

	<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="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.

EC12: Sustainable transport The council will work proactively with partners to promote sustainable transport measures and deliver high quality transport infrastructure and links across the district. This includes opportunities to improve bus and rail services and connections including making provision from increased demand from new development within the district.

In respect of Wombourne the plans are unsound.

None of the above applies to Wombourne, there are no improvements to bus services and there is no rail service. There are no links across the district, Wombournes two bus routes will only take you to Wolverhampton and Merry Hill/Stourbridge, both of which are in the West Midlands.

All new developments will be required to demonstrate all of the following: a) Designed to maximise opportunities for walking, cycling and the use of public transport, ensure the safe movement of vehicles and minimise the impact of parked and moving vehicles on residents, business and the environment. Developments should adhere to the standards set out within LTN 120 or subsequent additions.

There is not a single improvement to infrastructure to support the addition of 500 houses to Wombourne.

-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?

b) Safe access and an acceptable degree of impact on the local highway network.

Same comments as above

c) Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey. Travel routes should link into existing travel networks beyond the development site where possible. The long-term management of the public realm including transport infrastructure must be ensured.

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.

There is no 'travel choice' for the residents of Wombourne, which is well known as a commuters village. You would know this if the planning officers had actually bothered to learn about Wombourne before trying to destroy it. You can see this every morning when everyone of working age gets in their cars to go to work. The entrances and exits to the village choke up with traffic during rush hours as it is. If for instance, you work in Birmingham, you have to drive through Wombourne, adding to its traffic, cross the roundabout onto Wodehouse Lane, which is single carriageway all the way to Sedgley. Cross through Sedgeleys town centre, which is congested, then through Woodsetton, again single carriageway, then cross the Birmingham New Road, a busy main arterial route, to get to Coseley train station. This journey is 20-25 minutes in clear traffic, due to the amount of stopping at junctions and traffic lights, and Sedgley's town centre. Coseley station has around 3 trains an hour, one of which passes through without stopping. This will take you to Birmingham New Street where you again have to change trains to get to anywhere else.

d) Protection of existing rights of way, cycling and equestrian routes (including both designated and non-designated routes and, where there is evidence of regular public usage, informal provision). If it is demonstrated that the loss of such as route is unavoidable, the development should provide suitable, more appealing or at least equal replacement routes.

Wombourne has several well-loved walking routes, many of which include the fields by Billy Buns Lane, which leads to Ladywell Woods. This will be destroyed by the plan. Access is via a gate on Billy Bunns Lane. This leads up to fields with horses and cows, which are well loved by the local children. The planners do not care about this, only meeting their made up housing target.

e) Adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions.

500 houses means around 1000 extra cars. This will obviously add to noise pollution, light pollution (through additional street lighting which is not currently required but would be on the roads due to have sites attached to them) and air pollution. No air pollution survey has been conducted in any form as far as I am aware, and when I asked about it at the previous consultation I did not get a straight answer. In addition, it has not been stated where the waste from these 500 houses will be processed, it must be assumed the waste management site on the Heath Mill estate. This estate created a powerful odour in summer months as it is, no assessment has been put forward as far as I am aware as to the impact the additional houses and their waste will have. Finally, the recycling centre will not operate with such a large population increase.



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.
- 6) Conduct actual air quality surveys, noise and light pollution surveys, traffic surveys and demonstrate to local people how this is meant to be beneficial to them

(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