SOUTH STAFFORDSHIRE COUNCIL
SOUTH STAFFORDSHIRE LOCAL PLAN

EXAMINATION OF THE SITE ALLOCATIONS DOCUMENT

MATTERS, ISSUES & QUESTIONS FOR EXAMINATION

MATTER 4 – SITE-SPECIFIC MATTERS, INCLUDING PROPOSED SITE ALLOCATIONS

HOUSING, SAFEGUARDED LAND, GREEN BELT, DEVELOPMENT BOUNDARIES

4.8 FEATHERSTONE
Matter 4:

SITE-SPECIFIC MATTERS, INCLUDING PROPOSED SITE ALLOCATIONS [HOUSING, SAFEGUARDED LAND, GREEN BELT, DEVELOPMENT BOUNDARIES, EMPLOYMENT AND GYPSY & TRAVELLER SITES]

Key issue:
Are the proposed site allocations fully justified, suitable and available for the proposed development, sustainable, developable and deliverable within the plan period; where Green Belt boundaries are proposed to be amended to release land for development or Safeguarded Land, have exceptional circumstances been demonstrated; and are the site-specific requirements necessary, effective and justified?

4.6 Featherstone – Settlement Summary

The Site Allocations document is proposing the delivery of a minimum of 60 dwellings and 1.6ha hectares of land to meet the future housing needs of Featherstone. The allocation for 60 dwellings is above that required in Core Strategy Core Policy 6 of 40 dwellings. This reflects provision in Core Policy 6 to increase levels of growth proposed, where housing development contributes to the delivery of local community infrastructure, where there is a proven need for community facilities and where such housing proposals are supported by local communities. The provision of a sports pitch and changing facilities, allotments and a BMX track or skate park are longstanding aspirations of the community and the Parish Council due to the lack of existing provision, and this is reason for increasing the level of housing at Featherstone. The level of housing growth proposed and the community benefits from the scheme are supported by the Parish Council.

Following initial sieving where sites that did not conform to the spatial strategy were discounted, 10 sites were consulted on at the initial Issues and Options stage in March 2014 [SD51c]. 2 further sites were consulted on at the Additional Issues and Options stage in August 2014 [SD60], including an extension to site 170. Of these 11 sites, 1 site is within the Featherstone development boundary and therefore is sequentially the most preferable option, with the remaining 10 sites peripheral edge of settlement locations within the Green Belt. The site in the development boundary (site 167) had previously had two residential applications approved that subsequently lapsed. Efforts to contact the landowner to confirm their intentions for the site were unsuccessful and therefore the Council remains unconvinced that the site is deliverable. On this basis, site 167 has been discounted.

Of the 10 sites in the Green Belt, 1 was a previously developed (PDL) site and therefore (discounting the development boundary site) is sequentially the most preferable option available. This site, along with 3 other site options, was within a parcel of Green Belt categorised by the Green Belt review to make a contribution to Green Belt purposes. The remaining 5 sites were within parcels that were judged to make a considerable contribution to Green Belt purposes.

All potential development options were assessed to arrive at preferred site options and no sites were the subject of such significant physical or policy constraints that they were excluded from potential selection. The site selection process considered the potential impact of sites against the range of other Tier 1 criteria to determine the best performing location, and as a result 4 sites (167,
168, 170, 397) were taken forward to Tier 2. This is because on balance the remaining sites did not perform as well against Tier 1 criteria, with reasons including impact on Green Belt, landscape sensitivity and highways access. The reasons for discounting sites at the Tier 1 stage are set out in [SD07].

Following Tier 2 assessment, 1 site (168) was identified as the preferred allocation for the next stage of consultation. Site 168 made a contribution to the Green Belt and in the ranking of parcels (set out in the Green Belt review [SD74/74a] was ranked most favourably alongside site 170. However, site 168 is sequentially preferable to site 170 due to its status as a PDL site. Considering this, and all other site selection criteria in the round, site 168 scored best overall and therefore was identified to meet the allocation for Featherstone.

As set out above, the Council could not be confident that site 167 was deliverable and therefore, despite being taken forward for Tier 2 assessment, was discounted on this basis. Site 397 was identified to meet the requirement for safeguarded land ahead of site 170, despite site 170 scoring well against the Tier 1 and 2 criteria. This is because site 397 also scored well overall, however its location adjacent to the allocation site (168) allows for better connectivity to the village and comprehensive master planning - including an amenity landscape buffer - encompassing the allocation and eastern extension to ROF Featherstone.
a. **Land at Brinsford Lodge, Featherstone** (168)  
(Housing/Green Belt/Development Boundary)

i. **Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?**

**Council Response**

The site has been assessed and evaluated in accordance with the Council’s published Methodology and the site selection process considered the potential impact against a range of Tier 1 and Tier 2 criteria, which are set out in the Council’s Methodology Paper [SD21]. The site is in a sustainable location, situated adjacent to the boundary of the existing settlement edge of a Local Service Village in accordance with the strategy identified in the adopted Core Strategy Policy CP1. It has been considered against the sequential approach to site selection as identified in the para 6.20 of the Core Strategy. The only non-Green Belt option consulted upon at Issues and Options (site 167) was granted permission in 1997 and 2002 for residential development however we were never implemented. The Council has been unable to confirm deliverability with the site owner of site 167. Of the remaining site options, Site 168 was sequentially preferable to all others site options and was the best performing site overall against the site selection criteria and therefore was proposed for allocation.

**Local Road Network**

Staffordshire County Council has been engaged throughout preparation of the SAD. They have confirmed that a suitable access can be achieved to the site off Malayan Way although the speed limit may need to be reduced and a new footpath provided. Throughout plan preparation, Staffordshire County Council has raised no concerns regarding the level of development proposed in Featherstone and its impact on the Local Road Network.

**Environment and Landscape**

The site known as Brinsford Lodge is brownfield/Previously Developed Land (PDL) with significant visible hardstanding still on site. The site is a former education facility, and therefore would not see the loss of best and most versatile agricultural land.

Part of the site adjacent to the development boundary is classified as medium landscape sensitivity [SD77].

**Historic Environment and Heritage Assets**

Historic site assessment has been informed by the South Staffordshire Historic Environment Character Assessment [SD096] and confirmed by the South Staffordshire Historic Environment Site Assessment [SD97]. The HECA identifies the site as an early irregular enclosure. Site 168 does not lie within a Conservation Area, nor does it contain a listed building, however a historic environment record (HER) does exist on the site, reflecting the location of a factory building associated with the former ROF Featherstone munitions factory.
Residential Amenity and Wildlife
Site 168 is bounded by Malayan Way and residential properties to the east with fields to the north, south and west. Beyond the fields to the west sits the ROF Featherstone employment site which still contains a number of buildings associated with its former use.

The proforma for the site requires that the layout, orientation and design of the site demonstrate that optimum noise mitigation has been achieved. This is to ensure that amenity issues arising from the extension to ROF Featherstone are appropriately mitigated. This is also reflected in the site requirement to maintain a landscape buffer and noise mitigation to the west, between the site and the extended employment site. A ROF Featherstone Masterplan has been prepared and included in the SAD Appendix 3 which is a result of ongoing dialogue with both ROF Featherstone and site 168 site promoters, to set out how amenity standards can be achieved.
There are no known records of protected species sightings or sensitive environmental designations on site.

Adequacy of Infrastructure and Services
In terms of accessibility services, site 168 is in walking distance to the village community centre, Whitgreave Primary School and local shopping facilities including a convenience store. A bus stop is located relatively close to the site with services to Wolverhampton and Cannock. A new pedestrian link is proposed from the site to the existing pavement network.

Flood Risk
A Flood Risk Assessment (FRA) will be required as part of a planning application once allocated. No significant flood risk concerns have been raised by the Lead Local Flood Authority.

Land Stability and Contamination
Environmental Health Officers have advised that as the site is brownfield, a stage 1 assessment to consider past potentially contaminative use should be undertaken.

Proximity to Mineral Operations
There are no known issues with the site. Staffordshire County Council (the Minerals authority) has been consulted at each stage of the SAD’s preparation and has raised no concerns regarding the site.

Noise and Pollution
The site proforma and the ROF Featherstone Masterplan, requires a strategic landscape buffer to protect residential amenity from the neighbouring ROF Featherstone employment site.

Capacity and Size of Site
Site 168 comprises an area of 2.8ha for allocation in the SAD to meet the village’s allocated land requirement. The 2.8ha hectares of land identified for allocation has sufficient capacity to provide a minimum of 60 dwellings, associated roads and SUDs; plus community benefit including a sports pitch and changing rooms, allotments, and BMX or skate park to be delivered both within and adjacent to the site boundary (for example, the playing pitch is to be delivered to the west of the site boundary, as per the ROF Featherstone Masterplan set out in Appendix 3 of the SAD).
Deliverability and Viability
The Council has engaged with site promoters at all stages of the SAD. The site promoters confirm that the site is deliverable and that a Core Strategy policy compliant scheme can be delivered on site. This includes a minimum 60 dwellings in order to deliver a playing pitch, changing facilities and other community benefit; 30% affordable housing [Policy H2]; an appropriate level of open space/green infrastructure [SAD7] including a contribution towards the landscape buffer between the residential development and ROF Featherstone and other key development requirements set out in policy SAD9.

Consultation with site promoters, residents, statutory bodies and other stakeholders has identified no issues that would impact the viability and deliverability of Site 168. Overall, the vast majority of sites within the District are shown to be deliverable based on the viability study [SD89]. This evidence, combined with the Council’s track record of delivering affordable housing, as set out in Table 10.3 of the Council’s Viability Study [SD89], means the Council can be confident that sites in the plan are deliverable in accordance with the Core Strategy and will be forthcoming, which has been confirmed by the site owners.

ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?

Council Response
The site assessment process identified a number of issues in relation to this selected option which have informed the site development requirements as identified in the individual site proformas. It is expected that these issues will be addressed in order to ensure the successful delivery of this site. The areas which were identified as requiring particular attention were:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site 168 - Allocation</strong></td>
<td></td>
</tr>
<tr>
<td>To be delivered in accordance with ROF Masterplan</td>
<td>To ensure that the residential proposals at Featherstone and the employment proposals at ROF Featherstone are not conflicting, having regard to potential environmental health and amenity issues and the need for a 10ha landscape buffer as required by the Core Strategy.</td>
</tr>
<tr>
<td>Maintain landscape buffer and noise mitigation to the west</td>
<td>To ensure that the residential proposals at Featherstone and the employment proposals at ROF Featherstone are not conflicting, having regard to potential environmental health and amenity issues and the need for a 10ha landscape buffer as required by the Core Strategy.</td>
</tr>
<tr>
<td>Vehicular access off Malayan Way and through into site 397</td>
<td>To provide safe access as agreed in principle with County Highways.</td>
</tr>
<tr>
<td>Pedestrian access to connect to existing pavement network</td>
<td>To ensure safe, effective pedestrian links to facilities and services</td>
</tr>
<tr>
<td>Matter 4 – Site Specific Matters – Housing, Safeguarded Land, Green Belt &amp; Development Boundaries – FEATHERSTONE</td>
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<td><strong>Site Specific Matters</strong></td>
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<tr>
<td><strong>Matter 4 – Site Specific Matters – Housing, Safeguarded Land, Green Belt &amp; Development Boundaries – FEATHERSTONE</strong></td>
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<tr>
<td><strong>Strong landscape boundaries to be implemented to contain small site in a larger parcel</strong></td>
<td>To ensure existing hedgerows and field patterns are retained where possible to provide robust boundaries.</td>
</tr>
<tr>
<td><strong>Connectivity to existing open space including contribution of remaining site to ROF strategic landscape buffer, SUDs and new open space to be delivered</strong></td>
<td>SUDs to provide adequate sustainable drainage to the site and to mitigate any surface water flooding on site. Off site open space to form a landscape buffer to protect residential amenity from the employment site to the west.</td>
</tr>
<tr>
<td><strong>Allotments, BMX track or skate park, sports pitch and changing rooms to be delivered on site</strong></td>
<td>These are longstanding community infrastructure aspirations for the Parish Council, and the reason for Featherstone’s allocation exceeding the housing requirement for the village, in accordance with Core Strategy Core Policy 6 [CD70].</td>
</tr>
<tr>
<td><strong>Layout, orientation and design of site to demonstrate that optimum noise mitigation has been achieved</strong></td>
<td>To ensure that the residential proposals at Featherstone and the employment proposals at ROF Featherstone are not conflicting, having regard to potential environmental health and amenity issues and the need for a 10ha landscape buffer as required by the Core Strategy.</td>
</tr>
<tr>
<td><strong>Travel Plan/public transport contributions</strong></td>
<td>Identified as a mitigation measure in Table 3.2 of the SA [SD10].</td>
</tr>
<tr>
<td><strong>Masterplanning to take account of HER onsite</strong></td>
<td>Identified as a mitigation measure in Table 3.2 of the SA [SD10].</td>
</tr>
<tr>
<td><strong>Satisfactorily address the potential for contaminated land on site</strong></td>
<td>Required in order to address any contamination issues associated with brownfield land and the sites former use. Reflects advice provided by Environmental Health officers.</td>
</tr>
<tr>
<td><strong>Include a display board highlighting the site’s historic use as part of the Royal Ordnance Factory within the proposed open space</strong></td>
<td>Recommendation in the HESA [SD97].</td>
</tr>
</tbody>
</table>

The Council considers that the requirements for Site 168 are necessary to make the development acceptable and to mitigate impacts of development.

**iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?**

**Council Response**
The SAD has been positively prepared, predicated on the principle of plan led growth to deliver the requirements for allocated sites and safeguarded land set out in the adopted Core Strategy. A comprehensive and transparent districtwide assessment of all available and deliverable sites has been carried out [SD079], as set out in the Council’s response to 2.2(d). Therefore, the Green Belt releases proposed in Policies SAD2/SAD3 are consistent with the NPPF and PPG, as they are based on a clear case for exceptional circumstances and have been informed by a Green Belt Review [SD74 – 74a], to ensure that harm to the purposes of the Green Belt is minimised. Furthermore, the Core Strategy is clear at paragraph 6.21 that, ‘In order to deliver the Core Strategy, it is recognised that in a number of Main Service Villages and Local Service Villages it will be necessary to immediately consider land that is currently Greenfield and Green Belt because the opportunities to explore the first three stages in the sequential approach do not exist’.

Site 168 is a PDL site in the Green Belt within a parcel of land categorised as making a contribution to the purposes of the Green Belt. [SD74]. All available, suitable and deliverable site options in Featherstone were considered with the allocation site being sequentially preferable and having the joint lowest impact on the Green Belt of the site options available.

Therefore, the exceptional circumstances justifying the site’s release and the realignment of the development boundary include: the requirements of paragraph 6.20 of the adopted Core Strategy including the sequential approach to site selection that favours PDL sites in the Green Belt over greenfield Green Belt sites; the dwelling requirement for Featherstone; the outcomes of the Green Belt Review; the Council’s attempts to fully explore non-Green Belt land supply options within the village; the provision of community infrastructure benefit; and the site’s role in providing a strategic landscape buffer between residential development and ROF Featherstone.
b. **Land adjacent to Brinsford Lodge, Featherstone (397)**  
(Safeguarded Land/Green Belt/Development Boundary)

i. Are the reasons for selecting the site soundly based; has the site assessment process identified and addressed all relevant considerations, including, where applicable, impact on the local road network, environment, landscape, historic environment, heritage assets, residential amenity and wildlife, adequacy of infrastructure/services, flood risk, land stability/contamination, proximity to mineral operations, noise and pollution and capacity/size of the site; and is the site suitable, available, justified, sustainable, developable, deliverable, viable and soundly based?

**Council Response**

The site (397) has been assessed and evaluated in accordance with the Council’s published Methodology and the site selection process considered the potential impact against a range of Tier 1 and Tier 2 criteria, which are set out in the Council’s Methodology Paper [SD21]. The site is in a sustainable location situated adjacent to the boundary of the existing settlement edge of a Local Service Village in accordance with the strategy identified in the adopted Core Strategy Policy CP1. Sites have been considered against the sequential approach to site selection as identified in the para 6.20 of the Core Strategy. Following assessment against the Tier 1 and 2 criteria, site 168 was considered the most suitable site for development followed by site 170 and 397. However on balance, site 397 was considered the most suitable site to meet the village’s safeguarded land requirement. This is because site 397 scored well against the Tier 1 criteria, and in particular its location adjacent the allocation site allows for better connectivity to the village and comprehensive masterplanning of both sites collectively - including an amenity landscape buffer - encompassing the allocation and eastern extension to ROF Featherstone. How the site scored against the site selection criteria in comparison to other is set out in the Site Assessment and Discounted Sites Topic Paper [SD07].

**Local Road Network**

Staffordshire County Council has been engaged throughout preparation of the SAD. They have confirmed that a suitable access can be achieved to the site off Malayan Way [SD08], to be agreed through a planning application if allocated through a review of the Local Plan. Throughout plan preparation, Staffordshire County Council has raised no concerns regarding the level of development proposed in Featherstone and its impact on the Local Road Network.

**Environment and Landscape**

The site is identified as comprising Grade 3 quality agricultural land. Whilst attention is given towards protecting wherever possible the higher grades of agricultural land from development it was recognised in the Council’s SHLAA [SD79] that the presence of such high quality agricultural land is so extensive in certain parts of the district as to severely limit the potential for development. It was therefore determined to seek to protect Grade 1 quality land and direct developers to minimise the loss of the other better quality grades when drafting detailed scheme proposals [Policy SAD9].

The whole of the site adjacent to the development boundary is classified as medium landscape sensitivity [SD77].
Historic Environment and Heritage Assets
Historic site assessment has been informed by the South Staffordshire Historic Environment Character Assessment [SD096] and confirmed by the South Staffordshire Historic Environment Site Assessment [SD97]. The HECA identifies the site as an early irregular enclosure. A HER record exists on the site associated with its former use as a munitions factory and this has been considered in the HESA when identifying mitigation and enhancement opportunities. Site 397 does not lie within a Conservation Area, nor does it contain a listed building.

Residential Amenity and Wildlife
Site 397 is bounded by Malayan Way and residential properties to the east, the allocation site to the north and fields to the south and west. There is a brook running to the south of the site to act as a robust boundary. Beyond the fields to the west sits the ROF Featherstone employment site which still contains a number of buildings associated with its former use.

The proforma for the site requires that the layout, orientation and design of the site ensures linkages with the allocation site (168) and demonstrate that optimum noise mitigation has been achieved in accordance with the ROF Featherstone Masterplan. This is to ensure that amenity issues arising from the extension to ROF Featherstone are appropriately mitigated. This is also reflected in the site requirement to maintain a landscape buffer and noise mitigation to the west, between the site and the extended employment site.

There are no known records of protected species sightings or sensitive environmental designations on site.

Adequacy of Infrastructure and Services
In terms of accessibility services, Site 397 is in walking distance to the village community centre, Whitgreave Primary School and local shopping facilities including a convenience store. A bus stop is located relatively close to the site with services to Wolverhampton and Cannock. A new pedestrian link is proposed from the site to the existing pavement network.

Flood Risk
The site has been reduced in size since Preferred Options, in part to avoid floodplain 2/3 and the brook to be used as the southern boundary of the site. After discussion with the Environment Agency, a Flood Risk Assessment (FRA), including modelling of the extent of the brook, will be required as part of any planning application.

Land Stability and Contamination
Environmental Health Officers have advised that a stage 1 assessment to consider past potentially contaminative use should be undertaken.

Proximity to Mineral Operations
There are no known issues with the site. Staffordshire County Council (the Minerals authority) has been consulted at each stage of the SAD’s preparation and has raised no concerns regarding the site.

Noise and Pollution
The site proforma requires a strategic landscape buffer to protect residential amenity from the neighbouring ROF Featherstone employment site.
Capacity and Size of Site
Site 397 comprises an area of 1.6ha. This along with other safeguarded sites proposed through the SAD are sufficient to meet the Council’s safeguarded land requirement set out in Core Strategy Policy GB2 [SD70]. This is discussed in detail in response to question 2.3 (a-c).

Deliverability and Viability
Overall, the vast majority of sites within the Plan are shown to be deliverable based on the viability study [SD89]. This evidence, combined with the Council’s track record of delivering affordable housing, as set out in Table 10.3 of the Council’s Viability Study [SD89], means the Council considers that there is more than a reasonable prospect that the safeguarded site could be viably delivered at the point envisaged.

ii. Are the site-specific planning requirements necessary, effective and justified, including, where applicable, pedestrian and vehicular access, landscape, open space, boundary treatment, flood risk, drainage, transport assessment and road/junction improvements, boundary treatment and contributions to education/road improvements?

Council Response

The site assessment process identified a number of issues in relation to this selected option which have informed the site development requirements as identified in the individual site proformas. It is expected that these issues will be addressed in order to ensure the successful delivery of this site (albeit through a Local Plan Review). The areas which were identified as requiring particular attention were:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Reason</th>
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<tbody>
<tr>
<td><strong>Site 397 – Safeguarded Land</strong></td>
<td></td>
</tr>
<tr>
<td>To be delivered in accordance with ROF Masterplan</td>
<td>To ensure that the residential proposals at Featherstone and the employment proposals at ROF Featherstone are not conflicting, having regard to potential environmental health and amenity issues and the need for a 10ha landscape buffer as required by the Core Strategy.</td>
</tr>
<tr>
<td>Maintain landscape buffer and noise mitigation to the west</td>
<td>To ensure that the residential proposals at Featherstone and the employment proposals at ROF Featherstone are not conflicting, having regard to potential environmental health and amenity issues and the need for a 10ha landscape buffer as required by the Core Strategy.</td>
</tr>
<tr>
<td>Will assist allocated site 168 to connect to the village</td>
<td>In line with good design principles ensuring good vehicular and pedestrian connectivity to the village</td>
</tr>
<tr>
<td>Vehicular access off east Road/Brookhouse Lane and links into, and through site 168</td>
<td>To provide safe access as agreed in principle with County Highways. To ensure good vehicular and pedestrian connectivity to the village.</td>
</tr>
</tbody>
</table>
Pedestrian access to connect to existing pavement network | To ensure safe, effective pedestrian links to facilities and services.

Strong landscape boundaries to be implemented to contain small site in a larger parcel | To ensure existing hedgerows and field patterns are retained where possible to provide robust boundaries.

Connectivity to existing open space including contribution of remaining site to ROF strategic landscape buffer, SUDs and new open space to be delivered onsite. | SUDs to provide adequate sustainable drainage to the site and to mitigate any surface water flooding on site. Off-site open space to form a landscape buffer to protect residential amenity from the employment site to the west.

Flood Risk Assessment to inform development in the plan review and to include modelling of the extent of the brook to ensure built development takes place outside of Flood Zones 2 and 3. This should be carried out with the involvement of the Lead Local Flood Authority. | To ensure that development is directed towards areas of lower flood risk and that any mitigation measures are identified and implemented.

Layout, orientation and design of site to link to 168 and demonstrate that optimum noise mitigation has been achieved. | To ensure that the residential proposals at Featherstone and the employment proposals at ROF Featherstone are not conflicting, having regard to potential environmental health and amenity issues and the need for a 10ha landscape buffer as required by the Core Strategy.

To ensure clear vehicular and pedestrian links from residential development to the village.

Travel Plan/public transport contributions. | Identified as a mitigation measure in Table 3.2 of the SA [SD10].

The Council considers that the requirements for Site 397 are necessary to make the development acceptable and to mitigate impacts of development.

**iii. Where the site is being released from the Green Belt for development or Safeguarded Land, have the exceptional circumstances for releasing the site from the Green Belt been fully demonstrated, and would the release of the site prejudice or conflict with the purposes of including the site within the Green Belt?**

**Council Response**

The SAD has been positively prepared, predicated on the principle of plan led growth to deliver the requirements for allocated sites and safeguarded land set out in the adopted Core Strategy. A comprehensive and transparent districtwide assessment of all available and deliverable sites has been carried out [SD079], as set out in the Council’s response to 2.2(d). Therefore, the Green Belt releases proposed in Policies SAD2/SAD3 are consistent with the NPPF and PPG, as they
are based on a clear case for exceptional circumstances and have been informed by a Green Belt Review [SD74 – 74a], to ensure that harm to the purposes of the Green Belt is minimised. Furthermore, the Core Strategy is clear at paragraph 6.21 that, 'In order to deliver the Core Strategy, it is recognised that in a number of Main Service Villages and Local Service Villages it will be necessary to immediately consider land that is currently Greenfield and Green Belt because the opportunities to explore the first three stages in the sequential approach do not exist'.

Site 397 lies in the Green Belt within a parcel of land categorised as making a contribution to the purposes of the Green Belt. [SD74]. All available, suitable and deliverable site options in Featherstone were considered; with site 168 considered to have equal least impact on the Green Belt but was sequentially the most favourable option available as it is PDL. Site 397 was also categorised as making a contribution to the Green Belt and was considered on balance to be the next most favourable site and was therefore identified for safeguarded land. This was based upon how the site scored against the site selection criteria, as well as the opportunities it presented to connect to the allocation site and its role in a comprehensive masterplan for land to the west of Featherstone/east of ROF Featherstone.

Therefore, the exceptional circumstances justifying the site’s release and the realignment of the development boundary include the requirements of paragraph 6.20 of the adopted Core Strategy; the need to identify sufficient safeguarded land to deliver 1750 dwellings in accordance with Core Strategy Policy CP6 and the outcomes of the Green Belt Review; the Council’s attempts to fully explore non-Green Belt land supply options within the village; and the site’s role in providing a strategic landscape buffer between residential development and ROF Featherstone.