

South Staffordshire Local Plan Review Examination

Hearing Statement for Matter 6: Green Belt

Representor: Miller Homes

Representor Reference: AGT24-030-03

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1. Introduction

- 1.1. Pegasus Group is instructed by Miller Homes to respond to the South Staffordshire Local Plan Examination: Matters, Issues and Questions produced by the Inspectors appointed to hold an independent examination of the South Staffordshire Local Plan Review 2023–2041 (the Local Plan).
- 1.2. Miller Homes are promoting 23ha of Green Belt land for development, located to the south of Holly Lane, Great Wyrley. The land comprises agricultural fields set across two parcels, that lie either side of the railway line (**Figure 1.1**).
- 1.3. Great Wyrley is a highly sustainable Tier 1 settlement which is a suitable location for Green Belt release and housing growth. The land is appropriately 1.2km (15-minute walk) from Landywood railway station which offers regular services to Walsall and Birmingham, which are authority areas which have significant unmet housing needs.
- 1.4. The entire landholding is available, suitable, and deliverable / developable and would form a logical and sensitive extension to the Tier 1 settlement. The north-eastern part of the landholding is allocated for development in the Local Plan and is referred to as Site 536a Land off Holly Lane. The remainder of the landholding is also suitable for allocation.

Figure 1.1: Miller Homes Landholding



- 1.5. This Hearing Statement relates to **Matter 6: Green Belt** and the following questions:
 - Question 5: Are there exceptional circumstances to alter the Green Belt in the district in principle? If so, what are they? If not, how could housing and employment requirements be met in other ways?
 - Question 10: Should the Local Plan identify safeguarded land?



- 1.6. As this Local Plan has been brought forward under the December 2023 version of the NPPF, any references throughout this Hearing Statement are to that version of the NPPF unless expressly indicated otherwise.

2. Matter 6: Green Belt

Issue: Whether the Plan's approach to Green Belt is positively prepared, justified, effective and consistent with national policy.

Question 5: Are there exceptional circumstances to alter the Green Belt in the district in principle? If so, what are they? If not, how could housing and employment requirements be met in other ways?

- 2.1. There are exceptional circumstances to review and alter the Green Belt boundaries including meeting the minimum local housing need and the significant housing shortfall across the Greater Birmingham and Black Country House Market Area (GBBCHMA)¹.
- 2.2. The Council have the choice to review and alter their Green Belt boundaries and have chosen to do so through this Local Plan, which is commended.
- 2.3. After it was concluded that it was necessary to release Green Belt land for development through the Local Plan², the Council then chose to curtail the amount of land released from the Green Belt. The result is a significant reduction in the contribution towards the unmet needs of the GBBCHMA.
- 2.4. The curtailment has been brought about because the Council have chosen to apply the exceptional circumstance case for Green Belt release to Tier 1 settlements only. Of course, Green Belt release need not be limited to the Tier 1 settlements and given the extent of the housing shortfall across the HMA we question whether this is a suitable approach.
- 2.5. However, the main issue with the approach, is that there is available land at Tier 1 settlements which is not proposed to be released from the Green Belt, such as the remainder of the land being promoted by Miller Homes. This land could contribute towards the unmet housing need of the GBBCHMA but is omitted from the Local Plan.
- 2.6. Green Belt release from Tier 1 settlements has been limited by other constraints³. However, we dispute that there are constraints that render the remainder of the land being promoted by Miller Homes unsuitable for housing allocation as fully set out in the Regulation 19 representations⁴.
- 2.7. For example, the only difference in constraints between Site 536a and the land to the west, is the proximity to the Grade II Listed Landywood Farmhouse. It is clearly set out in the Regulation 19 representations that the potential for harm cause by the development in the west could only be less than substantial, which could be mitigated by the layout, screening, and provision of open space to further lessen or remove harmful impact.

¹ EB16

² PC1

³ EB20

⁴ https://www.sstaffs.gov.uk/sites/default/files/2024-12/agt24-030-03-15_pegasus_group_for_miller_homes_rep.pdf

- 2.8. On this basis it is considered that there are exceptional circumstances to release more land from the Green Belt, such as that being promoted by Miller Homes.

Question 10: Should the Local Plan identify safeguarded land?

- 2.9. This Local Plan is predicated on a local housing need of 227 dwellings per annum (dpa) whereas the local housing need currently stands at 651 dpa.
- 2.10. If this Local Plan is adopted, the Council will be expected to then begin work on a new plan to address the shortfall in housing need. This is because the housing requirement in the Local Plan meets significantly less than 80% of local housing need⁵.
- 2.11. The next Local Plan will require a step-change in housing delivery and this Local Plan could be of tremendous assistance by identifying safeguarded land.
- 2.12. The next Local Plan would need to be adopted within 30 months (2.5 years) of starting the process. Safeguarding land now as part of this Local Plan would mitigate the obstacle of Green Belt release during the preparation of the next Local Plan and make this ambitious timescale a more realistic prospect.

⁵ December 2024 NPPF, para 236

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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