

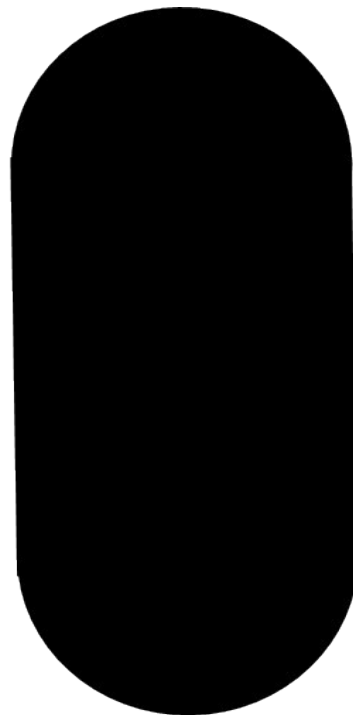
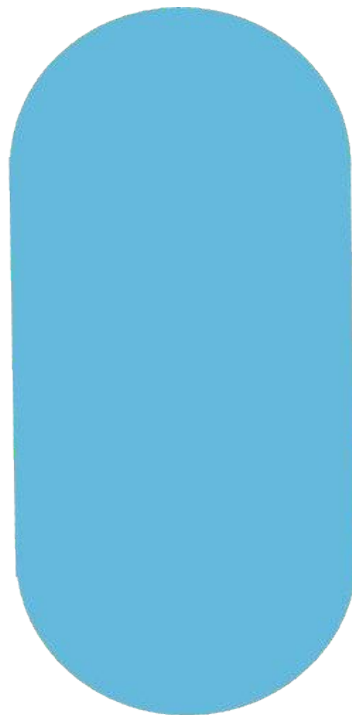


Statement in Respect of the South Staffordshire Local Plan Examination

**Matter 1 – Procedural and Legal
Requirements**

AGT24-027-01

On Behalf of Bloor Homes Limited





1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Marrons on behalf of Bloor Homes Limited with respect to Matter 1 – Procedural and Legal Requirements.
- 1.2 Marrons have been instructed to respond to the South Staffordshire Local Plan Examination Matters, Issues and Questions by Bloor Homes Limited, in respect of their land interest off Bridgnorth Road, Wombourne (SHELAA site reference 283).
- 1.3 This Hearing Statement is supported by representations submitted by Bloor Homes Limited to the Regulation 19 Local Plan consultation in May 2024.

2. MATTER 1 – Procedural and Legal Requirements

Issue 1: Whether the Council has complied with the relevant procedural and legal requirements.

Sustainability Appraisal

9f. Is consideration of reasonable alternatives and reasoning for rejecting alternatives clearly justified?

- 2.1 The Council's 'South Staffordshire Green Belt Study Stage 1 and 2 Report' (2019) should not be used as a criterion for the Sustainability Appraisal in its assessment of Landscape Sensitivity.
- 2.2 The Sustainability Appraisal's assessment of Landscape Sensitivity would yield a different conclusion in relation to the assessment of Sites if the Green Belt Study had not been used in the assessment criteria. It would be more appropriate for the Sustainability Appraisal to rely solely on the Landscape Sensitivity Assessment in its assessment of Landscape Sensitivity. We disagree that the Green Belt Assessment is "relevant criteria to consider within the wider topic of landscape as set out in SA Objective 4" ([CD9, pg 28](#)). The SA Objective 4 Landscape and



Townscape does not explicitly reference Green Belt in either the decision making criteria or as indicators ([EB2a at Appendix B, pg B1](#)).

- 2.3 Alternative sites have been rejected on the basis that they perform poorly against the Landscape Sensitivity criteria of the Sustainability Appraisal, despite not necessarily having harmful visual effects. Therefore, the reasoning for rejecting alternative sites has not been clearly justified. Section 2 of the Landscape Position Paper submitted previously as part of the Regulation 19 consultation provides further analysis on this.

10. Have the legal requirements for Sustainability Appraisal/ Strategic Environmental Assessment been met as part of the plan preparation process?

- 2.4 The Environmental Assessment of Plans and Programmes Regulations 2004 require a strategic environmental assessment (SEA) of any plan or programme that sets the framework for future development consent of projects and is likely to have a significant effect on the environment.
- 2.5 Indeed, Schedule 1 of the Regulations sets out the criteria for determining the likely significance of effects on the environment, of which, Section 1(d) requires plans and programmes to have particular regard to environmental problems relevant to the plan or programme. It is not considered that the Green Belt Study is relevant to the environmental considerations of Landscape Sensitivity in terms of effects on visual amenity and landscape character.
- 2.6 It is on that basis that the methodology applied in the production of the Sustainability Appraisal is fundamentally flawed. It is not compliant with Section 19 of the Planning and Compulsory Purchase Act 2004 which requires that the authority preparing a plan must do so “with the objective of contributing to the achievement of sustainable development” as the Sustainability Appraisal has not adequately assessed all available sites.

Word Count: 554



 **Marrons**

