



**Local Plan**  
Publication Stage  
Representation Form

**Ref:**

**(For  
official  
use only)**

**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**

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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.

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## **Part A**

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1. Personal    2. Agent's Details (if Details\*  
applicable)

*\*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.*



Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Laura"/>	<input type="text"/>
Last Name	<input type="text" value="Smith"/>	<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="[REDACTED]"/>	<input type="text"/>
Line 2	<input type="text" value="[REDACTED]"/>	<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="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="[REDACTED]"/>	<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="/"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="/"/>
		<input type="text"/>		<input type="text" value="/"/>

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.

Firstly, the council has done everything in their power to make this process as difficult and inaccessible for the public as possible. In this particular consultation much has been made of the 'legal' and 'sound' aspect which has put people off replying presuming their previous objections will still stand. The planners even told me this plan is 'sound' and nothing the public are saying will be taken into account at this stage. This has been clear that despite an overwhelming public response during 2021 and subsequent changes in government to local plans, no significant changes have been made. During a meeting the local planners informed me that the independent inspector would look at previous objections- I have since been informed this is not the case, and sums up the misinformation and rhetoric throughout this process.

Take this form as a prime example; I have been trying to find where I can make my objections and have found a form located under the title of 'regulation 19' on the website after several mis-attempts. The form itself is a PDF and unable to write on, yet when converted to word the boxes are not text boxes! As someone who uses technology for my own job, the difficulty in accessing this current form is frustrating and I have had to persevere. This is certainly not compliant in ensuring vulnerable and hard to reach groups are able to easily access.

I have a personal interest myself in locality 5 in Wombourne.

Much has been made of Gove's recent letter to parliament and whilst I appreciate more needs to be done before it becomes policy, one thing that struck me was Gove says to give more say to local communities.

I spoke to the planners who said it is a sound plan. On speaking with them I can see they have completed the minimum research and have allocated sites from this, as is their job! What they have not done is take into account local knowledge and local reasoning.

For example, the site at Small Brook is a working farm that has 3 generations of farmers. It has been there for over 100 years. It is seen locally as a historic gateway into Wombourne. By building houses there, it is destroying local history as well as prime agricultural land. The farming community is dwindling and this plan is consciously aiming to remove that further.

There are employment laws for other sites locally, but little regard to the farming employment which I understand to be under a different law.

The site at Small Brook is also a high flood risk area. I'm sure you will have had numerous personal accounts from people highlighting this. Although the principles underlining Gove's letter have not yet been realised, it is demonstrating that you can have all the evidence and statistics, but to build on this land is morally wrong and will cause irreparable damage to Wombourne history.

Furthermore, you cannot say more has been done to liaise with the public, when there has been no liaison with local services whom this will greatly affect. We have two small GP practices in Wombourne. Dr. Meredith spoke very eloquently at a minuted parish council meeting and announced it was the first she had heard about it, but was clearly frustrated at the lack of correspondence during the 2021 consultation. If you are planning on creating nearly 1000 houses and potentially patients within the locality, surely it would have been professional courtesy to ensure they knew of the plans first rather than a week after the consultation had begun? There has been three housing developments (approx 400 houses) recently and despite an increase in patients, they have not been given any additional funding.

When I met with the planners a couple of weeks ago, they said there had been a misunderstanding and they had contacted the clinical commissioning board where there had been a 'miscommunication', but apparently the GPs were on board now and agreed there was capacity. Seen as there are two GPs off on long term sick at the Gravel Hill surgery and the other has subsequently retired citing this as part of the reason I beg to differ!

South Staffordshire local education authority have said they can meet additional need. Yet when you talk to the local schools, they are at capacity. My son's local school was meant to be made from a one form to a two form, but funding has been pulled with no plans to build in the near future.

According to the planners, 500+ does not meet the threshold for new infrastructure, yet the plan has not taken into account all the new builds in the last 12 months, let alone the last 30 years. There is a cumulative effect that they have not paid heed to, and whilst the individual sites may not meet the threshold for new infrastructure there is surely enough new houses that would require additional services.

The local planners explicitly said no parish councils have supported this plan. Yet the district councillor for Bilbrook and others stated they were representing their communities who DID want it during the vote. Additionally, the report on the consultation portal states that Holbrook and Bilbrook are in support. This is very misleading as it might only be an aspect they agreed e.g. they want a new school.

Interestingly the public were told we could only make one objection and that if several people made the same objection, it would still count as one. Yet on the portal, the developers have been able to make several in support of the plan for the same reasons. One particular company supported 9 times to the same point.

The council leader and members have created a campaign deliberately threatening councillors and the residents who have opposed the plan that if they do not agree we would be saddled with more houses. Terry Mason was scathing about Wombourne during the vote as he had apparently not known there was issues. I'm presuming this is more to do with the political party. However, it seems personal and political gains are being met here. As an independent that is surely something that should be looked into. During the district council meeting where the plan was agreed, it was mentioned that threatening emails had been sent to the councillors warning them to vote yes.

I do not believe the local planners did enough to reach and inform people of the consultations. I originally found out from a local facebook page that 300 houses would be built opposite my own home last year.

I started a facebook group to oppose the plans and amassed 1.3k within a week- the majority of people have said they found out via social media (unrelated to the council) and still there are residents and even local businesses who are not aware of this consultation now and still joining the group! There are over 2500 people now in the group.

As a group, we delivered 7500 leaflets during December 2021 to ensure people knew about the local plan. There was over 300 people who volunteered to deliver the leaflets I prepared. We had a just giving account to raise over £1000 to pay for these leaflets and banners. The banners were put up on a Sunday afternoon and were removed by 7am the next morning on the orders of a local South Staffordshire councillor. I know at least one of these was not attached to anything belonging to the council, and fail to see the reason they were removed, when the local Amdram and firework display have been positioned there previously. It was intended to keep people in the dark about this plan.

I believe it was the responsibility of south staffs to publicise this consultation, yet has fell to the parish council (some of whom are volunteers). Why would just a poster be given to that parish council-have they had a budget? Who is the poster to be given to? Why has this not been prominently displayed and just left to the discretion of shopkeepers? I have had so many complaints from businesses saying that they were open and not received one. Why was it not delivered to every household in Wombourne?

The website itself is very difficult to navigate and people have found the legal jargon and reference to appendices etc. challenging to comment on. This has not been an easy option for people.

With regards to previews consultations, my understanding is the Gilbert's Lane site was not in the original local plan. In 2018/19 how many people from Wombourne engaged with the consultation? I'm going to hazard a guess it wasn't many! In fact, I'm led to believe it was 25 people altogether for both and that tells me that the process was not effective at that time, and better measures were needed. It amazes me that the planners have awarded themselves for their communication when it is more likely the action group I have pioneered that has done their job for them.

The planners said a public notice was placed in the Express and Star newspaper. Even the political editor of the Express and Star said he had tried to contact the council several times about when the consultation started to no avail and was surprised to have found out after it had been printed that it was a small article



p.36 easily missed with all the other council notices going in. Let alone the amount of people who do not buy a newspaper!

Planners argued they post information on social media. Firstly, the South Staffs Facebook page has approx 7000 members. That is less than 10% if the district. Additionally, articles were written from a councillor's perspective AFTER the consultation had begun and a YouTube video produced on the 3rd November 2021.

Planners claimed they carry out direct mailshots to all those on their Local Plan database (currently circa 12,000 people and organisations) and those who have signed up for alerts on GovDelivery. Now the approximate estimate of the population in Wombourne alone is 14,332 (although I suspect is closer to 16,000) and I would imagine this publication goes to everyone signing up about the local plan which includes the Black Country and South Staffs, so what percentage of the population in these affected areas actually subscribe?

Planners also claimed they use the Council's Review newspaper, which is apparently delivered to every household in the district. Personally, I have not received a review and in the four years of living here do not recall having one and I certainly cannot tell you any significance to this publication. The majority of people I have spoken to have said the same.

Furthermore, the reason the planners had so many people engaging in meeting is because of myself and the group publicising it through our leaflets and Facebook. This would be evident when comparing how many have engaged in the first consultation to now, and was also evident from the numbers of comments of people attesting to this. Not one person I have spoken to has seen any information from local plans other than what we have shared on our FB page or encouraged them to research. To not acknowledge the increased levels of engagement being due to the facebook group and the residents of Wombourne, indicates a deliberate lack of awareness within the planning team.

The comments on how many older people engaged digitally was almost comical. Again, I would like to know the amount of people surveyed within Wombourne and how many 60+ years 80+years etc live here, how many were actually asked? It's a bit like the '8 out of 10' cats' scenario! Alternatively, I would be especially interested in a survey of HOW people have found out about this.

We are talking major infrastructure desperately needed and changes to our ways of life. This is not a small building, but will have a massive impact on changing the very nature of the village.

You can say that more has been done to engage the public, but it's clear to see by the number of people who were unaware that what you have done has not been effective, and no other measures have been put in place other than what myself and the group have worked hard to achieve, despite several pleas to the parish and district council. When the planners then 'congratulate' themselves on the measures they have taken when we have had 300 people doing their job through leaflets drops is surely evidence enough that the local planners did not do enough to engage with the public.

(Continue on a separate sheet /expand box if necessary)

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.



I believe a full review of the duty to co-operate numbers is required. Since 2014, the population and need has changed significantly. Other local authorities are no longer working together, and are changing or 'pausing' their plans. I do not believe they have exhausted all their potential brownfield sites without plundering South Staffs Green belt. I also don't think South Staffs have given due consideration to brownfield sites.

(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:

I would be happy to be a part of the hearing and to further comment on any points made.

***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