

Lichfield District Council

**A Review of the Potential to
Identify New Green Belt to the
North of Lichfield**

Technical Note

Final Issue | 16 March 2021

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

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

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Contents

	Page
1 Introduction	1
1.1 Overview	1
1.2 Description of the Proposed Area	1
1.3 Structure of the Report	3
2 National Policy Context	4
2.1 National Planning Policy Framework (2019)	4
2.2 Comparative Examples	4
3 NPPF Paragraph 135 – criterion (a)	7
3.1 Overview	7
3.2 Relevant Development Management Policies	7
3.3 Adequacy of the Development Management Policies	8
3.4 Emerging Policies	10
3.5 Alternative Policies	11
3.6 Conclusion	13
4 NPPF Paragraph 135 – criterion (b)	14
4.1 Overview	14
4.2 Major Changes	14
4.3 Conclusion	15
5 NPPF Paragraph 135 – criterion (c)	17
5.1 Overview	17
5.2 Sustainable Development	17
5.3 Conclusion	17
6 NPPF Paragraph 135 – criterion (d)	18
6.1 Overview	18
6.2 The Necessity for Green Belt	18
6.3 Conclusion	25
7 NPPF Paragraph 135 – criterion (e)	26
7.1 Overview	26
7.2 Meeting other Objectives of the Framework	26
7.3 Conclusion	26
8 Conclusion and Recommendations	27
8.1 Conclusion	27
8.2 Recommendation	28

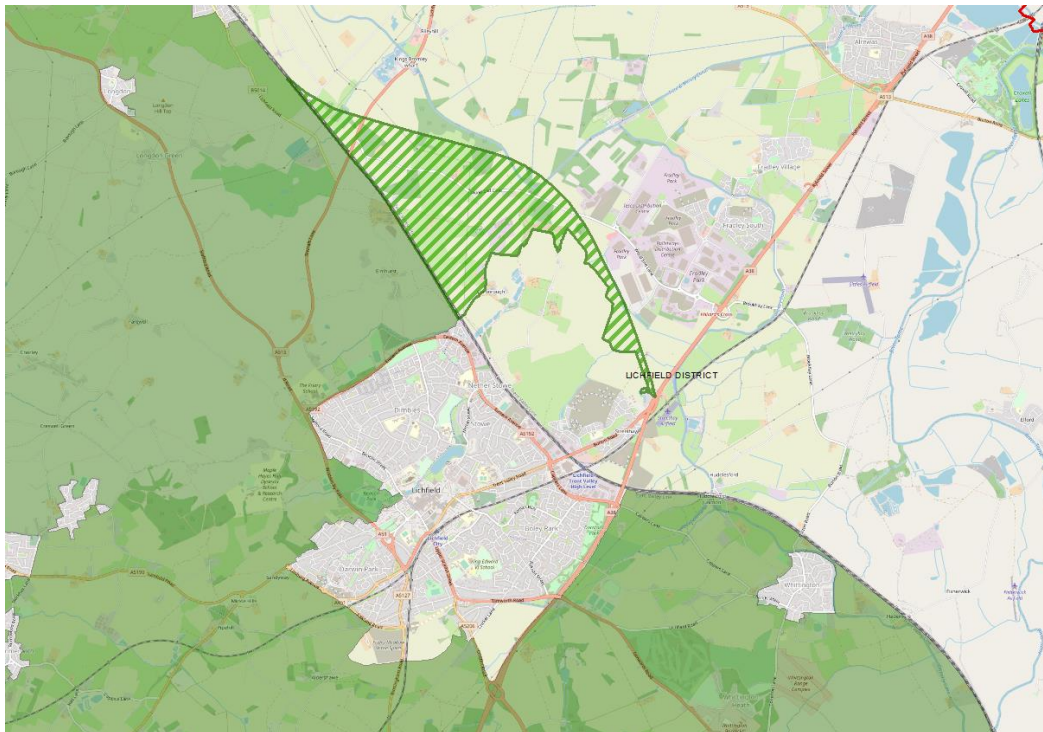
1 Introduction

1.1 Overview

In September 2020, Ove Arup and Partners ('Arup') was appointed by Lichfield District Council ('the Council') to prepare a Stage 2 Green Belt Review as part of the evidence base for the Local Plan Review.

This study forms part of the Stage 2 Green Belt Review commission and relates to the potential designation of new Green Belt land to the north of Lichfield. Strategic Policy ONR1 of the Preferred Options Local Plan Review (Regulation 18) (November 2019) stated that: "*New Green Belt will be identified to the north of Lichfield alongside the strategic development allocation and defined by the line of HS2. This new Green Belt will define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley.*" This Technical Note will consider whether there is an exceptional circumstances case to justify the expansion of the Green Belt to the north of Lichfield as shown on the Preferred Options policy map. This area is shown on Figure 1 below. Paragraph 135 of the National Planning Policy Framework (NPPF) makes clear that new Green Belts should only be established in exceptional circumstances and sets out a number of criteria which should be met when proposing new Green Belt land.

Figure 1. Proposed area of potential new Green Belt as shown on the Preferred Options policy map (area shown by the green stripes)

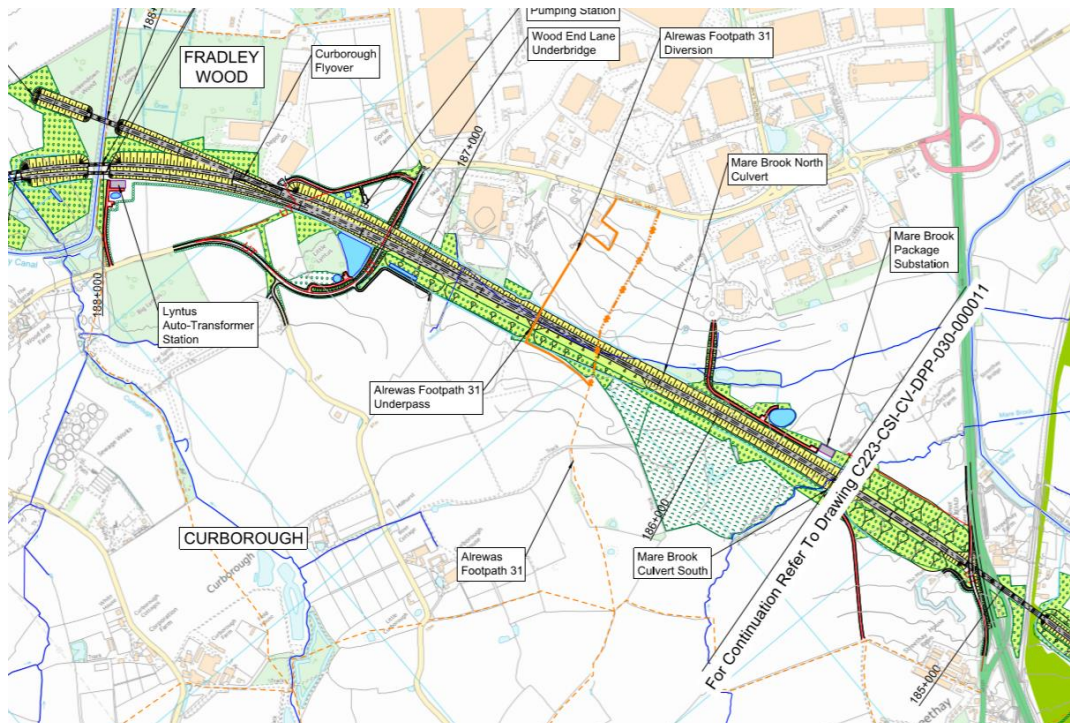


1.2 Description of the Proposed Area

The proposed area is located in an area of open countryside to the north of Lichfield City. The area stretches from the existing northern edge of Lichfield

City towards the south eastern edge of Armitage with Handsacre although it doesn't extend as far as the settlement. The area curves around the 'Land at Watery Lane' housing allocation (this was allocated as Site OR7 in the Local Plan Allocation Document 2019 after being permitted on appeal in February 2017 (Appeal Ref: APP/K3415/A/14/2224354)) and the most recent Strategic Housing Allocation (SHA1) from the Preferred Options Local Plan Review. SHA1 extends right up the HS2 line and the earthworks around it. The proposed area extends round to the east to join the A38. This part of the proposed area separates Lichfield and Fradley and consists of the HS2 line. Part of the HS2 line falls within Phase 1 of the scheme which received Royal Assent in February 2017. The section of the line after Brokendown Wood which forms the Manchester Spur falls within Phase 2a of the HS2 scheme which is due to receive Royal Assent imminently. Part of the HS2 line will be within a cutting with part of the line being on an embankment (as shown on Figure 2 below). The inner boundary of the area with the strategic development allocation (the proposed inner Green Belt boundary) would be defined by Watery Lane, a short section of Curborough Brook, the limits of Curborough Sprint Course, Netherstowe Lane, a short section of Mare Brook, and field boundaries. Some sections of the inner boundary would not be defined by any physical features on the ground. The proposed area consists of open countryside and agricultural land. The only existing uses within the area are a sewage works, Curborough Sprint Course, and some residential properties to the south off of the A38.

Figure 2. HS2 Phase 1 Hybrid Bill Submission Plan and Profile Maps Chetwode to Handsacre (2013)¹



¹ Minor changes were made to the scheme as a result of the House of Commons Select Committee however the pattern of land take remained the same, see page 44 of the HS2 Consolidated Plans and Sections Volume 3.2 (2016)

1.3 Structure of the Report

This report is structured as follows:

- Section 2 sets out the national policy context in relation to the designation of new Green Belt land. It also provides a review of comparative examples from other local authorities who have sought to extend their Green Belt designation;
- Sections 3-7 evaluate the case and existing justifications for the expansion of the Green Belt to the north of Lichfield and considers whether an exceptional circumstances case exists in accordance with the criteria set out in paragraph 135 NPPF:
 - Section 3 considers whether normal planning and development management policies would be considered to be adequate (paragraph 135, criteria a);
 - Section 4 considers whether any major changes in circumstances have made the adoption of the proposed new Green Belt necessary (paragraph 135, criteria b);
 - Section 5 considers what the consequences of the proposed new Green Belt would be for sustainable development (paragraph 135, criteria c);
 - Section 6 considers whether the proposed new Green Belt is necessary and whether it is consistent with strategic policies for adjoining areas (paragraph 135, criteria d);
 - Section 7 considers whether the proposed new Green Belt would meet the other objectives of the Framework (paragraph 135, criteria e); and
- Section 8 sets out the conclusion and recommendations from this study.

2 National Policy Context

2.1 National Planning Policy Framework (2019)

Paragraph 135 of the NPPF makes clear that new Green Belts (taken to include both completely new and extensions to existing) “...*should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.*” It adds that: “*Any proposals for new Green Belts should be set out in strategic policies, which should:*

- a) *demonstrate why normal planning and development management policies would not be adequate;*
- b) *set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- c) *show what the consequences of the proposal would be for sustainable development;*
- d) *demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and*
- e) *show how the Green Belt would meet the other objectives of the Framework.*” (paragraph 135)

There is no direct reference within the National Planning Practice Guidance (PPG) to new Green Belt policy.

The Planning Advisory Service ‘Planning on the Doorstep: The Big Issues – Green Belt’ guidance confirms land can only be included in Green Belt to achieve the five purposes of Green Belt (as set out in paragraph 134). Therefore, land proposed for inclusion in the Green Belt should be assessed against the five purposes to identify the level of contribution made and whether the land contributes to the overall aim of the Green Belt. Paragraph 133 of the NPPF states that ‘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.’

2.2 Comparative Examples

A review of good practice from other local authorities shows that there are very few instances in recent years where local authorities have sought to extend their Green Belt designation. New Green Belt has only been introduced through Local Plans as a result of minor boundary modifications and no significant areas of Green Belt have been proposed and subsequently adopted at Examination. In the case of Cheshire East Council, a proposal to extend the Green Belt designation was rejected by the Inspector at the Local Plan Examination. Northumberland County Council have proposed an extension to their Green Belt and the Examination on their Local Plan is currently in progress.

2.2.1 Cheshire East Council Local Plan Examination

Cheshire East Council identified through their ‘New Green Belt and Strategic Open Gap Study’ (2014) that the land gap between Crewe and Nantwich is narrow and is mostly occupied by highways infrastructure and is rarely so wide that development cannot be perceived on the opposite side. This evidence resulted in the designation of new Green Belt adjacent to Crewe within Policy PG3 of the Local Plan Strategy (2014), with a policy justification of maintaining ‘strategic openness of the gap between Crewe and the Potteries’.

The Inspector published his interim views on the Legal Compliance and Soundness of the submitted Cheshire East Local Plan on 12th November 2014 and provided subsequent clarification in a letter dated 28th November 2014. With regard to the proposed new area of Green Belt, the Inspector commented:

“...there seems to be insufficient justification for establishing a new Green Belt in the south of the district.” (Section A, paragraph 4).

In particular, the Inspector highlighted the following points needed to be addressed in relation to proposals to establish new Green Belt (in paragraphs 91 and 92 of his interim views and paragraph 2vi of his clarification letter):

- Identify exceptional circumstances needed to establish proposed new Green Belt;
- Provide evidence to support the likely extent of the new Green Belt;
- Set out implications of proposed development within the new Green Belt search area;
- Demonstrate the other policy is insufficient and new Green Belt is therefore required; and
- Include proposed detailed boundaries of new Green Belt.

When reviewed against NPPF requirements for the extension of Green Belt, such as an ability to demonstrate exceptional circumstances and a consideration of whether other development management policies are inadequate, it was considered that alternative policy options may be more appropriate.

During the suspension of the examination, a Strategic Green Gap Policy was proposed (Policy PG 5 Strategic Green Gaps), with the purpose of protecting the setting and separate identity of settlements, retaining the existing settlement patterns and retaining benefits of open land near to where people live. Following the recommended Examination hearing sessions, the Inspector concluded:

“In my Interim Views (Appendix 1), I considered there was insufficient evidence and no exceptional circumstances to justify establishing a new Green Belt in this locality... CEC subsequently proposed a new Strategic Green Gaps policy covering a similar area, following advice from their consultants. At the heart of this policy is the need to manage the rapidly changing settlement pattern in south Cheshire, particularly due to the growth of Crewe... Without such a policy, development could begin to erode the gaps between existing settlements and possibly lead to their coalescence if only protected by the open countryside

policy...Consequently, with the recommended modifications, the purpose and proposed approach to the designation of Strategic Green Gaps within the area to the south, east and west of Crewe is appropriate, fully justified, effective, positively prepared, soundly based and consistent with national policy.” (Cheshire East Local Plan Inspector’s Report, paragraph 105-110).

The Cheshire East Local Plan Strategy was adopted in 2017.

2.2.2 Northumberland County Council

The Council propose a Green Belt extension around the Morpeth area. An extension to the Green Belt was originally identified within the Regional Planning Guidance in 2002 and defined generally within the text of the Northumberland Structure Plan (2005).

Paragraph 6.2 of the Council’s Hearing Statement on Green Belt sets out their justification for the Morpeth Green Belt Extension: *“The outer boundary has been identified to reflect the area described within saved Policy S5 of the Northumberland County and National Park Joint Structure Plan Policy S5 – Extension to the Green Belt (2005) (NCC.19.36). It is the view of the Council that, in line with paragraph 135 of the NPPF, the general extent of the Morpeth Green Belt extension is already established. Therefore other outer boundary options which differ from the area described in saved Policy S5 would represent a change to the Green Belt and would require exceptional circumstances.”*

In defining the boundary for the extension, the Council undertook a review of the inner and outer Green Belt boundary. The review of the inner Green Belt boundary was to ensure that the boundary included sufficient land to meet the growth requirements. The review of the outer Green Belt boundary used textual references within the Structure Plan to define the outer boundary using strong infrastructure and natural features. The Green Belt will preserve the special setting and character of Morpeth, prevent Morpeth from merging with neighbouring settlements, assist regeneration of villages in South Northumberland and safeguard the countryside from encroachment.

The Council submitted their Local Plan to the Secretary of State in May 2019 and the Examination is currently ongoing with the second phase of hearing sessions taking place in October and November 2020.

3 NPPF Paragraph 135 – criterion (a)

3.1 Overview

This section evaluates the case and existing justifications for the proposed new area of Green Belt and considers whether an exceptional circumstances case exists in accordance with the criteria set out in paragraph 135 NPPF.

Criterion (a) is as follows: “*demonstrate why normal planning and development management policies would not be adequate.*”

3.2 Relevant Development Management Policies

The proposed area is located in the open countryside where the following development management policies currently apply:

Lichfield District Local Plan Strategy (2015)

- Core Policy 1: The Spatial Strategy
- Core Policy 2: Presumption in Favour of Sustainable Development
- Core Policy 3: Delivering Sustainable Development
- Core Policy 6: Housing Delivery
- Core Policy 14: Our Built and Historic Environment (this is relevant due to the views of Lichfield Cathedral from the countryside)
- Policy NR1: Countryside Management
- Policy NR3: Biodiversity, Protected Species and their Habitats
- Policy NR4: Trees, Woodland and Hedgerows
- Policy NR5: Natural and Historic Landscapes
- Policy BE1: High Quality Development

The supporting text to Policy NR1 at paragraph 11.13 sets out the main restrictions upon development: “*The countryside should be protected from inappropriate development which would cause environmental harm (including in terms of visual impact), in order to protect the countryside's intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and the wealth of its natural resources, so that it may be enjoyed by all. To this end new building development in the countryside away from existing settlements, or outside of those areas designated for development within this Local Plan, will be strictly controlled.*”

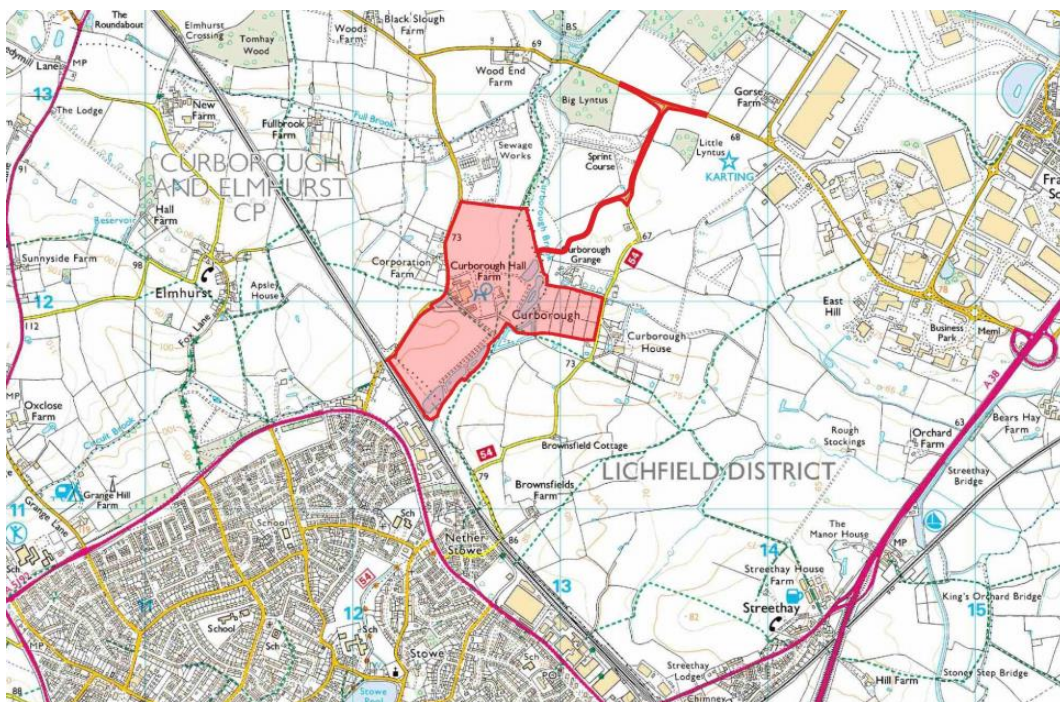
Although there were a number of saved policies of the Lichfield District Local Plan (1998), these have now all been replaced by the Local Plan Strategy (2015) and the Local Plan Allocations (2019).

None of the Local Plan Allocations Policies are directly relevant to the proposed area.

3.3 Adequacy of the Development Management Policies

The adequacy of the development management policies was tested through the application for development at Land off Watery Lane (Ref: 14/00057/OUTMEI) which is located adjacent to the proposed new Green Belt area. This application was for the construction of up to 750 dwellings, a primary school, care village, local neighbourhood facilities and associated infrastructure. This application was submitted in January 2014 and was refused by the Council in May 2014. The appeal was dismissed by an Inspector in March 2016 however the Inspector's decision was overturned by the Secretary of State and the appeal was allowed and planning permission was granted in February 2017 (Ref: APP/K3415/A/14/2224354). The location of the site is shown in Figure 3 below.

Figure 3. Site Location Plan for the application for development at Land off Watery Lane.



The application was originally refused by the Council as it was not in accordance with the Development Plan, being contrary to Policy E6 (Development in Rural Areas) of the Lichfield District Local Plan (1998) (saved policies) and Core Policies 1 (The Spatial Strategy) and 6 (Housing Delivery) of the Lichfield District Local Plan Strategy (Proposed Submission July 2012) and the NPPF. Saved Policy E6 was superseded by the Local Plan Strategy which was adopted in 2015.

On appeal, the Inspector concluded that the Council could not demonstrate a 5-year housing supply however this did not displace the presumption in favour of the Development Plan. In addition, he attached considerable weight to the harm to

the setting of the listed building and to the loss of irreplaceable habitat (veteran trees). He concluded that even if the second footnote of paragraph 14 (NPPF 2012, now paragraph 11) was engaged, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.

At paragraph 63 the Inspector concluded the following:

“It should be concluded that to allow the appeal scheme:

- *would be to locate development in other than the most sustainable of locations, as spatially identified in Policy CP1;*
- *would not have a positive impact on the natural and historic environment in landscape terms, contrary to Policy BE1;*
- *would be contrary to Policy NR1, because it would be significantly harmful to the countryside as an asset in its own right (in terms of both character and visual impact); and*
- *would cause related harm under Policies CP13 and CP14 (dealt with below).”*

On appeal, the Secretary of State disagreed with the Inspector. He concluded that the Council could now demonstrate a 5-year housing land supply. He stated:

“the appeal scheme is not in accordance with Core Policies and Policies NR3, NR4, NR5 and BE1 of the 9 adopted Local Plan Strategy, Policies DC1, DC1 or H3, E3 and E18B, and Core Policies 14 and C1 of the Lichfield District Local Plan 1998. He thus concludes that the proposal is not in accordance with the development plan overall.”

However in considering whether there are any material considerations which indicate that the proposal should be determined other than in accordance with the Development Plan, he attached very substantial weight to the benefits of the provision of affordable and market housing and concluded that these outweigh the environmental harm and therefore the proposal represents sustainable development. On this basis he allowed the appeal.

The appeal case shows that whilst the relevant development management policies had been correctly applied and are serving their intended purpose, the benefits of development had been judged to outweigh the impact on the countryside (and other impacts). The relevant policies listed above are arguably not as strongly restrictive as Green Belt policy.

Prior to the appeal decision, no other applications had been approved on the appeal site except for permissions associated with Curborough Antiques and Craft Centre and Curborough Hall Fishing Lakes. In March 2008 a planning application was submitted for a new community of up to 5000 dwellings which included the northern part of the appeal site. This was withdrawn in February 2011. Other proposals were subsequently promoted through the Local Plan Strategy Examination hearing sessions, including a 2000 dwelling new settlement. The Local Plan Examination Inspector stated: *“there is no clear indication that the proposed new village at north east Lichfield would be a more suitable or*

sustainable alternative than the strategy selected by the Council in the Plan.” (Inspector’s Report, January 2015, paragraph 175). Outside of the appeal site, permission for a single wind turbine at the sewage works was granted at appeal in February 2013.

There have been no major applications for development within the proposed area of new Green Belt in the past two years and there have been no appeals. Table 1 below shows the applications within the past two years. There does not appear to be any development pressure within this area at present although this could change.

Table 1. Planning applications within the proposed area of new Green Belt within the past two years.

Application Ref	Address	Application Type	Description
20/00397/FUL	Fullbrook Nursery Watery Lane Curborough Lichfield Staffordshire WS13 8ER	Full (minor)	Retention of 2no. general purpose horticultural buildings
19/00158/HST	Proposed HS2 Line Ravenshaw Cluster Lichfield Staffordshire	Full – HS2	The creation of four ponds and four reptile basking banks

3.4 Emerging Policies

When the emerging Local Plan Review is adopted it will replace the policies in the current Local Plan Strategy and Local Plan Allocations document. It is therefore necessary to review the relevant emerging Local Plan Review policies and compare these to the existing policies.

Relevant Local Plan Strategy policies	Emerging Local Plan Review policies	Comments
Core Policy 1: The Spatial Strategy	Strategic Policy OSS2: Our Spatial Strategy	Equivalent policy - Emerging policy has a similar purpose
Core Policy 2: Presumption in Favour of Sustainable Development	Strategic Policy OSS1: Presumption in favour of sustainable development	Equivalent policy - Emerging policy has a similar purpose
Core Policy 3: Delivering Sustainable Development	Strategic Policy OSC1: Securing Sustainable Development	Equivalent policy - Emerging policy has a similar purpose
Core Policy 6: Housing Delivery	Strategic Policy OHF1: Housing provision	Equivalent policy - Emerging policy has a similar purpose

Core Policy 14: Our Built and Historic Environment	Strategic Policy OBHE1: Historic environment	Equivalent policy - Emerging policy has a similar purpose
Policy NR1: Countryside Management	Strategic objective and priority 12: Countryside Character	There is no equivalent emerging policy which covers countryside management. The strategic objective refers to it however there is no equivalent policy which links to it.
Policy NR3: Biodiversity, Protected Species and their Habitats	Strategic Policy ONR2: Habitats and Biodiversity	Equivalent policy – the emerging policy combines the previous policies NR3 and NR4.
Policy NR4: Trees, Woodland and Hedgerows	Strategic Policy ONR2: Habitats and Biodiversity	Equivalent policy – the emerging policy combines the previous policies NR3 and NR4.
Policy NR5: Natural and Historic Landscapes	Strategic Policy ONR5: Natural and historic landscapes	Equivalent policy - Emerging policy has a similar purpose
Policy BE1: High Quality Development	Strategic policy OSC4: High Quality Design	Equivalent policy - Emerging policy has a similar purpose

It is noted that nearly all of the relevant development management policies in the Local Plan Strategy have an equivalent in the emerging Local Plan Review however Policy NR1 (countryside management) which represents one of the most fundamental policies to this area has not been included within the emerging Local Plan Review. This policy restricts inappropriate development in the countryside and recognises the countryside as an asset which should be protected. The policy would therefore still be relevant under Strategic Objective and Priority 12 (countryside character) set out in the emerging Local Plan Review. It is recommended that Policy NR1 is retained and included in the emerging Local Plan Review. The policy wording could be strengthened for example to restrict development in the countryside unless it benefits the rural economy or helps to maintain or enhance the landscape character.

3.5 Alternative Policies

There are a number of alternative policies which could be applied instead of an extension to the Green Belt. These include the following and are considered in turn below:

- A green gap policy

- Local green space designation
- Green buffer within strategic site(s)

3.5.1 Green Gap Policy

If the main intention of the proposed new area of Green Belt is to prevent the merging of Lichfield and Fradley then the Council could consider a new policy focused on protecting green gaps. Depending on how critical the gap is deemed to be, this could be a strategic green gap policy or alternatively for less critical gaps, a local green gap policy may be more appropriate.

Neighbouring East Staffordshire Council has a ‘Strategic Green Gap’ policy. As set out in Section 2.2.1 above, Cheshire East Council applied a Strategic Green Gap policy as an alternative to a Green Belt extension around Crewe. Preston City Council have an ‘Area of Separation’ policy which has the same effect. The overarching aim of such policies is to protect the separate identity of settlements, to prevent coalescence, and to retain the existing settlement pattern by maintaining the openness of the land.

The risk is that the policy is untested in Lichfield and could therefore be subject to challenge. Evidence would be required to justify the case for the ‘green gap’ and to define the area to which it applies.

3.5.2 Local Green Space Designation

PPG states that local green space designation is a way to provide special protection against development for green areas of particular importance to local communities. The NPPF at paragraph 100 notes that the green space must be:

“(a) in reasonably close proximity to the community it serves;

(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

(c) local in character and is not an extensive tract of land.”

PPG notes that it should not be used in a way that undermines this aim of plan making and therefore plans must identify sufficient land in suitable locations to meet development needs.

Although this does not represent an alternative for the whole of the proposed area, it could be successfully applied to smaller scale ‘less critical’ gaps where spaces are demonstrably special to the local community in order to offer special protection.

3.5.3 Green Buffer within Strategic Site(s)

A substantial green buffer could be established through policy between strategic sites and adjacent settlements. It is noted that Strategic Policy SHA1 (Strategic housing allocation north of Lichfield) within the Local Plan Review Preferred

Options (November 2019) states the following design principle: “*The development should seek to ensure that there is a clear break between it and the settlement of Fradley to the north.*” The benefit of this approach is that it would be specific to the local circumstances of the strategic site and the gap and would be designed in from the outset. However, the risk is that this would not have any special status which would mean that over time there could be a risk of encroachment. Combining it with a green gap policy would provide stronger protection.

3.6 Conclusion

The proposed area is located in the open countryside where Policy NR1 restricts inappropriate development. A number of other development management policies also apply which assist in directing development to the most sustainable locations according to the settlement hierarchy and which protect specific features within the open countryside (for example, views of Lichfield Cathedral, trees, hedgerows, landscape character etc).

The relevant development management policies were tested through the Watery Lane appeal case which is adjacent to the proposed area of new Green Belt. In this case the policies had been correctly applied to serve their intended purpose and the Secretary of State had concluded the proposal was not in accordance with the Development Plan, however he approved the appeal contrary to the above policies due to other material considerations.

There have been no planning applications within the proposed area in the past two years which have tested these policies and there does not appear to be any development pressure within this area at present. The development management policies applicable to this area have therefore only been tested on one occasion and it is therefore not possible to definitively conclude that they would not be adequate.

It is noted that Policy NR1 (or an equivalent of it) has not been retained in the emerging Local Plan Review. As this policy is the only policy which directly refers to protecting the countryside from inappropriate development, it is recommended that Policy NR1 is retained and included in the emerging Local Plan Review. The policy wording could be strengthened for example to restrict development in the countryside unless it benefits the rural economy or helps to maintain or enhance the landscape character.

There are a number of alternative policy options which the Council could explore instead of an extension to the Green Belt. Whilst none of these would be as highly restrictive as Green Belt policy, they may be able to fulfil the Council’s intended aim. The strongest of these would be a ‘Strategic Green Gap’ policy or something akin to this. This would only be relevant if the Council’s principle aim is to prevent the merging of Lichfield and Fradley.

4 NPPF Paragraph 135 – criterion (b)

4.1 Overview

This section evaluates the case and existing justifications for the proposed new area of Green Belt and considers whether an exceptional circumstances case exists in accordance with the criteria set out in paragraph 135 NPPF.

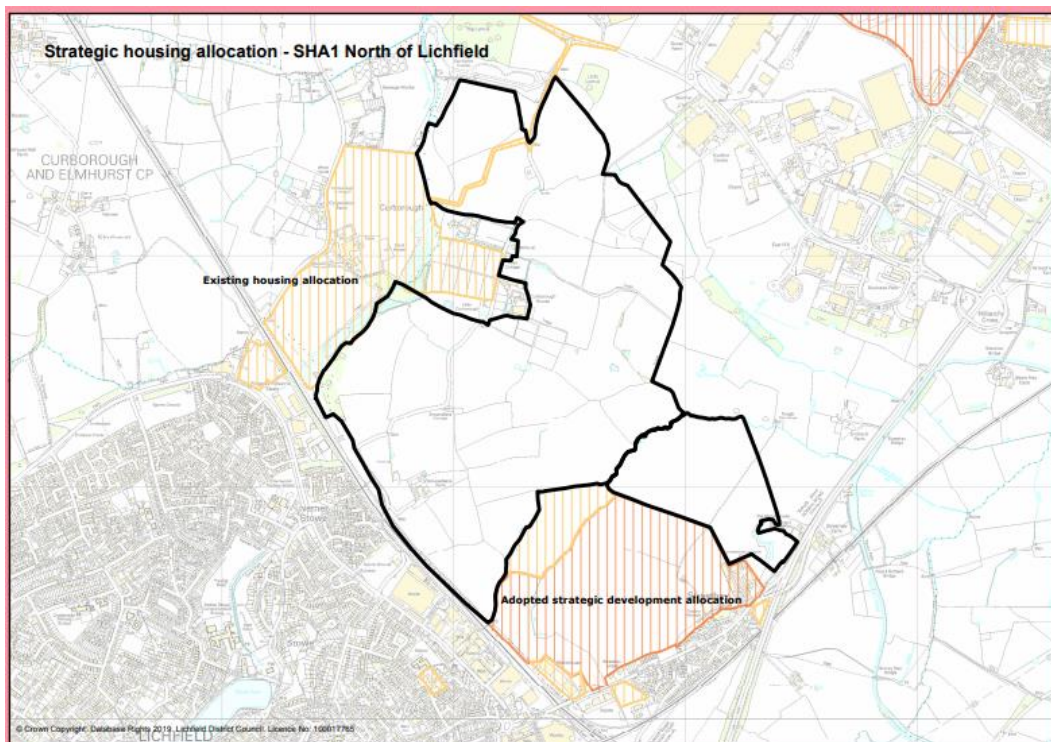
Criterion (b) is as follows: “*set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary.*”

4.2 Major Changes

Paragraph 135 of the NPPF specifically refers to major urban extensions as representing an exceptional circumstance: “*New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.*”

There are a number of major changes resulting from a combination of local authority led growth and development pressure to the north of Lichfield which would amount to exceptional circumstances. The most recent and the most significant of these is the proposed major urban extension to the north of Lichfield, set out in the Local Plan Review Preferred Options document (2017). Strategic Policy SHA1: Strategic housing allocation north of Lichfield allocates land for 3,300 dwellings in order to meet the district’s housing requirement over the plan period. The proposed allocation is shown in Figure 4 below:

Figure 4. Strategic housing allocation SHA1, Local Plan Review Preferred Options



The allocation sits adjacent to the Watery Lane proposal for 750 dwellings which was permitted on appeal. The represents a further major change in circumstances. Whilst there had historically been development pressures within the area around the Watery Lane site, no applications had previously been determined and the granting of permission on appeal was a major change. The site is located in the open countryside and is separated from Lichfield by the West Coast Mainline. The permission was subsequently included within the Local Plan Allocations document (2019) as Site OR7 (Other Rural 7): Land at Watery Lane.

The allocation is also adjacent to the East of Lichfield (Streethay) Strategic Development Allocation (Policy Lichfield 5) as set out in the Local Plan Strategy (2015). This consists of a mixed use allocation of up to 750 dwellings.

The above allocations and appeal decision demonstrate that the development pressures and the growth requirements to the north of Lichfield have increased significantly in recent years and ultimately culminated in the numerous strategic allocations which form a major urban extension. Although the area to the north east of Lichfield is the only part of the City which is not constrained by Green Belt, the allocation of sites in previous years has not been limited to this direction only and has been focused on achieving the most sustainable pattern of development. The Local Plan Strategy (2015) included a number of Strategic Development Allocations to the south of Lichfield (Policy Lichfield 6) for approximately 1350 dwellings falling within an Area of Development Restraint and partly within Green Belt land. The scale of growth around Lichfield City proposed in the emerging Local Plan Review is similar to the Local Plan Strategy however the difference is that it is solely focused to the north of Lichfield.

Given that Lichfield City represents the Strategic Centre within the District and the main focus for sustainable development, development pressure and the need for growth around Lichfield City is to be expected however the requirement for Lichfield to assist in meeting the unmet needs of its neighbouring authorities represents a major change in circumstances. Lichfield forms part of the Greater Birmingham and Black Country Housing Market Area. The examination and adoption of the Birmingham Development Plan showed that there was a significant unmet housing need arising from Birmingham and the wider Housing Market Area (HMA). Paragraph 5.12 of the Local Plan Review Preferred Options states: *“This shortfall will need to be addressed between the authorities and whilst the final distribution of unmet need has not be determined there is an onus on local authorities to address need through the local plan process. Lichfield district is committed to engaging with its neighbours under the duty to cooperate to help to meet the needs within the housing market area.”*

4.3 Conclusion

There have been a number of major changes in circumstances which justify this exceptional measure, these are as follows:

- Local authority led growth to the north of Lichfield - The proposed strategic housing allocation to the north of Lichfield for 3,300 dwellings in order to meet the districts housing requirement over the plan period which represents a major urban extension. Although the proposed scale of growth

around Lichfield City in the emerging Local Plan Review is similar to the previous Local Plan Strategy, it is solely focused to the north of Lichfield in the emerging Local Plan Review.

- Development pressure to the north of Lichfield - The permission for 750 dwellings at Watery Lane which was granted on appeal due to other material considerations despite it being in conflict with the Development Plan.
- Unmet development needs - The requirement for Lichfield to assist in meeting the unmet housing needs of its neighbouring authorities within the HMA which has increased the District's overall housing requirement.

5 NPPF Paragraph 135 – criterion (c)

5.1 Overview

This section evaluates the case and existing justifications for the proposed new area of Green Belt and considers whether an exceptional circumstances case exists in accordance with the criteria set out in paragraph 135 NPPF.

Criterion (c) is as follows: “*show what the consequences of the proposal would be for sustainable development.*”

5.2 Sustainable Development

Lichfield City represents the Strategic Centre within the District and the main focus for sustainable development. The proposed area of new Green Belt excludes the East of Lichfield (Streethay) Strategic Development Allocation (Policy Lichfield 5, Local Plan Strategy 2015), the ‘Land at Watery Lane’ housing allocation (Site OR7, Local Plan Allocation Document 2019) and the strategic housing allocation north of Lichfield (SHA1) from the Preferred Options Local Plan Review. Alongside other existing planning permissions, these allocations will enable the Council to deliver 6,929 dwellings around Lichfield City over the plan period. In accordance with the spatial strategy, this will contribute to enabling the Council to meet the identified housing need within the District over the plan period as well as assisting in meeting the unmet needs arising from the housing market area. The boundary of the proposed area of new Green Belt therefore excludes any land required to meet development needs in the interests of sustainable development.

5.3 Conclusion

The proposed area excludes existing and proposed allocations and sites with planning permission in order to meet identified needs within the plan period in accordance with the spatial strategy set out in the emerging Local Plan Review. The proposed extension to the Green Belt would have no negative consequences for sustainable development.

6 NPPF Paragraph 135 – criterion (d)

6.1 Overview

This section evaluates the case and existing justifications for the proposed new area of Green Belt and considers whether an exceptional circumstances case exists in accordance with the criteria set out in paragraph 135 NPPF.

Criterion (d) is as follows: “*demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining area.*”

6.2 The Necessity for Green Belt

Strategic Policy ONR1 (Green Belt) in the Preferred Options Local Plan Review sets out the main aim and purpose of extending the Green Belt to the north of Lichfield. It states: “*This new Green Belt will define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley.*” Paragraph 16.5 notes that exceptional circumstances exist to identify new Green Belt “*...as part of the planning for the large scale development to the north of the city.*”

In order to determine whether the proposed area to the north of Lichfield is appropriate for designation as Green Belt land, it is necessary to assess whether this area could meet the original purposes of the West Midlands Green Belt and the more localised purposes of the Green Belt at a District level.

The Green Belt around Lichfield forms part of the West Midlands Green Belt which was originally proposed during the 1950s. It is therefore important to consider the original aim and purpose of the Green Belt. It is accepted that at a District level the Green Belt performs a more localised function and therefore an assessment applying the Green Belt assessment methodology (as set out in the Lichfield Green Belt Review (September 2019) (‘the 2019 Green Belt Review’)) has also been applied.

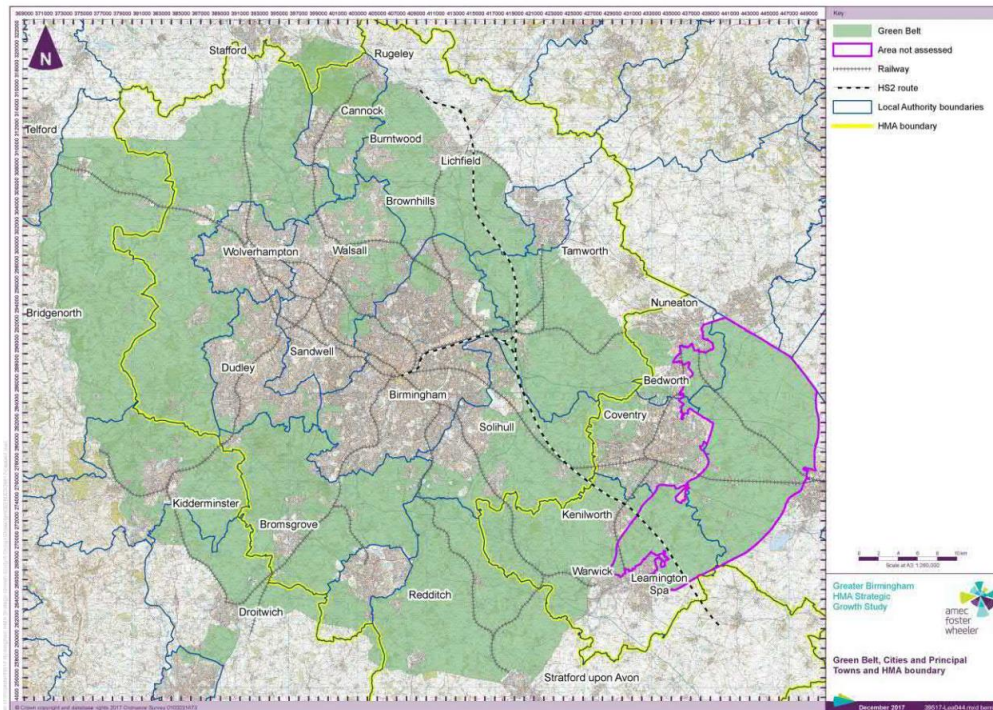
6.2.1 West Midlands Green Belt

Context

The Lichfield District Strategic Green Belt Review 2012 (‘the 2012 Green Belt Review’) and the 2019 Green Belt Review provide further details on the historical context of the Green Belt within Lichfield.

A Green Belt was first proposed within the West Midlands during the 1950’s. The West Midlands Green Belt encircles the main ‘conurbation’ area and encloses Birmingham, Solihull, Walsall, Wolverhampton, Sandwell and Dudley, as shown in Figure 5 below, taken from the Greater Birmingham HMA Strategic Growth Study (2017).

Figure 5. Map showing the West Midlands Green Belt (Source: Greater Birmingham HMA Strategic Growth Study 2017).



The principal reason for establishing a Green Belt in the West Midlands was to prevent the outward expansion of the built-up area of the West Midlands into open countryside and towards the series of freestanding towns and villages surrounding the main West Midlands urban area.

The West Midlands Green Belt extends outwards to the edges of a ring of towns surrounding the conurbation. In Lichfield, Tamworth, Nuneaton, Rugby, Warwick and Leamington, Stratford-upon-Avon, Alcester, Worcester and Stourport, the Green Belt reaches the edge of the town on its conurbation side but does not surround it. As a result, the area to the north east of Lichfield City beyond the West Coast Mainline lies outside of the Green Belt. The West Coast Mainline forms nearly the full extent of the outer boundary of the West Midlands Green Belt within the District.

Assessment

It is clear that the original aim and purpose of the West Midlands Green Belt was to prevent the outward expansion of the West Midlands conurbation into the surrounding countryside and also into the surrounding towns and villages. As the proposed area is located to the north of Lichfield it has no relation to the gap between the conurbation and Lichfield and therefore does not meet the original purpose of the West Midlands Green Belt.

6.2.2 Lichfield District Green Belt Assessment

Context

The 2019 Green Belt Review sets out a methodology to be applied in assessing the Green Belt within the District. This method provides a local interpretation and definitions of the national purposes of Green Belt which are more relevant within a District context.

An assessment of the proposed area of Green Belt has been undertaken applying this methodology. The completed assessment form is provided below. The assessment assumes that the proposed allocations in the emerging Local Plan Review are implemented and therefore the proposed area adjoins Lichfield City to the south.

Assessment

Green Belt land parcel/area name and reference	Proposed Area of New Green Belt		
Description of parcel/area	The proposed area is approximately 363 hectares. The area stretches from the northern edge of Lichfield City towards the south eastern edge of Armitage with Handsacre although it doesn't extend as far as the settlement. The area curves around the north of Lichfield providing separation between Lichfield and Fradley Distribution Park. It curves all the way around Lichfield to join the A38 to the east. The area is bound by the West Coast Mainline railway to the west. To the south, it's boundaries with Lichfield are defined by Watery Lane, a short section of Curborough Brook, the limits of Curborough Sprint Course, Netherstowe Lane, a short section of Mare Brook, and field boundaries. Some sections of the southern boundary are not defined by any physical features on the ground. The northern boundary is defined by the HS2 line. The area consists of open countryside and agricultural land. The only existing uses within the area are a sewage works, Curborough Sprint Course, and some residential properties to the south off of the A38.		
Assessment within Strategic Growth Study	N/A		
NPPF Green Belt purpose	Specific Questions	Assessment	Comments
a) To check the unrestricted sprawl of large built up areas.	1. Does the parcel/area directly abut the outer edge of the large built-up area , or is it very close to it? Is it part of	Yes – Lichfield.	The area directly abuts a large built-up area. The area is adjacent to the large

	<p>a wider group of parcels that directly act to prevent an urban sprawl?</p> <ol style="list-style-type: none"> 2. What is the physical gap between the settlement edge of the parcel and the urban edge of the large built-up area? I.e. is there a broad gap or is the gap narrow? (Smaller parcels only) 3. Would development of the parcel/ area represent an outward extension of the large built-up area? 4. If released from GB could enduring long-term boundaries be established? 5. Is the parcel/area free from development? 6. Does the parcel/area have a sense of openness and would this be compromised by development? (for the purposes of openness, this is defined as having both a visual and spatial aspect, visual openness relates to the perception of openness which may be impacted by topography, views and vegetation whereas spatial openness relates to the level and type of built form) 7. Is the parcel/area well connected to the built up area along a number of boundaries? Could development of the parcel/area be considered to “round off” the pattern of the built up area? 	<p>Area is adjacent to the large built-up area of Lichfield.</p> <p>Yes.</p> <p>Yes – HS2 line.</p> <p>Yes.</p> <p>Yes.</p> <p>No.</p>	<p>built-up area of Lichfield along its southern boundary.</p> <p>Development of the area would represent an outward extension of the large built up area (Lichfield). If released from the Green Belt long term boundaries could be established due to the HS2 line which bounds the area to the north. The area is predominantly free from development and has a sense of openness both in spatial and visual aspects.</p> <p>The area is connected to Lichfield along its southern boundary. Given the shape of the area, development could not be considered to ‘round off’ the settlement.</p>
<p>Assessment (Important, moderate, minor, no)</p>	<p>Important – the area abuts the large built up area of Lichfield. Development of the area would represent an outward expansion of the large built-up area (Lichfield). The area is predominantly free from development and has a sense of openness both in visual and spatial aspects.</p>		
<p>b) To prevent neighbouring towns merging into on another.</p>	<ol style="list-style-type: none"> 1. Does the parcel/area lie directly between two towns and form all or part of a gap between them? Where the parcel/area does form a gap what is the sensitivity and/or integrity of the parcel/area? 2. What distance is the gap between the towns? (where the distance is less than 1km it will be considered important, between 1 and 2km will be considered moderate, more than 2km will be considered as minor) 	<p>Yes.</p> <p>Important – approximately 83m between Lichfield and Fradley.</p>	<p>Area lies between Lichfield and Fradley (to the north east), Lichfield and Armitage with Handsacre (to north west), and Lichfield and Kings Bromley (to the north).</p> <p>The gap between Lichfield and Fradley is approximately 83m. As such, growth of Lichfield to the north east would</p>

	<ol style="list-style-type: none"> 3. Are their intervening settlements or other development on roads that would be affected by release from Green belt? 4. Would development in the parcel/area appear to result in the merging of towns or compromise the separation of towns physically? 5. Does the Green Belt in this parcel/area prevent development that would directly lead to the closure of a gap between settlements? 6. Would the development of the parcel/area be a significant step leading towards coalescence of two settlements? Would development of the parcel/area result in a physical connection between urban areas and settlements, or lead to the danger of a subsequent coalescence between such settlements? 7. Does the Green Belt prevent another settlement being absorbed into the large built up-area? 	<p>No.</p> <p>Yes.</p> <p>Yes.</p> <p>Yes.</p> <p>Yes.</p>	<p>result in the settlements merging. The gap between the settlements consists of the HS2 line and its associated earthworks and therefore this prevents the settlements from merging as it represents a physical constraint to development. The only land which is not constrained by the HS2 line is the triangular area of grassland.</p> <p>The gap between Lichfield and Kings Bromley is approximately 4km. As such growth of Lichfield to the north would reduce the gap between the settlements however the gap is relatively large. The majority of the gap is not located within the Green Belt.</p> <p>The gap between Lichfield and Armitage with Handsacre is approximately 4.1km. As such growth of Lichfield to the north west would reduce the gap between the settlements however the gap is relatively large.</p>
Assessment (Important, moderate, minor, no)	Important – The area lies between Lichfield and Fradley where the gap is approximately 83m. The gap consists of the HS2 line and its associated earthworks and therefore this prevents the settlements from merging as it represents a physical constraint to development. The only land which is not constrained by the HS2 line is a triangular area of grassland between the settlements. Despite the HS2 line being the main reason that merging is prevented, an assessment of important has still been applied due to the close proximity between the settlements.		
c) To assist in safeguarding the countryside from encroachment.	<ol style="list-style-type: none"> 1. Does the parcel/area have the character of open countryside? - What is the nature of the land use in the parcel/area? 2. Is the parcel/area partially enclosed by a town or village built up area? 	<p>Yes.</p> <p>No.</p>	<p>The area consists of open countryside and agricultural land and is therefore open in character. The area is not enclosed by the settlement as it is only</p>

	<ol style="list-style-type: none"> 3. What are the boundary features of the parcel/area with the settlement (if the parcel/area is connected to a settlement) and the boundary features with the countryside? 4. Has the parcel/area already been affected by encroaching development, is there development within the parcel (not including agriculture and forestry developments considered to be appropriate development)? 5. Are there any existing natural or man-made features which would prevent encroachment within or at the edge or the parcel/area? 	<p>Settlement - Roads, brooks, existing development, field boundaries, and no physical features in parts. HS2 line with the countryside. No.</p> <p>Yes – HS2 line.</p>	<p>connected to Lichfield along its southern boundary.</p> <p>The area is free from encroaching development and has the character of countryside.</p> <p>The area's boundaries include roads, brooks and the HS2 line which could assist in preventing encroachment. Some sections of the southern boundary are not defined by any physical features on the ground.</p>
Assessment (Important, moderate, minor, no)	Important - Area has the character of open countryside and is free from urbanising development. The area is not enclosed by existing development.		
d) To preserve the setting and special character of historic towns	<p>Does the parcel/area make a positive contribution to the setting of the historic town? Measured by:</p> <ol style="list-style-type: none"> 1. Is the parcel/area located within or adjacent to a historic town? Where it is not then no further criteria/questions are asked and the parcel is scored as 'no' for this purpose. 2. Can features of the historic town be seen from within the parcel/area? Does the parcel/area have good intervisibility with the core of the historic town? 3. Is the parcel/area in the foreground of views towards the historic town from public places? 4. Is there public access within the parcel/area? 5. Does the parcel/area form part of an historic landscape that is related to an historic town? 	<p>Yes.</p> <p>No.</p> <p>No.</p> <p>No.</p> <p>Yes.</p>	<p>The area is located adjacent to a historic town (Lichfield).</p> <p>The area is not located in close proximity to the historic core of the city and there are limited views towards the city centre and the historic core of the city from within the area. Immediate foreground views are of modern development.</p>
Assessment (Important, moderate, minor, no)	Minor – Site is located adjacent to a historic town (Lichfield). Site is not located in close proximity to the historic core of the city and there is limited intervisibility with the historic core of the city.		

e) To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	All Green Belt makes a strategic contribution to urban regeneration by restricting the amount of greenfield land available for development and encouraging developers to reuse/recycle derelict/urban sites. As such it is not possible to assess whether one parcel/area considered in isolation makes more of a contribution to this purpose. What can be said is that all parcels make an equally significant contribution to this purpose and as such are each scored as 'moderate' as this is the of middle scoring range.	Moderate	All parcels/areas are assessed as providing an equal contribution toward this Green Belt purpose. Given the limited supply of brownfield/derelict land within Lichfield District and the considerable supply across the HMA it is considered the Green Belt as a whole within Lichfield plays a moderate role in encouraging the recycling of derelict land.
Assessment (Important, moderate, minor, no)	Moderate - All parcels/areas to be assessed as moderate		
Overall parcel/area assessment	Important - Assessment records 3/1/1 split with three important categories, therefore the overall assessment is important. The area plays an important role in checking the unrestricted sprawl of the large built-up area of Lichfield, in preventing neighbouring towns from merging and in safeguarding the countryside from encroachment. The area plays a more limited role in other aspects. Whilst the area has been assessed as having an important role in preventing the merging of Lichfield and Fradley it should be noted that the HS2 line fulfils this role and provides a physical constraint which prevents any actual development. Without the HS2 line, the Green Belt in this area would have a more fundamental role to preventing towns from merging.		

6.3 Conclusion

The original aim of the West Midlands Green Belt was to prevent the outward expansion of the West Midlands conurbation into the countryside and the surrounding towns and villages. The proposed area of new Green Belt would not meet this original purpose given its location. Applying the 2019 Green Belt Review method to the proposed area, it would have an overall important role for Green Belt purposes at a District level. This is predominantly due to its important role in checking the unrestricted sprawl of Lichfield and in safeguarding the countryside from encroachment.

Strategic Policy ONR1 (Green Belt) in the Preferred Options Local Plan Review sets out the main aim and purpose of extending the Green Belt to the north of Lichfield. It states: *“This new Green Belt will define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley.”* In terms of coalescence, the strategic housing allocation extends right up to the HS2 line (and its earthworks) and therefore there is no additional land which is at risk of development in this area (apart from a triangular area of grassland). The area between Lichfield and Fradley would be physically constrained from development principally due to the HS2 line, therefore the need for the Green Belt designation to prevent towns from merging in this location is questionable. If the HS2 line is not constructed or if there was a larger gap between the settlements (i.e. a gap between the strategic housing allocation and the HS2 line), a different conclusion could be reached. Excluding the coalescence reason, the only reason for the Green Belt would be to define the northern extent of Lichfield. Given that it would not meet the original purpose of the West Midlands Green Belt, this would not a particularly strong argument.

The benefits of extending the Green Belt to the north of Lichfield would be very localised, predominantly focused on restricting sprawl and safeguarding the countryside in this location however as set out in Section 3 there is no development pressure within this area at present and therefore the necessity for Green Belt is not particularly strong.

Given the proposed extension is located within the middle of the District, it would have no implications for any of the adjoining authorities. East Staffordshire Borough Council is located to the north of the District boundary however there is no Green Belt located to the south of the Borough.

Overall, based on the current extent of the proposed area of new Green Belt it is difficult to demonstrate the necessity for an extension to the Green Belt in this location. If the proposed area were expanded to create a larger gap between Lichfield and Fradley, this could assist in demonstrating the need for Green Belt, particularly relating to preventing coalescence.

7 NPPF Paragraph 135 – criterion (e)

7.1 Overview

This section evaluates the case and existing justifications for the proposed new area of Green Belt and considers whether an exceptional circumstances case exists in accordance with the criteria set out in paragraph 135 NPPF.

Criterion (e) is as follows: “*show how the Green Belt would meet the other objectives of the Framework.*”

7.2 Meeting other Objectives of the Framework

The extent to which this area meets the objectives of the Framework will need to be evaluated within the sustainability appraisal. However, as the ethos of the NPPF is to achieve positive growth and deliver sustainable development through the planning system, rolling-out a restrictive policy tool is unlikely to be considered to achieve positive growth. On the other hand, as set out in Section 5, existing and proposed allocations and sites with planning permission have been excluded from the proposed new area of Green Belt in order to meet identified needs within the plan period in the interests of sustainable development.

In addition, it is likely that there could be benefits pertaining to certain sustainability criteria including protecting the openness of land and the visual character of the landscape, and retaining greenfield land, agricultural land, and green infrastructure.

7.3 Conclusion

It is recommended that this is fully evaluated through the sustainability appraisal.

8 Conclusion and Recommendations

8.1 Conclusion

This technical note has considered whether there is an exceptional circumstances case to justify the expansion of the Green Belt to the north of Lichfield as proposed by Strategic Policy ONR1 of the Preferred Options Local Plan Review. Policy ONR1 states: “*New Green Belt will be identified to the north of Lichfield alongside the strategic development allocation and defined by the line of HS2. This new Green Belt will define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley.*”

Paragraph 135 of the NPPF makes clear that new Green Belts should only be established in exceptional circumstances and sets out a number of criteria which should be met when proposing new Green Belt land. The proposed new area of Green Belt has been assessed against each of these criteria and the conclusions are as follows:

- a) **demonstrate why normal planning and development management policies would not be adequate** - The relevant development management policies were tested through the Watery Lane appeal case. The policies had been correctly applied to serve their intended purpose however the Secretary of State approved the appeal contrary to the Development Plan due to other material considerations. There have been no planning applications within the proposed area in the past two years which have tested these policies and there does not appear to be any development pressure within this area at present. The development management policies applicable to this area have therefore only been tested on one occasion and it is therefore not possible to definitively conclude that they would not be adequate.
- b) **set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary** - There have been a number of major changes in circumstances consisting of local authority led growth to the north of Lichfield (strategic housing allocation SHA1), development pressure to the north of Lichfield (the Watery Lane appeal), and the requirement to meet the unmet housing needs of authorities within the HMA. Although the proposed scale of growth around Lichfield City in the emerging Local Plan Review is similar to the previous Local Plan Strategy, it is solely focused to the north of Lichfield in the emerging Local Plan Review.
- c) **show what the consequences of the proposal would be for sustainable development** - The proposed area of new Green Belt excludes existing and proposed allocations and sites with planning permission in order to meet identified needs within the plan period in accordance with the spatial strategy set out in the emerging Local Plan Review. The proposed extension to the Green Belt would have no negative consequences for sustainable development.

- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas** – The proposed area of new Green Belt would not meet the original aim and purpose of the West Midlands Green Belt. Applying the 2019 Green Belt Review method to the proposed area, it would have an overall important role for Green Belt purposes at a District level and the benefits of the extension would be very localised. One of the key arguments for the proposed new area of Green Belt is to prevent the coalescence of Lichfield and Fradley. The area between Lichfield and Fradley would be physically constrained from development principally due to the HS2 line (and its associated earthworks), therefore the need for the Green Belt designation to prevent towns from merging in this location is questionable. Based on the current extent of the proposed area of new Green Belt it is difficult to demonstrate the necessity for an extension to the Green Belt in this location. If the proposed area were expanded to create a larger gap between Lichfield and Fradley, this could assist in demonstrating the need for Green Belt, particularly relating to preventing coalescence.
- e) show how the Green Belt would meet the other objectives of the Framework** - It is recommended that this is fully evaluated through the sustainability appraisal.

In conclusion, whilst there are clearly a number of major changes in circumstances, it is not possible to definitively demonstrate that normal development management policies are not adequate and that there is a necessity for Green Belt. It is therefore not possible to meet all of the criteria set out in paragraph 135 in order to demonstrate an exceptional circumstances case.

8.2 Recommendation

It is recommended that the Council continues to apply the existing development management policies within the proposed area and monitor any changes in development pressures within the area. It is noted that Policy NR1 (or an equivalent of it) has not been retained in the emerging Local Plan Review. As this policy is the only policy which directly refers to protecting the countryside from inappropriate development, it is recommended that Policy NR1 is retained and included in the emerging Local Plan Review. The policy wording could be strengthened for example to restrict development in the countryside unless it benefits the rural economy or helps to maintain or enhance the landscape character.

If the gap between Lichfield and Fradley is seen as being particularly important, then an alternative policy approach utilising a ‘strategic green gap’ policy could be pursued instead of an extension to the Green Belt. Local authorities with examples of such policies include East Staffordshire Council, Cheshire East Council and Preston Council. However, given the extent of the gap as it currently stands this may not be worthwhile especially as evidence would be required to justify and define the gap and such policies are untested in Lichfield and could be subject to challenge.

If the Council wish to pursue the Green Belt extension further, it is recommended that the boundary of the proposed area is revised in order to increase the gap between Lichfield and Fradley. At present, the proposed area of Green Belt in this location is physically constrained from development due to the HS2 line therefore the Green Belt designation is redundant in terms of preventing towns from merging. A larger gap between Lichfield and Fradley would mean that the Green Belt in this location would serve more of a purpose and this would assist in demonstrating the necessity for the Green Belt.