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COMMERCIAL PROPERTY ADVICE



## **SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION HEARING STATEMENT**

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### **MATTER 6: GREEN BELT**

**On Behalf Of:**  
Redrow Homes

**Prepared By:**  
John Pearce, BSc (Hons) MTPL MRTPI  
Harris Lamb | 4<sup>th</sup> Floor | 4 Brindley Place | Birmingham | B1 2LG  
Telephone: 0121 455 9455 Facsimile: 0121 455 6595 E-mail: [john.pearce@harrislamb.com](mailto:john.pearce@harrislamb.com)

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Date: 11<sup>th</sup> April 2025

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**Main Contributor**

**John Pearce, BSc (Hons) MTPL MRTPI**

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**Issued By**

**Signature:**

A handwritten signature in black ink, appearing to read 'J Pearce', with a large, sweeping underline that extends to the right.

**Print Name: John Pearce**

**Date: 11<sup>th</sup> April 2025**

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## **1.0 INTRODUCTION**

## **2.0 RESPONSE TO INSPECTOR'S MATTERS AND ISSUES**

## **1.0 INTRODUCTION**

- 1.1 We are instructed by Redrow Homes ("**RH**") to submit written responses to the Inspector's matters and issues identified in respect of Matter 6 of the South Staffordshire Local Plan examination.
- 1.2 RH are promoting land at Castlecroft Farm as a proposed residential led development to accommodate approximately 600 homes. The land at Castlecroft Farm is located in close proximity to the built up edge of Wolverhampton City and is being promoted on the basis of either meeting the needs arising within South Staffordshire or meeting unmet needs arising within the wider housing market area. Our response to the Inspector's matters and issues should be read with that objective in mind and we set out our detailed response to the questions below.

## **2.0 RESPONSE TO INSPECTOR'S MATTERS AND ISSUES**

**Question 1 – What proportion of the District is currently designated as Green Belt? How would this change as a result of the proposals in the Local Plan? What proportion of new housing and employment proposed in the Plan would be on land currently designated as Green Belt?**

- 2.1 Approximately 80% of the District is currently designated as Green Belt. The remaining 20% consists of the settlements and a small area to the north of the District.
- 2.2 Green Belt boundaries are drawn tight to the settlements and there is limited urban capacity. Opportunities for new development in the settlements have been explored and maximised in the last two versions of the local plan. What this means is that the opportunities for new development within the settlements are limited and opportunities outside of settlement boundaries are essential if the development needs identified are going to be met.
- 2.3 With such a high proportion of the District being designated as Green Belt, it is inevitable that Green Belt sites need to be released. An alternative approach of trying to cram all the development needs into the small area of non-Green Belt land to the north of the district would lead to contrived and unsustainable distribution of development, away from most of the settlements within the District.
- 2.4 Currently 0.16% of the districts green belt is proposed to be released.

**Question 2 – The National Planning Policy Framework identifies that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries a strategic policy making authority should be able to demonstrate that it has fully examined all other reasonable options for meeting its identified need for housing. Have all opportunities to maximise the capacity on non-Green Belt land been taken? As such:**

- a. How has the Council sought to make as much use as possible of suitable brownfield sites and underutilised land?**
- b. Has the potential for development in the urban area, the use of previously developed land and increased densities been optimised including locations well served by public transport?**
- c. Has the Council assessed whether there is any realistic potential to accommodate some of the development needs of the district in other authority areas, reducing the need to alter the Green Belt? How has this been assessed/ investigated?**
- d. The need to promote sustainable patterns of development. Where is this evidenced?**

2.5 The Council has done a thorough review of brownfield sites and underutilised land. This follows on from the work that underpinned the adopted land plan, which released sites from the Green Belt to help deliver the development needs identified at that time and which also safeguarded additional Green Belt land to provide flexibility should more sites be needed. Sufficient land was not available at that time and the evidence clearly shows that insufficient land is available to meet the development needs identified this time round as well.

2.6 Adjoining authorities are already under significant pressure to meet their own needs and the wider unmet housing need from the GBBCHMA. Not only are they not in a position to assist with South Staffordshire's housing need, the available evidence clearly supports South Staffordshire taking substantially more of the of the unmet housing need due to its functional relationship with the conurbation.

**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?**

- 2.7 Yes, there is clear evidence to justify the release of Green Belt to meet the housing and employment needs of South Staffordshire. There is also clear evidence to support the release of Green Belt land to assist in meeting the employment needs and housing needs arising from the GBBCHMA.
- 2.8 Our concern is that the evidence available clearly demonstrates that the contribution to the unmet need arising from the GBBCHMA should be substantially greater and yet South Staffordshire are trying to incorrectly hide behind the provisions of Paragraph 145 of the NPPF.
- 2.9 Notwithstanding the fact that a key piece of evidence is missing to provide the latest position on the unmet need within the GBBCHMA, it is reasonable to conclude that the unmet need is substantial. The latest estimate presented in the GBBCHMA Statement of Common Ground Regarding Housing Shortfall dated 29<sup>th</sup> November 2024 is an unmet need of 76,427 dwellings to 2042, with South Staffordshire being only one of only a small number of authorities in a position to be able to assist with meeting this need.
- 2.10 The need is massive and represents a home for 76,427 families/households. This is significant and this scale of need clearly demonstrates exceptional circumstances.
- 2.11 The West Midlands Green Belt was introduced in 1975 and has been successful in restricting urban sprawl and securing urban renewal. However, it has now served its purpose and by any measure the development needs cannot be met within the existing urban areas. This does not mean that plans are not continuing to seek urban renewal where they can, but the Green Belt now needs to be reshaped if the development needs are going to be met.

- 2.12 The Council are arguing it is in their “gift” to release Green Belt because of Paragraph 145 of the NPPF. As soon as the draft version of the December 2023 NPPF was published they dropped their approach to addressing the unmet need (which in itself was not sufficient) in favour of further reducing the level of Green Belt release to an arbitrary and nominal figure of 640 dwellings. We do not agree with this. The reasons for this are set out below.
- 2.13 The December 2023 NPPF does not say Green Belt land should not be released to meet development needs.
- 2.14 What the December 2023 NPPF does say is that to be positively prepared the plan should be informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. Green Belt is a policy construct, it is not an environmental policy in its own right. Where it has fulfilled its function, which is the case here, then it stands to reason that its release should not hold the same weight, particularly when done in a considered and informed way. This could easily be achieved here and there are a range of locations that could assist with delivering housing without compromising any ongoing function the Green Belt might have, including our client’s site.
- 2.15 Paragraph 145 only states there is no requirement for Green Belt boundaries to be reviewed or changed. It goes on to state that Authorities may choose to review and alter Green Belts where exceptional circumstances are fully evidenced and justified. In this case, the Council has chosen to review and alter its Green Belt boundaries. They have reviewed and altered it to meet their housing and employment needs, and to meet the unmet housing and employment needs from the GBBCHMA. So, it is considered this is not a debate about whether they should or should not review and alter their Green Belt boundaries, but a debate about the extent of Green Belt release now that the Council has chosen to review and alter its Green Belt. On this point, the evidence available overwhelming supports the release of substantially more land to help meet the unmet housing needs.



- 2.16 It is, therefore, considered that the plan has not been positively prepared and is not an appropriate strategy.

**Question 10 – Should the Local Plan identify safeguarded land?**

- 2.17 Green Belt boundaries are supposed to be able to endure beyond the plan period (Paragraph 145 of the NPPF). Consequently, only allocating enough land for the current needs is not sufficient to fulfil the requirements of Paragraph 145 of the NPPF.
- 2.18 When looking ahead to what the development needs might be at the end of the plan period, we are in a relatively unique position here in that if the plan is accepted in the current format (i.e. with the current housing requirement), we already know that an immediate review will be required and we have a good understanding of what the housing needs will be as part of that review. We also know there is a significant unmet need arising in the GBBCHMA, that this is highly unlikely to be met this time round with the small contributions being made by authorities with land available (i.e. the current contributions of the various authorities only make a very small dent in the latest estimate of unmet need) and that the new version of the NPPF promotes the review of the Green Belt to meet development needs. Consequently, we know that a huge wave of development is highly likely to be coming to South Staffordshire and the need beyond the end of the plan period will be allot higher than the current emerging plan.
- 2.19 When this comes to Paragraph 145 and the requirement for Green Belt to endure beyond the plan period, we need to consider what this means for the 2041 onward. What we know from the above is that the annual requirement rolling beyond 2041 is likely to be substantially higher (e.g. the housing requirement in the review could comfortably be at least 3 to 7 times more than the current requirement).

- 2.20 Understanding the likely development pressures beyond the plan period are an important factor in considering whether Green Belt boundaries would endure beyond the plan period. We are in a unique position of having a view of what the development needs might be at that time and the Council's approach to not safeguard/release more Green Belt to fulfil this requirement does not meet any interpretation of what this information tells us.

**Question 11 – Are any amendments required to the wording of Policy DS1 for soundness?**

- 2.21 Yes, whilst the plan is being examined under the December 2023 version of the National Planning Policy Framework (NPPF), from adoption it will be operating side by side with the December 2024 version of the NPPF for decision making. There would be no value in adopting policies that would be rendered out of date in full or in part on adoption because they are out of kilter with December 2024 NPPF, and we consider that Policy DS1 should be amended accordingly.
- 2.22 In particular, we consider that reference to Grey Belt sites should be made in the policy, along with the provisions of Paragraph 155 which explains when development on Grey Belt sites will be considered appropriate development in the Green Belt. Doing this will ensure consistency with the latest version of the NPPF and allow the policy to remain consistent with the NPPF on adoption of the plan.
- 2.23 Reference should be made to Safeguarded sites or additional Green Belt release to ensure the Green Belt boundaries endure beyond the plan period.

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