

LAND EAST WIMBLEBURY ROAD, CANNOCK CHASE DISTRICT

Representations to the Cannock Chase Local Plan Review - Preferred
Options 2021

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1 INTRODUCTION

- 1.1 These representations have been prepared on behalf of Taylor Wimpey UK Ltd (TW) with respect to their interests at Land East of Wimblebury Road. The comments set out in this submission relate to the Cannock Chase Local Plan Review (CCLPR) Preferred Options consultation.
- 1.2 TW has been engaged in the CCLPR throughout the process and has submitted the above site for consideration by the Council as a potential housing allocation in the plan. It should be noted that TW's land interests at Wimblebury Road, were previously promoted by planning consultancy Lichfields. Going forward RPS Consulting Services Ltd (RPS) will be promoting the site on behalf of TW. It should also be noted that further technical work is being prepared for the site and will be submitted along with an up-dated Vision Document in advance of the Council's consideration of, and consultation on the Regulation 19 consultation.
- 1.3 The representations have been structured around two main topics, housing, and Green Belt, as these are most pertinent to the interests TW have in the CCLPR. The submission also refers to a separate Green Belt Assessment (GBA) in respect to the land parcels being promoted by Taylor Wimpey, and this is appended to this submission (**Appendix 1**).
- 1.4 On receipt of this submission, TW would welcome continued discussion regarding the emerging proposals in the CCLPR in order that a suitable scheme can, at a future point, be brought forward in a timely manner.

2 LAND EAST OF WIMBLEBURY ROAD, CANNOCK CHASE DISTRICT

Extent of Land

- 2.1 As the Council are aware, Taylor Wimpey (TW) are promoting the site which comprises the land proposed for allocation in the CCLPR (SH2) 'Land East of Wimblebury Road' for 410 dwellings (the 'Site'). TW is therefore committed to bringing forward the Site through the plan-led process and is willing to work with the Council on preparing an appropriate policy framework that can guide development on the site.
- 2.2 TW therefore welcomes the Council's decision to propose the allocation of the site in the CCLPR. The site allocation comprises land that was previously safeguarded in the 1997 Local Plan and which was also similarly identified in the Cannock Chase Core Strategy adopted in 2014 as safeguarded land, as well as additional parcel of land described as 'East of Wimblebury Road' which lies to the east of the safeguarded land.
- 2.3 The plan below (Figure 2.1) illustrates the extent of all the land under the control of TW. The extent of land under TW control is far greater than that which relates to the site allocation alone. This is significant as it has implications for proposals set out later in this submission (see chapter 4) regarding proposals for potential additional safeguarded land adjacent to the site allocation which forms part of the land under their control.

Figure 2.1 TW Land Control Plan – Land East of Wimblebury Road



2.4 Taylor Wimpey has also commissioned new evidence to inform a revised vision and masterplan for the Site. As indicated above, this will comprise a Vision Document, which will provide greater detail on scale and nature of the proposals as well address, as far as practicable, the known technical issues relating to the site. At this stage, an updated indicative masterplan for the site allocation, and adjacent land (proposed for safeguarding in the CCLPR) is set out below and attached as Appendix 2.

Figure 2.2 Illustrative Masterplan for Land East of Wimblebury Road



2.5 For clarification, the solid red line shown above relates to the whole of proposed site allocation (SH2). The hatched line relates to the additional land proposed for release and safeguarding in the CCLPR to meet development needs beyond the plan period.

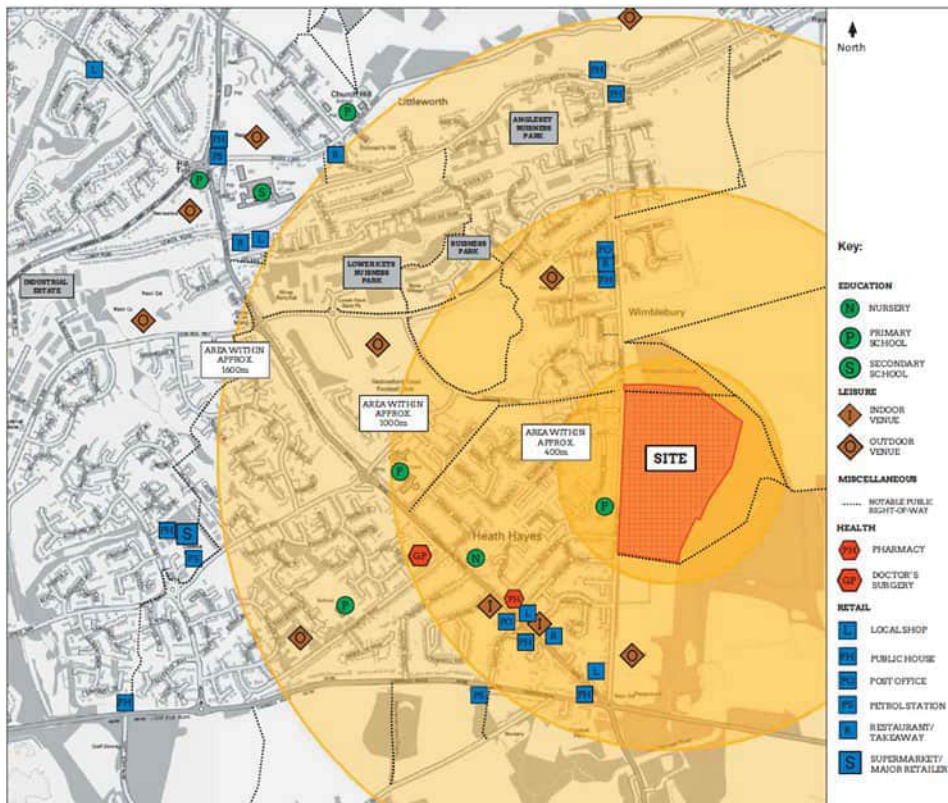
Promoting a Sustainable Development

2.6 The Site is located on the edge of the District’s largest urban area – Cannock/Hednesford/Heath Hayes. As the largest settlement in the District, there are several services and amenities in close

proximity to the site. The Sustainability Plan below (Figure 2.3 below) shows the location of these in relation to the site.

2.7 Public transport services are present along Wimblebury Road, Melbourne Road and Hobart Road (19, 20 and 61 services) to the west of the site, providing access to Cannock and Lichfield every 30-60 minutes, Monday to Saturday. The majority of the site is within 400m of bus stops for these services and is therefore located within a suitable walking distance with a good level of services available.

Figure 2.3 Sustainability Plan – Site environs



2.8 In addition, other services in the area include bus routes 3, 3A, 60, 61A and 835 providing twice hourly services to Walsall, Lichfield, and a daily rush hour service to and from Stafford. On this basis, the Site represents a sustainable location in accordance with the NPPF (paragraph 8).

Site Deliverability

2.9 The Site is wholly within the control of a national housebuilder, who has considerable experience of delivering houses within this area and the wider West Midlands. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing.

2.10 The Site is considered to be suitable for residential development. In summary, the Site:

- Is in close proximity to a range of local services and facilities;
- has no technical or environmental constraints that prevent delivery; and

- has strong transport links locally and further afield.

2.11 TW can therefore confirm that the development of the site is economically viable and is confident that residential development can be achieved within the first five years of the plan period.

2.12 There is therefore an excellent prospect of the site being delivered in the short-term and could, if needed, be brought forward within the first five years of the plan period.

3 REPRESENTATIONS ON THE HOUSING POLICIES

Preferred Option Policy S03.1 Provision for New Homes

Question 10: Do you agree that the amount of housing proposed will meet the local needs of Cannock Chase District as required by the standard methodology?

- 3.1 RPS is broadly supportive of the overall approach to the identification of land to meet the local needs of the District based on the standard method. Nonetheless, RPS notes that the Council cannot currently demonstrate a five-year supply of deliverable land (calculated as 4.8 years in Table 8 of the SHLAA December 2020 report) as at April 2020.
- 3.2 On this basis, any reference to housing targets and site allocation capacities should be expressed as 'minima' rather than 'approximate'. RPS notes that Policy SO3.1 makes provision for a '*minimum of 5,516 dwellings*' and so, for consistency, this qualification should be applied to new site allocations. This will ensure greater opportunity for the Council to meet its housing needs over the plan period.

Question 11 Do you agree that provision should be made to meet the unmet needs of neighbouring areas?

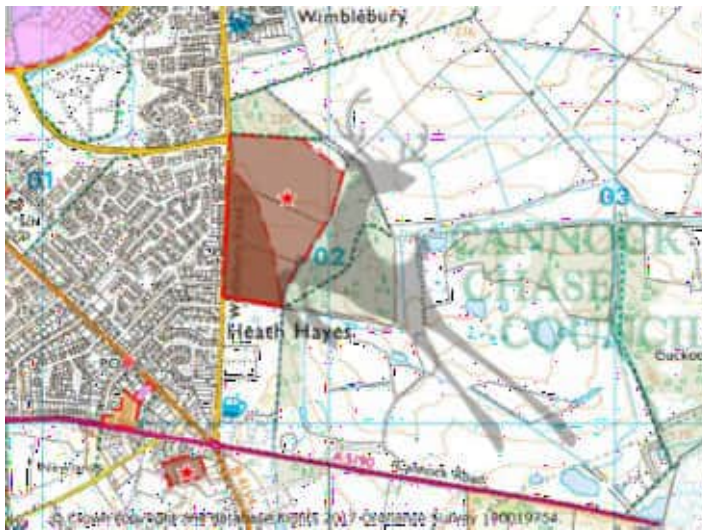
- 3.3 In principle, yes Cannock Chase should make a contribution towards meeting the unmet needs of neighbouring areas. Nonetheless, RPS notes that the CCLPR (at paragraph 6.179) refers to South Staffordshire proposal to an additional provision of 4,500 dwellings to assist the wider Greater Birmingham and Black Country HMA (GBBCHMA). However, at this time, South Staffordshire has only consulted on proposals for 'up to 4,000 dwellings' (as set out at paragraph 5.1 of the South Staffordshire Council Local Plan Review – Spatial Housing Strategy & Infrastructure Delivery October 2019) and has yet to issue any further updated material for consultation since that time.
- 3.4 It is therefore incorrect for the Council to suggest that other areas are taking more of the housing shortfall than what has been formally consulted on in their own plans up to this point. The implication here is that the Council is assuming more of the unmet need is being catered for elsewhere than is actually the case. Consequently, the Council should reconsider the need for additional housing land from the GBBCHMA shortfall to be accommodated in Cannock Chase.
- 3.5 RPS notes that the Council has chosen a preference for taking 500 dwellings (under Growth Policy Option B referred to at paragraph 6.152 of the CCLPR). In light of the comments raised above, RPS contends that Cannock could, and should, consider making a contribution greater than 500 dwellings for the unmet housing numbers emanating from the GBBCHMA.

Question 13 Do you support the proposed allocations of the sites listed in Tables B and C?

Proposed Site Allocation SH2

3.6 Policy SO3.1 of the CCLPR identifies a number of new proposed housing allocations, including SH2 East of Wimblebury Road, with a suggested capacity of approximately 410 dwellings. Site SH2 is listed in Table C of the CCLPR under this policy. The extract below is taken from the policies map shows the boundary of the proposed housing allocation. The star/lighter brown shading indicates land to be removed from the Green Belt. The principle of this allocation is strongly supported.

Figure 3.1 Proposed Strategic Site SH2



3.7 RPS notes that the Cabinet report seeking approval to undertake consultation upon the preferred options version refers to the site having capacity for 260 homes, while text in the preferred options version (at Table C) also refers to a capacity for 150 homes as identified through the Cannock Chase District Development Capacity Study 2021. It is understood that these figures relate to the additional capacity that would be created through the release of additional land from the Green Belt (under SHLAA reference C279), and the capacity of the current safeguarded area respectively (under reference C84). Together, these two figures sum to the 410 dwelling capacity stated in Policy SO3.1: Provision for New Homes.

3.8 RPS supports the proposed allocation of Land East for Wimblebury Road, Cannock (SH2) for 410 dwellings in the CCLPR. The only policy constraint impacting on the site (C279) relates to the current Green Belt designation covering that portion of the site as a whole. The SHLAA 2020 (Appendix 10 and 11) identifies some potential constraints relating these sub-parcels, but these relate more to proximity to those constraints, rather than factors affecting the suitability of the site directly. As highlighted in the previous chapter, Taylor Wimpey has commissioned new evidence, which will address all technical issues relating to the site and thus, will support the contention that site SH2 is suitable for residential development following the release of sub-parcel C279 from the Green Belt.

Question 12 We know the large strategic allocations at South of Lichfield Road and East of Wimblebury Road will need to address the congestion issue at Five Ways island and will require a new primary school, are there any other infrastructure requirements they or any of the other strategic allocations should address?

Infrastructure Issues relating to SH2

- 3.9 RPS acknowledges that any new major residential development is likely to generate a need for additional infrastructure. Such provision should, in principle, meet Regulation 122 of the Community Infrastructure Levy Regulations 2010, which requires that any planning obligations must comply with the three relevant tests, these being: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- 3.10 In relation to the highway impact of the land South of Lichfield Road and East of Wimblebury Road, TW will aim to work closely with the highway authority to ensure an appropriate highway mitigation package is produced and delivered to address congestion issues at Five Ways island and the proportional impact from its proposals.
- 3.11 In relation to the provision of a new primary school at SH2, RPS accepts that such provision could, in principle, meet the first two tests listed above as the new homes provided are likely to generate a demand for additional school places from school aged residents living at the development. RPS assumes that any new school would then be located on SH1 (Land South of Lichfield Road).
- 3.12 The provision of a new school on site SH2 would not be appropriate, given the delivery of 410 homes on the site. This is because the total expected delivery from both sites would total 1,285 dwellings, but the majority would be located on SH1 (875 dwellings). The developable area of SH1 is estimated by the Council to be in the region of 25.5 hectares, more than double the equivalent area available at SH2 (11ha).
- 3.13 On this basis, RPS contend that a fair and equitable solution would be to locate the new primary school on land at SH1, rather than at SH2. By doing so, this would provide the opportunity for the developer of SH2 to help fund the proposal for the new school through developer contributions secured via a section 106 agreement on approval of development at the site. This would, in RPS opinion, address all three tests under the CIL Regulations. Such an approach could also be written into the site-specific policy for the site (see response to question 14 in chapter 5 of this submission).
- 3.14 It is understood this is the intention for SH1, given the masterplanning proposals already presented by the promoter of SH1 is for on-site provision at Land South of Lichfield Road. The policies for both sites therefore need to clarify this position and make it clear that delivery of a new school on SH1, should not prevent delivery of SH2 and in effect financial contribution from TW land interests if appropriate to address school capacity should only be held by the County until such a stage when delivery of the school on SH1 comes forward and this does not in any way hinder delivery of SH2.

4 REPRESENTATIONS ON GREEN BELT POLICIES

Preferred Option Policy SO7.6 Protecting, Conserving and Enhancing the green belt

Question 45 Do you support the preferred policy direction for protecting, conserving and enhancing the Green Belt?

- 4.1 RPS notes that the Council has updated its evidence base on Green Belt with the publication of the 'Green Belt Part 2 Study Report (March 2021). This update provides an assessment of potential harm of releasing smaller areas of land from the Green Belt than those considered in the Part 1 Study issued in 2016. RPS acknowledges the findings of the updated study which, the report states, 'will inform decisions regarding the relative merits of meeting the Council's development needs in different locations' (paragraph 1.7 refers).
- 4.2 However, RPS does have some concerns with aspects of the updated Green Belt evidence presented by the Council. This relates to how the Council has assessed 'distinction' between Green Belt parcels and the urban area; the approach to safeguarded land proposed in Policy SO7.6; and aspects of the site-specific assessment of harm (RPS addresses the latter two points under the response to question 46 below).

Assessment of Distinction

- 4.3 RPS disagree that parcel WI16 is strongly distinct from the urban area. The parcel is partly contained by urban development on its western side where it abuts the inset edge. RPS also note that a crematorium and associated car parking granted approval under application reference CH/18/380 on the 21st of January 2019 has been constructed on the eastern part of the parcel which provides a degree of urbanising influence. As shown on **Figure 4.1** below, taken from Cannock Road in November 2020 during the construction of the Crematorium, there are views into and out of the parcel during winter:

Figure 4.1: View of Crematorium being constructed taken from Cannock Road



- 4.4 Given the points above RPS consider that parcel WI16 to only be of moderate distinction between the parcel and urban area. Accordingly, parcels beyond this including the Site should not be considered as outer areas and should be subject to more detailed site-specific assessment than was undertaken as part of the 2021 LUC Green Belt Assessment.

Preferred Option Policy SO7.7 Amendments to the Green Belt

Question 46 Do you support the preferred policy direction to amendments to the Green Belt?

- 4.5 RPS supports the Council's overall approach which proposes amendments to the Green Belt boundary in order '...to accommodate the growth requirements of the District...' stated in Policy SO7.7. RPS further welcomes the proposed amendment of the Green Belt boundary on land 'East of Wimblebury Road'. This will enable the site (allocated under Policy SO3.1) to be brought forward for residential development for 410 dwellings (which would include the release of the safeguarded land adjacent to west of this site identified in the adopted Core Strategy).
- 4.6 RPS also broadly welcomes the acknowledgment in Policy SO7.7 that further changes to the Green Belt boundary will be made if required and that this would be achieved through a review of the Local Plan.
- 4.7 In this context, RPS supports the view that there is a clear need to amend the adopted Green Belt boundary in order to deliver the spatial strategy and growth requirements of the District. In this regard, the adopted Core Strategy defined the 'Strategic Approach' for accommodating growth in the District up to 2028. This sought to:

"Focus development across the existing settlements of Cannock / Hednesford / Heath Hayes, Norton Canes and Rugeley / Brereton, developing service provision to meet existing balances in housing across the District."

- 4.8 Nonetheless, the preferred policy approach does not demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period by the identification of areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period as set out in the 2019 NPPF (para 139c & 139e). The Council proposes that if required, further changes to the Green Belt boundary will be made through a formal review of the Local Plan policies, or through a Neighbourhood Plan, which potentially undermines the permanence of these boundaries in the long-term contrary to national policy. RPS contends that additional safeguarded land should be identified in accordance with national policy, and this is addressed in subsequent sections of this chapter.

Proposed Amendment - Land East of Wimblebury Road

- 4.9 The land proposed for release from the Green Belt (East of Wimblebury Road) is located on the edge of the District's main urban area (Cannock/Hednesford/Heath Hayes). The adopted spatial strategy (under Policy CP1) states that the urban areas of the District will accommodate most of the new housing and employment growth needed in the future. This is because directing growth here would represent a sustainable approach to accommodating future growth in the District.

4.10 Similarly, the CCLPR seeks to maintain the current strategy for the distribution of growth, stating that:

“In order to meet [these] needs, the Spatial Strategy of the Local Plan proposes that:

- Development will be located in the most sustainable locations, be focussed on the existing urban areas...*
- Housing and employment requirements will be met where possible within urban areas or in accessible and sustainable expansions to the urban areas...*
- Green Belt release in order to provide sufficient land to meet Cannock Chase District’s housing need with an element of flexibility...”*

4.11 Therefore, the release of land East of Wimblebury Road from the Green Belt would accord with the strategic policies of the adopted development plan, as well as the emerging spatial strategy in the CCLPR.

4.12 As part of the emerging CCLPR, there was a clear recognition as part of the Issues and Options Stage consultation that additional housing supply within Cannock Chase District could potentially require Green Belt release (paragraph 7.14 refers). Based on this, a number of policy options for meeting overall housing growth are consulted on, including Green Belt urban extensions to the south of the District at Cannock/Hednesford/Heath Hayes and Norton Canes (‘proportionate dispersal’). The allocation of land to the East of Wimblebury Road for housing development would clearly help meet the identified need for housing and falls within this part of the district.

4.13 Furthermore, it is also significant to note that the Green Belt Study 2016 found that virtually all of the District that is not already developed is designated as Green Belt, so additional development outside of existing urban areas would require the release of Green Belt land (paragraph 1.11 refers)]. The Green Belt Study also noted that “...*the District’s identified supply of brownfield land and other land outside the Green Belt is currently maximised as far as possible...*” (paragraph 1.12 refers]. Whilst it must be acknowledged that SH2, contains and includes safeguarded land, which should come forward for development in advance of any Green Belt land elsewhere in the District.

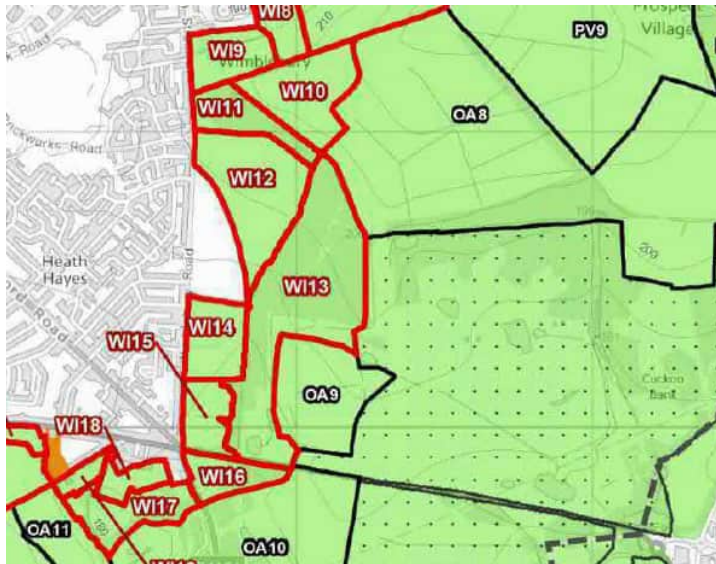
4.14 However, beyond this safeguarded land Green Belt land will need to be released for housing as part of the Local Plan Review to meet the higher housing need figure resulting from the standardised methodology and to accommodate the significant shortfall from neighbouring areas within the GBBCHMA (as highlighted in responses to question 11 above).

4.15 Therefore, RPS contends that these considerations amount to ‘exceptional circumstances’ which justify the release of land East of Wimblebury Road from the Green Belt. Furthermore, releasing the site for development would also accord with the strategic policies of the development plan and the emerging spatial strategy.

Appropriateness of releasing Land East of Wimblebury Road (WI12) from the Green Belt

4.16 Part of the proposed site allocation (SH2) includes land ‘East of Wimblebury Road’ proposed under Policy SO3.1. This parcel of land is identified as ‘WI12’ in the Council’s updated Green Belt study. The study concludes that there would be ‘moderate-high’ harm from releasing the site for development (Table 4.1 of the main report). The extract below in Figure 4.2 shows the location of WI12 in context of the adjacent land parcels.

Figure 4.2 Green Belt Study 2 Report (A1.8) – Wimblebury and Heath Hayes (WI12)



RPS Site-Specific Green Belt Assessment

4.17 In light of the concerns raised above regarding the Council’s updated evidence base and the findings relating to parcel WI12, RPS has undertaken a separate Green Belt Assessment (GBA), which is appended to this submission (**Appendix 1**). In undertaking the assessment, RPS has assessed two parcels based on clear differences in terms of land use and the presence of boundary features consistent with the approach taken in the LUC 2021 Assessment. These are described as ‘Proposed Allocated Land Parcel’ (WI12) and ‘Proposed Safeguarded Land Parcel’. The following sections summarise the findings for these two parcels.

4.18 It should be noted that RPS have not undertaken a separate assessment of the most northern area of land within the TW’s control which forms part of parcel WI11. RPS broadly agree with the findings of the 2021 LUC Assessment that the character of this area, including in particular the fact that it is heavily wooded, means that it is appropriate to assess it as part of parcel WI11. It is suggested that the land within the control of TW that forms part of this parcel could be utilised for environmental enhancements or to provide improved access to the Green Belt as compensatory measures in accordance with paragraph 138 of the NPPF which states:

“Where it has been concluded that it is necessary to release Green Belt land for development, plans ... should also set out ways in which the impact of removing land from the Green Belt can be offset

through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

Assessment of Proposed Allocated Land Parcel

4.19 Figure 4.3 below shows the extent of the Proposed Allocated Land Parcel.

Figure 4.3 Proposed Allocated Land Parcel



4.20 As set out in Appendix 1, RPS do not agree with the conclusions in the LUC 2021 Assessment (on page 54 of Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes) that the overall harm of the release of the Proposed Allocated Land Parcel (WI12) would be ‘Moderate-High’. RPS consider the contributions to the purposes of the Green Belt considered to be made by the parcel to be:

- a relatively strong contributions to Purposes 1 and 3;
- a relatively weak contribution to Purpose 2; and,
- no contribution to purpose 4.

4.21 RPS note that the combination of these contributions and a minor impact on adjacent Green Belt land is not given as an example in the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment. However, it would appear to sit between the examples given for ‘moderate-high’ and ‘moderate’ harm.

4.22 Furthermore, as noted above RPS question the approach to assessing impact on adjacent parcels and note that the characteristics of WI11 such as its heavily wooded nature rising land form, and connection to the SSSI via the heavily wooded WI13 parcel, mean that it is unlikely to be recommended for release from the Green Belt even if the Proposed Allocated Land Parcel is developed and if parcel WI9 and W10 were to be developed. The nature and characteristics of these parcels will therefore ensure that the boundary between these and WI12 can endure in the future.

This would be in accordance with paragraph 136 of the National Planning Policy Framework 2019 (NPPF) which states:

“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”

- 4.23 As such RPS question the contention that increasing the urban containment of WI12 in this particular circumstance would diminish the role of WI11 as an inset edge boundary and suggest therefore that the level of harm of releasing the Proposed Allocated Land Parcel should only at most be assessed as moderate.
- 4.24 RPS also notes that the assessment only considers the ‘potential’ harm of releasing sites, given that there are no detailed layouts referred to in the study. In this regard, the detailed assessment findings for WI12 (see Appendix B of the updated study) recognises that the potential for harm from releasing WI12 could be reduced ‘...by the introduction of new woodland belts and/or small woodlands within WI12, particularly to the northeast. This would form a strong Green Belt boundary and would help to reduce the impact of urbanising containment.’ As highlighted in chapter 2 of this submission, the indicative masterplan shows that a significant proportion of the north-eastern corner of the site will be laid out as public open space, and would thus help to reduce the likelihood of any harm being caused to the wider Green Belt. This would also address the need for compensatory measures required under national policy (NPPF, 2019, paragraph 138). Consequently, this is information that should be considered as part of the assessment.
- 4.25 In addition, RPS also notes that the detailed assessment WI12 does not take into account the fact that the adjacent site to the west (excluded from the Council’s GBA), comprises the only piece of safeguarded land identified in the adopted Core Strategy, and is proposed as a site allocation together with WI12. The previous safeguarding of that site for future development (and which now forms part of site allocation SH2) is clearly a relevant consideration is assessing the contribution and potential harm resulting from the release of WI12, which should be taken into account in the Council’s evidence.
- 4.26 On this basis, RPS suggests that the findings of the updated Green Belt study could be over-stating the potential harm from releasing WI12 from the Green Belt. Consequently, the findings of the separate GBA undertaken by RPS clearly demonstrate that the release of the Proposed Allocated Parcel (comprising WI12) identified in the CCLPR for housing is justified.
- 4.27 Table 4.1 below provides a summary of our assessment of the Proposed Allocated Land Parcel:

Table 4.1 Summary of RPS findings for Proposed Safeguarded Land Parcel

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Wimblebury and Heath Hayes	Release of Proposed Allocated Land Parcel as an expansion of Wimblebury and Heath Hayes	6.1	Relatively Strong	Relatively Weak	Relatively Strong	No	Equal	Moderate

Council’s approach to Safeguarded Land for growth beyond the plan period

4.28 In relation to safeguarded land, RPS notes that the CCLPR under Policy SO7.6, does not propose any new safeguarded land to be released from the Green Belt to help meet the development needs of the District beyond the end of the plan period (post-2038). It is also noted that the adopted Core Strategy identified a single parcel of Green Belt on land East of Wimblebury Road for such a purpose (which comprises part of proposed site allocation SH2). This is despite the recognition in the CCLPR (under Policy SO.7.7) that releasing Green Belt is necessary to meet the growth requirements of the District and help to address the unmet shortfall in neighbouring areas.

4.29 RPS suggests that the need to release Green Belt from around the urban areas of Cannock Chase District is unlikely to abate in future local plan reviews, and therefore the Council should take a more pro-active approach to identifying appropriate Green Belt sites for safeguarding in the CCLPR. Cannock Chase District has a lengthy and positive track record of safeguarding land for release from the Green Belt (Land West of Pye Green Road and land at Norton Canes) and it is essential this is repeated through the Local Plan Review. Failure to do so would not accord with national policy on safeguarding of land in plans (NPPF 2019, paragraph 139c).

Proposed Safeguarded Land Parcel - land adjacent to ‘East of Wimblebury Road’

4.30 In this context, RPS proposes an additional parcel of Green Belt land for safeguarding in the CCLPR, described here as the ‘Proposed Safeguarded Land Parcel’. The land in question lies adjacent to the east of the proposed site allocation East of Wimblebury Road (SH2). The land is wholly under the control of Taylor Wimpey and is shown as the hatched area on Figure 2.2 of this submission. Whilst this parcel of land does not impact in any way on the delivery of proposed allocation SH2, its future use and access could be facilitated through SH2 as indicated on the plan attached above at Figure 2.2.

4.31 RPS acknowledges that this land parcel is located in the existing adopted Green Belt. The land put forward for safeguarding comprises parts of the following two sub-parcels, these being:

- *W113 which consists of the wooded area; and*
- *OA9 which consists of the agricultural fields in the south east of the Site.*

4.32 These sub-parcels were therefore assessed as part of the Council’s evidence base on Green Belt as shown on the image above (Figure 4.2). The Green Belt Part 2 Study assessment of the contribution that the WI13 parcel makes to the five purposes of the Green Belt and the potential degree of harm to the Green Belt that would result from the release of the land from the Green Belt is summarised in Table 4.2 below:

Table 4.2 Green Belt Part 2 Study Assessment for parcel WI13

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Wimblesley and Heath Hayes	Release of WI13 from designation of Green Belt	4.90	Strong	Relatively strong	Strong	Weak/No	Equal Contribution	Very High
Wimblesley and Heath Hayes	Release of WI13 from designation of Green Belt and Heath Hayes	4.90	Strong	Relatively strong	Strong	Weak/No	Equal Contribution	High
Wimblesley and Heath Hayes	Release of WI13 from designation of Green Belt and Heath Hayes	4.90	Relatively strong	Moderate	Relatively strong	Weak/No	Equal Contribution	Moderate-High
Wimblesley and Heath Hayes	Release of WI13 from designation of Heath Hayes	4.90	Strong	Relatively strong	Strong	Weak/No	Equal Contribution	Very High

4.33 For parcel OA9, an assessment of potential harm was not undertaken as part of the Green Belt Part 2 Study. The findings of the assessment of the contribution that the parcel makes to the five purposes of the Green Belt is shown below in Table 4.3 below:

Table 4.3 Green Belt Part 2 Study Assessment (Parcel OA9)

Outer Area	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating
OA9	10.93	Weak/No Contribution	Relatively Strong	Strong	Weak/No Contribution	Equal Contribution
OA9	10.93	Purpose 1: Land is not close enough to the large built-up area to be associated with it.	Purpose 2: Land lies in a moderate gap between Heath Hayes and Burntwood, but there are some significant separating features, including Cuckoo Bank and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.	Purpose 3: Land is countryside.	Purpose 4: The land does not contribute to the setting or special character of any historic towns.	Purpose 5: All Green Belt land is considered to make an equal contribution to this purpose.

4.34 However, the site boundaries for these two parcels do not correspond with the area under Taylor Wimpey’s control and thus would not align with the area proposed for safeguarding in the CCLPR through this submission.

Assessment of Proposed Safeguarded Land Parcel

4.35 In light of the discrepancy between the various site boundaries, the Green Belt Assessment (GBA) undertaken by RPS also specifically looks at the Taylor Wimpey land comprising the Proposed Safeguarded Land Parcel.

4.36 **Figure 4.4** below shows the extent of the Proposed Safeguarded Land Parcel:

Figure 4.4: Proposed Safeguarded Land Parcel



4.37 RPS consider the contributions to the purposes of the Green Belt considered to be made by the Proposed Safeguarded Land Parcel to be:

- a moderate contribution to Purposes 1;
- a relatively weak contribution to Purpose 2;
- a relatively strong contribution to Purpose 3
- no contribution to Purpose 4.

4.38 RPS note that the combination of these contributions and a minor impact on adjacent Green Belt land is not given as an example in the benchmarks the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment. However, it would appear to sit between the examples given for moderate-high and moderate harm.

4.39 Furthermore, as noted above RPS question the approach to assessing impact on adjacent parcels and note that the characteristics of WI13 such as its heavily wooded nature, and connection to the SSSI mean that it is unlikely to be recommended for release from the Green Belt even if the

Proposed Safeguarded Land Parcel is developed. As such we question the contention that increasing the urban containment of WI13 in this particular circumstance would diminish the role of WI13 as an inset edge boundary and suggest therefore that the level of harm of releasing the Proposed Allocated Land Parcel should only at most be assessed as moderate.

4.40 The nature and characteristics of these parcels will therefore ensure that the boundary between these and the Proposed Safeguarded Land Parcel can endure in the future. This would be in accordance with paragraph 136 of the National Planning Policy Framework 2019 (NPPF) which states:

“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”

4.41 Table 4.4 below provides a summary of our assessment of the Proposed Safeguarded Land Parcel:

Table 4.4: Summary of RPS findings for Proposed Safeguarded Land Parcel

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Wimblebury and Heath Hayes	Release of Proposed Safeguarded Land Parcel as an expansion of Wimblebury and Heath Hayes	6.1	Moderate	Relatively Weak	Relatively Strong	No	Equal	Moderate

4.42 Based on the findings of the GBA, RPS proposes the following approach:

- Part of Parcel WI11 within TW control and part of WI13 outside of Proposed Safeguarded Land Parcel– proposed to be retained as Green Belt to provide compensatory improvements required under national policy. These could include environmental enhancements or improvements to accessibility of surrounding areas of Green Belt through potential enhancement to existing public rights of way.
- Proposed Safeguarded Land Parcel (Part of Parcel OA9 within TW control and part of parcel WI13) – to be safeguarded as land available for possible future development to meet housing needs beyond the plan period.

4.43 In relation to the Proposed Safeguarded Land Parcel, RPS acknowledges that this parcel, in isolation, is considered to make a moderate contribution to the Green Belt. However, when considered in the context of the wider masterplan which includes the proposed site allocation and the areas to be retained (WI11 and WI13) there are clear benefits that could be achieved through the release of this area for development, including the funding of wider compensatory improvements across the site, which would represent longer-term benefits to the local community that would not be secured without cooperation of the landowner.

4.44 RPS therefore recommend that the Council consider identifying the land parcel discussed as safeguarded land in the next iteration of the CCLPR.

5 PROPOSED POLICY FOR SITE SH2

Question 14 In the next iteration of the Plan we will develop site specific allocation policies. Are there any local infrastructure requirements the sites in Tables B and C should address?

5.1 It is acknowledged that the Regulation 19 Plan will contain policies for the individual allocations. Set out below is proposed wording for a site-specific allocation policy for Land East of Wimblebury Road (SH2). It draws on the overarching policy approach set out in Policy SO3.1 (Provision of New Homes) to inform the range of criteria that development at the Site should, reasonably, be expected to address.

5.2 The draft text is as follows:

Site-Specific Allocation Policy SH2 – Land East of Wimblebury Road

- A. The design and layout of development will reflect the principles set out in illustrative masterplan for the site.*
- B. The development of the site will deliver a minimum of 410 dwellings across a range of types and tenures.*
- C. The primary access point into the site will be via Wimblebury Road. A secondary access point will also be provided off Wimblebury Road.*
- D. The frontage to Wimblebury Road will be designed to incorporate a new footway, improved pedestrian crossings and a relocated bus stop.*
- E. Existing hedgerows, trees and water courses will, where appropriate or required for access purposes, be retained and incorporated within the proposed development, and suitable ecological mitigation and, where appropriate, compensatory measures will be incorporated, where possible, within the site. Key ecological features should be protected, well buffered, and connected with additional habitat creation and linkages.*
- F. The northeast corner of the site, as shown on the illustrative masterplan as overlooked from Wimblebury Mound, will be retained as an area of public open space, incorporating additional landscaping and planting as necessary to provide a buffer between the new development and the wider countryside.*
- G. A local equipped area of play will be provided to meet the needs of new younger residents.*
- H. Development will incorporate new or enhanced attenuation ponds within the greenspace corridor to provide suitable sustainable drainage systems on the site, subject to the findings of site-specific flood risk assessment. The existing field pond in the northern field will be improved to enhance its storage capacity as well as its ecological and amenity value. Flood capacity shall be retained on site.*

- I. New or enhanced cycle and footpath linkages, including enhanced connections and alignments to existing public rights of way, will be provided within the development ensuring suitable access for walkers and cyclists through the site, as well ensuring suitable connections can be achieved to the established routes towards the other facilities within the local area and to the wider countryside.*
- J. The development will provide supporting transport infrastructure to mitigate the impact of traffic associated with the development, including commensurate financial contributions towards improvements to the Five Ways Island roundabout and strategic and the local highway network as appropriate, to mitigate the impacts of development.*
- K. The development will, as far as practicable, incorporate measures to adapt to climate change, minimise energy use and include renewable energy technologies in accordance with other relevant policies in the Plan.*
- L. Education-related contributions will be secured off-site in lieu of on-site provision and will be commensurate with the demands generated by the development.*
- M. Foul drainage from the development shall be connected to the mains sewerage network. The development shall demonstrate that there is adequate capacity in water recycling centre (sewage treatment works) and the foul sewerage network to serve the proposed development and that it will not have an adverse impact on surface or ground water in terms of quality and quantity.*
- N. Other developer contributions will be secured where these meet the relevant tests under national policy and CIL regulations and which relate to requirements set out in other policies in the development plan.*

5.3 RPS respectfully submits the draft text for consideration by the Council prior to the next stage of the CCLPR process.

6 CONCLUSIONS

- 6.1 These representations have been prepared on behalf of Taylor Wimpey with respect to their interest in Land East of Wimblebury Road. The site has been identified in the Cannock Chase Local Plan Review Preferred Options consultation document (CCLPR) as a housing allocation (SH2- for 410 dwellings).
- 6.2 The identification of the site in the CCLPR is welcomed and supported. However, a number of concerns have been identified that should be considered prior to publishing the next iteration of the CCLPR. These include:
- Define site allocations capacities as ‘minima’ rather than as ‘approximate’ as currently stated.
 - Consider taking a greater proportion of unmet need (housing shortfall) from neighbouring areas, on the basis that the Council assumes other neighbouring authorities are proposing take higher numbers than otherwise suggested in their own local plan reviews to date. This relates to South Staffordshire District, who the Council assume will be taking 4,500 dwellings, but is actually only considering a figure *up to* 4,000.
 - As drafted, the wording of the CCLPR assumes that site SH2 is being expected to accommodate a new primary school. However, given the nearby site allocation (Land South of Lichfield Road) is over twice the size (in area) it is not considered fair and reasonable to expect SH2 to accommodate such a large piece of infrastructure. A fairer approach would be to allow SH2 to provide a financial contribution to assist the viability of providing the school on the larger allocation.
 - Whilst it is considered the proposed release of Land East of Wimblebury Road (ref. WI12) from the Green Belt is justified, concerns are raised that the Council’s updated Green Belt Assessment for WI12 and other adjacent land parcels (summarised in chapter 4 of this submission) potentially over-states the potential harm that would be caused were these parcels, in particular WI12 and OA9, to be released from the Green Belt.
 - In addition, the CCLPR does not identify any additional safeguarded land to help meet the development needs of the District beyond the plan period (2018-2038). This is despite the fact that Green Belt release is likely to be a recurring feature of plan reviews in Cannock Chase given the lack of capacity to accommodate significant growth within existing urban areas (as reflected in the wording of proposed Policy SO7.7 of the CCLPR – see paragraph 4.5 of this submission).
 - This submission therefore proposes additional land (‘Proposed Safeguarded land Parcel’) to be safeguarded for future needs in the CCLPR located contiguous with the Proposed Allocated Land Parcel identified in SH2 (Figure 4.4 illustrates the extent of the land in question).

- 6.3 On receipt of this submission, Taylor Wimpey would welcome continued discussion with the Council regarding the emerging proposals in the CCLPR in order that a suitable scheme can, be brought forward in a timely manner.

EAST OF WIMBLEBURY ROAD- SITE SPECIFIC GREEN BELT ASSESSMENT

Prepared for Taylor Wimpey UK Ltd



JBB8892 - C7660
East of Wimblebury Road-
Site Specific Green Belt
Assessment
1
27 April 2021

REPORT

Quality Management

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EXECUTIVE SUMMARY

RPS Consulting Services Ltd (RPS) have undertaken this Site Specific Green Belt Assessment (the Assessment) to assess the level of harm that would be caused by the release of land east of Wimblebury Road and adjacent land (the Site) under the sole control of Taylor Wimpey UK Ltd in support of representations made to the Cannock Chase Local Plan preferred options consultation.

In preparing the Assessment regard has been given to the Cannock Chase Green Belt Harm Assessment February 2021 (the 2021 LUC Assessment) prepared by Land Use Consultants Ltd on behalf of Cannock Chase District Council (the Council). In particular this Assessment follows the same methodology as the 2021 LUC Assessment to allow for comparison of its findings.

For the purposes of this Assessment the Site has been divided into two parcels, namely the Proposed Allocated Land Parcel and the Proposed Safeguarded Land Parcel. We recommend that the wooded area that separates them (the Woodland) remains in the Green Belt and suggest that it could be suitable for providing compensatory improvements either through environmental enhancements or improvements to accessibility of surrounding areas of Green Belt through potential enhancement to existing public rights of way

For the Proposed Allocated Land Parcel this Assessment finds that the level of harm associated with its release would be moderate.

For the Proposed Safeguarded Land Parcel this Assessment finds that the level of harm associated with its release would be moderate.

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1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd (RPS) are instructed by Taylor Wimpey UK Ltd (Taylor Wimpey) to represent their interests in the context of the preferred options consultation on the Cannock Chase Local Plan (the Plan) with regards to the land to the east of Wimblebury Road and adjacent land (collectively the Site) which is within their sole ownership.
- 1.2 This Site-Specific Green Belt Assessment (the Assessment) has been prepared to assess the potential harm of releasing the Site from the Green Belt through the Plan for development for residential development. The Assessment forms part of the representations prepared by RPS on behalf of Taylor Wimpey to the preferred options consultation on the Plan.
- 1.3 In preparing the Assessment regard has been given to the Cannock Chase Green Belt Harm Assessment February 2021 (the 2021 LUC Assessment) prepared by Land Use Consultants Ltd on behalf of Cannock Chase District Council (the Council). In particular this Assessment follows the same methodology as the 2021 LUC Assessment to allow for comparison of its findings.
- 1.4 The 2021 LUC Assessment assessed the land currently in the Green Belt that is proposed for allocation by the Plan as part of Site SH2 (the Proposed Allocated Land Parcel). The 2021 LUC Assessment identifies this area as WI12. However, the area of land to the south east referred to by the 2021 LUC Assessment as OA9 (the Proposed Safeguarded Land Parcel) was only assessed at a high level as an outer area. This Assessment assesses this area in more detail. An earlier assessment also prepared by LUC in 2016, the Cannock Chase Green Belt Study (the 2016 LUC Assessment), assessed the Proposed Allocated Land Parcel in detail, but only assessed the Proposed Safeguarded Parcel as part of a broad area. Where appropriate we have drawn upon the findings of the 2016 LUC Assessment to inform the Assessment of the Site.
- 1.5 This Assessment is structured in the following manner:
- Overview of the Site;
 - Approach to Green Belt Assessment;
 - Findings of the Site Specific Green Belt Assessment; and
 - Conclusions.

2 OVERVIEW OF THE SITE

Location

- 2.1 The Site is located on the eastern edge of Cannock at Heath Hayes and Wimblebury in the Cannock Chase District of Staffordshire. Wimblebury is a former mining village, consequently the landscape around it and to the east has been shaped by this former activity.
- 2.2 Alongside the northern boundary of the Proposed Allocated Land Parcel is Wimblebury Mound, a striking former spoil heap, now vegetated with mature pines, which is managed as a countryside access area by Staffordshire County Council. The mound lies on the summit of a low hill which falls north and north west towards Wimblebury and south across the site to Heath Hayes and beyond to Chasewater (a large canal feeder reservoir).
- 2.3 The most northern part of the land within the control of Taylor Wimpey is separated from the proposed allocation SH2 by a public right of way that runs along the northern boundary of SH2 into the adjacent Wimblebury Mound. This area is also heavily wooded and so in terms of land cover is more closely associated with Wimblebury Mound than SH2. As such RPS agree with the 2021 LUC Assessment which identifies this most northern part of the land within the control of Taylor Wimpey as forming a combined parcel with Wimblebury Mound for the purposes of Green Belt Assessment. RPS have not undertaken a detailed assessment of this most northern part of the Site as we broadly agree with the findings of the 2021 LUC Assessment
- 2.4 An area of established wet woodland to the east of Wimblebury mound connects to another pine covered mound which frames the eastern edge of the Proposed Allocated Land Parcel with a continuous strip of established wet birch woodland (the Woodland) at its base along the Proposed Allocated Land Parcel boundary. This Woodland extends to the south and forms the northern and eastern boundaries of the Proposed Safeguarded Land Parcel.
- 2.5 Wimblebury Road forms the western Proposed Allocated Land Parcel boundary. Development along the road includes housing of various ages and styles together with the local primary school. The road is traffic calmed with speed bumps, and for the most part has a footway only on the western side, although there is a length of footway immediately opposite to the school. Development to the north of the school is set back by 11-12 m from the road and properties have direct access to the road with on-plot parking.
- 2.6 The southern boundary of the Proposed Allocated Land Parcel abuts Heath Hayes Park, which is an informal park with many natural areas. It contains a children's play area, two football pitches, changing accommodation and a stoned car park accessed off Wimblebury Road, as well as an area of allotments. The Heath Hayes War Memorial Gates mark the park's main entrance at its southern end.

- 2.7 An unsurfaced footpath within a hedged track, runs alongside the southern boundary of the Proposed Allocated Land Parcel at the edge of the playing fields and provides access into the Woodland along the eastern edge of the Proposed Allocated Land Parcel. Beyond the Woodlands to the east lies an extensive area of former opencast mining which is now restored as a mixture of heath and farmland with public access across it.
- 2.8 To the south of the Proposed Safeguarded Land Parcel is Cannock Road, with part of Coal Haulage Road running through the most southern part of the Site (shown yellow on **Figure 2.1** below). Land lying between Coal Haulage Road and Cannock Road to the south east of the Proposed Safeguarded Land Parcel is designated as a Site of Special Scientific Interest as is much of the land to the east of the Proposed Safeguarded Land Parcel, while Cannock Chase Special Area of Conservation lies just over two miles to the north west of the Site. A hedgerow runs along the eastern boundary of the Proposed Safeguarded Land Parcel the southern portion of which abuts Coal Haulage Road beyond which lies the SSSI. The more northerly section separates the Proposed Safeguarded Land Parcel from a roughly triangular field beyond which lies the SSSI.
- 2.9 **Figure 2.1** shows the Site boundary edged in red. **Figure 2.2** shows the Site context with the Proposed Allocated Land Parcel which has been promoted to the early stages of the Cannock Local Plan edged in red.

Figure 2.1: Site Location

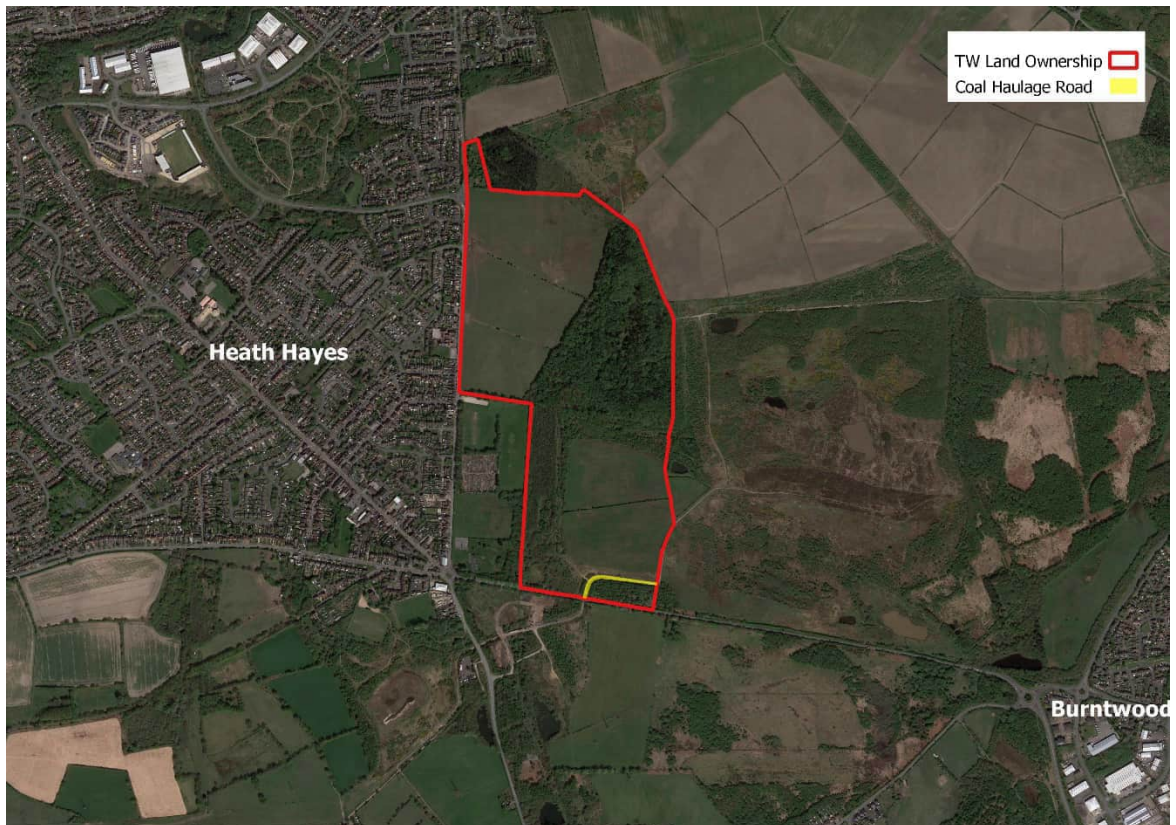
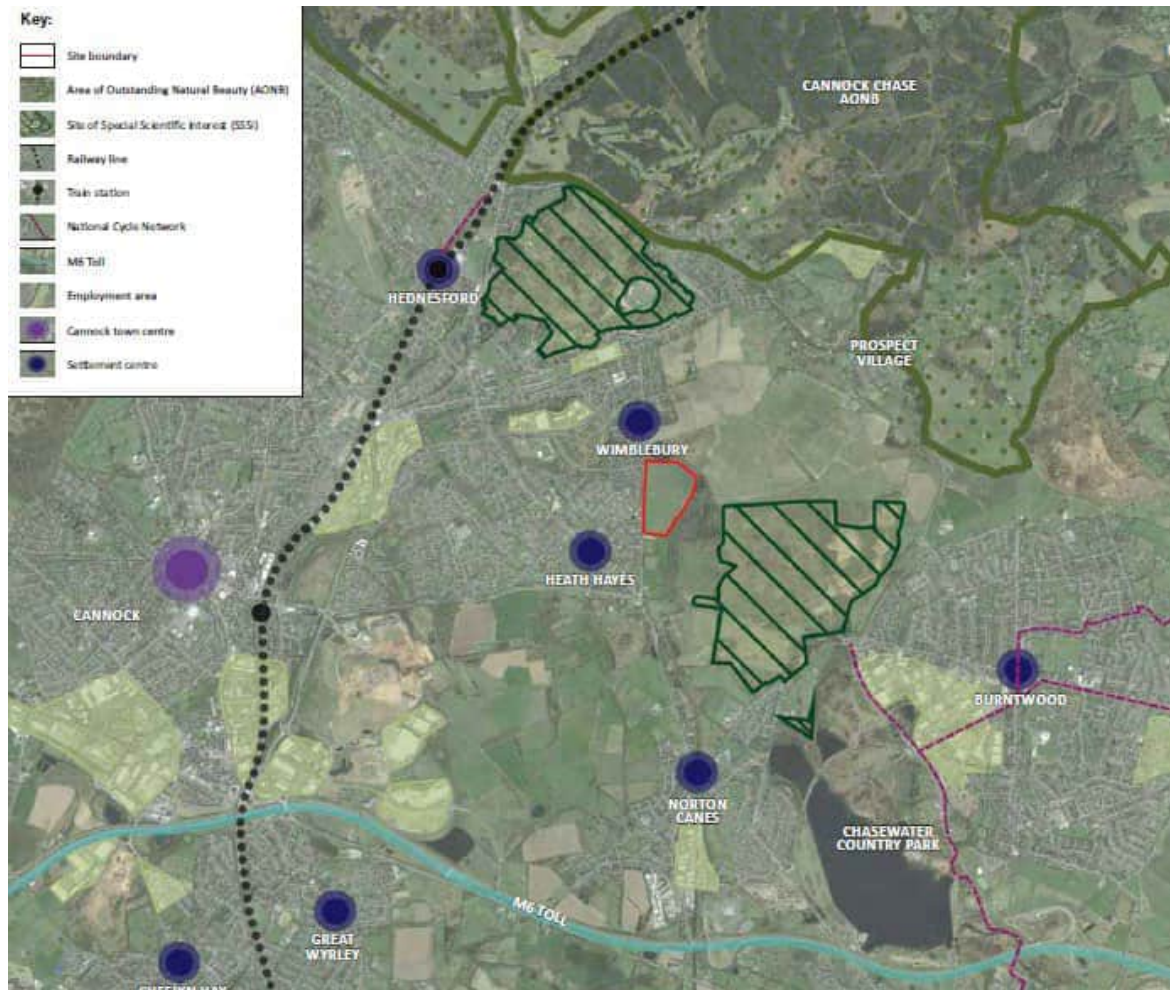


Figure 2.2: Site Context



Site Description

- 2.10 The whole Site consisting of the Proposed Allocated Land Parcel, the Proposed Safeguarded Land Parcel, the Woodland, the northern spur adjacent to Wimblebury Mound, and a small section of the SSSI in the southern eastern corner is owned by Taylor Wimpey
- 2.11 The Site consists of agricultural land, mixed broadleaf and coniferous woodland, and associated access roads and ancillary buildings. The landholding abuts public highways, adjacent residential, agricultural, and commercial properties. There are several public rights of way across the landholding including one that crosses the most northern part of the Site and then runs along the northern boundary of the Site, and one that runs from Wimblebury Road, where the site abuts the existing public park to the south, and then runs through the wooded area within the eastern part of the Site. A shallow pond is located in the western part of the site.
- 2.12 The Proposed Allocated Land Parcel covers 17.9ha and comprises three fields. The northern field, visible from Wimblebury Mound, contains a shallow waterbody. It is separated from the two southern

fields by a ditch with flowing water, which discharges into a watercourse at the edge of the woodland to the east of the Proposed Allocated Land Parcel. There are known to be some mineshafts within the north eastern corner of this field.

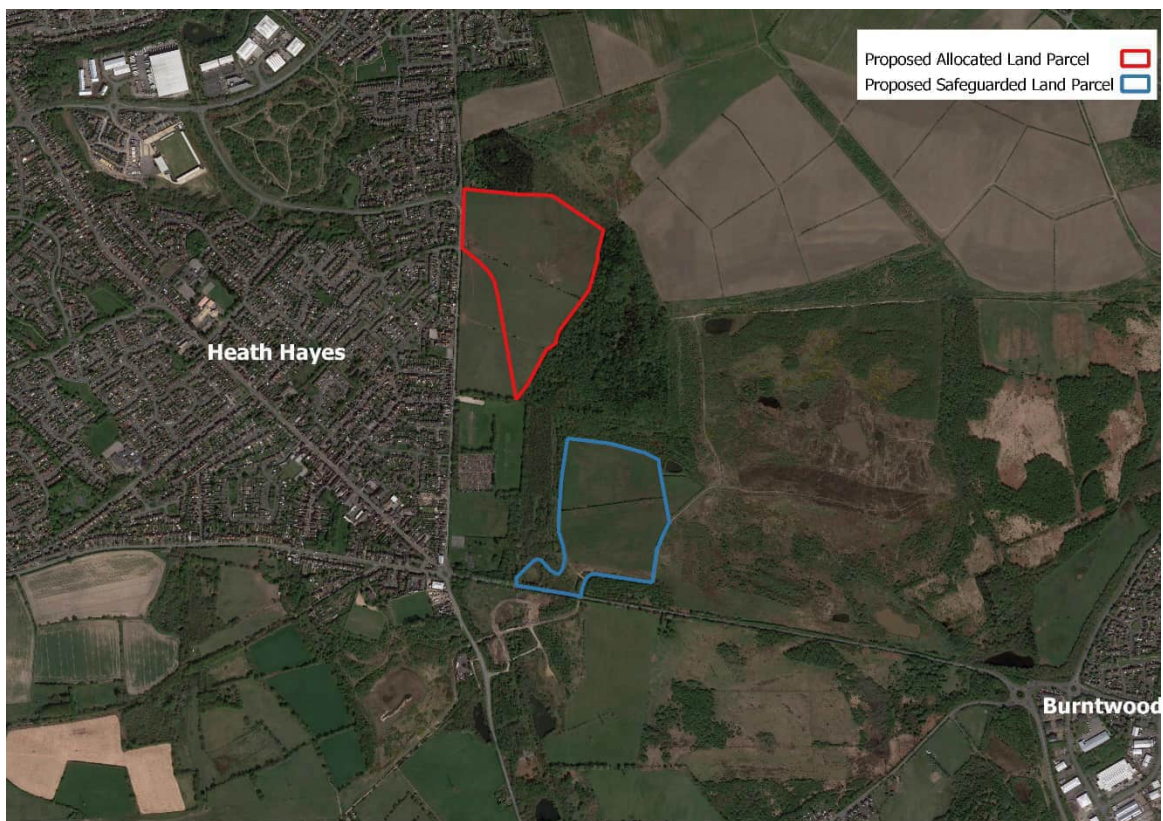
2.13 The southern fields slope to the south and south west and are separated by post and wire agricultural fencing with sporadic thorn bushes. A hedge along the roadside along the western boundary is becoming overgrown and filters views into the site from the road.

2.14 There are no significant viewpoints overlooking the Proposed Allocated Land Parcel apart from those obtained from Wimblebury Mound, and the Proposed Allocated Land Parcel is both physically and visually extremely well enclosed by landform and vegetation, road and parkland.

2.15 The Proposed Safeguarded Land Parcel comprises of two fields covering 11.2 ha with a hedgerow dividing the fields. This hedgerow runs from the Woodland in the east to the triangular field beyond the boundary of the Proposed Safeguarded Land Parcel to the west. Ditches run alongside the hedgerow and also run alongside the hedgerow that separates the Proposed Safeguarded Land Parcel from the triangular parcel beyond the eastern boundary of the Site. The south western part of the Proposed Safeguarded Land Parcel is lightly wooded with a strong linear tree belt running along the southern boundary adjacent to Cannock Road. A dry pond is also located in this area.

2.16 **Figure 2.3** below shows the relationship between the two parcels.

Figure 2.3: Site Parcels

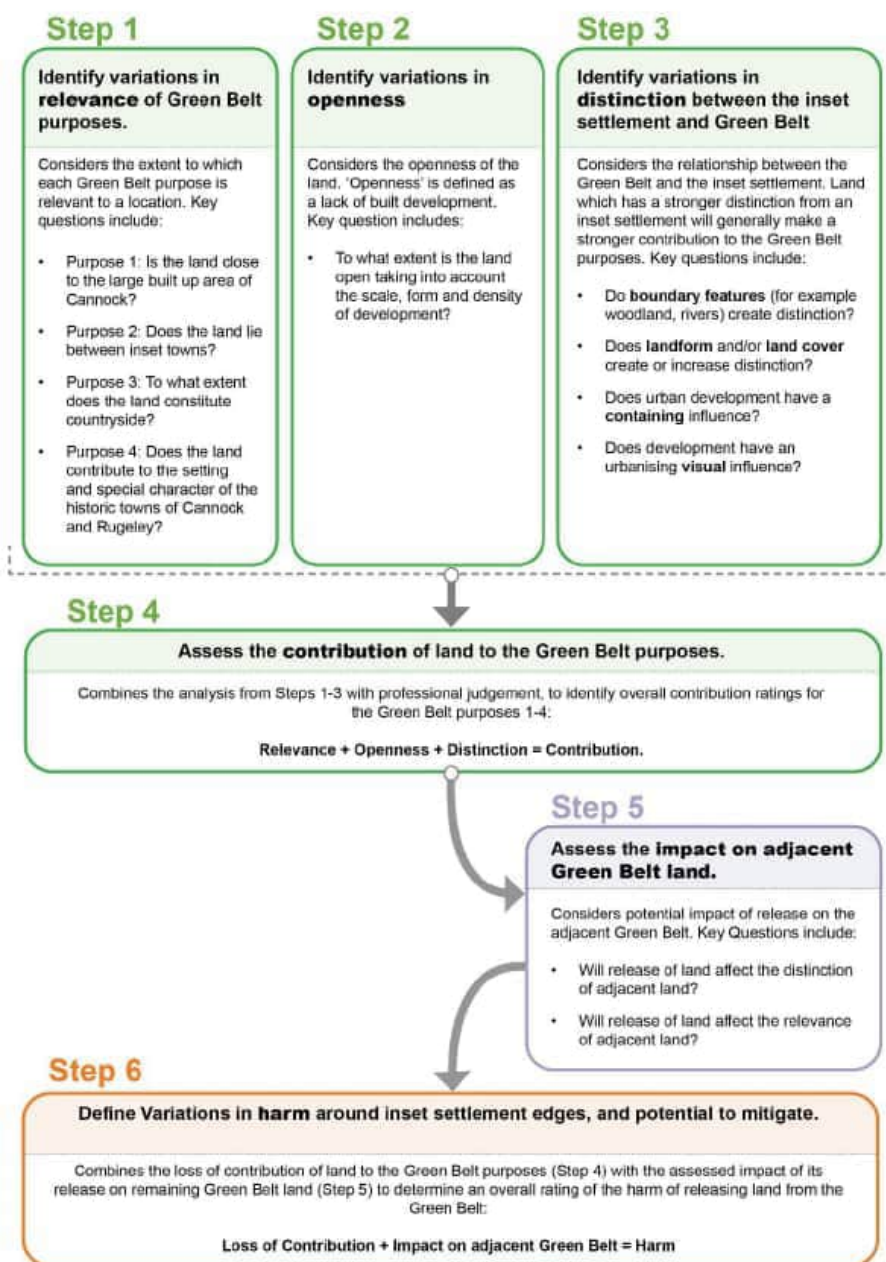


3 APPROACH TO GREEN BELT ASSESSMENT

Methodology

3.1 The methodology of this Assessment follows the same methodology as the 2021 LUC Assessment which was prepared for the Council to allow for comparison of the results. **Figure 3.1** below which has been taken from the 2021 LUC Assessment summarises the overall approach to assessment.

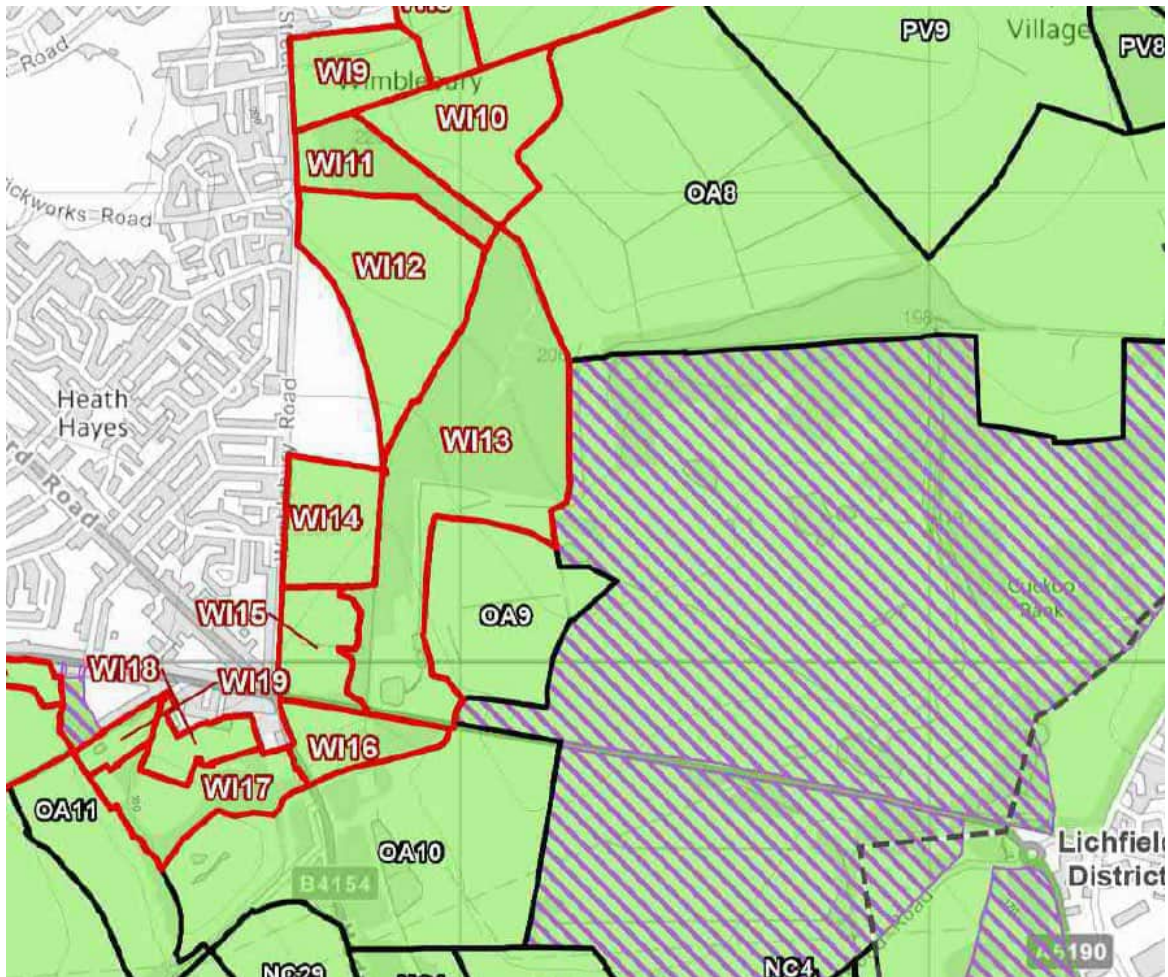
Figure 3.1: Green Belt Assessment Methodology



Distinction

- 3.2 RPS do not agree with LUC's position with regards to defining the Proposed Safeguarded Land Parcel as part of an outer area. Paragraph 3.10 of the 2021 LUC Assessment states that the process for identifying parcels for assessment was undertaken by working out from each inset settlement edge until a strong distinction was identified. Beyond these parcels, outer areas were defined, which were subject to a high level contribution assessment.
- 3.3 Paragraph 3.69 of the 2021 LUC Assessment states that four interrelated elements were considered to assess distinction between land within the Green Belt and developed land. These are:
- Boundary features.
 - Landform and land cover;
 - Urbanising visual influence; and
 - Urban containment;
- 3.4 Consideration of these elements was combined, using professional judgement, to give a rating on a 4-point scale (weak, moderate, strong and very strong distinction).
- 3.5 Parcel WI13 abuts the Proposed Allocated Land Parcel. It consists of the Woodland and the most south eastern part of the Proposed Safeguarded Land Parcel. Parcel OA9 consists of the majority of the Proposed Safeguarded Land Parcel, with the exception of the area included in WI13. The small triangular field on the eastern edge of parcel OA9 is not included within the Proposed Safeguarded Land Parcel. Parcel WI16 is located to the south of the Proposed Safeguarded Land Parcel. **Figure 3.2** below shows the parcels used by the 2021 LUC Assessment:

Figure 3.2: LUC 2021 Assessment Parcels



3.6 The majority of the Proposed Safeguarded Land Parcel was not assessed in detail because the 2021 LUC Assessment determined that parcels WI13 and WI16 have very strong and strong distinction from the urban area.

3.7 With regards to distinction of parcel WI13 Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes states:

“Tree cover is very prominent within the parcel, making it significantly different from the settlement, and forming a strong boundary feature, which creates separation from Wimblebury and Heath Hayes. The parcel extends a significant distance from the settlement, is not contained by urban development, and views are dominated by open countryside. Therefore, there is very strong distinction between the parcel and the urban area.”

3.8 For parcel WI16 Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes states the following with regards to distinction:

“The tree line and Norton Road to the west of the parcel are a moderate boundary feature creating separation from Wimblebury and Heath Hayes. The field is lower than the urban area, which

combined with the well-hedged boundaries means that the countryside dominates views. The parcel is not contained by urban development. Therefore, there is strong distinction between the parcel and the urban area.”

- 3.9 RPS disagree that parcel WI16 is strongly distinct from the urban area. The parcel is partly contained by urban development on its western side where it abuts the inset edge. RPS also note that a crematorium and associated car parking granted approval under application reference CH/18/380 on the 21st of January 2019 has been constructed on the eastern part of the parcel which provides a degree of urbanising influence. As shown on **Figure 3.3** below, taken from Cannock Road in November 2020 during the construction of the Crematorium, there are views into and out of the parcel during winter:

Figure 3.3: View of Crematorium being constructed taken from Cannock Road, November 2020



- 3.10 Given the points above RPS consider that parcel WI16 to only be of moderate distinction between the parcel and urban area. Accordingly, parcels beyond this including the Site should not be considered as outer areas and should be subject to more detailed site specific assessment than was undertaken as part of the 2021 LUC Green Belt Assessment.

Inspector’s Letter to Welwyn Hatfield Borough Council December 2017

- 3.11 RPS note that the 2021 LUC Assessment refers to the Inspector’s Letter to Welwyn Hatfield Borough Council (December 2017). In this letter the Inspector highlights a number of failings with the

approach taken to Green Belt review on the preparation of the Welwyn Hatfield Local Plan. The following quotes are particularly relevant to the approach undertaken by the 2021 LUC Assessment:

*“The phase 1 Green Belt Review **was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas.** It goes without saying that a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt. Such an approach is also more likely to reveal opportunities as well as localised constraints, both of which might reasonably be considered further.” (fourth paragraph, **emphasis added**)*

3.12 RPS contend that this criticism can be applied to the assessment of the outer area parcels identified in the LUC 2021 Assessment.

3.13 The Inspector’s Letter to Welwyn Hatfield Borough Council (December 2017) goes on to state:

*“Additionally, the phase 2 Green Belt Review, which did look at a finer grain of sites, does not appear to have examined all of the potential development sites **adjacent to the urban areas.**” (paragraph 5, **emphasis added**)*

3.14 LUC appear to have interpreted this as meaning immediately adjacent when considering distinction. This would mean that only development parcels which have no separation from urban areas would be assessed. This would exclude parcels separated from urban areas by any features such as woodland, rivers, roads etc. which would be contrary to established practice.

3.15 It is noted that paragraph 3.93 of the 2021 LUC Assessment defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land / parcels being assessed for potential release. This is contradictory to the approach taken to distinction wherein the 2021 LUC Assessment has used the presence of a parcel that they have assessed as being strongly distinct to mean that all parcels beyond this should not be assessed at more than a high level as an outer area. Parcels such as the Proposed Safeguarded Land Parcel can still be in close proximity to the urban areas while not being immediately next to said urban areas.

3.16 As such RPS consider that the approach taken by LUC in the 2021 LUC Assessment does not reflect the approach advocated by the Inspector’s Letter to Welwyn Hatfield Borough Council (December 2017). RPS contend that to be in accordance with this approach the approach to assessment should consider all potential development sites adjacent to urban areas, such as the Proposed Safeguarded Land Parcel.

4 IDENTIFICATION OF PARCELS FOR SITE SPECIFIC GREEN BELT ASSESSMENT

- 4.1 RPS agree with the approach taken in the 2021 LUC Assessment with regards to the identification of the Proposed Allocated Land Parcel. RPS also agree with the 2021 LUC Assessment which identifies the most northern part of the land within the control of Taylor Wimpey UK Ltd as forming a combined parcel with Wimblebury Mound for the purposes of Green Belt Assessment. RPS have not undertaken a detailed assessment of this most northern part of the Site as we broadly agree with the findings of the 2021 LUC Assessment.
- 4.2 However, RPS propose a slightly different boundary for the Proposed Safeguarded Land Parcel on the basis that there is a difference in the character of the Woodland, which is densely covered by trees from the more lightly wooded area in the south east of the Proposed Safeguarded Land Parcel. We have also excluded the roughly triangular field to the north east of the Proposed Safeguarded Land Parcel as it lies outside of the control of Taylor Wimpey. As such we have identified the two parcels for this Assessment as shown on **Figures 4.1** and **4.2** below:

Figure 4.1: Proposed Allocated Land Parcel



Figure 4.2: Proposed Safeguarded Land Parcel



4.3 Neither of these parcels are covered by an ‘absolute’ constraint to development, which are defined by paragraph 3.14 of the 2021 LUC Assessment as follows:

- Special Areas of Conservation;
- Sites of Special Scientific Interest;
- Ancient Woodland;
- Scheduled Ancient Monuments;
- Registered Parks and Gardens;
- Common Land;
- Cemeteries; and
- Flood Zone 3.

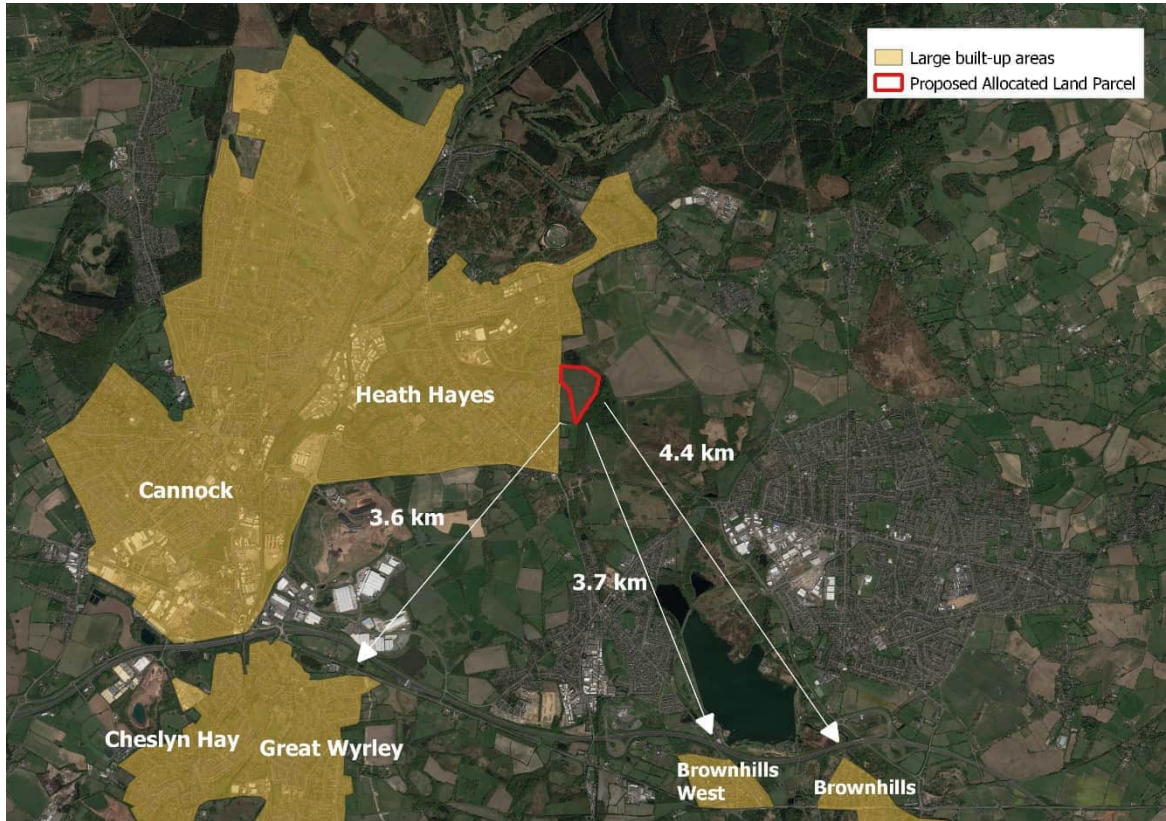
5 GREEN BELT ASSESSMENT OF PROPOSED ALLOCATION LAND PARCEL (POLICY SH2)

Step 1: Consider the ‘relevance’ of each Green Belt purpose

Does the land have the potential to play a role with regard to Purpose 1: to check the unrestricted sprawl of large built-up areas?

- 5.1 On page 28 the 2021 LUC Green Belt Assessment defines the large built-up area as the main urban conurbation of Birmingham and associated towns and urban area of Cannock, Cheslyn Hay, Great Wyrley and Hednesford. Paragraph 3.33 notes that settlements deemed close enough to the ‘core’ urban area for development associated with them to be considered to be part of the large built-up area includes the town of Brownhills West.
- 5.2 It is noted that the previous 2016 LUC Assessment included a much broader definition of the large built-up area including ribbon development associated with all inset areas and industrial estates, business parks and gypsy and traveller sites. As stated at paragraph 3.34 of the 2021 LUC Assessment the definition of the large built-up area was tightened to focus on the major urban areas and to be consistent with the neighbouring Green Belt Studies covering the Black Country, South Staffordshire and Lichfield.
- 5.3 As set out on page 52 of Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes the areas of Wimblebury and Heath Hayes form part of the large built-up area of Cannock. The parcel is adjacent to the large built-up area as shown on **Figure 4.3** below:

Figure 4.1: Purpose 1 Proposed Allocated Land Parcel



Does the land have the potential to play a role with regard to Purpose 2: to prevent neighbouring towns merging into one another?

5.4 Paragraphs 3.38 and 3.39 of the 2021 LUC Assessment defines Purpose 2 towns as:

- The main urban area, grouped around Cannock, Hednesford and Heath Hayes;
- Rugeley;
- Burntwood;
- Brownhills; and
- Bloxwich.

5.5 Paragraph 3.40 of the 2021 LUC Assessment states that:

“Regardless of whether a particular settlement is large enough to realistically be considered a town, it is acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’. This was taken into account in the study.”

- 5.6 As such while neither Brownhills West or Norton Canes are identified as a Purpose 2 town, RPS has considered as part of this assessment the relationship of the Site with these towns.
- 5.7 Pages 33 and 34 of the 2021 LUC Assessment state that Green Belt land has less potential to play a role with regards to Purpose 2 - i.e. gap is robust – if there is a wide gap between towns with some significant separating features. RPS consider this to be the case for the Proposed Allocated Land Parcel, although note that on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that LUC consider this gap to be moderate with some significant separating features including Cuckoo Bank and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.
- 5.8 RPS note that no objective criteria is provided for assessing the relative strength of the gap between Purpose 2 Towns in the 2021 LUC Assessment, such as a measurement of distance. These points are illustrated by **Figure 4.4** below:

Figure 4.2: Purpose 2 Proposed Allocated Land Parcel



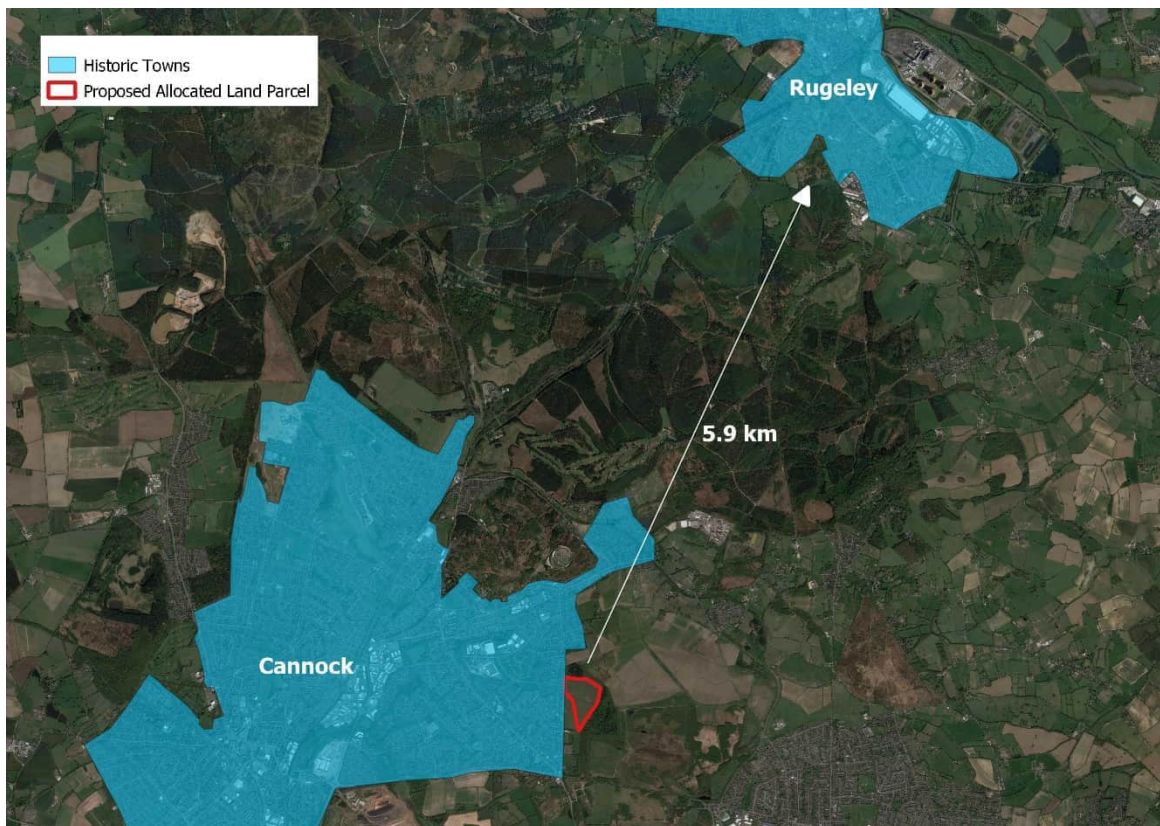
Does the land have the potential to play a role with regard to Purpose 3: to assist in safeguarding the countryside from encroachment?

- 5.9 As set out at paragraph 3.46 of the 2021 LUC Assessment this considers the extent to which land can be considered to constitute 'countryside' on the basis of its usage. It does not consider the impact of development which can be considered to reduce openness (in Green Belt terms), or of development which has a containing urbanising influence, as these are addressed in the analysis at Step 2 and Step 3 respectively.
- 5.10 Paragraph 3.47 of the 2021 LUC Assessment goes on to state that Land may through its usage have a stronger relationship with the adjacent built up area and, as a result, not be considered 'countryside' to the same degree as other open land, but it is important not to stray from assessing the Green Belt purposes into assessing landscape character, sensitivity or value. Whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not taken into consideration: the poor condition of Green Belt land does not necessarily undermine its fundamental role of preventing urban sprawl by keeping land permanently open.
- 5.11 RPS agree with the statement on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the Proposed Allocated Land Parcel is open countryside. As such the land has the potential to play a stronger role with regards to Purpose 3.

Does the land have the potential to play a role with regard to Purpose 4: to preserve the setting and special character of historic towns?

- 5.12 Paragraph 3.52 of the 2021 LUC Assessment states that it concluded that land around two settlements within Cannock Chase District – Cannock and Rugeley – should be considered for potential contribution to Purpose 4. However as noted on page 40 of the 2021 LUC Assessment that the special character of the historic core is not dependent on the landscape setting to which Green Belt land makes a contribution. As such RPS agree with the views of LUC stated on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the Proposed Allocated Land Parcel does not make a contribution towards Purpose 4, despite being located near to Cannock as shown on **Figure 4.5** below:

Figure 4.3: Purpose 4 Proposed Allocated Land Parcel



Does the land have the potential to play a role with regard to Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?

5.13 Paragraph 3.57 of the 2021 LUC Green Belt Assessment notes that due to the nature of the settlement pattern within Cannock, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. As such the 2021 LUC Assessment assumes an even level of contribution to Purpose 5 for all areas of Green Belt based on the average availability of brownfield land across the District. On this basis all parcels of Green Belt land within the District, including the Proposed Allocated Land Parcel, is considered to make a Strong contribution to Purpose 5.

Step 2: Identify variations in Green Belt openness

5.14 At paragraph 3.60 the 2021 LUC Assessment notes that the NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. Accordingly, it notes

that the presence of 'urbanising development' within the Green Belt can diminish the contribution of land to the Green Belt purposes.

- 5.15 Paragraph 3.61 of the 2021 LUC Assessment states that Green Belt openness relates to a lack of 'inappropriate built development' rather than visual openness; thus both undeveloped land which screened from view by landscape elements (e.g. tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms.
- 5.16 RPS agree with the statement on page 50 of the 2021 LUC Assessment that land without built form is open in Green Belt terms. RPS also agree with page 52 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the Proposed Allocated Land Parcel is open, as it is comprised of agricultural fields.

Step 3: Identify variations in the distinction between urban areas and the Green Belt

- 5.17 Paragraph 3.65 of the 2021 LUC Assessment states that having considered in general terms the variations in the relevance of each of the Green Belt purposes, the next step in the assessment process identifies more localised variations in the relationship between Green Belt land and urban development – i.e. whether the land seems like it is part of the urban area or the countryside.
- 5.18 Paragraph 3.66 of the 2021 LUC Assessment goes on to state that land that is more strongly related to urbanising development typically makes a weaker contribution to all of the first three Green Belt purposes, being less likely to be perceived: as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2), or encroaching on the countryside (Purpose 3). While paragraph 3.67 notes of the 2021 LUC Assessment notes that for Purpose 4 there is no separate consideration of distinction, because contrary to Purposes 1 to 3, land which has a strong relationship with the town is likely to make a greater rather than lesser contribution.
- 5.19 Paragraph 3.68 of the 2021 LUC Assessment sets out that the process of assessing distinction was carried out on a settlement by settlement basis, for each inset urban area. The analysis was applied as a progression out from each settlement edge, recognising that with distance from that settlement the level of distinction will only increase, not diminish. RPS agree in general with this approach.
- 5.20 Paragraph 3.69 of the 2021 LUC Assessment states that four interrelated elements were considered to assess distinction between land within the Green Belt and developed land. These are:
- Boundary features.
 - Landform and land cover;
 - Urbanising visual influence; and
 - Urban containment;

- 5.21 Consideration of these elements was combined, using professional judgement, to give a rating on a 4-point scale (weak, moderate, strong and very strong distinction).

Boundary features

- 5.22 Paragraph 3.72 of the 2021 LUC Assessment states that for land adjacent to an urban area the analysis only considered the urban boundary, but progressing further from the urban area, the cumulative impact of multiple boundary features increases distinction.
- 5.23 RPS agree with the statement on page 52 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that there is no defined boundary to separate the Proposed Allocation Land Parcel from the inset, but as yet undeveloped land to the east of Wimblebury Road. However, we do note that there is a hedgerow that runs along Wimblebury Road, including the part of the Proposed Allocated Land Parcel on its north eastern side where it abuts Wimblebury Road, which as per page 53 of the 2021 LUC Assessment is a weak boundary to the urban area.

Landform and land cover

- 5.24 Paragraph 3.74 of the 2021 LUC Assessment notes that as well as landform and land cover serving as boundary features that this may extend into a broader feature which creates greater distinction. Examples are given of a woodland, lake or valley. These types of features do not apply to the Proposed Allocated Land Parcel.

Visual openness

- 5.25 Paragraph 3.75 of the 2021 LUC Assessment notes that this is not concerned with the scenic quality of views, but the extent to which an absence of visual association with the open Green Belt countryside or, conversely, the extent to which the visual dominance of urban development may increase association with the urban area.
- 5.26 RPS agree with the statement on page 52 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that views from the Proposed Allocated Land Parcel are dominated by the urban area.

Urban containment

- 5.27 This relates to whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area.

- 5.28 RPS agree with the statement on page 52 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the Proposed Allocated Land Area is not contained by urban development.

Distinction of the Site

- 5.29 The Proposed Allocated Land Parcel has weak boundary features with the urban area. The Proposed Allocated Land Parcel does not contain landforms or land cover that contribute to distinction. The Proposed Allocated Land Parcel has strong visual association with the urban area. Given this RPS agree that with the statement on page 52 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the Proposed Allocated Land Parcel has moderate distinction with the urban area.

Step 4: Assess the contribution of land to the Green Belt Purposes and define parcels

- 5.30 As set out at paragraph 3.81 of the 2021 LUC Assessment this step considers the analysis in each of the previous steps to identify overall contribution rating for each Green Belt purpose. Each area of variation in contribution to one or more of the purposes was defined as a parcel, with contribution ratings and supporting analysis.
- 5.31 For Green Belt Purposes 1, 2 and 3 the relevance (Step 1), openness (Step 2) and distinction (Step 3) are considered to arrive at a judgement on the relative contribution of different areas of land as described at paragraph 3.82 of the LUC 2021 Assessment. The same paragraph goes on to explain that contribution to the Green Belt purposes was rated on a 5-point scale (strong, relatively strong, moderate, relatively weak and weak/no contribution, in accordance with criteria lists on pages 59 to 67 of the 2021 LUC Assessment. It also notes that these criteria lists indicate typical combinations of relevance, openness and distinction, but professional judgement may result in the addition of particular weight to one of these elements.
- 5.32 For Purpose 4 paragraph 3.83 of the 2021 LUC Assessment explains that in accordance with advice from Historic England, judgements were based on specific analysis of the historic town in question, and its relationship with its Green Belt surroundings as set out in the criteria list for Purpose 4.
- 5.33 Paragraph 3.84 of the 2021 LUC Assessment notes that standard text is used to indicate that contribution to Purpose 5 is consistent across all of the study area.
- 5.34 For Purpose 1 paragraph 3.85 of the 2021 LUC Assessment notes that adjacent to settlements the assumption was made that the purpose will remain relevant at least until the level of distinction between the large built-up area and open land reaches a strong level. Beyond this the relevance, and therefore the contribution, will diminish.

- 5.35 Paragraph 3.86 of the 2021 LUC Assessment notes that in between settlements where Purpose 2 is relevant, contribution will likewise reduce at the periphery of the gap. Unlike Purposes 1 and 2, contribution to Purpose 3 will not diminish with distance from urban areas and will consequently be high for all land beyond those areas that do not have strong distinction from an urban area.

Contribution of the Proposed Allocated Land Parcel to the Green Belt Purposes

- 5.36 RPS consider that the Proposed Allocated Land Parcel consists of an area with a variation in contribution to one or more of the purposes and so should be defined as a parcel. Set out below is our assessment of the contribution of this parcel to each purpose in accordance with the criteria set out on page 59 to 67 of the LUC 2021 Assessment.

Purpose 1

- 5.37 RPS agree with the statement on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the Proposed Allocated Land Area that the Proposed Allocation Land Parcel is open and adjacent to the large built-up area of Cannock. We also agree that the parcel has some relationship with the inset area, but also a degree of distinction from it and that overall it makes a relatively strong contribution to Purpose 1.

Purpose 2

- 5.38 RPS consider the Proposed Allocated Land Parcel to lie within a robust gap between towns and so disagree with the statement on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes which states that it lies within a moderate gap. RPS do agree with the other comments made on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes in relation to this Purpose, namely that there are some significant separating features, including Cuckoo Bank and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI. The parcel has some relationship with the inset area, but also a degree of distinction from it.
- 5.39 On this basis RPS consider that the area makes a relatively weak contribution to Purpose 2, not a moderate contribution as was concluded by LUC.

Purpose 3

- 5.40 RPS agree that the Proposed Allocated Land Parcel is open countryside and that the parcel has some relationship with the inset area, but also moderate distinction from it. Overall, the area makes a relatively strong contribution to safeguarding the countryside from encroachment as stated on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes.

Purpose 4

- 5.41 The Proposed Allocated Land Parcel does not contribute to the historic setting or special character of either Cannock or Rugeley and so makes no contribution to Purpose 4 as stated on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes.

Purpose 5

- 5.42 Page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes states that all Green Belt land is considered to make an equal contribution to this purpose. While RPS do not completely agree with this point as we consider that previously developed land is capable of some development under paragraph 145 g) of the NPPF 2019 and so must make a weaker contribution to Purpose 5 than undeveloped open Green Belt Land, RPS consider that all undeveloped land, such as the Proposed Allocated Land Parcel makes an equal contribution to this purpose.

Loss of contribution

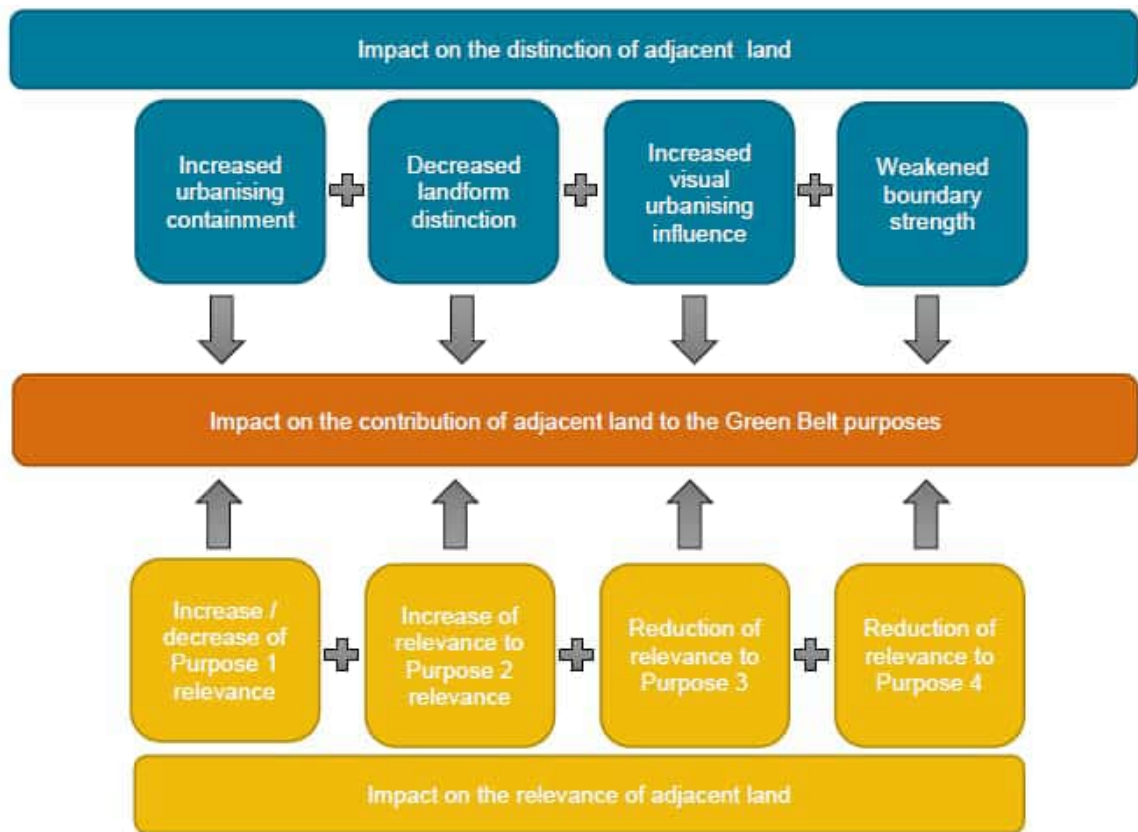
- 5.43 As set out at paragraph 3.90 of the 2021 LUC Assessment the loss of contribution to the Green Belt purposes as a result of the release of a parcel of land equates to the contribution ratings assessed for that parcel.
- 5.44 Paragraph 3.91 of the 2021 LUC Assessment notes that in cases where release of a parcel would also, in order to form an expansion of the inset settlement, necessitate the release of intervening land, the loss of contribution is that associated with the highest contributing parcel. This does not apply to the Proposed Allocated Land Parcel.

Step 5: Assess additional impact of release on adjacent Green Belt

- 5.45 As noted earlier, paragraph 3.93 of the 2021 LUC Assessment defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land / parcels being assessed for potential release.
- 5.46 Paragraph 3.94 goes on to state that the assessment of the additional impact of the release of land on adjacent Green Belt land considered two factors: the impact on the distinction (from inset areas) of the adjacent land and the impact on the relevance of the adjacent land to the NPPF purposes. The third factor, openness, is not relevant to the assessment of impact on adjacent land as it is assumed that adjacent land will remain open. **Figure 4.7** below which is Figure 3.3 in the 2021 LUC Assessment illustrates the elements to be considered when assessing the impact of the release on adjacent Green Belt land.

5.47 It should be noted that this approach is unusual and not consistent with RPS’s substantial experience of undertaking and reviewing Green Belt Assessments elsewhere, however to ensure constituency and aid in allowing the findings of this assessment to be compared with the 2021 LUC Assessment we have followed the same methodology.

Figure 4.4: Variations in impact on release of adjacent land



Impact on distinction

5.48 RPS agree with the statement on page 54 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the release and development of the Proposed Allocated Land Parcel would increase urbanising containment of land in W111.

Impact on relevance

5.49 The release of the Proposed Allocated Land Parcel would not lead to adjacent land becoming close enough to the inset edges of the large built-up area or lead to adjacent retained Green Belt land becoming perceived as being within the large built-up area. Hence, its release would not affect any adjacent land with regards to its relevance for Purpose 1 as explained at paragraph 3.99 of the 2021 LUC Assessment. It would also not lead to any substantial change in the settlement gap and so

would not change the relevance of Purpose 2 for adjacent parcels of land as set out at paragraph 3.100 of the 2021 LUC Assessment.

5.50 Paragraph 3.101 notes that the relevance of adjacent retained Green Belt land to purpose 3 would rarely be affected. Its release would not result in adjacent land becoming contained to the extent that it is too isolated from the wider Green Belt to be considered part of the countryside.

5.51 Adjacent Green Belt land does not make a contribution to Purpose 4 and so the release of the Proposed Allocation Land Parcel would not harm the relevance of adjacent parcels of Green Belt in keeping with the approach set out in paragraph 3.102 of the 2021 LUC Assessment.

Impact on adjacent land

5.52 RPS agree that on the basis of the methodology set out on pages 73 to 76 of the 2021 LUC Assessment that the release of the Proposed Allocated Land Parcel would have a minor impact on adjacent Green Belt land as stated on page 54 of Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes. However as noted above RPS consider this approach to be unusual and not consistent with our substantial experience of undertaking and reviewing Green Belt Assessments elsewhere.

Step 6: Define variations in harm to the Green Belt around the inset edge

Assessment of harm

5.53 RPS do not agree with the conclusion on page 54 of Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that the overall harm of the release of the Proposed Allocated Land Parcel would be Moderate-High. RPS consider the contributions to the purposes of the Green Belt considered to be made by the parcel to be:

- a relatively strong contributions to Purposes 1 and 3;
- a relatively weak contribution to Purpose 2; and,
- no contribution to Purpose 4.

5.54 RPS note that the combination of these contributions and a minor impact on adjacent Green Belt land is not given as an example in the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment. However, it would appear to sit between the examples given for moderate-high and moderate harm.

5.55 Furthermore, as noted above RPS question the approach to assessing impact on adjacent parcels and note that the characteristics of WI11 such as its heavily wooded nature, rising land form, and

connection to the SSSI via the heavily wooded WI13 parcel mean that it is unlikely to be recommended for release from the Green Belt even if the Proposed Allocated Land Parcel is developed and if parcel WI9 and W10 were to be developed. As such we question the contention that increasing the urban containment of WI11 in this particular circumstance would diminish the role of WI11 as an inset edge boundary and suggest therefore that the level of harm of releasing the Proposed Allocated Land Parcel should only at most be assessed as moderate.

5.56 The nature and characteristics of these parcels will therefore ensure that the boundary between these and the Proposed Allocated Land Parcel can endure in the future. This would be in accordance with paragraph 136 of the National Planning Policy Framework 2019 (NPPF) which states:

“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”

5.57 **Table 4.1** below provides a summary of our assessment.

Table 4.1: Summary of Findings for Proposed Allocated Land Parcel

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Wimblebury and Heath Hayes	Release of Proposed Allocated Land Parcel as an expansion of Wimblebury and Heath Hayes	6.1	Relatively Strong	Relatively Weak	Relatively Strong	No	Equal	Moderate

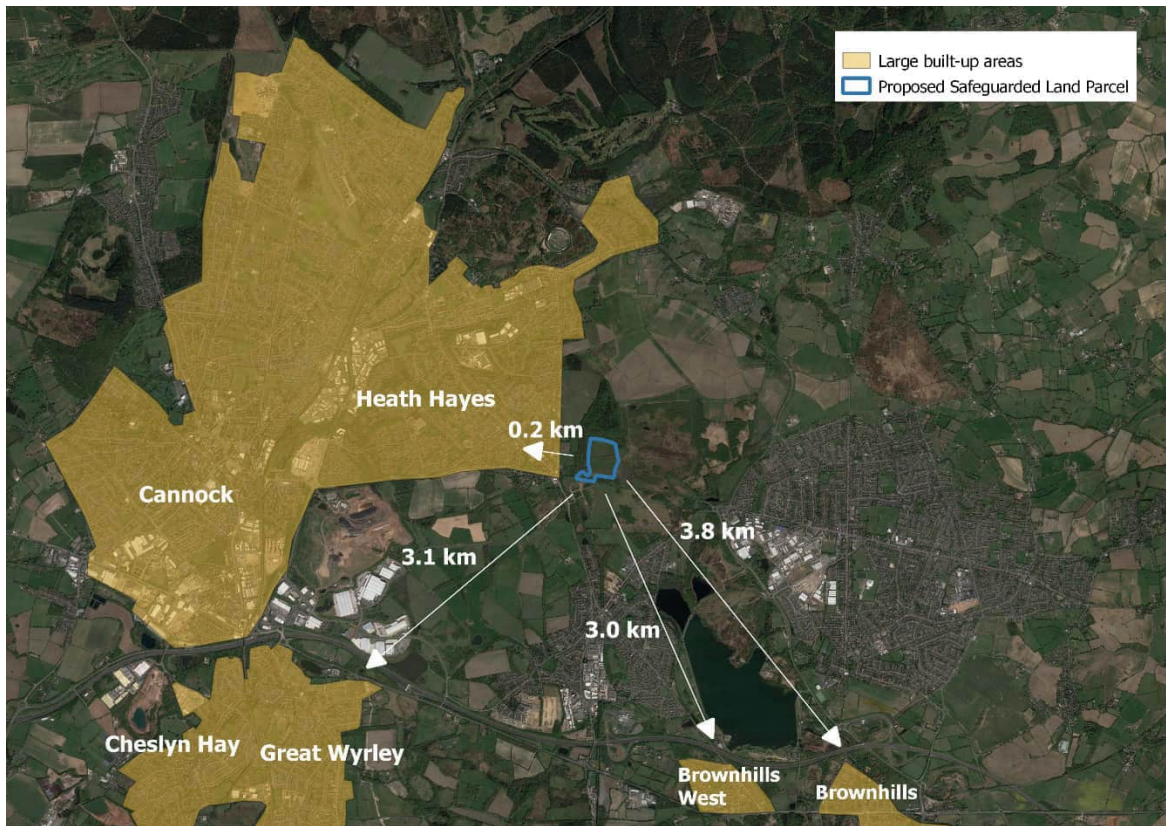
6 GREEN BELT ASSESSMENT OF PROPOSED SAFEGUARDED LAND PARCEL

Step 1: Consider the ‘relevance’ of each Green Belt purpose

Does the land have the potential to play a role with regard to Purpose 1: to check the unrestricted sprawl of large built-up areas?

- 6.1 On page 28 the 2021 LUC Green Belt Assessment defines the large built-up area as the main urban conurbation of Birmingham and associated towns and urban area of Cannock, Cheslyn Hay, Great Wyrley and Hednesford. Paragraph 3.33 notes that settlements deemed close enough to the ‘core’ urban area for development associated with them to be considered to be part of the large built-up area includes the town of Brownhills West.
- 6.2 It is noted that the previous 2016 LUC Assessment included a much broader definition of the large built-up area including ribbon development associated with all inset areas and industrial estates, business parks and gypsy and traveller sites. As stated at paragraph 3.34 of the 2021 LUC Assessment the definition of the large built-up area was tightened to focus on the major urban areas and to be consistent with the neighbouring Green Belt Studies covering the Black Country, South Staffordshire and Lichfield.
- 6.3 As set out on page 30 of the 2021 LUC Assessment Green Belt land has the potential to play a weaker role with regards to Purpose 1 if it is relatively close to the large built-up area, but intervening land provides a strong distinction. This is the case for the Proposed Safeguarded Land Parcel, as the wooded area to the west and north of the parcel provides strong distinction as shown on **Figure 4.7** below:

Figure 4.1: Purpose 1 Proposed Safeguarded Land Parcel



Does the land have the potential to play a role with regard to Purpose 2: to prevent neighbouring towns merging into one another?

6.4 Paragraphs 3.38 and 3.39 of the 2021 LUC Assessment defines Purpose 2 towns as:

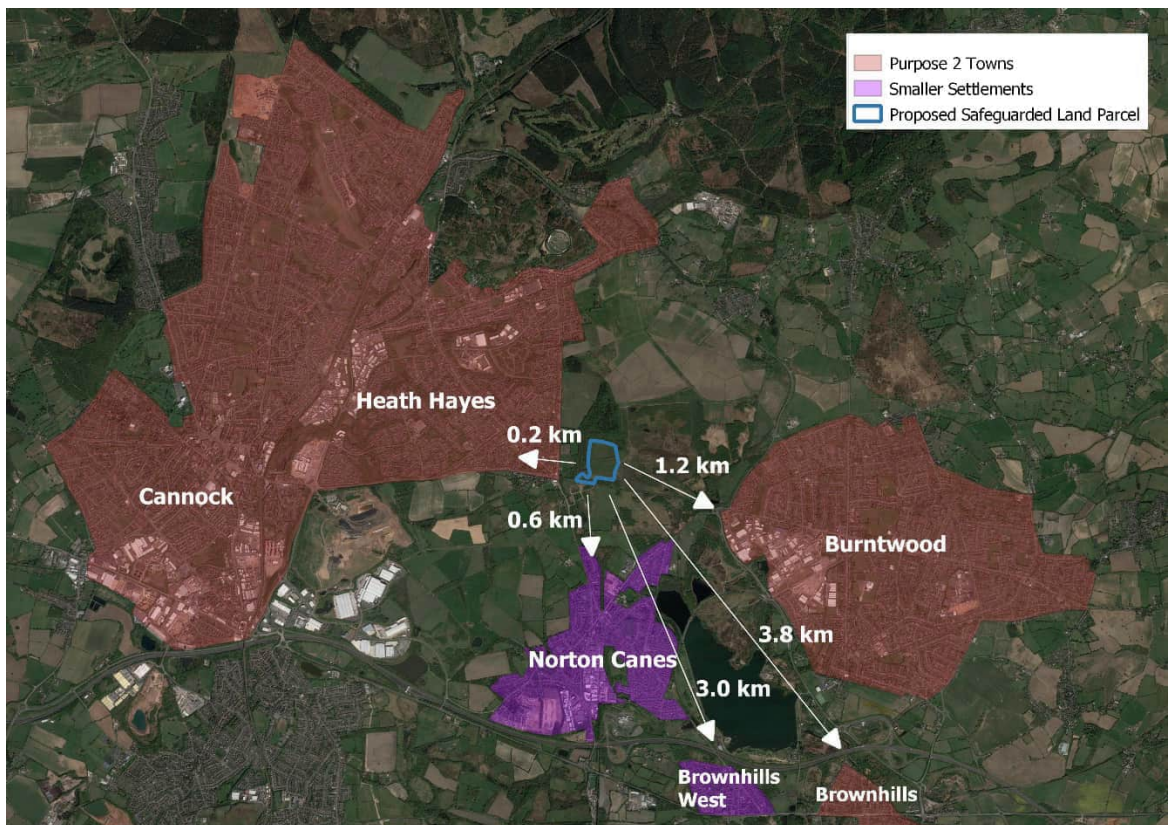
- The main urban area, grouped around Cannock, Hednesford and Heath Hayes;
- Rugeley;
- Burntwood;
- Brownhills; and
- Bloxwich.

6.5 Paragraph 3.40 of the 2021 LUC Assessment states that:

“Regardless of whether a particular settlement is large enough to realistically be considered a town, it is acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’. This was taken into account in the study.”

- 6.6 As such while neither Brownhills West nor Norton Canes are identified as a Purpose 2 town, RPS has considered as part of this assessment the relationship of the Site with these towns.
- 6.7 Pages 33 and 34 of the 2021 LUC Assessment states that Green Belt land has less potential to play a role with regards to Purpose 2 - i.e. gap is robust – if there is a wide gap between towns with some significant separating features. RPS consider this to be the case for the Proposed Safeguarded Land Parcel, although note that on page 53 of the Appendix B Detailed Harm Assessments Wimblebury and Heath Hayes that LUC considered this gap to be moderate in relation to the Proposed Allocated Land Parcel (WI12) with some significant separating features including Cuckoo Bank and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.
- 6.8 RPS note that no objective criteria are provided for assessing the relative strength of the gap between Purpose 2 Towns in the 2021 LUC Assessment, such as a measurement of distance. These points are illustrated by **Figure 4.8** below:

Figure 4.2: Purpose 2 Proposed Safeguarded Land Parcel



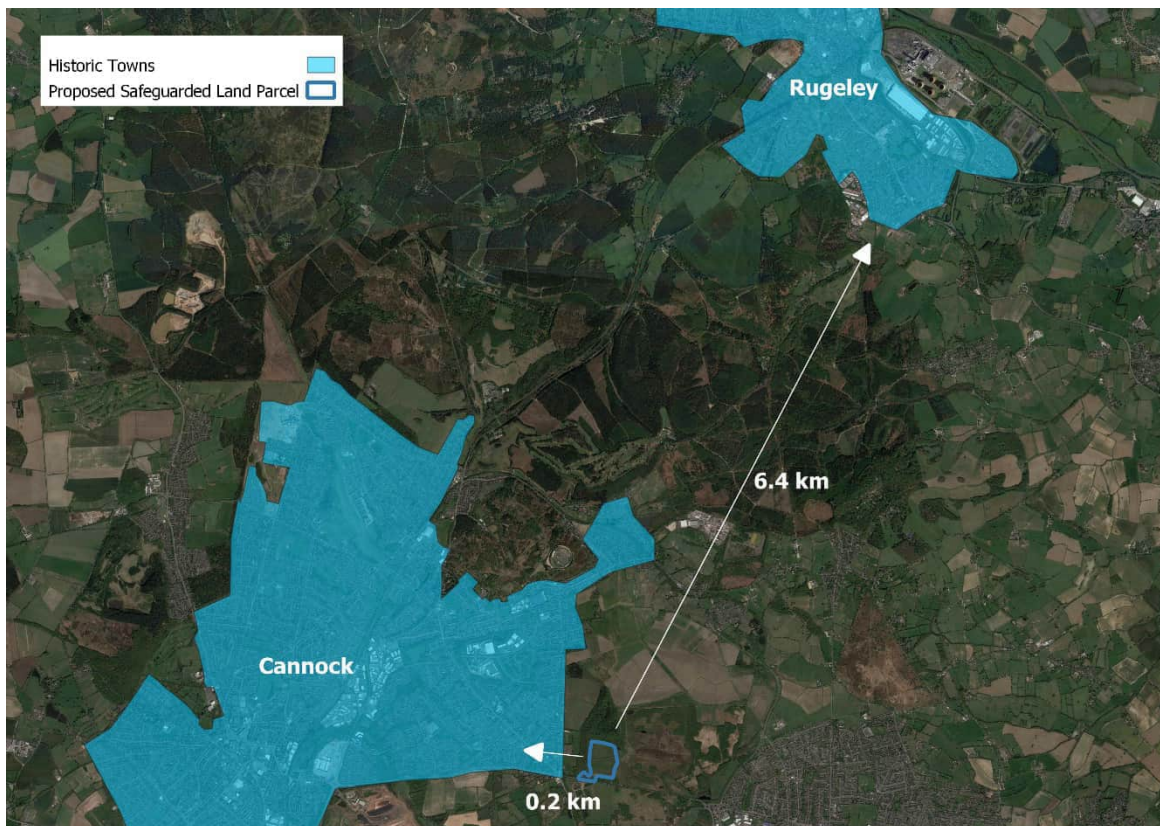
Does the land have the potential to play a role with regard to Purpose 3: to assist in safeguarding the countryside from encroachment?

- 6.9 As set out at paragraph 3.46 of the 2021 LUC Assessment this considers the extent to which land can be considered to constitute 'countryside' on the basis of its usage. It does not consider the impact of development which can be considered to reduce openness (in Green Belt terms), or of development which has a containing urbanising influence, as these are addressed in the analysis at Step 2 and Step 3 respectively.
- 6.10 Paragraph 3.47 of the 2021 LUC Assessment goes on to state that land may through its usage have a stronger relationship with the adjacent built up area and, as a result, not be considered 'countryside' to the same degree as other open land, but it is important not to stray from assessing the Green Belt purposes into assessing landscape character, sensitivity or value. Whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not taken into consideration: the poor condition of Green Belt land does not necessarily undermine its fundamental role of preventing urban sprawl by keeping land permanently open.
- 6.11 RPS consider the Proposed Safeguarded Land Parcel to be open countryside. As such the land has the potential to play a stronger role with regards to Purpose 3.

Does the land have the potential to play a role with regard to Purpose 4: to preserve the setting and special character of historic towns?

- 6.12 Paragraph 3.52 of the 2021 LUC Assessment states that it concluded that land around two settlements within Cannock Chase District – Cannock and Rugeley – should be considered for potential contribution to Purpose 4. The Site, and for the purposes of this assessment the Proposed Safeguarded Land Parcel, does not lie within these areas as shown on **Figure 4.9** below and so does not make a contribution towards Purpose 4.

Figure 4.3: Purpose 4 Proposed Safeguarded Land Parcel



Does the land have the potential to play a role with regard to Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?

6.13 Paragraph 3.57 of the 2021 LUC Green Belt Assessment notes that due to the nature of the settlement pattern within Cannock, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. As such the 2021 LUC Assessment assumes an even level of contribution to Purpose 5 for all areas of Green Belt based on the average availability of brownfield land across the District. On this basis all parcels of Green Belt land within the District, including the Proposed Safeguarded Land Parcel is considered to make a Strong contribution to Purpose 5.

Step 2: Identify variations in Green Belt openness

6.14 At paragraph 3.60 the 2021 LUC Assessment notes that the NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. Accordingly, it notes

that the presence of 'urbanising development' within the Green Belt can diminish the contribution of land to the Green Belt purposes.

- 6.15 Paragraph 3.61 of the 2021 LUC Assessment states that Green Belt openness relates to a lack of 'inappropriate built development' rather than visual openness; thus both undeveloped land which screened from view by landscape elements (e.g. tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms.
- 6.16 RPS agree with the statement on page 50 of the 2021 LUC Assessment that land without built form is open in Green Belt terms. As such RPS consider the Proposed Safeguarded Land Parcel to be open, as it is comprised of agricultural fields.

Step 3: Identify variations in the distinction between urban areas and the Green Belt

- 6.17 Paragraph 3.65 of the 2021 LUC Assessment states that having considered in general terms the variations in the relevance of each of the Green Belt purposes, the next step in the assessment process identifies more localised variations in the relationship between Green Belt land and urban development – i.e. whether the land seems like it is part of the urban area or the countryside.
- 6.18 Paragraph 3.66 of the 2021 LUC Assessment goes on to state that land that is more strongly related to urbanising development typically makes a weaker contribution to all of the first three Green Belt purposes, being less likely to be perceived: as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2), or encroaching on the countryside (Purpose 3). While paragraph 3.67 notes of the 2021 LUC Assessment notes that for Purpose 4 there is no separate consideration of distinction, because contrary to Purposes 1 to 3, land which has a strong relationship with the town is likely to make a greater rather than lesser contribution.
- 6.19 Paragraph 3.68 of the 2021 LUC Assessment sets out that the process of assessing distinction was carried out on a settlement by settlement basis, for each inset urban area. The analysis was applied as a progression out from each settlement edge, recognising that with distance from that settlement the level of distinction will only increase, not diminish. Notwithstanding our criticisms of the findings of the 2021 LUC Assessment for the adjacent parcel WI16, RPS agree in general with this approach.
- 6.20 Paragraph 3.69 of the 2021 LUC Assessment states that four interrelated elements were considered to assess distinction between land within the Green Belt and developed land. These are:
- Boundary features.
 - Landform and land cover;
 - Urbanising visual influence; and
 - Urban containment;

- 6.21 Consideration of these elements was combined, using professional judgement, to give a rating on a 4-point scale (weak, moderate, strong and very strong distinction).

Boundary features

- 6.22 Paragraph 3.72 of the 2021 LUC Assessment states that for land adjacent to an urban area the analysis only considered the urban boundary, but progressing further from the urban area, the cumulative impact of multiple boundary features increases distinction.
- 6.23 The Proposed Safeguarded Land Parcel is contained by linear tree cover to the west and north which is defined on page 53 of the 2021 LUC Assessment as being a moderate boundary. The southern boundary consists in part of Cannock Road, which forms a strong boundary due to level differences with the Proposed Safeguarded Land Parcel, while linear tree cover within the SSSI forms the south eastern boundary of the parcel, which also provides a strong boundary. The eastern boundary consists of the disused Coal Haulage Road, which itself provides a weak boundary.
- 6.24 The mixture of strong, moderate, and weak boundary features mean that it is considered that the overall boundary of the Proposed Safeguarded Land Parcel is moderate.

Landform and land cover

- 6.25 Paragraph 3.74 of the 2021 LUC Assessment notes that as well as landform and land cover serving as boundary features that this may extend into a broader feature which creates greater distinction. Examples are given of a woodland, lake or valley.
- 6.26 The woodland to the west and north of the site increases the distinction of the Proposed Safeguarded Land Parcel, as does the woodland and wider SSSI located to the south east and east of the Parcel.

Visual openness

- 6.27 Paragraph 3.75 of the 2021 LUC Assessment notes that this is not concerned with the scenic quality of views, but the extent to which an absence of visual association with the open Green Belt countryside or, conversely, the extent to which the visual dominance of urban development may increase association with the urban area.
- 6.28 The Proposed Safeguarded Land Parcel is visually contained by mature tree belts on its western and northern edge, but it is open along its eastern edge and so it is visually associated with the wider open Green Belt countryside.

Urban containment

- 6.29 This relates to whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area. The Proposed Safeguarded Land Parcel is partly contained by the recently constructed crematorium to the south of the parcel. As such the Proposed Safeguarded Land Parcel is contained on one side.

Distinction of the Site

- 6.30 The Proposed Safeguarded Land Parcel has as combination of strong and weak boundary features with surrounding areas. The Proposed Safeguarded Land Parcel is located adjacent to woodland to the north, west and south east which increase distinction. The Proposed Safeguarded Land Parcel is visually associated with the open Green Belt countryside to the east. Existing development to the south of the parcel provides a degree of urban containment. On the basis of the boundary features, adjacent landform, degree of urban containment and visual openness we consider that the overall level of distinction to be moderate.

Step 4: Assess the contribution of land to the Green Belt Purposes and define parcels

- 6.31 As set out at paragraph 3.81 of the 2021 LUC Assessment this step considers the analysis in each of the previous steps to identify overall contribution rating for each Green Belt purpose. Each area of variation in contribution to one or more of the purposes was defined as a parcel, with contribution ratings and supporting analysis.
- 6.32 For Green Belt Purposes 1, 2 and 3 the relevance (Step 1), openness (Step 2) and distinction (Step 3) are considered to arrive at a judgement on the relative contribution of different areas of land as described at paragraph 3.82 of the LUC 2021 Assessment. The same paragraph goes on to explain that contribution to the Green Belt purposes was rated on a 5-point scale (strong, relatively strong, moderate, relatively weak and weak/no contribution, in accordance with criteria lists on pages 59 to 67 of the 2021 LUC Assessment. It also notes that these criteria lists indicate typical combinations of relevance, openness and distinction, but professional judgement may result in the addition of particular weight to one of these elements.
- 6.33 For Purpose 4 paragraph 3.83 of the 2021 LUC Assessment explains that in accordance with advice from Historic England, judgements were based on specific analysis of the historic town in question, and its relationship with its Green Belt surroundings as set out in the criteria list for Purpose 4.
- 6.34 Paragraph 3.84 of the 2021 LUC Assessment notes that standard text is used to indicate that contribution to Purpose 5 is consistent across all of the study area.

- 6.35 For Purpose 1 paragraph 3.85 of the 2021 LUC Assessment notes that adjacent to settlements the assumption was made that the purpose will remain relevant at least until the level of distinction between the large built-up area and open land reaches a strong level. Beyond this the relevance, and therefore the contribution, will diminish.
- 6.36 Paragraph 3.86 of the 2021 LUC Assessment notes that in between settlements where Purpose 2 is relevant, contribution will likewise reduce at the periphery of the gap. Unlike Purposes 1 and 2, contribution to Purpose 3 will not diminish with distance from urban areas and will consequently be high for all land beyond those areas that do not have strong distinction from an urban area.

Contribution of the Proposed Safeguarded Land Parcel to the Green Belt Purposes

- 6.37 RPS consider that the Proposed Safeguarded Land Parcel consists of an area with a variation in contribution to one or more of the purposes and so should be defined as a parcel. The surrounding linear tree belts, act, hedgerows, and road act as boundary features that contain the parcel. Set out below is our assessment of the contribution of this parcel to each purpose in accordance with the criteria set out on page 59 to 67 of the LUC 2021 Assessment.

Purpose 1

- 6.38 As set out on page 30 of the 2021 LUC Assessment Green Belt land has the potential to play a weaker role with regards to Purpose 1 if it is relatively close to the large built-up area, but intervening land provides a strong distinction. This is the case for the Proposed Safeguarded Land Parcel, as the wooded area to the west of the parcel provides strong distinction. As such RPS consider the Proposed Safeguarded Land Parcel to make a moderate contribution purpose 1.

Purpose 2

- 6.39 RPS consider the Proposed Safeguarded Land Parcel to be open and lie within a robust gap between towns. RPS note that there are some significant separating features, including Cuckoo Bank and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI. The parcel has moderate distinction from the inset settlement edge.
- 6.40 On this basis RPS consider that the area makes a relatively weak contribution to Purpose 2.

Purpose 3

- 6.41 RPS consider the Proposed Safeguarded Land Parcel to be open countryside and that the parcel has some relationship with the inset area, but also moderate distinction from it. Overall, the area makes a relatively strong contribution to safeguarding the countryside from encroachment.

Purpose 4

- 6.42 The Proposed Safeguarded Land Parcel does not contribute to the historic setting or special character of either Cannock or Rugeley and so makes no contribution to Purpose 4.

Purpose 5

- 6.43 As set out paragraph 3.57 of the 2021 LUC Assessment all Green Belt land is considered to make an equal contribution to this purpose. While RPS do not completely agree with this point as we consider that previously developed land is capable of some development under paragraph 145 g) of the NPPF 2019 and so must make a weaker contribution to Purpose 5 than undeveloped open Green Belt Land, RPS consider that all undeveloped land, such as the Proposed Safeguarded Land Parcel, makes an equal contribution to this purpose.

Loss of contribution

- 6.44 As set out at paragraph 3.90 of the 2021 LUC Assessment the loss of contribution to the Green Belt purposes as a result of the release of a parcel of land equates to the contribution ratings assessed for that parcel.
- 6.45 Paragraph 3.91 of the 2021 LUC Assessment notes that in cases where release of a parcel would also, in order to form an expansion of the inset settlement, necessitate the release of intervening land, the loss of contribution is that associated with the highest contributing parcel. It is proposed that access to this parcel would be secured through the development of the Proposed Allocated Land Parcel, which makes a weaker contribution and so does not increase this assessment. While this access would be via the Woodland that lies between the two parcels, it is not proposed that this Woodland is released from the Green Belt. Indeed, it is suggested that the Woodland be retained as Green Belt and used to provide compensatory improvements to the environmental quality and accessibility of the Green Belt.

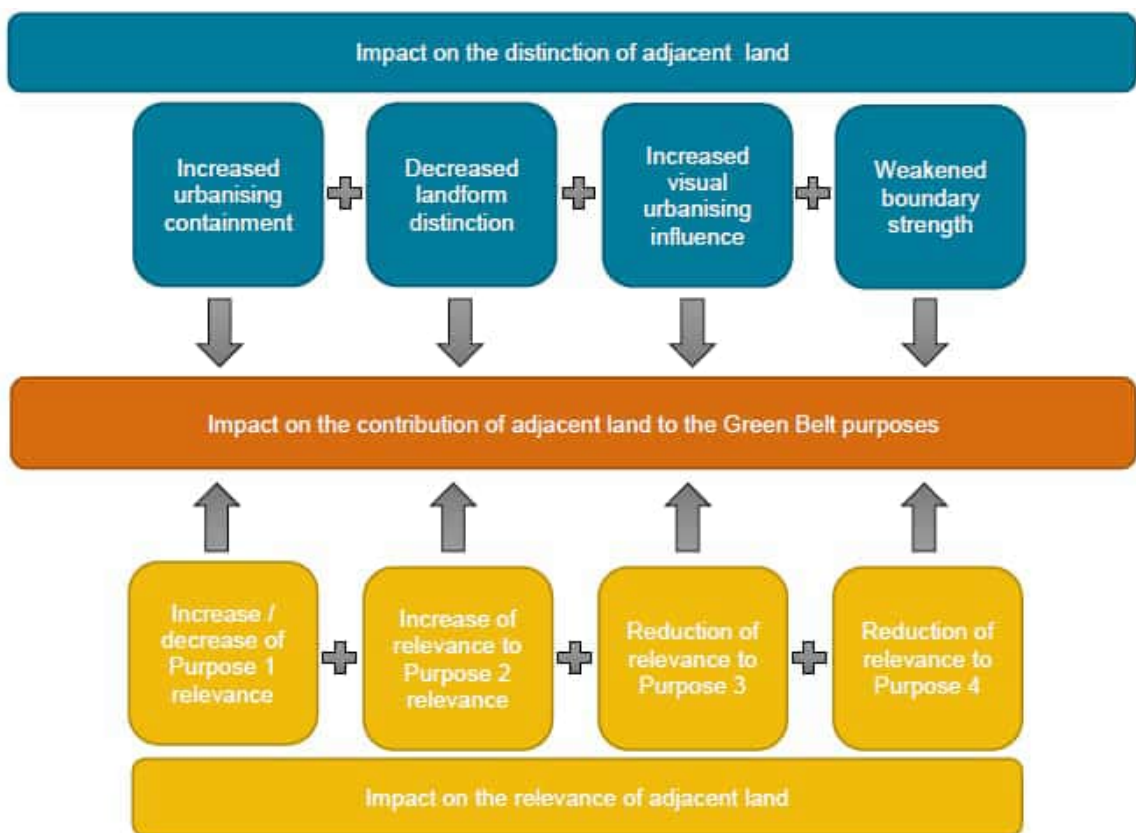
Step 5: Assess additional impact of release on adjacent Green Belt

- 6.46 As noted earlier, paragraph 3.93 of the 2021 LUC Assessment defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land / parcels being assessed for potential release.
- 6.47 Paragraph 3.94 goes on to state that the assessment of the additional impact of the release of land on adjacent Green Belt land considered two factors: the impact on the distinction (from inset areas) of the adjacent land and the impact on the relevance of the adjacent land to the NPPF purposes.

The third factor, openness, is not relevant to the assessment of impact on adjacent land as it is assumed that adjacent land will remain open. **Figure 4.11** below which is Figure 3.3 in the 2021 LUC Assessment illustrates the elements to be considered when assessing the impact of the release on adjacent Green Belt land.

6.48 It should be noted that this approach is unusual and not consistent with RPS’s substantial experience of undertaking and reviewing Green Belt Assessments elsewhere, however to ensure constituency and aid in allowing the findings of this assessment to be compared with the 2021 LUC Assessment we have followed the same methodology.

Figure 4.4: Variations in impact on release of adjacent land



Impact on distinction

6.49 The release of the Proposed Safeguarded Land Parcel would increase the urban containment of the land to west of the parcel and so would weaken the distinction of adjacent Green Belt land. Therefore, it would affect the contribution of adjacent land to Green Belt Purposes and so the harm of the release of the Proposed Safeguarded Land Parcel would increase on this basis.

Impact on relevance

- 6.50 The release of the Proposed Safeguarded Land Parcel would not lead to adjacent land becoming close enough to the inset edges of the large built-up area or lead to adjacent retained Green Belt land becoming perceived as being within the large built-up area. Hence, its release would not affect any adjacent land with regards to its relevance for Purpose 1 as explained at paragraph 3.99 of the 2021 LUC Assessment. It would also not lead to any substantial change in the settlement gap and so would not change the relevance of Purpose 2 for adjacent parcels of land as set out at paragraph 3.100 of the 2021 LUC Assessment.
- 6.51 Paragraph 3.101 notes that the relevance of adjacent retained Green Belt land to purpose 3 would rarely be affected. Its release would not result in adjacent land becoming contained to the extent that it is too isolated from the wider Green Belt to be considered part of the countryside.
- 6.52 Adjacent Green Belt land does not make a contribution to Purpose 4 and so the release of the Proposed Allocation Land Parcel would not harm the relevance of adjacent parcels of Green Belt in keeping with the approach set out in paragraph 3.102 of the 2021 LUC Assessment.

Level of impact on adjacent land

- 6.53 RPS consider that on the basis of the methodology set out on pages 73 to 76 of the 2021 LUC Assessment that the release of the Proposed Safeguarded Land Parcel would have a minor impact on adjacent Green Belt land. However as noted above RPS consider this approach to be unusual and not consistent with our substantial experience of undertaking and reviewing Green Belt Assessments elsewhere.

Step 6: Define variations in harm to the Green Belt around the inset edge

Assessment of harm

- 6.54 RPS consider the contributions to the purposes of the Green Belt considered to be made by the Proposed Safeguarded Land Parcel to be:
- a moderate contribution to Purposes 1;
 - a relatively weak contribution to Purpose 2;
 - a relatively strong contribution to Purpose 3
 - no contribution to Purpose 4.
- 6.55 RPS note that the combination of these contributions and a minor impact on adjacent Green Belt land is not given as an example in the benchmarks the benchmarks set out on pages 79 to 80 of the

2021 LUC Assessment. However, it would appear to sit between the examples given for moderate-high and moderate harm.

6.56 Furthermore, as noted above RPS question the approach to assessing impact on adjacent parcels and note that the characteristics of WI13 such as its heavily wooded nature, and connection to the SSSI mean that it is unlikely to be recommended for release from the Green Belt even if the Proposed Safeguarded Land Parcel is developed. As such we question the contention that increasing the urban containment of WI13 in this particular circumstance would diminish the role of WI13 as an inset edge boundary and suggest therefore that the level of harm of releasing the Proposed Allocated Land Parcel should only at most be assessed as moderate.

6.57 The nature and characteristics of these parcels will therefore ensure that the boundary between these and the Proposed Safeguarded Land Parcel can endure in the future. This would be in accordance with paragraph 136 of the National Planning Policy Framework 2019 (NPPF) which states:

“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”

6.58 **Table 4.2** below provides a summary of our assessment.

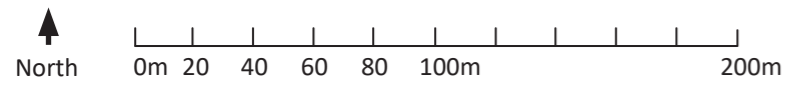
Table 4.1: Summary of Findings for Proposed Safeguarded Land Parcel

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Wimblebury and Heath Hayes	Release of Proposed Safeguarded Land Parcel as an expansion of Wimblebury and Heath Hayes	6.1	Moderate	Relatively Weak	Relatively Strong	No	Equal	Moderate



Land use summary

Site area:	17.9 ha (44.2 acres)
Primary road:	1.0 ha (2.5 acres)
Net development:	10.2 ha (25.2 acres)
Open space:	6.7 ha (16.6 acres)



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- KEY:**
- Land within TW control: 52.6 ha
 - Proposed Site Allocation SH2 East of Wimblebury Road: 17.9 ha
 - Land available for possible future development: 11.4 ha
 - Open space
 - Primary loop road and 2m footpaths
 - Secondary road

- Residential development
- Building frontages
- Play area
- Attenuation ponds
- 3m combined footpath/cycleway
- 2m off-road footpath

- Proposed tree planting
- Semi-natural landscape treatment
- Primary vehicular access
- Pedestrian access points

Date: 20.04.21
Drawn by: SB
Checker: SB
Rev by:
Rev checker:
QM Status: Checked
Product Status: Issue

Taylor Wimpey

Wimblebury Road, Cannock

Illustrative Masterplan

Drwg No: 643A 13

Scale: 1: 2500 @ A2