

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
---	--	---

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="text"/>	No	<input type="text" value="X"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.

In respect of Wombourne the plans are unsound.

There is not a single improvement to infrastructure to support the addition of 500 houses to Wombourne. This includes, but is not limited to:

-Road infrastructure on Poolhouse Road. How will additional entrances junctions add to the build of traffic on this road? How will they affect the traffic at the choke point at the junction of Pool House Road and Bridgnorth Road. When and how was the current traffic build up at key times measured at this junction? How will they affect traffic at the lights over the bridge at the Round Oak? When and how was the current traffic build up at key times measured at this junction?

-Road infrastructure in/around Billy Bunns Lane. . How will additional entrances junctions add to the build of traffic on this road? How will they affect the traffic at the choke point at the junction of Billy Bunns Lane/Smallbrook Road/Stourbridge Road?. When and how was the current traffic build up at key times measured at this junction? How will they affect traffic at the lights over the bridge at the Round Oak? When and how was the current traffic build up at key times measured at this junction?

-GP Facilities- How will existing surgeries cope with an addition of approx. 1200 people? What additional resources are available to the existing GP's? Why have no additional GP surgeries been included in the plan? What is the planning departments understanding of the current wait times for NHS patients in Wombourne?

-School places- Wombourne has several schools, including two primary schools and the lone secondary school on the same road (technically School Road and Ounsdale Road, but it's the main road through



the residential part of the village). How will these schools cope with the additional childrens spaces required? Have they been consulted at all? What will this do to class sizes in Wombourne? What additional teaching staff have been funded to cope? Is it reasonable to expect an aspirational area with a high council tax yield to suffer the same overcrowding in classrooms as inner city schools? Or is it a race to the bottom?

-Emergency Service Access- Wombourne has no hospital, with both Russells Hall Hospital and New Cross Hospital a significant drive away. What assessments have been done as to the impact 500 houses and the additional traffic on the roads will have on both Ambulance wait times to the village and Ambulance journey times to A+E? Especially considering an ageing population frequently referred to in the plan.

-Police Presence- Wombourne only has a permanent police base for its small neighbourhood team, due to an office set aside in the Wombourne Civic Centre. A population increase of approx. 1200 people will naturally attract more crime, especially on new build estates which suffer much higher crime. No consultation was done with Staffordshire Police, I asked this during the online consultation and was met with a condescending response of 'Staffordshire Police haven't contacted us to object.'- why would they if they haven't been approached!!! Wombourne also suffers a high amount of cross border crime from West Mids, notably vehicle crime. None of this is even considered in the plan.

Train Links and Public Transport- Wombourne has no train station, with the nearest train station being Coseley, around 20-25 minutes drive away, longer during commute times. It has two bus routes, servicing only Wolverhampton and Merry Hill/Stourbridge. There is a significant drive until any of the main arterial routes can be driven to, such as the M6, the Black Country Route, or the M5.

Wombourne has a current population of 13500. The number 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.

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:

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