

	<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 Details*

**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.*

2. Agent's Details (if applicable)

Title	Mr	
First Name	John	
Last Name	Marsh	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	██████████	
Line 2	██████████	
Line 3		
Line 4		
Post Code	██████████	
Telephone Number	██████████	
E-mail Address (where relevant)	████████████████████	



Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

5. 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.

5.19 Following the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation, the council proposed a number of changes to its preferred spatial strategy to inform the 2021 Preferred Options consultation. It reflected responses to the 2019 consultation and the results of the site assessment process to arrive at the exact level of growth given to each area of the district. In summary, key changes made were:

- Increasing growth proposed North of Penkridge to better reflect the findings of the GBBCHMA Strategic Growth Study and non-Green Belt land available north of the village;*
- Allowing for further limited growth at Cheslyn Hay/Great Wyrley beyond the existing allocated/safeguarded land, recognising the area’s Tier 1 settlement status, but balancing this against the lack of a strategic recommendation for these villages in the GBBCHMA Strategic Growth Study and the site specific constraints affecting land in the area;*
- Limiting new allocations at Perton to the existing safeguarded land, reflecting the lack of a finalised junction improvement scheme at the A41 and the remoteness of Green Belt site options from education facilities;*
- Reducing the amount of growth allocated to the western edge of the Black Country, reflecting the relatively limited unmet need arising from Dudley Metropolitan Borough, which also holds significant Green Belt site options in this area within its own administrative boundary as set out in the GBBCHMA Strategic Growth Study;*
- Removing the proposal to identify small site allocations in Tier 4 villages, as current monitoring information suggests these allocations are not required to meet the national requirement for 10% of housing growth to be delivered on sites of less than 1*



hectare; • *Identifying villages, namely Brewood and Great Wyrley, where specialist elderly housing allocations may address existing imbalances between local needs and supply*

In respect of Wombourne this section is not complied with

There is not a single mention of Wombourne in this list to justify why a tier 2 settlement is getting 500+ houses when the next highest is 400, in a tier 1 settlement, and no additional infrastructure is proposed to either justify this level of additional housing not bringing Wombourne up to a tier 1 settlement to reflect this level of housing. This approach ruins Wombourne as a village but also gives it none of the benefits of being a town.

There is no explanation or justification as to why Wombourne, according to the table below this section, is to account for 8% of the housing need, when the next highest Tier 2 gets just 3.7. Huntington is classed as a tier 2 village, yet is right by Cannock and therefore has access to Cannocks rail network, making it a de-facto tier 1, yet it is getting just 39 houses. And their councillor voted for the plan.

6. 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.

- 1) Redistribute 250 of the additional homes to wards whose councillors voted for the adoption of the plan, not against.
- 2) Add a proper infrastructure delivery plan to Wombourne BEFORE a single house is built.
- 3) To add a democratic vote of residents before approving any green belt site for development
- 4) To delay the local plan until the duty to co-operate issue is resolved, i.e it is being abolished, and how can we co operate with neighbours who have scrapped their own plans
- 5) To delay the local plan until the passing of the Levelling Up Bill currently going through parliament, which amongst other things adds a duty to adopt an infrastructure first approach to development. This plan asserts that 500+ homes can be added to Wombourne, the largest of any area despite being a tier 2 village. No Tier 1 village has such a large contribution, yet by its own definition a Tier 2 village does not have the resources and accessibility of a tier 1 village. There is not a single road, doctor, nurse, teacher or police officer accounted for in this plan to service the needs of a population that already cannot access services, already has congestion issue, has no rail station, no road connection to a major transit route, and has no large employment base which would negate the need to commute to/from the area in order to be able to afford to live there.

(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.

7. 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.

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

The consultation process has been deliberately frustrated by the planners in order to discourage and disengage with residents who dissent from this plan. Despite thousands of objections from residents our voices have not been heard.

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