

From: [REDACTED]
To: [External Email for Local Plans](#)
Subject: Proposed Submission Local Plan - Objections/Views - Group Submission on behalf of Victoria Barns Residents
Date: 22 December 2022 21:55:28

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From: <[REDACTED]>
Date: Thu, 22 Dec 2022, 15:42
Subject: Proposed Submission Local Plan - Objections/Views - Group Submission on behalf of Victoria Barns Residents

[REDACTED]

The Views Document in this submission represent 12 residents of Victoria Barns – Situated within the proposed boundaries of Development of Land at Cross Green (Locality 2 ref appendix 5.31, Site Ref 646a & 646b)

There are several views we wish to be considered, some of which echo the overwhelming biases toward objection in the Preferred Options Consultation Statement published Nov 22, with some additional points around the evidence base and justification of the proposed plan.

At the outset of this submission, we would like to make it clear we object to the proposed development of 1200 houses at this proposed site.

We would also like to request that we would like to be granted a hearing session with the inspectorate when these commence in 2023 as at the least, we would like changes to the plan.

Our Views

Traffic Impact Assessment/Strategic Transport Assessment:

A Strategic transport Assessment has been undertaken on behalf of Taylor Wimpey; this represents a significant conflict of interest at this stage. The proposed land is already owned by Taylor Wimpey and has previously had planning permission denied, specifically citing that the requirements of releasing Green Belt Land were not met in the planning application. As Taylor Wimpey are the landowners, no other developer will have the option to facilitate the development. The STA undertaken therefore would have been more credible without any involvement from Taylor Wimpey and instead independently arranged by the stakeholders SSC/SCC/WCC/NH, to be assessed with no favourable bias.

The findings of this transport assessment also seem to significantly underrepresent the changes to future traffic. Specifically looking at Brinsford Lane for example the projections for increased traffic seem insignificant, yet this is proposed to be a main

access, linking ROF Featherstone developments and the A449 as well as supporting the travel to the rail park and ride. There are proposed to be 1200 houses, plus a significant and larger development in Penkridge that would also now use this route. We raised this at the public planning consultations in Nov 22 and were told by the strategic planning managers that “they’d hope people use public transport”, this shows a real lack of subjective and objective assessment and the STA itself states a deeper assessment would need to yet take place.

It is our view that this would show traffic and transport levels through Brinsford lane would be unfeasible, considering also it’s proximity to a busy motorway junction and busy A road where people would use this as a ‘cut through’ rather than queuing at the motorway junction in peak periods. The STA references a ‘pinch point’ at the railway bridge on Brinsford lane and proposes a shuttle lighting system. This again we feel downplays the significance of this challenge, the railway bridge only has width for a single vehicle and a low height restriction. Implementing a traffic light system with the increases to vehicle demand that we feel are likely would cause multiple traffic issues in the area including potential to queue back to the A449 in peak periods and significantly impact those travelling from the development already agreed near ROF Featherstone.

This would create traffic issues both sides of this bridge, representing more than a ‘pinch point’ and we find both the rationalisation of the Planning Managers to be unsound in ‘hoping’ that this isn’t the case, as well as the plan to use Brinsford lane as a main access and through route for a development of this size. There is also a consideration that the STA makes around ‘widening’ the carriage way. Our homes are positioned directly on the lane with no footpath or border to the road. Therefore, the route could not be widened, again we feel this is an unsound assessment. We also feel that due to the existing nature of the land ownership to a developer and this then being ‘chosen’ as a proposed site it may be legally uncompliant.

The significance of the football club based on the immediate access to Brinsford Lane has also in our view been poorly assessed. Wolverhampton Casuals was founded in 1914 and so has amassed a considerable following in the local area over this time. They play frequent games and there is already not enough parking for the number of spectators they attract. As a result, there are cars parked all along the lane when they are playing, currently this causes no issues. If the proposed main access is created this could have a huge impact on traffic, as well as the football club that relies on these spectators for revenue. As a sports institution that is hugely important to its local community, we feel the impact assessment on this has been neglected and should the club start to struggle as a result of the proposed plans there would be a lot of anger and resentment from the wide range of stakeholders in the club.

Green Belt:

At the planning consultations we were told by the Planning Managers that all brownfield land had been considered prior to making ‘the difficult but necessary’ decision to release greenbelt. This has been represented as a percentage of 0.75% by the plan to again make this seem insignificant. South Staffordshire has a very large area of greenbelt so this actually represents a huge amount of greenbelt land that would be developed under these proposals. It is clear in the responses in the preferred options consultation that there is an overwhelming sentiment across responses to multiple questions that this should not be the case. We questioned which brownfield sites were considered and were given very high-level answers, it is also not clear in the evidence base how SSC have assessed and deemed brownfield sites unsuitable. We propose that this should be done before any greenbelt is released, with a clear rationalisation of all brownfield sites available, all considered and

objective evidence of unsuitability so that the 'necessary' release of Greenbelt can be justified.

Regarding Necessity it was made clear to us in the public consultation meetings that the council were only doing this because they 'had to'. The planning managers made it clear that due to housing targets set by the DLUHC they were forced to consider greenbelt they would ordinarily not. SSC state they consulted the DLUHC on 3rd November 2022 to for advice on whether to delay the plan making process and were told there should be 'no pause' – this consultation was prior to the government removing the 300,000 annual target and making all housebuilding goals advisory only. These changes also allowed councils to build fewer homes if they can demonstrate that building them would 'significantly change the character of an area' and this was an exemption specifically aimed at rural communities. Our view is that it is unquestionable that developing greenbelt land in this area would undoubtedly change the character of the area and therefore in this regard the plan is now unsound. It should also be considered that this change in policy by the government was as a result of significant opposition of 100 ministers that planned to vote for the scrapping of housing targets that are destroying the character of villages/towns and suburban areas. The buildings we live in are historic farm buildings converted sympathetically at great cost to not disrupt the character this location has held for hundreds of years – if the proposed plans are not reviewed this will ruin the character so many people have worked to preserve.

As well as the changes within the DLUHC since this plan was proposed, there has been significant pressure on SSC to consider that their plan accounts for 4000 houses intended to support the black country authorities under the duty to co-operate. Again, this was to meet targets that now are not required. There has been press coverage of this and it is clear in the Preferred Options Consultation Statement (NOV 22) that this view is prevalent amongst responses. Dudley MBC has left the partnership and delayed to review their plans, the fact SSC have not taken this approach, despite these significant changes we find to be a totally unsound approach to planning - particularly where consequentially there is to be a release of greenbelt. It should be noted that there have been no changes to the plan as a result of the preferred options consultation despite the significant bias to objection by most respondents, this again reflects an unsound planning approach where stakeholder feedback has not been acted on.

Environmental Impact:

It is clear there will be significant environmental impact of this development, which SSC think is necessary. We find this to be an unsound assessment with wildlife displaced, key environmental landmarks destroyed, increases to pollution near an already busy motorway junction being just some of the factors of consideration. This is reflected as a wider concern within the Preferred Consultation Statement. All the environmental impact is unnecessary when considering there is now no mandate to act on duty to co-operate with the changes proposed by DLUHC and utilise greenbelt to do so unnecessarily, therefore the justification for environmental impact we deem to be unsound.

In summary these are some of the key points around our objections and views; We feel SSC have not acted on stakeholder feedback and changes to government strategy, as well as the points raised about the diligence and fastidiousness of the evidence base. We would propose a full review around the necessity of the plans, clearer justification before greenbelt is developed to ensure this is a last resort and at the very least changes to the plan around access points and provisions for transport.

Yours Respectfully,

The Residents of Victoria Barns