
SOUTH STAFFORDSHIRE LOCAL PLAN EXAMINATION

West Midlands CPRE

MATTER 6

April 2025

Matter 6: Green Belt (When responding to the questions please qualify your answers). [Focus: Policies DS1, DS2] Please Note: This issue concerns the principle and overall approach to the Green Belt. Detailed matters relating to individual site allocations and the specific implications for the Green Belt are dealt with in Matter 7.

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

Questions: 1. 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?

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: a. b. c. d. How has the Council sought to make as much use as possible of suitable brownfield sites and underutilised land? 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? 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? The need to promote sustainable patterns of development. Where is this evidenced?

WM CPRE objects to the following paragraph in Policy DS1.

The Green Belt boundary is altered through this Plan to accommodate development allocations set out in Policies SA1, SA3, and SA5. The boundaries of the reviewed

Green Belt sites are identified in Appendices B-E of this document and on the policies map.

As set out in Matter 4 we commissioned an independent report on housing numbers in the plan (attached to this objection.) That work suggested that there was a surplus of 2,292 homes in the plan.

Given that situation we do not consider 'exceptional circumstances' have been met to release Green Belt. Our objection to housing sets out the options open to the Council to address the housing surplus and until those are considered we do not believe the choice of Green Belt releases is properly justified and the allocations in SA1, SA2 and SA3 need to be reconsidered.

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?

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