	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

This form has two parts –
 Part A – Personal Details: need only be completed once.
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal 2. Agent's Details (if Details* applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	No agent
First Name	Nicholas	
Last Name	Greenwood	
Job Title	N/a	
Organisation	N/A	
Address Line 1	████████████████████	
Line 2	██████████	
Line 3	██████	
Line 4		
Post Code		
Telephone Number	██████████████	



Email Address	<div style="background-color: black; width: 100%; height: 15px;"></div>	
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

9. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

10. Do you consider the Local Plan is :

(10) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(11) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(12) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

17. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The plan says strategy G is to "locate new housing in locations with better access to existing infrastructure and services " .

The council in the search for sites the Council has just re-used the GBHMA report, which is avowedly based on the needs of the conurbation.

See Para 1.69 "

- Ability to meet housing needs – as identified the unmet housing need is particularly that of "the conurbation" and thus the geographic relationship to the conurbation and distance of locations from this is, we think, an important consideration; "

This means the sites are clustered near to the conurbation. It's noticeable that the map used to show contribution to the Green Belt aims of stopping merging (see below) shade in a large area between Stourbridge and Kidderminster which are miles apart, but don't consider Wombourne as a town, and actually don't even show the 7 Cornfields area as contributing except for a thin line of 'sprawl' avoidance. Two of the developments in the plan will move the boundaries of Wombourne to within 400m of the ribbon development south from Wolverhampton. This is a consequence of the policy of using existing large settlements.

The result of copying the GBHMA report is that there are very few developments considered on the Western edges of S. Staffs, where many of the ageing population of S. Staffs would actually like to move to. Kinver again takes a smaller hit. I acknowledge Codsall and Bilbrook are taking a larger hit this time, but Wombourne, despite being a Tier 2 village is actually larger



The infrastructure-based development strategy argument is threadbare in regard to Wombourne. We haven't got sufficient infrastructure. Wombourne is in danger of become a town – it's already one of the biggest villages in the country.

One aim of the Green Belt is to prevent urbanization of villages.

Wombourne is a Tier 2 village despite being larger than Codsall and Bilbrook (who admittedly are taking a larger hit this time) This shows that Wombourne has outgrown its infrastructure.

I have asked the planners for figures for population/dwelling growth since 1960 for Codsall/Bilbrook, Kinver, and Wombourne. They have been unable to find them. It is true Codsall is taking a big hit this time around, but our local councillors have heard councillors from other parishes trying to avoid 'Wombournisation', i.e. if there's development to be done, put it in Wombourne.

A doctor at the Dale Medical Centre has complained to the parish council that they are at capacity, despite what the CCG says.

Modern Wombourne c. 1960 was a village that used to be around 3000 people 0 expanded to 6000 with the arrival of 2 council estates and private housing.

The infrastructure of the village is adequate for that population. It's the same school, with a few new buildings tacked on, there is a second doctor's which used to be a pub. The massive Poolhouse estate was built in the 70s as a housing-only development. You have to drive to the shops from Poolhouse.

The policy to build in the Green Belt where you have already built in the past has led to Wombourne ballooning from 6,000 in the 60s to the proposed 16,000 with this development.

The road system is inadequate for the size of town.

Wombourne is bounded on the S.W by the B4127 Telford to Dudley Rd, and on the E by the A449.

The main route through from Shropshire to Wolverhampton and Sedgley is a suburban road.

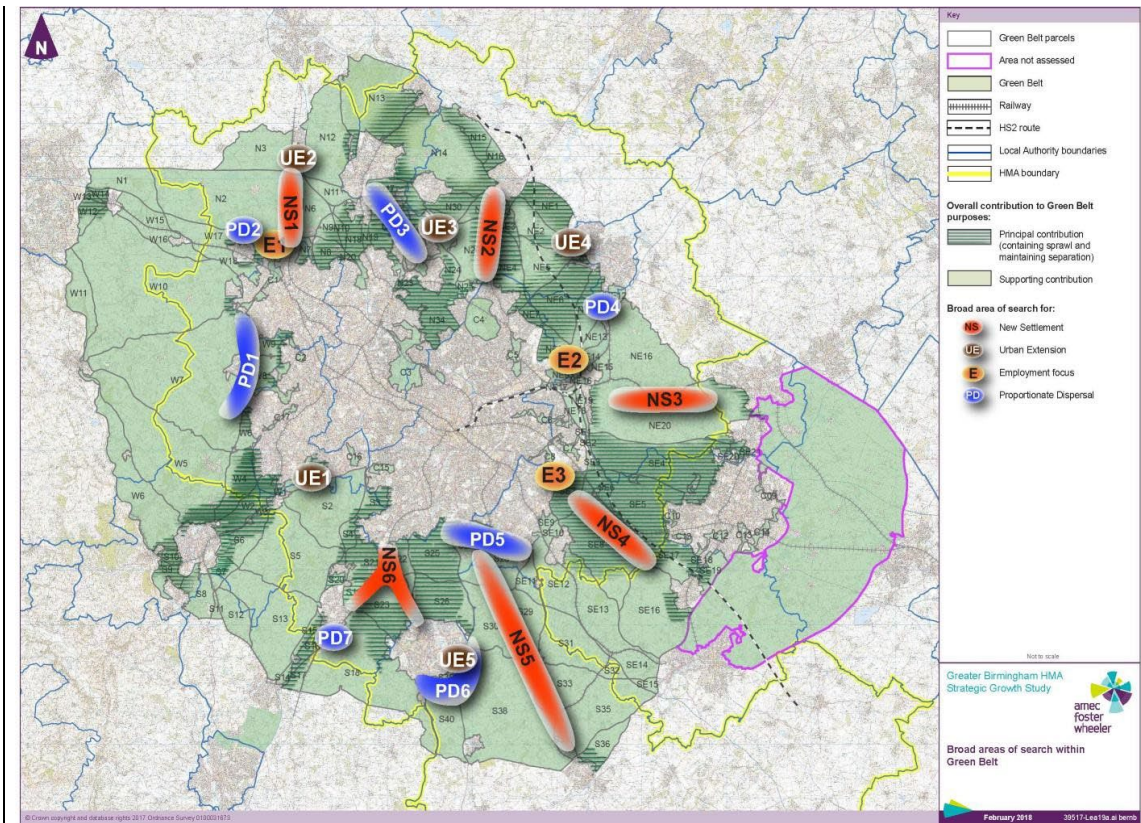
Anybody coming from the West towards Wolverhampton or Sedgely uses the Pool House Rd, Ounsdale Rd, School Rd and Billy Bunn's Lane.

Most packets of land in Wombourne's proposals are along these roads, which are simply suburban roads.

This will mean more lights, or other junctions along these roads, which have 2 schools along them. In particular the Wombourne NE packets of land are close the the A449 Wodehouse Island junction.

The roads are those of the 1960s with a few lights throw in along School Rd/Ounsdale Rd. At the main junction there is a petrol station that regularly blocks traffic. Due to lack of parking, the stretch of Planks Lane near the village is effectively a single-track road for much of the day. That's on the bus route.

The table in 5.21 shows the disproportion of the impact on Wombourne among the Tier 2 settlements. Yet again Wombourne is being singled out as a place to put housing with no new infrastructure.



(Continue on a separate sheet /expand box if necessary)

18. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I think the building in Tier 2 settlements should be balanced, whereas Wombourne is taking the largest share. This isn't strategic. There should at least be a proper traffic plan before the development goes ahead. It appears that a large amount of land has suddenly become available and got thrown into the plan – as I will detail in later objections, as an opportunistic attempt by the council to reach targets.

To meet the aims of the Green Belt, development should be considered further out from the conurbation. This would increase the proportion of building in smaller settlements



(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

19. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

✓

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

20. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX