

DISCLAIMER

This report assesses green belt land in Sandwell against the five purposes set out in the National Planning Policy Framework. It suggests parts of the green belt that are potentially suitable for definition as grey belt land.

This report **does not** identify green belt land that should be built on and **does not** determine whether exceptional circumstances exist to review green belt boundaries.

Before deciding whether green belt land should be built on, the Sandwell Local Plan 2 (2026-2044) will need to:

1. Fully examine all other reasonable options for meeting identified needs for development, including the findings of other relevant studies and evidence such as housing and employment land assessments, infrastructure capacity studies and environmental constraints mapping;
2. If no other reasonable options exist, then determine whether exceptional circumstances mean that green belt boundaries should be altered;
3. Use the recommendations of this report as well as the findings of a robust site assessment process that takes full account of statutory and environmental constraints, including flood risk assessments, Strategic Environmental Assessment (SEA) requirements, Habitats Regulations Assessment (HRA) requirements, heritage considerations and other regulatory obligations, to determine whether any sites within the green belt are suitable, available and deliverable/developable, and therefore capable of being allocated for development; then
4. If any sites are capable of being allocated, use the sequential approach set out in the National Planning Policy Framework (previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations) to prioritise which sites to release for development having regard to the need to promote sustainable patterns of development.

To find out more about the preparation of Sandwell Local Plan 2 (2026-2044) please visit: <https://www.sandwell.gov.uk/localplan2>

You can register for email updates on the preparation of Sandwell Local Plan 2 (2026-2044) and other development plan documents at the webpage:

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Sandwell Green Belt Assessment Study Update

Sandwell Metropolitan Borough Council

Final report

Prepared by LUC

May 2026

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Sandwell Green Belt Assessment

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Chapter 1

Introduction

Assessment scope

1.1 LUC has been commissioned by Sandwell Metropolitan Borough Council (the Council) and the City of Wolverhampton Council to undertake an independent, robust, and transparent assessment of all Green Belt land within Wolverhampton and Sandwell (forming part of the wider Black Country Green Belt). This report provides the assessment findings for Sandwell only; those for Wolverhampton are presented in a separate report.

1.2 This Green Belt review will form part of the key evidence to inform future local plans for both Sandwell and Wolverhampton, as well the emerging West Midlands Combined Authority Spatial Development Strategy (SDS).

1.3 The Council's emerging Local Plan does not propose any release of Green Belt land. However, changes to the National Planning Policy Framework (NPPF) in December 2024 will now require authorities to review Green Belt boundaries if they are unable to meet their identified development needs outside of the Green Belt.

1.4 The December 2024 NPPF also introduced the concept of 'grey belt', and National planning practice guidance (PPG) on the assessment of Green Belt land in order to identify grey belt was published in February 2025. Authorities are required to identify any grey belt land – areas of Green Belt where development is potentially (subject to meeting other tests) not inappropriate - so this assessment methodology responds to that guidance in order to ensure that Wolverhampton and Sandwell's evidence bases with respect to Green Belt remain robust.

1.5 The assessment outputs also provide sufficient detail to be a valuable aid to development management decision-making.

1.6 This study replaces the Black Country Green Belt Study, undertaken by LUC in September 2019, which comprised an assessment of the Green Belt across the metropolitan boroughs of Wolverhampton, Dudley, Sandwell, and Walsall (commonly referred to as the Black Country), as well as the district of South Staffordshire. In addition to reflecting national planning policy changes and the introduction of national guidance on the identification of grey belt, the

study takes into consideration changes on the ground and development approvals that have occurred since 2019, where relevant.

Report Structure

1.7 The report is structured as follows:

- **Chapter 2** sets out the context for the study including the origins of the Black Country Green Belt and relevant planning policy, with particular reference to the recent changes to the NPPF and PPG.
- **Chapter 3** sets out the assessment methodology.
- **Chapter 4** summarises the findings of the assessment of contribution to the Green Belt purposes.
- **Chapter 5** suggests next steps that should be considered, if it is necessary to identify potential development allocations in the Green Belt.
- **Appendix A** provides the contribution assessment, with supporting text, map and aerial view, for each identified parcel of Green Belt land.

Chapter 2

Context

2.1 This chapter sets out the origins of the Green Belt in the West Midlands and the relevant national and local Green Belt planning policy context.

Origins of the West Midlands Green Belt

2.2 Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955. The Green Belt was not formally approved by the Secretary of State until 1975. Today, the Green Belt covers almost 900 square miles, surrounding the Black Country, Coventry, Birmingham, and Solihull, with its edge lying between 6 and 15 miles from the built-up area of the conurbation. Sandwell currently has a Green Belt amounting to 820 ha, which amounts to 9.6% of the local authority area [\[see reference 1\]](#).

2.3 The Green Belt has remained relatively successful in checking the sprawl of Birmingham, the City of Wolverhampton, and Coventry, preventing the merging of settlements and encroachment into the surrounding countryside, helping to preserve the setting and special character of the constellation of satellite settlements that inhabit it. At a strategic level, the Green Belt, tightly drawn around settlements, has helped to encourage regeneration by directing development to brownfield sites within the major urban areas.

2.4 The Black Country Green Belt comprises a narrow fringe of countryside within its boundaries to the north, south, and west of the urban area (with more extensive areas of Green Belt lying beyond to the north and west in South Staffordshire), and larger areas within the eastern part of Walsall Borough. There is also a network of green wedges and corridors which are designed as Green Belt, and act to bring the countryside into the heart of the built-up area.

2.5 The last Black Country Green Belt review was undertaken by LUC in September 2019, incorporating the metropolitan boroughs of Wolverhampton, Dudley, Sandwell, and Walsall, as well as the district of South Staffordshire. The study formed an important piece of evidence for the partial review of the Black Country Core Strategy (the Black Country Plan), and the strategic site allocations and individual development plans of the Black Country Authorities and South Staffordshire.

2.6 The Black Country Plan (BCP) aimed to outline housing and employment land allocations up to 2039. However, in October 2022, Dudley Council

withdrew from the BCP, following public consultation and a large number of responses expressing opposition to the plan's proposed housing allocations. This decision led to the dissolution of the joint plan, prompting each council to pursue individual local plans.

National Green Belt policy

2.7 Government policy on the Green Belt and grey belt is set out in chapter 13 of the NPPF 'Protecting Green Belt Land' [\[See reference 2\]](#).

Aims and purposes

2.8 Paragraph 142 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'.

2.9 This is elaborated on in NPPF paragraph 143, which states that Green Belts serve five purposes, as set out below:

- 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.

2.10 The NPPF explains that development in the Green Belt is inappropriate unless covered by one of the exceptions set out in paragraphs 154-155 (see Glossary), and that inappropriate development is by definition harmful to the Green Belt. Paragraph 153 states that, when considering planning applications, 'substantial weight' should be given to any harm to the Green Belt, including harm to its openness.

Exceptional circumstances

2.11 The NPPF 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.’

2.12 Paragraph 146 goes on to state that ‘where an authority cannot meet its identified need for homes, commercial or other development through other means...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.’

2.13 Paragraph 147 states that authorities must examine fully all other reasonable options for meeting its identified need for development before exceptional circumstances can be demonstrated. Notable reasonable alternatives include:

- ‘making as much use as possible of suitable brownfield sites and underutilised land;
- optimise 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
- discuss with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.’

2.14 Paragraph 148 states that ‘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.’

Grey belt

2.15 As noted above, the NPPF indicates that, after considering previously developed land, grey belt land should be prioritised for release in order to meet

development need. The NPPF's policies regarding development proposals in the Green Belt also indicate, at paragraph 155, that development will not be inappropriate if it would utilise grey belt land, as long as:

- It would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- There is a demonstrable unmet need for the type of development proposed;
- The development would be in a sustainable location (with particular reference to NPPF paragraphs 110 and 115); and
- The development would, where applicable, meet the 'Golden Rules' set out in NPPF paragraphs 156-157.

2.16 The concept of 'grey belt' was only introduced into the NPPF in December 2024. It is defined in Annex 2 of the NPPF 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.'

2.17 The definition of grey belt is important because one of the main purposes of the Green Belt assessment will be to determine the extent to which land within the Green Belt contributes to the purposes (a-e) set out at paragraph 143 of NPPG. In turn, this will then identify grey belt land that does not make a strong contribution to purposes (a), (b) or (d).

2.18 With regard to development proposals, if these are on previously developed land (PDL) or grey belt, and are not inappropriate development, substantial weight does not need to be given to any harm to the Green Belt, including to its openness [\[See reference 3\]](#).

Consultation on revised NPPF

2.19 In December 2025, the Ministry of Housing, Communities and Local Government (MHCLG) published a wide range of proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. A consultation on these reforms ran until the 10th of March 2026. MHCLG is now considering the consultation responses following which it will publish a new version of the NPPF, expected later in 2026.

2.20 The proposed reforms do not introduce any changes that would affect the Green Belt contribution assessment methodology set out in this report.

However, they do propose an amendment to the definition of 'grey belt', removing the requirement to consider NPPF footnote 7 constraints (other than Green Belt). Should this change be implemented, it would remove the need to classify certain areas in the Green Belt Study as 'provisional' grey belt pending further assessment of whether development would have a significant impact on footnote 7 areas or assets.

2.21 Importantly, if this change does go ahead, it would not negate the need to consider the impact of specific development proposals on footnote 7 areas and assets alongside wider sustainability considerations, rather it only removes the need to do so as part of the process of defining grey belt. Therefore conclusions made in this report, with respect to individual parcel assessments, are not anticipated to change. The guidance note describing the proposed NPPF changes states that the revised definition "seeks to enable grey belt to be identified with greater certainty, whilst continuing to ensure that these areas receive the same level of protection as elsewhere in the Framework."

2.22 Other proposed changes in the NPPF relating to the Green Belt, whilst not changing the Green Belt contribution assessment methodology set out in this report, if implemented may require consideration during the plan-making and decision-making processes. This includes the approach to housing and mixed-use development around stations defined as 'well-connected' and the application of 'golden rules'.

National Green Belt Planning Practice Guidance

2.23 The NPPF's Green Belt policies are supplemented by Planning Practice Guidance [See reference 4] (PPG, February 2025) on Green Belt planning and how to assess Green Belt land. This section of PPG was substantially re-written in February 2025 and now sets out a detailed methodology for undertaking Green Belt assessments, and how to identify grey belt land, that the Sandwell Green Belt Assessment needs to follow. This is particularly relevant to the methodology of this study.

2.24 The PPG makes it clear that strategic or local planning authorities, or appropriate groups of local planning authorities, should produce a Green Belt assessment during the preparation or updating of all Local Plans, and Spatial Development Strategies that set the strategic context for the release of land - where this would be required to meet development needs.

2.25 The PPG sets out the key steps in a Green Belt assessment, which include:

- defining the location and scale of the assessment area;
- evaluating contribution to the Green Belt purposes;
- considering areas and assets lists in NPPF footnote 7;
- identifying grey belt land; and
- determining if proposals would fundamentally undermine the five Green Belt purposes (taken together) of remaining Green Belt in the plan area.

2.26 Key points in the guidance relating to the assessment of contribution to the Green Belt purposes are summarised below. The PPG goes on to address the sustainability of development and meeting the ‘Golden Rules’, both of which are relevant to determining whether development would be inappropriate, but these are considerations that lie outside of the scope of this Green Belt Assessment.

Assessing Green Belt land to identify grey belt land

2.27 Authorities must identify grey belt land as part of the necessary review and alteration of Green Belt boundaries, in order to:

- suitably prioritise sustainable grey belt for any proposals for development allocations in the Green Belt over other Green Belt locations, in line with NPPF paragraphs 147 & 148, through the plan-making process, and
- help determine planning applications on Green Belt land in line with NPPF paragraph 155.

2.28 Importantly, the guidance is clear 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 area’s adopted Plan and the NPPF’ (PPG Paragraph: 001 Reference ID: 64-001-20250225), including whether:

- development is sustainably located;
- whether it would meet the ‘Golden Rules’ contribution (where applicable); and

- whether there is a demonstrable unmet need for the type of development proposed.

2.29 The principle of sustainability will necessarily also guide the strategic approach to development, both inside and outside of the Green Belt, and inform the assessment of land allocation options during plan-making, in accordance with the principles set out in the NPPF.

The appropriate scale of Green Belt assessments

2.30 Authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances. Local circumstances may dictate, for example, the need for smaller assessment areas in areas where there is greater variation in contribution to the Green Belt purposes, or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors.

2.31 Villages should not be defined as large built-up areas, towns or historic towns. Where there are no historic towns in or adjacent to a plan area, it may not be necessary to provide detailed assessments against Purpose D.

Grey belt assessment criteria

2.32 The PPG sets out illustrative criteria that should be considered when assessing the contribution of land to Green Belt Purposes A, B and D. These are detailed in Chapter 3 below, where it is shown how they have informed the assessment methodology for this study.

Applying NPPF footnote 7 to the definition of Grey belt land

2.33 Grey belt land cannot be defined on Green Belt land covered by or affecting other NPPF footnote 7 designations where that designation 'would provide a strong reason for refusing and restricting development'. In such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225). The NPPF footnote 7 designations are outlined in paragraph 3.21 below.

Assessing the impact of Green Belt release or development on the remaining Green Belt in the Plan area

2.34 The PPG states that a Green Belt assessment should consider the impact of release or development of any Green Belt land, not only grey belt land, and requires consideration of fundamental impact to all five Green Belt purposes (taken together) to all remaining Green Belt across the plan area as a whole.

2.35 Such Green Belt locations should only be discounted for release or development where they 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' (PPG Paragraph: 008 Reference ID: 64-008-20250225).

Identifying sustainable locations in a Green Belt

2.36 Irrespective of the outcomes of reviewing Green Belt boundaries, when determining applications in the Green Belt or identifying appropriate locations for development in a Local Plan, the need to promote sustainable patterns of development is essential, as set out in paragraph 11 sections (a) and (d) (ii) of the NPPF. These principles should determine whether a site's location would be appropriate for the kind of development proposed. Consequently, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate

2.37 The sustainability of specific locations should be determined in light of local context and site or development-specific considerations. Thus, in plan making, the fit of locations with the principles of sustainability will take into consideration factors such as: local geography; infrastructure and connectivity; the specific settlements characteristics and function; climate change; effective use of land; and other relevant constraints and opportunities, including the natural and built environment, physical characteristics, legal covenants, and opportunities for environmental improvement. Furthermore, authorities are required to seek to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.

Impact of development on the openness of the Green Belt

2.38 2.40 PPG Paragraph: 013 Reference ID: 64-013-20250225 sets out factors that can be considered in assessing the potential impact of development on the openness of the Green Belt. It states that, where necessary, assessments of

the impact of proposals on the openness of the Green Belt must be tailored to the circumstances of the case and may include consideration of a proposals:

- spatial volume, i.e. impact on spatial openness;
- visual impact, i.e. impact on visual openness;
- the duration of development, and its remendability; and,
- the degree of activity, such as traffic generation.

2.39 Although relating to development proposals, this guidance can help inform judgements relating to the impact that existing development has on Green Belt openness, which is one of the factors that needs to be considered when assessing contribution to the Green Belt purposes

Local Green Belt policy

Sandwell Green Belt Policy

2.40 Following its departure from the Black Country Plan, Sandwell Metropolitan Borough Council initiated the development of its own Local Plan. The document was submitted to the Planning Inspectorate in December 2024 and is currently in its examination period. The Sandwell Local Plan (SLP) [\[See reference 5\]](#) will replace:

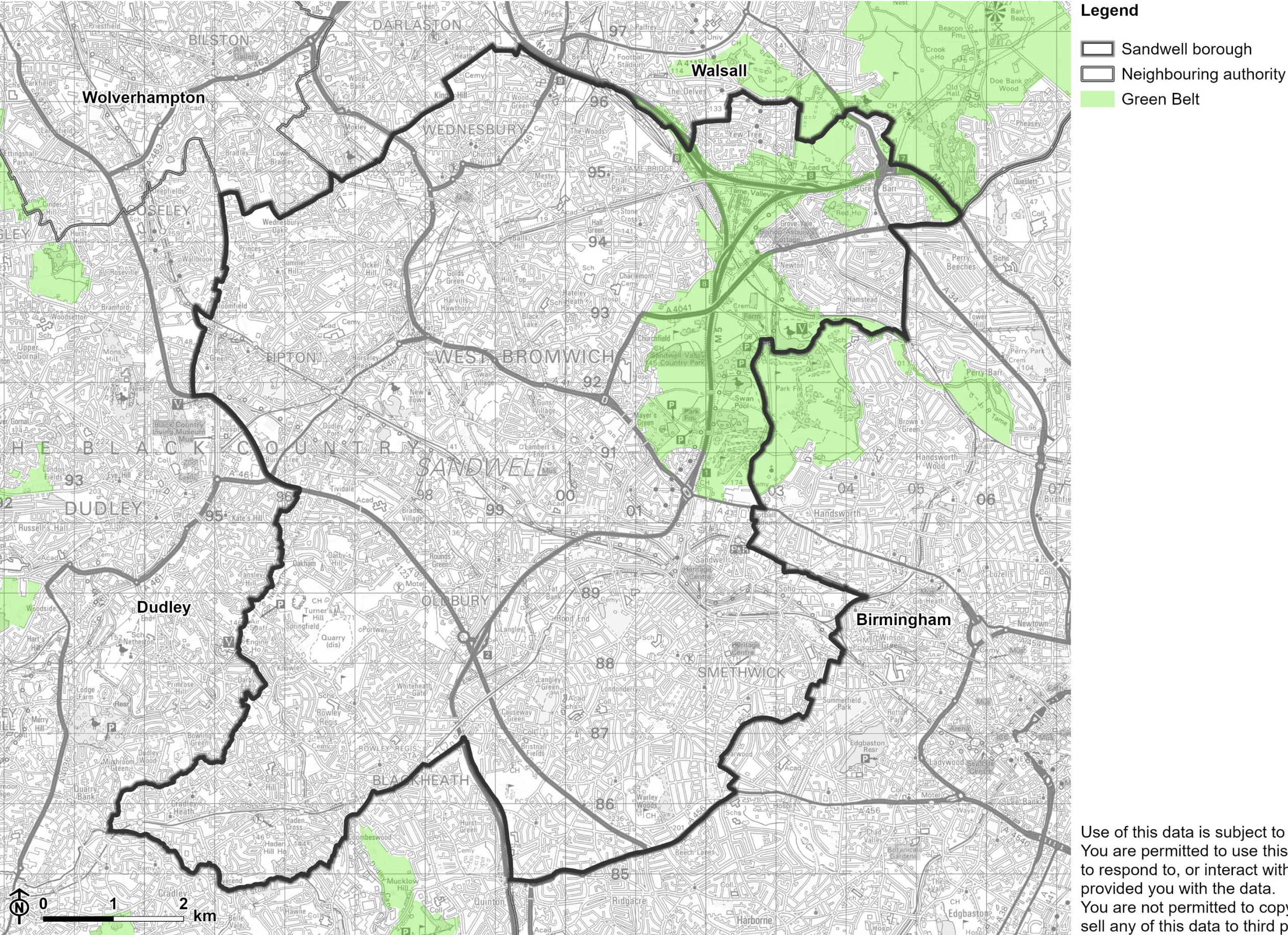
- Black Country Core Strategy (BCCS, 2011)
- Sandwell Site Allocations and Delivery development Plan (2012)
- West Bromwich, Smethwick and Tipton Area Action Plans (2008-2012).

2.41 The SLP (2025) references Green Belt policy within Policy SDS7 – Sandwell’s Green Belt. The policy states that Sandwell will maintain ‘a defensible boundary around the Sandwell green belt’. Justification is provided for this policy, referencing the importance of ‘ongoing protection of the Black Country Green Belt, whose boundary is drawn tightly around parts of its urban edges, and which encompasses some of the most sensitive and important tracts of green and open space in the borough’.

2.42 It also references Green Belt in Policy SDS1 – Spatial Strategy for Sandwell. The policy sets out that growth should be sustainable, and should ‘protect the openness, integrity, and function of the Sandwell Green Belt by resisting inappropriate development, except in very special circumstances’.

2.43 The context of Sandwell's Green Belt is illustrated in Figure 2.1.

Figure 2.1: Sandwell Green Belt Context



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Chapter 3

Assessment methodology

3.1 This chapter sets out the proposed methodology for the Sandwell Green Belt assessment, with reference to key planning policy, practice guidance and case law. The February 2025 PPG (outlined above in Chapter 2) is particularly relevant to this method statement.

General approach

3.2 The study assesses and presents the contribution that identified parcels of land make to each of the five purposes of the Green Belt (A to E). Contribution to Purposes C and E are not relevant to the identification of grey belt but Purpose C in particular is still an important consideration in planning decisions related to the Green Belt, particularly in scenarios involving the potential release or development of Green Belt land that is not defined as grey belt land.

3.3 Having assessed contribution to the Green Belt purposes, conclusions are drawn on any potential for development to fundamentally undermine these purposes across the plan area as a whole.

Relationship with previous Green Belt study

3.4 Fundamentally there is little change from the 2019 Black Country Green Belt Review in terms of the factors that need to be considered to determine contribution to the Green Belt Purposes, but the way in which these are presented has changed. The PPG uses terminology which is open to different interpretations, so our methodology clearly sets out our definition of key terms.

3.5 The PPG focuses on assessing the 'contribution' land makes to the Green Belt Purposes, whereas the 2019 study comprised a Stage 1 assessment of 'contribution', followed by a Stage 2 assessment of 'harm'. Although the term 'contribution' is used in the NPPF and PPG, the illustrative features of rating grades listed in the latter (as set out in the previous chapter) suggest that the consideration of impact of development (or the harm) is a key element of the assessment.

The location and scale of assessment areas

3.6 The PPG states that local planning authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances. Local circumstances may dictate, for example, the need for smaller assessment areas in areas where there is greater variation in contribution to the Green Belt purposes.

3.7 This study encompasses all of the Green Belt in Sandwell. LUC's approach to parcelling of this Green Belt is such that parcels have not been predefined but instead have resulted from an analysis process to identify variations in contribution to the purposes, with areas being subsequently defined to reflect those variations. As such, the defined assessment areas form part of the final product of the assessment, reflecting and responsive to the range of variations in contribution to the Green Belt purposes. This is an approach that LUC has successfully used in all its recent Green Belt assessments and has been considered robust by inspectors at Local Plan Examinations.

3.8 The benefits of this approach are that:

- it avoids misleading results where predefined areas have variations in contribution within a parcel that are averaged out.
- it enables the Council to overlay potential development sites/locations over the findings of the Green Belt assessment to get a clear understanding of the contribution they make to the Green Belt purposes without the need for further evaluation (unless the sites are less than the minimum parcel size identified – see below for further information on the granularity of the assessment).

3.9 Areas will vary in size depending on the range of factors (within and in their immediate vicinity) affecting their contribution. For example, parcels closer to urban areas are likely to be subject to a greater range of factors influencing their contribution compared to more remote areas in the open countryside, resulting in smaller parcels at urban edges and larger ones in the open countryside.

3.10 Parcel boundaries typically follow readily recognisable physical features, including natural features such as waterways and water bodies, woodlands and topographical features, and manmade features such as roads and railway lines and field boundaries) where possible. However, their geographic extent is ultimately determined by performance against Green Belt purposes.

3.11 The granularity of the study, in terms of the resultant number of identified assessment parcels, has been influenced by the rating scale and by the defined minimum parcel size described below.

3.12 A similar approach was adopted for the 2019 Green Belt Review, but methodological adjustments in light of the updates to the PPG may result in some changes to parcel boundaries from those previously identified. Some parcel boundaries may also need to be amended in the light of developments that have come forward since the 2019 study was undertaken.

Rating scale

3.13 The PPG is not prescriptive in terms of the definition of rating scales but, for the purposes of identifying grey belt land, it provides illustrative examples of features which would characterise ‘strong’, ‘moderate’ and ‘weak/no’ levels of contribution to the relevant Green Belt purposes (A, B and D). Land which makes a strong contribution rating to one or more of these purposes does not meet the definition of grey belt.

3.14 This study has used a four-point scale, with an additional ‘very strong’ level of contribution. This is in recognition of the fact that grey belt locations alone might not be sufficient to meet development needs, and/or might not be the most sustainable development options.

3.15 Even where grey belt areas are defined through the study, a plan area’s growth needs, other locationally specific development requirements, the need for development to be in sustainable locations, and the specific constraints and opportunities of sites, may still require consideration of the release of Green Belt land that does not meet the grey belt definition. Therefore, Green Belt purposes C and E must also be rated.

3.16 The release and/or development of land or sites not identified as grey belt may be harder to justify, but NPPF paragraph 148 makes it clear that more sustainable greenfield sites around sustainable transport nodes (such as railway stations) on higher-performing Green Belt land can still be considered for allocation or permission where Exceptional or Very Special Circumstances are demonstrated to apply.

Minimum parcel size

3.17 The number of parcels which have resulted from the analysis process has also been influenced by setting a minimum parcel size. The larger the minimum parcel size, the greater the likelihood that smaller areas may exist within a parcel that perform more weakly in relation to one or more of the Green Belt purposes than the parcel as a whole.

3.18 In order to maximise the usefulness of the outputs useful for development management purposes, and to reduce the likelihood of more localised variations in Green Belt contribution being identified at a later stage, the minimum parcel size for the assessment has been defined as one hectare.

3.19 This enables the Council to overlay potential strategic development sites over the findings of the Green Belt assessment to get a clear understanding of the contribution they make to the Green Belt purposes without the need for further evaluation (unless the sites are less than one hectare in size – see below for further information on the granularity of the assessment). It ensures that the Council can have confidence that the findings of the Green Belt assessment are applicable to all sites / locations of one hectare or more.

NPPF footnote 7 areas and assets

3.20 The Government's definition of grey belt land '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.' The PPG states in such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225).

3.21 Footnote 7 states 'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitat sites [\[See reference 6\]](#) (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets [\[See reference 7\]](#) (and other heritage assets of archaeological interest referred to in footnote 75 [\[See reference 8\]](#)); and areas at risk of flooding or coastal change.'

3.22 There are a number of policy designations listed at Footnote 7 that relate to the assessment of the Sandwell Green Belt, including:

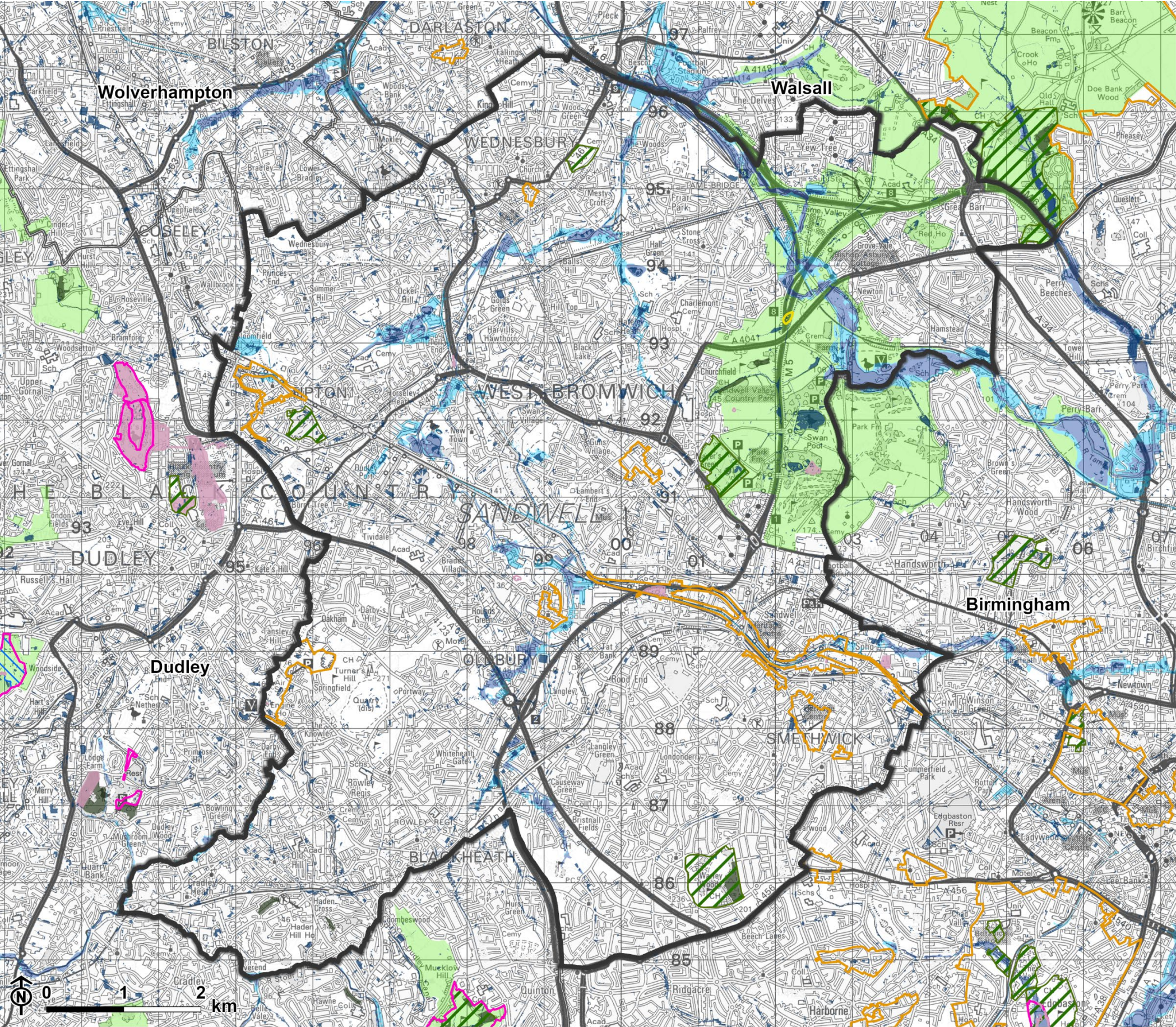
- Irreplaceable habitats, including Ancient Woodland [\[See reference 9\]](#);
- Scheduled Monuments;
- Registered Parks and Gardens;
- Conservation Areas;
- Listed Buildings; and
- Flood risk areas – including Flood Zones 2 and 3, surface water and ground water flood risk areas.

3.23 In light of the PPG, these areas and assets have not been excluded from assessment, but their location and extent have been mapped alongside the findings of the Green Belt contribution assessment (see Figure 3.1).

3.24 All land identified in this study as grey belt should only provisionally be considered as such, pending confirmation (outside the scope of this assessment) that footnote 7 areas or assets do not provide a strong reason to limit development. This is most likely to apply to Green Belt land that does not contribute strongly to Green Belt purposes A, B and D and overlaps with these footnote 7 areas and assets, but policies relating to footnote 7 areas/assets could in some instances also have an impact on the suitability of development on land outside of the defined designations (for example, the settings of heritage assets). Further detailed work would need to be undertaken by local planning authorities (as necessary through the plan-making and development management processes) to establish the effects of more detailed specific proposals on them.

3.25 Mapped areas at risk of flooding are confined to Flood Zones 2 and 3 on the basis that additional areas of surface water or groundwater flooding outside of these flood zones are not mapped at a sufficiently granular and consistent scale across the study area to be useful to the definition of grey belt land at a strategic scale. The impact of prospective development sites on additional areas of surface water or groundwater flooding (outside of flood zones 2 and 3) will be considered in greater detail at a later stage through site allocation and/or development management processes.

Figure 3.1: NPPF Footnote 7 Designations



Legend

- Sandwell borough
- Neighbouring authority
- Green Belt

NPPF Footnote 7 designations

- Special Area of Conservation
- Site of Special Scientific Interest
- Ancient woodland
- Lowland fens
- Peaty soil
- Conservation area
- Scheduled monument
- Registered Parks and Gardens
- High risk of surface water flooding
- Flood zone 2
- Flood zone 3

NPPF Footnote 7 designations:
NPPF Footnote 7 designations not listed and mapped in this figure are generally not located within Sandwell borough or local data sets were not readily available. Listed Buildings, although these are a Footnote 7 designation, have not been included to improve legibility. The locations of these assets are illustrated on the detailed proforma maps in Appendix A. These assets may provide a strong reason for refusing or restricting development and should therefore be reviewed separately.

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Previously developed land

3.26 The 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.’ The definition makes it clear that only previously developed land (PDL) that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land, i.e. that PDL in isolation is insufficient justification to define Green Belt land as grey belt. This is supported by recent appeal decisions directly relevant to the matter [\[See reference 10\]](#).

3.27 The NPPF glossary defines Previously Developed Land (PDL) as ‘Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.’

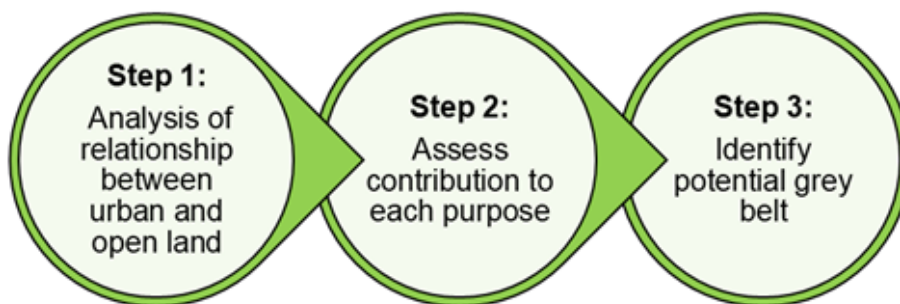
3.28 The majority of significant (larger than one hectare) activities and land uses that qualify for definition as PDL will likely be defined as making less than a strong contribution to Green Belt purposes A, B and D (by virtue of their urbanising influence and/or effect on the openness of the Green Belt) and therefore fall within defined grey belt locations through the strategic assessment process. Some PDL such as large areas of fixed surface infrastructure may in certain locations maintain a strong sense of openness such that they make a strong contribution to Green Belt purposes A, B or D and are not eligible for definition as grey belt land.

3.29 PDL and grey belt at a scale less than one hectare in area has not been identified through this strategic assessment. More detailed assessment for allocation through the plan-making process and/or development through the planning application process may therefore be required.

Parcel assessment process

3.30 A flow diagram illustrating the steps in defining and assessing Green Belt parcels is shown in Figure 3.2.

Figure 3.2: Stages of the parcel assessment process



Step 1: Analysis of relationship between urban and open land

3.31 Working outwards from each inset settlement edge, the analysis process identified variations in the relationship between urban and open land. A series of paragraphs, under the heading 'description', sets out these findings in a consistent manner for each identified parcel:

- The first paragraph comments on boundary features between the urban area and the parcel, giving an indication of their strength. Features such as woodlands, major roads and rivers would typically be considered strong boundary features, and consistency of a distinctive boundary feature over distance also adds to its strength. Where a parcel does not lie directly adjacent to an urban area there may be a number of 'layers' of boundary feature to consider. Hedgerows (unless containing a strong component of mature trees), garden fence-lines or minor roads (unless combined with strong hedgerows) are considered weak boundaries.
- The second paragraph notes any changes in landform which strengthen the sense of separation from the urban area. A sharp change in slope or crossing of a ridgeline are examples of changes in landform which would significantly increase sense of separation from an urban area.
- The third paragraph summarises the degree of urbanising influence from defined urban areas, taking into consideration the above plus any other

relevant factors, such as the scale of development in the settlement and the distance between the parcel and the settlement edge.

- The fourth paragraph comments on the extent of development and/or activity in the Green Belt that would increase urbanising influence. Locations above the minimum parcel size (1ha) which lack openness, and therefore make no contribution to the Green Belt purposes, are noted. These would generally be considered previously developed land (PDL), but there are also areas of land meeting the definition of 'previously developed' that still retain some openness and therefore still perform a role in relation to one or more of the Green Belt purposes. The NPPF's definition of grey belt makes it clear that only PDL that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land (this is supported by recent case law [\[See reference 11\]](#)).
- The final paragraph notes the relationship between the parcel and the wider Green Belt, with reference to visual connectivity and the role of natural or built features in limiting this relationship.

3.32 Overlaying lines that mark variations in the overall strength of relationship with urban areas, together with consideration of variations in the relevance of each Green Belt purpose, will result in the definition of parcels which each make a consistent level of contribution to each assessed Green Belt purpose.

3.33 The paragraphs below identify the factors relevant to the assessment of each of the Green Belt purposes and detail the assessment outputs specific to each purpose.

Step 2: Assess contribution to each purpose

Purpose A – to check the unrestricted sprawl of large built-up areas

Grey belt PPG for Purpose A

3.34 The following features in combination are identified as being illustrative of a '**strong**' contribution:

- Absence of existing development.
- Proximity to a large built-up area.

- Lack of physical features in reasonable proximity that could restrict and contain development.
- A location which, if developed, would form an incongruous pattern in relation to the large built-up area.

3.35 The presence of one or more of the following features, in addition to being near to a large built-up area, is identified as being illustrative of a **‘moderate’** contribution to Purpose A:

- Presence of, or containment by, development such that any new development would not result in an incongruous pattern of development.
- Being subject to other urbanising influences.
- Having physical feature(s) in reasonable proximity that could restrict and contain development.

3.36 Either lack of proximity to a large built-up area or the presence of, or containment by, significant existing development (such as a village or isolated area of development) is identified as being illustrative of a **‘weak/no’** contribution to Purpose A.

Purpose A definitions

3.37 The PPG uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

‘Large built-up area’

3.38 The PPG states that ‘villages should not be considered large built-up areas’ (PPG Paragraph: 005 Reference ID: 64-005-20250225). The implication of this is that towns and cities are large built-up areas.

3.39 Within Sandwell, the definition of large built-up areas has been informed by SLP Policy SCE1 – Sandwell’s Centres. This defines West Bromwich as the strategic centre of Sandwell. Town centres (tier two) are identified as Bearwood, Blackheath, Cape Hill, Cradley Heath, Great Bridge, Oldbury, and Wednesbury. These are all parts of the West Midlands Conurbation and have no Green Belt separation, and so for the purposes of Green Belt assessment, are considered a single large built-up area. To the south of the Green Belt, Birmingham is contiguous with the urban area in Sandwell and so is considered part of the same large, built-up area (the West Midlands Conurbation).

‘Near to’

3.40 Purpose A is relevant to land which is ‘adjacent or near to’ a large built-up area. The extent to which land in the vicinity of a large built-up area relates to it is a question of judgement based on a range of factors including:

- Distance proportional to the size and proximity of large built-up areas.
- Features that create a sense of physical and/or visual separation.
- Features that weaken the sense of separation through physical and/or visual connection.
- Urbanising development and activity within the Green Belt.

3.41 Although villages are not large built-up areas, villages or other urban developments that lack significant separation from, or are relatively close to, a large built-up area as a result of one or more of the factors outlined above are considered to be ‘near to’ a large built-up area. Land between such a settlement (which can be termed a ‘satellite’) and the large built-up area, as defined above, will contribute to Purpose A. Where the gap between a satellite and the large built-up area is very fragile, expansion of the satellite away from the large built-up area would also be considered sprawl associated with the large built-up area.

3.42 The point beyond which Green Belt land is not considered to be ‘near to’ a large built-up area is where development, whether it be the expansion of existing villages or the creation of new settlements, would be sufficiently distinct from the large built-up area as to not be perceived as sprawl associated with it.

‘Free of existing development’

3.43 ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law [\[See reference 12\]](#) generally considers does not affect the openness of the Green Belt.

3.44 ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

‘Physical features in reasonable proximity...that could restrict and contain development’

3.45 Many features could be considered to define the edge of a developed area, including features created in association with new development, but the concept of ‘restricting’ and ‘containing’ development is considered to relate to the extent to which new development would be prevented from having an urbanising influence on land immediately beyond by intervening physical features.

3.46 Urbanising influence (defined under the header ‘other urbanising influences’ directly below) is one of the factors identified in the PPG as being indicative of a ‘moderate’ contribution to Purpose A. If adjacent land which currently makes a ‘strong’ contribution to Purpose A would, as a result of increased urbanising influence, make a weaker contribution, such that it became grey belt, then physical features would not be deemed to ‘restrict and contain’ development.

3.47 For the purposes of a strategic assessment of existing Green Belt land, this judgement is based on existing physical features in reasonable proximity of existing urban areas, without consideration of potential strengthening of boundaries that could be associated with particular development proposals. Physical features that restrict and contain development would typically be:

- strong natural landscape elements such as woodlands or changes in topography, which limit views or create a stronger sense of separation between urban and open land; or
- natural or manmade features that present a physical barrier to movement, and which have some visual screening role, such as tree-lined rivers or canals, motorways and railway lines with embankments, or main roads with strong boundary vegetation.

3.48 Such features are not considered to restrict and contain development if they emanate out from a large built-up area.

3.49 As assessment parcels are defined to reflect variations in contribution to the Green Belt purposes, physical features that restrict and contain development are typically parcel boundaries. Where this is the case, they are judged to be in reasonable proximity. The question of the extent to which a physical feature that is some distance away would limit impact on undeveloped Green Belt land is more likely to arise when harm of the release of a specific site is being addressed.

‘Enclosed by existing development’ (‘partially’ or ‘largely’)

3.50 The extent to which land can be considered to be enclosed by development is a judgement which depends on the strength of the existing development’s urbanising influence on neighbouring Green Belt land and the strength of the neighbouring Green Belt land’s physical and/or visual relationship with the wider countryside.

3.51 The greater the proportion of a defined Green Belt area’s boundary that adjoins urban development (whether that is inset from the Green Belt or washed-over by it) the greater its enclosure. Strong urban edge boundary features which limit urbanising influence can limit a sense of enclosure or containment by adjoining development, as long as there is some sense of connectivity with the wider countryside. Conversely, a lack of physical and visual connectivity with the wider countryside can increase the sense of enclosure, even if urban development around a Green Belt area is not strongly visible.

‘Other urbanising influences’

3.52 Separate to the consideration of existing development within the Green Belt, ‘other urbanising influences’ could be land use or activity without development which is generally associated with urban areas, or it could be an urbanising influence from adjacent development, either inset within the Green Belt or outside but adjacent to Green Belt land.

3.53 The PPG refers to activity in the Green Belt, such as traffic generation, having an impact on openness. In some cases, there may be land uses which, although appropriate and not therefore affecting openness, still have an association with the urban area that constitutes a degree of urbanising influence. Notable examples could include sport and recreational playing fields or ‘large areas of fixed surface infrastructure such as large areas of hardstanding [that have not blended into the landscape]’, the latter of which is defined in the NPPF as PDL.

3.54 The urbanising influence of renewable energy and power infrastructure will be judged on a case-by-case basis based on their permanence and scale of fixed surface infrastructure, such as large areas of hardstanding, associated with them. For example, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore will not be judged as notable urbanising influences affecting contribution to the Green Belt purposes in perpetuity, whereas permanent

substations set on fixed surface infrastructure, do affect the contribution to the Green Belt purposes over the long term.

3.55 The strength of urbanising influence associated with such areas will depend on a number of factors, including the presence or lack of intervening physical boundary features, the scale/visibility of development in the associated urban area, landform change, distance from the existing urban edge and strength of relationship with the wider countryside.

‘An incongruous pattern of development’

3.56 The PPG cites an extended “finger” of development into the Green Belt as an example of an incongruous pattern of development. Where parcels are defined to reflect variations in contribution to the Green Belt purposes they are unlikely to be finger-like in form, so this scenario would more typically relate to the assessment of specific development proposals. There may, however, be smaller ‘satellite’ settlements around large built-up areas which lie close enough to them to be at risk of merger were development to reduce separation between them. Significant loss of separation in such a gap, could in effect lead to the satellite settlement becoming an extended finger of the large built-up area.

3.57 Any breaching of a significant existing physical feature, or a significant combination of adjacent physical features, that currently serve to restrict and contain the existing large built-up area, would also form an incongruous pattern of development. Examples of this sort of step-change in settlement form would be development crossing a major retaining and containing road, railway or river, or extending out from a valley onto a hilltop into open Green Belt land that does not relate well to existing development.

Purpose A outputs

3.58 The contribution to Purpose A has been determined in line with the illustrative factors listed in the PPG guidance, but with an additional ‘very strong’ level of contribution. Factors which can tip a ‘strong’ rating into the ‘very strong’ category include:

- A very strong sense of separation from the urban area, with no notable urbanising influence from it; or
- A significant impact on the separation of a satellite settlement from a large built-up area, resulting in a very incongruous impact on the settlement pattern.

3.59 The supporting analysis of contribution to Purpose A is set out in parcel assessment outputs in five boxes, each with a header. These draw on information set out in the ‘description’ section:

- The first box indicates whether the parcel is adjacent or near to a large built-up area, with additional text to note if the parcel is close to a village which is near enough to the large built-up area to contribute to preventing its sprawl (termed a ‘satellite’ settlement).
- The second box indicates whether the parcel is free from development.
- The third box indicates whether the parcel is subject to urbanising influences from outside of the parcel.
- The fourth box notes whether there are physical features which could restrict and contain development.
- The fifth box states whether development in the parcel would have an incongruous impact on the pattern of development.

Purpose B – to prevent neighbouring towns merging into one another

Grey belt PPG for Purpose B

3.60 The following features in combination are identified as being illustrative of a ‘**strong**’ contribution:

- Land forming a substantial part of a gap between towns.
- Absence of existing development.
- Development would result in the loss of visual separation of towns.

3.61 The presence of one or more of the following features in a gap between towns is identified as being illustrative of a ‘**moderate**’ contribution to Purpose B:

- Land forming a small part of a gap between towns.
- Development would not result in the loss of visual separation of towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.

3.62 Green Belt land that does not have a relationship with a gap between towns or forms only a very small part of a gap between towns, such that it

makes no contribution to visual separation, is identified as being illustrative of a **‘weak/no’** contribution to Purpose B.

Purpose B definitions

3.63 The PPG uses several terms which require further definition to be applied as part of the assessment process for Purpose B. These are addressed in the paragraphs below.

‘Town’

3.64 The PPG states that ‘this purpose relates to the merging of towns, not villages’ (PPG Paragraph: 005 Reference ID: 64-005-20250225).

3.65 The absence of intervening Green Belt land means that all the centres referenced in the emerging Sandwell local plan and noted under Purpose A can be considered a ‘town’. Any smaller centres strongly contiguous with these will form part of the same ‘town’.

3.66 Outside of Sandwell, the Birmingham suburbs of Great Barr, Newton, Hamstead and Handsworth, although merged with West Bromwich to the south of Handsworth, are considered separate enough for Green Belt land to still be playing some role in relation to Purpose B.

‘A substantial part of a gap’

3.67 Whether part of a gap can be described as substantial is a function not just of its relative size to a gap as a whole but also the physical features in it. Some ‘separating’ physical features, such as woodlands, landform features, major roads, railways and rivers strengthen perceived separation, particularly where they contribute to visual separation. Roads and railways can also be ‘connecting’ features that strengthen the link between towns, reducing the time taken to pass through a gap and weakening the role of visual separators.

3.68 Other areas of built form, such as villages and hamlets, industrial, educational and retail estates, between towns can be physically and visually connecting features. However, if the scale of intervening development and/or the size of gap between the towns means that these towns are not considered ‘neighbouring’ then Purpose B will be less directly relevant. In these cases, the contribution of open land in gaps between towns and other areas of built form is addressed through Purpose A, which recognises the role of such land in

preventing smaller 'satellite' settlements/developments from merging with towns.

3.69 A parcel will contribute more to the 'substance' of a gap between towns if it contains key separating physical features, and the more fragile a gap the smaller a part of a gap might be to be considered substantial.

3.70 The fragility of a gap is a key consideration to establish what is and is not substantial within or adjacent to a gap between neighbouring towns. Gap fragility is judged based on a combination of factors including the relative size of the gap and/or the presence/absence of connecting and separating features:

- A robust gap will typically be relatively wide and contain significant physical features that maintain visual separation.
- A moderate gap may be relatively wide but lack significant physical features that maintain visual separation or be relatively narrow but contain physical features that maintain visual separation.
- A fragile gap will typically be relatively narrow and lack physical features that maintain visual separation.

3.71 Green Belt land can play a peripheral role and therefore make a more limited contribution to a gap between towns where it does not lie directly in a gap but its development would weaken Green Belt land in a gap. Green Belt land on the periphery of fragile gaps may still be judged to be a substantial part of it but otherwise will generally not. Green Belt land within a gap may also to an extent be considered peripheral if the neighbouring towns in question are already to a significant extent connected by development. This may be because the functional role of the gap has already been eroded by the partial merging of the towns.

3.72 Development expanding a town out into the core of a gap and removing a relatively large part of it would clearly represent a substantial impact. However, this area of Green Belt would generally be recorded as making a 'strong' contribution to Purpose A and is more appropriately considered relative to this purpose. In this scenario, as a consequence of a likely resulting incongruous pattern of development, the assessment area would not be eligible for definition as grey belt.

3.73 Relatively wide gaps between towns generally have scope for some new development within them without significant loss of visual separation between neighbouring towns. Consequently, large parcels or 'outer areas' within or on the periphery of relatively wide gaps that only represent 'a substantial part of a

gap' between towns by virtue of their size will generally be rated as making a 'moderate' contribution to Purpose B, in acknowledgement of their potential to accommodate development in smaller parts of them without loss of visual separation of towns. Thus, the assessment findings will also help to identify gaps between neighbouring towns where there could be potential (in Green Belt terms) for development. This could include new settlements.

A 'small' or 'very small' part of a gap'

3.74 'A small part of a gap' is judged to be an 'insubstantial' part of it – that is, land in a gap that does not meet the 'substantial' definition above – but one which still provides a degree of visual separation.

3.75 A 'very small' part of gap is an area which does not contribute to visual separation, generally as a result of their existing development and/or containment and significant urbanisation. These areas will generally also make a weak/no contribution to Purpose A.

3.76 It is not appropriate to define fixed gap widths for the terms 'substantial', 'small' and 'very small'. As with the definition of 'near to' set out above, this will depend on site-specific factors, including the distance in proportion to the size of towns, the degree of visual separation, and the presence of urbanising development or activity within the Green Belt.

'Loss of visual separation'

3.77 'Loss' is interpreted as a 'significant reduction' in visual separation, rather than its complete removal. Typically the development of a substantial part of a gap has the potential to equate to a significant loss of visual separation although, as noted in the section above, relatively wide gaps between towns could accommodate some degree of new development, isolated from any town, without a significant loss of visual separation i.e. no more than a minor reduction in visual separation. Negligible reductions in visual separation are likely to be limited to areas already containing existing development and/or are contained and significantly urbanised by urban influences.

'Free of existing development'

3.78 'Existing development' is not considered to include the appropriate development 'exceptions' listed in NPPF paragraph 154, such as agricultural buildings, which case law [\[See reference 13\]](#) generally considers does not

affect the openness of the Green Belt. Paragraph 160 of the NPPF states 'elements of many renewable energy projects will comprise inappropriate development'; however, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore will not be judged as existing development affecting contribution to the Green Belt purposes in perpetuity.

3.79 'Free of' is not considered to mean 'no existing inappropriate development'. The influence of existing inappropriate development is judged on the basis of a combination of an area's visual and spatial openness.

Purpose B assessment outputs

3.80 The contribution of a parcel to Purpose B has been determined in line with the illustrative factors listed in the PPG guidance, but with an additional 'very strong' level of contribution. Factors which can tip a 'strong' rating into the 'very strong' category include:

- Development would significantly weaken what is already a fragile gap.
- Development would result in a very substantial loss of visual separation of towns.

3.81 The supporting analysis for contribution to Purpose B is set out in parcel assessment outputs in three boxes, each with a header. These draw on information set out in the 'description' section:

- The first box states whether the parcel lies in a gap between towns and, if so, gives an indication of the strength of the gap, with reference to distance, separating and connecting features and visual openness. This helps to support judgements as to whether the parcel forms a substantial part of the gap.
- The second box indicates whether the parcel is free from development.
- The third box states whether the parcel forms a substantial, small or very small part of the gap, with reference to separating features that would be lost were development to take place.
- The fourth box comments on the extent of loss of visual separation.

Purpose C – to protect the countryside from encroachment

3.82 Purpose C is not relevant to the identification of grey belt and is not referenced in the PPG, but it is still one of the five purposes of Green Belt set out in the NPPF. Ratings of contribution to Purpose C could still help inform judgements regarding which grey belt areas are more suitable for release than others in Green Belt terms. In addition, if the release and/or development of Green Belt land outside of defined grey belt areas needs to be considered, contribution ratings for Purpose C will likely be an important consideration. For example, in locations not near to and remote from towns and cities, variations in contribution to Purpose C will likely provide the only source of comparison in the contribution of Green Belt land to the Green Belt purposes.

Purpose C definitions

3.83 Purpose C has been assessed by determining the extent to which a location can be considered part of the countryside, the level of urbanising influence affecting it and whether or not development in the parcel would significantly increase urbanising influence on adjacent open land.

‘Part of the countryside’

3.84 Green Belt land is part of the countryside where it is open and has a clear connection with the wider open countryside. Physical isolation from the wider countryside, uses which create a strong association with an urban area, or the presence of existing urban development can affect what is judged to be countryside in Green Belt terms. This is not a judgement which considers the scenic beauty, ecological value or condition of land.

‘Urbanising influence’

3.85 This is defined as a combination of both the influences of ‘existing development’ and ‘other urbanising influences’ (both defined under Purpose A above). This includes urbanising development washed over by, inset within or directly adjacent to the outer edges of Green Belts, such as villages and hamlets, industrial, educational and/or retail estates.

3.86 Relevant factors influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform

change, distance from the urban areas, and the strength of relationship with the wider countryside.

Purpose C assessment outputs

3.87 The contribution of a parcel to Purpose C has been determined in terms of whether land makes a very strong, strong, moderate or weak /no contribution to this Purpose.

3.88 The following features in combination are identified as being illustrative of a '**very strong**' contribution:

- Land is part of the countryside.
- Negligible or no urbanising influence from development within or outside of the parcel, and a strong sense of separation from urban areas.
- A lack of features to restrict and contain development, such that adjacent open Green Belt land would be subject to stronger urbanising influence than is currently the case, were development to take place.

3.89 The following features in combination are identified as being illustrative of a '**strong**' contribution:

- Land is part of the countryside.
- None or no significant urbanising influence with a lack of features to restrict and contain development, such that were development to take place there would be a stronger urbanising impact on adjacent Green Belt land than is currently the case.

3.90 The following features in combination are identified as being illustrative of a '**moderate**' contribution:

- Land is part of the countryside.
- Some urbanising influence from development within and/or outside of the parcel.
- The presence of features to restrict and contain development, such that were development to take place, there would be no significantly stronger urbanising impact on adjacent Green Belt land.

3.91 The following features in combination are identified as being illustrative of a '**weak/no**' contribution:

- Land is wholly or largely contained from the wider countryside by development, or openness is significantly limited by existing development.
- Significant urbanising influence from development within and/or outside of the parcel.
- Were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

3.92 The supporting analysis for contribution to Purpose C is set out in parcel assessment outputs in four boxes, each with a header. These draw on information set out in the ‘description’ section:

- The first box indicates whether the parcel is perceived as part of the countryside or whether urban containment or development weakens its relationship with the wider countryside.
- The second box indicates whether the parcel is free from development.
- The third box indicates whether the parcel is subject to urbanising influences from outside of the parcel.
- The fourth box states whether development in the parcel would significantly increase urbanising influence on adjacent open land.

Purpose D – to preserve the setting and special character of historic towns

Grey belt PPG for Purpose D

3.93 The following features in combination are identified as being illustrative of a ‘**strong**’ contribution to Purpose D:

- Absence of existing development.
- Form part of the setting of a historic town.
- Land makes a considerable contribution to a historic town’s special character – being within, adjacent, or of significant visual importance to historic aspects.

3.94 The presence of one or more of the following features, in addition to being part of the setting and/or contributing to the special character of a historic town, is identified as being illustrative of a ‘**moderate**’ contribution to Purpose D:

- Containing existing development.

- Separated from historic aspects of the town by existing development or topography.
- No important visual, physical, or experiential relationship to historic aspects of a town.

3.95 Land that does not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town is illustrative of a '**weak/no**' contribution to Purpose D.

Purpose D definitions

3.96 The PPG uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

'Historic town'

3.97 The PPG is clear that this purpose relates to historic towns, not villages (PPG Paragraph: 005 Reference ID: 64-005-20250225). An extract from Hansard in 1988 clarified which historic settlements in England were certainly considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge [See reference 14]. Durham has since been added to this list.

3.98 It has been LUC's experience through consultation with Historic England on several Green Belt study method statements, that Historic England do not consider the list on towns quoted in Parliament to necessarily be exclusive. Therefore, the settlements referenced under the definitions of 'large built-up area' (see section titled Purpose A definitions) and 'town' (see section titled Purpose B definitions) above all have the potential to be defined as 'historic towns' relevant to the assessment of Purpose D, subject to the definition of their historic settings or special character.

3.99 Clearly there are historic aspects to towns and smaller settlements within the study area, but the important aspect in terms of contribution to this purpose is that there needs to be a significant relationship between Green Belt land and historic aspects of a settlement's setting, such that some degree of special character results. Many towns have designated conservation areas, but these are commonly focused on historic buildings and spaces within towns, with any

views of the Green Belt countryside being incidental rather than key to special character.

‘Setting and special character’

3.100 The extent to which the Green Belt contributes to the setting and special character of a historic town is related to the visual, physical and/or experiential relationship between Green Belt land and historic aspects of a town.

3.101 What forms part of a historic towns setting and/or contributes to the special character of a historic town is a matter of professional judgement that cannot be defined in general terms. It is unique to each historic town’s character, townscape and connections to the wider landscape.

3.102 The connection between a historic town’s historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement.

‘Historic aspects’

3.103 In order to establish the relevance of Green Belt land to historic aspects of a historic town it is necessary to review and research each historic town’s historic aspects in turn. This will be done with reference to historic environment evidence for each historic town, such as historic town setting studies and conservation area appraisals.

3.104 Recorded references to the open countryside or key physical features and/or landmarks in the Green Belt are useful in judging and justifying the appropriate level of contribution relevant Green Belt land makes to a historic town’s setting and special character.

3.105 Many historic towns have historic aspects that have little to no relationship with their setting and special character, and many historic towns contain historic areas focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than part of the historic town’s setting and special character. Where this is the case, contribution to Purpose D can often be ruled out, noting that this does not mean such places do not have special and unique characteristics worthy of

preservation, just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D.

‘Free of existing development’

3.106 ‘Free of existing development’ is defined under Purpose A and B above. The same definition applies to Purpose D.

Purpose D outputs

3.107 The historic origin of towns in and around Sandwell is acknowledged but, in keeping with the analysis carried out as part of the Black Country Green Belt Study in 2019, none are considered to have a special character to which Green Belt land within the borough makes any significant contribution.

3.108 This means that no Green Belt land within Sandwell is considered to contribute to preserving the setting and special character of historic towns. All parcels have been assessed as making a weak/no contribution to Purpose D, with no parcel-specific analysis but instead a single bullet for each parcel stating that “No settlements in Sandwell are considered to be historic towns to which surrounding Green Belt land contributes special character.”

Purpose E – to assist in urban regeneration

3.109 Purpose E is not relevant to the identification of grey belt and is not referenced in the PPG, but it is one of the five purposes of Green Belt set out in the NPPF.

3.110 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose E, and either do not rate them or rate them all equally, on the grounds that outside the definition of PDL, it is difficult to justify why the release and/or development of one area of Green Belt land has a greater impact on encouraging re-use of urban land than another. This is supported by planning inspector’s judgements on the matter, such as the inspector’s report re: the London Borough of Redbridge’s Local Plan (January 2018), which noted that with regards to Purpose E ‘this purpose applies to most land’ but that ‘it does not form a particularly useful means of evaluating sites’ **[See reference 15]**.

3.111 More generally regarding plan-making, paragraph 147 of the NPPF states that ‘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 [including] a) makes as much use as possible of suitable brownfield sites and underutilised land and 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'. In other words, Purpose E must have already been followed before options in the Green Belt are considered further.

3.112 Using evidence to inform meaningful judgements on the collective contribution Green Belt land makes to Purpose E is also difficult. In the absence of any clear guidance on what percentage of recorded brownfield land enables a Green Belt to play a stronger or more limited role in encouraging urban regeneration, a uniform 'equal' contribution to Purpose E has been applied to all areas of Green Belt in the study area.

Step 3: Identify provisional grey belt

3.113 Having assessed strength of contribution to Green Belt purposes A, B and D, areas of potential grey belt have been defined and are mapped. A line of text at the end of each parcel assessment concludes on whether land is grey belt (subject to consideration of footnote 7 areas/assets).

3.114 PPG Paragraph: 006 Reference ID: 64-006-20250225 clarifies that grey belt, 'excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF would provide a strong reason for refusing or restricting development. It highlights that in such locations grey belt can only be identified provisionally before consideration is informed by specific proposals which provide appropriate detail. Mapping will therefore also show footnote 7 areas, as Green Belt land which coincides with footnote 7 areas or assets which can therefore only provisionally be considered grey belt. Land outside of footnote 7 areas could also require more detailed consideration of the potential impact that proposed or envisaged development might have on policies applicable to the footnote 7 areas.

3.115 Critically, even where Green Belt land is identified as grey belt, if proposed for development there remains the need to consider such factors as whether:

- Its release and such development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (as set out below);

- There is a demonstrable unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.

Fundamental impact on remaining Green Belt land

3.116 Green Belt assessments must also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) could fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. The PPG states that this judgement should focus on evaluating the effect of release or development on ‘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’.

3.117 What is fundamental and meaningful could vary significantly based on the scale and nature of the plan area and the range, significance and extent of contribution Green Belt land makes to the Green Belt purposes within it.

Fundamental impact definitions

3.118 The PPG uses a few terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

‘Plan area’

3.119 The plan area is the area to be covered by the emerging local plan – i.e. the Sandwell Metropolitan Borough Council.

‘Purposes (taken together)’

3.120 Most Green Belt land does not contribute to all Green Belt purposes to the same degree, with large areas of Green Belt land not contributing or contributing weakly to multiple purposes. Consequently, what constitutes a fundamental and meaningful impact will vary depending on which purposes are

important. Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way.

‘Fundamental’ and ‘meaningful’

3.121 Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in the plan area to serve a single important purpose to have a meaningful impact. Other proposals may undermine multiple purposes to a degree that in combination their impact is meaningful.

3.122 The scale and contiguity of Green Belt land within a district may also play a role in what is meaningful. Release or development of smaller areas of Green Belt land are likely to be more meaningful in a district with smaller areas of Green Belt land. Release or development of pockets of Green Belt land that are isolated from the wider designation within urban areas are less likely to have a meaningful impact.

3.123 A fundamental and meaningful impact on Purpose A (to check the unrestricted sprawl of large built-up areas) may include, but is not limited to, where release or development of land would result in the physical or perceived merging of a large built-up area with an adjacent settlement – whether a small settlement or another, distinct part of the larger built-up area – such that the two would be perceived as part of the same ‘sprawling’ large built-up area. How fundamental and meaningful the loss of a such a gap would be is dependent on its current contribution to Purpose A. Most sprawl of a large built-up area will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil this function.

3.124 A fundamental and meaningful impact on Purpose B (to prevent neighbouring towns from merging into one another) include but is not limited to release or development that would result in the physical or perceived merging of two currently distinctly separate neighbouring towns, or where release or development would result in the loss of the most substantial part of a gap separating neighbouring towns such that it no longer played a meaningful role in relation to Purpose B.

3.125 A fundamental and meaningful impact on Purpose C (to assist in safeguarding the countryside from encroachment) may include but is not limited to where release or development would sever and isolate an area of Green Belt land contributing strongly to Green Belt Purpose C from the wider designation. The vast majority of Green Belt land has at least some countryside function.

The release or development of the vast majority of Green Belt land would likely not fundamentally and meaningfully influence the function of adjacent Green Belt land such that it would be cease be considered countryside.

3.126 A fundamental and meaningful impact on Purpose D (to preserve the setting and special character of historic towns) may include but is not limited to the release or development of an important or very important part of the setting of a historic town, integral to its special character. This is not applicable in Sandwell.

3.127 A fundamental and meaningful impact on Purpose E (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered likely given that other Green Belt policy prioritise the use of non-Green Belt locations first followed by previous developed land in the Green Belt, i.e. it is unlikely that Green Belt release or development could be justified having not already demonstrated that this purpose has not been fundamentally and meaningfully considered.

Fundamental impact outputs

3.128 Without a clear understanding of the location of release or development, its scale and land use, including what Green Belt land would remain within a plan area, it will not be possible to make a definitive judgement on fundamental impact. In the absence of specific proposals, the variations in contribution to each Green Belt purpose identified in this assessment highlight the areas where Green Belt contribution is at its greatest within Sandwell. These areas of highest contribution have been reviewed in the round to judge where release or development could fundamentally and meaningfully undermine the wider Green Belt purposes. These judgements have been justified.

3.129 When the Council is in a position to evaluate specific proposals for Green Belt release or development, it will be possible to make a definitive judgement as to whether they would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the whole local authority area.

Chapter 4

Green Belt Parcel Assessment Findings

Summary Table and Overview Maps

4.1 Table 4.1 below lists the ratings for each parcel and indicates which are potentially grey belt.

4.2 Figures 4.1 - 4.5 are summary maps for the Sandwell area. These maps show:

- The highest contribution rating for each parcel (**Figure 4.1**)
- Contribution to Purpose A (**Figure 4.2**)
- Contribution to Purpose B (**Figure 4.3**)
- Contribution to Purpose C (**Figure 4.4**)
- Contribution to Purpose D (**Figure 4.5**)
- Contribution to Purpose E (**Figure 4.6**)
- Land provisionally identified as grey belt (**Figure 4.7**)

Potential for Fundamental Impacts

4.3 As noted in Chapter 3, in the absence of specific proposals the variations in contribution to each Green Belt purpose identified in this assessment highlight the areas where Green Belt contribution is at its greatest within the Local Plan area. These areas of highest contribution help give an indication of where release or development could fundamentally and meaningfully undermine the purposes.

4.4 Figure 4.1 illustrates the strongest level of contribution each area of the district's Green Belt land makes to Green Belt purposes A, B and C, noting that no land in Sandwell makes a contribution to Purpose D and all Green Belt land is judged to make an equal contribution to Purpose E.

4.5 Considering the scale and contiguity of Green Belt land in Sandwell and the contributions the borough's Green Belt land makes to the Green Belt purposes, the release or development of the following has the potential to fundamentally

undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

Purpose A

4.6 The Green Belt in Sandwell covers a relatively small area which is largely contained by urban development. There is a contiguous but in places narrow corridor of Green Belt extending north from Sandwell through Walsall and out to the more expansive open countryside north of Sutton Coldfield, and to the south the West Midlands conurbation forms a single large built-up area. The Green Belt in Sandwell is broad enough for parts of it to have a strong sense of separation from urban areas, and therefore to make a 'strong' contribution to preventing urban sprawl, but it is too contained for any land to make a 'very strong' contribution to Purpose A. Whilst development could result in the loss of an open gap between part of the large built-up area it would not result in any merger between a distinctly separate settlement and a large built-up area.

Purpose B

4.7 The Green Belt in Sandwell is playing a role in separating towns, in particular along the spine of the M5 motorway, around which the Sandwell Valley provides separation between Birmingham and West Bromwich. However, as is the case with Purpose A, urban connectivity within the large built-up area as a whole also limits the extent to which West Bromwich and Birmingham can be considered distinct towns separated by Green Belt, so no land is rated as making a 'very strong' contribution to Purpose B.

Purpose C

4.8 Although the safeguarding of the countryside from encroachment is not relevant to the identification of grey belt, Purpose C remains one of the five Green Belt purposes. Paragraph 155a within the NPPF states that development in the Green Belt should not be regarded as inappropriate where development would utilise grey belt land and would not fundamentally undermine the purposes (taken together).

4.9 Within Sandwell, there are no areas of countryside which have a very strong sense of separation from any substantial urban area, as all the Green Belt land within the district is either considered adjacent or 'near-to' a large built-up area. The narrowness of the Green Belt corridor in the northern part of Sandwell

means that there is potential for development that would result in isolation of the Sandwell Valley from the wider Green Belt countryside – although this would not necessarily weaken the contribution of land in the broader Sandwell Valley to Purpose C.

Making judgements

4.10 An impact on all Green Belt purposes is not necessary for proposed development to be considered to fundamentally undermine the purposes, and this could not occur in Sandwell due to the lack of contribution to Purpose D. Impact on multiple purposes can be considered more likely to represent a fundamental impact than impact on a single purpose, but a strong enough impact on a single purpose could be enough to have this effect.

4.11 Although no land in Sandwell makes a ‘very strong’ contribution to any of the Green Belt purposes, consideration needs to be given to the impact of development in the context of the limited amount of Green Belt in the local plan area. Development that would isolate the Sandwell Valley from the Green Belt in Walsall could be considered to fundamentally undermine Purpose C, through loss of linkage to the wider countryside, and the increased merger of towns / parts of the large built-up area would undermine Purposes B and C within the limited plan area.

4.12 It is not possible to make any more definitive judgements on what constitutes a fundamental impact without a clearer understanding of the exact location of release or development in the district, its scale and land use, including what Green Belt land would remain within a plan area.

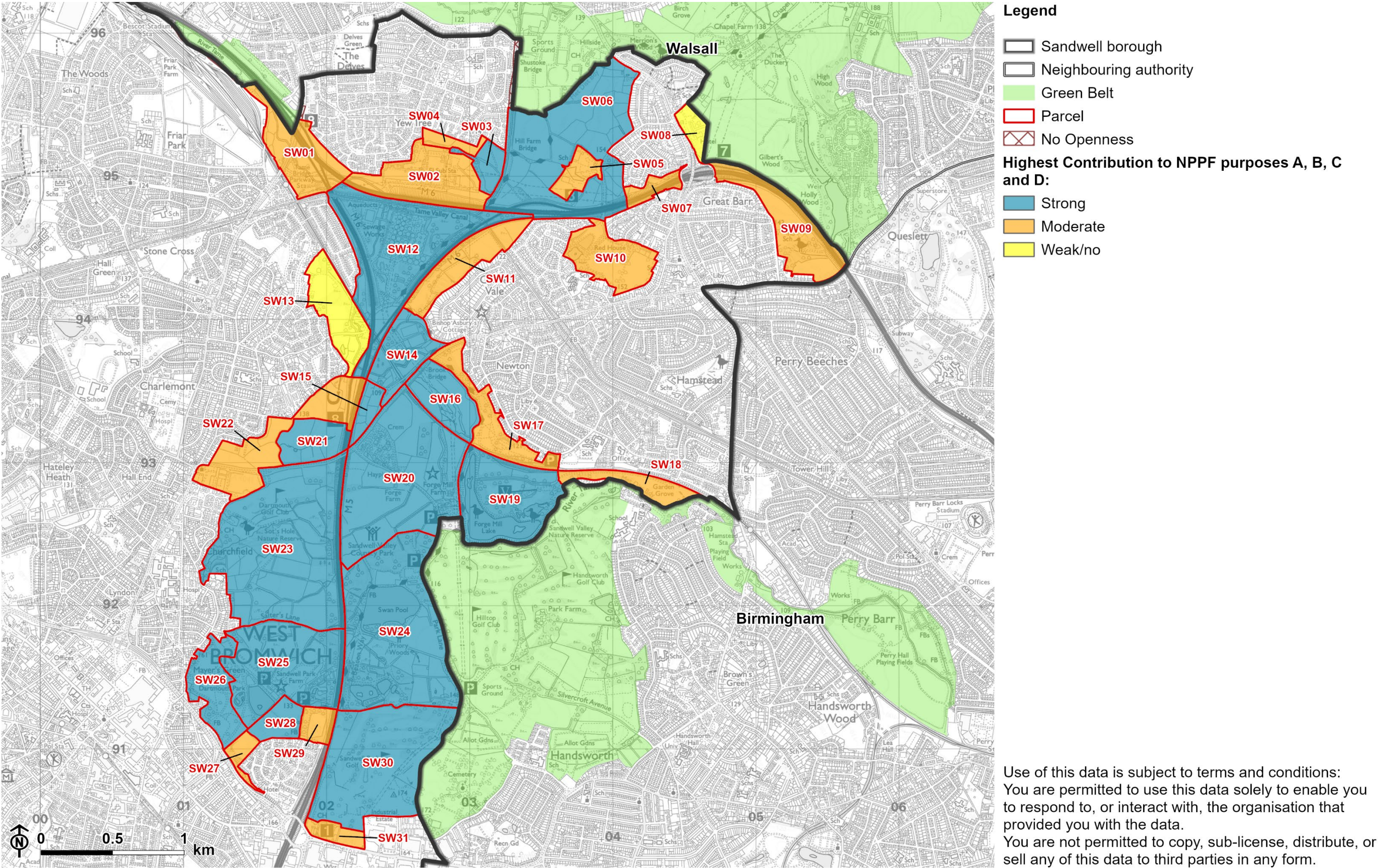
4.13 Once the Council is in a position to evaluate specific proposals for Green Belt release or development, it will be possible to make a definitive judgement as to whether they would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

Table 4.1: Summary of assessment findings

Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E:	Highest Contribution Rating:	Grey belt
SW01	21.46	Moderate	Moderate	Weak/No	Weak/No	Equal	Moderate	Yes
SW02	27.36	Moderate	Moderate	Moderate	Weak/No	Equal	Moderate	Yes
SW03	6.38	Strong	Strong	Strong	Weak/No	Equal	Strong	No
SW04	3.56	Moderate	Moderate	Moderate	Weak/No	Equal	Moderate	Yes
SW05	6.62	Moderate	Moderate	Moderate	Weak/No	Equal	Moderate	Yes
SW06	70.19	Strong	Strong	Strong	Weak/No	Equal	Strong	No
SW07	4.86	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW08	4.97	Weak/No	Weak/No	Weak/No	Weak/No	Equal	Weak/No	Yes
SW09	25.48	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW10	19.34	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW11	17.85	Moderate	Moderate	Moderate	Weak/No	Equal	Moderate	Yes
SW12	62.05	Strong	Strong	Strong	Weak/No	Equal	Strong	No
SW13	18.29	Weak/No	Weak/No	Weak/No	Weak/No	Equal	Weak/No	Yes
SW14	17.06	Strong	Strong	Moderate	Weak/No	Equal	Strong	No
SW15	5.27	Strong	Strong	Strong	Weak/No	Equal	Strong	No
SW16	16.07	Strong	Strong	Strong	Weak/No	Equal	Strong	No

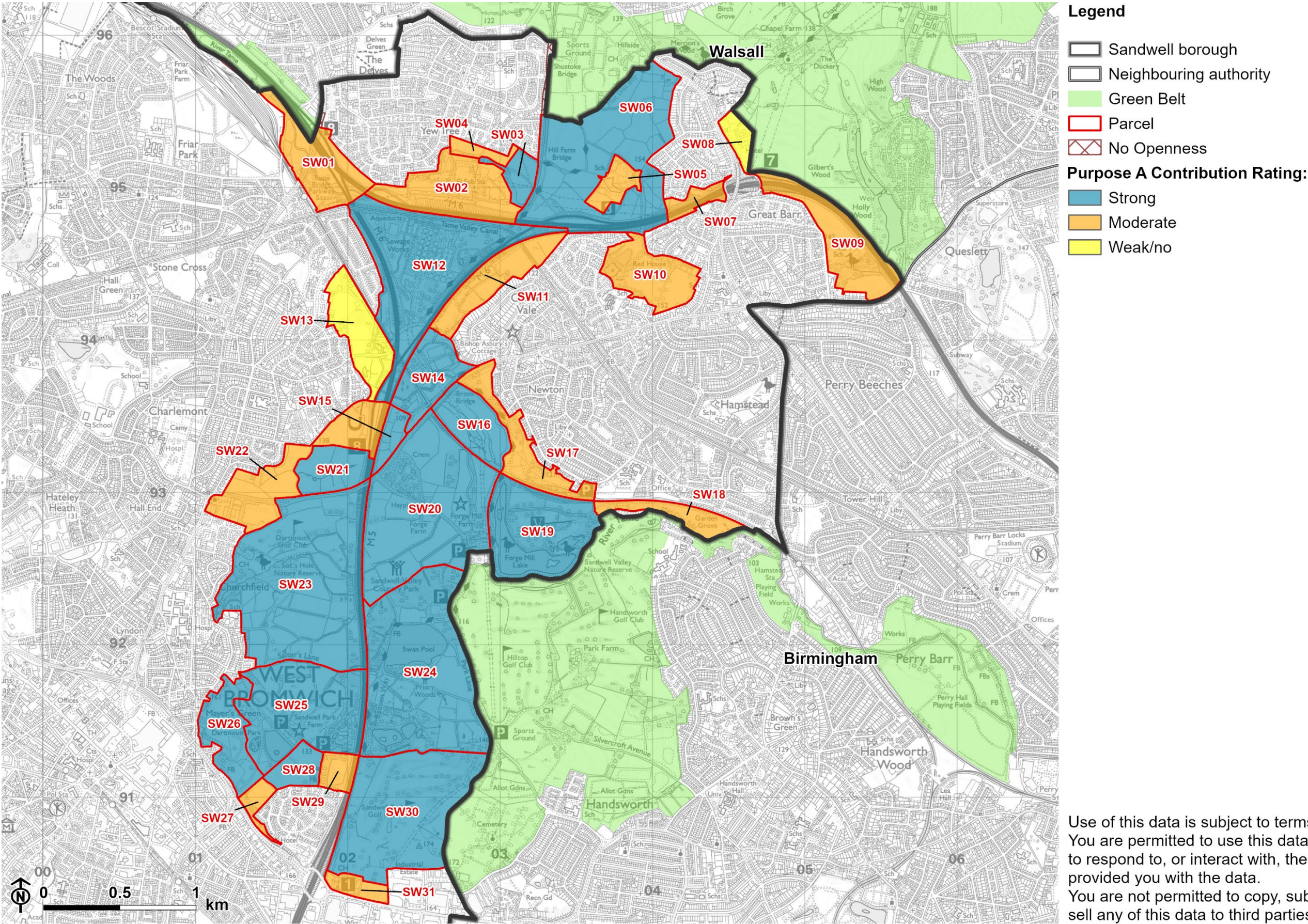
Parcel	Area (ha)	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E:	Highest Contribution Rating:	Grey belt
SW17	17.01	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW18	10.09	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW19	37.85	Strong	Moderate	Strong	Weak/No	Equal	Strong	No
SW20	71.25	Strong	Strong	Strong	Weak/No	Equal	Strong	No
SW21	12.90	Strong	Moderate	Moderate	Weak/No	Equal	Strong	No
SW22	29.46	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW23	90.23	Strong	Moderate	Strong	Weak/No	Equal	Strong	No
SW24	78.10	Strong	Strong	Strong	Weak/No	Equal	Strong	No
SW25	46.37	Strong	Moderate	Strong	Weak/No	Equal	Strong	No
SW26	17.94	Strong	Weak/No	Strong	Weak/No	Equal	Strong	No
SW27	3.86	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW28	7.58	Strong	Weak/No	Strong	Weak/No	Equal	Strong	No
SW29	5.54	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes
SW30	60.00	Strong	Strong	Strong	Weak/No	Equal	Strong	No
SW31	5.06	Moderate	Weak/No	Moderate	Weak/No	Equal	Moderate	Yes

Figure 4.1: Highest contribution to NPPF purposes A, B, C and D



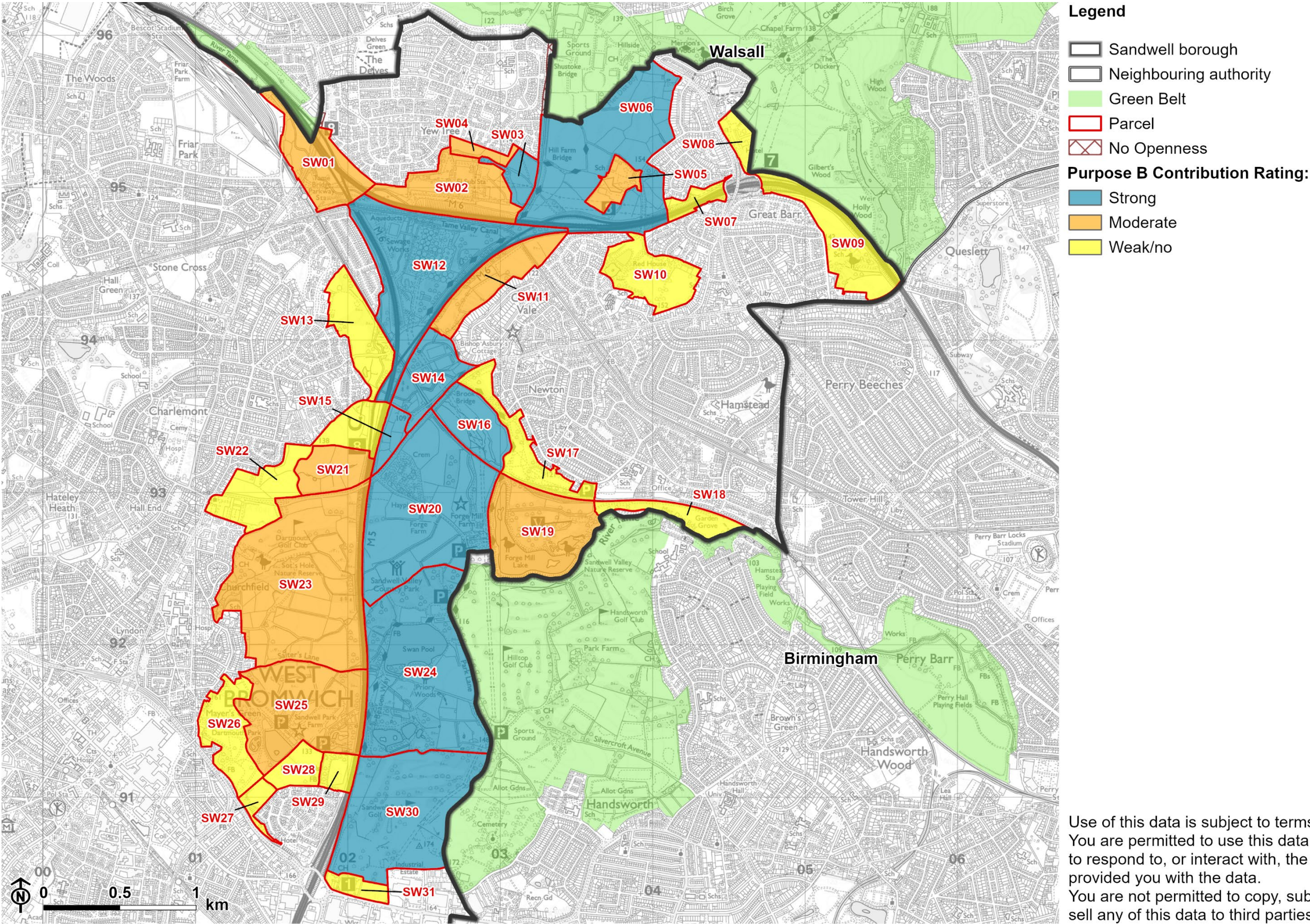
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Figure 4.2: Contribution to Purpose A



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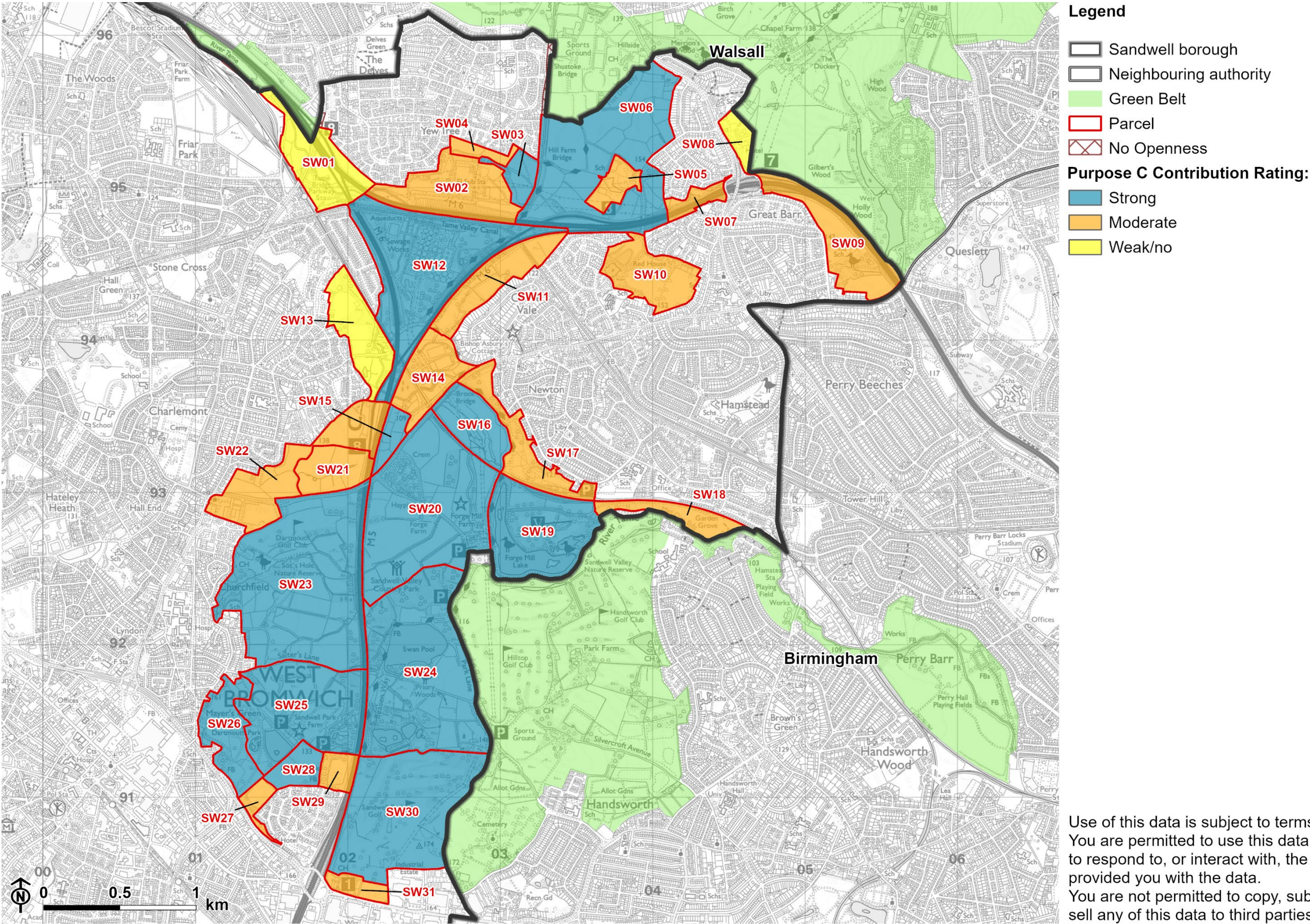
Figure 4.3: Contribution to Purpose B



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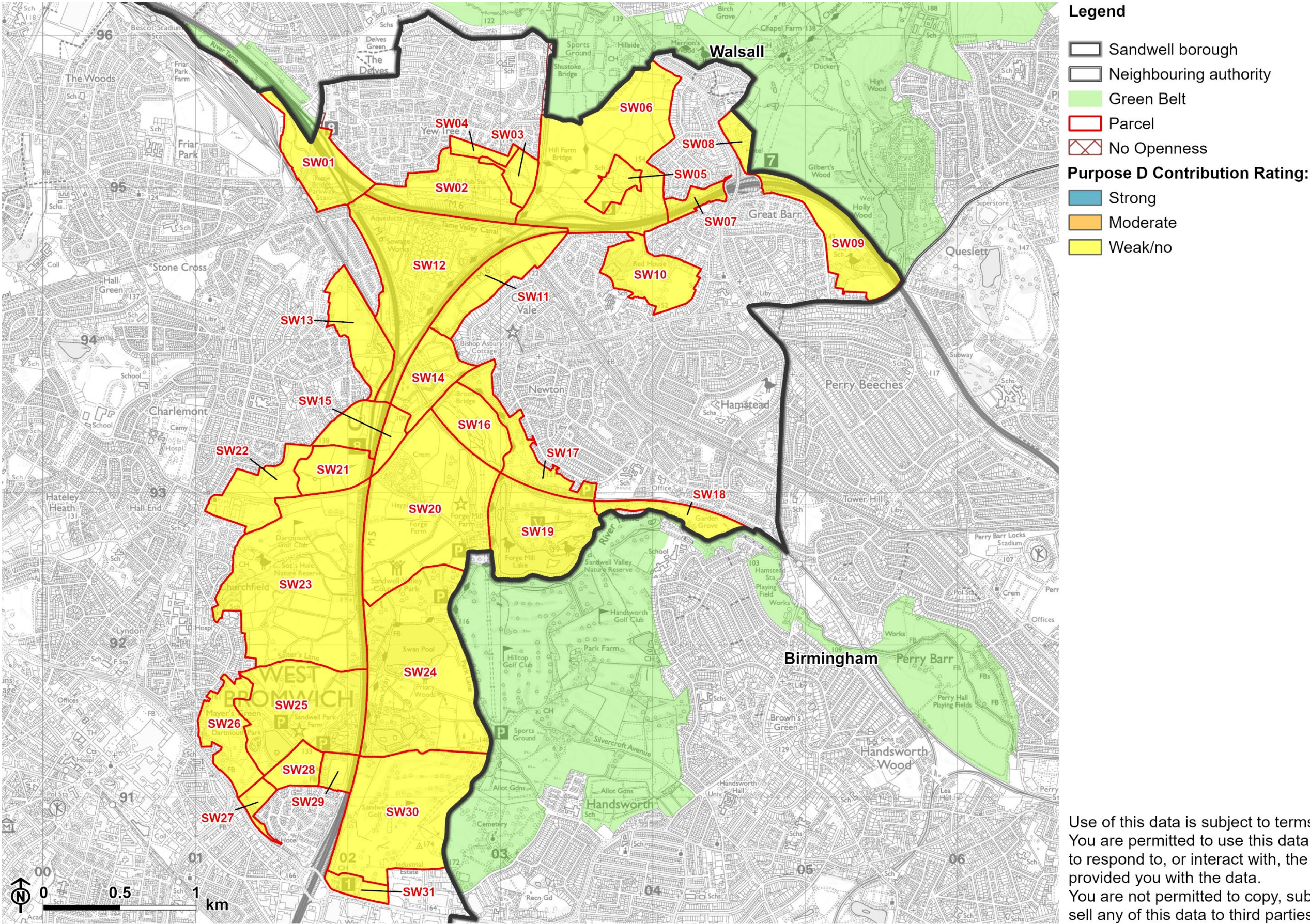
Figure 4.4: Contribution to Purpose C



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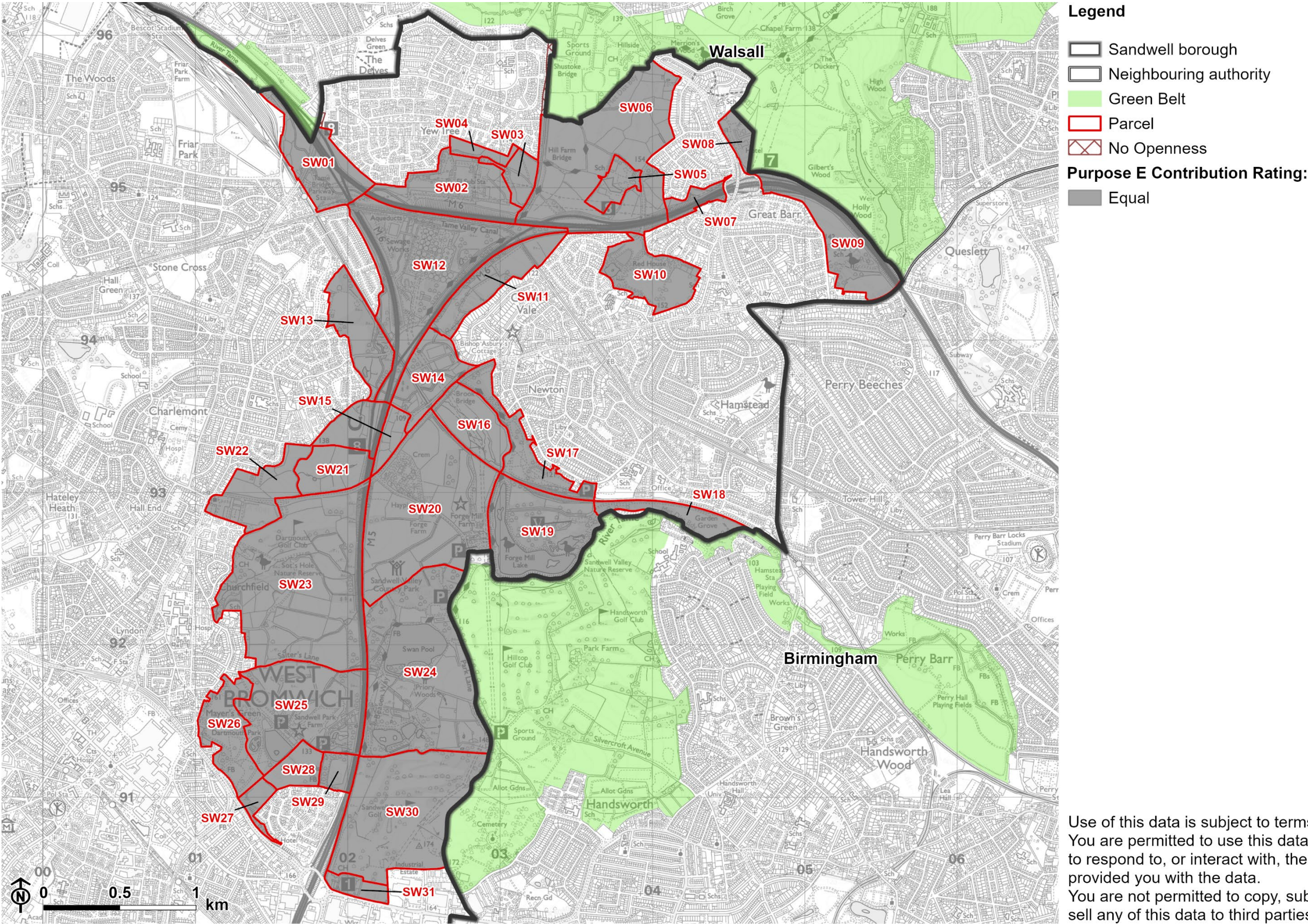
Figure 4.5: Contribution to Purpose D



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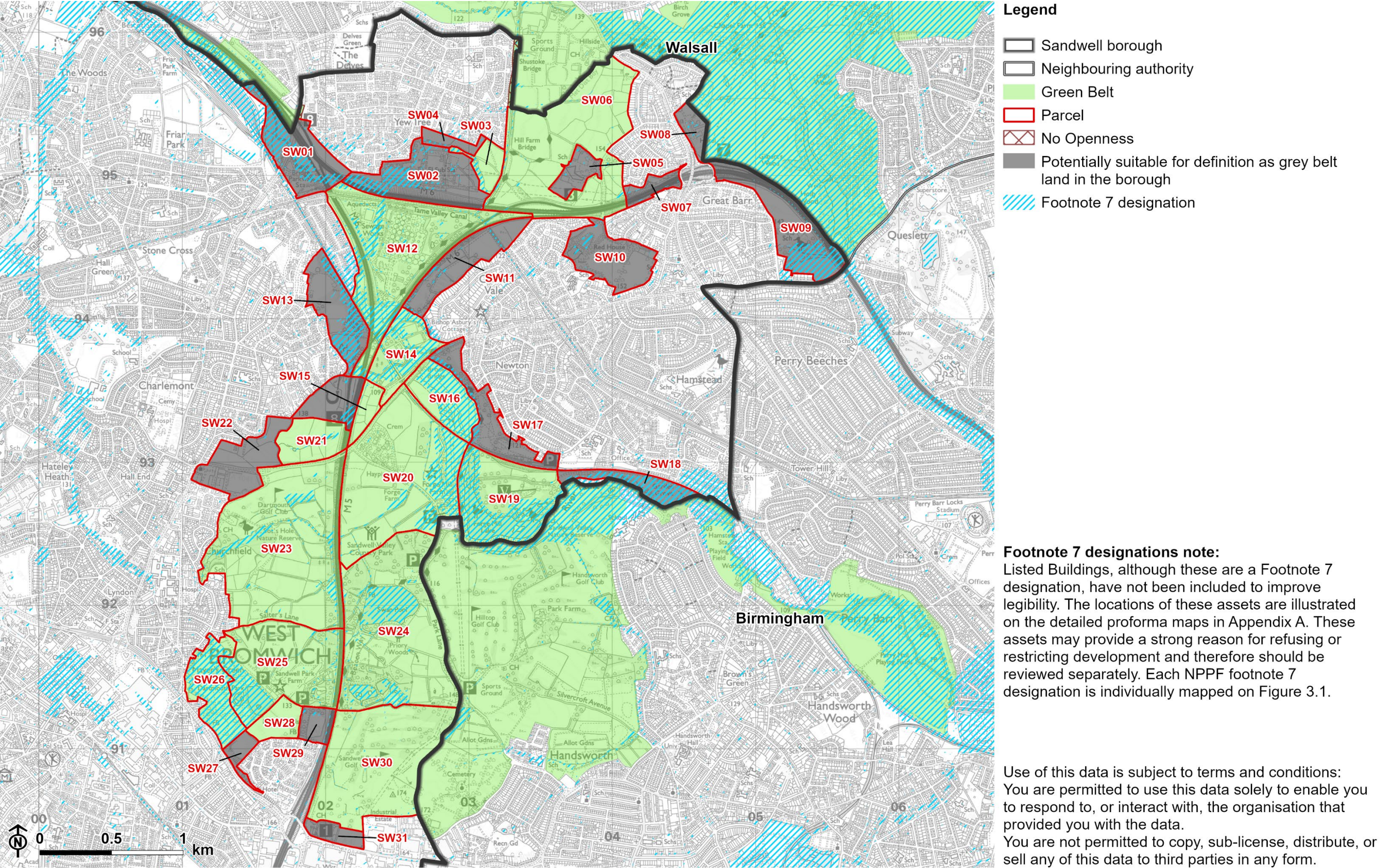
Figure 4.6: Contribution to Purpose E



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Figure 4.7: Areas suitable for definition as grey belt



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Chapter 5

Next Steps

5.1 This chapter sets out the key issues that the Council will need to consider when considering the findings of this report and if they decide to proceed with the release of land from the Green Belt.

Exceptional Circumstances

5.2 In considering the potential release of Green Belt land, whether identified as grey belt or otherwise, the Council will need to weigh a number of interrelated factors to ensure decisions are both robust and consistent with national policy.

5.3 For plan-making purposes, the first step will be to consider whether exceptional circumstances exist to justify changes to Green Belt boundaries. Paragraph 147 of the NPPF states that:

“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.”

5.4 This includes considering: a) the prioritisation of brownfield sites and underutilised land outside of the Green Belt; b) optimisation of the density of development; and c) having discussion with neighbouring authorities about whether they could accommodate any of the identified need for development.

Prioritisation

5.5 Should it be considered that exceptional circumstances are justified then priority should be given to Green Belt land in the following order:

- Previously developed land (PDL), including land that is grey belt;
- Grey belt which is not previously developed land;
- Other Green Belt locations (prioritising least strong areas).

5.6 PDL, by definition, generally makes a more limited contribution to the purposes of the Green Belt and is generally regarded as being more suitable for development,

subject to detailed considerations. Where PDL is not available or insufficient to meet identified needs, attention may then focus on other areas of grey belt.

5.7 Any assessment of the impact of releasing sites for development will also need to:

- Consider whether the application of policies relating to the areas or assets in footnote 7 would provide a strong reason for restricting development. This may require further analysis.
- Address the potential for the purposes of the Green Belt to be fundamentally undermined across the plan area as a whole. For a local plan, this will require the cumulative effect of any proposed allocations to be considered: while the incremental release of individual sites may appear limited the combined impact could be significantly greater. The Council should, therefore, take a broad strategic perspective when identifying potential allocations.

Sustainability

5.8 Notwithstanding the above hierarchy of Green Belt land, in all instances the need to promote sustainable development in accordance with Paragraphs 110 and 115 of the NPPF is determinative. In short, where land is not in a location that is, or can reasonably be made, sustainable, its release for development would be inappropriate. The question of sustainability should be judged in relation to local context and the characteristics of the site or proposed development (particularly if development is “significant”), though authorities are expected to maximise opportunities for sustainable transport solutions in line with NPPF paragraphs 110 and 115 (albeit whilst acknowledging these opportunities will vary between urban and rural areas).

5.9 It is important to recognise that despite grey belt policy seeking to unlock more Green Belt locations for development, in practice the Council is still required to meet its development needs in a sustainable way. This is explicit in paragraph 148 of the NPPF which concludes:

“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”.

5.10 Where identified need, cannot be met through PDL and Grey Belt land alone, and other Green Belt locations are required, using the Sustainability Appraisal underpinning the Local Plan Evidence Base alongside this assessment will allow for the identification of alternative site options in a manner that likely achieves the sustainable development objectives sought by paragraphs 110, 115 and 148 of the NPPF.

5.11 Finally, should the Council conclude that Green Belt release is necessary, close attention must be given to the redefinition of Green Belt boundaries. Paragraph 149 of the NPPF makes clear that new boundaries must be defined clearly, using physical features that are readily recognisable and likely to be permanent. Establishing clear and defensible boundaries is central to ensuring the long-term integrity of the Green Belt.

Definition of Green Belt Boundaries

5.12 NPPF paragraph 149 requires Green Belt boundaries to be defined clearly, “using physical features that are readily recognisable and likely to be permanent”.

5.13 Boundary treatment can help to limit the impact of development on remaining Green Belt land, so the Council could give consideration to the following:

- Using landscape to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance. This can help to maintain a sense of separation between urban and open land. A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation.
- Strengthening boundaries at weak points – for example where ‘breached’ by roads. This can help reduce opportunities for sprawl. The use of buildings and landscaping can create strong ‘gateways’ to strengthen settlement-edge function.
- Defining Green Belt edges using strong, natural elements which form a visual barrier – for example a woodland belt. This can help to reduce the perception of urbanisation and may also screen residents from intrusive landscape elements within the Green Belt (for example major roads). Boundaries that create visual and movement barriers can however potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents so this needs to be carefully considered.
- The ownership and management of landscape elements which contribute to Green Belt purposes. Control of boundary features can help to ensure the

permanence of Green Belt: trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (for example within back gardens).

- Use of sustainable drainage features to define/enhance separation between settlement and countryside. This can help to strengthen the separation between urban and open land. It is important however to determine if local topography and ground conditions are suitable.

Enhancement of Green Belt

5.14 Paragraph 151 of the NPPF states that local planning authorities should plan positively to enhance the beneficial uses of the Green Belt. Aligned with this, the ‘Golden Rules’ (set out in paragraph 156), which are applicable where land is released for development through plan preparation or review, include a requirement for contributions to the provision of accessible green spaces.

5.15 The ‘Golden Rules’ are supported by the PPG which suggests the following considerations:

- New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.
- Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.
- Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).
- Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.
- Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.

5.16 It is therefore important that the Council considers where and how the borough's Green Belt can be enhanced, particularly the relationship between the Council's preferred sustainable pattern of development and the designations' potential for new and improved appropriate uses. Introducing or enhancing uses of Green Belt land that add to its value will strengthen the case for that land's future protection. Some examples are provided in the list below:

- Improving access. Enhancing the coverage and condition of the rights of way network and increasing open space provision is a key enhancement opportunity.
- Providing locations for outdoor sport. Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
- Landscape and visual enhancement. Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
- Increasing biodiversity. Most Green Belt land has potential for increased biodiversity value – for example the management of hedgerows and agricultural field margins, provision of habitat connectivity and planting of woodland. There may also be opportunities to link enhancements with requirements to deliver 'biodiversity net gain' associated with development proposals.
- Improving damaged and derelict land. Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

5.17 Beneficial uses could be achieved through planning conditions, Section 106 obligations and/or the Community Infrastructure Levy. We understand that Sandwell Council currently has an adopted Community Infrastructure Levy (CIL) policy; however, the Levelling Up and Regeneration Act 2023 will introduce a new Infrastructure Levy (IL), which is intended to replace CIL and certain Section 106 obligations over time. It remains to be seen how and when this new levy will be rolled out and whether Sandwell will be required to implement it.

5.18 There is benefit in early engagement with landowners and other interested parties, to obtain the necessary local consents, establish a detailed scope of works and identify a means of funding design, construction and management.

Appendix A

Parcel Assessments

Parcel assessment outputs

A.1 The individual parcel assessment proformas include

- Map of each parcel with Footnote 7 designations, and an aerial view
- Locational description, and description of the relationship between the parcel and the settlement, and with the wider countryside
- Parcel ratings for contribution to each of the Green Belt Purposes, and summary of the key factors supporting the assessed contribution ratings
- Concluding text to indicate whether the parcel is identified as grey belt, or potential grey belt, on the basis of its contribution ratings and in line with the February 2025 PPG.

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Additional map information: NPPF Footnote 7 designations not listed and mapped in this figure are generally not located within the study area or local data sets were not readily available. Available listed building point data has been mapped to draw attention to the location of these NPPF footnote 7 assets. Like other footnote 7 areas and assets, their presence highlights the need for further detailed work to establish the effects on these assets.

References

- 1 <https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2024-to-2025>
- 2 Ministry of Housing, Communities and Local Government published a revised version of the National Planning Policy Framework (December 2024.) Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 3 Footnote 55 of the [National Planning Policy Framework](#) (December 2024.)
- 4 Ministry of Housing, Communities and Local Government (2025) Planning Practice Guidance (PPG), Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>.
- 5 Sandwell Metropolitan Borough Council (2025) Sandwell Local Plan. Available at: <https://www.sandwell.gov.uk/downloads/file/3531/sandwell-local-plan-reg-19-submission-version>
- 6 NPPF definition of 'Habitat Site': Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.
- 7 NPPF definition of 'Heritage Asset': A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
- 8 Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.
- 9 Some Irreplaceable Habitat data sets are more up-to-date than others. Consequently, their extent mapped in this study may require refinement following detailed site specific work through the typical development management process.
- 10 Robin Buchanan, January 2025 with regards to Suite 1, The Stables, Cannons Mill Lane, Bishop's Stortford CM23 2BN (Appeal Ref: APP/J1915/W/24/3339916)

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- 11 Robin Buchanan, January 2025 with regards to Suite 1, The Stables, Cannons Mill Lane, Bishop's Stortford CM23 2BN (Appeal Ref: APP/J1915/W/24/3339916).
 - 12 The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.
 - 13 The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.
 - 14 Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.
 - 15 Planning Inspectorate, David Smith, Report to the Council of the London Borough of Redbridge regarding the Examination of the Redbridge Local Plan 2015-2030 (January 2018). Available at:
<https://www.redbridge.gov.uk/media/4732/redbridge-local-plan-inspectors-report.pdf>

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