

Lichfield District Council Green Belt Review 2019 Annex A



August 2019

Prepared by Lichfield District Council

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1.0: Method statement consultation (Stage 5a) – comments and response

1.1 The following table sets out the responses received from those duty to cooperate stakeholders who responded to the method statement consultation which was undertaken with those stakeholders with whom the council has a duty to cooperate in February 2019.

Stakeholder	Comments	Response to comments
Birmingham City Council	Have no comments or observations to add.	Comment noted. No changes to methodology made as a result of response.
Cannock Chase Area of Outstanding Natural Beauty (AONB)	<p>The Method Statement sets out the stages and identification of land parcels that will be subject to assessment under Green Belt review, illustrated on Figure 3. These include smaller parcels adjacent to settlements, and larger areas of predominantly undeveloped open countryside where a broader assessment is proposed. AONB concerns relate mainly to assessment and potential release of the smaller parcels around Upper Longdon and north of Burntwood, although there would be interest in the result of assessment of larger parcel BA8 and BA9 where they are in close proximity to the AONB boundary. I note Figure 3 shows the AONB, but only to the extent of where it falls within Lichfield District. It would be appropriate for context to indicate the full extent of the AONB in the neighbouring authority, and consider the implications of potential release of Green Belt land on the AONB as a whole.</p> <p>Several small land parcels lie directly adjacent to the AONB boundary, within the setting of the AONB. At present their status as Green Belt in safeguarding the countryside from encroachment and in the case of Upper Longdon preserving the setting and special character of the village, contribute fundamentally to the character and reinforce the setting of the AONB. The AONB Partnership would want to resist potential erosion of the setting of the AONB as an indirect result of Green Belt release and therefore request that the methodology for assessment considers the contribution these areas of Green Belt make to the setting of the AONB. The Partnership therefore warmly welcome Appendix A,</p>	<p>The Green Belt Review will provide an assessment of parcels against Green Belt criteria. It will not itself propose alterations to the Green Belt, this can only be done in exceptional circumstances through the review of a local plan.</p> <p>Figure 1 is extracted from the strategic growth study and illustrates the wider extent of the Green Belt within the housing market area. It is not considered necessary to show the AONB outside the district boundary as the study only relates to land within the district boundary.</p> <p>Comments regarding 'Appendix A' are noted. Alongside the Green Belt Review the district council will be commissioning a detailed landscape character assessment as part of the evidence supporting the local plan review. Such evidence will assist in understanding the setting of parcels.</p> <p>No changes to methodology made as a result of response.</p>

Stakeholder	Comments	Response to comments
	<p>Table 1: Parcel /area Assessment Form, where it refers to assessment of contribution to the setting of the AONB. Review of land parcels abutting or close to the AONB boundary needs to be robust, therefore a landscape and visual assessment, by a landscape practitioner, is recommended to help to assess the site's contribution to the setting of the AONB and potential impact of development. The assessment could also consider whether mitigation would be feasible and could contribute to the setting of the AONB and enhance its scenic qualities and natural beauty.</p>	
<p>Cannock Chase District Council</p>	<p>CCDC Officer comments on Green Belt Assessment</p> <ol style="list-style-type: none"> 1. Support principle of update to inform Local Plan Review. Would welcome continued involvement in the assessment process. 2. In relation to the assessment of purposes a) and b) in the Table 1 assessment form, it may be helpful to clarify what are classed as the 'large built up areas' and 'town' in the Lichfield District context. 3. Will be helpful for the study to have regard to the findings of neighbouring LPA assessments when considering parcels that lie on District boundaries in order to ensure consistency/clear narrative. 4. May be useful for the study to consider if any smaller parcels should be defined within the broad areas given the changed context and studies that have been completed since the previous study and those that are now underway. This could help ensure cross boundary consistency. For example, the Cannock Chase Green Belt Study identifies a number of smaller parcels along its boundaries with Lichfield District (partly due to the fact there have been cross boundary site proposals suggested 	<p>Support noted.</p> <p>Noted. The methodology has been updated to provide definitions for 'large built up areas' and 'towns' within the context of the district.</p> <p>Noted. The methodology has been devised to be consistent with approaches to green belt review work within neighbouring authorities and across the housing market area.</p> <p>Comments noted. The methodology has been revised and the approach to parcel/area identification includes the identification of smaller parcels along the edge of settlements beyond the District's boundaries. It is considered this approach is consistent with good practice.</p>

Stakeholder	Comments	Response to comments
	<p>in these areas). The GL Hearn identifies areas of search for proportionate dispersal development/urban extensions in and around the Lichfield/Cannock/Walsall urban edges. The Black Country and South Staffordshire Green Belt Study is now also underway. It would perhaps be useful to meet to discuss this further ahead of the wider consultation.</p>	
Staffordshire County Council	<p>Regarding the Green Belt Review Method Statement we have the following comments to raise:</p> <ol style="list-style-type: none"> 1. Whilst the study area is the administrative area of the District Figures 2 and 3 would benefit from identifying the how the Green Belt extends outside the District. Whilst this is shown in figure 1 its scale in the document is such that it is difficult to interpret how the Green Belt within Lichfield relates to the wider region. 2. The assessment of Broad Areas and Smaller Parcels represents a standard approach and is appropriate. However, based on the criteria for determining smaller parcels there appear to be some inconsistencies in BA7 and BA11. In BA7 there are apparent gaps in the smaller parcels to be assessed around Little Aston and Brownhills. Similarly, in BA11 at the area adjoining the urban area of Brownhills, south of the M6T should perhaps be considered as smaller parcels. 	<p>Comments noted. Figure 1 is extracted from the strategic growth study and illustrates the wider extent of the Green Belt within the housing market area. It is not considered necessary to show the AONB outside the district boundary as the study only relates to land within the district boundary.</p> <p>Comments of support on the assessment approach are noted. The methodology has been revised and the approach to parcel/area identification includes the identification of smaller parcels along the edge of settlements beyond the District's.</p>
Historic England	<p>Green Belt Review Methodology Paragraph 1.9 notes that one of the key reasons for the Green Belt Review is to look at areas of land to serve 'Lichfield City'. Given the nature of Lichfield as an historic city we are keen to ensure that any considerations to amend the Green Belt boundary take full accord of the Green Belt criterion relating to preserving the setting of historic towns.</p>	<p>Paragraph 1.9 relates to previous Green Belt review evidence which has been prepared by the Council and is discussed within the context setting section of the methodology. Appendix A clearly indicates that the setting of historic towns will be considered as part of the assessment.</p> <p>Comments noted.</p>

Stakeholder	Comments	Response to comments
	<p>We support paragraph 2.3 and the need to fully justify and evidence any changes to the Green Belt, through the Local Plan process. Other colleagues at Historic England are currently commenting on the Local Plan consultation and our comments should be considered together.</p> <p>If it is helpful to raise at this stage, Historic England have produced an advice note on site allocations in Local Plans and the historic environment, and this can be found by using the link overleaf: Site Allocations in Local Plans Advice Note - https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>We welcome the reference in paragraph 2.39 to the historic setting of Lichfield City and would encourage the Council to look at Historic England's Good Practice Advice Note 3, (link at the end of our comments), to ensure that the appropriate assessments are undertaken in order to comply with criterion 4 of the Green Belt policy.</p> <p>We note the broad areas of search discussed in paragraphs 2.47 and 2.48 and will make specific representation on any relevant land parcels through the Local Plan process.</p> <p>Paragraph 2.57 looks at providing an assessment in respect of broad areas of search and we raise the need to ensure that any assessment is detailed enough to draw appropriate conclusions. Some of the broad areas are extensive and could be difficult to draw appropriate conclusions for the historic environment.</p> <p>We support the references in paragraph 2.64.</p> <p>We seek clarification on the assessment process being the same for small parcels and broad areas, in respect of criterion 4. It may be difficult to assess the impact to the historic environment in respect of this clause, for broad areas, given the identified size of some of the areas.</p> <p>We have some concerns with the criteria listed to assess criterion 4 of Green Belt policy, on page 25 and highlighted below:</p> <ol style="list-style-type: none"> 1. Can features of the historic town be seen from within the parcel/area? 	<p>Comments noted.</p> <p>Comments noted. At this stage it is considered the methodological approach to the identification of the smaller parcels and broad areas to be assessed is appropriate and consistent with best practice. It may be appropriate at a later stage to undertake further detailed parcel assessments within the broad areas.</p> <p>Comments noted. The assessment process for small parcels and broad areas will be consistent. It is considered appropriate to identify broad areas given the scale of the green belt within the district.</p> <p>Comments noted. The method statement has been amended to include definitions of terms including 'features' in this context.</p>

Stakeholder	Comments	Response to comments
	<p>2. Is the parcel/area in the foreground of views towards the historic town from public places?</p> <p>3. Is there public access within the parcel/area?</p> <p>4. Does the parcel/area form part of an historic landscape that is related to an historic town?</p> <p>We seek clarification on what is meant by ‘features’. It is possible for the setting of heritage assets to be affected even where there is no visibility between the heritage asset and parcel of land/proposed development. In this case, even if features are not visible, there could still be impacts to the setting of historic towns. It is also possible that the parcels/ broad areas of land are visible from the historic town and relate to its setting, even if the town cannot be clearly seen from the parcels/ broad areas.</p> <p>Clause 2 and 3 are related to ‘public access’. The extent to which a parcel or broad area will contribute to the setting of a historic town will not necessarily relate to public access. There will be circumstances where land will preserve the setting of an historic town and no public access exists. Equally, the existence of public access may enhance the setting of heritage assets by opening up new views and vistas and therefore their loss could be significant. We recommend that this clause is further refined to ensure that where no public access exists, there is still full consideration of the impacts for the setting of the historic town.</p> <p>Clause 4 is welcomed, yet we would encourage the broadening of this clause to include whether there are any heritage assets, including undesignated heritage assets and their settings and how they make a contribution to the ‘setting and special character of historic towns’. This will need to be included for both small parcels and broad areas.</p> <p>We welcome the reference to Conservation Areas on page 26. If you require further information about the setting of heritage assets, please see Good Practice Advice Note 3: The Setting of Heritage Assets (2nd edition). Link set out below: http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p>	<p>Comments noted. Sub questions 2 and 3 are designed to assist in the parcel assessment with regards to the fourth purpose of the green belt (d). It is considered that the other sub-questions within the assessment form at Appendix A for this purpose of the Green Belt adequately cover the points raised.</p> <p>Comments noted. No changes to methodology made as a result of response.</p>

Stakeholder	Comments	Response to comments
Natural England	<p>We welcome the opportunity to comment on the Green Belt Review Method Statement. We have no specific comments to make on the Statement other than in appendix A, the example parcel/area assessment form, under the enhancing biodiversity section on page 26. Natural England and many partners in the Cannock Chase to Sutton Park area share an ambition to:</p> <ul style="list-style-type: none"> • Use a partnership approach to better manage, protect, expand and enhance lowland heathland and associated habitats to improve biodiversity. • Link and buffer these sites and also create a network of further complementary habitats. • Facilitate integrated sustainable public access and education to increase the value that people put on local biodiversity and the landscape. <p>To reflect this ambition we would welcome the addition of the wording in bold below: Enhancing biodiversity</p> <ol style="list-style-type: none"> 1. Are there any national or local designations within the parcel/area? 2. Is there any potential for creation or enhancement of appropriate habitat within the parcel/area? <p>We welcome a continuing dialogue with Lichfield Council on this matter so please do not hesitate to contact.</p>	<p>Comments noted.</p> <p>Proposed wording will be included within the parcel assessment form.</p>
Highways England	<p>The accompanying Green Belt Review methodology does not introduce any direct concerns with regards to the Strategic Road Network (SRN), but we note that it could potentially result in revisions to the sites and their boundaries.</p>	<p>The Green Belt Review will provide an assessment of parcels against green belt criteria. It will not itself propose alterations to the Green Belt, this can only be done in exceptional circumstances through the review of a local plan.</p> <p>No changes to methodology made as a result of response.</p>
Severn Trent Water	<p>We have no specific comments to make regarding your proposed Green Belt Review method statement however please keep us informed as your plans develop and when appropriate we will be able to offer a more detailed response.</p> <p>If you are able to send us GIS polygon data of the parcels then we can assess the individual sites with regards to future sewerage provision giving you an indication of how sustainable the land may</p>	<p>Comments noted.</p> <p>No changes to methodology made as a result of response.</p>

Stakeholder	Comments	Response to comments
	be to drain. You may wish to consider this type of evidence when determining the overall suitability of removing land from the green built for future development.	

2.0: Arup method statement review (May 2019)

Lichfield District Council
Green Belt Critical Friend Review
Review of Draft Method Statement

Final | 23 May 2019

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 250383-00

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1 Introduction

In March 2019, Ove Arup & Partners (“Arup”) was appointed by Lichfield District Council (“the Council”) to act as a critical friend on the Green Belt Review in order to assist the Council in the preparation of a sound and robust document.

The commission involves a number of different stages which will take place at various points during the preparation of the Green Belt Review. Stage 1 of the commission involves an independent review of the draft Green Belt Review Method Statement (March 2019) (“the Method Statement”) with recommendations provided as to how the methodology should be taken forward based on Arup’s existing experience of undertaking Green Belt Reviews and knowledge of current policy, good practice and case law. Given that there is no single ‘correct’ method for undertaking Green Belt Reviews our recommendations are purely based on our experience and knowledge and therefore the Council can choose to accept them or not. Consultation on the draft method statement has been undertaken by statutory consultees and the Duty to Cooperate partners and Arup will also consider the comments from these consultees (see Stage 5a of the Method Statement). This report sets out the Stage 1 independent review.

Stage 2 of the commission will take place following consultation of the method statement with wider stakeholders (see Stage 5b of the Method Statement). Arup will review the log of consultation responses and the final Method Statement.

Stage 3 of the commission will involve a critical friend review of the parcel assessments and evidence base document prior to publication.

The Council has undertaken a number of previous Green Belt Reviews which have been tested at Independent Examination: The Strategic Green Belt Review 2012 (“the 2012 Review”), the Green Belt Review Supplementary Report 2013 (“the 2013 Supplementary Report”), and the Local Plan Allocations Supplementary Green Belt Report 2016 (including Addendum (July 2017)) (“the 2016 Supplementary Report”). The latest Green Belt Review is intended to form part of the evidence base for the new Local Plan (the Local Plan Review) which is currently at the Preferred Options & Policy Directions stage. It is not intended to replicate the previous work but to build upon it. Since these Green Belt Reviews were undertaken the Greater Birmingham HMA Strategic Green Belt Review has been published (February 2018) as has the revised NPPF (February 2019).

In providing a critical friend review of the Method Statement, this report is structured by reference to the key elements of the Green Belt Method Statement. Commentary on the responses from statutory consultees and Duty to Cooperate partners is included within the sections where relevant:

- Section 2 reviews the context to the Green Belt Review including the historic context, national and local policy context, guidance, and good practice review;
- Section 3 reviews the overall scope and approach including the approach to boundary definition, the assessment categories, the means of determining

the overall assessment; the approach to washed over villages, and the approach to site visits;

- Section 4 reviews the Council's interpretation of the five purposes of Green Belt; and
- Section 5 provides a summary of the report including the recommendations and comments on the next steps.

2 Context to the Green Belt Review

2.1 Historical Context of the West Midlands Green Belt

The draft Method Statement at paragraph 2.19 notes that the 2012 Review provides a detailed background and history of the West Midlands Green Belt which remains pertinent to the study and will be set out in greater detail within the full Green Belt review document. Arup considers that it is important to incorporate the historic context and locally specific circumstances into the assessment method. This will assist the Council in building their exceptional circumstances case given that the locally specific context of the Green Belt is relevant to this.

The information set out in the 2012 Review at paragraph 3.1 makes clear that the Green Belt was originally devised principally as a mean of preventing the continuing outward expansion of the built up area of the West Midlands into the open countryside and towards the series of freestanding towns and villages surrounding the West Midlands urban area. Paragraph 3.4 notes how the detailed Green Belt boundaries were drawn allowing for future large-scale housing developments at certain strategic sites.

This clearly points towards Purpose 1 (checking the unrestricted sprawl of large built-up areas) and Purpose 2 (preventing neighbouring towns merging into one another) as being the original aim of the West Midlands Green Belt. The Council should consider whether this is still the case today and whether this still applies to the Green Belt in Lichfield. This should be acknowledged in the Method Statement.

2.2 Policy Context and Guidance

Arup considers the Green Belt evidence base context, and the national and local policy context to be thorough and comprehensive. It is recommended that references to the NPPF are updated to reflect the revised NPPF (February 2019) albeit it is recognised that the paragraph wording remains unchanged.

It is noted throughout the method statement that the Green Belt Review draws on good practice from other authorities within the housing market area who have recently completed Green Belt reviews (paragraph 2.6). Arup considers to be an important element in producing a robust method statement. This could be further reinforced by evidencing the good practice examples which have been considered and how these have shaped the method (this could be included within an Appendix to the Method Statement). If any of the good practice examples have been found 'sound' at Examination this will further strengthen the approach.

In Arup's experience, there is no single 'correct' method for undertaking Green Belt Reviews and therefore each methodology should be informed by local circumstances, national policy and guidance, and good practice. As the Inspector in the Cheshire East Examination emphasised in his Further Interim Views (December 2015), Green Belt Reviews should be consistent and transparent using available and proportionate evidence. He acknowledged the complexity of the process and the

involvement of professional judgement. Arup recommends the importance of reiterating this within the methodology.

3 Overall Scope and Approach

3.1 Scope and Approach

Arup agrees with the scope of assessing the entire Lichfield Green Belt (excluding Areas of Outstanding Natural Beauty (AONBs)) as part of the Review, as stated in paragraph 2.49 of the Method Statement.

The Council's proposed two stage approach of defining and assessing 'smaller parcels' and 'broad areas' aligns with the approach taken by neighbouring authorities. As set out in the previous section it would be helpful for the Council to explain why this approach has been adopted linking back to the evidenced good practice review. In addition, if any of the good practice examples have been found 'sound' at Examination, this will further increase the robustness of the approach. Arup has adopted a slightly different approach in previous Green Belt Reviews of defining and assessing 'General Areas' first, followed by smaller 'parcels' around all of the inset settlements, with the opportunity to define further parcels based on the findings of the General Area assessment.

3.2 Boundary Definition

3.2.1 Physical Features

Paragraph 2.53-54 of the Method Statement describes how 'smaller parcels' will be defined. This relates to the previous approach applied in the 2013 Supplementary Report and paragraph 139 of the NPPF. Arup recommends that further explanation is provided on what 'physical features' the Council are using to define boundaries. It is noted that the Cannock Chase Green Belt Review includes a list of relevant features. Arup has used the following table in previous reviews whereby durable features are used in the first instance with parcels drawn from the settlement outwards to the nearest durable feature.

Table 1: Boundary Definition

<p>Durable Features</p> <p>(Readily recognisable and likely to be permanent)</p>	<p>Infrastructure:</p> <ul style="list-style-type: none"> ● Motorway ● Roads (A roads, B roads and unclassified 'made' roads) ● Railway line (in use or safeguarded) ● Existing development with clear established boundaries (e.g. a hard or contiguous building line) <p>Natural:</p> <ul style="list-style-type: none"> ● Water bodies and water courses (reservoirs, lakes, meres, rivers, streams and canals) ● Protected woodland (TPO) or hedges or ancient woodland ● Prominent landform (e.g. ridgeline)
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	A combination of two or more of the features below would also be considered durable.
Features lacking durability (Soft boundaries which are recognisable but have lesser permanence)	<p>Infrastructure:</p> <ul style="list-style-type: none"> ● Private/unmade roads or tracks ● Existing development with irregular boundaries ● Disused railway line ● Footpath accompanied by other physical features (e.g. wall, fence, hedge) <p>Natural:</p> <ul style="list-style-type: none"> ● Watercourses (brook, drainage ditch, culverted watercourse) accompanied by other physical features ● Field boundary accompanied by other natural features (e.g. tree line, hedge line)

In addition, more clarity is required as to how the ‘broad areas’ will be defined. For example, Arup recommends that ‘broad areas’ are defined using the most recognisable boundaries with the most permanence in order to encompass larger areas. This could include motorways, ‘A’ roads, waterways and operational railway lines given these represent strong ‘permanent’ boundaries. If this approach results in a large number of ‘broad areas’ or areas which are disproportionately small, the Council could merge some of these areas providing a justification for this. It is noted that the Greater Birmingham HMA Strategic Green Belt Review applies a similar approach using motorways, ‘A’ roads and railways as boundaries (see paragraph 8.8).

3.2.2 Approach to Settlements in Neighbouring Authorities abutting the District Boundary

Paragraph 2.53 of the Method Statement describes how parcels will be defined adjacent to existing settlements and villages. Arup recommends that in the interests of Duty to Cooperate this approach is extended to settlements in neighbouring authorities which abut the Lichfield Green Belt. Where existing development in a neighbouring authority immediately abuts the Lichfield Green Belt, a parcel should be drawn to the nearest durable boundary. It is noted that the consultation response from Cannock Chase District Council makes a similar suggestion, it states: *“May be useful for the study to consider if any smaller parcels should be defined within the broad areas given the changed context and studies that have been completed since the previous study and those that are now underway. This could help ensure cross boundary consistency. For example, the Cannock Chase Green Belt Study identifies a number of smaller parcels along its boundaries with Lichfield District (partly due to the fact there have been cross boundary site proposals suggested in these areas).”*

3.3 Assessment Categories

The assessment categories to be applied have been retained from the 2013 Supplementary Report. Paragraph 2.38 of the Method Statement notes that these three categories relate to the parcel/area playing an ‘important’, ‘moderate’, or ‘minor’ role to the Green Belt purpose. Arup recommends that a ‘no’ category is introduced in order to allow for those instances where land does not fulfil a Green Belt purpose. For example, there will be instances where due to the location of the parcel, it does not perform a function in preventing neighbouring towns from merging. It should therefore be recognised that this has ‘no’ role to purpose 2.

Arup recommends that a definition for each of the assessment categories is provided in order to assist the assessor in understanding how they should be applied. For example, the definitions could be along the lines of:

- **Important role** – contributes to the purpose in a strong and undeniable way.
- **Moderate role** – contributes to the majority of the purpose but does not fulfil all elements.
- **Minor role** – contributes to a few elements of the purpose.
- **No role** - makes no contribution to the Green Belt purpose.

3.4 Overall Assessment

As per the 2013 Supplementary Report, the Method Statement proposes to apply the same approach to identifying the overall assessment. Paragraph 2.66 emphasises that all NPPF purposes carry equal weight and therefore “...*the overall assessment for each parcel/area will be determined by the highest category assessed for any of the four purposes. For example if three purposes score minor but one was assessed as important the overall assessment of the parcel would be important.*” Arup recommends that in order to create more differentiation between the parcels/areas and to enable a finer grain overall assessment, a number of rules should be identified to enable the overall assessment to be undertaken. Whilst these rules appear to be very extensive and detailed, they cover all possible scenarios and therefore will enable consistent application by the assessors. Arup has applied the following rules in other Green Belt Reviews:

- No parcel/area should be assessed as ‘no’ overall unless each of the five purposes is assessed as a ‘no’;
- Where there is a 4 / 1 split – the majority category should always be applied, unless the majority is ‘no’, in which case the overall should be ‘minor’.

Example:

Moderate	No	Moderate	Moderate	Moderate	Moderate
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Exception:

No	No	No	No	Moderate	Minor
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- Where there is a 3 / 2 split – the majority category should always be applied unless the ‘2’ categories are ‘important’. In this case, the overall should be ‘important’. The exception to this is where the majority is ‘no’. In this case the overall should be the minority category or the in-between category if relevant.

Example:

Minor	Minor	Moderate	Moderate	Moderate	Moderate
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Exception:

Important	Important	Moderate	Moderate	Moderate	Important
No	No	No	Minor	Minor	Minor
No	No	No	Moderate	Moderate	Minor

- Where there is a 3 / 1 / 1 split – the majority category should always be applied unless one of the minority categories is ‘important’ and one is ‘moderate’. In this case professional judgement should be applied. Where the majority is ‘no’, the middle category from the split should be the overall.

Example:

Important	Minor	Moderate	Moderate	Moderate	Moderate
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Exception:

Minor	Minor	Minor	Important	Moderate	Apply professional judgement
Minor	No	No	No	Moderate	Minor

- Where there is a 2 / 2 / 1 split – the category to be applied depends on what the split and the minority lean towards. For example, where the minority category is ‘no’, the lower category of the split should be applied. The exception to this is where the minority category is ‘important’, in which case professional judgement should be applied.

Example:

Minor	Minor	No	No	Moderate	Minor
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Minor	Minor	No	Moderate	Moderate	Minor
No	No	Minor	Moderate	Moderate	Minor

Exception:

Important	No	No	Moderate	Moderate	Apply professional judgement
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- Where 2 purposes are the same and the remaining 3 are all different, professional judgement should be applied.

Example:

Minor	Minor	No	Important	Moderate	Apply professional judgement
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- **Applying professional judgement** – it is recognised that the overall assessment is not intended to be a number balancing exercise and a certain level of professional judgement should be applied to all of the above rules and particularly where one of the purposes is assessed as ‘important.’ It is recommended that the overall aim and purpose of the Green Belt as set out in paragraph 133 is considered when making this professional judgement.

3.5 Washed Over Villages

Paragraph 2.55 of the Method Statement describes how the Council proposes to define ‘infill boundaries’ for a number of the ‘washed over’ villages within the Green Belt based on paragraph 139 of the NPPF. Policy NR2 of the Local Plan Strategy (2015) sets out the Council’s intention to define village infill boundaries. Arup recommends that the Council consider whether it is necessary to undertake a full Green Belt Village Study to assess whether the District’s villages should remain inset or washed over based on paragraph 140 of the NPPF. The definition of ‘village’ settlement boundaries would form part of this study. It is recommended that if undertaken, this forms a separate report to the Green Belt Review.

If the Council do not feel that a full Green Belt Village Study is necessary, it is recommended that further explanation is provided as to how these ‘village’ boundaries will be defined. In previous Green Belt Village Studies, Arup has used the limits of the built curtilage to define the village boundary. Properties which are physically separated from the main curtilage of the village or which are set back from the main building line are excluded on this basis. Local knowledge of the village from Council officers is also considered as part of this process.

3.6 Site Visits

Paragraph 2.75 of the Method Statement sets out the approach to site visits. Arup agrees this is sensible and proportionate. Further clarity could be provided as to what factors will be considered by the assessor on site, for example: existing uses, built form, existence of boundary features, openness, topography, views etc.

Arup ensures that prior to any parcel/area assessments being undertaken, all assessors are fully brief on the method in order to ensure a comprehensive understanding of the approach and consistency across the assessments. A sufficiently detailed methodology is important in this regard. These briefings are particularly important where multiple assessors are involved and reduces the risk of challenge to the output.

4 Interpretation of the Five Purposes of Green Belt

As set out above, Arup recommends that the historic context and locally specific circumstances are incorporated into the assessment methodology thus the interpretation of the five purposes should include their local interpretation. The following section provides some options which the Council could incorporate into the Method Statement to do this.

4.1 Local Roles

The Method Statement proposes to include two 'local roles' which were included within the 2013 Supplementary Review. The first local role of 'Maintaining the local settlement hierarchy and pattern' is included as part of Purpose 2 (to prevent neighbouring towns merging into one another) and there are three criteria relating to this role. These criteria appear to repeat the existing criteria for Purpose 2 and Arup considers that by implication this local role is already subsumed within the meaning of Purpose 2. In order to ensure that the local role is preserved, Arup recommends providing local interpretations of the meaning of Purpose 2, for example through the definition of 'neighbouring town'.

The second local role of 'preserving the character and setting of villages' is included as part of Purpose 4 (preserving the setting and special character of historic towns) and there are two criteria relating to this role. Paragraph 2.64 of the Method Statement notes that this local role is considered important due to the many of the villages and settlements being historic with significant conservation value and heritage assets. Again, the two criteria appear to repeat the existing criteria for Purpose 4 and Arup considers that by implication this local role will be covered by Purpose 4. Arup recommends that the Council ensures that the local interpretation of 'historic town' for the assessment of Purpose 4 includes the villages and settlements which the local role is intended to preserve.

If the Council are minded to retain separate criteria for both of the 'local roles', Arup recommends that guidance is provided as to how the additional criteria inform the overall categorisation of the purpose, for example, are they considered separately or alongside the rest of the criteria.

4.2 Parcel/Area Assessment Form

At present it is not clear what the assessor writes in the 'assessment' column of the form – do they provide answers to each of the questions or just write the category? Arup recommends that in order to ensure consistency across assessments and to ensure that the assessors fully understand the approach to take, model answers should be provided for each of the criteria in order to demonstrate what would constitute 'important', 'moderate', and 'minor'. Whilst it is recognised that the assessment will involve professional judgement, it is important that all assessors have a basic understanding of how to approach the assessment. It is notable that the Cannock Chase Green Belt Review provides answers and assigns a score to them for each of the assessment criteria.

Arup considers that the section on beneficial uses in the parcel/area assessment form provides useful additional information. Paragraph 2.67 of the Method Statement confirms that this section will not be categorised. Arup recommends that it is noted on the assessment form that this section is not categorised in order to make this clear.

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

Definitions

Given that the terminology of the purpose specifically refers to the ‘large built-up area’, Arup recommends that this is defined for the local context. It is noted that the 2013 Supplementary Report includes a definition table which defines the large built up area as Birmingham (including Sutton Coldfield) and Walsall (including Aldridge and Brownhills). The Greater Birmingham HMA Strategic Green Belt Review assesses all inset settlements as part of Purpose 1. Arup recommends taking a middle ground. Whilst it is clear that the original aim of the West Midlands Green Belt was to prevent the outward expansion of the West Midlands urban area, it should be recognised that within the District there is a need to prevent outward sprawl into the Green Belt. The Local Plan Strategy (2015) identifies the two main settlements as being Lichfield and Burntwood. It may therefore better reflect the terminology and intention of the purpose, whilst also linking back to the original aims of the West Midlands Green Belt, to define large built up area as including: Lichfield, Burntwood, and the West Midlands urban area (including Brownhills and Sutton Coldfield).

In Arup’s experience, there is often an overlap between purposes 1 and 3 thus even if not all the settlements are considered in purpose 1, they will not be overlooked as they will be covered by purpose 3.

It is recommended that the definition of sprawl as set out in the 2013 Supplementary Report is included.

The existing criteria refers to ‘openness’ (Question 7). Arup recommends that a definition of openness is provided based on most recent case law. The case of Turner [2016] EWCA Civ 466 confirms that both visual openness and spatial openness are relevant to the concept of openness. At paragraph 25, Sales LJ states: “*The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt...*” Spatial openness relates to the level of built form and the type of built form. Visual openness refers to the perception of openness which may be impacted by topography, views and vegetation.

Assessment Criteria

In Arup’s experience, the focus of this purpose tends to be on the level of connection of the parcel/area with the large built up area and also the existing boundary treatment of the parcel/area in order to understand its vulnerability to the risk of

sprawl. Arup recommends removing the current criteria which relates to coalescence and merging (Questions 2 and 4) given that these will be covered by Purpose 2.

A further factor which Arup suggests could be included in the assessment criteria is where the parcel/area is well connected to the built up area along a number of boundaries and development of the parcel/area could be considered to ‘round off’ the pattern of the built up area. This is often included within Purpose 1 given that such rounding off would mean that development was not ‘sprawl’. It is notable that the Greater Birmingham HMA Strategic Green Belt Review includes consideration of rounding off as part of Purpose 1.

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

Definitions

Following on from the recommendation above, the key factor in defining this purpose is in the definition of ‘neighbouring towns’. The 2013 Supplementary Report defines neighbouring towns within Lichfield District as: Lichfield and Burntwood, and within the adjacent Districts as: Tamworth, Cannock, Rugeley, Brownhills, and Sutton Coldfield. This definition links back to the settlement hierarchy set out in the Local Plan Strategy (2015) and is therefore logical. Arup considers that an alternative approach could be to expand the definition to include the ‘Key Rural Settlements’ identified in the settlement hierarchy as identified within the Local Plan Review Preferred Options & Policy Directions document: Fradley, Fazeley, Shenstone, Little Aston and Armitage with Handsacre. This could be justified on the basis of the two identified ‘local roles’ given that purpose 2 would then have a role both in ‘maintaining the local settlement hierarchy and pattern’ and ‘preserving the character and setting of villages’. This would then remove the need for the ‘local role’ criteria and remove the current Purpose 2 elements verging on Purpose 1. Furthermore, linking back to the original aim and purpose of the West Midlands Green Belt, there was clearly an intention to prevent the merging of the West Midlands urban area with the surrounding towns and villages.

It is notable that the Greater Birmingham HMA Strategic Green Belt Review, the Cannock Chase Council Green Belt Review and the Tamworth Council Green Belt Review do not differentiate between settlements as part of this purpose and consider all settlements in the assessment.

Arup recommends that the definition of ‘merging’ from the 2013 Supplementary Report is included.

Assessment Criteria

Arup would usually recommend that the sensitivity and integrity of the gap is considered rather than a numerical distance given that Planning Advisory Service (PAS) Green Belt guidance (February 2015) states that ‘a scale rule’ approach

should not be applied as the identity of a settlement is not always determined just by the distance to another settlement. It is however acknowledged that this approach has been adopted by Cannock Chase Council in their Green Belt Review. If the Council are minded to retain Question 2, Arup recommends that the Council explain and justify what represents an acceptable distance with reference to good practice elsewhere.

4.5 Purpose 3: To assist in safeguarding the countryside from encroachment

Definitions

As this purpose relates to the countryside, Arup recommends reiterating that it applies to all inset settlements. Arup recommends including the definitions of ‘countryside’ and ‘encroachment’ from the 2013 Supplementary Report.

Assessment Criteria

In Arup’s experience, the focus of this purpose tends to be on the relationship and connection of the parcel/area with the open countryside. Given this focus on the open countryside, the ‘degree of openness’ of the parcel/area is often a key factor to consider within the approach. A further key factor is the boundary features as this provides an understanding of the surrounding countryside’s vulnerability to encroachment. Arup recommends that both the boundary with the settlement (if the parcel is connected to the settlement) and the boundary with the countryside are considered. Existing encroachment is also a key consideration, and this has already been included as part of Question 3.

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

Definitions

A key factor in the assessment of Purpose 4 is the definition of ‘historic town’. It is noted that the 2013 Supplementary Report provides definitions for ‘setting’, ‘special character’ and ‘historic town’. The historic towns are defined as Lichfield and Tamworth however no justification is provided as to why these represent historic towns. Arup recommends that evidence from established historic sources such as relevant evidence base documents is used to determine what is defined as a ‘historic town’. If no such documents are available, Arup recommends using the list of ‘towns’ from Purpose 2 and reviewing this against the District’s Conservation Area Appraisals to determine whether the Conservation Area represents the historic core of that town. Arup has often undertaken this exercise alongside the authority’s Conservation Officer to ensure that their local and specialist knowledge is considered. It is also recommended that historic towns in any neighbouring authorities are included.

It is noted that the consultation response from Historic England seeks clarification on the definition of 'features' (Question 1 of the specific questions). This will be considered below given that it relates to the assessment criteria.

Assessment Criteria

It is considered that the assessment criteria set out in the Method Statement is along the right lines however Arup would echo Historic England's concerns on the lack of clarity and use of certain terminology. Should the existing terminology be retained Arup would recommend that definitions are provided (for example, what are 'features', what counts as 'views' and 'public access', and what is a 'historic landscape'). This would also be necessary to enable the assessor to properly carry out the assessment.

Arup's approach to previous assessments has been as follows:

Once the 'historic town' has been defined, the parcel/area only proceeds to the subsequent stages if it is adjacent to a historic town. If the parcel/area is not adjacent to a historic town then it is assessed as contributing 'no' role to Purpose 4.

For the next stage of the assessment Arup focuses on the relationship between the Historic Town's Conservation Area and the Green Belt. In order to do this, Arup applies a buffer from the Conservation Area outwards. Depending on the scale of the historic town the buffer of 250m has often been used. Parcels/areas outside of this 250m are assessed as contributing 'no' role to Purpose 4 unless they are relevant due to important recognised viewpoints noted in the Conservation Area Appraisal. The reason for focusing on Conservation Areas is to provide a high-level approach which ensures the focus is on the setting and character of these important historic assets which are given significant protection through legislation and policy. This stage does not go down to the level of individual listed buildings given that this would provide too much of a fine grain assessment which would not be proportionate and would not focus on the 'historic town' as a whole.

For the final stage of the assessment Arup focuses on the role of the Green Belt in preserving the setting and character of the Conservation Area by identifying whether this has been diluted through modern infill development or whether the parcel/area is well related to the Conservation Area. Conservation of other designated heritage assets such as listed buildings is considered at this stage as it is recognised that these may add to the setting and special character of the Conservation Area.

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

Assessment Criteria

The Method Statement notes that all parcels/areas will be scored as ‘moderate’ for Purpose 5 given that all parcels make an equally significant contribution to this purpose and ‘moderate’ is the middle scoring range.

In Arup’s experience, a number of authorities have chosen to follow the PAS Green Belt guidance from February 2015 which states that the value of various land parcels is unlikely to be distinguished by the application of this purpose and have therefore screened out Purpose 5 from the assessment. In light of the Cheshire East Inspectors’ Interim and Further Views, Arup has always advocated the inclusion of Purpose 5 within methodologies, taking a pragmatic approach to its assessment. It is therefore positive that the Council are intending to include Purpose 5 within the assessment. Arup recommends that further justification is provided as to why ‘moderate’ has been chosen given that the Council’s current approach to determining the overall assessment would mean that no parcels/areas could be assessed as being ‘minor’ overall.

Arup would consider the aim of Purpose 5 as being to understand the extent to which the Green Belt, in restricting the availability of greenfield sites, encourages the recycling of derelict and other urban land, taking into account local circumstances and regeneration priorities in certain locations which may outweigh this. In authorities which have a high level of previously developed land within the development limits, it is considered that the Green Belt plays a strong role in ensuring the recycling of derelict and other urban land, by restricting the availability of greenfield sites. The Greater Birmingham HMA Strategic Growth Study at Figure 16 demonstrates that there is significant urban supply (principally on brownfield land) which is concentrated predominantly in Birmingham as well as the Black Country authorities (Walsall, Wolverhampton, Dudley and Sandwell).

In order to ensure that the level of contribution for Purpose 5 is not arbitrary and has some basis, the assessment thresholds adopted in the Cheshire East Green Belt Assessment Update could be applied, if suitable. In order to do this the Council could calculate the percentage of brownfield urban potential within each authority in the housing market area. The proportion of developable and deliverable brownfield SHLAA sites (number of dwellings) relative to the existing number of dwellings within District would provide the percentage of brownfield urban potential. The thresholds applied in the Cheshire East Green Belt Assessment Update were as follows:

Brownfield Capacity Thresholds	Purpose 5 Level of Contribution
0%	No contribution
>0-1%	Contribution
>1-5%	Significant contribution
>5%	Major contribution

It is important to emphasise within the Method Statement that the assessment of purpose 5 is a theoretical exercise and it is acknowledged that it is an assessment of 'potential' and there is no guarantee that all parcels will have a blanket role in assisting urban regeneration across the authority.

5 Summary and Next Steps

This report provides an independent review of the draft Method Statement in order to assist the Council in preparing a robust and sound evidence base document.

Given that there is no single ‘correct’ method for undertaking Green Belt Reviews, Arup’s recommendations are purely based on our experience and knowledge and therefore the Council can choose whether to accept them or not.

This report is structured based on the various elements of a Green Belt Review. Reference to the consultation responses from statutory consultees and the Duty to Cooperate partners has been included where relevant.

In summary, Arup recommends the following:

Context to the Green Belt Review:

- Recognition of the original aim and purpose of the West Midlands Green Belt (see Section 2.1).
- Updating references to NPPF (February 2019) (see Section 2.2).
- Evidence the good practice review and explain how this has shaped the method (see Section 2.2).
- Acknowledging there is no single correct method for undertaking Green Belt Reviews (see Section 2.2).

Overall Scope and Approach:

- Providing further explanation on what features have been used to define boundaries, both for smaller parcels and broad areas (see Section 3.2.1).
- Defining parcels where a settlement in a neighbouring authority immediately abuts the Lichfield Green Belt (see Section 3.2.2).
- Introducing a 'no' role category and providing definitions for the categories (see Section 3.3).
- Identifying a number of rules to enable the overall assessment to be undertaken (see Section 3.4).
- Consider whether it is necessary to undertake a full Green Belt Village Study to assess whether the District's villages should remain washed over or inset (see Section 3.5).
- If a full Green Belt Village Study is not necessary, provide further explanation on the approach to defining ‘infill’ boundaries (see Section 3.5).
- Provide further clarity on what factors will be considered by the assessor on the site visits (see Section 3.6).

Interpretation of the Five Purposes of Green Belt:

- Remove the separate criteria relating to local roles and ensure Purpose 2 and Purpose 4 cover it, or alternatively provide further detail on how the

additional criteria will inform the overall categorisation of the purpose (see Section 4.1).

- Provide model answers to demonstrate what constitutes 'important', 'moderate' and 'minor' to enable consistent scoring (see Section 4.2).
- Make it clear on the assessment form that the beneficial use section will not be categorised (see Section 4.2).

Purpose 1

- Provide a definition of 'large built up area' and any other terminology used in the criteria (see Section 4.3).
- Review the assessment criteria to ensure it is relevant to Purpose 1, removing reference to coalescence or merging and considering whether other factors may be relevant (see Section 4.3).

Purpose 2

- Provide a definition of 'neighbouring towns' and any other terminology used in the criteria (see Section 4.4).
- Review the assessment criteria and ensure that acceptable 'distances' are explained and justified (see Section 4.4).

Purpose 3

- Provide a definition of any terminology used in the criteria and reiterate that it applies to all inset settlements (see Section 4.5).
- Review the assessment criteria to ensure it covers the purpose (see Section 4.5).

Purpose 4

- Provide a definition of 'historic town' based on evidence base documents, as well as any other terminology used in the criteria (see Section 4.6).
- Review the assessment criteria and ensure it is clear what the assessor should consider and why (see Section 4.6).

Purpose 5

- Provide a justification as to why 'moderate' has been chosen for the assessment of Purpose 5 (see Section 4.7).

Arup will discuss the above recommendations with the Council. Arup considers that most of the recommendations do not require significant changes and existing elements can be retained provided that their inclusion is justified with reference to an evidenced good practice review. Following consultation of the method statement with wider stakeholders Arup will undertake Stage 2 of the commission reviewing the log of consultation responses and the final Method Statement.

3.0: Method statement consultation (Stage 5b) – comments and response including Arup stage 2 report (September 2019)

Lichfield District Council
Green Belt Critical Friend Review
Review of Consultation Responses
on the Green Belt Method Statement

Final Issue | 13 September 2019

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 267466-00

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Appendices

Appendix A

Consultation Response Table and Arup Response

1 Introduction

In March 2019, Ove Arup & Partners (“Arup”) was appointed by Lichfield District Council (“the Council”) to act as a critical friend on the Green Belt Review in order to assist the Council in the preparation of a sound and robust document.

The commission involves a number of different stages which will take place at various points during the preparation of the Green Belt Review. Stage 1 involved an independent review of the draft Green Belt Review Method Statement (March 2019) and this stage was completed in May 2019. Following on from this, the Council consulted on the method statement with wider stakeholders (see Stage 5b of the Method Statement). The Council shared the amended Method Statement and the log of consultation responses with Arup and this report represents the Stage 2 critical friend review.

Stage 3 of the commission will involve a critical friend review of the parcel assessments and evidence base document prior to publication.

In providing a critical friend review of the consultation responses and amended Method Statement, a review has been undertaken of the Council’s responses to the consultation comments and a separate column has been included in the table setting out Arup’s response. This table is included at Appendix A. The issues emerging from the responses have then been considered in turn in this report and any final recommendations on the Method Statement have been made. This report is structured as follows:

- Section 2 considers comments relating to the purpose and scope of the Green Belt Review and more general points.
- Section 3 considers comments relating to parcel boundary and broad area definition;
- Section 4 considers comments relating to the assessment criteria for the five purposes;
- Section 5 considers comments on the approach to the overall assessment and application of professional judgement; and
- Section 6 provides a summary of the recommendations.

2 Purpose and Scope of the Green Belt Review

Issues emerging from the consultation comments were that:

- The purpose of the Green Belt Review is to identify land to be released.
- The role of the review is to ensure that objectively assessed needs for new residential and employment development can be satisfactorily accommodated.
- The Green Belt Review has not considered factors such as scope for mitigation, compensatory improvements, sustainable developments, and accommodating growth.
- It is unclear what has happened to the ‘local roles’ and how these are being assessed.
- The historical context of the Green Belt is not relevant.
- The Green Belt purposes should not be broken down into constituent elements.
- The degree of weight to be given to each of the five purposes is unclear and there are concerns about double-counting.

A number of the consultation comments state that the purpose of the Green Belt Review should be to identify land to be released or to ensure that objectively assessed needs can be met. Arup would reiterate that a Green Belt Review is not intended to determine land to be released. As set out in paragraphs 1.1-1.2 and 2.1-2.3 of the Method Statement, the Green Belt Review is intended to be an objective, evidence-based assessment of how the Green Belt contributes to the five purposes set out in national policy. Should the Council consider it necessary to release Green Belt land, the Review will inform decision making on this and an exceptional circumstances case would need to be made. The Review would be considered alongside other Local Plan evidence as part of a site selection process. This was recognised by the Inspector on the Cheshire East Local Plan Strategy. In his Further Interim Views (2015) on the Examination of the Cheshire East Local Plan Strategy he stated: “*The GBAU [Green Belt Assessment Update] only assesses Green Belt factors, without identifying potential areas for development, to provide a key input into the site-selection process...It provides a set of more comprehensive and proportionate evidence to inform, rather than determine, where the release of Green Belt land may be necessary at the site-selection stage.*” (paragraph 43 and 46).

Linked to the above, it is therefore not relevant for a Green Belt Review to consider factors such as compensatory improvements, sustainable development, scope for mitigation and accommodating growth.

A number of comments question what has happened to the previously stated ‘local roles’. In the Stage 1 Critical Friend Review report at Section 4.1, Arup previously advised the Council to subsume these within the assessment of the five purposes

given they appeared to be so closely related to purpose 2 and purpose 4. The Council has taken this advice however Arup recommends that this is made clearer within the Method Statement. Arup recommends that paragraph 2.73 includes a footnote next to the words 'local roles' to explain that these are not being assessed separately but have been subsumed within the five purposes as otherwise this paragraph may appear confusing. A number of comments question how the local roles have been subsumed and further explanation could be provided.

Some comments questions the relevance of including the historic context of the Green Belt within the Method Statement. Arup considers it important and good practice to review the historic context of the Green Belt in order to understand its original aim and purpose in the context of Lichfield. This also assists in defining the terminology for the assessment of the five purposes. This was noted at Section 2.1 and Section 4 of the Stage 1 Critical Friend Review report.

One comment questions why the five purposes have been broken down into constituent elements. In Arup's experience it is commonplace for each of the five purposes to be broken down using several criteria or questions and assessed to form an overall conclusion on that purpose. This enables a robust and consistent assessment of each purpose and represents good practice. The Greater Birmingham HMA Strategic Green Belt Review and the Cannock Chase Green Belt Review both use this approach.

One comment notes that it is unclear what degree of weight should be given to each of the five purposes as there could be double-counting due to overlaps. Arup considers that each of the five purposes should be given equal weight, as the Method Statement notes at paragraph 2.91. The questions in Appendix A of the Method Statement are intended to assist the assessor in coming to a conclusion on the level of contribution and Arup recommends that there should not be overlaps between the different purposes – this is considered further in Section 4.

3 Parcel Boundary and Broad Area Definition

Issues emerging from the consultation comments were that:

- It is unclear exactly how the broad areas have been defined.
- Site specific proposals put forward by landowners or developers don't reflect parcels and further site specific Green Belt assessments are required.
- Parcels should be defined with a view to establishing future defensible boundaries.
- Durable features have not been used to define parcels (for example parcel B8).
- Parcels have not been defined around the entire settlement in certain locations e.g. the land to the south of Lichfield has been excluded without explanation.

A number of the consultation comments request further clarity on the definition of broad areas. Arup agrees that further explanation is required as to how the broad areas have been defined as they do not include all road/railway/river boundaries as stated in paragraph 2.64 of the Method Statement. It appears that some roads have been used but not all. The broad area boundaries also do not solely include 'A' roads therefore it appears there has been selective use of certain features. Arup advocate the use of 'A/B' roads, rivers and operational railways in defining larger areas however this often results in a very large number of areas therefore Arup often undertakes an exercise to merge areas which have similar characteristics in order to reduce numbers down to a manageable amount in the interests of efficiency and proportionality. If the Council has undertaken such an exercise to reach the current broad areas, Arup recommends that this is explained and detailed in the Method Statement.

A number of consultation comments refer to specific submitted sites or comment that the parcel boundaries do not match submitted sites. As stated above, the Green Belt Review is not intended to determine land to be released and it is therefore important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the whole of the Green Belt to be assessed against the purposes and the Council can utilise the outcomes from the review for strategic decision making. Submitted sites often have different boundaries to parcels and therefore it is important that a separate assessment is made. If this is the approach that the Council intends to take, the Council could include some text in the Method Statement stating that site specific Green Belt assessments will be undertaken at a later stage if required.

Linked to the above, a number of comments state that parcels should be defined with a view to establishing future defensible boundaries. Arup's view is that the consideration of future defensible boundaries is only relevant to the site selection

stage (if required) and not the parcel/area assessment. This is due to parcels often having different boundaries to submitted sites combined with the purpose of the Green Belt Review in informing any future site selection process rather than determining areas for release.

A number of comments state that durable features have not been used to define parcels, in particular parcel B8 is identified as an example. Arup agrees that parcel B8 should be reviewed with Wharf Lane and Ogle Hey Road forming parcel boundaries. As a result, the area to the east of Ogle Hey Road would not be required to form a parcel as parcels would have already been drawn around the full extent of the settlement.

A number of comments note that parcels have not been defined around the entire settlement in certain locations, for example to the south of Lichfield. Arup recommends that this is reviewed as parcels should be defined around all inset settlements in accordance with the methodology. The only exception to this may be where there are national or international environmental designations. It is unclear why the Council has excluded parcels from the area to the south of Lichfield. Whilst development does not abut the settlement boundary, Arup recommends that parcels are still defined.

4 Assessment Criteria Relating to the Five Purposes

Issues emerging from the consultation comments were that:

Purpose 1

- Rugeley and Tamworth should be defined as large built up areas.
- All urban areas should be considered under purpose 1.
- The definition of sprawl should not include consideration of the large built up area becoming ‘physically joined’ as this relates to merging and is covered by purpose 2.
- Disagree that rounding off is a relevant consideration in the assessment of purpose 1.
- The word ‘unrestricted’ has been overlooked.

Purpose 2

- The identity of a town should not be determined by a distance e.g. 1km.
- The definition of towns includes settlements such as villages which are not technically towns.
- It should be made explicit as to which settlements are included e.g all those listed in the settlement hierarchy.

Purpose 4

- It is a highly unusual approach to include any settlements with historic features within the definition of historic town.
- The definition of historic town should not include villages.
- The proper status of Lichfield City's historic character should be fully recognised in assessing purpose 4.

Purpose 5

- Rather than scoring all parcels the same against this criterion it is considered that including this purpose in the assessment is of no benefit.

Purpose 1

Some comments suggest that Rugeley and Tamworth should be defined as large built up areas. Arup agrees that it should be noted that the large built up area also includes Rugeley and Tamworth. The Cannock Chase Green Belt Review includes Rugeley as a large built up area. Linked to this, one comments suggests that all urban areas should be considered as part of purpose 1. Arup’s view is that Purpose 1 specifically refers to ‘large built up areas’ and therefore this should be distinguished from purpose 2 for example, which specifically refers to ‘towns’. The

Local Plan Strategy (2015) identifies Lichfield and Burntwood as the two main settlements and therefore these have been included, alongside Birmingham and Walsall (with Rugeley now also included).

A number of comments state that the definition of sprawl should not include consideration of the large built up area becoming 'physically joined' as this relates to merging and is covered by purpose 2. At Section 4.3 of the Stage 1 Critical Friend Review report, Arup recommended that the criteria relating to coalescence and merging should be removed as they were covered by Purpose 2. Whilst the Council has removed the questions which mention 'coalescence', the definition of sprawl at paragraph 2.74 of the Method Statement still refers to the built-up area becoming 'physically joined'. In addition, the risk of 'coalescence' is still mentioned in the model answers for the 'moderate' and 'important' categories for purpose 1. Arup recommends that the questions, categories and definitions for purpose 1 are refocused to consider sprawl only with no reference to 'joining' or 'coalescence'.

A number of comments question the relevant of rounding off in the assessment of purpose 1. Arup suggested this should be included as part of the Stage 1 critical friend review of the Draft Method Statement. The consideration of rounding off forms one element of purpose 1 and given that the purpose focuses on 'sprawl', it is considered that if development gives the settlement a more 'rounded' pattern, it could not be defined as sprawl and would therefore not result in sprawl. As noted at Section 4.3 of the Stage 1 Critical Friend Review report, the Greater Birmingham HMA Strategic Green Belt Review also includes consideration of rounding off as part of Purpose 1.

One comments states that the word 'unrestricted' has been overlooked. Arup do not believe the word 'unrestricted' has been overlooked, Arup would argue that 'unrestricted' simply further enhances the meaning of 'sprawl' within purpose 1.

Purpose 2

A number of comments state that the identity of a town should not be determined by a distance e.g. 1km. At Section 4.4 of the Stage 1 Critical Friend Review, Arup recommended that if the Council were minded to retain the distance measurements for Purpose 2, they should explain and justify what represents an acceptable distance with reference to good practice elsewhere. Arup reiterates this point and recommends that the Council explain why the distances of 1km, 1-2km and over 2km have been used.

A number of comments state that the definition of 'towns' should not include all settlements such as villages which are not technically 'towns'. In Arup's view, whilst it is correct that all the settlements identified would not usually be defined as a 'town' under normal circumstances, the Council has chosen to use this approach in order to recognise the two 'local roles' which refer to maintaining the settlement hierarchy and preserving the character of villages. Arup recommends that the Council justify their approach within the Method Statement. The Arup Stage 1 Critical Friend Review comments on this at Section 4.4. In Arup's experience it is commonplace for Councils to include all settlements (including inset villages) in their assessment of purpose 2. The Greater Birmingham HMA Strategic Green Belt

Review, the Cannock Chase Green Belt Review and the Tamworth Green Belt Review all use this same approach.

One comment states that it should be made explicit as to which settlements are included e.g all those listed in the settlement hierarchy. Arup recommends that it should be made explicit that only 'inset settlements' will be considered, not washed over villages.

Purpose 4

A few comments state that it is a highly unusual approach to include any settlements with historic features within the definition of 'historic town'. Arup recommends that further information is provided at paragraph 2.81 justifying the inclusion of the list of historic towns. It is not clear on what basis local and national designations have justified them being considered a historic town. Any input from the Council's Conservation Officer or reference to Conservation Area Appraisals would be beneficial in this regard.

One comment states that the definition of historic town should not include villages. Arup would argue that the definition of neighbouring 'town' for purpose 2 includes all inset settlements (including villages) therefore this is a similar approach.

A few comments state that the proper status of Lichfield City's historic character should be fully recognised in assessing purpose 4. Arup would reiterate that the assessment of purpose 4 is intended to be a high-level assessment, it does not provide an in-depth site analysis of the historic environment which would form part of any site appraisal. There are examples of Green Belt Reviews which focus just on one major historic settlement compared to others which use a multi settlement approach. Whichever approach is used, it is important to be transparent and consistent, therefore there needs to be a clear evidenced explanation of the defined historic towns.

Purpose 5

A number of comments state that rather than scoring all parcels the same against this criterion it is considered that including this purpose in the assessment is of no benefit. In Arup's opinion, by assessing all parcels as 'moderate' for purpose 5, the Council is recognising that the Green Belt does have a role in assisting in urban regeneration. To assess purpose 5 as 'no contribution' as the consultation comments suggest, would not provide this recognition. The Council have already explained their justification for this at paragraph 2.84 of the Method Statement.

5 Overall Assessment

Issues emerging from the consultation comments were that:

- It is misleading to reduce a parcel with two or more 'Moderate' categories to an overall 'Minor' assessment. This should instead be maintained as 'Moderate'.
- It is not appropriate that where there is a 3 / 2 score split and the '2' categories are 'important' that the overall assessment should be 'important'. Different grades of importance should be provided otherwise a parcel with 2 'important' and 3 'minor' scores being graded the same as parcels with 5 'important' scores.
- The approach is overly complicated.
- The rules do not cover all eventualities. For example, the outcomes of the following are not provided:

Minor	Minor	Moderate	Important	Important	?
No	No	Minor	Moderate	Moderate	?

- Further clarification is sought on what will be taken into account when applying professional judgement.

Overall assessment – A parcel with two 'moderate' categories and the remaining three categories being 'minor' or 'no' would be minor overall. A parcel with more than two 'moderate' categories would be 'moderate' overall. If a parcel with two 'moderate' categories was assessed as 'moderate' overall, there would be very little differentiation between the overall assessments.

A number of consultation comments state that different grades of importance should be included to differentiate between parcels which have 2, 3, 4, 5 'important' scores. It is not possible for a parcel to have 5 'important' scores as purpose 5 has a blanket assessment of 'moderate'. Whilst it is correct that there is no differentiation between parcels with 4 'important' scores and 2 'important' scores, they are both still being given the highest score. In Arup's experience, very few parcels end up having 4 'important' scores, partly because purpose 1 only applies to the defined 'large built up area'. In Arup's view, adding further new categories to the overall assessment would confuse matters.

Some comments state that the approach to the overall assessments was overly complicated. Whilst Arup accepts that the approach might appear complicated, it ensures that the overall assessments are completed in a consistent manner.

A number of consultation comments stated that the rules did not cover all eventualities. Arup has identified there is one eventuality missing – in relation to a 2/2/1 split, one of the exceptions should be that if there are two 'important', the overall will always be 'important'. (This is also stated when there are two 'important and three of another category). Arup recommends this is added to the

Method Statement. The other examples identified by the consultation comment as shown above is already included in the Method Statement and this example would score 'minor'.

A number of consultation comments sought clarification on what would be taken into account when applying professional judgement. The last section in Paragraph 2.91 of the Method Statement on page 30 sets out the considerations in applying professional judgement linking back to paragraph 133 of the NPPF. The Council makes clear in their response that the judgement will be clearly explained in the assessment form.

6 Summary and Recommendations

This report represents the Stage 2 critical friend review and provides an independent review of the log of consultation responses and the amended Method Statement in order to assist the Council in preparing a robust and sound evidence base document.

Arup reiterates that there is no single ‘correct’ method for undertaking Green Belt Reviews and therefore Arup’s recommendations are purely based on our experience and knowledge of good practice and the Council can choose whether to accept them or not.

The report is based on the key themes emerging from the consultation responses and these are structured based on the various elements of a Green Belt Review.

In summary, Arup recommends the following:

Purpose and Scope of the Green Belt Review (Section 2):

- Arup recommends that it is made clearer what has happened to the previously stated ‘local roles’ within the Method Statement. Arup recommends that paragraph 2.73 includes a footnote next to the words ‘local roles’ to explain that these are not being assessed separately but have been subsumed within the five purposes as otherwise this paragraph may appear confusing. A number of comments question how the local roles have been subsumed and further explanation could be provided.
- Arup recommends that there should not be overlaps between the different purposes – this is considered further in the assessment criteria section.

Parcel Boundary and Broad Area Definition (Section 3):

- Arup recommends that further explanation is provided as to how the broad areas have been defined as they do not include all road/railway/river boundaries as stated in paragraph 2.64 of the Method Statement. It appears that some roads have been used but not all. If the Council has undertaken an exercise to merge certain areas based on similar characteristics, Arup recommends that this is explained and detailed in the Method Statement.
- If the Council intends to undertake further site specific Green Belt assessments at a later stage (if required), this could be stated in the Method Statement. This is not an absolute requirement if the Council is unsure at this stage however it would help to overcome some of the confusion between parcels and sites.
- The boundaries of parcel B8 should be reviewed. Wharf Lane and Ogley Hey Road form durable parcel boundaries.
- Parcels have not currently been defined around the entire settlement in certain locations (e.g. to the south of Lichfield) and Arup recommends that this is reviewed as parcels should be defined around all inset settlements in accordance with the methodology. The only exception to this may be where

there are national or international environmental designations. It is unclear why the Council has excluded parcels from the area to the south of Lichfield.

Assessment Criteria Relating to the Five Purposes (Section 4):

Purpose 1

- Arup agrees that Rugeley and Tamworth should be included as large built up areas.
- Arup recommends that the questions, categories and definitions for purpose 1 are refocused to consider sprawl only, with no reference to joining or coalescence. The definition of sprawl at paragraph 2.74 of the Method Statement should not include reference to becoming ‘physically joined’.

Purpose 2

- Arup recommends that the Council explain why the distances of 1km, 1-2km and over 2km have been used.
- Arup recommends that the Council justify their approach to defining all inset settlement as ‘neighbouring towns’ within the Method Statement. The Arup Stage 1 Critical Friend Review comments on this at Section 4.4.
- Arup recommends that it should be made explicit that only ‘inset settlements’ will be considered, not washed over villages.

Purpose 4

- Arup recommends that further information is provided at paragraph 2.81 justifying the inclusion of the list of historic towns. It is not clear on what basis local and national designations have justified them being considered a historic town. Any input from the Council’s Conservation Officer or reference to Conservation Area Appraisals would be beneficial in this regard.

Overall Assessment (Section 5):

- Arup has identified there is one eventuality missing in the overall assessment rules – in relation to a 2/2/1 split, one of the exceptions should be that if there are two ‘important’, the overall will always be ‘important’. Arup recommends this is added to the Method Statement.

Appendix A

Consultation Response Table and Arup Response

A1 Stage 5b Consultation – Wider Stakeholder Consultation Response Table

The following table sets out the responses received from those stakeholders who responded to the method statement public consultation which was undertaken between June and July 2019. The Council’s response column was completed by the Council prior to Arup receiving the document. Arup’s response is included the final column.

Stakeholder	Comments	Council’s response to comments	Arup response to Council comments
GB1: Mr P and Mrs G Hill	Please do not destroy this district by further encroaching on our green belt which was established to prevent the vandalism that we have just endured and are is currently going on without any thought on what it will do to this wonderful environment.	Comment noted. The consultation is on the Green Belt Review method statement. As set out within the method statement the Green belt Review will not itself propose alterations to Green Belt boundaries. The Local Plan will be supported by a range of evidence, of which the Green Belt Review will be only one element. No changes to methodology recommended as a result of response.	No further comment
GB2: Mr D King	I am a Burntwood resident and would not like to see any of our Greenbelt surrendered to developers. Since the last review, our infrastructure problems have not been addressed. In the past five years we have seen the building of close to 1,000 houses in our area. Our roads are getting more and more crowded. LDC review (focused Changes 2008-2029) review, Burntwood 9.6 ‘The Housing Supply Update produced in 2017 demonstrated that there was sufficient housing supply to meet the Districts overall housing requirement without the need to remove sites from the Greenbelt’.	Comment noted. The consultation is on the Green Belt Review method statement. As set out within the method statement the Green belt Review will not itself propose alterations to Green Belt boundaries. The Local Plan will be supported by a range of evidence, of which the Green Belt Review will be only one element.	No further comment

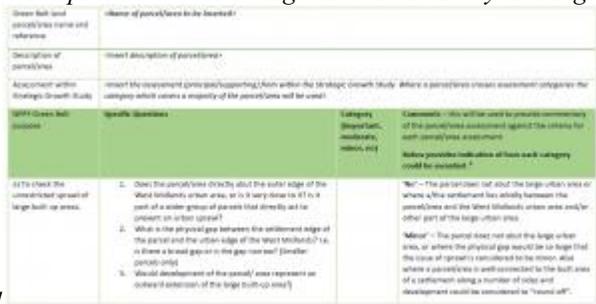
Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Lichfield District Council Local Plan Allocations DPD, Inspector's Report 25 April 2019 (report by Government Inspector Mike Fox (BA Hons) Dip TP MRTPI) Quotes</p> <p><i>36. Moreover, the emphasis on building new homes on previously developed land (PDL) in Burntwood, ensures the complete protection of the Green Belt around the settlement, resulting in positive sustainable outcomes. Taking all these considerations together, it is clear that the proposed distribution of new homes within the District accords with the principles set out in the LPS.</i></p> <p>We do not have easy access to railway travel, essential for a Birmingham commute.</p> <p>Our Greenbelt, (Highfields Road), is a beautiful green space, currently taken over to crop production which could be very important post Brexit. It is our natural divide between Hammerwich and the West Midlands conurbation. Burntwood has taken up every opportunity to use Brownfield sites, another 94 houses in progress, and has accommodated close to 400 'infill' properties in recent years.</p>	<p>The purpose of the Green Belt Review is to assess all parts of the Green Belt in terms of the nationally defined purposes of the Green Belt. Issues regarding infrastructure are not part of the purposes of the Green Belt.</p> <p>The Green Belt Review will form part of the evidence base associated within the Local Plan Review. This will ultimately replace the existing Local Plan. The inspectors report noted within the response relates to the Local Plan Allocations document, not the emerging Local Plan Review.</p> <p>The Green Belt Review will assess all areas of the Green Belt in terms of the nationally defined purposes of the Green Belt. As set out within the method statement the Green belt Review will not itself propose alterations to Green Belt boundaries. Comments noted. The purpose of the Green Belt Review is to assess all parts of the Green Belt in terms of the nationally defined purposes of the Green Belt. Issues regarding perceived levels of growth are not part of the study.</p>	

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
		No changes to methodology recommended as a result of response.	
GB3: Canal and River Trust	Thank you for consulting the Canal & River Trust in respect of the above consultation. I can confirm that the Trust has no comment to make in respect of the proposed methodology but would welcome being kept informed of progress in respect of this matter.	Comments noted. No changes to methodology recommended as a result of response.	No further comment
GB4: Burntwood Action Group	Paragraph references and quotations from the consultation document are italicised <i>1.14 The existing Green Belt evidence within the district is considered to provide robust and tested evidence for the purposes of the Local Plan Allocations which will form the second part of the Lichfield District Local Plan once adopted. It is not the purpose of this future Green Belt review to replicate that work, rather to build upon it and provide a comprehensive review for future 'plan-making' within Lichfield District.</i> Due to the 2013 Supplement and subsequent Green Belt Supplements not recognising Lichfield and Burntwood as large built up areas BAG has always maintained that they are seriously flawed documents. BAG asserts that these documents are deliberately prejudiced towards not recognising the importance of much of Burntwood's Green Belt in preventing urban sprawl. The decision to only consider the West Midlands Conurbation as a large built up area and the choice of specific assessment questions, resulted in the 2013 Supplement producing ridiculous, nonsensical assessments, such as the one below, of a parcel of land on the northern edge of Burntwood.	Comments noted. The existing Green Belt evidence supported the Local Plan Strategy and Allocations documents, both of which were subject to independent examination by the Planning Inspectorate as part of the Examination in Public of both documents. As the method statement makes clear the new Green Belt Review will represent a comprehensive review as part of the evidence base for the Local Plan Review.	No further comment

Stakeholder	Comments	Council's response to comments	Arup response to Council comments												
	<table border="1" data-bbox="416 341 987 568"> <thead> <tr> <th>Criterion</th> <th>Specific questions</th> <th>Assessment</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>Purposes of Green Belts</td> <td></td> <td></td> <td></td> </tr> <tr> <td>To check the unrestricted sprawl of large built-up areas</td> <td>Does the parcel directly abut the outer edge of the West Midlands urban area, or is it very close to it? Is it part of a wider group of parcels that directly act to prevent an urban sprawl? Does the Green Belt prevent another settlement being absorbed into the large built-up area?</td> <td>No: It is not part of a wider group of parcels directly preventing sprawl No</td> <td>Burntwood urban area lies between parcel and the west Midlands edge. Parcel would only directly act to prevent urban sprawl in event of Burntwood physically coalescing with the W. Mids.</td> </tr> </tbody> </table> <p>LDC claims that the 2013 Supplement to the Green Belt Review was examined as part of the examination of the Local Plan Strategy and the 2017 Supplement was examined as part of the examination of the Local Plan Allocations. However, both of these Supplements were published immediately prior to the public consultations on the Local Plan and were not subject to separate public consultation. BAG asserts that, if the Inspectors did in fact examine these documents, it must have been no more than a cursory glance. LDC's consultant Arup has obviously identified the lack of credibility in LDC's previous definition of Large built up areas and Lichfield City and Burntwood now head the list of 'Large built up areas' in this consultation document. This effectively nullifies the credibility of all previous Green Belt Reviews from 2013 and BAG insists that LDC must remove these documents from its Evidence Base and ensure that the new Green Belt Review is indeed <i>"robust, comprehensive and independent."</i></p> <p><i>2.6 This Green Belt review draws on the existing work carried out within Lichfield District and the GBSLEP. It draws on good practice from other authorities including those within the GBHMA who have recently completed Green Belt reviews for their administrative areas (Appendix C). The method seeks to provide a comprehensive and objective assessment of the Green Belt within Lichfield District.</i></p> <p>With the exception of the highlighted text, BAG welcomes this statement. The 2013 Supplement contained numerous subjective, prejudiced and sometimes inaccurate comments and BAG looks forward to more objective assessments, informed by site visits.</p>	Criterion	Specific questions	Assessment	Comments	Purposes of Green Belts				To check the unrestricted sprawl of large built-up areas	Does the parcel directly abut the outer edge of the West Midlands urban area, or is it very close to it? Is it part of a wider group of parcels that directly act to prevent an urban sprawl? Does the Green Belt prevent another settlement being absorbed into the large built-up area?	No: It is not part of a wider group of parcels directly preventing sprawl No	Burntwood urban area lies between parcel and the west Midlands edge. Parcel would only directly act to prevent urban sprawl in event of Burntwood physically coalescing with the W. Mids.	<p>Comments noted. The Green Belt Review will represent a comprehensive review as part of the evidence base for the Local Plan Review. The previous reviews form part of the evidence which underpins the existing Local Plan Strategy and Allocations documents.</p>	<p>No further comment</p>
Criterion	Specific questions	Assessment	Comments												
Purposes of Green Belts															
To check the unrestricted sprawl of large built-up areas	Does the parcel directly abut the outer edge of the West Midlands urban area, or is it very close to it? Is it part of a wider group of parcels that directly act to prevent an urban sprawl? Does the Green Belt prevent another settlement being absorbed into the large built-up area?	No: It is not part of a wider group of parcels directly preventing sprawl No	Burntwood urban area lies between parcel and the west Midlands edge. Parcel would only directly act to prevent urban sprawl in event of Burntwood physically coalescing with the W. Mids.												

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>2.27 However, at Burntwood the largest scale of housing development proposed through the 1998 Local Plan was the redevelopment of St. Matthew's Hospital, a former psychiatric hospital to the north-eastern edge of Burntwood which had become redundant at that time. Whilst the hospital site was proposed for housing development the area was not proposed to be removed from the Green Belt but rather was covered by a site specific policy for 'major developed sites' within the Green Belt.</p> <p>2.30 The Local Plan Strategy (LPS) was adopted in 2015 and included consideration of Green Belt boundaries within the District. the St Matthews area (see above) be removed from the Green Belt with the boundaries to be defined through the allocations document.</p> <p>2.31 The Local Plan Allocations document (ADPD) was prepared between 2016 and 2019 with the examination in public taking place in September 2018. The ADPD did not propose any changes to Green Belt boundaries with the exception of the removal of the St Matthews estate from the Green Belt. The detailed boundary for this change was drawn tightly around the existing built area of the estate. The ADPD is scheduled for adoption, subject to the decision of Council, in July 2019.</p> <p>The St Matthews Estate has existed for 20 years as a major development within the Green Belt and BAG plus many St Matthews residents have questioned the need to remove it from the Green Belt. The reason given in the Local Plan Strategy: "Integration of this area with the town would be beneficial in allowing the St. Matthews estate to function as part of the larger urban area." is a meaningless statement as residents of the estate have been treated no differently to other Burntwood residents. In fact, many moved from other parts of Burntwood to be further from the centre of the urban area. When questioned by BAG, LDC Officers gave the reason that it would make it easier for St Matthews residents to gain planning permission for changes to their properties. This was not true as many of those residents have extended their properties with no problems in gaining planning permission. It is patently obvious that the only purpose to be served by removing the estate from the Green Belt is to fracture the Green Belt boundary and make it easier for LDC Officers to justify</p>	<p>Comments noted. The Local Plan Strategy stated that the St Matthews area would be removed from the Green Belt with the precise boundaries to be defined by the Local Plan Allocations document. The Local Plan Allocations document defines this boundary, which is continuous with the built area of the estate. The new Green Belt Review is being progressed in support of the Local Plan Review document.</p> <p>Comments noted. Lichfield District Council considers its existing evidence to represent a robust assessment. The new Green Belt Review will be a comprehensive and robust evidence document in support of the Local Plan Review.</p>	<p>No further comment</p> <p>No further comment</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>the removal of adjoining land from the Green Belt. BAG urges LDC, through the Review of the Local Plan, to reconsider and reverse the decision to remove the St Matthews Estate from the Green Belt.</p> <p>Existing Green Belt Evidence</p> <p><i>2.40 As outlined earlier within this method statement a significant body of evidence has already been collected in relation to the Green Belt in support of the LPS and ADPD. This evidence has been tested at examination and is considered to represent good practice in undertaking Green Belt Reviews (Appendix C), specifically within the context of Lichfield District.</i></p> <p>Obviously LDC's consultant, Arup does not consider it good practice to avoid treating Lichfield and Burntwood as 'large built up areas.' BAG is very suspicious of LDC's assertion that "This evidence has been tested at examination."</p> <p><i>2.54 The existing evidence prepared to support the LPS and ADPD processes has been subject to independent examination and as such constitutes a robust assessment of the Green Belt within Lichfield both strategically and of the individual parcels identified within the supplementary report.</i></p> <p>The more times LDC repeats this point, the more suspicious BAG becomes.</p> <p><i>2.74 It is important to define the terms within each purpose of the Green Belt. Specifically, within the first purpose it is important to define what is meant by 'sprawl' and 'large-built up areas' for the purposes of the assessment. Arup recommended that specific definitions be included, those that will be used are as follows:</i></p>	<p>Comments noted. The definition of 'historic town' included within the method statement is considered appropriate as it is based on nationally recognised designations relating to the historic environment.</p>	<p>Definition of historic towns – Arup recommends that further information is provided at paragraph 2.81 justifying the inclusion of the list of historic towns. It is not clear on what basis local and national designations have justified them being</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>• <i>Sprawl: To spread out over a large area in an untidy or irregular way</i></p>  <p>(Oxford dictionary). Specific consideration is that the large built-up area could become physically joined to other areas by an outward spread, with no open separation between settlements.</p> <p>• <i>Large built-up areas: The settlements of Lichfield City, Burntwood and the cities, towns and settlements comprising the West Midlands conurbation around which the inner boundary of the Green Belt is drawn (these include Birmingham, Sutton Coldfield, Walsall, Aldridge, Brownhills). The inclusion of Lichfield and Burntwood within this definition recognises the need to consider the outward sprawl of the largest settlements within the District into the Green Belt, along with the need to prevent the sprawl of the conurbation.</i></p> <p>BAG welcomes the inclusion of Lichfield City and Burntwood in the list of 'Large built-up areas' but notes that the second sentence in the definition of sprawl is now redundant. The physical joining to other built up areas is covered by purpose b) To prevent neighbouring towns merging into one another. 2.80 & 2.81 the definition of 'historic town',</p> <p>Despite Burntwood and Hammerwich having documented histories back to the twelfth century and being recorded as hamlets in the 16th century (A History of the County of Stafford: Volume 14, Lichfield, ed. M W Greenslade (London, 1990)) LDC fails to recognise them as historic settlements. This, along with the previous definition of a 'large built up area' endorses BAG's opinion that LDC</p>	<p>The Green Belt Review will represent a robust and independent assessment as part of the evidence base supporting the Local Plan Review. Previous evidence has also utilised such an independent and robust approach. Where professional judgement is applied this is undertaken by suitably qualified professional officers.</p> <p>Comments noted. Site visits are part of the proposed methodology.</p> <p>The questions should refer to the 'large built-up area' as defined within the method statement. It is proposed to amend the specific questions under this purpose to make this clear.</p> <p>Comment noted. The specific questions are considered appropriate as they allow for a detailed</p>	<p>considered a historic town. Any input from the Council's Conservation Officer or reference to Conservation Area Appraisals would be beneficial in this regard.</p> <p>No further comments</p> <p>No further comments</p> <p>Purpose 1 - Arup agrees that the definition of sprawl at paragraph 2.74 should not include consideration of merging as this is covered in purpose 2. There appears to be double counting with purpose 2 due to consideration of</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>is attempting to understate the importance of Burntwood and Hammerwich and their Green Belt. Burntwood should definitely be included in the list of historic towns and Hammerwich should be listed as a historic village.</p> <p><i>2.91 OVERALL ASSESSMENT final paragraph</i> <i>Applying professional judgement: it is recognised that the overall assessment is not intended to be a number balancing exercise and a certain level of professional judgement should be applied to all of the above rules and particularly where one of the purposes is assessed as 'important.' It is recommended that the overall aim and purpose of the Green Belt as set out in paragraph 133 is considered when making this professional judgement.</i> BAG urges LDC to make sure that Arup oversees the application of 'professional judgement' to make sure that it is not prejudiced against certain parcels of land, as was the case with the 2013 Supplement.</p> <p>2.94 BAG welcomes the proposed involvement of Arup in reviewing the parcel assessments and final evidence base document prior to publication.</p> <p>2.99 – 2.101 Site visits BAG welcomes the importance which LDC now gives to site visits and Arup's involvement "to ensure that a consistent approach has been taken and that the document represents a robust and appropriate study which can be relied upon as part of the Council's evidence base."</p> <p>Appendix A: Example parcel/area assessment form Table 1: Parcel/area assessment form Despite the change in the definition of a large built-up area, the specific questions in the Assessment form (above) are identical to those in the 2013 Supplement, which only considered the West Midlands conurbation as a large built-up area. The only question which should be asked is Question 3: <i>Would development of the parcel/ area represent an outward extension of a* large built-up area? (*changed by BAG).</i></p>	<p>assessment of the purpose. This is based on good practice, following the good practice review and advice from Arup.</p>	<p>coalescence. Arup recommends that the questions and categories for purpose 1 are refocused to consider sprawl only, for example the moderate and important categories refer to 'coalescence' which will be considered as part of purpose 2.</p> <p>Rounding off - Arup do not dispute that a parcel of land which spreads from the outer edge of a settlement deep into the settlement could be vital in maintaining views of and access to the countryside, however the consideration of rounding off forms one element of purpose 1 and given that the purpose focuses on 'sprawl', it is considered that if development gives the settlement a more 'rounded' pattern, it could not be defined as sprawl and would therefore not result in sprawl.</p>

Stakeholder	Comments	Council’s response to comments	Arup response to Council comments		
	<p>BAG also questions the consideration given to rounding off. The fact that the release of a parcel of land from the Green Belt would result in a more rounded shape of a settlement should be irrelevant. The value of a particular parcel of land should be judged on its own merits, not on the shape of the settlement which would be created. A parcel of land which spreads from the outer edge of a settlement deep into the settlement could be vital in maintaining views of and access to the countryside. Openness is a very subjective concept.</p> <p>Extract from: Existing or potential contribution to positive functions of the Green Belt – retaining and enhancing the beneficial use.</p> <table border="1" data-bbox="405 619 1003 715"> <tr> <td data-bbox="405 619 577 715">Retain and Enhance landscapes and visual amenity</td> <td data-bbox="577 619 1003 715"> <ol style="list-style-type: none"> 1. Is the parcel/area part of or adjacent to the AONB? Does it contribute to the setting of the AONB? 2. Does it form part of the setting of a conservation Area? (When having regard to Conservation Area Appraisals) </td> </tr> </table> <p>Add a third question: Are there views of attractive open countryside across the parcel?</p> <p>Appendix C: Green Belt Review good practice review</p> <p>Again, LDC is claiming that “Documents represent the most recent evidence in relation to Green Belt within Lichfield District. All have been tested at examination in public for the Local Plan Strategy and Local Plan Allocations documents. These evidence documents provide an important baseline for the future Green Belt Review.”</p> <p>BAG repeats its assertion that not including Lichfield City and Burntwood as ‘large built-up areas’ in previous Green Belt reviews and Supplements invalidates those documents and they should be removed from the evidence base. They do not provide a satisfactory “baseline for the future Green Belt Review.”</p>	Retain and Enhance landscapes and visual amenity	<ol style="list-style-type: none"> 1. Is the parcel/area part of or adjacent to the AONB? Does it contribute to the setting of the AONB? 2. Does it form part of the setting of a conservation Area? (When having regard to Conservation Area Appraisals) 	<p>Comments noted. These element of the assessment relates to the positive functions as defined at paragraph 141 of the NPPF. The two criteria included are considered sufficient when considering the positive function. A third question as follows could be added, this removes the word ‘attractive’ which is considered too subjective: “Does it provide views into and from open countryside?”</p>	<p>No further comments</p>
Retain and Enhance landscapes and visual amenity	<ol style="list-style-type: none"> 1. Is the parcel/area part of or adjacent to the AONB? Does it contribute to the setting of the AONB? 2. Does it form part of the setting of a conservation Area? (When having regard to Conservation Area Appraisals) 				
<p>GB5: Burntwood Action Group (BAG) prepared</p>	<p>Please include the following in response to this consultation.</p> <p>Paragraph 1.1 I do not agree with the statement: “The existing Green Belt evidence within the district is considered to provide robust and tested evidence for the purposes of the Local Plan Allocations which will form the second part of the Lichfield District Local Plan once adopted. It is not the purpose of this future Green Belt review to replicate that work, rather to build upon it and</p>	<p>Comments noted. The existing Green Belt evidence supported the Local Plan Strategy and Allocations documents, both of which were subject to independent examination by the Planning Inspectorate as part</p>	<p>No further comments</p>		

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
<p>standardised response Submitted by (8 individuals); Mr Sean Godfrey; Ms Sarah Weiss; Mr Vic Chamberlain; Ms Pam Chamberlain; Ms Susan Fletcher; Mr Jack Gillespie; Mrs Lisa Gillespie; Mr Anthony Goodman</p>	<p>provide a comprehensive review for future 'plan-making' within Lichfield District."</p> <p>The 2013 Supplement and subsequent Green Belt Supplements did not recognise Lichfield and Burntwood as large built up areas. I believe that LDC deliberately chose to define the only large built up area as the West Midlands Conurbation to avoid assessing much of Burntwood's Green Belt as important in preventing urban sprawl.</p> <p>This led to comments, such as the one quoted below, from the assessment of a parcel of land on the northern edge of Burntwood.</p> <p>"Burntwood urban area lies between parcel and the West Midlands edge. Parcel would only directly act to prevent urban sprawl in event of Burntwood physically coalescing with the W. Mids."</p> <p>This is ridiculous nonsense.</p> <p>LDC claims that the 2013 Supplement to the Green Belt Review was examined as part of the examination of the Local Plan Strategy. It was, in fact, produced following Examination by the Government Inspector to find parts of the Green Belt which could be removed from the Green Belt to accommodate the extra housing that the Inspector required. There was no public consultation on that Supplement and I, along with other residents, had little opportunity to view it and no opportunity to respond to it. I am now informed that there was an opportunity to respond to it through the consultation on the Main Modifications to the Strategy but LDC did not publicise this fact.</p> <p>The 2017 Supplement was examined as part of the examination of the Local Plan Allocations. However, it was published immediately prior to the public consultations on the Local Plan Allocations and was, once again, not subject to separate public consultation.</p> <p>I am convinced that, if the Inspectors did in fact examine these documents, it must have been no more than a cursory glance.</p> <p>LDC's consultant Arup has obviously identified the lack of credibility in LDC's previous definition of Large built up areas and states: Appendix E para 4.3:</p>	<p>of the Examination in Public of both documents. As the method statement makes clear the new Green Belt Review will represent a comprehensive review as part of the evidence base for the Local Plan Review.</p> <p>Comments noted. The existing evidence clearly defines the terms within its methodology. This method statement sets out the methodology that will be used and definitions of terms which will be used. In some instances these definitions differ slightly from those used in the previous evidence. This is based on advice from Arup and the review of good practice. It should be noted that there is no nationally set approach for undertaking Green Belt Reviews, a fact referenced within the Arup method statement review. The District Council considers it appropriate at this stage of the new Green Belt Review to review the methodology and make changes as considered appropriate.</p> <p>Comments noted. The existing Green Belt Review evidence is no part of this consultation. The existing Green Belt evidence</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>“Whilst it is clear that the original aim of the West Midlands Green Belt was to prevent the outward expansion of the West Midlands urban area, it should be recognised that within the District there is a need to prevent outward sprawl into the Green Belt. The Local Plan Strategy (2015) identifies the two main settlements as being Lichfield and Burntwood. It may therefore better reflect the terminology and intention of the purpose, whilst also linking back to the original aims of the West Midlands Green Belt, to define large built up area as including: Lichfield, Burntwood, and the West Midlands urban area (including Brownhills and Sutton Coldfield).”</p> <p>Lichfield City and Burntwood now head the list of ‘Large built up areas’ in this consultation document. This effectively nullifies the credibility of all previous Green Belt Reviews from 2013 and I insist that LDC removes these documents from its Evidence Base and ensures that the new Green Belt Review is indeed “robust, comprehensive and independent.”</p> <p>The assertion by LDC that “This evidence has been tested at examination and is considered to represent good practice in undertaking Green Belt Reviews.....” is repeated in paragraphs 2.40, 2.54, is inherent in 2.6 and repeated again in Appendix C. In my experience, the need to continually repeat something usually indicates senility or deception.</p> <p>I welcome the statement in para. 2.6 “The method seeks to provide a comprehensive and objective assessment of the Green Belt within Lichfield District.” as the 2013 Supplement contained numerous subjective, prejudiced and sometimes inaccurate comments and I look forward to more objective assessments, informed by site visits.</p> <p>Paragraphs 2.27, 2.30 & 2.31 – Removal of the St. Matthews estate from the Green Belt</p> <p>The St Matthews Estate has existed for 20 years as a major development within the Green Belt and I question the need to remove it from the Green Belt. The reason given in the Local Plan Strategy: “Integration of this area with the town would be beneficial in allowing the St. Matthews estate to function as part of the larger urban area.” is a meaningless statement as residents of the estate have been treated no differently to other Burntwood residents. In fact, I know</p>	<p>supported the Local Plan Strategy and Allocations documents, both of which were subject to independent examination by the Planning Inspectorate as part of the Examination in Public of both documents. This included the first round of hearings in June and July 2013, the resumed hearings in October 2014 both for the Local Plan Strategy and the hearings for the Local Plan Allocations document which took place in September 2018.</p> <p>Specific consultation on evidence base documents is not required. All evidence is published by the District Council and is available alongside the Local Plan consultation documents.</p> <p>Arup’s review has informed revisions to this method statement. It is the intention of this review to provide a comprehensive and robust assessment for the purposes of supporting the Local Plan Review.</p>	<p>No further comments</p> <p>No further comment.</p>

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	<p>of many residents who have moved from other parts of Burntwood to be further from the centre of the urban area. The reason given by LDC Officers for removing the estate from the Green Belt is that it would make it easier for St Matthews's residents to gain planning permission for changes to their properties. This is not true as I know numerous residents who have extended their properties with no problems in gaining planning permission. It is patently obvious that the only purpose to be served by removing the estate from the Green Belt is to fracture the Green Belt boundary and make it easier for LDC Officers to justify the removal of adjoining land from the Green Belt. I urge LDC, through the Review of the Local Plan, to reconsider and reverse the decision to remove the St Matthews Estate from the Green Belt.</p> <p>Para. 2.74 Remove the second sentence of the definition of Sprawl to read: Sprawl: To spread out over a large area in an untidy or irregular way (Oxford dictionary). The physical joining of built up areas is covered by purpose b) To prevent neighbouring towns merging into one another. Large built-up areas: The inclusion of Lichfield City and Burntwood is welcomed.</p> <p>2.80 & 2.81 the definition of 'historic town', Burntwood and Hammerwich have documented histories dating back to the twelfth century and are recorded as hamlets in the 16th century (A History of the County of Stafford: Volume 14, Lichfield, ed. M W Greenslade (London, 1990))but LDC fails to recognise them as historic settlements. Burntwood should definitely be included in the list of historic towns and Hammerwich should be listed as a historic village.</p> <p>2.91: OVERALL ASSESSMENT final paragraph: Applying professional judgement and 2.94 Reviewing parcel assessments and final evidence base I am pleased to see the involvement of Consultant Arup in the above and trust that the prejudice against certain parcels of land, as witnessed in the 2013 Supplement is not repeated.</p>	<p>Comments noted. The definition of 'large built-up' area for the purposes of the new Green Belt Review is set out within the method statement. This will be used when undertaking assessments to be included within the Green Belt Review.</p> <p>Reference to the documents being examined represents a factual position.</p> <p>Comments noted. Lichfield District Council considers its existing evidence to represent a robust assessment. The new Green Belt Review will be a comprehensive and robust evidence document in support of the Local Plan Review.</p> <p>Comments noted. The Local Plan Strategy stated that the St Matthews area would be removed from the Green Belt with the precise boundaries to be defined by the Local Plan Allocations document. The Local Plan Allocations document defines this boundary, which is continuous with the built area of the estate. The new Green</p>	<p>Purpose 1 - See comments on Purpose 1 above.</p> <p>No further comment.</p> <p>No further comments</p> <p>No further comments</p>

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	<p>2.99 – 2.101 Site visits</p> <p>I welcome the importance which LDC now gives to site visits and Arup's involvement "to ensure that a consistent approach has been taken and that the document represents a robust and appropriate study which can be relied upon as part of the Council's evidence base."</p> <p>Appendix A: Example parcel/area assessment form</p> <p>Table 1: Parcel/area assessment form</p> <p>To check the unrestricted sprawl of large built up areas.</p> <p>Despite the change in the definition of a large built-up area, the specific questions in the Assessment form have not been changed from those in the 2013 Supplement, which only considered the West Midlands conurbation as a large built-up area.</p> <p>In assessing the importance of a parcel of land in checking the unrestricted sprawl of a large built up area the only question which should be asked is: Would development of the parcel/ area represent an outward extension of a large built-up area?</p> <p>Rounding off: The fact that the release of a parcel of land from the Green Belt would result in a more rounded shape of a settlement should be irrelevant. The value of a particular parcel of land should be judged on its own merits, not on the shape of the settlement which would be created. A parcel of land which spreads from the outer edge of a settlement deep into the settlement could be vital in maintaining views of and access to the countryside. Openness is a very subjective concept.</p> <p>Existing or potential contribution to positive functions of the Green Belt: Retain and enhance landscape and visual amenity</p> <p>Add a third question:</p> <p>3. Does it provide views of attractive, open countryside?</p> <p>The value of a parcel of land, in this respect, should not be limited by its position relative to an AONB or conservation area.</p>	<p>Belt Review is being progressed in support of the Local Plan Review document.</p> <p>Comments noted. The definition included within the method statement is considered appropriate and based on good practice.</p> <p>Comments noted. The definition of 'historic town' included within the method statement is considered appropriate as it is based on nationally recognised designations relating to the historic environment.</p> <p>The Green Belt Review will represent a robust and independent assessment as part of the evidence base supporting the Local Plan Review. Previous evidence has also utilised such an independent and robust approach.</p>	<p>No further comments</p> <p>Historic town – See comments on historic town above.</p> <p>No further comments</p>

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		<p>Comments noted. Site visits are part of the proposed methodology.</p> <p>The questions should refer to the 'large built-up area' as defined within the method statement. It is proposed to amend the specific questions under this purpose to make this clear.</p> <p>Comment noted. The specific questions are considered appropriate as they allow for a detailed assessment of the purpose. This is based on good practice, following the good practice review and advice from Arup.</p> <p>Comments noted. Such a specific question was recommended by Arup following their extensive experience of undertaking such evidence and is considered appropriate as one element of the assessment of this purpose.</p> <p>Comments noted. These element of the assessment relates to the positive functions as defined at paragraph 141 of the NPPF. The two criteria included are considered sufficient when considering the positive</p>	<p>No further comments</p> <p>Purpose 1 – See comments on purpose 1 above.</p> <p>Purpose 1 – See comments on purpose 1 above.</p> <p>Rounding off – See comments on rounding off above.</p>

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		function. A third question as follows could be added, this removes the word 'attractive' which is considered too subjective: "Does it provide views into and from open countryside?"	No further comments.
GB6: Lichfield Civic Society	<p>This response is made on behalf of the Society, who have over many years sought to support improvements to the environment, along with the conservation and protection of the special historic character of the City of Lichfield and the surrounding area.</p> <p>In relation to this Consultation document the Society is of the opinion that in general terms the methodology proposed for the Review is reasonably sound. However, the Society also considers there are certain detailed matters contained in the approach proposed within the document that require further evaluation and amendment.</p> <p>Society's principal concern relates to the approach proposed in testing Green Belt against Purpose 4 'to preserve the setting and special character of historic towns'. It is noted that Lichfield City is included within the document as an 'historic town', and this is obviously welcomed by the Society. However, the pre-eminence of the City in historic terms with its ancient Cathedral, Close, very many Listed Buildings, gridded street pattern and complementary open spaces and areas of water, all contained within a significant and sizeable Conservation Area, is seemingly down-graded, and treated as if it were a small village with a single historic feature in its centre. The City is unique in its historic character in Staffordshire, and even in the West Midlands it is in the top category of historic cathedral cities. The proper status of the City's historic</p>	<p>Comments noted.</p> <p>Comments noted. The approach to assessment of purpose 4 is considered to be appropriate. Parcel/broad area assessments will be undertaken individually and on a case by case basis which will allow for differences between all parcels to be recorded and assessed.</p>	<p>No further comments.</p> <p>Purpose 4 – Arup would reiterate that the assessment of purpose 4 is intended to be a high-level assessment, it does not provide an in-depth site analysis of the historic environment which would form part of any site appraisal.</p>

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	<p>character should be fully recognised in the test criteria rather than as is now being proposed.</p> <p>If the criteria were amended to incorporate the suggested approach, the Society believe this would show clearly during the evaluation stage justification for maintaining the Green Belt close to the built up part of the City. As well as retaining open views of the Cathedral, and other imposing and historic buildings, such as St Michael's Church and St Mary's, it would maintain the close inter-relationship between the historic core and important and complementary open spaces and water areas running between the built area of the town and the adjoining countryside.</p> <p>It is noted that somewhat similar views have been expressed on this Purpose and criteria by Historic England.</p> <p>Further, in relation to Purpose 4, it seems to the Society that a strong reason for maintaining a girdle of Green Belt around an historic town is to prevent the very character and setting of the settlement being "swamped" by over-development, leading to the loss of the historic character which it originally possessed.</p> <p>Although it may not be directly relevant at this stage in the process of preparing the emerging Local Plan, there appears to be a significant conflict between the present Local Plan strategy, which locates most new housing development in the two main settlements in the District, and the maintenance of Green Belt around those same locations in order to protect the unique characteristics of the two settlements. It is the opinion of the Society, and has been for a long period, that it is time to readdress this strategy and look for longer term solutions beyond the Green Belt areas of the District.</p> <p>Finally, the delineation of specific parcels of land for analysis in future stages of the Review does not appear to have been done with a view to establishing future defensible boundaries should elements of the total package of parcels be identified for removal from the Green Belt. Indeed, some of the boundaries appear arbitrary, leading to the potential creation of artificial, indefensible future Green Belt boundaries with all that implies about the potential for the future sprawl of the two main settlements.</p>	<p>Comments noted. Parcels/broad areas have been defined by the approach set out within the methodology. These defines parcels/broad areas using features as described. The Green Belt Review will assess areas of the Green Belt against the purposes of the Green Belt, it will not itself recommend changes to boundaries.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>Future defensible boundaries – paragraph 2.62-2.66 of the method statement clearly sets out the approach to boundary definition. If Green Belt release is required by the Council, Arup would recommend that submitted sites are assessed for their contribution to the Green Belt at a later stage. Arup would not recommend progressing parcels through to later stages of the Local Plan Review unless their boundaries match submitted site boundaries. Future</p>

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			defensible boundaries should therefore be considered at any future site selection stage (if required).
GB7 - Severn Trent	<p>Thank you for the opportunity to comment on your consultation. This document contains our response to this specific consultation as well as some general guidance and information.</p> <p>Green Belt Review Method Statement</p> <p>We are generally supportive of the methodology and appreciate its purpose with regards to bringing land forward sustainably for development in the future. We have no specific comments to make regarding the defined process and agree with the five purposes which will be used to steer the assessment. Our view point is that development in general is easier to accommodate when it comes forward in larger parcels such as urban extensions. This is because we can plan for a larger scale upgrade whereas dispersed development often means numerous smaller interventions and upgrades are required to the infrastructure which will serve the site(s), this can be more disruptive, costly and less efficient to implement.</p> <p>We would like to offer our resources for a high level wastewater infrastructure assessment on the smaller parcels of land. We feel this assessment although not a primary input for your methodology could support your decision on some of the more marginal sites. The assessment would provide a Red/Amber/Green rating for a site and indicate where we anticipate upgrades to the local sewerage system would be required alongside some supporting commentary. The assessment would also serve a second purpose of helping us understand potential shortfalls on our network in the future, which can be help improve our readiness should a site come forward in the future.</p> <p>To allow us to commence this assessment we would be grateful if you could provide the polygon boundaries for the smaller land parcel in a GIS format. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p>	<p>Comments noted. The Green Belt Review does not identify sites for development. The Parcels/broad areas identified are not areas for development, rather they are parcels of land for assessment through the Green Belt Review.</p> <p>No changes to methodology recommended as a result of response.</p> <p>As noted above the parcels/broad areas identified are not development sites, they are areas of land identified for the purposes of the Green Belt Review.</p>	<p>No further comments</p> <p>No further comments</p>

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GB8: Mr Jason Carwood	<p>Section 2.91: I believe it would be misleading to reduce a parcel with two or more 'Moderate' categories to an overall 'Minor' assessment. This should instead be maintained as 'Moderate' to reflect the level of sub-categories applying to each parcel.</p> <p>Appendix A Table 1: To show the transparency of decision making, examples of response to the specific questions should be given to highlight how assessments on Minor, Moderate or Important are arrived at.</p>	<p>Comments noted. The approach to scoring is considered to be appropriate and is based on examples of good practice, specifically the approach advocated by Arup.</p> <p>Appendix A details the criteria which will be used when determining which category has been assessed.</p>	<p>Overall assessment – A parcel with two 'moderate' categories and the remaining three categories being 'minor' or 'no' would be minor overall. A parcel with more than two 'moderate' categories would be 'moderate' overall. If a parcel with two 'moderate' categories was assessed as 'moderate' overall, there would be very little differentiation between the overall assessments.</p>
GB9: Savills on behalf of The Crown Estate	<p>We are writing on behalf of The Crown Estates ('TCE') to respond to the consultation on the Green Belt Review Method Statement. TCE has previously promoted 3 parcels of land through the Lichfield Local Plan Allocations document and has more recently submitted a wider land parcel to the west of Lichfield City through the Local Plan Review.</p> <p>Site Context As mentioned above, we have previously promoted three separate parcels of land for residential development to LDC through the Local Plan Allocations Document. The three sites were as follows and are shown in the attached Site Location Plan:</p> <ul style="list-style-type: none"> • Site 1 – Land off Abnalls Lane (0.8 hectares / 1.9 acres) (SHLAA reference 16); • Site 2 – Land off Walsall Road North (13.9 hectare / 34.2 acres) (SHLAA reference 20); 	<p>Comments noted.</p>	<p>No further comments</p>

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	<ul style="list-style-type: none"> Site 3 – Land off Limburg Avenue (1 hectare / 2.5 acres) (SHLAA reference 21). <p>As part of our representations to the Lichfield District Council ('LDC') Local Plan Review, we submitted a larger site area under TCE's ownership of approximately 63 hectares (138 acres) (Area 1 and Area 2 on the Site Location Plan). All of TCE's land is immediately adjacent to the settlement boundary and as Lichfield City is considered to be the most sustainable settlement in the District (as set out in table 4.1 of the LDC Local Plan Strategy), we consider that their land is a suitable location for future residential growth.</p> <p>Site 1 – Abnalls Lane</p> <p>In our previous representations, we raised concern with LDC's Green Belt Review (2016). Site 1, Land off Abnalls Lane, had not been assessed as part of the Green Belt Review and we were told by Planning Policy Officers at LDC that this was due to it being considered as being part of Beacon Park. The Park was not assessed in the Green Belt Review because it is a Registered Park and Garden so was not considered for development. Within the Green Belt Review Method Statement consultation document, Site 1 is now included within a proposed Green Belt parcel, Parcel 'L6' (Plan D.7 of Appendix D). We therefore assume that this parcel will be assessed as part of the Green Belt Review. We support the proposed assessment of this parcel and the inclusion of TCE's land within it. However, we consider that a blanket approach should not be taken to assessing this parcel. TCE's land is not part of Beacon Park so it should not be assessed as historic parkland just because it is adjacent to it. The site should be assessed on its sustainability merits as a separate entity to the historic parkland.</p> <p>In addition to the above, the site is partially previously developed land and immediately adjacent to the most sustainable settlement in the District which means the site is well served by public transport. Paragraph 138 of the National Planning Policy Framework ('NPPF') 2019 states that where it is determined that Green Belt land should be released, first consideration should be given to land which "has been previously-developed and/or is well-served by public</p>	<p>Comments noted. The site referenced within the representation is within one of the smaller parcels identified for assessment through the Green Belt Review. Parcels have been defined using the approach detailed within the method statement which is considered appropriate. This also ensures that a consistent approach to parcel/broad area identification is taken across the District. The approach suggested by the representation would be inconsistent.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>Parcels/Sites – It is important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the whole of the Green Belt to be assessed against the purposes and the Council can utilise the outcomes from the review for strategic decision making. Submitted sites often have different boundaries to parcels and therefore it is important that a separate assessment is made.</p>

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	<p>transport". Therefore, it is considered that releasing Site 1 from the Green Belt would accord with the aims of the NPPF. Additionally, the Western Bypass to the west of the site is also a suitable 'physical feature' that could be the redefined Green Belt boundary if Site 1 is released from the Green Belt and allocated for housing (paragraph 139 of the NPPF).</p> <p>Wider Land Ownership</p> <p>We support the inclusion of TCE's wider landownership as Parcels L4, L5, L7 and L8 (Plan D.7 of Appendix D) within the Green Belt Review. As the largest and most sustainable settlement in the District, we consider that future growth should be directed to the City. However, within the Local Plan Strategy and Local Plan Allocations documents, significant growth is already proposed to be delivered to the north, east and south of the City with limited developed development proposed to the west. There are limited environmental and heritage constraints within TCE's wider landownership which is why we consider that it would be a suitable location for the development of housing. Similarly to our comments for Site 1, when assessing Parcels L4, L5, L7 and L8, consideration should be given to the suitability of sites within the parcels for Green Belt release as well as assessing the parcel as a whole. A blanket approach should not necessarily be taken across all of the parcels. If a site within a parcel is considered suitable for development and by itself, scores low against the Green Belt purposes then it should be considered for release. When assessing Parcels L4, L5, L7 and L8 in the Green Belt Review, we agree that professional judgement (as set out in paragraph 2.91) should be applied when determining their overall assessment score to balance their sustainability merits against how they perform against the purposes of the Green Belt/</p>		
GB10: Sharon Beardsmore	<p>Since the last review, the infrastructure problems in Chasetown and Burntwood have not been addressed. Our roads are increasingly crowded and have been poorly maintained. We do not have easy access to rail travel, essential for the Birmingham commute nevertheless in the past five years we have seen the building of close to 1,000 houses in our area.</p> <p>The Greenbelt at Highfields Road is our natural divide between Hammerwich and the West Midlands conurbation and vital for maintaining local identity for</p>	<p>Comment noted. The consultation is on the Green Belt Review method statement. The Local Plan will be supported by a range of evidence, of which the Green Belt Review will be only one element.</p>	<p>No further comments</p>

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	the area and its appearance for residents quality of life. Mental health is much on the governments agenda it should be stated that green space and quality of home surroundings are essential components for good mental health. The green belt area provides this and also farm land for crop production.	No changes to methodology recommended as a result of response.	
GB11: Staffordshire County Council	Thank you for consulting Staffordshire County Council on the Green Belt Review Method Statement. We acknowledge that you have taken on board our comments from the earlier Stakeholder consultation and therefore have nothing further to add.	Comments noted. No changes to methodology recommended as a result of response.	No further comments
GB12: Councillor Steven Norman	<p>My main concern is with the definition of terms used and the "application of professional judgement".</p> <p>Whilst I understand the definitions for the methodology, the principles described from the NPPF and elsewhere there is still some reliance, perhaps inevitably, on the exact meanings of the words used.</p> <p>For example Table 1 in stage 3 describes "boundary definition" can be used by developers to argue for development up to "new" boundaries such as new roads. My experience is that it is very difficult, almost impossible in fact, to make a planning case against a planning application because of what it might result in – over and above the reason for the application itself. A clear case in point is the parcel of Green Belt land off Highfields Road, Hammerwich. The existing development provides a clear and established boundary (3rd bullet point) but so does the M6 Toll (1st bullet point). It is not surprising then that developers argue that this should be the boundary but it was no good objectors making that argument at the BNNR Public Inquiry.</p> <p>A similar situation exists in my ward of Chase Terrace and Sevens Road. I would argue that the 3rd bullet point is more important than the 1st – but what is the District Council's view?</p> <p>The other word I have some concern about is "rounding off" in the final paragraph of 4.3 on page 13 of the Draft Method Statement. I would argue that some "rounding off" can be a kind of controlled sprawl!</p> <p>I do understand the difficulties of coming up with exact definitions for all circumstances and as well as "professional judgement" there will also be the "inspectors Judgement" and ultimately the "Secretary of State's judgement".</p>	<p>Commented noted. Definitions for the terms to be used under each of the NPPF purposes are provided within the methodology and are considered to provide clarity as to how these will be used/defined.</p> <p>There is no nationally set approach to undertaking green belt reviews the methodology proposed is based upon good practice and professional understanding. With any planning assessment professional judgement of qualified persons will be required.</p> <p>No changes to methodology recommended as a result of response.</p>	Definitions – Definitions have been provided in the methodology to enable and consistent and robust assessment of the Green Belt. A review of good practice applied elsewhere has been undertaken to come up with these definitions.

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	<p>It was the Secretary of State's judgement that supported 750 dwellings to be built off Watery Lane, Lichfield describing it as a "sustainable" development which is this government's overriding planning argument.</p> <p>Yes, we need more houses but if words like "sustainable" are so loosely defined it is vital that the District Council does its best to protect the Green Belt around Burntwood and elsewhere with robust definitions that the public can trust.</p>		
GB13: Sport England	<p>Thank you for consulting Sport England on the Green Belt Review Method Statement. In reviewing the document Sport England raises no specific comments on the methodology. It is welcomed that additional information with regard to each/parcels opportunities for outdoor sport and recreation will be collected as part of the assessment.</p>	<p>Comments noted.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>No further comments</p>
GB14: Savills on behalf of Barratt West Midlands	<p>We are writing on behalf of Barratt West Midlands to respond to the consultation on the Green Belt Review Method Statement. Barratt West Midlands have been promoting land off Rugeley Road, Burntwood ('the Rugeley Road Site') for residential development through the Local Plan Allocations and the Local Plan Review documents (SHLAA 2018 Site 404). The Site is currently located within the Green Belt.</p> <p>The Rugeley Road Site is located immediately adjacent to the settlement of Burntwood which is recognised in the Local Plan Strategy and Local Plan Allocations document as the second most sustainable settlement in the District. The site is also immediately adjacent to Fulfen Primary School and a community facility (Burntwood Memorial Institute) as well as being approximately 480m from a local centre which offers a range of services and facilities and bus stops on Cannock Road and Lichfield Road which provide regular bus services to Lichfield and Cannock.</p> <p>Paragraph 138 of the National Planning Policy Framework ('NPPF') 2019 states that where it is concluded necessary to release Green Belt land, first consideration should be given to land that "has been previously developed and/or is well-served by public transport". We know from Lichfield District Council's (LDC) 'Urban Capacity Assessment' (2016) that there are limited brownfield sites available for redevelopment within Burntwood. The</p>	<p>Comments noted.</p> <p>Comments noted. The Green Belt Review proposes to assess parcels/areas of the Green Belt defined using the methodology set out within this statement. Technical details regarding site promotion are not considered as part of the methodology proposed for the Green Belt Review.</p>	<p>Parcels/Sites – It is important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the whole of the Green Belt to be assessed against the purposes and the Council can utilise the outcomes from the review for strategic decision making. Submitted sites often have</p>

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	<p>brownfield sites that are currently available, have already been allocated within the LDC Local Plan Allocations document. As the second most sustainable settlement in the District, the Local Plan Review should look to Burntwood to allocate further housing and with limited brownfield opportunities, Green Belt release will be required. We therefore support LDC's decision to a review of Green Belt within the District and LDC should seek to release sites in Burntwood that are well-served by public transport and close to services and facilities, like the Rugeley Road Site.</p> <p>As part of the promotion of the Rugeley Road Site, a series of technical work has been undertaken relating to heritage, highways / access, drainage and landscape. All of the technical work has been submitted to LDC as part of our representations to the Local Plan Allocations Publication and Focussed Changes consultations, Local Plan Review Issues and Options and Preferred Options consultations and the SHLAA 2018 consultation. The technical work identifies that there are suitable access options into the site, mitigation measures can be implemented to reduce the development's impact on the existing local transport network, the site can be suitability attenuated and will not increase runoff or floodrisk to other sites, there are no ecological issues that could affect the principle of development and the site can be design to limit its impact on the adjacent heritage asset (Grade II listed Fulfen Farmhouse) and the landscape. We therefore consider that the site is a suitable site for residential development as there are no significant environmental or heritage constraints within the site and the site is in a sustainable location adjacent to the second most sustainable settlement in the District.</p> <p>Paragraph 2.98 of the Green Belt Review Method Statement consultation document states that a desk top assessment will be undertaken as part of the 'Stage 6: Undertake Detailed Site Assessments' stage of the Green Belt Review. We request that the technical information previously submitted to LDC relating to the Rugeley Road Site is included in this assessment to ensure that LDC is using the most up to date evidence and site specific information for the Green Belt Review.</p>	<p>The Green Belt Review proposes to assess parcels/areas of the Green Belt defined using the methodology set out within this statement. Technical details regarding site promotion are not considered as part of the methodology proposed for the Green Belt Review. The assessment considers parcels against the purposes of the Green Belt as defined within the method statement.</p>	<p>different boundaries to parcels and therefore it is important that a separate assessment is made.</p> <p>No further comments</p>

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	<p>We support the identification of smaller assessment parcels around key settlements in the District. The Rugeley Road Site is located within proposed Green Belt Parcel 'B2' (Figure D2 of Appendix D). We note that Parcel 'B2' covers the same area as Green Belt Parcel 'E1' that was assessed within the 'Local Plan Allocation Supplementary Green Belt Report' (November 2016). It is considered important that a blanket assumption is not made to the proposed Green Belt parcels which assumes that the whole parcel will be brought forward for development. In Parcel B2, LDC's SHLAA 2018 identifies two sites that have been promoted within it; Site 404 (Rugeley Road Site) and Site 494. We understand that if the whole of the parcel is brought forward for residential development then it would result in the coalescence of Burntwood and St Matthews. However, the Rugeley Road site is adjacent to the sustainable settlement of Burntwood and its residential development alone will not result in the coalescence of the two settlements. Therefore, we consider that an approach should be taken which recognises potential sustainable sites within the identified parcels that could be suitable for development to assist LDC in meeting its housing requirement.</p> <p>Paragraph 139 of the NPPF 2019 sets out criteria that when defining Green Belt boundaries, plans should define boundaries clearly by using physical features that are readily recognisable and likely to be permanent. The Rugeley Road site is bordered by a hedgerow which we consider is a suitable physical boundary if the site is released from the Green Belt and any future development of the site could be designed to provide a landscaped buffer to ensure that there will be no future changes to the Green Belt boundary in this area.</p> <p>Paragraph 2.91 sets out the overall assessment categories. We do not consider it appropriate that where there is a 3 / 2 score split and the '2' categories are 'important' that the overall assessment should be 'important'. We consider that it would be more appropriate to provide different grades of importance or it could result in sites that have 2 'important' and 3 'minor' scores being graded the same as sites with 5 'important' scores. To overcome this we consider that sites which are have 5 'important' scores should be given an overall assessment of 'highly important', 4 or 3 'important' scores should be 'moderately</p>	<p>Comments noted. Parcels/broad areas assessed within the Green Belt Review are identified utilising the approach detailed within the methodology.</p> <p>Comments noted. The site referenced within the representation is within one of the smaller parcels identified for assessment through the Green Belt Review. Parcels have been defined using the approach detailed within the method statement which is considered appropriate. This also ensures that a consistent approach to parcel/broad area identification is taken across the District. The approach suggested by the representation would be inconsistent.</p> <p>Comments noted. The approach to scoring is considered to be appropriate and is based on examples of good practice, specifically the approach advocated by Arup.</p> <p>Comments noted. There is no nationally set approach to</p>	<p>No further comments</p> <p>No further comments</p> <p>Overall assessment – It is not possible for a parcel to have 5 'important' scores as purpose 5 has a blanket assessment of 'moderate'. Whilst it is correct that there is no differentiation between parcels with 4 'important' scores and 2</p>

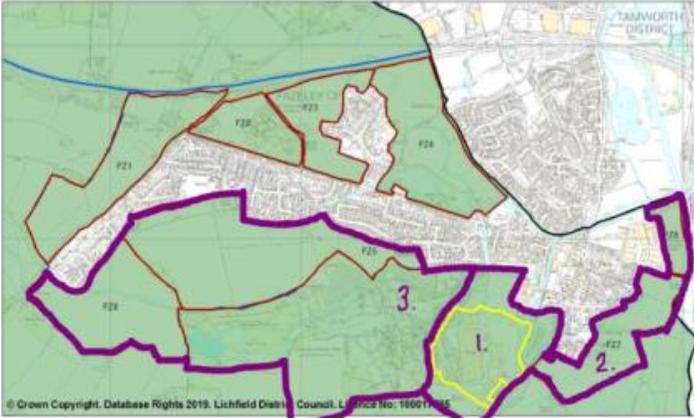
Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>important' and 2 'important' scores should be 'slightly important'. This will ensure more differentiation between 'important' parcels for all Green Belt purposes compared to where a parcel or site is only 'important' for 2 purposes. Paragraph 2.91 also states that on some assessments 'professional judgement' will be applied when determining the overall assessment. We acknowledge the Method Statement's reference that the assessments will not just be a 'number balancing exercise' but further clarification is sought on what will be taken into consideration when applying professional judgement on a parcel? We consider that the parcel's location should play an important role when applying professional judgement. Site's such as the Rugeley Road Site which is a site that is adjacent to the second most sustainable settlement in the District and in close proximity to public transport links, services and facilities should be rated more highly when applying professional judgement than a site in a less sustainable location in accordance with NPPF Paragraph 138/</p> <p>We trust you find the above helpful and we look forward to the final Green Belt Review being published. Please contact me if you have any queries with the above or when undertaking the Stage 6 assessments.</p>	<p>undertaking green belt reviews the methodology proposed is based upon good practice and professional understanding. With any planning assessment professional judgement of qualified persons will be required. This will be applied where necessary and relate to the purpose and role of the Green Belt Review.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>'important' scores, they are both still being given the highest score. In Arup's experience, very few parcels end up having 4 'important' scores, partly because purpose 1 only applies to the defined 'large built up area'. Adding further new categories to the overall assessment would confuse matters.</p> <p>Professional judgement – The last section in Paragraph 2.91 on page 30 sets out the considerations in applying professional judgement linking back to paragraph 133 of the NPPF. Considerations relating to sustainable development are not relevant for a Green Belt Review.</p>
<p>GB15: DPP Planning on behalf of FI Real Estate Management</p>	<p>These representations are submitted on behalf of FI Real Estate Management ("FIREM") of Canal Mill, Botany Brow, Chorley, Lancashire, PR6 9AF. FIREM is the current owner of Drayton Manor Business Park ("DMBP"). DMBP is major employment park located off the western side of A4091 south of Fazeley. DMBP extends to over 16.6 hectares (41 acres) and accommodates a range of industrial and office buildings which in total provides approximately</p>	<p>Comments noted.</p>	<p>No further comments</p>

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	<p>42,000 sq m (452,000 sq ft) of floorspace, supported by access and circulation roads, HGV manoeuvring areas, HGV and trailer parking and car parking and other areas of hardstanding.</p> <p>The reason for FIREM's representations is because DMBP is in Green Belt. Because of the site's designation as Green Belt FIREM has made representations in connection with the emerging Lichfield Local Plan to have the site removed from Green Belt, potentially along with other land north and south of it. This is because the inclusion of such a major developed site in Green Belt makes no planning sense nor reflects the reasons for including land in Green Belt.</p> <p>As such FIREM supports the Council's proposed review of Green Belt in Lichfield District. Its comments on this subject, made through these representations, are intended to assist the Council formulate an appropriate, and planning policy supported, approach for carrying out the review. They are also designed to encourage the Council to consider removing DMBP from Green Belt and reallocating the land for employment or similar.</p> <p>Our representations are provided in the form of general comments concerning the implications of Green Belt for a site like DMBP and specific comments on the Lichfield District Council: Green Belt Review Method Statement - June 2019 ("Method Statement") which we understand has been produced by the Council with input from Arup.</p> <p>General Comments</p> <p>It is clear from the above description of DMBP that it is a major developed site. Indeed, a previous version of the Lichfield Local Plan designated the site as a 'major developed site in Green Belt.' The scale of the development is also amply illustrated by the following plan, the base of which is drawn from the Method Statement, which shows the rough boundary of DMBP (in yellow). Indeed, even though the boundary includes some undeveloped/unused land, the plan very ably illustrates that DMBP is as large a developed area as many of the components of land to the north which form part of the developed area of Fazeley. These are excluded from Green Belt.</p>	<p>The Green Belt Review will provide a robust and comprehensive assessment of all parcels/areas of Green Belt within the District.</p> <p>Comments noted. The former major developed sites policy no longer forms part of the development plan within the District. The 2012 Strategic Green Belt Review concluded that such designations were not in conformity with the NPPF.</p>	<p>No further comments</p> <p>No further comments</p>

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	 <p>This begs the question why was DMBP ever included in Green Belt? Indeed, through no sensible or planning supported application of relevant planning policy applying when Green Belt was designated, and the boundary defined, is there any justification for including such a major developed site as this one in Green Belt.</p> <p>This was and remains the position now. We are surprised, despite specific and pertinent representations to date concerning the emerging new local plan that the Method Statement does not identify DMBP as a site that should be reviewed for deallocation from Green Belt by reference to relevant planning policy applying (in NPPF).</p> <p>FIREM has ambitious plans to improve and expand the existing employment park at DMBP and clearly Green Belt policy is, and will remain, a major inhibitor to any initiatives of this nature, which in our view significantly diminishes the role DMBP can, but should be able to play, as a valuable local employment resource and in the emerging local plan's employment strategy. Before commenting on a range of specific matters arising out of the Method Statement, we note that guidance on Green Belt, including concerning their designation and de-designation is set out in NPPF. At paragraph 133 of NPPF, it confirms that the Government attaches great importance to Green Belts. The</p>	<p>The method statement sets out the historic context of the Green Belt within the District.</p> <p>The Green Belt Review identifies parcels/areas using the methodology proposed. This does not necessarily correlate to specific site promotions.</p> <p>Comments noted. The Green Belt Review will provide a robust and comprehensive assessment of parcels/areas of Green Belt within the district. It will not in itself make changes to Green Belt boundaries.</p> <p>Comments noted. The Green Belt Review proposes to assess</p>	<p>No further comments</p> <p>No further comments</p> <p>No further comments</p>

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	<p>fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open. Applied to DMBP this does bring into question why DMBP is designated as Green Belt. The site is already heavily developed, as is much of the land around it, suggesting that 'sprawl' has already occurred. Indeed, if an essential characteristic of Green Belts is their openness, then again, the Green Belt south of Fazeley fails in this regard as a combination of DMBP, other development around it and Drayton Manor Theme Park contribute either nothing or very little to keeping the land open and free of development.</p> <p>At paragraph 134 NPPF confirms that Green Belt serves five purposes:</p> <ul style="list-style-type: none"> a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>In the context of applying this to DMBP and related land, criteria a), b) and c) cannot be satisfied, i.e., including DMBP in Green Belt is not contributing to the purposes of Green Belt; d) is not relevant and e) is also not satisfied. We say this since, perversely, DMBP is a brownfield site that needs recycling, i.e., fully or partially redeveloping to provide improved industrial floorspace and related facilities.</p> <p>We acknowledge that, as is confirmed at paragraph 135, the general extent of Green Belts across the country is established. Defining new Green Belts, and this applies to defining new boundaries for existing areas, should only be established in exceptional circumstances, for example, when planning for larger scale developments such as a new settlement or a major urban extension. Any proposals for new Green Belt boundaries to take account of this should be set out in strategic policies, which should:</p> <ul style="list-style-type: none"> a) demonstrate why normal planning and development management policies would not be adequate; 	<p>parcels/areas of the Green Belt defined using the methodology set out within this statement. Technical details regarding site promotion are not considered as part of the methodology proposed for the Green Belt Review.</p> <p>Comments noted. The Green Belt Review proposes to assess parcels/areas of the Green Belt defined using the methodology set out within this statement. Technical details regarding site promotion are not considered as part of the methodology proposed for the Green Belt Review.</p>	<p>No further comments</p> <p>No further comments</p>

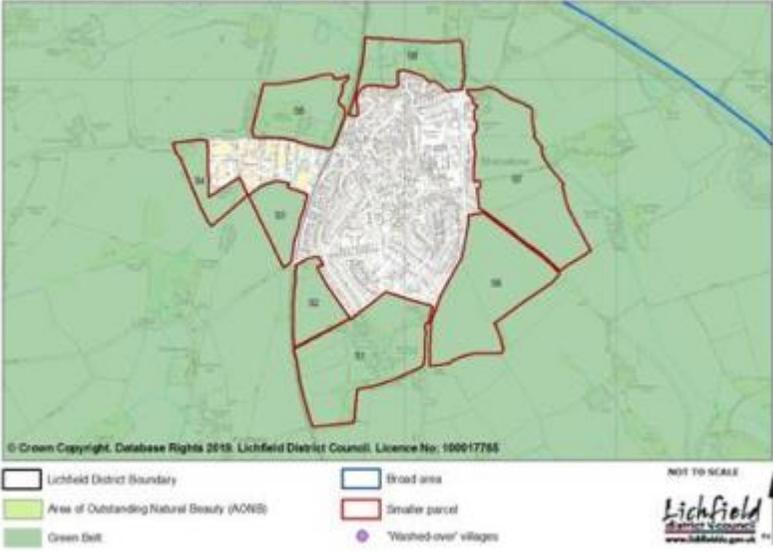
Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;</p> <p>c) show what the consequences of the proposal would be for sustainable development;</p> <p>d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and</p> <p>e) show how the Green Belt would meet the other objectives of the Framework.</p> <p>We have also in the past and through relevant representations suggested that DMBP, when considered with land immediately north and south of it, along with Drayton Manor Theme Park and land further west of this development, could form a successful mixed-use urban extension initiative. The extent of this, based on the above plan, could be as per the plan that follows (the main site is split into 3 as area 1. The area in question focuses on DMBP and land immediately north and south of it (Jelfs and Tolston land), and could form part of a smaller urban extension option taking into account either just area 2 or area 3):</p>		

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	 <p>It is our intention, as discussed at our meeting on 26th June 2019, to support our comments on this initiative through the equivalent of a selling document. Although this will be assessed through the examination of its strategic policies, which will take into account whether the strategy makes as much use as possible of suitable brownfield sites and underutilised land, an added benefit of the option present above is that much of DMBP and land around it is brownfield and underutilised land. Taking the land out of Green Belt and allocating it for development/redevelopment would optimise the density of development that could be achieved, thus also complying with other elements of NPPF.</p> <p>In addition, as is confirmed through paragraph 138 of NPPF, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.</p> <p>They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the</p>	<p>Comments noted. The Green Belt Review will provide a robust and comprehensive assessment of parcels/areas of the Green Belt. It will not itself make changes to the Green Belt boundary.</p> <p>Comments noted. The Green Belt Review will provide a robust and comprehensive assessment of parcels/areas of the Green Belt. It will not itself make changes to the Green Belt boundary.</p>	<p>No further comments</p> <p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>that the integrity of Green Belt, as a designation, and considering its stated purposes, is maintained.</p> <ol style="list-style-type: none"> 6. Ensure that the Council fully understands its future development needs, i.e., objectively assessed needs, and ensures that these, when converted into allocations, are located at appropriate locations where they are likely to be delivered within the plan period. 7. Appropriate weight to be given to the importance of maintaining an appropriate setting for Lichfield given its importance in heritage terms, which suggests that Green Belt around this settlement has a greater role to play than other areas of Green Belt, and places greater reliance on other settlements and related sites and Green Belt releases elsewhere to deliver the objectively assessed need for new development across the plan period. <p>The above should form the cornerstone of the Method Statement for the review of the Lichfield Green Belt.</p> <p>Specific Comments on the Method Statement Specific representations on the Method Statement follow the running order of text as set out in the Method Statement and are as follows:</p> <p>Introduction (page 3+) We note in the Introduction (paragraph 1.1) that the purpose of the Green Belt Review will be to undertake an independent and robust assessment of areas of land currently in Green Belt to determine the extent to which they meet the purposes of Green Belt as a designation as set out within paragraph 134 of NPPF.</p> <p>This is supported by FIREM since it suggests that if land currently in Green Belt does not meet the purposes of Green Belt as set out in NPPF then it should be promoted for removal from Green Belt.</p> <p>We note at paragraph 1.2 of the Method Statement that the purpose of the Green Belt Review is to provide an independent, comprehensive and transparent assessment of the Green Belt within the District for the purposes of</p>	<p>robust and objective assessment of parcels/areas against the purposes of the Green Belt. This represents once piece of evidence which will underpin the Local Plan Review. Green belt boundaries can only be changed through a Local Plan, if such a change is considered necessary it will be based upon a range of evidence, of which the Green Belt Review is one part.</p> <p>Comments noted. It is the purpose of the Green Belt Review to provide a robust and objective assessment of parcels/areas against the purposes of the Green Belt. This represents once piece of evidence which will underpin the Local Plan Review. Evidence will be prepared to understand the development needs of the area.</p> <p>Comments noted. The method statement currently includes a section setting out the history of the Green Belt within the District. This will be included in the final document.</p>	<p>No further comments</p> <p>No further comments</p> <p>No further comments</p>

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	<p>'plan making.' We also note that this exercise will supersede previous work done on the same subject in connection with previous development plans. FIREM also supports this. This is because it is important that current policy and development needs applying now, which will differ from those relating to previous initiatives of this nature, are given weight in the review.</p> <p>While we note that NPPF is clear at paragraph 136 that Green Belt boundaries should only be altered in exceptional circumstances, and through the preparation or review of a Local Plan, where these are fully evidenced and justified, we would say at the outset, as set out above, that a key and relevant benchmark in this instance is why was a major, heavily developed site like DMBP, which is larger in scale and footprint than many settlements which were excluded from Green Belt, included in Green Belt?</p> <p>In our view, and by reference to previous national planning policy and current NPPF guidance on the subject, its inclusion cannot be justified. The review needs to take this into account when prioritising land to be released from Green Belt. Only land that fully and properly serves a Green Belt purpose and satisfies Green Belt policy should be allowed to remain in Green Belt.</p> <p>At paragraph 1.4 of the Method Statement we note that reference is made to the Inspector's Report on the Examination of the Lichfield District Local Plan Allocations which was published in April 2019. The inspector concludes that, subject to several main modifications, the Local Plan Allocations was sound. However, main modifications one and two required the insertion of a new policy which committed the Council to Review its Local Plan and submit the review plan by 'no later than the end of December 2021.' This policy also confirms that the local plan review should consider a number of matters including 'a comprehensive Green Belt Review either in partnership with relevant neighbouring authorities or in close consultation with these authorities through the Duty to Cooperate, to inform any further Green Belt release to accommodate new development within the District.' This suggests to us that the Inspector had some concerns about the extent and detail of the boundary of Green Belt in the District. As the Council is aware FIREM made</p>	<p>The Green Belt Review does include a section which sets out the history of the Green Belt. It is not the purpose of the Green Belt Review to look back at the establishment of Green Belt boundaries historically.</p> <p>Comments noted. It is the purpose of the Green Belt Review to provide a robust and objective assessment of parcels/areas against the purposes of the Green Belt.</p>	<p>No further comments</p> <p>No further comments</p>

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	<p>representations and presented evidence to the Examination to the same effect which he took into account.</p> <p>Methodology (page 7+) This section confirms how the Green Belt Review will be used in plan making. <u>At paragraph 2.1 of the Method Statement</u> At paragraph 2.1 of the Method Statement it is confirmed that the Green Belt Review will assess distinct parcels of land to ascertain the extent to which they meet the purposes of the Green Belt as set out within the NPPF, which is an approach FIREM supports, as land should only be included and maintained in Green Belt if this can be fully justified by reference to NPPF guidance on the subject.</p> <p>Also, at paragraph 2.1 we note that, while NPPF is clear that Green Belt boundaries can only be changed through the development plan process, which we agree with, and that this should only occur in 'exceptional circumstances' where these are fully evidenced and justified, we question whether the comment that 'such decisions will be beyond the scope of this Green Belt review....' is appropriate? Surely the purpose of the Green Belt Review is to ascertain which parts of the District's Green Belt remain supportable and capable of being maintained in Green Belt by reference to NPPF. If land currently in Green Belt is found not to be supportable by reference to NPPF guidance on the same, then the land should be promoted for removal from Green Belt. To do otherwise raises the question as to whether the new plan would fully satisfy relevant tests, particularly soundness.</p> <p><u>Evidence Base</u> In addition, while we understand that the Green Belt Review will form part of the District Council's evidence base, and it will sit alongside other evidence-based documents which have been, and will continue to be produced in support of the work on the new plan, an important role of the review will be to ensure that objectively assessed needs for new residential and employment development can be satisfactorily accommodated through allocations for development, which might include some previously designated Green Belt</p>	<p>The method statement consultation has allowed views to be made by stakeholders to be made.</p> <p>Comments noted. This is not considered to be something which should be part of the Green Belt Review methodology.</p> <p>Comments noted.</p> <p>Comments noted. It is the purpose of the Green Belt Review to provide a robust and objective assessment of parcels/areas against the purposes of the Green Belt. The methodology defines what will be considered under each purpose.</p>	<p>No further comments</p> <p>Scope and purpose of the Review - A Green Belt Review is intended to be an objective, evidence-based assessments of how the Green Belt contributes to the five purposes set out in national policy. Should the Council consider it necessary to release Green Belt land, the Review will inform decision making on this and an exceptional circumstances case would need to be made. The Review would be considered alongside other Local Plan evidence as part of a site selection process.</p> <p>No further comments</p>

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	<p style="text-align: center;">D.10: Shenstone</p>  <p>This is of a similar scale to DMBP and extends out of the settlement yet was excluded from Green Belt. DMBP does likewise but was included. This piece of work will ensure that all relevant contexts are fully understood. This should also consider, possibly as a separate stage, a review of the impact of Green Belt policy on major brownfield/developed site resources like DMBP, by which I mean the negative impacts of the policy on improvement, new development, redevelopment and what can be regarded as legitimate expansion plans – by reference to the previously developed land credentials of this site. These factors are often overlooked when reviews of Green Belt are being contemplated or carried out and infrequently are given weight when the effects of Green Belt Policy are considered.</p>	<p>Reference to the documents being examined represents a factual position.</p> <p>Comments noted.</p>	<p>No further comments</p> <p>No further comments</p>

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	<p>It is important that this stage takes into account the views of and involves parties like DMBP, by which we mean it is important that the Council gets to hear first-hand of the negative effects of Green Belt policy on land and property investments, particularly a facility like DMBP, which we would argue is an important employment asset, and one that should be supported by reference to what will be the Council's employment land strategy for the District.</p> <p>Interviewing parties like DMPB should therefore form part of this stage of work. It might be appropriate for Arup's brief, as set out at paragraph 2.8, to be extended to ensure this work is done in conjunction with Council involvement.</p> <p>Regarding the individual stages of work set out in Section 2 of the Method Statement, in addition to the points made above, we comment as follows:</p> <p><u>On Stage 1: Context & Background to Review (covered at paragraph) 2.10</u></p> <p>We note that, additionally, Stage 1 will provide the background in terms of potentially meeting the unmet housing need arising from within the GBHMA, which we see as an important facet of this work. We also think it should apply to any related work which considers need for additional employment land and property.</p> <p><u>On NPPF, covered at paragraph 22</u></p> <p>We note the role of Green Belt, covered through 5 bullets, as set out at paragraph 134 of NPPF. Clearly, these bullets (a-e) cannot be changed in terms of their wording or scope, but we would encourage further consideration to be given to what they actually mean in a practical sense, including the benefits or disbenefits of including majorly developed sites like DMBP in Green Belt, which as far as FIREM is concerns serve no practical or beneficial role in so far as the key purposes of including land in Green Belt is concerns.</p> <p>In addition, and complementing this point, we would also suggest that further consideration be given to what bullet 5 (point e) actually means in a practical sense. This requires Green Belt to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land, which I define as brownfield/previously developed land. In the context of Lichfield and DMBP,</p>	<p>Comments noted. The methodology details the approach to parcel/area identification. This is considered to be a robust and proportionate approach. The Green Belt Review will be an independent and impartial assessment of the parcels/areas against the purposes of Green Belt defined within the NPPF.</p> <p>The site noted by the representation is not excluded from the Green Belt Review. If falls within one of the identified broad areas which will be assessed. The methodology sets out</p>	<p>No further comments</p> <p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>how can this be the case when a major developed site, brownfield in profile, is included in Green Belt? Accordingly, while NPPF policy clearly needs to be taken into account, its contexts and implications needs to be fully understood, and weight should be given to this point in the review.</p> <p><u>Paragraph 2.13</u> With regard to the fact that Green Belt is already established, covered at paragraph 2.13, while the NPPF makes clear that the general extent of the Green Belt is already established, and creating new Green Belt or taking land out of Green Belt should only be established in exceptional circumstances, and this should be done through strategic policies, this is in the gift of the emerging local plan, and is something FIREM would encourage. Linked to this, the additional criteria that are set out under the general comments section of our letter should be added to criteria to be taken into account.</p> <p><u>Paragraph 2.15</u> Here the Method Statement makes reference to paragraph 137 of NPPF, which requires authorities to demonstrate that they have examined fully all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances to justify changes to Green Belt boundaries exist. A key point in this regard is covered under paragraph 136 of NPPF, which inter alia, requires any development strategy of this type to make (point a) as much use possible of suitable brownfield sites and underutilised land.</p> <p>FIREM is of the view, as has been set out through representations made to earlier stages of the emerging local plan, to be supplemented in future through further work, that DMBP provides the opportunity, especially when considered with adjoining parcels and wider areas of land, to be considered as the heart of an urban extension initiative (to Fazeley). See plan included earlier.</p> <p>As such we would ask the Council, through the review, to give weight to existing brownfield sites and underutilised land, which DMBP and adjoining sites can certainly be described as, when considering ranking possible Green</p>	<p>the approach used to identify parcels/areas.</p> <p>The site noted by the representation is not excluded from the Green Belt Review. If falls within one of the identified broad areas which will be assessed. The methodology sets out the approach used to identify parcels/areas.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Belt releases. Obviously, lowest of the list in ranking terms, would be pure green field sites.</p> <p><u>Paragraph 2.17</u></p> <p>Linked to the above points, at paragraph 2.17 of the Method Statement it addresses paragraph 139 of NPPF which states that when defining Green Belt boundaries local planning authorities should: a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development; b) not include land which it is unnecessary to keep permanently open; c) where necessary, identify in their plans 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; d) make clear that the safeguarded land is not allocated for development at the present time. The sensible application of this would suggest that DMBP and adjoining sites need to be fully assessed as land that serves no sensible purposes as Green Belt and therefore should be removed from it, a point that should be made clear in the Method Statement as to how NPPF policy will be applied. This is also reflected in the additional criteria we invite be incorporated in the Method Statement.</p> <p><u>Paragraph 2.40</u></p> <p>Regarding existing Green Belt Evidence, the Method Statement comments that a significant body of evidence has already been collected in relation to the Green Belt in support of the LPS and ADPD. This evidence has been tested at examination and is considered to represent good practice in undertaking Green Belt Reviews (Appendix C), specifically within the context of Lichfield District.</p> <p>We would question whether this is in fact the case.</p> <p>One has to question whether what has gone before represents good practice when a site like DMBP remains in Green Belt, given the clear fact it does not contribute to the aims and objectives of Green Belt nor its stated purposes. We recommend a proper and thorough review of this.</p> <p><u>At paragraphs 2.46 and 2.47</u></p>		

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	<p>The Method Statement comments on identified specific parcels of Green Belt around the settlements of Lichfield City; Burntwood; Armitage with Handsacre; Fazeley, Mile Oak & Bonehill; Shenstone and Whittington. We understand that this relates to a previous review of Green Belt. But the point being made in the Method Statement relates to the relevance of these areas of Green Belt as playing what is termed 'local roles.' As the text in the Method Statement goes onto clarify, NPPF does not make special provision for this, and as such an approach is not valid. A point we agree with. Also, at paragraph 2.47 of the Method Statement, the methodology identifies an issue facing many Green belt Reviews, which is the fifth purpose of Green Belt which is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. While this also relates to a previous review and covers the point about trying to drive development into urban areas to safeguard undeveloped green field land, we would point out that the flip side of this is the negative effect of Green Belt designation on sites like DMBP which are already developed and brownfield in character. As we have already said, in these cases Green Belt plays no sensible purpose as the land is developed and therefore the site cannot contribute to keeping the land free of development. But importantly, the effect of Green Belt is to reduce the redevelopment/development potential of this brownfield Green Belt site, which seems to us to be at cross purposes of seeking to drive development into urban areas. We would ask that as part of the planned review, the Method Statement, seeks to identify land like DMBP which could and should be allowed to play a much greater role in development terms, thus placing less pressure on other land in urban areas and green field outside of them. This, as we have set out under general comments should be part of the criteria it sets out for the review.</p> <p><u>Paragraph 2.62</u></p> <p>At page 21, the Method Statement (at paragraph 2.62) deals with Stage 3: Identification of Land Parcels. It notes that, given the extent of the Green Belt within Lichfield District it was necessary to divide the land into parcels for assessment through this review. As such parcels are broadly divided into two</p>		

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	<p>categories: 'smaller parcels' and 'broad areas.' This approach is said to follow good practice of comprehensive Green Belt reviews which have been carried out within wider housing market areas.</p> <p>These omissions make no sense when the other smaller parcels and broad areas of land are to be assessed/considered, which are depicted through plans forming part of the Method Statement.</p> <p>This suggests to us that there has been some pre-judgement calls applied as to which areas of land might/should be considered for release from Green Belt, which suggests, rather disappointingly, that the exercise that will be carried out is as independent or impartial as has been suggested.</p> <p>Indeed, as has already been confirmed, FIREM, through DPP, has appraised the Council of its desire to see DMBP removed from Green Belt. It has made representations to this effect on several occasions. These have included the submission of a credentials document selling the potential of the site, plus land north and south of it, along with other land to be considered as part of an employment led urban extension which could be extended to include additional land with residential potential, as depicted through the plan included earlier under general comments.</p> <p><u>Paragraph 2.64</u></p> <p>Following on from the comments made above, at paragraph 2.64 the Method Statement reflects that many identified smaller parcels of land that are up for consideration, comprise large and small areas of land that are predominantly undeveloped tracts of countryside between settlements. We agree with the statement in this paragraph that these make a considerable contribution to the purposes of the Green Belt.</p> <p>This is not the case with DMBP and the land around it.</p> <p>Indeed, even by reference to subsequent points made in the Method Statement about using recognisable durable features such as roads, operational railways and water bodies to identify land for review, we would question why DMBP is excluded, this because DMBP is served by an A Class road and is close to services and other facilities. There are many hard features around the land that</p>		

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	<p>can be used to define a new Green Belt boundary, points that seem to have been ignored in the context of this site.</p> <p><u>Paragraph 2.72</u></p> <p>With regard to Stage 4: Designing the Assessment Approach, set out at paragraph 2.72, the Method Statement also seems to ignore the contexts applying to sites like DMBP, and as such we question whether it can be regarded as an appropriate approach.</p> <p>If, as is set out at paragraph 2.73, the approach is designed to provide a simple, objective and consistent assessment of all parcels/areas, we would again question why some parcels of land are included for assessment when others like DMBP are not. This is particularly relevant when one considers that the review has to consider the purposes of including land in Green Belt as defined in the NPPF, which in our view have to be given greater weight than any local role established through the Supplementary Review 2013.</p> <p>As such, the NPPF purposes of including land in Green Belt, as set out through the following criteria, should be applied properly and reasonably, in the context of whether land in Green Belt fulfils these purposes:</p> <ul style="list-style-type: none"> a) whether the land contributes to checking the unrestricted sprawl of large built-up areas; b) does it prevent neighbouring towns merging into one another; c) does it assist in safeguarding the countryside from encroachment; d) does it preserve the setting and special character of historic towns; and e) whether the land assists in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>Obviously land currently in Green Belt that does not satisfy any of these criteria should be deallocated and either relocated for development or retained as white lane.</p> <p>We would be grateful if our comments are taken into account when the method statement is being finalised.</p>		

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<p>GB16: Mark Liell Property Consultants on behalf of John Kingslake (Farms) Ltd</p>	<p>RE: Bangley Farm Land at Sutton Road/Hints Road, Mile Oak Section: Stage 3: Identifications of Land Parcels, Ref: D.4: Fazeley, Mile Oak and Bonehill (page 50) Land Parcel – FZ1 (part of)</p> <p>Comments: We are supportive of the recent Local Plan modification incorporating a requirement that as part of the current Local Plan review process, the Council should consider “a comprehensive Green Belt Review” and are supportive that the Council are undertaking such an exercise.</p> <p>We believe that selective Green Belt releases are essential in order to meet the Council’s likely housing need requirements for delivery in the period to 2036 and that releases in the Fazeley, Mile Oak and Bonehill area, where excellent schooling, nearby employment, good road and public transport connectivity already exist (with capacity), should be given high priority consideration.</p> <p>We observe that the selection of sites, to be considered, has been limited to either ‘broad areas’ or ‘smaller parcels’. It is noted that only part (16.6 acres) of our clients whole landholding (known as Bangley Farm land) which has previously been promoted, has been selected for review under the ‘smaller parcels’ definition. We contend that the whole area (circa 100 acres), which has been highlighted for possible residential lead development throughout the current Local Plan review process and is the subject of a number of representations, should be considered. It is logical to include an area which has been promoted previously and furthermore the parcel has a ‘durable’ western side boundary, in the form of Bangley Farm ‘haulier’s yard’ (a large non-conforming use on a brownfield site in the Green Belt) and adjacent landscape belt.</p> <p>We propose that Plan D4 should be changed and the area referred to as FZ1, extended to include the fields extending west up to the fixed Bangley Farm road hauliers yard and green wedge/bund boundary.</p>	<p>Comments noted.</p> <p>Comments noted. The methodology details the approach to parcel/area identification. This is considered to be a robust and proportionate approach. The Green Belt Review will be an independent and impartial assessment of the parcels/areas against the purposes of Green Belt defined within the NPPF.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>No further comments</p> <p>Parcels/Sites – It is important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the whole of the Green Belt to be assessed against the purposes and the Council can utilise the outcomes from the review for strategic decision making. Submitted sites often have different boundaries to parcels and therefore it is</p>

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			important that a separate assessment is made.
GB17: Pegasus Group on behalf of Drayton Manor Theme Park	<p>Pegasus Group is instructed by Drayton Manor Park Limited to make representations to the Lichfield District Council Method Statement for the Green Belt Review 2019 that is being consulted on.</p> <p>Drayton Manor Park (DMP) welcomes the opportunity to make observations and comment in respect of the 'Green Belt Review Method Statement' and are supportive of the proactive approach being taken by Lichfield District Council (LDC) in consulting on the methodology at this early stage.</p> <p>This Green Belt Review Method Statement sets out the approach proposed by LDC for undertaking the required Green Belt Review, including the detailed methodology and the parcels of land which have been identified to be assessed. The Method Statement has also sought to set out the context within which the review is being undertaken and highlight the work which has already been completed. It seeks to provide a comprehensive and objective assessment of the Green Belt within Lichfield District. The final Green Belt Review will form evidence for the Local Plan Review, and for neighbourhood plans where relevant, forming part of the necessary evidence and justification for any required alterations to Green Belt boundaries.</p> <p>Representations are made to this Method Statement consultation on behalf of Drayton Manor Park (DMP) in relation to the existing Drayton Manor Theme Park and its future development proposals. A site location plan is attached at Appendix A.</p> <p>Representations have previously been made on behalf of Drayton Manor Park to the Local Plan Review: Scope, Issues and Options consultation in June 2018, and to the Local Plan Review: Preferred options & policy directions in January 2019, highlighting the need for the Review to include specific policy provision for Drayton Manor Park. The inclusion of a policy direction within these consultation documents which supports and promotes tourist attractions, including Drayton Manor Park, was and continues to be welcomed and our</p>	Comments noted.	No further comments

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<ul style="list-style-type: none"> • Stage 2: Defining the Study Area; • Stage 3: Identification of Land Parcels; • Stage 4: Designing the Assessment Approach; • Stage 5a: Method Statement Consultation; • Stage 5b: Method Statement Consultation (wider stakeholder consultation) (this stage); • Stage 6: Undertake Detail Site Assessments; and • Stage 7: Publication of Final Report. <p>Stage 1: Context & Background to Review It is noted that in the section on 'The West Midlands Green Belt and Lichfield District' reference is made to the Local Plan Strategy making changes to the Green Belt boundary to accommodate strategic employment, as well as housing growth. Similarly, in the section on 'Existing Green Belt Evidence' attention is drawn to the fact that the Lichfield District Strategic Green Belt Review of 2012 considered employment areas (Major Developed Sites). However, this Green Belt Review Method Statement appears to be focused mainly on housing. It is therefore considered that in order for the Green Belt Review to constitute a robust piece of evidence to inform the Local Plan Review its scope should be much wider and that employment and leisure uses within the Green Belt should also be assessed.</p> <p>Stage 2: Defining the Study Area It is noted that the Green Belt Review will cover all of the Green Belt within Lichfield District. However further comments on the areas identified for assessment within the entirety of the Green Belt are set out under Section 3 below.</p> <p>Stage 3: Identification of Land Parcels The approach of broadly dividing Green Belt land into two categories; 'smaller parcels' and 'broad areas' is supported, as this follows examples of good practice. However, it is unclear from the Method Statement exactly how the 'broad areas' have been defined, for although para.2.64 states that the same</p>	<p>Comments noted. Paragraph 2.64 of the method statement is clear that the approach used to define broad areas is consistent with that of defining small parcels. It also states that given the nature of broad areas the most durable features will be used when defining parcels.</p> <p>Comments noted. The purpose of the method statement consultation was to allow for stakeholders views on the proposed methodology including the parcels which have been identified. Where it is considered parcel/areas should be modified for the purpose of the assessment this will be undertaken.</p> <p>The site noted by the representation is not excluded from the Green Belt</p>	<p>No further comments</p> <p>No further comments</p>

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	<p>approach of using the most recognisable durable features (road, operational railways and water bodies) as for 'smaller parcels' has been employed, by the very nature of a broad area it will contain a number of such features, and no detailed explanation of how these have been selected is included within the methodology.</p> <p>It is also of concern that the parcels have been selected prior to consulting on the methodology with the wider development industry.</p> <p>Whilst the need to identify 'broad' and 'smaller' parcels for the purpose of assessment is necessary, it should be recognised that site-specific proposals are unlikely to reflect the parcels proposed. It is therefore essential that further, finer grained site-specific Green Belt assessments are undertaken, if necessary, to inform the site selection process. The Council should commit to undertaking site specific assessment as a further stage in the Green Belt Review methodology to ensure a robust approach to site selection as an integral element of the plan making process.</p> <p>In looking to define Green Belt boundaries for specific sites it is considered appropriate for the Council to use readily recognisable physical features, which have a degree of permanency.</p> <p>In light of the above, it is considered that there is merit on just focusing on a more detailed Green Belt review of specific sites, once a spatial strategy and alternatives have been developed, informed by other evidence and consultation.</p> <p>With regard to Drayton Manor Park, this lies within Broad Area BA10, which encompasses the whole of the area around Fazeley and Drayton Bassett village to the south and is identified in D.4: Fazeley, Mile Oak & Bonehill of Appendix D of the Method Statement. However, with regard to the Smaller Parcels, the actual area of covered by Drayton Manor Theme Park itself has been omitted, whilst some of the wider area of land owned by DMP lying between the Theme Park and the built-up area of Fazeley has been included within Smaller Parcel FZ5, together with land in other ownerships. It is therefore considered by our client that the entire area of DMP should be included for assessment, especially the area that formed the strategic allocation included within the 'Major Developed Sites in the Green Belt EMP5' in the</p>	<p>Review. If falls within one of the identified broad areas which will be assessed. The methodology sets out the approach used to identify parcels/areas.</p> <p>The former major developed sites policy no longer forms part of the development plan within the District. The 2012 Strategic Green Belt Review concluded that such designations were not in conformity with the NPPF.</p> <p>Comments noted. Consider the approach detailed within the methodology is based on good practice, specifically that used by Arup in a number of Green Belt Reviews. The approach allows for a more nuanced assessment which is considered appropriate.</p>	<p>Identification of Broad Areas – Arup agrees that further explanation is required as to how the broad areas have been defined as they do not include all roads boundaries. They also don't solely include 'A' roads. Arup has often undertaken an exercise to merge broad areas which have similar characteristics in order to reduce numbers down to a manageable amount in the interests of efficiency and proportionality. If the Council has undertaken such an exercise to reach the current broad areas, Arup recommends that this is explained and detailed in the Method Statement.</p>

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	<p>Lichfield District 1998 Local Plan, as defined on Local Plan Map Fazeley Inset 11. It is further considered that to leave this key employment site out of any Green Belt assessment would render the evidence base for the Local Plan Review unsound.</p> <p>Stage 4: Designing the Assessment Approach</p> <p>Concerns are raised in respect of the 'nuanced' rules in determining a parcel/areas overall assessment. The Council's previous Green Belt evidence provided a clear outcome for each parcel determined by the highest category assessed for any of the Green Belt purposes. This afforded a clear, objective assessment for each parcel. However, the proposed approach to apply a number of rules appears far from clear. In addition, the application of these rules is likely to result in no clear assessment; instead resulting in the need to 'apply professional judgement.' The application of professional judgement is clearly open to interpretation and may result in conclusions that are not objective, consistent or clear. For example, will the professional judgement be undertaken by the same individual? Will any weighting be applied to the assessment questions identified in the assessment form?</p> <p>It is noted that the assessment approach will consider all parcels/areas against the 5 purposes of Green Belt set out in the NPPF.</p> <p><i>First Purpose - "To check the unrestricted sprawl of large built-up areas"</i></p> <p>The specific questions in relation to this purpose are considered to be reasonable.</p> <p><i>Second Purpose – "To prevent neighbouring towns merging into one another"</i></p> <p>With regard to how this purpose is proposed to be assessed it is noted that a 'scale rule' approach will be adopted, with references to 1 and 2km throughout the assessment criteria. However, it is considered that the identity of a town should not be determined by the distance to another town alone, but should take account of the town's character, as well as the character of the landscape between the towns.</p> <p>In addition, attention is drawn to the wording of the NPPF, which refers to 'neighbouring towns'. It is noted that LDC's definition of 'neighbouring towns' includes all settlements and therefore encompasses villages and smaller</p>	<p>Comments noted. The 'scale rule' criteria is only one of the criteria included within the assessment form for this purpose.</p> <p>Comments noted. The inclusion of settlements within this purpose is considered to be appropriate and recognise local circumstances within the assessment.</p>	<p>Purpose 2 (scale rule) –</p> <p>Arup recommends that the Council explain why the distances of 1km, 1-2km and over 2km have been used.</p> <p>Definition of neighbouring town –</p> <p>whilst it is correct that all the settlements identified would not usually be defined as a 'town' under normal circumstances, the Council has chosen to use this approach in order to recognise the two 'local roles' which refer to maintaining the settlement hierarchy and preserving the character of villages. Arup recommends that the Council justify their approach within the Method Statement. The Arup Critical Friend</p>

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	<p>settlements, and it is considered that this broad definition clearly does not comply with the NPPF.</p> <p><i>Third Purpose – “To assist in safeguarding the countryside from encroachment”</i> It is considered that all Green Belt acts to safeguard the countryside from encroachment, making this purpose difficult to use to distinguish the contribution of different areas. However, a useful approach is considered to be one which distinguishes between urban fringe areas and open countryside, and that this should be reflected in the specific questions for this purpose.</p> <p><i>Fourth Purpose – “To preserve the setting and special character of historic towns”</i> It is noted that for the first time the Council's Green Belt methodology is to include the settlements of Fazeley, Mile Oak and Bonehill under the umbrella of 'historic towns', together with other larger villages. It is considered that this approach is contrary to the guidance of the NPPF, which explicitly uses the word 'towns' and that there are other Green Belt purposes which deal with villages and their settings; such as the third purpose of assisting in safeguarding the countryside from encroachment.</p> <p><i>Fifth Purpose – “To assist in urban regeneration by encouraging the recycling of derelict and other land”</i> It is noted that the Method Statement acknowledges that this purpose is more difficult to assess, and it agreed that that all Green Belt has a role to play in assisting in urban regeneration by encouraging the recycling of derelict and other urban land. Therefore, rather than scoring all parcels the same against this criterion it is considered that including this purpose in the assessment is of no benefit.</p> <p><i>Undertaking the assessment</i> LDC's Supplementary Green Belt Review of 2013 assessed parcels against the five purposes of the Green Belt as set out within the NPPF, as well as against</p>	<p>Comments noted. The assessment approach set out within the methodology is considered to be appropriate.</p> <p>Comments noted. The inclusion of settlements within this purpose is considered to be appropriate and recognise local circumstances within the assessment.</p> <p>Comments noted.</p>	<p>Review comments on this at Section 4.4</p> <p>No further comments</p> <p>No further comments – see above comment on definition of neighbouring town</p> <p>Purpose 5 – In assessing all parcels as moderate for purpose 5 the Council is recognising that the Green Belt does have a role in assisting in urban regeneration. To assess purpose 5 as 'no' as the comment suggests would not provide this recognition. The Council have explained their justification for this at paragraph 2.84 of the Method Statement.</p>

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	<p>two 'Local Roles' which are explained and justified within the 2013 document. These Local Roles being:</p> <ul style="list-style-type: none"> • Maintaining the local settlement hierarchy and pattern; and • Preserving the character and setting of villages. <p>It is noted that para.2.73 of the Method Statement states that these established local roles will also be included within the Green Belt assessment going forward, but that they are not then included within the overall assessment examples. However, it is also noted that Arup have recommended that these local roles are incorporated into the NPPF Green Belt purposes 2 and 4 'for clarity and completeness' (para.2.86), but that the Method Statement does not actually determine whether or not this will be the case. This is despite the fact that Arup have recommended that if the Council are minded to retain separate criteria for both of the 'local roles', then guidance should be provided as to how the additional criteria will inform the overall categorisation of the purpose e.g. separately or alongside the rest of the criteria.</p> <p>The consideration of the positive uses that Green Belts can serve is welcomed as an addition to the Green Belt Methodology, in line with the guidance at para.141 of the NPPF.</p> <p><i>Assessment Categories</i></p> <p>The inclusion of a 'no role' category in the assessment is welcomed, as it is the case that some parcels/sites may make no contribution at all to the Green Belt purpose.</p> <p><i>Overall Assessment</i></p> <p>It is noted that Arup have recommended that a more nuanced approach be adopted to the assessment, rather than that used in the Council's previous Green Belt evidence. However, the approach advocated is considered to be overly complicated and it is noted that the rules listed do not encompass all eventualities.</p> <p>It is also noted that the methodology states that 'professional judgement' will be applied to what should be an objective assessment of Green Belt parcels/areas. Whilst it is accepted that there will be a judgement of the level of</p>	<p>Comments noted. The local roles from previous Green Belt Reviews have been incorporated into the assessment form.</p> <p>Comments noted.</p> <p>Comments noted. Consider the approach detailed within the methodology is based on good practice, specifically that used by Arup in a number of Green Belt Reviews. The approach allows for a more nuanced assessment which is considered appropriate.</p> <p>Comments noted. Where professional judgement is applied, as</p>	<p>Local Roles – Arup recommends that paragraph 2.73 includes a footnote next to the words 'local roles' to explain that these are not being assessed separately but have been subsumed within the five purposes as otherwise this paragraph may appear confusing.</p> <p>No further comments</p> <p>Overall Assessment – the approach might appear complicated however it ensures that the overall assessments are completed in a consistent manner. The rules do cover all eventualities.</p> <p>Professional judgement – this is only applied where</p>

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	<p>importance of a parcel/are in achieving each Green Belt purpose, affording equal weight to the five purposes is considered essential and the avoidance of an aggregate overall contribution is welcomed. However, it is important that the professional judgement applied should be fully explained in each case, to ensure transparency of this part of the Local Plan Review evidence base.</p> <p>Stage 5a: Method Statement Consultation Use of a 'critical friend' on the Green Belt Review and the methodology is welcomed.</p> <p>Stage 5b: Wider stakeholder method statement consultation (current stage) As this is the current stage of the process no comments are made.</p> <p>Stage 6: Undertake Detailed Site Assessments The terminology used in this section of the Methodology is rather confused. For example, para.2.100 refers to 'each site assessment' rather than a 'broad area' or 'smaller parcel' assessment and there is no explanation as to how sites being promoted for allocation will then be assessed within the context of the broader areas within which they sit.</p> <p>Stage 7: Publication of Final Report The intention to publish a final report is welcomed, but it is noted that the Appendices are to include 'each individual site assessment'. It is not clear whether this is in reference to the 'broad area' and 'smaller parcel' assessments, or whether this will also include assessments of existing and potential development sites. However, it is considered that to be a robust piece of evidence which underpins the Local Plan Review, assessments of all potential sites that are being considered to removed from Green belt should be included.</p> <p>DRAYTON MANOR PARK With regard to the assessment areas/parcels it is noted that Drayton Manor Park itself falls within the very 'Broad area' BA10, but not within any 'Smaller</p>	<p>set out in the scoring approach, this will be explained within the parcel/area assessment.</p> <p>Comment noted. The assessment should refer to parcel/area assessment. It does not relate to specific sites being promoted for development. The methodology will be updated to ensure any references to 'site' rather than parcel/area are corrected.</p> <p>The assessment for all parcel/area will be included within the final document. As above the methodology will be updated to ensure any references to 'site' rather than parcel/area are corrected.</p>	<p>there is 1 'important' category. The last section at the end of paragraph 2.91 explains what is considered when applying professional judgement – paragraph 133 of the NPPF. The judgement should be fully explained.</p> <p>No further comments</p> <p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments						
	<p>parcel'. It is suggested that for a more meaningful assessment against the purposes of Green Belt, it is considered that the site of DMP itself should be included in a 'smaller parcel', together with smaller parcel FZ5, and these have been assessed together as one 'smaller parcel' using the assessment categories as contained in the Council's Green Belt Review Method Statement.</p> <p>In carrying out the assessment the information from the Landscape and Visual Appraisal prepared by Pegasus and attached as Appendix C, has been utilised, as well as information available within the Vision Document at Appendix B and it is intended that this will assist the Council with their assessment of potential sites to be released from Green Belt through the Local Plan Review. The results of this assessment are as follows:</p> <p><i>[LDC author note: the representation then includes an assessment of the site being referred to within the representation using the methodology within the method statement. The assessment undertaken by the consultant on behalf of their client will not be set out within this statement. For clarity The Green Belt Review will undertake parcel/area assessments utilising the methodology. It will not take account of alternative assessments undertaken by stakeholders. The full representation including the consultant's assessment can be made available on request.]</i></p> <p>The above assessment demonstrates that all land within the ownership of DMP performs no contribution to each of the Green Belt purposes of checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns from merging and preserving the setting and special character of historic towns. With regard to assisting in safeguarding the countryside from encroachment, it is determined that it has a minor impact on this purpose and with regard to assisting in urban regeneration, a moderate role under the proposed methodology.</p> <table border="1" data-bbox="405 1169 1184 1268"> <tr> <td>No</td> <td>No</td> <td>Minor</td> <td>No</td> <td>Moderate</td> <td>Minor</td> </tr> </table>	No	No	Minor	No	Moderate	Minor	<p>Comments noted. As set out within the LDC author note adjacent. The consultant's assessment of their site utilising the methodology will not be considered.</p> <p>The purpose of the Green Belt Review is to assess areas/parcels</p>	<p>No further comment</p> <p>No further comments</p>
No	No	Minor	No	Moderate	Minor				

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Under the system proposed by this Method Statement this 3/1/1 split would mean that the majority category is 'no' and therefore the middle category from the split should be the overall, which in this case is Minor. However, were the fifth purpose not included in the overall assessment, then the split would be 3/1 and the overall assessment would lean more towards 'no', meaning no contribution to Green Belt purposes overall for the suggested 'smaller parcel' for DMP.</p> <p>CONCLUSIONS</p> <p>Drayton Manor Park welcomes this opportunity to comment on the Green Belt Review Method Statement and would welcome further positive dialogue with Lichfield District Council in respect of the emerging LDP Review and the Green Belt Assessment.</p> <p>Importantly it is considered that the assessment of how specific sites perform against the purposes of including land in Green Belt should be a one stage process which follows the selection of a spatial strategy, or the selection of alternative strategic options for growth.</p> <p>It is noted that the Green Belt Method Statement is very focused on the accommodation of housing. DMP considers that employment land uses should be considered within the Green Belt Review and that the specific reasons for their exclusion from this methodology should be made explicitly clear.</p> <p>In assessing the land at DMP using the Council's proposed Green Belt assessment considerations it has been determined that the land performs only a minor Green Belt purpose overall, having minor role in assisting in safeguarding the countryside from encroachment, a moderate role in relation to assisting in urban regeneration and no role in relation the other three purposes. It is however considered that this evaluation is skewed by the inclusion of the fifth Green Belt purpose, and that if this were removed from the assessment then the overall assessment would conclude that the DMP parcel would make no contribution to the purposes of Green Belt.</p> <p>As has been presented through several previous Local Plan representations, Drayton Manor Park is a key contributor within the local economy and plays a significant role in the sustainable growth of Lichfield District. The Park has</p>	<p>against the purposes of the Green Belt.</p> <p>As set out within the LDC author note above. The consultant's assessment of their site utilising the methodology will not be considered.</p> <p>Comments noted. The Green Belt Review is a piece of evidence. Comments regarding policy provision should be made at the appropriate consultation stage.</p>	<p>No further comments</p> <p>No further comments</p>

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	<p>future plans for a wide range of sustainable development and growth in order that it can continue to compete and develop in the highly competitive and continually evolving leisure and tourism market; as evidenced in the accompanying Vision Document.</p> <p>In terms of assessment against the purposes of Green Belt as proposed within the Council's current methodology, it has been demonstrated above that Drayton Manor Park performs a minor role, contributing little to Green Belt purposes. There is therefore a clear justification for the allocation of Drayton Manor Park within the</p> <p>Local Plan Review document, to protect the long-term development of the site from the potential barriers to investment caused by full Green Belt designation with a specific policy. Without such a policy the Green Belt designation of the site will hinder the ability of DMP to deliver planned improvements, stay competitive in the leisure industry and may even threaten its viability to continue as a key tourist destination.</p> <p>Drayton Manor Park therefore seeks a policy provision within the Local Plan Review, which would then provide an opportunity to produce a masterplan for the Park's long-term growth. Furthermore, there is a genuine risk that the lack of specific policy provision for Drayton Manor Park within the Local Plan Review, would severely impact any potential investment in the Park's future development plans, and may jeopardise the long-term sustainable growth of the Park. Correspondingly, due to the Park's significance within the economy of Lichfield District, this would have a consequential impact on the growth of the District's economy, tourism, recreation and leisure offer and would mean that key objectives of the adopted Local Plan would not be achieved.</p>		
<p>GB18: Pegasus Group on behalf of Cooper Developments Ltd</p>	<p>This letter provides Cooper Developments Limited (Cooper Developments) representations in response to the consultation on the Green Belt Review Method Statement (June 2019). Cooper Developments are the freehold owners of land off London Road, Lichfield and are promoting their land as a potential residential allocation.</p> <p>Cooper Developments firmly believe that their site (see Appendix 1) would provide a logical and highly sustainable location for new housing and should</p>	<p>The site noted by the representation is not excluded from the Green Belt Review. If falls within one of the identified broad areas which will be</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>be considered as part of any Green Belt Review going forward. We note that the Methodology is not proposing assess land off London Road, as part of a smaller parcel assessment of land south of Lichfield and this is a failing of the Review Method Statement, and one which my client strongly objects to. In terms of our response to the consultation, we have sought to follow and refer to the general chapter headings, sub-headings and paragraph numbers contained within the consultation document so that it is clear to which our response relates. Our comments are as follows:</p> <p><u>Methodology</u></p> <p>Existing Green Belt Evidence</p> <p>We note that the Council intend to draw on existing work carried out within Lichfield District. Whilst we have no objection to this evidence being used as a general approach to the Review process, we are concerned that the 'smaller parcels' for assessment proposed in the Methodology appear to have been carried forward from the 2013 Green Belt Review Supplementary Report which suggests that little regard has been given to any changes in circumstances (particularly addressing cross-boundary needs) and the scale of growth that might need to be delivered through the Local Plan Review itself. For example, many of the 'smaller parcels' proposed for assessment around Lichfield and Burntwood reflect those identified in the 2013 Green Belt Review Supplementary Report. These parcels were identified specifically in the context of the Local Plan Strategy and "around individual settlements where housing growth may need to be considered at a scale where it would make a contribution, or impact on the overall strategy for the District" (paragraph 2.6, Green Belt Review Supplementary Report 2013). Clearly the Local Plan Review is now being advanced, in part, to meet the unmet housing needs of the Greater Birmingham HMA. A new growth strategy will therefore need to be brought forward in the Local Plan Review to meet these needs in the most sustainable way. It is therefore especially disappointing that several locations around Lichfield are not proposed for 'smaller parcel' assessment. For example, the Council have excluded all land south of Lichfield, and in particular land off London Road, for more detailed assessment. There is no</p>	<p>assessed. The methodology sets out the approach used to identify parcels/areas.</p> <p>Comments noted. Parcels/areas have been identified using the approach set out within the methodology. This has been undertaken for the purposes for this review and has not simply been carried forward from previous evidence.</p> <p>Comments noted.</p>	<p>Identification of parcels</p> <p>– Arup recommends that parcels are defined around all inset settlements in accordance with the methodology, for example, the area to the south of Lichfield has no parcels. Whilst development does not abut the settlement boundary, Arup recommends that parcels are still defined, unless the area consists of national or international environmental designations.</p> <p>No further comments</p>

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	<p>explanation why these areas are not proposed for more detailed assessment, but we strongly object to their exclusion. We believe that all locations on the edge of the most sustainable settlement of Lichfield City must be assessed as part of a 'comprehensive' and robust Green Belt Review. In particular Cooper Developments request that land off London Road form part of any assessment.</p> <p>Greater Birmingham Housing Market Area</p> <p>The Greater Birmingham HMA Strategic Growth Study provides a very high-level strategic Review of the West Midlands Green Belt with the aim of identifying broad locations for strategic scale development (1,500 – 10,000 dwellings). Given the wider/strategic scope of this Study and the size of the Green Belt parcels assessed, few conclusions can be drawn from this evidence to support the work Lichfield District Council are now undertaking. However, the Growth Study does stress the importance for 'local' Green Belt Reviews to be carried out to identify smaller scale (less than 2,500 dwelling) urban extensions to be identified alongside the larger strategic development locations.</p> <p>Stage 3: Identification of Land Parcels</p> <p>In general, we support the Council's approach of identifying 'smaller parcels' as well as 'broad areas' as part of the Green Belt Review. It should however be recognised that site specific proposals - put forward by developments/landowners for instance - are unlikely to reflect the parcels proposed for assessment. It is therefore essential that further, finer grained site-specific Green Belt assessments are undertaken to inform the site selection process, using for example, sites put forward within the Strategic Housing Land Availability Assessment (SHLAA). The Council should therefore commit to undertaking a more refined site-specific assessment as an additional stage in the Green Belt Review methodology to ensure a robust approach to site selection as it does not appear that Stage 6 will take into account sites put forward by developers/landowners.</p> <p>At paragraph 2.63 of the Methodology it states that the Green Belt Review will include "identification of smaller parcels be extended to settlements in neighbouring authorities which abut the Lichfield Green Belt". Although some sites have been identified on the edge of Little Aston, few other 'smaller</p>	<p>Comments noted. The purpose of the Green Belt Review is to provide an assessment of parcels/area against the purposes of the Green Belt. If it is considered necessary to undertake further 'fine grain' assessments this would follow the Green Belt Review.</p> <p>Comments noted. Parcels/areas have been identified using the approach set out within the methodology. The approach has been applied consistently.</p> <p>Comments noted. Paragraph 2.64 of the method statement is clear that the approach used to define broad areas is consistent with that of defining small parcels. It also states that given the nature of broad areas the most durable features will be used when defining parcels.</p>	<p>No further comments.</p> <p>Parcels/Sites – It is important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the whole of the Green Belt to be assessed against the</p>

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	<p>parcels’ have been identified to meet cross boundary needs. The Green Belt Review should be prepared on the basis of meeting housing and employment needs of neighbouring authorities and sites identified to assist with this purpose.</p> <p>With regards to the ‘Broad Areas’ identified in Figure 3, it is not clear how these have been chosen from the Methodology. Table 1 explains how the smaller parcels are to be identified, and the approach outlined here seems reasonable and logical. Paragraph 2.64 states that the same criteria have been used to identify the broad parcels, but clearly the larger areas contain many of the features referred in Table 1 (including roads and railway lines etc) but does not explain how the broad parcel were ultimately selected. It would be useful if the Council could explain how and why the broad parcels were chosen as some are particularly extensive, and cross various features that would generally be considered defensible features.</p> <p>Stage 4: Designing the Assessment Approach We agree that any parcels identified will need to be assessed against the purposes of the Green Belt as outlined in the NPPF (paragraph 134) and we do not wish to raise concerns regarding the approach to the overall assessment at this stage. It does however appear that the review methodology is focusing solely on locations on the edge of settlements, which would suggest that the scope of the Review has been predetermined. An entirely ‘policy off’ approach should be carried out when reviewing the Green Belt at this stage. Once the Local Plan</p>	<p>Comments noted. The approach proposed within the methodology is based upon best practice. The Green belt Review will be a comprehensive assessment and assesses all areas of the Green Belt within the District using a robust and proportionate approach.</p>	<p>purposes and the Council can utilise the outcomes from the review for strategic decision making. Submitted sites often have different boundaries to parcels and therefore it is important that a separate assessment is made.</p> <p>Identification of Broad Areas – Arup agrees that further explanation is required as to how the broad areas have been defined as they do not include all roads boundaries. They also don’t solely include ‘A’ roads. Arup has often undertaken an exercise to merge broad areas which have similar characteristics in order to reduce numbers down to a manageable amount in the interests of efficiency and proportionality. If the Council has undertaken such an exercise to reach the current broad areas, Arup recommends that this</p>

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	<p>Review is at a more advanced stage, with housing and employment growth needs better understood, then more detailed site-specific assessment will be necessary to identify sites that can accommodate the scale growth required. The strategic performance of these sites/parcels can then be reassessed having regard to the tests out at paragraph 134 of the NPPF.</p> <p>In terms of other issues, we note at paragraph 2.81 of the Review Methodology that any settlement with historic features, whether they comprise local or national designations, will be defined as a 'historic town' for the purposes of the Green Belt Review. This is a highly unusual approach. Paragraph 134(d) refers specifically to historic towns and a literal meaning should be taken from this i.e. only towns with historic interest should be considered against paragraph 134(d) rather than villages, which include heritage assets.</p> <p>We have welcomed the opportunity to comment on the Green Belt Review Methodology and we hope that the Council will consider our comments in progressing to the next stage of the Review process and we look forward to receiving the Council's comprehensive response to this consultation in due course.</p>	<p>Comments noted. Approach is considered to be appropriate and based on good practice.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>is explained and detailed in the Method Statement.</p> <p>Definition of historic town – the definition of neighbouring 'town' for purpose 2 includes all inset settlements (including villages) therefore this is a similar approach. Arup recommends that further information is provided at paragraph 2.81 justifying the inclusion of the list of historic towns. It is not clear on what basis local and national designations have justified them being considered a historic town. Any input from the Council's Conservation Officer or reference to Conservation Area Appraisals would be beneficial in this regard.</p>
<p>GB19: Cannock Chase Area of Outstanding Natural</p>	<p>Green Belt Review Method Statement Consultation</p> <p>Thank you for inviting comments from Cannock Chase AONB on the above consultation.</p> <p>The inclusion of previous comments made on behalf of the Joint Committee in Appendix B of the Green Belt Review Method Statement are noted. The</p>	<p>Comments noted.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>No further comments</p>

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Beauty Partnership	<p>AONB is concerned that potential sites for Green Belt release lie within the setting of the AONB, notably north of Burntwood and at Upper Longdon. Commitment to detailed landscape character assessments is therefore welcomed. To inform judgement on the appropriateness of any proposed amendment to the Green Belt boundary, such assessment should include analysis of the site's contribution to maintaining the openness of the countryside, and contribution to the setting and special qualities of the AONB. Your attention is drawn to the Cannock Chase AONB Management Plan 2019 - 2024, published in April 2019. Prepared in accordance with Countryside and Rights of Way Act 2000 (CRoW), it sets out how the AONB will be conserved and enhanced. Chapter 4 of the Plan deals with the landscape and planning issues through policies for conserving the AONB's special qualities and respecting local distinctiveness. Section 4.12 refers specifically to the importance of protecting and enhancing the setting of the AONB to ensuring the long-term survival of the special qualities of the AONB, and this is supported by Policy LCP8.</p>		
GB20: Turley on behalf of Redrow Homes Ltd	<p>These representations are made on behalf of Redrow Homes Limited (Redrow) in response to the Green Belt Review (GBR) Method Statement (June 2019). Redrow are promoting approximately 12 hectares of Green Belt land to the south of Highfields Road, Burntwood which represents a sustainable and deliverable residential opportunity for up to 250 new dwellings and public open space (2018 SHLAA Ref: 102). Further details on this site and our specific comments on the GBR Method Statement are provided in turn below.</p> <p>Land south of Highfields Road, Burntwood</p> <p>Your Authority proposed to release this site from the Green Belt in order to provide an allocation for residential use within the Publication version of the Local Plan Allocations (Regulation 19, 2017). This proposal was subsequently omitted (Focussed Changes, 2018) purely because an analysis of housing land supply in 2017 indicated that sufficient land had been identified to meet the Local Plan Strategy housing requirement without the need for further Green Belt releases.</p>	<p>Comments noted. The Green Belt Review will provide a comprehensive evidence base relating to Green Belt for the purposes of future plan-making.</p>	<p>No further comments</p>

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	<p>From a Green Belt perspective, the site was assessed as part of a larger land parcel in the Green Belt Review Supplementary Reports dated 2013 and November 2016 (land parcel ref. "Burntwood South 1 - BS1"). The latter demonstrated that Redrow's land (as part of S1) is appropriate for release from the Green Belt for residential development.</p> <p>Comments on the Method Statement</p> <p>Redrow supports the recognition at paragraph 1.14 that the existing Green Belt evidence provides a robust and tested evidence base which the new and comprehensive GBR will "build upon". The comprehensive approach to assess all of the District's Green Belt is also supported (paragraph 1.14) mindful it is a "policy off" assessment to inform the Local Plan Review (LPR).</p> <p>Parcels and Broad Areas</p> <p>Redrow supports the approach to identifying "smaller parcels" and "broad areas" of land for the GBR. These are identified on Figure 3 and paragraph 2.63 and Table 1 provide some supporting criteria for the definition of boundaries. It is noted that where possible, parcels/areas will be defined firstly by durable features and, where this is not possible, "features lacking durability" will be used. Redrow note that features which are described as being 'Durable' include A and B roads, unclassified adopted highway, existing development with clear and established boundaries and hedgerow (inter alia).</p> <p>Given the clear guidance established within Table 1 and set out within the supporting text (Paragraph 2.63), Redrow are concerned to see that the smaller parcels adjoining Burntwood replicate the 2012 and 2016/17 iterations of the GBR, with a limited number of additional parcels having been identified.</p> <p>Redrow are also concerned that the application of the Council's own definition of 'Durable Boundaries' to identify the smaller parcels has not been uniformly applied. Redrow note that much smaller parcels have been identified adjoining Burntwood with their boundaries following the alignment of lower tier roads than Wharf Lane / Ogle Hay Road. Indeed, B4 and B3 are separated by Meg Lane (a single-track road). Smaller parcels are also identified adjoining other settlements throughout the District e.g. Hammerwich and Armitage. It is</p>	<p>Comments noted.</p> <p>Parcels/areas have been identified using the approach set out within the methodology. These have been identified using the approach set out.</p> <p>Comments noted. Parcel B8 will be reviewed and redefined utilising the methodology and based on guidance from critical friend.</p>	<p>No further comments</p> <p>No further comments</p> <p>Parcel B8 – Arup agrees that parcel B8 should be reviewed with Wharf Lane and Ogle Hey Road forming boundaries. The area to the east of Ogle Hey Road would then not be required as a parcel.</p> <p>Green Belt release - It should be noted that parcels do not necessarily translate into areas of Green Belt for release.</p>

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	<p>therefore entirely appropriate for smaller parcels to be identified to the south of Burntwood and this is particularly relevant to B8.</p> <p>In respect of the parcels adjoining settlements, it is critical that the GBR identifies discreet areas of land logically defined by clear natural features including visual/physical/defensible boundaries (to reflect NPPF para. 139 and the concept of permanence). This is because the assessment must provide a comparative and consistent assessment of how individual parcels contribute to the five Green Belt purposes. This will allow parcels to be easily distinguished when considering necessary and appropriate Green Belt releases.</p> <p>The definition of land parcels is particularly relevant at Burntwood given that Green Belt releases will be required here to reflect the following factors;</p> <ul style="list-style-type: none"> • The District's second largest settlement and identification as "Other Large Centre" in the current Local Plan Strategy (February 2015). It was to accommodate approximately 13% of the District's housing requirement to 2029 but this level of contribution will not actually be delivered given that insufficient allocations were proposed here in the Local Plan Allocations; • The SA (February 2015) concluded that Burntwood is one of the District's most sustainable settlements with additional growth delivering a more sustainable, healthier and self-contained settlement; • It is a settlement requiring inward investment to ensure that the economy and existing centres can grow commensurate with the population; • The LPR Preferred Options and Policy Directions paper proposes to retain Burntwood as the second tier settlement ("Other Main Centre") as a preferred area for residential and employment growth (Figure 22.1); and • Paragraph 8.122 of the Strategic Growth Study states that there are opportunities to accommodate various scales of "proportionate 	<p>Consider that the approach to parcel/area identification has been applied consistently in accordance with the approach set out within the methodology.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>Arup recommends that submitted sites are assessed separately for their contribution to Green Belt, unless their boundaries are exactly the same as a parcel.</p> <p>No further comments</p>

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	<p>dispersal” on the complex urban edges of towns to the north of Walsall, including Burntwood, which would not significantly compromise the strategic function of the Green Belt.</p> <p>It is for these reasons that Redrow contends that Parcel Ref. B8 to the south of Burntwood (as identified in the 2016/17 assessment, and which is identified at Appendix D.2) should be split into two or three separate parcels to reflect the presence of two roads – Wharf Lane (which adjoins Crane Brook) and Ogle Hey Road – which intersect the Parcel. These roads provide clear physical and defensible boundaries – therefore “durable” – which separate B8 in to two or three different parcels. This suggestion is entirely consistent with the recommendation in the Supplementary Green Belt Report (p16 and 17, November 2016):</p> <p><i>“...[the site] only plays a moderate role in terms of safeguarding the countryside from encroachment”</i></p> <p><i>“...an assessment of this smaller area [the land now promoted by Redrow] could result in a different outcome to that within the 2013 report. Proposals for the site could see the establishment of a defensible boundary which defines the Green Belt through the establishment of a new defensible boundary bounded by open space as a screen to the M6 Toll”</i></p> <p><i>“Parts of parcels S1[now B8] should be considered to be released from the Green Belt...The site is closely related to the settlement with access to facilities and would provide an additional quantum of development which could assist in the maintenance/improvement of services and facilities within the settlement ... The southern field boundary should be used as a defensible boundary...” (emphasis added)</i></p> <p>It is therefore requested that B8 be split into smaller parcels; at the very least to provide two parcels separated by Wharf lane.</p> <p>The Proposed Assessment</p> <p>We offer the following comments:</p>		

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	<ul style="list-style-type: none"> • Redrow support the “nuanced approach” to assessment (para 2.91) as this will allow for a finer grain assessment to be carried out which will not result in an artificially swayed assessment of sites. • In relation to the proposed questions in Appendix A, it is unclear what degree of weight will be placed upon the “contributions” on page 26 relative to the five Green Belt purposes. We would welcome further clarification on this, particularly as there could be overlaps between the two which could result in an element of double-counting; • The questions on page 37 are overly focused upon the existing contribution of sites and do not adequately consider potential contributions. By way of example, the first question on opportunities for public access only queries the degree of existing public access. • Redrow support a further round of consultation following Stage 5a (para. 2.95), although recommend that a further round of consultation should be undertaken following the site assessments in Stage 6 and prior to Stage 7, to ensure that these are robust and consistent. <p>Redrow trust that the information provided within these representations will be considered by the District Council and welcome the opportunity to comment on further iterations of the GBR in the coming months.</p>		<p>Degree of weight – Each of the five purposes should be given equal weight. The questions in Appendix A are intended to assist the assessor in coming to a conclusion on the level of contribution. There should not be overlaps between the different purposes. Arup recommends that reference to coalescence in purpose 1 is removed to avoid any double counting with purpose 2.</p>
<p>GB21: Avison Young on behalf of Metacre</p>	<p>Avison Young is instructed by Metacre Ltd to make representations in respect of the Council's Green Belt Review Method Statement which was published for consultation in June 2019. Metacre has a number of concerns about the approach that the Council is proposing to take to the Review and the results that the Review might generate if the methodology is not adjusted. These are set out below.</p> <p>Preamble The primary purpose of the Review is, or should be, to help the Council identify land that is suitable for development and may, therefore, be released from the Green Belt and allocated for either housing or commercial</p>	<p>Comments noted. The purpose of the Green Belt Review is to assess parcels/areas against the purposes of the Green Belt.</p>	<p>No further comments</p>

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	<p>development in the emerging Local Plan. Critically, therefore, the Review needs to identify those parts of the Green Belt that absolutely must be kept open and free from development (i.e. retained washed over) and those that need not, and are less valuable in Green Belt terms. Where possible, the Review should then go on to help the Council differentiate, in Green Belt terms, between the various land parcels that fall in the latter category, albeit accepting that there will be other (non-Green Belt) factors that will help it make final judgements. Any Review that the Council embarks upon must be carried out in a manner that is consistent with national planning policy. In this respect, and because the extent of the West Midlands Green Belt, and its outer and inner boundaries, are already established, the starting point must be paragraphs 138 and 139 of the NPPF which read as follows:</p> <p><i>“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.</i></p> <ul style="list-style-type: none"> <i>a) When defining Green Belt boundaries, plans should: ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;</i> <i>b) not include land which it is unnecessary to keep permanently open;</i> <i>c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching ell beyond the plan period.</i> 	<p>Comments noted. The purpose of the Green Belt Review is to assess parcels/areas against the purposes of the Green Belt. It is not a matter for the Green Belt Review to consider issues related to potential spatial strategies.</p>	<p>Scope and purpose of the Review - A Green Belt Review is intended to be an objective, evidence-based assessments of how the Green Belt contributes to the five purposes set out in national policy. Should the Council consider it necessary to release Green</p>

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	<p>d) <i>make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;</i></p> <p>e) <i>be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and</i></p> <p>f) <i>define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</i>"</p> <p>We note that the Council's methodology focusses almost exclusively on assessing whether land parcels are fulfilling one or more purposes of the Green Belts as set out within paragraph 134 of the NPPF and (i) makes no provision for an assessment of the extent to which boundary adjustments would further sustainable development objectives and (ii) makes no provision for an assessment of the extent to which removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land ; (iii) makes inadequate provision for assessments of openness; (iv) and undervalues or underplays the importance of appropriately sized development parcels having boundaries that are readily recognisable and likely to be permanent. Whilst we agree that it is important to assess the extent to which land parcels are currently fulfilling one or more of the nationally established purposes of Green Belts, these omissions are important and go directly to the robustness of the Review and its outputs. Insofar as (i) above is concerned, the Review must recognise, for example, the importance of accommodating the majority of the required growth at Lichfield and Burntwood. The Council must find a way of reflecting this key policy objective in the assessment process.</p> <p>Determining the Assessment Approach</p> <p>There is reference in paragraph 2.73 to 'local roles'. The NPPF does not recognise local roles. Green Belts are a strategic planning tool that, by keeping land permanently open, are designed to achieve the strategic planning</p>	<p>Comments noted.</p> <p>The definitions within the methodology are based on good practice and intended to provide clarity as to how certain terms will be considered in the context of the Green Belt Review. It is not considered necessary to 'define' the word unrestricted.</p> <p>Comments noted. Consider the inclusive of the settlements defined within the methodology is</p>	<p>Belt land, the Review will inform decision making on this and an exceptional circumstances case would need to be made. The Review would be considered alongside other Local Plan evidence as part of a site selection process.</p> <p>Openness and boundary definition – the method explains the approach to assessing openness and includes a boundary definition methodology explaining how the parcels were defined. Considerations relating to compensatory improvements, sustainable development, and accommodating growth are not relevant to a Green Belt Review.</p> <p>Green Belt Purposes – Paragraphs 2.74-2.84</p>

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	<p>objectives set out in NPPF paragraphs 133 and 134. We note that there are no standalone 'local' criteria in the example Assessment Form contained within Appendix A to the Method Statement and it is important that this remains so. In paragraphs 2.74 – 2.84, the Council attempts to unpick and / or redefine the purposes of Green Belts. This is not necessary or appropriate and the way in which the Council 'interprets' the purposes is flawed. The reasons for this are as follows:</p> <p>Purpose (a) The Council correctly identifies 'sprawl' and 'large built up areas' as key words but overlooks the word 'unrestricted' which is critical. The Council also states that 'specific consideration is that the large built up area could become physically joined to other areas by outward sprawl'. This is not the case. The Council is inappropriately conflating purposes (a) and (b) which are completely different and totally separate. In addition, its definition of 'large built up areas' is inappropriately narrow. This should be reassessed in the context of the District and the following settlements should be included: Hopwas, Shenstone and Fazeley.</p> <p>This purpose is concerned with the utilisation of Green Belt policy to guard against development expanding over a large area in an unrestricted manner. Accordingly, large parcels of land on the edges of large built up areas, whether they have clearly recognisable and permanent boundaries or not, will be performing a purpose (a) role. Conversely, small parcels with clearly recognisable and permanent boundaries will not (because development of such parcels would neither constitute sprawl and nor would it be unrestricted).</p>	<p>considered appropriate and based on good practice.</p> <p>Comments noted. The approach to assessment to the fifth purpose is considered appropriate and consistent with good practice, for example Cannock Chase District Council's Green Belt Review. Previous Green Belt evidence in the District took the approach recommended by the representation and removed the fifth purpose from the assessment. However following the good practice review and advice from Arup it was considered appropriate to include and assess in the manner which is proposed.</p>	<p>provide definitions for the five purposes in the context of Lichfield. It is good practice to define the terminology and relate it to the local context in order to enable an assessment to be undertaken.</p> <p>Purpose 1 – the word 'unrestricted' has not been overlooked, unrestricted simply further enhances the meaning of sprawl. Arup recommends that the Council remove any reference to coalescence within purpose 1. Arup considers that the definition of 'large built up areas' is appropriate. Purpose 1 specifically refers to 'large built up areas' and therefore this should be distinguished from purpose 2 for example, which specifically refers to 'towns'. The Local Plan Strategy (2015) identifies Lichfield and Burntwood</p>

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	<p>Purpose (b) This purpose is very clearly concerned with the merging of towns and not villages, or towns with villages. To extend the meaning of this purpose is not appropriate. If there are concerns about settlements merging at the local level (e.g. between villages), these can be addressed by local policies. The word 'merging' has an absolute meaning and this must be reflected in the Council's assessment. If the development of a parcel would not result in the actual or perceived coalescence of two towns, then the parcel is not performing a separating role in accordance with purpose (b).</p> <p>Purpose (c) We would expect there to be little controversy in establishing what is and is not countryside. However, see our comments below on the Council's assessment criteria. Also, the Council should recognise in its methodology that countryside will include land that is home to buildings used for agriculture, forestry, a variety of rural enterprises and outdoor leisure. Encroachment is simply any development that occurs on land that is currently countryside.</p> <p>Purpose (e) The Council notes that all Green Belt plays a part in encouraging new development to the urban areas. It goes on to state that all parcels will, therefore, be scored the same against this purpose. We have two concerns about this. First, certain land parcels within the District may actually make a different level of contribution in this respect than others. For example, it is acknowledged by the Council that there is no urban capacity to speak of in Burntwood and so if this settlement is to grow, it will need to expand into the Green Belt. Put another way, the Green Belt around Burntwood has already done its job but is now impacting adversely on the Council's ability to deliver sustainable development and so it is time for the Green Belt boundary here to be amended. This may not be the case for all settlements in the District. Secondly, if the Council demonstrates ultimately that all land parcels should indeed be scored the same against purpose (e), then the scoring for (e) should have no effect whatsoever on the outcome of the assessment – it should be</p>		<p>as the two main settlements and therefore these have been included alongside Birmingham and Walsall.</p> <p>Purpose 2 – It is commonplace for Councils to include all settlements including inset villages in their assessment of purpose 2. The Greater Birmingham HMA Strategic Green Belt Review, the Cannock Chase Green Belt Review and Tamworth Green Belt Review all use this same approach.</p> <p>Purpose 3 - No further comments</p> <p>Purpose 5 – In assessing all parcels as moderate for purpose 5 the Council is recognising that the Green Belt does have a role in assisting in urban regeneration. To assess purpose 5 as 'no' as the comment suggests would</p>

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	<p>neutral. The only way to ensure that this is the case is not to score it at all and, instead, discount it from the review. If it is afforded a score of 'Moderate' it will almost certainly be determinative in certain cases and this cannot be right.</p> <p>Assessment Categories At paragraph 2.90, the Method Statement defines the terms Important Role, Moderate Role, Minor Role and No Role. Against Moderate Role and Minor Role, the Council refers to 'elements' of purposes. There is no such thing. Each of the purposes as defined in the NPPF is singular. The purposes cannot be broken down into constituent elements and a view taken on whether part of the purpose is satisfied and another not. They do not work this way. The Council needs to revisit its definitions and must take care with its use of terminology and how this feeds through into its assessment. As it currently stands, the words at 2.90 are inappropriate and suggest that the assessment that the Council is planning to undertake in due course could be conducted on an unsound basis or an inappropriate understanding of what Green Belt policy is designed to do / how it should be applied.</p> <p>Overall Assessment The Council should reconsider its position on the use / application of the terms Important Role, Moderate Role, Minor Role and No Role in the light of the comments above on purpose (e) and paragraph 2.90. It is misleading to suggest that professional judgement is only to be applied or relied upon in certain circumstances (i.e. when a certain set of results is generated). The Council and Arup will be applying professional judgement throughout the assessment process. This is acceptable so long as the judgements that are made are accurate, robust and consistent.</p> <p>Assessment Form If the Council proceeds to assess land parcels using the Form at Appendix A to the Method Statement, its assessment will not be sound. There are several reasons why this is the case and these include:</p> <p>Purpose (a) The questions that the Council asks should determine (i) whether the land parcel abuts a large built up area; and (ii) whether development of the parcel</p>	<p>Comments noted. The reference to elements is designed to refer to the criteria which will be assessed as is set out within the assessment form. This will be changed to make clear that it is referring the assessment criteria.</p> <p>'Large-area' is defined within the methodology for the purposes of the assessment. The Assessment form which will be used for each parcel/area assessment details the criteria and parameters used for the assessment.</p> <p>'Rounding off' is one part of the assessment criteria for the first purpose and will not necessarily mean unrestricted sprawl cannot be assessed.</p>	<p>not provide this recognition. The Council have explained their justification for this at paragraph 2.84 of the Method Statement.</p> <p>Green Belt purposes – It is commonplace for each of the five purposes to be broken down using several criteria or questions and assessed to form an overall conclusion on that purpose. This enables a robust and consistent assessment of each purpose.</p> <p>Professional judgement – Paragraph 2.9 of the Method Report acknowledges from the outset that professional judgement is involved.</p> <p>Rounding off – The consideration of rounding off forms one element of purpose 1 and given that the purpose focuses on</p>

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	<p>would extend over a large area before hitting a clearly defined and permanent boundary (the Council will need to define what 'large area' means and will need to do so in a robust manner). If the extent to which a parcel abuts a large built up area is small and it has clearly defined and permanent boundaries, it is not performing a purpose (a) role. To determine the extent to which parcels are preventing unrestricted sprawl in other cases, the Council will need to define robust parameters that enable it to differentiate between the extent of sprawl that might occur if the parcel is developed. For example, if a parcel extends over a large area, or has no clearly defined and permanent boundaries, the likelihood is it will be performing an important role in terms of purpose (a), whereas a similar but smaller parcel will be performing less of a role. The criteria defined by the Council in the Method Statement do not tackle the fundamental aims of purpose (a). It is wholly inappropriate for the Council to assume that if the development of a parcel would result in 'rounding off' then this cannot constitute unrestricted sprawl. Openness should be assessed as a separate factor.</p> <p>Purpose (b)</p> <p>The questions that the Council asks should enable it to determine (i) whether the land parcel lies between two towns; and (ii) whether, if developed, it would result in two towns merging. If the answer to either of these questions is no, then the parcel is playing no role insofar as purpose (b) is concerned. If the answer is yes to (i) but no to (ii) then it would be sensible for the Council to examine the extent to which any gap would be eroded, if the parcel were to be developed, in order to determine whether it is playing a minor or moderate role insofar as (b) is concerned. However, it will need to take care when setting its parameters having regard to the fact that purpose (b) is expressed in absolute terms and, for example, it would be completely inappropriate to conclude that leaving a residual gap of 1KM means that the parcel being assessed is performing a moderate role. With a 1KM gap between towns, there would be no actual or even perceived coalescence. Of course, if the answer to (i) and (ii) is yes, then the parcel is clearly playing an important role insofar as purpose (b) is concerned.</p>	<p>Comments noted.</p> <p>Comments noted. Consider the approach proposed is appropriate and based on good practice.</p>	<p>'sprawl', it is considered that if development gives the settlement a more 'rounded' pattern, it could not be defined as sprawl and would therefore not result in sprawl.</p> <p>No further comments.</p>

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	<p>Purpose (c) The Council's assessment criteria for purpose (c) appear to suggest that there are bits of countryside that are more countryside than others. This cannot be correct. If, on the basis of any sensible definition, a land parcel comprises countryside, the Green Belt in this location is fulfilling a purpose (c) role. This should, therefore, be a straightforward, black or white assessment and this should be reflected in the way in which the scoring of purpose (c) impacts on the overall assessment. We would expect the overwhelming majority of the land parcels to comprise countryside and therefore rated as performing a purpose (c) role.</p> <p>Purpose (e) As noted above, if the Council takes the view that all land parcels should be treated the same in terms of purpose (e), then steps should be taken to ensure that purpose (e) cannot be a determinative factor in the overall assessment of any parcel.</p> <p>A Different Approach In the light of the above, and in addition to considering / addressing the various points made in respect of definitions, interpretation and assessment criteria, the Council should give consideration to assessing certain settlements in a bespoke or tailored manner. This should reflect the issues that they present and the role that they are expected to play in terms of the Council's spatial strategy. For example, in the case of Burntwood, the Council should consider ignoring Green Belt purposes (c), (d) and (e) and should seek to differentiate between parcels, if it can, by carrying out a more thorough and detailed analysis of the role that parcels play insofar as purposes (a) and (b) are concerned.</p>		<p>Proposed different approach – The proposed approach in the comment would mean that parcels would not be consistently assessed against all five purposes, and the method would be tailored to settlements which could look like the Council is trying to fix the outcomes of the assessment for certain settlements.</p>
<p>GB22: Define on behalf of Bloor Homes</p>	<p>LICHFIELD DISTRICT COUNCIL GREEN BELT REVIEW 2019: METHOD STATEMENT BLOOR HOMES LAND INTERESTS TO THE</p>		

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>SOUTH OF LICHFIELD, WEST OF MILE OAK & EAST OF SHENSTONE</p> <p>I write on behalf of my clients Bloor Homes Ltd who welcome the preparation of the Lichfield District Local Plan Review and support the intention to positively plan for sustainable development and growth in the District in the period to 2036. We have previously made detailed submissions in response to the “Preferred Options & Policy Directions” in relation to the housing growth needs in the District and the wider Housing Market Area and the emerging spatial strategy. Those representations highlighted that a review of the District’s Green Belt is required to allow the release and allocation of sites for development where they are best placed to address the identified housing needs and delivery can be ensured and supported through the provision of new and enhanced infrastructure.</p> <p>Indeed, whilst the Green Belt is an important policy consideration, the overall sustainability and deliverability of the identified development options must be the determinative considerations. As the Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study (SGS) recognises (para. 8.134) even where an area might perform a key role in the Green Belt, the local geography and locational guidance in the NPPF means that the development potential of these areas should be positively considered as their <i>“exclusion could mean a significant missed opportunity for achieving a balanced planning outcome across the study area.”</i></p> <p>Therefore, Bloor Homes welcome the Green Belt Review 2019 and the opportunity to comment on the proposed methodology. It is important that the Review is based on a robust assessment that, where appropriate, builds on the findings of the previous assessments. You will also be aware from the submissions referred to above, that we have already undertaken a full suite of assessments of the Bloor Homes sites at Lichfield, Shenstone and Mile Oak and prepared Masterplans that directly respond to their findings and highlight the specific merits of those sites as appropriate locations for future growth. Those assessments included site specific Green Belt appraisals and clearly this Review should also take full account of those.</p>	<p>Comments noted. The consultant’s assessment of their site utilising the methodology will not be considered.</p> <p>Comments noted. The parcels/areas have been identified using the approach set out within the methodology.</p>	<p>No further comments</p> <p>No further comments</p> <p>No further comments</p>

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	<p>Parcel Identification It is understood that the findings of the Review will be considered alongside other elements of the evidence base to directly inform the Local Plan Review's spatial strategy. We would, therefore, expect the identification and definition of the land parcels that are to be assessed, to be focused on areas of search that would contribute to a sustainable spatial strategy, to reflect the scale of growth required in terms of and to relate to the potential allocation sites that have been identified through the Strategic Housing Land Availability Assessment.</p> <p>Parcel Size Indeed, careful consideration of the extent of Green Belt parcels that are to be assessed is essential, as a change of parcel scale can significantly affect the assessment conclusions. Fundamentally, the parcels need to be appropriately sized to allow their actual role in the Green Belt to be accurately assessed. Green Belt parcels that are too large or span geographical thresholds usually have highly contrasting performance against Green Belt purposes across their extent. For example, the urban edge might be more important in respect of containing urban sprawl than more open land away from the urban edge, whilst the urban fringe is less likely to perform strongly in respect of avoiding coalescence of towns and countryside encroachment. This divergence in performance would distort the assessment conclusions, and could misinform the spatial strategy.</p> <p>However, nor can the parcels be so tightly drawn (i.e. always to the nearest identifiable boundary) that it means that a realisable opportunity for sustainable development is not appropriately assessed as a consequence. That would undermine the value of the Review in terms of its role in informing the Local Plan Review. Clearly an element of professional judgement is required to identify appropriate parcels for assessment that will provide valid conclusions that can effectively inform the determination of the future spatial strategy in the District.</p> <p>As highlighted above, the starting point for that should be the sites identified through the Strategic Housing Land Availability Assessment in appropriate areas of search that would accord with a sustainable development strategy. If</p>	<p>Comments noted. The parcels/areas have been identified using the approach set out within the methodology. The identification of smaller parcels and broad areas allows for a proportionate approach to assessment.</p> <p>Comments noted. The parcels/areas have been identified using the approach set out within the methodology.</p> <p>The parcels/areas have been identified using the approach set out within the methodology. In this case the durable feature used is not consistent with a promoted sites boundary. The site promoted falls within a small area and broad parcel.</p>	<p>No further comments</p> <p>Parcels/Sites – It is important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local</p>

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	<p>that would mean that an illogical (in Green Belt terms) and/or over sized site needs to be assessed, then a sub-division should be considered to avoid the potential pitfall highlighted above. However, in any event its critical that both any contrasting performance of land within the parcel in respect of the Green Belt purposes and the scope of effective primary mitigation (see below) should be considered as part of the qualitative assessment.</p> <p>In light of the above matters, a number of specific concerns have been identified in relation to Bloor Homes land interests at Mile Oak and Shenstone:</p> <p>Mile Oak</p> <ul style="list-style-type: none"> Parcel FZ1 incorporates the eastern part of Bloors Homes' site at Sutton Road & Hints Road, with the western parcel boundary presumably drawn along the "nearest durable feature". That means, however, that the western part of the site would be excluded from the assessment, even though it could and should form part of an entirely appropriate development allocation site. If considered necessary for assessment purposes, the two parts of the submitted site could be sub-divided in the assessment to highlight any differentiation in the role the land plays in terms of the Green Belt purposes. You will, however, be aware that our assessments have highlighted both the limited role of the Green Belt in this area and the scope for providing effective mitigation of any harm in the submitted Masterplan. <p>Shenstone</p> <ul style="list-style-type: none"> The land to the east of Shenstone have not been considered in earlier Green Belts Assessments undertaken by the District Council. Parcels S6 and S7 incorporate the majority of the Bloor Homes' site to the east of Shenstone. However, there areas of land outside of those Parcels that could and should part of an entirely appropriate development allocation site to provide, as the Masterplan submitted by Bloors proposes strategic highway and green infrastructure. 	<p>The parcels/areas have been identified using the approach set out within the methodology. In this case the durable feature used is not consistent with a promoted sites boundary. The site promoted falls within a small area and broad parcel.</p> <p>Comments noted.</p>	<p>Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the whole of the Green Belt to be assessed against the purposes and the Council can utilise the outcomes from the review for strategic decision making. Submitted sites often have different boundaries to parcels and therefore it is important that a separate assessment is made.</p> <p>No further comments</p>

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	<p>Furthermore, the area to the north of S7 where the Masterplan suggests an element of employment development would be appropriate has been excluded.</p> <ul style="list-style-type: none"> Notwithstanding that, it is noted that S6 and S7 are relatively large parcels where there is likely to be a notable differentiation within the parcels in terms of the role the land plays in relation to the Green Belt purposes. Some further sub-division would be appropriate to allow a fair comparison to other parcels around the settlement, but in any case a qualitative assessment of the varying performance of the land within the parcels needs to be undertaken, taking account of the scope for primary mitigation of any harm (as set out in the submitted Masterplan). <p>Green Belt Purpose Assessment Criteria The Methodology appropriately seeks to define the terms within the NPPF's stated Green Belt purposes in a local context to provide clarity in the assessment. However, Green Belt is a strategic scale land use and place shaping policy and as such it is important that its role and purposes are considered qualitatively at a strategic level. In relation to Green Belt 1, we agree with the defined terms but the criteria and 'Questions' set out in Appendix 1 also include elements of coalescence and openness. Consequently, there is a significant overlap with Purposes 2 and 3, and that would potentially distort the conclusions and misinform the spatial strategy. We would, therefore, welcome a revision to the methodology to reflect Arup's recommendations in this respect. The assessment of this purpose should focus on how the urban edge is perceived and experienced and whether the development of the parcel would result in an unnatural or illogical urban form. The Planning Advisory Service in their February 2015 publication 'Planning on the Doorstep: The Big Issues – Green Belt', recognised that there are qualitative aspects to assessing sprawl</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>The purpose of the Green Belt Review is to assess parcels/areas against the purpose of the Green Belt. Issues of mitigation will not be considered as part of this assessment.</p>	<p>No further comments</p> <p>No further comments</p> <p>Purpose 1 - Arup recommends that the questions and categories for purpose 1 are refocused to consider sprawl only, for example the moderate and important categories refer to 'coalescence' which will be considered as part of purpose 2.</p>

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	<p><i>(‘is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?’).</i></p> <p>Moreover, whilst the NPPF focuses (para 139f) on physical features that will endure, a strong boundary should not translate as the reason for a site to be taken out of the Green Belt, and a weaker boundary similarly should not be a reason for a site to not be taken out of the Green Belt. Professional judgment should apply and in certain situations where a strong physical boundary cannot be identified, there are ways either through design (such as primary highway infrastructure and strategic landscaping) that could have the same effect on creating a strong Green Belt boundary for future development plans where such a boundary does not exist at present.</p> <p>In respect of Green Belt Purpose 2, in general terms the methodology is robust, but there also needs to a narrative to understand the perception of coalescence in qualitative terms. As the Arup’s advice highlights, this approach is as advocated by the Planning Advisory Service in the document referred to above, which states:</p> <p><i>“A ‘scale rule’ approach should be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land in between must be taken into account. Landscape character assessment is a useful analytical tool for use in undertaking this type of assessment.”</i></p> <p>In respect of Green Belt Purpose 3, we agree with the assessment criteria, but re-emphasise, how these criteria relate to the definition of parcels, and variation across the parcel is critical to the assessment’s accuracy.</p> <p>In respect of Green Belt Purpose 5, we agree that all Green Belt Parcels in the District should be scored the same in relation to this parcel. However, the stated intention to score the all parcels as making a moderate contribution is inappropriate in the context of the relatively limited quantity of previously developed land available in the District. Moreover, as Arup’s have highlighted in their advice to the Council, it skews the assessment’s findings so that no site can be assessed has having a “minor” role overall. That will inevitably make it</p>	<p>Comments noted.</p>	<p>No further comment.</p>

Stakeholder	Comments	Council’s response to comments	Arup response to Council comments
	<p>more difficult to distinguish between the relative merits of the sites being assessed.</p> <p>Scope for Mitigation In any assessment of a parcel, the ability of the individual sites to mitigate or compensate for their effect on Green Belt purposes should be considered. That should take account of any contrasting performance of land in respect of Green Belt purposes within the parcel. In our view this should consider how the change that is proposed in the land promoted to be taken out of the Green Belt is handled to minimise effects on the Green Belt purposes. It should also address how retained open land, both inside and outside of the proposed Green Belt boundary promotes active and positive use of this land for existing and future population.</p> <p>Potential Benefits Indeed, the assessment should take account of the potential benefits that can be realised. NPPF paragraph 138 states in its final sentence: <i>“They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”</i> This paragraph should be read in conjunction with NPPF2 paragraph 141, which states: <i>Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.</i> There are, therefore, additional factors that could influence the current and potential future performance of the Green Belt. The Green Belt Review should consider the accessibility and potential for the Green Belt parcel to provide for outdoor sport and recreation, enhance landscapes and increase biodiversity. This will include an understanding of the existing accessibility to these features, and the scale of population that could benefit from this accessibility.</p>		<p>Scope for mitigation – this is not relevant for a Green Belt Review to consider.</p> <p>Beneficial uses – the assessment form at Appendix A does include a section to identify beneficial Green Belt uses as identified in the NPPF.</p>

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GB23: Barton Willmore on behalf of University Hospitals of Derby and Burton NHS Foundation Trust (UHDBT)	<p>In the main, UHDBT support the methodology for the Green Belt Review produced. In particular, building on the previous Green Belt work (that identified the Sir Robert Peel Hospital (SRPH) site in Fazeley as not providing a Green Belt function). We agree a new study should not ignore these previous findings but build on this existing work in providing a more comprehensive assessment.</p> <p>The only issue UHDBT have with the methodology is that it seeks to combine the SRPH site with the adjacent land to the west in parcel FZ2 (see attached). The previous Green Belt study had 2 separate parcels for these sites, F2 and F6, (also shown on the attached) accepting the different character of these areas. We consider that Parcel FZ2 should be split into 2 discrete parcels as concluded appropriate in the previous assessment. Nothing has changed on the ground to suggest why this should no longer be the case. Indeed it would ensure consistency with the previous work.</p>	<p>Comments noted.</p> <p>The parcels/areas have been identified using the approach set out within the methodology.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>No further comments</p> <p>No further comments</p>
GB24: Harris Lamb on behalf of Barratt Homes West Midlands	<p>We are instructed by Barratt Homes West Midlands to submit representations to the Green Belt Review Method Statement Consultation document. Barratt Homes have land interests within Lichfield District that we believe are suitable to meet the housing requirements of the District in the next version of the Local Plan. These representations specifically refer to Land at Sheepwash Farm, Whittington. The site currently lies within the Green Belt, directly adjacent to the eastern settlement boundary of Whittington. A site location plan is attached for your information.</p> <p>Barratt Homes are promoting the site for residential development and are seeking the site's removal from the Green Belt and inclusion in the Local Plan as a residential allocation. It should be noted that this is a standalone site and is not associated with any other residential developments in the area. The site is considered deliverable and has no technical, physical or environmental constraints that would prevent its development and will contribute to the supply of housing in the District and the Greater Birmingham Housing Market Area (GBHMA), in the short term.</p> <p>Purpose of the Green Belt Review</p>	<p>Comments noted.</p> <p>Comments noted. The method statement does not state that</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>As outlined within the Green Belt Review Method Statement, the purpose of the Green Belt Review is to undertake an independent and robust assessment of areas of land to determine the extent to which they meet the five purposes of Green Belt, as set out within paragraph 134 of the National Planning Policy Framework (NPPF). Green Belt boundaries can only be altered in exceptional circumstances as per paragraph 136 of the NPPF.</p> <p>It is acknowledged in the consultation document that exceptional circumstances exist, due to the limited available urban capacity within Lichfield District that is required to meet the unmet housing need arising from both Lichfield District and within the GBHMA. A detailed Urban Capacity Assessment (UCA) was undertaken by Lichfield District Council in 2016. The overall conclusions from the UCA suggest there is a need to consider the Green Belt boundaries for a number of settlements including Whittington, which at the time was approximately 70 dwellings short of the housing requirement set out within the LPS. The UCA states that growth beyond the settlement boundary requiring Green Belt release would only need to be sufficient to accommodate this level of growth. However, as aforementioned, the housing requirements for Lichfield will increase significantly going forward, and subsequently there is a need to consider the release of a far greater amount of land from the Green Belt.</p> <p>The settlement sustainability study (October 2018) identified Whittington as a 'level 3 – larger service village' in the settlement hierarchy. Settlements within this level of the hierarchy have been assessed as being the most sustainable of the rural villages and benefit from a range of services and facilities and access to public transport. These settlements are considered to be capable of supporting residential growth with the only locations above them in the hierarchy being the Strategic Centre of Lichfield and the Town Centre of Burntwood. As outlined by Paragraph 138 of the NPPF, where it is necessary to release Green Belt land, first consideration should be given to land that "has been previously-developed and/or is well served by public transport". Given there is minimal brownfield land available, we, therefore, should turn to sustainable settlements such as Whittington, which is well served by services and facilities.</p>	<p>exception circumstances exist. It will not be the role of the Green Belt Review to determine whether exceptional circumstances do or do not exist. The District Council will be updating the urban capacity assessment which will form a separate piece of evidence.</p> <p>Comments noted. The Settlement Sustainability Study is a separate piece of the evidence base underpinning the Local Plan.</p> <p>Comments noted.</p> <p>Where professional judgement is applied, as is set out within the methodology, it will be explained</p>	<p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

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	<p>Methodology We are generally supportive of the methodology set out within the Method Statement which assesses each of the parcels against the purposes of the Green Belt. However, as mentioned above Lichfield District Council have acknowledged that releasing land from the Green Belt is necessary in order to meet its housing requirement. As such, there seems little point in assessing each parcel against purpose e) of NPPF paragraph 134, as all Green Belt sites by their nature will score the same against this criteria. The 7 stage approach outlined by the 'Proposed Review Methodology' seems appropriate and reflective of a study of this nature.</p> <p>Whilst it is acknowledged that there are instances where 'professional judgement' will be required as outlined in paragraph 2.9, further clarification is required as to how making 'professional judgement' can be moderated, otherwise it may result in subjective decisions being made, which could prejudice the validity of the assessment. It is assumed that 'professional judgement' will be made in the context of the requirements of the NPPF, however there should be a clear protocol and review process in place in the interests of consistency.</p> <p>Stage 1: Context & Background to Review It is acknowledged that the background and context is useful in setting the policy and historical context of the Green Belt surrounding Lichfield District. However, much of the background relating to the District-wide Local Plan from the 1990's and beforehand, does not seem relevant to the current review and there should be more emphasis on the current and emerging issues relating to the unmet housing need emanating within the GBHMA and the housing requirement for Whittington.</p> <p>Stage 2: Defining the Study Area We have no issue with the Green Belt Review covering all of the Green Belt within Lichfield District, which is appropriate given Lichfield's limited urban capacity, housing requirement, and since approximately half of the District's administrative area is Green Belt.</p> <p>Stage 3: Identification of Land Parcels</p>	<p>within the individual site assessment.</p> <p>Comments noted. It is considered appropriate to provide the historical context of the Green Belt as this assists in understanding the current context.</p> <p>Comments noted.</p> <p>Comments noted. Given the extent of Green Belt within the District it is considered appropriate and proportionate to use smaller parcels and broad areas for the purposes of the assessment.</p>	<p>Historical context of the Green Belt – it is considered important to review the historic context of the Green Belt in order to understand its original aim and purpose in the context of Lichfield. This assists in defining the terminology.</p> <p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>We support the identification of smaller assessment parcels around key settlements in the District. The Sheepwash Farm, Whittington site is located within proposed Green Belt Parcel 'W6' (Figure D.14 of Appendix D). It is our view that parcel 'W6' presents the best site to accommodate the future growth of Whittington.</p> <p>Whilst it does not affect the Land at Sheepwash Farm, Whittington, there is some concern over the assessment of 'broad areas'. Given the scale of some of the broad area assessment parcels, it is difficult to accurately assess them based on the five purposes of the Green Belt. For instance, some smaller land parcels within the broad assessment parcel may perform poorly against the five purposes, whilst the broad area parcel as a whole may perform well, or vice versa. We therefore think that this should be taken into consideration when undertaking the assessment and smaller parcels should be identified within the broad area assessment parcels and assessed separately if they clearly perform differently against the five purposes of the Green Belt compared to the parcel as a whole.</p> <p>When considering the role individual parcels play in the Green Belt, it should also be noted that the entirety of the parcel may not be suitable for development, however, it could be suitable for compatible Green Belt uses, such as Public Open Space, or Woodland for example.</p> <p>We agree with the approach of Table 1: Boundary Definition which accords with Paragraph 139 of the NPPF, which states that when defining boundaries local planning authorities should. 'f) Define boundaries clearly using physical features that are readily recognisable and likely to be permanent'. This is an important consideration when revising Green Belt boundaries and sites with clearly defensible boundaries, such as at Sheepwash Farm, Whittington should be prioritised over those without defined boundaries and which could contribute to unrestricted sprawl into the countryside. Parcel W6 has clear defensible boundaries and is bounded by 'durable features' with the railway line to the north, Whittington Brook and Sheepwash Farm to the east, Fisherwick Road to the south and Whittington to the West. In addition, the</p>	<p>Comments noted. The final section of the assessment form allows for an opportunity to consider this.</p> <p>Comments noted.</p> <p>Comments noted. The assessment approach is based on good practice. The approach proposed is considered to be proportionate and appropriate. Should finer grain assessment be considered appropriate then this will be undertaken following this Green Belt Review.</p>	<p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>parcel is located on the eastern side of Whittington, and subsequently will not contribute to coalescence with Lichfield to the west.</p> <p>Stage 4: Defining the Assessment Approach</p> <p>We are generally supportive of the assessment approach, which assesses each parcel against the five purposes of the Green Belt, although as mentioned we question the necessity of assessing each parcel against point e) given they will all be scored the same against this criteria.</p> <p>We have some concern over the assessment categories outlined in Paragraph 2.91. Whilst it is acknowledged that the NPPF does not consider that any one purpose of the Green Belt is more important than another, the proposed scoring system may result in sites that perform substantially different against the five purposes of the Green Belt, falling within the same categorisation. By considering the combined assessment of all purposes, it is possible to obtain an indication of those areas that may make a greater contribution. For instance, if there is a 3 / 2 score split and the '2' categories are 'important', it does not seem appropriate that the overall assessment should be 'important'. This approach would result in sites that have 2 'important' and 3 'minor' scores falling within the same category as sites with 5 'important' scores. It is our view that the categorisation should be reviewed to ensure that, for example, sites with 5 'important' scores are differentiated from those which scored just 2 'important' scores, through the addition of appropriate categories, caveats or sub-categories.</p> <p>Furthermore, we consider the overall approach to the Green Belt assessment to be constraints led, and as such, the benefits of bringing specific sites forward could be overlooked. The purpose of the review is to determine where suitable Green Belt land can be released, to address the Districts housing shortfall. The release of Green Belt land for housing, is a way of managing growth and, therefore, should be proactive and take into consideration any benefits that may be provided by a development site in addition to constraints. The assessment should provide further commentary on the benefits of each parcel and determine the validity of the assessment parcel as a whole, or in part. Should</p>	<p>Comments noted. The purpose of the Green Belt Review is to assess parcels/areas against the purposes of the Green Belt.</p> <p>Comments noted. Notification of the consultation was sent to all registered users on the Council's consultation database.</p> <p>Comments noted. It is considered appropriate to include a section within the document which provides</p>	<p>Overall assessment – It is not possible for a parcel to have 5 'important' scores as purpose 5 has a blanket assessment of 'moderate'. Whilst it is correct that there is no differentiation between parcels with 4 'important' scores and 2 'important' scores, they are both still being given the highest score. In Arup's experience, very few parcels end up having 4 'important' scores, partly because purpose 1 only applies to the defined 'large built up area'. Adding further new categories to the overall assessment would confuse matters.</p> <p>Scope and purpose of the Review - A Green Belt Review is not intended to determine land to be released. It is intended to be an objective, evidence-based assessments of how the Green Belt contributes to the five purposes set out</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>the parcel not be suitable for development in the short term, the assessment should consider the opportunity of safeguarding land for future development.</p> <p>Stage 5a: Method Statement Consultation We have no comments on this approach.</p> <p>Stage 5b: Wider stakeholder method statement consultation (Current Stage) We have no comments on this approach, although we do consider that the website should be updated more regularly so that it clearly states when the next consultation will take place. As it stands, we are only made aware that the consultation process is open by an email to a registered person linking to the consultation portal, which for numerous reasons, such as absence or otherwise, could be easily overlooked.</p> <p>Stage 6: Undertake Detailed Site Assessments Whilst we agree that the assessment of smaller parcels and broad areas is for the most part an appropriate approach, as mentioned above, there may be smaller parcels within broad assessment parcels that perform differently to the wider assessment parcel against the five purposes of the Green Belt. This may only become apparent once the desk-based assessment and site visit is undertaken, so there should be an opportunity for Officers to revise the assessment parcels prior to them being 'finalised' should they think there is merit to assess an individual site separately from the broad area assessment parcel.</p> <p>Stage 7: Publication of Final Report We are concerned about the inclusion of an 'Overall conclusions and Recommendations' chapter of the final report. Conclusions should have already been reached regarding each sites Green Belt role in the 'Conclusions of each site assessment' chapter. The additional chapter seems unnecessary. We trust you take our comments into consideration and we would welcome the opportunity to participate in future rounds of consultation on the emerging Local Plan and its supporting evidence base.</p>	<p>overall conclusions and recommendations.</p>	<p>in national policy. Should the Council consider it necessary to release Green Belt land, the Review will inform decision making on this and an exceptional circumstances case would need to be made. The Review would be considered alongside other Local Plan evidence as part of a site selection process.</p>
GB25: Pegasus Group on	<p>The Green Belt Review Method Statement sets out that the purpose of the Green Belt Review is to provide an independent, comprehensive and</p>	<p>Comments noted.</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
behalf of Bloor Homes	<p>transparent assessment of the Green Belt within Lichfield District for the purposes of planmaking'.</p> <p>In summary, Bloor Homes submits that:</p> <ul style="list-style-type: none"> • The current local plan strategy focuses the majority of growth to the most sustainable locations in the District. It must be recognised that the most sustainable settlements within the District, including Lichfield and Burntwood, are constrained by Green Belt. The majority of the sites needed to meet the District's future development needs in a sustainable manner will therefore fall within land currently designated as Green Belt. The weight to be attached to the outcome of the Green Belt Review outcomes should be proportionate to the conclusions contained within other evidence, including that of the Sustainability Appraisal, recognising that sustainability is not the servant of Green Belt designation. • Bloor Homes supports the Council's assertion that the Strategic Green Belt Review (2012), Supplementary Report (2013) and the LPS Supplementary Green Belt Report (2016) will inform the current Review. The conclusions of the previous studies are relevant considerations. • The approach of broadly dividing Green Belt land into two categories; 'smaller parcels' and 'broad areas' is supported, as this follows examples of good practice. However, the Review should also specifically consider the sites that are being promoted for development, due to the significant variation in performance against the purposes of the Green Belt which can be present at the 'site' level; • In looking to define Green Belt boundaries for specific sites, it is considered appropriate for the Council to use existing physical features. However, it is also important to recognise that defensible Green Belt boundaries may evolve through the master planning of 		

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>strategic sites, or that sites may have scope for the provision of new enduring physical Green Belt Boundaries.</p> <ul style="list-style-type: none"> In considering the release of sites from the Green Belt, it is considered important to recognise the additional positive benefits that may be brought about through the allocation of the site for development, such as enhanced public access, opportunities for outdoor sport and recreation, or the retention and enhancement of landscapes. Therefore, the inclusion of these benefits within the area assessment form is supported to ensure these factors should be taken into account in the overall assessment of the contribution of the site to the Green Belt; and With regard to the purposes of the Green Belt, 'coalescence' is not just a consideration of reduction in distance between settlements. This arithmetic approach fails to take into consideration other factors, such as topography, that would inform any assessment of coalescence. <p>Introduction Pegasus Group is instructed by Bloor Homes to make representations to the Lichfield District Green Belt Review Method Statement that is currently subject to consultation. Bloor Homes welcomes the opportunity to make observations and comment in respect of the proposed approach to be taken by Lichfield District Council and is supportive of the proactive approach being taken in consulting on the methodology at this early stage. Bloor Homes has current land interests within the District. The Green Belt Review Method Statement proposes several consecutive stages of assessing land parcels within the Green Belt and it is considered that these stages are logical, these being:</p> <ul style="list-style-type: none"> Stage 1: Context & Background to Review; Stage 2: Defining the Study Area; 	<p>Comments noted.</p> <p>Comments noted. The existing Green Belt evidence base formed part of the evidence base supporting the current local plan. This Green Belt Review will be a comprehensive review and will inform future plan-making.</p> <p>Comments noted. The Strategic Growth Study forms part of the</p>	<p>No further comments.</p> <p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<ul style="list-style-type: none"> • Stage 3: Identification of Land Parcels; • Stage 4: Designing the Assessment Approach; • Stage 5a: Method Statement Consultation; • Stage 5b: Method Statement Consultation (wider stakeholder consultation) (this stage); • Stage 6: Undertake Detail Site Assessments; and • Stage 7: Publication of Final Report. <p>This representation provides comment in line with the staged approach set out above.</p> <p>Stage 1: Context & Background to Review</p> <p>It noted that the Green Belt Review, once completed, will form an element of the evidence base to inform the 'plan-making' function. It is recognised that this element of the evidence will sit alongside other important technical evidence necessary to influence the spatial strategy, strategic policies and other policies and allocations that will comprise the Local Plan.</p> <p>Stage 1 of the Method Statement highlights that a significant amount of work has already been carried out in respect of assessing land parcels designated as Green Belt against the five key purposes set out within the NPPF (paragraph 134). Bloor Homes supports the Council's assertion that the Strategic Green Belt Review (2012), Supplementary Report (2013) and the LPS Supplementary Green Belt Report (2016) will inform the current Review. This work informed the current adopted Local Plan Strategy and the Local Plan Allocations document due to be adopted in July 2019, which removes land from the Green Belt to the south of Lichfield and land associated with the former St. Matthews psychiatric hospital, however, it is also considered relevant to the current review process and in light of further development needs and pressures experienced within the District. This evidence has been tested at Examination in Public and assisted in the demonstration of exceptional circumstances to amend Green Belt boundaries within the District.</p>	evidence base supporting the Local Plan. The Green Belt review within the Strategic Growth Study provides a high level review across this housing market area. This provides context for the review which will be undertaken within Lichfield District.	No further comments.

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	<p>Whilst the Method Statement makes reference to the Strategic Growth Study, published in 2018, it is considered that the Strategic Green Belt Review contained within it is too high level to provide any meaningful conclusions that would override the conclusions of local assessment. It is noted that the Strategic Green Belt Review contained within the GBHMA Strategic Growth Study takes a very high-level approach and has assisted in identifying the potential areas of search put forward within the Strategic Growth Study. It does however stress the need for local Green Belt reviews to allow the identifications of smaller urban extensions (less than 2,500 dwellings) along with a strategic approach to find locations for identifying possible locations for much larger urban extensions or new settlements.</p> <p>Stage 2: Defining the Study Area</p> <p>Stage 2 seeks to establish the geographic extent of the Green Belt study area. The Methodology Statement recognises that the Green Belt covers approximately half of the District's administrative area, extending from the south western corner of the District where it adjoins the Birmingham conurbation to the West Coast Mainline that bisects the District. Figure 2 highlights the extent of Green Belt as an artificial policy constraint to development, enveloping a significant number of the most sustainable settlements within the District, including those with the strongest functional relationship with the Major Urban Area where cross-boundary housing shortfalls are evidenced. The sustainable settlements enveloped by the Green Belt include:</p> <ul style="list-style-type: none"> • Burntwood • Fazeley/Mile Oak/Bonehill • Shenstone • Whittington • Little Aston • Hopwas 	Comments noted.	<p>No further comments.</p> <p>Identification of Broad Areas – Arup agrees that further explanation is required as to how the broad areas have been defined as they do not</p>

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	<p>In addition, Lichfield City and Armitage with Handsacre are significantly constrained by Green Belt.</p> <p>Bloor Homes support the Council's decision to exclude land within the Area of Outstanding Natural Beauty (AONB) from the Study Area. It would have been helpful to include this designation within Figure 2 for clarity.</p> <p>Stage 3: Identification of Land Parcels</p> <p>The approach of broadly dividing Green Belt land into two categories; 'smaller parcels' and 'broad areas' is supported, as this follows examples of good practice. However, it is unclear from the Method Statement exactly how the 'broad areas' have been defined, for although para.2.64 states that the same approach of using the most recognisable durable features (road, operational railways and water bodies) as for 'smaller parcels' has been employed, by the very nature of a broad area it will contain a number of such features, and no detailed explanation of how these have been selected is included within the methodology.</p> <p>It is also of concern that the parcels have been selected prior to consulting on the methodology with the wider development industry.</p> <p>Whilst the need to identify 'broad' and 'smaller' parcels for the purpose of assessment is necessary, it should be recognised that site-specific proposals are unlikely to reflect the parcels proposed. It is therefore essential that further, finer grained site-specific Green Belt assessments are undertaken, if necessary, to inform the site selection process. The Council should commit to undertaking site specific assessment as a further stage in the Green Belt Review methodology to ensure a robust approach to site selection as an integral element of the plan making process.</p> <p>This was a matter considered recently at the South Staffordshire Site Allocations Document examination where the Inspector concluded "it is perhaps unfortunate that a finer-grained assessment of the contribution of the smaller allocated sites, rather than the larger land parcels, to the purposes of the Green Belt was not undertaken." Indeed, applying professional judgement to proposals within a 'smaller' parcel was an approach taken by Lichfield District</p>	<p>Comments noted. Paragraph 2.64 of the method statement is clear that the approach used to define broad areas is consistent with that of defining small parcels. It also states that given the nature of broad areas the most durable features will be used when defining parcels.</p> <p>Comments noted. The purpose of the method statement consultation was to allow for stakeholders views on the proposed methodology including the parcels which have been identified. Where it is considered parcel/areas should be modified for the purpose of the assessment this will be undertaken. Do not consider that the representation does not provide justification as to why the identified parcels/areas should be changed.</p>	<p>include all roads boundaries. They also don't solely include 'A' roads. Arup has often undertaken an exercise to merge broad areas which have similar characteristics in order to reduce numbers down to a manageable amount in the interests of efficiency and proportionality. If the Council has undertaken such an exercise to reach the current broad areas, Arup recommends that this is explained and detailed in the Method Statement.</p> <p>Parcels/Sites – It is important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the</p>

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	<p>Council previously in considering the Deans Slade Farm proposal in the Supplementary Green Belt Report published in December 2013.</p> <p>In looking to define Green Belt boundaries for specific sites it is considered appropriate for the Council to use readily recognisable physical features, which have a degree of permanency. However, it is also important to recognise that defensible Green Belt boundaries may evolve through the master planning of strategic sites.</p> <p>In light of the above, it is considered that it will be necessary to focus on a more detailed Green Belt review of specific sites, once a spatial strategy and alternatives have been developed, informed by other evidence and consultation.</p> <p>Stage 4: Designing the Assessment Approach</p> <p>The assessment approach proposed is described as a 'more nuanced' approach to that undertaken in the previous Lichfield District Green Belt Review. However, Bloor Homes wish to raise a number of concerns with the methodology and highlight where further clarity is necessary.</p> <p>Firstly, the methodology only appears to relate to the assessment against the five purposes for including land within the Green Belt as set out in the NPPF. The methodology therefore fails to set out the methodology to be deployed in assessing parcels against the two 'local roles' established within the Supplementary Review 2013 and referred to in paragraph 2.73. Whilst paragraph 2.86 states that Arup recommend that these roles are incorporated into the NPPF Green Belt purposes for clarity and completeness, the Methodology Statement fails to confirm this is the case and, if so, how these have been incorporated through the assessment methodology, particularly in the role of 'maintaining the local settlement hierarchy and pattern.'</p> <p>Secondly, in respect of the 'first purpose' it is not clear whether the neighbouring towns of Rugeley and Tamworth as considered 'large built-up areas.' Both Rugeley and Tamworth are constrained by Green Belt in a similar manner to Lichfield City, with all three settlements lying to the north eastern extent of the West Midlands Green Belt. Further clarification is therefore sought.</p>	<p>Comments noted. The approach proposed is considered to be proportionate and appropriate. Should finer grain assessment be considered appropriate then this will be undertaken following this Green Belt Review.</p> <p>Comments noted. Consider the approach detailed within the methodology is based on good practice, specifically that used by Arup in a number of Green Belt Reviews. The approach allows for a more nuanced assessment which is considered appropriate.</p> <p>Comments noted, consider the local roles have been incorporated into the assessment criteria set out at the assessment form.</p>	<p>whole of the Green Belt to be assessed against the purposes and the Council can utilise the outcomes from the review for strategic decision making. Submitted sites often have different boundaries to parcels and therefore it is important that a separate assessment is made.</p> <p>Local Roles – Arup recommends that paragraph 2.73 includes a footnote next to the words 'local roles' to explain that these are not being assessed separately but have been subsumed within the five purposes as otherwise this paragraph may appear confusing. Further explanation on how they have been subsumed could be included as the comment requests.</p>

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	<p>Thirdly, concerns are raised in respect of the ‘nuanced’ rules in determining a parcel/areas overall assessment. The Council’s previous Green Belt evidence provided a clear outcome for each parcel determined by the highest category assessed for any of the Green Belt purposes. This provided a clear, objective assessment for each parcel. However, the proposed approach to apply a number of rules appears far from clear. In addition, the application of these rules is likely to result in no clear assessment; instead resulting in the need to ‘apply professional judgement.’ The application of professional judgement is clearly open to interpretation and may result in conclusions that are not objective, consistent or clear. For example, will the professional judgement be undertaken by the same individual? Will any weighting be applied to the assessment questions identified in the assessment form?</p> <p>Finally, rules set out in the Methodology Statement reflect those contained within the Arup Critical Friend Review included at Appendix E. The Critical Friend Review states that the rules are intended to ‘cover all possible scenarios’ however this does not appear to be the case. For example, where there is a 2/2/1 split, the rules only determine the outcome where the minority category is ‘important’ or ‘no’. For example, it is not clear what the outcome would be if the minority category were to be ‘minor’ or ‘moderate’:</p> <table border="0" data-bbox="403 917 1254 997"> <tr> <td>Minor</td> <td>Minor</td> <td>Moderate</td> <td>Important</td> <td>Important</td> <td>?</td> </tr> <tr> <td>No</td> <td>No</td> <td>Minor</td> <td>Moderate</td> <td>Moderate</td> <td>?</td> </tr> </table> <p>Further clarification is therefore required to ensure that all possible scenarios are covered within the Methodology Statement.</p> <p>Detailed comments in respect of the assessment criteria and identified definitions are set out below:</p> <p>First Purpose</p> <p>As highlighted above, it is not clear whether the neighbouring towns of Rugeley and Tamworth are to be considered ‘large built-up areas.’ The definitions set out at paragraph 2.74 make no reference to these settlements.</p>	Minor	Minor	Moderate	Important	Important	?	No	No	Minor	Moderate	Moderate	?	<p>Large-built up areas are defined within the methodology under the explanation to the first purpose. It will be made clear that this also refers to Rugeley and Tamworth.</p> <p>Comments noted. Consider the approach detailed within the methodology is based on good practice, specifically that used by Arup in a number of Green Belt Reviews. The approach allows for a more nuanced assessment which is considered appropriate.</p> <p>Comments noted.</p>	<p>Purpose 1 – Arup agrees that it should be noted that the large built up area also includes Rugeley and Tamworth. Cannock Chase Green Belt Review includes Rugeley as a large built up area.</p> <p>Overall assessment – One of the exceptions should be that if there are two ‘important’, the overall will always be ‘important’. (This is also stated when there are two ‘important and three of another category). Arup recommends this is added to the Method Statement. The examples in the Method Statement do show what the outcome is if the minority category is ‘minor’ or ‘moderate’ – in both instances it is minor.</p>
Minor	Minor	Moderate	Important	Important	?										
No	No	Minor	Moderate	Moderate	?										

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	<p>The definition of sprawl at paragraph 2.74 makes reference to 'no open separation' however this is considered to relate more closely to coalescence i.e. the second purpose.</p> <p>Second Purpose</p> <p>The definition of 'neighbouring towns' at paragraph 2.76 makes reference to 'all towns and villages' being considered settlements within the assessment. It is noted that the wording of Purpose 2 (NPPF paragraph 134) refers to preventing "neighbouring towns" merging into one another. The Methodology proposes that for assessment purposes, all settlements are to be defined as towns. Bloor Homes disagree with this approach. Although there is no definition of "town" in national planning guidance, "town" and "villages" are clearly treated differently within the settlement hierarchy contained within the adopted Local Plan and generally distinguished as two distinct forms of settlement in national and local planning policy terms. A strict interpretation of paragraph 134 should therefore mean that the primary objective is to assess the implications of the merging of towns rather than other smaller settlements that may exist within the Green Belt.</p> <p>If the District Council continues to include villages, for clarity, it is necessary to be explicit as to which settlements e.g. all settlements listed within the current settlement hierarchy as set out in the adopted Local Plan Strategy. In addition, and for the avoidance of doubt it should be clarified whether villages without defined settlement boundaries are considered settlements within the assessment.</p> <p>In respect of how each category could be awarded, as set out in the example area assessment form, the reference to distance between settlements appears arbitrary. This arithmetic approach fails to take into consideration other factors, such as topography, that would inform any assessment of coalescence.</p> <p>Third Purpose</p> <p>It is considered that all Green Belt acts to safeguard the countryside from encroachment, making this purpose difficult to use to distinguish the contribution of different areas. However, a useful approach is considered to be</p>	<p>Large-built up areas are defined within the methodology under the explanation to the first purpose. It will be made clear that this also refers to Rugeley and Tamworth.</p> <p>Comments noted. Consider the definition is appropriate and based upon good practice.</p> <p>Comments noted. Approach is considered appropriate and also is intended to integrate the previous local role of maintaining local settlement pattern within the assessment of the second purpose.</p> <p>Comments noted. The individual site assessments will make clear which settlements are being referred to (where necessary).</p> <p>The 'scale-rule' approach is only one criteria of the assessment. Details including topography will be recorded and considered.</p> <p>Comments noted.</p>	<p>As above comment</p> <p>Purpose 2 – Arup recommends that it should be made explicit that only inset settlements will be considered, not washed over villages.</p> <p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

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	<p>and enhancement of landscapes. Therefore, the inclusion of these benefits within the area assessment form is supported to ensure these factors should be taken into account in the overall assessment of the contribution of the site to the Green Belt.</p> <p>Stages 5a and 5b: Method Statement Consultations Regarding Stage 5A, the use of a 'critical friend' on the Green Belt Review and the methodology is welcomed. In respect of Stage 5B, as this is the current stage of the process no comments are made.</p> <p>Stages 6 and 7: Detailed Site Assessments and Final Report Stages 6 and 7 within the methodology both refer to 'site assessments', however the assessment methodology relates to 'broad' and 'smaller' parcels. The methodology should be therefore be reworded where necessary to refer to 'undertaking detailed parcel assessments' to avoid any confusion. As set out previously, detailed site assessments aligned to submitted proposals should be undertaken at a further stage in the review process to inform the site selection process. This is necessary to ensure the evidence which informs the site selection process is robust. Stage 7 should therefore provide an explanation as to how sites being promoted for allocation will then be assessed within the context of the broader areas within which they sit. The weight to be attached to the outcome of the Green Belt Review outcomes should be proportionate to the conclusions contained within other evidence, including that of the Sustainability Appraisal, recognising that sustainability is not the servant of Green Belt designation.</p>	<p>Comments noted. The Green belt Review will refer to parcels/areas rather than sites. This will be changed to ensure consistency and clarity.</p> <p>Comments noted. If it is considered necessary or appropriate detailed assessments of elements of parcels/areas will be undertaken at a later stage.</p>	<p>No further comments.</p> <p>No further comments.</p>
<p>GB26: Harris Lamb on behalf of</p>	<p>Representations on behalf of Barratt Homes./David Wilson Homes</p> <ul style="list-style-type: none"> • Land North of Plantation Lane/Bonehill Road • Land at Bonehill Park 		

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	<p>David Wilson homes would welcome the opportunity to discuss these development opportunities with Officers further as part of the plan preparation process.</p> <p>The consultation document helpfully sets out a seven stage process towards the preparation of the Green Belt Review. The Green Belt Review has been progressed to stage 5b. We set out below our comments in relation to each stage of the consultation document and proposed approach moving ahead.</p> <p>Stage 1 – Context and Background Review</p> <p>The context and background summary of the evolution of the extent of the Green Belt contained within the study is extremely helpful. It confirms the way in which the Green Belt has been formulated through previous Local Plan reviews. It should, however, be noted that previous Green Belt reviews were undertaken in the context of the national Green Belt policy and the development requirements and policy aspirations of Structure Plans and former Regional Spatial Strategy policies that were in place at that time. Whilst it is useful to consider what has happened in the past this should not be used to shape future reviews of the Green Belt.</p> <p>The findings of the previous Green Belt Review documents were, at least in part, influenced by the planning policy context at that time. For example, the Strategic Green Belt Review 2012's conclusions are specifically informed by the fact there was no need for strategic Green Belt land release in and around Lichfield City or Burntwood to meet the housing requirement that existed at that time due to the availability of urban capacity (paragraph 2.43). As such, the conclusions of earlier Green Belt studies must be treated with a degree of caution.</p> <p>In addition, the most recent Local Plan Preferred Options consultation document explored a range of different development options to distribute the emerging housing requirement. However, this was done in the context that the quantum of development that Lichfield District will need to accommodate to help the unmet needs of Birmingham was not known. Once the total combined housing requirement is known this is likely to influence the distribution strategy. It is, therefore, our view that the current Green Belt Review should</p>	<p>Comments noted.</p> <p>Comments noted. The Local Plan Review will consider the issue of 'safeguarded land' if considered appropriate.</p> <p>Comments noted. The Green belt Review will form part of the evidence base which will inform the local plan review.</p>	<p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

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	<p>not be influenced by previous or potential development distribution options. Instead each parcel of land included in the assessment should be assessed on an equal basis and it is for the wider Local Plan process to establish the most suitable and sustainable form of development distribution using the Green Belt Review as one of the evidence base documents.</p> <p>In addition, and significantly, the study should acknowledge the fact that the adopted Local Plan Part 1 and emerging Local Plan Part 2 do not identify safeguarded land. That being the case, the replacement Local Plan is unable to call upon areas of land that have been removed from the Green Belt and reserved for potential future development. As such, the emerging Local Plan is unable to draw on safeguarded sites and the Green Belt Review will be one of the principal documents identifying the opportunities for urban extensions adjacent to those settlements that are within the Green Belt.</p> <p>It is our view that the Green Belt Review should be used to help inform the emerging Local Plan in identifying both residential and commercial allocations and also safeguarded land beyond the Plan period that can be called upon in future reviews of the Local Plan for allocation if required.</p> <p>We support the acknowledgement that the findings of The Greater Birmingham Housing Market Area Strategic Growth Study, published in 2018, are relevant insofar as it identifies 'potential areas of search' for Green Belt land release. The study identifies strategic growth areas as principally being to the north-west of Tamworth, around Shenstone and, amongst other areas, in the vicinity of Aldridge.</p> <p>It should, however, be acknowledged that the Spatial Growth Study assesses significant Green Belt parcels extending to hundreds of hectares in size. Smaller scale developments, which are defined in paragraph 1.59 of the Strategic Housing and Land study as between 500 to 2,500 dwellings in aggregate, will need to be identified and assessed through individual Local Plan review processes. In short, the Strategic Growth Study does not consider development parcels that fall below the 2,500 dwelling threshold in any detail; and, quite rightly, this is left to the local level. We would suggest that in Lichfield District it is entirely appropriate for small urban extension</p>	<p>Comments noted.</p> <p>Comments noted. Parcels/areas have been identified using the approach set out within the methodology. In this case the durable feature used is not consistent with a promoted sites boundary.</p> <p>Comments noted.</p>	<p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

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	<p>development opportunities that are significantly smaller in scale than 2,500 units to be explored, given the size and nature of the settlements within Lichfield District and the fact that the emerging plan could seek to adopt a dispersed development option that looked in more detail at second tier settlements.</p> <p>Stage 2 – Defining the Study Area We support the proposal that the Green Belt review should examine all of the Green Belt within Lichfield District. There should be no pre-conception within the Green Belt study as to where development will be directed by the Local Plan Review. The distribution strategy is a Local Plan issue and the distribution options should be considered having regard to a range of evidence base documents including Green Belt review, SHLAA and Landscape and Visual Impact Assessments as well as the benefits of allocating individual sites.</p> <p>Stage 3 – Identification of Land Parcels We support the general approach adopted by the Green Belt Review whereby both broad areas and smaller parcels will be assessed through the study. However, it should be ensured that the small parcels correlate with land that is being either considered or promoted for development. As detailed in the latter part of these representations David Wilson Homes are in the process of promoting various sites for allocation in the emerging Local Plan that form part of Green Belt Review parcels. We support the Council in its efforts to ensure that the conclusions of the Green Belt Review are robust and properly reflect the within Green Belt development opportunities that exist, but all these potential areas must be correctly included. Ensuring that the assessment parcels have suitably drawn boundaries, at this stage, will ensure that the emerging Local Plan is based upon sound evidence with regard to the role Green Belt will have to play in providing potential development sites.</p> <p>In addition, it should be noted that the entirety of any parcel may not be subject to development. For example, in certain circumstances only a relatively small proportion of the site may be proposed for built development with significant areas of public open space or retained woodland or other green features being kept or strengthened. The assessment process should, therefore, include a brief</p>	<p>Comments noted. The Green Belt Review will provide an assessment of parcels/areas against the purposes of Green Belt.</p>	<p>No further comments.</p>

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	<p>commentary on each assessment parcel and it might be valid to conclude that whilst part of any parcel plays a limited Green Belt role there may be other parts that fulfil a more valuable role as Green Belt.</p> <p>In terms of Table 1 - Boundary Definition, we support the general approach. The Framework makes it clear that clear defensible boundaries are a key consideration in determining if it is appropriate to remove land from the Green Belt. The various features identified in Table 1 and their categorisation are generally supported. This should, however, be used as a guide and how defensible each site's boundaries are should be considered on a site by site basis having regard to the specific boundaries that exist.</p> <p>For example, in certain instances field boundaries can be well formed and will clearly demark the extent of an area and have clear permanence. On other occasions field boundaries will be poor and less distinct. That being the case, the Green Belt Review should be flexible in this regard.</p> <p>We support the recommendation that amongst the small settlements and hamlets located within the Green Belt, Stonnall should be considered appropriate for assessment through the Green Belt Review. Stonnall does not make an important contribution to the open character and openness of the Green Belt generally. That being the case, in accordance with the guidance of paragraph 139 of the Framework, Stonnall should be removed from the Green Belt and land adjacent to Stonnall should be assessed through the Green Belt Review in order to establish if it is appropriate to remove land from the Green Belt and allocate it for development.</p> <p>Stage 4 – Designing the Assessment Approach</p> <p>We support the general approach of assessing each development parcel against the five purposes of Green Belt land identified by the Framework. We are, however, concerned regarding the definitions used.</p> <p>Purpose 1</p> <p>In terms of the definition for 'sprawl' it is advised that a 'specific' consideration is that the large built-up area could become physically joined to other areas by an outward spread with no open separation between settlements. It is not clear how this differs to purpose '2', preventing neighbouring towns</p>	<p>Comments noted. Consider the definitions used within the methodology are appropriate based on good practice. Purpose 1</p>	<p>Purpose 1 - Arup agrees that the definition of sprawl at paragraph 2.74 should not include consideration of merging as this is covered in purpose 2. There appears to be double counting with purpose 2 due to consideration of coalescence. Arup</p>

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	<p>merging into one another. We are concerned that the application of this test as defined could in fact duplicate the requirements of test '2' and the same site could be penalised twice for one reason.</p> <p>It is our view that the sprawl is more of a morphology issue. It is specifically intended "to check the unrestricted sprawl of large built-up areas". Clearly any development in the Green Belt will result in a degree of sprawl. The proper assessment of 'sprawl' should be whether releasing a particular area of Green Belt could result in uncontrolled development.</p> <p>Purpose 2 It is purpose 2 which seeks to prevent neighbouring 'towns' merging. It is our view that it is inappropriate for the Council to apply this test to all 'settlements'. The guidance in the Framework is specific that this test relates to 'towns' as opposed to villages and hamlets. In certain circumstances it may be appropriate for towns to extend outwards towards smaller villages and hamlets where there could be a degree of perceived merger. The guidance in the Framework does not seek to prevent this happening in appropriate circumstances.</p> <p>Purpose 5 It is agreed that all parcels should be scored to be the same in terms of purpose 5, assisting in urban regeneration by encouraging recycling of derelict and other open land. If a Local Authority are able to identify urban brownfield sites that require redevelopment these would automatically be sequentially preferable locations for development than Green Belt sites. Green Belt land release should only be permitted if there are no suitable, sustainable and deliverable sites outside of the Green Belt. In Lichfield District this is not the case and it is generally acknowledged that Green Belt land release will be required.</p> <p>The 'local roles' of the Green Belt</p>	<p>relates specifically to the defined large build-up area defined by the methodology whereas purpose 2 relates to a wider number of settlements.</p> <p>Comments noted. The approach is considered to represent good practice, in particular the approach advocated by Arup.</p> <p>Comments noted.</p> <p>Comments noted. The local roles were included in the existing Green Belt evidence within the district.</p>	<p>recommends that the questions and categories for purpose 1 are refocused to consider sprawl only, for example the moderate and important categories refer to 'coalescence' which will be considered as part of purpose 2.</p> <p>Purpose 2 – It is commonplace for Councils to include all settlements including inset villages in their assessment of purpose 2. The Greater Birmingham HMA Strategic Green Belt Review, the Cannock Chase Green Belt Review and Tamworth Green Belt Review all use this same approach.</p> <p>No further comments.</p>

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	<p>We are concerned with the application of the 'local roles' identified by the assessment. The first 'local role' is maintaining the existing settlement hierarchy and pattern. This is not a Green Belt matter. This is a matter for consideration in the development of a growth distribution strategy in the Local Plan Review. The Green Belt Review should be undertaken by assessing the merits of each parcel of land as an area of Green Belt drawing upon the purposes of Green Belt as defined by the Framework and the wider Green Belt Framework guidance generally.</p> <p>Turning to the second local role of 'preserving the character and settling of villages', again, this is not a Green Belt matter. It is clearly a consideration through the identification of development sites, however, this falls outside of Green Belt assessment criteria.</p> <p>We do, however, agree that the Green Belt assessment should consider each site in terms of the positive uses Green Belts can serve as identified by paragraph 141 of the Framework. It is also our view that the Green Belt assessment should identify whether clear and defensible Green Belt boundaries exist. The Framework confirms at paragraph 139 that when defining Green Belt boundaries plans should, amongst other things, define Green Belt boundaries using physical features that are readily recognisable and likely to be permanent. As part of the assessment process the Green Belt Review should, therefore, examine which parcels of land are able to achieve this requirement.</p> <p>Assessment Categories</p> <p>We broadly support the use of the identified assessment categories. The assessment should, however, acknowledge that given the nature of the identified parcels different parts of each parcel may have different levels of importance. Where this is the case it should be confirmed by the assessment.</p> <p>Overall Assessment</p> <p>We have some concern over the assessment categories outlined in paragraph 2.91. Whilst it is acknowledged that the NPPF does not consider that any one purpose of the Green Belt is more important than another, the proposed scoring system may result in parcels that perform substantially differently against the five purposes, falling within the same categorisation. By considering the</p>	<p>Following advice from Arup and the good practice review it was considered appropriate to subsume the local roles into the five purposes of Green Belt. The use of these local roles allows for local distinctiveness to be taken account within the assessment.</p>	<p>No further comments.</p> <p>Overall assessment – It is not possible for a parcel to have 5 'important' scores as purpose 5 has a blanket assessment of 'moderate'. Whilst it is correct that there is no differentiation</p>

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	<p>combined assessment of all purposes, it is possible to obtain an indication of those areas that may make a greater contribution. For instance, if there is a 3 / 2 score split and the '2' categories are 'important', it does not seem appropriate that the overall assessment should be 'important'. This approach would result in sites that have 2 'important' and 3 'minor' scores falling within the same category as sites with 5 'important' scores. It is our view that the categorisation should be reviewed to ensure that , for example, sites with 5 'important' scores are differentiated from those which scored just 2 'important' scores, through the addition of appropriate categories, caveats or sub-categories.</p> <p>Stage 6 – Undertaking the Detailed Site Assessments</p> <p>We generally support the approach identified under Stage 6. However, in undertaking the assessment regard should be given to the extent of the development proposed within each assessment parcel. For example, if representations have been submitted to the Call for Sites consultation that indicates a development parcel is brought forward for a combination of built development and public open space/green infrastructure the location and general extent of the proposed built development and areas of public open space/green infrastructure should be considered as part of the Green Belt assessment. This will ensure that the Green Belt Review properly considers the impact that the release of each parcel of land and its potential allocation for development could have on the Green Belt.</p> <p>Similarly, it is suggested, as part of Stage 6, that it is important to consider whether the development of a particular parcel/area could lead to the danger of subsequent coalescence in the future. This is not a necessary consideration. This is a matter for review in future versions of the Local Plan and Green Belt assessment.</p> <p>We generally support the use of the additional assessment criteria identified at page 37 of the consultation document. These are, however, site specific and should be considered alongside the detailed Call for Sites representations submitted in respect of each site. For example, if a Call for Sites representation is provided indicating that public open space and/or sports recreation facilities will be provided as part of the developable site this is a consideration in terms</p>	<p>Comments noted. The scoring system is based upon good practice, specifically the approach advocated by Arup.</p> <p>Comments noted. The purpose of the Green Belt Review is to assess parcels/areas against the purpose of Green Belt. Detail suggested through site promotion is not to be considered through this assessment.</p>	<p>between parcels with 4 'important' scores and 2 'important' scores, they are both still being given the highest score. In Arup's experience, very few parcels end up having 4 'important' scores, partly because purpose 1 only applies to the defined 'large built up area'. Adding further new categories to the overall assessment would confuse matters.</p> <p>Parcels/Sites – It is important to differentiate between parcels and sites. Arup recommends that submitted sites are assessed separately at a later stage of the preparation of the Local Plan Review, should Green Belt release be considered necessary. The current broad area/parcel approach enables the whole of the Green Belt to be assessed against the purposes and the Council</p>

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	<p>of additional assessment criteria 2- opportunities for outdoor sports and recreation.</p> <p>Appendix D – Green Belt Parcels As referred to above, it is our view that the Green Belt assessment parcels should accurately reflect the extent of the land that is likely to be promoted for development. In this regard we have the following comments.</p> <p>D.4 – Fazeley, Mile Oak and Bonehill – Land South of Bonehill Road This is a parcel of land located between Bonehill Road and the A5, as shown on Plan 1 attached in Appendix A. This area of land is not currently included as a ‘smaller parcel’ on site plan D.4. As such the Green Belt Review will not properly assess the role the site plays in the Green Belt. An additional assessment parcel should be identified in respect of the site. Turning to the assessment criteria, the site performed well.</p> <p>D.4- Fazeley, Mile Oak and Bonehill- Land North of Bonehill Road The land at Bonehill Farm should also be identified as a specific development parcel and assessed through the Green Belt Review. The extent of the site is identified by the plan at Appendix 2. The site performs well against the Green Belt assessment criteria.</p> <p>D.7 Lichfield- Sandways Farm We support the inclusion of parcel L.8 within the Green Belt review.</p> <p>D.10- Shenstone – Land to the east of Shenstone We support the inclusion of parcels S.7 and S.8 within the Green belt review.</p> <p>D.12 – Stonnall We support the principle of including the parcel ST.4 within the Green Belt review. However, we believe the true extent of the parcel is larger than currently shown. A true reflection of the definable extent of the parcel is shown in the plan attached at Appendix 5. This is an example of a parcel where parts might have a lower performance against the 5 Green Belt purposes, and part might be higher performing. It is trusted that these representations will prove useful in the formulation of the final Green Belt Review document.</p>	<p>Comments noted. Parcels/areas have been identified using the approach set out within the methodology. The approach has been applied consistently.</p> <p>Comments noted. Parcels/areas have been identified using the approach set out within the methodology. The approach has been applied consistently.</p>	<p>can utilise the outcomes from the review for strategic decision making. Submitted sites often have different boundaries to parcels and therefore it is important that a separate assessment is made.</p> <p>No further comments.</p> <p>No further comments.</p>

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GB27: Pegasus Group on behalf of Richborough Estates	<p>Introduction</p> <p>Pegasus Group is instructed by Richborough Estates to make representations to the Lichfield District Green Belt Review Method Statement that is currently subject to consultation.</p> <p>Richborough Estates welcomes the opportunity to make observations and comment in respect of the proposed approach to be taken by Lichfield District Council and is supportive of the proactive approach being taken in consulting on the methodology at this early stage.</p> <p>Richborough Estates has current land interests within the District. This Green Belt Review Method Statement sets out the approach proposed by LDC for undertaking the required Green Belt Review, including the detailed methodology and the parcels of land which have been identified to be assessed. The Method Statement has also sought to set out the context within which the review is being undertaken and highlight the work which has already been completed. It seeks to provide a comprehensive and objective assessment of the Green Belt within Lichfield District. The final Green Belt Review will form evidence for the Local Plan Review, and for neighbourhood plans where relevant, forming part of the necessary evidence and justification for any required alterations to Green Belt boundaries.</p> <p>The Green Belt Review Method Statement sets out that the purpose of the Green Belt Review is to provide an independent, comprehensive and transparent assessment of the Green Belt within Lichfield District for the purposes of 'planmaking'. It also acknowledges that the Local Plan Review is being advanced, in part, to consider unmet housing need arising from the Greater Birmingham Housing Market Area (GBHMA). This shortfall is significant.</p> <p>It is noted that this consultation document focuses on the methodology and does not suggest any alterations to the existing Green Belt boundaries, but</p>		<p>Same comments raised as per Bloor Homes consultation response therefore the same Arup responses apply here.</p>

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	<p>rather it defines the study area, the identification of land parcels and defines an assessment approach as to how the identified 'broad areas' and 'smaller parcels' will be assessed as to how they perform against the identified purposes that Green Belt land should serve, as set out within National Planning Policy guidance. The next stages are set out as including the detailed assessment of sites against the defined methodology, and the production of a final report, with overall conclusions and recommendations.</p> <p>Given its location, the District is an attractive place for people to live. It has been a significant destination for migrants from the West Midlands conurbation and other nearby towns. This has led to pressure for housing growth over and above the needs arising purely from within the district. The southern half of the district is covered by the West Midlands Green Belt.</p> <p>The current local plan strategy focuses the majority of growth to the most sustainable locations in the District. It must be recognised that the most sustainable settlements within the District, including Lichfield and Burntwood, are constrained by Green Belt. Therefore, it follows that the majority of the sites needed to meet the District's future development needs in a sustainable manner will fall within land currently designated as Green Belt. It is noted that the Preferred Options & Policy Directions consultation document highlighted that growth options could necessitate consideration of Green Belt boundaries. Richborough Estates welcomes this opportunity to comment on the Green Belt Review Methodology and would welcome further positive dialogue with Lichfield District Council and the local community in respect of the emerging Local Plan Review and the Green Belt Review.</p> <p>The Green Belt Review Method Statement proposes several consecutive stages of assessing land parcels within the Green Belt and it is considered that these stages are logical, these being:</p> <ul style="list-style-type: none"> • Stage 1: Context & Background to Review; • Stage 2: Defining the Study Area; • Stage 3: Identification of Land Parcels; • Stage 4: Designing the Assessment Approach; 	<p>Comments noted.</p> <p>Comments noted. The existing Green Belt evidence base formed part of the evidence base supporting the current local plan. This Green Belt Review will be a comprehensive review and will inform future plan-making.</p>	

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	<ul style="list-style-type: none"> • Stage 5a: Method Statement Consultation; • Stage 5b: Method Statement Consultation (wider stakeholder consultation) (this stage); • Stage 6: Undertake Detail Site Assessments; and • Stage 7: Publication of Final Report. <p>This representation provides comment in line with the staged approach set out above.</p> <p>Stage 1: Context & Background to Review</p> <p>It noted that the Green Belt Review, once completed, will form an element of the evidence base to inform the 'plan-making' function. It is recognised that this element of the evidence will sit alongside other important technical evidence necessary to influence the spatial strategy, strategic policies and other policies and allocations that will comprise the Local Plan.</p> <p>Stage 1 of the Method Statement highlights that a significant amount of work has already been carried out in respect of assessing land parcels designated as Green Belt against the five key purposes set out within the NPPF (paragraph 134). Bloor Homes supports the Council's assertion that the Strategic Green Belt Review (2012), Supplementary Report (2013) and the LPS Supplementary Green Belt Report (2016) will inform the current Review. This work informed the current adopted Local Plan Strategy and the Local Plan Allocations document due to be adopted in July 2019, which removes land from the Green Belt to the south of Lichfield and land associated with the former St. Matthews psychiatric hospital, however, it is also considered relevant to the current review process and in light of further development needs and pressures experienced within the District. This evidence has been tested at Examination in Public and assisted in the demonstration of exceptional circumstances to amend Green Belt boundaries within the District.</p> <p>Whilst the Method Statement makes reference to the Strategic Growth Study, published in 2018, it is considered that the Strategic Green Belt Review contained within it is too high level to provide any meaningful conclusions that</p>	<p>Comments noted. The Strategic Growth Study forms part of the evidence base supporting the Local Plan. The Green Belt review within the Strategic Growth Study provides a high level review across this housing market area. This provides context for the review which will be undertaken within Lichfield District.</p> <p>Comments noted.</p>	

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	<p>would override the conclusions of local assessment. It is noted that the Strategic Green Belt Review contained within the GBHMA Strategic Growth Study takes a very high-level approach and has assisted in identifying the potential areas of search put forward within the Strategic Growth Study. It does however stress the need for local Green Belt reviews to allow the identifications of smaller urban extensions (less than 2,500 dwellings) along with a strategic approach to find locations for identifying possible locations for much larger urban extensions or new settlements.</p> <p>Stage 2: Defining the Study Area</p> <p>Stage 2 seeks to establish the geographic extent of the Green Belt study area. The Methodology Statement recognises that the Green Belt covers approximately half of the District's administrative area, extending from the south western corner of the District where it adjoins the Birmingham conurbation to the West Coast Mainline that bisects the District.</p> <p>Figure 2 highlights the extent of Green Belt as an artificial policy constraint to development, enveloping a significant number of the most sustainable settlements within the District, including those with the strongest functional relationship with the Major Urban Area where cross-boundary housing shortfalls are evidenced. The sustainable settlements enveloped by the Green Belt include:</p> <ul style="list-style-type: none"> • Burntwood • Fazeley/Mile Oak/Bonehill • Shenstone • Whittington • Little Aston • Hopwas <p>In addition, Lichfield City and Armitage with Handsacre are significantly constrained by Green Belt.</p>		

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	<p>Richborough Estates support the Council's decision to exclude land within the Area of Outstanding Natural Beauty (AONB) from the Study Area. It would have been helpful to include this designation within Figure 2 for clarity.</p> <p>Stage 3: Identification of Land Parcels</p> <p>The approach of broadly dividing Green Belt land into two categories; 'smaller parcels' and 'broad areas' is supported, as this follows examples of good practice. However, it is unclear from the Method Statement exactly how the 'broad areas' have been defined, for although para.2.64 states that the same approach of using the most recognisable durable features (road, operational railways and water bodies) as for 'smaller parcels' has been employed, by the very nature of a broad area it will contain a number of such features, and no detailed explanation of how these have been selected is included within the methodology.</p> <p>It is also of concern that the parcels have been selected prior to consulting on the methodology with the wider development industry.</p> <p>Whilst the need to identify 'broad' and 'smaller' parcels for the purpose of assessment is necessary, it should be recognised that site-specific proposals are unlikely to reflect the parcels proposed. It is therefore essential that further, finer grained site-specific Green Belt assessments are undertaken, if necessary, to inform the site selection process. The Council should commit to undertaking site specific assessment as a further stage in the Green Belt Review methodology to ensure a robust approach to site selection as an integral element of the plan making process.</p> <p>This was a matter considered recently at the South Staffordshire Site Allocations Document examination where the Inspector concluded "it is perhaps unfortunate that a finer-grained assessment of the contribution of the smaller allocated sites, rather than the larger land parcels, to the purposes of the Green Belt was not undertaken." Indeed, applying professional judgement to proposals within a 'smaller' parcel was an approach taken by Lichfield District Council previously in considering the Deans Slade Farm proposal in the Supplementary Green Belt Report published in December 2013.</p>	<p>Comments noted. Paragraph 2.64 of the method statement is clear that the approach used to define broad areas is consistent with that of defining small parcels. It also states that given the nature of broad areas the most durable features will be used when defining parcels.</p> <p>Comments noted. The purpose of the method statement consultation was to allow for stakeholders views on the proposed methodology including the parcels which have been identified. Where it is considered parcel/areas should be modified for the purpose of the assessment this will be undertaken. Do not consider that the representation does not provide justification as to why the identified parcels/areas should be changed.</p> <p>Comments noted. The approach proposed is considered to be proportionate and appropriate. Should finer grain assessment be considered appropriate then this will be undertaken following this Green Belt Review.</p>	

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	<p>In looking to define Green Belt boundaries for specific sites it is considered appropriate for the Council to use readily recognisable physical features, which have a degree of permanency. However, it is also important to recognise that defensible Green Belt boundaries may evolve through the master planning of strategic sites.</p> <p>In light of the above, it is considered that it will be necessary to focus on a more detailed Green Belt review of specific sites, once a spatial strategy and alternatives have been developed, informed by other evidence and consultation.</p> <p>Stage 4: Designing the Assessment Approach</p> <p>The assessment approach proposed is described as a 'more nuanced' approach to that undertaken in the previous Lichfield District Green Belt Review. However, Bloor Homes wish to raise a number of concerns with the methodology and highlight where further clarity is necessary.</p> <p>Firstly, the methodology only appears to relate to the assessment against the five purposes for including land within the Green Belt as set out in the NPPF. The methodology therefore fails to set out the methodology to be deployed in assessing parcels against the two 'local roles' established within the Supplementary Review 2013 and referred to in paragraph 2.73. Whilst paragraph 2.86 states that Arup recommend that these roles are incorporated into the NPPF Green Belt purposes for clarity and completeness, the Methodology Statement fails to confirm this is the case and, if so, how these have been incorporated through the assessment methodology, particularly in the role of 'maintaining the local settlement hierarchy and pattern.'</p> <p>Secondly, in respect of the 'first purpose' it is not clear whether the neighbouring towns of Rugeley and Tamworth as considered 'large built-up areas.' Both Rugeley and Tamworth are constrained by Green Belt in a similar manner to Lichfield City, with all three settlements lying to the north eastern extent of the West Midlands Green Belt. Further clarification is therefore sought.</p> <p>Thirdly, concerns are raised in respect of the 'nuanced' rules in determining a parcel/areas overall assessment. The Council's previous Green Belt evidence provided a clear outcome for each parcel determined by the highest category</p>	<p>Comments noted. Consider the approach detailed within the methodology is based on good practice, specifically that used by Arup in a number of Green Belt Reviews. The approach allows for a more nuanced assessment which is considered appropriate.</p> <p>Comments noted, consider the local roles have been incorporated into the assessment criteria set out at the assessment form.</p> <p>Large-built up areas are defined within the methodology under the explanation to the first purpose. It will be made clear that this also refers to Rugeley and Tamworth.</p>	

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	<p>assessed for any of the Green Belt purposes. This provided a clear, objective assessment for each parcel. However, the proposed approach to apply a number of rules appears far from clear. In addition, the application of these rules is likely to result in no clear assessment; instead resulting in the need to 'apply professional judgement.' The application of professional judgement is clearly open to interpretation and may result in conclusions that are not objective, consistent or clear. For example, will the professional judgement be undertaken by the same individual? Will any weighting be applied to the assessment questions identified in the assessment form?</p> <p>Finally, rules set out in the Methodology Statement reflect those contained within the Arup Critical Friend Review included at Appendix E. The Critical Friend Review states that the rules are intended to 'cover all possible scenarios' however this does not appear to be the case. For example, where there is a 2/2/1 split, the rules only determine the outcome where the minority category is 'important' or 'no'. For example, it is not clear what the outcome would be if the minority category were to be 'minor' or 'moderate':</p> <table border="1" data-bbox="405 890 1256 963"> <tr> <td>Minor</td> <td>Minor</td> <td>Moderate</td> <td>Important</td> <td>Important</td> <td>?</td> </tr> <tr> <td>No</td> <td>No</td> <td>Minor</td> <td>Moderate</td> <td>Moderate</td> <td>?</td> </tr> </table> <p>Further clarification is therefore required to ensure that all possible scenarios are covered within the Methodology Statement.</p> <p>Detailed comments in respect of the assessment criteria and identified definitions are set out below:</p> <p>First Purpose</p> <p>As highlighted above, it is not clear whether the neighbouring towns of Rugeley and Tamworth are to be considered 'large built-up areas.' The definitions set out at paragraph 2.74 make no reference to these settlements. The definition of sprawl at paragraph 2.74 makes reference to 'no open separation' however this is considered to relate more closely to coalescence i.e. the second purpose.</p>	Minor	Minor	Moderate	Important	Important	?	No	No	Minor	Moderate	Moderate	?	<p>Comments noted. Consider the approach detailed within the methodology is based on good practice, specifically that used by Arup in a number of Green Belt Reviews. The approach allows for a more nuanced assessment which is considered appropriate.</p> <p>Comments noted.</p> <p>Large-built up areas are defined within the methodology under the explanation to the first purpose. It will be made clear that this also refers to Rugeley and Tamworth.</p> <p>Comments noted. Consider the definition is appropriate and based upon good practice.</p>	
Minor	Minor	Moderate	Important	Important	?										
No	No	Minor	Moderate	Moderate	?										

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	<p>Second Purpose</p> <p>The definition of 'neighbouring towns' at paragraph 2.76 makes reference to 'all towns and villages' being considered settlements within the assessment. It is noted that the wording of Purpose 2 (NPPF paragraph 134) refers to preventing "neighbouring towns" merging into one another. The Methodology proposes that for assessment purposes, all settlements are to be defined as towns. Bloor Homes disagree with this approach. Although there is no definition of "town" in national planning guidance, "town" and "villages" are clearly treated differently within the settlement hierarchy contained within the adopted Local Plan and generally distinguished as two distinct forms of settlement in national and local planning policy terms. A strict interpretation of paragraph 134 should therefore mean that the primary objective is to assess the implications of the merging of towns rather than other smaller settlements that may exist within the Green Belt.</p> <p>If the District Council continues to include villages, for clarity, it is necessary to be explicit as to which settlements e.g. all settlements listed within the current settlement hierarchy as set out in the adopted Local Plan Strategy. In addition, and for the avoidance of doubt it should be clarified whether villages without defined settlement boundaries are considered settlements within the assessment.</p> <p>In respect of how each category could be awarded, as set out in the example area assessment form, the reference to distance between settlements appears arbitrary. This arithmetic approach fails to take into consideration other factors, such as topography, that would inform any assessment of coalescence.</p> <p>Third Purpose</p> <p>It is considered that all Green Belt acts to safeguard the countryside from encroachment, making this purpose difficult to use to distinguish the contribution of different areas. However, a useful approach is considered to be one which distinguishes between urban fringe areas and open countryside, and that this should be reflected in the specific questions for this purpose.</p> <p>Fourth Purpose</p>	<p>Comments noted. Approach is considered appropriate and also is intended to integrate the previous local role of maintaining local settlement pattern within the assessment of the second purpose.</p> <p>Comments noted. The individual site assessments will make clear which settlements are being referred to (where necessary).</p> <p>The 'scale-rule' approach is only one criteria of the assessment. Details including topography will be recorded and considered.</p> <p>Comments noted.</p> <p>Comments noted.</p>	

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	<p>This purpose relates to the setting and special character of 'historic towns' and therefore the definition should not include the villages of Shenstone, Hopwas, Fazeley/Mile Oak/Bonehill, Drayton Bassett, Whittington and Little Aston. Whilst the setting and special character of these 'villages' were identified as playing a local role in previous Green Belt Reviews in the District, it is not justified for these settlements to influence the assessment against this purpose: this would result in the assessment being inconsistent with national guidance. Therefore, the definition should be refined to restrict consideration against this purpose to Lichfield City, Tamworth, Rugeley and Cannock.</p> <p>Fifth Purpose</p> <p>It is recognised that all Green Belt parcels would play the same role in assisting with urban regeneration by encouraging the recycling of derelict and other urban land. This is evidenced by the fact that there is a lack of brownfield sites within the District.</p> <p>However, as all parcels would be deemed to result in a 'moderate' outcome through the application of the proposed methodology, this may result in an unintended consequence of altering the overall outcome of a parcel through the application of the 'nuanced' assessment methodology. It is concerning therefore that the application of a consistent value against this purpose could have an effect of distorting outcomes. An alternative approach would be to omit an assessment against this purpose and refine the assessment criteria accordingly. This is an approach taken by other LPAs within the wider Housing Market Area, including Bromsgrove and indeed the Green Belt Review contained within the Strategic Growth Study.</p> <p>Positive Benefits</p> <p>In considering the release of sites from the Green Belt it is considered important to recognise the additional positive benefits that may be brought about through the allocation of the site for development, such as enhanced public access, opportunities for outdoor sport and recreation, or the retention and enhancement of landscapes. Therefore, the inclusion of these benefits within the area assessment form is supported to ensure these factors should be</p>	<p>Comments noted.</p> <p>Comments noted. The Green belt Review will refer to parcels/areas rather than sites. This will be changed to ensure consistency and clarity.</p> <p>Comments noted. If it is considered necessary or appropriate detailed assessments of elements of parcels/areas will be undertaken at a later stage.</p>	

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	<p>taken into account in the overall assessment of the contribution of the site to the Green Belt.</p> <p>Stages 6 and 7: Detailed Site Assessments and Final Report Stages 6 and 7 within the methodology both refer to 'site assessments', however the assessment methodology relates to 'broad' and 'smaller' parcels. The methodology should be therefore be reworded where necessary to refer to 'undertaking detailed parcel assessments' to avoid any confusion.</p> <p>As set out previously, detailed site assessments aligned to submitted proposals should be undertaken at a further stage in the review process to inform the site selection process. This is necessary to ensure the evidence which informs the site selection process is robust.</p> <p>Stage 7 should therefore provide an explanation as to how sites being promoted for allocation will then be assessed within the context of the broader areas within which they sit.</p>		
<p>GB28: Pegasus Group on behalf of Smith Brothers Farms</p>	<p>This letter provides Smith Brothers Farms (SBF) representations in response to the consultation on the Green Belt Review Method Statement (June 2019). SBF are the freehold owners of land off Slade Road, Bassetts Pole and are promoting their land as a potential strategic employment allocation. SBF firmly believe that their site (see Appendix 1) would provide an excellent location to meet the regional/sub-regional needs for industrial and storage and distribution uses.</p> <p>In terms of our response to the consultation, we have sought to follow and refer to the general chapter headings, sub-headings and paragraph numbers contained within the consultation document so that it is clear to which our response relates. Our comments are as follows:</p> <p><u>Methodology</u> Existing Green Belt Evidence We note that the Council intend to draw on existing work carried out within Lichfield District. Whilst we have no objection to this evidence being used as a general approach to the Review process, we are concerned that this evidence is focused mainly on housing, rather than employment. Further work will be required to establish employment needs, and particularly explore options for</p>	<p>The site noted by the representation is not excluded from the Green Belt Review. If falls within one of the identified broad areas which will be assessed. The methodology sets out the approach used to identify parcels/areas.</p> <p>Comments noted. The purpose of the Green Belt Review is to assess</p>	<p>No further comments.</p>

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	<p>meeting the unmet employment needs of Tamworth and Birmingham and the demands of the employment market generally. For these reasons the existing evidence base - predicated on previous housing strategies – can not be relied upon to inform the method for considering changes to the Green Belt to meet potential employment needs.</p> <p>Stage 3: Identification of Land Parcels</p> <p>In general, we support the Council’s approach of identifying ‘smaller parcels’ as well as ‘broad areas’ as part of the Green Belt Review. It should however be recognised that site specific proposals - put forward by developments/landowners for instance - are unlikely to reflect the parcels proposed for assessment. It is therefore essential that further, finer grained site-specific Green Belt assessments are undertaken to inform the site selection process, using for example, sites put forward within the Employment Land Availability Assessment (ELAA). The Council should therefore commit to undertaking a more refined site-specific assessment as an additional stage in the Green Belt Review methodology to ensure a robust approach to site selection as it does not appear that Stage 6 will take into account sites put forward by developers/landowners.</p> <p>At paragraph 2.63 of the Methodology it states that the Green Belt Review will include “identification of smaller parcels be extended to settlements in neighbouring authorities which abut the Lichfield Green Belt”. Although some sites have been identified on the edge of Little Aston, few other ‘smaller parcels’ have been identified to meet cross boundary needs. The Green Belt Review should be prepared on the basis of meeting housing and employment needs of neighbouring authorities and sites identified to assist with this purpose.</p> <p>With regards to the ‘Broad Areas’ identified in Figure 3, it is not clear how these have been chosen from the Methodology. Table 1 explains how the smaller parcels are to be identified, and the approach outlined here seems reasonable and logical. Paragraph 2.64 states that the same criteria have been used to identify the broad parcels, but clearly the larger areas contain many of the features referred in Table 1 (including roads and railway lines etc) but does</p>	<p>parcels/areas against the purposes of the Green Belt. This does not relate to potential uses of land, rather it provides an objective assessment in terms of the purposes of Green Belt.</p> <p>Comments noted.</p> <p>Comments noted. Parcels/areas have been identified using the approach set out within the methodology. The approach has been applied consistently.</p> <p>Comments noted. Paragraph 2.64 of the method statement is clear that the approach used to define broad areas is consistent with that of defining small parcels. It also states that given the nature of broad areas the most durable features will be used when defining parcels.</p>	<p>No further comments.</p> <p>No further comments.</p> <p>Identification of Broad Areas – Arup agrees that further explanation is required as to how the broad areas have been defined as they do not include all roads boundaries. They also don’t solely include ‘A’ roads. Arup has often undertaken an exercise to merge broad areas which have similar characteristics in order to reduce numbers down to a manageable amount in the interests of efficiency and proportionality. If the</p>

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	<p>not explain how the broad parcel were ultimately selected. It would be useful if the Council could explain how and why the broad parcels were chosen as some are particularly extensive, and cross various features that would generally be considered defensible features. For example, we note that land off Slade Road, Bassetts Pole falls within Broad Area BA10. This parcel covers a substantial area, extending from the A38 to the west to the eastern edge of Lichfield District's administrative area to the east. Within this area there are numerous features that could provide defensible boundaries, such as the A453 and A4091. Further detail on how the broad areas have been identified would be required for clarity.</p> <p>Stage 4: Designing the Assessment Approach</p> <p>We agree that any parcels identified will need to be assessed against the purposes of the Green Belt as outlined in the NPPF (paragraph 134) and we do not wish to raise concerns regarding the approach to the overall assessment at this stage.</p> <p>It does however appear that the review methodology is focusing solely on locations on the edge of settlements, which would suggest that the scope of the Review has been predetermined. An entirely 'policy off' approach should be carried out when reviewing the Green Belt at this stage. Once the Local Plan Review is at a more advanced stage, with housing and employment growth needs better understood, then more detailed site-specific assessment will be necessary to identify sites that can accommodate the scale growth required. The strategic performance of these sites/parcels can then be reassessed having regard to the tests out at paragraph 134 of the NPPF.</p> <p>In terms of other issues, we note at paragraph 2.81 of the Review Methodology that any settlement with historic features, whether they comprise local or national designations, will be defined as a 'historic town' for the purposes of the Green Belt Review. This is a highly unusual approach. Paragraph 134(d) refers specifically to historic towns and a literal meaning should be taken from this i.e. only towns with historic interest should be considered against paragraph 134(d) rather than villages, which include heritage assets.</p>	<p>Comments noted. The approach proposed within the methodology is based upon best practice. The Green belt Review will be a comprehensive assessment and assesses all areas of the Green Belt within the District using a robust and proportionate approach.</p> <p>Comments noted. Approach is considered to be appropriate and based on good practice. No changes to methodology recommended as a result of response.</p>	<p>Council has undertaken such an exercise to reach the current broad areas, Arup recommends that this is explained and detailed in the Method Statement.</p> <p>No further comments.</p>

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	<p>We have welcomed the opportunity to comment on the Green Belt Review Methodology and we hope that the Council will consider our comments in progressing to the next stage of the Review process and we look forward to receiving the Council's comprehensive response to this consultation in due course.</p>		
<p>GB29: Burntwood Town Council</p>	<p>Burntwood Town Council response to the Green Belt Review with comments from the Council being in bold text.</p> <p>There is concern that there is insufficient recognition of Burntwood as a significant local town with its own identity and character and the size of the town in terms of the number of residents needs to be factored into any decision to review the Green Belt boundaries. Burntwood suffers from a chronic lack of investment in its infrastructure and as such expansion of the size of the town through widening its borders has the potential to cause significant detriment to the quality of life residents and could impact negatively on local businesses. The National Planning Policy Framework (NPPF) makes it clear that there should not be changes to the established boundaries of the Green Belt except in exceptional circumstances. At the current time Burntwood Town Council (BTC) can see no justification, nor has any been presented, that would demonstrate the existence of exceptional circumstances enough to justify any adjustment to the current boundaries.</p> <p>1.2</p> <p><i>The Local Plan Review is being advanced, in part, to consider established unmet housing need arising from within the Greater Birmingham Housing Market Area (GBHMA). The Local Plan Strategy (LPS) and Local Plan Allocations (ADPD) documents acknowledge that, following discussions under the Duty to Cooperate (DtC), that evidence has emerged that indicates that Birmingham is not able to accommodate its housing requirement within its own administrative boundaries, and that a similar situation applied to Tamworth, albeit on a much lesser scale. The LPS makes reference to the ongoing work within the wider GBHMA which is seeking to address these issues and states</i></p>	<p>Comments noted. The purpose of the Green Belt Review is to provide an assessment of parcels/areas against the purposes of the Green Belt as established within national policy. Issues such as infrastructure and population size are not part of the national purposes of the Green Belt. These are issues which are considered in other elements of the evidence base supporting the Local Plan. The Green Belt Review is only one piece of the evidence base.</p>	<p>No further comments.</p>

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	<p><i>that "In the event that the work identifies that further provision is needed in Lichfield District, an early review or partial review of the Lichfield District Local Plan will be brought forward to address this matter. Should the matter result in a small scale and more localised issue directly in relation to Tamworth then this will be dealt with through the Local Plan Allocations document".</i></p> <p>It needs to be clear if Housing development that is not part of a significant development is included in the numbers for the Local Plan Allocations. Whilst it seems likely that it is the case, it needs to be explicitly stated that small scale developments that increase the number of houses in Burntwood are included in the number of additional houses that are being provided towards the allocation by the Town.</p> <p>The National Planning Policy framework makes it clear that the extent of the Green Belt is already well established and should only be changed in response to planning large scale developments. BTC do not see the need locally, for any significant further development outside of the town boundaries. Indeed, there are a number of sites within the town boundaries that have already been identified as suitable sites for the building of housing, many of which have remained unused and in some cases derelict for many years. These areas are not seen as being as attractive to developers as they come with additional costs to bring the land into usage through decontamination and demolition costs. Consequently, BTC are aware that a number of developers have been scoping out areas of Green Belt for potential release as residential building land. It is imperative to the long-term sustainability and wellbeing of Burntwood's residents that these areas of Green Belt land are not released just to provide additional profits to development organisations with no intrinsic presence or interest in Burntwood over and above the ability of the town to turn them a profit.</p> <p>2.16</p>	<p>Comments noted. All developments are included within the housing figures which meet the local plan housing requirements. However, this is not a matter considered within the Green Belt Review. The purpose of the Green Belt Review is to provide an assessment of parcels/areas against the purposes of the Green Belt as established within national policy.</p> <p>Comments noted.</p> <p>Comments noted. The purpose of the Green Belt Review is to provide an assessment of parcels/areas against the purposes of the Green Belt as established within national policy. Issues such as infrastructure and population size are not part of the</p>	<p>No further comments.</p> <p>No further comments.</p>

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	<p><i>Paragraph 139 of the NPPF states that when defining Green Belt boundaries local planning authorities should:</i></p> <p style="padding-left: 40px;">a) <i>Ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;</i></p> <p>Sustainability is currently the biggest concern for BTC with regards to any potential to remove areas from the Green Belt and make them available for development. It is widely felt that there are a number of significant sustainability issues throughout Burntwood with a lack of a well designed and maintained Town Centre, significant parking issues, lack of health care facilities, limited public transport services, social and community meeting places, poorly maintained highways and pavements. BTC fail to see firstly how any removal of land from the Green Belt will bring any benefits or resolutions to these issues. Continuing to increase the size of the town by adding additional housing estates on the peripheries will not assist in developing the available areas already identified within the town boundaries which can be developed as part of a more coherent, long term and sustainable planning agenda where additional housing is provided within the town's existing boundaries along with the facilities necessary to provide for local residents. It is felt that there should be explicit consideration to the impact of removing areas from the Green Belt, which essentially is only done to make it available for development, and the longer-term impact of that development on the sustainability of the community as a whole.</p> <p><i>1.9 In July 2012 Lichfield District Council published a <u>Strategic Green Belt Review</u> as evidence for the preparation of the LPS. The Strategic Review considers the Green Belt within Lichfield District as a whole and made a number of recommendations for further Green Belt work. This included recommendation as to the settlements where it may be appropriate to consider minor amendments to the Green Belt and the potential need for safeguarded land for long term needs, particularly to serve Lichfield City. The review also</i></p>	<p>national purposes of the Green Belt. These are issues which are considered in other elements of the evidence base supporting the Local Plan. The Green Belt Review is only one piece of the evidence base.</p> <p>Comments noted. The Local Plan Strategy stated that the St Matthews area would be removed from the Green Belt with the precise boundaries to be defined by the Local Plan Allocations document. The Local Plan Allocations document defines this boundary, which is continuous with the built area of the estate. The new Green Belt Review is being progressed in support of the Local Plan Review document.</p>	<p>No further comments.</p>

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	<p><i>identified a number of 'washed over' villages where 'infill' boundaries should be considered.</i></p> <p>BTC note the recent removal of the St Matthews housing estate from the Green Belt. This is of significant concern as it appears to geographically justify the potential for infill along the Coulter Lane area which has been under constant threat for many years. Several justifications were given for this which included such things as facilitating easier planning applications for residents wishing to make improvements to their properties. There is a danger that infill opportunities would allow areas of Green Belt between areas such as Chorley and Woodhouses to end up contiguous with Burntwood. This is a significant risk to the loss of the identity and amenity of these areas and the removal of the St Matthews estate from the Green Belt appears to have served no practical purpose. BTC would go so far as to say that the only people who will have noticed this is the Developers who are interested in the infill opportunities it now presents. We would urge a rethink of this decision and emphasise that as much consideration should be given to putting areas into the Green Belt as is given to taking them out. This review should not be just about parcels of land but about the impact of development on the community and sustainable development of the large built up areas.</p> <p><i>2.19</i></p> <p><i>Current guidance within the NPPF is clear that the Green Belt is a strategic planning tool which primarily seeks to prevent the spread of development into the countryside and the coalescence of urban areas. However, the Framework is clear that the Green Belt boundaries will need to be considered within local authority areas through the 'plan making' process.</i></p> <p>The interpretation of this is a cause for concern as it relies upon the definition of an Urban area that is used. Whilst Burntwood is arguably not urban, it is bordered by the large West Midlands Conurbation and as such is in significant danger of amalgamation into that urban area. The Green</p>	<p>Comments noted. The methodology defines the term large built-up areas for the purposes of the Green Belt Review. This includes both Burntwood and Lichfield as is suggested. The issue of the spread of large built-up areas is considered under the assessment of the first purpose.</p>	<p>No further comments.</p>

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	<p>Belt review should define that the town of Burntwood and the City of Lichfield, which have similar populations even if not the infrastructure and investment to match, should be viewed as built up areas in need of protection from urban sprawl and coalescence. The close proximity of Burntwood to the West Midlands conurbation to the south and Cannock to the west means that urban sprawl has the very real potential to result in amalgamation of the town into surrounding towns and villages. Whilst geographical boundaries like Chasewater and the M6 Toll Road appear to offer some restrictions to this, these landmarks are themselves within the Green Belt and its expansion in any respective direction would make Burntwood a contiguous conurbation with Brownhills to the south Norton Canes to the west, or the villages of Gentleshaw, Cannock Wood and Chorley to the north and Hammerwich to the east. This is of concern not just to Burntwood's residents but also to these other areas. Areas of land at Bleak House and Coney Lodge offer opportunities for developers but encroach on the boundary with protected areas like Gentleshaw Common and the SSSI at Biddulph Pool. Development of these areas pose a potential detriment to important habitats just because of their close proximity and this should be included in the considerations as especially with the Bleak House area, development here could effectively amalgamate that part of Burntwood with Norton Canes, thus being the very definition of sprawl. There is concern that collaboration is needed with surrounding Councils which is not explicit in the method statement as to its importance. This is of special concern with the borders of Burntwood and Cannock Chase Council, where the boundary abuts the very edge of the western side of the town. Any decisions by Cannock Chase Council to allow development on their Green Belt will impact significantly on the above mentioned areas of Bleak House, Biddulph Pool and the land to the west of Stables Way.</p> <p>2.22 <i>A Green Belt was first proposed within the West Midlands during the 1950's. It was devised principally as a means through planning policy of preventing the</i></p>	<p>Comments noted. The historical context of the Green Belt is provided</p>	<p>No further comments.</p>

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	<p><i>outward expansion of the built up area of the West Midlands into open countryside and towards the series of freestanding towns and villages surrounding the main West Midlands urban area.</i></p> <p>This sounds as though the Green Belt is there to stop the West Midlands encroaching upon rural areas. With the proximity of Burntwood to Brownhills and Norton Canes, Hammerwich, Gentleshaw and Chorley, it is as relevant to see it as preventing Burntwood from encroaching on those areas as well. This is not only relevant to the West Midlands but to all the towns and villages in the Lichfield District.</p> <p>2.31 <i>The Local Plan Allocations document (ADPD) was prepared between 2016 and 2019 with the examination in public taking place in September 2018. The ADPD did not propose any changes to Green Belt boundaries with the exception of the removal of the St Matthews estate from the Green Belt. The detailed boundary for this change was drawn tightly around the existing built area of the estate. The ADPD is scheduled for adoption, subject to the decision of Council, in July 2019.</i></p> <p>As detailed above there are concerns around this decision and the purpose of it as it has had no measurable positive impact that can be felt by the residents there. This should be reviewed and there should be as much emphasis on adding areas to the Green Belt as there is to removing them.</p> <p>2.47 <i>The methodology identified specific parcels of the Green Belt around these settlements in order to provide a detailed assessment of how each parcel contributed to the purposes of the Green Belt as set out within the NPPF and two 'local roles'. In terms of the NPPF purposes the methodology identifies an issue facing many Green belt Reviews which is the fifth purpose "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". The report notes that few Green Belt Reviews seek to analyse this</i></p>	<p>to provide context and represents a factual historical position.</p> <p>Comments noted.</p>	<p>No further comments.</p>

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	<p><i>purpose in relation to individual parcels of Green Belt as it is commonly accepted that all Green Belt generally serves this purpose as it directs development to within existing urban areas. The Supplementary Review considers therefore that assessment against this criteria is not valid with effectively all parcels considered to play an equal role in this purposes, a similar approach to that taken with the Strategic Growth Study which acknowledges that the Green belt as a whole contributes to this purpose (paragraph 7.12). It is worth noting that the Cannock Chase Green Belt Review (2016) in essence makes the same judgement, although rather than not scoring against this purpose it scores all land parcels equally as playing a role in serving the fifth purpose.</i></p> <p>The need to compartmentalise areas of land appears to suggest that some areas may be more valuable than others and would suggest that they could be graded in terms of their suitability for potential development. This approach would be wholly unacceptable as different areas are valuable for very different reasons depending upon the topography, geography, ecology and local use of the land concerned as well as those mentioned in Appendix A. There is concern from BTC on how these parcels have been identified and what process is in use to decide where the parcel boundaries lie. It is noted that on map D.2 Burntwood, Parcels B2 and SM6 have been created in such a way as they take full advantage of the removal of St Matthews from the Green Belt. It is interesting to note the interest that developers take in these parcels of land once they have been identified and this practice appears to benefit the developers wishing to build on the Green Belt as much as it assists any other administrative purpose. The identification of parcels of Green Belt surrounding Burntwood and other areas needs to be justified and applied with absolute clarity. As a process this does not recognise that the sum of the areas identified is greater than its individually identified parts. The approach to dealing with the Green Belt should be to consider it in its entirety and not to take a piecemeal</p>	<p>Comments noted. The purpose of the Green Belt Review is to provide an assessment of parcels/areas against the purposes of the Green Belt as established within national policy. The Green Belt Review is only one part of the evidence base which will support the Local Plan.</p> <p>Comments noted. The Green Belt Review proposes to assess parcels/areas of the Green Belt defined using the methodology set out within this statement.</p>	<p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>approach. Any hierarchical grading of these parcels must be clarified in terms of what factors have been considered and how any surveys of the areas have been conducted and by whom. Appendix A details several criteria for assessment however it does not identify how the parcels of land were identified in the first place. Separating the areas into such small parcels does not necessarily consider the impact of one area of land in relation to a neighbouring one, for example where a stream travels through numerous parcels or where the runoff on one parcel of land creates a boggy wetland habitat in another. These ecological and geographical issues also need to be considered.</p> <p>BTC feel that the appointment of ARUP to act as a “Critical Friend” is a helpful step which will assist in ensuring probity and independence in the review, but we would like to see environmental and ecological considerations being more prominent in the assessment criteria.</p> <p>2.73 <i>The approach is designed to provide a simple, objective and consistent assessment of all parcels/areas. As discussed in preceding sections each assessment will consider the purposes of the Green Belt as defined within the NPPF and the two ‘local roles’ established within the Supplementary Review 2013. In terms of the NPPF purposes the following will be assessed:</i></p> <ul style="list-style-type: none"> a) <i>To check the unrestricted sprawl of large built-up areas;</i> b) <i>To prevent neighbouring towns merging into one another;</i> c) <i>To assist in safeguarding the countryside from encroachment;</i> d) <i>To preserve the setting and special character of historic towns; and</i> e) <i>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</i> 	<p>Comments noted. The purpose of the Green Belt Review is to provide an assessment of parcels/areas against the purposes of the Green Belt as established within national policy.</p> <p>The definition of ‘historic town’ included within the method statement is considered appropriate as it is based on nationally recognised designations relating to the historic environment.</p>	<p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Whilst a simple, objective and consistent assessment is to be welcomed, there is ongoing concern that ecological and environmental considerations do not appear to factor in the assessment. Of note also is the preservation of historic towns. Whilst Burntwood isn't well known for historical events, it is a long-established settlement with a history going back several hundred years. It includes many buildings that have been identified as of local importance including some that lie within the Green Belt and which are of local interest due to their character and long-established use. Country public houses such as the Nags Head and Nelson Inn for example are well known establishments that attract people to the area due to their countryside locations. The Nags head has a history as a public house going back to at least 1799 and the Nelson was in business back in 1824. Whilst they may not be of historical significance they are of historical interest and both bring business into the local area for this reason.</p> <p>2.84 <i>The fifth purpose (e) at paragraph 134 of the NPPF is considered to be more difficult to assess as it is a function of the whole green belt to assist in urban regeneration. All Green Belt makes a strategic contribution to urban regeneration by restricting the amount of greenfield land available for development and encouraging developers to utilise derelict and/or urban sites. There is limited brownfield land available within Lichfield District, as evidenced through the Council's Land Availability Assessments and Brownfield Land Register. The Strategic Growth Study demonstrates that there is a considerable supply of brownfield urban sites within the housing market area, predominantly in Birmingham and the Black Country authorities. As such it is clear that the Green Belt within Lichfield would play a moderate role in encouraging the use of derelict urban land. It is not considered possible to assess whether a particular parcel/area in isolation makes a greater contribution to this purpose than another. As such all parcels will be scored the same against this criteria.</i></p>	<p>Comments noted. Approach to the assessment of the fifth purpose is considered appropriate and based upon good practice.</p>	<p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>BTC feel that there should be a clearer interpretation of “assist urban regeneration” As already stated Burntwood is a large town with a population close to that of the nearby City of Lichfield. It is implied that the Green Belt serves only to encourage urban regeneration in the areas of Greater Birmingham and the Black Country. There are areas of under-utilised and derelict land also in Burntwood that is also in need of regeneration and this definition could be widened to include recognition of the above to ensure that brownfield sites within Burntwood are prioritised for development prior to any consideration of Green Belt destruction. The Green Belt around Burntwood should not exist purely to encourage urban development within our neighbouring urban areas but should be seen as recognition of the countryside as a natural resource and as a reason to ensure development primarily takes place on brownfield sites already within the boundaries of built up areas.</p>		
<p>GB30: Turley on behalf of Taylor Wimpey Strategic Land</p>	<p>This Position Note has been prepared in response to the Lichfield District Council Green Belt Review 2019 Method Statement, prepared by Lichfield District Council (LDC) in June 2019. This note has been prepared by The Environmental Dimension Partnership Ltd (EDP) in order:</p> <ul style="list-style-type: none"> To critique the latest iteration of Lichfield District Council Green Belt Review 2019 Method Statement, prepared by Lichfield District Council (LDC) in June 2019, following public consultation on the January 2019 Method Statement; and To apply the latest proposed method statement to the land south of Rugeley Road, Armitage, Staffordshire ('the site'). <p>Lichfield District Council will continue to consult on the Method Statement for their forthcoming Green Belt Review, with the review planned for late 2019. Taylor Wimpey Strategic Land (West Midlands) instructed EDP to review the aforementioned Method Statement, and this critique will be submitted to LDC as part of this consultation exercise.</p>	<p>Comments noted. As is set out at Stage 5a of the methodology the first consultation was a confidential consultation with duty to cooperate partners prior to the stage 5b public consultation. The agent (Turley) was sent this confidential document by a third party and was advised by LDC that the stage 5a document was confidential and not for their comment at that time.</p>	<p>No further comments.</p>

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	<p>EDP regularly advise on Green Belt matters. This includes the consideration of Green Belt studies on behalf of housebuilders, developers and strategic land investment organisations. This critique was undertaken during July 2019 by a Chartered Landscape Architect from EDP.</p> <p>This critique follows on from the previous EDP review of the Lichfield District Council Green Belt Review 2019 Method Statement, prepared by Lichfield District Council (LDC) in January 2019 (LDCGBR January 2019); see EDP document ref: edp4572_r004.</p> <p>Critique</p> <p>In response to the Lichfield District Council Green Belt Review 2019 Method Statement, prepared by Lichfield District Council (LDC) in June 2019 (LDCGBR June 2019), EDP raises the following observations.</p> <p>Good Practice</p> <p>Since the issue of the January 2019 methodology, LDC has appointed Ove Arup as an independent consultant to provide a 'Critical Friend' appraisal, and subsequent enhancements to the LDC methodology. Given EDP's review of the June 2019, and a number of adjustments, EDP is broadly supportive of the LDCGBR June 2019 Method Statement.</p> <p>Strategic Approach</p> <p>With regard to LDCGBR June 2019 Method Statement paragraph 2.60, EDP notes that LDC qualifies that the forthcoming Green Belt Review will appraise all land within the Green Belt (within the administrative authority of LDC). However, a great deal of this land area will be discarded as not being suitable for development, in order to maintain the fundamental integrity of the Green Belt.</p> <p>In a similar manner, LDC confirms that land within the Areas of Outstanding Natural Beauty (AONB) will be omitted from the review as it would not be appropriate. In its broadest sense, EDP considers this omission to be pragmatic and sensible due to the potential wider landscape and visual effects of bringing forward development within highly sensitive environments such as an AONB. For obvious reasons, this seems an appropriate acknowledgement.</p>	<p>As noted above. The Method Statement prepared in January 2019 was a confidential document as described at stage 5a of the methodology. The agent was advised of this. The District Council did not accept submission from parties beyond those consulted at stage 5a.</p> <p>Comments noted.</p> <p>Comments noted. The purpose of the Green Belt Review is to assess parcels/areas against the purposes of the Green Belt as set out in national policy.</p> <p>Comments noted.</p>	<p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

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	<p>With consideration of paragraph 2.61, and Appendix 1, Table 1 of the LDCGBR 2019 Method Statement, LDC pose a series of questions for the assessment of each Green Belt purpose. In all fairness, this inquiry led approach with a broad level of questioning is one which is appropriate in principle and is more extensive than other Local Planning Authority's Green Belt Reviews which EDP has responded to.</p> <p>With regard to paragraphs 2.52 to 2.54, LDC highlight their distinction between 'broader areas' and smaller 'land parcels' for this assessment. EDP would advocate that the definition of a 'broader area' is influenced by the landscape character areas, and smaller landscape character types commonly found within published landscape character assessments. This baseline information would be beneficial in defining the extent of these 'broader areas' at a macro scale, with the 'land parcels' defined at a micro scale through broad physical features and long established boundaries. This approach would identify the most essential Green Belt land for release, and in its absence, there is a potential that Green Belt land may be scored too generically.</p> <p>Appraisal of Local Purposes</p> <p>With consideration of the LDCGBR June 2019 methodology, LDC will assess each site against the five purposes, or functions, of the Green Belt (as set out in the current NPPF); see paragraph 2.73 of the LDCGBR June 2019. This is normal and appropriate. However, the LDCGBR June 2019 Method Statement also puts forward what might be referred to as a 'local purpose'; see Appendix A, Table 1 under the heading 'Existing or potential contribution to positive functions of the Green Belt – retaining and enhancing the beneficial use'; see page 37.</p> <p>From reading the LDCGBR June 2019, LDC do not clarify the relevance of this section. There is a lack of clarity in the Method Statement over the relevance of this assessment section, and how it will be evaluated. For instance; will this section be assessed against the five purposes of the Green Belt, or which one of the purposes? If this is assessed by LDC against one of the five Green Belt purposes and given the same weight to that of the other Green Belt purposes, there is a risk of double counting.</p>	<p>The criteria included under the heading 'Existing or potential contribution to positive functions of the Green Belt – retaining and enhancing the beneficial use' at Appendix A are considered appropriate. The methodology makes clear that this element of the form will not impact upon a parcel/areas scoring but is provided to provide additional detail.</p> <p>The Green Belt Review will assess parcels/areas against the purposes of</p>	<p>No further comments.</p> <p>No further comments.</p>

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	<p>Additionally, EDP considers, that this section of the LDCGBR 2019 should not be given the same weight, as the sub-criterion are not supported by national guidance (i.e. degree of public access, opportunities for outdoor sports and recreation, landscape and visual amenity, and enhancing bio-diversity etc). Hence, EDP considers that this local purpose and its inter-relation with the Green Belt purposes seems potentially confused. If this sub-criterion is to remain part of the LDCGBR June 2019, there should be greater clarity on why this assessment is included, and what relevance public access or a rich bio-diversity may have in respect of the five Green Belt purposes i.e. preventing coalescence and maintaining openness.</p> <p>EDP considers, that any Green Belt Assessment (within the administrative authority of LDC, or wider afield) must focus more specifically on the aim and purposes of the Green Belt, rather than including positive uses and enhancements, which are not fundamental to its designation, review or continued protection, and are not fundamental in the retention of openness in the Green Belt.</p> <p>Recognition of No Contribution to Green Belt Purpose</p> <p>Additionally, as confirmed at paragraphs 2.89 to 2.90, LDC introduces a new, fourth assessment rating category, over and above those used consistently by LDC in their previous Green Belt review work. LDC states the following at paragraph 2.89:</p> <p><i>“Arup recommended that a fourth ‘no role’ category be included in order to allow for those instances where land is assessed as not fulfilling the specific Green Belt purpose.”</i></p> <p>LDC go on to define ‘no role’ as: “makes no contribution to the Green Belt purpose.” EDP consider this to be a welcomed addition to the assessment process, which is pragmatic and realistic of this type of assessment.</p> <p>Rating Criterion</p> <p>Since the LDCGBR January 2019 Method Statement, LDC have applied a rating criterion, with a written definition, this is a welcomed amendment within the current June 2019 Method Statement.</p>	<p>the Green Belt as set out in national policy. The additional criteria are used within the assessment form to provide further detail and context.</p> <p>Comments noted.</p> <p>Comments noted.</p>	<p>No further comments.</p> <p>No further comments.</p>

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	<p>At paragraph 2.66, LDC states the following: “The NPPF does not propose that any one purpose is more important than the other with all purposes in effect carry equal weight.” However, it is anticipated, that most land parcels in the LDC GBR would be scored as making a significant contribution towards any one of the five Green Belt purposes (quite probably “checking unrestricted sprawl”, “preventing neighbouring towns sprawling” and “safeguarding countryside”). It remains the case, that most development parcels will extend established settlement limits. However, through the lack of a numerical scoring, the LDCGBR June 2019 is unlikely to identify the most essential Green Belt, as most land parcels would be rated too generically through a written rating.</p> <p>At paragraph 2.90, LDC identifies their rating categorisation which ranges from Important (high), through Moderate (medium) and Minor (low), and now allows for ‘no role’ to be included in the assessment for those land cover parcels which “<i>make no contribution to the Green Belt purpose</i>” (as per paragraph 2.90). This is a welcomed addition to the previous scoring/categorisation within the previous LDCGBR January 2019. This is a pragmatic introduction, which responds to the prospect of some land cover parcel actually performing no meaningful contribution to one, or more, of the Green Belt functions.</p> <p>However, the LDCGBR June 2019 does not break down this rating criterion further to a numerical based system. This would be of benefit to the undertaking of the LDCGBR as it would enable the most eligible sites for Green Belt release to be identified. In EDP’s experience of recent Green Belt Studies published by Local Planning Authorities, such a numerical scoring system is commonly utilised. For instance, the Rushcliffe Borough Council’s ‘Rushcliffe Green Belt Review Part 2b (Detailed Review of the Nottingham-Derby Green Belt within Rushcliffe) Assessment of Additional Sites in Key Settlements and Other Villages’, as well as the ‘West Midlands Joint Green Belt Study’ undertaken in 2015 by a number of Local Planning Authorities including Coventry City Council, Nuneaton and Bedworth Borough Council, Stratford-upon-Avon District Council and Warwick District Council.</p>	<p>Comments noted.</p> <p>Comments noted. Approach to the fifth purpose is considered appropriate and based on good practice.</p>	<p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Undertaking an Overall Assessment With reference to paragraph 2.91 of the latest Method Statement (June 2019), the methodology for the overall assessment has been amended since the January 2019 Method Statement. The NPPF February 2019, does not propose that any one of the five Green Belt functions is actually individually more important than the others. However, the January 2019 method statement rated the overall contribution of a land parcel on the highest rating of even one of the functions. EDP has always maintained, that this approach is misleading, and has the potential to not realise the most suitable land for Green Belt release. EDP welcomes this amendment to the methodology since the January 2019 LDCGBR.</p> <p>At paragraph 2.9, a more “nuanced approach” is confirmed, which, “enables a finer grain overall assessment to be undertaken.” LDC are encouraging professional judgement by the assessor, and where the majority of the function rating is considered to be the overall assessment rating for the land cover parcel. For instance, where the land cover parcel is rated as minor across three of the five functions, and moderate across the remaining two, the overall assessment rating would be Minor, and not Moderate (as would have been the case in January 2019). This is a departure from the January 2019 methodology, but is considered fair and equitable, and has a better potential of identifying the most appropriate land for Green Belt release. EDP welcomes this amendment to the methodology since the January 2019 LDCGBR.</p> <p>Appraising Contribution to Urban Regeneration As stated at paragraph 2.84 of the June 2019 Method Statement: “All Green Belt makes a strategic contribution to urban regeneration...”; and therefore, assume all Green Belt land contributes to the function of the Green Belt. In their June 2019 methodology, LDC go on to say: “...as such it is clear that Green Belt within Lichfield would play a moderate role in encouraging the use of derelict land.....as such all parcels will be scored the same against this criteria.”</p>	<p>Comments noted. The approach to the fifth purpose is considered to be proportionate and appropriate and based on good practice.</p> <p>The Method Statement prepared in January 2019 was a confidential document as described at stage 5a of the methodology. The agent was advised of this. The District Council did not accept submission from parties beyond those consulted at stage 5a.</p> <p>Comments noted. Criteria within the assessment of the third purpose allow consideration of potential boundaries in terms of permanence.</p>	<p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Consequently, the LDCGBR June 2019 continues to make no allowance for a land parcel to have no contribution to the fifth Green Belt purpose, which EDP asserts is a weakness of the current, and previous, iteration of the methodology. In the case of the settlements and landscapes within the Lichfield administrative area of Staffordshire, it is considered that LDC fails to recognise that land around isolated second or third tier settlements probably have little or no brownfield or derelict land due to established settlement edges and the manner in which these settlements have developed.</p> <p>In the case of a primary settlement, the function of land on its edge would make a more substantive contribution to Green Belt purpose 5 due to its inherent urban relationship. A good example of this is the settlement of Armitage, within which there is likely to be little, if any brownfield or derelict land. An argument might be made that Green Belt parcels around a settlement with a smaller area of unused urban land contribute more than parcels around a settlement with no urban, brownfield or derelict land parcels, and in this scenario such land around primary or higher tier settlements would have a greater relevance in the Green Belt Review.</p> <p>As previously stated in our critique of the LDCGBR January 2019 Method Statement, EDP considers, that it is possible for land cover parcels in the Green Belt to not contribute to all the purpose of the Green Belt. For instance, land adjacent to large built-up areas which make no contribution to preventing urban sprawl, or the land parcel does not form part of the setting or contribute to the special character of historic towns. In the case of the Armitage, I would suggest that the land parcel may well not contribute to Green Belt purpose 1 "To check the unrestricted sprawl of large built up areas", and Green Belt purpose 4 "To preserve the setting and special character of historic towns".</p> <p>Durable Boundary Resilience</p> <p>With regard to the revised NPPF (February 2019) paragraph 139, it is recognised that there are benefits in using natural features for the re-alignment of Green Belt boundaries. Ideally, these features are clearly defined on the ground, and perform a physical and/or visual role in separating town and countryside.</p>	<p>Comments noted.</p> <p>Comments noted. The purpose of the Green belt Review is to assess parcels/areas against the purposes of Green Belt.</p>	<p>Future defensible boundaries – If Green Belt release is required by the Council, Arup would recommend that submitted sites are assessed for their contribution to the Green Belt. Arup would not recommend progressing parcels through to later stage of the Local Plan Review unless their boundaries match submitted site boundaries. Future defensible boundaries should therefore be considered at any future site selection stage (if required).</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>The concept of permanence is a planning consideration rather than a physical one. Nevertheless, on reviewing the LDCGBR 2019 Method Statement from paragraph 2.58 onwards, and consideration of Appendix 1, Table 1, there is no provision for assessing the integrity and robustness of such features within the LDCGBR 2019, rather the recognition of long-term boundaries is sub-criteria of assessing Green Belt purpose 1 and would form part of the overall scoring. Robust, defensible boundaries are key to feasible Green Belt release by providing a fixed and permeant edge for re-aligning the Green Belt so that it is not altered in future years. As a result, EDP anticipates that there is potential for the LDCGBR 2019 to not identify the most essential Green Belt land area, and not prioritise land parcels which could be legitimately released from the Green Belt with the minimal amount of harm.</p> <p>In June 2019, LDC asserted that it would utilise physical, defensible boundaries for the definition of 'smaller parcels' and their individual quantum of space for the Green Belt review, categorising boundaries as either 'durable features' or those which 'lack durability'.</p> <p>However, the LDCGBR June 2019, does not seek to undertake a comparative assessment between land parcels on this matter i.e. to rate or score each site on the level and intactness of their boundaries either as "durable" or "lacking durability". This is especially applicable with land parcels adjoining existing settlement edges and roadways (reflecting NPPF February 2019 paragraph 139):</p> <p><i>"When defining boundaries, local planning authorities should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."</i></p> <p>EDP would suggest that the existing LDCGBR June 2019 Method Statement be expanded to include a comparative assessment between land parcels on this matter, with scoring (or rating) to distinguish between 'durable' and 'lacking durability'. EDP recognises that, whilst, some consideration has been applied by LDC in their selection of 'smaller parcels' and 'broad areas', the defensible boundaries for each land parcel has not been assessed, or site's distinguished between as part of the overall assessment process.</p>	<p>The consultation to which the representation was received represents the consultation referred to at stage 5b of the methodology.</p> <p>Comments noted. The methodology set out within the method statement is clear that following stage 5b stages 6 and 7 will take place which will result in the final document being published as part of the evidence supporting the Local Plan.</p>	<p>No further comments</p> <p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Exceptional Circumstances Paragraph 2.57 of the June 2019 methodology states “...it should be noted that ministerial statements and the National Planning Practice Guidance (PPG) make clear that unmet housing need will not in itself provide the exceptional circumstances required to remove land from the Green Belt.”</p> <p>Demonstrating exceptional circumstances requires the presentation of evidence which overrides the normal presumption that Green Belt boundaries should endure. It has already been established at the Cherwell District Council's Part 1 Partial Review Examination Initial Hearing Session, that such a shortfall can be enough exceptional circumstance for the release of Green Belt land for development.</p> <p>This initial hearing has held recently in late September 2018, following which, the Inspector confirmed the following in writing: “...it is clear to me that meeting Oxford's unmet need could, as a general principle, constitute an exceptional circumstance that would justify an alteration of Green Belt boundaries.”</p> <p>Consequently, EDP recommends, that this provision should be omitted from the forthcoming LDCGBR 2019. A Green Belt Review is a ‘policy off’ document, which informs local planning policy; however, it should not provide a view on policy.</p> <p>Further Consultation Paragraph 2.95 onwards of the LDCGBR June 2019 Method Statement indicates that another consultation will be launched on Stage 5b with wider stakeholders. This is something which EDP welcomes and considers to be essential for refining the appropriateness and effectiveness of the proposed methodology. EDP would be keen to seek clarifications from LDC on the likely date and timespan for this consultation, the manner and medium for consulting, and whom the wider audience of stakeholders would be.</p> <p>Timetable for Assessment With regard to paragraph 2.73 (and in general) of the LDCGBR 2019 Method Statement, LDC do not clarify the timetable for undertaking Green Belt Assessment, and for producing the final report. Given the quantum of work</p>	<p>Comments noted. As set out within the LDC author note adjacent. The consultant's assessment of their site utilising the methodology will not be considered.</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>involved in this assessment, EDP would advocate that a draft report is issued in the first instance for consultation. This would enable the checking of site analysis data, and the opportunity to address any inaccuracies in the assessment of land parcels.</p> <p>Site Appraisal (LDCGBR June 2019 Method Statement)</p> <p>In spring 2019, EDP undertook a site specific Green Belt Review for the site (ref: edp4572_r005). This review was undertaken in line with the methodology of the LDCGBR January 2019 Method Statement.</p> <p>With reference to this review, EDP summaries the finding of this exercise below:</p> <ul style="list-style-type: none"> • The site has a relatively Minor (at most) Green Belt function; • The removal of the site from the Green Belt (and release for a future development), would ensure the wider Green Belt remains functional without compromising the openness, whilst restricting of the 'sprawl' of development, safeguarding countryside from encroachment and preserving the setting of Armitage and its outlying settlements; • The boundaries of the site could provide a long term, defensible, development area, which serves to contribute to Green Belt functions in line with the Revised NPPF (Feb 2019) paragraph 139. In these respects, the future development of the site would be viable, and the intactness of the Green Belt would remain; and • EDP considers that, within the context of the area of open land between Armitage with Handsacre and the intervening countryside to wider settlements at Hills Ridware, Handsacre, Longdons and Rugeley; the functions of the Green Belt would remain constant, and not be adversely affected by the removal of this land for development. <p>A detailed tabulated analysis of the site's Green Belt function is contained with Appendix EDP L1 of this note, and for convenience, the rating for each Green Belt function is shown within Table EDP 3.1 below:</p>		

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>NPPF GB Function GB Function 1 To check the unrestricted sprawl of large built-up areas GB Function 2 To prevent neighbouring towns merging into one another GB Function 3 To assist in safeguarding the countryside from encroachment GB Function 4 To preserve the setting and special character of historic towns GB Function 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land Overall Rating</p> <p>Rating Minor Minor (However, EDP would rate the site as making No Contribution to this Green Belt Function) Minor (However, EDP would rate the site as making No Contribution to this Green Belt Function) Minor Minor N.B. LDC do not determine a rating for this Green Belt function Minor</p> <p><i>[LDC author note: the representation then includes an assessment of the site being referred to within the representation using the methodology within the method statement. The assessment undertaken by the consultant on behalf of their client will not be set out within this statement. For clarity The Green Belt Review will undertake parcel/area assessments utilising the methodology. It will not take account of alternative assessments undertaken by stakeholders. The full representation including the consultant's assessment can be made available on request.]</i></p> <p>With consideration of the June 2019 methodology, and in particular, the new function rating criterion, at paragraph 2.90, EDP considers that the site makes no contribution to the function of the Green Belt in three of its functions. Specifically, the site 'makes no contribution to the Green Belt purpose' in terms of preventing neighbouring towns merging into one another, and in safeguarding the countryside.</p>	<p>Comments noted.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Given the above, and consideration of paragraph 2.91 onwards ('Overall Assessment'), EDP finds that the site would continue to have an overall assessment of a Minor contribution to the purposes of the Green Belt. This demonstrates a consistency in Green Belt Review, with our undertaking of appraisals in March 2019, and again in July 2019. (March 2019).</p> <p>Most significantly, the June methodology recognises some of the deficiencies of the former methodology and demonstrates our March 2019 review was legitimate and robust. There are aspects of the site's function which make no contribution to Green Belt purpose.</p> <p>This recognition benefits the site's feasibility for Green Belt release and demonstrates that the site is not a land cover parcel to be considered as the most essential Green Belt, and potentially more suitable than other candidate sites for release through a 'Green Belt off' initiative.</p> <p>More importantly, the definition and recognition of permeant, defensible boundaries by the June 2018 methodology, is one which further supports the site's suitability for Green Belt release. With consideration of 'Chapter 13: Protecting Green Belt land' of the Revised NPPF (Feb 2019), we are able to review the appraisal site in a wider sense (relative to the Revised NPPF) to deliver a well-rounded and robust opinion of the site's release from the Green Belt.</p> <p>Paragraph 138 states the following: <i>"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of developments...They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."</i></p> <p>Paragraph 139 states the following (pertinent to this Green Belt review): <i>"When defining Green Belt boundaries, plans should...where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."</i></p>		

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>With consideration of paragraph 2.63 and Table 1: Boundary Definition of the LDCGBR June 2019 Method Statement, LDC now rates the 'durability', or permanence of boundary and physical features, which may make up the physical and geographical limitations of a site, for which Green Belt could be realigned to for release land for sustainable development. This is in line with the emphasis of paragraph 139 of the revised NPPF (February 2019) i.e. define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</p> <p>LDC differentiates between 'durable features' and 'features lacking durability' within its categorisation within Table 1. In this definition, durability is derived from permanence and overall discernibility in the urban edge environment. With consideration of this new initiative within the June 2019 methodology, EDP finds, that the site has a number of well-established and extensive durable features, which robustly define the site, and accord with the more resilient, 'durable' definition utilised by LDC. Table 1 highlights the following elements as 'durable features':</p> <ul style="list-style-type: none"> • Motorways, A and B roads; • Railway lines; • Existing development with clear and established boundaries; • Waterbodies and water courses; • Prominent landform; and • Protected woodland, ancient woodland or hedgerow. <p>Within our site specific Green Belt Review in March 2019, EDP found that the site is inherently enclosed and limited by strong robust physical features, which are all long established and permanent. The site is experienced as within the village setting of Armitage with Handsacre, and lies between existing residential development, within robustly hedged and tree-clad boundaries, which project further southwards and enclose the site on both sides. From our site assessment in March 2019, EDP considers that the site is defined by well established, permanent 'durable features', which include an A road</p>		

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>(Rugeley Road), well established development and existing hedgerows, as noted below in detail:</p> <ul style="list-style-type: none"> • The northern edge of the parcel has some frontage to Rugeley Road. The site is bounded by existing residential development to the north and north-east, as well as mature native hedgerows with mature trees to the south-eastern and southern edges of the site; • Bardy Lane runs in part along the southern edge of the site; the route is a narrow 'country lane' with is enclosed by extensively vegetated verges, robust hedgerows and mature trees, giving the route a 'sunken' feel. Beyond this route, there is a discernible landform change, hence, Bardy Lane acts as a hinterland; • The western boundary is defined by a robust hedgerow with extensive trees, beyond which there is one open agricultural field which is partially enclosed by hedgerow; and • The Lower Lodge Residential Mobile Home Park is situated approximately 0.3km to the west of the site. <p>Moreover. EDP considers, that there is great potential to re-align the Green Belt relative to the site in order to satisfy the requirements of the Revised NPPF (Feb 2019) paragraph 139: <i>"When defining Green Belt boundaries...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."</i> Hence, EDP considers, that the realignment of the Green Belt at this site is sustainable and appropriate in longevity.</p> <p>Furthermore, there is great scope to further enhance the robustness of the southern and western hedgerow through the integration of landscaping and green infrastructure interventions within proposed areas of public amenity, to create "physical features that are readily recognisable and likely to be permanent." This initiative would ensure that the future development of the appraisal site would not be prominent, and that countryside beyond the site's</p>		

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>physical boundaries remained open and in accordance with Revised NPPF (Feb 2019) paragraph 139.</p> <p>Summary (LDCGBR June 2019 Method Statement)</p> <p>It is acknowledged that there is limited guidance on the issue of Green Belt Review, and the required use of a 'professional judgement' to legitimately assess land parcels for Green Belt release. Hence, Green Belt Reviews are not straight forward exercises, and are often open to debate.</p> <p>In this instance, however, there have been a number of positive amendments to the LDCGBR June 2019 Method Statement (since the previous iteration in January 2019). However, there remains some areas which require response through the questioning contained within this Position Note, which potentially could lead to a number of weakness with the undertaking of the forthcoming Green Belt Review by Lichfield District Council, before any weight should be afforded to their findings and recommendations.</p> <p>With the application of the June 2019 methodology, EDP has demonstrated consistency in our ratings of each Green Belt function (in March 2019, and again in July 2019). Moreover, through the most recent methodology initiates, EDP can legitimately state, that the site clearly makes no contribution in part to Green Belt role (which can now be formally recognised by LDC), as well demonstrating that the site is defined and enclosed by well-established, permanent features, which are 'durable features' likely to be 'readily recognizable and permanent'.</p> <p>Through the application of the LDCGBR June 2019 Method Statement, the potential for releasing this site from the Green Belt designation for future residential development, without compromising the openness of the countryside, whilst restricting of the 'sprawl' of development, safeguarding countryside from encroachment and preserving the setting of Armitage and its outlying settlements.</p> <p>Furthermore, due to the location and physical features individual to the site, there is scope to realise its development. The site has strong defensible, physical features to the majority of its boundaries which encloses the site.</p>		

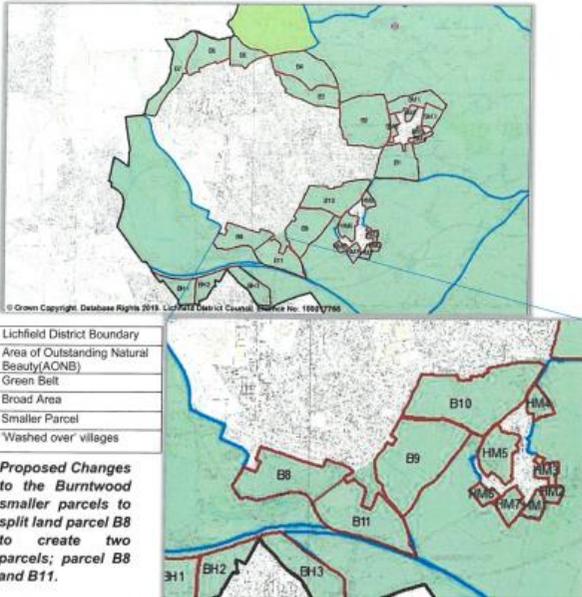
Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Hence, the future of any Green Belt edge could be re-aligned to these long established, robust, defensible boundaries.</p> <p>An appropriate masterplan for a development would ensure the extension and embellishment of these boundaries to ensure the scheme does not encroach outwards into the wider countryside. EDP considers the development of the site would not detract anything from the openness of the Green Belt area, and would not lead to a perception of ribbon development.</p>		
GB31: Historic England	<p>Many thanks for consulting Historic England on the Lichfield Green Belt Review. Please note that Historic England also raised comments on the methodology of this review at an earlier stage, as set out in Appendix B of this consultation document.</p> <p>Our comments are as follows:</p> <ul style="list-style-type: none"> We welcome the recognition of the five purposes of the Green Belt in section 1.1 and the clear reference to historic towns. Paragraph 2.15 cites the need to consider minimum density, especially in urban areas. We would urge the Council to consider preparing a building heights/ tall buildings strategy which assesses, in part, where higher densities will be more appropriate. Lichfield is an important historic cathedral city and as such careful consideration will be required to ensure that appropriate densities for new development are proposed. We support the reference in paragraph 2.51. We note the detailed description referencing the fourth purpose of the Green Belt - relating to historic towns and the setting of, and we welcome the inclusion of clear advice. We would encourage a further point to be included that references the setting of Lichfield Cathedral in particular, as the significance of this heritage asset could be affected by development a considerable way away. It would further 	<p>Comments noted. This is not something which would be included within a Green Belt Review.</p> <p>Comments noted. The assessment criteria are considered to be robust and proportionate. This allows for the consideration of historic assets. It is not part of the purposes of the Green Belt so protect specially identified views.</p> <p>Comments noted.</p>	<p>No further comments</p> <p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>be useful to include a reference to how the land parcels could affect the significance of heritage assets and their setting, beyond the initial assessment of views highlighted.</p> <ul style="list-style-type: none"> As we raised in October 2016, Historic England would expect detailed assessment to be undertaken on any potential land allocations in respect of impacts to the historic environment. Additionally, in our previous response we did include a number of links to useful documents. For clarity, I include a link below to our advice note that details how to progress site allocations in local plans which you may find useful as the evidence develops. Additionally, I include a link to our Good Practice Advice Note 3 on Setting which may also be of use when considering how the setting of historic towns may be affected. <p>https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <ul style="list-style-type: none"> Stage 6 references the detailed site assessment process and we would encourage the Council to refer to the Historic Environment Record to gain additional information about heritage assets that could be affected, relevant heritage documents including conservation area appraisals and management plans etc. and also to liaise with specialist local heritage staff to ensure that appropriate knowledge is used in this assessment process. Appendix A 'Site Assessment Proforma' example includes a clause about whether there is public access to the land parcel being considered for removal from the Green Belt, in reference to purpose 4. We 	<p>Comments noted.</p> <p>Comments noted.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>No further comments.</p> <p>No further comments.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>consider that there could be potential harm to the setting of a historic town where no public access currently exists and as such this would not be a defining factor. Additionally, it would be useful to assess what impact there was from identified heritage assets including views out to the countryside, as well as from the potential land parcels. Such as views from Lichfield Cathedral back toward the land parcels as the relationships between assets, between views, between town and country will be relevant both ways.</p> <ul style="list-style-type: none"> • We would welcome the inclusion of a bullet point in the table on page 37 that seeks to enhance heritage assets/ historic landscapes where possible. • Appendix D sets out the specific parcels of land being considered through the Green Belt Review process, we will comment in detail on any of these sites if they come forward through the Local Plan process as potential site allocations or as planning applications, where relevant. We are further happy to offer comments on the assessment results of this Green Belt Review process. 		
GB32: First City	<p>We are writing to provide you with our comments on the above document on behalf of the land owners. As you are aware the land owners are working in conjunction with Redrow Homes and Turley to promote their interests in the land situated south of Highfields Road, Burntwood, Staffordshire for development. First City Limited have submitted representations at the various stages of the now adopted Local Plan and the Local Plan Review. We welcomed the opportunity to submit our comments to the Council in relation to the Green Belt Review Method Statement which we know forms an important evidence base</p>	Comments noted.	No further comments.

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>document that will be used to support and influence future decision in the forthcoming Local Plan Review.</p> <p>Our intention in submitting these further representations is for us to explain what we consider to be an appropriate spatial strategy for the future development of Burntwood.</p> <p>We set out our comments below. Our main area of concern in connection to the Green Belt Review Method Statement is in regard to Stage 3: Identification of Land Parcels.</p> <p>We understand the need to devise a process to identify land parcels however, we do consider it is important that it is the starting point for investigation. To ensure a logical and appropriate parcel of land is identified, parcels need to be looked at on a case by case scenario. Table 1: Boundary definition sets out two main criteria Durable and non-durable features.</p>	<p>Comments noted. The methodology sets out the approach to identification of parcels/areas. It is considered that this has been applied consistently.</p>	<p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Durable features – features which are readily recognisable and likely to be permanent</p> <p>Boundaries formed by infrastructure:</p> <ul style="list-style-type: none"> • Motorways, Roads (A and B roads) and unclassified adopted highway. • Railway line (either in use or safeguarded – including route of HS2 where appropriate). • Existing development with clear and established boundaries (e.g. a hard or contiguous building line). <p>Natural boundaries:</p> <ul style="list-style-type: none"> • Water bodies and water courses (reservoirs, lakes, meres, rivers, streams and canals). • Prominent landform (e.g. ridgeline) • Protected woodland, ancient woodland or hedgerow. <p>Where a parcel/area is on the edge of the Green Belt boundary the existing boundary will form parcel/area boundary in that location.</p> <p>Features lacking durability – softer boundaries which are recognisable but have lesser permanence.</p> <p>Boundaries formed by infrastructure:</p> <ul style="list-style-type: none"> • Private/non adopted roads or tracks. • Existing development with irregular boundaries • Footpaths where accompanied by other physical feature (e.g. wall, fence, hedge). <p>Natural boundaries:</p> <ul style="list-style-type: none"> • Field boundary where accompanied by other natural features (e.g. tree line, hedge line, fence). • Watercourse (brook, drainage ditch, culverted water course accompanied by other physical features (e.g. hedge, fence). <p>In principle, the above criteria set out in the Green Belt Review Method Statement seems appropriate, however, in practice we do not consider the above has been applied accurately for the proposed parcels as set out in Appendix D: Green Belt Parcels and Areas for Assessment.</p> <p>For the settlement of Burntwood, as shown on plan D.2. It would appear there are several parcels identified, all of varying shapes and sizes, some which are significantly larger than others.</p> <p>The area closest to the settlement of Burntwood has a very different landscape and relationship to the settlement and will perform significantly different to the land which features in the south-eastern extent of the parcel against the NPPF Green Belt purposes.</p>	<p>Comments noted. The methodology sets out the approach to identification of parcels/areas. It is considered that this has been applied consistently.</p>	<p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>It is noted around St Matthews and Hammerwich there are smaller land parcels (parcels SM1-6 and HM1-7) and therefore not only should land features such as hedgerows and roads be used to assess sites, there is the requirement for some consistency in parcel size as it is clear larger parcels will not have a uniform scoring if part of the parcel is adjacent to a settlement.</p> <p>We consider parcel B8 is too large and suggest the following amendment.</p>  <p>We consider parcel B8 should be split into two parcels with Wharf Lane as the Durable feature separating the parcels. The land to the west of Wharf Lane would also follow the existing hard and continuous building line created by Wharf Lane and Hospital Lane. We consider this would provide a fair and robust scenario for which to carry out the assessment against.</p>	<p>Comments noted. The methodology sets out the approach to identification of parcels/areas. It is considered that this has been applied consistently.</p>	<p>Parcel B8 – Arup agrees that parcel B8 could be split into two along Wharf Lane however the parcel shown as B11 in the comment should then be reduced in size to utilise Ogle Hey Road as the eastern boundary as this is the next durable boundary.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>The above changes would also align with the Council's previous Local Plan Allocations Supplementary Green Belt Report 2016.</p> <p><i>Regarding parcel B8, previously known as Burntwood S1, it states, "The assessments of parcels Burntwood North 1,2,3 and 4 (B1,B2,B3,B4) note that these are primarily in mixed-agricultural use and consist of a network of fields bounded by hedgerows proximity of the parcels to the Cannock Chase AONB. The parcels are assessed as being 'important' in terms of assisting safeguarding countryside from encroachment however, given the nature of the settlement this is an assessment that applies to all but one of the parcels assessed (parcel Burntwood South 1 - BS1) . . . Whilst it is assessed as being 'important' both in terms of checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging the assessment of Parcel BS1 notes this only plays a moderate role in terms of safeguarding the countryside from encroachment. This is primarily due to the location of the M6 Toll which bounds the parcel to the south. The parcel itself is made up of a number of agricultural fields of a small to medium size. Part of the parcel has previously been promoted for residential development and is included within the SHLAA. This represents a much smaller part of the parcel which is directly adjacent to the southern edge of Burntwood to its north and north west. To the south the site is defined by the field boundary which extends only slightly further south than the existing built development along Paviers Road/Anglesey Close. Indeed, an assessment of this smaller area could result in a different outcome to that within the 2013 report. Proposals for the site could see the establishment of a defensible boundary which defines the Green Belt through the establishment of a new defensible boundary bounded by open space as a screen to the M6 Toll.</i></p> <p><i>In terms of Burntwood this supplementary report recommends:</i></p> <ul style="list-style-type: none"> <i>Sites be considered to be removed from the Green Belt to assist in meeting the strategic housing requirements of the adopted LPS in line with the spatial strategy. Any such release(s) from the Green Belt is considered in terms of the principles set out within the Supplementary Report 2013 where possible;</i> 	<p>Comments noted. The site reference within the representation was not proposed for allocation within the Local Plan Allocations document when submitted for examination. The Local Plan Allocations document has been examined, found sound subject to main modifications and adopted as part of the Council's Development Plan.</p>	<p>No further comments</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<ul style="list-style-type: none"> Part of parcels S1 should be considered to be released from the Green Belt. Exceptional circumstances to justify such release are the requirement to deliver the strategic housing growth set out within the LPS in the most sustainable manner in line with the spatial strategy for growth. The site is closely related to the settlement with access to facilities and would provide an additional quantum of development which could assist in the maintenance/improvement of services and facilities within the settlement; and Clear, defensible boundaries should be considered when defining Green Belt boundaries including roads, tracks/paths and field boundaries. The southern field boundary should be used as a defensible boundary, this boundary does not extend further south than the existing built form of the settlement.” <p style="text-align: center;"><i>Local Plan Allocations Supplementary Green Belt Report 2016 November 2016 Chapter 3.2 Burntwood including St Matthews pages 16-17</i></p> <p>We therefore agree with the recommendations set out in the supplementary report of 2016. The land south of Highfields Road (between Highfields Road and M6 Toll) and to the west of Wharf Lane should be assessed as a separate parcel of land as shown above.</p> <p>It was also acknowledged that there was insufficient land within the Urban areas of the District to meet the housing requirements for the settlements within the District. This is further confirmed in paragraph 2.55 of the Method Statement June 2019.</p> <p>We consider the District will, again be unable to identify sufficient land within the Urban Areas to meet the future needs of the District in the forthcoming Local Plan Review and will result in the release of Green Belt land. We therefore consider it is of paramount importance to define parcels appropriately, so the assessment is robust.</p>		

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	<p>We would also like to respectfully remind the Council the land south of Highfields Road was proposed for allocation within the Local Plan to accommodate residential development of approximately 250 dwellings. The site was removed from the Local Plan and Site Allocations document due to public objection not due to the role it plays within the Green Belt as a result of the NPPF criterion. The Council had deemed the site a viable and serious option for allocation and therefore the Council themselves, by identifying the site in the Core Strategy Preferred Options consultation document, December 2008 and the Local Plan Allocations Consultation 2017 acknowledged the role the site played in the Green Belt was of lesser value than others around the settlement and not enough to supersede the possibility for the site to accommodate housing. We do not consider the role of the site within the Green Belt has changed and will not result in it being of high Green Belt value against the NPPF criterion.</p> <p>We thank the Council for the opportunity to submit our comments on the consultation of the Lichfield District Council Green Belt Review Method Statement June 2019 and would appreciate if the Council could alert us regarding future consultations in connection to the Local Plan Review and associated evidence base documents.</p>		
<p>GB33: Pegasus Group on behalf of Fusion Building Consultancy Limited</p>	<p>This letter provides Fusion Building Consultancy Limited (Fusion) representations in response to the consultation on the Green Belt Review Method Statement (June 2019). Fusion are the freehold owners of land at Drayton Manor Business Park (located off the Coleshill Road (A4091)) and are promoting their land as a potential employment allocation. Fusion firmly believe that their site (see Appendix 1) would provide an excellent location to expand Drayton Manor Business Park and would provide additional employment land to meet the needs of Tamworth Borough. In terms of our response to the consultation, we have sought to follow and refer to the general chapter headings, sub-headings and paragraph numbers contained within the consultation document so that it is clear to which our response relates. Our comments are as follows:</p> <p>Methodology</p>	<p>Comments noted. The purpose of the Green Belt Review is to assess</p>	

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>Existing Green Belt Evidence We note that the Council intend to draw on existing work carried out within Lichfield District. Whilst we have no objection to this evidence being used as a general approach to the Review process, we are concerned that this evidence is focused mainly on housing, rather than employment. Further work will be required to establish employment needs, and particularly explore options for meeting the unmet employment needs of Tamworth and Birmingham and the demands of the employment market generally. For these reasons the existing evidence base - predicated on previous housing strategies – can not be relied upon to inform the method for considering changes to the Green Belt to meet potential employment needs.</p> <p>Stage 3: Identification of Land Parcels In general, we support the Council's approach of identifying 'smaller parcels' as well as 'broad areas' as part of the Green Belt Review. It should however be recognised that site specific proposals - put forward by developments/landowners for instance - are unlikely to reflect the parcels proposed for assessment. It is therefore essential that further, finer grained site-specific Green Belt assessments are undertaken to inform the site selection process, using for example, sites put forward within the Employment Land Availability Assessment (ELAA). The Council should therefore commit to undertaking a more refined site-specific assessment as an additional stage in the Green Belt Review methodology to ensure a robust approach to site selection as it does not appear that Stage 6 will take into account sites put forward by developers/landowners.</p> <p>At paragraph 2.63 of the Methodology it states that the Green Belt Review will include "identification of smaller parcels be extended to settlements in neighbouring authorities which abut the Lichfield Green Belt". Although some sites have been identified on the edge of Little Aston, few other 'smaller parcels' have been identified to meet cross boundary needs. The Green Belt Review should be prepared on the basis of meeting housing and employment needs of neighbouring authorities and sites identified to assist with this purpose.</p>	<p>parcels/areas against the purposes of the Green Belt. This does not relate to potential uses of land, rather it provides an objective assessment in terms of the purposes of Green Belt.</p> <p>Comments noted.</p> <p>Comments noted. Parcels/areas have been identified using the approach set out within the methodology. The approach has been applied consistently.</p> <p>Comments noted. Paragraph 2.64 of the method statement is clear that the approach used to define broad areas is consistent with that of defining small parcels. It also states that given the nature of broad areas the most durable features will be used when defining parcels.</p>	<p>No further comments.</p> <p>No further comments</p> <p>No further comments.</p> <p>Identification of Broad Areas – Arup agrees that further explanation is required as to how the broad areas have been defined as they do not include all roads boundaries. They also don't solely include 'A' roads. Arup has often undertaken an exercise to</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>With regards to the 'Broad Areas' identified in Figure 3, it is not clear how these have been chosen from the Methodology. Table 1 explains how the smaller parcels are to be identified, and the approach outlined here seems reasonable and logical. Paragraph 2.64 states that the same criteria have been used to identify the broad parcels, but clearly the larger areas contain many of the features referred in Table 1 (including roads and railway lines etc) but does not explain how the broad parcel were ultimately selected. It would be useful if the Council could explain how and why the broad parcels were chosen as some are particularly extensive, and cross various features that would generally be considered defensible features. For example, we note that land adjacent Drayton Manor Business Park falls within Broad Area BA10. This parcel covers a substantial area, extending from the A38 to the west to the eastern edge of Lichfield District's administrative area to the east. Within this area there are numerous features that could provide defensible boundaries, such as the A453 and A4091. Further detail on how the broad areas have been identified would be required for clarity.</p> <p>Stage 4: Designing the Assessment Approach</p> <p>We agree that any parcels identified will need to be assessed against the purposes of the Green Belt as outlined in the NPPF (paragraph 134) and we do not wish to raise concerns regarding the approach to the overall assessment at this stage.</p> <p>It does however appear that the review methodology is focusing solely on locations on the edge of settlements, which would suggest that the scope of the Review has been predetermined. An entirely 'policy off' approach should be carried out when reviewing the Green Belt at this stage. Once the Local Plan Review is at a more advanced stage, with housing and employment growth needs better understood, then more detailed site-specific assessment will be necessary to identify sites that can accommodate the scale growth required. The strategic performance of these sites/parcels can then be reassessed having regard to the tests out at paragraph 134 of the NPPF.</p> <p>In terms of other issues, we note at paragraph 2.81 of the Review Methodology that any settlement with historic features, whether they comprise local or</p>	<p>Comments noted. The approach proposed within the methodology is based upon best practice. The Green belt Review will be a comprehensive assessment and assesses all areas of the Green Belt within the District using a robust and proportionate approach.</p> <p>Comments noted. Approach is considered to be appropriate and based on good practice.</p> <p>No changes to methodology recommended as a result of response.</p>	<p>merge broad areas which have similar characteristics in order to reduce numbers down to a manageable amount in the interests of efficiency and proportionality. If the Council has undertaken such an exercise to reach the current broad areas, Arup recommends that this is explained and detailed in the Method Statement.</p> <p>No further comments.</p>

Stakeholder	Comments	Council's response to comments	Arup response to Council comments
	<p>national designations, will be defined as a 'historic town' for the purposes of the Green Belt Review. This is a highly unusual approach. Paragraph 134(d) refers specifically to historic towns and a literal meaning should be taken from this i.e. only towns with historic interest should be considered against paragraph 134(d) rather than villages, which include heritage assets.</p> <p>We have welcomed the opportunity to comment on the Green Belt Review Methodology and we hope that the Council will consider our comments in progressing to the next stage of the Review process and we look forward to receiving the Council's comprehensive response to this consultation in due course.</p>		

4.0 Arup stage 3 report – review of Green Belt parcel and area assessments (October 2019)

Lichfield District Council

Green Belt Critical Friend Review

Stage 3: Review of Green Belt Parcel
and Area Assessments

Final | 29 October 2019

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 267466-00

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1 Introduction

In March 2019, Ove Arup & Partners (“Arup”) was appointed by Lichfield District Council (“the Council”) to act as a critical friend on the Green Belt Review in order to assist the Council in the preparation of a sound and robust document.

The commission involves a number of different stages which will take place at various points during the preparation of the Green Belt Review. Stage 1 involved an independent review of the draft Green Belt Review Method Statement (March 2019) and this stage was completed in May 2019. Following on from this, the Council consulted on the method statement with wider stakeholders (see Stage 5b of the Method Statement). Stage 2 involved a critical friend review of the consultation responses and amended Method Statement and this stage was completed in September 2019. Using the final Method Statement the Council undertook site visits and completed Green Belt assessments of the parcels and broad areas. This stage represents the Stage 3 critical friend review of those assessments.

In reviewing the assessments, Arup has focused on whether the method has been correctly and consistently applied. As we have not undertaken any site visits, we have assumed that the site-specific information contained in the assessments is correct. The application of the overall assessment rules is considered in the first instance and each purpose is then considered in turn. Given that purpose 5 includes a blanket level of moderate contribution, there is no need to consider this. The report concludes with a summary and recommendations section.

2 Review of Green Belt Parcel and Area Assessments

2.1 Application of the Overall Assessment Rules

The overall assessment rules have been correctly and consistently applied. Arup recommends that the overall assessment of parcel AH5 is reviewed. This is the only parcel which has one ‘important’ category and has been assessed as less than ‘moderate’ overall. When compared to parcel DB3, it is unclear why this is scored differently overall. Whilst Paragraph 133 of the NPPF notes that the “...fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open”, it also notes that “...the essential characteristics of Green Belts are their openness and their permanence”. Whilst parcel AH5 has a lesser role in preventing sprawl, the assessment of purpose 3 recognises that it is open countryside and it is not enclosed by existing development.

2.2 Assessment of Purpose 1

The method for purpose 1 has been consistently applied overall. In relation to criteria 7: “*Is the parcel/area well contacted to the built up area along a number of boundaries? Could development of the parcel/area be considered to “round off” the pattern of the built up area?*” The typing error of ‘well contacted’ requires correcting. There appears to be some inconsistency in the assessment of the criteria on rounding off. The criteria refers to rounding off of the built up area whereas the assessment of some parcels considers the rounding off of villages. For example, parcels FZ3, HM5, H1, LD2, S5, ST1, ST2, ST3, UL1, W1, W2 and W3 mention the potential to round off the village. It is recommended that the assessment is amended to only mention rounding off where it involves the defined ‘large built up areas’ as the justification behind its inclusion is that if development creates a more ‘rounded’ pattern, it could not be defined as sprawl of the large built up area. For example, the assessment for parcel B3 on rounding off has been correctly applied given that Burntwood is a defined large built up area.

The following parcels need to be checked as the comments in the assessment column, comment column and concluding purpose 1 assessment row are inconsistent: parcel B10, SM2, SM4, SM5 and SM6. For example, the assessment and comment columns for parcel B10 correctly state that ‘development could be considered to ‘round off’ to a degree’ however the concluding purpose 1 assessment row states: ‘development of parcel could not be considered to ‘round off’...’

2.3 Assessment of Purpose 2

On the whole Purpose 2 has been consistently applied and assessed. Arup recommends that the assessment of parcel AH5 recognises that it lies within the gap between Armitage with Handsacre and Lichfield City. Although this gap is very large (approx. 4.5km), Arup recommends that this still acknowledged given that the Burntwood assessments for parcels B3-B6 recognise that the gap between Burntwood and Rugeley is approximately 6km and this is assessed as ‘minor’ for

purpose 2. It follows that AH5 should also be assessed as ‘minor contribution’. The same principle applies to the parcels listed below which are all currently assessed as ‘no contribution’. Consideration should be given as to whether these should be assessed as ‘minor contribution’:

- HM1, HM2 and HM3 - Located within the gap between Hammerwich and Shenstone. Very large gap of approximately 4.2km.
- H4, H5, H6 and FZ2 - Located within the gap between Hopwas and Mile Oak/Bonehill. Gap is approximately 2km.
- H3 - This is already assessed as ‘Important’ as it forms part of the gap between Hopwas and Tamworth. It is also located within the gap between Hopwas and Mile Oak/Bonehill therefore whilst the level of contribution will not change, this gap should also be acknowledged. Gap is approximately 2km.
- H6 - Located within the gap between Hopwas and Shenstone. Very large gap of approximately 5.7km.
- L1, L2 and L3 - Located within the gap between Lichfield City and Longdon/Armitage with Handsacre. Gap ranges from 4-5km depending on parcel.
- S6 and FZ1 - Located within the gap between Shenstone and Mile Oak. Very large gap of approximately 7km.
- S7 – Located within the gap between Shenstone and Hopwas. Very large gap of approximately 6km.

Parcel SM6 and B2 are assessed as minor for purpose 2. It is unclear from the assessments how the St Matthew’s Estate has been considered. Arup would assume that the St Matthew’s Estate forms part of the inset settlement of Burntwood. If so, then SM6 does not appear to make any contribution to purpose 2 as it is technically enclosed by the settlement. However, parcel B2 notes that “*Development of the parcel would not result in the merging of towns but would see the closure of a gap between Burntwood and the built area of the St Matthews Estate.*” It is therefore not clear whether the St Matthew’s Estate is being treated as a separate inset settlement or part of Burntwood. Arup recommends that this is made clear in the assessments and any assessments are revised if necessary.

2.4 Assessment of Purpose 3

The following parcels are currently assessed as no contribution for purpose 3 due to them not being deemed to be ‘countryside’: L6, DB2, SM2 and SM5.

Parcel L6 states: “*Majority of parcel is formed by Beacon park. Outdoor recreation uses are appropriate in Green Belt but are not intrinsically countryside in character. The parcel is enclosed by the settlement on three sides. There [is] no encroaching development within the [parcel sic].*” Arup considers that this is an overly strict interpretation of the meaning of countryside given that much of the parcel is undeveloped and in its natural state. It also appears to be contradictory to

state that there is no encroaching development within the parcel and to assess the parcel as making no contribution to purpose 3. Arup would consider the parcel to be ‘countryside’ and it is recommended that the assessment also acknowledges that there is limited existing encroachment within the parcel. There appears to be some public toilets, car parks, Lakeside Bistro and Beacon Park Village. Overall this amounts to approximately 10% of the overall parcel and therefore the majority of the parcel consists of open countryside. The same principle applies to parcels DB2 and SM2 which also consist of recreation grounds. Parcel SM5 consists of a cemetery and has also been assessed as ‘no contribution’ to purpose 3 on the basis that ‘it does not have the character of open countryside’. The NPPF notes that cemeteries and burial grounds are not inappropriate uses in the Green Belt provided they preserve openness. From Google Maps it appears that the cemetery is very open with views across and beyond it. The only built form consists of the access road and the grave stones however these do not impact upon openness. The assessment already recognises that the parcel is enclosed by the settlement on three sides which is a relevant consideration however Arup considers that the assessment of ‘no contribution’ is an overly strict interpretation of the purpose and this should be reviewed.

Arup notes that a very large number of the assessments are coming out as ‘important’ for purpose 3. This appears to be because the main consideration is whether the parcel consists of ‘countryside’ or not. In some cases, the assessment category has been reduced where the parcel has encroaching development within it or where it is enclosed by the settlement on a number of sides. The strength of boundary features does not appear to impact the scoring of purpose 3. Arup takes the approach that if the parcel has a strong and durable boundary with the settlement and/or the countryside, this will reduce the risk of development encroaching beyond it, both into the parcel and beyond the parcel into the countryside. Therefore, this will reduce the parcel’s contribution slightly. For example, it is noted that parcels B4 and B6 have durable road boundaries both with the settlement and countryside and the assessment states “*Roads which bound the parcel could prevent encroachment*”. Taking this into account, the assessment could therefore be ‘moderate contribution’ instead of the current ‘important contribution’. The same could apply to parcels L13 and L15 as well as AH1 as the assessment for AH1 states: “*As noted the road [and] canal could prevent encroachment within or at the edge of the parcel.*”

2.5 Assessment of Purpose 4

Assuming that the final updated method statement makes clear that the historic core relates to the Conservation Area boundary, the method has been consistently applied and undertaken.

3 Summary and Recommendations

This report represents the Stage 3 critical friend review and provides an independent review of Green Belt parcel and area assessments in order to ensure that the method has been correctly and consistently applied.

Arup reiterates that there is no single ‘correct’ method for undertaking Green Belt Reviews and an element of professional judgement is always applied in the assessments. Furthermore, Arup has not undertaken any site visits and the Council’s local and site specific knowledge is key to the assessments. As such Arup’s recommendations are purely based on our experience and knowledge of good practice and the Council can choose whether to accept them or not.

In summary, Arup recommends the following:

Application of the Overall Assessment Rules:

- Arup recommends that the overall assessment of parcel AH5 is reviewed.

Assessment of Purpose 1:

- Arup recommends that the assessments are amended to only mention rounding off where it involves the defined ‘large built up areas’. This applies to the following parcels which currently refer to the potential to round off the village: FZ3, HM5, H1, LD2, S5, ST1, ST2, ST3, UL1, W1, W2 and W3.
- Corrections are required to the following parcels which have inconsistencies between the assessment column, the comment column and the concluding purpose 1 assessment row: B10, SM2, SM4, SM5 and SM6.

Assessment of Purpose 2:

- Arup recommends that the following parcels are reviewed and the assessment is amended to ‘minor contribution’ given that they are currently assessed as ‘no contribution’ and do not acknowledge that they are located within a gap between two neighbouring towns:
 - AH5 – Located within the gap between Armitage with Handscare and Lichfield City. Very large gap of approximately 4.5km.
 - HM1, HM2 and HM3 - Located within the gap between Hammerwich and Shenstone. Very large gap of approximately 4.2km.
 - H4, H5, H6 and FZ2 - Located within the gap between Hopwas and Mile Oak/Bonehill. Gap is approximately 2km.
 - H3 - This is already assessed as ‘Important’ as it forms part of the gap between Hopwas and Tamworth. It is also located within the gap between Hopwas and Mile Oak/Bonehill therefore whilst the level of contribution will not change, this gap should also be acknowledged. Gap is approximately 2km.

- H6 - Located within the gap between Hopwas and Shenstone. Very large gap of approximately 5.7km.
- L1, L2 and L3 - Located within the gap between Lichfield City and Longdown/Armitage with Handsacre. Gap ranges from 4-5km depending on parcel.
- S6 and FZ1 - Located within the gap between Shenstone and Mile Oak. Very large gap of approximately 7km.
- S7 – Located within the gap between Shenstone and Hopwas. Very large gap of approximately 6km.
- Arup recommends that clarification is provided as to how the St Matthew's Estate (Burntwood) has been treated and whether it is considered as part of the inset settlement of Burntwood or as a standalone inset settlement. This impacts upon the assessment of parcels SM6 and B2.

Assessment of Purpose 3:

- Arup recommends that the assessment of parcels L6, DB2, SM2 and SM5 are reviewed as an overly strict interpretation of the purpose has been taken. In applying the definition of countryside, recreation uses and cemeteries have been deemed not to have the character of open countryside and these parcels have been assessed as 'no contribution' for purpose 3 despite them being open with very limited levels of encroachment.
- Arup recommends that boundary strength forms a relevant consideration in the overall scoring for purpose 3. At present, boundary strength does not appear to impact the score. For example, parcels B4, B6, L13, L15 and AH1 are noted as having road boundaries which could prevent encroachment and therefore the score for purpose 3 could reflect this.