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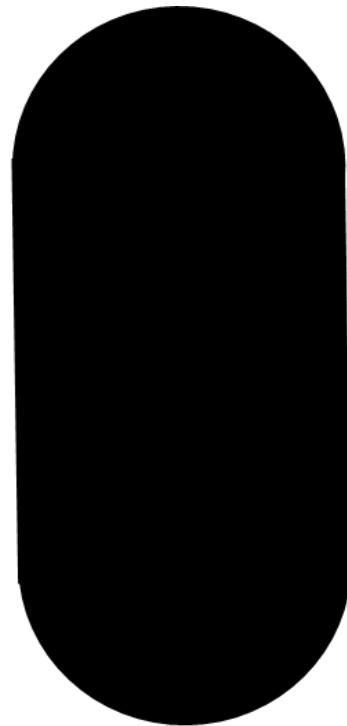
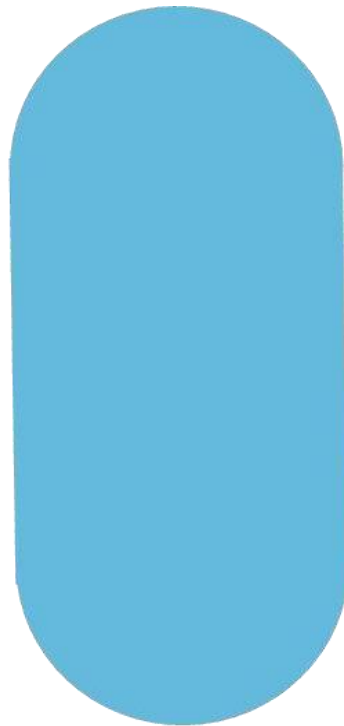
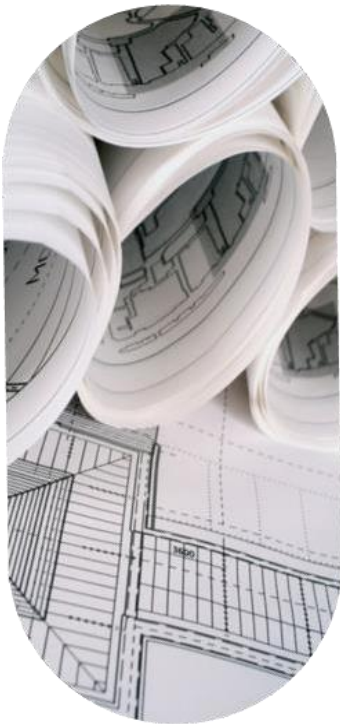
South Staffordshire Local Plan

Examination in Public

Matter 6 – Green Belt

Boningale Group Ltd

April 2024



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Matter Number	Author		Checked/Approved	
Draft	MW	01-04-2025	Client	
Final	MW		Client	
Revision				

1. Introduction

- 1.1. This response to Matter 6 of the Inspectors' MIQs in respect of the South Staffordshire Local Plan (SSLP) Examination in Public has been prepared by Marrons on behalf of Boningale Group Ltd. Marrons have been instructed to appear at the Examination on behalf of Boningale Group Ltd.
- 1.2. This hearing statement should be read alongside previous representation to the Regulation 19 Consultation submitted by Marrons on behalf of Boningale Homes Ltd and should be considered in the context of support for a plan led system.
- 1.3. Acting on behalf of our clients, Marrons will attend the Matter 6 Hearing Sessions and will make further oral submission on behalf of our client. This statement outlines Boningale Group's comments in respect of Matter 6, with responses to the Inspectors' MIQs (Matter 6) set out below.
- 1.4. Boningale Group are a SME local housebuilder and land promoter based in Shropshire and are currently building out a high-quality development at 'Millfields' in Albrighton, in neighbouring Shropshire. They are actively promoting the following sites in South Staffordshire;
 - Codsall South (Appendix A)
 - Hockerhill Farm, Brewood (Appendix B)
 - Coven Road, Brewood (Appendix C)
 - Boscobel Lane, Bishops Wood (Appendix D)
 - Clive Road, Pattingham (Appendix E)
 - Bridgnorth Road, Stourton (Appendix F)
- 1.5. The Hockerhill Farm, Brewood site is subject to a live planning application for up to 100 residential dwellings. The Boscobel Lane, Bishops Wood site is subject to a Section 78 Appeal against the refusal of planning permission for up to 100 residential dwellings and a community shop.
- 1.6. In order to assist the Inspectors', the contents of this submission and the submissions made in respect of other Matters, demonstrate that the submission version of the Plan is not, in our assessment, capable of being found sound, without significant additional evidence and the identification of additional sites to accommodate housing growth over the Plan period.
- 1.7. These submissions reflect the recent position outlined by Housing Minister Matthew Pennycook and the Chief Executive of the Planning Inspectorate with regard to the

continued use of ‘pragmatism’ in the Examination of Plans and the recognition that any fundamental issues or areas of additional work that require a pause of more than six-months in the Examination process, should indicate that a Plan is not capable of being found sound. As such aligned with the above consideration, in the current context, we do not believe that the Plan is capable of being found sound noting that the degree of additional work we consider to be required to make the Plan sound would likely require a pause in the Examination in excess of 6-months.

- 1.8. We consider that the Sustainability Appraisal process is totally flawed, to the extent that it is unlawful, as it does not meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the SEA Regulations”). There has been a failure to consistently and robustly consider reasonable alternatives contrary to Regulation 12 and Schedule 2, paragraph 8. As such we do not consider that the Plan is capable of being found sound.

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

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. The submission version of the Plan confirms that 80% of South Staffordshire is located within the Green Belt.

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?

2.2. For the Council to answer.

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?

2.3. For the Council to answer.

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?

2.4. For the Council to answer.

d. The need to promote sustainable patterns of development. Where is this evidenced?

2.5. For the Council to answer.

3. How has the assessment of Green Belt land informed the Local Plan and specifically proposals to alter the Green Belt to accommodate development needs?

- 2.6. The Council have not appropriately or sufficiently assessment Green Belt across the Plan area. The Green Belt Study was prepared in 2019 and assessed significant swathes of land against the purposes of the Green Belt, but failed to assess smaller more deliverable sites.
- 2.7. The result of this, is an overinflation of the assessment against the purposes of the Green Belt.
- 2.8. Given the Council changed approach to Green Belt post NPPF23, it is clear that there has been no assessment of reasonable alternatives within the Green Belt both within and outside of Tier 1 settlements.
- 2.9. My clients have promoted several sites to the Council since this point, none of which have been considered by the Council for the purpose of the Plan to any acceptable degree.
- 2.10. Had a robust and justified assessment of the Green Belt as a whole been completed, we would expect that the Council would find significant areas that do not contribute strongly or indeed at all to the purposes of the Green Belt, including my clients land at Codsall South, Brewood and Bishops Wood.
- 2.11. We are further very concerned, as discussed in our Matter 1 Statement, that the Council have conflated the Green Belt with landscape. We remind the Council that Green Belt is a planning policy only and a sites presence within the Green Belt does not indicate that it has any landscape significance.

4. How has the Council assessed the suitability of land parcels and their contribution towards the purposes of including land in the Green Belt?

- 2.12. As detailed above, no, we do not consider that the Council have assessed the suitability of land parcels and their contribution towards Green Belt purposes.



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