



## TECHNICAL AUDIT: "GOLDEN RULE" COMPLIANCE CHECK

**TO:** Case Officer, Gillian Pinna-Morrell & S106 Officer, Planning Department, Lichfield District Council

**FROM:** Burntwood Action Group & Residents

**DATE:** 3 January 2026

**REF:** 25/01485/OUTM (Land off Church Road / Coulter Lane)

**Subject:** Rebuttal of the Applicant's 43% Affordable Housing Calculation

### 1.0 Executive Summary of the Violation

The applicant states in their Planning Statement that they are providing **43% affordable housing**, claiming this represents the **35% local base plus a 15% 'Golden Rule' uplift**. This calculation is a fundamental misinterpretation of the **National Planning Policy Framework (NPPF) 2026**.

The 43% figure is achieved by taking 15% of the 35% (approx. 5.25%) and adding it to the base. **This is not what the law requires.**

### 2.0 The Statutory Calculation (NPPF Paragraph 156-157)

Under the 2026 NPPF, the "Golden Rule" for Green Belt or "Grey Belt" release is defined by a mandatory **percentage point uplift**, not a percentage-of-percentage calculation.

Element	Requirement / Formula	Statutory Total
Local Plan Base (LDC Policy H2)	35%	35.0%
Statutory Golden Rule Uplift	+15 Percentage Points	+15.0%
Mandatory Compliance Target	(Base + 15 Percentage Points)	50.0%
Applicant's Offer	(Base + 15% of Base)	43.0%

Element	Requirement / Formula	Statutory Total
Total Shortfall	Non-Compliance Gap	-7.0% (Deficit)

### 3.0 Policy Impact: The "Grey Belt" Disqualification

The **NPPF (2026)** is clear: if the Golden Rules are not met, the land cannot be considered for Green Belt release under the "Grey Belt" criteria.

- By offering only **43%**, Bloor Homes is failing the "affordability tax" required for the privilege of building on protected green space.
- This 7% shortfall represents a loss of approximately **17–18 affordable units** to the Burntwood community.

Yours sincerely,

**Burntwood Action Group**