

## **South Staffordshire Local Plan Review**

### **Response to Inspector's Matters Issues and Questions (MIQs) on behalf of Clowes Developments**

**Representor ID: AGT24-037-02**

#### **Matter 6: 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:**

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

We do not consider that the Council has maximised its ability to promote sustainable patterns of development. Green Belt, although an important consideration, is not the only consideration when making a judgement on the sustainability of sites for development.

Greater consideration should be given to the sustainability credentials of directing development towards the edge of the Black Country. Such development should be assessed from a sustainability perspective in the same way that it is considered positive to develop adjacent to existing settlements such as Wordsley. Without consideration of LPA boundaries, the Black Country conurbation is in effect a collection of individual settlements, with a range of infrastructure such as shops and services already in existence.

Lawnswood is classed as a tier 5 settlement. The Council's strategy, as set out in Policy DS5, is that these settlements are not intended to experience further housing growth. If the site was only adjoining Lawnswood and isolated from other areas, it may be considered appropriate to rule out development of the site. However the site at Lawnswood Road is not in this position. It adjoins the urban area of Wordsley which is linked to the wider Black Country conurbation.

The adopted Dudley Borough Development Strategy states that Wordsley is a local centre (Tier 3). The edge of the Local Centre itself is approximately 1 mile from the centre of the site, with the wider Wordsley settlement bordering the site. A number of shops and services are also located closer to the site, outside of the local centre.

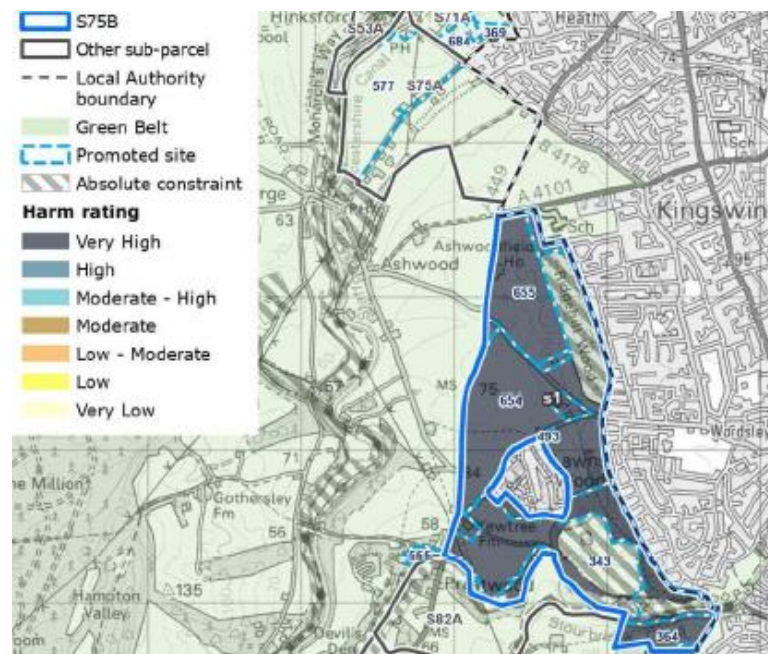
This approach is supported by paragraph 147 of the NPPF which states that the need to promote sustainable development should be considered when reviewing Green Belt Boundaries. It states that the consequences of channelling development towards areas outside the Green Belt should be considered when reviewing Green Belt boundaries.

Sustainable patterns of development should not just be approached by looking inwards to what is in the SSDC boundary only. Opportunities that could be derived from adjacent existing settlements should be explored (e.g. Wordsley in Dudley Borough). It appears that SSDC have not given due consideration to neighbouring settlements in promoting sustainable patterns of development, and is therefore not consistent with national policy or suitably justified.

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

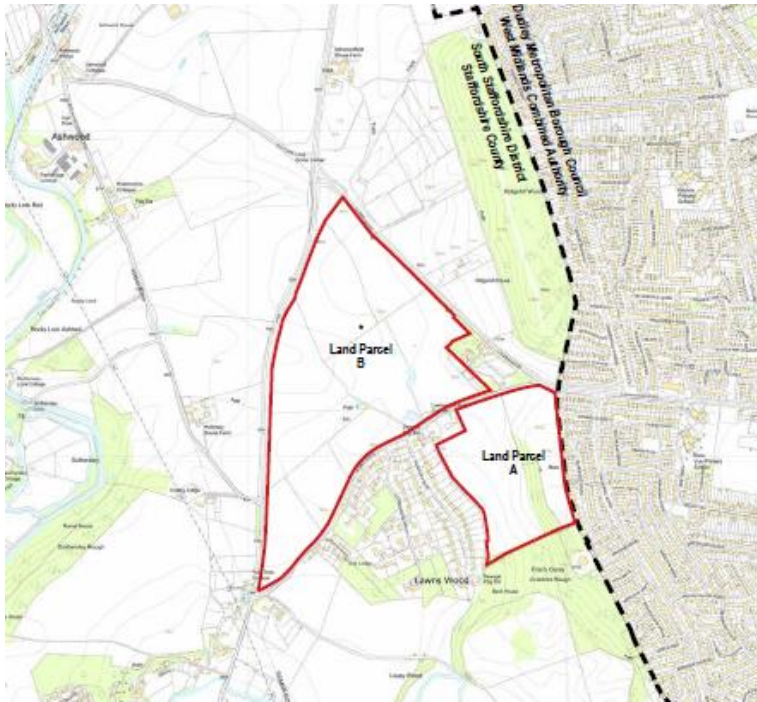
Land at Lanwswood Road has been analysed in studies produced by LUC on behalf of South Staffordshire Council in July 2019.

As highlighted in our representations to the previous Housing Strategy and IDP consultation in December 2019, it is the case that the Green Belt study has produced conclusions based on wider parcels of land, and assessments were not undertaken at a site specific level. The plans below demonstrate the contrast between the overall parcel assessed by LUC and the specific parcel covered in FPCR's assessment, prepared on behalf of Clowes Developments:



Government guidance related to Green Belt, which provides advice on the role of the Green Belt in the planning system was updated in February 2025. This states that assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes. It goes on to state that authorities should consider where it may be appropriate to vary the size of assessment areas based on local circumstances.

For example, the assessment of smaller areas may be appropriate in certain places, such as around existing settlements (such as Wordsley, in Dudley Borough). Although this guidance was recently published, it should be taken into consideration through a review of the Green Belt assessment. This would ensure that suitable justification is provided in the evidence base for the Council's decision regarding Green Belt release.



Within LUC's Green Belt Assessment for SSDC, the site formed part of an area of land described as Parcel S75B. The study concluded a "very high" harm rating, for removal of the parcel from the Green Belt. A more detailed analysis has been undertaken by FPCR (submitted with previous representations) and concluded that parcel B, north of Lawnswood Road, would have a "moderate" harm rating for removal from the Green Belt. parcel A, south of Lawnswood Road, would have a "low/moderate" harm rating for removal from Green Belt. The table below shows the contrasting harm assessments:

Report Author	Parcel A – South of Lawnswood Road	Parcel B – North of Lawnswood Road
LUC (on behalf of SSDC)	Very High	Very High
FPCR	Low / Moderate	Moderate

The LUC report sets out a range of potential measures to mitigate harm, depending on the circumstances.

These measures include:

- Using landscaping to help integrate a new Green Belt boundary
- Enhancing access within the Green Belt.

It should therefore be considered that if a site specific approach to the value of Green Belt, along with consideration of potential enhancements that development of the parcels for residential development should be supported.

Furthermore, we agree with para 7.10 of the Green Belt assessment which makes the point that Green Belt harm is not the only factor to be considered when weighing up whether to release land for development. This approach is supported by paragraph 147 of the NPPF which states that the need to promote sustainable development should be considered when reviewing Green Belt Boundaries. It states that the consequences of channelling development towards areas outside the Green Belt should be considered when reviewing Green Belt boundaries. The approach taken to Green Belt assessment and conclusions drawn from it are therefore not consistent with national policy nor suitably justified.

## **10. Should the Local Plan identify safeguarded land?**

As 80% of the District is Green Belt (Table 5 of the Publication Plan), future Green Belt release is likely to be inevitable to meet housing needs as required in this plan period. Clowes therefore considers that the plan is not consistent with national policy (NPPF Paragraph 35), and safeguarding of Green Belt land is likely to be required.

Clowes object to Policy DS1 as written, because it is not justified. SSDC is not proposing to safeguard any land for development. Given the significant shortfalls arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), the uncertainty surrounding how they will be dealt with, and that SSDC will need to review their Local Plan in the short term to accommodate more growth, including that from the GBBCHMA.

Clowes considers that the plan is not consistent with national policy (NPPF Paragraph 35), and safeguarding of Green Belt land is likely to be required given the significant shortfalls arising from the GBBCHMA and the uncertainty surrounding how they will be dealt with. Therefore the plan should be modified to include Green Belt Safeguarding to meet this existing and emerging need.