



Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text" value="X"/>	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" value="X"/>	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.

Policy DS5: The Spatial Strategy to 2041

Settlement Hierarchy

1. The Plan is not sound as it inconsistent with national policy and not justified based on the supporting evidence.
2. 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.
3. 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.

4. Furthermore, the RFSFA has 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.
5. 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, which provide employment opportunities, as well as other employment generating uses in the settlement centre and around the settlement.
6. 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

7. 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.
8. For instance, Wombourne, which has a population that is greater than some of the Tier 1 settlements, but is providing only a small amount of new housing to meet its own housing needs.
9. 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 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.

10. 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

11. In respect of Wombourne, it is located within the Southern Sub Area as prescribed by the Council's SHMA, within which a need of 1,291 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 410 dwellings within the Southern Sub Area. At present, there therefore exists an unmet need within the Southern sub area of approximately 881 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

12. 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.
13. 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.

Approach to Green Belt

14. Part of the rationale for the Council's Spatial Strategy approach relies on the most recent revisions to the NPPF. Yet, in essence the approach taken in the NPPF remains unchanged, i.e. that there is no *requirement* to alter Green Belt boundaries but if it is proposed it must be fully justified. We consider that the substantial unmet needs arising from the GBBCHMA represent cogent exceptional circumstances for Green Belt boundary amendments.

15. A 'policy off' approach to housing land availability assessments for sites within the Green Belt should be undertaken, to ensure a holistic approach to development options that considers a range of factors. This would align with commentary in the South Staffordshire Green Belt Study (July 2019) at Paragraph 7.10 which states:

"Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in very high harm to the Green Belt. In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation".

(Continue on a separate sheet /expand box if necessary)

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 settlement hierarchy should be revised to differentiate Wombourne from other Tier 2 settlements. Wombourne should play a greater role in housing provision in order to meet its own local housing needs, and there are clear exceptional circumstances to further amend Green Belt boundaries.



(Continue on a separate sheet /expand box if necessary)

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:

In order for the Inspector(s) to be able to appropriately consider the evidence presented by all parties before taking a view.

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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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