



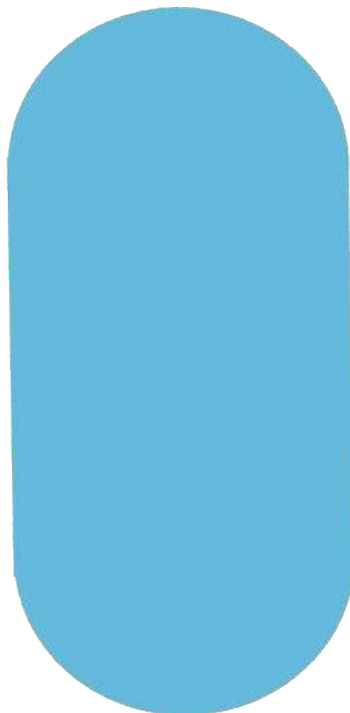
# **Statement in Respect of the South Staffordshire Local Plan Examination**

**Matter 7 – Site Allocations**

**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 7 – Site Allocations.
- 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 7 – Site Allocations

**Issue 1: Whether the preferred site allocations are positively prepared, justified, effective and consistent with national policy.**

**Question 1a: Is the spatial distribution of the allocations across the South Staffordshire area justified and is it consistent with the Spatial Strategy?**

- 2.1 The spatial distribution of the Plan does not take account of the relative size of settlements and the housing needs it generates. For instance, Wombourne is larger than some of the Tier 1 settlements but is providing only a small amount of new housing to meet its own housing needs. It is also a location with good public transport links, irrespective of rail provision. Wombourne also carries one of the District's three Large Village Centres, reflecting its wider retail, employment and facilities offer.
- 2.2 Analysis suggests that based on internal and cross boundary commuting patterns Wombourne should meet approximately 11% of the District's housing needs. Furthermore, the SHMA identified a need of 1,291 dwellings over the plan period for the southern sub area, yet only 410 units are planned. Wombourne represents the most appropriate location in the Southern Sub Area to address this shortfall.

**Question 1b: Has the identification and selection of the proposed site allocations been robustly evidenced and subject to robust, consistent and transparent methodologies, including in relation to the approach to existing committed sites?**

- 2.3 The Council have opted for a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport.
- 2.4 At a strategic level, the spatial strategy also seeks to direct growth towards Wombourne, in recognition of its status as the largest Tier 2 settlement in the District and the level of facilities and public transport links compared to other rural settlements.
- 2.5 However, as noted above and in submitted representations, insufficient allocations have been made in Wombourne relative to its scale and the Council's Green Belt. The approach to Site Selection as evidenced in the Sustainability Appraisal; Housing Site Selection and Rural Services and Facilities Audits is flawed. For instance, by conflating Green Belt analysis with landscape sensitivity, placing too much weight on rail served settlements and not taking sufficient account of employment opportunities within settlements.
- 2.6 Further, the purported capacity-led approach has therefore not considered all opportunities for sustainable development. For instance, Land off Bridgnorth Road adjoins, and can seamlessly integrate with Wombourne. It is well connected and is within walking distance of the village services, facilities and employment opportunities. The Site is in an area of low landscape sensitivity relative to other areas of the village and is spatially and visually well related to Wombourne and its settlement edge.

Word Count: 555



 **Marrons**

