
GREEN BELT POSITION PAPER

ON BEHALF OF

BLOOR HOMES MIDLANDS

FOR

LAND NORTH EAST OF BRIDGNORTH ROAD,

WOMBOURNE,

SOUTH STAFFORDSHIRE

V4 December 2021



CONTENTS

1. EXECUTIVE SUMMARY	3
2. THE PURPOSE OF THIS GREEN BELT POSITION PAPER	7
3. BACKGROUND TO THE GREEN BELT DESIGNATION	8
4. CURRENT GREEN BELT ASSESSMENT UNDERTAKEN BY THE LOCAL PLANNING AUTHORITY	10
5. SITE SPECIFIC GREEN BELT ASSESSMENT	17
6. CONSIDERATION OF THE COUNCIL'S SUSTAINABILITY APPRAISAL (AUGUST 2021)	31
7. SUMMARY	35
8. CONCLUSION	38

APPENDICES

APPENDIX 1 – EXTRACT FROM DEFRA MAGIC MAP

APPENDIX 2 – PUBLISHED METHODOLOGY FOR GREEN BELT REVIEW PART ONE AND PART TWO (2019)

Document History

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EXECUTIVE SUMMARY

Zebra Landscape Architects ('ZLA') has been commissioned by Bloor Homes Midlands (the 'Promotor') to prepare this Green Belt Position Paper. The document appraises the Green Belt function of land north east of Bridgnorth Road, Wombourne, South Staffordshire (the 'site').

This Position Paper forms part of an independent technical evidence base to support the site's promotion through the Local Plan Review 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 winter during December 2021.

The Local Planning Authority undertook a Green Belt Review of land within its administrative authority. The review was published in July 2019 and is entitled the 'South Staffordshire Green Belt Study Stage 1 and 2 Report'.

The LPA's Stage 1 and 2 report 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.

ZLA's site specific appraisal contained within this Position Paper has been completed in line with the methodology published by the LPA's Green Belt Review (Part One and Two 2019 respectively). The use of this methodology ensures a robust approach has been taken that is consistent with that of the LPA's own Green Belt Review, and provides evidence of the suitability of the site for sustainable development in this regard and its release from the Green Belt.

To summarise the findings of our Green Belt appraisal of the site, we find that the site affords less of a contribution to the Green Belt than the wider land parcel of S72 (appraised in Part One of the LPA's Green Belt Review, 2019), and also S72sA1 and S72sA2 within Part Two of their Review; see Section 5 and 6 of this Position Paper.

The site is sandwiched between extensive native broadleaf woodland. These features define the southern periphery of Wombourne and include the Smestow Valley Railway Walk, Himley Plantation and the broadleaf spinney adjoining the site. This woodland is mature and long-established, limiting the intervisibility with the open countryside outside of the village. Inside of this, the site is enclosed further by the route of the Bridgnorth Road (B4176) as well as the extensive residential built form and the Stych Lane cemetery on the settlement edge of Wombourne.

The release of the site from the Green Belt would afford an opportunity for a consistent boundary treatment of Wombourne to better integrate the southern edge of the village into the landscape. Such measures would not weaken the integrity of the Green Belt, nor would it compromise the openness of the wider Green Belt. This is in part down to the combination of the site's location and its position within a relatively enclosed (and wooded location). Additionally, the provision of appropriate landscape proposals to enhance the land's robust durable edges would reduce the likely effect of development on the visual openness of the wider Green Belt. Currently, existing residential development neighbouring the site is readily seen through the site area, which would continue to be the case regardless of existing and new landscape features.



There is a visual dimension to the function and integrity of the Green Belt. The question of visual qualities is implicitly part of the concept of openness of the green belt as a matter of natural meaning of the language used in paragraph 138 of the NPPF. I consider this interpretation is also reinforced by the general guidance in paragraph 143-145, which introduce Section 13 on the protection of the Green Belt.

Furthermore, NPPF paragraph 142 states:

‘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.’

The development of the site affords the opportunity to provide public open space for amenity with permissive access for residents of the scheme, and the wider residents of the village. Additionally, the landscape of the site would enable ecological betterment and bio-diversity net gain through habitat creation, formal and informal landscaping.

The landscape management guidelines for the host LCT in the published assessment are to ‘maintain the tree cover’, ‘encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character’, ‘conserve and restore tree cover’ and ‘seek opportunities to enhance tree cover’.

Consequently, the scheme could also afford the opportunity to retain, protect and enhance the existing woodland spinney adjoining the site, as well as reinstate lost and degraded hedgerows in the site area (where practicable). These feature create ecological linkages for habitat creation and bio-diversity net gain, as well as retain and enhance the existing landscape character surrounding Wombourne. N.B. Further details are provided at Section 4 of ZLA’s landscape Position Paper (ref: ZLA_1242_Landscape) which supports the promotion of the Site.

The reference in NPPF paragraph 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.

There is an important visual dimension to checking “*the unrestricted sprawl of large built-up areas*” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality; part of the idea of the Green Belt is to relieve the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside and “*safeguarding the countryside from encroachment*” includes preservation of that quality of openness.

With regard to this site, which effectively represents the second phase of development at Himley Meadows, the question should be asked would the release of the land from the development ‘*preserve*’ the openness of the Green Belt. It can only sensibly mean that the effects on openness must not be harmful – understanding the verb ‘*preserve*’ in the sense of ‘*keep ... safe from harm*’ – rather than ‘*maintain (a state of things)*’ (Shorter Oxford English Dictionary, 4th edn.).

The release of this land from the Green Belt for a proposed development would have an effect on spatial openness, but it is unlikely to have a harmful effect on the visual openness of the Green Belt. Indeed, whilst the change to the site’s fabric and character would be discernible locally, it is considered that the eventual development will have no, or no additional, effect on the openness of the Green Belt, either visual or spatially.



From undertaking this site specific assessment, ZLA considers that the release of land north east of Bridgnorth Road would be sustainable and unlikely to lead harmful impacts to the openness of the Greenbelt.



1. INTRODUCTION

Introduction

- 1.1. Zebra Landscape Architects ('ZLA') has been commissioned by Bloor Homes Midlands (the 'Promotor') to prepare this Green Belt Position Paper. The document appraises the Green Belt function of land north east of Bridgnorth Road, Wombourne, South Staffordshire (the 'site').
- 1.2. This Position Paper forms part of an independent technical evidence base for ongoing discussion for the site's long term promotion of the site through the Local Plan Review 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 winter-time (December 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 north east of the Bridgnorth Road on the south eastern periphery of Wombourne, and is found at OS Grid Reference: SO 87330 91782 (site centre).
- 1.4. The site has an approximate quantum of circa. 10 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 Plan Review process. This document also informs their understanding and discussions around opportunities and constraints, feeding in to the masterplanning process for the site.
- 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 policy-making 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 suitable enhancement of remaining Green Belt which reinforces its 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 Three:** To consider the boundary resilience of the site. With 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. 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 (revised July 2021) advocates enhancement of Green Belts, stating (para. 145) that: '*local planning authorities should plan positively to enhance their beneficial use.*' Practically, this includes measures such as the provision of opportunities for access, outdoor sport and recreation, enhancing landscapes, visual amenity and biodiversity, and improving 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 GB 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 (revised 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. 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 would ensure that the LPA (South Staffordshire Council) would: *'satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period'*, as well as, ensuring any new boundaries are: *'defined 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 141).



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

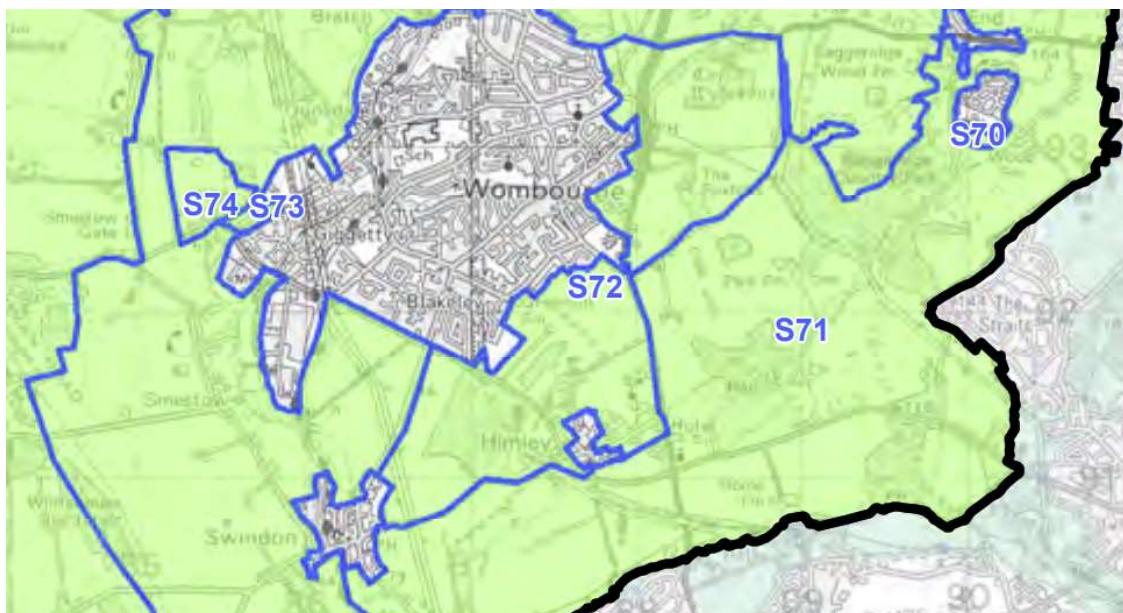
- 4.1. The Local Planning Authority undertook a Green Belt Review of land within its administrative authority. The review was published in July 2019 and was entitled the ‘South Staffordshire Green Belt Study Stage 1 and 2 Report’.
- 4.2. This review was undertaken independently by an expert third party, 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 undertook 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.
- 4.4. In the Stage 1 assessment the site was within a much larger tract of land which the LPA refers to as ‘S72’. S72 adjoins the existing settlement edge of Wombourne stretching from the north east to the south – south west of Wombourne; see Image 4.1.

Stage 1 Assessment: Tract of Land S72

- 4.5. The S72 tract of land includes the main vehicle route of the Stourbridge Road (A449) which passes through the northern extent of the land and has been utilised by the LPA to define the southern quantum of this land tract. To the south and south west local minor vehicle routes have also been utilised as edges to the land tract including Himley Lane and Wombourne Road.
- 4.6. The settlement edge of Wombourne and Swindon forms the western periphery of the S72 land tract, with Himley village washed over by the quantum of the S72 land tract.
- 4.7. The north-north eastern edge of S72 is defined by a local minor vehicle route (Woodhouse Lane) albeit this route is extensively used, and like the A449 carries extensive traffic. The eastern edge of the land tract is defined by robust hedgerows and the Himley Hall (Registered Park and Garden (Grade II)).



Image 4.1: Extract from South Staffordshire Green Belt Review 2019, Part One, page 57. S72 which was appraised by the Local Planning Authority in the aforementioned Green Belt Review Stage 1



- 4.8. Consequently, this Stage 1 assessment area is defined by long-established physical features including a settlement and vehicle routes (extensively used). The S72 land tract washes over a number of woodland spinneys and two woodland blocks (Hawkeswell Rough in the north east and Himley Plantation in the south).
- 4.9. ZLA notes that open land east of the A449 (and within the northern portion of S72) is managed predominantly as arable crop with linear woodland spinneys. To the west of the A449 (and within the southern portion of S72) land is managed mainly as equestrian and livestock pasture with a significant parcel of woodland (Himley Plantation); see Image 4.1.
- 4.10. With consideration of our DEFRA Magic Map search the S72 Stage 1 assessment area does not contain any National or local landscape designations such as an Area of Outstanding Natural Beauty, National Park, Local Green Space or Significant Gap.
- 4.11. The South Staffordshire Railway Walk (promoted route) is designated as a Local Nature Reserve and Himley Hall registered Park and Garden (Grade II) is situated east of the assessment area (across the A449); see Appendix 1. There is a small number of Public Rights of Way (PRoW) which passes through S72. The majority of these PRoW are located east of the A449.
- 4.12. In this Stage 1 assessment the LPA appraise the land tract as having the following:
- **Purpose 1:** To Check the Unrestricted Sprawl of Large Built-up Areas - *Moderate contribution*;
 - **Purpose 2:** To Prevent Neighbouring Towns Merging into One Another - *Moderate contribution*;
 - **Purpose 3:** To Assist in Safeguarding the Countryside from Encroachment - *Strong contribution*;
 - **Purpose 4:** To Preserve the Setting and Special Character of Historic Towns - *Weak/No contribution*.



- 4.13. At paragraph 5.22 of the Stage 1 Green Belt Assessment, the LPA summarises:

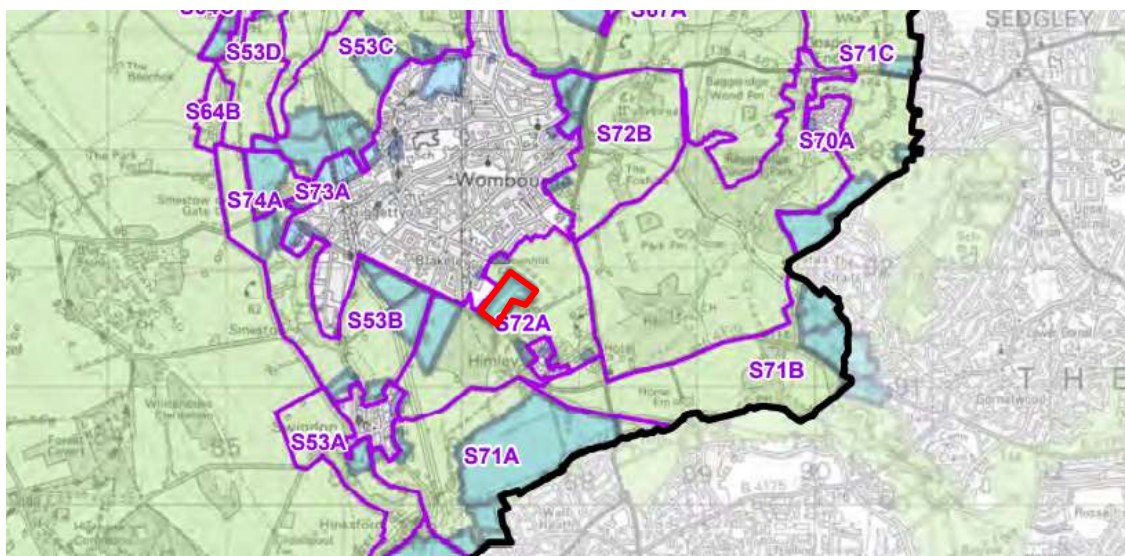
‘To the west of the conurbation, there is a smaller gap between Wolverhampton and Dudley to the east of Wombourne, where land makes a moderate contribution to the separation of Wolverhampton and Dudley. In addition, the land directly adjoining the two settlements forms part of the narrow gap between them, and makes a strong contribution to preserving their separation.’

- 4.14. The Stage 1 assessment area S72 totals over 260 Hectares, within which the site represents a very small elements of this land tract at less than 4% of this total area.

Stage 2 Assessment: Land Parcel S72A

- 4.15. In the Stage 2 assessment, the LPA divides the S72 land tract into smaller, more discrete land parcels, which in this instance, divides the Stage 1 assessment area into areas -S72A and S72B. The site forms part of a tract of land S72A referred to as the ‘Himley/Greenhill Plantations’ by the LPA.
- 4.16. S72A is the southern half of the wider land tract which is situated west of the A449. S72A equates to just over half of the Stage 1 assessment area at circa 150 Hecates which is managed mainly as equestrian and livestock pasture with a significant parcel of woodland (Himley Plantation); see Image 5.2:

Image 4.2: Extract from South Staffordshire Green Belt Review 2019, Part Two page 83. N.B. The approximate location and quantum of the site is illustrated with a solid red line with land tract S72A. S72B is located to the north of S72A



- 4.17. S72A includes the main vehicle route of the Stourbridge Road (A449) which then LPA have utilised as the physical feature to define the edge of the Stage 1 assessment parcel. The local minor route of the Bridgnorth Road (B4176) runs through this tract connecting the A449 with the village of Wombourne; see Image 4.3.
- 4.18. The B4176 is not utilised as a physical feature to define the boundary of the land tract; rather, the land is defined by the small village of Swindon (circa 1.3km west-south west of this position) and the Swindon Road (local minor route) to the north west (circa 1.1km of this position).
- 4.19. The southern edge of this land is defined by the adopted Development Boundary of Himley village (as per the adopted South Staffordshire Council Core Strategy (adopted December 2012) which remains engaged. However, the Himley Conservation Area is outside of this Stage 1 assessment area.



- 4.20. Consequently, the quantum of S72A is defined by long-established physical features including a number of urban edge features including settlement edges, extensive equestrian fields (some with timber stable buildings), Himley Cricket Club (accessed from the A449) and the Styche Lane Cemetery which bounds the site's north western boundary.
- 4.21. The area is also defined by a main vehicle route and minor routes, as well as less physical and permanent features defined by small woodland spinney blocks and field boundaries. The area contains open agricultural fields, Additionally, there are mature hedgerows, narrow equestrian fields enclosed by timber post and wire fences and the Himley Plantation (broadleaf woodland) through which a small number of recreational routes pass, including the South Staffordshire Railway Walk (promoted route) and a small number of permissive routes; see Image 4.3 and Appendix 1.
- 4.22. With consideration of our DEFRA Magic Map search the S72A does not contain any National or local landscape designations such as an Area of Outstanding Natural Beauty, National Park, Local Green Space or Significant Gap. However, the South Staffordshire Railway Walk (promoted route) is designated as a Local Nature Reserve and Himley Hall registered Park and Garden (Grade II) is situated east of the assessment area (across the A449); see Appendix 1.

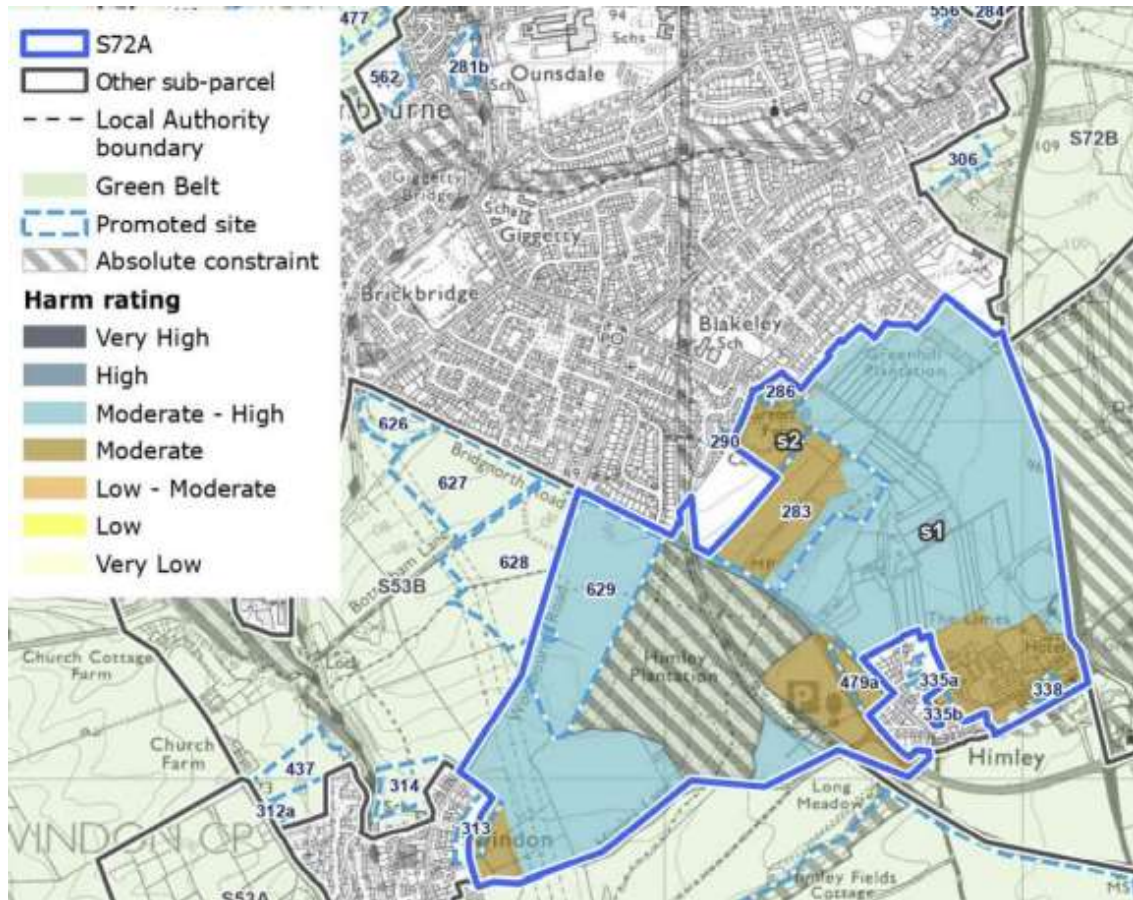
Image 4.3: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 749. Sub-parcel S72A which was appraised by the Local Planning Authority in the aforementioned Green Belt Review



- 4.23. The objective of this Stage 2 assessment is to identify the ‘potential harm’ of releasing land from the Green Belt. In their 2019 South Staffordshire Green Belt Study – Stage 1 and Stage 2, 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.
- 4.24. Stage 2 methodology (published by the LPA in the aforementioned 2019 Green Belt Study) is contained in Appendix 2 of the Position Paper. The LPA define the criterion of harm from Very Low to Very High.
- 4.25. Very Low harm is defined by the LPA as:
- ‘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’
- 4.26. Very High harm is defined by the LPA as follows:
- ‘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.’
- 4.27. As demonstrated by Image 4.4, through their Stage Assessment the LPA appraised the land within which the site is located as predominantly Moderate (harm) with the south eastern periphery being Moderate-High (harm). The site spans two sub-areas of S72A which the LPA refer to as S72As2 (the majority of the site adjoining the urban edge of Wombourne) and S72As1 which neighbours the foregoing and forms a small slither of land adjoining the existing mature woodland on the east of the site; see Image 4.4.
- 4.28. With consideration of the published Stage 2 assessment criterion, the LPA generally defines Moderate harm as follows: (N.B. The majority of the site area is situated within sub-area S72A-S1)
- ‘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.’
- 4.29. Moderate-High harm is generally defined by the LPA as follows: (N.B. A small section of the site areas is situated within sub-area S72As2):
- ‘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.’



Image 4.4: Extract from South Staffordshire Green Belt Review 2019, Part Two Appendix 3, page 752. Sub-parcel S72A was appraised by the Local Planning Authority in the aforementioned Green Belt Review. The harm criterion is listed by the LPA on the below extract



4.30. The LPA affords the following commentary for of S72A-S2 as follows:

‘The sub-parcel makes a strong contribution to preventing encroachment of the countryside, and a moderate contribution to preventing sprawl of the large built-up area and to maintaining the separation of Wombourne and the West Midlands conurbation. The sub-parcel is adjacent to the urban edge of Wombourne to the north and Swindon to the west. The village of Himley remains partially washed over to the south east of the sub-parcel. Release of smaller, more contained areas on the fringes of the three settlements would constitute negligible weakening of the adjacent Green Belt: Himley Plantation and a tree belt to the east of it provide containment to land adjacent to Wombourne and the former also contains land adjacent to Himley.’

4.31. The LPA summarises its findings for S72A-S2 as follows:

‘Release of land on inset settlement fringes that would not diminish gaps.’

4.32. For the area referred to as S72A-S1, the LPA raises similar commentary on the land’s ‘strong contribution to preventing encroachment of the countryside, and a moderate contribution to preventing sprawl of the large built-up area and to maintaining the separation of Wombourne and the West Midlands conurbation.’



- 4.33. The LPA also asserts that the 'loss of separation between these settlements would constitute a partial weakening of the integrity of the Green Belt in this area, and a weakening of the Green Belt boundary where Bridgnorth Road forms a distinct edge to the south of Wombourne.'
- 4.34. ZLA notes that S72A-S2 adjoins the existing urban edge and is enclosed (as noted by the LPA) by the extensive Himley Plantation and the woodland adjoining the site (within S72A-S1) which effectively create robust durable physical features to contain future development. This points is noted by the LPA within their summary of S72A-S2 (see para 4.30 above): *'Himley Plantation and a tree belt to the east of it provide containment to land adjacent to Wombourne and the former also contains land adjacent to Himley.'*

Stage 2 Assessment: Promoted Site 283

- 4.35. With reference to Image 4.4 above, a land parcel referred by the LPA as 283 is land previously promoted for new housing development. This land parcel totals 9.6 Hectares as was promoted in the South Staffordshire 'Call for Sites' process prior to the publication of the LPA's South Staffordshire Green Belt Review Stage 1 and Stage 2 in 2019.
- 4.36. The findings of the assessment of harm for S72A-S1 and S72A-S2 were overlaid with the identified boundaries of the promoted site 283. The quantum of the Promoted Site is situated predominantly within the land parcel S72A-S2 with a small slither along its eastern boundary within the adjoining S72A-S1.
- 4.37. Given their Stage 2 assessment, the LPA consider that the removal of Promoted Site 283 from the Green Belt would lead to Moderate harm (if not greater), and assert that this land parcel *'makes a strong contribution to preventing encroachment of the countryside, and a moderate contribution to preventing sprawl of the large built-up area and to maintaining the separation of Wombourne and the West Midlands conurbation.'*
- 4.38. In particular the eastern periphery of promoted Site 283 is important as its removal from the Green Belt would otherwise 'constitute a partial weakening of the integrity of the Green Belt in this area, and a weakening of the Green Belt boundary where Bridgnorth Road forms a distinct edge to the south of Wombourne.'



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.
- 5.2. With regard to Green Belt Purpose 4, which is '*To Preserve the Setting and Special Character of Historic Towns*'; 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. Registered Park and Garden or wider designed or non-designated heritage assets.
- 5.3. With regard to Green Belt Purpose 5, which is '*To assist in urban regeneration by encouraging the recycling of derelict and other urban land*'. ZLA concurs with the LPA, that the land parcel S72 (and by default the site) have no direct role given the location of the parcel away from areas requiring regeneration. The LPA do not include assessment for Green Belt purpose 5 in their 2019 assessment.
- 5.4. Consequently, the appraisal concentrates on the contribution which land parcels make to the first three Green Belt purposes:

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

- 5.5. 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.
- 5.6. 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

- 5.7. 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.
- 5.8. 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

- 5.9. 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.
- 5.10. This assessment is based on the key landscape characteristics of the site and its surroundings as well as the visual context, as described above.
- 5.11. 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.
- 5.12. 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.
- 5.13. 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.
- 5.14. 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. The site’s context is demonstrated on Image 5.1 and 5.2 overleaf. Image 5.1 illustrates the site’s red line relative to the newly completed Himley Meadows to the western edge of the site, as well as the existing site compound and access associated with the building. Image 5.2 is a retrospective aerial photograph from circa 2013 for comparison.



Image 5.1: Aerial photograph of the site area on the southern edge of Wombourne (source: Google Earth, dated circa 2021). N.B. The extent of the site is demarked by ZLA with a solid red line. To the west adjoining the site Bloor Homes Midlands are building and nearly completed 102 new homes



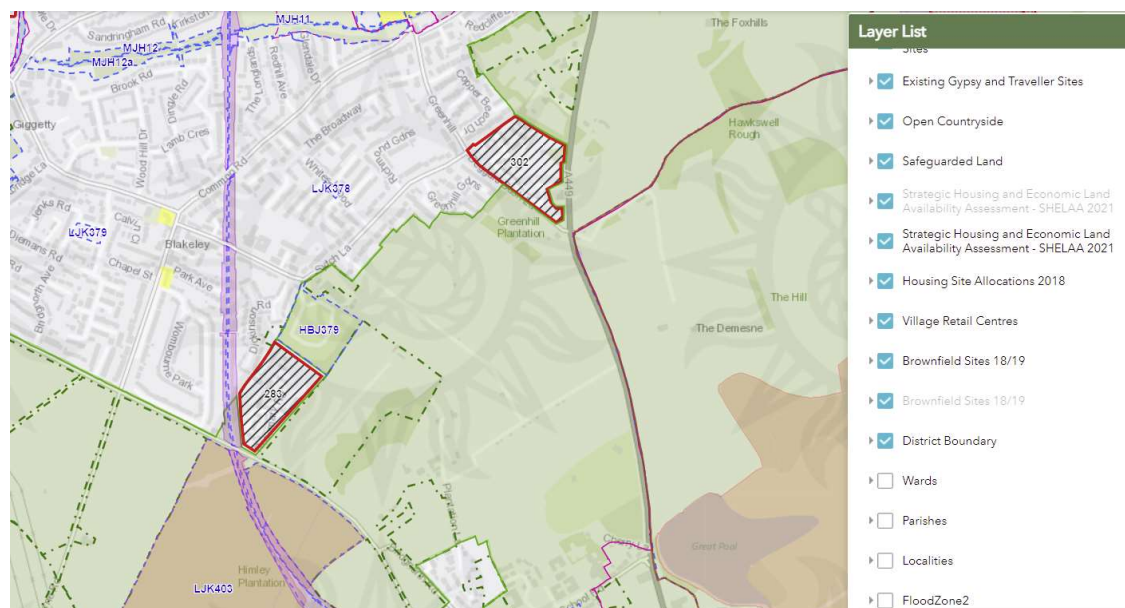
Image 5.2: Aerial photograph of the site area on the southern edge of Wombourne (source: Google Earth, dated circa 2013)



- 5.15. Himley Meadows was developed on a previous greenfield site on the southern settlement edge of Wombourne; see Image 5.2 above. The site for Himley meadows is situated outside, but adjoining the designated Green Belt; see Image 5.3. The site which is the subject of this Position Paper is situated within the designated Green belt adjoining Himley Meadows; see 5.3 overleaf.



Image 5.3: Extract taken from the on line Local Plan Map of the adopted South Staffordshire Local Plan (2012). N.B. The LPA have demarked the Green Belt with a solid green fill and the Allocated Housing Site (adjoining the site (Himley Meadows by Bloor Homes Midlands)) is shown with a solid red line. This extract was taken December 2021



- 5.16. Given the foregoing, it is appropriate to undertake a site specific Green Belt assessment of the site's (i.) contribution to Green Belt function, and (ii.) if the site be removed from the Green Belt what harm might that have on the function and integrity of the wider Green Belt.
- 5.17. 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 2021), it is possible to review the site in a wider sense 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.



- 5.18. 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. ZLA's site specific appraisal is contained within Tables 5.1-5.4 as follows:

Appraisal One: Green Belt Contribution

- 5.19. 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 (December 2021)

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 substantially enclosed along three of its boundaries. The eastern boundary is enclosed by an extensive woodland spinney of mature broadleaf woodland, beyond which there is extremely limited (if any intervisibility) with the outlying settlement of Himley to the south east. The southern boundary is enclosed by the Bridgnorth Road (B4176) which is extensively used and often busy with traffic. The Himley Plantation is opposite the site and runs south to west of the site along the B4176. This woodland is extensive at 24 Hectares.</p> <p>The north western site boundary is enclosed by rising landform, new residential development (Himley Meadows) with the extensive wooded route of the Smestow Valley Railway Walk. To the north the site is enclosed further by rising landform and the Stych Lane Cemetery. There is scope to see elements of the wider urban area of Wombourne to the north west and north including Dickinson Road and Beggars Bush Lane.</p> <p>The north eastern boundary adjoins narrow fields managed for equestrian livestock which lack any hedgerow and tree typical, with the fields enclosed by timber post and wire fencing which is untypical of the character of the surrounding landscape. Beyond this, the A449 roadway is discernible from within the site with an elevated landform and The Hill situated within the Himley Hall Registered Park and Garden.</p> <p>The site is situated sandwiched within these physical features and contained by urban features which contain the site from the wider countryside to the south and west of the site's location. These features sever the site's intervisibility and interconnectivity with the wider open countryside. When standing within the site it is quite evident (even in December) that there is no discernibility of open fields or outlying settlements. The site is experienced in combination with the existing urban edge of Wombourne (particularly the newly built Himley Meadows and the long-established dwellings on Beggars Bush Lane) and the urban edge land use of equestrian/'horsie-culture'.</p> <p>The site is overlooked by significant urban development and has an extremely limited sense of openness. The site is too contained by development, infrastructure and woodland to have any relationship with the wider countryside. Where there are open fields these have an urban edge feel and have few (if any) typical landscape characteristics. Consequently, the site has a stronger relationship with the neighboring urban area, with which it has a spatial equivalence.</p>	<p>Moderate Contribution</p>



NPPF Para 138 Green Belt Test	ZLA's Assessment for the site area	Grading
<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>There is sufficient physical and visual separation from the site to the outlying urban areas of Sedgley to the north east, Wall Heath and Kingswinford to the south and Swindon to the south west for the site to retain its own distinct landscape setting, aided by elevated land at Himley Hall/Baggeridge Country Park, the Himley Plantation and the generally wooded character on the southern edge of Wombourne.</p> <p>In sensory and perceptual terms, the neighboring urban built form (Himley Meadows, Dickinson Road and Barrs Bush Lane) are discernible across the site. The land parcel has a stronger relationship with the urban setting, with which it has a spatial equivalence. The development of the site would reduce the intervening gap between Wombourne and Himley village from circa 0.53km to 0.45km. However, the site is experienced as part of Wombourne and not within the open countryside between Wombourne and Himley village. The urban area of Wombourne is confined and limited by the extensive woodland spinney off the Bridgnorth Road, and so the expansion of the village would be perceived as not expanding beyond this feature which acts as a threshold or hinterland between the urban setting and the wider open countryside.</p> <p>Additionally, this expansion would be within the confines of the Bridgnorth Road (B4176) and not expand beyond this route which is typical of the south western edge of Wombourne.</p> <p>Consequently, the land is not located within a gap between Wombourne and Himley (rather on the outer edge of Wombourne) and the land plays a very limited role in maintaining the separation due to the presence of intervening woodland and the route of the Bridgnorth Road (B4176) which are significant separating features.</p>	<p>Weak/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 site. These features sever intervisibility and interconnectivity between the site and the countryside. Where there are open fields discernible from within the site, these fields are managed for equestrian livestock ('horseculture'). This land use has an urban edge context, and is experienced in combination with obvious residential development which overlooks these fields. These fields have limited, if any, typical characteristics of the host landscape area. A ridge line runs to the north east-east of the site which has remanent parkland tree planting. This landform prevents wider views of the open countryside from within the site.</p>	<p>Weak/No contribution</p>



NPPF Para 138 Green Belt Test	ZLA's Assessment for the site area	Grading
	<p>The long-standing settlement edge and residential curtilages of Wombourne are discernible from within the site's interior with direct and obvious views towards the recent development at Himley Meadows. The site contains very limited (if any) characteristics of open countryside as it was formerly managed for equestrian land use.</p> <p>The site contains a temporary management compound for building out Himley Meadows with portacabins, car parking, roadway and extensive soil storage. Other than that, there is a modest (timber) stables. There are significant elements of degraded and missing field hedgerows, limited scattered hedgerow trees and no woodland spinneys or blocks which are typical features of the host landscape character area. Through direct views of existing and new residential development and the enclosed site boundaries (east to west severing visibility with the wider open countryside) the site has a stronger relationship with Wombourne and is experienced within the built limits of the settlement rather than open countryside.</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>Weak/No 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 the existing settlement of Wombourne, the recently completed residential dwellings neighboring the site as well as the urban edge equestrian/'horsie-culture' land use.</p>	<p>Weak - 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 (December 2021)

Criteria	ZLA's Assessment for the site area	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 recently residential development (Himley Meadows) neighboring the site has expanded Wombourne southwards. This new development has gone beyond the extensive wooded Smestow Valley Railway Walk to fill in land between long-standing residential development (Dickinson Road), the Stych Lane Cemetery (opened in 2009) and the aforementioned Railway Walk. There is strong intervisibility of these existing urban features and built form from within the site. This discernibility extends through the site, especially the adjoining Himley Meadows. 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. This effect is experienced locally through the site and across the open equestrian fields north east to the A449 roadway. However, this effect is indiscernible around the wider boundaries of the site (especially east and west) due to the screening effect of the broadleaf woodland spinney and the extensive Himley Plantation, the route of the Bridgnorth Road (B4176) and the enclosed, extensively tree'd context of Stych lane Cemetery to the north-north east. These features are long-established, robust physical elements which would contain new development at the site, as well as affording an enhancement of the existing settlement edge to be more robust and durable for the long-term enhancing otherwise previously degraded landscape features. This would not weaken the integrity of the adjacent Green Belt. Consequently, ZLA concludes that the release of this land for development would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt as new development would be experienced inside the existing robust physical features rather than extending incongruously into the wider Green Belt.</p>	<p>Low 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 development of the site would reduce the intervening gap between Wombourne and Himley village from circa 0.53km to 0.45km. However, the site is experienced as part of Wombourne and not within the open countryside between Wombourne and Himley village. The urban area of Wombourne is confined and limited by the extensive woodland spinney off the Bridgnorth Road, and so the expansion of the village would be perceived as not expanding beyond this feature which acts as a threshold or hinterland between the urban setting and the wider open countryside.</p> <p>Consequently, ZLA concludes that the release of this land for development would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt as new development would be experienced inside the existing robust physical features rather than extending incongruously into the wider Green Belt.</p>	<p>Low - Moderate harm</p>



<p>Purpose 3:</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 site is sandwiched within durable physical features which enclose and sever connectivity and intervisibility with the wider open countryside. Consequently, rather than views to open countryside, there are direct and obvious views of the existing settlement of Wombourne and recently completed residential dwellings neighboring the site. The site is confined and limited by the Bridgnorth Road (B4176) which runs along the south western boundary. Development would be physically contained by this route and not extend outwards beyond it. The extensive Himley Plantation adds a further durable feature which contains the site and future development.</p> <p>Furthermore, the site was formerly managed for equestrian pasture. The site contains a modest timber built stable blocks to its north-north eastern edge. The site contains, few if any landscape features typical of the host landscape character area with an obvious lack of field hedgerows, scattered trees and small woodlands and spinneys which are common within the open countryside south of Woodbourne (and outside of the Himley hall Registered Park and Garden).</p> <p>Consequently, ZLA concludes that the land at the site makes a relatively weak contribution (if any at all) to the host landscape character area or the character of wider open countryside surrounding Wombourne. Therefore, its release would not weaken the Green Belt boundary or the integrity of adjacent Green Belt land.</p>	<p>Low harm</p>
<p>Overall Harm:</p>	<p>ZLA finds that the release of the site from the Green Belt would represent (at worst) less than 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 is seen from within the site are. Outside of the woodland spinney (to the east) and the extensive Himley Plantation (west), there is little, if any discernibility of this new residential area from within the wider Green Belt area.</p>	<p>Low harm</p>	



Appraisal Three: Landscape and Visual Context

- 5.20. 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>	<p>Overall, ZLA finds that the site is open in its nature with broad views across its quantum. However, there are no long-range views across broad, open countryside from within the site as it is enclosed and sandwiched by residential development, a cemetery, public roads and woodland all adjoining or neighboring the site with an elevated ridgeline to the north east beyond the A449 main vehicle route screen views. There are direct and obvious views from the site’s interior to the existing settlement edge of Wombourne and the neighboring new residential development north west of the site. Where views are open they are of equestrian land use with narrow fields enclosed by timber post and wire fencing. These fields contain very little, if any, typical landscape features and are not typical of the open countryside with forms the backdrop for Woodbourne. Overall, it is considered by ZLA that the site has a relative openness, but is predominantly contained by its boundaries which sever intervisibility and interconnectivity with the wider open countryside.</p>
<i>Physical Openness:</i>	<p>The site contains a temporary management compound for building out Himley Meadows with portacabins, car parking, roadway and extensive soil storage. Other than that, there is a modest (timber) stables. There are significant elements of degraded and missing field hedgerows, limited scattered hedgerow trees and no woodland spinneys or blocks which are typical features of the host landscape character area</p>
<i>What is the relationship between the nearest settlement and the surrounding Green Belt?</i>	<p>There is extensive Green Belt between Wombourne and outlying settlements to the north and west. To the east and south the Green Belt is narrower between Wombourne and Wall Heath (circa 1.6km south-south east), Kingswinford (circa 2.2km south east), Swindon (circa 1km south west-west) and Himley Village (circa 0.54km south east). From our field-based assessment (December 2021) there is no discernibility of the site from these settlements. This is due to the screening effect (or substantial filtering of views) by the physical features which enclose the site i.e., existing residential development, woodland spinney and woodland block (Himley Plantation).</p> <p>The site is situated inside the route of the Bridgnorth Road (B4176). This route runs along the south-south western edge of Wombourne, and residential development (within Wombourne) does not extend beyond this route.</p>



<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. There are no Public Rights of Way which pass along or around the site's boundary; see Appendix 1.
<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 within the site and its immediate context which can be seen from the site area?</i>	Very limited intactness (if any at all). There are significant elements of degraded and missing field hedgerows and limited scattered hedgerow trees (typical feature of the host landscape character area). The neighboring equestrian fields are enclosed by timber post and wire fencing to form long and narrow fields (incongruous to the local field pattern of the host landscape character area). Apart from the hedgerow line along the B4176, neither the site, or the neighboring equestrian fields contain hedgerows or woodland blocks which are key features of the host landscape character.



Appraisal Four: Boundary Resilience

- 5.21. 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 to deliver a well-rounded and robust opinion of the site's release from the Green Belt.
- 5.22. Paragraph 142 states the following:
- 'When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of developments...They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'
- 5.23. 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.'
- 5.24. With regard to the revised NPPF paragraph 143, it is recognised that there are benefits in defining boundaries by '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.
- 5.25. 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 and far better integration of a settlement edge within its setting via the combination of these robust features, and deliberately design landscape mitigation to compliment further, restore and enhance the landscape character of the surrounding environment.
- 5.26. 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.
- 5.27. 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 Part One and Part Two (2019); see Table 5.4 overleaf:



Table 5.4: ZLA's Assessment of boundary resilience (December 2021)

Evaluation Question	ZLA comments for the site area
<p><i>Significance and permanence of boundaries:</i></p>	<p>The site is sandwiched between extensive woodland block and spinney features. These features define the southern periphery of Wombourne including the Smestow Valley Railway Walk, Himley Plantation and the broadleaf spinney adjoining the site. This woodland is mature and long-established, limiting the intervisibility with the open countryside outside of the village.</p> <p>Inside of this, the site is enclosed further by the route of the Bridgnorth Road (B4176) as well as the extensive residential built form and the Stych Lane cemetery. However, these features are not enclosed by a similar woodland block or spinney similar to that typically experienced around the southern edge of the village. The existing edge of the Himley Meadows scheme is experienced as quite raw (lacking robustness) and the cemetery enclosed by a curtilage of tree components rather than a broadleaf woodland feature, which is less robust.</p> <p>These neighboring land uses are typically urban in character rather than agricultural or quasi-agricultural, and when on site, especially in winter, one is aware of the presence of these surrounding village related uses, albeit on the edge of the village, rather than feeling divorced from it, in the open countryside. Beyond this within the wider Green Belt, the discernibility of the existing urban edge is limited and enclosed by the surrounding woodland blocks and spinneys. Consequently, from a landscape and village character perspective, the site is experienced within these robust durable features that is influenced by the urban edge of Wombourne, which is loose and relative open at this point when seen from within the site.</p> <p>The combination of mature woodland blocks, spinney and roadways are robust and durable features which are long-established. 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 residential development (Himley Meadows) is experienced as incongruous and raw from with the site area (i.e., within the Green Belt).</p>



6. CONSIDERATION OF THE COUNCIL'S SUSTAINABILITY APPRAISAL (AUGUST 2021)

- 6.1. South Staffordshire Council's Sustainability Appraisal of the South Staffordshire Local Plan Review has been prepared to provide an appraisal of each option (called Reasonable Alternatives in Sustainability Appraisal terms) in the Preferred Options Plan to identify their likely sustainability impacts on each objective of the Framework.
- 6.2. South Staffordshire District Council (SSDC) is in the process of writing the South Staffordshire Local Plan Review (LPR). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the Local Plan making process by identifying the likely environmental effects of reasonable alternatives and various options.
- 6.3. The methodology used a number of broad planning subjects, one of which was 'Landscape and Townscape' which assessed a number of pertinent subjects against a score criterion. The LPA stated:
- 'Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.'*
- 6.4. These subjects included: (Vicinity and likely effects on) Cannock Chase AONB - Green Belt Boundary Review – Landscape Sensitivity – (distance to) Country Parks – (availability and sensitivity of) Views. See Image 6.1 overleaf for an extract of Table 2.3 of the aforementioned Sustainability Assessment which defines the scoring criterion.



Image 6.1: Extract from South Staffordshire Council’s Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report August 2021, Table 2.3

Table 2.3: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; Cause a very high-quality receptor to be permanently diminished; Be unable to be entirely mitigated; Be discordant with the existing setting; and/or Contribute to a cumulative significant effect.
Minor Negative -	<p>The size, nature and location of development proposals would be likely to:</p> <ul style="list-style-type: none"> Not quite fit into the existing location or with existing receptor qualities; and/or Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> Improve undesignated yet recognised receptor qualities at the local scale; Fit into, or with, the existing location and existing receptor qualities; and/or Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; Restore valued receptors which were degraded through previous uses; and/or Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

6.5. In this assessment, the site continues to be identified as ‘283’. At page 674, the LPA conclude this ‘headline’ assessment under the sub-heading of ‘Key Positives and Negatives’ that the site had ‘*major native impacts predicted against the landscape criteria*’. This conclusion is supported by the LPA at pages 409 onwards of the Sustainability Assessment, for which I summarise below:

- Green Belt Harm: ‘*Development of.....283.....could cause ‘moderate-high’ levels of harm to the purposes of the Green Belt. Therefore, development.....is assessed as having a potentially major negative impact.*’



- Landscape Sensitivity: *'Site 283.....within an area of 'low/moderate' landscape sensitivity. Development (has) been assessed as having a potentially minor negative impact.'*
- Landscape Character: *'Site 283..... the proposed residential development.....could potentially be discordant with the key characteristics of the associated LCTs. Therefore, a minor negative impact on the local landscape character would be expected.'*
- Views from the PRoW Network: N.B. ZLA notes that the site is not referred to by the LPA in this matter. We assume that there would be no discernible impact on the visual amenity of PRoW users, so, ZLA record this as imperceptible/indiscernible effect, or neutral.
- Views for Local Residents: *'The proposed development at Site 283.....could potentially alter the views experienced by local residents, including those on Pool House Road, Wood Road and Bridgnorth Road. Therefore, a minor negative impact on the local landscape would be expected.'*
- Urbanisation of the Countryside: *'Site 283..... the proposed development.....would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.'*

6.6. Given the foregoing, the LPA consider that the site ('283') has the potential for major negative impacts due to the site's location within the Green Belt, albeit on the periphery of the Green Belt designation adjoining (and overlooked by) the existing urban edge of Wombourne.

6.7. However, all other landscape planning considerations assessed were deemed to of minor negative impact. Consequently, the LPA considers the development of the site for residential development would have only minor negative impact on local landscape character, minor negative impact on the visual amenity of local residents, minor negative impact on the surrounding countryside, and no recorded effect on the visual amenity of PRoW users within the wider open countryside surrounding Wombourne.

6.8. To an extent, this Sustainability Appraisal is reliant on previously assembled assessment information, one of which is the 2019 'South Staffordshire Green Belt Study Stage 1 and 2 Report'. This assessment was undertaken prior to the building our of Himley Meadows, and in the case of this particular site, is out of date, due to the change in the existing urban edge.

6.9. From the undertaking this site specific Green Belt review in December 2021, we conclude that the LPA must only consider there would be potential major negative effects on the spatial openness of the Green Belt. However, the LPA consider that the development of the site would at worst lead to minor effects to the landscape character, open countryside and visual amenity for local residents) and it is assumed have no effect on the visual amenity of PRoW users.

6.10. The release of this land from the Green Belt for new residential development would have an effect on spatial openness. However, it is unlikely such a development would have a harmful effect on the visual openness of the Green Belt (visual amenity) or the landscape character of the site or the surrounding countryside. Whilst the change to the site's fabric and character would be discernible locally, it is considered that the eventual development will have no, or no additional, effect on the Green Belt, in terms of visual amenity and landscape character.

6.11. Given our analysis of this Sustainability Appraisal, ZLA considers that the Local Planning Authority's assertion that the likely scheme at the site would lead to *'major negative implications'* is flawed in the manner in which conflates spatial openness and visual openness.



- 6.12. The LPA's conclusion appears to be based on their judgement that the development of the site would result in major, adverse impacts to the Green Belt. This level of effect would be significant. However, the development of the site would only result in minor, adverse effects (at worst) on visual amenity and landscape character.
- 6.13. Spatially, the release of the site for development would result in a reduction in existing spatial openness simply by a dint in the Green Belt area. However, visually, the effect of the development is likely to be shaped by a more complex combination of factors.
- 6.14. The Local Planning Authority evidently only considers the physical reduction in Green Belt land, and fails to recognise the visual openness in its judgement. If this is not the case, then the Local Planning Authority would not appraise Green Belt harm as potentially a major negative impact through development when its considers the scheme to lead to only minor effects on then visual amenity of local residents and fails to register any negative concerns or comments on the likely effects of development on the visual amenity of PRow users. These are indices of how the scheme would impact visual openness.
- 6.15. Consequently, we agree with the Local Planning Authority that development of the site would only lead to minor adverse effects (at worst) on landscape character (surrounding the site) and visual amenity of local residents and users of PRow. However, ZLA considers that the release of the site from the Green Belt for development would not lead to major negative implications, and whilst there would be impacts to the Green Belt, the reduction in spatial openness would not be significantly harmful as asserted by the Local Planning Authority.



7. SUMMARY

- 7.1. 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.
- 7.2. The site was appraised as part of the wider tract of land S72, which totals 260 Hectares. The site represents circa 4% of this area. The LPA found that this land parcel area performed No to Strong contribution, asserting Moderate contribution for Green Belt role 1 and 2 i.e. checking unrestricted sprawl and preventing towns from merging. For the third Green Belt role, the LPA considered this extensive tract of land had a Strong contribution to Green Belt role 3 for safeguarding the countryside from encroachment.
- 7.3. Additionally at Part Two of the LPA's Green Belt Review (2019), the LPA considers that the release of land along the south east to south western periphery and open countryside surrounding Wombourne (S72A(s1 and s2)) would harm the integrity of the wider Green Belt to a Moderate level (at worst Moderate-High).
- 7.4. The majority of the site area is situated within the land parcel (S72As2). The LPA considered the release of this whole land parcel would have a Moderate harm to the function and integrity of the wider Green Belt. However, since undertaking their 2019 assessment, the site now adjoins the settlement edge of Wombourne.
- 7.5. In sensory and perceptual terms, the neighbouring urban built form (Himley Meadows, Dickinson Road and Barrs Bush Lane) are discernible across the site. Through the development of the Himley Meadows scheme, the site is interconnected and intervisible with the wider urban area which it neighbours.
- 7.6. Therefore, this part of the wider S72A land parcel has a stronger relationship with the urban setting, with which it has a spatial equivalence. The LPA concluded in 2019 assessment, that the 'release of land on inset settlement fringes that would not diminish gaps'. The LPA also state:
- 'Release of smaller, more contained areas on the fringes.....would constitute negligible weakening of the adjacent Green Belt.'
- 7.7. Given the foregoing, ZLA are minded agreeing with the LPA in this regard. Our field-based assessment was undertaken more recently, and we found that the site is sandwiched between extensive woodland block and spinney features, which contains the site. In combination with the Bridgnorth Road (B4176) provides extensive durable features which sever the intervisibility and interconnectivity with the wider Green belt. This point is also reflected on by the LPA, which states:
- 'Himley Plantation and a tree belt to the east of it provide containment to land adjacent to Wombourne and the former also contains land adjacent to Himley.'
- 7.8. The site's 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. These physical feature are long-standing, robust and durable in nature and extent.
- 7.9. Consequently, the Green Belt could be re-aligned to these features and afford a more robust and consistent Green Belt. This would give a distinction between urban and open countryside and the site's release would constitute a 'negligible weakening of the adjacent Green Belt.'



- 7.10. The majority of the wider S72As1 and S72As2 is located away from the main settlement (Wombourne) extending across open fields between outlying settlements (Himley Village) and Swindon to the west of the Bridgnorth Road (B4167). Similarly, the Himley Plantation is situated within land parcel S72As21 within open countryside outside of Wombourne and beyond the Bridgnorth Road (B4176). The LPA consider this wider land parcel to represent a potential Moderate-High harm to the function and integrity of the Green Belt if removed.
- 7.11. Similarly to the east, land parcel S72As1 extends across open, almost feature-less equestrian fields with little intact landscape character. There is a relative openness to views which are broad across this area of the land parcel. The LPA consider this wider land parcel to represent a potential Moderate-High harm to the function and integrity
- 7.12. The site area includes a very small area of this land parcel (S72As1). Like S72As2, the majority this site area is located inside the adjoining woodland spinney which encloses the site area, severing interconnectivity and intervisibility with the wider Green Belt. The LPA's assessment of this section of the wider land parcel (S72As1) also predates ZLA's 2021 December 2021 field survey.
- 7.13. Similarly to the wider site area, this land has a stronger relationship with the urban setting, with which it has a spatial equivalence. For the effective release of this area of the site from the Green Belt, there would be a necessary strengthening of durable, robust features along this north eastern section. The extension of the woodland spinney to enclose this section would lessen the harm to the wider Green Belt through its release and form a distinct edge to the south of Wombourne.
- 7.14. The above assessment provides an independent review of the site in respect of the 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 S72 and its sub-parcels, this site specific appraisal has enabled a better understanding of the site's Green Belt function; see Table 7.1:

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

Purpose	South Staffordshire Green Belt Review for S72 (2019) (circa 260 Hectares)	ZLA's Site Specific Appraisal (2021) (circa 10 Hectares)
<u>GB Purpose 1:</u> <i>To check the unrestricted sprawl of large built-up areas</i>	Moderate Contribution	Moderate contribution
<u>GB Purpose 2:</u> <i>To prevent neighboring towns from merging into one another</i>	Moderate Contribution	Weak/No contribution
<u>GB Purpose 3:</u> <i>To assist in safeguarding the countryside from encroachment</i>	Strong Contribution	Weak/No contribution
<u>GB Purpose 4:</u> <i>To preserve the setting and special character of historic towns</i>	Weak/No Contribution	Weak/No contribution



7.15. 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 7.2:

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

Purpose	South Staffordshire Green Belt Review for S72As1 (2019) (circa 90 Hectares)	South Staffordshire Green Belt Review for S72As2 (2019) (circa 30 Hectares)	ZLA's Site Specific Appraisal (2021) (circa 10 Hectares)
<i>Release of land from the Green Belt</i>	Moderate-High harm	Moderate harm	Low harm

7.16. ZLA considers the S72 land tract, and the sub-parcels, are too large and expansive for an assessment which accurately assess such a relatively small land parcel under consideration in this Position Paper. This is an example of the land parcel being insufficiently fine grain to make an accurate assessment, and instead rely on a broad-brush appraisal across a much larger land area with very different landscape character, openness and urban influences across its quantum.

7.17. Furthermore, the site-specific assessment in this Position Paper is current based on observations from December 2021. In this situation, the South Staffordshire Green Belt Study Stage 1 and 2 Report is out of date relative to this site as it was undertaken prior to the development of Himley Meadows.

7.18. The site for Himley Meadows is situated outside, but adjoining the designated Green Belt. This recent residential development neighbouring the site has expanded Wombourne southwards. This new development has gone beyond the extensive wooded Smestow Valley Railway Walk to fill in land between long-standing residential development (Dickinson Road), the Stych Lane Cemetery (opened in 2009) and the aforementioned Railway Walk. There is strong intervisibility of these existing urban features and built form from within the site.



8. CONCLUSION

- 8.1. Zebra Landscape Architects ('ZLA') has been commissioned by Bloor Homes Midlands (the 'Promotor') to prepare this Green Belt Position Paper. This document appraises the Green Belt function of land north east of Bridgnorth Road, Wombourne, South Staffordshire (the 'site').
- 8.2. This Position Paper provides an independent technical evidence base to support the site's 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 winter during December 2021.
- 8.3. NPPF paragraph 142 states:

'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.'
- 8.4. The development of the site affords the opportunity to provide public open space for amenity with permissive access for residents of the scheme, and the wider residents of the village. Additionally, the landscape of the site would enable ecological betterment and bio-diversity net gain through habitat creation, formal and informal landscaping.
- 8.5. The landscape management guidelines for the host LCT in the published assessment are to 'maintain the tree cover', 'encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character', 'conserve and restore tree cover' and 'seek opportunities to enhance tree cover'.
- 8.6. Consequently, the scheme could also afford the opportunity to retain, protect and enhance the existing woodland spinney adjoining the site, as well reinstate lost and degraded hedgerows in the site area (where practicable) as well as the rejuvenation of the site's northern boundary. These feature create ecological linkages for habitat creation and bio-diversity net gain, as well as retain and enhance the existing landscape character surrounding Wombourne. N.B. Further details are provided at Section 4 of ZLA's landscape Position Paper (ref: ZLA_1242_Landscape) which supports the promotion of the Site.
- 8.7. The Framework defines one of the essential characteristics of the Green Belt to be its openness. There is no formal definition of openness but, in the context of the Green Belt, it is generally held to refer to an absence of development. Openness has both a spatial (physical) dimension, and a visual aspect.
- 8.8. The question of visual qualities is implicitly part of the concept of openness of the green belt as a matter of natural meaning of the language used in para 138 of the NPPF. This interpretation is also reinforced by the general guidance in NPPF paragraph 143-145, which introduce Section 13 on the protection of the Green Belt Land.
- 8.9. There is an important visual dimension to checking '*the unrestricted sprawl of large built-up areas*' and the merging of neighbouring towns, as indeed the name Green Belt itself implies. Greenness is a visual quality; part of the idea of the Green Belt is to relieve the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside and '*safeguarding the countryside from encroachment*' includes preservation of that quality of openness.
- 8.10. Again, 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.



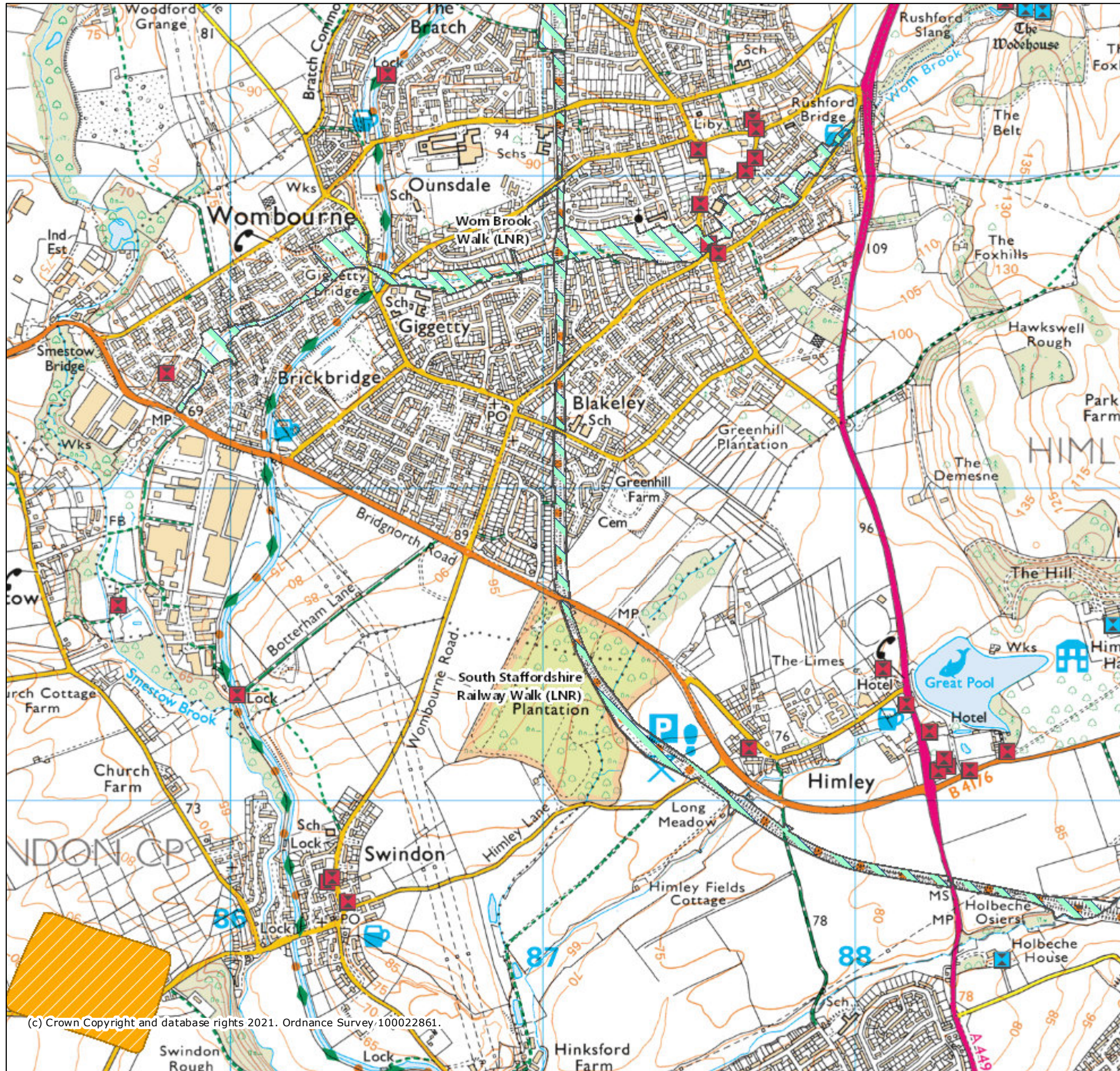
- 8.11. Spatially, the release of the site for development would result in a reduction in existing spatial openness simply by a dint in the Green Belt area. However, visually, the effect of the development is likely to be shaped by a more complex combination of factors. The visual loss of openness would be very localised and confined mainly to the immediate surroundings of the site.
- 8.12. In their 2021 South Staffordshire Council's Sustainability Appraisal of the South Staffordshire Local Plan Review, the Local Planning Authority also consider the release of the site are for residential development would only result in minor negative impact on local landscape character and the surrounding open countryside, as well as minor impacts (or less) on the visual amenity of local residents and PRoW users crossing the wider open countryside surrounding Wombourne.
- 8.13. Consequently, would the release of the land for proposed change of use 'preserve' the openness of the Green Belt – this cannot mean that a proposal can only be regarded as 'not inappropriate in Green Belt' if the openness of the Green Belt would be left entirely unchanged.
- 8.14. It can only sensibly mean that the effects on openness must not be harmful – understanding the verb 'preserve' in the sense of 'keep ... safe from harm' – rather than 'maintain (a state of things)' (Oxford English Dictionary (Sept 2021 edition)). The release of this land from the Green Belt for the proposed development is likely to be largely imperceptible.
- 8.15. The change to the site's fabric and character would be discernible locally, albeit from a very limited number of vantage points. The resulting level of effect is moderate-minor to minor, adverse. These effects are very localised and confined mainly to the immediate surroundings of the site.
- 8.16. The likely landscape mitigation and enhancement planting, habitat creation and Public Open Space (likely to accompany such a residential development as being promoted would not be 'visually open', but it would be erroneous and illogical to conclude that harm to the landscape openness of the Green Belt would accrue as a result.
- 8.17. Were that the case, the existing dense woodland cover to the south-south west and mature woodland spinney adjoining the site would 'harm' the openness of the Green Belt. Consequently, the landscape management guidelines for the host LCT in the published assessment to 'maintain the tree cover', and 'encourage the planting of new woodlands' would also conflict with Green Belt policy. That is clearly not reasonable or logical; therefore, the broad thrust of, function and purpose of the Green Belt in this location would remain not be significantly harmed.
- 8.18. Given the foregoing appraisal, ZLA considers that the feasibility of this site as a candidate for Green Belt release is strong. There is direct intervisibility of the existing urban features and built form along the settlement edge of Wombourne. The discernibility of these features extend through the site, but are limited by the existing robust woodland spinney (to the east) and Himley Plantation (to the south), which would also have a beneficial effect on any future development through reducing and offsetting views. Additionally, it is envisaged any future development scenario would protect and enhance these features through new planting as part of the overall development proposals.
- 8.19. From undertaking this site specific assessment, ZLA considers that the release of land north east of Bridgnorth Road would be sustainable and unlikely to lead harmful impacts to the openness of the Greenbelt.



APPENDIX 1:

EXTRACT FROM DEFRA MAGIC MAP





Legend

- National Trails (England)
- ★ Doorstep Greens (England) - points
- ★ Millennium Greens (England) - points
- Country Parks (England)
- Registered Common Land (England)
- Areas of Outstanding Natural Beauty (England)
- Local Nature Reserves (England)
- National Nature Reserves (England)
- National Parks (England)
- Scheduled Monuments (England)
- World Heritage Sites (England)**
- Buffer Zone
- World Heritage Site
- Listed Buildings (England)**
- I
- II
- II*
- Registered Battlefields (England)
- National Forest (England)

Projection = OSGB36
 xmin = 384300
 ymin = 290500
 xmax = 389800
 ymax = 293200

Map produced by MAGIC on 2 December, 2021.
 Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

APPENDIX 2:

**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 inset⁴³ villages. If any significant areas of washed-over⁴⁴ urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside (as described in **Paragraph 4.3** above), the analysis:
- assessed the strength of relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features;
 - identified changes in the strength of relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features; and
 - considered how these spatial relationships affect contribution to each of the Green Belt purposes, and mapped lines to mark these changes.
- 4.6 The analysis progressed outwards from each settlement until it was determined that land:
- ceases to play a significant role in preventing sprawl of a large built-up area;
 - either makes a consistent contribution to settlement separation, or makes no contribution to this purpose;
 - is strongly distinct from urban settlement and has a strong relationship with the wider countryside; and
 - makes no contribution to the setting or special character of a historic town.

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

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

Criteria for Assessment of Green Belt Contribution

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

Table 4.1: Green Belt Contribution Ratings

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

Purpose 1 Assessment Criteria

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

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

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

Table 4.2: Purpose 1 assessment criteria

Purpose 1: Check the unrestricted sprawl of large built-up areas	
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.	
Strong Contribution	Land adjacent or close to the large built-up area that contains no or very limited urban development and has strong openness. It retains a relatively strong relationship with the wider countryside.
Moderate Contribution	Land adjacent or close to the large built-up area that contains some urban development and/or is to an extent contained by urban development, but retains openness and some relationship with the wider countryside.
Weak/No Contribution	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

Purpose 2: Prevent neighbouring towns from merging	
<p>Development/land-use: less developed land will make a stronger contribution – a ‘gap’ which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.</p> <p>Location: land juxtaposed between towns makes a stronger contribution.</p> <p>Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.</p> <p>Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.</p> <p>Connecting features: where physical features strengthen the relationship between towns, e.g. where they are directly linked by a major road or have a strong visual connection, or where smaller urban settlements lie in between, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.</p>	
Strong Contribution	Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them.
Moderate Contribution	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.
Weak/No Contribution	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

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

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

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

Purpose 4 assessment criteria

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

Table 4.5: Purpose 4 assessment criteria

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

Purpose 5 assessment criteria

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

Stage 1 Strategic Assessment Outputs

Analysis of variations in contribution to Green Belt purposes

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

Part C: Stage 2 Methodology and Findings



6 Stage 2 Methodology

Introduction

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

Identification of assessment areas for Stage 2 assessment

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

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

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

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

Links between Stage 1 and Stage 2 assessment

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

Stage 2 Assessment Process

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

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

Criteria for Assessment of Harm resulting from Green Belt Release

Step 1: Consider contribution ratings in more depth

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

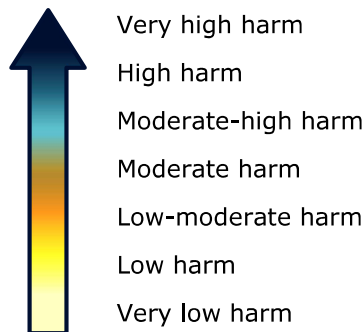
Step 2: Assess potential impact of release on the integrity of the remaining Green Belt

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

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

Step 3: Assess overall Green Belt harm

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

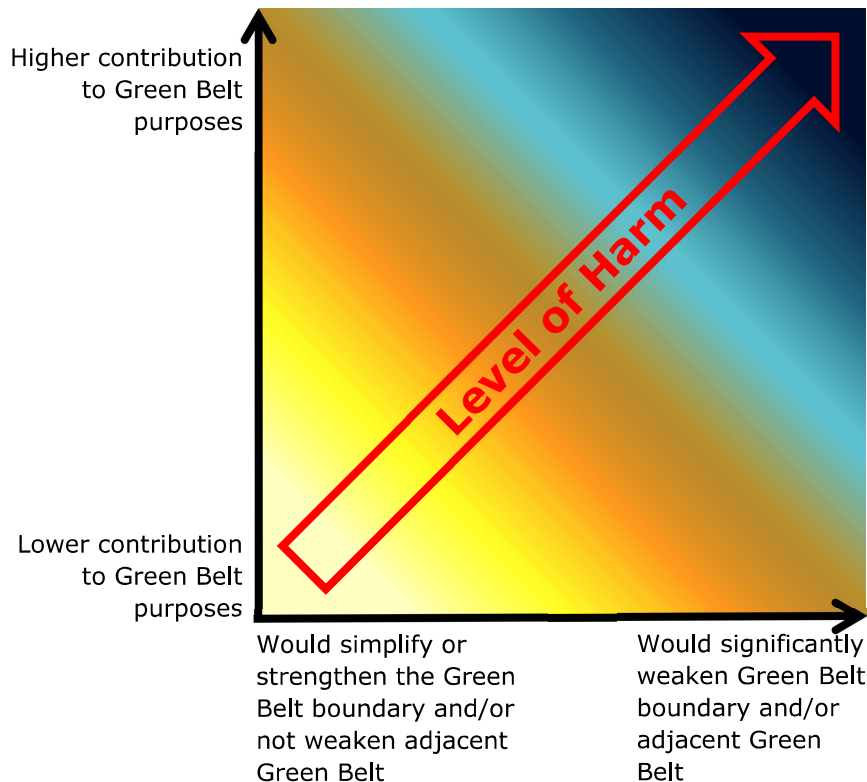


6.23 **Figure 6.1** provides an indication as to how the contribution to the Green Belt and the impact on adjacent Green Belt and the strength of the boundary influence the overall harm of Green Belt release. However, **professional judgement** was required in each individual case to consider how much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

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

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

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



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

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

Stage 2 Assessment Outputs

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

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

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

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

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

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