

WATLING STREET - SITE SPECIFIC GREEN BELT ASSESSMENT

Prepared for St. Modwen Logistics

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REPORT

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Jacob Bonehill



18 March 2024

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Prepared by:

RPS

Prepared for:

St Modwen Logistics

EXECUTIVE SUMMARY

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 Watling Street Business Park and adjacent land (the Site) under the sole control of St. Modwen Logistics 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 Business Park Parcel and the Expansion Land Parcel, based on differences in the use and character of the two areas.

For the Business Park Parcel this Assessment finds that the level of harm associated with its release would be very low harm.

For the Expansion Land Parcel this Assessment finds that the level of harm associated with its release would be very low harm.

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1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd (RPS) are instructed by St. Modwen Logistics (St. Modwen) to represent their interests in the context of the preferred options consultation on the Cannock Chase Local Plan (the Plan) with regards to the Watling Street Business Park 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 employment purposes. The Assessment forms part of the representations prepared by RPS on behalf of St. Modwen 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 did not assess the Site in isolation but instead included it within a much larger area OA14. However, an earlier assessment also prepared by LUC in 2016, the Cannock Chase Green Belt Study (the 2016 LUC Assessment), did assess the undeveloped part of the Site in detail as part of a wider parcel. While the 2016 LUC Assessment followed a different methodology to the 2021 LUC Assessment the approach taken to the assessment of how sites performed with regards to their contribution to the five purposes of the Green Belt is comparable. As such we have drawn upon the findings of the 2016 LUC Assessment where appropriate to inform the Assessment of the Site.
- 1.5 The Council published a topic paper regarding the exceptional circumstances justifying green-belt release in 2023
- 1.6 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;
 - Additional Findings of the 2023 Green Belt Topic Paper
 - Conclusions.

2 OVERVIEW OF THE SITE

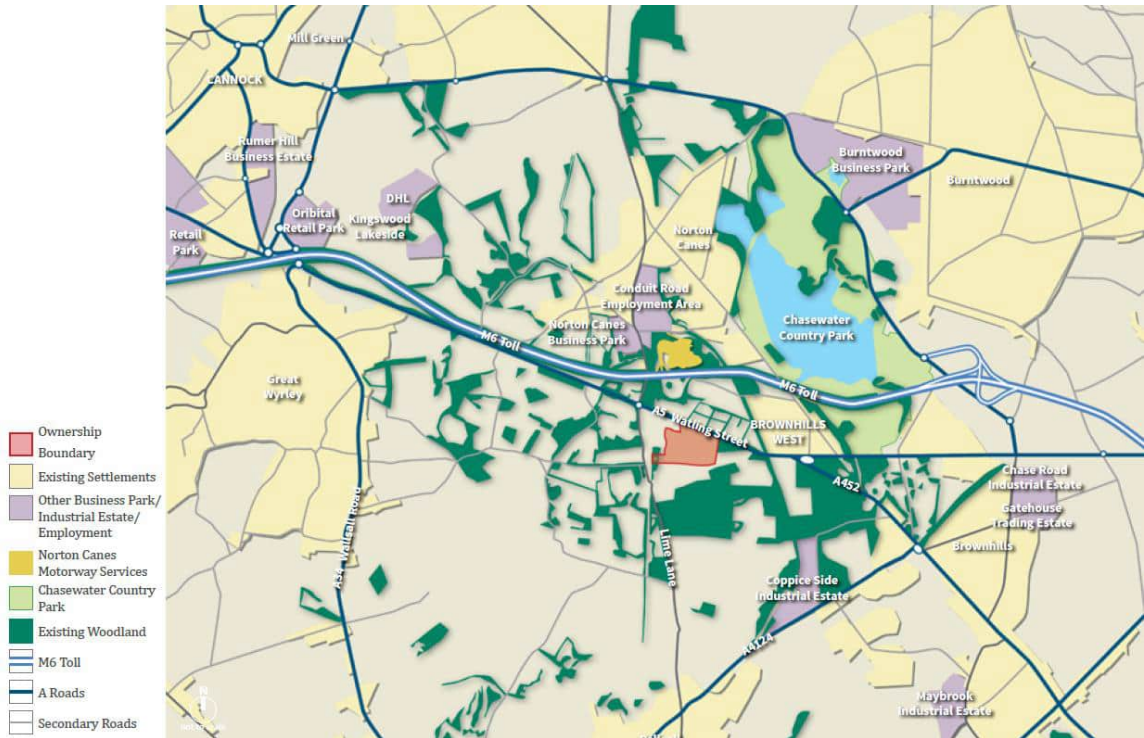
Location

- 2.1 The Site covers around 11.55 ha of land and lies to the south of Watling Street (A5), to the south east of Cannock and to the south west of the town of Brownhills West. It consists of the 6.3 ha Business Park and 8.99 ha expansion land to the south and west.
- 2.2 The Site lies to the south of the Cannock Chase District within Southern Staffordshire. It is conveniently located off the strategic highways network, directly to the south of the A5 Watling Street and in close proximity to the M6 (Toll).
- 2.3 Within the surrounding area Brownhills is situated 0.4km away to the east, whilst Norton Canes lies 0.5km away to the north. Other settlements nearby include Great Wyrley and Cannock (approximately 2.5km to the west) whilst Pelsall lies 2km to the south. A range of commercial and industrial estate developments are present within the surrounding area by the outskirts of existing settlements.
- 2.4 Cannock Extension Canal lies in close proximity to the west of the Site. Norton Canes Moorings, an existing business, is situated to the west of the Canal at North Lanes.
- 2.5 As well as the existing Business Park on Watling Street, other developments nearby include and Esso Garage adjacent to the north western boundary of the Site, Moss Farm/Farm Shop and the public house by the Watling Street/Walsall Road roundabout.
- 2.6 The Site is visually well screened from all of the existing settlements in the local area. Established tree belts are present along the entire perimeter of the Site and there are substantial woodlands present through the surrounding landscape.
- 2.7 **Figure 2.1** shows the Site boundary edged in red. **Figure 2.2** shows the Site context.

Figure 2.1: Site Location



Figure 2.2: Site Context



Site Description

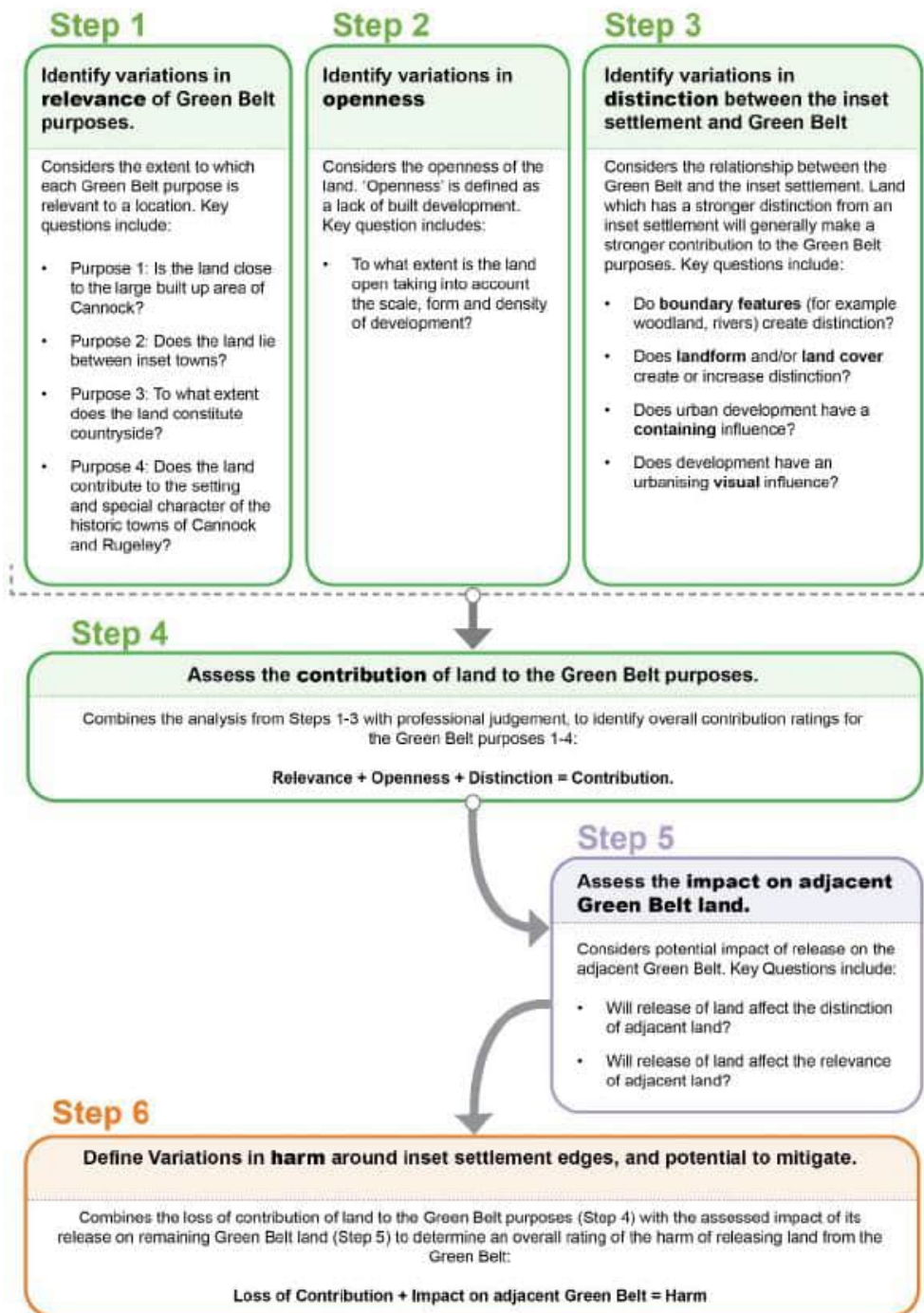
- 2.8 The whole Site is owned by St Modwen including the existing Watling Street Business Park along with expansion land situated immediately to the south and west of the Business Park.
- 2.9 The Business Park (6.3 ha) currently provides over 150,000 square feet (13,935m²) of warehousing, offices and open storage, accommodating a range occupiers and uses including furniture making, bicycle repair shop, vehicle electronics/repair, lease vehicle repair/ maintenance, caravan/motorhome showroom, medical gases/equipment supplier, and a recycling facility for IT equipment. An open storage facility is currently located within the southern part of the existing Business Park.
- 2.10 The main entrance and access into the Site is off the A5 Watling Street with an internal circulation road serving particular units/buildings.
- 2.11 Established tree belts/hedgerows are present along the perimeter of the Business Park, and around the pond located at the south eastern corner of the Business Park. Consequently, the existing buildings are well screened from the surrounding area.
- 2.12 The expansion land (8.99 ha) adjoining the Business Park comprises of 5 fields currently in agricultural use. The field boundaries are very well defined by an established framework of hedgerows and tree belts, and generally intact aside from small gaps for agricultural accesses.

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.

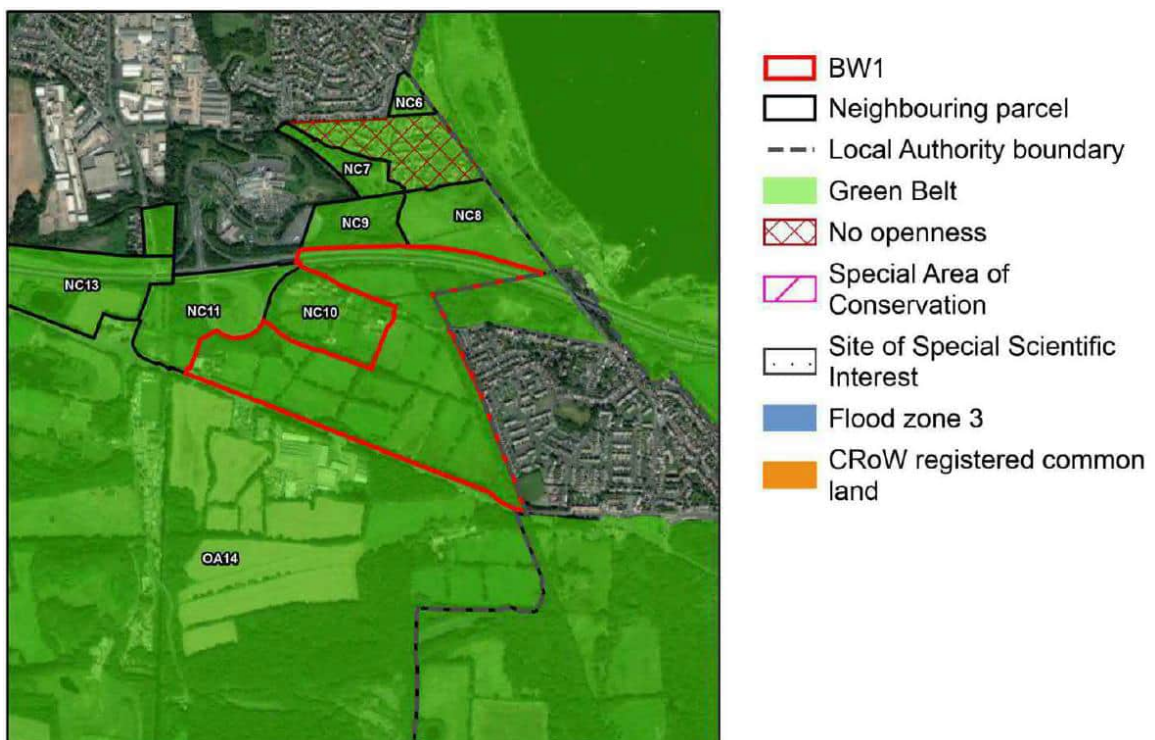
Figure 3.1: Green Belt Assessment Methodology



Distinction

- 3.2 RPS do not agree with LUC’s position with regards to defining the Site 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 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 BW1 which lies to the north of Watling Street Business Park on the opposite side of the A5 is shown on **Figure 3.2** below which is taken from the 2021 LUC Assessment:

Figure 3.2: Parcel BW1



- 3.6 With regards to distinction of parcel BW1 Appendix B Brownhills West states:

“The parcel has some limited containment by washed-over inset development to the north and south, and landform and land cover within the parcel do not create distinction from Brownhills West. However, the thick tree line to the east is a strong boundary feature creating separation from the settlement, and the parcel extends a reasonable distance from the inset area. A strong

hedgerow structure within the parcel means that views are dominated by open countryside. Therefore, there is strong distinction between the parcel and the urban area.”

- 3.7 RPS disagree that the features identified amount to a strong distinction from the urban area. In particular we note that linear tree cover is given as an example of a moderate boundary feature on page 53 of the 2021 LUC Assessment. We also note that washed-over development to the north and the south of the parcel contribute to containment which reduces distinction as per paragraph 3.78 of the assessment. In relation to views paragraph 3.76 of the 2021 LUC Assessment states that caution should be used when considering views, on the basis that seasonal variations and boundary maintenance regimes can have a significant impact. Given this we question the degree to which the hedgerow structure within the parcel prevents views of the urban area and washed over development during the winter.
- 3.8 Given the points above RPS consider that parcel BW1 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

- 3.9 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**)*
- 3.10 RPS contend that this criticism can be applied to the assessment of the outer area parcels identified in the LUC 2021 Assessment. Particularly in the case of the Site, where the presence of the existing Watling Street Business Park, Esso Garage, and North Lanes provide significant urban containment.
- 3.11 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**)*
- 3.12 RPS note that LUC appear to have interpreted the above to mean immediately adjacent to inset areas. There are two issues with this, firstly the Inspector does not refer to inset areas, but to urban areas which should include urban areas currently washed over by the Green Belt such as Watling Street Business Park. If assessments are only to consider potential development sites adjacent to inset areas then they fail to consider urban areas currently washed over by the Green Belt, such as

Watling Street Business Park, despite such areas making little or no contribution to the purposes of the Green Belt due to their existing urban nature.

- 3.13 Secondly, LUC appear 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.
- 3.14 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 Site can still be in close proximity to the urban areas while not being immediately next to said urban areas.
- 3.15 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 Site.

4 SITE SPECIFIC GREEN BELT ASSESSMENT OF THE SITE

Parcels to be assessed

- 4.1 While RPS consider that there is merit in assessing both the business park and expansion land as one parcel, we note that this would not be consistent with the approach taken in the 2021 LUC Assessment and so have subdivided the Site into these two parcels as shown on **Figures 4.1** and **4.2** below:

Figure 4.1: Business Park Parcel



Figure 4.2: Expansion Land Parcel



4.2 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.

Green Belt Assessment of Business Park Parcel

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

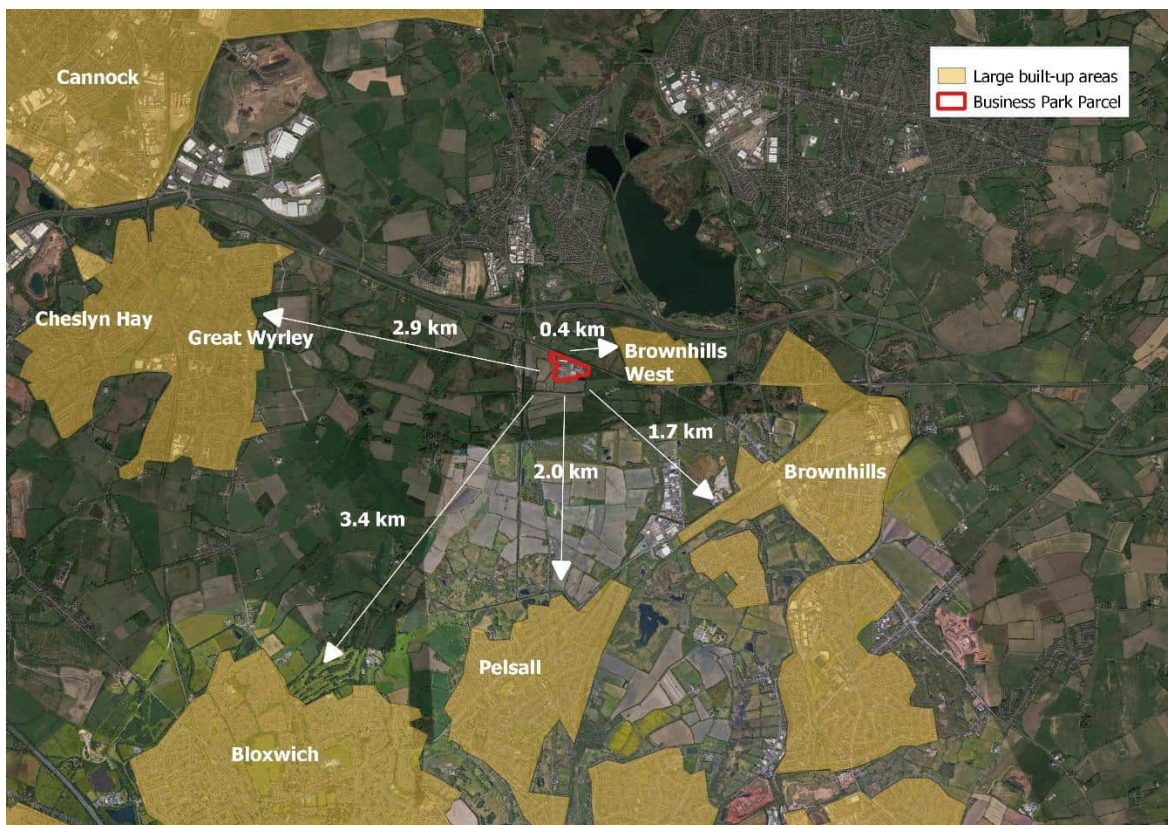
Does the land have the potential to play a role with regard to Purpose 1: to check the unrestricted sprawl of large built-up areas?

4.3 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.

4.4 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.

4.5 As set out on page 30 of the 2021 LUC Assessment Green Belt land does not play a role with regards to Purpose 1 if it is not close enough to the large built-up area to be associated with it. This is the case for the Business Park Parcel as shown on **Figure 4.3** below:

Figure 4.3: Purpose 1 Business Park Parcel



4.6 RPS also note that the land is not open and so cannot contribute to Purposes of the Green Belt as per the assessment criteria set out on page 61 of the 2021 LUC Green Belt Assessment.

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

4.7 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.

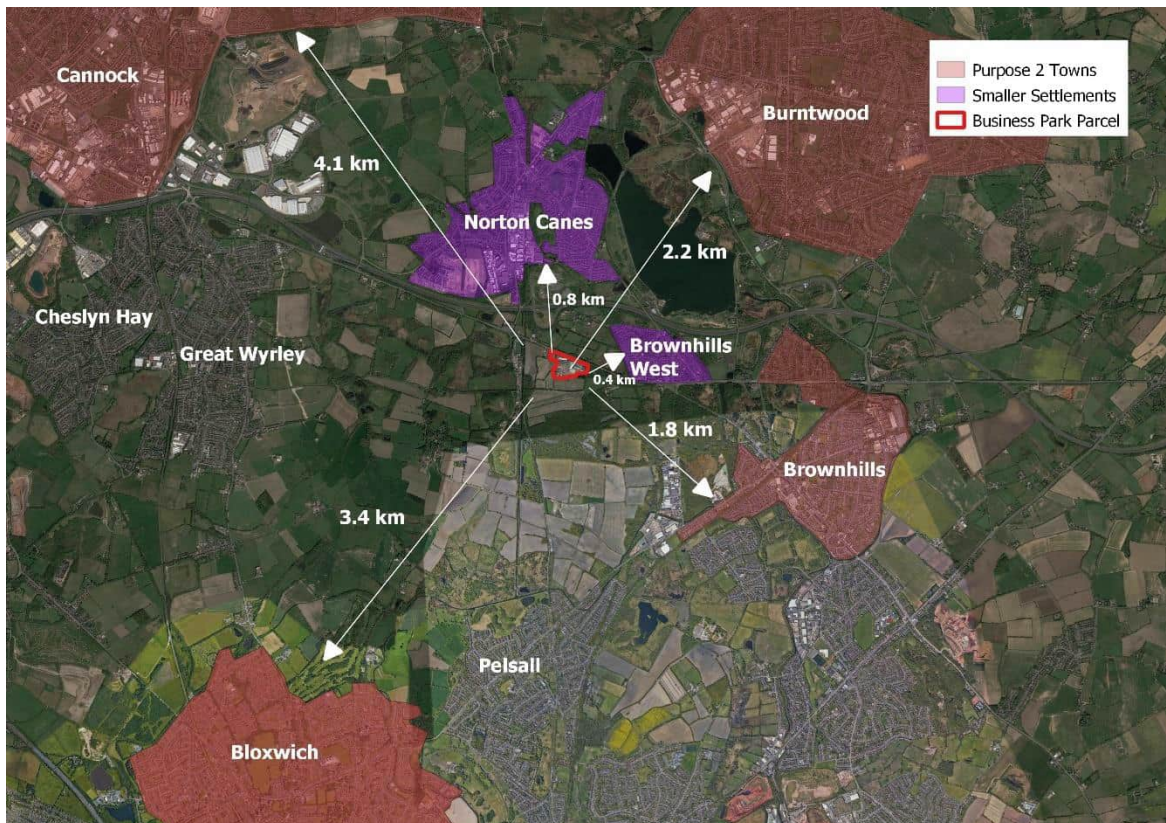
4.8 Paragraph 3.40 of the 2021 LUC Assessment states that:

“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.”

4.9 As such while neither Brownhills West or Norton Cranes are identified as a Purpose 2 town, RPS has considered as part of this assessment the relationship of the Site with these towns.

4.10 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. Urbanising development reduces gaps but there are some significant separating features. This is the case for the Business Park Parcel if it is considered to be located within the wide gaps between Burntwood and Bloxwich, and Cannock and Brownhills. The Expansion Land Parcel is not located within the gap between Brownhills West and Norton Cranes. These points are illustrated by **Figure 4.4** below:

Figure 4.4: Purpose 2 Business Park Parcel



4.11 However, RPS note that as per the criteria on page 63 of the 2021 LUC Assessment the Business Park parcel is not open and so cannot contribute to the purposes of the Green Belt.

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

4.1 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 it’s usage. It does not consider the impact of development which can be considered to reduce openness (in Green Belt terms), or of

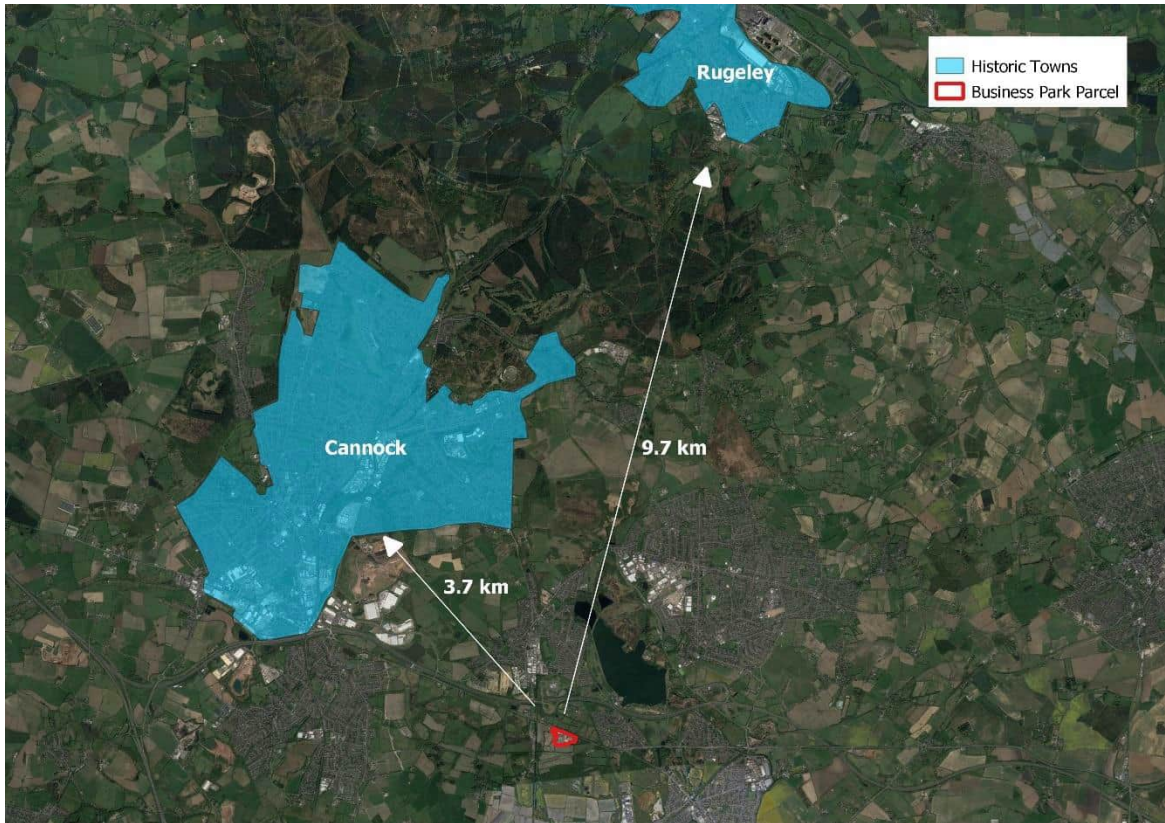
development which has a containing urbanising influence, as these are addressed in the analysis at Step 2 and Step 3 respectively.

- 4.2 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.
- 4.3 As set out on page 65 of the 2021 LUC Assessment the Business Park Parcel is not open as it is entirely urban in character and so it cannot contribute to the purposes of the Green Belt.

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?

- 4.4 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 Business Park Parcel, does not lie within these areas and so does not make a contribution towards Purpose 4 as shown on **Figure 4.5** below:

Figure 4.5: Purpose 4 Historic Towns



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?

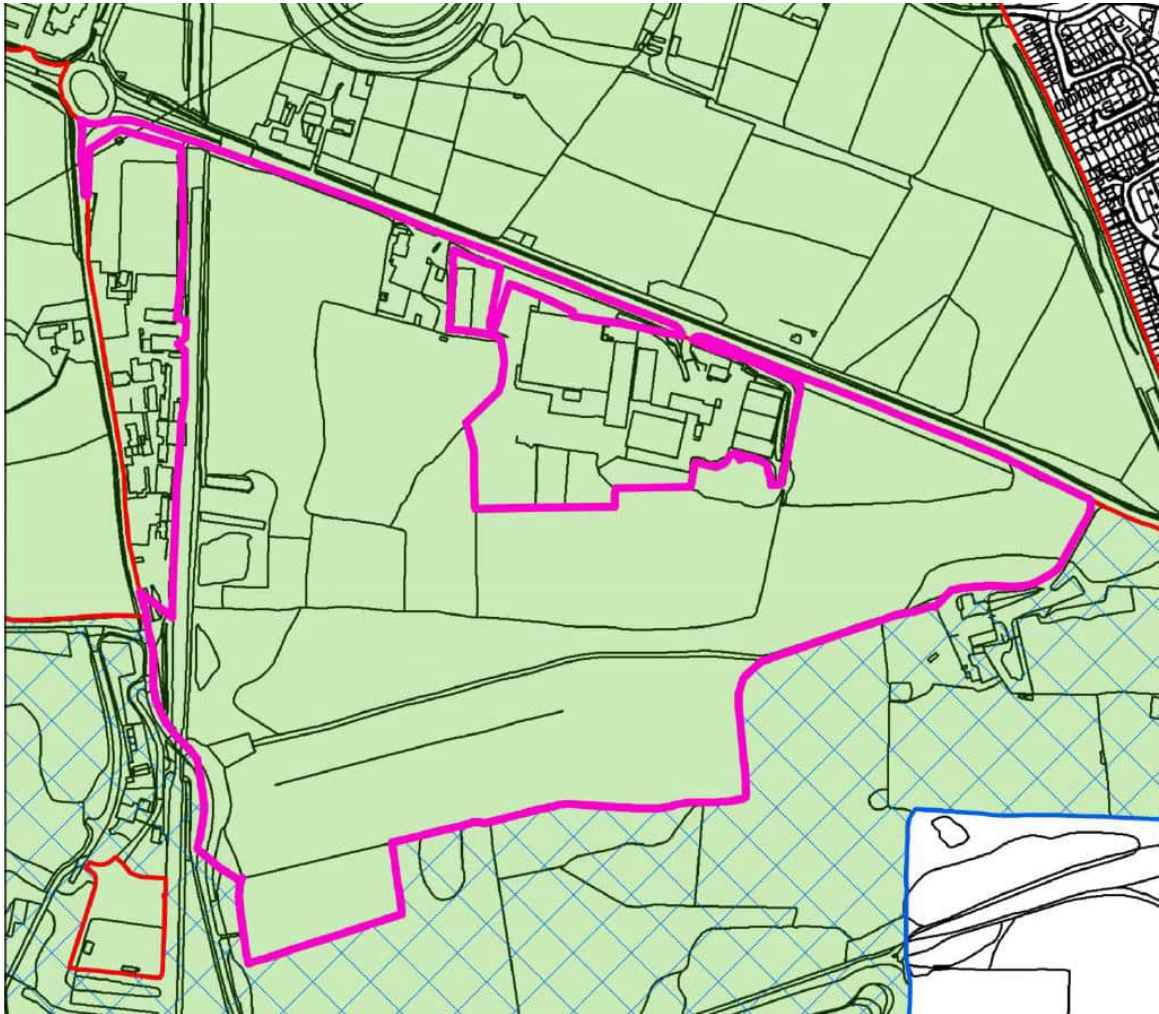
- 4.5 Paragraph 3.57 of the 2021 LUC Green Belt Assessment notes that due to the nature of the settlement pattern within Cannock, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. As such the 2021 LUC Assessment assumes an even 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 Business Park Parcel is considered to make a Strong contribution to Purpose 5.
- 4.6 While RPS recognise the general position that all land in the Green Belt contributes towards this purpose, we note that this is the case for undeveloped land. On previously developed land within the Green Belt redevelopment is considered to be appropriate development subject to not having a greater impact upon openness of the existing Green Belt as per paragraph 145 g) of the NPPF 2019 is capable of development. As such previously developed land makes a weaker contribution to encouraging the recycling of derelict and other urban land as it is capable of development, albeit the level of development that such land is capable of accommodating, and therefore it’s contribution to Purpose 5 will vary depending on the degree to which it can be considered open. Given that the Business Park Parcel is developed the only impact that it’s redevelopment would have on openness

is that of surrounding land as it is not in itself open. Therefore RPS consider that the Business Park Parcel only makes a weak contribution to this purpose.

Step 2: Identify variations in Green Belt openness

- 4.7 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.
- 4.8 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. Accordingly the 2021 LUC Assessment of openness first considers the appropriateness of development. Where development is not 'appropriate', it considers the extent, scale, form and density of development, in order to make a judgement on the degree of openness.
- 4.9 Paragraph 3.63 goes on to state that at a very localised scale, any inappropriate development can be considered to diminish openness, but small areas of isolated development have negligible impact in this respect, and are not therefore defined and assessed as separate parcels of land. Any larger areas of Green Belt land which are judged to be developed to an extent that they lack the 'essential characteristic' of openness are considered to make no contribution to Green Belt purposes. It states that these are defined and mapped.
- 4.10 Paragraph 3.64 of the 2021 LUC Assessment states that the locations defined as outer areas of the Green Belt by the 2021 were not assessed with regards to openness and were assumed to be open, as the assessment of these areas was high level and strategic. Given this the 2021 LUC Assessment has not made a judgement as to whether or not the Business Park Parcel is a larger parcel that lacks the 'essential characteristic' of openness as areas of this type within the outer areas have not been assessed. However the 2016 LUC Assessment excluded the Business Park Parcel from the assessment of the parcel that contains the Site as shown on **Figure 4.6** below:

Figure 4.6: 2016 LUC Assessment Parcel



- 4.11 On this basis RPS assume that LUC concluded in 2016 that the Business Park Parcel lacked the 'essential characteristic' of openness due to the presence of the Business Park which is 'inappropriate development' in the Green Belt and was of the scale that meant it makes no contribution to Green Belt purposes. RPS consider this to still be the case and so have undertaken this assessment on the same basis. It should also be noted that the Preferred Options Sustainability Appraisal, and earlier versions of the Sustainability Appraisal, have subdivided the Site on the same basis.
- 4.12 Should it be subsequently considered that the Business Park Parcel is not large enough to merit the subdivision of the Site on this basis RPS recommend that an updated Green Belt Assessment and Sustainability Appraisal is undertaken of the Site in its entirety.

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

- 4.13 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.

- 4.14 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.
- 4.15 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 BW1, RPS agree in general with this approach.
- 4.16 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;
- 4.17 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

- 4.18 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.
- 4.19 The Business Park Parcel is primarily contained by mature well treed hedgerow defined on page 53 of the 2021 LUC Assessment as being a moderate boundary, apart from along part of its northern edge when it is accessed from the A5. Page 53 of the 2021 LUC Assessment notes that main roads are also an example of a moderate boundary. As such the Site is contained by moderate boundary features.

Landform and land cover

- 4.20 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 Business Park Parcel.

Visual openness

- 4.21 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.
- 4.22 The business park is urban in character and therefore has no visual association with the open Green Belt countryside.

Urban containment

- 4.23 This relates to whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area. This does not apply to the business park as it is already entirely urban in character.

Distinction of the Site

- 4.24 The Business Park Parcel has moderate boundary features with surrounding areas. The Business Park Parcel does not contain landforms or land cover that contribute to distinction. The business park has no visual association with the open Green Belt countryside. On the basis of the boundary features and given the urban nature of the Business Park Parcel we consider that the overall level of distinction is only weak.

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

- 4.25 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.
- 4.26 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.
- 4.27 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.

- 4.28 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.
- 4.29 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.
- 4.30 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 Business Park Parcel to the Green Belt Purposes

- 4.31 RPS consider that the Business Park 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

- 4.32 The Business Park Parcel is not open and so makes no contribution to Purpose 1.

Purpose 2

- 4.33 The Business Park Parcel is not open and so makes no contribution to Purpose 2.

Purpose 3

- 4.34 The Business Park Parcel is not open and so makes no contribution to Purpose 3.

Purpose 4

- 4.35 The Business Park 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

- 4.36 Paragraph 3.89 of the 2021 LUC Assessment states that all Green Belt land is considered to make strong contribution to Purpose 5. However, RPS consider that as previously developed land the Business Park Parcel is capable of some development under paragraph 145 g) of the NPPF 2019 it must make a weaker contribution to Purpose 5 than undeveloped open Green Belt Land

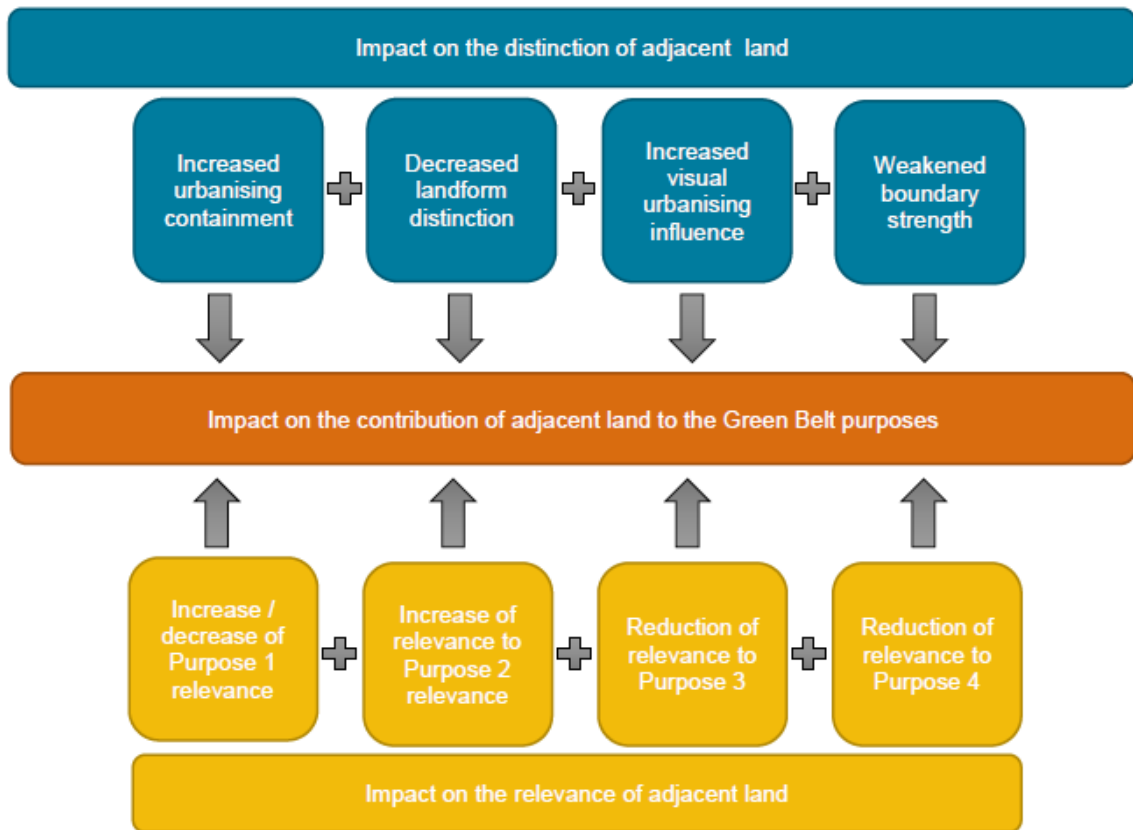
Loss of contribution

- 4.37 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.
- 4.38 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 Business Park Parcel.

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

- 4.39 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.
- 4.40 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.
- 4.41 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 4.7: Variations in impact on release of adjacent land



Impact on distinction

4.42 The release of the Business Park Parcel would not cause any of the identified impacts and so would not weaken the distinction of adjacent Green Belt land. Therefore, it will not affect the contribution of adjacent land to Green Belt Purposes and so the harm of the release of the Business Park Parcel would not increase on this basis.

Impact on relevance

4.43 The release of the Business Park 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, it’s 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.

4.44 Paragraph 3.101 notes that the relevance of adjacent retained Green Belt land to purpose 3 would rarely be affected. It’s 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.

4.45 Adjacent Green Belt land does not make a contribution to Purpose 4 and so the release of the Business Park 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

4.46 Overall the release of the Business Park Parcel would only have a negligible impact on adjacent Green Belt land as it would not impact the distinction of adjacent Green Belt land or relevance of this land to Green Belt purposes as per the guidance notes and examples set out on pages 73 to 76 of the 2021 LUC Assessment.

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

Assessment of harm

4.47 RPS notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm at the level of moderate – low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower.

4.48 RPS consider the Business Park Parcel to make no contributions to Purposes 1 to 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment.

4.49 As noted above RPS consider the Business Park Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm, then this would still result in an overall assessment of very low harm.

4.50 If it is considered that the Business Park Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the release of the Business Park Parcel would result in moderate harm.

4.51 **Table 4.1** below provides a summary of our assessment:

Table 4.1: Summary of findings for Business Park Parcel

| Settlement | Release Scenario | Area (ha) | Purpose 1 Rating | Purpose 2 Rating | Purpose 3 Rating | Purpose 4 Rating | Purpose 5 Rating | Harm Rating |
|-----------------|---------------------------------|-----------|------------------|------------------|------------------|------------------|------------------|-------------|
| Brownhills West | Release of Business Park Parcel | 6.33 | No | No | No | No | Weak | Very Low |

Green Belt Assessment of Expansion 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?

- 4.52 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.
- 4.53 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.
- 4.54 As set out on page 30 of the 2021 LUC Assessment Green Belt land does not play a role with regards to Purpose 1 if it is not close enough to the large built-up area to be associated with it. This is the case for the Expansion Land Parcel as shown on **Figure 4.8** below:

Figure 4.8: Purpose 1 Expansion 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?

4.55 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.

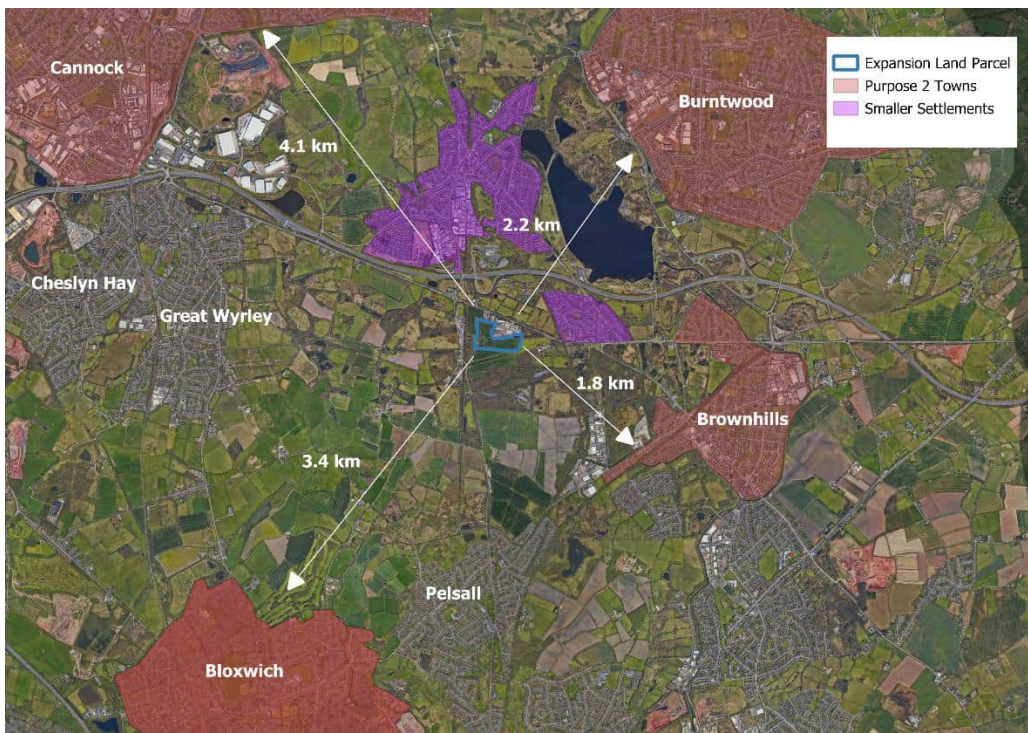
4.56 Paragraph 3.40 of the 2021 LUC Assessment states that:

“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.”

4.57 As such while neither Brownhills West or Norton Cranes are identified as a Purpose 2 town, RPS has considered as part of this assessment the relationship of the Site with these towns.

4.58 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. Urbanising development reduces gaps but there are some significant separating features. This is the case for the Expansion Land Parcel if it is considered to be located within the wide gaps between Burntwood and Bloxwich, and Cannock and Brownhills. The Expansion Land Parcel is not located within the gap between Brownhills West and Norton Cranes. These points are illustrated by **Figure 4.9** below:

Figure 4.9: Purpose 2 Expansion Land Parcel



- 4.59 It should be noted that the 2016 LUC Assessment did not consider the wider area in which the Expansion Land Parcel was located to make any contribution to this purpose, stating:

“The parcel lies to the south of Watling Street Business Park, not a settlement. Therefore, while the wider Green Belt does contribute to preventing neighbouring towns from merging, in isolation, this parcel does not.”

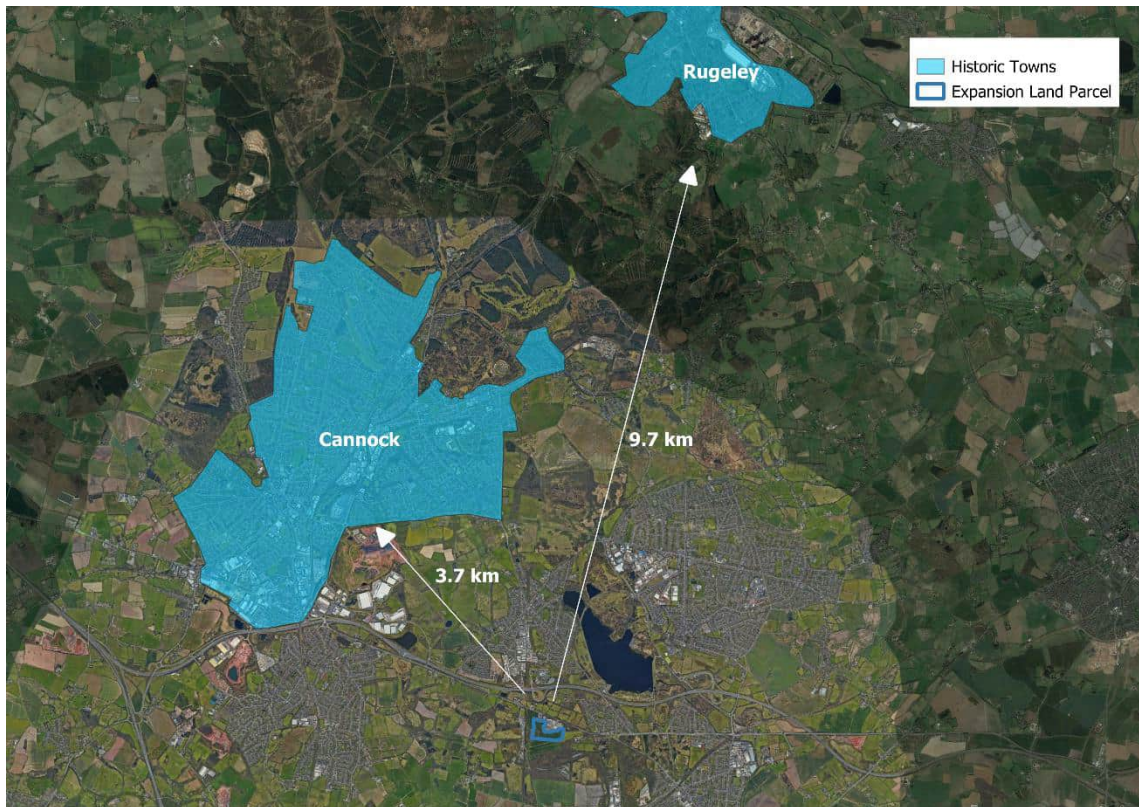
Does the land have the potential to play a role with regard to Purpose 3: to assist in safeguarding the countryside from encroachment?

- 4.60 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.
- 4.61 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.
- 4.62 As set out on page 36 of the 2021 LUC Assessment Green Belt land has the potential to play a stronger role with regards to Purpose 3 if its use is not associated with the urban area. The Expansion Land Parcel is in agricultural use and so 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?

- 4.63 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 Expansion Land Parcel, does not lie within these areas as shown on **Figure 4.10** below and so does not make a contribution towards Purpose 4.

Figure 4.10: Purpose 4 Historic Towns



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?

4.64 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 Expansion Land Parcel is considered to make a Strong contribution to Purpose 5.

Step 2: Identify variations in Green Belt openness

4.65 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.

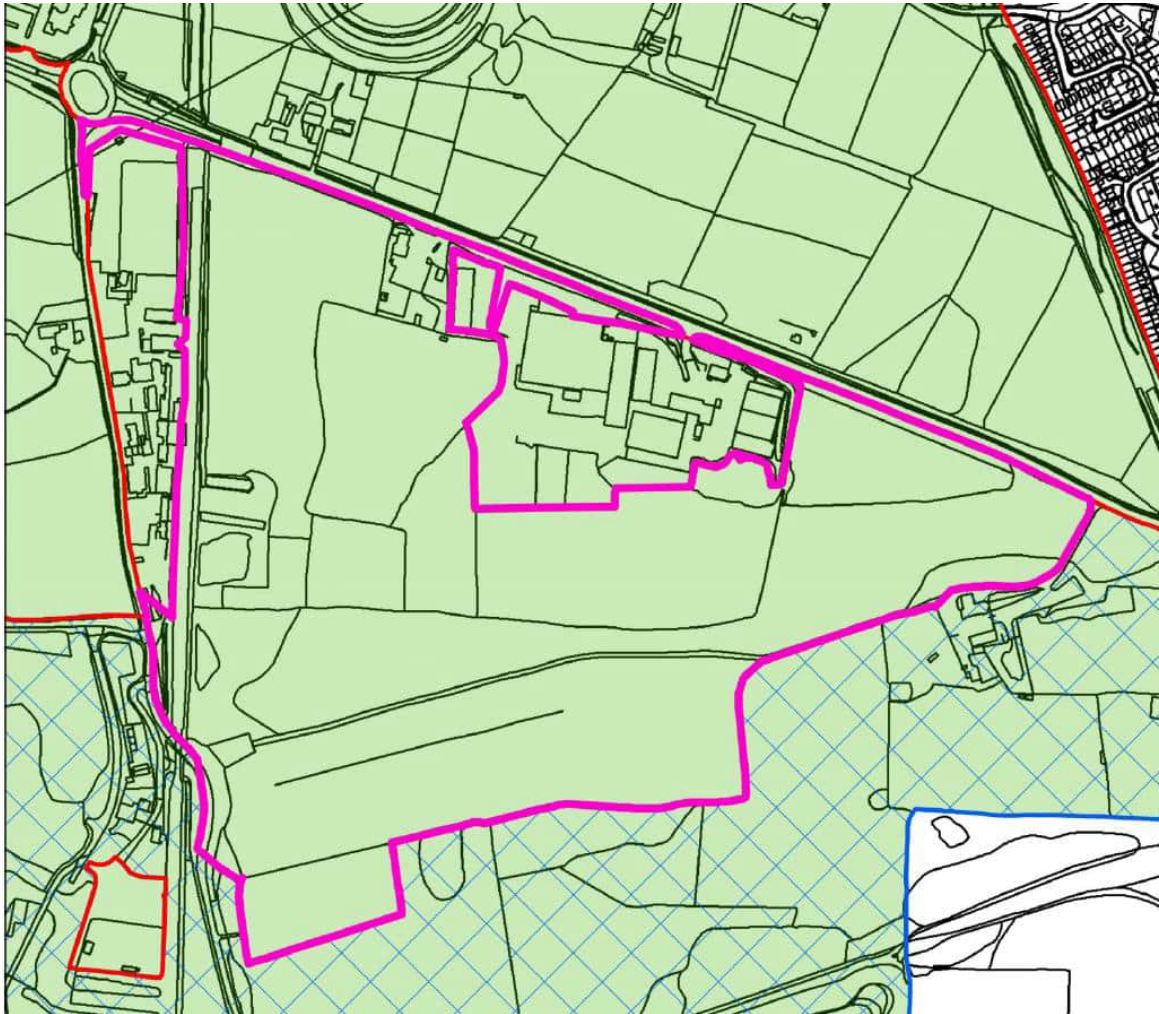
4.66 Paragraph 3.61 of the 2021 LUC Assessment states that Green Belt openness relates to a lack of 'inappropriate built development' rather than visual openness; thus both undeveloped land which screened from view by landscape elements (e.g. tree cover) and development which is not

considered 'inappropriate', are still 'open' in Green Belt terms. Accordingly, the 2021 LUC Assessment of openness first considers the appropriateness of development. Where development is not 'appropriate', it considers the extent, scale, form and density of development, in order to make a judgement on the degree of openness.

4.67 Paragraph 3.63 goes on to state that at a very localised scale, any inappropriate development can be considered to diminish openness, but small areas of isolated development have negligible impact in this respect, and are not therefore defined and assessed as separate parcels of land. Any larger areas of Green Belt land which are judged to be developed to an extent that they lack the 'essential characteristic' of openness are considered to make no contribution to Green Belt purposes. It states that these are defined and mapped.

4.68 Paragraph 3.64 of the 2021 LUC Assessment states that the locations defined as outer areas of the Green Belt by the 2021 were not assessed with regards to openness and were assumed to be open, as the assessment of these areas was high level and strategic. Given this the 2021 LUC Assessment has not made a judgement as to whether or not the Expansion Land Parcel is a larger parcel that lacks the 'essential characteristic' of openness as areas of this type within the outer areas have not been assessed. However, the 2016 LUC Assessment assessed the Expansion Land Parcel as part of a wider parcel as shown on **Figure 4.11** below:

Figure 4.11: 2016 LUC Assessment Parcel



4.69 On the basis of the approach taken in 2021 LUC Assessment the Expansion Land is 'open' in Green Belt terms as there is no built form.

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

4.70 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.

4.71 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.

- 4.72 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 BW1, RPS agree in general with this approach.
- 4.73 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;
- 4.74 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

- 4.75 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.
- 4.76 The Expansion Land Parcel is primarily contained by mature well treed hedgerow and linear tree cover defined on page 53 of the 2021 LUC Assessment as being a moderate boundary. The south western boundary is bordered by a more heavily wooded area which forms a strong boundary, especially given the canal beyond. wRPS consider this boundary to be strong as in accordance with the criteria on page 53 of the 2021 LUC Assessment which states:
- “Physical feature significantly restricts access and forms constant edge.”*
- 4.77 A very small part of the parcel boundary adjacent to the north wooded area along the west of the Site is a weak boundary as there are is no significant physical definition.
- 4.78 Given that the moderate boundary features are the predominant boundary feature it is considered that the overall boundary of the Expansion Land Parcel is moderate.

Landform and land cover

- 4.79 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.
- 4.80 There is a woodland located in the south western corner of the Expansion Land Parcel, while a pond is located in the north eastern part of the parcel. However, both of these features cover only a small part of the Expansion Land Parcel and so landform and land cover does not significantly increase the level of distinction.

Visual openness

- 4.81 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.
- 4.82 The Expansion Land Parcel is visually contained by mature tree belts and so it is not visually associated with the wider open Green Belt countryside.

Urban containment

- 4.83 This relates to whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area. The Expansion Land Parcel is contained by the existing urban development at Watling Street Business Park and the Esso Garage immediately to the north and North Lanes to the west on the opposite side of the canal. As such the Expansion Land Parcel is contained on two sides.

Distinction of the Site

- 4.84 The Expansion Land Parcel has predominantly moderate boundary features with surrounding areas. The Expansion Land Parcel does contain landforms or land cover that contribute to distinction, but these features – a pond and a woodland – are only cover a small area and do not make a substantial contribution to the distinction of this parcel. The Expansion Land Parcel is visually contained from the open Green Belt countryside. On the basis of the boundary features and the moderate level of urban containment we consider that the overall level of distinction is only weak.

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

- 4.85 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.
- 4.86 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.

- 4.87 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.
- 4.88 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.
- 4.89 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.
- 4.90 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 Expansion Land Parcel to the Green Belt Purposes

- 4.91 RPS consider that the Expansion 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 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

- 4.92 The Expansion Land Parcel is not close to a large built-up area and so makes no contribution to Purpose 1.

Purpose 2

- 4.93 RPS contend that the substantial distance between towns and the presence of urbanising development means that the Expansion Land Parcel does not lie between neighbouring towns and so makes no contribution to Purpose 2.

- 4.94 If the Expansion Land Parcel is considered to lie between neighbouring towns then it is open, lies within a robust gap and has weak distinction from the inset settlement edge and so on this basis would make a weak contribution to Purpose 2.

Purpose 3

- 4.95 The Expansion Land Parcel is open and land use is not associated with the urban area. It has weak distinction from the inset settlement edge and so makes a relatively weak contribution to Purpose 3.

Purpose 4

- 4.96 The Expansion 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

- 4.97 Paragraph 3.89 of the 2021 LUC Assessment states that all Green Belt land is considered to make strong contribution to Purpose 5.

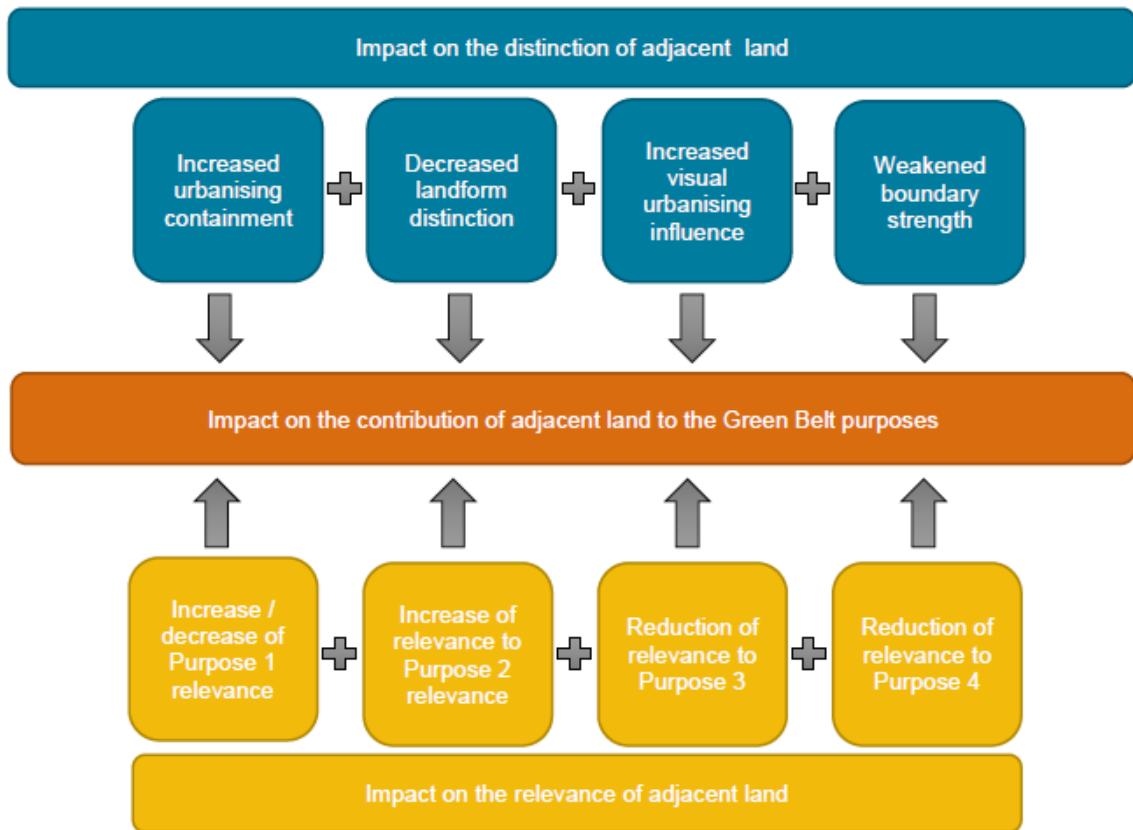
Loss of contribution

- 4.98 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.
- 4.99 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 Expansion Land Parcel.

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

- 4.100 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.
- 4.101 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 4.12** 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.
- 4.102 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 4.12: Variations in impact on release of adjacent land



Impact on distinction

4.103 The release of the Expansion Land Parcel would increase the urban containment of the land to west between the parcel and the canal 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 Business Park Parcel would increase on this basis.

Impact on relevance

4.104 The release of the Expansion 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, it's 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.

4.105 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 that it is too isolated from the wider Green Belt to be considered part of the countryside.

4.106 Adjacent Green Belt land does not make a contribution to Purpose 4 and so the release of the Expansion 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

4.107 Paragraph 3.103 of the 2021 LUC Assessment states that the level of harm from the release of a parcel only increases if the adjacent land makes a stronger contribution to Green Belt purposes than the land within the parcel that is being released.

4.108 RPS have not produced separate assessments of all adjacent Green Belt land and the 2021 LUC Assessment included the adjacent land within the same outer area as the Expansion Land Parcel. However, RPS consider that the adjacent parcels that have not been assessed to only make the same level of contribution to the purposes of the Green Belt as the Expansion Land Parcel. As such the release of the Expansion Land Parcel would not impact on land that makes a greater contribution to the purposes of the Green Belt.

4.109 It should also be noted that the 2016 LUC Assessment assessed the Expansion Land Parcel and adjacent parcels as part of one parcel. While there are differences in the methodology used by the 2021 LUC Assessment and 2016 LUC Assessment, this combining of the Expansion Land Parcel with adjacent parcels suggests that the contribution made by the adjacent parcels is similar to that of the Expansion Land Parcel.

4.110 Overall, the release of the Expansion Land Parcel would only have a negligible impact on adjacent Green Belt land as it would not impact the distinction of adjacent Green Belt land or relevance of this land to Green Belt purposes as per the guidance notes and examples set out on pages 73 to 76 of the 2021 LUC Assessment.

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

Assessment of harm

4.111 RPS notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm at the level of moderate – low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower.

4.112 RPS consider the Expansion Land Parcel to make a relatively weak contributions to Purpose 3 and no contribution to purposes 1, 2, and 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment.

- 4.113 As noted above RPS consider the Expansion Land Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm then this would still result in an overall assessment of very low harm.
- 4.114 If it is considered that the Expansion Land Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the release of the Expansion Land Parcel would result in moderate harm.
- 4.115 **Table 4.2** below provides a summary of our assessment:

Table 4.2: Summary of Findings for Expansion Land Parcel

| Settlement | Release Scenario | Area (ha) | Purpose 1 Rating | Purpose 2 Rating | Purpose 3 Rating | Purpose 4 Rating | Purpose 5 Rating | Harm Rating |
|-----------------|----------------------------------|-----------|------------------|------------------|------------------|------------------|------------------|-------------|
| Brownhills West | Release of Expansion Land Parcel | 8.99 | No | No | Relatively Weak | No | Weak | Very Low |

5 GREEN BELT TOPIC PAPER 2024

- 5.1 Following the Cannock Chase Council Cabinet meeting on 14 December 2023; the Council published its updated Cannock Chase Local Plan Pre-Submission consultation document on the 5th of February 2024. As part of this publication, the evidence base was updated to include an additional Green-Belt Topic Paper. The updated topic paper assessed whether exceptional circumstances for the release from the Green Belt apply in line with the policies of the National Planning Policy Framework.
- 5.2 Though the expansion land parcel was not assessed as an individual parcel in the 2021 Green Belt Assessment, the 2024 topic paper does consider its release from the Green Belt and argues that exceptional circumstances apply on the following grounds:
- The contribution to employment needs across the plan period, given that there are insufficient employment sites within the built-up urban areas of the district.
 - The development of the additional expansion land parcel will in turn support the regeneration of the business park parcel.
 - The extension land parcel benefits from existing access due to its relationship with the business park parcel. This in turn limits the impact of the release of the land.
 - The additional release of land offers the opportunity to enhance the biodiversity and infrastructure links to the Cannock Extension Canal SAC and to Wyrley Common.
- 5.3 Whilst RPS concur with the ultimate findings of the topic paper and its support for the release of the expansion land parcel at Watling Street Business Park as part of Site Allocation SE2, it is noted that it remains the case that the council has not reviewed the parcels in line with the methodology of the LUC assessment, therefore the RPS assessment acts as the sole review of the contribution of the parcels to the Green-Belt purposes.
- 5.4 It is therefore recommended that regard be given to this assessment.