessments.

Preferred Strategic Site

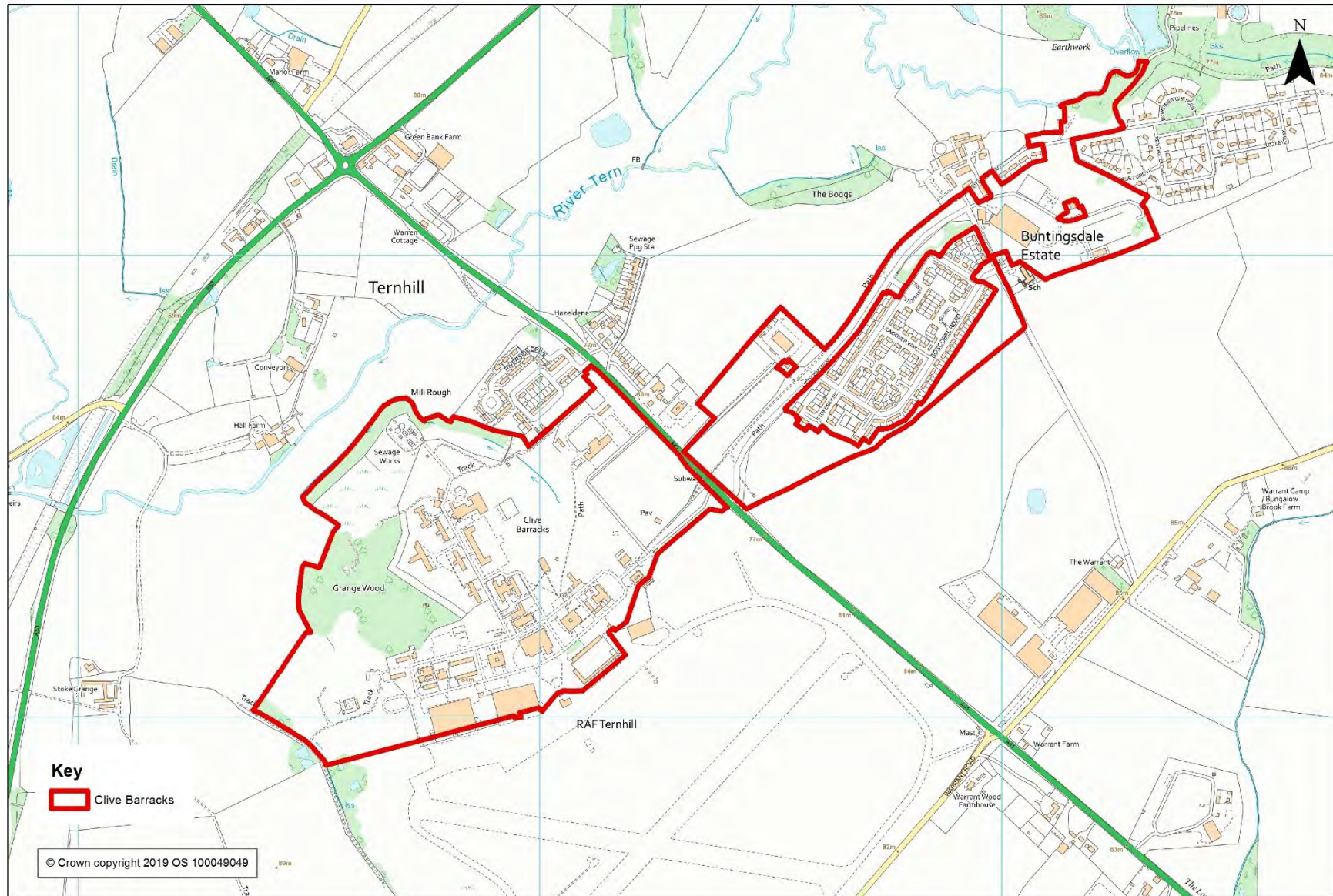
2.12 The Economic Growth Strategy for Shropshire identifies an objective to prioritise investment along strategic corridors and growth zones, including the A41 corridor. The Local Plan Review seeks to reflect this aspiration. The mixed-use redevelopment of Clive Barracks, Tern Hill will provide economic opportunities through the provision of local employment opportunities. It will also provide social and environmental opportunities resulting from the provision of additional new

homes, local services and facilities, extensive green infrastructure and provision of a modern purpose-built school to replace existing facilities.

- 2.13 As such, Shropshire Council considers that emerging proposals for the mixed-use redevelopment of Clive Barracks, Tern Hill represent a sustainable option for the future use of a large predominantly brownfield site. It is therefore considered appropriate to identify Clive Barracks, Tern Hill as a preferred strategic site, the redevelopment of which will contribute to meeting the development needs of Shropshire in the longer term.

Site Plan

2.14 The plan below indicates the location and extent of the Clive Barracks, Tern Hill preferred strategic site:



Initial Site Guidelines

2.15 The table below summarises the initial site guidelines for the Clive Barracks, Tern Hill preferred strategic site:

Site Location	Approximate Site Area	Approximate Capacity
Clive Barracks, Tern Hill	72ha	The MOD and their consultants emerging proposals for the site would involve Mixed-use redevelopment of the site, to provide local services and facilities; around 5.75ha of employment land; around 750 homes; and extensive green infrastructure, as part of a new settlement. These proposals will be subject to consideration as the Local Plan Review progresses.

Site Guidelines:
<p>a. Housing provision on the site should be of an appropriate quantity, quality, design, mix and layout.</p> <p>b. Employment provision is an intrinsic element of the sites redevelopment. Employment provision should be of an appropriate quantity and quality and should occur alongside the provision of housing.</p> <p>c. The local centre will comprise of a range of commercial uses (likely to be a family pub plus convenience store and a small number of modest retail units) on land fronting the A41. The local centre ensures future occupiers of the site benefit from access to local facilities. As such its timely provision is an important consideration and should be directly linked to provision and occupation of housing on the site.</p> <p>d. Green infrastructure provision should be of an appropriate quantity and quality. Its location should seek to protect and enhance the environmental network.</p> <p>e. 1ha of land will be provided for a primary school. This will enable Buntingsdale School and Stoke on Tern Primary School to merge on the site.</p> <p>f. Any necessary improvements to access points and the A41/A53 Tern Hill roundabout should be undertaken. Furthermore, an air quality assessment of the impact of increased vehicular movements from this development on Tern Hill roundabout should be undertaken and its recommendations implemented.</p> <p>g. Appropriate pedestrian and cycle links provided through the site and, in particular, to the proposed primary school and local centre. This includes enhancement of an underpass of the A41, to ensure connectivity between the north-eastern and south-western portions of the site.</p> <p>h. Acoustic design and layout of the site and appropriate building materials (including where necessary appropriate glazing, ventilation and acoustic barriers) should mitigate any impact from noise associated with the nearby A41 and airfield.</p> <p>i. The site may contain contaminated land, which will need to be appropriately managed.</p> <p>j. The site contains an area of ancient woodland and may contain priority habitats, these will need to be retained and an appropriate buffer provided.</p> <p>k. Site design and layout should be informed by an Arboricultural Impact Assessment, with the intention of creating a sustainable juxtaposition of houses and trees.</p> <p>l. The site is in proximity of the River Tern and RAF Tern Hill Local Wildlife Sites, these will need to be appropriately buffered.</p> <p>m. Site design and layout should reflect and respect the sites heritage and heritage assets within the wider area.</p> <p>n. The site should incorporate sustainable drainage, informed by a sustainable drainage strategy. Development should exclude the small portions of the site located in Flood Zones 2 and/or 3 and the small portions of the site located within the 1 in 1,000 year surface flood risk zone.</p> <p>o. Any other relevant supporting studies should be undertaken and their recommendations implemented.</p>

Indicative Masterplan

2.16 An indicative masterplan for the redevelopment of the site has been produced by the MOD and their consultants. These proposals will be subject to further consideration as the Local Plan Review progresses.



Former Ironbridge Power Station

Overview

- 2.17 The Former Ironbridge Power Station is a 140ha partly brownfield site comprising the former Power Stations and its associated uses; a former social club (redundant sports pitches, timber pavilion & golf course); borrow pits; Pulverised Fuel Ash (PFA) landfill waste tips; a rail siding, which was historically used to transport coal to the site; and agricultural land.
- 2.18 The site is located in east Shropshire, in close proximity to the village of Buildwas. The site is bounded by Buildwas Road and the River Seven to the north and east. To the west the site is bounded by Much Wenlock Road and agricultural land. The site's southern boundary runs contiguously with Bangham Woods, an ancient woodland and SSSI. The site is also located in close proximity to the Seven Gorge Conservation Area and Ironbridge World Heritage site.
- 2.19 Two power stations have been located on the site. The first, Ironbridge A, officially opened in 1932 and ceased operation in 1981. The second, Ironbridge B, began operation in 1969 and ceased operation in 2015.
- 2.20 Following the closure of the Ironbridge B power station a planning and development brief was prepared for the site in 2017 and it was subsequently purchased for redevelopment by the Harworth Group in 2018. The Harworth Group is a regeneration company specialising in large sites with complex issues. It is expected that the Harworth Group will commence demolition of the former power station buildings, including the cooling towers, later this year.
- 2.21 The Harworth Group have been working closely with Local Councils; the local community and other stakeholders, whilst also undertaking initial necessary assessments to inform redevelopment of the site.
- 2.22 Supporting assessments being produced by the Harworth Group to inform the redevelopment of the Former Ironbridge Power Station include:
- Landscape and Visual Impact Assessment;
 - Tree Survey;
 - Transport Assessment;
 - Travel Plan;
 - Air Quality Assessment;
 - Noise and Vibration Assessment;
 - Built Heritage Assessment;
 - Archaeological Assessment;
 - Extended Phase 1 Ecological Assessment and Phase 2 Habitat and Protected Species Surveys;
 - Flood Risk Assessment and Drainage Strategy; and
 - Ground Conditions and Land Contamination Assessment.
- 2.23 Discussions are also underway between the Harworth Group and utility providers to understand the works that will be required to support the redevelopment of the site.
- 2.24 The Harworth Group have also met with representatives of Ironbridge Medical Practice and discussions are underway with the both the Shropshire and Telford and Wrekin Clinical Commissioning Group (CCGs) in relation to GP capacity in the local area and how health needs of the increased population arising from the proposed redevelopment of the Former Ironbridge Power Station can be met. It is

anticipated that a new health facility will be provided as part of the site's redevelopment.

- 2.25 The Harworth Group's emerging proposals for the site would involve a mixed-use development, including around 1,000 dwellings; around 6ha of employment land; a retirement village; the provision of local services and facilities within a village centre; leisure facilities; a nursery and primary school; a park and ride; a railway station; and significant areas of green infrastructure (including allotments and sports pitches), as part of a new settlement. It should also be noted that the National Grid and Western Power Distribution substations and equipment are to be retained on the site.
- 2.26 The potential to re-open the railway line is being actively investigated, with the Harworth Group engaging with Network Rail and other interested groups. Emerging proposals include the identification of a central site for a railway station, this could potentially be used for a 'heritage' service; commuter rail service; and freight in relation to materials and mineral extraction in the early stages of redevelopment.
- 2.27 To illustrate these proposals, the Harworth Group have produced an illustrative masterplan for the site, which is provided below. These proposals and the illustrative masterplan will be subject to further engagement with stakeholders - including Shropshire Council and further comprehensive assessment.
- 2.28 Further information about the Harworth Groups proposals for the redevelopment of the Former Ironbridge Power Station, are available on the site promoter's website at: <https://ironbridgeregeneration.co.uk/>.

Key Issues and Opportunities

- 2.29 The table below summaries key issues/opportunities for the Former Ironbridge Power Station:

Key Issues and Opportunities: Former Ironbridge Power Station
<ul style="list-style-type: none"> • Redevelopment of a large area of brownfield land. • Confirming specific mix of development on the site. There is an opportunity to provide high quality employment, housing, services and facilities and infrastructure (including integrated green infrastructure) as part of a new settlement. • The need to ensure that redevelopment is comprehensive, and delivery of necessary infrastructure, the local centre, housing and employment are linked (site phasing). • Ensuring future occupiers have appropriate access to services and facilities. • Ensuring sufficient infrastructure is provided. • Relationship with nearby settlements, including Buildwas, Ironbridge, Telford and the Key Centres of Much Wenlock and Broseley. • As a large strategic site (much of which has previously been developed) with complex issues to be addressed, it is not anticipated that redevelopment will commence until at least 2022/23. However, the promoters consider that the development could be completed within the Local Plan Review period to 2036. • Need to retain the National Grid and Western Power Distribution substations, particularly the land take, need for a stand-off, ensuring necessary access restrictions, implications for surrounding land uses and noise. • Utilities infrastructure over and under the site. • Minimising landscape and visual impact. • Demolition, mineral working and decontamination of the site. • Provision of a new nursery, primary school and community facilities/buildings.

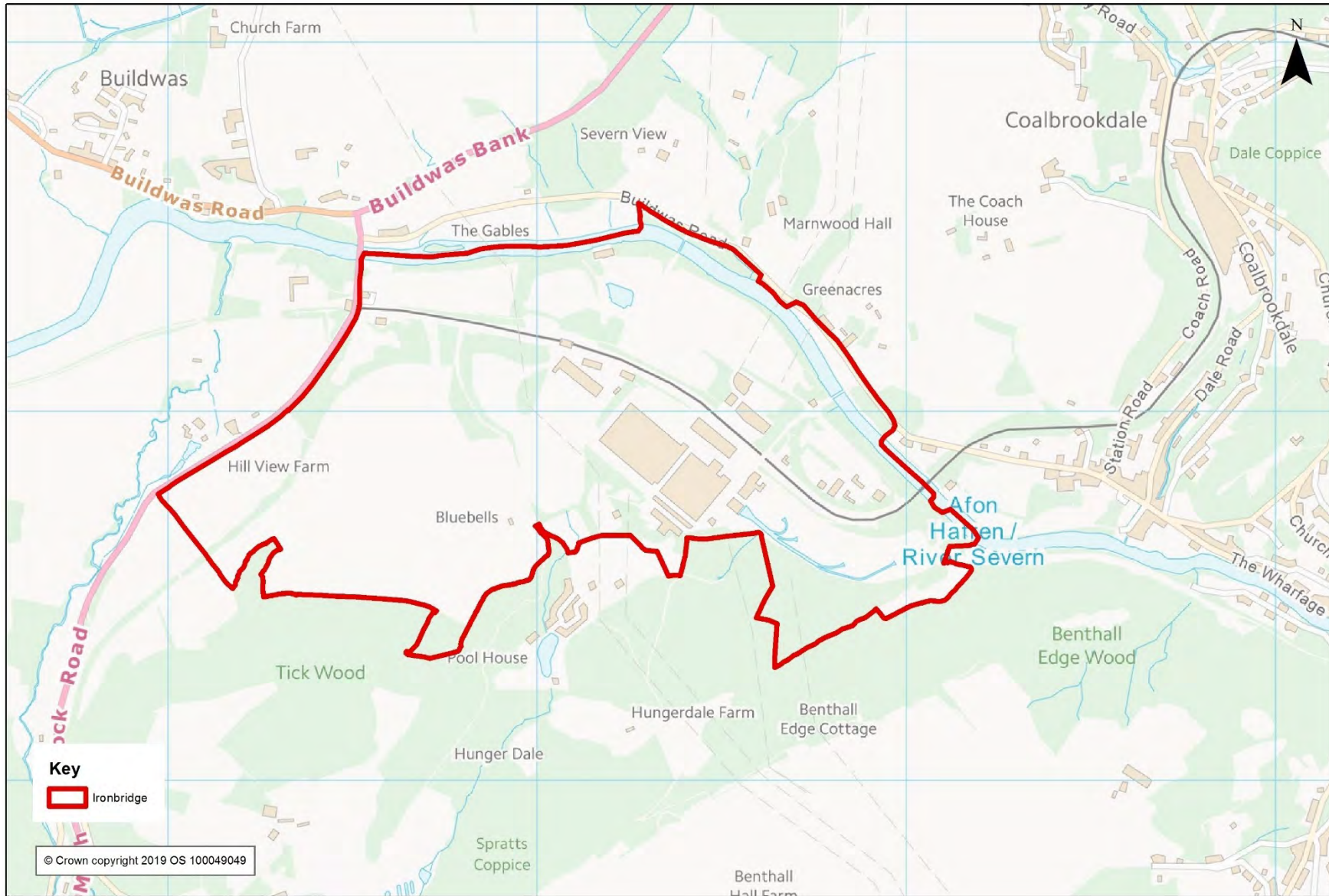
- Continued discussions with relevant CCGs regarding access to medical services. If needed, a medical centre should be provided.
- Ensuring appropriate accesses are provided and necessary works to the highway network undertaken.
- Opportunity to provide a railway station and re-use the existing rail link from the site.
- Enhancements to the leisure offer and supporting the visitor economy including linking to uses on the River.
- Pedestrian and cycle links through the site, particularly to key services and facilities.
- Provision of a park and ride facility.
- Ensuring natural environment and heritage assets are given appropriate consideration and where appropriate integrated into the redevelopment.
- Undertaking and implementing results of all necessary supporting assessments.

Preferred Strategic Site

2.30 The Economic Growth Strategy for Shropshire and the current Local Plan (Core Strategy) identified the opportunity to capitalise on the significant strategic opportunity arising from the redevelopment of the Former Ironbridge Power Station site. Shropshire Council considers that emerging proposals for the mixed-use redevelopment of the Former Ironbridge Power Station site present an opportunity to support the local economy, create jobs, provide housing and to sympathetically remediate the site and as such represent a sustainable option for its future use. It is therefore considered appropriate to identify the Former Ironbridge Power Station as a preferred strategic site, the redevelopment of which will contribute to meeting the development needs of Shropshire in the longer term.

Site Plan

2.31 The plan below indicates the location and extent of the Former Ironbridge Power Station preferred strategic site:



Initial Site Guidelines

2.32 The table below summarises the initial site guidelines for the Former Ironbridge Power Station preferred strategic site:

Site Location	Approximate Site Area	Approximate Capacity
Former Ironbridge Power Station Site	140ha	The Harworth Group's emerging proposals for the site would involve a mixed-use development, including around 1,000 dwellings; around 6ha of employment land; a retirement village; the provision of local services and facilities within a village centre; leisure facilities; a nursery and primary school; a park and ride; a railway station; and significant areas of green infrastructure (including allotments and sports pitches), as part of a new settlement. These proposals will be subject to consideration as the Local Plan Review progresses.

Site Guidelines:

- a. Housing provision on the site should be of an appropriate quantity, quality, design, mix and layout.
- b. Employment provision is an intrinsic element of the sites redevelopment. Employment provision should be of an appropriate quantity and quality and should occur alongside the provision of housing.
- c. The village centre ensures future occupiers of the site benefit from access to local facilities. As such its timely provision is an important consideration and should be directly linked to provision and occupation of housing on the site.
- d. Green infrastructure provision should be of an appropriate quantity and quality. Its location should seek to protect and enhance the environmental network.
- e. If considered needed by the relevant CCGs, the site should include provision of a medical centre.
- f. Community facilities and buildings are required, these should tap-in to the heritage of the site and could include a community hall, art gallery and heritage centre.
- g. If retained, current access points to the site may need to be upgraded to ghost island right turn and/or roundabout junctions as determined through appropriate modelling and engagement. Any additional access points should be appropriately designed and constructed.
- h. Appropriate pedestrian and cycle links need to be provided through the site and in particular to the proposed nursery, primary school and village centre.
- i. A comprehensive heritage assessment which addresses the site's relationship with designated heritage assets (including the Ironbridge Gorge World Heritage site, Buildwas Abbey Scheduled Monument, the Severn Gorge Conservation Area and two Grade II Listed Buildings) on and in proximity of the site will be required. This should guide the conservation and enhancement of these features including through high-quality design and layout.
- j. The Grade II listed Albert Edward railway bridge on the sites boundary and buildings and structures associated with the Ironbridge A interwar power station should be sympathetically retained, enhanced/maintained and adaptively reused.
- k. Acoustic design and layout of the site and appropriate building materials (including where necessary appropriate glazing, ventilation and acoustic barriers) should mitigate any impact from noise associated with the retained National Grid and Western Power Distribution substations and equipment and nearby roads.
- l. Design and layout should minimise landscape and visual impact, particularly associated with any development on greenfield elements of the site.
- m. The site contains contaminated land, which will need to be appropriately managed.

- n. The site contains part and is in proximity to the remainder of: the Buildwas Sand Quarry SSSI, Local Wildlife Site and Local Geological Site and Tick Wood and Benthall Edge SSSI. It may also contain priority habitat. These will need to be retained and appropriate buffers provided.
- o. The site is also in proximity of the Buildwas River Section SSSI, three Ancient Woodland sites and other Local Wildlife Sites. An appropriate buffer to these sites will be required.
- p. The site supports a large population of Great Crested Newts; bat roosts and is likely home to other protected species. Appropriate assessment and provision on the site will be required for these species.
- q. Site design and layout should be informed by an Arboricultural Impact Assessment, with the intention of creating a sustainable juxtaposition between built development and trees. Where possible trees and woodland should be incorporated into areas of open space and planting should occur to connect to / expand adjoining wooded areas.
- r. Development should exclude the portions of the site located in Flood Zones 2 and/or 3 and the portions of the site located within the 1 in 1,000 year surface flood risk zone.
- s. Mineral extraction opportunities associated with the site should be investigated and where appropriate extraction works undertaken.
- t. The site should incorporate sustainable drainage, informed by a sustainable drainage strategy.
- u. Any other relevant supporting studies should be undertaken and their recommendations implemented.

Indicative Masterplan

2.33 The latest illustrative masterplan prepared by The Harworth Group for the redevelopment of the Former Ironbridge Power Station site. These proposals will be subject to further consideration as the Local Plan Review progresses.



IRONBRIDGE MASTERPLAN

Approximately 1000 houses

Retirement Village

Primary and Nursery School

Allotments

Railway Station

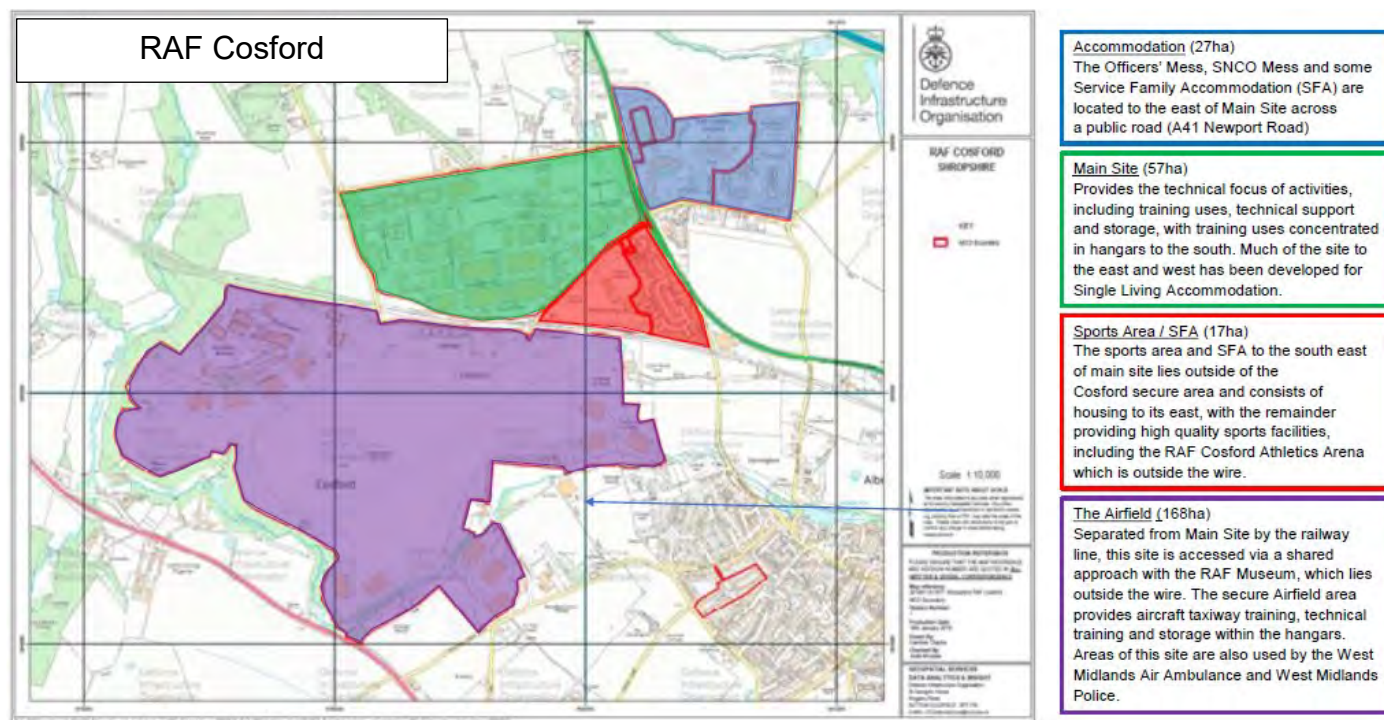
- | | |
|---|---|
| <ul style="list-style-type: none"> • Employment Zone : Approx. 6 Hectares • Village Centre : Approx. 3 Hectares | <ul style="list-style-type: none"> • Leisure and Schools : Approx. 3 Hectares • Park and Ride : Approx. 1 Hectare |
|---|---|

RAF Cosford

Overview

2.34 RAF Cosford is a military base and airfield located wholly in the Green Belt, to the north west of Albrighton. RAF Cosford opened in 1938 as a joint aircraft maintenance, storage and technical training unit and remains primarily a training unit to present day. The site also houses the renowned Cosford Air Museum and hosts the Cosford Air Show. Areas of the site are also used by the West Midlands Air Ambulance and West Midlands Police.

2.35 RAF Cosford consists of four broad areas, these are depicted on the Figure below:



2.36 RAF Cosford is currently a major part of the Defence College of Technical Training (DCTT). It is at the centre of the RAF's mission to deliver flexible, affordable, modern and effective technical training that meets the needs of the UK's Armed Forces now and into the future.

2.37 The MOD is undertaking a 'Defence Optimisation Programme' the aim of which is to create a smaller and significantly better estate that effectively supports our armed forces, and their role in protecting the security, independence and interests of the UK at home and abroad.

2.38 Due to its strategic location; existing built estate; the importance of the role it already plays in defence training; and the site's future potential, the disposal of RAF Cosford was discounted by the MOD at an early stage of this programme. As such, its future is more certain as it has been designated a 'receiver site' and will have an important role to play in the future optimisation of the MOD estate.

2.39 Cosford has since been referenced within the 'Better Defence Estate Strategy' as a centre of excellence for both UK and International Defence Training. The document also refers to the relocation of 4 School of Technical Training from MOD St Athan to RAF Cosford.

- 2.40 Furthermore, as part of its future strategy, the DCTT is reviewing capacity at RAF Cosford, linked to their aspiration to exploit opportunities for technical training consolidation. Whilst this work is ongoing, estimates from DCTT high-level strategic estate planning indicate that over the next 10+ years RAF Cosford would see in the region of an additional 1,500 people (staff and student population), although this could potentially increase further dependant on the outcome of the ongoing work.
- 2.41 In addition to the consideration of requirements arising from the DCTT:
- Work is currently underway by the MOD to capture and consolidate information on the feasibility of other potential non-DCTT moves to RAF Cosford.
 - Cosford Air Museum, located on the site, has outlined plans for a £40 million investment programme over 10 years to intensify and expand the museum site.
 - Plans to form a specialist aviation academy, called the Whittle Academy, at RAF Cosford have recently been announced by the Aviation Skills Partnership in collaboration with Midlands Engine, the RAF, Air Cadets and Telford College. This is a major initiative to address demand for trained entrants to the Aviation Industry across all jobs, roles and skills in accordance with the Government's Green Paper Aviation 2050: The Future of UK Aviation. It also further elevates the importance of this location for UK aviation and potentially creates hundreds of new jobs at the site.
- 2.42 These changes will have associated requirements for new facilities, including training facilities; technical accommodation and domestic accommodation. Although it should be noted that proposals for new development and intensification of the use of RAF Cosford are expected to be for military use or non-profit making uses rather than acting as a contribution to meeting Shropshire's future growth needs.
- 2.43 Whilst there is some potential for the re-use or redevelopment of existing buildings within the Main Site and there could also be some expansion on the accommodation area of the site (although this would in all likelihood need to be limited to domestic development given the current uses on this part of the site), it is likely that any significant expansion of RAF Cosford will also involve the development of land associated with the airfield and/or the re-location of the sports facilities.
- 2.44 RAF Cosford is wholly located within the Green Belt but is recognised as a major developed site within the Green Belt in the current Local Plan. However, if the proposed growth is to occur, there would be a need to remove some or all of the site from the Green Belt.
- 2.45 Government requires changes to the Green Belt to be made through the Local Plan process and for any proposed release of Green Belt to provide for the longer term, enduring well beyond the Plan period. It is expected that Green Belt boundaries should only be altered where justification and satisfactory evidence, known as 'exceptional circumstances' for doing so can be provided.
- 2.46 This includes consideration of the need to promote sustainable patterns of development, including planning for economic growth, housing need, health and wellbeing, accessibility, heritage and environmental factors.
- 2.47 To inform the ongoing Local Plan Review, a two-stage assessment of the Green Belt in Shropshire has been undertaken by specialist consultants and published by Shropshire Council.

2.48 The Green Belt Assessment (Part 1) considers the performance of Green Belt across Shropshire by dividing it into parcels of land and assessing each parcel (providing them a rating of no contribution; weak; moderate or strong) against the five nationally defined purposes that Green Belt serve, these are:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.49 The Green Belt Review (Part 2) is focused on considering the potential harm to the Green Belt resulting from the release of parcels of land, areas of opportunity around identified settlements and strategic geographical locations, if they were identified to provide for development needs and support a sustainable pattern of future growth in the County to 2036 and beyond.

2.50 Within the Green Belt Assessment and Review (Part 1 and Part 2), RAF Cosford is considered as part of three parcels of land, specifically parcels P28, P30 and P40.

2.51 The Green Belt Assessment (Part 1) of the performance of these parcels against Green Belt purposes 1a, 1b, 2, 3, & 4 is summarised in the table below. Purpose 5 is identified as important across all parcels, but the study considers that assessment of performance of individual parcels against this purpose is not possible in a meaningful way:

Parcel Reference	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
P28	No contribution	No contribution	Weak	Weak	No contribution
P30	No contribution	No contribution	Moderate	Moderate	No contribution
P40	No contribution	No contribution	Moderate	Weak	Weak

2.52 This Green Belt Review (Part 2) indicates the harm to the Green Belt resulting from the release of the parcels which contain elements of RAF Cosford, this can be summarised as follows:

- Main Site and Sports Area is low harm;
- Accommodation area is low-moderate harm; and
- Airfield is primarily low-moderate harm.

2.53 Within the Green Belt Review (Part 2) an opportunity area (Co-1b) containing the majority of RAF Cosford (excluding a small portion of the airfield) was also reviewed and identified as having low-moderate harm to the Green Belt if released.

2.54 Whilst it could be considered that low performing Green Belt may be a less sensitive release option it should be noted that the relatively poor performance of any land against Green Belt purposes, is not in itself, an 'exceptional circumstance' that would justify release of the land from the Green Belt. Conversely, better performing Green Belt may be appropriate for release where 'exceptional circumstances' are demonstrated.

Key Issues and Opportunities

2.55 The table below summaries the key issues/opportunities for RAF Cosford:

Key Issues and Opportunities: RAF Cosford and Cosford Air Museum
<ul style="list-style-type: none">• The site is located within the Green Belt. Specifically, RAF Cosford is identified as a major developed site within the Green Belt in the current Local Plan.• The site consists of significant areas of both brownfield and greenfield land.• Ensuring high quality design and layout.• Ensuring future occupiers have appropriate access to services and facilities.• Ensuring sufficient infrastructure is provided.• Discussions will be required with utility providers to determine any necessary infrastructure upgrades and timescales and process for these to be achieved.• Relationship with nearby Albrighton.• Preparation of an indicative masterplan for the site to ensure a strategic and comprehensive approach is taken to any redevelopment and further development of the site.• Pedestrian and cycle links through the site, particularly linking the broad areas of the site.• Opportunity to upgrade Cosford railway station facilities and parking.• Necessary upgrades to highway services.• Ensuring natural environment and heritage assets are given appropriate consideration and where appropriate integrated into the redevelopment.• Development is expected to be for military use or non-profit making uses rather than acting as a contribution to meeting Shropshire's future growth needs.• Opportunities for co-location of supply chain and complementary employment offers.• Undertaking necessary supporting assessments and implementing their recommendations.

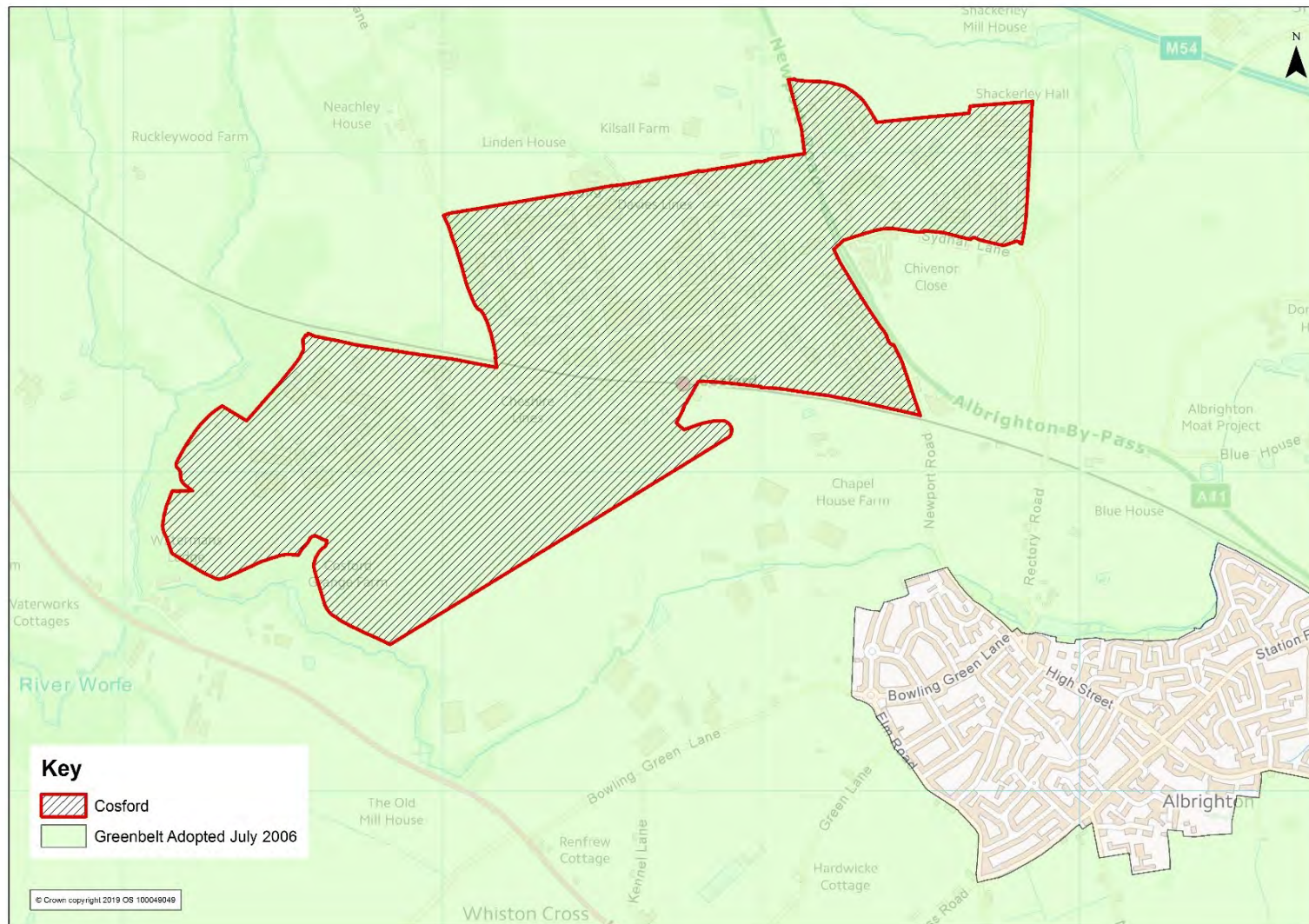
Preferred Strategic Site

- 2.56 Shropshire Council considers that emerging proposals for the enhancement of RAF Cosford's role as a centre of excellence for both UK and International Defence Training; plans to form a specialist aviation academy; any opportunities to co-locate other MOD services; and plans for the expansion of the Cosford Air Museum are nationally significant and as such represent a significant strategic opportunity for Shropshire and the MOD. Proposals would also contribute toward achieving the aspirations of the Shropshire Economic Growth Strategy and increase the long-term sustainability of the site, ensuring its continued use as a MOD facility, offering increased employment and education opportunities and housing to meet the needs of personnel.
- 2.57 It is also apparent that there are no alternative locations to achieve these outcomes, given the extent of existing facilities on the site and the findings of the extensive 'Defence Optimisation Programme' undertaken by the MOD.
- 2.58 It should be noted that proposals for new development and intensification of the use of RAF Cosford are expected to be for military use or non-profit making uses rather than acting as a contribution to meeting Shropshire's future growth needs. However, the proposals do have the potential to offer wider benefits resulting from the co-location of supply chain and complementary employment offers over a much wider geography including a number of neighbouring Local Authorities.

- 2.59 As such it is considered appropriate to identify RAF Cosford as a preferred strategic site. It is also considered appropriate to propose to remove an element of the site from the Green Belt (the specific area is illustrated in the site plan below).
- 2.60 The area identified for release from the Green Belt reflects the main operational area (including ancillary uses such as accommodation and the museum) and land potentially needed for short/medium term development needs and to provide future operational flexibility including reflecting security requirements. This is in line with national guidance which seeks to ensure that changes to Green Belt boundaries endure for the longer term beyond the Plan period. Significantly, the extent of Green Belt release which is proposed maintains Green Belt within the important gap between RAF Cosford and the settlement of Albrighton.
- 2.61 The Council acknowledges that it will need to demonstrate robust 'exceptional circumstances' through the Local Plan Examination process in order for any land to be released from the Green Belt and for any planned development to happen.

Site Plan

2.62 The following map depicts the location and extent of the area Shropshire Council is proposing for release from the Green Belt in order to support the identification of RAF Cosford as a preferred strategic site. Boundaries are defined by a combination of roads; natural features such as woodland belts and hedgerows; and the runway.



Initial Site Guidelines

2.63 The table below summarises the initial site guidelines for the RAF Cosford preferred strategic site:

Site Location	Approximate Site Area	Approximate Capacity
RAF Cosford	203ha	<p>The 'Defence Optimisation Programme' has identified RAF Cosford as a 'receiver site'. As such it is considered by the MOD to have capacity for increased MOD and associated uses. Particularly:</p> <ul style="list-style-type: none"> • Enhancement of RAF Cosford's role as a centre of excellence for UK and International Defence Training. • Plans for expansion of the Cosford Air Museum. • Opportunities to co-locate other MOD services. • Formation of the Whittle Academy by the Aviation Skills Partnership in collaboration with Telford College. <p>Identification as a preferred strategic site and proposed removal of land from the Green Belt would facilitate these uses.</p> <p>These proposals will be subject to consideration as the Local Plan Review progresses.</p>
Site Guidelines:		
<ol style="list-style-type: none"> a. Existing services and facilities, including sports provision should be maintained or appropriate and proportional compensatory provision made. b. Extensive areas of green infrastructure, including areas of public open space should be integrated into any development proposals. Green infrastructure provision should seek to protect and enhance the environmental network (particularly in the south and west of the site). c. The site is likely home to protected species, including Great Crested Newts. Appropriate assessment and provision on the site will be required for any protected species present. d. The site may contain priority habitats, these will need to be retained and an appropriate buffer provided. Any mature trees and hedgerows present should also be retained on the site. e. Reflecting likelihood of increased movements to and from the site, improvements to the railway station and station car parking should be provided. f. Necessary improvements to existing access points should be undertaken and any additional access points should be appropriately designed and constructed. g. Appropriate pedestrian and cycle links need to be provided through the site and in particular between the main site and airfield. h. The site may contain contaminated land and is in proximity of sources of odour (sewage treatment works), which will need to be appropriately managed. i. The design, layout and materials of any development on the site should mitigate impact from noise associated with the airfield and railway line. j. The site should incorporate sustainable drainage, informed by a sustainable drainage strategy. Development should exclude the portions of the site located within the 1 in 1,000 year surface flood risk zone. k. The site contains the majority of the expansion period airfield; Grade II listed Fulton Building; and a range of other military buildings which are considered to be non-designated heritage assets. As such a heritage assessment will be required and its recommendations implemented. Site design and layout should be sympathetic to these assets and should contribute to better revealing and enhancing their significance. l. Habitats Regulations Assessment (HRA) will be required. m. Any other relevant supporting studies should be undertaken and their recommendations implemented. 		

3. Other Potential Strategic Sites

Introduction

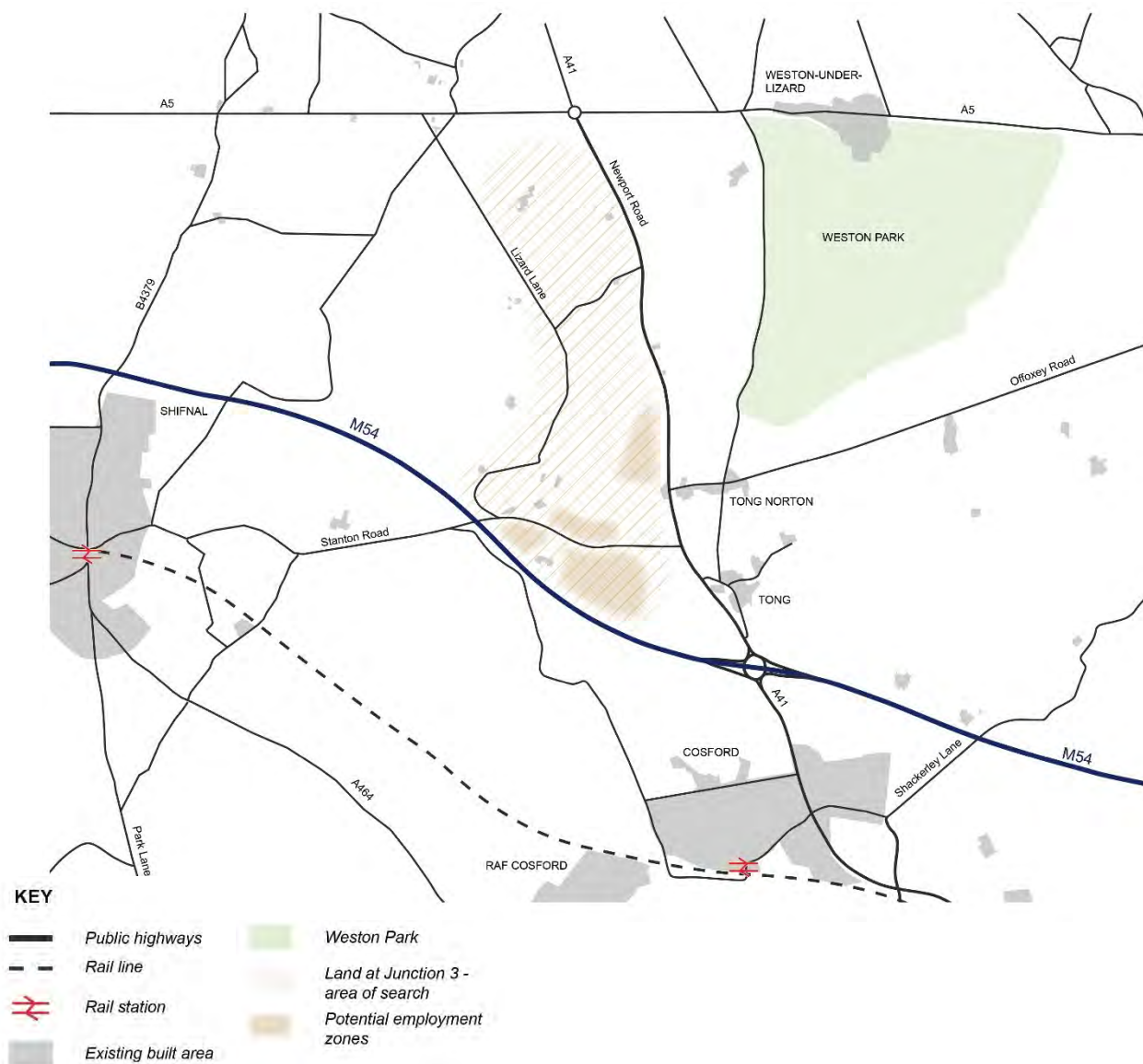
- 3.1 In addition to the three preferred strategic sites, a further potential strategic site has been identified: specifically land north of Junction 3 of the M54.
- 3.2 However, a range of further information is required to inform any decision about this proposal. In light of this, this site is **not** currently being identified as a preferred strategic site. Instead, this consultation document seeks comments on:
 - The potential benefits of the proposed development;
 - The issues and impacts which might be generated; and
 - Ways in which these might be mitigated or addressed.
- 3.3 Responses to this consultation, alongside the information gathered as part of the evidence base to inform the ongoing Local Plan Review will inform the decision as to whether or not this site will be identified as a preferred strategic site.
- 3.4 If land north of Junction 3 of the M54 is proposed as a preferred strategic site for development at the pre-submission draft Local Plan stage, then this outcome will be subject to consultation as part of the pre-submission consultation.

Land north of Junction 3 of the M54

- 3.5 The M54/A5 corridor is a key east-west road and rail transport corridor between Shropshire and the West Midlands. It is identified within the Economic Growth Strategy for Shropshire as a strategic corridor, in recognition of the economic opportunities associated with this transport infrastructure and its contribution to reinforcing Shropshire's close proximity to the West Midlands conurbation.
- 3.6 Furthermore, recent evidence commissioned by Shropshire Council suggests that the M54/A5 corridor, much of which is located within the Green Belt, is a significant opportunity area and suggests there is considerable latent demand for serviced employment land to meet the needs of both occupiers for inward investment and local occupiers in the target sectors identified in the Economic Growth Strategy for Shropshire. As part of this work, the consultant has engaged with neighbouring Local Authorities and regional organisations including the West Midlands Combined Authority (WMCA).
- 3.7 It is envisaged that any strategic employment offer in the M54 corridor would be strongly related to the intensification of engineering training at RAF Cosford and would be complementary, rather than competing with, the employment offers within neighbouring areas. As such, the key objective for such a site would be to deliver supply chain opportunities and growth for companies in key sectors identified within the Economic Growth Strategy for Shropshire (including but not limited to engineering, advanced manufacturing, aviation, innovative healthcare and environmental technologies) and in many ways complementary to proposals for RAF Cosford.
- 3.8 As a strategic location, the M54 corridor benefits from its proximity to existing international businesses, dominant in growth sectors such as advanced manufacturing and engineering. The corridor also benefits from good access to transport infrastructure and will benefit from planned investments in road and rail infrastructure in neighbouring areas. Importantly, the corridor contains and is close

to higher education and training institutions including key assets such as RAF Cosford, Wolverhampton University and Harper Adams University.

- 3.9 Land to the north of Junction 3 of the M54 was promoted for development on behalf of the landowners the Bradford Estate, in March 2017, in response to the Issues and Strategic Options consultation of the Local Plan Review.
- 3.10 The site promoters have since amended the scale and extent of proposals. The most recent proposals are focused on land to the north of Junction 3 of the M54 and west of the A41. These proposals are for the construction of a strategic employment site of around 50ha; accompanied by around 3,000 homes; and a local centre to provide services, facilities and infrastructure, as part of a planned settlement.
- 3.11 The site promoters have identified an 'area of search' informed by initial assessments of key constraints and opportunities. The map below depicts the 'area of search' identified by the site promoters.



- 3.12 As this location is within the Green Belt, there would be a need to demonstrate robust 'exceptional circumstances' through the Local Plan Examination process in order for the site to be removed from the Green Belt and for any planned development to occur.

3.13 Within the Green Belt Assessment and Review the area of search identified by the Site Promoters of land at Junction 3 of the M54 is considered as part of parcels P4, P8 and P25.

3.14 The Green Belt Assessment (Part 1) of the performance of these parcels against Green Belt purposes 1a, 1b, 2, 3, & 4 is summarised in the table below. Purpose 5 is identified as important across all parcels, but the study considers that assessment of performance of individual parcels is not possible in a meaningful way:

Parcel Reference	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
P4	No contribution	No contribution	No contribution	Strong	Weak
P8	No contribution	No contribution	Weak	Strong	Weak
P25	No contribution	No contribution	Weak	Moderate	No contribution

3.15 This Green Belt Review (Part 2) indicates the harm to the Green Belt resulting from the release of the parcels which contain elements of the site at land north of Junction 3 of the M54, this can be summarised as follows:

- P4 is not specifically assessed, however there is likely to be high harm based on similarities to P8;
- P8 is high harm; and
- P25 is moderate-high harm.

3.16 Within the Green Belt Review (Part 2) a large opportunity area (J3-1) containing the majority of the site at land north of Junction 3 of the M54 and significant additional land was also reviewed and identified as having high harm to the Green Belt if released.

3.17 Whilst it could be considered that low performing Green Belt may be a less sensitive release option it should be noted that the relatively poor performance of any land against Green Belt purposes, is not in itself, an 'exceptional circumstance' that would justify release of the land from the Green Belt. Conversely, better performing Green Belt may be appropriate for release where 'exceptional circumstances' are demonstrated.

3.18 Based on the information currently available, it is not considered that the release of land north of Junction 3 of the M54 would be necessary to achieve the planned growth for Shropshire. However, national planning policy requires Shropshire Council to plan positively for growth by providing a strategy which, as a minimum, seeks to meet local development needs and to consider any unmet need from neighbouring areas and whether it is practical to meet some or all of this need, where this is considered appropriate and consistent with the principles of achieving sustainable development.

3.19 The latest evidence indicates that the Black Country cannot accommodate its identified development needs within its urban area. The Black Country Authorities estimate that there will be a shortfall of around 300ha of employment land, with a particular need for additional high quality, accessible sites capable of accommodating national investment requirements. Similarly, even by increasing densities and looking to other sources of urban land supply, the latest evidence also suggests that there will be a significant housing shortfall of at least 22,000 homes in the Black Country. The options available to the Black Country to meet this need, including through Green Belt release within the Black Country and nearby Local Authorities are currently being investigated by the Black Country Authorities.

- 3.20 The characteristics of the M54 corridor highlighted above and its general proximity/accessibility to the Black Country, mean that, subject to the work being undertaken by the Black Country Authorities, there may be potential for Shropshire to agree to provide for some of this shortfall through the construction of a strategic employment site and housing as part of a new planned settlement at Junction 3 of the M54.
- 3.21 The initial assessments of key constraints and opportunities undertaken by the site promoters include:
- Preliminary Highways Review;
 - Preliminary Access Review in respect of the proposed Strategic Employment Area (SEA);
 - Preliminary Appraisal of Flood Risk, Surface Water Drainage and Water Resources;
 - Preliminary Habitat Regulations Assessment (HRA);
 - Ecological Desk Study;
 - Extended Phase 1 Habitat Survey;
 - Initial Heritage Assessment;
 - Initial Heritage Gazetteer;
 - Archaeological Appraisal;
 - Preliminary Landscape and Visual Appraisal and Capacity Study;
 - Ground Conditions Technical Note;
 - Utilities Constraints Briefing Note; and
 - Initial Sustainability and Energy Review.
- 3.22 The site promoters intend to further develop these assessments in order to determine initial design principles and inform preparation of an initial masterplan. The site promoters intend to provide information about their proposals on their website at: <https://j3shropshire.co.uk>
- 3.23 These assessments and proposals will be subject to consideration as the Local Plan Review progresses.
- 3.24 Investigation of infrastructure capacity, including: the infrastructure requirements directly associated with this development; the strategic infrastructure requirements within the wider corridor; and identification of funding options available to deliver necessary infrastructure improvements, is also being undertaken.
- 3.25 This information will allow Shropshire Council to undertake a comprehensive consideration of the opportunity, if it is required to meet Black Country needs.
- 3.26 Shropshire Council recognises that this proposal may represent a 'once in a generation' opportunity to meet cross-boundary needs, through delivery of nationally significant employment opportunities, high quality housing and a local centre to provide services, facilities and infrastructure as part of a planned new settlement within an important strategic corridor. However, given the likely scale of the proposal it is considered there are a number of significant issues which need further consideration ahead of the Council being able to prefer this land for development, such as:
- The strategic scale of these proposals and mix of employment, residential and other uses;
 - Concerns about impacts on existing infrastructure, communities and environmental assets;

- Justification for the release of Green Belt land – this is considered to be intrinsically linked with the assessment of the alternative options available to meet Black Country housing and employment needs; and
- Securing strategic infrastructure investment and cross boundary agreement with neighbouring authorities.

3.27 A range of further information is therefore required to inform any decision about this proposal and, in light of this, land north of Junction 3 of the M54 is **not** currently being identified as a preferred strategic site. Instead, the consultation document seeks comments on:

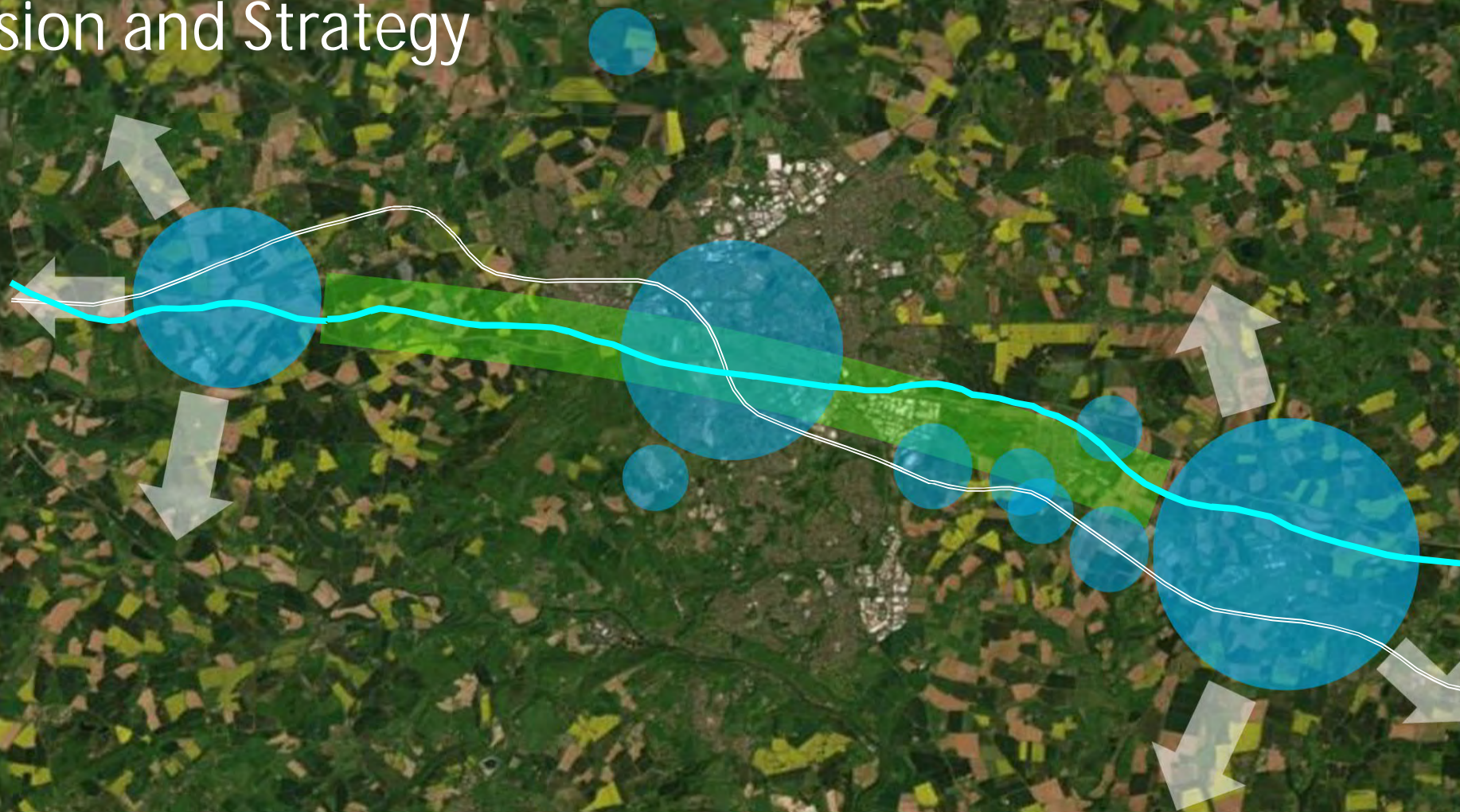
- The potential benefits of the proposed development;
- The issues and impacts which might be generated; and
- Ways in which these might be mitigated or addressed.

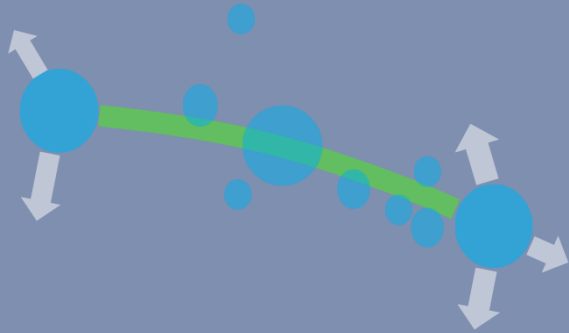
3.28 The further information required includes but is not limited to:

- Assessment of alternative options available to the Black Country for meeting the housing and employment needs arising in the Black Country;
- The outcome of the Black Country Green Belt review;
- Infrastructure capacity assessment to identify key impacts and investment requirements;
- Infrastructure funding;
- The views of neighbouring authorities, Government agencies and major infrastructure providers; and
- Further evidence to support the economic development context.

3.29 Shropshire Council is working with neighbouring authorities and stakeholders to obtain this information and carry out further work.

Shrewsbury – Telford - Wolverhampton Strategic Development Corridor Vision and Strategy





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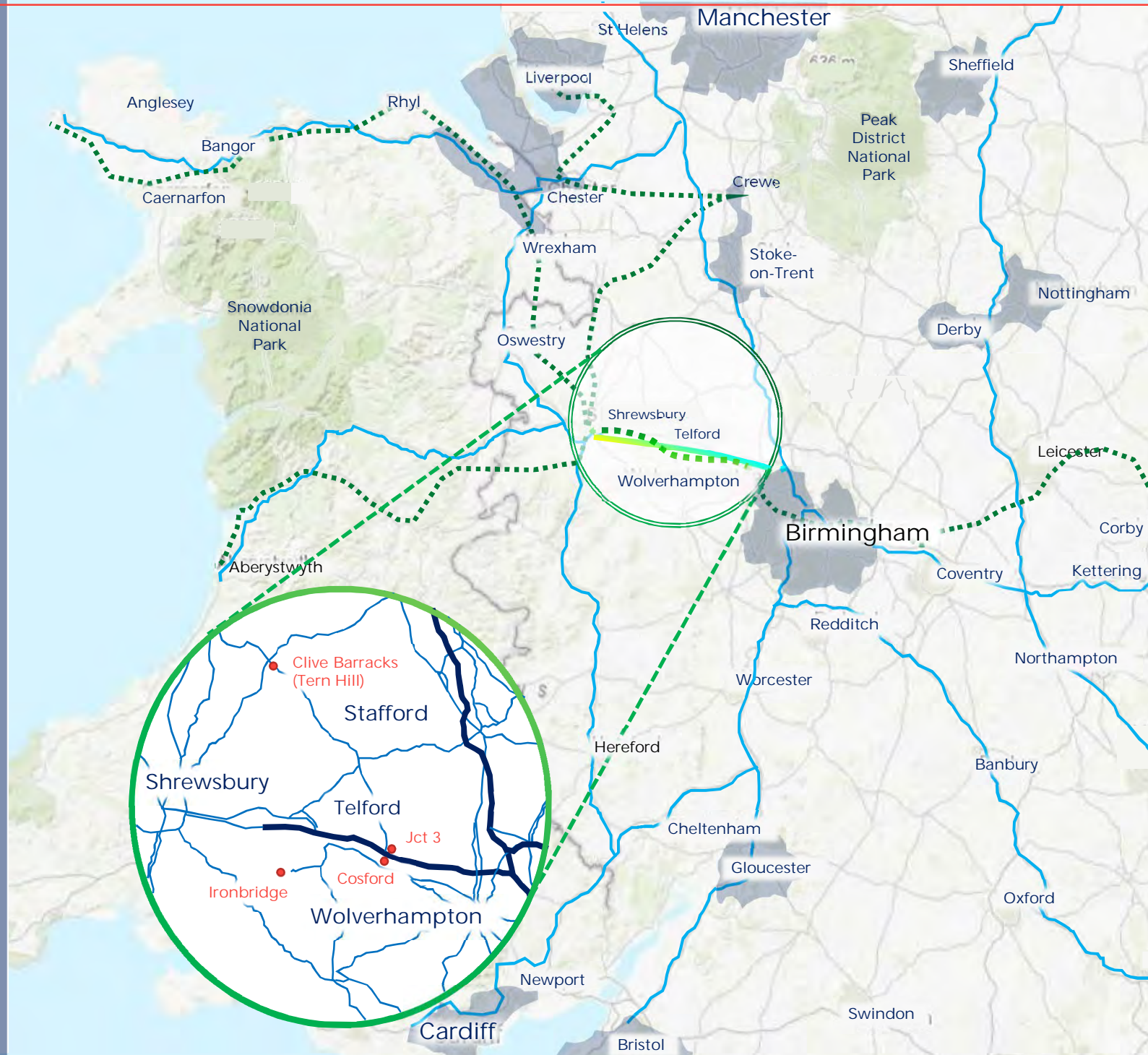
Key Corridor Locations

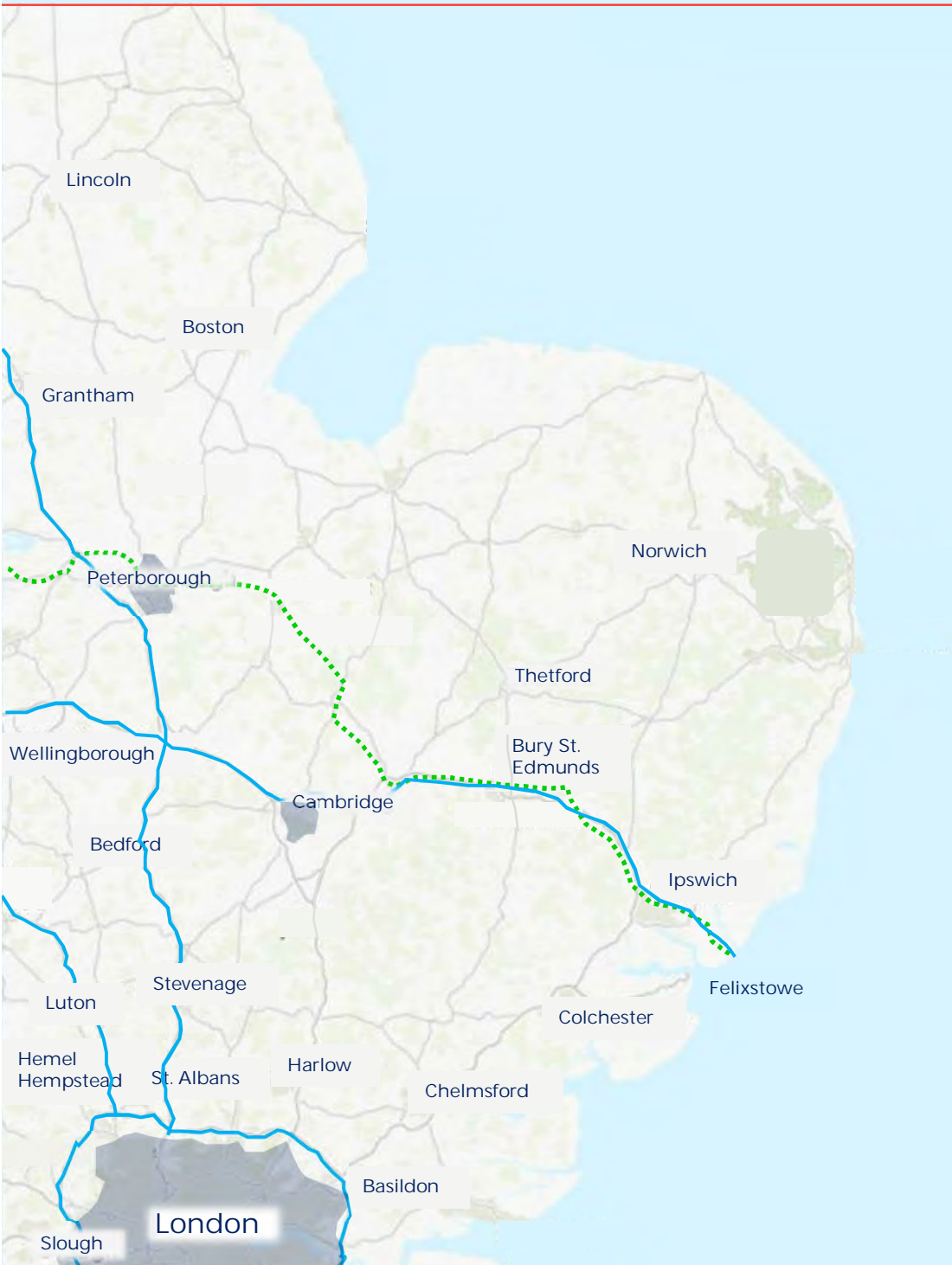
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Introduction

The Shrewsbury - Telford - Wolverhampton Strategic Development Corridor (STWSDC) is a key east-west link between Shropshire and the West Midlands and acts as a major link for both Shropshire and its neighbouring local authorities. The area is identified as a key growth corridor for both employment and residential development within Shropshire's Economic Growth Strategy.

WSP have worked for Shropshire Council to prepare this initial vision document to provide advice on the cumulative infrastructure impact and opportunities related to a series of sites along this corridor. There are four key sites identified for consultation and consideration in the Local Plan Review, namely:

- Ironbridge Power Station (Harworth Estates)
- RAF Cosford and RAF Cosford Museum
- Clive Barracks, Tern Hill (MOD)
- Junction 3, M54 (Bradford Estate Land)

This document analyses the cumulative value of the multiple strategic sites along this well established, multi-modal transport corridor and looks to build on the corridor's existing cross border linkages into Mid-Wales as well as its connections to the West Midlands and the North West of England.

It highlights both the impact and subsequent transport infrastructure interventions possible for the corridor as a whole to ensure that a combined approach yields the best results both locally, regionally and nationally for economic, social and environmental wellbeing. To achieve this, WSP has identified where rail, road, cycling and walking infrastructure could be improved to increase capacity on this strategic level and, consequently, support the identified sites listed above and vice versa.

An opportunity also exists to tackle a number of transport issues that currently contribute to climate change along the corridor. Shropshire Council declared a climate emergency and is preparing a review of their **climate change strategy** over the coming months. Shropshire Council wish to develop a 'collective council response, and to harness all existing activity and strategies' and this document will be able to contribute to this objective.

The STWSDC Opportunity

Shropshire Council has objectives set out to:

- Deliver economic growth and opportunities and support the development of strategic employment locations along the STWSDC;
- Seek improvement and investment in infrastructure to facilitate economic growth along the corridor; and
- To combat climate change by promoting green and sustainable transport.

This is also supported by the Marches Local Enterprise Partnership Shropshire Council has with Shropshire, Herefordshire and Telford & Wrekin Councils which together have recently produced a Strategic Economic Plan and Emerging Local Industrial Strategy for the area.

There are already a number of existing nationally significant sites along the route. Due to the success of developments along the M54 such as i54, T54, RAF Cosford and Lilleshall National Sports and Conferencing Centre the M54/A5 corridor is seen as a desirable area for businesses in nationally important sectors.

Consequently, an opportunity exists to work collaboratively with other local authorities located within the identified study area to deliver a sustainable approach for development, movement and growth along this key route. There exists the opportunity to promote and enhance connectivity between the West Midlands and the strategic sites identified throughout this regionally significant corridor.

Support was given to the idea of focussing any additional supply of employment land to grow employment sectors with greater productivity, such as the Food Manufacturing, Agri-tech, Engineering, Advanced Manufacturing and Environmental Science sectors. With employment comes housing need and the essential requirement for excellent connectivity in a flexible and sustainable manner.

We have an opportunity to pursue a vision that is innovative, locally led and positions the corridor as an attractive location for further investment to complement the regional economy and work with national needs. Furthermore, there is the potential to enhance the green infrastructure along the corridor and improve links to areas such as mid-Wales, the West Midlands and the North West.

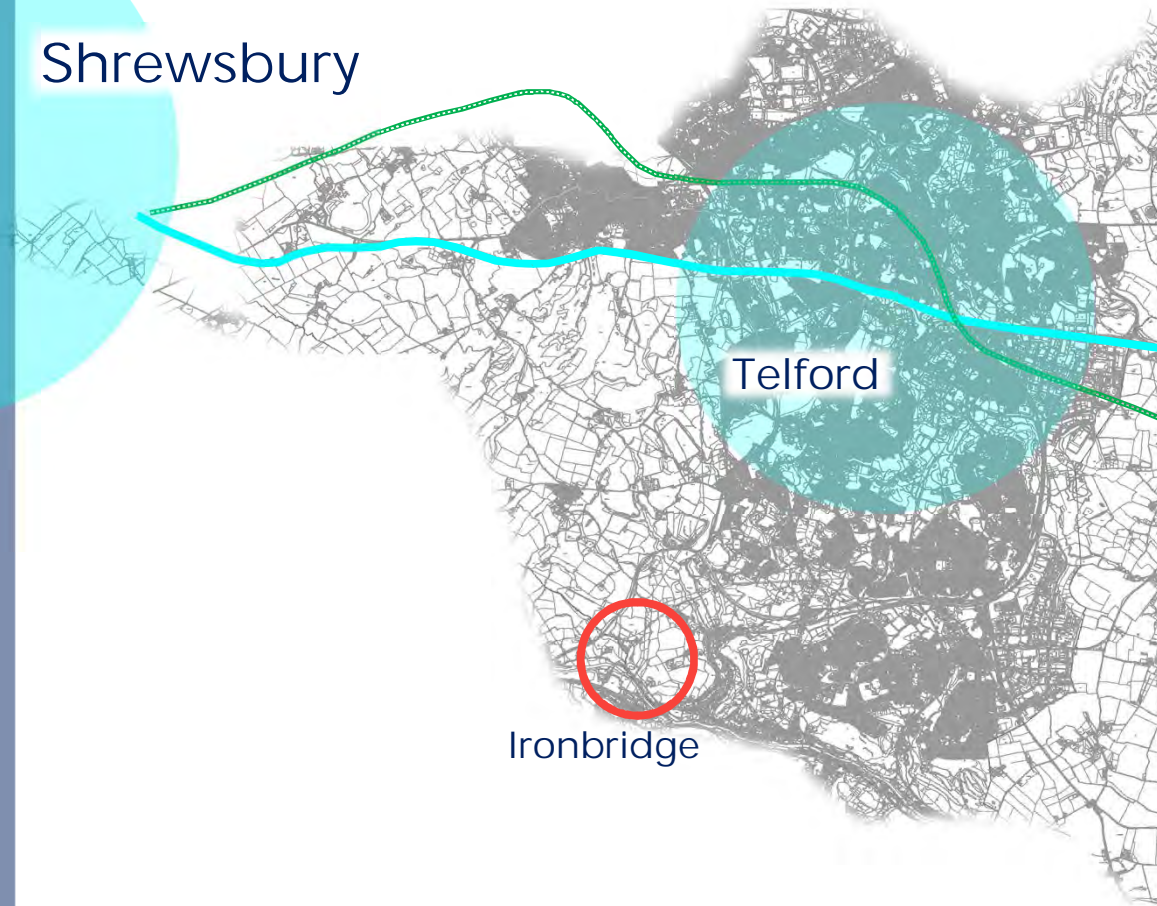


Clive Barracks
(Tern Hill)

Shrewsbury

Telford

Ironbridge



A Strategic Approach

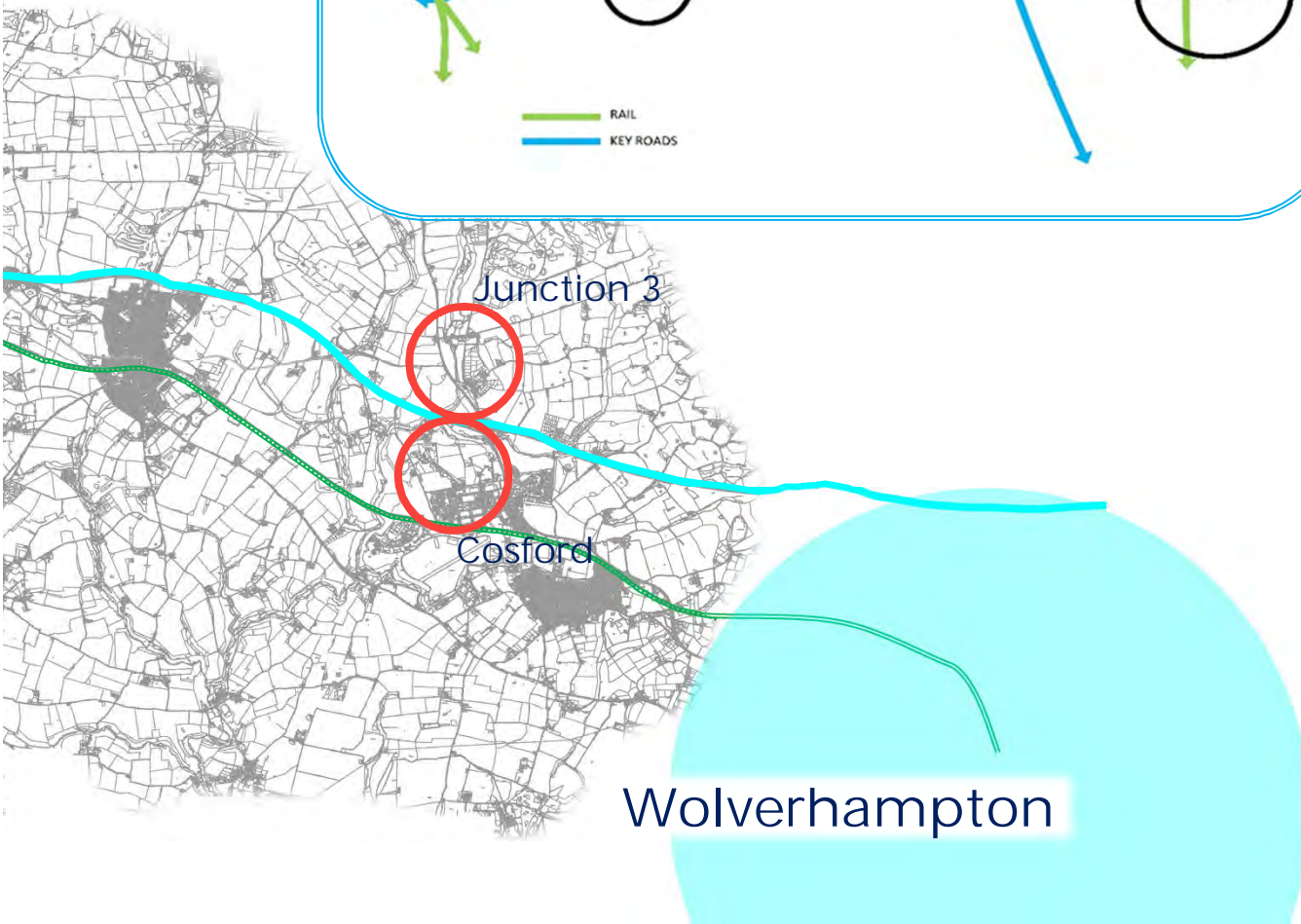
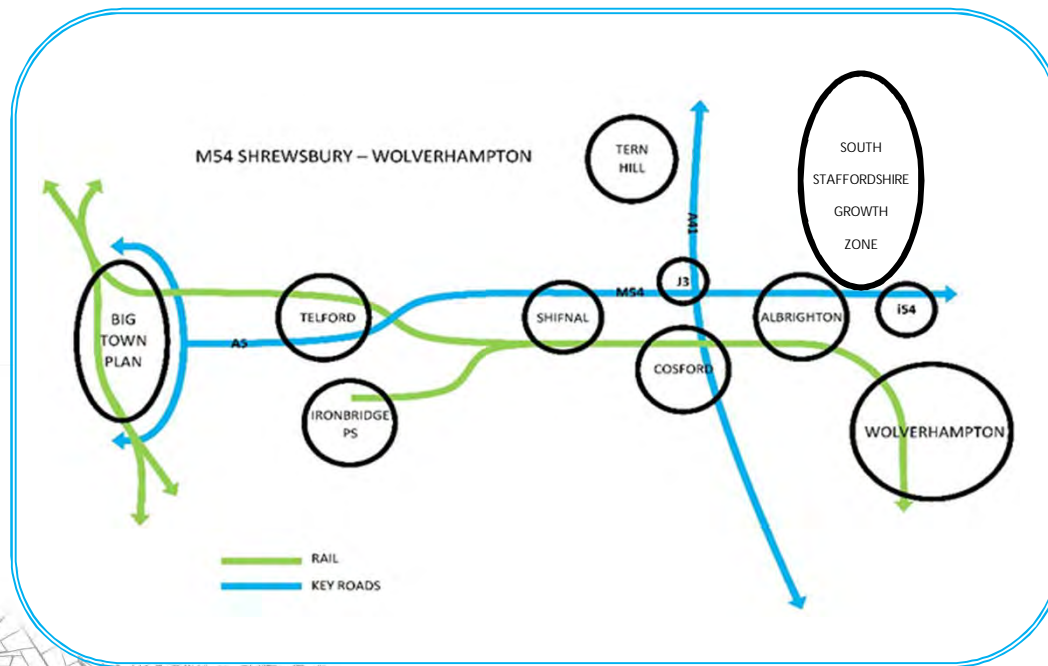
For this collaborative strategy to be successful it has already been established that a 'step change' in economy growth in the area identified will require further investment.

There are a number of infrastructural improvement projects either planned or in the pipeline and with direct or indirect benefits for the corridor. Projects such as the M6/M6 Toll Link, West Midlands Interchange, Shrewsbury North West Relief Road (SNWRR), Birmingham to Shrewsbury rail service capacity improvements and HS2 implementation raise the profile of the STWSDC as a location for investment and support the objectives of the Economic Growth Strategy.

The three strategic sites at Clive Barracks (Tern Hill), Former Ironbridge Power Station and Junction 3 have the potential for around 5000 new dwellings and around 60 hectares of employment land, and at RAF Cosford there are opportunities to enhance and deliver new facilities for international defence and aviation skills training, as well as an expansion of the existing engineering training facilities and the RAF Cosford Museum.

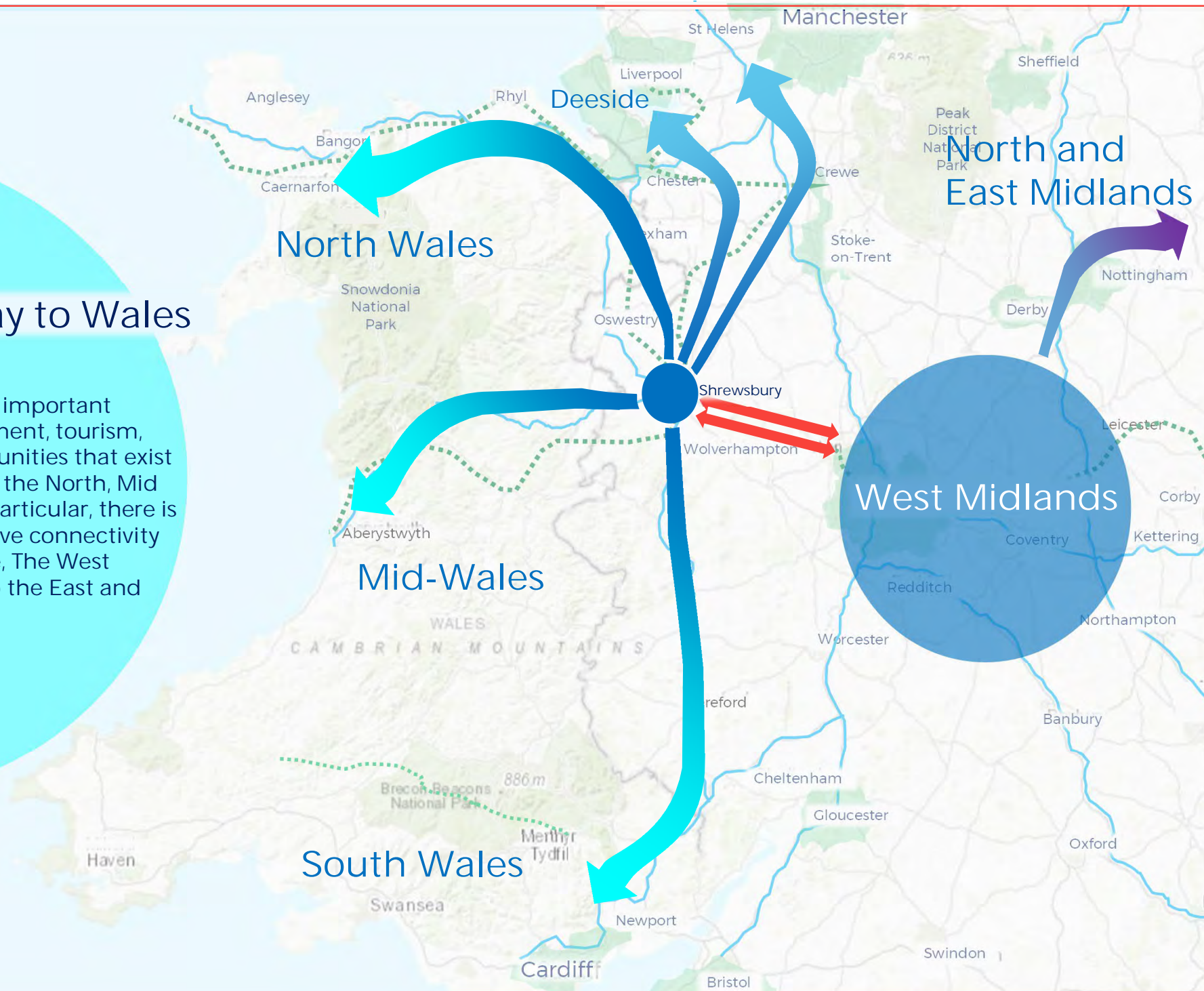
This document considers each at high level and the cumulative benefit that their implementation and delivery can give in terms of stimulating wider opportunities to improve connectivity to make all journeys in the area viable by a range of modes. The primary objective is to improve strategic transport linkages in the wider context for journeys around or under an hour.

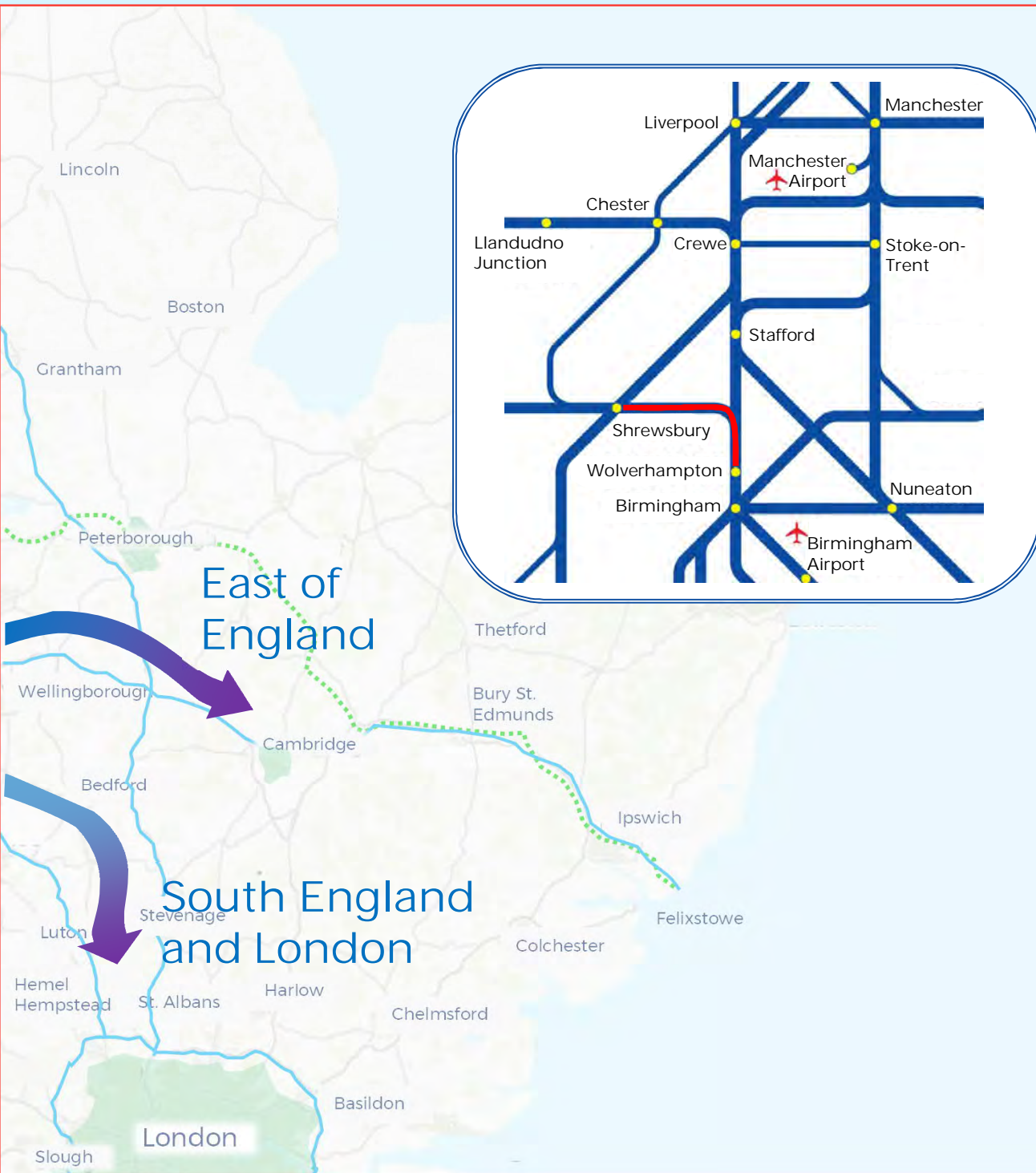
This strategic approach also gives us an opportunity to prepare a plan to mitigate the effects of climate change, in particular by promoting a strategy that encourages carbon reduction.



A Key Gateway to Wales

The STWSDC route is an important gateway to the employment, tourism, leisure and retail opportunities that exist and continue to grow in the North, Mid and South of Wales. In particular, there is an opportunity to improve connectivity between Wales, Deeside, The West Midlands and beyond to the East and South of England.





Capacity improvements to the road/rail links along the STWSDC have the potential to establish better links between a number of strategic locations throughout the country, especially for those journeys that are in a predominantly east-west direction.

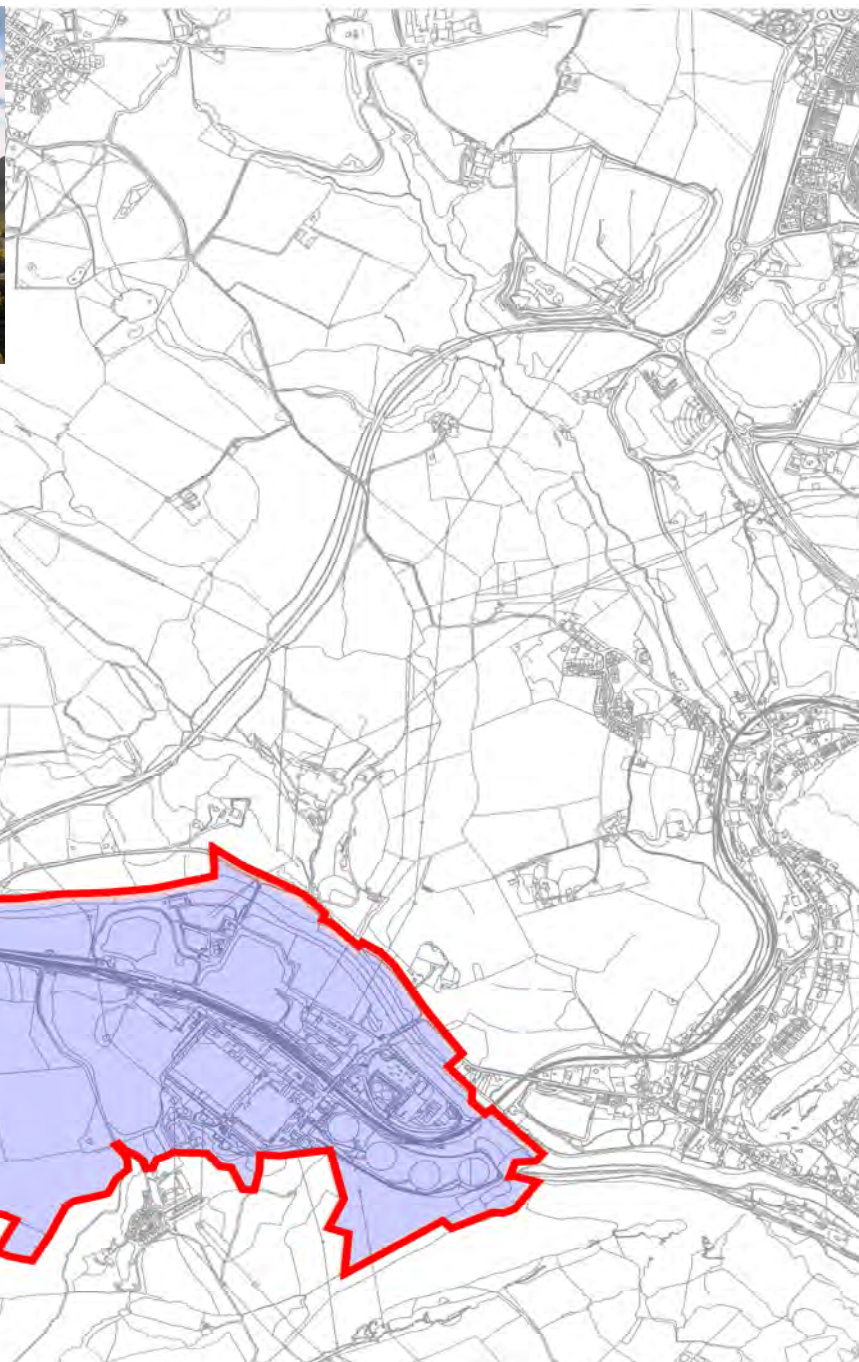
Existing road and rail routes from the Holyhead and Liverpool ports, Deeside (where major employers such as Airbus are located) and strategic places in Wales such as Cardiff, Swansea and Aberystwyth suffer from congestion issues.

Consequently, there is currently a lack of reliability on both the Strategic Road Network (SRN) and the national rail network for many journeys that could potentially use the STWSDC. With an improvement in capacity in both road and rail infrastructure on the STWSDC the prospect exists to improve the resilience on both networks to these employment, retail and leisure locations. This work could also help to support the aspirations Telford and Wrekin Council have to promote the upgrading of junctions 4,5 and 6 on the M54.

The road link along the STWSDC will have its accessibility improved by the implementation of the Shrewsbury North West Relief Road and help to provide an alternative to other traffic route between Wales and the East of England. Rail capacity improvements along the STWSDC have the potential to allow an increased frequency of train services along the route and, subsequently, relieve capacity pressure on existing rail services between Wales, Deeside, Manchester and the West Midlands.

There is the opportunity to provide an alternative route for services such as the Liverpool - Norwich route which currently passes through the Manchester or Crewe Hubs. An alternative service could be provided from Liverpool via the Halton curve along the Shrewsbury - Telford - Wolverhampton line and allow an alternative route for additional services to Birmingham and beyond to locations in the East and South such as Norwich. The STWSDC could become a line complementary to the WCML (West Coast Main Line), even with the implementation of HS2 and could help relieve capacity pressure at the Crewe and Manchester Piccadilly hubs.

Strategic Sites - Ironbridge Power Station



This site has potential to provide an appropriate balance of development 7km south west of Telford, with an early masterplan indicating around 6ha of employment and around 1000 homes together with local services and facilities.

The full project is proposed to be complete within 10 to 15 years and requires a considerable amount of sand and pulverised ash to be removed off site beforehand. To achieve this, investigations are being made into re-opening the existing rail line to the site, with services to Telford in particular, as well as Shifnal, Wolverhampton and Birmingham.

Strategic Opportunities

Initial assessment has shown that the site's sustainable development may require improvements to its accessibility by a range of modes. An opportunity exists to develop the existing rail alignment into a passenger service from the new village centre that links into existing services, possibly at Shifnal Rail Station. This service has the potential to improve connectivity to Shifnal and Telford once the local infrastructure impacts are fully understood and solutions identified. A green travel plan could also help to identify the benefits of using the existing rail alignments as cycle tracks or as reinstated rail lines with services to Shrewsbury. A range of proposals are coming forward, including a retirement village, a local centre, leisure, education facilities and significant green infrastructure such as allotments. It should be noted that the National Grid and Western Power Distribution substations and equipment are to be retained on site.

Key Opportunities

- Track improvements to allow passenger shuttle services between Shifnal and Ironbridge;
- New passenger station on Power Station site;
- Improvements to Albert Edward Bridge;
- Cycle link from Ironbridge to Shrewsbury using existing rail alignment, possible rail conversion;
- Green Travel plan for the site;
- This site has potential to offer a mixed-use development providing employment and more than 1000 homes together with local services and facilities.

Strategic Sites - Clive Barracks (Tern Hill)



Clive Barracks (Tern Hill), is expected to be vacant by 2025. The 50 ha site on the A41 has the potential to bring new employment opportunities and approximately 750 residential units to the area.

The site is located adjacent to the A41/A53 crossroads near Market Drayton and, consequently, benefits from good local transport links to Stoke-on-Trent, Shrewsbury, the M54 and the M6.

Strategic Opportunities

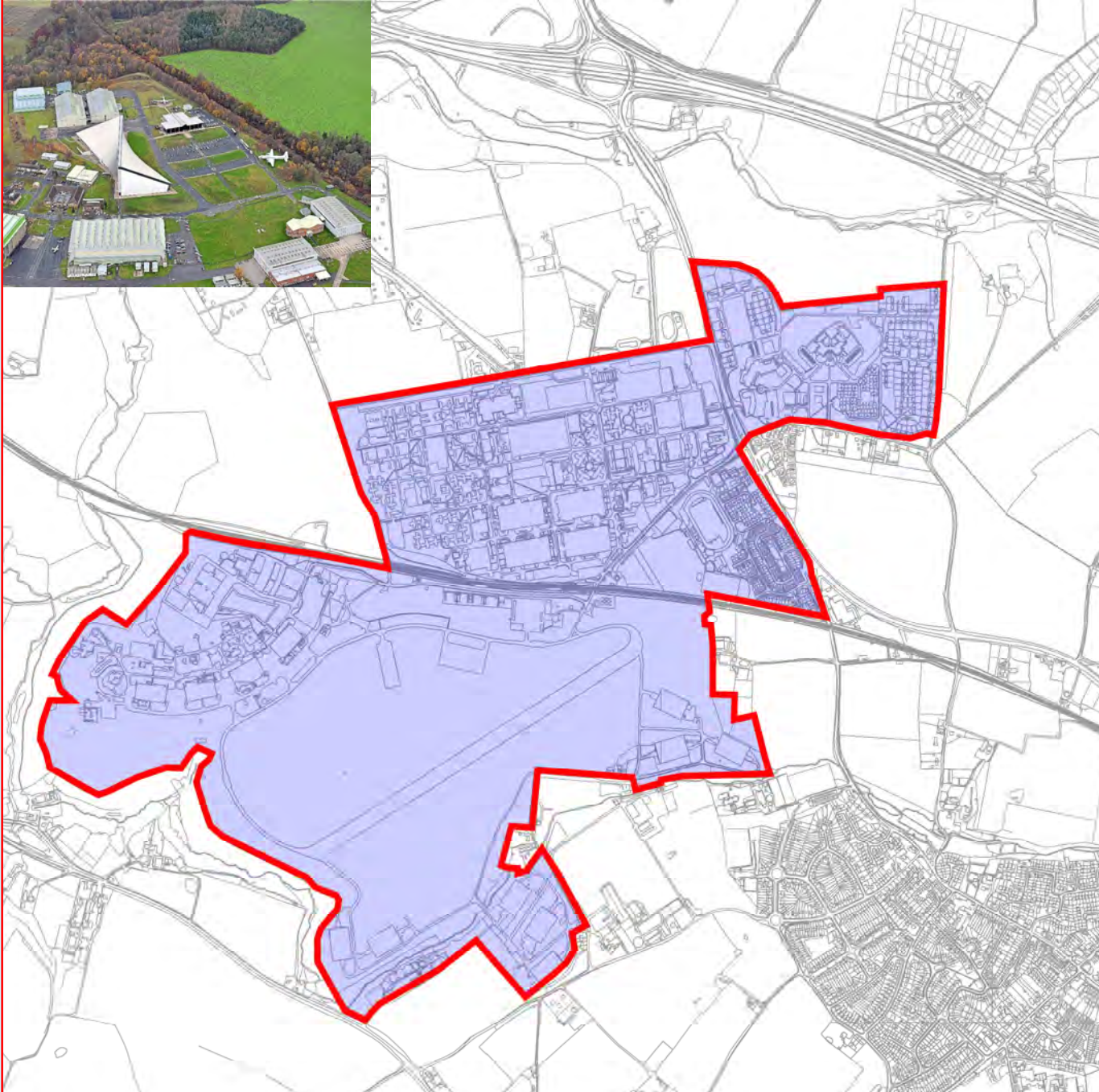
The Strategic Road Network can be accessed to/from the site via Jct 3 on the M54. Consequently, improvements to the configuration and capacity of the junction may be required to cater for the growth in traffic movements to the site. Improvements to public transport access are important for a site such as Clive Barracks (Tern Hill), especially bus links that allow convenient high frequency services to local rail services at Cosford Rail Station. Planned capacity improvements at Cosford Rail Station could also then be accessed more easily.

Acknowledging that the site straddles the A41, connectivity between the two halves via sustainable travel such as bicycle routes, electric buses, and electric autonomous vehicles for localised journeys. A Green Travel Plan for the site would help to support these opportunities, with solutions arrived at via consultation with local community representatives.

Key Opportunities

- M54 Junction 3 upgrade to improve access to the Strategic Road Network;
- Upgrading bus services between the site and Cosford Rail Station;
- Cosford Rail Station upgrade;
- Green Travel plan for the site.

Strategic Sites-Cosford(MOD and Museum)



RAF Cosford is located close to Cosford Village and extends to circa 250 hectares. It is located to the west of Albrighton and south of Junction 3 of the M54 with direct access to Cosford train station providing regular train links between Shrewsbury and Wolverhampton. RAF Cosford is recognised as a major developed site within the adopted Shropshire Local Plan.

In conjunction with the training centre, there are around 2,750 people employed in or around the site, as students or as staff. There is potential for this number to increase in the future with more military staff on site, maybe as high as 4,000 personnel. There has also been growth in tourism at the site especially associated with the annual air show and there have been plans proposed to establish a £40m STEM hub on site (The Whittle Engineering Academy).

Strategic Opportunities

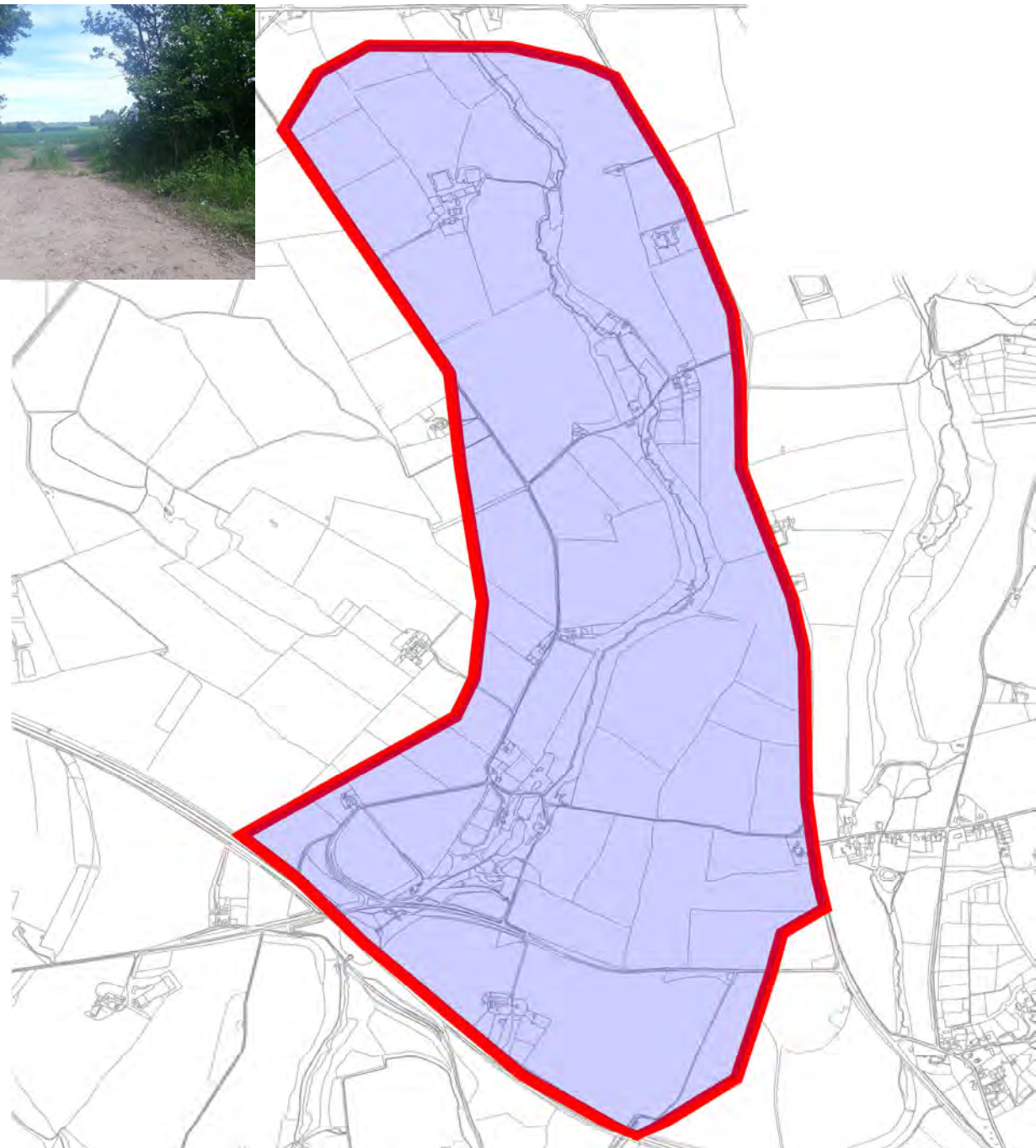
Jct 3 on the STWSDC acts as the main gateway to the Strategic Road Network and is likely to require improvement to cater for the additional traffic from the site following its development. As well as the opportunities identified in the emerging Shropshire Local Plan there is the possibility of developing the air freight capacity at the site.

However, particular emphasis should also be made to improve the links for other modes. This can be achieved by improving accessibility and facilities at Cosford Rail Station for all passengers and can be supported by preparing Green Travel Plans for the site and Albrighton.

Key Opportunities

- Maintain aviation capability at RAF Cosford;
- M54 Junction 3 Upgrade;
- Green Travel plan for the site and Albrighton;
- Cosford Rail Station upgrade.

Strategic Sites - Junction 3



The A41/M54 Junction 3 site along Newport Road is being promoted to Shropshire Council and is currently being considered by the Council as a potential strategic site for inclusion in the Shropshire Local Plan Review. It has the potential to form a high quality new settlement to accommodate a range of uses.

The most recent proposals are for the construction of a strategic employment site of around 50ha; accompanied by around 3,000 homes; and a local centre to provide services and infrastructure, as part of a planned settlement. The proposals are focused on land to the north of Junction 3 of the M54 and west of the A41.

Strategic Opportunities

As proposed for the Clive Barracks (Tern Hill) and Cosford sites, upgrading of Junction 3 of the M54 will provide significant benefits for this site in highway capacity terms. Improvements to public transport links between the site and Cosford Rail Station would also improve the sustainability of the site. This could allow the site to gain further benefit from access and capacity improvements at Cosford Rail Station as well.

In order to assess and support these proposals, it would also be beneficial to prepare a green travel plan for the site and consider it alongside a similar travel plan for the Cosford site. The travel plan would outline the innovative ways in which the site will be connected to the local region and strategic corridor, including the wide use of electric buses, electric autonomous vehicles, and widespread sustainable transport links such as high quality cycle links to strategic areas such as Cosford and Shifnal.

Key Opportunities

- M54 Junction 3 Upgrade;
- Upgrading bus services between the site and Cosford Rail Station;
- Green Travel plan for the site;
- Cosford Rail Station upgrade.

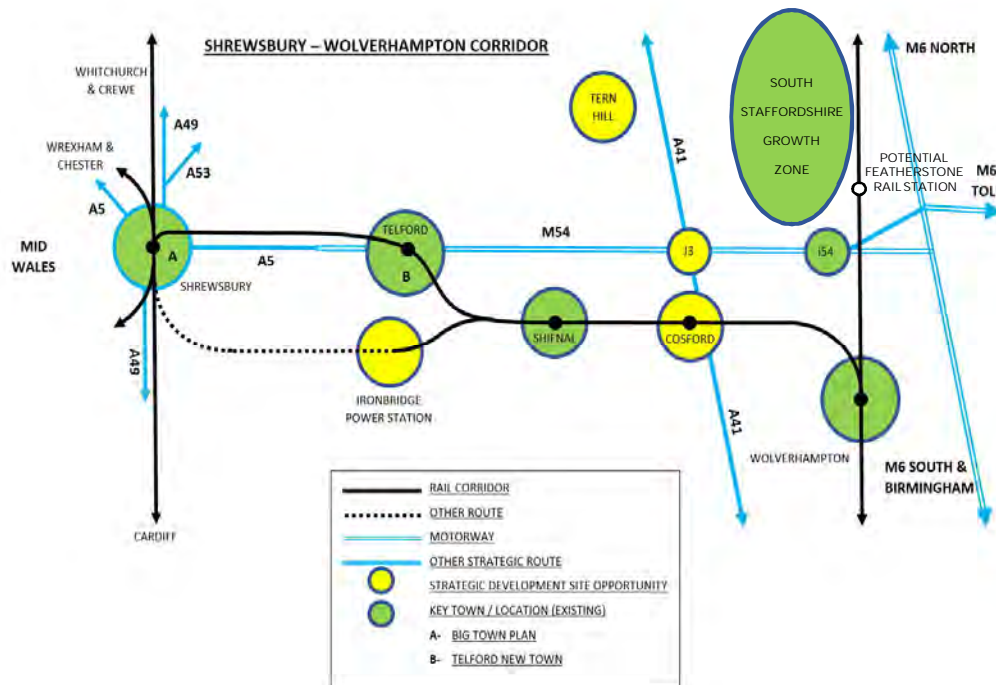
Existing Corridor Strengths and Issues

The size, location and nature of the strategic sites described above give us an opportunity to investigate what transport infrastructure improvements are necessary and where transport accessibility and capacity improvements could be achieved at specific transport locations along the STWSDC. By considering the sites together there is also an opportunity to consider carbon reduction strategies along the corridor as one and tackle climate change on a strategic scale.

Following site visit assessments at transport facilities along the length of the STWSDC route it has been possible to determine where transport improvements are required and achievable in order to determine what form they should take.

This section provides a summary of the findings at each of the locations identified and gives an explanation of where, subject to further investigation, improvements in transport capacity are possible.

Following an assessment of the corridor a number of key issues have been identified that should be the focus of any transport improvements.



The Existing Strategic Corridor Summary

There is an over-reliance on the use of the private vehicle along the STWSDC;

Improvements in rail service frequencies and speeds along the corridor are required to improve existing services and allow the potential for future additional services;

Rail connectivity at both ends of the corridor, at Shrewsbury and Wolverhampton, require improvement to result in better integration with other existing and future rail services, such as HS2, and aid connection to other parts of the country;

Limited station platform lengths at key rail hubs prevents the potential to use longer trains and increase capacity;

Existing rail hubs require upgrades to improve facilities for pedestrian and cyclists and should comply with the Disability Discrimination Act;

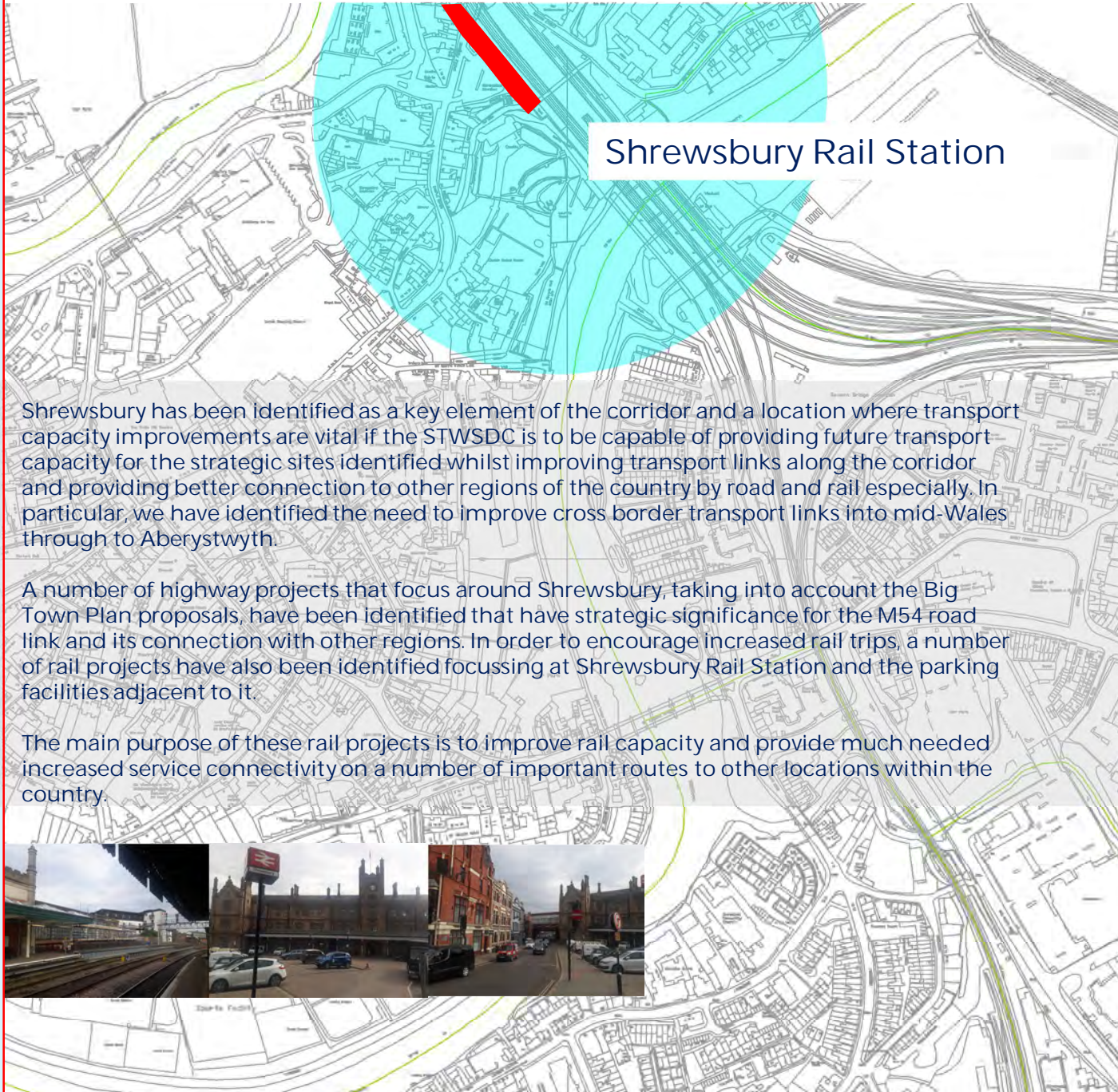
Conflict between existing local and express rail services along the route exist due to a lack of rail capacity;

Rail services lack cohesion, are difficult to market due to more than one operator;

Opportunity to enhance connectivity between rail hubs and places along the corridor, especially for pedestrians and cyclists, thus improving the green infrastructure available for all users and allow a shift to more sustainable modes; and

Lack of wider connectivity to development sites and places along the corridor.

Shrewsbury Issues and Opportunities



Shrewsbury has been identified as a key element of the corridor and a location where transport capacity improvements are vital if the STWSDC is to be capable of providing future transport capacity for the strategic sites identified whilst improving transport links along the corridor and providing better connection to other regions of the country by road and rail especially. In particular, we have identified the need to improve cross border transport links into mid-Wales through to Aberystwyth.

A number of highway projects that focus around Shrewsbury, taking into account the Big Town Plan proposals, have been identified that have strategic significance for the M54 road link and its connection with other regions. In order to encourage increased rail trips, a number of rail projects have also been identified focussing at Shrewsbury Rail Station and the parking facilities adjacent to it.

The main purpose of these rail projects is to improve rail capacity and provide much needed increased service connectivity on a number of important routes to other locations within the country.

Summary of Shrewsbury Highway Projects
Implementation of the Shrewsbury North West Relief Road;

Extension of the M54 to the Shrewsbury North West Relief Road to replace the non strategic status of the A5;

Improvements to the A5 between Shrewsbury and Wales;

Proposals for a park and ride location at Preston Boats combined with an adjacent bus/coach station. This facility can act as a terminal for a bus/coach service running from Shrewsbury to Wolverhampton along the STWSDC.

Summary of Shrewsbury Rail Projects
An upgrade of Shrewsbury Rail Station, including improvements to the car parking areas, as part of the Big Town Plan will unlock a number of proposals, including:

Capacity improvements for the Wolverhampton - Shrewsbury - Crewe - Chester - Liverpool Rail link;

Proposed electrification of the line between Shrewsbury and Wolverhampton;

Proposed electrification of the Shrewsbury to mid-Wales line;

The possibility of reinstating rail links between Shrewsbury and Stafford;

The implementation of a cycle link between Ironbridge and Shrewsbury along the old rail link up to the Severn Valley, with the potential to be converted back to a rail line in the future.

Key Corridor Locations

Shifnal



Shifnal has undergone significant housing growth in recent years. This growth has put significant pressure on the existing local infrastructure. This is particularly noticeable at Shifnal Town Centre's parking facilities and the rail station.

Shifnal Rail Station also suffers from a lack of service frequency running through the station despite significant amounts of commuter movements identified and the station could be better integrated into the town centre to improve accessibility for all users. Proposals identified to tackle these issues include:

An opportunity exists to introduce a rail shuttle service between Shifnal and Ironbridge to increase rail capacity. This implementation is likely to require additional improvements to Shifnal Rail Station, including:

Increasing platform lengths (to allow longer trains to arrive at the station).

Improving access to the town centre, making the station DDA compliant and prepare a Green Travel Plan to inform the project

Improving and increasing the capacity of parking facilities.



Cosford Rail Station



Cosford Rail Station has the potential to be a significant rail hub for a number of different locations and sites within the STWSDC, including RAF Cosford, Clive Barracks (Tern Hill) and Junction 3 sites. If this is to be achieved public transport links to Cosford Rail Station will need to improve.

There is a lack of capacity at Cosford Rail Station and the station could be better integrated with the RAF Cosford site to improve links and facilities, for pedestrians and cyclists in particular. Proposals identified to tackle these issues include:

Introduction of a shuttle bus between strategic sites and Cosford;

Improved pedestrian and cycling links from the RAF Cosford Museum and the rail station;

Implementation of a rail station upgrade, including:

Increasing platform lengths (to allow longer trains to arrive at the station);

Making the station DDA compliant for those with impaired mobility through wayfinding, tactile paving, induction loops and making the platforms wheelchair accessible, and preparing a Green Travel Plan combining the rail station and the RAF Cosford site;

Improving and increasing the capacity of parking facilities.

Key Corridor Locations

Albrighton



Albrighton Rail Station is a smaller rail hub that currently suffers from a lack of frequency rail services as is the case along much of the STWSDC.

However, it is the lack of platform capacity and access facilities at the rail station that cause Albrighton to have an excess of capacity issues, especially on weekdays. There is no designated parking available at the station even though a significant amount of informal parking takes place adjacent to the station. Like a number of the other stations discussed here, the station is also not DDA compliant.

Proposals identified to tackle these issues include:

Increasing platform lengths (to allow longer trains to arrive at the station).

Improving access to the station, making the station DDA compliant and prepare a Green Travel Plan to inform the project;

Investigate the possibility of introducing designated parking facilities to the site.



Wolverhampton Rail Station



As well as the opportunities for transport connectivity improvement at Shifnal, Cosford and Albrighton it is important to note the proposals that have already begun and are soon to be completed. The new state of the art Wolverhampton Railway Station building to serve the city will be fully open in summer 2020.

Wolverhampton station is being comprehensively redeveloped, including an extension of the Midland Metro tram system, ticket gates, and transfer of operator to WMT (which has already taken place).

The effect of this should be to improve the attractiveness of the station as a destination and for interchange, and in increase in revenue to support future development.

West Midland Trains also plans to replace the fleet of Class 170 trains it uses on the route. The new trains are expected to have higher seating capacity on a number of regular services, including:

Services to London, Edinburgh, Glasgow, Manchester, Crewe, Bournemouth, Exeter, Birmingham, Shrewsbury, and Liverpool

Key Transport Issues Summary - Road

Issue	Possible solution	Constraint
Congestion, peak spreading and slow journey times	Identify sections where there is the possibility to increase link capacity	Funding/ National Policy
Unbalanced Commuter Patterns	Improved mix of development in each town/city - Shifnal and Cosford as examples	National Policy/Lack of Funding
Junction Capacity Issues	Improvements to Junction Capacity at key points close to potential development sites	Land requirements/Funding
Severance/Accessibility Issues for Cyclists/Pedestrians	Improve accessibility for all users at key development sites to improve sustainable modes	Unlikely to be a funding priority
Future Development reliant on access to the M54	Travel Plan Strategy for Future Development encouraging modal shift to rail in particular as well as cycling/by foot	
M54 currently has a concrete surface	Replace with tarmac to Highways England standard	Highway England Programme
Lack of cycle/pedestrian facilities to allow modal shift	Modal shift to cycling especially with improved cycle infrastructure in key areas	Land requirements/Funding
Future access to HS2	Gain further understanding of HS2 review and determine where connections could be achieved	National Policy

Key Transport Issues Summary - Rail

Issue	High level solution	Constraint
Slow journeys	Introduce more higher speed trains to the route	Calling pattern limits the benefit except for fastest trains. Line speeds would need to be improved
Slow journeys	Fewer station calls for some higher speed services	Impact on existing passengers. Mix of services and lack of overtaking opportunities limits the benefit
Lack of rail capacity to allow modal shift	Install passing loops along the route to allow better integration of local and fast services along the route	See above regarding rail capacity issues
Crowding/Unbalanced Commuter Patterns	Longer trains require to reduce congestion at stations	Short platforms
Crowding/Unbalanced Commuter Patterns	Higher frequency of trains on the route to increase capacity	Lack of capacity due to service mix, intensity of use Wolverhampton-Birmingham
Lack of through trains to other destinations	Service extensions beyond Shrewsbury and Wolverhampton	Lack of electrification for more trains to London
Lack of access to the railway	Station accessibility improvements to DDA standard	Funding. VFM by comparison with demand at busier locations
Lack of access to the railway	Increase station car parking	Land availability (and cost of acquisition)
Lack of access to the railway	Additional stations	Impact on journey times for existing customers, and faster trains
Lack of access to the railway	New or reopened lines	Funding and value for money analysis needs to be considered carefully
Poor station environments	New station facilities	Old and listed station buildings, funding
Confused branding	Single operator for all trains on the route	Impact on existing passengers if calls removed on longer distance trains. Lack of capacity to run more trains
Future access to HS2	Dialogue through Midlands Connect and Constellation Partnership to establish options and considerations	

Benchmarking

Following assessment of the current transport conditions, services and issues along the corridor the next stage involves the identification of opportunities and projects where current transport conditions can be improved.

As part of the process, WSP has researched other areas of the country where multi-modal transport corridor improvements have been planned and implemented.

Chester - Warrington - Manchester Corridor

The Chester - Warrington - Manchester Corridor was commissioned to achieve a number of identified regional and national rail connectivity objectives:

- Enable economic regeneration and development in a manner that maximises achievement of sustainability objectives;
- Enhance accessibility and in particular to areas served by the corridor suffering from social exclusion including Merseyside, east Manchester, Halton and Ellesmere Port and Neston;
- Enhance the image of the M56 transport corridor and provide high environmental and design quality; and
- Management of natural, built and historic environment within the M56 transport corridor.

The M56 Corridor is served by a number of railway lines each performing different roles. The West Coast Main Line runs south-north through the study area with a branch off towards Runcorn and Liverpool: stations are located at Warrington Bank Quay and Runcorn within the study area giving access to Virgin West Coast services towards London and the borders/Scotland. This important route is subject to major improvements as part of the West Coast Main Line upgrade with new tilting trains and line speed improvements.

Cambridge - Milton Keynes - Oxford Corridor

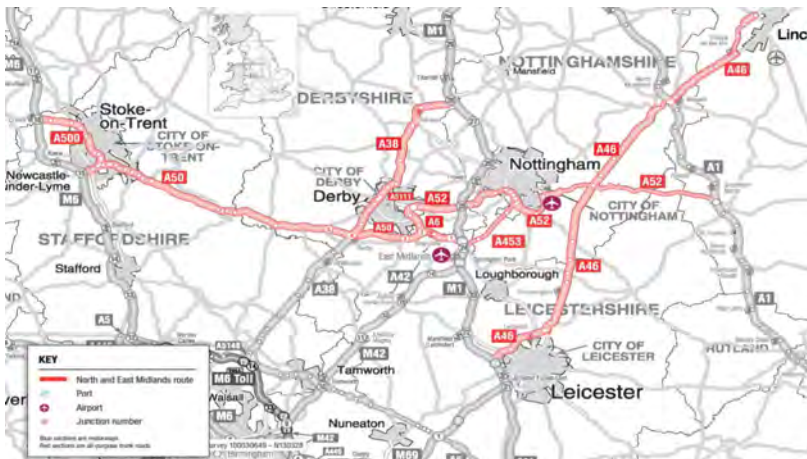


The Cambridge - Milton Keynes - Oxford Corridor was commissioned to:

- Complete 'missing links' within the national rail and road networks;
- Improve resilience by connecting radial routes from London;
- Provide relief to congested routes in the south-east and midlands, and
- Enable wholly new connections between England's towns and cities, ports and airports.

Projects central to achieving this vision include completion of the new East-West Rail line connecting Oxford and Cambridge by 2030 and accelerating the development and construction of the Oxford-Cambridge Expressway. In the short term, new rail services to Cowley in South East Oxford by 2019 and the opening of a new station at South Cambridge by 2022

North and East Midlands Route Strategy

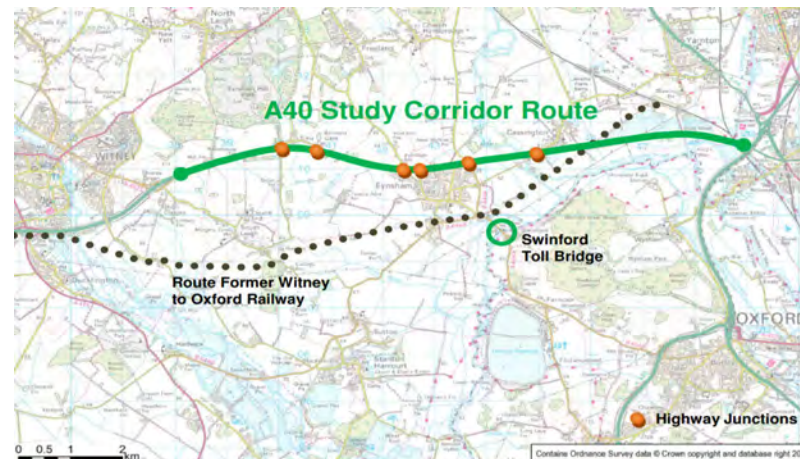


The North and East Midlands Route Strategy encompassed the following objectives:

- Economic growth and the SRN - an evidence review of the relationship between transport investment and economic growth
- Commercial development - an assessment of the relationship between the main property sectors and the SRN
- International gateways - a review of principal international gateways (ports and airports) and their contribution to the economy

Socio-economic analysis and future forecasts - mapping of socio-economic data (population, deprivation and employment) and sectoral forecasts up to 2030. This included identification of the likely growth forecasts for all sectors with a particular focus on those sectors heavily dependent on the SRN.

A40 Witney - Oxford Corridor



The study area focuses on the length of A40 that stretches between the dual carriageway and Wolvercote Bridge and also considers the route of the old Oxford to Witney railway line,

The Overall the study concentrates on three main topic headings:

- A40 Road Solutions - bus lanes/ guided bus, dual carriageway, tidal flow etc.
- Rail Solutions - Heavy Rail and possibly Tram or use of old rail line for guided bus; and
- Other supporting infrastructure or alternatives - P&R, LRT, PRT etc.

The STWSDC Study is of a similar significance to the corridor strategy examples shown here. It is an important opportunity for the area as a whole and, in particular, can help to unlock the potential for planned employment and housing growth be allowed a cumulative approach as has been achieved with these exemplars. [The following opportunities have been identified to achieve this.](#)

Schemes Opportunities

Number	Category	Scheme	Aim	Scheme Benefits	Indicative Costs
1	Rail / Road	Park and Ride at Preston Boats	Strategic intercept & potential hub for coaches	All	£10M
2	Public Realm	Shifnal Town Centre Public Realm & Placemaking	Town Centre upgrade to create new centre for expanded town and as a hub on network	Existing / Ironbridge	£10M
3	Road	M54-A5/M6 Toll Link	New link to/from east	All	£200M*
4	Road	M54 J3 Upgrade	Create capacity and clarity onto M54 around	Cosford / Clive Barracks (Tern Hill) / Bradford	£10M
5	Road	Shrewsbury North West Relief Road	New Relief Route around Shrewsbury	All	£71M*
6	Road	A5 into Wales (Shrewsbury - Holyhead Link)	Create upgrade from Shrewsbury Westwards into Wales	All	£40M
7	Road	M54 ITS - Information management/towards Smart Motorway	Provide greater information for customers along the M54 corridor, to bring the level of information up to same level as wider Highways England Network in West Midlands.	All	£10M
8	Road	M54 Extension to Shrewsbury	Extend the M54 from Telford to Shrewsbury, upgrading the current A road status. Likely to be primarily related to signing and information. Provides significant correlation and perception benefits of one corridor	All	£50M
9	Road / Sustainability	Lamledge Lane Shifnal	Access road and other accessibility upgrades to facilitate future employment land. Provide additional infrastructure to make road network more suitable for employment land release. Junction and carriageway improvements locally.	Existing	£15M
10	Sustainability	Cycle Link Ironbridge west to Shrewsbury	Open up early route from Ironbridge PS to Shrewsbury	Ironbridge	£5-10M
11	Sustainability	Green Travel in Shifnal	Provide package of walking and cycling measures in and around Shifnal	All	£1-2M
12	Sustainability	Green Travel in Albrighton	Provide package of walking and cycling measures in and around Albrighton.	Cosford & M54 J3 site	£1-2M
13	Sustainability	Green Travel in and around New Sites	Provide advanced walking and cycling packages beyond what would normally be expected from development under Highways Development control to make them exemplar locations (4 strategic sites)	All	£1-2M
14	Sustainability	RAF Cosford Museum Links	Pedestrian/Wayfinding and cycle links to improve the visitor experience between flagship attraction and station. Currently unattractive.	Cosford	£5M

Number	Category	Scheme	Aim	Scheme Benefits	Indicative Cost
15	Local PT	Cosford - Station - Bradford Estates Shuttle Route	Link to rail network and between locations	Bradford / Cosford	£2-5M
16	Local PT	Crewe/Market Drayton - Clive Barracks (Tern Hill) to Cosford Link	Bus Service Upgrades to provide core linkages from Clive Barracks (Tern Hill) to Rail Network	Clive Barracks (Tern Hill) / Cosford / Bradford	£2-5M
17	PT	Strategic Coach connectivity	Combi-coach links along corridor ('Oxford Tube/North Kent') style options	All	£5M
18	Rail	Electrification of Rail from Wolverhampton - Shrewsbury	Create more efficient and sustainable services locally and for through trains from London/West Midlands to Telford/Shrewsbury/Mid & North Wales. Resilience required during HS2/WCML works	All	£75M
19	Rail	Albrighton Station Upgrade - Platform length, DDA, Parking	Upgrade as part of line programme	Existing	£2.5-4M
20	Rail	Cosford Station Upgrade - Platform length, DDA, Parking	Upgrade as part of line programme	Bradford / Cosford	£2.5 - 4M
21	Rail	Shifnal Station Upgrade - Platform length, DDA, Parking	Upgrade as part of line programme	Ironbridge / All / Existing	£2.5 - 4M
22	Rail	Albert Edward Bridge & Ironbridge - Shifnal Track works	Upgrade rail infrastructure to make line operational	Ironbridge	£5M
23	Rail	Ironbridge Power Station to Shifnal Shuttle Service including turnaround and intermediate stations	New Rail links to development and south side of Telford	Ironbridge	£10-20M
24	Rail	Wolverhampton Station	Rail hub onto WCML and into West Midlands	All	Already on site
25	Rail	Mid Wales Lines Electrification	Upgrade Shrewsbury Westwards	All	£50-100M
26	Rail	Shrewsbury Station	Upgrade Shrewsbury - Big Town Plan station improvement	All	£5 - 10M
27	Rail	Wolverhampton - Shrewsbury - Crewe / Chester / Liverpool Rail link	New Services north from Shrewsbury	All	Revenue costs
28	Rail	Convert 10 to rail service/line	New service Ironbridge to Shrewsbury (extra capacity at western end of corridor)	Ironbridge / All	£30M
29	Rail	Passing loop installations	Likely to be in Cosford area to increase flexibility - study needed	All	£10M

Phasing

Scheme	Short Term (within 5 years)	Medium Term (5-10 years)	Long Term (10 years +)
Park and Ride Preston Boats	Yellow	Light Green	Light Green
Shifnal Town Centre Placemaking and Public Realm	Yellow	Light Green	Light Green
M54-A5/M6 Toll Link	Light Green	Green	Dark Blue
M54 J3 Upgrade	Yellow	Green	Light Green
Shrewsbury North West Relief Road	Yellow	Green	Light Green
A5 into Wales (Shrewsbury - Holyhead Link)	Light Green	Light Green	Dark Blue
M54 ITS - Information management/towards Smart Motorway	Light Green	Light Green	Dark Blue
M54 Extension to Shrewsbury	Light Green	Light Green	Dark Blue
Lamledge Lane Shifnal	Light Green	Green	Light Green
Cycle Link Ironbridge west to Shrewsbury	Light Green	Green	Light Green
Green Travel in Shifnal	Yellow	Light Green	Light Green
Green Travel in Albrighton	Yellow	Light Green	Light Green
Green Travel in and around New Sites	Light Green	Green	Light Green
RAF Cosford Museum Links	Yellow	Light Green	Light Green
Cosford - Station - Bradford Estates Shuttle Route	Light Green	Green	Light Green
Crewe/Market Drayton - Clive Barracks (Tern Hill) to Cosford Link	Light Green	Green	Light Green
Strategic Coach connectivity	Light Green	Light Green	Dark Blue
Electricification of Rail Wolverhampton - Shrewsbury	Light Green	Light Green	Dark Blue
Albrighton Station Upgrade - Platform length, DDA, Parking	Yellow	Light Green	Light Green
Cosford Station Upgrade - Platform length, DDA, Parking	Yellow	Light Green	Light Green
Shifnal Station Upgrade - Platform length, DDA, Parking	Yellow	Light Green	Light Green
Albert Edward Bridge & Ironbridge - Shifnal Track works	Yellow	Light Green	Light Green
Ironbridge Power Station to Shifnal Shuttle Service including turnaround	Light Green	Light Green	Dark Blue
Wolverhampton Station	Yellow	Light Green	Light Green
Mid Wales Lines Electrification	Light Green	Light Green	Dark Blue
Shrewsbury Station	Light Green	Green	Dark Blue
Wolverhampton - Shrewsbury - Crewe / Chester / Liverpool Rail link	Light Green	Light Green	Dark Blue
Convert 19 to rail service	Light Green	Light Green	Dark Blue
Passing loop installations	Light Green	Green	Green

As part of next steps there will need to follow some prioritisation of projects within each phase

Category	Scheme Benefits
Rail / Road	All
Public Realm	Existing / Ironbridge
Road	All
Road	Cosford / Clive Barracks (Tern Hill) / Bradford
Road	All
Road	All
Road	All
Road	All
Road / Sustainability	Existing
Sustainability	Ironbridge
Sustainability	All
Sustainability	All (Cosford & M54 J3 site)
Sustainability	All
Sustainability	Cosford
Local PT	Bradford / Cosford
Local PT	Clive Barracks (Tern Hill) / Cosford / Bradford
PT	All
Rail	All
Rail	Existing
Rail	Bradford / Cosford
Rail	Shifnal
Rail	Ironbridge
Rail	Ironbridge
Rail	All
Rail	All
Rail	All
Rail	All
Rail	Ironbridge / All
Rail	All

Summary

It can be seen from this document that the STWSDC is a key corridor on a local, regional and national level and a location that has the opportunity to significantly increase residential, and employment development in particular.

As discussed at the beginning of this document, the STWSDC is also a timely opportunity to tackle a number of issues that currently contribute to climate change. Shropshire Council's **Corporate Climate Change Strategy** aim is to 'help mitigate and adapt to climate change, and to ensure a sustainable future for the county' with three main strategic objectives:

- To mitigate the effects of climate change through carbon reduction of our services
- To adapt services and their delivery to respond to changes in the climate
- To promote sustainable practices via all services.

Future transport services and infrastructure design will have a significant influence on the potential to reduce carbon levels in particular and so the opportunity exists to respond to the climate change agenda and promote sustainable transport services and facilities with this collaborative approach.

WSP have worked closely with Shropshire Council and a number of other stakeholders, including Telford and Wrekin Council, Wolverhampton City Council and RAF Cosford representatives, to produce this sustainable strategy to emphasise the opportunity that existing to progress with a cumulative approach and support the four key sites identified for consideration, which are:

- Ironbridge Power Station (Harworth Estates)
- RAF Cosford and RAF Cosford Museum
- Clive Barracks, Tern Hill (MOD)
- Junction 3, M54 (Bradford Estate Land)

The set of transport proposals listed here can help to support these developments, provide better links along the route between Shropshire and the other local authorities, improve cross border connectivity to mid-Wales and create a nationally significant growth area for other parts of the country to connect to.

In particular, a significant opportunity exists to improve linkages between rail, cycling and walking facilities and promote the use of sustainable modes and support the aim to combat climate change.

In order to develop and support this potential it is vital that the transport infrastructure along the corridor is improved to alleviate existing capacity issues and unlock the STWSDC's potential.



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