

South Staffordshire Regulation 19 Publication Document

Statement of Representations

Land off Orton Lane and land west of
Strathmore Crescent, Wombourne

Submitted on behalf of Bellway Homes Ltd

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Client

Our reference
BELQ3007

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1. Introduction

- 1.1 These representations are made on behalf of Bellway Homes Limited (Bellway), in response to the South Staffordshire Local Plan Review (LPR) Regulation 19 consultation.
- 1.2 Bellway welcome the opportunity to make representations on the final draft version of the Local Plan in terms of soundness and legal compliance.

The Sites

- 1.3 Bellway is promoting two sites at Wombourne:
 - Land off Orton Lane, Wombourne
 - Land west of Strathmore Crescent, Wombourne

Land off Orton Lane, Wombourne

- 1.4 Land off Orton Lane is a 3.6ha site to the north of Wombourne (Site Ref: 416). It represents a sustainable and deliverable residential opportunity for a minimum of 79 dwellings, public open space and associated infrastructure.
- 1.5 Along with land to the north (Site Ref: 416a, which is promoted separately by St Philips), the site is proposed to be allocated for a minimum 79 new homes (draft policy SA5, where it is referred to as 'Land off Orton Lane'). Bellway's southern extent of the proposed allocation is currently safeguarded in the adopted Site Allocations Document, as is the north western extent of the allocation, with the remaining north eastern extent still located within the Green Belt.
- 1.6 Development of the site at Orton Lane will help to meet the short-term housing need for the village. The site will deliver much needed affordable housing and open space and a more robust settlement edge than currently offered, and could provide linkages to land to the west (outlined below). There are no constraints to the development of the site.
- 1.7 An *opportunities and constraints plan* (**Appendix 1**) and *framework plan* (**Appendix 2**) has been prepared for the site. These plans demonstrate that around 45 homes can be delivered at the site. We will continue to work with St Phillips to ensure the masterplans for both sites are coordinated and capable of working together. This will include connections between the two sites, as shown on the opportunities and constraints plan.

Land west of Strathmore Crescent, Wombourne

- 1.8 Bellway controls additional land beyond Orton Lane at Wombourne, to the west of Strathmore Crescent (Site Ref: 708), it adjoins the western boundary of the Orton Lane site (Site Ref: 416). The site has the potential to deliver an additional 40-50 homes, forming an extension of the proposed allocation off Orton Lane. The site would be accessed via the proposed Orton Lane allocation and could offer a new link through to the adjacent railway walk, a *site location plan* enclosed at **Appendix 3**.

- 1.9 As we discuss later, the small scale nature of this site represents a more suitable and sustainable opportunity for growth at Wombourne than the land off Billy Buns Lane and Gilbert Lane (Site Ref: 463 and 284) proposed allocation. It has a more limited impact on the Green Belt given its scale alongside its physical and visual self-containment. The South Staffordshire Railway Walk situated to the west and which provides a permanent, defensible boundary for the site, and further development to the east.
- 1.10 Together with the land to the proposed off Orton Lane, the land represents a comprehensive solution to meeting Wombourne's needs in a single location, which is very well defined by its boundaries.

Bellway Homes

- 1.11 Evolving from a local family business to a FTSE 250 major PLC, Bellway builds exceptional quality new homes throughout the UK, delivering almost 11,000 new homes across the UK in the last year. They are an established five star housebuilder as a result of their emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.
- 1.12 Bellway, with their consultant team, have and will continue to seek to work closely with the Council, statutory consultees and other stakeholders through the development plan process, and as the housebuilder for the site with a strong track record for delivery, will ensure careful attention is given to viability and costs in plan-making.
- 1.13 Bellway welcome the opportunity to further engage with the LPR through the Regulation 19 consultation. We respond to the Publication Plan at **Section 2** of these representations and provide a summary at **Section 3**. The statement provides further context to responses set out in the consultation forms which are also submitted on behalf of Bellway Homes.

Support for the Plan

- 1.14 Bellway support the inclusion of the land off Orton Lane and its form as proposed in the draft plan. It is considered that the land west of Strathmore Crescent would complement the existing allocation by utilising shared infrastructure and access to Orton lane, and by linking both sites to the South Staffordshire Way.
- 1.15 Bellway do however have concerns regarding the anticipated delivery rates for Cross Green (though we do not disagree with its principle) and the principle of the proposed allocation on land off Billy Buns Lane and Gilbert Lane. The plan should anticipate less delivery from both sites before 2039 to de-risk the plan and to remedy this identify land elsewhere to ensure the District's needs are met in full, including allocating land at Strathmore Crescent, Wombourne.

2. Response to Strategic Draft Policies

Cross boundary issues and the duty to cooperate, and Strategic Objectives

- 2.1 It is welcomed that the LPR acknowledges from the outset and at paragraph 3.6-3.7, the opportunities section of Table 2 SWOT analysis, and the strategic objectives, and a theme throughout the plan, that unmet housing needs from the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is a 'key cross boundary issue' to be addressed through the plan.
- 2.2 Bellway support the vision and strategic objectives set out. Strategic Objective 2 in particular references the need to meet the housing and employment needs of the District whilst making a proportionate contribution towards the unmet needs of the GBBCHMA.
- 2.3 The objectives for high quality housing to meet a wide range of needs and provide beautiful and sustainable places where people want to live are welcomed. The LPR notes the lack of brownfield development sites available within the District, and the requirement for a careful release of suitable Green Belt land to meet housing need.
- 2.4 The strategic objectives of the LPR are sound.

Policy DS1: Green Belt

- 2.5 Whilst we have no in principle concern with draft policy DS1, the LPR should be drafted as though it is being read once the plan is adopted. The fifth paragraph may therefore need amendment to reflect that the Green Belt boundaries have already been altered, rather than 'will be'.
- 2.6 We would recommend the following modification at draft policy DS1 paragraph 5 to reflect this:

*"The Green Belt boundary ~~will be~~ **has been** altered through this Plan to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5 and SA7" ...*

Policy DS2: Green Belt Compensatory Improvements

- 2.7 NPPF paragraph 142 states that the removal of land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. Planning practice guidance clarifies that this could include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity and habitats, new or enhanced walking and cycling routes, and improved access to new or existing recreational and playing field provision.
- 2.8 Policy DS2 reflects this approach and provides sufficient flexibility to agree a contribution if no specific scheme can be identified.

Policy DS4: Development Needs

- 2.9 The development needs of South Staffordshire include a proportion of the unmet housing need of the GBBCHMA. The GBBCHMA is made up of 14 different authorities, including Birmingham and the four Black Country authorities. There is no question that there is a significant unmet need arising from the GBBCHMA:
- There is a remaining unmet need of **6,302 homes up to 2031** from the adopted *Birmingham Development Plan* (January 2017), as per the *GBBCHMA fourth position statement addendum* (December 2021).
 - Based on their own assumptions the Black Country has an unmet need of **36,819 homes up to 2039** (the *Black Country Urban Capacity Review Update* (May 2021)). The previous draft of the Black Country Plan proposed allocations to reduce this to circa 28,000 homes, however the plan has now been abandoned and each authority will be preparing its own plan.
 - Birmingham has now commenced a review of its plan. The Issues and Options version is currently published for consultation – that indicates there is a substantial shortfall from the city of circa **78,000 homes up to 2042**.
- 2.10 Given the significant remaining shortfall arising in the GBBCHMA and South Staffordshire’s clear functional relationship with the wider HMA (demonstrated by its travel to work patterns, and transport links with Birmingham and the Black Country), Bellway are therefore supportive of the plan’s proposed contribution to the GBBCHMA’s unmet need. The scale of the contribution and the Council’s approach is justified by the *Greater Birmingham and Black Country Strategic Growth Study* (February 2018).
- 2.11 Nearly all of South Staffordshire’s villages are surrounded by Green Belt, therefore it is inevitable that the District will need to release Green Belt to meet its needs and those of the wider GBBCHMA. As such exceptional circumstances have been clearly demonstrated to alter Green Belt boundaries through the draft plan, in accordance with NPPF paragraph 140.
- 2.12 The ongoing work with neighbouring authorities to agree the contribution to the shortfall is well evidenced, as such the Council has satisfied the duty to cooperate.
- 2.13 The approach to making a contribution to the wider GBBCHMA unmet needs is therefore positively prepared, based on effective joint working, and is consistent with national policy.

Policy DS5: The Spatial Strategy to 2039

- 2.14 The policy sets out that growth will be directed towards the most accessible and sustainable locations, whilst also ensuring that the natural and historic environment is maintained and enhanced to protect local distinctiveness.
- 2.15 Wombourne is identified as a ‘Tier 2 Settlement’ within the policy. The village benefits from a host of local services and access to public transport, with close proximity to

Dudley and Wolverhampton. Whilst we understand to some degree the rationale underpinning the LPR's settlement hierarchy, its rigid approach does not allow for making judgements on settlements such as Wombourne which has a significant employment offer within Wombourne which is walkable and cyclable and not reliant on public transport. At 43.6ha Wombourne has the **third highest provision of employment land in South Staffordshire** after Penkridge and Codsall / Bilbrook. This is significantly more employment land than other proposed Tier 1 settlements such as Cheslyn Hay / Great Wyrley (30.3ha).

- 2.16 Beyond this Wombourne also benefits from a frequent bus service (every 20 minutes) to Wolverhampton St Georges, just a 20-minute bus journey, therefore rail access is also nearby. Combined with its large retail, Wombourne's employment provision and public transport accessibility clearly justifies it being a Tier 1 settlement.
- 2.17 Growth in Wombourne will be delivered through a combination of new allocations and the release of safeguarded land, such as that at Orton Lane, including the release of Green Belt land, particularly in the north eastern part of the village. The Plan recognises that this area benefits from good proximity to a variety of services and facilities, including regular public transport, as well as "*relatively low Green Belt harm compared to other areas in the district*". It is therefore capable of accommodating more than the level of growth identified for it, including Bellway's land west of Strathmore Crescent, which is discussed further below.
- 2.18 In addition to Wombourne's level in the settlement hierarchy, Bellway also have concerns regarding the spatial strategy's reliance on land at Cross Green, which we comment on in response to draft policy SA2.

Policy SA2: Cross Green

- 2.19 We have no objection in principle to the proposed allocation at Cross Green, however we have some concerns regarding the scale of delivery anticipated for the proposed plan period given infrastructure delivery.
- 2.20 Firstly, there are concerns regarding the access road to ROF Featherstone and the associate costs and the potential impacts on Cross Green's viability and delivery trajectory. The IDP now estimates the cost of delivering the access road at £14.4m-£19m, to be funded via Staffordshire County Council and developer contributions. Evidence should be provided as to how this will be funded. The only funding evidence to date is reference to £1.5m of Growth Deal funding being made available via the Stoke-on-Trent and Staffordshire Local Enterprise Partnership.
- 2.21 Secondly, mindful of the scale of infrastructure delivery at the site, no detailed evidence has been provided to support the site's proposed quantum of housing growth (1,200 new homes).
- 2.22 With the expectation set out in the LDS that the plan will be adopted in December 2023, it is assumed an application will be submitted by summer 2024, at the earliest. *Lichfields' Start to Finish report (February 2020)* identifies that the average lead in time for applications of Cross Green's scale from validation of an application to first delivery is **8.4 years**. This would see first completion in **winter 2033**.

2.23 The Lichfield’s report indicates it is reasonable to assume 160 dwellings per annum (dpa) to be delivered on sites of Cross Green’s scale. This is qualified by *Stafford Borough’s Lead-in Times and Built Rate Assumptions Topic Paper (October 2022)*, which provides evidence for lead in times for sites in Stafford’s neighbouring authorities. Stafford’s only neighbouring authority to provide evidence to the topic paper for sites of 501 homes or more, Lichfield District (who are also a neighbour to South Staffordshire), indicate it is reasonable to assume a ceiling of 150dpa on sites of that scale. Applying 160 dpa on Cross Green from 2031/32 would see the site deliver 1,120 homes, approx. 760 homes less than the proposed allocation.

2.24 Based on the above assumptions the below delivery is anticipated:

2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	Total
40	160	160	160	160	160	160	1,000

2.25 In total, it is therefore assumed that Cross Green will only deliver **around 1,000 new homes** before the end of the plan period, 200 less than the policy assumes.

2.26 The Council should therefore consider preparing further evidence to justify the scale of growth proposed for Cross Green, or whether its scale should be reduced and some of its growth delivered elsewhere in the District (such as Bellway’s site at Strathmore Crescent).

2.27 If the delivery rates cannot be evidenced than the following modification to draft policy SA2 at part a) will be necessary:

2.28 “a) A minimum of ~~1,200~~**1,000** homes”

Policy SA5: Housing Allocations

Land off Orton Lane (Housing Allocation 416)

2.29 We continue to support the principle of the release of the safeguarded land at Orton Lane for allocation for housing growth. The site remains suitable, available and achievable, in accordance with Paragraph 68 of the NPPF. It was confirmed through the *Housing Site Selection Topic Paper (2021)* that the “*site’s assessment process has revealed no unmitigable constraints to the delivery of the safeguarded land in Wombourne*”. This was also confirmed through the examination of the SAD as recently as 2018.

2.30 Initial baseline technical work has demonstrated that the site can come forward for development in the short term, so can contribute to the Council being able to maintain their five year housing land supply, and there are no constraints which would limit this. The enclosed framework plan (Appendix 2) demonstrates how the site can be delivered, responding to its constraints. That includes:

- Retaining trees around the site’s boundary and planting additional trees and landscaping

- Delivering a policy compliant level of open space, with the majority of open space at the south eastern extent of the site so it is accessible to both new and existing residents
- Creating a new pedestrian recreational route through the site
- Focusing landmark buildings towards the access to the site
- locating the attenuation pond at the site's lowest point

2.31 It is Bellway's intention to commence pre-application discussions with the Council early in 2023 with a view to submitting an application before summer.

2.32 Bellway control the southern extent of the proposed allocation, St Phillips control the northern extent. Although there will be separate applications made by each party, we are committed to continuing to work together to ensure there is a coordinated approach to delivery.

Land off Billy Buns Lane and Gilbert Lane (Site Refs: 463 & 284)

2.33 Land off Billy Buns Lane and Gilbert Lane (Site Refs: 462 and 284) are proposed as allocations for a minimum of 223 dwellings. Bellway consider that their additional land to the west of Strathmore Crescent (Site Ref: 708) is a more sustainable and suitable option for meeting Wombourne's (and the wider District's) housing needs.

2.34 Firstly, the Council's own evidence (*LUC Landscape Sensitivity Study (2019)*) demonstrates that land west of Strathmore Crescent is less visually sensitive (moderate sensitivity) than land off Billy Buns Lane and Gilbert Lane (moderate-high). This is because the landscape to the east of Wombourne is influenced by the adjacent historic landscape and areas such as the area around the Himley Hall Registered Park and Garden. This is not an issue for land to the west of Wombourne, such as land to the west of Strathmore Crescent.

2.35 EDP's *Landscape and Green Belt Review (2021)* (**Appendix 4**) shows that the site has no landscape features of note and there are features present which limit the site's sensitivity. Reflecting this the site is considered to be of low-moderate sensitivity. Furthermore the site presents an opportunity to create a new and permanent settlement edge with a defensible boundary to the wider countryside to the north.

2.36 Secondly, the Council's Green Belt Review (*LUC Green Belt Study (2019)*) also shows that land west of Strathmore Crescent is located in a parcel which represents less Green Belt harm (moderate-high) than land off Billy Buns Lane and Gilbert Lane (very high). Supporting this, the enclosed *EDP Landscape and Green Belt Review (December 2021)* (**Appendix 4**) demonstrates that the three hectares of land to the west of Strathmore Crescent provide a **considerably lower** contribution to Green Belt purposes than land off Billy Buns Lane and Gilbert Lane. As land west of Strathmore Crescent has not been tested under the sub-parcel scenarios to confirm this position, the *EDP Green Belt Assessment* applies the same methodology as the *LUC Green Belt Study (2019)*. The main distinctions are the presence of adjoining residential development at land west of Strathmore Crescent, where it would read as an extension to the existing

residential area, and presence of substantial boundary landscaping physically containing the site to the south and west.

- 2.37 Land west of Strathmore Crescent's lower Green Belt harm is influenced by fact it is visually and physically well contained being bound along its western edge by the railway walk, residential development to the east and south.
- 2.38 Thirdly, there is no reflection in the evidence base regarding the constraints at land off Billy Buns Lane and Gilbert Lane, such as electricity pylons which will either significantly comprise the net developable area of the site or viability if the wires are to be buried under the ground. The net developable area is likely to be further compromised by noise impacts from the adjacent A449. Without further evidence being provided it is unlikely the site will deliver the capacity identified in the plan.
- 2.39 In addition, there are clear synergies of delivering land west of Strathmore Crescent given its location adjacent to the proposed allocation and already safeguarded site at Orton Lane – it would support sustainable patterns of development as per NPPF paragraph 142.
- 2.40 Policy SA5 should therefore be modified to reduce the capacity of land off Billy Buns Lane and Gilbert Lane to reflect its constraints and land west of Strathmore Crescent should be added into the policy for a minimum capacity of around 40 homes.

3. Response to Draft Development Management Policies

Policy HC1: Housing Mix

- 3.1 Bellway support the core principle of these policies, to create “*mixed, sustainable and inclusive communities*”. However, the prescriptive minimum housing requirements may risk providing the wrong type of housing for Wombourne residents and potentially impact on development viability and delivery.
- 3.2 As such, the policy should be reconsidered to ensure it accords with paragraph 82 of the NPPF and the need for policies to “*be flexible enough to accommodate needs not anticipated in the plan*” and to “*enable a rapid response to changes in economic circumstances.*”
- 3.3 The policy should take a more flexible approach on housing mix to ensure it is consistent with NPPF paragraph 82’s need for policies to “*be flexible enough to accommodate needs not anticipated in the plan*” and to “*enable a rapid response to changes in economic circumstances.*” It also needs to recognise that housing needs vary within different areas and on a site-by-site basis. The policy must ensure that the viability of development proposals is protected whilst providing an appropriate housing mix for the site location and local market. In addition to evidence such as the latest Housing Market Assessment, it would be appropriate for the Council to refer to other evidence including current demand.
- 3.4 We would recommend the following modifications to the third paragraph of policy HC1 to ensure it is consistent with NPPF paragraph 82:

*“On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing ~~must~~ **should** include a minimum of 70% of properties with 3 bedrooms or less, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment, **unless evidence is submitted to demonstrate otherwise**”.*

Policy HC3: Affordable Housing

- 3.5 The latest *Housing Market Assessment Update (2022)* identifies a net affordable housing need of between 67 dpa and 156 dpa, dependent on the proportion of household income used spent on housing costs. The *Viability Study (2022)* clearly highlights the challenges in delivering the 30% affordable housing requirement, and highlights that without higher sales values the sites would not necessarily be viable. As such, affordable housing policy should take full account of all evidence in terms of both affordable housing need and viability, and ensure that sufficient flexibility remains.
- 3.6 PPG states that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. The NPPF states that planning policies should expect at least 10% of the total number of homes to be available for affordable home ownership. The proposed policy is consistent with these requirements.

- 3.7 However, in relation to affordable housing tenure, existing Core Strategy policy H2 states that the precise proportion of affordable housing tenure split will be agreed with the Council *“having regard to local housing needs within the locality of the development, exceptional circumstances and the effects on the viability of a scheme.”*
- 3.8 The proposed policy should be less prescriptive in terms of tenure mix, to allow sites to best respond to current housing needs with a location and site-specific approach. Impact on scheme viability is referenced in the existing policy H2, and there should also be an allowance for a consideration of site viability, including whether there is a need for new infrastructure etc. which could impact on delivery of the allocated sites. The proposed tenure split for affordable housing is broadly in line with the need evidenced in the *Housing Market Assessment Update 2022*. However, this may change over time and location-specific flexibility should be provided.

Policy HC4: Homes for older people and others with special housing requirements

- 3.9 Bellway support the provision of accessible homes that are suitable to meet the needs of older people and others with special housing requirements. However, if the Council is to adopt the higher optional standards within the Building Regulations (Part M4(2) Category 2) for accessible and adaptable homes, it should only do so by applying the criteria set out in PPG.
- 3.10 The PPG identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The Council should provide localised evidence making the specific case for South Staffordshire which justifies the inclusion of **optional** higher standards for accessible and adaptable homes in this policy. If the Council can provide the appropriate evidence and this policy is to be included, then Bellway would support a transition period included within the policy, as appropriate.
- 3.11 The Council should also note that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.
- 3.12 There is a need for policy to be consistent with national standards unless a specific evidenced reason exists for a higher standard to be applied in South Staffordshire.

Policy HC12: Space about dwellings and internal space

- 3.13 The requirement to meet the Nationally Described Space Standard is considered reasonable. External space standards and amenity spaces should not be explicitly stated within the policy. Whilst there are caveats contained within which state an allowance for flexibility *“depending upon the site orientation and the individual merits of the development proposal”*, planning judgement on a case-by-case basis with reference to the distance/size criteria as guidance rather than policy would suffice to achieve suitable quality residential environments. It must be ensured that specific

criteria do not result in 'planning by numbers' and an unintentional lack of flexibility in assessing future planning applications.

Policy HC13: Parking Provision

- 3.14 Part (e) of the Policy references Appendix I of the Plan which sets out parking standards, in relation to electric vehicles. Bellway support the Council's endeavours to encourage electric vehicle uptake.
- 3.15 Part S of the Building Regulations 'Infrastructure for the charging of electric vehicles' has now taken effect and provides guidance on the installation and location of electric vehicle charge points (EVCPs). It states that a new residential building with associated parking must have access to EVCPs and that their total number must be equal to the number of parking spaces if there are fewer parking spaces than dwellings, or the equal to the number of dwellings where there are more parking spaces. The Regulations also set technical requirements for the charging points these include having a nominal output of 7kW and being fitted with a universal socket.
- 3.16 The policy should avoid repeating electric vehicle requirements which are otherwise secured through Building Regulations and which may risk a lack of accordance with the Regulations should requirements change during the lifetime of the Plan.

Policy HC17: Open Space

- 3.17 The approach of this policy is welcomed, which provides flexibility in terms of the location of any open space – to respond to a site's characteristics to ensure any development maximises recreational use. This is a more appropriate approach than being specific about the potential location of open space, as had been previously proposed by the preferred options consultation.

Policy HC19: Green Infrastructure

- 3.18 The policy will require that all development proposals maximise on-site green infrastructure. The aim of the policy and for the maximisation of on-site green infrastructure is to enhance biodiversity, improve connectivity to existing habitats and enhance the quality of the area for the benefit of residents.
- 3.19 An enhancement in the provision of green infrastructure can be achieved on both sites with buffers to the Green Belt to the north and west.

Policy NB6: Sustainable Construction

- 3.20 The proposed policy approach represents repetition of the 2021 Part L Interim Uplift and the Future Homes Standard. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard negate any need for local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

- 3.21 The policy states that all residential schemes must also show compliance with a water efficiency standard of 110 litres/person/day. The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person. The higher standard proposed within the draft policy has not been justified in accordance with the standard required by the NPPF. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, it should justify doing so by applying the criteria set out in the PPG.
- 3.22 Given the above the policy does not serve a clear purpose. Whilst the policy will require the calculation of the whole life cycle carbon emissions and actions to reduce life cycle carbon emissions, it is not clear how determination will be made as to what is an appropriate level of emissions or reductions. There are also concerns in relation to the elements of the policy regarding performance and monitoring. It is not clear what the Council would do with the information in relation to performance information or the monitoring information once the development is completed.
- 3.23 For the above reasons the policy is not considered to be justified and should be deleted.

EC13: Broadband

- 3.24 Bellway will work to provide modern and future-proof infrastructure provision within sites to be delivered, including broadband connectivity. This reflects Bellway's ambition to provide contemporary, attractive places to live which provide a high-level of connectivity.

4. Summary

- 4.1 Bellway welcome the opportunity to engage with the South Staffordshire Local Plan Review (LPR) publication plan regulation 19 consultation.
- 4.2 Bellway are broadly supportive of the publication plan, in particular the overall housing need, the contribution to the Greater Birmingham and Black Country Housing Market Area which is completely justified, and the proposed allocation of land off Orton Lane, Wombourne (housing allocation 416), supported by the plan's evidence base.
- 4.3 Bellway however have the following concerns regarding the plan, which may require remedy:
- Whilst not objecting to principle of Cross Green, the **proposed delivery trajectory is ambitious based on lead in times for significant infrastructure**. On this basis the Council should consider whether further evidence can be provided to justify the scale of growth proposed for Cross Green, of if not then its anticipated delivery before 2039 should be reduced and the associated growth delivered elsewhere in the district, such as land west of Strathmore Crescent in Wombourne.
 - **Bellway's additional land to the west of Strathmore Crescent represents a more sustainable and suitable location for growth at Wombourne than the proposed allocation at and off Billy Buns Lane and Gilbert Lane**. The Council's own evidence base demonstrates development on land west of Strathmore Crescent will result in less Green Belt harm and the site is of a lower landscape sensitivity than land off Billy Buns Lane and Gilbert Lane.
 - **Land to the west of Strathmore Crescent is visually contained by its boundaries, which contributes to its suitability**. Its allocation would complement to proposed allocation off Orton Lane.
 - Other policies, outlined in Section 3 of this statement, are overly prescriptive and therefore not consistent with national policy in terms of ensuring that the policies are sufficiently flexible to meet changing requirements.
- 4.4 We would welcome the opportunity to discuss the contents of these representations further with officers and reserve the right to attend any future examination hearing sessions.

**Appendix 1: Land west of Orton Lane,
Wombourne opportunities and
constraints plan**



Do not scale from this drawing.
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DISCUSSION

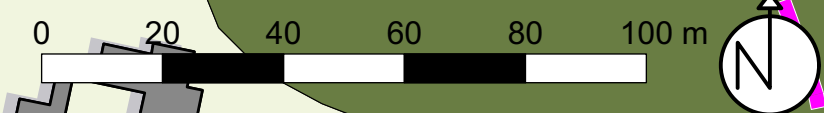
- Site boundary (1.76ha)
- ← Proposed site access point
- Existing trees/hedgerows (& RPA) to be retained (where possible)
- Priority Habitat Woodland
- Site of Special Scientific Interest (SSSI)
- Existing pond (assumed to be infilled)
- - - Existing Public Rights of Way
- - - S Staffordshire Railway Walk (Mondarch's Way)
- ~ Rear/side residential boundary
- ▨ Draft allocated land (SA5)
- ← Existing site access point
- ← Proposed primary street
- ← Proposed secondary streets
- ↔ Proposed link to safeguarded land
- ▨ Indicative residential development area (1.16ha)
- Indicative LEAP & 20m offset
- Area reserved for attenuation
- Pumping station & 10m offset
- - - Swale
- Borehole & 10m offset
- Attenuation tank
- /// Enhanced boundary planting
- - - Proposed recreational route
- ▨ Indicative areas of POS (0.29ha)

Rev.	Date	Description
Land to the west of Orton Lane, WOMBOURNE		
Constraints and Opportunities Plan		
Job ref: 390	Drawing number: SK01	Revision: -
Scale: 1:1,250 @ A3		Date: Nov 2022



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**Appendix 2: Land west of Orton Lane,
Wombourne framework plan**



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DISCUSSION

- Site boundary (1.76ha)
- Existing trees/hedgerows (& RPA) to be retained (where possible)
- Existing pond (assumed to be infilled)
- - - Existing Public Rights of Way
- - - S Staffordshire Railway Walk (Mondarch's Way)
- Indicative residential development area (1.13ha)
- Proposed street network
- ┌ Indicative frontages
- * Landmark buildings
- Focal space
- Indicative LEAP & 20m offset
- Area reserved for attenuation
- Pumping station & 10m offset
- Swale
- Borehole & 10m offset
- Attenuation tank
- Enhanced boundary planting
- Proposed tree planting
- Proposed recreational route

Rev.	Date	Description
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Land to the west of Orton Lane, WOMBOURNE

Framework Plan

Job ref: 390	Drawing number: SK02	Revision: -
Scale: 1:1,250 @ A3		Date: Nov 2022



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**Appendix 3: Land west of Strathmore Crescent
site location plan**



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PRELIMINARY

- Site boundary
 - - - Existing Public Right of Way
 - - - S Staffordshire Railway Walk (Mondarch's Way)
 - Safeguarded land (SAD3)
- OPPORTUNITIES**
- ← Proposed access point
 - ↔ Potential future connections
 - ↔ Visual and landscape connectivity

Rev.	Date	Description
		Land to the west of Orton Lane WOMBOURNE
		Potential Phase 2 - Location Plan
Job ref: 278	Drawing number: SK03	Revision: -
Scale: 1:2,500 @ A3		Date: October 2020

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Appendix 4: EDP Landscape and Green Belt Review (2021)



**Land at
Wombourne**

**Landscape and
Green Belt
Review**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
Bellway Homes Ltd

December 2021
Report Reference
edp7419_r001b

Contents

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Appendices

Appendix EDP 1	Findings of EDP Data Trawl
Appendix EDP 2	EDP Green Belt Assessment Methodology and Criteria
Appendix EDP 3	Green Belt Study Assessment Methodology and Criteria

Plans

Plan EDP 1	Site Context and Designations (edp7419_d001b 10 December 2021 JTF/LTi)
Plan EDP 2	Green Belt Context (edp7419_d002 10 December 2021 JTF/LTi)

This version is intended for electronic viewing only

	Report Ref: edp7419_r001			
	Author	Formatted	Peer Review	Proofed by/Date
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001a	LTi	-	CM	SC 291121
001b	LTi	-	-	-

Section 1 Introduction and Purpose

Introduction

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by Bellway Homes Ltd to undertake a Landscape and Green Belt Review of a potential development site located within the Green Belt to the north of Wombourne, South Staffordshire. The potential site is situated on a triangular piece of land between Strathmore Crescent to the east and the South Staffordshire Railway Walk in the west (hereafter referred to as the 'site') within the northern extent of the settlement. This report forms part of a promotion of land located in the Green Belt and determines its potential for development.
- 1.2 The site lies within the South Staffordshire Green Belt and is identified as part of Green Belt parcel S53 by the Green Belt Study¹. The Landscape and Sensitivity Study² places it within landscape parcel SL21. It is further mentioned in the Strategic Housing and Economic Land Availability Assessment (SHELAA)³ as a potential development site.
- 1.3 This report should be read in conjunction with the Environmental Context Plan provided at **Plan EDP 1**. The site is illustrated on **Figure EDP 1.1** below.



Figure EDP 1.1: Aerial Image showing site location.

¹ LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

² LUC (2019), South Staffordshire Landscape Sensitivity Study, South Staffordshire District Council

³ South Staffordshire Council (2020), SHELAA, accessed at *SHELAA & 5 Year Housing Land Supply South Staffordshire Council* (sstaffs.gov.uk) on 04.11.2021

- 1.4 EDP is an independent environmental planning consultancy with offices in Cirencester, Cardiff and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk).
- 1.5 The purpose of this Landscape and Green Belt Review is to assess the extent to which the site performs, in landscape and visual terms, in relation to its contribution to the purposes of the Green Belt as outlined in the National Planning Policy Framework (NPPF)⁴. The Green Belt review provides a site-specific evaluation to supplement the existing, wider Green Belt Review and to determine the suitability for development.
- 1.6 The landscape and visual review evaluates the site's sensitivity to development in relation to the existing Landscape Sensitivity Study, and the Council's contentions in relation to this; in particular that the site is of higher sensitivity to other land around the settlement.
- 1.7 EDP's work has included the following key strands:
- A review of relevant planning policy and context;
 - A desktop study and web search of relevant background documents and maps;
 - A field assessment of local site circumstances, undertaken by a qualified landscape architect, including a photographic survey of the character and context of the site and its surroundings; and
 - A summary of the key constraints and opportunities identified through desk study and site analysis undertaken by EDP.

⁴ National Planning Policy Framework (2021), Ministry of Housing, Community and Local Government, London

Section 2 Planning Context

Planning Context

- 2.1 Relevant planning policy in relation to the Green Belt designation and matters relating to landscape and visual circumstances have been reviewed and are summarised below.

National Planning Policy Framework (NPPF)⁵

- 2.2 The NPPF requires land to demonstrate that it contributes towards the essential characteristics of openness and permanence by meeting one or more of five purposes, or ‘tests’, of Green Belt designation, which are set out at Paragraph 138 as follows:
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.”*
- 2.3 For each NPPF purpose, EDP has defined criteria that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the Green Belt in this location.
- 2.4 Paragraph 140 highlights the possibility to review and alter Green Belt boundaries, where exceptional circumstances have been identified and justified. *“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”.*
- 2.5 Planning practice Guidance (PPG) for the NPPF notes that where land is released from the Green Belt, “compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land” should be considered.

⁵ National Planning Policy Framework (2021), Ministry of Housing, Community and Local Government, London

South Staffordshire Core Strategy (December 2012)⁶

- 2.6 The South Staffordshire Core Strategy (SSCS) provides an overview of policies and strategies which will shape future development in the district. The following is a summary of relevant planning policy.
- 2.7 The Core Strategy outlines the strategic objectives for the district. Strategic Objective 1 states that the Council aims to “*protect and maintain the Green Belt and Open Countryside in order to sustain the distinctive character of South Staffordshire*”. Strategic Objective 2 further identifies the goal to “*protect and retain the important strategic gaps between existing settlements*”. Strategic Objective 4 states that the plan aims to “*protect, conserve and enhance the countryside, character and quality of the landscape*”.
- 2.8 Policy GB1: Development in the Green Belt identifies development that would be considered appropriate within the Green Belt designation. This includes new buildings for:
- “*c) affordable housing where there is a proven local need in accordance with Policy H2*”
- 2.9 Core Policy 2: Protecting and Enhancing the Natural and Historic Environment outlines opportunities for development which would be supported by the Council. This includes development that:
- “*b) are not contrary to the control of development within internationally, nationally or locally designated areas including the Green Belt and Open Countryside [...]*”; and
- “*e) provide mitigation or compensatory measures to address any potential harmful implications and supporting enhancement measures*”.
- 2.10 Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape states that the typical “*rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced*”. It emphasises the need for development proposals to be appropriate within their context with regards to scale, layout and location.

Strategic Housing and Economic Land Availability Assessment (SHELAA)⁷

- 2.11 The SHELAA provides an overview of sites that are suggested for potential housing or employment development. The site is included as site 708, which is identified as “*potentially suitable but subject to policy constraints*”.

⁶ South Staffordshire Council (2012), Core Strategy Development Plan

⁷ South Staffordshire Council (2020), SHELAA, accessed at SHELAA & 5 Year Housing Land Supply South Staffordshire Council (sstaffs.gov.uk) on 04.11.2021

Section 3 Landscape Context

South Staffordshire Landscape Sensitivity Study (2019)⁸

- 3.1 The South Staffordshire Landscape Sensitivity Study considers the sensitivity of land to potential built development within the Green Belt designation in South Staffordshire. Wombourne is identified as a main service village within the district. The site is located in the eastern part of landscape area SL21 (as shown on **Figure EDP 3.1**).

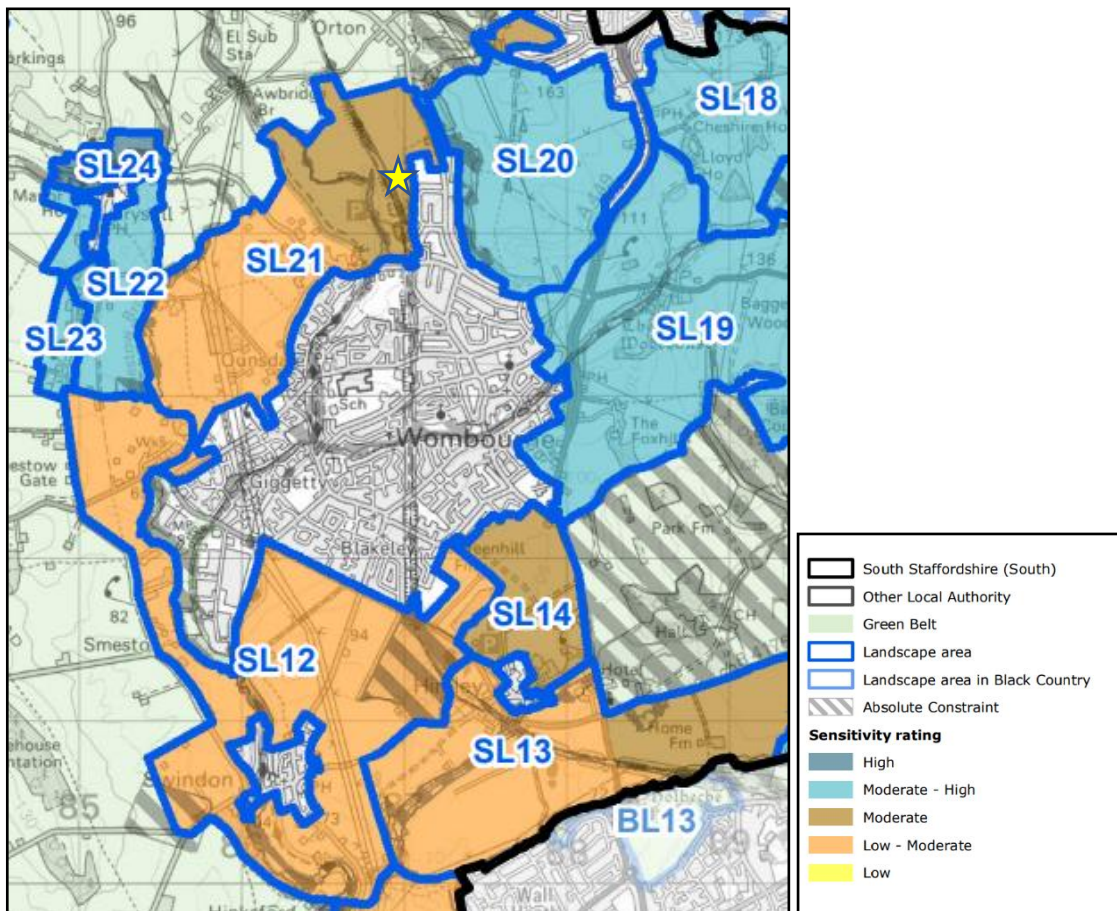


Figure EDP 3.1: Location of landscape parcel SL21 (indicated by the yellow star).

- 3.2 Areas of land on the settlement edge with semi-rural land-uses are identified as potentially sensitive to built form “due to their role in providing a perceived gap and preventing coalescence between the wider conurbation and individual villages, such as Wombourne”. It highlights the opportunity for landscape features to “provide significant boundary features separating urban areas from the surrounding countryside”.
- 3.3 The study identifies SL21 as having both a low to moderate, and also moderate, landscape sensitivity. The site falls within the eastern extent of the landscape area, which is classed

⁸ LUC (2019), South Staffordshire Landscape Sensitivity Study

as having moderate sensitivity. The study defines moderate sensitivity as landscape which has “*some distinctive characteristics and valued qualities, with some sensitivity to change as a result of introducing built development.*”

- 3.4 The study provides a wider overview of the whole landscape area SL21. This is limited in identifying the site’s sensitivity to development. While it provides a useful overview to the landscape’s condition, it is not considered to assess the site’s sensitivity in sufficient detail. A detailed assessment of the site in relation to the Green Belt designation is provided in **Section 5** of this report.

Environmental Designations

- 3.5 This section summarises the relevant landscape and environmental designations within 1km of the site boundary. Further information is provided on **Plan EDP 1**.

Public Rights of Way (PRoW)

- 3.6 There are no Public Rights of Way (PRoW) located within the site. The following footpaths are located within 1km of the site:

- The Monarch’s Way long distance footpath lies approximately 10m west of the site;
- Footpath Wombourne 23 follows the eastern boundary of the site;
- Footpath Wombourne 20 approximately 600m to the north of the site;
- Footpath Lower Penn 2 approximately 720m to the north of the site;
- Footpath Wombourne 42 approximately 220m to the north-east of the site;
- Bridleway Wombourne 16 approximately 650m to the east of the site;
- Bridleway Wombourne 15, approximately 650m to the east of the site;
- Footpath Wombourne 17, approximately 530m to the east of the site;
- Footpath Wombourne 24, approximately 640m to the south of the site; and
- Footpath Trysul and Seisdon 13 lies approximately 940m to the west of the site.

Sites of Special Scientific Interest (SSSI)

- 3.7 There are no Sites of Special Scientific Interest (SSSI) present within the sites. The South Staffordshire Railway Walk is a linear SSSI that lies immediately to the west of the site.

Conservation Areas

3.8 There are no Conservation Areas present within the site. The following Conservation Areas are located within 1km of the site:

- Wombourne Conservation Area, approximately 890m to the south-east of the site; and
- Staffordshire and Worcestershire Canal Conservation Area approximately 550m to the west, following the Canal's route.

Heritage Assets

3.9 There are no heritage assets located within the site. There are seven listed features within 1km of the site. These include:

- Grade II listed Orton Grange approximately 620m to the north;
- Grade II listed White Cross House approximately 780m to the north;
- Grade II listed Orton House and attached stable approximately 990m to the north;
- Grade II* listed The Bratch Water Pumping Station approximately 380m to the south - west;
- Grade II listed Staffordshire and Worcestershire Canal Bratch Locks, Bridge No 47 and toll house approximately 390m to the south-west; and
- Grade II listed Staffordshire and Worcestershire Canal Cottage at Bumblehole Lock approximately 900m to the south-west.

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Section 4 Green Belt Context

South Staffordshire Green Belt Study⁹

4.1 The site lies within the South Staffordshire Green Belt to the north of Wombourne. The Green Belt study is divided into two parts, which summarise the condition and contribution of identified parcels to the purposes of the Green Belt and then go on to evaluate their sensitivity in relation to development. The site, which covers an area of approximately 3 hectares (ha), is identified as Parcel S53 (as shown in **Figure EDP 4.1**), which extends north beyond Pattingham and has an overall area of 3,072ha. Generally, the study highlights the following in relation to the parcel:

- Parcel S53 is noted as having moderate contribution to purpose 1 of the Green Belt;
- It has weak or no contribution to purpose 2 and 4 of the Green Belt; and
- It has strong contribution to purpose 3 of the Green Belt.

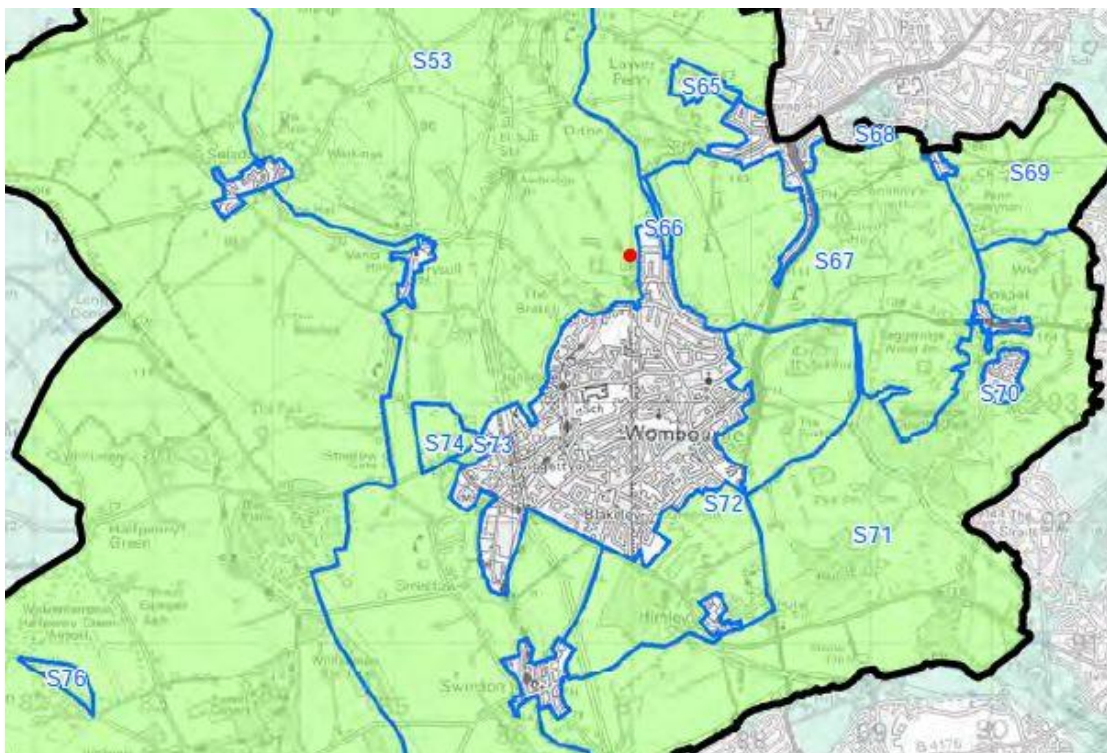


Figure EDP 4.1: Extract from Green Belt study showing location of the site (red dot) in relation to identified Green Belt parcel S53.

⁹ LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

4.2 The parcel is further divided into sub parcels, of which the site falls into Parcel S53C (as shown in **Figure EDP 4.2**). The site is located in the eastern extent of the parcel, which is noted as having moderate to high harm rating.

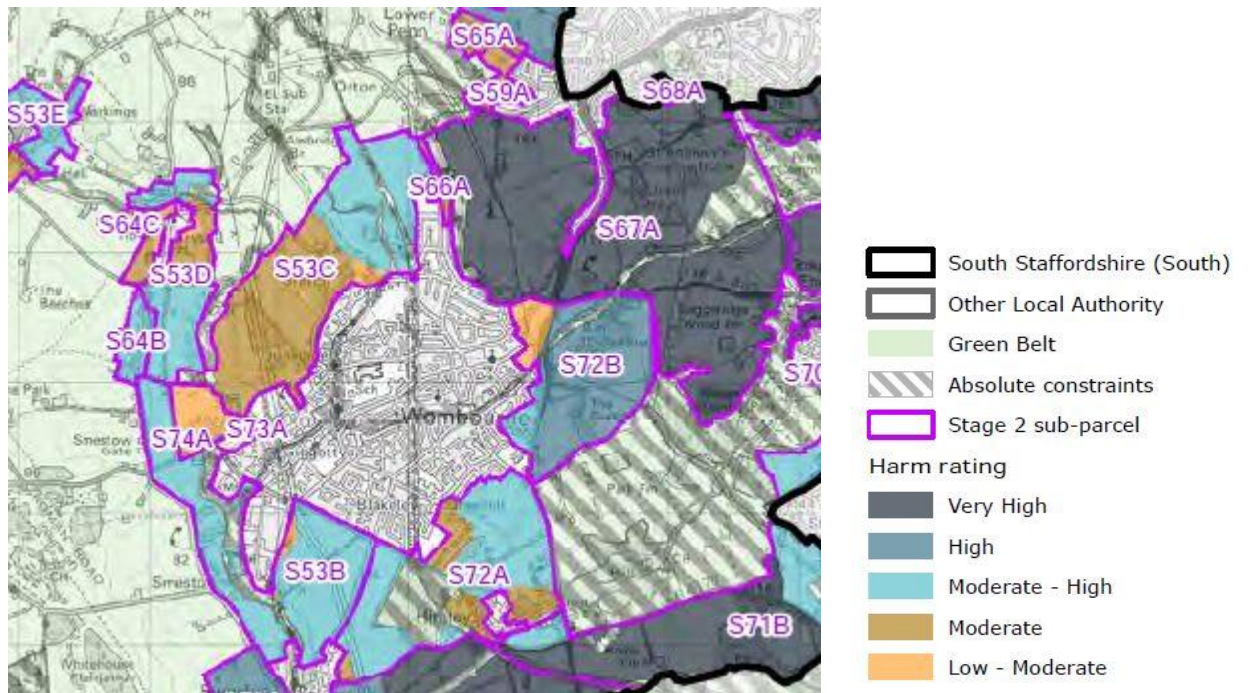


Figure EDP 4.2: Extract from Green Belt Study showing Green Belt Parcel S53 C and sensitivity to development.

4.3 The study further places the site within sub parcel S53C. This is further divided into parcels of development scenarios and any release of land “to the north of the Staffordshire and Worcestershire Canal” is placed within sub parcel S53C-S1 (as shown on **Figure EDP 4.3**) and is evaluated as being of moderate to high sensitivity. The site covers a small part of the overall parcel, which extends to the west and covers an area of approximately 61.85ha. The study states that the sub parcel “makes a strong contribution to preventing encroachment on the countryside and a moderate contribution to preventing sprawl of the West Midlands conurbation”. However, it does note that “there is no strong distinction between this relatively flat sub-parcel and the inset settlement edge of Wombourne”. The parcel is separated from the wider West Midlands conurbation through woodland and topography to its north-east. “Reduction in physical distance between Wombourne and Wolverhampton would still constitute some weakening of the integrity of the Green Belt gap”.

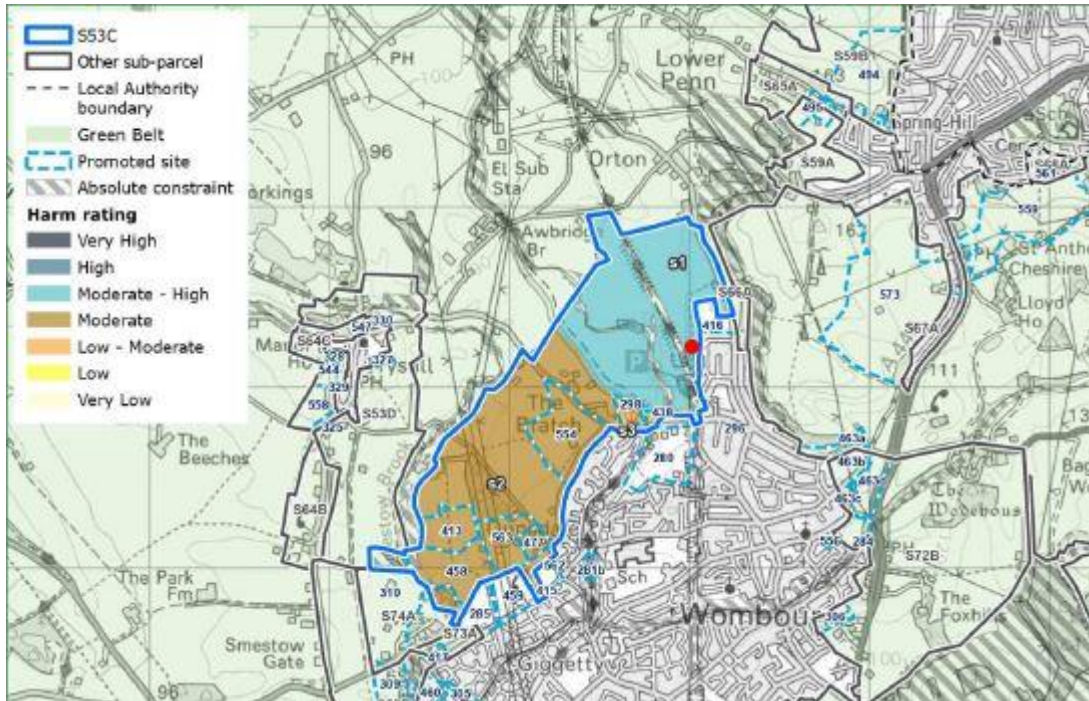


Figure EDP 4.3: Extract from Green Belt Study showing the site (red dot) within Sub-Parcel S53C and S1.

- 4.4 While the Green Belt Study gives an overview of the wider condition of the Green Belt of the larger parcel, it is not specific to the site itself and as such is not considered to accurately represent its actual sensitivity in relation to the wider landscape. **Section 6** provides a detailed review of the Green Belt designation in relation to the site and how it performs in relation to the purposes of the Green Belt. Given the size of the parcels defined by the LPA thus far, this is considered an essential step in understanding the role it plays in this respect.

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Section 5 Landscape and Visual Review

- 5.1 This section considers landscape and visual matters. It provides a baseline review of the site's current condition and evaluates its general sensitivity to development.

Landscape Character

National Character Area (NCA) 66: Mid Severn Sandstone Plateau¹⁰

- 5.2 The site falls within National Character Area 66: Mid Severn Sandstone Plateau. The area is described as a well wooded landscape with “blocks of mixed woodland and old orchards”. Large open fields and weak hedgerow patterns are described as characteristic features. While this gives a general understanding of the higher-level landscape character, it is not a detailed representation of characteristics present within the site and surrounding area.

Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996-2011, Volume 3: Landscape Descriptions (2000)¹¹

- 5.3 The Landscape Descriptions document provides a more extensive evaluation of the regional character of areas within the NCA that lie within Staffordshire. The regional landscape is divided into two Landscape Types (LTs) – Ancient Redlands and Sandstone Estatelands, which are further divided into landscape character areas (LCAs). The site lies within the Sandstone Estatelands LT. Relevant extracts are provided in **Appendix EDP 1**. Key characteristics are:

- *“Settlement is sparse and characterised by expanded hamlets and wayside cottages”;*
- *“Rolling landscape gives way to flatter land along the river valleys, but there are dominant ridge features with scarp slopes”;* and
- *“A landscape that appears far more wooded than it is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places.”*

¹⁰ Natural England (2014), NCA 66: Mid Severn Sandstone Plateau, accessed at <http://publications.naturalengland.org.uk/publication/5001578805198848?category=587130> accessed on 08.11.12

¹¹ Staffordshire County Council Development Services Department (2000), Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996-2011, Volume 3: Landscape Descriptions, Staffordshire County Council

5.4 The site falls within LCA Sandstone Estatelands: farmland. Relevant extracts are provided in **Appendix EDP 1**. Key characteristics are:

- *“Landscape of intensive arable farming on flat to very gently undulating landform characterised by very sparse scattering of isolated mature oak trees and hedgerows”;*
- *“Local river courses and canal do not have a high visual impact but their presence is associated with increased tree cover in the valleys”;* and
- *“Long views out to rising ground”.*

5.5 The Landscape Descriptions provide an overview of the local landscape character. While the site and its immediate context feature some elements described within the character assessment, it is generally too broad to effectively comment on the site’s condition and appearance.

Site Character

5.6 The above gives an indication of the site’s landscape character context on a regional and national level. With regards to the site itself, the following is an assessment of the site character undertaken by EDP:

- Triangular field which has distinctive boundaries to the east and west but is visually open to the north with a post and wire fence marking the boundary;
- Equestrian land use as a paddock for horses, with grassland and scrub present within the site;
- Predominantly flat, low-lying landscape with slight undulations making the southern part of the site slightly higher than the northern part;
- Well-vegetated western and southern boundary; and
- Strong visual relationship with residential development to the east which has urbanising influence on the site.

5.7 The site lies within landscape parcel LS21 which forms part of the Green Belt to the north of Wombourne. It’s bound by post and wire fencing to the north and forms part of a wider network of irregularly shaped fields and pastures located between Orton Lane to the east and the South Staffordshire Railway Path to the west (as shown on **Figure EDP 5.1**). The site appears to be well-used as an equestrian field and popular for recreation.



Figure EDP 5.1: View from PRoW Wombourne 23 looking towards the northern boundary of the site, illustrating the boundary treatment within fields and the dense vegetation along the disused railway line.

- 5.8 Residential dwellings back onto and form the eastern boundary of the site. The north-eastern boundary is formed by shrubs which bound a field to the north-east of the site, which is allocated site 416 for housing development. Several residential properties have created informal access points to the site (as shown on **Figure EDP 5.2**). A public footpath follows the site's eastern boundary. While the majority of the vegetation along this side of the site is ornamental and of limited landscape and habitat value, there are two significant oak trees of note located within residential land (as shown on **Figure EDP 5.3**).



Figure EDP 5.2: Informal access to the site from residential properties.



Figure EDP 5.3: Oak trees within residential properties form focal points along the site's eastern boundary.

- 5.9 A dense area of vegetation forms the site's boundary to the south. The tree lined South Staffordshire Railway Path lies immediately to the west of the site. The topography is predominantly flat, with undulations visible in the distance to the north and north-east of the site. The site itself slopes slightly from the south to the north, where it becomes level with the railway path.



Figure EDP 5.4: Dense vegetation, with mainly mature trees and some understorey shrub planting, forms the site's southern and western boundary.

EDP Site Appraisal

- 5.10 Generally, the site benefits from well-vegetated boundaries to the south and west and is defined by its equestrian land use. However, residential development along Strathmore Crescent to the east of the site has an urbanising influence and detracts from its rural character. Access points from the residential properties among ornamental hedges and fences further detract from the site's rural appearance.
- 5.11 The wider landscape area beyond the settlement edge and the immediate area of residential development forms part of the wider countryside surrounding Wombourne. Characteristic features such as tree and woodland groups and hedgerows form field boundaries and focal points, making the eastern extent of parcel SL21 a moderately sensitive landscape to development, as noted in the Landscape and Sensitivity Study.
- 5.12 In contrast to this, the site generally has no notable landscape features aside from vegetation along its boundaries and is strongly influenced by adjacent development. As a result, the site is considered to be in discordance with the eastern part of landscape parcel SL21 and to exhibit a low to medium sensitivity in landscape terms, which is consistent with the Low to Moderate score of the remainder of parcel SL21 to the west (see **Figure EDP 3.1** in **Section 3**).
- 5.13 While it does not currently form a defensible boundary to the Green Belt, it has potential to create a strong and permanent boundary to the existing settlement given its location, its juxtaposition with the adjacent settlement and allocated site 416, its boundaries and the potential for additional structural landscaping along the northern boundary. As per the Landscape Sensitivity Study, the wider character of the area enables notable landscape features such as tree groups and areas of woodland to *“provide significant boundary features separating urban areas from the surrounding countryside”*.

Visual Matters

- 5.14 A site visit was undertaken in November 2021, to provide site photography and determine the visibility of the site in relation to the surrounding area. This section considers the visual amenity of the site.
- 5.15 From the north, there is no intervening built form or vegetation to screen views to or from the site. As a result, open views are available towards the wider countryside to the north of the site (see **Figure EDP 5.5**).



Figure EDP 5.5: View looking north beyond the site's boundary and towards the wider countryside.

- 5.16 From the east, views are limited due to the residential development adjacent to the site. Views are restricted to close-range views as a result of the intervening built form. There is visibility of the site from residential roads adjacent to the site (as shown in **Figure EDP 5.6**).



Figure EDP 5.6: Visibility of the site from residential roads, showing the dense boundary vegetation on the site's western boundary.

- 5.17 There are no views of the site beyond Orton Lane due to the extensive tree cover at Ladywell Wood to the east of Orton Lane. Furthermore, due to topographical undulations to the north-east of the site, there is no visibility of the site in long-distance views. Generally, the site would integrate with the settlement boundary and is not easily discernible from further afield.

- 5.18 From the south, visibility of the site is limited due to the extensive area of vegetation surrounding the Railway Café between the site and residential properties along Bratch Lane. From within the site, tops of residential dwellings can be glimpsed beyond the treeline.
- 5.19 From the west, visibility of the site is restricted due to the flat topography and the extensive tree belt along the western site boundary. Views from the Staffordshire Railway Walk would be screened through the extensive vegetation (as shown in **Figure EDP 5.7**). Furthermore, the railway path is partly within cutting, so that visibility of the site from the footpath is further restricted. Beyond close-range views there would be limited to no visibility of the site.



Figure EDP 5.7: View of South Staffordshire Railway Path along western boundary of the site, dense tree cover limits views of the site to glimpsed views of its northern extent through the trees.

- 5.20 The dense belt of vegetation along the site's western boundary is noticeable from further afield. As shown in **Figure EDP 5.8**, It forms a marked dissection of the landscape and screens views of the site.



Figure EDP 5.8: View from South Staffordshire Canal looking east towards the site's western boundary, which forms a distinctive line of trees within the landscape.

- 5.21 Generally, the site is visually contained on all sides except from the north. The visual relationship with the residential development to the east defines the site's visual character. From the north, the site appears to sit on the settlement edge due to its close relationship with the adjacent residential development.

Summary of Landscape and Visual Review

- 5.22 From a landscape perspective, there are no landscape features of note located within the site and the site is not subject to a landscape designation. While the site benefits from its distinctive boundary vegetation, it makes a limited overall contribution to the quality of the local landscape. The visual influence from the adjacent residential development to the east has an urbanising effect and detracts from the site's rural appearance. The site is generally visually contained by boundary vegetation and residential development.
- 5.23 Furthermore, land to the north-east of the site has been allocated for development (parcel 416) and would increase the urbanising influence on the site. The site is considered to be in discordance with the Landscape Sensitivity Study and does not contribute to the general quality of the wider landscape parcel SL21. This stems from the sensitivity assessment (necessarily) considering much larger land parcels. The above review shows that a low to medium sensitivity, rather than the moderate identified in the Sensitivity Study, is more appropriate.

- 5.24 The site is visually contained from the east and west. The well vegetated western boundary forms an effective visual buffer to the site (as shown in **Figures EDP 5.7** and **5.8**). The residential development to the east forms a physical barrier which restricts visibility of the site to close-range views.
- 5.25 From a visual perspective, the site reads as part of the settlement edge. Development within the site would have the potential to connect with residential development at Strathmore Crescent. Development within the site would also be able to connect with the allocated site to the north-east. This would integrate new development on the site with existing development so that it is perceived as an extension to the adjacent properties along the settlement edge. Generally, the site forms a small part of the parcel SL21 and development would be a marginal extension into the wider parcel alongside existing development to the east and allocated land to the north-east of the site.
- 5.26 The existing vegetation along the site boundary could be enhanced to strengthen the western boundary and the eastern boundary. New vegetation could be introduced to the north to create a new, clearly defined, permanent settlement edge to the site and the allocated site to the north-east. By increasing the boundary vegetation, views from the wider countryside would benefit from an attractive backdrop. There is also an opportunity to introduce structural planting within the site to link to existing green infrastructure elements outside of the site and add to the local network of landscape and habitat features.
- 5.27 The site provides an opportunity to create a clearly defined permanent settlement edge. There is potential to provide additional vegetation and tree cover to the north of the site and would create a distinctive, defensible edge to the Green Belt designation. This would be in accordance with the local vegetation patterns and would link existing features within the local context.

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Section 6 Green Belt Review

Green Belt Review

- 6.1 This section contains an appraisal undertaken by EDP of the site in relation to its contribution to the Green Belt. **Table EDP 6.1** presents the assessment of the wider Green Belt parcel S53C as per the Council's Green Belt Study and applies the same methodology (provided for clarity at **Appendix EDP 3**) specifically to the site. Whilst an assessment based on EDP's methodology has been undertaken at **Table EDP 6.2** to **Table EDP 6.5**, it is useful to be able to compare like with like, so that a direct comparison can be made.

Table EDP 6.1: Local Authority Green Belt Study Methodology Applied to Parcel and Site.

Assessment of Parcel and Site Contribution to Green Belt Purpose				
GB Purpose and Criteria	Green Belt Study Assessment of Parcel S53C ¹²	Green Belt Study Rating	EDP Site-Specific Assessment	EDP Site-Specific Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land contains no or very limited urban development and has strong openness. It is close enough to the large built-up area to have some association with it, but also retains some distinction.	Moderate	The site lies adjacent to residential development. While it is open to the north and has views of the open countryside, the site strongly relates to the adjacent development. The site is contained by boundary vegetation to the south and west and by development to the east. New development within the site would read as an extension to the existing residential development.	Moderate to Weak/No Contribution
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and the nearest neighbouring town.	Weak/No Contribution	The site does not play a significant part in preventing the merging or coalescence of towns.	Weak/No Contribution

¹² LUC (2019), South Staffordshire Green Belt Study, South Staffordshire District Council

Assessment of Parcel and Site Contribution to Green Belt Purpose				
GB Purpose and Criteria	Green Belt Study Assessment of Parcel S53C ¹²	Green Belt Study Rating	EDP Site-Specific Assessment	EDP Site-Specific Rating
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong	The adjacent residential development has an urbanising influence on the site. While the site itself is open and has visual connection to the wider countryside to the north, the site relates strongly to the existing development. Its western boundary could form a permanent boundary to the Green Belt.	Weak/No Contribution
P4: Preserve the setting and special character of historic towns	Land does not form part of the setting of a historic town.	Weak/No Contribution	The site does not form part of the setting of a historic town.	Weak/No Contribution
P5: Assist in urban regeneration, by encouraging recycling derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong	The site is located within the Green Belt and would not encourage the regeneration of existing derelict or urban land.	Strong

6.2 **Table EDP 6.1** highlights the differences between the wider Green Belt parcel and the site's specific contribution to the Green Belt purposes. The site forms a small part of the wider parcel and makes a more limited contribution to the purposes of the Green Belt, particularly those relating to countryside encroachment and potential urban sprawl. The containment of the site on three sides by either development, strong and permanent boundaries or allocated residential development sites, means that it is inherently less 'open' and has a much moderated sensitivity to development than suggested by the Green Belt Study.

6.3 **Table EDP 6.2 to 6.5** evaluate the site's contribution to the purposes of the Green Belt based on EDP's methodology provided in **Appendix EDP 2**. The following tables analyse the site's contribution in detail and provide commentary on its condition.

Table EDP 6.2: Review of Contribution to Green Belt Purpose 1.

Purpose 1: To check the unrestricted urban sprawl of large built up areas		
Application of Criteria	Assessment	Score
Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/ wider countryside?	<p>The site is fully located within the South Staffordshire Green Belt. The site lies to the north of the settlement edge of Wombourne, which is identified as one of the largest villages in South Staffordshire by the local plan. While it forms a noticeable gap on the settlement edge, its proximity to residential development on its eastern boundary diminishes this effect. Residential properties at Strathmore Crescent form the site's eastern boundary and are visible from within the site. Additionally, land to the north-east of the site has been allocated for development and would enhance this effect once development is undertaken in this area.</p> <p>While there is no development within the site, the visual connection with the adjacent properties, both existing and proposed, heavily restricts the perceived distinction between the settlement edge and the wider countryside.</p>	Low to Moderate Contribution
Application of Criteria	Assessment	Score
Are there any defensible boundaries?	<p>Visually, the development site is contained on three sides. The site is open to the north and has no clearly defined boundary to the wider countryside. Residential development forms the eastern boundary and is clearly visible from within the site and limits views due to the intervening built form. Dense vegetation to the south reduces visual connectivity with the settlement edge. Its densely vegetated boundary along the South Staffordshire Railway Path to the west forms a strong boundary to the site. Of these boundaries, the most notable is the western boundary.</p> <p>The overall character of the site is considerably influenced by the adjacent residential development. The site provides an opportunity to create a new, permanent boundary to the current edge of the Green Belt.</p>	Low Contribution

Table EDP 6.3: Review of Contribution to Green Belt Purpose 2.

Purpose 2: To prevent neighbouring towns merging into one another		
Application of Criteria	Assessment	Score
Is the site well associated with the existing settlement edge?	The site is well associated with the settlement edge. It abuts residential development at Strathmore Crescent to the east, and the allocated site north of this.	Low Contribution

Purpose 2: To prevent neighbouring towns merging into one another		
Application of Criteria	Assessment	Score
What is the distance between the site and the next nearest settlement edge and what is the effect of the perceived and actual intervisibility on potential for coalescence?	<p>The site's northern boundary is approximately 780m to the south of Orton village and 940m to the south-west of the outskirts of Wolverhampton. Due to the intervening vegetation and the undulating landform to the north-west of the site there is no perceived intervisibility with these settlements.</p> <p>Overall, it is considered that extension of the settlement edge into the site would not be easily discernible from the next nearest settlements. Furthermore, there is potential to create a new, permanent settlement boundary to the north of the site which would further limit intervisibility.</p>	No contribution

Table EDP 6.4: Review of Contribution to Green Belt Purpose 3.

Purpose 3: To assist in safeguarding the countryside from encroachment		
Application of Criteria	Assessment	Score
How representative is the site of the key characteristics of the countryside?	<p>The site lies within the Sandstone Estatelands LCT and the Sandstone Estatelands: Farmland LCA as defined by the Landscape Descriptions (see more detail in Section 3).</p> <p>The site lies within the flatter land of the river valley which is described as a characteristic topographical feature of this area. As per the LCT, strategically located areas of woodland and lines of trees, such as the site's western boundary, make the wider landscape appear more wooded than it actually is. The site's views of the wider countryside to the north, with noticeable undulations as there is a slight rise in topography in the background, are also noted as a characteristic feature.</p> <p>The site benefits from a distinctive, vegetated boundary along its western border, which represents a typical character feature of the local landscape character. Trees and woodland groups are strategically positioned throughout the landscape and create an appearance of a well-wooded landscape, despite there being limited tree cover.</p> <p>As a result, it is considered that the site is partially representative of the local landscape character. The proximity to residential development in the east and the strong visual connection with the area of built development detracts from these character features. The western boundary forms a distinctive boundary to the site which would limit development from encroaching upon the wider countryside to the west.</p>	Moderate Contribution

Purpose 3: To assist in safeguarding the countryside from encroachment		
Application of Criteria	Assessment	Score
What is the influence of the urbanising features?	The site relates physically and visually with Wombourne due to its location near the settlement edge. The development site is urbanised by intervisibility with residential development.	Low Contribution

Table EDP 6.5: Review of Contribution to Green Belt Purpose 4.

Purpose 4: To preserve the setting and special character of historic towns		
Application of Criteria	Assessment	Score
Is there potential for intervisibility with an historic core?	<p>The site does not lie within a historic town. There are no listed features in proximity of the site.</p> <p>Wombourne Conservation Area is approximately 890m to the south-east of the site and Staffordshire and Worcestershire Canal Conservation Area approximately 550m to the west, following the Canal's route.</p> <p>It is therefore considered that the development site has no relation to any historic cores.</p>	No contribution

- 6.4 While the wider Green Belt parcel is noted as having a significant contribution to the purposes of the Green Belt, the site itself has limited contribution to checking the unrestricted sprawl of Wombourne, as illustrated by the review above. This is due to its location near existing development and the lack of distinctive boundary features towards the area of residential development. Despite the site having a distinctive and well-vegetated boundary to the south and west, it is considered to have an overall moderate to low contribution to Purpose 1, due to its strong connection with existing development.
- 6.5 The site features a well-vegetated boundary to the west which creates a strong and distinctive buffer between the existing development and the wider countryside to the west. However, the main extent of the site, which lies to the east of this buffer feature, makes little contribution to this purpose. The visual connection to the existing areas of development results in the site having a low contribution to Purpose 2.
- 6.6 The well-established boundary vegetation along the western boundary is representative of the local landscape character and provides precedent for any treatment for the northern boundary. It is a key element of the site which creates a visual and perceptual buffer for the countryside and wider Green Belt parcel to the west. The site is influenced by, and more closely associated with, the adjacent residential development to the east. As a result, the site is considered to have a moderate contribution to Purpose 3.
- 6.7 The site is not within a historic town. Wombourne Conservation area is to the south of the site and the Staffordshire and Worcestershire Canal Conservation Area to the west. The trees along the South Staffordshire Railway Path may be discernible from listed features within the local area to the north and north-west and would potentially form the backdrop of views from the Canal Conservation Area. Beyond this, the site does not appear have

effect on the setting of historic features. As a result, the site is considered to have no contribution to Purpose 4 of the Green Belt designation.

- 6.8 The site appears to be consistent with the Green Belt Study in that “*there is no strong distinction between this relatively flat sub-parcel and the inset settlement edge of Wombourne*”. Areas of woodland and changes in topography to its north-east limit its visual relationship with the wider countryside. Overall, the site forms a small part of the southern extent of Green Belt Parcel S53C Scenario 1 and makes a limited contribution to the open character and purposes of the Green Belt. It is therefore considered to have low to moderate sensitivity to development and result in only **low to moderate harm** to the Green Belt.
- 6.9 This is in contrast to the findings of the Council’s Green Belt study, which considers the site to have a **moderate to high** level of harm if released from the Green Belt. The detailed assessment of the site contained herein has considered landscape and visual matters specific to the site and concludes that it is of a lower sensitivity than stated within the study.
- 6.10 Generally, development of the site is considered to result in a low to moderate harm to the Green Belt designation if released for development. While its release from the Green Belt designation would reduce the overall size of the Green Belt Parcel, it would have limited to no effect on the integrity of the gap between Wombourne and nearby settlements. **Plan EDP 2** illustrates the potential outline of the amended Green Belt boundary in relation to the site. This is due primarily to its perceived distance from nearby settlements, but also the character of the landscape which ensures intervisibility and perceptibility is limited. Furthermore, the allocated site 416 to its north-east would extend beyond the existing settlement. The site provides an opportunity to create a permanent, defensible boundary between the Green Belt and the settlement, including the allocated site to the north-east.

Green Belt Compensation (GBC)

- 6.11 Green Belt Compensation (GBC) ensures that development proposals on former Green Belt land provide compensatory improvements to the quality and accessibility of the Green Belt. It becomes applicable, where it is necessary to release land from the designation for development and provides the opportunity to enhance land remaining within the Green Belt.
- 6.12 Should the site be put forward for development, GBC could be achieved in the form of:
- Enhanced biodiversity;
 - Increased areas of open access land; and
 - Upgraded public rights of way in the local vicinity.

Section 7 Summary and Potential Development Response

Summary

- 7.1 This report provides a landscape and Green Belt review of the site and evaluates how it contributes to the function of the Green Belt around Wombourne, South Staffordshire, whilst also considering its general sensitivity to development. It considers relevant planning policy, landscape and visual matters and the contribution the site makes to the purposes of the Green Belt as a distinct parcel of land.

Landscape Summary

- 7.2 As discussed in **Section 5**, the site is visually contained by vegetation and development on three sides. It is open to the north and has some physical and visual connectivity with the wider countryside in this direction. However, the visual influence from the adjacent residential development has an urbanising effect on the site and detracts from its rural appearance. Land to the north-east of the site has been allocated for development (site 416) and would increase further the urbanising influence on the site.
- 7.3 Furthermore, whilst the site features some typical landscape characteristics for the area, there are no landscape features of note present within the site. While the site does provide a certain level of open character in contrast to the settlement edge, there are features present which limit the site's sensitivity. The site is considered to exhibit a low to medium sensitivity, as opposed to a moderate sensitivity as ascribed within the Council's Sensitivity Study. This is important given that in allocating sites the Council has taken account of the sensitivity ratings ascribed.
- 7.4 In landscape terms, the study area does not lie in or have any association with any designated area. The site presents an opportunity to create a new and permanent settlement edge with a defensible boundary to the wider countryside in the north.

Green Belt Summary

- 7.5 As discussed in **Section 6**, the findings of the detailed Green Belt review undertaken demonstrate clearly that the site makes a limited contribution to the overall function of the Green Belt. Applying both the Local Authority's Green Belt Study's methodology and EDP's methodology specifically to the site, the site scores as considerably less important in terms of its contribution to Green Belt functions than is stated in the Green Belt study.
- 7.6 The site is influenced by the adjacent residential development to the east. The existing development has an urbanising effect and detracts from the site's open character. Its western boundary forms a distinctive feature within the landscape that could be enhanced to create a permanent boundary to the wider countryside. Additionally, a new vegetated boundary of similar character to the existing vegetation on the site's boundaries could be

introduced to the north of the site. This would have the potential to create a defensible boundary to the Green Belt and a permanent settlement boundary.

- 7.7 The site is essentially a parcel of land contained on three sides by existing boundary features and has minimal contribution in terms of maintaining the openness of the countryside to the north of Wombourne. Limited visibility of the site from the wider countryside suggests that development would have little to no effect on the visual amenity of the site beyond close-range views.

The Potential Development Response

- 7.8 The below principles demonstrate how development on the site could introduce beneficial features to the local landscape and enhance local landscape character and provide appropriate boundary treatment to the settlement edge and the Green Belt. Opportunities include:

- Retain and enhance existing boundary features;
- Connect with allocated land to the north-east and create permanent boundary to the settlement edge;
- Create new vegetated boundary to the north of the site, using similar species to the existing boundary features and linking to the existing green infrastructure network;
- Retain and enhance the dense vegetation at the southern boundary;
- Provide links into local PRow network;
- Provide high quality Public Open Space within the site;
- Restrict potential for wide-ranging visual effects through retention and provision of boundary features and careful siting and height of development; and
- Reflect local housing density, whilst providing much needed housing.

Overall Summary

- 7.9 This Landscape and Green Belt Review forms part of a wider suite of documents prepared by the applicant in support of the promotion of the site through the Local Plan process.
- 7.10 The site is not considered as sensitive as ascribed within the Council's Landscape Sensitivity Study. This study necessarily undertakes an assessment of much larger parcels than the site and has to therefore moderate and combine findings when identifying a singular sensitivity rating. This will inevitably 'underplay' or 'overplay' the sensitivity of certain potential development parcels. In this instance it is considered that the study

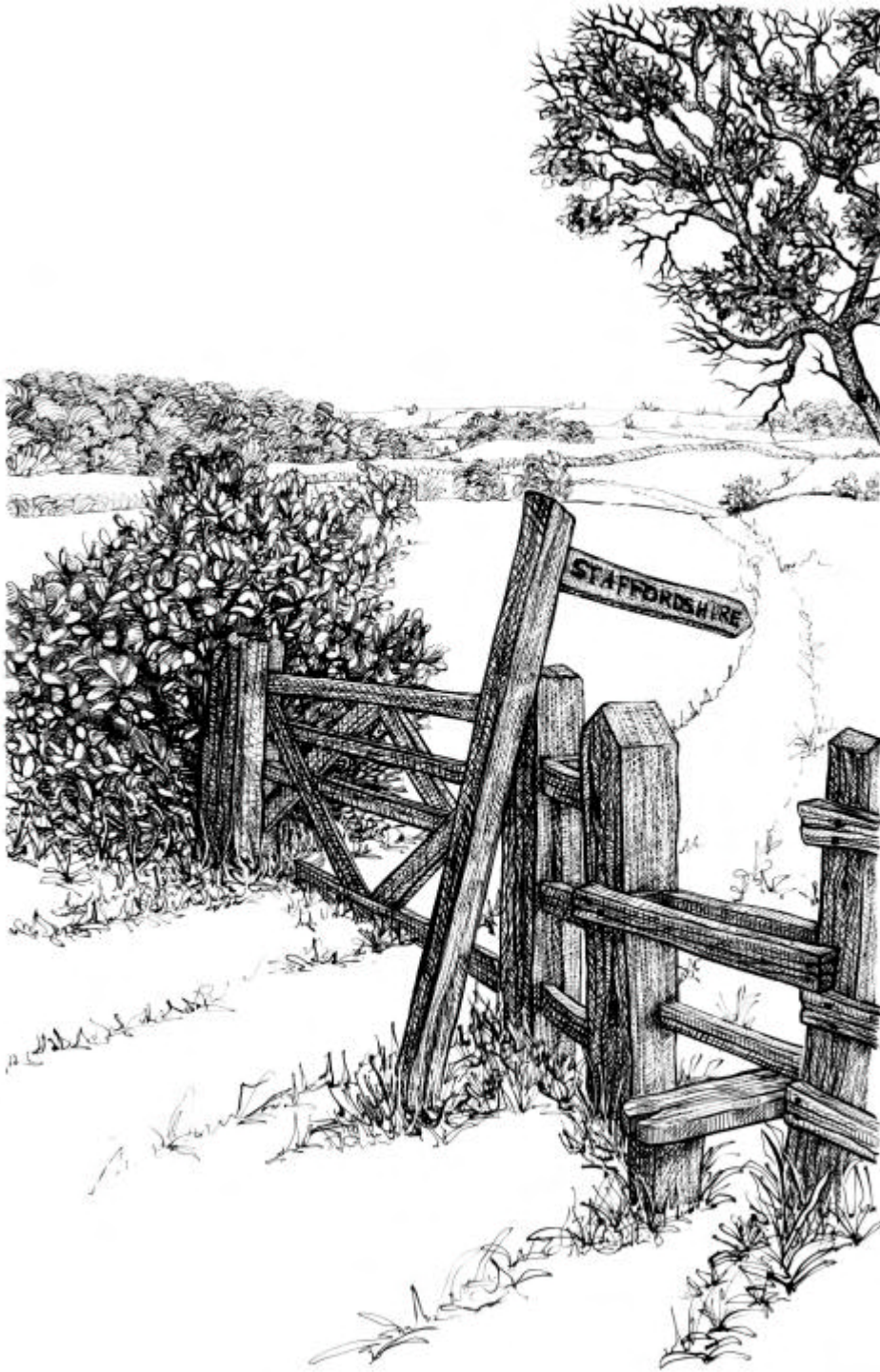
overplays the rating, applying a moderate sensitivity to what is shown through the detailed appraisal undertaken herein to be a low to medium sensitivity parcel of land.

- 7.11 Overall, the site is considered to make a limited contribution to the open character of the wider Green Belt parcel. The site comprises an area of 3ha, which makes up a small area of the whole parcel S53C-S1, which covers an area of 61.85ha. The site does not contribute to a “*strong distinction*” between the wider countryside and the settlement edge, as noted in the Green Belt study. Due to the presence of residential development on its eastern boundary, the site reads as part of the settlement edge. The site’s triangular shape and location between the South Staffordshire Railway Path to the west and residential development in the east reduce its contribution to the open character of the Green Belt.
- 7.12 Due to its small size in relation to the wider Green Belt Parcel, the site’s release from the Green Belt designation would have a very limited impact on the integrity of the Green Belt. The gap between Wombourne and nearby settlements to the north and north-east would remain intact.
- 7.13 There is potential to extend development into the site and form a permanent, new boundary to the settlement edge. Characteristic features, such as a line of trees linking the existing vegetation corridors with each other, could be implemented to form a new defensible boundary to the Green Belt. If considered acceptable for future development, the site offers opportunities to provide GBC measures which would have potential to enhance the quality and accessibility of the local Green Belt land.

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Appendix EDP 1
Findings of EDP Data Trawl

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***Planning for Landscape Change:
Supplementary Planning
Guidance to the
Staffordshire and Stoke on Trent
Structure Plan 1996 – 2011
Landscape Descriptions***



***Planning for Landscape Change:
Supplementary Planning Guidance
to the
Staffordshire and Stoke on Trent
Structure Plan, 1996 – 2011***

***Volume 3:
Landscape Descriptions***

***Staffordshire County Council,
Development Services Department, 2000***

Sandstone estatelands

In its common form, elsewhere in the Structure Plan area, the woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape type.

It has a wide geographic range in those parts of the county where Triassic sandstones are not obscured by drift deposits. Acid sands and brown earths predominate and, whilst some significant remnants of the original heathlands survive, the major land use is now arable cropping in large hedged or open fields of a regular pattern. Settlement is sparse, and characterised by expanded hamlets and wayside cottages. In the single area in the Staffordshire Plain which represents the basic landscape type the former woodlands and parklands have been almost completely lost.

Visual character

This is a gently rolling, featureless landscape where the increasing intensification of the arable farming has led to almost complete destruction of the fabric of the landscape, ensuring that all elements are on view. The degradation of this area is continuing, judging by the present state of the hedgerows and stag headed appearance of the remnant hedgerow oaks. Stream corridors in places provide the only intact landcover elements, giving some structure to this simple landscape.

The original vegetation pattern shows through strongly in the remnants of silver birch woodland and heathland species present in the hedgerows. Recent enclosure of the land is indicated by the ordered nature of a planned functional landscape.

Settlement is characterised by a sparsely settled pattern of expanded hamlets and isolated large farms and estate buildings linked by predominantly straight minor roads. Incongruous features such as modern large farm buildings and poorly designed reservoirs are being introduced into the landscape as a result of farm intensification.

Characteristic landscape features

Silver birch woodlands; well-treed stream corridors; straight roads; intensive arable agriculture in an open remnant field pattern.

Incongruous landscape features

Hedgerow removal along roadsides; field trees; badly designed farm reservoirs; large modern farm buildings and improved commuter properties; power lines.

Factors critical to landscape character and quality

The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, the relatively poor survival of historic elements that contribute to landscape character, such as field, settlement and road patterns, and the very poor survival of characteristic semi-natural vegetation (i.e. heathland and related habitats, and meres and mosses).

This landscape character type is very sensitive to the impacts of development and land use change.

Potential value of new woodland planting

Very high. There is a need in particular for the planting of larger woodlands, to restore the landscape structure of this open featureless arable farmland, to screen or direct views away from

inappropriate development, e.g. reservoirs and modern farm buildings, and to reinforce the remnant heathland character of the landscape.

Potential value of other habitat provision and management

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale:

Habitat type	Objective or target	Priority
Ancient/ semi-natural broadleaved woodland	maintain and enhance	high
	restore degraded sites	high
	recreate/ regenerate	medium
Ancient/ diverse hedgerows	maintain and manage	medium
	maintain trees	medium
Hedgerows	plant species-rich hedges	lower
Arable field margins	maintain, improve and restore	high
Canals, lakes and ponds	maintain and enhance water bodies and catchments	high
	increase the number of such features	high
Lowland wood pasture and parkland	maintain and safeguard	high
	restore degraded sites	high
Peat bogs	maintain and enhance	high
Reedbeds	maintain and create	high
Rivers and streams	maintain and improve the quality and quantity of water	high
	maintain the quality of all natural existing channel features	high

Further details of these habitat targets can be found in the Staffordshire Biodiversity Action Plan.

Specific guidelines

Tree and woodland planting

New planting should tie into existing woodlands or be of sufficiently large scale to be appropriate for the remnant field pattern. Existing tree-lined stream corridors and copses can be consolidated to increase their scale.

Conifers are acceptable in this landscape, but care must be taken with edge treatment. The shape of new woodlands is less important than is fitting them to the existing vegetation pattern, but there are some areas of stronger landform where care should be taken.

Sandstone estatelands: farmlands

This is a variant of the basic landscape type in which traditional landed estates are uncommon. There is little woodland, and very little, if any, of ancient origin.

Visual character

This is a landscape of intensive arable farming, where hedgerow tree cover of oak and occasional ash is sparse and hedgerows are well trimmed and in decline. Many hedgerows have now been removed to increase field size and this has created an open, smoothly textured landscape with extensive views across it. A gently undulating landform results in the landcover elements being viewed as individual components of the landscape and field pattern showing up from elevated viewpoints.

Woodland cover in this medium to large-scale landscape tends to be small-scale broadleaved and conifer plantations. Visually, woodland edges, stream corridors and trees associated with farm buildings provide localised relief and control views.

Characteristic landscape features

Well treed stream valleys; small broadleaved copses; intensive arable farming; hedged field pattern; gently undulating landform.

Incongruous landscape features

Sand and gravel quarrying. Extensive fencing where field pattern is being lost. Improved commuter properties.

Factors critical to landscape character and quality

The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation, in particular heathland and related habitats.

Potential value of woodland planting.

High. There is a particular need for the planting of larger woodlands, to restore a landcover structure to a landscape that has deteriorated due to intensive arable farming.

Potential value of other habitat provision and management

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale:

Habitat type	Objective or target	Priority
Ancient/diverse hedgerows	maintain and manage	very high
	maintain trees	very high
Hedgerows	plant species-rich hedges	lower
Arable field margins	maintain, improve and restore	high
Canals, lakes and ponds	maintain and enhance water bodies and catchments	medium
	increase the number of such features	medium
Lowland wet grassland	maintain and enhance existing areas	medium
	restore degraded areas	medium
	create new areas	lower
Lowland wood pasture and parkland	maintain and safeguard	high
	restore degraded sites	high
Reedbeds	maintain and create	medium
Rivers and streams	maintain and improve the quality and quantity of water	high
	maintain the quality of all natural existing channel features	high
Unimproved neutral grassland	maintain and safeguard existing areas	high
	restore	medium
	link adjacent sites through habitat creation	medium
	create/re-create new areas	lower

Further details of these habitat targets can be found in the Staffordshire Biodiversity Action Plan.

Specific guidelines

Tree and woodland planting

The existing field pattern needs reinforcing by additional hedgerow replanting with hedgerow trees. New woodlands should be designed to the existing remnant - although visually important - field pattern. The scale of planting can vary from small scale adjacent to existing vegetation to large scale planting of field size and above. A species mix of both conifers and broadleaves is acceptable provided care is taken with design of edges.

Appendix EDP 2

EDP Green Belt Assessment Methodology and Criteria

Review Criteria

A2.1 As noted in the NPPF the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allow for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose is described in more detail below.

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

A2.2 This is a test that considers whether the site is able to prohibit sprawl. Commonly, sprawl is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.

A2.3 Sprawl may also be discouraged by defensible boundaries to existing settlements that are either natural (e.g. topography, woodland or water course) or man-made features (e.g. as a main road, main railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries may contribute towards greater openness.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

A2.4 The consideration is whether or not the settlement growth could lead to merging with another town. The wording of the NPPF refers to 'towns', but often the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges to distinct settlement areas that might be defined as towns.

A2.5 In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.

A2.6 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on distance between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- A2.7 In terms of Green Belt, the ‘countryside’ is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space and access to it, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks, properties, mineral extraction or larger areas of settlement.
- A2.8 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the visual context as described above in **Section 2**. Consideration is also given to the extent of recreational access provided to the Green Belt through the site.
- A2.9 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative ‘value’ element to be applied to landscapes.
- A2.10 The matter of ‘encroachment’ is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, sub-stations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A2.11 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A2.12 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded where possible or integrated sensitively into design proposals.

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

A2.13 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the Archaeology and Heritage Assessment allows the assessment to acknowledge that historic cores do exist as indicated by the Royal Tunbridge Wells and Pembury Conservation Areas.

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

A2.14 This purpose falls outside the scope of this report and has not been tested.

Review Scoring

A2.15 EDP has developed a methodology for Green Belt Reviews, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.

A2.16 The site is scored against the criteria for each purpose as shown below, with criteria weighted as no, low, moderate or strong contribution towards meeting the purposes of the Green Belt. Occasionally, scores are spread if part of the site makes differing performances. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt or retained within it.

NPPF Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: No Contribution; <ul style="list-style-type: none"> • Low Contribution; • Medium Contribution; and • Strong Contribution.
Purpose 1 To check the unrestricted sprawl of large built-up areas	<ul style="list-style-type: none"> • Creates a clear, recognisable distinction between urban fringe and open countryside. 	<p>Does the site form an open buffer between the existing settlement edge and the wider countryside?</p> <p>a. Yes, the site is free of development and associated influences and strongly contributes to the openness of the Green Belt (Strong);</p> <p>b. There is an absence of development within the site, but it is overlooked by adjacent/nearby development (Moderate);</p> <p>c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (Low); and</p> <p>d. Land use of the site results in it forming neither countryside or urban (no contribution).</p>
	<ul style="list-style-type: none"> • Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary; and • Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries. Incomplete or low boundaries may result in part/all of a site making a greater contribution to the openness of the Green Belt. 	<p>Does the site have a defensible boundary which can prevent sprawl?</p> <p>a. The site does not have defensible boundaries and maintains openness with the wider Green Belt (strong);</p> <p>b. The site has some defensible boundary/boundaries and maintains openness in some directions. Additional reinforcement needed (Moderate);</p> <p>c. The site has some permanent boundaries such as roads/railways/rivers/high ground and partially defensible boundaries, some of which do not require additional reinforcement (Low); and</p> <p>d. The site has permanent defensible boundaries that would immediately prevent sprawl (no contribution).</p>

NPPF Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: No Contribution; <ul style="list-style-type: none"> • Low Contribution; • Medium Contribution; and • Strong Contribution.
Purpose 2 To prevent neighbouring towns merging into one another	<ul style="list-style-type: none"> • Settlements maintain a recognisable edge; and • The extent to which the site forms a logical fit with the settlement or, is perceived as an extension that could erode openness. 	<p>Is the site well associated with the existing settlement edge?</p> <ul style="list-style-type: none"> a. The site forms the gap between two settlement edges (strong); b. The site abuts two settlement boundaries and therefore forms part of an indent (moderate); c. The site abuts one settlement boundary but is not divorced from it (low); and d. The site is clearly separated from the settlement boundary and would not undermine the sense of openness (no contribution).
	<ul style="list-style-type: none"> • Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography. A larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap; and • The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging. 	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence?</p> <ul style="list-style-type: none"> a. Immediate and clear intervisibility with next nearest settlement edge (strong); b. Partial intervisibility with next nearest settlement edges (moderate); c. Limited intervisibility with next nearest settlement edges (low); and d. No intervisibility with next nearest settlement edges (no contribution).

NPPF Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: No Contribution; <ul style="list-style-type: none"> • Low Contribution; • Medium Contribution; and • Strong Contribution.
Purpose 3 To assist in safeguarding the countryside from encroachment	<ul style="list-style-type: none"> • The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically. 	<p>To what extent does the site represent the key characteristics of the countryside?</p> <ul style="list-style-type: none"> a. The site is highly representative of host landscape character area/type; does not contain landscape detractors (strong); b. The site is partially representative of host landscape character area/type; there are some landscape detractors (moderate); c. The site has a low representation of characteristics; many landscape detractors (low); and d. No representation of landscape character area/type; high number detractors that weaken landscape character considerably (no contribution).
	<ul style="list-style-type: none"> • Encroachment: features such as settlement edge, speed signage and street lighting affect the extent to which the countryside changes from rural to urban. 	<p>To what extent is the site urbanised, either by on-site or off-site features?</p> <ul style="list-style-type: none"> a. There are no urbanising features within the site or directly influencing it (strong); b. There are several off-site urbanising features affecting the site (moderate); c. There are many off-site urbanising features affecting the site (low); and d. The site is distinct due to its urbanising features (no contribution).

NPPF Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: No Contribution; <ul style="list-style-type: none"> • Low Contribution; • Medium Contribution; and • Strong Contribution.
Purpose 4 To preserve the setting and special character of historic towns	<ul style="list-style-type: none"> • The proximity of the site to a heritage designation relates to the historic character of a settlement and whether or not its openness in Green Belt terms is a consideration. 	<p>What is the spatial and visual relationship between the site and the historic core of the nearest towns?</p> <ul style="list-style-type: none"> a. The site is wholly within an historic character area/heritage-related designation (strong); b. The site is adjacent to an historic character area/heritage-related designation (moderate); c. The site has partial intervisibility with an historic character area/heritage-related designation its openness may be a consideration (low); and d. The site does not share a boundary with an historic character area/heritage-related designation and/or there is no intervisibility (no contribution).
Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	<p>Not tested.</p>	<p>Not tested.</p>

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Appendix EDP 3

Green Belt Study Assessment Methodology and Criteria

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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



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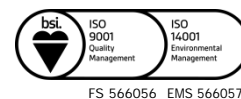
South Staffordshire Green Belt Study

Stage 1 and 2 Report
Prepared by LUC
July 2019

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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 is 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:
- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses; and
 - ii) 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	<p>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</p> <p>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.</p>
Weak/No Contribution	<p>Land that contains urbanising development of a scale, density or form that significantly compromises openness; or</p> <p>Land which is too influenced and contained by urban development to retain any significant relationship with the wider countryside.</p>

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

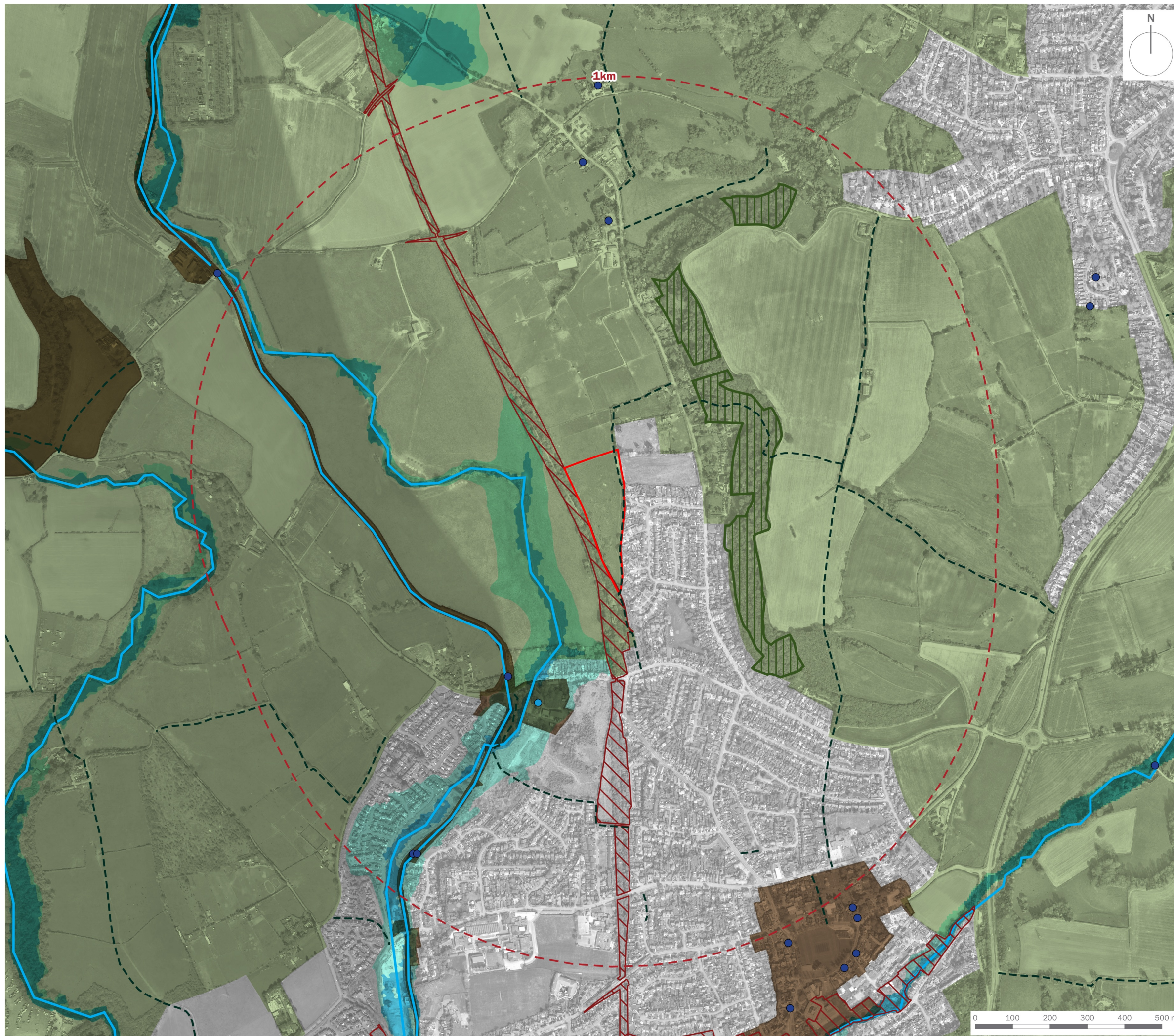
Analysis of variations in contribution to Green Belt purposes

- 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.

Plans

- Plan EDP 1** Site Context and Designations
(edp7419_d001b 10 December 2021 JTF/LTi)
- Plan EDP 2** Green Belt Context
(edp7419_d002 10 December 2021 JTF/LTi)

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- Site Boundary
- 1km Detailed Study Area
- Green Belt
- Public Rights of Way (PRoW)
- Water Courses
- Local Nature Reserves
- Conservation Areas
- Listed Buildings
- Grade II*
- Grade II
- Ancient Woodland
- Flood Zone 2 (Environment Agency)
- Flood Zone 3 (Environment Agency)

client
Bellway Homes Ltd

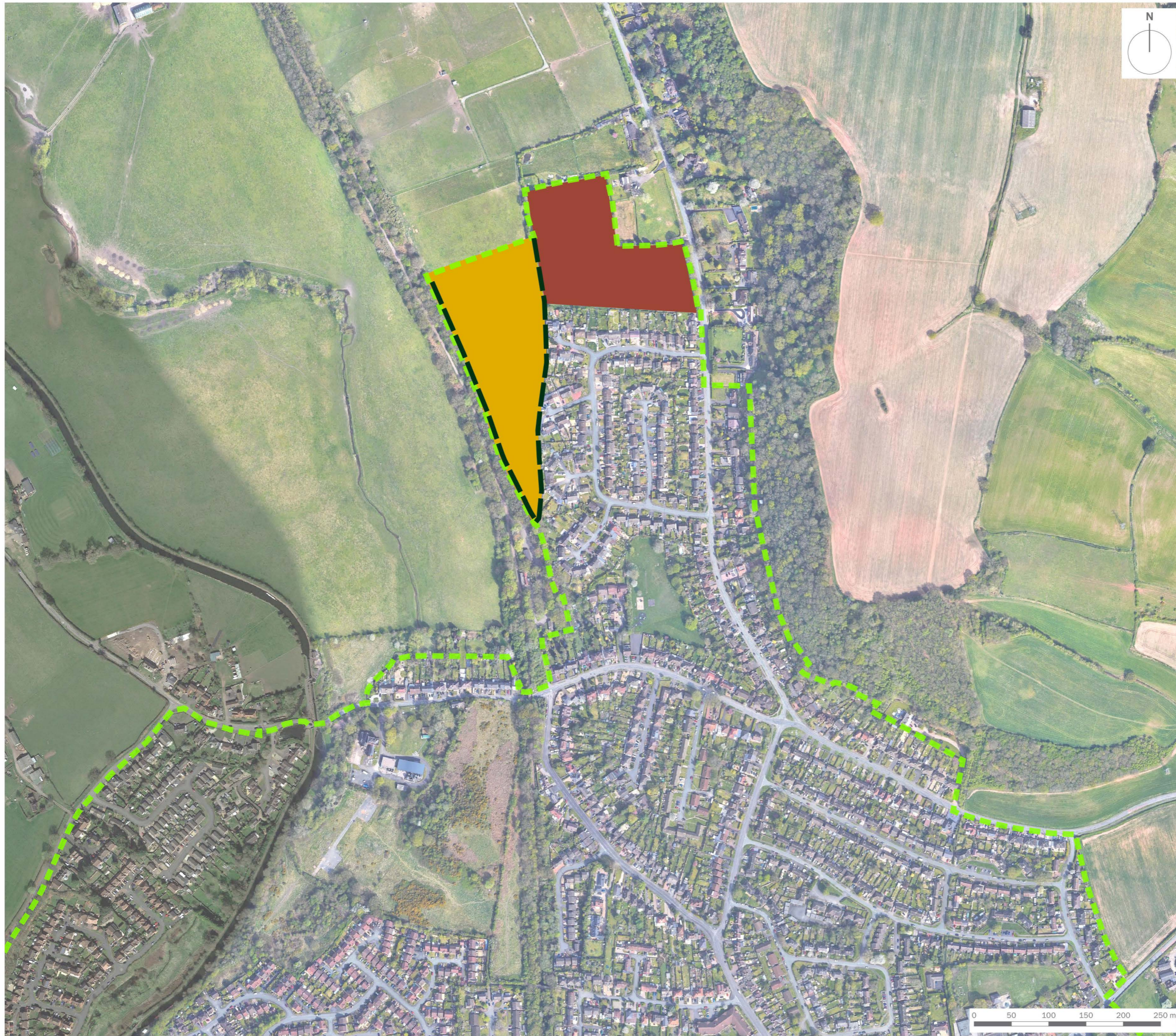
project title
Land at Wombourne





drawing title
Plan EDP 1: Site Context and Designations

date	10 DECEMBER 2021	drawn by	JTF
drawing number	edp7419_d001b	checked	LTI
scale	1:10,000 @ A3	QA	RB



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-  Potential Green Belt Boundary
-  Existing Green Belt Boundary
-  Allocation 416
-  Site 708 (as defined in the South Staffordshire Council SHELAA)

client
Bellway Homes Ltd

project title
Land at Wombourne

drawing title
Plan EDP 2: Green Belt Context

date **10 DECEMBER 2021** drawn by **SW**
drawing number **edp7419_d002** checked **LTI**
scale **1:5,000 @ A3** QA **GY**



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