



www.landuse.co.uk

South Staffordshire Green Belt Study

Stage 1 and 2 Report
Prepared by LUC
July 2019

Project Title: Green Belt Study – Stage 1 and Stage 2 Report

Client: South Staffordshire Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	18/03/2019	Draft Stage 1 and 2 Report	Richard Swann Helen Kent Natalie Collins	Helen Kent	Sarah Young
2.0	10/05/2019	Draft Stage 1 and 2 Report	Richard Swann Helen Kent Natalie Collins	Helen Kent	Sarah Young
3.0	23/07/2019	Stage 1 and 2 Report	Richard Swann Helen Kent Natalie Collins	Helen Kent	Sarah Young



www.landuse.co.uk

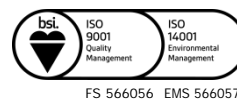
South Staffordshire Green Belt Study

Stage 1 and 2 Report
Prepared by LUC
July 2019

Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
GIS & Visualisation

LUC LONDON
250 Waterloo Road
London
SE1 8RD
T +44 (0)20 7383 5784
london@landuse.co.uk

Offices also in:
Bristol
Edinburgh
Glasgow
Lancaster
Manchester



Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD
LUC uses 100% recycled paper

Contents

Part A: Introduction, Policy Context and Definition of Terms	4
1 Introduction	5
Study aims and objectives	5
Duty to Co-operate Engagement	6
Report Structure	7
2 Policy Context	9
Introduction	9
National Green Belt Policy	9
National Planning Policy	9
Other Relevant Guidance and Case Law	11
Origins of the West Midlands Green Belt	15
South Staffordshire's Green Belt	15
South Staffordshire Development Plan	16
Safeguarded Land	17
Neighbouring Authority Green Belt Reviews	17
3 Definition of Terms	20
Introduction	20
Factors affecting contribution to Green Belt purposes	20
Openness	20
Permanence	21
Purpose 1: To check the unrestricted sprawl of large built-up areas	21
Purpose 2: To prevent neighbouring towns from merging into one another	24
Purpose 3: To assist in safeguarding the countryside from encroachment	27
Purpose 4: To preserve the setting and special character of historic towns	27
Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land	29
Part B: Stage 1 Methodology and Findings	32
4 Stage 1 Methodology	33
Introduction	33
Strategic Assessment Process	33
Criteria for Assessment of Green Belt Contribution	34
Stage 1 Strategic Assessment Outputs	39
5 Stage 1 Findings	40
Introduction	40
Key Findings	40
Assessment of Contribution to Green Belt Purpose 1	42
Assessment of Contribution to Green Belt Purpose 2	46
Assessment of Contribution to Green Belt Purpose 3	49
Assessment of Contribution to Green Belt Purpose 4	52
Part C: Stage 2 Methodology and Findings	58
6 Stage 2 Methodology	59
Introduction	59
Identification of assessment areas for Stage 2 assessment	59
Links between Stage 1 and Stage 2 assessment	60

	Stage 2 Assessment Process	60
	Criteria for Assessment of Harm resulting from Green Belt Release	61
	Stage 2 Assessment Outputs	63
7	Stage 2 Findings	65
	Introduction	65
	Summary of findings	65
	Assessment of harm for Promoted Sites	70
	Role of Green Belt Harm Assessment	76
	Part D: Making Changes to the Green Belt	84
8	Making Changes to the Green Belt	85
	Introduction	85
	Making Changes to the Green Belt	85
	Mitigation to Reduce Harm to Green Belt	86
	Beneficial Use of Green Belt	89
	Conclusion	90
	Appendix 1	91
	Duty to Cooperate Consultation - Comments on Methodology	91
	Appendix 2	95
	Stage 1 Contribution Assessments	95
	Appendix 3	260
	Stage 2 Harm Assessments	260

List of Abbreviations

NPPF	National Planning Policy Framework
SAC	Special Area of Conservation
SBI	Site of Biological Importance (within South Staffordshire, equivalent of SINC in the Black Country)
SINC	Site of Importance to Nature Conservation (within the Black Country, equivalent of SBI in South Staffordshire)
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

Part A: Introduction, Policy Context and Definition of Terms



1 Introduction

- 1.1 In 2018 LUC was commissioned to undertake an assessment of the Green Belt for the City of Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country) and South Staffordshire. The Study forms an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities and South Staffordshire. This report sets out the findings of the Stage 1 and Stage 2 Green Belt Assessment for South Staffordshire. A separate report sets out the Stage 1 and 2 findings for the Black Country.
- 1.2 LUC is one of the leading Environmental Consultants in the UK specialising in Environmental Planning, Design and Management. LUC's involvement in Green Belt policy development and review is unparalleled. We have advised developers and local authorities across the country on Green Belt issues, as well as undertaking numerous independent Green Belt studies at a range of scales. We have completed Green Belt Assessments or Reviews on behalf of nearly 40 Local Authorities throughout England.

Study aims and objectives

- 1.3 The overall aim of the Study was to undertake an independent, robust and transparent assessment of Green Belt within the South Staffordshire. This includes a comprehensive assessment of the performance of Green Belt land in line with policy set out in the National Planning Policy Framework (NPPF) good practice guidance, local plan examination inspectors' reports and case law. The Study draws out variations in the contribution of land to the five Green Belt purposes, identifying areas of land whose performance ranges from relatively weak to relatively strong in Green Belt terms. The Green Belt within the South Staffordshire is illustrated in **Figure 1.1**.
- 1.4 The Green Belt Study has two stages.
- 1.5 **Stage 1** draws out strategic variations in the 'contribution' of Green Belt land to the Green Belt purposes as defined in the National Planning Policy Framework (NPPF). This has regard to the wider context of Green Belt land within the South Staffordshire, and neighbouring authorities. At the end of Stage 1, strategic parcels of Green Belt land were defined which draw-out variations in the contribution of Green Belt land in relation to the five Green Belt purposes, as set out in Para 134 of the NPPF:
- 1 to check the unrestricted sprawl of large built-up areas;
 - 2 to prevent neighbouring towns merging into one another;
 - 3 to assist in safeguarding the countryside from encroachment;
 - 4 to preserve the setting and special character of historic towns; and
 - 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.6 **Stage 2** includes a more focused assessment of the potential 'harm' of removing land from the Green Belt. The assessment area covers all unconstrained Green Belt land within South Staffordshire.

- 1.7 Stage 1 considers variations in the **contribution** made by land to Green Belt purposes, whereas Stage 2 assesses the **harm** to the Green Belt that would result from the release of specific sites or parcels of land. In assessing harm, in addition to the contribution to Green Belt purposes, consideration is given to how loss of land from the Green Belt would affect the strength/integrity of the remaining Green Belt and the residual Green Belt boundaries. This approach is consistent with the latest case law on the matter, notably *Calverton Parish Council v Greater Nottingham Councils & others* (2015)¹, which found that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt.
- 1.8 The factors which influence the assessment of harm are the same as those which determine variations in contribution, but considering a specific area of land allows a more detailed analysis of where the role of site/parcel location, size and boundaries and how these are weighed up alongside the strategic contribution findings (relating to each Green Belt purpose) in order to arrive at a single overall harm rating. The assessment process also allows 'sub site or sub area scenarios' to be identified where smaller areas of land (i.e. part of a site or parcel) could potentially be released with less resultant harm to Green Belt purposes. This information on Green Belt harm, can be weighed up by the Council alongside sustainability and viability considerations to make decisions on the potential suitability of releasing Green Belt land.
- 1.9 Alongside the Green Belt Study, **Stage 3** involved undertaking a landscape sensitivity assessment, assessing the sensitivity of land within the South Staffordshire to housing and employment development. There is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character and sensitivity are also likely to play a role in the spatial relationship between urban areas and the countryside. However there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land. The findings of the Stage 3 landscape sensitivity assessment for South Staffordshire and the Black Country are presented in two separate accompanying reports.

Duty to Co-operate Engagement

- 1.10 A method statement setting out the proposed assessment approach for the South Staffordshire Green Belt Study was circulated to the Council's key stakeholders with whom the Council has a duty to cooperate,² as well as other organisations the Council considered necessary. This included the following:
- Birmingham City Council.
 - Bromsgrove District Council.
 - Cannock Chase District Council.
 - City of Wolverhampton Council.
 - Coventry City Council.
 - Dudley Borough Council.
 - Environment Agency.
 - Historic England.
 - Lichfield District Council.
 - Natural England.

¹ See para. 2.24 for more details.

² Section 110 of the Localism Act (2011).

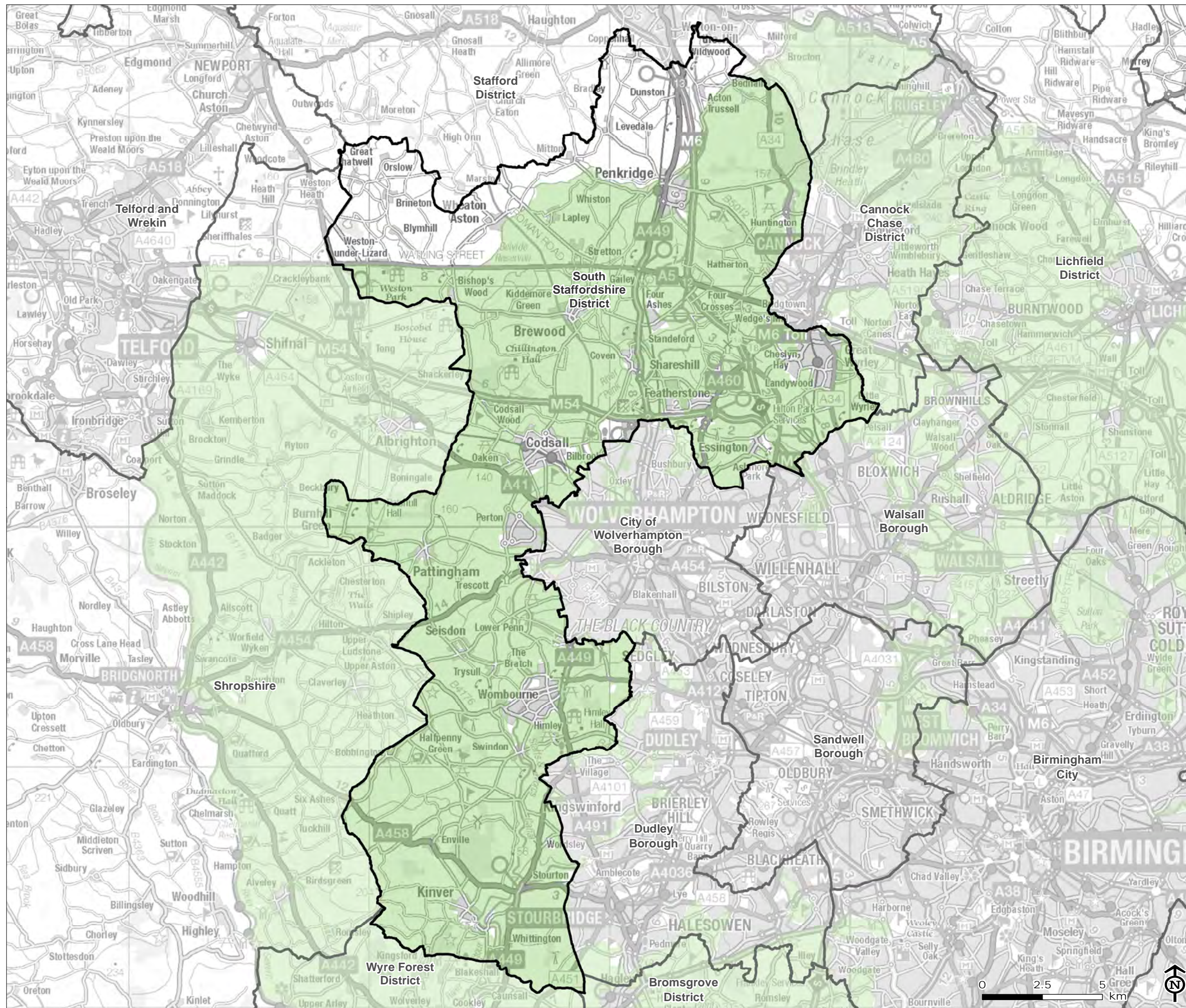
- North Warwickshire Borough Council.
- Redditch Borough Council.
- Sandwell Council.
- Shropshire Council.
- Stafford Borough Council.
- Staffordshire County Council.
- Stratford-on-Avon District Council.
- Tamworth Borough Council.
- Telford & Wrekin Council.
- Walsall Borough Council.
- Wildlife Trust.
- Wyre Forest District Council.

- 1.11 Stakeholders were invited to comment on the draft methodology and a summary of their responses and how their comments have been addressed is provided in **Appendix 1**.

Report Structure

- 1.12 This report is divided into four parts:

Part A: Introduction and context	
Chapter 1	Sets out the aims and objectives of the study and the consultation that has informed its preparation.
Chapter 2	Summarises the relevant national and local policy context and the origins of the West Midlands Green Belt.
Chapter 3	Sets out the definitions which inform the Green Belt Assessment methodology for Stages 1 and 2 of the Study.
Part B: Stage 1 Assessment of Contribution	
Chapter 4	Outlines the assessment methodology for Stage 1 of the Study: the assessment of contribution to the Green Belt purposes.
Chapter 5	Summarises the findings of the Stage 1 assessment. The detailed assessment findings are contained in Appendix 2 .
Part C: Stage 2 Assessment of Harm	
Chapter 6	Outlines the assessment methodology for Stage 2 of the Study: the assessment of harm of the release of land from the Green Belt.
Chapter 7	Summarises the findings of the Stage 2 assessment. The detailed assessment findings are contained in Appendix 3 .
Part D: Making Changes to the Green Belt	
Chapter 8	Summarises the next steps and discusses mitigation measures which may be used should land be released from the Green Belt, along with the potential beneficial uses of Green Belt land.



2 Policy Context

Introduction

- 2.1 This chapter provides a summary of National Green Belt policy, relevant guidance and case law and the local Green Belt and planning policy context.

National Green Belt Policy

- 2.2 In 1955 the Government established (through Circular 42/55) the three main functions of the Green Belt as:
- Checking growth of large built-up areas.
 - Preventing neighbouring settlements from merging.
 - Preserving the special character of towns.
- 2.3 Emphasis upon the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries only to be altered in exceptional circumstances was established through Circular 14/84.
- 2.4 In January 1988 PPG2 Green Belts (Planning Policy Guidance Note 2), subsequently replaced in 1995 and further amended in 2001, explicitly extended the original purposes of the Green Belt to add:
- to safeguard the surrounding countryside from further encroachment; and,
 - to assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).
- 2.5 PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012³, revised and re-published in July 2018⁴ and in February 2019⁵, and this document currently provides national Green Belt policy. The current position of the Government in relation to Green Belt provided through the NPPF is set out below.

National Planning Policy

- 2.6 Government policy on Green Belt is set out in Chapter 13 of the National Planning Policy Framework (NPPF)⁶. Paragraph 133 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”*.
- 2.7 This is elaborated in NPPF paragraph 134, which states that Green Belts should serve five purposes, as set out overleaf.

³ Department of Communities and Local Government (2012) National Planning Policy Framework Available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁴ Department of Communities and Local Government (2018) National Planning Policy Framework Available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁵ Department of Communities and Local Government (2019) National Planning Policy Framework. Available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁶ Department of Communities and Local Government (2019) National Planning Policy Framework. Available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

The NPPF purposes of Green Belt

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.8 The NPPF emphasises in paragraph 135 and 136 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state 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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”*
- 2.9 Paragraph 137 of the NPPF requires that the *“strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development”* before concluding that the exceptional circumstances exist (paragraph 137), specifically whether the strategy:
- a. *“makes as much use as possible of suitable brownfield sites and underutilised land;*
 - b. *optimises the density of development, 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.”*
- 2.10 Paragraph 138 of the NPPF indicates that *“when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”*.⁷
- 2.11 Paragraph 139 of the NPPF suggests that Local Planning Authorities may wish to identify areas of ‘safeguarded land’ between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period.
- 2.12 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states *“local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”* (Paragraph 141).

⁷ This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- 2.13 It is important to note, however, that these positive roles should be sought for Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Openness is not synonymous with landscape character or quality.
- 2.14 Paragraph 143 and 144 state 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, is clearly outweighed by other considerations."*
- 2.15 Paragraphs 145 sets out the types of new buildings that are not inappropriate in the Green Belt:
- a. *"buildings for agriculture and forestry;*
 - b. *appropriate facilities 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; and*
 - g. *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - *not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*
 - *Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."*
- 2.16 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:
- a. *"mineral extraction;*
 - b. *engineering operations;*
 - c. *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - d. *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - e. *material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and*
 - f. *development brought forward under a Community Right to Build Order."*
- 2.17 Neither the NPPF or the National Planning Practice Guidance (NPPG) provide any specific advice regarding a methodology for undertaking Green Belt reviews, and no reference is made to different scales of review.

Other Relevant Guidance and Case Law

Planning Advisory Service Guidance

- 2.18 Whilst neither the NPPF or NPPG provide guidance on how to undertake Green Belt reviews, the Planning Advisory Service (PAS) has published an advice note that discusses some of the key issues associated with assessing Green Belt.

- 2.19 The PAS Guidance⁸ considers the way in which the five purposes of Green Belt should be addressed, as follows:
- **Purpose 1:** To Check the Unrestricted Sprawl of large built-up areas – this should consider the meaning of the term ‘sprawl’ and how this has changed from the 1930s when Green Belt was conceived.
 - **Purpose 2:** To Prevent Neighbouring Towns from merging into one another – assessment of this purpose will be different in each case and a ‘scale rule’ approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged.
 - **Purpose 3:** To assist in safeguarding the countryside from encroachment – the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
 - **Purpose 4:** Preserving the Setting and Special Character of Historic Towns – this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside.
 - **Purpose 5:** To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.
- 2.20 It also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.
- 2.21 The guidance goes on to list the types of areas of land that might make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes:
- land partially enclosed by development, i.e. where new development would effectively be ‘infill’ development;
 - land where development would be well contained by the landscape;
 - land where harm to the qualities that contributed to the distinct identity of separate settlements would be limited; and,
 - a strong boundary could be created with a clear distinction between ‘town’ and ‘country’.
- 2.22 The Planning Advisory Service has since updated their ‘Plan Making Question and Answer’ advice with regard to the assessment of Green Belt within Local Plans⁹. The service advises that Green Belt Reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology.
- Planning Inspectorate Local Plan Examination Reports*
- 2.23 Since the adoption of the National Planning Policy Framework in March 2012, there have been several important Planning Inspectorate Local Plan Examination Reports which have informed Green Belt planning¹⁰. These include:
- The Inspector’s preliminary conclusions (S Emerson) to Bath and North East Somerset Council (June 2012) highlighted the importance of having an *“up-to-date and comprehensive review of the Green Belt in the district is necessary to see whether all the land so designated fulfils the Green Belt purposes”*.

⁸ Planning Advisory Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

⁹ Planning Advisory Service (2014) PAS Good Plan Making Guide: Principle 2 – Q: When should you carry out a Green Belt Review? Available at: www.local.gov.uk/good-plan-making-guide.

¹⁰ Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

- The Inspector's report (A Thickett) to Leeds City Council (September 2014) emphasised that Green Belt studies should be *"fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations"*, i.e. Green Belt reviews should be 'comprehensive' rather than 'selective'.
- The Inspector's interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted several flaws in the approach to the Council's Green Belt assessment:
 - Contribution to the Green Belt purpose were not the only factors used to inform the assessment, land ownership, availability and deliverability were also considered, weighting overall Green Belt judgements against the purposes of the designation.
 - The Green Belt was divided-up in to assessment parcels inconsistently: large areas were assessed in the same way as small sites and some areas of Green Belt were not assessed.
 - Green Belt purposes 4 and 5 were not assessed.
 - The Council's two stage Green Belt assessment update involving an initial assessment of large general areas followed by smaller parcels for the five Green Belt purposes, was subsequently approved by the Inspector. However, the Inspector emphasised the need for consistency and transparency: *"This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements."*
 - With regard to the assessment of Purpose 4 the Inspector commented that *"the assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant"*.
 - With regard to the assessment of Purpose 5 which focussed on the area of brownfield land within the settlement nearest to the Green Belt land under assessment, the Inspector found the approach to be *"consistent, transparent and proportionate."*
- The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation.
- The Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear *"how the assessment of 'importance to Green Belt' has been derived"* from assessments against the individual purposes of Green Belt and highlighted the importance of revisions to Green Belt boundaries to *"take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process."*
- The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) found that the Phase 1 Green Belt assessment was too strategic to draw out finer grained variations in Green Belt performance and Phase 2 of the review, although more detailed, failed to assess all potential development sites and did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels. The Inspector noted the Green Belt review had incorrectly incorporated an examination of landscape character into the consideration of openness, which *"should only be concerned about the absence of built development and other dominant urban influences"*.
- The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) supported the Council's decision not assess the Borough's Green Belt against Purpose 4 on the grounds that there are no historic towns in the Borough. The Inspector also noted that contribution to Purpose 5 had not been assessed because all brownfield sites with reasonable prospects of development had been identified. The Inspector concluded that this reasoning was *"flawed as a matter of principle because the aims of the Green Belt are long-term but as*

this purpose applies to most land it does not form a particularly useful means of evaluating sites".

High Court and Court of Appeal Judgements

2.24 Since the adoption of the National Planning Policy Framework in March 2012, there have been several important High Court and Court of Appeal judgements that have informed general interpretation of national Green Belt policy¹¹. These include:

- *Heath & Hampstead Society v Camden LBC & Vlachos (2008)* concerned a proposal to demolish an existing residential building on Metropolitan Open Land and replace it with a new, larger building which represented a spatial intrusion upon the openness of the MOL but which did not intrude visually on that openness. The Inspector concluded that *"while it may not be possible to demonstrate harm by reason of visual intrusion as a result of an individual – possibly very modest – proposal, the cumulative effect of a number of such proposals, each very modest in itself, could be very damaging to the essential quality of openness of the Green Belt and Metropolitan Open Land"*. Although the case related to previous policy in relation to the Green Belt as set out in Planning Policy Guidance 2 (PPG 2), this portion of the judgement was cited in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (see below) as relevant guidance in relation to the concept of openness of the Green Belt in the NPPF.
- *Calverton Parish Council v Greater Nottingham Councils & others (2015)* indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent':

"the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent."
- *Timmins and Lymn Family Funeral Service v Gedling Borough Council and Westerleigh Group Limited (2015)* clarifies that any material change of use of land in the Green Belt generally (and the use of land as a cemetery in particular) should be regarded as inappropriate unless listed in paragraphs 89 and 90 of the NPPF.
- *Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)* was a Court of Appeal judgement following a previous high court judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The case was dismissed by the Court of Appeal, but the judgement concluded that:
 - *"openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents."*
 - *"The question of visual impact is implicitly part of the concept of 'openness of the Green Belt' as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and 'safeguarding the countryside from encroachment' includes preservation of that quality of openness. The preservation of 'the setting ... of historic*

¹¹ Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

towns' obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields."

- *"The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there."*
- Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016) found that glasshouse development in the Green Belt is appropriate since it is a 'building for agriculture' under the first bullet of paragraph 89 of the NPPF and therefore not capable of generating harm to the Green Belt designation.
- Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a six hectare quarry extension in the Green Belt. Although paragraph 90 of the NPPF states that mineral extraction is not inappropriate development in the Green Belt, the Council failed to take into account visual impacts when considering whether the proposal would *"preserve the openness of the Green Belt"* as required in paragraph 90 of the NPPF. Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council's own assessment of the likely effects of the development on the landscape, visual impact on openness was *"quite obviously"* relevant to its effect on the openness of the Green Belt. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be *"urban sprawl"* and cannot have an *"urbanising influence"*.

Origins of the West Midlands Green Belt

- 2.25 Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955¹². The Green Belt was not formally approved by the Secretary of State until 1975. Today the Green Belt covers over 900 square miles, surrounding the Black Country, Coventry, Birmingham and Solihull, with its edge lying between 6 and 15 miles from the built up area of the conurbation.
- 2.26 The Green Belt has remained relatively successful in checking the sprawl of Birmingham, the City of Wolverhampton and Coventry, preventing the merging of settlements and encroachment into the surrounding countryside, helping to preserve the setting and special character of the constellation of satellite settlements that inhabit it. At a strategic level, the Green Belt, tightly drawn around settlements, has helped to encourage regeneration by directing development to brownfield sites within the major urban areas. However, some pockets of Green Belt at the urban fringe have been compromised and degraded by infrastructure projects such as roads and power lines, and other urban intrusions¹³.

South Staffordshire's Green Belt¹⁴

- 2.27 In South Staffordshire around 80% of the District is designated as Green Belt, which has broadly prevented the outward spread of the West Midlands conurbation to the north west. The District's larger settlements, such as Codsall and Wombourne, as well as the smaller villages that pre-date the Green Belt, such as Pattingham, Featherstone and Coven, are generally compact and separate, which is a testament to the success of the Green Belt in the District.

¹² Campaign to protect Rural England: West Midlands (June 2007) What Price West Midlands Green Belts? Available at: www.cprewm.org.uk/resources/housing-and-planning/green-belts/item/2220-what-price-west-midlands-green-belts.

¹³ Campaign to protect Rural England: West Midlands (June 2007) What Price West Midlands Green Belts? Available at: www.cprewm.org.uk/resources/housing-and-planning/green-belts/item/2220-what-price-west-midlands-green-belts.

¹⁴ LUC (2014). South Staffordshire Partial Green Belt Review – Method Statement

- 2.28 With 20% of the District's countryside not designated as Green Belt, the District is at risk from development 'leapfrogging' to sites immediately beyond the Green Belt boundary. This can result in unsustainable patterns of housing, public services or employment land. Parts of the settlements of Penkridge and Wheaton Aston lie just outside the northern boundary of the Green Belt, which makes them vulnerable to development pressures.
- 2.29 A Green Belt study was undertaken by LUC to identify the contribution of land around key villages within the District to Green Belt purposes in 2014 to inform the recently adopted Site Allocations Document.
- 2.30 Using the Green Belt statistics published by the Ministry of Housing, Communities & Local Government in 2018¹⁵, **Table 2.1** outlines the total amount of Green Belt within South Staffordshire.

Table 2.1: Green Belt land within South Staffordshire ¹⁶

Green Belt Land within South Staffordshire	Percentage of land covered by Green Belt within South Staffordshire	Percentage of Green Belt Land in England within South Staffordshire ¹⁷
32,320ha	79.3%	1.98%

South Staffordshire Development Plan

- 2.31 The South Staffordshire Development Plan is formed of a number of documents including:
- Core Strategy, adopted 2012.¹⁸
 - Site Allocation Documents, adopted 2018.¹⁹
- 2.32 These documents are supported by a number of Supplementary Planning Documents and Conservation Area Appraisals and Management Plans.
- South Staffordshire Core Strategy*
- 2.33 The Core Strategy outlines a long-term vision for the District, comprising of both a set of objectives and relevant planning policies. South Staffordshire's Green Belt is considered in strategic objective 1: to protect and maintain the Green Belt and Open Countryside.
- Site Allocation Documents*
- 2.34 The Site Allocations Document, adopted in 2018, was produced in conjunction with policies drawn from the Core Strategy. It comprises of a number of most suitable site options for housing, employment open space and recreation. Policy SAD6: Green Belt, Open Countryside and Development Boundary Amendments list twenty nine sites within the West Midlands Green Belt or Open Countryside which will be subject to amendments.

¹⁵ Ministry of Housing, Communities & Local Government (2018) Local authority green belt statistics for England: 2017 to 2018. Available at: www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2017-to-2018

¹⁶ Ministry of Housing, Communities & Local Government (2018) Local authority green belt statistics for England: 2017 to 2018. Available at: www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2017-to-2018

¹⁷ Total are of Green Belt land within England in 2017/2018 according to the Green Belt statistics published by the Ministry of Housing, Communities & Local Government is 1,629,510ha.

¹⁸ South Staffordshire Council (2012) Core Strategy. Available at: www.sstaffs.gov.uk/planning/the-adopted-core-strategy.cfm

¹⁹ South Staffordshire Council (2018) Site Allocations Document. Available at: www.sstaffs.gov.uk/planning/site-allocations.cfm

Safeguarded Land

- 2.35 Safeguarded land is defined as 'land taken out of the Green Belt that is not used for development within the plan period. Safeguarded land is therefore protected from development proposals arising in the meantime by policies with similar force to Green Belt'.²⁰ Over time, this process ensures that Green Belt boundaries remain fixed. Safeguarded land is closely associated with the identification of Green Belt boundaries, and will therefore be considered as part of the assessment of harm within this study.

South Staffordshire

- 2.36 There are a number of areas of safeguarded land in the study area which are identified in the Site Allocations DPD. Their continued suitability will be considered through the South Staffordshire Local Plan Review.
- 2.37 Existing safeguarded land sites (identified through the 1996 Local Plan) are:
- Land at Hobnock Road, Essington (*application approved*).
 - Land at Cherrybrook Drive, Penkridge.
 - Land west of Watery Lane, Codsall (*currently being developed*).
- 2.38 The Site Allocations DPD, adopted in 2018²¹, amended the Green Belt boundary around inset villages to accommodate the following allocated and safeguarded land sites:
- Bilbrook (b and c) – Land off of Pendeford Mill Lane and Lane Green Road.
 - Codsall (c) – Land at Keepers Lane and Wergs Hall Road.
 - Brewood (b) – Land off Four Ashes Road.
 - Coven (b) – Land east of School Lane.
 - Cheslyn Hay (a) – Land off Saredon Road.
 - Cheslyn Hay (b) – Land off Wolverhampton Road.
 - Great Wyrley (b) – Land off Landywood Lane.
 - Featherstone (b) – Land off Brinsford Lodge and land adjacent to Brinsford Lodge.
 - Huntington (a) – Land at Pear Tree Farm.
 - Kinver (b) – Land South of White Hill.
 - Pattingham – Land at Hall End Lane.
 - Perton – Land at Wrottesley Road (south).
 - Swindon – Land off Himley Lane (north).
 - Wombourne (d) – Land off Orton Lane.
 - Wombourne (e) – Land north of Poolhouse Road.

Neighbouring Authority Green Belt Reviews

- 2.39 The following table summarises the Green Belt Studies that have been undertaken in Authorities neighbouring the South Staffordshire Green Belt²². It is noted that, at the time of writing, authorities have Local Plan reviews at various stages and that Cannock Chase District Council is due to consult on various documents including possible further Green Belt Reviews.

²⁰ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

²¹ South Staffordshire Council (2018) Site Allocations Document. Available at: www.sstaffs.gov.uk/planning/site-allocations.cfm.

²² The Black Country Authorities are not referenced in the summary of neighbouring authority Green Belt Studies, as the Black Country Green Belt Assessment is being undertaken in conjunction with the South Staffordshire Assessment using the same methodology. The reports for these assessments are however being prepared separately.

Table 2.2: Summary of Neighbouring Authority Green Belt Studies.

Authority	Summary of Green Belt Studies
Bromsgrove District Council	<p>Bromsgrove District Council is in the process of reviewing their District Plan. As part of the preparation for the plan, the Council has committed to undertake a full review of the Green Belt and published the methodology for this assessment in September 2018.</p> <p>The methodology proposes to undertake a Part 1 strategic assessment of the Green Belt involving the assessment of 'strategic parcels' of land, some of which are contiguous with the Green Belt within the Black Country and South Staffordshire. Following this, a Part 2 detailed assessment of the Green Belt is proposed, including the assessment of potential development sites.</p>
Cannock Chase District Council	<p>LUC undertook the Cannock Chase Green Belt Study in 2016 on behalf of Cannock Chase District Council. The Green Belt Study was used to develop a clear understanding of how the land in the Cannock Chase Green Belt performed against the purposes of the Green Belt.</p> <p>The Green Belt Study demonstrated that the majority of the Green Belt in the District continues to serve its purposes very well. There were four sites of Green Belt and non-Green Belt land within the study area where infill development would be well contained by existing features within the landscape. These include parcels of land in: Hednesford Hills, Fair Oak Academy, Rugeley, the southern edge of Norton Canes and the Cannock Extension Canal.</p>
Shropshire Council	<p>LUC was appointed by Shropshire Council to prepare a Green Belt assessment within the County. The purpose of this assessment was to provide Shropshire Council with an objective, evidence-based assessment of how the Shropshire Green Belt contributes to the five Green Belt purposes as set out in national policy.</p> <p>The report demonstrated that the majority of the Green Belt in Shropshire contributes to one or more Green Belt purpose. In particular, it helps to maintain the openness in key locations such as between Shifnal, Telford and Albrighton, which helps to protect the separate identity of these settlements. The assessment highlighted that the Green Belt in Shropshire plays a key strategic role in preventing the eastern expansion of Telford and the western expansion of the West Midlands conurbations of the City of Wolverhampton and the Black Country, Birmingham and Coventry. The Assessment noted that many of the development boundaries in Shropshire are tightly drawn around the urban edges of these settlements with little opportunity for further development without encroaching onto Green Belt land.</p> <p>A Stage 2 Green Belt assessment was published in December 2018 which assessed the harm of releasing potential opportunity areas from the Green Belt.</p>
Stafford Borough Council	<p>Stafford Borough Council has not undertaken a review of their Green Belt.</p> <p>Stafford Borough's Local Plan has no specific policy which addresses planning considerations for the Green Belt. Paragraph 2.19 of the Local Plan states that there is no need for the Borough to undertake a review of their Green Belt as they have sufficient land available in locations outside of the Green Belt to meet the needs of the Borough.</p>

Authority	Summary of Green Belt Studies
Wyre Forest District Council	<p>Wyre Forest District Council undertook a Green Belt Review in 2016 to inform the preparation of the new Local Plan. Due to the need for housing and other development, and the limited availability of brownfield sites within the District, other areas for development including the Green Belt needed to be explored in the Review.</p> <p>The Review was divided into two parts. Part one assessed the Green Belt against the five purposes set out in the NPPF. Part two comprised of a site analysis report which assessed potential additions to the Green Belt.</p> <p>The conclusions of the Strategic Review demonstrated that across the District, the Green Belt fulfils its Strategic purpose as part of the West Midlands Green Belt. The part two report identified five strategic allocations where the scale and form of their development is likely to cause significant change to that locality. Therefore the importance of masterplanning these sites was emphasised, as such large-scale development can bring opportunities for the positive use of the Green Belt, particularly regarding green infrastructure and access to open spaces. This was particularly the case for south-eastern and north-eastern areas of Kidderminster, where, it was suggested, a new boundary between town and country will need to be defined.</p>

3 Definition of Terms

Introduction

- 3.1 The following chapter sets out the key terms and definitions that have framed the Stage 1 and Stage 2 Green Belt assessment.

Factors affecting contribution to Green Belt purposes

- 3.2 As outlined in **Chapter 1**, there are five Green Belt purposes defined in paragraph 134 of the NPPF. The Green Belt Assessment methodology is based on the NPPF's five purposes and openness as its essential characteristic. As a precursor to the area-based assessment of Green Belt, it is necessary to gain a detailed understanding of the functionality of the Green Belt in the study area. **Chapter 2** provides the policy and environmental context for understanding the functionality of Green Belt. This information has directly informed the assessment criteria and the definitions of key terms used in the methodology.
- 3.3 The factors that affect the contribution made by land to each Green Belt purpose are not distinct to each purpose. With the exception of assistance in urban regeneration, all the Green Belt purposes can be seen to require consideration of the relationship between the assessment area, settlements and the countryside as influenced by the following common factors:
- **Development and land use** – the extent and form of existing development, and land use characteristics, affect the degree to which Green Belt can be considered to be part of the countryside rather than an extension of the urban/settled area.
 - **Location** – the position of Green Belt in relation to other distinctive pockets of Green Belt land and settlements can affect its role in relation to the potential expansion of settlements.
 - **Separating features** – physical elements such as woodland blocks, rivers and ridges or areas of primary constraint (e.g. SACs, SSSIs) have a physical and visual impact on settlement-countryside relationships.
 - **Connecting features** – physical elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.
- 3.4 In addition to the five purposes of Green Belt, the NPPF refers to two 'essential characteristics': 'openness' and 'permanence'. Both characteristics are applicable to all assessment criteria. These are defined in more detail below.

Openness

- 3.5 As outlined above, the NPPF identifies openness as an 'essential characteristic' of Green Belt, rather than a function or purpose. Openness is therefore seen as a key element in the assessment of all Green Belt purposes. Land that lacks openness will play less of a role in preventing sprawl, separating towns, preventing countryside encroachment or providing a setting to a historic town.
- 3.6 Three important high court and court of appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) and Samuel Smith Old Brewery (Tadcaster) and Oxtan Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018), define openness as having both a spatial aspect and a visual aspect²³.

²³ See para. 2.24 above for more details.

- 3.7 **Spatial openness** as a characteristic can be considered in terms of the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt²⁴. Similarly, the location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to affect openness. The NPPF lists in paragraph 145 a number of types of buildings that are 'not inappropriate' within the Green Belt. As a matter of law, development such as agriculture and forestry which is appropriate in the Green Belt and is not required to 'preserve the openness' of the Green Belt cannot be considered to impinge on its openness²⁵.
- 3.8 **Visual openness** is important in so far as it relates to the purposes of Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2); openness of aspect is a characteristic quality of the countryside, therefore 'safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting...of historic towns' (Purpose 4) includes visual setting²⁶. For example, a range of natural and man-made features – topography, vegetation, buildings and linear features such as roads and railways – can contribute to or compromise the visual openness of the Green Belt. A key distinction however is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact, this does not diminish the *spatial openness* of the Green Belt.
- 3.9 As noted by the Inspector to the Welwyn Hatfield Borough Council Local Plan Examination (2017) (see **Chapter 2**) openness is not concerned about the character of the landscape, but instead relates to the '**absence of built development and other dominant urban influences**'.

Permanence

- 3.10 Green Belt is a permanent planning designation. Therefore, it is recognised that there are benefits in using features which are clearly defined and which also play a physical or visual role in separating town and countryside to act as Green Belt boundaries.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 3.11 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built-up urban areas, because that is its principal purpose as a strategic planning designation. However, the Study requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.
- 3.12 For the purpose of this study, it is necessary to define what constitutes a 'large built-up area' within and in close proximity to South Staffordshire and what is meant by the term 'sprawl'.

The definition of 'large built-up area' for South Staffordshire

- 3.13 The Green Belt within the study area forms part of the West Midlands Green Belt surrounding the West Midlands conurbation comprising Birmingham, Sutton Coldfield, Solihull, and the City of Wolverhampton, Walsall, West Bromwich, Dudley, Stourbridge and Halesowen. The Green Belt prevents the sprawl of this 'large built-up area' into the surrounding countryside. The West Midlands Green Belt also encircles the City of Coventry and the towns of Cannock and Hednesford, Burntwood, Redditch, Bromsgrove, Kidderminster, Albrighton, Shifnal, Aldridge and Brownhills, and it partly encircles the towns of Rugeley, Lichfield, Tamworth and Bedworth.

²⁴ This point is made in the judgement in *Heath & Hampstead Society v London Borough of Camden* (2008); see para. 2.24 above.

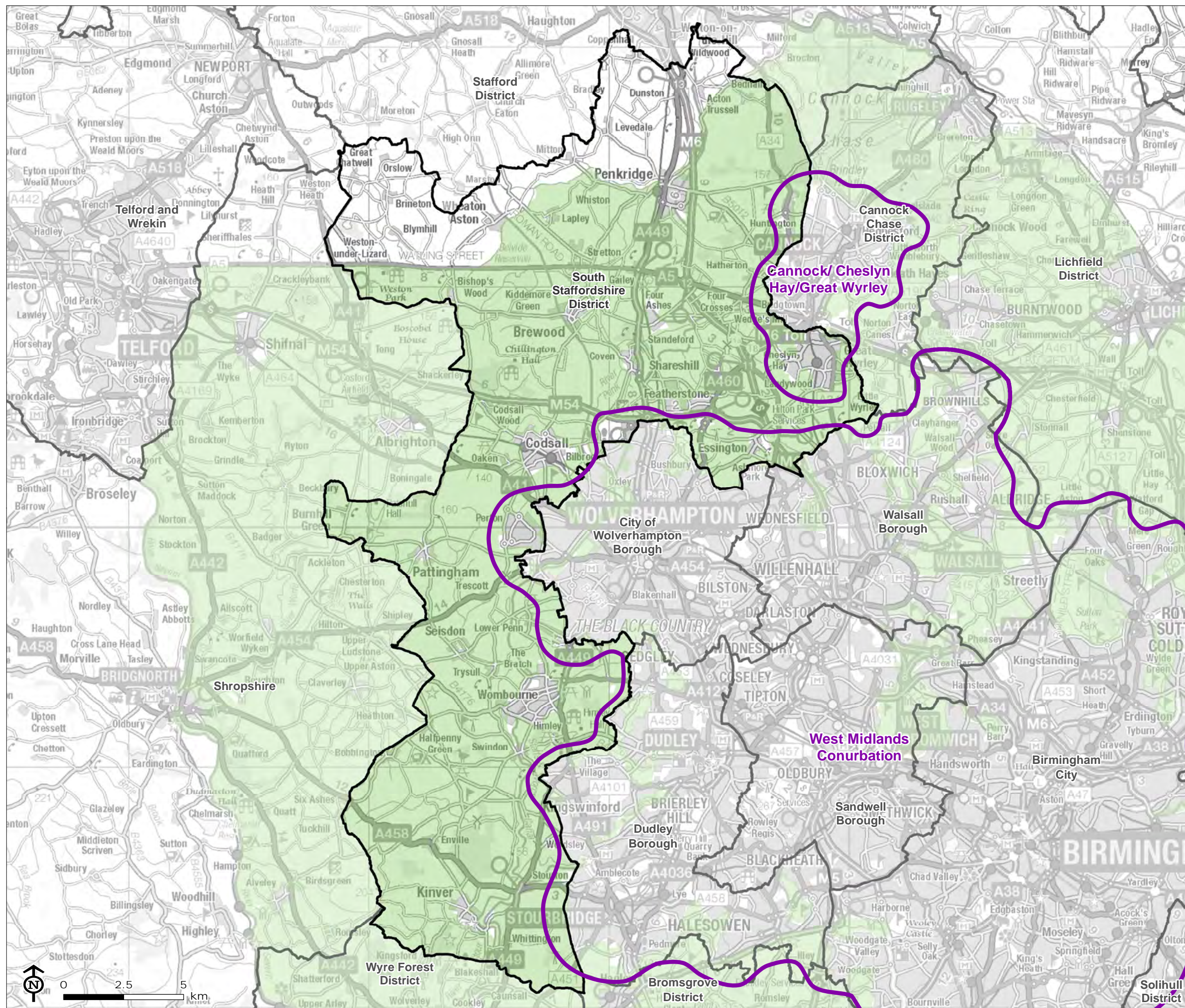
²⁵ *Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd* (2016); see para. 2.24 above.

²⁶ This point is made in the judgement in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (2016); see para. 2.24 above.

- 3.14 There is no definition provided in the NPPF for a large built-up area. While the West Midlands conurbation is made up of a number of settlements, some of considerable size, each often with their own distinct sense of identity, there is a visible continuous urban mass that stretches across the authority areas. All settlements within this main urban area are therefore considered to form part of the large built-up area in the assessment of Purpose 1.
- 3.15 **Figure 3.1** indicates the area that has been identified as the West Midlands conurbation, which is defined as the main 'large built-up area' to which Purpose 1 relates. It includes those settlement areas deemed close enough to the 'core' urban area for development associated with them to be considered to be part of the 'large built-up area', including the towns of Aldridge and Brownhills and other settlements including Pelsall, Rushall, Shelfield, Tettenhall and Perton. The village of Bilbrook (contiguous with Codsall) is considered to have slightly stronger separation from the main built-up area of Wolverhampton than, for example nearby Perton, in terms of physical distance, the role of landscape elements (the River Penk) in creating distinction, and the historic development of the settlement area ('new' Perton has only developed since the 1970's). There is sufficient contiguity between Cheslyn Hay, Great Wyrley and Cannock and Hednesford for these to be considered a single urban area which, in terms of its overall size, is also large enough to constitute a separate large built-up area.

Definition of 'sprawl'

- 3.16 The PAS guidance states in relation to Purpose 1:
- "The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"*
- 3.17 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPi Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:
- "As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."*
- 3.18 Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the contribution land makes to preventing sprawl in a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.



South Staffordshire Green Belt Study

Figure 3.1: Settlements within the Large Built-Up Area Under Purpose 1 - Checking the Unrestricted Sprawl of Large Built-Up Areas

- South Staffordshire Local Authority
- Other Local Authority
- Green Belt
- Large built-up area

For the purposes of the Green Belt assessment, all settlements / built up areas within the thick purple line form part of the large built up area, rather than all land within that line.

LUC

Map Scale @A3: 1:155,000

Purpose 2: To prevent neighbouring towns from merging into one another

- 3.19 To ensure that the study takes full account of this purpose, it is necessary to define what constitutes a 'town' within and in close proximity to South Staffordshire, and what is meant by the term 'merging'.

Definition of 'towns' for Purpose 2

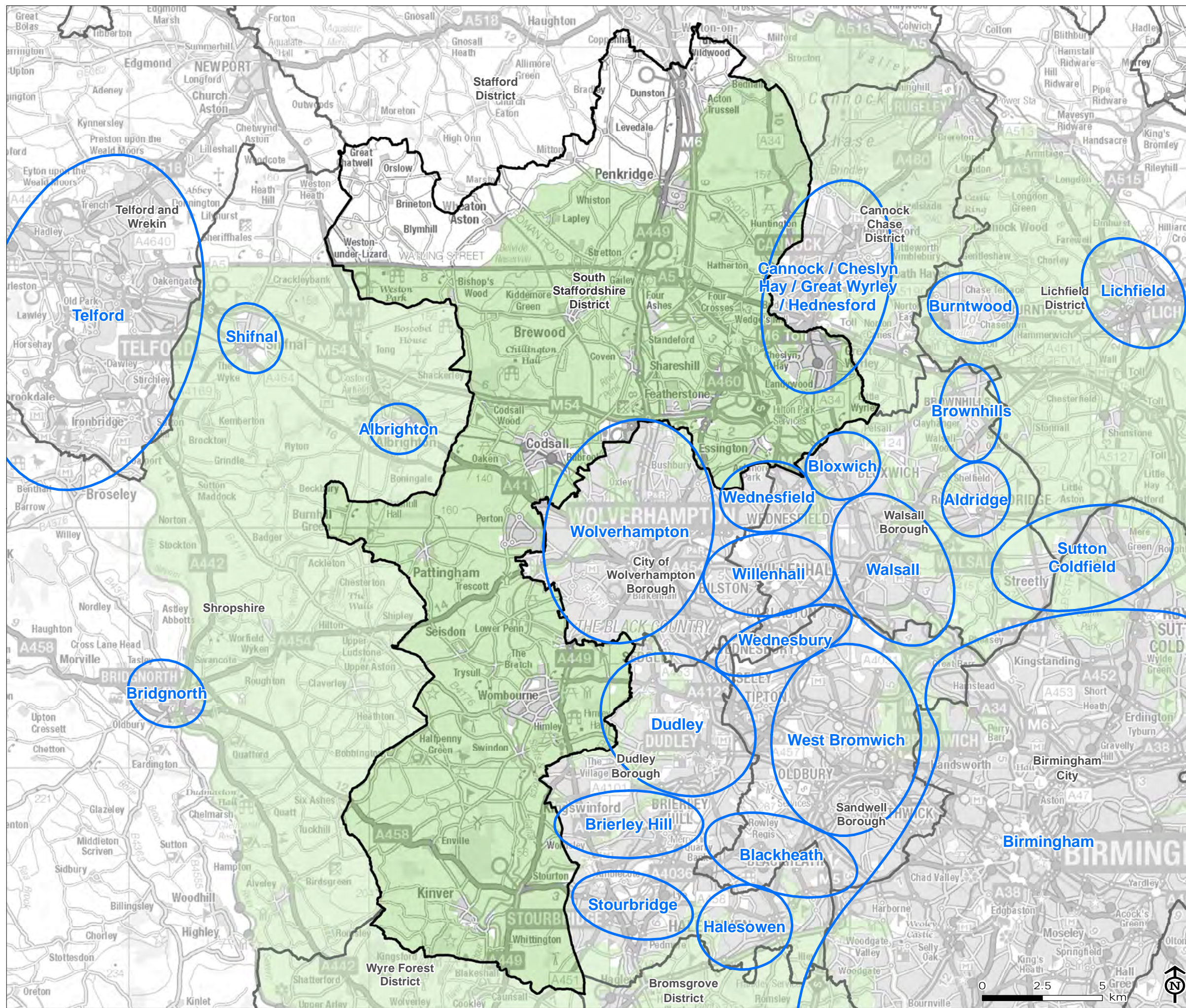
- 3.20 The South Staffordshire adopted Core Strategy²⁷ classifies the following settlements as the most significant settlements (termed Village Centres) within the settlement hierarchy: Bilbrook, Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkridge, Perton and Wombourne. South Staffordshire classes all its settlements as villages, however Great Wyrley and Cheslyn Hay are contiguous and are together considered to be of sufficient size to treat as a 'town' for the Purpose 2 assessment. As noted in paragraph 3.15 above, there is a close enough relationship between Cheslyn Hay, Great Wyrley, Cannock and Hednesford for these settlements in combination to be considered a 'large built-up area' for the assessment of Purpose 1; however Great Wyrley and Cheslyn Hay also retain sufficient distinction from Cannock to warrant the assessment, in terms of Purpose 2, of the narrow strip of Green Belt that lies between them. Although not a town in its own right, Perton is sufficiently close to Wolverhampton, for these settlements to be considered to constitute part of a town.
- 3.21 **Table 3.1** lists settlements defined as 'towns' for the Purpose 2 assessment. Towns outside South Staffordshire but within close proximity to the study area that have been identified as towns for Purpose 2 are also included in the table. Their locations are illustrated in **Figure 3.2**.

Table 3.1: Settlements defined as Towns for Purpose 2

Towns within South Staffordshire	Neighbouring Authorities and Relevant Towns	
<ul style="list-style-type: none"> Cheslyn Hay together with Great Wyrley. Perton as merged with Wolverhampton. 	Cannock Chase District Council	<ul style="list-style-type: none"> Cannock and Hednesford.
	City of Wolverhampton Council	<ul style="list-style-type: none"> Wolverhampton. Wednesfield.
	Telford & Wrekin Council	<ul style="list-style-type: none"> Telford.
	Dudley Borough Council	<ul style="list-style-type: none"> Brierley Hill. Dudley. Stourbridge. Halesowen.
	Shropshire Council	<ul style="list-style-type: none"> Bridgnorth. Shifnal. Albrighton.
	Lichfield District Council	<ul style="list-style-type: none"> Burntwood. Lichfield.

²⁷ South Staffordshire Council (2012) Core Strategy. Available at: www.sstaffs.gov.uk/planning/the-adopted-core-strategy.cfm.

- 3.22 Shifnal and Albrighton are defined as the Principal Centres/Key Centres in the Shropshire Hierarchy of Settlements (2017) and were towns considered as part of the Shropshire Green Belt Assessments. The nature of the settlement pattern in Shropshire means that these places have more of a town function than is the case for smaller settlements in South Staffordshire and the adjoining Black Country authorities.
- 3.23 In South Staffordshire (as noted in paragraph 3.20 above) there are villages that sit within or which adjoin the Green Belt, including Bilbrook, Brewood, Codsall, Kinver, Penkridge, Perton and Wombourne. It is recognised that the perceived gaps between towns will in turn be affected by the size of gaps associated with smaller, intervening settlements. Full account is therefore taken of the role that smaller settlements play in preventing the merging of 'towns'.
- 3.24 The locations of settlements identified as towns in terms of Green Belt Purpose 2 are indicated on **Figure 3.2**.



South Staffordshire Green Belt Study

Figure 3.2: Settlements Identified as Towns Under Purpose 2 - Preventing the Merging of Neighbouring Towns

- South Staffordshire Local Authority
- Other Local Authority
- Green Belt
- Towns

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.25 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment.
- 3.26 In order to effectively assess the effects of encroachment on countryside, it is important to determine the extent to which Green Belt land:
- contains, or is influenced by urbanising land uses and features; and
 - relates to adjacent settlements and to the wider countryside.
- 3.27 Urbanising land uses and features are considered to include any features that diminish openness or compromise the rural character of the countryside.
- 3.28 Paragraphs 145 and 146 of the NPPF and associated case law provide guidance on what land uses and features are considered to be 'appropriate' development in the Green Belt (see **Chapter 2**). Appropriate development within the Green Belt cannot, according to case law²⁸, be considered to have an urbanising influence and therefore harm Green Belt purposes
- 3.29 Care therefore needs to be taken in the assessment to ensure that development which is deemed to be appropriate is not treated as an urbanising influence. However, what is deemed to be appropriate development in the NPPF has to be carefully considered as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriateas long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 3.30 We have therefore exercised caution in the application of what is defined as an appropriate use. It is not possible within a Strategic GB study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut eg for example buildings for agriculture and forestry are deemed to be appropriate development in absolute terms regardless of whether they preserve the openness or conflict with the GB purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, we have taken a considered view on the extent to which the proposed land use has affected the GB purposes for example by affecting openness, or encroaching on the perception of countryside ie the sense of distinction between the urban area and countryside etc.
- 3.31 The methodology doesn't distinguish between different 'degrees' of countryside beyond considering urban influence, as this would stray into assessing the impact on landscape character. If land further from an urban area is, for example more 'rural' and tranquil, this is a landscape sensitivity issue which is considered separately in the landscape sensitivity assessment.

Purpose 4: To preserve the setting and special character of historic towns

- 3.32 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. The purpose makes specific reference to 'historic towns' not individual historical assets or smaller settlements such as villages and hamlets.

²⁸ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.

- 3.33 An extract from Hansard in 1988 clarifies which historic settlements in England were 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 Cambridge²⁹. Durham has since been added to this list.
- 3.34 For the purpose of this assessment, only elements of the historic environment which relate to the character of historic towns and their wider setting have been considered when assessing Purpose 4. This is supported by the PAS guidance³⁰ which states:
- "This purpose is generally accepted as relating to very few settlements in practice."*
- 3.35 The Greater Birmingham HMA Strategic Growth Study³¹ assessed the relationship between the Green Belt and historic settlements, identifying areas where the *"Green Belt helps to preserve the setting and character of an historic town."* On this basis, it identified Stratford upon Avon, Kenilworth, Lichfield, Rugeley, Penkridge, Bridgnorth and Bewdley as historic towns. Of these, Stratford upon Avon, Kenilworth, Bewdley and Rugeley were not considered further in relation to this study, given their distance from South Staffordshire and the presence of intervening towns.
- 3.36 Informed by the approaches above, as well as Green Belt studies for neighbouring authorities, the study therefore considered whether there are any historic towns which have a relationship with the landscape which is important to their setting and special character. It should be noted that presence of historic towns within, and in the proximity of the Study area, does not necessarily mean that the Green Belt in South Staffordshire contributes to their setting and special character. No towns were identified as 'historic towns' in relation to Purpose 4 for this study, for the reasons set out below.

South Staffordshire

- 3.37 The South Staffordshire Historic Environment Character Assessment³² identifies the settlements of Penkridge, Kinver and Brewood as historic towns which were established as market towns during the medieval period. However, the Core Strategy describes South Staffordshire as being composed of a diverse settlement pattern of villages, with no towns in its settlement hierarchies³³. Therefore, this study does not identify any historic towns within South Staffordshire for the Purpose 4 assessment.

Cannock Chase

- 3.38 The Green Belt assessment in the neighbouring District of Cannock Chase³⁴ identified areas of land within that District which contributed to the setting and special character of Cannock and Rugeley. Cannock was considered further as part of this study, as set out below. Given the separation and distance between Rugeley and the South Staffordshire Green Belt, this town was not considered further as part of this study.

²⁹ Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) Response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.

³⁰ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

³¹ GL Hearn and Wood plc (2018) Greater Birmingham HMA Strategic Growth Study. Available at: www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study.

³² Staffordshire County Council (2011) Historic Environment Character Assessment: South Staffordshire. Available at: www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Environment-Assessments.aspx#SouthStaffsHEA.

³³ South Staffordshire Council (2012) Core Strategy. Available at: www.sstaffs.gov.uk/planning/the-adopted-core-strategy.cfm.

³⁴ LUC (2016) Cannock Chase Green Belt Study. Available at: www.cannockchasedc.gov.uk/content-z-tags/evidence-base

- 3.39 Cannock was a small rural community until expansion in the latter part of the 19th century in association with the mining industry. The Cannock Conservation Area Appraisal³⁵ notes the extent of containment of the historic core by later development, and makes no reference to the role of countryside in forming a setting or contributing to character. This core is some distance from prominent landscape features – notably Cannock Chase to the north and, within South Staffordshire, the wooded heathland of Shoal Hill - and although there is some intervisibility, it is not considered that Cannock derives any ‘special character’ from a relationship with the South Staffordshire Green Belt.

Black Country

- 3.40 While the historic origins of the Black Country’s city and towns are acknowledged: many have long histories, some have historic features (e.g. Dudley Castle), and some have a visual relationship with the Green Belt (e.g. Walsall, Aldridge). However, none are considered to have a special character to which its landscape setting makes sufficient contribution to warrant assessment in relation to Purpose 4.

Shropshire

- 3.41 The character of Bridgnorth is partly derived from its landscape setting at a crossing of the Severn within a narrow valley, but land in South Staffordshire is too distant to make a contribution to this. Similarly, no other towns in Shropshire were considered to derive any setting or special character from a relationship with land within the South Staffordshire Green Belt.

Lichfield

- 3.42 The cathedral city of Lichfield has been identified as a historic town and it does have a relationship with its landscape setting which contributes to its special character. The city is contained within a dip of lower land, and there are views of the historic core and cathedral from the surrounding area³⁶. Views of the cathedral spires are available from a wider area, including from higher ground. However, land within the South Staffordshire Green Belt is too distant to make a contribution to its setting or special character.

Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 3.43 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that one parcel of Green Belt land makes a higher contribution to encouraging re-use of urban land than another. The PAS guidance states:

“...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.”

- 3.44 In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.
- 3.45 However, the examination reports of some planning inspectors, e.g. Cheshire East Council’s Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting. It is also important to consider local circumstances in relation to brownfield land, before concluding whether all land should be rated equally against Purpose 5.

³⁵ Cannock Chase Council (2014) Cannock Town Centre Conservation Area Appraisal. Available at: <https://www.cannockchasedc.gov.uk/content-z-tags/conservation-areas>

³⁶ Lichfield City Conservation Area Appraisal (2008). Available at: <https://www.lichfielddc.gov.uk/Council/Planning/Conservation-and-listed-buildings/Conservation-areas.aspx>

- 3.46 Since the publication of the PAS Guidance and the Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development, where sites are over 0.25ha. Together, these registers provide an overview and estimate of the available brownfield land within individual authority areas for housing. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – a Housing and Economic Land Availability Assessment (HELAA). However, the HELAA is not required to identify whether land is previously developed.
- 3.47 South Staffordshire borders the Black Country, including some of the urban areas in the Black Country and Cannock District, and lies within the same Housing Market Area. The latest Brownfield Land Registers for the Black Country, Cannock Chase and South Staffordshire have been used to estimate the area of brownfield land which is suitable and available for housing development within the Study Area within the next Plan period.
- 3.48 The Brownfield Registers for South Staffordshire District³⁷, the City of Wolverhampton³⁸, Dudley Borough³⁹, Walsall Borough⁴⁰, Sandwell Borough⁴¹ and Cannock Chase Council⁴² contain a record of 978.97ha of brownfield land which is suitable and available for housing within the Black Country. However, this does not include brownfield land which may be suitable for employment and other uses.

Table 3.2: Brownfield Land Register for Black Country, South Staffordshire and Cannock

Local Authority:	South Staffordshire Council	City of Wolverhampton Council	Walsall Borough Council	Dudley Borough Council	Sandwell Borough Council	Cannock Chase Council
Total area (ha) in Brownfield Registers	13.11	311.27	62.42	57.69	454.84	79.64

- 3.49 The adopted Black Country Core Strategy (2011) states in Policy HOU1 that over 95% of housing development will be built on previously developed land, including within a series of regeneration corridors (over a plan period of 2006-2026).
- 3.50 Given the importance of continuing to regenerate existing urban areas within the Black Country, as set out in the Core Strategy, and evidenced by the brownfield land registers, it is clear that the Green Belt has had, and will continue to play an important role in encouraging the recycling of derelict and other previously developed land within the urban area.
- 3.51 While in South Staffordshire there is much less brownfield land, the District borders the Black Country including some of the urban areas in the Black Country and Cannock District, and lies within the same Housing Market Area. As such Green Belt within South Staffordshire is also performing a key role in recycling brownfield land.
- 3.52 However, whilst it can be concluded that all of the Green Belt land within South Staffordshire makes a contribution to Purpose 5, it is not possible to determine on a parcel by parcel basis, which areas of Green Belt are playing a stronger or more moderate role with respect to Purpose 5.

³⁷ South Staffordshire District Council (2017) Brownfield Register. Available at: www.sstaffs.gov.uk/planning/brownfield-land-register.cfm.

³⁸ Wolverhampton City Council (2019) Wolverhampton Housing Sites with Brownfield Register - Brownfield Register 2019. Available at: www.wolverhampton.gov.uk/article/2423/Housing-Site-Information.

³⁹ Dudley Borough Council (2017) Brownfield Register. Available at: www.dudley.gov.uk/resident/planning/brownfield-land-register/?entryid235=307581.

⁴⁰ Walsall Borough Council (2018) Brownfield Register. Available at: go.walsall.gov.uk/environment/planning/planning_policy/local_plans/housing_land_supply.

⁴¹ Sandwell Borough Council (2018) Brownfield Register. Available at: www.sandwell.gov.uk/downloads/download/2062/sandwell_brownfield_register.

⁴² Cannock Chase Council (2018) Brownfield Register. Available at: www.cannockchasedc.gov.uk/residents/planning/planning-policy/planning-policy-monitoring.

Part B: Stage 1 Methodology and Findings



4 Stage 1 Methodology

Introduction

- 4.1 The following chapter sets out the methodology for the Stage 1 Green Belt Assessment. The primary aim of the Stage 1 assessment was to establish the variation in the contribution of land to achieving the Green Belt purposes as defined by the NPPF. Based on the assessment criteria outlined below, a strategic review of the contribution of all Green Belt land within the Council areas to each of the five Green Belt purposes was undertaken. This drew out spatial variations in the contribution of Green Belt land to each Green Belt purpose.

Strategic Assessment Process

- 4.2 Prior to any detailed assessment work, an initial visit was made to the area, to gain an overview of the spatial relationships between the settlements and the countryside in South Staffordshire.
- 4.3 The first main step then involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined in **Chapter 3** above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density, not to affect to its designation as Green Belt.
- 4.4 The second step assessed the fragility of gaps between the settlements identified in **Chapter 3** as 'towns' under Green Belt Purpose 2.
- 4.5 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of development – i.e. in the first instance the Wolverhampton-Walsall conurbation –through to the smaller inset⁴³ villages. If any significant areas of washed-over⁴⁴ urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside (as described in **Paragraph 4.3** above), the analysis:
- assessed the strength of relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features;
 - identified changes in the strength of relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features; and
 - considered how these spatial relationships affect contribution to each of the Green Belt purposes, and mapped lines to mark these changes.
- 4.6 The analysis progressed outwards from each settlement until it was determined that land:
- ceases to play a significant role in preventing sprawl of a large built-up area;
 - either makes a consistent contribution to settlement separation, or makes no contribution to this purpose;
 - is strongly distinct from urban settlement and has a strong relationship with the wider countryside; and
 - makes no contribution to the setting or special character of a historic town.

⁴³ 'Inset' development is development that is surrounded by Green Belt land but is not itself located within the Green Belt designation.

⁴⁴ Development 'washed-over' by the Green Belt is development that is located within the Green Belt designation.

Criteria for Assessment of Green Belt Contribution

- 4.7 To draw out clear variations in contribution to each Green Belt purpose the three point scale set out in **Table 4.1** was used.

Table 4.1: Green Belt Contribution Ratings

Strong Contribution	Green Belt performs well against the purpose.
Moderate Contribution	Green Belt performs moderately well against the purpose.
Weak/No Contribution	Green Belt makes weak or no contribution to the purpose.

Purpose 1 Assessment Criteria

- 4.8 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). **Figure 3.1** indicates which settlements lie within large built-up areas. All of the development forms noted in the RTP1 note (see **para 3.17**) have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development, or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF⁴⁵).
- 4.9 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution.
- 4.10 Land which is more clearly associated with a settlement that is not a large built-up area can be considered to make no direct contribution to Purpose 1.
- 4.11 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
- Does the land lie in, adjacent to, or in close proximity to the large built-up area?
 - To what extent is the land open or does it contain existing urban development?
 - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
 - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl?
 - What is the degree of containment by existing built development or other features (e.g. by landform)?

⁴⁵ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it cannot be "urban sprawl" and cannot have an "urbanising influence".

4.12 **Table 4.2** summarises the criteria that were used for the assessment of Purpose 1.

Table 4.2: Purpose 1 assessment criteria

Purpose 1: Check the unrestricted sprawl of large built-up areas	
<p>Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.</p> <p>Location: land closer to the large, built-up area generally makes a stronger contribution.</p> <p>Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.</p> <p>Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.</p>	
Strong Contribution	Land adjacent or close to the large built-up area that contains no or very limited urban development and has strong openness. It retains a relatively strong relationship with the wider countryside.
Moderate Contribution	Land adjacent or close to the large built-up area that contains some urban development and/or is to an extent contained by urban development, but retains openness and some relationship with the wider countryside.
Weak/No Contribution	<p>Land adjacent or close to the large built-up area that is already fully urbanised; or</p> <p>land that is too contained by development to have any relationship with the wider countryside; or</p> <p>land that is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built-up area.</p>

Purpose 2 assessment criteria

- 4.13 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considered both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This approach accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Settlements identified as towns are listed in **Table 3.1** and indicated on **Figure 3.2**.
- 4.14 Land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity was the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement was made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced.
- 4.15 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements also reduce the amount of countryside between towns, particularly as perceived from connecting roads.

- 4.16 In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, include:
- Does the land lie directly between two settlements being considered under Purpose 2?
 - How far apart are the towns being considered?
 - Is there strong intervisibility between the towns?
 - How do the gaps between smaller settlements affect the perceived gaps between towns?
 - Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
 - Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
 - What is the overall fragility/ robustness of the gap taking the above into account?

4.17 **Table 4.3** summarises the criteria that were used for the assessment of Purpose 2 in the study.

Table 4.3: Purpose 2 assessment criteria

Purpose 2: Prevent neighbouring towns from merging	
<p>Development/land-use: less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p>Location: land juxtaposed between towns makes a stronger contribution.</p> <p>Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p>Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p>Connecting features: where physical features strengthen the relationship between towns, e.g. where they are directly linked by a major road or have a strong visual connection, or where smaller urban settlements lie in between, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.</p>	
Strong Contribution	Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them.
Moderate Contribution	<p>Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or</p> <p>land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.</p>
Weak/No Contribution	<p>Land which is not located within a gap between towns; or</p> <p>land which plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or</p> <p>land which plays no significant role due to the extent of development; or</p> <p>land forming a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).</p>

Purpose 3 assessment criteria

- 4.18 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
- the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses; and
 - the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).
- 4.19 Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through: i) the scale of development; or ii) the degree of containment of the open land by development. Also the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 4.20 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view. However the same land in Green Belt terms may well make as equal a contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
- 4.21 In summary, key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urbanising development?
 - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
 - Does land relate more strongly to the settlement(s), or to the wider countryside?
- 4.22 **Table 4.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

Table 4.4: Purpose 3 assessment criteria

Purpose 3: Assist in safeguarding the countryside from encroachment	
Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution.	
Separating features: land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.	
Connecting features: an absence of physical features to link settlement and countryside means that land makes a stronger contribution.	
Strong Contribution	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms ⁴⁶) and which does not have a stronger relationship with the urban area than with the wider countryside.

⁴⁶ This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

Moderate Contribution	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features); or Land which retains some degree of openness and has some relationship with the wider countryside but which is compromised by urbanising development or uses within it.
Weak/No Contribution	Land that contains urbanising development of a scale, density or form that significantly compromises openness; or Land which is too influenced and contained by urban development to retain any significant relationship with the wider countryside.

Purpose 4 assessment criteria

- 4.23 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 4.24 In summary, key questions asked in assessing Purpose 4 include:
- What is the relationship of the land with the historic town?
 - Does the land form part of the setting and/or special character of an historic town?
 - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 4.25 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic towns.
- 4.26 **Table 4.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

Table 4.5: Purpose 4 assessment criteria

Purpose 4: Preserve the setting and special character of historic towns	
Development/land-use: less developed land makes a stronger contribution. Location: an area that contains key characteristics, or important in views to or from them, makes a stronger contribution. Separating features: land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution. Connecting features: where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.	
Strong Contribution	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's setting or special character.
Moderate Contribution	The land and its openness makes some contribution to the characteristics identified as contributing to a historic town's setting or special character.
Weak/No Contribution	Land forms little or no part of the setting of an historic town and does not contribute to its special character.

Purpose 5 assessment criteria

- 4.28 As set out in **Chapter 3** above, it was not considered possible to reasonably differentiate between the contribution of different parts of the Green Belt to Purpose 5. Given the historic and continued strategy to recycle brownfield land in the adjoining Black Country authorities, as set out in the Black Country Core Strategy and targeted through identified regeneration areas, the significant area of brownfield land within the Black Country, the presence of brownfield land within South Staffordshire, and the location of South Staffordshire and the Black Country authorities within the same Housing Market Area, it is concluded that all Green Belt land within South Staffordshire makes a strong contribution to urban regeneration by encouraging the recycling of derelict and other urban land.

Stage 1 Strategic Assessment Outputs

Analysis of variations in contribution to Green Belt purposes

- 4.29 The Stage 1 outputs are discussed in **Chapter 5**. Maps illustrating the assessed variations in contribution for each purpose across South Staffordshire are also set out in **Chapter 5**. Each map is accompanied by supporting text describing the pattern of variation and the reasoning behind its definition.
- 4.30 By combining the lines marking variations in contribution to Green Belt purposes, a list of land parcels was generated, each of which has a reference number and a rating for contribution to each purpose. The parcels are the product of the assessment rather than a precursor to it. The reasoning behind this approach was to draw out variations in contribution to inform the site-specific assessments undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Avoiding significant variations in contribution within defined parcels prevents the need for ratings to be generalised to reflect the strongest or average level of contribution within a defined area.

5 Stage 1 Findings

Introduction

- 5.1 The primary aim of the Stage 1 assessment was to establish the variation in the contribution of designated land to achieving Green Belt purposes. Based on the assessment definitions and criteria outlined in **Chapters 3** and **4**, a review of the contribution of Green Belt land to each of the Green Belt purposes was undertaken, drawing out spatial variations in the contribution of Green Belt land to each Green Belt purpose. This chapter summarises the findings of the Stage 1 assessment.

Key Findings

- 5.2 **Figure 5.1 - Figure 5.4 (a-b)** illustrate the assessed variations in contribution across the Study Area for each of the first four purposes. The colours used in the figures correspond with the rating colours used in **Table 4.2-Table 4.5** in **Chapter 4**. The four maps were overlaid so that the resulting boundaries reflect changes in contribution to any of those Green Belt purposes, and therefore distinguish parcels of land in which the contribution to the four purposes is the same. This process has resulted in the definition of 82 parcels of varying sizes, which are illustrated in **Figure 5.5 (a-b)**. **Table 5.1** provides a summary of the contribution ratings for each parcel to each of the first four NPPF Green Belt purposes.
- 5.3 **Appendix 2** sets out the justification for the Stage 1 ratings in relation to each of the Stage 1 assessment parcels, for each of the NPPF purposes. As explained in **Chapter 4**, all parcels are considered to perform strongly against purpose 5.

Table 5.1: Assessment of Contribution Ratings for Each Parcel

Parcel No	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
S1	972.4	Weak / No contribution	Weak / No contribution	Strong	Weak / No contribution
S2	2,102.6	Moderate	Weak / No contribution	Strong	Weak / No contribution
S3	13.3	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S4	1,110.4	Strong	Weak / No contribution	Strong	Weak / No contribution
S5	4.9	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S6	44.4	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S7	15.5	Weak / No contribution	Moderate	Moderate	Weak / No contribution
S8	8.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S9	3.1	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S10	8.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S11	4.9	Moderate	Moderate	Moderate	Weak / No contribution
S12	2.0	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S13	155.1	Strong	Moderate	Strong	Weak / No contribution
S14	2.1	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S15	53.2	Strong	Strong	Strong	Weak / No contribution
S16	650.5	Strong	Strong	Strong	Weak / No contribution
S17	3.6	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S18	0.6	Weak / No contribution	Weak / No contribution	Strong	Weak / No contribution
S19	3.8	Moderate	Strong	Moderate	Weak / No contribution
S20	1,221.2	Strong	Moderate	Strong	Weak / No contribution
S21	39.9	Strong	Weak / No contribution	Strong	Weak / No contribution
S22	3.8	Moderate	Weak / No contribution	Moderate	Weak / No contribution

Parcel No	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
S23	3.3	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S24	14.9	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S25	7.7	Moderate	Weak / No contribution	Strong	Weak / No contribution
S26	7.8	Strong	Weak / No contribution	Strong	Weak / No contribution
S27	2.5	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S28	1.2	Moderate	Moderate	Strong	Weak / No contribution
S29	2.9	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S30	496.5	Moderate	Moderate	Strong	Weak / No contribution
S31	104.3	Moderate	Moderate	Strong	Weak / No contribution
S32	7,308.4	Weak / No contribution	Weak / No contribution	Strong	Weak / No contribution
S33	2.8	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S34	4.4	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S35	0.6	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S36	9.6	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S37	3.3	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S38	7.3	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S39	2.0	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S40	1.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S41	1,262.2	Moderate	Weak / No contribution	Strong	Weak / No contribution
S42	20.0	Strong	Moderate	Moderate	Weak / No contribution
S43	43.9	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S44	85.3	Moderate	Moderate	Strong	Weak / No contribution
S45	11.1	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S46	776.1	Strong	Weak / No contribution	Strong	Weak / No contribution
S47	4.0	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S48	36.0	Moderate	Weak / No contribution	Strong	Weak / No contribution
S49	3.6	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S50	2.9	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S51	885.5	Moderate	Moderate	Strong	Weak / No contribution
S52	5.6	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S53	3,072.0	Moderate	Weak / No contribution	Strong	Weak / No contribution
S54	371.7	Strong	Weak / No contribution	Strong	Weak / No contribution
S55	26.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S56	3.4	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S57	19.7	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S58	3.7	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S59	487.8	Strong	Weak / No contribution	Strong	Weak / No contribution
S60	3.7	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S61	8.6	Moderate	Weak / No contribution	Strong	Weak / No contribution
S62	3.6	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S63	0.8	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S64	6,447.0	Weak / No contribution	Weak / No contribution	Strong	Weak / No contribution
S65	11.6	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S66	4.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S67	406.4	Strong	Moderate	Strong	Weak / No contribution
S68	4.4	Strong	Weak / No contribution	Strong	Weak / No contribution
S69	117.7	Strong	Strong	Strong	Weak / No contribution
S70	2.5	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S71	749.3	Strong	Weak / No contribution	Strong	Weak / No contribution
S72	263.1	Moderate	Moderate	Strong	Weak / No contribution
S73	3.8	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S74	19.5	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S75	559.5	Strong	Weak / No contribution	Strong	Weak / No contribution
S76	10.1	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution

Parcel No	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
S77	1.5	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S78	431.7	Weak / No contribution	Moderate	Strong	Weak / No contribution
S79	10.0	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S80	18.0	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S81	787.1	Moderate	Moderate	Strong	Weak / No contribution
S82	716.5	Strong	Moderate	Strong	Weak / No contribution

Assessment of Contribution to Green Belt Purpose 1

- 5.4 Green Belt Purpose 1 seeks to check the unrestricted sprawl of large built-up areas. The West Midlands conurbation, including most land within the adjoining authorities of the City of Wolverhampton, Dudley and Walsall, is a large built-up area, and the combination of Cannock and Hednesford and the adjoining area of Great Wyrley (including Cheslyn Hay) is also defined as a large built-up area.

North of the West Midlands conurbation

- 5.5 The M54 and associated and nearby woodland create a physical and visual screen between the conurbation and countryside to the north, but play a weaker role where large commercial buildings dominate the urban edge at the I54 industrial estate. Land north of the motorway in the Coven Heath area therefore has an association with the large built-up area despite clear separation by a significant boundary, and so contributes strongly to preventing sprawl. There are no specific physical features to the west of Coven and Coven Heath that mark a distinction between areas considered to make a strong contribution, moderate or weak contribution to this purpose, but the absence of other settlements with which land can be associated is considered to increase the extent to which it is associated with the nearby large built-up area.
- 5.6 Brinsford and Featherstone are likewise separated from the large built-up area by the M54 but the proximity of development between Moseley Parklands and Brinsford along Cat and Kittens Lane, and the lack of any significant gaps in development along the A460 between the urban edge at Westcroft and the village of Featherstone to the north of the M54, means that land between these settlements and the large built-up area plays a significant role with regard to this purpose. Residential development and most of the prison at Brinsford are washed over, but the impact of development on openness limits their contribution to Green Belt purposes.
- 5.7 Open land adjacent to Brinsford, Featherstone or Coven that contributes to separation between those settlements is judged to make a moderate contribution to preventing sprawl of the large built-up area, as it helps to retain a distinction between separate villages and more contiguous urban development, but land to the north of these settlements is considered to make a weaker contribution in this respect.
- 5.8 The size of the Green Belt area contained between the M54 and the large built-up area means that it is for the most part not sufficiently contained by urbanising influences for development to be considered infill rather than expansion. The absence of any significant separating features to diminish association with the large built-up area therefore means that contribution to Purpose 1 is strong. This includes land around Essington, because there is little separation between the inset village and the large built-up area.
- 5.9 Land in the narrow gap between the West Midlands Conurbation and the Cannock/ Hednesford/ Cheslyn Hay/ Great Wyrley large built-up area makes a *strong* contribution to Purpose 1.

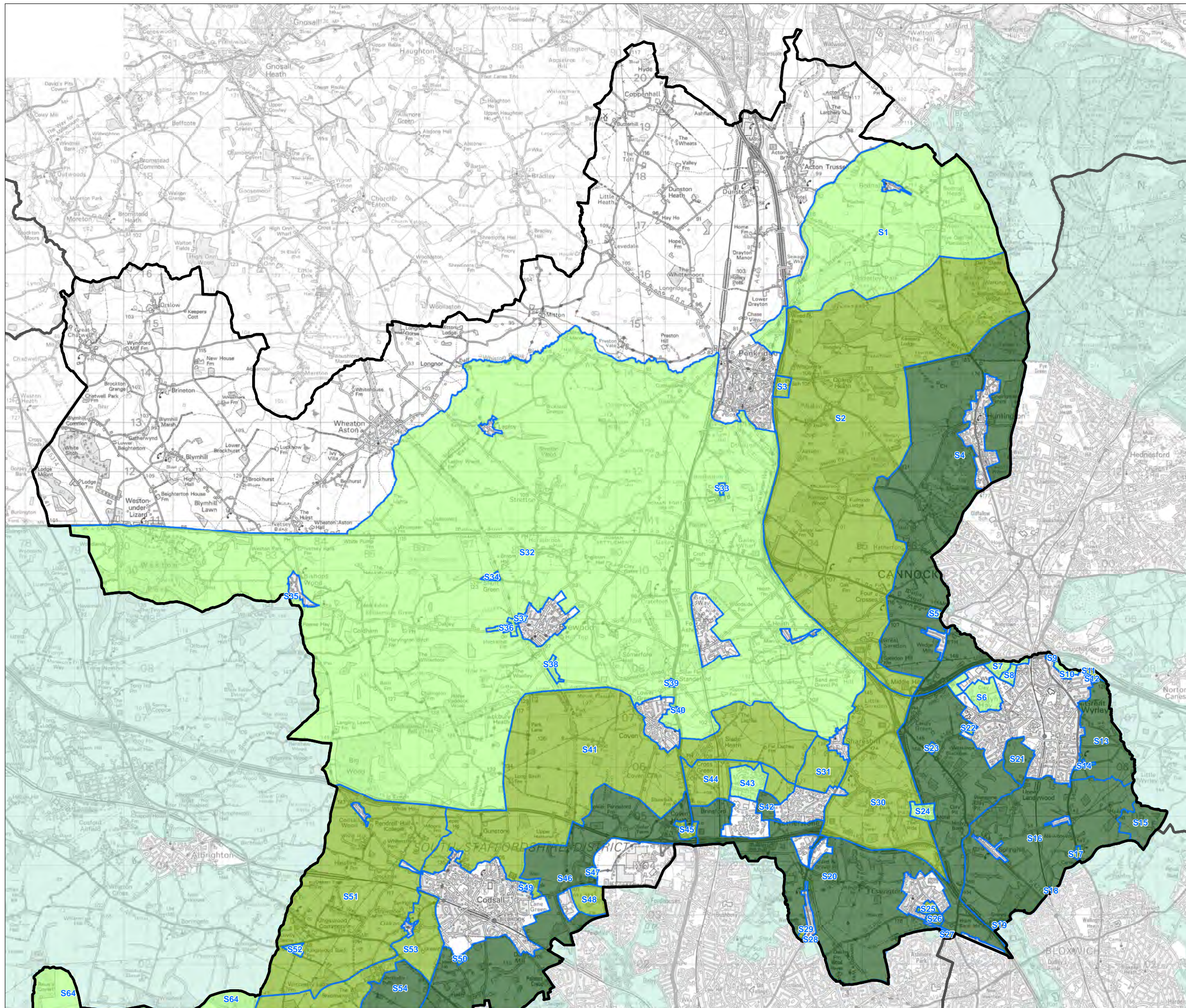
West of the West Midlands conurbation

- 5.10 Most land in South Staffordshire close to the conurbation lacks strong containment by development and therefore makes a *strong* contribution to Purpose 1.

- 5.11 The limited separation between Codsall, Wombourne and the contiguous conurbation, and the narrow separation between Perton and Tettenhall, means that land adjacent to these settlements that forms part of their separation, and which also retains a relationship with the wider countryside and is not dominated by the urban area, is considered to make a strong contribution to Purpose 1. Reduction in separation would increase the extent to which the settlements are perceived to form part of the large built-up area. However there are a few locations within the narrower strips/wedges of Green Belt that separate villages (e.g. Perton) from the main body of the conurbation that are too contained to make a strong contribution, regardless of openness.
- 5.12 Westward expansion of these settlements would also be considered to have an association with the large built-up area, but contribution of land to this purpose is moderate because the direct association is with settlements that still retain some separation of identity from the main conurbation.

West of Cannock

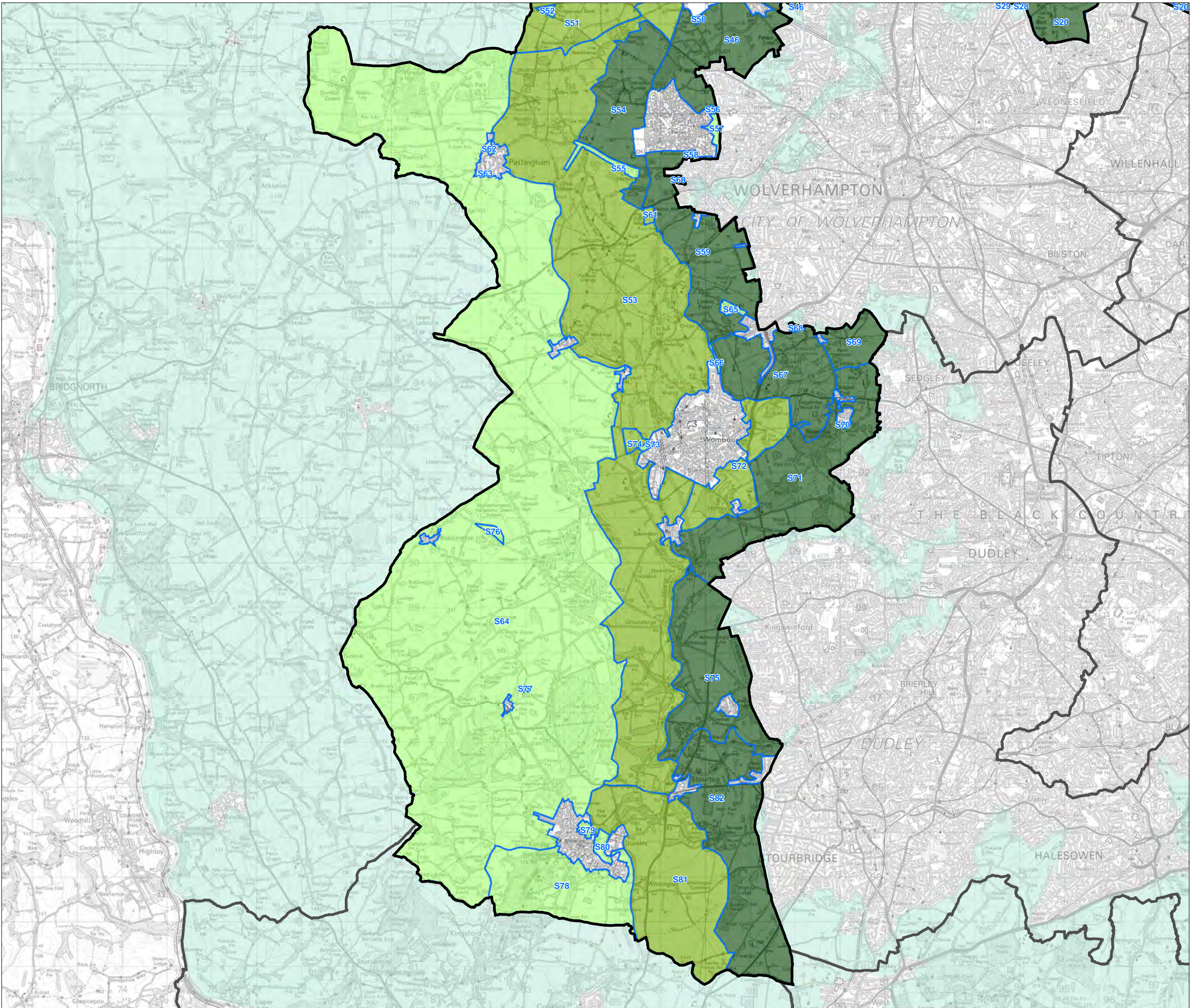
- 5.13 There is a distinct ridge crest woodland belt forming an edge to the northern part of the Cannock urban area, and separating the main body of the town from Huntington, a settlement which is contiguous at its southern end but which occupies a distinct setting contained by landform and woodland along its southern half. Open land in this area is therefore considered to make a *strong* contribution to preventing sprawl.
- 5.14 The wooded heathland of Shoal Hill creates a strong distinction between the large built-up area and land to the west but there is insufficient separation for land not to make a *moderate* contribution to Purpose 1.
- 5.15 Further south, down to the A5, Hatton Road forms a consistent, unbroken settlement edge (with tree cover in most places), and beyond this the parkland around Hatherton Hall and low hills contain the urban edge and so play a *strong* role in preventing sprawl. South of the A5, Saredon Brook and Lodge Hill define a clear urban edge so land beyond also makes a *strong* contribution.



South Staffordshire Green Belt Study

Figure 5.1a: Green Belt Purpose 1 -
Checking the Unrestricted Sprawl of
Large Built-Up Areas - South
Staffordshire North

- South Staffordshire (North)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 1 rating
 - Strong
 - Moderate
 - Weak / No contribution



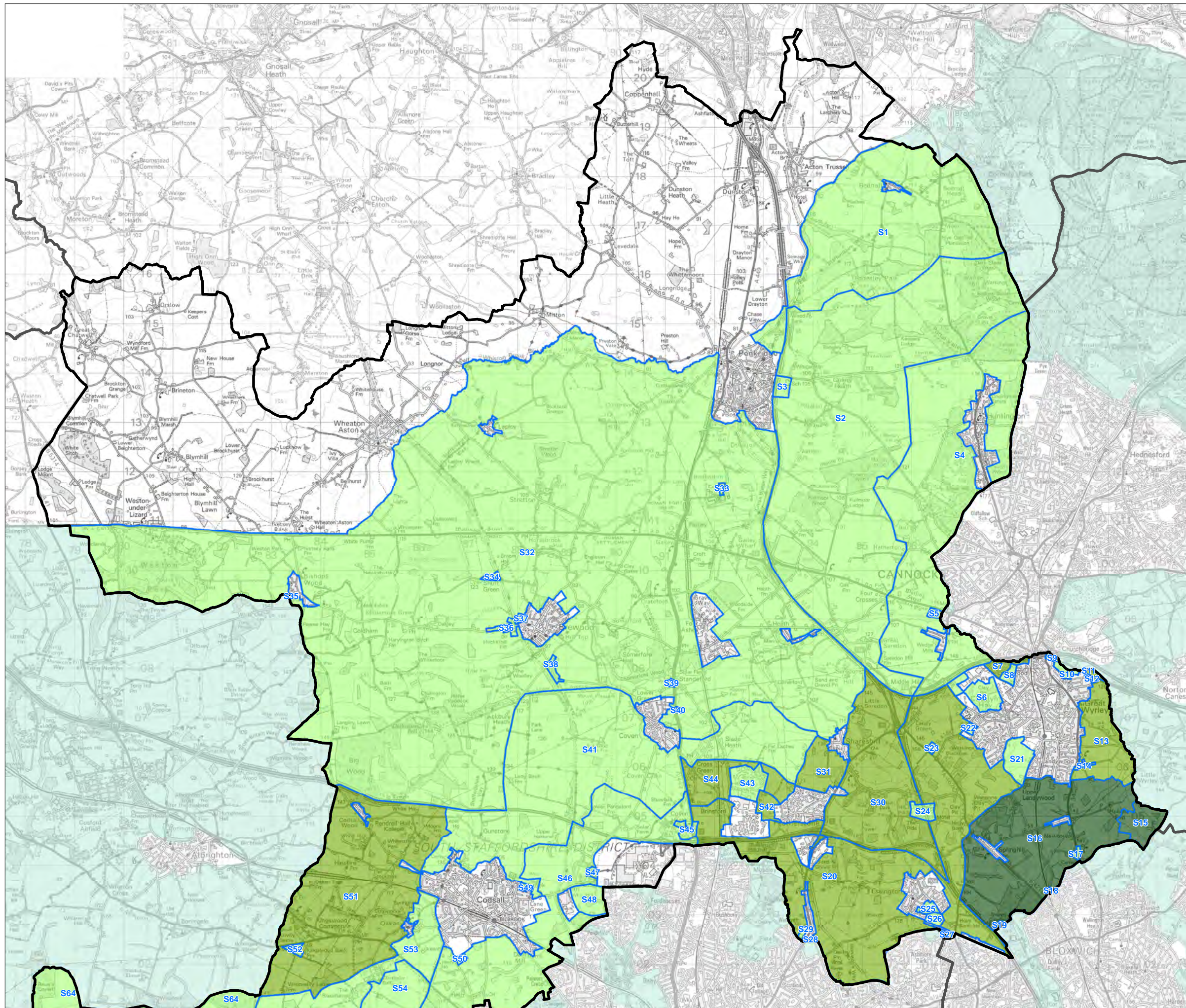
South Staffordshire Green Belt Study

Figure 5.1b: Green Belt Purpose 1 -
Checking the Unrestricted Sprawl of
Large Built-Up Areas - South
Staffordshire South

- South Staffordshire (South)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 1 rating
 - Strong
 - Moderate
 - Weak / No contribution

Assessment of Contribution to Green Belt Purpose 2

- 5.16 Green Belt Purpose 2 seeks to prevent neighbouring towns from merging into one another.
- 5.17 Only 1.5km separate Bloxwich from Landywood, at the southern end of Great Wyrley. Inset development on Long Lane and the A34 Walsall Road, and washed over but urbanising development along the A34 near Bloxwich, reduce perceived separation. There are no significant separating physical features and the A34 and railway provide direct transport links. This gap between towns is therefore considered fragile, and no land within it is sufficiently urbanised to make less than a strong contribution to Purpose 2. Land peripheral to the core gap makes a *moderate* contribution.
- 5.18 There is a wider gap between Great Wyrley and Wolverhampton, but inset development at Brinsford, Featherstone, Hilton Main Industrial Estate and Shareshill reduces perceived separation. Contribution of these areas is *moderate*. Similarly, inset development at Essington and Springhill reduces perceived separation between Great Wyrley and Wednesfield.
- 5.19 Although Great Wyrley and Cannock are close enough to be considered to constitute a single large built-up area there is clear distinction between settlements; however the M6 Toll and associated tree planting form the key element in this narrow gap, rather than remaining open land. Where the gap to M6 is wider, there is no visual separation between the settlements (tall commercial buildings to the north are prominent), so the remaining open land plays a limited role. Land in this area therefore makes a *moderate* or *weak* contribution.
- 5.20 Great Wyrley and Brownhills are a little under 5km apart along the A5, but the inset Brownhills West lies close to the edge of Brownhills, reducing open countryside separation. To the north of the M6 Toll, the large inset village of Norton Canes occupies much of the gap between Brownhills and Cannock, but the motorway, which is visually contained, creates separation that limits the visual impact of this on the gap between towns. Land in South Staffordshire to the east of Great Wyrley forms part of this gap, and makes a *moderate* contribution.
- 5.21 To the north west of the conurbation, Cannock and Stafford are some 7km apart, separated by open countryside with few urbanising influences. This is considered to be a relatively strong gap so Green Belt land makes a *weak* contribution to this purpose. The gap to the west between the conurbation and the Shropshire town of Bridgnorth is large, and the presence of intervening inset villages (Wombourne and Kinver) doesn't strengthen the contribution of open land, but the gap between Codsall and Albrighton is small enough for land in between to be considered to make a *moderate* contribution to preserving their separation.
- 5.22 To the west of the conurbation, there is a smaller gap between Wolverhampton and Dudley to the east of Wombourne, where land makes a *moderate* contribution to the separation of Wolverhampton and Dudley. In addition, the land directly adjoining the two settlements forms part of the narrow gap between them, and makes a *strong* contribution to preserving their separation.
- 5.23 To the south-west of the conurbation there is also a smaller gap between Stourbridge and Kidderminster, and the presence of intervening inset villages (Cookley, Kinver, Dunsley, Stourton, Blakedown and West Hagley) does diminish separation and therefore strengthen the contribution of open land to *moderate*.



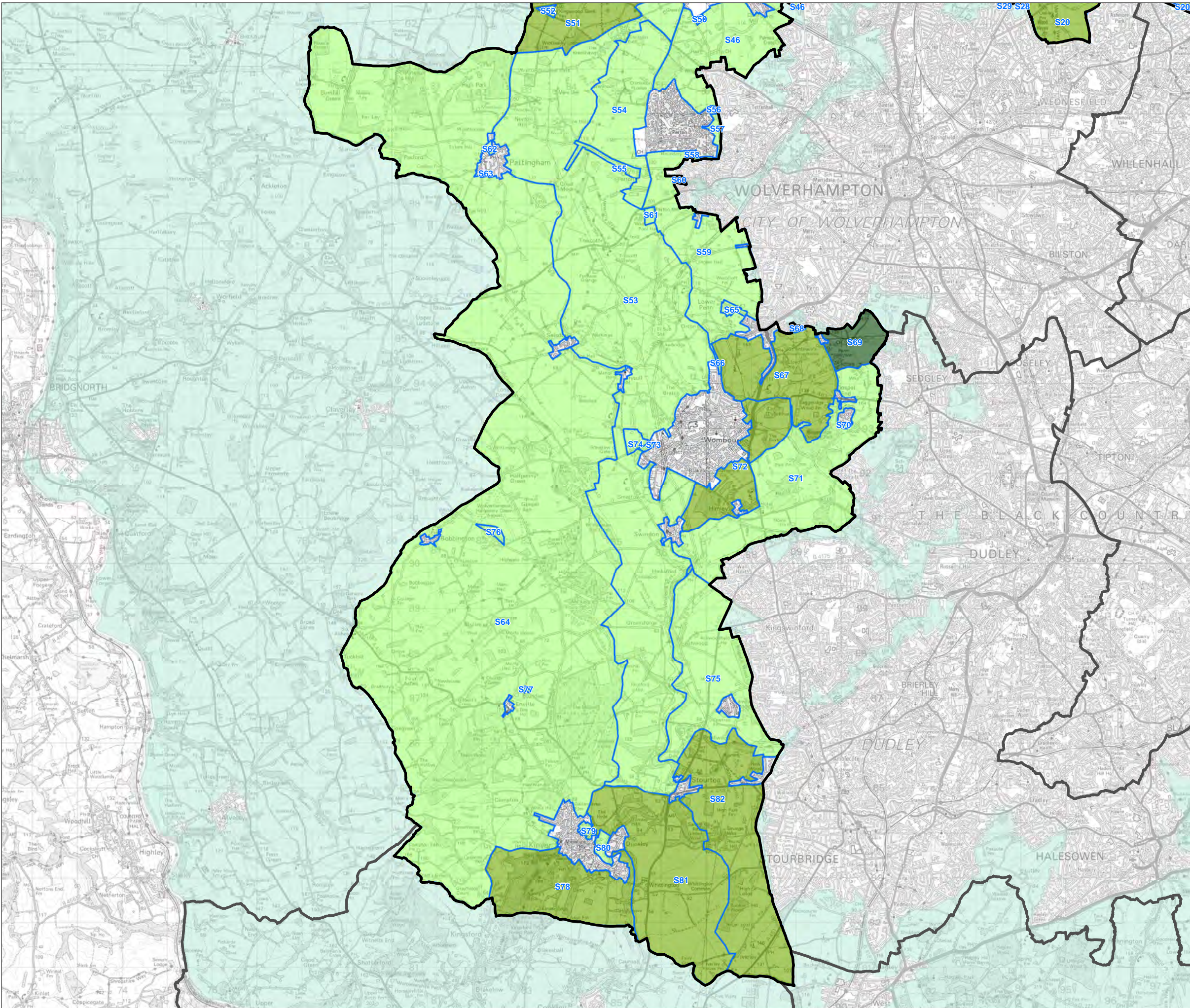
South Staffordshire Green Belt Study

Figure 5.2a: Green Belt Purpose 2 -
Preventing the Merging of
Neighbouring Towns - South
Staffordshire North

- South Staffordshire (North)
 - Other Local Authority
 - Green Belt outside project area
 - Stage 1 parcel
- Purpose 2 rating
- Strong
 - Moderate
 - Weak / No contribution

0 2 km





South Staffordshire Green Belt Study

Figure 5.2b: Green Belt Purpose 2 -
Preventing the Merging of
Neighbouring Towns - South
Staffordshire South

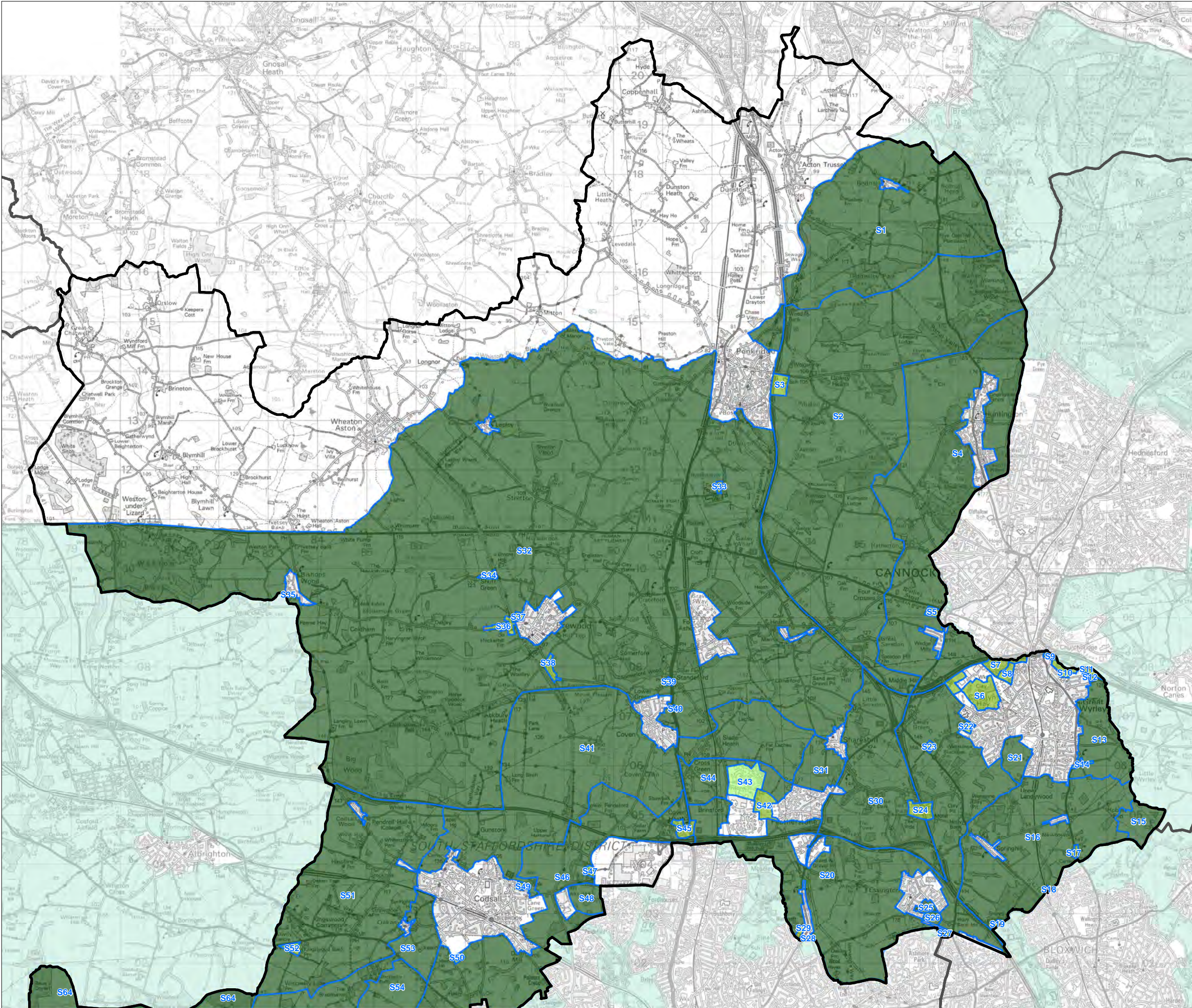
- South Staffordshire (South)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 2 rating
 - Strong
 - Moderate
 - Weak / No contribution

0 2.5 km



Assessment of Contribution to Green Belt Purpose 3

- 5.24 Green Belt Purpose 3 seeks to assist in safeguarding the countryside from encroachment.
- 5.25 The vast majority of land in South Staffordshire makes a *strong* contribution to preventing encroachment on the countryside. Other than isolated countryside locations where development has reduced openness, only small areas on the fringes of Great Wyrley / Cheslyn Hay and Wolverhampton and adjacent to the main inset villages (e.g. Wombourne, Featherstone, Kinver and Pattingham) are considered (due to loss of openness or containment by urbanising influences) to make a weaker contribution. Land between Perton and Tettenhall is considered to be too narrow and too contained by urban development to retain any significant openness or relationship with the wider countryside.



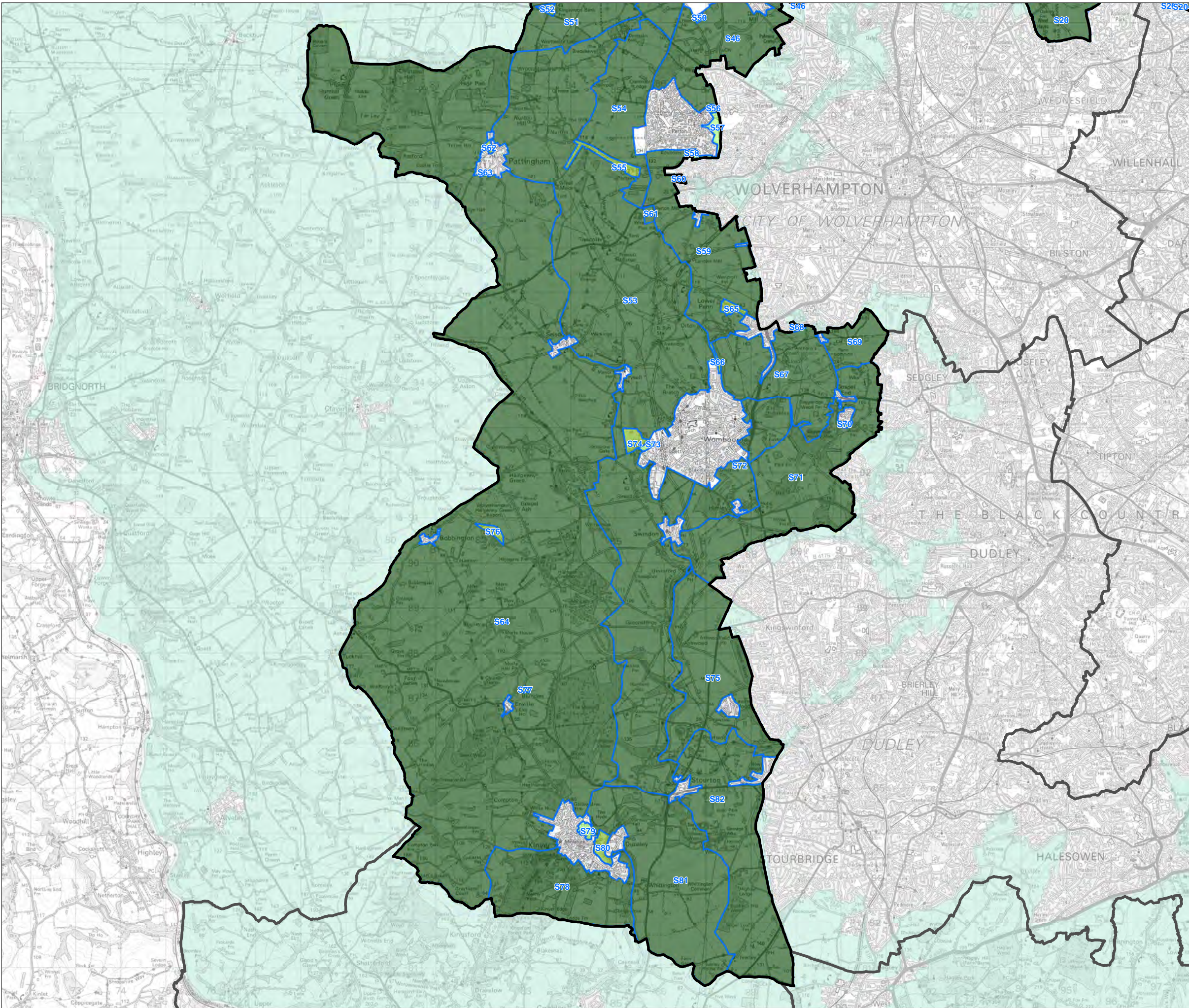
South Staffordshire Green Belt Study

Figure 5.3a: Green Belt Purpose 3 -
Safeguarding the Countryside from
Encroachment - South Staffordshire
North

- South Staffordshire (North)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 3 rating
 - Strong
 - Moderate
 - Weak / No contribution

0 2 km





South Staffordshire Green Belt Study

Figure 5.3b: Green Belt Purpose 3 -
Safeguarding the Countryside from
Encroachment - South Staffordshire
South

- South Staffordshire (South)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 3 rating
 - Strong
 - Moderate
 - Weak / No contribution

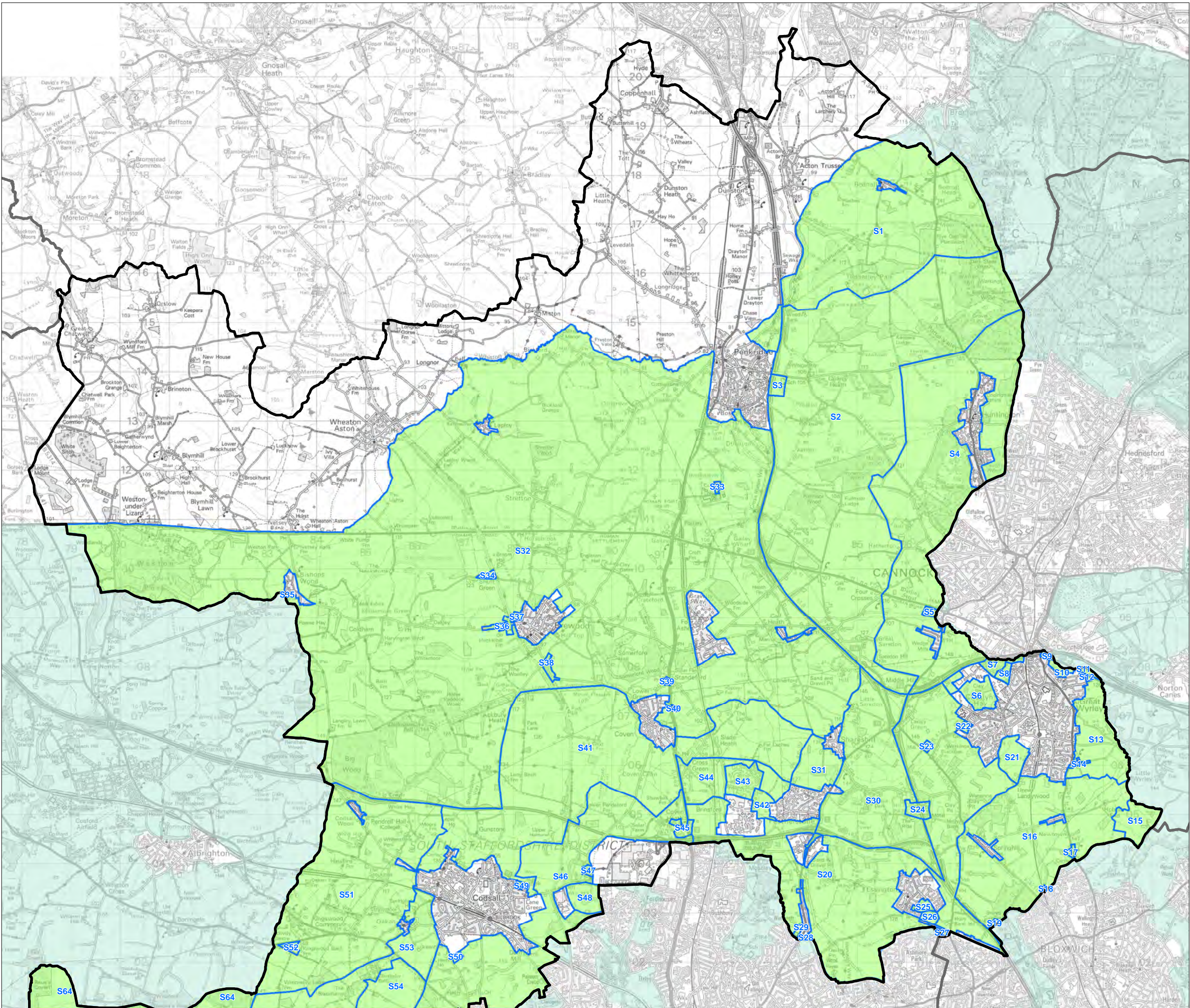
Assessment of Contribution to Green Belt Purpose 4

- 5.26 Purpose 4 of the NPPF Green Belt purposes seeks to preserve the setting and special character of historic towns. As set out in Section 3, analysis as part of this study has determined that no Green Belt land in South Staffordshire makes a contribution to the setting or special character of a historic town.

South Staffordshire
Green Belt Study

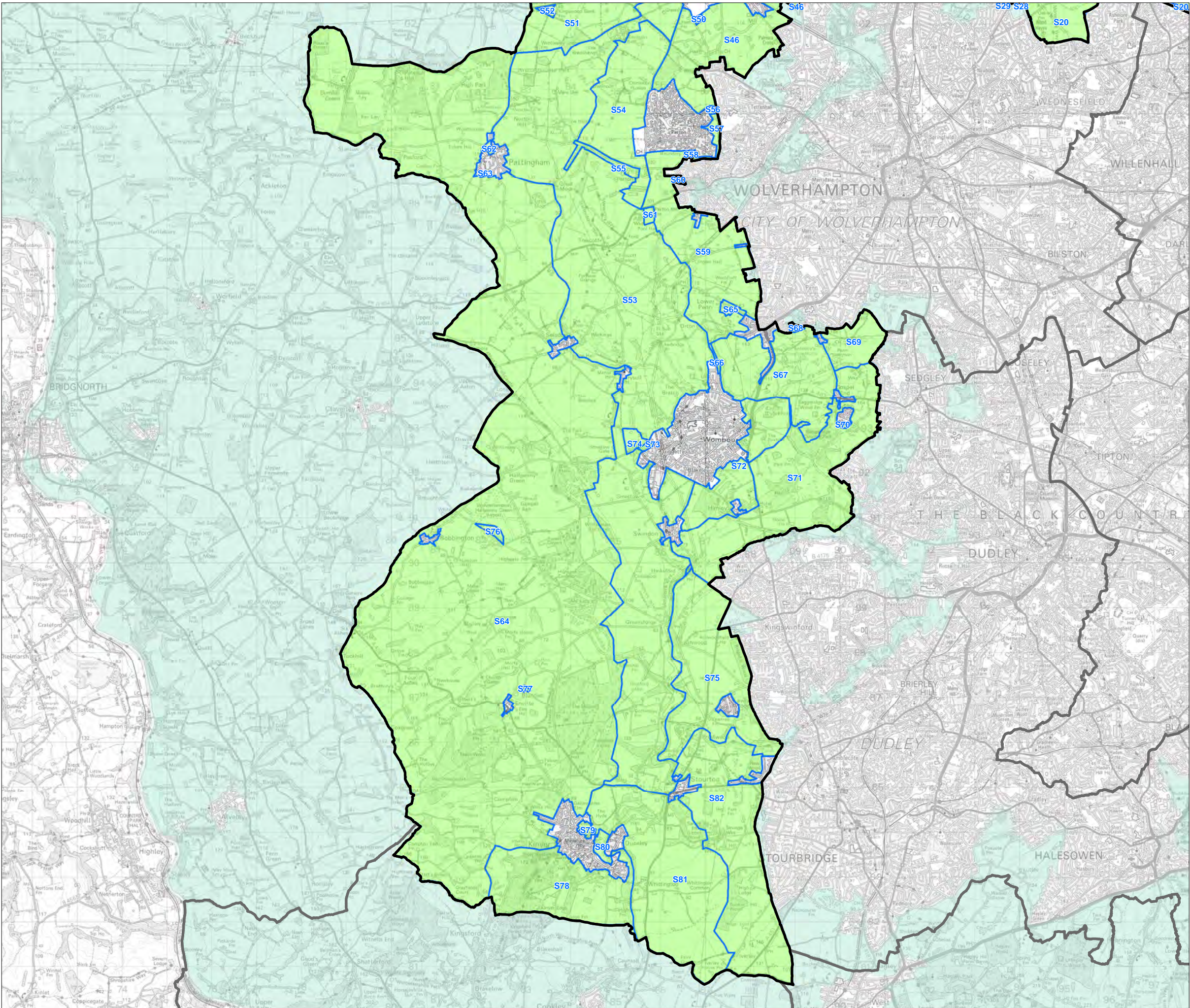
Figure 5.4a: Green Belt Purpose 4 -
Preserve the Setting and Special
Character of Historic Towns - South
Staffordshire North

- South Staffordshire (North)
Other Local Authority
Green Belt outside project area
Stage 1 parcel
Purpose 4 rating
Weak / No contribution



0 2 km





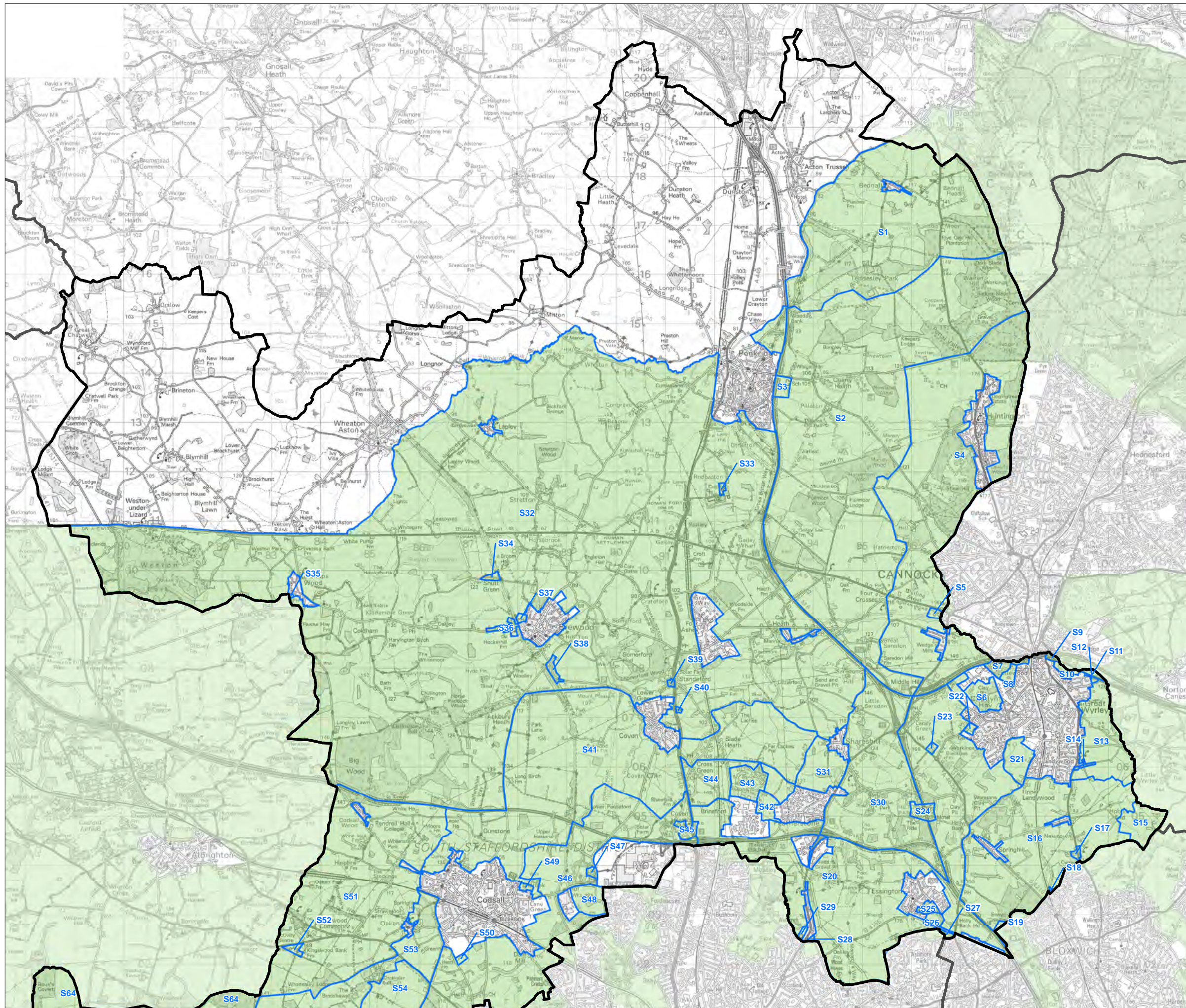
South Staffordshire Green Belt Study

Figure 5.4b: Green Belt Purpose 4 -
Preserve the Setting and Special
Character of Historic Towns - South
Staffordshire South

- South Staffordshire (South)
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 4 rating
- Weak / No contribution

0 2.5 km





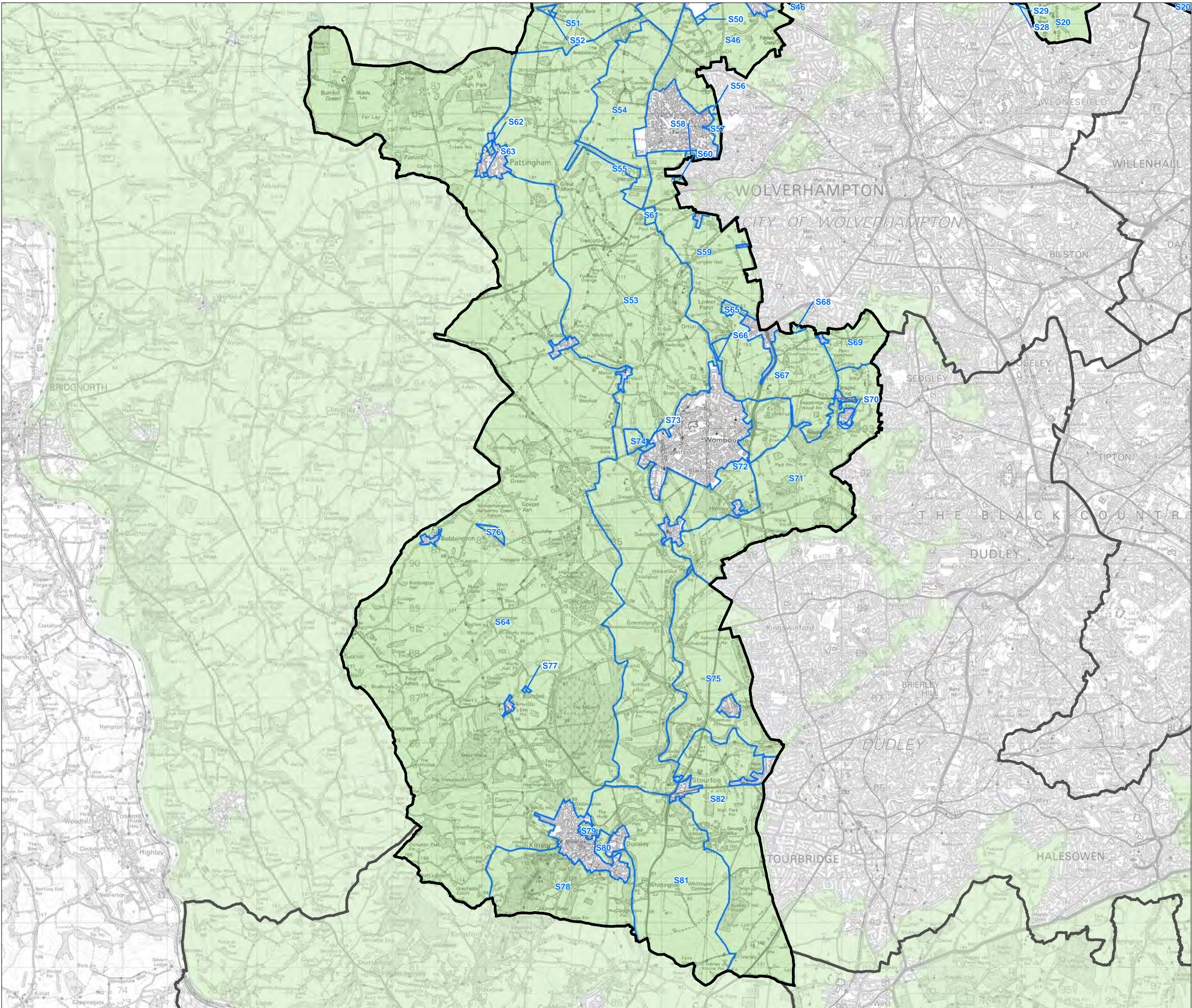
South Staffordshire Green Belt Study

Figure 5.5a: Stage 1 Parcels - South
Staffordshire North

- South Staffordshire (North)
- Other Local Authority
- Green Belt
- Stage 1 parcel

0 2 km





South Staffordshire Green Belt Study

Figure 5.5b: Stage 1 Parcels - South
Staffordshire South

- South Staffordshire (South)
- Other Local Authority
- Green Belt
- Stage 1 parcel

0 2.5 km



Part C: Stage 2 Methodology and Findings



6 Stage 2 Methodology

Introduction

- 6.1 This chapter sets out the methodology for the Stage 2 Green Belt assessment. The primary aim of the Stage 2 assessment was to identify the 'potential harm' of releasing land from the Green Belt.

Identification of assessment areas for Stage 2 assessment

- 6.2 In discussion with the Council, the assessment area for Stage 2 incorporated:
- Land within South Staffordshire adjacent to selected inset settlements, adjacent to settlements abutting the Green Belt's outer edge, or adjacent to inset development in any of the Black Country districts.
 - Promoted development sites identified by the Council identified in their Strategic Housing and Economic Land Availability Assessment (SHELAA), either as extensions to existing settlements or as new settlement options. SHELAA sites were included in the Green Belt review where they were identified as 'potentially suitable' sites for urban extensions or new settlements, or where they could be considered as a 'potentially suitable' site for the expansion of a Tier 1-4 settlement (as identified in the Rural Services and Facilities Audit 2018). This was informed by the most up-to-date 'call for sites' submissions available at the time of this assessment.
- 6.3 The promoted sites provided in this report are for information only, and may not be comprehensive as new sites may emerge following publication. It should be noted that there are some cross-boundary promoted sites which may have been submitted through Black Country and / or South Staffordshire 'call for sites' exercise. A comprehensive and up-to-date map and list of 'call for sites' can be found at: <https://blackcountrycorestrategy.dudley.gov.uk/t5/> and <https://www.sstaffs.gov.uk/planning/shlaa-5-year-supply.cfm>.
- 6.4 Land was assessed at Stage 2 as 'sub-parcels', and where Stage 1 parcels occupied a large area, which abutted more than one inset settlement edge, they were split into multiple sub-parcels at Stage 2.
- 6.5 Land which is constrained by absolute constraints was excluded from the assessment area for Stage 2. All of the areas identified for consideration at Stage 2 were overlaid with a set of 'absolute' environmental constraints – i.e. areas within which the Council would currently not permit development⁴⁷, these were identified as:
- Cultural Heritage:
 - Scheduled Monuments (SMs).
 - Registered Parks and Gardens.
 - Natural Heritage:
 - Special Areas of Conservation (SACs).
 - Sites of Special Scientific Interest.
 - National Nature Reserve.
 - Local Nature Reserves.
 - Sites of Importance for Nature Conservation (SINC) / Sites of Biological Importance (SBI).
 - Ancient Woodland.

⁴⁷ Whilst it is not envisaged that absolute constraints would be developed upon, absolute constraints might be included as part of wider development sites in the future if, for example, this would ensure that a nature conservation site could have its future management ensured.

- Other constraints:
 - Common Land.
 - Flood Zone 3 Areas.
 - Burial Ground.

- 6.6 Defined sub-parcels excluded these areas of constraint where practical. The shape of areas of constraint, and of unconstrained areas around, did in some instances make it simpler to define sub-parcels that do include constrained areas, but in all instances the Stage 2 harm assessment disregarded these on the basis that, whether or not defined as Green Belt, they would not be developed. Stage 1 parcels that were identified as being wholly constrained, or so highly constrained by absolute constraints that it was not considered that they could provide potential sites for development, were excluded from the Stage 2 assessment of sub-parcels. Additional constraints, such as landscape sensitivity (as set out in the Stage 3 report) and the assessment of Green Belt harm (as set out in this report), will be considered as part of the wider evidence base⁴⁸ that will together inform site selection and the potential 'exceptional circumstances' to justify release of the land from the Green Belt.
- 6.7 The assessment parcels did not cover areas beyond South Staffordshire, even if there were no clearly defined boundaries on the ground. In some cases, the commentaries on individual parcels have offered comments as to whether features on the ground might provide possible boundaries in future, but this Study does not provide an assessment of the contribution to Green Belt Purposes or a basis to consider the harm of releasing land in neighbouring districts. The assessments did, however, consider all relevant factors such as the presence of towns and physical features beyond the study boundary, where relevant to the analysis.

Links between Stage 1 and Stage 2 assessment

- 6.8 The Stage 1 analysis of variations in contribution to the Green Belt purposes is a key component of the Stage 2 assessment.
- 6.9 Where a potential development site spans more than one Stage 1 parcel it was subdivided accordingly, as the harm that would result from the release of each part of the site will potentially vary in line with the differing contribution of each part of the site to Green Belt purposes.
- 6.10 Conversely, where a number of potential development sites fall within the same Stage 1 parcel, these were grouped and assessed together within sub-parcels, as the harm that would result from the release of each part of the site will potentially be consistent.

Stage 2 Assessment Process

- 6.11 The Stage 2 assessment analysed each sub-parcel identified through the process outlined below.
- Step 1: Considered contribution ratings in more depth.
 - Step 2: Assessed potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessed overall Green Belt harm.
 - Step 4: Considered harm resulting from alternative Green Belt release 'scenarios'.
- 6.12 These steps are explained in further detail below.
- 6.13 Site visits were made to verify in the field the initial findings from the desktop analysis.

⁴⁸ This wider evidence base could include evidence on topics such as open space and land for infrastructure.

Criteria for Assessment of Harm resulting from Green Belt Release

Step 1: Consider contribution ratings in more depth

- 6.14 Noting that the Stage 1 assessment used a three-point rating scale for contribution (strong, moderate or weak/no contribution), a finer grain of analysis was added by considering whether contribution to any of the purposes is particularly significant – e.g. where there is a particularly strong distinction between settlement and countryside, or a very fragile gap between towns – and whether the combination of contribution to different purposes makes the site more important in Green Belt terms.
- 6.15 Land that only makes a strong contribution to one purpose may result in high harm should it be released; however there is more potential for harm to be lower in this circumstance – if the impact on the integrity of the wider Green Belt is not significant – than is the case where there is a strong contribution to more than one purpose. Consideration was also given as to whether in some instances a moderate contribution across a number of Green Belt purposes might result in a higher level of harm.

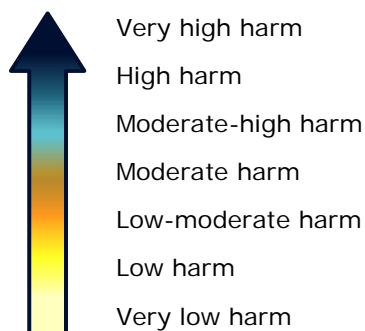
Step 2: Assess potential impact of release on the integrity of the remaining Green Belt

- 6.16 The assessment of contribution at Stage 1 already considers the relationship between a parcel and adjacent Green Belt land, but at the sub-parcel level it is possible to address how the loss of a specific area of land will affect Green Belt boundaries and the strength/ integrity of the adjacent Green Belt.
- 6.17 If Green Belt release significantly weakens the contribution of the adjacent Green Belt to the Green Belt purposes, then the harm is likely to be greater than that identified in Step 1. However, if there is no or limited impact on the contribution of the adjacent Green Belt, then the harm is likely to be less.
- 6.18 If the new Green Belt boundary results in a longer, more varied edge, or creates a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the wider Green Belt, but even if a strong alternative boundary can be defined, there is potential for the remaining Green Belt to be weaker – e.g. where a narrow strip of Green Belt remains between settlements or at the Green Belt fringe. Harm is lowest where release would have no adverse impact on the adjacent Green Belt and the boundary would be strengthened, either through creation of a shorter/simpler boundary, or through use of a feature that marks a stronger or more widely consistent distinction between an urban area and countryside.
- 6.19 With respect to purposes 1, 3 the assessment considered the harm to adjacent Green Belt by assessing whether the contribution made by that land would be weakened as a result of release of the parcel/site under assessment. For Purpose 2, it is the robustness of the gap that would remain after release that was the key consideration, rather than impact on the contribution of the adjacent Green Belt, as the latter will increase as the gap becomes more fragile.
- 6.20 The considerations that were taken into account when assessing the impact of release on the strength of adjacent Green Belt included:
- **Purpose 1:** Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?
 - **Purpose 2:** How strong would the remaining settlement gap be if the Green Belt land were released? In order to answer this question consideration must be given to the size of the gap, the role of constraints and the location of separating and connecting features.
 - **Purpose 3:** Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside? Unless detailed development proposals are being considered the urbanising influence of future development is difficult to judge, so it is assumed that land beyond a new boundary that currently makes a significant contribution to Purpose 3 will continue to make a significant contribution to Purpose 3.

- 6.21 The assessment considered the harm resulting from extending the nearest area(s) inset from the Green Belt, other than in cases where sub-parcels had been defined to encompass potential development sites promoted as new settlements, although in a few instances both options were assessed. Where sub-parcels being assessed as settlement extensions were not adjacent to an inset settlement, this means that the assessment of harm considered the 'cumulative' harm of release of the sub-parcel in question together with land between this and the inset edge.

Step 3: Assess overall Green Belt harm

- 6.22 Green Belt harm was rated using a seven point scale ranging from very high to very low harm.

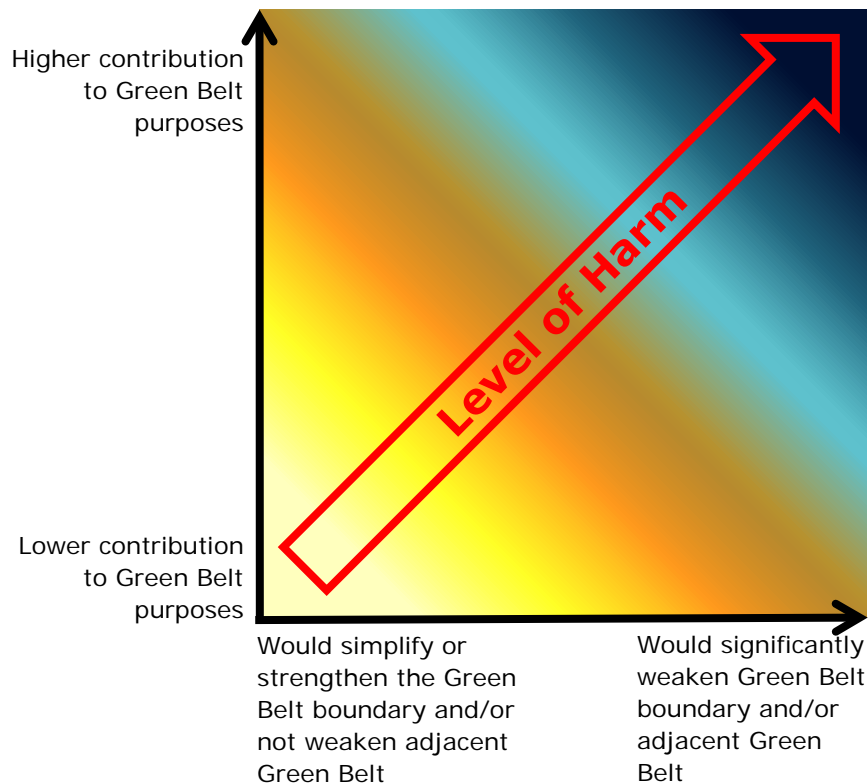


- 6.23 **Figure 6.1** provides an indication as to how the contribution to the Green Belt and the impact on adjacent Green Belt and the strength of the boundary influence the overall harm of Green Belt release. However, **professional judgement** was required in each individual case to consider how much weight to attach to each contributing element. For example:

- Where land makes a strong contribution to multiple Green Belt purposes, or a very strong contribution to a single purpose, and where its release would weaken the adjacent Green Belt (for example by leaving a narrow gap between towns), harm is likely to be **very high**.
- Where land makes a strong contribution to one of the Green Belt purposes, and where its release would partially weaken adjacent Green Belt (for example by increasing its containment by urban areas), harm is likely to be **high**.
- Where land makes a moderate contribution to one of the Green Belt purposes and a weak contribution to the others, but where its release would significantly weaken the adjacent Green Belt (for example by isolating an area of Green Belt that makes a stronger contribution), harm is likely to be **moderate-high**.
- Where land makes a relatively strong contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt, harm is likely to be **low-moderate**.
- Where land makes a relatively weak contribution to two of the Green Belt purposes and a weak contribution to the others, but where its release would partially weaken the adjacent Green Belt (for example by increasing containment of adjacent open land, or by creating a less consistent boundary line), harm is likely to be **moderate**.
- Where land makes a relatively strong contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt, harm is likely to be **low-moderate**.
- Where land makes a relatively weak contribution to one of the Green Belt purposes and a weak contribution to the others, and its release would not weaken the Green Belt boundary or the integrity of adjacent Green Belt land, harm is likely to be **low**.
- Where land makes a weak contribution to all Green Belt purposes, and its release would not weaken the integrity of adjacent Green Belt land, or would create a more consistent boundary better reflecting the distinction between urban settlement and countryside, harm is likely to be **very low**.

- 6.24 Clear and detailed justification is provided for all ratings (see **Appendix 3**) in relation to how the overall judgement of Green Belt harm was reached.

Figure 6.1: Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact of release on adjacent Green Belt



Step 4: Consider harm resulting from alternative release 'scenarios'

- 6.25 The assessors first considered the parcel/sub-parcel as a whole, to identify which area(s) within the sub-parcel would result in the highest harm if released. The assessment assumed that land would be released out from an inset settlement edge, so typically harm will increase with distance from that boundary (if it is not already judged to be *high* immediately beyond the settlement edge).
- 6.26 Separate release scenarios were also mapped in cases where both settlement extension and the creation of a new inset area are relevant options, and where the harm resulting from one type of scenario would be less than the harm resulting from the other.
- 6.27 Consideration was then given as to whether the release of a smaller part or parts of the area would result in less harm to Green Belt purposes. Where this is the case, separate release scenarios were mapped, with separate ratings given for each lower level of harm identified, supported by text setting out the reason(s) for the reduced level of Green Belt harm.

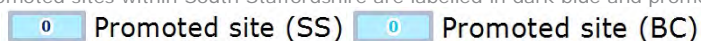
Stage 2 Assessment Outputs

- 6.28 For each assessment sub-parcel, a Stage 2 assessment of harm was produced (see **Appendix 3**). This included the following information:
- Assessment area reference, size and brief description.
 - The Stage 1 contribution ratings relevant applicable to the assessment area, with supporting text.

- 1:25,000 scale Ordnance Survey map showing parcel/site and surrounding context, with absolute development constraints and any nearby assessment parcels/sites⁴⁹.
- An aerial view of the mapped area.
- A photograph of the assessment area⁵⁰.
- Text setting out the analysis of harm that would result from release of the whole assessment area, together with a harm rating.
- Harm analysis and rating for any alternative release scenarios identified for the assessment area, where potential harm could be reduced by release of a smaller area of land.

6.29 Without a clear and consistent definition of the scale, type and design of development which will come forward for development within a specific Green Belt location, the harm assessment was based on the assumption that the openness (in Green Belt terms) of a defined area will be lost. This approach ensured a consistent and proportionate approach was adopted across the study area.

⁴⁹ Promoted sites within South Staffordshire are labelled in dark blue and promoted sites within the Black Country are labelled in light blue.



⁵⁰ These photographs are illustrative and cannot be taken as representative of sub-parcels as a whole.

7 Stage 2 Findings

Introduction

- 7.1 This chapter sets out the findings of the assessment of Green Belt harm (as outlined in **Chapter 6**).
- 7.2 As outlined in **Chapter 6**, the assessment of harm included the following steps:
- Step 1: Consideration of contribution ratings in more depth.
 - Step 2: Assessment potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessment overall Green Belt harm.
 - Step 4: Consideration of harm resulting from alternative Green Belt release 'scenarios'.
- 7.3 Where there were variations in the three factors influencing Green Belt harm across sub-parcel, different harm scenarios were identified to reflect any variations in harm. This took into account the fact that harm may vary if development is constrained to a smaller more contained area within the sub-parcel as a whole, or harm may differ if sub-parcels are released as extensions of existing inset settlements, or as new inset areas.
- 7.4 The findings for the assessment of harm, together with the Stage 1 contribution to Green Belt purposes, are presented in **Appendix 3** on a sub-parcel by sub-parcel basis. Ratings and commentary are provided for each release scenario considered.

Summary of findings

- 7.5 The detailed findings of the assessment of harm are included in **Appendix 3** and are summarised by sub-parcel in **Table 7.1** and by site **Table 7.2** below. **Figure 7.1 (a-b)** show the sub-parcels within South Staffordshire, and **Figure 7.2 (a-b)** the absolute constraints to development. **Figure 7.3 (a-b)** show the potential degree of harm that would result if the sub-parcel scenarios were released. **Table 7.3** summarises the amount of land identified (in hectares and percentages) for each level of harm (i.e. very low to very high).
- 7.6 Where sub-parcels are assessed as having lower harm to the Green Belt if they were to be removed, this does not necessarily mean that those areas should be released. Any release of Green Belt land requires consideration of the 'exceptional circumstances' justifying its release. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that can justify release of the land from the Green Belt. Other factors, such as the sustainability and the ability to meet development needs outside of the Green Belt also need to be taken into consideration. This is explained further below.

Table 7.1: Green Belt assessment of harm ratings: by sub-parcel

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S1As1	16.1	Moderate
S1As2	6.8	Moderate - High
S1Bs1	41.7	Moderate - High
S2As1	78.1	High
S2Bs1	16.4	High
S3As1	12.8	Moderate - High
S4As1	86.0	Very High
S4Bs1	180.3	High
S4Cs1	64.6	Very High
S4Cs2	11.1	High
S4Cs3	2.5	Moderate - High
S4Ds1	78.8	Very High
S4Ds2	64.3	High
S5As1	4.3	Low - Moderate
S6As1	44.4	Low - Moderate
S7As1	2.8	Moderate
S8As1	8.0	Low - Moderate
S10As1	0.6	Moderate
S10As2	2.0	Low - Moderate
S11As1	4.4	Moderate
S12As1	2.0	Low
S13As1	28.2	High
S13Bs1	87.5	High
S13Bs2	25.5	Moderate
S14As1	2.1	Very Low
S15As1	53.0	Very High
S16As1	72.0	Very High
S16Bs1	15.6	High
S16Cs1	91.8	Very High
S16Ds1	77.0	Very High
S16Ds2	8.7	High
S16Ds3	3.8	Moderate - High
S17As1	3.6	Moderate
S18As1	0.6	Moderate
S19As1	3.8	Moderate - High
S20As1	31.0	High
S20Bs1	15.9	Moderate - High
S20Cs1	131.1	High
S20Ds1	56.5	Very High
S20Es1	96.5	Very High
S20Es2	77.7	High
S20Es3	16.2	Moderate - High
S20Fs1	240.2	High
S20Gs1	35.4	Moderate
S20Hs1	69.5	Moderate - High
S21As1	39.9	Moderate
S22As1	3.8	Low
S25As1	7.7	Moderate
S26As1	7.8	Moderate - High
S27As1	2.5	Low
S28As1	1.2	Low - Moderate

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S29As1	2.9	Low - Moderate
S30As1	21.3	Moderate - High
S30Bs1	30.3	High
S30Cs1	115.5	High
S30Cs2	9.7	Moderate - High
S30Cs3	3.4	Moderate
S31As1	49.1	High
S31As2	55.3	Moderate - High
S32As1	110.9	Moderate - High
S32As2	0.7	Moderate
S32Bs1	71.9	Moderate - High
S32Cs1	10.9	High
S32Cs2	23.7	Moderate
S32Ds1	13.8	Moderate - High
S32Ds2	1.0	Moderate
S32Es1	225.9	High
S32Es2	347.2	Moderate - High
S32Fs1	171.7	High
S32Fs2	54.0	Moderate - High
S32Fs3	5.2	Low - Moderate
S32Gs1	25.2	High
S32Hs1	106.8	High
S32Is1	68.5	High
S32Js1	22.9	High
S32Js2	7.7	Moderate - High
S32Js3	8.0	Moderate
S32Ks1	26.5	Moderate - High
S32Ls1	61.4	Moderate - High
S32Ls2	2.7	Moderate
S32Ms1	12.5	Low - Moderate
S33As1	2.8	High
S35As1	0.6	Very Low
S36As1	2.8	Moderate
S36As2	6.8	Low - Moderate
S37As1	3.3	Low - Moderate
S38As1	6.6	Moderate - High
S40As1	1.2	Moderate - High
S41As1	35.3	High
S41As2	52.8	Moderate - High
S41As3	10.8	Moderate
S41Bs1	126.5	High
S41Bs2	3.8	Moderate - High
S41Cs1	5.8	Moderate - High
S42As1	20.0	Moderate
S43As1	14.5	Low - Moderate
S43As2	29.4	Very Low
S44As1	64.3	High
S44As2	12.0	Moderate - High
S45As1	10.6	Moderate
S46As1	63.3	Moderate - High
S46Bs1	251.5	High
S46Bs2	13.9	Moderate - High
S46Cs1	144.9	Very High

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S46Cs2	58.4	High
S46Ds1	62.1	Very High
S46Es1	62.9	Very High
S46Fs1	18.7	Very High
S46Gs1	2.5	Moderate - High
S47As1	4.0	Moderate
S48As1	33.0	High
S49As1	3.6	Low - Moderate
S50As1	2.9	Moderate
S51As1	72.7	High
S51Bs1	13.5	High
S51Bs2	29.9	Moderate - High
S53As1	27.6	High
S53As2	10.9	High
S53As3	6.2	Moderate
S53Bs1	117.0	Moderate - High
S53Bs2	3.2	Low - Moderate
S53Cs1	61.9	Moderate - High
S53Cs2	98.8	Moderate
S53Cs3	3.8	Low - Moderate
S53Ds1	39.6	Moderate - High
S53Ds2	17.3	Moderate
S53Ds3	1.5	Low - Moderate
S53Es1	25.2	Moderate - High
S53Fs1	68.2	Moderate - High
S53Fs2	0.2	Moderate
S53Gs1	106.5	High
S53Hs1	45.5	High
S53Hs2	14.4	Moderate - High
S53Hs3	4.1	Moderate
S54As1	13.2	High
S54Bs1	200.8	Very High
S54Bs2	132.6	High
S55As1	26.1	Moderate - High
S56As1	3.4	Low - Moderate
S57As1	19.7	Low
S58As1	3.7	Low - Moderate
S59As1	12.5	Moderate
S59Bs1	102.3	High
S59Bs2	14.5	Moderate - High
S59Cs1	93.7	High
S59Cs2	21.1	Moderate - High
S59Ds1	31.0	Moderate - High
S60As1	3.7	Low
S62As1	3.6	Low
S63As1	0.8	Very Low
S64As1	74.0	Moderate - High
S64As2	13.8	Moderate
S64As3	0.7	Low - Moderate
S64Bs1	13.8	Moderate - High
S64Cs1	6.1	Moderate
S64Cs2	5.8	Low - Moderate
S64Ds1	24.1	Moderate - High

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S64Ds2	28.9	Moderate
S64Ds3	2.1	Low - Moderate
S64Es1	53.6	Moderate - High
S64Es2	4.6	Moderate
S64Fs1	82.5	Moderate - High
S64Gs1	82.0	Moderate - High
S64Gs2	34.6	Moderate
S65As1	11.6	Moderate
S66As1	3.9	Moderate
S67As1	370.5	Very High
S68As1	4.4	Moderate
S69As1	76.0	Very High
S70As1	2.4	Low
S71As1	112.6	Very High
S71As2	37.2	High
S71Bs1	109.6	Very High
S71Bs2	27.7	Moderate - High
S71Cs1	125.4	Very High
S71Cs2	16.4	Moderate - High
S72As1	90.8	Moderate - High
S72As2	30.1	Moderate
S72Bs1	89.0	High
S72Bs2	9.9	Moderate - High
S72Bs3	11.6	Low - Moderate
S73As1	3.7	Very Low
S74As1	18.9	Low - Moderate
S75As1	94.7	High
S75Bs1	167.6	Very High
S76As1	10.1	Moderate
S78As1	60.8	High
S78As2	5.0	Moderate - High
S78As3	3.1	Moderate
S79As1	10.0	Very Low
S80As1	6.7	Low - Moderate
S81As1	40.1	High
S81As2	33.2	Moderate - High
S81As3	13.8	Moderate
S82As1	50.9	Very High
S82Bs1	335.4	Very High
S82Bs2	10.5	Moderate - High
S82Bs3	5.6	Moderate
S82Cs1	28.4	Very High
S82Cs2	105.6	High

Assessment of harm for Promoted Sites

- 7.7 The findings of the assessment of harm were overlaid with the identified boundaries of the promoted sites. This includes a small number of sites submitted to the Black Country call for sites that partly fall within South Staffordshire. The results are set out in **Table 7.2**. This summarises the degree of harm that would result from the release of the identified sites. In some cases the degree of harm varies within a site and in these circumstances, the variations are identified and rated separately. **Table 7.4** summarise the amount of land within promoted sites identified (in hectares and percentages) for each level of harm (i.e. very low to very high), with and without absolute constraints being taken into account.

Table 7.2: Green Belt assessment of harm ratings: by site

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹	Harm Rating
Ref: 006 (Housing)	3.8	S32Fs3	3.8	Low - Moderate
Ref: 017 (Housing)	2.4	S4Bs1	2.4	High
Ref: 022 (Housing)	4.8	S4Bs1	4.8	High
Ref: 023 (Housing)	1.8	S1Bs1	1.7	Moderate - High
Ref: 024 (Housing)	1.1	S1Bs1	1.0	Moderate - High
Ref: 025 (Housing)	0.3	S1Bs1	0.2	Moderate - High
Ref: 026 (Housing)	0.8	S1Bs1	0.8	Moderate - High
Ref: 054 (Housing)	1.6	S32Ls1	1.6	Moderate - High
Ref: 062 (Housing)	1.0	S38As1	0.8	Moderate - High
Ref: 065 (Housing)	0.2	S36As2	0.1	Low - Moderate
		S32Bs1	0.2	Moderate - High
Ref: 067 (Housing)	5.2	S38As1	0.1	Moderate - High
		S32Ls1	5.1	Moderate - High
Ref: 074 (Housing)	2.3	S32Ks1	2.3	Moderate - High
Ref: 075 (Housing)	4.8	S32Ks1	4.7	Moderate - High
Ref: 075a (Housing)	0.5	S32Ks1	0.5	Moderate - High
Ref: 076 (Housing)	0.6	S32Ls2	0.6	Moderate
Ref: 076a (Housing)	0.4	S32Ls2	0.4	Moderate
Ref: 076b (Housing)	0.6	S32Ls2	0.6	Moderate
Ref: 076c (Housing)	0.7	S32Ls2	0.7	Moderate
Ref: 078 (Housing)	0.7	S32Ls1	0.7	Moderate - High
Ref: 079 (Housing)	2.1	S32Ks1	0.1	Moderate - High
		S36As1	1.9	Moderate
Ref: 082 (Housing)	5.5	S32Cs2	3.1	Moderate
Ref: 083 (Housing)	0.2	S32Ms1	0.2	Low - Moderate
Ref: 084 (Housing)	4.2	S41Bs2	2.5	Moderate - High
Ref: 085 (Housing)	9.2	S32Ms1	9.1	Low - Moderate
Ref: 087 (Housing)	0.7	S32Ms1	0.6	Low - Moderate
Ref: 087 (Housing)	0.7	S32Hs1	<0.1	High
Ref: 090 (Housing)	1.5	S32Gs1	0.1	High
Ref: 091 (Housing)	0.6	S32Gs1	0.1	High
Ref: 096 (Housing)	4.1	S32As1	4.1	Moderate - High
Ref: 097 (Housing)	5.1	S32As1	5.1	Moderate - High
Ref: 099 (Housing)	1.2	S32As2	0.5	Moderate
		S32As1	0.6	Moderate - High
Ref: 102 (Housing)	2.1	S45As1	0.4	Moderate
		S20Ds1	1.7	Very High
Ref: 106 (Housing) ⁺	86.1	S15As1	2.7	Very High
		S16Cs1	43.7	Very High
Ref: 116 (Housing)	22.8	S20Cs1	22.8	High
Ref: 119b (Housing)	3.0	S6As1	3.0	Low - Moderate
Ref: 120 (Housing)	0.5	S8As1	0.5	Low - Moderate
Ref: 130 (Housing)	0.1	S22As1	0.1	Low
Ref: 134 (Housing)	1.9	S13Bs2	1.7	Moderate
Ref: 136 (Housing)	18.6	S21As1	18.6	Moderate
Ref: 137 (Housing)	9.7	S20Bs1	9.4	Moderate - High
Ref: 138 (Housing)	2.8	S10As1	0.6	Moderate

⁵¹ All promoted site areas and calculations are indicative, dependent on Council data accuracy.

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹	Harm Rating
Ref: 150 (Housing)	5.7	S25As1	0.1	Moderate
		S26As1	5.6	Moderate - High
Ref: 151 (Housing)	6.3	S20Hs1	6.2	Moderate - High
Ref: 154 (Housing)	0.8	S20Fs1	0.8	High
Ref: 159a (Housing)	0.2	S20Fs1	0.2	High
Ref: 159b (Housing)	0.6	S20Fs1	0.5	High
Ref: 160 (Housing)	3.0	S20Hs1	3.0	Moderate - High
Ref: 163 (Housing)	12.2	S20Hs1	12.0	Moderate - High
Ref: 164 (Housing)	3.4	S20Hs1	3.3	Moderate - High
Ref: 164a (Housing)	0.5	S20Hs1	0.5	Moderate - High
Ref: 165 (Housing)	28.9	S20Hs1	28.6	Moderate - High
Ref: 166 (Housing)	1.1	S20Hs1	1.1	Moderate - High
Ref: 169 (Housing)	1.3	S31As2	1.3	Moderate - High
Ref: 170 (Housing)	17.1	S20Gs1	17.1	Moderate
Ref: 172 (Housing)	12.7	S30Cs1	12.7	High
Ref: 180 (Housing)	113.0	S69As1	49.9	Very High
Ref: 180 (Housing) ⁺	0.1	S31As2	0.1	Moderate - High
Ref: 181 (Housing)	0.4	S31As1	0.4	High
Ref: 182 (Housing)	0.1	S32Ds1	0.1	Moderate - High
Ref: 183 (Housing)	0.3	S31As2	0.3	Moderate - High
Ref: 184 (Housing)	2.2	S30Cs3	2.2	Moderate
Ref: 185 (Housing)	0.9	S30Cs3	0.9	Moderate
Ref: 192 (Housing) ⁺	2.8	S57As1	0.9	Low
		S58As1	1.3	Low - Moderate
Ref: 197 (Employment and housing) ⁺	100.1	S20Es1	21.6	Very High
		S20Es2	39.3	High
Ref: 200 (Housing)	32.3	S16As1	32.1	Very High
Ref: 202 (Housing)	36.6	S4Cs2	7.0	High
		S4Cs1	29.6	Very High
Ref: 203 (Housing)	5.4	S4Ds2	5.4	High
Ref: 204 (Housing)	0.4	S20Es1	0.4	Very High
Ref: 205 (Housing)	0.2	S20Es2	0.2	High
Ref: 206 (Housing)	0.4	S20Es2	0.4	High
Ref: 207 (Housing)	0.7	S18As1	0.6	Moderate
Ref: 210 (Housing)	1.0	S46Bs2	0.9	Moderate - High
Ref: 211 (Housing)	4.9	S41As1	0.1	High
		S41As3	3.3	Moderate
Ref: 217 (Housing)	24.8	S41As1	23.7	High
Ref: 218 (Housing)	55.8	S46Cs1	52.7	Very High
Ref: 221 (Housing)	2.5	S46Bs2	2.3	Moderate - High
Ref: 222 (Housing)	10.7	S41As2	10.5	Moderate - High
Ref: 224 (Housing)	3.4	S53Hs2	3.4	Moderate - High
Ref: 225 (Housing)	2.4	S51Bs2	2.4	Moderate - High
Ref: 230 (Housing)	3.6	S51Bs2	3.6	Moderate - High
Ref: 236 (Housing)	0.9	S46Bs2	0.9	Moderate - High
Ref: 237 (Housing)	0.8	S46Bs2	0.8	Moderate - High
Ref: 238a (Housing)	7.8	S59Ds1	7.8	Moderate - High
Ref: 238b (Housing)	6.7	S59Ds1	6.6	Moderate - High
Ref: 241 (Housing)	3.3	S46As1	3.2	Moderate - High
Ref: 243 (Housing)	1.4	S46As1	1.4	Moderate - High
Ref: 245 (Housing)	3.7	S59Cs1	0.1	High
Ref: 245 (Housing)	3.8	S75Bs1	0.1	Very High
Ref: 245 (Housing)	3.7	S60As1	3.6	Low
Ref: 246 (Housing)	364.4	S51As1	72.7	High
		S53Gs1	106.4	High
		S54Bs1	171.7	Very High
Ref: 246a (Housing)	9.0	S54Bs1	9.0	Very High
Ref: 249 (Housing)	3.6	S64Es1	3.6	Moderate - High
Ref: 250 (Housing)	3.7	S64Es1	3.7	Moderate - High
Ref: 251 (Housing)	3.2	S63As1	0.1	Very Low
		S64Es1	0.5	Moderate - High
		S64Es2	1.9	Moderate
Ref: 252 (Housing)	3.6	S64Es2	0.1	Moderate
		S64Es1	3.5	Moderate - High
Ref: 253 (Housing)	11.8	S53Fs2	0.2	Moderate

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹	Harm Rating
		S53Fs1	11.5	Moderate - High
Ref: 254 (Housing)	0.2	S53Fs1	0.1	Moderate - High
Ref: 255 (Housing)	2.4	S64Es1	0.1	Moderate - High
		S64Es2	2.3	Moderate
Ref: 257 (Housing)	3.4	S53Fs1	3.4	Moderate - High
Ref: 26 (Housing) ⁺	24.1	S71Bs1	0.6	Very High
		S71Bs2	6.0	Moderate - High
Ref: 260 (Housing)	7.9	S59Cs1	7.9	High
Ref: 264 (Housing)	4.6	S82Bs1	0.2	Very High
Ref: 271 (Housing)	4.0	S64Gs2	3.9	Moderate
Ref: 272 (Housing)	1.0	S81As3	1.0	Moderate
Ref: 273 (Housing)	4.0	S64Gs2	3.7	Moderate
Ref: 280 (Housing) ⁺	21.5	S82Cs2	17.5	High
Ref: 283 (Housing)	9.6	S72As1	2.9	Moderate - High
		S72As2	6.7	Moderate
Ref: 284 (Housing)	2.1	S72Bs3	1.9	Low - Moderate
Ref: 286 (Housing)	0.7	S72As2	0.6	Moderate
Ref: 298 (Housing)	1.9	S53Cs3	1.9	Low - Moderate
Ref: 306 (Housing)	1.8	S72Bs2	1.8	Moderate - High
Ref: 309 (Housing)	4.5	S53Bs1	4.4	Moderate - High
Ref: 310 (Housing)	16.2	S53Cs2	0.5	Moderate
		S74As1	13.9	Low - Moderate
Ref: 312a (Housing)	0.3	S53Bs1	0.2	Moderate - High
Ref: 313 (Housing)	1.4	S72As2	0.6	Moderate
Ref: 314 (Housing)	2.0	S53Bs1	2.0	Moderate - High
Ref: 315 (Housing)	2.0	S71As2	0.4	High
		S71As1	1.5	Very High
Ref: 319 (Housing)	4.0	S64As2	3.9	Moderate
Ref: 320 (Housing)	0.6	S64As2	0.6	Moderate
Ref: 321 (Housing)	1.0	S64As1	0.9	Moderate - High
Ref: 325 (Housing)	0.2	S53Ds2	0.2	Moderate
Ref: 327 (Housing)	0.6	S53Ds3	0.6	Low - Moderate
Ref: 328 (Housing)	0.5	S64Cs2	0.5	Low - Moderate
Ref: 329 (Housing)	1.1	S64Cs2	1.0	Low - Moderate
Ref: 330 (Housing)	0.2	S53Ds1	0.1	Moderate - High
Ref: 330 (Housing)	0.2	S53Ds1	0.1	Moderate - High
Ref: 330 (Housing)	0.2	S53Ds2	<0.1	Moderate - High
Ref: 335a (Housing)	1.2	S72As2	0.5	Moderate
Ref: 335b (Housing)	0.5	S72As2	0.5	Moderate
Ref: 338 (Housing)	0.4	S72As2	0.2	Moderate
Ref: 339 (Housing)	4.2	S71Cs1	4.2	Very High
Ref: 340 (Housing)	0.3	S71Cs1	0.3	Very High
Ref: 343 (Housing)	52.3	S75Bs1	28.3	Very High
Ref: 350a (Housing)	2.4	S59Cs1	2.4	High
Ref: 350b (Housing)	2.8	S59Cs1	2.8	High
Ref: 351 (Housing)	0.2	S59Cs1	0.2	High
Ref: 354 (Housing)	0.3	S67As1	0.3	Very High
Ref: 358 (Housing)	3.7	S64Ds2	3.5	Moderate
Ref: 359 (Housing)	4.1	S64Ds1	4.1	Moderate - High
Ref: 364 (Housing)	10.2	S75Bs1	10.1	Very High
Ref: 365 (Housing)	9.0	S82Bs1	9.0	Very High
Ref: 368 (Housing)	70.9	S71As2	0.5	High
		S71As1	62.9	Very High
Ref: 369 (Housing)	2.6	S71As2	2.5	High
Ref: 370 (Housing)	6.8	S71As2	6.6	High
Ref: 376 (Housing)	2.2	S32Bs1	2.2	Moderate - High
Ref: 392 (Housing)	1.5	S29As1	0.1	Low - Moderate
		S20Es2	1.2	High
Ref: 393 (Housing)	1.6	S27As1	1.5	Low
Ref: 396 (Housing)	25.8	S31As2	25.2	Moderate - High
Ref: 397 (Housing)	3.0	S42As1	1.6	Moderate
Ref: 401 (Housing)	1.2	S64Es1	1.2	Moderate - High
Ref: 402 (Housing)	1.2	S58As1	1.2	Low - Moderate
Ref: 407 (Housing)	46.2	S54Bs2	46.2	High
Ref: 409 (Housing)	0.5	S78As3	0.5	Moderate

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹	Harm Rating
Ref: 410 (Housing)	2.9	S64As1	1.1	Moderate - High
Ref: 412 (Housing)	3.8	S53As3	2.4	Moderate
Ref: 413 (Housing)	6.3	S53Cs2	6.3	Moderate
Ref: 417 (Housing)	0.6	S73As1	0.6	Very Low
Ref: 418 (Housing)	0.3	S13Bs2	0.3	Moderate
Ref: 421 (Housing)	0.9	S64Es1	0.9	Moderate - High
Ref: 430 (Housing)	2.9	S32Fs2	2.9	Moderate - High
Ref: 437 (Housing)	2.6	S53Bs1	2.4	Moderate - High
Ref: 438 (Housing)	0.9	S53Cs3	0.6	Low - Moderate
Ref: 440 (Housing)	1.9	S13Bs2	1.9	Moderate
Ref: 447 (Housing)	1.0	S53Hs2	1.0	Moderate - High
Ref: 454 (Housing)	2.3	S46As1	2.3	Moderate - High
Ref: 458 (Housing)	10.5	S53Cs2	9.2	Moderate
Ref: 463a (Housing)	2.0	S67As1	2.0	Very High
Ref: 463b (Housing)	3.4	S67As1	0.2	Very High
		S72Bs3	3.3	Low - Moderate
Ref: 463c (Housing)	1.0	S72Bs3	1.0	Low - Moderate
Ref: 463d (Housing)	4.1	S67As1	0.1	Very High
		S72Bs3	4.0	Low - Moderate
Ref: 471 (Housing)	14.6	S20Fs1	14.5	High
Ref: 474 (Housing)	0.4	S4Ds1	0.4	Very High
Ref: 474a (Housing)	10.9	S4Ds1	10.9	Very High
Ref: 477 (Housing)	2.0	S53Cs2	2.0	Moderate
Ref: 479a (Housing)	1.3	S72As2	1.3	Moderate
Ref: 486a (Housing)	3.4	S28As1	0.9	Low - Moderate
Ref: 486b (Housing)	21.1	S20Fs1	20.3	High
Ref: 486c (Housing)	94.1	S20Fs1	93.3	High
Ref: 489 (Housing)	32.0	S6As1	26.0	Low - Moderate
Ref: 490 (Housing)	0.2	S10As2	0.2	Low - Moderate
Ref: 492a (Housing)	30.6	S16Cs1	30.2	Very High
Ref: 492b (Housing)	6.2	S16Cs1	6.2	Very High
Ref: 492c (Housing)	45.6	S15As1	2.8	Very High
		S16Cs1	42.7	Very High
Ref: 493 (Housing)	0.7	S75Bs1	0.7	Very High
Ref: 494 former (Housing)	15.8	S65As1	0.6	Moderate
		S59Bs1	15.1	High
Ref: 495 (Housing)	2.9	S65As1	0.6	Moderate
		S59As1	2.3	Moderate
Ref: 503 (Housing)	14.2	S46Bs1	11.9	High
Ref: 504 (Housing)	4.1	S46As1	4.1	Moderate - High
Ref: 505 (Housing)	2.4	S57As1	0.9	Low
		S58As1	1.4	Low - Moderate
Ref: 506 (Housing)	7.3	S46As1	7.3	Moderate - High
Ref: 507 (Housing)	3.2	S53Hs1	3.2	High
Ref: 510 (Housing)	23.0	S46Bs1	22.9	High
Ref: 512 (Housing)	52.3	S46Bs1	50.6	High
Ref: 513 (Housing)	0.2	S41As2	0.2	Moderate - High
Ref: 514 (Housing)	3.9	S54Bs1	3.9	Very High
Ref: 515 (Housing)	3.5	S46Bs2	3.5	Moderate - High
Ref: 519 (Housing)	41.4	S46Cs1	2.0	Very High
		S46Cs2	26.0	High
Ref: 520 (Housing)	4.9	S20Fs1	3.6	High
Ref: 523 (Housing)	2.4	S20Cs1	0.1	High
Ref: 525 (Housing)	15.1	S13Bs1	14.3	High
Ref: 526 (Housing)	22.1	S13Bs2	0.4	Moderate
		S13Bs1	21.5	High
Ref: 527 (Housing)	21.1	S31As2	21.0	Moderate - High
Ref: 536 (Housing)	23.2	S16Ds2	5.8	High
		S16Ds1	16.7	Very High
Ref: 537 (Housing)	40.7	S20Ds1	0.2	Very High
		S20Es2	40.0	High
Ref: 537a (Housing-led mixed use)	21.7	S20Es1	21.1	Very High
Ref: 544 (Housing)	1.4	S64Cs1	1.4	Moderate
Ref: 546 (Housing)	1.9	S78As2	1.6	Moderate - High

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹	Harm Rating
		S78As1	0.1	High
Ref: 547 (Housing)	0.2	S64Cs2	0.2	Low - Moderate
Ref: 548 (Housing)	50.8	S69As1	50.2	Very High
Ref: 549 (Housing)	19.5	S81As3	6.6	Moderate
		S81As1	12.7	High
Ref: 554 (Housing)	12.8	S53Cs2	12.8	Moderate
Ref: 557 (Housing)	0.2	S71Cs1	0.2	Very High
Ref: 558 (Housing)	3.8	S64Cs1	3.8	Moderate
Ref: 559 (Housing)	24.4	S68As1	3.8	Moderate
		S67As1	20.6	Very High
Ref: 560 (Housing)	19.3	S71Cs1	3.3	Very High
		S71Cs2	15.7	Moderate - High
Ref: 561 (Housing)	4.4	S67As1	0.1	Very High
		S68As1	4.2	Moderate
Ref: 563 (Housing)	6.9	S53Cs2	6.9	Moderate
Ref: 566 (Housing)	10.7	S71Bs2	10.7	Moderate - High
Ref: 567 (Housing)	1.8	S71Cs1	1.8	Very High
Ref: 573 (Housing)	42.3	S67As1	42.2	Very High
Ref: 576 (Housing)	8.5	S64Gs2	8.4	Moderate
Ref: 577 (Housing)	38.3	S75As1	38.3	High
Ref: 582 (Housing)	24.4	S59Bs1	10.7	High
		S59Bs2	13.6	Moderate - High
Ref: 585 (Housing)	210.6	S32Es1	208.1	High
Ref: 591 (Housing)	27.4	S4Bs1	27.4	High
Ref: 592 (Housing)	20.9	S4Bs1	20.8	High
Ref: 611 (Housing)	2.6	S32Ls1	2.6	Moderate - High
Ref: 613 (Housing)	48.9	S40As1	0.2	Moderate - High
Ref: 613 (Housing)	48.9	S41Bs1	10.9	High
		S32Hs1	37.8	High
Ref: 615 (Housing)	9.2	S32Cs2	7.9	Moderate
Ref: 616 (Housing)	1.7	S32Ls1	1.6	Moderate - High
Ref: 618 (Housing)	2.1	S41Bs1	2.1	High
Ref: 624 (Housing)	0.9	S4Cs3	0.8	Moderate - High
Ref: 626 (Housing)	1.8	S53Bs1	1.8	Moderate - High
Ref: 627 (Housing)	7.1	S53Bs1	7.1	Moderate - High
Ref: 628 (Housing)	9.4	S53Bs1	9.4	Moderate - High
Ref: 629 (Housing)	12.3	S72As1	12.2	Moderate - High
Ref: 630 (Housing)	13.3	S51Bs2	8.9	Moderate - High
Ref: 633 (Employment or housing)	290.5	S32Es2	289.1	Moderate - High
Ref: 634 (Employment)	20.1	S32Es2	0.1	Moderate - High
Ref: 635 (Employment)	3.8	S20Cs1	3.8	High
Ref: 643 (Employment)	9.9	S32Ls1	9.8	High
Ref: 644 (Employment)	6.1	S20Ds1	1.7	Very High
Ref: 646a (Housing)	34.5	S44As1	29.7	High
Ref: 646b (Employment)	29.3	S44As1	0.3	High
		S20Ds1	26.7	Very High
Ref: 646c (Employment)	8.1	S20Ds1	5.5	Very High
Ref: 646d (Employment)	10.4	S44As2	0.2	Moderate - High
		S44As1	10.2	High
Ref: 647 (Employment)	8.7	S20Ds1	0.6	Very High
		S20Gs1	4.8	Moderate
Ref: 648 (Employment)	20.9	S43As1	1.0	Low - Moderate
		S42As1	11.1	Moderate
Ref: 649 (Employment)	33.6	S20Es3	13.2	Moderate - High
		S20Es1	20.3	Very High
Ref: 650 (Employment)	6.7	S4Cs3	0.1	Moderate - High
		S4Cs2	4.0	High
Ref: 651 (Employment)	81.2	S30Cs1	76.4	High
Ref: 652 (Employment)	39.6	S46Cs1	0.3	Very High
		S46Es1	0.6	Very High
Ref: 653 (Employment)	14.2	S46Es1	7.9	Very High
Ref: 654 (Housing)	84.1	S75Bs1	64.0	Very High
Ref: 655 (Housing)	31.1	S75Bs1	31.1	Very High
Ref: 657 (Housing)	36.3	S59Cs1	36.2	High

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) ⁵¹	Harm Rating
Ref: 658 (Housing)	2.0	S32Bs1	2.0	Moderate - High
Ref: 659 (Housing)	0.7	S4Ds2	0.7	High
Ref: 660 (Employment)	17.1	S20Cs1	17.1	High
Ref: 662 (Housing)	8.4	S20Hs1	8.3	Moderate - High
Ref: 665 (Housing)	158.5	S32Fs1	140.2	High
Ref: 666 (Employment or housing)	35.1	S48As1	32.2	High
Ref: 669 (Employment)	7.9	S32Es2	7.8	Moderate - High
Ref: 670 (Employment)	2.0	S32Es2	2.0	Moderate - High
Ref: 671 (Housing)	3.3	S64Ds2	3.3	Moderate
Ref: 672 (Housing)	90.0	S76As1	9.5	Moderate
		S64Fs1	80.5	Moderate - High
Ref: 673 (Housing)	1.4	S82Bs2	1.4	Moderate - High
Ref: 674 (Housing)	14.8	S32Ls1	10.1	Moderate - High
Ref: 675 (Housing)	4.5	S32Ks1	4.5	Moderate - High
Ref: 676 (Housing)	33.5	S4Ds1	33.5	Very High
Ref: 677 (Housing)	0.1	S80As1	0.1	Low - Moderate
Ref: 679 (Housing)	0.8	S20Fs1	0.7	High
Ref: 682 (Housing)	0.3	S71As2	0.3	High
Ref: 683a (Housing)	21.3	S82Cs2	17.0	High
Ref: 684 (Housing)	3.6	S71As2	3.6	High
Ref: E15a (Employment or housing)	17.5	S20As1	17.5	High
Ref: E31 (Employment)	2.5	S44As2	2.5	Moderate - High
Ref: E46 (Employment)	55.7	S32Is1	52.0	High
Ref: E47 (Employment or housing)	17.1	S4Ds2	17.1	High
Ref: E48 (Employment)	3.8	S4Cs1	3.8	Very High
Ref: E49 (Employment)	3.4	S20Cs1	3.4	High
Ref: E50 (Employment)	2.8	S6As1	2.7	Low - Moderate

⁵¹Black Country Authorities site references for cross-boundary sites within Sub-parcel scenarios in South Staffordshire.

7.8 **Table 7.3** summarises the area of land which falls within each category of harm without excluding any identified absolute constraints.

Table 7.3: Total area of land assessed at each harm rating (excluding absolute constraints)

Harm Rating	Total Area of Land (ha)	Percentage of land
Very High	2,541.9	28.7
High	3,414.6	38.6
Moderate - High	2,094.6	23.7
Moderate	537.0	6.1
Low - Moderate	170.1	1.9
Low	37.6	0.4
Very Low	46.6	0.5

- 7.9 **Table 7.4** summarises the area of land within promoted sites which falls within each category of harm (excluding any identified absolute constraints).

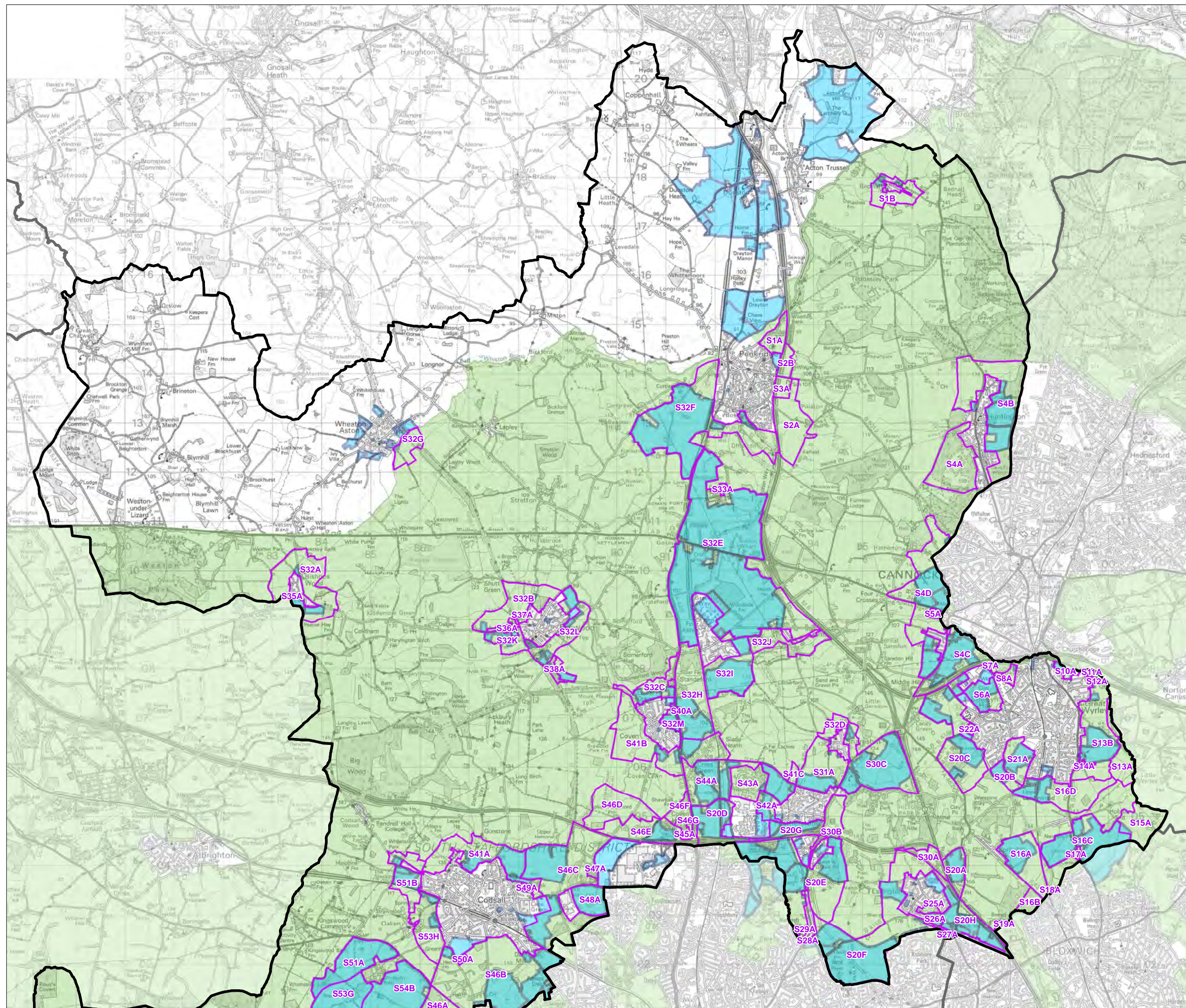
Table 7.4: Total area of land within promoted sites assessed at each harm rating (excluding absolute constraints)

Harm Rating	Total Area of Land within Promoted Sites (ha) ⁵²	Percentage of land ⁵²
Very High	985.30	27.2
High	1,571.40	43.4
Moderate - High	779.00	21.5
Moderate	197.10	5.4
Low - Moderate	81.00	2.2
Low	7.00	0.2
Very Low	0.60	0.0

Role of Green Belt Harm Assessment

- 7.10 As outlined above, consideration of the *harm* to Green Belt that could result from the release of land for development is an essential part of establishing the exceptional circumstances for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered, most notably sustainability and viability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in very high harm to the Green Belt. In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.
- 7.11 In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies the relative variations in the harm to the designation.
- 7.12 The Study does not assess the cumulative impact of the release of multiple sub-parcel scenarios on the Green Belt as a whole. That lies outside the scope of this Study as there are numerous permutations of the scenarios and sites that could be considered for release.

⁵² Note: Where sites overlap, the areas of both sites have been counted within these totals.



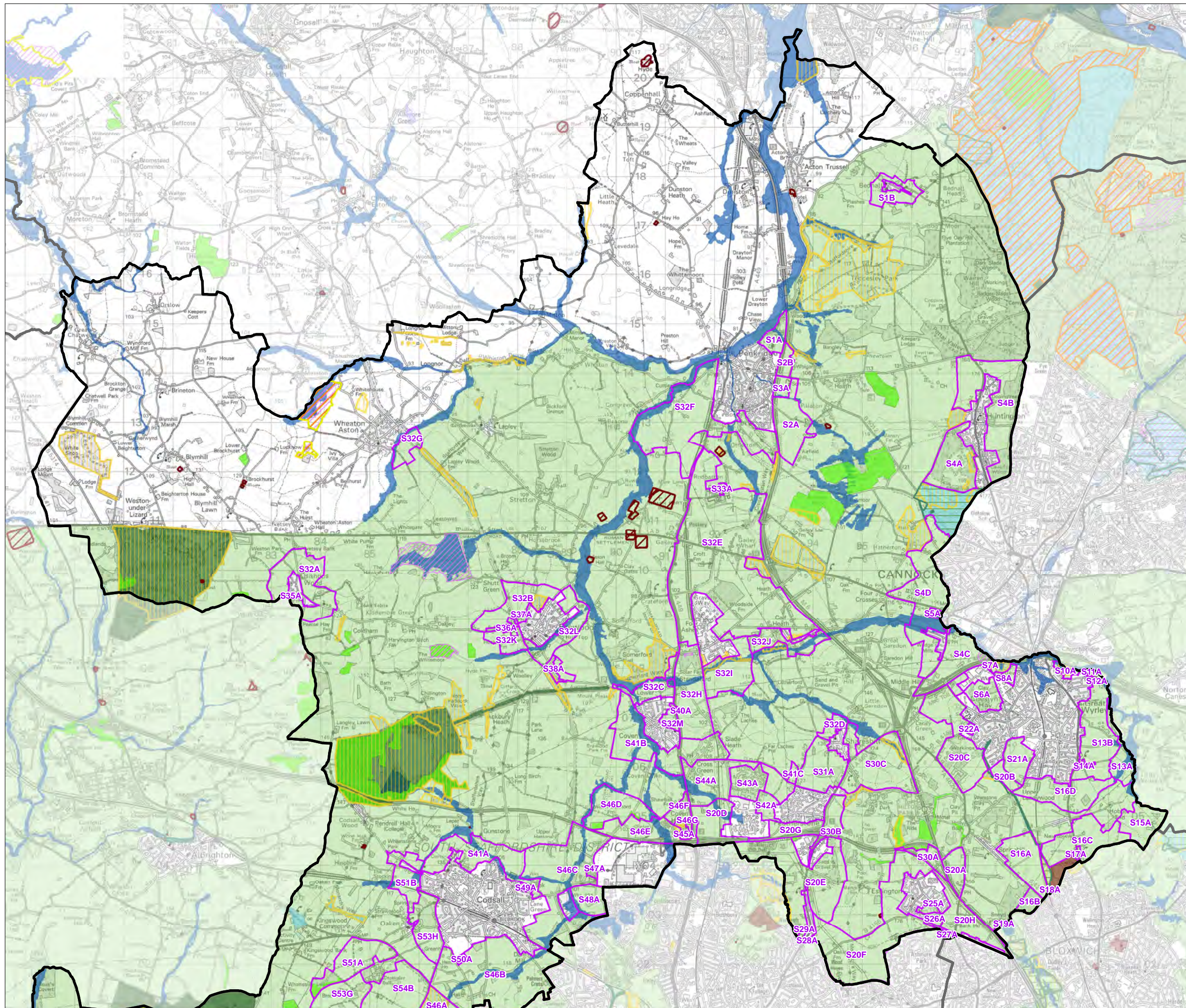
South Staffordshire Green Belt Study

Figure 7.1a: Stage 2 Sub-Parcels and Promoted Sites - South Staffordshire North

- South Staffordshire (North)
- Other Local Authority
- Green Belt
- Stage 2 sub-parcel
- Promoted site

0 2 km





South Staffordshire Green Belt Study

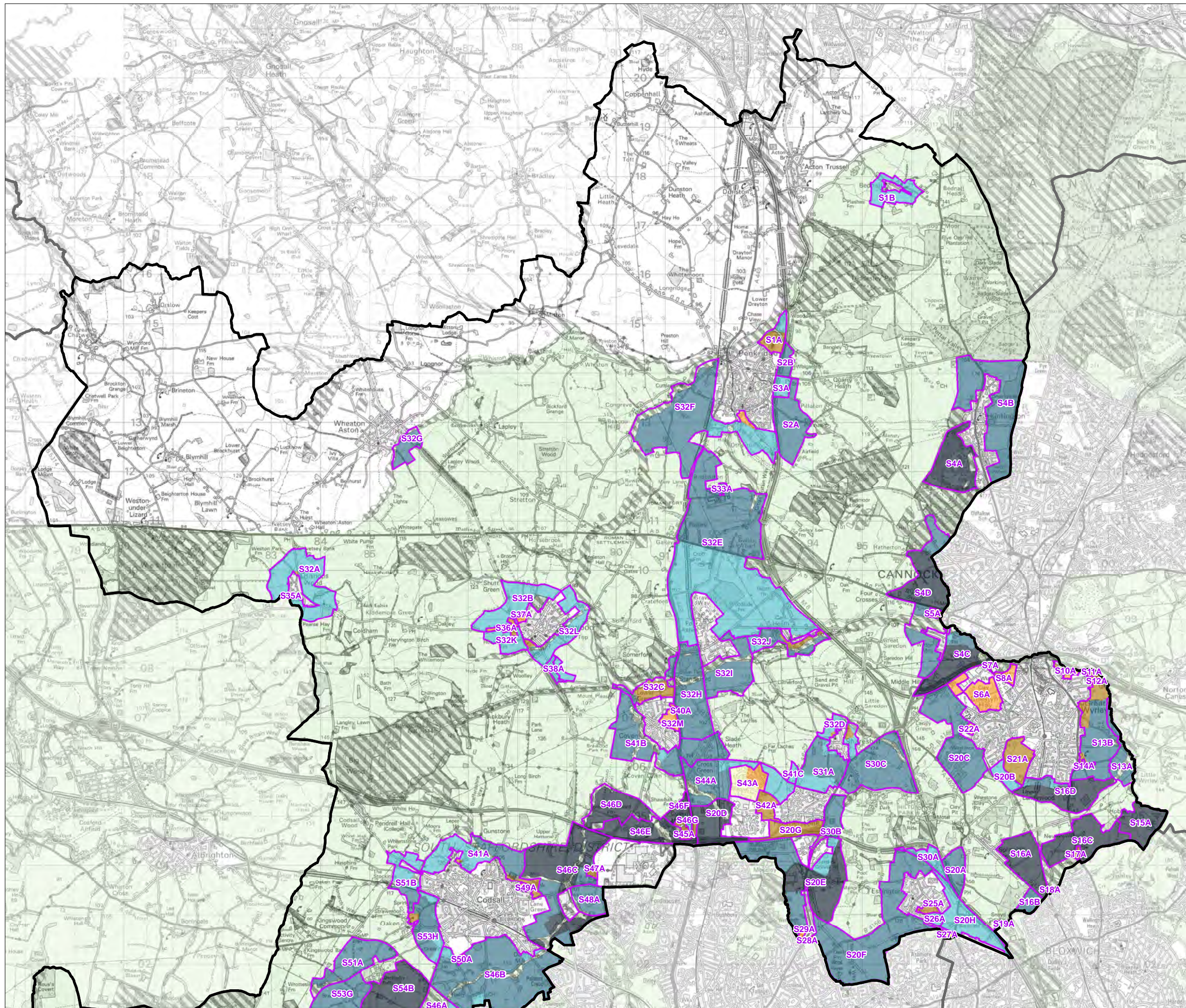
Figure 7.2a: Stage 2 Sub-Parcels and Absolute Constraints - South Staffordshire North

- South Staffordshire (North)
- Other Local Authority
- Green Belt
- Stage 2 sub-parcel
- Cultural Heritage**
 - Registered Parks and Gardens
 - Scheduled Monument
- Natural Heritage**
 - Ancient Woodland
 - Local Nature Reserve
 - SINC / SBI
 - National Nature Reserve
 - Site of Special Scientific Interest
 - Special Area of Conservation
- Other**
 - Burial Ground
 - Common Land
 - Flood Zone 3

Please note: Sites of Importance for Nature Conservation (SINC) are located only within the Black Country and Sites of Biological Importance (SBI) are located only within South Staffordshire. They are the equivalent of one another.

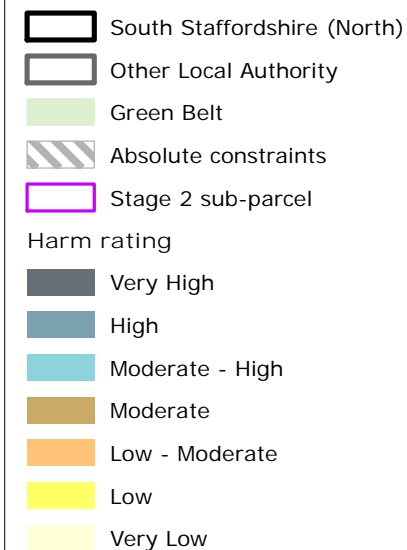
0 2 km





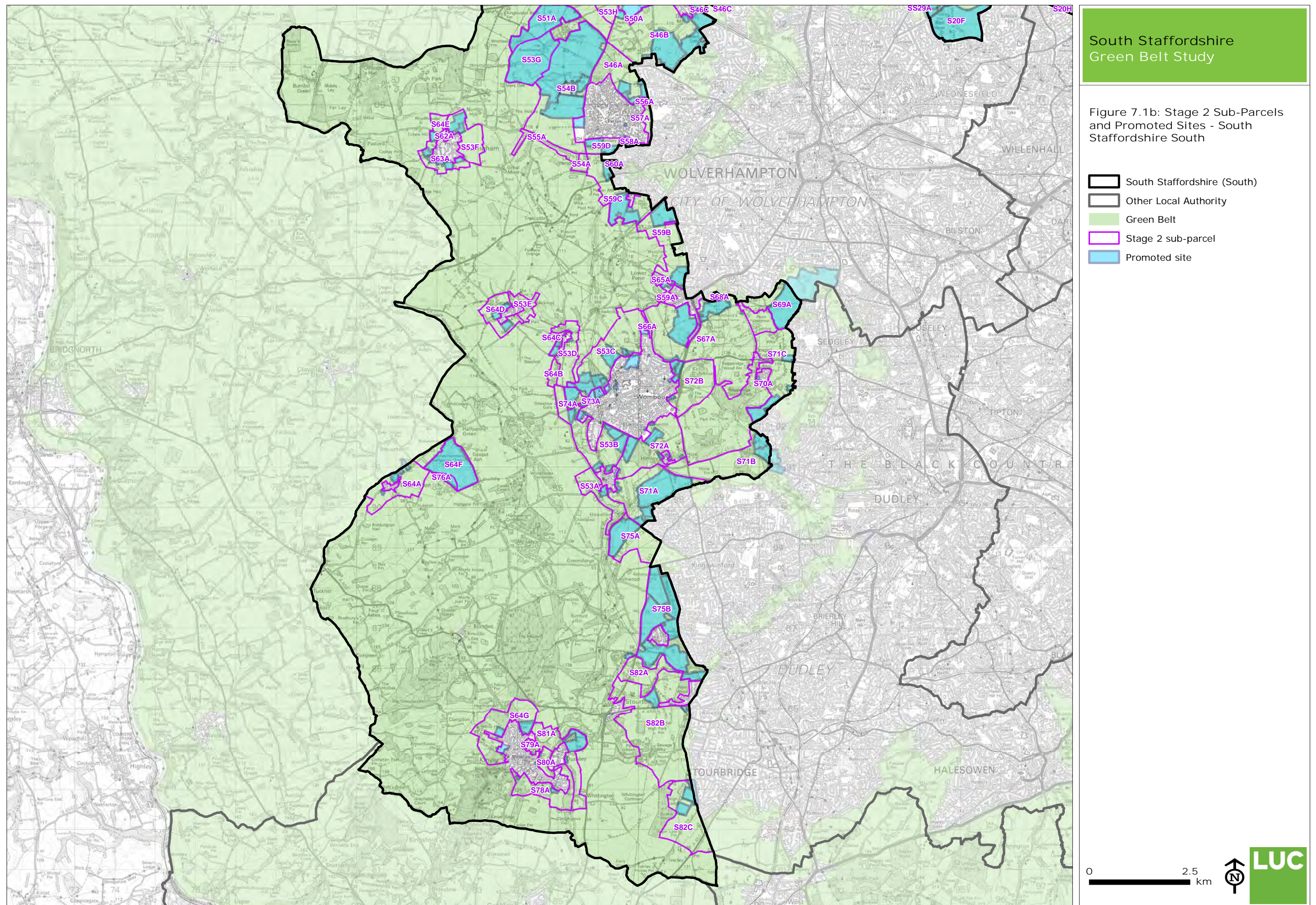
South Staffordshire Green Belt Study

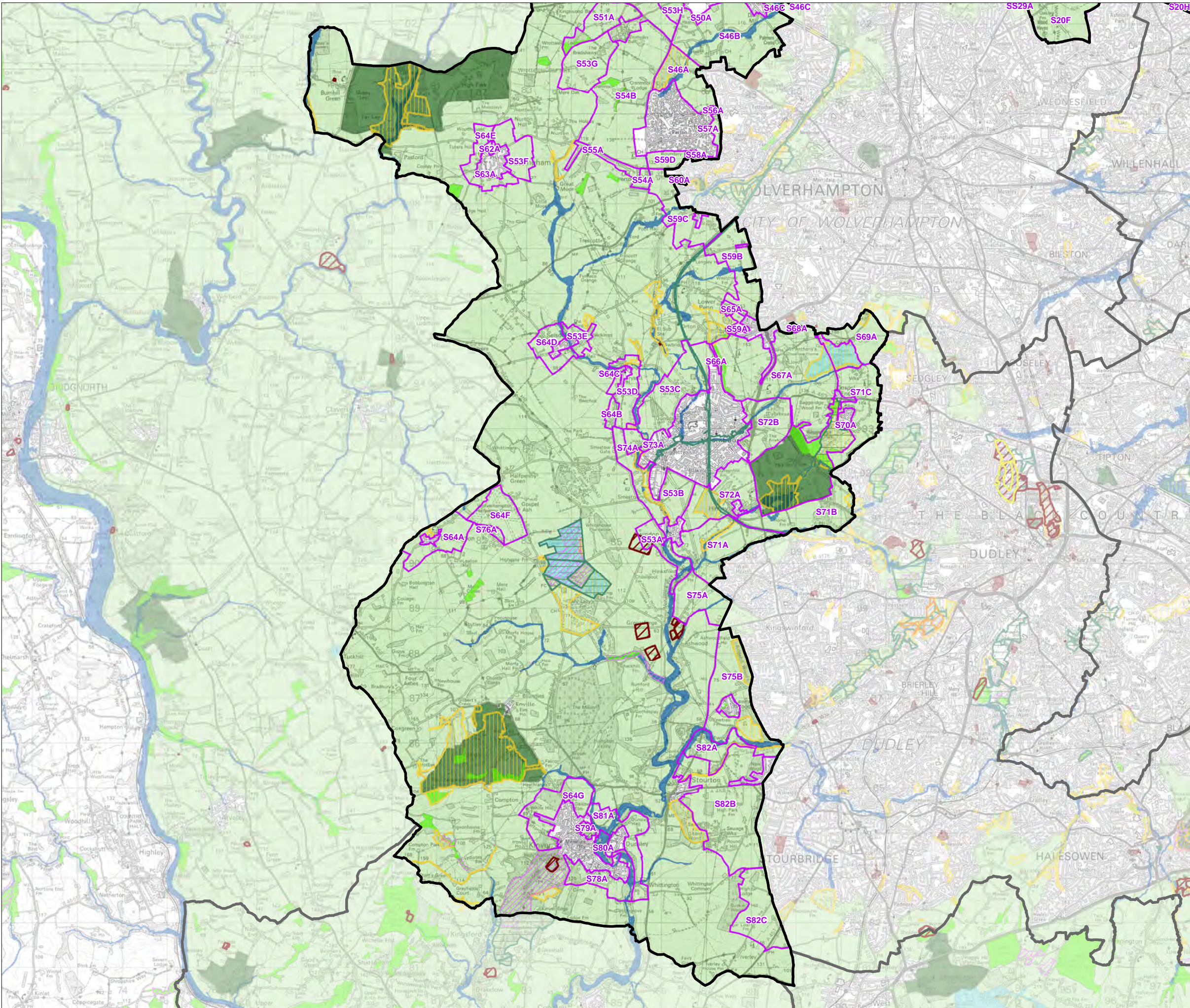
Figure 7.3a: Harm Assessment -
South Staffordshire North



0 2 km





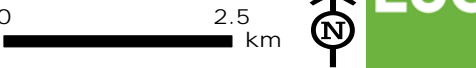


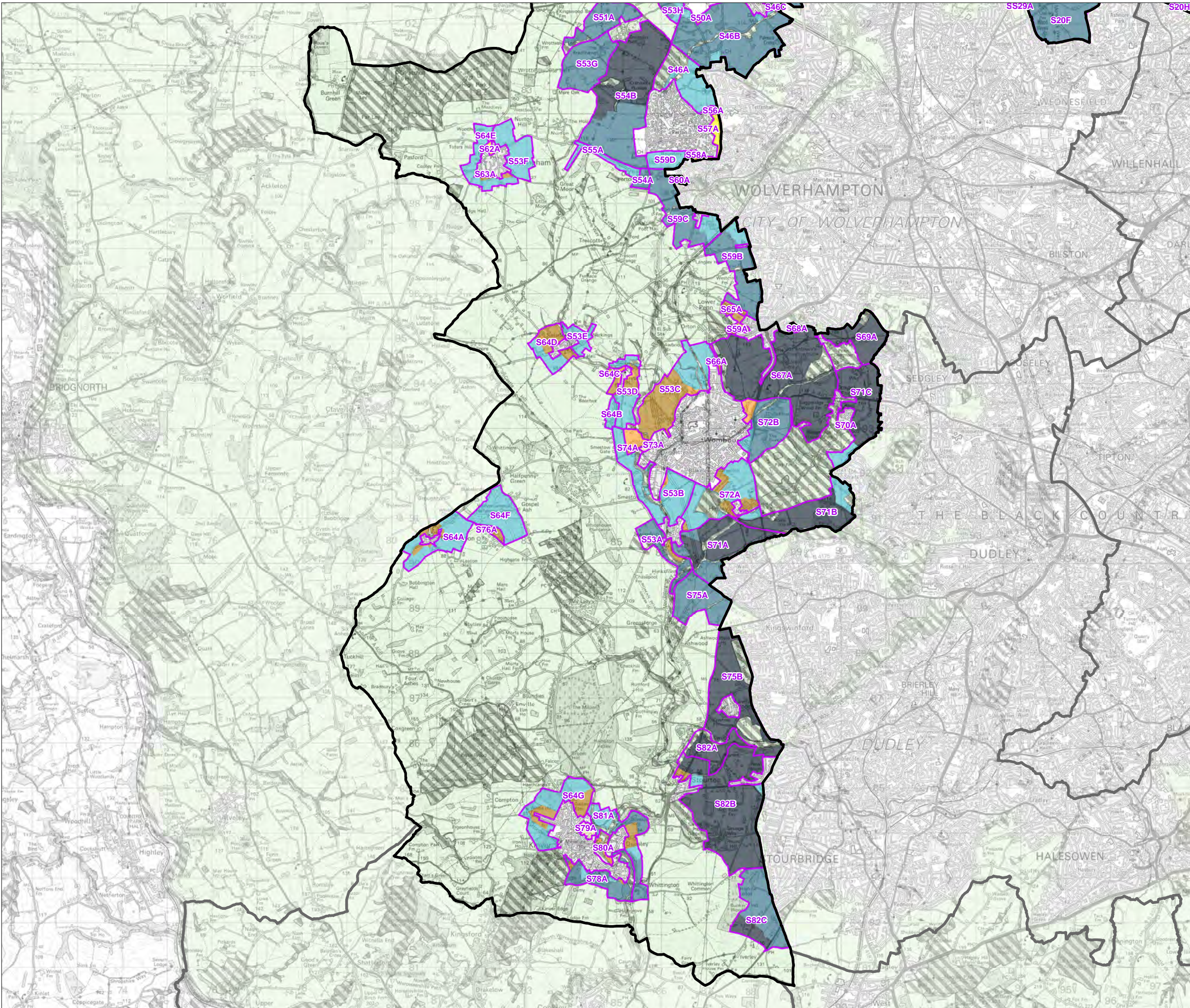
South Staffordshire Green Belt Study

Figure 7.2b: Stage 2 Sub-Parcels
and Absolute Constraints - South
Staffordshire South

- South Staffordshire (South)
- Other Local Authority
- Green Belt
- Stage 2 sub-parcel
- Cultural Heritage
 - Registered Parks and Gardens
 - Scheduled Monument
- Natural Heritage
 - Ancient Woodland
 - Local Nature Reserve
 - SINC / SBI
 - National Nature Reserve
 - Site of Special Scientific Interest
 - Special Area of Conservation
- Other
 - Burial Ground
 - Common Land
 - Flood Zone 3

Please note: Sites of Importance for Nature Conservation (SINC) are located only within the Black Country and Sites of Biological Importance (SBI) are located only within South Staffordshire. They are the equivalent of one another.





South Staffordshire Green Belt Study

Figure 7.3b: Harm Assessment - South Staffordshire South

- South Staffordshire (South)
- Other Local Authority
- Green Belt
- Absolute constraints
- Stage 2 sub-parcel
- Harm rating
 - Very High
 - High
 - Moderate - High
 - Moderate
 - Low - Moderate
 - Low
 - Very Low

Part D: Making Changes to the Green Belt



8 Making Changes to the Green Belt

Introduction

- 8.1 The following chapter sets out the key steps that the Council should consider if there is an identified need to release land from the Green Belt. The chapter also sets out potential mitigation measures that could be applied to reduce the potential harm to the Green Belt, if land is released. This is followed by a discussion of the potential opportunities for enhancing the beneficial use of the Green Belt (in line with paragraph 141 of the NPPF). However, it should be noted that this Chapter does not contain an exhaustive list of potential mitigation measures or enhancement opportunities. It is therefore recommended that mitigation and enhancement are carefully considered when more detailed information about proposed development is available.

Making Changes to the Green Belt

- 8.2 The NPPF requires changes to the Green Belt to be made through the Development Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.
- 8.3 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes⁵³. In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, higher performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.
- 8.4 Before concluding that 'exceptional circumstances' exist to justify changes to the Green Belt, paragraph 137 of the NPPF states that local authorities should demonstrate that all other 'reasonable options' for meeting its identified need for development have been considered. In particular local authorities need to consider whether their strategy:
- 1) makes effective use of suitable brownfield sites and underutilised land;
 - 2) optimises the density of development in town and city centres and other locations well served by public transport; and
 - 3) explores whether other authorities can help to meet some of the identified development requirement.

⁵³ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

- 8.5 Should the Council decide to release land from the Green Belt, careful consideration also needs to be given to the form of the amended Green Belt boundaries. As set out in Para 139 of the NPPF:

“When defining Green Belt boundaries, plans should:

- ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- not include land which it is unnecessary to keep permanently open;*
- 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;*
- 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;*
- be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Mitigation to Reduce Harm to Green Belt

The concept of mitigation

- 8.6 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 weakened? 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, it resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.
- 8.7 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area. However, any release of Green Belt land will still require ‘exceptional circumstances’ to be demonstrated.
- 8.8 Mitigation could apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

Mitigation themes

- 8.9 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. The Green Belt purposes are considered to relate to the relationship between the land area in question, developed land and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape/physical elements, including boundary features (in either separating the area from, or connecting it to) built-up areas and the wider countryside.
- 8.10 **Table 8.1** below lists some mitigation measures that could be considered as part of the planning and development process. Which mitigation measures are the most appropriate will vary, depending on local circumstances.

Table 8.1: Potential measures to mitigate harm to Green Belt

Mitigation measure	Benefits	Considerations
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.
Strengthen boundary at weak points – e.g. where 'breached' by roads	Reducing opportunities for sprawl	The use of buildings and landscaping can create strong 'gateways' to strengthen settlement-edge function
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.
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.
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).
Enhance visual openness within the Green Belt.	Increasing perception of countryside.	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.

Mitigation measure	Benefits	Considerations
Preserve/enhance landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character.	Preserving setting and special character of historic towns.	Landscape character and historic settings assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
Enhance access within the Green Belt.	Increasing perception of countryside.	Uses of the countryside that permits an appreciation of it as a connected area with valued characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoiding truncation by major roads, or provision of access along the Green Belt boundary to strengthen its role.
Improve management practices to enhance countryside character.	Increasing strength of countryside character.	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements.	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain/create separation between existing washed-over settlement and new inset settlement.	Minimising urbanising influences that could weaken the justification for retaining the washed-over settlement's status.	Ensure that the gap is sufficiently wide to maintain a sense of separation.
Design road infrastructure to limit perception of increased urbanisation associated with new development.	Reducing perception of urbanisation.	Increased levels of 'activity' can increase the perception of urbanisation.
Use sustainable drainage features to define/enhance separation between settlement and countryside.	Strengthening separation between urban and open land.	Need to determine if local topography and ground conditions are suitable.

Beneficial Use of Green Belt

- 8.11 The purposes of Green Belt do not make any reference to the quality or use of land falling within the designation, but paragraph 141 of the NPPF states that:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

- 8.12 Furthermore, paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should ‘set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land’. This could be achieved through legal agreements in conjunction with the release of land and planning consent for development, or through strategic enhancement initiatives e.g. creation of community woodland.
- 8.13 The NPPF suggests different types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary/buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.

Potential opportunities to enhance use

- 8.14 Some of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land’s future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 8.2** below.
- 8.15 Beneficial uses could be achieved through legal agreements in conjunction with the release of land and consent for development, including Council management of land.

Table 8.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity. Linkages could be provided to identify environmental networks. There may also be opportunities to link enhancements with requirements to deliver ‘biodiversity net gain’ associated with development proposals.

Beneficial use	Considerations
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

- 8.16 Many of the beneficial uses outlined in **Table 8.2** could be identified via an Open Space Strategy and Ecological Networks Study. This would identify the key opportunities for landscape, access, recreation and biodiversity enhancements within both the Green Belt and beyond.
- 8.17 It is noted however, that Local Authorities may still be able to protect features such as open spaces, leisure facilities, burial grounds and nature conservation sites through other policy approaches/designations.

Conclusion

- 8.18 The boundary of the Green Belt in South Staffordshire is complex and the product of a long history. There are areas where the current boundary does not match development on the ground. There will be cases therefore where South Staffordshire Council may wish to make detailed corrections and amendments to the current boundary and the Local Plan Review will provide the mechanism to do this.
- 8.19 It is also recommended that policy guidance, or where necessary masterplans should be prepared as part of, or following on from, the Local Plan process. Masterplans should draw on the findings of the Green Belt Study and any detailed site-based Green Belt assessment work to indicate development areas, new permanent Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments. Such an approach, together with specific policies for the development of the land, would help to minimise harm to the remaining Green Belt.

Appendix 1

Duty to Cooperate Consultation - Comments on Methodology

This Appendix provides a summary of the comments received in the Duty to Cooperate consultation on the proposed Green Belt Review methodology.

Stakeholder	Comments	LUC Response
Cannock Chase District Council	<p>Would be useful to see what parcels are to be defined and assessed.</p> <p>Support the study not covering parcels outside of study area.</p> <p>Questioned how cross boundary call for sites are treated. Would welcome further involvement in the assessment process.</p>	<p>The parcels are an output of Stage 1 which considers variations in the contribution to the Green Belt Purposes. Maps showing the location of the parcels are published within the report.</p> <p>Noted.</p> <p>Where 'Call for Sites' sites cross boundaries, we note this as part of the harm assessment. The study undertaken for Cannock Chase DC in 2016 considered contribution to Green Belt purposes, but did not include an assessment of harm associated with the release of land.</p>
	<p>Whilst some urban areas not included in defined large built up areas/towns definitions assume they will still be taken into account as part of wider 'openness' considerations i.e. absence/presence of built form and merging of 'towns' (as per para 2.22)?</p>	<p>Yes. The report details in Figure 3.1 the settlements which have been defined as the large built up area, and in Figure 3.2 and Table 3.1, the settlements which have been defined as town in the assessment of Purpose 2.</p> <p>Smaller urban areas that are not considered to form part of the large built up area or constitute towns are considered with regards to their urbanising impact affecting sprawl (Table 4.2: Purpose 1 assessment criteria), their impact on the perceived separation of towns (Table 4.3: Purpose 2 assessment criteria), and their impact on 'openness' (Table 4.4: Purpose 3 assessment criteria).</p>
	<p>Para 2.27- will this approach only assume those use classes specified (agriculture, forestry, outdoor recreation etc.) are appropriate i.e. any housing or employment related development outside of these categories is not appropriate (concerned a wider range of uses could be considered as appropriate by default, under 'redevelopment')?</p>	<p>See para 3.28 of this report. We have therefore exercised caution in the application of what is defined as an appropriate use. It is not possible within a Strategic GB study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut eg for example buildings for agriculture and forestry are deemed to be appropriate development in absolute terms regardless of whether they preserve the openness or conflict with the GB purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, we have taken a considered view on the extent to which the proposed land use has affected the GB purposes for example by affecting openness, or encroaching on the perception of countryside ie the sense of distinction between the urban area and countryside etc.</p>

Stakeholder	Comments	LUC Response
	Support identification of Cannock as historic town in context (para 2.35).	Cannock was considered further as part of the assessment of contribution to Purpose 4. As reported in the South Staffordshire Green Belt Study: <i>"Cannock was a small rural community until expansion in the latter part of the 19th century in association with the mining industry. The Cannock Conservation Area Appraisal notes the extent of containment of the historic core by later development, and makes no reference to the role of countryside in forming a setting or contributing to character. This core is some distance from prominent landscape features – notably Cannock Chase to the north and, within South Staffordshire, the wooded heathland of Shoal Hill - and although there is some intervisibility Cannock does not derive any 'special character' from a relationship with Green Belt landscape."</i> (para. 0) See also below.
	Para 2.43 - includes an error, as Cannock Chase Green Belt study did include Rugeley as an historic town.	Text corrected (see report paras 3.38-0).
	Para 3.8 refers to appropriate development – see comments regarding Para 2.27 above.	See response above.
	Support clear separation of landscape sensitivity considerations from Green Belt purposes assessment.	Noted.
Shropshire Council	The council wish to ensure that the Shropshire and South Staffordshire studies are complementary and any conflicting references or assessment outcomes, are minimised or can be substantiated to the extent necessary to support the Examination of the Shropshire Local Plan.	Noted.
	The Shropshire Local Plan Preferred Option Proposals have already consulted on significant potential Green Belt releases around Shifnal and to the East of Bridgnorth and Albrighton (with more limited release at Alveley) and will consider potential sites put forward within the Green Belt in the M54 corridor, which have the potential to meet cross boundary growth needs.	Noted.
	A different approach to that used in Shropshire is being employed for the BC & SS Stage 1 assessment, which will involve the identification of parcels based on outcomes from an initial assessment of varying contributions of different areas to the NPPF defined GB purposes.	A summary of key points from neighbouring Green Belt studies is included within the Green Belt Study Reports (Table 2.2). There are some differences in the findings of the Stage 1 studies with regard to Purpose 2 but this relates to the process which was used to define the parcels. The Stage 1 ratings for the Broad Areas in the Shropshire study which border South Staffordshire are based on an average across the parcels, which differs from the approach used in the Black Country South Staffordshire Study. Both approaches are equally valid and justified. There are no differences in the approaches used for the Stage 2 studies.

Stakeholder	Comments	LUC Response
	Points were raised in relation to the method used for the Shropshire and South Staffordshire / Black Country Green Belt Studies. Attention was drawn to the need to consider historic towns in neighbouring authorities. Reference was made to the consideration of distance to settlements beyond boundaries in the Shropshire GB Study.	The studies are consistent in their definition used to assess the GB purposes and account has been taken of towns outside of the Black Country, including in respect of Green Belt purpose 4. Noted.
	Subject to adequate justification, support the LUC approach in that it will provide a broader and linked up picture of the West Midlands Green Belt.	Noted.
Historic England	Historic England has no concerns in relation to the proposed methodology.	Noted.
North Warwickshire Borough Council	Questioned how the Green Belt Study compares with the Coventry and Warwickshire Green Belt Study carried out by LUC – the method statement for that work was to be the basis for all other studies in the region.	<p>The Coventry and Warwickshire Joint Green Belt Study and the Black County and South Staffordshire Study both represent strategic assessments of the Green Belt designed to draw out variations in contribution of land to the five Green Belt purposes.</p> <p>The Black County and South Staffordshire Study is split into two stages, representing two scales of assessment. Stage 1 draws out strategic variations in the 'contribution' of Green Belt land to the Green Belt characteristics and purposes (like the Coventry and Warwickshire Joint Green Belt Study), but Stage 2 involves a more focused assessment of the potential 'harm' of removing specific areas of land, including specific development sites, from the Green Belt.</p>
Wildlife Trust	<p>Welcomes approach to ecological constraints, but would like to see Sites of Local Importance for Nature Conservation (SLINC) added to the list of 'absolute' environmental constraints, and the inclusion of the Nature Improvement Area (NIA) Strategy 2017 – 2022 within the identification or evaluation of assessment areas for stage 2 green belt assessment.</p> <p>As a whole the ecological network map allows for a landscape scale approach with assessing areas of constraints ensuring that the release of a site from the green belt will not result in the impact to a significant ecological corridor or priority habitat within the regional landscape.</p>	<p>The Black Country Study has gone further than recent work for the Housing Market Area in taking SINC status to be an absolute constraint on development. SLINC are locally designated sites of a lesser status than SINC, and details of impacts and potential mitigation will be a matter for the local authorities.</p> <p>It is not appropriate to consider the NIA strategy core areas as an absolute constraint in the Green Belt study. However, NIAs are one way of increasing biodiversity in the Green Belt in the context of improving the beneficial use of the Green Belt (Table 8.2).</p>