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22<sup>th</sup> December 2022

We are writing to formally object to the proposed preferred options within the Local Plan Review 285, 459, 415, 562, 416 and particularly 463 and 284, green belt land in Wombourne.

Firstly, we will comment on the consultation process. The majority of Wombourne residents were not aware that land near Pool House and Orton Lane had been removed from green belt. This had been passed with little consultation with village residents. The consultation procedures in place at the time failed and the final decision did not represent the views of the community.

Similarly with the first round of the current consultation (Local Plan Review), it has been left up to residents to inform other villagers of the proposal. We were informed at a face to face consultation meeting with the planners it would be advertised in the 'Review' paper sent to all residents, (10<sup>th</sup> December 2021), neither we or the majority of Wombourne residents have received a copy. Many residents particularly the elderly do not use the internet so have been excluded.

Again with the current consultation, no notice has been given to us or our neighbours. Unless somebody is a member of Facebook and following the correct group there is no way of knowing this consultation is taking place.

Consultation notices have been labelled the 'Local Plan'. The majority of people do not know what the term 'Local Plan' means and is a phrase used by planners. To ensure the engagement and involvement of residents it should be marked as 'Proposed land to be used for building'. The consultation was not face to face with planners at the Consultation event Planners and representatives of the Council failed to fully answer questions and provided generic answers which could not be challenged as only written questions were responded to. We would therefore argue that the Council has failed in its statutory duty to consult.

Our main objections are concerned with increase pressure on the village of Wombourne's already stretched services and infrastructure and the removal of further green belt for housing development (463 and 284).

**1. Expansion without investment in infrastructure and services**

In 1951 the population of Wombourne was 3,838, this expanded rapidly to 14,157 in 2011. The central areas of the village are currently laid out to accommodate the original small village population. The roads are narrow and already struggle to meet the needs of the current population. The roads around the green are one way and become gridlocked at busy times of the day. Recently a number of developments have taken place in Wombourne. Beggars Bush Lane 90 houses, Himley Meadow 102 houses, Woottonbrook 32 houses and a new estates locally at Baggeridge, Gospel End. There have also been numerous smaller developments. The new developments combined with other estates developed in the last twenty years, including Penleigh Gardens, Bumblehole Meadows, Toll house Way,

Holendene Way and developments along and behind Brick Bridge Lane, have taken place without any investment in the infrastructure or services within Wombourne.

## **2. Increase traffic, pollution and environmental damage**

It does not appear there has been a 'Traffic Impact Assessment'. There is already considerable congestion around School Road, Ounsdale Road, Planks Lane, Sytch Lane, Church Road and High Street particularly around school opening and closing times. Additional housing will exacerbate this problem leading to safety concerns for children and young people walking to school. The main commuter route along the A449 will also see further congestion leaving the village just before a roundabout. There has also been a significant deterioration in roads in and around the village which will see further degradation with greater traffic. There has been a notable increase in traffic in the village with the two new estates completed and a third nearing completion. Issues such as pot holes and cracks appearing are common. Many pavements are also in a poor state of repair causing a significant risk to the elderly or those with mobility issues.

It is unlikely schools currently not oversubscribed will be able to meet the demands from the proposed new housing levels. Some parents will find themselves in a position of having to drive either into Wolverhampton or elsewhere for a school place. This development will lead to environmental challenges and further pollution.

The majority of new housing will bring new people to the area mainly from the Black Country region. These will mostly commute to work, increasing traffic out of the village towards, Stourbridge, Sedgley, Dudley, and Wolverhampton, all currently busy routes.

Wombourne is not served by a train service and only has limited bus routes. Increased car journeys will have an increase in the impact to the environment. There is no practical route for cycling to a train station.

## **3. Health services**

Residents of Wombourne are currently finding it very difficult to get a GP appointment. More GP's are required currently but there is a national shortage, made worse by Brexit and qualified doctors not choosing to work in general practice. This situation will be made worse as all new residents will need to register. Even if money is provided for new buildings, trained staff are not currently available.

A local GP attended the recent Parish Council Meeting to raise concerns about potential gap in provision for new residents. There have been unprecedented numbers of new patients with 650 from 2018.

Healthcare will be challenging with GP books already full and it is difficult to gain appointments with other NHS services such as Dentistry.

## **4. Drainage and sewage**

Residents have provided numerous examples throughout the village of flooding (Please see Appendix B). The brook which runs through the village after moderate rainfall has sewerage deposited in it from a system that can't cope. Flooding has been seen in Gilbert's Lane,

Poolhouse, Planks Lane and Brickbridge Lane. The Council have surveyed pipes in Wombourne but deemed them too costly to replace.

No extra capacity has been made available in the sewerage system with new developments that have to date taken place. With additional households the brook flowing right through the village will take the overflow burden.

The Issue starts before Wombourne the Brook originates from Penn Common is joined by contributories from Bearnett Lane and Lloyd Hill water catchment from the A449 Stourbridge Road.

On the bridge by Wodehouse Farm sewage rises from a manhole cover on the pavement in moderate rain containing human waste and toiletries which end up in the Wom brook.

The sewerage system does not cope at present system and has to flow through the village to the Bridgnorth Road. Sewage is also leaked into the Wom brook during moderate rain fall at various points in the village. The proposed developments at Gilbert Lane and School Road will increase sewage levels in the system which will need to pass through to the other side of the village.

(Please see attachments of recent images of sewage in the Wom brook. Appendix A)

This will further endanger the population of water voles and other fauna and flora.

#### **5. Development in a designated conservation buffer zone and green belt land**

Development in these areas, however planners try to mitigate the risk, will threaten trees, wildlife and fundamentally change the look and feel of the entrance to Wombourne either from Gilbert's Lane or Billy Buns Lane. It will create pollution through additional cars and a reduction in the air quality reducing the overall wellbeing to residents. The area to the left of Gilbert's Lane is a designated a Conservation Buffer Zone but this appears to be of little consequence. No amount of sympathetic planning will improve the views of this aspect of the village which the zone is protecting.

All of the above would appear contrary to South Staffordshire's Climate Change Policy. A biodiversity nett gain can only happen if compensation is paid, the likelihood is this will be invested elsewhere in the county not in the Wombourne area therefore there is no bio-diversity nett gain, there will be a bio-diversity nett loss.

Link to Conservation Areas documents from South Staffordshire Council website. (Map shows conservation buffer zone to protect aspect of village)

[https://www.sstaffs.gov.uk/doc/172148/name/Wombourne\\_rs.pdf](https://www.sstaffs.gov.uk/doc/172148/name/Wombourne_rs.pdf)

<https://www.sstaffs.gov.uk/doc/172137/name/Wombourne%20Conservation%20Area%20Management%20Plan.pdf>

#### **6. Other locations**

The planning strategy is out of date and does not recognise major changes to working life and use of buildings which have emerged post Covid within the Black Country.

Andy Street, Mayor of the West Midlands has stated: "The fact is there are enough of these old brownfield sites in Walsall and the wider Black Country to ensure we don't have to build on the Green Belt between now and 2031."

<https://www.andystreet.org.uk/news/we-have-enough-brownfield-sites-black-country-protect-aldridge-green-belt>

Why does South Staffordshire have to take green belt land away for the Black Country and Birmingham when they themselves are just looking at brownfield site development and not using their own green belt?

There has been too much reliance on land owners bringing forward greenbelt land rather than active exploration of brownfield sites, an approach preferred by developers as it is a cheaper option for them. This is not a strategic approach with a starting point of what land is for sale because it is the route of least resistance.

An option for consideration would be look to expand some of the smaller villages and develop an infrastructure to sustain and grow them. By growing smaller settlements, increased demand could drive the opening of shops, options to provide public transport links and increased services such as doctor's surgeries. Currently, residents have to travel to large villages or towns for provisions. The building of convenience stores in areas away from current facilities could be a condition of build.

## **7. Loss of village identity**

Wombourne for many residents as part of this planning proposal will no longer be considered a village. The very essence of village life will be removed eg. access to green fields and farm. This will affect many people's well-being.

Many people enjoy the green belt. The appearance of the village will be destroyed if more housing is allowed to go ahead as you enter the village at Billy Buns Lane or Gilbert Lane. The green belt is a buffer zone between the village and the busy A449, Wolverhampton and the Black Country.

The area to the left of Gilberts lane is an allocated conservation buffer zone, for the conservation zone of the central village area. If housing is built here the view of the village will be diminished of which no amount of mitigation will appease.

The fact of living in a village environment provides a certain well-being to many of its residents. As well as existing residents, many moved into Wombourne for that reason. The appearance of the village will be destroyed particularly if developments around Gilbert lane and School road occur.

## **8. Proposed option 463**

Consists of;

- a. Smallbrook farm house, Cattle sheds, Stables and outbuildings.
- b. An arable field.
- c. Field for cattle grazing, and paddock.
- d. Horse paddock.

The proposal would see Smallbrook farm demolished for housing. Smallbrook farm house was built pre 1800 and was originally associated with nail production. It is now occupied by a tenant farmer, who is the second generation of a three generation lease of Smallbrook farm.

The proposal would see 25 acres removed from the tenancy out of a total of 90 acres (463 and 284), a 28% reduction, as well as loss of stables and cattle sheds.

The land opposite Smallbrook Farm is crossed by high voltage electricity lines which have recently been renewed. A large pylon is located in the paddock in front of the farm house with the wires running over the A449, across Smallbrook Lane over a section of the farm yard, over School Road and across the arable field crossing Billy Bunns Lane. It is understood that building restrictions apply and therefore how can this parcel of land be deemed suitable for building development?

The fields and paddocks are surrounded by historic hedgerow which can be seen on maps of the area in the 1800's. The area is a green buffer between the busy A449 and the village. As such it has been shown hedgerow and green spaces absorbing fumes and exhaust particulates which otherwise would blow into the village, this would have a detrimental effect on the health of the residents particularly those more susceptible with existing lung conditions.

Hedgerows are good at removing greenhouse gases through carbon storage. Any loss will contribute to environmental damage, no matter how much money a developer pays the council for bio-diversity mitigation.

The hedgerows are a wildlife corridor and habitat. A large variety of birds are regularly seen in these fields and hedgerow including a number of red and amber list species such as Bullfinch, House Sparrow, Linnet, Dunnock, Green Woodpecker, Kestrels, Mistle Thrush, Song Thrush and Yellowhammer. Also seen are species on their annual migration stopping to feed in the fields and hedgerows such as Wheatear and Ring Oozle.

The parcel of land also hosts a variety of insects and flora, this should be subjected to a study to understand what species will be lost in the green belt was removed.

Larger mammals are also present, such as foxes and at least one badger sett which runs down the side of School Road. A badger run can be seen crossing the fields and continuing up Pickles Hill. Muntjac deer have also been spotted.

An open brook (Small Brook) runs down the field the whole length of Smallbrook Lane. This supports much wildlife, insects, birds and mammals.

At the bottom of Smallbrook Lane, the brook enters pipework splits three ways to ease its entry into the Wom Brook.

1. Left along and under Gilbert lane along Battlefield Hill to emerge by the bridge and into the Wom Brook.
2. Right down Moises Hall Road and into the Wom Brook.
3. Right down the High street then through the back of the Civic Hall and into the Wom Brook.

Flooding occurs in Gilbert Lane, the pipework can't cope with the excessive amounts of water further upstream and adding to it will exacerbate the situation. (See Appendix B.)

## 9. Proposed option 284 - Arable field

The field is surrounded by historic hedgerow which can be seen on maps of the area in the 1800's. The area is a green buffer between the busy A449 and the village. As such it has been shown hedgerow and green spaces absorbing fumes and exhaust particulates which otherwise would blow into the village, this would have a detrimental effect on the health.

Hedgerows provide the same benefits as listed in points and benefit a similar set of wildlife. Replacement trees and bushes will not have the same variety of the hedges they replace and all the wildlife network and eco systems will not move from one to the other it will be destroyed.

All of the above would appear contrary to South Staffordshire's Climate Change Policy. A biodiversity nett gain can only happen if compensation is paid, the likelihood is this will be invested elsewhere in the county not in the Wombourne area therefore there is no bio-diversity nett gain, there will be a bio-diversity nett loss.

The area of 284 is a designated a Conservation Buffer Zone, this has appeared to be ignored in the selection of preferred land options.

Link to Conservation Areas documents from South Staffordshire Council website. (Map shows conservation buffer zone to protect aspect of village)

[https://www.sstaffs.gov.uk/doc/172148/name/Wombourne\\_rs.pdf](https://www.sstaffs.gov.uk/doc/172148/name/Wombourne_rs.pdf)

<https://www.sstaffs.gov.uk/doc/172137/name/Wombourne%20Conservation%20Area%20Management%20Plan.pdf>

### **Wombourne Conservation Area Management Plan**

"3.3.3 ACTION: The Council will seek to ensure that development within the buffer zones preserves or enhances the special interest of the conservation area and causes no harm to that special interest."

"3.3.4 ACTION: The Council will also seek to ensure that these views remain protected from inappropriate forms of development and that due regard is paid to them in the formulation of public realm works or enhancement schemes."

No amount of mitigation of any housing stock in this field will preserve or enhance the special interest of the conservation area, it will only harm it.

Running along the southern edge of the field is the Wom Brook. The Wom Brook was declared a Local Nature Reserve in 2008 and has been awarded a number of Green Flag awards from 2009. The brook corridor supports a large diversity of woodland trees and plants, aquatic margin species and birds, insects and mammals.

There are increased sightings of Kingfisher, Heron and Little Egrets along the Wom Brook indicating levels of fish, insects and invertebrates have increased to support larger animals. There is a real danger the eco-system balance could be changed with environmental consequences. It is likely development on this field will increase run off into the Wom Brook an affect water levels even with the use of holding and balancing ponds. Water quality will also decline if the sewerage system through the village is not improved. This could also

affect a population of Water Voles in serious national decline is present along the Wom Brook. Water Voles are a schedule 5 protected species since 1998 and recognised in the Staffordshire Biodiversity Plan.

A full independent Environmental Impact Assessment is required to understand what other species are present and what impact any development will have to the Wom Brook.

In conclusion, we object to the proposed preferred options within the Local Plan Review 285, 459, 415, 562, 416 and particularly 463 and 284. This is green belt land, expansion of Wombourne without investment in infrastructure and services will increase traffic, pollution and environmental damage. No investment in new health service provision, no expansion of drainage and sewerage system, development in a designated conservation buffer zone and green belt land, inadequate exploration of brownfield sites and loss of village identity will have a detrimental impact on Wombourne.

The Consultation are based around a lack of strategic planning and the land identified 463 and 284 should remain in the Green Belt. This Consultation has exposed a Planning Department that is meeting the challenge of the identification of sites through an ad hoc approach of self-referral of landowners. This has culminated in a preferred option that will devastate the Green Belt in Wombourne and will fail the local population environmentally. It is understood that there is land identified in Gailey that has been put forward that would meet the whole housing need of Staffordshire.

Should you wish to discuss further any points raised in this letter please do not hesitate to contact us.

Yours sincerely,

Michael and Hannah Lewis



**Appendix A** - Images of sewage waste in the Wom Brook after a heavy rain. (taken by [twitter.com/WombourneNature](https://twitter.com/WombourneNature))







**Appendix B – Facebook posts of flooding in Wombourne.**

