



South Staffordshire Local Plan Review

Preferred Options Representations submitted on behalf of Boningale Homes Ltd Land off Heath House Lane, Codsall

December 2021

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Introduction

- 1.1 Alder King Planning Consultants is submitting these representations on the Local Plan Review Preferred Options consultation November-December 2021 on behalf of its client, Boningale Homes Ltd.
- 1.2 Boningale Homes Ltd owns land off Heath House Lane at Codsall as delineated on the plan at **Appendix 1** and has previously submitted the requisite information to the Council's Call for Sites exercise in 2017 and made follow up representations to the Council's Spatial Housing Strategy and Infrastructure Delivery consultation in 2019.
- 1.3 These representations are written in response to the consultation questions raised within the Preferred Options document in the context of the site at land off Heath House Lane being promoted through the Local Plan Review and the capacity the site is considered to have to provide sustainable, high quality, residential development.
- 1.4 The site at land off Heath House Lane, Codsall is identified as site no 515 within the Sustainability Appraisal of the South Staffordshire Local Plan Review, Preferred Options Plan, Regulation 18(III) SA Report, August 2021.

Site Location and Context

- 1.5 The extent of Boningale Homes' land ownership of land off Heath House Lane is shown at **Appendix 1**. The plan below shows the site (in red) in the context of surrounding approved and emerging development.



- 1.6 The site borders the settlement of Codsall to the south and is located adjacent to the site identified by the blue line at land at Keepers Lane and Wergs Hall Road which is proposed by the Council to be allocated for at least 317 no. dwellings under policy SA5: Housing Allocations (site ref no: 419a&b).
- 1.7 The site identified by the grey line was granted reserved matters approval by the Council on 6 May 2021 for development of 65 no. dwellings (LPA ref: 21/00068/REM) pursuant to Outline Planning Permission 19/00113/OUT, granted 2 April 2020.
- 1.8 The above plan illustrates the emerging development on neighbouring land to Land off Heath House Lane, in addition to the existing Codsall & Wergs Garden Centre located to the south east. It is considered that the Council should support a residential housing allocation on Land off Heath House Lane within the Local Plan Review in the context of the existing and emerging built context here to the south of Codsall. This would provide a logical continuation of built form to the south of Codsall with the site allowing a sensible extension of Codsall southwards without being visually or spatially dominant on the landscape.
- 1.9 Development on this site would be in accordance with the aims of proposed Policy DS3 with regard to the Council's spatial strategy to 2038 in distributing growth to the district's most sustainable locations. Codsall is classified as a tier 1 settlement which can easily accommodate further growth. This is acknowledged by the Council with its proposed allocations at the settlement. Further to these, it is considered that the allocation of land off Heath House Lane for residential development would be suitable to continue the built form extension to the south of Codsall. The site is benefitted by good transport links to the south and strong transport links within walking distance.
- 1.10 It is considered that removal of this parcel of land from the Green Belt is acceptable. In the context of the existing and emerging built form and the limited contribution the site makes to the Green Belt, it is considered that such removal would not demonstrably impact the overall purpose of the wider Green Belt as a whole nor the setting of Codsall. A landscape and visual review of Green Belt purposes for land off Heath House Lane has been prepared by The Landmark Practice in support of these representations. This Green Belt review can be found at **Appendix 2** and should be read in full alongside these representations. Overall, this site specific review finds that land off Heath House Lane makes a limited contribution to Green Belt Purposes, at a local level, on the southern edge of Codsall and that this contribution would reduce further with development of the Council's identified draft allocation site to the east at land off Keepers Lane (419a&b).
- 1.11 The land off Heath House Lane could deliver between 80-90 no. dwellings including the retention of existing treed landscaping buffer in the south east with dual access available off Heath House Lane to the west and Wergs Hall Road to the east. This treed area would be retained to provide screening and for use as public open space, further to new landscaping buffers that would be provided across the site enabling an entrance to the countryside and reducing the visual impact on the approach to Codsall. In this regard, figure 1 of the landscape and visual Green Belt review at **Appendix 2** indicates potential mitigation to further limit any harm in development of land off Heath House Lane and also includes opportunities for beneficial uses of Green Belt to accompany the release of the site from the Green Belt.

- 1.12 This land owned by Boningale Homes is available now, deliverable, viable and subject to support from the Council, would be delivered within 1-2 years of Local Plan adoption to support the district's housing need. Boningale Homes are committed to providing a policy compliant scheme that would provide for much needed new homes in the early years of the new local plan period. This is considered to be a major positive of the site which contains no barriers to development such as reliance on third party land. The site would benefit from two access points to the east and west.

Local Plan Review – Preferred Options

Question 3: a) Have the correct vision and strategic objectives been identified? b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?

- 2.1 The SWOT analysis conducted by the Council and provided in Table 2 of the Preferred Options document acknowledges the increasing pressure for development on land within the Green Belt to meet the housing needs of the Council and that of adjoining areas.
- 2.2 Moreover, 'Table 3: Homes & Communities – issues and challenges outlines through its duty to cooperate, that the Council needs to consider the provision of additional homes to meet the needs of the wider Greater Birmingham Housing Market Area (GMBHA) to deliver a quantum of housing above and beyond the Council's own objectively assessed housing need of 243 dwellings per annum.
- 2.3 In this regard, the Council's Strategic Housing Market Assessment (SHMA) 2021 identifies that a total of 9,068 new dwellings will be delivered in South Staffordshire over the twenty year plan period, including 4,000 new homes within the district to help meet the unmet housing need arising in the GMBHA.
- 2.4 Alder King agrees with the Council's vision and strategic objectives to "*protect the Green Belt and Open Countryside as far as possible*" (underlined for emphasis) and planning for sufficient housing to contribute to the unmet needs of the GBHMA in addition to meeting the housing needs of the district.
- 2.5 Alder King considers, owing to the scale of the identified uplift in housing need, there to be further opportunity at this stage of the Local Plan Review to reconsider some sites discounted for allocation to support this increase in housing demand. Particularly, land off Heath House Lane (Appendix 1), Codsall represents a prime location where residential development could be supported, commensurate with the Tier 1 settlement status of Codsall/Bilbrook and the Council's vision for commensurate residential development on adjoining land over the plan period (see responses to questions 4, 5, 7 & 8 below).

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

- 2.6 The character of South Staffordshire is influenced by the scale of open countryside across the district and that circa 80% of the district is Green Belt. Notwithstanding this, the Council is duty bound by national planning policy to deliver a sustainable growth strategy to meet the district's development needs for new housing, in addition to contributing to the unmet needs of the GBHMA. This has led to the Council releasing Green Belt land and safeguarding sites for development and Alder King consider it to be appropriate to further identify sites such as land off Heath House Lane, Codsall that could acceptably support the Local Plan housing requirement and acceptably be removed from the Green Belt for this purpose (see also response to question 8 below). While Alder King consider the land off Heath House Lane should be included as a housing allocation within the current Local Plan Review, it is noted that the Council have not identified any sites here for safeguarding for future development, removing them from the Green Belt. It is considered

that in the event the Council determine not to include land off Heath House Lane as a housing allocation at this time, then the land should be removed from the Green Belt and safeguarded for future development, meaning this could come forward through the process of the next Local Plan Review.

2.7 Alder King disagrees with the findings of the Council’s 2019 Green Belt Review which considers that development on land off Heath House Lane, Codsall would result in a moderate-high level of harm and queries the extent to which the parcel has been considered on its own merit. It is noted that the Council’s 2014 Green Belt Review found that this land “*makes a contribution to Green Belt purposes*” but this was not considered to be “*considerable*”. For the avoidance of doubt, an extract from the Council’s 2014 Green Belt Review is provided below. Land edged dark green was assessed to make a considerable contribution to Green Belt Purposes while land edged lighter green, containing land off Heath House Lane, was only found to make a contribution to Green Belt purposes. It is noted that, subsequent to the 2014 Green Belt review, land within parcel 5(A) below was removed from the Green Belt and now constitutes a proposed housing allocation as part of the Local Plan Review (site ref: 419a&b). Allocation of land off Heath House Lane should be considered in this context. It is considered that the Council’s position with regard to land off Heath House Lane should be consistent with its approach in supporting development on neighbouring land to the east (site ref: 419a&b).



2.8 Moreover, Appendix 3 – “Site Proformas of the Council’s Housing Site Selection Topic Paper 2021” concludes that notwithstanding the assessed moderate/high level of Green Belt harm posed by development of the land off Heath House Lane, this constitutes lesser Green Belt harm than the majority of land around Bilbrook/Codsall. This is reiterated in the Council’s Sustainability Appraisal of the South Staffordshire Local Plan Review, Preferred Options Plan, Regulation 18(III) SA Report, August 2021. Alder King therefore suggests this site requires further consideration by the Council as part of this Local Plan Review to accurately assess the “suggested” level of harm when considered in the context of the Council’s housing requirement and proposals for neighbouring residential development (site ref: 419a&b) (see also response to question 8 below).

- 2.9 Table 1 within the Green Belt assessment carried out by The Landmark Practice (**Appendix 2**) provides a site specific assessment on the contribution of land off Heath House Lane towards the five purposes of the Green Belt. In this regard, the following ratings are concluded:
- i. Checking the unrestricted sprawl of large built-up areas – Moderate;
 - ii. Preventing the merging of neighbouring towns – No contribution;
 - iii. Safeguarding the countryside from encroachment – Moderate;
 - iv. Preserve the setting and special character of historic towns – No contribution;
 - v. Assist urban regeneration, by encouraging recycling of derelict and other urban land – Strong.
- 2.10 Alder King is content to see safeguarded land sites come forward for development through the Local Plan Review process. This is the purposes of safeguarding the land and development in these locations has already been found to be sound. There is no need for delay and it is clear that there is a pressing need to release additional land to meet the needs of the plan period. Alder King further considers that land promoted by our client at Heath House Lane, Codsall is a prime example of land that could now be safeguarded for future development should the Council decide against its inclusion as a housing allocation under policy SA5 this time around. Land off Heath House Lane would make a logical extension to draft allocation 419a&b.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

- 2.11 In principle, Alder King support the principal aim of the spatial strategy to direct growth to the most accessible and sustainable locations in accordance with the Settlement hierarchy, avoiding a disproportionate level of growth in the district's less sustainable settlements.
- 2.12 Alder King supports the classification of Codsall/Bilbrook as a Tier 1 settlement within the hierarchy, offering a wide range of services and facilities and having access to key rail corridors into adjacent towns and cities. The sustainable growth of the settlement can be delivered through allocations made in the Local Plan along with windfall housing developments over the plan period. That being said, owing to the constraints of the Green Belt on the settlement, Alder King consider it necessary to direct further growth to this settlement as part of the Local Plan review, beyond what is currently proposed in policies SA1 & SA5 to ensure confidence that housing delivery at the settlement can be delivered (see also responses to questions 7 & 8 below). At present no land is being safeguarded for consideration in the next Local Plan Review stages.
- 2.13 In this regard, Policy DS3 proposes a delivery minimum of 8,881 dwellings over the plan period taking into account the contribution to the shortfall in the GBHMA. This equates to 444 no. dwellings per annum. The results of the 2020 Housing Delivery Test, published January 2021, evidence that South Staffordshire has delivered 255, 273 & 226 homes in the years 2017-18, 2018-19 & 2019-2020 respectively. This demonstrates the scale of uplift in dwellings to be delivered and so it is considered necessary that

appropriate deliverable sites, such as that of land off Heath House Lane, Codsall can come forward to support housing need in addition to the Council’s current housing allocation proposals.

Question 7: a) Do you support the proposed strategic housing allocations in policies SA1-SA4?; b) Do you agree that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

- 2.14 Alder King supports new strategic development locations to meet sustainable growth across the district and considers it appropriate that they be guided by their own policies and design guides to ensure acceptable comprehensive development which provides for strategic housing growth in conjunction with appropriate infrastructure and new facilities such as schools. For example, Policy SA1 on Land East of Bilbrook proposes that an SPD including an Infrastructure Delivery Strategy, masterplan and design code which is supported. The policy notes that this SPD is planned to be adopted in the “*early years*” of the plan period.
- 2.15 Owing to the Green Belt constraints of Codsall/Bilbrook, release of such land to facilitate development is supported, however, Alder King consider there to be further land available, appropriate and deliverable within the area which should also be considered such as that off Heath House Lane. Such sites would support housing delivery at a smaller scale to the proposed strategic allocations and provide immediate delivery within the early years of the plan period.
- 2.16 It is noted within the context of Bilbrook and Codsall that site allocation SA1 was determined in the Council’s 2019 Green Belt Review to have a harm rating of very high & high (site ref: 519). Notwithstanding the comprehensive development opportunities afforded by this strategic allocation, Alder King questions the exclusion entirely of Heath House Lane which demonstrated a lower harm rating to the Green Belt and consider this should also be brought forward as a housing allocation under Policy SA5 (see also response to question 8).

Question 8: Do you support the proposed housing allocations in SA5?

- 2.17 Notwithstanding proposed strategic allocation SA1, Alder King queries the proposals under SA5 in its allocation of only 3 sites at the Tier 1 settlement of Codsall where there is considered to be scope for further development within the sustainable settlement. In accordance with the Council’s settlement hierarchy, sustainable growth should be directed here in the first instance.
- 2.18 Land off Heath House Lane constitutes a natural extension of the built up areas of Codsall to the south. Acceptable access can be demonstrated here to facilitate residential development which would positively support housing need and when considered in the round, Alder King consider that the exclusion of this land at this stage of the Local Plan Review is an oversight. The land bounds the settlement boundary to the north and land neighbouring to the east is supported by the Council for allocation of residential development (site ref: 419a&b) which is supported by Alder King. Furthermore, Alder King consider the existence of Codsall & Wergs Garden Centre to the south east would assimilate with the aforementioned housing allocation and development on land off Heath House Lane to form a natural extension to Codsall to the

south and not unacceptably impact on the character of the settlement, open countryside nor compromise the purpose of the Green Belt in this location.

- 2.19 An extract is provided below from the Council's 2019 Green Belt Review (Figure 7.3a) visualising the harm rating afforded to land with regard to the Green Belt (land off Heath House Lane edged in red for reference).



- 2.20 The lighter blue shown on the site here signifies moderate-high harm which can be seen in the context of surrounding darker land identified as high/very high harm. In this regard, and having regard to proposed site allocation 419a&b Alder King consider this land to complement the current adjacent housing allocation. With regard to Green Belt impact, as stated within this report already, the site constitutes lesser harm than the majority of land around Bilbrook/Codsall and is commensurate to the moderate-high harm identified for site ref: 224 at Codsall which the Council proposes as a housing allocation for Codsall under Policy SA5.
- 2.21 Alder King considers the removal of land at Heath House Lane from the Green Belt and allocation for residential development would further add contingency and security in meeting the Council's housing requirement. A larger portfolio of sites for development will add contingency to allow for the changing economic climate and potential delays from other allocations coming forward. This is combined with the fact that reliance of the larger comprehensive strategic allocations will likely not start to deliver until some years into the plan period.
- 2.22 As provided within this report at paragraph 2.7, land at Heath House Lane was considered in the 2014 Green Belt Review under the umbrella of "parcel 5(A)", incorporating the current allocation proposal of site 419a&b. The reality is that the land at Heath House Lane was not promoted through the DPD process prior to this and was therefore deemed not available at that time. Only those sites that were considered available were considered. This land is now owned by Boningale Homes, who intend to deliver this for residential development, and so this constitutes land available now, deliverable and viable. Following allocation of this land for residential development through the Local Plan Review, Boningale Homes commit to delivering the site within 1 to 2 years to support the Council's housing delivery targets. Indicative site layouts suggest a yield of between 80-90 no. dwellings could be delivered on the site.

2.23 Ultimately, Alder King consider the land at Heath House Lane to constitute appropriate, sustainable development and suggest the Council review this parcel as part of the Local Plan Review for inclusion as an allocation site within the Draft Plan under Policy SA5. This would be delivered within 1-2 years of adoption of the Local Plan to support housing need and could be delivered with its own access, without reliance on any external parties that could give rise to a delay in delivery. This would see delivery towards the Council's housing need in advance of the proposed strategic sites which realistically are unlikely to deliver completions in the early years of the emerging Local Plan period. As supported by the site specific Green Belt review, prepared by The Landmark Practice, at **Appendix 2** land off Heath House lane makes a limited contribution to the purposes of the Green Belt at a local level on the southern edge of Codsall. The development of the proposed adjacent housing allocation (site ref: 419a&b) will also serve to materially change the immediate settlement edge and built context to the land off Heath House Lane by further adding to its built surroundings.

Boningale Homes Precedent

- 3.1 The land off Heath House Lane, Codsall is being promoted by Boningale Homes, who own the land, for delivery of residential development.
- 3.2 Boningale Homes is a family-owned and family-run local house builder established in 2014 with a local staff management structure, supported by a local labour supply chain including material suppliers in the west midlands.
- 3.3 Boningale Homes will deliver the proposed residential development on the site with high quality traditional spacious dwellings.
- 3.4 Inclusion of this site for allocation within the Local Plan would see the delivery of between 80-90 no. new homes, including affordable provision, within 1-2 years of plan adoption to support South Staffordshire's Housing need.
- 3.5 In this regard, photos are provided at **Appendix 3** showing the Boningale Homes development site at Millfields, Albrighton to demonstrate the standard of quality of new dwellings that would be delivered on land off Heath House Lane, Codsall. This comprises a 2 phase development that is being developed currently. Shropshire Council planning ref: BR/APP/OUT/08/0907 and 14/05456/REM (phase 1) and 14/02448/FUL (phase 2).

Appendix 1: Land off Heath House Lane Site Plan

Codsall



Appendix 2: Site specific landscape and visual Green Belt review

PROJECT: Green Belt Summary Position Statement: Land off Heath House Lane, Codsall

CLIENT: Boningale Homes Ltd

REF: P3482 (AC/GM/AS)

Date: 09 December 2021

1.0 INTRODUCTION

1.1 Boningale Homes Ltd has appointed the Landmark Practice to prepare a landscape and visual review of Green Belt Purposes, for land off Heath House Lane, Codsall (identified below in Plate 1), to accompany Preferred Options Representations as part of the South Staffordshire Local Plan Review.

1.2 The review below has been based on a desktop review and a subsequent winter site and surroundings visit, undertaken in December 2021 by a Chartered Member of the Landscape Institute.



Plate 1: Land Off Heath House Lane, Codsall (SHELAA Site: Ref. 515)

2.0 BACKGROUND AND PURPOSE

2.1 South Staffordshire Council (SSC) has previously prepared two Green Belt Study documents, the first in 2015 and then subsequently in 2019, the latter forming part of the current Local Plan Evidence base. These studies were carried out on the basis of larger scale land Parcels/units which often and in this case, do not coincide, with the scale of an individual site. Boningale Homes Ltd has therefore commissioned a site-specific Green

Belt Purposes Review, to address this and provide well considered landscape commentary in support of their representations.

- 2.2 This site-specific review is intended to assist SSC in its review of sites for allocation and/or for safeguarding. The land off Heath House Lane, Codsall (SHELAA Site Ref. 515) is identified as a potentially suitable site in the current Strategic Housing and Economic Land Availability Assessment¹ (SHELAA) 2021. A site-specific review carried out, at this point in time, is also able to account for the likely changes to the local context identified within the SSC's evolving Local Plan preferred site strategy.
- 2.3 The aim of this review therefore is to carry out a site-specific review of the five purposes of the Green Belt (GB) and identify the likely level of harm, to the same methodology as SSC's latest GB Study 2019², but applied to a site-specific scale, whilst also accounting for changes in context. Consideration has also been given to the Local Government Association/Planning Advisory Service Green Belt Advice Note (February 2015)³ in the preparation of this position statement. This advice note is also referenced in the South Staffordshire Green Belt Study 2019.
- 2.4 The findings of this site-specific review have then been compared with the published findings carried out at a broader scale, for parcels in the locality, with an explanation for any changes in judgment. This information is provided voluntarily to assist SSC in further consideration of the merits of land off Heath House Lane, Codsall, in a manner which more accurately reflects current and evolving circumstances on adjacent land.

3.0 DESKTOP REVIEW FINDINGS

- 3.1 This site-specific Green Belt assessment, whilst focusing on the issue of Green Belt within South Staffordshire and the land off Heath House Lane, has been prepared in the context of the National Planning Policy Framework (updated 2021), current Planning Practice Guidance, relevant legal cases and South Staffordshire Core Strategy Local Plan Environmental Policies (including CP2, EQ1, EQ3 and EQ4), which provide the wider planning context.
- 3.2 These and relevant advice notes relating to the Green Belt have been referenced but are not repeated here. The site under consideration is identified on the interactive planning policy map⁴ which indicates the site's context on **Plates 2 and 3** below.

¹ Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021

² South Staffordshire Green Belt Study (Stage 1 and Stage 2 Report) Prepared by LUC, July 2019

³ Local Government Association/Planning Advisory Service (PAS) Planning on the Doorstep the Big Issues-Green Belt Advice Note Peter Brett Associates, Updated February 2015

⁴ South Staffordshire Local Plan Interactive Map 2021

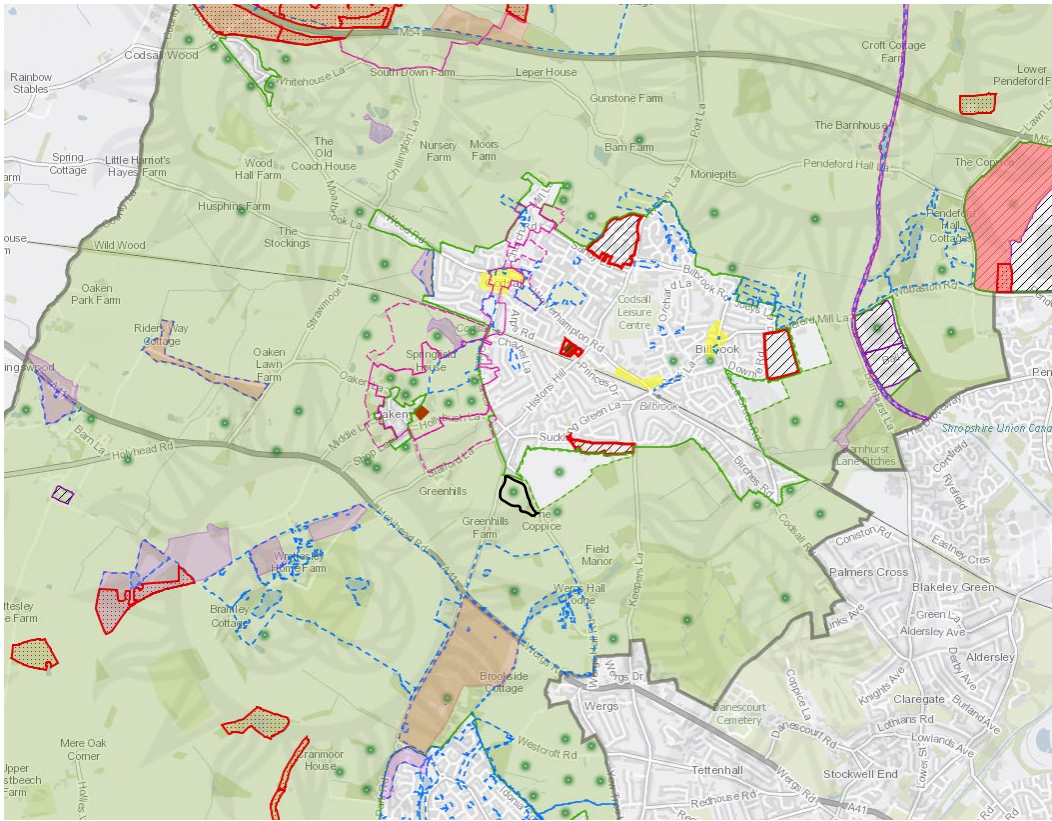


Plate 2: Extract from South Staffordshire Local Plan Interactive Map with SHELAA Site 515 identified with a black outline (Wider Codsall Context)

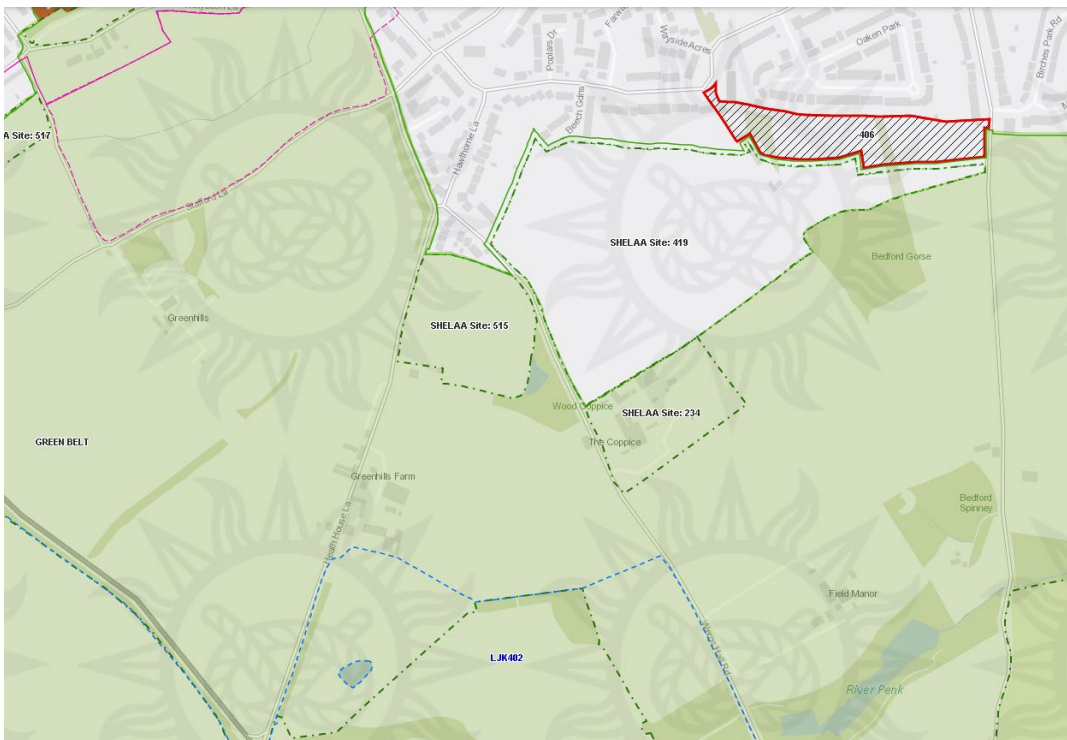


Plate 3: Extract from the South Staffordshire Local Plan Interactive Map (Allocated 2018 outlined in red and SHELAA 2021 Safeguarded and other Sites)

3.3 Initially, a desktop review of the South Staffordshire Green Belt Study 2019 findings relating to the Green Belt land parcels which provide the context to the land off Heath House Lane, Codsall (SHELAA site: Ref. 515), has identified the following:

- The Stage 1 Assessment of Parcel Contribution to Green Belt Purposes, of the 2019 Green Belt Review, whilst concluding a rating of ‘strong’ contribution alongside purposes P1, P3 and P5 (as identified in the summary table extract below), this was a judgment based on:
 - A very large land parcel area, extending to the south and east of Codsall and Billbrook, with some land much closer or adjacent to the West Midlands conurbation than others.
 - In respect of Purpose 1 (Checking unrestricted sprawl of large built-up areas) the degree of urban development, degree of spatial and visual openness and relationship with the wider countryside, is clearly variable, within the broad scale unit of assessment used and the general conclusions reached do not appear to reflect more localised circumstances.
 - Under Purpose 3 in concluding ‘strong’ harm rating the assessment identifies that *‘The land contains the characteristics of open countryside (i.e. An absence of built or otherwise urbanizing uses in Green Belt) and does not have a stronger relationship with the urban area than the wider countryside.’* Whilst it is factually correct that Site 515 includes characteristics of open countryside the site’s relationship with the existing urban area, in this particular situation, warrants more detailed consideration, particularly given the adjacent field is proposed for allocation and subsequent development.
 - Under Purpose 5, all parcels throughout the Green Belt have assisted in urban regeneration by encouraging recycling of derelict and other urban land.
 - Under Purposes 2 and 4, the Green Belt Review 2019 confirms a rating of ‘weak/no contribution’ to harm for the land in which site ref. 515, is located. The land is identified as playing *‘no significant role’* in preventing the merging of neighboring towns due to distance between the West Midlands conurbation and Albrighton, its nearest town. The published assessment then also confirms that the land “does not contribute, in this case, in “Preserving the setting and special character of an historic town” (GB Purpose 4).

Assessment of Parcel Contribution to Green Belt Purposes (as derived from Stage 1 Study)

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is close or adjacent to the edge of the West Midlands conurbation, contains no significant urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside.	Strong
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the West Midlands conurbation and Albrighton, its nearest neighbouring town.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town.	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong

Plate 4 Extracts from the Stage 1 Green Belt Review 2019 Assessment of Contribution to Green Belt Purposes

- The Stage 2 Assessment in the 2019 Green Belt review focusing on a more localised assessment of potential for harm arising from promoted sites within the Green Belt, also covers a substantial area and the conclusions reached for the area in which Site 515 is located are again general.
- The assessment concludes by reaching a harm rating judgment of ‘Moderate to high’. Desk top observations relating to this include:
 - That Table 7.4 (extracted in **Plate 5**, below), in the Green Belt Review 2019, identifies only 7.8% of the Green Belt falls within a lower category of harm.
 - The concluding Stage 2 assessment statement for the sub parcel S46Bs2, which includes SHELAA site Ref. 515, extracted in **Plate 6** below, is also of note.
 - The Stage 2 findings summarized below, refer to Site Ref. 515, with 210, 236 and 237, as all being sites that have the potential to be released, in parts of the Green Belt, where there is some containment by existing development.
 - Furthermore, the associated Stage 2 assessment statement concludes that some identified sites within the assessed sub-parcel (including site 515) could be released from the Green Belt without significantly compromising the distinction between Codsall and the West Midlands Conurbation. The conclusions also make further reference to the partial containment provided

to those sites by urban uses and identify them as sites where there is potential to simplify the Green Belt Boundary without weakening the integrity of surrounding Green Belt land.

- These conclusions identify parts of the Green Belt, including Site Ref. 515, where more limited harm to the Green Belt, arising from release, at a site level, is predicted. The published commentary regarding scenario S46Bs2 is clearly relevant to site Ref:515 and the local boundary of the Parcel indicated is distinct and contained by the Heath House Lane, to the west and Wergs Hall Road to the east alongside the site. The boundary to the east coincides with that of the forthcoming allocation site.

Scenario	Size (ha)	Rating
S46Bs2 Release of areas that have some containment by existing development	13.91	Moderate - High

List of Sites Within the Scenario

Ref: 210 (Housing); Ref: 236 (Housing); Ref: 237 (Housing); Ref: 515 (Housing)

The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on the surrounding countryside. However limited areas of land identified on either side of the River Valley lying within this sub-parcel could be released without significantly compromising the distinction between Codrall and the West Midlands conurbation. The release of these identified areas, some of which are partially contained by or contain urbanising uses, would simplify the resulting Green Belt boundary without weakening the integrity of surrounding Green Belt land.

Harm Ratings Overview Map of Land within Sub-Parcel

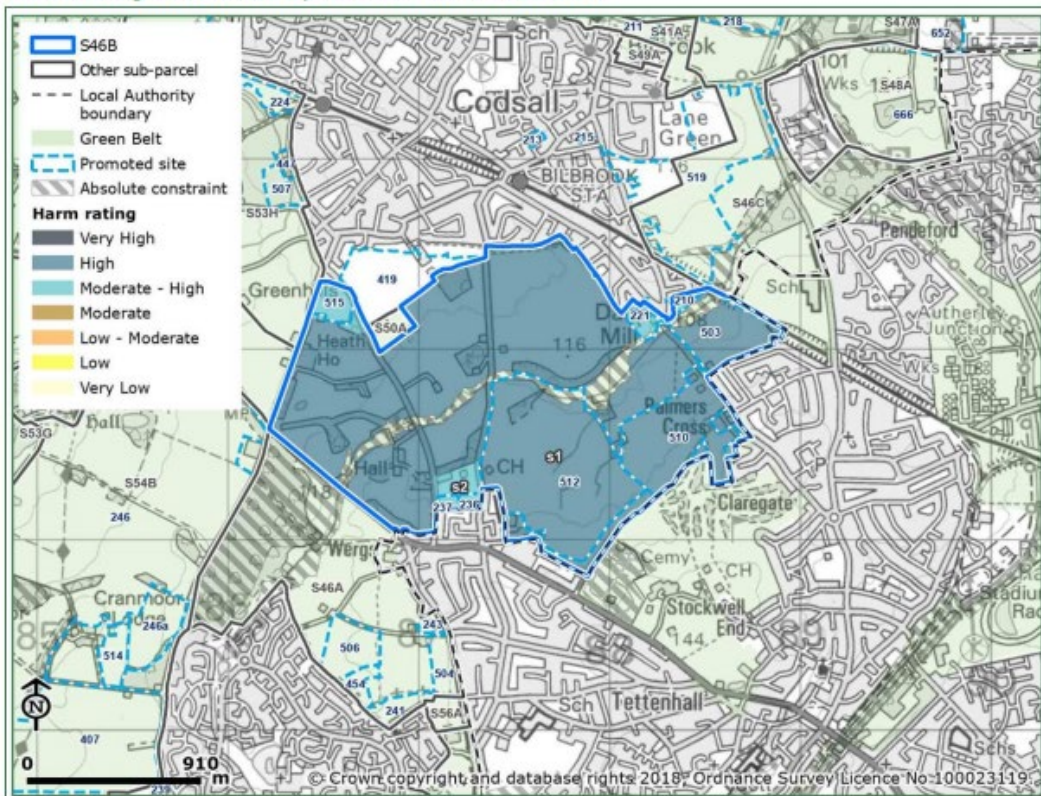


Plate 5 Extracts from the Stage 2 Green Belt Review 2019 Assessment of potential harm

- It is also noteworthy that since the preparation of the Green Belt Review, in 2019, the ‘safeguarded’ site identified in the 2018 Local Plan (SHELAA Site: Ref. 419 Land off Keepers Lane) to the east of the land under consideration here (SHELAA Site: Ref. 515), is now identified in the Local Plan Preferred Options, November 2021, as one of the Council’s preferred options for housing. This would, when implemented, materially change the immediate settlement edge and built context to Site Ref. 515, by further adding to its built surroundings. (TLP bold emphasis)

3.4 The above interim desk top based conclusions identify strategic potential for Green Belt release, with limited harm, within Site Ref. 515. This in the context where so much of the district comprises Green Belt, where more land needs to be released to provide much needed housing and with a more localised/balanced assessment it appears this is achievable.

3.5 A site-based assessment for SHELAA Site 515 has been carried out in the next section, to:

- Supplement the above findings;
- To assist the Council in their Local Plan Review; and
- To accompany Local Plan Review Written Representations, by providing a more localised level site assessment to supplement and to be read alongside the Green Belt Study 2019 findings, carried out at a broader strategic scale.

4.0 SITE SPECIFIC ASSESSMENT FINDINGS AND COMPARISON WITH THE COUNCIL’S PUBLISHED GREEN BELT REVIEW

4.1 As part of the site-specific Green Belt assessment, we have considered factors affecting the contribution to Green Belt purposes 1, 3 and 5 (of most relevance, in this case, for the reasons set out in Section 3, above), the Local Government Association Planning Advisory Service (PAS) 2015 Advice Note on Green Belt and site opportunities for Green Belt mitigation and enhancement, alongside other merits related to the site’s sustainability. Figure 1 and associated Photographs are used below to illustrate the findings.

4.2 The approach, methodology and criteria for the site-specific review of the Green Belt and level of harm follows that set out in the South Staffordshire Green Belt Study 2019. The assessment has been informed by a desktop and a winter site-based survey.

Factors affecting the contribution to Green Belt purposes 1, 3 and 5

4.3 Table 1 below provides a summary of the comparative findings of a site-specific assessment conducted by The Landmark Practice (TLP) alongside the South Staffordshire Green Belt Study Stage 1 Findings.

4.4 Table 2 below provides a summary of the comparative findings of a site-based assessment conducted by The Landmark Practice (TLP) alongside the South Staffordshire Green Belt Study 2019 Level of Harm Stage 2 Findings.

Table 1: Comparative findings of a site-specific assessment conducted by The Landmark Practice (TLP) alongside the South Staffordshire Green Belt Study Stage 1 Findings

Green Belt Purpose	Councils/LUC Stage 1 Study Assessment	Rating	TLP Site-Specific Assessment (515)	Rating
P1 Checking the unrestricted sprawl of large built-up areas	Land is close to or adjacent to the West Midland Conurbation, contains no significant urban development and has strong openness. It retains a relatively strong relationship with the wider countryside.	Strong	This site is distant from the West Midland Conurbation. It contains no significant urban development and retains openness but is to an extent contained by built development to the north and partially to the south. Also, by roads, particularly Heath House Lane to the west. If the preferred site for housing off Keepers Lane comes forward, it would also be contained by this development, to the east. Whilst there is some relationship with the surrounding countryside this is limited by the containment afforded by existing woodland and surrounding tree cover and the fall of the southern part of the land toward the Settlement.	Moderate
P2 Preventing the merging of neighboring towns	Land plays no significant role due to distance between the West Midlands Conurbation and Albrighton, its nearest neighboring town.	Weak/No Contribution	As for Stage 1 South Staffordshire Green Belt Study	No Contribution
P3 Safeguarding the Countryside from encroachment	Land contains the characteristics of open countryside (i.e. The absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area that with the countryside.	Strong	Land contains the characteristics of open countryside (i.e. The absence of built or otherwise urbanising uses in Green Belt terms) but has a stronger relationship with the settlement area as it is partially and potentially will be further contained by built or other urbanising features if land of Keepers Lane becomes housing.	Moderate
P4 Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town.	Weak/No Contribution	As for Stage 1 South Staffordshire Green Belt Study	No Contribution
P5 Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong	As for Stage 1 South Staffordshire Green Belt Study	Strong

Table 2: Comparative findings of a site-specific assessment conducted by The Landmark Practice (TLP) alongside the South Staffordshire Green Belt Study Level of Harm Stage 2 Findings

Scenario	Size (ha)	Rating	TLP Site-Specific Assessment (515)	Size	Rating
S46Bs2 sub-parcel			Site Ref. 515		
Release of areas that have some containment by existing development	13.91	Moderate - High	Release of an area that has some containment from existing development to the north and south and with the building out of preferred allocation site Ref. 419 Land off Keepers Lane, also would have containment, to the east.	3.2Ha	Moderate On the basis that no contributions to Green Belt Purposes are considered strong for the reasons set out in the comparative Stage 1 Study. Also, the release of site Ref. 515, would <u>not</u> significantly weaken the adjacent Green Belt functions by isolating or containing any areas that make a stronger contribution.
List of Sites within the Scenario			Site within scenario		
Site Ref. 210 (Housing); Ref. 236 (Housing; Ref. 237 (Housing); Ref. 515 (Housing)			Site 515 (Housing)		
The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation and preventing encroachment on surrounding countryside. However, limited areas of land identified on either side of the river valley lying within this sub-parcel could be released without significantly compromising the distinction between Codsall and the West Midlands Conurbation. The release of these identified areas, some of which are partially contained or contain urbanizing uses, would simplify the resulting Green Belt Boundary without weakening the integrity of surrounding Green Belt Land.			The site Ref, 515 makes a moderate contribution to preventing sprawl and a moderate contribution to preventing encroachment on surrounding countryside. However, the site comprises a limited area of land that could be released without significantly compromising the distinction between Codsall and the West Midlands Conurbation. The release of the site Ref. 515 would affect land already partially contained by built/urbanizing uses and which would also be contained to the east if the preferred housing site off Keepers Lane is developed for housing. Localised realignment of the Green Belt Boundary would simplify the resulting Green Belt Boundary without weakening the integrity of surrounding Green Belt Land. Heath House Lane, as a visual detractor, provides a logical Green Belt Boundary along the western edge of the site, with the hedged boundary and existing bungalow, defining it to the south. These adjustments would 'round off' the settlement edge effectively, where there is not an absence of built development.		

Openness and Permanence/Green Belt Boundary Issues

- 4.5 In addition to the five purposes, openness is identified in the NPPF as an ‘essential characteristic’ of Green Belt rather than a function or purpose and this also needs to be considered alongside the five purposes. Case law and NPPF Planning Practice Guidance⁵ has defined openness as having a spatial and visual aspect and that openness is not concerned with the character of the landscape but instead relates to the ‘absence of built development and other dominant urban influences’ (Inspector to the Welwyn Hatfield Borough Council, 2017).
- 4.6 Releasing land on site Ref. 515 from the Green Belt would inevitably lead to some harm to spatial and visual openness, however, the harm would be limited, as the site is limited in scale, in a peripheral/edge location alongside a wide area of Green Belt Land between large settlements, where Green Belt is further safeguarded by some protected historic parkland and the constraint of a river corridor. Site Ref.515 is spatially and visually well related to the existing built settlement edge (See Photograph 1), road network and preferred housing site to the east (see Photograph 2) and if developed has well defined boundaries limiting harm on the openness of the surrounding area. Further visual containment is afforded to the land by woodland and the wider heavily treed off-site parkland context to the south and west (See Photographs 3 and 4).
- 4.7 As Green Belt is a permanent planning designation, there is recognition that there are benefits in using features which are clearly defined on the ground to act as Green Belt Boundaries. Site Ref. 515 has well defined boundaries provided by roads, hedge lines and woodland which would be able to play a physical and visual role in permanently separating the settlement area from the countryside. The boundary features of this site integrate well with those on SSC’s preferred housing site in Codsall, off Keepers Lane (SHELAA Ref. 419), in providing/delivering an opportunity for a simplified, logical and enduring Green Belt Boundary to the south of the settlement (See **Figure 1**, below, for the potential for Green Belt boundary realignment, whether both sites are allocated, or if Site Ref. 515 were to be safeguarded, as a last resort).

⁵ Planning Practice Guidance – Green Belt Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019



Photograph 1: Existing built development on the site's northern boundary



Photograph 2: Indicating land beyond Wergs Hall Road, to the east, which is the Preferred Site for Housing Land off Keepers Lane (SHELAA Ref. 419)



Photograph 3: Existing containment afforded to the site by woodland, parkland trees and an existing dwelling on the south-east and southern boundaries.



Photograph 4: Layers of trees along Heath House Lane and within the parkland at Greenhills, limiting the potential for harm to the openness of the wider local area.

The Local Government Association Planning Advisory Service (PAS) 2015 Advice Note on Green Belt

- 4.8 The PAS Advice note on Green Belt helpfully lists the types of areas of land that might make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, these are set out below with a corresponding assessment of Site 515 alongside each identified characteristic.
- 4.9 Taking each in turn and specifically relating each to Site Ref. 515, our assessment has identified the following, included in **Table 3**, below:

Table 3: Types of areas of land which might make a limited contribution to Green Belt assessed alongside Site Ref. 515

Types of land making a limited contribution to the Green Belt (PAS Green Belt Advice Note, 2015) alongside a Specific Site Ref. 515 Assessment
<i>Land partially enclosed by development, i.e., where new development would effectively be 'infill' development</i>
<ul style="list-style-type: none"> • Site Ref. 515 is already enclosed by built development to the north and an isolated dwelling to the south. • With the allocation of the preferred site ref. 419 at Keepers Lane the site would also be enclosed by built development from the east. • The section of Heath House Lane alongside this site also has streetlights.
<i>Land where development would be well contained by the landscape</i>
<ul style="list-style-type: none"> • Site Ref. 515 is contained from the north by existing built development, from the south-east by a woodland and locally by boundary hedgerows and by treed parkland to the west and south.
<i>Land where harm to the qualities that contributed to the distinct identity of separate settlements would be limited</i>
<ul style="list-style-type: none"> • There would be no effects on the coalescence of towns arising from development on this site. • The parkland setting and separation of the settlement from the cluster of roadside farmsteads to the south alongside Heath House Lane, would be maintained. • The isolation and surrounding parkland setting of Halls within estates surrounding this part of Codsall would be maintained.
<i>A strong boundary could be created with a clear distinction between 'town' and 'country'.</i>
<ul style="list-style-type: none"> • Strong boundary features are already present in the form of woodland, well defined field boundaries and hedge lined lanes. • Roads to the west and east already provide that distinction. • There is potential for strengthening existing boundaries with further locally distinctive hedgerow trees and through secured and improved hedgerow management.

- 4.10 The above indicates a piece of land which currently makes a limited contribution to Green Belt, at a local level.

Reflections on the findings of the Stage 3 Landscape Sensitivity Assessment

- 4.11 Paragraph 1.9, in the South Staffordshire Green Belt Study 2019, identifies the relationship between the landscape sensitivity and Green Belt contribution/harm *‘in that physical element which play a role in determining landscape character and sensitivity are also likely to play a role in spatial relationships between urban areas and countryside.’*
- 4.12 The South Staffordshire Landscape Sensitivity Assessment⁶ like the Green Belt Study has been prepared at a broad area scale and the assessment report states at Paragraph 1.7 that *‘The study highlights the likely landscape and visual sensitivities within each assessment area rather than providing a site level assessment as might be required for a planning application.’*
- 4.13 The conclusions for Parcel SL35s1 in Appendix 1 (Page A1.177) have some relevance to Site Ref. 515. Following a review of the findings, observations include:
- That the findings overall for the appraisal of the landscape sensitivity of this Parcel, which extends over 174 ha, need to be treated with caution when applying them to a specific promoted site. The parcel area considered was much greater than that occupied by site Ref. 515 (3.2Ha) and in this situation included areas with historic landscape area designation, listed buildings, contrasting landform and areas away from the existing settlement edge.
 - In addition, the conclusion on the overall sensitivity level is identified as ‘Moderate to high’ and this is explained by assessment alongside identified criteria. Most judgments, against the identified criteria, are appraised as being in the low or moderate level of sensitivity to development category (12 No), and the actual spread of conclusions alongside the criteria is not skewed towards moderate and high sensitivity, as appears to be indicated by the conclusions. The findings also do not indicate an equal split of high (4No) and low sensitivity (6No) judgments, in addition to those at the moderate level, which at a very simplistic level would indicate that Moderate sensitivity to development, overall, could have been a more appropriate judgment for Parcel SL35s1.
 - The judgments alongside the criteria conclude moderate or low sensitivity are generally those which relate to the site that is the subject of this position statement. It therefore does not appear reasonable for the evidence base to potentially count against the suitability of this site, alongside Green Belt Considerations or in comparison with other sites.
 - The appraisal also does not account for the potential for mitigation in reaching judgments on landscape sensitivity.

⁶ South Staffordshire Landscape Sensitivity Assessment (Final Report) Prepared by LUC, July 2019

Site Ref. 515 Opportunities for mitigation to further limit harm on the Green Belt, if released and potential for beneficial uses, alongside other merits, related to the site's sustainability

- 4.14 Planning Practice Guidance identifies that there are often opportunities to offset harm to the Green Belt when land is released⁷. Therefore, Planning Practice Guidance indicates that it is important for the planning authority to consider the potential for further limiting harm and the potential for beneficial uses of the Green Belt to arise, with an adjustment.
- 4.15 To assist SSC therefore, **Figure 1**, below, has been annotated with potential mitigation to further limit any harm and with opportunities for beneficial uses of Green Belt, which could accompany the release of Site Ref. 515.

⁷ Planning Practice Guidance – Green Belt Paragraph: 002 Reference ID: 64-002-20190722 Revision date: 22 07 2019

Figure 1: Potential Mitigation and Beneficial Uses of Green Belt



Sustainability

4.16 Sustainability is also an important consideration alongside Green Belt release and site 515 has some important and positive attributes in South Staffordshire, including:

- Tier 1 settlement and Main Service Village;
- Good Accessibility to bus stops/routes and train stations;
- Avoids Grade 1 and Grade 2 agricultural Land classifications in this local area (Based on Agricultural Land Classification map West Midlands Region (ALC004);
- Good opportunities for restoring, conserving and enhancing green and blue infrastructure, including wetland, grassland habitat, woodland cover with new associated greenways;
- The site would make a valuable contribution to the Councils housing land supply; and
- Through allocation of the site Boningale Homes would be able to offer a high-quality residential development that is super energy efficient. The Council would be able to work with a high-quality developer that can offer a wide choice of market housing for local economically active people that either want to work at home or in the nearby Tier 1 settlement of Codsall enabling them to remain in the local area and avoid any out commuting to the larger conurbations.

5.0 CONCLUSIONS

5.1 Overall, this Green Belt Position Statement concludes that SHELAA Site 515 makes a limited contribution to Green Belt Purposes, at a local level, on the southern edge of Codsall and that this contribution would reduce further with development of the Councils' identified preferred site to the east, Land off Keepers Lane (SHELAA Site 419). The findings extend those in the South Staffordshire Green Belt Study 2019, which itself, identified the Site 515's potential for limited Green Belt harm, at Stage 2.

5.2 This assessment provides further evidence for why harm would be limited, at the site level and identifies strong potential for mitigation, beneficial use and sustainability.

REFERENCES

- 1 Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021
- 2 South Staffordshire Green Belt Study (Stage 1 and Stage 2 Report) Prepared by LUC, July 2019
- 3 Local Government Association/Planning Advisory Service (PAS) Planning on the Doorstep the Big Issues-Green Belt Advice Note Peter Brett Associates, Updated February 2015
- 4 South Staffordshire Local Plan Interactive Map 2021
- 5 Planning Practice Guidance – Green Belt What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt? Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019
- 6 South Staffordshire Landscape Sensitivity Assessment (Final Report) Prepared by LUC, July 2019
- 7 Planning Practice Guidance – Green Belt How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements? Paragraph: 002 Reference ID: 64-002-20190722 Revision date: 22 07 2019

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Planning Practice Guidance – Green Belt including:

What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?

Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019

How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements?

Paragraph: 002 Reference ID: 64-002-20190722 Revision date: 22 07 2019

How can the strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured?

Paragraph: 003 Reference ID: 64-003-20190722 Revision date: 22 07 2019

National Character Area assessments No 61 for the Shropshire, Cheshire and Staffordshire Plain

The Planning for Landscape Change SPG (2000) Including the Tree and Woodland Strategy Revoked

The Staffordshire County Council Historic Environment Character Assessment (2011).

The Staffordshire County Council Draft Staffordshire Landscape Character Assessment Review (2015) (not adopted);

The Staffordshire County Council Historic Landscape Characterisation Mapping (2016)

The South Staffordshire Landscape Sensitivity Study Update (2017)

Appendix 3: Boningale Homes Millfields Site Photos





