



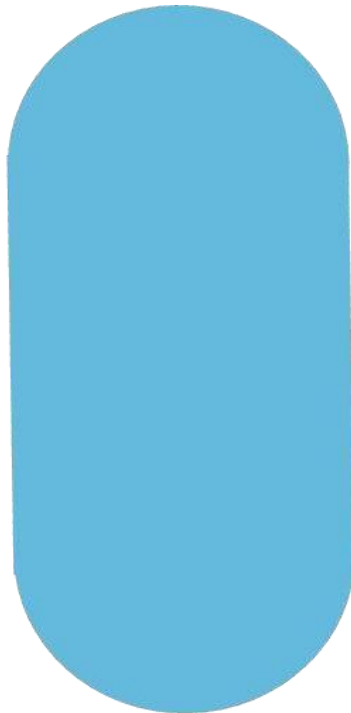
 Part of Shakespeare Martineau

Statement in Respect of the South Staffordshire Local Plan Examination

Matter 6 – Green Belt

On Behalf of Catesby Estates

April 2025



1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Marrons on behalf of Catesby Estates with respect to Matter 6 - Green Belt.

2. MATTER 6 – GREEN BELT

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

Q4: How has the Council assessed the suitability of land parcels and their contribution towards the purposes of including land in the Green Belt?

- 2.1 The Council have undertaken a Green Belt Study (2019; EB18) and Addendum (2022; EB17) to inform the preparation of the Local Plan.
- 2.2 However, Catesby Estates contend that the assessment of land parcels in the Green Belt Study, and resultant impact on the assessment of suitability of sites for Green Belt release and allocation in the Local Plan, is unjustified.
- 2.3 In the case of Catesby Estates' interest at Land off Bridgnorth Road, Wightwick (Strategic Housing and Economic Land Availability Assessment (SHELAA) Site 260), the Site is categorised as falling within parcel S59 which measures a total of 487.8ha. Parcel S59 is considered to perform strongly against the Green Belt purposes of checking unrestricted sprawl and safeguarding the countryside from encroachment. Parcel S59 is broken down into sub-parcels, with Land off Bridgnorth Road falling within S59C which measures 143.8ha in total and is also identified as performing strongly against the Green Belt purposes of checking unrestricted sprawl and safeguarding the countryside from encroachment.
- 2.4 However, it is considered that an individual assessment of the Site, which measures circa 7.8ha and is thus far less significant in terms of the scale of assessments undertaken in the Green Belt Review in this location, would identify the site as being able to be developed without
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having a significant impact on the purposes of the Green Belt.

- 2.5 With regard to checking unrestricted sprawl, the Green Belt Review assessment of parcel S59C finds that “land is adjacent or close to the large built-up area, contains no or very limited urban development, and has strong openness. It retains a relatively strong relationship with the wider countryside”. Whilst the Site does not contain urban development, aside from the existing dwelling known as Cherringham, it is effectively surrounded by built development to the north, east and south. In turn, the level of openness of the Site is considered to be far more limited than the wider S59C parcel. The same can also be said with regard to the Site’s relationship with the urban area which is considered to be far stronger than with the wider countryside. Thus, the contribution of the Site to checking unrestricted sprawl cannot be considered strong, more likely weak or moderate at most.
- 2.6 In terms of safeguarding the countryside from encroachment, the Green Belt Review assessment of parcel S59C finds that “land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside”. Again, whilst the Site does not contain urban development, aside from the existing dwelling known as Cherringham, it is effectively surrounded by built development to the north, east and south. In addition, given the location of the Site it is clear that its relationship with the urban area is far stronger than with the wider countryside. Thus, the contribution of the Site to safeguarding the countryside from encroachment also cannot be considered strong, more likely weak or moderate at most.
- 2.7 In response to Catesby Estates’ 2024 Regulation 19 representations (reference AGT24-027-03) on Policy SA3, as set out in CD5, the Council identify that “the Green Belt Study takes a strategic view for considering the harm of releasing land from the Green Belt” but that “the methodology ensures that if there are variations to the harm of releasing land from the Green Belt within the wider land parcel, then this is reflected in the assessment results”. This is not accurate.
- 2.8 Combined with the wider Spatial Strategy, it is clear that the role of the
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Green Belt Study has been fundamental in shaping the growth proposed in the Local Plan. As such, and as evidenced through the review of Land off Bridgnorth Road, Wightwick, Catesby Estates contend that the Green Belt Study is insufficient in providing reasonable evidence for the purposes of the preparation of the Local Plan.

- 2.9 The Local Plan is therefore not justified and thus unsound in line with National Planning Policy Framework (NPPF, December 2023) Paragraph 35 b).

Q5: 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?

- 2.10 Catesby Estates agree that there are exceptional circumstances which support alteration to the Green Belt in South Staffordshire, comprising the inability of the Council to meet its own housing requirement outside of the Green Belt and given the significant level of unmet need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 2.11 The NPPF is clear at Paragraph 147 that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account, and consideration should be given to channelling development towards urban areas.
- 2.12 Aligned with Catesby Estates' Hearing Statements on Matters 2 and 5 in particular, it is considered that a more meaningful contribution to the GBBCHMA in the Local Plan and that growth should be directed to the urban edge of Wolverhampton, including through Green Belt release and allocation of Land off Bridgnorth Road, Wightwick.

Reiss Sadler
Marrons
10th April 2025

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