



Representations

South Staffordshire Local Plan Review
Publication Plan (Regulation 19) Consultation

Bloor Homes Limited

May 2024





1. The following representations are made in response to the South Staffordshire Local Plan Review (SSLPR) Publication Plan (May 2024) on behalf of Bloor Homes Limited in respect of their land interest off Bridgnorth Road, Wombourne (SHELAA site reference 283).
2. Representations were made by Marrons on behalf of Bloor Homes Limited to the previous SSLPR Publication Plan consultation in December 2022. Where previous representations made are still relevant to the revised Publication Plan, they are repeated here.
3. These representations should be read alongside the completed Representation Forms and the following supporting documents:
 - a. Concept Masterplan – Land North of Bridgnorth Road, Wombourne
 - b. Landscape Position Paper
 - c. Green Belt Position Paper
 - d. Wombourne Housing Need Technical Note

Strategic Policies and Allocations

Policy DS1: Green Belt

Land North of Bridgnorth Road, Wombourne

4. In order to achieve a sustainable pattern of development for Wombourne, Site 283, Land North of Bridgnorth Road should be allocated in the Plan.
5. This site has a capacity of approximately 118 dwellings, which could make a meaningful contribution towards meeting the SSLPR 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.
6. Accompanying these representations is a Green Belt Position Paper, prepared by Zebra Landscape Architects (ZLA), which has considered the Council's Green Belt Study and conclusions reached on Site 283.



7. 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 Study, 2019), and also S72sA1 and S72sA2 within Part Two of its Study.
8. 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.
9. 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 robust broadleaf woodland feature.
10. The release of this land from the Green Belt for 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.
11. 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.



12. 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, 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 Concept Masterplan). Additionally, the landscape of the site would enable ecological betterment and biodiversity net gain through habitat creation, formal and informal landscaping.

Safeguarded Land

13. The Plan is not consistent with national policy or positively prepared as it has not identified safeguarded land to be removed from the Green Belt to meet longer term development needs.
14. The Plan area has substantial Green Belt constraint and will continue to generate development needs in the long term (either its own or neighbouring areas). Therefore safeguard land should be identified to meet future development needs beyond the plan period.
15. This will continue the long established principle of identifying safeguarded land in development plans in South Staffordshire and ensure consistency with the Framework. It is noted that the current development plan identified at least 10 years' worth of safeguarded land, it is questioned why this new Plan has not taken this approach.
16. The Plan should be amended to identify safeguarded land to meet longer term development needs in all sustainable locations.

Policy DS4: Development Needs

17. Draft Policy DS4 details the housing, employment and gypsy and traveller requirements to be delivered in the SSLPR Plan period from 2023 to 2041. An objection to draft Policy DS4 is made on the following grounds:



- The length of the Plan period;
- The contribution proposed to be made towards the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), recognising the need for additional unmet housing needs to be dealt with;
- The omission of a sufficient buffer in housing supply;
- The inclusion of a high level of commitments within the housing supply without applying a lapse rate to commitments not started; and,
- The incorporation of a significant windfall allowance within the housing supply without the provision of compelling evidence to justify its inclusion.

18. As drafted, Bloor Homes Limited consider Policy DS4 is not positively prepared, justified, effective nor consistent with national policy and therefore cannot be considered sound in line with the National Planning Policy Framework (NPPF, December 2023)¹.

Plan Period

19. Draft Policy DS4 seeks to plan for South Staffordshire's housing, employment and gypsy and traveller needs to 2041. However, an objection is made to the Plan period running until only 2041, and the related limited requirements set out in draft Policy DS4, with particular reference to housing.

20. The NPPF is clear that strategic policies should look ahead over a minimum of 15 years from adoption². In order for compliance with the NPPF to be achieved, the SSLPR would need to be adopted by 2026 at the latest. Whilst that may be achievable with a fair wind, it is considered that any delays to the Submission and subsequent Examination of the SSLPR could result in the Plan falling foul of the requirements of the NPPF.

21. Since the NPPF requirement for strategic policies to look ahead 15 years is a minimum expectation, and the potential for a prolonged Examination given matters

¹ Paragraph 35 of the NPPF

² Paragraph 22 of the NPPF



such as the Duty to Cooperate which are likely to require significant consideration, the Plan period should be extended until at least 2043.

22. An extension to the Plan period to 2043 would increase the Council's Local Housing Need derived from the Standard Method by an additional 454 dwellings, with the potential for additional contributions required towards the unmet needs of the GBBCHMA too, as explored below.

Unmet Needs of the Greater Birmingham and Black Country Housing Market Area

23. Draft Policy DS4 seeks to include 640 dwellings of unmet needs from the GBBCHMA into the SSLPR Housing Requirement, in recognition of the significant shortfall in supply in Birmingham and the Black Country and the need for neighbouring authorities to accommodate additional growth in Local Plans in such circumstances, in order to be considered positively prepared and thus sound³.
24. It is noted that the proposed 640 dwellings contribution to unmet needs of the GBBCHMA is a significant reduction from the 4,000 dwellings contribution proposed in the 2022 version of the SSLPR Publication Plan.
25. Indeed, 4,000 dwellings contribution being made by South Staffordshire to unmet needs of the GBBCHMA was recognised in the now disbanded Black Country Plan Review. The Issues and Options version of the Black Country Plan Review (July 2021) identified a shortfall in housing supply totalling some 28,239 dwellings for the period to 2039. A maximum of 8,000 dwellings in contributions was proposed to be made towards this substantial shortfall by neighbouring authorities, including up to 4,000 from South Staffordshire. Thus, a significant shortfall in housing supply in the Black Country was evident even on the basis on the proposed 4,000 dwellings contribution being made by South Staffordshire, and remains the case. It is clear that this will require further consideration as each of the four local planning authorities develop their individual Local Plans.
26. This is particularly noteworthy for Wolverhampton, which South Staffordshire directly borders and has a strong economic and functional relationship with, given it is one of

³ Paragraph 35 a) of the NPPF



the largest 20 urban areas and thus is subject to the 35% uplift in Local Housing Need derived from the Standard Method as set out in National Planning Practice Guidance ('National Guidance')⁴. Reviewing the identified supply for each Local Planning Authority set out in the Black Country Plan Review Issues and Options document indicates that Wolverhampton had the second highest level of projected shortfall in supply compared with need in the Black Country (after Sandwell) at circa 7,000 dwellings shortfall in the period to 2039.

27. City of Wolverhampton Council published their Local Plan Issues and Preferred Options in February 2024. It identifies a need of some 21,720 dwellings in the City to 2042, with the identified supply (including proposed new allocations and density uplifts) falling far short at just 10,307 dwellings. There is, therefore, an expectation that some 11,413 dwellings will be exported through the Duty to Cooperate, and it is a reasonable assumption that South Staffordshire will need to play a significant role given the strong economic and functional relationship.
28. Further, there are significant unmet needs arising from Birmingham which require attention. Consultation on the Birmingham Local Plan Issues and Options was conducted in October to December 2022. It set out a Local Housing Need derived from the Standard Method for the city in the period 2020 to 2042 of some 149,286 dwellings, with total identified housing supply in the same period of just 70,871 dwellings. This results in an enormous shortfall of some 78,415 dwellings to 2042, with no defined contributions to this shortfall made as yet and likely significant difficulty to accommodate these in neighbouring authorities given the existing housing land supply limitations.
29. 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 simply seeks to focus growth to non-Green Belt sites and limited Green Belt development in Tier 1 settlements well served by public transport, rather than through due consideration of the level of unmet needs and how these could be accommodated in South Staffordshire. This is wholly inadequate.

⁴ Paragraph: 004 Reference ID: 2a-004-20201216 of National Guidance



30. It is clear that Wolverhampton cannot meet its housing need within its boundaries in a way that is compliant with the policies in the NPPF. There is not voluntary cross border agreement on the level of unmet needs that South Staffordshire are proposing to make provision for, therefore the Council are required to help in ensuring Wolverhampton's overspill is met in full⁵. The low level of overspill that South Staffordshire are proposing to accommodate does not do that.
31. Indeed, the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) – Assessment of Housing Land (December 2023) identifies land which could deliver more than 100,000 new dwellings in South Staffordshire, of which 71,839 dwellings are only considered not currently suitable due to constraints. The key constraint for a significant proportion of these sites is the Green Belt, which is a policy designation as opposed to a fundamental environment barrier.
32. On the basis of the above, it is considered that the substantial unmet needs of the GBBCHMA should be addressed. The SSLPR makes a far too limited contribution to the unmet needs of the GBBCHMA, given such unmet needs are so significant and increasing. It is therefore considered the SSLPR must accommodate further growth in order to be considered positively prepared and thus sound at Examination. It is suggested that the starting point should be 4,000 dwellings, aligned with the contribution proposed in the 2022 version of the SSLPR Publication Plan and as recognised by the Black Country authorities, with an appropriate increase to take account of the significant growing unmet needs of the Black Country including specifically Wolverhampton, and substantial unmet needs arising from Birmingham.

Buffer

33. Draft Policy DS4 reports a buffer of approximately 10% in housing supply, providing for 5,199 dwellings in supply as set out in Table 7 against a Housing Requirement of 4,726 dwellings.
34. However, it is considered that a 10% buffer is insufficient to afford the appropriate level of assurance and flexibility in housing supply for the Plan period. Indeed, the

⁵ Paragraph 62 of the NPPF



proposed buffer has reduced from the 2022 version of the SSLPR Publication Plan which reported a buffer of circa 13%.

35. The Local Plans Expert Group recommended to Government in 2016 that a further allowance should be made, equivalent to 20% of the Housing Requirement, in developable reserve sites to provide extra flexibility to respond to change⁶, with the introduction of the Standard Method for calculating Local Housing Need not invalidating nor inherently taking account of this advice.
36. A 20% buffer would provide flexibility across housing supply to ensure local housing needs can be met even in circumstances where assumed supply does not come forward as anticipated. We consider that it is appropriate to incorporate a buffer into the Housing Requirement, as opposed to being reported on based on the level of identified supply as is the case in the SSLPR Publication document, to ensure this flexibility is taken into account in determining the most appropriate strategy to meet the level of need.

Commitments

37. Draft Policy DS4 identifies that a significant proportion of the identified housing supply is made up of commitments, i.e. sites with planning permission.
38. We note in the supporting Housing Site Selection Topic Paper (2024) that a significant number of sites with planning permission that have not yet commenced are included in the housing supply, without any account taken of the potential for such planning permissions to lapse if unimplemented. It is considered that a minimum 10% lapse rate should be applied to commitments not started, to ensure the supply is robust.

Windfall Allowance

39. Draft Policy DS4 seeks to incorporate a windfall allowance of 600 dwellings on small sites in the housing supply. This has been carried forward from the 2022 version of the SSLPR Publication Plan, but at an increased proportion of the total housing supply identified; up to 11.5% from 5.8%.

⁶ [Local-plans-report-to-governement.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Local-plans-report-to-governement.pdf)



40. Evidence has been provided to seek to justify the windfall allowance in the SHELAA – Assessment of Housing Land, however the NPPF requires compelling evidence that windfall sites will provide a reliable source of supply⁷.
41. We have concerns with the inclusion of any windfall allowance in South Staffordshire. Whilst recent windfall delivery rates may have been strong, given the emerging Local Plan Review only seeks to maintain existing policy mechanisms for windfall development, rather than expand the scope for windfall delivery, the ability for windfall delivery rates to persist is queried. Indeed, it is noted that the SHELAA only reports to 2020, with data not available for the intervening period.
42. Further, the Council's supporting SHELAA Assessment of Housing Land is highly detailed and contains a significant number of land holdings, including those small enough to be considered only suitable to deliver a single dwelling. As all sites identified in the SHELAA cannot be considered to meet the definition of a windfall site as set out in the NPPF⁸, there is considered to be significantly limited opportunities for windfall development in the District. This is particularly noteworthy in the context of substantial Green Belt coverage in South Staffordshire, tightly drawn Development Boundaries and a policy framework in the emerging SSLPR which seeks to heavily restrict Green Belt and open countryside residential development.
43. As such, we consider the windfall allowance should be removed from the housing supply in draft Policy DS4.

Conclusions on Housing Requirement and Supply

44. Bringing together all of the points above, it is considered that there is likely to be a significant shortfall in housing supply planned for in the draft SSLPR. This is before any additional contributions to the unmet needs of the GBBCHMA over and above the minimum 4,000 dwellings are considered, and without any reductions to the level of commitments is made, both of which are queried in these representations without being quantified. This is also without detailed analysis of carried forward, safeguarded

⁷ Paragraph 72 of the NPPF

⁸ Glossary of the NPPF



land and proposed new allocations, which could further reduce the level of supply and increase the shortfall. This is illustrated in Table 1 below:

**Table 1: Marrons Assessment of SSLPR
Housing Requirement and Supply**

Housing Requirement	
Standard Method 2023-2043 (20 x 227)	4,450
GBBCHMA Contribution	4,000*
<i>Housing Requirement</i>	<i>8,540</i>
Buffer (20%)	1,708
<i>Housing Requirement including 20% Buffer</i>	<i>10,248</i>
Housing Supply	
Planning Permissions and Carried Forward Allocations	1,070*
Windfall Allowance	0
Safeguarded Land	1,604*
New Allocations	1,925*
<i>Housing Supply</i>	<i>4,599</i>
Balance	5,649 dwellings supply shortfall

45. In conclusion, we consider that the SSLPR Plan period should be extended until at least 2043 to ensure compliance with the NPPF. An increase in the level of contributions being made to the unmet needs of the GBBCHMA is also necessary, to a minimum of 4,000 dwellings as previously set out, recognising the significance of the identified shortfall in supply against need. In addition, a buffer of 20% should be applied to include sufficient flexibility in housing supply. Further, a reduction to the level of commitments through a 10% lapse rate on sites not started should be applied, in addition to the removal of a windfall allowance, to understand the genuine supply and prospects of meeting the Housing Requirement.



46. Considering all of these elements collectively, we identify a significant shortfall in supply as set out in Table 1 above. This should be rectified through the allocation of additional sites, including Land north of Bridgnorth Road, Wombourne.

Policy DS5: The Spatial Strategy to 2041

Settlement Hierarchy

47. The Plan is not sound as it inconsistent with national policy and not justified based on the supporting evidence.

48. 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.

49. 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.

50. Furthermore, the RFSA 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 much 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.

51. 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 44.3ha of



employment land, such as Heathmill Road and Smestow Bridge Industrial Estates, which provide employment opportunities, as well as other employment generating uses in the settlement centre and around the settlement.

52. 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

53. In determining the settlement hierarchy, consideration has not been given to the relative size of the settlement and in turn the housing needs that it is likely to generate on its own. The Plan is therefore unsound as it is not positively prepared.
54. For instance, Wombourne, which has a population that is greater than some of the Tier 1 settlements, but is providing only a small amount of new housing to meet its own housing needs.
55. Furthermore, an analysis of commuting patterns from South Staffordshire residents to Birmingham as well as the remainder of the Greater Birmingham Housing Market Area, demonstrates 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 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 areas, whose housing and social needs should be planned for.
56. 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, downsize or upsize.



Southern Sub Area

57. In respect of Wombourne, it is located within the Southern Sub Area as prescribed by the Council's SHMA, within which a need of 1,291 dwellings is identified over the Plan period. By way of comparison, an analysis of the planned housing supply as identified in the Plan totals only 410 dwellings within the Southern Sub Area. At present, there therefore exists an unmet need within the Southern sub area of approximately 881 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

58. 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.

59. 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.

Approach to Green Belt

60. Part of the rationale for the Council's Spatial Strategy approach relies on the most recent revisions to the NPPF. Yet, in essence the approach taken in the NPPF remains unchanged, i.e. that there is no *requirement* to alter Green Belt boundaries



but if it is proposed it must be fully justified. We consider that the substantial unmet needs arising from the GBBCHMA represent cogent exceptional circumstances for Green Belt boundary amendments.

61. 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. This would align with commentary in the South Staffordshire Green Belt Study (July 2019) at Paragraph 7.10 which states:

“Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in very high harm to the Green Belt. In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation”.

Policy SA3: Housing Allocations

62. 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.
63. As drafted, we consider Policy SA3 is not justified and therefore cannot be considered sound in line with the NPPF⁹.
64. 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' conclusion. It is on this basis that the Plan has erred and Site 283 should be allocated.
65. In summary, Site 283 is suitable, available and deliverable. Furthermore, there are some notable advantages from the allocation of this site as follows:

⁹ Paragraph 35 of the NPPF



66. 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.
67. The landscape framework will create a distinct sense of place, provide opportunities for biodiversity net gain, and enhance existing neighbouring woodland.
68. 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.
69. 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.
70. 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.
71. Development would ensure appropriate contributions towards existing facilities and infrastructure including health, education, sport, recreation and public transport.
72. 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.



73. 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.

Sustainability Appraisal

74. 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.

75. Following the trail of evidence 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 (see representations in relation to the Green Belt). This is different to what is concluded for the western area of the Site, such that it is moderate harm (which evidence submitted with these representations suggest is an incorrect judgement) and different to the conclusion overall.

76. It is not appropriate for the Green Belt Study to have been used as a criteria for the Sustainability Appraisal rather than the Landscape Sensitivity assessment only, which would conclude differently in relation to the assessment of Sites.

77. Section 2 of the Landscape Position Paper, accompanying these representations, considers this element of the SA to be flawed.

78. The SA should be amended to be consistent with the Housing Site Selection Topic Paper and vice versa.

79. The Green Belt Study results should not form part of the assessment criteria for landscape in the SA.