



Formal Request for Clarification: "Grey Belt" Criteria & Baseline Audit

TO: Case Officer, Gillian Pinna-Morrell, Planning Department, Lichfield District Council

FROM: Burntwood Action Group & Residents

DATE: 3 January 2026

Ref: 25/01485/OUTM – Land off Church Road / Coulter Lane

Dear Gillian Pinna-Morrell,

On behalf of the Burntwood Action Group and the residents of Burntwood, I am writing to formally request clarification regarding the Council's criteria for assessing the "Grey Belt" status claimed by Bloor Homes in their Planning Statement.

We draw the Council's attention to the recent and highly relevant decision in **Doncaster (Dec 2025)**, where the Council rejected a speculative Green Belt proposal, specifically exposing the "**Grey Belt Myth**". In that instance, the Council correctly determined that land does not become "Grey" simply because it is on the urban fringe or identified by a developer as having "low performance".

We therefore ask the Council to provide a formal response to the following three points:

1. The Criteria for "Grey Belt" Classification

Does Lichfield District Council accept the applicant's self-certification of the site as "Grey Belt"? If so, what specific methodology is the Council using to verify this, given that the site remains **high-performing, functional agricultural pasture** that serves as a strategic buffer?

2. Auditing the Biodiversity Baseline

The applicant's "Grey Belt" justification relies on the land being "low-quality". However, their own **Ecological Impact Assessment (EDP8982_R002)** admits the presence of **breeding Red-List Lapwings** on site.

- **The Conflict:** Intensive ploughed cereal crops (as claimed in the BNG Metric) cannot support breeding Lapwings.
- **The Question:** Will the Council require an independent audit of the **12.07-hectare "Cereal Crop"** classification to ensure the "Grey Belt" claim is not being supported by factually incorrect biodiversity data?

3. Disengaging the "Tilted Balance"

Following the **Doncaster Precedent**, does the Council agree that **NPPF Footnote 7** and **Paragraph 11(d)i** disengage the "tilted balance" in this instance due to the site's status as protected Green Belt and its proximity to high-value heritage assets?

Summary of Resident Position

As demonstrated in the Doncaster Marr decision, "Grey Belt" rules are intended to facilitate the reuse of derelict or "sorely degraded" land, not to provide a loophole for the destruction of functional, species-rich agricultural buffers.

We look forward to your detailed response on these technical matters.

Yours sincerely,

Burntwood Action Group