



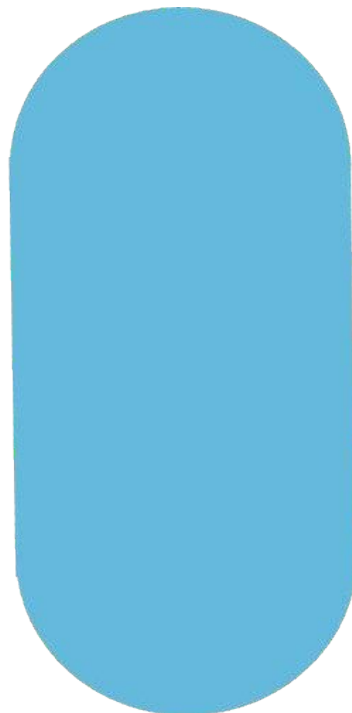
Statement in Respect of the South Staffordshire Local Plan Examination

Matter 6 – Green Belt

AGT24-027-01

On Behalf of Bloor Homes Limited

April 2025





1. INTRODUCTION

1.1 This Hearing Statement has been prepared by Marrons on behalf of Bloor Homes Limited with respect to Matter 6 – Green Belt.

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 6 – Green Belt

Issue 1: Whether the Plan’s approach to the Green Belt is positively prepared, justified, effective and consistent with national policy.

2d: The need to promote sustainable patterns of development.

2.1 When reviewing Green Belt boundaries the need to promote sustainable patterns of development should be taken into account, and whether consequences of directing development to non Green Belt locations would be unsustainable versus highly sustainable Green Belt locations. The Presumption also stresses the importance for plans to a promote sustainable pattern of development, that seeks to meet development needs and mitigate climate change amongst other things.

2.2 In this instance, the Plan has not maximised the opportunity to promote sustainable patterns of development. Indeed, one of the key determinants of the Plan’s settlement hierarchy, the Rural Services and Facilities Audit (2021) (RSFA), is flawed in placing too much weight on rail services at the expense of other forms of public transport. It also does not take account of the opportunities that development can bring to provide additional or improved public transport. This has resulted in insufficient development being directed to sustainable locations such as Wombourne.

- 2.3 Therefore, the Plan has not adequately assessed all opportunities for sustainable patterns of development. As such it is contended that, for the Local Plan to be found sound at Examination, the determinants used to establish the Plan's settlement hierarchy should be justified by the use of all available evidence.

3. How has the Council assessed the suitability of land parcels and their contribution towards the purposes of including land in the Green Belt?

- 2.4 As noted in our Regulation 19 representations, the Council's 'South Staffordshire Green Belt Study Stage 1 and 2 Report' (2019) is a coarse grain analysis of land parcels surrounding settlements. A finer grain analysis of promoted development parcels should have been undertaken. For instance, evidence submitted with the regulation 19 representations for Site 283 confirms it affords less of a contribution to the Green Belt than the wider land parcel of S72, and also of sub parcels S72sA1 and S72sA2. Thus, the Site would comply with the Council's Local Plan criteria that Sites of lesser green Belt Harm should be allocated.

6: Are there exceptional circumstances to justify the release of Green Belt land for development in Tier 2, 3 or 4 settlements?

- 2.5 Yes, it is considered that the substantial unmet needs arising from the GBBCHMA represent cogent exceptional circumstances for Green Belt boundary amendments.
- 2.6 The Council's justification in approach to contributions to be made to the GBBCHMA appears to be wholly influenced by the 'capacity-led' approach to the Spatial Strategy. This approach focuses growth to non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport. Due consideration is not given to the level of unmet needs and how they could be accommodated holistically in South Staffordshire. Given that the GBBCHMA Statement of Common Ground has also not yet been signed, there is not voluntary cross-border agreement on the level of unmet need that South

Staffordshire are proposing to make provision for. As such, the Council are required to help in ensuring overspill from GBBCHMA is met in full (NPPF 62).

- 2.7 Given the Plan makes a far too limited contribution to the significant and increasing unmet needs of the GBBCHMA, it is not considered to be positively prepared and thus sound. 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. Indeed, Land off Bridgnorth Road is designated as Green Belt but is located in an inherently sustainable location, within walking distance of Wombourne village centre, with onwards public transport connections to Wolverhampton.
- 2.8 Wombourne has been identified as a Tier 2 settlement and is located within the Southern Sub Area prescribed by the Council's SHMA ([EB26, P.35](#)), which identified a need of 1,291 dwellings over the Plan period for all tenures. By way of comparison, an analysis of the planned housing supply in the Plan identified only 410 dwellings within the Southern Sub Area. Wombourne is one of only two Tier 2 settlements in the sub area and has the greatest opportunity to deliver additional growth.
- 2.9 Furthermore, in the initial letter sent by the Inspector involved in the examination of the Dudley Local Plan, concerns were raised over the fact that the Black Country Green Belt Study is now over five years old. As such, it is considered that the 'South Staffordshire Green Belt Study Stage 1 and 2 Report' (2019) may also be out-of-date, and therefore the Plan's strategy to only alter the extent of the Green Belt around Tier 1 settlements is not based on proportionate evidence. On this basis, for the Local Plan to be found sound at Examination, it should be positively prepared so that the unmet need from neighbouring areas are accommodated where it is practical to do so, which could include Green Belt release around Tier 2 settlements.

Question 10: Should the Local Plan identify safeguarded land?

- 2.10 The Council suggests that there are no exceptional circumstances for the alteration of Green Belt boundaries to accommodate safeguarded



land, as it must wait for an updated Strategic Growth Study across GBBCHMA, no neighbouring authorities have asked for land to be safeguarded, they haven't been required in other examinations and regular Plan reviews negate the need for safeguarding ([CD9, pg 67](#)). This is clearly a response to simply defer what is an inevitability; when the Plan is reviewed Green Belt boundaries will need to be amended to address future housing needs, let alone the significant uplift under the revised Standard Method, and irrespective of what needs may have to be accommodated from elsewhere.

- 2.11 The Plan should identify safeguarded land where it is necessary to do so. The Plan area has both substantial Green Belt constraint, with around 80% of the district designated as Green Belt, as well as a continued development need in the long term (either its own or neighbouring areas). Indeed, 20% of the district's countryside which is not designated as Green Belt is concentrated in the north of the district and therefore development needs in the south of the Plan area will generate a greater pressure on Green Belt land. Therefore, safeguarded land should be identified to meet future development needs beyond the plan period.
- 2.12 This will ensure a continuity in the approach applied in South Staffordshire, where there is a long-established principle of identifying safeguarded land in development plans. The Plan should identify safeguarded land to meet longer term development needs in all sustainable locations, as had been identified in the current development plan. As such it is contended that, for the Local Plan to be found sound at Examination, it should be positively prepared in accordance with Paragraph 148(c) of the NPPF.
- 2.13 On this basis, if Land off Bridgnorth Road is not allocated for development, it represents a suitable site to be released from the Green Belt and designated as an area of safeguarded land between the urban area and the Green Belt.

Word Count: 1,303



 **Marrons**

