

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p>  <p><b>(For official use only)</b></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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="John"/>	<input type="text"/>
Last Name	<input type="text" value="Marsh"/>	<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" value="██████████"/>	<input type="text"/>
Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="████████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="██████████████████"/>	<input type="text"/>



## 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.

*Wombourne 5.46 Housing growth in this area will be increased through the delivery of new housing allocations around Wombourne, which will be brought forward alongside the existing allocated and safeguarded housing sites dispersed around the village. Recognising that previously developed land adjacent to the village is either unsuitable or unavailable, significant Green Belt release has been focused on the north-east of the village. This recognises this location's good proximity to a variety of services and facilities, including regular public transport, as well as its relatively low Green Belt harm compared to other areas in the district.*

In respect of Wombourne this section is completely unsound and in fact blatantly untrue.

The significant green belt release has NOT been focussed on the north east of the village, it can be seen from the map that 223 dwellings are in the north east section (Billy Buns/Gilebrt Lane) and 223 dwellings on the north west (Pool House sites). The planning department will argue that the Poolhouse sites were 'removed from the green belt in 2018, which is a complete farce as the consultation for this in 2018 was non existent, was not advertised anywhere and has come as complete news to the entire village. This should be considered as an abuse of the process as it has been done completely against the wishes of the residents and practically without their knowledge, and represents bad faith on the planning dept's part, as they have sidestepped the need to 'avoid building on green belt land' by stealthily 'removing' the green belt from the green belt!

Secondly, the locations 'good proximity to a variety of services and facilities, including regular public transport.' This is an outright lie. There is no train station in Wombourne. The nearest train station is Coseley train station, which is 20-25 minutes away by car. Around a third of trains do not stop at Coseley and the service is roughly twice per hour, Birmingham in one direction and Wolverhampton in



the other. There are just two bus routes in Wombourne, the number 15 and the number 16, which will get you between Wolverhampton and the Merry Hill Centre. No research has been done as to how many residents are using these two bus services to commute to and from work. I would suggest that this is a simple task that the planners have not bothered to do, it could be done by a simple survey at rush hour.

The cheapest house for sale in Wombourne is currently £205,000, the average is £285,000. Taking an estimate based on a mortgage of 4 times salary with a 10% deposit, this would require a salary of £46,000 for the cheapest house in the village, or £64,125. I challenge anyone from the planning department to survey the bus stops in Wombourne and find anyone commuting by bus to their job which attracts this kind of salary at the Merry Hill Centre or Wlverhampton City Centre. To be absolutely frank this bus service exists to service the needs of the elderly population, it is ludicrous to suggest it is a well-used commuting method.

As anyone who lives in Wombourne can tell you, it's a village of commuters. You can see this every morning when almost every household gets up, gets in their car and starts clogging up the routes out of the village (notably...BILLY BUNS LANE!!!) This is because the village is not connected to any major mass transit route. In commuting traffic, the M6 motorway is around 30 minutes drive away, the M5 motorway is around 30 minutes drive away, the Black Country Route is 20 minutes drive away, the nearest trains station as mentioned above is 20 minutes drive away. The bus station in Stourbridge is 40 minutes away (Wombourne to Stourbridge is a notoriously painfully congested route). The nearest tram station is around 30 minutes away. These numbers are on an uninterrupted journey. All of these routes, unless one travels north towards Wolverhampton, are single carriageway roads, constantly being resurfaced, mainly due to flooding/lack of drainage, another issue that will be made worse when they build on our fields. A set of traffic lights on these roads causes absolute chaos. The planning departments assertion that the village has good public transport and is well connected is absolute nonsense and can be dismissed by simply coming to the village.

The assertion that it has proximity to a variety of services is also utter nonsense. By way of example, Wombourne has a current population of 13500. The amount of houses being built as well as normal population increase would bring the population up to around 16000. For this population, which South Staffs planning rates as having 'good services' and requires no additional infrastructure, we have 5 schools and 2 GP surgeries. Penzance in Cornwall, with a population of 16000, has at least 10 schools, 5 doctors surgeries, a minor hospital and a permanent police facility.

South Staffs Planning clearly think they can brush aside enormous issues with their plan by writing a vague sentence which appears to 'deal' with the issues raised, but it does nothing of the sort. For instance this line "*Recognising that previously developed land adjacent to the village is either unsuitable or unavailable, significant Green Belt release has been focused on the north-east of the village.*" How is that evidence for the residents that absolutely every Brownfield site was explored to the absolute Nth degree, it is just a sentence that means nothing, meant to absolve SS planning from any responsibility for destroying the green belt. For instance, we were told during the woeful online consultation in December 2021 that the CoPart site was not suitable as there would be a traffic issue if a junction was placed there. But a LIDL has been approved literally opposite the Co Part site. The Pool House Road sites are probably 100m from CoPart, on a smaller road, yet no traffic issue identified? Will the new residents cars teleport in and out of the village?

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) Add a proper infrastructure delivery plan to Wombourne BEFORE a single house is built, to include, new schools, new doctors surgeries and an NHS commitment to staff them, a road network plan available for residents and the highways agencies to critique prior to implementation, a permanent police station. Public electric car charging points (there are none currently)
- 2) To add a democratic vote of residents before approving any green belt site for development
- 3) To delay the local plan until the duty to co-operate issue is resolved, i.e is it being abolished, and how can we co operate with neighbours who have scrapped their own plans
- 4) 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.

- 5) Reduce Wombourne's contribution to below 100 houses and place them on brownfield sites. The 'exceptional circumstances' necessary to justify destroying green belt land does not include the failure of SS planning dept to effectively identify and secure brownfield site.

(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:

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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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX