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## GREEN BELT TECHNICAL NOTE

ON BEHALF OF

BARRATT WEST MIDLANDS

FOR

LAND WEST OF BARNHURST LANE,

BILBROOK,

SOUTH STAFFORDSHIRE

---

*V2 December 2021*



## CONTENTS

1.	INTRODUCTION	3
2.	THE PURPOSE OF THIS GREEN BELT POSITION PAPER	4
3.	BACKGROUND TO THE GREEN BELT DESIGNATION	5
4.	CURRENT GREEN BELT ASSESSMENT UNDERTAKEN BY THE LOCAL PLANNING AUTHORITY	7
5.	SITE SPECIFIC GREEN BELT ASSESSMENT	8
6.	SUMMARY OF COMPARTAIVE ASSESSMENT: EASTERN EDGE OF BILBROOK	20
7.	SUMMARY OF COMPARTAIVE ASSESSMENT: BILBROOK AND THE WIDER AREA OF CODSALL	22
8.	CONCLUSION	24

## APPENDICES

APPENDIX 1 – COMPARATIVE ASSESSMENT EASTERN EDGE OF CODSALL

APPENDIX 2 – COMPARATIVE ASSESSMENT WIDER AREA OF CODSALL

APPENDIX 3 – PUBLISHED METHODOLOGY FOR GREEN BELT REVIEW PART ONE AND PART TWO (2019)

APPENDIX 4 – SITE LOCATION PLAN

## Document History

Rev	Purpose	Author	Checked	Date
V1	Information. Draft for Client Review	JB		06.08.21
V2	Information following Client Review	JB		09.12.21



## 1. INTRODUCTION

### Introduction

- 1.1. Zebra Landscape Architects ('ZLA') has been commissioned by Barratt West Midlands (the 'Promotor') to prepare Green Belt Position Note. This document appraises the Green Belt function of land west of Barnhurst Lane, Bilbrook, South Staffordshire (the 'site'), and also includes a comparative assessment of further land parcels surrounding the settlement.
- 1.2. This Position Paper facilitates an independent technical evidence base for ongoing discussion for the site's promotion through the Local Planning process. The assessment was informed by a desk-based review of available data, policy, landscape character publications and mapping. A site visit was undertaken by an experienced Chartered Landscape Architect in July 2021.
- 1.3. The site is situated entirely within the administrative area of South Staffordshire District Council, which is the Local Planning Authority (the 'LPA'). The site is located west of Barnhurst Lane on the periphery of Bilbrook, and is found at OS Grid Reference: SJ 88709 02900 (site centre).
- 1.4. The site being promoted is approximately 8.79 Hectares, and is entirely situated within the West Midlands Green Belt. The Promotor is currently considering the feasibility of promoting this land parcel for new residential development through the Local Plan process, and this document informs their understanding and discussions around opportunities and constraints.
- 1.5. Zebra Landscape Architects is part of the wider Zebra Consultancy Group providing independent development consultancy and advice to landowners, land promoters and development clients in the public and private sectors. We work in the fields of landscape, ecology, arboriculture, masterplanning and architecture. The Practice operates throughout the UK from offices in Worcester and central London.

### Offsetting and Compensation for Green Belt Release

- 1.6. The NPPF includes the following requirements on how Green Belt release should be managed:  
  
'Paragraph 142. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'
- 1.7. The clear intention of the NPPF is that release of Green Belt land should not proceed without exceptional circumstances suitable off-site enhancement which reinforces Green Belt character and quality. The second part of the LPA's Green Belt Review explored *'the opportunities for links to be made with how Green Infrastructure might be used to help mitigate the effects of development on the visual and spatial openness of the Green Belt.'*



## 2. THE PURPOSE OF THIS GREEN BELT POSITION PAPER

2.1. Given the foregoing, the purpose of ZLA's work is to advance the current understanding of the Green Belt considerations and provide evidence of the suitability of the site for sustainable development in this regard. In particular the report includes the following key appraisals:

- **Appraisal One:** To appraise the Green Belt function of the site relative to Green Belt roles 1-5 to determine an overall contribution which the site makes individually. ZLA followed the LPA's methodology published within the 2019 South Staffordshire Green Belt Study to undertake a site specific appraisal (rather than the wider tract of land appraised in Part One of the LPA's Green Belt Study, 2019).
- **Appraisal Two:** Utilising the LPA's published methodology, ZLA determined the potential of harming the function and integrity of the wider Green Belt through the removal of the site for development;
- **Appraisal Three:** To appraise the site and its landscape and visual context, and appraise the visual and physical openness of the landscape, and the intactness (representation) of landscape character relative to the site; and
- **Appraisal Four:** To consider the boundary resilience of the site. With consideration of 'Chapter 13: Protecting Green Belt land' of the Revised NPPF (July 2019), it is possible to review the site in a wider sense (relative to the Revised NPPF) to deliver a well-rounded and robust opinion of the site's release from the Green Belt. Ideally, these features are clearly defined on the ground, and perform a physical and/or visual role in separating town and countryside.

2.2. ZLA has adopted the LPA's assessment methodology to individually appraise the site's function and contribution to Green Belt. This approach ensures a consistent and robust approach has been taken.

2.3. For the purpose of assessing harm to openness there are likely to be visual as well as spatial effects on the openness of the Green Belt, and, if so, whether those effects are likely to be harmful or benign. Consequently, the degree to which a scheme affects openness in landscape terms is an important matter which needs to be addressed through this Position Paper.

2.4. Openness has a landscape dimension which needs to be assessed; hence the second initiative above. In combination with the wider findings of this Position Paper, ZLA will demonstrate whether the effect of removing the site from the Green Belt (and its subsequent development) would lead to harmful or benign effects.

2.5. Further to this, the NPPF advocates enhancement of Green Belts, stating (para. 145) that: 'local planning authorities should 'plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.'

2.6. The NPPF (para. 142) also requires local authorities, as part of the revision of Green Belt boundaries, to: 'set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'



### 3. BACKGROUND TO THE GREEN BELT DESIGNATION

- 3.1. The West Midlands Metropolitan Green Belt was conceived to control urban form, and the purposes of a GB around urban areas were set out in 1955 by the Ministry of Housing and Local Government as being:
- ‘To check the further growth of a large built up area;
  - To prevent neighbouring towns from merging into one another; and
  - To preserve the special character of a town.’
- 3.2. The West Midlands Metropolitan GB is a statutory GB environmental and planning policy that regulates the rural space within the West Midlands region of England. The Land area taken up by the belt is 224,954 hectares (ha), which is 0.5% of the total land area of England (as calculated in 2010). The vast coverage of the belt completely envelops the county.
- 3.3. The Government formerly set out its policies and principles towards GBs in England and Wales in Planning Policy Guidance Note 2: Green Belt, but this planning guidance was superseded by the NPPF in March 2012, and has been subsequently superseded with the revised NPPF (July 2018 and February 2019), and most recently by the Revised NPPF (July 2021). There is now more detailed guidance in the National Planning Policy Guidance (NPPG) that deals with ‘compensatory provision’.
- 3.4. Paragraph 142 states: ‘Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.’ Planning Authorities are strongly urged to follow the Revised NPPF’s detailed advice when considering whether to permit additional development in the GB.
- 3.5. ‘Openness’ and ‘permanence’ are essential characteristics of the GB and they contribute to the fundamental aim of the GB policy, to prevent urban sprawl by keeping land permanently open. The NPPF requires land to demonstrate that it meets one or more of five ‘tests’ of GB designation, which are set out at Revised NPPF (July 2021), paragraph 138 as follows:
- ‘To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;
  - To preserve the setting and special character of historic towns; and
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.’
- 3.6. The Revised NPPF, paragraph 140 (July 2021) says that: ‘once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.’



- 3.7. Provisionally, this Position Note considers the extent to which the site fulfils the aforementioned five Green Belt purposes. In doing so, ZLA have been minded ensuring that any revision to the Green Belt provision must *'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'*, as well as, ensuring any new boundaries are: *'define boundaries clearly using physical features that are readily recognisable and likely to be permanent'* (Revised NPPF, July 2021, paragraph 143).
- 3.8. The Green Belt was first proposed within the West Midlands during the 1950's. It was devised principally as a means through planning policy of preventing the outward expansion of the built up area of the West Midlands into open countryside and towards the series of freestanding towns and villages surrounding the main West Midlands urban area.
- 3.9. Current guidance within the NPPF is clear that the Green Belt is a strategic planning tool which primarily seeks to prevent the spread of development into the countryside and the coalescence of urban areas. However, the Framework is clear that the Green Belt boundaries will need to be considered within local authority areas through the 'plan making' process.
- 3.10. Once Green Belts have been defined the NPPF requires local planning authorities to plan to positively enhance the beneficial use of the Green Belt, including providing opportunities for access, outdoor sport and recreation, retain and enhancement of landscapes, visual amenity, biodiversity and to improve damaged and derelict land (paragraph 145).



## 4. CURRENT GREEN BELT ASSESSMENT UNDERTAKEN BY THE LOCAL PLANNING AUTHORITY

- 4.1. The Local Planning Authority undertook a Green Belt Review of land within its administrative authority. The review was published in July 2019 and was entitled the 'South Staffordshire Green Belt Study Stage 1 and 2 Report'.
- 4.2. This review was undertaken independently by an expert third party, who were appointed in 2018 to 'undertake an assessment of the Green Belt for the City of Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country) and South Staffordshire.' The study provides an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities and South Staffordshire.
- 4.3. The Green Belt Study undertake two stages of assessments:
  - Stage 1 draws out strategic variations in the 'contribution' of Green Belt land to the Green Belt purposes as defined in the National Planning Policy Framework (NPPF). This has regard to the wider context of Green Belt land within the South Staffordshire, and neighbouring authorities. At the end of Stage 1, strategic parcels of Green Belt land were defined which draw-out variations in the contribution of Green Belt land in relation to the five Green Belt purposes.
  - Stage 2 of the study included a more focused assessment of the potential 'harm' of removing land from the Green Belt. The assessment area covers all unconstrained Green Belt land within South Staffordshire. Within the tracts of land identified by this study, previously promoted land parcels are identified and referenced. These land parcels promoted through the previous round of Call for Sites pre-dates the preparation of the 2019 South Staffordshire Green Belt Study Stage 1 and 2 Report. These promoted sites are considered as part of the Comparative Assessment provided in Section 6 and 7 of this Green Belt Position Note and their corresponding appendices, Appendix 1 and 2.



## 5. SITE SPECIFIC GREEN BELT ASSESSMENT

- 5.1. This Green Belt Assessment has been undertaken by an appropriately qualified Landscape Architect and follows the assessment criteria and the LPA's published methodology. The criteria for each purpose are described in more detail below.

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

- 5.2. This is a test that considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development, but may also be piecemeal development in isolated areas or along settlement edges. A site may have already 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.

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

**Purpose 2:** To Prevent Neighbouring Towns Merging into One Another

- 5.4. The wording of the NPPF refers to 'towns', but in the context of this assessment study area, 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 as well as distinct settlement areas which might be defined as towns. 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.

- 5.5. 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 the extent of openness between two settlements and each situation needs to be reviewed in relation to the local landscape and visual (and green belt) context.

**Purpose 3:** To Assist in Safeguarding the Countryside from Encroachment

- 5.6. In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, 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, 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 or isolated properties, or even larger areas of settlement.

- 5.7. This assessment is based on the key landscape characteristics of the site and its surroundings as well as the visual context, as described above.

- 5.8. 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.





- 5.9. The matter of ‘encroachment’ is also a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site which has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 5.10. 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.
- 5.11. 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.

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

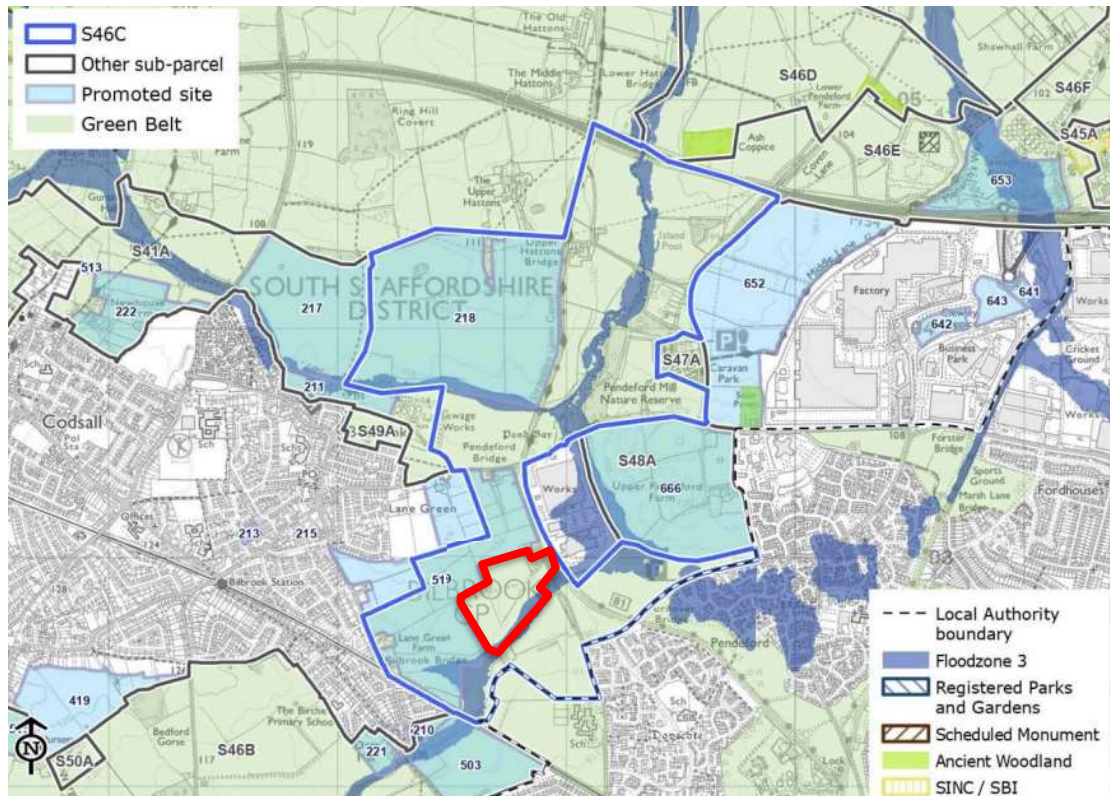
- 5.12. As set out in the Council’s appraisal of land tract in which the site is situated, there is ‘*no direct role given the location of the parcel away from historic towns*’. Also ZLA notes from its field-based assessment, the parcel has no physical or visual connection with a Conservation Area. Individually, the site is situated outside of any existing settlement which has a Conservation Area, and does not contain any Listed Buildings. The site is situated outside of and not adjoining any Registered Park and Garden or wider designed or non-designated heritage assets.

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

- 5.13. ZLA concurs with the LPA, that the land parcel S46 , and the site have ‘no direct role given the location of the parcel away from areas requiring regeneration.’
- 5.14. ZLA’s site specific appraisal is detailed as follows. The site’s location within the land tract S46 on the eastern edge of Bilbrook is indicated on Image 5.1 overleaf. N.B. See Appendix 4 for the Site Location Plan.



Image 5.1: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 557. N.B. The approximate location and quantum of the site is illustrated with a solid red line with land tract S46 which was appraised by the Local Planning Authority in the aforementioned Green Belt Review



#### Appraisal One: Green Belt Contribution

- 5.15. The grading of overall scores reflect the contribution the site makes towards meeting the purposes of the Green Belt. 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. The LPA's methodology utilised criterion in assessing each Green Belt role. The finding of ZLA's Appraisal One is presented in the Green Belt Assessment Table; see Table 5.1 overleaf:



Table 5.1: Part One Green Belt Assessment of the individual site – grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for the site area	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas</i></p>	<p><i>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</i></p> <p>The site is situated inside, and sandwiched between, main vehicle route running between Bilbrook and Codsall including the Pendeford Mill Lane and Barnhurst Lane. Beyond the site's eastern edge is Barnhurst Land with the Staffordshire Worcestershire Canal running parallel north to south. There is extensive employment/industrial built form and land use immediately east of this location (discernible from the site). There is a strong tree belt to the east and south of the site with scattered residential built form aligned with Barnhurst Lane. The River Penk runs from east of Barnhurst Lane and along the site's southern edge create a further physical boundary to the site. These features contain the site from the wider typical countryside to the north and east of the site's location. The site is enclosed a combination of several physical features which are extensive and long standing creating a durable edge. The site is situated sandwiched within these physical features and contained by these urban features. However, these features are situated outside of, and bound the site robustly preventing sprawl between Codsall and outlying settlements.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 2: To prevent neighboring towns from merging into one another</i></p>	<p><i>Does the parcel lie directly between two settlements and form all or part of a gap between them?</i></p> <p>The site plays no role due to the distance between the West Midlands Conurbation and Albrighton, its nearest neighboring town.</p>	<p>No Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment</i></p>	<p><i>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</i></p> <p>Wider open countryside is situated beyond durable physical features which enclose the fields limiting intervisibility and connectivity. The long-standing settlement edge and residential curtilages of Codsall is discernible from within the site's interior. There are direct and obvious views towards the recently completed and still being built out residential dwellings north west of the site (south of Pendeford Mill Lane). The site contains the characteristics of open countryside (i.e., the site does not contain existing built form), but there are significant elements of degraded and missing field hedgerows and limited scattered hedgerow trees (typical feature of the host landscape character area). Through direct views of existing and new residential development and the enclosed site boundaries (east and west severing visibility with the wider open countryside) the site has a stronger relationship with the urban setting.</p>	<p>Moderate Contribution</p>



<p><i>GB Purpose 4: To preserve the setting and special character of historic towns</i></p>	<p><i>What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?</i></p>	
	<p>The site does not contribute to the setting or special character of a historic town.</p>	<p>No Contribution</p>
<p><i>GB Purpose 5: To assist in urban regeneration by encouraging the recycling of the derelict land</i></p>	<p><i>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?</i></p>	
	<p>The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.</p>	<p>Strong Contribution</p>
<p>Overall Contribution:</p>	<p>ZLA finds that notwithstanding Green Belt purpose 5, the site performs a limited role in terms of Green Belt function of less than Moderate overall. The site is sandwiched within durable physical features which enclose and sever connectivity and intervisibility with the wider open countryside. There are direct and obvious views of long-established residential development within Bilbrook, as well as the recently completed residential scheme neighboring the site (Bloor Homes)</p>	<p>Moderate Contribution</p>



**Appraisal Two:** Potential Harm to the wider Green Belt

**Table 5.2: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt**

Criteria	ZLA's Assessment for the site area	Grading
Purpose 1:	<i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i>	
	The recently completed (and still being constructed) residential development south of Pendeford Mill Lane has expanded Bilbrook easterly toward the site. There are limited and less than robust physical boundaries containing this development. There is strong intervisibility of the existing urban features and built within the site as the discernibility of these features extend through the site, but limited by the existing tree groups and robust woodland block to the east and south. This weakens the integrity of the adjacent Green Belt within which the site is situated as the existing urban edge is experienced as raw and incongruous at its closest location. The release of the site from the Green Belt would afford an opportunity for a consistent boundary treatment to Bilbrook, and consequently, contain development within long-established robust physical features of roadways, canal route, the River Penk, extensive tree groups and woodland blocks. This would not weaken the integrity of the adjacent Green Belt.	Moderate Harm
Purpose 2:	<i>How strong would the remaining settlement gap be if the Green Belt land were released?</i>	
	The site plays no role due to the distance between the West Midlands Conurbation and Albrighton, its nearing neighboring town. Through the release of the site from the Green Belt the situation would remain unchanged.	Low to Moderate Harm
Purpose 3:	<i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i>	
	The site is sandwiched within durable physical features which enclose and sever connectivity and intervisibility with the wider open countryside. There are direct and obvious views of the existing settlement of Codsall and recently completed residential dwellings neighboring the site. Additionally, land to the north and west of the site is allocated by Policy SA1 – Strategic development location: Land East of Bilbrook. SA1 will extend Bilbrook eastwards towards Barnhurst Lane for over 800 new homes. This land will be removed from the Green Belt. To ensure that Land East of Bilbrook is deliverable when required, the SPD will be adopted in the early years of the plan period. Given the foregoing, the release of the site (for development) would represent (at worst) Low Harm	Low Harm
Overall Harm:	ZLA finds that the release of the site from the Green Belt would represent (at worst) Moderate harm. Its release would not weaken the Green Belt boundary as the site is enclosed a combination of several physical features which are extensive and long standing creating a durable edge. If the Green Belt is re-aligned to these features, it would be more robust and consistent in creating a distinction between urban and open countryside. The recently built out residential development (south of Pendeford Mill Lane) and the delivery of the Land East of Bilbrook (Policy SA1 – Strategic development location) would remove existing land from the Green belt creating a development, urban context for the site.	Low to Moderate Harm



**Appraisal Three:** Landscape and Visual Context

- 5.16. Through consideration of our field-based assessment ZLA undertook our own test for visual and physical openness and appraised the quality of the site’s existing boundaries; see Table 5.3:

**Table 5.3: ZLA’s Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for the site area
<i>Visual Openness:</i>	Overall, ZLA finds that the site is open in its nature with broad views across its quantum of each field. However, there are limited long range views across broad, open countryside discernible as the site is enclosed to its eastern and southern boundary. There are direct and obvious views from the site’s interior to the existing settlement edge of Bilbrook and the neighboring new residential development north west of the site. N.B. The delivery of Land East of Bilbrook (Policy SA1 – Strategic development location) would reduce the visual openness within the Green Belt extending the existing urban edge eastwards to adjoin the site’s edge. This matter can be offset by the development of Public Open Space, Green Infrastructure and informal landscaping with the Green Belt as part of the emerging masterplan for Promotion. This land use would, in my opinion, not constitute inappropriate development in the Green Belt. Greenness is a visual quality; part of the idea of the Green Belt is to relieve the prospect of unrelenting urban sprawl. The reference in para 145 to planning positively to ‘retain and enhance landscapes, visual amenity and biodiversity’ in the Green Belt makes it clear that the visual dimension of the Green Belt is an important part of the point of designating land as Green Belt.
<i>Physical Openness:</i>	The site contains a small level of existing residential built form with their domestic curtilages and amenity landscaping. The site is two agricultural fields. The site is extensively enclosed by mature tree groups and robust woodland (and the River Penk) to the east and south respectively. The delivery of Land East of Bilbrook (Policy SA1 – Strategic development location) would reduce the spatial openness within the Green Belt extending the existing urban edge eastwards to adjoin the site’s edge.
<i>What is the relationship between the nearest settlement and the surrounding Green Belt?</i>	The surrounding Green Belt creates an extensive area of Green Belt which surrounds Bilbrook. To the east, Green Belt is less contiguous and expansive as within pockets between long-standing urban features including the extensive employment/industrial built form and land use east of the Staffordshire Worcestershire Canal which neighbors the site.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	No Public Right of Way passes through the site area.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.



<i>Intactness of host landscape character?</i>	Limited intactness. There are significant elements of degraded and missing field hedgerows and limited scattered hedgerow trees (typical feature of the host landscape character area).
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#### Appraisal Four: Boundary Resilience

- 5.17. With further consideration of 'Chapter 13: Protecting Green Belt land' of the Revised NPPF (July 2021), it is possible to review the site in a wider sense (relative to the Revised NPPF) to deliver a well-rounded and robust opinion of the site's release from the Green Belt.
- 5.18. Paragraph 142 states the following:
- 'When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.....They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'
- 5.19. Paragraph 143 states the following (pertinent to this Green Belt review):
- 'When defining Green Belt boundaries, plans should where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'
- 5.20. With regard to this paragraph (NPPF paragraph 143), it is recognised that there are benefits in 'using physical features that are readily recognisable and likely to be permanent' or the re-alignment of Green Belt boundaries. Ideally, these features are clearly defined on the ground, and perform a physical and/or visual role in separating town and countryside.
- 5.21. It is ZLA's firm opinion that robust, defensible boundaries are key to feasible Green Belt release by providing a fixed and permeant edge for re-aligning the Green Belt so that it is not altered in future years. In some cases, this purposeful act of realignment of Green Belt to these features, can result in less incongruous development edges that can be seen currently in parts of England.
- 5.22. Furthermore, such a consideration ensures that Local Authorities can identify the most essential Green Belt land area and prioritise land parcels which could be legitimately released from the Green Belt with the minimal amount of harm.
- 5.23. With consideration of the foregoing, ZLA considers the implication of removing the site from the Green Belt and its subsequent development. This appraisal in line with the methodology published by the LPA in their Green Belt Review Study (2019); see Table 5.4 overleaf:





Table 5.4: ZLA’s Assessment of boundary resilience

Evaluation Question	ZLA comments for the site area
<p><i>Significance and permanence of boundaries:</i></p>	<p>The site is situated inside, and sandwiched between, main vehicle routes to the east of Bilbrook including the Pendeford Mill Lane and Barnhurst Lane which robustly enclose the settlement of Bilbrook and land within its curtilage. Beyond the site’s eastern edge is Barnhurst Land with the Staffordshire Worcestershire Canal running parallel north to south. There is extensive employment/industrial built form and land use immediately east of this location (discernible from the site). There is a strong tree belt to the east and south of the site with scattered residential built form aligned with Barnhurst Lane. The River Penk runs from east of Barnhurst Lane and along the site’s southern edge create a further physical boundary to the site. These features contain the site from the wider typical countryside to the north and east of the site’s location.</p> <p>Land East of Bilbrook (Policy SA1 – Strategic development location) would remove existing land from the Green belt creating a development, urban context for the site. This would have a permanence. Overall, these features are a mixture of manmade and natural including vehicle routes, river and canal route . If the Green Belt is re-aligned to these features, it would be more robust and consistent in creating a distinction between urban and open countryside beyond.</p>

**Summary for Site**

- 5.24. This appraisal has been undertaken in line with the published methodology within the LPA’s South Staffordshire Green Belt Review (Part One and Two), 2019.
- 5.25. The site was appraised as part of the wider land parcel S46, which totals 776 Hectares. The site represents 1/100th of this area (circa. 7 Hectares). The LPA found that this land parcel area performed between a weak to Strong Green Belt function, asserting Strong Contributions for Green Belt Role 1, 3 and 5 i.e. checking unrestricted sprawl, safeguarding the countryside from encroachment and for encouraging the recycling of derelict land.
- 5.26. Additionally at Part Two of the LPA’s Green Belt Review (2019), the LPA considers that the release of land east of Bilbrook would harm the integrity of the wider Green Belt to a Very High extent. The LPA asserts the following (for a sub-parcel of the wider Land Parcel S46):
 

‘.....makes a strong contribution to preventing sprawl of the West Midlands contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the countryside. The sub-parcel lies between the western suburbs of Wolverhampton, the inset Balliol Business Park and the inset settlement of Bilbrook (Codsall), and the wooded River Penk corridor running through the sub parcel plays a key role in the separation of Bilbrook and Wolverhampton. Therefore the release of this land would significantly change the existing settlement boundaries and constitute a significant weakening of the Green Belt.’
- 5.27. The above assessment provides an independent review of the site in respect of the 5 national purposes of Green Belt, in addition to the local purpose of maintaining settlement character. When compared to the LPA’s 2019 Green Belt review of land tract S46, this site specific appraisal has enabled a better understanding of the site’s Green Belt function; see Table 5.5:



**Table 5.5: Summary of Assessment of Parcel Contribution to Green Belt Purposes (Green Belt Review)**

Purpose	South Staffordshire Green Belt Review for S46 (2019) (area 770 Hectares plus)	ZLA's Site Specific Appraisal (2021) (are circa 7 Hectares)
<u>GB Purpose 1:</u> <i>To check the unrestricted sprawl of large built-up areas</i>	Strong Contribution	Moderate Contribution
<u>GB Purpose 2:</u> <i>To prevent neighboring towns from merging into one another</i>	No Contribution	No Contribution
<u>GB Purpose 3:</u> <i>To assist in safeguarding the countryside from encroachment</i>	Strong Contribution	Moderate Contribution
<u>GB Purpose 4:</u> <i>To preserve the setting and special character of historic towns</i>	No Contribution	No Contribution
<u>GB Purpose 5:</u> <i>To assist in urban regeneration by encouraging the recycling of the derelict land</i>	Strong Contribution	Strong Contribution

5.28. Notwithstanding Green Belt Role 5 which the LPA appraise all land as having a Strong Contribution, ZLA finds that the site has at most a Moderate Contribution. The anticipated harm to the function and integrity of the Green Belt was considered as part of Green Belt Review Part Two, and ZLA's site specific review found the following; see Table 5.6:

**Table 5.5: Summary of Assessment of Harm From Release of Land from the surrounding Green Belt (Green Review Part Two)**

Purpose	South Staffordshire Green Belt Review for S46b (2019) (area of 280 Hectares)	ZLA's Site Specific Appraisal (2021) (area circa 7 Hectares)
<i>Release of land from the Green Belt</i>	High Harm	Moderate Harm

5.29. ZLA considers the parcel S46 is too large an assessment parcel to accurately assess the sites under consideration. It is unable to reflect the varying land uses as well and robust physical boundaries and features which area situated on the eastern edge of Bilbrook (which neighbour and enclose this site), as well as the varying levels of 'countryside' character, intactness of landscape character or intervisibility across the wider area.

5.30. In particular through sub-dividing this land parcel (S46), the Local Planning Authority's Green Belt review does not recognise that certain sections of the appraised Green belt are more isolated and detached from Bilbrook.



- 5.31. In these situations, the land parcel is removed from the settlement edge through the combination of physical feature and robust boundaries which could be utilised for re-aligning Green Belt boundaries. This is further heightened by an inconsistent Green Belt boundary. These situations are commonly seen around the north and north eastern edge of land tract S46, and further noted within the comparative assessment for land parcels to the west and north of Bilbrook; see Section 7 and Appendix 2.
- 5.32. Again, this is an example of the parcel being insufficiently fine grain to make an accurate assessment, and instead rely on a broad-brush appraisal and ‘averaging’ of characteristics
- 5.33. Given the foregoing appraisal, ZLA considers that the feasibility of this site as a candidate for Green Belt release is strong. There is strong intervisibility of the existing urban features and built form from within the site. Further to this, the development of the SLA1 (‘Land east of Bilbrook’) strategic development will extend housing development eastwards to adjoin and wrap around the site area’s northern and western edge.
- 5.34. The site will be situated within the robust physical features enclosing the site and the existing roadway (Barnhurst Lane) and the navigational canal. Intervisibility and interconnectivity with the wider open countryside will be severed by these existing features and the land would be overlooked by new residential development, consequently, the site area will have a stronger relationship with the urban settlement rather than the open countryside emphasising the site’s urban edge location, which would become more obvious through the implementation of SLA1 (‘Land east of Bilbrook’) strategic development.



## 6. SUMMARY OF COMPARTATIVE ASSESSMENT: EASTERN EDGE OF BILBROOK

### Introduction

- 6.1. There are a number of land parcels on the periphery of Bilbrook with which comparisons can be drawn in relation to site size, character and scale to that of the site, and which could be considered for Green Belt release and future development.
- 6.2. As discussed at Section 1 of this Green Belt Technical Note, we have undertaken a comparative assessment of land most recently promoted for residential development within the Green Belt. These land parcels are also highlighted in the published South Staffordshire Green Belt Review (2019), although like the site not individually appraised.
- 6.3. As these land parcels are being actively promoted for development, ZLA considers that these are the key sites in respect of preparing a concise comparative assessment. Initially, in this section we have considered land parcels situated on the eastern periphery (north eastern to south eastern edge to Codsall). Within the following Section 7 appraised land parcels within the wider area surrounding Bilbrook, including those land parcels highlighted in the LPA's South Staffordshire Green Belt Review (Part One and Two), 2019 to the north of Bilbrook and west of Codsall.

### Comparative Assessment to the eastern edge of Codsall

- 6.4. In Stage Two of their 2019 Green Belt Review, the LPA split the wider land parcel S46 down into a series of sub parcels. Sub parcel S46c includes the site area and is situated to the north east to east of Codsall. Sub parcel S46b is located to the south east of Codsall. These two sub parcels total in excess of 500 Hectares; 280 Hectares and 225 Hectares respectively. The site is approximately 1/70th of the total area.
- 6.5. Within these sub parcels, there are a number of land parcels which have been previously promoted to the LPA as part of the Call for Site (pre-2019) which the LPA's Green Belt Review also considered. A number of these are quite small in quantum, and in this comparative assessment, we have only appraised promoted sites of similar, or greater quantum to the site. Within land parcel S46b this included:
  - Site Promotion ref: S46b 503;
  - Site Promotion ref: S46b 510; and
  - Site Promotion ref: S46b 512.
- 6.6. Within land parcel S46c promoted sites are:
  - Site Promotion ref: S46c 218; and
  - Site Promotion ref: S46c 519.

N.B. The land parcel formerly promoted to the Local Planning Authority (ref: 519) is the land within the SA 1 - Strategic development location: Land East of Bilbrook. Accordingly, this land parcel has not been appraised.

- 6.7. Similar to the site, the above land parcels are situated on the eastern periphery of Codsall. In line with our review of the site, ZLA has undertaken a four stage appraisal of these sites as a comparative assessment; see Appendix 1 of this Green Belt Technical Note.



6.8. For continuity the appraisal of these land parcels have been undertaken in line with the published methodology within the LPA’s South Staffordshire Green Belt Review (Part One and Two), 2019. A summary of ZLA’s Green Belt assessment for these land parcels is included below:

**Summary of Comparative Assessment to the eastern edge of Codsall**

6.9. The appraisal contained with Appendix 1 provides an independent review of these land parcels which has enabled a better understanding of the site’s Green Belt function; see Table 6.1. As a comparison, those land parcels with more significant ratings than then site are highlighted by ZLA as bold italic text:

**Table 6.1: Summary of ZLA’s Assessment of Parcel Contribution to Green Belt Purposes (Green Belt Review) 2021**

Purpose	S46b 503	S46b 510	S46b 512	S46c 218
<u>GB Purpose 1:</u> <i>To check the unrestricted sprawl of large built-up areas</i>	<b><i>Strong Contribution</i></b>	<b><i>Strong Contribution</i></b>	Moderate Contribution	<b><i>Strong Contribution</i></b>
<u>GB Purpose 2:</u> <i>To prevent neighboring towns from merging into one another</i>	<b><i>Strong Contribution</i></b>	<b><i>Moderate Contribution</i></b>	<b><i>Moderate Contribution</i></b>	<b><i>Moderate Contribution</i></b>
<u>GB Purpose 3:</u> <i>To assist in safeguarding the countryside from encroachment</i>	Moderate Contribution	<b><i>Strong Contribution</i></b>	<b><i>Strong Contribution</i></b>	<b><i>Strong Contribution</i></b>
<u>GB Purpose 4:</u> <i>To preserve the setting and special character of historic towns</i>	No Contribution	No Contribution	No Contribution	No Contribution
<u>GB Purpose 5:</u> <i>To assist in urban regeneration by encouraging the recycling of the derelict land</i>	Strong Contribution	Strong Contribution	Strong Contribution	Strong Contribution

6.10. The anticipated harm to the function and integrity of the Green Belt was considered as part of Green Belt Review Part Two, and ZLA’s site specific review found the following; see Table 6.2. As a comparison, those land parcels with a more significant rating than then site are highlighted by ZLA as bold italic text:

**Table 6.2: Summary of ZLA’s Assessment of the Overall Harm From Release of Land from the surrounding Green Belt (Green Review Part Two) 2021**

Purpose	S46b 503	S46b 510	S46b 512	S46c 218
<i>Release of land from the Green Belt</i>	<b><i>Very High Harm</i></b>	<b><i>High Harm</i></b>	<b><i>High Harm</i></b>	<b><i>Very High Harm</i></b>

6.11. In summary, ZLA considers that other land parcels along the eastern edge of Bilbrook have the potential to harm the function and integrity of the Green Belt surrounding Bilbrook. In particular, there is potential for significant impacts to spatial openness, visual openness and to generate ribbon effect and coalescence particularly to the south east of Bilbrook.



## 7. SUMMARY OF COMPARTATIVE ASSESSMENT: BILBROOK AND THE WIDER AREA OF CODSALL

### Introduction

- 7.1. To ensure a thorough comparative assessment, ZLA has also considered land parcels situated in the Green Belt around the wider area of Bilbrook, and the wider area west (beyond Codsall). ZLA has independently appraised land parcels previously promoted (and highlighted within the LPA's published Green Belt Review from 2019). These land parcels are of similar or greater quantum to the site, and are situated predominantly on the western and northern periphery of Codsall.

### Comparative Assessment

- 7.2. The appraised land parcels are situated across a number of land parcels identified by the LPA in their 2019 Green Belt Review, including:
- Site Promotion ref: S53h 224;
  - Site Promotion ref: S51b 230;
  - Site Promotion ref: S51b 630;
  - Site Promotion ref: S41a 217; and
  - Site promotion ref: S41a 222.
- 7.3. In line with our review of the site, ZLA has undertaken a four stage appraisal of these sites as a comparative assessment; see Appendix 2 of this Green Belt Technical Note.
- 7.4. For continuity the appraisal of these land parcels have been undertaken in line with the published methodology within the LPA's South Staffordshire Green Belt Review (Part One and Two), 2019. A summary of ZLA's Green Belt assessment for these land parcels is included below.

### Summary of Comparative Assessment to the wider area of Codsall

- 7.5. The appraisal contained with Appendix 2 provides an independent review of these land parcels which has enabled a better understanding of the site's Green Belt function; see Table 7.1 overleaf. As a comparison, those land parcels with more significant ratings than the site are highlighted by ZLA as bold italic text:



Table 7.1: Summary of ZLA’s Assessment of Parcel Contribution to Green Belt Purposes (Green Belt Review) 2021

Purpose	S53h 224	S51b 230	S51b 630	S41a 217	S41a 222
<u>GB Purpose 1:</u> To check the unrestricted sprawl of large built-up areas	Moderate Contribution	<b>Strong Contribution</b>	<b>Strong Contribution</b>	<b>Strong Contribution</b>	<b>Strong Contribution</b>
<u>GB Purpose 2:</u> To prevent neighboring towns from merging into one another	No Contribution	<b>Moderate Contribution</b>	<b>Moderate Contribution</b>	<b>Moderate Contribution</b>	<b>Moderate Contribution</b>
<u>GB Purpose 3:</u> To assist in safeguarding the countryside from encroachment	Moderate Contribution	<b>Strong Contribution</b>	<b>Strong Contribution</b>	<b>Strong Contribution</b>	<b>Strong Contribution</b>
<u>GB Purpose 4:</u> To preserve the setting and special character of historic towns	No Contribution	No Contribution	No Contribution	No Contribution	No Contribution
<u>GB Purpose 5:</u> To assist in urban regeneration by encouraging the recycling of the derelict land	Strong Contribution	Strong Contribution	Strong Contribution	Strong Contribution	Strong Contribution

7.6. The anticipated harm to the function and integrity of the Green Belt was considered as part of Green Belt Review Part Two, and ZLA’s site specific review found the following; see Table 7.2. As a comparison, those land parcels with a more significant rating than then site are highlighted by ZLA as bold italic text:

Table 7.2: Summary of ZLA’s Assessment of the Overall Harm From Release of Land from the surrounding Green Belt (Green Review Part Two) 2021

Purpose	S53h 224	S51b 230	S51b 630	S41a 217	S41a 222
Release of land from the Green Belt	<b>Moderate to High Harm</b>	<b>High Harm</b>	<b>High Harm</b>	<b>Very High Harm</b>	<b>High Harm</b>

7.7. In summary, ZLA considers that other land parcels along the eastern edge of Bilbrook have the potential to harm the function and integrity of the Green Belt surrounding Bilbrook. In particular, there is potential for significant impacts to spatial openness, visual openness and to generate ribbon effect and coalescence particularly to the south east of Bilbrook.



## 8. CONCLUSION

- 8.1. Zebra Landscape Architects ('ZLA') has been commissioned by Barratt West Midlands (the 'Promotor') to prepare Green Belt Position Note. This document appraises the Green Belt function of land west of Barnhurst Lane, Bilbrook, South Staffordshire (the 'site'), and also includes a comparative assessment of further land parcels surrounding the settlement.
- 8.2. This Position Paper facilitate an independent technical evidence base for ongoing discussion for the site's promotion through the Local Plan process. The assessment was informed by a desk-based review of available data, policy, landscape character publications and mapping. A site visit was undertaken by an experienced Chartered Landscape Architect in July 2021.
- 8.3. The site is approximately 8 Hectares, and is entirely situated within the West Midlands Green Belt. The Promotor is promoting this land parcel for new residential development through the Local Planning process, and this document informs their understanding and discussions around opportunities and constraints.
- 8.4. The Local Planning Authority undertook a Green Belt Review of land within its administrative authority. The review was published in July 2019 and was entitled the 'South Staffordshire Green Belt Study Stage 1 and 2 Report'.
- 8.5. This review was undertaken independently by an expert third party, who were appointed in 2018 to 'undertake an assessment of the Green Belt for the City of Wolverhampton, Dudley, Sandwell and Walsall, (together comprising the Black Country) and South Staffordshire.' The study provides an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan) and the strategic site allocations and individual development plans of the Black Country Authorities and South Staffordshire.
- 8.6. This appraisal has been completed in line with the methodology published by the LPA's Green Belt Review (Part One and Two 2019 respectively). This utility of this methodology ensures a robust approach has been taken that is consistent with that of the LPA's own Green Belt Review, and provide evidence of the suitability of the site for sustainable development in this regard and its release from the Green Belt.
- 8.7. Given the foregoing, ZLA finds that the site affords less of a contribution to the Green Belt than the wider land parcel of S46 (appraised in Part One of the LPA's Green Belt Review, 2019), and also S46b and S46c within Part Two of their Review; see Section 5 above.

### **Findings of ZLA's Site Specific Assessment**

- 8.8. ZLA considers the parcel S46 is too large an assessment parcel to accurately assess the sites under consideration. It is unable to reflect the varying land uses as well and robust physical boundaries and features which area situated on the eastern edge of Codsall (which neighbour and enclose this site), as well as the varying levels of 'countryside' character, intactness of landscape character or intervisibility across the wider area.
- 8.9. In particular through sub-dividing this land parcel (S46), the Local Planning Authority's Green Belt review does not recognise that certain sections of the appraised Green belt are more isolated and detached from Bilbrook.





- 8.10. In these situations, the land parcel is removed from the settlement edge through the combination of physical feature and robust boundaries which could be utilised for re-aligning Green Belt boundaries. This is further heightened by an inconsistent Green Belt boundary. These situations are commonly seen around the north and north eastern edge of land tract S46, and further noted within the comparative assessment for land parcels to the north of Bilbrook and west beyond Codsall; see Section 7 and Appendix 2.
- 8.11. Again, this is an example of the parcel being insufficiently fine grain to make an accurate assessment, and instead rely on a broad-brush appraisal and ‘averaging’ of characteristics
- 8.12. However, from a landscape character, perceptual and visual perspective, and as informed by this site specific appraisal, the following key points in respect of their Green Belt function and the anticipated harm to the integrity of the Green Belt can be made. A summary of ZLA’s Green Belt assessment for these land parcels is included below:
- The site is situated inside, and sandwiched between, main vehicle routes to the east of Bilbrook including the Pendeford Mill Lane and Barnhurst Lane which robustly enclose the settlement. These physical features are robust, durable and long-established;
  - The site is further enclosed by robust woodland, tree groups and the River Penk, which create substantial durable features, which are also long-standing;
  - Wider open countryside is situated beyond durable physical features which enclose the fields limiting intervisibility and connectivity. The site has a stronger relationship with Bilbrook;
  - The long-standing settlement edge and residential curtilages of Bilbrook are discernible from within the site’s interior. There are direct and obvious views towards the recently completed and still being built out residential dwellings north west of the site (south of Pendeford Mill Lane); and
  - Land adjoining the site’s northern and western edge is intended to be developed for new residential development providing over 800 homes between the site and Bilbrook within currently open agricultural fields. Implementation of this allocated site would alter the sensory and perceptual qualities of the intervening Green Belt. Consequently, the combination of development south of Pendeford Mill and SA 1, development with which would afford the site a spatial equivalence;
  - The site does not contribute to the setting or special character of a historic town.
- 8.13. Through the undertaking of this site-specific appraisal, ZLA finds that whilst the removal of the site from the Green Belt, and its eventual development, the effects on the openness of the wider Green Belt surrounding Bilbrook would be benign rather harmful. The logical development of the site would be contained by durable and defensible features eliminating perceived or physical coalescence with outlying settlement or ribbon development along existing vehicle routes.

#### **Findings from ZLA’s Comparative Assessment**

- 8.14. ZLA reviewed a further ten land parcels situated around Bilbrook, and also Codsall to the south and west. These land parcels were of similar or greater quantum to that of the site, and have been previously promoted for residential development as part of the previous Call for Site conducted by the Local Planning Authority.



- 8.15. This assessment provides interesting reading in respect of other land parcels which are being promoted for new residential development necessitating the release of the land from the Green Belt. From a landscape character, perceptual and visual perspective, and as informed by the appraisal thus far completed in this report, the following key points in respect of their Green Belt function and the anticipated harm to the integrity of the Green Belt can be made as follows:

Summary of Comparative Assessment to the eastern edge of Codsall:

- Site Promotion ref: S46b 503: The release of this land parcel is less favourable than the site. The release of the land for development would lead to urban sprawl and contiguous link (perceived and physical) between Bilbrook and Pendeford which would have an adverse effect on the integrity of the adjacent Green Belt. The existing gap between Bilbrook and Pendeford would be substantially eroded, and the settlements would coalesce within through ribbon development.
  - Site Promotion ref: S46b 510: The release of this land parcel is less favourable than the site. The release of the land for development would extend urban built form and urban features outwards into open countryside. This would lead to ribbon development (perceptually and physically) along Codsall Road and would significantly impact openness and would adversely impact the Green Belt through the introduction of new built form and urban features. This would weaken the function of the adjacent Green Belt.
  - Site Promotion ref: S46b 512: The release of this land parcel is less favourable than the site. The release of the site from the Green Belt would have the potential for High Harm through the extension of development into the interlying gap between the southern edge of Codsall (Birches Bridge) and Wergs (perceptually and physically) and would substantially reduce the spatial openness of this Green Belt area.
  - Site Promotion ref: S46c 218: The release of this land parcel is less favourable than the site. This land parcel makes strong contribution to multiple Green Belt purposes and its release for development would impact the openness of the countryside surrounding the north east of Bilbrook and the northern edge of Codsall. The release of this land for development would introduce new built form and urban features isolated from Bilbrook in an outlying location, thus reducing the spatial openness and visual openness of the Green Belt. This would weaken the function and integrity of the Green Belt.
- 8.16. The land parcel formerly promoted to the Local Planning Authority (ref: 519) is the land within the SA 1 - Strategic development location: Land East of Bilbrook. Accordingly, this land parcel has not been appraised.
- 8.17. In summary, ZLA considers the majority of land parcels reviewed to the north eastern and eastern periphery of Bilbrook are less favourable than the site for Green belt release. Given our site specific appraisal, the site is a good candidate for Green release, especially, when considered in combination with the allocated site SA 1 - Strategic development location: Land East of Bilbrook.

Comparative Assessment to wider area of Bilbrook and surrounding Codsall:

- Site Promotion ref: S53h 224: The release of this land parcel is less favourable than the site. Green Belt release would weaken the function and integrity of the Green Belt as it would extend development beyond the existing settlement edge of Codsall which is currently continuous along the western edge. New development would project outwards beyond the settlement of Codsall and reduce the spatial openness and visual openness of the Green Belt.



- Site Promotion ref: S51b 230: The release of this land parcel is less favourable than the site. New development would project outwards beyond the settlement of Codsall and reduce the spatial openness and visual openness of the Green Belt. Extending development beyond the existing settlement edge of Codsall would exaggerate ribbon type development already occurring along Moatbrook Lane.
  - Site Promotion ref: S51b 630: The release of this land parcel is less favourable than the site. Development would extend beyond the perceived built limits of Codsall and is less enclosed to its eastern edge leading to impacts on spatial openness and visual openness. If implemented, development would be experienced as isolated and incongruous, detached from the extent settlement.
  - Site Promotion ref: S41a 217: The release of this land parcel is less favourable than the site. This land parcel makes strong contribution to multiple Green Belt purposes and its release for development would impact the openness of the countryside surrounding the settlement of Bilbrook introducing new built form and urban features isolated from the settlement in an outlying location. The development of this land would substantial impact spatial openness and visual openness, and weaken the function of the Green Belt.
  - Site promotion ref: S41a 222: The release of this land parcel is less favourable than the site. The release of the land parcel would significantly impact openness and would adversely impact the Green Belt through the introduction of built form and urban features on land that is elevated at the existing settlement edge of Bilbrook and the northern edge of Codsall. The development of this land would substantial impact spatial openness and visual openness, and weaken the function of the Green Belt.
- 8.18. In summary, ZLA considers land parcels with in the wider area of Bilbrook to be less favourable for Green Belt removal, and would potentially lead to more significant impact on the openness of the Green belt surrounding Bilbrook (and the wider area of Codsall). In some of these situations, the release of this land would incongruously extend urban development into open countryside beyond contiguous settlement edge, or would lead to infill and coalescence and ribbon development which would substantially harm the spatial openness and visual openness of the Green Belt.
- 8.19. In conclusion, ZLA considers that the site is a strong candidate for Green Belt release to facilitate future residential development.
- 8.20. There is direct intervisibility of the existing urban features and built within the site as the discernibility of these features extend through the site, but limited by the existing tree groups and robust woodland block to the east and south. This weakens the integrity of the adjacent Green Belt within which the site is situated as the existing urban edge is experienced as raw and incongruous at its closest location.
- 8.21. The release of the site from the Green Belt would afford an opportunity for a consistent boundary treatment of Bilbrook and would contain development within long-established robust physical features of roadways, canal route, the River Penk, extensive tree groups and woodland blocks. This would not weaken the integrity of the adjacent Green Belt and would not compromise the openness of the wider Green Belt through development and urban features which might otherwise be readily discernible and incongruous.
- 8.22. Further to this, given our comparative assessment, the release of land parcel S46c 519 (which neighbours the site) from the Green Belt, then the combination of the two land parcels would represent the most appropriate and less harmful land which to accommodate the future growth of Codsall.
- 8.23. Might future growth be accommodated to the eastern edge of Bilbrook within the strong defensible durable boundaries of Pendeford Mill Lane, Barnhurst Lane and the Staffordshire Worcestershire canal,



then the realigned of the Green Belt would be sustainable through these durable and permanent boundaries, and perception and physical growth mitigated through expansive and contiguous tree cover and woodland associated with Barnhurst Lane, the canal and the River Penk, which are long-standing and well established features.

- 8.24. From undertaking this site specific, and comparative assessment of further individual sites around Bilbrook (and the wider area of Codsall), ZLA considers the site would be a strong candidate for Green Belt release. In combination with the SA1 - Land East of Bilbrook strategic development, the site would lead to limited impact on spatial openness and visual openness.



## APPENDIX ONE: COMPARATIVE ASSESSMENT EASTERN EDGE OF CODSALL



**S46b Site Promotion ref: 503**

Image A1.1: Extract from South Staffordshire Green Belt Review 2019, Part Two, Appendix 3, page 553. N.B. The approximate location and quantum of S46b Site Promotion ref: 503 is illustrated by the Local Planning Authority. The approximate location of the site is indicated by ZLA with a solid red line

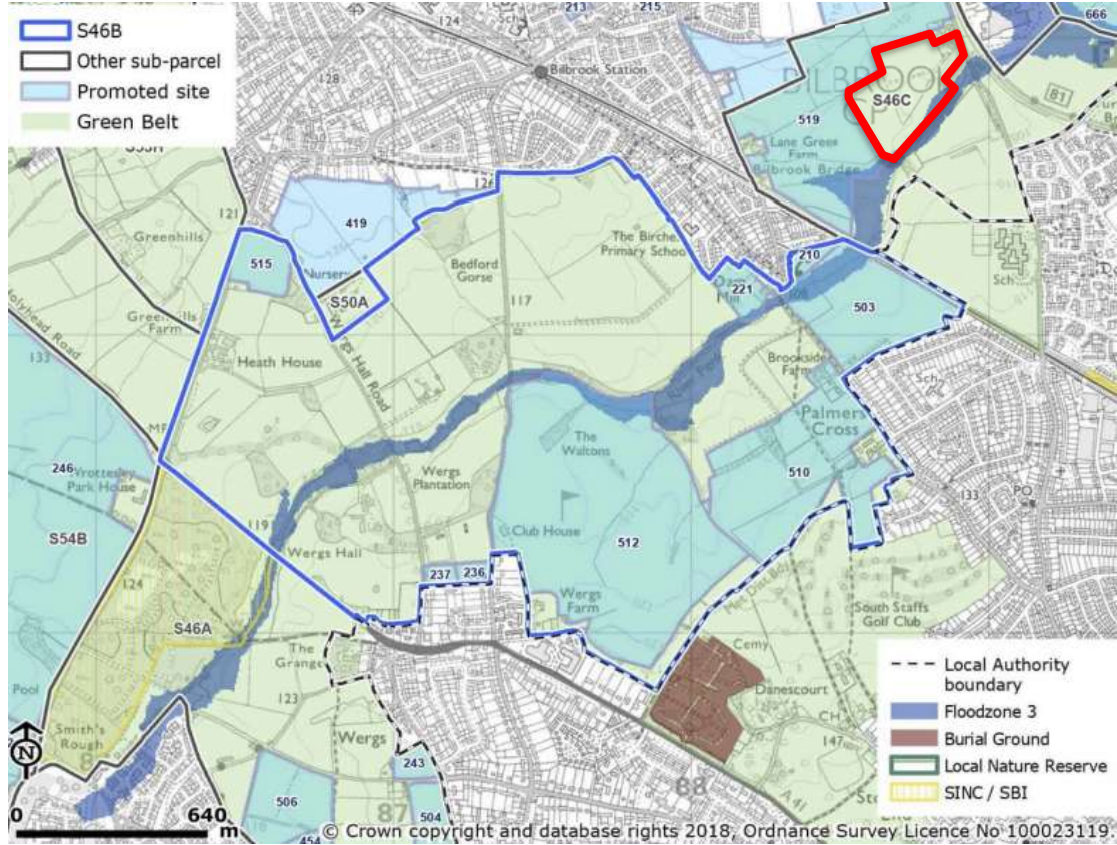


Table A1.1: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for the site area for S46b Site Promotion ref: 503	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas</i></p>	<p><i>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</i></p>	
	<p>This land parcel is situated between the south eastern edge of Bilbrook and the north western edge of Pendeford. The land parcel constitute the majority of the open undeveloped land between these two settlements. Its release from the Green Belt for development would merge the two settlements leading to coalescence.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 2: To prevent neighboring towns from merging into one another</i></p>	<p><i>Does the parcel lie directly between two settlements and form all or part of a gap between them?</i></p>	
	<p>The site is situated between two distinct settlements. The land parcel acts as a buffer between Bilbrook and Pendeford.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment</i></p>	<p><i>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</i></p>	
	<p>To the north the land parcel is enclosed by a railway line (and school grounds beyond), existing residential dwellings and urban features to the east, robust hedgerows to the south and extensive tree groups along the River Penk to the west. These features reduce the interconnectivity and intervisibility with the wider open countryside, which is predominantly to the north (beyond the River Penk) and the south.</p> <p>The land parcel contains elements of the wider open countryside with its field pattern and size, robust field hedgerows, tree groups along the course of the River Penk and landform which are typical of the host landscape character area. However, there are direct and obvious views towards the existing residential dwellings to the eastern edge.</p>	<p>Moderate Contribution</p>





<i>GB Purpose 4:          To preserve the setting and special character of historic towns</i>	What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?	
	The site does not contribute to the setting or special character of a historic town.	No Contribution
<i>GB Purpose 5:          To assist in urban regeneration by encouraging the recycling of the derelict land</i>	Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?	
	The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.	Strong Contribution
Overall Contribution:	ZLA finds that notwithstanding Green Belt purpose 5, the site performs a strong role in terms of Green Belt in terms of resisting urban sprawl of the two neighboring settlements, as well the encroachment of urban built form within open countryside.	Strong Contribution





Table A1.2: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt

Criteria	ZLA's Assessment for the site area for S46b Site Promotion ref: 503	Grading
<u>Purpose 1:</u>	<i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i>	
	The release of the land for development would lead to urban sprawl and contiguous link (perceived and physical) between south eastern Bilbrook and Pendeford. There is strong intervisibility of the existing urban features and built form from within the site, as well as the wider open countryside beyond to the north and south. The release of the land parcel would lead to coalescence and would have an adverse effect on the integrity of the adjacent Green Belt.	Very High Harm
<u>Purpose 2:</u>	<i>How strong would the remaining settlement gap be if the Green Belt land were released?</i>	
	Locally, the existing gap between Bilbrook and Pendeford would be substantially eroded, and the settlements would coalesce within through ribbon development.	Very High Harm
<u>Purpose 3:</u>	<i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i>	
	The site is sandwiched within durable physical features which enclose and sever connectivity and reduce intervisibility with the wider open countryside to the north (in part) and south only. To the east and west there is a distinct urban context. The release of the site for development would increase an urban influence between the two settlements.	Very High Harm
Overall Harm:	ZLA finds that the release of the site from the Green Belt would represent Very High Harm to the integrity and function of the wider Green Belt. The expansion of urban features and built form would lead to coalescence along the Codsall Road (perceived and physical) reducing the spatial openness and visual openness of the Green Belt at this location.	Very High Harm



**Table A1.3: ZLA's Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for S46b Site Promotion ref: 503
<i>Visual Openness:</i>	There are open views within and through the land parcel's interior, with intervisibility of residential development to the east. The wider boundaries are relatively enclosed and limited intervisibility with the wider open countryside.
<i>Physical Openness:</i>	The land parcel does not contain built form. The land parcel is extensively enclosed by mature tree groups and robust woodland (and the River Penk).
<i>What is the relationship between the nearest settlement and the surrounding Green Belt?</i>	The land parcel represents the existing gap between Bilbrook and Pendeford. The quantum of the land is the vast majority of open land between the two settlements. The land parcel does not represent the wider context of open countryside as is a pocket of land sandwiched between existing development and long-standing physical features.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	No Public Right of Way passes through the site area.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	The land parcel contains elements of the wider open countryside with its field pattern and size, robust field hedgerows, tree groups along the course of the River Penk and landform which are typical of the host landscape character area.

**Table A1.4: ZLA's Assessment of Boundary resilience**

Evaluation Question	ZLA comments for the site area for S46b Site Promotion ref: 503
<i>Significance and permanence of boundaries:</i>	The site is situated inside, and sandwiched between, man-made physical features include a railway line, local vehicle route and neighboring residential development. There are extensive woodland groups along the River Penk to the west. These features are long standing and permanent and act as the durable edges to the two settlements. Development of this land would significantly reduce the gap between the settlements, which would further enclose views of the wider open countryside and would have a stronger relationship with the urban setting through coalescence.



**S46b Site Promotion ref: 510**

Image A1.2: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 553. N.B. The approximate location and quantum of S46b Site Promotion ref: 510 is illustrated by the Local Planning Authority. The approximate location of the site is indicated by ZLA with a solid red line

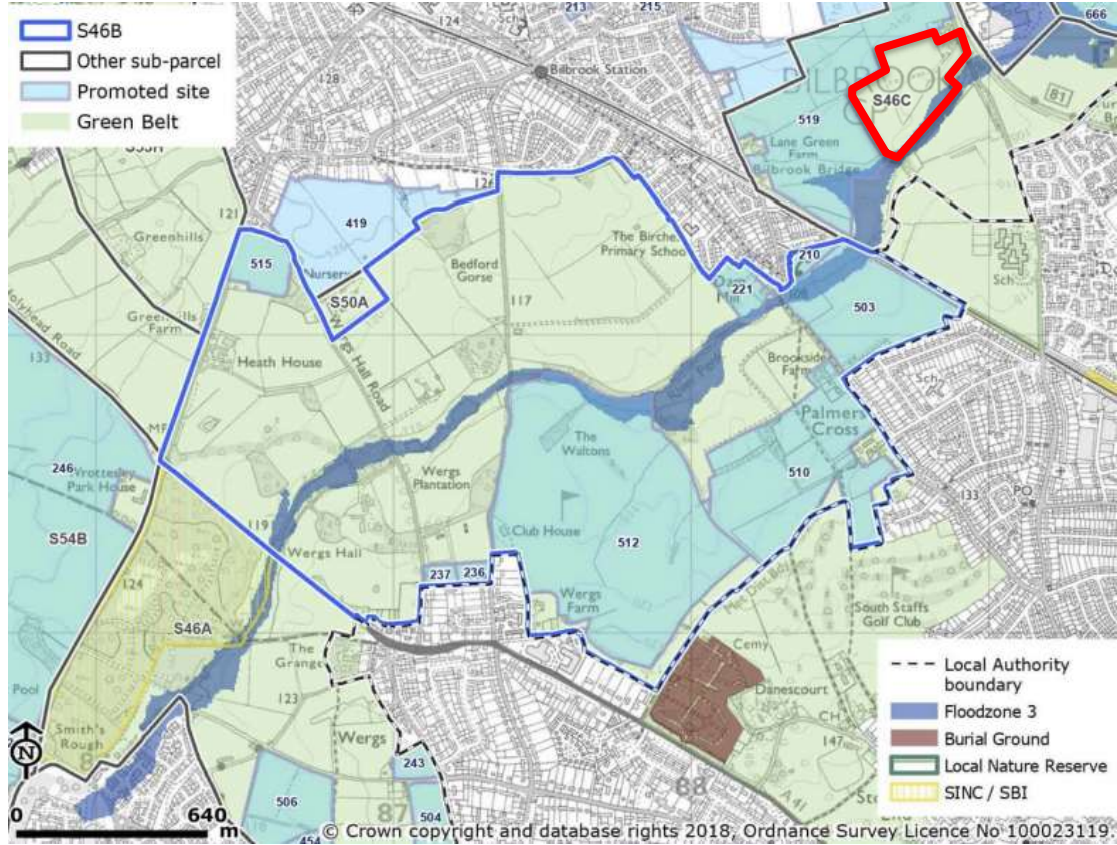


Table A1.5: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for the site area for S46b Site Promotion ref: 510	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas</i></p>	<p>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</p> <p>The land parcel is detached from Bilbrook but adjoins the north western edge of Pendeford. The land is overlooked by existing residential development on Codsall Road and Links Avenue to the east and southern site boundaries. However, there is a strong openness throughout the interior of the land parcel and direct views across the wider open countryside to the north west and towards the neighboring golf course. Within these areas there is limited if any perception of built form or urban features. Consequently, the land parcel has a relatively strong relationship with the open countryside, with which it has a spatial equivalence. The southern and western boundaries are more robust, with small pockets of woodland within the quantum of the land parcel. However, the northern boundary is less defined and more open affording intervisibility with the wider open countryside.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 2: To prevent neighboring towns from merging into one another</i></p>	<p>Does the parcel lie directly between two settlements and form all or part of a gap between them?</p> <p>The site is situated between two distinct settlements. The land parcel acts as a buffer between Bilbrook and Pendeford.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment</i></p>	<p>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</p> <p>Wider open countryside is situated beyond durable physical features which enclose the fields limiting intervisibility and connectivity. The long-standing settlement edge and residential curtilages of Pendeford are discernible from within the site's interior. The land parcel contains the characteristics of open countryside (i.e., the land does not contain existing built form), with a moderately intact landscape character i.e., landform, field pattern and size, field hedgerows and scattered hedgerow trees as well as small woodland copse which are typically found in the host landscape character area. The land parcel has a stronger relationship with the open countryside than the neighboring urban area.</p>	<p>Strong Contribution</p>



<i>GB Purpose 4:          To preserve the setting and special character of historic towns</i>	What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?	
	The site does not contribute to the setting or special character of a historic town.	No Contribution
<i>GB Purpose 5:          To assist in urban regeneration by encouraging the recycling of the derelict land</i>	Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?	
	The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.	Strong Contribution
Overall Harm:	ZLA finds that the land parcel makes a Strong Contribution overall to the function and integrity of the Green Belt. Whilst the site does have a moderate level of enclosure with durable robust features, there is intervisibility with the wider open countryside. Consequently, the land shares a spatial equivalence to this. The development of the land having been released would lead to ribbon development along the Codsall Road from Pendeford reducing the overall gap between Bilbrook and Pendeford.	Strong Contribution



Table A1.6: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt

Criteria	ZLA's Assessment for the site area for S46b Site Promotion ref: 510	Grading
Purpose 1:	<i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i>	
	The release of the land for development would extend urban built form and urban features outwards into open countryside. This would lead to ribbon development (perceptually and physically) along Codsall Road and would significantly impact openness and would adversely impact the Green Belt through the introduction of new built form and urban features. This would weaken the function of the adjacent Green Belt.	High Harm
Purpose 2:	<i>How strong would the remaining settlement gap be if the Green Belt land were released?</i>	
	The release of the land parcel would reduce the gap between settlements with ribbon development extending along Codsall Road outwards into the intervening gap within the Green Belt. This would be harmful to the integrity and function of the Green Belt, and diminish the perception of openness.	High Harm
Purpose 3:	<i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i>	
	The development of the site would represent new discernible urban features and would be discernible from the wider open countryside between the two settlements. These new urban features would be seen in combination with the wider urban edge of Pendeford, and consequently, a reduction of the gap between Pendeford and Bilbrook.	High Harm
Overall Contribution:	ZLA finds that the release of the site from the Green Belt would have the potential for High Harm through the formation of ribbon development along Codsall Road reducing the gap between the two settlements (perceptually and physically). The northern boundaries are limited, and the site is intervisible with the wider open countryside, and consequently, impacting the integrity and function of the Green Belt between Bilbrook and Pendeford.	High Harm



**Table A1.7: ZLA’s Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for S46b Site Promotion ref: 510
<i>Visual Openness:</i>	Overall, ZLA finds that the land parcel is open in its nature with broad views across its quantum of each field. There are views outside of the site to the wider open countryside to north and only limited by small woodland copse within the land’s interior. There are direct and obvious views of the existing settlement at Pendeford. The land parcel is experienced as open with a backdrop of open countryside to the north and urban built form and features to the south.
<i>Physical Openness:</i>	The site does not contain built form, but is neighbored by residential and agricultural buildings. The site is extensively enclosed by hedgerows to the east and west and relatively open to the north.
<i>What is the relationship between the nearest settlement and the surrounding Green Belt?</i>	The surrounding Green Belt creates an extensive area of Green Belt to the north of Pendeford which defines the existing gap between Pendeford and Bilbrook. This gap is limited in distance to circa 0.35km in distance at its narrowest point.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	Public Right of Way (LPA ref: Codsall 32 and Codsall 33) passes through the site area.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	Moderately intact landscape character i.e., landform, field pattern and size, field hedgerows and scattered hedgerow trees as well as small woodland copse which are typically found in the host landscape character area. The land parcel has a stronger relationship with the open countryside than the neighbouring urban area.

**Table A1.8: ZLA’s Assessment of Boundary resilience**

Evaluation Question	ZLA comments for the site area for S46b Site Promotion ref: 510
<i>Significance and permanence of boundaries:</i>	The land parcel is detached from Bilbrook but adjoins the north western edge of Pendeford. The land is overlooked by existing residential development on Codsall Road and Links Avenue to the east and southern site boundaries. However, there is a strong openness throughout the interior of the land parcel and direct views across the wider open countryside to the north. The southern and western boundaries are more robust, with small pockets of woodland within the quantum of the land parcel. However, the northern boundary is less defined and more open affording intervisibility with the wider open countryside. These features are a mixture of manmade. If the Green Belt is realigned to these features, it would be more robust and consistent in creating a distinction between urban and open countryside. However, the release of this land for development would have a detrimental effect on the openness of the Green Belt between the two settlements.





**S46b Site Promotion ref: 512**

Image A1.3: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 553. N.B. The approximate location and quantum of Site Promotion ref: 512 is illustrated by the Local Planning Authority. The approximate location of the site is indicated by ZLA with a solid red line

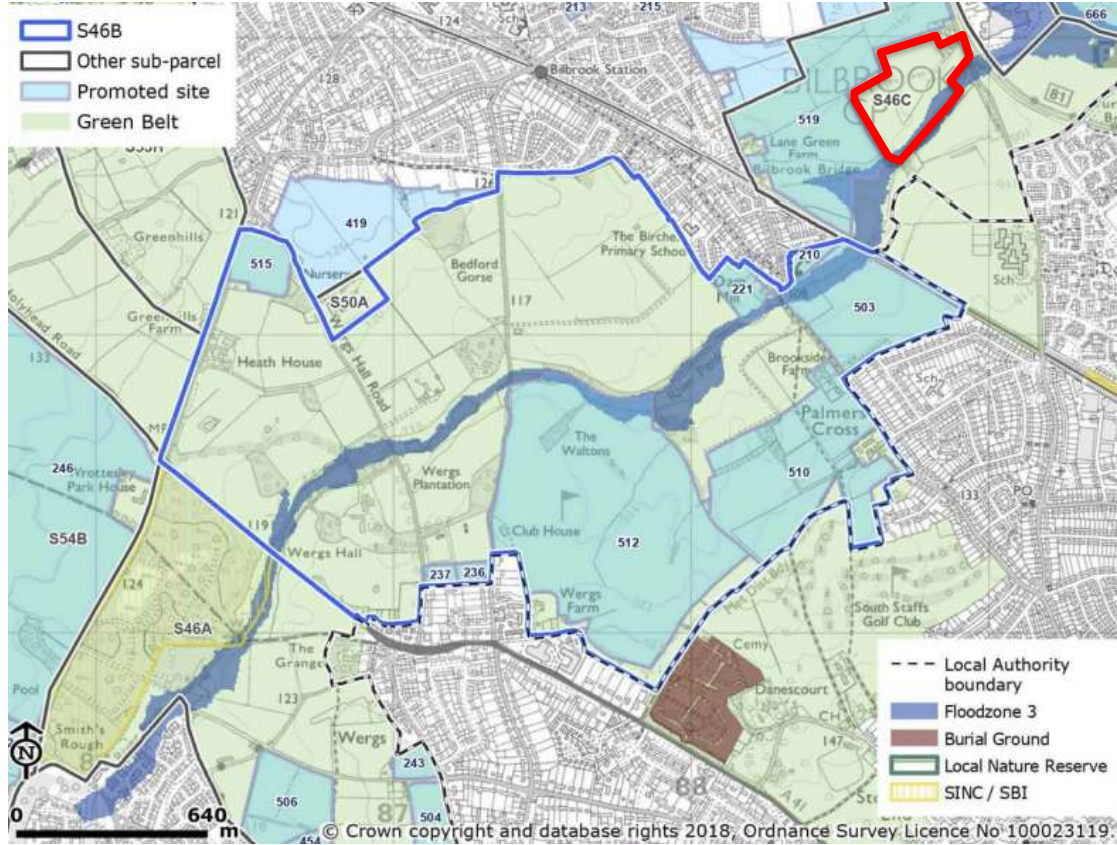




Table A1.9: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for the site area for S46b Site Promotion ref: 512	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas</i></p>	<p>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</p> <p>The land parcel is detached from Bilbrook (and the wider southern edge of Codsall) but adjoins the north edge of Wergs. The land is moderately overlooked by existing residential development on the A41 and Keepers Lane. Openness within the land parcel is limited due to the nature of the land use (Golf course) and extensively planted landscape with mature trees and tree groups. There are urban features and built form at the western edge with the existing club house, officing, storage and car parking. The land parcel has a limited (if any) relationship with the wider open countryside. The north eastern and eastern edge of the land parcel is further limited by modest strips of woodland, beyond which there is open countryside. Currently, this urban edge land use limits the expansion of new settlement from extending into the open countryside between the Bilbook and Wergs.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 2: To prevent neighbouring towns from merging into one another</i></p>	<p>Does the parcel lie directly between two settlements and form all or part of a gap between them?</p> <p>The site is situated between two distinct settlements. The land parcel acts as a buffer between Codsall and Wergs.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment</i></p>	<p>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</p> <p>Wider open countryside is situated beyond durable physical features which are within the land parcel which limiting intervisibility and connectivity with the open countryside. The long-standing settlement edge and residential curtilages of Wergs are in part discernible from within the site's interior. The land parcel does not contain the characteristics of open countryside and has limited (if any) intact landscape character. The land parcel has a stronger relationship with neighbouring urban area.</p>	<p>Strong Contribution</p>



<i>GB Purpose 4:          To preserve the setting and special character of historic towns</i>	What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?	
	The site does not contribute to the setting or special character of a historic town.	No Contribution
<i>GB Purpose 5:          To assist in urban regeneration by encouraging the recycling of the derelict land</i>	Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?	
	The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.	Strong Contribution
Overall Harm:	ZLA finds that the land parcel makes a Moderate to Strong Contribution overall to the function and integrity of the Green Belt. Whilst the site does have a moderate level of enclosure with durable robust features, there is limited intervisibility with the wider open countryside. The development of the land having been released would lead to an expansion of the settlement edge further into the gap between then settlements. However, the existing Golf Course is an urban edge land use rather than that of open countryside. Development will reduce the overall gap between Bilbrook and Wergs.	Strong Contribution



Table A1.10: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt

Criteria	ZLA's Assessment for the site area for S46b Site Promotion ref: 512	Grading
Purpose 1:	<i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i>	
	The release of the land for development would extend urban built form and urban features outwards into open countryside. This would significantly impact openness and would adversely impact the Green Belt through the introduction of new built form and urban features. This would weaken the function of the adjacent Green Belt.	High Harm
Purpose 2:	<i>How strong would the remaining settlement gap be if the Green Belt land were released?</i>	
	The release of the land parcel would reduce the gap between settlements. The remaining land is open countryside managed for agriculture, where there are extensive sections of existing hedgerows degraded, gappy and outgrown or actually missing or removed due to farming practices. The development of the land parcel would impact the openness and the robustness of this gap, which has few robust durable features by which to realign the Green Belt. Overall, development would extend urban influences further northwards which would be harmful on the integrity and function of the Green Belt, and diminish the perception of openness.	High Harm
Purpose 3:	<i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i>	
	The development of the site would represent new discernible urban features and would be discernible from the wider open countryside between the two settlements. These new urban features would be seen in combination with the wider urban edge of Wergs, and consequently, a reduction of the gap between the two would be readily seen.	High Harm
Overall Contribution:	ZLA finds that the release of the site from the Green Belt would have the potential for High Harm through the extension of development into the interlying gap between Codsall and Wergs (perceptually and physically).	High Harm



**Table A1.11: ZLA’s Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for S46b Site Promotion ref: 512
<i>Visual Openness:</i>	Views through the land parcel are limited due to extensive tree components, the northeastern and eastern edges are limited by narrow woodland blocks. Views are relatively contained with limited intervisibility with the wider open countryside. There is moderate visual openness.
<i>Physical Openness:</i>	The site does contain limited built form and is neighbored by existing residential development to the south and west. The site is extensively enclosed by tree and tree groups. There is moderate physical openness.
<i>What is the relationship between the nearest settlement and the surrounding Green Belt?</i>	The surrounding Green Belt creates an extensive area of Green Belt to the north of Wergs which defines the existing gap between Wergs and Billbrook. This gap is limited in distance to circa 1.15 km in distance at its narrowest point.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	There are no Public Right of Way within, or adjoining, the quantum of the land parcel. Access is permissive only to Golf Club members.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	There are urban features and built form at the western edge with the existing club house, officing, storage and car parking. The land parcel has a limited (if any) relationship with the wider open countryside, and a limited (if any) typical features of the host landscape character area.

**Table A1.12: ZLA’s Assessment of Boundary resilience**

Evaluation Question	ZLA comments for the site area for S46b Site Promotion ref: 512
<i>Significance and permanence of boundaries:</i>	Physical features to the north and east are vegetated and long standing There is a local minor vehicle route to the west with existing residential built form partially along the land parcel’s boundary, and enclosed further by residential built form to the southern boundary. These are permanent and long-standing features.



**S46c Site Promotion ref: 218**

Image A1.4: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 557. N.B. The approximate location and quantum of S46c Site Promotion ref: 218 is illustrated by the Local Planning Authority. The approximate location of the site is indicated by ZLA with a solid red line

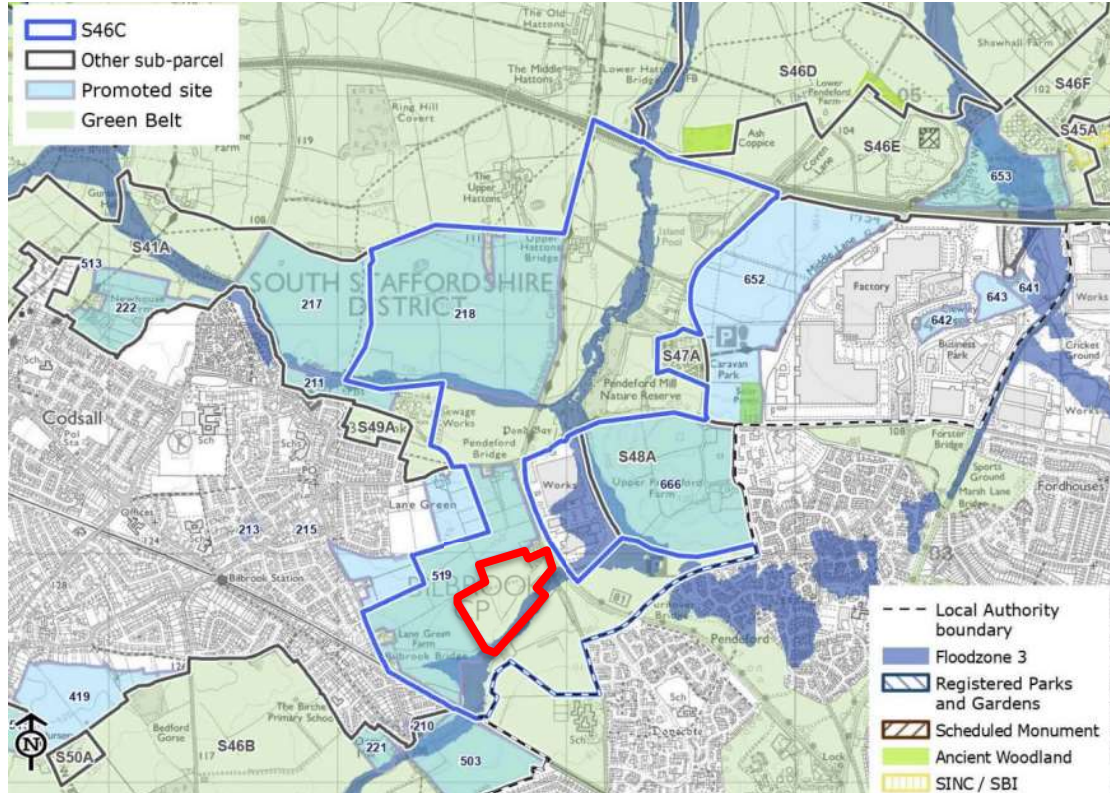


Table A1.13: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for Promoted Site ref: 218	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas.</i></p>	<p><i>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</i></p> <p>This land parcel is situated outside of the perceived settlement edge of Bilbrook, and the neighboring area of Codsall to the west. The land parcel is north of the River Penk and extensive tree groups and field hedgerows. The land parcel is detached from Bilbrook and the residential curtilages of existing built form on rising landform. The northern, eastern and western site area is relatively open with only outgrown hedgerows and scattered trees to the west. A narrow local vehicle route is to the north and an open field edge along the eastern boundary with the Staffordshire Worcestershire Canal. Development would be experienced as detached from the existing settlement and outside of the town's-built limits. The site does not contain built form or is it influenced by urban features retaining a strong relationship with the wider open countryside with which it has a spatial equivalence to the wider setting.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 2: To prevent neighbouring towns from merging into one another.</i></p>	<p><i>Does the parcel lie directly between two settlements and form all or part of a gap between them?</i></p> <p>Whilst the land area plays no significant role in the distance between Codsall and Albrighton, development of the land would be seen as an isolated settlement outlying to Codsall and would impact the distinction of Codsall.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment.</i></p>	<p><i>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</i></p> <p>The land parcel contains the characteristics of the open countryside in terms of field pattern and scale, robust native hedgerows with scattered trees and extensive tree groups along brooks which pass through arable fields (typical of the host landscape character area). The southern boundary to the land parcel is sufficiently robust to significantly filter if not screen direct views of Codsall with only a limited perception of development on the northern edge of the town.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 4: To preserve the setting and special character of historic towns.</i></p>	<p><i>What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?</i></p> <p>The site does not contribute to the setting or special character of a historic town.</p>	<p>No Contribution</p>



<i>GB Purpose 5:          To assist in urban regeneration by encouraging the recycling of the derelict land</i>	<i>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?</i>	
	The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.	Strong Contribution
Overall Contribution:	The land parcel plays an important role in preventing urban sprawl and encroachment in to the open countryside. The release of this land would significantly alter the existing settlement pattern.	Strong Contribution

**Table A1.14: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt**

Criteria	ZLA's Assessment for Promoted Site ref: 218	Grading
<i>Purpose 1:</i>	<i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i>	
	The release of the land parcel would significantly impact openness and would adversely impact the Green Belt through the introduction of built form and urban features in isolation outside and detached from the settlement of Bilbrook and the northern edge of Codsall (to the west of the land parcel). This would weaken the function of the adjacent Green Belt.	Very High
<i>Purpose 2:</i>	<i>How strong would the remaining settlement gap be if the Green Belt land were released?</i>	
	The release of the land parcel would create a detached settlement outlying to Codsall. This would weaken the function of the adjacent Green Belt.	Very High
<i>Purpose 3:</i>	<i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i>	
	The release of the land parcel would introduce new built form and urban features into open countryside which creates the setting for Bilbrook impacting the openness physically and perceptually of countryside.	Very High
Overall Harm:	This land parcel makes strong contribution to multiple Green Belt purposes and its release for development would impact the openness of the countryside surrounding the settlement of Billbrook introducing new built form and urban features isolated from Bilbrook and the wider area of Codsall (to the west) in an outlying location. This would weaken the function of the Green Belt.	Very High





**Table A1.15: ZLA’s Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for Promoted Site ref: 218
<i>Visual Openness:</i>	Long range views across broad, open countryside discernible. There is limited intervisibility with the settlement of Bilbrook. The land parcel has a stronger relationship with open countryside than the urban settlement.
<i>Physical Openness:</i>	This site area does not contain development or urban features and there is limited intervisibility with Bilbrook. The seen is experienced as open with in the wider setting of open countryside surrounding Codsall.
<i>What is the relationship between the settlement and the surrounding Green Belt?</i>	The open countryside forms the setting for the northern edge of Codsall within which the Staffordshire Worcestershire Canal passes through. The land parcel is detached from the settlement and would potentially impact the setting of Bilbrook and the northern edge of Codsall.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	A Public Right of Way passes through the western edge of the land parcel, and there is a Long Distance Walking Route passing along the Staffordshire Worcestershire Canal neighbouring the eastern edge of the land. The land is seen from this public access routes.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No. However, the land parcel is situated in open countryside north of the settlement within which there is a strong sense of open countryside and limited built form. This land would have a high sensitivity and susceptibility to change in landscape and visual terms.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	Moderately intact field pattern and size with typical field hedgerows and scattered hedgerow trees. Arable farming is common.

**Table A1.16: ZLA’s Assessment of Boundary resilience**

Evaluation Question	ZLA comments for the site area for Promoted Site ref: 218
<i>Significance and permanence of boundaries:</i>	The land parcel is relatively naked and open to its eastern and western edges whereby there is strong intervisibility with the wider open countryside. Physical features to the north and east are manmade and long standing (local minor vehicle route and also Staffordshire Worcestershire Canal). In combination, these physical features do not robustly enclose the site and there is intervisibility and connectivity with the wider open countryside. It is anticipated, might this land parcel be released, it would require the establishment of significant landscape buffers to ensure the integrity of the wider Green Belt.





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## APPENDIX TWO: COMPARATIVE ASSESSMENT FOR BILBROOK AND THE WIDER AREA OF CODSALL



S53h\_224

Image A2.1: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 629. N.B. The approximate location and quantum of S53h Site Promotion ref: 224 is illustrated by the Local Planning Authority. The site is situated east of Codsall and not illustrated on the below image



Table A2.1: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for S53h Site Promotion ref: 224	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas</i></p>	<p><i>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</i></p>	
	<p>The land parcel is situated neighboring the western settlement edge of Codsall. The land parcel is enclosed to its northern, southern and western boundary by long-standing well established physical features including woodland, extensive hedgerows and active railway line. Station Road and Oaken Drive run along the eastern and southern edge to the land parcel. These physical features limit connectivity and intervisibility with open countryside and the land parcel has a stronger relationship to the urban area than the wider countryside. The quantum of the land includes a small number of existing equestrian buildings to the north east. There are also direct and obvious intervisibility with the wider urban building and features. The site is enclosed a combination of physical features which are extensive and long standing creating a durable edge. The site is situated sandwiched within these physical features and contained by these urban features with intervisibility with the surrounding urban environment.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 2: To prevent neighbouring towns from merging into one another</i></p>	<p><i>Does the parcel lie directly between two settlements and form all or part of a gap between them?</i></p>	
	<p>The site plays no role due to the distance between the West Midlands Conurbation and Albrighton, its nearest outlying town.</p>	<p>No Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment</i></p>	<p><i>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</i></p>	
	<p>Land contains the characteristics of open countryside (i.e., an absence of built or otherwise urbanising uses in Green Belt terms) but does not have a stronger relationship with the urban area than with the wider countryside due to the extensive enclosure of the land parcel with views prominently of the wider urban setting.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 4: To preserve the setting and special character of historic towns</i></p>	<p><i>What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?</i></p>	
	<p>The site does not contribute to the setting or special character of a historic town.</p>	<p>No Contribution</p>



<p><i>GB Purpose 5: To assist in urban regeneration by encouraging the recycling of the derelict land</i></p>	<p>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?</p>	
	<p>The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.</p>	<p>Strong Contribution</p>
<p>Overall Contribution:</p>	<p>Notwithstanding Green Belt purpose 5, ZLA finds that the site performs a limited role in terms of Green Belt function of less than Moderate overall. The site is sandwiched within durable physical features which enclose and sever connectivity and intervisibility with the wider open countryside. There are direct and obvious views of the existing settlement of Codsall with urban built form and features neighbouring the site.</p>	<p>Moderate Contribution</p>

**Table A2.2: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt**

Criteria	ZLA's Assessment for S53h Site Promotion ref: 224	Grading
<p><i>Purpose 1:</i></p>	<p><i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i></p>	
	<p>Green Belt release would weaken the function and integrity of the Green Belt as it would extend development beyond the existing settlement edge of Codsall which is currently continuous along the western edge. This would weaken the integrity and function of the surrounding Green Belt.</p>	<p>Moderate to High Harm</p>
<p><i>Purpose 2:</i></p>	<p><i>How strong would the remaining settlement gap be if the Green Belt land were released?</i></p>	
	<p>The land parcel plays no role due to the distance between the West Midlands Conurbation and Albrighton, its nearest neighbouring town. Through the release of the site from the Green Belt the situation would remain unchanged.</p>	<p>Low Harm</p>
<p><i>Purpose 3:</i></p>	<p><i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i></p>	
	<p>The land parcel is sandwiched within durable physical features which enclose and sever connectivity and intervisibility with the wider open countryside. However, this new development would project outwards beyond the settlement and reduce the perception of openness.</p>	<p>Moderate to High Harm</p>
<p>Overall Harm:</p>	<p>New development would project outwards beyond the settlement and reduce the perception of openness and weaken the integrity of the adjacent Green Belt.</p>	<p>Moderate to High Harm</p>



**Table A2.3: ZLA’s Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for S53h Site Promotion ref: 224
<i>Visual Openness:</i>	The land parcel contains a small level of existing equestrian built and extensively enclosed by mature tree groups and robust woodland. This reduces the openness of the land, which is experienced as enclosed.
<i>Physical Openness:</i>	The land parcel contains a small level of existing equestrian built and extensively enclosed by mature tree groups and robust woodland. This reduces the openness of the land, which is experienced as enclosed.
<i>What is the relationship between the nearest settlement and the surrounding Green Belt?</i>	The surrounding Green Belt creates an extensive area of Green Belt to the west of Codsall which is contiguous outside of the settlement boundary.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	No Public Right of Way passes through the site area.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	Limited intactness. There are significant elements of degraded and missing field hedgerows and limited scattered hedgerow trees (typical feature of the host landscape character area).

**Table A2.4: ZLA’s Assessment of boundary resilience**

Evaluation Question	ZLA comments for S53h Site Promotion ref: 224
<i>Significance and permanence of boundaries:</i>	The land parcel is situated with extensively vegetated boundaries and the neighboring railway line. These features are a mixture of manmade and natural and also include nearby vehicle routes which also define the urban to Green Belt transition area on the west of Codsall. Green Belt is contiguous along Oaken Lane, and if the Green Belt is re-aligned to these features, it would not be more robust. Any small-scale realignment for ‘infill’ like development would be inconsistent with the current Green Belt edge weakening the integrity of the adjacent Green Belt.



## S51b\_230 and 630

Image A2.1: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 597. N.B. The approximate location and quantum of S51b Site Promotion ref: 230 and 630 is illustrated by the Local Planning Authority. The site is situated east of Codsall and not illustrated on the below image

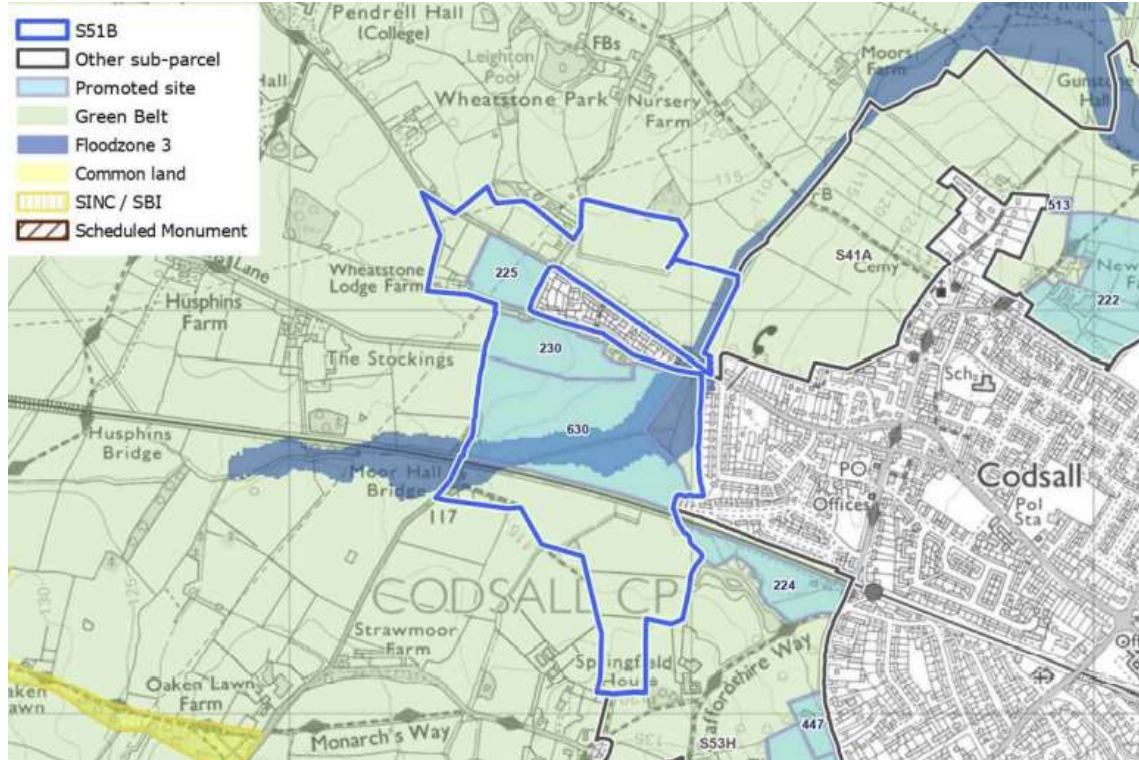




Table A2.5: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for S51b Site Promotion ref: 230 and 630	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas</i></p>	<p><i>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</i></p>	<p>Strong Contribution</p>
<p><i>GB Purpose 2: To prevent neighbouring towns from merging into one another</i></p>	<p><i>Does the parcel lie directly between two settlements and form all or part of a gap between them?</i></p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment</i></p>	<p><i>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</i></p>	<p>Strong Contribution</p>
<p><i>GB Purpose 4: To preserve the setting and special character of historic towns</i></p>	<p><i>What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?</i></p>	<p>No Contribution</p>
<p><i>GB Purpose 5: To assist in urban regeneration by encouraging the recycling of the derelict land</i></p>	<p><i>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?</i></p>	<p>Strong Contribution</p>
<p>Overall Contribution:</p>	<p>Both land parcels are isolated and situated within open countryside. Overall, ZLA considers that both land parcels make a Strong Contribution to the function of the Green belt.</p>	<p>Strong Contribution</p>



Table A2.6: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt

Criteria	ZLA's Assessment for S51b Site Promotion ref: 230 and 630	Grading
Purpose 1:	<i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i>	
	Green Belt release would weaken the function and integrity of the Green Belt as it would extend development beyond the existing settlement edge of Codsall exaggerating the ribbon type development already occurring along Moatbrook Lane. This is particularly the case for Site Promotion ref: 230. This would weaken the integrity and function of the surrounding Green Belt.	High Harm
Purpose 2:	<i>How strong would the remaining settlement gap be if the Green Belt land were released?</i>	
	The land parcels play no role due to the distance between the West Midlands Conurbation and Albrighton, its nearest neighbouring town. Through the release of the site from the Green Belt the situation would remain unchanged. However, locally the development would extend beyond the perceived built limits of Codsall and is less enclosed to its eastern edge. This is particularly the case for Site Promotion ref: 630 which if implemented would be experienced as isolated and incongruous detached from the extent settlement.	High Harm
Purpose 3:	<i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i>	
	The release of these two land parcels would severely impact openness and would be experienced as detached from Codsall beyond well established and long-standing physical barriers. This is particularly the case for Site Promotion ref: 630	High Harm
Overall Harm:	New development would project outwards beyond the settlement and reduce the perception of openness and weaken the integrity of the adjacent Green Belt.	High Harm





**Table A2.7: ZLA’s Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for S51b Site Promotion ref: 630
<i>Visual Openness:</i>	The land parcel contains a small level of existing equestrian built and extensively enclosed by mature tree groups and robust woodland. This reduces the openness of the land, which is experienced as enclosed.
<i>Physical Openness:</i>	The land parcel contains a small level of existing equestrian built and extensively enclosed by mature tree groups and robust woodland. This reduces the openness of the land, which is experienced as enclosed.
<i>What is the relationship between the nearest settlement and the surrounding Green Belt?</i>	The surrounding Green Belt creates an extensive area of Green Belt to the west of Codsall which is contiguous outside of the settlement boundary.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	No Public Right of Way passes through the site area.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	Limited intactness. There are significant elements of degraded and missing field hedgerows and limited scattered hedgerow trees (typical feature of the host landscape character area).

**Table A2.8: ZLA’s Assessment of boundary resilience**

Evaluation Question	ZLA comments for S51b Site Promotion ref: 630
<i>Significance and permanence of boundaries:</i>	The land parcel is situated with extensively vegetated boundaries and the neighbouring railway line. These features are a mixture of manmade and natural and also include nearby vehicle routes which also define the urban to Green Belt transition area on the west of Codsall. Green Belt is contiguous along Oaken Lane, and if the Green Belt is re-aligned to these features, it would not be more robust. Any small-scale realignment for ‘infill’ like development would be inconsistent with the current Green Belt edge weakening the integrity of the adjacent Green Belt.



**S41a Site Promotion ref: 217**

Image A2.3: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 521. N.B. The approximate location and quantum of S41a Site Promotion ref: 217 is illustrated by the Local Planning Authority. The site is situated east of Codsall and not illustrated on the below image

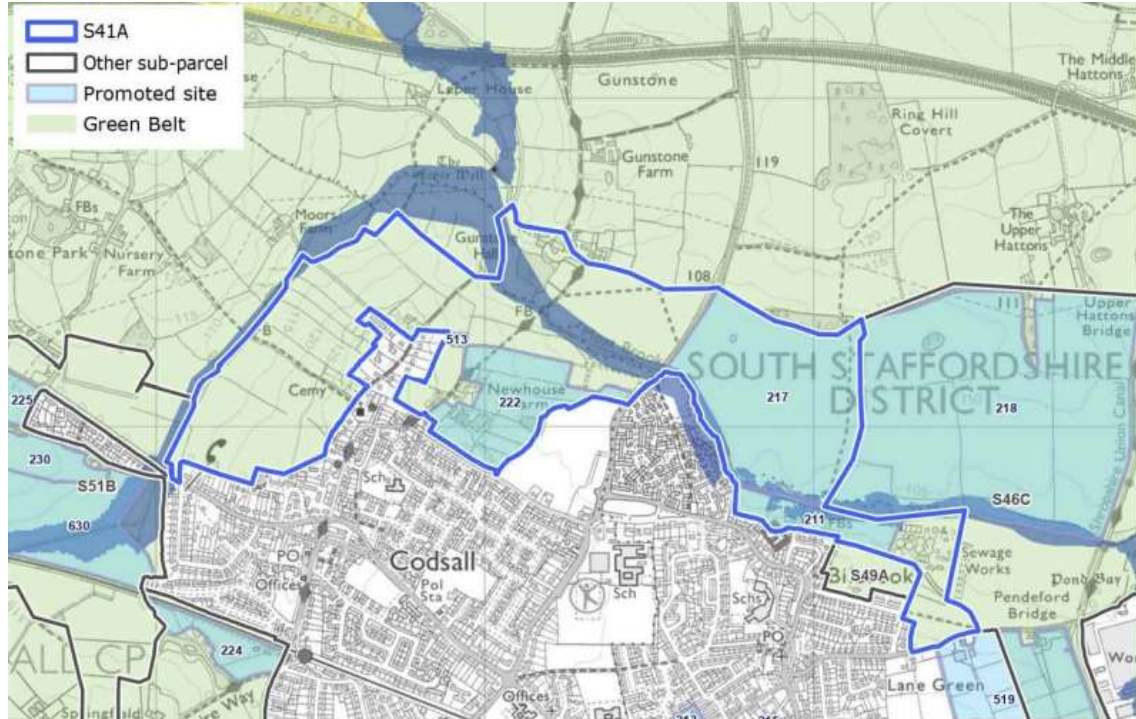


Table A2.9: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for S41a Site Promotion ref: 217	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas.</i></p>	<p><i>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</i></p> <p>This land parcel is situated outside of the perceived settlement edge of Bilbrook and the northern edge of Codsall. The land parcel is north of the Moat Brook and extensive tree groups and field hedgerows. The land parcel is detached from Bilbrook and the residential curtilages of existing built form on rising landform. The northern, eastern and western site area is relatively open with only outgrown hedgerows and scattered trees to the west. A narrow local vehicle route is to the north and an open field edge. Development would be experienced as detached from the existing settlement and outside of the town's-built limits. The site does not contain built form or is it influenced by urban features retaining a strong relationship with the wider open countryside with which it has a spatial equivalence to the wider setting.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 2: To prevent neighbouring towns from merging into one another.</i></p>	<p><i>Does the parcel lie directly between two settlements and form all or part of a gap between them?</i></p> <p>Whilst the land area plays no significant role in the distance between Codsall and Albrighton, development of the land would be seen as an isolated settlement outlying to Bilbrook, and also the northern edge of Codsall.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment.</i></p>	<p><i>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</i></p> <p>The land parcel contains the characteristics of the open countryside in terms of field pattern and scale, robust native hedgerows with scattered trees and extensive tree groups along brooks which pass through arable fields (typical of the host landscape character area). The southern boundary to the land parcel is sufficiently robust to significantly filter if not screen direct views of Bilbrook with only a limited perception of development on the northern edge of the town.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 4: To preserve the setting and special character of historic towns.</i></p>	<p><i>What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?</i></p> <p>The site does not contribute to the setting or special character of a historic town.</p>	<p>No Contribution</p>



<p><i>GB Purpose 5: To assist in urban regeneration by encouraging the recycling of the derelict land</i></p>	<p><i>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?</i></p>	
	<p>The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.</p>	<p>Strong Contribution</p>
<p>Overall Contribution</p>	<p>The land parcel plays an important role in preventing urban sprawl and encroachment in to the open countryside. The release of this land would significantly alter the existing settlement pattern as it would extend outwards beyond long standing physical durable features which contain the urban built form and features of Bilbrook, and with wider views of Codsall too.</p>	<p>Strong Contribution</p>

**Table A2.10: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt**

Criteria	ZLA's Assessment for S41a Site Promotion ref: 217	Grading
<p><i>Purpose 1:</i></p>	<p><i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i></p>	
	<p>The release of the land parcel would significantly impact openness and would adversely impact the Green Belt through the introduction of built form and urban features in isolation outside and detached from the settlement of Bilbrook. This would weaken the function of the adjacent Green Belt.</p>	<p>Very High</p>
<p><i>Purpose 2:</i></p>	<p><i>How strong would the remaining settlement gap be if the Green Belt land were released?</i></p>	
	<p>The release of the land parcel would create a detached settlement outlying to Codsall. This would weaken the function of the adjacent Green Belt.</p>	<p>Very High</p>
<p><i>Purpose 3:</i></p>	<p><i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i></p>	
	<p>The release of the land parcel would introduce new built form and urban features into open countryside which creates the setting for Bilbrook impacting the openness physically and perceptually of countryside.</p>	<p>Very High</p>
<p>Overall Harm:</p>	<p>This land parcel makes strong contribution to multiple Green Belt purposes and its release for development would impact the openness of the countryside surrounding the settlement of Bilbrook introducing new built form and urban features isolated from Bilbrook in an outlying location. This would weaken the function of the Green Belt.</p>	<p>Very High</p>



**Table A2.11: ZLA’s Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for S41a Site Promotion ref: 217
<i>Visual Openness:</i>	Long range views across broad, open countryside discernible. There is limited intervisibility with the settlement of Bilbrook. The land parcel has a stronger relationship with open countryside than the urban settlement.
<i>Physical Openness:</i>	This land parcel does not contain development or urban features and there is limited intervisibility with Bilbrook, and the wider edge of Codsall. The land parcel is experienced as open with in the wider setting of open countryside surrounding Bilbrook.
<i>What is the relationship between the settlement and the surrounding Green Belt?</i>	The open countryside forms the setting for the northern edge of Codsall within which the Staffordshire Worcestershire Canal passes through. The land parcel is detached from the settlement and would potential impact the setting of Bilbrook.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	A Public Right of Way passes through the eastern edge of the land parcel, and there is a modest network of Public Rights of Way within the immediate open countryside surrounding the land parcel. The land is seen from this public access routes.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No. However, the land parcel is situated in open countryside north of the settlement within which there is a strong sense of open countryside and limited built form. This land would have a high sensitivity and susceptibility to change in landscape and visual terms.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	Moderately intact field pattern and size with typical field hedgerows and scattered hedgerow trees. Arable farming is common.

**Table A2.12: ZLA’s Assessment of Boundary resilience**

Evaluation Question	ZLA comments for S41a Site Promotion ref: 217
<i>Significance and permanence of boundaries:</i>	The land parcel is relatively naked and open to its eastern and western edges whereby there is strong intervisibility with the wider open countryside. Physical features to the north and east are manmade and long standing (local minor vehicle route). In combination, these physical features do not robustly enclose the site and there is intervisibility and connectivity with the wider open countryside. It is anticipated, might this land parcel be released, it would require the establishment of significant landscape buffers to ensure the integrity of the wider Green Belt.





**S41a Site Promotion ref: 222**

Image A2.3: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 521. N.B. The approximate location and quantum of S41a Site Promotion ref: 222 is illustrated by the Local Planning Authority. The site is situated east of Codsall and not illustrated on the below image

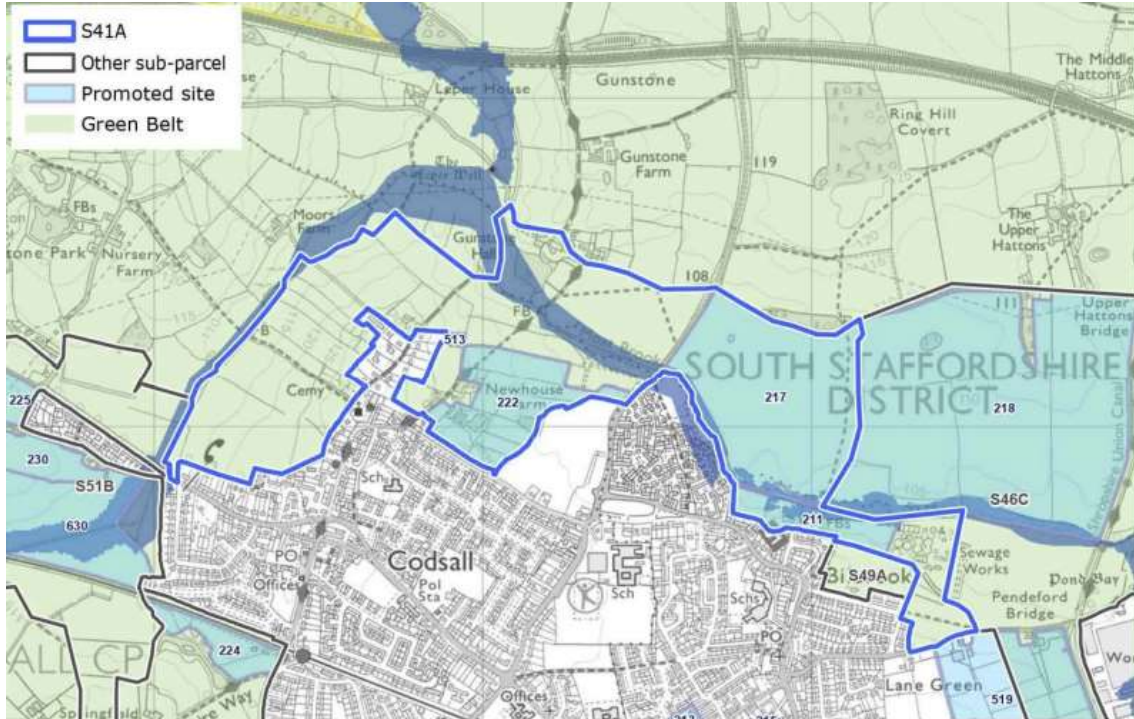


Table A2.13: Part One Green Belt Assessment of the comparative site areas– grading against Green Belt purposes

NPPF Para 138 Green Belt Test	ZLA's Assessment for S41a Site Promotion ref: 222	Grading
<p><i>GB Purpose 1: To check the unrestricted sprawl of large built-up areas.</i></p>	<p><i>Does the parcel play a role in preventing ribbon development, particularly along major transport corridors, and/or has the Green Belt already been compromised by ribbon development?</i></p> <p>This land parcel is situated outside of an inconsistent settlement edge to Codsall. The land parcel is elevated above the neighbouring residential development on Gunstone Lane and Sandy Lane and is extensively overlooked by urban development and residential curtilage along this neighbouring roads. The land parcel includes built form (agricultural) and also public allotments (urban land use). The land parcel is bounded to the east by newly completed residential development. Hedgerows and scattered mature trees in dense and limiting of views into and out of the land parcel in places. The northern boundary is quite open and naked to the wider open countryside which is readily seen from the land parcel. The site does contain built form or is influenced by urban features retaining a strong relationship with the wider open countryside with which it has a spatial equivalence to the wider setting.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 2: To prevent neighbouring towns from merging into one another.</i></p>	<p><i>Does the parcel lie directly between two settlements and form all or part of a gap between them?</i></p> <p>Whilst the land area plays no significant role in the distance between Codsall and Albrighton, development of the land would be seen as an isolated settlement outlying to Codsall and would impact the distinction of Codsall.</p>	<p>Moderate Contribution</p>
<p><i>GB Purpose 3: To assist in safeguarding the countryside from encroachment.</i></p>	<p><i>Has the parcel been affected by the encroachment of urbanising development (comprises open countryside, some urbanisation, openness compromised)?</i></p> <p>The land parcel contains the characteristics of the open countryside in terms of field pattern and scale, robust native hedgerows with scattered trees and pastoral fields (typical of the host landscape character area). The southern boundary to the land parcel is sufficiently robust to significantly filter views, but the landform within the site makes the interior of the site discernible from overlooking residential dwellings.</p>	<p>Strong Contribution</p>
<p><i>GB Purpose 4: To preserve the setting and special character of historic towns.</i></p>	<p><i>What is the proximity and degree of intervisibility with the historic core (such as a Conservation Area) of an historic town (proximate/good, partial, no connection)?</i></p> <p>The site does not contribute to the setting or special character of a historic town.</p>	<p>No Contribution</p>



<p><i>GB Purpose 5: To assist in urban regeneration by encouraging the recycling of the derelict land</i></p>	<p><i>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically (possible role, no clear role)?</i></p>	
	<p>The LPA considers that all land parcels are considered to make an equal contribution to this purpose and asserts a Strong Contribution.</p>	<p>Strong Contribution</p>
<p>Overall Contribution</p>	<p>The land parcel plays an important role in preventing urban sprawl and encroachment in to the open countryside. The release of this land would significantly alter the existing settlement pattern as it would extend outwards beyond long standing physical durable features which contain the urban built form and features of Codsall.</p>	<p>Strong Contribution</p>

**Table A2.14: Part Two Green Belt Assessment of potential impact of release on the integrity of the Green Belt**

Criteria	ZLA's Assessment for S41a Site Promotion ref: 222	Grading
<p><i>Purpose 1:</i></p>	<p><i>Would Green Belt release create or strengthen a relationship between adjacent Green Belt and a large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?</i></p>	
	<p>The release of the land parcel would significantly impact openness and would adversely impact the Green Belt through the introduction of built form and urban features on land that is elevated at the existing settlement edge. This would alter the inconsistent settlement edge/Green Belt boundary but would require significant landscape mitigation measures to contain the development if released to ensure openness is material harmed. This would weaken the function of the adjacent Green Belt.</p>	<p>Very High</p>
<p><i>Purpose 2:</i></p>	<p><i>How strong would the remaining settlement gap be if the Green Belt land were released?</i></p>	
	<p>The Green Belt outside of the land parcel is experienced as open with a strong sense of openness outside of Codsall. The landform within the site would make new development discernible necessitating the need for landscape mitigation. Without this, the release of the land would weaken the function of the adjacent Green Belt.</p>	<p>High</p>
<p><i>Purpose 3:</i></p>	<p><i>Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?</i></p>	
	<p>The release of the land parcel would introduce new built form and urban features into open countryside which creates the setting for Codsall impacting the openness physically and perceptually of countryside.</p>	<p>High</p>
<p>Overall Harm:</p>	<p>This land parcel makes strong contribution to multiple Green Belt purposes and its release for development would impact the openness of the countryside surrounding the settlement of Codsall introducing new built form and urban features isolated from Codsall in an outlying location. This would weaken the function of the Green Belt.</p>	<p>High</p>





**Table A2.15: ZLA's Assessment of Visual and Physical Openness and Boundary Quality**

Element	ZLA comments for S41a Site Promotion ref: 222
<i>Visual Openness:</i>	Long range views across broad, open countryside discernible. There is intervisibility with the settlement of Codsall. The land parcel has a stronger relationship with open countryside than the urban settlement.
<i>Physical Openness:</i>	This land parcel does contain development or urban features and there is intervisibility with Codsall. The land parcel is experienced as open with in the wider setting of open countryside surrounding Codsall.
<i>What is the relationship between the settlement and the surrounding Green Belt?</i>	The open countryside forms the setting for the northern edge of Codsall within which the Staffordshire Worcestershire Canal passes through. The land parcel is detached from the settlement and would outlying and detached from Codsall impact the setting of Codsall.
<i>What is the degree of existing public access and/or provision of recreational facilities?</i>	A Public Right of Way passes through the western edge of the land parcel (ref: Codsall 3) , and there is a modest network of Public Rights of Way within the immediate open countryside surrounding the land parcel. The land is seen from this public access route.
<i>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</i>	No. However, the land parcel is situated in open countryside north of the settlement within which there is a strong sense of open countryside and limited built form. Combined with the landform within the land parcel, this land would have a high sensitivity and susceptibility to change in landscape and visual terms.
<i>Are there any National or local biodiversity designations within the site?</i>	No.
<i>Is there any derelict land in the parcel?</i>	No.
<i>Intactness of host landscape character?</i>	Moderately intact field pattern and size with typical field hedgerows and scattered hedgerow trees. Pastural farming is common.

**Table A2.16: ZLA's Assessment of Boundary resilience**

Evaluation Question	ZLA comments for S41a Site Promotion ref: 222
<i>Significance and permanence of boundaries:</i>	The land parcel is relatively naked and open to its northern edge whereby there is strong intervisibility with the wider open countryside. Physical features to the east and south are manmade and long standing (local minor vehicle route and residential development of mixed ages). It is anticipated, might this land parcel be released, it would require the establishment of significant landscape buffers to ensure the integrity of the wider Green Belt.



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**APPENDIX THREE: PUBLISHED METHODOLOGY FOR GREEN BELT REVIEW PART ONE AND PART TWO  
(2019), SOUTH STAFFORDSHIRE DISTRICT COUNCIL**



# 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 inset<sup>43</sup> villages. If any significant areas of washed-over<sup>44</sup> 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.

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

<sup>44</sup> 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**

<b>Strong Contribution</b>	Green Belt performs well against the purpose.
<b>Moderate Contribution</b>	Green Belt performs moderately well against the purpose.
<b>Weak/No Contribution</b>	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 RTPI 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 NPPF<sup>45</sup>).
- 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)?

<sup>45</sup> 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**

<b>Purpose 1: Check the unrestricted sprawl of large built-up areas</b>	
Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.	
Location: land closer to the large, built-up area generally makes a stronger contribution.	
Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.	
Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.	
<b>Strong Contribution</b>	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.
<b>Moderate Contribution</b>	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.
<b>Weak/No Contribution</b>	Land adjacent or close to the large built-up area that is already fully urbanised; or land that is too contained by development to have any relationship with the wider countryside; or 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.

**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**

<b>Purpose 2: Prevent neighbouring towns from merging</b>	
<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>	
<b>Strong Contribution</b>	Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them.
<b>Moderate Contribution</b>	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 land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.
<b>Weak/No Contribution</b>	Land which is not located within a gap between towns; or 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 land which plays no significant role due to the extent of development; or 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).



**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**

<b>Purpose 3: Assist in safeguarding the countryside from encroachment</b>	
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.	
<b>Strong Contribution</b>	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms <sup>46</sup> ) and which does not have a stronger relationship with the urban area than with the wider countryside.

<sup>46</sup> 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.

<b>Moderate Contribution</b>	<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>
<b>Weak/No Contribution</b>	<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.	
<b>Strong Contribution</b>	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town’s setting or special character.
<b>Moderate Contribution</b>	The land and its openness makes some contribution to the characteristics identified as contributing to a historic town’s setting or special character.
<b>Weak/No Contribution</b>	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.



# Part C: Stage 2 Methodology and Findings





## 6 Stage 2 Methodology

### Introduction

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

### Identification of assessment areas for Stage 2 assessment

- 6.2 In discussion with the Council, the assessment area for Stage 2 incorporated:
- Land within South Staffordshire adjacent to selected inset settlements, adjacent to settlements abutting the Green Belt's outer edge, or adjacent to inset development in any of the Black Country districts.
  - Promoted development sites identified by the Council identified in their Strategic Housing and Economic Land Availability Assessment (SHELAA), either as extensions to existing settlements or as new settlement options. SHELAA sites were included in the Green Belt review where they were identified as 'potentially suitable' sites for urban extensions or new settlements, or where they could be considered as a 'potentially suitable' site for the expansion of a Tier 1-4 settlement (as identified in the Rural Services and Facilities Audit 2018). This was informed by the most up-to-date 'call for sites' submissions available at the time of this assessment.
- 6.3 The promoted sites provided in this report are for information only, and may not be comprehensive as new sites may emerge following publication. It should be noted that there are some cross-boundary promoted sites which may have been submitted through Black Country and / or South Staffordshire 'call for sites' exercise. A comprehensive and up-to-date map and list of 'call for sites' can be found at: <https://blackcountrycorestrategy.dudley.gov.uk/t5/> and <https://www.sstaffs.gov.uk/planning/shlaa-5-year-supply.cfm>.
- 6.4 Land was assessed at Stage 2 as 'sub-parcels', and where Stage 1 parcels occupied a large area, which abutted more than one inset settlement edge, they were split into multiple sub-parcels at Stage 2.
- 6.5 Land which is constrained by absolute constraints was excluded from the assessment area for Stage 2. All of the areas identified for consideration at Stage 2 were overlaid with a set of 'absolute' environmental constraints – i.e. areas within which the Council would currently not permit development<sup>47</sup>, these were identified as:
- Cultural Heritage:
    - Scheduled Monuments (SMs).
    - Registered Parks and Gardens.
  - Natural Heritage:
    - Special Areas of Conservation (SACs).
    - Sites of Special Scientific Interest.
    - National Nature Reserve.
    - Local Nature Reserves.
    - Sites of Importance for Nature Conservation (SINC) / Sites of Biological Importance (SBI).
    - Ancient Woodland.

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

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

- 6.6 Defined sub-parcels excluded these areas of constraint where practical. The shape of areas of constraint, and of unconstrained areas around, did in some instances make it simpler to define sub-parcels that do include constrained areas, but in all instances the Stage 2 harm assessment disregarded these on the basis that, whether or not defined as Green Belt, they would not be developed. Stage 1 parcels that were identified as being wholly constrained, or so highly constrained by absolute constraints that it was not considered that they could provide potential sites for development, were excluded from the Stage 2 assessment of sub-parcels. Additional constraints, such as landscape sensitivity (as set out in the Stage 3 report) and the assessment of Green Belt harm (as set out in this report), will be considered as part of the wider evidence base<sup>48</sup> that will together inform site selection and the potential 'exceptional circumstances' to justify release of the land from the Green Belt.
- 6.7 The assessment parcels did not cover areas beyond South Staffordshire, even if there were no clearly defined boundaries on the ground. In some cases, the commentaries on individual parcels have offered comments as to whether features on the ground might provide possible boundaries in future, but this Study does not provide an assessment of the contribution to Green Belt Purposes or a basis to consider the harm of releasing land in neighbouring districts. The assessments did, however, consider all relevant factors such as the presence of towns and physical features beyond the study boundary, where relevant to the analysis.

## Links between Stage 1 and Stage 2 assessment

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

## Stage 2 Assessment Process

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

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

## Criteria for Assessment of Harm resulting from Green Belt Release

### Step 1: Consider contribution ratings in more depth

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

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

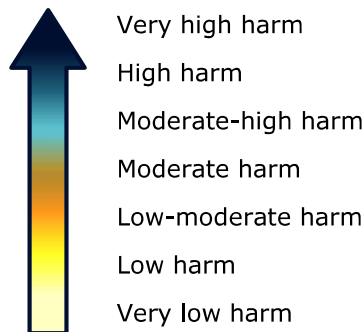
- 6.16 The assessment of contribution at Stage 1 already considers the relationship between a parcel and adjacent Green Belt land, but at the sub-parcel level it is possible to address how the loss of a specific area of land will affect Green Belt boundaries and the strength/ integrity of the adjacent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



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

### Step 3: Assess overall Green Belt harm

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

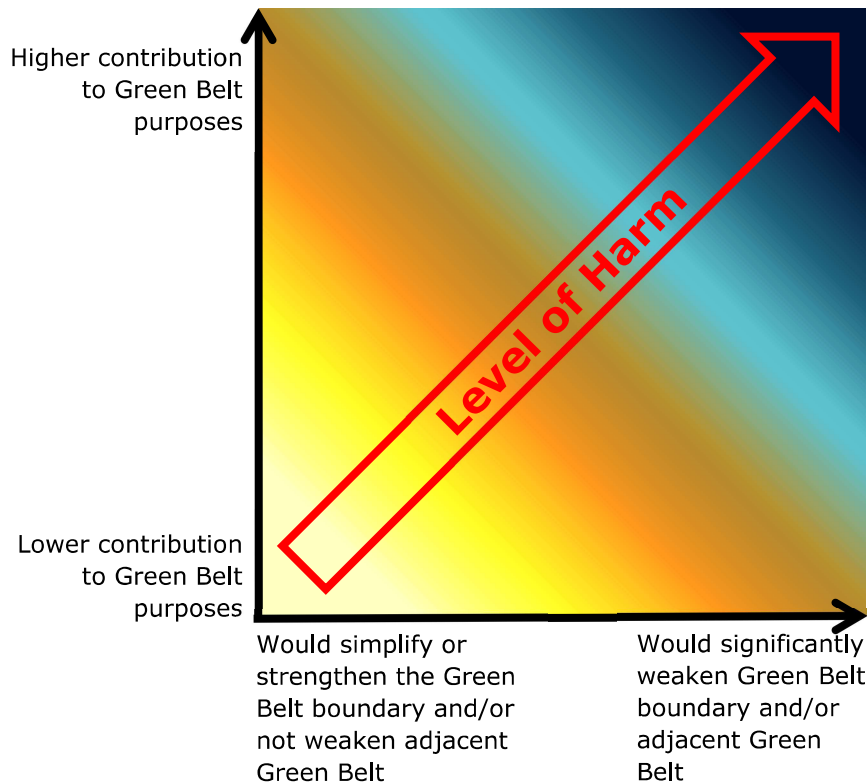


6.23 **Figure 6.1** provides an indication as to how the contribution to the Green Belt and the impact on adjacent Green Belt and the strength of the boundary influence the overall harm of Green Belt release. However, **professional judgement** was required in each individual case to consider how much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

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

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

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



**Step 4: Consider harm resulting from alternative release ‘scenarios’**

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

**Stage 2 Assessment Outputs**

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

- 1:25,000 scale Ordnance Survey map showing parcel/site and surrounding context, with absolute development constraints and any nearby assessment parcels/sites<sup>49</sup>.
- An aerial view of the mapped area.
- A photograph of the assessment area<sup>50</sup>.
- Text setting out the analysis of harm that would result from release of the whole assessment area, together with a harm rating.
- Harm analysis and rating for any alternative release scenarios identified for the assessment area, where potential harm could be reduced by release of a smaller area of land.

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

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<sup>49</sup> Promoted sites within South Staffordshire are labelled in dark blue and promoted sites within the Black Country are labelled in light blue.  Promoted site (SS)  Promoted site (BC)

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

## APPENDIX FOUR: TITLE PLAN FOR THE SITE AREA APPRAISED





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