



HEARING STATEMENT

in respect of
South Staffordshire Local Plan Examination Matter 6
on behalf of
UKLD Ltd

10 April 2025

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1. Introduction

- 1.1. This hearing statement is made by RCA Regeneration Ltd on behalf of UKLD Ltd to the South Staffordshire Local Plan (SSLP) EIP.
- 1.2. This statement relates to Matter 6 – Green Belt.
- 1.3. We have not provided answers to all questions under this heading and have only offered answers where we consider it to be necessary.

2. Matter 6: Green Belt

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

Are there exceptional circumstances to justify the release of Green Belt land for development in Tier 2, 3 or 4 settlements?

- 2.1. In our view, yes. The Tier 1 settlement/'rail-based' strategy being promoted by the Council would not deliver sufficient housing land to meet the requirement we would support (taking the previously agreed unmet need figure of 4,000 new homes) and it remains our view that more sites (including those in the Green Belt) should be considered in order to meet the shortfall.
- 2.2. This arguably represents the exceptional circumstance required to justify Green Belt releases in sustainable locations adjacent to the existing urban areas. Para 147 of the NPPF states that:
- 2.3. *'When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking 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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'* (our emphasis)
- 2.4. There is no imperative for public transport to consist of railways only and for sites within the Green Belt with good access to the main urban area of (for instance) Wolverhampton, it is clear that these should be prioritised for release, particularly as they relate most closely to an area with significant unmet need.
- 2.5. Unfortunately, the Council appear to be severely restricting any housing release on Green Belt land. When the Council had been employing a more realistic and sensible approach of meeting far more of the unmet need from neighbours, Green Belt release was being taken seriously, but arbitrarily reducing the housing requirement now seems to mean that any release of Green Belt sites for housing would undermine the purposes and openness of the wider Green Belt – an approach we consider to be unrealistic and unsound.
- 2.6. The true housing requirement for South Staffordshire (including meeting far more of the unmet need of neighbours) cannot be met in full on previously developed land within existing built-up areas. However, nor can the reduced housing requirement, necessitating the use of safeguarded sites that were once Green Belt, as well as non-Green Belt agricultural land.

Question 2 Should the Local Plan identify safeguarded land?

- 2.7. Yes. This is brought in to sharp focus under the transitional arrangements (Dec 2024 NPPF) with the need to immediately review the local plan upon adoption because it does not contain 80% of its housing requirement, and further compounded by the need to add 20% buffer to the Council's housing land supply in July 2026. Whilst this plan is clearly being examined under an older version of the NPPF, the transitional arrangements and obligations placed on the Council cannot be ignored, nor can be kicked down the road. As an absolute minimum, the provision of

safeguarded land should have been included in this plan to allow for (what is now inevitably) a reduction in housing land supply and the writing being on the wall for a huge jump in the housing requirement.

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