Staffordshire authorities

Staffordshire Green Belt Assessment

Final report

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Executive Summary

Each of the five Local Authorities in Staffordshire that contain the West Midlands Green Belt are facing significant challenges of how to accommodate the scale of housing and employment development given the constraints they have, including the West Midlands Green Belt, the Cannock Chase National Landscape and limited urban capacity. Each of the authorities are at a different stage of their Local Plan preparation which will seek to address this challenge and satisfy the Government's policy requirements to plan positively for growth. The 2024 revision of the National Planning Policy Framework (NPPF) reopened the consideration of Green Belt in preparing a Local Plan, particularly where places cannot meet their identified need for homes, commercial and other development.

Arup was appointed by Cannock Chase District Council, Lichfield District Council, South Staffordshire Council and Tamworth Borough Council to a undertake a Green Belt Assessment (GBA) to fully understand the impact of the changes to the NPPF, and the consideration needed through the preparation of each of their Local Plans. The GBA comprises an assessment of the West Midlands Green Belt that falls within Staffordshire (including the land within Stafford Borough Council's administrative area) against the five purposes of the Green Belt as defined in the NPPF, and to consider if those results along with nationally recognised environmental constraints could lead to the identification of potential grey belt.

The methodology used was informed by best practice and experience elsewhere, as well as key messages from recent planning appeal decisions, particularly those since the changes introduced by the NPPF 2024. The assessment has also had regard to the draft NPPF consultation that was released in December 2025, with the implications considered where relevant, noting the potential removal of footnote 7 constraints from the grey belt definition. However, this GBA remains relevant as the aims and purposes of the Green Belt have not been proposed to fundamentally change in national policy.

In total 302 assessments (286 parcels and 16 broad areas) were carried out across the study area, including parcels identified next to the large built up areas, towns, villages and inset employment locations, and broad areas across the remaining locations. The division of the number of parcels and broad areas is not equal across the authorities which reflects the different size and scale of each authority area as well as the amount of Green Belt within them.

The assessment has revealed the following key conclusions:

- The overall assessment identified 85% of the parcels making a strong or moderate contribution. However, there was an east-west divide across the study area, with more strongly performing parcels in the eastern section of the study area from the western edge of Cannock onwards. There were notable clusters of strongly contributing parcels around Burntwood, Cannock, Lichfield City and Rugeley. Those that made a weak contribution were generally as a result of having some existing development, undergoing development or having a land use which significantly impacts on the parcel's openness.
- The number of parcels which made a contribution to Purpose A, B or D varied depending on the location of the parcels. However, 285 of the 286 parcels made a contribution to Purpose C, with 76% of these making a strong contribution.
- 177 parcels were identified as being potential grey belt, with the majority having at least some extent of a footnote 7 constraint. Of those not identified as potential grey belt, 94 parcels were ruled out due to strongly contributing to either Purpose A, B or D, and 15 were ruled out due to the majority of the parcel (over 80%) being covered by a footnote 7 constraint.
- Parcels around inset villages were largely identified as potential grey belt, despite scoring strongly for their openness and role in safeguarding the countryside from encroachment (Purpose C). This follows the approach required by the NPPF.
- For the broad areas, eight were assessed as making a strong overall contribution to the Green Belt, with the remaining eight assessed as making a moderate overall contribution. Potential grey belt was only identified in one of the broad areas, as its scale was considered similar to some parcels.

The GBA did not consider any specific development proposals and was conducted on the basis that the full extent of the parcel or broad area was developed (with no regard given to impact on the land outside of the assessment boundary or the potential impact of nearby constraints). Whilst this GBA can provide context to decisions on planning applications, such schemes would require site specific assessments to show how the requirements of national Green Belt policy are addressed.

Overall, this GBA is important at the strategic level of plan making and provides an understanding about how this area of the West Midlands Green Belt performs against the requirements of the updated NPPF. It is the first step for the Councils to consider if they need to release sites from the Green Belt to meet any development needs in future Local Plan. Next steps have been identified should this be the case, including the need to undertake an assessment of sites in the Green Belt as part of a clear site selection methodology (including identification of grey belt sites), and to develop an exceptional circumstances case to justify the release of Green Belt land for development through the Local Plan process.

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1. Introduction

1.1 Study purpose

Ove Arup & Partners Ltd (Arup) has been appointed by the Staffordshire authorities of Cannock Chase District Council (CCDC), Lichfield District Council (LDC), Tamworth Borough Council (TBC) and South Staffordshire Council (SSC) (known collectively as 'the Councils') to undertake a Green Belt Assessment (GBA). It will form part of the evidence base and support the preparation of each authorities' Local Plan. The GBA comprises the following assessment of:

- the West Midlands Green Belt that falls within the Councils authority boundaries and the West Midlands Green Belt within Stafford Borough Council's (SBC) administrative boundary[1] against the purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF, 2024)[2], and
- Consideration of grey belt.

Each authority is at a different stage of Local Plan preparation, with each area facing significant challenges of how to plan for the increase in Local Housing Need (LHN) following the update to the NPPF in December 2024 and the introduction of a new standard method for calculating housing needs. To address this, the authorities will need to seek to satisfy the Government's policy requirements to plan positively for growth, whilst also being fairly constrained due to the West Midlands Green Belt, the Cannock Chase National Landscape and limited urban capacity. In addition, the Councils are within the Greater Birmingham and Black Country Housing Market Area (HMA), which has historically faced significant housing shortfall particularly across Birmingham and the Black Country. There is also significant pressure for many neighbouring authorities across the HMA where the LHN has substantially increased. Therefore, it may not be possible to accommodate the level of growth required within each authority without looking to release some Green Belt land.

The Councils have commissioned this work to fully understand the impact of the changes to the NPPF and the impact it can have on the preparation of its Local Plan and decisions it will need to make on planning applications. This study will help provide the evidence to enable the authorities to make robust decisions.

Local Planning Authorities (LPAs) hold a Duty to Cooperate on strategic issues in the Local Plan, such as Green Belt. The potential release of any Green Belt land within Staffordshire may also impact on the role of the Green Belt in adjoining authority areas as part of the wider West Midlands Green Belt. As a result, views from neighbouring authorities on the methodology for this assessment were sought.

1.2 Role of a Green Belt Assessment

The purpose of a GBA is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF. The LPA then takes the findings of the assessment into account alongside other evidence in making decisions about the Local Plan strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

A GBA forms an important part of the evidence base. It helps an LPA determine the manner and degree to which change in the Green Belt should be considered without undermining the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place. Additionally, through a GBA grey belt land should be identified.

Typically, a GBA is undertaken in two stages. The first stage examines the performance of an area's Green Belt in its entirety looking at broad areas/parcels, while the second stage is more granular and examines the performance of discrete, smaller sites within the Green Belt, primarily adjacent to existing sustainable urban areas or in locations where new settlements are being proposed as part of emerging growth options.

[1] The North Staffordshire Green Belt in Stafford Borough is not within the scope of this GBA.

[2] https://www.gov.uk/government/publications/national-planning-policy-framework--2

A GBA is not a policy or decision-making document that proposes any release of Green Belt land; this is for the LPA to determine as part of the wider plan making process. A Green Belt designation is not the only consideration when assessing the suitability and deliverability of sites. An LPA is not precluded from releasing land from the Green Belt for development if other factors in favour of the site outweigh this consideration. Such factors might include:

- Unique / significant housing or employment need and a lack of supply of more preferential sites i.e. those that the NPPF directs towards before considering Green Belt.
- Adverse implications for the sustainable development strategy within the LPA area.
- Inherent sustainability of directing growth in a particular direction.
- Tightly drawn Green Belt boundaries and constraints on alternative sites.
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents.
- Boosting housing delivery in areas with past issues of deliverability to increase the supply of affordable housing.

A GBA does not set out the case for exceptional circumstances, which will be needed if an LPA proposes release of land from the Green Belt. However, the outcomes from a GBA will form part of any exceptional circumstances case presented to support Green Belt alterations.

1.3 Report Structure

This report sets out the approach and methodology for carrying out the GBA for Staffordshire. The methodology employed draws on the implications identified from a contextual review of policy, guidance and experience elsewhere, including neighbouring authorities. At the time of writing no Local Plan had yet gone through the Examination in Public under revised national policy, so appeal case law and legal seminars have been used to give consideration to the interpretation of the new NPPF and Green Belt PPG.

The methodology report is structured as follows:

- Section 2 provides the local Green Belt context for Staffordshire, including a summary of recent relevant planning applications and appeals.
- Section 3 sets out the implications for this assessment following a review of planning policy, guidance, legal precedents and experience elsewhere for Green Belt Assessments.
- Section 4 details the specific methodology followed, including the criteria used for NPPF Green Belt purposes assessment and grey belt identification.
- Section 5 provides a summary of the assessment findings, taking a study wide view. This section is also supported with an appendix for each LPA which provides authority specific findings.
- Section 6 sets out a number of steps to be considered as a result of this assessment.

2. Local Green Belt context

2.1 Overview

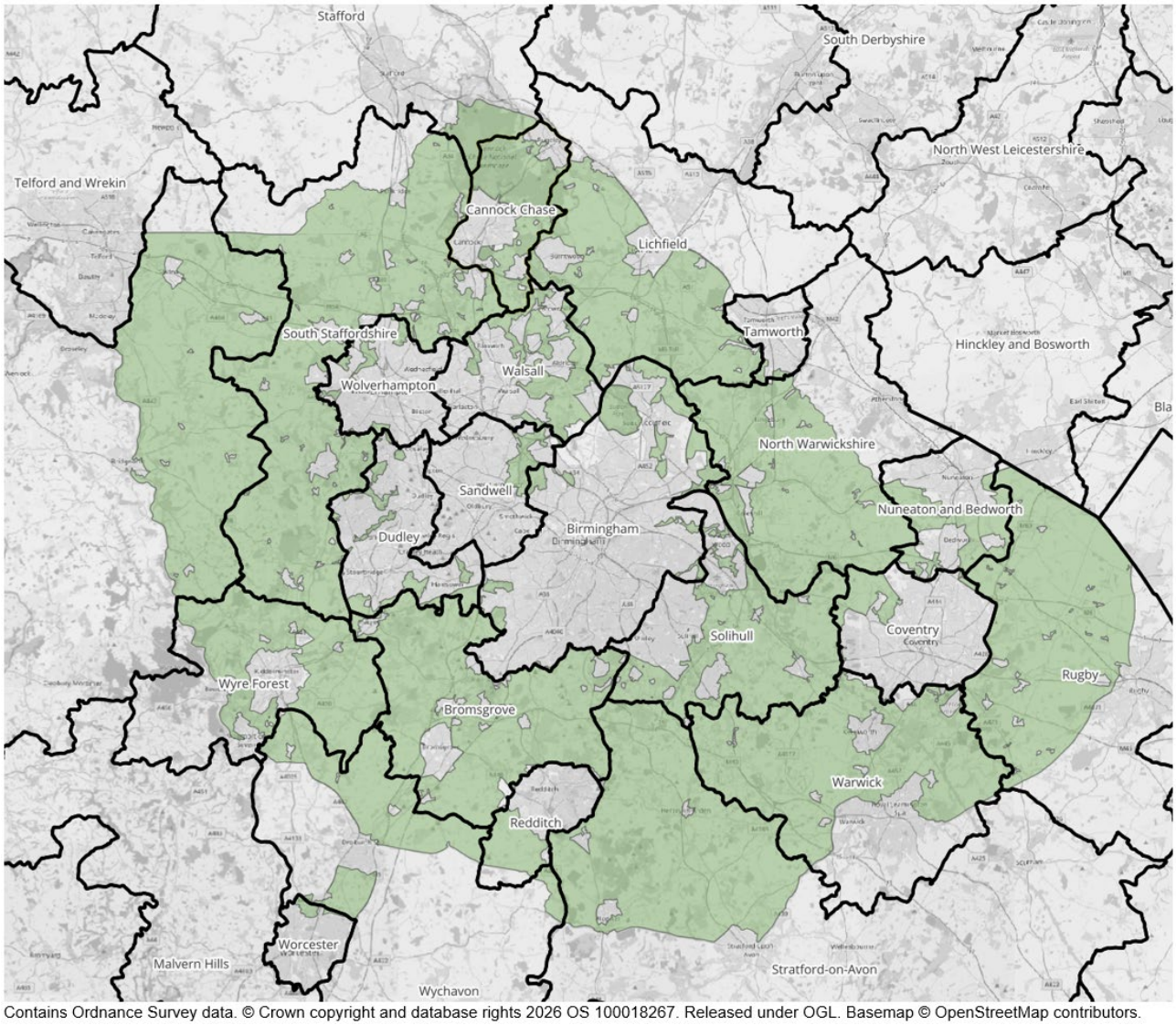
The section:

- Sets out the position of the Green Belt in the West Midlands and the study area;
- Provides a summary of the Staffordshire authorities policy context and their previous Green Belt studies where applicable.

2.2 Evolution of the Green Belt within the West Midlands and Study Area

The Green Belt in Staffordshire is part of the larger West Midlands Green Belt (as shown in Figure 1). Although local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955, it was not formally approved by the Secretary of State until 1975. The Green Belt was originally designated to prevent the expansion of the West Midlands Conurbation (built up area) into the surrounding countryside and to stop it merging with neighbouring towns.

Figure 1. Extent of West Midlands Green Belt



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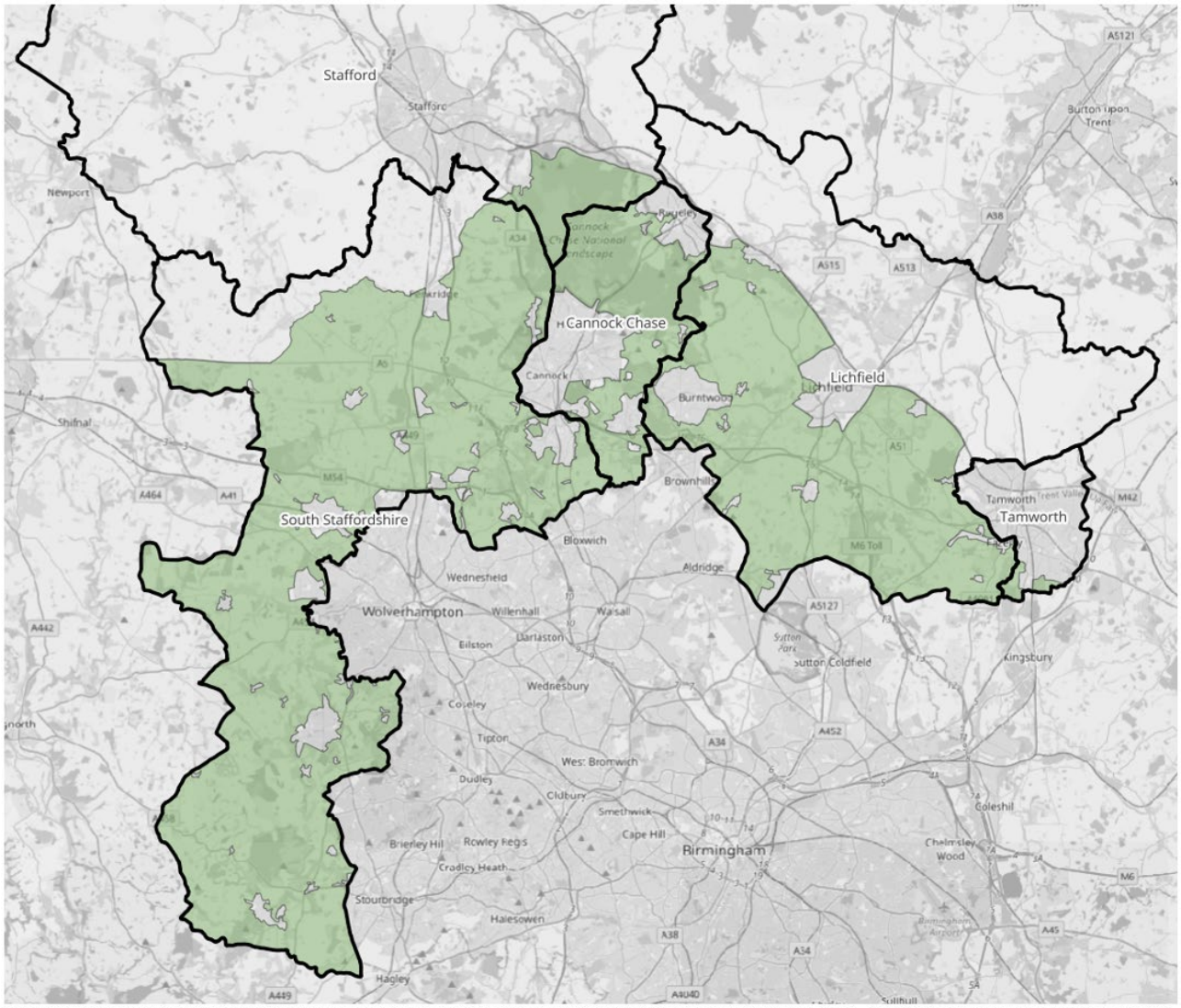
The West Midlands Green Belt covers an area of approximately 230,000 hectares, across 23 LPAs, with approximately 56,000 hectares being designated across the five authority areas in Staffordshire. This includes Lichfield City and the towns of Burntwood, Cannock, Rugeley and Tamworth, along with a number of small settlements and villages which are either inset or washed over by the Green Belt. A large proportion

of the Green Belt that sits across CCDC, SBC and in part LDC and SSC, is covered by the Cannock Chase National Landscape.

Figure 2 below shows the West Midlands Green Belt as currently designated within Staffordshire and this forms the study area for this GBA.

Figure 2. Extent of West Midlands Green Belt across the five Staffordshire authorities



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2.3 Staffordshire policy context

Each authority has an adopted Local Plan, and each are at different stages of preparing a new Local Plan. The following section provides a high-level overview of the current status of each authority.

Cannock Chase District Council

The Cannock Chase Local Plan (Part 1) was adopted in June 2014. In 2018 the Council commenced preparation of a new Local Plan, which was submitted for examination in November 2024. The submission version of this plan proposes to release 79 hectares of land from the Green Belt to provide for sufficient land to meet local housing need plus provide a 500 dwelling contribution to the unmet need of the HMA. Following various examination hearings, the Main Modifications consultation commenced in October 2025, and the plan was successfully adopted in March 2026.

Lichfield District Council

The Lichfield District Local Plan Strategy 2008-2029 was adopted in February 2015, and is supported by the Local Plan Allocations document 2008-2029, adopted July 2019 and the Local Plan 2008-2029 Policies

Maps. The Council began preparation on its next Local Plan in 2018, which was submitted for examination in June 2022. However, the Council made the decision in October 2023 to withdraw this Plan from examination.

The Council has now commenced work on the Local Plan 2022-2043, with the first public consultation on the Issues and Options document being conducted between October and December 2024. A Regulation 19 consultation is anticipated to take place in April 2026, before the Plan is submitted for examination in August/September 2026. However, at the time of writing the Local Development Scheme is under review.

Stafford Borough Council

The Plan for Stafford Borough 2011-2031 was adopted in June 2014. The Council began preparation on the Stafford Borough Local Plan 2020-2040 in 2017, with the latest public consultation being the 'Preferred Options' that took place between October to December 2022. However, in March 2025, the Council's Cabinet decided to stop the preparation of this plan.

The Council has now commenced preparation of the new Local Plan 2025 to 2045, with the plan being prepared as a new-style Development Plan as part of the Government's reforms to the plan making system.

South Staffordshire Council

The adopted South Staffordshire Local Plan is made up of two documents; the Core Strategy, adopted in 2012 and the Site Allocations Document (SAD), adopted in 2018. Following the adoption of the SAD, work commenced in 2018 on the preparation of the Local Plan Review. This plan was submitted for examination in December 2024, with the examination ongoing, and proposes to release some limited Green Belt land for residential allocations.

Tamworth Borough Council

The Tamworth Local Plan 2006-2031 was adopted in February 2016. The Council began preparation of the Local Plan 2022-2043 in 2020. An Issues and Options consultation took place in late 2022, with a Regulation 19 consultation anticipated in February/March 2026. The Plan is due to be submitted for examination in December 2026.

2.4 Previous Green Belt Evidence

The following section provides a review of the previous Green Belt Assessment/Reviews that have been conducted for each authority focussed on the most recent ones. Note, Stafford Borough Council has not previously reviewed their area of Green Belt within the West Midlands Green Belt.

2.4.1 Cannock Chase District Council

A Stage 1 Green Belt Study was undertaken in 2016[3] by LUC to understand how the land in the Cannock Chase Green Belt performed against the Green Belt purposes. This study was followed by the Green Belt Harm Assessment in 2021[4] by LUC, which assessed the potential harm of releasing land for development from the Green Belt.

The overall aim of the Green Belt Study was to assess the performance of Green Belt land within Cannock Chase against the Green Belt purposes and key characteristics attached to the Green Belt. It was designed to provide a robust and transparent evidence base to inform the Local Plan, particularly regarding potential Green Belt boundary changes. The approach involved dividing the district into broad areas and smaller parcels using physical and landscape features, then evaluating each against the NPPF's Green Belt purposes.

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[3] See: https://cannockchasedc.gov.uk/sites/default/files/site-old/ccdc_green_belt_study_final_1-_main_report-intro_and_context_0.pdf

https://cannockchasedc.gov.uk/sites/default/files/site-old/ccdc_green_belt_study_final_2a_-_main_report-methodology_0.pdf

https://cannockchasedc.gov.uk/sites/default/files/site-old/ccdc_green_belt_study_final_3_-_main_report-findings_and_conclusions_part_1.pdf

https://cannockchasedc.gov.uk/sites/default/files/site-old/ccdc_green_belt_study_final_4_-_main_report-findings_and_conclusions_part_2.pdf

[4] https://cannockchasedc.gov.uk/sites/default/files/site-old/cannock_green_belt_study_report_march_2021.pdf

The overall aim of the Green Belt Harm Assessment was to undertake an independent, robust and transparent assessment of the potential harm of releasing Green Belt land within the district in line with national policy and guidance. The study was utilised alongside wider planning evidence to inform decisions about how to accommodate the Councils' development needs across the district.

Defining assessment areas

Within the 2016 study, the assessment area was divided into two distinct assessment types with 65 smaller parcels, and five broad areas.

Smaller parcels were identified adjacent to large built up areas and settlements (towns and villages) of the district, strategic employment sites and gypsy and traveller sites. This was because these locations were considered to offer the most sustainable locations for new development. Following the definition of smaller parcels of land, the remaining areas were divided into broad areas to represent the main 'body' of the Green Belt.

These divisions were based on physical and landscape features that allowed for consistent assessment. The broad areas represented larger, open countryside zones between built-up areas, while the smaller parcels were more detailed units for analysis. Parcel boundaries were drawn to reflect logical divisions in land use and geography, though the study acknowledged that performance could vary within parcels and that further detailed analysis would be needed if land release was considered.

Within the harm assessment, the focus was placed on assessing the harm to the Green Belt purposes of expanding existing settlements, therefore all land adjacent to urban areas and rural settlement boundaries was assessed. The extent of the assessment area was not predefined, instead a process was applied to continue to assess land parcels until there was a strong distinction from the settlement edge. Therefore, the boundaries of the parcels used in the 2016 Study may not have been the same as what was assessed through the harm assessment. Land that was constrained by designations or features that would make development unsuitable was excluded, including international or national environmental designations or areas situated within Flood Zone 3.

Green Belt purposes, definitions and assessment criteria

For the Stage 1 study, each parcel and broad area were subject to an assessment against the NPPF Green Belt Purposes A-D (referred to as Purposes 1-4 in this study), all of which have equal weight. Parcels were rated from 1-4 based on their compliance with the purpose. For the study, it was considered all parcels/broad areas would score 4 for Purpose E (referred to as Purpose 5 in this study).

For the Stage 2 assessment, a six-step methodology to assess the potential harm of releasing land from the Green Belt was followed. The steps used were as follows:

- Step 1 – Identify variations in relevance of Green Belt purposes (i.e. the extent to which each Green Belt Purposes was relevant to a location)
- Step 2 – Identify variations in openness
- Step 3 – Identify variations in distinction between the inset settlement and Green Belt
- Step 4 – Assess the contribution to the Green Belt purposes
- Step 5 – Assess the impact on adjacent Green Belt land
- Step 6 – Define variations in harm around inset settlement edges, and potential to mitigate

A seven-point scale was used to assess the overall potential level of harm, ranging from very low harm to very high harm.

Assessment findings

The five 'broad areas' of the Green Belt represent largely open and undeveloped countryside therefore are considered to make considerable contribution to Green Belt purposes, with some making a more significant contribution than others. The 2016 study found that broad Areas 1 and 2 were particularly important for

preventing towns merging and protecting sensitive landscapes, with Area 2 also preserving the historic setting of Rugeley. Areas 3, 4, and 5 contributed significantly to maintaining separation between settlements and included nationally designated sites like National Landscapes (previously knowns as Areas of Outstanding Natural Beauty) and Sites of Special Scientific Interest (SSSI).

The majority of the parcels within the study area are 'mid-performing', meaning that they scored moderately well across all the Green Belt purposes or have a mixture of high and low scores across the five purposes.

The 2021 assessment found that most parcels made a strong contribution to at least one Green Belt purpose, particularly safeguarding the countryside (Purpose C) and preventing urban sprawl (Purpose A). Harm ratings varied significantly, with many parcels assessed as causing high or very high harm if released, especially where they contributed strongly to multiple purposes or where release would weaken adjacent Green Belt land. A smaller number of parcels were identified as causing moderate or low harm, typically where openness was already compromised or where strong new boundaries could be established.

While the assessment could support decisions about land release, it emphasized that performance alone does not justify changes, with exceptional circumstances and wider planning evidence also required.

Following these assessments, CCDC have sought to release 79 hectares of land from the Green Belt to support the Cannock Chase District Local Plan, as set out in the Green Belt Topic Paper[5].

2.4.2 Lichfield District Council

LDC has undertaken several Green Belt assessments[6], with the most recent assessments including a Green Belt Review 2019, Stage 2 Green Belt Review 2021 and Green Belt Village Study 2021. Other previous assessments undertaken by LDC include the Strategic Green Belt Review 2012, Green Belt Review Supplementary Report 2013 and the Local Plan Allocations Supplementary Green Belt Report 2016.

The Green Belt Review 2019[7] by the Council, provided a strategic and comprehensive review of the Green Belt within the district to inform the review of the Local Plan. LDC identified the need to advance their Local Plan review to consider the unmet housing needs set out within the Greater Birmingham and Black Country Housing Market Area (the 'HMA') which indicated that Birmingham was currently unable to meet its housing needs within their administrative boundary. This review focused on the broad areas and parcels, and assessed the extent to which they meet the purposes of the Green Belt as set out within the NPPF. LDC appointed Arup to act as a 'critical friend' from Stage 5a of the methodology to ensure the review was robust and comprehensive.

The Stage 2 Green Belt Review 2021[8] was prepared by Arup as part of the evidence base for the preparation of a new Local Plan. This review was prepared to assist the LDC in a site selection exercise to identify the most appropriate Green Belt sites to take forward in the Local Plan. This study focused on the Strategic Housing Land Availability Assessment (SHLAA) and Economic Land Availability Assessment (ELAA) sites rather than the broad area and parcel boundaries used in the 2019 Review.

The Green Belt Village Study 2021[9] by Arup, formed part of the Stage 2 Green Belt Review. The purpose of the study was to assess the extent to which the washed over villages of Chorley, Shenstone Wood End and Hints met the NPPF requirements (paragraph 140 at the time). The study provided a review of these villages, considering whether the villages were open in character and whether they made a contribution to the openness of the Green Belt.

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[5] https://cannockchasedc.gov.uk/sites/default/files/document-library/Green%20Belt%20Topic%20Paper%202023.pdf

[6] Each assessment is available here: https://www.lichfielddc.gov.uk/downloads/download/142/green-belt-review

[7] https://www.lichfielddc.gov.uk/downloads/file/1397/green-belt-review-2019

[8] See: https://www.lichfielddc.gov.uk/downloads/file/1872/stage-2-green-belt-review-2021-part-1-of-3-

https://www.lichfielddc.gov.uk/downloads/file/1873/stage-2-green-belt-review-2021-part-2-of-3-

https://www.lichfielddc.gov.uk/downloads/file/1874/stage-2-green-belt-review-2021-part-3-of-3-

[9] https://www.lichfielddc.gov.uk/downloads/file/1871/green-belt-village-study-2021

Defining assessment areas

The 2019 review assessed 112 parcels and 10 broad areas, whilst the 2021 review assessed 133 SHLAA and ELAA sites, excluding those sites which had the same or very similar boundaries to a parcel already assessed in the 2019 Review.

Through the 2019 review, due to the extent of the Green Belt within the LDC administrative boundaries, land was divided broadly into two categories to undertake the review. These were 'smaller parcels' and 'broad areas'. 'Smaller Parcels' generally consisted of smaller areas of land adjacent to existing settlements and village settlement boundaries, including settlements in neighbouring authorities that abut the Lichfield Green Belt. The 'broad areas' were defined from the remaining areas of Green Belt following the identification of the 'smaller areas'.

Approach used in Green Belt Review 2019

The review assessed the land parcels in a series of consecutive stages as follows:

- Stage 1: Context & background to review
- Stage 2: Defining the study area;
- Stage 3: Identification of land parcels/areas;
- Stage 4: Designing the assessment approach;
- Stage 5a: Method statement consultation;
- Stage 5b: Method statement consultation (wider stakeholder consultation)
- Stage 6: Undertake detailed site assessments; and
- Stage 7: Final Report.

Approach used in Stage 2 Green Belt Review 2021

The methodology comprised 3 stages as follows:

Stage 1: Initial Site Sift

Stage 1 included an initial sift against any showstopper constraints, such as international or national environmental designations where more than 50% of the site is located within the designation, and sites located within Flood Zone 3 where more than 50% is located within this zone. Housing sites detached from a settlement and not in close proximity were excluded as these sites were not considered to represent sustainable locations for development. For employment sites, those which were detached from an inset settlement, and were not clustered together or within an existing employment area were excluded.

Stage 2: Green Belt Purpose Assessment

Stage 2 assessed the sites existing role to Green Belt purposes, using the same methodology in the 2019 review. A review of national policy and guidance found that there had been no significant changes which would impact the methodology undertaken in 2019.

Stage 3: Impact on the Green Belt of Site Release

Stage 3 assessed the potential harm to the Green Belt if the site were to be released. As there is no standard approach, a qualitative assessment was developed to undertake the assessment (as set out below).

Green Belt purposes definition and assessment criteria

For both the 2019 and 2021 reviews, the contribution of the parcels to the NPPF Green Belt purposes was assessed by four categories:

- Important role – contributes to the Green Belt purpose in a strong and undeniable way

- Moderate role – contributes to the majority of the Green Belt purpose but does not fulfil all of the role
- Minor role – contributes in a limited way to the Green Belt purpose
- No role – makes no contribution to the Green Belt purpose.

In assessing potential harm to the Green Belt, the 2021 review took a qualitative approach and the conclusion summarised whether the parcel would make a substantial harm, limited harm, or no harm to the Green Belt function and its purposes.

Assessment findings

The 2019 review found that the majority of the Green Belt within the LDC administrative boundary continued to serve its purpose well, with the majority of parcels providing an 'important' or 'moderate contribution to the purposes of the Green Belt. 11 out of the 112 areas and parcels assessed were identified as providing a 'minor' contribution towards the purposes of the Green Belt.

The 2021 review identified the most appropriate sites for LDC to carry forward for consideration for release in the Local Plan.

Green Belt Village Study 2021 – approach and findings

The village study follows a three stage approach, as follows:

- Stage 1 – identify the village boundary for the purposes of the assessment
- Stage 2 - assess against paragraph 140 of the NPPF:
    - Stage 2A: Does the village have an open character?
    - Stage 2B: Does this make an important contribution to the openness of the Green Belt?
    - Make a recommendation as to whether the village should be inset or remain washed over
- Stage 3 – if a washed over village is recommended for insetting, consider how the new inset boundaries should be defined.

Following a site visit to each of the villages, all three villages were recommended to remain washed over by the Green Belt. Therefore, Stage 3 of the methodology was not undertaken, and had no impact on the wider Green Belt Review.

2.4.3 South Staffordshire Council

The South Staffordshire Green Belt Study[10], comprised both Stage 1 and Stage 2 assessments, and was undertaken in 2019 by LUC. The study provided an independent, robust and transparent assessment of the Green Belt within South Staffordshire. Stage 1 considered variations in the contribution made by the land to the NPPF purposes of the Green Belt, whereas Stage 2 assessed the potential harm of removing land from the Green Belt. An addendum[11] prepared by LUC in 2022 for two additional sites only considered the harm rating.

Defining assessment areas

Within Stage 1, 82 parcels were defined through a strategic process that aimed to capture variations in how different areas contribute to the five purposes of Green Belt.

Following an initial visit to the area, the first step in defining these assessment areas was to identify any Green Belt locations where sufficient urbanising development has occurred which impacted on the 'openness' of the Green Belt. The second step assessed the fragility of gaps between settlements identified as

[10] https://www.sstaffs.gov.uk/sites/default/files/2024-02/council-south_staffordshire_green_belt_study_2019_-_new_acre_stables.pdf

[11] https://www.sstaffs.gov.uk/sites/default/files/2023-03/green_belt_study_addendum_2022.pdf

‘towns’ under Purpose B. The assessment then reviewed areas on a settlement-by-settlement basis which assessed the relationships between the Green Belt and the urban area/settlement. The final step was to review each settlement until it was determined that land ceased to play a significant role in preventing urban sprawl, settlement separation, or makes no contribution to the setting of a historic town.

Within Stage 2, assessment areas were split into sub-parcels. This included:

- Land adjacent to inset settlements within South Staffordshire, land adjacent to settlements abutting the outer edge of the Green Belt in neighbouring authorities, or land adjacent to inset development in the Black Country authorities.
- Sites promoted through the Strategic Housing and Economic Land Availability Assessment (SHELAA).
- Areas not constrained by absolute environmental constraints (e.g. international/national environmental designations, Flood Zone 3 areas)

Sub-parcels were shaped to exclude constrained land where possible and were assessed individually or grouped based on proximity and shared characteristics.

Green Belt purposes, definitions and assessment criteria

The primary purpose of the Stage 1 assessment was to establish the contributions that each parcel made to each of the five Green Belt purposes. The Stage 1 assessment took a qualitative approach to this assessment which were captured as:

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

The Stage 1 assessment criteria considered Green Belt purposes A-D (referred to as Purposes 1-4 in the report). Purpose E (referred to as Purpose 5 in the report) was not assessed on an individual parcel basis as it was not considered possible to differentiate the contributions of different Green Belt parcels to this purpose.

The primary aim of the Stage 2 assessment was to identify the potential harm of releasing land from the Green Belt and built on the findings in Stage 1. Stage 2 provided a site-specific analysis to inform decisions about development suitability, and the assessment analysed each sub-parcel through four steps:

- Step 1: Considered contribution ratings in more depth, following on from the Stage 1 assessment
- 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 (using a seven-point scale from Very Low to Very High harm).
- Step 4: Considered harm resulting from alternative Green Belt release ‘scenarios’, such as identifying smaller areas within sub-parcels that could be released with less harm.

Assessment findings

The Stage 1 assessment found that most parcels made a strong or moderate contribution to Green Belt Purposes A and C, particularly those located in areas adjacent to major urban centres including Wolverhampton. Areas that helped maintain separation between towns, such as the narrow gaps between the West Midlands Conurbation and the built up area of Cannock/Hednesford/Cheslyn Hay/Great Wyrley, also scored highly for preventing towns from merging. The assessment identified that the vast majority of Green Belt in South Staffordshire makes a strong contribution to preventing encroachment on the countryside. It was determined that no Green Belt land in South Staffordshire made contributions to the setting or special character of a historic town.

The Stage 2 assessment found that the majority of sites assessed would have a moderate to high harm if released, however the harm ratings varied significantly across sub-parcels with some areas offering potential for lower-impact release, especially where strong boundaries could not be established or openness was already compromised. The study emphasised that a rating of 'low-harm' should not justify its release and other exceptional factors should be present.

Following these assessments, SSC produced a Green Belt Exceptional Circumstances Topic Paper[12] in 2024 which formed part of the evidence base for their new Local Plan. The paper set out the exceptional circumstances for proposed amendments to Green Belt boundaries to deliver six residential allocations.

2.4.4 Tamworth

TBC commissioned LUC in 2022[13] to undertake an assessment of the 'harm' of releasing land from the Green Belt. The study assessed all of the Green Belt land within the borough and identified land which would cause greater or lower harm to the Green Belt purposes. The study was carried out to support the preparation of Tamworth's Local Plan to consider the potential for urban extensions.

Defining assessment areas

Parcels for which the harm was assessed were not predefined, and they were instead defined to reflect variations in harm to Green Belt purposes. A systematic approach was used following a series of steps to identify variation in the different elements that are relevant to an assessment of harm. Following this approach, 13 parcels were defined and assessed.

Assessment approach

The assessment provided an analysis of likely harm to the Green Belt purposes that would result if the land was released. The assessment also considered how the release of a particular piece of land would affect the strength and function of the remaining adjacent Green Belt.

Four factors were considered in the assessment of Green Belt harm, with the Green Belt purposes (referred to as Purposes 1-5 in this study) considered throughout all of them. The factors were:

- Green Belt Function – considered the function of the parcel against each of the five Green Belt purposes.
- Green Belt Openness – considered whether the parcel contained any development which is inappropriate in the Green Belt to affect the perceived openness.
- Green Belt Distinction – considered degree of distinction from the urban area, focussing on the strength of boundaries.
- Impact on adjacent Green Belt – considered the impact on distinction and the impact on function of the adjacent Green Belt (focussing on Purposes A-C).

Each of the above four factors focussed on components of the Green Belt purposes, particularly on Purposes A-C, along with considering the essential characteristics of openness and permanence. The outcome of this was then brought together to give a rating for harm to each of Green Belt purposes A-C that would result from the land's release.

A scale of five harm ratings, ranging from low/no to high was used, with an overall harm rating being given for each parcel identified. This rating reflected the highest harm rating for any individual purpose.

Assessment findings

Tamworth's Green Belt was found to be fundamentally open and to perform a similar Green Belt function in relation to Purposes B, D and E. Variations of harm were therefore only reflected to a significant degree by variations to Purpose A and C, which related to the relationship with the existing urban area of Tamworth

[12] https://www.sstaffs.gov.uk/sites/default/files/2024-04/green_belt_except_circs_topic_paper_2024.pdf

[13] LUC, (2022), Green Belt Study Tamworth Local Plan

and the impact of release on adjacent Green Belt land. However, all parcels were deemed to play a role in Purpose A and Purpose C.

Of the 13 parcels that were assessed:

- 2 had a high overall harm
- 4 had a moderate-high harm
- 6 had a moderate harm
- 1 had a low-moderate harm

3. National policy, guidance, appeals and experience elsewhere

3.1 Overview

The section provides:

- A summary of the relevant national Green Belt policy (NPPF) and guidance (PPG);
- An analysis of how Inspectors have been interpreting the new policy and guidance in recent planning appeal decisions (up to date as of March 2026);
- Highlights experience in other authorities and insights from Independent Examinations on the topic; and
- The implications of this for the Staffordshire GBA.

3.2 National Planning Policy Framework (2024)

The recent changes to the NPPF have had some significant implications for national policy approaches to Green Belts. However, it is important to note that the majority of the broad principles around Green Belt that have been well-established since the first NPPF was published in 2012 remain unchanged. These include:

- The fundamental aim of Green Belt policy to "*prevent urban sprawl by keeping land permanently open"* (NPPF, paragraph 142).
- The five main purposes of Green Belt (NPPF, paragraph 143):
    a) to check the unrestricted sprawl of large built up areas;
    b) to prevent neighbouring towns merging into one another;
    c) to assist in safeguarding the countryside from encroachment;
    d) to preserve the setting and special character of historic towns; and
    e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- The intention for Green Belts to have permanence so they can endure beyond the plan period (NPPF 2024, paragraphs 144 and 145).
- The need for alterations to Green Belt to only be made where there are exceptional circumstances to justify this (NPPF, paragraph 145)
- The need to take into account sustainable patterns of development when considering the release of land from the Green Belt (NPPF, paragraph 148)
- Considerations as to whether villages should be included or excluded from the Green Belt (NPPF 2024, paragraph 150).
- The need for LPAs to plan positively to enhance beneficial uses within the Green Belt (NPPF 2024, paragraph 151).

The 2024 version of the NPPF included a number of significant changes for plan making relating to exceptional circumstances, grey belt, and sequential release of Green Belt land and compensatory improvements. These are summarised below.

3.2.1 Exceptional circumstances

The NPPF now requires local authorities to review their Green Belt boundaries where they cannot meet their identified need for homes, commercial or other development through other means: "*If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and*

propose alternations to meet these needs in full." The review of Green Belt boundaries for this reason now constitutes the grounds for exceptional circumstances to release Green Belt land (NPPF 2024, paragraph 146).

The new requirement to consider Green Belt land to meet housing and other requirements is qualified at a high-level by an additional test introduced in paragraph 146, which local authorities will have to demonstrate in their exceptional circumstances case. The test stipulates that Green Belt boundaries should not be altered where that would "*fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan"* (NPPF, paragraph 146).

3.2.2 Grey belt

The NPPF introduces a sub-category of Green Belt land called grey belt, which is defined as:

"…land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes A, B, or D in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development" (NPPF, glossary).

Footnote 7 identifies a number of constraints which may preclude land from being considered as grey belt. The PPG provides further guidance on how footnote 7 should be applied when identifying land as grey belt, including that authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7 (summarised below).

3.2.3 Sequential release of Green Belt land

Paragraph 148 of the NPPF introduces a sequential approach to the release of Green Belt land: *"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations."* As in previous NPPFs, when applying this approach and the release of Green Belt is proposed, consideration still needs to be given to promoting sustainable patterns of development, in particular whether "*the site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework*" (NPPF 2024, paragraph 148). Paragraphs 110 and 115 provides details on sustainable development locations and sustainable transport solutions.

3.2.4 Compensatory improvements

The NPPF previously included a requirement for Local Plans to set out ways in which the impact of removing land from the Green Belt will be offset through compensatory improvements to environmental quality and accessibility. The PPG had expanded upon this with guidance on measures that could be considered in order to provide those compensatory improvements, such as new or enhanced green infrastructure, woodland planning, landscape and visual enhancements, improvements to biodiversity, new or enhanced walking and cycling routes, and new or enhanced recreation and playing field provision. These explicit requirements for compensatory improvements when releasing land from the Green Belt no longer exist. New requirements for necessary improvements to local infrastructure and provision of accessible green spaces are required for land released from the Green Belt (NPPF, paragraph 156).

3.2.5 Draft National Planning Policy Framework (December 2025)

In December 2025, the Government commenced a consultation on proposed reforms and other changes to the planning system. The consultation closed on 10 March 2026.

The consultation included a new draft version of the NPPF. There are minor changes to the Green Belt sections of the NPPF, however, the aims and purposes of the Green Belt have stayed the same. One of the key changes is in relation to the definition of grey belt in Annex B, which no longer refers to footnote 7 and states: *"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2."*

Under transitional arrangements, any Local Plan that is submitted by December 2026 will be assessed based on the December 2024 NPPF, and therefore the draft NPPF has had no implications on how GBAs are currently being conducted.

However, for any Local Plan's submitted post-December 2026, the revised NPPF is likely to become the version the plan is examined against. Assuming, the draft NPPF is adopted as proposed, the consideration of footnote 7 constraints will no longer be factored into as part of the grey belt determination.

3.3 Planning Practice Guidance (2025)

In February 2025 the Government updated the Green Belt section of the PPG[14] to provide additional guidance and reflect the changes made to the NPPF in December 2024. As well as the approach to assessing grey belt, the PPG now includes a level of specific guidance on how to carry out wider aspects of a review of Green Belt that has not previously existed. The PPG sets out:

- How to assess Green Belt to identify grey belt within it, in particular how to assess land against the NPPF Green Belt Purposes A, B and D;
- How to consider the impact of development, or of the release of land on the remaining Green Belt in the plan area;
- When a proposal on grey belt land might constitute inappropriate development in the Green Belt; and
- How to identify sustainable locations for development when considering release of Green Belt land.

The PPG also provides guidance on how to consider proposals on potential grey belt land for the purpose of development management decision-making. However, this summary focuses on the implications for plan-making only.

3.3.1 Grey belt

The guidance makes it clear that the identification of land as grey belt does not necessarily mean that it should be allocated for development or released from the Green Belt. The contribution of the land to Green Belt purposes needs to be considered alongside wider NPPF policies in making any site selection decisions.

The guidance sets out that GBA, and the identification of grey belt within these, should be part of the plan making process – with the expectation that the identification of grey belt land will allow sites within the grey belt to be prioritised when making site selection decisions as detailed in paragraphs 147 and 148 of the NPPF.

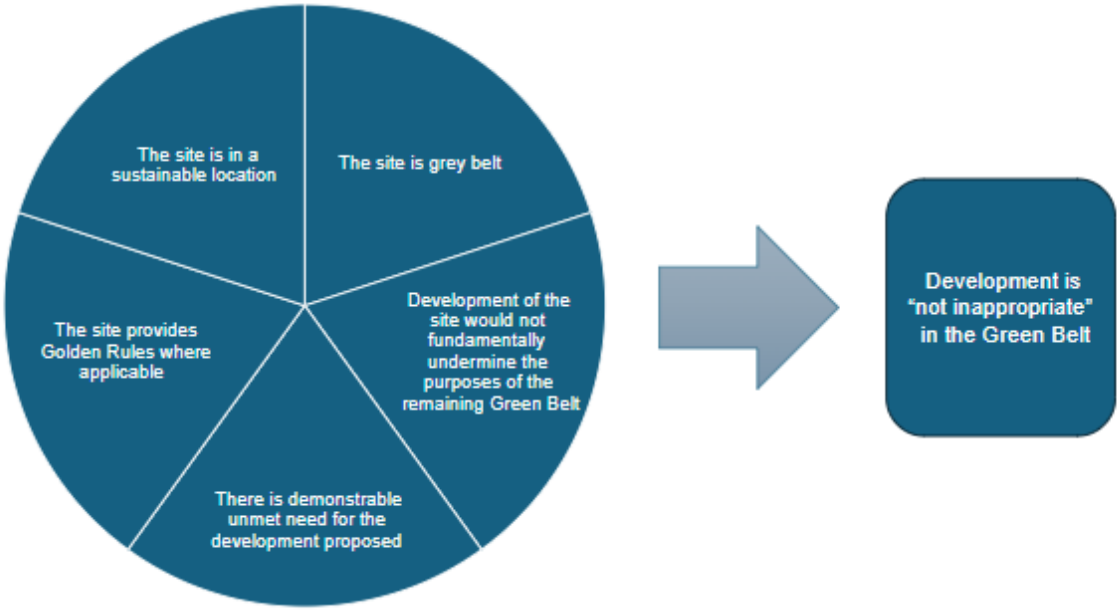
As set out above, land in the Green Belt can be considered to be grey belt where it does not make a strong contribution to any of Purposes A, B or D. The grey belt definition also excludes land where the constraints identified in footnote 7 of the NPPF would provide a 'strong reason' for refusing or restricting development. Designations listed within footnote 7 include habitat sites, Sites of Special Scientific Interest (SSSI); Local Green Space, National Landscapes, National Parks or Heritage Coasts; irreplaceable habitats; designated heritage assets; and areas that are at risk of flooding or coastal change.

The PPG makes it clear that authorities need to consider not only areas where grey belt would be covered by these designations, but also whether development would affect these designations. Where such constraints are present, it is likely to only be possible to provisionally identify such land as grey belt in advance of more detailed specified proposals and impact assessments (e.g. those forming part of the wider site selection process).

Green Belt land judged not to strongly contribute to any of Purposes A, B or D, and subject to footnote 7 exclusions, can be provisionally identified as grey belt. However, there are then further 'tests' that need to be passed before this land can be identified as a location where development is not inappropriate, as summarised in Figure 3 below.

[14] https://www.gov.uk/guidance/green-belt

Figure 3. Diagram of when development in the Green Belt is not inappropriate under paragraph 155 of the NPPF



The PPG provides guidance on the application of the new NPPF test of: "*whether the release of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole."* (NPPF, paragraph 146). The PPG explains that *"In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way."*

In terms of sustainable locations, the PPG highlights that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a location is appropriate for development. Where grey belt land is not in a location that is or can be made sustainable, then development of that land is inappropriate. The PPG elaborates that the definition of sustainable locations should be determined in the local context, taking into account opportunities to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.

3.3.2 Spatial scope of Green Belt Assessments

Updates to the PPG have also provided specific advice on the way in which Green Belt should be divided into assessment areas (including for the purpose of identifying grey belt). It indicates that the number and size of assessment areas should respond to local circumstances. The whole Green Belt should be considered in the first instance with sufficiently granularity to enable assessment of the variable contribution of the Green Belt to each of the purposes. The PPG advises that a small number of large assessment areas will not be appropriate in most circumstances, and that to better identify grey belt, assessment areas should be sub-divided. Finer-grained assessment may be appropriate in specific locations, such as around existing settlements or public transport hubs or corridors.

3.3.3 Definition of large built up areas and towns

A number of different interpretations of settlement definitions have historically arisen in different Green Belt Assessments when assessing the contributions to the purposes, partly in response to local circumstances. The PPG now clarifies that for Purpose A, Purpose B and Purpose D, assessments should not consider villages – Purpose A should be assessed for 'large built up areas' only, and Purposes B and D should be assessed for 'towns' only.

The PPG has not set out explicit guidance on how to define what a large built up area is, however, it is notable that the NPPF and PPG have retained the focus in Purpose A on 'large built up areas' (rather than adopting the same focus on 'towns' as Purposes B and D). The Minister of State (Housing, Communities and

Local Government) has confirmed that LPAs can use necessary judgment to form a locally appropriate definition of large built up areas[15].

The PPG has not set out a definition of towns or villages, for consideration under Purposes B and D. It has also not been defined how towns should be considered as 'historic' for Purpose D. It will therefore remain necessary for a degree of local interpretation to be applied when establishing which settlements should fall within the scope of purposes assessments.

3.3.4 Approach to purposes assessment

The PPG now provides explicit guidance on how to conduct a Green Belt Assessment to identify grey belt for the three purposes that need to be considered – Purpose A, Purpose B, and Purpose D. It also suggests a number of factors that might indicate the extent of contribution (whether strong, moderate or weak/none). The PPG is silent on Purposes C and E as these are not included within the definition of grey belt.

The PPG sets out the following factors that should be considered when assessing performance against Purpose A, to check the unrestricted sprawl of large built up areas:

- Adjacency to large built up area(s).
- Extent of existing development in assessment area and impact of other urbanising influences.
- Presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development.
- Shape of development if released, with degree of enclosure and incongruous patterns of development considered.

The PPG sets out the following factors that should be considered when assessing performance against Purpose B, to prevent neighbouring towns merging into one another:

- Location of assessment area in relation to defined towns.
- Extent of existing development in assessment area.
- Extent to which the assessment area forms part of the gap between towns.
- Degree to which the development of the assessment area would result in loss of visual separation of towns, including whether there are any physical or natural features that might preserve visual separation.

The PPG sets out the following factors that should be considered when assessing performance against Purpose D, to preserve the setting and special character of historic towns. It notes that if there are no historic towns, a detailed assessment may not be necessary:

- Extent of existing development in assessment area.
- Role that the assessment area plays in the setting of the historic town.
- Contribution that the assessment area makes to the special character of the historic town. This should consider physical, visual and experiential links between the assessment area and the historic aspects of the town.
- Degree of separation of assessment area from the historic aspects of the town by existing development or topography.

3.4 Review of recent appeal decisions

As the NPPF and Green Belt PPG have only relatively recently been published, they have yet to be tested at any Local Plan Examinations. Therefore, it is helpful to look at historic and recent planning appeals to see

[15] https://questions-statements.parliament.uk/written-questions/detail/2025-07-16/68562

how they are being interpreted on planning application decisions to identify any relevant lessons learnt that can be applied to plan-making.

Before looking at recent appeals, it is helpful to reflect on more historic appeals, which have established key points in relation to openness that are still considered relevant for GBA.

- Openness is generally considered to be 'land free from built development', which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas.[16]
- Openness should be considered not only in terms of a 'volumetric approach' (i.e. physical coverage of built form) but also in terms of 'visual elements' (for example, visual linkages between settlements in relation to purpose B, or functional character and linkages to the wider Green Belt in relation to purpose C).[17]
- While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, is not a mandatory determinative factor of openness.[18]

A more recent appeal from 2025 also confirms that openness 'cannot be compromised' by 'not inappropriate development'; in other words, an acceptable use such as a gypsy and travellers caravan site can be placed in the Green Belt without affecting openness.[19]

Following a review of around 100 planning appeals that have been determined since the publication of the NPPF / PPG and which featured Green Belt as a main issue, a number of key lessons have been identified:

- The definition of 'large built up areas' and 'towns' within purposes assessments is significant and should align with how these places are defined within the Local Plan. There can be no ambiguity as to whether places are villages or towns. The definition of settlements in a settlement hierarchy has significant weight when determining what constitutes a town for Green Belt purposes.
- Looking at parcels within a GBA is helpful at a strategic level for plan making. However, when considering the identification of grey belt in decision making, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site.
- Purpose A is concerned with the sprawl in relation to large built up areas only. The fact that a development would create ribbon development is not relevant to the assessment of Purpose A.
- In evaluating Purpose A, boundary features are themselves considered to play a role in restricting development.
- In the consideration of Purpose A, lack of clear physical boundaries can result in the conclusion that the development of a site would result in an incongruous pattern of development, and therefore strongly contributing to Purpose A.
- Purpose B is concerned with separation between towns only. Villages should not be considered for this purpose assessment.
- In evaluating Purpose B, the importance of a parcel's contribution is determined in part by its distance from nearby towns, as well as the total scale of the gap between two towns. If a parcel forms only a small part of the gap, it would be less likely to make a 'strong' contribution.

[16] The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

[17] See: Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin).

[18] Further information available here: https://www.supremecourt.uk/cases/uksc-2018-0077.html

[19] https://d2nsgnsf036lw8.cloudfront.net/PDFs-documents-and-other-resources/Judgments-and-decisions/Mole-Valley-District-Council-Final-approved-Judgment-for-Hand-Down-14.8.25-00219.pdf

- In respect of Purpose B, consideration is being given to whether neighbouring towns could be considered to already be merged by existing development.
- In defining historic towns for Purpose D assessment, consideration must be given to their character, including a determination of the impacts of modern development and/or whether settlements have maintained their identities as distinct towns.
- A historic core should be identified for each historic town, and the Green Belt should then be considered for its relationship with that particular part of town and its main historic features.
- Proximity to a historic town alone is not sufficient to establish a Purpose D contribution; character or visual quality also need to be taken into account.
- A site may be grey belt but if it is not in a sustainable location, development of it would be classed as inappropriate development in the Green Belt. 'Sustainable location' can be defined in relation to distance from facilities and services, and access to public transport options rather than reliance on private vehicles.
- The presence of a footnote 7 designation does not automatically mean that a site fails the grey belt test. There needs to be a strong reason for refusal.
- The proportional loss of Green Belt should be considered in relation to the totality of the Green Belt within a local authority. If the proportional loss is small in relation to the total area of Green Belt within the local authority's administrative boundary, it would be less likely to fundamentally undermine the Green Belt purposes, taken together.
- Whilst provisional grey belt is identified through examination of an area's Purpose A, B and D contributions, an assessment of its fundamental importance must also consider its contributions to Purposes C and E.

Appendix A.1 sets out in greater detail the most significant and salient decisions from the reviewed appeals.

3.5 Good Practice and Experience Elsewhere

There is no prescribed methodology for undertaking GBA. It is generally accepted that GBA and Green Belt Reviews should take account of good practice advice and comparator studies[20], with authorities generally taking a variety of approaches to date. The following section considers a comparative review of Green Belt studies undertaken by other LPAs whose Local Plans have been found sound at Examination and have been adopted, and provides an overview of how neighbouring authorities have approached their GBAs.

Although no GBAs have yet been tested at Local Plan Examination under the new national policy and guidance, it is still useful to understand how other LPAs have conducted GBAs to date, as key principles still apply. It is acknowledged that there are likely to be differences in approach however this still provides useful context and understanding, particularly in relation to Purpose C and E which PPG does not provide any guidance on.

3.5.1 Comparative review of existing Green Belt Assessments

The comparative review has focused on the general approach to the Green Belt studies, the approach to assessing the five Green Belt purposes, and the consideration of Green Belt harm or implications on the Green Belt.

The approaches of the following authorities have been considered. The key findings are summarised below and a detailed review of these is provided in Appendix A.2. These reviews have been selected as they have been completed relatively recently, completed by a variety of consultants or inhouse by the LPA, and the Inspector's reports provide specific comments on the GBA.

- Greater Manchester Combined Authority (Joint Plan adopted 21 March 2024)

[20] Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan https://www.runnymede.gov.uk/downloads/file/778/inspector-s-report-on-rbc-2030-lp

- Warrington Council (Local Plan adopted 4 December 2023)
- Calderdale Council (Local Plan adopted 22 March 2023)
- North Hertfordshire Council (Local Plan adopted 8 November 2022)
- Cheshire East Council (Local Plan adopted July 2017)

General approach and scope

All of the studies involved a multi-stage process, and the terminology applied to these studies varies considerably; some authorities refer to Stage 1 and Stage 2 Green Belt Reviews or Assessments whilst others incorporate elements within their Site Selection or Site Allocation process after completion of an initial Green Belt Assessment or Review.

Also, whilst the approaches vary significantly in terms of the detailed methodological elements, there are similarities which can be drawn in terms of the overall process and approach, and which can be applied in shaping the approach. All of the studies reviewed involved a process of defining/identifying parcels, areas, or sites, and assessing these against Green Belt purposes. All of the studies utilised a desktop assessment combined with site visits.

The North Hertfordshire Local Plan Inspector acknowledged there is no prescribed method for undertaking Green Belt studies, acknowledging the need for a rational and suitable approach to inform the planning judgements in the assessment. At paragraph 156 of the Inspector's Report, the Inspector states: "*There is no prescribed methodology for undertaking Green Belt assessments of this sort. As I see it, the general approach and methodologies used by the Council are appropriate for the task. All the criteria used throughout the various assessments are rational and suitable. Although laden with planning judgements on the part of the authors, that is inescapable and does not undermine the work in any way. I note that the assessments do not rely on desk top studies but have included field work and visits to the land in question. This is reassuring and bolsters the confidence one can place in the judgements reached*."

Approach to assessing the five Green Belt purposes

Rating

All of the authorities used a qualitative scoring system against each of the purposes with slightly different terminology. Greater Manchester Combined Authority and Warrington both used strong, moderate, weak, and no contribution. Calderdale used 'yes/no/partial' against each of the purposes. North Hertfordshire used significant, moderate, and limited contribution. Cheshire East used major, significant, contribution, and no contribution.

Purpose A

Most of the studies defined 'large built up area' for the purposes of the study. Greater Manchester Combined Authority, Warrington, and Calderdale provided a specific definition of the large-built up area. Greater Manchester Combined Authority defined this as the visible continuous urban mass that stretches across all of the ten local authorities. Warrington defined this as the Warrington urban area, and Calderdale defined this as the seven main towns and the smaller settlements some of which were continuous to the built up area. Whereas North Hertfordshire and Cheshire East both used all inset settlements/urban areas identified in the Local Plan.

The criteria to assess Purpose A involved consideration of a range of factors. Greater Manchester Combined Authority considered existing sprawl/open character, boundary features, nature of the settlement form (including potential for rounding off), potential for ribbon development, and potential for sprawl to occur beyond the parcel boundary. Warrington and Cheshire East considered adjacency to the large built up area, whether there were existing durable boundaries to prevent sprawl, the potential for rounding off, and the parcel's role in preventing ribbon development. Calderdale considered boundaries, ribbon development, irregular settlement patterns, connection to the built up area, and proximity to the built up area. North Hertfordshire considered the role of the land in preventing the spread of development.

Purpose B

Cheshire East Council, North Hertfordshire and Greater Manchester Combined Authority defined 'neighbouring town' as all inset settlements. Warrington specifically defined 'neighbouring town' taking into account population size. Calderdale used the same settlements that were defined as 'large built up areas' for Purpose A.

All of the studies considered the role of the land in maintaining the separation of the towns, including the physical and visual role of the parcel in preventing merging and the sensitivity and integrity of the gap if development of the parcel were to take place. None of the studies used a distance measurement to determine Purpose B. Calderdale also included additional criteria relating to existing natural or infrastructure barriers which could contain development, the presence of any existing development, and the potential for ribbon development.

Purpose C

The criteria to assess Purpose C involved consideration of a range of factors. Greater Manchester Combined Authority considered whether the parcel had the characteristics of countryside and whether it had been affected by encroachment. Cheshire East and Warrington considered existing land use and encroachment, the degree of connection to the countryside, the degree of openness, the existing boundaries between the parcel and the settlement and the parcel and the countryside, and whether it serves a beneficial use of the Green Belt. North Hertfordshire considered existing urbanising influences, whether there was a strong boundary to contain development and the openness of the parcel. Calderdale included similar factors to above but also considered other factors such as landscape, wildlife, geological, geomorphic designations, public access or recreational use, and the agricultural land grading.

Purpose D

Warrington, Cheshire East and Greater Manchester Combined Authority define 'historic town' using existing evidence including historic town surveys and historic landscape characterisation studies. In undertaking the assessment, the presence and proximity of the historic town's Conservation Area is taken into account focusing on the relationship to the Green Belt which is judged by the proximity or level of separation. Calderdale considered historic settlement to be any settlement with historic features. The Local Plan Inspector noted that the interpretation of the purpose was broader than the terminology in the NPPF given it included all historic features rather than 'historic towns'. As a result, the Inspector required the Council to undertake a sensitivity test to demonstrate the impact of omitting Purpose D on the conclusions of the assessment. The Council's sensitivity test demonstrated that omitting the purpose would only impact upon a small number of parcels. North Hertfordshire did not define historic towns but assessed the links between the Green Belt and historic parts of the town.

Cheshire East had initially not assessed Purpose D in the previous Green Belt Assessment however this was raised as a flaw in the methodology in the Inspector's Interim Views. Purpose D was therefore included in the Green Belt Assessment Update. In his Further Interim Views, the Local Plan Inspector commented on the approach to Purpose D in paragraph 45: "*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 irrelevan*t."

Purpose E

Both North Hertfordshire and Greater Manchester Combined Authority did not assess Purpose E. The Greater Manchester study noted that although Purpose E was important and should be afforded equal weight as the other purposes, it was not possible to assess it on a parcel-by-parcel basis. The Inspector commented that this was an adequate and proportionate approach. In relation to North Hertfordshire, the justification for not including Purpose E was that the other four purposes acted as a proxy for it. The Local Plan Inspector considered this was a reasonable stance to take and this was suitable and proportionate.

Both Warrington and Calderdale assessed all parcels equally for Purpose E, with Warrington applying a rating of 'moderate' and Calderdale assessing all parcels as 'yes'.

Cheshire East assessed Purpose E on a settlement basis taking into account the percentage of brownfield urban potential within the settlement. The Council's previous version of the Green Belt Assessment had not

considered Purpose E and the Inspector had raised this as a flaw in the methodology in the Inspector's Interim Views.

Overall assessment

The Greater Manchester study was the only one not to provide an overall assessment. Warrington, Cheshire East, North Hertfordshire and Calderdale all included an overall assessment. Most of these studies provided guidance in the method on how to undertake the overall assessment. Elements of professional judgement were applied. For the overall assessment, Calderdale concluded parcels were either most sensitive or mid sensitive.

The North Hertfordshire Local Plan Inspector noted that some participants had commented that the overall score should reflect the highest contribution to any of the individual purposes however the Inspector did not agree with this view. At paragraph 158, the Inspector states: "*In the absence of prescription, it seems to me logical to 'step back' and reach a rounded judgement taking into account the performance of the land in question in relation to all the Green Belt purposes overall…To offer the facility of meaningful comparison, it strikes me as most instructive to consider performance against the purposes of including land in the Green Belt overall*."

Consideration of Green Belt harm

Beyond the initial parcel or site assessments against Green Belt purposes, nearly all of the authorities produced further evidence to assess Green Belt harm from the perspective of potential site selection and release from the Green Belt. The exception to this was Calderdale Council who used the outcomes from the purpose assessment as an indicator of harm applying a sensitivity scale to this.

In the case of Cheshire East, this assessment formed part of their site selection process and considered the following: potential area of Green Belt for release, Green Belt assessment for potential area of release, resulting Green Belt boundary, assessment of surrounding Green Belt, and exceptional circumstances.

In comparison, North Hertfordshire undertook an assessment of harm to the Green Belt of the proposed allocations and submitted this as part of the statements and evidence during the Local Plan Examination.

Both the Warrington and Greater Manchester studies had a more detailed approach to the harm assessment. Both assessments focused on the proposed site allocations and considered the site's existing contribution to Green Belt purposes, the impact of releasing the site on the surrounding retained Green Belt land, any cumulative impacts, and the resultant Green Belt boundary. The Warrington study provided a conclusion as to whether removal of the site from the Green Belt would harm the overall function and integrity of the Green Belt. The Greater Manchester study took a slightly different approach identifying variations in harm (Very High, High, Moderate-High, Moderate, Low-Moderate, Low or Very Low) to the Green Belt within the allocation.

Summary of Findings

Key findings from the above sections which are relevant to this study are as follows:

- LPAs have taken a variety of approaches but there is a significant degree of commonality across studies.
- All of the comparative examples incorporated the same fundamental elements of a Green Belt purpose assessment providing a local interpretation of the five purposes based on detailed criteria. The assessments were undertaken based on a desktop analysis combined with site visits.
- Green Belt is assessed against the NPPF purposes although not all authorities assess Purpose E. The inclusion and exclusion of Purpose E has been accepted by Inspectors where a justification for this has been provided.
- A variety of qualitative scales, involving either a binary or three or four-point scoring or rating system, are used to assess the level of contribution to Green Belt purposes.
- In most cases, the comparative examples provided an overall assessment against Green Belt purposes which includes a rounded judgement taking into account all purposes.

- Beyond the initial assessments against Green Belt purposes, nearly all the comparative examples produced further evidence to assess Green Belt harm. This tended to focus on the proposed site allocations.

3.5.2 Comparative review of neighbouring authorities' existing Green Belt assessments

A review of the most recent GBA for the authorities which are adjacent to Staffordshire's boundary was undertaken, this included Birmingham City Council, Black Country Authorities, Bromsgrove District Council, North Warwickshire Borough Council, Shropshire Council and Wyre Forest District Council. This was a high-level review focusing on the general approach and scope of these assessments, and the approach to assessing the five Green Belt purposes. The key findings are summarised below and a detailed review of these is provided in Appendix A.3.

The majority of these GBA were undertaken before the NPPF and PPG updates, noting that Birmingham City Council have since published the Birmingham Green Belt Assessment in October 2025 based on the new requirements from national policy. Therefore, some of the approaches, particularly around villages assessed in Purpose B and D are now considered outdated.

General approach and scope

All the GBAs took a multistage approach, with a difference being whether they were presented within one document or multiple. They all looked at the entire Green Belt within the authority boundary (or multiple authority boundaries where a joint study was undertaken). None of the assessments looked to define parcels or broad areas which extended into a neighbouring authority area.

Approach to assessing the five Green Belt purposes

Rating

How the Green Belt purpose assessment was rated differed across the assessments, with some opting for a numerical approach, whereas others took a qualitive approach.

Purpose A

The West Midlands conurbation was considered a large built up area for all the GBAs. In addition, other large built up areas were defined where this was applicable in a localised context, for example Cannock, Cheslyn Hay, Great Wyrley and Hednesford (as one) and Telford.

Purpose B

The approach to locations considered a town varied across the assessments. Some used settlement hierarchies and the approach to the spatial strategy within adopted plans, whereas others named any town or settlement that were within their area. Of note is the approach the Black Country Green Belt Study (2019) took, where it classed towns as those that had a strategic centre or town centre within the Black Country Core Strategy (2011). These towns were treated as separate towns within the West Midlands conurbation. However, the Birmingham Green Belt Assessment (2025) considered that the West Midlands conurbation forms one 'town' for the purposes of this assessment due to the built form being a contiguous urban area.

Most of the GBAs assessed the distance between the neighbouring towns and the contribution that the parcels made to preventing towns from merging using professional judgement. This approach considered factors such as whether the assessment area is located in a gap between towns, the character and identity of each town, the function of the land between the towns, the perception of separation and whether there is existing built form connecting the towns.

Whilst the Black Country Green Belt Study (2019) states that a specific 'scale rule' approach should be avoided, the approach taken in the Wyre Forest Part 1 (2016) study was to consider the specific width between the towns, using the scale <1km, 1-2km, >2km.

Purpose C

The approach to Purpose C was generally consistent by looking at openness, rural land uses and lack of built development.

Purpose D

Across the studies there were differences to the approach of defining historic towns.

The Black Country Green Belt Study (2019) did not assess any historic towns as it was concluded that there were no cities or towns that had a special historic character to which its landscape and setting make a significant contribution to warrant assessment. Additionally, any towns that could be potentially considered as historic were not considered to be close enough to the Green Belt for nearby parcels to make more than a weak contribution to its setting or special character in Green Belt terms. A similar approach was adopted in the Birmingham Green Belt Assessment (2025).

In the Bromsgrove Green Belt Purposes Assessment: Part 1 (2019), it was considered the core of Bromsgrove Town could be considered a historic town. However, due to the considerable amount of development between the historic core of the Conservation Area and the Green Belt, it was not considered relevant to include in the assessment for this purpose. Similarly, in Birmingham's Green Belt Assessment (2013), no historic towns were identified as it was considered that the function and nature of the Green Belt in Birmingham did not directly relate to the preservation of historic towns as all areas identified adjoined the urban area.

In contrast, the Coventry and Warwickshire Joint Green Belt Stage 2 (2016), Shropshire's Green Belt Assessment (2017), and Wyre Forest's Green Belt Study Part 1 (2016) and Part 2 (2018), listed a number of historic towns. They were typically identified by Conservation Areas, and in some instances clusters of Listed Buildings, and the extent to which the Green Belt contributes to the setting and historic character of these areas.

Purpose E

Most assessments concluded that Purpose E could not be assessed at an individual parcel level, with all parcels then receiving the same rating or no assessment being done against this purpose.

However, in the Wyre Forest Part 1 assessment, the approach to Purpose E was to rate the role that the parcel makes in combination with adjacent parcels to encouraging urban regeneration. Parcels were rated as making a 'significant contribution', a 'contribution', or 'limited contribution'. Most parcels made a 'limited contribution', other than some areas of land around Kidderminster and Stourport making a 'contribution' as they comprised previously developed land.

Summary of Findings

As with the GBAs that were reviewed under 3.5.1, the findings are similar in that there are differences but also commonality across each of the neighbouring authorities GBAs. Where appropriate and suitable, this GBA for Staffordshire will look to align with the approaches in the neighbouring authorities' GBAs.

3.5.3 Review of outcomes from Local Plan Examinations

Inspector's letters and reports from a range of Local Plan Examinations across the country have been reviewed insofar as they relate to Green Belt methodologies. Although they pre-date the publication of the latest national policy and guidance, they nevertheless provide some useful pointers for carrying out GBA.

Key points of note are:

- A staged approach to GBA is appropriate and has been commended at Examination.[21]
- Any methodology should clearly set out how the purposes have been interpreted and should respect the local context in relation to the definition of key terms[22] and only using those purposes deemed relevant to the local context.

[21] Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

[22] David Smith, Inspector, (24 January 2018), Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030

- Openness and permanence are key considerations in terms of Green Belt; and are therefore integral to the assessment of Green Belt across all purposes.[23]
- A thorough approach must be taken to the identification of assessment areas for Stage 2 GBA, particularly where there is a risk that local housing need would not be met without amending Green Belt boundaries.[24]
- Detailed GBA (i.e. Stage 2) does not need to be carried out for land covered by major policy constraints, for example flood zone 3b or sites of international or national nature conservation importance, which would preclude development in any case.[25]
- Local purposes of the Green Belt should not necessarily be given the same consideration as the NPPF defined purposes. This is a question for professional judgement.[26]

3.6 Implications for this study

National policy consistency:

- Green Belt policy has remained consistent in relation to the fundamental aim, purposes, permanence, requirement to demonstrate exceptional circumstances before making changes, sustainable patterns of development, washed over village definition and positive planning within the Green Belt. Therefore, previous approaches to GBAs are likely to be broadly still applicable, however, the development of the methodology should be cognisant of the detailed points of difference in national policy in relation to grey belt, exceptional circumstances and sequential release of Green Belt land, insofar as they are relevant to the scope of a GBA.
- Through the draft NPPF (Dec 2025) the aims and purposes of the Green Belt have stayed the same, and therefore previously established approaches to GBAs are still appropriate to follow.

Stages and geographic scope:

- As well as a review of the performance of the whole of the Green Belt within the LPA area; there needs to be subsequent assessment at a sufficiently granular scale to enable the assessment of variable contribution to the Green Belt purposes, to inform the identification of grey belt. This is consistent with the Green Belt PPG.
- Authorities have typically undertaken a staged approach to Green Belt assessment, which historically has been commended at examination. Stage 1 GBA focus on the entirety of the Green Belt within an authority, dividing the Green Belt into strategic parcels for assessment. A Stage 2 GBA is more spatially focussed. This approach is considered to align with the new PPG. Thus, a two-stage process which firstly considers the performance of the entire extent of the Green Belt and which secondly consider more granular, site-level areas of Green Belt land should be undertaken.

[23] NPPF (2021)) paragraph 137; and Mel Middleton, Inspector (December 2017) Note – Green Belt Assessment, Independent Examination of the Welwyn Hatfield Local Plan.

[24] See: Mel Middleton, Inspector (December 2017) Note – Green Belt Assessment, Independent Examination of the Welwyn Hatfield Local Plan.

[25] Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan.

[26] Mel Middleton, Inspector (December 2017) Welwyn Hatfield Local Plan Examination Green Belt Assessment

Assessment process:

- Green Belt should be assessed against the purposes set out in NPPF. The methodology must clearly set out how the purposes have been interpreted and should respect the local context, for example in relation to the definition of key terms, whilst reflecting the PPG.
- In terms of interpreting the national Green Belt purposes, definition of terms is of key importance to a successful and transparent assessment. Guidance on the interpretation of the purposes and the criteria to be used for assessment of Purposes A, B and D is provided by the Green Belt PPG. The GBA needs to establish appropriate criteria for Purposes A, B and D, reflecting the illustrative factors identified in the PPG.
- The definitions of large built up areas, neighbouring towns and historic towns used for the assessment of Purposes A, B and D respectively, are not villages. There should be no ambiguity in the definition, and the adopted definitions should align with the settlement hierarchy where appropriate.
- The essential characteristics of openness and permanence should be considered within the performance assessment. Various planning appeals and the PPG have highlighted important considerations around the interpretation and importance of 'openness of the Green Belt' and these should be applied in a GBA.
- Historically some authorities have scoped out Purposes D and E due to the local context, which was considered appropriate at the time. However, given the need to identify whether Green Belt release will fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan as part of the development of the exceptional circumstances case, it is necessary for the assessment of performance to cover all the purposes.
- When authorities are assessing whether an area can be removed from the Green Belt, consideration should be given to the presence or otherwise of readily recognisable, and likely to be permanent boundary features. This should be considered within the Stage 2 GBA to enable authorities to refer back to the evidence later in the plan making process.

Grey belt identification:

- Grey belt needs to be provisionally identified within the GBA as part of plan making, following the process set out in the PPG. However, not all grey belt will necessarily be allocated for development or released from the Green Belt. It will be for the Council to decide the extent to which this takes place in considering the balance of planning factors as part of the wider plan making process.
- When identifying grey belt, the area of search should be focused on sustainable locations in line with NPPF paragraph 155c. Within sustainable locations, the identification of grey belt will be based on the performance scores for NPPF Purposes A, B and D.
- A GBA can only provisionally identify grey belt areas due to the need for further assessment at a later stage of the plan making process to identify any effects on footnote 7 designations. This will confirm grey belt status or otherwise.
- The draft NPPF (Dec 2025) has proposed an updated definition in respect of grey belt, whereby footnote 7 constraints would no longer being considered in the determination of grey belt. At this time, it is still appropriate to consider the presence of footnote 7 constraints, as the draft NPPF is yet to be adopted.

Release of Green Belt land:

- Any proposed changes to the Green Belt boundary or release of Green Belt land will need to be supported by a robust exceptional circumstances case, which is fully justified and evidenced.
- The GBA will only provide the starting point for any exceptional circumstances case and it will be necessary for the Council to develop such a case, both at strategic and site level, as part of the wider Local Plan process.
- A new 'fundamentally undermine' test has been introduced, which will need to be set out as part of any exceptional circumstances case.

- When considering the ‘fundamentally undermine’ test, considering the proportional loss of total Green Belt within an authorities’ area may be helpful, whilst being mindful of the context of the Green Belt within the plan area (i.e. is it a rural or urban area).

Fundamentally undermine test:

- A new ‘fundamentally undermine’ test has been introduced, which will need to be set out as part of any exceptional circumstances case. Although the development of such a case lies outside the scope of this study, some high-level conclusions of what constitute ‘fundamentally important’ parcels could be drawn at Stage 1, to inform this case later in the plan making process, once the combination of sites for release are known.
- When considering the ‘fundamentally undermine’ test, consideration of the proportional loss of total Green Belt within the district may be helpful.

4. Methodology

4.1 Overview

The following section details the GBA methodology for Staffordshire, which includes an overview of the NPPF purposes and overall assessment.

Duty to Cooperate engagement on the proposed methodology, including grey belt identification, was undertaken by the Councils in December 2025. The comments received and the associated responses are summarised in Appendix C.

4.2 Green Belt assessment methodology

4.2.1 Overview

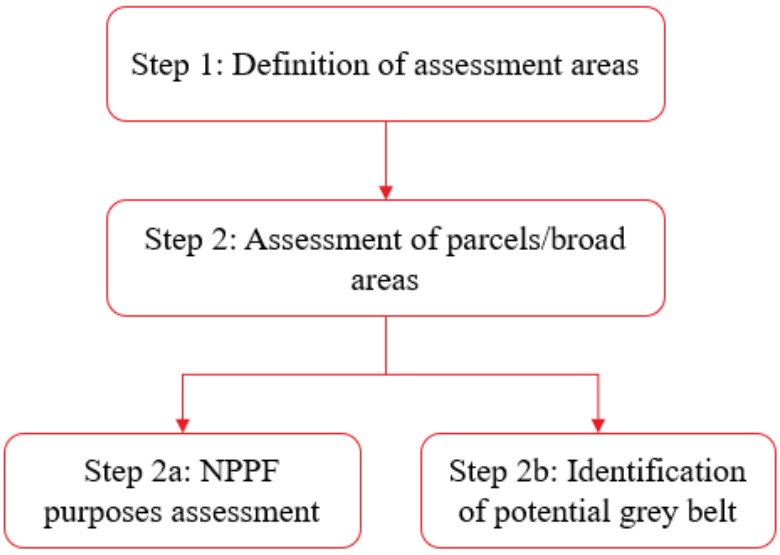
The assessment aims to provide an understanding of the performance of the Green Belt across the whole study area by dividing the Green Belt into parcels and broad areas and assessing these against the five Green Belt purposes. Parcels were defined around large built up areas, inset settlements and proposed allocations as agreed with the Councils, with broad areas identified in the remaining areas of the Green Belt. Following the assessment of the parcels against the five purposes, potential grey belt was also identified.

As such, the GBA sought to ascertain:

- Whether all land designated fulfils the Green Belt purposes; and
- Where parcels and broad areas are significantly granular, to be able to identify potential grey belt land.

The overall process to undertake the assessment is summarised in Figure 4.

Figure 4. GBA methodology diagram



4.2.2 Step 1: Definition of assessment areas

Step 1 is based on defining areas called ‘parcels’ and ‘broad areas’ for assessment in this study. The scale of parcels and broad areas seeks to strike a balance between providing a strategic overview of the Green Belt and sufficient granularity to enable the assessment of the parcels and broad areas’ variable contribution to Green Belt purposes.

The outer boundary of the study area is the edge of the West Midlands Green Belt, except where that carries on beyond the study area, in which case the authority administrative boundary has been used. It is recognised that this outer boundary may not always coincide with defensible boundary features, however the assessment of parcels and broad areas had regard to boundary features within reasonable proximity to provide a broader context. Parcels and broad areas will however be defined across the five authorities' boundaries whose Green Belt is being assessed in this study (where necessary), to ensure a strategic view of the Green Belt across this region of Staffordshire.

Consideration was also given to the latest Call for Sites information submitted as part of the Local Plan processed where the information was available.

The parcels and broad areas used for assessment are shows in Figure 5.

Parcel definition

The parcels were defined around the main urban areas of Cannock (including Cheslyn Hay, Great Wyrley, Hednesford and Huntington), Lichfield, Tamworth and Rugeley, the smaller towns, inset villages[27] and inset employment locations. The urban area/settlement inset boundary represents the inner extent of the Green Belt, and a single ring of parcels was defined from the urban area/settlement boundaries outwards. As the West Midlands conurbation abuts the boundary of this study, parcels were also defined from the outer edge of the conurbation. In addition, the new inset areas in the Green Belt proposed in the Cannock Chase Local Plan were also used to define parcels on the basis that they have a degree of planning certainty given the plan was at examination.[28]

Parcels were defined using defensible boundaries (see Table 1) and were defined on a desktop basis using Ordnance Survey MasterMap, and aerial imagery. A sense check of the boundaries on the ground took place during the site visits, to ensure that they reflect the desktop analysis. Only existing features were used as a basis for defining parcels, with the exception of HS2 Phase 1 (where applicable), which is currently under construction and therefore provides sufficient certainty to be utilised as a boundary feature. No minimum or maximum parcel size was set, and professional judgement was applied where it is considered that the nearest defensible boundary results in a parcel which was too large and/or more akin to a broad area (see following section). In such cases a less defensible boundary will be used instead, with the rationale for this being clearly set out. Where possible and reflecting appropriate defensible boundaries, parcels were defined to contain areas which had a similar character.

Due to the presence of Cannock Chase National Landscape, which is primarily composed of forest and heathland, is some instances around the urban areas and inset settlements, such as north of Hednesford and west of Upper Longdon, there were no defensible or less defensible boundaries that could be used to define a parcel. Therefore, in these instances, a broad area has been defined up to the settlement edge.

Table 1. Categorisation of boundary features

Boundary Distinction	Type / Features
Defensible boundary – features which are readily recognisable and likely to be permanent	Infrastructure / man-made features: • Motorway. • Public roads (including A and B roads, and minor roads). • Railway lines (in use and under construction e.g. HS2 Phase 1 line). • Canals. • Disused railway.

[27] For this study it was agreed that for South Staffordshire's authority area, only the settlements within Tiers 1-4 of their adopted settlement hierarchy would have a ring of parcels defined around them.

[28] Cannock Chase's Local Plan was successfully adopted in March 2026 including the proposed release of some Green Belt sites. These release sites have not been reassessed through this GBA. In addition, the proposed inset areas were not considered as part of the large built up area or town under Purpose A and B due to the status of the Local Plan when the Green Belt Assessment was undertaken.

Boundary Distinction	Type / Features
	• Existing development which is strongly established and permanent and which is demarcated by a number of features together. Natural features: • Rivers, large waterbodies (reservoirs, lakes, meres), and watercourses (streams, beck, brook). • Protected woodland (e.g., TPO, Ancient Woodland). • Mature unbroken tree belt or unbroken line of protected trees (TPO). Multiple boundary features: • Where there are a number of boundary features which on their own may be considered to be less defensible, the combination of these boundary features together could create a defensible boundary (for example, a narrow public road adjoining a strongly visible field ditch watercourse).
Less defensible boundary – features which are recognisable but less likely to be permanent	Infrastructure / man-made features: • Narrow or single lane public roads, unclassified public roads, private or un-made roads. • Distinguishable bridleway or footpaths (i.e. where supported by other features such as a hedgerow planting and built boundary features). • Existing development with irregular boundaries or which lacks permanence or is demarcated by less defensible features (e.g. fence, garden hedge). Natural features: • Smaller water features or non-defined watercourses e.g. field ditch, culverted watercourse. • Field boundary on its own or with planted and / or built / fence enclosures. • Unbroken hedgerow / vegetation corridor, broken and sparse tree line, or broken and sparse woodland, tree belt or hedgerow / vegetation corridor.
Undefined	A boundary which is not defined by any features on the ground.

Broad area definition

Following the definition of parcels, the remaining areas of Green Belt were divided into 'broad areas'. These were defined using the strongest defensible infrastructure boundaries of motorways, A roads and railway lines. No maximum or minimum size was adopted for the broad areas, with professional judgement applied. The broad areas were defined on a desktop basis only.

The broad areas were assessed against the same detailed assessment criteria as the parcels in order to ensure consistency across the assessments. It is however acknowledged that given the scale of these, some parts of each broad area are likely to perform slightly differently to other parts, and the assessment therefore sought to make a judgement for the broad area as a whole.

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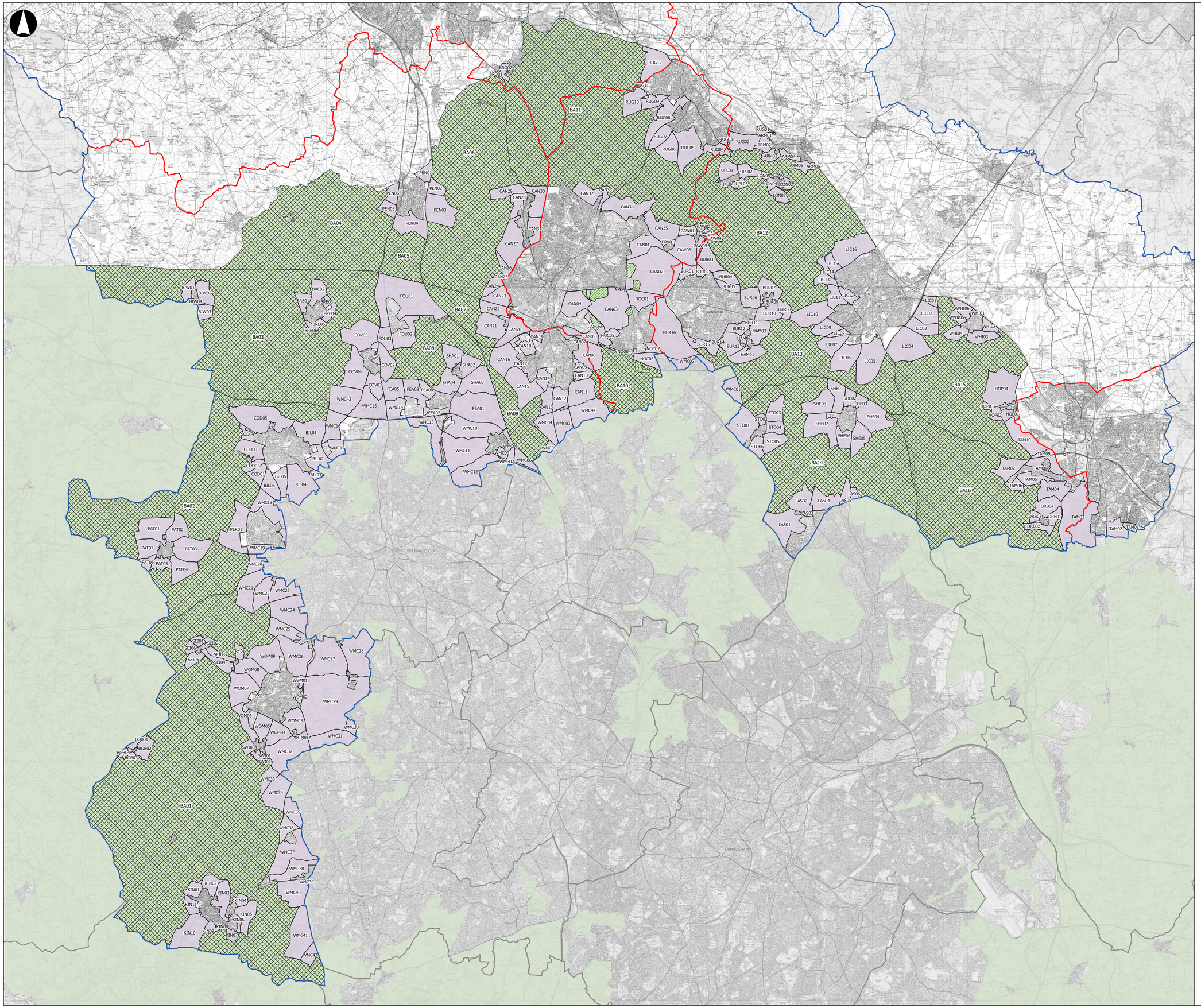

Coordinate System: British National Grid

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Metres

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Client

Staffordshire authorities

Project Name

Staffordshire Green Belt Assessment

Drawing Title

Figure 5. Parcel and broad area extents used for assessment

Scale at A1

1:74,000

Role

Planning

Suitability

Final

Project Number

313903-00

Rev

P01

Drawing Number

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Step 2a NPPF purposes assessment

The intention of the assessment is to establish any differentiation in terms of how the assessment areas in the existing Green Belt function and fulfil the NPPF Green Belt purposes.

Each of the assessment areas were assessed against the purposes of Green Belt, as set out in the NPPF. The Green Belt PPG provides guidance on how to assess Purposes A, B and D and the guidance was used to set the assessment criteria for those purposes. No national guidance exists for Purposes C and E and the assessment criteria for these purposes were based on previous experiences, best practice and recent examples set out in section 3. In both cases, and where possible, consideration was given to the need to respect local circumstances and the unique characteristics that affect the way the NPPF Green Belt purposes are appraised.

Openness and permanence are essential characteristics of Green Belt; and were therefore integral to the assessment of Green Belt across all purposes. Openness was considered not only in terms of a 'volumetric approach' (i.e. physical coverage of built form) but also in terms of 'visual elements'.

In terms of rating the Green Belt purposes, a four-point qualitative rating system is applied to each purpose and to the overall assessment. This is set out in Table 2 below. The ratings relate to the assessment area's level of contribution to Green Belt purposes, and the assessment approach is consistent with that provided in the PPG.

Table 2. Purpose ratings used in the Green Belt Assessment

Rating	Equivalent Wording
Strong	Strong contribution to Green Belt purpose(s)
Moderate	Moderate contribution to Green Belt purpose(s)
Weak	Weak contribution to Green Belt purpose(s)
No contribution	Does not contribute to Green Belt purpose(s)

It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine whether, overall, Green Belt assessment areas were meeting Green Belt purposes strongly or weakly.

The following sections examine the definition of each of the five purposes of the Green Belt in relation to local context; and set out the criteria and scoring applied.

A pro-forma was prepared to capture the assessments against each purpose for the Green Belt parcels and broad areas. The assessments were based on:

- desk research using a mix of evidence base sources, calculations of built form coverage based on OS MasterMap data, and aerial and topographical mapping information; and
- primary evidence obtained through site visits to each parcel.

Purpose A – To check unrestricted sprawl of large built up areas

The original strategic purpose of the West Midlands Green Belt was to check the sprawl of the West Midlands conurbation (in effect the areas not covered by the Green Belt). It is worth noting, there have been some incremental changes to the Green Belt boundary since the original extent was set, however this strategic purpose still remains the same. Additionally, it is recognised that the wider Green Belt also plays a role in preventing the unrestricted growth of other large built up areas.

National policy provides some guidance over what might constitute 'large built up areas' by stating that '*Villages should not be considered large built up areas'* (Green Belt PPG, paragraph 005). With a view to helping provide a robust and comparable definition of large built up areas, ONS[29] data provides a

[29] www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/townsandcitiescharacteristicsofbuiltupareasenglandandwales/census2021

classification of built up areas based on population range, with settlements of a population 75,000-199,999 being classed as 'large' and those over 200,000 being classed as 'major'. Settlements within the study area and neighbouring authorities which fell within the 'large' and 'major' classes were considered large built up areas for the purpose of this study. This is applicable to the Cannock, Cheslyn Hay, Great Wyrley, Hednesford and Huntington area, Tamworth and the West Midlands Conurbation.

In addition, the Minister of State (Housing, Communities and Local Government) has confirmed that LPAs can use necessary judgment to form a locally appropriate definition of large built up area[30]. For the Staffordshire GBA, consideration has been given to the lack of a national planning definition of a 'large built up area' and that the PPG does not exclude towns from consideration under Purpose A[31]. Therefore, on this basis, it was deemed appropriate to consider Burntwood, Lichfield City and Rugeley as large built up areas based on the role they play in their respective authorities' spatial strategies (i.e. top tiers and main focus for development). Whilst there are other urban areas nearby of sufficient scale to be classified as large built up areas, including Stafford, they are not considered under Purpose A to their distance from the West Midlands Green Belt or distance from the study area.

The extent of each large built up area was considered to be all of the contiguous inset development associated with each settlement, including any other adjacent settlements. For example, the villages of Fazeley and Mile Oak are both connected to Tamworth through a contiguous area of inset development along the B5404 and Tamworth Road, with there being no discernible physical separation between the settlements. Therefore, it was considered appropriate to consider these as all parts of the Tamworth large built up area. There are other similar instances across the study area, particularly around the edge of the West Midlands conurbation.

It was agreed that the large built up areas listed in Table 3 and shown in Figure 6[32] were considered appropriate to be considered in the assessment of Purpose A.

Table 3. Large built up areas considered in Purpose A assessment

Staffordshire authorities	Neighbouring Local Authorities
Burntwood Cannock, Cheslyn Hay, Great Wyrley, Hednesford and Huntington (as one area) Lichfield City Tamworth (including Fazeley and Mile Oak) Parts of the West Midlands Conurbation which continue over into Staffordshire (including Essington)[33] Rugeley (including Brereton)	West Midlands Conurbation

[30] https://questions-statements.parliament.uk/written-questions/detail/2025-07-16/68562

[31] Paragraph: 005 Reference ID: 64-005-20250225 sets out that villages should not be considered large built up areas - https://www.gov.uk/guidance/green-belt

[32] Note, the large built up areas on the map are for the purposes of this study only, noting that settlement boundaries within in adopted and emerging Local Plans, and 'made' Neighbourhood Plans may differ.

[33] There are a number of examples where the built form of the West Midlands conurbation that is inset from the Green Belt continues mostly unbroken into the study area, largely in South Staffordshire. This includes built form along Cannock Road, Radford Lane / Castlecroft Lane, Langley Road and Showell Lane / Stourbridge Road area from Wolverhampton; and around Wollaston Road from Dudley. Whilst Perton was treated in a similar way in the previous South Staffordshire Green Belt Study, it is not considered part of the West Midlands conurbation in this study as it is separated from the conurbation by an area of Green Belt around its boundary (noting this is small in places, and only contains limited pockets of built form with no major road connecting the settlement to the conurbation along its inner boundary) and it is considered a village in the settlement hierarchy within the South Staffordshire Local Plan. For Essington, the built form along Upper Sneyd Road and High Hill demonstrate a continuous physical connection to the West Midlands conurbation and is therefore included in the definition of the large built up area.

Although ‘sprawl’ is a multi-faceted concept and thus has a variety of different definitions, this GBA has adopted a simple definition, where sprawl is considered as the outward spread of a large built up area at its periphery in a sporadic, dispersed or irregular way.

Green Belt should function to protect open land at the edge of large built up areas. The extent to which an assessment area prevents sprawl is dependent on:

- Whether it is adjacent or near to the built up area. Consideration should be given to whether it is physically, visually or functionally linked to a large built up area. To be considered adjacent, the area should physically adjoin the defined large built-up area along one or more boundaries. To be considered near to, the area should be visually or functionally linked to the large built up area. A functional link to the large built-up area could be the presence of continuous built form (e.g. development along a road). A visual link to the large built up area is when it is not separated by open countryside and/or it could be perceived as forming part of the large built up area.
- If it was to be developed, the extent to which it would result in an incongruous pattern of development (such as an extended ‘finger’ of development into the Green Belt).
- Presence of physical feature(s) in reasonable proximity that could restrict and contain development. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. Motorway, A-road, railway line, major river or significant topographical feature) that might restrict the scale of outward growth of the settlement and regularise potential development form.
- Its relationship with the respective built up area(s), in particular the degree / nature of containment by built form. Assessment areas that are almost entirely surrounded by built development as part of a single built up area (enclosed) do not prevent sprawl, rather potential development could be classified as infill (Figure 6). Whereas assessment areas between two built up areas (contiguous) or on the edge of a built up area (connected) also have a role in preventing sprawl.
- Degree of openness, i.e., the extent to which an assessment area already contains built development. If the assessment area is fully developed, it does not meet the basic aim of Green Belt (NPPF paragraph 142).
- Whether the assessment area is subject to other urbanising influences, such as existing residential or commercial development, however, not including development that would be considered as appropriate in the Green Belt (see NPPF paragraph 154).

Figure 6. Illustration of Connected, Contiguous and Enclosed Sites

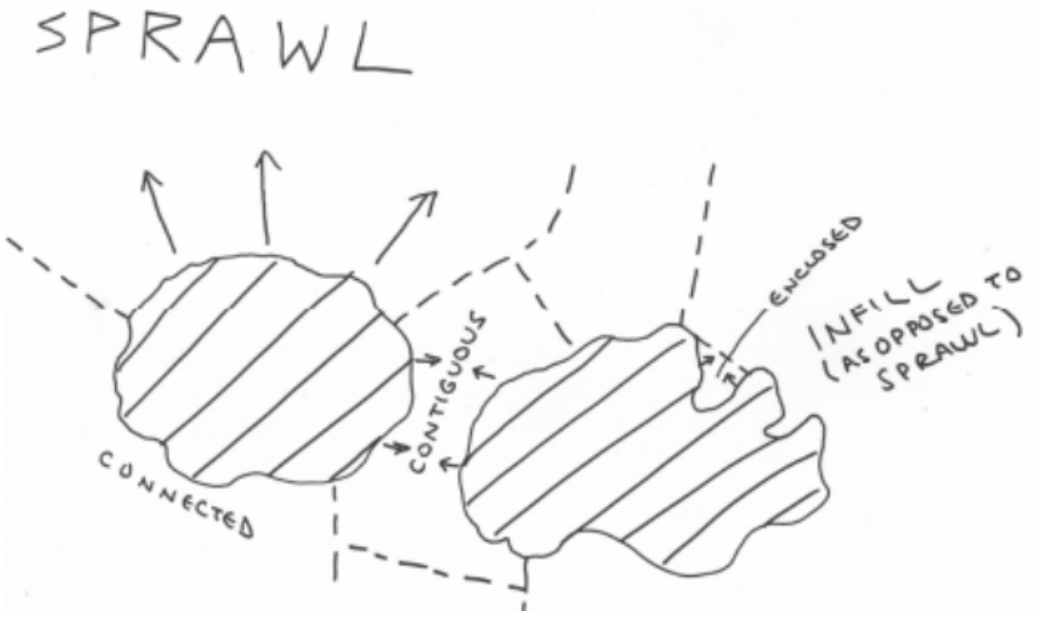


Figure 7. Large built up areas considered in Purpose A assessment

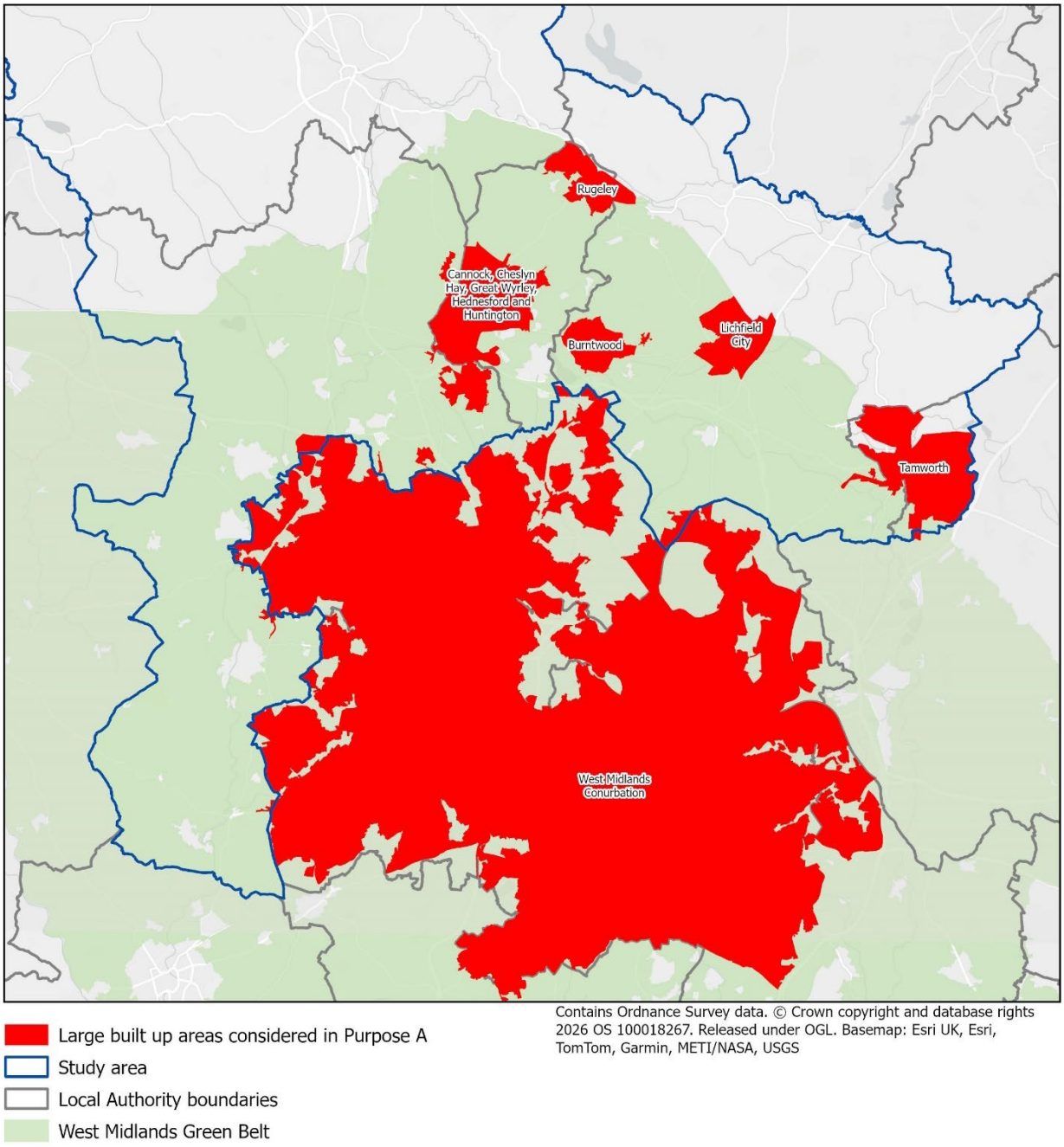


Table 4. Purpose A assessment criteria

Purpose	Assessment Criteria
A	Prevents the outward, irregular spread of a large built up area and serves as a barrier at the edge of a large built up area in the absence of another defensible boundary.
Rating	**Description**
Strong	Assessment area is adjacent or near to a large built up area. The assessment area is likely to be free of existing development and / or other urbanising influences. There are no prominent physical features along the edge of the existing large built up area or in reasonable proximity to the outer edge of the assessment area. If developed, the assessment area would result in a disproportionate / incongruous pattern of development. OR

	Assessment area is contiguous with two or more large built up areas. The assessment area is free of existing development and / or other urbanising influences.
Moderate	Assessment area is adjacent or near to a large built up area. The assessment area contains some existing development and / or other urbanising influences. There are some prominent physical features in reasonable proximity to the outer edge of the assessment area, and / or the inner edge of the existing large built up area comprises some prominent physical features. Where partially enclosed by the large built up area, new development would not result in a disproportionate / incongruous pattern of development.
Weak	Assessment area is adjacent, near to, enclosed or partially enclosed by a large built up area. The assessment area contains extensive existing development and / or other urbanising influences. There are prominent physical features in reasonable proximity to the outer edge of the assessment area and along the edge of the existing large built up area. If developed, the assessment area will not result in a disproportionate / incongruous pattern of development.
No contribution	Assessment area is not adjacent or near to a large built up area, in physical or perceptual terms, and does not meet Purpose A. OR Assessment area contains significant existing development.

Purpose B – To prevent neighbouring towns merging into one another

Purpose B considers the role that the Green Belt plays in preventing neighbouring towns from merging into one another. The assessment considered gaps between towns in the Staffordshire authorities' areas, and towns in surrounding authorities. National policy provides guidance over what might constitute 'towns' by stating that 'this purpose relates to the merging of towns, not villages' (Green Belt PPG, paragraph 005).

The definition of towns within the study area for Purposes B followed a consistent approach with the definition of large built up areas used in Purpose A. For the purpose of this assessment, neighbouring towns include defined large built up areas (defined in Purpose A) and towns identified from adopted settlement hierarchies of each authority. This means in the context of this study**,** Cannock Chase, Cheslyn Hay, Great Wyrley, Hednesford and Huntington will be considered as a 'town' even though it is acknowledged that Cheslyn Hay, Great Wyrley and Huntington are considered locally as villages. The same applies to Tamworth and Fazeley and Mile Oak, and Rugeley and Brereton. It is also acknowledged that Lichfield is a city, however, will be considered a 'town' in the assessment of this purpose.

Due to the nature of the West Midlands conurbation, which is a contiguous urban area with a mix of merged towns and places (where official boundaries between settlements are not generally identifiable on the ground), and through discussions with the Councils, it was agreed that towns that are part of the West Midlands conurbation would be treated as one 'town'. It is acknowledged that there are areas within the conurbation which are surrounded by Green Belt (with strong physical connections to the rest of the conurbation) and could be identified as separate towns (such as Tettenhall, Brownhills and Aldridge), however it was considered that this would make limited difference to the assessment under this purpose beyond references to the names of these particular towns. In addition, in places on the edge of the conurbation, there are wedges of Green Belt that extend into the built form which imply a degree of separation despite the built form being contiguous around these wedges. For the purposes of this study, the further merging of these areas is considered as a sprawl issue under Purpose A rather than the merging of towns under Purpose B[34].

[34] Specific consideration was given to the area of Green Belt between Dudley and Wolverhampton which continues into South Staffordshire to see if towns were defined in the neighbouring authorities' areas. However, there was lack of clarity within the emerging Wolverhampton or Dudley Local Plan and in the previous Black Country Green Belt study over the extent of the identified towns (i.e. where one started/stopped).

For towns within neighbouring local authorities that were outside the West Midlands conurbation, their settlement hierarchies[35] were reviewed to inform the list of neighbouring towns. Only neighbouring towns within close proximity of the Green Belt within the study area and which could be considered to form a gap with Staffordshire's towns were included in the assessment, as listed in Table 5 and shown in Figure 8[36].

Table 5. Towns considered in Purpose B assessment

Staffordshire authorities	Neighbouring Local Authorities
Burntwood Cannock, Cheslyn Hay, Great Wyrley, Hednesford and Huntington (as one town) Lichfield City Tamworth (including Fazeley and Mile Oak) Rugeley (including Brereton) Stafford	Adjacent authorities within the wider West Midlands conurbation Albrighton Kidderminster

The Purpose B criterion considers the extent to which assessment areas protect a gap and prevent towns from merging through sprawl or ribbon development. The extent to which an assessment area prevents towns merging is dependent on:

- Its relationship with towns and whether it lies within a gap between neighbouring towns.
- Degree to which development of an assessment area would reduce the perceived or actual distance between towns.
- Presence of physical feature(s) in reasonable proximity that would visually or physically prevent the coalescence of neighbouring towns. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. Motorway, A-road, railway line, major river or significant topographical feature) that will influence the degree to which visual separation will be maintained.
- Degree of openness, i.e. the extent to which an assessment area already contains built development or is subject to other urbanising influences. If the assessment area is fully developed, it does not meet the basic aim of Green Belt (NPPF paragraph 142).

[35] In the settlement hierarchies for the neighbouring authorities of Shropshire and Wyre Forest the towns listed in Table 5 were considered to be in the top tier of settlements in their respective hierarchies or referred to as a town within the adopted Local Plan document and evidence base. See Wyre Forest District Council, (2022), Local Plan 2016-2036; Shropshire Council, (2011), Shropshire Local Development Framework: Adopted Core Strategy.

[36] Note, the towns on the map are for the purposes of this study only, noting that settlement boundaries within in adopted and emerging Local Plans, and 'made' Neighbourhood Plans may differ.

Figure 8. Towns considered in Purpose B assessment

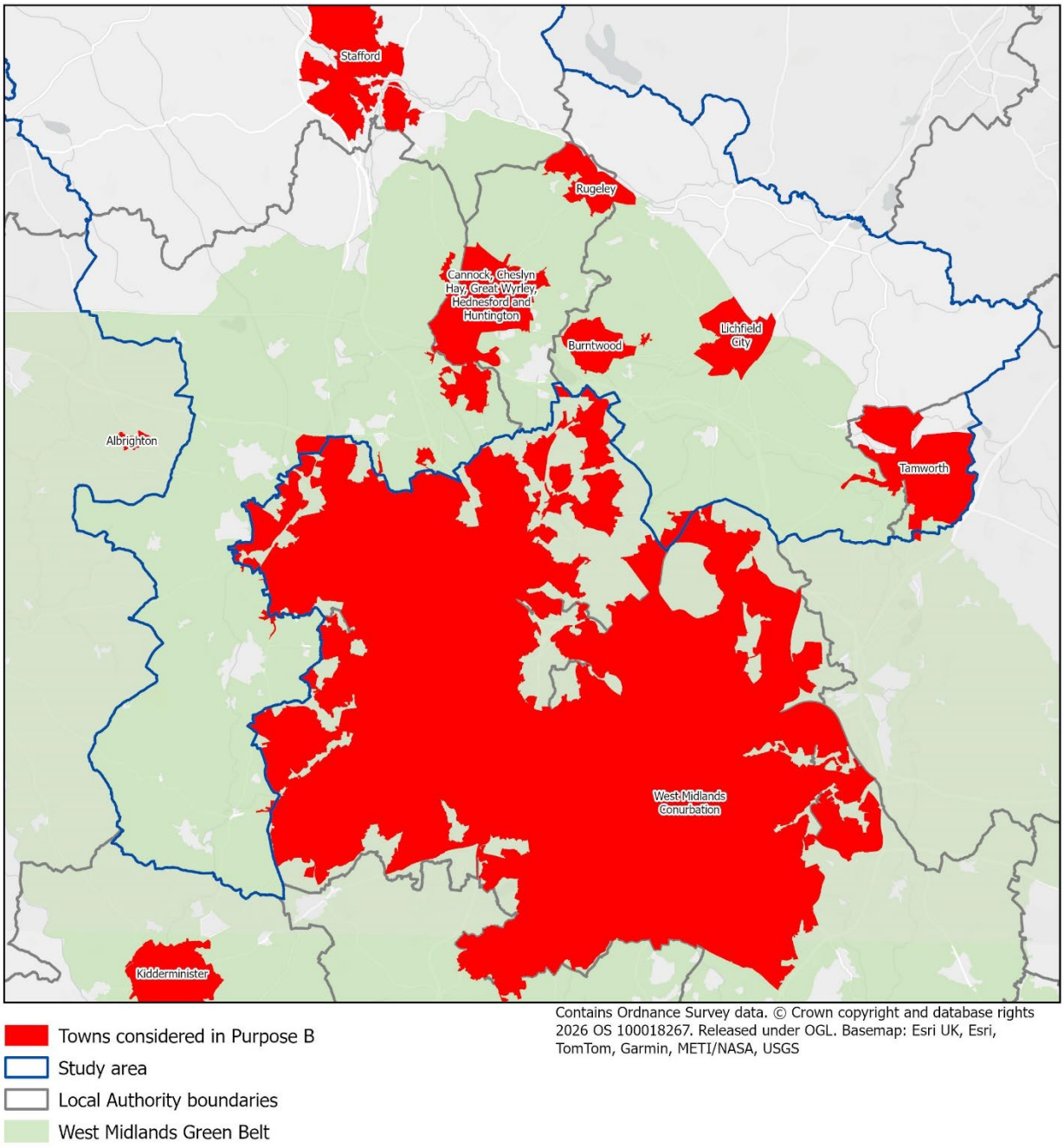


Table 6. Purpose B assessment criteria

Purpose	Assessment Criteria
B	Restricts development that would result in merging of or significant erosion of the gap between neighbouring towns.
Rating	**Description**
Strong	Assessment area is likely to be free of existing development and forms a substantial part of a gap, where development would result in loss of visual separation or physically reduce the perceived or actual distance between towns.
Moderate	Assessment area forms a small part of a gap, where there is scope for some development without the loss of visual separation or physically reducing the perceived or actual distance between towns.

Weak	Assessment area forms a very small part of a gap, without making a contribution to visual separation, where development would not physically reduce the perceived or actual distance between towns.
No contribution	Assessment area does not form part of a gap between towns.

Purpose C – To assist in the safeguarding the countryside from encroachment

The approach to purpose C considered the extent to which Green Belt has maintained the openness and character of the countryside and conversely resisted urbanising influences. The interpretation of Purpose C for this study has considered openness and the degree to which the Green Belt can be characterised as countryside[37], with the existing use of the assessment area being an important consideration.

Openness is considered as the absence of built development. This has both a spatial and visual dimension. The spatial dimension relates to the amount of built form from any man-made structure, feature, or facility. This does not include the relevant exception categories in paragraph 154 NPPF (e.g. buildings for agriculture and forestry, facilities for outdoor sport and recreation etc.) provided they preserve openness. The visual dimension relates to how that openness is perceived, and is influenced by factors such as topography, vegetation and views. Openness should be assessed from the edge of the urban area outwards. To aid this assessment, the percentage of built form within the assessment area was calculated to inform the degree of openness, see Table 8.

Table 7. Purpose C assessment criteria

Purpose	Assessment Criteria
C	Protects the openness of the countryside with existing uses being predominantly rural.
Rating	**Description**
Strong	Assessment area largely consists of open countryside and/or rural land uses, with less than 10% built form, and has a strong / strong-moderate degree of openness and is surrounded by open countryside along most of its boundaries.
Moderate	Assessment area partly consists of open countryside and/or rural land uses however it also includes some semi-urban land uses. It has a moderate / moderate-weak degree of openness and/or it is partly enclosed by existing development or by the urban area along some of its boundaries impacting the sense of openness.
Weak	Assessment area consists of urban or semi-urban development and land uses and has a weak / weak-no degree of openness and/or it is completely enclosed by existing development or by the urban area along a number of boundaries impacting the sense of openness.
No contribution	Assessment area is completely developed and consists of urban land uses and has no degree of openness.

Table 8. Degree of Openness Matrix

Spatial openness	Visual openness / degree of openness
Less than 10% built form	• Open long line views = **strong degree of openness**

[37] Countryside has been defined as *"the land and scenery of a rural area that is either used for farming or left in its natural condition"* (Oxford English Dictionary and Cambridge Dictionary). The Government's Rural Urban Classification stated that "*Urban areas are determined as settlements with populations of 10,000 or more, based on the 2021 Census. Rural areas are everywhere else and will include rural towns, villages, hamlets, isolated dwellings and open countryside.*", available here: https://www.gov.uk/government/collections/rural-urban-classification#2011-census-rural-urban-classification

Spatial openness	Visual openness / degree of openness
	• Long line views in parts but other views restricted by topography, built form or vegetation = **strong-moderate degree of openness** • No long line views (views restricted by topography, built form or vegetation) = **moderate degree of openness**
Less than 20% built form	• Open long line views = **strong-moderate degree of openness** • Long line views in parts but other views restricted by topography, built form or vegetation = **moderate degree of openness** • No long line views (views restricted by topography, built form or vegetation) = **moderate-weak degree of openness**
Between 20%-30% built form	• Open long line views = **moderate degree of openness** • Long line views in parts but other views restricted by topography, built form or vegetation = **moderate-weak degree of openness** • No long line views (views restricted by topography, built form or vegetation) = **weak degree of openness**
More than 30% built form	• Open long line views = **weak degree of openness** • Long line views in parts but other views restricted by topography, built form or vegetation = **weak-no degree of openness** • No long line views (views restricted by topography, built form or vegetation) = **no degree of openness**

Purpose D – To preserve the setting and special character of historic towns

Purpose D considers the extent to which an assessment area protects land in the immediate and wider context of a historic town.

National policy provides guidance over what might constitute 'historic towns' by stating that 'this purpose relates to historic towns, not villages' (Green Belt PPG, paragraph 005). Key historic towns have been defined as settlements which are considered towns for the purpose of Purpose B, and which have a historic significance.

In relation to the towns within the study area, a review of the available evidence was undertaken. The outcome of this was as follows:

- Cannock – Cannock Town Centre Conservation Area[38] is located within the centre of Cannock. The area was designated in 1991 and covers the centre of the town, which dates back to the medieval period with a medieval street layout based upon a broad marketplace. The Conservation Area is largely surrounded by built form, however, it is considered the 'historic core' of Cannock. **Identified as a historic town. Relevant Conservation Area for the purposes of the assessment: Cannock Town Centre Conservation Area.**
- Lichfield City – Lichfield City Centre is a designated Conservation Area, which, as outlined in the Lichfield City appraisal[39], was first designated in 1970. In 1998, the Lichfield Gateway Conservation Area was designated, although Lichfield District Council's Conservation Area Appraisal (2008) treats the two areas as an integrated designation, known as Lichfield City Conservation Area. The area is designated due to its varied built form with many buildings still on 12th Century burgage

[38] https://www.cannockchasedc.gov.uk/sites/default/files/site-old/mplan_cannock_nov16.pdf

[39] https://www.lichfielddc.gov.uk/downloads/file/447/lichfield-city-conservation-area-appraisal

plots, over 200 listed buildings, and a distinctive townscape with historic street patterns. Prominent historic landmarks characterising the City's special historic character are Lichfield Cathedral, St Mary's Church, St Chad's Church, and the Friary Clock Tower. The Conservation Area can be considered the 'historic core' of Lichfield. **Identified as a historic town. Relevant Conservation Area for the purposes of the assessment: Lichfield City Centre Conservation Area.**

- Rugeley – there are several Conservation Areas within Rugeley, although its 'historic core' could be defined by an amalgamation of four Conservation Areas located around the town centre. These are all located within close proximity to the Green Belt and include Rugeley Town Centre Conservation Area, the Sheepfair/Bow Street Conservation Area, the Talbot Street/Lichfield Street Conservation Area, and the Church Street Conservation Area. Other Conservation Areas of note are Main Road, Brereton and the Trent Mersey Canal Conservation Area, which are also located within Rugeley although they are not associated within the identified 'historic core' of Rugeley. **Identified as a historic town. Relevant Conservation Area for the purposes of the assessment set out below:**
    - Rugeley Town Centre Conservation Area[40] is located close to the West Midlands Green Belt. As outlined in the Rugeley Town Centre Management Plan, the area was designated in 1973 and covers the historic core of the market town. It is characterised by an informal street pattern of narrow winding streets, with building frontages of two and three storey height of varying plot width, design, period and materials, and seven are listed. Much of the Conservation Area dates from the 19th to early 20th Century. As such, it could be concluded that this represents the historic core of Rugeley, with the Green Belt in part preserving its setting. **Considered relevant for this GBA.**
    - The Sheepfair/Bow Street Conservation Area[41] lies adjacent to the West Midlands Green Belt. The Sheepfair/Bow Street Conservation Area Management Plan notes that the area was designated in 2004, given the area's traditional winding street pattern, largely 19th Century buildings, as well as the grounds of the former Hagley Hall at Elmore Park. Given the close proximity of the Green Belt, there is some visual and physical connection between the Green Belt and the Conservation Area. **Considered relevant for this GBA.**
    - The Talbot Street/Lichfield Street Conservation Area[42] is located close to the West Midlands Green Belt and was designated in 2002, covering the older and mainly residential areas around Rugeley town centre. As outlined in the Talbot Street/Lichfield Street Conservation Area Management Plan, the Conservation Area is characterised by diverse building types dating from the 19th and early 20th Centuries, including residential buildings, historic community buildings, a tightly built up 'urban' frontage to Horsefair, and brick arched railway bridges. The area includes Rugeley's Catholic Church and buildings constructed by people with connections to the Church, such as Heron Court. Given the Conservation Area's close proximity to the Green Belt and other Conservation Areas within Rugeley town centre, it is considered that this contributes to the 'historic core' of Rugeley. **Considered relevant for this GBA.**
    - Church Street Conservation Area[43] was designated in 1992, comprising four listed buildings and many other buildings of historic and visual interest. It is characterised by mainly residential buildings around the town centre of Rugeley, gaining its first market charter in 1259. Its location near to the Green Belt and the nearby surrounding Conservation Areas means that it is considered to contribute to Rugeley's 'historic core'. **Considered relevant for this GBA.**

[40] https://www.cannockchasedc.gov.uk/sites/default/files/site-old/rugeley_town_centre_ca_management_plan_nov16.pdf

[41] https://www.cannockchasedc.gov.uk/sites/default/files/site-old/sheepfair_bow_street_management_plan_jan_18.pdf

[42] https://www.cannockchasedc.gov.uk/sites/default/files/site-old/talbot_street_management_plan_update_feb19.pdf

[43] https://www.cannockchasedc.gov.uk/sites/default/files/site-old/church_street_management_plan_update_feb19.pdf

- Main Road, Brereton Conservation Area[44] was designated in 2002, comprising the core of the old village along Main Road. The Conservation Area is characterised for its special architectural and historic importance with a mix of grand houses, worker's cottages and community buildings. Brereton is considered separately from Rugeley, with it having its own local centre, therefore this Conservation Area is not considered to make up the 'historic core' of Rugeley, and therefore has not been considered for the purpose of this assessment. **Not considered relevant for this GBA.**

- The Trent and Mersey Canal Conservation Area[45] lies to the north of Rugeley town centre and is largely separated from the West Midlands Green Belt due to the built form of Rugeley. The area was designated in 1988, with nine listed buildings and many other buildings of historic and visual interest. However, despite the Conservation Area's close proximity to the Green Belt, its character is broadly linked to the Canal corridor rather than the town of Rugeley itself. Therefore, it has not been considered for the purpose of this assessment. **Not considered relevant for this GBA.**

- Stafford – there are multiple Conservation Areas in Stafford. However, as Stafford Town is not in close proximity to the edge of the West Midlands Green Belt, it was deemed the Green Belt does not act towards preserving the setting or special character of Stafford, even considering it is likely a historic town. **Not identified as a historic town in the context of this study.**

- Tamworth – there are multiple Conservation Areas in Tamworth. Of relevance to the Green Belt (due to the close proximity) are the Tamworth Town Conservation Area and the Dosthill Conservation Area. The Fazeley and Bonehill Conservation Area is nearby and covered by the West Midlands Green Belt, however, it was considered that this did not make up the historic core of Tamworth due to Fazeley being considered a separate rural settlement (within Lichfield District Council's authority area). **Identified as a historic town. Relevant Conservation Area for the purposes of the assessment set out below:**

  - The Tamworth Town Conservation Area[46] is located approximately 1km from the West Midlands Green Belt at its nearest point. Designated in 1976, the Conservation Area encompasses a diverse urban character, as outlined in the Tamworth Town Centre Conservation Area Management Plan. This ranges from the pedestrianised historic market street lined with 18th-century buildings, to more modern and traffic-heavy streets featuring 1960s high-rise developments. The area to the northwest of St Editha's Church is notably more open, while the southern portion is dominated by Tamworth Castle and its adjoining pleasure grounds. Although the Conservation Area contains several listed buildings, the Management Plan identifies the Castle and St Editha's Church as the two most prominent landmark structures. Given their significance and central location, this part of the Conservation Area can be considered the 'historic core' of Tamworth. While the original designation also included the Victoria Road and Albert Road Conservation Area, this is now a separate designation with limited relevance to the West Midlands Green Belt and has therefore been excluded from this assessment. **Considered relevant for this GBA.**

  - The Dosthill Conservation Area[47], at its closest point, lies immediately adjacent to the West Midlands Green Belt, with St Paul's Church touching the Green Belt boundary. As outlined in the Dosthill Conservation Area Management Plan, the Conservation Area was designated in 1985, primarily due to the designated area's Grade II listed church, Grade II* Norman Chapel, and the Church Farm complex, which contains various Grade II listed buildings. The Conservation Area has several distinct 'character zones, with the western part being characterised by the church and green churchyard. In contrast, the area around St Paul's

[44] https://www.cannockchasedc.gov.uk/sites/default/files/site-old/brereton_mpnov16.pdf

[45] https://www.cannockchasedc.gov.uk/sites/default/files/site-old/trent_mersey_management_plan_update_feb19.pdf

[46] https://www.tamworth.gov.uk/sites/default/files/planning_docs/Conservation/Town-Centre-Nov09.pdf

[47] https://www.tamworth.gov.uk/sites/default/files/planning_docs/Conservation/Dosthill-final-Nov09.pdf

Court is characterised by modern development and Church Farm Mews is centred around a historic farmstead. Whilst the Green Belt lies adjacent to this area, its limited size and physical separation from the centre of Tamworth means that it has not been considered as part of the 'historic core' of Tamworth for this assessment. **Not considered relevant for this GBA.**

For the remaining towns in neighbouring authorities considered in Purpose B, a review of the available evidence was undertaken. The outcome of this was as follows:

- West Midlands conurbation – although there are historic parts of the conurbation, noted by the presence of multiple Conservation Areas and other historical assets, there is generally large amounts of existing built form between the Conservation Areas and Green Belt. It was therefore deemed that the Green Belt within the study area could not be deemed as preserving the setting or special character of these areas. **Not identified as a historic town in the context of this study.**
- Albrighton – there are three Conservation Areas within the town of Albrighton, with these in places overlapping with the Green Belt. These include Albrighton Conservation Area, Albrighton: Station Road Conservation Area and Donington and Albrighton Conservation Area. **Identified as a historic town. Relevant Conservation Area for the purposes of the assessment set out below:**
    - The Albrighton Conservation Area[48] was first designated in 1981 and significantly overlaps with the Green Belt. The Conservation Area covers the High Street, nearby residential properties and extends to also cover the historic park and wooded grounds of Albrighton Hall. The High Street forms the main centre of the settlement, which was developed during the 18th and 19th centuries. There are views from the High Street towards the parkland, with the trees throughout being of great importance to Albrighton's character. As such, this can be concluded to be the historic core of Albrighton. **Considered relevant for this GBA.**
    - The Albrighton: Station Road Conservation Area[49] was first designated in 1982 and encompasses three buildings which are intended to reflect the social history of the settlement – its workhouse, school and school master's house. As such it could be concluded that this represents part of the historic core of Albrighton, however, as the Conservation Area is set away from the Green Belt, this does not act to preserve its setting. Therefore, it is not considered relevant to this study. **Not considered relevant for this GBA.**
    - The Donington and Albrighton Conservation Area was first designated in 1994. The Conservation Area includes the parish church of Albrighton (part of the high street), Albrighton Pool and the parish church of Donington (amongst other features), with the churches forming two centre points. This Conservation Area could be considered part of the historic core of Albrighton. However, as the Conservation Area is separated from the Green Belt within South Staffordshire by the built form of Albrighton, it is not considered relevant to this study. **Not considered relevant for this GBA.**
- Kidderminster – there are historic parts of Kidderminster with a number of Conservation Areas. However, due to the distance between the edge of the town and the Green Belt within South Staffordshire, with sufficient built form in between. It was deemed the Green Belt does not act towards preserving the setting or special character of Kidderminster, even considering it is likely a historic town. **Not identified as a historic town in the context of this study.**

Table 9 lists the settlements that were included within the assessment of Purpose D, with these also being shown, including the location of the defined historic core, in Figure 9[50].

[48] See Albrighton Conservation Area Appraisal (2008), available on request from Shropshire Council.

[49] See Albrighton: Station Road Conservation Area Appraisal (2008), available on request from Shropshire Council.

[50] Note, the historic towns on the map are for the purposes of this study only, noting that settlement boundaries within in adopted and emerging Local Plans, and 'made' Neighbourhood Plans may differ.

Table 9. Historic towns considered in Purpose D assessment

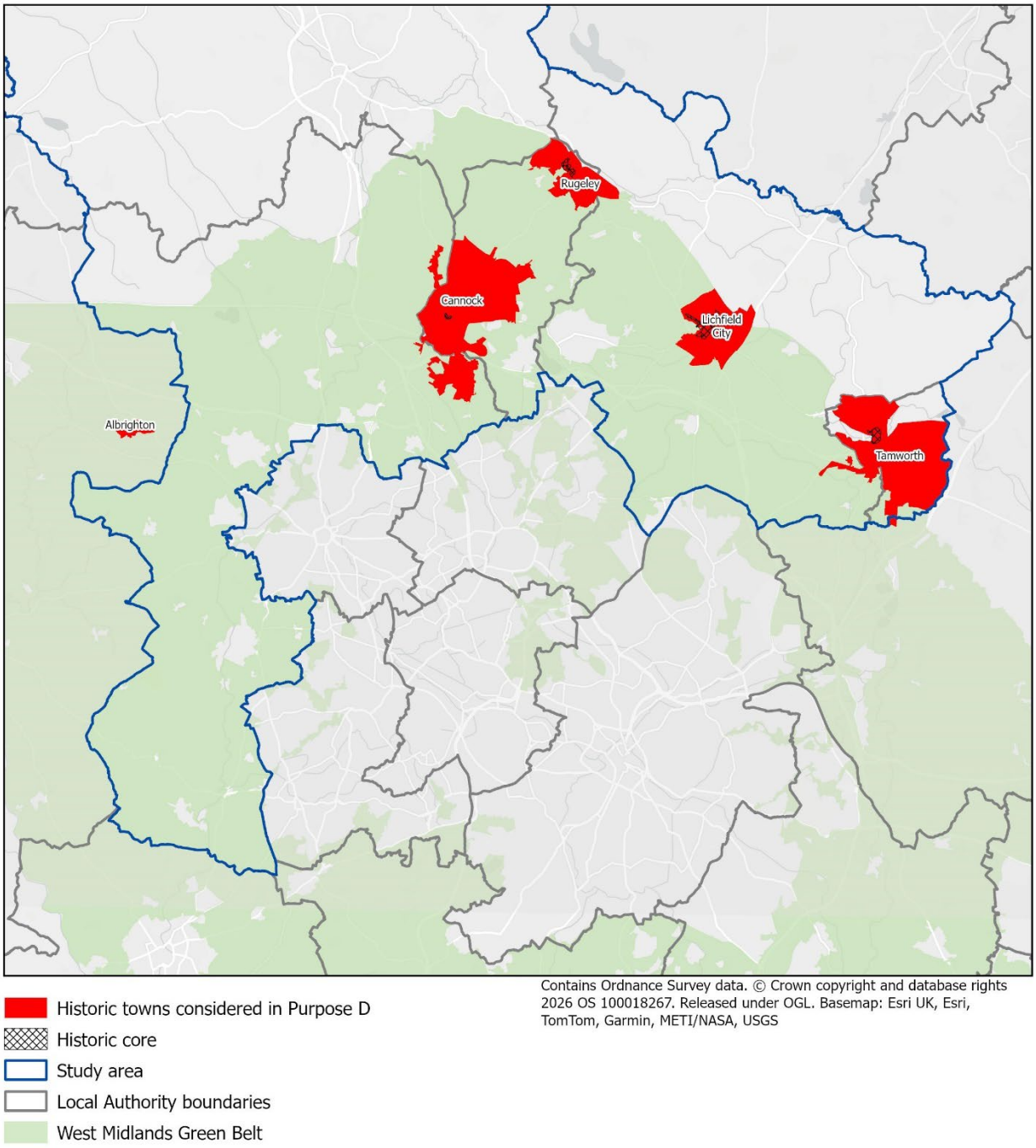
Staffordshire authorities	Neighbouring Local Authorities
Cannock Lichfield City Rugeley Tamworth	Albrighton

For Purpose D, the impact on the setting and special character will be assessed based on a review of the relevant Conservation Area Appraisals, and how development of nearby areas of Green Belt may impact on this Conservation Area (which is considered as the historic core of the historic town). Consideration will be given to separation from the historic core as a result of existing development and topography, and the visual, physical, or experiential relationship in establishing if the assessment area makes a contribution to the special character of the historic town.

Table 10. Purpose D assessment criteria

Purpose	Assessment Criteria
D	Protects land which provides immediate and wider context for a historic town, including views and vistas between the place and surrounding countryside.
Rating	**Description**
Strong	Assessment area is likely to be free of existing development. It forms part of the setting of the historic town and it makes a considerable contribution to the special character of the historic town.
Moderate	Assessment area forms part of the setting of the historic town, and/or it makes a contribution to the special character of the historic town.
Weak	Assessment area forms a limited part of the setting of a historic town and/or it makes little contribution to the special character of the historic town.
No contribution	Assessment area does not form part of the setting of a historic town and makes no contribution to the special character of a historic town.

Figure 9. Historic towns considered in Purpose D assessment



Purpose E – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Purpose E focuses on assisting urban regeneration through the recycling of derelict and other urban land.

Assessment against Purpose E is unlikely to lead to a differentiation between areas as it is difficult to attribute regeneration and brownfield land development to a particular area of Green Belt. It is the designation of all the areas collectively as Green Belt which encourages the recycling of derelict and other urban land. As such, it is not possible to apply the assessment of Purpose E for each assessment area. The performance of the Green Belt against this purpose has therefore been assessed for the entire Green Belt in Staffordshire.

There is no standard approach from other authorities for how thresholds should be set to determine what contribution the Green Belt makes to Purpose E. In a previous study for Cheshire East Council, thresholds were defined according to a range of the percentages which were calculated as brownfield urban potential across Cheshire East (shown in Table 11). It should be noted, that through the examination of Cheshire

East's Local Plan the approach to the assessment of Purpose E was not challenged by the Inspector (see Appendix A.2). The nature of this region across Staffordshire is considered similar to Cheshire East and therefore the same thresholds are applicable.

Table 11. Purpose E assessment thresholds as applied in the Cheshire East Green Belt Assessment

Purpose	Assessment Criteria
E	Brownfield capacity thresholds
Rating	**Description**
Strong	>5%
Moderate	>1-5%
Weak	>0-1%
No contribution	0%

To understand the potential for the Green Belt to assist in urban regeneration and to set an area wide purpose contribution, the brownfield supply, identified through the Councils' Brownfield Land Registers, has been considered as a percentage of the total existing number of dwellings within the authority area (see Table 12). This approach is on the basis that where brownfield capacity percentage is high (i.e. there are a lot of brownfield sites relative to the size of the settlement) then the Green Belt itself plays a more important role in assisting urban regeneration by encouraging brownfield sites to be developed rather than release Green Belt land. It should be noted that consideration has also be given to the role that the Green Belt plays in assisting urban regeneration of the West Midlands conurbation (which is the focus of the original designation of the Green Belt), as well as considering the local aspect.

Table 12 shows there is a reasonable difference between brownfield land capacity as a percentage of the existing number of dwellings across the five authorities, which is likely to reflect the different nature of the authorities. For example, South Staffordshire has no recognised towns or urban centre, being more rural and therefore is likely to have less brownfield land available for regeneration.

Table 12. Brownfield capacity for Staffordshire authorities

Local Authority	Existing number of dwellings (2024)[51]	Brownfield land supply (minimum net dwellings)[52]	Brownfield land capacity as a % of the existing number of dwellings
Cannock Chase District Council	46,087	3,148	7%
Lichfield District Council	49,230	5,359	11%

[51] This has been sourced from Table 125: dwelling stock estimates by local authority district, using the 2024 unrounded figure. Available at: www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants The 2024 figure was used to stay consistent with the latest available Brownfield Land Register.

[52] These have been sourced from the authorities' Brownfield Land Registers, all updated in 2024. Available at:

Cannock Chase District Council: https://www.cannockchasedc.gov.uk/residents/planning-and-building-control/planning-policy/planning-policy-monitoring

Lichfield District Council: https://www.lichfielddc.gov.uk/evidence-base/brownfield-land-register

South Staffordshire Council: https://www.sstaffs.gov.uk/planning/planning-policy-and-local-plans/brownfield-land-register-dataset

Stafford Borough Council: https://www.staffordbc.gov.uk/brownfield-land-register

Tamworth Borough Council: https://tamsmc.tamworth.gov.uk/planning-policy/brownfield-land-register

Local Authority	Existing number of dwellings (2024)[51]	Brownfield land supply (minimum net dwellings)[52]	Brownfield land capacity as a % of the existing number of dwellings
South Staffordshire Council	49,405	434	Less than 1%
Stafford Borough Council	64,171	1,086	2%
Tamworth Borough Council	34,934	435	1%
Staffordshire authorities Total	**243,827**	**10,462**	**4%**

A review has also been carried out on the percentage of new dwellings on Green Belt land across the authorities to understand how the Green Belt is performing on Purpose E, set out in Table 13. This is considered directly relevant to how the Green Belt is performing on Purpose E. This dataset, which is collated by MHCLG, covers the years between 2015 and 2022, and takes three-year averages to minimise outlier figures.

Table 13. Percentage of new dwellings on Green Belt land in Staffordshire authorities, Birmingham, the Black Country authorities and the England average per year from 2015-2022[53]

Geography (proportion of land area designated as Green Belt in 2022)	2015	2016	2017	2018	2019	2020	2021	2022	Average
Cannock Chase (61.2% Green Belt)	1.1	8.8	6.8	10.0	3.2	3.9	3.8	2.0	5.0
Lichfield (45.8% Green Belt)	11.3	13.3	11.9	6.0	4.7	4.3	4.3	5.0	7.6
South Staffordshire (78.9% Green Belt)	45.6	45.3	41.1	17	15.7	6.9	11.2	8.6	23.9
Stafford (18.6% Green Belt)	9.1	8.3	7.8	6.0	5.3	3.8	2.4	2	5.6
Tamworth (6.8% Green Belt)	0.6	0.2	4.5	0	0	0	0	0	0.6
Staffordshire Authorities Average (42.3% Green Belt)	**13.5**	**15.2**	**14.4**	**7.8**	**5.8**	**3.8**	**4.3**	**3.5**	**8.5**
Birmingham (13.9% Green Belt)	0.1	0	0	0	0.1	0.1	0	0.1	0.05
Black Country (19.5% Green Belt)	0.8	1	1.7	1	0.6	0.5	1.7	1.4	1.1
England Green Belt Authorities (12% Green Belt)	**2.9**	**2.3**	**2.6**	**2.8**	**2.5**	**2.8**	**2.3**	**2.5**	**2.6**

The average percentage of new dwellings on Green Belt land for each of the five Staffordshire authorities varies, with an overall average of 8.5%. This exceeds the England Green Belt Authority average of 2.6% and also exceeds that of the neighbouring Birmingham and Black Country Authorities (0.05% and 1.1% respectively). However, it is important to note that this is likely due to the proportion of land designated as

[53] Taken from the yearly data from Land Use Change Statistics residential address based change tables (table P311) published on https://www.gov.uk/government/collections/land-use-change-statistics

Green Belt (as of 2022)[54] in these authorities being significant higher with an average of 42.3%, compared to the England average of 12%, Birmingham of 13.9% and Black Country authorities average of 19.5%.

Table 13 shows that South Staffordshire has the highest average percentage of new dwellings on Green Belt land, with this peaking between 2015-2017. This also supports the position that they have the lowest brownfield land capacity as a percentage of the existing number of dwellings. Whereas, by contrast, Tamworth has a lower average, which is in part likely due to the smaller authority area with limited Green Belt. It should also be noted that Stafford contains two areas of Green Belt, the West Midlands Green Belt and the North Staffordshire Green Belt, meaning their figures will be across both of these areas.

It is clear, therefore, that a number of contextual factors, including national policy on general development (the 'tilted balance'), as well as spatial and other authority-specific factors, impacted on the performance of Purpose E to a greater extent, in many cases, than national Green Belt policy. While this analysis covers these five authorities alone, such factors would likely have applied to greater or lesser extents in other Green Belt authorities in England.

To apply a score for Purpose E in as robust a way as possible, it therefore seems logical not to assign a score by individual authority (noting this would also potentially create complications through the assessment of cross-boundary parcels) as this would accord too much weight to authority-specific policy, spatial, and possibly other factors. It is more reasonable to assign the same score for the whole of the Green Belt in the study area, which also helps smooth out the impacts of any authority-specific factors. Assigning a single score to the whole area also reflects the role the Green Belt plays as part of the wider West Midlands Green Belt and that four of the five authorities are within the Greater Birmingham and Black Country Housing Market Area. This means, for example, that pressure for development in one authority could be and likely often is displaced into the Green Belt of its neighbouring authority (both across the authorities within this study and those adjacent).

Applying the Cheshire East Purpose E assessment thresholds as shown in Table 11, although each of the authorities could be considered to make a different contribution, based on the total combined figures for the five authorities, which is 4%, results in the contribution being deemed as moderate.

Furthermore, as a whole the average percentage of new dwellings on Green Belt land across the Staffordshire authorities is around three times higher than the England average, and significantly higher than Birmingham and the Black Country authorities. This suggests the Green Belt is playing a reasonable role in encouraging the recycling of derelict and other urban land.

Given there is no single correct method to assessing Purpose E, this approach provides a high-level view on the role of the Green Belt in encouraging the recycling of derelict and other urban land. It provides a theoretical assessment of the potential for urban regeneration and there is no guarantee that restricting development on Green Belt land will result in the development of brownfield sites. The data sets used to determine thresholds are considered appropriate to the Green Belt across this region of Staffordshire. Overall, it is considered to represent a proportionate and reasonable approach to Purpose E based on available data.

All parcels and broad areas should be assessed as making a **'moderate contribution'** to Purpose E.

Overall Assessment

The overall assessment considered the outcomes of each of the five purposes and then makes a judgement on the overall contribution the parcel makes to the Green Belt. The same qualitative rating system as applied to each of the five purposes will be applied to the overall assessment (i.e. Strong, Moderate, Weak or No contribution). In order to ensure a consistent and transparent approach, guidance has been set out in Appendix B that will be used in determining the overall assessment.

Whilst all five Green Belt purposes should be given equal weighting, the overall assessment is not intended to be a number balancing exercise, and a certain level of professional judgement must be applied to the guidance set out above and particularly where one of the purposes is assessed as 'strong'. In order to do this,

[54] Taken from the 2021-2022 data from Land Use Change Statistics residential address based change tables (table P311) published on https://www.gov.uk/government/collections/land-use-change-statistics

it is necessary to refer back to the overall aim and purpose of Green Belt as set out in paragraph 142 of the NPPF "*The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and permanence*."

The aims of paragraph 142 are fundamentally subsumed within Purposes A, B and C and thus where the development of a parcel would particularly threaten these purposes, this is a relevant consideration as part of the application of professional judgement by the assessor. The justification for the assessment should provide a transparent explanation behind the assessor's reasoning.

4.2.3 Step 2b: Identification of potential grey belt

The outcome of the purpose assessment will be used as the basis for establishing which parcels may have grey belt potential[55], alongside the application of footnote 7 constraints. For the assessment of broad areas, consideration was given to their scale and if it was suitable or appropriate for them to be assessed for potential grey belt[56]. Table 14 and Figure 10, shows the relevant footnote 7 constraints that have been considered as part of the assessment of the parcels/broad areas. Note, only footnote 7 constraints which fall within the assessment area boundary are being considered.

To note, the NPPF does not define 'habitats sites', but all habitat constraints listed in other sections of the PPG have been listed in Table 14. Footnote 7 also makes reference to paragraph 194 of the NPPF, which indicates that potential and proposed habitats sites of the types listed should be treated as having the same protection as those that have already been confirmed. Additionally, Footnote 7 itself does not indicate specific heritage assets, but listed in Table 14 are all constraints listed in the glossary to the NPPF as being within the definition of 'designated heritage assets'.

Table 14. List of Footnote 7 constraints and the extent to which they are considered relevant to the Staffordshire Green Belt Assessment

Footnote 7 constraint	Relevance to the Green Belt in Staffordshire
Special Areas of Conservation (SAC)	**Considered relevant –** there are some areas of existing or proposed SACs within or close to the study area, notably the Cannock Chase SAC[57].
Special Protection Areas (SPA)	**Not relevant –** there are no existing or proposed SPAs within or close to the study area.
Ramsar Sites	**Not relevant –** there are no existing or proposed Ramsar Sites within or close to the study area.
Sites required as compensatory measures for adverse effects on a SAC, SPA or Ramsar Site	**Not relevant –** no sites required as compensatory measures that fall within the Staffordshire area of the West Midlands Green Belt have been identified.
Sites of Special Scientific Interest (SSSI)	**Considered relevant –** there are a number of SSSIs throughout the study area – several are within or in close proximity to the Green Belt.
Irreplaceable habitat[58]	**Considered relevant –** whilst there is no blanket bog, limestone pavement, sand dunes, salt marsh or lowland fen within or close to the study area, there

[55] At the parcel scale, grey belt potential is identified to avoid suggesting that an entire parcel *is* Grey Belt without a sufficiently granular level of assessment. This would be confirmed once land for release from the Green Belt is identified.

[56] See Section 3.4 which notes the following from recent appeals *"when considering the identification of grey belt in decision making, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site*."

[57] We note there is a 15km Zone of Influence around Cannock Chase SAC, however this is not considered an additional constraint beyond the land already covered by the SAC.

[58] The glossary to the NPPF defines 'irreplaceable habitats' as habitats which would be technically very difficult to restore, recreate or replace, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

Footnote 7 constraint	Relevance to the Green Belt in Staffordshire
	are a number of ancient woodlands – several are within or in close proximity to the Green Belt.
Local Green Space	**Considered relevant –** A number of Neighbourhood Plans include Local Green Space, although only the Shenstone, Kinver and Whittington & Fisherwick 'made' Neighbourhood Plans include Local Green Space in close proximity to the Green Belt. No adopted Local Plans included Local Green Space.
National Landscape (previously known as Areas of Outstanding Natural Beauty)	**Considered relevant** – Cannock Chase National Landscape is located within the study area.
National Park	**Not relevant –** there are no national parks within or close to the study area.
Heritage Coast	**Not relevant –** there are no heritage coasts within or close to the study area.
World Heritage Sites	**Not relevant –** there are no World Heritage Sites within or close to the study area.
Scheduled Monuments	**Considered relevant –** there are a number of Scheduled Monuments throughout the study area, several are within or in close proximity to the Green Belt.
Statutory Listed Buildings	**This is not considered a relevant constraint at a parcel/broad area scale –** there are a large number of listed buildings throughout the study area, including within or in close proximity to the Green Belt. However, at a parcel/broad area scale, it is not considered that the presence of individual listed buildings would be an inherently strong reason for restricting development, as development could be designed around them accordingly – and where larger clusters of listed buildings exist within a parcel/broad area, that cluster is likely to also be designated as a Conservation Area. Although it would be relevant at a site scale in Stage 2 or as part of the Development Management process.
Protected Wreck Sites	**Not relevant –** there are no protected wreck sites within or close to the study area.
Registered Parks and Gardens (RPG)	**Considered relevant -** there are a number of Registered Parks and Gardens within or in close proximity to the Green Belt.
Registered Battlefield	**Not relevant –** there are no Registered Battlefields within or close to the study area.
Conservation Areas	**Considered relevant –** there are a number of Conservation Areas throughout the study area – several are within or in close proximity to the Green Belt.
Non-designated heritage assets of archaeological interest demonstrably of equivalent significance to Scheduled Monuments[59]	**Not relevant –** Given the wide geographical spread of areas of potential archaeology interest, and the typical requirement for more detailed specialist assessment in order to establish the degree of significance, it is considered that the GBA would be a disproportionate way to consider significance – this should therefore be considered on a case-by-case basis for any individual

[59] Footnote 7 makes reference to "other heritage assets of archaeological interest referred to in footnote 75. Footnote 75 lists *"non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."*

Footnote 7 constraint	Relevance to the Green Belt in Staffordshire
	sites subject to release from the Green Belt or as part of the Development Management process.
Areas at risk of flooding or coastal change	**Considered relevant –** there are a number of areas in Flood Zones 2 and 3 and at risk of surface water flooding within the Green Belt.

Any parcel or broad area (of a suitable size for assessment) which scored strongly against either Purpose A, Purpose B or Purpose D does not have grey belt potential in accordance with national policy. Parcels/broad areas having a moderate, weak or no contribution to all three of these purposes require further assessment in order to establish their grey belt potential.

A1

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Study area
Local authority boundaries
West Midlands Green Belt
HS2 Route

Footnote 7 constraints

Ancient Woodland
Conservation Areas
Local Green Space
Flood Zone 2
Flood Zone 3
Historic Parks and Gardens
National Landscape Areas
Scheduled Ancient Monument
Sites of Special Scientific Interest
Special Areas of Conservation

Coordinate System: British National Grid

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Metres
0 2,000 4,000 8,000

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Client
Staffordshire authorities

Project Name
Staffordshire Green Belt Assessment

Drawing Title
Figure 10. Relevant footnote 7 constraints across the West Midlands Green Belt in Staffordshire

Scale at A1
1:74,000

Role
Planning

Suitability
Final

Project Number
313903-00

Rev
P01

Drawing Number
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5. Green Belt Assessment outcomes

5.1 Overview

This section details the findings of the GBA, including specific considerations relating to the desktop assessment and site visits, and approaches taken whilst carrying out the assessment. It includes a summary of the assessment findings and is accompanied by choropleth maps for each purpose, overall assessment, and grey belt.

In total, 286 Green Belt parcels and 16 broad areas were assessed. The choropleth maps are included in Appendix D and there is an individual appendix for each LPA which includes the authority specific assessment findings, a summary table, choropleth maps and the individual assessment proformas.

5.2 Desktop assessment and site visits

Following the completion of the desktop assessment for each parcel and broad area, site visits were undertaken in February and March 2026 to verify the findings. The purpose of the visits was to sense check the parcel boundaries, confirm the degree of openness, and validate key observations informing the assessment against the Green Belt purposes.

Site visits were undertaken for all parcels. Assessors exercised professional judgement when determining which parts of a parcel to access, based on publicly accessible locations that would provide the most representative views and best understanding of the parcel's relationship with surrounding development and countryside. Full coverage of every part of a parcel was not required. In a small number of cases, access constraints (e.g. private land with no public right of way or viewpoints only available from the highway) limited on-site observations. In these cases, a combination of available vantage points and detailed desktop review was used. All parcels were accessible to some extent, even if only one boundary could be accessed.

Due to their generally significantly larger scale and, in many cases, lack of safe or meaningful points of access, broad areas were not subject to site visits. Broad areas were instead assessed on a desktop basis using aerial imagery, OS MasterMap, topographic data and GIS layers. The broad areas remain a strategic scale of assessment, and this approach reflects both proportionate evidence-gathering and established practice in other GBAs.

5.3 Approach to assessment

The assessment was conducted as set out in the methodology in Section 4. However, throughout the course of the assessment certain nuances or aspects needed to be clarified. This section therefore provides a brief overview of how these matters were addressed.

5.3.1 Approach to cross-boundary assessment areas

As set out in the methodology in Section 4, parcels were defined around the main urban areas, the smaller towns and inset villages (with the exception of some of the smaller villages in South Staffordshire). Following the definition of parcels, the remaining Green Belt areas were divided into broad areas with the most defensible boundaries used to split these. Parcels and broad areas were defined across the five authorities' boundaries within the study area where appropriate. This approach has resulted in 13 cross-boundary parcels which sit across two authority areas and four broad areas which sit across at least two authority areas.

As development of the cross-boundary parcels/broad areas could impact on each LPA area, it was considered appropriate to factor these in the LPA specific assessment findings and provide the relevant assessment forms in each LPA appendix where required.

Table 15 below shows the number of parcels solely within each authority area as well as the number of cross-boundary parcels. Similarly, Table 16 shows this in respect of the broad areas.

Table 15. Cross-boundary parcels by Local Authority

Local Planning Authority	Parcels solely within authority area	Cross-boundary parcels	Total number of parcels
Cannock Chase	23	13	36
Lichfield District	94	9	103
Stafford Borough	3	-	3
South Staffordshire	151	4	155
Tamworth	2	1	3

Table 16. Cross-boundary broad areas by Local Authority

Local Planning Authority	Broad areas solely within authority area	Cross-boundary broad areas	Total number of broad areas
Cannock Chase	-	3	3
Lichfield District	4	1	5
Stafford Borough	-	2	2
South Staffordshire	8	3	11
Tamworth	-	-	-

5.3.2 Coding of parcels and broad areas

Due to the scale of the study area and number of parcels, the decision was made that when coding the parcels, the adjacent large built up area, town, village or inset development would be used as a three-letter prefix before a numerical value. For example, all parcels around Lichfield City start with the prefix 'LIC' with these then numbered from 1-16 (e.g. LIC01, LIC02, etc.).

There are instances where parcels sit between multiple large built up areas, towns, villages or inset developments. Therefore, in these cases, the parcel has been coded using the name of the development which the majority of the boundary is adjacent to. For example, CAN02 spans the gap between both Cannock and Burntwood (noting this is also a cross-boundary parcel), however the majority of the boundary is adjacent to the Cannock large built up area.

The coding system used does not consider the authority area and therefore best represents the nearby settlement. This allows for more of a detailed spatial analysis of the assessment outcomes as a whole across the study area. For example, the parcels around the Cannock, Cheslyn Hay, Great Wyrley, Hednesford and Huntington span three authority areas (Cannock Chase, Lichfield and South Staffordshire), coded CAN01-CAN35. If LPA specific coding had been used, it may not have allowed for this level of analysis to be fully appreciated to understand how the assessments impacts on settlements in the study area.

There are a number of parcels that are adjacent or near to the West Midlands conurbation. To reflect that the conurbation is being considered one 'town', these have all been coded the same with the prefix 'WMC'.

For the broad areas, these used 'BA' as prefix followed by a numerical value (e.g. BA01, BA02 etc.).

5.3.3 Approach to broad area assessments

Broad areas were assessed against the same detailed purpose criteria as parcels, recognising that contributions can vary internally but that a strategic, whole-area judgement is required. For example, under Purpose B (preventing neighbouring towns from merging), the assessment for broad areas considers their position relative to settlement gaps at a strategic scale. In the specific case of BA01, although the broad area spans a wide landscape, only a small section of its southern extent lies within the strategic gap between the West Midlands conurbation and Kidderminster. Development in this part of the broad area would erode the

perceived and actual separation between these towns, however, BA01 scores weakly against Purpose B to reflect that much of the wider area is not within this gap. This approach reflects the need for broad area assessments to identify strategic contributions even where only specific parts of the area perform a particular Green Belt function.

5.3.4 Approach to Purpose A – incongruous assessment

As introduced through the PPG (2025) part of the Purpose A assessment now requires consideration of whether development of an assessment would result in an incongruous pattern of development and if so, the assessment area should be deemed to make a strong contribution to this purpose. The only example given within the PPG as to how this could be interpreted is in reference to 'an extended "finger" of development into the Green Belt. To establish the approach to this specific part of the Purpose A assessment a number of recent appeal decisions have been reviewed (focussing on site specific applications), however, it is noted there are varying approaches applied by different Inspectors and in one case the Secretary of State. Furthermore, no GBAs has been examined as part of the Local Plan review since this aspect has been introduced to confirm an approach being taken by Local Plan Inspectors.

In this GBA, the following approach was followed:

- First, the connection to the large built up area was considered, if there was a very limited connection (likely considered near to rather than adjacent in the assessment wording) the parcel in most instances was deemed to be incongruous irrespective of the parcel's boundaries or shape/scale.
- Next, the parcel's boundary between itself and the wider Green Belt was considered. If this was less defensible, the parcel lacks physical features that could restrict sprawl and therefore it was considered that this could result in an incongruous pattern of development. However, if the parcel was largely enclosed by the large built up area, and therefore development could be seen as infill or rounding off the existing settlement pattern this didn't apply.
- Following this, if the boundary was defensible, the parcel's size/scale and shape was considered compared to the existing extent or settlement form of the large built up area. If development of the parcel was considered inconsistent or disproportionate, the parcel was assessed as resulting in an incongruous pattern of development and therefore made a strong contribution to Purpose A.

In addition to the above approach, in cases where development of a parcel would result in smaller standalone inset settlement becoming connected or absorbed into the large built up area, this was also considered to result in an incongruous pattern of development that is inconsistent with the existing settlement pattern, and therefore makes a strong contribution to Purpose A.

This was the general high-level approach that was followed, however, throughout the assessment there was a variety of specific aspects to be considered for each parcel. The text within each assessment form provides further clarity on how the contribution was established.

5.3.5 Approach to identifying potential grey belt

Given the notional nature and generally larger size of parcels being assessed, conclusions made reference to whether or not parcels have grey belt 'potential'. This reflects the reality that a more specific assessment of whether or not land is grey belt needs to be based on the actual boundary of a development site, and that at this stage it is not possible to consider whether sites within that parcel might be grey belt.

For those parcels where consideration was given to identifying them as potential grey belt (i.e. not contributing strongly to Purposes A, B or D), the assessment relied on the desktop review and the available GIS information[60]. Professional judgement was applied in situations where footnote 7 constraints covered a portion of a site and could limit development e.g. Flood Zone 2/3. In these cases, only parts of the parcel are

[60] This is based on the information provided by each of the authorities for the data sets identified in Table 13, specifically Conservation Areas and Local Green Space, as well as sourcing data from the national datasets published by the Environmental Agency, Historic England, and Natural England. A national data set was used to provide information on risk of surface water flooding - Risk of flooding from surface water – understanding and using the map - GOV.UK, this mapping shows flooding that is likely to occur as a result of rainfall with a 3.3% (1 in 30 year), 1% (1 in 100 year) and 0.1% (1 in 1000 year) chance of happening in any given year. As such the surface water data in not shown on the individual assessment maps or Figure 10. All data was accessed March 2026.

likely to be potential grey belt and have been acknowledged as "Yes (footnote 7 constraints)". The majority of parcels have some limited areas at risk of surface water flooding, and therefore, if these covered less than 10% of the parcel's total area, these were acknowledged within the assessment text, but that parcel was considered as "Yes" in terms of its grey belt potential (on the basis that this constraint at this extent is likely to be able to be mitigated as part of development schemes). As a provisional assessment, only where footnote 7 constraints covered the majority or all of a parcel, would it be ruled out as being potential grey belt. A small number of parcels had a constraint which covered in excess of 80% of the parcel's area, and therefore, these were ruled out as being potential grey belt, and were categorised as "No (footnote 7 constraints)". This allowed for a clear distinction between those ruled out based on the outcome of the purposes assessment and those based on the presence of a footnote 7 constraint.

For broad areas, their scale meant it was not generally appropriate or meaningful to assess grey belt potential. Their performance against Purposes A, B and D and the presence of footnote 7 constraints has nevertheless been recorded on the proforma. In a small number of cases where a broad area was of a comparable scale to a parcel, grey belt potential has been assessed.

5.4 Study wide assessment outcomes

The following section details high-level conclusions and observations for the assessment outcomes taking a study wide focus. The assessment outcomes are also supported by LPA specific conclusions which are provided in their own standalone appendices.

5.4.1 Parcel assessments

In total, 286 parcels were defined across the study area to cover Green Belt next to the large built up area and other inset areas for assessment (see parcel references on Figure 5 in Section 4).

Overall, of the 286 parcels assessed:

- 80 were assessed as making a strong overall contribution to Green Belt purposes;
- 167 were assessed as making a moderate overall contribution to Green Belt purposes;
- 39 were assessed as making a weak overall contribution to Green Belt purposes;
- None were assessed as making no overall contribution to Green Belt purposes;
- 178 were identified as potential grey belt.

As explained in Section 5.3.2 above, the parcels were coded based on the large built up area, town, village or inset development that they were adjacent to (or the majority was adjacent to). Table 17 below shows details of the number of parcels by location that made a strong, moderate or weak contribution to the overall assessment and how many potential grey belt parcels were also present. Generally, the parcels are grouped solely on their location codes, e.g. the ARM were all located around Armitage. However, in some cases parcels are closely clustered near to multiple settlements and therefore these have been grouped where appropriate in the table below. For the parcels adjacent to the West Midlands conurbation (codes WMC01-WMC44), to aid the spatial analysis, these have been split accordingly to which neighbouring authority they are closest to, either Walsall, Wolverhampton or Dudley.

Table 17. Number of parcels that make a strong, moderate or weak contribution to the overall assessment grouped based on parcel coding

Large built up area / town / village / settlement	Local Planning Authority	No. of parcels	Overall assessment – no. of parcels that make a Strong, Moderate or Weak contribution	No. of potential grey belt parcels
Armitage	Lichfield	6	5 Moderate, 1 Weak	Yes – all
Bilbrook/Codsall	South Staffordshire	11	4 Strong, 7 Moderate	Yes – 6
Bishop's Wood	South Staffordshire	4	4 Moderate	Yes – all

Large built up area / town / village / settlement	Local Planning Authority	No. of parcels	Overall assessment – no. of parcels that make a Strong, Moderate or Weak contribution	No. of potential grey belt parcels
Bobbington	South Staffordshire	4	4 Moderate	Yes – all
Brewood	South Staffordshire	6	6 Moderate	Yes – all
Brocton	Stafford Borough	2	2 Moderate	Yes – all
Burntwood and Hammerwich	Lichfield / Cannock Chase	19	8 Strong, 10 Moderate, 1 Weak	Yes – 9
Cannock (including Cheslyn Hay, Great Wyrley, Hednesford and Huntington)	Cannock Chase / Lichfield / South Staffordshire	35	17 Strong, 13 Moderate, 5 Weak	Yes – 13
Cannock Wood and Prospect Village	Cannock Chase / Lichfield	7	2 Moderate, 5 Weak	Yes – 2
Coven	South Staffordshire	5	4 Moderate, 1 Weak	Yes – all
Drayton Bassett	Lichfield	4	3 Moderate, 1 Weak	Yes – all
Featherstone	South Staffordshire	5	3 Moderate, 2 Weak	Yes – all
Four Ashes	South Staffordshire	3	1 Moderate, 2 Weak	Yes – all
Hopwas	Lichfield	4	3 Moderate, 1 Weak	Yes – 3
Kinver	South Staffordshire	11	10 Moderate, 1 Weak	Yes – all
Little Aston	Lichfield	6	3 Strong, 1 Moderate, 2 Weak	Yes – 2
Lichfield City	Lichfield	16	11 Strong, 3 Moderate, 2 Weak	Yes – 3
Longdon	Lichfield	5	4 Moderate, 1 Weak	Yes – all
Norton Canes	Cannock Chase / Lichfield	5	1 Strong, 2 Moderate, 2 Weak	Yes – 3
Pattingham	South Staffordshire	7	7 Moderate	Yes – all
Penkridge	South Staffordshire	6	6 Moderate	Yes – all
Perton	South Staffordshire	1	1 Moderate	Yes
Rugeley (including Brereton)	Cannock Chase / Lichfield / Stafford Borough	12	7 Strong, 4 Moderate, 1 Weak	Yes – 3

Large built up area / town / village / settlement	Local Planning Authority	No. of parcels	Overall assessment – no. of parcels that make a Strong, Moderate or Weak contribution	No. of potential grey belt parcels
Seisdon and Trysull	South Staffordshire	7	5 Moderate, 2 Weak	Yes – all
Shareshill	South Staffordshire	4	4 Moderate	Yes – all
Shenstone	Lichfield	8	8 Moderate	Yes – all
Stonnall	Lichfield	6	1 Strong, 5 Moderate	Yes – 5
Tamworth (including Fazeley and Mile Oak)	Tamworth / Lichfield	10	3 Strong, 5 Moderate, 2 Weak	Yes – 7
Upper Longdon	Lichfield	4	4 Moderate	Yes – 3
Whittington	Lichfield	6	4 Moderate, 2 Weak	Yes – all
West Midlands conurbation – Walsall[61]	Lichfield / South Staffordshire	9	4 Strong, 5 Moderate	Yes – 3
West Midlands conurbation – Wolverhampton[62]	South Staffordshire	20	9 Strong, 10 Moderate, 1 Weak	Yes – 6
West Midlands conurbation – Dudley[63]	South Staffordshire	15	12 Strong, 3 Moderate	Yes – 3
Wombourne, Swindon and Himley	South Staffordshire	13	9 Moderate, 4 Weak	Yes – all

A number of conclusions can be drawn from the assessments set out in Table 17 (above) and study wide assessment maps in Appendix D:

Overall assessment

- 85% of the assessments made either a strong or moderate overall contribution to the Green Belt assessment purposes, with those making a weak contribution generally as a result of having some existing development, undergoing development or having a land use which significantly impacts on the parcel's openness e.g. a landfill.
- Of those that make a strong and moderate contribution, there is an east-west divide across the study area, with more strong contributions being recorded in the eastern section of the study area from the western edge of Cannock onwards (which coincides with the eastern edge of South Staffordshire's administrative area). To make a strong overall contribution, a parcel needed to make at least a strong contribution to two of the purposes (with a strong contribution to Purpose C largely a common feature throughout). In the eastern section of the study area, there are more large built up areas with

[61] Parcel codes for those adjacent to Walsall's administrative area: WMC01-WMC08 and WMC44

[62] Parcel codes for those adjacent to Wolverhampton's administrative area: WMC09-WMC27 and WMC43

[63] Parcel codes for those adjacent to Dudley's administrative area: WMC28-WMC42

parcels being adjacent or near to these for the Purpose A assessment, as well as a larger number of towns and generally smaller gaps between these for the Purpose B assessment. Whereas, in the western section, only those parcels that were adjacent or near to the West Midlands conurbation could act in regard of Purpose A, and for Purpose B, there are no further standalone towns within South Staffordshire meaning that many parcels did not make a contribution or only a weak contribution to this purpose. This therefore results in the majority of parcels in the western section of the study area only making a moderate contribution to the overall assessment.

- Table 17 above shows there were particular settlements that had clusters of strong contributions. Those of note include Burntwood, Cannock, Lichfield City and Rugeley. All of these are large built up areas where parcels could act to prevent unrestricted sprawl under Purpose A, as well as make a contribution to Purpose B given the spatial closeness of these towns, and contributing to Purpose C. Furthermore, in the case of parcels around Lichfield City and Rugeley, some parcels also made a contribution to Purpose D.

- Additionally, the strongly performing parcels around Cannock and Rugeley highlight how constrained Cannock Chase's authority area is in terms of Green Belt, before considering any other policy constraints such as the Cannock Chase National Landscape.

- Tamworth's authority area had significantly less Green Belt than any of the other authorities due to Tamworth's relationship with the West Midlands Green Belt, with the majority of the town being outside of the Green Belt. However, there are a number of parcels that also lie within Lichfield's authority area. Tamworth itself has been defined as a large built up area which includes the continuous inset development associated with Fazeley and Mile Oak (in Lichfield's authority area), therefore, any adjacent or nearby parcels could act to prevent unrestricted sprawl under Purpose A, as well as make a contribution to Purpose B and Purpose C.

- Many of the villages only had parcels that could make a moderate overall contribution at best, as they could not contribute to Purpose A, are largely located in reasonable size gaps for Purpose B, generally make a strong contribution for Purpose C, and then no contribution to Purpose D. Therefore, Purpose C was largely the only differentiating factor. This again reinforces the east-west divide across the study area.

Purpose A

- Just over half of all of the parcels (147 parcels) made a contribution to Purpose A. Of these, there were 91 strong contributions, 42 moderate contributions and 14 weak contributions.

- The high number of strong contributions is as a result of the parcels being deemed to result in an incongruous pattern of development if they were developed. This is due to either the boundary between the parcel and wider Green Belt (sometimes called the outer boundary) being less defensible and therefore unable to act to restrict sprawl, or the size/shape of the parcel was deemed inconsistent or disproportionate with the existing settlement pattern of the large built up area. In terms of the size/shape of the parcels, this was as a result of how the parcels were defined from the outset (as per the methodology in Section 4) and therefore different conclusions could be drawn if parcels were defined differently.

- There is a notable cluster of strongly contributing parcels around the Cannock, Cheslyn Hay, Great Wyrley, Hednesford and Huntington large built up area. The existing shape of the large built up area, combined with how the parcels have been defined, means that in most cases the parcels may not be seen as a logical extension to the existing settlement form and therefore could result in an incongruous pattern of development. There are similar clusters around Lichfield City and Rugeley where the same conclusions can be drawn.

- Within the eastern section of the study area, Tamworth was also identified as a large built up area. However, there is not as notable a cluster of strongly contributing parcels for Purpose A as with the other large built up areas in this section. The parcels in this area are within Tamworth's and Lichfield's authority areas, with Tamworth LPA only having a limited amount of Green Belt. The majority of the town of Tamworth is outside the West Midlands Green Belt, and this placement means there is only a small extent of the town that is inset and the Green Belt parcels therefore don't

form a contiguous ring around the large built up area. Only three of the 10 parcels around Tamworth (TAM01-TAM10) made a strong contribution, reflecting either a lack of defensible boundaries, a limited connection to the large built up area or being inconsistent with the existing settlement pattern and therefore potentially resulting in an incongruous pattern of development. Those within Tamworth's administrative authority themselves all made a moderate contribution.

- As with the overall assessment, there is generally an east-west divide across the study area, with more than half of the parcels in South Staffordshire's administrative area making no contribution to Purpose A. Those that make a strong contribution to Purpose A in South Staffordshire are generally the parcels focussed along the urban edge of the West Midlands Conurbation.

Purpose B

- Of all of the parcels, 228 parcels made a contribution to Purpose B. Of these, there were 13 strong contributions, 30 moderate contributions and 185 weak contributions.
- The overall majority of parcels made a weak contribution to Purpose B and, whilst this highlights that most parcels lie within a gap between neighbouring towns, these gaps are of sufficient scale that if the parcel was developed, this would not have any impact on the visual, physical or perceived separation between the towns. Within these gaps there are a number of broad areas which do make a strong contribution to Purpose B (see Section 5.4.2).
- The towns included as part of the assessment were those within the study area, as well as any towns in neighbouring authorities or outside of the Green Belt (in the case of Stafford). The parcels were then assessed for the gap between towns they were located in. The gap between towns outside of the study area are generally of a more significant scale, and therefore any parcel within one of these gaps could only make a weak contribution at most (regardless of its scale). For example, there is a corridor of parcels between Stafford and the West Midlands conurbation, and whilst these lie within the gap, the scale of the gap means that these parcels only make a weak contribution.
- At locations where the gaps between the neighbouring towns are narrower, and there isn't a broad area in between, the parcels make a strong contribution. This includes particular clusters of parcels that are strongly performing between Cannock, Burntwood and in part the West Midlands conurbation, as well as between Cannock and the West Midlands conurbation (specifically south of Cheslyn Hay and Great Wyrley). There is also a slightly narrower gap between Burntwood and Lichfield City, however this is a cluster of largely moderately performing parcels.
- The gap between Cannock, Burntwood and in part the West Midlands conurbation, also contains the large inset village of Norton Canes. The physical presence of the village within this gap means that it would itself help to play a role in preventing the merging of these towns. Development southeast from Cannock (which largely relates to parcel CAN03) would result in this town merging with Norton Canes, and this in turn could create the perception that Cannock is therefore closer physically to Burntwood and the conurbation.
- Across South Staffordshire's administrative area, no standalone towns were identified. Therefore, the assessment outcomes illustrated on the Purpose B study wide map shows a stark contrast between parcels making a weak or no contribution of the study area, compared to higher contributions in the eastern section. This against reinforces and helps to explain the difference within the overall assessment.

Purpose C

- Only one parcel out of the 286 made no contribution to Purpose C. Of the 285 parcels making a contribution, 218 parcels (76%) made a strong contribution, 58 parcels made a moderate contribution, and nine parcels made a weak contribution.
- Overwhelmingly, the majority of parcels made a strong contribution to safeguarding the countryside from encroachment. This reflects the largely rural nature across the study area with these parcels all having less than 10% built form of inappropriate development.

- Those that made a moderate contribution contained development that was usually associated with a nearby inset large built up area, settlement or were largely enclosed by surrounding inset development creating a sense of enclosure.
- The parcels which made a weak contribution generally had a significant amount of development within them (e.g. Drayton Manor Theme Park), were undergoing development (e.g. the West Midlands Interchange site or HS2 works), or had a land use that impacted on the Purpose C assessment e.g. a quarry or landfill.
- The one parcel that made no contribution (CAN07) was as a result of it being developed and consisting of extensive, existing development.
- There is no notable difference in contributions to this purpose across the study area.

Purpose D

- Only 10 parcels made a contribution to Purpose D. Of these, there was one strong contribution, two moderate contributions and seven weak contributions.
- Four historic towns were identified within the study area (Cannock, Lichfield City, Rugeley and Tamworth) and one more within Shropshire's administrative area (Albrighton). However, of these towns, only Lichfield City and Rugeley had parcels that made a contribution to Purpose D.
- In respect of Lichfield City, nine parcels made a contribution. LIC12 included Beacon Park which meant that part of the historic core overlapped with this parcel and led to it making a strong contribution. The nearby LIC11 made a moderate contribution, reflecting the visual connection but physical separation to the historic core. The other parcels all made a weak contribution, mainly due to the spires of both Lichfield Cathedral and St Mary's Church (as key assets within the historic core) being seen on the skyline from the parcels.
- In respect of Rugeley, only one parcel made a contribution. The location of Rugeley's historic core is very central within the settlement, and only RUG08 was in close proximity. This parcel extends as a Green Belt finger amongst the built form, and was considered to make a moderate contribution under Purpose D.
- Cannock and Tamworth both had parcels adjacent to them. However, no parcel was deemed to have a visual or physical connection to their historic cores, and therefore none of the Green Belt was considered to act in respect of Purpose D. This reinforces the position taken by Inspectors in some recent appeals (see Appendix A.1.5) that proximity to a historic town alone is not sufficient to establish a Purpose D contribution.
- Albrighton was also identified as a historic town, however no parcels were considered near enough to make a contribution to Purpose D.

Purpose E

- As set out in the methodology (see Section 4) all parcels across the study area were deemed to make a moderate contribution to Purpose E.

Potential grey belt

Following the purposes assessment, all parcels were assessed for their grey belt potential based on their contribution to Purposes A, B or D and the extent of footnote 7 constraints within the parcel (see Table 14). Section 5.3.4 details how the parcels were accordingly categorised.

Of the 286 parcels assessed:

- 55 were identified as being potential grey belt – 'Yes';
- 122 were identified as being potential grey belt, but containing some amount of footnote 7 constraints – 'Yes (footnote 7 constraints)';

- 15 were ruled out from being potential grey belt due to the majority of the parcel being covered by a footnote 7 constraint – 'No (footnote 7 constraints)';
- 94 were ruled out from being potential grey belt due to a strong contribution to Purpose A, B or D (or multiple) – 'No'.

In respect of this, a number of conclusions can be drawn:

- Over half of the parcels (approx. 60%) were identified as having grey belt potential, with the majority of these containing at least one footnote 7 constraint.
- Although, there was a significant number of parcels with grey belt potential across the study area, the majority of parcels around the large built up areas or some of the towns, were not identified as potential grey belt due to making a strong contribution to Purpose A or B, or in some cases both.
- Due to the nature of how grey belt is identified, the parcels around the inset villages across the study area have all largely been identified as potential grey belt. As these parcels are not adjacent or near to a large built up area or historic town, they were assessed as making no contribution to Purpose A or D, and often only made only a weak contribution at best to Purpose B. Therefore, although in most cases they make a strong contribution to Purpose C, this is not factored into the grey belt assessment in line with the NPPF.
- Those that were ruled out from being potential grey belt due to their extent of footnote 7 constraints (generally due to the presence of the Cannock Chase National Landscape, a Conservation Area or Ancient Woodland) would in theory become an automatic 'Yes' if the draft NPPF is adopted as proposed (with the footnote 7 constraints consideration removed from the definition). Similarly, those identified as 'Yes (footnote 7 constraints)' would also become an automatic 'Yes'.

5.4.2 Broad area assessments

In total, 16 broad areas were defined across the study area to cover the areas remaining after identification of the parcels to provide an assessment of all the West Midlands Green Belt within the extent of the Staffordshire authorities (see references on Figure 5 in Section 4). The broad areas differ greatly in scale and size due to the remaining Green Belt that needed to be assessed and the location of the defensible boundaries that were used to define these.

Overall, eight of the broad areas were assessed as making a strong overall contribution to the Green Belt, with the remaining eight assessed as making a moderate overall contribution. Notwithstanding these conclusions, there are some subtle differences when considering the performance of each broad area against individual Green Belt purposes:

- For Purpose A, 13 of the broad areas were assessed as making a moderate contribution due to being considered near to (in conjunction with neighbouring parcels) the large built up area. These broad areas play a role in checking further unrestricted sprawl. The other three broad areas were considered to make no contribution. None of the broad areas could be considered to make a strong contribution to Purpose A as most are not directly adjacent to the large built up areas. BA11 is the exception to this where the broad area has been defined up to the edge of the large built up area as the presence of the Cannock Chase National Landscape meant there were limited boundaries that were appropriate to be used to define parcels. The presence of physical features that could restrict and contain development (see assessment form for further details) means that it was still deemed appropriate for this broad area to make a moderate contribution to Purpose A.
- For Purpose B, eight of the broad areas were assessed as making a strong contribution due to their position between towns in the eastern section of the study area, with these acting to prevent the merging of these neighbouring towns. Four were assessed as making a moderate contribution and four were assessed as making a weak contribution, with these located in the western section of the study area. As with the parcels, all the broad areas lay within a gap between at least two towns, with several lying between multiple (particularly in the eastern section of the study area). The fact that the broad areas in the western section only made a moderate or weak contribution highlights the size of these gaps between the towns, with the towns often being in neighbouring authority areas or outside of the Green Belt in the case of Stafford.

- For Purpose C, all broad areas were assessed as making a strong contribution due to their scale, overall openness, and strong connection to the wider countryside. This includes extensive areas of woodland, agricultural land, and other open countryside including the Cannock Chase National Landscape. Whilst some broad areas contain villages or settlements/hamlets washed over by the Green Belt, quarries, landfills or transport infrastructure, these are typically localised and do not affect openness at a strategic scale.
- For Purpose D, none of the broad areas were assessed to make a contribution as they were not adjacent to a historic town or did not have a relationship with the historic core.
- For Purpose E, as with the parcels, all broad areas were deemed to make a moderate contribution.
- Due to the scale of most of the broad areas, it was not appropriate to come to a conclusion as to whether they would be considered potential grey belt. However, as one broad area was of a similar scale to parcels, it was assessed and considered as potential grey belt, noting it does contain footnote 7 constraints.

6. Next steps

The Staffordshire GBA forms an important part of each Council's evidence base, to be considered alongside other pieces of evidence when selecting the most sustainable locations for growth. The assessment has set out how each parcel and broad area performs against the five purposes of the Green Belt, before determining whether it could be considered potential grey belt or not.

The findings of this report should be followed up with a more granular assessment to assess the performance of discrete, smaller sites within the Green Belt (typically called a Stage 2). This would need to follow a similar assessment approach to this GBA, considering the contribution each site makes to the five Green Belt purposes, and the potential to be identified as grey belt. It should also include a harm assessment which considers the impact on the remaining Green Belt of potentially removing the site, along with any cumulative impacts based on all reasonable site options being released from the Green Belt and account for resultant future Green Belt boundaries where these would necessarily be different to site boundaries in order for them to be more defensible in the long term. This work could be undertaken as a standalone Stage 2 assessment, or the requirements are included within the site selection methodology for the Local Plan. In respect of this, it is recommended that as part of a site-specific assessment, the sites contribution to the Green Belt purposes is assessed alongside considering the potential harm to both the purposes and the function of the wider Green Belt if the site was removed.

For any Local Plans taking sites forward for further consideration with the intention of releasing Green Belt land for development, the Councils will need to apply the new sequential approach to Green Belt release, as set out in paragraph 148 of the NPPF. This requires consideration of previously developed Green Belt land first, followed by grey belt (which is not previously developed), and then other Green Belt locations, and at all stages taking into account the need to promote sustainable patterns of development. Further work would be needed to build on this GBA, including identification of previously developed land and confirmation of grey belt status.

Where the Local Plan identifies any Green Belt land for release, the Council will need to develop an 'exceptional circumstances' case to justify altering Green Belt boundaries. In developing the exceptional circumstances case it will be necessary to demonstrate that all other reasonable options for meeting identified development needs have been fully examined, in accordance with paragraph 146 of the NPPF. The Council will also need to demonstrate that their strategy makes as much use as possible of suitable brownfield sites and underutilised land, optimises the density of development, and has been informed by discussions with neighbouring authorities (particularly around any unmet development needs). The exceptional circumstances case should also consider the impact on sustainable patterns of development if Green Belt boundaries were not altered.

As part of the exceptional circumstances case, consideration is now required of whether the release of Green Belt land *"…would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan."* (NPPF, paragraph 146). The PPG sets out that when coming to this judgement, authorities should consider "*…whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way*" (Green Belt PPG, paragraph 008). Whilst this can only take place when a Council has identified which land would be released from the Green Belt, a first step could be undertaken to identify areas of fundamental importance to the Green Belt.

The performance of the Green Belt against the purposes should be considered as part of selecting land to be released from the Green Belt and applying the 'fundamentally undermine' test once the scale, design and location for future planned development is known. This will need to consider the Green Belt purposes taken together and how the release would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way. In addition, and as ascertained from a review of recent planning appeals (see Section 3.4), the proportional loss of Green Belt should also be considered in relation to the totality of the Green Belt within a local authority. The smaller the proportional loss, the less likely that loss would fundamentally undermine the purposes (taken together) of the remaining Green Belt. If the sites proposed for released are known when undertaking a Stage 2 assessment, an

assessment on whether the release of these would fundamentally undermine the Green Belt could be conducted at this stage. Alternatively, this should be done as part of the exceptional circumstances case.

This study has identified both parcels and broad areas that could be considered potential grey belt at this stage, assessing whether the parcel performs strongly against Purposes A, B or D and contains any relevant footnote 7 constraints which may impact on the development potential. Parcels and broad areas that contained no or limited extent of footnote 7 constraints and did not perform strongly against Purposes A, B and D, have been considered potential grey belt at this stage. The assessment considered the land within the parcel/broad area boundary; therefore, any potential adjacent footnote 7 constraints would need to also be assessed to consider any wider impact on the development potential of the land within the Green Belt e.g. Impact Risk Zones for SSSI or the setting of Listed Buildings.

It should be noted that parcels/broad areas were assessed as if the full area was developed and did not consider any specific schemes. As such, until the proposed development scheme is known or clear assumptions or policy requirements put in place, the grey belt status cannot be confirmed. This applies to their contribution to Purposes A, B and C, and in particularly when footnote 7 constraints are present as it is not known how development of the parcel/site would impact on these. Therefore, parcels/broad areas which have been identified as potential grey belt, may not be identified as such once a proposed scheme is known. Furthermore, in some cases, parcels that have not been identified as potential grey belt at this stage, could still be considered grey belt when a planning application or proposed scheme is considered on the site. The design, scale or location of the site will further inform whether the site would be considered grey belt or not when going through the Local Plan or Development Management process.

To note, as highlighted in Section 3.2.5, the Government has proposed an updated definition in respect of identifying grey belt, where the considered of footnote 7 constraints will no longer be factored in. If the draft NPPF is adopted as proposed, any parcels or broad areas that have been categorised as “Yes (footnote 7 constraints)” or “No (footnote 7 constraints)” in this study will automatically become a “Yes” in terms of their grey belt potential. Although it is acknowledged that the presence of other policy constraints would still need to be factored in as part of the Local Plan site selection or decision making process, as these themselves can still place a restraint on development beyond the presence of Green Belt.

Whilst this report can inform Development Management decisions on planning application, it would need to be supported with further site-specific assessments (following the approach taken at recent appeal decisions) to ensure the NPPF requirements are met. This includes establishing where the proposed development is not inappropriate development in the Green Belt as set out by paragraph 155 of the NPPF, and pass the ‘tests’ set out in the PPG (see Figure 3), including whether the site is in a sustainable location, if there is a demonstrable unmet need for the development proposed, and whether the development of the site would not fundamentally undermine the purposes of the remaining Green Belt.

Appendix A – Policy, Guidance and Experience Elsewhere Review

A.1 Review of recent appeals

It is useful and necessary to examine case law as it provides guidance on the interpretation of key terms/concepts within the NPPF, hence increasing the robustness of the study as a whole. It is important to consider the impact of these judgements on Green Belt Assessment methodologies and approaches since Inspectors may consider this at Independent Examination as was the case in North Hertfordshire, where the council was asked to review Green Belt outcomes with respect to recent judgements.

A.1.1 Spatial and Visual Openness

Paragraph 142 of the NPPF states that one of the fundamental characteristics of the Green Belt is its openness. The PPG states that openness consists of both visual and spatial aspects, and that the degree of activity on a site can also impact overall openness. There have been various appeals that have highlighted the important considerations surrounding the interpretation of 'openness of the Green Belt' and are therefore relevant to the assessment of the land against Green Belt purposes.

The Turner judgement (2016)[64] highlighted important considerations on openness. It states that the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Greenness is also a visual quality, and the preservation of the visual openness should also be considered.

> 'There is an important visual dimension to checking "the unrestricted sprawl of large built up areas" and the merging of neighbouring towns, as indeed the name "Green Belt" itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and "safeguarding the countryside from encroachment" includes preservation of that quality of openness. 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.'

Appeal cases in Three Rivers[65] and Cheshire West and Chester[66] further highlight the need to carefully consider 'openness'. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and formed appropriate Green Belt development, therefore the impact of the proposal on openness did not need to be assessed. However, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

> 'I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. …
>
> In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.'

A case in Cheshire West and Chester concerned plans for a new home to be developed on previously developed land designated as Green Belt. The site concerned was a builder's yard on the edge of a washed over village. The Inspector concluded that it could not be considered infill development, given that it was widely spaced from neighbouring houses and had frontages onto different roads. Further the development would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed as follows.

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[64] Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin)

[65] Planning Inspectorate (2018) Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council

[66] The Planning Inspectorate (2018) Appeal Ref: APP/ A0665/ W/ 17/ 3190601 – Clegg v Cheshire

> ‘Indeed, in line with the 2016 Turner v Secretary of State and East Dorset Council judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include how built up the Green Belt is now and how built up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.
>
> In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.’

The Secretary of State[67] approved plans to build a replacement secondary school and new homes on land designated as Green Belt east of Guildford, after ruling that ‘very special circumstances’ had been demonstrated. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, however, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector’s note[68] for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (paragraph 142);
- The key element to assess is the effect that a development has on the openness of the Green Belt;
- The ’concept of ‘openness’ is generally considered to be land being free from built development.’; and
- Although openness should be assessed on an individual site/area basis, the cumulative impact on the Green Belt of development on adjacent sites/areas should be considered.

The Supreme Court in R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3[69] has provided important clarity as to the interpretation of the openness of the Green Belt and the relationship between ‘openness’ and ‘visual impact’ within the planning judgement of the decision maker. The judgment highlighted the important distinction in planning decisions between planning judgement and legal interpretation of planning policy. While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, will not be a strict nor mandatory determinative factor.

On the interpretation of ‘openness’ and the issue of ‘visual impact’ it was noted that:

> ‘The concept of “openness” in paragraph 90 of the NPPF [now paragraph 142] seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: “to prevent urban sprawl by keeping land permanently open …”. Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning

[67] Ministry of Housing, Communities and Local Government, Secretary of State (2018) Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust

[68] The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

[69] https://www.supremecourt.uk/cases/uksc-2018-0077.html

judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development.'

Importantly, the Supreme Court reinforced the importance of planning judgement within the role of the decision maker by stating:

'[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector.

In appeal decision APP/M3645/W/24/3354630 (14th March 2025)[70] the appellant's site was in use as a storage yard for construction materials, equipment and machinery and the inspector adjudged that the intensity of activity and use meant that the site's existing state made a limited contribution to Green Belt openness. In addition, the inspector noted that hedgerows around the site formed a defensible boundary which screened views of the storage yard, resulting in negligible impacts on visual openness.

In contrast, appeal APP/C4615/W/24/3345744 (2nd April 2025)[71] was dismissed by the inspector as it was adjudged that existing mature planting around the site perimeter was insufficient to screen the proposed development from adjacent rights of way, and that the proposed battery storage system would therefore be visually intrusive in its rural location.

A further lesson from the judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),[72] within Three Rivers District, is the confirmation that substantial weight does not have to be given to any harm to the Green Belt deriving from harm to its openness where a proposed development is not inappropriate in the Green Belt (in this case a large data centre deemed to be on grey belt). The ruling also confirms that country parks (one element of the development proposal) preserve openness providing there is not significant built development on them.

This is further confirmed by a High Court case decided 4th June 2025 in which the judge confirmed the Inspector's original conclusion that "the aim of preserving the openness of the Green Belt cannot be compromised by development that is 'not inappropriate', resulting in permission being granted for a gypsy and travellers caravan site [73].

A.1.2 Definition of Sustainable Locations

Paragraph 155 of the NPPF sets out four criteria that, if all met, would make any development appropriate in the Green Belt. Criteria C of paragraph 155 is that the development would be in a sustainable location, with reference to paragraphs 110 and 115. These paragraphs have a focus on access to sustainable transport and active travel modes; paragraph 110 states that "development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes". Paragraph 115 requires that in assessing development sites it should be ensured that sustainable transport modes are prioritised, and that safe and suitable access to the site is available for all users.

The judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),[74] within Three Rivers District, builds on this principle. Baroness Taylor took in to account the definition of the nearby settlement, Abbots Langley, in the Core Strategy Spatial Strategy, as one of six key centres in the District. The fact that the Spatial Strategy describes these centres as the most sustainable locations in the District constituted a reason to describe the site as sustainable. Additionally, Baroness Taylor noted that the Council had already considered and stated the site as appropriate for housing and that were housing to be delivered here it would be seen as sustainably located on the edge of a growth settlement, further influencing the judgement that the proposed development was in a sustainable location.

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[70] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354630&CoID=0

[71] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3345744&CoID=0

[72] https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road__Abbots_Langley.pdf

[73] https://d2nsgnsf036lw8.cloudfront.net/PDFs-documents-and-other-resources/Judgments-and-decisions/Mole-Valley-District-Council-Final-approved-Judgment-for-Hand-Down-14.8.25-00219.pdf

[74] https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road__Abbots_Langley.pdf

This point of view was also advanced by A Knight in their judgement in appeal APP/B1930/W/24/3342701 (3rd February 2025)[75]. In this case the site was determined to be in a sustainable location, satisfying paragraph 155 criteria C, due to suitable access to public transport as the site had good pedestrian connections to local bus networks.

Conversely, in C Hall's judgement in appeal APP/T2215/W/24/3354290 (26th February 2025)[76], the inspector determined that one of the core principles of the Framework is to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling", and that the nine dwellings proposed on the appellant's site at Newington Farm would be highly reliant on private cars due to limited access to local services and facilities by other transport modes. The inspector therefore dismissed the appeal, judging that the site was not in a sustainable location and did not satisfy the criteria in paragraph 155C.

The judgement of A Wright in appeal APP/B1930/W/24/3349988 (19th March 2025)[77] builds on this principle. The appellant's site was within 650m of the nearest bus stop, and the inspector determined that local facilities and services could be accessed within acceptable, comfortable or realistic walking distances as outlined in the Manual for Streets and other guidance. However, the inspector judged that the rural, unlit nature of the route and distances to bus stops and services did not satisfactorily meet the criteria of being accessible to all, or at all times (as outlined in NPPF paragraph 115), therefore making the site not sustainable under paragraph 155 criteria C.

This was reinforced in appeal APP/B3438/W/25/3371499 (18th December 2025)[78] in which the Inspector noted that the site was in a location surrounded by poor quality pedestrian realm, particularly noting that there were no cycle lanes and limited street lighting present, as well as the fact that many pedestrian connections between the site and a bus link and any local services needed to make use of footpaths and pavements that were unmade, rendering them unsuitable for use in poor weather, and an unappealing option to most. On these grounds, the Inspector adjudged that the site was not in a location which is, or can be made, sustainable.

A.1.3 Grey belt in unsustainable locations

In the Newington Farm decision APP/T2215/W/24/3354290 (26th Feb 2025)[79] noted above, the appeal was dismissed due to the site being in an unsustainable location. This decision was made despite the site being identified as grey belt land. The inspector adjudged that the site did not contribute to Purpose A, B or D, and additionally that as it was contained within the boundary of an existing farm which included existing buildings and hardstanding, it made a limited contribution to openness thus not fundamentally undermining the performance of the wider Green Belt. Being in an unsustainable location due to distance from local services and public transport options however was determined to override the grey belt status, making development inappropriate.

Similarly, Inspector D Lewis adjudged in appeal decision APP/Z0116/W/24/3342877 (26th Mar 2025)[80] that the proposed site was not in a sustainable location and moreover was not in a location that could be made sustainable. Although the site was agreed by all parties to be grey belt land, not performing strongly against any of the Purposes A, B, or D, the unsustainability of the location was determined to render the proposal inappropriate development within the Green Belt, and the appeal was dismissed.

[75] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3342701&CoID=0

[76] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0

[77] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3349988&CoID=0

[78] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3371499&CoID=0

[79] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0

[80] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3342877&CoID=0

A.1.4 Definition of towns, sprawl, merging and incongruous development

NPPF paragraphs 143B and D state that two of the purposes of the Green Belt are to prevent neighbouring towns merging into one another, and to preserve the setting of historic towns. There is no definition given in the NPPF as to what constitutes a 'town', but some recent appeal decisions provide some guidance.

In appeal APP/D3640/W/24/3347530 (12th March 2025)[81], an Inspector ruled that the settlements of Bagshot and Windlesham did not constitute towns, being instead "villages of varying scales", and that the appellant's site which fell in between the two settlements did not play a role with respect to paragraph 143B. Both Bagshot and Windlesham had been defined as towns in the LPA's GBA, but the Inspector ruled that this carried less weight than the Council's Core Strategy, in which the settlement hierarchy defined Bagshot as a large village and Windlesham as a smaller village. The Inspector also opined that even if both settlements were considered towns, that the parcel of land in their view would not materially erode the gap between them if released for development. Given that the site did not play a role with regards to paragraph 143B, the Inspector determined that it constituted grey belt land. This appeal was key in informing the principle that the definition of towns with a GBA Purpose B assessment ought to align with the characterisation of settlements within the relevant Local Plan.

Similarly, in appeal APP/M1520/W/24/3351658 (15th April 2025) the Inspector acknowledged that the settlement of Daws Heath in Essex had been classed as a town in the latest GBA and a village in other development plan documents. The Inspector deemed Daws Heath to be a village for the purposes of judging an appeal site close to the settlement on the basis stated that as services and facilities are limited and Daws Heath is not of a large scale, it must be considered a village. The Inspector reiterated that the appeal site could not, therefore, contribute to Purposes A or B given this relates to large built up areas and towns and not villages.

The judgement in appeal APP/H2265/W/24/3347410 (13th February 2025)[82] also provides guidance on the interpretation of Green Belt purposes with regard to preventing urban sprawl and the merging of neighbouring towns. The appellant's site was argued by the council to play a role in preventing urban sprawl as the proposals would contribute to ribbon development along the A20, however the inspector judged that paragraph 143A only refers to the unrestricted sprawl of large built up areas. The nearest settlement (Wrotham) was judged to be a village and therefore not of relevance to this purpose, so the inspector determined that although the site would contribute to ribbon development, this did not amount to the sprawl of a large built up area. The same appeal judgement also stated that London is the most relevant large built up area with respect to paragraph 143A, and that the site in question therefore did not perform strongly against this purpose.

In appeal APP/G5180/W/24/3354266 (31st March 2025)[83], the Inspector judged that neighbouring settlements of Chislehurst, Bickley and Petts Wood had the character of local centres rather than distinct towns as they have significantly merged, and that therefore the appellant's site had a essentially suburban setting, and could not be considered to play a role with regards to preventing neighbouring towns from merging. Given this context, the inspector additionally judged that the site could not play a role in preserving the setting or special of historic towns and the site did not fulfil the purposes set out in paragraphs 143B or D.

In appeal APP/M1520/W/24/3356256 (6th August 2025)[84], the Inspector concluded that when considering the contribution to Purpose B, the appeal site represented "*a very small gap in an otherwise almost continuous stretch of development linking the settlements of Thundersley and Hadleigh"*, in part due to development being visible on all sides of the site. As a result, the appeal site's contribution to the visual separation between Thundersley and Hadleigh is very limited, with it being concluded that the site is grey belt land.

[81] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3347530&CoID=0

[82] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0

[83] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354266&CoID=0

[84] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3356256

In appeal APP/K3605/W/24/3352866 (24th April 2025)[85], the Inspector judged that the site was a logical extension of the built area and would not lead to an incongruous pattern of development (having regard for boundary features that give a strong sense of containment). It was therefore judged that the site does not contribute strongly to Green Belt Purpose A. The site was also judged to perform moderately (and not strongly) in relation to Purpose B as, whilst it forms part of a gap between Hersham and Esher, areas of land to the north, east and south of the site were considered to make more significant contributions and the site could therefore be redeveloped without the loss of visual separation between towns. The site was considered to be grey belt land that complied with the Golden Rules and therefore not inappropriate development.

In appeal APP/P0119/W/24/3357956 (4th July 2025)[86] the Inspector paid significant attention to the assessment of Purpose A. The Inspector acknowledged that the attribute of being 'free from existing development' is one of but not the only relevant consideration for Purpose A. The site, although free of existing sprawl, was physically connected to the large built-up area of Bristol, a conclusion corroborated by the Greet Belt Review; evidence which the Inspector notes is of particular relevance. The Inspector established that it possesses physical features that could restrict and contain development - in particular Ancient Woodland to the west and south (which the Inspector confirms is a clearly discernible physical feature), and Castle Farm Road to the east." The Inspector notes that the site is partially enclosed by existing development such that it would not result in an incongruous pattern of development; and it is subject to other urbanising influences. The proposal was determined to make only a "moderate" contribution to Purpose A as it aligns with the category in the PPG that states that areas are likely to be adjacent or near a large built-up area but includes *one or more* features that weaken the land's contribution to Purpose A. Importantly, the PPG does not require all the listed features in that category to be present. So, whilst the site does not 'contain existing development', that is not determinative of itself.

An appeal regarding a data centre at Abbots Langley, APP/P1940/W/24/3346061 (12th May 2025),[87] identified that the parcel of Green Belt in which the appeal site was situated was well contained by the M25 motorway to its north and areas of previously developed land on the appeal site. As such, it was judged that the site could not be deemed as contributing strongly to Purpose A. The Inspector therefore reaffirmed that physical features such as motorways could be deemed to contain sprawl beyond the settlement in the event of development and must be considered in the determination against Purpose A. This, therefore, would affect the eventual determination of whether parcels and sites can be deemed grey belt or not.

Similarly, an appeal in Havering, APP/B5480/W/25/3371323 (21st January 2026)[88], deemed that strong boundary features or a sense of containment impact a site's role in preventing sprawl. Regarding the site in question, the Inspector stated, "the playing fields are in active use and restrict sprawl to the south. The appeal site is also physically contained by its boundary enclosures. As such, the site makes a moderate, not strong, contribution to checking the unrestricted sprawl…". Additionally, in appeal APP/G5180/W/25/3358392 (2nd July 2025)[89], an A road, railway line and Public Right of Way were identified as prominent physical features that "restrict and constrain development within the triangular area of land", leading to the conclusion that the site did not make a strong contribution to Purpose A.

In appeal APP/C2741/W/25/3360455 (22 January 2026)[90] in York, the parcel of Green Belt in question was not considered to contribute strongly to Purpose A due to the site comprising previously developed land (a caravan site with fencing and an information hut). It would therefore not form additional ribbon development along Millfield Lane because it already exists. It is also physically detached from the large built up area of York and is also distinctly separated from it by the outer ring road. A similar point was made in appeal APP/T0355/W/25/3361175 (17th September 2025)[91], in which a site was deemed to play no role in

[85] Reference: APP/K3605/W/24/3352866

[86] Reference: APP/P0119/W/24/3357956

[87] https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road__Abbots_Langley.pdf

[88] Reference: APP/B5480/W/25/3371323

[89] Reference: APP/G5180/W/25/3358392

[90] Reference: APP/C2741/W/25/3360455

[91] Reference: APP/T0355/W/25/3361175

preventing the sprawl of a large built-up area because it already contained buildings. Both examples demonstrate the importance of considering the extent of existing development when evaluating Purpose A, alongside other factors outlined in the PPG.

In consideration of the appeal APP/K0425/W/24/3351904 (26th Nov 2025)[92], the Secretary of State disagreed with the Inspector's conclusions that the "*site would essentially square off the existing development in area*". It was considered that there are clear physical boundaries to contain development to the north and west (consisting of A-roads and the settlement of Marlow) but the site was not clearly defined to the east and south. On this basis, the Secretary of State concluded that development of the site would "*result in an incongruous pattern of development*", with the land therefore strongly contributing to Purpose A. As such, the site was considered not to be grey belt. Marlow (a town of a population of circa 15,000), will have been considered a large built up area by the Inspector and Secretary of State for Purpose A to be relevant to the decision.

A.1.5 Definition of historic towns and their setting

Historically Purpose D has been considered to apply to very few towns in practice. However, the introduction of grey belt has made it ever more important for a GBA to provide a robust identification of historic towns for Purpose D assessment, a clear understanding of how to identify the historic features of such a town, and a defensible approach to assessing the relationship between a historic town and its surrounding Green Belt. Given the comparatively small number of settlements that may be identified as historic towns, as well as the pattern of modern development that typically encircles historic town centres, limiting their relationship to the Green Belt, consideration of historic towns and Purpose D assessment do not feature as frequently within appeal decisions. Nevertheless, the following relevant appeals have been determined since the publication of the 2025 PPG.

In appeal APP/C2741/W/25/3362064 (17th July 2025)[93], the Inspector confirmed that the primary objective of Purpose D was to safeguard the setting and special character of the historic city of York. Observing the site lay close to an industrial estate and a traveller site and that this existing development interrupted any potential for views towards the city centre (with the Minster at its core), the Inspector concluded that the appeal site did not have any visual, physical or experiential connection with the historic aspects of the city.

In an additional appeal in York - APP/C2741/W/25/3360455 (22nd January 2026)[94] – the Inspector judged that the appeal site could not be found to perform a role against Purpose D. Although the site was located within the Green Belt surrounding the historic town, as a caravan site it could not be found to make a contribution to the special character of York, and was also noted to be physically separated from York's historic core and historic open spaces by some distance, with no intervisibility. This indicates proximity to a historic town alone is not sufficient to establish a role for Green Belt land with regard to Purpose D; its character or visual quality needs to be taken into account for its role in maintaining the town's special character. Additionally, the full extent of an historic town should not necessarily be considered to be itself historic – a historic core should be identified, and the Green Belt should then be considered for its relationship with that particular part of the town and its main historic features.

This is reinforced by the finding of the Inspector in appeal APP/N0410/W/24/3347882 (18th December 2025)[95] that the appeal site was of such a distance from the 'historic part' of the town of Beaconsfield, Buckinghamshire, that the proposal would not have any specific connection with the historic town or form part of its setting.

As mentioned above, in appeal APP/G5180/W/24/3354266 (31st March 2025)[96], the Inspector judged that the neighbouring settlements of Chislehurst, Bickley and Petts Wood had the character of local centres rather than distinct towns as they have significantly merged. Consequently, the Inspector also adjudged that, given

[92] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3351904

[93] Reference: APP/C2741/W/25/3362064

[94] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3360455&CoID=0

[95] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347882&CoID=0

[96] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354266&CoID=0

the appeal site's essentially suburban setting, it could not be considered to play a role with regards to preserving the setting or special of historic towns.

This principle was also present in appeal APP/B5480/W/25/3371323 (21st January 2026) in the London Borough of Havering[97], where Upminster was deemed to not constitute an historic town "given its modern history of residential expansion". The Inspector specifically noted that the appeal site was separated from the town centre by more modern housing development and therefore considered that no role against Purpose D could be attributed to the site.

A.1.6 Scale, granularity and proportionality of assessment parcels

In determining a series of six appeals – APP/H1515/W/24/3341474-79 (16th Jan 2025) [98] – Inspector T Gilbert-Wooldridge noted that all parties to the appeals agreed that the six parcels of land in question would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area. The reasoning behind this was that the parcels were small in size compared to the 'considerable extent' of the Green Belt across the borough (Brentwood). The inspector adjudged that the sites' scale caused them to make no more than a limited contribution to checking the unrestricted sprawl of large built up areas.

Additionally, the inspector stated the following: "Looking at parcels is helpful in a strategic sense to inform plan making and future development growth. However, for decision making, it seems more relevant to look at a site specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site". This aligns with the text of the Green Belt PPG, which indicates that, when identifying grey belt land, using a small number of large parcels will generally not be an appropriate approach and assessment areas should be sufficiently granular to enable their varied contributions to the Green Belt purposes to be functionally determined.

This principle was also established in appeal APP/R3705/W/24/3349391 (11th December 2025)[99] in which the Inspector determined that the findings of the relevant GBA could only be held to have limited weight in determining the proposal. Although the appeal site was within a parcel which North Warwickshire's GBA had assessed as performing strongly against all purposes, the Inspector noted that the site formed only a small part of the parcel, and that therefore the GBA could not be of any significant utility in evaluating the site itself. Ultimately the Inspector's decision overturned that of the Council, and disregarded the GBA's findings, determining that the site did not perform strongly against Purposes A, B or D, therefore being grey belt.

This is further supported by appeal APP/V1505/W/24/3345053 (24th Feb 2025)[100], in the borough of Basildon, where it was determined that though a specific land parcel made strong contributions to Purposes A and B, the site in question '[was] but one small part of the wider parcel' and its site-specific characteristics and setting led to its contributing to those purposes at a lower level, thus making it grey belt.

The Inspector in appeal APP/P1805/W/24/3356219 (15th August 2025)[101] reached the same conclusion for a site in Bromsgrove, judging that "Whilst I am mindful that the parcel, as a whole, may make a strong contribution to Purpose B, the same cannot be said for the appeal site on its own given its location and modest scale". The Inspector disagreed with the Council and overruled the GBA's findings, judging that the site did not perform strongly against Purpose B and therefore constituted grey belt.

A similar case is set out in appeal APP/G2245/W/25/3367917 (7th January 2026)[102] in which the Inspector overturned the council's decision and allowed 39 dwellings in the district of Sevenoaks. Although the appeal site was within a parcel that the council's GBA had determined to perform strongly against Purpose B, the

[97] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3371323&CoID=0

[98] https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=60702043

[99] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3349391&CoID=0

[100] Reference: APP/N0410/W/24/3347882

[101] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3356219&CoID=0

[102] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3367917&CoID=0

inspector noted that the parcel was not of a suitable scale on which to base grey belt identification. As the appeal site only constituted a small part of the parcel, the Inspector concluded that it itself did not play a strong role against Purpose B, thereby being grey belt.

A.1.7 Fundamentally undermine test

In appeal APP/T3725/W/25/3368738 (22nd January 2026)[103], an application for three dwellings on Green Belt land was dismissed after the Inspector concluded that while the site is grey belt, having not met Purposes A, B or D strongly, the site's encroachment into currently undeveloped countryside amounted to a fundamental undermining of Purpose C. Thus, an assessment of all five purposes for the land in question must be undertaken in order to determine whether of the proposal meets the threshold of fundamentally undermining the purposes (taken together) of the remaining Green Belt across the area of the plan.

Scale is of consideration when determining fundamental importance. In Mole Valley, appeal APP/C3620/W/25/3369415 (31st Oct 2025)[104] stated that "the appeal site is small in scale in relation to the size of the Green Belt in Mole Valley, and consequently developing the site as proposed would not fundamentally undermine the purposes, taken together, of the remaining Green Belt land across the area of the plan. The proposal therefore satisfies criterion A of paragraph 155 of the Framework."

In appeal APP/B3438/W/25/3371499 (18th December 2025)[105] in the district of Staffordshire Moorlands the Inspector similarly concluded that the small size of the site, in comparison to the wider Green Belt area, means that its development would not affect the "*ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way*".

In the Wrotham appeal covered above – APP/H2265/W/24/3347410 (13th Feb 2025)[106] – the inspector noted that the proposal would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was adjudged that "*the area lost would be small in relation to the totality of Green Belt which covers nearly three-quarters of the borough*", and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. As in the Brentwood example, the local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel (6.5ha) being judged to be proportionally much less significant.

A similar conclusion was reached in the Dacorum appeal – App/A1910/W/24/3345435[107] (5th Aug 2025) where the Inspector concluded that the appeal site did not have a wider strategic role in the functioning of the borough's Green Belt as a whole. Therefore, the proposal would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the Borough's development plan area.

A.1.8 Footnote 7 land

A further lesson to be drawn from the Wrotham appeal – APP/H2265/W/24/3347410 (13th Feb 2025)[108] – is that the presence of a footnote 7 designation on a site does not automatically mean a proposal will be refused. The site in question was within the Kent Downs National Landscape, but the Inspector adjudged that the proposal would only have a "limited and localised" impact on the protected landscape, therefore not providing the 'strong reason' for refusal required by paragraph 006 of the Green Belt PPG.

A similar conclusion was reached in appeal APP/K0425/W/24/3351904 (26th Nov 2025)[109], whereby the Secretary of State concluded that although the site boundary encroaches into the Chilterns National

[103] Reference: APP/T3725/W/25/3368738

[104] Reference: APP/C3620/W/25/3369415

[105] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3371499&CoID=0

[106] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0

[107] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3345435

[108] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0

[109] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3351904

Landscape, and is located nearby to a couple Listed Buildings and a Conservation Area, "*the application of policies in footnote 7 would not provide a strong reason for refusing or restricting development".* Although noting, it was concluded that the site was not considered to be grey belt due to strongly contributing to Purpose A.

Furthermore, the High Court (30 January 2026)[110] took the opinion that; "In my view the Inspector…was correct to apply the footnote 7 test to the development that was the subject of the application and not to all development, or any hypothetical development...For development control purposes the acceptability or otherwise of that impact will fundamentally turn on the impact of the development applied for. This is particularly clear with heritage and habitats impacts, where some developments might have minimal impact, while others provide a strong reason for refusal."

[110] Reference: Case No: AC-2025-LON-000898

A.2 Comparative review of Green Belt Assessments elsewhere

Table 18. Comparative review of Green Belt Assessments

Local Authority	Summary of Approach	Local Plan Inspector Comments
Greater Manchester Combined Authority Places for Everyone Plan (adopted 21 March 2024) **Stage 1[111] and Stage 2[112] Green Belt Studies (2016 to 2021) (LUC)**	**General approach and scope** The Stage 1 Green Belt Assessment divided the entire Greater Manchester Green Belt into parcels. Two types of parcels were identified: Areas adjacent to built up area and broad areas of Green Belt more remote form. No standard maximum and minimum sizes for the land parcels were set – they were defined according to recognisable boundaries. In addition, a number of Strategic Green Belt Areas were defined an assessed in order to recognise the importance of adequately capturing the strategic as well as the parcel specific role of areas of Green Belt in meeting the purposes defined in NPPF. All parcels were then assessed against the five Green Belt purposes on a desktop basis combined with a field survey of each site. **Approach to defining parcels** Parcels were defined using the following features: • Natural features; for example, substantial watercourses and water bodies. • Man-made features; for example, motorways, A and B roads and railway lines. Where no other suitable boundary exists, less prominent features were used to define the parcel boundaries. This includes walls, woodland, hedgerows, tree lines, streams and ditches. **Approach to assessing the five Green Belt purposes**	The Places for Everyone Inspector's Report[113] at paragraphs 202-204 comments on the Green Belt evidence. The Inspector states: "*202. The role that each allocation serves in checking the unrestricted sprawl of large built up areas, safeguarding the countryside from encroachment, preventing neighbouring towns merging into one another and preserving the setting and special character of historic towns, along with the impact that the proposed development would have on those Green Belt purposes, was assessed during the preparation of the Plan in a consistent and systematic manner* [through the Stage 1 and 2 Green Belt Studies 2016 to 2021]. *203. The potential impact of removing any particular site from the Green Belt on urban regeneration is difficult to assess. Various policies in the Plan aim to make as much use as possible of previously developed land, and this will be taken forward through individual local plans and planning decisions. Part of the justification for removing many of the allocations from the Green Belt is that, because of their location and/or scale, they provide opportunities for different types of development to that which could be attracted to urban brownfield sites. Overall, we are satisfied that the development proposed on the 38 allocations in the Plan would not have any significant impact on urban regeneration, and that the assessment of the impact on Green Belt purposes represents adequate and proportionate evidence.* *204. That evidence indicates that development on each allocation would cause harm to one or more Green Belt purpose, and that the overall harm in each case would vary from low to very high. Whilst the assessments are judgement-based, we are satisfied that the approach taken was informed and consistent.*

[111] https://greatermanchester-ca.gov.uk/media/1807/greater-manchester-green-belt-assessment.pdf

[112] The Stage 2 study involved a suite of assessments including: Assessment of Proposed 2019 GMSF Allocations (2020), Addendum: Assessment of Proposed 2020 GMSF Allocations (2020), Contribution Assessment of Proposed 2020 GMSF Green Belt Additions (2020), Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions (2020), Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in the vicinity of Proposed 2019 Allocations (2020) and PfE Addendums to the Stage 2 Greater Manchester Green Belt Study (2021) – as described in the Green Belt Topic Paper (https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/07%20Greener%20Places/07.01.25%20Green%20Belt%20Topic%20Paper%20and%20Case%20for%20Exceptional%20Circumstances%20to%20amend%20the%20Green%20Belt%20Boundary.pdf)

[113] https://www.greatermanchester-ca.gov.uk/media/9282/pfe-inspectors-report-01-final.pdf

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	Rating The parcels were rated strong, moderate, weak, no contribution or not applicable. The Strategic Green Belt Area had slightly different rating of strong, moderate-strong, moderate, weak-moderate, weak, and no contribution. Purpose A The 'large built up area' is defined for the purposes of the study taking into account the original purpose of the Manchester Green Belt. The study notes there is a visible continuous urban mass that stretches across all of the ten local authorities and therefore all settlements within this main urban area should be included. Criterion 1a considers whether land has already been affected by sprawl and whether it retains an open character. Criterion 1b considers the role of boundary features, the nature of the settlement form (i.e. potential for rounding off), the presence of roads (i.e. potential for ribbon development), and potential for sprawl to occur beyond the parcel boundary (i.e. due to boundaries or enclosure) in affecting the potential for urban sprawl to occur in the absence of the Green Belt designation. Purpose B The study defines 'neighbouring towns' as all inset settlements in Greater Manchester and identifies a number of settlements outside of Greater Manchester. The assessment does not provide a distance measurement and instead considers the physical and visual role of the parcel in preventing the merging of settlements (including consideration of perceptual issues). Purpose C The criteria considers whether the parcel has the characteristics of countryside and/or connects to land with the characteristics of countryside. It also considers whether the parcel has been affected by encroachment.	*Unless otherwise specified below in relation to a particular site, we agree with the level of harm to Green Belt purposes identified."*

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	Purpose D The study defines 'historic town' by reference to the Greater Manchester Historic Landscape Characterisation combined with analysis of Conservation Areas. For those settlements outside of Greater Manchester, the presence of a Conservation Area was used as the determining factor. In assessing the historic towns, a theoretical analysis based on standard building height and bare ground topography using a digital ground model was undertaken. This was then confirmed through a field survey. Purpose E The study notes that Purpose E is important and should be afforded equal weight with Purpose A-D however states it is not possible to assess the performance of Purpose E on a parcel by parcel basis. No assessment of Purpose E was undertaken. Overall assessment The study presents the findings based on each purpose. No aggregation of ratings is undertaken. **Consideration of Green Belt harm** The Stage 2 study provided an assessment of harm based on the proposed site allocations. It considers the extent to which the release of land within each proposed site allocation would reduce the contribution to Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the adjacent Green Belt, bearing in mind factors such as the extent to which adjacent retained Green Belt would become contained by new development and the impact on the strength of remaining Green Belt boundaries. The assessment involved five key steps: Step 1 – Consideration of the relevance of each Green Belt purpose to the area; Step 2 – Analysis of how the allocated site relates to the urban edge and/or wider countryside;	

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	Step 3 – Assessment of the contribution of land within the allocation to the Green Belt purposes; Step 4 – Assessment of the impact of release from the Green Belt on adjacent retained Green Belt land Step 5 – Identification of variations in harm to the Green Belt within the Allocation i.e. as sub areas where relevant, marking out areas more or less suitable for development with a view to potential for minimising harm. Each allocation and sub-area received a 'harm' rating of Very High, High, Moderate-High, Moderate, Low-Moderate, Low or Very Low. The assessment does not draw conclusions on what land should be released to accommodate development but identified variations in harm to the designation.	
Warrington Local Plan (adopted 4 December 2023) **Green Belt Assessment (2016)[114] and Implications of Green Belt Release Report (2021)[115] (Arup)**	**General approach and scope** The Green Belt Assessment undertook a two stage approach dividing the entire Warrington Green Belt into general areas and assessing these against the five purposes. Following on from this, one width of parcels were defined around the Warrington urban area, all inset settlements, and settlements in neighbouring authorities which abutted the Green Belt boundary. These parcels were assessed against the five Green Belt purposes. The general area assessment was undertaken on a desktop basis only. The parcel assessment involved a combination of desktop assessment and a site visit of each parcel. **Approach to defining parcels** General area were defined using the strongest boundaries consisting of motorways, A roads, main waterways, and railway lines. As this resulted in a number of disproportionately small general areas, some of	The Local Plan Inspector's Report[117] focuses on the strategic and site level exceptional circumstances case and the outcomes of the Green Belt site assessments however it does not comment on the approach or the methodology.

[114] https://www.warrington.gov.uk/sites/default/files/2022-05/Green%20Belt%20Assessment%20-%20October%202016.pdf

[115] https://www.warrington.gov.uk/sites/default/files/2021-09/green_belt_site_selection_-_implications_of_green_belt_release_-_august_2021.pdf

[117] https://www.warrington.gov.uk/sites/default/files/2023-10/Warrington%20Local%20Plan%20-%20Inspectors%27%20Report%20-%20October%202023.pdf

Local Authority	Summary of Approach	Local Plan Inspector Comments
	these were merged. A threshold of 150ha was used as this was considered to maintain a strategic emphasis. In defining parcels, 'durable features' were used in the first instance, following by 'features lacking durability'. Table 3 of the report sets out how these features are defined. **Approach to assessing the five Green Belt purposes** <u>Rating</u> A qualitative scoring system was applied to each purpose and overall consisting of strong, moderate, weak and no contribution. <u>Purpose A</u> The 'large built up area' was defined for the purposes of the assessment as the Warrington urban area. The assessment included four criteria: • Whether the parcel was adjacent to the large built up area. Parcels which were not adjacent were assessed as no contribution. • Whether there was an existing durable boundary between the parcel and the built up area which could prevent sprawl. • The connection to the built up area (i.e. the potential for rounding off). • Whether the parcel plays a role in preventing ribbon development. <u>Purpose B</u> 'Neighbouring towns' were defined as the Warrington urban area and the inset settlements of Culcheth and Lymm, as well as a number of settlements in neighbouring authorities. Not all inset settlements were considered relevant for Purpose B and only those settlements defined as neighbourhood centres in the Warrington Retail Centres Report and the Local Plan Core Strategy were deemed relevant as these had the highest level of population outside of the main urban area.	

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	The assessment considered whether a reduction in the gap between the neighbouring towns would compromise the openness of the Green Belt and lead to the actual or perceived merging of the towns. This was on a case by case basis and not set by distance measurements. The following terminology was used to define the gap: essential gap, largely essential gap, and less essential gap. Purpose C The assessment used the following criteria: • Whether there were existing durable boundaries which would contain any future development and prevent encroachment in the long term (taking into account both the boundary between the parcel and the settlement, and the boundary between the parcel and the countryside). • Whether there was existing encroachment (i.e. the existing land use). • The degree of connection to the countryside and the degree of openness (taking into account built form, the presence of views, and vegetation). • Whether the parcel serves a beneficial use of the Green Belt. Purpose D The assessment defines 'historic town' based on the Cheshire Historic Landscape Characterisation (2007) and the Cheshire Historic Towns Survey (2003). Lymm and Warrington are defined as historic towns, in addition to the neighbouring authorities of Widnes and Runcorn. In reviewing the relevant Conservation Area appraisals, a number of important viewpoints were identified and mapped and are considered as part of the assessment. The assessment uses the following criteria: • Is the parcel adjacent to a 'historic town' and/or crosses an important viewpoint of the spire of the Parish Church of St Elphins?	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	• Assess the proximity of the town's relevant Conservation Areas to the Green Belt (a 250m was applied to undertake this in order to bring the relationship between the Conservation Area and the Green Belt into focus). • Is there modern built development which reduces the role of the Green Belt in preserving the setting and special character? • Are there any other designated heritage assets within the 250m buffer which add to the setting and special character and / or does the parcel crosses an important viewpoint of the spire of the Parish Church of St Elphins? <u>Purpose E</u> All Green Belt was assessed as 'moderate contribution' for this purpose. The assessment notes that the alternative approach of assessing the urban potential by individual settlement within the authority would result in a skewed assessment given the size of the inset settlements. <u>Overall assessment</u> The document provides guidance on how to assess the overall contribution. Where there is a clear majority contribution, this is applied in most cases. In other cases, professional judgement is applied taking into account the overall aim and purpose of the Green Belt. **Consideration of Green Belt harm** The 2016 assessment did not consider the potential harm to the Green Belt of releasing certain parcels as this was not within the scope. Further in the plan-making process, an assessment of the implications for the Green Belt resulting from the proposed allocations was undertaken which considered the site's existing contribution to Green Belt purposes, the impact of removing the site on Green Belt purposes, any cumulative impacts, and the resultant Green Belt boundary. A	

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	conclusion on the Green Belt impact was made (Implications of Green Belt Release report (August 2021)[116]).	
Calderdale Council Local Plan (adopted 22 March 2023) **Green Belt Assessment (2017) (Calderdale Council)[118]**	**General approach and scope** The method consists of three distinct stages: initial sieving, parcel identification, and parcel testing. The initial sieving process considered the whole of the Calderdale Green Belt and the area around Todmorden (although this is not in the Green Belt) and removed areas protected by national and international designations (SPA and SAC) and areas which scored below 6 in the Council's Settlement Hierarchy model. Areas scoring less than 6 were deemed to have a low sustainability score and therefore contradicted the NPPF paragraph 84 which required Green Belt boundaries to take into account the need to promote sustainable patterns of development. Following the sifting process, parcels were then defined and assessed against the five NPPF purposes. Council officers undertook the assessment through a desktop basis as well as site visits. **Approach to defining parcels** Parcels were defined using the following criteria: • Parcels should not cross significant boundaries such as motorways, rivers or protected woodlands. Each parcel should be clearly defined by durable, significant and strong physical boundaries wherever possible; • Parcels should take account of changing landscape and landform and should therefore be of similar character and land-use; • The land within each parcel should have a similar impact on the openness of the Green Belt; and	During the Examination hearing sessions, the Local Plan Inspector sought justification from the Council on the local interpretation of Purpose D in the Green Belt Assessment and Green Belt Assessment of Site Options. Following discussions at the Matter 12 hearing, the Inspector requested that the Council undertake sensitivity testing on Purpose D for the Green Belt Assessment and the Green Belt Assessment of site options by omitting Purpose D in order to show if its omission changes the overall results/conclusions. The Council produced a document: 'Green Belt Assessment and Green Belt Site Assessment Sensitivity Testing Paper' (December 2020).[119] This concluded that the omission of Purpose D from the Green Belt Assessment and the Green Belt assessment of site options would not impact on the allocations for development put forward by the Council. Whilst a small number of filtered sites would be affected by a sensitivity change in Green Belt status from most sensitive to medium sensitive, this change would not affect the Council's decision to filter those sites with other factors determining this decision. Whilst one allocated site would experience a change in sensitivity due to the omission of Purpose D, this change would be from most sensitive to medium sensitive and would not change the Council's decision to allocate the site. The Local Plan Inspector's Report[120] comments on the Green Belt evidence at paragraph 191-192: *"191. For site options in the Green Belt, the Council's Green Belt Assessment (2017) was also a key document. The review focuses on land outside the urban area that is not within the SPA/SAC and which scores highly in terms of sustainability. The approach is consistent with the need to protect internationally important ecological areas, and national guidance that requires*

[116] https://www.warrington.gov.uk/sites/default/files/2021-09/green_belt_site_selection_-_implications_of_green_belt_release_-_august_2021.pdf

[118] https://new.calderdale.gov.uk/sites/default/files/2023-06/Local-plan-green-belt-review-2017_0.pdf

[119] https://new.calderdale.gov.uk/sites/default/files/2023-06/CC107-Green-Belt-Review-and-Site-Assessment-Sensitivity-Test.pdf

[120] https://new.calderdale.gov.uk/sites/default/files/2023-06/Calderdale_Local_Plan_Inspectors_Report.pdf

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	• Parcels should be smaller in area where they are located close to existing boundaries. **Approach to assessing the five Green Belt purposes** <u>Rating</u> The criteria against each purpose were assessed on a 'yes/no/partial' basis resulting in an overall purpose rating of 'yes/no'. <u>Purpose A</u> The method defines 'large built up area' as including the seven main towns (Halifax, Brighouse, Elland, Sowerby Bridge, Mytholmroyd, Hebden Bridge and Todmorden) and the smaller settlements some of which are continuous to the built up area (these including Ripponden and Rishworth, and Luddenden and Luddenden Foot). The method notes that the definition of large built up area and town is same for the purposes of the Green Belt Assessment unless otherwise stated. The assessment criteria for Purpose A is as follows: • Does the parcel act as an effective barrier against sprawl from large built up areas? • Does the parcel constitute, as part of a wider network of sites, a strategic barrier against the sprawl of large built up areas? • Is there a robust permanent Green Belt/ development boundary? • Is the land separate from the large built up area? • Would the loss of this Green Belt land potentially lead to ribbon development? • Would development result in an isolated development site not connected to existing boundaries? • Would development of the parcel create an irregular settlement pattern? • Is this Green Belt parcel connected by two or less boundaries to the built up area? • Is the land contiguous with other Green Belt up to and beyond the District boundary?	*authorities to take account of patterns of sustainable development when drawing up Green Belt boundaries.* *192. The fourth Green Belt purpose is interpreted in the Green Belt Assessment and site assessment process as preserving the setting and special character of historic features, rather than historic towns as set out in paragraph 80 of the NPPF 2012. However, sensitivity testing involving the neutralisation of this element shows that only a small number of parcels and sites would change from most sensitive to medium sensitive and conclusions regarding suitability for release are not affected as other factors were determinant. The Green Belt Assessment provides an appropriate framework for assessing harm and has been carried out in a consistent and robust manner.*"

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	Purpose B The areas defined as 'large built up area' for Purpose A are considered to represent 'towns' for the assessment of Purpose B. The criteria for Purpose B therefore makes reference to 'large built up area'. The method includes the following criteria: • Does the parcel provide part of a gap or space between existing large built up areas? • What is the nature of the countryside between the towns, rural or semi- rural? • Is there visibility between large built up areas? • Do natural features and infrastructure provide a good physical barrier or boundary to the parcel that would ensure that development was contained? • Is the parcel sparsely developed or undeveloped? • Would the loss of this Green Belt land lead to a significant reduction in the distance between towns? • Would the loss of this Green Belt land increase the potential merging of towns? • Would the loss of this Green Belt land potentially lead to ribbon development between towns? Purpose C The method includes the following criteria: • Is the parcel free from significant encroachment? If there is significant encroachment, what is the proportion as a % of the parcel? • Is there a strong, defensible boundary between the existing urban area and the parcel? • Is there a landscape designation? • Is there a wildlife designation or value? • Is there a geological or geomorphological designation or value? • Is there a rural land use? • Is the land tranquil?	

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	• Is there public access or recreational use? • Are the functions of the land consistent with its Green Belt designation? • Does the parcel include any best grade 1, 2 or 3 agricultural land? • Is the parcel free from derelict brownfield land? • Is the predominant use of land and buildings agricultural? <u>Purpose D</u> The method has regard to where there is a clear visual link between open space within the Green Belt and recognisable historic settlement patterns, for example through the presence of a Conservation Area. A historic settlement was deemed to be a settlement or place with historic features identified in local policy or through conservation areas or other historic designations. The method includes the following criteria: • Is the land part of the setting of a historic place or settlement, listed building or conservation area? • Would the loss of this Green Belt land adversely affect the special character of a historic place or settlement? • Would the loss of this Green Belt land reduce the significance of a historic place or settlement? • <u>Purpose E</u> All parcels are scored the same against this purpose and were therefore scored 'yes' for Purpose E. <u>Overall assessment</u> The assessment judges the value of the Green Belt on the basis of parcel sensitivity by establishing if each parcel meets the five purposes. Parcels that meet 3-5 of the identified purposes are assessed as 'most sensitive' and it is proposed that these will be retained in the Green Belt. The remainder of the parcels, meeting 0-2 of the identified purposes have been classified as 'mid-sensitive'. It is considered that	

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	these parcels should ideally be taken forward and considered for detailed study. Each purpose is considered to be equal and no weighting to any of the assessment criteria is applied. **Consideration of Green Belt harm** The Green Belt Assessment did not have a specific harm assessment however the consideration of harm was linked to the sensitivity classification applied as part of the overall assessment process above. The higher number of purposes a Green Belt parcel satisfied, the greater its sensitivity and value. By setting the 'most' sensitive classification as Green Belt meeting 3-5 purposes, it was considered that the most valuable Green Belt would be identified and offered protection. By setting the 'mid' sensitive classification as Green Belt meeting 0-2 purposes, the least valuable Green Belt would be identified.	
North Hertfordshire Council Local Plan (adopted 8 November 2022) **Green Belt Assessment (2016)[121] (North Hertfordshire Council and Amec Foster Wheeler)** **Green Belt Assessment Update (2018)[122] (North Hertfordshire**	**General approach and scope** The Green Belt Assessment and Green Belt Assessment Update seek to assess the performance of strategic land parcels, sub-parcels and sites being considered for development in the Plan against the purposes of Green Belt. The Green Belt Assessment is split into two parts: Part 1 is a strategic level review of the current Green Belt and a more detailed assessment of potential development sites. Part 2 is an assessment of the countryside beyond the Green Belt. For Part 1, the entire Green Belt was divided into parcels which were assessed against the four purposes of Green Belt. The parcels were then sub-divided into sub-parcels and the same criteria was applied in assessing these against the four purposes of Green Belt. The analysis of	The Local Plan Inspector's Report[125] at Issue 3 (paragraph 148 onwards) considers whether the Green Belt Assessment and its update was a robust evidential basis for determining exceptional circumstances. The Inspector states: *"150. The Review and the Update consider Green Belt issues in depth. The Review assesses the contribution made by parcels of land to four of the five purposes for including land in the Green Belt.* ***It does not include an assessment against the fifth purpose*** *of including land in the Green Belt, being to assist in urban regeneration by encouraging the recycling of derelict and other urban land. The Council considers that, in effect, the assessments against the other four purposes act as a proxy for this purpose.* ***That is a reasonable stance to take, and I regard the approach taken here to be both suitable and proportionate.*** *Looking firstly at larger swathes of land and then 'drilling down' to analyse much smaller sub-parcels, the Review also presents the view*

[121] https://www.north-herts.gov.uk/sites/default/files/CG1%20Green%20Belt%20Review.pdf

[122] https://www.north-herts.gov.uk/sites/default/files/ED161A%20NHDC%20Green%20Belt%20Review%20update%20-%20main%20report.pdf

[125] https://www.north-herts.gov.uk/sites/default/files/2022-09/North%20Herts%20Inspectors%20Report%20-%20Final.pdf

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Council) and Appendices[123] (Note: The Green Belt Assessment Update was undertaken following the submission of the Local Plan due to more recent case law on the definition of 'openness' which confirmed it had both a spatial and visual dimension. The Update sought to ensure that both spatial and visual elements of openness had been properly considered in the assessments – this predominantly related to Purpose C).	strategic parcels and sub-parcels is based on the assessment of the situation 'as is'. Following the parcel and sub-parcel assessment, sites were assessed against the four Green Belt purposes. The assessment of sites gives consideration to impacts upon Green Belt should the site be developed in future. Sites which passed the three key tests of suitability, availability and achievability in the SHLAA were assessed. The review was completed using a desktop analysis combined with fieldwork involving a visit to each parcel. **Approach to defining parcels** The entire Green Belt was divided into parcels using boundaries of roads and other clearly visible physical features in the landscape. Following on from this, the parcels were sub-divided into sub-parcels. **Approach to assessing the five Green Belt purposes** <u>Rating</u> Qualitative scoring was applied based on the parcel or site making a significant, moderate or limited contribution to Green Belt purposes. <u>Purpose A</u> The assessment criteria is as follows: What role does the land play in preventing the spread of development outwards from larger settlements? The method does not specifically define 'large built up area' and it is not clear what the larger settlements are deemed to be. <u>Purpose B</u> The assessment criteria is as follows: What role does the land play in maintaining the separation of towns?	*of its authors about the overall contribution made by each individual sub-parcel.* *151.Potential development sites are also assessed in the Review, again against the same four purposes of including land in the Green Belt. This includes all the sites currently in the Green Belt that are proposed for allocation in the Plan. Criteria are used to represent each purpose, and a scoring system is deployed. For example, in relation to the purpose of preventing towns merging, one criterion used is the distance from the edge of the site to the nearest built up edge of a town, and scores from one to three are assigned depending on the distance involved.* *152.The Review also reaches a view about the overall contribution made by each potential development site to the purposes of including land in the Green Belt. The scoring for each of the individual Green Belt purposes has been considered and professional judgement applied to reach an overall conclusion as to whether the site makes a significant, moderate or limited contribution.* *…156.**There is no prescribed methodology for undertaking Green Belt assessments** of this sort. As I see it, the general **approach and methodologies used by the Council are appropriate** for the task. **All the criteria used throughout the various assessments are rational and suitable.** Although laden with planning judgements on the part of the authors, that is inescapable and does not undermine the work in any way. I note that the assessments **do not rely on desk top studies but have included field work and visits** to the land in question. This is reassuring and bolsters the confidence one can place in the judgements reached.* *157.One consequence of the methodology used is that it is possible for a site's overall contribution to the Green Belt to be judged as less than the contribution it makes in respect of some individual Green Belt purposes. For example, it is possible that a site considered to make a significant contribution in relation to checking unrestricted sprawl could be judged to make a moderate overall contribution. Some suggest that, as a matter of principle, the overall 'score' should reflect the highest contribution to any one of the individual purposes.*

[123] https://www.north-herts.gov.uk/sites/default/files/ED161B%20NHDC%20Green%20Belt%20Review%20update%20-%20appendices.pdf

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	The method does not specifically define 'neighbouring towns' for the purposes of the assessment. The assessment seems to relate to all inset settlements. Purpose C The assessment criteria is as follows: Are there already urbanising influences? Does a strong boundary exist to contain development? The Green Belt Assessment Update mainly impacted upon Purpose C in ensuring that both the spatial and visual dimensions of openness had been considered. Additional criteria were included in the Update to assess 'visual openness' and 'physical openness' based on low/mixed/high. It is not clear from the method how the ratings were applied and what specifically was taken into account. Purpose D The assessment criteria is as follows: Is there a link with or views to the historic parts? What relationship or connection does the land have with the character of the town? The method does not specifically define 'historic town'. Purpose E The method notes that the re-use of previously developed land is achieved consistently through the application of Green Belt policy. Therefore no assessment is made against this criterion. Overall assessment An overall evaluation of the contribution to Green Belt purposes is undertaken however the approach to this is not described in the method. **Consideration of Green Belt harm** The Green Belt Assessment and Green Belt Assessment Update does not consider Green Belt harm per se. They consider the existing contribution of parcels and sub-parcels to Green Belt purposes. The assessment of sites considered the impact on the Green Belt should the	*158.I disagree.* ***In the absence of prescription, it seems to me logical to 'step back' and reach a rounded judgement taking into account the performance of the land in question in relation to all the Green Belt purposes overall.*** *Without such a 'sense check', one purpose could skew the outcome. For example, almost any incursion of built development into the Green Belt would be at risk of falling foul of the purpose of safeguarding the countryside from encroachment. In an exercise where the purpose is to evaluate the relative value of land parcels to the Green Belt, that would not be helpful.* ***To offer the facility of meaningful comparison, it strikes me as most instructive to consider performance against the purposes of including land in the Green Belt overall.*** *On this point, therefore, I consider the Council's approach to be appropriate for the task.* *159.In a number of cases the Update leads to different conclusions from the Review about the overall performance of sites in relation to the purposes of including land in the Green Belt, one way or another. However, this does not undermine the proposed allocations. In my view, taking account of the Council's sustainability appraisal work and the site selection methodology, which I consider later in this report, I am satisfied that the changes involved do not lead to other sites being preferable.* *160.Some disagree with the judgements reached in some cases. That is not surprising – even two wholly rational and unbiased individuals can reach different conclusions where judgements of this nature are concerned. Others claim that the methodologies have been applied inconsistently. But I am not persuaded that any inconsistencies undermine the work overall or lead to any wholly unfounded or irrational outcomes.* *161.Overall, I am satisfied that the Review and the Update, taken together, properly reflect the fundamental aim of Green Belts, their essential characteristics of openness and permanence, and the five purposes of including land in them. In short, these documents represent a sufficiently robust body of evidence that is comfortably fit for the purpose intended."* (emphasis added)

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	site be developed. The Housing and Green Belt Background Paper[124] considers the harm to the Green Belt of the proposed allocations at a strategic scale. It considers potential mitigation which could alleviate impacts upon the wider Green Belt. The Green Belt Assessment Update at paragraph 1.6 refers to '*…statements and evidence submitted to the Examination by NHDC which considered the harm to the Green Belt of the proposed allocations in the Plan on a case-by-case basis. In line with the principles of relevant case law, this evidence also considered the extent to which these harms might be ameliorated to the fullest reasonable extent should sites be developed.'*	
Cheshire East Council Local Plan Strategy (adopted 27 July 2017) **Green Belt Assessment Update (2015) (Arup)**[126]	**General approach and scope** The Green Belt Assessment undertook a two stage approach dividing the entire Cheshire East Green Belt into general areas and assessing these against the five purposes. Following on from this, one width of parcels was defined around all inset settlements and settlements in neighbouring authorities which abutted the Green Belt boundary. These parcels were assessed against the five Green Belt purposes. The general area assessment was undertaken on a desktop basis only. The parcel assessment involved a combination of desktop assessment and a site visit of each parcel. **Approach to defining parcels** General areas were defined using the strongest boundaries consisting of motorways and A roads. In defining parcels, national and international designations (SSSI, Ramsar, SAC and SPA) were firstly screened out. Parcels were drawn from the settlement inset boundary to the nearest strong boundary in the first instance, followed by moderate and then weak boundaries. A grading priority was given to the boundary features, and this is set out on Table 4-1 of the assessment. All parcels over 5ha were deemed to	Local Plan Inspector Interim Views (October 2014) [128] - following the Inspector's Interim Views, several flaws were identified in the Council's Green Belt Assessment methodology, including: • There were several cases where the Green Belt assessment does not support the release of specific sites from the Green Belt and the review appears to have given greater weight to other factors, such as land ownership, availability and deliverability when preparing and finalising the Plan. • There is inconsistency in the scale of the parcels assessed, in that, very large tracts of land have been assessed against smaller sites and some very small areas of land have been omitted. • The review does not consider all the purposes of the Green Belt, omitting the contribution to urban regeneration and preserving the setting and special character of historic towns. Although the latter purpose may apply only to historic towns like Chester, the impact on urban regeneration does not seem to have been assessed. • In response, a Green Belt Assessment Update was prepared by Arup in 2015 which defined both General Areas and Green Belt parcels.

[124] https://www.north-herts.gov.uk/sites/default/files/HOU1%20Housing%20and%20Green%20Belt%20background%20paper.pdf

[126] https://cheshireeast-consult.objective.co.uk/kseapi/public/files/3478926

[128] https://moderngov.cheshireeast.gov.uk/documents/s57237/Appendix%201a%20Inspectors%20Interim%20Views.pdf

Local Authority	Summary of Approach	Local Plan Inspector Comments
	be 'large' and where possible these parcels were reduced using the next categorisation down of boundary features. **Approach to assessing the five Green Belt purposes** <u>Rating</u> A qualitative scoring system was applied consisting of major, significant, contribution, and no contribution. <u>Purpose A</u> The 'large built up area' was not specifically defined and was deemed to include all inset urban areas. The assessment included three criteria: • Would future development be firmly contained by strong or physical features? • Does the parcel protect open land that is well connected or contained by the urban area and would development help "round off" the settlement pattern? • What role does the parcel play in preventing ribbon development? <u>Purpose B</u> 'Neighbouring towns' were defined as all inset settlement and villages. The assessment considered whether a reduction in the gap between the neighbouring towns would compromise the openness of the Green Belt and lead to the actual or perceived merging of the towns. The following terminology was used to define the gap: essential gap, largely essential gap, and less essential gap. The assessment considered whether natural features or infrastructure played a role in maintaining the presence of the gap.	Local Plan Inspector Further Interim Views (December 2015)[129] - following the Green Belt Assessment Update (GBAU), the Inspector published his further interim views. Paragraphs 41-46 discuss the Green Belt Assessment Update. The Inspector noted that the independent two stage assessment of general areas followed by smaller parcels, assessing the relative significance of the contribution of each parcel against the five purposes of Green Belt followed by an overall assessment enabled a **comprehensive, consistent and proportionate approach** to be taken. He notes that only 'Green Belt factors' are assessed without potential areas for development thus providing a key input into the site selection process: *"…the approach set out in the GBUA seems to reflect national policy and address most of the shortcomings of the previous Green Belt assessment. It provides a set of more comprehensive and proportionate evidence to inform, rather than determine, where the release of Green Belt land may be necessary at the site-selection stage." (Paragraph 46)* The Inspector dismisses participants concerns relating to boundary definition noting that "…*in most cases, "strong" boundaries have been used, taking account of established physical features and committed new road schemes, where appropriate; the size of most of the larger land parcels has been reduced, with a 5ha indicative threshold for strategic sites, and detailed points about specific land parcels, including the identification of smaller and larger sites, can be reconsidered at the site-selection stage."* (Paragraph 44) The Inspector acknowledges the complexity of the process and the involvement of professional judgements. He emphasises the needs for consistency and transparency using available and proportionate evidence: "*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. More particularly, the GBAU is the only comprehensive evidence which assesses all potential land parcels on an objective, consistent and comprehensive basis"* (Paragraph 44)

[129] Inspector's further interim views on the additional evidence produced by the Council during the suspension of the examination and its implications for the submitted Local Plan Strategy. Available at: https://moderngov.cheshireeast.gov.uk/documents/s57238/Appendix%201b%20Inspectors%20Further%20Interim%20Views.pdf

Local Authority	Summary of Approach	Local Plan Inspector Comments
	Purpose C The assessment used the following criteria: • Are there strong and robust boundaries to contain development and prevent encroachment in the long term? • Existing urbanising influences: A. What is the existing land use / uses? B. What is the proximity and relationship to the settlement? C. What is the relationship to the countryside? • Does the parcel protect the openness of the countryside? (taking into account built form, long line views and vegetation). • Does the parcel serve a beneficial use of the Green Belt which should be safeguarded? Purpose D The assessment defines 'historic town' based on the Cheshire Historic Towns Survey (2003) and the Cheshire Historic Landscape Assessment (2007). It also considered whether the settlement was listed in the Domesday Book and the historic fabric linked to a Conservation Area. The assessment uses the following criteria: • Is the parcel near to a 'historic town'? • Has the historic core been diluted through modern infill development within the development limits? In order to assess this, the proximity of historic elements to the Green Belt was considered based on a buffer of 500m for those 'historic towns' which were Principal Towns and 250m for those which were Key Service Centres and Local Centres. • What role does the Green Belt play in preserving the setting and special character of the historic town? (This takes into account views, landmarks, and historic features). Purpose E The assessment of Purpose E took into account the brownfield and urban potential of settlements within Cheshire East as well as the neighbouring authorities. A percentage was calculated taking into the	In relation to the inclusion of Purpose D, the Inspector comments: "*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."* (Paragraph 45) He notes that the assessment of Purpose E: "*…largely focuses on brownfield sites within the nearest settlement, and enables a differentiation between settlements to be made and provides a consistent, transparent and proportionate approach to this element of the assessment; the focus on regeneration issues internal to Cheshire East reflects the views of the Greater Manchester authorities. The overall assessment involves matters of judgement and confirms that each purpose was given equal weighting and provides the reasons for the overall assessment."* (Paragraph 45) Local Plan Inspector Interim Views on the Further Modifications (December 2016) - the Inspector did not provide any further comments on the Green Belt methodology however reiterated his comments made in December 2015 supporting the approach and methodology taken.

Local Authority	Summary of Approach	Local Plan Inspector Comments
	brownfield commitments within each settlement against the total dwellings within that settlement. A threshold range was attributed to the level of contribution and each parcel was assessed taking into account the brownfield urban potential of the respective settlement. Overall assessment The document provides guidance on how to assess the overall contribution. Where there is a clear majority contribution, this is applied in most cases. In other cases, professional judgement is applied taking into account the overall aim and purpose of the Green Belt. **Consideration of Green Belt harm** The Site Selection Methodology[127] details the Site Selection Process which included Green Belt Site Assessments which considered the following: • potential area of Green Belt for release • Green Belt assessment for potential area of release • resulting Green Belt boundary • assessment of surrounding Green Belt • exceptional circumstances.	

[127] https://www.cheshireeast.gov.uk/planning/spatial-planning/cheshire_east_local_plan/site-allocations-and-policies/sadpd-examination/documents/examination-library/ed07-site-selection-methodology-report.pdf

A.3 Comparative review of neighbouring authorities' existing Green Belt Assessments

Green Belt Assessments for the authorities that are adjacent to the Staffordshire's administrative boundary have been reviewed to establish their general approach and scope and the approach to assessing the five Green Belt purposes. The most recent Green Belt Assessments has been reviewed; where the assessment has been split into Parts 1 and 2 and these have been published in separate reports, both have been reviewed. Table 19 below shows a high-level review of these key elements.

Table 19. Comparative review of Green Belt Assessments in neighbouring authorities

Local Authority and Study Details	Summary of Approach
Birmingham City Council **Birmingham Green Belt Assessment (2025) (Arup)**[130]	**General Approach and Scope** The Green Belt Assessment followed a two-stage approach, assessing both parcels and sites. Through Stage 1, parcels were assessed for their contribution to the five Green Belt purposes, before areas of fundamental importance were identified. Through Stage 2, sites were assessed for their contribution to the five purposes and an assessment of Green Belt harm, which considered the implications of releasing the site, was also undertaken. At both Stage 1 and Stage 2, parcels/sites were assessed as to whether they could be identified as potential grey belt inline with the guidance set out in the Green Belt PPG. **Approach to assessing the five Green Belt purposes** Rating The contribution to the purposes used a four-point qualitative rating system consisting of **Strong, Moderate, Weak** or **No contribution.** Purpose A The large built up area was identified as the West Midlands conurbation, which included Birmingham, Sutton Coldfield, the Black Country and Solihull. No other large built up areas were identified. Purpose B For Purpose B, the West Midlands conurbation was identified as one 'town'. It was recognised that there are likely distinct towns with a different character and identity within the conurbation, however as they form one contiguous urban area they were treated as one town for the purposes of this study. Other neighbouring towns included Bromsgrove, Lichfield, Redditch and Tamworth. The assessment considered whether the assessment area is located with a gap between neighbouring towns, and whether development of such would result in the loss of visual separation or physically reduce the perceived or actual distance between towns. Purpose C For Purpose C, the degree of openness was assessed, which included looking at the existing land use and whether this is inappropriate development in the Green Belt, and whether the assessment area was enclosed by existing development. Purpose D

[130] https://www.birmingham.gov.uk/downloads/file/30982/birmingham_green_belt_assessment_-_final_report_2025

Local Authority and Study Details	Summary of Approach
	No historic towns were identified to be assessed in Purpose D. It was noted that there are historic parts of Birmingham however the Green Belt could not be deemed to preserve the setting or special character of these due to the large amount of development between the Conservation Areas and Green Belt. The remaining towns identified in Purpose B were considered to be too distant from Birmingham's Green Belt for this to make any contribution to them, even if they are considered a historic town. Purpose E The performance of the Green Belt against Purpose E was assessed for the entire Birmingham Green Belt, with it concluded that all assessment areas should be assessed as making a moderate contribution.
Black Country Authorities – Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council **Black Country Green Belt Study (2019) (LUC)**[131]	**General Approach and Scope** The Green Belt Study followed a two-stage approach. Stage 1 defined strategic parcels of Green Belt land which drew-out variations in contributions to the five Green Belt purposes. Stage 2 included a more focussed assessment of the potential harm of removing land from the Green Belt. The Study looked at the Green Belt across the four Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton), referred to as the "Black Country Green Belt". **Approach to assessing the five Green Belt purposes** Rating A qualitative scoring system was applied consisting of **Strong, Moderate** and **Weak/No** contribution. Purpose A The large built-up area was identified as the West Midlands conurbation, due to there being visible continuous urban mass that stretched across the authority areas. Cannock, Cheslyn Hay, Great Wyrley and Hednesford was also considered a separate large built-up area. Purpose B For Purpose B, towns included those within the Black Country (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)). Towns outside the Black Country but within close proximity to the study area were also identified. Purpose C Didn't distinguish between different 'degrees' of countryside beyond considering urban influence. Purpose D

[131] https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4i/

Local Authority and Study Details	Summary of Approach
	None of the city or towns were considered to have a special character to which its landscape setting makes sufficient contribution to warrant assessment. There were no other historic towns that were considered close enough to the Black Country Green Belt for it to be considered to make more than a weak contribution to its setting or special character in Green Belt terms. Purpose E Concluded that all of the Green Belt land within the Black Country makes a contribution to Purpose E, it is not possible to determine this on a parcel by parcel basis. It was concluded that all Green Belt land within the Black Country makes a strong contribution to this purpose.
Bromsgrove District Council **Green Belt Purposes Assessment: Part 1 (2019) (Bromsgrove District Council)**[132] **Part Two Green Belt Study (2022) (LUC)**[133]	**General Approach and Scope** The Green Belt Assessment was split into two parts, Part 1 assessed the entire Bromsgrove Green Belt against the NPPF purposes. Part 2 focussed on assessing specific sites against the NPPF purposes and completed a Green Belt Harm Assessment. The assessment focussed on only the Green Belt within the District. **Approach to assessing the five Green Belt purposes** The approach to some of the purpose assessment differed between the Part 1 and Part 2 assessment, where this is the case, this has been acknowledged below. Rating In Part 1: A qualitative approach was taken to rating the purposes of **Strong, Moderate, Weak** or **to No contribution.** In Part 2: A qualitative approach was also taken, but depending on the purpose the assessment the terminology differed between "**Potential harm to the purpose"** or **"No potential harm to the purpose"**, or **"Higher potential harm to the purpose"** or **"Lower potential harm to the purpose"**. Purpose A In Part 1: Large built up areas were defined as those nearby towns and areas which are part of the Birmingham conurbation and any other nearby freestanding settlements. These were set out as Bromsgrove Town, Birmingham, Solihull, Halesowen, Stourbridge and Redditch, with Cofton Hackett/Longbridge and Rubery being considered as part of the conurbation. In Part 2: Only the West Midlands conurbation was considered to be a large built up area.

[132] https://www.bromsgrove.gov.uk/media/bkwpvwr5/green-belt-purposes-part-one-assessment-with-app-1-and-2-sept-2019.pdf

[133] https://www.bromsgrove.gov.uk/council/policy/planning-policies-and-other-information/bromsgrove-district-local-plan/evidence-base/green-belt-study-part-2/https://www.bromsgrove.gov.uk/media/gaun43ul/2023-05-26-bromsgrove-stage-2-green-belt-study-report-final-220607-reduced.pdf

Local Authority and Study Details	Summary of Approach
	Purpose B In Part 1: Towns were defined as all the settlements currently excluded from the Green Belt within Bromsgrove District plus settlements outside of the District of similar or larger size where there appears to be a relationship with the District. In Part 2: Only the West Midlands conurbation, the 'main towns' and 'large settlements' listed within Policy BDP2 (Settlement Hierarchy) of the Bromsgrove Development Plan and adjacent areas as towns. Purpose C For Purpose C it was considered that key to the countryside is the sense of openness, which can be defined as the absence of built development or other urbanising elements. Purpose D It was considered that the only area within Bromsgrove which this purpose could relate to is the historic core of Bromsgrove town, located in the Town Centre. However, as there is a considerable amount of development located between the historic core of the Conservation Area and the Green Belt it was considered that in reality this purpose would have very little relevance when assessment the land parcels and was therefore not considered in this assessment. Purpose E In Part 1: For this purpose, it was considered that it would be difficult to establish the role of one specific land parcel over another in assisting urban regeneration or to attribute specific evidence. Therefore, the land parcels could all be rated equally or not at all, but neither approach would provide any real analysis. Therefore, this purpose was not considered in this assessment. In Part 2: Agreed the approach that Green Belt land within Bromsgrove District is considered to contribute on an equal basis to this purpose. Concluded that the release of Green Belt land has the **Potential to harm** Purpose E.
North Warwickshire Borough Council **Coventry and Warwickshire Joint Green Belt Study – Stage 2 (2016) (LUC)**[134]	**General Approach and Scope** The study assessed the Green Belt of the land within the administrative areas of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough, Stratford-on-Avon District Council and Warwick District Council. The Green Belt was assessed against the five NPPF Green Belt purposes **Approach to assessing the five Green Belt purposes** Rating

[134] https://www.northwarks.gov.uk/downloads/file/93/greenbelt-study-2016

Local Authority and Study Details	Summary of Approach
	A numerical scoring system was used of between **0-4**. Purpose A It was unclear from the study report what was defined as the large built-up areas for this purpose to be assessed against. Purpose B It was unclear from the study report what was defined as the towns for this purpose to be assessed against. Purpose C Countryside was defined as land which is rural in character with urbanising features including built development that is not in keeping with the countryside. Purpose D The historic towns of Alcester, Birmingham, Coleshill, Henley-in-Arden, Redditch, Stratford and Tamworth were considered in this assessment. These were agreed by the Steering Group. Purpose E All parcels were each given score of **4** for Purpose E on the basis that all Green Belt makes a strategic contribution to this purpose.
Shropshire Council **Green Belt Assessment (2017)**[135]	**General Approach and Scope** The study assessed areas of Green Belt in east Shropshire against the five purposes of the Green Belt, as outlined in the NPPF. A two stage process was followed, defining and assessing large parcels in the first stage, with the results being used to define smaller parcels for the Stage 2 assessment. **Approach to assessing the five Green Belt purposes** Rating For Purposes A-D, parcels were rated on a scale of no contribution to strong contribution. Purpose A The defined large built up area was Telford and the West Midlands conurbation, although of these, only Telford is adjacent to Green Belt in Shropshire. Therefore, only parcels adjacent to Telford (within the Shropshire Green Belt) were considered for Purpose A.

[135] https://www.shropshire.gov.uk/media/7269/shropshire-green-belt-assessment.pdf

Local Authority and Study Details	Summary of Approach
	Purpose B The towns considered for the Assessment included the Tier 2 settlements (Market Towns and Key Centres) identified in the adopted Shropshire Core Strategy and SAMDev Plan. These included Albrighton, Bridgnorth, Highley, and Shifnal. Telford was also considered a town despite not lying within Shropshire as its urban edge lies adjacent to the Green Belt. Similarly, Bridgnorth and Highly were included as they are adjacent it or in close proximity to the Green Belt. Codsall in South Staffordshire, Kidderminster in Wyre Forest and the metropolitan area of Birmingham, Wolverhampton, Stourbridge and Dudley were also included. Purpose C To assess the parcels' contribution to the countryside, the characteristics of the countryside were considered, including a lack of development and land uses associated with the countryside, as well as the extent to which the parcels relate to the adjacent settlement and wider countryside. Purpose D Conservation Areas were used to identify historic towns and settlements, with the Central Marches Historic Towns Survey also used as a cross check. The assessment considered several historic settlements near the Green Belt, including those within the Severn Gorge and Broseley Conservation Areas, as well as towns in South Staffordshire, with Telford noted for incorporating multiple historic areas. Purpose E Parcels were not assessed for Purpose E, as it was considered that all parcels make an equally significant contribution to this purpose.
Wyre Forest District Council **Green Belt Review Strategic Analysis (2016)**[136] **Green Belt Review Part II: Analysis of Sites Update (2018)**[137]	**General Analysis and Scope** The Green Belt Study is not a Green Belt Review as it was not made through the Local Plan Review process, and therefore it does not formally change or review Green Belt boundaries. The Study is not a full review and therefore is a high-level analysis of each parcel. Part I is a strategic review of the Green Belt purposes, assessing the character of the role of the villages within the Green Belt. Part II considered the relationship between the potential development sites for the emerging Local Plan and the Green Belt and looked to determine the likely impact of site development on the Green Belt purposes, openness and permanence. **Approach to assessing the five Green Belt purposes** Rating

[136] https://archive.wyreforestdc.gov.uk/media/2973292/Wyre-Forest-Green-Belt-Review-Strategic-Analysis-FULL-DOCUMENT-compressed.pdf

[137] https://archive.wyreforestdc.gov.uk/media/3991681/Green-Belt-Review-Part-II-Analysis-of-Sites-May-2018-update.pdf

Local Authority and Study Details	Summary of Approach
	The parcels were assessed as to whether they made a Significant Contribution (SC), a Contribution (C), or a Limited Contribution (LC) to the Green Belt purposes. This rating system was used for all purposes. Purpose A The Study considers whether the parcel plays a role in preventing ribbon development, particularly along major transport corridors, and/or whether the Green Belt already been compromised by ribbon development. It also considers the extent to which the parcel is considered to be open. It is unclear from the study report what was defined as the large built-up areas for this purpose to be assessed against. Purpose B The Study considered Kidderminster, Stourport, Bewdley, Stourbridge and to a lesser extent Bromsgrove as 'towns' for the Purpose B assessment and considered the extent that the Green Belt prevents the actual or perceived merge of towns and/or parts thereof. Part I used a more quantitative approach to the Purpose B assessment, considering the actual gap between the towns (<1km, 1-2km, >2km), whereas Part II did not use a defined scale based off actual distances. Purpose C For Purpose C, the assessment looked at whether the parcel had been affected by the encroachment of urbanising development, the ability of the boundaries to contain development, and if there are existing natural or man-made features that would contain development. Purpose D Historic towns were identified by Conservation Areas and Listed Buildings, and how the Green Belt contributes to the setting of the towns. These included Bewdley, Kidderminster and Stourport. Purpose E In Part I of the assessment (a strategic study), Purpose E was rated by the role the parcel makes in combination with adjacent parcel to encouraging urban regeneration. Whilst most of the Green Belt made a 'limited contribution' to this Purpose, there were some areas of land that made a 'contribution' between Kidderminster and Stourport here there was some previously developed land. Part II did not assess Purpose E, concluding that it is considered this is a strategic function and not applicable at the site-specific scale.

Appendix B – Overall Assessment Guidance

The following guidance has been used to determine the overall assessment for each assessment area. Note, this is example guidance that will be followed when completing the overall assessment and does not reflect any specific scenarios presented within the Staffordshire GBA.

1) Where there is a 4 / 1 split – the majority contribution should always be applied, unless the majority is 'no contribution' in which case, the overall should be 'weak'.

Example:

Moderate	Moderate	Moderate	No	Moderate	Moderate

Exception:

No	No	No	No	Moderate	Weak

2) Where there is a 3 / 2 split – the majority contribution should always be applied unless the '2' contributions are 'strong'. In this case, the overall would be 'strong'. The exception to this would be if the majority was 'no', in this case the overall would be the minority or if the '2' was moderate, the contribution would be weak given that this is between the two levels.

Example:

Moderate	Moderate	Weak	Weak	Moderate	Moderate

Exception:

Strong	Strong	Moderate	Moderate	Moderate	Strong
No	No	No	Moderate	Moderate	Weak

3) Where there is a 3 / 1 / 1 split – the majority contribution should always be applied unless one of the minority contributions is 'strong'. In this case, professional judgement should be applied (see below). Where the majority is 'no', the middle category from the split should be the overall.

Example:

Weak	No	Moderate	Moderate	Moderate	Moderate

Exception:

No	No	Strong	No	Moderate	Apply professional judgement
Strong	Moderate	Moderate	No	Moderate	Apply professional judgement
No	No	Weak	No	Moderate	Weak

4) Where there is a 2 / 2 / 1 split – the contribution to be applied depends on what the split and the minority leans towards. For example, where the minority contribution is 'no', the lower contribution of the split should be applied. The exception to this is where the minority contribution is 'strong', in which case professional judgement should be applied. Professional judgement is also applied where there are two strong contributions.

Example:

No	Weak	Weak	Moderate	Moderate	Weak
No	No	Weak	Weak	Moderate	Weak
No	No	Moderate	Weak	Moderate	Weak

Exception:

Strong	Moderate	Strong	No	Moderate	Apply professional judgement
Moderate	No	Strong	No	Moderate	Apply professional judgement

5) Where there is a 2 / 1 / 1 / 1 split, professional judgement should always be applied.

Example:

No	Weak	Strong	No	Moderate	Apply professional judgement

Appendix C – Duty to Cooperate Consultation

The Councils sought feedback on the methodology from LPAs who are adjacent to their administrative boundaries and therefore share a Green Belt boundary, and those within the wider Housing Market Area (including the Combined Authority). Stakeholders were able to provide written comments on the draft Methodology. The following authorities provided comments following the consultation period:

- Dudley Metropolitan Borough Council
- Birmingham City Council

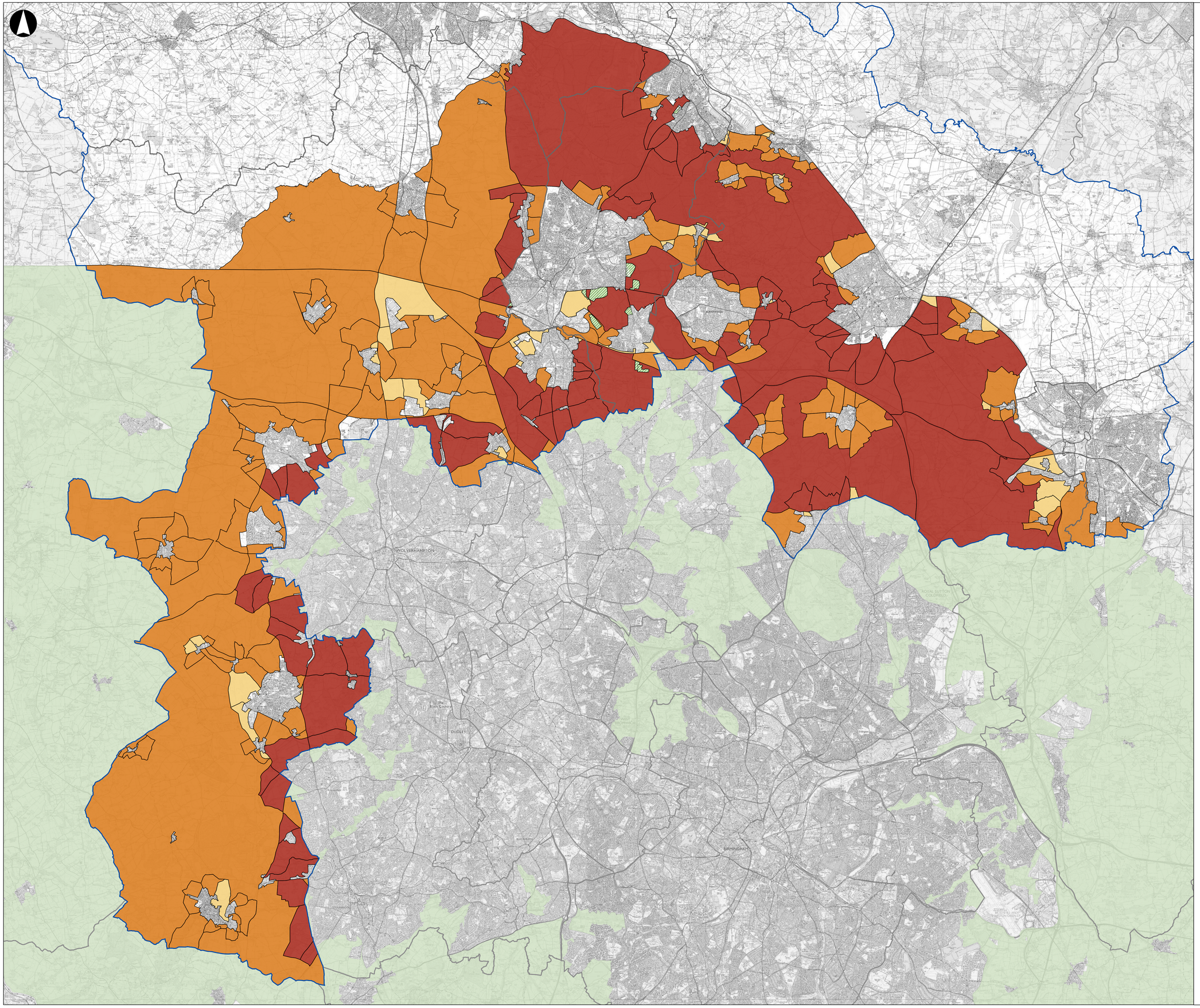
Table 20 presents the consultee responses and details Arup's response and where appropriate, the change made.

Table 20. Duty to Cooperate comments and responses

Consultee	Consultee comments	Response
Dudley Metropolitan Borough Council	Noted that the methodology and report references the latest national planning policy and practice guidance on Green Belt and Grey Belt, including relevant case law implications - this should be kept up to date as the report progresses e.g., at '**A.1.6 Footnote 7 land' and related parts of report which discuss Footnote 7 implications** - it may be worth referencing the current High Court case which is considering the application of Footnote 7 https://www.planningresource.co.uk/article/1930289/high-court-consider-whether-grey-belt-definition-applies-just-proposed-development-whole-site - we understand that the recent South Staffs case and this one potentially have implications for whether grey belt can be 'provisionally' identified i.e., if any Footnote 7 constraints on-site/nearby and it is applied to the land, rather than the development then can't be grey belt regardless of whether results in no significant harm?	Noted. We have checked the recent appeals which consider the implications of the application of footnote 7 constraints. Section 3.4 is up to date as of Nov 2025. We do a high level check of any more recent decisions and consider any potential implications where appropriate.
Dudley Metropolitan Borough Council	We would wish to be consulted in further detail on any specific sites lying on the boundary between Dudley and South Staffordshire that are assessed to ensure cross boundary input and consistency. It would be helpful to see the defined Green Belt parcels prior to/as part of the assessment of these individual parcels.	Noted, however the Duty to Cooperate consultation only focussed on sharing the methodology at this stage. Details will be shared as part of the next public consultation on the Local Plans being prepared by each authority.
Dudley Metropolitan Borough Council	Page 34 Purpose B and footnote 31- recognise that in relation to assessing sites within South Staffs, it does not particularly matter if the urban area of Dudley is identified as specific individual towns or as part of larger town under the wider West Mids conurbation. However, the report should note that the Black Country Green Belt Study (2019) as well as the adopted and emerging Local Plans for Dudley all identified individual 'towns' within the conurbation which have areas of Green Belt separating them to one degree or another namely Dudley, Stourbridge, Brierley Hill and Halesowen. This may therefore be reflected in future local GBAs for Dudley MBC specifically – footnote 31 text needs amending accordingly to	Noted, footnote 31 text has been amended (now footnote 32).

Consultee	Consultee comments	Response
	reflect this commentary. We suggest the last sentence of footnote 31 be removed.	
Dudley Metropolitan Borough Council	Page 35 Table 5- note that the definition of 'towns' differs from the draft WMSGS approach, particularly in relation to the main villages within South Staffordshire- may therefore give different outcomes for this Purpose B, creating some confusion? The methodology could include a reference in the study introduction to any differences arising being due to difference in scale of studies, and the WMSGS is not a full GBA?	Noted. This methodology and assessment is being conducted within the scope of the initial brief and therefore we have agreed the approach to identifying towns within this Green Belt Assessment with the commissioning authorities.
Dudley Metropolitan Borough Council	Page 41- could the explanation regarding the West Mids conurbation be expanded upon e.g., there are Conservation Areas within Dudley MBC in proximity of South Staffordshire, albeit not directly adjoining Green Belt land (e.g., around Wollaston area)- the West Mids conurbation is classed as a 'town' in the study. Is it the physical separation/distance of the assessed parcels from these historic areas that has informed the conclusion? The draft study has expanded upon the reasoning for the Kidderminster example- similar approach needed for West Mids.	Noted, additional text has been added to clarify this position.
Birmingham City Council	The only thing I have noted which is very, very minor, is the second paragraph under 3.5.2 (page 22) which says that *"It should be noted that all of these GBA were undertaken before the NPPF and PPG updates. Therefore, some of the approaches, particularly around villages assessed in Purpose B and D are now considered outdated"*. This is incorrect as our GBA was completed very recently. I think this is just old text that Arup have recycled from their previous work and which they have forgotten to remove or update from this version.	Noted, this text has been amended to reflect that the Birmingham Green Belt Assessment has been completed since the NPPF and PPG updates.

Appendix D – Study wide assessment maps



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Coordinate System: British National Grid

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Metres
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Rev	Date	By	Chkd	Appd	Authd
01	07/04/2026	MM	CR	AO	--

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Client
Staffordshire authorities

Project Name
Staffordshire Green Belt Assessment

Drawing Title
Study wide - Assessment outcomes

Overall assessment

Scale at A1
1:74,000

Role
Planning

Suitability
Final

Project Number
313903-00

Rev
P01

Drawing Number
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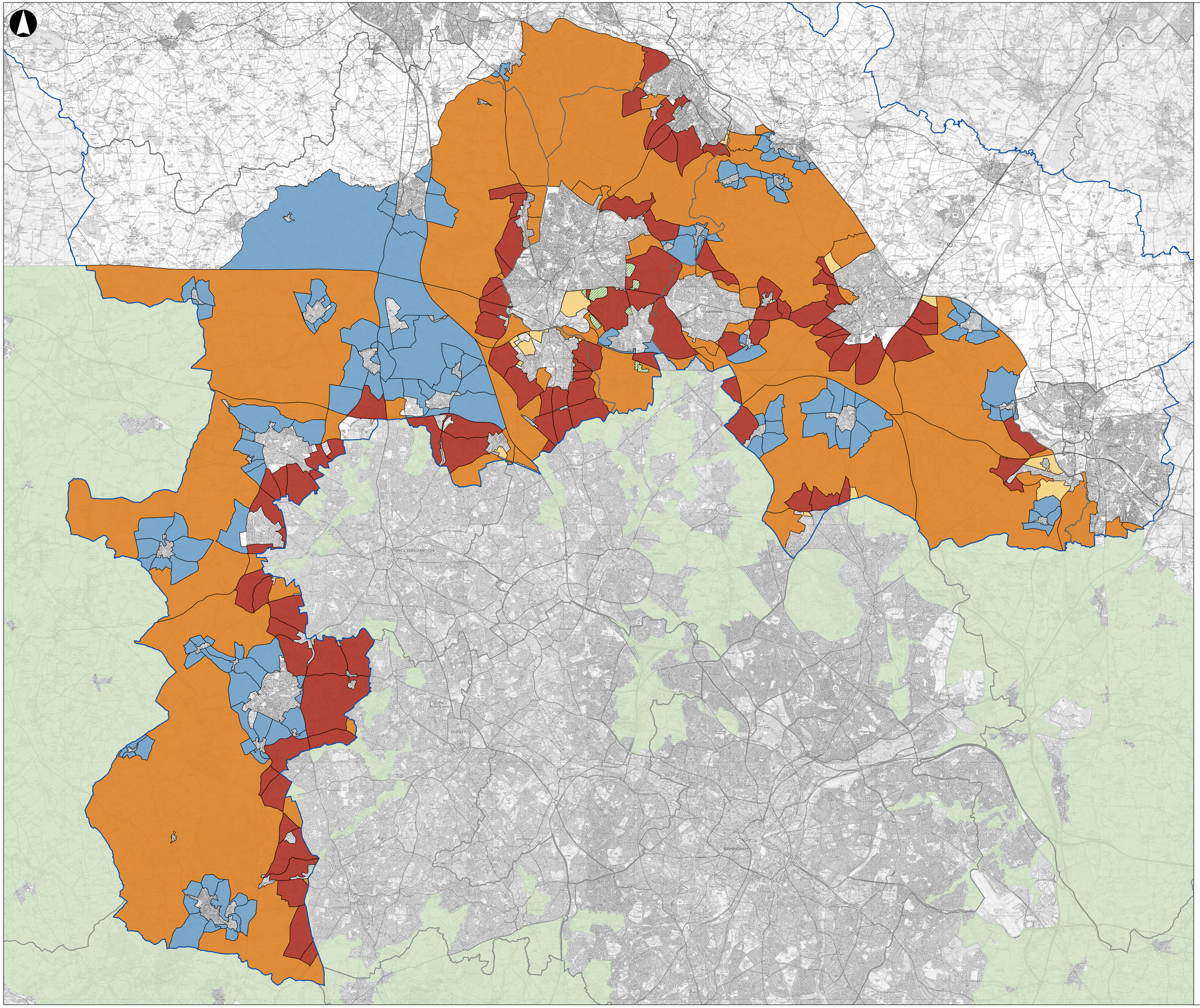

Study area
Local Authority boundaries
West Midlands Green Belt
Cannock Chase Green Belt release sites

Purpose A
Strong
Moderate
Weak
No

Coordinate System: British National Grid

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Metres
0 2,000 4,000 8,000

Rev	Date	By	Chkd	Appd	Authd
01	07/04/2026	MM	CR	AO	--

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Project Name
Staffordshire Green Belt Assessment

Drawing Title
Study wide - Assessment outcomes

Purpose A

Scale at A1
1:74,000

Role
Planning

Suitability
Final

Project Number
313903-00

Rev
P01

Drawing Number
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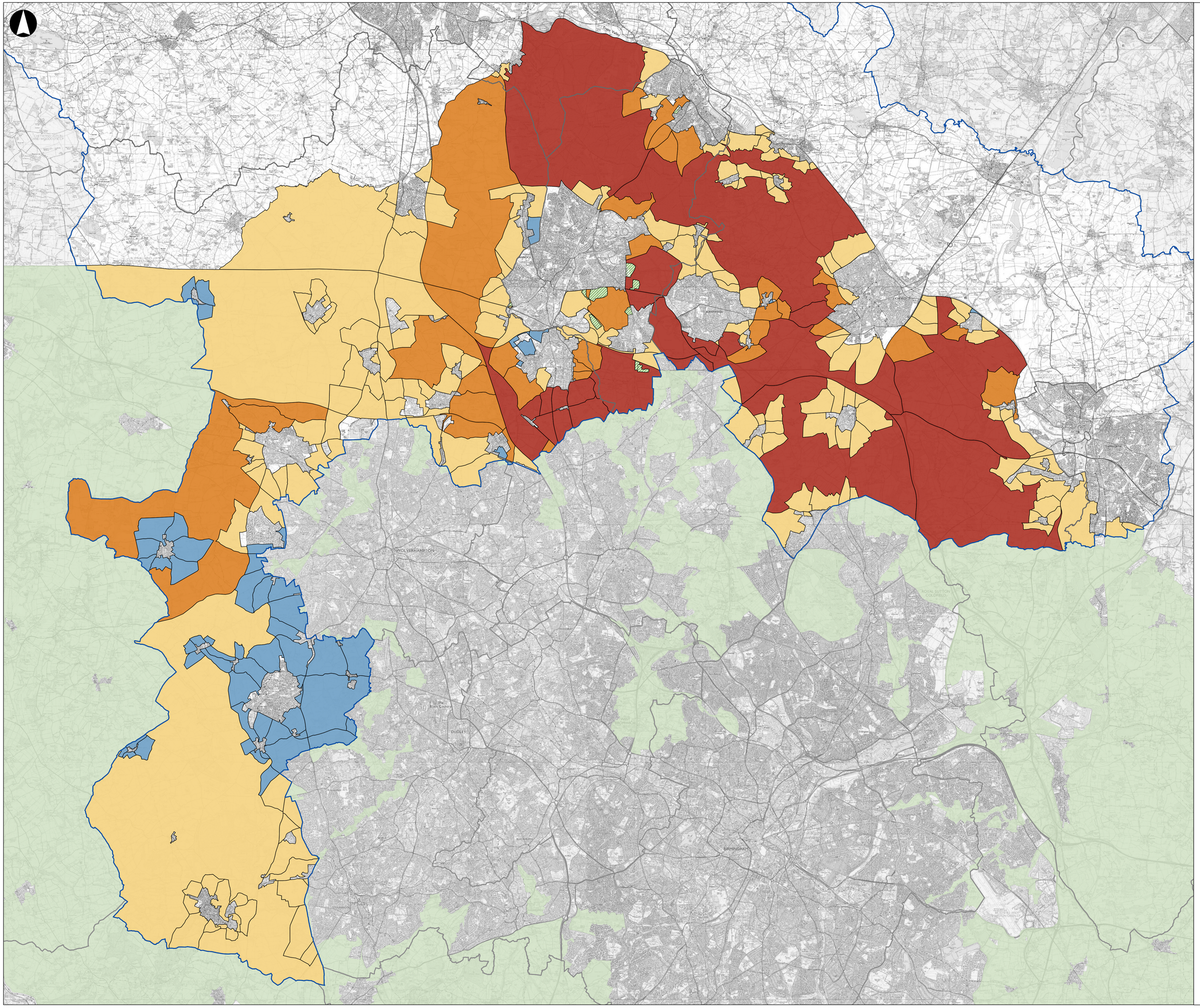

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- Study area
- Local Authority boundaries
- West Midlands Green Belt
- Cannock Chase Green Belt release sites

Purpose B

- Strong
- Moderate
- Weak
- No

Coordinate System: British National Grid

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Metres

0 2,000 4,000 8,000

Rev	Date	By	Chkd	Appd	Authd
01	07/04/2026	MM	CR	AO	--

ARUP

One Centenary Way
Birmingham B3 3AY
Tel +44 121 213 3000
www.arup.com

Client

Staffordshire authorities

Project Name

Staffordshire Green Belt Assessment

Drawing Title

Study wide - Assessment outcomes

Purpose B

Scale at A1

1:74,000

Role

Planning

Suitability

Final

Project Number

313903-00

Rev

P01

Drawing Number

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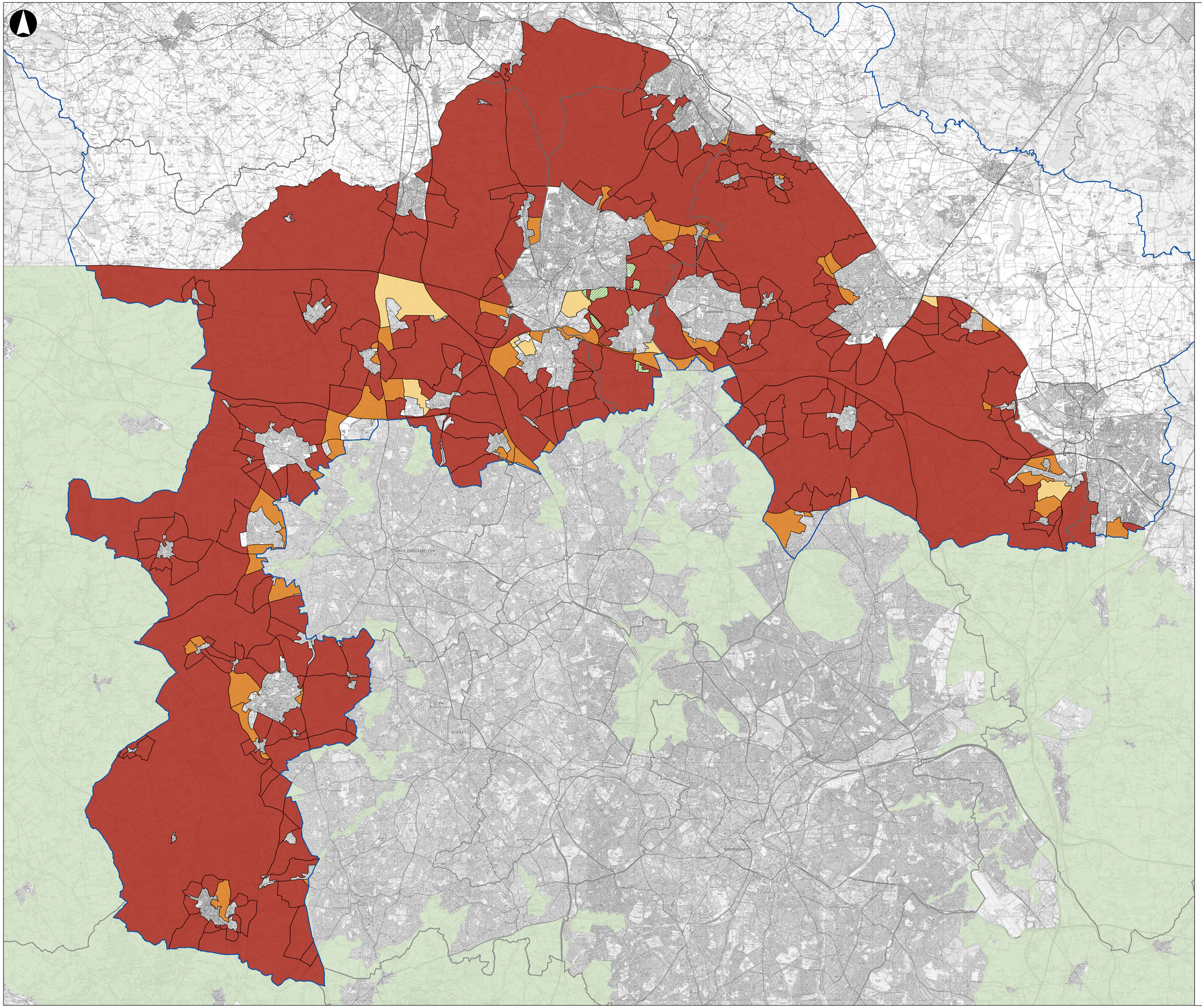

A1

07/04/2026 10:40

- Study area
- Local Authority boundaries
- West Midlands Green Belt
- Cannock Chase Green Belt release sites

Purpose C

- Strong
- Moderate
- Weak
- No

Coordinate System: British National Grid

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Metres

0 2,000 4,000 8,000

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Client

Staffordshire authorities

Project Name

Staffordshire Green Belt Assessment

Drawing Title

Study wide - Assessment outcomes

Purpose C

Scale at A1

1:74,000

Role

Planning

Suitability

Final

Project Number

313903-00

Rev

P01

Drawing Number

--

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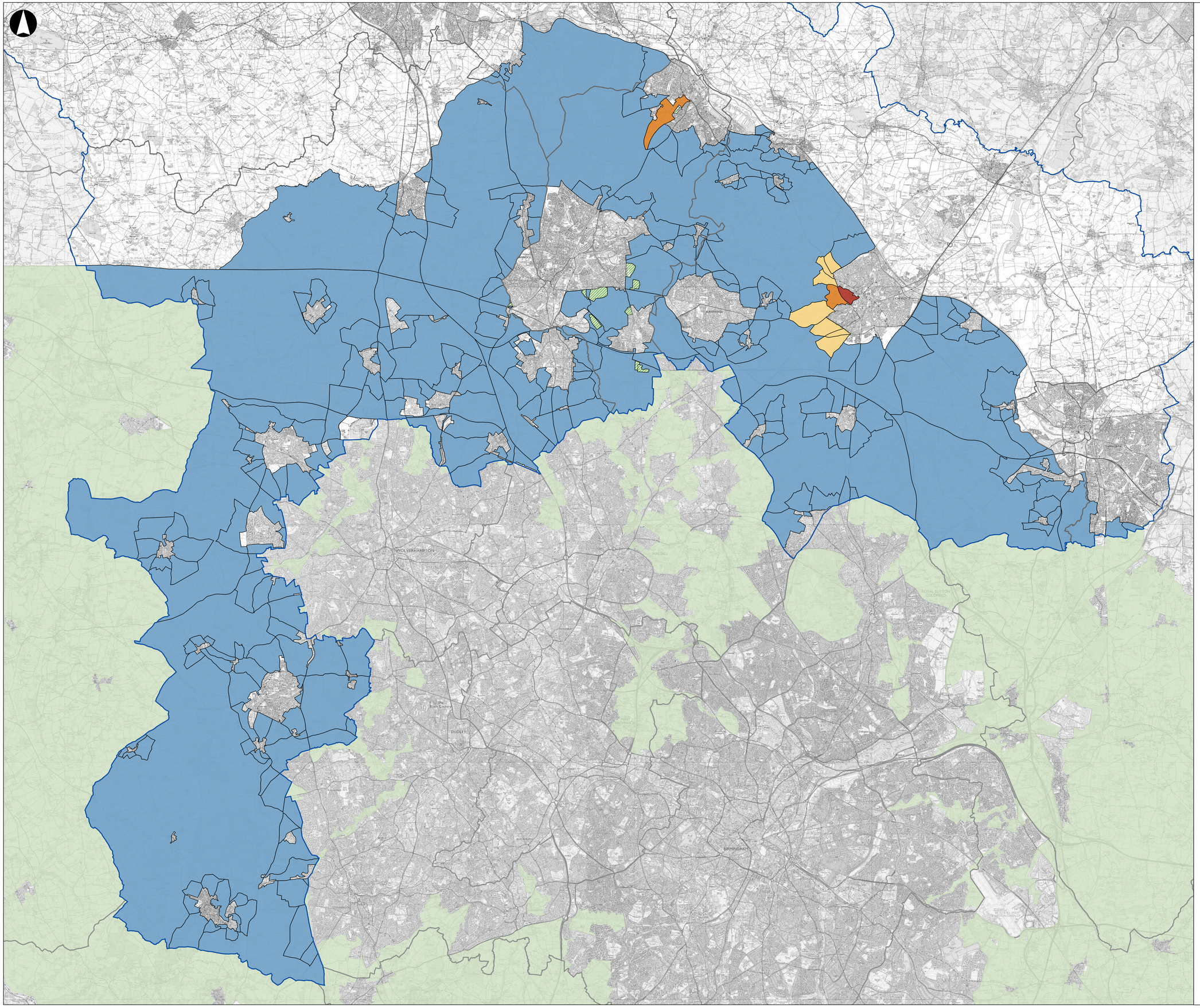
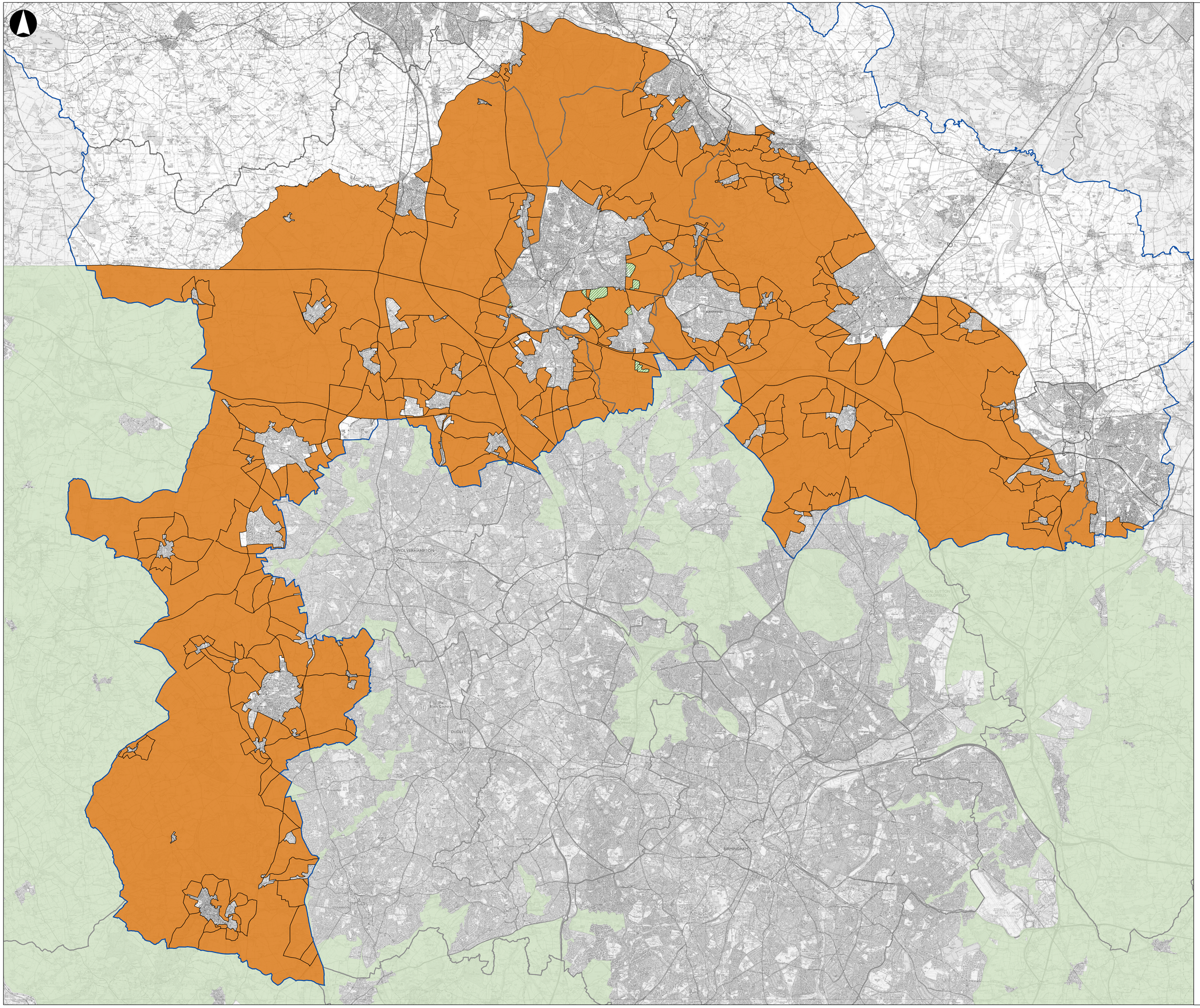

Study area
Local Authority boundaries
West Midlands Green Belt
Cannock Chase Green Belt release sites
Purpose D
Strong
Moderate
Weak
No
WOLVERHAMPTON
DUDLEY
BIRMINGHAM
CANNOCK
RUGELEY
LICHFIELD
TAMWORTH
SUTTON COLDFIELD
ROYAL SUTTON COLDFIELD
KIDDERMINSTER
STOURBRIDGE
HALESOWEN
WALSALL
BROWNHILLS
BURNTWOOD
ARMITAGE
ABBOTS BROMLEY
ALREWAS
KINGSBURY
WATER ORTON
CURDWORTH
SHUSTOKE
CASTLE BROMWICH
SHIRLEY
SOLIHULL
KNOWLE
DORRIDGE
HOCKLEY HEATH
HENLEY-IN-ARDEN
BEAUDESERT
HAMPTON-IN-ARDEN
MERIDEN
BALSALL COMMON
BERKSWELL
TEMPLE BALSALL
HAMPTON LOVETT
HAGLEY
STOURPORT-ON-SEVERN
BEWDLEY
KINVER
WOMBOURNE
SEDGLEY
GORNAL
COSELEY
TIPTON
WEDNESBURY
WEST BROMWICH
OLDBURY
BLACKHEATH
HALESOWEN
ROWLEY REGIS
SMETHWICK
HANDSWORTH
ASTON
ERDINGTON
KINGSTANDING
SUTTON COLDFIELD
ROYAL SUTTON COLDFIELD
FOUR OAKS
MIDDLETON
CASTLE VALE
GREAT BARR
PERRY BARR
HODGE HILL
ALUM ROCK
SHELDON
YARDLEY
STECHFORD
HALL GREEN
SPARKHILL
SPARKBROOK
BORDESLEY GREEN
ACOCKS GREEN
TYSELEY
HAY MILLS
SOUTH YARDLEY
KINGS HEATH
MOSELEY
KINGS NORTON
NORTHFIELD
LONGBRIDGE
WEST HEATH
BOURNVILLE
SELLY OAK
EDGBASTON
HARBORNE
QUINTON
BARNSLEY
WOODGATE VALLEY
CLENT HILLS
LICKEY HILLS
TURNER'S HILL
LEASOWES
THE BLACK COUNTRY
TAME VALLEY
FRANKLEY RESERVOIRS
CHASEWATER
CANNOCK CHASE
SHUGBOROUGH
CANNOCK CHASE AONB
SUTTON PARK
SUTTON CHASE
SUTTON PARK AND CHASE
SUTTON PARK AND CHASE AONB
SHERWOOD FOREST
SHERWOOD FOREST REGIONAL PARK
PEAK DISTRICT
PEAK DISTRICT NATIONAL PARK
CHATSWORTH
DERBYSHIRE DALES
DERBYSHIRE DALES NATIONAL NATURE RESERVE
PEAK DISTRICT
DARK PEAK
WHITE PEAK
DERWENT VALLEY
DERWENT VALLEY MILLS
DERWENT VALLEY MILLS WORLD HERITAGE SITE
DERWENT VALLEY
DERWENT VALLEY
DERWENT VALLEY



A1

07/04/2026 11:10

- Study area
- Local Authority boundaries
- West Midlands Green Belt
- Cannock Chase Green Belt release sites

Purpose E

- Moderate

Coordinate System: British National Grid

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Metres

0 2,000 4,000 8,000

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Client

Staffordshire authorities

Project Name

Staffordshire Green Belt Assessment

Drawing Title

Study wide - Assessment outcomes

Purpose E

Scale at A1

1:74,000

Role

Planning

Suitability

Final

Project Number

313903-00

Rev

P01

Drawing Number

--

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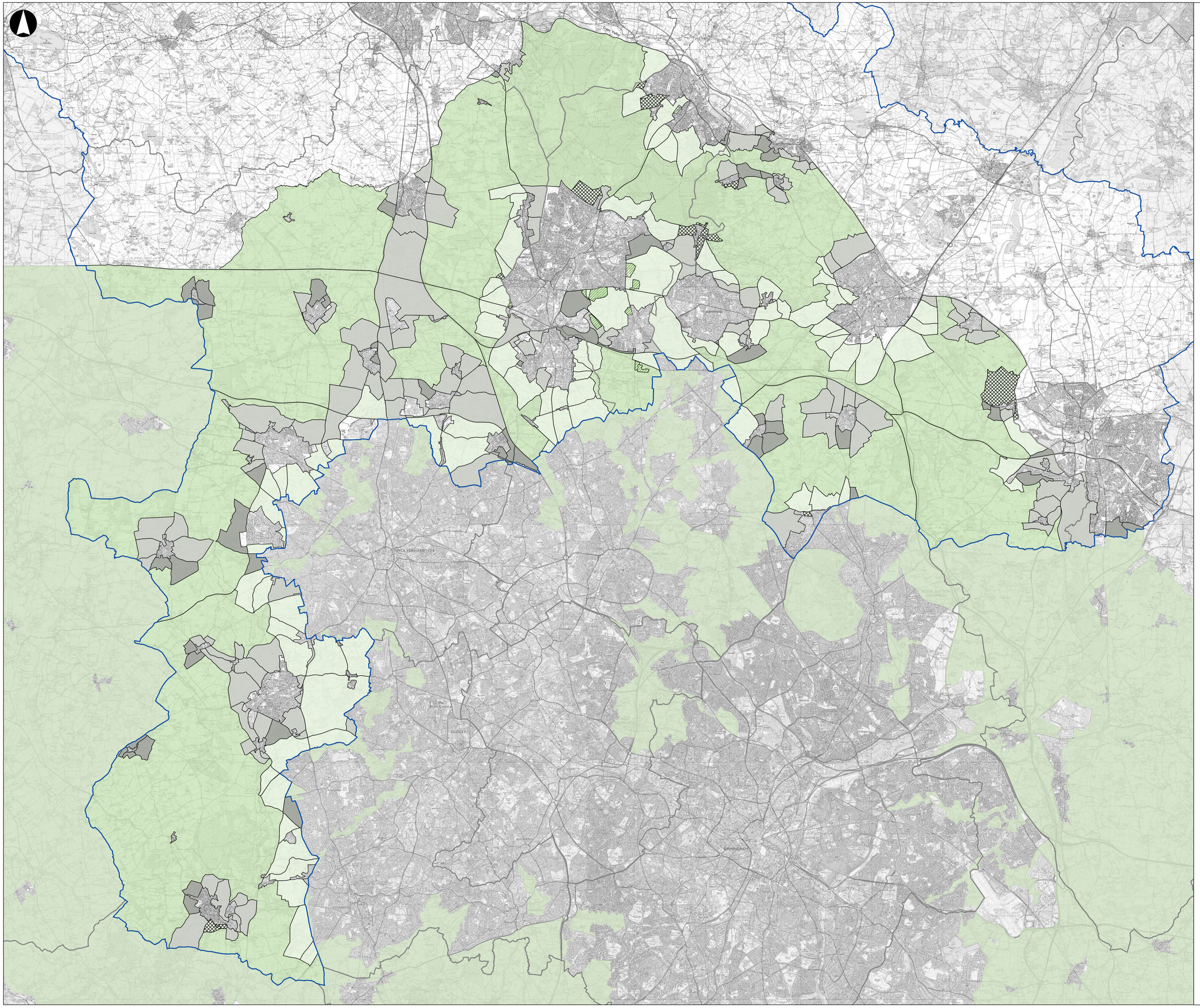

A1

28/04/2026 17:49

Coordinate System: British National Grid

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Metres
0 2,000 4,000 8,000

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Client
Staffordshire authorities

Project Name
Staffordshire Green Belt Assessment

Drawing Title
Study wide - Assessment outcomes

Potential grey belt

Scale at A1
1:74,000

Role
Planning

Suitability
Final

Project Number
313903-00

Rev
P01

Drawing Number
--

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