



Part B – Please use a separate sheet for each representation

Name or Organisation: Bloor Homes Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="DS1 (Green Belt)"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Alterations to the Green Belt boundary

The Plan is not consistent with national policy in its approach to amendments to the Green Belt boundary in so far as it has not taken account of the need to promote sustainable patterns of development. This has resulted in the proposed allocation of sites that make a greater contribution to the purposes and essential characteristics of Green Belt than alternative locations.

For instance, in Wombourne, the allocation of Sites 463 and 284 would result in greater harm (both to the Green Belt and other objectives) than omission Site 283. Whilst the Green Belt Study scored the parcels broadly similar the Plan itself has not taken fully account of other criteria and policies promoted in the Framework to achieve a sustainable pattern of development. This includes the greater harm in relation to landscape and Local Highway Authority concerns in relation to access to Sites 463 and 284. This is expanded upon elsewhere in other representations submitted.

Safeguarded Land

The Plan is not consistent with national policy or positively prepared as it has not identified safeguarded land to be removed from the Green Belt to meet longer term development needs.

The Plan area has substantial Green Belt constraint and will continue to generate development needs in the long term (either its own or neighbouring areas). Therefore safeguard land should be identified to meet future development needs beyond the plan period.

This will continue the long established principle of identifying safeguarded land in development plans in South Staffordshire and ensure consistency with the Framework. It is noted that the current development plan identified at least 10 years' worth of safeguarded land, it is questioned why this new Plan has not taken this approach.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to achieve a sustainable pattern of development for Wombourne, Site 283, Land North of Bridgnorth Road should be allocated in the Plan.

This site has a capacity of approximately 118 dwellings, which could make a meaningful contribution towards meeting the housing requirement. The concept masterplan sets out how this could be delivered with sufficient open space, perimeter blocks, street tree planting, and a landscape buffer, based on a density of approximately 37 per hectare.

Accompanying these representations is a Green Belt Position Paper, prepared by Zebra Landscape Architects (ZLA), which has considered the Council's Green Belt Study and conclusions reached on Site 283.

ZLA finds that the site affords less of a contribution to the Green Belt than the wider land parcel of S72 (appraised in Part One of the LPA's Green Belt Study, 2019), and also S72sA1 and S72sA2 within Part Two of its Study.

Site 283 is sandwiched between extensive woodland blocks and spinney features. These features define the southern periphery of Wombourne including the Smestow Valley Railway Walk, Himley Plantation and the broadleaf spinney adjoining the site. This woodland is mature and long-established, limiting the intervisibility with the open countryside outside of the village.

The site is enclosed further by the route of the Bridgnorth Road (B4176) as well as the extensive residential built form and the Stych Lane cemetery. However, these features are not enclosed by a similar woodland block or spinney similar to that typically experienced around the southern edge of the village. The existing edge of the Himley Meadows scheme is experienced as quite raw (lacking robustness) and the cemetery enclosed by a curtilage of tree components rather than a robust broadleaf woodland feature.

The release of this land from the Green Belt for development would have an effect on spatial openness, but it is unlikely to have a harmful effect on the visual openness of the Green Belt. Indeed, whilst the change to the site's fabric and character would be discernible locally, it is considered that the eventual



development will have no, or no additional, effect on the openness of the Green Belt, either visual or spatially. The logical development of the site would be contained by durable and defensible features eliminating perceived or physical coalescence with outlying settlements or ribbon development along existing vehicle routes.

The release of the site from the Green Belt would afford an opportunity for a consistent boundary treatment for Wombourne, and better integrate the southern edge of the village into the landscape. This would not weaken the integrity of the adjacent Green Belt and would not compromise the openness of the wider Green Belt through development and urban features which might otherwise be readily discernible and incongruous.

On the basis of ZLA's assessment, therefore, the Site is of lesser Green Belt harm, which is a criterion for allocations within the village. In addition, ZLA's note sets out how compensatory benefits to the remaining Green Belt can be secured through the creation of additional woodland planting and hedgerows, within the eastern area of the Site that is proposed to remain within the Green Belt (see enclosed Masterplan). Additionally, the landscape of the site would enable ecological betterment and biodiversity net gain through habitat creation, formal and informal landscaping.

Also accompanying these representations is a Green Belt Addendum Paper, also prepared by ZLA, which has considered the Council's Green Belt Study and conclusions reached on Sites 463 and 284 which are proposed to be allocated in Wombourne.

ZLA conclude that both Sites 463 and 284 perform a Moderate to Strong role in terms of Green Belt function, and that release of these land parcels for development would generally lead to above Moderate harm and in some areas Significant harm to the function of the Green Belt through an urbanising effect, with only a Low to Moderate degrees of boundary resilience.

The Council should also identify safeguarded land to meet longer term development needs in all sustainable locations.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To raise matter of soundness central to the strategic policies of the Plan.

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX