

Land at Cross Green, South Staffordshire Green Belt Position Paper edp5393_r005c

1. Introduction, Purpose and Approach

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Taylor Wimpey UK Ltd (the 'Promotor') to prepare a Green Belt Position Paper to inform the proposed allocation of land east of the Stafford Road (A449) near Wolverhampton, Staffordshire ('the site').
- 1.2 South Staffordshire District Council (SSDC) acts as the statutory planning authority and the site is located entirely within the West Midlands Green Belt. The site is being promoted as part of the District's Local Plan Review, with the Preferred Options consultation identifying the site as a preferred strategic housing allocation to deliver a minimum of 1,200 homes and a new community on a key transport corridor.
- 1.3 This Green Belt Position Paper should be read alongside the Landscape Position Note (reference **edp5393_r004**), which sets out the prevailing landscape and visual circumstances of the site and its surroundings.
- 1.4 EDP is an independent environmental consultancy providing advice to landowners and property development clients in both public and private sectors, in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The practice operates throughout the UK from offices in Cirencester, Cardiff and Cheltenham. Details can be obtained at our website (www.edp-uk.co.uk).

Site Location and Description

- 1.5 The site is situated within the administrative authority of SSDC and measures approximately 54 hectares (ha). It is located at Ordnance Survey Grid Reference (OSGR) SJ 918 052 (site centre).
- 1.6 The site is located approximately 1.25km west of the village of Featherstone and approximately 6km north of Wolverhampton City Centre. There are wayside dwellings situated along the Stafford Road (A449) and the nucleated dwellings and farmstead around the site form the most immediate residential setting for the site.

Purpose

- 1.7 The purpose of this Position Paper is to examine the potential impacts of future development on the Green Belt (in landscape terms only), taking into account the current use of the site, its landscape character and the visual context of the site.

- 1.8 The findings of this process as well as other technical studies, including landscape and visual, have been developed by EDP to inform the emerging development proposals for the site at this preliminary stage.

Approach

- 1.9 There is no formal published methodology for assessing impacts on openness of Green Belts. Therefore, the approach adopted is based on the experience of a Chartered Landscape Architect and uses relevant case law in support. Several assumptions are made in respect of some elements of the development proposals which have been informed by a Development Framework Plan.

2. Planning Context and Relevant Considerations

- 2.1 The proposal for a West Midlands Metropolitan Green Belt was put forward in 1955 and was formally approved in 1975. The Green Belt surrounds the urban areas of Birmingham, Solihull, Coventry and the Black Country. The West Midlands Green Belt was established to stop major urban areas from merging together, as well as preventing the merging of smaller towns and cities on the periphery of the Green Belt. 'Washed over' by the Green Belt, south of the conurbation, there are a number of towns including Bromsgrove, Redditch and Kidderminster.
- 2.2 The quantum of Green Belt within the West Midlands, and within the County of Worcestershire, relied upon boundaries which were originally proposed in the County Development Plan for Worcestershire (1957) and confirmed generally in the County Structure Plans since 1975.
- 2.3 As set out in the *National Planning Policy Framework* (NPPF), 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. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value.
- 2.4 Notwithstanding the general stance on the protection of the Green Belt, the NPPF is also clear that Green Belt boundaries can be altered, but only in exceptional circumstances and that this process can only be undertaken through the preparation or review of the Local Plan.
- 2.5 NPPF paragraph 138 continues, and sets out five purposes of the Green Belt, which are listed below:
- a) *"To check the unrestricted sprawl of large built-up areas;*
 - b) *To prevent neighbouring towns merging into one another;*

- c) *To assist in safeguarding the countryside from encroachment;*
- d) *To preserve the setting and special character of historic towns; and*
- e) *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

2.6 Guidance in paragraph 142 makes clear that, when reviewing Green Belt boundaries, Local Planning Authorities (LPAs) should take account of the need to promote sustainable patterns of development and consider the consequences for sustainable development, of channelling development towards urban areas and towns and villages, inset within the Green Belt, or towards locations outside the Green Belt boundary.

2.7 The NPPF sets out guidelines for local planning authorities in relation to Green Belts, including the desire to plan positively to enhance the beneficial use of the Green Belt, looking for opportunities to provide access, outdoor sport and recreation and to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land (paragraph 145).

2.8 Also of relevance to this report is guidance in paragraph 143 with regard to defining boundaries, which states that local authorities should, *inter alia*:

- Not include land that it is unnecessary to keep permanently open; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The History of Green Belt within SSDC

2.9 South Staffordshire District is located to the south of Stafford, within the West Midlands Green Belt. The district abuts a number of the Black Country administrative areas to its east, including the City of Wolverhampton.

2.10 Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955. 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.

2.11 The Green Belt has remained relatively successful in checking the sprawl of Birmingham, 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.

- 2.12 With around 80% of the district designated as Green Belt, South Staffordshire has been relatively successful at preventing the outward spread of the larger urban conurbations. 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.
- 2.13 In summary, there are 32,320ha within the administrative area of SSDC, which equates to approximately 80% of the overall area of the district and circa 2% of the overall Green Belt across the whole of England.

SSDC South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019)

- 2.14 In July 2019, and as part of their Local Plan Review, SSDC published their South Staffordshire Green Belt Study (Stage 1 and 2 Report). This document provides their preferred methodology for undertaking such a review and facilitates the Green Belt Study.
- 2.15 This study was undertaken by LUC on behalf of the LPA. Stage 1 considers the contribution made by the land parcel to the five Green Belt purposes, *"identifying areas of land whose performance ranges from relatively weak to relatively strong in Green Belt terms."*
- 2.16 This Green Belt Study has two stages:
- Stage 1 draws out strategic variation in the 'contribution' of Green Belt land to the Green Belt purposes as defined in the NPPF; and
 - Stage 2 includes a more focused assessment of the potential 'harm' of removing land from the Green Belt.'

Stage 1 Critique

- 2.17 With regard to SSDC's Stage 1 appraisal, EDP provides the following critique. Both stages of the study were undertaken by strategically splitting the District's Green Belt into 82 land parcels. The extent of each land parcel was defined using Ordnance Survey maps and aerial photography, and uses clear physical features such as motorways, A roads, B roads, some minor roads, railways and canals.
- 2.18 In line with NPPF paragraph 143, which states: *"When defining Green Belt boundaries, plans should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"*, SSDC assert that they have defined land parcels through a selection process based on such physical features.
- 2.19 **Image EDP 2.1** below is an extract of SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). SSDC have assessed the site as part of two significant tracts of land north of Wolverhampton. The first is referred to as Land Parcel S20 - between

Wolverhampton, Walsall and Cheslyn Hay, which the southern half of the site is situated within. Land Parcel S44 is West of Featherstone prison (north).

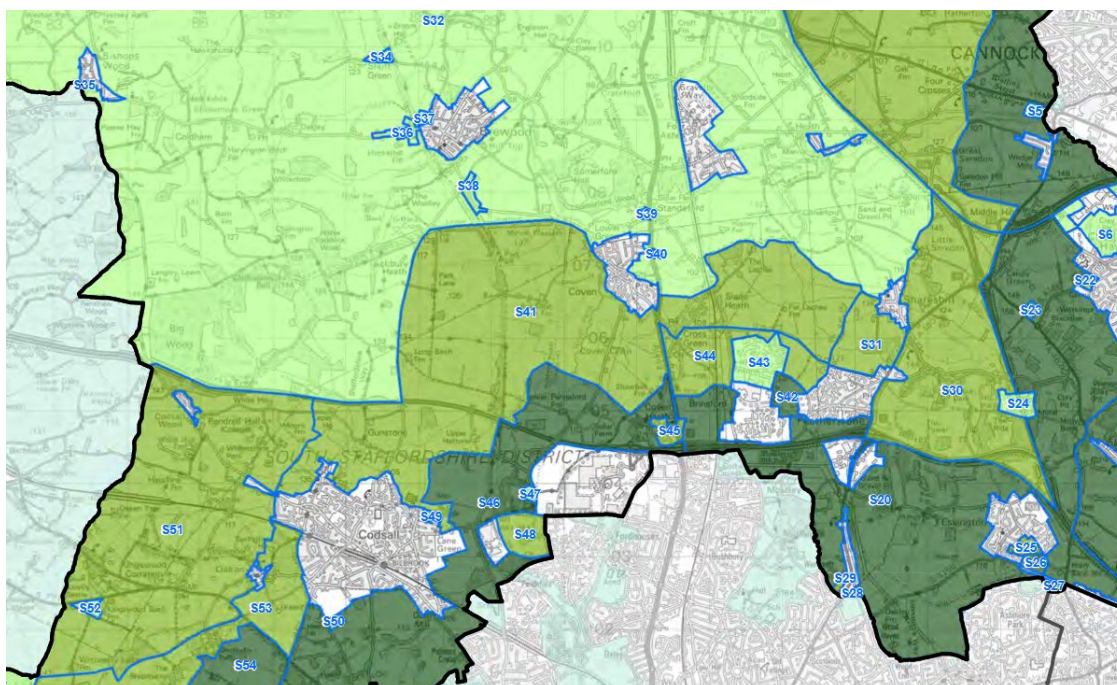


Image EDP 2.1: Extract from SSDC South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). Land Parcels S20 and S44 are shown on this extract, for which the site is a percentage of its quantum.

- 2.20 SSDC confirms that the overall quantum of these two land parcels is 1,221.2ha and 85.3ha respectively. This totals over 1,300 hectares of land which SSDC has appraised for the Stage 1 review. This is a very extensive area to reach a consistent appraisal summary for.
- 2.21 Nonetheless, with consideration of SSDC’s assessment of Green Belt function for Land Parcels S20 and S44, the following is noted in **Table EDP 2.1:**

Table EDP 2.1: Scoring for S20 and S44 against the Green Belt Purposes (i-v) as Appraised by SSDC’s South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019), Stage 1.

Purpose	Stage 1: Overall Land Parcel S20 (1221.2ha)	Stage 1: Overall Land Parcel S44 (85.3ha)
Purpose 1: To check the unrestricted sprawl of large built-up areas	<i>Strong</i>	<i>Moderate</i>
Purpose 2: Prevent neighbouring towns from merging	<i>Moderate</i>	<i>Moderate</i>
Purpose 3: Assist in safeguarding the countryside	<i>Strong</i>	<i>Strong</i>

Purpose	Stage 1: Overall Land Parcel S20 (1221.2ha)	Stage 1: Overall Land Parcel S44 (85.3ha)
Purpose 4: Preserve the setting and special character of historic towns	<i>Weak/No Contribution</i>	<i>Weak/No Contribution</i>
Purpose 5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	<i>Strong</i>	<i>Strong</i>

- 2.22 With consideration of the local area and a number of field-based visits during 2019 and 2021, EDP considers that these land parcels are not defined relative to clear physical features such as Motorways (M54), A roads (A449 Stafford Road), B roads, some minor roads, railways (West Coast railway line connection to a regional City) or canals (Staffordshire and Worcestershire canal). All of these features occur within the site and the local area and create distinct barriers to land tracts.
- 2.23 EDP notes that such physical features are used in the definition of Land Parcel S44; for instance, the Stafford Road dual carriageway (A449), yet the land parcel extends beyond the West Coast Mainline railway connection to Featherstone prison, stretching to the east in a linear corridor to the settlement edge of Featherstone.
- 2.24 Additionally, EDP also notes that Land Parcel S20 is much greater in quantum than S44 and similarly utilises the Stafford Road (A449 dual carriageway) as the western edge of the land parcel. However, the land parcel extends beyond the West Coast Mainline railway connection and also beyond the M54 Motorway south of this arterial route, to wrap around the northern suburban areas of Wolverhampton. Instead, the minor ‘washed over’ settlement of Essington and the less extensive A roads are utilised to define the land parcel.
- 2.25 EDP considers the definition of these land parcels to be at odds with the definition of Green Belt boundaries defined in NPPF paragraph 143. Whilst SSDC use primary hierarchical features that are robust, durable and long established in some areas, they use less significant boundaries in other locations, especially around existing settlements.
- 2.26 Given the foregoing, EDP would advocate an individual site-based assessment for contribution to Green Belt role; see **Section 4** of this Position Paper.

Stage 2 Critique

- 2.27 With regard to SSDC’s Stage 2 appraisal, EDP provides the following critique. Land Parcel S44 includes the northern section of the site area; see **Image EDP 2.2** below.

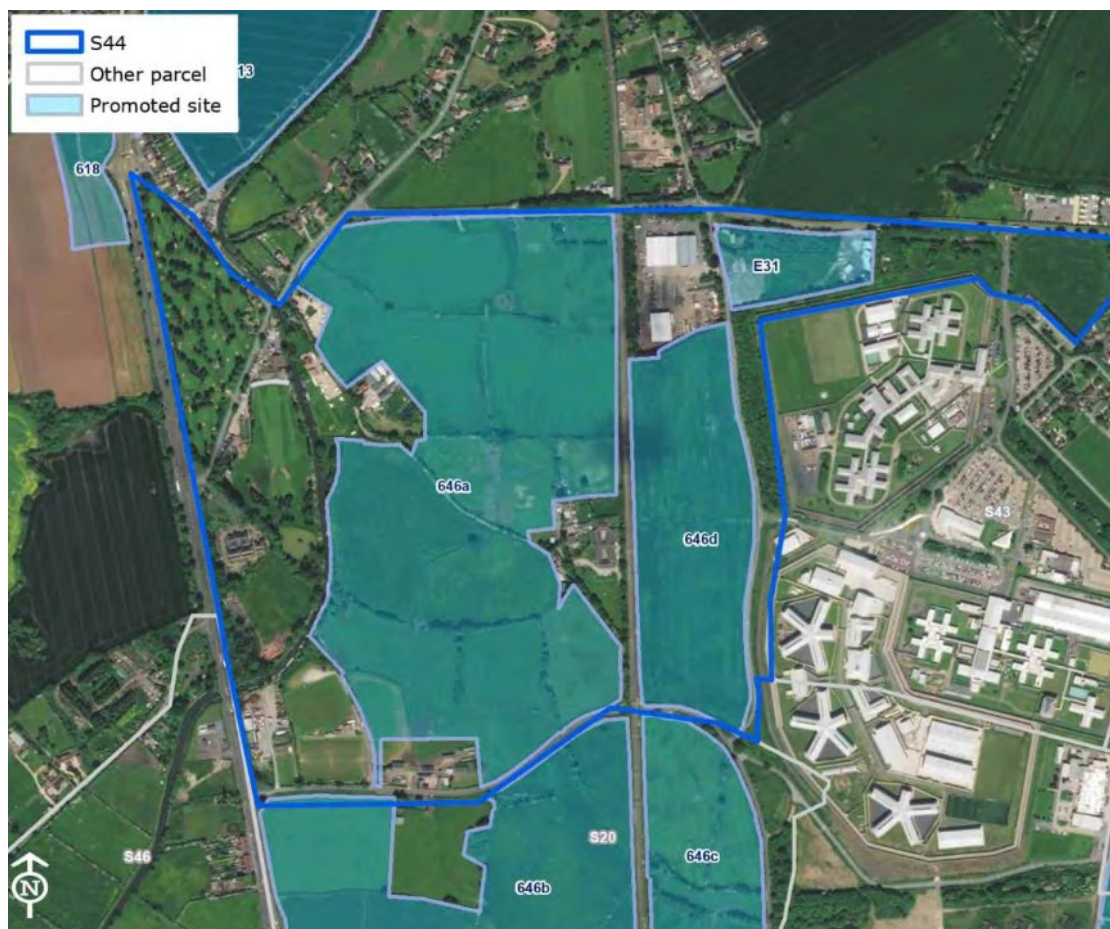


Image EDP 2.2: Extract from SSDC South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). Land Parcel S44 is shown on this extract, for which the site is a percentage of its quantum.

2.28 SSDC broke down land parcels from Stage 1 into a number of sub-parcels. The definition of these sub-parcels is varied and uses a 'set' of 'absolute' environmental constraints – i.e. areas within which the Council would currently not permit development. 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; and*
- *Other constraints: Common Land, Flood Zone 3 Areas, Burial Ground.”*

2.29 SSDC acknowledges that ‘in some cases, the commentaries on individual parcels have offered comments as to whether features on the ground might provide possible

boundaries'. Given the quantum of land appraised in Stage 1 by SSDC, this approach seems at odds with the guidance provided by the NPPF for Green Belt release.

2.30 It is noted that this lack of appreciating durable, physical boundaries that have been long established in defining a land parcel sub-parcel, seems at odds with the recommendations of NPPF paragraph 143, which states “When defining Green Belt boundaries plans should.....define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

2.31 With consideration of the site, it falls within sub-parcels S44A and S20D as shown on **Image EDP 2.3** below.

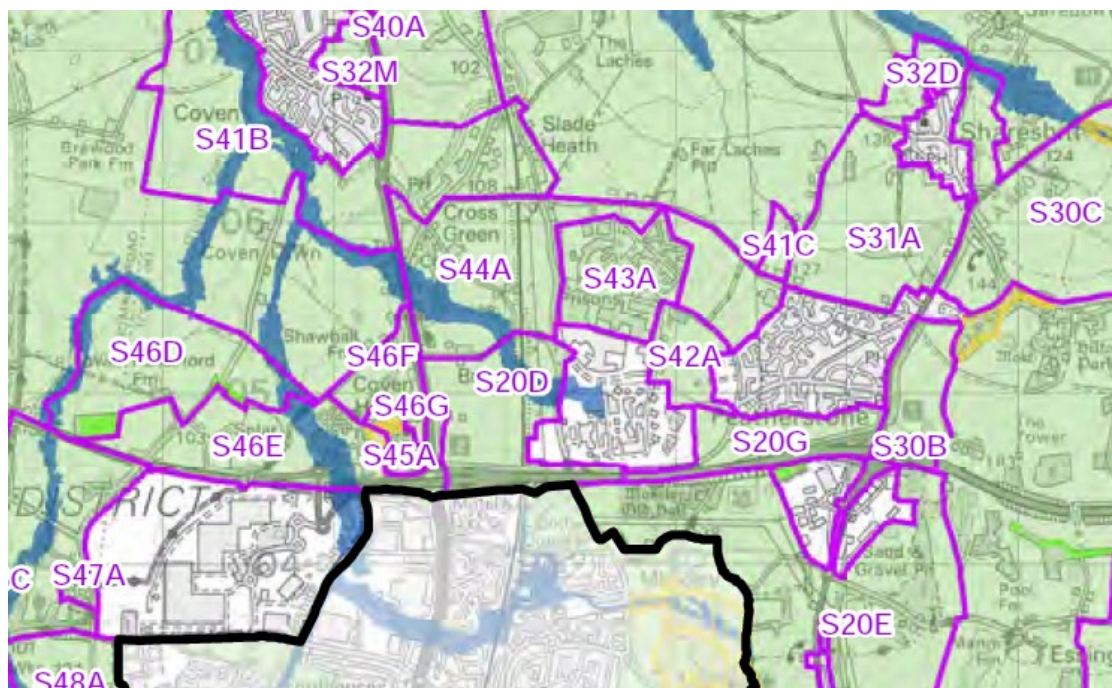


Image EDP 2.3: Extract from SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). Land Parcels S20D and S44A are shown on this extract.

2.32 These parcels are seemingly again split down into Parcels S44As1 and S44As2 and S20Ds1, and are overlaid with promoted sites which includes the site as 646a and 646b; see **Image EDP 2.4**.

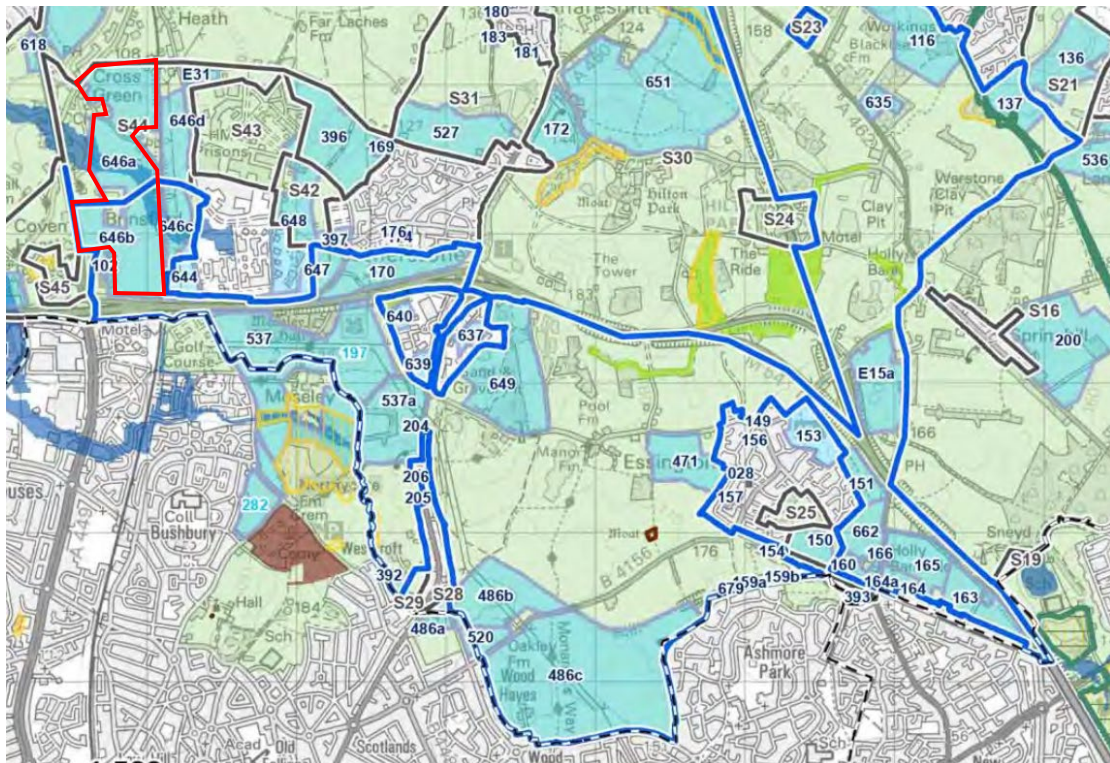


Image EDP 2.4: Extract from SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019). The approximate site boundary is overlaid.

2.33 Given EDP's field-based assessments in 2019 and 2021, EDP notes the following:

- Sub-parcel 646a (and the wider land parcel) is defined along its western edge by the Stafford Road (A449) dual-carriageway and the local minor vehicle route (New Road) to the north of the parcel;
- In combination, the land parcels do not extend across the West Coast Mainline railway which provides a robust, long-established defensible boundary to Sub-parcels 646a and 646b; and
- The fact that Sub-parcels 646a and 646b do not extend beyond the mainline is consistent with a clear definition of Green Belt boundaries for the following reasons:
 - The landscape character beyond the Mainline is more open and exposed in its visual and sensory perception;
 - The physical presence of the West Coast Mainline, and its associated earthworks, divorces Sub-parcel 646a from 646b;
 - The landscape character is degraded and has a larger field pattern;
 - Sub-parcel 646b is situated on higher landform; and

- Sub-parcel 646b is overlooked substantially by the Featherstone prison, and there is a prominent sense of development within this sub-parcel.
 - Additionally, S44 includes Sub-parcel E31, which is detached and remote to Sub-parcel 646a and enclosed by existing development, and is prominent in visual and sensory terms. For instance, Featherstone prison and an industrial/commercial activity with large-scale built form.
- 2.34 EDP consider that the West Coast Mainline railway provides a distinct barrier between Sub-parcel 646d and the wider parcel to which it currently belongs (i.e., S44), and that this unique relationship will significantly affect its ability to perform as effective Green Belt land. Further to this, the prominent sense of development east of the railway line is obviously lacking from within Sub-parcel 646a and the wider site area.
- 2.35 Given the foregoing, EDP advocates a site-specific assessment of Sub-parcel 646a, as the current inclusion of Sub-parcel 646d and E31 provides an inaccurate Green Belt rating for Parcel S44 which is not representative of its real contribution.
- 2.36 With consideration of Land Parcel S20, this parcel includes a significant number of sub-parcels across an expansive area of over 1,200ha, see **Image EDP 2.3**. Given EDP's field-based assessment, the following is noted:
- S20 represents a substantial land parcel, which has been determined by SSDC to be north and south of the M54 Motorway (with its associated earthworks and extensive landscape mitigation planting);
 - There is a more obvious influence of development east of the West Coast Mainline railway, than west of the railway link;
 - There is a far more substantial perception of urban development south of the M54 Motorway along the sub-urban areas of Wolverhampton, than north of the motorway; and
 - Landscape character is more intact around the western edge of the land parcel, with a greater perception of physical and landscape features creating durable elements, than the eastern and south-eastern areas of the land parcels. Here, landscape character has become degraded and influenced by the urban edge setting.
- 2.37 Overall, EDP propose the Green Belt Study 2019 adopts a similar approach to that of the Landscape Sensitivity Assessment 2019. Within this recent study, the site is recognised as Land Parcels SL47 and SL48; however, SSDC split S47 into two parcels, which are separated by the West Coast Mainline railway connection. SL47 is west of the railway line and S47s2 east of the route. The Landscape Sensitivity Assessment rates SL47 as having a “*moderate overall sensitivity to development*” and rates SL47s2 as having a “*low-moderate overall sensitivity to development*”.

- 2.38 This division of Land Parcel SL47 into two sections highlights that the railway is already recognised as a barrier which fundamentally influences the landscape sensitivity rating of the sub-parcels within. Given that this Landscape Assessment has yielded different sensitivity ratings for land either side of the railway, we propose that different contribution ratings would be achieved if the Green Belt Study assessed the same parcel in a similar way. Furthermore, it suggests that any assessment that does not regard land east of the railway as a separate parcel will lack specificity and will therefore be unreliable.
- 2.39 Given the foregoing, a site-specific assessment is recommended.

3. Published Landscape Character Assessments

- 3.1 A review of the relevant published Landscape Character Assessment enables judgements to be made on the performance of land against Green Belt Purpose 3. This is done by examining the Council's adopted baseline understanding of landscape character and comparing it against the current character of the site.
- 3.2 EDP undertook site visits by a Chartered Landscape Architects in 2019 and 2021 during which the current character of the site and locality were recorded, see EDP's Landscape Position Note (reference: **edp5393_r004**). This Position Paper does not comprise a Landscape and Visual Impact Assessment, as at this stage there is no refined development proposal to assess.

Staffordshire Landscape Character Assessment

- 3.3 The County-wide Landscape Character Assessment identifies the site as falling within the "Settled Plateau Farmland Slopes" Landscape Character Type. Given EDP's field-based assessment, the following landscape characteristics are noted as being common to the site:
- *"Gently rolling landform with ore pronounced slopes and undulations in places allowing medium to long distance views across to urban edges of surrounding landscapes;*
 - *The proximity of the urban edge strongly influences the general character of the landscape...busy, noisy areas dissected by major transportation corridors...; and*
 - *The encroachment of housing and industry urbanises the general character with the deterioration of landscape quality most noticeable at the immediate urban fringe".*
- 3.4 Reflecting on EDP's field-based assessment, the following is noted with regard to the open countryside surrounding the site area:

- *“Where nearby urban influences impact strongly on the landscape the landcover elements are in decline, with lanes now heavily used as through routes, and large scattered farms now diversifying; and*
- *The landscape there becomes one of an undistinguished character where no one element visually dominates but with an urban fringe feel due to adjacent industrial areas and to the introduction of non-traditional activities”.*

3.5 It is clear that the site is influenced by the extensive transportation corridors, including the West Coast Mainline, the M54 Motorway and the Stafford Road (A449) dual-carriageway, and the route of the canal.

3.6 Furthermore, the development of the former Royal Ordnance Factory (ROF) Featherstone strategic employment site to the east, and the construction of the consented Road Option 7 that forms an elevated crossing over the West Coast Mainline, and crosses the site to connect with the A449, will further influence the site.

3.7 The result of these facets of the local landscape is that the site has a functional relationship with these urbanising influences rather than the wider open countryside, which it feels almost divorced from due to the physical presence of roadways, railway line and substantial built form (HMP Featherstone and Wolverhampton City) forming the site boundary, or its immediate context.

4. EDP’s Green Belt Appraisal

4.1 As per **Section 2** of this Position Paper, SSDC’s South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019) contains a detailed methodology. SSDC used this methodology to assess the land parcel’s contribution to Green Belt role, as well as the level of harm for each sub-parcel, and in turn each site (known through promotion) for the likely harm from their removal for development.

4.2 This same methodology has been followed to provide a site-specific appraisal of the site. EDP’s appraisal of the site follows:

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

4.3 Whilst the site is situated on the edge of a large built-up area (Wolverhampton and its suburban areas), it is located within small hamlets and village areas (Coven Heath and Cross Green).

4.4 EDP recognises that the site is influenced by existing urban built form and features, not typical of the open countryside, or the ‘Settled Plateau Farmland Slopes’ Landscape Character Type. For instance, the presence of the M54 Motorway and West Coast Mainline railway line.

- 4.5 Consequently, the site has a less obvious relationship with the wider open countryside than the wider land parcel may do, especially to the east of the West Coast Mainline. Whilst the extensive hedgerow and mature landscape features, and mitigation planting associated with transportation corridors, encloses the site area and limits the openness with the wider open countryside, it is contained in part by a built-up area or small elements of development.
- 4.6 The bringing forward of development at the site, and re-alignment of the Green Belt, would modify the settlement edge of Wolverhampton. However, given the foregoing, this modification would not be unchecked and will not realise unrestricted sprawl. EDP concludes, that the site makes only a Moderate contribution to Green Belt Purpose 1.

Purpose 2: To Prevent Neighboring Towns from Merging

- 4.7 The site is only a minor component of the overall land parcel which has been appraised. The site is situated with a number of outlying towns within a relative distance. For instance, Penkridge and Stafford are approximately 7km and 13km north of the site. Cheslyn Hay and Cannock are approximately 6km and 8km to the north-east of the site. There are a number of small outlying small villages and hamlets within the intervening distance.
- 4.8 In this light, the site represents only a very minor component of the overall gap between these settlements. Furthermore, there is no intersibility between the site and these outlying settlements due to the combination of distance, landform, mature landscape features and physical presence of transportation corridors.
- 4.9 With consideration of the foregoing, EDP concludes, that the site makes No Contribution to prevent the merging of neighbouring towns (Green Belt Purpose 2).

Purpose 3: Assist in Safeguarding the Countryside from Encroachment

- 4.10 EDP undertook its own field-based assessment during April 2019 which, combined with information published within Staffordshire County Council's 'Planning for Landscape Change Supplementary Planning Guidance' Landscape Character Assessment, enables a much closer understanding of the site. Our field-based appraisal is helpful to reach conclusions about the acceptability, in landscape terms, of developing the site and its possible effects on local character.
- 4.11 The presence of settlements within the "Settled Plateau Farmland Slopes" Landscape Character Type is typical and the Staffordshire County Council's 'Planning for Landscape Change Supplementary Planning Guidance' recognises settlements as a typical influence in the landscape following 20th century urban expansion and infrastructure: "The proximity of urban edge strongly influences the general character of the landscape....busy, noisy areas, dissected by major transport corridors, railways, quarries and power lines..."

4.12 Further to this, the following incongruous features are noted within the site and within its immediate setting:

- The site has limited features of value with its hedgerows, hedgerow trees and topography probably being its most interesting aspect. However, existing boundary and internal vegetation is commonly poorly managed;
- There are a number of landscape detractors discernible from within the site, which are predominantly associated with the position of the site on the edge of Wolverhampton and the adjoining M54 Motorway to the southern boundary. The West Coast Mainline runs along the eastern boundary and the A449 roadway encloses the western site edge. In combination, these physical features and transient movement disrupt the tranquillity of the local area;
- The sense of existing development is common through the site, especially to the southern areas where there is a perception of existing residential development overlooking the site from the western edge;
- Where nearby urban influences impact strongly on the landscape the landcover elements are in decline, with lanes now heavily used as through routes and large scattered farms now diversifying;
- The landscape there becomes one of an undistinguished character, where no one element visually dominates but with an urban fringe feel due to adjacent industrial areas and the introduction of non-traditional activities; and
- It is clear that the site is influenced by the extensive transportation corridors, including the West Coast Mainline, the M54 Motorway and the Stafford Road (A449) dual-carriageway, as well as by the nearby HMP Featherstone, ROF strategic employment site and the new Road Option 7. These features provide significant and prominent physical elements which sandwich and enclose the site.

4.13 Consequently, EDP considers that the site makes only a limited contribution to the key characteristics of the landscape of the “*Settled Plateau Farmland Slopes*” Landscape Character Type. Additionally, there are a number of landscape detractors discernible from the site. These detractors are predominantly associated with the position of the site on the edge of Wolverhampton and the influence of urban development.

4.14 The site is sandwiched between significant transportation corridors and their associated curtilages. In the main, the site is experienced as being on the edge of an existing settlement, rather than being divorced from it, in the open countryside. In summary, EDP considers that the site only makes a Moderate contribution to this Green Belt Purpose.

Purpose 4: Preserve the Setting and Special Character of Historic Towns

- 4.15 With consideration of the site's contribution to the function of this Green Belt Purpose, EDP notes that there are many conservation areas within the South Staffordshire Green Belt and also in neighbouring districts adjacent to the site (within the City of Wolverhampton). However, these areas are not classed as 'historic towns'.
- 4.16 The only area within this criterion would relate to settlements situated a lengthy distance away and given the intervening landform and mature landscape features, there is no indivisibility with the site. For instance, Stafford, Walsall, Wombourne, the historic core of Wolverhampton, or Bridgnorth in Shropshire.
- 4.17 Therefore, it is considered that in reality this purpose would have very little relevance when assessing the site. Hence, EDP considers that the site makes No Contribution to this Green Belt Purpose.

Purpose 5: Assist Urban Regeneration, by Encouraging Recycling of Derelict and Other Urban Land

- 4.18 With regard to Purpose 5, "to assist in urban regeneration by encouraging the recycling of derelict and other urban land", EDP considers that every land parcel would perform the same when measured against it.
- 4.19 Additionally, it is noted that there has been much consideration across the country as to whether there is value in performing an assessment against this purpose. Planning and Application Advisory Service (PAS) Guidance 1 suggests that if the process has been properly followed, the ability to accommodate development within the urban area will have been fully explored prior to considering land within the Green Belt.
- 4.20 In the case of the West Midlands Green Belt, although the Green Belt was established to stop major urban areas and also smaller towns and cities from merging together, it has clearly played a key role in assisting the urban regeneration of the Birmingham conurbation and the reuse of brownfield land elsewhere outside of the Green Belt. Consequently, every land parcel would perform the same when measured against it, therefore adding no value to the overall assessment.
- 4.21 Given the foregoing, EDP considers that the site makes a Strong Contribution with regard to Green Belt Purpose 5.

Comparative Summary (Part 1)

- 4.22 Comparison of the site against S44 and S20 is summarised in **Table EDP 4.1**, which demonstrates that the site would make a weak performance against the purposes of the NPPF.

Table EDP 4.1: Comparison Scoring for the Site against the Green Belt Purposes (i-v) as Appraised by SSDC's South Staffordshire Green Belt Study (Stage 1 and 2 Report, July 2019).

The Site					
Appraiser:	Purpose 1: Checking the unrestricted sprawl of large built- up areas	Purpose 2: Prevent neighbouring towns from merging	Purpose 3: Assist in safeguarding the countryside from encroachment	Purpose 4: Preserve the setting and special character of historic towns	Purpose 5: Assist urban regeneration, by encouraging recycling of derelict and other urban land
SSDC (S44 Land Parcel)	Strong Contribution	Moderate Contribution	Strong Contribution	Weak/No Contribution	Strong Contribution
SSDC (S20 Land Parcel)	Strong Contribution	Moderate Contribution	Strong Contribution	Weak/No Contribution	Strong Contribution
EDP (the site)	Moderate Contribution	No Contribution	Moderate Contribution	No Contribution	Strong Contribution

- 4.23 In summary, given our site-specific appraisal, EDP is firmly of the opinion that the site is a lower functioning area of Green Belt than SSDC assessed for Land Parcels S44 and S20.

Harm to the Green Belt Through Site Removal (Part 2)

- 4.24 Harm is defined on page 62, paragraph 6.23 onwards of the SSDC South Staffordshire Green Belt Study – Stage 1 and Stage 2 Report, July 2019. The methodology arrives at an overall score rating by considering that the impact of releasing the site from the Green Belt will affect Green Belt boundaries and the strength/integrity of the adjacent Green Belt.
- 4.25 SSDC considers that the harm of releasing the sub-parcels within land parcel S44 and S20 ranges from High to Very High. With regard to the site, EDP notes the following relative to each Green Belt role.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 4.26 EDP is firmly of the opinion that the release of the site from the Green Belt is unlikely to significantly weaken the function or integrity of the wider Green Belt north of Wolverhampton. The site is well contained by mature, robust landscape features which limit intervisibility with the wider Green Belt outwards and is enclosed by substantive vehicle corridors including a Motorway, dual-carriageway and a branch of the West Coast Mainline railway link.
- 4.27 The eastern, southern and western edges of the site are more robust and defensible than the current make-up of the settlement edge surrounding Cross Green; however, this

settlement edge does not project into the open countryside and is contained by mature landscape features and minor local roadway and in part, the Staffordshire and Worcestershire Canal.

- 4.28 The development of the site through the enhancement of the existing landscape fabric within the site, and creating landscape and Green Infrastructure to the northern and western site boundaries, would enable a more succinct and contained settlement.

Purpose 2: To Prevent Neighboring Towns from Merging

- 4.29 As aforementioned, the site provides no contribution to this role. Should the release of the site be undertaken, development would modify the settlement edge of Wolverhampton. However, there would be perceptual reduction in the existing gap between the site and those outlying settlements and the towns of Stafford, Cannock and Cheslyn Hay.

Purpose 3: Assist in Safeguarding the Countryside from Encroachment

- 4.30 The main vehicle routes including the M54 Motorway, and the extensive development at Featherstone prison, represents a concentrated area of urban development forming the backdrop to the site. The site is not previously developed land and would be considered new building in the Green Belt. However, the site lies on land that is directly adjacent to multiple neighbouring residential built form and curtilages, as well as these substantial forms of development. Invisibility from the site across the wider open countryside is significantly limited by existing robust hedgerows, hedgerow trees and small stands of woodland within, and adjoining, the site.
- 4.31 However, EDP notes that it is clearly inferable from the likely future development that the site would be a mixture of residential built form and public open space. The creation of informal Public Open Space (POS) and semi-natural open space within the future scheme would maintain a sense of enclosure within the site, and would enhance existing robust boundaries, especially along its periphery.
- 4.32 EDP considers that given the foregoing, the development of the site would not diminish the openness of the countryside beyond the site's edge. These physical features would contain the urban influence from the modified settlement edge through an appropriately designed site layout.

Purpose 4: Preserve the Setting and Special Character of Historic Towns

- 4.33 As aforementioned, the site provides no contribution to this role. Therefore, should the site be released and developed in the future, there would be no physical or perceptual/sensory effect on the special character of historic towns.

Purpose 5: Assist Urban Regeneration, by Encouraging Recycling of Derelict and Other Urban Land

4.34 It is agreeable that the release of the site from the Green Belt could be harmful to Green Belt Role 5. However, based on EDP site visits during 2019, it is anticipated that there would be very few areas of derelict or existing developed land within the northern extent of Wolverhampton, that would be currently (or perceivably) available for redevelopment.

4.35 For this reason, the restriction of development from within the Green Belt, would not facilitate the development of derelict or other urban land within the immediate northern suburban areas of Wolverhampton, or the outlying smaller settlements north of the city in South Staffordshire.

4.36 In summary, given all the foregoing, EDP considers that the release of the site for future development would lead to a less substantial harm than appraised by SSDC. EDP is firmly of the opinion that the resultant harm would be Low-Moderate in nature. This level of harm is defined as:

“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.”

4.37 In summary, given our site-specific appraisal, EDP is firmly of the opinion that the site is a lower functioning area of Green Belt than SSDC assessed for Land Parcels S20 and S44. EDP’s site-specific assessment (contained above) considers that the release of the site would lead to only a Moderate level of harm to the function of the Green Belt.

5. Boundary Resilience

5.1 With further consideration of ‘Chapter 13: Protecting Green Belt land’ of the Revised NPPF (July 2021), it is possible to review the site in a wider sense (relative to the Revised NPPF) to deliver a well-rounded and robust opinion of the site’s release from the Green Belt.

5.2 Paragraph 142 states the following:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of developments...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.”

5.3 Paragraph 143 states the following (pertinent to this Green Belt review):

“When defining Green Belt boundaries, plans should:

...

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period...

...

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

5.4 With regard to the revised NPPF paragraph 143, it is recognised that there are benefits in *“using physical features that are readily recognisable and likely to be permanent”* for the re-alignment of Green Belt boundaries. Ideally, these features are clearly defined on the ground and perform a physical and/or visual role in separating town and countryside.

5.5 It is EDP’s firm opinion that robust, defensible boundaries are key to feasible Green Belt release, providing a fixed and permanent edge for re-aligning the Green Belt so that it is not altered in future years. In some cases, this purposeful act of realignment of Green Belt to these features can result in less incongruous development edges than can be seen currently in some parts of England.

5.6 Furthermore, such a consideration ensures that Local Authorities can identify the most essential Green Belt land area and prioritise land parcels which could be legitimately released from the Green Belt with the minimal amount of harm.

5.7 The site is inherently enclosed and limited by strong robust physical features, which are all long established and permanent. These include major vehicular routes such as the M54 Motorway, the Stafford Road (A449) dual-carriageway, and the West Coast Mainline railway link to the city centre.

5.8 The site, if developed as per the Development Framework Plan at **Appendix EDP 1**, is sandwiched between all of these robust physical features which represent potentially defensible, durable edges for Green Belt re-alignment, which would satisfy the requirements of the Revised NPPF paragraph 143: *“When defining Green Belt boundaries...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

5.9 Consequently, EDP considers that the realignment of the Green Belt to reflect the quantum of the site would be sustainable and appropriate in longevity. This results primarily from the clearly demarcated boundary features, the enclosed nature of the site and the

consequential limitation in landscape and visual effects through the utility, and partial enhancement of permanent and physical features within the site.

- 5.10 In conclusion, the boundaries of the site are not only demarcated by visible features, but these features are robust and durable and have a high degree of permanence due to their status.

6. Conclusions

- 6.1 Through a preliminary site-specific assessment, this Position Paper has looked at key considerations for the removal of the site from the West Midlands Green Belt.
- 6.2 The development of the site will impact on the openness of the Green Belt at a Local level. However, due to the large scale of the designation, this would not significantly undermine the openness of the wider coverage of the West Midlands Green Belt.
- 6.3 As a result of this site-specific preliminary Green Belt review, it is possible to define how redevelopment could conserve and enhance the landscape, whilst utilising readily available defensible and durable boundaries around which to redefine the Green Belt. The site has the potential to provide permanent, defensible boundaries to maintain a sense of openness in the wider Green Belt area.
- 6.4 Overall, it is considered that the site *could* be released for development, without significant harm to the function of the Green Belt north of Wolverhampton, retaining the relative openness and performance of the wider Green Belt within this region of South Staffordshire.
- 6.5 For these reasons, it is considered that the site could reasonably be removed from the Green Belt and developed in accordance with an appropriately designed site proposal, which is sensitive and responsive to its environment, without overall harm to the integrity of the Green Belt.



Appendix EDP 1
Development Framework Plan (October 2021)



KEY

- SITE BOUNDARY (TBC)
63.76 HA
157.56 ACRES
- ↗ POTENTIAL SITE ACCESS
VIA BRINSFORD LANE, NEW ROAD AND
OLD STAFFORD ROAD
- PROPOSED HIGH DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (50 DPH)
NDA 5.09 HA / 12.58 ACRES
UP TO 255 DWELLINGS (AT 50 DPH)
- PROPOSED MEDIUM DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (40 DPH)
NDA 7.44 HA / 16.37 ACRES
UP TO 300 DWELLINGS (AT 40 DPH)
- PROPOSED LOW DENSITY RESIDENTIAL
DEVELOPMENT PARCELS (35 DPH)
NDA 18.1 HA / 44.72 ACRES
UP TO 435 DWELLINGS (AT 35 DPH)
- PROPOSED CENTRAL VILLAGE HUB
0.77 HA / 1.9 ACRES
- POTENTIAL LOCATION FOR PRIMARY SCHOOL
- 2.05 HA / 5.08 ACRES
- POTENTIAL PARKING FOR RAIL HALT
- 1.47 HA / 3.6 ACRES (UP TO 500 SPACES)
- POTENTIAL ROUNDABOUT ACCESS VIA
STAFFORD ROAD
- PROPOSED DISTRICT ROAD MOVEMENT
- PRIMARY MOVEMENT ROUTE
(INCORPORATING CYCLE AND PEDESTRIAN MOVEMENT)
- SECONDARY MOVEMENT ROUTE
- TERTIARY LINK ROAD MOVEMENT
- PRIVATE LANE MOVEMENT
- EXISTING RAIL MOVEMENT PROVIDING ACCESS TO
NEARBY URBAN CENTRES
- PROPOSED NEW RAIL HALT STOP
- ✳ POTENTIAL PEDESTRIAN CROSSING POINT (TBC)
- PUBLIC RIGHT OF WAYS
- POTENTIAL PEDESTRIAN ROUTES
WITHIN DEVELOPMENT
- EXISTING VEGETATION
- ★ PROPOSED STRUCTURAL PLANTING PROVIDING
A REDUCTION IN ACOUSTIC DISTURBANCE
- ★ PROPOSED WETLAND WOODLAND PLANTING
- ORNAMENTAL PLANTING
- COMMUNITY ORCHARD PLANTING
- ★ NEIGHBOURHOOD EQUIPPED AREA OF PLAY
- ★ LOCALLY EQUIPPED AREAS OF PLAY
- ★ AREA OF NATURAL PLAY
- ✳ COMMUNITY TRIM TRAIL ROUTE
- COMMUNITY ALLOTMENT SPACES
- CONFIRMED EXTENTS OF FLOOD LINE
- ★ SUSTAINABLE URBAN DRAINAGE (TBC)

- ### KEY PRINCIPLES
1. POTENTIAL ACCESS VIA NEW ROUNDABOUT AND DISTRICT ROAD OFF EXISTING STAFFORD ROAD (A449);
 2. POTENTIAL ACCESS VIA BRINSFORD LANE, NEW ROAD AND OLD STAFFORD ROAD;
 3. PRIMARY RESIDENTIAL MOVEMENT PROVIDING GREEN FORMS OF MOVEMENT;
 4. SECONDARY MOVEMENT ROUTES PROVIDING ACCESS TO LARGER PARCELS OF DEVELOPMENT;
 5. TERTIARY MOVEMENT ROUTES PROVIDING ACCESS TO SMALLER CLUSTERS OF DEVELOPMENT
 6. PRIVATE LANES WITH OUTWARD FACING DWELLINGS PROVIDING PASSIVE SURVEILLANCE OVER PROPOSED OPEN SPACE.
 7. POTENTIAL LOCATION FOR PROPOSED PRIMARY SCHOOL;
 8. POSSIBLE LOCATION FOR A CENTRAL VILLAGE HUB PROVIDING OPPORTUNITIES FOR RETAIL AND COMMUNITY USES;
 9. NEWLY PROPOSED RAIL HALT STATION PROVIDING SUSTAINABLE FORMS OF MOVEMENT;
 10. A SERIES OF LANDSCAPED COMMONS OFFERING LOCATIONS FOR EQUIPPED AREAS OF PLAY AND SPORTING PURSUITS;
 11. NEWLY CREATED "CANALSIDE WALK" LINEAR PARK PROVIDING A LANDSCAPED BUFFER TO THE EXISTING CANAL NETWORK PROVIDING LEISURE AND SOCIAL OPPORTUNITIES FOR RESIDENTS;
 12. COMMUNITY ALLOTMENTS TO BENEFIT NEW AND EXISTING RESIDENTS;
 13. PLANTED COMMUNITY ORCHARD RETURNING THE AREA TO ITS HISTORIC LAND USE;
 14. PROPOSED LOCATION FOR COMMUNITY TRIM TRAIL PROVIDING OPPORTUNITIES FOR COMMUNITY EXERCISE AND SOCIAL INCLUSION;
 15. MAXIMUM RETENTION OF EXISTING VEGETATION AND ECOLOGY ON SITE;
 16. WETLAND WOODLAND PLANTING AIDING BIO-DIVERSITY AND ECOLOGY ON SITE;
 17. NEW STRUCTURAL WOODLAND PLANTING TO CREATE AN ACOUSTIC BARRIER TO EXISTING AND PROPOSED MOVEMENT INFRASTRUCTURE.
 18. SERIES OF THEMED GREENWAYS HELPING TO RETAIN EXISTING ECOLOGY WITH OPPORTUNITIES FOR ENHANCED PLANTING AND OPEN EXPANSES OF AMENITY GREENSPACE;
 19. MAXIMUM PROVISION FOR PEDESTRIAN MOVEMENT TO PROVIDE MAXIMUM PERMEABILITY THROUGHOUT THE DEVELOPMENT; AND
 20. UTILISATION OF EXISTING SITE LOW POINTS FOR SUSTAINABLE URBAN DRAINAGE SOLUTIONS.



CROSS GREEN VILLAGE, FEATHERSTONE | DEVELOPMENT FRAMEWORK PLAN