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Tel No: [REDACTED]

14th December 2022

Dear Sir/Madam

South Staffordshire District Council – Local Plan Review

In December last year, we submitted a detailed response to the District Council objecting to the use of fields identified as 463 and 284 which had been identified in the new Local Plan for new housing development. Sadly we never received a reply from the District Council answering our concerns, which we found puzzling and disappointing as we understood the exercise to be on the basis of consultation.

Our purpose in submitting this objection in the latest consultation period (11th November to the 23rd December 2022) is to challenge the ‘soundness’ of the Plan, alongside the specific use of fields 463 and 284.

Our understanding of the reasons for challenging the ‘soundness’ of the Local Plan are based on the following :-

- Positively prepared (based on a strategy that seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development);
- Justified (the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence);
- Effective (the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities);

- Consistent with national policy (the plan should enable the delivery of sustainable development in accordance with the policies in the Framework)

1.0 'Positively Prepared'

1.1 In the forward to the Publication Plan it states 'we know that our residents care about the communities in which they live and want to help shape our villages for future generations'. Yes we acknowledge this statement. It is why so many formal objections were submitted by Wombourne residents and the Parish Council. The overwhelming view was that the imposition of the proposed new housing sites was that they would destroy the character of this beautiful village and impose major problems for future generations living in the village.

1.2 The statement in the forward to the Publication Plan is we believe incorrect, i.e. 'Members have driven the development of the new Local Plan for South Staffordshire'. We are sure that the vast majority of Members do not want this Local Plan, the reality is that Central Government has imposed the requirement and Members have had to comply.

1.3 In the forward to the Publication Plan, it states 'that your views have helped us set out a strategy'. Presumably this sentence is directed at existing residents of South Staffordshire. The statement is incorrect, as the only formal consultation document that was considered by individual residents, was the emerging Local Plan, with only a relatively short consultation period for residents to consider and comment. Nothing previously had been issued to local residents about the imminence of such major planning policy changes, so it was a shock and surprise to receive such news, albeit by word of mouth, as there had been no formal direct communication from the South Staffordshire District Council to individual householders.

1.4 A strategy that seeks to meet objectively assessed development and infrastructure requirements

1.5 The forward states 'the South Staffordshire Local Plan is based on robust planning evidence with infrastructure at its heart'. This is not the case as there are some serious omissions in evidence which point to the inadequacy of the document in being 'positively prepared'.

1.6 Firstly there is no published information on whether area health authorities were consulted at strategic level on the imposition of such housing numbers and the demographics of the projected population over the plan period. An example being the need or otherwise for increased hospital capacity or health centres to be built over the plan period. If so, where will they be built, or will residents still have to utilise the current inadequate hospital provision in Wolverhampton and Dudley, where expansion of current facilities is practically doubtful. If there is need for increased capacity, how and where will this be provided. In the projected Local Plan there is no provision for this vital infrastructure.

1.7 Secondly there is no published information on whether the County Council's Social Services Department was consulted on the Plan. Obvious questions should have been asked about the imposition of an increased population on existing facilities/services and whether for instance, new sites would be required to accommodate the needs of an ageing population, e.g. residential homes etc. Surely forward estimates from the Department would inform the planning authority of the requirements both in terms of numbers and localities. There is no evidence to support planning strategy in this key area where an increasingly older age population is going to put significant pressure on Social Services and the Area Health Authorities.

1.8 Thirdly, there is no information on whether the County Council's Education Authority, the Government's Education Department and individual local schools were consulted on the overall requirements for pupil provision over the plan period. Again an obvious question to a local school would be whether their existing buildings were fit for purpose to meet an increasing population in their district and if not where could new school facilities be built, without using the school's existing recreational space. In a proper strategic plan where forward

pressures could be anticipated then suitable sites should be identified as part of the Plan.

1.9 Fourthly, there is no evidence of consultation with the Highways Authority relating to the effects that traffic generated by new housing sites will have on existing settlements. New housing developments bring their own pressures on existing surrounding highways, and the unfortunate almost casual phrase 'should be ok' in the review document only relates to new traffic junctions from new sites onto the existing road systems. As part of the Local Plan Review the Highways Authority should have been asked for a 'Traffic Impact Assessment' on settlements. For instance Wombourne is a village that has developed over many years, but still uses roads in the central areas that are based on cart tracks from previous centuries. The roads are narrow and are not fit for modern purpose. In considering the viability of the parcels of land for new housing development, a 'Traffic Impact Assessment' on the village would have realised increased traffic due to increases in shopping in the central area, new residents going to places of work, visiting social and recreational facilities, and amongst other pressures, the 'school run' effect, which even now with the existing schools creates chronic congestion through the village involving large numbers of parents taking children of all ages to school in a morning and collecting them in an afternoon. Adding hundreds of new dwellings from these new sites will exacerbate the problem to such an extent that highway safety will be further compromised, and schools will have to employ additional arrangements to safeguard children waiting for their parents to arrive. In terms of the new sites in Wombourne, for instance there is a statement that they are close to education. If this is supposed to be an advantage, then we suggest it is misplaced. If parents do manage to get their primary age children into St Benedicts as an example, they will be fortunate as currently we understand that due to the constraints on the school, it is only possible to admit a small number of new children per year. If this is the case, it will mean that a large number of parents with primary school age children will need to commute on a daily basis to other schools, either in the village, or the Stourbridge area or Wolverhampton. For children from 11 onwards, the only senior school in the village is Wombourne High School situated in Ounsdale Road, which will mean a

significant increase in parents driving through the already congested roads at school time to drop and collect their children. It appears from the Highways Authority individual site comments, that no regard for this school commuting reality has been assessed. The Authority has merely commented on the traffic situation for each parcel of land. If the new developments are allowed, it will be necessary to significantly improve road access through the village, including the provision of new cycle ways and footpaths. Frankly we cannot see how this can be done and the 'carrot' of financial contributions will have to be significant to pay for the necessary highway improvements, including costs of acquisition of land throughout the centre of the village to accommodate the improvements.

1.10 Setting out a strategy

1.11 As far as 'setting out a strategy', the focus in the emerging Local Plan was site specific, so the Local Plan cannot be called a strategy because it is deficient in a number of areas.

1.12 We are not sure if a consultation document was issued by the Council to existing residents that offered the opportunity for comment on developing a long term strategic aim for the district. If there was such a document prepared and issued, I would suggest that the majority of residents had no such knowledge. The District Council will probably say that such information was available through the Council's website, but it is not something that residents would naturally look for. Furthermore if the information was displayed on the website, it would have been difficult to find due to the plethora of documents and lack of poor signage.

1.13 As far 'positively prepared', we know that from the Wombourne area, over 400 objections were submitted, including a strong detailed objection from the Parish Council. In fact all 12 Wombourne Parish Councillors objected to the emerging plan at the Special Council of South Staffordshire District Council in November 2022.

1.14 Nowhere in the Publication Plan is there reference to the numbers of objections raised, both in terms of the so called 'strategy' and individual sites. If the new Plan has been 'positively prepared' surely the Inspector should be made

aware of all objections, and what regard the District Council had to these objections. The fact that objections have not been referenced in the document will give the Inspector the wrong message. We believe the Local Plan has been 'negatively prepared' because of the huge opposition from local residents to the planned sites.

1.15 Consultation – *'the act of exchanging information and opinions about something in order to reach a better understanding of it or to make a decision, or a meeting for this purpose'* A further issue is that in preparing our original objections to certain sites, which took many hours to do, without recourse to a planning consultant, we have still not received a reply from the District Council explaining why it has not accepted or rejected our observations. So much for so-called consultation.

1.16 In summary the Local Plan had not been 'positively prepared' because of the lack of and poor quality of consultation by the District Council, the failure to set out a complete strategy for all significant influences that have a bearing on the future of a district and no reference in the Publication Plan about the number of objections and the grounds for objection to the Local Plan. It is apparent that the lack of strategic consultation with the major stakeholders set out above, means that decisions are being left to piece-meal negotiation with developers and land owners of individual sites, without reference to over-arching needs, and no published formulas for financial/provisional contributions (apart from the formula for affordable housing) .

1.17 The Local Plan is therefore not fit for purpose, as it lacks a full robust evidence base and is incomplete in its strategic planning approach.

2.0 'Justified'

2.1 The basic premise of the Local Plan is to provide new housing sites to meet the local housing need and also the housing need from the Black Country. This premise cannot be justified as there are no controls spelt out in the Local Plan to ensure that the private and affordable dwellings go to meet the local and Black Country needs. In its present format with no controls, the Local Plan allows for

‘open market’ use of these sites, thus allowing people from adjacent Counties or from anywhere in the Country to buy or rent the new properties . So the justification for the Local Plan, i.e. to meet local housing and Black Country needs has been misrepresented, and accordingly the Plan must withdrawn because it is ‘not fit for its stated purpose’.

2.2 As can be seen from the table below Wombourne is listed as a Tier 2 village. It is obvious from the projected numbers that Wombourne is by far scheduled to take the largest number of new dwellings in the list of Tier 2 villages. As far as we can see there is no justification set out in the Local Plan for Wombourne to receive such a loading in comparison to the other Tier 2 villages. If there is no justification, then the distribution of new dwellings, if proven to be required, should be shared equally between all 5 villages.

Tier 2 villages	16.5%	723	614	310
Wombourne	8.0 %	300	280	245
Brewood	1.8 %	77	63	43
Kinver	2.6 %	136	82	44
Perton	3.7 %	226	150	0
Huntington	0.5 %	9	39	0

2.3 The obvious conclusion is that Wombourne’s allocation has been determined by site availability rather than through a proper strategic planning approach and justification of local housing need.

2.4 The Local Plan does not set out the justification for the housing numbers from the Black Country Partnership. It also does not identify the demographic profile of the population involved which would have an impact on location of sites. Furthermore there are no details of the available and projected number of housing sites within the Black Country Partnership (that should be set out in their respective Local Plans), justifying that there is a shortfall of sites to meet their requirements.

2.5 The Local Plan does not plan for any changes that might occur in the overall housing numbers during the plan period, which means that sites could be allocated without justification. For example, Dudley Metropolitan Council has recently withdrawn from the Black Country Partnership, meaning that its estimate

of housing numbers must now be removed from the overall projected housing requirements for the South Staffordshire District. In this regard there must also be re-examination of the requirements for the sites directly surrounding Wombourne, as it can be reasonably surmised that displaced residents from Dudley would naturally want to live in the southern area of the district as opposed to the northern area, because of the proximity of Dudley to the area.

2.6 There is no breakdown of housing need relating to individual areas throughout the overall district, where the likely pressures for housing over the Plan period may occur. It may well be that the predominance of need will fall on the northern part of the district (especially as Dudley has severed its partnership with the Black Country), thus creating a situation where there is a lack of sites in the north, with an undue amount of sites in the south. This lack of important evidence means that the Local Plan has not been developed strategically, but merely led by likely site availability.

2.7 There is a recognition in the Local Plan that there is a need for and emphasis that new housing expansion in the future should occur in four major areas, because of their proximity to major transport routes (main line railways, the A5 and three motorways) and significant centres of industrial and commercial growth. Unfortunately it is apparent that there is a reluctance to advance these areas within the plan period, so settlements like Wombourne will be taking the increased growth requirements. The strong impression is that they are easy places to deliver the targets, despite the obvious huge disadvantages to the existing settlement and its residents. It appears that the strategic thinking is based on ease of delivery rather than taking the proper strategic approach. Such planning strategy cannot be justified.

2.8 As for the statement in the forward of the Publication Plan ‘providing affordable homes and jobs and will bring about new or improved local services and facilities and public open spaces’, we cannot see where such improvements can be delivered in Wombourne. The Local Plan does not justify this statement with any evidence for Wombourne or the other settlements in the locations near the housing sites. What new or improved local services will be provided? What is

the definition of facilities in a planning context, this is not set out in the Plan? What new facilities are identified? Where will new public open spaces be provided (they are certainly not identified in the Local Plan), who will pay for their acquisition and long term management and maintenance? And if new or improved services and facilities and public open spaces are required, where are the formulas for determining the developers' financial contributions in terms of upfront capital costs and the long term revenue support costs?

2.9 If there is no evidence of required improvements at the Local Plan stage, and reliance is put on individual negotiation at the planning application stage, it can be expected that developers/land owners will argue they do not have to pay anything towards such improvements. And finally if it is left to the planning application stage to identify the so called required improvements, who is going to research this information and evidence it? Will it be the District Council's planning officials, or is there an expectation that the Parish Council will do this? When planning applications are submitted there are short timescales in which to determine these matters, with the obvious possibility that identifying such improvements will be not be fully researched and not properly costed. The Local Plan does not set out which local authority will hold any financial contributions received, will it be the District Council or the Parish Council and how will the finance be managed? The Plan does not specify that financial contributions will be held only for local use. So if the District Council is the holder of the finance, it could be used for improvements across other areas of the District Council without any advantage to the local area!

2.10 In our experience large scale development has always been guided by an overall strategic plan, recognising the inter-relationship between housing, employment, health facilities, education provision, recreation, shopping, etc. Unfortunately the Local Plan site proposals for developing housing around Wombourne and other villages bear no such inter-relationship. It is apparent that the so called 'strategic planning' is the piece-meal availability of parcels of land where owners have indicated a willingness to sell. For example the proposed housing development for the fields identified as 463 and 284 will have no employment base or any large scale shopping/supermarkets nearby, in order to

serve the needs of over 200 new households. They will have to commute on a daily basis to work and shop in such places as Wolverhampton or Stourbridge etc. The nearest large scale employment centre and a large supermarket are on the southwest side of Wombourne which will necessitate journeys through the village or driving along the A449 to Himley and then the Bridgnorth Road.

2.11 The National Planning Policy Framework (NPPF) clearly identifies openness as an 'essential characteristic' of Green Belt, rather than a function or purpose. Openness is therefore seen as a key element in the assessment of all Green Belt purposes. Land that lacks openness will play less of a role in preventing sprawl, separating towns, preventing countryside encroachment or providing a setting to a historic town. Our contention is that in identifying 463 and 284 for housing development, the Planning Authority has taken little or no regard of the guidance given in the NPPF regarding 'openness'. A full description of the fields and their characteristics is set out in Appendix A to this submission. Quite clearly 463 and 284, due to their physical features and location, prevent urban sprawl, separate Wombourne from Wolverhampton, prevent countryside encroachment, and positively provide a wonderful landscape setting to the historic village of Wombourne. Furthermore in terms of their 'openness' the fields are not 'infill sites'. They are surrounded on three sides by open countryside, and the remaining side is separated from the main village by a country road.

2.12 The NPPF also states that Local Plans must seek to preserve/enhance landscape elements which contribute to the setting of historic settlements and views which provide an appreciation of historic setting and special character. Quite clearly, the planned use of 463 and 284 'flies in the face' of the NPPF guidance. New housing on these beautiful fields will not preserve or enhance the landscape, but do exactly the opposite. 200+ houses will forever destroy that landscape. There is no justification set out in the Plan for the use of these particular fields except that they are readily available for development. To sacrifice their importance to the enjoyment of local residents and future generations has no justification in terms of the principles set out in the NPPF.

2.13 The NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should 'set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'. The Local Plan does not specify ways in which the impact of removing the 463 and 284 'can be offset'. From observation it is difficult to imagine how this can be done, what ways can be introduced to replicate the wonderful landscape that the sites provide, the environmental qualities, the rich biodiversity of the fields, the farming use, the recreational use of the fields etc?. There is no justification as offsetting would be impractical, insufficient and beyond replication in the context of their current use.

2.14 If there is an assessed housing need specifically in the Wombourne area, which as previously set out in my comments has not been evidenced in the Local Plan, then other sites should be considered rather than 463 and 284 which form the most open attractive countryside gateway to the village. Again the identification of this important area of land can only have been made, because the landowner is a willing seller, and this makes it easy for the District Council to achieve its targets.

2.15 Much better alternatives exist in the area, but we suspect that landowners are not so willing to sell, or land may not come forward in the early part of the Local Plan, e.g. as mentioned in the Local Plan 'There is an area of brownfield land adjacent to the south-western edge of Wombourne, which is mainly occupied by the car storage company Copart. This site has been assessed as an option for housing, however it is not proposed for allocation due to uncertainty over the relocation of the existing business.' The implication is that this would be suitable for housing, but there is no obvious evidence in the Local Plan that attempts have been made to look at relocation throughout the District, or within the Black Country areas, where existing brown field sites are available. Using this site would in my opinion obviate the need for 463 and 284 (which are the most contentious sites for local residents) and the other sites allocated to Wombourne.

3.0 'Effective'

3.1 The Local Plan is only deliverable over the period because the Planning Authority has avoided using a full strategic planning approach to developing the Plan. It is apparent that decisions have been made on 'easy wins' where land owners are willing to sell within the plan period. In following the 'easy win' approach, outstanding fields such as 463 and 284 are being sacrificed. Long term options in better locations and allocation of brownfield sites are not being pursued because they may take longer to develop within the plan period.

3.2 The proper consideration of major factors like health, social services, education and transport have received little or no consideration because in my view if these matters had been properly considered, they would have slowed down the development of the Plan. This approach is appalling because effectively the District Council is 'washing its hands' of these responsibilities.

3.3 The Plan shows little information on effective joint working on cross-boundary strategic priorities:-

- No detail on changing demographics in order to assess the make-up of need e.g. will demand come from low income families requiring dedicated affordable housing sites, or will there be a need for increased affordable housing provision on cross tenure sites?
- No detail on where housing demand from the different authorities is likely to fall within the district, e.g. with Dudley Metropolitan Council withdrawing from the partnership, what demand for the southern part of the district is still required?
- No detail on cross-boundary strategic health priorities and needs, e.g. with an increase in the population over the plan period what effects will that have on existing health facilities and services, and what additional requirements will be needed?
- No detail on cross-boundary social services/welfare priorities and needs from an increasingly older population and again no information on

demographics, just an assumption that a proportion of new housing must be bungalows, but what about the needs of the older people living in them.

- No detail on cross-boundary highway impact appraisals, e.g. increased traffic on existing roads across the authorities, pedestrian safety, new cycle routes etc
- No detail on cross-boundary education requirements, e.g what increased pupil pressures, requirements for new schools, or expanding schools etc.

4.0 'Consistent with national policy'

'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;'

4.1 Comment – The wider context - As previously set out in this paper the Local Plan fails to promote a sustainable pattern of development because of the exclusion of major planning influences that would affect the district as a whole and on individual areas within the district. It is primarily focused on housing developments, where sites in isolation can be developed without regard to their effect on existing and future local services, infrastructure, existing highway considerations, health and social welfare provision etc. The Plan does not detail any of these important considerations.

4.2 Individual comment -The housing sites designated for fields 463 and 284 adjacent to Wombourne will forever detract from improving the local environment and in terms of climate change, no amount of mitigation will address these matters.

- a) *'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would*

significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’.

4.3 Comment- The Local Plan has not been objectively assessed in terms of housing need and other uses. A district wide number of housing need has been produced, but there is no evidence showing the need at local settlement level. So the decision on sites has been made on land availability, i.e. landowners willing to sell, as opposed to a proper needs led approach. There are five Tier 2 villages; out of a projected 310 properties to come from these villages, 245 are scheduled to come from Wombourne. Where is the justification?

4.4 The application of ‘Green’ policies set out in the Framework have not been applied to the fields (463 and 284) in Wombourne for the sake of expediency. In other words, the destruction of one of the most prominent and important localities in terms of Green Belt land, because a willing landowner is happy to sell at the earliest opportunity. And the rather reticent approach to designating a brownfield site adjacent to the village with no obvious impact on the greenbelt policy ideals set out in the Framework.

5.0 Conclusion

5.1 It is pleasing to note that the Government attaches great importance to Green Belts and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

5.2 It is great pity that South Staffordshire District Council has chosen to ignore the Government’s fine principles when identifying suitable sites across its District. It is clear that to meet timescales, the planning authority has developed its Local Plan on the basis of expediency rather than a fully considered approach.

5.3 Alternatives to using outstanding Green Belt land are available over the long term within South Staffordshire as detailed in the Local Plan, but it is obvious from the lack of evidence produced that little effort has been directed to unlocking their potential. The Framework states that *the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development makes as*

much use as possible of suitable brownfield sites and underutilised land. Quite clearly this has not been done, and if this Plan is adopted in its entirety, beautiful landscapes like the fields 463 and 284 will be lost forever, and their loss will open up the real possibility of urban sprawl from Wolverhampton, so that Wombourne loses its own identity and becomes a suburb of the city.

Yours sincerely

Keith Parry and Ann Harris

Appendix A - Comments specific to sites 463 and 284. Land off Billy Bunns and Gilbert Lane.

- Parcel 463 consists of three large fields surrounded by historic hedgerows and a large coppice on one side. It provides arable land which is farmed on annual cycles. It is completely separate from the urban influences of Wombourne and Wolverhampton, with a strong relationship to the open countryside.
- This is a landscape that has a strong traditional rural character, showing arable farming at its best - seeding, growing crops and harvesting. New housing development would totally harm that view and destroy the wonderful openness that is an essential characteristic of this Green Belt site.
- Along with Parcel 284, 463 is part of a natural barrier for avoiding coalescence with Wolverhampton. It is essential for maintaining a sense of separation between Wombourne and Wolverhampton, and importantly plays a role in checking unrestricted urban sprawl from the West Midlands conurbation. The land forms part of the narrow gap between Wombourne and Wolverhampton, and accordingly makes a strong contribution to preserving their separation.
- Parcel 463 and 284 form one of the most important visual landscapes to the village. From the western side it can be viewed from the A449. From the southern side, the fields are overlooked from the village and form a scenic countryside view, undisturbed by urban development. From the eastern side 463 can be viewed on a daily basis by thousands of people passing by on the A449 (a major arterial road). From the western side the field is overlooked from the village and forms a wonderful scenic view towards the Wodehouse

Historic Landscape Area, only interrupted by the A449, but with no urbanisation. Its openness is an essential characteristic of the existing Green Belt in which it lies.

- The fields are surrounded by ancient hedgerows, which are notable features of the landscape. They give aesthetic forming to the fields and provide vital resources for mammals, birds, and insect species. The hedges are an important habitat in their own right and act as wildlife corridors allowing dispersal between isolated habitats. We know that removal of these hedgerows, whether in part or in whole to facilitate new housing development will lead to loss of many local species, such as [REDACTED], dormice and bats. It is noted in the Plan that 463 is the closest for education accessibility purposes. In practical terms this will mean creating breaks in the ancient hedgerow facing School Road for pedestrian and road access to St Benedicts School and the central shopping facilities.
- Parcel 463 and 284 form a large part of the 'green corridor' that runs from Himley to the Wolverhampton border on the western side of the A449. Loss of this site would seriously harm the Green Belt and positively affect the integrity of the corridor which also includes ancient woodland. The eastern side of the A449 in this locality is dominated by the Historic Landscape Area associated with the Wodehouse. Housing development, with the connected significant highway changes such as new traffic lights, widening existing roads, new roundabouts, etc, in order to cope with the additional car usage onto the A449, would detract from the overall landscape quality of the area and seriously impinge on the characteristics of the Historic Landscape Area running alongside the A449.
- Within 463 is Smallbrook Farm, which consists of a farmhouse, barns, storage areas, paddocks and well established gardens surrounded by large mature trees. A second generation tenant farmer and his family reside in the farmhouse. We are aware that he has a third generation tenancy agreement, benefitting his son who is currently employed at the farm. It is a working farm, with over 250 acres of land including 463 and 284, under arable control, and grazing land for a cattle herd and a number of horses. Using this area of land

for housing development would deprive the locality of a working farm that provides employment, is a local supplier of goods and services, and contributes to the farming heritage associated with the village.

- We believe that Smallbrook Farm has been in existence since the 17th century and retains the main structure and features associated with its past history. We understand that windows in the property were bricked up to prevent the imposition of the window tax that was introduced in the 1600's. It is unfortunate that the owners of the property did not seek a local listing of the farmhouse in previous years. Accordingly it is important in historic terms that this farmhouse and its immediate surroundings are retained.
- The large field within 463 is used for grazing purposes associated with cattle farming and horses. This is an important site in regard to bio-diversity as it is a well-maintained pasture in good condition. There is an abundance and diversity of wild plants characteristic to the grassland type with lots of flowers visible between late spring and midsummer. The field sustains a strong breeding population of key invertebrates and birds. It is well known that a large variety of plants, animals and insects depend for their survival on this type of grassland. Removal of this outstanding rural feature will destroy for ever this area of rich bio-diversity.
- If the fields are developed for housing, the effect on the rich bio- diversity of the land, untouched for hundreds of years apart from farming, will be catastrophic. No amount of remedial action by developers will put back the loss of so many creatures and plants in this Green Belt area. We can find no evidence in the Local Plan Review that a full Ecological Impact Study has been carried out showing the likely effect when new development is built. Animals, birds, insects, reptiles, plants, and wild flowers that are present in and around the fields will be destroyed and will be irreplaceable.
- The contours of Parcel 463 define a lower ground level in the bottom half of the field that is adjacent to the A449 and Gilbert Lane. Flooding regularly occurs in Gilbert Lane which is alongside Parcel 284 where a significant part is designated under a Flood Zone 3 risk category. It is our view that with climate change and the provision of new housing development on 463 that the lower

part of 463 and the Gilbert Lane junction with the A449 will have to be defined as a category Flood Zone 3 risk. This increase in flood risk will significantly damage the habitat in the field, the ancient hedgerows and the mature trees that run alongside the A449.

284 – Land off Gilbert Lane.

- Parcel 284 forms a significant part of the ‘green corridor’ that runs from Himley to the Wolverhampton border on the western side of the A449. Loss of this site would seriously harm the Green Belt and positively affect the integrity of the corridor which also includes ancient woodland.
- The site is a small field that is used for arable purposes. In December 2013 it was designated as a Conservation Area Buffer Zone. There is real concern about the effect that new housing development will have on the adjacent Wom Brook Conservation Area. There are also concerns about the water quality of Wom Brook if new housing is built on this parcel of land, not least affecting rare endangered species such as the water voles that inhabit the brook area. New housing will also drive away or destroy the undisturbed habitat for such animals as the water voles (a highly elusive and endangered protected species) that live in and around the brook and also affect a wide variety of plants, animals, insects and birds such as kingfishers that visit the brook and surrounding fields.
- The contours of Parcel 284 define a lower ground level in the bottom half of the field that is adjacent to the A449 and Gilbert Lane. Flooding regularly occurs in Gilbert Lane which is alongside 284 where a significant part is designated under a Flood Zone 3 risk category. It is our view that with climate change and the provision of new housing development on 284, that the lower part of 284 and the Gilbert Lane junction with the A449 will have to be re-catergorised to a Flood Zone 3b risk. The increase in flooding will significantly damage the habitat in the field, the ancient hedgerows that surround the field and the nearby Wom Brook. I believe it will not be possible for developers to obviate the additional flooding risk that is caused by the new development, they will only be able to ‘mitigate’ the effects. This is a significant

environmental concern if the local authority is serious about preserving natural habitats and supporting bio-diversity.
