

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 SA3	Policies	Мар	
4. Do you consider the Local Plan is :				
(1) Legally compliant	Yes	X	No	
(2) Sound	Yes		No	Х
(3) Complies with the Duty to co-operate	Yes	X	No	

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 SA3: Housing Allocations

- 1. Draft Policy SA3 sets out the non-strategic housing allocations proposed in the SSLPR. An objection to draft Policy SA3 is made due the omission of Land north of Bridgnorth Road, Wombourne as an allocation for housing.
- 2. As drafted, we consider Policy SA3 is not justified and therefore cannot be considered sound in line with the NPPF¹.
- 3. Site 283 (Land North of Bridgnorth Road) would require no additional highway works to Bridgnorth Road since it benefits from a newly established access at Himley Meadows and based on the Council's own assessment is a less sensitive landscape. It is evident that Site 283 performs better than other proposed allocations around Wombourne, contrary to the Site Selection Proformas'

¹ Paragraph 35 of the NPPF



conclusion. It is on this basis that the Plan has erred and Site 283 should be allocated.

- 4. In summary, Site 283 is suitable, available and deliverable. Furthermore, there are some notable advantages from the allocation of this site as follows:
- 5. The site is an area of low landscape sensitivity relative to other areas of the village and relates well to the existing village. The site affords less of a contribution to the Green Belt than the wider land parcel of S72. A strong landscape framework in the proposed masterplan includes dense tree planting to ensure a permanent defensible boundary, to the east and north, for the remaining Green Belt and prevent the coalescence, or perception of coalescence, with neighbouring Himley.
- 6. The landscape framework will create a distinct sense of place, provide opportunities for biodiversity net gain, and enhance existing neighbouring woodland.
- 7. As the accompanying Landscape Position Paper notes, Site 283 is spatially and visually well related to the village of Wombourne and its settlement edge. The site is not in a prominent location and the strongly wooded character of the surrounding area limits its intervisibility to the east, south and south west. The site has low to minor landscape sensitivity, particularly given the substantive degradation of landscape features within the site. And there is an opportunity to provide substantial landscape enhancements through green corridors, buffering and the reinforcement of existing hedgerows.
- 8. The Site is in an area that is attractive to the market and can help contribute to a more appropriate quantum of market and affordable housing for Wombourne to meet local needs within the village and wider area.
- 9. Primary access could be taken direct from the neighbouring Himley Meadows development (or Bridgnorth Road if required, or a combination of both) and no junction capacity issues are envisaged. The Site is also approximately 400m from the nearest existing bus stops on Common Road.
- 10. Development would ensure appropriate contributions towards existing facilities and infrastructure including health, education, sport, recreation and public transport.



- 11. The site adjoins, and can seamlessly integrate with, an existing sustainable settlement. It is well connected and is within walking distance of the village services and facilities. It also offers a substantial amount of green infrastructure and landscape enhancements.
- 12. In relation to lead-in times, the timing of any planning application would be subject to the progress of the Local Plan given its Green Belt status, but Bloor Homes have previously demonstrated at Himley Meadows that delivery could follow quickly after adoption of the Plan.

(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.

Site 283 (Land North of Bridgnorth Road, Wombourne) should be allocated for residential development.

(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 <u>localplans@sstaffs.gov.uk</u> or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX