

Stoke-on-Trent City Council

Green Belt Assessment Part 3

Final Report

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1. Introduction

1.1 Context

In October 2024, Ove Arup & Partners ('Arup') was commissioned by Stoke-on-Trent City Council ('the Council') to prepare a Green Belt Assessment Part 3.

Arup was previously commissioned to undertake two Green Belt Reviews (Green Belt Assessment Part 1 (November 2017)¹) and Green Belt Assessment Part 2 (2019-20) consisting of a Green Belt Site Review, Exceptional Circumstances Review and Green Belt Village Report). These reviews considered the previous joint planning area of Newcastle under Lyme and Stoke on Trent City Council (the draft Joint Local Plan). Since this work concluded, the two authorities have ceased work on the Joint Local Plan and have agreed to develop Local Plans individually.

The Council conducted an Issues and Options consultation in May 2021 with consultation on the Preferred Options (Regulation 18) Local Plan timetabled for September/October 2025. Consultation on the Publication (Regulation 19) Local Plan is timetabled for April/May 2026 with submission to the Secretary of State timetabled for November 2026. Once adopted the new Local Plan will replace the current adopted Newcastle-under-Lyme and Stoke-on-Trent Joint Core Spatial Strategy 2009 and the saved policies from the Stoke-on-Trent City Plan 2001.

The Green Belt Assessment Part 3 will form part of the evidence base underpinning the new Local Plan. It has been over 30 years since the Green Belt boundary has been reviewed in Stoke-on-Trent. Whilst the Government attaches great importance to the protection of Green Belt, there is increasing pressure to release Green Belt land in order to meet housing and employment land requirements. As with the Green Belt Assessments Part 1 and 2, this study will assist the Council in understanding how the Green Belt in Stoke-on-Trent is performing against the purposes set out in national policy. This study will therefore be used as part of the evidence base to support the emerging Preferred Option (Regulation 18) Local Plan, building on the Green Belt Assessments Part 1 and Part 2 completed in 2017 and 2020 respectively.

It is relevant to note that the new NPPF was published on 12 December 2024. This sets out a number of changes to Green Belt policy, most notably the addition of 'grey belt'. An accompanying update to the Green Belt section of the PPG was also published on 27 February 2025. This study has been prepared based on the new NPPF and PPG.

1.2 Scope of the Green Belt Assessment Part 3

The Green Belt Assessment Part 3 will consider the following elements:

- **Green Belt assessment method** – a review of existing Green Belt evidence including the Green Belt Assessment (Part 1 and Part 2), national policy and guidance, case law, legislation, approaches adopted by other local authorities, and the responses to the Council's Issues and Options consultation will be undertaken to determine what changes are required to the Green Belt approach and methodology. Based on this review, a method will be established and explained.

¹ [Stoke-on-Trent and Newcastle-under-Lyme Joint Green Belt Assessment document link](#)

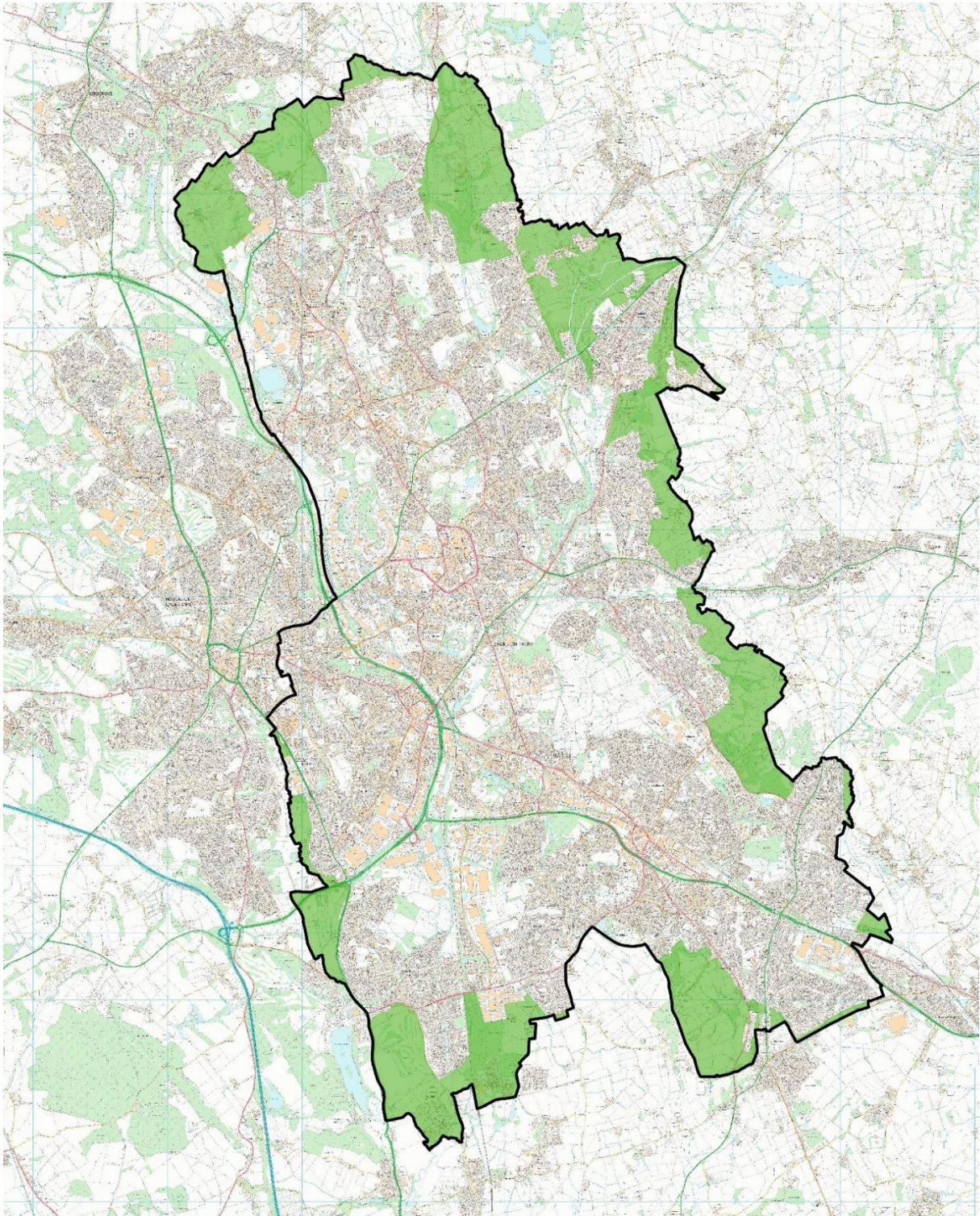
- **Green Belt site assessments** – applying the identified method, a Green Belt assessment of contender sites will be undertaken.
- **Exceptional circumstances case review** – based on paragraph 146 and 147 NPPF, an update to the previous ‘Exceptional Circumstances Review’ (November 2019) from the Green Belt Part 2 study will be undertaken. Recent case study examples from Local Plan Examinations as well as the Council’s emerging evidence base will be considered as part of this update.
- **Safeguarded land advice** – based on paragraph 149 NPPF, a recommended approach to determine whether safeguarded land is firstly necessary, and then to determine the quantum and location of safeguarded land will be set out. This will draw on national policy, guidance and case studies from recent Local Plan Examinations.
- **Green Belt village review** – based on the recent appeal decision at Norton Green (Ref: APP/M3455/W/22/3299359), an assessment will be undertaken to establish whether Stoke-on-Trent has any villages which are either inset and/or washed over by the Green Belt. This will be based on clearly defined criteria taking into account appeal decisions, case law, and similar studies from other local authorities. The focus of this element will be on the definition of a village rather than paragraph 150 of the NPPF which considers whether a village should be washed over or inset. The assessment will only consider villages which are either within or surrounded by Green Belt.

1.3 Study Area

The Stoke-on-Trent Green Belt forms part of the wider North Staffordshire Green Belt. The Stoke-on-Trent Green Belt is tight and narrow from the urban area up to the authority boundary creating green wedges between the urban area. The Green Belt is therefore contiguous with Staffordshire Moorlands Council to the east and Stafford Council to the south, with the role and function of these authorities’ Green Belts therefore being particularly relevant to Stoke-on-Trent. To the north and west of Stoke-on-Trent, the Green Belt is contiguous with Newcastle-under-Lyme.

Figure 1 below shows the Green Belt as currently designated within Stoke-on-Trent and this forms the study area for the Green Belt Assessment Part 3.

Figure 1. Green Belt in Stoke-on-Trent



1.4 Structure of this Report

This report is structured as follows:

- Section 2 sets out a Green Belt site assessment method building on the previous Green Belt Assessment (Part 1 and Part 2) and based on a review of national policy and guidance, case law, legislation, and the approaches adopted by other local authorities.
- Section 3 provides an assessment of the Council's contender sites applying the methodology established in Section 2. The site assessment proformas and a map of the sites is provided in Appendix B and C.
- Section 4 provides a review of the Council's exceptional circumstances case. This represents an update to the previous 'Exceptional Circumstances Review' (November 2019) forming part of the Green Belt Part 2 study. It considers national policy and guidance and considers the approaches taken by other local authorities with recently adopted Local Plans. A review of the Council's emerging evidence base is undertaken.
- Section 5 provides advice on safeguarded land. It considers national policy and guidance and considers the approaches taken by other local authorities with recently adopted Local Plans. A recommended approach is set out to assist the Council in determining whether safeguarded land is necessary and to determine the quantum and location of safeguarded land.
- Section 6 sets out the Green Belt village review focused on villages located either within the Green Belt or surrounded by Green Belt. It establishes a method for determining how a village is defined and applying this method to Stoke-on-Trent. The method has been established based on appeal decisions, case law, and similar studies from other local authorities.

2. Green Belt Site Assessment Method

2.1 Overview

This section sets out a Green Belt site assessment method building on the previous Green Belt Assessment (Part 1 and Part 2) and based on a review of national policy and guidance, case law, legislation, and the approaches adopted by other local authorities. The responses to the Council's Issues and Options consultation have been reviewed in the context of any required changes to the Green Belt approach and methodology.

2.2 Planning Policy Context and Legislation

2.2.1 Overview

This section provides a review of the latest national planning policy context and guidance in relation to the Green Belt. It draws on the revised NPPF (December 2024) and the updated PPG (27 February 2025). Relevant case law and new legislation is also considered.

2.2.2 National Policy and Guidance

National Planning Policy Framework (December 2024)

The revised version of the NPPF was published on 12 December 2024. Paragraphs 142 and 143 set out the role and purpose of the Green Belt, as follows:

'142. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

143. Green Belt serves five purposes:

- 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'.*

Paragraph 145 confirms that exceptional circumstances must be fully evidenced and justified in order to alter Green Belt boundaries. Paragraph 145 states:

'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.'

Paragraph 146 is a new paragraph in this revised version of the NPPF and it identifies examples of exceptional circumstances. The implications of this new paragraph are that most local authorities with Green Belt will need to review their boundaries unless the Green Belt Review provides clear evidence that alterations would ‘fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.’ Paragraph 146 states:

‘Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.’

Paragraph 147 emphasises that before concluding that exceptional circumstances exist, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. In order to demonstrate this, the strategy should do the following:

- ‘a) makes as much use possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground’.*

One of the most significant Green Belt additions in the revised NPPF is the new concept of grey belt (this is referred to in paragraph 148 and defined in Annex 2). Annex 2 (glossary) defines grey belt as ‘...land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Paragraph 148 requires the need to promote sustainable patterns of development to be taken into account when drawing up or reviewing Green Belt boundaries.’

Linked to the new concept of grey belt, paragraph 148 sets out the sequential approach for Green Belt release. It states

‘Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making 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.’

When defining Green Belt boundaries, Paragraph 149 requires plans to:

- 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 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. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

It is important to note that the identification of grey belt is relevant to both plan-making and decision taking. Paragraph 155 states that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where the '*...development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*'.

A further significant addition in the new NPPF is the 'Golden Rules' (contributions) which apply to land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application. These are set out in paragraph 156-157. Paragraph 156 states that the following contribution should be made:

- "a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. necessary improvements to local or national infrastructure; and*
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces."*

Planning Practice Guidance (27 February 2025)

An update to the Green Belt section of the PPG was published on 27 February 2025.

Paragraph 001 confirms that where grey belt is identified, "*...it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF).*"

Paragraph 002 confirms that in order to identify grey belt land, authorities should produce a Green Belt assessment. The key steps in a Green Belt assessment are set out in paragraph 003. These are as follows:

- *"identify the location and appropriate scale of area/s to be assessed*

- *evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d), using the criteria identified below*
- *consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area*
- *identify grey belt land*
- *identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.”*

In assessing the Green Belt, paragraph 004 confirms that authorities can divide their Green Belt into separate assessment areas with the number of size of these being defined at a local level and in response to local circumstances. Paragraph 004 lists out a number of principles which should be considered as part of this:

- *“when identifying assessment areas, authorities should consider all Green Belt within their Plan areas in the first instance*
- *to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes*
- *a small number of large assessment areas will not be appropriate in most circumstances – authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary*
- *authorities should consider where it may be appropriate to vary the size of assessment areas based on local circumstances. For example, the assessment of smaller areas may be appropriate in certain places, such as around existing settlements or public transport hubs or corridors.”*

Paragraph 005 assists in the assessment against Green Belt purposes a, b and d setting out the considerations to inform these judgements – see Table 1 below. In relation to Purpose a, it is confirmed that villages should not be considered large built up areas. In relation to Purposes b and d, it is confirmed that these relate to towns and not villages although no further definition of town or village is provided.

Table 1. Considerations in assessing Purpose a, b and d (Paragraph 005)

Contribution	Illustrative features
	Purpose A – to check the unrestricted sprawl of large built up areas
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s

Contribution	Illustrative features
	<p>contribution to this purpose a, such as (but not limited to):</p> <ul style="list-style-type: none"> - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or none	<p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development
Purpose B – to prevent neighbouring towns merging into one another	
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	<p>Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or none	<p>Assessment areas that contribute weakly are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation
Purpose D – to preserve the setting and special character of historic towns	
Strong	<p>Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features:</p> <ul style="list-style-type: none"> - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	<p>Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or</p>

Contribution	Illustrative features
	<p>more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or none	<p>Assessment areas that make no or only a weak contribution are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

The definition of grey belt in the NPPF refers to footnote 7. Paragraph 007 of PPG provides further guidance on how to consider this. It confirms “...*authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.*”

Paragraph 146 of the NPPF refers to the impact on the remaining Green Belt of releasing land stating that this should not ‘...fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.’ Paragraph 008 of the PPG provides further guidance on this stating that in reaching this judgement, “...*authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.*”

The NPPF at paragraph 148 emphasises the need to promote sustainable patterns of development when drawing up or reviewing Green Belt boundaries. Paragraph 011 of the PPG confirms that “...*where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate. Whether locations are sustainable should be determined in light of local context and site or development-specific considerations. However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions, as set out in paragraphs 110 and 115 of the NPPF.*”

In relation to the factors which can be taken into account when considering the potential impact of development on the openness of the Green Belt, Paragraph 013 notes that the courts have identified a number of matters which include, but are not limited to:

- ‘*openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.*’

Planning Advisory Service Guidance (2015)

Although it is becoming increasingly dated, the Planning Advisory Service (PAS) published guidance² for Green Belt Assessments. Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. It acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt but that could be a planning consideration when seeking suitable locations for development.

The guidance outlines considerations to be made in relation to the five purposes as set out below:

- Purpose a: To check the unrestricted sprawl of large built-up areas, consider the meaning of sprawl compared to 1930s definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- Purpose b: To prevent neighbouring towns from merging into one another, the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A 'scale rule' approach should be avoided; landscape character assessment is a useful analytical tool for this type of assessment.
- Purpose c: In relation to assisting in safeguarding the countryside from encroachment, it is noted that seemingly all Green Belt achieves this purpose. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be kept open, accounting for edges and boundaries.
- Purpose d: To preserve the setting and special character of historic towns, the guidance notes it is accepted that in practice this purpose relates to very few settlements as a result of the envelopment of historic town centres by development.
- Purpose e: To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of potentially developable land within urban areas must have already been factored in when Green Belt land was initially identified. It is considered that all Green Belt achieves this purpose to the same extent, and that the Green Belt value of parcels when assessed against purpose e is unlikely to be distinguishable.

The NPPF requires local planning authorities to work collaboratively on strategic matters that cross administrative boundaries. The PAS guidance recognises that Green Belt is a strategic policy, and hence a strategic matter in terms of the Duty to Cooperate.

Relevant Case Law

Latest case law relevant to this study focuses on the definition of openness. The case of *Turner v SSCLG* [2016] EWCA Civ 466 established the principle that openness has both a spatial and a visual dimension. The Judge stated that the concept of 'openness' is not "*narrowly limited to [a] volumetric approach...visual impact is implicitly part of the concept of 'openness of the Green Belt.'*"

² PAS (2015) Planning on the Doorstep: The Big Issues

More recently, the Supreme Court case of *R (on the application of Samuel Smith Old Brewery) v North Yorkshire County Council* [2020] UKSC 3 considered the concept of openness. The Judge concluded:

“[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector” [Paragraph 25] ... “...*There was no error of law on the face of the report. Paragraph 90 [now NPPF146] does not expressly refer to visual impact as a necessary part of the analysis, nor in my view is it made so by implication. As explained in my discussion of the authorities, the matters relevant to openness in any particular case are a matter of planning judgement, not law.*” [Paragraph 39]

The Supreme Court did not dispute the approach in *Turner* but acknowledged that *Turner* did not specify how visual effects may or may not be taken into account. The Supreme Court judgement clarifies that it is not an implicit requirement to consider the visual effects on Green Belt openness, however it does not imply that this is not relevant, it just wasn't in this case. Ultimately, it is a matter of planning judgement for the planning authority or the inspector.

2.2.3 New Legislation and Transitional Arrangements

Levelling Up and Regeneration Act (LURA)

The Levelling Up and Regeneration Bill received formal Royal Assent on 26 October 2023. The Act proposes significant reforms to the planning system and will have significant implications for how plans are prepared. However, at the time of writing, much of the Act remains subject to secondary Regulations and policy to support implementation and the timetable for this is unclear.

To that end, the Department for Levelling Up, Housing and Communities firstly launched the ‘Levelling-up and Regeneration Bill: Reforms to national policy’ in December 2022 followed by the ‘Consultation on implementation of plan-making reforms’ in July 2023. These consultations set out significant policy proposals related to the process of plan-making as well as transitional policy arrangements for implementation of the LURA. The publication of the new NPPF in December 2024 amended the proposals originally consulted on relating to transitional arrangements with paragraph 234 setting out the new transitional arrangements.

Whilst the proposed changes emerging from the Levelling-up and Regeneration Act and the Government's consultation documents could have significant implications for the new Local Plan, these will need to be considered in the context of plan-making as a whole.

Local Nature Recovery Strategies and Green Belt

In November 2021 the Environment Act became law across the UK, albeit only some parts of it apply in one or more jurisdictions.

Local Nature Recovery Strategies (LNRS) are introduced for England in Section 104. LNRS will set out a statement of biodiversity priorities for the strategy area and respond to Secretary of State's advice on areas which could be of greater importance for biodiversity, or which could contribute to the establishment of a network of areas across England. The Government has identified 48 strategy areas which cover the whole of England with no gaps or overlaps. The Secretary of State for Environment, Food and Rural Affairs has appointed ‘responsible authorities’ to lead the preparation

of the strategy for each area. Stoke-on-Trent is located within strategy area 18 (Staffordshire and Stoke-on-Trent) where the responsible authority is Staffordshire County Council.³

The LNRS Statutory Guidance (March 2023)⁴ at paragraph 82 states that: *“If a responsible authority has Green Belt in their area, they should actively seek to target areas that could become of particular importance inside the Green Belt. This supports the government’s intention for Green Belts to provide multiple benefits, including nature recovery and increased public access to nature. Similarly, responsible authorities should also look for areas that could become of particular importance near to people’s homes to improve public access to nature, biodiversity, and environmental benefits.”*

The NPPF at paragraph 156-157 sets out the ‘Golden Rules’ requirements for land released from the Green Belt through plan preparation or review. Paragraph 159 links to the requirement for the provision of new or improved existing green space and states that: *“Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.”* At this point in time, it is not envisaged that the LNRS will have any direct implications for this study.

2.3 Good Practice and Comparative Examples

2.3.1 Overview

There is no prescribed methodology for undertaking Green Belt Assessments. It is generally accepted that Green Belt reviews and assessments should take account of good practice advice and comparator studies⁵, with authorities generally taking a variety of approaches to date. The following section therefore specifically considers a comparative review of Green Belt studies undertaken by other local authorities whose Local Plans have been found sound at Examination and have been adopted. Given that these reviews have successfully been through Examination, this provides a greater degree of confidence in the approach. It should be noted however that all of the comparative examples are based on previous versions of the NPPF and do not take into account the latest revised version or the updated PPG. As such, it is acknowledged that there are likely to be differences in approach however this still provides useful context and understanding, particularly in relation to Purpose c and e which PPG does not provide any guidance on.

The detailed review of comparative examples is provided in Appendix A and the key findings are summarised below.

The approaches of the following authorities have been considered:

- Greater Manchester Combined Authority (Joint Plan adopted 21 March 2024)
- Warrington Council (Local Plan adopted 4 December 2023)
- Calderdale Council (Local Plan adopted 22 March 2023)

³ [Map of local nature recovery strategy areas and responsible authorities webpage](#)

⁴ [Local nature recovery strategy statutory guidance webpage](#)

⁵ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

- North Hertfordshire Council (Local Plan adopted 8 November 2022)
- Cheshire East Council (Local Plan adopted July 2017)

2.3.2 Comparative Review

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

General approach and scope

All of the studies involved a multi-stage process, and the terminology applied to these studies varies considerably, some authorities refer to Stage 1 and Stage 2 Green Belt Reviews or Assessments whilst others incorporate elements within their Site Selection or Site Allocation process after completion of an initial Green Belt Assessment or Review. Whilst the approaches vary significantly, there are similarities which can be drawn, and which can be applied in shaping the approach to the current assessment.

All of the studies reviewed involved a process of defining/identifying parcels, areas, or sites, and assessing these against Green Belt purposes. All of the studies utilised a desktop assessment combined with site visits.

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

Approach to assessing the five Green Belt purposes

Rating

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

Purpose A

Most of the studies defined 'large built-up area' for the purposes of the study. Greater Manchester Combined Authority, Warrington, and Calderdale provided a specific definition of the large-built up area whereas North Hertfordshire and Cheshire East both used all inset settlements/urban areas.

The criteria to assess Purpose a involved consideration of a range of factors. Greater Manchester Combined Authority considered existing sprawl/open character, boundary features, nature of the settlement form (including potential for rounding off), potential for ribbon development, and potential for sprawl to occur beyond the parcel boundary. Warrington and Cheshire East considered adjacency to the large built-up area, whether there were existing durable boundaries to prevent

sprawl, the potential for rounding off, and the parcel's role in preventing ribbon development. Calderdale considered boundaries, ribbon development, irregular settlement patterns, connection to the built-up area, and proximity to the built-up area. North Hertfordshire considered the role of the land in preventing the spread of development.

Purpose B

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

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

Purpose C

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

Purpose D

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

Cheshire East had initially not assessed Purpose d in the previous Green Belt Assessment however the Inspector had raised this as a flaw in the methodology in the Inspector's Interim Views. Purpose d was therefore included in the Green Belt Assessment Update. In his Further Interim Views, the Local Plan Inspector comments on the approach to Purpose d: *"The assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be*

criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant.” (Paragraph 45)

Purpose E

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

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

Cheshire East assessed Purpose e on a settlement basis taking into account the percentage of brownfield urban potential within the settlement. The Council's previous version of the Green Belt Assessment had not considered Purpose e and the Inspector had raised this as a flaw in the methodology in the Inspector's Interim Views.

Overall assessment

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

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

Consideration of Green Belt harm

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

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

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

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

2.3.3 Summary of Findings

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

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

2.4 Local Green Belt Context

2.4.1 Evolution of the Green Belt in Stoke-on-Trent

The Green Belt in Stoke-on-Trent forms part of the wider North Staffordshire Green Belt. This was originally defined in 1967 and was then reassessed through the Staffordshire Structure Plan 1986-2001 however no alterations were made to the boundaries. The North Staffordshire Green Belt Local Plan was adopted in 1983 and included a reassessment of the Green Belt boundary which did result in some boundary changes and outlined new policies for the protection of the Green Belt. The Green Belt Local Plan broadly maintained the originally defined 1967 boundary, with the exception of detailed changes to the inner boundary in order to correctly reflect the limits of the built up area.

The Green Belt Local Plan in the 'Summary of Survey and Issues Section' notes the function of the North Staffordshire Green Belt in directing the continuing pressure for development in rural areas to the regeneration of the older parts of the urban areas and maintaining the valuable tracts of open countryside near the built up area (para 1.02).

At paragraph 2.03, it sets out the established aims of the Green Belt in North Staffordshire, as originally approved by the County Council in 1967. This is as follows:

“a) To limit the expansion into adjoining open country of the urban areas of North Staffordshire forming part of the Potteries Conurbation.

b) To prevent the following towns and settlements in the adjoining open area from merging with the Potteries Conurbation and with other settlements;

a) The built up areas of Kidsgrove and Biddulph;

b) The settlements of Brown Edge, Endon, Stanley, Bagnall, Stanley Moor, Norton Green, Baddeley Green, Baddeley Edge, Light Oaks, Werrington, Cellarhead, Caverswall, Cookshill, Blythe Bridge, Forsbrook, Meir Heath, Barlaston, Alsagers Bank, Halmer End, Miles Green, Wood Lane, Bignall End and Audley.

c) To prevent the coalescence of the following towns and settlements around the Potteries Conurbation:

- *Leek with Longsdon;*
- *Leek with Cheddleton;*
- *Longsdon with Cheddleton;*
- *Longsdon with Endon;*
- *Cheddleton with Folly Lane;*
- *Folly Lane with Wetley Rocks;*
- *Wetley Rocks with Cellarhead;*
- *Cheadle with Kingsley Holt;*
- *Kingsley with Kingsley Holt;*
- *Cheadle with Dihorne;*
- *Cheadle with Forsbrook;*
- *Fulford with Meir Heath;*
- *Stone with Oulton;*
- *Stone with Yarfield;*
- *Tittensor with Barlaston;*
- *Barlaston with Stone;*
- *Madeley Heath with Madeley;*
- *Betley with Audley.*

d) To maintain the present open character of the land within the North Staffordshire Green Belt and to prevent the coalescence of smaller settlements not mentioned above.”

At paragraph 2.04, the Local Plan adds that “...a major aim of the Green Belt Local Plan is to promote positive policies for the use of land within the Green Belt.”

Paragraph 2.07 notes that the general policies of the North Staffordshire Green Belt are intended to ensure there is no unplanned expansion of the North Staffordshire conurbation; the expansion of built-up areas is limited so that towns and villages do not merge with each other or the conurbation; and an area of open country will be safeguarded in the interests of agriculture, forestry and nature conservation to provide a source of recreation and enjoyment.

The Green Belt Local Plan was superseded by the Stoke-on-Trent City Plan 1990-2001 which was adopted in 1993. This set out new policies for the Green Belt and made a change to the Green Belt boundary at Ravensdale. This was necessary to meet the need for high quality development land. Paragraph 27 of the Summary Section of City Plan states: *“The maintenance of the North Staffordshire Green Belt will prevent the uncontrolled growth of the City, safeguard surrounding countryside and assist urban regeneration by encouraging the development of inner-city sites. It is protected by strong development control policies; these are especially important in safeguarding areas on the fringe, where development pressures are greatest.”* Paragraph 5.5 of the Plan reiterates the Structure Plan’s emphasis on the role of the Green Belt *“...in checking the otherwise unrestricted sprawl of built-up areas and assisting in urban regeneration. It also seeks to retain as much land as possible in the green wedges that penetrate built-up areas along major river valleys in order to maintain the open character and to link open spaces in the urban area with the open countryside.”*

The Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026 (‘Joint Core Strategy’) was adopted in 2009. This did not include any alterations to the Green Belt boundary and the City Plan policies remained as saved policies.

2.4.2 Previous Green Belt Assessments

The previous Green Belt evidence which involved an assessment of the Green Belt includes the Green Belt Assessment Part 1 (November 2017)⁶ and the Green Belt Site Review (December 2020), forming part of the Green Belt Assessment Part 2 (2019-20). These studies considered the previous joint planning area of Newcastle-under-Lyme and Stoke-on-Trent City Council.

The Part 1 study provided an assessment of the entire Green Belt against the five Green Belt purposes set out in the NPPF. A methodology was developed taking into account national policy, guidance and good practice. The methodology provided an interpretation of the five Green Belt purposes relevant to the local context of Newcastle-under-Lyme and Stoke-on-Trent. For each purpose, a number of criteria were developed requiring quantitative and qualitative responses and an element of professional judgement. A qualitative scoring system was applied to each purpose and to the overall assessment consisting of ‘no, weak, moderate and strong contribution’. The assessments were undertaken in two stages: Stage 1 involved dividing the whole Green Belt into General Areas. These areas were then assessed against the five Green Belt purposes in order to identify areas for further assessment under Stage 2. Stage 2 involved defining smaller Green Belt parcels adjacent to the urban areas and all inset settlements, as well as in General Areas assessed as making a ‘weak’ contribution to the Green Belt. These parcels were then assessed against the five Green Belt purposes applying the same methodology as for Stage 1.

Following on from the Part 1 study, the Part 2 study considered ‘contender sites’ within the Green Belt instead of General Areas and parcels considered in Part 1. The aim of the study was to identify the most appropriate Green Belt sites for the Councils to take forward for consideration for release

⁶ [Stoke-on-Trent and Newcastle-under-Lyme Joint Green Belt Assessment document link](#)

(alongside other evidence). The first stage of the process was undertaken by the Councils and involved the identification of the contender sites to assess. 12 contender sites were identified in Stoke-on-Trent and 71 contender sites were identified in Newcastle-under-Lyme. An assessment of the contender sites against the five Green Belt purposes was undertaken applying the same methodology as the Part 1 study. Following on from this, an additional assessment (the Green Belt Site Review) was undertaken for those contender sites which made a weak or moderate contribution to Green Belt purposes. Stage 1 of this assessment considered the suitability, availability and achievability of the site and made a recommendation to either take the site forward or to exclude the site from the process. For those sites recommended to be taken forward, Stage 2 considered the implications of releasing the site from the Green Belt (in terms of any harm to the function and integrity of the Green Belt) and the resultant Green Belt boundaries. A conclusion on Green Belt impact was then made. If it was concluded that removal of the site (or sites, if cumulative) would harm Green Belt function and purpose, a recommendation was made to exclude the site from the process. If it was concluded that removal of the site would not harm the Green Belt, a recommendation was made to take the site forward for further consideration by the Councils.

2.4.3 Issues and Options Consultation Responses

The Issues and Options Consultation on the draft Local Plan closed in June 2021. The responses have been reviewed to identify comments relevant to this study. There were no comments which would be directly relevant to the Green Belt assessment methodology.

2.5 Green Belt Assessment Methodology

2.5.1 Overview

Based on the review of national policy, guidance, case law, legislation, and the approaches adopted by other local authorities, the updated Green Belt assessment methodology is set out below.

Many elements of the Green Belt Site Review methodology which was originally established in the Green Belt Assessments Part 1 and 2 are still applicable and relevant and have not been impacted by the changes in the new NPPF and updated PPG. Where parts of the methodology remain valid, these have been retained. The key changes that have been made to the methodology are as follows:

- Terminology has been updated to accord with PPG in relation to the purposes (purposes a-e) referred to previously as purposes 1-5.
- The definitions and criteria applied in relation to the assessment of Green Belt purposes have been reviewed in light of the updated PPG - this predominantly applies to purposes a, b and d however all purposes have been reviewed. This has resulted in the following changes:
 - Purpose A – the criteria to assess purpose a have been updated to align with PPG.
 - Purpose B - the ‘neighbouring towns’ identified for purpose b have been updated to ensure that only towns are defined and not villages. The criteria to assess purpose b have been updated to align with PPG.
 - Purpose C – the criteria to assess purpose c have been updated due to changes to the purpose a criteria which would duplicate certain elements of purpose c. These have therefore been removed to avoid any duplication of assessment.
 - Purpose D - the ‘historic towns’ identified for purpose d have been updated to ensure that only towns are defined and not villages. The criteria to assess purpose d have been updated to align with PPG.

- An additional stage in the methodology has been included to identify ‘grey belt’ which was introduced in the new NPPF (in paragraph 148 and defined in Annex 2). Where grey belt is identified, this is considered to be ‘provisional’ grey belt given that a full assessment against footnote 7 designations will be required.
- The previous Green Belt Site Review methodology included an assessment of the suitability, availability and achievability prior to considering Green Belt impact. Given that the Council has already considered this for all Green Belt sites as part of the HELAA, it is no longer considered necessary to undertake this stage.

In addition, beyond the methodology, in taking sites forward for further consideration, the Council will now need to apply the new sequential approach to Green Belt release, as set out in paragraph 148 NPPF (requiring consideration of previously developed Green Belt land first, followed by grey belt which is not previously developed, and then other Green Belt locations, and at all stages taking into account the need to promote sustainable patterns of development). This study does not consider the sustainability of sites given that other evidence considers this.

The NPPF 2023 at paragraph 147 previously included a requirement for Local Plans to “...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.” The PPG had expanded upon this with guidance on measures that could be considered in order to provide those compensatory improvements, such as new or enhanced green infrastructure, woodland planning, landscape and visual enhancements, improvements to biodiversity, new or enhanced walking and cycling routes, and new or enhanced recreation and playing field provision. The requirement for compensatory improvements when releasing land from the Green Belt no longer exists in the current NPPF and PPG. New requirements for necessary improvements to local infrastructure and provision of accessible green spaces are required for land released from the Green Belt (NPPF, paragraph 156).

2.5.2 Overall Approach

The proposed approach is set out in figure 2 and described below. Where the methodology remains unchanged from the previous studies, it has been replicated below.

Figure 2. Summary of Approach

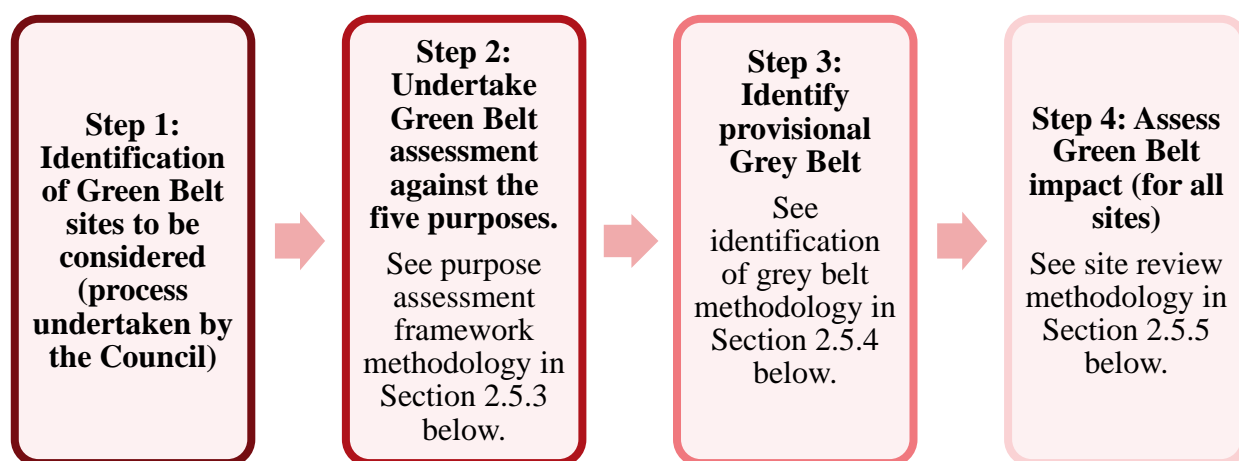


Table 2 below describes how the approach aligns with the Green Belt assessment steps set out in paragraph 003 of the updated PPG.

Table 2. Alignment of approach with Green Belt assessment steps set out in PPG

Key steps in a Green Belt assessment (paragraph 003 PPG)	How does the approach align with this?
Identify the location and appropriate scale of area/s to be assessed	Step 1 of the approach involves identifying the Green Belt sites to be assessed. This process was undertaken by the Council. It is noted that paragraph 004 PPG notes that areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes. The assessment of small to medium sites therefore accords with this.
Evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d)	Step 2 involves assessing the sites to understand their contribution to the five purposes of Green Belt set out in the NPPF. The methodology for this is set out in Section 2.5.3 below. Although paragraph 003 PPG only refers to purposes a, b and d, an assessment against all five purposes is considered necessary to understand the relative contribution to Green Belt purposes of those sites which aren't identified as grey belt.
Consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area Identify grey belt land	Step 3 involves using the findings from Step 2 to identify grey belt, based on the definition set out in the NPPF and the methodology set out in Section 2.5.3. The proposed approach does not include an assessment of footnote 7 designations as this will be undertaken by the Council at the next stage. As such, the grey belt identified in Step 3 is 'provisional grey belt' subject to a full assessment against footnote 7.
Identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan	It is envisaged that the Council will undertake the fundamentally undermine test as part of their exceptional circumstances case in order to consider the proposed Green Belt release in its entirety once the potential Green Belt allocations are known. As such, this has not been considered as part of this study. Step 4 does however include a Green Belt impact assessment for all sites (i.e. not just grey belt sites). The methodology for this is set out in Section 2.5.5 below. The impact assessment considers the implications of releasing the site from the Green Belt (in terms of any harm to the function and integrity of the remaining Green Belt) including any cumulative impacts, as well as the resultant Green Belt boundary. It is envisaged that the findings from both the Green Belt purpose assessment and Green Belt impact assessment will assist the Council in undertaking the fundamentally undermine test.

In relation to the recommendations set out in this study, it should be noted that:

- Recommendations to ‘take site forward for further consideration’ or ‘exclude site from process’ does not imply that a site will or won’t be released from the Green Belt. It is up to the Council to choose whether or not to accept the recommendations. This is ultimately determined on the basis of an evaluation of the Local Plan evidence base in its entirety, of which this study forms one component.
- All ‘grey belt’ identified as part of this study is considered to be ‘provisional grey belt’ subject to a full assessment against footnote 7 (as per the definition of grey belt in Annex 2 NPPF).
- Where it is considered necessary to release Green Belt land (including grey belt), the need to promote sustainable patterns of development will need to be taken into account as per paragraph 148 NPPF.
- Alterations to Green Belt boundaries require exceptional circumstances, which are fully evidenced and justified, in accordance with paragraph 145 and 146 of the NPPF. The Council will need to develop the exceptional circumstances case if they intend to release sites from the Green Belt.
- If the Council concludes that it is necessary to release sites from the Green Belt, the Golden Rules (contributions) set out in paragraph 156 and 157 of the NPPF will apply.

2.5.3 Step 2: Green Belt Purpose Assessment Framework

2.5.3.1 Overview

Paragraph 143 of the NPPF sets out the five purposes of Green Belt. It is necessary to interpret these given that there is no single ‘correct’ method as to how they should be applied.

- 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.’*

For each purpose a number of criteria were developed requiring quantitative and qualitative responses and an element of professional judgement. Methods of data collection (e.g. desk-based analysis or site-based analysis) have been documented against each purpose. A qualitative scoring system was developed for each purpose and for the overall assessment, consisting of a scale of the site’s contribution to the Green Belt purpose, these are shown and defined in the table below.

Table 3. Qualitative scoring system to be applied against each purpose and overall

Level of contribution	Description
Strong contribution	The site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt would detrimentally undermine this purpose

Level of contribution	Description
Moderate contribution	The site contributes to a few of the elements of the Green Belt purpose however does not fulfil all elements
Weak contribution	The site makes a limited contribution to an element of the Green Belt purpose
No contribution	The site makes no contribution to the Green Belt purpose

As each of the five purposes set out in the NPPF is considered to be equally important, no weighting or aggregation of scores across the purposes was undertaken. An element of professional judgement was utilised in applying the scoring system however the ‘Key Questions to Consider’ for each purpose is intended to break down the purpose in the interests of ensuring a transparent and consistent approach. This is set out in detail below including definitions applying to the purpose and to the approach. Furthermore, the rationale for the score applied and the justification against the criteria was recorded as part of the assessment.

Prior to undertaking any site assessments, all assessors were fully briefed on the methodology in order to ensure comprehensive understanding of the approach and consistency in assessments.

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

Table 4. Definitions for Purpose A

Definitions for Purpose A
<p>Sprawl – spreading out of building form over a large area in an untidy or irregular way (Oxford English Dictionary)</p> <p>Large built-up areas – this has been defined as the Stoke-on-Trent urban area⁷ (this includes Burslem, Fenton, Hanley, Longton, Meir, Stoke, and Tunstall), as set out in the Core Spatial Strategy Key Diagram. This does not include any inset settlement or settlements within other neighbouring authorities.</p>
<p>Definitions for this Approach</p> <p>Durable boundaries – refer to boundary definition in Table 6 below.</p> <p>Existing development – any form of built development except where it falls within one of the exception categories in paragraph 154 NPPF (i.e. it is not deemed to be inappropriate development in the Green Belt, for example buildings for agriculture and forestry).</p> <p>Well connected (or highly contained) – well connected to the built-up area, i.e. to be surrounded by high levels of built development.</p>

⁷ Reference has been taken from the Joint Core Spatial Strategy (2009) Key Diagram which shows three ‘Major Urban Areas’: Newcastle-under-Lyme, Stoke-on-Trent and Kidsgrove. As Newcastle-under-Lyme and Stoke-on-Trent form a contiguous urban area with Kidsgrove separated by the Green Belt, Kidsgrove has not been defined as a ‘large built up area’.

Definitions for Purpose A

Open land – land which is lacking development.

Round-off – where the existing urban area is an irregular shape, will the site fill in a gap and / or complete the shape?

Urbanising influences – existing development such as residential or commercial development, however not including development that falls within one of the exception categories in paragraph 154 NPPF (i.e. it is not deemed to be inappropriate development in the Green Belt, for example buildings for agriculture and forestry).

Approach to the Assessment

A desk and field-based assessment was applied to this purpose.

As this purpose only applies to the Stoke-on-Trent urban area, if the site was not adjacent to this it was assessed as ‘no contribution.’

Table 5. Purpose A Method

Key Questions to Consider	Recommended Approach
1. Is the site adjacent ⁸ to the large built-up area?	If yes , proceed to Question 2... If no , conclude site makes no contribution to purpose a
2. Does the site consist of open land which is free from existing development and other urbanising influences?	Describe existing use(s) of the site based on the following: <ul style="list-style-type: none"> • Strong contribution – The site is free of existing development and/or other urbanising influences. • Moderate contribution – The site contains some existing development and/or other urbanising influences although this is not extensive. • Weak contribution – The site contains significant existing development and/or other urbanising influences.
3. Are there existing physical features which could restrict and contain development?	Describe existing physical features based on the following: <ul style="list-style-type: none"> • Strong contribution – The boundaries between both the site and the large built-up area, and the site and the wider Green Belt are less durable, and there are no other durable boundaries in reasonable proximity. As such, the site lacks physical features that could restrict and contain development. • Moderate contribution – The site has a durable boundary either between the site and the large built-up area, between the site and the wider Green Belt, or in reasonable proximity. As such, the site has

⁸ For the purposes of the assessment this means that the site physically adjoins the defined large built up area along one or more boundaries.

Key Questions to Consider	Recommended Approach
	<p>physical features that could restrict and contain development.</p> <ul style="list-style-type: none"> • Weak contribution – The boundaries between both the site and the large built-up area, and the site and the wider Green Belt are durable, and there is a durable boundary in reasonable proximity. As such, the site has physical features that could restrict and contain development.
<p>4. Connection to large built-up area:</p> <p>a. Is the site enclosed by the large built up along a number of boundaries?</p> <p>b. Would development of the site result in an incongruous pattern of development?</p>	<p>Describe connection to the large built-up area based on the following:</p> <ul style="list-style-type: none"> • Strong contribution – The site is connected to the large built-up area and due to its level of connection, development would result in an incongruous pattern of development (i.e. such as an extended finger of development into the Green Belt). • Moderate contribution – The site is partially enclosed by the large built-up area and/or the connection to the large built-up area is such that new development would not result in an incongruous pattern of development. • Weak contribution – The site is largely enclosed by the large built-up area such that development would not result in an incongruous pattern of development and/or it could be considered to round off the settlement pattern.
<p>5. Overall assessment: What level of contribution does the site make to purpose a?</p>	<p>Bring together all conclusions from above to determine overall assessment. Professional judgement should be applied in determining the overall assessment as a site with significant existing development within it or a site which is largely enclosed by the large built-up area will make an overall weak contribution to this purpose regardless of the other considerations.</p> <p>Apply scoring system: No / Weak / Moderate / Strong contribution</p>

Table 6. Boundary Definition

<p>Durable Features (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)
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	<ul style="list-style-type: none"> 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)
Less durable features (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)
Undefined	Where the boundary does not follow any physical features on the ground.

Justification for the Approach

Given that the terminology of the purpose specifically refers to the ‘large built-up area’ it is important to define this. This approach is consistent with the comparative review in Section 2.3 where most authorities defined large built up area for the purposes of the study. It is notable that none of the other purposes include such terminology and instead make reference to ‘towns’ (see purpose b and d). Paragraph 005 of PPG confirms that ‘villages should not be considered large built up areas’.

The ‘large built up area’ has therefore been defined as the urban area of Stoke-on-Trent which includes Burslem, Fenton, Hanley, Longton, Meir, Stoke, and Tunstall. Reference has been taken from the Joint Core Spatial Strategy (2009) Key Diagram which shows three ‘Major Urban Areas’: Newcastle-under-Lyme, Stoke-on-Trent and Kidsgrove. However as Newcastle-under-Lyme and Stoke-on-Trent form a contiguous urban area with Kidsgrove separated by the Green Belt, Kidsgrove has not been defined as a ‘large built up area’. No settlements within neighbouring authorities have been defined as ‘large built up areas’.

The guidance provided at paragraph 005 of PPG has been used to determine the criteria applied to assess this purpose as set out in the ‘Key Question to Consider’ above.

2.5.3.3 Purpose B: Prevent neighbouring towns merging into one another

Table 7. Purpose B Method

Definitions for Purpose B
<p>Neighbouring towns – within Stoke-on-Trent, this has been defined as the Stoke-on-Trent urban area (this includes Burslem, Fenton, Hanley, Longton, Meir, Stoke, Tunstall). There are also a number of relevant towns within neighbouring authorities:</p> <ul style="list-style-type: none"> • Within Newcastle-under-Lyme, this has been defined as Kidsgrove; • Within Staffordshire Moorlands, this has been defined as Biddulph and Cheadle; and • Within Stafford, this has been defined as Stone. <p>Merging – combining to form a single entity (Oxford English Dictionary)</p>

Approach to the Assessment

A desk and field-based assessment was applied to this purpose.

Table 8. Purpose B Method

Key Questions to Consider	Recommended Approach
1. Is this site located in a gap between two or more defined neighbouring towns?	If yes , describe which towns and proceed to Question 2... If no , conclude site makes no contribution to purpose b
2. What role does the site play in separating the neighbouring towns and how would development impact this?	Describe existing gap between the neighbouring towns based on the following: <ul style="list-style-type: none"> • Strong contribution – Site forms a substantial part of the gap between towns where development would significantly either visually or physically reduce the perceived or actual separation between towns and/or result in merging. • Moderate contribution – Site forms part of the gap or a small part of the gap between towns where there is scope for some development without reducing the visual, physical and/or perceived separation between the towns. • Weak contribution – Site forms a very small part of the gap between towns where development would not have any impact on the visual, physical or perceived separation between the towns.
Overall assessment: What level of contribution does the site make to purpose b?	Apply scoring system based on the above: No / Weak / Moderate / Strong contribution

Justification for the Approach

Given that the terminology of the purpose specifically refers to the ‘neighbouring towns’, it is important to define this. Paragraph 005 of PPG confirms that this purpose ‘relates to the merging of towns, not villages.’

The North Staffordshire Green Belt Local Plan set out the established aims of the North Staffordshire Green Belt and lists a number of towns and settlements which it aims to prevent merging, as set out in the table below. The previous Joint Green Belt Assessment Part 1 (November 2017) used all of these settlements in assessing purpose b noting that this list includes various towns, villages and settlements and not all of these places would properly be defined as ‘towns’.

Table 9. Settlements listed in the North Staffordshire Green Belt Local Plan

Stoke-on-Trent	Newcastle-under-Lyme	Staffordshire Moorlands	Stafford
Baddeley Edge/Light Oaks Norton Green	Alsagers Bank Audley Betley Bignall End Halmerend Kidsgrove Madeley Madeley Heath Miles Green Wood Lane	Bagnall Biddulph Blythe Bridge Brown Edge Caverswall Cellarhead Cheadle Cheddleton Cookshill Dihorne Endon Folly Lane Forsbrook Kingsley Kingsley Holt Longsdon Stanley Stanley Moor Werrington Wetley Rocks	Barlaston Fulford Meir Heath Oulton Stone Tittensor

As such, given the updated guidance provided by PPG, only the ‘towns’ and not ‘villages’ within this list are now considered relevant to this purpose, alongside the Stoke-on-Trent urban area. Whilst it is acknowledged that the Stoke-on-Trent urban area is not a ‘town’, the towns within it form a contiguous urban area and therefore it is necessary to treat it as one. The guidance in PPG does not preclude settlements which are larger than towns being included. The potential merging of the Stoke-on-Trent urban area with surrounding towns is therefore considered relevant to this purpose.

For Stoke-on-Trent, the settlements listed have been considered in Section 6 below to understand whether these settlements are villages. This concludes that Norton Green is a village with Baddeley Edge/Light Oaks not being considered a village. For Newcastle-under-Lyme, the Newcastle-under-Lyme Local Plan (Regulation 19) (July 2024) has been used to identify the relevant towns within the list below. Policy PSD2 (Settlement Hierarchy) notes that Kidsgrove is an urban centre with a town centre. Kidsgrove has therefore been defined as a town. Within Staffordshire Moorlands, the

Staffordshire Moorlands Local Plan (September 2020) has been used to identify the relevant towns within the list below. Policy SS 2 (Settlement Hierarchy) describes Biddulph and Cheadle as towns. Within Stafford, the Stafford Borough Local Plan 2020-2040 (Preferred Options) has been used to identify relevant towns. Policy 2 (Settlement Hierarchy) identifies Stone as a market town and second principal town. Based on this, the following settlements from the table below have been identified as ‘towns’ which are relevant to this study: Kidsgrove, Biddulph, Cheadle, and Stone.

The guidance provided at paragraph 005 of PPG has been used to determine the criteria applied to assess this purpose as set out in the ‘Key Question to Consider’ above.

2.5.3.4 Purpose C: To assist in safeguarding the countryside from encroachment

Table 10. Definitions for Purpose C

Definitions for Purpose C
<p>Safeguarding - Protect from harm or damage with an appropriate measure (Oxford English Dictionary).</p> <p>Countryside – The land and scenery of a rural area that is either used for farming or left in its natural condition (Oxford English Dictionary and Cambridge Dictionary).</p> <p>Encroachment - a gradual advance beyond usual or acceptable limits (Oxford English Dictionary).</p>
<p>Definitions for the Approach</p> <p>Built form – any form of built development excluding development that falls within one of the exception categories in paragraph 154 NPPF (i.e. it is not deemed to be inappropriate development in the Green Belt, for example buildings for agriculture and forestry).</p> <p>Openness – the visible openness of the Green Belt in terms of the absence of built development, a topography which supports long line views and low levels of substantial vegetation. Consider both actual distance (the distance between settlement and countryside) and perceived distance (e.g. a wooded area located between a new development and the settlement would not impact upon the perception of openness from the settlement). Openness should be assessed from the edge of the settlement/inset boundary outwards, with reference to the matrix set out in Table 12 below.</p> <p>Rural land uses – this includes agricultural land, forestry, woodland, shrubland/scrubland and open fields. There may be limited and dispersed built development and man-made structures, such as detached residential buildings and rural hamlets.</p> <p>Settlement – all settlements that are inset from the Green Belt (this includes the large built-up-area).</p> <p>Urbanising influences – existing development such as residential or commercial development, however not including development that falls within one of the exception categories in paragraph 154 NPPF (i.e. it is not deemed to be inappropriate development in the Green Belt, for example buildings for agriculture and forestry).</p>

Approach to the Assessment

A desk and field-based assessment was applied to this purpose.

Table 11. Purpose C Method

Key Questions to Consider	Recommended Approach
1. Does the site consist of open countryside?	<p>Describe existing land use(s) (e.g. open countryside, agricultural land, residential, mix of uses) based on the following:</p> <ul style="list-style-type: none"> • Strong contribution – The site consists of open countryside and/or rural land uses. • Moderate contribution – The site partly consists of open countryside and/or rural land uses however it also includes some semi-urban land uses. • Weak contribution – The site consists of urban or semi-urban development and land uses. • No contribution – The site is developed and consists of urban land uses.
2. Does the site have a sense of openness?	<p>Describe existing encroachment within the site and degree of openness taking into account built form, vegetation and topography using matrix below in Table 12, based on the following:</p> <ul style="list-style-type: none"> • Strong contribution – The site has a strong degree of openness. • Moderate contribution – The site has a strong-moderate or moderate degree of openness. • Weak contribution – The site has a moderate-weak or weak degree of openness. • No contribution – The site has no degree of openness.
3. Are there any surrounding urbanising influences which impact upon openness?	<p>Describe surrounding uses based on the following:</p> <ul style="list-style-type: none"> • Strong contribution – The site is surrounded by open countryside along most of its boundaries. • Moderate contribution – The site is partly enclosed by existing development or a by a settlement along some of its boundaries impacting the sense of openness. • Weak contribution – The site is completely enclosed by existing development or by a settlement along a number of boundaries impacting the sense of openness.
Overall assessment: What level of contribution does the site make to purpose c?	<p>Bring together all conclusions from above to determine overall assessment. Professional judgement should be applied in determining the overall assessment as a site with significant existing development within it or a site with no</p>

Key Questions to Consider	Recommended Approach
	<p>degree of openness will make no contribution to this purpose regardless of the other considerations.</p> <p>Apply scoring system:</p> <p>No / Weak / Moderate / Strong contribution</p>

Table 12: Degree of Openness Matrix

Built Form	Long-line views	Vegetation	Degree of Openness
Less than 10%	Open long line views	Low vegetation	Strong degree of openness
Less than 10%	Open long line views	Dense vegetation	Strong-moderate degree of openness
Less than 10%	No long line views	Low vegetation	Strong-moderate degree of openness
Less than 10%	No long line views	Dense vegetation	Moderate degree of openness
Less than 20%	Open long line views	Low vegetation	Strong-Moderate degree of openness
Less than 20%	Open long line views	Dense vegetation	Moderate-Weak degree of openness
Less than 20%	No long line views	Low vegetation	Moderate degree of openness
Less than 20%	No long line views	Dense vegetation	Weak degree of openness
Between 20 and 30%	Open long line views	Low vegetation	Moderate-Weak degree of openness
Between 20 and 30%	Open long line views	Dense vegetation	Weak degree of openness
Between 20 and 30%	No long line views	Low vegetation	Weak degree of openness
Between 20 and 30%	No long line views	Dense vegetation	No degree of openness
More than 30%	Open long line views	Low vegetation	Weak degree of openness
More than 30%	Open long line views	Dense vegetation	No degree of openness
More than 30%	No long line views	Low vegetation	No degree of openness

Built Form	Long-line views	Vegetation	Degree of Openness
More than 30%	No long line views	Dense vegetation	No degree of openness

Justification for the Approach

The comparative review in Section 2.3 demonstrates that the assessment of this purpose includes a range of factors. The new NPPF and updated PPG does not provide any further guidance on the assessment of this purpose. As such, the approach originally adopted in the Joint Green Belt Assessment Part 1 (November 2017) remains robust and has largely been retained with the exception of the consideration of boundaries having been removed due to this now being considered as part of purpose a and to avoid duplication in assessing this. The justification for the approach is repeated here for completeness.

This purpose applies to all Green Belt land, whether adjacent to a large built-up area, an inset settlement or a settlement within neighbouring authorities. Given the focus on the open countryside, the ‘degree of openness’ of the site is a key factor to consider within the approach, albeit it is one of a number of factors. The matrix above therefore enables an assessment of this to be carried out. The matrix is intended to guide this assessment, and it may not strictly apply to all sites, thus a level of professional judgement must be applied.

Both the matrix and the definition of openness set out in the definition box captures the consideration of both visual openness and spatial openness. Visual openness refers to the perception of openness which may be impacted by topography, views and vegetation. Spatial openness relates to the level of built form and the type of built form (for example agricultural or forestry uses). The case of *Turner* [2016] EWCA Civ 466 confirms that both factors 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...*”

The recommended approach set out above takes the position that sites which are well connected to the open countryside along a number of boundaries make a higher contribution to safeguarding the countryside from encroachment given their relationship to the countryside. However, the presence of existing built form within the site can alter this level of contribution. The definition of built form set out above does not include buildings for agriculture and forestry given that these are not considered to be ‘inappropriate development’ regardless of their impact upon openness, according to paragraph 154 of the NPPF.

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

Table 13. Definitions for Purpose D

Definitions for Purpose D
<p>Historic Town – within Stoke-on-Trent, this has been defined as the Stoke-on-Trent urban area. There are also a number of relevant historic towns within neighbouring authorities:</p> <ul style="list-style-type: none">• Within Newcastle-under-Lyme, this has been defined as Kidsgrove; and• Within Staffordshire Moorlands, this has been defined as Biddulph.
<p>Definitions for the Approach</p> <p>Historic Core – within Stoke-on-Trent, this is defined as Stoke Town Centre Conservation Area, Hanley Conservation Area, and Burslem Conservation Area. Within Newcastle-under-Lyme, this is defined as Kidsgrove Conservation Area. Within Staffordshire Moorlands, this is defined as Biddulph Conservation Area.</p> <p>Views – these are defined as those ‘important views’ shown in the Council’s Conservation Area Appraisals on the Townscape Appraisal Maps (for Stoke-on-Trent).</p> <p>Existing development – any form of built development except where it falls within one of the exception categories in paragraph 154 NPPF (i.e. it is not deemed to be inappropriate development in the Green Belt, for example buildings for agriculture and forestry).</p>

Approach to the Assessment

A desk-based assessment only was applied to this purpose.

Table 14. Purpose D Method

Key Questions to Consider	Recommended Approach
1. Does the site have a relationship with a defined ‘historic town’?	<p>Describe whether the site is located adjacent to a historic town. If site is adjacent, continue to Question 2.</p> <p>If the site is not adjacent, does the site provide views into/out of a historic town? (see Conservation Area Appraisals).</p> <p>If site is not adjacent to, or provide views into/out of a historic town, conclude the site makes no contribution to this purpose.</p>
2. Does the site have a connection or relationship to the historic core of the historic town?	<p>Describe whether there is a connection or relationship between the site and the historic town, particularly the historic core (see Conservation Area Appraisals) based on the following:</p> <ul style="list-style-type: none">• Strong contribution – The site forms part of the setting of the historic town and it makes a considerable contribution to the special character of

Key Questions to Consider	Recommended Approach
	<p>the historic town (for example, due to its important views between the site and the historic core).</p> <ul style="list-style-type: none"> • Moderate contribution – The site forms part of the setting of the historic town and/or it makes a contribution to the special character of the historic town (the site's contribution may be impacted by separation from the historic core as a result of existing development or topography and/or views between the site and the historic core being broken and/or constrained by development or topography and/or existing development located within the site). • Weak contribution – The site does not form part of the setting of the historic town and/or it has no visual, physical, or experiential connection to the historic core (for example, due to it being a significant distance away) and/or the site contains significant existing development.
Overall assessment: What level of contribution does the site make to purpose d?	<p>Apply scoring system based on the above:</p> <p>No / Weak / Moderate / Strong contribution</p>

Justification for the Approach

Given that the terminology of the purpose specifically refers to 'historic towns' it is necessary to define this. This approach is consistent with the comparative review in Section 2.3 where most authorities defined historic town for the purposes of the study. Paragraph 005 of PPG confirms that this purpose 'relates to historic towns, not villages.' It also states that: "*Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.*"

Unlike cities such as Chester and York, Stoke-on-Trent is not commonly thought of as a 'historic town'. However given the interim conclusions drawn by the Inspector regarding the Cheshire East Local Plan Strategy (December 2014) where the Inspector stated that there were "...*several shortcomings with the evidence itself*", as the Green Belt Assessment 2013 "...*does not consider all the purposes of the Green Belt, omitting the contribution to urban regeneration and preserving the setting and special character of historic towns*" (para 85), it is considered important and necessary to assess this purpose.

As part of the previous Joint Green Belt Assessment Part 1 (November 2017), the 'historic towns', were defined by cross referencing the 'neighbouring towns' defined for purpose b against the Conservation Areas within the relevant authorities. The Conservation Area Appraisals were then reviewed in order to determine whether these towns should be included within the assessment of purpose d.

Based on the updated approach to purpose b and the 'neighbouring towns' identified, the following 'historic towns' are therefore relevant based on their proximity to the Stoke-on-Trent Green Belt: the Stoke-on-Trent urban area, Kidsgrove and Biddulph.

As set out in purpose b, it is acknowledged that the Stoke-on-Trent urban area is not a ‘town’ however given it is a contiguous urban area which encompasses a number of towns, for the purposes of the assessment, it has been defined as a ‘historic town’. As such it is necessary to consider what represents the historic core of Stoke-on-Trent. Within Stoke-on-Trent, there are a number of Conservation Areas, and these have been reviewed in the table below to determine which of these represents the historic core.

Table 15. Conservation Areas within Stoke-on-Trent

Name	Date of designation	Notes from Conservation Area Appraisal	Include within assessment of purpose d?
Stoke Town Centre Conservation Area	1972 (extended 2010)	This incorporates the former St Peters Churchyard Conservation Area. The 2014 Appraisal notes that Stoke lies at the point where a Roman road crosses the confluence of the River Trent and Fowlea Brook. Throughout the Medieval period the settlement consisted only of the church and rectory. The church itself is first mentioned in the Domesday Book of 1086. The dense urban development which now surrounds the Conservation Area means that there are no views out of the town from the Green Belt.	Yes - represents historic core of Stoke.
City Centre Conservation Area, Hanley	1993	The 2010 Appraisal states that the earliest written record of Hanley dates from 1212 however urban development did not take place in Hanley until the later 18th century. Medieval occupation was centred on Shelton along Broad Street and Marsh Street to the west of the Conservation Area and around the Old Hall manor house to the east, joined by Old Hall Street and Albion Street which runs through the conservation area. There is, however, no excavated evidence of these medieval origins within the Conservation Area. Most of the archaeology within the conservation area is related to the pottery industry which developed in Hanley from the end of the 17th century. The Appraisal notes the long distance views to the surrounding rural topography such as from Parliament Square out towards Werrington, which relates to the Green Belt.	Yes – due to views of Conservation Area from Green Belt
Burslem Town Centre	1972 (extended	The 2011 Appraisal states Burslem is located on natural deposits – ironstone, clay and coal –	Yes – due to views of

Name	Date of designation	Notes from Conservation Area Appraisal	Include within assessment of purpose d?
Conservation Area	1986, 2004, 2005)	which provided the raw materials for pottery making. The Conservation Area is rich in archaeological sites relating to the town's past as a centre of pottery production. Archaeological evidence indicates that this industry flourished from at least the 15th century. The Appraisal highlights the notable long views and vistas from the West making parts of the Conservation Area and landmarks visible from key distant vantage points including the A500 which includes the Green Belt.	Conservation Area from Green Belt
Hanley Park Conservation Area	1997	The 2013 Appraisal states the heritage value in Hanley Park is primarily in its value as a historic park listed Grade 2 on the English Heritage Register of Parks and Gardens. There are limited views outside of the park.	No – relates to Hanley Park only.
Victoria Park Conservation Area, Tunstall	2001	The 2007 Appraisal states that the Conservation Area is centred around the Victorian park of the same name and includes semi-detached residential properties of a similar age to the park. The whole of the park is designated an area of archaeological importance and the park is also on the historic parks register as a grade II park. The majority of houses adjacent to the park were built between 1900 and 1924 with the rest following quickly after. The Appraisal notes that there are significant internal views however views of quality out of the Conservation Area are limited.	No – relates to Victoria Park only.
Tower Square Conservation Area, Tunstall	1988	The 2007 Appraisal notes that Tower Square (formerly Market Square) is at the heart of Tunstall Town Centre and dates back to the early 1800's. Tower Square has been the centre of commerce for Tunstall since its inception. The Conservation Area is dominated by retail and commercial uses, with few residential properties. The Appraisal notes that there are significant internal views however views of quality out of the Conservation Area are limited.	No – relates to the commercial and retail core dating back to 1800.

Name	Date of designation	Notes from Conservation Area Appraisal	Include within assessment of purpose d?
Park Terrace Conservation Area, Tunstall	1988	The 2007 Appraisal states that the Conservation Area is predominantly residential in character, consisting of mostly terraced houses with a small number of detached properties. Originally a small settlement within the Manor of Tunstall, Tunstall town centre was planned and created during the early nineteenth century. The Conservation Area has had a majority of residential properties housing workers for the local industries of tile making, mining and potteries. The Appraisal notes that there are significant internal views however views of quality out of the Conservation Area are limited.	No – relates to area of residential properties near to town centre.
Hitchman Street Conservation Area, Fenton	1990	The 2008 Appraisal states that the Conservation Area is a group of thirteen houses and one shop, dating from 1889. These dwellings were completed in 1890 and this is recorded by a date stone in the façade facing Victoria Road which also bears the monogram “WMB”. (William Meath Baker - the owner of an adjacent pottery). The Appraisal notes that views of quality out of the area are limited.	No – relates to area of residential properties.
Victoria Place Conservation Area, Fenton	1990	The 2008 Appraisal states that the Conservation Area is a group of fifteen houses and one restaurant/public house, dating from 1885. These dwellings are survivors from a larger group of thirty houses; a row of 14 houses facing City Road, were demolished in 1997 because they were in such a poor state of repair. The Appraisal notes that views of quality out of the area are limited.	No – relates to area of residential properties.

The guidance provided at paragraph 005 of PPG has been used to determine the criteria applied to assess this purpose as set out in the ‘Key Question to Consider’ above. The proposed approach seeks to capture whether the site has a role in preserving the setting and special character of the historic town by reference to the historic core (the Conservation Area) and as evidenced by the Conservation Area Appraisal.

The assessment is intended to be high level and proportionate to a Green Belt assessment. It is not intended to provide an in-depth assessment of all designated heritage assets or the historic environment as this would form part of a later stage site appraisal, if required.

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

Approach to the Assessment

Apply ‘moderate contribution’ to all sites.

Justification for the Approach

The comparative review in Section 2.3 shows that a number of authorities continue to follow the approach in 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 e from the assessment. Where authorities have chosen to do this and have set out their justification for this, Inspectors have accepted this. Other authorities have chosen to apply a blanket level of contribution to this purpose which Inspectors have also deemed to be acceptable. Other authorities have chosen to apply a blanket level of contribution to this purpose which Inspectors have also deemed to be an acceptable. . The new NPPF and updated PPG does not provide any further guidance on the assessment of this purpose. As such, the approach originally adopted in the Joint Green Belt Assessment Part 1 (November 2017) remains robust and has been retained. The justification for the approach is summarised here for completeness.

In light of the Cheshire East Inspectors’ Interim and Further Views, purpose e has been included within the methodology, taking a pragmatic approach. This ensures that each of the purposes is considered and given equal weighting in the overall assessment of Green Belt purposes. The approach taken in the Cheshire East Council Green Belt Assessment was to consider the potential for regeneration by looking at the undeveloped brownfield supply set out in the Urban Potential Study and then comparing this to the total settlement size in order to get a percentage of brownfield urban potential. Applying this same approach in the Stoke-on-Trent context would present a number of difficulties due to the external factors at play in Stoke-on-Trent including the viability and developability of brownfield sites and other barriers to development. Furthermore, the scale and complexity of the urban form and Green Belt in Stoke-on-Trent means that a spatial analysis based on the supply of brownfield land relative to the locations of individual Green Belt sites would be unrealistic and based on significant assumptions. It is therefore not possible to assess whether one site makes a greater or lesser contribution to encouraging the development of previously developed land. On this basis, all sites make an equal contribution to this purpose.

The full explanation on the evolution of the approach to purpose e is provided in Appendix C of the Joint Green Belt Assessment Part 1 (November 2017). In light of the available data and the division of the SHMA sub-areas, it was decided by officers at the Council that a blanket assessment of purpose e should be applied. The level of contribution was deemed to be ‘moderate’ given that the percentage of brownfield urban potential for the combined Stoke-on-Trent SHMA sub-areas was moderate.

2.5.3.7 Overall Assessment

The purpose of the overall assessment is to consider the outcomes of each of the five purposes and then make a judgement on the overall contribution the site makes to the Green Belt.

The same qualitative scoring system as applied to each of the five purposes was also applied to the overall assessment, as set out below:

Table 16. Green Belt Purposes: Overall Assessment

Level of contribution	Description
Strong contribution	The site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt would detrimentally undermine this purpose
Moderate contribution	The site contributes to a few of the elements of the Green Belt purpose however does not fulfil all elements
Weak contribution	The site makes a limited contribution to an element of the Green Belt purpose
No contribution	The site makes no contribution to the Green Belt purpose

In order to ensure a consistent and transparent approach, the following guidance was used in determining the overall assessment:

- No sites should be assessed as ‘no contribution’ overall unless each of the five purposes is assessed as a ‘no contribution’.
- Where there was a 4 / 1 split – the majority contribution should always be applied, unless the majority is ‘no contribution’ in which case, the overall should be ‘weak’.

Example:

Moderate	Moderate	Moderate	Moderate	No	Moderate
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Exception:

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

Example:

Moderate	Moderate	Moderate	Weak	Weak	Moderate
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Exception:

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

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

Example:

Moderate	Moderate	Moderate	Strong	Weak	Moderate
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Exception:

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

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

Example:

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

Exception:

Moderate	Strong	Moderate	No	No	Apply professional judgement
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Where 2 purposes are the same and the remaining 3 are all different application of professional judgement would be required.

Example:

Weak	Weak	No	Moderate	Strong	Apply professional judgement
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Applying Professional Judgement

Whilst all five Green Belt purposes should be given equal weighting, the overall assessment is not intended to be a numbers balancing exercise and a certain level of professional judgement must be applied to all of the above rules and particularly where one of the purposes is assessed as ‘strong’.

In order to do this, it is necessary to refer back to the overall aim and purpose of Green Belt as set out in paragraph 142 of the NPPF:

“The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Paragraph 142 refers to the prevention of ‘urban sprawl’ and keeping land permanently open. These aims are fundamentally subsumed within Purposes a, b and c and thus where the development of a site would particularly threaten these purposes additional weight should be applied to its contribution to Green Belt purposes. This is matter for the professional judgement of the assessor

however the justification for the assessment should provide a transparent explanation behind their reasoning.

2.5.4 Step 3: Identification of provisional grey belt

Annex 2 of the revised NPPF defines grey belt as ‘...land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Paragraph 148 requires the need to promote sustainable patterns of development to be taken into account when drawing up or reviewing Green Belt boundaries.’

This stage of the methodology focuses on the second part of the definition of grey belt – Green Belt land that does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. In relation to the exclusion of areas or assets in footnote 7 (other than Green Belt) which would provide a strong reason for refusing or restricting development, a full assessment against footnote 7 designations will be undertaken by the Council at the next stage. As such, the grey belt identified is considered to be ‘provisional grey belt’.

The Green Belt purpose assessment framework set out in the section above sets out the methodology to undertake an assessment against the purposes. In order to identify grey belt, the outcomes of the assessment against purpose a, b and d have been taken into account, as shown in the table below. The outcomes for the assessment against Purpose c and e are not relevant to the identification of grey belt, nor is the overall assessment outcome.

Table 17. Interpretation of the purpose assessment outcomes to identify provisional grey belt

Purpose A	Purpose B	Purpose D	Is the site provisional grey belt?
Moderate / Weak / No contribution	Moderate / Weak / No contribution	Moderate / Weak / No contribution	Yes
Strong contribution	Strong contribution	Strong contribution	No
Strong contribution	Moderate / Weak / No contribution	Moderate / Weak / No contribution	No
Moderate / Weak / No contribution	Strong contribution	Moderate / Weak / No contribution	No
Moderate / Weak / No contribution	Moderate / Weak / No contribution	Strong contribution	No

2.5.5 Step 4: Green Belt Impact Methodology

This stage considers the implications of releasing the site from the Green Belt (in terms of any harm to the function and integrity of the remaining Green Belt), and the resultant Green Belt boundary. The methodology for this stage is largely based on the Green Belt Site Review Methodology (December 2020) given this remains applicable and relevant. However this stage of the assessment

now applies to all sites and not just those sites that make an overall weak or moderate contribution to Green Belt purposes, as per the Green Belt Site Review methodology. This change is required due to the way grey belt has been defined.

The findings from the comparative review in Section 2.3 and Appendix A demonstrated that most local authorities considered the site's existing contribution to Green Belt purposes as well as the impact on the remaining Green Belt of removing the site, alongside any potential cumulative impacts.

There is no recognised approach as to how this should be assessed, and the comparative review demonstrated that most authorities simply applied a brief commentary referencing Green Belt purposes. Table 16 below therefore sets out the qualitative criteria which were used in the assessment:

Table 18. Qualitative assessment criteria to consider Green Belt implications

Key Question to Consider	How will this be assessed?
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	<p>This assessment will draw on the definitions and approach set out in the Green Belt Purpose Assessment Framework (see Section 2.5.3 above) however it will consider <i>how development of the site would impact</i> upon the purposes instead of <i>how the site in its existing state contributes</i> to the purposes:</p> <p>Purpose a – would development of the site represent unrestricted sprawl?</p> <p>Purpose b – would development of the site result in the merging of neighbouring towns or increase the potential for merging?</p> <p>Purpose c – would development of the site represent an encroachment into the countryside?</p> <p>Purpose d – would development of the site impact upon the setting or character of a historic town?</p> <p>As Purpose e relates to the role of the Green Belt in encouraging urban regeneration, it will therefore not be assessed.</p>
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?	<p>Consider the following:</p> <ul style="list-style-type: none"> • Would the surrounding Green Belt continue the perform the same Green Belt function and purposes? (e.g. where the surrounding Green Belt becomes isolated or islanded as a result of the site being removed it would no longer perform the same Green Belt function and purposes). • Has the removal of the site increased or decreased the importance of the surrounding Green Belt to certain purposes? (e.g. where the site in question forms part of a gap between neighbouring towns, the importance of the surrounding Green Belt may be increased if that site is removed).

Key Question to Consider	How will this be assessed?
Are there any cumulative impacts (due to release of sites in close proximity)?	This will only be relevant if a number of sites in the same area are recommended for further consideration. The cumulative impacts should apply the same considerations as above taking all sites together.
Conclusion	A summary will be provided which will conclude on the Green Belt impact as follows: <ul style="list-style-type: none"> • Removal of the site will harm the function or integrity of the Green Belt – recommendation: exclude site from process. • Removal of the site will not harm the function or integrity of the Green Belt – recommendation: take site forward for further consideration.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent? (Note: this is descriptive only and does not contribute to the conclusion on Green Belt impact)	Description of the resultant Green Belt boundary. If the resultant boundary features are not recognisable and permanent, it is recommended that if the site is taken forward, the accompanying policy will need to specifically state that a recognisable and permanent new Green Belt boundary must be provided or the existing boundary requires strengthening.

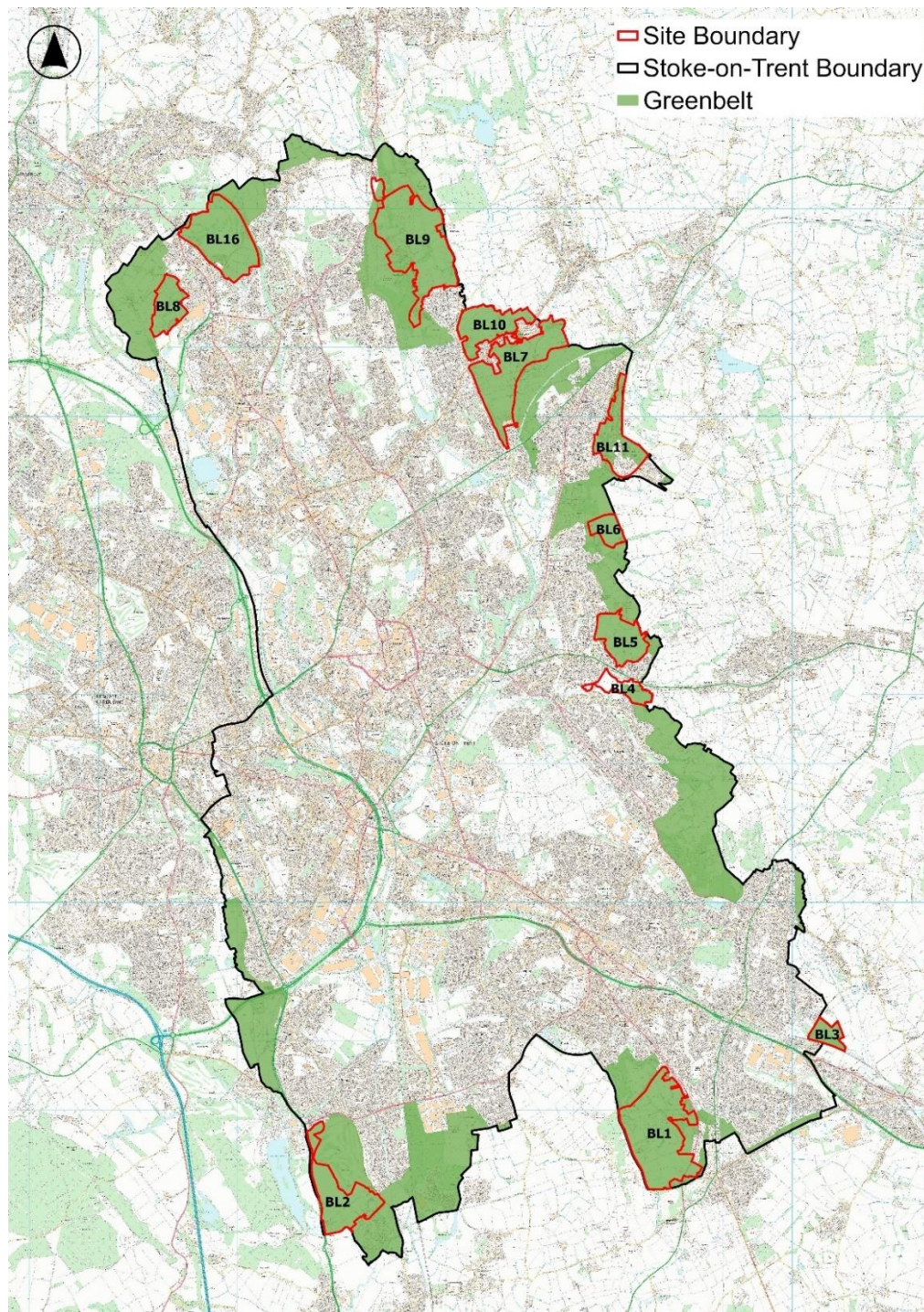
If it was concluded that removing the site (or sites, if cumulative) from the Green Belt will harm the function and integrity of the Green Belt, it was recommended that the site is excluded from the process. On the other hand, if it was concluded that removing the site will not harm the function and integrity of the Green Belt, it was recommended that the site is taken forward for further consideration by the Council.

3. Green Belt Site Assessments

3.1 Overview

This section sets out the findings of the Green Belt site assessments applying the methodology in Section 2. In total, 12 sites were assessment. These sites are shown in the figure below which is also included in Appendix B.

Figure 2. Green Belt Sites Assessed



3.2 Assessment Findings

The detailed site proformas can be found in Appendix C and a summary of the assessment findings is set out in the table below.

Table 19. Green Belt Site Assessment Findings

Site Ref	Green Belt Purpose Overall Assessment	Is the site provisional grey belt?	Green Belt Impact Assessment Conclusion
BL1	Moderate contribution	Yes	Take site forward for further consideration
BL2	Moderate contribution	Yes	Take site forward for further consideration
BL3	Moderate contribution	Yes	Take site forward for further consideration
BL4	Moderate contribution	Yes	Take site forward for further consideration
BL5	Moderate contribution	Yes	Take site forward for further consideration
BL6	Moderate contribution	Yes	Take site forward for further consideration
BL7	Moderate contribution	Yes	Take site forward for further consideration
BL8	Moderate contribution	Yes	Take site forward for further consideration
BL9	Moderate contribution	Yes	Take site forward for further consideration
BL10	Moderate contribution	Yes	Take site forward for further consideration
BL11	Weak contribution	Yes	Take site forward for further consideration
BL16	Strong contribution	No	Exclude site from process

3.3 Summary

The assessment findings should be used to inform decision making alongside other evidence as part of the Council's site selection process. As set out previously, recommendations to 'take site forward for further consideration' or 'exclude site from process' does not imply that a site will or won't be released from the Green Belt. It is up to the Council to choose whether or not to accept the recommendations.

In taking sites forward for further consideration, the Council will need to apply the new sequential approach to Green Belt release, as set out in paragraph 148 NPPF (requiring consideration of previously developed Green Belt land first, followed by grey belt which is not previously developed, and then other Green Belt locations, and at all stages taking into account the need to promote sustainable patterns of development).

4. Exceptional Circumstances Case Review

4.1 Overview

This section provides a review of the Council's exceptional circumstances case. This represents an update to the previous 'Exceptional Circumstances Review' (November 2019) forming part of the Green Belt Assessment Part 2. It considers national policy and guidance and considers the approaches taken by other local authorities with recently adopted Local Plans. A review of the Council's emerging evidence base is undertaken.

It is acknowledged that the Council is still in the process of preparing the evidence which will feed into the exceptional circumstances case however this section reviews the evidence which is currently available and considers this against national policy, case law and good practice. The review focuses on whether sufficient information is likely to have been provided to build the exceptional circumstances case and provides recommendations on additional information required. It does not question the validity, or the accuracy of the studies referred to.

4.2 National Policy and Guidance

4.2.1 National Policy Context

Paragraph 145 of the NPPF sets out the requirement for exceptional circumstances to be fully evidenced and justified. It states:

*“Once established, **Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified** through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.” (emphasis added)*

Paragraph 146 is a new addition in the current NPPF, and it explicitly recognises that the identified need for homes, commercial or other development represents an exceptional circumstance. This is already well established in case law and therefore does not represent a change in approach.

Paragraph 146 recognises that identified need is one factor which could be relevant, but it does not provide an exhaustive list of other relevant factors. Paragraph 146 does introduce a new 'fundamentally undermine' test linked to the outcomes of a Green Belt review. Paragraph 146 states:

“Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”

Paragraph 147 provides guidance on how to demonstrate that exceptional circumstances exist. It states:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should **be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development**. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy:*

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.” (emphasis added)*

Paragraph 148 sets out further requirements which local planning authorities need to consider when reviewing Green Belt boundaries and as part of their site selection process and which will need to be evidenced as part of the strategic and site-specific exceptional circumstances case:

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making 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.”

Paragraph 149(f) notes that when defining Green Belt boundaries, plans should: “...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

4.2.2 Guidance

PPG does not provide any further guidance in relation to exceptional circumstances.

4.2.3 Case Law

There are a number of legal challenge cases which assist in determining what may constitute an exceptional circumstance.

One of the most established cases is *Gallagher Homes Limited v Solihull Metropolitan Borough Council* [2014] EWHC 1283. This case was determined under the 2012 NPPF and made the following points:

- Planning guidance is a material consideration for plan-making and decision taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies;
- The test for redefining a Green Belt boundary has not been changed by the NPPF. However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans and has always required exceptional circumstances to do this;

- Exceptional circumstances are required for any revision to a Green Belt boundary, whether it is considering extending or diminishing the Green Belt; and
- Whilst each case is fact-sensitive and the question of whether circumstances are exceptional requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law. The Court can declare the adoption of a plan unlawful and quash it (or parts of it) if the plan-maker has failed to take a lawful approach to exceptional circumstances. This means that it is not enough for a local authority or inspector to assert that exceptional circumstances exist: it is not possible to convert unexceptional circumstances into exceptional circumstances simply by labelling them as such.

In addition, the *Gallagher Homes Limited* case also established that when considering whether to amend the boundary of the Green Belt, the starting point for every local authority is that this decision should only arise after all reasonable and acceptable efforts have been taken to maximise the amount of development within the urban area. Optimising densities and ensuring that all land is appropriately used must be the first response to growth. This would include a review of employment land and other areas or uses that are protected by planning policies, commensurate with ensuring the proper balance between residential, employment and other uses.

Gallagher Homes Limited established the principle that general planning merits cannot be exceptional circumstances: for example, it is not sufficient that the local authority consider that the relevant land would, or would not be, a sustainable location for development, or that they would have drawn the boundary line in a different place had they been starting from scratch. “*In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change and so the inclusion of the land in the Green Belt.*” (paragraph 130, *Gallagher Homes Limited v Solihull Metropolitan Borough Council* [2014] EWHC 1283)

The approach in *Gallagher Homes Limited* was followed by the case of *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078 which was also determined under the 2012 NPPF. This set out factors that ideally would be considered in identifying exceptional circumstances. These factors are as follows:

- i. the acuteness/intensity of the objectively assessed need.
- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development.
- iii. the consequent difficulties in achieving sustainable development without impinging on the Green Belt.
- iv. the nature and extent of the harm to this Green Belt.
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

It is noted that factors (i)-(iii) are more strategic in nature whilst (iv) and (v) are more site-specific considerations, albeit their cumulative impact is also relevant. At paragraph 54, the Judge notes that the Greater Nottingham Inspector considered the need for additional housing was acute, both generally and in this particular area, referring to paragraph 40 and 41 of the Inspector’s Report. At

paragraph 40 of the Greater Nottingham Inspector's Report (2014), the Inspector provides some general commentary about the Government's commitment to housebuilding and the requirements set out in the NPPF. At paragraph 41, the Inspector comments on the mismatch between housing supply and demand in Greater Nottingham.

In the more recent case of *Compton PC, Ockham PC & Cranwell v Guildford BC, SSHCLG & Ors* [2019] EWHC 3242 (Admin), it was emphasised that the demonstration of exceptional circumstances does not necessarily have to be complicated, requiring more than one individual exceptional circumstance. "*The 'exceptional circumstances' can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.*" Further planning needs, such as housing (ordinary or otherwise, irrespective of intensity of need) can form part of the judgement, even if it 'not necessarily sufficient of itself' and should be considered as part of wider analysis of, for example, sequentially preferable locations, Green Belt function and purpose, and advantages of the proposed location if released from the Green Belt.

The judgement outlines that 'exceptional circumstance' is an undefined policy concept requiring planning judgment to be made by the decision maker. The judgement further cautions that the *Calverton* list is not exhaustive nor a checklist against which exceptional circumstances should be demonstrated.

The *Compton PC v Guildford* case does not amount to an exhaustive list but provides a good starting point to demonstrating exceptional circumstances. The *Compton PC v Guildford* case also emphasised that the exceptional circumstances test is less stringent than the very special circumstances test applied to planning applications for development that would normally be considered inappropriate in the Green Belt.

4.2.4 Summary

The NPPF sets out the requirement for local planning authorities to demonstrate exceptional circumstances in order to alter Green Belt boundaries (paragraph 145). Paragraph 146 explicitly recognises that the identified need for homes, commercial or other development represents an exceptional circumstance although it does not list out any other relevant factors. Paragraph 147 requires local planning authorities to demonstrate that they have examined fully all other reasonable options for meeting identified need before concluding that exceptional circumstances exist.

There is no formal definition or criteria on what constitutes exceptional circumstances (beyond paragraph 146 in the NPPF) however the legal challenge cases of *Gallagher Homes Limited*, *Calverton* and more recently *Compton PC v Guildford* assist in the interpretation. The case of *Compton PC v Guildford* outlines that 'exceptional circumstance' is an undefined policy concept requiring planning judgment to be made by the decision maker.

There are a number of implications arising from the NPPF and the relevant case law on exceptional circumstances:

- The Council will need to demonstrate exceptional circumstances in order to alter Green Belt boundaries (paragraph 145).
- The Council will need to demonstrate that they have examined fully all other reasonable options for meeting identified needs before concluding exceptional circumstances exist, this includes:

- demonstrating they have made as much use as possible of suitable brownfield sites and underutilised land;
 - optimising the density of development; and
 - undertaking discussions with neighbouring authorities about whether they could accommodate some of the identified need, evidenced through the statement of common ground (paragraph 147).
- If the Council considers it necessary to release Green Belt land, the Council should consider the need to promote sustainable patterns of development and give first consideration to previously developed land, then grey belt which is not previously developed, and then other Green Belt locations land (paragraph 148).
 - In developing the exceptional circumstances case, the Council could consider the criteria set out in the *Calverton* case as a useful starting point however being mindful that this is not an exhaustive list nor a checklist, and therefore other considerations may be relevant, as confirmed by the *Compton PC v Guildford* case.

4.3 Approaches taken by other Local Authorities

4.3.1 Introduction

As there is no formal definition or criteria on what constitutes exceptional circumstances, it is useful to have an appreciation of how other local authorities have interpreted this requirement.

The approach to exceptional circumstances for the following ten local authorities has been reviewed:

- Broxbourne Borough Council
- Cheshire East Council
- Durham County Council
- Guildford Borough Council
- Runnymede Council
- South Oxfordshire Council
- St Helen's Council
- Stevenage Borough Council
- Warrington Borough Council
- Watford Borough Council

All of the authorities have been through Examination in Public and have had their Local Plan adopted within the past six years.

The table below includes a summary of the approach. Given the slight change in national policy in July 2018 due to the revised NPPF, as well as the new case law in 2019, it is relevant to note which version of the NPPF the Local Plans have been examined against and this is included below. A full

review table including relevant extracts from documents and links to document sources is included at Appendix C.

Table 20. Summary of approaches taken by other local authorities.

Local Authority	Arup Summary
<p>Broxbourne Borough Council</p> <p>Local Plan (June 2020)</p>	<p>The Local Plan was examined against the 2012 NPPF.</p> <p>The Council's exceptional circumstances case is set out in their Green Belt Topic Paper (June 2017). The principles set out in the <i>Calverton</i> judgement are used by the Council as the basis for their exceptional circumstances case. Each principle is considered and evidenced in turn.</p> <p>In the Local Plan Inspector's Report at paragraph 31, the Inspector notes that the consideration of whether there are exceptional circumstances reflects the approach set out in the "Calverton" High Court judgment. At paragraph 86-89, the Inspector gives particular emphasis to the fact that the current local plan was adopted about 15 years ago and only looked ahead to 2011 therefore it is of great importance that a new local plan is adopted for the Borough as soon as possible. The Inspector notes this is particularly important because of the constraints and uncertainties that would otherwise exist due to the highly restrictive Green Belt policies that would continue to apply to much of the land in the Borough. The Inspector notes that the Plan is based on reasonable estimates of needs and based on the available evidence, those needs are real and should be met in accordance with national policy. The Inspector notes that the Council has looked for development opportunities on non-Green Belt locations with all available opportunities for significant development in these locations having been proposed in the Plan. The Inspector concludes that the Council's evidence about the urban capacity of the Borough is proportionate. At paragraph 94-116, the Inspector then considers the Green Belt harm resulting from each of the proposed sites and whether each site would contribute to sustainable patterns of development.</p>
<p>Cheshire East Council</p> <p>Site Allocations Development Plan Document (December 2022)</p>	<p>The Site Allocations Development Plan Document (SADPD) was examined against the NPPF published in July 2021.</p> <p>The SADPD does not propose to alter Green Belt boundaries to accommodate development in the plan period although it included safeguarded land (see Appendix A). Policy PG 8 notes that housing development in the Local Service Centres (LSCs) will be addressed by windfall development. Although exceptional circumstances had previously been established in the adopted Local Plan Strategy (LPS) (2017), the Council decided that the release of Green Belt land was no longer required in the LSCs due to the growth in the housing land supply since the LPS was adopted.</p> <p>The Inspector agreed with the Council noting that the housing monitoring figures showed that the supply which had come forward from windfall sites had gone some way to meeting the needs of the LCSs. This suggested there was scope for further housing provision to come forward during the plan period to meet the needs of the LCSs without the need to alter Green Belt</p>

Local Authority	Arup Summary
	<p>boundaries. The Inspector concluded that exceptional circumstances do not now exist to justify the further alteration of Green Belt boundaries in the SADPD to meet the housing needs of the LSCs during the plan period.</p>
<p>Durham County Council</p> <p>Local Plan (October 2020)</p>	<p>The Local Plan was examined against the NPPF published in February 2019. The supporting text in the Local Plan at paragraph 4.93 sets out the exceptional circumstances. These can be summarised as:</p> <ul style="list-style-type: none"> • Ensuring sustainable patterns of development are achieved by building on Durham City's position as the regional centre. • Maximising the number of journeys undertaken by sustainable means to help address congestion and associated issues. • Providing the right type of housing to meet the needs of existing and future residents. • Helping address economic under-performance across the county by supporting the economic potential of Durham City. • Maximising the delivery of affordable housing and other infrastructure by locating development in the highest viability areas around Durham City. <p>The Council prepared a detailed Exceptional Circumstances report (2019) which considers the following factors: the local Green Belt context, road infrastructure within the Green Belt, the housing site methodology, how the Council has made effective use of brownfield sites and underused land, the density of development, and the potential to export need to neighbouring authorities. The report also considers other non-Green Belt land including towns and villages inset within the Green Belt and locations beyond the outer Green Belt boundary. The findings of the Green Belt assessments are also described as well as compensatory improvements.</p> <p>At the Local Plan Examination hearing session on Green Belt matters held in October 2019, the Inspector followed paragraph 137 of the 2019 NPPF requiring the Council to justify that they had made as much use as possible of suitable brownfield sites and underutilised land, optimised the density of development, and had discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. The Inspector particularly questioned the Council on their approach to considering options for locating growth in the towns and villages beyond the Durham City Green Belt and why they had concluded that this dispersed approach to development was not deemed to be sustainable. The Council had produced various evidence base documents including a Settlement Study and had assessed these options through a SHLAA criteria assessment, a high-level viability study and a sustainability appraisal. In relation to optimising density, the Inspector questioned whether the Council's proposed 30dph minimum was sufficiently ambitious to get the most out of the Local Plan allocations. The</p>

Local Authority	Arup Summary
	<p>Council explained that they had explored 40dph and directed the Inspector as to where they had evidenced this.</p> <p>In the Local Plan Inspector's Report, the Inspector considered the strategic level exceptional circumstances followed by the site-specific exceptional circumstances.</p>
<p>Guildford Borough Council</p> <p>Local Plan: Strategy and Sites (April 2019)</p>	<p>The <i>Compton PC v Guildford</i> case related to the adoption of the Local Plan: Strategy and Sites with the grounds of challenge relating to the release of sites from the Green Belt and the allocation of these sites for development.</p> <p>The Local Plan was examined against the 2012 NPPF.</p> <p>The Local Plan in the supporting text to the Green Belt policy (P2: Green Belt) at paragraph 4.3.17 states: "<i>We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.</i>"</p> <p>In the Local Plan Inspector's Report, the Inspector firstly considers whether strategic-level exceptional circumstances exist, considering a number of factors: the need for housing, business needs, land availability in the urban areas, and whether the quantity of development should be restricted having regard to footnote 9 of the NPPF (2012).</p> <p>The Inspector notes that Guildford has a pressing housing need with no scope for neighbouring authorities to accommodate any development due to them being significantly constrained and with Woking having additional unmet housing need. In terms of business needs, the Inspector states that the land available for additional business development in the urban area is very limited and there is no realistic alternative to releasing Green Belt land. In terms of housing, development opportunities within the urban areas have been thoroughly investigated as part of the Land Availability Assessment process. Guildford town centre is constrained due to conservation and flood risk issues.</p> <p>The Inspector states that there is no justification to restrict development based on footnote 9 commenting that the alterations to the Green Belt boundary would have a relatively limited impact on openness and would not cause severe or widespread harm to the purposes of the Green Belt.</p> <p>After concluding that strategic-level exceptional circumstances exist, the Inspector considers whether local-level exceptional circumstances exist on a site-by-site basis taking into account the findings from the Council's Green Belt and Countryside Study relating to the sensitivity of the site against the NPPF Green Belt purposes as well as the size of the site and its ability to contribute to the Borough's housing requirement.</p> <p>The Council's evidence base included a Green Belt and Countryside Topic Paper (2017) and a Green Belt and Countryside Study (volumes I-VI).</p>

Local Authority	Arup Summary
<p>Runnymede Council</p> <p>Local Plan (July 2020)</p>	<p>The Local Plan was examined against the 2012 NPPF.</p> <p>The Local Plan at paragraph 5.10 summarises the exceptional circumstances case:</p> <p><i>“The Council’s Exceptional Circumstances paper (January 2018 with April 2018 addendum) sets out the compelling reasons to return a number of Green Belt sites to the urban area through the Local Plan. These reasons primarily focus on the lack of suitable, available and achievable sites in the existing urban area, the significant level of constraints to development which exist in the Borough, the significant housing needs faced by Runnymede over the Local Plan period and the conclusion from DtC discussions carried out with partners to date which demonstrate that any unmet housing need from Runnymede is unlikely to be met in neighbouring or nearby Local Authority areas, at least in the early years of the plan period.”</i></p> <p>The Council produced two exceptional circumstances papers - one setting out the factors the Council considered as the exceptional circumstances to justify amendments to the Green Belt Boundary; the other provides local level exceptional circumstances for each proposed site allocation.</p> <p>The Local Plan Inspector’s Report at paragraph 42-54 comments on exceptional circumstances. The Inspector refers to the revised NPPF 2019 and the reasonable options test although notes that this was published after the submission of the Plan. However the Inspector states at paragraph 43:</p> <p><i>"43. Taking the material considerations and relevant case law into account, the Council has assessed all other reasonable options for meeting identified needs, working with neighbouring authorities in this process. It has provided robust, credible evidence demonstrating that brownfield opportunities including under used land and buildings, estates regeneration, optimisation of densities, and use of surplus public sector land are being pursued actively, continuously and effectively. This includes direct intervention through the acquisition and development of brownfield land in the town centres, recently implemented town centre regeneration schemes, and the proposed allocations and Opportunity Areas in the Plan.</i></p> <p>The Inspector notes that the Council has identified 5 key factors which amount to exceptional circumstances. These can be summarised as:</p> <p>The Borough being heavily constrained (by Green Belt, flood risk, and environmental designations).</p> <p>The pressing need to identify suitable land to house the Borough’s residents, together with employment and community facilities (including needs for gypsies, travellers and travelling showpeople).</p>

Local Authority	Arup Summary
	<p>The detailed Green Belt boundary having been established in 1986 with some parts of it being illogical, indefensible, or having discrepancies. In addition, national policy on washed over village has altered since 1986.</p> <p>A specific need having been identified for expansion of St Peter's Hospital, Chertsey making it necessary to review the boundary here.</p> <p>Neighbouring authorities being unable to help address the unmet needs of Runnymede.</p>
<p>South Oxfordshire Council</p> <p>Local Plan (December 2020)</p>	<p>The Local Plan was examined against the NPPF published in July 2018.</p> <p>The Local Plan designates eight strategic allocations, seven of which are on land to be released from the Green Belt. The site-specific exceptional circumstances are described in the supporting text to the strategic allocations.</p> <p>The Council's Green Belt evidence consisted of a number of Green Belt assessments. The Council did not prepare a Green Belt Topic Paper until after the submission of the Local Plan. The Green Belt Topic Paper (April 2020) uses the <i>Calverton</i> tests to demonstrate the strategic level exceptional circumstances. The report then considers the local level exceptional circumstances for each of the proposed allocations.</p> <p>The Local Plan Inspector's Report notes the requirement of paragraph 137 NPPF (July 2018) for the authority to demonstrate that it has examined fully all other reasonable options. At paragraph 86 the Inspector notes that the Council has considered these matters fully, stating:</p> <p><i>"Individually, or in combination, the various non-Green Belt alternatives involving, for example, more growth at the market towns, the villages, Didcot and/or Reading, or indeed a freestanding new settlement beyond the Green Belt, would have significant practical disadvantages over the chosen spatial strategy. They would not address needs where they arise, would be less able to address housing affordability issues, and would result in longer journey patterns, imposing additional journey to work costs on people who may already find housing costs challenging. The opportunities for regeneration that would arise from the Plan's spatial strategy would be lost. A spatial strategy driven principally by the need to avoid Green Belt release would not promote sustainable development and would not meet the Plan's objectives."</i></p> <p>At paragraph 88, the Inspector concludes:</p> <p><i>"Having regard to the significant level of housing need discussed in Issue 1, the need to maintain a delivery buffer ("headroom") to ensure the Plan is resilient, discussed in Issues 1 and 4, the range of factors discussed in this Issue, and the more detailed site analysis contained in Issue 3, exceptional circumstances exist for the release from the Green Belt of all the relevant site allocations. These exceptional circumstances extend to meeting employment</i></p>

Local Authority	Arup Summary
	<i>and social needs as well as housing needs on the strategic allocations in order to achieve balanced, sustainable and well-integrated development."</i>
<p>St Helen's Council</p> <p>Local Plan (July 2022)</p>	<p>The Local Plan was examined against the NPPF published in July 2021.</p> <p>The Local Plan at Policy LPA01 sets out the requirement to release land from the Green Belt to accommodate housing and employment needs. The supporting text at paragraph 4.3.8-4.3.14 sets out the strategic level exceptional circumstances case. In summary, the justification relates to:</p> <ul style="list-style-type: none"> • Ensuring that the housing and employment needs of St Helens are met in full within the Borough; • Insufficient capacity on suitable and available sites within urban areas; and • The lack of any scope to help meet the Borough's needs in any neighbouring district. <p>The supporting text also notes that the sites that have been removed from the Green Belt have been selected following a comprehensive Green Belt Review which had identified sites on the basis of their scope to be developed whilst minimising harm to the overall function of the Green Belt, and their suitability for development in other respects.</p> <p>The supporting text to the housing and employment allocation policies (Policy LPA03, LPA04 and LPA05) at paragraphs 4.9.22, 4.15.23 and 4.21.7 onwards articulate the site-specific exceptional circumstances justifying the removal of the allocations from the Green Belt on a site-by-site basis. The Inspector required a main modification to this supporting text as the site-specific exceptional circumstances were not sufficiently clear in the submission version of the Plan.</p> <p>The Council did not produce a separate exceptional circumstances case document or Green Belt Topic Paper however the evidence base consisted of a Green Belt Review (2018) and Developing the Spatial Strategy Background Paper (October 2020).</p>
<p>Stevenage Council</p> <p>Local Plan (May 2019)</p>	<p>The Local Plan was examined against the 2012 NPPF.</p> <p>The Local Plan in the supporting text to the Green Belt policy (Policy SP10: Green Belt) at paragraph 5.127 states:</p> <p><i>"There is no definition of 'exceptional circumstances' within the NPPF. However, it has been considered by the Courts. The recent Calverton judgement identifies criteria that should be taken into account when considering whether these circumstances exist. Our overarching approach to Green Belt review and consideration of these criteria is set out in a technical paper. We consider that the future development and regeneration needs of the Borough do provide the 'exceptional circumstances' that are required to alter Green Belt boundaries."</i></p>

Local Authority	Arup Summary
	<p>The Council produced a Green Belt Review and a Green Belt Technical Paper (2015) which sets out the strategic exceptional circumstances case focusing on the <i>Calverton</i> tests. The section of the Technical Paper relating to the nature and extent of harm to the Green Belt considers the specific sites proposed for release. The analysis focuses on impact on the Green Belt purposes and whether resultant Green Belt boundaries will be strong and defensible based on recognisable features.</p> <p>In the Local Plan Inspector's Report, the Inspector considered the history and nature of the Green Belt in Stevenage commenting that it was constrained due to the Green Belt boundary being tightly drawn around the edge of the urban area and also given that the town is relatively new (post war) meaning there are limited opportunities for redevelopment. The Inspector noted that as neighbouring authorities were also reviewing their Green Belt boundaries to meet their own needs, they would be unlikely to accommodate Stevenage's needs.</p> <p>The Inspector concludes that the only way Stevenage can meet its identified housing need is to release suitable land from the Green Belt. On a site by site basis, the Inspector considers the outcomes from the Council's Green Belt Review and the relative performance of the sites proposed to be allocated noting the impact of the removal of the site on the overall function of the Green Belt. The Inspector concludes that in the context of the Council's housing need which cannot be met outside of the Green Belt and taking into account the thorough Green Belt site assessments and the resultant impact on the overall function of the Green Belt, exceptional circumstances exist to release the proposed sites.</p>
<p>Warrington Borough Council</p> <p>Local Plan (December 2023)</p>	<p>The Local Plan was examined against the NPPF published in July 2021.</p> <p>The Local Plan in the supporting text at Section 3.4 sets out the exceptional circumstances. Paragraph 3.4.2-7 confirms that the Council has examined fully all other reasonable options for meeting Warrington's identified need for development before concluding that exceptional circumstances exist to justify Green Belt release.</p> <p>Paragraph 3.4.8 summarises the exceptional circumstances case as follows:</p> <p><i>"3.4.8 The starting point for Warrington's Exceptional Circumstances is the requirement to ensure that sufficient land is provided to meet Warrington's development needs. The Plan's proposed housing requirement will ensure that issues of affordability are addressed and that that sufficient homes are provided to support the planned level of economic growth, but this can only be achieved with the release of Green Belt."</i></p> <p>At paragraph 3.4.11, the Council sets out the exceptional circumstances for each of the areas of Green Belt release. Paragraph 5.1.13 notes that in order to</p>

Local Authority	Arup Summary
	<p>assist in amending detailed Green Belt boundaries, a comprehensive Green Belt Assessment had been undertaken.</p> <p>The Council did not prepare a separate exceptional circumstances report or Green Belt Topic Paper however the Development Options and Site Assessment Technical Report (September 2021) briefly touches on the exceptional circumstances. The Green Belt evidence contributed to the exceptional circumstances case – this consisted of Green Belt Assessments, a Green Belt Site Selection process, and a report considering the implication of Green Belt release which assessed the Green Belt harm.</p>
<p>Watford Borough Council</p> <p>Local Plan (October 2022)</p>	<p>The Local Plan was examined against the NPPF published in July 2021.</p> <p>The Local Plan included changes to the Green Belt in five locations however three of these locations were already developed and the Inspector concluded that due to this, these locations no longer served any Green Belt purpose. Only one of the five locations was a proposed housing allocation. The other location was an extension to an established gypsy and traveller site.</p> <p>Reflecting this limited Green Belt release, there is very limited policy text or supporting text which mentions exceptional circumstances within the Local Plan. Furthermore, the Council did not have a separate topic paper or exceptional circumstances case. The Stage 2 Green Belt Assessment (October 2019) provides an assessment of the Green Belt and considers the potential harm to the Green Belt.</p>

4.3.2 Key Findings

The review of approaches adopted by other local authorities shows that it is important to demonstrate the strategic level exceptional circumstances to justify the release of Green Belt land more generally as well as establishing exceptional circumstances for the release of specific sites.

4.3.2.1 Strategic Exceptional Circumstances

Four of the local authorities reviewed were examined against the 2012 NPPF (Broxbourne, Guildford, Runnymede, and Stevenage). Both Broxbourne and Stevenage based their strategic exceptional circumstances cases on the criteria set out in *Calverton*.

Runnymede Council identified five key factors which amounted to the strategic exceptional circumstances which consisted of an amalgamation of the *Calverton* criteria, the 2019 NPPF and other Borough-specific considerations. Although the Runnymede Local Plan was examined against the 2012 NPPF, the Inspector made reference to the 2019 NPPF noting that the Council had assessed all other reasonable options for meeting identified needs. In concluding on the strategic exceptional circumstances, the Guildford Local Plan Inspector took into account the need for housing, business needs, land availability in the urban areas, and whether the quantity of development should be restricted having regard to footnote 9 of the 2012 NPPF.

The South Oxfordshire Local Plan was examined against the NPPF published in July 2018. The Council's evidence base referred to the *Calverton* criteria. The Local Plan Inspector's Report noted the requirements of paragraph 137 (NPPF 2018) and confirmed that the Council has examined fully all other reasonable options for meeting identified needs. This combined with the significant level of housing needs, employment and social needs, and the need for balanced, sustainable development constituted the exceptional circumstances.

Similarly, the County Durham Plan was examined against the NPPF published in February 2019 and the Council demonstrated that they had examined fully all other reasonable options with the Local Plan Inspector referring to the requirements of paragraph 137 (NPPF 2019). The Council's exceptional circumstances case was based on the need to ensure sustainable patterns of development, maximise the number of journeys undertaken by sustainable means, provide the right type of housing to meet needs, help address economic under-performance by supporting the economic potential of Durham City, and to maximise the delivery of affordable housing and other infrastructure.

The Local Plans for Cheshire East, St Helens, Warrington and Watford were all examined against the NPPF published in July 2021. Warrington Borough Council explicitly refers to paragraph 141 (paragraph 147 in the current NPPF) in the supporting text of their draft Local Plan confirming they have examined fully all other reasonable options for meeting identified needs. The Council notes that the starting point for their exceptional circumstances case is the requirement to ensure that sufficient land is provided to meet Warrington's development needs which will help to address issues of affordability and support the planned level of economic growth. This is further justified by the Council's spatial strategy which will enable the creation of new sustainable communities which will support the strategic infrastructure required to address congestion issues and unlock major brownfield sites.

St Helen's Council takes a similar approach evidencing the requirements of paragraph 141 (paragraph 147 in the current NPPF) with their exceptional circumstances case being as follows: ensuring that the housing and employment needs of St Helens are met in full within the Borough, insufficient capacity on suitable and available sites within urban areas, and the lack of any scope to help meet the Borough's needs in any neighbouring district.

Cheshire East Council chose not to alter Green Belt boundaries in the SADPD as the exceptional circumstances which had previously been established in the adopted LPS no longer existed due to the growth in the housing land supply since the LPS was adopted.

Watford Borough Council had very limited Green Belt release and this example demonstrates that the exceptional circumstances case should be proportionate to the amount of Green Belt land proposed to be released.

The review demonstrates that the strategic exceptional circumstances cases have been built around the following factors:

- scale of housing or employment need;
- constrained nature of the local authority area, including extent of Green Belt and nature of boundaries around settlements;
- lack of other reasonable options;
- land availability;

- use of brownfield and under-utilised land;
- optimising density in the urban area;
- ability of neighbouring authorities to accommodate need;
- ensuring sustainable patterns of development;
- corrections to Green Belt boundaries to reflect development or illogical/undefensible boundaries; and/or
- need to accommodate growth of a strategic facility or sector (for example, Runnymede Council identified a specific need for pitches and plots to accommodate gypsies, travellers and showpeople and also identified a specific requirement for the expansion of St Peter's Hospital).⁹

Some of the local authorities reviewed prepared a separate Green Belt Topic Paper (e.g., Guildford, South Oxfordshire and Stevenage) or Exceptional Circumstances Case report (e.g., Durham and Runnymede) alongside their Green Belt evidence however this is not a requirement and seems to rest on the clarity of explanation in the Local Plan and supporting evidence.

4.3.2.2 *Site Level Exceptional Circumstances*

The review of other approaches demonstrates that the site level exceptional circumstances cases have primarily focused on:

- relative performance of the site against Green Belt purposes;
- impact of removing the site on the overall function and integrity of the wider Green Belt;
- presence/creation of a recognisable and permanent boundary;
- contribution to housing/employment need;
- whether the site is a sustainable location for growth;
- use of brownfield land;
- assessment of alternative sites; and/or
- suitability of site for proposed use.

The St Helen's example demonstrates the importance of clearly articulating the site-specific exceptional circumstances on a site-by-site basis. The Local Plan Inspector required a main modification to the supporting text of the allocation policies as the site-specific exceptional circumstances were not sufficiently clear in the submission version of the Plan.

In terms of the relative performance of the site against Green Belt purposes, the site does not necessarily have to perform weakly in Green Belt terms to demonstrate exceptional circumstances as the balance of other factors may drive the argument for its release. For example, the County

⁹ Analysis of examination reports by planningresource.co.uk (*Five Circumstances 'Exceptional' Enough to Justify Green Belt Release in Local Plans*, Stuart Watson, 2020), identified that other unmet needs can contribute to exceptional circumstances including educational need, need for Gypsy and Traveller pitches, student needs and maximising economic benefits of High Speed 2.

Durham Plan notes that two of the proposed allocations performed strongly against some of the Green Belt purposes however on balance the benefits clearly outweigh the harm to the Green Belt.

4.3.3 Summary

The following key lessons have been identified from the review of other approaches:

- It is important to demonstrate the strategic level exceptional circumstances to justify the release of Green Belt land more generally as well as establishing exceptional circumstances for the release of specific sites.
- The exceptional circumstances case can be set out in a separate document (for example, an exceptional circumstances case report or Green Belt Topic Paper) – whilst this is not a requirement, it can help to clearly explain the approach and justification and signpost to the relevant evidence.
- Strategic exceptional circumstances cases have been built around the following factors:
 - scale of housing or employment need;
 - constrained nature of the local authority area, including extent of Green Belt and nature of boundaries around settlements;
 - lack of other reasonable options;
 - land availability;
 - use of brownfield and under-utilised land;
 - optimising density in the urban area;
 - ability of neighbouring authorities to accommodate need;
 - ensuring sustainable patterns of development;
 - corrections to Green Belt boundaries to reflect development or illogical/indefensible boundaries; and/or
 - need to accommodate growth of a strategic facility or sector.
- Site level exceptional circumstances cases have primarily focused on:
 - relative performance of the site against Green Belt purposes;
 - impact of removing the site on the overall function and integrity of the wider Green Belt;
 - presence/creation of a recognisable and permanent boundary;
 - contribution to housing/employment need;
 - whether the site is a sustainable location for growth;
 - use of brownfield land;
 - assessment of alternative sites; and/or
 - suitability of site for proposed use.

- A site does not necessarily have to perform weakly in Green Belt terms to demonstrate exceptional circumstances, the balance of other factors may drive the argument for its release.
- Conclusions for the site level exceptional circumstances case have been seated in the context of the overall strategic case and present the balance of the development benefits weighed against the impact on the Green Belt purposes and integrity.

4.4 Recommended Approach

If the Council considers it necessary to release Green Belt land in order to meet the identified housing and/or employment needs, based on the review of national policy, case law and the approaches adopted by other local authorities, it is recommended that the Council's exceptional circumstances case should consider:

Strategic exceptional circumstances case:

- The housing, commercial or other development need.
- Constraints within Stoke-on-Trent.
- Ensuring sustainable patterns of development.
- Lack of other reasonable options (as required by paragraph 147 NPPF). This should consider:
 - Brownfield and underutilised land;
 - The potential to optimise the density of development;
 - Surplus open space;
 - Sites within inset settlements / whether any washed over villages are suitable for inseting (if relevant);
 - Major previously developed sites in the Green Belt (if relevant); and
 - The ability of neighbouring authorities to accommodate some of the identified needs.
- Any other circumstances specific to Stoke-on-Trent.
- Whether alterations to the Green Belt would '*fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan*' (paragraph 146).

Site-level exceptional circumstances

- Performance of the site against Green Belt purposes.
- Impact of removing the site on the overall function and integrity of the wider Green Belt taking into account the cumulative impact.
- Presence/creation of a recognisable and permanent boundary.
- Sustainability of the site.
- Contribution to housing/commercial/other development need.

- Assessment of alternative sites (including whether previously developed land and grey belt which is not previously developed has been considered in the first instance).
- Any other circumstances specific to the site in question.

4.5 Critical Friend Review

The table below considers each of these factors and whether they have been evidenced by the Council taking into account national policy, case law and the approaches adopted by other local authorities.

It is acknowledged that the Council is still in the process of developing their evidence base at this stage and this table only considers information which is available or where the Council has informed Arup that this information is being prepared.

Table 21. Review of Evidence forming the exceptional circumstances Case

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
Strategic exceptional circumstances case		
Has the housing, commercial or other development need been demonstrated?		
<ul style="list-style-type: none"> • Housing needs • House price and affordability issues • Affordable housing needs • Ensuring the right type of housing • Commercial needs • Ensuring the right type of land in the right location to meet employment demand • Other development needs 	<p>The Council is currently preparing a range of evidence to demonstrate the housing need. A key issue within Stoke-on-Trent is ensuring the right type of housing, including affordable housing however viability evidence suggests that many of the Council's brownfield sites are not currently viable without some form of public sector intervention.</p> <p>The Council previously produced a Housing and Employment Needs Assessment Update (November 2021) however the new standard method based on PPG (December 2024) has increased the requirement for housing from 705 per annum to 948. The Council has commissioned a Residential Mix Assessment to align this figure to the composition of needs including updating evidence regarding the level of affordable housing required. Through previous studies this has concluded a requirement of 124 affordable homes per annum.</p> <p>Linked to this, the Council has produced a Viability Assessment which concluded there was limited viability to support infrastructure provision and affordable housing on many of the brownfield sites up to 100 dwellings. This therefore covers a significant proportion of the portfolio. Therefore, there are other factors coming into play which means that even if there was sufficient supply in the urban area, due to the mix of housing required, the Council would still be unable to meet their needs based on this alone as due to the viability issues, they would be unable to deliver on their affordable housing needs. This evidence can be confirmed in terms of how much affordable housing is realistically deliverable through the site selection process currently underway.</p>	<p>This will be evidenced in the following documents:</p> <ul style="list-style-type: none"> • Housing and Employment Needs Assessment • Residential Mix Assessment • Viability Assessment
Constraints within Stoke-on-Trent and implications for ensuring sustainable patterns of development		

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
<p>Is the Green Belt constraining development in the district?</p>	<p>The Stoke-on-Trent Green Belt is tight and narrow from the urban area up to the authority boundary creating green wedges between the urban area. Whilst the extent of Green Belt is not significant in the context of the district's land area overall, the Green Belt surrounds the urban area on all sides.</p> <p>Section 2.4.1 above sets out the history and evolution of the Green Belt in Stoke-on-Trent. It notes that the Green Belt forms part of the wider North Staffordshire Green Belt which was originally defined in 1967. Subsequent reviews have been as follows:</p> <ul style="list-style-type: none"> • The boundary was reassessed through the Staffordshire Structure Plan 1986-2001 however no alterations were made. • The North Staffordshire Green Belt Local Plan was adopted in 1983 and included a reassessment of the Green Belt boundary resulting in some boundary changes. • The Stoke-on-Trent City Plan 1990-2001 was adopted in 1993. This set out new policies for the Green Belt and made a change to the Green Belt boundary at Ravensdale. • The Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026 was adopted in 2009 with no alterations to the Green Belt boundary. <p>It is evident that there have been a few alterations to the Green Belt boundary over the years however this has not been extensive. The last time the Green Belt boundary was altered was in 1993.</p> <p>As set out in the section above, it is the combination of Green Belt and viability issues in Stoke-on-Trent which is constraining providing an appropriate mix of housing.</p>	<p>The documents listed above will assist in evidencing this.</p>
<p>Are there any other significant constraints on development in Stoke-on-Trent?</p>	<p>Beyond the viability issues mentioned above, a further constraint in Stoke-on-Trent is flood risk as there are significant areas of surface water flooding. The Council has undertaken a Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA). A number of potential development sites are considered within the SFRA2</p>	<p>This is evidenced in the Level 1 and Level 2 Strategic Flood</p>

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
	including sites falling in Flood Zone 3. As such the Exception Test has been undertaken. Approximately 20 of the 80 sites in the SFRA2 have an element of flooding which significantly reduces the developable area.	Risk Assessment
Lack of other reasonable options (paragraph 147 of the NPPF)		
Brownfield and underutilised land	<p>The NPPF at paragraph 147(a) makes clear that strategies should “...<i>makes as much use as possible of suitable brownfield sites and underutilised land.</i>”</p> <p>The Council has confirmed that a number of activities are ongoing to fully explore all brownfield and underutilised land. In particular, the SHELAA database has been pulled together using a variety of methods including Call for Sites and officer desktop search. The Council has had an ongoing open Call for Sites which means new sites could still come forward.</p> <p>Between February 2023 and Autumn 2024, the Council completed a targeted developer engagement/Call for Sites process to ensure they had the most up to date information regarding available sites across the city. An updated SHELAA methodology (May 2024) has also been produced to ensure that the information supporting the officer assessment is based on the most recent data. This is particularly relevant to applying appropriate density and developable area calculations across the city (see below).</p> <p>The Council has an existing Brownfield Land Register however many of these sites have already either got planning permission or are complete.</p> <p>The Council intends to produce a Topic Paper which will explain the approach taken to exploring all brownfield opportunities.</p>	<p>This will be evidenced in the following documents:</p> <ul style="list-style-type: none"> • Topic Paper • SHELAA • Site Selection Assessments • Brownfield Land Register
Potential to optimise the density of development	<p>The NPPF at paragraph 147(b) makes clear that strategies should “...<i>optimise the density of development</i>”.</p> <p>The SHELAA Methodology (May 2024) sets out the different density assumptions for each ward. These are based on historic data on completed schemes and extant planning permissions of 5 or more dwellings from various</p>	The Council will need to evidence if and how they have sought to optimise density on the proposed

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
	<p>sub-areas. This is to ensure that these assumptions are based upon site densities which were deliverable and considered to be suitable in the context of the area. The density assumptions range from 30dph in the more rural areas to 100dph in the city centre.</p> <p>These assumptions broadly align with the densities adopted by other local authorities.</p> <p>The County Durham Plan includes a density of 30dph for all of its allocations (paragraph 4.88). The Inspector was satisfied with this as the Council had explored 40dph and this would have still necessitated significant Green Belt release.</p> <p>The St Helen's Local Plan (Policy LPA04) requires a density for new development of at least 40dph on sites within or adjacent to the town centres and 30dph on sites outside of the town centres. Densities less than 30dph will only be appropriate where they are necessary to achieve a clear planning objective. The Inspector was satisfied with this noting that increasing densities above this could result in 'town cramming'.</p> <p>The Warrington Local Plan (Policy DEV1) requires a density for new development of at least 130dph on sites within Warrington Town Centre; 50dph on sites within the wider town centre or adjacent to a district centre or other locations well served by public transport; and at least 30dph on other sites that are within an existing urban area. The policy states that new residential development should optimise the amount of housing developed on a site and the densities identified are minimum densities. The policy adds that densities of less than 30dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of an area. The Local Plan Inspector noted that Policy DEV1 rightly seeks to make efficient use of housing sites and promote minimum densities.</p> <p>The Council's SHELAA methodology notes that the assumptions applied are intended as a starting point for estimating capacity. As such, it is recommended that the Council's site selection work or other site-specific evidence demonstrate how the Council has sought to</p>	<p>allocations (where appropriate) through the site selection process or other site-specific evidence (e.g. masterplanning).</p>

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
	optimise density on proposed allocations (where appropriate).	
Surplus open space	<p>The Green Space Strategy was updated in 2018 with a further interim update completed in 2021. The report concludes that the green space position is strong with a surplus supply of green space up to 2040 across all typologies (allotments, amenity recreation, formal parks and gardens, and semi-natural greenspace) except for playgrounds. The report concludes that those sites that scored particularly poorly in terms of quality should be considered as to whether disposal is appropriate. Paragraph 113 of the Interim Update Report recommends that: <i>“Green spaces with development potential will have to be assessed, screened and analysed for development constraints that have potential to prevent or seriously compromise new development, unless suitable mitigation or required infrastructure proves possible”</i>.</p> <p>The SHELAA does include green space sites (the majority of which are Council owned), and a number of sites may also have been previously considered in the SHLAA. However as recommended in the Green Space Strategy Interim Update, any potential green space sites for development will need to go through a formal assessment process. As such the Council will need to evidence that this process has been undertaken.</p>	<p>The surplus supply of green space is evidenced in the Green Space Strategy (November 2018) and the Green Space Strategy Interim Update (21 December 2021).</p> <p>Any relevant green space sites will be considered in the SHELAA and/or through the site selection process.</p>
Are there any sites within inset settlements and/or could any washed over villages be inset with sites allocated within these villages?	Section 6 of this report considers whether there are any villages which are either inset and/or washed over by the Green Belt. This concludes that Ball Green and Norton Green are villages however both of these are inset within the Green Belt. As such it may be relevant to consider sites within these villages taking into account the Council’s settlement hierarchy and emerging spatial strategy.	If there are any relevant sites within these inset villages, consideration of these sites will be evidenced through the SHELAA and/or site selection process.
Are there any major previously developed sites in the Green Belt would could be	The only major previously developed site in the Green Belt is Chatterley Whitfield (a former coal mine) located on the outskirts of Chell and Ball Green. The site is owned and managed by the Council and encompasses	If the Council propose to remove Chatterley Whitfield and

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
inset and/or redeveloped?	<p>50ha of former mining buildings and structures within a wider setting of the 50ha country park.</p> <p>A vision document for the site was prepared illustrating how it could be regenerated over the next 10 years if funding could be secured. The vision document was commissioned by Historic England, and it identifies potential uses for the site including new homes, geothermal energy production and leisure facilities. The site has significant constraints, and a large amount of funding would be required to deliver the vision.</p> <p>In order to allocate the site for redevelopment and remove it from the Green Belt, the Council would need to set out the exceptional circumstances case. If part of the site is proposed for housing, it could be argued that the release of the site will contribute towards the Council's housing needs and if the development of housing is required to cross subsidise redevelopment of other parts of the site this argument has also been considered to be acceptable by Local Plan Inspectors. For example, the Runnymede Local Plan proposed to release the entirety of St Peter's Hospital which was located in the Green Belt with two allocations proposed within the site for residential development which was required to fund improvements to the hospital. The Local Plan Inspector agreed that exceptional circumstances existed to remove the hospital from the Green Belt.</p> <p>Similarly, the Warrington Local Plan proposed to release areas of Green Belt adjacent to the former Fiddlers Ferry Power Station which itself was not located in the Green Belt. The Council argued that the Phase 1 development of 860 houses on Green Belt to the east of the site was required to cross-subsidise the demolition and remediation costs of developing the power station for employment uses. The Council had viability evidence to support this, and the Inspector agreed that exceptional circumstances had been demonstrated. Two further allocations for housing in the Green Belt to the south of the power station were proposed as part of Phase 2 however the Inspector noted that the phase 2 housing development would not be required to cross subsidise the development of the employment land. The Inspector also</p>	allocate the site for redevelopment, the exceptional circumstances case for this will need to be evidenced.

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
	<p>commented that the Council's viability evidence suggested that the delivery of phase 2 could be challenging. Overall, the Inspector concluded there would be an adequate supply of housing even if phase 2 were to be removed and exceptional circumstances did not exist for phase 2.</p> <p>These examples demonstrate that the release and development of Green Belt land to enable the redevelopment of an adjacent site could form part of the exceptional circumstances case. It may be that Chatterley Whitfield is proposed for other development needs for example green energy or employment, in which case, the need for this would have to be evidenced. The Council would also need to demonstrate that site is developable and therefore that funding has either been secured or agreed and the site is likely to come forward within the plan period. The site-level exceptional circumstances in terms of the impact on the Green Belt, consideration of alternatives, and consideration of site sustainability will also be important. There will be a balance to be struck regarding the amount of Green Belt release required to enable to rest of the redevelopment as well as the location of the enabling development and the Green Belt impact of this.</p> <p>If it is not possible to demonstrate the site is developable at this stage, an alternative approach would be for the site to be permitted via a planning application at a later stage. Given the previously developed nature of the site, it could be the case that the site is assessed as 'grey belt' and therefore very special circumstances would not need to be demonstrated provided that all of the requirements of paragraph 155 NPPF can be met, and the golden rules (para 156 and 157) are met.</p>	
Could neighbouring authorities accommodate some of the identified needs?	<p>The NPPF at paragraph 147(c) makes clear that strategies should be "... <i>informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.</i>"</p> <p>As the site selection process is ongoing, the remaining identified need is still being confirmed. The Council has confirmed that Duty to Cooperate meetings are starting in</p>	This will be evidenced through the Statements of Common Ground with Duty to

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
	April 2025. It is envisaged that it is unlikely that Newcastle-under-Lyme would be able to take any of Stoke's needs given they asked the same question as part of their Local Plan process.	Cooperate partners.
Ensuring sustainable patterns of development	This is a consideration as part of each of the above elements. The assessment of the spatial options and the sustainability appraisal will be key to evidencing this.	This will be evidenced through all of the above and in particular through the assessment of the spatial options and sustainability appraisal.
Fundamentally undermine test (paragraph 146 NPPF)		
Whether alterations to the Green Belt would ' <i>fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan</i> ' (paragraph 146).	<p>Whilst this element of the NPPF is untested as yet in the context of plan-making, it is considered that it is best assessed as part of the exceptional circumstances case in order to consider the proposed Green Belt release in its entirety once the potential Green Belt allocations are known.</p> <p>It is envisaged that the site-level Green Belt purpose assessments and Green Belt impact assessments will assist the Council in undertaking the fundamentally undermine test.</p> <p>The Council will need to demonstrate that the combined release of the Green Belt allocations does not fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. Paragraph 008 of the PPG provides further guidance on this stating that in reaching this judgement, "...authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way."</p>	The site-level assessments will assist in making this determination however the allocations and release from the Green Belt should be considered in its entirety. It will be necessary to demonstrate that collectively the proposed release of Green Belt sites does not fundamentally undermine the purposes (taken together) of the remaining Green Belt.

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
Site-level exceptional circumstances case		
Green Belt considerations		
<ul style="list-style-type: none"> • Performance of the site against Green Belt purposes. • Impact of removing the site on the overall function and integrity of the wider Green Belt taking into account the cumulative impact. • Presence /creation of a recognisable and permanent boundary. 	<p>Section 2 of this report sets out a Green Belt site assessment methodology based on the revised NPPF and PPG. This builds on the previous Green Belt Assessment Part 1 and Part 2 although the methodology has been updated in the context of the new NPPF and PPG. The methodology enables the identification of ‘grey belt’ sites. It considers the site’s contribution to Green Belt purposes and the impact of releasing the site (alongside other sites being assessed) from the Green Belt (in terms of any harm to the function and integrity of the Green Belt).</p> <p>The methodology also considers the resultant Green Belt boundary. If the resultant boundary is not recognisable and permanent, it is recommended that if the site is taken forward, the accompanying policy will need to require the creation of a new recognisable and permanent boundary or the strengthening of the existing boundary. This approach has been considered acceptable by Local Plan Inspectors (for example, in the County Durham Plan).</p> <p>For those sites which the Council proposes to allocate, it is recommended that the above elements are clearly articulated on a site-by-site basis, linking back to the findings of the Green Belt studies and any subsequent evidence, for example masterplanning work.</p>	Each element will need to be considered on a site-by-site basis linking back to the findings of the Green Belt studies and any subsequent evidence, for example masterplanning work.
Site considerations		
<ul style="list-style-type: none"> • Sustainability of the site. • Contribution to housing/ commercial/ other development need. • Assessment of alternative sites 	<p>These elements will be considered and evidenced through the site selection process, the sustainability appraisal, and other evidence.</p> <p>The Council has developed a Site Selection Methodology. The application of this and the decision making at each stage of the process will need to be clearly articulated.</p>	This will be evidenced through the site selection process, sustainability appraisal and other evidence.

Elements of the Exceptional Circumstances Case	Has this been evidenced?	Evidence Required
<p>(including whether previously developed land and grey belt which is not previously developed has been considered in the first instance).</p> <ul style="list-style-type: none"> Any other circumstances specific to the site in question. 		

5. Safeguarded Land Advice

5.1 Overview

This section provides advice on safeguarded land. It considers national policy and guidance and considers the approaches taken by other local authorities with recently adopted Local Plans. A recommended approach is set out to assist the Council in determining whether safeguarded land is necessary and to determine the quantum and location of safeguarded land.

The Council does not currently have a policy on safeguarded land and there is no safeguarded land in the adopted Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (2009).

5.2 National Policy and Guidance

5.2.1 National Policy Context

Paragraph 149 of the NPPF sets out the requirements in relation to safeguarded land. It states:

‘When defining Green Belt boundaries, plans 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 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**. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- (e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” (emphasis added)*

In summary, paragraph 149 sets out the principle that in some cases there may be a need for a Plan to include areas of land to meet the authority’s longer-term development needs beyond the plan period. In doing so, this will also ensure the permanence of the Green Belt boundary by safeguarding specific areas for future development needs without triggering the need to further alter the Green Belt boundary. Protection is provided for sites that are identified as safeguarded land as planning permission for the development of these sites will only be granted following an update to a plan.

In addition, paragraph 145 states: “*Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*”

This would indicate that if exceptional circumstances mean that the Council seek to remove land from the Green Belt and allocate it for development, then adequate land to allow the Green Belt boundary to endure beyond the plan period will be required to be identified as safeguarded land.

5.2.2 Guidance

There is limited guidance on safeguarded land. PPG does not provide any further guidance on safeguarded land.

The Planning Advisory Service (PAS) published guidance in relation to Green Belt boundaries and safeguarded land in 2014 and 2015 and there was a Commons Debate held on the concept of safeguarded land in 2014. Whilst this guidance is somewhat dated, given that the national policy context on safeguarded land remains unchanged, it still remains relevant.

Planning Advisory Service ‘The Big Issues – Green Belt’ (Updated February 2015)

PAS issued guidance on the approach to reviewing Green Belt boundaries and identifying safeguarded land within a Local Plan. The guidance highlights the dichotomy between achieving Green Belt boundary permanence and finding suitable land for development. However, it does recognise that there is no guidance on how to interpret the national policy on safeguarded land, nor any consistent pattern discernible from Local Plan examinations. The paper concludes the following:

“In some cases local authorities seek to identify safeguarded land over and above the calculated development requirement for the plan period...there are certainly cases where the issue is effectively ignored by the planning authority and examining inspectors alike.”

Planning Advisory Service ‘Plan-Making Question and Answer Green Belt’ (April 2014)

PAS maintains ‘Questions and Answers’ on areas for consideration when reviewing the Green Belt boundary. The guidance states that safeguarded land should be *“considered beyond the 15 years of the plan...the notion is to make any changes to the Green Belt more permanent, i.e. probably two plan lifespans.”* Safeguarded land can be protected so that it would only be released when it was needed.

Commons Debate (May 2014)

In response to Commons Debates regarding the concept of ‘Safeguarded Land’ held in May 2014,¹⁰ Nick Boles stipulated that whilst the terminology within the NPPF was not sufficiently clear, that the allocation of such land must have regard to the following:

“Safeguarding is not a requirement for every local authority with green-belt land. It is something that it can choose to do, but only if necessary. If the plan that it puts forward has provisions to meet housing needs in full and if other sites are available for potential future development beyond the life of the plan, it may well be that safeguarding land is unnecessary”.

Nick Boles further explained that the concept of safeguarded land has a good justification in some areas for the following reason: *“if future development needs are likely to require further difficult choices about some sites in the green belt, it is better to be clear that certain sites might someday*

¹⁰ House of Commons Hansard Debates for 13 May 2013 webpage – See Column 243WH.

have to have their status reviewed, than to have the entire green belt under some abstract possible future threat.”

5.2.3 Summary

The NPPF confirms that when reviewing Green Belt boundaries, local planning authorities should consider the requirement to identify safeguarded land in order to meet their longer-term development needs.

Guidance from PAS suggests that a lack of advice regarding the interpretation of the requirement has resulted in inconsistencies in the approaches taken by local authorities and Inspectors alike.

In spite of this lack of guidance, fundamentally there are four implications arising from paragraph 145 and 149 of the NPPF:

- Whether the definition of safeguarded land is ‘necessary’ within Stoke-on-Trent;
- Whether there are ‘longer-term development needs’ which justify the definition of areas of safeguarded land (paragraph 149 NPPF).
- The quantum of safeguarded land required and how this relates to the current development needs and ‘needs stretching well beyond the plan period’ (paragraph 149 NPPF).
- The location of safeguarded land and how this relates to sustainable development.

5.3 Approaches taken by other Local Authorities

5.3.1 Introduction

Given the previously highlighted inconsistencies in approaches to safeguarded land, it is useful to have an appreciation of the differing approaches taken by other local authorities and their justification.

The approach to safeguard land for the following ten local authorities has been reviewed:

- Barnsley Council
- Broxbourne Borough Council
- Cheshire East Council
- Durham County Council
- North Warwickshire Council
- Northumberland County Council
- Runnymede Borough Council
- St Helen’s Council
- Wakefield Council
- Warrington Borough Council

All of the authorities have been through Examination in Public and have had their Local Plan adopted within the past six years.

Some of the local authorities (Broxbourne, Durham, North Warwickshire, Runnymede, and Warrington) did not identify safeguarded land and the justification for this is explained below.

The table below includes a summary of the justification, approach, location, quantum and duration of the safeguarded land. A full review table including relevant extracts from documents and links to document sources is included at Appendix B.

Table 22. Summary of approaches taken by other local authorities.

Local Authority	Arup Summary
<p>Barnsley Council</p> <p>Local Plan (January 2019)</p>	<p>Safeguarded Land: Yes – see Policy GB6.</p> <p>Justification: Safeguarded land is required due to the extent of the Green Belt and the tightly drawn boundaries around Urban Barnsley and the Principal Towns which are the most sustainable locations for development. This will give permanence to the Green Belt boundary until at least 2038.</p> <p>Location: Safeguarded land was identified in locations across the settlement hierarchy, not just Barnsley and the Principal Towns, but also the villages.</p> <p>Approach: The Council identified the sites through a combination of evidence including the housing site selection methodology, Green Belt assessment and Sustainability Appraisal (SA). Some of the sites had been carried forward from the UDP with some additional sites also proposed. The housing site selection methodology concluded that the proposed safeguarded sites performed less favourably compared with the allocated sites and/or had deliverability issues which would be unlikely to be resolved within the plan period.</p> <p>Quantum: The Council projected forward the annual housing requirement for 5 years after the plan period and deducted the supply likely to come forward on windfall sites. In the Local Plan Inspector’s Report, at paragraph 112-114, the Inspector concluded that in the absence of any national guidance, this was a pragmatic and reasonable approach. The Inspector’s Report at paragraph 239 states: “Where necessary, exceptional circumstances have been demonstrated to justify alterations to the Green Belt boundary and the removal of land from the Green Belt to meet the objectively assessed need for employment, housing and identify areas of safeguarded land.”</p> <p>Duration: 5 years beyond the plan period.</p>
<p>Broxbourne Borough Council</p> <p>Local Plan (June 2020)</p>	<p>Safeguarded Land: No</p> <p>The Council did not identify any safeguarded land in its adopted Local Plan. The Inspector agreed with this approach concluding:</p> <p><i>“There are, of course, considerable uncertainties about what development will be needed in the Borough in the longer term and it would not be appropriate to attempt to quantify that at the present time. In terms of how needs may be met in the longer term, the Plan identifies a number of significant opportunities including in and around Waltham Cross town centre and elsewhere associated with Crossrail 2. In addition, the Council may wish to consider further whether the existing residential and industrial areas in the</i></p>

Local Authority	Arup Summary
	<p><i>Borough have greater potential for intensification through redevelopment and infilling.</i>” (Paragraph 118, Local Plan Inspector’s Report).</p> <p>Given that the Council had identified potential longer term development opportunities in the urban area, the Inspector was satisfied with this approach, whilst also suggesting that infilling and intensification of residential and industrial may also provide additional development opportunities.</p>
<p>Cheshire East Borough Council</p> <p>Local Plan Strategy (July 2017)</p> <p>Site Allocations and Development Policies Document (December 2022)</p>	<p>Safeguarded Land: Yes – see Policy PG4 in the Local Plan Strategy and Policy PG11 in the adopted Site Allocations and Development Plan Document. The Local Plan Strategy established the quantum of safeguarded land and identified strategic areas of safeguarded land within the Principal Town and Key Service Centres. The Site Allocations and Development Plan document identified non-strategic areas within the Local Service Centres.</p> <p>Justification: Safeguarded land is required due to the extent of the Green Belt and the tightly drawn boundaries around the northern part of the borough which includes inset settlements within the top three tiers of the settlement hierarchy (Principal Towns, Key Service Centres and Local Service Centres). For the South Cheshire Green Belt, all settlements in the top three tiers of the hierarchy are located beyond the Green Belt and already retain significant areas of non-Green Belt land adjacent to their settlement boundaries. Consequently, the distribution of safeguarded land was in the northern sub-area only.</p> <p>Location / Approach: In identifying the strategic areas of safeguarded land in the Local Plan Strategy, the Council considered four options for the distribution of safeguarded land within the north of the borough:</p> <ol style="list-style-type: none"> 1. Provision of all 200 ha in the Principal Town of Macclesfield 2. Provision of safeguarded land distributed proportionately by settlement, based on the spatial distribution of development in LPS Policy PG 7 3. Provision of safeguarded land distributed proportionately by settlement based on the resident population 4. A hybrid approach based on Options 2 and 3 above <p>Option 4 was considered the most appropriate. This was due to a large, proposed allocation in one of the settlements which would have skewed the distribution of safeguarded land if Option 2 alone had been chosen.</p> <p>Once the spatial distribution had been determined, in order to select the areas to safeguard, the Council applied evidence including their site selection methodology, Green Belt assessment and SA.</p> <p>Macclesfield had the majority of the safeguarded land required (95ha out of 200ha) which Inspector concluded was appropriate at paragraph 101 of the Local Plan Strategy Inspector’s Report: “<i>Since Macclesfield has the highest</i></p>

Local Authority	Arup Summary
	<p><i>amount of growth outside Crewe and is the only Principal Town in the Green Belt, it is sensible and reasonable that its allocation of Safeguarded Land is proportionately higher than other settlements.”</i></p> <p>In safeguarding non-strategic areas within the Local Service Centres in the Site Allocations and Development Plan Document, the Council took a slightly different approach to distribution as the approach taken for the Local Plan Strategy (largely based on the spatial distribution of indicative development requirements) was not considered appropriate in the context of the Local Service Centres.</p> <p>The Council considered 8 options for the distribution of the 13.6 ha of Safeguarded Land. A hybrid approach (Option 8) was chosen as the preferred option, combining several other options, taking account of the extent of services and facilities, constraints, opportunities and impacts on the Green Belt.</p> <p>Quantum: 200ha. This was calculated as part of the Local Plan Strategy process by projecting forward current development needs in the northern sub-area. It was not appropriate to project forward the needs for the Borough as a whole given there was no requirement for safeguarded land in the South Cheshire Green Belt. The Council initially projected forward needs by 10 years and reviewed the likely sources of supply beyond the plan period (including over-provision of housing land within the plan period, the Urban Potential Study Findings, windfall sites/completions on non-allocated sites, the SHLAA, Brownfield Local Development Orders and other potential sources). Following this review, the Council made a modest reduction to the duration and tested scenarios for 8, 9 and 10 years against density scenarios of 30, 35 and 40dph. This provided the Council with range of parameters for the amount of safeguarded land, ranging from 155ha to 244ha. Taking into account all factor, the Council adopted the midpoint of 200 ha which equated to 9 years of safeguarding at an average density of 34 dwellings per hectare.</p> <p>Duration: The Council intended to provide 8-10 years’ worth of safeguarded land which when combined with other land would enable the Green Belt boundary to endure for a full 15-year plan period. At paragraph 99 of the Local Plan Strategy Inspector’s Report, the Inspector states: “...<i>taking account of other sources of land, it [safeguarded land] should be sufficient for another full 15-year period beyond 2030, so that the Green Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045.</i>”</p>
Durham County Council Local Plan (October 2020)	<p>Safeguarded Land: No</p> <p>The Council did not identify any safeguarded land in its adopted Local Plan. The Inspector agreed with this approach concluding:</p> <p><i>“It is not possible to know at the current time whether changes will need to be made to other already defined Green Belt boundaries in future reviews of the Plan as that will depend on the amount of development needed at the time, the</i></p>

Local Authority	Arup Summary
	<p><i>spatial strategy for accommodating it, and the availability of non Green Belt sites. It would be premature to attempt to make decisions about any of those factors now...” (Paragraph 77, Local Plan Inspector’s Report).</i></p>
<p>North Warwickshire Council</p> <p>Local Plan (September 2021)</p>	<p>Safeguarded Land: No</p> <p>The Council sought to identify an area of safeguarded land in the submission version of the Local Plan however the Inspector concluded that this was not justified. The Inspector’s conclusion appears to be based on the following factors:</p> <p>Whether it is necessary to safeguard – the Inspector at paragraph 226 of the Inspector’s Report notes that the Plan is contradictory in this regard.</p> <p>The location and approach to the selection of the safeguarded land – the Inspector’s Report at paragraph 225 states: “<i>Kingsbury is a ‘Category 3’ settlement, and there is no robust evidence as to whether safeguarding land for future development there would be preferential to any alternatives (for example related to higher order settlements in line with the settlement hierarchy set via Plan policy LP2). Whilst the examination has not assessed whether any alternative sites would be preferable to those proposed, nevertheless there is little distinction between Green Belt sensitivity in respect of land around Kingsbury relative to the surroundings of other ‘higher order’ settlements such as Coleshill.</i>”</p>
<p>Northumberland County Council</p> <p>Local Plan (March 2022)</p>	<p>Safeguarded Land: Yes – see Policy STP 9.</p> <p>Justification: The Council identified an area of safeguarded land around Morpeth. The Council had quite specific circumstances for identifying safeguarded land due to the fact that they were defining the detailed boundaries for the Green Belt extension around the Morpeth area for the first time. The general extent of this area of Green Belt had already been established within the text of the Northumberland Structure Plan (2005).</p> <p>The Inspector’s Report refers to this area as ‘unallocated white land’ rather than safeguarded land (see paragraph 156) given the Council were establishing the boundaries of this area for the first time. The Inspector did not take issue with this however concluded that the Council would not be justified in identifying any additional areas of safeguarded land. The Inspector’s Report at paragraph 155 states: “<i>There is therefore no justification for a further release of Green Belt land for housing. It is not possible to know at the current time whether changes will be needed to Green Belt boundaries in future reviews of the Plan as that will depend on the amount of development needed at that time, the spatial strategy for accommodating it, and the availability of non-Green Belt sites. It would be premature to attempt to make decisions about any of those factors now, and there are certainly not exceptional circumstances to justify modifying the Plan to take additional land out of the</i></p>

Local Authority	Arup Summary
	<p><i>Green Belt in order to safeguard it to meet unknown development needs after the end of the Plan period.”</i></p> <p>The Council had also sought to safeguard an area of employment land (4ha) which was adjacent to an employment allocation. The Council’s justification was that the safeguarded land could allow the relocation of an existing industrial estate which would then free up a site within the urban area for housing. However, the Inspector’s Report at paragraph 127-130 states that this was not justified, and exceptional circumstances did not exist as there was no evidence for future employment land in the proposed location within the next plan period and it would be very difficult to forecast this at this stage given the changing needs of businesses.</p>
<p>Runnymede Borough Council</p> <p>Local Plan (July 2020)</p>	<p>Safeguarded Land: No</p> <p>The Council did not identify any safeguarded land in its adopted Local Plan. Whilst the Plan had a short time horizon (10 years), the Inspector concluded that the longer term needs were best addressed by a Surrey-wide approach which the authorities had already committed to (paragraph 53, Local Plan Inspector’s Report).</p>
<p>St Helen’s Council</p> <p>Local Plan (July 2022)</p>	<p>Safeguarded Land: Yes – see Policy LPA05.</p> <p>Justification: The Council identified both safeguarded housing sites and safeguarded employment sites. The Safeguarded Land would ensure that the new Green Belt boundaries set by the Plan can endure well beyond 2037.</p> <p>Location:</p> <p>Employment – the employment sites are located adjacent to the strategic road network and within existing well-established employment sites.</p> <p>Housing – the sites achieve a reasonable geographic spread across the Borough, including land adjacent to the St Helens Core Area and Newton-le-Willows/Earlestown.</p> <p>The Council did not seek to distribute the safeguarded sites to each settlement proportionate to the settlement population as the Green Belt Review did not identify enough land suitable for release to enable a distribution.</p> <p>Approach: The Council’s Housing Need and Supply Background Paper (October 2020) at paragraph 3.51-3.57 describes the approach.</p> <p>The Council sought to use a practical and balanced approach being mindful of the uncertainties. The Council did not seek to identify a specific housing need figure for post 2035 and instead identified a reasonable amount of land to be safeguarded in order to meet future development needs. The Council then used the Plan period housing requirement as a basis to measure the provision of safeguarded land. At paragraph 3.53, the Council states: “<i>When projecting forward the housing requirement of 486 dwellings per year, the estimated combined capacity of the sites safeguarded for housing of 2,641 dwellings</i></p>

Local Authority	Arup Summary
	<p><i>equates to 5.4 years of housing supply. If you remove the cap of 500 dwellings applied at site 3HS by Policy LPA06 (based on highway capacity issues), then the safeguarded sites provide for 6.4 years of housing supply."</i></p> <p>The Council also notes that some of the allocated housing sites are expected to continue delivering beyond the plan period. Therefore, based on the Plan period housing requirement of 486 dwellings per annum, this equates to a further 6.9 years of housing land supply. On top of this is the windfall allowance which equates to an additional 1.4 years of supply.</p> <p>At para 3.57 the Council comments on their previous approach: <i>"It is also important to note that the Local Plan Preferred Options (2016) did seek to include 15 years of safeguarded housing land beyond the Plan period, on which the basis was projecting forward the then proposed 570 dwellings per annum housing requirement. However, there was significant opposition to this approach from local residents and stakeholders."</i></p> <p>The Council's Green Belt Review (2018) explains the approach to determining whether sites should be allocated or safeguarded. The safeguarded sites did not score as highly compared to the other employment and housing allocations. Sites with higher levels of deliverability were more likely to be recommended as allocations (as opposed to being safeguarded). Some of the safeguarded sites had highways or access issues, or other physical constraints which would take a longer time to be addressed.</p> <p>Quantum:</p> <p>Employment land – two sites totally 85.88ha. This equates to 8 years supply based on current OAN.</p> <p>Housing land – eight sites totalling 2739 dwellings. This equates to 6 years supply based on the current OAN.</p> <p>The Inspector's Report at paragraph 107 states: <i>"The Plan needs to achieve a balance between protecting Green Belt and ensuring that Green Belt boundaries do not need to be altered again at the end of the Plan period. Moreover, there are uncertainties about what future needs will be or what non-Green Belt opportunities may arise. The Plan achieves an appropriate quantum of safeguarded land and demonstrates exceptional circumstances in this respect."</i></p> <p>Duration:</p> <p>Employment – 8 years supply.</p> <p>Housing - 6 years supply although some of the allocated strategic housing sites are projected to deliver a significant proportion of development beyond the Plan period such that over 3200 homes would be likely to be built on these allocations post 2037, plus windfall sites would provide an additional 1.4 years supply.</p>

Local Authority	Arup Summary
<p>Wakefield Council</p> <p>Local Plan (January 2024)</p>	<p>Safeguarded Land: Yes – see Policy SP4</p> <p>Justification: Safeguarded land is required to ensure that Green Belt boundaries will not need to be altered at the end of the plan period. The vast majority of land outside of the Plan settlement boundaries is Green Belt land and it is unlikely that at the end of the plan period in 2036 adequate amounts of land could be identified that can satisfy development needs within the settlement boundaries proposed for the Plan. It has also been the practice in Wakefield for many years, over a number of plan cycles, to include safeguarded land in development plans in order to ensure a long-term stock of land is identified that can be considered when a new plan is being prepared. In previous plans these areas were called ‘protected areas of search’.</p> <p>Location:</p> <p>The safeguarded sites are located on the periphery of Urban Areas with a geographic spread across the district.</p> <p>Approach:</p> <p>The Council appraised a wide range of potential options and carried out technical site assessment, SA and Green Belt Review and Green Belt Assessment. In relation to the previously safeguarded sites in the Local Development Framework, the Council assessed whether they should continue to be safeguarded taking into account whether they were required to meet identified needs and/or whether they were capable of future development. Some sites were returned back to Green Belt whilst others were allocated or were already under construction.</p> <p>Quantum:</p> <p>The Council sought to provide 5 years supply of housing land. The Council allocated 12 sites as safeguarded land in the Plan (amounting to 144.24ha) – this includes six sites (48.12ha) previously safeguarded in the Local Development Framework which have been carried forward into this plan plus a further six sites (96.12ha) of safeguarded land designated for the first time in this Plan. Not all safeguarded sites in the LDF were carried forward - 103.08ha of land allocated in the LDF as safeguarded land was not carried forward. The sites are safeguarded for housing and employment.</p> <p>The 12 sites amount to 2.5 years supply based on the identified housing target. The Local Plan also identified a further 1,153 dwellings that would come forward on allocated sites beyond 2036 and help to meet longer-term development needs.</p> <p>The Inspector’s Report at paragraph 97-98 states:</p> <p><i>“97. There is some uncertainty regarding the exact extent of future housing needs in Wakefield district beyond the Local Plan period. However, it is reasonable to surmise that there may be some future housing land requirements and that new sites could be required. Given the extensive Green</i></p>

Local Authority	Arup Summary
	<p><i>Belt coverage in Wakefield district, the designation of safeguarded land could be beneficial in helping to provide Green Belt boundaries with a degree of permanence beyond the Plan period.</i></p> <p><i>98. Safeguarded land can provide flexibility and the approach is supported by the NPPF. The Council's decision to designate safeguarded land is, in principle, appropriate. In the absence of national guidance on the amount of safeguarded land that should be identified, I am satisfied that the scale of safeguarded land identified in the Plan is reasonable."</i></p> <p>Duration:</p> <p>The Council sought to provide 5 years supply of housing land. The 12 sites amount to 2.5 years supply based on the identified housing target. The Local Plan also identified a further 1,153 dwellings that would come forward on allocated sites beyond 2036 and help to meet longer-term development needs.</p>
<p>Warrington Borough Council</p> <p>Local Plan (December 2023)</p>	<p>Safeguarded Land: No</p> <p>The Council has not identified any safeguarded land in its Local Plan. In terms of housing land, the Council's justification is that there is sufficient supply beyond the Plan Period due to the ability of the proposed allocations to deliver homes beyond the end of the Plan Period, the anticipated supply of brownfield sites, increased supply of homes over the Plan Period addressing issues of affordability, and the projected slower growth in households over time. In relation to employment land, whilst the Council considered a number of employment sites which scored highly through the Economic Development Needs Assessment, these sites had one or more significant constraints. The Council committed to undertaking a review into Warrington's employment land needs every 5 years and in any event, well before the end of the Plan period.</p> <p>At Regulation 18 stage (Preferred Options), the Council had proposed to safeguard land within the Green Belt for 10 years beyond the plan period however changed this approach due to changes in the above factors.</p> <p>The Inspector Report at paragraph 121 agreed with the Council's approach: <i>"National policy does not require Local Plans to identify safeguarded land. Paragraph 143 of the NPPF states that such land should be identified, where necessary, in order to meet longer term development needs stretching well beyond the plan period. It is not possible at this point in time to forecast what the future needs for housing and employment land may be beyond the plan period. Nor is it possible to predict what an appropriate strategy might be to accommodate them. The South East Warrington Urban Extension (SEWUE) will provide scope for housing development to continue after the plan period and there is a clear commitment to monitor and review the situation regarding development needs. There is no need for the Local Plan to identify safeguarded land."</i></p>

5.3.2 Key Findings

The review demonstrates that the approaches adopted by different local authorities vary significantly. The following section compares and contrasts the approaches on the basis of the justification, location, and the quantum and duration adopted by the local authorities.

5.3.2.1 Justification

Five of the local authorities reviewed (Broxbourne, Durham, North Warwickshire, Runnymede, and Warrington) chose not to safeguard any land beyond the plan period given the uncertainties in predicting longer term development needs and/or given there is sufficient brownfield land to withstand future development pressures and/or some of the allocations will deliver beyond the plan period.

Four of the local authorities reviewed (Barnsley, Cheshire East, St Helen's and Wakefield) did choose to safeguard land beyond the plan period within their adopted Local Plans. They have all taken a slightly different approach to this. For all four local authorities, the justification for safeguarding land is inextricably linked to the exceptional circumstances case relating to the extent of the Green Belt and/or the tightly drawn boundaries around certain parts of the authority area which were constraining development in the most sustainable locations. The safeguarded land would ensure the Green Belt boundaries would endure well beyond the plan period.

Northumberland Council also chose to safeguard land in its adopted Local Plan however the justification for this is very specific to the local circumstances as the Council was defining the detailed Green Belt boundaries around the Morpeth area for the first time, based on the general extent of this area having been established within the text of the Northumberland Structure Plan (2005).

In reviewing the Local Plan Inspector's Reports for all ten local authorities, it is evident that the Inspectors generally agreed with the local authority's decision to either safeguard land or to not safeguard land. There were no examples of an Inspector asking for safeguarded land to be added into the Local Plan where it had not been proposed by the local authority. In some cases where safeguarded land had been proposed, the Inspectors disagreed with the quantity and/or the location of the safeguarded land.

The only example where the Inspector disagreed with the Council's justification for safeguarded land was North Warwickshire Council. North Warwickshire Council identified an area of safeguarded land within the submission version of its Local Plan however the Local Plan Inspector concluded this was not justified as it was unclear if it was necessary and also due to the location and site selection process. As a result, the Council does not have any safeguarded land in its adopted Local Plan.

In relation to Northumberland Council, whilst the Local Plan Inspector accepted the principle of safeguarded land, the Inspector concluded that one of the areas proposed to be safeguarded for employment was not justified as the requirement was not evidenced and it would be very difficult to forecast at this stage. These examples demonstrate the importance of having a clear justification for safeguarded land, backed up by a robust site selection process.

It is evident from reviewing the Local Plan Inspector's Reports that Inspectors recognise the uncertainties in this area with some of the Inspectors highlighting the lack of national guidance and the uncertainties in identifying what future needs might be. Where authorities have identified safeguarded land, the Inspectors have commented on the pragmatic and reasonable approach taken,

referring to the need to achieve a balance between protecting Green Belt and ensuring that Green Belt boundaries do not need to be altered again at the end of the plan period.

5.3.2.2 Location

The safeguarded land in all four authority areas has a geographic spread in locations across the settlement hierarchy. The safeguarded land in St Helen's has a geographic spread across the Borough, including land adjacent to the St Helens Core Area and Newton-le-Willows/Earlestown. The safeguarded land in Barnsley is in locations across the settlement hierarchy, not just Barnsley and the Principal Towns, but also the villages. The safeguarded land in Cheshire East was focused to the north of the borough (as this area was predominantly constrained by Green Belt) and was spread across the Principal Town (Macclesfield), the Key Service Centres and the Local Service Centres. The safeguarded land in Wakefield is focused on the periphery of the Urban Areas. In determining the distribution of the safeguarded land, Cheshire East Council distributed this proportionately by settlement led by the spatial distribution of development and taking into account the resident population of the settlement. This approach was not possible for St Helen's Council as the Council's Green Belt Review did not identify enough land suitable for release to enable a distribution by settlement proportionate to the settlement population.

All four local authorities used evidence including the site selection process, Green Belt review and SA to identify the safeguarded land. The sites selected for safeguarding did not score as highly in the site selection process compared to the other employment and housing allocations and/or they had deliverability issues which were unlikely to be resolved within the plan period.

5.3.2.3 Quantum and Duration

In terms of the quantum of safeguarded land, there are two clear ways to identify the quantum of safeguarded land, either projecting forward current development needs for a specified time period, or to try and make a separate estimate of needs post plan period. All four local authorities chose to project forward current development needs. The duration which the local authorities projected forward was fairly arbitrary ranging from 5 to 10 years and was based on an understanding of the likely sources of supply beyond the plan period. The availability of suitable Green Belt sites for release was also a factor for St Helen's and Barnsley.

Barnsley Council projected forward the annual housing requirement for 5 years after the plan period and deducted the supply likely to come forward on windfall sites. St Helen's Council identified two safeguarded employment sites totally 85.88ha (this equated to 8 years supply) and eight safeguarded housing sites totalling 2739 dwellings (this equated to 6 years supply). Taking into account the windfall allowance and the fact that some allocations would deliver well beyond the plan period, this meant that St Helen's Green Belt boundary was likely to endure for 9 years beyond the plan period. St Helen's Council had previously sought to include 15 years of safeguarded housing land beyond the Plan period (in the Local Plan Preferred Options) however changed this approach due to significant opposition from local residents and stakeholders.

In the case of Cheshire East Council, the Council projected forward development requirements arising from the northern sub-area only rather than the Borough as a whole, given that the Green Belt predominantly constrained land in the north of the borough with no requirement to safeguarded land in the South Cheshire Green Belt. After considering the likely sources of supply beyond the plan period, the Council tested a number of scenarios for timescales (8, 9 and 10 years) and densities (30, 35 and 40dph) which provided parameters for the amount of safeguarded land, ranging from 155ha to 244ha. The midpoint of 200ha was adopted. This was intended to provide 8-

10 years' worth of safeguarded land which when combined with other land would enable the Green Belt boundary to endure for a full 15-year plan period.

Wakefield Council sought to identify a five year housing land supply beyond the plan period – this included 2.5 years supply of safeguarded land, combined with the windfall allowance and the indicative capacity of relevant allocations that would be delivered after the end of the current plan period.

5.3.3 Summary

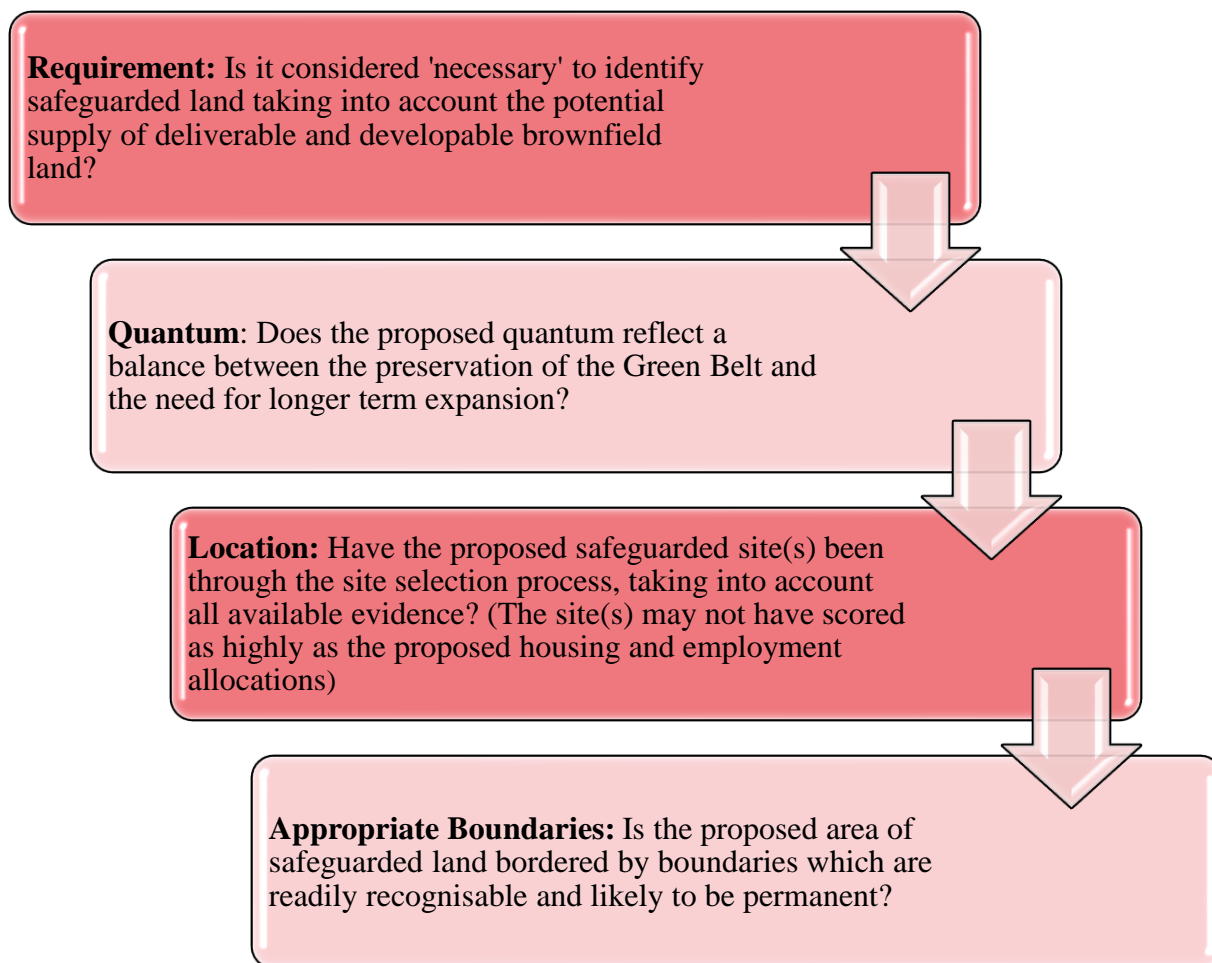
The experience of other local authorities indicates that the need and associated justification for identifying safeguarded land will generally be specific to the circumstances of the particular authority. However, the justification is likely to have regard to factors such as:

- Existing provision of safeguarded land retained from previous plan periods;
- The level of constraints on land supply across the authority including Green Belt and/or other factors such as flooding or national/international environmental designations;
- The supply of urban sites, both brownfield and open spaces, and the likelihood that these will meet future needs beyond the plan period;
- Historic or anticipated rates of recycling of brownfield land and windfall delivery;
- The availability and deliverability of sites, in particular large strategic sites which may deliver housing beyond the plan period;
- The preferences of plan-makers to incorporate a degree of flexibility for future plan iterations;
- The position of the spatial strategy on growth beyond the plan period.

5.4 Recommended Approach

In determining whether safeguarded land is required (plus the quantum and location), Arup recommends that the Council consider the questions in Figure 3 below. The proceeding sections provide more detail on the considerations required at each stage and provide a three-stage approach for the Council to apply.

Figure 3. Arup's recommended process for identifying safeguarded land



5.4.1 Requirement

As set out in Section 5.2 above, paragraph 149 of the NPPF confirms that safeguarded land should be identified 'where necessary.' Some local authorities choose not to identify any safeguarded land taking into account their brownfield land supply and the delivery timescales of their allocations.

The data from windfall completions and assessment of potential supply of deliverable and developable brownfield sites will enable the Council to determine whether it is 'necessary' to identify safeguarded land in order to meet longer term development needs. If there is sufficient brownfield land or there is an over-provision of land within the plan period which would prevent future development pressures compromising the strength of the Green Belt, then it may not be 'necessary' to identify safeguarded land beyond the Plan Period.

Due to the scale and form of the Green Belt in Stoke-on-Trent, the supply of suitable Green Belt sites to safeguard should be considered at this stage. Given that the Green Belt is tight and narrow up to the authority boundary, the availability of suitable Green Belt sites for release will be a determining factor in whether it is possible to identify safeguarded land. This consideration would normally be relevant at Stage 2 however given the scale and location of the Green Belt in Stoke-on-Trent, it may be the case that there are no potential suitable Green Belt sites to safeguard, in which case the remaining stages would be redundant.

Stage 1: Determine whether it is ‘necessary’ to identify safeguarded land by assessing the likely scale of brownfield land and considering whether windfall sites are a reliable source of supply AND determine whether there is a supply of suitable Green Belt sites to safeguard.

If following Stage 1, the Council determines it is either not necessary or possible (due to a lack of sites) to identify safeguarded land, the Council will need to monitor the brownfield supply and windfall completions during the Plan period and consider whether an early review of the Plan is necessary. Where authorities chose not to safeguard land, Local Plan Inspectors acknowledged the uncertainties in both forecasting the future needs for housing and employment land beyond the plan period and in predicting what an appropriate strategy might be to accommodate them.

5.4.2 Quantum

If the Council decide it is necessary to identify safeguarded land and there is a supply of potential sites to safeguard, the next stage is to determine the quantum of safeguarded land required. Paragraph 149 of the NPPF confirms that the safeguarded land should “...*meet longer-term development needs stretching well beyond the plan period.*”

It is clear from the review of approaches taken by other local authorities that there are two ways to identify the quantum of safeguarded land, either projecting forward current development needs for a specified time period, or to undertake a separate estimate of needs post plan period. The four local authorities who identified safeguarded land all chose to project forward current development needs. The availability of suitable Green Belt sites for release was a key factor for St Helens and Barnsley. In determining the quantum of safeguarded land in Stoke-in-Trent, it is likely that this will be largely driven by the availability of suitable Green Belt sites to safeguard. The Council can still project forward development needs and consider this against the potential supply of suitable Green Belt sites.

The duration which other local authorities have projected forward is fairly arbitrary ranging from 5 to 10 years. None of the local authorities reviewed chose to project forward for a full plan period (15 years). The local authorities identified the duration based on an understanding of the likely sources of supply beyond the plan period (for example, brownfield recycling and windfall allowance) and in some cases the availability of suitable Green Belt sites for release. Arup would usually recommend 10 years as a reasonable starting point to project forward based on experience elsewhere however there is unlikely to be a sufficient supply of Green Belt sites in Stoke-on-Trent to project forward this far and therefore 5 years provides a more realistic starting point in this context. This is likely to mean that there will be more reliance on brownfield recycling and windfall supply in the next plan period.

Stage 2: Project forward current development needs for a specified duration and consider this against the availability of suitable Green Belt sites for release.

Arup recommends 5 years would be a reasonable starting point relevant to the local context.

It is recommended a ‘straight line projection’ is used when determining the amount of land required over the 5-year period. Adjustments to take account of economic or demographic changes are not considered appropriate when determining the quantum of safeguarded land due to limitations associated with identifying and applying a consistent approach to adjustment factors.

In order to convert the annual housing requirement into a land requirement, the Council can either apply a standard average density or it could test different scenarios. Cheshire East Council tested

different scenarios for both the duration (8, 9 and 10 years) and the density (30, 35 and 40dph) to be applied which provided parameters for the amount of safeguarded land required.

5.4.3 Location

The review of approaches taken by other local authorities demonstrates that the location of safeguarded land is specific to the local context of the authority. Some local authorities identify safeguarded land on the edge of proposed allocations whilst others identify these in completely separate locations. The experience of other local authorities identifies the need to ensure that safeguarded land supports the delivery of sustainable development and aligns with the overall spatial strategy of the Local Plan.

Based on the approaches adopted by other local authorities it is clear that in identifying where the safeguarded land should go, a clear site selection process needs to have been applied which takes into account a variety of evidence including a Green Belt review and SA. The sites selected as safeguarded land often do not score as highly in the site selection process compared to the other employment and housing allocations and/or they had deliverability issues which were unlikely to be resolved within the plan period.

Stage 3: In order to identify which sites should be safeguarded, apply the site selection process, considering all relevant evidence including the Green Belt Review, SA, and the overall spatial strategy.

5.4.4 Appropriate Boundaries

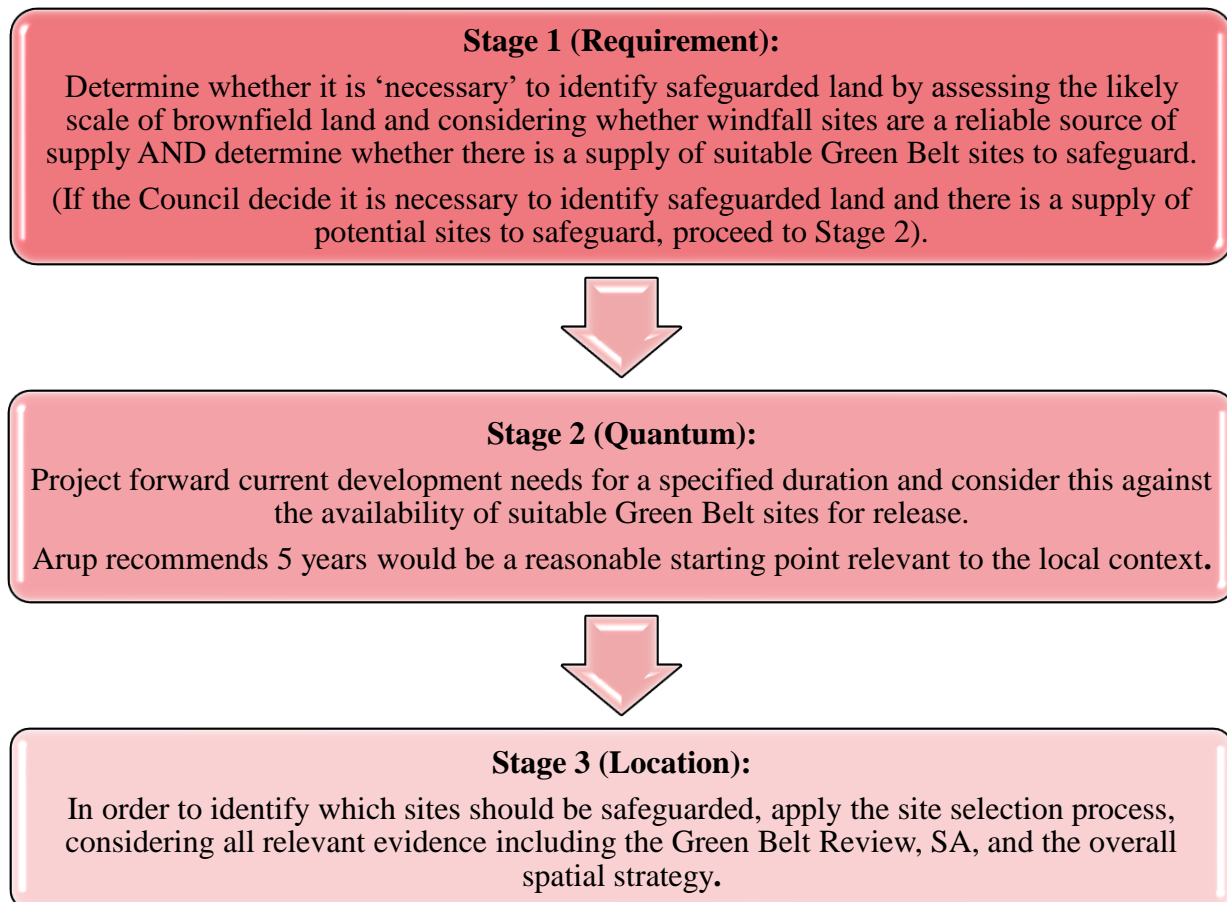
The consideration of appropriate boundaries is already embedded into the Green Belt site assessment process. The previous Green Belt Assessment Part 1 (November 2017) in section 4.4.1 identifies the boundary features which are readily recognisable and likely to be permanent (durable boundaries) and less durable boundaries.

The Green Belt Assessment Part 2 (December 2020) considered the boundary strength of the sites as part of the assessment process. In assessing the ‘Green Belt Implications’, the assessment asks: *‘Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?’* If the resultant boundary features are not recognisable and permanent, it is recommended that if the site is taken forward, the accompanying policy will need to specifically state that a recognisable and permanent new Green Belt boundary must be provided or the existing boundary requires strengthening.

5.4.5 Summary

Based on national policy and guidance, and the approaches taken by other local authorities, it is recommended that the Council undertake the three-stage approach set out in Figure 4 below in order to determine firstly whether safeguarded land is ‘necessary’, and if it is, then to determine the quantum and location. In applying the three-stage approach below, the findings from other related studies and evidence should be taken into account including the: Housing and Employment Needs Assessment Update, Strategic Housing and Employment Land Availability Assessment, Five Year Land Supply Statement 2023, Green Belt Assessments Part 1 and Part 2, Sustainability Appraisal, emerging spatial strategy work, and emerging Site Selection work.

Figure 4. Recommended three stage approach to identifying safeguarded land



6. Green Belt Village Assessment

6.1 Introduction

This section sets out a methodology for the definition of a ‘village’ and provides an assessment as to whether Stoke-on-Trent has any villages which are either inset and/or washed over by the Green Belt. The context to this assessment links to the appeal decision at Norton Green in 2022 (Ref: APP/M3455/W/22/3299359)¹¹ where the Inspector determined that Norton Green was a village due to its scale and the presence of commercial uses.

The appeal was made against Stoke-on-Trent Council following their refusal for the development of three dwellings at 168 Endon Road, Norton Green. The main issue was whether the proposal would be inappropriate development in the Green Belt or whether it would fall within the exception category at paragraph 149 NPPF 2021 (now paragraph 150 NPPF 2024) of being limited infilling in a village.

The main parties disagreed as to whether Norton Green was a village. The Council’s position was that Norton Green was either a hamlet or part of the urban fringe associated with Stoke-on-Trent. The Council considered that a village must be served by a church, which Norton Green no longer has.

The Inspector at paragraph 12 sets out his observations on Norton Green: *“Norton Green is characterised by a somewhat dense level of development. It is also of a fair size, covering a large portion of the area between Norton-in-the-Moor and Brown Edge. I find that its size and the level of residential development present is significantly greater than what would typically be considered a hamlet. During my observations on site, I noted that the settlement contained a public house, hairdressers and care home.”*

At paragraph 13, the Inspector considers the definition of a village: *“Lacking any definitive definition for the purposes of planning, I find that a village would be a small settlement that, in size, sits between a hamlet and town, and would provide some access to services or facilities, such as a church. To this end I have made a judgement based on the situation on the ground. Given its scale and the presence of commercial uses, I find that whilst Norton Green is no longer served by a church, this is more likely a result of social change amongst its residents than a diminishing of the settlement’s importance. Consequently, in my mind it would be more accurate, for the purposes of this Green Belt assessment, to consider the settlement as a village.”*

The Inspector concluded that development would be limited infilling in a village and would not be inappropriate development in the Green Belt. The appeal was allowed.

Taking into account the Inspector’s comments on the Norton Green appeal as well as other appeal decisions, case law, and similar studies from other local authorities, a methodology for determining whether Stoke-on-Trent has any villages has been set out below.

The focus of this assessment is on the definition of a village rather than paragraph 150 of the NPPF (December 2024) which considers whether a village should be washed over or inset.

¹¹ [Norton Green appeal decision document link](#)

6.2 National Policy and Guidance

The NPPF and PPG do not provide a definition of a village however a number of paragraphs in the NPPF refer to a village (for example paragraph 83 in the context of identifying opportunities for village to grow, paragraph 150 in the context of whether a Green Belt village should be washed over or inset, and paragraph 154 in the context of limited infilling in villages not being regarded as inappropriate development in the Green Belt).

6.3 Case Law

Given the lack of definition regarding what constitutes a village, it is necessary to consider case law. The following High Court decision and planning appeal decisions discuss this matter.

R (Tate) v Northumberland County Council [2017] EWHC 664 (Admin)¹²

This case concerned whether a settlement was a village for the purposes of the penultimate bullet point of NPPF 2012 paragraph 89 (now paragraph 154) relating to limited infilling in village. The Judge concluded that subjective decisions are to be made on the facts of the case and made collectively by those exercising planning judgement. At paragraph 25, the Judge states “...*the question of whether a given settlement is, or is not, a village, is inevitably a matter of planning judgement.*” (paragraph 25).

Appeal Ref: APP/R0660/W/22/3309428¹³ - The Elms, Plumley Moor Road, Lower Peover WA16 9SE (2023)

This case centred on whether the proposal would be inappropriate development in the Green Belt. The appeal site is located in Lower Peover. Cheshire East Council’s Site Allocations Development Plan Document (SADPD) at Policy PG10 list of the infill villages within Cheshire East. Lower Peover is not listed as a village. The Inspector notes at paragraph 13: “*Lower Peover is characterised by a collection of dwellings which are dispersed over several lanes. Lower Peover has a pub/restaurant, primary school and church, which I walked to on my site visit. The appellant has also drawn my attention to a number of other facilities and services within Lower Peover. In my view, the number of facilities and services in Lower Peover is limited.*”

The Inspector noted the case of Julian Wood v SSCLG and Gravesham Borough Council where the boundary of a village defined in a local plan was considered to be a relevant consideration but not determinative and it was deemed necessary to consider the situation ‘on the ground’ as well as relevant policies. The Inspector concluded this case was not directly comparable and each case should be considered on its own merits regardless. At paragraph 15, the Inspector concludes: “*Policy PG 10 of the SADP clarifies which settlements are considered to be villages for the purposes of limited infilling allowed under CELPS policy PG 3. Given that Lower Peover is not listed as a village in Policy PG 10 of the recently adopted SADPD, the characteristics of the area (including dispersed nature of the settlement) and limited services and facilities, the proposed development would not constitute limited infilling in a village.*”

¹² [R \(Tate\) v Northumberland County Council judgement summary](#)

¹³ [The Elms appeal decision document link](#)

The Inspector concluded that the proposal would amount to inappropriate development and the appeal was dismissed.

Appeal Ref: APP/F2360/W/19/3238776¹⁴ - Moss Farm, 25 Midge Hall Lane, Midge Hall, Leyland, PR26 6TN

This case centred on whether the proposal would be inappropriate development in the Green Belt. The appeal site was located in Midge Hall and the appellant argued that the proposal constituted limited infilling within the village of Midge Hall which the Council disputed. The Council did acknowledge that the appeal site was part of a small community with some community facilities which may be loosely termed a village, with reference to a suggested definition that a ‘village is larger than a hamlet but smaller than a town’. However, the Council considered that the site was “...on the edge of the settlement and that the proposal would constitute an extension of the village ‘away from its albeit limited natural centre’” (paragraph 8).

At paragraph 9, the Inspector concluded that the appeal site “...forms part of a linear pattern of development... The land uses are mixed, including a significant number of residential properties, relatively large commercial premises and also a church. In my judgement, the pattern of development I have described can be reasonably regarded as forming part, if not the whole, of a village, within which the appeal site is located. To my mind, that element of the criteria is satisfied and, in this context, it is of little relevance that the proposal would be located towards one end of the village and away from what the Council might regard as its ‘natural centre’.”

The Inspector concluded that the proposal would not amount to inappropriate development in the Green Belt and the appeal was allowed.

Appeal Ref: APP/B3438/W/18/3211000¹⁵ - Land off Tongue Lane, Brown Edge ST6 8UH (2019)

This case centred on whether the proposal would be inappropriate development in the Green Belt. The parties disputed whether the location of the appeal site (a group of 18 residential dwellings known as Ridgeway) was a village or a hamlet. The Inspector at paragraph 4 of the appeal decision refers to the Oxford Dictionary definition: “The Oxford Dictionary defines a village as a group of houses and associated buildings, larger than a hamlet and smaller than a town, situated in a rural area. It defines a hamlet as a small settlement, generally one smaller than a village, and strictly (in Britain) one without a Church.”

Based on this, the Inspector concludes that Ridgeway is a hamlet, stating: “While a church may have once existed in Ridgeway, there is no church there now as it has been replaced by a dwelling known as Chapel House. There are also no other associated buildings in Ridgeway that would, in my judgement, mean that Ridgeway is anything more than a hamlet.” (paragraph 4). At paragraph 8, the Inspector also notes that “...[e]xcept for a telephone box and a post box there are no shops or services in Ridgeway.”

The Inspector concluded that the proposal amounted to inappropriate development in the Green Belt and the appeal was dismissed.

¹⁴ [Moss Farm appeal decision document link](#)

¹⁵ [Land off Tongue Land appeal decision document link](#)

Appeal Ref: APP/P1940/W/17/3183388¹⁶ - Land adjoining 1 Cecil Lodge Cottage, Bedmond Road, Abbots Langley, Herts WD5 0QB (2018)

This case centred on whether the proposal would be inappropriate development in the Green Belt. The proposal was located in Abbots Langley which was designated as a Key Centre in the settlement hierarchy of the Core Strategy. The Core Strategy identified two villages, and the appeal site was not located within one of these villages. The Council had concluded that Abbots Langley was not a village as it was a larger settlement, more akin to a town. As such paragraph 89 relating to limited infilling in villages did not apply. The Inspector at paragraph 7 notes that “...*the Framework does not specify that a village must be designated as such in the development plan. Neither does it specify any limitation to the size a village can be.*”

At paragraph 8, the Inspector goes on to state: “*Notwithstanding its size, the sense and identity of Abbots Langley as a distinct settlement is defined by its extensive boundaries with open countryside and separation to the adjacent settlement of Leavesden. The appellant has pointed to Abbots Langley being referred to as a village on the Council’s web site, on entrance signs at either end of the High Street and in documents relating to local community groups. The formal designation of Abbots Langley in the current development plan as a “Key Centre” in the settlement hierarchy may not be picked up in common parlance and there is evidence that locally it is sometimes known as a village. On this basis it is my judgement that Abbots Langley can be regarded as a “village” for the purposes of paragraph 89.*”

The Inspector concluded that the proposal would constitute limited infill within a village and the appeal was allowed.

Appeal Ref: APP/K0425/W/17/3188568¹⁷ - Land adjacent to Thornbury, Frieth Road, Bovingdon Green, Marlow, SL7 2JQ (2018)

This case centred on whether the proposal would be inappropriate development in the Green Belt. The appeal site was located in Bovingdon Green which was classed as a rural settlement washed over by the Green Belt in the Council’s Local Plan. At paragraph 14, the Inspector noted that “...*it is not clear from the submitted evidence whether Bovingdon Green is officially classified as [a village].*”

At paragraph 15, the Inspector concludes: “*At my site visit, I undertook a wider inspection of the settlement and concluded that while Bovingdon Green may have originally been a small pocket of isolated dwellings or hamlet, that it has now grown and evolved into a larger settlement, visually distinct and separate from the town of Marlow, and which benefits from its own Village Hall, ‘Green’ and Public House. Having considered all of these characteristics collectively, I have concluded that it would be appropriate to classify Bovingdon Green as a village for the purposes of Paragraph 89 of the Framework.*”

The Inspector concluded that the proposal would not constitute inappropriate development in the Green Belt and the appeal was allowed.

¹⁶ [Cecil Lodge Cottage appeal decision document link](#)

¹⁷ [Land adjacent to Thornbury appeal decision document link](#)

6.3.1 Summary

The Courts have determined that whether a settlement is a village is a matter of planning judgement.

The appeal decisions demonstrate that there is no clear definition of what constitutes a village, and the decision turns on the facts of the case. The Oxford Dictionary definition that a village is larger than a hamlet but smaller than a town was cited in a number of the appeal decisions. A hamlet was defined as a settlement smaller than a village and strictly (in Britain) one without a Church.

In determining whether a settlement was a village, the appeal Inspectors often cited the presence of a mix of uses including residential properties along with commercial uses, a village hall, a public house, and/or a church. The Inspectors in some cases also commented on the form and pattern of development. In the Brown Edge (Ridgeway) appeal decision, the lack of any shops or services meant that the Inspector concluded the settlement was a hamlet. It is relevant to note that the appeal site in that decision was located in neighbouring Staffordshire Moorlands, in very close proximity to the Stoke-on-Trent authority boundary.

In the Lower Peover appeal decision, Cheshire East Council's recently adopted SADPD which identified a list of infill villages as part of Policy PG10 was deemed to be determinative even though Lower Peover did have a few services and facilities (including a pub/restaurant, primary school and a church). The evidence base accompanying this policy was the Council's Settlement and Infill Boundaries Review.

6.4 Approaches taken by other local authorities

Given the lack of a policy or guidance definition of what constitutes a village, it is useful to consider the differing approaches taken by other local authorities.

Some local authorities consider the definition of villages when determining their settlement hierarchy whilst others consider this specifically in relation to applying paragraph 154 NPPF relating to 'limited infilling in villages'. As such, not all local authorities undertake such studies and the number of relevant examples to review is not extensive.

The approach taken by the following three local authorities has been reviewed:

- Cheshire East Council
- Basingstoke and Deane Council
- St Albans City and District Council

Only Cheshire East Council has been through Examination in Public with the Site Allocations Development Plan Document having been adopted in December 2022.

A summary of the approaches taken is set out below and the full review table including relevant extracts from documents and links to sources is included at Appendix A.

6.4.1 Definitions

Cheshire East Council did not have an explicit definition of a 'village', but these fell within the 'other settlements and rural areas' tier of their settlement hierarchy. This is defined as 'settlements containing few or no services and facilities, with limited or no access to public transport, very limited or no employment opportunities'.

Basingstoke Council in their adopted Local Plan defined a ‘settlement’ as ‘typically consisting of a village, comprised of more than a group of houses, or farmstead, including at least one service or facility, such as a village hall, public house, or school’.

St Albans Council in their adopted District Plan had not explicitly defined villages but in their settlement hierarchy identified ‘Specified Settlements’ as being ‘larger villages generally of 2000-5000 population excluded from the Green Belt’ whereas ‘Green Belt Settlements’ were ‘smaller villages within the Green Belt’.

6.4.2 General approach

Both the St Albans study and the Basingstoke study were Settlement Hierarchy studies. Given that the St Albans study was focused on all settlements within the district, a numerical scoring system was applied based on four factors (population, accessibility, services and facilities, and employment). This allowed the settlements to be ranked and applied to the Council's classification based on seven tiers of settlements.

The Basingstoke study took a similar approach but applied more of a qualitative assessment based on four key steps (Step 1: identifying which settlement should be assessment; Step 2: settlement audit based on services/facilities, access, size and employment; Step 3: creating settlement categories; and step 4: assigning settlements to categories).

The Cheshire East study is slightly different given that the approach to defining villages specifically relates to villages only and is intended to assist with the interpretation of limited infilling in villages linked to the Council's policy on infill villages. The Local Plan Inspector's Report notes that the method for this was 'robust and consistently applied' (paragraph 119).

Overall, all of the examples followed a similar general approach:

1. Identification of settlements to consider.
2. Consideration of some or all of the following:
 - a. Level of service/facility provision
 - b. Accessibility / availability of public transport
 - c. Size (population)
 - d. Employment
 - e. Coherence of spatial form
3. Based on above, categorisation/determination as to whether the settlement is a village (or in another tier).

All of the examples considered the following as part of the assessment:

- Level of service/facility provision
- Availability of public transport / accessibility
- Size in term of population

In addition, both Cheshire East and Basingstoke also considered spatial form and whether this was coherent without extensive breaks in frontages.

Both Basingstoke and St Albans applied a size threshold in terms of population. Cheshire East only applied a population threshold to settlements which were considered borderline - acknowledging the difficulty in obtaining data on populations of small settlements.

6.4.3 Identification of settlements to assess

The Cheshire East study used the existing settlement hierarchy which already listed all settlements under consideration. Both the Basingstoke and St Albans study used GIS data to determine the settlement areas to be considered. Basingstoke identified areas of housing close to key services or facilities to assess taking into account the cohesiveness of the settlement, the scale and character, the presence of key services or facilities, and a size threshold of at least 150 residents. Although St Albans already had settlements identified through the adopted Local Plan, there had been more recent development and encroachment in the Green Belt which meant that this needed to be reviewed to take this into account.

6.4.4 Service/facility provision

It is clear from all of the studies that the presence of certain services/facilities on its own would not constitute a village. Other factors need to be considered.

Cheshire East Council had a long list of potential services and facilities with three or more required to satisfy the first stage of the process.

Basingstoke identified 'key services and facilities' consisting of convenience shops, post office, primary school, public houses, and village and community hall. In order for the settlement to be classed as a small village, it was required to have at least two of these services/facilities (alongside other considerations). To qualify as a medium village, it was required to have all four services/functions, in addition to other facilities and amenities (alongside other considerations).

St Albans identified key services as being primary school, playground, convenience food shop, and GP surgery. Higher order services were also considered. The settlements were given a score based on the number of key services and higher order services present.

6.4.5 Accessibility / availability of public transport

The approach to considering accessibility differed between the studies. Cheshire East stated that any availability of public transport was considered sufficient for a settlement to be considered a potential village regardless of service frequency (albeit public transport availability alone did not constitute a village).

Basingstoke considered the accessibility to services and facilities (including bus services and railway station) more generally applying a distance buffer based on 800m, 5km, and 8km of the settlement. St Albans applied a score based on the accessibility to strategic cycle routes, strategic bus routes, and branch and mainline railway stations.

6.4.6 Population

The Cheshire East study highlighted the difficulties in obtaining reliable population data for small settlements given that the Census output areas do not always map neatly to settlements therefore an estimate of population is required. As a result, information from the Local Land and Property Gazetteer was used to count the number of properties and multiply this by the estimated household size. In Cheshire East, only those settlements which were borderline required a consideration of

population. Settlements with a population of at least 500 were deemed sufficient to count as a village.

The St Albans study calculated the population figures using the defined settlement area taken from the Local Plan Review 1994 and identifying Address Gazetteer points within that area to identify the number of residential dwellings. This figure was then multiplied by 2.4 (a proxy for number of residents per dwelling in the district) to calculate the approximate population within the defined settlement area. A set number was not applied to count as a village as a comparison against the other tiers of settlement was applied instead.

The population data in the Basingstoke study was based on Hampshire County Council's Small Area Population Forecasts (2019) or in the absence of any data in that document, it was based on an approximation of the built up area. A size threshold of 150 residents for a small village, over 2000 residents for a medium village, and over 4000 residents for rural towns and large villages was applied.

6.4.7 Other considerations

Employment

Only the St Albans study considered access to employment applying a numerical score based on the presence of an employment allocation.

Spatial form

The Basingstoke study considered the form of the settlements and whether it was cohesive (for example without extensive breaks in the frontages), in addition to the scale and character of the settlement (to sieve out hamlets and farmsteads) - this was undertaken as part of Step 1.

The Cheshire East study considered whether the settlement had a relatively coherent spatial form - this was undertaken on a desktop basis supplemented by site visits where necessary. A critical mass of development/clear cluster(s) of development/clear centre to the settlement indicated a coherent spatial form compared to small clusters of houses/sparsely located properties/lack of any critical mass which indicated the lack of a coherent spatial form.

6.4.8 Categorisation/determination

All the studies considered all of the criteria in the round in order to come to a decision - no single element was determinative or given more or less weight.

Given the Basingstoke and St Albans studies were focused on settlement hierarchy, they provided a definition of various tiers of settlements including small, medium and large villages. Based on the assessment, it was then determined as to which category the settlement fell within.

The Cheshire East study required all three criteria to be met (three or more service/facility provision, availability of public transport, and presence of a coherent settlement) in order for the settlement to be a village. If it only met two criteria, it was borderline and population was considered. If it only met one criterion, it was not deemed to be a village.

6.5 Methodology

Taking into account the findings from Section 1.2, 1.3 and 1.4 above, the following methodology will be applied to determine whether Stoke-on-Trent has any villages which are either washed over

or inset within the Green Belt. The methodology is intended to be applied based on a desktop assessment only.

6.5.1 Step 1: Identification of settlements to consider

Based on a review of existing evidence including the adopted Stoke-on-Trent and Newcastle-under-Lyme Core Strategy (2009) and the Joint Green Belt Assessment Part 1 (2017), relevant settlements will be identified for consideration.

An analysis via GIS will be undertaken to identify any further settlements which may need to be considered. In order to do this, open-source OS Unique Property Reference Number (UPRN) data will be used. This data shows every spatial address in Great Britain and includes all buildings, for example residential or commercial, as well as ‘objects’ that may not have a postal address such as bus shelters. Using the OS UPRN data combined with Google Maps, the areas of Green Belt surrounding the Stoke-on-Trent urban area will be analysed to identify the presence of clusters of residential properties, either washed over or inset within the Green Belt, which may have the potential to constitute a village. In the case of inset settlements, due to the shape and form of the Stoke-on-Trent urban area, it is acknowledged that these settlements may not be completely separate from the urban area and may be connected to it. As evident in the Norton Green appeal decision (see Section 2.1 above), although Norton Green is connected to the urban area along Endon Road, it was still considered to be a village by the Inspector. The level of connection will therefore be taken into account and settlements which clearly form a contiguous part of the urban area will not be considered.

The analysis will consider whether the residential properties collectively form a ‘cluster’ of development and whether that cluster has a coherent spatial form.

For the purposes of the assessment, a ‘cluster’ of residential properties will consist of 20 or more residential properties (as identified from the OS UPRN data). As there is no set definition for the number of properties that would constitute a village compared to a hamlet, 20 has been used as a minimum in order to set a low threshold for the assessment. The Brown Edge (Ridgeway) appeal (see Section 2.3 above) considered 18 properties to be a hamlet therefore by setting a low threshold, this ensures that settlements of such sizes will then proceed to Step 2 to be fully assessed, and size alone will not be the determining factor. In addition, given there is no accepted definition for the maximum number of properties that would constitute a village compared to a town, the example studies considered in Section 2.4 have been used to help define this. The Cheshire East study did not set a maximum population size. The St Albans study did not define the population size in each tier of the settlement hierarchy and a comparative approach was instead taken. The Basingstoke study applied 150 residents for a small village (equivalent to 63 dwellings assuming this was based on 2.4 people per dwelling), 2000 residents for a medium village (equivalent to 833 dwellings) and 4000 residents for a rural town/large village (equivalent to 1666 dwellings). In the context of Stoke-on-Trent, it is considered that a maximum threshold of 900 dwellings will be appropriate given the predominantly smaller scale of the settlements surrounding the urban area.

To determine if a cluster of properties has a coherent spatial form, the properties should provide a critical mass of development either in a cluster or a linear form. There should not be large gaps between properties or breaks in the building line or property frontages. The building line should be identifiable and relatively consistent around the cluster. Sparsely located properties which are either set back or separate from the building line should not be counted as part of the cluster.

In order for the settlement to proceed to Step 2, the cluster of properties should include 20 or more residential properties and it should have a coherent spatial form. A boundary for the settlement will

be defined for the purposes of the assessment encompassing the built up area and coherent spatial form.

6.5.2 Step 2: Settlement audit

In undertaking Step 2, the level of service/facility provision and the availability of public transport should both be taken into account. The boundary for the settlement defined in Step 1 will be used to undertake the settlement audit. Both factors must be met in order for the settlement to be considered a village.

Step 2A: What is the level of service/facility provision?

The services or facilities in the settlement should be identified. The following services or facilities are likely to be most relevant however this list is not exhaustive and other commercial, or community uses may also be relevant, for example a hairdresser, leisure centre, cinema or museum/gallery.

- Bank
- Café/restaurant
- Convenience store
- Dentist
- GP
- Library
- Nursery (creche)
- Pharmacy
- Place of worship
- Post office
- Primary school
- Pub
- Village green or children's play area
- Village/community hall

From the case law considered in Section 2.3, where there were two or more services or facilities present, this assisted the Inspectors in determining that the settlement was a village (alongside other factors). Particularly relevant is the Norton Green appeal decision where the Inspector identified three services/facilities being present – a public house, hairdressers and care home. In the Brown Edge (Ridgeway) appeal, the lack of any shops or services led the Inspector to conclude that the settlement was a hamlet and not a village. From the other example studies considered in Section 2.4, Cheshire East required three or more services and facilities to satisfy the first stage of the process. For the settlement to be classed as a small village, the Basingstoke study required at least two services/facilities (alongside other considerations). The St Albans study defined a Green Belt village as having 'some or few key services'. The Basingstoke and St Albans studies had a stricter definition of services and facilities compared to the Cheshire East study with only 'key services'

being relevant. These were defined as primary school, playground, convenience food shop, and GP surgery in the Basingstoke study, and convenience shop, post office, primary school, public house, and village/community hall in the St Albans study.

For the purposes of this assessment, if the settlement has two or more services or facilities, it has the potential to be a village, subject to the findings of Step 2B. An element of professional judgement should be applied in determining the relevance of the services or facilities in the settlement. If the service/facility is particularly specialist in nature (i.e. it would not be relevant for the vast majority of the community) and/or it is not something which is frequently used/visited, then it should not be counted.

This approach aligns with the case law and examples considered whilst also being relevant to the local context of Stoke-on-Trent. Given the location of many of the potential settlements under consideration and their proximity to the Stoke-on-Trent urban area, it is likely that many residents in these settlements will use the services and facilities within the urban area and as such these settlements are less likely to have dedicated services/facilities within them. The relatively low threshold of two or more services or facilities for this step is therefore cognisant of this.

Step 2B: Is there any public transport availability?

The public transport provision in the settlement should be identified – this should consider whether there is a railway station or a bus stop in the settlement, regardless of the service frequency.

If the settlement has public transport availability, it has the potential to be a village, subject to the findings of Step 2A.

Step 2C: Determining whether the settlement is a village

In order to determine whether the settlement is a village, the findings from Step 2A and 2B should be taken into account as follows:

- If the settlement meets both factors, it should be considered a village.
- If the settlement meets one or none of the factors, it is not considered a village.

6.6 Assessment

6.6.1 Step 1: Identification of settlements to consider

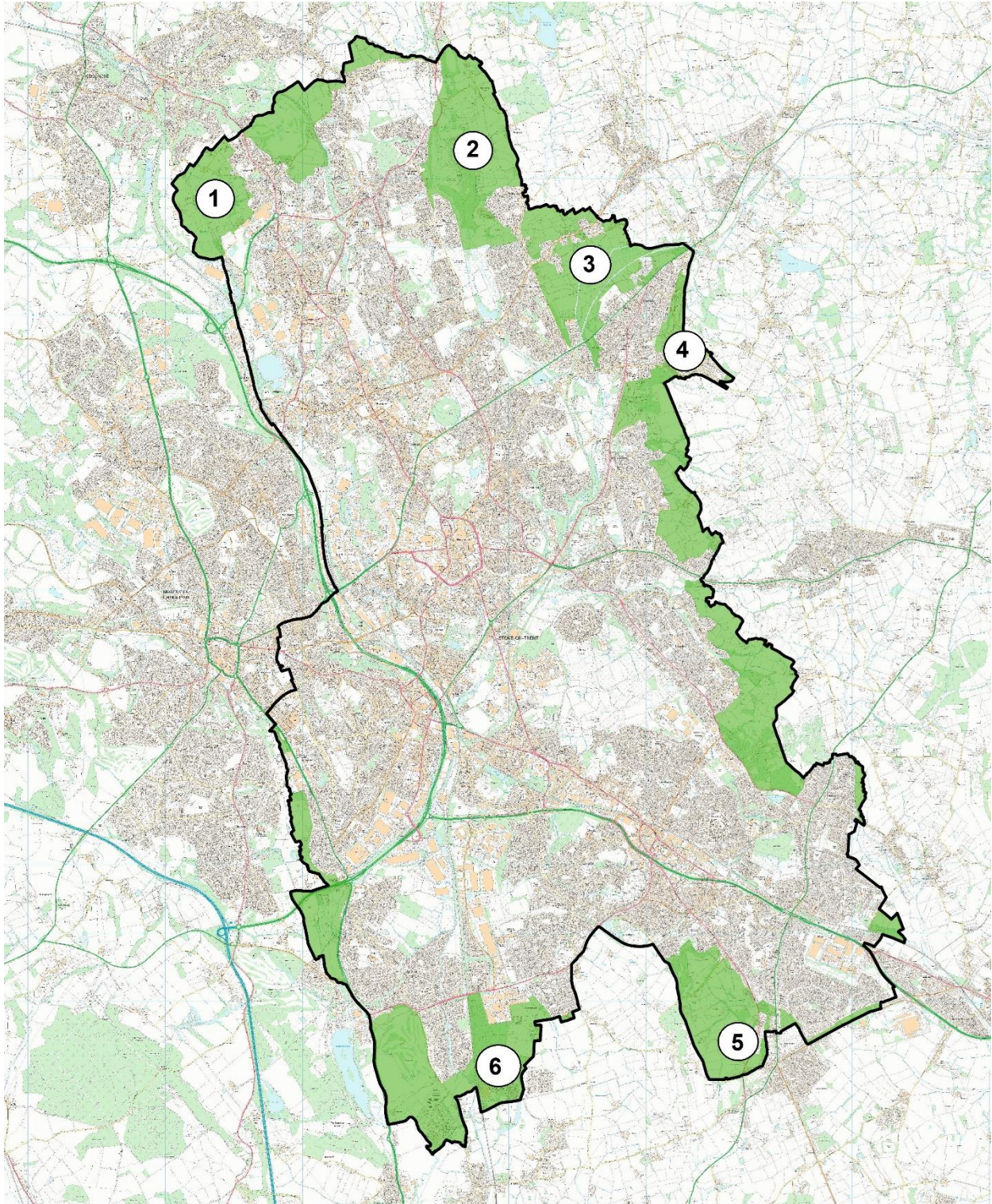
The adopted Stoke-on-Trent and Newcastle-under-Lyme Core Strategy (2009) includes a settlement hierarchy which identifies a number of villages: Betley, Mow Cop, Keele, Madeley Heath, Baldwins Gate, Ashley and Whitmore. All of these are located in Newcastle-under-Lyme and no villages are identified within Stoke-on-Trent.

As part of the Joint Green Belt Assessment Part 1 (2017), a number of ‘towns’ were identified in order to assess Purpose 2 (preventing neighbouring towns from merging). At p30, the methodology lists out the defined ‘neighbouring towns’. For Stoke-on-Trent, these are Baddeley Edge/Light Oaks and Norton Green. It notes that this list includes towns, villages and settlements and not all of them would properly be defined as ‘towns’ under normal circumstances. The North Staffordshire Green Belt Local Plan was used to identify these ‘towns’ given that it lists the towns and settlements which the North Staffordshire Green Belt was intended to prevent the merging of. Baddeley Edge/Light Oaks and Norton Green will therefore need to be considered.

In order to identify other settlements to consider, an analysis via GIS has been undertaken to identify clusters of 20 or more residential properties which together have a coherent spatial form. The findings of the GIS analysis are set out below.

Clusters of residential properties were identified in the following six locations.

Figure 5. Locations of clusters of residential properties considered as part of Step 1



Location 1

To the north west of the urban area, there is a cluster of approximately 37 properties which is washed over by the Green Belt and which has a clearly defined coherent spatial form. This is located around Boathorse Road however this is a mobile home park and therefore would not constitute a village. This will not proceed to Step 2.

Figure 6. Location 1: Boathorse Road

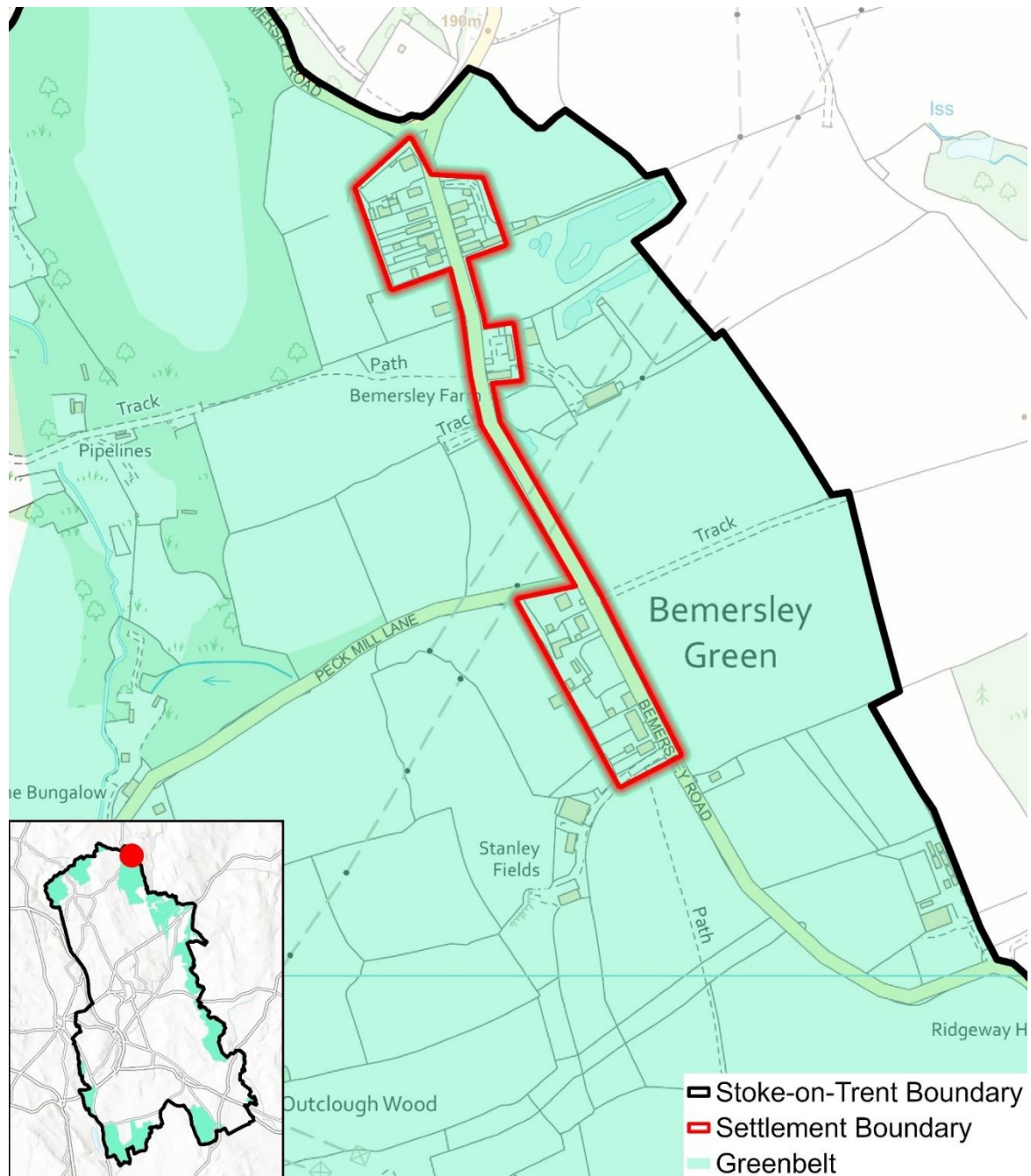


Location 2

To the north east of the urban area, there are two clusters of residential properties washed over by the Green Belt.

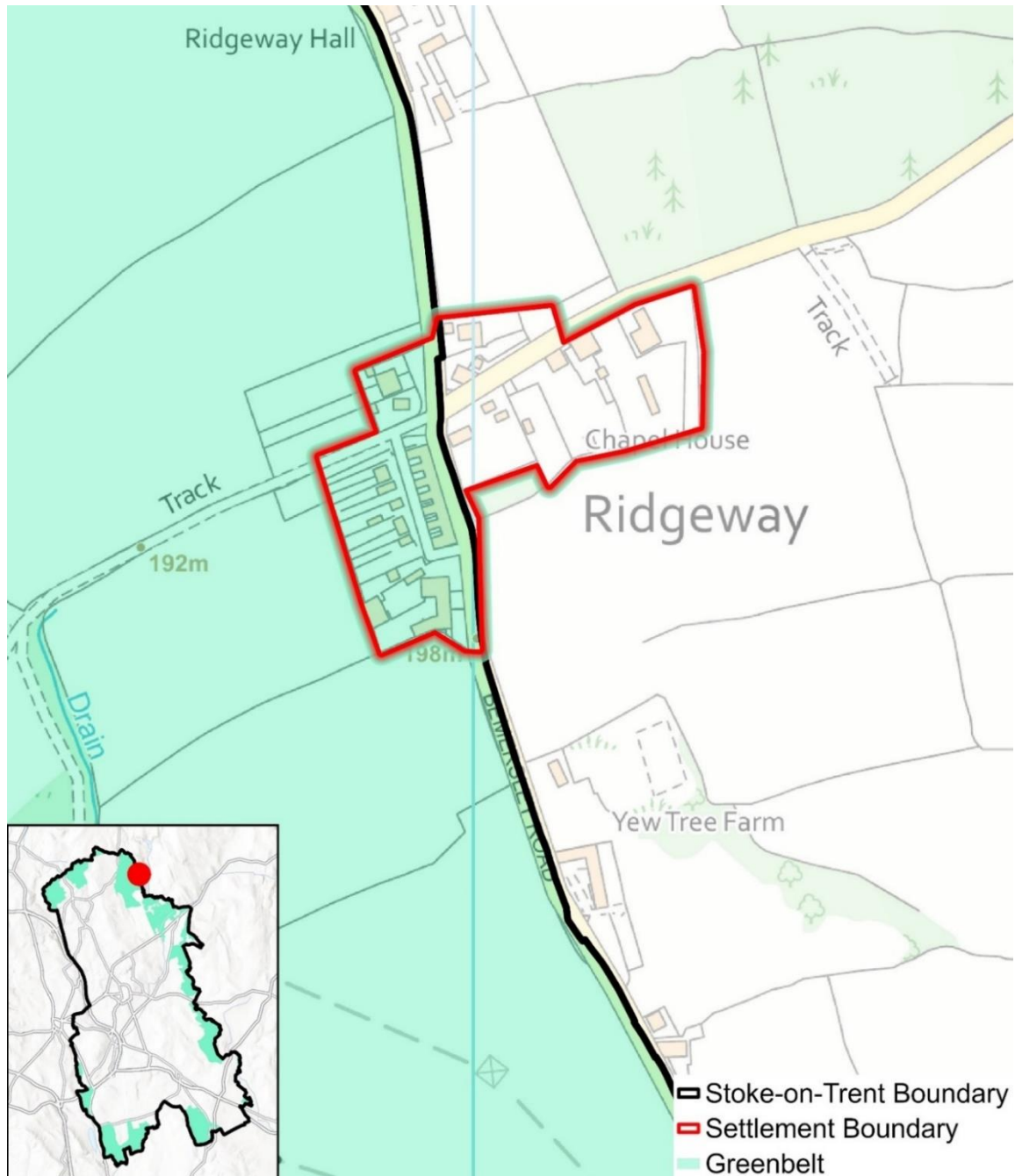
Along Bemersley Road there are approximately 31 residential properties constituting Bemersley Green however together these properties do not have a coherent spatial form as there is a group of 18 properties to the north with seven further properties grouped together approximately 1km further south along Bemersley Road. The remaining properties are sporadically located between these groupings along Bemersley Road. The properties together do not provide a defined linear settlement due to the level of separation. This will therefore not proceed to Step 2.

Figure 7. Location 2: Bemersley Green



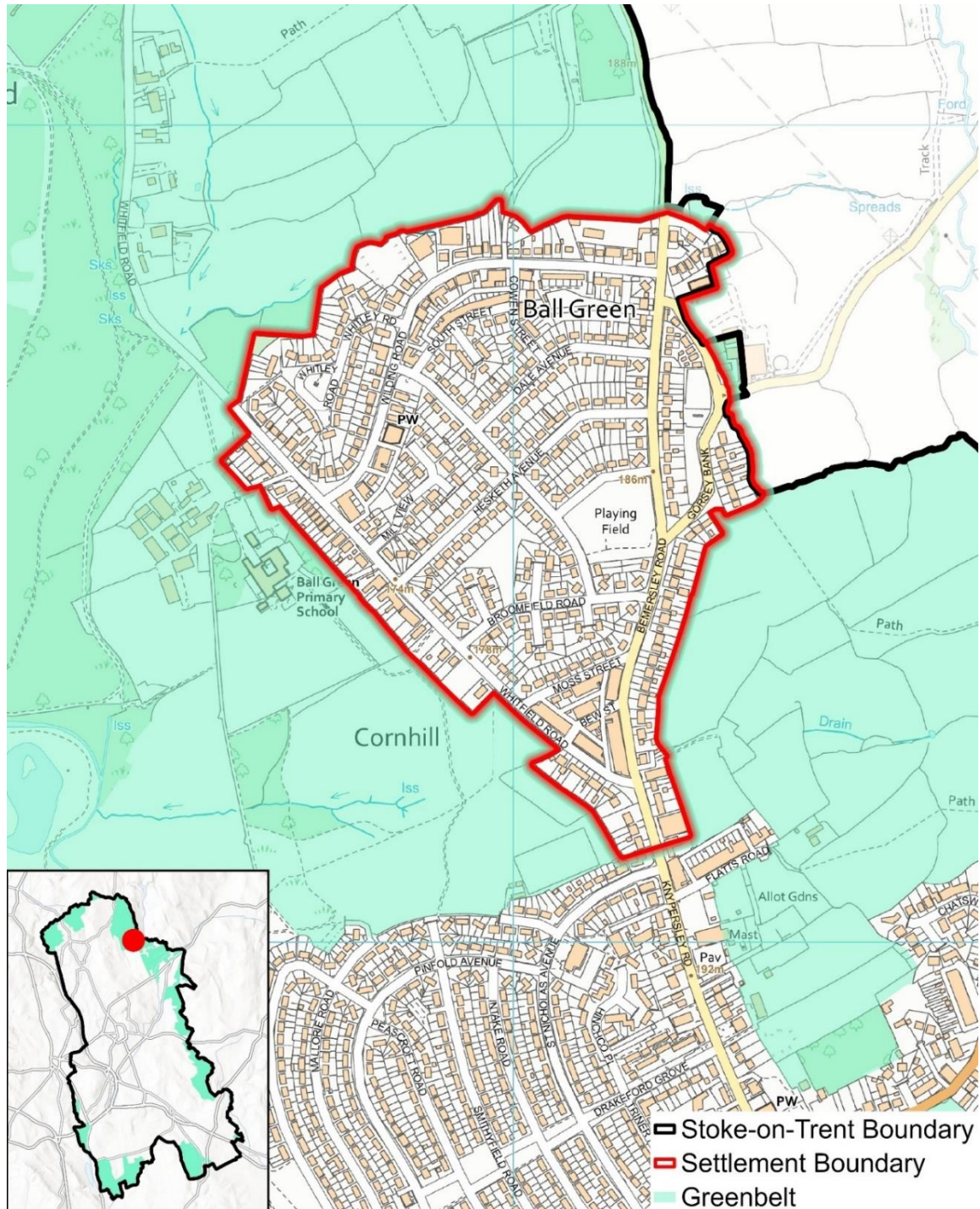
The other cluster in this location is at Ridgeway (at the junction of Bemersley Road and Tongue Lane). This is located on the edge of the Stoke-on-Trent authority boundary with Staffordshire Moorlands. There are approximately 26 residential properties in this location, 19 of these are located along Bemersley Road in Stoke-on-Trent with seven further properties located along Tongue Lane in Staffordshire Moorlands. The settlement has a coherent spatial form consisting of a small linear cluster focused along Bemersley Road and Tongue Lane with limited gaps between properties. In the Brown Edge (Ridgeway) appeal decision (see Section 2.3 above), the Inspector concluded that Ridgeway was a hamlet and not a village due to the lack of any shops or services. Given the appeal decision was from 2019, it is necessary for Ridgeway to proceed to Step 2 to consider whether the situation has changed and there are any services or facilities present now.

Figure 8. Location 2: Ridgeway



To the south of this area, the settlement of Ball Green is inset within the Green Belt albeit it is connected to the Stoke-on-Trent urban area along Knypersley Road. The level of connection is similar to Norton Green. This settlement consists of approximately 869 residential properties. It has a clearly defined coherent spatial form consisting of a critical mass of development forming a single large cluster. This cluster has multiple rows of residential properties of a similar density with limited gaps between properties and a consistent building line. This settlement will therefore proceed to Step 2.

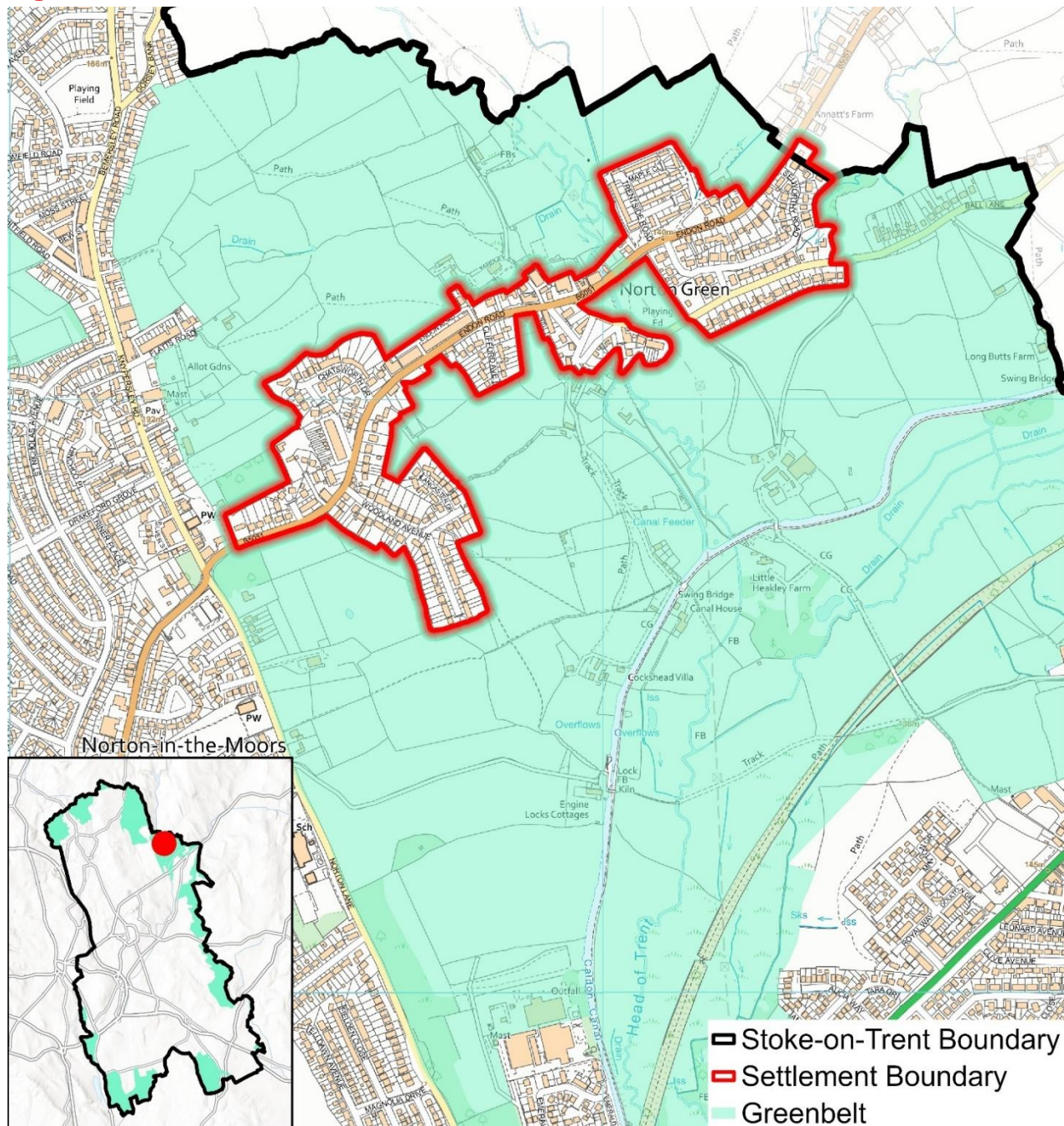
Figure 9. Location 2: Ball Green



Location 3

To the north east of the Stoke-on-Trent urban area is Norton Green. Norton Green is an inset settlement which consists of approximately 545 residential properties. It is connected to the Stoke-on-Trent urban area via Endon Road. It has a coherent spatial form consisting of two main clusters of development connected via further linear development along Endon Road. There is a clearly defined building line with limited gaps between the properties although there is a small gap between the properties near to where the River Trent passes under Endon Road.

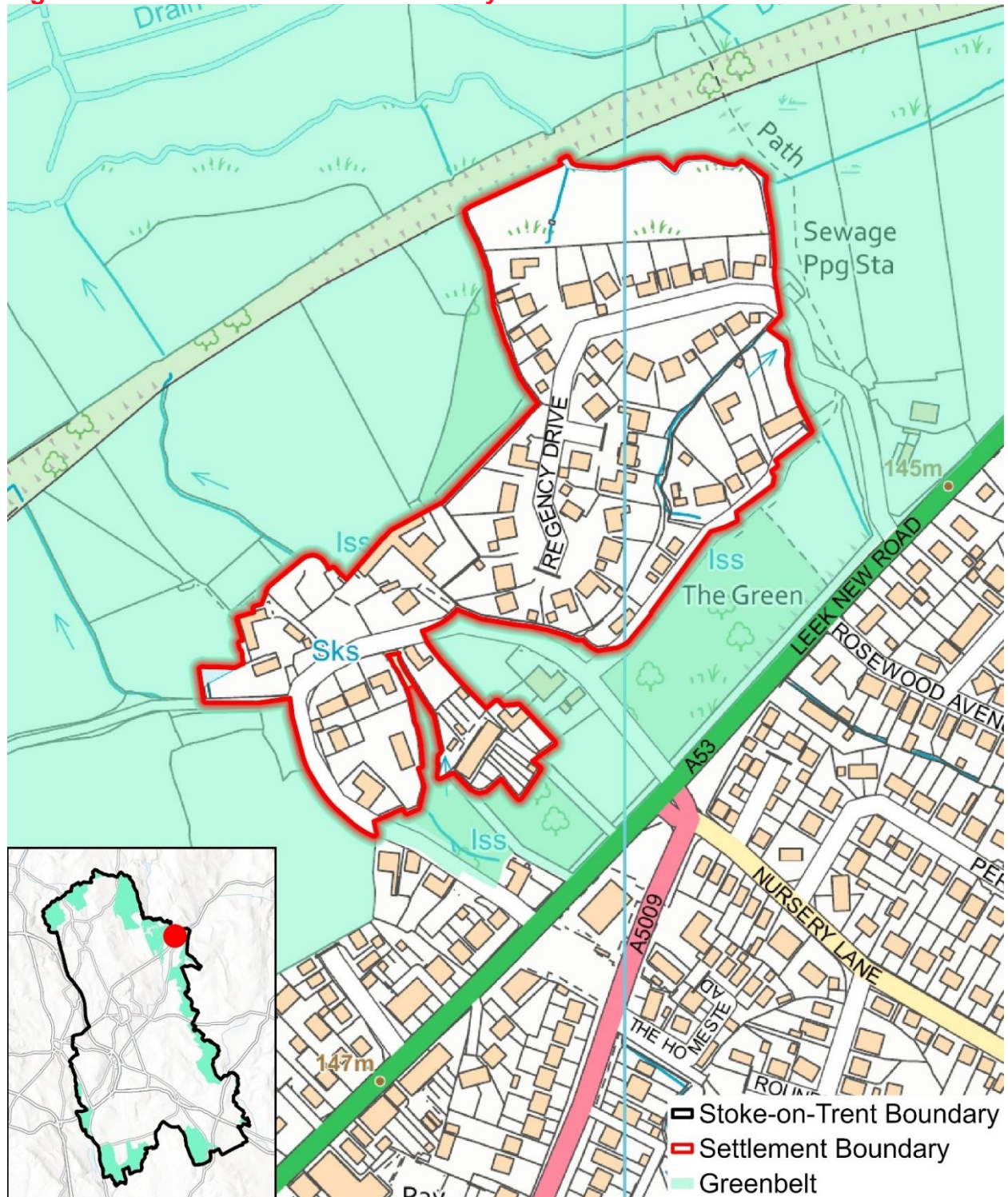
Figure 10. Location 3: Norton Green



The other cluster of residential properties in this location consists of the properties along The Green and Regency Drive located to the north of Baddeley Green. This consists of approximately 56

residential properties which are clustered together with a coherent spatial form and limited gaps between buildings. There is a small slither of Green Belt along The Green which separates this cluster of properties from Baddeley Green although it arguably functions as part of the settlement regardless. In order to ensure a consistent approach to the assessment, it is necessary to progress this cluster to Step 2.

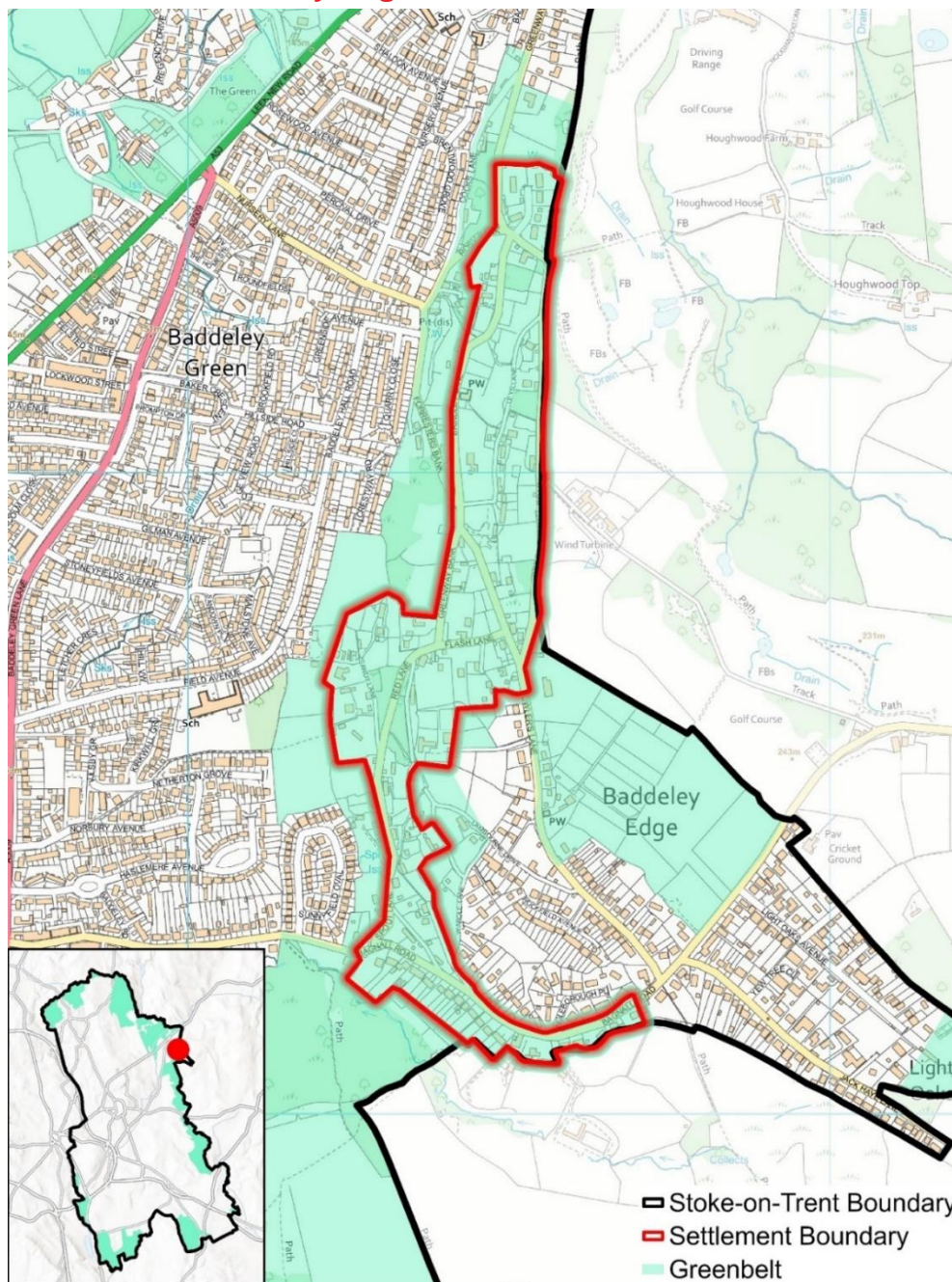
Figure 11. Location 3: North of Baddeley Green



Location 4

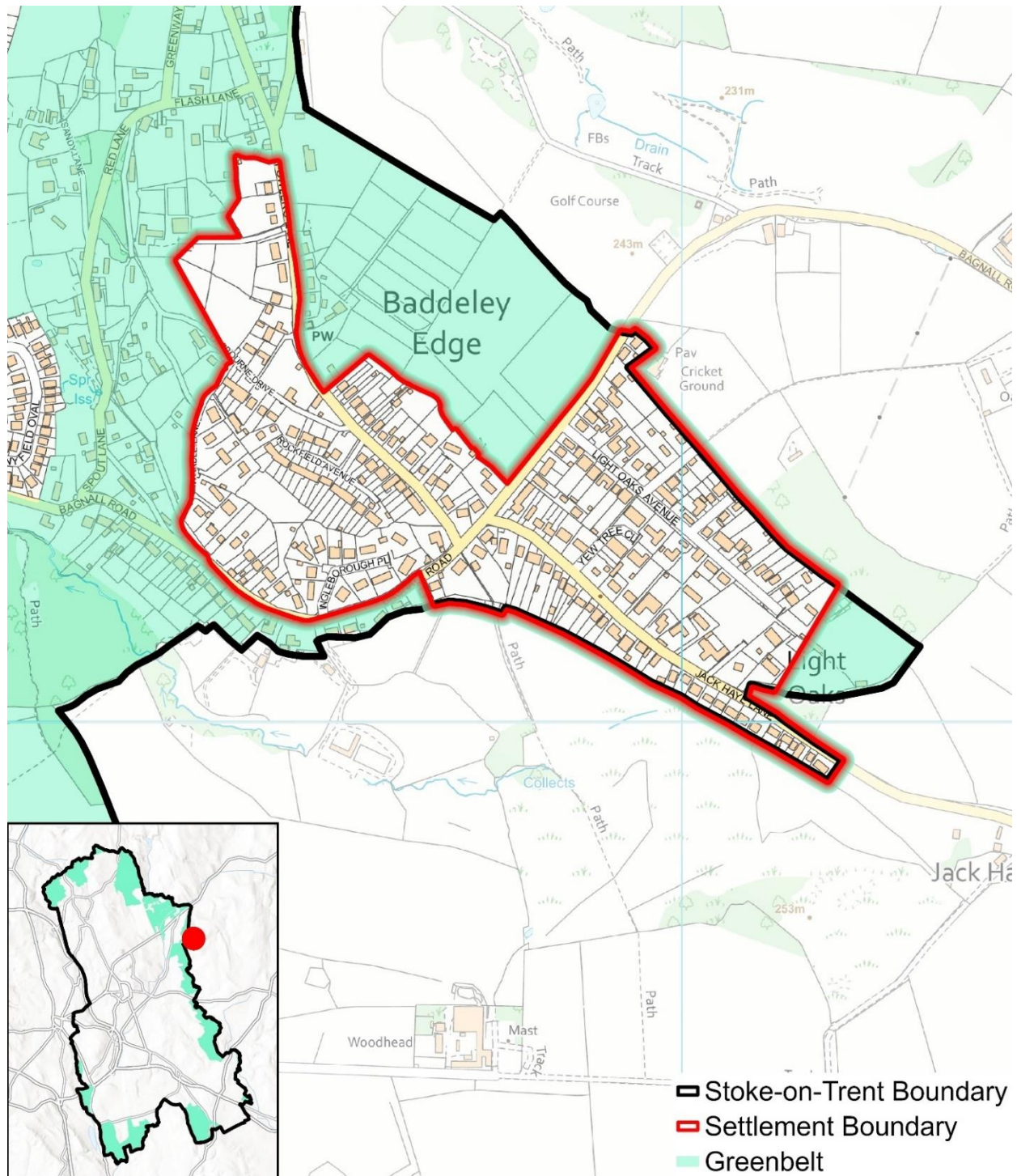
Baddeley Edge consists of approximately 144 residential properties located to the east of Baddeley Green which are washed over by the Green Belt. The properties do not have a coherent spatial form as they are sporadically spread along a number of roads, from north to south these include: Glastonbury Close, Brindley Lane, Ley's Lane, Forrester's Bank, Greenway Bank, Red Lane, Sandy Lane, Flash Lane, Spout Lane and Bagnall Road. The properties are predominantly low density consisting of large houses with large gardens and as such there is open space between the properties. With the exception of the properties along Bagnall Road, there are many gaps between properties and building lines are not clearly defined and consistent in order to form a linear cluster in any location. There is no clear central point to the collection of properties. Given the lack of a coherent spatial form, Baddeley Edge will not progress to Step 2.

Figure 12. Location 4: Baddeley Edge



Light Oaks is located to the east of Baddeley Edge and consists of a cluster of 242 residential properties which are inset within the Green Belt. The properties have a coherent spatial form and are of a higher density to the properties in Baddeley Edge. The properties form a critical mass of residential development focused around two clusters on either side of Bagnall Road. The clusters have multiple rows of properties of similar density, with limited gaps between properties and a consistent building line. This settlement will therefore proceed to Step 2.

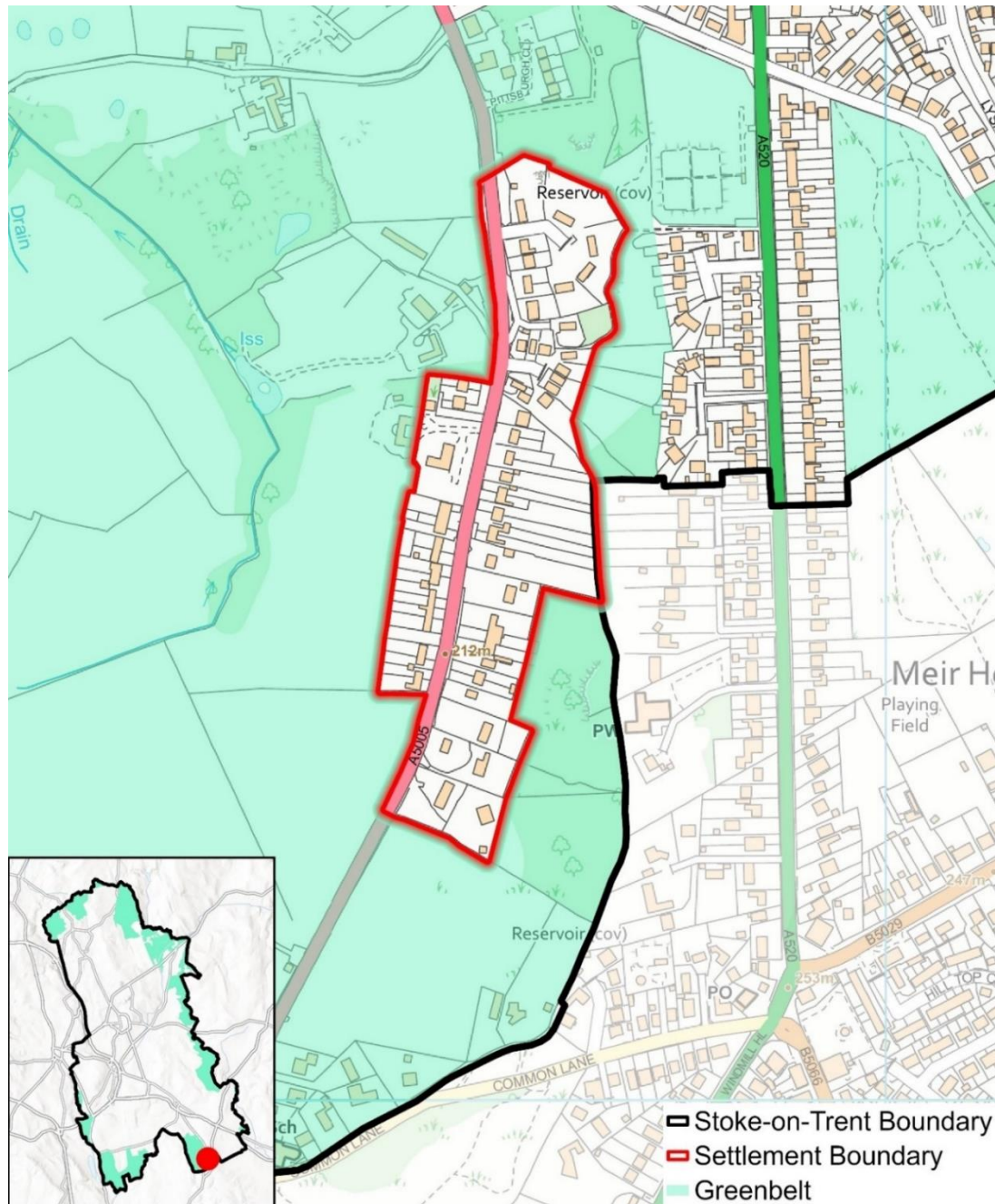
Figure 13. Location 4: Light Oaks



Location 5

To the south east of the Stoke-on-Trent urban area, there is a cluster of approximately 70 residential properties along Lightwood Road which is inset within the Green Belt. Spatially, this joins the inset settlement of Meir Heath located in neighbouring Stafford Council however it is separated from it by an area of woodland. On its own this cluster does have a coherent spatial form consisting of a small linear cluster of development focused along Lightwood Road including Roseacre Grove and Cherrywood Grove. There are limited gaps in frontages and the cluster has a clearly defined building line. There are a few properties set back from Lightwood Road to the north of the cluster however these are washed over by the Green Belt and have not been considered. This cluster of properties will therefore proceed to Step 2.

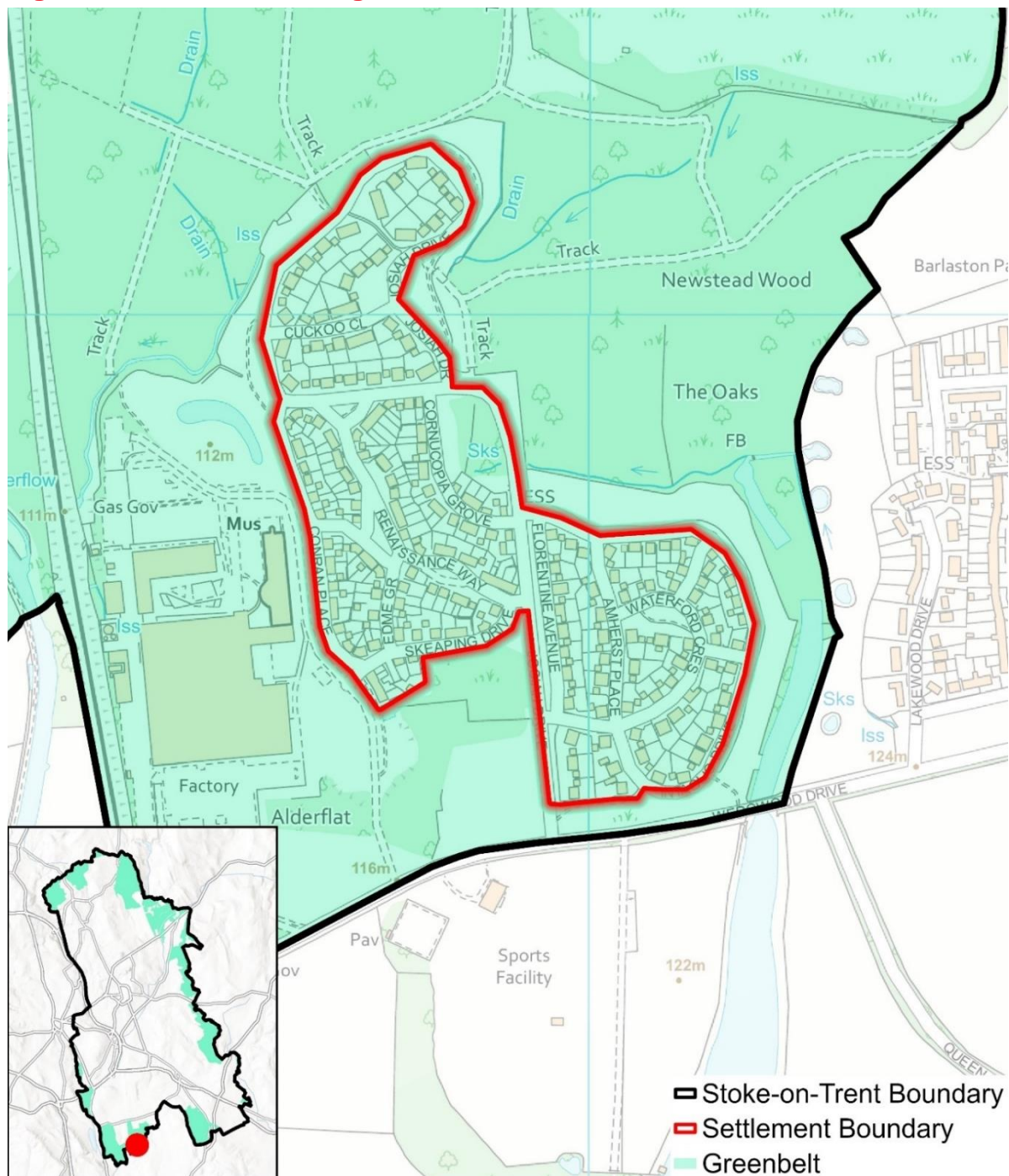
Figure 14. Location 5: Lightwood Road



Location 6

To the south of the Stoke-on-Trent urban area, Wedgewood Park consists of approximately 209 residential properties washed over by the Green Belt adjacent to the World of Wedgewood. This critical mass of residential development has a coherent spatial form consisting of two large clusters of properties on either side of Josiah Drive. The clusters consist of multiple rows of residential properties of a similar density with limited gaps between properties and a clearly defined building line. There are no properties which are set back or separate from the main clusters of development. Wedgewood Park will therefore proceed to Step 2.

Figure 15. Location 6: Wedgewood Park



Summary

The following settlements will proceed to Step 2:

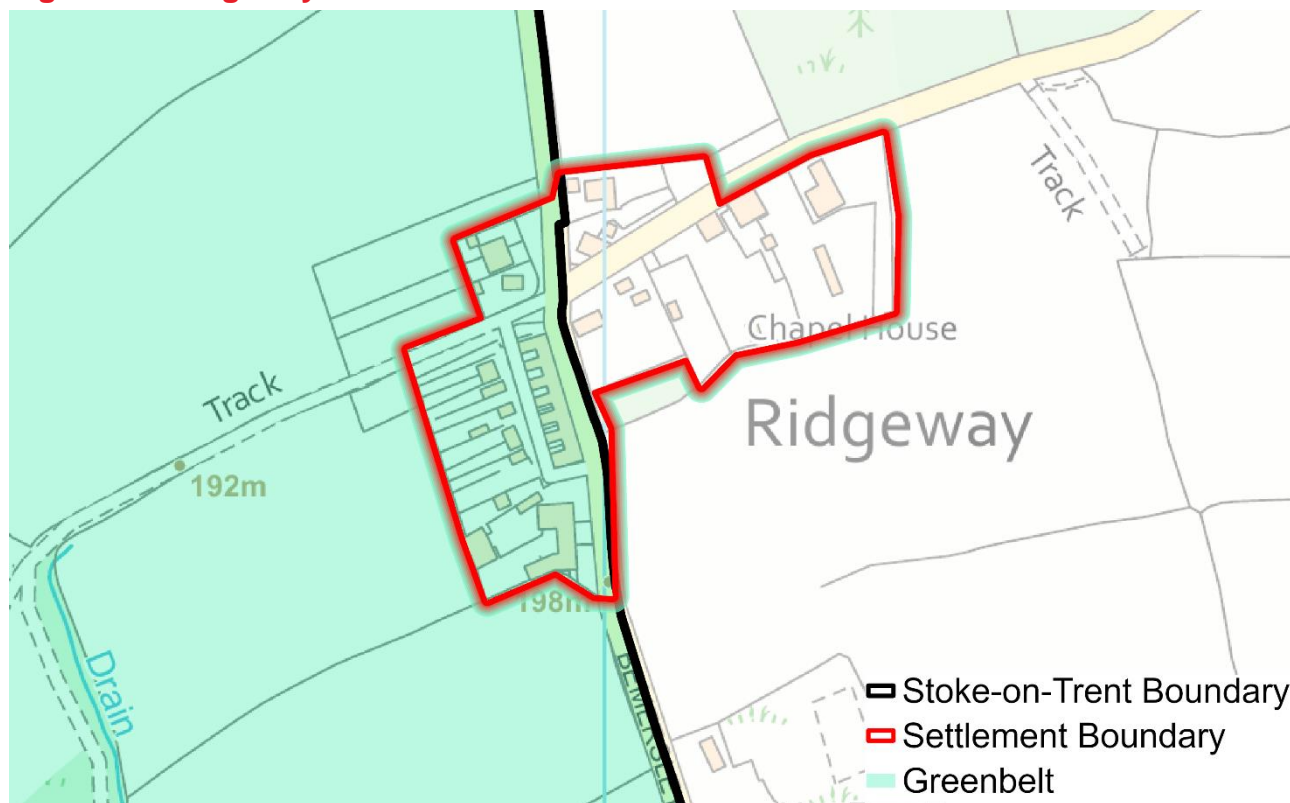
- Ridgeway
- Ball Green
- Norton Green
- Light Oaks
- Properties to the north of Baddeley Green (along The Green and Regency Drive)
- Properties to the north west of Meir Heath (along Lightwood Road)
- Wedgewood Park

6.6.2 Step 2: Settlement audit

The boundaries identified in Step 1 have been used to undertake the settlement audit for Step 2. The findings of the settlement audit and the determination as to whether the settlement is a village is set out below.

Ridgeway

Figure 16. Ridgeway



Step 2A: What is the level of service/facility provision?

Ridgeway remains unchanged since the appeal decision in 2019 and there are still no services or facilities present.

Step 2B: Is there any public transport availability?

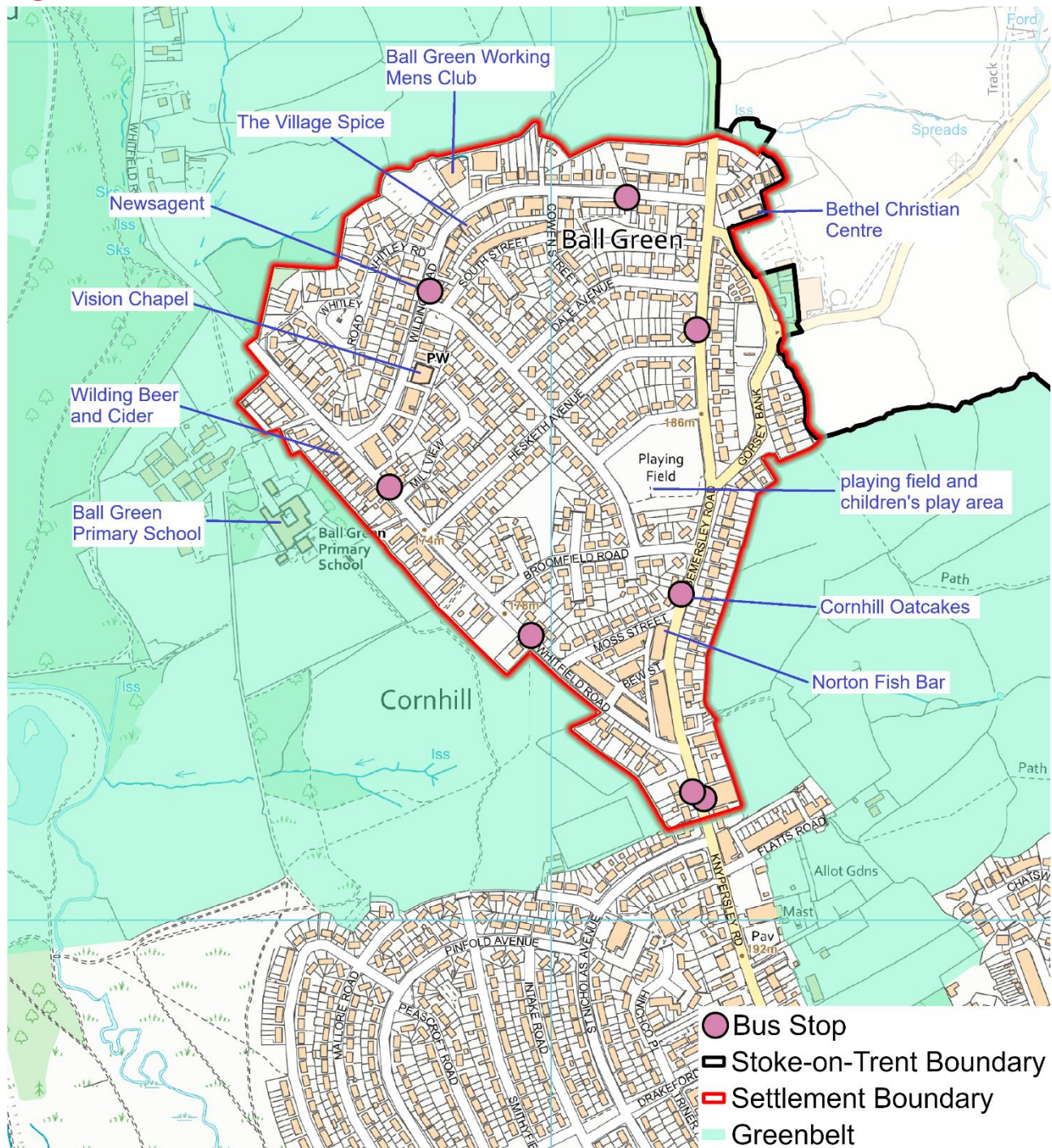
There is no public transport availability in Ridgeway. The nearest bus stop to Ridgeway is in Ball Green to the south.

Step 2C: Determining whether the settlement is a village

Ridgeway does not meet Step 2A and 2B and it is not considered a village.

Ball Green

Figure 17. Ball Green



Step 2A: What is the level of service/facility provision?

Ball Green has a range of services and facilities throughout the settlement. There is a primary school (Ball Green Primary School) located on Whitfield Road which although is a key community facility, it is located within the Green Belt and not within the defined boundary for the assessment. Along Wilding Road, there is a newsagent, an Indian takeaway (The Village Spice), a church (Vision Chapel), and a social club (Ball Green Working Mens Club). Along Bemersley Road there is a church (Bethel Christian Centre). Further south along Bemersley Road is a fish and chip shop (Norton Fish Bar) and a bakery (Cornhill Oatcakes). On Williamson Avenue, there is a playing field with a children's play area. All of these services and facilities are considered to be relevant to the community taking into account case law and the approaches adopted by other local authorities. In total, there are eight services and facilities within Ball Green. This does not include the primary school given this is within the Green Belt although it is arguably part of the settlement and is a key facility.

Step 2B: Is there any public transport availability?

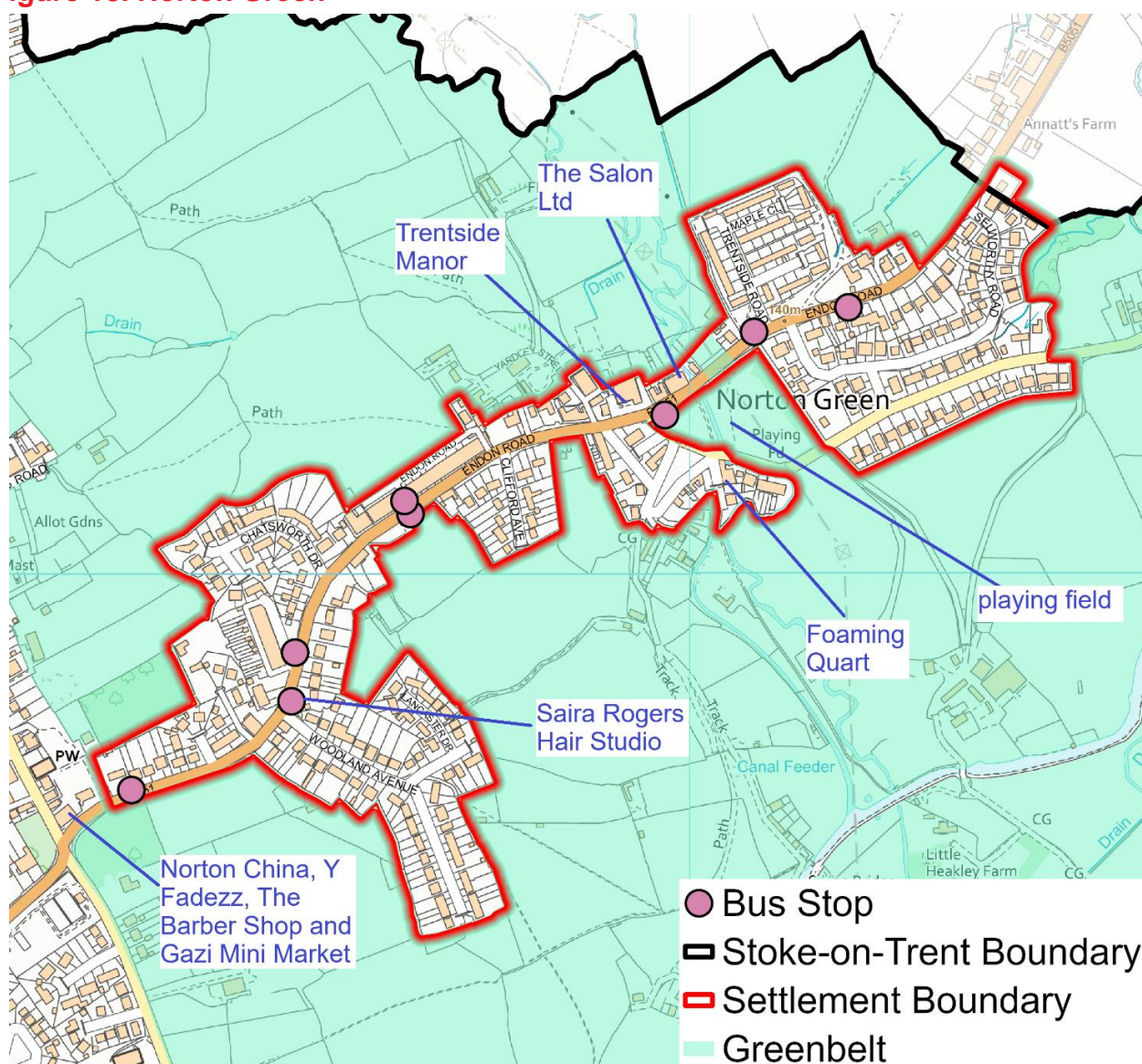
Ball Green does not have a railway station however there are a number of bus stops throughout the settlement, including on Wilding Road, Wilding Road shops, Hesketh Avenue, Mill View, Broomfield Road, Moss Street, and St Nicholas Avenue.

Step 2C: Determining whether the settlement is a village

Ball Green meets Step 2A and 2B and therefore is considered a village.

Norton Green

Figure 18. Norton Green



Step 2A: What is the level of service/facility provision?

Norton Green has a few services and facilities. To the west of Endon Road is a hairdressers (Saira Rogers Hair Studio). In the middle of Norton Green along Endon Road is a care home (Trentside Manor) and another hairdresser (The Salon Ltd), whilst along Frobisher Street is a pub (Foaming Quart). Along Ball Lane there is a playing field although this is located within the Green Belt outside the defined boundary for the assessment. The hairdressers, pub and playing field are all considered to be relevant to the community taking into account case law and the approaches adopted by other local authorities. Although the Inspector in the Norton Green appeal decision noted the presence of the care home, this has not been counted as part of the assessment due to its specialist nature. It is relevant to note that to the very west of Endon Road at its junction with Knypersley Road there are a range of facilities including a takeaway (Norton China), two barber shops (Y Fadezz and The Barber Shop), and a convenience store (Gazi Mini Market). These have not been counted as they are outside of the defined boundary for the assessment and are assumed to be within Norton rather than Norton Green. In total, there are three services and facilities within

Norton Green (the two hairdressers and the pub). The playing field has not been counted as it is within the Green Belt and is outside the boundary for the assessment although it arguably functions as part of the settlement.

Step 2B: Is there any public transport availability?

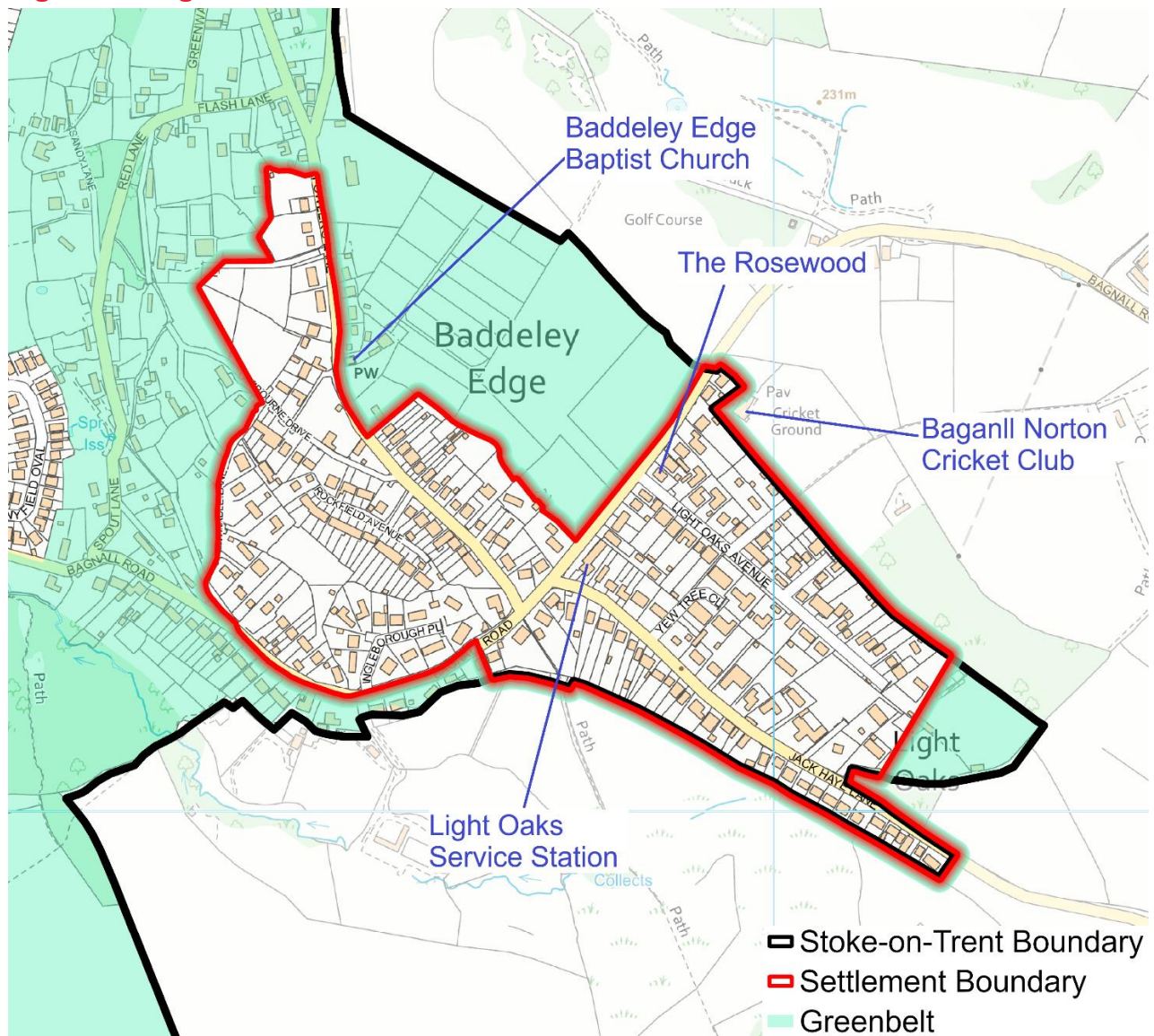
There are no railway stations near Norton Green however there are a number of bus stops in Norton Green along the full extent of Endon Road.

Step 2C: Determining whether the settlement is a village

Norton Green meets Step 2A and 2B and therefore is considered a village.

Light Oaks

Figure 19. Light Oaks



Step 2A: What is the level of service/facility provision?

There are very few services and facilities within Light Oaks. Along Bagnall Road is a car repair shop (Light Oaks Service Station) and a small care home (The Rosewood) although given their

specialist nature these do not count as part of the assessment as they are unlikely to be frequently visited or used by the vast majority of the community. Baddeley Edge Baptist Church is located along Fowler's Lane although it is located in the Green Belt and not part of the residential cluster which is inset within the Green Belt although it is arguably still a part of it and is a key community use. Bagnall Norton Cricket Club is located on the immediate periphery of the settlement on Bagnall Road. Overall, based on the boundary for the assessment there are no services and facilities within Light Oaks however there are two services and facilities (the church and cricket club) on the immediate periphery within the Green Belt.

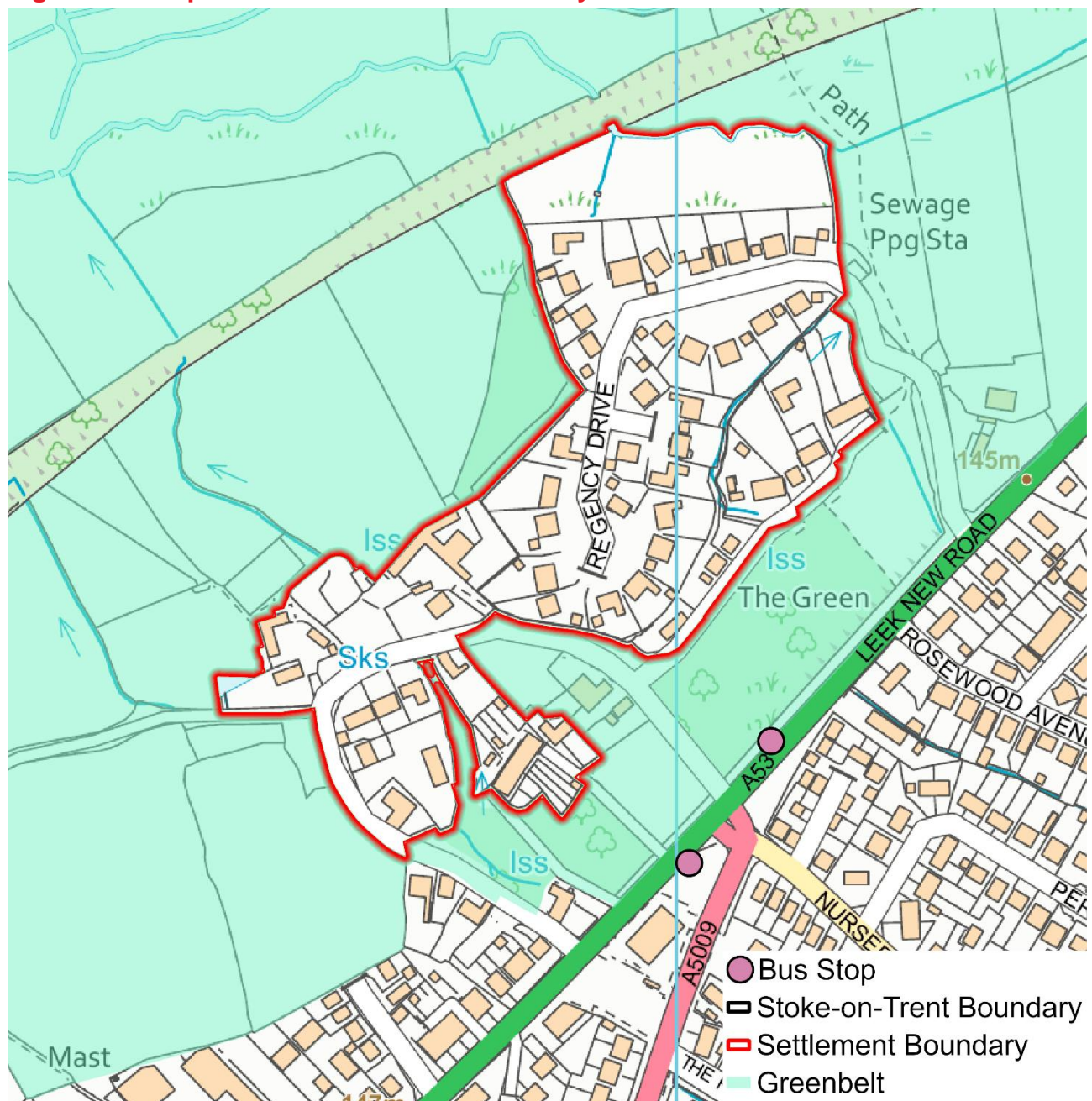
Step 2B: Is there any public transport availability?

There is no public transport availability in Light Oaks. The nearest bus stop is Crossroads bus stop located on Leek Road 697m to the west.

Step 2C: Determining whether the settlement is a village

It is arguable whether Light Oaks meets Step 2A however given that it does not meet Step 2B, it is not considered a village regardless.

Properties to the north of Baddeley Green (along The Green and Regency Drive)
Figure 20. Properties to the north of Baddeley Green



Step 2A: What is the level of service/facility provision?

There are no services or facilities within this cluster of residential properties. There are a large number of services and facilities to the south within Baddeley Green which are likely to serve these residents.

Step 2B: Is there any public transport availability?

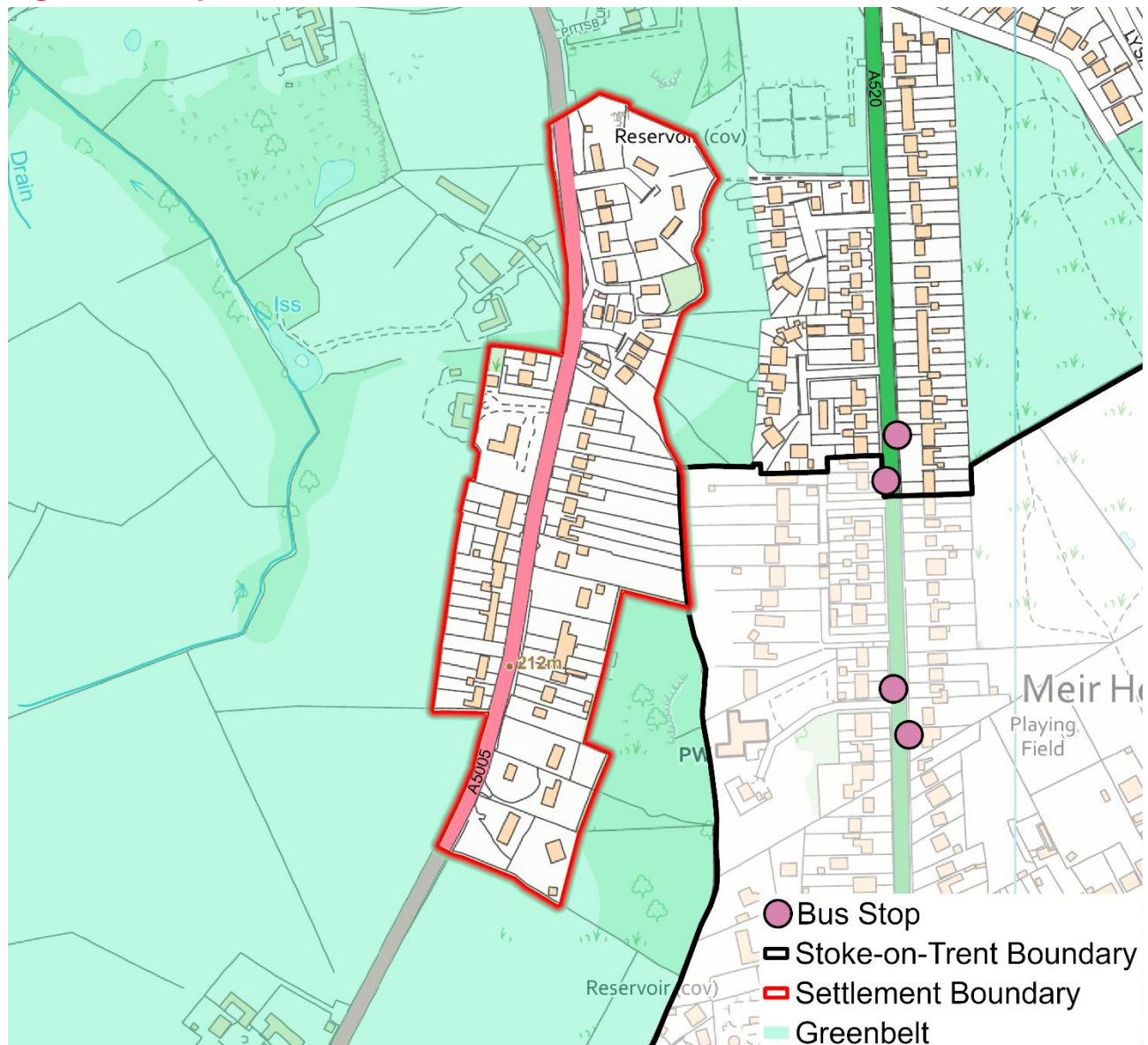
There is no public transport availability in this location. The nearest bus stop is along Leek New Road within Baddeley Green to the south.

Step 2C: Determining whether the settlement is a village

This cluster of properties does not meet Step 2A and 2B and it is not considered a village.

Properties to the north west of Meir Heath (along Lightwood Road)

Figure 21. Properties to the north west of Meir Heath



Step 2A: What is the level of service/facility provision?

There are no services or facilities within this cluster of residential properties. There are a range of services and facilities to the south east within Meir Heath which are likely to serve these residents.

Step 2B: Is there any public transport availability?

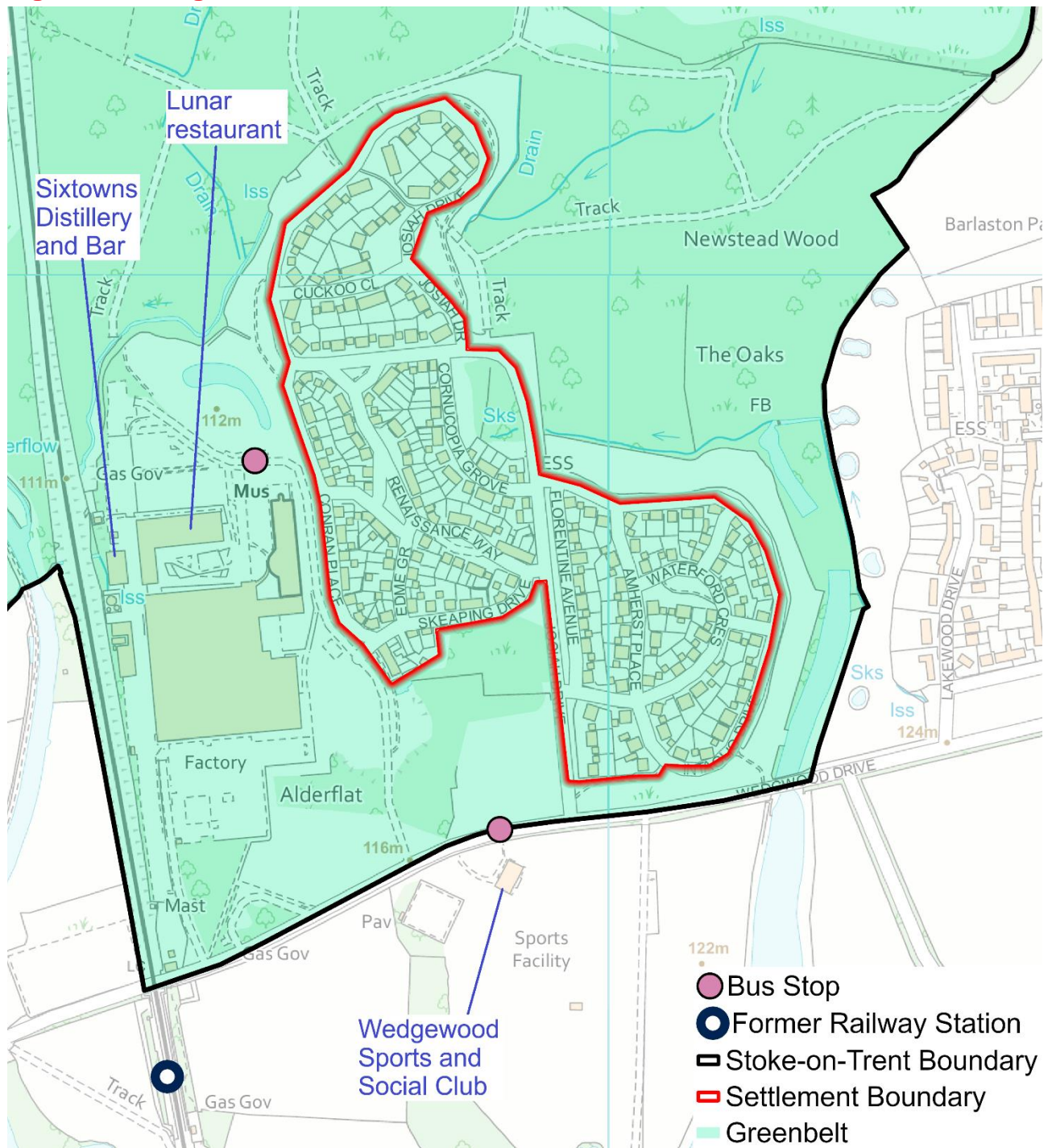
There is no public transport availability in this location. The nearest bus stop is along Sandon Road which is 150m to the east (as the crow flies).

Step 2C: Determining whether the settlement is a village

This cluster of properties does not meet Step 2A and 2B and it is not considered a village.

Wedgewood Park

Figure 22. Wedgewood Park



Step 2A: What is the level of service/facility provision?

There are no services or facilities within the residential area of Wedgewood Park however the adjacent World of Wedgewood which is a tourist attraction includes a restaurant (Lunar), a tea room (Wedgewood Tea Room) and a bar (Sixtowns Distillery and Bar). The restaurant and bar are run by partner organisations and are open outside of the World of Wedgewood opening times. These facilities are therefore accessible to the residents at Wedgewood Park and are considered to be

relevant to the community taking into account case law and the approaches adopted by other local authorities. Wedgewood Sports and Social Club is also a relevant community use and is located in close proximity to the residential areas being located to the south of Wedgewood Drive. It includes football pitches and a cricket pitch as well as a club building. Overall, based on the boundary for the assessment, there are no services or facilities within Wedgewood Park however there are three facilities (Lunar restaurant, Sixtowns bar, and Wedgewood Sports and Social Club) on the periphery of it.

Step 2B: Is there any public transport availability?

There is no public transport availability within the residential area of Wedgewood Park however World of Wedgewood bus stop is located approximately 40m to the west within World of Wedgewood. There is also a bus stop approximately 100m to the south along Wedgewood Drive. Wedgewood Station is located 323m to the south west (as the crow flies) along Wedgewood Drive however it is no longer operational.

Step 2C: Determining whether the settlement is a village

Wedgewood Park does not meet Step 2A and 2B as the services and facilities and the public transport availability are located on the periphery of it and not within the settlement. As such, it is not considered a village.

6.7 Conclusion

A summary of the assessment findings is set out in the table below. In conclusion, both Ball Green and Norton Green have been identified as villages.

Table 23. Summary of assessment findings

Settlement / cluster of properties	Step 2A – Are there two or more services or facilities?	Step 2B – Is there any public transport availability?	Step 2C – Is the settlement a village?
Ridgeway	No	No	No
Ball Green	Yes, eight services and facilities	Yes, numerous bus stops	Yes
Norton Green	Yes, three services and facilities	Yes, numerous bus stops	Yes
Light Oaks	No, not within the settlement however two services and facilities on the immediate periphery.	No	No
Properties to the north of Baddeley Green (along The Green and Regency Drive)	No	No	No

Settlement / cluster of properties	Step 2A – Are there two or more services or facilities?	Step 2B – Is there any public transport availability?	Step 2C – Is the settlement a village?
Properties to the north west of Meir Heath (along Lightwood Road)	No	No	No
Wedgewood Park	No, not within the settlement however three services and facilities on the periphery.	No, not within the settlement however two bus stops on the periphery.	No

Appendix A

Review of Comparative Examples of Green Belt Assessments

Local Authority	Summary of Approach	Local Plan Inspector Comments
<p>Greater Manchester Combined Authority Places for Everyone Plan (adopted 21 March 2024)</p> <p>Stage 1¹⁸ and Stage 2¹⁹ Green Belt Studies (2016 to 2021) (LUC)</p>	<p>General approach and scope</p> <p>The Stage 1 Green Belt Assessment divided the entire Greater Manchester Green Belt into parcels. Two types of parcels were identified: Areas adjacent to built up area and broad areas of Green Belt more remote form. No standard maximum and minimum sizes for the land parcels were set – they were defined according to recognisable boundaries. In addition, a number of Strategic Green Belt Areas were defined and assessed in order to recognise the importance of adequately capturing the strategic as well as the parcel specific role of areas of Green Belt in meeting the purposes defined in NPPF. All parcels were then assessed against the five Green Belt purposes on a desktop basis combined with a field survey of each site.</p> <p>Approach to defining parcels</p> <p>Parcels were defined using the following features:</p> <ul style="list-style-type: none"> Natural features; for example, substantial watercourses and water bodies. 	<p>The Places for Everyone Inspector’s Report²⁰ at paragraphs 202-204 comments on the Green Belt evidence. The Inspector states:</p> <p><i>“202. The role that each allocation serves in checking the unrestricted sprawl of large built-up areas, safeguarding the countryside from encroachment, preventing neighbouring towns merging into one another and preserving the setting and special character of historic towns, along with the impact that the proposed development would have on those Green Belt purposes, was assessed during the preparation of the Plan in a consistent and systematic manner [through the Stage 1 and 2 Green Belt Studies 2016 to 2021].</i></p> <p><i>203. The potential impact of removing any particular site from the Green Belt on urban regeneration is difficult to assess. Various policies</i></p>

¹⁸ [Stage 1 Green Belt Assessment document link](#)

¹⁹ The Stage 2 study involved a suite of assessments including: Assessment of Proposed 2019 GMSF Allocations (2020), Addendum: Assessment of Proposed 2020 GMSF Allocations (2020), Contribution Assessment of Proposed 2020 GMSF Green Belt Additions (2020), Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions (2020), Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in the vicinity of Proposed 2019 Allocations (2020) and PfE Addendums to the Stage 2 Greater Manchester Green Belt Study (2021) – as described in the Green Belt Topic Paper ([Green Belt Topic Paper document link](#))

²⁰ [Places for Everyone Inspector’s Report document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<ul style="list-style-type: none"> Man-made features; for example, motorways, A and B roads and railway lines. <p>Where no other suitable boundary exists, less prominent features were used to define the parcel boundaries. This includes walls, woodland, hedgerows, tree lines, streams and ditches.</p> <p>Approach to assessing the five Green Belt purposes</p> <p><u>Rating</u></p> <p>The parcels were rated strong, moderate, weak, no contribution or not applicable. The Strategic Green Belt Area had slightly different rating of strong, moderate-strong, moderate, weak-moderate, weak, and no contribution.</p> <p><u>Purpose A</u></p> <p>The ‘large built-up area’ is defined for the purposes of the study taking into account the original purpose of the Manchester Green Belt. The study notes there is a visible continuous urban mass that stretches across all of the ten local authorities and therefore all settlements within this main urban area should be included.</p> <p>Criterion 1a considers whether land has already been affected by sprawl and whether it retains an open character.</p> <p>Criterion 1b considers the role of boundary features, the nature of the settlement form (i.e. potential for rounding off), the presence of roads (i.e. potential for ribbon development), and potential for sprawl to occur beyond the parcel boundary (i.e. due to boundaries or enclosure) in affecting the</p>	<p><i>in the Plan aim to make as much use as possible of previously developed land, and this will be taken forward through individual local plans and planning decisions. Part of the justification for removing many of the allocations from the Green Belt is that, because of their location and/or scale, they provide opportunities for different types of development to that which could be attracted to urban brownfield sites. Overall, we are satisfied that the development proposed on the 38 allocations in the Plan would not have any significant impact on urban regeneration, and that the assessment of the impact on Green Belt purposes represents adequate and proportionate evidence.</i></p> <p><i>204. That evidence indicates that development on each allocation would cause harm to one or more Green Belt purpose, and that the overall harm in each case would vary from low to very high. Whilst the assessments are judgement-based, we are satisfied that the approach taken was informed and consistent. Unless otherwise specified below in relation to a particular site, we agree with the level of harm to Green Belt purposes identified.”</i></p>

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>potential for urban sprawl to occur in the absence of the Green Belt designation.</p> <p><u>Purpose B</u></p> <p>The study defines ‘neighbouring towns’ as all inset settlements in Greater Manchester and identifies a number of settlement outside of Greater Manchester.</p> <p>The assessment does not provide a distance measurement and instead considers the physical and visual role of the parcel in preventing the merging of settlements (including consideration of perceptual issues).</p> <p><u>Purpose C</u></p> <p>The criteria considers whether the parcel has the characteristics of countryside and/or connects to land with the characteristics of countryside. It also considers whether the parcel has been affected by encroachment.</p> <p><u>Purpose D</u></p> <p>The study defines ‘historic town’ by reference to the Greater Manchester Historic Landscape Characterisation combined with analysis of Conservation Areas. For those settlements outside of Greater Manchester, the presence of a Conservation Area was used as the determining factor. In assessing the historic towns, a theoretical analysis based on standard building height and bare ground topography using a digital ground model was undertaken. This was then confirmed through a field survey.</p> <p><u>Purpose E</u></p> <p>The study notes that Purpose E is important and should be afforded equal weight with Purpose A-D however states it is not possible to assess the</p>	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>performance of Purpose E on a parcel by parcel basis. No assessment of Purpose E was undertaken.</p> <p><u>Overall assessment</u></p> <p>The study presents the findings based on each purpose. No aggregation of ratings is undertaken.</p> <p>Consideration of Green Belt harm</p> <p>The Stage 2 study provided an assessment of harm based on the proposed site allocations. It considers the extent to which the release of land within each proposed site allocation would reduce the contribution to Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the adjacent Green Belt, bearing in mind factors such as the extent to which adjacent retained Green Belt would become contained by new development and the impact on the strength of remaining Green Belt boundaries. The assessment involved five key steps:</p> <p>Step 1 – Consideration of the relevance of each Green Belt purpose to the area;</p> <p>Step 2 – Analysis of how the allocated site relates to the urban edge and/or wider countryside;</p> <p>Step 3 – Assessment of the contribution of land within the allocation to the Green Belt purposes;</p> <p>Step 4 – Assessment of the impact of release from the Green Belt on adjacent retained Green Belt land</p>	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>Step 5 – Identification of variations in harm to the Green Belt within the Allocation i.e. as sub areas where relevant, marking out areas more or less suitable for development with a view to potential for minimising harm.</p> <p>Each allocation and sub-area received a ‘harm’ rating of Very High, High, Moderate-High, Moderate, Low-Moderate, Low or Very Low. The assessment does not draw conclusions on what land should be released to accommodate development but identified variations in harm to the designation.</p>	
<p>Warrington Local Plan (adopted 4 December 2023)</p> <p>Green Belt Assessment (2016)²¹ and Implications of Green Belt Release Report (2021)²² (Arup)</p>	<p>General approach and scope</p> <p>The Green Belt Assessment undertook a two stage approach dividing the entire Warrington Green Belt into general areas and assessing these against the five purposes. Following on from this, one width of parcels were defined around the Warrington urban area, all inset settlements, and settlements in neighbouring authorities which abutted the Green Belt boundary. These parcels were assessed against the five Green Belt purposes. The general area assessment was undertaken on a desktop basis only. The parcel assessment involved a combination of desktop assessment and a site visit of each parcel.</p> <p>Approach to defining parcels</p>	<p>The Local Plan Inspector’s Report²⁴ focuses on the strategic and site level exceptional circumstances case and the outcomes of the Green Belt site assessments however it does not comment on the approach or the methodology.</p>

²¹ [Green Belt Assessment \(2016\) document link](#)

²² [Implications of Green Belt Release Report document link](#)

²⁴ [Warrington Local Plan Inspector’s Report document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>General area were defined using the strongest boundaries consisting of motorways, A roads, main waterways, and railway lines. As this resulted in a number of disproportionately small general areas, some of these were merged. A threshold of 150ha was used as this was considered to maintain a strategic emphasis.</p> <p>In defining parcels, ‘durable features’ were used in the first instance, following by ‘features lacking durability’. Table 3 of the report sets out how these features are defined.</p> <p>Approach to assessing the five Green Belt purposes</p> <p><u>Rating</u></p> <p>A qualitative scoring system was applied to each purpose and overall consisting of strong, moderate, weak and no contribution.</p> <p><u>Purpose A</u></p> <p>The ‘large built-up area’ was defined for the purposes of the assessment as the Warrington urban area.</p> <p>The assessment included four criteria:</p> <ul style="list-style-type: none"> • Whether the parcel was adjacent to the large built up area. Parcels which were not adjacent were assessed as no contribution. • Whether there was an existing durable boundary between the parcel and the built up area which could prevent sprawl. • The connection to the built up area (i.e. the potential for rounding off). • Whether the parcel plays a role in preventing ribbon development. 	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p><u>Purpose B</u></p> <p>‘Neighbouring towns’ were defined as the Warrington urban area and the inset settlements of Culcheth and Lymm, as well as a number of settlement in neighbouring authorities. Not all inset settlements were considered relevant for Purpose B and only those settlements defined as neighbourhood centres in the Warrington Retail Centres Report and the Local Plan Core Strategy were deemed relevant as these had the highest level of population outside of the main urban area.</p> <p>The assessment considered whether a reduction in the gap between the neighbouring towns would compromise the openness of the Green Belt and lead to the actual or perceived merging of the towns. This was on a case by case basis and not set by distance measurements. The following terminology was used to define the gap: essential gap, largely essential gap, and less essential gap.</p> <p><u>Purpose C</u></p> <p>The assessment used the following criteria:</p> <ul style="list-style-type: none"> • Whether there were existing durable boundaries which would contain any future development and prevent encroachment in the long term (taking into account both the boundary between the parcel and the settlement, and the boundary between the parcel and the countryside). • Whether there was existing encroachment (i.e. the existing land use). • The degree of connection to the countryside and the degree of openness (taking into account built form, the presence of views, and vegetation). 	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<ul style="list-style-type: none"> • Whether the parcel serves a beneficial use of the Green Belt. <p><u>Purpose D</u></p> <p>The assessment defines ‘historic town’ based on the Cheshire Historic Landscape Characterisation (2007) and the Cheshire Historic Towns Survey (2003). Lymm and Warrington are defined as historic towns, in addition to the neighbouring authorities of Widnes and Runcorn. In reviewing the relevant Conservation Area appraisals, a number of important viewpoints were identified and mapped and are considered as part of the assessment.</p> <p>The assessment uses the following criteria:</p> <ul style="list-style-type: none"> • Is the parcel adjacent to a ‘historic town’ and/or crosses an important viewpoint of the spire of the Parish Church of St Elphins? • Assess the proximity of the town’s relevant Conservation Areas to the Green Belt (a 250m was applied to undertake this in order to bring the relationship between the Conservation Area and the Green Belt into focus). • Is there modern built development which reduces the role of the Green Belt in preserving the setting and special character? • Are there any other designated heritage assets within the 250m buffer which add to the setting and special character and / or does the parcel crosses an important viewpoint of the spire of the Parish Church of St Elphins? <p><u>Purpose E</u></p>	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>All Green Belt was assessed as ‘moderate contribution’ for this purpose. The assessment notes that the alternative approach of assessing the urban potential by individual settlement within the authority would result in a skewed assessment given the size of the inset settlements.</p> <p><u>Overall assessment</u></p> <p>The document provides guidance on how to assess the overall contribution. Where there is a clear majority contribution, this is applied in most cases. In other cases, professional judgement is applied taking into account the overall aim and purpose of the Green Belt.</p> <p>Consideration of Green Belt harm</p> <p>The 2016 assessment did not consider the potential harm to the Green Belt of releasing certain parcels as this was not within the scope. Further in the plan-making process, an assessment of the implications for the Green Belt resulting from the proposed allocations was undertaken which considered the site’s existing contribution to Green Belt purposes, the impact of removing the site on Green Belt purposes, any cumulative impacts, and the resultant Green Belt boundary. A conclusion on the Green Belt impact was made (Implications of Green Belt Release report (August 2021)²³).</p>	
<p>Calderdale Council Local Plan (adopted 22 March 2023)</p>	<p>General approach and scope</p> <p>The method consists of three distinct stages: initial sieving, parcel identification, and parcel testing. The initial sieving process considered the whole of the Calderdale Green Belt and the area around Todmorden (although this is not in the Green Belt) and removed areas protected by</p>	<p>During the Examination hearing sessions, the Local Plan Inspector sought justification from the Council on the local interpretation of Purpose D in the Green Belt Review and Green Belt Assessment of Site Options.</p>

²³ [Implications of Green Belt Release Report document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
Green Belt Review (2017) (Calderdale Council) ²⁵	<p>national and international designations (SPA and SAC) and areas which scored below 6 in the Council's Settlement Hierarchy model. Areas scoring less than 6 were deemed to have a low sustainability score and therefore contradicted the NPPF paragraph 84 which required Green Belt boundaries to take into account the need to promote sustainable patterns of development. Following the sifting process, parcels were then defined and assessed against the five NPPF purposes. Council officers undertook the assessment through a desktop basis as well as site visits.</p> <p>Approach to defining parcels</p> <p>Parcels were defined using the following criteria:</p> <ul style="list-style-type: none"> • Parcels should not cross significant boundaries such as motorways, rivers or protected woodlands. Each parcel should be clearly defined by durable, significant and strong physical boundaries wherever possible; • Parcels should take account of changing landscape and landform and should therefore be of similar character and land-use; • The land within each parcel should have a similar impact on the openness of the Green Belt; and • Parcels should be smaller in area where they are located close to existing boundaries. 	<p>Following discussions at the Matter 12 hearing, the Inspector requested that the Council undertake sensitivity testing on Purpose D for the Green Belt Review and the Green Belt Assessment of site options by omitting Purpose D in order to show if its omission changes the overall results/conclusions. The Council produced a document: 'Green Belt Review and Green Belt Site Assessment Sensitivity Testing Paper' (December 2020).²⁶ This concluded that the omission of Purpose D from the Green Belt Review and the Green Belt assessment of site options would not impact on the allocations for development put forward by the Council. Whilst a small number of filtered sites would be affected by a sensitivity change in Green Belt status from most sensitive to medium sensitive, this change would not affect the Council's decision to filter those sites with other factors determining this decision. Whilst one allocated site would experience a change in sensitivity due to the omission of Purpose D, this change would be from</p>

²⁵ [Green Belt Review \(2017\) document link](#)

²⁶ [Green Belt Review and Green Belt Site Assessment Sensitivity Testing Paper document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>Approach to assessing the five Green Belt purposes</p> <p><u>Rating</u></p> <p>The criteria against each purpose were assessed on a ‘yes/no/partial’ basis resulting in an overall purpose rating of ‘yes/no’.</p> <p><u>Purpose A</u></p> <p>The method defines ‘large built-up area’ as including the seven main towns (Halifax, Brighouse, Elland, Sowerby Bridge, Mytholmroyd, Hebden Bridge and Todmorden) and the smaller settlements some of which are continuous to the built-up area (these including Ripponden and Rishworth, and Luddenden and Luddenden Foot). The method notes that the definition of large built-up area and town is same for the purposes of the Green Belt Review unless otherwise stated.</p> <p>The assessment criteria for Purpose A is as follows:</p> <ul style="list-style-type: none"> • Does the parcel act as an effective barrier against sprawl from large built-up areas? • Does the parcel constitute, as part of a wider network of sites, a strategic barrier against the sprawl of large built-up areas? • Is there a robust permanent Green Belt/ development boundary? • Is the land separate from the large built up area? • Would the loss of this Green Belt land potentially lead to ribbon development? 	<p>most sensitive to medium sensitive and would not change the Council’s decision to allocate the site.</p> <p>The Local Plan Inspector’s Report²⁷ comments on the Green Belt evidence at paragraph 191-192:</p> <p><i>“191. For site options in the Green Belt, the Council’s Green Belt Review (2017) was also a key document. The review focuses on land outside the urban area that is not within the SPA/SAC and which scores highly in terms of sustainability. The approach is consistent with the need to protect internationally important ecological areas, and national guidance that requires authorities to take account of patterns of sustainable development when drawing up Green Belt boundaries.</i></p> <p><i>192. The fourth Green Belt purpose is interpreted in the Green Belt Review and site assessment process as preserving the setting and special character of historic features, rather than historic towns as set out in paragraph 80 of the NPPF 2012. However, sensitivity testing involving the neutralisation of this element shows that only a small number of parcels and sites would change from most sensitive to medium sensitive and conclusions regarding suitability for release are</i></p>

²⁷ [Calderdale Local Plan Inspector’s Report document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<ul style="list-style-type: none"> • Would development result in an isolated development site not connected to existing boundaries? • Would development of the parcel create an irregular settlement pattern? • Is this Green Belt parcel connected by two or less boundaries to the built up area? • Is the land contiguous with other Green Belt up to and beyond the District boundary? <p><u>Purpose B</u></p> <p>The areas defined as ‘large built up area’ for Purpose A are considered to represent ‘towns’ for the assessment of Purpose B. The criteria for Purpose B therefore makes reference to ‘large built up area’.</p> <p>The method includes the following criteria:</p> <ul style="list-style-type: none"> • Does the parcel provide part of a gap or space between existing large built-up areas? • What is the nature of the countryside between the towns, rural or semi- rural? • Is there visibility between large built up areas? • Do natural features and infrastructure provide a good physical barrier or boundary to the parcel that would ensure that development was contained? • Is the parcel sparsely developed or undeveloped? • Would the loss of this Green Belt land lead to a significant reduction in the distance between towns? • Would the loss of this Green Belt land increase the potential merging of towns? 	<p><i>not affected as other factors were determinant. The Green Belt Review provides an appropriate framework for assessing harm and has been carried out in a consistent and robust manner.”</i></p>

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<ul style="list-style-type: none"> • Would the loss of this Green Belt land potentially lead to ribbon development between towns? <p><u>Purpose C</u></p> <p>The method includes the following criteria:</p> <ul style="list-style-type: none"> • Is the parcel free from significant encroachment? If there is significant encroachment, what is the proportion as a % of the parcel? • Is there a strong, defensible boundary between the existing urban area and the parcel? • Is there a landscape designation? • Is there a wildlife designation or value? • Is there a geological or geomorphological designation or value? • Is there a rural land use? • Is the land tranquil? • Is there public access or recreational use? • Are the functions of the land consistent with its Green Belt designation? • Does the parcel include any best grade 1, 2 or 3 agricultural land? • Is the parcel free from derelict brownfield land? • Is the predominant use of land and buildings agricultural? <p><u>Purpose D</u></p> <p>The method has regard to where there is a clear visual link between open space within the Green Belt and recognisable historic settlement patterns, for example through the presence of a Conservation Area.</p>	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>A historic settlement was deemed to be a settlement or place with historic features identified in local policy or through conservation areas or other historic designations.</p> <p>The method includes the following criteria:</p> <ul style="list-style-type: none"> • Is the land part of the setting of a historic place or settlement, listed building or conservation area? • Would the loss of this Green Belt land adversely affect the special character of a historic place or settlement? • Would the loss of this Green Belt land reduce the significance of a historic place or settlement? • <p><u>Purpose E</u></p> <p>All parcels are scored the same against this purpose and were therefore scored ‘yes’ for Purpose E.</p> <p><u>Overall assessment</u></p> <p>The assessment judges the value of the Green Belt on the basis of parcel sensitivity by establishing if each parcel meets the five purposes. Parcels that meet 3-5 of the identified purposes are assessed as ‘most sensitive’ and it is proposed that these will be retained in the Green Belt. The remainder of the parcels, meeting 0-2 of the identified purposes have been classified as ‘mid-sensitive’. It is considered that these parcels should ideally be taken forward and considered for detailed study. Each purpose is considered to be equal and no weighting to any of the assessment criteria is applied.</p> <p>Consideration of Green Belt harm</p>	

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>The Green Belt Review did not have a specific harm assessment however the consideration of harm was linked to the sensitivity classification applied as part of the overall assessment process above. The higher number of purposes a Green Belt parcel satisfied, the greater its sensitivity and value. By setting the ‘most’ sensitive classification as Green Belt meeting 3-5 purposes, it was considered that the most valuable Green Belt would be identified and offered protection. By setting the ‘mid’ sensitive classification as Green Belt meeting 0-2 purposes, the least valuable Green Belt would be identified.</p>	
<p>North Hertfordshire Council Local Plan (adopted 8 November 2022)</p> <p>Green Belt Review (2016)²⁸ (North Hertfordshire Council and Amec Foster Wheeler)</p>	<p>General approach and scope</p> <p>The Green Belt Review and Green Belt Review Update seek to assess the performance of strategic land parcels, sub-parcels and sites being considered for development in the Plan against the purposes of Green Belt.</p> <p>The Green Belt Review is split into two parts: Part 1 is a strategic level review of the current Green Belt and a more detailed assessment of potential development sites. Part 2 is an assessment of the countryside beyond the Green Belt.</p> <p>For Part 1, the entire Green Belt was divided into parcels which were assessed against the four purposes of Green Belt. The parcels were then sub-divided into sub-parcels and the same criteria was applied in assessing</p>	<p>The Local Plan Inspector’s Report³² at Issue 3 (paragraph 148 onwards) considers whether the Green Belt Review and its update was a robust evidential basis for determining exceptional circumstances. The Inspector states:</p> <p><i>“150. The Review and the Update consider Green Belt issues in depth. The Review assesses the contribution made by parcels of land to four of the five purposes for including land in the Green Belt. It does not include an assessment against the fifth purpose of including land in the Green Belt, being to assist in urban regeneration by encouraging the recycling of derelict and other</i></p>

²⁸ [Green Belt Review document link](#)

³² [North Herts Local Plan Inspector’s Report document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
<p>Green Belt Review Update (2018)²⁹ (North Hertfordshire Council) and Appendices³⁰</p> <p>(Note: The Green Belt Review Update was undertaken following the submission of the Local Plan due to more recent case law on the definition of ‘openness’ which confirmed it had both a spatial and visual dimension. The Update sought to ensure that both spatial and visual</p>	<p>these against the four purposes of Green Belt. The analysis of strategic parcels and sub-parcels is based on the assessment of the situation ‘as is’.</p> <p>Following the parcel and sub-parcel assessment, sites were assessed against the four Green Belt purposes. The assessment of sites gives consideration to impacts upon Green Belt should the site be developed in future. Sites which passed the three key tests of suitability, availability and achievability in the SHLAA were assessed.</p> <p>The review was completed using a desktop analysis combined with fieldwork involving a visit to each parcel.</p> <p>Approach to defining parcels</p> <p>The entire Green Belt was divided into parcels using boundaries of roads and other clearly visible physical features in the landscape. Following on from this, the parcels were sub-divided into sub-parcels.</p> <p>Approach to assessing the five Green Belt purposes</p> <p><u>Rating</u></p> <p>Qualitative scoring was applied based on the parcel or site making a significant, moderate or limited contribution to Green Belt purposes.</p> <p><u>Purpose A</u></p>	<p><i>urban land. The Council considers that, in effect, the assessments against the other four purposes act as a proxy for this purpose. That is a reasonable stance to take, and I regard the approach taken here to be both suitable and proportionate. Looking firstly at larger swathes of land and then ‘drilling down’ to analyse much smaller sub-parcels, the Review also presents the view of its authors about the overall contribution made by each individual sub-parcel.</i></p> <p><i>151. Potential development sites are also assessed in the Review, again against the same four purposes of including land in the Green Belt. This includes all the sites currently in the Green Belt that are proposed for allocation in the Plan. Criteria are used to represent each purpose, and a scoring system is deployed. For example, in relation to the purpose of preventing towns merging, one criterion used is the distance from the edge of the site to the nearest built-up edge of a town, and scores from one to three are assigned depending on the distance involved.</i></p>

²⁹ [Green Belt Review Update document link](#)

³⁰ [Green Belt Review Update Appendices document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
elements of openness had been properly considered in the assessments – this predominantly related to Purpose C).	<p>The assessment criteria is as follows: What role does the land play in preventing the spread of development outwards from larger settlements?</p> <p>The method does not specifically define ‘large built-up area’ and it is not clear what the larger settlements are deemed to be.</p> <p><u>Purpose B</u></p> <p>The assessment criteria is as follows: What role does the land play in maintaining the separation of towns?</p> <p>The method does not specifically define ‘neighbouring towns’ for the purposes of the assessment. The assessment seems to relate to all inset settlements.</p> <p><u>Purpose C</u></p> <p>The assessment criteria is as follows: Are there already urbanising influences? Does a strong boundary exist to contain development?</p> <p>The Green Belt Review Update mainly impacted upon Purpose C in ensuring that both the spatial and visual dimensions of openness had been considered. Additional criteria were included in the Update to assess ‘visual openness’ and ‘physical openness’ based on low/mixed/high. It is not clear from the method how the ratings were applied and what specifically was taken into account.</p> <p><u>Purpose D</u></p> <p>The assessment criteria is as follows: Is there a link with or views to the historic parts? What relationship or connection does the land have with the character of the town?</p>	<p><i>152.The Review also reaches a view about the overall contribution made by each potential development site to the purposes of including land in the Green Belt. The scoring for each of the individual Green Belt purposes has been considered and professional judgement applied to reach an overall conclusion as to whether the site makes a significant, moderate or limited contribution.</i></p> <p><i>...156.There is no prescribed methodology for undertaking Green Belt assessments of this sort. As I see it, the general approach and methodologies used by the Council are appropriate for the task. All the criteria used throughout the various assessments are rational and suitable. Although laden with planning judgements on the part of the authors, that is inescapable and does not undermine the work in any way. I note that the assessments do not rely on desk top studies but have included field work and visits to the land in question. This is reassuring and bolsters the confidence one can place in the judgements reached.</i></p> <p><i>157.One consequence of the methodology used is that it is possible for a site’s overall contribution to the Green Belt to be judged as less than the contribution it makes in respect of some individual Green Belt purposes. For example, it is possible</i></p>

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>The method does not specifically define ‘historic town’.</p> <p><u>Purpose E</u></p> <p>The method notes that the re-use of previously developed land is achieved consistently through the application of Green Belt policy. Therefore no assessment is made against this criterion.</p> <p><u>Overall assessment</u></p> <p>An overall evaluation of the contribution to Green Belt purposes is undertaken however the approach to this is not described in the method.</p> <p>Consideration of Green Belt harm</p> <p>The Green Belt Review and Green Belt Review Update does not consider Green Belt harm per se. They consider the existing contribution of parcels and sub-parcels to Green Belt purposes. The assessment of sites considered the impact on the Green Belt should the site be developed. The Housing and Green Belt Background Paper³¹ considers the harm to the Green Belt of the proposed allocations at a strategic scale. It considers potential mitigation which could alleviate impacts upon the wider Green Belt. The Green Belt Review Update at paragraph 1.6 refers to ‘...statements and evidence submitted to the Examination by NHDC which considered the harm to the Green Belt of the proposed allocations in the Plan on a case-by-case basis. In line with the principles of relevant case law, this evidence also considered the extent to which these harms might be ameliorated to the fullest reasonable extent should sites be developed.’</p>	<p><i>that a site considered to make a significant contribution in relation to checking unrestricted sprawl could be judged to make a moderate overall contribution. Some suggest that, as a matter of principle, the overall ‘score’ should reflect the highest contribution to any one of the individual purposes.</i></p> <p><i>158.I disagree. In the absence of prescription, it seems to me logical to ‘step back’ and reach a rounded judgement taking into account the performance of the land in question in relation to all the Green Belt purposes overall. Without such a ‘sense check’, one purpose could skew the outcome. For example, almost any incursion of built development into the Green Belt would be at risk of falling foul of the purpose of safeguarding the countryside from encroachment. In an exercise where the purpose is to evaluate the relative value of land parcels to the Green Belt, that would not be helpful. To offer the facility of meaningful comparison, it strikes me as most instructive to consider performance against the purposes of including land in the Green Belt overall. On this point, therefore, I consider the Council’s approach to be appropriate for the task.</i></p>

³¹ [Green Belt Background Paper document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
		<p><i>159. In a number of cases the Update leads to different conclusions from the Review about the overall performance of sites in relation to the purposes of including land in the Green Belt, one way or another. However, this does not undermine the proposed allocations. In my view, taking account of the Council's sustainability appraisal work and the site selection methodology, which I consider later in this report, I am satisfied that the changes involved do not lead to other sites being preferable.</i></p> <p><i>160. Some disagree with the judgements reached in some cases. That is not surprising – even two wholly rational and unbiased individuals can reach different conclusions where judgements of this nature are concerned. Others claim that the methodologies have been applied inconsistently. But I am not persuaded that any inconsistencies undermine the work overall or lead to any wholly unfounded or irrational outcomes.</i></p> <p><i>161. Overall, I am satisfied that the Review and the Update, taken together, properly reflect the fundamental aim of Green Belts, their essential characteristics of openness and permanence, and the five purposes of including land in them. In short, these documents represent a sufficiently</i></p>

Local Authority	Summary of Approach	Local Plan Inspector Comments
<p>Cheshire East Council Local Plan Strategy (adopted 27 July 2017)</p> <p>Green Belt Assessment Update (2015) (Arup)³³</p>	<p>General approach and scope</p> <p>The Green Belt Assessment undertook a two stage approach dividing the entire Cheshire East Green Belt into general areas and assessing these against the five purposes. Following on from this, one width of parcels was defined around all inset settlements and settlements in neighbouring authorities which abutted the Green Belt boundary. These parcels were assessed against the five Green Belt purposes. The general area assessment was undertaken on a desktop basis only. The parcel assessment involved a combination of desktop assessment and a site visit of each parcel.</p> <p>Approach to defining parcels</p> <p>General areas were defined using the strongest boundaries consisting of motorways and A roads.</p> <p>In defining parcels, national and international designations (SSSI, Ramsar, SAC and SPA) were firstly screened out. Parcels were drawn from the settlement inset boundary to the nearest strong boundary in the first instance, followed by moderate and then weak boundaries. A grading priority was given to the boundary features, and this is set out on Table 4-1 of the assessment. All parcels over 5ha were deemed to be ‘large’ and where possible these parcels were reduced using the next categorisation down of boundary features.</p>	<p><i>robust body of evidence that is comfortably fit for the purpose intended.” (emphasis added)</i></p> <p>Local Plan Inspector Interim Views (October 2014)³⁵ - following the Inspector’s Interim Views, several flaws were identified in the Council’s Green Belt Assessment methodology, including:</p> <ul style="list-style-type: none"> • There were several cases where the Green Belt assessment does not support the release of specific sites from the Green Belt and the review appears to have given greater weight to other factors, such as land ownership, availability and deliverability when preparing and finalising the Plan. • There is inconsistency in the scale of the parcels assessed, in that, very large tracts of land have been assessed against smaller sites and some very small areas of land have been omitted. • The review does not consider all the purposes of the Green Belt, omitting the contribution to urban regeneration and preserving the setting and special character of historic towns. Although the latter purpose may apply only to historic towns like Chester, the impact on

³³ [Green Belt Assessment Update document link](#)

³⁵ [Cheshire East Local Plan Inspector’s Interim Views document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>Approach to assessing the five Green Belt purposes</p> <p><u>Rating</u></p> <p>A qualitative scoring system was applied consisting of major, significant, contribution, and no contribution.</p> <p><u>Purpose A</u></p> <p>The ‘large built-up area’ was not specifically defined and was deemed to include all inset urban areas.</p> <p>The assessment included three criteria:</p> <ul style="list-style-type: none"> • Would future development be firmly contained by strong or physical features? • Does the parcel protect open land that is well connected or contained by the urban area and would development help “round off” the settlement pattern? • What role does the parcel play in preventing ribbon development? <p><u>Purpose B</u></p> <p>‘Neighbouring towns’ were defined as all inset settlement and villages.</p> <p>The assessment considered whether a reduction in the gap between the neighbouring towns would compromise the openness of the Green Belt and lead to the actual or perceived merging of the towns. The following</p>	<p>urban regeneration does not seem to have been assessed.</p> <ul style="list-style-type: none"> • <p>In response, a Green Belt Assessment Update was prepared by Arup in 2015 which defined both General Areas and Green Belt parcels.</p> <p>Local Plan Inspector Further Interim Views (December 2015)³⁶ - following the Green Belt Assessment Update (GBAU), the Inspector published his further interim views. Paragraphs 41-46 discuss the Green Belt Assessment Update. The Inspector noted that the independent two stage assessment of general areas followed by smaller parcels, assessing the relative significance of the contribution of each parcel against the five purposes of Green Belt followed by an overall assessment enabled a comprehensive, consistent and proportionate approach to be taken. He notes that only ‘Green Belt factors’ are assessed without potential areas for development thus providing a key input into the site selection process:</p> <p><i>“...the approach set out in the GBAU seems to reflect national policy and address most of the</i></p>

³⁶ Inspector’s further interim views on the additional evidence produced by the Council during the suspension of the examination and its implications for the submitted Local Plan Strategy. Available at: [Cheshire East Local Plan Inspector’s Further Interim View document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>terminology was used to define the gap: essential gap, largely essential gap, and less essential gap. The assessment considered whether natural features or infrastructure played a role in maintaining the presence of the gap.</p> <p><u>Purpose C</u></p> <p>The assessment used the following criteria:</p> <ul style="list-style-type: none"> • Are there strong and robust boundaries to contain development and prevent encroachment in the long term? • Existing urbanising influences: A. What is the existing land use / uses? B. What is the proximity and relationship to the settlement? C. What is the relationship to the countryside? • Does the parcel protect the openness of the countryside? (taking into account built form, long line views and vegetation). • Does the parcel serve a beneficial use of the Green Belt which should be safeguarded? <p><u>Purpose D</u></p> <p>The assessment defines ‘historic town’ based on the Cheshire Historic Towns Survey (2003) and the Cheshire Historic Landscape Assessment (2007). It also considered whether the settlement was listed in the Domesday Book and the historic fabric linked to a Conservation Area.</p> <p>The assessment uses the following criteria:</p> <ul style="list-style-type: none"> • Is the parcel near to a ‘historic town’? • Has the historic core been diluted through modern infill development within the development limits? In order to assess this, the proximity of historic elements to the Green Belt was considered 	<p><i>shortcomings of the previous Green Belt assessment. It provides a set of more comprehensive and proportionate evidence to inform, rather than determine, where the release of Green Belt land may be necessary at the site-selection stage.” (Paragraph 46)</i></p> <p>The Inspector dismisses participants concerns relating to boundary definition noting that “...in most cases, “strong” boundaries have been used, taking account of established physical features and committed new road schemes, where appropriate; the size of most of the larger land parcels has been reduced, with a 5ha indicative threshold for strategic sites, and detailed points about specific land parcels, including the identification of smaller and larger sites, can be reconsidered at the site-selection stage.” (Paragraph 44)</p> <p>The Inspector acknowledges the complexity of the process and the involvement of professional judgements. He emphasises the needs for consistency and transparency using available and proportionate evidence: “<i>This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site</i></p>

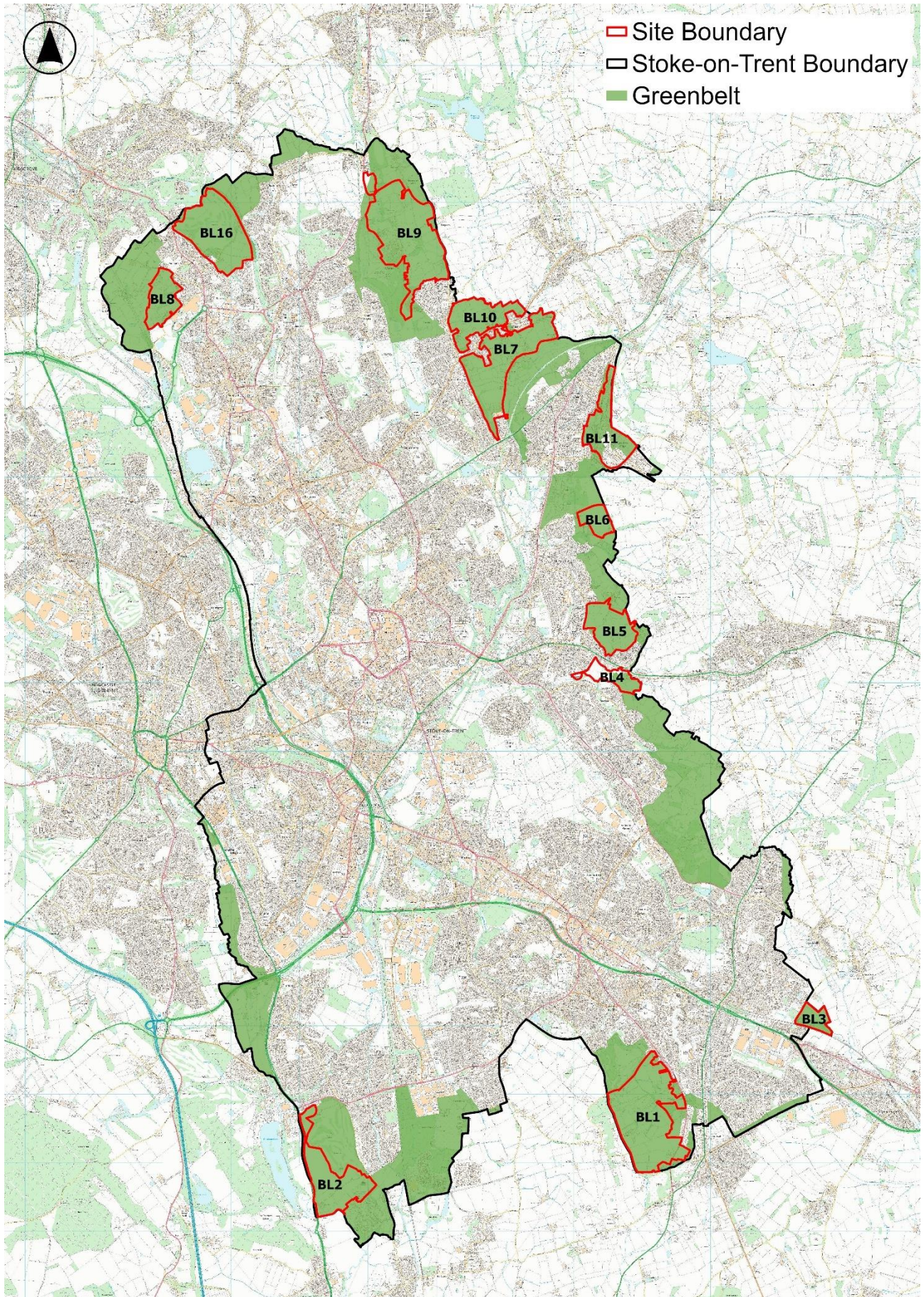
Local Authority	Summary of Approach	Local Plan Inspector Comments
	<p>based on a buffer of 500m for those ‘historic towns’ which were Principal Towns and 250m for those which were Key Service Centres and Local Centres.</p> <ul style="list-style-type: none"> • What role does the Green Belt play in preserving the setting and special character of the historic town? (This takes into account views, landmarks, and historic features). <p><u>Purpose E</u></p> <p>The assessment of Purpose E took into account the brownfield and urban potential of settlements within Cheshire East as well as the neighbouring authorities. A percentage was calculated taking into the brownfield commitments within each settlement against the total dwellings within that settlement. A threshold range was attributed to the level of contribution and each parcel was assessed taking into account the brownfield urban potential of the respective settlement.</p> <p><u>Overall assessment</u></p> <p>The document provides guidance on how to assess the overall contribution. Where there is a clear majority contribution, this is applied in most cases. In other cases, professional judgement is applied taking into account the overall aim and purpose of the Green Belt.</p> <p>Consideration of Green Belt harm</p> <p>The Site Selection Methodology³⁴ details the Site Selection Process which included Green Belt Site Assessments which considered the following:</p>	<p><i>visits by CEC’s officers or consultants to confirm the assessments and judgements. More particularly, the GBAU is the only comprehensive evidence which assesses all potential land parcels on an objective, consistent and comprehensive basis” (Paragraph 44)</i></p> <p>In relation to the inclusion of Purpose D, the Inspector comments: <i>“The assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant.” (Paragraph 45)</i></p> <p>He notes that the assessment of Purpose E: <i>“...largely focuses on brownfield sites within the nearest settlement, and enables a differentiation between settlements to be made and provides a consistent, transparent and proportionate approach to this element of the assessment; the focus on regeneration issues internal to Cheshire East reflects the views of the Greater Manchester authorities. The overall assessment involves matters of judgement and confirms that each purpose was given equal weighting and provides</i></p>

³⁴ [Cheshire East Site Selection Methodology document link](#)

Local Authority	Summary of Approach	Local Plan Inspector Comments
	<ul style="list-style-type: none"> • potential area of Green Belt for release • Green Belt assessment for potential area of release • resulting Green Belt boundary • assessment of surrounding Green Belt • exceptional circumstances. 	<p><i>the reasons for the overall assessment.”</i> (Paragraph 45)</p> <p>Local Plan Inspector Interim Views on the Further Modifications (December 2016) - the Inspector did not provide any further comments on the Green Belt methodology however reiterated his comments made in December 2015 supporting the approach and methodology taken.</p>

Appendix B

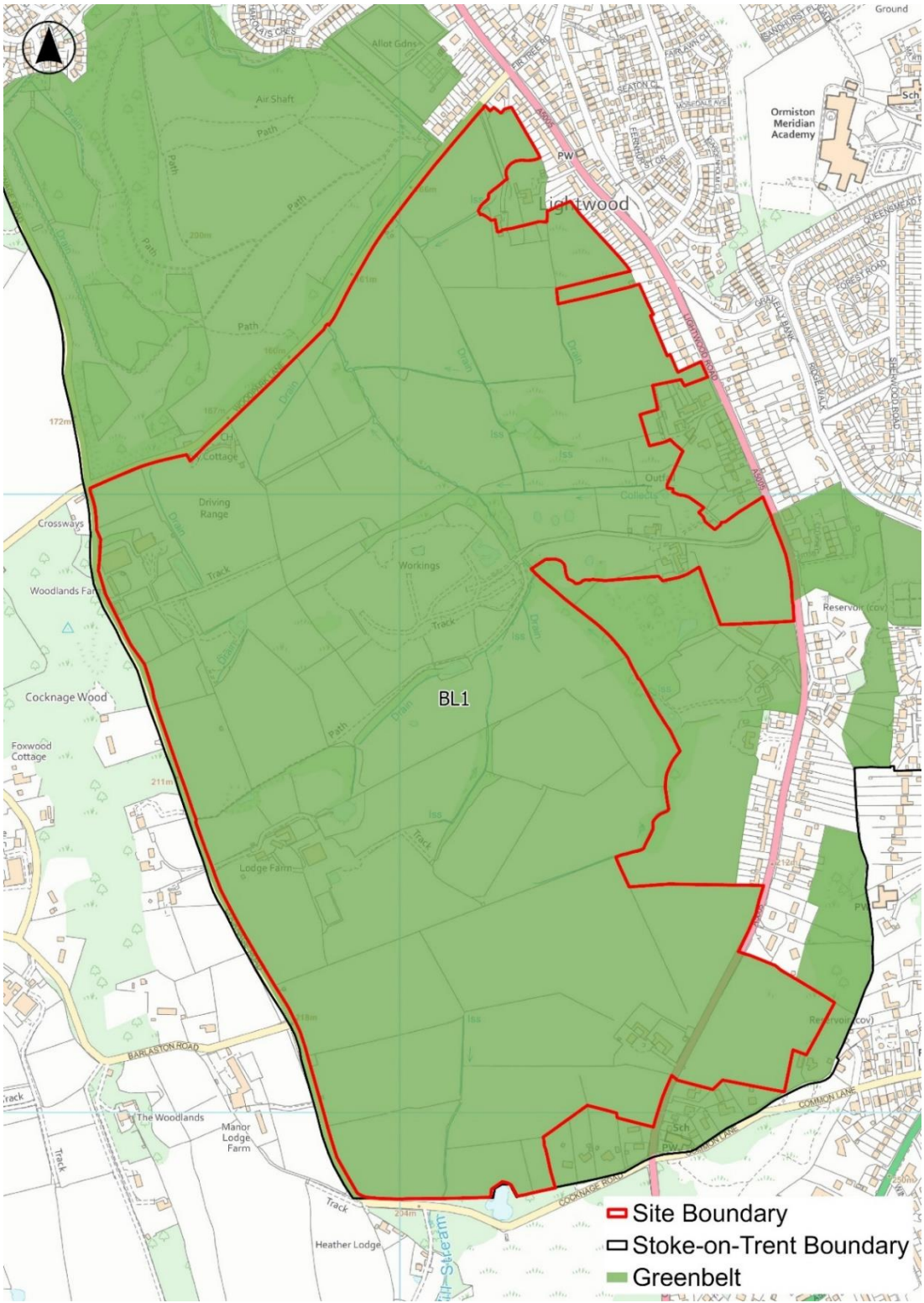
Map - Green Belt Sites



Appendix C

Green Belt Site Assessment Proformas

C.1 BL1



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside although it contains some existing development including Copshurst Quarry, residential properties and farm buildings. The boundaries between the site and the large built-up area to the east are mixed but are predominantly less durable consisting of the rear gardens of residential properties with some short sections of A5005 Lightwood Road. The boundaries between the site and the wider Green Belt are durable consisting of Woodpark Lane to the north, Cocknage Road to the west, and Cocknage Road/Common Lane to the south. As such, the site has physical features that could restrict and contain development. The site is connected to the large built-up area along the site's eastern boundary however new development would not result in an incongruous pattern of development. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in a gap between the Stoke-on-Trent urban area and Stone in neighbouring Stafford. The site forms a very small part of the gap between the defined towns where development would not have any impact on the visual, physical or perceived separation between the towns. Overall, the site makes a weak contribution to this purpose.</p>	Weak contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including farm buildings and sparsely located residential properties. Although not a rural land use, but typically located in rural areas, Copshurst Quarry is located in the middle of the site. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The site's topography slopes down towards the south. The site is surrounded by open countryside along most of its boundaries including the northern, western, and southern boundaries although the settlement of Meir Heath is located to the south east. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution
Purpose d: To preserve the setting and special character of historic towns	
<p>The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located</p>	Weak contribution

Green Belt Purpose Assessment		Contribution
in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.		
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.		Moderate contribution
Overall Assessment		
The site makes a strong contribution to one purpose, a moderate contribution to two purposes, and a weak contribution to two purposes. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and there are durable boundaries between the site and the wider Green Belt, which can contain development and prevent it from threatening the overall openness and permanence of the Green Belt.		Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?
Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as development would be contained by durable boundaries to the north, west and south.

Green Belt Impact Assessment

Purpose b – Development of the site would slightly reduce the gap between the Stoke-on-Trent urban area and Stone (in neighbouring Stafford). Due to the size of the gap, this would represent a limited decrease in the separation of the towns, and it would not result in them merging.

Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.

Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?

If the site is removed from the Green Belt and developed, the surrounding Green Belt to the north of the site would become enclosed by development which is likely reduce the sense of openness in this remaining area of Green Belt. Removal of the site would also result in islands of Green Belt remaining to the east of the site which is likely to impact their function and purpose. It is therefore recommended that if the site is taken forward, the boundary is extended to the east to the A5005 Lightwood Road to release these pockets of Green Belt alongside the site.

Are there any cumulative impacts (due to release of adjacent sites)?

There are no other sites in this location under consideration which are likely to have cumulative impacts.

Conclusion

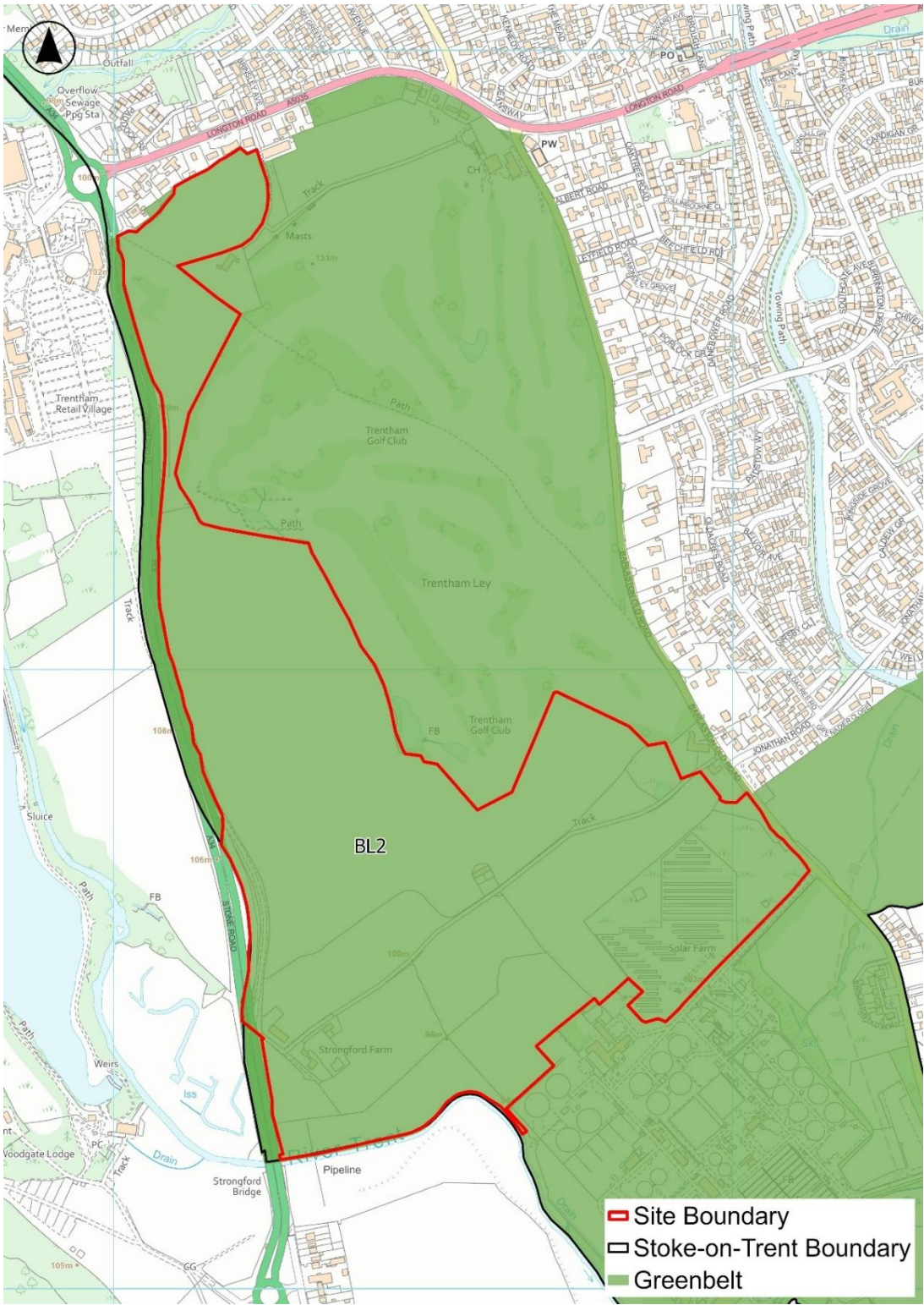
The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl, as it would be reasonably contained by durable boundaries to the north, west and south. Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area. Removal of the site from the Green Belt is likely to have localised impacts on the surrounding Green Belt to the north and east. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

Recommendation: Take site forward for further consideration.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

The new Green Belt boundary would be defined by Woodpark Lane to the north and Cocknage Road to the west and south which represent recognisable and permanent boundaries.

C.2 BL2



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside although it contains some existing development farm buildings, sparsely located residential properties and solar PV panels. The boundary between the site and the large built-up area to the north is less durable consisting of the rear gardens of residential properties. The boundaries between the site and the wider Green Belt are durable consisting of the A34 Stone Road to the west, part of the River Trent to the south, part of the limits of the Severn Trent Water Pump Station to the south, Barlaston Old Road to the east, and the limits of Trentham Golf Course to the east which all represent recognisable and permanent boundaries. As such, the site has physical features that could restrict and contain development. The site is connected to the large built-up area along the site's northern boundary however new development would not result in an incongruous pattern of development. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in a gap between the Stoke-on-Trent urban area and Stone in neighbouring Stafford. The site forms a very small part of the gap between the defined towns where development would not have any impact on the visual, physical or perceived separation between the towns. Overall, the site makes a weak contribution to this purpose.</p>	Weak contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including farm buildings and sparsely located residential properties across the site. Other existing development on the site includes solar PV panels located in the south eastern corner of the site. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The site has an undulating topography and slopes down towards the south. The site is surrounded by open countryside to the west and south west although the southern boundary partly adjoins existing development in the Green Belt consisting of Severn Trent Water Pump Station and the north western boundary adjoins existing development in the Green Belt consisting of Trentham Estate. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution

Green Belt Purpose Assessment		Contribution
Purpose d: To preserve the setting and special character of historic towns		
The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.		Weak contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.		Moderate contribution
Overall Assessment		
The site makes a strong contribution to one purpose, a moderate contribution to two purposes, and a weak contribution to two purposes. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and there are durable boundaries between the site and the wider Green Belt, which could contain development and prevent it from threatening the overall openness and permanence of the Green Belt.		Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?

Green Belt Impact Assessment

Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as development would be contained by durable boundaries to the west and south. Purpose b – Development of the site would slightly reduce the gap between the Stoke-on-Trent urban area and Stone (in neighbouring Stafford). Due to the size of the gap, this would represent a limited decrease in the separation of the towns, and it would not result in them merging.

Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.

Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment but it does not form part of the setting of the historic town as it is located a significant distance from the historic core. Therefore, development would not impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?

If the site is removed from the Green Belt and developed, the remaining Green Belt to the east of the site (consisting of Trentham Golf Club) would become completely enclosed by development and disconnected from the surrounding Green Belt which is likely to reduce the sense of openness in this remaining area of Green Belt.

Are there any cumulative impacts (due to release of adjacent sites)?

There are no other sites in this location under consideration which are likely to have cumulative impacts.

Conclusion

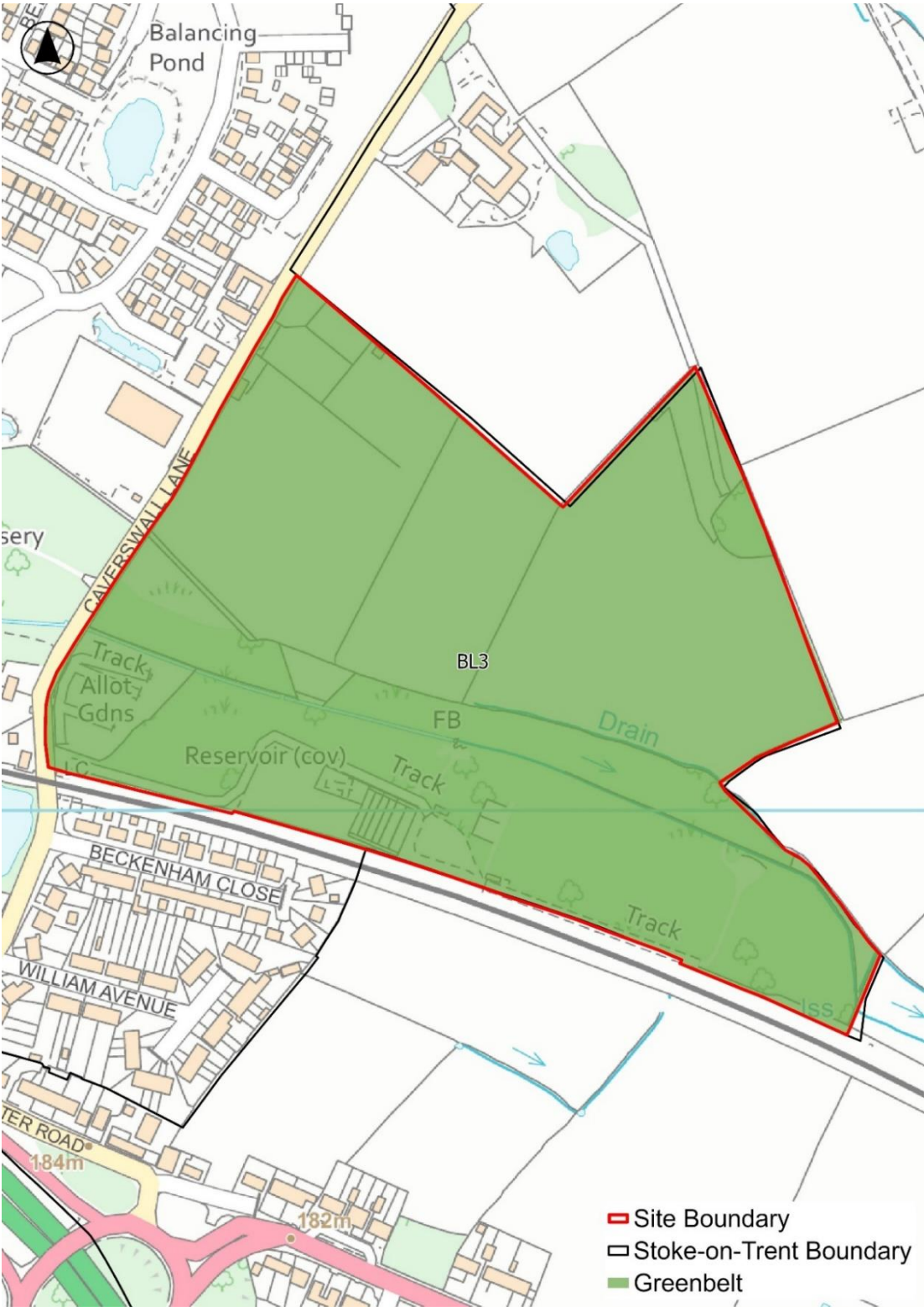
The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging, it would not represent unrestricted sprawl, and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area. Removal of the site from the Green Belt is likely to have localised impacts on the surrounding Green Belt to the east which will become disconnected from the surrounding remaining Green Belt. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

Recommendation: Take site forward for further consideration.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

The new Green Belt boundary would be defined by A34 Stone Road to the west, part of the River Trent to the south, part of the limits of the Severn Trent Water Pump Station to the south, and Barlaston Old Road to the east which all represent recognisable and permanent boundaries.

C.3 BL3



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside and contains an allotment and limited existing development including farm buildings. The boundaries between the site and the large built-up area are durable consisting of Caverswall Lane to the west and the railway line to the south. The boundaries between the site and the wider Green Belt to the north and east are less durable consisting of trees and field boundaries. As such, due to the inner boundary, the site has physical features that could restrict and contain development. The site is connected to the large built-up area along the site's western and southern boundaries however new development would not result in an incongruous pattern of development. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in a gap between the Stoke-on-Trent urban area and Cheadle in neighbouring Staffordshire Moorlands. The site forms a very small part of the gap between the defined towns where development would not have any impact on the visual or perceived separation between the towns. Overall, the site makes a weak contribution to this purpose.</p>	Weak contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including an allotment and farm buildings. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The site's topography is mostly flat but slightly slopes down towards the south. The site is surrounded by open countryside to the north and east. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution
Purpose d: To preserve the setting and special character of historic towns	
<p>The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.</p>	Weak contribution

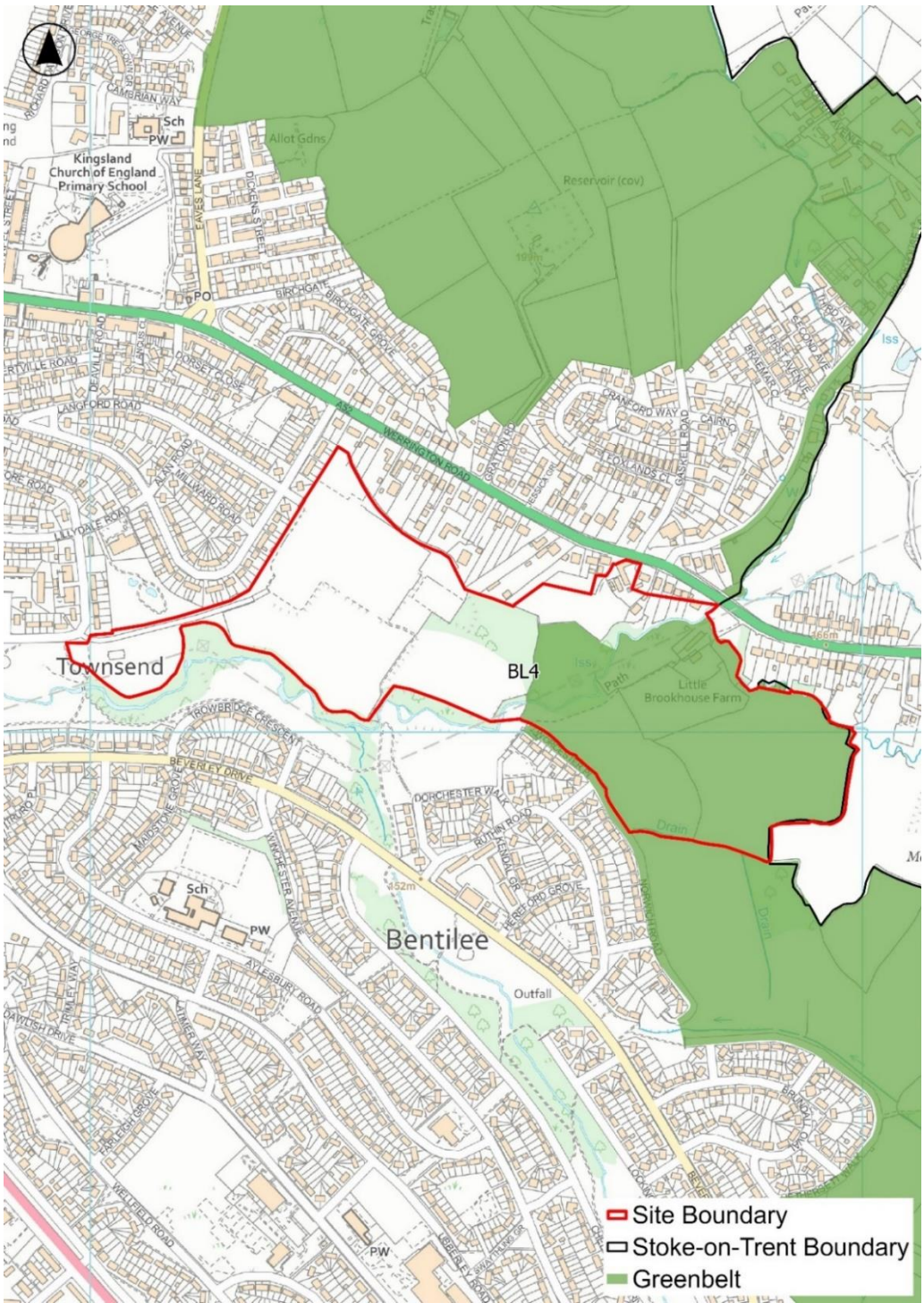
Green Belt Purpose Assessment		Contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.		Moderate contribution
Overall Assessment		
The site makes a strong contribution to one purpose, a moderate contribution to two purposes, and a weak contribution to two purposes. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and there are durable boundaries between the site and the large built-up area, which can contain development and prevent it from threatening the overall openness and permanence of the Green Belt.		Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?
<p>Purpose a – Development of the site could result in the risk of unrestricted sprawl unless a new durable outer boundary is created.</p> <p>Purpose b – Development of the site would slightly reduce the gap between the Stoke-on-Trent urban area and Cheadle (in neighbouring Staffordshire Moorlands). Due to the size of the gap, this would represent a limited decrease in the separation of the towns, and it would not result in them merging.</p> <p>Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.</p>

Green Belt Impact Assessment
<p>Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.</p>
<p>What is the impact on the function and purposes of the surrounding Green Belt of removing the site?</p>
<p>If the site is removed from the Green Belt and developed, the surrounding Green Belt would continue to perform the same function and purpose. Removal of the site would not exacerbate any of the above impacts.</p>
<p>Are there any cumulative impacts (due to release of adjacent sites)?</p>
<p>There are no other sites in this location under consideration which are likely to have cumulative impacts.</p>
<p>Conclusion</p>
<p>The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not result in unrestricted sprawl provided that a new durable outer boundary is created. Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.</p> <p>Recommendation: Take site forward for further consideration.</p>
<p>Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?</p>
<p>The site's existing outer boundaries are less durable consisting of field boundaries and tree line to the north and east. If the site is taken forward, it is recommended that the existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.</p>

C.4 BL4



Note: For the purposes of the assessment, only the area of the site within the Green Belt has been assessed.

Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside and contains Little Brook House Farm. The boundaries between the site and the large built-up area to the north are mixed but are predominantly less durable consisting of trees and the rear gardens of residential properties, with a short section of Causley Brook. The boundaries between the site and the large built-up area (based on the Green Belt within the site) are mixed consisting of Worcester Place/Norwich Road to the south west which is durable, and Causley Brook to the north and field boundaries to the west (although this is within the site boundary) which are less durable. The boundaries between the site and the wider Green Belt are less durable consisting of trees field boundaries, and the rear gardens of residential properties to the east, south and north east. As such, due to the inner boundary, the site has some physical features that could restrict and contain development. The site is partly enclosed by the large built up area to the north and south west such that new development would not result in an incongruous pattern of development and could be considered to round off the settlement pattern in the western half of the site. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in a gap between the Stoke-on-Trent urban area and Cheadle in neighbouring Staffordshire Moorlands. The site forms a very small part of the gap between the defined towns where development would not have any impact on the visual, physical or perceived separation between the towns. Overall, the site makes a weak contribution to this purpose.</p>	Weak contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including Little Brook House Farm. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The site's topography slopes down towards the west. The site is partly enclosed by existing development along its northern, south western and north eastern boundaries however it is connected to the open countryside to the south east. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution

Green Belt Purpose Assessment		Contribution
Purpose d: To preserve the setting and special character of historic towns		
The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.		Weak contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.		Moderate contribution
Overall Assessment		
The site makes a strong contribution to one purpose, a moderate contribution to two purposes, and a weak contribution to two purposes. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and although it has less durable boundaries between the site and the wider Green Belt, the site is partly enclosed by the large built-up area and could be considered to round off the settlement pattern.		Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?

Green Belt Impact Assessment

Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as the site is partly enclosed by the large built-up area and development of the western half of the site could be considered to round off the settlement pattern.

Purpose b – Development of the site would slightly reduce the gap between the Stoke-on-Trent urban area and Cheadle (in neighbouring Staffordshire Moorlands). Due to the size of the gap, this would represent a limited decrease in the separation of the towns, and it would not result in them merging.

Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.

Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?

If the site is removed from the Green Belt and developed, the surrounding Green Belt would continue to perform the same function and purpose. Removal of the site would not exacerbate any of the above impacts.

Are there any cumulative impacts (due to release of adjacent sites)?

There is one site under consideration to the north of the site located to the south east of Abbey Hulton (BL5). There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.

Conclusion

The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl, as it is partly enclosed by the large built-up area and development of the western half of the site could be considered to round off the settlement pattern. Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

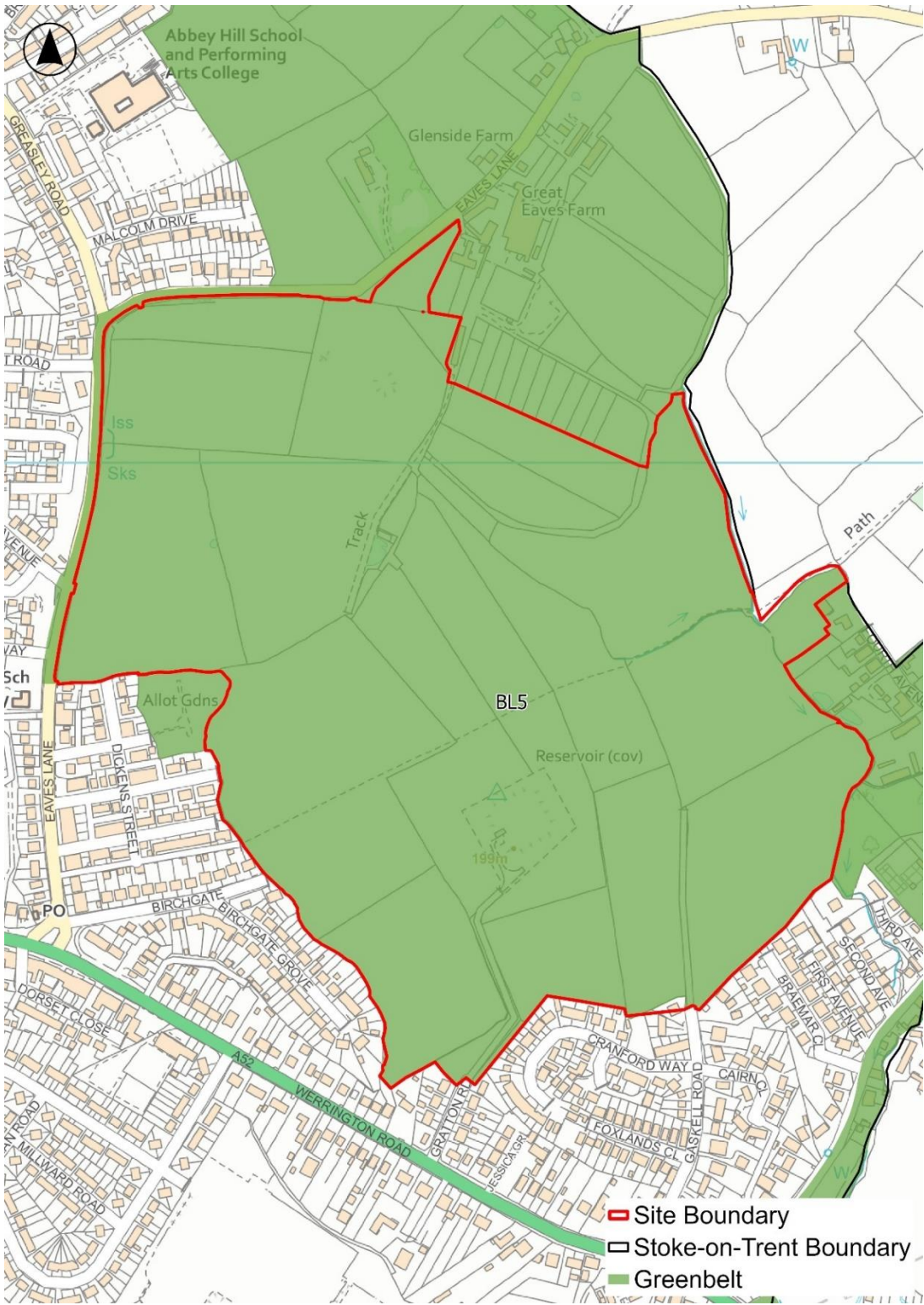
Recommendation: Take site forward for further consideration.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

Green Belt Impact Assessment

The site's existing outer boundaries are less durable consisting of trees, field boundaries and the rear gardens of residential properties to the north east, south and east. If the site is taken forward, it is recommended that the existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.

C.5 BL5



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside containing a small amount of existing developments including farm buildings. The boundaries between the site and the large built-up area are mostly less durable consisting of the rear gardens of residential properties and trees, with some durable boundaries including Eaves Lane along part of the western and northern boundary. The boundaries between the site and the wider Green Belt are less durable consisting of tree lines and field boundaries with a small section of Eaves Lane to the north. There are no other durable boundaries in reasonable proximity. As such, the site has limited physical features that could restrict and contain development. The site is largely enclosed by the large built-up area along the site's northern, western, and southern boundaries such that new developments would not result in an incongruous pattern of development and could be considered to round off the settlement pattern. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is not located in a gap between neighbouring towns and it makes no contribution to this purpose.</p>	No contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of small amount of rural land uses including farm buildings. The site has a strong degree of openness with less than 10% built form and open long line view from multiple viewpoints, due to its low level of development and vegetation. The site's topography is undulating with a small hill at both the northern and southern part of the site, which blocks open long line view at certain viewpoints. The site is largely enclosed by existing development along its northern, western, southern, and south eastern boundaries. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution
Purpose d: To preserve the setting and special character of historic towns	
<p>The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant</p>	Weak contribution

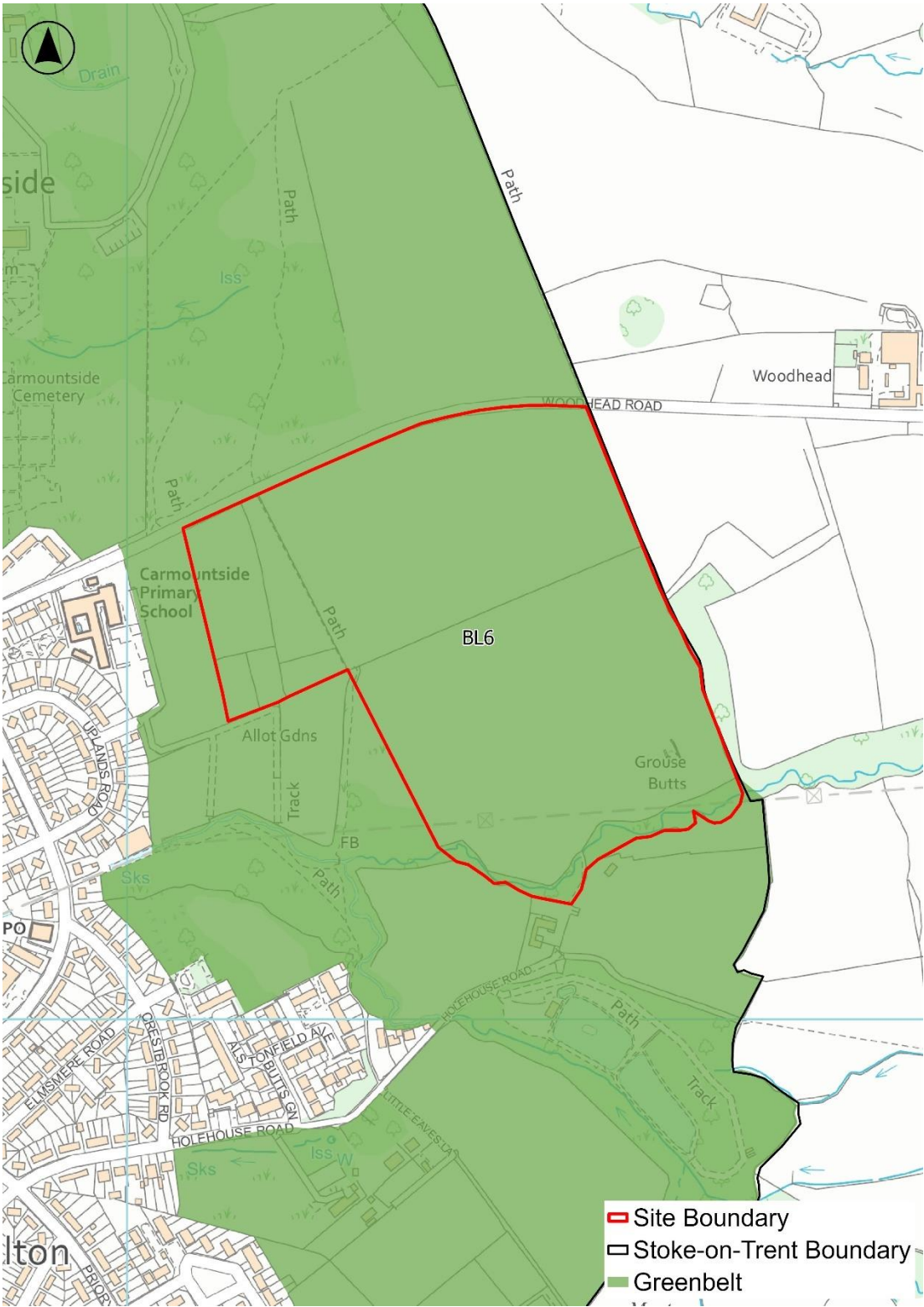
Green Belt Purpose Assessment	Contribution
distance away from it. Overall, the site makes a weak contribution to this purpose.	
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.	Moderate contribution
Overall Assessment	
The site makes a strong contribution to one purpose, a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to one purpose. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and although it has mostly less durable boundaries between the site and the wider Green Belt, and between the site and the large built-up area, the site is largely enclosed by the large built-up area and could be considered to round off the settlement pattern.	Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?
<p>Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as the site is largely enclosed by the large built-up area and development of the site could be considered to round off the settlement pattern.</p> <p>Purpose b – Development of the site would have no impact on preventing towns from merging as it is not located in a gap between neighbouring towns.</p>

Green Belt Impact Assessment
<p>Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.</p> <p>Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.</p>
<p>What is the impact on the function and purposes of the surrounding Green Belt of removing the site?</p>
<p>If the site is removed from the Green Belt and developed, the surrounding Green Belt would continue to perform the same function and purpose. Removal of the site would not exacerbate any of the above impacts.</p>
<p>Are there any cumulative impacts (due to release of adjacent sites)?</p>
<p>There is one site under consideration to the south of the site located to the south of Werrington Road (BL4). There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.</p>
<p>Conclusion</p>
<p>The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl, as it is largely enclosed by the large built-up area and development could be considered to round off the settlement pattern. Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.</p> <p>Recommendation: Take site forward for further consideration.</p>
<p>Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?</p>
<p>The site's existing outer boundaries are mostly less durable apart from a small section of Eaves Lane to the north. The remaining existing boundaries consist of tree line and field boundaries. If the site is taken forward, it is recommended that existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.</p>

C.6 BL6



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
The site is not directly adjacent to the Stoke-on-Trent urban area and therefore makes no contribution to this purpose.	No contribution
Purpose b: To prevent neighbouring towns merging into one another	
The site is not located in a gap between neighbouring towns and it makes no contribution to this purpose.	No contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
The site consists of open countryside. The site has a strong degree of openness with less than 10% built form and open long line views. Vegetation on site is predominantly grassland and hedgerows. The topography is undulating across the site. The site is surrounded by open countryside to the north, east and south with an area of allotments to the west adjacent to the urban area. Overall, the site makes a strong contribution to this purpose.	Strong contribution
Purpose d: To preserve the setting and special character of historic towns	
The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.	Weak contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.	Moderate contribution
Overall Assessment	
The site makes a strong contribution to one purpose, a moderate contribution to one purpose, a weak contribution to one purpose and no contribution to two purposes. In line with the methodology, professional	Moderate contribution

Green Belt Purpose Assessment	Contribution
judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. Although the site supports a strong degree of openness and has a mix of durable and less durable boundaries, it makes no contribution to two purposes.	

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?
<p>Purpose a – Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not directly adjacent to the large built-up area.</p> <p>Purpose b – Development of the site would have no impact on preventing towns from merging as it is not located in a gap between neighbouring towns.</p> <p>Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.</p> <p>Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.</p>
What is the impact on the function and purposes of the surrounding Green Belt of removing the site?
If the site is removed from the Green Belt and developed, it would result in an island of Green Belt release given that the site does not directly adjoin the urban area. As such, it is recommended that the site is only taken forward if the western boundary of the site is extended to the west to join the settlement.
Are there any cumulative impacts (due to release of adjacent sites)?
There is one site under consideration to the north east of the site located to the east of Baddeley Edge (BL11) and a further site to the south (BL5) There would be no cumulative impacts

Green Belt Impact Assessment

resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.

Conclusion

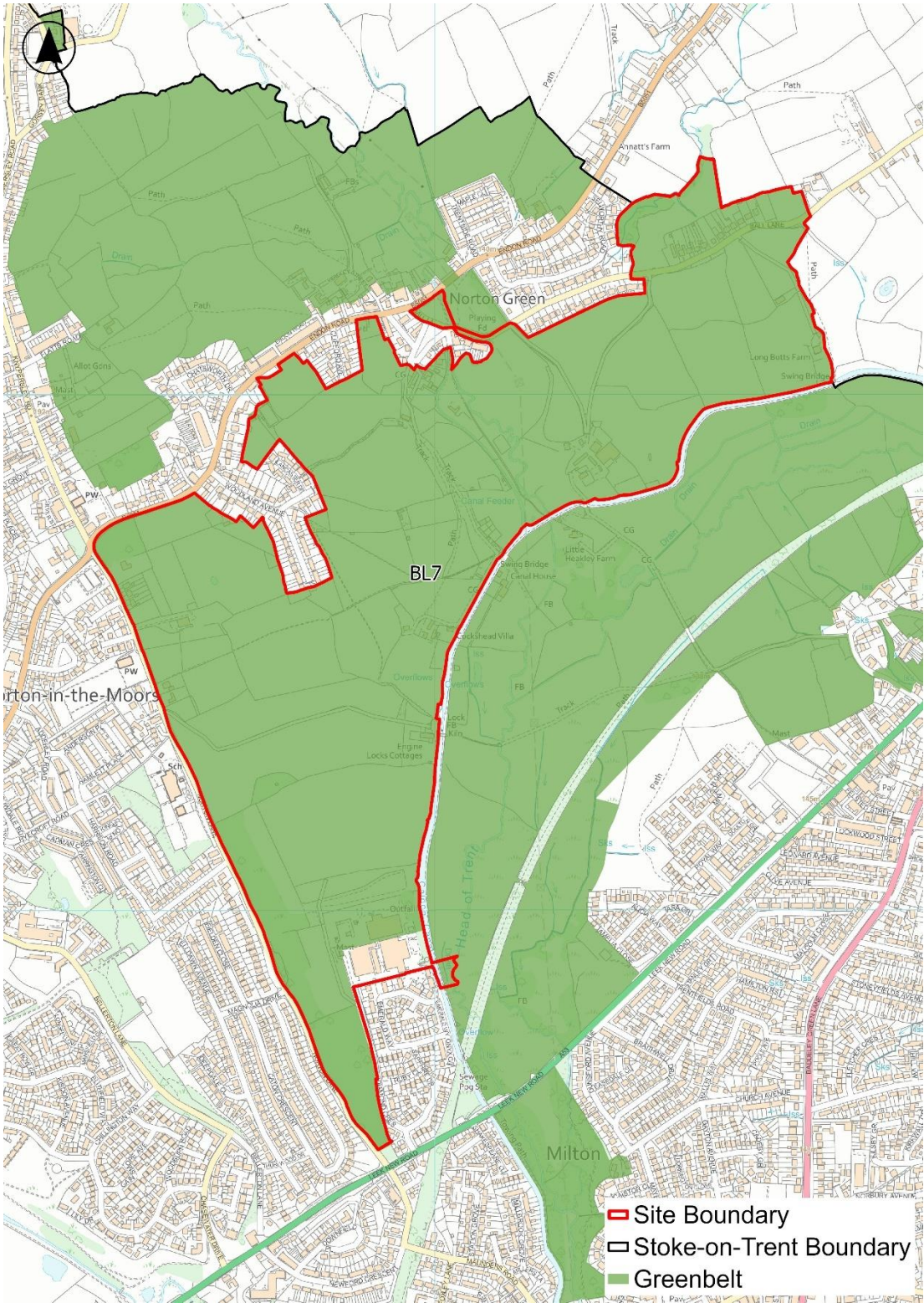
The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging, it would not represent unrestricted sprawl, and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area. Removal of the site from the Green Belt should only be considered if the site boundary is extended to the west to join the urban area. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

Recommendation: Take site forward for further consideration.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

Assuming the site boundary is extended to the west to join the urban area, the new Green Belt boundary would be defined by Woodhead Road to the north which represents a recognisable and permanent boundary. The remainder of tree line and field boundaries to the east and south. If the site is taken forward, it is recommended that the existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.

C.7 BL7



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside although it contains some existing development including residential properties, farm buildings, and pylons. The boundaries between the site and the large built-up area to the south, west and north are predominantly durable consisting of Norton Lane to the west, Diamond Crescent to the south, and sections of B5051 Endon Road to the north, with the remaining northern and southern boundaries being less durable consisting of rear gardens of residential properties and field boundaries. The boundaries between the site and the wider Green Belt consist of durable boundaries of Caldron Canal to the south east, and less durable boundary of field boundaries to the east. As such, the site has physical features that could restrict and contain development. The site is partially enclosed by the large built-up area along the site's southern, western, and northern boundaries, such that new development would not result in an incongruous pattern of development and could be considered to round off the settlement pattern in the western part of the site. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is not located in a gap between neighbouring towns and it makes no contribution to this purpose.</p>	No contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including farm buildings, and sparsely located residential properties. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The site's topography slopes down towards the south east. The site is partly enclosed by the large built-up area along the southern, western, and northern boundaries which impacts the sense of openness in parts. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution
Purpose d: To preserve the setting and special character of historic towns	
<p>The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located</p>	Weak contribution

Green Belt Purpose Assessment	Contribution
in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.	
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.	Moderate contribution
Overall Assessment	
The site makes a strong contribution to one purpose, a moderate contribution to two purposes, and a weak contribution to one purpose, and no contribution to one purpose. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and there are predominantly durable boundaries between the site and both the large built-up area and the Green Belt, which could contain development and prevent it from threatening the overall openness and permanence of the Green Belt.	Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?
Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as development would be contained by a durable boundary to the south east.

Green Belt Impact Assessment

Purpose b – Development of the site would have no impact on preventing towns from merging as it is not located in a gap between neighbouring towns

Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.

Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?

If the site is removed from the Green Belt and developed, the surrounding Green Belt to the south east would become enclosed by development which is likely to reduce the sense of openness in this remaining area of Green Belt, which could impact its function and purpose.

Are there any cumulative impacts (due to release of adjacent sites)?

There are three sites under consideration to the north west and to the south east of the site, located near Bemersley Green (BL9), to the north of Norton Green (BL10) and to the east of Baddeley Edge (BL11) respectively. There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.

Conclusion

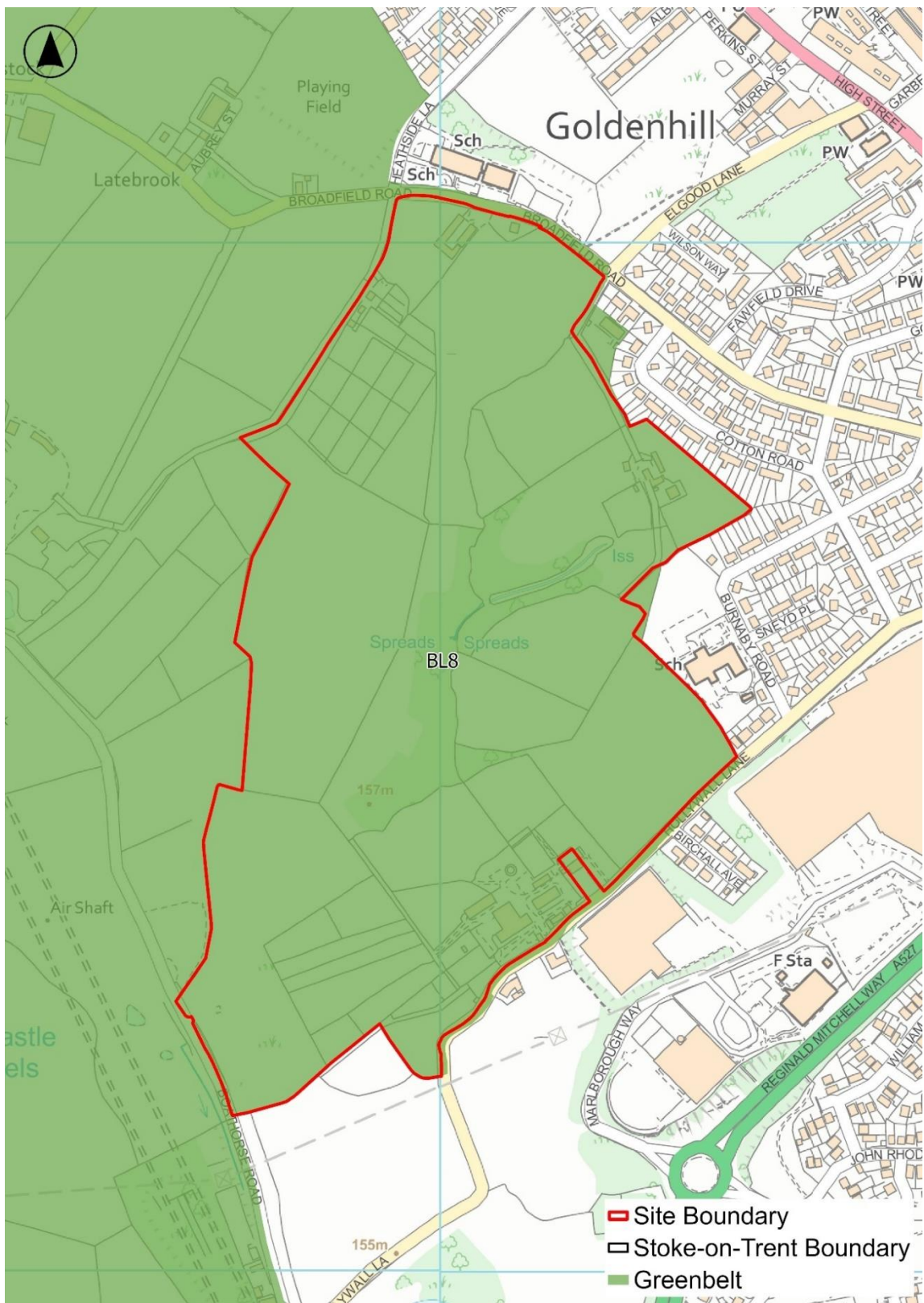
The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl, as it would be reasonably contained by durable boundary to the south east. Removal of the site from the Green Belt is likely to have localised impacts on the surrounding Green Belt to the south east. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

Recommendation: Take site forward for further consideration.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

The new Green Belt boundary would be defined by Caldon Canal to the south east which represents a recognisable and permanent boundary. The site's existing eastern outer boundary is less durable consisting of field boundaries. If the site is taken forward, it is recommended that the existing eastern boundary is strengthened to create a recognisable and permanent Green Belt boundary.

C.8 BL8



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside although it contains some existing development including fences, pylons, residential properties and farm buildings. The boundaries between the site and the large built-up area to the north, east and south are mixed, containing durable boundaries of Broadfield Road to the north and Hollywall Lane to the southeast with the remaining inner boundaries being less durable consisting of field boundaries, rear gardens of residential development, trees, and a private track. The boundaries between the site and the wider Green Belt are predominantly less durable consisting of field boundaries and a private track, with a short section of Boathorse Road to the southwest. There are no other durable boundaries in reasonable proximity. As such, the site has limited physical features that could restrict and contain development. The site is partially enclosed by the large built-up area along the site's northern, eastern, and southern boundaries, such that new development would not result in an incongruous pattern of development and could be considered to round off the settlement pattern. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in a gap between the Stoke-on-Trent urban area and Kidsgrove in neighbouring Newcastle-under-Lyme. The site forms part of the gap between towns where there is scope for some development without reducing the visual, physical or perceived separation between the towns, given that the gap is already narrower to the north of the site. Overall the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including farm buildings, and a cluster of residential properties along the site's southern boundary. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The site's topography slightly slopes down towards the west. The site is partly enclosed by the large built-up area along its northern, eastern, and southern boundaries however it is still connected to the surrounding open countryside to the west and north west. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution

Green Belt Purpose Assessment		Contribution
Purpose d: To preserve the setting and special character of historic towns		
The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.		Weak contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.		Moderate contribution
Overall Assessment		
The site makes a strong contribution to one purpose, a moderate contribution to three purposes, and a weak contribution to one purpose. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and although it has a mix of durable and less durable boundaries with both the built up area and the Green Belt, the site is partially enclosed by the large built-up area and could be considered to round off the settlement pattern.		Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site's grey belt status.

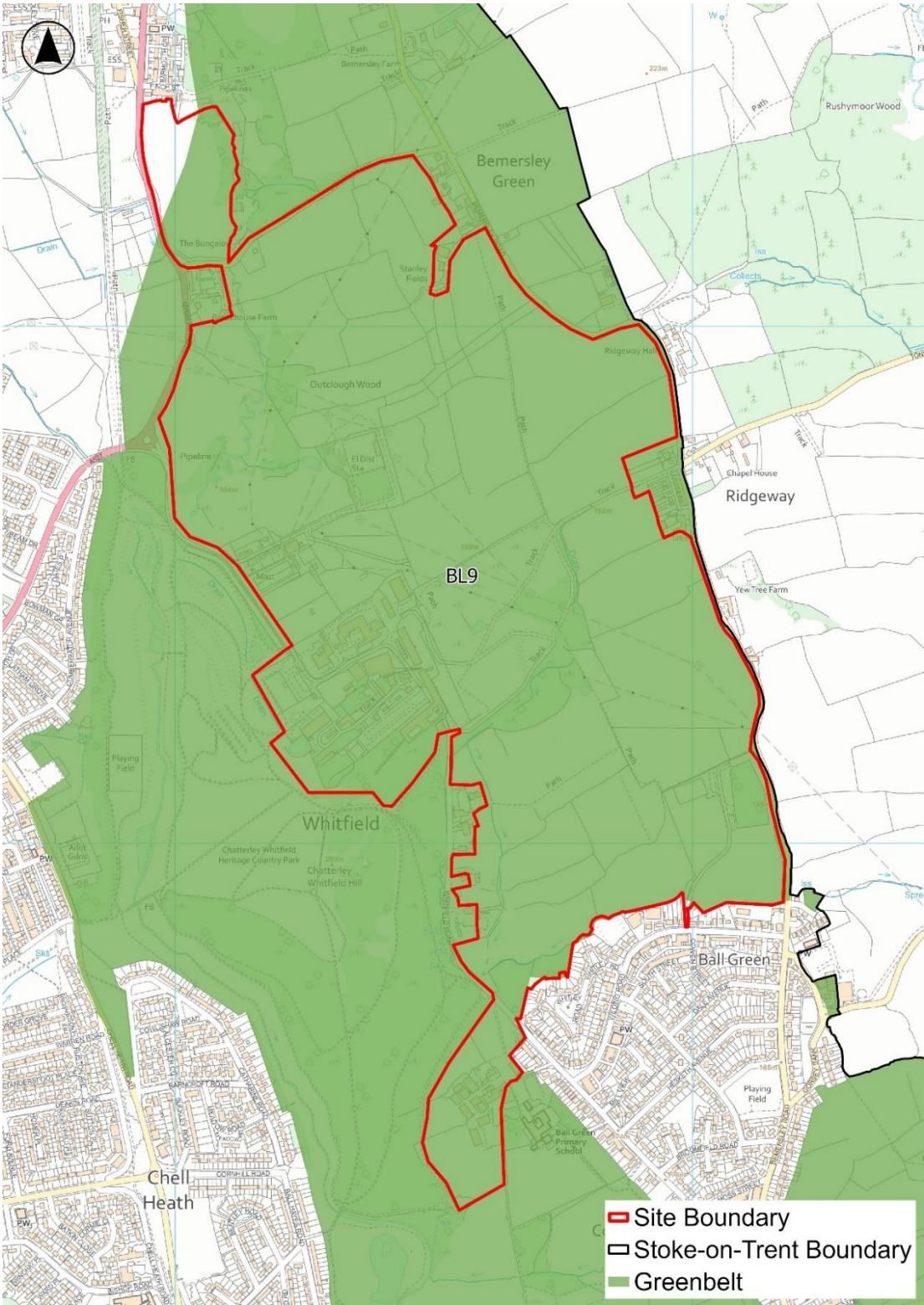
Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?

Green Belt Impact Assessment
<p>Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as the site is partially enclosed by the large built-up area and development could be considered to round off the settlement pattern.</p> <p>Purpose b – Development of the site would reduce the gap between the Stoke-on-Trent urban area and Kidsgrove (in neighbouring Newcastle-under-Lyme). Given that the gap is already narrower to the north of the site, this would represent a small decrease in the separation of the towns, and it would not result in them merging.</p> <p>Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.</p> <p>Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.</p>
<p>What is the impact on the function and purposes of the surrounding Green Belt of removing the site?</p>
<p>If the site is removed from the Green Belt and developed, the surrounding Green Belt would continue to perform the same function and purpose. Removal of the site would not exacerbate any of the above impacts.</p> <p>Removal of the site would result in slithers of Green Belt remaining along the eastern boundary which is likely to impact their Green Belt function and purpose. It is therefore recommended that if the site is taken forward, the eastern boundary is refined to match the existing inner Green Belt boundary in order to avoid any island of Green Belt remaining.</p>
<p>Are there any cumulative impacts (due to release of adjacent sites)?</p>
<p>There is one site under consideration to the north east of the site located to the north east of Goldenhill (BL16). There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.</p>
<p>Conclusion</p>
<p>The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl, as the site is partially enclosed by the large built-up area and development could be considered to round off the settlement pattern.. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.</p> <p>Recommendation: Take site forward for further consideration.</p>
<p>Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?</p>
<p>The new Green Belt boundary would not be defined by recognisable and permanent boundaries except for a small section of Boathorse Road to the south west of the site. The remainder of the</p>

Green Belt Impact Assessment

site's existing outer boundary is less durable consisting of field boundaries and a private track. If the site is taken forward, it is recommended that existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.

C.9 BL9



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside although it contains some existing development including the former Chatterley Whitfield colliery which now includes a heritage centre and business units. The site also includes farm buildings, sparsely located residential properties and hamlets (Bemersley Green and Ridgeway). The site is connected to the large built-up area to the west and south. The boundary between the site (based on the Green Belt within the site) and the large built-up area to the west of the site is undefined and does not follow any features on the ground. The boundary between the large built-up area and the site to the south is less durable consisting of the rear gardens of residential properties. The boundaries between the site and the wider Green Belt to the north and east are predominantly durable consisting of Peck Mill Lane and Bemersley Road with a small section of tree line and rear gardens of residential properties. The boundary to the west consists of a mix of durable and less durable features consisting partly of Whitfield Road and partly undefined by any physical features on the ground. As such, the site has physical features to the north and east that could restrict and contain development. The site is connected to the large built-up area along the site's southern boundary and part of the site's western boundary and new development would not result in an incongruous pattern of development. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in the gap between the Stoke-on-Trent urban area and the town of Biddulph in Staffordshire Moorlands. The site forms part of the gap where there is scope for some development without reducing the visual or perceived separation between the towns given the existing development along the A527 Tunstall Road. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including farm buildings, sparsely located residential properties and hamlets (Bemersley Green and Ridgeway). The former Chatterley Whitfield colliery which now includes a heritage centre and business units is located within the site and is a semi-urban land use. The site has a strong degree of openness with less than 10% built form and open long</p>	Strong contribution

Green Belt Purpose Assessment	Contribution
line views across most of the site although some views in parts are blocked by dense vegetation as well as buildings around the Chatterley Whitfield colliery. The topography of the site is mostly flat and slightly undulating. The site is surrounded by open countryside to the east and north and partly to the west. Overall, the site makes a strong contribution to this purpose.	
Purpose d: To preserve the setting and special character of historic towns	
The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town, and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.	Weak contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.	Moderate contribution
Overall Assessment	
The site makes a strong contribution to one purpose, a moderate contribution to three purposes, and a weak contribution to one purpose. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and there are durable boundaries between the site and the wider Green Belt, which can contain development and prevent it from threatening the overall openness and permanence of the Green Belt.	Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?

Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment

What is the impact on Green Belt function and purposes of removing the site from the Green Belt?

Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as development would be contained by durable boundaries to the east and north.

Purpose b – Development of the site would slightly reduce the gap between the Stoke-on-Trent urban area and Biddulph (in neighbouring Staffordshire Moorlands). Due to the size of the gap, this would represent a small decrease in the separation of the towns, and it would not result in them merging.

Purpose c – Development of the site would entail a modest incursion into partly undeveloped countryside relative to the size of the Stoke-on-Trent urban area. The site includes existing development consisting of the former Whitfield Colliery.

Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?

If the site is removed from the Green Belt and developed, the surrounding Green Belt to the west of the site would become enclosed by development and disconnected from the wider Green Belt which is likely to impact its Green Belt function and purpose.

Are there any cumulative impacts (due to release of adjacent sites)?

There are two sites under consideration to the south east of the site located to the north and south of Norton Green (BL7 and BL10). There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.

Conclusion

The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl, as development would be contained by durable boundaries to the east and north. Development of the site would entail a small incursion into predominantly undeveloped countryside relative to

Green Belt Impact Assessment

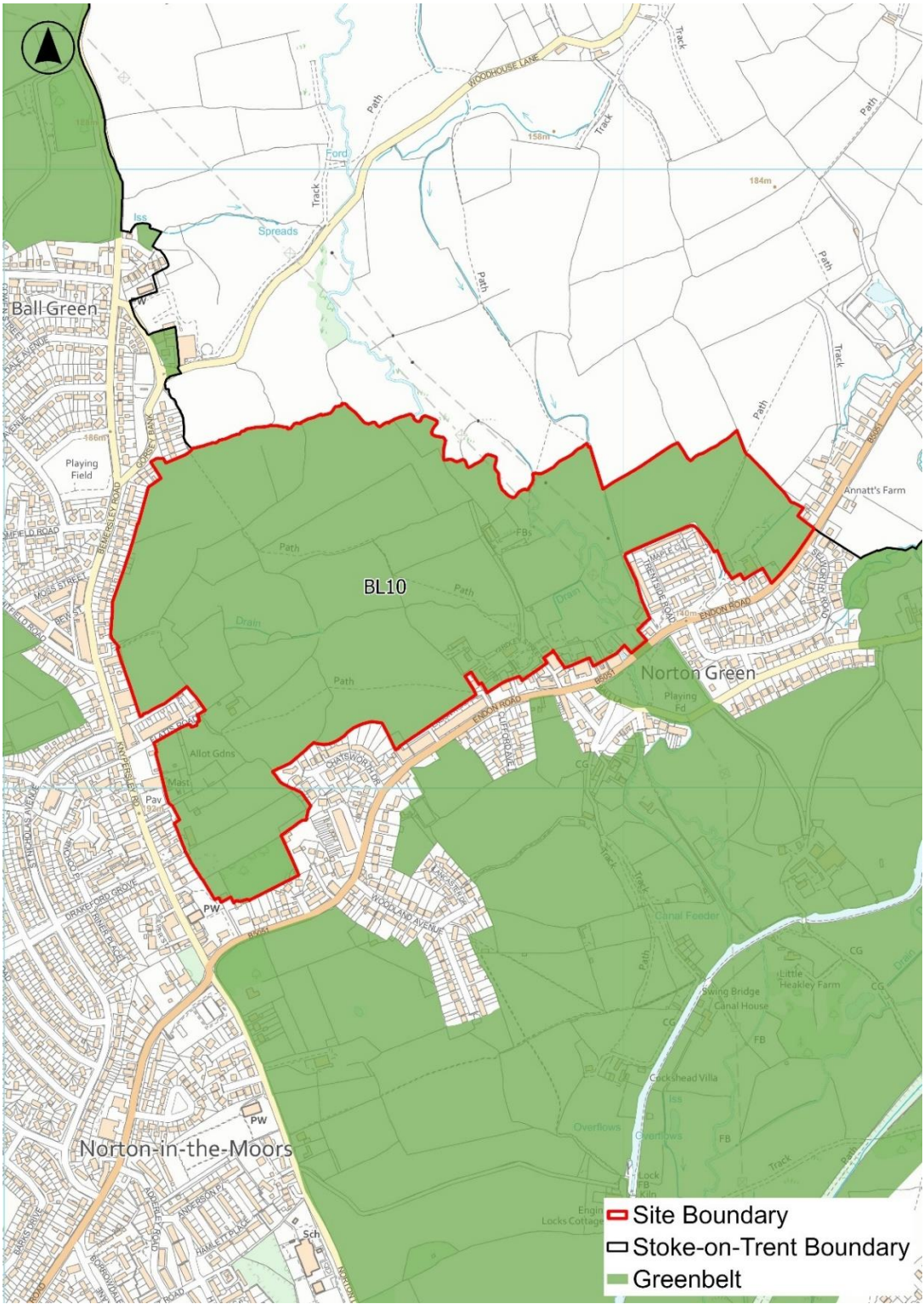
the size of the Stoke-on-Trent urban area. Removal of the site from the Green Belt is likely to have localised impacts on the surrounding Green Belt to the west. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

Recommendation: Take site forward for further consideration.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

The new Green Belt boundary would consist of recognisable and permanent boundaries including Peck Mill Lane to the north and Bemersley Road to the east. The remainder of the site's existing boundary with the wider Green Belt to the north west consists of tree line which is less durable and to the west it is less durable consisting partly of Whitfield Road and partly undefined by any physical features on the ground. If the site is taken forward, it is recommended that new durable boundaries are created, and existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.

C.10 BL10



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside although with some existing development including residential properties, farm buildings, and pylons. The boundaries between the site and the large built-up area are less durable consisting of rear gardens of residential properties to the west and south with a small section of B5051 Endon Road to the south. The boundaries between the site and the wider Green Belt to the north and east are less durable consisting of field boundaries. There are no other durable boundaries in reasonable proximity. As such, the site lacks physical features that could restrict and contain development. The western section of the site is partially enclosed by the large built-up area along the western and southern boundaries, such that new development would not result in an incongruous pattern of development and could be considered to round off the settlement pattern in this part of the site. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in a gap between the Stoke-on-Trent urban area and Biddulph in neighbouring Staffordshire Moorlands. The site forms a very small part of the gap between the defined towns where development would not have any impact on the visual, physical or perceived separation between the towns. Overall, the site makes a weak contribution to this purpose.</p>	Weak contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside and consists of rural land uses including farm buildings, and residential properties along the site's southern boundary. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The site's topography slopes down towards the east. The site is partly enclosed by the large built-up area along its western and southern boundaries, and connected to the open countryside along its eastern and northern boundaries. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution
Purpose d: To preserve the setting and special character of historic towns	

Green Belt Purpose Assessment		Contribution
The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.		Weak contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.		Moderate contribution
Overall Assessment		
The site makes a strong contribution to one purpose, a moderate contribution to two purposes, and a weak contribution to two purposes. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution to the Green Belt. The site supports a strong degree of openness and although it has less durable boundaries with both the built up area and the Green Belt, the site is partially enclosed by the large built-up area and could be considered to round off the settlement pattern.		Moderate contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site’s grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?

Green Belt Impact Assessment

Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as the site is partially enclosed by the large built-up area and development could be considered to round off the settlement pattern.

Purpose b – Development of the site would slightly reduce the gap between the Stoke-on-Trent urban area and Biddulph (in neighbouring Staffordshire Moorlands). Due to the size of the gap, this would represent a limited decrease in the separation of the towns, and it would not result in them merging.

Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.

Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?

If the site is removed from the Green Belt and developed, the surrounding Green Belt would continue to perform the same function and purpose. Removal of the site would not exacerbate any of the above impacts.

Are there any cumulative impacts (due to release of adjacent sites)?

There are three sites under consideration to the north west and to the south east of the site, located near Bemersley Green (BL9), to the south of Norton Green (BL7) and to the east of Baddeley Edge (BL11) respectively. There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.

Conclusion

The site makes a moderate overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl, as the site is partially enclosed by the large built-up area and development could be considered to round off the settlement pattern.. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

Recommendation: Take site forward for further consideration.

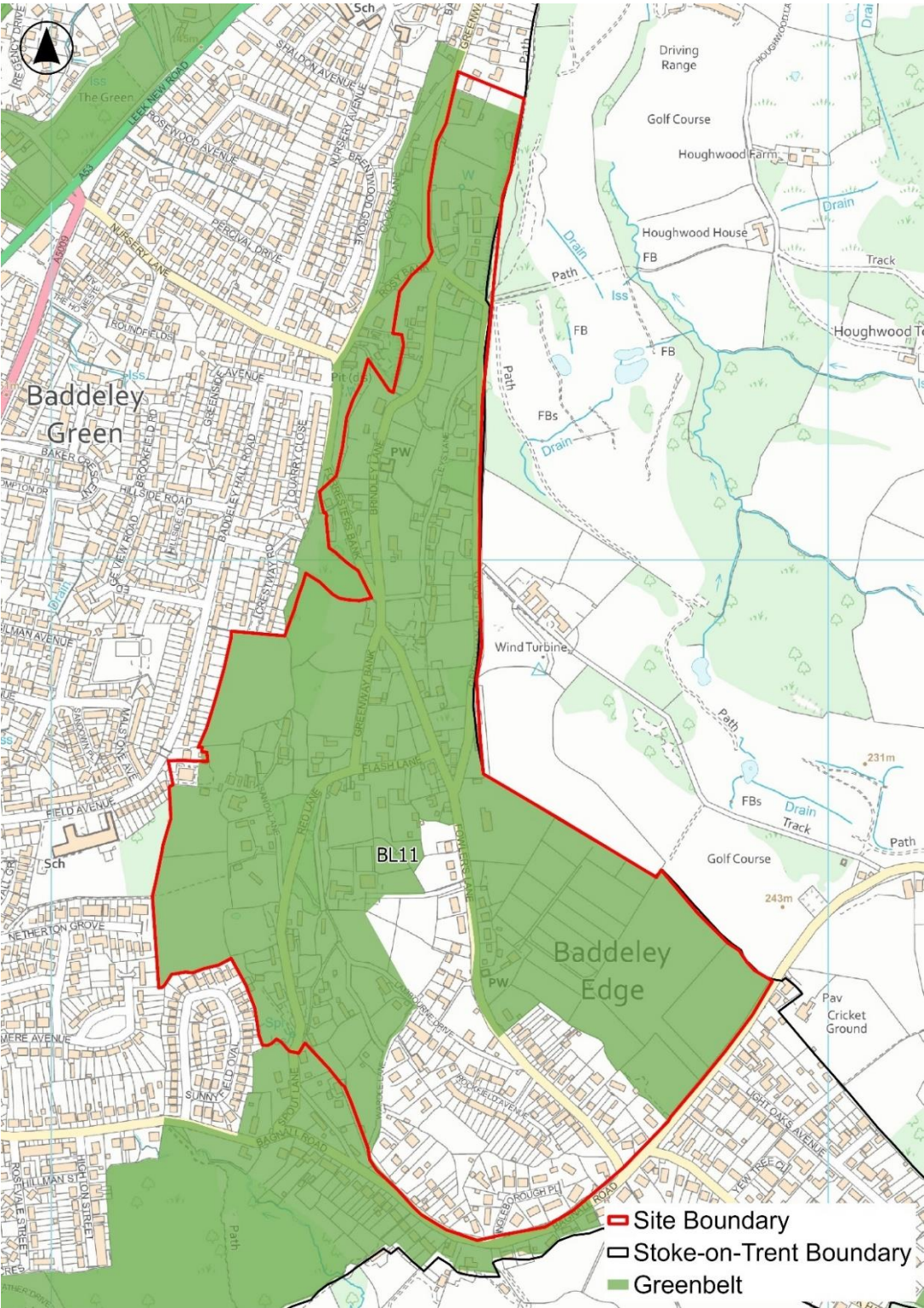
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

The new Green Belt boundary would not be defined by any physical features that are readily recognisable and permanent as the site's existing outer boundaries are less durable consisting

Green Belt Impact Assessment

of field boundaries. If the site is taken forward, it is recommended that existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.

C.11 BL11



Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site contains significant existing development consisting of Baddeley Edge including residential properties, community and commercial properties, and farm buildings. The boundaries between the site and the large built up area to the north, west, and south are mixed but are predominantly less durable consisting of the rear gardens of residential properties and field boundaries, with some short sections of Greenway Hall Road and Cocks Lane. The boundaries between the site and the wider Green Belt are also mixed consisting of Greenway Hall Road to the east with the remaining boundaries being field boundaries or residential development. As such, the site has some physical features that could restrict and contain development. The site is partially enclosed by the large built-up area along its northern, western, and southern boundaries such that new development would not result in an incongruous pattern of development. Overall, given the existing extensive development within the site, the site makes a weak contribution to this purpose.</p>	Weak contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is not located in a gap between neighbouring towns and it makes no contribution to this purpose.</p>	No contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site consists of semi-urban development consisting of Baddeley Edge including residential properties, community and commercial properties, and farm buildings. The site has a weak degree of openness with more than 30% built form and open long line views from certain viewpoints that are not blocked by development, with a low level of vegetation within the site. The site's topography is varied and generally slopes down towards the west. The site is enclosed by both the large built-up area and the inset settlement of Light Oaks which further reduces its sense of openness. Overall, the site makes a weak contribution to this purpose.</p>	Weak contribution
Purpose d: To preserve the setting and special character of historic towns	
<p>The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core.. The site does not form part of the setting of the historic town and it has no visual, physical, or</p>	Weak contribution

Green Belt Purpose Assessment		Contribution
experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.		
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land		
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.		Moderate contribution
Overall Assessment		
The site makes a moderate contribution to one purpose, a weak contribution to three purposes, and no contribution to one purpose. In line with the methodology, the majority contribution should be applied. The site therefore makes a weak overall contribution to the Green Belt.		Weak contribution

Identification of provisional grey belt
Is the site provisional grey belt?
Yes – the site does not strongly contribute to any of purposes a, b or d and is therefore considered to be provisional grey belt. A full assessment against footnote 7 designations is required in order to confirm the site's grey belt status.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?
<p>Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as the site already contains significant levels of development.</p> <p>Purpose b – Development of the site would have no impact on preventing towns from merging as it is not located in a gap between neighbouring towns.</p> <p>Purpose c – Development of the site would not represent encroachment into the countryside as the site already contains significant level of development.</p> <p>Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.</p>

Green Belt Impact Assessment

What is the impact on the function and purposes of the surrounding Green Belt of removing the site?

If the site is removed from the Green Belt and developed, the surrounding Green Belt would continue to perform the same function and purpose. Removal of the site would not exacerbate any of the above impacts.

Removal of the site would also result in slithers of Green Belt remaining to the west of the site which is likely to impact their function and purpose. It is therefore recommended that if the site is taken forward, the boundary is extended to Forresters Bank and Cocks Lane to the west releasing these pockets of Green Belt alongside the site.

Are there any cumulative impacts (due to release of adjacent sites)?

There is one site under consideration to the south west of the site located to the south of Bagnall Road (BL6) and there are two sites under consideration to the north west of the site located to the north and south of Norton Green (BL7 and BL10). There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.

Conclusion

The site makes a weak overall contribution to Green Belt purposes. The site is also considered to be provisional grey belt. Development of the site would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Stoke-on-Trent. Development would not represent unrestricted sprawl or encroachment into the countryside as the site already contains significant levels of development. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.

Recommendation: Take site forward for further consideration.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?

The new Green Belt boundary would be partly defined by Greenway Hall Road to the east, with the remainder of the site's existing outer boundary being less durable consisting of field boundaries. If the site is taken forward, it is recommended that existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.

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Green Belt Purpose Assessment	Contribution
Purpose a: To check the unrestricted sprawl of large built-up areas	
<p>The site is located adjacent to the Stoke-on-Trent urban area. The site is predominantly open countryside with the northern part of the site being the former Goldenhill golf course. The site also contains some existing development including two industrial sites and overhead lines. The boundaries between the site and the large built-up area to the west and south are durable boundaries consisting of Mobberley Road and Kidsgrove Road to the west and Dimmingsdale Close to the south, with the remaining inner boundaries being less durable consisting of private tracks, footpath, trees, and rear gardens of residential properties. The boundaries between the site and the wider Green Belt are less durable consisting of a footpath along the disused railway to the east and tree line and field boundaries to the north. The only other durable boundary in reasonable proximity is Oldcott Drive to the north however this doesn't extend along the full extent of the site. As such, the site has some physical features that could restrict and contain development. The site is partially enclosed by the large built-up area along the site's western, southern, and eastern boundaries, such that new development would not result in an incongruous pattern of development and could be considered to round off the settlement pattern. Overall, the site makes a moderate contribution to this purpose.</p>	Moderate contribution
Purpose b: To prevent neighbouring towns merging into one another	
<p>The site is located in a gap between the Stoke-on-Trent urban area and Kidsgrove in neighbouring Newcastle-under-Lyme. The site forms a substantial part of the gap between the defined towns where development would significantly reduce the perceived and actual separation between the towns, both visually and physically and it would result in them merging.</p>	Strong contribution
Purpose c: To assist in safeguarding the countryside from encroachment	
<p>The site is predominantly open countryside consisting of the former Goldenhill golf course and two industrial developments located on the southern and eastern boundaries respectively, as well as overhead lines. The site has a strong degree of openness with less than 10% built form and open long line views from multiple viewpoints, due to its low level of development and vegetation. The topography is undulating across the site. The site is partly enclosed by the large built-up area along the western, southern, and part of the eastern boundaries. Overall, the site makes a strong contribution to this purpose.</p>	Strong contribution
Purpose d: To preserve the setting and special character of historic towns	

Green Belt Purpose Assessment	Contribution
The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment however it is not located in close proximity to the defined historic core. The site does not form part of the setting of the historic town and it has no visual, physical, or experiential connection to the historic core as it is located a significant distance away from it. Overall, the site makes a weak contribution to this purpose.	Weak contribution
Purpose e: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	
All Green Belt land can be considered to support urban regeneration of settlements within Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall, this site makes a moderate contribution to this purpose.	Moderate contribution
Overall Assessment	
The site makes a strong contribution to two purposes, a moderate contribution to two purposes, and a weak contribution to one purpose. In line with the methodology, the site makes a strong overall contribution to the Green Belt as it makes a strong contribution to purpose b and purpose c.	Strong contribution

Identification of provisional grey belt
Is the site provisional grey belt?
No – the site strongly contributes to purpose b and is therefore not considered to be provisional grey belt.

Green Belt Impact Assessment
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?
<p>Purpose a – Whilst entailing growth of the large built-up area, development of the site would not represent unrestricted sprawl as the site is partially enclosed by the large built-up area and new development could be considered to round off the settlement pattern.</p> <p>Purpose b – Development of the site would significantly reduce the gap between the Stoke-on-Trent urban area and Kidsgrove (in neighbouring Newcastle-under-Lyme) and it would result in the neighbouring towns merging.</p> <p>Purpose c – Development of the site would entail a small incursion into predominantly undeveloped countryside relative to the size of the Stoke-on-Trent urban area.</p>

Green Belt Impact Assessment
<p>Purpose d – The site is adjacent to the Stoke-on-Trent urban area which is defined as a historic town for the purposes of this assessment. Therefore, development would not impact upon the setting or character of a historic town.</p>
<p>What is the impact on the function and purposes of the surrounding Green Belt of removing the site?</p>
<p>If the site is removed from the Green Belt and developed, the surrounding Green Belt to the east and north of the site would become enclosed by development which is likely to reduce the sense of openness in this remaining area of Green Belt.</p> <p>Removal of the site would result in slithers of Green Belt remaining along the site's inner Green Belt boundary which is likely to impact their function and purpose. It is therefore recommended that if the site is taken forward, the boundary is refined to match Mobberley Road and Kidsgrove Road, and Oldcott Drive to the west to release these pockets of Green Belt alongside the site.</p>
<p>Are there any cumulative impacts (due to release of adjacent sites)?</p>
<p>There is one site under consideration to the south west of the site located to the south of Goldenhill (Site 17). There would be no cumulative impacts resulting from the combined release of these sites with the exception of there being a greater incursion into the Green Belt.</p>
<p>Conclusion</p>
<p>The site makes a strong overall contribution to Green Belt purposes. The site is not considered to be provisional grey belt. Development of the site would significantly reduce the gap between the Stoke-on-Trent urban area and Kidsgrove (in neighbouring Newcastle-under-Lyme) and it would result in the neighbouring towns merging. Removal of the site from the Green Belt will therefore harm the overall function and integrity of the Green Belt in this location.</p> <p>Recommendation: Exclude site from process.</p>
<p>Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?</p>
<p>The new Green Belt boundary would not be defined by any physical features that are readily recognisable and permanent as the site's existing outer boundaries are less durable consisting of footpaths and trees. If the site is taken forward, it is recommended that existing boundaries are strengthened to create a recognisable and permanent Green Belt boundary.</p>

Appendix D

Approach to exceptional circumstances taken by other local authorities

Local Authority	Detailed Review of Approach to Exceptional Circumstances
<p>Broxbourne Borough Council Local Plan (June 2020)</p>	<p>The Local Plan was examined against the 2012 NPPF.</p> <p>The Council’s Exceptional Circumstances Case is set out in their Green Belt Topic Paper (June 2017).³⁷ The principles set out in the Calverton judgement are used by the Council as the basis for their exceptional circumstances case. Each principle is considered and evidenced in turn.</p> <p><i>“i) the acuteness/intensity of the objectively assessed need;</i></p> <p><i>ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;</i></p> <p><i>iii) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;</i></p> <p><i>iv) the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and</i></p> <p><i>v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”</i></p> <p>The Local Plan Inspector’s Report³⁸ at paragraph 31 and 32 states:</p> <p><i>“31. A highly significant influence on the Plan, and my main issues, is the fact that virtually all of the undeveloped land in the Borough is designated as Green Belt in the existing local plan adopted in 2005. Whilst the preparation of a new local plan provides the opportunity to review Green Belt boundaries in order to accommodate development that is needed, it is necessary for exceptional circumstances to be demonstrated. My consideration of whether there are exceptional circumstances reflects the approach set out in the “Calverton” High Court judgment, and my main issues are defined accordingly.</i></p> <p><i>32. National policy is clear that the planning system should be genuinely plan-led, and that plans should be kept up-to-date and provide a practical framework within which decisions on planning applications can be made with a high degree of certainty. In this context, and because the current local plan was adopted about 15 years ago and only looked ahead to 2011, it is of great importance that a new local plan is adopted for the Borough as soon as possible. This is particularly so in Broxbourne because of the constraints and uncertainties that would otherwise exist due to highly restrictive Green Belt policies that would continue to apply to much of the land in the Borough. This has been an important consideration for me throughout</i></p>

³⁷ [Green Belt Topic Paper document link](#)

³⁸ [Broxbourne Local Plan Inspector’s Report document link](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<p><i>the examination, including in terms of my assessment of the main issues and my decisions about the main modifications that I recommend in order to ensure that the Plan is sound.”</i></p> <p>The Inspector considers the exceptional circumstances case at paragraph 77-123 of the Inspector’s Report based on the Calverton principles. In relation to the acuteness of the needs for different types of development, and the capacity of non-Green Belt land in the Borough to accommodate the identified needs for economic and housing development, paragraph 86-89 concludes:</p> <p><i>“86. I have found that the Plan is based on reasonable estimates of the need for additional floorspace for convenience goods and leisure uses, but that the need for comparison goods should be reduced. Based on the available evidence, those needs are real and should be met in accordance with national policy. Furthermore, accommodating that need largely at Brookfield in a way that integrates with the significant amount of existing retail floorspace there offers the potential to create a new town centre. I consider the approach to this elsewhere in this report, but suffice to say at this stage that significant weight can be given to meeting the need for main town centre uses that I have identified in that manner.</i></p> <p><i>87. In preparing the Plan, the Council looked for development opportunities in non Green Belt locations. It concluded that intensification of the existing residential areas would adversely impact on the suburban character of much of the Borough; the nature and location of town centres and railway stations limit the scope for significant additional development at those locations; and there is very little vacant land at existing employment sites.</i></p> <p><i>88. There is limited evidence of systematic analysis of the potential for, and consequences of, comprehensive or widespread intensification of existing residential and industrial areas during the preparation of the Plan. However, the economic viability of such an approach would be problematic, and it would be highly unlikely to be effective in meeting any significant proportion of identified needs for housing, industry and warehousing development during the plan period.</i></p> <p><i>89. In that context, the Council’s evidence about the urban capacity of the Borough is proportionate. All specific available opportunities for further significant development in non Green Belt locations are proposed in the Plan including Cheshunt Lakeside (policy CH1), Waltham Cross town centre (policy WC2), and Park Plaza north and south (policies PP2 and PP3), and there a number of policies that are aimed at securing longer term regeneration including at Waltham Cross (policy WC3), Macers Estate (policy WT2) and elsewhere. Furthermore, for the reasons set out elsewhere in this report, subject to main modifications the Plan makes a justified assumption about future windfall development (70 dwellings per year) within urban areas and contains a policy to optimise the use of urban land.”</i></p> <p>At paragraph 94-116, the Inspector then considers the Green Belt harm resulting from each of the proposed sites and whether each site would contribute to sustainable patterns of development.</p>

Local Authority	Detailed Review of Approach to Exceptional Circumstances
Cheshire East Council Site Allocations Development Plan Document (SADPD) (December 2022)	<p>The SADPD was examined against the NPPF (July 2021).</p> <p>The adopted SADPD³⁹ did not propose to alter Green Belt boundaries to accommodate development in the plan period although it included safeguarded land (see Appendix A). The SADPD Policy PG 8 notes that housing development in the Local Service Centres (LSCs) will be addressed by windfall development. Although exceptional circumstances had previously been established in the adopted Local Plan Strategy (LPS) (2017), the Council decided that the release of Green Belt land was no longer required in the LSCs.</p> <p>The Local Plan Inspector's Report⁴⁰ considers this at paragraph 62:</p> <p><i>"Although exceptional circumstances for the alteration of Green Belt boundaries in north Cheshire were established in the LPS, given the growth in the housing land supply since the LPS was adopted, it is necessary to determine whether those exceptional circumstances remain to justify further alterations to the Green Belt boundaries at the LSCs through the SADPD. Before concluding whether exceptional circumstances exist, national policy requires that all other reasonable options for meeting needs must be examined first [paragraph 141 NPPF]."</i></p> <p>Paragraph 63-65 considers the reasonable options:</p> <p><i>"63. Based on the housing monitoring figures to March 2020, it is evident that supply has come forward from windfall sites, which already goes some way to meeting the needs of the LSCs in the north of the Borough³². It is true that a greater share of that supply has been completed or permitted in the LSCs outside of the NCGB (67.9%), with 32.1% at the LSCs within the NCGB³³. However, this is consistent with the Non Green Belt/Green Belt split for the Principal Towns and Key Service Centres (KSCs) established in Policy PG 734, on the basis of which the LPS was found sound.</i></p> <p><i>64. The evidence of windfall permissions since the LPS was adopted and of sites considered in the Settlement Reports, suggests that there is scope for further housing provision to come forward to meet the needs of the LSCs in the NCGB up to 2030, without the need to alter Green Belt boundaries. This includes Mobberley, at which a very limited amount of housing has been delivered since the beginning of the plan period. However, site MOB 1, which is located within the settlement boundary of Mobberley, is likely to be capable of being brought forward as a windfall site for a mix of uses including housing, through the</i></p>

³⁹ [Site Allocations DPD document link](#)

⁴⁰ [Cheshire East Local Plan Inspector's Report document link](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<p><i>development management process, subject to a design and layout that mitigates aircraft noise in line with the requirements of Policy ENV 13.</i></p> <p><i>65. Therefore, I find that exceptional circumstances do not now exist to justify the further alteration of Green Belt boundaries in the SADPD to ensure the housing needs of the LSCs up to 2030 are met. As such Option 7 is not an appropriate strategy for determining the distribution of housing at the LSCs. On the basis that the remaining part of the indicative housing figure for the LSCs in Policy PG 7 can be addressed through windfalls, without the need to alter Green Belt boundaries or allocate further sites, an Application-led approach to providing for this, as set out in Policy PG 8, is justified as an appropriate strategy for the LSCs.”</i></p>
<p>Durham County Council</p> <p>Local Plan (October 2020)</p>	<p>The Local Plan was examined against the NPPF published in February 2019.</p> <p>The adopted Local Plan⁴¹ at paragraph 4.93 summarises the exceptional circumstances case, as follows:</p> <p><i>“We attach great importance to the Green Belt. However, and as required by the National Planning Policy Framework (NPPF) we believe there are exceptional circumstances which justify the removal of some land from the Green Belt. The NPPF is clear that when alterations to the Green Belt are being contemplated that the need to promote sustainable patterns of development should be taken into account. The exceptional circumstances are set out in the Exceptional Circumstances document and whilst both Sniperley Park and Sherburn Road perform strongly against some of the Green Belt purposes, on balance the benefits clearly outweigh the harm to the Green Belt and in summary are as follows.</i></p> <ul style="list-style-type: none"> <i>• Ensuring sustainable patterns of development are achieved by building on Durham City's position as the county's employment centre, regional transport hub and regional centre for services and facilities, such as secondary schools and health facilities. This would provide greater opportunities to achieve locational sustainability and secure social, economic and environmental improvements compared to a more dispersed housing distribution;</i> <i>• Maximising the number of journeys undertaken by sustainable means such as walking, cycling and public transport and minimising overall journey distances and times. This will help address congestion and associated issues such as air quality and carbon emissions and enable the creation of a more sustainable transport network across the city;</i>

⁴¹ [County Durham Plan webpage](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<ul style="list-style-type: none"> • <i>Providing the right type of housing to meet the needs and aspirations of existing and future residents and a housing stock which supports the economy of the county and the need for more and better jobs;</i> • <i>Helping address economic under-performance across the county by supporting the economic potential of Durham City and the delivery of Aykley Heads by capturing business and investment growth, retaining graduates and creating opportunities to increase and retain spending in the city, supporting an improved retail offer and reducing the impact of the fluctuation in population between University terms; and</i> • <i>Maximising the delivery of affordable housing and other infrastructure by locating development in the highest viability areas around Durham City.”</i> <p>The Council prepared a detailed Exceptional Circumstances report (2019)⁴² which considers all of the elements which form the exceptional circumstances. The report considers the local Green Belt context and road infrastructure within the Green Belt. It considers the housing site methodology and describes how the Council has made effective use of brownfield sites and underused land, has considered the density of development and has considered exporting need to neighbouring authorities. The report also considers other non-Green Belt land including towns and villages inset within the Green Belt and locations beyond the outer Green Belt boundary. The findings of the Green Belt assessments are also described as well as compensatory improvements.</p> <p>At the Local Plan Examination hearing session on Green Belt matters held in October 2019, the Inspector followed paragraph 137 of the 2019 NPPF requiring the Council to justify that they had made as much use as possible of suitable brownfield sites and underutilised land, optimised the density of development, and had discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. The Inspector particularly questioned the Council on their approach to considering options for locating growth in the towns and villages beyond the Durham City Green Belt and why they had concluded that this dispersed approach to development was not deemed to be sustainable. The Council had produced various evidence base documents including a Settlement Study and had assessed these options through a SHLAA criteria assessment, a high-level viability study and a sustainability appraisal. In relation to optimising density, the Inspector questioned whether the Council’s proposed 30dph minimum was sufficiently ambitious to get the most out of the Local Plan</p>

⁴² [Exceptional Circumstances Report document link](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<p>allocations. The Council explained that they had explored 40dph and directed the Inspector as to where they had evidenced this.</p> <p>The Local Plan Inspector's Report⁴³ at paragraph 53-78 considers the strategic level exceptional circumstances and then goes out to consider the site-specific exceptional circumstances (at paragraph 79-104) which justify removing the proposed allocations from the Green Belt. Paragraph 70-76 states:</p> <p><i>"70. The inner boundary of the Green Belt around the city is tightly defined. All options for housing development on brownfield land and other potentially suitable land within the city were assessed during the preparation of the Plan. Three sites within the city are allocated for a total of 90 dwellings, and a number of sites are allocated for purpose built student accommodation to help meet identified needs and reduce the pressure to convert family homes to houses in multiple occupation. There are no other suitable and available sites in the city.</i></p> <p><i>71. There are a limited number of small villages not far from the city that are inset from the Green Belt. Other than a limited number of minor infill sites, no opportunities were identified by the Council or others during the preparation of the Plan.</i></p> <p><i>72. Fifteen broad locations on the outer edge of the city of Durham Green Belt, all related to existing villages, were assessed. However, there has been a considerable amount of housing development in these locations in recent years, and few suitable and viable sites for additional housing development were identified. Moreover, further housing development in such locations would be some distance from the city, with relatively limited local services available meaning that future residents would be likely to use private motor vehicles for most trips.</i></p> <p><i>73. The capacity of all allocated sites assumed in the Plan is based on 30 dwellings per hectare of net developable area. This represents a somewhat cautious approach, as policy 30 requires development to achieve at least this density in locations with good access to facilities and frequent public transport services. I consider later in this report whether that particular policy requirement is justified. However, even if higher densities were achieved on all allocated sites, there would still be a need for a significant amount of development on sites that are currently in the city of Durham Green Belt if the sustainable pattern of development proposed in the Plan is to be achieved.</i></p> <p><i>74. I deal with policy 6, which relates to development on unallocated sites, later in this report. Suffice to say at this stage that, subject to the main modifications that I recommend, policy 6 should be effective in encouraging sustainable development on</i></p>

⁴³ [County Durham Plan Inspector's Report document link](#)

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	<p><i>unallocated sites in or well related to all of the 200 or so settlements in the county that are not restricted by Green Belt or policies in a neighbourhood plan.</i></p> <p><i>75. I am, therefore, satisfied that the removal of land from the city of Durham Green Belt is, in principle, justified in order to provide market and affordable homes where they are needed and to minimise the number and length of commuting trips into the city in accordance with an appropriate strategy for accommodating development across the county in ways that achieve sustainable patterns of development.</i></p> <p><i>76. Notwithstanding that conclusion, whether there are exceptional circumstances for releasing the three sites for housing development from the Green Belt as proposed in the Plan depends also on consideration of a number of specific issues in relation to each. I will consider that as part of the next main issue in this report.”</i></p>
<p>Guildford Borough Council</p> <p>Local Plan: Strategy and Sites (April 2019)</p>	<p>The Local Plan was examined against the 2012 NPPF.</p> <p>The adopted Local Plan⁴⁴ in the supporting text to the Green Belt policy (P2: Green Belt) at paragraph 4.3.17 states: “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”</p> <p>The Local Plan Inspector’s Report⁴⁵ comments on exceptional circumstances at paragraph 79-89 under the headings of the need for housing, business needs, land availability in the urban areas, and whether the quantity of development should be restricted having regard to Footnote 9 of the NPPF:</p> <p><i>“78. The submitted Plan alters Green Belt boundaries to accommodate development around the Guildford urban area, at certain villages and at the former Wisley airfield. It also proposes new Green Belt between Ash Green village and the Ash and Tongham urban area. Exceptional circumstances are required to alter Green Belt boundaries. The issue brings up several important considerations, as follows.</i></p> <p><i>The need for housing</i></p> <p><i>79. This has already been discussed under Issues 1 and 2. Guildford has a pressing housing need, severe and deteriorating housing affordability and a very serious shortfall in the provision of affordable homes. There is additional unmet housing need</i></p>

⁴⁴ [Guildford Local Plan webpage](#)

⁴⁵ [Guildford Local Plan Inspector’s Report](#)

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	<p><i>from Woking. There is no scope to export Guildford's housing need to another district; the neighbouring authorities in the housing market area are significantly constrained in terms of Green Belt and other designations and both have their own significant development needs. The overall level of provision will address serious and deteriorating housing affordability and will provide more affordable homes. The headroom can also accommodate the likely residual level of unmet need from Woking.</i></p> <p><i>Business needs</i></p> <p><i>80. The NPPF states that the planning system should do everything it can to support sustainable economic growth and should plan proactively to meet the development needs of business. The land available for additional business development in Guildford town centre and the urban area is very limited. It is unrealistic to suppose that much extra capacity can be gained on existing sites, such as the existing Surrey Research Park, which has an environment specifically designed for particular kinds of business and where any rationalisation of space, such as parking, would be carried out for internal operational reasons. The ability to meet the identified business needs therefore depends on making suitable new land available and there is no realistic alternative to releasing land from the Green Belt. Exceptional circumstances therefore arise at the strategic level to alter Green Belt boundaries to accommodate business and employment needs.</i></p> <p><i>Land availability in the urban areas</i></p> <p><i>81. It is not possible to rely on increasing the supply of housing within the urban areas to obviate alterations to the Green Belt boundary. Development opportunities within the urban areas have been thoroughly investigated. All available sites have been assessed for their suitability as part of the Land Availability Assessment process which considered approximately 1,000 sites. In accordance with the NPPF, the Plan relies only on sites that are either deliverable or developable, which means that about 30 sites have been discounted within Guildford town centre and 90 within the urban area. In Guildford town centre there are constraints that influence its capacity to accommodate more homes, including conservation and flood risk issues. The issue of flood risk is dealt with later.</i></p> <p><i>82. Although further sites have been identified in other documents such as the Town Centre Masterplan, and in work undertaken by the Guildford Vision Group, they cannot be relied upon to deliver homes or meet business needs within the plan period and it would therefore be unsound to assume that they can contribute towards meeting the Plan's housing requirement. Woodbridge Meadows contains existing businesses and is not deliverable for housing during the plan period. Any space at the University is likely to be retained for its own needs. Some town centre sites may have greater capacity than that anticipated by</i></p>

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	<p><i>the Plan; the additional potential at Guildford Station has already been recognised, and there may be opportunities for more housing at Walnut Tree Close and the North Street redevelopment. But any extra yield from these sites would fall a long way short of making the scale of contribution towards meeting overall development needs that would enable the allocated sites in the Green Belt to be taken out of the Plan.</i></p> <p><i>Whether the quantity of development should be restricted having regard to Footnote 9 of the NPPF</i></p> <p><i>86. Subject to the proposed Green Belt alterations, the Plan is capable of meeting objectively assessed needs with adequate flexibility. The alterations to the Green Belt boundary would have relatively limited impacts on openness as discussed in Issues 10 and 11, and would not cause severe or widespread harm to the purposes of the Green Belt. The allocations at A25 Gosden Hill Farm and A26 Blackwell Farm would be planned urban extensions rather than sprawl. Site A25 together with the allocations at Send and Burnt Common/Send Marsh would be visually and physically separate, as discussed in Issue 7 and would not add to sprawl or coalescence. A35 Former Wisley airfield would include a substantial amount of previously developed land and is separate in character from its wider Green Belt surroundings. The other Green Belt sites would be adjacent to settlements and would have very localised effects on openness. There is therefore no justification for applying a restriction on the quantity of development. Considerations in respect of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Thames Basin Heaths Special Protection Area (SPA) do not alter this conclusion: see issue 7.</i></p> <p><i>...Conclusion</i></p> <p><i>89. In conclusion, all the above points amount to strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term planning of the Borough. Local level exceptional circumstances are considered in Issues 10 and 11.”</i></p> <p>The Council’s evidence base included a Green Belt and Countryside Topic Paper (2017)⁴⁶ and a Green Belt and Countryside Study (volumes I-VI). The Topic Paper at paragraph 4.87-4.89 considers the exceptional circumstances.</p>

⁴⁶ [Green Belt and Countryside Topic Paper document link](#)

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<p>Runnymede Council Local Plan (July 2020)</p>	<p>The Local Plan was examined against the 2012 NPPF.</p> <p>The adopted Local Plan⁴⁷ at paragraph 5.10 summarises the exceptional circumstances case:</p> <p><i>“The Council’s Exceptional Circumstances paper (January 2018 with April 2018 addendum) sets out the compelling reasons to return a number of Green Belt sites to the urban area through the Local Plan. These reasons primarily focus on the lack of suitable, available and achievable sites in the existing urban area, the significant level of constraints to development which exist in the Borough, the significant housing needs faced by Runnymede over the Local Plan period and the conclusion from DtC discussions carried out with partners to date which demonstrate that any unmet housing need from Runnymede is unlikely to be met in neighbouring or nearby Local Authority areas, at least in the early years of the plan period.”</i></p> <p>The Local Plan Inspector’s Report⁴⁸ at paragraph 42-54 comments on exceptional circumstances. It refers to the revised NPPF 2019 and the reasonable options test although notes that this was published after the submission the Plan:</p> <p><i>“42. NPPF makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a local plan. It does not define what might constitute an exceptional circumstance but the Housing White Paper (February 2017) stated that all other reasonable options for meeting identified needs should first be fully explored and it gave examples of these. The revised NPPF 2019 incorporated the White Paper’s proposals in this regard, although this post-dated the submission of the Plan.</i></p> <p><i>43. Taking the material considerations and relevant case law into account, the Council has assessed all other reasonable options for meeting identified needs, working with neighbouring authorities in this process. It has provided robust, credible evidence demonstrating that brownfield opportunities including under used land and buildings, estates regeneration, optimisation of densities, and use of surplus public sector land are being pursued actively, continuously and effectively. This includes direct intervention through the acquisition and development of brownfield land in the town centres, recently implemented town centre regeneration schemes, and the proposed allocations and Opportunity Areas in the Plan.</i></p> <p><i>44. It is on this basis that the Council reached a view that there are 5 key factors that amount to exceptional circumstances to justify amendment of the Green Belt boundary in the Plan. I deal with these in turn below.</i></p>

⁴⁷ [Runnymede Local Plan document link](#)

⁴⁸ [Runnymede Local Plan Inspector’s Report document link](#)

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	<p>45. Firstly, as indicated above, Runnymede is a very heavily constrained borough. Government has identified it in the top 6% of local authorities in England with the highest amount of constraints affecting its land area. Of its total area of 7,803 hectares (ha), 79% is designated as Green Belt. Also, the River Thames and other watercourses and lakes are key features of the borough, and flood risk is a significant factor, with 29% of the borough and 35% of its urban areas lying within flood zones 2, 3a or 3b.</p> <p>46. In addition, most of the borough lies within the 400m-5km protection zone for the Thames Basin Heaths Special Protection Area (TBH SPA), a small area is within the 400m zone, and the wider 5km -7 km zone for larger developments covers all but the smallest extremities of the borough. The requirement for Suitable Alternative Natural Green Space (SANG) to be provided in mitigation of the impact of new housing development within the 400m–5km zone is a significant factor that affects the borough’s developable area.</p> <p>47. Lands within Windsor Forest and Great Park Special Area of Conservation also lie within the borough and, in total, it has about 1,000ha that are covered by nature conservation designations. In addition, there are large swathes of land that are designated as open space, best and most versatile agricultural land, or minerals or waste sites. Taking all of this into account, it is estimated that only 1,156ha of the borough’s urban area is suitable for development and that it could accommodate only about 2,100 new homes.</p> <p>48. Secondly, as concluded above, there is an identified need for 500 dwellings per year in the borough during the Plan period. Over the period 2008/2009- 2017/2018, an annual average of only 243 dwellings has been delivered. Based on the 2018 Strategic Land Availability Assessment, the annual delivery rate of homes within the existing urban area is likely to decrease to about 161, amounting to only 32% of the identified need. In addition, there is a significant requirement for pitches and plots to accommodate the needs of Gypsies and Travellers and Travelling Showpeople (see Issue 6). In summary, there is a pressing need to identify suitable land to house the borough’s residents, together with employment and community facilities.</p> <p>49. Thirdly, the detailed boundary of the Green Belt was established in 1986. Since then, development has rendered some parts of the boundary illogical or indefensible, and discrepancies have come to light that need to be corrected. Furthermore, national planning policy on villages that are ‘washed over’ by the Green Belt has altered since 1986, and it is necessary to review whether the policy framework for the borough’s Green Belt villages remains sound.</p> <p>50. Fourthly, a specific need has been identified for expansion of St Peter’s Hospital, Chertsey, to cater for the increased population in its catchment area. The complex is defined as a Major Developed Site in the extant local plan. Also, a case for releasing part of the site from the Green Belt for residential development in order to fund improvements to the hospital has been made out, and therefore it is necessary to review the Green Belt boundary here.</p>

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	<p><i>51. Fifthly, as referred to earlier, neighbouring authorities are unable to help address the unmet needs of Runnymede.</i></p> <p><i>52. NPPF states that in reviewing Green Belt boundaries, consideration should be given to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The Plan has a relatively short time horizon and it does not safeguard land for future development needs in the longer term.</i></p> <p><i>53. Nonetheless, in the light of all the factors affecting Runnymede, I consider the longer-term needs can best be addressed by a Surrey-wide approach, as committed to by the planning authorities. This will enable full account to be taken of the nature of the Green Belt in Runnymede and other districts and its importance in protecting the regional function of the wider Green Belt.</i></p> <p><i>54. Furthermore, Runnymede's Green Belt is part of the first substantial area of open land on the south-western edge of London, and much of it is fragmented in nature. It would not be in the interests of sustainable development of the borough or its surroundings to seek to pre-judge the outcome of a joined-up approach on this fundamentally important spatial policy for the wider area.</i></p> <p><i>55. In conclusion, for the reasons set out above, there is compelling evidence that in principle, exceptional circumstances exist which justify altering the Green Belt boundary in the Plan. In particular, it is justified to seek to meet as much of the housing need as possible, including the needs of Gypsies, Travellers and Travelling Showpeople. The robustness of the Green Belt review and the justification for the specific changes to the boundary that are proposed in the Plan are considered elsewhere in the report."</i></p> <p>The Council produced two papers - one setting out the factors the Council considered as the exceptional circumstances to justify amendments to the Green Belt Boundary; the other provides local level exceptional circumstances for each proposed site allocation. The Exceptional Circumstances Addendum (April 2018)⁴⁹ sets out the local level case for each site. The section on exceptional circumstances uses standard text for each pro forma. It sets the context as constrained nature of borough and inability of other authorities to help meet housing need and, as appropriate, also states the following reasons:</p> <ul style="list-style-type: none"> • Need for housing land to meet OAHN. • Need for land to meet GTT housing need • Need to ensure Green Belt boundary is defensible and logical • Allow for growth of key service facility

⁴⁹ This is no longer available on the Council's website.

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<p>South Oxfordshire Council</p> <p>Local Plan (December 2020)</p>	<p>The Local Plan was examined against the NPPF published in July 2018.</p> <p>The adopted Local Plan designates eight strategic allocations, seven of which are on land to be released from the Green Belt. The Local Plan notes the site-specific exceptional circumstances in the supporting text to the strategic allocations (for example, at paragraph 3.70 and 3.78).</p> <p>The Council's Green Belt evidence consisted of a number of Green Belt assessments. The Council had not prepared a separate exceptional circumstances case or Green Belt Topic Paper however following submission of the Local Plan, the Council prepared a Green Belt Topic Paper (April 2020).⁵⁰ The Green Belt Topic Paper uses the Calverton tests to demonstrate the strategic level exceptional circumstances. The report then considers the local level exceptional circumstances for each of the proposed allocations.</p> <p>The Local Plan Inspector's Report⁵¹ at paragraph 85-90 comments on exceptional circumstances:</p> <p><i>"85. Paragraph 137 of the NPPF says that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the authority should be able to demonstrate that it has examined fully all other reasonable options; paragraph 138 points out that it is necessary to consider the consequences for sustainable development of channelling development towards locations beyond the outer Green Belt boundary.</i></p> <p><i>86. The Council has considered these matters fully. Individually, or in combination, the various non-Green Belt alternatives involving, for example, more growth at the market towns, the villages, Didcot and/or Reading, or indeed a freestanding new settlement beyond the Green Belt, would have significant practical disadvantages over the chosen spatial strategy. They would not address needs where they arise, would be less able to address housing affordability issues, and would result in longer journey patterns, imposing additional journey to work costs on people who may already find housing costs challenging. The opportunities for regeneration that would arise from the Plan's spatial strategy would be lost. A spatial strategy driven principally by the need to avoid Green Belt release would not promote sustainable development and would not meet the Plan's objectives.</i></p> <p><i>87. The strategic allocations and their Green Belt impacts are discussed in more detail in Issue 3. In respect of the five purposes of the Green Belt, the allocations would, by their nature, conflict with the purpose of safeguarding the countryside</i></p>

⁵⁰ [Green Belt Topic Paper document link](#)

⁵¹ [South Oxfordshire Local Plan Inspector's Report document link](#)

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	<p><i>from encroachment. However, as planned urban extensions, the allocations would not amount to unrestricted sprawl; they would not cause neighbouring towns to merge; they would not cause any harm to the setting and special character of Oxford; and they would not impede urban regeneration and would potentially help to regenerate nearby areas. The allocations are of such a size that long term defensible boundaries and structural landscaping and good quality open space can be designed into the schemes' masterplans, such that the impact on the Green Belt can to a degree be mitigated.</i></p> <p><i>88. Having regard to the significant level of housing need discussed in Issue 1, the need to maintain a delivery buffer ("headroom") to ensure the Plan is resilient, discussed in Issues 1 and 4, the range of factors discussed in this Issue, and the more detailed site analysis contained in Issue 3, exceptional circumstances exist for the release from the Green Belt of all the relevant site allocations. These exceptional circumstances extend to meeting employment and social needs as well as housing needs on the strategic allocations in order to achieve balanced, sustainable and well-integrated development.</i></p> <p><i>89. Restricting the size of the Green Belt releases solely to the anticipated built areas would not be appropriate, partly because the boundaries of the built areas are not yet known and will be defined through future masterplans, and partly because such an approach would fail to take into account important related features of the allocation that must be implemented along with the development, including necessary infrastructure, landscaping, buffer zones and mitigation measures.</i></p> <p><i>90. The overall integrity and purpose of the Oxford Green Belt would remain and would be protected by Policy STRAT6. To bring the policy into line with the NPPF, MM9 indicates that the strategic allocations should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, with measures supported by evidence of landscape, biodiversity or recreational needs and opportunities."</i></p>
<p>St Helen's Council</p> <p>Local Plan (July 2022)</p>	<p>The Local Plan was examined against the NPPF (July 2021).</p> <p>The adopted Local Plan⁵² at Policy LPA01 sets out the requirement to release land from the Green Belt to accommodate housing and employment needs. The supporting text at paragraph 4.3.8-4.3.14 describes the strategic level exceptional circumstances case as follows:</p> <p><i>"4.3.8 The Council aims to ensure that the housing and employment needs of St Helens are met in full within the Borough. New development will be guided towards sustainable locations, generally within, on the edge of, or close to Key Settlements (insofar as this is acceptable and practicable). This approach will take account of environmental and infrastructure constraints; the</i></p>

⁵² [St Helens Local Plan document link](#)

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	<p><i>need to maintain an effective Green Belt; settlement size; projected future population growth; past rates of housing delivery in relation to settlement size; and the availability of services and facilities.</i></p> <p><i>4.3.9 The Council will also give continued priority to the development of suitable and available sites within urban areas. However, due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district, some sites on the edges of existing settlements have been removed from the Green Belt by this Plan and allocated for development in the period up to 2037. Some other sites have been removed from the Green Belt but, rather than being allocated for development, have been safeguarded to meet potential longer term development needs after 2037. This will ensure that the changes to the Green Belt endure well beyond 2037, avoiding the need for another Green Belt review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs.</i></p> <p><i>4.3.10 The Council's SHLAA indicates that there is capacity for substantial housing development on urban sites. However, it also established that Green Belt release would be required to help meet identified housing needs over the Plan period. Likewise, there is a significant shortfall in the urban supply of employment land against the identified needs.</i></p> <p><i>4.3.11 In view of the NPPF advice that local authorities work jointly with neighbouring authorities to meet any development requirements that cannot be met within their own boundaries, it should be noted that whilst St Helens shares a housing market area with Halton and Warrington, both have identified shortages of urban land supply for housing. St Helens Borough shares a functional economic market area with Halton, Knowsley, Liverpool, Sefton, West Lancashire, and Wirral, none of which have identified spare capacity for employment development which could help meet the needs of St Helens. Such is the shortage of employment and housing development land in the surrounding areas as a whole that several authorities (Knowsley, Sefton, and West Lancashire Councils) have successfully undertaken local Green Belt reviews to meet their own needs, with further authorities also undertaking them (collectively covering the whole of Greater Manchester, Halton, Warrington, and Wirral). None of these reviews have identified surplus capacity to help meet development needs arising in St Helens.</i></p> <p><i>4.3.12 In addition, there are other reasons why it is not desirable for housing or employment development needs arising in St Helens to be met in other authorities. If a neighbouring authority were able to meet such needs, this would (due to the shortage of urban land supply identified in those areas) be through the release of Green Belt, i.e. the prospective loss of Green Belt in St Helens would simply be replaced by a similar loss of Green Belt elsewhere. This would also lead to a risk that residents would need to move out of the Borough, potentially resulting in the loss of economically active residents within local communities. Such an approach would also be unlikely to guarantee delivery of affordable or special housing needs for residents of St Helens. If demand for new employment was required to be met outside the Borough, it would tend to exacerbate net out-</i></p>

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	<p><i>commuting. This would prejudice the achievement of sustainable patterns of travel and make it more difficult for residents of St Helens, some of whom are likely to be reliant on public transport to access employment.</i></p> <p><i>4.3.13 For all of these reasons, there are considered to be exceptional circumstances at the strategic level to justify the release of Green Belt land to meet identified development needs.</i></p> <p><i>4.3.14 The sites that have been removed from the Green Belt have been selected following a comprehensive Green Belt Review. This has identified sites on the basis of their scope to be developed whilst minimising harm to the overall function of the Green Belt, and their suitability for development in other respects. The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment. Further details of this process are set out in the St Helens Green Belt Review 2018. Small changes have also been made to the boundary of the Green Belt to amend minor anomalies, for example where the original Green Belt boundary no longer follows the edge of the built up area.”</i></p> <p>The supporting text to the housing and employment allocation policies (Policy LPA03, LPA04 and LPA05) at paragraphs 4.9.22, 4.15.23 and 4.21.7 onwards articulate the site specific exceptional circumstances justifying the removal of the allocations from the Green Belt on a site-by-site basis.</p> <p>The Council did not produce a separate exceptional circumstances case document or Green Belt Topic Paper however the evidence base consisted of a Green Belt Review (2018)⁵³ and Developing the Spatial Strategy Background Paper (October 2020).⁵⁴</p> <p>The Local Plan Inspector’s Report⁵⁵ considers the strategic level exceptional circumstances case as part of Issue 1, stating:</p> <p><i>“81. St. Helens is constrained by Green Belt, in that approximately 65% of the Borough is so designated. The remainder of the Borough is urban land. In most areas the Green Belt boundary is tight to the edge of the existing built-up areas of the main</i></p>

⁵³ [Green Belt Review document link](#)

⁵⁴ [Developing the Spatial Strategy Background Paper document link](#)

⁵⁵ [St Helen’s Local Plan Inspector’s Report document link](#)

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	<p><i>towns and villages. The boundaries of the St. Helens Green Belt were drawn up in 1983 and have remained largely unchanged since.</i></p> <p><i>82. Both the UDP and the CS aimed to focus most new development on brownfield land in urban areas. Indeed, the CS set a target for 80% of all new housing development to be delivered on such land between 2003 and 2027. However, the CS also identified a potential need for Green Belt release to meet housing needs from 2022.</i></p> <p><i>83. The 2017 Strategic Housing Land Availability Assessment [SHLAA] shows that there remains substantial capacity for housing on urban sites during the Plan period. As such, a large proportion of the identified housing need can continue to be met on sites in the urban area. Provision will be through a combination of allocations, other sites within the built-up areas of the Borough, and a windfall allowance. However, the evidence base also shows insufficient capacity to meet housing needs in full, because of the quantity, quality, and range of sites. In particular viability issues affect many sites, including brownfield sites subject to contamination.</i></p> <p><i>84. Some sites close to the town centres would be more suited to high-density apartment type developments, but in such cases viability is also challenging. Furthermore, the provision of flats would be at odds with the appropriate type and mix of properties identified as being needed. The SHMA identifies that 2- and 3-bedroom properties should be the focus for new housing development, with demand for family housing and medium sized properties expected to continue during the Plan period.</i></p> <p><i>85. Policy LPA05 encourages high densities (40 dwellings per hectare [dph]) in appropriate locations, such as sites within or adjacent to St. Helens and Earlestown Town Centres. Increasing densities above this could give rise to ‘town cramming’. Using greenfield urban spaces and recreation sites would lead to a change in the character of the existing built environment that would be contrary to the Council’s aim of delivering high quality development. It is too early to ascertain whether changing shopping patterns will increase opportunities for housing in the Borough’s town centres. For these reasons suitable non-Green Belt sites cannot be found to meet all the need. There is a shortfall of over 2000 dwellings in the submitted Plan.</i></p> <p><i>86. As a result the Plan makes allocations on Green Belt land to deliver over 2000 homes during the Plan period, equating to about 27% of the residual requirement for the period 2021 and 2037.</i></p> <p><i>...88. As pointed out earlier neighbouring authorities also have large areas of Green Belt and have similar constraints. The other authorities in the HMA, Halton, and Warrington, have identified a shortfall of urban land supply to meet their own needs. Similarly, none of the authorities in the functional economic area have identified spare urban capacity in order to meet the employment needs of St. Helens. Indeed, many neighbouring authorities have undertaken their own Green Belt reviews to</i></p>

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	<p><i>identify land to release from the Green Belt in order to meet their own housing and employment needs. For these reasons, meeting any unmet need within neighbouring authorities is not a feasible option.</i></p> <p><i>89. The Plan's strategy is dependent on meeting the needs of the Borough close to home. Providing housing and employment on the doorstep would prevent out migration from the Borough, the loss of economically active residents, and outcommuting. The delivery of affordable and special needs housing would be prejudiced if housing need was not met or met elsewhere. Most importantly the Plan would not meet the key objectives of tackling low levels of economic activity and high deprivation.</i></p> <p><i>90. The Plan has sought to strike the right balance between providing homes and jobs and protecting the Green Belt. There is a strong case for meeting the Borough's housing and employment needs in full. Exceptional circumstances exist at a strategic level to justify the Plan's proposals for some Green Belt release. The quantum of housing and employment land proposed for release has been justified. However, the exceptional circumstances have not been fully articulated in the submitted Plan. MM006 provides the justification for the strategy of Green Belt release contained within Policy LPA02 and ensures consistency with national policy. We deal with the particular Green Belt impacts of the allocations later in the report."</i></p> <p>The Inspector's Report then goes on to consider the site-specific exceptional circumstances as part of Issue 3 however at paragraph 131, the Inspector's Report notes that the site specific exceptional circumstances are not sufficiently clear and a main modification was required to provide more detail:</p> <p><i>"131. As explained earlier, exceptional circumstances exist to justify the alteration of Green Belt boundaries at a strategic level. In terms of releasing particular sites from the Green Belt, we set out below our reasoning. However, the Plan itself does not clearly and concisely justify each allocation that will alter Green Belt boundaries. MM007, MM009 and MM011 would secure changes to the justification for Policies LPA04 (employment allocations), LPA05 (housing allocations) and LPA06 (safeguarded land). As a result, a concise explanation is included to explain the reasoning and exceptional circumstances for the removal of sites from the Green Belt, including by reference to the GBR, Green Belt purposes and other site characteristics. These changes are needed so that the Plan is positively prepared, justified, and consistent with national policy."</i></p> <p>The Inspector's Report considers each site in turn concluding that exceptional circumstances have been demonstrated for each of the proposed allocations.</p>
Stevenage Council	The Local Plan was examined against the 2012 NPPF.

Local Authority	Detailed Review of Approach to Exceptional Circumstances
Local Plan (May 2019)	<p>The adopted Local Plan⁵⁶ in the supporting text to the Green Belt policy (Policy SP10: Green Belt) at paragraph 5.127-5.128 states:</p> <p><i>“5.127 There is no definition of 'exceptional circumstances' within the NPPF. However, it has been considered by the Courts. The recent Calverton judgement identifies criteria that should be taken into account when considering whether these circumstances exist. Our overarching approach to Green Belt review and consideration of these criteria is set out in a technical paper . We consider that the future development and regeneration needs of the Borough do provide the 'exceptional circumstances' that are required to alter Green Belt boundaries.</i></p> <p><i>5.128 Our evidence demonstrates that the sites recommended for release will not harm the overall purposes of the Green Belt in this area.”</i></p> <p>The Local Plan Inspector’s Report⁵⁷ at paragraph 75-87 comments on the exceptional circumstances:</p> <p><i>“75. The Plan removes five areas of land from the Green Belt for different types of development, a total of around 90ha. Dealing first with housing sites, these are land to the North of Stevenage (HO3); land to the South East of Stevenage (HO4); and land to the north of Graveley Road for a traveller site (HO12). In terms of sites for other uses, a site for employment use close to Junction 8 of the A1 (EC1/7) would be removed and also an existing garden centre site in the Green Belt is allocated for a major new food store of up to 7,900m² (gross), post-2023 (TC11). A small site at Norton Green is put into the Green Belt.</i></p> <p><i>76. Stevenage is a very small Borough. In places, the town is built right up to the Borough boundary, and to the north-east already spreads across it into the neighbouring North Hertfordshire district. The Green Belt boundary is, with the exception of the west of the A1(M), drawn tightly around the edge of the urban area which is also, for much of its length, the administrative boundary with neighbouring districts. Previous releases from the inner Green Belt boundary have been made to allow for the development of Great Ashby/Burleigh Park and Stevenage West.</i></p> <p><i>77. The Council’s Green Belt review provides an assessment of the extent to which the land around the urban edge of Stevenage still fulfils the five purposes of Green Belt policy, as defined in the NPPF. It then evaluates the sensitivity of the land to any development and/or change and identifies broad areas for potential compensatory Green Belt provision, in the event</i></p>

⁵⁶ [Stevenage Local Plan document link](#)

⁵⁷ [Stevenage Local Plan Inspector’s Report document link](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<p><i>that Green Belt releases are required around Stevenage. Finally it considers these broad areas in more detail as to their potential for release in light of their contribution to Green Belt purposes and recommends sites which could be released from the Green Belt or safeguarded for future development beyond the Plan period.</i></p> <p><i>78. For the reasons I have already set out, accommodating future development needs within Stevenage Borough is far more difficult than in other areas where land is more readily available. It is also the case that because the town is relatively new (built post-war) there are few opportunities for redevelopment, other than on a small scale. Consequently the capacity of Stevenage is extremely limited. Moreover neighbouring authorities are also reviewing their Green Belt boundaries to meet their own needs. Therefore, it would be unlikely that Stevenage's needs could reasonably be met in neighbouring authorities on land outside the Green Belt.</i></p> <p><i>...81. The only way that Stevenage can meet its current identified housing need is to release any suitable land from the Green Belt. Through their extensive and thorough Green Belt review the Council have identified site HO3 (north of Stevenage), in the Plan as being suitable for housing development. In the assessment of defined areas of land against Green Belt purposes this site is considered (as part of a larger parcel of land – N4) to make a limited contribution to Green Belt purposes in all regards, with the exception of preventing merger where it is identified as making a significant contribution.</i></p> <p><i>82. That said this site is only part of the area of land that was categorised in this way and importantly open land would remain beyond HO3 that would maintain separation from the nearest large settlement. I realise that some of this land is identified in North Hertfordshire's emerging Plan as housing land, but that will be examined separately. While that site would join with site HO3, along the border between Stevenage and North Hertfordshire, there is a gap between the allocated site in North Hertfordshire's emerging Plan and the nearest village of Graveley such that it would prevent the coalescence of this village with Stevenage or indeed any other settlement.</i></p> <p><i>83. Part 2 of the Council's Green Belt review identifies site HO3 as parcel N4(iii) and says that "notwithstanding its open aspect, this parcel could be released within the local plan period given its current containment by strong boundaries and opportunities to substantiate these through further landscaping" and I agree.</i></p> <p><i>84. In summary, there is a pressing need for housing within the Borough that cannot be met outside of the Green Belt. The value of the Green Belt has been thoroughly assessed by the Council and although it found that here a significant contribution comes from preventing the merging of settlements, there would still be a gap between settlements, even if the site in North Hertfordshire is allocated in their Plan and subsequently developed. Taking into account all of these factors I find that this site</i></p>

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<p><i>would be the most suitable, along with others, to meet the housing need in Stevenage. As such, exceptional circumstances exist to justify the release of this site from the Green Belt.</i></p> <p><i>85. Turning to consider site HO4 (south east Stevenage), this is part of the large parcel identified as E7 in the Council's Green Belt review. It is identified as making a contribution to Green Belt purposes in all regards, except for the purpose of preserving the setting and special character of historic towns. Part 2 of the review identifies the specific site HO4 as E7(i) and E7(ii). These parcels are described as well contained land that currently helps to contain the south eastern edge of Stevenage, but their release would not damage the overall function of the Green Belt in this location. I concur with this assessment.</i></p> <p><i>86. As set out above the review that has taken place is robust and I agree with the results which indicate that these sites are best placed to accommodate some of the housing identified as being required in Stevenage.</i></p> <p><i>87. Overall, in terms of site HO4, again there is a need for housing that cannot be met outside of the Green Belt. The value of the Green Belt has been thoroughly assessed by the Council, as set out above. So having regard to these matters I find that this site would be the most suitable, along with others, to meet the housing need in Stevenage. As such, exceptional circumstances exist to justify the release of this site from the Green Belt."</i></p> <p>The Council produced a Green Belt Review and a Green Belt Technical Paper (2015)⁵⁸ which sets out the strategic exceptional circumstances case focusing on the Calverton tests:</p> <ul style="list-style-type: none"> • The acuteness/intensity of the need for new homes, employment and retail provision. • The inherent constraints on supply/availability of land prima facie suitable for sustainable development • The consequent difficulties in achieving sustainable development without impinging on the Green Belt • The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed) • The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

⁵⁸ [Green Belt Technical Paper document link](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<p>The specific site releases are examined as part of the section on the nature and extent of harm to the Green Belt. The analysis focuses on impact on the Green Belt purposes and whether resultant Green Belt boundaries will be strong and defensible based on recognisable features.</p>
<p>Warrington Borough Council</p> <p>Local Plan (December 2023)</p>	<p>The Local Plan was examined against the NPPF (July 2021).</p> <p>The adopted Local Plan⁵⁹ in the supporting text at Section 3.4 sets out the exceptional circumstances. Paragraph 3.4.2-7. states: <i>“3.4.2 In accordance with paragraph 141 of the NPPF the Council has examined fully all other reasonable options for meeting Warrington’s identified need for development before concluding that exceptional circumstances exist to justify Green Belt release.</i></p> <p><i>3.4.3 The Local Plan will ensure that as much use as possible is made of suitable brownfield sites and underutilised land.</i></p> <p><i>3.4.4 The Council has carried out a comprehensive review of its SHLAA and Brownfield Register. In doing so the Council has incorporated the Town Centre masterplaning work undertaken by Warrington & Co. This ensures the Council has a single robust assessment of the capacity of the existing urban area, including brownfield sites within the Borough’s outlying settlements and a small number brownfield sites within the Green Belt where the principle of development is established.</i></p> <p><i>...3.4.6 Following previous Local Plan consultations the Council has reviewed its density assumptions for the Town Centre and Inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development in these locations. The Council is proposing minimum density requirements for the Town Centre and other sites that are in highly sustainable locations, together with minimum requirements for all site allocations to minimise the amount of Green Belt release required.</i></p> <p><i>3.4.7 The Council has reconfirmed that no neighbouring authorities are able to meet any of Warrington’s housing development needs. St Helens are making a contribution to meeting Warrington’s employment land needs through the proposed western extension of the existing Omega development. This is demonstrated in the Council’s Statement of Common Ground. It is also apparent that all of Warrington’s neighbouring authorities are having to release Green Belt land themselves to meet their own development needs.”</i></p> <p>Paragraph 3.4.8-10 summarises the exceptional circumstances case as follows:</p>

⁵⁹ [Warrington Local Plan document link](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
	<p><i>“3.4.8 The starting point for Warrington’s Exceptional Circumstances is the requirement to ensure that sufficient land is provided to meet Warrington’s development needs. The Plan’s proposed housing requirement will ensure that issues of affordability are addressed and that that sufficient homes are provided to support the planned level of economic growth, but this can only be achieved with the release of Green Belt.</i></p> <p><i>3.4.9 The Exceptional Circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.</i></p> <p><i>3.4.10 This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.”</i></p> <p>At paragraph 3.4.11, the Council sets out the exceptional circumstances for each of the areas of Green Belt release. Paragraph 5.1.13 notes that in order to assist in amending detailed Green Belt boundaries, a comprehensive Green Belt Assessment had been undertaken.</p> <p>The Council did not prepare a separate exceptional circumstances report or Green Belt Topic Paper however the Development Options and Site Assessment Technical Report (September 2021)⁶⁰ briefly touches on the exceptional circumstances. The Green Belt evidence consisted of a Green Belt Assessments of general areas, parcels and submitted sites and a report considering the implication of Green Belt release which assessed the Green Belt harm.⁶¹</p> <p>The Local Plan Inspector’s Report⁶² at paragraph 114 confirms there are exceptional circumstances in relation to housing:</p> <p><i>“114. Given the scale of need for new housing and the lack of sufficient capacity within the urban area, there are in principle exceptional circumstances on a Borough wide level to alter the Green Belt and allocate sites for housing development.”</i></p> <p>The Inspector considers each of the proposed allocations in turn and the site-specific exceptional circumstances which apply to each.</p>

⁶⁰ [Development Options and Site Assessment Technical Report document link](#)

⁶¹ [Implications of Green Belt Release Report document link](#)

⁶² [Warrington Local Plan Inspector’s Report document link](#)

Local Authority	Detailed Review of Approach to Exceptional Circumstances
<p>Watford Borough Council</p> <p>Local Plan (October 2022)</p>	<p>The Local Plan was examined against the NPPF (July 2021).</p> <p>The adopted Local Plan⁶³ included changes to the Green Belt in five locations however three of these locations were already developed and the Inspector⁶⁴ concluded that due to this, these locations no longer served any Green Belt purpose. Only one of the five locations was a proposed housing allocation. The other location was an extension to an established gypsy and traveller site.</p> <p>There is very limited policy text or supporting text which mentions exceptional circumstances within the Local Plan. Furthermore, the Council did not have a separate topic paper or exceptional circumstances case. The Stage 2 Green Belt Assessment (October 2019)⁶⁵ provides an assessment of the Green Belt and considers the potential harm to the Green Belt.</p>

⁶³ [Watford Local Plan document link](#)

⁶⁴ [Watford Local Plan Inspector's Report document link](#)

⁶⁵ [Stage 2 Green Belt Assessment document link](#)

Appendix E

Approach to safeguarded land taken by other local authorities

Local Authority	Detailed Review of Approach to Safeguarded Land
<p>Barnsley Council</p> <p>Local Plan (January 2019)</p>	<p>The adopted Local Plan⁶⁶ at para 3.11 notes that the Council are proposing safeguarded land (land which can be considered for development after 2033). This will give permanence to the proposed Green Belt boundary until at least 2038.</p> <p><i>Policy GB6 on safeguarded land states: “We will only grant planning permission on sites allocated as safeguarded land for development that is needed for the operation of existing uses, or alternative uses where the development will protect the open nature of the land, and will not affect the potential for future development of the site. The permanent development of safeguarded land will only be permitted following review of the Local Plan which proposes such development.”</i></p> <p>The Council identifies 28 sites which are allocated as safeguarded land in the following locations: Barnsley, Hoyland, Cudworth, Royston, Dearne, Penistone, Wombwell and villages.</p> <p>The Inspector’s Report⁶⁷ at paragraph 112-114 onwards describes the approach:</p> <p><i>“Having regard to the extent of the Green Belt and the boundaries around Urban Barnsley and the Principal Towns which are the more sustainable locations for development, the identification of safeguarded land is appropriate to the circumstances of the plan area and necessary in the terms of the NPPF. The identification of safeguarded land will help to ensure that Green Belt boundaries will remain permanent and will not need to be altered in the long term.</i></p> <p><i>After deducting the supply likely to come forward on windfall sites, the Council’s approach is to identify sufficient safeguarded land to supply 5 years’ worth of the annual housing requirement for delivery after the plan period. In the absence of any national guidance on the amount of safeguarded land that should be identified, this is a pragmatic and reasonable approach.”</i></p> <p><i>In the submitted plan the table accompanying Policy GB6 lists thirty three areas of safeguarded land which are shown on the Policies Map. Twenty five safeguarded areas have been carried forward from the UDP and eight additional areas are proposed to be removed from the Green Belt for safeguarded land – SAF5, SAF6, SAF7, AC33, H79, H85, AC42 and AC41. Through the housing site selection methodology they were found to perform less favourably compared with the allocated sites and/or had deliverability issues which would be unlikely to be resolved within the plan period. The safeguarded sites proposed to be removed from the Green Belt all relate to resultant parcels (or part thereof) within the Green Belt review and for ease of reference I deal with the exceptional circumstances justifying their release at a site level in Issue 5.”</i></p>

⁶⁶ [Barnsley Local Plan document link](#)

⁶⁷ [Barnsley Local Plan Inspector’s Report document link](#)

Local Authority	Detailed Review of Approach to Safeguarded Land
	<p>The Inspector adds:</p> <p><i>“118. Subject to the MMs outlined, I conclude that there is a compelling case in principle for the release of land from the Green Belt to meet the objectively assessed need for employment and housing and for additional safeguarded land. This is, however, subject to exceptional circumstances being demonstrated for the alteration of Green Belt boundaries to justify the removal of specific sites from the Green Belt for development, a matter dealt with in Issue 5. Exceptional circumstances have been demonstrated to add land to the Green Belt. In addition, the Green Belt boundary alterations to rectify anomalies, errors and reflect updated circumstances are appropriate and soundly based.</i></p> <p><i>Conclusion on Issue 5</i></p> <p><i>239. The plan’s site allocations are based on a logical and appropriate set of criteria and assessment methodology, SA and HRA. Subject to the MMs, the employment, mixed use and housing allocations are soundly based. Where necessary, exceptional circumstances have been demonstrated to justify alterations to the Green Belt boundary and the removal of land from the Green Belt to meet the objectively assessed need for employment, housing and identify areas of safeguarded land.”</i></p>
<p>Broxbourne Borough Council Local Plan (June 2020)</p>	<p>The Council does not identify any safeguarded land in its adopted Local Plan.⁶⁸</p> <p>At paragraph 117-119 of the Inspector’s Report⁶⁹, the Inspector considers whether the Green Belt boundaries would need to be altered again in a future review of the Plan. The Inspector concludes:</p> <p><i>117. Based on the evidence before me, it is unlikely that the Green Belt will need to be amended again before 2033 to meet currently identified development needs. However, a new secondary school may be needed in the Borough before 2033. If this is so, it is possible that it may require development on land that is in the Green Belt as currently proposed in the Plan. For the reasons set out later in this report, this would be addressed through a plan-led approach consistent with national policy in accordance with my recommended main modification to policy INF10.</i></p> <p><i>118. There are, of course, considerable uncertainties about what development will be needed in the Borough in the longer term and it would not be appropriate to attempt to quantify that at the present time. In terms of how needs may be met in the longer term, the Plan identifies a number of significant opportunities including in and around Waltham Cross town centre and elsewhere associated with Crossrail 2. In addition, the Council may wish to consider further whether the existing</i></p>

⁶⁸ [Broxbourne Local Plan document link](#)

⁶⁹ [Broxbourne Local Plan Inspector’s Report document link](#)

Local Authority	Detailed Review of Approach to Safeguarded Land
	<p><i>residential and industrial areas in the Borough have greater potential for intensification through redevelopment and infilling.</i></p> <p><i>119. In that context, and because of the importance of getting a local plan for the Borough adopted as soon as possible for the reasons outlined earlier, I am satisfied that appropriate consideration has been given to the objective of ensuring that Green Belt boundaries are capable of enduring beyond the plan period. Certainly, there are not exceptional circumstances to justify taking additional land out of the Green Belt at the present time. Subject to my recommended main modifications, the proposed Green Belt boundaries to the sites that have been removed from the Green Belt are clearly defined and likely to be permanent.</i></p> <p><i>The Council's Green Belt Topic Paper (June 2017)⁷⁰ considers the long-term development needs. Paragraph 6.5 notes that a significant proportion of the borough's long-term development needs beyond 2033 can be met at two urban areas identified in the emerging Local Plan. At paragraph 6.7, the Council conclude: "The Council considers that there is limited scope for Broxbourne to continue to accommodate significant new development in the Green Belt beyond 2031. It is a small Borough with significant growth constraints – the Lee Valley Park to the east, semi-ancient woodland and rural/suburban communities to the west and busy transport routes. On the basis of the work undertaken as part of this Local Plan review, the Council is satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period."</i></p>
<p>Cheshire East Borough Council</p> <p>Local Plan Strategy (July 2017)</p>	<p>The adopted Local Plan Strategy⁷¹ at Policy PG4 (Safeguarded Land) established the amount of safeguarded land required (200ha) and identifies strategic areas of safeguarded land. It notes that the Site Allocations and Development Policies Document may need to identify additional non-strategic areas to be safeguarded.</p> <p>The adopted Site Allocations and Development Policies Document⁷² at Policy PG11 (Green Belt and safeguarded land boundaries) identifies additional areas of non-strategic safeguarded land.</p>

⁷⁰ [Green Belt Topic Paper document link](#)

⁷¹ [Cheshire East Local Plan Strategy document link](#)

⁷² [Cheshire East Site Allocations DPD document link](#)

Local Authority	Detailed Review of Approach to Safeguarded Land
<p>Site Allocations and Development Policies Document (December 2022)</p>	<p>The Safeguarded Land Technical Annex⁷³ describes the approach taken by the Council: Paragraph 6.4-6.7 sets out the Council approach of projecting forward current development needs arising from the northern sub-area (given this is the area which is most constrained by Green Belt). It would not be appropriate to project forward the needs for the Borough as a whole. Paragraph 6.4 notes: <i>“Although the projecting forward of current development needs beyond 2030 is relatively simplistic, it is considered to be the most robust approach. The only alternative would be to try and make a separate estimate of needs for the period 2030-2045. Given the timescales involved, it is considered this would neither be accurate nor realistic.”</i> The Council used the Spatial Distribution Update to identify the housing and employment land requirements for the northern submarket area. Section 7 of the Annex notes the Council’s intention to identify safeguarded land to meet 10 years of future requirements. The Council considers other likely sources of supply beyond the plan period which would mean that when combined with the safeguarded land could accommodate the full 15 years beyond the plan period. As a result of this exercise, the Council concluded that a modest reduction in the 10 year proposed timescales would be reasonable and therefore identified scenarios for 8, 9 and 10 years of safeguarded land. At Section 8 of the Annex, the Council tested different average housing densities (30, 35 and 40dph). In undertaking the safeguarded land calculation, the Council used the identified scenarios and densities to provide a range of parameters for the amount of safeguarded land. This ranged from 155ha to 244ha. At paragraph 9.8, the Council concludes: <i>“It is suggested that overdependence on any single influence is unwise, given the variables involved. Consequently, it is suggested that a midpoint of 200 ha be adopted that takes account of all of the factors concerned.”</i> Paragraph 9.9 notes that this equates to 9 years of safeguarding at an average density of 34 dwellings per hectare.</p> <p>The accompanying evidence document Local Service Centres Safeguarded Land Distribution Report (August 2020)⁷⁴ describes the approach taken to safeguarded land in the Local Plan Strategy and considers options for the spatial distribution of safeguarded land in the Site Allocations document:</p> <p><i>1.8 As described in the LPS evidence base, the total amount of safeguarded land required is based on a projection of development requirements for the northern part of the borough only (taken as the former Macclesfield Borough area) as this is the only part of the borough with Green Belt inset settlements in the top three tiers of the settlement hierarchy (Principal Towns, Key Service Centres (“KSCs”) and LSCs).</i></p>

⁷³ [Safeguarded Land Technical Annex document link](#)

⁷⁴ [Local Service Centres Safeguarded Land Distribution Report document link](#)

Local Authority	Detailed Review of Approach to Safeguarded Land																
	<p><i>1.9 For the South Cheshire Green Belt, all settlements in the top three tiers of the hierarchy are located beyond the Green Belt and already retain significant areas of non-Green Belt land adjacent to their settlement boundaries. Consequently, the distribution of safeguarded land should be to the northern sub-area only (that is within the North Cheshire Green Belt only).</i></p> <p><i>1.10 Appendix 2 of the LPS Site Selection Methodology considers four options for the distribution of safeguarded land to settlements inset within the North Cheshire Green Belt:</i></p> <ol style="list-style-type: none"> <i>1. Provision of all 200 ha in the Principal Town of Macclesfield</i> <i>2. Provision of safeguarded land distributed proportionately by settlement, based on the spatial distribution of development in LPS Policy PG 7</i> <i>3. Provision of safeguarded land distributed proportionately by settlement based on the resident population</i> <i>4. A hybrid approach based on Options 2 and 3 above</i> <p><i>1.11 It concludes that Option 4 is the most appropriate approach. This uses Option 2 as its basis but, so as not to skew the distribution of safeguarded land to Handforth because of the presence of the North Cheshire Growth Village (which not only serves to address Handforth's development needs but also some of the development needs arising across the northern part of the borough), the amount of land to be provided in Handforth is based on the apportionment by current population. The difference between the amount of safeguarded land in Handforth to be provided under Option 2 and Option 3 was then re-distributed to the other Principal Towns and KSCs proportionately. This enables the continuation of sustainable patterns of development set out in the current spatial distribution, but redistributes part of the additional land directed to Handforth under Option 2 so as not to assume that Handforth will continue to assist in meeting development needs of other settlements in future plan periods.</i></p> <p><i>1.12 This results in the spatial distribution shown in Table 1.1.</i></p> <table border="1" data-bbox="461 1106 1167 1305"> <thead> <tr> <th>Settlement</th><th>Safeguarded land distribution (ha)</th></tr> </thead> <tbody> <tr> <td>Macclesfield</td><td>95</td></tr> <tr> <td>Handforth</td><td>10</td></tr> <tr> <td>Knutsford</td><td>28</td></tr> <tr> <td>Poynton</td><td>19</td></tr> <tr> <td>Wilmslow</td><td>24</td></tr> <tr> <td>Local Service Centres</td><td>24</td></tr> <tr> <td>Total</td><td>200</td></tr> </tbody> </table> <p>Table 1.1: Safeguarded land distribution identified in the LPS site selection methodology</p>	Settlement	Safeguarded land distribution (ha)	Macclesfield	95	Handforth	10	Knutsford	28	Poynton	19	Wilmslow	24	Local Service Centres	24	Total	200
Settlement	Safeguarded land distribution (ha)																
Macclesfield	95																
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Local Authority	Detailed Review of Approach to Safeguarded Land
	<p><i>1.13 Safeguarded land has been allocated at Macclesfield and each of the KSCs in the northern part of the Borough in the LPS. This has either met or exceeded the requirement for safeguarded land as shown in Table 1.1 for that individual settlement. There is therefore no need to identify any further safeguarded land in these towns through the SADPD....</i></p> <p><i>1.16 Although the safeguarded land distribution identified in the LPS site selection methodology identified 24 ha to be found in LSCs, the actual LPS allocations at Macclesfield and the KSCs mean that only 13.6 ha of land remains to be identified in the SADPD.</i></p> <p><i>1.17 As set out in the NPPF, the government attaches great importance to Green Belts and once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. It is considered that these exceptional circumstances do not extend to Green Belt release of additional land over and above the 200 ha that has been fixed through the LPS process. Therefore, the remaining amount of safeguarded land to be distributed to the LSCs inset within the North Cheshire Green Belt is 13.6 ha.</i></p> <p><i>1.18 The LSCs inset within the North Cheshire Green Belt are: Alderley Edge; Bollington; Chelford; Disley; Mobberley; and Prestbury. All of the other LSCs (Audlem, Bunbury, Goostrey, Haslington, Holmes Chapel, Shavington and Wrenbury) are located beyond the Green Belt.</i></p> <p><i>1.19 Whilst the distribution of safeguarded land in the LPS was largely based on the spatial distribution of indicative development requirements in this plan period; this may not be the most appropriate approach for the SADPD to follow. As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05], it is now not proposed to disaggregate the limited remaining development requirements for this plan period to individual LSCs. As a result, this report considers the approach to be taken to determining the spatial distribution of safeguarded land.</i></p> <p><i>The Inspector’s Report⁷⁵ on the Local Plan Strategy at paragraph 99-104 considers the approach to safeguarded land:</i></p> <p><i>“99. Policy PG4 sets out CEC’s approach to identifying Safeguarded Land, confirming that development will not be permitted in such areas unless it is justified through a review of the CELPS, and designating the sites identified as Safeguarded Land. The Policy remains unchanged from that in the CELPS-SD, apart from updating the list of sites and deleting the reference to identifying further Safeguarded Land in Poynton, and its approach is consistent with national policy (NPPF; ¶ 85). The CELPS-PC proposes to release some 200ha of land from the Green Belt for Safeguarded Land in the north of the Borough, which is justified in the supporting evidence (SLTA) [PS/E031a.5]; various options for the</i></p>

⁷⁵ [Cheshire East Local Plan Inspector’s Report document link](#)

Local Authority	Detailed Review of Approach to Safeguarded Land
	<p><i>distribution of Safeguarded Land were also considered by CEC [RE/F010; Appx 2]. The overall amount of proposed Safeguarded Land is intended to meet longer-term development needs stretching well beyond the end of the current plan period; in fact, taking account of other sources of land, it should be sufficient for another full 15-year period beyond 2030, so that the Green Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045.</i></p> <p><i>100. Some participants are concerned that the overall amount of proposed Safeguarded Land is inadequate to meet future development needs, but as confirmed in my Further Interim Views (Appendix 2), I consider CEC has taken a balanced and cautious approach to the amount of Safeguarded Land to be identified, which seems to be logical, rational, effective and justified by the supporting evidence; CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land. Since then, no new evidence has been presented to alter this conclusion.</i></p> <p><i>101. Some participants are concerned about the spatial distribution of Safeguarded Land, pointing out that Macclesfield has over 50% of the total amount of such land. However, CEC has fully explained the process and methodology used in selecting and distributing Safeguarded Land, [PS/E031a.5; RM3.001; RE/F010], based on the principles of the revised spatial distribution of development, focused on Macclesfield and the towns in the north of the Borough. Since Macclesfield has the highest amount of growth outside Crewe and is the only Principal Town in the Green Belt, it is sensible and reasonable that its allocation of Safeguarded Land is proportionately higher than other settlements. However, CEC agrees to slightly reduce the area of one Safeguarded Land (Site CS32) for site-specific reasons [MM06]. At Handforth, the apportionment of Safeguarded Land is based on its resident population, rather than on the revised spatial distribution of development [RH/B002.013]; this is more appropriate, given that the alternative would result in far more Safeguarded Land than is necessary being allocated to Handforth, particularly in view of the larger scale of development being allocated at the NCGV and the fact that Handforth may not continue to assist with meeting the needs of other Green Belt settlements into the next plan period.</i></p> <p><i>102. CEC also confirms that the SADPPDPD will consider the need to provide a modest amount of Safeguarded Land at the LSCs, if necessary, in line with the spatial distribution of Safeguarded Land envisaged in the supporting evidence [RE/F010; Appx 2]. Of course, identifying Safeguarded Land does not necessarily mean that it will be developed in the future, but offers the potential for development to be considered in future reviews of the CELPS without needing to alter the Green Belt. The amount and location of development that would be needed on Safeguarded Land would also be based on an assessment of needs at that time.</i></p> <p><i>103. Some argue that the policy should indicate how Safeguarded Land will be brought forward for development within the current plan period. However, this approach would not reflect the purposes of identifying such land, in terms of meeting</i></p>

Local Authority	Detailed Review of Approach to Safeguarded Land
	<p><i>longerterm development needs beyond the current plan period, and would conflict with national policy (NPPF; ¶ 83-85). Furthermore, the CELPS has identified sufficient housing and employment land to meet the assessed requirements, so it is not necessary to identify further alternative or “reserve” sites at this stage. The monitoring framework provides a trigger for action and review if and when a shortfall in housing provision arises.</i></p> <p><i>104. As regards specific sites, CEC proposes to reduce the area of Site CS32, and delete Sites CS51 & CS64 from the list of sites in Policy PG4 and on the accompanying diagram (Fig 8.3) [MM06]. I deal with specific issues related to these and other sites later in my report. Consequently, with the recommended modifications, I conclude that Policy PG4 provides an appropriate, justified, effective and soundly based approach to the provision of Safeguarded Land, which is consistent with national policy, is justified by the exceptional circumstances previously referred to and is necessary to ensure that Green Belt boundaries will be capable of enduring beyond the current Plan period.”</i></p> <p><i>The Inspector’s Report⁷⁶ on the SADPD considers the approach to safeguarded land at paragraph 71-85:</i></p> <p><i>“76. As such, I find that the available evidence continues to justify the need for 200 ha of SL and that exceptional circumstances remain for the alteration of Green Belt boundaries to identify land for the residual requirement of 13.6 ha at the LSCs in the NCGB.</i></p> <p><i>77. Turning to the selection and distribution of sites for SL at the LSCs, Policy PG 12 designates a total of 14.48 ha of SL land across 8 sites. Whilst this exceeds the residual requirement of 13.6 ha for the LSCs, it is a result of the site selection process, which I have assessed below and found to be robust. The overall need for 200 ha is the midpoint in a range of figures which were assessed in determining the total requirement. Therefore, the small surplus in Policy PG 12 is reasonable.</i></p> <p><i>78. The evidence explaining the selection and distribution of the proposed SL sites at the LSCs is set out in the Site Selection Methodology Report (SSMR), the LSC Safeguarded Land Distribution Report and the individual Settlement Reports for the LSCs. This is a refinement of the approach to selecting strategic SL sites in the LPS, which was tested by the Inspector at Examination and found sound.</i></p> <p><i>79. In preparing the SADPD, the Council considered 8 options for the distribution of the 13.6 ha of SL across the settlements. A hybrid approach (Option 8) was chosen as the preferred option, combining several other options, taking account of the extent of services and facilities, constraints, opportunities and impacts on the GB. Applying the site selection</i></p>

⁷⁶ Cheshire East Site Allocation DPD Local Plan Inspector’s Report

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	<p><i>process, suitable sites were identified at each of the LSCs, with areas broadly matching the apportionment of SL for each settlement under the hybrid distribution. The exceptions to this were Mobberley, where no suitable sites were identified, due in particular to the constraints of aircraft noise from Manchester Airport, and Chelford, where the suitable sites were too large for Chelford's apportionment of SL.</i></p> <p><i>80. This led to the decision to redistribute Mobberley's unmet need for SL to Chelford, following a further appraisal of options. It results in Chelford accommodating a much larger share of SL (4.71 ha) than its apportionment under the hybrid distribution (2.55 ha). However, this ensures the overall SL requirement is met and provides for Mobberley's unmet need at the most suitable site available on land at Chelford railway station (site CFD 2), where there are fewer constraints than at the other LSCs in the NCGB. It would also enable Chelford to meet its own long term needs, if required, at a scale where development could be comprehensively planned to incorporate a range of community benefits. Overall, I find the distribution of SL across the LSCs, including the redistribution of Mobberley's apportionment to Chelford, to be justified as an appropriate strategy against reasonable alternatives, based on a robust methodology and proportionate evidence.</i></p> <p><i>81. With regard to site selection, the Settlement Reports contain a detailed and thorough evaluation of the proposed sites and a significant number of alternatives. Sites have been assessed on an equal basis against relevant criteria, including: their contribution to the GB; impacts on ecology, heritage, landscape, highways, flood risk and settlement character; and a range of other factors used to determine their suitability and achievability. The analysis is thorough, equitable and robust, and the reasons for the choice of sites selected are clearly explained and justified.</i></p> <p><i>82. Although future development of some of the proposed SL sites may have adverse impacts on matters such as landscape and highway safety, these would be localised and are considerations to be taken into account by the Council in making any future decisions about their release for development beyond the current plan period. These factors do not undermine the conclusions of the SL site selection process. Ultimately, designating a site as SL does not mean it will be developed in the future, but offers the potential for development to be considered in future reviews of the Local Plan, without needing to alter Green Belt boundaries further. The amount and location of development that would be needed on SL would be based on an assessment of needs at that time</i></p> <p><i>83. Within the Settlement Reports the exceptional circumstances to justify removing each site from the GB are set out, including whether there are any other sites that make a lesser contribution to the purposes of the GB. In most cases, the sites proposed benefit from strong boundaries, which are clearly defined by physical features that are recognisable and likely to be permanent, such as existing development, roads and railway lines, or woodland and mature hedgerows that can be protected as a condition of development. In the few situations where boundaries are not clearly defined, I am satisfied that</i></p>

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	<p><i>this could be mitigated by landscaping. Therefore, I conclude that, whilst the development of the SL sites would compromise GB openness, each is contained and none would undermine the wider function of the GB. Overall, the analysis of each site, in combination with the continued need at a strategic level to designate SL at the LSCs, is sufficient to fully evidence and justify the exceptional circumstances for altering GB boundaries in respect of the 8 sites listed in Policy PG 12.</i></p> <p><i>84. Accordingly, I consider that the proposals for the designation of SL in Policy PG 12 are positively prepared, justified, and consistent with the LPS and national policy.”</i></p>
Durham County Council Local Plan (October 2020)	<p>The Council does not identify any safeguarded land in its adopted Local Plan.⁷⁷</p> <p>At paragraph 77 of the Inspector’s Report,⁷⁸ the Inspector concludes that due to the uncertainty in estimating the amount of development required in future reviews of the Plan, it would be premature to identify safeguarded land. The Inspector states: <i>“Finally, national policy requires that, when defining Green Belt boundaries, it should be demonstrated that they will not need to be altered at the end of the Plan period. I will consider whether that is the case in my assessment of each of the sites being removed from the Green Belt. It is not possible to know at the current time whether changes will need to be made to other already defined Green Belt boundaries in future reviews of the Plan as that will depend on the amount of development needed at the time, the spatial strategy for accommodating it, and the availability of non Green Belt sites. It would be premature to attempt to make decisions about any of those factors now, and there are certainly not exceptional circumstances to justify modifying the Plan to take additional land out of the existing Green Belt to safeguard for potential longer term development”.</i></p>
North Warwickshire Council	<p>The Council does not identify any safeguarded land in its adopted Local Plan.⁷⁹</p>

⁷⁷ [County Durham Plan document link](#)

⁷⁸ [County Durham Plan Inspector’s Report document link](#)

⁷⁹ [North Warwickshire Local Plan document link](#)

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Local Plan (September 2021)	<p>The Local Plan Submission Version (March 2018)⁸⁰ at Policy LP4 (Safeguarded Land for Potential Future Development) identifies an area of safeguarded land. The policy states: <i>“Land to the west of Tamworth Road, Kingsbury, as identified on the Proposals Map, will be removed from the Green Belt and safeguarded for potential future development needs. The identified area will be protected from development other than that which is necessary in relation to the operation of existing uses, change of use to alternative open land uses or temporary uses. All proposals must not prejudice the possibility of long term development on the safeguarded land. The status of the safeguarded site will only change through a review of the local plan.”</i></p> <p>The Inspector’s Report⁸¹ on the adopted Local Plan considers this policy at paragraphs 225-226 and concludes that there is no justification for the proposed safeguarded land. The policy was therefore deleted as part of the Main Modifications:</p> <p><i>“225.However, based on all the evidence before me, there is insufficient justification to merit the safeguarding of land to meet longer-term development needs in the Green Belt at Tamworth Road, Kingsbury within the terms of NPPF2012 paragraph 85. Kingsbury is a ‘Category 3’ settlement, and there is no robust evidence as to whether safeguarding land for future development there would be preferential to any alternatives (for example related to higher order settlements in line with the settlement hierarchy set via Plan policy LP2). Whilst the examination has not assessed whether any alternative sites would be preferable to those proposed, nevertheless there is little distinction between Green Belt sensitivity in respect of land around Kingsbury relative to the surroundings of other ‘higher order’ settlements such as Coleshill.</i></p> <p><i>226.Moreover, as submitted the Plan itself is contradictory as regards the necessity of safeguarding land under NPPF2012 paragraph 85. Local Plan paragraph 14.29 states in respect of Coleshill that ‘it is considered necessary to allocate land outside of its current boundaries and remove land from the Green Belt’. However paragraph 14.32 states that there should be no development outside of the current development boundary (i.e. within the Green Belt). I have reasoned above that there is justification for proposed allocations within the Green Belt. However that is not the case in respect of Plan policy LP4, or in respect of the necessity of the Plan making provision for safeguarded land elsewhere at this juncture. Accordingly policy LP4 should be deleted, as would be achieved via incorporation of MM30. By consequence MM25, MM28, MM29, MM30 and MM113 are also necessary to render supporting justification consistent.”</i></p>

⁸⁰ [North Warwickshire Local Plan Submission Version document link](#)

⁸¹ [North Warwickshire Local Plan Inspector’s Report document link](#)

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<p>Northumberland County Council Local Plan (March 2022)</p>	<p>The adopted Local Plan⁸² at Policy STP 9 Safeguarded Land (Strategic Policy) states:</p> <p><i>“1. Safeguarded land that may be required to meet long term employment needs, beyond the period of the Local Plan, is identified within Policy ECN 6. 2. When assessing development proposals on or affecting safeguarded land, the following principles will apply:</i></p> <p><i>a. Safeguarded land is not allocated for development during the plan period. Permanent development of safeguarded land will only be permitted following the adoption of a replacement Local Plan which proposes such development; and</i></p> <p><i>b. Any development which would prejudice the future comprehensive development of safeguarded land will not be supported.”</i></p> <p>The justification at paragraph 4.80 states:</p> <p><i>“Green Belt boundaries are intended to endure over the longer term. Therefore, when defining new Green Belt boundaries, where necessary, they should be drawn having regard to potential development needs arising beyond the plan period. Given that Green Belt boundaries around Morpeth are being defined for the first time, safeguarded land has been identified within Policy ECN 6 to meet the long-term employment requirements of the town. This safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of the safeguarded land will only be granted following an update to the Plan which may allocate the land for development during that Plan period. The monitoring framework identifies indicators to help determine when a Plan review may be required.”</i></p> <p>The Council had quite specific circumstances for identifying safeguarded land due to the fact that they were defining the detailed boundaries for the Green Belt extension around the Morpeth area for the first time given that the general extent of this area of Green Belt had already been established within the text of the Northumberland Structure Plan (2005). For this reason, they did not have to identify exceptional circumstances to justify this Green Belt extension.</p> <p>The Inspector’s Report⁸³ considers this at paragraph 155-157:</p>

⁸² [Northumberland Local Plan document link](#)

⁸³ [Northumberland Local Plan Inspector’s Report document link](#)

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	<p><i>“155.As I have said, I conclude later in this report that the Plan would provide sufficient land in accordance with the spatial strategy to meet the identified need for housing for the Plan period and beyond. There is therefore no justification for a further release of Green Belt land for housing. It is not possible to know at the current time whether changes will be needed to Green Belt boundaries in future reviews of the Plan as that will depend on the amount of development needed at that time, the spatial strategy for accommodating it, and the availability of non-Green Belt sites. It would be premature to attempt to make decisions about any of those factors now, and there are certainly not exceptional circumstances to justify modifying the Plan to take additional land out of the Green Belt in order to safeguard it to meet unknown development needs after the end of the Plan period.</i></p> <p><i>156.I have noted above the existence of unallocated White Land in Morpeth which can accommodate development needs which are not identified in this Plan; it may come forward during or beyond the Plan period. The Council has used its judgement to establish the boundaries of the White Land and there is no evidence to suggest that this is not reasonable.</i></p> <p><i>157.It is not possible to predict with any certainty what development needs will be in 15-20+ years. Having regard to the considerations which exist at this time, the Council’s housing land supply for the Plan period and the inclusion of unallocated White Land in the Morpeth inset provide the necessary justification to enable me to find that the Plan complies with paragraph 143e of the NPPF.”</i></p> <p>The Council also sought to identify a further area of safeguarded land to the south of an employment allocation (approximately 4ha of land to the south of the employment allocation at Prestwick Pit). At paragraph 126-131 of the Inspector’s Report, the Inspector considers whether there are exceptional circumstances for this:</p> <p><i>“127.The Ponteland Neighbourhood Plan sets out an aspiration to relocate the Meadowfield industrial estate from the centre of Ponteland and allocate that site for mixed use development, including housing, to utilise brownfield land within Ponteland. The Meadowfield industrial estate remains allocated for employment purposes in the Plan. However, the rationale for the safeguarded site (as set out in the Green Belt Review Technical Paper) is that this may allow future relocation of the Meadowfield estate in a Plan review to allow for additional housing to be developed on a centrally located, brownfield site within Ponteland.</i></p> <p><i>128.As addressed above, the current need for employment land identified within the evidence documents would be met by the proposed allocations. Whilst there may be a need for further employment land in Ponteland within the next Plan period, there is no current evidence of this need. It would be very difficult to forecast such a need at this stage as the needs of businesses, both in terms of the amount of land and its location, could have changed significantly within the next 15 years.</i></p>

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	<p><i>129. The feasibility of the relocation of the Meadowfield industrial estate, and any need to utilise the Meadowfield site for mixed use, including housing, has not been demonstrated in the Plan's evidence base. If this remains an aspiration in a future Plan review, and if it can be justified, then the consequences for the need for housing and employment land can be considered and examined at that time.</i></p> <p><i>130. Consequently, I am not satisfied that exceptional circumstances currently exist to justify changing the Green Belt boundaries in the established Green Belt to identify safeguarded land for employment purposes at Ponteland. A modification to the Plan is therefore required to remove the allocated safeguarded land at Prestwick Pit and to retain this site in the Green Belt. This is achieved by a modification to Policy ECN 6 and its justification (incorporated in MM17) and a consequential change to the Policies Map will be needed."</i></p>
<p>Runnymede Borough Council Local Plan (July 2020)</p>	<p>The Council does not identify any safeguarded land in its adopted Local Plan.⁸⁴</p> <p>The Inspector's Report⁸⁵ at paragraph 52-53 considers safeguarded land:</p> <p><i>"52. NPPF states that in reviewing Green Belt boundaries, consideration should be given to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The Plan has a relatively short time horizon and it does not safeguard land for future development needs in the longer term.</i></p> <p><i>53. Nonetheless, in the light of all the factors affecting Runnymede, I consider the longer-term needs can best be addressed by a Surrey-wide approach, as committed to by the planning authorities. This will enable full account to be taken of the nature of the Green Belt in Runnymede and other districts and its importance in protecting the regional function of the wider Green Belt."</i></p>
<p>St Helen's Council</p>	<p>The adopted Local Plan⁸⁶ at Policy LPA05 (Safeguarded Land) states:</p>

⁸⁴ [Runnymede Local Plan document link](#)

⁸⁵ [Runnymede Local Plan Inspector's Report](#)

⁸⁶ [St Helen's Local Plan document link](#)

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Local Plan (July 2022)	<p><i>“1. The sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs well beyond this Plan period. Such Safeguarded Land is not allocated for development in this Plan period. The future uses that the sites are safeguarded for are listed in Tables 4.13 and 4.14.</i></p> <p><i>2. Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.13 and 4.14 will only be granted following a future Local Plan update (full or partial) that proposes such development based on the evidence showing a need for additional land or issues with the supply of land identified by this Local Plan. Otherwise, proposals for housing and employment development of safeguarded sites in this Plan period will be refused.”</i></p> <p>The Council allocates 85.88ha of safeguarded employment land (two sites) and it allocates eight safeguarded housing sites (totalling 2739 dwellings). The justification is provided at para 4.21:</p> <p><i>“4.21.1 In accordance with Policy LPA01, the sites listed in Tables 4.13 and 4.14 have been safeguarded to meet potential long term development needs. Whilst they have been removed from the Green Belt, they are not allocated for development before 2037. Their purpose is to ensure that the new Green Belt boundaries set by this Plan can endure well beyond 2037. The reasons why specific sites are safeguarded rather than allocated for development before 2037 are set out in the St Helens Green Belt Review 2018. The safeguarded sites are protected from other forms of development that would prevent or significantly hinder their future development for the uses identified in Tables 4.13 and 4.14. This is to ensure that, potentially, they could be used for these purposes in the future.</i></p> <p><i>4.21.2 The development of the safeguarded sites for the purposes in Tables 4.13 and 4.14 will only be acceptable if a future Local Plan update, either full or partial, confirms that such development is both acceptable and required, and proceeds to allocate such sites for development in that update. The Council may undertake and bring into effect such a Local Plan update within the current Plan period of 2020-2037, should this be required and justified by the latest evidence. This is likely to be informed by the level of need for housing and / or employment development (whichever use is identified for the specific site) compared to site supply, infrastructure capacity and needs, and any other factors that may affect the delivery of the sites at that time.”</i></p> <p>At paragraph 4.21.7 onwards, the Council considers the exceptional circumstances to justify removing the land from the Green Belt, taking each site in turn. It is clear that these sites did not score as highly compared to the other employment and housing allocations. Some of the sites had highways or access issues, or other physical constraints which would take a</p>

Local Authority	Detailed Review of Approach to Safeguarded Land
	<p>longer time to be addressed. The Council's Green Belt Review (2018)⁸⁷ explains the approach to determining whether sites should be allocated or safeguarded.</p> <p>The Inspector's Report⁸⁸ at paragraph 104-109 considers the Council's approach to Safeguarded Land:</p> <p><i>"104. The Framework advises that, 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. The Plan identifies safeguarded land to meet longer-term housing and employment land needs through Policy LPA06.</i></p> <p><i>105. The safeguarded employment land at Omega and Haydock is adjacent to the strategic road network and existing well-established employment sites. The eight safeguarded sites for housing achieve a reasonable geographic spread around the Borough, including land adjacent to the St Helens Core Area and Newton-le-Willows/Earlestown.</i></p> <p><i>106. National policy does not quantify how much safeguarded land should be identified. The safeguarded employment land amounts to some 85 ha, or some 9 years supply based on the current OAN, whereas the housing land would provide for around 2700 dwellings or some 6 years supply based on the current OAN. However, it should also be noted that some of the allocated strategic housing sites are projected to deliver a significant proportion of development beyond the Plan period such that over 3200 homes would be likely to be built on these allocations post 2037.</i></p> <p><i>107. The Plan needs to achieve a balance between protecting Green Belt and ensuring that Green Belt boundaries do not need to be altered again at the end of the Plan period. Moreover, there are uncertainties about what future needs will be or what non-Green Belt opportunities may arise. The Plan achieves an appropriate quantum of safeguarded land and demonstrates exceptional circumstances in this respect. We come on to the particular Green Belt impacts of the safeguarded land later in the report under Issue 3.</i></p> <p><i>108. Policy LPA06 is broadly consistent with the Framework in requiring that planning permission for the permanent development of safeguarded land should only be granted following an update to a plan. Alternative approaches, such as allowing a phased release of safeguarded land through this Plan, would not be consistent with national policy.</i></p>

⁸⁷ [Green Belt Review document link](#)

⁸⁸ [St Helens Local Plan Inspector's Report document link](#)

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	<p><i>109. However, in order to ensure that Policy LPA06 is positively prepared, it should recognise that it may be necessary to update the Plan partially or fully during the current Plan period, to respond to new evidence. Such a change would also reflect the advice within paragraph 33 of the Framework about reviewing plans. The changes to Policy LPA06 and its explanation would be achieved by MM011. We have amended MM011 following consultation to make reference to issues of both need and supply so that it is positively prepared.”</i></p> <p>The Council’s accompanying evidence in the form of the Housing Need and Supply Background Paper (October 2020)⁸⁹ and the Employment Need and Supply Background Paper (October 2020)⁹⁰ provides further information on the approach to safeguarded land.</p> <p>The Housing Need and Supply Background Paper (October 2020)⁹¹ at paragraph 3.51-3.57 describes the approach:</p> <p><i>“3.52 In the absence of national guidance, the Council have sought to use a practical and balanced approach to the designation of safeguarded land. Being mindful of the uncertainties that are inherent with calculating longer term needs and the need to demonstrate exceptional circumstances to justify the release of Green Belt land, the Council have not sought to identify a specific housing need figure for post 2035. The Council have instead identified a reasonable amount of land to be safeguarded in order to meet future development needs. SHBLP Policy LPA06 identifies 8 sites to be removed from the Green Belt and safeguarded in order to meet longer term development needs beyond the Plan period. Policy LPA06 indicates that planning permission for the development of the safeguarded sites will only be granted following a future Local Plan Review that proposes such development identified a reasonable amount of land to be safeguarded in order to meet future development needs.</i></p> <p><i>3.53 While the Council have not used a specific methodology for calculating post Plan period needs, the Plan period housing requirement is considered a reasonable basis to measure the provision of safeguarded land against. When projecting forward the housing requirement of 486 dwellings per year, the estimated combined capacity of the sites safeguarded for housing of 2,641 dwellings equates to 5.4 years of housing supply. If you remove the cap of 500 dwellings</i></p>

⁸⁹ [Housing Need and Supply Background Paper document link](#)

⁹⁰ [Employment Need and Supply Background Paper document link](#)

⁹¹ [Housing Need and Supply Background Paper document link](#)

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	<p><i>applied at site 3HS by Policy LPA06 (based on highway capacity issues), then the safeguarded sites provide for 6.4 years of housing supply.</i></p> <p><i>3.54 It is important to recognise that the Plan also includes indicative post-2035 delivery of 3358 dwellings, from allocated housing (sites 2HA, 4HA, 5HA, 6HA and 10HA), the delivery of which is expected to continue well beyond 2035. Based on the Plan period housing requirement of 486 dwellings per annum, this equates to a further 6.9 years of housing land supply.”</i></p> <p>The Council notes that the windfall allowance would equate to an additional 1.4 years of supply (para 3.55). The Council had also allowed for a SHLAA capacity reduction for non-delivery of 15% for years 6-15 and a 20% buffer to the Green Belt allocations to allow for contingencies (see para 3.56). These extra allowances would either enable the full net housing requirement to be delivered by 2035 or would result in overprovision which would then reduce development requirements in the next Plan period.</p> <p>At para 3.57 the Council comments on their previous approach: <i>“It is also important to note that the Local Plan Preferred Options (2016) did seek to include 15 years of safeguarded housing land beyond the Plan period, on which the basis was projecting forward the then proposed 570 dwellings per annum housing requirement. However, there was significant opposition to this approach from local residents and stakeholders.”</i></p> <p>The Preferred Options document (2016)⁹² when considering reasonable alternatives at paragraph 4.49-50 states that the Council would not be able to distribute the safeguarded housing sites to each settlement, proportionate to the settlement population. Paragraph 4.50 sets out the justification for this: <i>“The Green Belt assessment did not identify enough land as being suitable for release from the Green Belt to enable a distribution. There is insufficient data on housing needs per settlement to justify releasing sites from the Green Belt around each settlement to meet these needs rather than being primarily led by suitability for release from the Green Belt.”</i></p>
Wakefield Council	<p>The adopted Local Plan⁹³ at Policy SP4 states:</p> <p><i>“Areas of safeguarded land have been identified on the edge of settlements which may be suitable to meet longer term development needs for housing or employment land. Within these areas shown as Safeguarded Land on the Policies Map,</i></p>

⁹² [St Helens Preferred Options document link](#)

⁹³ [Wakefield Local Plan document link](#)

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Local Plan (January 2024)	<p><i>development will be restricted to that which is necessary for the operation of existing uses together with such temporary uses that will not prejudice the possibility of long term development. Permanent development on safeguarded land shall only be considered through the process of preparing and updating the Wakefield District Local Plan.”</i></p> <p>The Council allocates 12 sites as safeguarded land in the Plan. In total the safeguarded land amounts to 144.24ha – this includes six sites (48.12ha) of LDF safeguarded land carried forward to the Plan plus a further six sites (96.12ha) of safeguarded land designated for the first time in the Plan. 103.08ha of land allocated in the LDF as safeguarded land was not carried forward.</p> <p>The Council’s justification is set out in the updating Safeguarded Land Information Note (September 2021)⁹⁴ at paragraph 3.1 which states:</p> <p><i>“The National Planning Policy Framework at point e) of paragraph 143, states when defining Green Belt boundaries in a local plan planning authorities should be able to demonstrate that these boundaries will not need to be altered at the end of the plan period. It is unlikely that this could be achieved in Wakefield without ensuring safeguarded land is identified. This is because the vast majority of land outside of the Plan settlement boundaries, as defined on the Policies Map, is Green Belt land. It is unlikely that at the end of the plan period in 2036 adequate amounts of land could be identified that can satisfy development needs within the settlement boundaries proposed for the Plan. Additionally, it has been the practice in Wakefield for many years, over a number of plan cycles, to include safeguarded land in development plans in order to ensure a long term stock of land is identified that can be considered when a new plan is being prepared. In previous plans these areas were called ‘protected areas of search’.”</i></p> <p>The Inspector’s Report at paragraph 95-108 considers the approach to safeguarded land, stating:</p> <p><i>“95. The Plan identifies a number of safeguarded sites that, through the application of Policy WSP 4, could be considered for housing or employment development via a future review of the Plan. Six sites were previously identified in the LDF and a further six new sites are proposed to be released from the Green Belt.</i></p> <p><i>96. The Council’s Safeguarded Land Information Note (September 2021) (document 2.17) indicates that the sites comprise some 144 hectares and are capable of delivering some 3,642 homes. This would amount to about 2.5 years supply based on the current identified housing target. The Plan as modified Wakefield Council, Wakefield District Local Plan 2036, Inspector’s Report November 2023 24 identifies a further 1,153 or so dwellings that would come forward on allocated sites</i></p>

⁹⁴ [Safeguarded Land Information Note document link](#)

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	<p><i>beyond 2036 and help to meet longer-term development needs. It is also reasonable to assume that additional windfall supply is likely to be realised.</i></p> <p><i>97. There is some uncertainty regarding the exact extent of future housing needs in Wakefield district beyond the Local Plan period. However, it is reasonable to surmise that there may be some future housing land requirements and that new sites could be required. Given the extensive Green Belt coverage in Wakefield district, the designation of safeguarded land could be beneficial in helping to provide Green Belt boundaries with a degree of permanence beyond the Plan period.</i></p> <p><i>98. Safeguarded land can provide flexibility and the approach is supported by the NPPF. The Council's decision to designate safeguarded land is, in principle, appropriate. In the absence of national guidance on the amount of safeguarded land that should be identified, I am satisfied that the scale of safeguarded land identified in the Plan is reasonable.</i></p> <p><i>99. The Council appraised a wide range of potential options and carried out technical site assessment and SA. The six new selected safeguarded sites are focused on urban areas. The approach is consistent with the spatial strategy and principles of sustainable development. The evidence indicates that the retained and new safeguarded sites could potentially be suitable, deliverable and available for development in the future. The six new sites have individually demonstrated exceptional circumstances to justify release from the Green Belt. Details are set out below."</i></p>
Warrington Borough Council Local Plan (December 2023)	<p>The adopted Local Plan⁹⁵ at paragraph 3.4.2-3.4.5 considers the Council's exceptional circumstances case noting that the Council has carried out a comprehensive review of its SHLAA and Brownfield Register to ensure it has optimised development potential of the existing urban area. Paragraph 3.4.5 states: "<i>The Council recognises that some of these opportunities will fall outside of the Plan period. Together with the longer term delivery from the Plan's site allocations and other potential sites within the wider existing urban area, this negates the requirement to take any additional land out of the Green Belt as Safeguarded Land</i>".</p> <p>Paragraph 5.1.15-5.1.19 concludes that the revised Green Belt boundaries will endure well beyond the end of the Plan Period without having to identify any safeguarded areas of land. The Council acknowledges the uncertainties over Warrington's longer term employment land supply beyond the end of the Plan Period and the Council commits to undertaking a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land.</p>

⁹⁵ [Warrington Local Plan document link](#)

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	<p>The Local Plan Examination hearings took place in September/October 2022. The Council’s Matter Statement⁹⁶ in relation to Matter 3: Spatial Strategy responds the Inspector’s question as to whether safeguarded land is required. Paragraph 27.1 states:</p> <p><i>“27.1 The Council considers that there will be sufficient land supply to meet the level of housing need for at least 12 years following the end of the Plan period. This is due to the ability of the Main Development Areas to deliver homes beyond the end of the Plan Period; the anticipated supply of brownfield sites; increased supply of homes over the Plan period addressing issues of affordability; and the projected slower growth in households over time. This is detailed in paragraphs 5.8 to 5.17 of the Development Options and Site Assessment Technical Report 2021 (O1).</i></p> <p><i>27.2 The Council is therefore confident that there is no need for the additional flexibility that would be provided by designating any land as safeguarded land in respect of future housing or employment needs and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.</i></p> <p><i>27.3 If housing land supply issues become apparent through the Council’s monitoring process, then the Council will give consideration to a review of the Plan in accordance with Policy M1.</i></p> <p><i>27.4 The proposed allocations at Fiddlers Ferry and the South East Warrington Employment Area provide a total of 237.92 ha, which is marginally below the required need by around 8 ha. The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in existing employment locations. There is also the potential of agreement with St Helens that the additional land at Omega West should contribute to meeting Warrington’s needs as detailed in the response to question 20 above.</i></p> <p><i>27.5 The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites.</i></p> <p><i>27.6 The Council is however committed to undertaking a review into Warrington’s employment land needs every 5 years and in any event, well before the end of the Plan period to ensure the long term supply of employment land. At this stage, it</i></p>

⁹⁶ [Warrington Council Matter 3 Statement document link](#)

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	<p><i>is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised.”</i></p> <p>The Inspector’s Report⁹⁷ at paragraph 121 considers safeguarded land:</p> <p><i>“121. National policy does not require Local Plans to identify safeguarded land. Paragraph 143 of the NPPF states that such land should be identified, where necessary, in order to meet longer term development needs stretching well beyond the plan period. It is not possible at this point in time to forecast what the future needs for housing and employment land may be beyond the plan period. Nor is it possible to predict what an appropriate strategy might be to accommodate them. The South East Warrington Urban Extension (SEWUE) will provide scope for housing development to continue after the plan period and there is a clear commitment to monitor and review the situation regarding development needs. There is no need for the Local Plan to identify safeguarded land.”</i></p>

⁹⁷ [Warrington Local Plan Inspector’s Report document link](#)

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