

South Staffordshire Local Plan examination – matter 6 (Green Belt)

Barratt David Wilson

April 2025

Introduction

1. This statement is submitted on behalf of Barratt David Wilson ('BDW') in response to the Inspector's matters, issues and questions to the South Staffordshire Local Plan.
2. BDW is promoting land at south of New Road, Featherstone (site ref: 396). Details regarding the site can be found in DBW's representations to the 2024 reg 19 publication plan consultation.
3. We have responded to the questions most relevant to BDW's interests at Featherstone.

Issue 1 Questions

Q1. 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?

4. This is a question for the Council.
5. P19 of the 2025 reg 19 publication plan and p3 of the Green Belt Topic Paper (EB16) confirms circa 80% of the district is designated as Green Belt.

Q2. 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?

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?

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?

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

6. The Council has evidenced through the Green Belt Topic Paper (EB16) (particularly paras 4.14-4.20) that it cannot deliver even the lower NPPF 2023 LHN plus a reduced contribution to the GBBCHMA on land beyond the Green Belt (such as brownfield land).
7. It is not an option for neighbouring authorities to accommodate any of the district's needs to reduce the need to alter the Green Belt. The GBBCHMA SoCG regarding housing shortfall (November 2024) (SST/ED11) (signed by officers only) sets out that there is a minimum shortfall of 76,327 homes up to 2042 across the wider HMA.

Q3. How has the assessment of Green Belt land informed the Local Plan and specifically proposals to alter the Green Belt to accommodate development needs?

8. No comment.

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

9. This is a question for the Council.

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?

10. Yes, there are. As per our response to Q2 above, the Council has evidenced it cannot meet its own housing need without altering Green Belt boundaries, notwithstanding the Council's intention to contribute to GBBCHMA unmet needs also. This pressing housing need represents exceptional circumstances for altering Green Belt boundaries.

Q6. Are there exceptional circumstances to justify the release of Green Belt land for development in Tier 2, 3 or 4 settlements?

11. The Council should firstly be seeking to meet a higher housing need (circa 9,130 homes, as per the options considered in the Sustainability Appraisal). The 2022 reg 19 publication plan demonstrated that the district had environmental and infrastructure capacity to meet this level of need sustainably, including at Tier 3 settlements such as Featherstone. This housing need is sufficient to justify releasing Green Belt land for development at Featherstone, particularly in light of our response to Q2 and there being no option to meet any of South Staffordshire's needs in neighbouring authorities.

Q7. 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?

12. No comment.

Q8. Are all detailed amendments to boundaries to the Green Belt clear and addressed in the evidence?

13. No comment.

Q10. Should the Local Plan identify safeguarded land?

14. Yes.
15. As per our Matter 5 hearing statement and response to Q1 above, the Council should be meeting a higher housing requirement closer aligned with its NPPF 2024 LHN.
16. This is because as per NPPF 2024 paras 236 and 237, if adopted as proposed, the requirement is significantly less than 80% of NPPF 2024 LHN, and therefore the Council is expected to have a new plan submitted by examination by 12 June 2026.

17. South Staffordshire's current development plan already contains a policy requiring an early review of its plan (policy SAD1). That policy required the review to be submitted for examination by the end of 2021, yet this plan was not submitted until 2024, three years later and approx. 13 years after the CS was adopted). The result of this is that South Staffordshire cannot currently demonstrate a five year housing land supply ('5YHLS'), by the Council's own calculation the supply stands at 1.17 years.
18. Given the above, it is a significant risk for South Staffordshire to again rely on an immediate review of the plan, to ensure it is able to maintain a 5YHLS over more than a five year period post adoption of its plan. For the plan under examination to be considered justified and positively prepared, it should be planning for greater growth, which aligns with the NPPF 2024 LHN, now.
19. Failing this, the plan should at least be identifying land to be removed land from the Green Belt and safeguarded for future development needs, as the current development plan does. This will at least provide a 'backstop' should South Staffordshire not advance a review of its plan within the timescales prescribed by the NPPF.
20. Safeguarded land can then come forward before a plan review, should the Council no longer be able to demonstrate a 5YHLS, which is the current situation with land identified as safeguarded land in the development plan coming forward now through the development management process.
21. Given Featherstone's range of facilities and services, and its proximity to where the majority of the district's employment growth is being directed, at i54, the West Midlands Interchange and the ROF Featherstone employment site (as recognised at para 2.3 of the 2024 reg 19 publication plan), it has the capacity for greater growth. As such Featherstone, and in particular DBW's site to the south of New Road (site ref: 396) is a logical location for being removed from the Green Belt and identified as safeguarded land for future development.

Q11. Are any amendments required to the wording of Policy DS1 for soundness?

22. Yes.
23. It needs to incorporate the provision of safeguarded land, as per our response to Q10 above.

Q12. Are the provisions of Policy DS2 on Green Belt Compensatory Improvements clear, justified and consistent with national policy and will it be effective?

24. No comment.