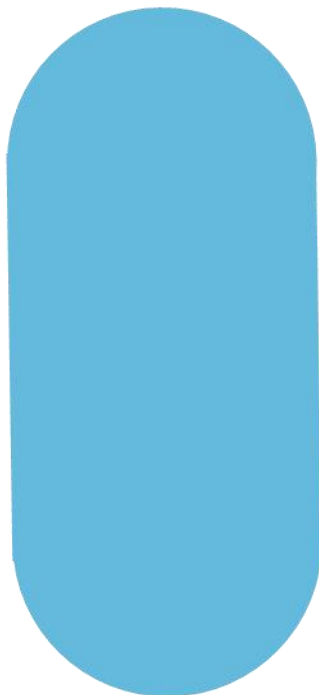


**REPRESENTATIONS IN RESPECT OF THE SOUTH
STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW –
PREFERRED OPTIONS CONSULTATION NOVEMBER 2021**

On Behalf of Bloor Homes Limited

Land North of Bridgnorth Road, Wombourne (Site Reference 283)





CONTENTS

	Page No
1. Introduction	3
2. Local Plan Representations	5
3. Land north of Bridgnorth Road, Wombourne	12

Appendices

Appendix 1 – Site Location Plan

Appendix 2 – Wombourne Housing Need Technical Note

Appendix 3 – Constraints and Opportunities Plan

Appendix 4 – Concept Masterplan

Appendix 5 – Landscape Position Paper

Appendix 6 – Green Belt Position Paper



1. INTRODUCTION

- 1.1 These representations are made in respect of the South Staffordshire Council Local Plan Review Preferred Options consultation on behalf of Bloor Homes Limited in relation to land it is promoting for residential development at Land North of Bridgnorth Road, Wombourne (Site Reference 283).
- 1.2 Bloor Homes Limited, has control via agreement over the land, and the extent of the land under control is identified at **Appendix 1** of these representations.
- 1.3 These representations consider the Preferred Options consultation document (Section 2), and promote Land North of Bridgnorth Road, Wombourne as a housing allocation in the Local Plan Review (Section 3).
- 1.4 Representations were submitted to the previous Spatial Housing Strategy & Infrastructure Delivery consultation in December 2019, and many of the points raised are still applicable in respect of decisions the Local Plan should take and amendments that should be made within the Publication version of the Plan.
- 1.5 In summary, it is considered that the Spatial Strategy for the Plan should be reviewed, to elevate the settlement status of Wombourne, as sustainable location, which provides a proportionate amount of homes relative to its size. Local Housing Needs should be kept under review until the point of submission of the Plan, and the housing requirement should be increased to further address unmet needs given the availability of other suitable and deliverable sites not currently allocated.
- 1.6 The settlement hierarchy should be reviewed in light of suggested changes to how the sustainability of places are assessed, in particular in relation to employment access, how Plans can shape growth, and to address local housing needs in a proportionate manner. On this basis it is considered Wombourne should be a Tier 1 settlement. Wombourne is a sustainable



settlement, which is currently under providing homes to meet its own needs. A relatively small uplift in the units the village is required to deliver would help address this. Bloor Homes control a suitable site for approximately 118 homes that could help address these issues.

- 1.7 Concerns are raised that the Preferred Options does not allocate land with the least environmental value in Wombourne, contrary to the Framework. It is recommended that Site 283 is included within the next iteration of the Plan given the limited harm in Green Belt and landscape terms. It could form a logical extension to the village, which is within walking distance of services and facilities. The Site can provide strong defensible boundaries, landscape enhancement, and wider community benefits.



2. Local Plan Representations

DS3 Spatial Strategy

Plan Period

- 2.1 The start date for the Local Plan should be based on the anticipated timescales for Publication of the Plan, this would suggest the start year should be 2022, or 2023 if the current timetable slips. In so doing, the housing requirement (calculated using the standard method) would take account of the latest household growth projections and housing affordability data, which takes account of past delivery. In addition, Local Housing Need should be kept under review and altered where necessary through the plan making process until the point of submission for examination (NPPG ID 2a-008-20190220).

Local Housing Need

- 2.2 Accompanying these representation is a technical note on housing needs for South Staffordshire prepared by Marrons Socio-Economic team (Appendix 2). Amongst other matters, it identifies that there is a disconnect between the Plan's identification of a local housing need (LHN) of 4,881 dwellings over the Plan period 2018 -2038 and the Council's SHMA, May 2021, which notes LHN of 5,068 additional dwellings over the plan period. As noted above, local housing need must be kept under review to the point of submission of the Plan.
- 2.3 The Standard Method is a minimum and before considering what unmet need SSC could accommodate, it should consider whether there are any reasons why it should go above the Standard Method to meet its own housing needs (NPPG 2a-010-20201216). Noting the Government's objective of significantly boosting housing land supply, these include demographic, affordability and economic factors, such as West Midlands Interchange. The Council have not undertaken this exercise and should do so prior to the submission of the Plan, making any necessary consequential uplifts to the LHN and quantum of new housing allocations



accordingly.

Unmet Needs

- 2.4 In order to address unmet needs from the wider GBBCHMA, the Plan proposes provide an additional 4,000 above its LHN as its contribution. The Plan notes that neighbouring authorities have not explicitly objected to the level of proposed contribution, however the absence of objections is not the test to demonstrate a sound plan has been prepared. There is no current evidence of how the remaining HMA shortfall will be addressed. And given South Staffordshire's close proximity to Black Country authorities, which have recently declared a shortfall of 28,239 homes that should be exported to neighbouring LPA's through the Duty to Co-Operate, the Plan should provide a greater contribution towards unmet needs.
- 2.5 Indeed, it is noted that the iteration of the Sustainability Appraisal (SA) accompanying the Preferred Options has not tested the effects of accommodating different levels of unmet needs. Whilst these were tested through the SA in 2018 for the Issues and Options consultation, it is prudent to do so again in light of the depth of evidence prepared for the Plan, and that strategic matters are evolving elsewhere.
- 2.6 For instance, it is apparent from the Council's evidence that there are additional available and suitable sites adjacent to settlements, such as Wombourne, which would have a limited impact on landscape, Green Belt and infrastructure amongst other factors. There is therefore scope to increase the housing requirement. The Council would require robust evidence to demonstrate that unmet housing needs from neighboring areas could not be met within its area (NPPG reference: Paragraph: 012 Reference ID: 61-012-20190315).
- 2.7 In the context of a Plan area that has substantial Green Belt constraint, will continue to generate development needs in the long term (either its own or neighbouring areas), consideration should also be given to identifying safeguarded land 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.

Settlement Hierarchy

- 2.8 The proposed settlement hierarchy has altered from that established in the Core Strategy, such that there are now three Tier 1 villages where the largest share of housing growth is directed (39%) and 5 Tier 2 villages where 17% of growth is apportioned. The remainder going to smaller villages and areas adjacent to neighbouring towns and cities.
- 2.9 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.

Employment Access

- 2.10 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.
- 2.11 Furthermore, the RSFA 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 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.

2.12 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 46.3ha of employment land, such as Heathmill Road and Smestow Bridge Industrial Estates (Table 9, Preferred Options) which provide employment opportunities, as well as other employment generating uses in the village centre and around the village.

2.13 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

2.14 In determining the settlement hierarchy, consideration should also be given to the relative size of the settlement and in turn the housing needs that it is likely to generate on its own. 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 Appendix 2 for the technical note on the needs of Wombourne). This would suggest Wombourne should be delivering broadly 11.5% of the District wide housing need simply to meet its own housing needs.

2.15 Based upon the identified need within the Council's SHMA (plus unmet need), totaling 9,068 dwellings, this would equate to a requirement within Wombourne of 1,043 new homes over the Plan period. Alternatively, based upon the Draft Local Plan housing requirement of 8,881, this would



equate to a requirement within Wombourne of 1,021 new homes. Both figures exceed the identified housing supply for Wombourne within the Preferred Options (of 808 units), by at least 213 units over the Plan period.

2.16 Furthermore, an analysis of commuting patterns from South Staffordshire residents to Birmingham as well as the remainder of the Greater Birmingham Housing Market Area, demonstrate 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 area, whose housing and social needs should be planned for.

2.17 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, or upsize.

Southern Sub Area

2.18 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 Draft Local 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

- 2.19 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.
- 2.20 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.
- 2.21 Overall, 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
- 2.22 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.



SA5 Housing Allocations

- 2.23 The proposed allocation of site 463 & 284 (Land off Billy Buns Lane and Gilbert Lane) in Wombourne, is not sound. It is not an appropriate strategy in light of alternative options for housing delivery within village and since the Framework requires plans to allocate land with the least environmental or amenity value (para. 175). In particular the Council's evidence identifies it has a greater landscape sensitivity compared to Site 283 and would require significant highway works.
- 2.24 By comparison Site 283 would require limited additional highway works to Bridgnorth Road since it benefits from a newly established access at Hilmey 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' conclusion. Further analysis of Site 283 and why it should be allocated is set out in the section below.



3. LAND NORTH OF BRIDGNORTH ROAD, WOMBOURNE

3.1 Land north of Bridgnorth Road (Site 283) has been assessed through the Local Plan evidence base thus far, including in the housing topic paper, landscape and green belt evidence. The following comments are made to assist in the refinement of housing allocations for the proposed submission version of the Local Plan, and in part a response to the Council's evidence base to date. The comments should be read in association with the submitted Constraints & Opportunities Plan, Concept Masterplan, Landscape and Green Belt Position Papers attached as Appendices 3, 4, 5 and 6 respectively.

3.2 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.

Sustainability Appraisal

3.3 For Site 283, the key determinant in the Sustainability Appraisal and Site Assessment is the potential for major negative impacts in relation to landscape criteria due to Green Belt harm. Firstly, following the evidence trail this conclusion is reached solely based on the purported moderate-high levels of harm to the purposes of the Green Belt in the eastern extent of the Site. This is different to what is concluded for the western area of the Site, such that it is moderate harm (which is contended below) and different to the conclusion overall. Secondly, it is unclear why the Green Belt assessment has been used as a criteria for the sustainability appraisal rather than the Landscape Sensitivity assessment only, which would conclude differently. Section 2 of the accompanying Landscape Position Paper (Appendix 5) considers this element of the SA to be flawed.



Green Belt

- 3.4 Accompanying these representations is a Green Belt Position Paper (Appendix 6), prepared by Zebra Landscape Architects (ZLA), which has considered the Council's Green Belt Assessment and conclusions reached on Site 283.
- 3.5 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 Review, 2019), and also S72sA1 and S72sA2 within Part Two of their Review.
- 3.6 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.
- 3.7 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 broadleaf woodland feature, which is less robust
- 3.8 The release of this land from the Green Belt for a proposed 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.

3.9 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.

3.10 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, the 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 bio-diversity net gain through habitat creation, formal and informal landscaping.

Landscape

3.11 These representations and the enclosed masterplan have also been informed by a Landscape Position Note, prepared by ZLA. The Note sets out that 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.

Suitability, Delivery & Benefits

3.12 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.

- 3.13 It is also noted the site is within a minerals safeguarding area although this is not a constraint to the site being developed, given that it is too small an area to viably work and would not undermine wider mineral resource needs.
- 3.14 In summary, the site is suitable, available and deliverable. Furthermore, there are some notable advantages from the allocation of this site as follows:
- 3.15 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.
- 3.16 The landscape framework will create a distinct sense of place, provide opportunities for biodiversity net gain, and enhance existing neighbouring woodland.
- 3.17 The Site is in an area that is attractive to the market and can help contribute to a more appropriate quantum of housing for Wombourne to meet local needs within the village and wider area.
- 3.18 Primary access could be taken direct from Bridgnorth Road or the neighbouring Himley Meadows development 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.
- 3.19 Development would ensure appropriate contributions towards existing facilities and infrastructure including health, education, sport, recreation and public transport.
- 3.20 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.

3.21 In accordance with the recommendations above regarding the appropriate spatial strategy it is considered that the Land North of Bridgnorth Road should be included within the proposed allocations in the Publication Plan.

3.22 We would be very happy to meet to discuss these representations further and the benefits the Site could deliver.