

CAROL HURLEY

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Here are my comments on the 'soundness' of the South Staffordshire Local Plan:-

LOCAL PLAN REPRESENTATION FORM

A Positively prepared: There has been an overwhelming negative response from Wombourne residents to the way in which this plan has been prepared. The nature of our village is under threat for all the reasons given in responses in the first consultation.

All 6 Wombourne Parish Councillors, who are also South Staffs District Councillors, do not agree with the Foreword of the publication plan, and in my view, neither would the majority of residents if they were aware of the proposals. Methods of communication about consultation have been partial and ineffective as they have been mostly online and in a few public areas with no direct mailing. Therefore a proportion of residents has been disenfranchised and I believe that this is evidence that the plan has not been 'positively prepared.'

We are told that the plan is robust re. infrastructure capacity; this is not the case locally vis a vis GP services in that there is obvious pressure as evidenced by one of our GPs who categorically stated, at Parish Council level, that there was no more leeway in their practice to accommodate extra numbers. Capacity seems to have been measured at an overall District level rather than its applicability to Wombourne, with its increasingly ageing population's need for social care. We do not see clear evidence of assessing school places at local level for extra families with school age pupils. This does not reflect well on the positive preparation of the plan. This lack of evidence also applies to other public services such as Highways, police, fire etc.

B Justified: As a Tier 2 village, Wombourne has already been overdeveloped ; the plan overloads this village relative to the other Tier 2 villages which makes it disproportionate and totally unjustified.

The requirements under the Black Country Plan have changed with the withdrawal of Dudley and other councils. This plan is not justified in terms of the current situation. It still gives Wombourne a large number of dwellings under the Duty to Co-operate when it is no longer clear with whom it is co-operating.

There is no evidence in the plan for the requirement for developers to build affordable homes with concomitant facilities; therefore no obvious justification. Recent developments in Wombourne are all overpriced dwellings many of which are still standing empty years

after they have been on the market. This is evidence that further development of this nature is not justified.

There is no strategy linking the proposed sites with viable employment, health, education, recreation and shopping facilities.

No justification for the development of specific sites 463 and 284 has been given with regard to 'openness' of greenbelt areas which, if developed as per the plan would ride roughshod over the environmental sustainability of the greenbelt and over the heritage of our historic village. If these two specific sites were to be pursued, we would see ribbon development making Wombourne a continuation of Wolverhampton and Dudley urban settlements. We do not believe that the plan is justified because there has been no real exploration of other possible sites e.g. Copart and the land opposite the Poolhouse.

C Effective: Short term solutions seem to have been prioritised over long term strategic planning. This is evidenced by the designation of **284 and 463** as the gateway to the village being destroyed as an easy option.

Local issues seem to have been sacrificed for expediency which does not reflect local opinion or need. There is no evidence of detailed cross-boundary impact on issues of vital importance to residents. Therefore this is not an effective local plan.

D National Policy: This plan in no way adheres to national policy on sustainability. Instead of which, there is sole emphasis on housing without the linkage with the requirements that this would necessitate. Very recent debates and decisions in Parliament are very much in line with our objections stated in the first round of consultation. The Local Plan does not align with the principle of taking residents views into consideration and with the philosophy underpinning how new development should be decided locally. The evidence for this lies in current parliamentary debate and decision making in which our local MP has supported the views of myself and the majority of Wombourne residents. This Local Plan is not consistent with the principles and specific requirements reflected in the report stage of the Levelling up and Regeneration Bill, following its first and second readings. It would be unwise and irresponsible to accept this Local Plan without adherence to current likely changes nationally which would align more closely with local opinion.