

Joint Response/Objection to the South Staffordshire District Council's Local Plan Review (November 2022)

Senders: Mr Raymond Faulkner
Mrs Avery Faulkner

Address: 

Date: 13/12/2021

Method: Email (email address: )

Sites to which this response relates to:

Village	Site Ref No.	Use	Site Location	Minimum Capacity (dwellings)
Wombourne	416	Residential	Land off Orton Lane	57
Wombourne	285, 562/415, 459	Residential	Pool House Road	218
Wombourne	463 & 284	Residential	Land off Billy Bunns Lane and Gilbert Lane	223
Wombourne	286	Residential	Land adjacent 63 Sytch Lane	16

Reasons the plan is not 'sound':

To use an analogy, the Plan content is like the lazy student who has chosen the outcome for their dissertation and, in the absence of thorough research, desperately searches for theories to support their goal.

Lack of adequate public consultation:

- The plan states 'that your views have helped us set out a strategy'. Who does this relate to? It does not apply to the residents of South Staffordshire. Most only heard via word of mouth a little over twelve months ago, some only heard about this recently.
- Challenges to the above have been met with "it's on the website", "it's in the Review Magazine".
 - How many people look at a Council website unless looking for something specific?

- It is known that there are problems such that the Review Magazine does not reach residents. We cannot recall when we last saw one. We have learned that this has also been moved to online.
- The ignorance shown by council staff that “most people use computers” is astounding. This is not the case, there are still lots of people who do not use computers and reliance on online communication is short-sighted or deliberately obstructive.
- A direct mailing should have been sent to each household just as you do when send out the council tax bills.
- The two consultations we have found out about (not via the council but from others), have been conducted just before Christmas. The golden rule of public consultation is that you do not complete any type of consultation during December. This is when you are least likely to have effective engagement. This again, seems like a deliberate act to avoid challenge.
- The language used is too complex for the average reader to understand. The document is too long for the lay person and contains too much jargon. Therefore, there should have been an easy read version of the document for the general public. We spoke to one lady who said she felt like she had completed a crash course in planning law before she could put pen to paper. Bearing in mind that this is only made available online and, those able to access it are viewing mainly on small handheld devices.
- As well as poor timing, insufficient time has been given to enable the public it affects to respond effectively.
- Whilst standing behind the excuse of “we are following legislation”, council staff have missed opportunities to conduct a thorough consultation using techniques that are proven to work in other local and national Government organisations. This feels that this is a another deliberate act to avoid challenge.
- The planners have made their process far too complicated for people to respond. The online portal is too cumbersome and complicated that many won't use it. Why do responses have to be in writing? This excludes a vast number of people who feel unable to express themselves in writing but are happy to give verbal feedback.
- Hard to reach groups have been excluded.
- The planners, particularly the head planner, does not create an environment that is conducive to effective consultation or communication. The head planner's communication style is aggressive and intimidating. Her failure to listen, cutting off people before they have finished has resulted in her taking their questions out of context. The words “handles the truth carelessly” come to mind too, as well as being contrary. This speaks loud and clear that this was a “done deal” from the beginning. Her response to most questions is “we've done it” but fails to respond as to what exactly has been done, such as when questioned about how hard to reach groups have been consulted with.
- There should be an independent evaluation of the consultation process.

Decision making and accountability:

- The fact that Police were present to keep the public out of a public meeting is indicative of the Planners' determination to not be challenged. This was a waste of public money and resources when the Police service is so stretched there are insufficient Police available to attend an aggravated burglary.
- It is concerning that Councillors openly admitted that they did not support the content of the Local Plan and only voted because the most pressing need is to have a plan, no matter what the content.
- Councillors openly admitted that they had been contacted prior to the vote by individuals trying to influence and persuading them to vote to accept the plan. Surely, this is corruption and not legal?
- As mentioned above, there needs to be an independent review.

Failure to act on changes to legislation that will impact on the Local Plan:

- South Staffordshire Council is failing to act on Government proposals for new measures to strengthen commitment to building enough of the right homes in the right places with the right infrastructure.
- Wombourne does not have the right infrastructure to accommodate the number of houses being forced on us by the planners.
 - Our local GPs are struggling to provide an adequate service since the recent two large estates were built. Our own practice only heard of the last so called consultation when it was too late and their response rejected.
 - Our schools cannot accommodate more pupils.
 - Our roads are not built for the extra traffic.
 - We already have a problem with flooding which will be made worse when the greenbelt and flood plains are built on.
- Other local authorities, including those South Staffs is supposed to have a Duty to Cooperate with have taken a step back so why are South Staffs plans blundering ahead with these ill-advised plans that will have a negative impact on generations to come?

Brownfield sites and empty properties before greenfield sites

- The Housing White Paper of Feb 2017 says you can only build on the green-belt if all other options have been exhausted.
- There are plenty of unused brown-field sites that could be used in neighbouring boroughs Wolverhampton, Dudley and Sandwell, that should be used first, as well as the large Copart site in Wombourne. The fact that it is more costly (and less profit) for developers to prepare a brown-field site than it is to build on green-belt is not good reason to build on our green-belt.
- There are 11,193 disused empty houses in the Black Country and Staffordshire that should be used before sacrificing our green land. Green-belt and safeguarded land should only be used as a very last resort when all other options have been exhausted. We do not believe that to be the case given the number of brown sites and disused housing around the Black Country in particular. By definition Green-belt and Safeguarded land should not be readily available for building on.
- Andy Street, West Midlands Mayor, has stated there are enough brown sites that can be used to meet expected housing shortages for the next ten years.
- We feel very strongly that our green-belt and safeguarded land should not be sacrificed given the Black Country are not sacrificing their own green-belt and safeguarded land.
- Changes to retail and office provision, accelerated due to the COVID situation, would increase land available in the Black Country if these existing buildings cannot be repurposed.

Infrastructure Healthcare

- As mentioned above, the two existing GP practices are currently working beyond capacity, they are struggling to manage the current demand from the residents of Wombourne and the surrounding villages who access those practices, with the additional burden from recent new build estates. The Council had not even contacted them directly to make them aware of the proposals. They GP practices are as shocked and annoyed as the residents with regard to the proposal. This is extremely poor practice on the Council's part.
- We do not have access to NHS dental services. All dental services do not have capacity to take on any more patients or are private (and not affordable for the majority). We

already travel quite a distance to the nearest dentist that could take us on. This will only get worse.

- We do not even have a hospital. Bridgnorth (classed as a town but has a lower population) has its own hospital. We only have to access hospitals commissioned by other health organisations. This causes logistical problems with regard to access.
- We have already lost our ambulance station. This will be worse if there are more people living in the village which will increase the demand for ambulance services with longer response times. Ultimately, this will lead to unnecessary deaths due to delayed treatment.

Infrastructure - Education

- The schools in Wombourne take in students from Wombourne, the surrounding villages and beyond. They do not have the capacity to take the anticipated increase of students from the proposed new builds.
- As with healthcare outlined above, it is irresponsible of the Council to create a problem for the education department to have to fix. How can this be fixed? Extending existing school premises or building new schools will not solve the problem. There is also a shortage of teachers. It is not an attractive profession to go into nowadays.
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Infrastructure - Lack of Policing / Increased Crime

- Policing is another service that has been eroded in recent years since the lack of a fully staffed, working Police station (an part-time office base at the Civic Centre does not suffice), and a reduced presence of Police in the area. There has been a huge increase in crime in Wombourne and surrounding villages. We are often quoted statistics that say otherwise but that is because the crimes are not being recorded and dealt with. When there was a targeted aggravated burglary where machetes were used, the nearest Police on duty were an hour's drive away.
- There will be more crime if this plan goes ahead and more examples of the above. As has been stated, 70% of the dwellings will not be 'affordable', that means people of considerable wealth will be the only ones who can afford to buy these properties. This will attract undesirables for targeted break-ins and thefts knowing that the area is an easy target due to the lack of policing.
- We were told you do not have to consult with the Police authorities. Just because you don't legally have to doesn't mean that you shouldn't!

Infrastructure - Roads, Increase in Traffic, Congestion, Pollution

- 223 houses are proposed for fields around School Road, Billy Buns Lane and Gilberts Lane. These are already extremely busy roads. They will not be able to cope with the construction vehicles when the new estates are being built and, thereafter, the increase in vehicles used by the incoming dwellers.
- Having houses at Billy Buns Lane directly by the island is going to cause further congestion and traffic issues.
- Poolhouse Road is a single lane 40mph road (although many cars go way above 40mph) with no crossing at all. At the end of the road there is a T-Junction where cars already queue and struggle to turn out of even when it is not peak times. This needs to be addressed and is a definite issue as an additional potential 446 - 669 (2-3 cars per proposed house) would just cause chaos.
- Wombourne and the surrounding villages (all commuter villages due to the lack of local employment) do not have good transport links. The nearest motorway junctions (M5, M6, M54) are all approximately 11 miles away. The nearest main roads are already extremely congested (we both speak from experience of our difficulties travelling to and from our workplaces). The busy roads around Wombourne are so congested at peak times that the

villages are used as a short cut. Commuters would sooner queue to drive through the village than sit in the traffic jams on the 'A' roads.

- The increase in cars will increase pollution and work against Government policies to reduce carbon emissions.
- The roads in the village are a disgrace. We have first-hand experience of car damage (and costly repair bills) due to the many potholes. If whichever authority responsible for repairs and maintenance is unable to maintain and repair the roads currently, which seems to be the case, what state will our road be in with the inevitable increase in traffic?
- We do not believe that the main routes in and out of Wombourne can accommodate any further traffic and therefore other alternatives such as the Gailey Island/Penkridge proposal should be the preferred site for development. They have a railway station with good commuter links by rail and main A449 road links too with easy access to the local motorways.

Infrastructure - Public Transport

- Public transport links are poor and inadequate with no rail links, very infrequent bus services and no bus route through much of Wombourne such as Poolhouse Road despite there already being Millfield Estate and new housing near the Round Oak Pub. This clearly shows the reality is that buses will not be provided along Poolhouse Road, the nearest bus stop is at the New Inn pub which is too far for many to walk to and the buses are not very regular either. This is in part because, or so we have been told, because South Staffordshire District Council will not invest in West Midlands Passenger Transport for them to improve services. Not forgetting there is a lack of drivers due to European drivers returning to their native countries post-Brexit. It is easier and quicker to travel by car, even with the congested roads, thus adding to the congestion and pollution. This will increase with the influx of new residents.
- There is no direct public transport to the nearest hospitals. It is easier and often essential to travel by car. Again, there will be an increase in the number of cars travelling to and from these hospitals if this plan goes ahead, creating further congestion, delays and pollution.

Increased Flood Risk

- Wombourne has a series of brooks running through it, there is no other natural drainage except for soakaways within the green land surrounding the village. With any rainfall, Poolhouse Road floods and when there has been significant rainfall Wombrook has flooded, causing damage to local properties. The incidences of flooding will increase due to additional housing developments.
- We have heard it will be the responsibility of the developer to address the loss of natural soakaways. We are sure developers will argue that drainage solutions will be an improvement on the current situation. But building on green land that has natural drainage and not allowing the land to provide natural protection against flooding will increase the flood risk. Just because the developer says they will put measures in place does not mean that they will. The Council does not have a good record of ensuring that conditions related to planning permission have been met. We only have to look at what happened when Sainsbury's was built to find evidence of that.

Protection of the Green Belt / Green Spaces and Preservation of Agricultural Land

- The green-belt is essential for our natural eco-system, important for human survival. The areas proposed are home to wildlife that is part of that eco-system and fast becoming extinct.

- The green-belt is an important part of the water table and provides a natural soakaway for the excessive rainwater we are familiar with. As mentioned above, remove the soakaway and there will be more of the flooding we have experienced in recent years attributed to earlier newbuilds.
- The pandemic and multiple lockdowns have emphasized the need to have more green open space. There is lots of evidence out there that those living in cities and towns with little or no access to green open space fared worse in terms of physical and mental health. Wombourne is fast becoming one of those towns if this plan goes ahead. We already have difficulty accessing a doctor's appointment. We cannot risk increasing ill-health in our population by taking away what God gave us to keep us well.
- Agricultural land needs to be preserved, farmers work very hard for a living and taking away land they rent and work on is extremely concerning. It is not easy for farmers to find alternative land to rent and this will result in unemployment for some of the farmers who have invested their lives in agriculture. We understand from a local farmer how hard it is to secure alternative land to rent. It is a concern of the National Farmers Union too who no doubt object to plans to build on agricultural land.
- We live in a country that relies on other countries for the supply of food. The current supply issue, with threats of food shortages greater than we have experienced to date, is damning evidence that we need to invest in our own food production industry and that includes increasing farming opportunities rather than taking them away.
- When it's gone, it's gone!

The Destruction of Natural Habitats

- There is a great deal of wildlife whose habits will be affected or taken away by building on this land. Grass snakes have been seen in the fields (site 285). Owls, bats, woodpeckers, jays, birds of prey, and barn owls have also been seen. Building on these fields will destroy the habits of this wildlife and should not be allowed.
- Planting tree-lined street (as stated in the Q&Q session) does not provide natural habitat for the wildlife we have sighted and does not compensate for the destruction of the natural green land. The destruction of the habitat and the disruption of the building on the land will destroy the natural wildlife in the area.

Climate Emergency

- In 2019, South Staffordshire County Council declared a climate emergency. It is therefore imperative that the development plans work in tandem with the aims of achieving net zero emissions. Any developments need to strongly enhance the improvements, this cannot be achieved by developing on green sites before fully utilising brown sites.
- Given that the UK hosted the COP 26 Climate Change Summit earlier this year, proposing to build on green-belt and safeguarded land is contradictory to the aims and pledges made at the summit. Green land absorbs CO2 naturally along with providing natural drainage. The UK Centre of Ecology and Hydrology are monitoring the loss of agricultural land across the UK in order to assess the negative impact it has upon climate change. They are concerned at how urban sprawl is taking agricultural land and the impact it is having on the environment. Green land is also vital and crucial for well-being and mental health. Taking this away with destructive on many levels.

Urban Sprawl

- Wombourne is a village. A village is supposed to have green land surrounding it separating it from other areas and main roads such as the A449. Housing is supposed to be spaced out and not one massive housing estate in order for it to be a village. Building

around Billy Buns Lane in particular will create urban sprawl and Wombourne will no longer be a village by definition.

Loss of Historical Significance

- Wombourne is barely holding onto the 'village' status. Will we become part of the suburban sprawl, with boundaries between Wolverhampton blurred and lose our character.