

From: [REDACTED]
To: [External Email for Local Plans](#)
Subject: Local Plan Consultation
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To whom it may concern,
Regulation 19 Local Plan Response December 2022

Dear Sir or Madam,

Site 582 Langley Road, Lower Penn.

Whilst the objections I am raising are related to Site 582, they are also relevant to Sites 350 (Radford Lane) and 484 (Springhill Lane) should they rear their heads in the future.

Transport and Infrastructure

My main concern is the road network in and around Lower Penn. The lanes are only just coping with today's traffic, thanks to the increase generated by the Children's Nursery at the top of Springhill Lane, let alone any increase from proposed developments. Witness the recent accidents down Greyhound Lane and Dean Road.

The nearest Staffordshire primary and secondary schools are in Wombourne with the obvious route from Langley Road being Market Lane, Dean Road, Orton Lane and into Wombourne. This would be contrary to S. Staffs DC own Policies Document that specifies no further increase in traffic through the Conservation zone. Lower Penn village is a Conservation Area.

How will the site be accessed? All 390 properties issuing onto Langley Road? Cross Authority agreement with Wolverhampton CC to access off Bellencroft Gardens? I'm sure their residents would be overjoyed!

The area is not well served by public transport, thereby putting 390 homes onto the roads (whether they have electric cars or not) for every aspect of life :- work, school, shopping, doctor, dentist, entertainment, etc. In the days of post COP26 this irresponsible to say the least.

Services

As mentioned earlier the nearest Staffordshire schools are in Wombourne, over 5 miles away, and although they have spaces at the moment, these will soon be taken up by current and proposed developments in and immediately around Wombourne.

Local Wolverhampton schools are either oversubscribed or very near capacity, certainly not enough spaces to cope with the influx of children that a new estate with 30% affordable and upto 70% 2 and 3 bedroom family homes would bring. (Your own figures).

There are a few shops but no supermarket.

There are no doctor's surgeries within walking distance and the nearest ones are oversubscribed. Dentists likewise.

Where will Police, Fire and Ambulance be served from? Being on the boundary who will take responsibility?

Employment

The Plan has identified S Staffs areas of employment being in the north of the District, so any residents of any Lower Penn development would have to travel to any new work created in those areas.

In answer to the specific questions :-

Q8. Do you support the proposed housing allocation in Policy SA5? NO

Q2. Do you agree that the correct infrastructure to be delivered alongside proposed site allocations has been identified in the IDP? NO

Q4. Do you support the policy approach in DS1 green belt and policy DS2 open space NO The NPPF says “ the green belt protects against urban sprawl “ Not here it doesn't There needs to be a boundary between town and country (the green belt). This development is moving the boundary. Where will it stop? When we have reached Seisdon? Have the relevant wildlife surveys been carried out? Bats, badgers, newts and any other protected species.

Generally

With regards to the concerns about building on the green belt: the Mayor of the West Midlands, Andy Street has said “ Dudley, (based on current calculations), should not have to give up any of it's green belt to meet the need for new homes”. He goes on to say “they are meeting their needs through the brownfield first policy”.

He is also pursuing this policy throughout the whole of the West Midlands Combined Authorities.

His use of the phrase “ current calculations “ is most important here, as the figures used in calculating the need for housing (nationally 300000?) were based on 2018 ONS data.

This is now outdated with well over a million EU citizens having the UK following Brexit. I quote from a letter sent to your Local Plans Team from Mike Wood MP:-

“The substantial work done to remediate former industrial land in Dudley and across the wider Black Country means that I am confident that we have sufficient sites to meet our housing needs and to absorb our share of the overspill from the Birmingham area”.

He goes on to say “ that following the work done to bring more brownfield sites back into use, the shortfall in available accommodation that was certainly a genuine consideration until very recently, can now be addressed within the existing urban area without needing to build housing on green belt land in South Staffs”.

He also campaigned vigorously to protect the Holbeach and Wall Heath green belt areas on the Dudley side of the boundary with. S.Staffs.

So if Dudley doesn't need to build on it's Green Belt land, why do we?

Surely our Duty to Cooperate figure can be reduced from the disproportionate 4000 homes, when the District has identified it only needs 4881 to meet its own needs (again based on the outdated 2018 figures).

Have the 11000 empty properties across Staffordshire and the Black Country (recent Government figures released this week) been taken into account?

With the Boundary Commission's proposed changes for 2023, when our constituency becomes “Kingswinford and South Staffs CC”, will that have any bearing on the number of homes calculated to be allocated under the Duty to Cooperate? (Proposed boundary change puts Holbeach and Wall Heath in new area.)

Should this and any other developments get the go ahead, will any Section 106 (Developer Obligations) be imposed with regards to any of the many associated problems?

The above is a copy of the email I sent to yourselves in December 2021 outlining my objections to the development site 582 Langley Road, Lower Penn.

Things have advanced since then with the Black Country Plan having fallen apart and changes in Government thinking.

With the Leader of Dudley Council stating that they are not going to build on their Green Belt then why should we. If the Duty to Cooperate is integral to the Local Plan legislation, then suspend the pursuit of the Plan until things are much clearer, as other Councils throughout the country have done.

I would finish by saying that I don't consider the whole consultation process is “Sound“ as the only way we have found out about has been by word of mouth. The Review magazine, where apparently we were to find out about the Plan, was not delivered and trying to navigate the technical jargon on the web site was to the layman unnecessarily complicated. In short the District Council have failed in their duty to consult with the Community.

Hugh Davies



Sent from my iPad