



**WOMBOURNE PARISH COUNCIL'S  
RESPONSE TO THE  
LOCAL PLAN PUBLICATION PLAN CONSULTATION  
MAY 2024**

Wombourne Parish Council wishes to respond to this current consultation first by noting its response to the previous consultation on Soundness. In the December 2022 consultation, WPC drew attention to a number of key areas where we believed the Local Plan Publication Plan at that time was deficient. These reasons for challenging the 'soundness' of the Local Plan was based on whether the Plan had been:

- 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)

However, we are pleased to alter our position in light of the re-drafted proposals presented by South Staffordshire District Council due to the significant alterations regarding overall housing numbers which we feel is now much more sensible and based upon reasonable needs within the South Staffordshire District, as well as the impact of this upon specific local sites, minimising new Green Belt allocations and removing all proposed Green Belt allocations in Wombourne itself.

The reduction in numbers greatly reduces the impact of new housing upon local infrastructure and we believe that where housing allocations remain District-wide, the provision of meaningful infrastructure must be the focus of South Staffordshire District Council and all stakeholders in order to deliver for residents and ensure communities are not negatively impacted.

Our revised responses under the four key points above are detailed below:

## **1.0 'Positively Prepared'**

1.1 In the foreword 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 continue to acknowledge this statement. It is why so many formal objections were submitted by Wombourne residents and the Parish Council in previous rounds of consultation. The overwhelming view was that the imposition of the proposed new housing sites would destroy the character of this beautiful village and impose major problems for future generations living here, particularly the Green Belt site at Smallbrook Farm.

1.2 Whereas previously we criticised the statement in the foreword to the Publication Plan, we now feel this is better supported in light of the plans alterations; i.e. 'Members have driven the development of the new Local Plan for South Staffordshire'. While we acknowledge this process is being directed by Central Government, we do recognise the significant influence of elected members of South Staffordshire District Council in the shaping of these latest proposals.

1.3 Where, in the foreword to the Publication Plan, it states 'that your views have helped us set out a strategy', we now agree that the widespread responses to prior consultation stages have helped to inform elected members and planners in formulating the new proposals; though we also wish to note that where infrastructure delivery is concerned, evidence of planning for suitable, meaningful and deliverable infrastructure is yet to be seen.

Direct mailing on this specific issue would have been better, as stated in our previous consultation response, as there are still issues with the widespread communication of these important issues.

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

1.5 The foreword states ‘the South Staffordshire Local Plan is based on robust planning evidence with infrastructure at its heart’. Here we remain sceptical and believe this may still not be the case, albeit with reduced housing numbers being a clear step in the right direction. In this regard, we therefore point to the now potential inadequacy of the document in being ‘positively prepared’ for the following reasons:

1.6 Firstly, we still cannot find any published information on whether area health authorities were consulted at strategic level on the imposition of such housing numbers (even the reduced 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 revised Local Plan proposals there still appears to be no clear provision for this vital infrastructure, and we seek detail on any potential health levy against properties built for local health services.

1.7 Secondly, at the previous consultation there was 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, and this should also surely inform the necessary housing mix. For instance, in Wombourne, more bungalows will be

required along with smaller starter homes, ideally given first refusal to local families.

1.8 Thirdly, questions remain as to whether the County Council's Education Authority, the Government's Education Department and individual local schools have been suitably consulted/accurately surveyed on the overall requirements for pupil provision over the plan period. Suitable provision for increased school capacity, or otherwise expressions of how increased local need may be met (for instance, alterations of catchment areas) needs to be identified as part of the Plan.

1.9 Fourthly, the evidence of consultation with the Highways Authority and seriousness with which that Authority has taken to examining the effects that traffic generated by new housing sites will have on existing settlements continues to raise concern. While we accept South Staffordshire District Council has limited impact upon this, it is expedient upon the Authority to pursue meaningful consideration of this issue from County Highways.

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 'safeguarded sites' remaining in the Local Plan proposals, for instance there is a statement that they are close to education. In respect of the Orton Lane site in particular, we suggest this statement is misplaced, though all remaining sites are at some distance from local schools and necessary alterations to road infrastructure such as pedestrian crossings, improved pavement provision/access as well as close examination of speed limits and options for sustainable 'green routes' will be required. As it is, it appears from the Highways Authority's individual site comments, that no regard for this school commuting reality has been assessed. We believe the 'carrot' of financial contributions from developers will have to be significant to pay for the necessary highway improvements.

### **1.10 Setting out a strategy**

1.11 As far as 'positively prepared', from the Wombourne area, some 400 objections were submitted at the 2021 consultation stage, including a strong detailed objection from the Parish Council. In fact, all Wombourne Parish Councillors endorsed that response in December 2021, and all 6 participating District Councillors objected to the emerging plan at the Special Council of South Staffordshire District Council on 8<sup>th</sup> November 2022.

While nowhere in the new Publication Plan is there reference to the numbers of objections raised, both in terms of the so called 'strategy' and individual sites, it is accepted these revised proposals demonstrate to a significant extent that residents' concerns have been taken into account in important places, notably the removal of Green Belt sites, though it remains to be seen in relation to comments made regarding local infrastructure pressures.

As such, where we previously commented that we believed the Local Plan had been 'negatively prepared' because of the huge opposition from local residents to the planned sites and lack of reference to this volume to the Inspector, we now

withdraw this comment but reserve judgement in relation to infrastructure planning and provision.

1.12 Further to the above, it must also be acknowledged that in preparing objections to certain sites during the 2021 consultation, which took many hours to do, without recourse to a planning consultant, some concerns of residents and the Parish Council, particularly in relation to the subsequent removal of Green Belt sites have clearly been taken into consideration by South Staffordshire Council and we are grateful for this.

1.13 In summary, we now feel the Local Plan has been more 'positively prepared' because of the clear re-examination and alteration of proposals by the District Council. However, it remains apparent that the limitations of certain strategic consultation with the major stakeholders set out above, means that decisions remain at risk of being left to piece-meal negotiation with developers and landowners of individual sites. We remain keen to see published formulas for financial/provisional contributions that would give us greater confidence. Subject to this, we could consider this amended plan to be 'positively prepared'.

## **2.0 'Justified'**

2.1 As can be seen from the table below, Wombourne is listed as a Tier 2 village. It is obvious from the projected numbers in the revised plan that Wombourne is now scheduled to take a more proportionate number of new dwellings in the list of Tier 2 villages, which is much more justifiable. It is also positive to see the reduction in overall proportion of housing allocations and relative to the Tier 1 village allocations this appears to clearly reflect infrastructure concerns, albeit it does not negate them.

However, we also continue to believe the distribution of new dwellings should be shared between Tier 5 villages in South Staffordshire because, as it stands, Tier 5 villages remain untouched which only entrenches their unsustainability as places to live for younger local people and ensures they will remain places only the wealthy can aspire to reside. We do feel this remains a missed opportunity in these proposals.

Spatial Housing Strategy 2023 - 2041		Indicative minimum dwelling numbers 2023-2041 <sup>4</sup>		
Location	Total proportion of housing delivery	Existing planning permissions and allocations	Safeguarded land	New allocations
<b>The district's rural area</b>				
<b>Tier 1 villages</b>	<b>60.6%</b>	<b>419</b>	<b>890</b>	<b>1844</b>
Penkridge	24.8%	93	88	1109
Codsall/Bilbrook	24.5%	110	584	581
Cheslyn Hay/Great Wyrley	11.3%	216	218	154
<b>Tier 2 villages</b>	<b>17.6%</b>	<b>299</b>	<b>614</b>	<b>0</b>
Wombourne	5.7%	16	280	0
Brewood	1.2%	1	63	0
Kinver	2.8%	61	82	0
Perton	7.1%	220	150	0
Huntington	0.8%	2	39	0

*South Staffordshire Local Plan Review – Publication Plan, May 2024, p 40*

2.2 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.

It is now apparent in the revised proposals that these broad locations are more central to the Local Plan, thanks largely to the removal of much of the unnecessary allocations for the GBHMA and many Green Belt sites. This further helps to refute the previous concern that sites were based on ease of delivery rather than taking the proper strategic approach. This altered planning strategy is much more clearly justifiable and is supported.

2.3 Regarding the statement in the foreword of the Publication Plan ‘providing affordable homes and jobs and will bring about new or improved local services and facilities and public open spaces’, it remains to be seen where such improvements can be delivered in Wombourne and we need to see justification



of this statement with evidence. In particular, this means close examination of what it means to provide 'affordable' homes and we seek means by which these may be offered to local people first.

2.4 We remain concerned that if there is no specific evidence of required improvements at the Local Plan stage, reliance will remain on individual negotiation at the planning application stage, where it can be expected that developers/landowners will argue they do not have to pay anything towards such improvements.

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 not be fully researched and not properly costed. The Plan does not specify that financial contributions will be held only for local use. As 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 and this must be avoided to the fullest extent possible.

2.5 Large-scale development should always be guided by an overall strategic plan, recognising the inter-relationship between housing, employment, health facilities, education provision, recreation, shopping, etc.

For example, the formerly proposed housing development for the fields identified as 463 and 284 would have had no employment base or any large-scale shopping/supermarkets nearby, in order to serve the needs of over 200 new households. 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, and so we support the removal of these sites.

2.6 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. As previously, we are pleased that sites 463 and 284 have been taken out of the new Local Plan proposals and we therefore believe due regard to the guidance given in the NPPF regarding ‘openness’ is much better met.

2.7 Nonetheless, we believe better alternatives than the ‘safeguarded land’ sites remain in the area, but it is suspected 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 all efforts 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 obviate the need for all other sites allocated to Wombourne.

While we agree the new proposals are a strong improvement on the previous version of the Local Plan, we also insist this site must not be dismissed as a viable alternative to those ‘safeguarded sites’ currently outlined in the new proposals as this would be most amenable to the majority of residents.

### **3.0 ‘Effective’**

3.1 While much more effective at meeting its intended outcomes than the previous plan, the amount of housing being much more realistic, as above we remain of the view that the proposals are based upon ‘easy wins’ where landowners are willing to sell within the plan period. In following the ‘easy win’

approach we are potentially missing out on options in better locations and allocation of brownfield sites (such as the Copart site) which are not being pursued because they may take longer to develop within the plan period. Nonetheless, this new version of the Local Plan is likely to be much more effective than the former.

3.2 This Plan appears much more effective due to the removal of most allocations towards the GBHMA and the cross-boundary strategic complications that would create. Therefore, we can be satisfied to a much greater extent that the issues faced by the remaining housing allocations are largely our own.

#### **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 now manages to better promote a sustainable pattern of development because of the exclusion of the majority of housing allocations for the GBHMA, alleviating substantial pressure for many settlements across the District and will therefore positively affect major planning influences that would affect the District as a whole and on individual areas within the District. However, it is still 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 still needs to better detail any of these important considerations.

**4.2 Comment-** The Local Plan now better meets its objectively assessed housing need, being based on an almost entirely local housing need. While we remain sceptical this is a proper needs-led approach, as opposed to being based on availability of individual sites where Wombourne is still making a strong contribution, it is now much more justifiable and proportionate, reducing allocations from c530 dwellings to 280.

4.4 The application of ‘Green’ policies set out in the Framework must be applied to the remaining ‘safeguarded sites’ in the new proposals, but removal of the fields 463 and 284 in Wombourne certainly helps to make this more achievable than in the original plans set out previously. In other words, avoidance of the destruction of one of the most prominent and important localities in terms of Green Belt land at Smallbrook Farm is a positive alteration in this regard and is strongly supported. We must ensure, however, that the remaining sites strongly hit these essential policies in order to mitigate/prevent further impacts of Climate Change.

## **5.0 Conclusion**

5.1 Wombourne Parish Council is very pleased to see the removal of Smallbrook Farm (sites 463 and 284) from the new Local Plan proposals. This helps us to greatly retain the character of our historic village centre and in particular, the approach to Wombourne from the highly developed West Midlands. We feel this decision will be supported by the overwhelming majority of villagers.

5.2 It is pleasing to note that the Government has further demonstrated that it 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 by amending the National Framework to enable greater protection of the Green Belt in spite of and by relaxing the Duty to Co-operate with neighbouring authorities. This has the impact of retaining local character and making provision of necessary infrastructure more achievable than before and encourages neighbouring urban authorities to think again about how they meet their own housing needs.

5.3 Wombourne Parish Council remains committed to fighting for the inclusion and provision of the necessary (as well as desired) additional infrastructure and improvements to existing infrastructure in order to make it possible to successfully tie-in proposed developments to the existing community, mitigating additional pressures. Notwithstanding the comments in the paper above, we remain committed to ensuring the community of Wombourne sees the greatest possible benefits from further development, but despite continued reservations around the ability to deliver such improvements and infrastructure, we do, on balance, accept this revised Local Plan proposal as ‘sound’.

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