

APPENDIX 2

Green Belt Criteria Comparison Report

GREEN BELT CRITERIA COMPARISON

Springhill Lane (Site 494a/494b)

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1.0 Introduction

South Staffordshire District Council (SSDC) is currently undertaking a local plan review with regard to the potential release of land from the Green Belt for housing development. CJZ Design Limited have commissioned SLR Consulting Limited to prepare this report in support of their 'Promoted' site to the north of Springhill Lane, Wolverhampton. The report includes a review of the Preferred Options Document and other relevant documents within the evidence base including the Sustainability Appraisal (SA), individual site assessments, landscape sensitivity and Green Belt studies. The report specifically compares the 'Promoted' site with the 'Preferred' site (North of Langley Road), the latter being located approximately 1 km to the north of the former, to help inform the selection process. The 'Preferred' site is identified in the Local Plan Review, Preferred Options¹ on Page 150.

There are three key criteria from the SA where the 'Promoted' site scores differently from the 'preferred' site, these being;

- Green Belt;
- Ecology; and
- Socioeconomics.

This report concentrates on the Green Belt aspects, with other separate submissions addressing the other criteria and specific planning considerations.

1.1 Consulted Documents

As well as a general high-level review of landscape and visual baseline information and considerations, a number of specific documents have been reviewed and these include the following:

- The South Staffordshire Green Belt Study (July 2019) Stage 1 and 2 Report and Appendix 3: Land Use Consultants (LUC);
- The South Staffordshire Landscape Sensitivity Assessment (July 2019) including Appendix 1 Landscape Sensitivity Assessments (LUC);
- Sustainability Appraisal of the South Staffordshire Local Plan Review (August 2021), Preferred Options Plan, Regulation 19 (III) SA Report: Lepus Consulting;
- Sustainability Appraisal of the South Staffordshire Local Plan Review, Spatial Housing Strategy and Infrastructure Delivery (August 2019): Lepus Consulting;
- South Staffordshire Council, Local Plan Review, Spatial Housing Strategy & Infrastructure Delivery (October 2019), Appendix 6, Site Selection Methodology for Preferred Options; and
- A New Development Strategy for South Staffordshire 2018-2038, The Local Plan Review, Preferred Options (September 2021).

¹ A New Development Strategy for South Staffordshire 2018-2038: Local Plan review, Preferred Options (September 2021)

2.0 Review of Site Selection Process

This process is defined in Appendix 6 of the 'Site Selection Methodology for Preferred Options' which refers to the following elements;

- Green Belt Harm;
- Landscape Sensitivity;
- Sustainability Appraisal;
- Known Site Constraints;
- Site Specific Opportunities.

The first three of these elements are examined in this report as they relate to landscape and visual issues and help determine the overall level of effect on the Green Belt.

2.1 Factors Involved in Green Belt Harm

Consideration must be given to the nature and extent of harm to the Green Belt and its purposes, for sites identified for release from the Green Belt. To examine the potential for harm to the Green Belt the 'LUC Green Belt Study 2019' is referenced below;

*"This establishes the harm to the Green Belt that would result from the release of areas of land within the district and identifies where the release of land would simplify the Green Belt boundary. Therefore, for assessing the Green Belt harm arising from the allocation of individual site options, the findings of the Green Belt Study 2019 for the area of land in question will be compared with the site suggestion under consideration to determine the harm from releasing that individual site proposal."*²

The LUC Green Belt Study first considers the contribution made by land to the Green Belt purposes, whereas a second stage assesses the harm that would occur to the Green Belt. This second stage considers the contribution of the site to Green Belt purposes in more depth, as well as the impacts of the release on the strength of residual Green Belt boundaries and the integrity of the remaining Green Belt land. The overall level of harm is then identified.

The LUC study states that;

*"The factors which influence the assessment of harm are the same as those which determine variations in contribution, but considering a specific area of land allows a more detailed analysis of where the role of site/parcel location, size and boundaries and how these are weighed up alongside the strategic contribution findings (relating to each Green Belt purpose) in order to arrive at a single overall harm rating. The assessment process also allows 'sub site or sub area scenarios' to be identified where smaller areas of land (i.e. part of a site or parcel) could potentially be released with less resultant harm to Green Belt purposes. This information on Green Belt harm, can be weighed up by the Council alongside sustainability and viability considerations to make decisions on the potential suitability of releasing Green Belt land."*³

In conjunction with the Green Belt Study an assessment of the sensitivity of areas to housing and employment development was undertaken and reported in 'The South Staffordshire Landscape Sensitivity Assessment (July 2019)'. The Green Belt Study recognises the importance of this document as follows;

² South Staffordshire Council, Local Plan Review, Spatial Housing Strategy & Infrastructure Delivery (October 2019), Appendix 6, Site Selection Methodology for Preferred Options - Paragraph 4.2.

³ The South Staffordshire Green Belt Study (July 2019) Stage 1 and 2 Report – Paragraph 1.8

“There is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character and sensitivity are also likely to play a role in the spatial relationship between urban areas and the countryside. However there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land.”

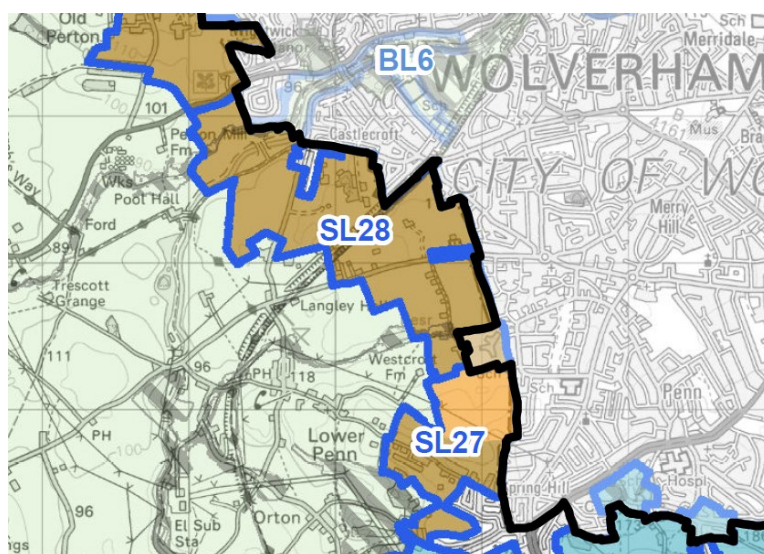
The following section reviews the findings of the Sensitivity Assessment undertaken to identify the important physical attributes which define landscape character and sensitivity of each of the two sites under examination. And in addition how these affect the spatial relationship between the adjacent urban areas of each of the two sites under consideration and the countryside of the Green Belt under review.

2.2 South Staffordshire Landscape Sensitivity Assessment (SSLSA)

A landscape sensitivity was undertaken (by LUC) for all Green Belt land within the four Black Country boroughs and South Staffordshire District Council in September 2018. The section of the study covering South Staffordshire was published as the South Staffordshire Landscape Sensitivity Assessment⁴.

Within this document the ‘Promoted’ site (Site 494 - Springhill Lane) is identified as part of Landscape Area SL27, while the ‘Preferred’ site (Site 582 - North of Langley Road) is identified as part of Landscape Area SL28. This is shown in ‘Figure 4.4: Landscape Sensitivity Assessment – South Staffordshire South of the SSLSA’, and with an extract reproduced below in Figure 1.

Figure 1
Landscape Sensitivity Assessment Areas (Extract from Figure 4.4 SSLSA)



- Area SL27 including Springhill Lane (494) is given a Low-Moderate/Moderate sensitivity; and
- Area SL28 including North of Langley Road (582) is given a Moderate sensitivity.

Overall moderate sensitivity is defined in Table 3.2 of the SSLSA as *‘the presence of some distinctive characteristics and valued qualities, with sensitivity to change as a result of introducing built development’*.

⁴ South Staffordshire Landscape Sensitivity Assessment: LUC (July 2019)

Low sensitivity is defined in Table 3.2 as *'The landscape lacks distinct character and qualities and has few notable features, or is robust with regard to introducing built development.'*

Area S27 (including 'Promoted' site) therefore spans the range between these two levels but is overall less sensitive than Area 28 (including 'Preferred' site). Of particular note is the description of perceptual aspects which states;

"The area has some rural perceptual qualities and is relatively tranquil. However, this sense of rural character is reduced due to the wide visibility of surrounding settlement including long distance views of the tower blocks within Wolverhampton."

2.2.1 Appraisal of Landscape Sensitivity Comparison

Appendix 1 of the SSLSA provides more detail on the factors considered in making these sensitivity judgements for both areas S27 and S28.

Area SL27 (containing 'Promoted' site)

The landscape sensitivity for SL27 is based on ten characteristics/attributes, six of these factors include an entry in the lower sensitivity column, four entries in the moderate sensitivity column and two entries in the higher sensitive column. The study then divides the area into two sections namely SL27s1 and SL27s2 based on aspects of their identified landscape sensitivity.

In the SL27s1 area the Landscape Sensitivity Judgement is summarised as Low-Moderate Sensitivity for the area on the basis that *"Despite considerable time depth, the lower slopes of the landscape area are considered to have low-moderate overall landscape sensitivity to residential development due to the lack of natural and cultural heritage designations, lack of public access and harsh settlement edge."*

The entry in the higher sensitivity column is for 'Landscape pattern and time depth' and states *"The landscape has a strong time depth with irregular fields originating from post-medieval piecemeal enclosure in the north and post-medieval small irregular fields in the south. There has been comparatively little change in the landscape pattern post-war."*

This report would support the reasoning with regard to the lack of heritage designations, public access and the harsh settlement edge, but not the pattern/time depth which is specifically listed for area SL27s1 at a Higher sensitivity level; this aspect is examined below in more detail.

In depth examination of the pattern/time depth characteristic/attribute raises queries with regard to the degraded landscape pattern and time depth as follows. The Wolverhampton borough boundary cuts through an original historic field⁵ with the eastern half used for housing and the western half for the allotments⁶. The field to the west of the allotments is shown on modern mapping/aerial photographs as being quartered but was historically one field⁷. The field to the north of these two fields is now the location of Highfields School with the site first used circa 1960⁸. The boundary to the south of the quartered field has been realigned during the same period. Other than the boundary realignment the field to the south is relatively intact. The next field further to the south has lost a north south boundary just west of the pylon that is present. To the west one of the two fields present have lost its southern boundary. Thus, the historically field pattern and land uses within this area have undergone a degree of change, and not as stated in the sensitivity appraisal undergone *comparatively little change in the landscape pattern post-war*.

⁵ Ordnance Survey historic map 25 Inch (1892-1914)

⁶ OS historic map 1:25,000 (outline) (1945-1961)

⁷ OS historic map 1:10,560 (1949-1970)

⁸ OS historic map 1:25,000 (outline) (1945-1961)

However, overall it is concluded that the Low-Moderate sensitivity level arrived at is likely to be an accurate overall judgement. Although the higher sensitivity attribute level for time depth seems questionable, given the above observations.

The SL27s2 area Landscape Sensitivity Judgement is summarised as Moderate Sensitivity and is raised higher than SL27s1 due to *“The sloping nature of the landform makes the higher slopes visually prominent within the wider landscape.”* It is agreed the slopes are visually prominent within the wider landscape and thus more sensitive. However it is the urban context of the prominent land which is the important factor to consider.

Residential development along Springhill Lane, in conjunction with the urban edge of Wolverhampton, presents an elevated urban edge along the ridge line. This is further added to by the permitted back garden development of Sandhills Day Nursery on the top of the ridge, the redevelopment of Highfields School and views of two Wolverhampton tower blocks all adding to the harsh edge of the existing settlement (as identified in Settlement Setting) which encloses the northern half of SL27s2. It is not that the slopes are visual prominent, but rather it is the urban development which is prominent along the tops of the slopes which provides a strong urban context. The promoted site would provide opportunities to create a potentially softer urban edge by including open green space and vegetation cover on the slopes.

Area SL28 (containing ‘Preferred’ site)

In area SL28 the Landscape Sensitivity Judgement is stated as *“Based on the combination of landscape attributes outlined above, the area is judged to have an overall moderate sensitivity to residential development.”*

This judgement is based on ten characteristics/attributes, four of these factors include an entry in the lower sensitivity column, seven entries in the moderate sensitivity column and no entries in the higher sensitive column.

The overall conclusion is that there is no specific characteristic that raise the sensitivity, but a general level of moderate sensitivity occurs across a number of attributes for housing development in this area.

Of particular note is the strong boundary feature formed by the disused railway which provides *“Limited areas of semi-natural habitat include priority habitat deciduous woodland along the disused railway line which is designated as a local nature reserve (LNR)”* and *“Local heritage features include the Wolverhampton to Kingswinford Railway”* and *“Recreational opportunities include public footpath routes and traffic-free cycle routes along the canal towpath and the railway walk.”*

In addition the area has *“a sense of rural character and tranquillity, although this is impacted by signs of human activity and modern development, such as the overhead power line and larger scale development (tower blocks and a school) on the edge of Wolverhampton.”* Although this influence of the urban environment is more limited due to the flat landform in comparison to SL27 and as set out next.

Comparison of ‘Promoted’ and Preferred sites

This section compares the urban influence on the ‘Promoted’ and ‘Preferred’ sites.

The higher land of SL27 is formed by a north-east to south-west ridge which runs roughly along the line of Springhill Lane and also along the north-south edge of the borough of Wolverhampton to the east has a strong urban character due to the level of development along it.

Figure 2
Urban Edge of Wolverhampton as seen from 'Promoted' Site



This higher ground forms a prominent skyline for the countryside to the west and north and is characterised by an urban edge of dense residential development within Wolverhampton (Figure 2) and extensive ribbon development along Springhill Lane (Figure 3) and infill development on the highest part of the ridge (Figure 4).

Figure 3
Urban Edge of Wolverhampton as seen from 'Promoted' Site



The 'Promoted' site within Area 27 is thus heavily influenced by the adjacent urban landscape, due to the prominence of the houses that overlook the lower ground to the north. Thus, the 'Promoted' site has a stronger relationship with the adjacent urban environment than the Green Belt and open countryside it is sited in.

Figure 4
Urban Edge of Wolverhampton as seen from ‘Promoted’ Site



The comparison the ‘Preferred’ site is well contained by the surrounding landscape and its relationship with the urban environment is weaker. Figure 5 shows the view form the edge of the South Staffordshire Railway Walk which forms the northern boundary of site 582 and although the Wolverhampton tower blocks, and urban edge can be seen they are filtered much more by vegetation present on the site and thus don’t dominate the site context. As a result the site appears distinct from the urban environment.

Figure 5
Urban Edge of Wolverhampton as seen from ‘Preferred’ Site



The following sections make use of the ‘Section 3 - Definition of Terms’ within the LUC Green Belt study and identifies the level of contribution to the Green Belt for both the ‘Promoted’ site (494a and 494b) and ‘Preferred’ site (582). At this stage of the Green Belt study both the ‘promoted site’ and ‘preferred option’ are identified within the same area (S59) as depicted by Figures 5.1 – 5.5 of the Green Belt Study.

2.3.1 Openness

Openness is an essential characteristic of Green Belts and thus a key consideration in the assessment of Green Belt purposes. Openness has both a spatial aspect and visual aspect.

The spatial aspect of openness in the Green Belt can be affected by the location, extent and form, of both new and existing developments. Not all development is considered to affect openness with various types of building such as those used for agriculture/forestry, outdoor sports and recreation not considered inappropriate within the Green Belt.

The visual aspect of openness is important in how it relates to the purposes of the Green Belt. Visual elements may have an affect on containing urban sprawl, keeping nearby towns apart visually, maintaining the visual settings of historic settlements, defining openness by either the general extent of visibility or the degree of enclosure.

2.3.2 Restricting Urban Sprawl (Green Belt Purpose 1)

In terms of restricting urban sprawl both the 'Promoted site' and 'Preferred' site are identified as making a 'strong contribution' to the Green Belt as part of area S59. Appendix 2 of the Green Belt Study⁹ provides more detail on this contribution to the Green Belt and states;

"Land is adjacent or close to the large built-up area, contains no or very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside."

Looking in more depth at the criteria used to make this distinction, as set out in the LUC Green Belt Study Paragraph 4.9 which states;

"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."

2.3.3 Preventing the Merging of Neighbouring Towns (Purpose 2)

The assessed parcel of land (Area S59), containing both the proposed and preferred sites, is stated as making no contribution to this purpose of the Green Belt for the reason that *"Land plays no significant role due to the distance between the West Midlands conurbation and Bridgnorth, its nearest neighbouring town"*.

2.3.4 Safeguarding Countryside from Encroachment (Purpose 3)

The LUC Green Belt Study assesses the contribution of area S59 as 'Strong' for safeguarding the countryside from encroachment. This is set out on Page 213¹⁰ as follows;

"Land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside."

2.3.5 Preserving the Setting/Character of Historic Towns (Purpose 4)

Land within the Area 59 does not contribute to the setting or special character of a historic town, and this remains correct for both the proposed and preferred sites.

2.3.6 Assisting Urban Regeneration (Purpose 5)

The study concludes that all parcels are considered to make an equal contribution to this Green Belt purpose.

⁹ LUC Green Belt Study, Appendix 2, Page 213

¹⁰ LUC Green Belt Study, Appendix 2, Page 213

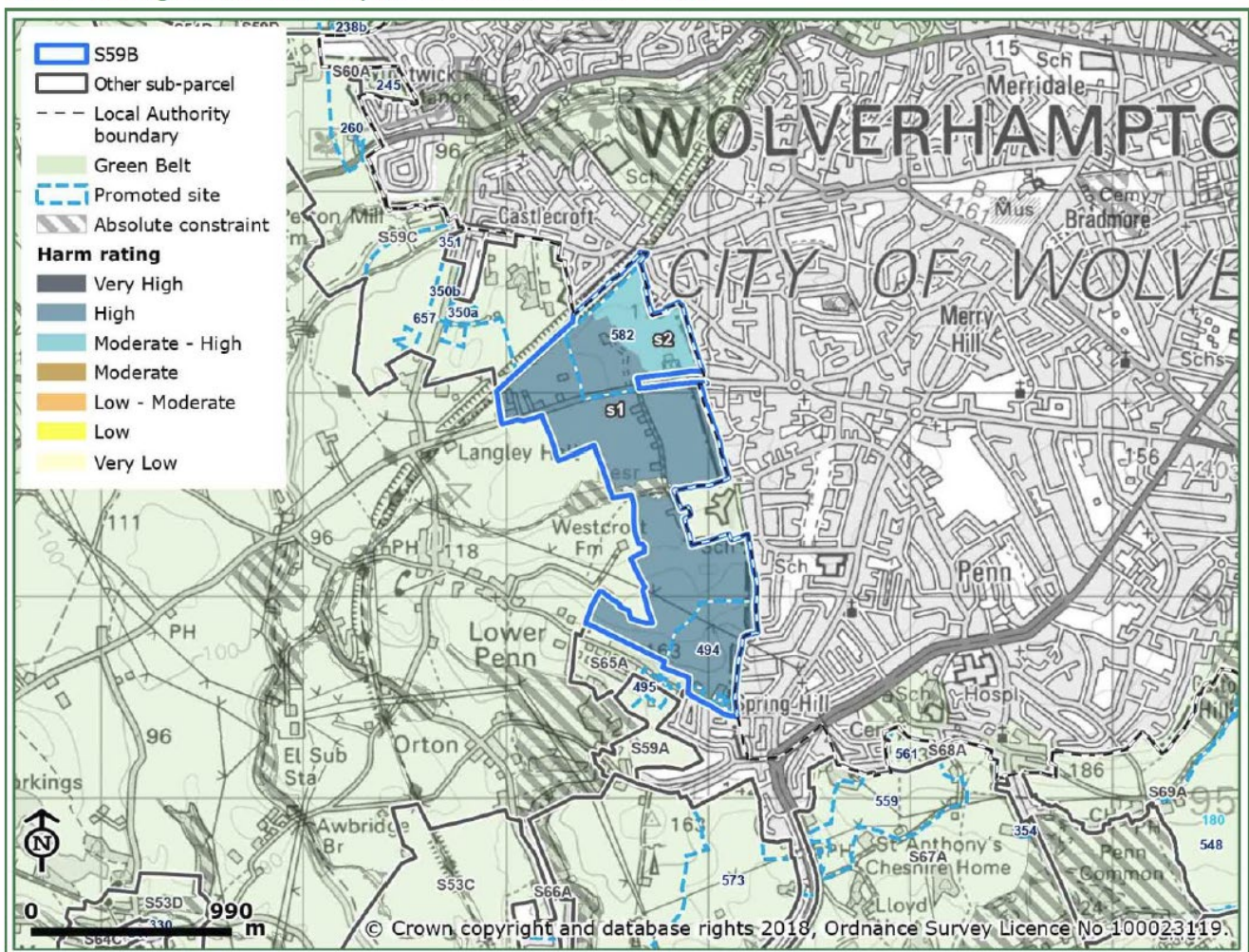
2.4 Examination of Green Belt Harm

At this stage in the LUC Green Belt Study parcel S59 has become divided into S59A, S59B and S59C with parcel S65A sandwiched between S59A and S59B.

Parcel S59B includes both the 'Promoted' site and 'Preferred site' (i.e. sites 494 and 582 respectively) as shown below in Figure 1. The conclusion of the harm assessment is also shown with the 'Promoted' site classed as having a high harm rating and the 'Preferred' site classed as having a mixture of both high and moderate/high harm ratings.

Figure 6
Assessment Parcels for Green Belt Harm (LUC Green Belt Study Appendix 3)

Harm Ratings Overview Map of Land within Sub-Parcel



- The sub-parcel makes a strong contribution to checking the sprawl of the West Midlands conurbation and to preventing encroachment of the countryside.
- The sub-parcel largely comprises open farmland and directly adjoins the settlement of Wolverhampton to the east.

- *The expansion of Wolverhampton into the sub-parcel would increase urban influence upon surrounding Green Belt land and would not create a stronger Green Belt boundary than the existing boundary of the inset area. As such, release of this land would constitute a limited weakening of the Green Belt.*
- *Release of this sub-parcel would contain Green Belt land to the east within the City of Wolverhampton District, so there would be no justification in retaining its Green Belt status, but this would not increase the level of harm to Green Belt purposes.*

The third of these points is not considered accurate, as illustrated in Figures 2-4, urban influences already exist in the raised urban edge of Wolverhampton and Springhill Lane, Highfields School, pylons and the Merry Hill tower blocks. As the 'Proposed site slopes sharply down and is well screened from the Green Belt to the west additional urban influences caused by the site development would be limited.

The assessment of 'Moderate-High' level of harm for area S59Bs2 (part of 582) is described as follows;

- *The sub-parcel makes a strong contribution to checking the sprawl of the West Midlands conurbation and to preventing encroachment of the countryside.*
- *This part of the sub-parcel is tightly contained by outcrops of the settlement of Wolverhampton. Release of this land would therefore have a negligible effect on the Green Belt.*

This description of S59Bs2 seems lacking in comparison to S59Bs1 and the following points are made.

The whole of S59 (including both sites) is described as having the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms) and is stated as not having a stronger relationship with the urban area than with the wider countryside. The majority of land within the 'Preferred' site 582 is agricultural land which directly adjoins the settlement of Wolverhampton to the east in the same way site 494 does to the south.

To the north of 582 is the vegetated form of the South Staffordshire Railway Walk which forms a strong landscape feature, physical barrier and effective Green Belt boundary against urban development to the north. Thus the site can hardly be described as being tightly enclosed by urban elements.

The housing along Langley road is ribbon development, outside the settlement of Wolverhampton, in the same way that Springhill Lane is ribbon development outside its adjacent urban edge. However the housing along Langley Road currently has open countryside to both the north and south, whereas the development along Springhill Lane is not just one line of houses and extends to the south as well.

Figure 7 illustrates part of the existing eastern edge of site 585 and the softer urban influences present in this location, re-enforcing the association of site 585 with the countryside, more than the urban environment.

Figure 7
Existing Urban Edge to North Eastern of 'Preferred' site (582)



This is emphasised by the South Staffordshire Railway Walk along the northern boundary of 585 and high level of tree cover present across the site in the form of woodland and hedgerow trees. Even the influence of the Merry Hill tower blocks is reduced by mature trees on hedgerow boundaries within the site (see Figure 5).

Of the 'Promoted' and 'Preferred' sites if either has greater urban influences on it, it would be the 'Promoted' site (494/S59Bs1) due to the following elements that are clearly visible from within the site;

- The prominent urban edge of Wolverhampton to the east;
- the ribbon development along Springhill Lane forming the southern skyline;
- the existing built development of Sandhills Day Nursery on the highest part of the 'Promoted' site;
- the large-scale development of Highfields School to the north; and
- the three high rise flats at Merry Hill.

There is also the presence of the electricity line and pylons which cross the site from the urban environment of Wolverhampton, creating a linking effect across the 'Promoted' site.

The strong urban influence on the 'Promoted' site is illustrated by a view from Springhill Lane near to the eastern edge of the site as shown in Figure 8, which looks along the western site boundary. This shows part of the ribbon development along Springhill Lane to the left, running past an electricity pylon on elevated ground (which screens the site from the land to the west), then continuing down to the major built development of Highfields School, then the high-rise blocks in Wolverhampton with the prominent edge of the residential area of Spring Hill running back to the right of the view. These elements form a much stronger urban enclosure at the 'Promoted' site, compared to that alluded to at the 'Preferred' site.

Figure 8
Surrounding Urban Elements Enclosing 'Promoted' Site



contours rise to the west of the 'Promoted' site boundary forming a raised landform that reinforces this western boundary and screens views into the 'Promoted' site from the countryside beyond.

The western boundary would enclose an area heavily influenced by urban features on the three on sides. As well as the aforementioned residential areas to the south and east, Highfields School forms a large built development as illustrated in Figure 9, and includes large, raised areas with tall gabion walls, all with a well-designed but very urban character.

Figure 9
Highfields School



Figure 10
Merry Hill Tower Blocks and Highfields School



2.5 Sustainability Appraisal

In the Lepus Consulting Sustainability Appraisal (August 2021) report the assessment of the ‘Promoted’ and ‘Preferred’ Sites being examined are referred to as sites 494a/494b and 582 respectively. The results for each site for the pre-mitigation and post-mitigation stages are shown in Figures 1 and 2 below.

Figure 11
 Extract form Table 4.4 Impact Matrix of Site Assessments Pre-mitigation

Table 4.4: Impact matrix of site assessments pre-mitigation

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Penn and Lower Penn												
350c	+/-	-	+/-	-	-	-	+	-	-	-	-	-
350d	+/-	-	+/-	-	-	-	+	-	-	-	-	-
494a	+/-	-	-	-	-	-	+	-	0	-	-	-
494b	+/-	-	-	-	-	-	+	-	0	-	-	-
559	+/-	+	+/-	-	-	-	+	-	-	-	-	-
561	+/-	+	+/-	-	-	-	+	-	-	-	-	-
573	+/-	-	-	-	-	-	+	-	-	-	-	-
579	+/-	-	+/-	-	-	-	+	-	-	-	-	-
582	+/-	-	+/-	-	-	-	+	-	-	-	++	-
710	+/-	-	+/-	-	-	-	+	-	0	-	-	-

These tables indicate that for Climate Change Adaptation the ‘Preferred’ site (582) scores a Major Negative whereas the ‘Promoted’ sites (494a & 494b) score a Minor Negative.

The ‘Promoted’ sites also have no Cultural Heritage effects even prior to mitigation, in comparison the ‘Preferred’ site has a Minor Negative for Cultural Heritage which is removed in Table 6.1.

Figure 12
 Extract form Table 6.1 Impact Matrix of Sustainability Appraisal Report

Table 6.1: Impact matrix of site assessments post-mitigation

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
Penn and Lower Penn												
350c	+/-	+	+/-	-	0	-	+	-	0	-	-	-
350d	+/-	+	+/-	-	-	-	+	-	0	-	-	-
494a	+/-	+	+/-	-	-	-	+	-	0	-	-	-
494b	+/-	+	+/-	-	-	-	+	-	0	-	-	-
559	+/-	+	+/-	-	-	-	+	-	0	-	-	-
561	+/-	+	+/-	-	-	-	+	-	0	-	-	-
573	+/-	+	+/-	-	-	-	+	-	0	-	-	-
579	+/-	0	+/-	-	-	-	+	-	0	-	-	-
582	+/-	+	+/-	-	-	-	+	-	0	-	++	-
710	+/-	+	+/-	-	-	-	+	-	0	-	-	-

2.5.1 SA Objective 2: Climate Change and Adaptation

This objective relates to fluvial and surface water flooding. Both the 'Preferred' and 'Promoted' sites are in Flood Zone 2. The mitigation for this flood risk is stated in Paragraph 3.2.4 of the Sustainability Appraisal as follows;

"In selecting the residential-led development proposals to be assessed as part of the SA process, SSDC eliminated any residential-led proposal where there was no capacity for development due to flood risk present (i.e. Flood Zone 3). As such, it has been assumed that where a residential-led proposal coincides with areas of high flood risk, that the proposed development would be located on land not at risk of flooding."

This may restrict the extent of development at either site. However, the 'Preferred' site also has a greater risk of surface water flooding (Low to High risk), in comparison to the 'Promoted' site which has a lesser risk (Low to Medium risk) as reflected in the Figure 1. In Paragraph 3.2.6 of the Sustainability Appraisal there seems to be an acceptance that flooding would occur;

"It is assumed that development proposals will be permanent, and it is therefore likely that the development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of surface water flooding."

Aerial photography indicates the presence of two large water bodies on the 'Preferred' site in April 2021 as shown in Figure 3. These water bodies appear to be expanding in size with each year (largest size March 2021) but reducing to almost nothing in summer (i.e. July 2015), when examined in Google Earth's historic imagery feature (timeline from 1945 to 2021). During the same period no surface water is present on the 'Promoted' site.

Figure 13
Google Earth Aerial Photograph of Northern part of Site 582 (April 2021)



The ponds on Site 582 suggest surface water flooding to be an issue for the site with development on the highest ground naturally draining outwards either northwards towards these water bodies or southwards to the properties north of Langley Road.

As concluded in Paragraph B.17.2.2;

“The proposed development at these four sites (Sites 350c, 350d, 579 and 582) would be expected to have a major negative impact on pluvial flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations.”

There is no reference to surface water flooding mitigation measures in Section 3 for Objective 2: Surface Water Flooding other than the already quoted Paragraph 3.2.6 of the Sustainability Appraisal that states an acceptance of flooding.

Section 2.7 of the Sustainability Appraisal expands on the limitations of predicting effects and at Paragraph 2.7.3 states;

“SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way within the SA process and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.”

Without introducing site-based detail it is unclear how the issue of surface water flooding can be mitigated, and none is outlined, therefore the unmitigated level of risk should be used for this site.

2.5.2 SA Objective 9: Cultural Heritage

The ‘Promoted’ Site (494a & 494b) is one of the best performing options for Cultural Heritage as identified in Table 4.11 of the Sustainability Appraisal with the ‘Preferred’ site a minor negative effect on Cultural Heritage due to its position adjacent to the disused Wolverhampton and Kingswinford Railway. The

The post mitigation site assessments are outlined in Section 6 of the Sustainability Appraisal and for Cultural Heritage state;

“The draft policies would be expected to mitigate potential adverse impacts on the local historic environment which may occur as a consequence of the development of the sites, including impacts on Listed Buildings, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. Potential impacts on underground archaeology are uncertain as the significance of such features may not be known at this time. The requirement for a proportionate assessment should also include the proposals for any required mitigation.”

2.6 The Rejection of the ‘Promoted’ Site

Appendix F of the Sustainability Appraisal; Preferred Options identifies the sites that have been selected or rejected and the entries for the ‘Promoted’ and ‘Preferred’ sites are reproduced in Table 1.

Table 1
Summary Comparison of Tables F.1.1 Selected Sites and F.2.1 Rejected Sites

Key positives and negatives for Rejection or Selection	Site 494a - Land at Springhill Lane	Site 494b - Land at Springhill Lane	Site 582 – Land at Langley Road
Green Belt Harm	Similar Green Belt harm to the majority of land in this broad location (site is 'high')	Similar Green Belt harm to the majority of land in this broad location (site is 'high')	Majority of site area is of lesser Green Belt harm ('moderate-high') than the majority of other land in this broad location
Landscape Sensitivity	Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate')	Majority of the site is in similar landscape sensitivity to the majority of land in this broad location ('moderate' sensitivity), with the remainder being 'low-moderate' sensitivity	Similar landscape sensitivity to the majority of land in this broad location (site is 'moderate')
Sustainability Appraisal	Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal	Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal	Major negative impacts predicted against the landscape criteria in the Sustainability Appraisal
Conclusion	Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.	Having regard to all site assessment factors set out in the proforma, the site is not considered to perform so well compared to other site options that it should be allocated instead of, or in addition to, Site 582.	Having regard to all site assessment factors set out in the proforma, the site is considered to perform better than other site options and could deliver the Council's preferred spatial strategy.

Additional criteria, not related to Green Belt or landscape and visual criteria as identified in this report, include the following subjects in the final Rejection/Selection table;

- Highways – Highways authority raise initial concerns regarding site access and junctions in surrounding area (Sites 494a and 494b)
- Education - Major positive impacts predicted against education in the Sustainability Appraisal (Site 582)

These criteria are addressed in a separate planning submission.

3.0 Conclusion

The overall contribution to Green Belt Purposes is identified as the same for both the 'Promoted' and 'Preferred' sites with Green Belt Purposes 1 (urban sprawl), 3 (encroachment) and 5 (assisting urban regeneration) all rated as strong.

The site summaries set out in Appendix F of the sustainability Appraisal illustrate how close the 'Promoted' and 'Preferred' site are considered to be. In these summaries the 'Preferred' site has a lower sensitivity to housing

development in part, while the 'Preferred' site has a lower level of Green Belt harm in part. The final conclusions appear to rely on the assessment of 'moderate-high' Green Belt harm for the 'Preferred' site, in comparison to 'high' Green Belt harm for the 'Promoted' site to define the final decision.

The potential harm to the Green Belt is considered in Section 2.4 of this report and two points are evident as follows;

- The 'Preferred' site is described as being tightly contained by outcrops of the settlement of Wolverhampton. But as illustrated in Figure 5 and the presence of the disused railway to the north this is not correct.
- The 'Promoted' site is far more influenced by the adjacent urban environment than the 'Preferred' site and this influence already affects the adjacent Green Belt and would not increase if the site were developed. As defined in the SSLSA *"this sense of rural character is reduced due to the wide visibility of surrounding settlement including long distance views of the tower blocks within Wolverhampton"*.

Thus, it is considered that the 'Preferred' site performs more strongly contributing to the Green Belt terms and its development would result in greater harm.

The methodology for defining the level of harm caused to the Green Belt is identified in paragraph 6.23 of the Green Belt study which states that:

*"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**."* (it is assumed this excludes purpose 5 which is common to all sites)

The 'Preferred' site is stated as making a 'strong' contribution to three of the Green Belt purposes as stated for on Page 663 of Appendix 3 of the Green Belt Study. The release of this site would increase pressure on the Green Belt land further west. This Green Belt land forms a triangle of land trapped between the converging disused railway and Langley Road. This triangular area already has a notable level of development further along Langley Road and across back garden plots between Langley Road and the disused railway.

Thus, the level of Green Belt harm for the 'Preferred' site must amount to high and not moderate-high as defined.

In comparison, the 'Promoted' site also has a strong contribution to three of the Green Belt purposes as identified, but its potential to increase the containment of remaining Green Belt is much more limited. In addition, the urban influence on the adjacent Green Belt is already present along the prominent developed ridge top and no further urban influence is likely to extend into the Green Belt through the development of the 'Promoted' site. The 'Promoted' thus has a closer relationship with the adjacent urban area rather than the wider Green Belt and the high level of harm identified on the Green Belt is considered excessive and should be lower than identified.

The restriction of urban sprawl and effects on the Green Belt have already been examined in paragraph 2.3.2 with the reference to paragraph 4.9 of the Green Belt Study which states;

"Land that has a stronger relationship with a large built-up area than with open land, whether due to ... the dominance of adjacent urban development ... makes a weaker contribution to this purpose."

For these reasons it is considered that the harm to the Green Belt would be less for the 'Promoted' site in comparison to the 'Preferred' site.

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

belfast@slrconsulting.com

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: + 44 (0)1392 490152

GLASGOW

glasgow@slrconsulting.com

GUILDFORD

guildford@slrconsulting.com

LONDON

T: +44 (0)203 805 6418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER (Denton)

T: +44 (0)161 549 8410

MANCHESTER (Media City)

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 245 5153

SHREWSBURY

T: +44 (0)1743 23 9250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: + 353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)6 23 37 14 14