

Matter 6 – Issue 1

Question 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?

The proposed release of Green Belt to accommodate development needs has not been informed by the Green Belt Assessment, it has instead been driven by South Staffordshire District Council's ('SSDC') interpretation of the National Planning Policy Framework ('NPPF') 2023. The Publication Plan (document reference CD1) proposes a reduction to the level of Green Belt release from that previously proposed and evidenced in the 2022 Publication Plan (document reference PC1). More Green Belt release was supported in the 2022 plan and was sufficiently evidenced. SSDC has reduced the level of Green Belt proposed and their approach to Green Belt release is not consistent.

Question 4.

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

There has been an inconsistent approach taken to the assessment of sites in the Sustainability Appraisal 2024 (document references EB1 – EB2b). There are dismissed sites which perform comparatively to the sites proposed to be allocated Tier 1 settlements which have not been allocated for residential development. For example, site reference 222 (Land north of Sandy Lane) which is adjacent to the north of Codsall, a Tier 1 settlement. This site is in the Green Belt and assessed as having moderate-high harm to the Green Belt but performs equally as well when compared against site reference 224 (Land adjacent to Station Road), which is proposed to be allocated (Policy SA3), in Table H.4.1. of the Sustainability Appraisal. This approach is not justified or effective in terms of plan making.

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?

SSDC has concluded that there are exceptional circumstances to release land from the Green Belt which we agree given the majority of sustainable settlements in the District are constrained by Green Belt and there are not a sufficient number of brownfield sites to meet the identified housing and employment needs of the District as well as those of the wider Housing Market Area ('HMA'). However, SSDC have not justified why there were exceptional circumstances to justify the release of 4,000 dwellings but now only 640 dwellings can be accommodated.

Question 6.

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

There are sites adjacent to Tier 2 and 3 settlements proposed to be released but no justification has been provided on why they should be released above other sites which would deliver significantly more benefits and be in closer proximity to meeting the needs of the wider HMA, for example the Cross Green (Policy SA2 of Publication Plan 2022) and Linthouse Lane (Policy SA3 of Publication Plan 2022) sites which were previously proposed to be allocated to specifically meet the Black Country's housing needs (Draft Policy DS5 of Publication Plan 2022).

Question 7.

Do the Plan's strategic policies set out the scale and need for the release of land from the Green Belt as required in the National Planning Policy Framework?

There is no confirmation in the Publication Plan which summarises the level of Green Belt release required to meet identified housing needs.

Question 10.

Should the Local Plan identify safeguarded land?

Safeguarded land should be identified. In light of our responses to the wider matters and comments on the need to identify additional housing sites to meet identified needs, if the plan is found sound without identifying additional sites, safeguarded land should be proposed (and released from the Green Belt) so it can be delivered should SSDC not be able to demonstrate a Five Year Housing Land Supply before their Local Plan is reviewed.

As land at Cross Green (Policy SA2 of Publication Plan 2022) and Linthouse Lane (Policy SA3 of Publication Plan 2022) has previously been proposed as allocations, there is sufficient evidence available, without SSDC having to do significant work, to demonstrate that these sites are still suitable, available and deliverable for development. Both sites are suitable options to be safeguarded for development as a minimum. This approach would be a positive recognition towards the immediate need for an early plan review.