

Green Belt Assessment

Land at Patshull Road, Albrighton

On behalf of Boningale Developments Limited

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Document Management.

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Contents.

1. Introduction.....	4
2. Site Contribution to Green Belt Purposes A, B and D.....	7
3. Effect of the Proposed Development on the Purposes of the Remaining Green Belt.....	10
4. Accessible Green Space.....	12
5. Harm to Openness of Green Belt.....	16
6. Summary and Conclusions.....	23

Appendices.

APPENDIX 1 – GREEN BELT PLAN

APPENDIX 2 – GREEN BELT FLOWCHART

APPENDIX 3 – OFFICER REPORT FOR COMMITTEE: APPLICATION 5/2023/0327

APPENDIX 4 – OFFICER REPORT FOR COMMITTEE: APPLICATION 2022/3427

APPENDIX 5 – OFFICER REPORT FOR COMMITTEE: APPLICATION 24/00762/OUT

APPENDIX 6 – ENVIRONMENTAL DESIGNATIONS PLAN

APPENDIX 7 – ZONE OF THEORETICAL VISIBILITY

APPENDIX 8 – VIEWPOINT LOCATION PLAN

APPENDIX 9 – PHOTOVIEWS

APPENDIX 10 – ILLUSTRATIVE LANDSCAPE MITIGATION PLAN



1. Introduction

- 1.1. This report has been prepared on behalf of Boningale Developments Limited, to support an outline planning application on a 47.29 hectare site for up to 800 dwellings on the southern edge of the village of Albrighton (hereafter known as the 'Site'). The Site is located within the administrative area of Shropshire (see **Appendix 1**).
- 1.2. The proposed development relates to land within the Green Belt that is assessed to be Grey Belt land under the new NPPF published in December 2024¹ and with reference to Planning Practice Guidance on Green Belt published on the 27th February 2025. A flow chart illustrating how Green Belt sites for major development are assessed to be Grey Belt land and subsequent tests for Appropriateness and Very Special Circumstances is set out at **Appendix 2**. The flow chart illustrates five main steps as follows:
- 1. Does the site make a strong contribution to Green Belt Purposes a, b, or d?** This is covered in **Section 2** of this report.
 - 2. Are there any strong reasons for restricting development with reference to NPPF (2024) footnote 7?** These are set out in a separate report by Marrons Planning² where it is concluded that the proposed development is not restricted by footnote 7 constraints.
 - 3. Are all the NPPF (2024) Paragraph 155 tests met?** This is the appropriateness test and includes establishing whether the proposed development would have any fundamental impact in terms of undermining the purposes of the remaining Green Belt which is covered in **Section 3** of this report. Other paragraph 155 elements related to demonstrable need and sustainable location are covered in the separate report by Marrons Planning², where it is concluded that there is a demonstrable need for the proposed development and the site is in a sustainable location.
 - 4. Can the proposal meet all of the NPPF Golden Rules?** The rule related to accessible green space is covered in **Section 4** of this report. Other Golden Rules relating to affordable housing contributions and necessary infrastructure improvements are covered in the separate report by Marrons Planning², where it is concluded that the affordable housing contribution and infrastructure improvements as part of the proposed development would comply with the NPPF Golden Rules.
 - 5. Do the proposals meet the Very Special Circumstances Test?** Given that a decision maker/s may disagree with the assessment of the Site as Grey Belt, it is also relevant to consider whether Very Special Circumstances exist that would clearly outweigh any harm in the planning balance. Harm to the spatial and visual openness of the Green Belt is assessed at **Section 5** of this report. Other planning considerations related to Very Special Circumstances are covered in the separate report by Marrons Planning.²
- 1.3. The approach to identifying Grey Belt and establishing whether a proposed development is inappropriate or not has been recently clarified on a wide range of schemes since publication

¹ As assessed by Pegasus Group against the criteria contained in the revised NPPF and with reference to several key appeal decisions that provide additional clarity on the Grey Belt definition.

² Report by Marrons Planning: Planning Addendum: Implications of revised national policy and the Golden Rules

of the revised NPPF. Some recent decisions made by Planning Officers and Planning Committees at **Appendix 3 to 5**, are summarised below.

1.4. 5/2023/0327: Land At Cooters End Lane And Ambrose Lane Harpenden, Hertfordshire

Key points from Officers committee report (St Albans District Council) (see **Appendix 3**):

Outline application for up to 550 dwellings approved at planning committee.

8.1.13. – Green Belt report prepared for the Council conclude to be a policy making rather than decision taking tool.

8.1.15 – Large built up areas identified as towns (London, Luton, Dunstable and Stevenage). Site makes limited or no contribution towards checking sprawl.

8.1.21 – describes the role of new woodland park in providing a strongly defined and durable boundary edge [to the revised Green Belt] and use of park, allotments and sports pitches as part of the defined green edge that can be protected in perpetuity from future development through a S106 agreement.

8.1.31- concludes that the site does not strongly contribute to any of purposes (a), (b) or (d) in NPPF Paragraph 143. Site is considered Grey Belt.

8.1.33. The site would only comprise 0.18% of the Green Belt within the District and has a relatively localised impact. Considered that the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

8.1.41 The proposal would therefore comply with all of the ‘golden rules’ set out within paragraphs 156 and 157 of the NPPF.

8.1.43. Officers consider that the proposed development is appropriate development in the Green Belt as it would utilise ‘grey belt’ land and would accord with the requirements set-out in Paragraphs 155 to 159 of the NPPF.

8.1.44. If the Site is not considered Grey Belt, then para 153 of the NPPF dictates that inappropriate development is harmful and should not be approved except in very special circumstances. Under this scenario harm to the Green Belt would be assessed and weighed against other considerations (including harm to its openness).

8.1.51. Notwithstanding the proposed landscape enhancements, the proposed development would result in significant harm to the openness of the Green Belt. In this scenario, this harm, in addition to the harm by inappropriateness, carries substantial weight against the proposals.

The Officers Report recommending approval of the scheme was agreed by the majority of Members.

1.5. 2022/3427: Mixed use Development of former Weylands Treatment Works

Key points from Officers committee report (Elmbridge Borough Council, Surrey – see **Appendix 4**):

para 2.1 – original reason for refusal No. 1 assessed the proposed development was inappropriate development in the Green Belt.

paras 3.2 – 3.20 – in light of the revised NPPF it was considered the site does not contribute strongly to purposes a, b or d and consequently qualifies as Grey Belt land.

para 3.24 – Green belt integrity tests of all purposes considers the wider impact of the proposals across the whole plan area and complies with para 155a of the NPPF.

para 3.36–3.45 – Analysis that the development would comply with accessible green space test in line with paragraph 156c of the NPPF.

para 4.1 – Concludes the proposals would not be inappropriate development and consequently the Green Belt reason for refusal could no longer be supported at Appeal due to the revised NPPF.

The Officers Report was unanimously agreed by the Members.

1.6. 24/00762/OUT Residential development of up to 250 dwellings on Land off Laindon Road, Billericay

Key points (see Officers Report at **Appendix 5**):

para 2.1.2 – site does not currently include any development and part of the site boundary lies adjacent to the Billericay Conservation Area.

Para 5.1.4 to 5.1.8 – Concludes site is Grey Belt.

Para 5.1.46 – Sets out a summary of the applicants assessment on Green Belt Purposes.

Para 5.1.47 – restates the Grey Belt conclusion and also confirms no footnote 7 breaches.

Para 5.1.48 – Proposals would not fundamentally undermine the purposes of the remaining Green Belt area across the area of the Plan and therefore complies with paragraph 155(a) of the NPPF.

Para 5.1.54 – Proposals would include a good level of green space available to future and existing residents, thereby complying with NPPF para 156 (c). Other Golden Rules also met as set out in paras 5.1.52 and 5.1.53.

Paras 5.1.59 – Explains why it is necessary to consider Very Special Circumstances Test if members were to take a different view on grey belt judgement.

Section 5.19 – Sets out the Very Special Circumstances case. Officers consider the very special circumstances put forward in this case clearly outweigh the potential harm to the Green Belt such that very special circumstances are said to exist.

2. Site Contribution to Green Belt Purposes A, B and D

Shropshire Green Belt Assessment (2017-2019).

2.1. The Shropshire Green Belt Assessment (SGBA) was prepared by LUC in 2017³ and was followed in 2019 by the Shropshire Green Belt Review: Stage 2 (SGBR). Parcel 36 including the Site covers 106.4ha, with the Site at 47.3ha comprising approximately 44.5% of the parcel.

2.2. The aim of the SGBA is defined at paragraph 1.8 as:

"... The overall aim of this assessment is therefore to provide Shropshire Council with an objective; evidence-based; and independent assessment of how the Shropshire Green Belt contributes to the five Green Belt purposes, as set out in national policy."

2.3. The aim of the SGBR is defined at paragraph 1.11:

"The aim of the Stage 2 Green Belt Study is to undertake an independent, robust and transparent assessment of the potential harm of releasing Green Belt land within 29 identified Opportunity Areas"

2.4. The objectives are stated to be:

- ***"Present the findings of the Stage 1 Green Belt Study and the performance of the identified parcels around settlements against the five nationally defined purposes of the Green Belt as set out in the NPPF."***
- ***Provide clear conclusions on the potential degree of 'harm' that may occur if parcels and Opportunity Areas were to be released from the Green Belt. This takes into account both the contribution of the areas to the Green Belt purposes and the potential impact on the wider integrity of the Green Belt and Green Belt boundaries if they were to be released."***
- ***Outline what potential 'design principles' could be applied to the Opportunity Areas that have been assessed to minimise potential harm to the wider Green Belt."***

2.5. The report goes on to state at paragraph 1.13:

"Direct and indirect environmental and sustainability effects of development in the Green Belt, such as impacts on landscape quality, biodiversity value, heritage impacts, flooding, traffic generation, infrastructure requirements are not considered as part of this Study. However, such issues are important considerations in establishing the necessary 'exceptional circumstances' for making alterations to Green Belt boundaries. These matters will be considered and evidenced separately by Shropshire Council"

³ LUC (Sept 2017) – Shropshire Green Belt Assessment – Final Report

Contribution of the Site to Green Belt Purposes A, B and D

- 2.6. Appendix 1 of the SGBR covers an assessment of Parcel S36, which contains the Site and a larger area of land to the east. Whilst it is concluded that the majority of the LUC assessment conclusions for the wider parcel also apply to the Site, there are some important differences in assessment which reflect the smaller extent of the Site within Parcel S36.

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

- 2.7. The SGBR rates Parcel P36 as **No contribution**, stating:
- " This parcel does not lie adjacent to a large built-up area and therefore makes no contribution to Purpose 1."*
- 2.8. The same conclusions apply to the Site. It is relevant to note that the PPG (Feb 2025) identifies under purpose a that **"Villages should not be considered large built up areas."**

Purpose B: To prevent neighbouring towns merging into one another

- 2.9. The SGBR rates Parcel P36 as **Weak**, stating:
- "This parcel is located adjacent to the settlement of Albrighton and lies between the settlements of Telford and Wolverhampton. Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements."*
- 2.10. The NPPF is specific in its terminology about this purpose, citing towns specifically rather than other types of settlement such as villages and hamlets. It is relevant to also note that the PPG (Feb 2025) identifies under purpose b that **"this purpose relates to the merging of towns, not villages "**.
- 2.11. It is assessed that the Site has **No contribution** to the Green Belt purpose of preventing the merging of neighbouring towns, as there would be no reduction in the gap between the towns of Telford and Wolverhampton. This judgement is supported by the LUC conclusion for Parcel P36 that the *"loss of openness would not be perceived as reducing the gap between settlements"*.

Purpose D: To preserve the setting and special character of historic towns

- 2.12. The SGBR rates Parcel P36 as **Strong**, stating:
- "Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement areas located within Albrighton/Donington. In practice, a small portion of the northeastern corner of the parcel is located partially within the Albrighton Conservation Area, with the openness of the land within this parcel playing a major role in its setting. Therefore much of the parcel is considered to contribute positively to the historic significance of Albrighton and its special character. It should be noted that the land located along the settlement edge in the north-west of this parcel has no intervisibility with the Albrighton Conservation Area or any other historic settlement areas assessed under Purpose 4 [D]. It therefore does not play a key role in the immediate setting of these historic settlements and performs a weaker role under Purpose 4 [D]."*

2.13. Albrighton is a large village, not a historic town, however if it was considered that the Albrighton Conservation Area as part of a settlement outside the Green Belt, was relevant to this purpose, then the assessment for the Site is notably different to the wider Parcel P36. This judgement is reached because the wider Parcel P36 includes countryside east of Newhouse Lane including part of the Albrighton Conservation Area and there is no intervisibility between the designation and the Site. The separate Heritage Statement by Pegasus concludes:

"It was confirmed during the site walkover that views towards the Site from the southern designation boundary are wholly screened by virtue of spatial separation in combination with intervening vegetation and undulating topography. Meanwhile views from all other areas are screened by built form. The Albrighton Conservation Area has therefore been excluded from further assessment".

2.14. The separation of the Site from the Boningale Conservation Area to the south of the Site, that comprises a small village (not town) and is washed over by the Green Belt designation, is noted. It is relevant to note that the PPG (Feb 2025) identifies under purpose d that **"this purpose relates to historic towns, not villages "**.

2.15. In conclusion it is assessed that the Site has **No contribution** to the Green Belt purpose of preserving the setting and special character of historic towns.

Grey Belt conclusions on contribution of the Site to Purposes a, b and d

2.16. The Site is assessed to have no contribution to Purposes a, b and d of the Green Belt. Marrons Planning conclude⁴ that there are no strong reasons for restricting development (NPPF footnote 7), and consequently it is assessed that the Site is Grey Belt.

⁴ Report by Marrons Planning: Planning Addendum: Implications of revised national policy and the Golden Rules

3. Effect of the Proposed Development on the Purposes of the Remaining Green Belt

3.1. As stated at paragraph 155a of the NPPF (2024):

'The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

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...'

As set out in Section 1 of this report, the other planning considerations set out under paragraph 155 of the NPPF are dealt with by Marrons Planning⁵

3.2. In relation to Purpose a, it is considered that the Site has no contribution to checking the unrestricted sprawl of large built-up areas as the Site does not lie next to a large built-up area, consistent with the SGBR conclusion for the wider Parcel P36. The addition of the proposed development on the Site would consequently not have any effect on this purpose.

3.3. In relation to Purpose b of preventing the merging of neighbouring towns, the SGBR concludes that Parcel P36 has a weak contribution, however it also states that *'loss of openness would not be perceived as reducing the gap between settlements'* It is judged that the Site itself would have no contribution to the merging of towns as there would be no reduction of the gap between the towns of Telford and Wolverhampton. The addition of the proposed development on the Site would consequently not have any effect on this purpose.

3.4. In relation to Purpose c: To assist in the safeguarding of the countryside from encroachment, it is agreed with the SGBR that the Site, like the wider Parcel P36, would have a moderate contribution to this purpose given that it has the characteristics of countryside. However, it should be acknowledged that the most sustainable locations for development will invariably be adjacent to existing settlements that typically comprise countryside. Therefore, in the interests of promoting sustainability, there is an almost inevitable conflict with this Green Belt purpose. It is relevant to note this Purpose is specifically omitted from the NPPF (2024) glossary definition of Grey Belt.

3.5. In relation to Purpose d: to preserve the setting and special character of historic towns, contrary to the conclusions of the SGBR for the wider Parcel P36, it is assessed that the Site has no contribution to this purpose. The principal reasons for the difference in assessment is the lack of intervisibility between the Site and the Albrighton Conservation Area that partly lies within the eastern part of the wider Parcel P36, well beyond the Site boundary. The separation of the proposed development from the Boningale Conservation Area to the south of the Site, that comprises a small village (not town) and is washed over by the Green Belt designation, has also been considered. The iterative masterplanning process, informed by the baseline heritage appraisal prepared by Pegasus Group, resulted in specific mitigation measures being adopted to account for the conservation area that comprised exclusion of built development at the southern end of the Site closest to the conservation area and a

⁵ Report by Marrons Planning: Planning Addendum: Implications of revised national policy and the Golden Rules

substantial woodland belt along the southern boundary of the Site, adjacent to the A464. The addition of the proposed development on the Site would consequently not have any effect on this purpose.

- 3.6. In relation to Purpose e: To assist in urban regeneration by encouraging the recycling of derelict and other urban land, whilst it is agreed with the SGBR that all parcels (and the Site) make an equally significant contribution to this purpose it should be noted that brownfield land in Shropshire is limited and does not make a substantial contribution to meeting housing need. The online Brownfield Land Register records that there are only 82.56 hectares of brownfield land registered in the county (excluding sites with planning permission). All sites are under 5 hectares in size, apart from a single 50+ hectare site (i.e., Clive Barracks, already allocated as a Strategic Site in the Shropshire Pre-Submission Draft Local Plan (2020)). The majority of sites are well under a hectare in size⁶.

Overall Harm judgements resulting from proposed development including mitigation

- 3.7. The SGBR concludes, with respect to release of Parcel P36 (of which the Site comprises less than half the area):

***“This parcel contains a limited amount of built development and is strongly associated with the wider area of open countryside to the south of Albrighton. Releasing this parcel from the Green Belt would lead to a significant level of encroachment on the countryside and a weakening of the neighbouring areas of Green Belt land. The openness of the land within the east of the parcel plays an important role in preserving the setting of the historical settlement area within Albrighton. Releasing Parcel P36 would compromise the role this Green Belt land is playing with regard to Purpose 4. It is considered that the release of this parcel as a whole from the Green Belt would lead to a High level of harm to the Green Belt in this local area.*”**

A sub-parcel has been identified within Parcel P36 that would lead to a lower level of overall harm to the Green Belt if it was to be released. Sub-parcel P36 comprises a series of small fields in the north-western extent of the parcel, adjacent to the settlement edge of Albrighton. The sub-parcel is contained on two sides by the settlement edge. The sub-parcel is more closely associated with the settlement edge than land within the wider countryside to the south. Releasing this parcel from the Green Belt would be unlikely to significantly weaken the role neighbouring areas of land are playing as Green Belt with regard to Purpose 3. The Sub-parcel also does not play a significant role in contributing to the setting of the historic settlement. It is considered that the release of this sub-parcel from the Green Belt would lead to a Moderate level of harm to the Green Belt within this area.”

- 3.8. The release of the Site from the Green Belt comprising less than half of the Parcel P36 area would have a lower level of harm than the whole Parcel for the following reasons:

⁶ Shropshire Brownfield Register [website accessed 21/02/25:
<https://www.shropshire.gov.uk/media/18082/brownfield-land-register-part-1.pdf>]

- a) The Site has no contribution to Green Belt purposes a, b and d and the proposed development would not fundamentally undermine these purposes when considered with the remaining purposes c and e;
- b) The impact upon Green Belt openness, both spatially and visually of the proposed development would be localised due to the nature of the surrounding topography, built development and retained planting; and
- c) The landscape mitigation measures adopted, and the defensible new boundaries to the Green Belt would be stronger than are currently present at the existing settlement edge.

Conclusion

- 3.9.** It is concluded that the proposed development would comply with paragraph 155a of the NPPF, because the structured analysis above demonstrates that the proposals "*would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.*"

4. Accessible Green Space

4.1. The 'Golden Rules' at NPPF (2024) paragraph 156c states that major development should include *"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"*.

4.2. Central Government advice set out in Planning Practice Guidance Note (Paragraph 002 Reference ID:65-002-20190722) also states:

"Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

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

4.3. The SGBR states at paragraph 5.2:

"One of the factors weighed up in the judgement of harm resulting from the release of a Green Belt area, is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would rate in terms of its contribution to Green Belt purposes were the area in question to be urbanised i.e. would its contribution be lessened? In many cases this is a key factor in the judgement: a site might in itself be small, but its development could represent a more significant change than its physical area might suggest if, for example, this resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land."

4.4. **Table 1** below describes how the proposed development would comply with NPPF (2024) paragraph 156c in the delivery of accessible green space together with other landscape mitigation matters (see Illustrative Landscape Masterplan contained at **Appendix 10**).



Table 1: Mitigation measures adopted as part of the proposed development that minimise harm to the wider Green Belt

Mitigation Measure*	Benefits*	Considerations*	Site specific measures proposed by Pegasus (see Appendix 10)
1. Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance.	Maintaining sense of separation between urban and open land.	A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of 'breaches' in such boundaries.	A woodland belt proposed along the existing hedgerow to the southern and eastern boundary of the Site will maximise consistency over a longer distance where currently the Green Belt boundary is formed by the built-up southern edge of Albrighton.
2. Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt.	Reducing perception of urbanisation and may also screen residents from intrusive landscape elements within the Green Belt (e.g. major roads).	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents.	A woodland belt proposed along the southern and eastern boundaries would reduce the perception of urbanisation from most locations in the wider Green Belt.
3. Create a transition from urban to rural, using built density, height, materials, and landscaping to create a more permeable edge.	Reducing perception of urbanisation.	This may however have implications in terms of reducing housing yield.	Reduction in perception of urbanisation by allocating approximately 37% of Site to landscaping and creating a more permeable settlement edge adjacent to new public open space creates a gentler transition than the current often sharper transition between housing and farmland.
4. Consider ownership and management of landscape elements which contribute to Green Belt purposes.	Ensuring permanence of Green Belt.	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).	All strategic landscaping including woodland belt, community orchard and tree planting beyond the development plots would be within public open space and not under private control.



Mitigation Measure*	Benefits*	Considerations*	Site specific measures proposed by Pegasus (see Appendix 10)
<i>5. Use sustainable drainage features to define/enhance separation between settlement and countryside.</i>	<i>Strengthening separation between urban and open land.</i>	<i>Need to determine if local topography and ground conditions are suitable.</i>	SUDs features have been used close to the new Green Belt boundaries to the south of the Site to enhance separation between the settlement and associated public open space and the wider countryside and Green Belt.

*As reproduced from Table 5.1 of the SGBR

5. Harm to Openness of the Green Belt

Introduction

- 5.1. This section of the report considers how the removal of the Site, and the addition of the proposed development would have a bearing upon the openness of the Green Belt and as such, considers several factors including spatial and visual aspects, and the degree of activity, in addition to the baseline, likely to be generated by the proposed development.
- 5.2. A conclusion is then reached on whether, in accordance with paragraph 155a of the NPPF, the proposed development would result in a fundamental undermining of the purposes (taken together) of the remaining Green Belt land. The overall judgement is set out in Section 4 of the report taking into account the mitigation measures proposed, including the redefinition of the Green Belt boundary.

NPPF and PPG

- 5.3. Green Belt is addressed in the NPPF (2024) in section 13 of the document. The essential characteristics of Green Belts are their openness and their permanence. Further guidance is provided as to what factors can be considered when assessing the potential impact of development on the openness of the Green Belt which is documented in Planning Practice Guidance at paragraph 001 Reference ID: 64-001-20190722. This paragraph notes that assessing the impact of a proposal on the openness of the Green Belt, requires a judgement based on the circumstances of the particular case. By way of example, the courts have identified several matters which may need to be considered in making this assessment. These include, but are not limited to:

“Openness is capable of having both spatial and visual aspects – in other words the visual impact of the proposal may be relevant, as could its volume.”

The duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and

The degree of activity likely to be generated, such as traffic generation”

(underlined – our emphasis)

Pegasus assessment approach

- 5.4. A field assessment of the local landscape and visual context was undertaken in March 2024 by Chartered Landscape Architects to provide a more informed analysis concerning visual openness.
- 5.5. An Environmental Designations Plan at **Appendix 6** illustrates where Green Belt land beyond the Site coincides with environmental designations that may indicate a higher landscape value. A Zone of Theoretical Visibility (ZTV) at **Appendix 7** and viewpoint location plan at **Appendix 8** is accompanied by annotated photoviews at **Appendix 9**. This evidence base informs the judgements on the baseline visual openness of the Site, which are described at Section 3 of this report, and enables professional judgements to be made concerning the effects upon the openness of the Green Belt with the proposed development in place.

- 5.6. The report summarises the baseline perception of the existing openness of the Site, from all directions within the surrounding landscape. Conclusions are then reached on how this baseline openness would be affected by the removal of the Site from the Green Belt and the development of up to 800 dwellings, secondary school, local centre, and care home (all buildings up 12.3m high, equivalent to 2.5 storey housing).

Spatial Aspect of Openness

- 5.7. The spatial aspect, as it relates to the sense of openness with regard to the Site, is informed by several factors including the relationship of the Site to the existing settlement and the robustness of any revised boundaries to the Green Belt, following removal of the Site from the designation.
- 5.8. The Shropshire Green Belt Assessment – 2017 (SGBA) and the Shropshire Green Belt Review: Stage 2 – 2019 (SGBR) were prepared by LUC on behalf of Shropshire Council. In the SGBR Parcel 36 including the Site covers 106.4ha, with the Site at 47.29ha comprising approximately 44.5% of the parcel.
- 5.9. In the wider context, the SGBA reports at paragraph 2.45 that in 2015/2016 Shropshire contained around 24,480 hectares of Green Belt land. The Site therefore only comprises 0.2% of the Green Belt within Shropshire.
- 5.10. The density of the proposed development is slightly higher than the density of the existing post-war housing estates on the southern edge of Albrighton. This is to be expected given the NNPF direction at paragraph 128 that development should make efficient use of land. Proposed building heights of up to 2.5 stories would be similar to some of the larger buildings in the locality, noting it is anticipated the majority of the proposed dwellings would be 2-storeys in height.
- 5.11. In conclusion, the removal of the Site from the Green Belt would have an inevitable effect upon the spatial aspect of Green Belt openness, however the proposal would:
- a) cover only 0.2% of the Green Belt within Shropshire;
 - b) be physically well related and connected to the existing adjoining village edge to the north, including safeguarded land and potential development land controlled by another developer;
 - c) comprise a notable extension of Albrighton that takes into account existing densities and building heights and would be in keeping with the historical pattern of substantial outward village growth. The expansion occurred relatively recently during the latter part of the 20th century with extensive development of modern housing estates west and southwest of the historic core;
 - d) include notable areas of undeveloped land as public open space, incorporating existing planting and enhancing green infrastructure including public access; and
 - e) the new Green Belt boundaries would follow existing features on the ground including road corridors where existing hedgerows and tree planting would be predominantly retained. The site boundaries including the new access road at the southeast corner of the site would be reinforced by new planting, typically comprising woodland belts.

Visual Aspect of Openness

- 5.12. The visual openness of the Green Belt considers the visual links of a Site or area such as a Green Belt parcel, to the wider Green Belt, intervisibility between settlements, and potential impacts on wider ranging views across the Green Belt.
- 5.13. The Site has very limited public access, restricted to the southeast corner where a public footpath crosses the proposed access road. The mature hedgerow and tree planting along the majority of the site perimeter, combined with the relatively flat landform and limited public access, limits views of the Site. The visual aspect of the perception of openness as it relates to the Site can be most readily appreciated from locations where members of the public have access and are able to pass through this environment and therefore this relates primarily to public rights of way and highways. Mindful of this, it is considered that an evidence base is required, informed by a field survey, to document how the sense of openness is appreciated from both public highways and rights of way in the locality.
- 5.14. The Zone of Theoretical Visibility (ZTV) in **Appendix 7** has modelled a maximum built development envelope within the proposed development cells on the Site (to represent 2.5 storey dwellings). The ZTV model does not account for existing hedgerow vegetation or tree cover beyond woodland blocks, and consequently the resulting ZTV plan provides an exaggerated depiction of likely visibility that requires review in the field. It should also be considered that most land covered by the ZTV within the Green Belt is private farmland, whereas the Green Belt assessment is necessarily focused on publicly accessible locations where a perception of openness associated with the Site may be available. The field survey, undertaken in winter/early spring when intervisibility is least restricted, recorded a range of photoviews, the location of which are illustrated at **Appendix 8** with the annotated photoviews reproduced within **Appendix 9**.

Visual Aspect of Openness as perceived from the north

- 5.15. The perception of openness of the Site from the adjacent built-up area of Albrighton to the north, is geographically restricted in terms of the very localised area from where the Site can be appreciated and the limited proportion of the Site visible. There would only be localised opportunities for people to appreciate the openness of the Site from public highways, (**Viewpoints 1 and 2**) where views are typically restricted by roadside hedgerows and tree planting, even in winter. Whilst roadside hedgerows typically limit the opportunities to perceive a sense of openness associated with the Site, there are fleeting opportunities for views where occasional breaks in the roadside hedgerow occur. For example, road users can appreciate the openness of the southwestern fields of the Site from a specific location at the western end of Cross Road (**Viewpoint 3**).
- 5.16. With the proposed scheme in place there would be clear views of the proposed residential development set behind a community green space at the northern end of the Site (**Viewpoint 1**) and also in views across the Site from the northern end of Cross Road resulting from the removal of the roadside hedgerow and creation of a new footway and vehicular access. The proposal would result in a localised reduction in openness, noting openness is currently limited by the hedgerow and the changes would be perceived in the context of existing dwellings along Cross Road. The proportion of new built development perceived would also decrease over time from the growth of the proposed hedgerow and tree planting set behind the new footway.

- 5.17. Further north of the Site, the undulating landform gently rises to a local ridgeline, where views towards the Site are theoretically available, but in reality are fully screened by tall hedgerows along Green Lane, reinforced by intervening field boundary planting north of Cross Road. At the local highpoint on Windmill Lane (**Viewpoint 4**), users of the Cross Britain long distance footpath would have no appreciation of the sense of openness associated with the Site and this would not change with the proposed scheme in place.
- 5.18. Northeast of the Site along the northern end of Newhouse Lane, views towards the Site are screened by roadside hedgerows and intervening planting. A public footpath on slightly elevated land is located south of Albrighton Primary School (**Viewpoint 5**), however from this route the greatest contribution to the appreciation of openness of the countryside, apart from the field containing the footpath, is the land to the north of the Site identified for potential development and within the control of another developer. With the proposed scheme in place, an appreciation of the openness of the Site which would be restricted by the existing mature hedgerows and trees along the site boundary, would be largely prevented should the intervening potential development controlled by another developer be implemented.

Visual aspect of openness as perceived from the east

- 5.19. An appreciation of Green Belt openness from Patshull Road that passes between the two parcels of the Site is typically restricted to the east by a combination of hedgerows and fencing close to Patshull Road, within the gardens of residential properties that form intermittent ribbon development along the highway. Views of the Site to the west from Patshull Road are also frequently restricted by hedgerow planting, however for approximately 200m of the route, there is a greater appreciation of the openness of the Site where there are intermittent gaps in the roadside hedgerow (**Viewpoint 6**). With the addition of the proposed development there would be a localised loss in visual openness for this stretch of the route. Over time the growth of the proposed infill planting that would plug the majority of gaps in the existing hedgerow, whilst restricting views of the new built development, would decrease the perception of the openness of the Site to a localised degree from Patshull Road.
- 5.20. The openness of the Green Belt can be appreciated from Public Rights of Way (PRoW) crossing open countryside at the southeastern end of the Site (**Viewpoints 7 and 8**), including the field that accommodates the proposed road corridor east of Newhouse Lane. The proposed development would have a notable effect in reducing the perception of openness of the Site. The growth of proposed woodland planting, whilst reducing the proportion of built development and the access road visible, would also reduce the contribution that the Site has to the open character of the Green Belt as perceived from these PRoW.
- 5.21. The perception of the openness of the Site approaching it from along the A464 Holyhead Road to the east is restricted by intervening landform, vegetation, and buildings. Approaching the junction with Church Lane, approximately 400m southeast of the Site there are less restricted views towards the southern end of the Site (**Viewpoint 9**), although only land east of Newhouse Lane that accommodates the proposed access is apparent. The addition of the proposals would initially comprise the movement of vehicles on the new access road and the upper parts of new buildings, however over time these would be increasingly screened by the growth of intervening woodland planting. Relative to the baseline, long term views of woodland planting, whilst reducing the open character of views

would not restrict any wider appreciation of the openness of the Green Belt from the A464 Holyhead Road.

5.22. Further to the east of the Site, the undulating landform gently rises and an intermittent appreciation of the openness of the Green Belt Site is experienced from localised parts of the PRow network (**Viewpoint 10**). Whilst there would initially be a reduction in the appreciation of openness associated with the Site from localised sections of the PRow network, the growth of mitigation woodland planting at the southeastern edge of the Site would restrict the proportion of new built development visible over time. This change would slightly reduce the limited proportion of open fields visible that comprise the Site, however the change would be consistent with the character of the wider landscape pattern of woodland blocks and belts. There would be no material effect upon the visual openness of the Green Belt designation as a whole.

5.23. Opportunities for longer range appreciation of the openness of the Site from publicly accessible locations further east are very limited due to multiple layers of intervening planting. Restricted views include a short section of public footpath west of Lower Pepperhill (**Viewpoint 11**), and the bridleway north of Wrottesley Lodge Farm, in the neighbouring county of Staffordshire (**Viewpoint 12**). In all cases the introduction of the proposed development on the Site would be barely perceptible and would have only a slight adverse effect upon the perception of openness of the Green Belt. Visibility would be further reduced by the growth of mitigation woodland planting that would be consistent with the pattern of open fields and areas of woodland already perceived across the Green Belt from these more distant locations from the Site. There would be no material effect upon the visual openness of the Green Belt designation as a whole.

Visual aspect of openness as perceived from the south

5.24. The southern boundary of the Site follows the A464 Holyhead Road corridor and there are fleeting views of the Site above a low clipped field boundary hedgerow for road users travelling in both directions (**Viewpoints 13 and 14**). Scattered dwellings adjacent to the Site are partially screened by garden planting. With the proposed development in place there would be a localised reduction in the perception of openness, noting that fleeting views of built development over time would be reduced by woodland planting.

5.25. Directly south of the A464 that passes the Site boundary, woodland defines the northeastern edge of the Boningale Conservation Area and a mature hedgerow with trees is located along the northwestern edge of the designation. The planting restricts opportunities for an appreciation of the openness of the Site. Further south within the historic core of the settlement, views from Church Lane towards the Site are typically fully restricted by tall hedgerows and intervening tree cover with limited glimpses towards the southern boundary available (**Viewpoint 15**). Further west at the junction of Church Lane and Patshull Road, roadside hedgerows provide an almost continuous screen with rare glimpses towards the Site available e.g. over field gates (**Viewpoint 16**). The introduction of the proposed development would have a limited effect upon the perception of openness of the Site from the settlement of Boningale, given that new built development would be typically set back circa 140m from the A464 Holyhead Road behind new planting. The proposed woodland belt along the southern boundary of the Site would reduce the extent of new built development visible from the settlement, also slightly reducing the sense of openness, although this change would be consistent with the wooded character of the landscape that the settlement is located within.

- 5.26. West of the settlement of Boningale along the A464, the heavily treed grounds of Lea Hall and Lea House, initially restrict an appreciation of the openness of the Site. Further west along the A464, the Site boundary is defined by a roadside hedgerow which is continuous in nature and largely prevents views of the ground level of the Site and any material appreciation of its openness. At **Viewpoint 17**, opposite the entrance to Lea Farm, a break in the hedgerow at a field access point allows fleeting views across the site towards the H.L Smith depot, north of the site on Cross Road. With the proposed development in place, an appreciation of the openness of the Site would be restricted over time by the growth of the infill hedgerow planting and woodland belt set behind, although the planting would be consistent with the character of the wider landscape. Further west, the roadside hedgerow largely prevents views across the Site and this limited appreciation of openness would be retained in the vicinity of the new roundabout junction; however hedgerow removal would initially open up views into the Site including the new built development. Over time, localised views of the built development behind the new roundabout junction would be restricted by growth of mitigation planting, that would in effect partly re-establish the baseline experience of a limited sense of openness associated with the Site.
- 5.27. South of the A464, the land gently falls away and opportunities for appreciation of the current openness of the Site are very limited, because this area is devoid of public rights of way and the rural lanes are typically flanked by continuous mature hedgerows. At **Viewpoint 18**, on Rushey Lane, close to the northwest corner of the Patshull Registered Park and Garden (RPG), there is a narrow view through a field access. Elsewhere within the RPG, mature woodland cover within the RPG prevents any opportunities to appreciate a sense of openness associated with the Site. The addition of the proposed development over 1.5km distant behind existing scattered development along the A464 and intermittent vegetation would have a negligible effect upon the appreciation of openness associated with the Site.

Visual aspect of openness as perceived from the west

- 5.28. Road users of the A464 travelling east from Whitton Cross, would initially not experience any sense of openness associated with the Site because views would be prevented by a local ridgeline. The Albrighton Feeds store and parking area that are situated directly west of the Site are directly visible from the A464 and obliquely seen from the southern end of Green Lane where there is a short break in the roadside hedgerow (**Viewpoint 19**). An appreciation of the sense of openness associated with the Site is limited by planting, both along Cross Road and within the curtilages of properties and the H.L Smith depot. The introduction of the proposed development in this baseline context will have a minor effect on the perception of openness comprising glimpses of new development on the site from localised parts of the A464 and Green Lane west of the Site.
- 5.29. Burnhill Green Lane is located to the southwest of the Site and any sense of openness associated with the Site is typically prevented due to mature roadside hedgerows. A fleeting glimpse of the Site is available for several meters of the route alongside a gap in the hedgerow near a local highpoint (**Viewpoint 20**), however existing tree cover within the intervening landscape limits any real appreciation of the openness of the Site. With the proposed development in place, there would be fleeting and partial glimpses of new built development on the Site, largely restricted by intervening vegetation and following the growth of mitigation planting screened over time. The resulting impact upon the openness of the Site as perceived from Burnhill Lane would be modest and there would be an extremely localised reduction in openness given the limited volume of new built development visible, further restricted over time by the growth of mitigation woodland planting.

Summary of Visual Aspects of Openness as it relates to the Proposed Scheme

- 5.30.** The opportunity to appreciate the visual aspects of openness associated with the Site is limited. From the relatively few locations where parts of the ground level of the Site are clearly visible, and the sense of openness associated with the Site is often restricted by mature roadside hedgerows and tree cover.
- 5.31.** The introduction of the proposed development on the Site would inevitably reduce the sense of openness associated with the Site, however this perception would be highly localised and restricted to the immediate context of the Site.
- 5.32.** The vehicle movements associated with the Site access would be restricted to a short section of the route east of Newhouse Lane, although over time this would be reduced by the growth of woodland planting. Any perception of activity within the Site, including vehicle movements, would from the majority of locations within the wider Green Belt, be predominantly screened by the hedgerows along the site boundary that would be retained and/or reinforced by mitigation planting.
- 5.33.** The sense of visual openness associated within the wider Green Belt landscape would remain materially unchanged with the Site developed and removed from the designation.

Conclusions on Openness in the context of the wider Green Belt

- 5.34.** In overall terms, the removal of the Site from the Green Belt would have a limited effect upon the appreciation of the openness of the remaining Green Belt, due to a combination of local landform, intervening built development and mature vegetation. In close proximity to the Site, the perception of the loss of openness whilst moderate or notable in some cases, would be localised. Mitigation planting, including woodland belts, would over time reduce the proportion of built development perceived, and whilst visual openness would be reduced, the resulting change would be consistent with the character of the wider landscape and reduction in openness would typically affect the Site itself, and not views across the wider Green Belt landscape.

6. Summary and Conclusions

Site contribution to Green Belt Purposes a, b and d.

- 6.1. The Site is assessed to have no contribution to Purposes a, b and d of the Green Belt. Marrons Planning conclude that there are no strong reasons for restricting development (NPPF footnote 7), and consequently it is assessed that the Site is Grey Belt.

Effect of the proposed development on the Purposes of the remaining Green Belt

- 6.2. It is concluded that the proposed development would comply with paragraph 155a of the NPPF, because the structured analysis above demonstrates that the proposals *"would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan."*

Accessible Green Space

- 6.3. The 'Golden Rules' at NPPF (2024) paragraph 156c states that major development should include *"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"*. New accessible open green space would be provided by the proposed development.

Harm to Openness of the Green Belt

- 6.4. The removal of the Site from the Green Belt would have a modest and localised effect on the spatial aspect of Green Belt openness, given that the proposed development would:
- comprise only 0.2% of the Green Belt within Shropshire;
 - be physically well related and connected to the existing adjoining village edge to the north including safeguarded land and potential development land controlled by another developer;
 - comprise a notable extension of Albrighton that takes into account existing densities and building heights and would be in keeping with the historical pattern of substantial outward village growth. The expansion occurred relatively recently during the latter part of the 20th century with extensive development of modern housing estates west and southwest of the historic core;
 - Include notable areas of undeveloped land as public open space, incorporating existing planting and enhancing green infrastructure including public access; and
 - the new Green Belt boundaries would follow existing features on the ground including established road corridors where existing hedgerows and tree planting would be predominantly retained. The site boundaries including the new access road at the southeast corner of the site will be reinforced by new planting, typically comprising woodland belts.

- 6.5.** The visual openness of the Green Belt considers visual links of a Site or area such as a Green Belt parcel, to the wider Green Belt, intervisibility between settlements, and potential impacts on wider ranging views across the Green Belt.
- 6.6.** The Site has very limited public access, restricted to the southeast corner where a public footpath crosses the proposed access road. The mature hedgerow and tree planting along the majority of the site perimeter combined with the relatively flat landform and limited public access limits views of the Site.
- 6.7.** The opportunities to appreciate the visual aspects of openness associated with the Site are limited due to the relatively flat landform of the Site and mature planting to the site perimeter. From the relatively few locations where the Site is visible, the sense of openness associated with the Site is only fleetingly experienced from localised parts of the highway and public rights of way network.
- 6.8.** The introduction of the proposed development on the Site would inevitably reduce the sense of openness associated with the Site, however this perception would be typically highly localised to the immediate context of the Site.
- 6.9.** The vehicle movements associated with the main Site access on the A464 would be restricted to a short section of the route and perceived within the context of existing traffic movement on this main route. Perception of activity within the Site, including vehicle movements, would be largely restricted by the retained perimeter vegetation, reinforced with extensive new planting including woodland belts.
- 6.10.** The sense of visual openness associated with the wider Green Belt landscape would remain materially unchanged with the Site developed and removed from the designation.
- 6.11.** In overall terms, the removal of the Site from the Green Belt would have a negligible effect upon the appreciation of the openness of the remaining Green Belt, due to a combination of local landform, intervening built development and mature vegetation. Even in close proximity to the Site, the perception of the loss of openness whilst moderate and in some cases notable, would be highly localised.



Appendices

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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