

Shropshire Council

Green Belt Assessment

Patshull Road, Albrighton, Shropshire

Final report

Prepared by LUC

September 2025



Shropshire Council

Green Belt Assessment Patshull Road, Albrighton, Shropshire

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Chapter 1

Introduction

1.1 LUC was commissioned by Shropshire Council to undertake an assessment of the Green Belt at land associated with planning application 24/02108/OUT, which lies to the south/south-east of the settlement of Albrighton enclosed by Cross Road to the north-west, Holyhead Road to the south and New House Lane. The site is referred to as Patshull Road by Shropshire Council. This study is required to determine the contribution the site makes to Green Belt purposes.

1.2 Following the agreement of a method statement (Appendix 1), this report sets out the context and assessment for this area of Green Belt.

Study aims and scope

1.3 The overall purpose of the study was to provide an independent, robust and transparent assessment of the site's contribution to Green Belt purposes in line with relevant national, regional and local planning policy, guidance and case law.

1.4 In accordance with paragraph 155 National Planning Policy Framework (NPPF)¹ this assessment concludes on whether the site as a whole, or any part of it, can be defined as grey belt. Commentary is also provided on whether the development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

Report Structure

1.5 The remainder of the report is structured as follows:

1.6 Chapter 2 sets out the site assessment context, including a description of the Green Belt, the site and national and local Green Belt policy and guidance;

1.7 Chapter 3 sets out the assessment findings; and

1.8 Chapter 4 provides a summary of the assessment.

Report Authors

1.9 LUC is an award-winning environmental consultancy providing planning, impact assessment, landscape design,

¹ Ministry of Housing, Communities and Local Government published a revised version of the National Planning Policy Framework in December 2024 (with Minor Corrections undertaken in February

2025). Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

ecology and digital design services to the public and private sector clients.

1.10 LUC provides advice on Green Belt planning to local authorities, developers and communities, covering Green Belt performance and impact of release assessment as well as other topics. LUC has worked with roughly 60 local authorities over the past 10 years, assessing over a third of all Green Belt land in England.

Chapter 2

Context and Policy

The Site

- 2.1** Located to the south of Albrighton, the area of land subject to this assessment (the site) covers 47.29ha and features large tracts of agricultural land.
- 2.2** The site extends from the southern edge of Albrighton, at the junction of Cross Road and Patshull Road.
- 2.3** Development is present along Cross Road to the north-west of the site comprising ribbon development, which pre-dated the Green Belt.
- 2.4** A Business Park is present along Cross Road towards the south-west.
- 2.5** There is also some development along Patshull Road, the site's eastern boundary, and along Holyhead Road, close to the southern boundary of the site. However, the wider character of the land within and around the site is agricultural and open in nature.
- 2.6** The site lies entirely within the Green Belt. It includes areas at risk of 1 in 30-year surface water flood events. Designated Heritage Assets (Lea Hall and the Boningale Conservation Area) are to the south of the site.
- 2.7** **Figure 1.1** illustrates the site in its wider context, **Figure 1.2** illustrates designations whilst **Figure 1.3** shows the site in a closer context.

Shropshire Green Belt

- 2.8** The Shropshire Green Belt is part of the wider West Midlands Metropolitan Green Belt which surrounds the West Midlands conurbation and Coventry.
- 2.9** The Shropshire Green Belt comprises the western part of the West Midlands Metropolitan Green Belt and is limited to the eastern part of Shropshire's administrative area. This is referred to in the adopted Development Plan as the 'Eastern Spatial Zone' (Green Belt designation is not found within any other Spatial Zone).
- 2.10** Shropshire Council has not adopted a new Strategic Development Plan document since 2015 and as such there has been no release of Green Belt land since the 2018 Green Belt Review. The MHCLG Local Authority Green Belt Statistics

for England: 2023 to 2024² confirm that as of 31st March 2024 the Shropshire Green Belt encompasses 24,480ha of land.

2.11 The Green Belt in Shropshire wraps around the following inset settlements: Albrighton, Alveley, Beckbury, Claverley, Shifnal and Worfield, as well as Alveley and Stanmore Industrial Estates.

National Planning Policy and Guidance

2.12 Government Green Belt policy is set out in Chapter 13 of the NPPF 'Protecting Green Belt Land'.

2.13 Paragraph 142 of the NPPF states that 'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

2.14 This is elaborated in NPPF paragraph 143, which states that Green Belts serve five purposes:

- 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.

2.15 The NPPF emphasises in paragraphs 144 and 145 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. Paragraph 145 goes on to say that:

'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period'.

2.16 Paragraph 146 states that:

'where an authority cannot meet its identified need for homes, commercial or other development through other means...authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally

undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.'

2.17 Paragraph 147 states that authorities must examine fully all other reasonable options for meeting its identified need for development before exceptional circumstances can be demonstrated. Notable reasonable alternatives include:

- a. makes as much use as possible of suitable brownfield sites and underutilised land;
- b. optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c. has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

2.18 Paragraph 148 states where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

2.19 'Grey belt' is defined in Annex 2 of the NPPF as *'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'*

2.20 When defining Green Belt boundaries, NPPF paragraph 149 states local planning authorities should:

- a. ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;

² <https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2023-to-2024>

- b. not include land which it is unnecessary to keep permanently open;
- c. where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d. make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e. be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f. define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

2.21 Paragraph 156 sets out that, where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should apply:

- affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;
- necessary improvements to local or national infrastructure; and
- the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces

2.22 Paragraphs 153 and 154 states that 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

2.23 New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in two closed lists. The first is in paragraph 154 which sets out the following exception:

- a. *'buildings for agriculture and forestry;*

- b. *the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c. *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- d. *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e. *limited infilling in villages;*
- f. *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g. *limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- h. *Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
 - i. *mineral extraction;*
 - ii. *engineering operations;*
 - iii. *local transport infrastructure which can demonstrate requirement for a Green Belt location;*
 - iv. *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - v. *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
 - vi. *development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.'*

2.24 Paragraph 155 goes on to state that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location; and
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.

2.25 The 'Golden Rules' or contributions set out in paragraph 156 include:

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of the Framework; or (ii) until such policies are in place, the policy set out in paragraph 157;
- b. necessary improvements to local or national infrastructure; and
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

National Planning Practice Guidance

2.26 The NPPF's Green Belt policies are supplemented by Planning Practice Guidance (PPG) on the role of the Green Belt in the planning system.

2.27 The PPG sets out:

- the key steps in a Green Belt assessment, including:
 - defining the location and scale of the assessment area;
 - evaluating contribution to the Green Belt purposes;
 - considering areas and assets lists in NPPF footnote 7;
 - identifying grey belt land; and
 - determining if proposals would fundamentally undermine the five Green Belt purposes (taken together) of remaining Green Belt in the plan area.
- key considerations in assessing the contribution Green Belt land makes to Green Belt purposes A, B and D when identifying grey belt land;
- what release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;
- how to determine proposals on potential grey belt land;

- guidance on identifying sustainable locations in the Green Belt;
- golden rules for housing development including, how major housing development should contribute to accessible green space; and
- how to consider the potential impact of development on the openness of the Green Belt.

2.28 The PPG makes it clear that local planning authorities, or appropriate groups of local planning authorities should produce a Green Belt assessment during the preparation or updating of all Local Plans, and Spatial Development Strategies that set the strategic context for land release.

Assessing Green Belt land to identify Grey Belt land

2.29 Authorities must identify grey belt land as part of necessary review and alteration of Green Belt boundaries in order to:

- a. Sustainably prioritise it over other Green Belt locations through the plan-making process.
- b. Help determine planning applications on Green Belt land in line with paragraph 155.

2.30 The guidance is clear that 'where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the NPPF', including whether development is sustainably located, whether there is a demonstrable unmet need for it and, in the case of development in the grey belt, whether it would not be inappropriate.

The appropriate scale of Green Belt assessments

2.31 Authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances. Local circumstances may dictate, for example, the need for smaller assessment areas in areas where there is greater variation in contribution to the Green Belt purposes or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors.

2.32 Green Belt land not judged to strongly contribute to any one of Green Belt purposes A, B and D has the potential to be identified as grey belt land. The assessment of variations in contribution to Green Belt purposes A, B and D must follow the following criteria.

2.33 Villages should not be defined as large built-up areas, towns or historic towns. Where there are no historic towns in or adjacent to a plan area, it may not be necessary to provide detailed assessments against Purpose D.

Assessment criteria

2.34 The PPG sets out illustrative criteria that should be considered when assessing the contribution of land to Green Belt Purposes A, B and D. These are set out in the tables below.

Table 1.1 Purpose A – to check the unrestricted sprawl of large built-up areas

Contribution Rating	Illustrative Features
Strong	Likely to be: ■ adjacent or near to a large built-up area; ■ free of existing development; ■ lack physical features in reasonable proximity that could restrict and contain development; and, ■ would result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt).
Moderate	Likely to be: ■ adjacent or near to a large built-up area, ■ and include one or more features that weaken contribution, such as (but not limited to): ■ contain or be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development; ■ being subject to other urbanising influences; and/or, ■ having physical feature(s) in reasonable proximity that could restrict and contain development.
Weak / No	Likely to be: ■ not adjacent to or near to a large built up area; or, ■ adjacent to or near to a large built up area, but containing or being

Contribution Rating	Illustrative Features
	largely enclosed by significant existing development.

Table 1.2 Purpose B – to prevent neighbouring towns merging into one another

Contribution Rating	Illustrative Features
Strong	Likely to be: ■ a substantial part of a gap between towns; ■ free of existing development; and, ■ would result in the loss of visual separation of towns.
Moderate	Likely to be: ■ located in a gap between towns, ■ and include one or more features that weaken contribution, such as (but not limited to): ■ a small part of a gap between towns; or ■ would not result in the loss of visual separation between towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.
Weak / No	Likely to: ■ not form part of a gap between towns; or, ■ form only a very small part of a gap between towns, without making a contribution to visual separation.

Table 1.3 Purpose D – to preserve the setting and special character of historic towns

Contribution Rating	Illustrative Features
Strong	Likely to: ■ form part of the setting of a historic town; ■ make a considerable contribution to the special character of a historic

Contribution Rating	Illustrative Features
	town, for example, as a result of being within, adjacent to, or of significant visual importance to the historic aspects of a town; and, ■ be free of existing development.
Moderate	Likely to: ■ form part of the setting and/or contribute to the special character of a historic town, and include one or more features that weaken their contribution, such as (but not limited to): ■ containing existing development; ■ being separated to some extent from historic aspects of the town by existing development or topography; or ■ not having an important visual, physical, or experiential relationship to historic aspects of a town.
Weak / No	Likely to not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town.

Applying NPPF footnote 7 to the definition of Grey Belt land

2.35 Grey belt land cannot be defined on Green Belt land covered by or affecting other NPPF footnote designations that ‘*would provide a strong reason for refusing and restricting development*’. In such locations, it may be necessary to only ‘*provisionally identify such land as grey belt in advance of more detailed specific proposals*’.

2.36 Footnote 7 states ‘The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.’ Assessing the impact of Green Belt release or development on the remaining Green Belt in the Plan area

2.37 The PPG states that a Green Belt assessment should not be limited to the impact of release or development of grey

belt land but any Green Belt land, and requires consideration of fundamental impact to all five Green Belt purposes (taken together) to all remaining Green Belt across the plan area as a whole. Such Green Belt locations should only be discounted for release or development where they would ‘*affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.*’

Identifying sustainable locations in a Green Belt

2.38 Whether reviewing Green Belt boundaries or determining applications for development in the Green Belt, the need to promote sustainable patterns of development should determine whether a site’s location would be appropriate for the kind of development proposed. Consequently, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.

2.39 The sustainability of specific locations should be determined in light of local context and site or development-specific considerations; however, authorities should seek to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.

Golden Rules for Green Belt development

2.40 Green Belt developments must contribute to accessible green spaces. Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.

2.41 Contributions to accessible green space should consider delivering:

- Good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.
- Include safe active travel routes and infrastructure (such as footpaths and bridleways).
- Nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.
- Arrangements for the long-term maintenance of green spaces.

2.42 Further guidance on Golden Rules for Green Belt development is set out in viability guidance, which states site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing. The government intends to review this Viability Guidance and will be

considering whether there are circumstances in which site-specific viability assessment may be taken into account, for example, on large sites and Previously Developed Land (PDL).

2.43 Prior to development plan policies for affordable housing being updated in accordance with paragraph 67 in the National Planning Policy Framework, the amount of affordable housing contributions required are subject to an overall cap of 50% or more.

Impact of development on the openness of the Green Belt

2.44 Where necessary, assessments of the impact of proposals on the openness of the Green Belt must be tailored to the circumstances of the case and may include consideration of a proposals:

- spatial volume, i.e. impact on spatial openness;
- visual impact, i.e. impact on visual openness;
- the duration of development, and its remendability; and,
- the degree of activity, such as traffic generation.

Harm of not inappropriate development to the Green Belt and its openness

2.45 If development is considered to be not inappropriate development on previously developed land (PDL) or grey belt, substantial weight does not need to be given to any harm to the Green Belt, including to its openness. This is justified by the land's definition as PDL or grey belt having already considered its impacts to openness or to Green Belt purposes.

Local Planning Policy

Shropshire Core Strategy 2006 – 2026

2.46 Shropshire's Development Plan comprises two parts: Part 1 containing the strategic policies (Core Strategy)³ and Part 2 containing detailed policies (SAMDev Plan)⁴. The Core Strategy was adopted under form national policy (Planning Policy Statements) whilst the SAMDev Plan was adopted under the NPPF.

2.47 The Core Strategy identifies 'Spatial Zones' with the Eastern Spatial Zone containing the Council's Green Belt designation.

2.48 Policy CS5 of the Core Strategy seeks to strictly control new development in accordance with national planning policies protecting the countryside and Green Belt.

2.49 As well as the inset settlements, the plan had removed 'safeguarded land' at Albrighton and Shifnal (beyond built form).

SAMDev Plan

2.50 Policy MD6 of the SAMDev Plan further requires development to be in accordance with CS5 of the Core Strategy but also requires development to demonstrate it does not conflict with the purposes of the Green Belt.

Shropshire Green Belt Assessment

2.51 Shropshire Council submitted a Draft Local Plan (2016 - 2038) for examination to the Secretary of State on 3rd September 2021. Following soundness concerns raised by the Secretary of State in February 2025 the Council has voted to withdraw the Local Plan from examination.

2.52 Notwithstanding the above, the Draft Local Plan was underpinned by a Green Belt Assessment in 2017 and a Part 2 Review in 2018 and provide the most recent reviews of the Shropshire Green Belt.

2.53 The assessment defined assessment parcels using physical features that are readily recognisable and likely to be permanent, such as railway lines, roads, public rights of way, treelines and topographical ridgelines.

2.54 The proposed development land (application site) was assessed as part of Parcel P-36, which also encompassed land to the north-east immediately adjoining the settlement of Albrighton. This assessment is material to this exercise however, owing to the differences in the parcel it is not considered that 2018 assessment provides an exact and current analysis for the application site.

2.55 It should also be noted these assessments defined 'large built-up areas', 'towns' and 'historic towns' but was written prior to the release of the February 2025 PPG. As such, whilst these assessments are material they are not considered to be determinative in these matters (following the approach of recent appeal and Secretary of State decisions).

³ Shropshire Local Development Framework: Adopted Core Strategy (March 2011)

⁴ Shropshire Council Site Allocations and Management of Development (SAMDev) Plan (December 2015)

Chapter 3

Assessment Findings

3.1 This chapter sets out the contribution the site makes to each of the Green Belt purposes and, considering the contribution made to Purposes A, B and D (and any relevant footnote 7 designations), whether the site constitutes grey belt land.

Footnote 7 Designations

3.2 There are no footnote 7 designations within any of the development parcels except for areas at risk of surface water flooding. These are identified by EA flood maps (1 in 30, 1 in 100, 1 in 1000 likelihood).

3.3 It is noted that a Consultee comment from 23rd July 2024 had identified the need for a Sequential Test to address pluvial and groundwater sources of flooding. Additional information has been provided by the applicant since this initial comment; however, there is no additional consultee comment publicly available to confirm whether this information is now acceptable.

3.4 Shropshire Council will be required to have regard to Paragraphs 173 and 174 of the NPPF and relevant PPG. Particular regard will also be required to be given to Paragraph 175 of the NPPF to inform this assessment as well as any potential mitigation measures.

3.5 Sited on the junction of Patshull Road and Holyhead Road are two Grade II listed buildings, Lea Hall and a Barn within its curtilage. To the south of the site is the Boningale conservation area. The proposed development would be within the setting of these heritage assets and Shropshire Council will need to consider whether the development would be detrimental to their significance and if so whether the relevant tests of the NPPF are complied with.

3.6 Regardless of whether the parcels are assessed as making a strong contribution to Green Belt purposes, if the Council consider there is a 'strong' reason for refusal on flood risk or heritage grounds, the land could not be considered to be grey belt. Notwithstanding this, the following paragraphs consider whether the application site would be considered 'grey belt' owing to the land's contribution to Green Belt Purposes A, B and D..

Assessment of contribution to Green Belt Purposes

3.7 The methodology followed for assessing the contribution of the site to Green Belt purposes is set out in the Green Belt Assessment Method Statement (see Appendix A). This was agreed with Shropshire Council in July 2025.

Contribution to Purpose A

Proximity to large built-up area

3.8 The site lies immediately to the south of Albrighton, which is considered to be a town and a large built-up area (LBUA). The Green Belt Assessment Method Statement provides more information on the definition of Albrighton as a town and LBUA.

3.9 'Large built-up area' is a term solely used in reference to national Green Belt policy. In the context of the Shropshire Green Belt, Albrighton is one of the largest settlements inset from the Green Belt, with majority of settlements being villages or 'washed over' ribbon development. As such, Albrighton is not a village and the development site is in immediate proximity to a large built-up area.

3.10 Recent appeal decisions (including Secretary of State decisions) indicate that the definition of a town (and LBUA), in the context of Green Belt decision making, is a matter of planning judgment. In this case, we considered:

- the size and form of Albrighton;
- the services and facilities available in Albrighton;
- the relationship of Albrighton with other settlements in the Green Belt;
- the evidence base (adopted and unadopted)

3.11 The above considerations were informed by the updated PPG, which states that only villages should not be LBUA. The following appeal decisions were taken into account:

- APP/P1940/W/24/3346061 Land off Bedmond Road, Abbots Langley;
- APP/M1520/W/24/3351658 Land adjoining 451 – 460 Daws Heath Road, Hadleigh, Essex SS7 2UG;
- APP/M3645/W/24/3355743 Land West of Chapel Road, Smallfield, Surrey, RH6 9JH.

3.12 Since the publication of the Green Belt Assessment Method Statement the following additional appeals have been published which are considered to support the approach in the methodology:

- APP/T0355/W/24/3346409 Land to North and South of Gays Lane, Holyport;

- APP/P0240/W/24/3355615 Land adjacent to Lower Wood Farm, Sundon Road, Harlington LU5 6LN.

Extent of existing development

3.13 The site is undeveloped, comprising agricultural land. The proposed development would be bounded by Cross Road to the west and Newhouse Lane to east.

3.14 There are a number of detached dwellings along Cross Road, Patshull Road and Newhouse Lane, outside the site, and washed over by Green Belt.

3.15 Lea Farm Barns, located in the western part of the site (but excluded from the planning application area), off Holyhead Road, are former agricultural barns, converted to dwelling houses.

3.16 As such, the site is entirely open, undeveloped, greenfield land.

Extent of urbanising influences

3.17 Urban influences around the site are limited. As previously noted, there are several detached dwellings, loosely-knit along Cross Road, Patshull Road, Newhouse Road and Holyhead Road (A646). As previously stated, a number of these dwellings pre-date the Green Belt designation.

3.18 To the south-western end of Cross Road is a business park featuring warehousing buildings. This is separated from the ribbon of dwellings by a large undeveloped field. The warehouse buildings are visible when travelling along Cross Road, with screening from trees being intermittent and seasonal. The business park appears as an isolated, incongruous development in the countryside being surrounded by agricultural land.

3.19 The application identifies 'safeguarded land' and 'development land controlled by other developer' within the land use plan, but these are currently undeveloped plots of open fields with no adopted allocation or extant planning permission. They currently have no urbanising influence.

3.20 South of Holyhead Road there are low density dwellings accessed via the main road; however, this area largely comprises agricultural fields and, in the south-east, a large block of woodland.

3.21 When travelling along all of the roads to the south of Albrighton hedgerows, tree cover and agricultural fields are the overriding influence, with urbanising influences being localised and lacking scale and continuity.

Presence of physical features to restrict and contain development

3.22 There are no strong or consistent physical features to readily restrict and contain development within the application site.

3.23 The presence of dwellings along the site boundaries are not of a scale or form to contain development. With frontages being limited and within open plots.

3.24 As per the methodology, main roads with strong boundary vegetation are considered to be containing features. However, if they lack strong vegetation or emanate out of a LBUA are not considered to be containing.

3.25 Cross Road, Patshull Road and Newhouse Lane all emanate out of Albrighton.

3.26 Further, it is not considered Newhouse Lane is a main road, as it is largely single track.

3.27 Patshull Road intersects the middle of the site and whilst could be considered a main road has inconsistent vegetation allowing intervisibility of the main development parcels – through west to east.

3.28 Whilst Cross Road features some built form and hedgerows the views of wider agricultural fields when traversing it are still present, particularly during winter months and in areas where there is no vegetation containing the field. The built form and vegetation along the main road are not considered to be continuous enough to form any kind of significant containment of the western site parcels.

3.29 To the south of the development site is Holyhead Road (A464), which features hedgerows and trees. However, the height and extent of the separation via natural features is not consistent and its strength varies at the time of year. It is not considered there are strong landscape features which would contain the site so that it is associated with Albrighton to the north.

3.30 The A464 is a significant distance away from Albrighton and as such would not be considered to contain any development between it and the LBUA. As previously stated, the vegetation along the A464 is also inconsistent with intervisibility of agricultural fields (to the north and south) being apparent. As such, it is not considered to be restrictive or a physical feature that contains the site.

3.31 A portion of Holyhead Road features woodland on its southern side however, this is considered to be removed from Albrighton and is opposite proposed green space, it would not serve to contain any proposed built form.

3.32 The development would in effect weaken open land beyond the site in terms of its contribution to Green Belt purposes, owing to the lack of containment.

3.33 This is particularly so as all built form which would abut the development land, is not significant enough to contain it or is it considered to be in reasonable proximity to the settlement to associate development with it.

Impact of development on urban pattern

3.34 Development of the site would be a significant extension to Albrighton. It would be a large and incongruous extension of the town, which currently has a nucleated settlement form, into countryside which is currently subject to little urbanising influence. It would result in a significant protrusion to the south, appearing as protruding incongruous block. The residential blocks between Patshull Road and Newhouse Lane would be particularly incongruous owing to the undeveloped parcels to the north of it further separating the separate block of development along the road (still 'near' Albrighton).

Rating for contribution to Purpose A

3.35 As a result, the application site lacks urbanising influence, is not restricted and contained by physical features and would result in an incongruous development if development. The land therefore makes a **strong** contribution to Purpose A.

Contribution to Purpose B

Location in relation to towns

3.36 As previously stated, Albrighton is considered to be a town owing to its size, services and facilities and Development Plan context confirming it has historically been referred to and used as a Market Town.

3.37 The application site extends to the south of Albrighton and as such the development would not erode the gap to the North, East and West of Albrighton.

3.38 The closest town to the south of Albrighton is Kidderminster, (with only villages being present in between). The development would not create a contiguous form of development with any nearby villages and would not serve to erode any gap (whether substantially or minor)

Rating for contribution to Purpose B

3.39 As such the land makes **no contribution** to purpose B.

Contribution to Purpose C

Relationship with countryside

3.40 The site lies partly adjacent to the settlement boundary of Albrighton, which is defined by roads. As has been previously stated the small 'ribbon' development has a close relationship with the built form of Albrighton however, it is still separate from the town. This ribbon abuts the application site.

3.41 However, the site has no relation with the settlement being set outside of it and is not enclosed by any significant development. It comprises agricultural land and features no development within it. It maintains a strong sense of openness and would most accurately be described as being within the countryside and being characteristic of the countryside further south.

Extent of urbanising influence

3.42 The lack of development within the site, in conjunction with the 'other urbanising influences' identified in paragraphs 3.18 – 3.21 result in urbanising influence being localised and having little effect on the development land.

3.43 The agricultural use and size of the site gives it a countryside character which is further enhanced by the presence of the trees across the land and scattered tree lines.

3.44 It is acknowledged that the site was assessed as part of the Shropshire Green Belt Review: Stage 2 as part of Parcel P-36 and this considered the wider parcel to have a moderate strength in relation to Purpose C however, this was due to the urbanising influence of the settlement edge of Albrighton. Parcel P-36 included land to the north of the eastern most parcel immediately south of the High Street within Albrighton – the urbanising influence of the settlement was significant.

3.45 The current application site differs significantly from this parcel as it does not include this north-eastern area and the urbanising influence of the main settlement does not apply. As such, the urbanising influence noted in the assessment of P-36 would not be the same for the site.

3.46 In the absence of strong boundary features within and around the parcel, the integrity of adjacent Green Belt land would be weakened.

Rating for contribution to Purpose C

3.47 As such the land is part of the countryside and if developed would result in a significant urbanising influence on the land and wider countryside. The land therefore makes a **strong** contribution to purpose C.

Contribution to Purpose D

Relationship with historic towns

3.48 A review of relevant historic designations within and near to the site was undertaken. Albrighton is a historic Market Town within the Green Belt, with the High Street being its historic core, defined as the Albrighton conservation area.

3.49 The junction where Cross Road intersects the High Street is a significant distance away from the historic core and the historic core is defined in the Albrighton Conservation Area.

3.50 In the 2018 assessment P-36 was considered to make a strong contribution to Purpose D as it included the area of Green Belt to the south of High Street which lies within the conservation area. In contrast, the application site is further to the west, and there is no intervisibility with the conservation area. As such, the application site makes a weak contribution to Purpose D.

3.51 The Boningale conservation area lies to the south of the site. However, this does not relate to a historic town and is therefore not relevant for this consideration (whether the development would comprise a footnote 7 objection would be a separate consideration).

Rating for contribution to Purpose D

3.52 As such, the land makes a **weak** to Purpose D.

Contribution to Purpose E

3.53 All Green Belt land is considered to make an equal contribution to this purpose, and as per the method statement it is considered the land would make a **moderate** contribution to this purpose.

Chapter 4

Summary and conclusion

Contribution to Green belt purposes

4.1 The application site comprises land that is considered to be make a strong contribution to two of the five Green Belt purposes, as follows:

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

4.2 As the application site makes a strong contribution to purpose A, the land would not be considered to fall within the definition of grey belt.

Would development fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan?

4.3 Notwithstanding that the proposed development land would not comprise grey belt, we considered whether development would meet the test of the second part of paragraph 155.a of the NPPF is provided. In this regard, Paragraph: 008 Reference ID: 64-008-20250225 of the PPG states that when considering the impact on the remaining Green Belt in the plan area:

“A Green Belt assessment should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way”.

4.4 The 2018 assessment of Parcel P-36 (covering the site) concluded that it had a strong association with the wider countryside and its release would lead to a significant level of encroachment on the countryside and weakening of the neighbouring areas of Green Belt land.

4.5 In finding that the site makes a strong contribution to purpose C and comprising a significant tract of land, its development would create a significant encroachment into the countryside. The lack of containing features along site boundaries would affect the ability of immediately neighbouring parcels to safeguard the encroachment of further development into the countryside owing to the scale of development (and scale of undeveloped land).

4.6 However, in the context of the Green Belt across the plan area, its development would not fundamentally undermine the effectiveness of the Shropshire Green Belt, as it features large tracts of undeveloped countryside to the south beyond the A464, which would be able to maintain their contribution to Purpose C.

4.7 The site comprises only a small fraction of the wider Green Belt and its release or development would not affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.

Conclusion

4.8 The proposed development land (application site of 24/02108/OUT) would not be considered to be grey belt owing to its **strong** contribution to Purpose A. However, the proposed development would not fundamentally undermine the purposes of the Green Belt as a whole.

Appendix A

Green Belt Assessment Method Statement

Green Belt Assessment Method Statement

Residential Development, Patshull Road,
Albrighton, Shropshire

Shropshire Council

Final Report

Prepared by LUC

June 2025

Version	Status	Prepared	Checked	Approved	Date
1	Draft	W Hossack	P Smith	P Smith	8/7/2025
2					
3					



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Chapter 1

Introduction

1.1 This method statement is the first output of work instructed by Shropshire Council pertaining to the assessment of relevant Green Belt land associated with pending planning application 24/02108/OUT ('the site'). It is the first of three agreed outputs (Task 1), confirming the methodology to be undertaken for the subsequent Green Belt assessment (Task 2).

1.2 The statement also provides more in-depth discussion around the terms 'Large built-up area' and 'Town' in relation to Albrighton, drawing on relevant appeal decisions and judgements. Discussion and agreement of these points will help to frame the Green Belt assessment (Task 2), as well as a reflection on the previous assessments carried out by LUC.

1.3 The statement is structured as follows:

- **Chapter 2** – sets out the proposed methodology for the site-specific Green Belt Assessment, this includes references to the Green Belt PPG and particular definitions.
- **Chapter 3** – provides a summary of relevant appeals and judgements in relation to definitions of a 'large built-up area' and a 'town' (this will provide the basis for Task 2 outputs on these matters).
- **Chapter 4** – draws conclusions on whether Albrighton should be considered as a town and/or a large built-up area in the context of a Green Belt assessment.

1.4 We ask that Shropshire CC provides confirmation or queries prior to commencement of the Task 2 assessment.

Chapter 2

Proposed Methodology for Site-specific Green Belt Assessment

2.1 This chapter outlines the proposed methodology to be used to undertake the Green Belt and grey belt assessment of the site, with reference to relevant planning policy, practice guidance and case law. The Planning Practice Guidance (PPG) published in February 2025 is particularly relevant to the methodology outlined in this chapter.

2.2 As per LUC's proposal to Shropshire Council (24th April 2025) the report will firstly focus on a general assessment of the site and its contribution to the five Green Belt purposes. Following the findings of the assessment, the report will then provide two subsequent conclusions as to whether:

- i. The site could be regarded as 'grey belt'; and if so,
- ii. whether the proposed development will fundamentally undermine the Green Belt purposes taken as a whole.

2.3 This chapter describes the methodology for assessing the contribution of the site to Green Belt purposes; points i. and ii. Above will be decided following the assessment.

Assessment of Green Belt Contribution

2.4 The following sections set out the approach to be taken, identify the factors relevant to each of the Green Belt purposes and describe the assessment outputs specific to each purpose. This has been partly informed by the PPG update in February 2025.

Purpose A – to check the unrestricted sprawl of large built-up areas

2.5 The following features in combination are identified as being illustrative of a 'strong' contribution:

- Proximity to a large built-up area;
- Absence of existing development;
- Lack physical features in reasonable proximity that could restrict and contain development;
- A location which, if developed, would form an incongruous pattern in relation to the large built-up area.

2.6 The presence of one or more of the following features, in addition to being near to a large built-up area, is identified as being illustrative of a 'moderate' contribution to Purpose A:

- Presence of, or containment by, development such that any new development would not result in an incongruous pattern of development.
- Being subject to other urbanising influences.
- Having physical feature(s) in reasonable proximity that could restrict and contain development.

2.7 Either lack of proximity to a large built-up area or the presence of, or containment by, significant existing development, is identified as being illustrative of a 'weak' contribution to Purpose A.

Purpose A definitions

2.8 The PPG uses several terms which require further definition to be applied as part of the assessment process namely:

- Large built-up area;
- Near to
- Free of existing development
- Physical features in reasonable proximity...that could restrict and contain development
- Enclosed by existing development (partially or largely)
- Other urbanising influences
- An incongruous pattern of development

‘Large Built-up area’

2.9 The 2025 update to the PPG states that ‘villages should not be considered ‘large built-up areas’. The implication of this is that towns or cities are large built-up areas.

2.10 Chapter 3 provides a full review of recent decisions and case law that further discuss this definition in relation to Albrighton.

‘Near to’

2.11 Purpose A is relevant to land which is “adjacent or near to” a large built-up area. The extent to which land in the vicinity of a large built-up area relates to it is a question of judgement based on a range of factors including:

- Distance proportional to the size and proximity of large built-up areas.
- Features that create a sense of physical and/or visual separation.
- Features that weaken the sense of separation through physical and/or visual connection.
- Urbanising development and activity within the Green Belt.

2.12 Although villages are not large built-up areas, a village that lacks significant separation from and/or is relatively close to a large built-up area as a result of one or more of the factors outlined above is considered to be near to a large built-up area.

2.13 The point beyond which Green Belt land is not considered to be near to a large built-up area is where development, whether it be the expansion of existing satellite settlements or the creation of new settlements, would be sufficiently distinct from the existing large built-up area as to not be perceived as sprawl.

‘Free of existing development’

2.14 ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law generally considers does not affect the openness of the Green Belt.

2.15 ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

‘Physical features in reasonable proximity...that could restrict and contain development’

2.16 Many features could be considered to define the edge of a developed area, including features created in association with new development, but the concept of ‘restricting’ and ‘containing’ development is considered to relate to the extent to which new development would be prevented from having an urbanising influence on land immediately beyond by intervening physical features. Urbanising influence is one of the factors identified in the PPG as being indicative of a ‘moderate’ contribution to Purpose A. If land which currently makes a ‘strong’ contribution to Purpose A would, as a result of

increased urbanising influence, make a weaker contribution, such that it became grey belt, then development would not be deemed to ‘restrict and contain’ development.

2.17 Where full development proposals are not known, this judgement can be based on existing physical features in reasonable proximity of the site, without consideration of potential strengthening of boundaries that could be associated with particular development proposals. Physical features that restrict and contain development would typically be:

- Strong natural landscape elements such as woodlands or changes in topography, which limit views or create a stronger sense of separation between urban and open land; or
- Natural or manmade features that present a physical barrier to movement, and which have some visual screening role, such as tree-lined rivers or canals, motorways and railway lines with embankments, or main roads with strong boundary vegetation.

2.18 Such features are not considered to restrict and contain development if they emanate out from a large built-up area.

‘Enclosed by existing development’ (‘partially’ or ‘largely’)

2.19 The extent to which land can be considered to be enclosed by development is a judgement which depends on the strength of the existing development’s urbanising influence on neighbouring Green Belt land and the strength of the neighbouring Green Belt land’s physical and/or visual relationship with the wider countryside. The greater the proportion of a defined Green Belt area’s boundary which adjoins urban development (whether that is inset from the Green Belt or washed-over by it), the greater its enclosure. Strong urban edge boundary features which limit urbanising influence can limit a sense of enclosure or containment by adjoining existing development, as long as there is some sense of connectivity with the wider countryside. Conversely, a lack of physical and visual connectivity with the wider countryside can increase

the sense of enclosure, even if urban development around a Green Belt area is not strongly visible.

‘Other urbanising influences’

2.20 Separate to the consideration of existing development within the Green Belt, ‘other urbanising influences’ could be land use or activity in a site which is generally associated with urban areas, or it could be an urbanising influence from adjacent inset / non-Green Belt development.

2.21 The PPG refers to activity in the Green Belt, such as traffic, having an impact on openness. In some cases, there may be land uses which, although appropriate and not therefore affecting openness, still have an association with the urban area that constitutes a degree of urbanising influence. Notable examples could include sport and recreational playing fields or ‘large areas of fixed surface infrastructure such as large areas of hardstanding [that have not blended into the landscape]’, the latter of which is defined in the NPPF as PDL.

2.22 The strength of urbanising influence associated with such areas will depend on a number of factors, including the presence or lack of intervening physical boundary features, the scale/visibility of development in the associated urban area, such as schools, landform change, distance from the existing urban edge and strength of relationship with the wider countryside.

‘An incongruous pattern of development’

2.23 The PPG cites an extended “finger” of development into the Green Belt as an example of an incongruous pattern of development. This scenario can also relate to where there are smaller ‘satellite’ settlements around large built-up areas which lie close enough to them to be at risk of merging were development to reduce separation between them. Significant loss of separation in such a gap, could in effect lead to the satellite settlement becoming an extended finger of the large built-up area.

2.24 Any breaching of a significant existing physical feature, or a significant combination of adjacent physical features, that currently serve to restrict and contain the existing large built-up area, would also form an incongruous pattern of development. Examples of this sort of step-change in settlement form would be development crossing a major retaining and containing road, railway or river, or extending out from a valley onto a hilltop into open Green Belt land that does not relate well to existing development.

Purpose B – to prevent neighbouring towns merging into one another

2.25 The following features in combination are identified as being illustrative of a ‘strong’ contribution:

- Land forming a substantial part of a gap between towns;
- Free of existing development;
- Development would result in the loss of visual separation of towns.

2.26 The presence of one or more of the following features in a gap between towns is identified as being illustrative of a ‘moderate’ contribution to Purpose B:

- Land forming a small part of a gap between towns;
- Development would not result in the loss of visual separation of towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.

2.27 Green Belt land that does not have a relationship with a gap between towns or forms only a very small part of a gap between towns, such that it makes no contribution to visual separation, is identified as being illustrative of a ‘weak’ contribution to Purpose B.

Purpose B definitions

2.28 For Purpose B the PPG uses the following terms which require definitions to be applied as part of the assessment process these are:

- Town
- A substantial part of a gap
- A small or a very small part of a gap
- Loss of visual separation
- Free of existing development

‘Town’

2.29 The PPG states that ‘this purpose relates to the merging of towns, not villages’.

2.30 Chapter 3 provides a full review of local/regional policy in, recent decisions and case law that further discuss this definition in relation to Albrighton.

‘A substantial part of a gap’

2.31 Whether part of a gap can be described as substantial is a function not just of its relative size to a gap as a whole but also the physical features in it. Some ‘separating’ features, such as woodlands, landform features, major roads, railways and rivers strengthen perceived separation, particularly where they contribute to visual separation. Roads and railways can also be ‘connecting’ features that strengthen the link between towns, reducing the time taken to pass through a gap and weakening the role of visual separators.

2.32 Smaller urban areas – villages and hamlets, industrial, educational and retail estates – between towns can be physically and visually connecting

features. Towns may be some distance apart but, due to the presence of such smaller urban areas between them, intervening open Green Belt land may be judged more important to maintaining visual separation than distance alone might suggest.

2.33 A site will contribute more to the ‘substance’ of a gap between towns if it contains key separating features, and the more fragile a gap, either as a result of its size and/or the presence/absence of connecting/separating features, the smaller a part of a gap might be to be considered substantial. Gap fragility is a key consideration in establishing what is and is not substantial within or adjacent to a gap between neighbouring towns.

2.34 Gap fragility is judged based on a combination of factors including the relative size of the gap and/or the presence/absence of connecting and separating features:

- A robust gap will typically be relatively wide and contain significant physical features that maintain visual separation.
- A moderate gap may be relatively wide but lack significant physical features that maintain visual separation or be relatively narrow but contain physical features that maintain visual separation.
- A fragile gap will typically be relatively narrow and lack physical features that maintain visual separation.

2.35 Green Belt land can play a peripheral role and therefore make a more limited contribution to a gap between towns where it does not lie directly in a gap, but its development would weaken Green Belt land in a gap. Green Belt land on the periphery of fragile gaps may still be judged to be a substantial part of it but otherwise will generally not. Green Belt land within a gap may also to an extent be considered peripheral if the neighbouring towns in question are already to a significant extent connected by development.

2.36 Development expanding a town out into the core of a gap, removing a relatively large part of it, would clearly represent a substantial impact, but such scenarios would generally be captured as making a ‘strong’ contribution to

Purpose A (and therefore not be eligible for definition as grey belt) as a consequence of a likely resulting incongruous pattern of development.

2.37 Relatively wide gaps between towns generally have scope for some new development within them without significant loss of visual separation between neighbouring towns. Consequently, sites within or on the periphery of relatively wide gaps that only represent ‘a substantial part of a gap’ between towns by virtue of their size are generally rated as making a ‘moderate’ contribution to Purpose B, in acknowledgement of their potential to accommodate development in smaller parts of them without loss of visual separation of towns. In this way the assessment findings help point to areas of search where there could be potential (in Green Belt terms) for development, including new settlements, in gaps between neighbouring towns.

‘A ‘small’ or ‘very small’ part of a gap’

2.38 ‘A small part of a gap’ is judged to be an ‘insubstantial’ part of it – that is, land in a gap that does not meet the ‘substantial’ definition above – but one which still provides a degree of visual separation.

2.39 A ‘very small’ part of a gap is an area which does not contribute to visual separation, generally as a result of their exiting development and/or containment and significant urbanisation. Such areas would generally correspond to areas judged to make a weak contribution to Purpose A defined above.

‘Loss of visual separation’

2.40 ‘Loss’ is interpreted as a ‘significant reduction’ in visual separation, rather than its complete removal. Typically, the development of a substantial part of a gap has the potential to equate to a significant loss of visual separation. Negligible reductions in visual separation are likely to be limited to areas

already containing existing development and/or are contained and significantly urbanised by urban areas.

‘Free of existing development’

2.41 ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law generally considers does not affect the openness of the Green Belt.

2.42 ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

Purpose C – to prevent encroachment into the countryside

2.43 Purpose C is not referenced in the PPG as it is not relevant in the first instance to the identification of grey belt however, it is still one of the five purposes of the Green Belt set out in the NPPF. The rating of the contribution of Purpose C could still help inform any judgements grey belt sites that are more suitable for release than others.

2.44 The contribution of a site to Purpose C is determined in terms of whether land makes a strong, moderate or weak contribution to this purpose (like other purposes in the methodology). A detailed explanation of the rating is as follows.

2.45 The following features in combination are identified as being illustrative of a ‘strong’ contribution:

- Land is part of the countryside;

- Land is subject to negligible or no urbanising influence, and has a strong sense of separation from urban areas;
- There are a lack of features to restrict and contain development, such that were development to take place within the parcel there would be an urbanising impact on adjacent Green Belt land.

2.46 The following features in combination are identified as being illustrative of a 'moderate' contribution:

- Land is part of the countryside;
- Some urbanising influence;
- The presence of features to restrict and contain development, such that were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

2.47 The following features in combination are identified as being illustrative of a 'weak' contribution:

- Land is wholly or largely contained from the wider countryside by development, or openness is significantly limited by existing development.
- Significant urbanising influence.
- Adjacent open land would not be subject to stronger urbanising influence than is currently the case, were development to take place.

Purpose C definitions

2.48 For Purpose c the following terms which require definitions to be applied as part of the assessment process are:

- Part of the Countryside;
- Urbanising influence

‘Part of the Countryside’

2.49 Green Belt land is part of the countryside where it is open and has a clear connection with the wider open countryside. Physical isolation from the wider countryside, uses which create a strong association with an urban area, or the presence of existing urban development can affect what is judged to be countryside in Green Belt terms. This is not a judgement which considers the scenic beauty or condition of land.

‘Urbanising influence’

2.50 This is defined as a combination of both the influences of ‘existing development’ and ‘other urbanising influences’ (both defined under Purpose A above). This includes urbanising development washed over by, inset within or directly adjacent to the outer edges of Green Belts, such as villages and hamlets, industrial, educational and/or retail estates.

2.51 Relevant factor influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform change, distance from the urban areas, and the strength of relationship with the wider countryside.

Purpose D – to preserve the setting and special character of historic towns

2.52 For Purpose D, the following features in combination are identified as being illustrative of a ‘strong’ contribution to Purpose D:

- Form part of the setting of a historic town;
- Absence of existing development;

- Make a considerable contribution to a historic town's special character – being within, adjacent or of significant visual importance to historic aspects.

2.53 The presence of one or more of the following features, in addition to being part of the setting and/or contributing to the special character of a historic town, is identified as being illustrative of a 'moderate' contribution to Purpose D:

- Containing existing development;
- Separated from historic aspects of the town by existing development or topography;
- No important visual, physical, or experiential relationship to historic aspects of a town.

2.54 Land that does not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town is illustrative of a 'weak/no' contribution to Purpose D.

Purpose D definitions

2.55 For Purpose D the PPG uses the following terms which require definitions to be applied as part of the assessment process these are:

- Historic Town
- Setting and Special Character
- Historic aspects
- Free of existing development

'Historic Town'

2.56 The PPG is clear that this purpose relates to historic towns, not villages. An extract from Hansard in 1988 clarified which historic settlements in England

were certainly considered ‘historic towns’ in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge. Durham has since been added to this list.

2.57 It has been LUC’s experience through consultation with Historic England on several Green Belt study method statements, that Historic England do not consider the list on towns quoted in Parliament to necessarily be exclusive. Therefore, the settlements referenced under the definitions of ‘large built-up area’ (see section titled Purpose A definitions) and ‘town’ (see section titled Purpose B definitions) above all have the potential to be defined as ‘historic towns’ relevant to the assessment of Purpose D, subject to the definition of their historic settings or special character.

‘Setting and Special Character’

2.58 The extent to which the Green Belt contributes to the setting and special character of a historic town is related to the visual, physical or experiential relationship between Green Belt land and historic aspects of a town.

2.59 What forms part of a historic towns setting and/or contributes to the special character of a historic town cannot be generally defined. It is unique to each historic town’s character, townscape and connections to the wider landscape.

2.60 The connection between a historic town’s historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement.

‘Historic aspects’

2.61 In order to establish the relevance of Green Belt land to history aspects of a historic town it is necessary to review and research each historic town’s historic aspects in turn.

2.62 Reference to the open countryside or key physical features and/or landmarks in the Green Belt can then be used to judge and justify the appropriate level contribution of relevant Green Belt land to a historic town’s setting and special character.

2.63 Many historic towns have historic aspects that have little to no relationship with their setting and special character, and many historic towns contain historic areas focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than part of the historic town’s setting and special character. Where this is the case, contribution to Purpose D can often be ruled out.

‘Free of existing development’

2.64 ‘Free of existing development’ is defined under Purpose A and B above. The same definition applies to Purpose D.

Purpose E – to assist in urban regeneration by encouraging the recycling of derelict and other urban land

2.65 Purpose E is not referenced in the PPG as it is not relevant in the first instance to the identification of grey belt however, it is still one of the five purposes of the Green Belt set out in the NPPF. The rating of the contribution of

Purpose E could still help inform any judgements grey belt sites that are more suitable for release than others.

2.66 Most Green Belt studies do not assess individual Green Belt sites against Purpose E, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that the release of one parcel of Green Belt land has a greater impact on encouraging re-use of urban land than another.

2.67 The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) notes that with regards to Purpose E "this purpose applies to most land" but that "it does not form a particularly useful means of evaluating sites".

2.68 More generally regarding plan-making, paragraph 147 of the NPPF states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development [including] a) makes as much use as possible of suitable brownfield sites and underutilised land and b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport'. In other words, Purpose E must have already been exhausted before options in the Green Belt are considered further.

2.69 In the absence of any clear guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or more limited, role in encouraging urban regeneration, a uniform level of 'moderate' contribution to Purpose E is generally applied.

Chapter 3

Review of Definitions

3.1 This chapter summarises recent judgements and guidance in relation to the definition of ‘town’ and ‘large built-up area’. Chapter 4 then considers whether Albrighton should be considered to fall within either or both of these definitions.

National guidance and previous assessments

3.2 The updated NPPF and PPG do not offer an exacting definition as to how settlements should be considered to meet these definitions. The only guidance at the national level is that a ‘village’ should not be considered to be a large built-up area.

3.3 This infers that towns can be large built-up areas (otherwise they too would be excluded).

3.4 The 2018 Green Belt assessment that LUC undertook for Shropshire Council assumed that Shropshire itself did not include a large built-up area. It was agreed that Telford and the West Midlands conurbation were to be considered ‘large built-up areas’. Paragraph 3.28 explicitly stated that:

“As Shropshire does not have a large built-up area, it was agreed with Shropshire Council that Telford and the West Midlands conurbation should be considered to be the ‘large built-up areas’ surrounding the Green Belt. Of these, only Telford is adjacent to the Green Belt in Shropshire. Therefore, only those areas within the Shropshire Green Belt that lie adjacent to the ‘large built-up area’ of Telford have been considered under Purpose 1 for this study. The Green Belt lying adjacent to other towns within the Shropshire Green Belt, such

as Shifnal, Bridgnorth and Albrighton, have not been assessed under Purpose 1 as they do not form part of a 'large built-up area'.

3.5 Albrighton was considered a town for the purposes of the previous Green Belt assessments that (see paragraphs 3.37 – 3.42 of the Green Belt Assessment: Part 2).

3.6 The methodology for identifying the large built-up area assumed that towns could not also be described as large built-up areas, for the purposes of the study. However, following the new Green Belt guidance, planning appeal cases suggest that towns can also be considered as large built-up areas.

Secretary of State Appeal Decision

APP/P1940/W/24/3346061 Land off Bedmond Road, Abbots Langley

3.7 This recovered appeal pertained to a large 84,000m² data centre. The appeal was recovered on 8th July 2024 (prior to the PPG); however, the Inspector's recommendation was made on 11th February 2025 (after December 2024 NPPF) and the SoS Decision was issued on May 2025 (after publication on Green Belt PPG). The decision acknowledges that the Secretary of State (SoS) allowed the main parties to the opportunity to comment regarding the PPG; – as such, this recovered appeal serves as a SoS endorsed position on grey belt.

3.8 The issue at hand pertained to the Paragraph 155 ('grey belt exception test') in the NPPF and the interpretation of a large built-up area and towns. Abbots Langley is historically identified as a village. The Inspector's initial report identified Abbots Langley as a village. However, the Secretary of State decision explicitly stated in relation to Purpose A:

*“The Secretary of State has considered whether Parcel 1 contributes strongly to purpose a), to check the unrestricted sprawl of large built-up areas. **She notes that the Green Belt studies for Three Rivers District and Watford Borough (CD.E3 and CD.E4, dated 2017 and 2019 respectively) do not include Abbots Langley on the list of large built-up areas.** She has also given regard to the Inspector’s assessment at IR176...Overall, **and having given regard to the PPG on purpose a) of the Green Belt, the Secretary of State agrees with the Inspector and the Council that Parcel 1 does not contribute ‘strongly’ to checking the unrestricted sprawl of large built-up areas (IR176)**”.*

3.9 As an assessment of Purpose A is engaged (and the SoS had regard to the containment of the parcel) then Abbots Langley was considered to be a large built-up area by the SoS. Following PPG guidance this means that Abbots Langley was considered by the SoS to be a large built-up area and not a village.

3.10 It is less clear if Abbots Langley was considered to be a town however, as if it is not a village this would be the next logical definition. It should be noted that evidence for the appeal from local councillors, residents and the Council pertained to historical records referring to Abbots Langley being considered to be a village. The LPA had also initially withdrawn its contention that Abbots Langley was a town during the appeal, conceding it was a village.

3.11 The decision does imply that Abbots Langley is a Town, as when considering Purpose B it was highlighted that the appeal site is not within a gap between existing towns that are at risk of coalescence, as the settlement of Bedmond is a village (if Abbots Langley were a village the identification of Bedmond as a village would be unnecessary).

3.12 As such, a key conclusion of this appeal is the SoS approach that the omission of Abbots Langley as a ‘large built-up area’ from previous assessments was not relevant at the point of determination (as it was considered to be one in the assessment).

APP/M1520/W/24/3351658 Land adjoining 451 – 469 Daws Heath Road, Hadleigh, Essex, SSS7 2UG

3.13 This allowed appeal pertained to the construction of 173 of new dwellings in Daws Heath. Whilst the appeal was allowed the Inspector's reasoning is useful for considering whether Daws Heath was in fact a large built-up area or a town.

3.14 Firstly, the Inspector noted that the evidence base referred to Daws Heath as a village (other settlements identified as towns). This was the Regulation 18 consultation and also identified towns (excluding Daws Heath considering it to be a 'semi-rural village').

3.15 However, the Green Belt review stated that Daws Heath represented a large built-up area within the context of the Borough, and within its local context Daws Heath is considered to be a neighbouring town. The appeal cited conflicting appeal decisions on the matter whether Daws Heath engaged certain Green Belt purposes.

3.16 The emerging Local Plan was withdrawn; however, the Inspector placed weight on the fact the examining Inspector took no issue with the approach of the Green Belt Review including its approach to large built-up areas and towns.

3.17 There was significant contradictory evidence therefore the Inspector stated in Paragraph 20 of the decision:

"What is clear, is that there is not a universal accord within the supporting evidence with regard to the matter of whether Daws Heath should be considered a Town or Village".

3.18 As such, the Inspector then made their own assessment on this matter stating in Paragraph 21 of the decision:

*“Daws Heath incorporates in the main residential property from varying periods. **Services and facilities are limited which is indicative of a village and I consider that to be classed as a Town, Daws Heath would amongst other things have to have more services and facilities and be larger.** Whilst acknowledging the evidence, my overall conclusion on this important matter is that Daws Heath is a village”.*

3.19 In finding Daws Heath is a village, the appeal offers no further commentary on the assessment of what constitutes a large built-up area (in accordance with PPG).

3.20 Similar to the SoS approach in the Abbots Langley case study, whilst regard may be given to Green Belt Reviews that define settlement types and hierarchies, this in itself is not considered determinative for the definitions of Green Belt purposes.

3.21 The key factors the Inspector considered in concluding that Daws Heath is a village were:

- In finding that the development plan and evidence base had conflicting references the Inspector had to make their own judgement;
- The Inspector found that limited services and facilities are indicative of a village; to be a town there had to be more;
- The Inspector found that, not only were more services and facilities required to be considered a Town, but also the settlement had to “*be larger*”.

APP/M3645/W/24/3355743 Land West of Chapel Road, Smallfield, Surrey RH6 9JH

3.22 This appeal pertained to the construction of 270 dwellings adjacent to 'Smallfield' an inset settlement.

3.23 The decision does not provide any commentary on whether Smallfield is a town as it was common ground the parcel did not contribute to Purpose B. As such, the Inspector's consideration pertained to whether Smallfield was a large built-up area or a village (no consideration of a town).

3.24 The Inspector confirmed that the question of whether Smallfield was a village or not is a matter of planning judgement.

3.25 Of note, the Inspector found it relevant to have regard to the development plan in the first instance, specifically the Settlement Hierarchy.

3.26 The Development Plan policies made multiple references to Smallfield being a village and a "Larger Rural Settlement" and stated in paragraph 22:

*"In my view the development plan as a whole provides a clear indication that Smallfield is a village. **However, it is not determinative because it predates the provisions of the Framework and Guidance that are pertinent here. Other factors need to be taken into account.** The Council drew attention to a Green Belt Assessment (2015). This formed part of the evidence base for a local plan that ultimately was not taken forward. Nevertheless, it is a material consideration..."*

3.27 A separate implication to note is the Inspector's deliberation of the Settlement Hierarchy prior to determining Smallfield is a village. Namely, paragraph 27 states:

*“Table 4 of the TDSH sets out approximate populations by settlements. **The individual figures may have changed over time, but there is no evidence that the overall pattern of population distribution has altered significantly.** It can be seen from the Current Settlement Categories Map **that some of the settlements listed individually in Table 4 are contiguous with other settlements, thereby forming Main Urban Areas such as Limpsfield/Oxted/Hurst Green and Warlingham/Whyteleafe.** When the population of Smallfield, which is given in Table 4 as 3,800, is compared with those of the Main Urban Area, it can be seen that it is indeed notably lower”.*

3.28 The key factors the Inspector considered in concluding Smallfield as a village were:

- being referred to as a ‘built-up area’ in the Green Belt assessment, inferring the authors believes it was, when carrying out an assessment against Purpose A.
- The scale of the settlement and range of services and facilities it offered are relevant factors (reflecting the approach of the Daws Heath appeal).
- The Settlement Hierarchy placed Smallfield in the second tier of settlements (below urban settlements) and is explicitly characterised as a ‘semi-rural service centre’. The Inspector considered the description of Smallfield to still be accurate at the time of the appeal and placed weight on the hierarchy stating that these settlements generally have a higher population than the majority of settlements in the district but lower than urban settlements.
- The crucial factor was the notably lower population size of Smallfield compared to the Main Urban Areas in the hierarchy (population size is relevant). However, if this changed over time since the adoption of the hierarchy this may be a different conclusion.
- It is also significant to note the Inspector’s consideration implied if Smallfield was not a village it would be a large built-up area (i.e all Towns are large built up areas).

Case Law – interpretation of a ‘village’

3.29 Finally, it is considered the following judgements are helpful to note in the interpretation of the definition of a village:

- (On the application of David Tate) v Northumberland County Council [2017] EWHC 664 (Admin) (the ‘*Tate judgement*’) and;
- (Julian Wood) v SSCLG and Gravesham Borough Council [2015] EWCA Civ. 195 (the ‘*Wood judgement*’).

3.30 Both judgements pertained to the Green Belt test of ‘limited infilling in villages’. The “Village” Challenge of the *Tate judgement* is relevant to the consideration of Green Belt purposes and grey belt as it was held (paragraph 25):

*“the question of whether a given settlement is, or is not, a village, is inevitably a matter of planning judgement. **The fact different members of the public, or indeed a different planning authority might take a different view of the matter does not undermine the planning judgement unless it can properly be said to be irrational...**”.*

3.31 Whilst pre-dating the current NPPF and PPG, this chimes with all the Inspectors’ decisions that it is for the decision maker to draw a conclusion on this matter (i.e. a village can be different things to different people and purposes). Paragraph 24 of the judgement HHJ Belcher is particularly useful for framing how this question should be approached as when questioning the Claimant, it was conceded that:

*“it would be open to the planning authority rationally to conclude that was not a village. She also accepted in response to questions from me that **settlements can change their status over time and that it would be open to a planning authority, in appropriate circumstances, to conclude that a settlement which was not previously considered a village, was now a village, or vice versa**”.*

3.32 For context the Claimant had argued that a ‘village’ should be construed strictly to meet certain criteria: a clear core, boundaries, an evolution of different housing types and styles, basic services, highway frontage, or population between hundred and thousands.

3.33 For completeness, in Paragraph 27 of the *Tate Judgement*, HHJ Belcher explicitly stated on this point:

“There is no proper basis upon which I could conclude that any of the criteria is required....In my view Miss Graham Paul’s list is inevitably subjective, and the subjective decisions to be made on the facts of this case are properly to be made collectively by those exercising planning judgement”.

3.34 HHJ Belcher in paragraph 29 also noted that the fact a Neighbourhood Plan was adopted that listed villages did not have the effect of precluding other settlements in the Neighbourhood area as villages.

3.35 The fluidity of this judgement is also supported by the *Wood judgement* where an Inspector had erred in not making their own assessment of whether a parcel was within a village or not by only using adopted Development Plan boundaries as opposed to making their own “on the ground” decision (i.e. a village is not necessarily fixed to its policy boundaries).

3.36 Whilst these judgements are not directly relevant to the interpretation of grey belt considerations, they highlight that what constitutes a village is fluid and may be different for different people, and for different purposes.

Further Commentary

3.37 Based on the above findings, it is also relevant to note Paragraph 83 of the NPPF which pertains to the location of Rural Housing. Explicitly when considering a ‘sustainable development’ it states:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of **rural communities**. Planning policies should identify opportunities for **villages** to grow and thrive, especially where this will support local services. **Where there are groups of smaller settlements, development in one village may support services in a village nearby**”.*

3.38 This policy seeks to locate housing in rural communities which are assumed to be ‘small’ and require the use of services elsewhere. As such, if there is a significant mass of people served by adequate services and facilities within their settlement this would be unlikely to be considered a village or indeed a rural community, echoing the various Inspector’s approaches above.

3.39 When considered in conjunction with the Green Belt PPG emphasising the assessment of ‘urbanising influences’ in relation to large built up areas, it appears that the ‘character’ of a settlement is also relevant, in terms of whether it is a rural community. A more urbanised area with services and facilities would therefore be likely to be a Town or a large built-up area (a rural community is unlikely to form a town).

3.40 The above is helpful for considering how National Policy considers villages being intrinsic to rural areas however, it should be emphasised that paragraph 83 is not in itself Green Belt policy.

Chapter 4

Is Albrighton a Village, Town and/or a Large Built-up Area?

4.1 Based on the above, it is considered that the presence of services and facilities and size are the most relevant considerations in determining whether a settlement is a Village, a Town and/or a Large Built-up Area for the purposes of assessing Green Belts and for considering relevant planning applications.

Facilities and Services

4.2 In the Shropshire context, the Settlement Hierarchy of the adopted Development Plan and its comparison with the Local Plan Update (albeit withdrawn) is relevant, as this serves to provide a historical and contemporary picture of the settlement.

4.3 The adopted Core Strategy (2011) divides Shropshire into Spatial Zones, with Albrighton falling within the Eastern Spatial Zone. Under Policy CS3 Albrighton is identified as accommodating development to meet local needs, respecting its location in the Green Belt explicitly not making any changes to Green Belt boundaries to accommodate this.

4.4 References in CS3 identifying Market Towns include Albrighton as a 'Town' particularly where it is described as a 'foci' and provides services and facilities to its associated hinterlands, indicating that it is more than a village. Table 2 of the Core Strategy explicitly describes Albrighton as a District Centre.

4.5 Further to this point, Policy CS4 of the Core Strategy differentiates 'Community Hubs and Community Clusters' as a stage lower than Market

Towns in the hierarchy which have stricter countryside policy control. With 'clusters' reflective of the relationship envisioned in Paragraph 83 of the NPPF.

4.6 In relation to its services and facilities it should be noted that Albrighton features two supermarkets, a range of restaurants, cafes and pubs/bars as well as other buildings (services) uncharacteristic of rural communities (fire station, train station, skate park).

4.7 While the SAMDev plan makes reference to Albrighton as a village, this does not take away from the 'on the ground' experience of Albrighton which differs from the villages in the area such as Beckbury and Ryton (and elsewhere). It should be noted that to place weight on Policy S1 using the term 'village' in passages would also overlook the name of the policy itself "Albrighton **Town** Development Strategy" and the Settlement hierarchy that informs the Development Plan.

4.8 In relation to the withdrawn Local Plan, the evidence base further supports the consideration of Albrighton as a town. The updated evidence base identifies that Albrighton will have a more important role in the east of the County and is considered a 'key centre' in the updated hierarchy. Explicitly the Hierarchy of Settlements Paper in the evidence confirms that 'key centres' serve a *significant* wider rural hinterland due to their location and range of facilities and services, regular public transport links and or employment opportunities. This goes beyond simply providing services and facilities for its own population (a community hub).

4.9 This point cannot be understated as the Development Plan had specifically identified 'Spatial Zones' in the County. The Eastern Spatial Zone is the only zone with the Green Belt designation and considered the regional importance of Shifnal and Albrighton in the eastern region of the borough. Particularly given their proximity to the strategic road and rail corridors along the M54, A41, A464 and A449 linking to the M6 and to other areas within the West Midlands.

4.10 As such, both the adopted and withdrawn local plan update indicate Albrighton has services and facilities larger than that would be expected in a

community or other rural settlements. The fact Albrighton is the 13th most serviced settlement (with 5 settlements below it in the same category) shows it has a clear distinction from other rural settlements. It is not a relationship where new housing development would be justified by Paragraph 83 of the NPPF and indeed paragraph 4.47 of the Core Strategy acknowledges that the Services and Facilities in Albrighton not only caters for its residents but also the additional military population of the Cosford (where the number of trainees vary from a few hundred to over 4,000 at any one time), as such it has a unique relationship of facilities and services compared to other Market Towns in the borough (being able to serve the needs of potentially double its resident population).

4.11 On this matter it would not be accurate to describe Albrighton as a 'rural community' as described by paragraph 83 but a settlement akin to paragraph 110 of the NPPF which would support "significant development" in terms of patterns of growth (access to facilities and services without the need to drive private motor vehicles).

Size

4.12 When it comes to the size of the settlement, the supporting text to Policy CS3 identifies Albrighton to have a population of 5,100 excluding military personnel. The populations of the Key Centres range from 1,400 – 18,300 across the county (not just within the Green Belt).

4.13 Whilst size alone would not be indicative as to whether a settlement is a village or not, it should be noted that Albrighton appears to be at a mid-point when compared to all the key centres within the CC – having a similar size to Wem and Shifnal. Whitchurch would be the next largest and the population jumps to 8,700.

4.14 The withdrawn Local Plan evidence base used 2011 Census data and found that Albrighton has a population of 4,870 and a dwelling estimate of 2,205.

4.15 When compared with the figures of rural settlements in its hinterlands Albrighton is significantly higher in both population and number of dwellings.

4.16 The number of people and dwellings within Albrighton when viewed in conjunction with its services and facilities leads to the conclusion that it is more than a village – and of a size expected of a town.

4.17 There is no doubt that Albrighton is in fact a ‘built-up area’ (and it is likely this would be a conclusion drawn for all inset towns – as there is a density of development identified to be contained by the policy) and as such consideration of its size is required to ascertain whether it is a ‘large’ built-up area.

4.18 As has been previously stated the PPG only seeks to exclude ‘villages’ from the definition of a ‘large built-up area’ and therefore other settlements of differing sizes could be considered to be a ‘large built-up area’. There is no lower threshold to define ‘largeness’ in the PPG - other than that a large built-up area is not a village. ‘Largeness’ is contextual.

4.19 When looking at the upper thresholds of the largest settlements in the County such as Shrewsbury (population of 75,200 with 33,597 dwellings), Albrighton would not be considered to be large.

4.20 However, comparisons to settlements outside and entirely unrelated to the Shropshire Green Belt would be inappropriate, as the growth of these settlements has not been constrained by the Shropshire Green Belt, which is limited to the south-east of the County.

4.21 Likewise, it should be noted that ‘large built-up areas’ are not defined anywhere else in national policy, it is purely a Green Belt term, and is relevant to prevent the unrestricted sprawl of such areas (the only other reference to a built-up area is the definition of Previously Developed Land but this has no relevance to largeness). Therefore, a ‘large built-up area’ has to be relevant to the application of Green Belt policy.

4.22 The only inset 'Key Centres' within the Shropshire Green Belt are Albrighton, Shifnal and the eastern portion of Bridgnorth (east of the River). The smaller settlements in the Green Belt that are inset are Alveley, Beckbury, Claverley and Worfield.

4.23 As per the 2020 Settlement Hierarchy Paper informing the withdrawn Local Plan, the sizes of these 'inset' settlements are as follows:

Table 4.1: 'Inset' settlement sizes

Settlement	Settlement Population Estimate	Dwelling Estimate
Bridgnorth*	13,028	6,189
Shifnal	6,991	3,215
Albrighton	4,870	2,205
Alveley	1,583	718
Claverley	559	242
Worfield	315	155
Beckbury	224	97

*Figures for Bridgnorth are for entire settlement not just area in the Green Belt

4.24 Bridgnorth, Shifnal, Albrighton are significantly larger than the other inset settlements. In the context of the Shropshire Green Belt, they would be considered to be 'large', particularly in conjunction with the facilities and services being reflective of a settlement designed to accommodate the needs of smaller settlements (being 'foci' in the region to their hinterlands). In the case of Albrighton this also include the population in neighbouring Cosford RAF station.

4.25 Therefore, in comparison to the other built-up areas in the Shropshire Green Belt, Albrighton can be considered to be large.

4.26 Albrighton's form and density, as well as its size, also suggest that it can be considered a large built-up area. Notably, permission has recently been approved for 150 new dwellings in what was considered to be 'safeguarded land' to the east of the settlement (beyond a scheme of 65 units granted permission in 2015). This 'growth' is a trend that is acknowledged in the Neighbourhood Plan 'Lite', where historically the growth of Albrighton was limited until the 1960s owing to the introduction of the A41 Albrighton bypass and significant expansion occurred through major housing development.

4.27 Growth in the smaller settlements has been of more limited scale, resulting mainly from 'infilling'. Albrighton, in contrast, has seen historical extensions to the north, south-west and now east of the settlement.

Conclusion

4.28 Owing to its size and levels of services and facilities, Albrighton should be considered a town for the purposes of a Green Belt assessment. Regardless of references to Albrighton being a village in various documents, its size, characteristics and role in the County clearly distinguish it from smaller settlements. These references to a 'village' also have to be considered against other references to Albrighton being a 'market town'.

4.29 Case law acknowledges that members of the public or other Planning Authorities may have their own views on what is a village, but ultimately it is a matter of planning judgment – whilst Albrighton may have historically been considered to be a village at one point in time it has experienced significant growth over time, resulting in a very different role and built form to other rural settlements in the county. As this statement indicates, in LUC's judgment, there is a clear difference between Albrighton and other smaller settlements in terms of services and facilities, size and this justifies its description as a town.

4.30 It is also considered Albrighton should also be considered to be a 'large built-up area' for Green Belt assessment purposes. It is larger and more intensely more built-up than other settlements inset within the Shropshire Green

Belt and the Eastern Spatial Zone which in this context could only be considered to be 'large'.

Report produced by LUC

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