



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	DS5 (Spatial Strategy)	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

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

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.

Settlement Hierarchy

The Plan is not sound as it inconsistent with national policy and not justified based on the supporting evidence.

The proposed settlement hierarchy has altered from that established in the Core Strategy, such that there are now three Tier 1 settlements where the largest share of housing growth is directed (40.5%) and 5 Tier 2 settlements where 16.5% of growth is apportioned (with the remainder going to smaller villages and areas adjacent to neighbouring towns and cities).

One of the key determinants to the settlement hierarchy is the Rural Services and Facilities Audit (2021) (RSFA), which has taken account of a range factors including services and facilities within a settlement and the relative access to main centres and employment opportunities outside of a settlement by public transport.

For access to employment opportunities a Hansen mapping exercise has been undertaken, which considers the proximity of a settlement to jobs by bus and rail. Whilst this can be a useful exercise it has its limitations and will only provide a current snapshot since it is based on existing public transport provision. It does not take account of the opportunities that development can bring to provide additional or improved public transport through patronage or specific modal shift strategies. Local Plans provide the opportunity to shape growth and improve



existing areas for all. Thus the weighting for access to employment in determining the settlement hierarchy is too great and is skewed.

Furthermore, the RFSAs have placed too much weight on rail provision in establishing the settlement hierarchy. Whilst there is no railway at Wombourne, it does have regular and frequent bus services to Wolverhampton, Stourbridge and Merry Hill amongst other destinations. Bus service networks are able to serve a much wider catchment than rail for day to day needs, and the ability for local authorities to directly improve services is much greater than for rail.

In addition, the assessment does not recognise the availability of employment opportunities within an area that may be accessible by sustainable means other than by public transport. For instance, in Wombourne there is currently 44.3ha of employment land, such as Heathmill Road and Smestow Bridge Industrial Estates (Table 9, page 83) which provide employment opportunities, as well as other employment generating uses in the settlement centre and around the settlement.

Neither does the RSFA make any reference to the changing patterns of working, whereby more people are choosing to work from home either part or all of the time, which is likely to be a permanent feature of employment patterns going forward. In this context, the availability of services and facilities in close proximity to meet day to day needs becomes more important, such as doctors, shops and schools to provide for a greater level of self-containment.

Wombourne's housing needs

In determining the settlement hierarchy, consideration has not been given to the relative size of the settlement and in turn the housing needs that it is likely to generate on its own. The Plan is therefore unsound as it is not positively prepared.

For instance, Wombourne, which has a population that is greater than some of the Tier 1 settlements, is providing 8% of the total proportion of housing delivery. However, its population equates to 11.5% of the District population, which totals 112,369 people (see the appended Technical Note on the Housing Needs of Wombourne in support of these representations). This would suggest Wombourne should be delivering broadly 11.5% of the District wide housing need simply to meet its own housing needs.

Based upon the identified Housing Target for the Plan, totalling 9,089 dwellings, this would equate to a requirement within Wombourne of 1,045 new homes over the Plan period. This exceeds the identified housing supply for Wombourne within the Plan (of 825 units), by at least 220 units over the Plan period.

Furthermore, an analysis of commuting patterns from South Staffordshire residents to Birmingham as well as the remainder of the Greater Birmingham Housing Market Area, demonstrates that residents of Wombourne comprise 11% of district-wide commuters to Birmingham, and 12% of district-wide commuters to the whole housing market area. This is a similar percentage to that of Wombourne's population relative to the District (as discussed above), and would suggest that Wombourne should meet c.11% of the District's agreed unmet housing need (from the Greater Birmingham Housing Market). In addition, Wombourne has a higher proportion of 0-16 year olds relative to other areas, whose housing and social needs should be planned for.

The consequences of not providing for a sufficient level of housing within Wombourne are likely to result in an increased pressure on the local housing



market, increasing local house prices and worsening the already high affordability ratio. Whilst this of course impacts on those looking to move to Wombourne to live, it also impacts on those currently living within Wombourne, who may be looking to purchase their first home, downsize or upsize.

Southern Sub Area

In respect of Wombourne, it is located within the Southern Sub Area as prescribed by the Council's SHMA, within which a need of 2,391 dwellings is identified over the Plan period. By way of comparison, an analysis of the planned housing supply as identified in the Plan totals only 1,831 dwellings within the Southern Sub Area. At present, there therefore exists an unmet need within the Southern sub area of approximately +560 dwellings over the Plan period. Wombourne is one of only two Tier 2 settlements in the sub area (with Kinver being the other) but has the greatest opportunity to deliver additional growth. In addition, its housing affordability is high ranging from 7.26 to 8.9, which is higher than the District average.

Market Attractiveness

The National Planning Practice Guidance (NPPG) requires consideration be given to the appropriateness and likely market attractiveness for the type of development proposed (NPPG reference: Paragraph: 018 Reference ID: 3-018-20190722). It isn't clear from the Strategy whether an assessment of market attractiveness is part of the evidence base for the purposes of allocating sites.

In terms of market attractiveness, Bloor Homes would make the point that in respect of land at Wombourne (north of Bridgnorth Road) there has been very strong demand for its properties recently completed at Himley Meadows, which is evident in how quickly it has been delivered. The level of demand is extremely high and comparable to other Bloor Homes developments in high value areas, such as Blythe Valley in Solihull. Furthermore, the Council's Viability Study 2021, Appendix 3 identifies the market values in Locality 5 to be amongst the highest in the Plan area. This is evidence of the attractiveness of this area as a location for further housing to meet existing and future housing need.

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.

The spatial strategy should be revised to take account of:

- existing employment opportunities within a settlement that are within walking and cycling distances;
- the opportunities development and strategies can bring to enhance public transport;
- systemic changes to the way people are working, including greater home working;
- delivering a proportion of housing needs to address a shortfall within the southern sub area;



- delivering a more proportionate amount of housing at Wombourne relative to its size; and,
- market attractiveness of settlements

On this basis, it is readily apparent that Wombourne should be considered a Tier 1 settlement, commensurate with the Plan’s infrastructure led strategy, and further growth directed towards it accordingly.

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