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Black Country Green Belt Study

Stage 1 and 2 Report
Prepared by LUC
September 2019

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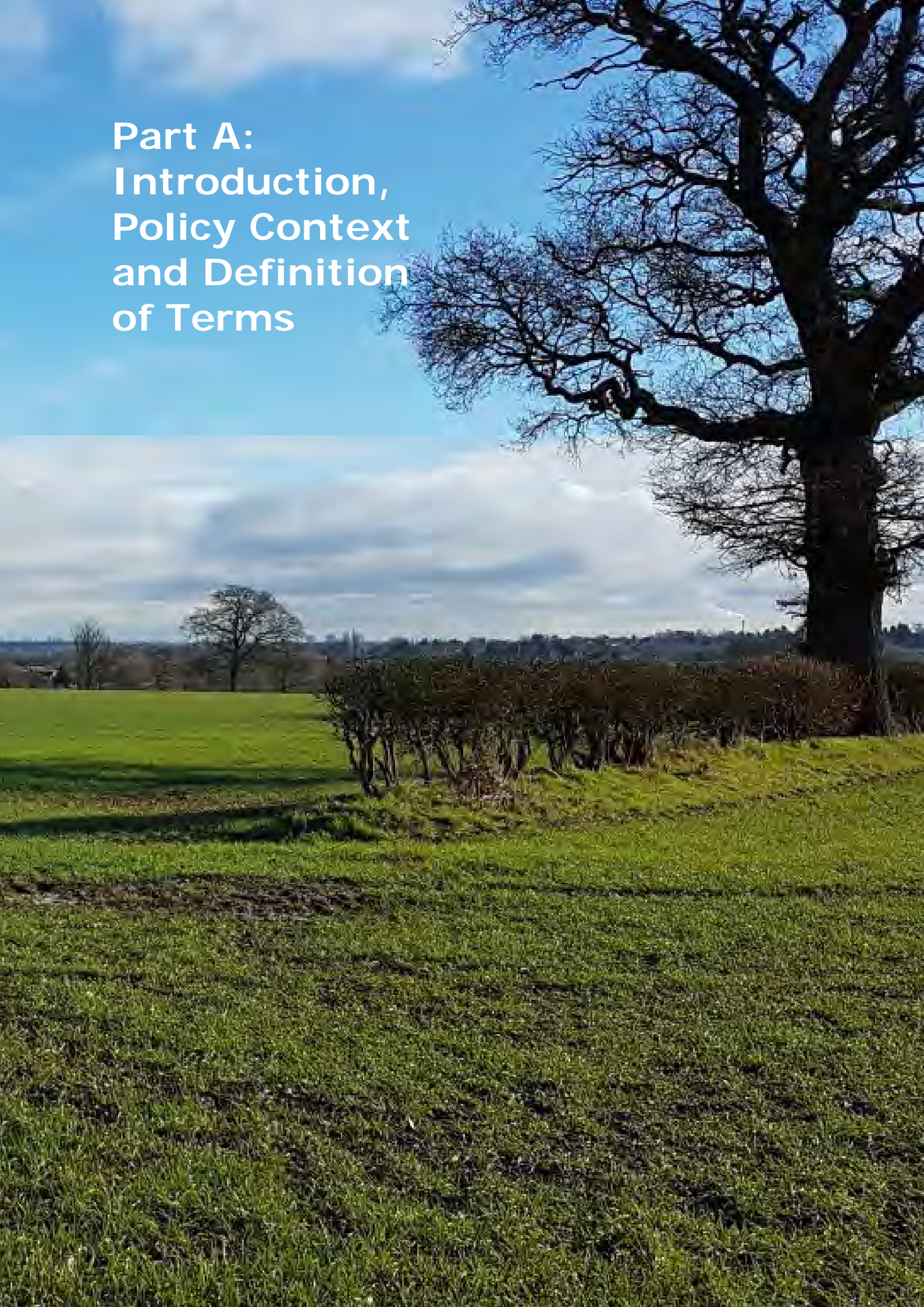
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List of Abbreviations

NPPF	National Planning Policy Framework
pSINC	Potential SINC
SAC	Special Area of Conservation
SBI	Site of Biological Importance (within South Staffordshire, equivalent of SINC in the Black Country)
SINC	Site of Importance to Nature Conservation (within the Black Country, equivalent of SBI in South Staffordshire)
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

**Part A:
Introduction,
Policy Context
and Definition
of Terms**



1 Introduction

- 1.1 In 2018 LUC was commissioned 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 forms 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. This report sets out the findings of the Stage 1 and Stage 2 Green Belt Assessment for the Black Country. A separate report sets out the Stage 1 and 2 findings for South Staffordshire.
- 1.2 LUC is one of the leading Environmental Consultants in the UK specialising in Environmental Planning, Design and Management. LUC's involvement in Green Belt policy development and review is unparalleled. We have advised developers and local authorities across the country on Green Belt issues, as well as undertaking numerous independent Green Belt studies at a range of scales. We have completed Green Belt Assessments or Reviews on behalf of nearly 40 Local Authorities throughout England.

Study aims and objectives

- 1.3 The overall aim of the Study was to undertake an independent, robust and transparent assessment of Green Belt within the Black Country. This includes a comprehensive assessment of the performance of Green Belt land in line with policy set out in the National Planning Policy Framework (NPPF) good practice guidance, local plan examination inspectors' reports and case law. The Study draws out variations in the contribution of land to the five Green Belt purposes, identifying areas of land whose performance ranges from relatively weak to relatively strong in Green Belt terms. The Green Belt within the Black Country area is illustrated in **Figure 1.1**.
- 1.4 The Green Belt Study has two stages.
- 1.5 **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 Black Country, 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, as set out in Para 134 of the NPPF:
- 1 to check the unrestricted sprawl of large built-up areas;
 - 2 to prevent neighbouring towns merging into one another;
 - 3 to assist in safeguarding the countryside from encroachment;
 - 4 to preserve the setting and special character of historic towns; and
 - 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.6 **Stage 2** includes 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 the four Black Country authorities.

- 1.7 Stage 1 considers variations in the **contribution** made by land to Green Belt purposes, whereas Stage 2 assesses the **harm** to the Green Belt that would result from the release of specific sites or parcels of land. In assessing harm, in addition to the contribution to Green Belt purposes, consideration is given to how loss of land from the Green Belt would affect the strength/integrity of the remaining Green Belt and the residual Green Belt boundaries. This approach is consistent with the latest case law on the matter, notably *Calverton Parish Council v Greater Nottingham Councils & others (2015)*¹, which found that planning judgments setting out the ‘exceptional circumstances’ for the amendment of Green Belt boundaries require consideration of the ‘nature and extent of harm’ to the Green Belt.
- 1.8 The factors which influence the assessment of harm are the same as those which determine variations in contribution, but considering a specific area of land allows a more detailed analysis of the role of site/parcel location, size and boundaries and how these are weighed up alongside the strategic contribution findings (relating to each Green Belt purpose) in order to arrive at a single overall harm rating. The assessment process also allows ‘sub site or sub area scenarios’ to be identified where smaller areas of land (i.e. part of a site or parcel) could potentially be released with less resultant harm to Green Belt purposes. This information on Green Belt harm can be weighed up by the Councils alongside sustainability and viability considerations to make decisions on the potential suitability of releasing Green Belt land.
- 1.9 Alongside the Green Belt study, **Stage 3** involved undertaking a landscape sensitivity assessment, assessing the sensitivity of land within the Black Country to housing and employment development. There is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character and sensitivity are also likely to play a role in the spatial relationship between urban areas and the countryside. However, there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land. The findings of the Stage 3 landscape sensitivity assessment for the Black Country and South Staffordshire are presented in two separate accompanying reports.

Duty to Co-operate Engagement

- 1.10 A method statement setting out the proposed assessment approach for the Black Country Green Belt Study was circulated to the Councils’ key stakeholders with whom the Councils’ have a duty to cooperate,² as well as other organisations the Councils considered necessary. This included the following:
- Birmingham City Council.
 - Bromsgrove District Council.
 - Cannock Chase District Council.
 - Coventry City Council.
 - Environment Agency.
 - Historic England.
 - Lichfield District Council.
 - Natural England.
 - North Warwickshire Borough Council
 - Redditch Borough Council

¹ See para. 2.24 for more details.

² Section 110 of the Localism Act (2011).

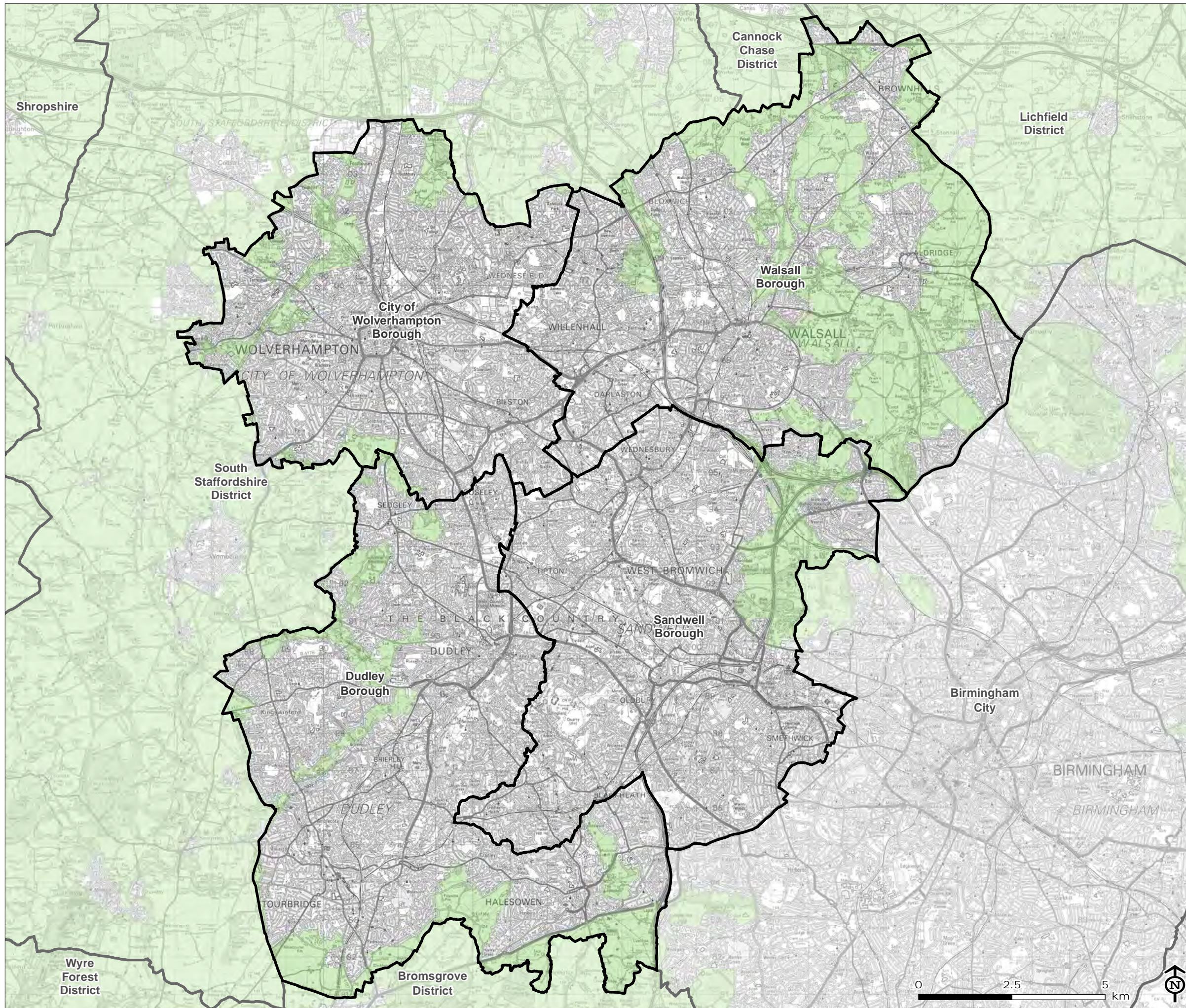
- Shropshire Council.
- South Staffordshire District Council.
- Stafford Borough Council.
- Staffordshire County Council.
- Stratford-on-Avon District Council.
- Tamworth Borough Council.
- Telford & Wrekin Council.
- Wildlife Trust.
- Wyre Forest District Council.

1.11 Stakeholders were invited to comment on the draft methodology and a summary of their responses and how their comments have been addressed is provided in **Appendix 1**.

Report Structure



1.12 This report is divided into four parts:

Part A: Introduction and context	
Chapter 1	Sets out the aims and objectives of the study and the consultation that has informed its preparation.
Chapter 2	Summarises the relevant national and local policy context and the origins of the West Midlands Green Belt.
Chapter 3	Sets out the definitions which inform the Green Belt Assessment methodology for Stages 1 and 2 of the Study.
Part B: Stage 1 Assessment of Contribution	
Chapter 4	Outlines the assessment methodology for Stage 1 of the Study: the assessment of contribution to the Green Belt purposes.
Chapter 5	Summarises the findings of the Stage 1 assessment. The detailed assessment findings are contained in Appendix 2 .
Part C: Stage 2 Assessment of Harm	
Chapter 6	Outlines the assessment methodology for Stage 2 of the Study: the assessment of harm of the release of land from the Green Belt
Chapter 7	Summarises the findings of the Stage 2 assessment. The detailed assessment findings are contained in Appendix 3 .
Part D: Making Changes to the Green Belt	
Chapter 8	Summarises the next steps and discusses mitigation measures which may be used should land be released from the Green Belt, along with the potential beneficial uses of Green Belt land.



Black Country Green Belt Study

Figure 1.1: Overview of Black Country Green Belt

-  Black Country Local Authorities
-  Other Local Authority
-  Green Belt

0 2.5 5 km



Map Scale @A3: 1:100,000



2 Policy Context

Introduction

- 2.1 This chapter provides a summary of National Green Belt policy, relevant guidance and case law, and the local Green Belt and planning policy context.

National Green Belt Policy

- 2.2 In 1955 the Government established (through Circular 42/55) the three main functions of the Green Belt as:

- Checking growth of large built-up areas.
- Preventing neighbouring settlements from merging.
- Preserving the special character of towns.

- 2.3 Emphasis upon the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries only to be altered in exceptional circumstances was established through Circular 14/84.

- 2.4 In January 1988 PPG2 Green Belts (Planning Policy Guidance Note 2), subsequently replaced in 1995 and further amended in 2001, explicitly extended the original purposes of the Green Belt to add:

- to safeguard the surrounding countryside from further encroachment; and,
- to assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).

- 2.5 PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012³, revised and re-published in July 2018⁴ and in February 2019⁵, and this document currently provides national Green Belt policy. The current position of the Government in relation to Green Belt, provided through the NPPF, is set out below.

National Planning Policy

- 2.6 Government policy on Green Belt is set out in Chapter 13 of the National Planning Policy Framework (NPPF)⁶. Paragraph 133 of the NPPF states that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*.
- 2.7 This is elaborated in NPPF paragraph 134, which states that Green Belts should serve five purposes, as set out overleaf.

³ Department of Communities and Local Government (2012) National Planning Policy Framework A available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁴ Department of Communities and Local Government (2018) National Planning Policy Framework A available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁵ Department of Communities and Local Government (2019) National Planning Policy Framework. A available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁶ Department of Communities and Local Government (2019) National Planning Policy Framework. A available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

The NPPF purposes of Green Belt

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.8 The NPPF emphasises in paragraph 135 and 136 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state 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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”*
- 2.9 Paragraph 137 of the NPPF requires that the *“strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development”* before concluding that the exceptional circumstances exist (paragraph 137), specifically whether the strategy:
- a. *“makes as much use as possible of suitable brownfield sites and underutilised land;*
 - b. *optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*
 - c. *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*
- 2.10 Paragraph 138 of the NPPF indicates that *“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 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”.*⁷
- 2.11 Paragraph 139 of the NPPF suggests that Local Planning Authorities may wish to identify areas of ‘safeguarded land’ between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period.
- 2.12 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states *“local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”* (Paragraph 141).

⁷ This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- 2.13 It is important to note, however, that these positive roles should be sought for Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Openness is not synonymous with landscape character or quality.
- 2.14 Paragraph 143 and 144 state that *"inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."*
- 2.15 Paragraphs 145 sets out the types of new buildings that are not inappropriate in the Green Belt:
- a. *"buildings for agriculture and forestry;*
 - b. *appropriate facilities for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
 - c. *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
 - d. *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
 - e. *limited infilling in villages;*
 - f. *limited affordable housing for local community needs under policies set out in the development plan; and*
 - g. *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - *not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*
 - *Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."*
- 2.16 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:
- a. *"mineral extraction;*
 - b. *engineering operations;*
 - c. *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - d. *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - e. *material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and*
 - f. *development brought forward under a Community Right to Build Order."*

Planning Practice Guidance

- 2.17 The NPPF's Green Belt policies are supplemented by additional planning practice guidance. The guidance sets out some of the factors that can be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations born out through specific case law judgements. The guidance states openness is capable of having both spatial and visual aspects⁸. Other circumstances which have the potential to affect judgements on the impact of development on openness include the duration of development and its remediability to the equivalent, or an improved state of, openness, and the degree of activity likely to be generated by development, such as traffic.
- 2.18 The guidance also elaborates on Paragraph 138 of the NPPF which requires local planning authorities 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 the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:
- *“new or enhanced green infrastructure;*
 - *woodland planting;*
 - *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
 - *improvements to biodiversity, habitat connectivity and natural capital;*
 - *new or enhanced walking and cycle routes; and*
 - *improved access to new, enhanced or existing recreational and playing field provision.”*
- 2.19 Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.
- 2.20 Neither the NPPF or the National Planning Practice Guidance (NPPG) provide any specific advice regarding a methodology for undertaking Green Belt reviews, and no reference is made to different scales of review.

Other Relevant Guidance and Case Law

Planning Advisory Service Guidance

- 2.21 Whilst neither the NPPF nor NPPG provide guidance on how to undertake Green Belt reviews, the Planning Advisory Service (PAS) has published an advice note that discusses some of the key issues associated with assessing Green Belt.

⁸ Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section below.

- 2.22 The PAS Guidance⁹ considers the way in which the five purposes of Green Belt should be addressed, as follows:
- **Purpose 1:** To Check the Unrestricted Sprawl of large built-up areas – this should consider the meaning of the term ‘sprawl’ and how this has changed from the 1930s when Green Belt was conceived.
 - **Purpose 2:** To Prevent Neighbouring Towns from merging into one another – assessment of this purpose will be different in each case and a ‘scale rule’ approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged.
 - **Purpose 3:** To assist in safeguarding the countryside from encroachment – the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
 - **Purpose 4:** Preserving the Setting and Special Character of Historic Towns – this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside.
 - **Purpose 5:** To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.
- 2.23 It also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.
- 2.24 The guidance goes on to list 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:
- land partially enclosed by development, i.e. where new development would effectively be ‘infill’ development;
 - land where development would be well contained by the landscape;
 - land where harm to the qualities that contributed to the distinct identity of separate settlements would be limited; and,
 - a strong boundary could be created with a clear distinction between ‘town’ and ‘country’.
- 2.25 The Planning Advisory Service has since updated their ‘Plan Making Question and Answer’ advice with regard to the assessment of Green Belt within Local Plans¹⁰. The service advises that Green Belt Reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology.

Planning Inspectorate Local Plan Examination Reports

- 2.26 Since the adoption of the National Planning Policy Framework in March 2012, there have been several important Planning Inspectorate Local Plan Examination Reports which have informed Green Belt planning¹¹. These include:
- The Inspector’s preliminary conclusions (S Emerson) to Bath and North East Somerset Council (June 2012) highlighted the importance of having an *“up-to-date and comprehensive review of the Green Belt in the district is necessary to see whether all the land so designated fulfils the Green Belt purposes”*.

⁹ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

¹⁰ Planning Advisor Service (2014) PAS Good Plan Making Guide: Principle 2 – Q: When should you carry out a Green Belt Review? Available at: www.local.gov.uk/good-plan-making-guide.

¹¹ Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

- The Inspector's report (A Thickett) to Leeds City Council (September 2014) emphasised that Green Belt studies should be *"fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations"*, i.e. Green Belt reviews should be 'comprehensive' rather than 'selective'.
- The Inspector's interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted several flaws in the approach to the Council's Green Belt assessment:
 - Contribution to the Green Belt purpose were not the only factors used to inform the assessment, land ownership, availability and deliverability were also considered, weighting overall Green Belt judgements against the purposes of the designation.
 - The Green Belt was divided-up in to assessment parcels inconsistently: large areas were assessed in the same way as small sites and some areas of Green Belt were not assessed.
 - Green Belt purposes 4 and 5 were not assessed.
 - The Council's two stage Green Belt assessment update, involving an initial assessment of large general areas followed by smaller parcels for the five Green Belt purposes, was subsequently approved by the Inspector. However, the Inspector emphasised the need for consistency and transparency: *"This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements."*
 - With regard to the assessment of Purpose 4 the Inspector commented that *"the assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant"*.
 - With regard to the assessment of Purpose 5 which focussed on the area of brownfield land within the settlement nearest to the Green Belt land under assessment, the Inspector found the approach to be *"consistent, transparent and proportionate."*
- The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation.
- The Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear *"how the assessment of 'importance to Green Belt' has been derived"* from assessments against the individual purposes of Green Belt and highlighted the importance of revisions to Green Belt boundaries to *"take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process."*
- The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) found that the Phase 1 Green Belt assessment was too strategic to draw out finer grained variations in Green Belt performance and Phase 2 of the review, although more detailed, failed to assess all potential development sites and did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels. The Inspector noted the Green Belt review had incorrectly incorporated an examination of landscape character into the consideration of openness, which *"should only be concerned about the absence of built development and other dominant urban influences"*.

- The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) supported the Council's decision not to assess the Borough's Green Belt against Purpose 4 on the grounds that there are no historic towns in the Borough. The Inspector also noted that contribution to Purpose 5 had not been assessed because all brownfield sites with reasonable prospects of development had been identified. The Inspector concluded that this reasoning was *"flawed as a matter of principle because the aims of the Green Belt are long-term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites"*.

High Court and Court of Appeal Judgements

2.27 Since the adoption of the National Planning Policy Framework in March 2012, there have been several important High Court and Court of Appeal judgements that have informed general interpretation of national Green Belt policy¹². These include:

- *Heath & Hampstead Society v Camden LBC & Vlachos (2008)* concerned a proposal to demolish an existing residential building on Metropolitan Open Land and replace it with a new, larger building which represented a spatial intrusion upon the openness of the MOL but which did not intrude visually on that openness. The Inspector concluded that *"while it may not be possible to demonstrate harm by reason of visual intrusion as a result of an individual – possibly very modest – proposal, the cumulative effect of a number of such proposals, each very modest in itself, could be very damaging to the essential quality of openness of the Green Belt and Metropolitan Open Land"*. Although the case related to previous policy in relation to the Green Belt as set out in Planning Policy Guidance 2 (PPG 2), this portion of the judgement was cited in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (see below) as relevant guidance in relation to the concept of openness of the Green Belt in the NPPF.

- *Calverton Parish Council v Greater Nottingham Councils & others (2015)* indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent':

"the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent."

- *Timmins and Lymn Family Funeral Service v Gedling Borough Council and Westerleigh Group Limited (2015)* clarifies that any material change of use of land in the Green Belt generally (and the use of land as a cemetery in particular) should be regarded as inappropriate unless listed in paragraphs 89 and 90 of the NPPF.
- *Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)* was a Court of Appeal judgement following a previous high court judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The case was dismissed by the Court of Appeal, but the judgement concluded that:
 - *"openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents"*

¹² Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

- *“The question of visual impact is implicitly part of the concept of ‘openness of the Green Belt’ as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to checking ‘the unrestricted sprawl of large built-up areas’ and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and ‘safeguarding the countryside from encroachment’ includes preservation of that quality of openness. The preservation of ‘the setting... of historic towns’ obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields.”*
- *“The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there.”*
- Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016) found that glasshouse development in the Green Belt is appropriate since it is a ‘building for agriculture’ under the first bullet of paragraph 89 of the NPPF and therefore not capable of generating harm to the Green Belt designation.
- Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a six hectare quarry extension in the Green Belt. Although paragraph 90 of the NPPF states that mineral extraction is not inappropriate development in the Green Belt, the Council failed to take into account visual impacts when considering whether the proposal would *“preserve the openness of the Green Belt”* as required in paragraph 90 of the NPPF. Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council's own assessment of the likely effects of the development on the landscape, visual impact on openness was *“quite obviously”* relevant to its effect on the openness of the Green Belt. 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”*.

Origins of the West Midlands Green Belt

- 2.28 Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955¹³. The Green Belt was not formally approved by the Secretary of State until 1975. Today the Green Belt covers over 900 square miles, surrounding the Black Country, Coventry, Birmingham and Solihull, with its edge lying between 6 and 15 miles from the built up area of the conurbation.
- 2.29 The Green Belt has remained relatively successful in checking the sprawl of Birmingham, the City of Wolverhampton, and Coventry, preventing the merging of settlements and encroachment into the surrounding countryside, helping to preserve the setting and special character of the constellation of satellite settlements that inhabit it. At a strategic level, the Green Belt, tightly drawn around settlements, has helped to encourage regeneration by directing development to brownfield sites within the major urban areas. However, some pockets of Green Belt at the urban fringe have been compromised and degraded by infrastructure projects such as roads and power lines, and other urban intrusions¹⁴.

¹³ Campaign to protect Rural England: West Midlands (June 2007) What Price West Midlands Green Belts? Available at: www.cprewm.org.uk/resources/housing-and-planning/green-belts/item/2220-what-price-west-midlands-green-belts.

¹⁴ Campaign to protect Rural England: West Midlands (June 2007) What Price West Midlands Green Belts? Available at: www.cprewm.org.uk/resources/housing-and-planning/green-belts/item/2220-what-price-west-midlands-green-belts.

The Black Country Green Belt

- 2.30 The Black Country Green Belt comprises a relatively narrow fringe of countryside within its boundaries to the north, south, and west of the urban area (with more extensive areas of Green Belt lying beyond to the north and west in South Staffordshire), and larger areas within the eastern parts of Sandwell and Walsall boroughs. There is also a network of green wedges and corridors which are designated as Green Belt, and act to bring the countryside into the heart of the built up area.
- 2.31 No Black Country-wide Green Belt review has taken place since it was designated in the 1970s. The former West Midlands County Council prepared a Green Belt Subject Plan in the 1980s to define the Green Belt boundary shown diagrammatically on the 1984 Structure Plan Key Diagram. However, as the Green Belt Subject Plan was never formally adopted, the Green Belt boundary was defined and reviewed incrementally through local plans such as the Aldridge and Brownhills Local Plan 1986, the Barr Beacon and Sandwell Valley Countryside and Recreation Local Plan 1986, and the subsequent Unitary Development Plans prepared by the Black Country Authorities.
- 2.32 The adopted Black Country Core Strategy (2011) concluded that all development needs to 2026 could be met within the existing urban area. However, the Black Country Urban Capacity Review published in May 2018¹⁵ states that:
- “ Given the urban capacity evidence summarised above, it is reasonable to conclude that the exceptional circumstances necessary to trigger a green belt review in the Black Country, in order to meet housing and employment land needs have been met. This will be informed in the first instance by the recently published Birmingham and Black Country HMA Strategic Growth Study.”*
- 2.33 It is noted that the May 2018 Urban Capacity Review is ‘work in progress’ and the information contained in it is being reviewed and updated to cover the plan period.
- 2.34 Using the Green Belt statistics published by the Ministry of Housing, Communities & Local Government in 2018¹⁶, **Table 2.1** outlines the total amount of Green Belt within each of the Black Country Local Authorities.

Table 2.1: Green Belt land within each of the Black Country Local Authorities¹⁷

Local Authority	Green Belt Land within each authority	Percentage of land covered by Green Belt within each authority	Percentage of Green Belt Land in England within each Authority ¹⁸
City of Wolverhampton	800ha	11.5%	0.05%
Dudley	1,770ha	18.1%	0.11%
Sandwell	820ha	9.6%	0.05%
Walsall	3,940ha	37.9%	0.24%

¹⁵ Black Country Councils (2018) Black Country Urban Capacity Review. Available at:

blackcountrycorestrategy.dudley.gov.uk/EasysiteWeb/getresource.axd?AssetID=318915&type=full&servicetype=Attachment.

¹⁶ Ministry of Housing, Communities & Local Government (2018) Local authority green belt statistics for England: 2017 to 2018. Available at: www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2017-to-2018.

¹⁷ Ministry of Housing, Communities & Local Government (2018) Local authority green belt statistics for England: 2017 to 2018. Available at: www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2017-to-2018.

¹⁸ Total area of Green Belt land within England in 2017/2018 according to the Green Belt statistics published by the Ministry of Housing, Communities & Local Government is 1,629,510ha.

Local Planning Policy

The Black Country Core Strategy

- 2.35 Adopted in 2011, the Black Country Core Strategy sets out the overall strategy for the Black Country until 2026 and explains how the local authorities of the City of Wolverhampton, Dudley, Sandwell and Walsall will deliver the spatial aspects of the vision for the sub-region, as well as how regional and national policies will be applied locally.
- 2.36 The Core Strategy does not include a specific Green Belt policy, however references to the Green Belt are identified in policies CSP2: Development Outside the Growth Network, which states that the Green Belt will be maintained and protected from inappropriate development, policy ENV2: Historic Character and Local Distinctiveness, which states that development should protect and promote historic character and local distinctiveness, and policy ENV6: Open Space, Sport and Recreation, which states that local authorities will make more efficient use of land by providing opportunities to increase appropriate open space, sport and recreation use of the Green Belt. In addition, policies WM4: Locational Considerations for New Waste Management Facilities and policy MIN1: Managing and Safeguarding Mineral Resources outline key considerations and restrictions on the preferred location of mineral extraction sites and open air facilities on land designated as Green Belt.
- 2.37 The Black Country Core Strategy Policy CSP2 states that 'Green Belt boundaries will be maintained and protected from inappropriate development' over the plan period to 2026. The plans sitting beneath the Core Strategy therefore cannot make changes to the Green Belt boundary and have not attempted to do so.

City of Wolverhampton Development Plan

- 2.38 The Wolverhampton Development Plan is formed of a number of documents including:
- The Black Country Core Strategy, adopted 2011.¹⁹
 - Unitary Development Plan, adopted 2006.²⁰
- 2.39 These documents are supported by a number of Area Action Plans, Supplementary Planning Documents and Development Briefs.

Unitary Development Plan (UDP)

- 2.40 Following the adoption of the Black Country Core Strategy, certain policies in the UDP have been replaced, and others have been amended. The updated UDP included a number of additional sites for the Proposals Map.
- 2.41 The UDP set out Green Belt protectionist policies, which include policies G1: Protection of the Green Belt, G2: Control of Development in the Green Belt, G3: Control of Development Conspicuous in the Green Belt, G4: Major Development Sites in the Green Belt, G5: Access to the Green Belt and G6: Northcote Country Park Farm.

¹⁹ Black Country Councils (2011) Black Country Core Strategy. Available at: blackcountrycorestrategy.dudley.gov.uk/t4/p2/?assetdet13950554=198681.

²⁰ City of Wolverhampton Council (2006) Unitary Development Plan. Available at: www.wolverhampton.gov.uk/article/2408/Unitary-Development-Plan-UDP-and-Proposals-Map.

Dudley Borough Development Plan

- 2.42 The Dudley Development Plan is formed of a number of documents including:
- The Black Country Core Strategy, adopted 2011.²¹
 - Dudley Borough Development Strategy, adopted 2017.²²
- 2.43 These documents are supported by a number of Area Action Plans, Conservation Area Appraisals and Management Plans and Supplementary Planning Documents, including the 2016 Nature Conservation SPD, the 2017 Historic Environment SPA (supported by the Borough-wide Urban Historic Landscape Characterisation (UHLC)) and the 2007 Open Space, Sport and Recreation SPD, which is currently being reviewed.

Dudley Borough Development Strategy

- 2.44 The Development Management Plan sets out the day to day planning policies through which development in the Borough will be delivered. This Strategy builds upon the existing work carried out for the Black Country Core Strategy in 2011.
- 2.45 Policy S23 relates to inappropriate development in the Borough of Dudley. The policy states that there shall be presumption against inappropriate development in Dudley's Green Belt. Development proposals for land within the Green Belt will not be permitted except for exceptional circumstances set out in the NPPF or superseding national policy.
- 2.46 Policy S19 also considers the Green Belt as part of the Borough's strategic green infrastructure, requiring the maintenance of a minimum green corridor width of 15m throughout the Green Network, incorporating wildlife corridors and cycle and footpath networks enhancement.

Sandwell Borough Development Plan

- 2.47 The current development plan documents for Sandwell include:
- The Black Country Core Strategy, adopted 2011.²³
 - Site Allocation and Delivery Development Plan Documents 2012.²⁴
- 2.48 These are supported by Area Action Plans.

Site Allocation and Delivery Development Plan

- 2.49 The Site Allocation and Delivery Development Plan document guides future development in the Borough of Sandwell up to 2021. Site Allocation Development Policy (SAD) EOS2 provides a Green Belt Map and an accompanying policy which states that inappropriate development as defined in PPG2 will not be permitted except in very special circumstances, where the harm of development is outweighed by other considerations.

Walsall Borough Development Plan

- 2.50 The Walsall Development Plan is formed of a number of documents, including:
- The Black Country Core Strategy, adopted 2011.²⁵
 - Walsall Site Allocation Document, adopted 2019.²⁶

²¹ Black Country Councils (2011) Black Country Core Strategy. Available at: blackcountrycorestrategy.dudley.gov.uk/t4/p2/?assetdet13950554=198681.

²² Dudley Metropolitan Borough Council (2017) Dudley Borough Development Strategy. Available at: www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/dudley-borough-development-strategy/.

²³ Black Country Councils (2011) Black Country Core Strategy. Available at: blackcountrycorestrategy.dudley.gov.uk/t4/p2/?assetdet13950554=198681.

²⁴ Sandwell Metropolitan Borough Council (2012) The Site Allocations and Delivery Development Plan Document. Available at: www.sandwell.gov.uk/info/200275/planning_and_buildings/676/site_allocations_and_delivery_development_plan_document.

²⁵ Black Country Councils (2011) Black Country Core Strategy. Available at: blackcountrycorestrategy.dudley.gov.uk/t4/p2/?assetdet13950554=198681.

²⁶ Walsall Council (2019) Walsall Site Allocation Document. Available at: go.walsall.gov.uk/site_allocation_document.

- 2.51 These documents are accompanied by the Walsall Town Centre Area Action Plan (AAP), also adopted in January 2019, and a number of Supplementary Planning Documents and Conservation Area Appraisals and Management Plans, as well as the saved policies of the 2011 Unitary Development Plan (UDP).

Walsall Site Allocation Document (SAD)

- 2.52 The purpose of the Site Allocation Document²⁷ is to allocate sites for housing, employment and other land use facilities such as leisure facilities. It also protects land to meet the current and future needs of Walsall.
- 2.53 SAD Policy GB1: Green Belt Boundary and Control of Development in the Green Belt reiterates that there are policies in place which do not permit inappropriate development on Green Belt land. It also states that developments that are not inappropriate or which meet the criteria for 'very special circumstance' developments within the Green Belt will still be assessed against other relevant policies and in terms of their cumulative impact.

Safeguarded Land

- 2.54 Safeguarded land is defined as 'land taken out of the Green Belt that is not used for development within the plan period. Safeguarded land is therefore protected from development proposals arising in the meantime by policies with similar force to Green Belt'.²⁸ Over time, this process ensures that Green Belt boundaries remain fixed. Safeguarded land is closely associated with the identification of Green Belt boundaries, and will therefore be considered as part of the assessment of harm within this study. There is currently no safeguarded land in the Black Country.

Neighbouring Authority Green Belt Reviews

- 2.55 The following table summarises the Green Belt Studies that have been undertaken in Authorities neighbouring the Black Country Green Belt²⁹. It is noted that, at the time of writing, authorities have Local Plan reviews at various stages and that Cannock Chase District Council and Lichfield District Council are due to consult on various documents including possible further Green Belt Reviews.

²⁷ Walsall Council (2019) Walsall Site Allocation Document. Available at: go.walsall.gov.uk/site_allocation_document

²⁸ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues

²⁹ South Staffordshire is not referenced in the summary of neighbouring authority Green Belt Studies, as the South Staffordshire Green Belt Assessment is being undertaken in conjunction with the Black Country Assessment using the same methodology. The reports for these assessments are however being prepared separately.

Table 2.2: Summary of Neighbouring Authority Green Belt Studies.

Authority	Summary of Green Belt Studies
<p>Birmingham City Council</p>	<p>Birmingham City Council undertook a Green Belt Assessment in 2013 to inform the preparation of the new Birmingham Development Plan, determining permanent Green Belt boundaries that can endure for the long term, and setting the framework for Green Belt and settlement policy. The assessment was conducted in three stages: stage 1) a preliminary analysis; stage 2) a detailed analysis of option areas; and stage 3) scoring of shortlisted areas.</p> <p>The purpose of the assessment was to enable the Council to understand how the City's Green Belt land contributes to the fundamental aim, characteristics and purposes of the Green Belt.</p> <p>The preliminary analysis of the City's Green Belt considered four different approaches to meet the growth requirements of Birmingham. These were: a) one large urban extension (around 5,000 homes); b) two large urban extensions (5,000 homes each); c) one large urban extension (around 5,000 homes) and other smaller developments; and d) several smaller dispersed settlements. Of these options, the Council opted for the 'one sustainable urban extension approach' option to allow for housing, community infrastructure and supporting infrastructure during the plan period.</p> <p>Stage two of the assessment provided a detailed assessment of the Green Belt Option Areas, resulting in a shortlist of areas that were progressed for further consideration in Stage 3. These include: Area A1 - bounded by Weeford Road/Hillwood Road and the Area at Hill Wood; East of Watford Gap (Area A2); Area B1 - West of the M6 Toll; North of Tamworth Road and the Area West of the M6 Toll; South of Tamworth Road (Area B2); Area C - West of Sutton Coldfield Bypass, Walmley; and Area D - the Area East of the Sutton Coldfield Bypass, Walmley.</p> <p>Stage three scored the shortlisted areas against a range of criteria and concluded by identifying a number of sites for further consideration for development as a sustainable urban extension.</p>
<p>Bromsgrove District Council</p>	<p>Bromsgrove District Council is in the process of reviewing their District Plan. As part of the preparation for the plan, the Council has committed to undertake a full review of the Green Belt and published the methodology for this assessment in September 2018.</p> <p>The methodology proposes to undertake a Part 1 strategic assessment of the Green Belt involving the assessment of 'strategic parcels' of land, some of which are contiguous with the Green Belt within the Black Country and South Staffordshire. Following this, a Part 2 detailed assessment of the Green Belt is proposed, including the assessment of potential development sites.</p>
<p>Cannock Chase District Council</p>	<p>LUC undertook the Cannock Chase Green Belt Study in 2016 on behalf of Cannock Chase District Council. The Green Belt Study was used to develop a clear understanding of how the land in the Cannock Chase Green Belt performed against the purposes of the Green Belt.</p> <p>The Green Belt Study demonstrated that the majority of the Green Belt in the District continues to serve its purposes very well. There were four sites of Green Belt and non-Green Belt land within the study area where infill development would be well contained by existing features within the landscape. These include parcels of land in: Hednesford Hills, Fair Oak Academy, Rugeley, the southern edge of Norton Canes and the Cannock Extension Canal.</p>

Authority	Summary of Green Belt Studies
<p>Lichfield District Council</p>	<p>Lichfield District Council has undertaken a number of Green Belt Reviews which will inform the preparation of their new Local Plan. This includes a Green Belt Strategic Review (2012), two Green Belt Review Supplementary Reports (2013; 2016), and a Supplementary Report Addendum (2017).</p> <p>The 2012 Review identified that nearly all the Green Belt land parcels are important for some Green Belt purpose. Of the NPPF purposes assessed, protecting the countryside from encroachment is considered a key role in relation to the towns and villages within the Green Belt. The Review found that within the Green Belt, openness had been maintained and there are clear distinctions between settlement boundaries and Green Belt within the District. The Review notes that there are very few cases where the agricultural landscape is broken up by a mixture of uses. Instead, there tends to be a clear boundary where the countryside starts.</p> <p>The 2016 Supplementary Report set out the Local Plan allocations for proposed development on Green Belt land. This included a review of seven main settlements for consideration. Of these sites, the Report recommended that changes to the Green Belt boundary are made adjacent to Burntwood and the St Matthews Estate, Fazeley, Mile Oak and Bonehill, Shenstone and Whittington in order to help fulfil the strategic housing requirements outlined within the adopted Local Plan. The final Supplementary Addendum Report, published in 2017, considered one more additional site which had been omitted from the preceding documents.</p>
<p>Shropshire Council</p>	<p>LUC was appointed by Shropshire Council to prepare a Green Belt assessment within the County. The purpose of this assessment was to provide Shropshire Council with an objective, evidence-based assessment of how the Shropshire Green Belt contributes to the five Green Belt purposes as set out in national policy.</p> <p>The report demonstrated that the majority of the Green Belt in Shropshire contributes to one or more Green Belt purposes. In particular, it helps to maintain the openness in key locations such as between Shifnal, Telford and Albrighton, which helps to protect the separate identity of these settlements. The assessment highlighted that the Green Belt in Shropshire plays a key strategic role in preventing the eastern expansion of Telford and the western expansion of the West Midlands conurbations of the City of Wolverhampton and the Black Country, Birmingham and Coventry. The Assessment noted that many of the development boundaries in Shropshire are tightly drawn around the urban edges of these settlements with little opportunity for further development without encroaching onto Green Belt land.</p> <p>A Stage 2 Green Belt assessment was published in December 2018 which assessed the harm of releasing potential opportunity areas from the Green Belt.</p>
<p>Stafford Borough Council</p>	<p>Stafford Borough Council has not undertaken a review of their Green Belt.</p> <p>Stafford Borough's Local Plan has no specific policy which addresses planning considerations for the Green Belt. Paragraph 2.19 of the Local Plan states that there is no need for the Borough to undertake a review of their Green Belt as they have sufficient land available in locations outside of the Green Belt to meet the needs of the Borough.</p>

Authority	Summary of Green Belt Studies
<p>Wyre Forest District Council</p>	<p>Wyre Forest District Council undertook a Green Belt Review in 2016 to inform the preparation of the new Local Plan. Due to the need for housing and other development, and the limited availability of brownfield sites within the District, other areas for development including the Green Belt needed to be explored in the Review.</p> <p>The Review was divided into two parts. Part one assessed the Green Belt against the five purposes set out in the NPPF. Part two comprised of a site analysis report which assessed potential additions to the Green Belt.</p> <p>The conclusions of the Strategic Review demonstrated that across the District, the Green Belt fulfils its Strategic purpose as part of the West Midlands Green Belt. The part two report identified five strategic allocations where the scale and form of their development is likely to cause significant change to that locality. Therefore the importance of master planning these sites was emphasised, as such large-scale development can bring opportunities for the positive use of the Green Belt, particularly regarding green infrastructure and access to open spaces. This was particularly the case for south-eastern and north-eastern areas of Kidderminster, where, it was suggested, a new boundary between town and country will need to be defined.</p>

3 Definition of Terms

Introduction

- 3.1 The following chapter sets out definition of the key terms and definitions that have framed the Stage 1 and Stage 2 Green Belt assessment.

Factors affecting contribution to Green Belt purposes

- 3.2 As outlined in **Chapter 1**, there are five Green Belt purposes as defined in paragraph 134 of the NPPF. The Green Belt Assessment methodology is based on the NPPF's five purposes and openness as its essential characteristic. As a precursor to the area-based assessment of Green Belt it is necessary to gain a detailed understanding of the functionality of the Green Belt in the study area. **Chapter 2** provides the policy and environmental context for understanding the functionality of Green Belt. This information has directly informed the assessment criteria and the definitions of key terms used in the methodology.
- 3.3 The factors that affect the contribution made by land to each Green Belt purpose are not distinct to each purpose. With the exception of assistance in urban regeneration, all the Green Belt purposes can be seen to require consideration of the relationship between the assessment area, settlements and the countryside as influenced by the following common factors:
- **Development and land use** – the extent and form of existing development, and land use characteristics, affect the degree to which Green Belt can be considered to be part of the countryside rather than an extension of the urban/settled area.
 - **Location** – the position of Green Belt in relation to other distinctive pockets of Green Belt land and settlements can affect its role in relation to the potential expansion of settlements.
 - **Separating features** – physical elements such as woodland blocks, rivers and ridges or areas of primary constraint (e.g. SACs, SSSIs) have a physical and visual impact on settlement-countryside relationships.
 - **Connecting features** – physical elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.
- 3.4 In addition to the five purposes of Green Belt, the NPPF refers to two 'essential characteristics': 'openness' and 'permanence'. Both characteristics are applicable to all assessment criteria. These are defined in more detail below.

Openness

- 3.5 As outlined above, the NPPF identifies openness as an 'essential characteristic' of Green Belt, rather than a function or purpose. Openness is therefore seen as a key element in the assessment of all Green Belt purposes. Land that lacks openness will play less of a role in preventing sprawl, separating towns, preventing countryside encroachment or providing a setting to a historic town.
- 3.6 Three important high court and court of appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) and Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018), define openness as having both a spatial aspect and a visual aspect³⁰.

³⁰ See para. 2.24 above for more details.

- 3.7 **Spatial openness** as a characteristic can be considered in terms of the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt³¹. Similarly, the location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to affect openness. The NPPF lists in paragraph 145 a number of types of buildings that are 'not inappropriate' within the Green Belt. As a matter of law, development such as agriculture and forestry which is appropriate in the Green Belt and is not required to 'preserve the openness' of the Green Belt cannot be considered to impinge on its openness³².
- 3.8 **Visual openness** is important in so far as it relates to the purposes of Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2); openness of aspect is a characteristic quality of the countryside, therefore 'safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting...of historic towns' (Purpose 4) includes visual setting³³. For example, a range of natural and man-made features – topography, vegetation, buildings and linear features such as roads and railways – can contribute to or compromise the visual openness of the Green Belt. A key distinction, however, is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact, this does not diminish the *spatial openness* of the Green Belt.
- 3.9 As noted by the Inspector to the Welwyn Hatfield Borough Council Local Plan Examination (2017) (see **Chapter 2**), openness is not concerned about the character of the landscape, but instead relates to the '**absence of built development and other dominant urban influences**'.

Permanence

- 3.10 Green Belt is a permanent planning designation. Therefore, it is recognised that there are benefits in using features which are clearly defined and which also play a physical or visual role in separating town and countryside to act as Green Belt boundaries.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 3.11 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the Study requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.
- 3.12 For the purpose of this study, it is necessary to define what constitutes a 'large built-up area' within and in close proximity to the City of Wolverhampton, Dudley, Sandwell and Walsall and what is meant by the term 'sprawl'.

The definition of 'large built-up area' for the Black Country Councils

- 3.13 The Green Belt within the study area forms part of the West Midlands Green Belt surrounding the West Midlands conurbation comprising Birmingham, Sutton Coldfield, Solihull, and the City of Wolverhampton, Walsall, West Bromwich, Dudley, Stourbridge and Halesowen. The Green Belt prevents the sprawl of this 'large built-up area' into the surrounding countryside. The West Midlands Green Belt also encircles the City of Coventry and the towns of Cannock and Hednesford, Burntwood, Redditch, Bromsgrove, Kidderminster, Albrighton, Shifnal, Aldridge and Brownhills, and it partly encircles the towns of Rugeley, Lichfield, Tamworth and Bedworth.

³¹ This point is made in the judgement in *Heath & Hampstead Society v London Borough of Camden* (2008); see para. 2.24 above.

³² *Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd* (2016); see para. 2.24 above.

³³ This point is made in the judgement in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (2016); see para. 2.24 above.

- 3.14 There is no definition provided in the NPPF for a large built-up area. While the West Midlands conurbation is made up of a number of settlements, some of considerable size, each often with their own distinct sense of identity, there is a visible continuous urban mass that stretches across the authority areas. All settlements within this main urban area are therefore considered to form part of the large built area in the assessment of Purpose 1.
- 3.15 **Figure 3.1** indicates the area that has been identified as the West Midlands conurbation, which is defined as the main 'large built-up area' to which Purpose 1 relates. It includes those settlement areas deemed close enough to the 'core' urban area for development associated with them to be considered to be part of the 'large built-up area', including the towns of Aldridge and Brownhills and other settlements including Pelsall, Rushall, Shelfield, Tettenhall and Perton. There is sufficient contiguity between Cheslyn Hay, Great Wyrley and Cannock and Hednesford for these to be considered a single urban area which, in terms of its overall size, is also large enough to constitute a separate large built-up area.

Definition of 'sprawl'

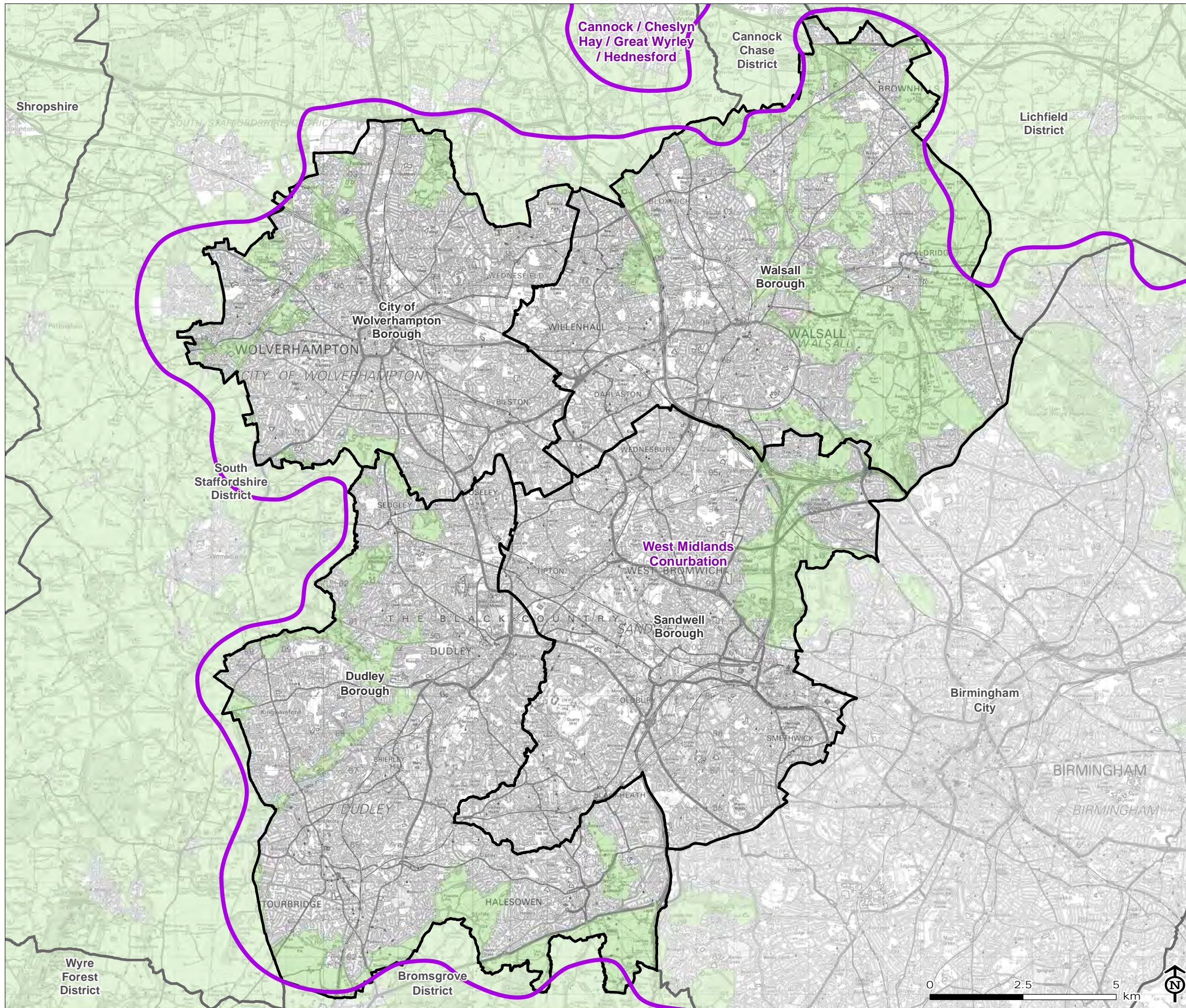
- 3.16 The PAS guidance states in relation to Purpose 1:

"The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"

- 3.17 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:





"As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."

- 3.18 Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the contribution land makes to preventing sprawl in a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.

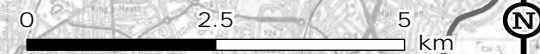


Black Country Green Belt Study

Figure 3.1: Settlements within the Large Built-Up Area Under Purpose 1 - Checking the Unrestricted Sprawl of Large Built-Up Areas

-  Black Country Local Authorities
-  Other Local Authority
-  Green Belt
-  Large built-up area

For the purposes of the Green Belt assessment, all settlements / built up areas within the thick purple line form part of the large built up area, rather than all land within that line.



Map Scale @A3: 1:100,000

Purpose 2: To prevent neighbouring towns from merging into one another

- 3.19 To ensure that the study takes full account of this purpose, it is necessary to define what constitutes a 'town' within and in close proximity to the Black Country Councils, and what is meant by the term 'merging'.

Definition of 'towns' in The Black Country and Neighbouring Authorities

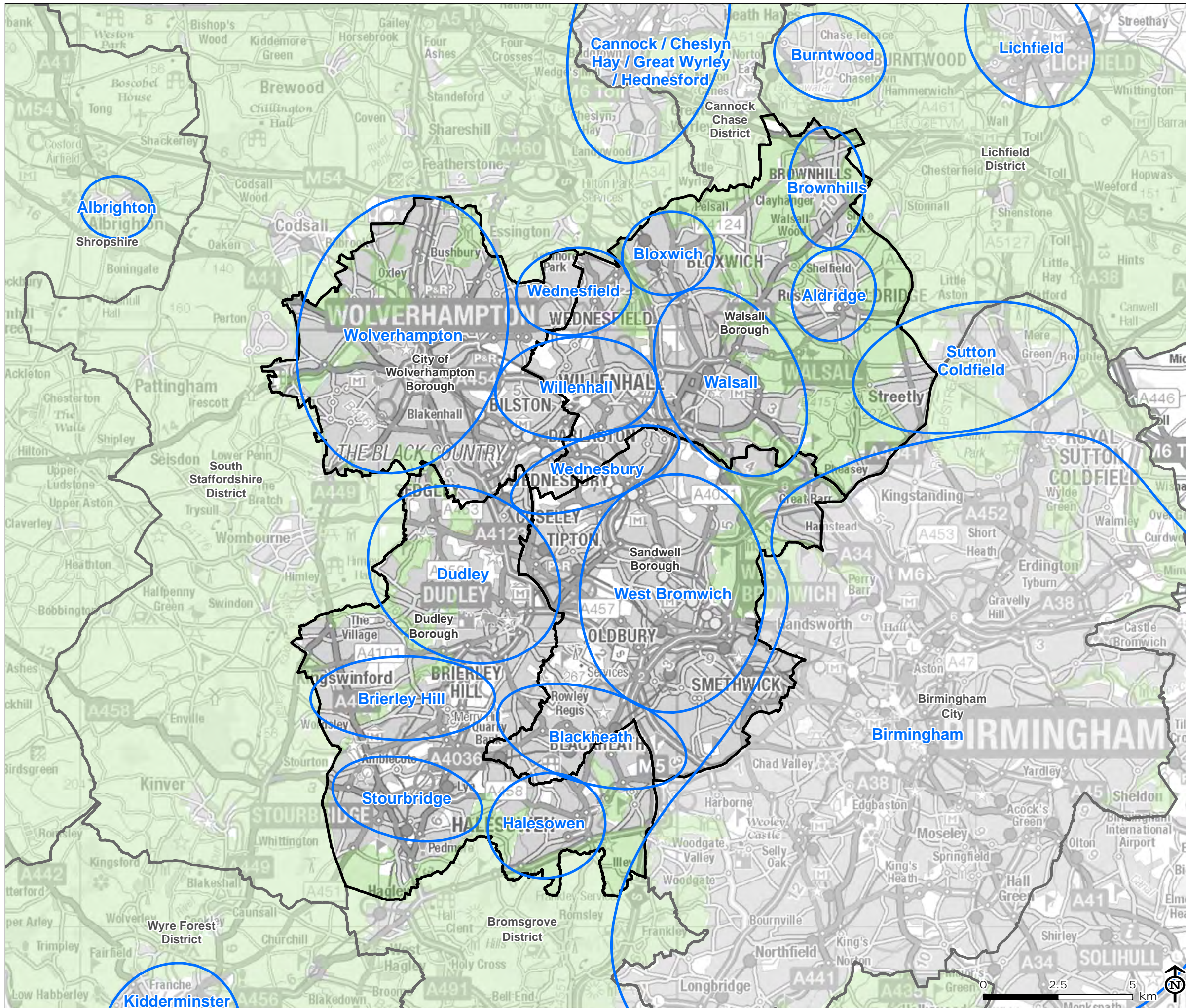
- 3.20 **Table 3.1** lists settlements defined as 'towns' for the Purpose 2 assessment. Those within the Black Country were included on the basis that they are recognised as 'strategic centres' or 'town centres' within the settlement hierarchies section of the Black Country Core Strategy (2011). However, settlements within that hierarchy that are entirely contained within other urban areas, and so lack a direct visual or spatial relationship with the Green Belt, have been omitted (e.g. Cape Hill, Oldbury). Towns outside the Black Country but within close proximity to the study area that have been identified as towns for Purpose 2 are also included in the table. **Figure 3.2** shows the locations of settlements identified as towns in terms of Green Belt Purpose 2.

Table 3.1: Settlements defined as Towns for Purpose 2

Local Authorities	Towns	Neighbouring Authorities and Relevant Towns	
City of Wolverhampton Council	<ul style="list-style-type: none"> Wolverhampton Wednesfield 	South Staffordshire District Council	<ul style="list-style-type: none"> Cheslyn Hay and Great Wyrley, as merged with Cannock and Hednesford
Walsall Borough Council	<ul style="list-style-type: none"> Walsall Bloxwich Brownhills Aldridge Willenhall 	Cannock Chase District Council	<ul style="list-style-type: none"> Cannock and Hednesford
		Lichfield District Council	<ul style="list-style-type: none"> Burntwood Lichfield
		Birmingham City Council	<ul style="list-style-type: none"> Birmingham Sutton Coldfield
		South Staffordshire District Council	<ul style="list-style-type: none"> Cheslyn Hay and Great Wyrley, as merged with Cannock and Hednesford
Sandwell Borough Council	<ul style="list-style-type: none"> West Bromwich Blackheath Wednesbury 	Birmingham City Council	<ul style="list-style-type: none"> Birmingham
Dudley Borough Council	<ul style="list-style-type: none"> Brierley Hill Dudley Stourbridge Halesowen 	Birmingham City Council	<ul style="list-style-type: none"> Birmingham
		Bromsgrove District Council	<ul style="list-style-type: none"> None relevant
		South Staffordshire District Council	<ul style="list-style-type: none"> Cheslyn Hay and Great Wyrley, as merged with Cannock and Hednesford





- 3.21 The District of South Staffordshire classes all its settlements as villages, and therefore does not have any towns within its area boundary. The South Staffordshire adopted Core Strategy³⁴ classifies the following settlements as the most significant settlements (termed Village Centres) within the settlement hierarchy: Bilbrook, Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkridge, Perton and Wombourne. However, as noted in **Table 3.1**, Cheslyn Hay and Great Wyrley are sufficiently close to Cannock and Hednesford to be considered to constitute part of a town.
- 3.22 In the Black Country (as noted in paragraph 3.15 above) there are not only towns but also other settlements that sit within, or which adjoin the Green Belt, including Pelsall, Rushall, Shelfield, Tettenhall and Perton. It is recognised that the perceived gaps between towns will in turn be affected by the size of gaps associated with smaller, intervening settlements. Full account is therefore taken of the role that smaller settlements play in preventing the merging of 'towns'.
- 3.23 The locations of settlements identified as towns in terms of Green Belt Purpose 2 are indicated on **Figure 3.2**.

³⁴ South Staffordshire Council (2012) Core Strategy. Available at: www.sstaffs.gov.uk/planning/the-adopted-core-strategy.cfm.



**Black Country
Green Belt Study**

Figure 3.2: Settlements Identified as Towns Under Purpose 2 - Preventing the Merging of Neighbouring Towns

-  Black Country Local Authorities
-  Other Local Authority
-  Green Belt
-  Towns



Map Scale @A3: 1:125,000

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.24 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment.
- 3.25 In order to effectively assess the effects of encroachment on countryside, it is important to determine the extent to which Green Belt land:
- contains, or is influenced by urbanising land uses and features;
 - relates to adjacent settlements and to the wider countryside.
- 3.26 Urbanising land uses and features are considered to include any features that diminish openness or compromise the rural character of the countryside.
- 3.27 Paragraphs 145 and 146 of the NPPF and associated case law provide guidance on what land uses and features are considered to be ‘appropriate’ development in the Green Belt (see **Chapter 2**). Appropriate development within the Green Belt cannot, according to case law³⁵, be considered to have an urbanising influence and therefore harm Green Belt purposes.
- 3.28 Care therefore needs to be taken in the assessment to ensure that development which is deemed to be appropriate is not treated as an urbanising influence. However, what is deemed to be appropriate development in the NPPF has to be carefully considered as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriateas long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 3.29 We have therefore exercised caution in the application of what is defined as an appropriate use. It is not possible within a Strategic GB study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut for example buildings for agriculture and forestry are deemed to be appropriate development in absolute terms regardless of whether they preserve the openness or conflict with the GB purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, we have taken a considered view on the extent to which the proposed land use has affected the GB purposes for example by affecting openness, or encroaching on the perception of countryside ie the sense of distinction between the urban area and countryside etc.
- 3.30 The methodology doesn’t distinguish between different ‘degrees’ of countryside beyond considering urban influence, as this would stray into assessing the impact on landscape character. If land further from an urban area is, for example more ‘rural’ and tranquil, this is a landscape sensitivity issue which is considered separately in the landscape sensitivity assessment.

Purpose 4: To preserve the setting and special character of historic towns

- 3.31 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. The purpose makes specific reference to ‘historic towns’ not individual historical assets or smaller settlements such as villages and hamlets.

³⁵ 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.

- 3.32 An extract from Hansard in 1988 clarifies which historic settlements in England were considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge³⁶. Durham has since been added to this list.
- 3.33 For the purpose of this assessment, only elements of the historic environment which relate to the character of historic towns and their wider setting have been considered when assessing Purpose 4. This is supported by the PAS guidance³⁷ which states:
- "This purpose is generally accepted as relating to very few settlements in practice."*
- 3.34 The Greater Birmingham HMA Strategic Growth Study³⁸ assessed the relationship between the Green Belt and historic settlements, identifying areas where the *"Green Belt helps to preserve the setting and character of an historic town."* On this basis, it identified Stratford upon Avon, Kenilworth, Lichfield, Rugeley, Penkridge, Bridgnorth and Bewdley as historic towns. Of these, Stratford upon Avon, Kenilworth, Bewdley and Bridgnorth were not considered further in relation to this study, given their distance from the Black Country and the presence of intervening towns.
- 3.35 Informed by the approaches above, as well as the Historic Landscape Character studies for the area and Green Belt studies for neighbouring authorities, the study therefore considered whether there are any historic towns which have a relationship with the landscape which is important to their setting and special character. It should be noted that presence of historic towns within, and in proximity of the Study area, does not necessarily mean that the Green Belt within the Black Country contributes to their setting and special character.

Black Country

- 3.36 The historic origins of the Black Country's city and towns are acknowledged: many have long histories, some have historic features (e.g. Dudley Castle), and some have a visual relationship with the Green Belt (e.g. Walsall, Aldridge). However, none are considered to have a special character to which its landscape setting makes sufficient contribution to warrant assessment in relation to Purpose 4.

South Staffordshire

- 3.37 While the South Staffordshire Historic Environment Character Assessment³⁹ identifies the settlements of Penkridge, Kinver and Brewood as historic towns which were established as market towns during the medieval period, South Staffordshire is composed of a diverse settlement pattern of villages, with no towns in its settlement hierarchies⁴⁰. Therefore, this study does not identify any historic towns within South Staffordshire for the Purpose 4 assessment.

Cannock Chase

- 3.38 The Green Belt assessment in the neighbouring District of Cannock Chase⁴¹ identified areas of land within that district which contributed to the setting and special character of Cannock and Rugeley. However, no land within the Black Country Green Belt is considered to contribute to the setting and special character of these towns, given the separation and distance involved.

³⁶ Hansard HC Deb 08 November 1988 vol 1 40 c148W 1 48W; referenced in Historic England (2018) Response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3

³⁷ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

³⁸ GL Hearn and Wood plc (2018) Greater Birmingham HMA Strategic Growth Study. Available at: www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study.

³⁹ Staffordshire County Council (2011) Historic Environment Character Assessment: South Staffordshire. Available at: www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Environment-Assessments.aspx#SouthStaffsHEA.

⁴⁰ South Staffordshire Council (2012) Core Strategy. Available at: www.staffs.gov.uk/planning/the-adopted-core-strategy.cfm.

⁴¹ LUC (2016) Cannock Chase Green Belt Study. Available at: www.cannockchasedc.gov.uk/content-z-tags/evidence-base

Lichfield

- 3.39 The cathedral city of Lichfield has been identified as a historic town and it does have a relationship with its landscape setting which contributes to its special character. The city is contained within a dip of lower land, and there are views of the historic core and cathedral from the surrounding area⁴². Views of the cathedral spires are available from a wider area, including from higher ground. However, it is considered that land within the Black Country Green Belt, including north eastern parts of Walsall Borough, is too distant to make more than a weak contribution to its setting or special character in Green Belt terms.

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

- 3.40 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that one parcel of Green Belt land makes a higher contribution to encouraging re-use of urban land than another. The PAS guidance states:
- “...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.”*
- 3.41 In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.
- 3.42 However, the examination reports of some planning inspectors, e.g. Cheshire East Council's Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting. It is also important to consider local circumstances in relation to brownfield land, before concluding whether all land should be rated equally against Purpose 5.
- 3.43 Since the publication of the PAS Guidance and the Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development, where sites are over 0.25ha. Together, these registers provide an overview and estimate of the available brownfield land within individual authority areas for housing. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – a Housing and Economic Land Availability Assessment (HELAA). However, the HELAA is not required to identify whether land is previously developed.
- 3.44 The Boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton latest Brownfield Land Registers have been used to estimate the area of brownfield land which is suitable and available for housing development within the urbanised⁴³ areas of the Study Area within the next Plan period.

⁴² Lichfield City Conservation Area Appraisal (2008). Available at: <https://www.lichfielddc.gov.uk/Council/Planning/Conservation-and-listed-buildings/Conservation-areas.aspx>

⁴³ The urbanised area constitutes land within the Borough which does not fall within the Green Belt.

- 3.45 The Brownfield Registers for Dudley Borough⁴⁴, Walsall Borough⁴⁵, Sandwell Borough⁴⁶ and the City of Wolverhampton Council⁴⁷ contain a record of 862.22ha of brownfield land which is suitable and available for housing within the Black Country. However, this does not include brownfield land which may be suitable for employment and other uses.

Table 3.2: Brownfield Land Register for each Local Authority

Local Authority:	City of Wolverhampton Council ⁴⁸	Walsall Borough Council ⁴⁹	Dudley Borough Council ⁵⁰	Sandwell Borough Council ⁵¹
Total area (ha) in Brownfield Registers	311.27	62.42	57.69	454.84

- 3.46 The adopted Black Country Core Strategy (2011) states in Policy HOU1 that over 95% of housing development will be built on previously developed land, including within a series of regeneration corridors (over a plan period of 2006-2026).
- 3.47 Given the importance of continuing to regenerate existing urban areas within the Black Country, as set out in the Core Strategy, and evidenced by the brownfield land registers, it is clear that the Green Belt has had, and will continue to play an important role in encouraging the recycling of derelict and other previously developed land within the urban area. However, whilst it can be concluded that all of the Green Belt land within the Black Country makes a contribution to Purpose 5, it is not possible to determine on a parcel by parcel basis, which areas of Green Belt are playing a stronger or more moderate role with respect to Purpose 5.

⁴⁴ Dudley Borough Council (2017) Brownfield Register. Available at: www.dudley.gov.uk/resident/planning/brownfield-land-register/?entryid235=307581.

⁴⁵ Walsall Borough Council (2018) Brownfield Register. Available at: go.walsall.gov.uk/environment/planning/planning_policy/local_plans/housing_land_supply.

⁴⁶ Sandwell Borough Council (2018) Brownfield Register. Available at: www.sandwell.gov.uk/downloads/download/2062/sandwell_brownfield_register.

⁴⁷ Wolverhampton City Council (2019) Wolverhampton Housing Sites with Brownfield Register - Brownfield Register 2019. Available at: www.wolverhampton.gov.uk/article/2423/Housing-Site-Information.

⁴⁸ Wolverhampton City Council (2019) Wolverhampton Housing Sites with Brownfield Register - Brownfield Register 2019. Available at: www.wolverhampton.gov.uk/article/2423/Housing-Site-Information.

⁴⁹ Walsall Borough Council (2018) Brownfield Register. Available at: go.walsall.gov.uk/environment/planning/planning_policy/local_plans/housing_land_supply.

⁵⁰ Dudley Borough Council (2017) Brownfield Register. Available at: www.dudley.gov.uk/resident/planning/brownfield-land-register/?entryid235=307581.

⁵¹ Sandwell Borough Council (2018) Brownfield Register. Available at: www.sandwell.gov.uk/downloads/download/2062/sandwell_brownfield_register.

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 the Black Country.
- 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 inset⁵² villages. If any significant areas of washed-over⁵³ 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;
 - 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.

⁵² 'Inset' development is development that is surrounded by Green Belt land but is not itself located within the Green Belt designation.

⁵³ 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 a weak or no contribution to the purpose.

Purpose 1 Assessment Criteria

- 4.8 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). **Figure 3.1** indicates which settlements lie within large built-up areas. All of the development forms noted in the RTP1 note (see **para 3.17**) have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF⁵⁴).
- 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)?

⁵⁴ 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	<p>Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or</p> <p>land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.</p>
Weak/No Contribution	<p>Land which is not located within a gap between towns; or</p> <p>land which plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or</p> <p>land which plays no significant role due to the extent of development; or</p> <p>land forming a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).</p>

Purpose 3 assessment criteria

- 4.18 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
- i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses.
 - 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	
<p>Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution.</p> <p>Separating features: land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.</p> <p>Connecting features: an absence of physical features to link settlement and countryside means that land makes a stronger contribution.</p>	
Strong Contribution	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms ⁵⁵) and which does not have a stronger relationship with the urban area than with the wider countryside.
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.

⁵⁵ 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.

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

- 4.27 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 urban areas within the Black Country, as set out in the Core Strategy and targeted through identified regeneration areas, the significant area of brownfield land within the Black Country, and the location of the Black Country authorities within the same Housing Market Area, it is concluded that all Green Belt land within the Black Country 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

- 4.28 The Stage 1 outputs are discussed in **Chapter 5**. Maps illustrating the assessed variations in contribution for each purpose across the Black Country 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.
- 4.29 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.

5 Stage 1 Findings

Introduction

- 5.1 The primary aim of the Stage 1 assessment was to establish the variation in the contribution of designated land to achieving Green Belt purposes. Based on the assessment definitions and criteria outlined in **Chapters 3 and 4**, a review of the contribution of Green Belt land to each of the Green Belt purposes was undertaken, drawing out spatial variations in the contribution of Green Belt land to each Green Belt purpose. This chapter summarises the findings of the Stage 1 assessment.

Key Findings

- 5.2 **Figure 5.1-Figure 5.4(a-d)** illustrate the assessed variations in contribution across the Study Area for each of the first four purposes. The colours used in the figures correspond with the rating colours used in **Table 4.2-Table 4.5** in **Chapter 4**. The four maps were overlaid so that the resulting boundaries reflect changes in contribution to any of those Green Belt purposes, and therefore distinguish parcels of land in which the contribution to the four purposes is the same. This process has resulted in the definition of 140 parcels of varying sizes, which are illustrated in **Figure 5.5(a-d)**. **Table 5.1** provides a summary of the contribution ratings for each parcel to each of the first four NPPF Green Belt purposes.
- 5.3 **Appendix 2** sets out the justification for the Stage 1 ratings in relation to each of the Stage 1 assessment parcels, for each of the NPPF purposes. As explained in **Chapter 4**, all parcels are considered to perform strongly against purpose 5.

Table 5.1: Assessment of Contribution Ratings for Each Parcel

Parcel No	Authority	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
B1	City of Wolverhampton	7.3	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B2	City of Wolverhampton	2.2	Strong	Moderate	Strong	Weak / No contribution
B3	City of Wolverhampton	8.3	Moderate	Moderate	Strong	Weak / No contribution
B4	City of Wolverhampton	5.1	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B5	City of Wolverhampton	153.4	Strong	Moderate	Strong	Weak / No contribution
B6	City of Wolverhampton	14.9	Moderate	Moderate	Moderate	Weak / No contribution
B7	City of Wolverhampton	44.9	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B8	City of Wolverhampton	79.4	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B9	City of Wolverhampton	45.3	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B10	City of Wolverhampton	17.1	Moderate	Moderate	Moderate	Weak / No contribution
B11	City of Wolverhampton	0.6	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B12	City of Wolverhampton	81.1	Strong	Weak / No contribution	Strong	Weak / No contribution
B13	City of Wolverhampton	1.9	Moderate	Weak / No contribution	Moderate	Weak / No contribution

Parcel No	Authority	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
B14	City of Wolverhampton	64.7	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B15	City of Wolverhampton	79.6	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B16	City of Wolverhampton	46.5	Moderate	Weak / No contribution	Weak / No contribution	Weak / No contribution
B17	City of Wolverhampton	9.9	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B18	City of Wolverhampton	0.3	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B19	City of Wolverhampton	0.6	Moderate	Weak / No contribution	Strong	Weak / No contribution
B20	City of Wolverhampton	1.2	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B21	City of Wolverhampton	7.7	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B22	City of Wolverhampton	9.7	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B23	City of Wolverhampton	8.1	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B24	City of Wolverhampton	4.9	Strong	Weak / No contribution	Strong	Weak / No contribution
B25	City of Wolverhampton	3.1	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B26	City of Wolverhampton	0.5	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B27	City of Wolverhampton	1.5	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B28	City of Wolverhampton	6.9	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B29	City of Wolverhampton	16.4	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B30	City of Wolverhampton	72.3	Strong	Moderate	Strong	Weak / No contribution
B31	City of Wolverhampton	0.5	Moderate	Moderate	Moderate	Weak / No contribution
B32	City of Wolverhampton	0.9	Moderate	Moderate	Moderate	Weak / No contribution
B33	City of Wolverhampton	4.4	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B34	Dudley	8.8	Moderate	Weak / No contribution	Strong	Weak / No contribution
B35	Dudley	1.0	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B36	Dudley	5.8	Strong	Moderate	Strong	Weak / No contribution
B37	Dudley	4.4	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B38	Dudley	34.7	Moderate	Moderate	Moderate	Weak / No contribution
B39	Dudley	54.9	Weak / No contribution	Moderate	Moderate	Weak / No contribution
B40	Dudley	110.3	Strong	Moderate	Strong	Weak / No contribution
B41	Dudley	6.5	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B42	Dudley	5.3	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B43	Dudley	1.4	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B44	Dudley	8.8	Strong	Moderate	Strong	Weak / No contribution
B45	Dudley	62.7	Strong	Weak / No contribution	Strong	Weak / No contribution

Parcel No	Authority	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
B46	Dudley	138.4	Moderate	Moderate	Moderate	Weak / No contribution
B47	Dudley	10.5	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B48	Dudley	10.2	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B49	Dudley	28.1	Strong	Weak / No contribution	Strong	Weak / No contribution
B50	Dudley	9.4	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B51	Dudley	60.1	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B52	Dudley	9.0	Moderate	Weak / No contribution	Weak / No contribution	Weak / No contribution
B53	Dudley	53.3	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B54	Dudley	8.5	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B55	Dudley	3.3	Moderate	Weak / No contribution	Strong	Weak / No contribution
B56	Dudley	2.0	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B57	Dudley	3.9	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B58	Dudley	3.1	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B59	Dudley	14.8	Strong	Moderate	Strong	Weak / No contribution
B60	Dudley	181.3	Strong	Moderate	Strong	Weak / No contribution
B61	Dudley	71.6	Strong	Weak / No contribution	Strong	Weak / No contribution
B62	Dudley	11.2	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B63	Dudley	1.1	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B64	Dudley	4.2	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B65	Dudley	302.0	Strong	Moderate	Strong	Weak / No contribution
B66	Dudley	2.2	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B67	Dudley	7.2	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B68	Dudley	1.4	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B69	Dudley	2.3	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B70	Dudley	2.7	Moderate	Moderate	Moderate	Weak / No contribution
B71	Dudley	336.6	Strong	Moderate	Strong	Weak / No contribution
B72	Dudley	65.1	Moderate	Moderate	Strong	Weak / No contribution
B73	Dudley	1.5	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B74	Dudley	113.5	Moderate	Moderate	Moderate	Weak / No contribution
B75	Dudley	3.7	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B76	Sandwell	515.3	Strong	Strong	Strong	Weak / No contribution
B77	Sandwell	11.4	Moderate	Weak / No contribution	Moderate	Weak / No contribution

Parcel No	Authority	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
B78	Sandwell	114.3	Moderate	Strong	Moderate	Weak / No contribution
B79	Sandwell	23.0	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B80	Sandwell	26.6	Weak / No contribution	Strong	Moderate	Weak / No contribution
B81	Sandwell	71.7	Moderate	Strong	Moderate	Weak / No contribution
B82	Sandwell	5.8	Moderate	Moderate	Moderate	Weak / No contribution
B83	Sandwell	19.5	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B84	Sandwell	4.9	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B85	Sandwell	4.9	Moderate	Moderate	Moderate	Weak / No contribution
B86	Sandwell	25.5	Moderate	Moderate	Moderate	Weak / No contribution
B87	Walsall	14.8	Weak / No contribution	Moderate	Moderate	Weak / No contribution
B88	Walsall	74.2	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B89	Walsall	42.7	Moderate	Strong	Moderate	Weak / No contribution
B90	Walsall	27.4	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B91	Walsall	10.4	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B92	Walsall	2.6	Moderate	Moderate	Moderate	Weak / No contribution
B93	Walsall	1,768.3	Strong	Strong	Strong	Weak / No contribution
B94	Walsall	12.8	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B95	Walsall	8.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B96	Walsall	61.3	Moderate	Strong	Moderate	Weak / No contribution
B97	Walsall	2.8	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B98	Walsall	32.4	Moderate	Moderate	Moderate	Weak / No contribution
B99	Walsall	5.9	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B100	Walsall	5.3	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B101	Walsall	3.5	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B102	Walsall	5.9	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B103	Walsall	220.6	Strong	Moderate	Strong	Weak / No contribution
B104	Walsall	62.3	Strong	Moderate	Strong	Weak / No contribution
B105	Walsall	52.5	Strong	Strong	Strong	Weak / No contribution
B106	Walsall	1.9	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B107	Walsall	43.7	Strong	Weak / No contribution	Strong	Weak / No contribution
B108	Walsall	10.8	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B109	Walsall	90.4	Strong	Weak / No contribution	Strong	Weak / No contribution

Parcel No	Authority	Parcel Area (ha)	Purpose 1 Rating <i>Checking unrestricted sprawl</i>	Purpose 2 Rating <i>Preventing merging towns</i>	Purpose 3 Rating <i>Safeguarding countryside from encroachment</i>	Purpose 4 Rating <i>Preserving setting and special character of historic towns</i>
B110	Walsall	3.7	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B111	Walsall	19.3	Strong	Weak / No contribution	Strong	Weak / No contribution
B112	Walsall	3.7	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B113	Walsall	5.3	Moderate	Weak / No contribution	Strong	Weak / No contribution
B114	Walsall	6.4	Moderate	Weak / No contribution	Strong	Weak / No contribution
B115	Walsall	3.3	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B116	Walsall	5.7	Weak / No contribution	Moderate	Moderate	Weak / No contribution
B117	Walsall	211.7	Strong	Strong	Strong	Weak / No contribution
B118	Walsall	9.0	Moderate	Moderate	Moderate	Weak / No contribution
B119	Walsall	9.0	Moderate	Moderate	Moderate	Weak / No contribution
B120	Walsall	313.4	Strong	Strong	Strong	Weak / No contribution
B121	Walsall	256.9	Moderate	Strong	Moderate	Weak / No contribution
B122	Walsall	22.5	Moderate	Moderate	Weak / No contribution	Weak / No contribution
B123	Walsall	3.1	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B124	Walsall	2.2	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B125	Walsall	18.4	Moderate	Strong	Moderate	Weak / No contribution
B126	Walsall	29.0	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B127	Walsall	2.0	Moderate	Moderate	Moderate	Weak / No contribution
B128	Walsall	52.6	Strong	Strong	Strong	Weak / No contribution
B129	Walsall	48.3	Strong	Moderate	Strong	Weak / No contribution
B130	Walsall	59.6	Strong	Moderate	Strong	Weak / No contribution
B131	Walsall	2.2	Moderate	Weak / No contribution	Moderate	Weak / No contribution
B132	Walsall	44.9	Strong	Moderate	Strong	Weak / No contribution
B133	Walsall	43.7	Strong	Strong	Strong	Weak / No contribution
B134	Walsall	3.4	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
B135	Walsall	6.1	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B136	Walsall	1.2	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B137	Walsall	161.2	Moderate	Strong	Moderate	Weak / No contribution
B138	Walsall	12.6	Weak / No contribution	Moderate	Moderate	Weak / No contribution
B139	Walsall	11.9	Moderate	Moderate	Moderate	Weak / No contribution
B140	Walsall	4.6	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
B141	Walsall	7.9	Moderate	Weak / No contribution	Moderate	Weak / No contribution

Assessment of Contribution to Green Belt Purpose 1

- 5.4 Purpose 1 of the NPPF Green Belt purposes seeks to check the unrestricted the sprawl of large built-up areas. The West Midlands conurbation, including most land within the City of Wolverhampton, Dudley, Sandwell and Walsall, is a large built-up area, and the combination of Cannock and Hednesford and the adjoining area of Great Wyrley (including Cheslyn Hay) is also defined as a large built-up area.

City of Wolverhampton

- 5.5 Land on the northern and western fringes of the urban area makes a *strong* contribution to preventing sprawl, but limited connectivity between the wider countryside and the often narrow strip of Green Belt between Tettenhall/Pendeford and the central urban area of Wolverhampton limits contribution in these areas to *moderate*.

Dudley Metropolitan Borough Council

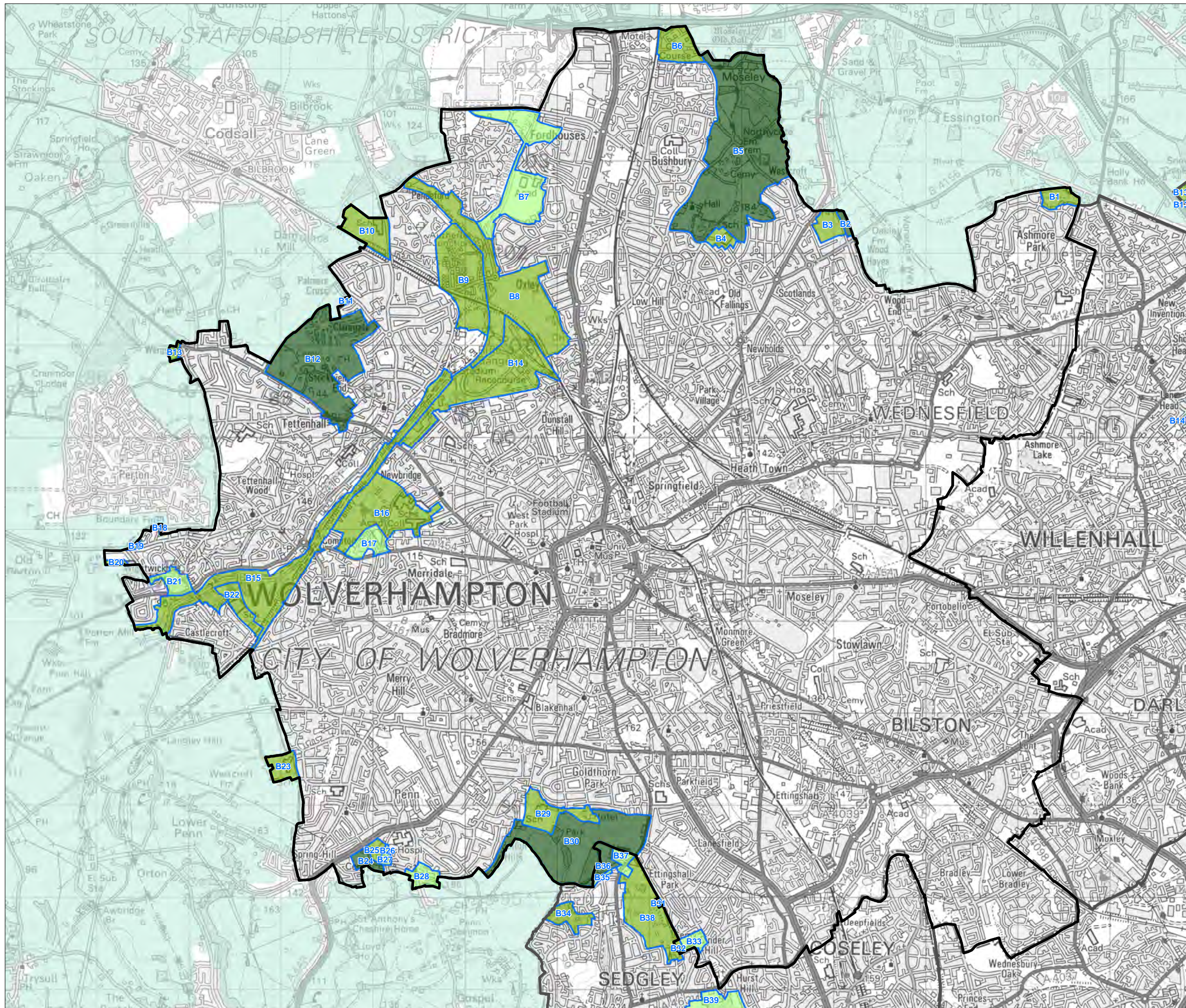
- 5.6 To the south of the conurbation, there is a relatively narrow strip of Green Belt that lies within the Metropolitan Borough of Dudley, so most land that is not largely contained by development is considered to make a strong contribution to Purpose 1.

Sandwell Metropolitan Borough Council

- 5.7 The Sandwell Valley is a sizeable area of Green Belt that makes a *strong* contribution to preventing sprawl between West Bromwich and Birmingham, but there are also some more contained and areas affected by urban-influences towards the northern edge of the Borough that make a weaker contribution.

Walsall Council

- 5.8 Most land to the west and north of Walsall bears a strong relationship with the urban area but also retains a relationship with the wider countryside, therefore making a *strong* contribution to preventing sprawl, although there are also some more contained and areas affected by urban-influences towards the northern edge of the Borough that make a weaker contribution.
- 5.9 The more contained area of Green Belt between Willenhall and Bloxwich makes a *moderate* contribution, other than in smaller areas where development has reduced openness.

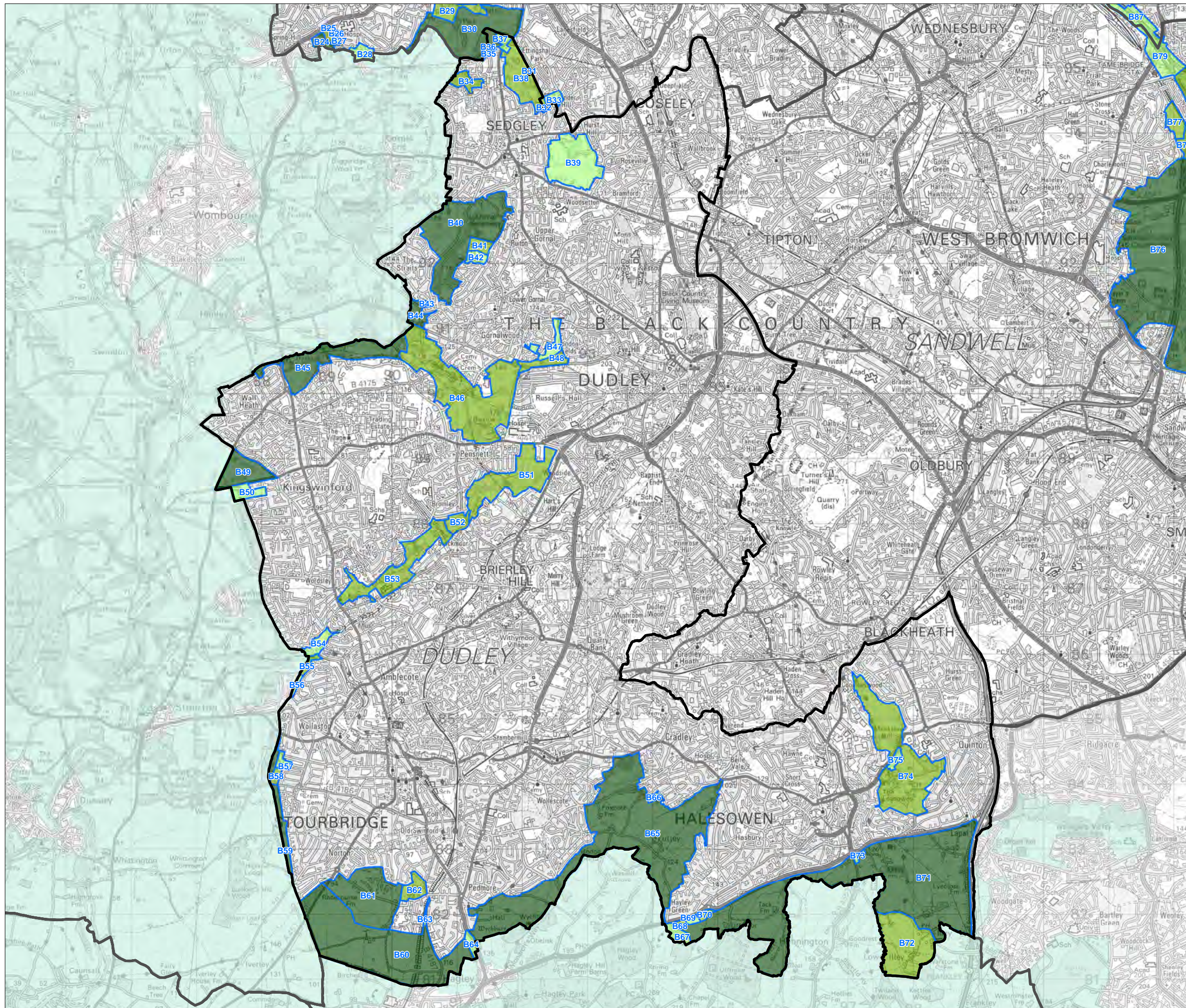


Black Country Green Belt Study

Figure 5.1a: Green Belt Purpose 1 - Checking the Unrestricted Sprawl of Large Built-Up Areas - City of Wolverhampton

- City of Wolverhampton Borough
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 1 rating**
- Strong
- Moderate
- Weak / No contribution





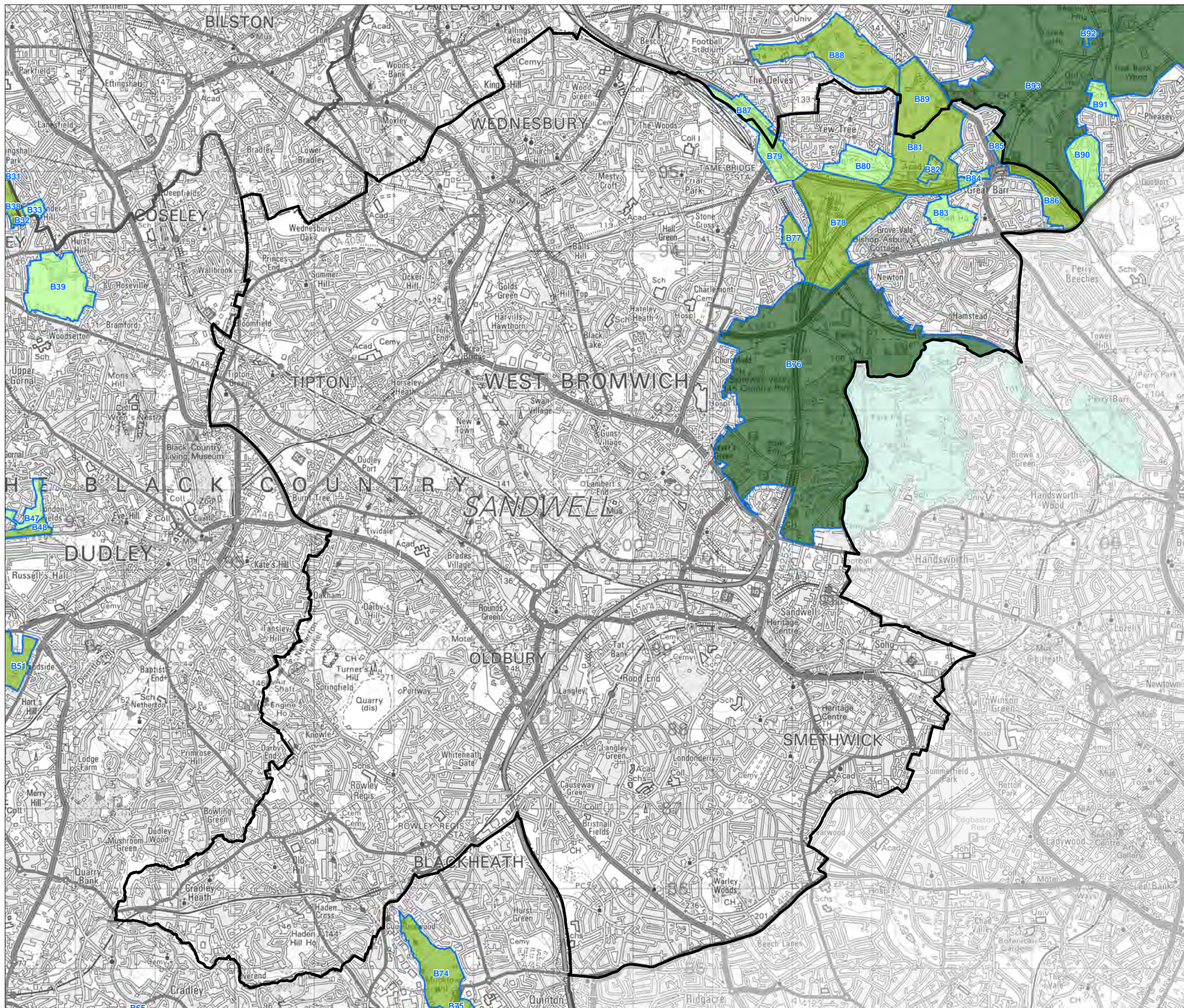
Black Country Green Belt Study

Figure 5.1b: Green Belt Purpose 1 -
Checking the Unrestricted Sprawl of
Large Built-Up Areas - Dudley

- Dudley Borough
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 1 rating**
- Strong
- Moderate
- Weak / No contribution








0 1.5 km







Black Country Green Belt Study

Figure 5.1c: Green Belt Purpose 1 - Checking the Unrestricted Sprawl of Large Built-Up Areas - Sandwell

-  Sandwell Borough
 -  Other Local Authority
 -  Green Belt outside project area
 -  Stage 1 parcel
- Purpose 1 rating
-  Strong
 -  Moderate
 -  Weak / No contribution

0 1.5 km  

Assessment of Contribution to Green Belt Purpose 2

- 5.10 Purpose 2 of the NPPF Green Belt purposes seeks to prevent neighbouring towns from merging into one another.

City of Wolverhampton

- 5.11 The narrow Green Belt separating Tettenhall from the rest of Wolverhampton makes no contribution to this purpose because Tettenhall is not in itself considered to constitute a separate town. The nearest towns to the west, Telford and Bridgnorth, are a sufficient distance away for intervening open land to be considered to form a robust gap.
- 5.12 Countryside on the northern edge of the conurbation around Bushbury Hill and Moseley makes a *moderate* contribution to separation between Wolverhampton and Great Wyrley, a gap which is weakened by the presence of intervening inset development at Brinsford, Featherstone, the Hilton Main Industrial Estate and Shareshill.
- 5.13 On the southern edge of the City, Green Belt land plays a *moderate* role in maintaining separation between Wolverhampton and Sedgley, other than where development has reduced openness, and/or containment by inset development has weakened the contribution.

Dudley Metropolitan Borough Council

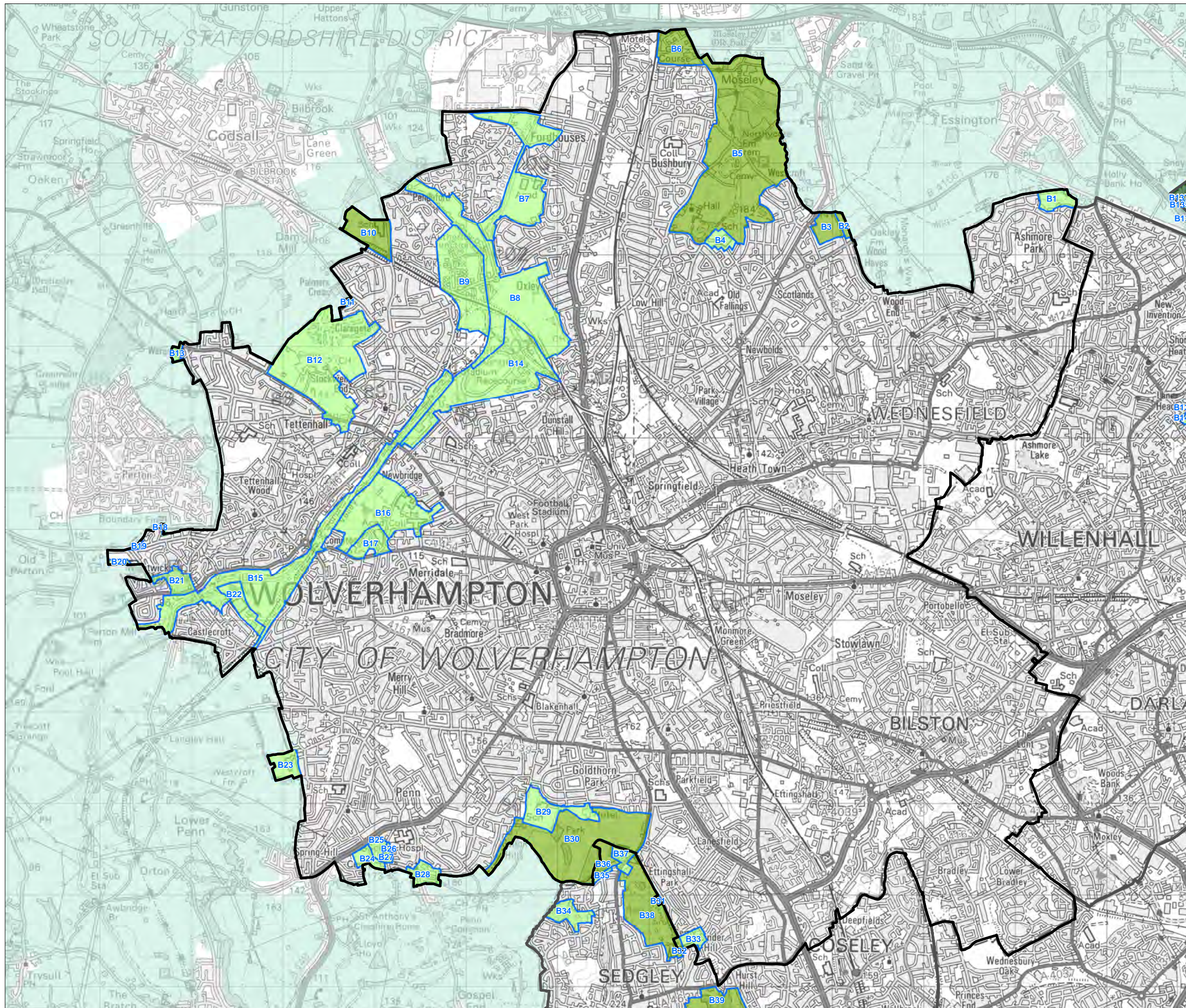
- 5.14 Within the Borough of Dudley, the narrow strips of Green Belt that penetrate into, or are isolated within, the urban area, typically make a *moderate* or *weak/no* contribution to the separation of the towns that form the conurbation: Dudley, Kingswinford, Brierley Hill, Sedgley, Stourbridge, Halesowen and Blackheath. The degree of connectivity between the urban settlements around these areas of Green Belt prevents them from making a stronger contribution. Smaller parts of these Green Belt strips that are either strongly contained by urban edges or which contain urbanising development make a weaker contribution.
- 5.15 The Green Belt within Dudley District to the south of the conurbation also for the most part makes a *moderate* contribution to this purpose. Between Halesowen and Birmingham the gap south of the A456 is small but contribution is limited by the extent of connectivity to the north, and similarly the area between Stourbridge and Halesowen makes a *moderate* contribution.
- 5.16 The size of the gap to Kidderminster and the presence of intervening inset villages (Cookley, Kinver, Dunsley, Stourton, Blakedown and West Hagley) means that land to the south of Stourbridge also makes a *moderate* contribution.

Sandwell Metropolitan Borough Council

- 5.17 The Sandwell Valley and surrounding area of Green Belt makes a *strong* contribution to separating West Bromwich from Birmingham, other than in several peripheral areas where development and/or the impact of adjacent development within the inset area reduce contribution.








Walsall Council

- 5.18 Much of the Green Belt in Walsall District makes a *strong* contribution to the separation of towns. Walsall, Aldridge, Brownhills, Bloxwich, Willenhall and Birmingham are identified as separate but closely neighbouring towns, and Green Belt between them is typically open enough, broad enough, and/or well enough linked to countryside beyond the conurbation, to make a *strong* contribution. Smaller inset areas such as Pelsall, Rushall, Shelfield and Streetly also serve to limit the separation between the settlement areas defined as towns.
- 5.19 Areas on the fringes of the urban area to the north of Pelsall and north-east of Aldridge, where separation from the nearest towns is greater, make a *moderate* contribution, and the size of the gap to the east of Brownhills means that land here makes no significant contribution.
- 5.20 Some more contained, peripheral parts of the Green Belt area centred on Sandwell Valley, that either lie within parts of the same town rather than between separate towns (e.g. around Walsall Golf Club) or which have lost openness through development, make a weaker contribution the Purpose 2.

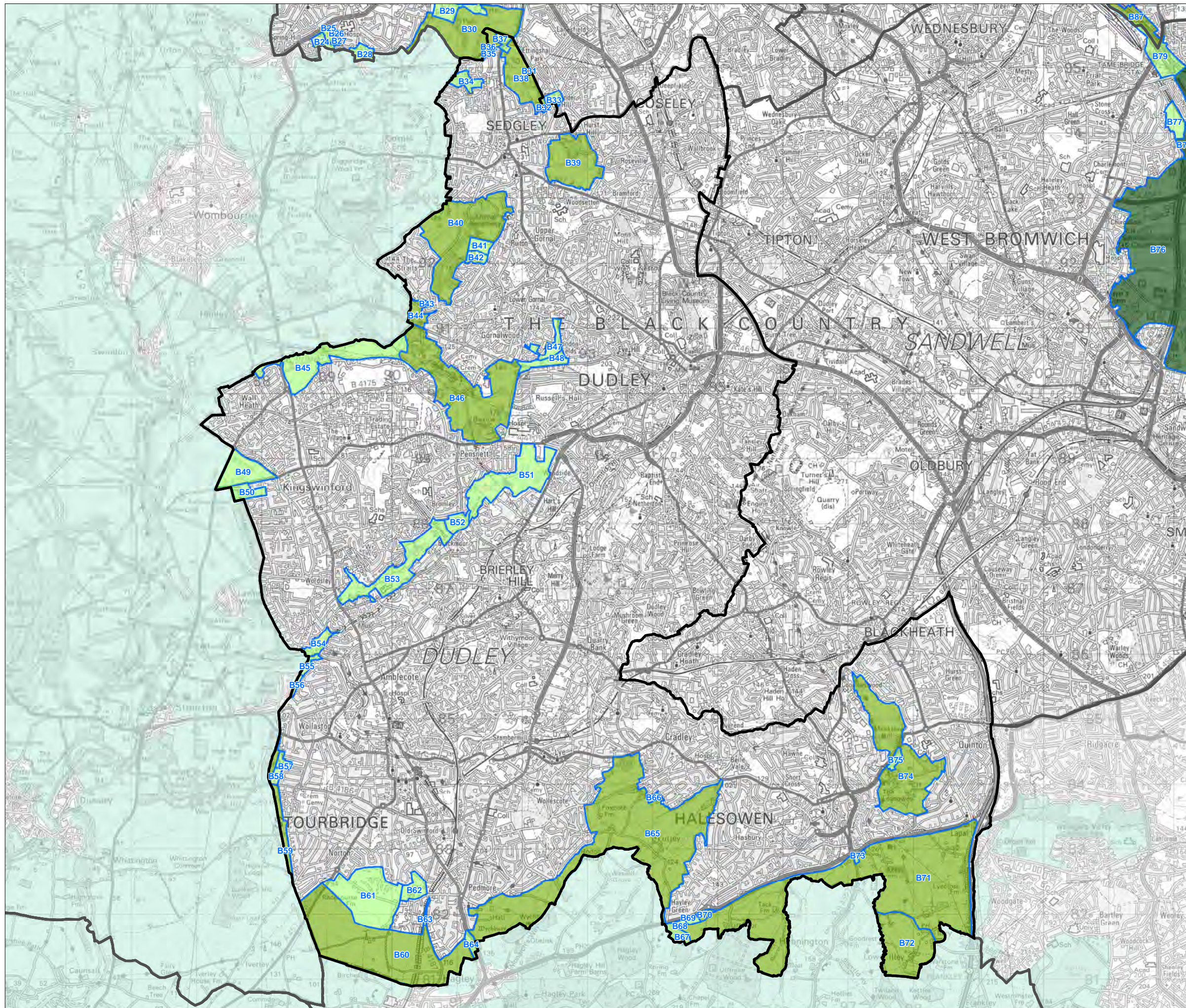


Black Country Green Belt Study

Figure 5.2a: Green Belt Purpose 2 - Preventing the Merging of Neighbouring Towns - City of Wolverhampton

-  City of Wolverhampton Borough
-  Other Local Authority
-  Green Belt outside project area
-  Stage 1 parcel
- Purpose 2 rating**
-  Strong
-  Moderate
-  Weak / No contribution

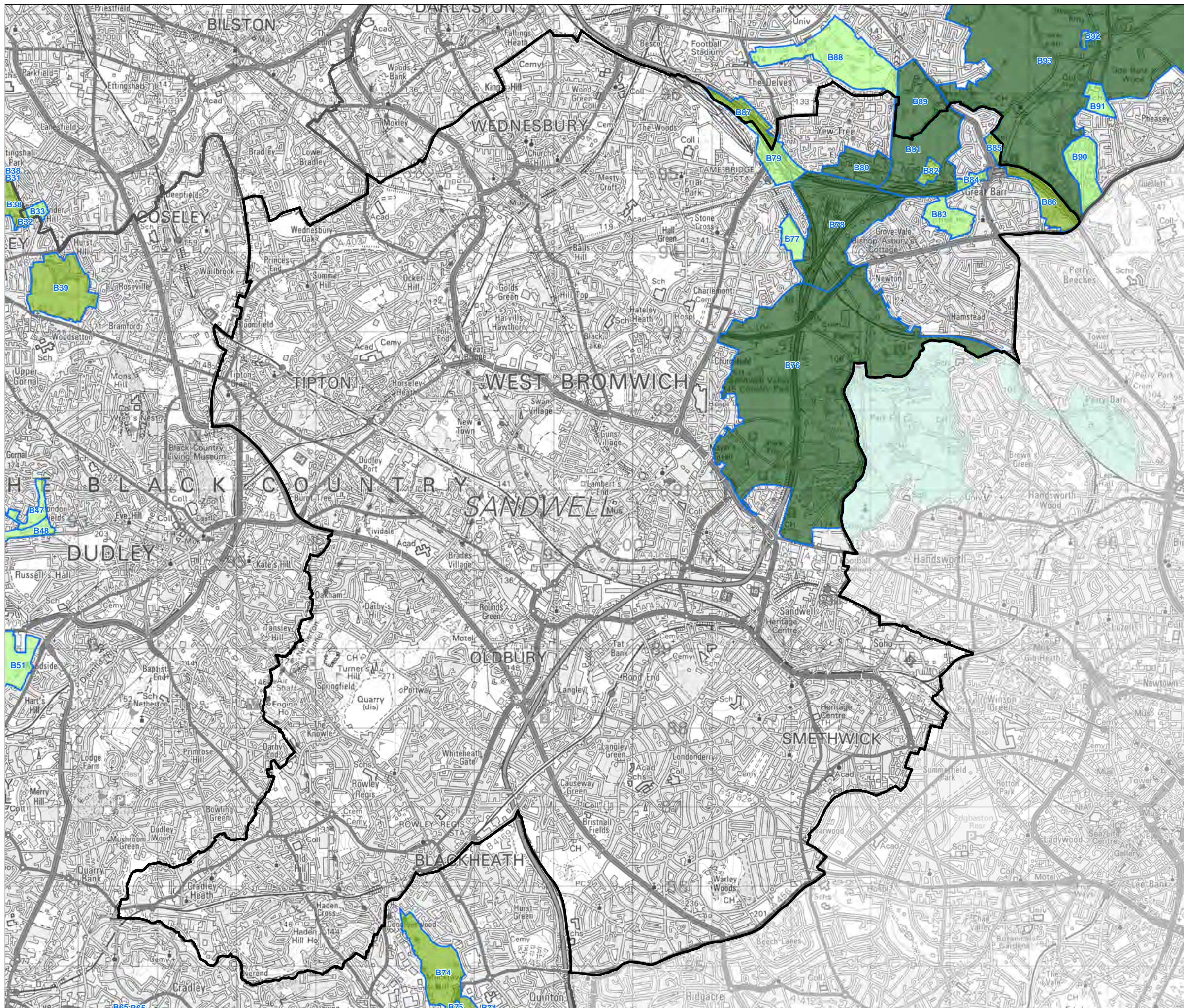




Black Country Green Belt Study

Figure 5.2b: Green Belt Purpose 2 - Preventing the Merging of Neighbouring Towns - Dudley

- Dudley Borough
 - Other Local Authority
 - Green Belt outside project area
 - Stage 1 parcel
- Purpose 2 rating
- Strong
 - Moderate
 - Weak / No contribution



Black Country Green Belt Study

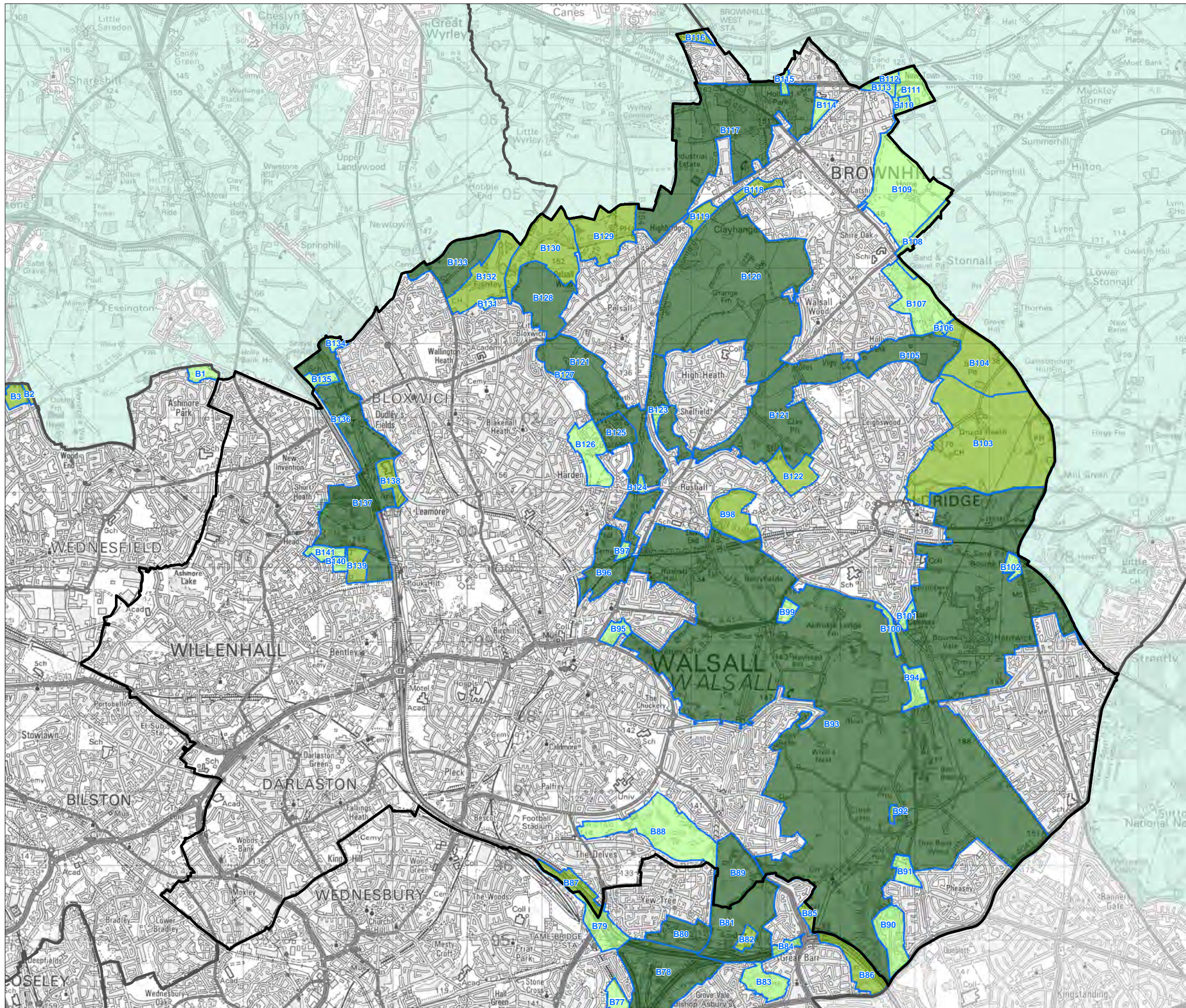
Figure 5.2c: Green Belt Purpose 2 - Preventing the Merging of Neighbouring Towns - Sandwell

- Sandwell Borough
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 2 rating**
- Strong
- Moderate
- Weak / No contribution

0 1.5 km

Black Country
Green Belt Study

Figure 5.2d: Green Belt Purpose 2 - Preventing the Merging of Neighbouring Towns - Walsall



- Walsall Borough
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 2 rating**
- Strong
- Moderate
- Weak / No contribution

0 1.5 km



Assessment of Contribution to Green Belt Purpose 3

- 5.21 Purpose 3 of the NPPF Green Belt purposes seeks to assist in safeguarding the countryside from encroachment.

City of Wolverhampton

- 5.22 The Green Belt following Smestow Brook and the Staffordshire and Worcestershire Canal is too contained to make a strong contribution to preventing encroachment, although the watercourses provide some link to the wider countryside, and some areas have development which reduces contribution to *moderate* and *weak*.
- 5.23 Elsewhere in the City, land on the urban fringes that lacks significant containment typically makes a *strong* contribution to this purpose.

Dudley Metropolitan Borough Council

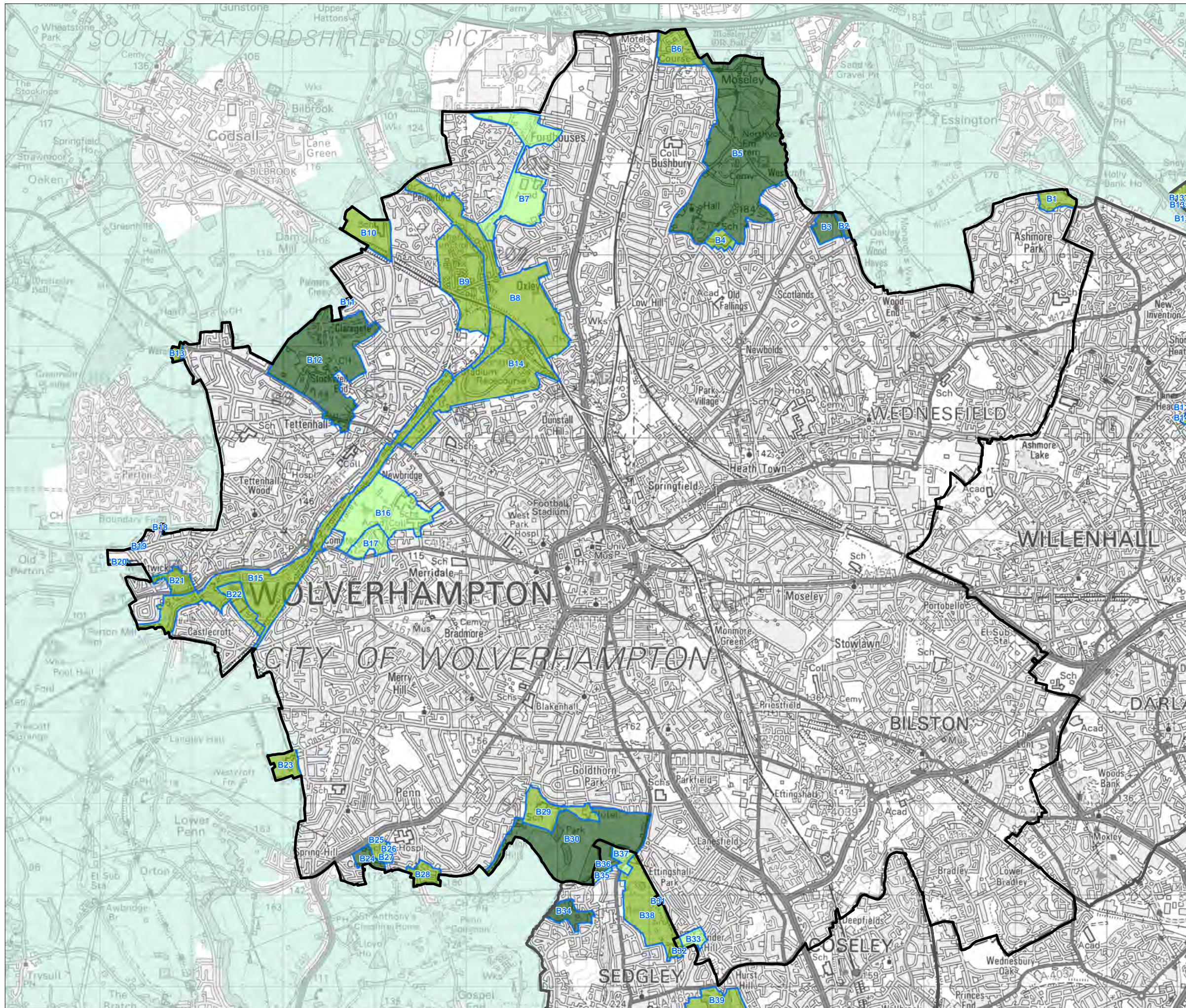
- 5.24 Dudley includes several isolated areas of land that, whilst lacking connectivity with the rest of the Green Belt, are large enough or prominent enough in terms of topography – e.g. Muckow Hill and along the Stourbridge Canal – to make a *moderate* contribution to Purpose 3. Land on the western and southern edges of the Borough that is not contained by urban form makes a *strong* contribution.

Sandwell Metropolitan Borough Council

- 5.25 The Sandwell Valley area, in combination with Green Belt land beyond the Borough boundary to the east, is a broad enough area to make a strong contribution to this purpose. Land to the north, contained between West Bromwich, Walsall and Birmingham and subdivided by motorways, has more urban influence and so makes a *moderate* contribution.

Walsall Council

- 5.26 In common with Green Belt Purpose 1, the prevention of sprawl, much of the Green Belt in Walsall District makes a *strong* contribution to preventing countryside encroachment. The proximity of urban areas and presence of development than reduces openness has diminished contribution in some locations – notably to the north of Walsall / east of Bloxwich and in the gap between Bloxwich and Willenhall/Wednesfield that is bisected by the M6 - but most of the Green Belt has sufficient openness and relationship with the wider countryside to make a *strong* contribution.

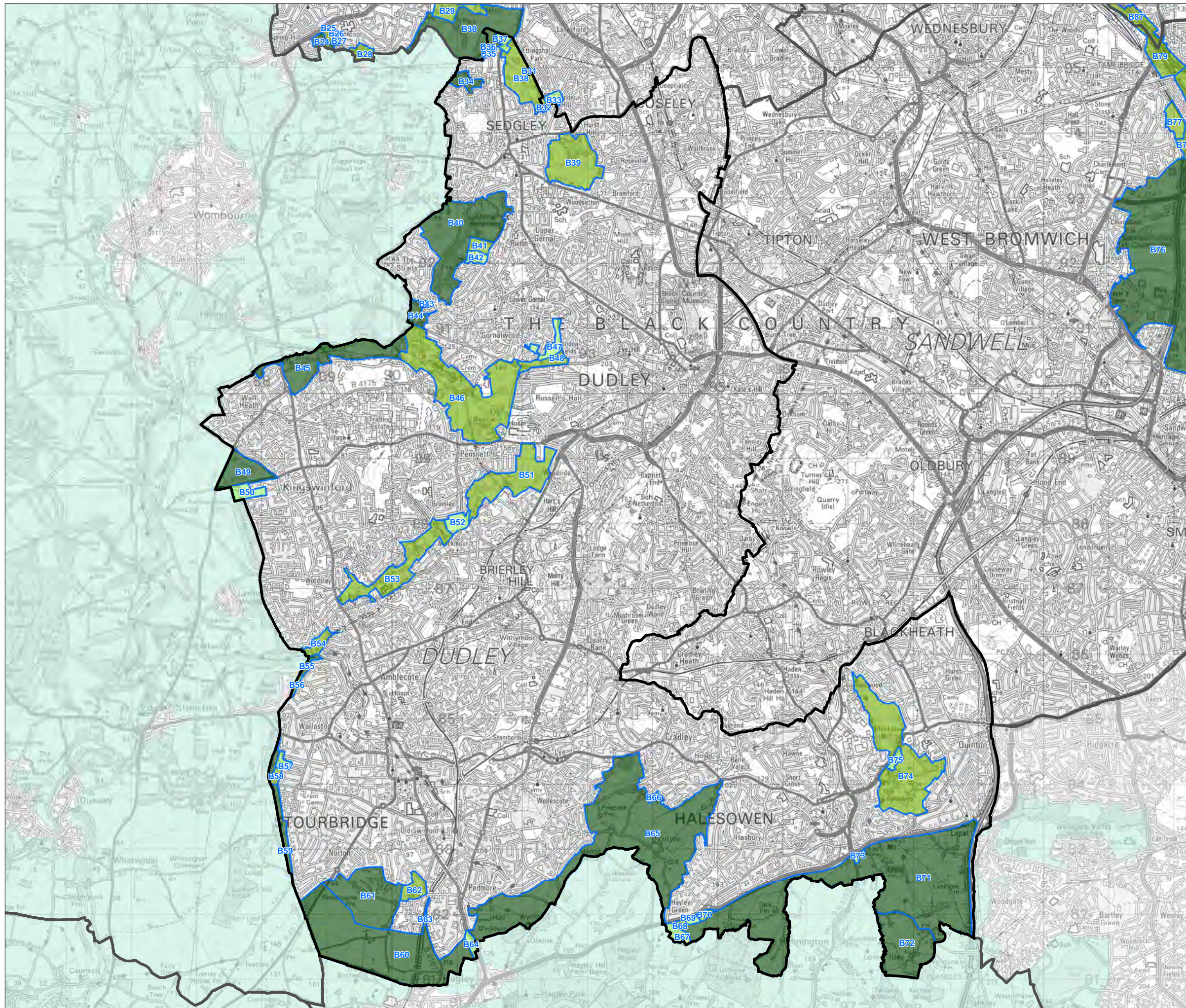


**Black Country
Green Belt Study**

Figure 5.3a: Green Belt Purpose 3 - Safeguarding the Countryside from Encroachment - City of Wolverhampton

- City of Wolverhampton Borough
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 3 rating**
- Strong
- Moderate
- Weak / No contribution





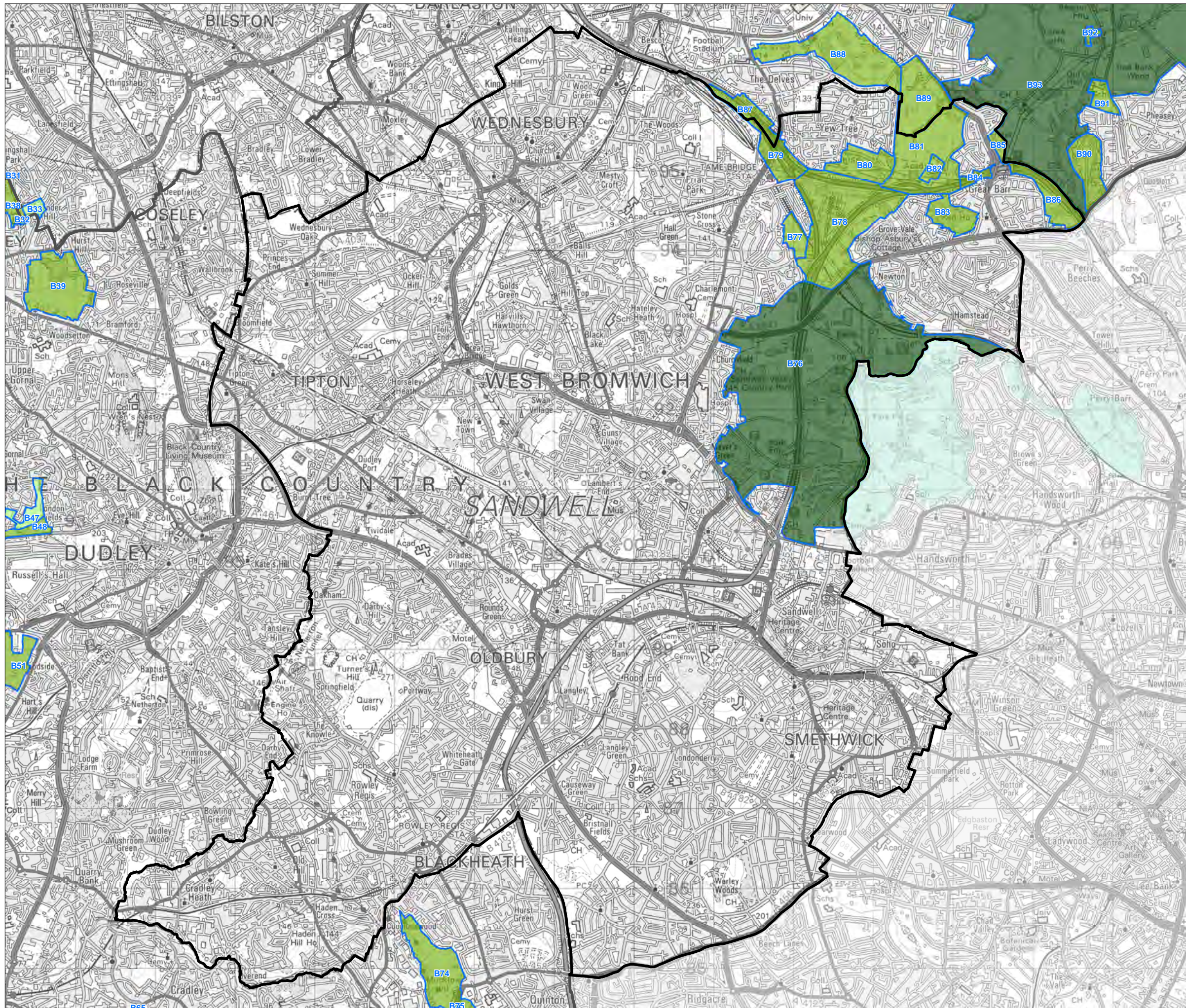
Black Country Green Belt Study

Figure 5.3b: Green Belt Purpose 3 - Safeguarding the Countryside from Encroachment - Dudley

- Dudley Borough
 - Other Local Authority
 - Green Belt outside project area
 - Stage 1 parcel
- Purpose 3 rating
- Strong
 - Moderate
 - Weak / No contribution

0 1.5 km



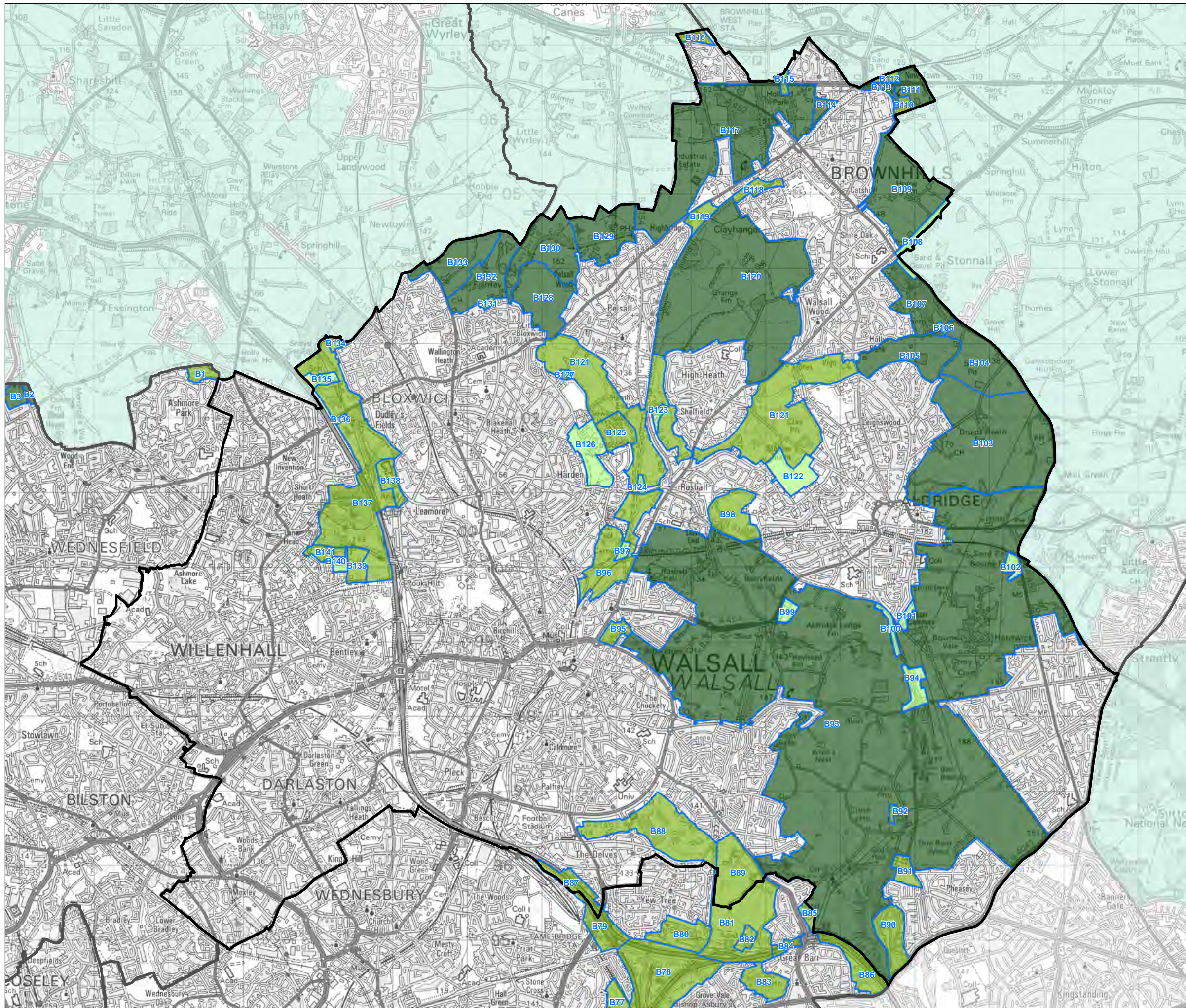


Black Country Green Belt Study

Figure 5.3c: Green Belt Purpose 3 - Safeguarding the Countryside from Encroachment - Sandwell

- Sandwell Borough
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 3 rating**
- Strong
- Moderate
- Weak / No contribution

0 1.5 km



Black Country Green Belt Study

Figure 5.3d: Green Belt Purpose 3 -
Safeguarding the Countryside from
Encroachment - Walsall

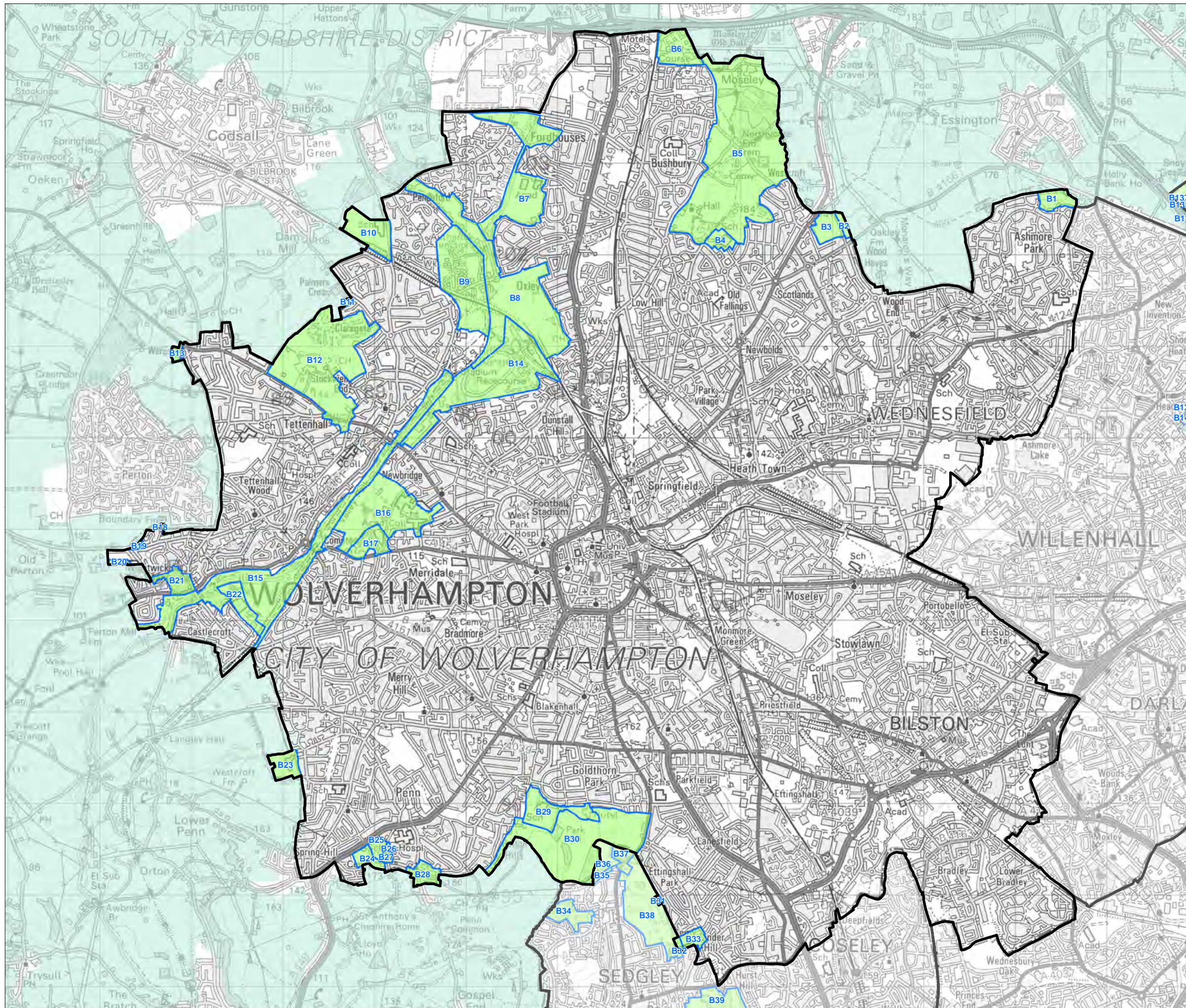
- Walsall Borough
 - Other Local Authority
 - Green Belt outside project area
 - Stage 1 parcel
- Purpose 3 rating
- Strong
 - Moderate
 - Weak / No contribution

0 1.5 km








Assessment of Contribution to Green Belt Purpose 4

- 5.27 Purpose 4 of the NPPF Green Belt purposes seeks to preserve the setting and special character of historic towns. Analysis as part of this study has determined that no Green Belt land in the Black Country contributes sufficiently to the setting or special character of any town within or around the study area, to make more than a *weak* contribution to this Green Belt purpose.



Black Country Green Belt Study

Figure 5.4a: Green Belt Purpose 4 - Preserve the Setting and Special Character of Historic Towns - City of Wolverhampton






-  City of Wolverhampton Borough
-  Other Local Authority
-  Green Belt outside project area
-  Stage 1 parcel
- Purpose 4 rating**
-  Weak / No contribution

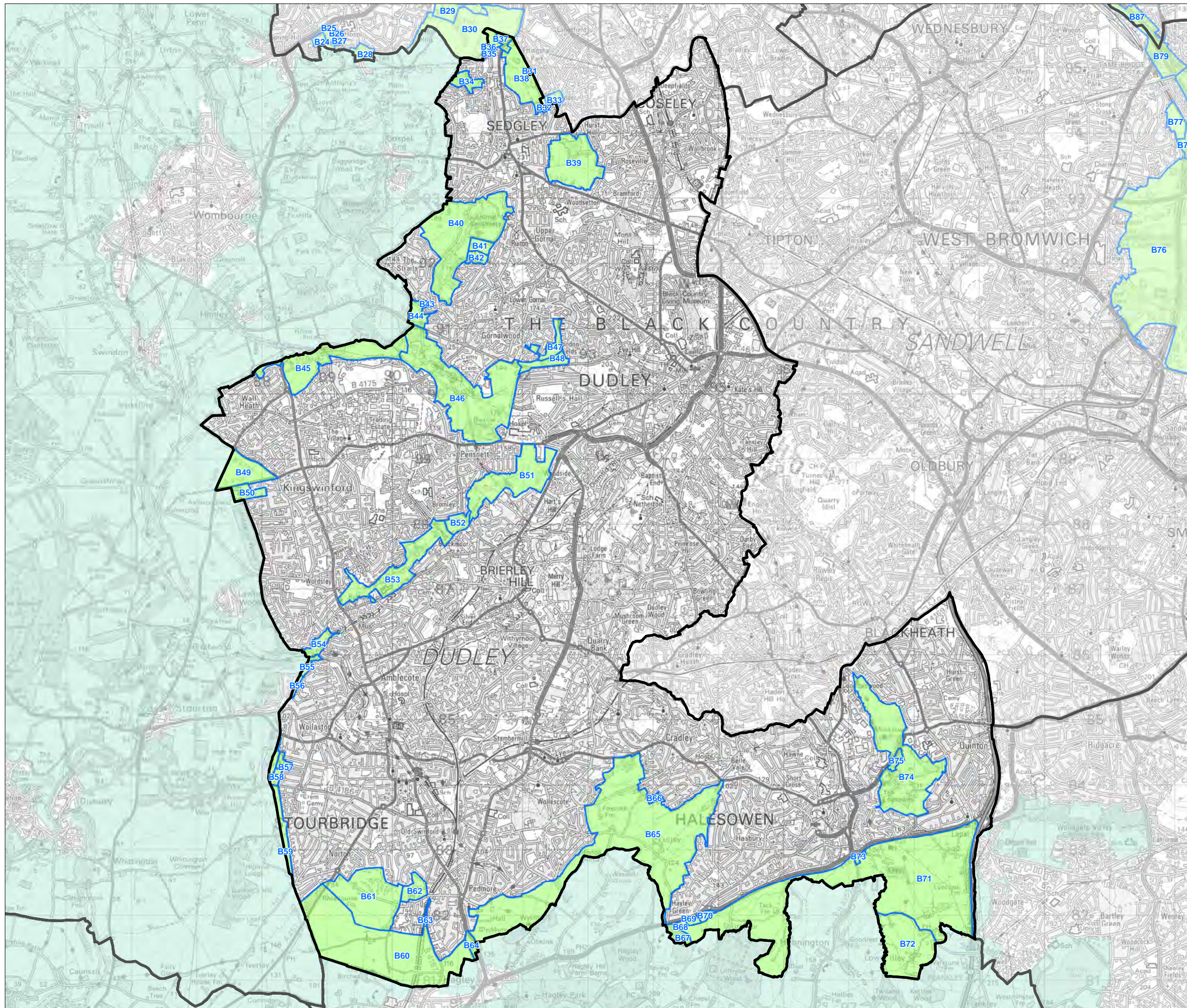
0 1 km



Black Country Green Belt Study

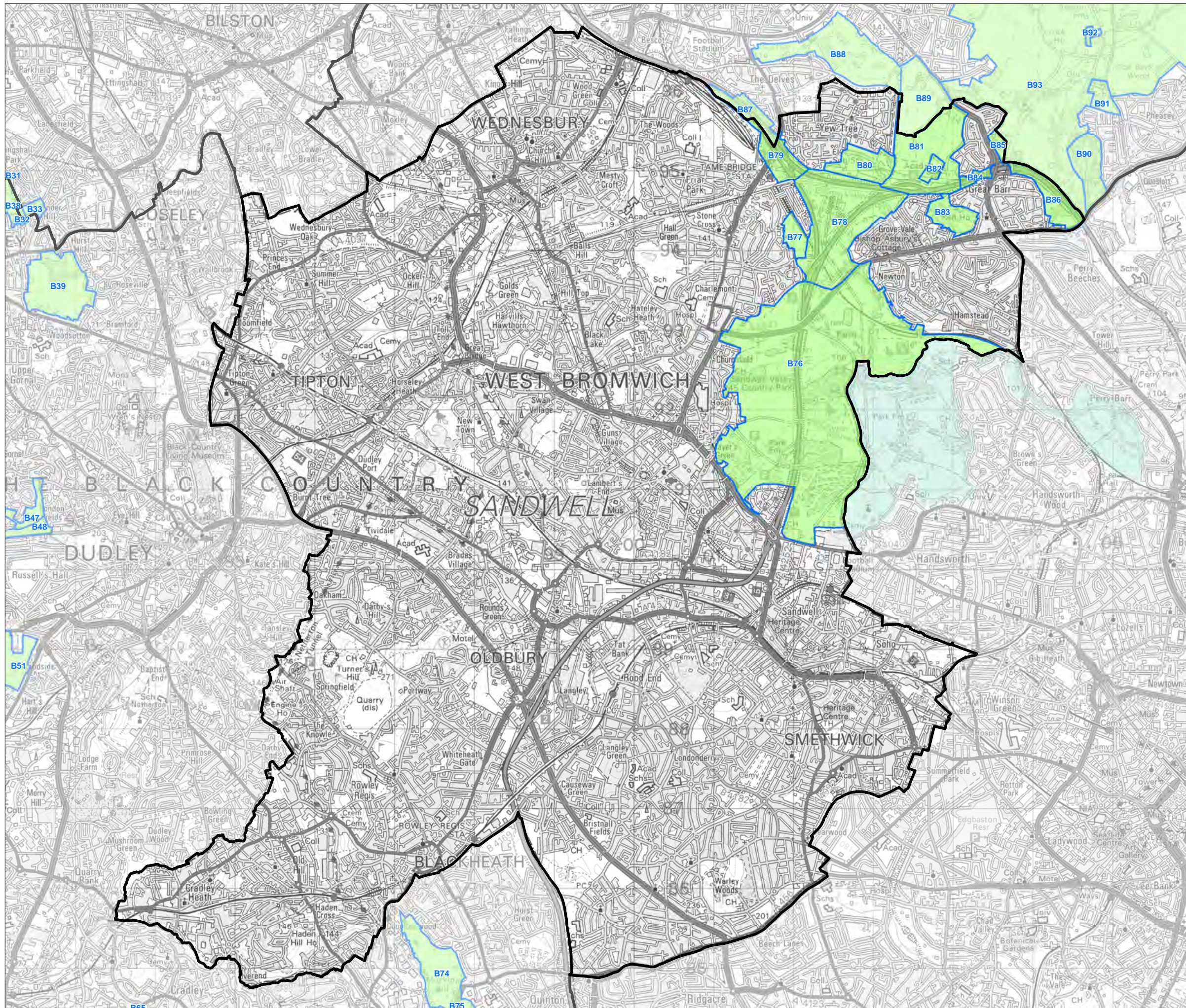
Figure 5.4b: Green Belt Purpose 4 -
Preserve the Setting and Special
Character of Historic Towns -
Dudley

-  Dudley Borough
-  Other Local Authority
-  Green Belt outside project area
-  Stage 1 parcel
- Purpose 4 rating**
-  Weak / No contribution








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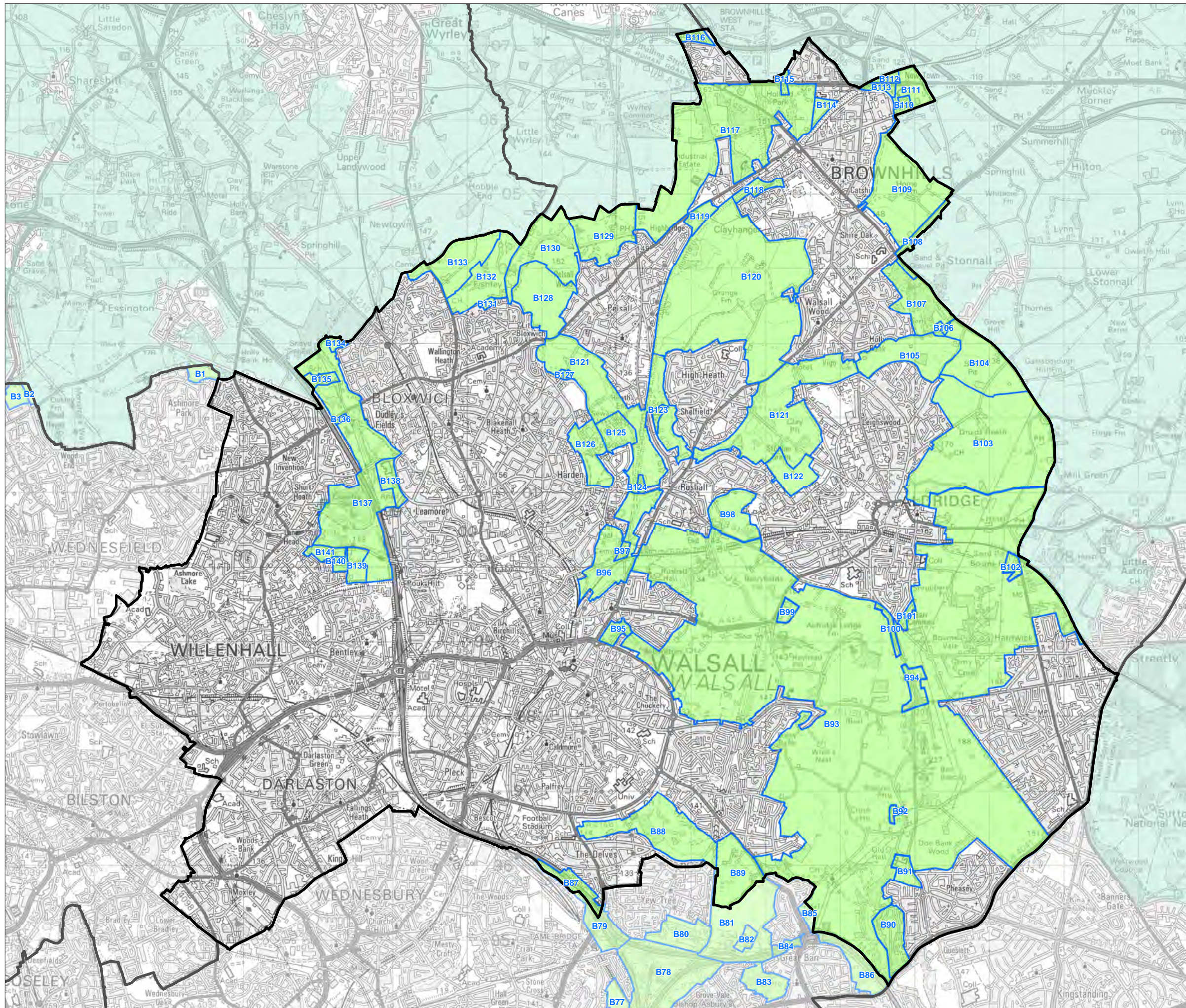


Black Country Green Belt Study

Figure 5.4c: Green Belt Purpose 4 - Preserve the Setting and Special Character of Historic Towns - Sandwell

-  Sandwell Borough
-  Other Local Authority
-  Green Belt outside project area
-  Stage 1 parcel
- Purpose 4 rating**
-  Weak / No contribution

0 1.5 km  



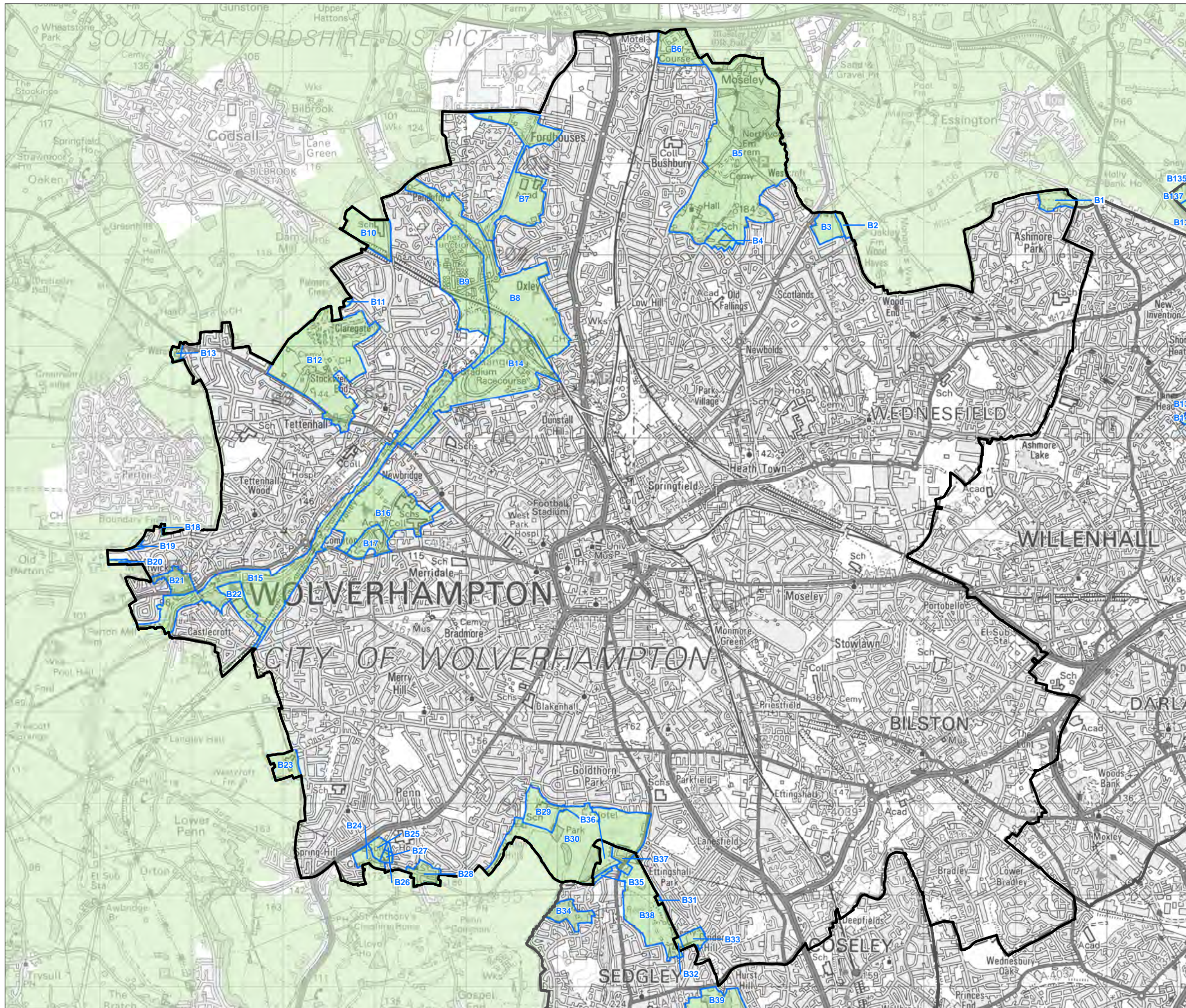
**Black Country
Green Belt Study**

Figure 5.4d: Green Belt Purpose 4 - Preserve the Setting and Special Character of Historic Towns - Walsall

- Walsall Borough
- Other Local Authority
- Green Belt outside project area
- Stage 1 parcel
- Purpose 4 rating
- Weak / No contribution





0 1.5 km





**Black Country
Green Belt Study**

Figure 5.5a: Stage 1 Parcels - City of Wolverhampton





-  City of Wolverhampton Borough
-  Other Local Authority
-  Green Belt
-  Stage 1 parcel

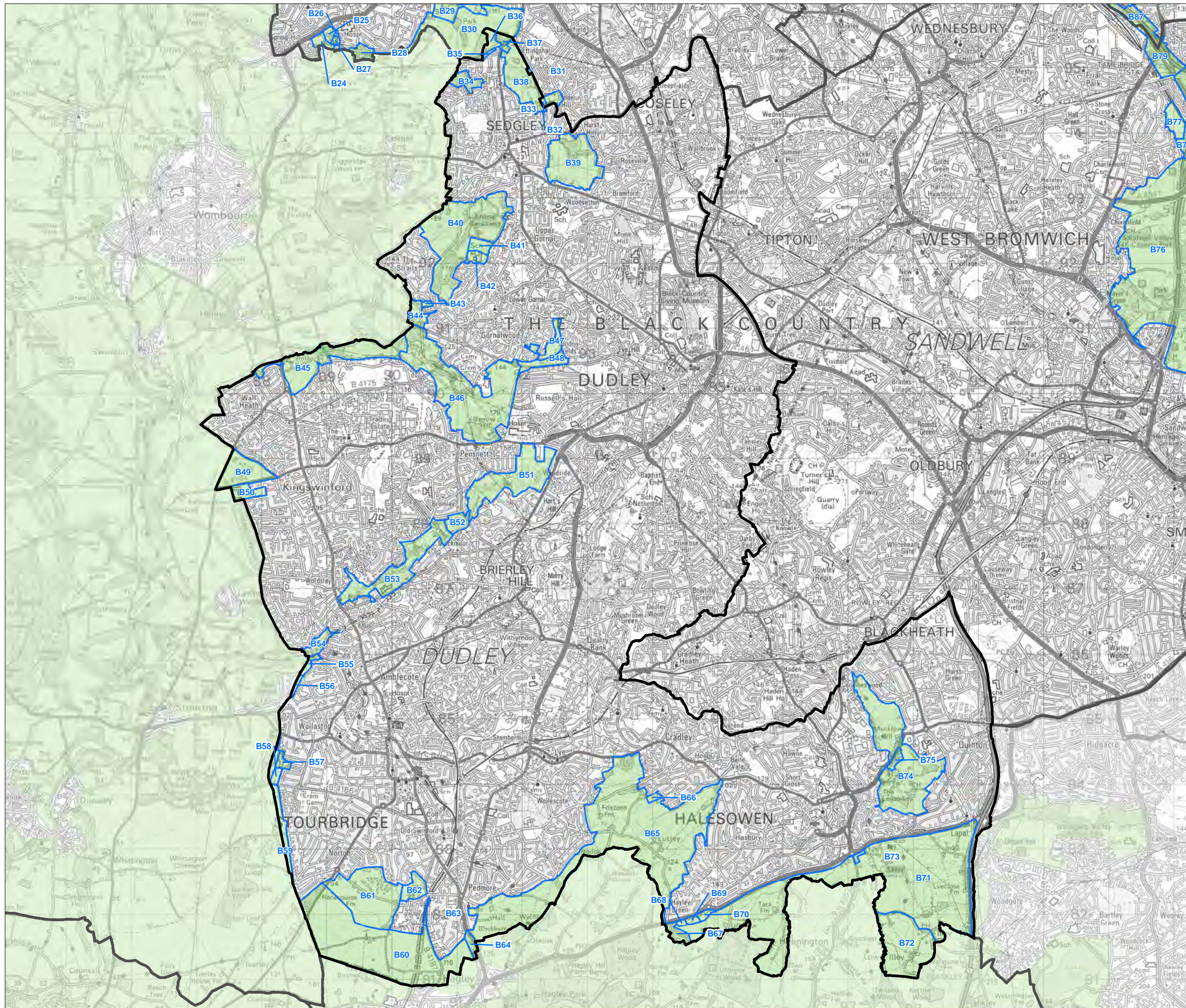
0 1 km

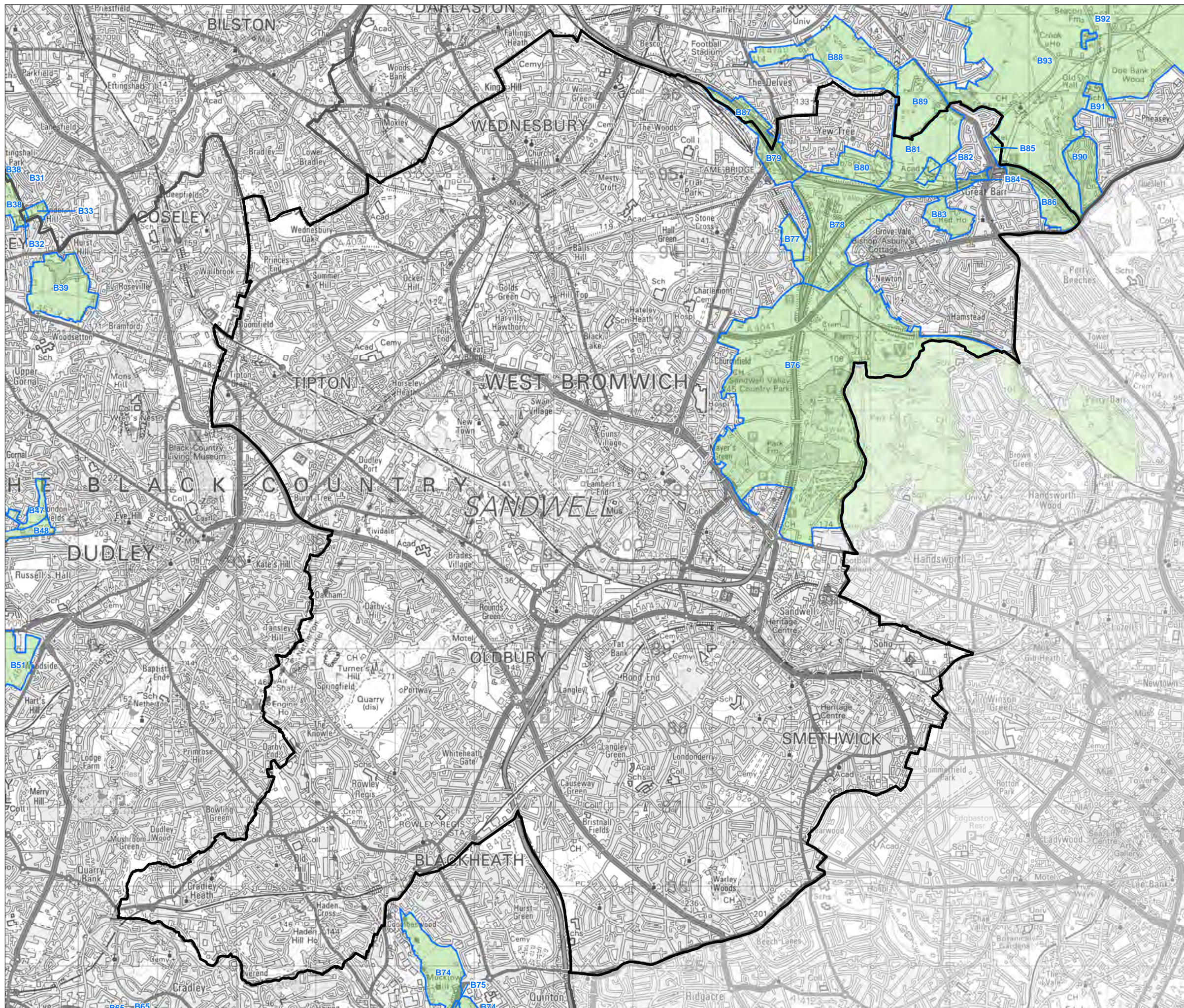


Black Country Green Belt Study

Figure 5.5b: Stage 1 Parcels - Dudley





-  Dudley Borough
-  Other Local Authority
-  Green Belt
-  Stage 1 parcel





Black Country Green Belt Study

Figure 5.5c: Stage 1 Parcels - Sandwell

-  Sandwell Borough
-  Other Local Authority
-  Green Belt
-  Stage 1 parcel

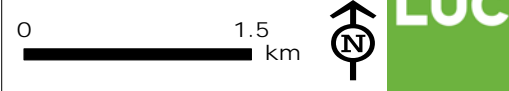
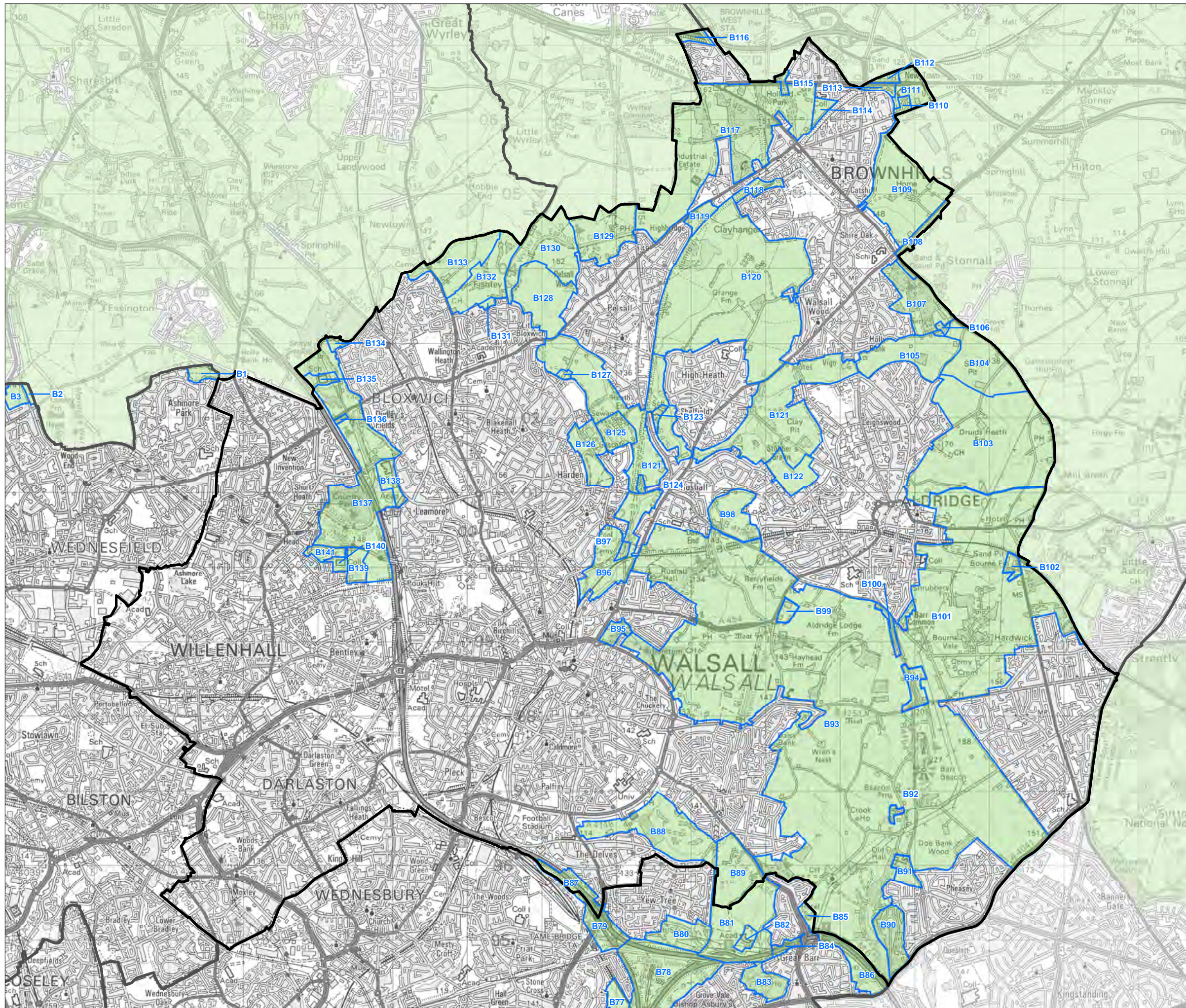
0 1.5 km



Black Country Green Belt Study

Figure 5.5d: Stage 1 Parcels -
Walsall

- Walsall Borough
- Other Local Authority
- Green Belt
- Stage 1 parcel



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 Councils, the assessment area for Stage 2 incorporated all land within the four Black Country districts (excluding land which is constrained by absolute constraints as defined in para 6.5 below). This ensured that all promoted sites identified by the Councils through their 'call for sites' exercise were included in the assessment.
- 6.3 The promoted sites referenced 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' exercises. 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 for assessment at Stage 2. It was assumed that any land released from the Green Belt would need to be contiguous with an inset settlement or urban edge.
- 6.5 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 development⁵⁶, these were identified as:
- Cultural Heritage:
 - Scheduled Monuments (SMs).
 - Registered Parks and Gardens (RPGs).
 - Natural Heritage:
 - Special Areas of Conservation (SACs).
 - Sites of Special Scientific Interest (SSSIs).
 - National Nature Reserves (NNRs).
 - Local Nature Reserves (LNRs).
 - Sites of Importance for Nature Conservation (SINC)⁵⁷/ Sites of Biological Importance (SBI).
 - Ancient Woodland⁵⁸.

⁵⁶ 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.

⁵⁷ Potential SINC additions and removals are mapped and discussed within assessments, however this land is not excluded from the Stage 2 harm assessment as it is not currently / may not in the future be covered by an absolute constraint.

⁵⁸ The Ancient Woodland data used in this study is Natural England data. However, it is noted that Dudley and Walsall Councils also have additional information on ancient woodland within these districts, including that reflected in Walsall's Site Allocation Document (adopted January 2019) and Dudley's Borough Development Strategy (2017).

- Other Constraints:
 - Common Land.
 - Flood Zone 3 Areas.
 - Burial Grounds.

- 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 base⁵⁹ 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 the Black Country, even if there are 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.

⁵⁹ This wider evidence base will consider a range of matters that would be relevant to the suitability, practicality and implications of developing sites. The topics to be considered will include matters such as the natural and built environment, open space, infrastructure, access to facilities, traffic and transport and the viability and deliverability of development.

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

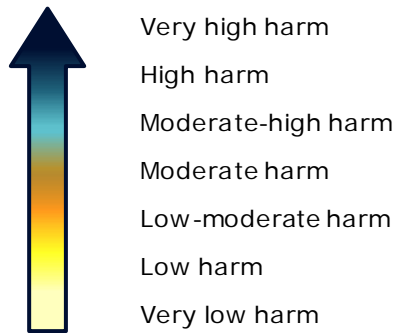
- 6.16 The assessment of contribution at Stage 1 already considers the relationship between a parcel and adjacent Green Belt land, but at the sub-parcel level it is possible to address how the loss of a specific area of land will affect Green Belt boundaries and the strength/ integrity of the adjacent 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 and 4, 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.

- **Purpose 4:** Would the role of remaining Green Belt in forming a distinctive setting to a historic town be diminished by loss of openness in the parcel/site under assessment?

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.

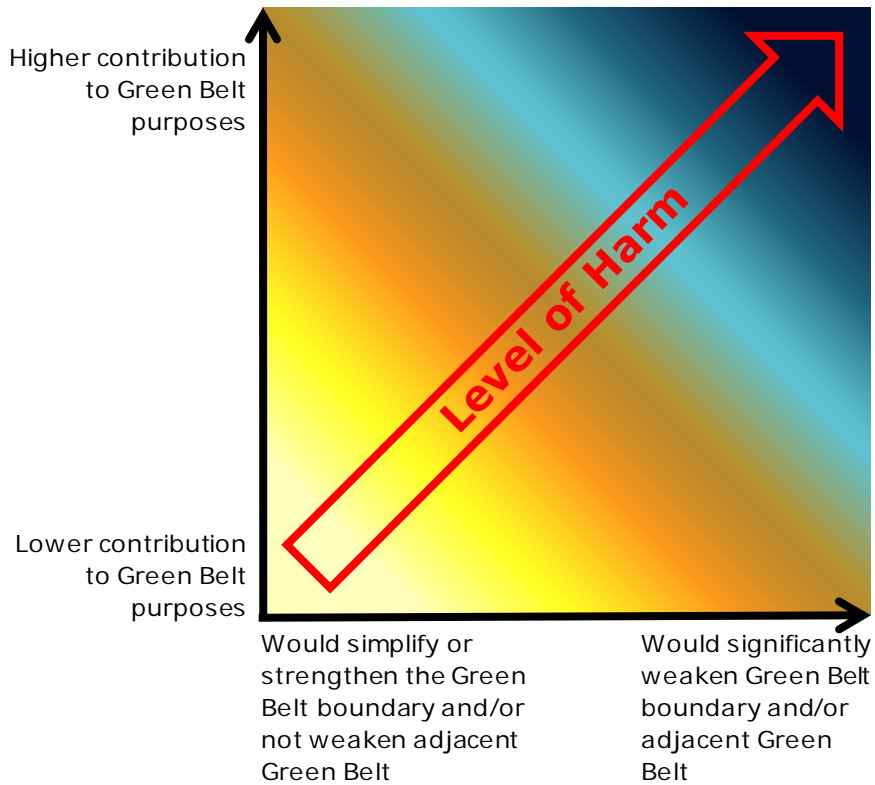


6.23 **Figure 6.1** provides an indication as to how the contribution to the Green Belt and the impact on adjacent Green Belt and the strength of the boundary influence the overall harm of Green Belt release. However, **professional judgement** is required in each individual case to consider how much 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 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/sites⁶⁰.
 - An aerial view of the mapped area.
 - A photograph of the assessment area⁶¹.
 - 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.

⁶⁰ Promoted sites within the Black Country are labelled in light blue and promoted sites within South Staffordshire are labelled in dark

blue.  Promoted site (BC)  Promoted site (SS)

⁶¹ These photographs are illustrative and cannot be taken as representative of sub-parcels as a whole.

7 Stage 2 Findings

Introduction

- 7.1 This chapter sets out the findings of the assessment of Green Belt harm (as outlined in **Chapter 6**).
- 7.2 As outlined in **Chapter 6**, the assessment of harm included the following steps:
- Step 1: Consideration of contribution ratings in more depth.
 - Step 2: Assessment potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessment overall Green Belt harm.
 - Step 4: Consideration of harm resulting from alternative Green Belt release 'scenarios'.
- 7.3 Where there were variations in the three factors influencing Green Belt harm across sub-parcel, different harm scenarios were identified to reflect any variations in harm. This took into account the fact that harm may vary if development is constrained to a smaller more contained area within the sub-parcel as a whole, or harm may differ if sub-parcels are released as extensions of existing inset settlements, or as new inset areas.
- 7.4 The findings for the assessment of harm are, together with the Stage 1 contribution to Green Belt purposes, are presented in **Appendix 3** on a sub-parcel by sub-parcel basis. Ratings and commentary are provided for each release scenario considered.

Summary of findings

- 7.5 The detailed findings of the assessment of harm are included in **Appendix 3** and are summarised by sub-parcel in **Table 7.1** and by site in **Table 7.2** below. **Figure 7.1 (a-d)** show the sub-parcels within each authority area, and **Figure 7.2 (a-d)** the absolute constraints to development. **Figure 7.3 a-d** show the potential degree of harm that would result if the sub-parcel scenarios were released. **Table 7.3** and summarises the amount of land identified (in hectares and percentages) for each level of harm (i.e. very low to very high).
- 7.6 Where sub-parcels are assessed as having lower harm to the Green Belt if they were to be removed, this does not necessarily mean that those areas should be released. Any release of Green Belt land requires consideration of the 'exceptional circumstances' justifying its release. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that can justify release of the land from the Green Belt. Other factors, such as the sustainability and the ability to meet development needs outside of the Green Belt also need to be taken into consideration. This is explained further below.

Table 7.1: Green Belt assessment of harm ratings: by sub-parcel

Sub-parcel Scenario	Authority	Area excluding constraints (ha)	Harm Rating
B1As1	City of Wolverhampton	7.3	Low
B2As1	City of Wolverhampton	2.2	Moderate
B3As1	City of Wolverhampton	8.3	Low - Moderate
B4As1	City of Wolverhampton	5.1	Low - Moderate
B5As1	City of Wolverhampton	109.1	Very High
B5As2	City of Wolverhampton	7.4	Moderate - High
B6As1	City of Wolverhampton	14.6	Low
B7As1	City of Wolverhampton	44.0	Very Low
B8As1	City of Wolverhampton	70.7	Low
B9As1	City of Wolverhampton	42.9	Low
B10As1	City of Wolverhampton	17.1	Moderate - High
B11As1	City of Wolverhampton	0.6	Moderate - High
B12As1	City of Wolverhampton	71.1	Moderate - High
B13As1	City of Wolverhampton	1.9	Moderate
B14As1	City of Wolverhampton	62.0	Low
B15As1	City of Wolverhampton	24.0	Low - Moderate
B16As1	City of Wolverhampton	24.4	Low
B16As2	City of Wolverhampton	10.6	Very Low
B17As1	City of Wolverhampton	9.8	Very Low
B18As1	City of Wolverhampton	0.3	Low
B19As1	City of Wolverhampton	0.6	Moderate
B20As1	City of Wolverhampton	1.2	Moderate
B21As1	City of Wolverhampton	0.9	Low
B22As1	City of Wolverhampton	9.2	Low
B23As1	City of Wolverhampton	8.0	Low - Moderate
B24As1	City of Wolverhampton	2.3	Moderate
B25As1	City of Wolverhampton	2.7	Low - Moderate
B27As1	City of Wolverhampton	1.2	Low
B28As1	City of Wolverhampton	6.9	Low
B29As1	City of Wolverhampton	16.4	Low - Moderate
B30As1	City of Wolverhampton	60.8	Very High
B31As1	City of Wolverhampton	0.5	Moderate
B35As1	Dudley	1.0	Very Low
B36As1	Dudley	5.8	High
B37As1	Dudley	4.4	Very Low
B38As1	Dudley	31.2	Moderate
B39As1	Dudley	49.4	Low
B40As1	Dudley	50.2	High
B40As2	Dudley	2.5	Moderate - High
B41As1	Dudley	6.0	Low - Moderate
B42As1	Dudley	4.7	Low
B43As1	Dudley	1.4	Low - Moderate
B44As1	Dudley	1.7	Moderate - High
B45As1	Dudley	27.5	Moderate
B45As2	Dudley	2.5	Moderate - High
B46As1	Dudley	50.1	Moderate
B46As2	Dudley	10.3	Low - Moderate
B46As3	Dudley	0.8	Low
B47As1	Dudley	10.5	Very Low
B48As1	Dudley	9.9	Low
B49As1	Dudley	28.1	Moderate - High

Sub-parcel Scenario	Authority	Area excluding constraints (ha)	Harm Rating
B50As1	Dudley	9.4	Very Low
B51As1	Dudley	2.7	Low
B52As1	Dudley	7.7	Low
B53As1	Dudley	8.9	Low
B54As1	Dudley	7.8	Low
B55As1	Dudley	2.6	Moderate
B56As1	Dudley	2.0	Low
B57As1	Dudley	3.9	Very Low
B58As1	Dudley	3.1	Low
B59As1	Dudley	14.8	Moderate - High
B60As1	Dudley	160.8	Very High
B60As2	Dudley	11.0	High
B60As3	Dudley	1.6	High
B60As4	Dudley	2.7	Moderate - High
B61As1	Dudley	50.3	Moderate - High
B62As1	Dudley	10.7	Moderate
B62As2	Dudley	0.6	Low - Moderate
B63As1	Dudley	0.7	Low - Moderate
B64As1	Dudley	4.2	Very Low
B65As1	Dudley	64.1	Very High
B65As2	Dudley	6.2	High
B65As3	Dudley	1.5	Low - Moderate
B65Bs1	Dudley	85.9	Very High
B65Bs2	Dudley	14.5	High
B65Cs1	Dudley	85.5	Very High
B65Cs2	Dudley	12.4	High
B66As1	Dudley	2.2	Low
B67As1	Dudley	7.2	Low - Moderate
B68As1	Dudley	1.4	Low - Moderate
B69As1	Dudley	2.3	Low - Moderate
B70As1	Dudley	2.7	Low - Moderate
B71As1	Dudley	91.3	Very High
B71As2	Dudley	8.3	High
B71Bs1	Dudley	211.0	Very High
B72As1	Dudley	56.9	Very High
B73As1	Dudley	1.5	Low - Moderate
B74As1	Dudley	43.4	Moderate
B74As2	Dudley	3.7	Low - Moderate
B75As1	Dudley	3.7	Low
B76As1	Sandwell	36.7	Very High
B76Bs1	Sandwell	46.6	Very High
B76Cs1	Sandwell	131.3	Very High
B76Ds1	Sandwell	58.9	High
B76Es1	Sandwell	0.7	Moderate
B77As1	Sandwell	7.9	Low
B78As1	Sandwell	68.6	High
B79As1	Sandwell	11.2	Low - Moderate
B80As1	Sandwell	22.9	Moderate
B81As1	Sandwell	49.8	High
B81As2	Sandwell	3.6	Moderate - High
B82As1	Sandwell	5.8	Moderate - High
B83As1	Sandwell	19.5	Very Low
B84As1	Sandwell	4.9	Low

Sub-parcel Scenario	Authority	Area excluding constraints (ha)	Harm Rating
B85As1	Sandwell	5.0	Low - Moderate
B86As1	Sandwell	14.7	Low
B87As1	Walsall	8.6	Low - Moderate
B88As1	Walsall	53.5	Low - Moderate
B88As2	Walsall	8.0	Low
B89As1	Walsall	40.5	High
B90As1	Walsall	23.8	Low
B91As1	Walsall	10.4	Low - Moderate
B92As1	Walsall	2.6	Very High
B93As1	Walsall	330.9	Very High
B93As2	Walsall	18.6	High
B93As3	Walsall	9.0	Moderate - High
B93As4	Walsall	2.6	Moderate - High
B93As5	Walsall	5.9	Moderate
B93Bs1	Walsall	229.0	Very High
B93Cs1	Walsall	222.7	Very High
B93Cs2	Walsall	43.6	High
B93Cs3	Walsall	30.5	Moderate - High
B93Ds1	Walsall	96.7	Very High
B93Es1	Walsall	120.2	Very High
B93Fs1	Walsall	173.4	Very High
B93Fs2	Walsall	1.4	Moderate - High
B93Gs1	Walsall	185.4	Very High
B93Gs2	Walsall	64.5	High
B94As1	Walsall	12.8	Moderate
B96As1	Walsall	30.5	Moderate - High
B97As1	Walsall	1.2	Very Low
B98As1	Walsall	28.4	Moderate - High
B99As1	Walsall	5.9	Very High
B100As1	Walsall	5.3	Low - Moderate
B101As1	Walsall	3.5	Low
B102As1	Walsall	5.6	High
B103As1	Walsall	220.6	High
B104As1	Walsall	62.3	Very High
B105As1	Walsall	41.9	Very High
B105As2	Walsall	2.7	High
B106As1	Walsall	1.9	Moderate - High
B107As1	Walsall	6.5	Very High
B107As2	Walsall	6.0	Moderate - High
B108As1	Walsall	10.6	Low - Moderate
B109As1	Walsall	90.4	High
B110As1	Walsall	3.7	Moderate
B111As1	Walsall	18.1	High
B111As2	Walsall	1.2	Moderate - High
B112As1	Walsall	3.7	Moderate
B113As1	Walsall	5.3	Moderate - High
B114As1	Walsall	5.6	Low - Moderate
B115As1	Walsall	2.8	Low - Moderate
B116As1	Walsall	4.6	Low
B117As1	Walsall	67.8	High
B117As2	Walsall	24.9	Moderate - High
B118As1	Walsall	8.9	Low
B120As1	Walsall	235.6	Very High

Sub-parcel Scenario	Authority	Area excluding constraints (ha)	Harm Rating
B120As2	Walsall	23.3	High
B120As3	Walsall	1.7	Moderate - High
B121As1	Walsall	25.4	Moderate - High
B121Bs1	Walsall	89.2	High
B121Cs1	Walsall	76.0	High
B121Ds1	Walsall	26.8	High
B122As1	Walsall	19.4	Low - Moderate
B123As1	Walsall	3.1	Very Low
B124As1	Walsall	2.2	Very Low
B125As1	Walsall	18.4	High
B126As1	Walsall	29.0	Very Low
B127As1	Walsall	2.0	Moderate
B128As1	Walsall	45.4	Very High
B130As1	Walsall	26.8	Very High
B130As2	Walsall	4.8	High
B130As3	Walsall	12.5	High
B131As1	Walsall	2.1	Low
B132As1	Walsall	44.4	High
B133As1	Walsall	39.9	Very High
B134As1	Walsall	3.4	Low
B135As1	Walsall	6.0	Low - Moderate
B136As1	Walsall	1.1	Low - Moderate
B137As1	Walsall	11.7	Moderate
B137Bs1	Walsall	7.6	Moderate - High
B137Cs1	Walsall	21.0	Moderate - High
B138As1	Walsall	2.3	Moderate
B138As2	Walsall	8.0	Low - Moderate
B139As1	Walsall	11.9	Low - Moderate
B140As1	Walsall	4.6	Very Low

Assessment of harm by Promoted Site

7.7 The findings of the assessment of harm were overlaid with the identified boundaries of the promoted sites. This includes a small number of sites submitted to the South Staffordshire call for sites that partly fall within the Black Country. The results are set out in **Table 7.2**. This summarises the degree of harm that would result from the release of the identified sites. In some cases the degree of harm varies within a site and in these circumstances, the variations are identified and rated separately **Table 7.4** summarises the amount of land within promoted sites identified (in hectares and percentages) for each level of harm (i.e. very low to very high).

Table 7.2: Green Belt assessment of harm ratings: by site

Promoted Site	Authority	Total Area of Site (ha)	Sub-parcel Scenario	Area of site within sub-parcel scenario excluding absolute constraints (ha) ^{62 63}	Harm Rating
Ref: C 14 (Housing)	City of Wolverhampton	1.06	B24As1	1.1	Moderate
Ref: C 17 (Housing)	City of Wolverhampton	1.15	B15As1	1.1	Low - Moderate
Ref: 23 (Wildside activity centre improvement)	City of Wolverhampton	0.19	B14As1	0.1	Low
Ref: 26 (Housing)	Dudley	24.14	B44As1	0.9	Moderate - High
			B46As1	2.8	Moderate
			B46As2	0.4	Low - Moderate
Ref: 39 (Employment and housing)	Dudley	1.24	B71Bs1	1.2	Very High
Ref: 40 (Housing)	Sandwell	2.51	B76Es1	0.6	Moderate
Ref: 44 (Housing)	Sandwell	3.14	B81As2	2.4	Moderate - High
Ref: 45 (Housing)	Dudley	1.06	B60As1	1.1	Very High
Ref: 46 (Housing)	Walsall	5.11	B93Cs3	5.1	Moderate - High
Ref: 47 (Housing)	City of Wolverhampton	2.38	B3As1	2.4	Low - Moderate
Ref: 49 (Employment and housing)	Walsall	5.94	B111As1	2.9	High
			B113As1	3.0	Moderate - High
Ref: 50 (Housing)	Dudley	2.91	B60As4	2.3	Moderate - High
			B63As1	0.6	Low - Moderate
Ref: 54 (Housing)	Dudley	1.23	B74As1	1.2	Moderate
Ref: 56 (Housing)	Dudley	0.7	B71Bs1	0.7	Very High
Ref: 57 (Housing)	Dudley	5.93	B39As1	5.9	Low
Ref: 58 (Housing)	City of Wolverhampton	2.98	B16As2	3.0	Very Low
Ref: 59 (Housing)	City of Wolverhampton	4.02	B16As1	3.9	Low
			B16As2	0.1	Very Low
Ref: 60 (Housing)	Walsall	4.22	B120As1	3.9	Very High
Ref: 61 (Housing)	City of Wolverhampton	0.47	B16As2	0.5	Very Low
Ref: 64 (Housing)	City of Wolverhampton	0.85	B12As1	0.8	Moderate - High
Ref: 67 (Employment and housing)	Dudley	14.74	B71Bs1	14.7	Very High
Ref: 70 (Housing)	Walsall	6.94	B126As1	6.9	Very Low
Ref: 74 (Housing)	City of Wolverhampton	2.8	B25As1	2.6	Low - Moderate
Ref: 76 (Housing)	City of Wolverhampton	2.85	B15As1	1.4	Low - Moderate
Ref: 102 (Housing)	Walsall	11.93	B93Gs1	0.7	Very High
			B93Gs2	11.2	High
Ref: 103 (Housing)	Dudley	4.23	B60As1	4.0	Very High
			B64As1	0.2	Very Low
Ref: 106 (Housing)	Walsall	86.07	B133As1	39.4	Very High

⁶² All promoted site areas and calculations are indicative, dependent on Council data accuracy.

⁶³ Note: Some promoted site overlap one another.

Promoted Site	Authority	Total Area of Site (ha)	Sub-parcel Scenario	Area of site within sub-parcel scenario excluding absolute constraints (ha) ^{62 63}	Harm Rating
Ref: 107 (Housing)	Walsall	23.93	B93Cs2	15.2	High
			B93Cs3	8.7	Moderate - High
Ref: 111 (Housing)	Dudley	14.71	B45As1	14.4	Moderate
Ref: 112 (Housing)	Walsall	1.36	B93Fs2	1.4	Moderate - High
Ref: 113 (Housing)	Dudley	0.37	B39As1	0.1	Low
Ref: 114 (Housing)	Dudley	223.94	B60As1	135.4	Very High
			B60As2	10.5	High
			B61As1	48.1	Moderate - High
			B62As1	10.6	Moderate
Ref: 115 (Employment and housing)	Sandwell	27.12	B81As1	27.0	High
Ref: 116 (Housing)	Walsall	87.07	B93Bs1	86.9	Very High
Ref: 118 (Housing)	Walsall	39.9	B93Fs1	39.6	Very High
Ref: 125 (Housing)	Walsall	37.32	B93Fs1	36.3	Very High
Ref: 129 (Housing)	Walsall	15.78	B93As1	0.3	Very High
			B93As2	15.5	High
Ref: 131 (Housing)	Walsall	84.73	B109As1	83.3	High
Ref: 147 (Housing)	Dudley	2.09	B40As2	1.6	Moderate - High
Ref: 148 (Housing)	Walsall	17.47	B105As1	11.5	Very High
Ref: 150 (Housing)	Dudley	38.83	B74As1	36.0	Moderate
Ref: 152 (Housing)	Walsall	21.47	B117As1	17.6	High
Ref: 156 (Housing)	Walsall	14.63	B121Bs1	0.4	High
			B125As1	14.2	High
Ref: 159 (Housing)	Walsall	3.12	B120As1	3.1	Very High
Ref: 162 (Housing)	Walsall	13.86	B103As1	13.8	High
Ref: 163 (Housing)	Walsall	2.44	B93As2	2.4	High
Ref: 164 (Housing)	Walsall	4.41	B93As3	4.4	Moderate - High
Ref: 169 (Housing)	Dudley	0.091738	B53As1	<0.1	Low
Ref: 171 (Housing)	Dudley	25.11	B49As1	25.0	Moderate - High
Ref: 172 (Housing)	Walsall	25.59	B93Cs1	2.4	Very High
			B93Cs2	23.1	High
Ref: 173 (Housing)	Walsall	7.54	B93Ds1	7.5	Very High
Ref: 175 (Housing)	Dudley	4.27	B39As1	3.8	Low
Ref: 176 (Housing)	Walsall	5.47	B93Gs2	5.3	High
Ref: 180 (Housing)	City of Wolverhampton	113	B30As1	52.8	Very High
Ref: 182 (Housing)	Walsall	0.91	B103As1	0.9	High
Ref: 185 (Housing)	Walsall	7.21	B93Bs1	7.2	Very High
Ref: 192 (Housing)	City of Wolverhampton	2.84	B18As1	0.3	Low
Ref: 197 (Employment and housing)	City of Wolverhampton	100.08	B5As1	28.8	Very High
			B5As2	7.2	Moderate - High
Ref: 203 (Housing)	Dudley	19.78	B65As1	19.7	Very High
Ref: 209 (Housing)	Dudley	1.78	B45As1	1.8	Moderate
Ref: 210 (Housing or mixed use)	Walsall	2.66	B105As2	2.7	High
Ref: 212 (Housing)	Walsall	44.51	B100As1	0.3	Low - Moderate
			B93Es1	43.9	Very High
Ref: 213 (Housing)	Walsall	40.12	B120As1	19.0	Very High
			B120As2	19.7	High
Ref: 214 (Gypsy and traveller site)	Walsall	0.28	B96As1	0.2	Moderate - High
Ref: 215 (Housing)	Walsall	2.78	B93Gs2	2.8	High
Ref: 216 (Housing)	Dudley	13.81	B65Bs1	11.7	Very High
Ref: 217 (Housing)	Dudley	1.36	B74As1	1.4	Moderate
Ref: 218 (Housing)	Dudley	3.81	B65Cs1	3.8	Very High
Ref: 219 (Housing)	Dudley	3.79	B65Cs1	3.0	Very High
Ref: 221 (Housing)	Walsall	1.88	B118As1	1.9	Low
Ref: 222 (Housing)	Walsall	0.66	B93Cs1	0.7	Very High
Ref: 225 (Housing)	Dudley	1.27	B65Bs2	1.0	High
Ref: 239 (Employment and housing)	Walsall	18.1	B103As1	18.1	High
Ref: 245 (Housing)	Dudley	3.77	B55As1	1.9	Moderate

Promoted Site	Authority	Total Area of Site (ha)	Sub-parcel Scenario	Area of site within sub-parcel scenario excluding absolute constraints (ha) ^{62 63}	Harm Rating
			B56As1	1.7	Low
Ref: 246 (Employment and housing)	Dudley	10.68	B46As1	10.6	Moderate
Ref: 247 (Housing)	Dudley	1.06	B46As1	1.0	Moderate
Ref: 263 (Housing)	Sandwell	0.05	B77As1	0.1	Low
Ref: 264 (Housing)	Dudley	4.59	B59As1	4.3	Moderate - High
Ref: 266 (Housing)	Walsall	8.02	B120As2	8.0	High
Ref: 269 (Employment)	Walsall	11.31	B137As1	11.0	Moderate
			B139As1	0.3	Low - Moderate
Ref: 270 (Housing)	City of Wolverhampton	0.06	B8As1	0.1	Low
Ref: 271 (Housing)	Dudley	0.89	B65Bs1	0.9	Very High
Ref: 277 (Housing)	Walsall	2.65	B105As2	2.6	High
Ref: 278 (Housing)	City of Wolverhampton	3.2	B3As1	3.2	Low - Moderate
Ref: 279 (Employment and housing)	Walsall	40.12	B120As1	19.0	Very High
			B120As2	19.7	High
Ref: 280 (Housing)	Dudley	21.52	B59As1	3.9	Moderate - High
Ref: 281 (Housing)	Walsall	64.44	B93Es1	52.1	Very High
Ref: 282 (Housing)	City of Wolverhampton	7.3	B5As2	7.3	Moderate - High
Ref: 283 (Housing)	City of Wolverhampton	5.25	B29As1	5.2	Low - Moderate
Ref: 284 (Housing)	City of Wolverhampton	0.83	B5As1	0.8	Very High
Ref: 285 (Housing)	Walsall	1.01	B105As1	0.9	Very High
Ref: 286 (Housing)	Walsall	0.99	B103As1	0.9	High
Ref: 288 (Housing)	Walsall	1.43	B90As1	1.4	Low
Ref: 289 (Travelling show people site)	Walsall	0.23	B121Bs1	0.1	High
			B127As1	0.1	Moderate
Ref: 290 (Housing)	Walsall	37.32	B93Fs1	36.3	Very High
Ref: 291 (Housing)	Walsall	17.84	B120As1	4.4	Very High
Ref: 292 (Housing)	City of Wolverhampton	0.1	B19As1	0.1	Moderate
Ref: 295 (Housing)	Dudley	64.19	B65Bs1	55.0	Very High
			B65Bs2	7.3	High
Ref: 297 (Housing)	Walsall	2.55	B116As1	2.5	Low
Ref: 298 (Housing)	City of Wolverhampton	0.13	B8As1	0.1	Low
Ref: 299 (Housing)	City of Wolverhampton	0.14	B8As1	0.1	Low
Ref: 300 (Housing)	City of Wolverhampton	0.75	B8As1	0.2	Low
Ref: 301 (Golf Club House)	City of Wolverhampton	1.75	B8As1	1.7	Low
Ref: 486a (Housing) ⁺	City of Wolverhampton	3.36	B3As1	2.4	Low - Moderate
Ref: 486b (Housing) ⁺	City of Wolverhampton	21.11	B2As1	0.8	Moderate
Ref: 520 (Housing) ⁺	City of Wolverhampton	4.93	B2As1	1.3	Moderate
Ref: 537 (Housing) ⁺	City of Wolverhampton	40.7	B5As1	0.3	Very High
Ref: 537a (Housing-led mixed use) ⁺	City of Wolverhampton	21.69	B5As1	0.3	Very High
Ref: 683a (Housing) ⁺	Dudley	21.33	B59As1	4.0	Moderate - High

⁺ South Staffords hire site references for cross-boundary sites within Sub-parcel scenarios in the Black Country.

7.8 **Table 7.3** summarises the area of land which falls within each category of harm (excluding any identified absolute constraints).

Table 7.3: Total area of land assessed at each harm rating (excluding absolute constraints)

Authority	Harm Rating	Total Area of Land (ha)	Percentage of land
City of Wolverhampton	Very High	169.9	26.4
	High	0.0	0.0
	Moderate - High	96.2	14.9
	Moderate	8.6	1.3
	Low - Moderate	64.5	10.0
	Low	240.5	37.3
	Very Low	64.5	10.0
Dudley	Very High	755.4	57.7
	High	110.0	8.4
	Moderate - High	102.5	7.8
	Moderate	165.3	12.6
	Low - Moderate	39.1	3.0
	Low	102.9	7.9
	Very Low	33.4	2.6
Sandwell	Very High	214.6	44.0
	High	177.3	36.3
	Moderate - High	9.4	1.9
	Moderate	23.5	4.8
	Low - Moderate	16.2	3.3
	Low	27.6	5.7
	Very Low	19.5	4.0
Walsall	Very High	1,825.3	57.6
	High	867.7	27.4
	Moderate - High	197.1	6.2
	Moderate	42.2	1.3
	Low - Moderate	143.1	4.5
	Low	54.3	1.7
	Very Low	40.0	1.3
Total Black Country	Very High	2,965.1	52.9
	High	1,155.0	20.6
	Moderate - High	405.2	7.2
	Moderate	239.6	4.3
	Low - Moderate	262.9	4.7
	Low	425.3	7.6
	Very Low	157.3	2.8

7.9 **Table 7.4** summarises the area of land within promoted sites which falls within each category of harm (excluding any identified absolute constraints).

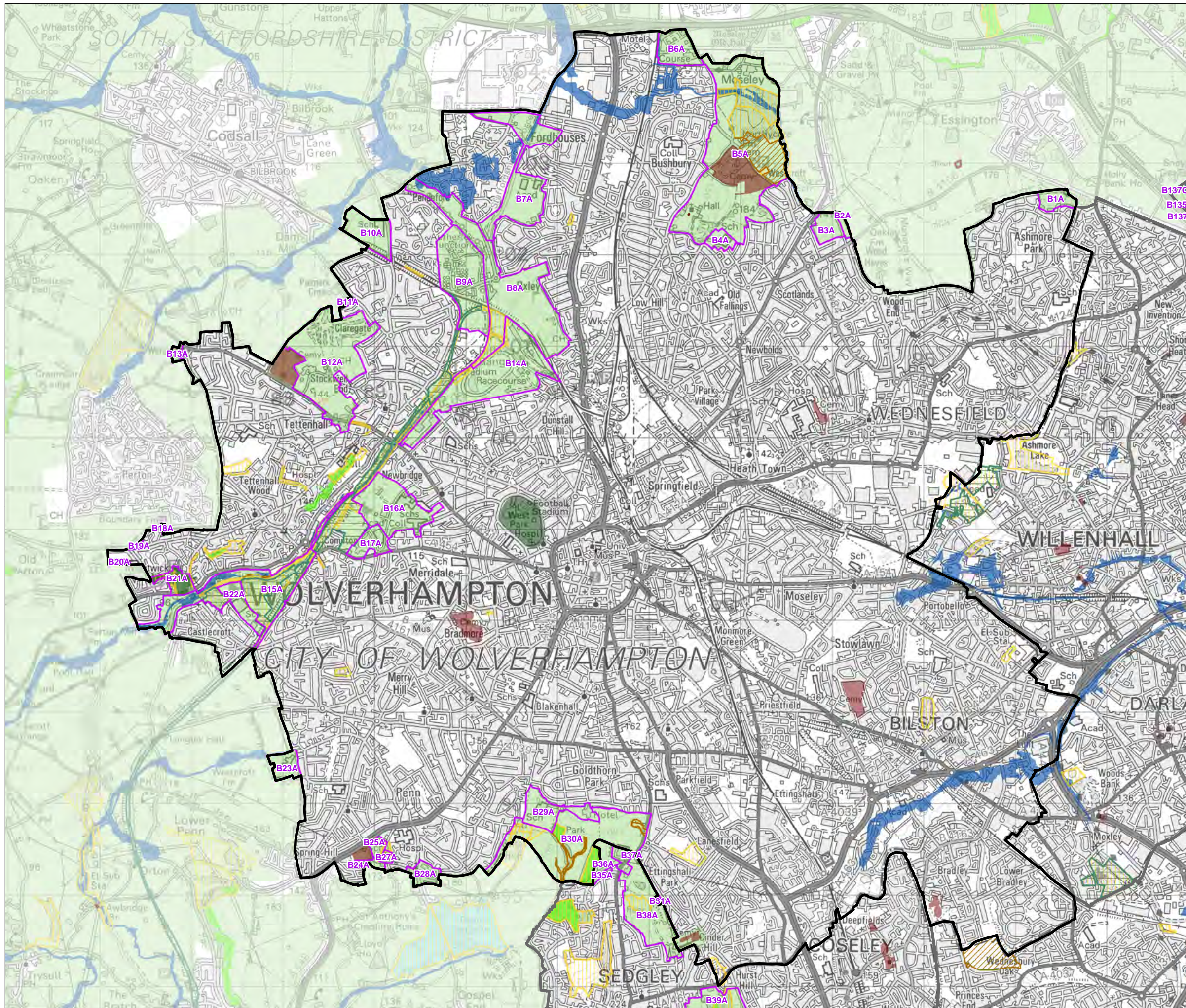
Table 7.4: Total area of land within promoted sites assessed at each harm rating (excluding absolute constraints)

Authority	Harm Rating	Total Area of Land within Promoted Sites (ha) ⁶⁴	Percentage of land ⁶⁴
City of Wolverhampton	Very High	82.4	63.7
	High	0.0	0.0
	Moderate - High	15.3	11.8
	Moderate	3.3	2.6
	Low - Moderate	18.3	14.2
	Low	6.5	5.0
	Very Low	3.5	2.7
Dudley	Very High	251.2	55.3
	High	18.8	4.1
	Moderate - High	90.1	19.8
	Moderate	81.7	18.0
	Low - Moderate	1.0	0.2
	Low	11.5	2.5
	Very Low	0.2	0.0
Sandwell	Very High	0.0	0.0
	High	27.0	89.7
	Moderate - High	2.4	8.0
	Moderate	0.6	2.0
	Low - Moderate	0.0	0.0
	Low	0.1	0.3
	Very Low	0.0	0.0
Walsall	Very High	414.8	55.9
	High	280.0	37.8
	Moderate - High	22.8	3.1
	Moderate	11.1	1.5
	Low - Moderate	0.3	0.0
	Low	5.8	0.8
	Very Low	6.9	0.9
Total Black Country	Very High	748.4	55.2
	High	325.8	24.0
	Moderate - High	130.6	9.6
	Moderate	96.7	7.1
	Low - Moderate	19.6	1.4
	Low	23.9	1.8
	Very Low	10.6	0.8

⁶⁴ Note: Where sites overlap, the areas of both sites have been counted within these totals.

Role of Green Belt Harm Assessment

- 7.10 As outlined above, consideration of the *harm* to Green Belt that could result from the release of land for development is an essential part of establishing the exceptional circumstances for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered, most notably sustainability and viability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in very high harm to the Green Belt.
- 7.11 In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In light of this, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies the relative variations in the harm to the designation.
- 7.12 The Study does not assess the cumulative impact of the release of multiple sub-parcel scenarios on the Green Belt as a whole. That lies outside the scope of this Study as there are numerous permutations of the scenarios and sites that could be considered for release.



Black Country Green Belt Study

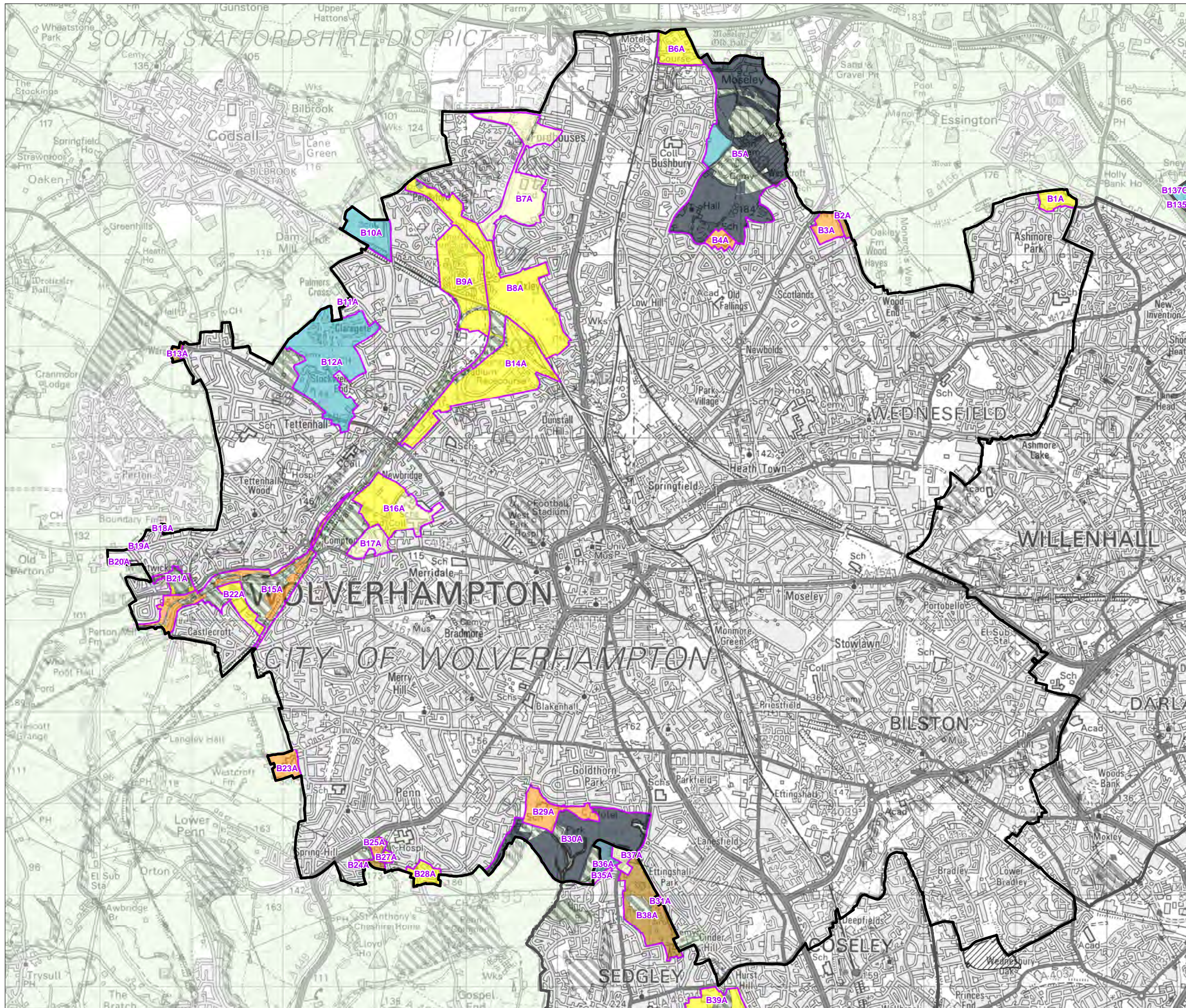
Figure 7.2a: Stage 2 Sub-Parcels, Absolute Constraints and Potential SINCs - City of Wolverhampton

- City of Wolverhampton Borough
- Other Local Authority
- Green Belt
- Stage 2 sub-parcel
- Cultural Heritage**
- Registered Parks and Gardens
- Scheduled Monument
- Natural Heritage**
- Ancient Woodland
- Local Nature Reserve
- Potential SINC addition
- Potential SINC removal
- SINC / SBI
- National Nature Reserve
- Site of Special Scientific Interest
- Special Area of Conservation
- Other**
- Burial Ground
- Common Land
- Flood Zone 3

Please note: Sites of Importance for Nature Conservation (SINC) are located only within the Black Country and Sites of Biological Importance (SBI) are located only within South Staffordshire. They are the equivalent of one another.

0 1 km





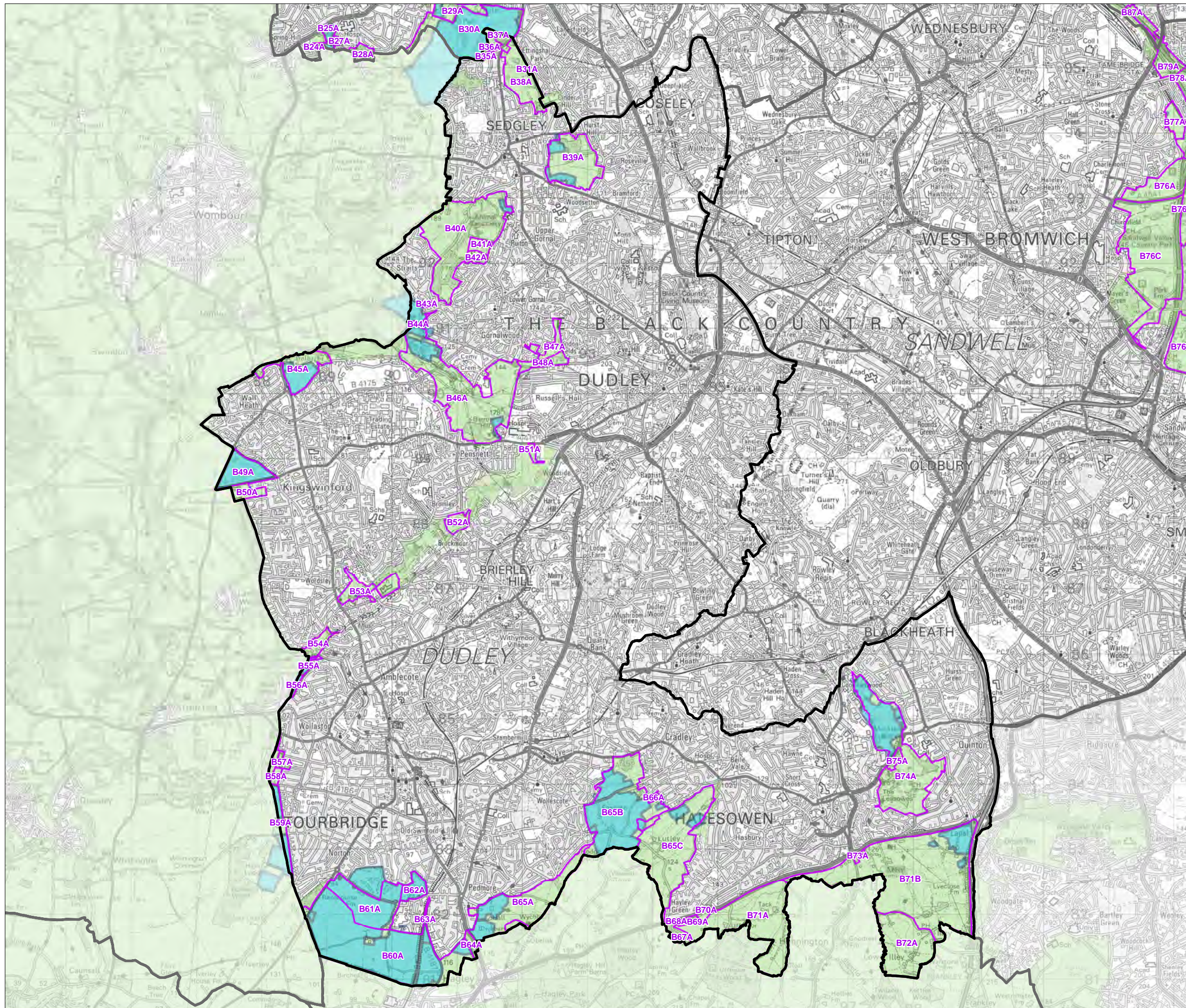
Black Country Green Belt Study

Figure 7.3a: Harm Assessment - City of Wolverhampton

- City of Wolverhampton Borough
 - Other Local Authority
 - Green Belt
 - Absolute constraints
 - Potential SINC addition
 - Potential SINC removal
 - Stage 2 sub-parcel
- Harm rating
- Very High
 - High
 - Moderate - High
 - Moderate
 - Low - Moderate
 - Low
 - Very Low






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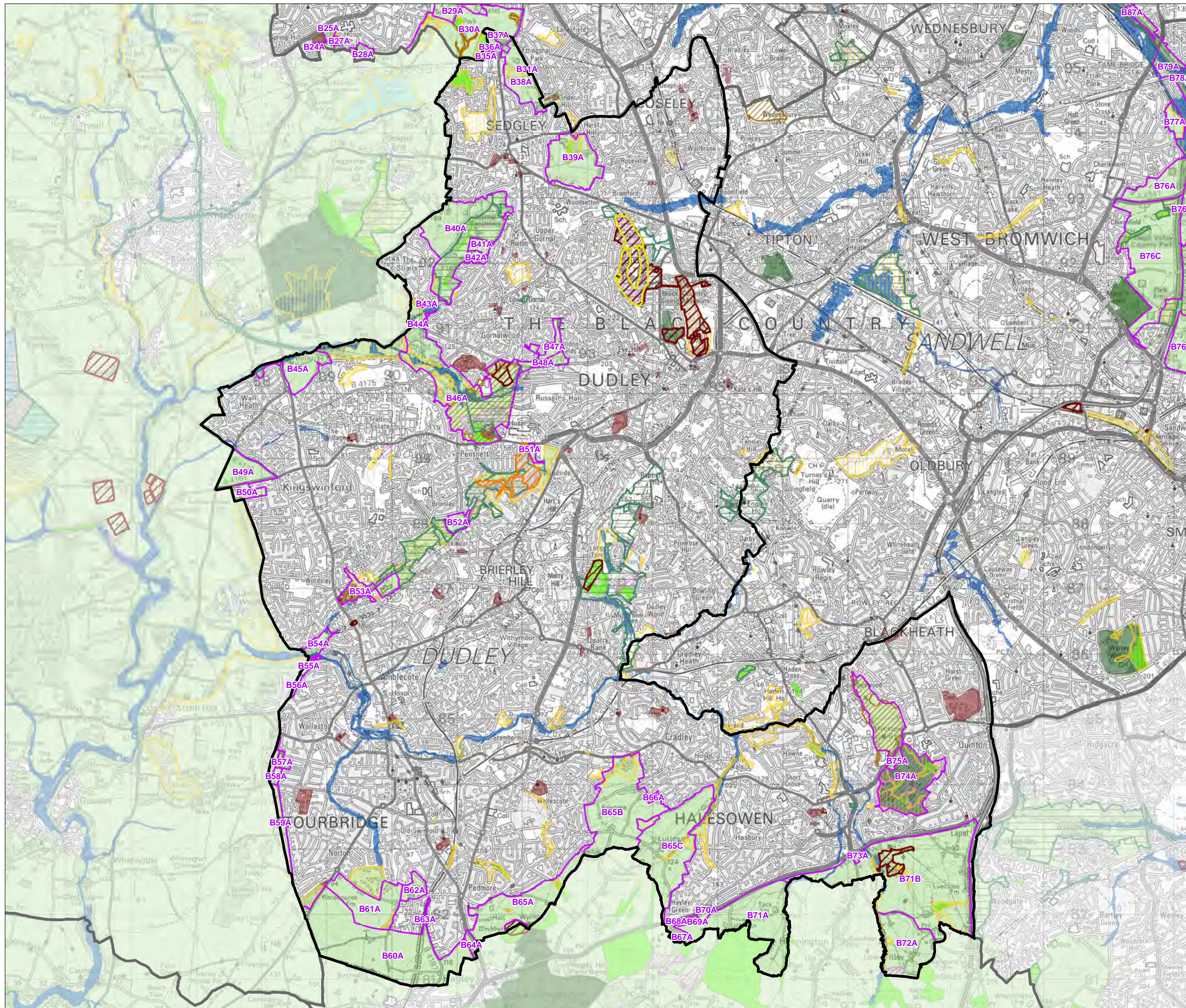
Black Country Green Belt Study

Figure 7.1b: Stage 2 Sub-Parcels and Promoted Sites - Dudley

-  Dudley Borough
-  Other Local Authority
-  Green Belt
-  Stage 2 sub-parcel
-  Promoted site

0 1.5 km



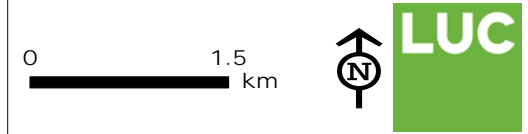


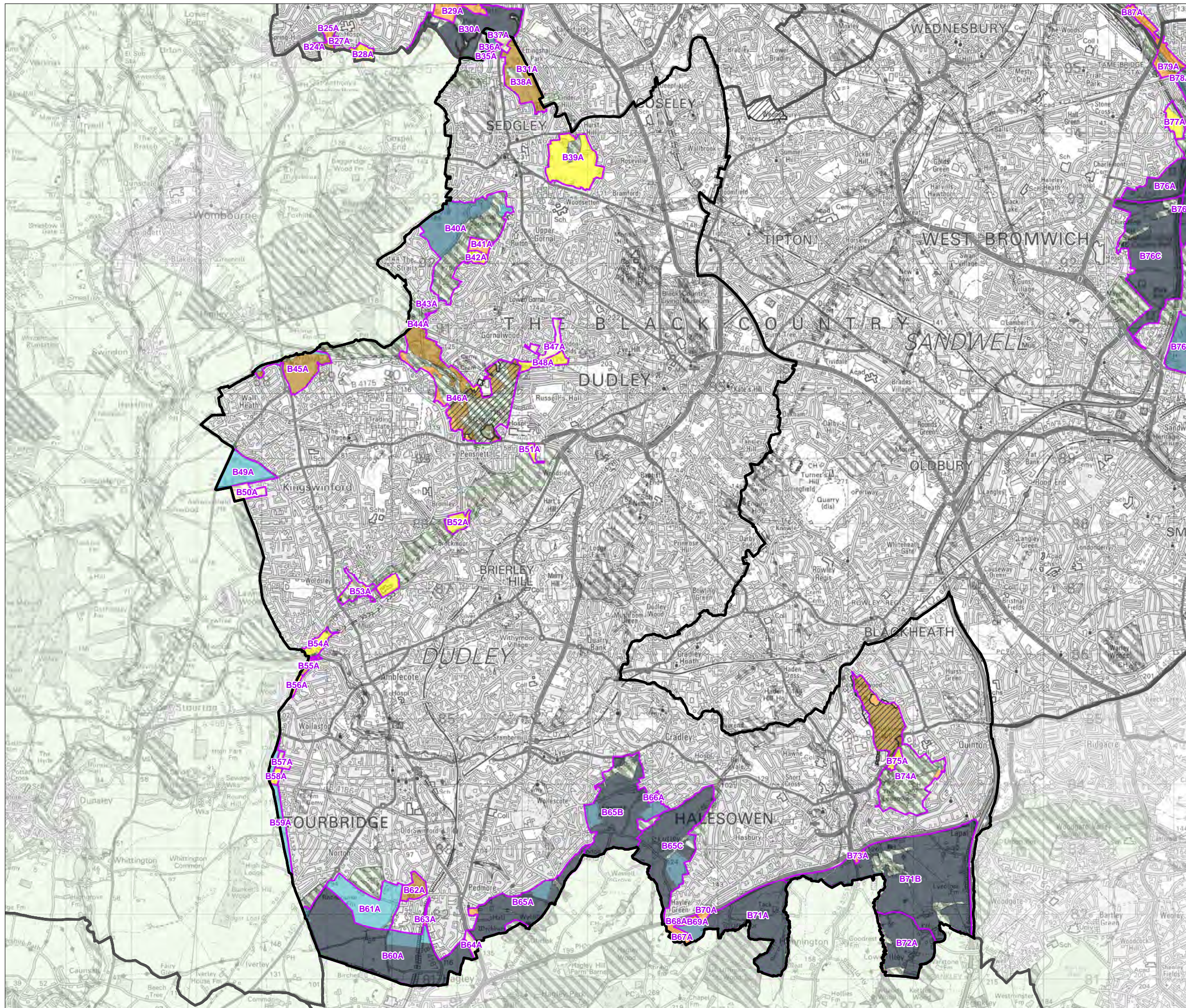
Black Country Green Belt Study

Figure 7.2b: Stage 2 Sub-Parcels, Absolute Constraints and Potential SINCs - Dudley

- Dudley Borough
- Other Local Authority
- Green Belt
- Stage 2 sub-parcel
- Cultural Heritage**
 - Registered Parks and Gardens
 - Scheduled Monument
- Natural Heritage**
 - Ancient Woodland
 - Local Nature Reserve
 - Potential SINC addition
 - Potential SINC removal
 - SINC / SBI
 - National Nature Reserve
 - Site of Special Scientific Interest
 - Special Area of Conservation
- Other**
 - Burial Ground
 - Common Land
 - Flood Zone 3

Please note: Sites of Importance for Nature Conservation (SINC) are located only within the Black Country and Sites of Biological Importance (SBI) are located only within South Staffordshire. They are the equivalent of one another.

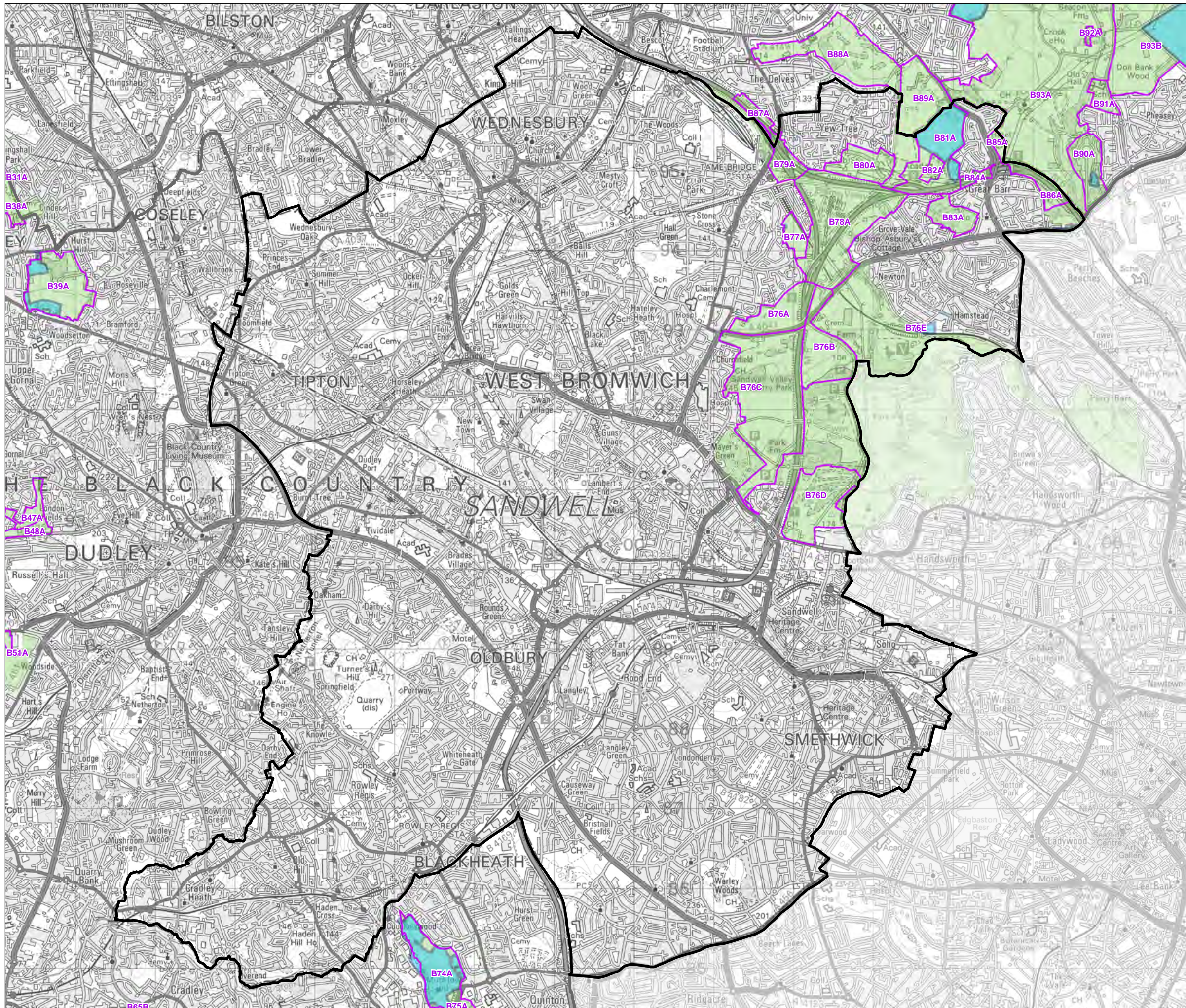




Black Country Green Belt Study






Figure 7.3b: Harm Assessment - Dudley

- Dudley Borough
 - Other Local Authority
 - Green Belt
 - Absolute constraints
 - Potential SINC addition
 - Potential SINC removal
 - Stage 2 sub-parcel
- Harm rating
- Very High
 - High
 - Moderate - High
 - Moderate
 - Low - Moderate
 - Low
 - Very Low

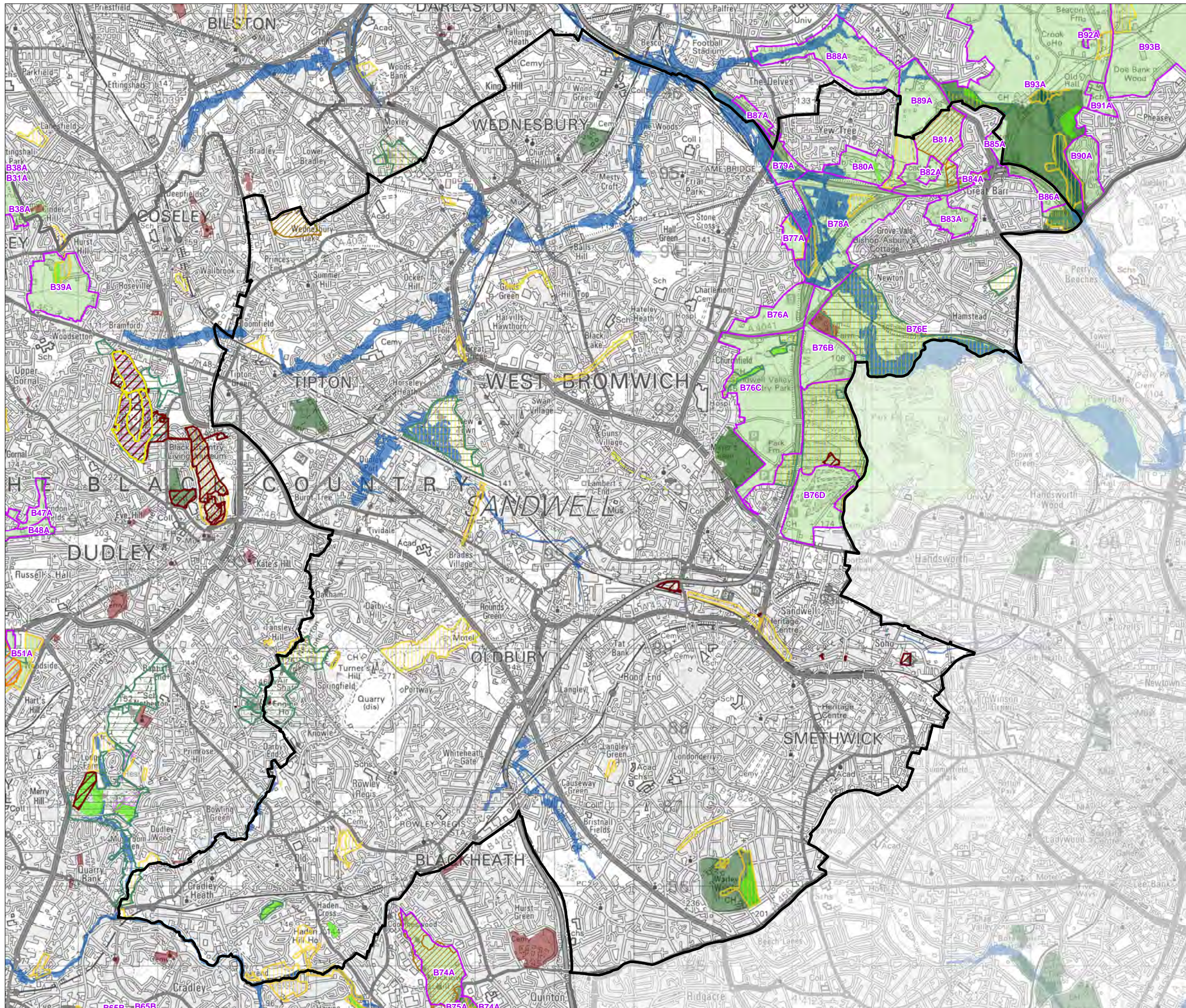


Black Country Green Belt Study

Figure 7.1c: Stage 2 Sub-Parcels and Promoted Sites - Sandwell

-  Sandwell Borough
-  Other Local Authority
-  Green Belt
-  Stage 2 sub-parcel
-  Promoted site



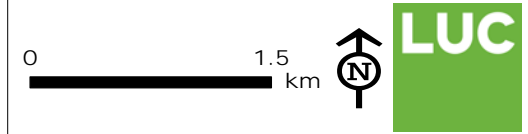


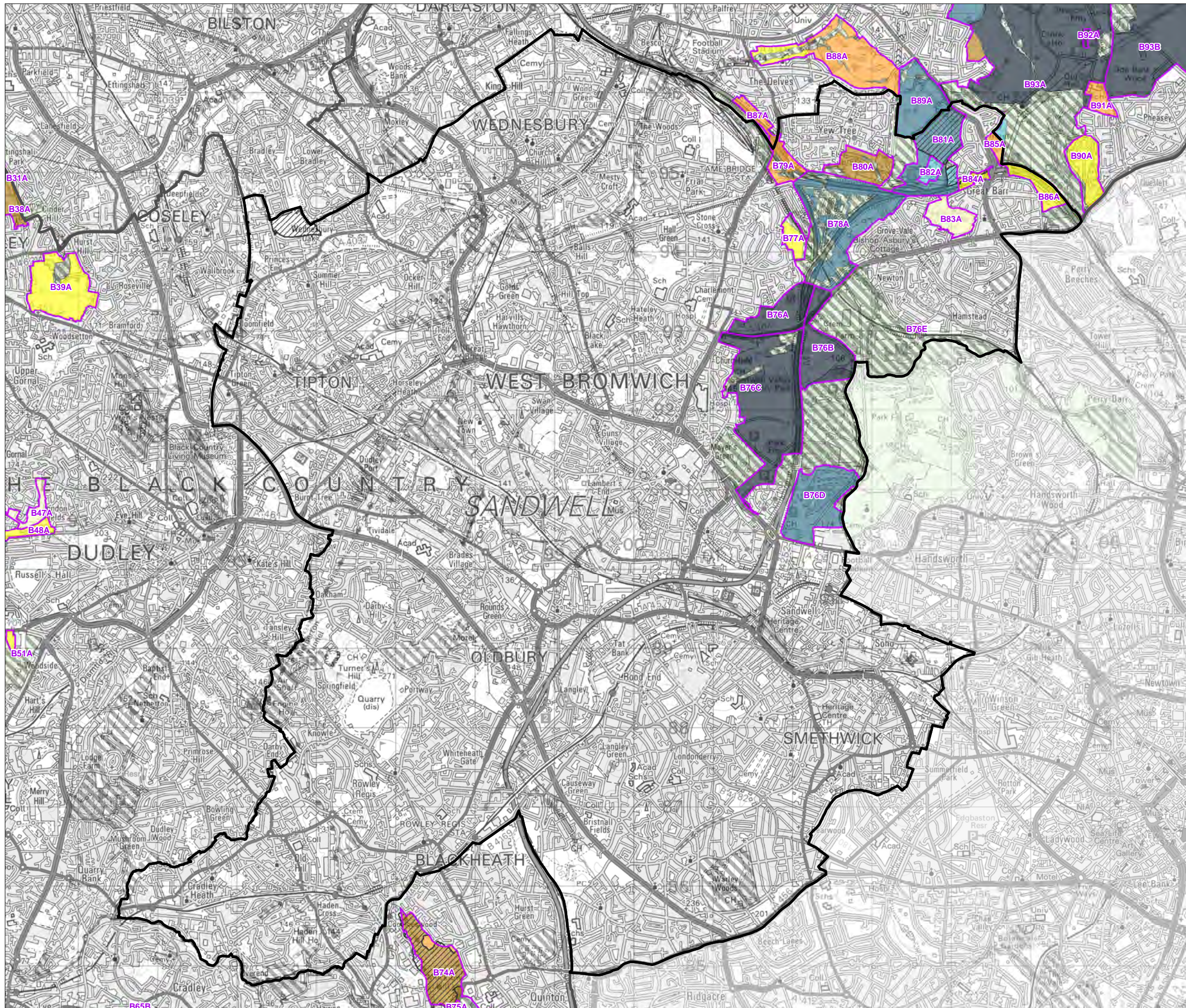
Black Country Green Belt Study

Figure 7.2c: Stage 2 Sub-Parcels, Absolute Constraints and Potential SINCs - Sandwell

- Sandwell Borough
- Other Local Authority
- Green Belt
- Stage 2 sub-parcel
- Cultural Heritage**
 - Registered Parks and Gardens
 - Scheduled Monument
- Natural Heritage**
 - Ancient Woodland
 - Local Nature Reserve
 - Potential SINC addition
 - Potential SINC removal
 - SINC / SBI
 - National Nature Reserve
 - Site of Special Scientific Interest
 - Special Area of Conservation
- Other**
 - Burial Ground
 - Common Land
 - Flood Zone 3















Please note: Sites of Importance for Nature Conservation (SINC) are located only within the Black Country and Sites of Biological Importance (SBI) are located only within South Staffordshire. They are the equivalent of one another.

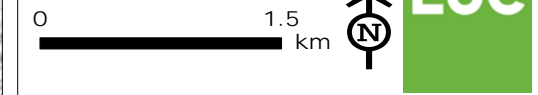




Black Country Green Belt Study

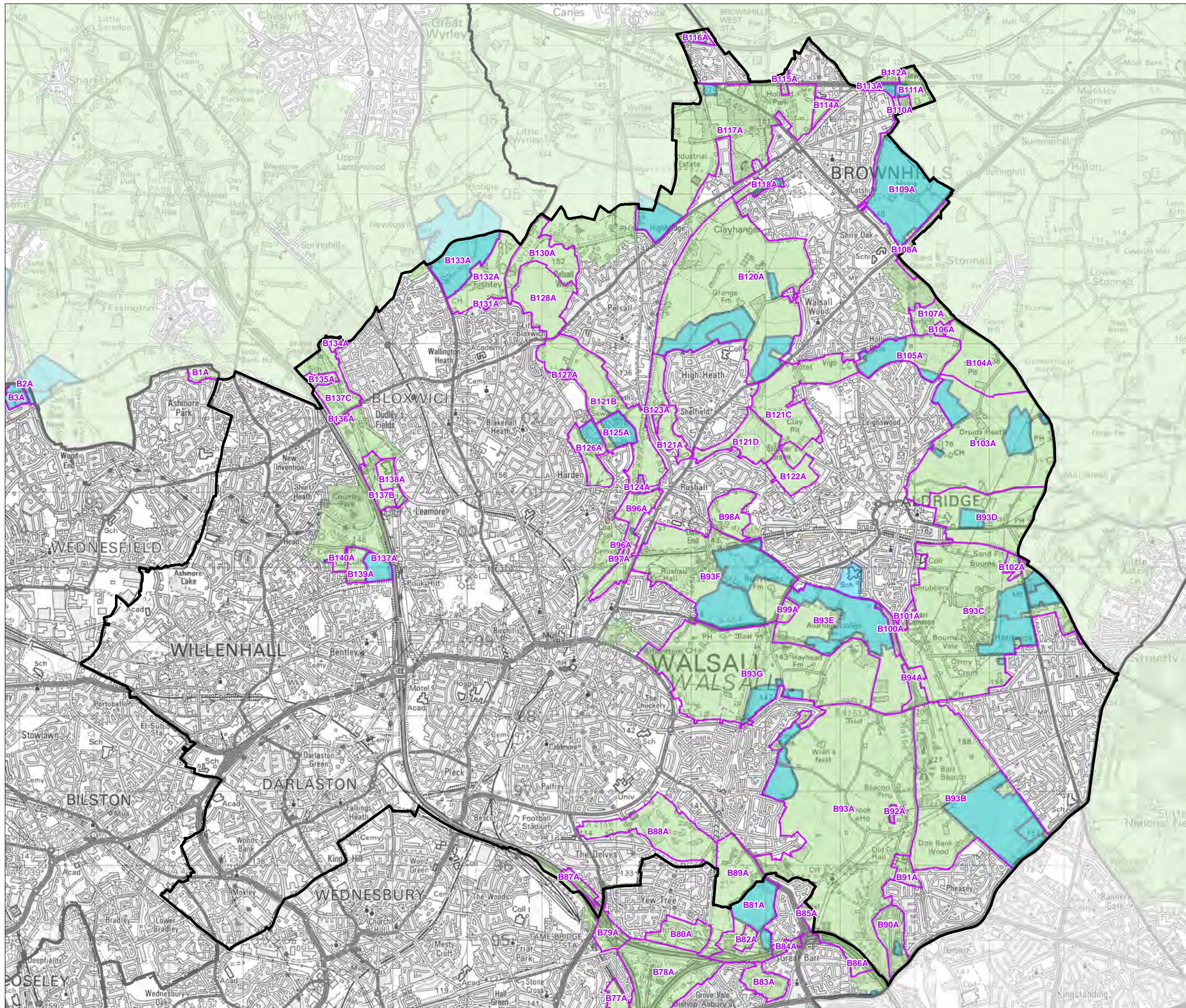
Figure 7.3c: Harm Assessment - Sandwell






-  Sandwell Borough
 -  Other Local Authority
 -  Green Belt
 -  Absolute constraints
 -  Potential SINC addition
 -  Potential SINC removal
 -  Stage 2 sub-parcel
- Harm rating
-  Very High
 -  High
 -  Moderate - High
 -  Moderate
 -  Low - Moderate
 -  Low
 -  Very Low



Black Country Green Belt Study

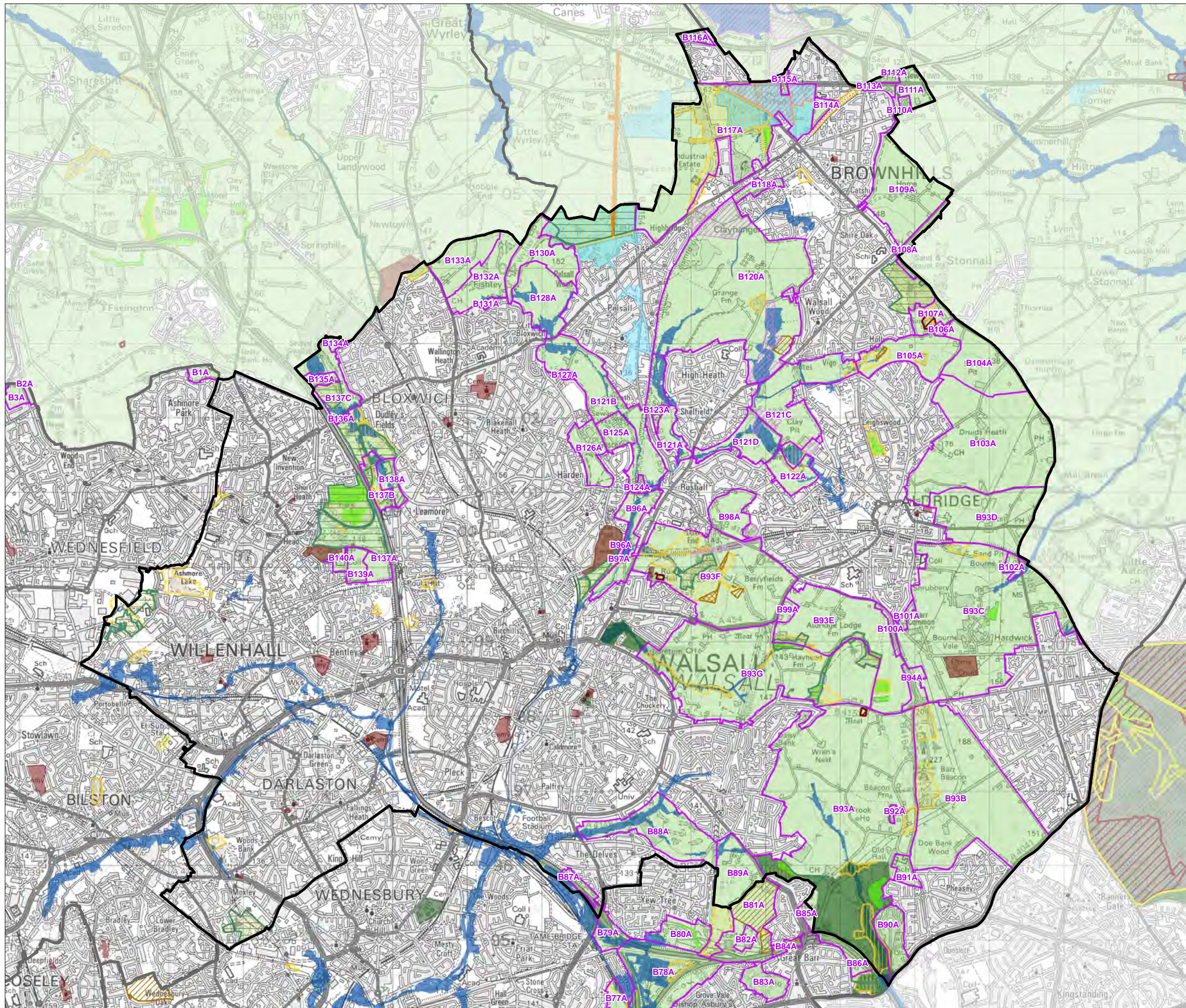
Figure 7.1d: Stage 2 Sub-Parcels and Promoted Sites - Walsall



-  Walsall Borough
-  Other Local Authority
-  Green Belt
-  Stage 2 sub-parcel
-  Promoted site


















0 1.5 km





Black Country Green Belt Study

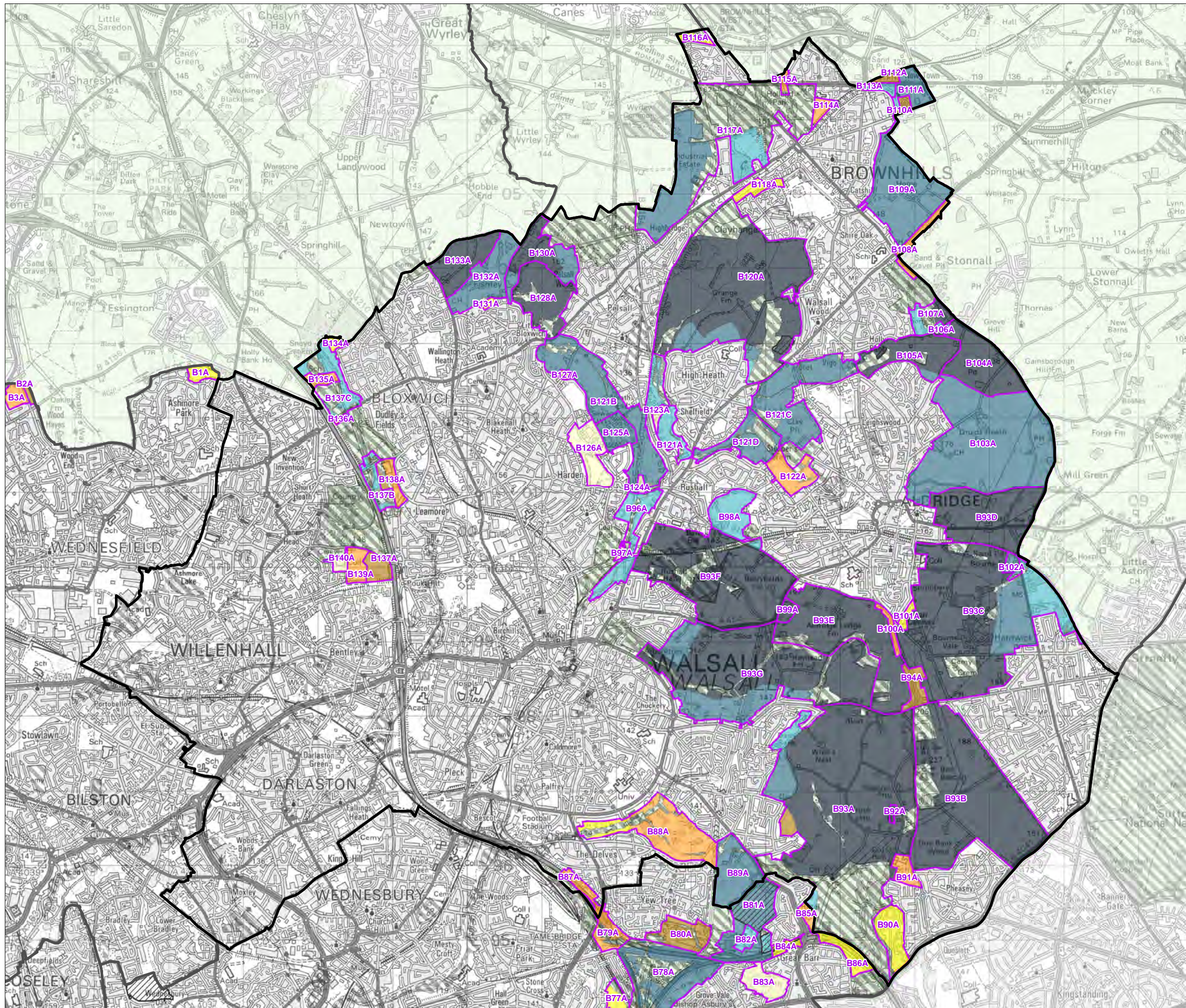
Figure 7.2d: Stage 2 Sub-Parcels, Absolute Constraints and Potential SINCs - Walsall

-  Walsall Borough
-  Other Local Authority
-  Green Belt
-  Stage 2 sub-parcel
- Cultural Heritage**
-  Registered Parks and Gardens
-  Scheduled Monument
- Natural Heritage**
-  Ancient Woodland
-  Local Nature Reserve
-  Potential SINC addition
-  Potential SINC removal
-  SINC / SBI
-  National Nature Reserve
-  Site of Special Scientific Interest
-  Special Area of Conservation
- Other**
-  Burial Ground
-  Common Land
-  Flood Zone 3

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0 1.5 km





Black Country Green Belt Study

Figure 7.3d: Harm Assessment - Walsall

- Walsall Borough
 - Other Local Authority
 - Green Belt
 - Absolute constraints
 - Potential SINC addition
 - Potential SINC removal
 - Stage 2 sub-parcel
- Harm rating
- Very High
 - High
 - Moderate - High
 - Moderate
 - Low - Moderate
 - Low
 - Very Low

0 1.5 km

Part D: Making Changes to the Green Belt



8 Making Changes to the Green Belt

Introduction

- 8.1 The following chapter sets out the key steps that the Councils should consider if there is an identified need to release land from the Green Belt. The chapter also sets out potential mitigation measures that could be applied to reduce the potential harm to the Green Belt, if land is released. This is followed by a discussion of the potential opportunities for enhancing the beneficial use of the Green Belt (in line with paragraph 141 of the NPPF). However, it should be noted that this Chapter does not contain an exhaustive list of potential mitigation measures or enhancement opportunities. It is therefore recommended that mitigation and enhancement are carefully considered when more detailed information about proposed developments is available.

Making Changes to the Green Belt

- 8.2 The NPPF requires changes to the Green Belt to be made through the Development Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.
- 8.3 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes⁶⁵. In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, higher performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.
- 8.4 Before concluding that 'exceptional circumstances' exist to justify changes to the Green Belt, paragraph 137 of the NPPF states that local authorities should demonstrate that all other 'reasonable options' for meeting its identified need for development have been considered. In particular local authorities need to consider whether their strategy:
- 1) makes effective use of suitable brownfield sites and underutilised land, which is a key priority in the Black Country;
 - 2) optimises the density of development in town and city centres and other locations well served by public transport; and
 - 3) explores whether other authorities can help to meet some of the identified development requirement.

⁶⁵ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

- 8.5 Should the Councils decide to release land from the Green Belt, careful consideration also needs to be given to the form of the amended Green Belt boundaries. As set out in Para 139 of the NPPF:

“When defining Green Belt boundaries, plans should:

- ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- not include land which it is unnecessary to keep permanently open;*
- 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;*
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Mitigation to Reduce Harm to Green Belt

The concept of mitigation

- 8.6 One of the factors weighed up in the judgement of harm resulting from the release of a Green Belt area, is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would rate in terms of its contribution to Green Belt purposes were the area in question to be urbanised i.e. would its contribution be weakened? In many cases this is a key factor in the judgement: a site might in itself be small but its development could represent a more significant change than its physical area might suggest if, for example, it resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.
- 8.7 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area. However, any release of Green Belt land will still require ‘exceptional circumstances’ to be demonstrated.
- 8.8 Mitigation could apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

Mitigation themes

- 8.9 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. The Green Belt purposes are considered to relate to the relationship between the land area in question, developed land, and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape/physical elements, including boundary features (in either separating the area from, or connecting it to) built-up areas and the wider countryside.
- 8.10 **Table 8.1** below lists some mitigation measures that could be considered as part of the planning and development process. Which mitigation measures are the most appropriate will vary, depending on local circumstances.

Table 8.1: Potential measures to mitigate harm to Green Belt

Mitigation measure	Benefits	Considerations
Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance.	Maintaining sense of separation between urban and open land.	A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of 'breaches' in such boundaries.
Strengthen boundary at weak points – e.g. where 'breached' by roads	Reducing opportunities for sprawl	The use of buildings and landscaping can create strong 'gateways' to strengthen settlement-edge function
Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt.	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within the Green Belt (e.g. major roads).	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents.
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.	Reducing perception of urbanisation.	This may however have implications in terms of reducing housing yield.
Consider ownership and management of landscape elements which contribute to Green Belt purposes.	Ensuring permanence of Green Belt.	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).
Enhance visual openness within the Green Belt.	Increasing perception of countryside.	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Preserve/enhance landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character.	Preserving setting and special character of historic towns.	Landscape character and historic settings assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.

Mitigation measure	Benefits	Considerations
Enhance access within the Green Belt.	Increasing perception of countryside.	Uses of the countryside that permit an appreciation of it as a connected area with valued characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoiding truncation by major roads, or provision of access along the Green Belt boundary to strengthen its role.
Improve management practices to enhance countryside character.	Increasing strength of countryside character.	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements.	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain/create separation between existing washed-over settlement and new inset settlement.	Minimising urbanising influences that could weaken the justification for retaining the washed-over settlement's status.	Ensure that the gap is sufficiently wide to maintain a sense of separation.
Design road infrastructure to limit perception of increased urbanisation associated with new development.	Reducing perception of urbanisation.	Increased levels of 'activity' can increase the perception of urbanisation.
Use sustainable drainage features to define/enhance separation between settlement and countryside.	Strengthening separation between urban and open land.	Need to determine if local topography and ground conditions are suitable.

Beneficial Use of Green Belt

- 8.11 The purposes of Green Belt do not make any reference to the quality or use of land falling within the designation, but paragraph 141 of the NPPF, states that:
- “Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*
- 8.12 Furthermore, paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should ‘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’. This is in addition to measures required to mitigate harm to the Green Belt caused by removing land from it. This could be achieved through legal agreements in conjunction with the release of land and planning consent for development, or through strategic enhancement initiatives. National Planning Practice Guidance endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, such as:
- *“new or enhanced green infrastructure;*
 - *woodland planting;*
 - *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
 - *improvements to biodiversity, habitat connectivity and natural capital;*
 - *new or enhanced walking and cycle routes; and*
 - *improved access to new, enhanced or existing recreational and playing field provision.”*
- 8.13 The guidance also endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify such appropriate compensatory improvements.
- 8.14 The NPPF suggests different types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary/buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.

Potential opportunities to enhance use

- 8.15 Some of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land’s future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 8.2** below.
- 8.16 Beneficial uses could be achieved through legal agreements in conjunction with the release of land and consent for development.

Table 8.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity. The Black Country Authorities have commissioned a study on ecological and nature recovery networks, and therefore linkages could be provided to such identified environmental networks, as well as existing Nature Improvement Areas. There may also be opportunities to link enhancements with requirements to deliver 'biodiversity net gain' associated with development proposals.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

- 8.17 Many of the beneficial uses outlined in **Table 8.2** could be identified via a Green Infrastructure (GI) Study. A Black Country Environmental Infrastructure Study was published in 2009 and there are a number of other strategy documents that have been prepared by the local authorities (e.g. Open Space/ Green Space Strategies, Biodiversity Action Plans etc.) that could be used as a starting point to prepare an updated GI strategy for the Black Country. This would identify the key opportunities for landscape, access, recreation and biodiversity enhancements within the Green Belt and beyond.
- 8.18 It is noted however, that Local Authorities may still be able to protect features such as open spaces, leisure facilities, burial grounds and nature conservation sites through other policy approaches/designations.

Conclusion

- 8.19 The boundary of the Green Belt in the Black Country is complex and the product of a long history. There are areas where the current boundary does not match development on the ground. There will be cases therefore where the Black Country authorities will need to make detailed corrections and amendments to the current boundary and the Black Country Plan will provide the mechanism to do this.
- 8.20 It is also recommended that policy guidance, or where necessary masterplans should be prepared as part of, or following on from the Development Plan process. Masterplans should draw on the findings of the Green Belt Study and any detailed site-based Green Belt assessment work to indicate development areas, new permanent Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments. Such an approach, together with specific policies for the development of the land, would help to minimise harm to the remaining Green Belt and help to compensate for any loss of Green Belt land.

Appendix 1

Duty to Cooperate Consultation - Comments on Methodology

This Appendix provides a summary of the comments received in the Duty to Cooperate consultation on the proposed Green Belt Review methodology.

Stakeholder	Comments	LUC Response
Cannock Chase District Council	<p>Would be useful to see what parcels are to be defined and assessed.</p> <p>Support the study not covering parcels outside of study area.</p> <p>Questioned how cross boundary call for sites are treated. Would welcome further involvement in the assessment process.</p>	<p>The parcels are an output of Stage 1 which considers variations in the contribution to the Green Belt Purposes. Maps showing the location of the parcels are published within the report.</p> <p>Noted.</p> <p>Where 'Call for Sites' sites cross boundaries, we note this as part of the harm assessment. The study undertaken for Cannock Chase DC in 2016 considered contribution to Green Belt purposes, but did not include an assessment of harm associated with the release of land.</p>
	<p>Whilst some urban areas not included in defined large built up areas/towns definitions assume they will still be taken into account as part of wider 'openness' considerations i.e. absence/presence of built form and merging of 'towns' (as per para 2.22)?</p>	<p>Yes. The report details in Figure 3.1 the settlements which have been defined as the large built up area, and in Figure 3.2 and Table 3.1 the settlements which have been defined as towns in the assessment of Purpose 2.</p> <p>Smaller urban areas that are not considered to form part of the large built up area or constitute towns are considered with regards to their urbanising impact affecting sprawl (Table 4.2: Purpose 1 assessment criteria), their impact on the perceived separation of towns (Table 4.3: Purpose 2 assessment criteria), and their impact on 'openness' (Table 4.4: Purpose 3 assessment criteria).</p>
	<p>Para 2.27- will this approach only assume those use classes specified (agriculture, forestry, outdoor recreation etc.) are appropriate i.e. any housing or employment related development outside of these categories is not appropriate (concerned a wider range of uses could be considered as appropriate by default, under 'redevelopment')?</p>	<p>See para 3.27 of this report. Caution has been exercised in the application of what is defined as an appropriate use. It is not possible within a Strategic GB study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut eg for example buildings for agriculture and forestry are deemed to be appropriate development in absolute terms regardless of whether they preserve the openness or conflict with the GB purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, we have taken a considered view on the extent to which the proposed land use has affected the GB purposes for example by affecting openness, or encroaching on the perception of countryside ie the sense of distinction between the urban area and countryside etc.</p> <p>Housing and employment related development will be considered as inappropriate.</p>
	<p>Support identification of Cannock as historic town in context (para 2.35).</p>	<p>Cannock was considered further as part of the assessment of contribution to Purpose 4. As reported in the South Staffordshire Green Belt Study: <i>"Cannock was a small rural community until expansion in the latter part of the 19th century in association with the mining industry. The Cannock Conservation Area Appraisal notes the extent of containment of the historic core by later development, and makes no reference to the role of countryside in</i></p>

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		<p><i>forming a setting or contributing to character. This core is some distance from prominent landscape features – notably Cannock Chase to the north and, within South Staffordshire, the wooded heathland of Shoal Hill - and although there is some intervisibility Cannock does not derive any 'special character' from a relationship with Green Belt landscape."</i> (</p> <p>See also below.</p>
	<p>Para 2.43 - includes an error, as Cannock Chase Green Belt study did include Rugeley as an historic town.</p>	<p>Amend Green Belt report para 3.38 (which reflected para. 2.42-3 of the method statement) to correct the reference to the identification of Cannock and Rugeley as historic towns in the Cannock Chase Green Belt Study: <i>The Green Belt assessment in the neighbouring District of Cannock Chase identified areas of land within that district which contributed to the setting and special character of Cannock and Rugeley. However, no land within the Black Country Green Belt is considered to contribute to the setting and special character of these towns, given the separation and distance involved.</i></p>
	<p>Para 3.8 refers to appropriate development – see comments regarding Para 2.27 above.</p>	<p>See response above.</p>
	<p>Support clear separation of landscape sensitivity considerations from Green Belt purposes assessment.</p>	<p>Noted</p>
<p>Shropshire Council</p>	<p>The council wish to ensure that the Shropshire and South Staffordshire studies are complementary and any conflicting references or assessment outcomes are minimised or can be substantiated to the extent necessary to support the Examination of the Shropshire Local Plan.</p>	<p>Noted</p>
	<p>The Shropshire Local Plan Preferred Option Proposals have already consulted on significant potential Green Belt releases around Shifnal and to the East of Bridgnorth and Albrighton (with more limited release at Alveley) and will consider potential sites put forward within the Green Belt in the M54 corridor, which have the potential to meet cross boundary growth needs.</p>	<p>Noted</p>
	<p>A different approach to that used in Shropshire is being employed for the BC & SS Stage 1 assessment, which will involve the identification of parcels based on outcomes from an initial assessment of varying contributions of different areas to the NPPF defined GB purposes.</p>	<p>A summary of key points from neighbouring Green Belt studies is included within the Green Belt Study Reports (Table 2.2).</p> <p>There are some differences in the findings of the Stage 1 studies with regard to Purpose 2 but this relates to the process which was used to define the parcels. The Stage 1 ratings for the Broad Areas in the Shropshire study which border South Staffordshire are based on an average across the parcels which differs from the approach used in the Black Country South Staffordshire Study. Both approaches are equally valid and justified. There are no</p>

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	<p>Points were raised in relation to the method used for the Shropshire and South Staffordshire / Black Country Green Belt Studies. Attention was drawn to the need to consider historic towns in neighbouring authorities. Reference was made to the consideration of distance to settlements beyond boundaries in the Shropshire GB Study.</p> <p>Subject to adequate justification, support the LUC approach in that it will provide a broader and linked up picture of the West Midlands Green Belt.</p>	<p>differences in the approaches used for the Stage 2 studies.</p> <p>The studies are consistent in their definition used to assess the GB purposes and account has been taken of towns outside of the Black Country, including in respect of Green Belt purpose 4.</p> <p>Noted.</p> <p>Noted.</p>
Historic England	Historic England has no concerns in relation to the proposed methodology.	Noted
North Warwickshire Borough Council	Questioned how the Green Belt Study compares with the Coventry and Warwickshire Green Belt Study carried out by LUC – the method statement for that work was to be the basis for all other studies in the region.	<p>The Coventry and Warwickshire Joint Green Belt Study and the Black County and South Staffordshire Study both represent strategic assessments of the Green Belt designed to draw out variations in contribution of land to the five Green Belt purposes.</p> <p>The Black County and South Staffordshire Study is split into two stages, representing two scales of assessment. Stage 1 draws out strategic variations in the ‘contribution’ of Green Belt land to the Green Belt characteristics and purposes (like the Coventry and Warwickshire Joint Green Belt Study), but Stage 2 involves a more focused assessment of the potential ‘harm’ of removing specific areas of land, including specific development sites, from the Green Belt.</p>
Wildlife Trust	<p>Welcomes approach to ecological constraints, but would like to see Sites of Local Importance for Nature Conservation (SLINC) added to the list of ‘absolute’ environmental constraints, and the inclusion of the Nature Improvement Area (NIA) Strategy 2017 – 2022 within the identification or evaluation of assessment areas for stage 2 green belt assessment.</p> <p>As a whole the ecological network map allows for a landscape scale approach with assessing areas of constraints ensuring that the release of a site from the green belt will not result in the impact to a significant ecological corridor or priority habitat within the regional landscape.</p>	<p>The Black Country Study has gone further than recent work for the Housing Market Area in taking SINC status to be an absolute constraint on development. SLINC are locally designated sites of a lesser status, and details of impacts and potential mitigation will be a matter for the local authorities.</p> <p>It is not appropriate to consider the NIA strategy core areas as an absolute constraint in the Green Belt study. However, NIAs are cited as one way of increasing biodiversity in the Green Belt in the context of improving the beneficial use of the Green Belt (Black Country Green Belt Study, Chapter 8, Table 8.2).</p>