



**WOMBOURNE PARISH COUNCIL'S
RESPONSE TO THE
LOCAL PLAN PREFERRED OPTIONS CONSULTATION
DECEMBER 2021**

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Statement

Wombourne Parish Council understands the requirement of South Staffordshire Council to comply with Government policy in relation to providing homes for future generations, and the requirement to have a Local Plan in place by 2023. However, there are grave concerns about some of the sites allocated in the Village, and the infrastructure to support them, as part of this consultation, which will be addressed below.

Introduction

The Parish of Wombourne lies within the Southernmost part of the District of South Staffordshire. With a population of 14,157 residents by the 2011 census, and certainly more today, it is home to around 6500 homes which accounts for approximately 14% of all homes in the District.

Wombourne is the largest settlement within South Staffordshire, despite only being a Tier 2 village according to South Staffordshire Council's Rural Services and Facilities Audit. This status denotes the range of facilities within the village of Wombourne, which includes a substantial High Street that features dozens of shops, hospitality establishments, salons of various kinds as well as a secondary high street known as Blakeley High Street. There are also several small parades of shops and a large supermarket on the edge of the village (a small retail park that will soon feature a Lidl is also in development), two GPs surgeries, five primary schools, one of which caters to SEND children, and a high school. The village also possesses several public parks, playing fields and open spaces including the Wombrook Walk and a stretch of South Staffordshire Railway walk. It is also home to Wombourne Leisure Centre as well as two longstanding cricket clubs, a tennis and a bowls club, plus a golf club outside of the village at Penn Common.

Despite this range of services, the village possesses no railway station, unlike Tier 1 settlements, and is also only partially serviced by bus routes despite its size. The village has continued to grow, outstripping the size of settlements in the Tier 1 and 2 categories despite the lack or limitations of these essential sustainable public transport options. Wombourne features highly in terms of numbers of households without access to a vehicle. Wombourne North consists of 13.1% of households, around the District average, with Wombourne South East at 17.6% - a substantial divergence. Wombourne South West appears far lower which may be due to the fact the ward is underserved by public transport. This is a major problem as we look at sustainable travel and the impact of climate change. Wombourne already struggles with pressure on its road network.

Wombourne has been subject to consistent development each year for over 40 years, and there is understandable local concern that the continuation of such housing expansion is destroying local ecology, impacting the very nature of the village itself and undermining already strained infrastructure, whether roads, schools, dental and GP practices. It will be important to establish the consequences of any proposed development on all of these factors.

The boundary of the village to the West remains the Bridgnorth Road B4176 which is built up to. On the Eastern side, the village sits back a short way from the Stourbridge Road A449. This separation is perceived by residents and the Parish Council alike as essential in maintaining the character of the village from the perspective of its busiest approaches. This has already been undermined by the construction of the Fletcher's Rise development between the A449 and Beggar's Bush Lane, which alters the relationship between the village and the main road. This is to the detriment of the village itself. The Western side of the B4176 should remain unbuilt in order to maintain the character and viability of Wombourne as a distinct village in its own right, and so too must a distinct boundary be maintained between the village and the A449.

The District is getting older, and while Wombourne benefits as a large community from a proportionately greater number of younger families with proximity to good local schools, this trend in the growth of the aging population still continues within the Parish. Life expectancy is also marginally higher than the national average which maintains pressure on housing stock. There are substantial pockets within the Parish suffering from rural isolation, with a majority of the village scoring at least a medium in risk of loneliness, if not worse, with none of the Parish featuring in the 'very low' category.

Wombourne's South West ward is the most deprived ward in the District with attendant pressure on the quality of Housing Association properties and poorer outcomes for children. This ward also features very high in terms of residents with poor health and experiencing ASB, and this raises understandable concern for the make-up of housing that is proposed. The village as a whole is rapidly becoming unsustainable for residents growing up in the village. It already possesses a house-price average above the District average, which makes new homes built much more likely to go to wealthy professionals with few links to the area rather than to Wombourne's own next generations who will be forced to leave the area or seek inadequate and inappropriate housing within housing association properties and submit themselves to the long waiting lists this already entails. There are 864 South Staffordshire Housing Association (SSHA) properties in the Parish (SSHA study, 2017) with many in poor condition and subject to regular complaints by residents. Brownfield land exists within the village which could be redeveloped to help meet housing need, and especially new SSHA housing stock. These sites are often derelict and unused garage blocks owned by SSHA that attract ASB.

Unaffordability is also evidenced by the Enterprise and Growth survey undertaken in 2018 by South Staffordshire Council. The pandemic has made affordability much worse due to the number of people who are seeking to move to rural areas such as Wombourne. The profile for developments is suggested as 75% 3 bed or less. This is too low. This should be closer to 90%. Also, 30% is considered 'affordable' (which is questionable in its own right), however this should also be 40%.

This outlines some of the facts and problems facing the village long-term, and forms the basis for the Parish Council's concerns regarding the 'Preferred Options' proposals. There are understandably widespread concerns for our green space surrounding the village which forms so much of its character. Where homes are required, South Staffordshire Council's own avowed position to utilise 'Brownfield first' must be honoured. Wombourne possesses the largest piece of Brownfield to be considered in this review, and Wombourne Parish Council will be making the case for this to be the prime option for housing alongside other Brownfield where it can be identified. This is supposed to be an 'infrastructure-led' approach, and much concern is placed on the stretched nature of services and crumbling infrastructure that currently exists. This review must specify the infrastructure proposed in order to demonstrate the sustainability of any proposed future housing that will ensure

it improves the lives of residents, rather than simply maintaining the status quo or making things practically worse.

General concerns

Wombourne Parish Council appreciates South Staffordshire have a duty to co-operate, however there are concerns over the outdated study. This indicates the requirement for additional housing to contribute towards the unmet needs of the GBHMA of 4,000 homes. Wombourne Parish Council strongly feel this should be re-visited to re-assess the need.

Scrutiny of the Black Country Core Strategy

Urban Capacity Review

The current Black Country Core Strategy (2011), and associated development plan documents, identify where the majority of the development needs of the Black Country will be accommodated up to 2026. A key priority for the current Core Strategy was to focus development into a series of strategic growth corridors and centres and to promote a brownfield first strategy, since all identified needs could, at that time, be accommodated within the urban area.

- Why only growth corridors when it is their housing need?

Para 136 of the NPPF states that: “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.” Para 137 goes on to explain that: “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, 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.”, in particular: “whether the strategy: (a) makes as much use as possible of suitable brownfield sites and underutilised land; (b) optimises the density of development ... including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.

- Exceptional circumstances for a fuller consideration of Greenbelt use do exist. This is clear from the numbers being sought from neighbouring authorities under the Duty to Co-operate. The Greenbelt of other authorities is being placed at significant risk for the convenience of the Black Country authorities which helps to protect a greater proportion of their Greenbelt. This is unfair and unreasonable. The Black Country, if in such dire need, needs to sacrifice its Greenbelt before Wombourne and other villages in South Staffordshire have to sacrifice ours.

The Black Country Authorities will also continue to engage with neighbouring local authorities over employment land provision. A key element of the existing Black Country Core Strategy is reliant upon the provision of strategic employment sites in South Staffordshire to contribute towards meeting needs arising in the Black Country and which cannot be met within the administrative area.

- If South Staffordshire is supplying substantive employment land, why also housing? Where is co-operation coming the other way?

Demolitions

The BCCS assumed that nearly 6,900 homes would be demolished up to 2026 as part of housing renewal schemes across the Black Country, with half of these predicted to take place during 2016-26. The replacement rate assumed for these sites was 52% overall, therefore it was assumed that housing renewal would remove 3,340 homes from the housing supply by 2026.

- These housing demolitions are no business of South Staffordshire and form reasonable housing stock management, building better homes that meet sustainability requirements. However, this housing management should not be used to push homes out into other authorities when it is known they will return in the future. These missing homes should be added to the figures established within the review, which removes some required allocations under the Duty to Co-operate.

Density

BCCS Policy HOU2 and the associated Table 8 expect all sites of 15 homes or more to achieve a density of 35 dwellings per hectare (dph), net of open space and major roads. 35 dph generally relates to a development with a mix of house sizes and no flats. The Policy also requires developments of 60 dph or more (which generally have a majority of flats) to be located within strategic or town centres, and for other high density developments (45-60 dph) to have good access to residential services by foot or public transport.

The GBBCHMA Strategic Growth Study reviewed density assumptions on existing identified sites across the wider Housing Market Area with a view to increasing densities of future developments where possible. This excluded sites with planning consent. Based on the analysis undertaken the Study concluded that: “it would be reasonable to assume minimum densities of 40 dph are achieved in the conurbation (Birmingham and the Black Country urban area), with minimum densities of 35 dph in other parts of the HMA. This approach would yield an additional supply of 13,000 dwellings, principally over the period to 2031” (para 1.33). In particular, the Study concludes that, for sites of 200+ homes: “in areas such as ... the Black Country there are total gains of ... 1,000 dwellings ... when using 40 dph as a minimum” (para 6.42), and “At 40 dph, the contribution from small sites in the Black Country increases by around 3,000 dwellings based on the available evidence” (para 6.48). It should be noted that the conclusion for smaller sites, which make up the majority of housing supply, was based on a sample of sites only. Therefore, the Study concludes that increasing the minimum density of all sites without planning consent to 40 dph through an immediate change in planning policy could generate 4,000 further homes in the Black Country

- The Black Country Plan establishes a minimum density of 35 dph. There is a requirement by government to increase density in urban environments and increased density should be considered more widely and this is supported in 3.1.9. Rural areas possess a distinctly different character to urban areas, and so it follows substantially lower density should be allocated to rural areas.

In summary, if there is housing capacity in the Black Country, this should come through first, especially brown field sites.

Infrastructure

Wombourne is becoming a hub for satellite villages, for example, South Staffordshire Council are suggesting that residents of Lower Penn can use infrastructure in neighbouring villages, as such, this will mean that our services become even more stretched.

Traffic

Access into and out of the village is an issue, filter lanes coming in or out of the village need to be improved. This applies to developments on land of Poolhouse Road and Billy Buns Lane / Gilbert Lane especially.

There are also concerns in relation to historic bridges and infrastructure within the village, including the bridge near Round Oak Public House and Bratch Locks, and what affect an increase in traffic will have.

There have been 11 road traffic accidents since 2016 in and around sites 463 & 284, 2 of which were of serious incident severity, and 9 were slight severity.

(crashmap.co.uk) Increasing the volume of traffic in this location will inevitably increase the risk of further traffic collisions.

See also Appendix 5.

Footways

There will be an increase in inconvenience to pedestrians, as well as significant safety concerns with the increase in vehicles because of these developments, particularly in the village centre, and also along routes to schools. Families are being encouraged to walk to school where they can, however, the current infrastructure in place does not allow for this to be done safely.

Street lighting is also a concern, as it is very lacking in areas, particularly along Poolhouse Road, where there is also a lack of footways in place currently.

Historic environment

Wombourne Parish Council urge you to re-review the Historic Environment Character Assessment January – 2011, as a reminder of the importance of maintaining the village aspect that both residents and visitors have come to know and love.

[Microsoft Word - Appendix 6 Swindon, Wombourne and Wheaton Aston comments from SSC.doc \(sstaffs.gov.uk\)](#)

Environmental

Wombourne Parish Council are also concerned about the increased air pollution due to the increased volume of traffic coming into and out of the village. The ecology of land is damaged when more houses are built.

Wombourne Parish Council have been informed by Friends of Wombrook an increased population and visitors to the area in and around the Wombrook puts natural habitats at risk, for example there is a decline in Kingfishers and Dippers. Over the past year, in the Brook and/or Bankside there have been sightings of:

- Water Vole
- Otter
- American Mink
- Badger
- Hedgehog
- Fox
- Stone Loach
- Bullhead
- Three spined Stickleback
- Roach
- Carp
- Minnow
- Eel
- Tadpoles
- Signal Crayfish
- Grey Wagtail
- Kingfishers
- Dipper
- Chaffinch
- Egret
- Heron
- Robin
- Tree Sparrow
- Bluetit
- Goldfinch
- Dragonflies
- Large Red Damselfly
- Beautiful Damselfly
- Banded Damselfly
- Brown Hawker
- Cinnabar
- Moth
- 6 Spot Burnet Moth
- Tiger Moth
- The following Butterflies – Ringlet, Comma, Painted Lady, Marbled White, Small White, Common Blue, Small Copper, Small and Essex Skipper, Red Admiral, Holly Blue, Meadow Brown.

See also Appendix 6.

Flooding

Due to the effects of climate change, Wombourne is experiencing higher density in rain fall, which is of particular concern in relation to sites 463 & 284 – Wombourne Parish Council will discuss its concerns in more detail in relation to these sites below.

See also Appendix 4.

Intense rainfall associated with severe flash flooding could become almost five times more likely by the end of this century.

(Energy and Climate Intelligence Unit 2021)

Waste Water Collection and treatment

Capacity restrictions have been identified at Wombourne Waste Water Treatment Works and improvements are likely to be required.

(South Staffordshire Council's Infrastructure Delivery Plan 2017)

- There are already capacity issues as highlighted in this report, the service will only be further stretched by any new developments, so improvements must be made.

Public transport system

Half of the village does not have access to public transport currently. Wombourne Parish Council would urge South Staffordshire Council to seek to ensure that there is a bus service which would service all areas of the village.

Provision of a thriving High Street

Bilbrook, Brewood, Cheslyn Hay, Codsall, Great Wyrley, Kinver, Penkridge, Perton and **Wombourne** are defined as Main Service Villages. These will be the main focus for housing growth, employment development and service provision. Village centres will be the focus for new shopping and small scale office development to maintain their vitality and viability.

(South Staffordshire Council's Infrastructure Delivery Plan 2017)

- Wombourne Parish Council remain proud of our High Streets and the resilience of our retailers, especially during the pandemic. However, the Parish Council cannot accept our village centre has been the focus for new shopping and small-scale office development. In fact Wombourne currently has 6 empty retail units in the village centre alone (and out of the village shops, 4 of those are charity shops), and the Parish council cannot see what investment South Staffordshire Council have made to change this outside of what has been provided for each village as a result of the pandemic i.e. reduced business rates for new start up businesses. Parking capacity in the village is completely stretched which ultimately results in a loss to our local economy as people are unable to stop and visit the shops and cafes due to lack of parking.

GP surgeries

Wombourne Parish Council have contacted both GP surgeries in the village, and our findings can be found in Appendix 1.

Both surgeries are currently looking for GP's and both require additional space in order to be able to service residents, therefore significant funding will have to be allocated to them.

Schools

Wombourne Parish Council have contacted all schools in the village, and our findings can be found in Appendix 2.

Wombourne Parish Council were pleased that St Bernadette's Catholic Primary School asked their year 3 and year 4 students to send us their views on the proposed developments, as part of their literacy work on persuasive arguments. Their views can be found in Appendix 7.

Site specific responses - 416

Site Reference	416	Village	Wombourne
Minimum capacity	57 dwellings	Address	Land off Orton Lane
Site area	2.8 ha	Proposed use	Housing

Wombourne Parish Council acknowledge this site is Safeguarded land, and therefore has already been removed from the Greenbelt. However, there are still a number of concerns as South Staffordshire Council have identified in their Sustainability Appraisal Document. Where applicable to Wombourne the items are in **bold**:

Views for Local Residents:	The proposed development at Sites 280, 283, 284, 285, 298, 305, 306, 309, 335a, 335b, 416 , 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 could potentially alter the views experienced by local residents, including those on Pool House Road, Wood Road and Bridgnorth Road.
Therefore, a minor negative impact on the local landscape would be expected.	

Urbanisation of the Countryside:	Sites 283, 284, 285, 298, 309, 416 , 438, 458, 459, 463a, 463b, 463d, 477, 554, 626, 627, 628, 629, 707 and 708 are located in the open countryside surrounding Wombourne.
The proposed development at these 20 sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.	

Groundwater SPZ:	Site 438, the majority of Site 280 and a small proportion of Site 298 coincide with the inner zone (Zone I) of a groundwater SPZ. The majority of Site 298 and a proportion of Sites 280, 554 and 708 coincide with the outer zone (Zone II) of a groundwater SPZ. Sites 283, 284, 285, 286, 305, 306, 309, 310a, 310b, 335a, 335b, 416 , 416a, 417, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 479a, 562/415, 626, 627, 628, 629, 701, 707 and a proportion of Sites 554 and 708 coincide with the catchment (Zone III) of a groundwater SPZ.
The proposed development at these 35 sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.	

Previously Developed Land:	Sites 310a, 310b and 460 comprise previously developed land. The proposed development at these three sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 335a, 335b, 416 , 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 either wholly or partially comprise previously undeveloped land.
The proposed development at these 32 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.	

ALC:	Sites 283, 284, 285, 298, 305, 306, 309, 335a, 335b, 416 , 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 627, 628, 629 701, 707 and 708 are wholly or partially situated on ALC Grades 2 and/or 3 land, which are considered to be some of South Staffordshire’s BMV land.
Therefore, a minor negative impact would be expected as a result of the proposed development at these 29 sites, due to the loss of this agriculturally important natural resource. Sites 280, 286 and 626 are situated on ‘urban’ land. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.	

NHS Hospital:	The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Sites 335a, 335b, 479a and 707 are located within the target distance to this hospital. The proposed development at these four sites would be expected to have a minor positive impact on the access of site end users to this essential health facility. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 310a, 310b, 416 , 416a, 417, 438, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 554, 562/415, 626, 627, 628, 629, 701 and 708 are located outside the target distance to this hospital.
The proposed development at these 31 sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.	

GP Surgery:	The closest GP surgeries are Dale Medical Centre and Gravel Hill Surgery, both located towards the centre of the cluster. Sites 284, 306, 463b, 463c, 463d, 562/415 and 701 are located within the target distance to one of these GP surgeries. The proposed development at these seven sites would be expected to have a minor positive impact on the access of site end users to GP surgeries. Sites 280, 283, 285, 286, 298, 305, 309, 310a, 310b, 335a, 335b, 416 , 416a, 417, 438, 458, 459, 460, 463a, 477, 479a, 554, 626, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these GP surgeries.
The proposed development at these 28 sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.	

Historic Character:	Sites 280, 285, 286, 298, 305, 310a, 310b, 416 , 416a, 417, 438, 458, 459, 460, 477, 554, 562/415 and 708 are located within an area of high historic value. Sites 283, 284, 306, 309, 463a, 463b, 463c, 463d, 626, 627, 628, 629, 701 and 707 are located within an area of medium historic value.
The proposed development at these 32 sites could potentially have a minor negative impact on historic character.	

Bus Stop:	Sites 284, 335a, 335b, 463a, 463b, 463c, 463d, 479a, 626, 627 and 707 are located within the target distance to bus stops on Church Road, Plantation Lane, Smallbrook Lane, Brickbridge Lane and Bridgnorth Road, providing regular services. The proposed development at these eleven sites would be likely to have a minor positive impact on site end users' access to bus services. Sites 280, 283, 285, 286, 298, 305, 306, 309, 310a, 310b, 416 , 416a, 417, 438, 458, 459, 460, 477, 554, 562/415, 628, 629, 701 and 708 are located wholly or partially outside the target distance to a bus stop providing regular services.
Therefore, the proposed development at these 24 sites could potentially have a minor negative impact on site end users' access to bus services.	

Railway Station:	The closest railway station is St George's Metro Station, located approximately 8km to the north east of the cluster.
Therefore, the proposed development at the 35 sites in this cluster would be likely to have a minor negative impact on site end users' access to rail services.	

Local Services:	The nearest convenience stores include Costcutter, Sainsbury's and Co-op. Sites 284, 286, 305, 417, 460, 463c, 626 and 701 are located within the target distance to one or more of these convenience stores. Therefore, the proposed development at these eight sites would be expected to have a minor positive impact on site end users' access to local services. Sites 280, 283, 285, 298, 306, 309, 310a, 310b, 335a, 335b, 416 , 416a, 438, 458, 459, 463a, 463b, 463d, 477, 479a, 554, 562/415, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these convenience stores.
The proposed development at these 27 sites could potentially have a minor negative impact on the access of site end users to local services.	

Primary School:	Wombourne is served by several primary schools, including Blakely Heath Primary School, Westfield Community Primary School, St John's C of E Primary School, St Bernadettes Catholic School and St Benedicts Biscop C of E Primary School. Sites 280, 283, 284, 286, 306, 438, 459, 463a, 463b, 463c, 463d, 477, 562/415, 628, 629 and 701 are located within the target distance to one or more of these primary schools. The proposed development at these 16 sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected.
Sites 285, 298, 305, 309, 310a, 310b, 335a, 335b, 416 , 416a, 417, 458, 460, 479a, 554, 626, 627, 707 and 708 are located wholly or partially outside the target distance to these primary schools, and therefore, the proposed development at these 19 sites would be expected to have a minor negative impact on the access of new residents to primary education.	

Access to Employment:	All sites in this cluster are located in or adjacent to areas with 'poor' or 'unreasonable' sustainable access to employment opportunities, and therefore, the proposed development at these 35 sites would be expected to have a minor negative impact on site end users' access to employment.
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Wombourne Parish Council note from South Staffordshire Council's site assessment that an FRA will be required, and that South Staffordshire Council need to consult with Severn Trent Water Plc regarding foul / sewer connection availability and point of connection/capacity.

The infrastructure concerns with this site are:

General concerns	Site specific concerns
School places	Traffic congestion
Doctors – capacity in numbers and physical space	
Dentists – capacity in NHS places	
Local Policing teams – capacity to cope with such a large increase of residents	

Site specific concerns - 285

Site Reference	285	Village	Wombourne
Minimum capacity	82 dwellings	Address	Land off Poolhouse Road
Site area	3.9 ha	Proposed use	Housing

Wombourne Parish Council acknowledge this site is Safeguarded land, and therefore has already been removed from the Greenbelt.

There are several site-specific concerns in relation to this site, firstly - traffic congestion. To solve this issue, Wombourne Parish Council would like to see a traffic control system in place, for example, traffic lights or an island.

Improving public transport in this area would alleviate some of the traffic issues. At present there are no footpaths, street lighting or bus services in this area meaning elderly and disabled people in particular would be disadvantaged if this site was selected.

Wombourne Parish Council have been informed by residents in Hellier Drive that there was significant rock face damage spilling into gardens as a result of HGV traffic (traffic vibrations) along Poolhouse Road. This is a major concern given the proposed development sites. See Appendix 3 for letter from Staffordshire County Council in relation to closing Bratch Common Road due to traffic vibrations.

Flooding is also a concern, and is a regular occurrence in Poolhouse Road, as can be seen in photographs in Appendix 4. Therefore, whilst Severn Trent may have plans to deal with the infrastructure issues relating to flooding, rain fall is only going to increase as more homes are built.

There are a number of concerns with this site as South Staffordshire Council have identified in their Sustainability Appraisal Document. Where applicable to Wombourne the items are in **bold**:

Views for Local Residents:	The proposed development at Sites 280, 283, 284, 285 , 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 could potentially alter the views experienced by local residents, including those on Pool House Road, Wood Road and Bridgnorth Road.
Therefore, a minor negative impact on the local landscape would be expected.	

Urbanisation of the Countryside:	Sites 283, 284, 285 , 298, 309, 416, 438, 458, 459, 463a, 463b, 463d, 477, 554, 626, 627, 628, 629, 707 and 708 are located in the open countryside surrounding Wombourne.
The proposed development at these 20 sites would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.	

Groundwater SPZ:	Site 438, the majority of Site 280 and a small proportion of Site 298 coincide with the inner zone (Zone I) of a groundwater SPZ. The majority of Site 298 and a proportion of Sites 280, 554 and 708 coincide with the outer zone (Zone II) of a groundwater SPZ. Sites
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	283, 284, 285 , 286, 305, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 479a, 562/415, 626, 627, 628, 629, 701, 707 and a proportion of Sites 554 and 708 coincide with the catchment (Zone III) of a groundwater SPZ.
<p>The proposed development at these 35 sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.</p>	

<p>Watercourse:</p>	<p>Sites 280, 298, 438 and 626 are located adjacent to the Staffordshire and Worcestershire Canal, and a proportion of Sites 554, 562/415, 627 and 708 are located within 200m of this watercourse. Sites 284 and 305 are located adjacent to the Wom Brook. A proportion of Sites 306, 460, 463c, 463d and 701 are located within 200m of this watercourse. Sites 310a, 310b, 458 and 460 are located adjacent to the Smestow Brook. Site 417 and a proportion of Sites 285, 305 and 309 are located within 200m of this watercourse. Site 335b and a proportion of Sites 335a and 479a are located within 200m of a minor watercourse.</p>
<p>The proposed development at these 25 sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.</p>	

<p>Previously Developed Land:</p>	<p>Sites 310a, 310b and 460 comprise previously developed land. The proposed development at these three sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 either wholly or partially comprise previously undeveloped land.</p>
<p>The proposed development at these 32 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.</p>	

<p>ALC:</p>	<p>Sites 283, 284, 285, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 627, 628, 629 701, 707 and 708 are wholly or partially situated on ALC Grades 2 and/or 3 land, which are considered to be some of South Staffordshire's BMV land.</p>
<p>Therefore, a minor negative impact would be expected as a result of the proposed development at these 29 sites, due to the loss of this agriculturally important natural resource. Sites 280, 286 and 626 are situated on 'urban' land. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.</p>	

<p>NHS Hospital:</p>	<p>The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Sites 335a, 335b, 479a and 707 are located within the target distance to this hospital.</p>
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	<p>The proposed development at these four sites would be expected to have a minor positive impact on the access of site end users to this essential health facility. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 554, 562/415, 626, 627, 628, 629, 701 and 708 are located outside the target distance to this hospital.</p>
<p>The proposed development at these 31 sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.</p>	

<p>GP Surgery:</p>	<p>The closest GP surgeries are Dale Medical Centre and Gravel Hill Surgery, both located towards the centre of the cluster. Sites 284, 306, 463b, 463c, 463d, 562/415 and 701 are located within the target distance to one of these GP surgeries. The proposed development at these seven sites would be expected to have a minor positive impact on the access of site end users to GP surgeries. Sites 280, 283, 285, 286, 298, 305, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 438, 458, 459, 460, 463a, 477, 479a, 554, 626, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these GP surgeries.</p>
<p>The proposed development at these 28 sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.</p>	

<p>Historic Character:</p>	<p>Sites 280, 285, 286, 298, 305, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 477, 554, 562/415 and 708 are located within an area of high historic value. Sites 283, 284, 306, 309, 463a, 463b, 463c, 463d, 626, 627, 628, 629, 701 and 707 are located within an area of medium historic value.</p>
<p>The proposed development at these 32 sites could potentially have a minor negative impact on historic character.</p>	

<p>Bus Stop:</p>	<p>Sites 284, 335a, 335b, 463a, 463b, 463c, 463d, 479a, 626, 627 and 707 are located within the target distance to bus stops on Church Road, Plantation Lane, Smallbrook Lane, Brickbridge Lane and Bridgnorth Road, providing regular services. The proposed development at these eleven sites would be likely to have a minor positive impact on site end users' access to bus services. Sites 280, 283, 285, 286, 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 477, 554, 562/415, 628, 629, 701 and 708 are located wholly or partially outside the target distance to a bus stop providing regular services.</p>
<p>Therefore, the proposed development at these 24 sites could potentially have a minor negative impact on site end users' access to bus services.</p>	

<p>Railway Station:</p>	<p>The closest railway station is St George's Metro Station, located approximately 8km to the north east of the cluster.</p>
<p>Therefore, the proposed development at the 35 sites in this cluster would be likely to have a minor negative impact on site end users' access to rail services.</p>	

Local Services:	The nearest convenience stores include Costcutter, Sainsbury's and Co-op. Sites 284, 286, 305, 417, 460, 463c, 626 and 701 are located within the target distance to one or more of these convenience stores. Therefore, the proposed development at these eight sites would be expected to have a minor positive impact on site end users' access to local services. Sites 280, 283, 285 , 298, 306, 309, 310a, 310b, 335a, 335b, 416 , 416a, 438, 458, 459, 463a, 463b, 463d, 477, 479a, 554, 562/415, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these convenience stores.
The proposed development at these 27 sites could potentially have a minor negative impact on the access of site end users to local services.	

Primary School:	Wombourne is served by several primary schools, including Blakely Heath Primary School, Westfield Community Primary School, St John's C of E Primary School, St Bernadettes Catholic School and St Benedicts Biscop C of E Primary School. Sites 280, 283, 284, 286, 306, 438, 459, 463a, 463b, 463c, 463d, 477, 562/415, 628, 629 and 701 are located within the target distance to one or more of these primary schools. The proposed development at these 16 sites would be expected to situate new residents in locations with good access to primary education, and therefore, a minor positive impact would be expected. Sites 285 , 298, 305, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 458, 460, 479a, 554, 626, 627, 707 and 708 are located wholly or partially outside the target distance to these primary schools,
and therefore, the proposed development at these 19 sites would be expected to have a minor negative impact on the access of new residents to primary education.	

Access to Employment:	All sites in this cluster are located in or adjacent to areas with 'poor' or 'unreasonable' sustainable access to employment opportunities,
and therefore, the proposed development at these 35 sites would be expected to have a minor negative impact on site end users' access to employment.	

Wombourne Parish Council note in the South Staffordshire Council's site assessment document it is noted that an FRA is required. Due to some significant mapped surface water flooding to the north of site it will need to be assessed and if appropriate mitigation suggested, and that Severn Trent need to be consulted due to foul / sewer connection availability.

The infrastructure concerns with this site are:

General concerns	Site specific concerns
School places	Traffic congestion
Doctors – capacity in numbers and physical space	Rock face damage spilling into gardens of residents in Hellier Drive (See Appendix 3)
Dentists – capacity in NHS places	Flooding
Local Policing teams – capacity to cope with such a large increase of residents	

Site specific concerns – 562 & 415

Site Reference	562 & 415	Village	Wombourne
Minimum capacity	44 dwellings	Address	Land off Poolhouse Road
Site area	1.9 ha	Proposed use	Housing

Wombourne Parish Council acknowledge this site is Safeguarded land, and therefore has already been removed from the Greenbelt.

There are several site-specific concerns in relation to this site, firstly - traffic congestion. To solve this issue, Wombourne Parish Council would like to see a traffic control system in place, for example, traffic lights or an island.

Improving public transport in this area would alleviate some of the traffic issues. At present there are no footpaths, street lighting or bus services in this area meaning elderly and disabled people in particular would be disadvantaged if this site was selected.

Wombourne Parish Council have been informed by residents in Hellier Drive that there was significant rock face damage spilling into gardens as a result of HGV traffic (traffic vibrations) along Poolhouse Road. This is a major concern given the proposed development sites. See Appendix 3 for letter from Staffordshire County Council in relation to closing Bratch Common Road due to traffic vibrations.

Flooding is also a concern, and is a regular occurrence in Poolhouse Road, as can be seen in photographs in Appendix 4. Therefore, whilst Severn Trent may have plans to deal with the infrastructure issues relating to flooding, rain fall is only going to increase as more homes are built.

There are a number of concerns with this site as South Staffordshire Council have identified in their Sustainability Appraisal Document. Where applicable to Wombourne the items are in **bold**:

Views for Local Residents:	The proposed development at Sites 280, 283, 284, 285, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415 , 626, 627, 628, 629, 701, 707 and 708 could potentially alter the views experienced by local residents, including those on Pool House Road, Wood Road and Bridgnorth Road.
Therefore, a minor negative impact on the local landscape would be expected.	

Groundwater SPZ:	Site 438, the majority of Site 280 and a small proportion of Site 298 coincide with the inner zone (Zone I) of a groundwater SPZ. The majority of Site 298 and a proportion of Sites 280, 554 and 708 coincide with the outer zone (Zone II) of a groundwater SPZ. Sites 283, 284, 285, 286, 305, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 479a, 562/415 , 626, 627, 628, 629, 701, 707 and a proportion of Sites 554 and 708 coincide with the catchment (Zone III) of a groundwater SPZ.
The proposed development at these 35 sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.	

Watercourse:	Sites 280, 298, 438 and 626 are located adjacent to the Staffordshire and Worcestershire Canal, and a proportion of Sites 554, 562/415 , 627 and 708 are located within 200m of this watercourse. Sites 284 and 305 are located adjacent to the Wom Brook. A proportion of Sites 306, 460, 463c, 463d and 701 are located within 200m of this watercourse. Sites 310a, 310b, 458 and 460 are located adjacent to the Smestow Brook. Site 417 and a proportion of Sites 285, 305 and 309 are located within 200m of this watercourse. Site 335b and a proportion of Sites 335a and 479a are located within 200m of a minor watercourse.
The proposed development at these 25 sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected.	

Previously Developed Land:	Sites 310a, 310b and 460 comprise previously developed land. The proposed development at these three sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415 , 626, 627, 628, 629, 701, 707 and 708 either wholly or partially comprise previously undeveloped land.
The proposed development at these 32 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.	

ALC:	Sites 283, 284, 285, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415 , 627, 628, 629 701, 707 and 708 are wholly or partially situated on ALC Grades 2 and/or 3 land, which are considered to be some of South Staffordshire's BMV land.
Therefore, a minor negative impact would be expected as a result of the proposed development at these 29 sites, due to the loss of this agriculturally important natural resource. Sites 280, 286 and 626 are situated on 'urban' land. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.	

NHS Hospital:	The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Sites 335a, 335b, 479a and 707 are located within the target distance to this hospital. The proposed development at these four sites would be expected to have a minor positive impact on the access of site end users to this essential health facility. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 554, 562/415 , 626, 627, 628, 629, 701 and 708 are located outside the target distance to this hospital.
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The proposed development at these 31 sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.

Historic Character:	Sites 280, 285, 286, 298, 305, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 477, 554, 562/415 and 708 are located within an area of high historic value. Sites 283, 284, 306, 309, 463a, 463b, 463c, 463d, 626, 627, 628, 629, 701 and 707 are located within an area of medium historic value.
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The proposed development at these 32 sites could potentially have a minor negative impact on historic character.

Bus Stop:	Sites 284, 335a, 335b, 463a, 463b, 463c, 463d, 479a, 626, 627 and 707 are located within the target distance to bus stops on Church Road, Plantation Lane, Smallbrook Lane, Brickbridge Lane and Bridgnorth Road, providing regular services. The proposed development at these eleven sites would be likely to have a minor positive impact on site end users' access to bus services. Sites 280, 283, 285, 286, 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 477, 554, 562/415 , 628, 629, 701 and 708 are located wholly or partially outside the target distance to a bus stop providing regular services.
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Therefore, the proposed development at these 24 sites could potentially have a minor negative impact on site end users' access to bus services.

Railway Station:	The closest railway station is St George's Metro Station, located approximately 8km to the north east of the cluster.
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Therefore, the proposed development at the 35 sites in this cluster would be likely to have a minor negative impact on site end users' access to rail services.

Local Services:	The nearest convenience stores include Costcutter, Sainsbury's and Co-op. Sites 284, 286, 305, 417, 460, 463c, 626 and 701 are located within the target distance to one or more of these convenience stores. Therefore, the proposed development at these eight sites would be expected to have a minor positive impact on site end users' access to local services. Sites 280, 283, 285, 298, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 438, 458, 459, 463a, 463b, 463d, 477, 479a, 554, 562/415 , 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these convenience stores.
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The proposed development at these 27 sites could potentially have a minor negative impact on the access of site end users to local services.

Access to Employment:	All sites in this cluster are located in or adjacent to areas with 'poor' or 'unreasonable' sustainable access to employment opportunities,
and therefore, the proposed development at these 35 sites would be expected to have a minor negative impact on site end users' access to employment.	

The infrastructure concerns with this site are:

General concerns	Site specific concerns
School places	Traffic congestion
Doctors – capacity in numbers and physical space	Rock face damage spilling into gardens of residents in Hellier Drive (See Appendix 3)
Dentists – capacity in NHS places	Flooding
Local Policing teams – capacity to cope with such a large increase of residents	

Site specific concerns - 459

Site Reference	459	Village	Wombourne
Minimum capacity	97 dwellings	Address	Land off Poolhouse Road
Site area	4.6 ha	Proposed use	Housing

Wombourne Parish Council acknowledge this site is Safeguarded land, and therefore has already been removed from the Greenbelt.

There are several site-specific concerns in relation to this site, firstly - traffic congestion. To solve this issue, Wombourne Parish Council would like to see a traffic control system in place, for example, traffic lights or an island.

Improving public transport in this area would alleviate some of the traffic issues. At present there are no footpaths, street lighting or bus services in this area meaning elderly and disabled people in particular would be disadvantaged if this site was selected.

Wombourne Parish Council have been informed by residents in Hellier Drive that there was significant rock face damage spilling into gardens as a result of HGV traffic (traffic vibrations) along Poolhouse Road. This is a major concern given the proposed development sites. See Appendix 3 for letter from Staffordshire County Council in relation to closing Bratch Common Road due to traffic vibrations.

Flooding is also a concern, and is a regular occurrence in Poolhouse Road, as can be seen in photographs in Appendix 4. Therefore, whilst Severn Trent may have plans to deal with the infrastructure issues relating to flooding, rain fall is only going to increase as more homes are built.

There are a number of concerns with this site as South Staffordshire Council have identified in their Sustainability Appraisal Document. Where applicable to Wombourne the items are in **bold**:

Views for Local Residents:	The proposed development at Sites 280, 283, 284, 285, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459 , 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 could potentially alter the views experienced by local residents, including those on Pool House Road, Wood Road and Bridgnorth Road.
Therefore, a minor negative impact on the local landscape would be expected.	

Groundwater SPZ:	Site 438, the majority of Site 280 and a small proportion of Site 298 coincide with the inner zone (Zone I) of a groundwater SPZ. The majority of Site 298 and a proportion of Sites 280, 554 and 708 coincide with the outer zone (Zone II) of a groundwater SPZ. Sites 283, 284, 285, 286, 305, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 458, 459 , 460, 463a, 463b, 463c, 463d, 477, 479a, 562/415, 626, 627, 628, 629, 701, 707 and a proportion of Sites 554 and 708 coincide with the catchment (Zone III) of a groundwater SPZ.
The proposed development at these 35 sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.	

Previously Developed Land:	Sites 310a, 310b and 460 comprise previously developed land. The proposed development at these three sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459 , 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 either wholly or partially comprise previously undeveloped land.
The proposed development at these 32 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.	

ALC:	Sites 283, 284, 285, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459 , 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 627, 628, 629 701, 707 and 708 are wholly or partially situated on ALC Grades 2 and/or 3 land, which are considered to be some of South Staffordshire's BMV land.
Therefore, a minor negative impact would be expected as a result of the proposed development at these 29 sites, due to the loss of this agriculturally important natural resource. Sites 280, 286 and 626 are situated on 'urban' land. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.	

NHS Hospital:	The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Sites 335a, 335b, 479a and 707 are located within the target distance to this hospital. The proposed development at these four sites would be expected to have a minor positive impact on the access of site end users to this essential health facility. Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459 , 460, 463a, 463b, 463c, 463d, 477, 554, 562/415, 626, 627, 628, 629, 701 and 708 are located outside the target distance to this hospital.
The proposed development at these 31 sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.	

GP Surgery:	The closest GP surgeries are Dale Medical Centre and Gravel Hill Surgery, both located towards the centre of the cluster. Sites 284, 306, 463b, 463c, 463d, 562/415 and 701 are located within the target distance to one of these GP surgeries. The proposed development at these seven sites would be expected to have a minor positive impact on the access of site end users to GP surgeries. Sites 280, 283, 285, 286, 298, 305, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 438, 458, 459 , 460, 463a, 477, 479a, 554, 626, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these GP surgeries.
The proposed development at these 28 sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.	

Historic Character:	Sites 280, 285, 286, 298, 305, 310a, 310b, 416, 416a, 417, 438, 458, 459 , 460, 477, 554, 562/415 and 708 are located within an area of high historic value. Sites 283, 284, 306, 309, 463a, 463b, 463c, 463d, 626, 627, 628, 629, 701 and 707 are located within an area of medium historic value.
The proposed development at these 32 sites could potentially have a minor negative impact on historic character.	

Bus Stop:	Sites 284, 335a, 335b, 463a, 463b, 463c, 463d, 479a, 626, 627 and 707 are located within the target distance to bus stops on Church Road, Plantation Lane, Smallbrook Lane, Brickbridge Lane and Bridgnorth Road, providing regular services. The proposed development at these eleven sites would be likely to have a minor positive impact on site end users' access to bus services. Sites 280, 283, 285, 286, 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459 , 460, 477, 554, 562/415, 628, 629, 701 and 708 are located wholly or partially outside the target distance to a bus stop providing regular services.
Therefore, the proposed development at these 24 sites could potentially have a minor negative impact on site end users' access to bus services.	

Railway Station:	The closest railway station is St George's Metro Station, located approximately 8km to the north east of the cluster.
Therefore, the proposed development at the 35 sites in this cluster would be likely to have a minor negative impact on site end users' access to rail services.	

Local Services:	The nearest convenience stores include Costcutter, Sainsbury's and Co-op. Sites 284, 286, 305, 417, 460, 463c, 626 and 701 are located within the target distance to one or more of these convenience stores. Therefore, the proposed development at these eight sites would be expected to have a minor positive impact on site end users' access to local services. Sites 280, 283, 285, 298, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 438, 458, 459 , 463a, 463b, 463d, 477, 479a, 554, 562/415, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these convenience stores.
The proposed development at these 27 sites could potentially have a minor negative impact on the access of site end users to local services.	

Access to Employment:	All sites in this cluster are located in or adjacent to areas with 'poor' or 'unreasonable' sustainable access to employment opportunities,
and therefore, the proposed development at these 35 sites would be expected to have a minor negative impact on site end users' access to employment.	

Wombourne Parish Council note from South Staffordshire Council's site assessment that an FRA will be required and that you need to consult with Severn Trent Water Plc regarding foul / sewer connection availability and point of connection/capacity.

The infrastructure concerns with this site are:

General concerns	Site specific concerns
School places	Traffic congestion
Doctors – capacity in numbers and physical space	Rock face damage spilling into gardens of residents in Hellier Drive (See Appendix 3)
Dentists – capacity in NHS places	Flooding
Local Policing teams – capacity to cope with such a large increase of residents	

Site specific concerns – 463 & 284

Site Reference	463 & 284	Village	Wombourne
Minimum capacity	223 dwellings	Address	Land off Billy Buns Lane & Gilbert Lane
Site area	10.6a ha	Proposed use	Housing

Wombourne Parish Council strongly object to the development of these sites. These sites are the gateway to Wombourne Village. It has huge historical significance to the village, and should remain in its current state.

These 4 sites (284, 463b, c and d) are unsuitable given identified brown field land elsewhere and full consideration should be given to a buffer between the village and A449.

Material planning concerns

Surrounding areas

- Dominating surrounding buildings – the village hall and other elements of the conservation area would be significantly dominated by any development particularly on site 284.
- Visually damaging in the landscape or in the setting – woodland and the surviving hedgerows still make an important contribution to the character of the village
- Conflict with the character of the area
- Environmental damage caused by vehicles
- Better alternative sites available - 310a and 310b

Site considerations

- Risk of flooding or creation of flood risk – this area is already prone to significant flooding as has been demonstrated in images in Appendix 4.
- Destroying traditional field patterns – historic hedgerow would have to be removed in order for these sites to be developed
- Loss of important wildlife habitats – the removal of historic hedgerow would inevitably result in the loss of wildlife habitats
- Insufficient amenity land – additional amenity land should be sought, 284 is preferred
- Not in keeping with the street scene – any development on this site would result in buildings that would certainly be out of keeping with the street scene

Special designations

- Damage to historic or architectural value of Listed Building – specifically in reference to Smallbrook Farm and it's historic links to the Wodehouse Estate.
- Increase of traffic within the conservation area

Wombourne Parish Council notes that you consider this land to be sitting in moderate high sensitivity compared to the rest of Wombourne, and you note that it is in the lower Green Belt harm than the majority of Wombourne, and would strongly oppose this suggestion.

Wombourne Parish Council notes that you agree with this broadly, given your SA findings state ‘major negative effects are predicted against the landscape criteria, due to the site’s landscape sensitivity’¹.

It is also noted that you see this site’s proximity to the village centre as a positive, however, Wombourne Parish Council would urge you to consider the huge impact this will have on an already over stretched village centre from a traffic flow point of view. There is no solution to the already huge traffic issues around the centre of the village, serving bus routes from Wolverhampton to Stourbridge, it is almost a daily occurrence that the whole village comes to a standstill, the additional pressure from the traffic from this site will have huge implications on this.

There are a number of concerns with this site as South Staffordshire Council have identified in their Sustainability Appraisal Document. Where applicable to Wombourne the items are in **bold**:

Climate change adaption: Major negative

The size, nature and location of a development proposal would be likely to:

- Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance;
- Cause a very high-quality receptor to be permanently diminished;
- Be unable to be entirely mitigated;
- Be discordant with the existing setting; and/or
- Contribute to a cumulative significant effect.

Landscape and Townscape: Major negative (both 463 a-d and 284)

The size, nature and location of a development proposal would be likely to:

- Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance;
- Cause a very high-quality receptor to be permanently diminished;
- Be unable to be entirely mitigated;
- Be discordant with the existing setting; and/or
- Contribute to a cumulative significant effect.

Fluvial Flooding:	Sites 280, 284 , 310b, 438, 458 and 460 are located partially within Flood Zones 2 and 3. The proposed development at these six sites could potentially locate some site end users in areas at risk of fluvial flooding,
and therefore, a minor negative impact would be expected	

Surface Water Flooding:	A proportion of Sites 280, 283, 284 , 285, 309, 310a, 459 and 554 coincide with areas determined to be at low, medium and high risk of surface water flooding.
The proposed development at these eight sites would be expected to have a major negative impact on pluvial flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations.	

Ancient Woodland:	Sites 416 and 416a are located within approximately 80m from 'Ladywell Wood' ancient woodland whilst Site 708 is located within 250 from the ancient woodland. Sites 280, 438, 463a, 463b, 463c and 463d are located within approximately 500m from this ancient woodland.
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The proposed development at these nine sites could potentially have a minor negative impact on these ancient woodlands, due to an increased risk of disturbance.

Green Belt Harm:	The release of Green Belt land at Site 463a is considered by the Green Belt Study to result in 'very high' levels of harm to the purposes of the Green Belt. Development of Sites 283, 306, 309, 416a, 626, 627, 628, 629, 701, 707 and 708 could cause 'moderate-high' levels of harm to the purposes of the Green Belt.
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Therefore, development of these 12 sites is assessed as having a potentially major negative impact.

Green Belt Harm:	Development of Sites 286, 335b, 458, 477, 479a and 554 are considered to result in 'moderate' harm to the Green Belt purposes. Development of Sites 284, 298, 310a, 310b, 438, 463b, 463c and 463d would be expected to result in 'low-moderate' harm to the purposes of the Green Belt. Development of these 14 sites is assessed as having a minor negative impact Landscape Sensitivity: Sites 284, 306, 310a, 463a, 463b, 463c, 463d and 701 are considered by the Landscape Sensitivity Study to be within an area of 'moderate-high' landscape sensitivity.
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The proposed development at these eight sites have been assessed as having a potentially major negative impact.

Landscape Character:	Sites 283, 298, 306, 335a, 335b, 416, 416a, 479a, 626, 627, 628, 629, 701, 707 and 708 are located within the RCA 'Mid Severn Sandstone Plateau' and the LCT 'Sandstone Estatelands'. The characteristic landscape features of this LCT are "estate plantations; heathy ridge woodlands; hedgerow oaks; well treed stream valleys; smooth rolling landform with scarp slopes; red brick farmsteads and estate cottages; mixed intensive arable and pasture farming; large hedged fields; halls and associated parkland; [and] canal". SA of SSDC Preferred Option Plan – Appendix B August 2021 LC-590_Appendix_B_RA Sites_18_240821RI.docx © Lepus Consulting for South Staffordshire Council B245 B.28.4.8 Sites 458, 459, 463a, 463b, 463c, 463d , 477, 554 and 562/415 are located within the RCA 'Cannock Chase and Cankwood' and the LCT 'Sandstone Hills and Heaths'. The characteristic landscape features of this LCT are "small winding lanes; irregular hedged field pattern; stunted hedgerow oaks; [and] pronounced rounded landform".
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The proposed residential development at these 24 sites could potentially be discordant with the key characteristics of the associated LCTs. Therefore, a minor negative impact on the local landscape character would be expected.

Views from the PRow Network:	Sites 280, 458 and 708 coincide with a PRow, Sites 285, 306, 309, 416, 416a, 459, 463a , 477, 554, 627, 628 and 629 are located adjacent to or in close proximity to several PRowWs.
The proposed development at these 15 sites could potentially alter the views experienced by users of these footpaths. As a result, a minor negative impact on the local landscape would be expected.	

Views for Local Residents:	The proposed development at Sites 280, 283, 284 , 285, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 could potentially alter the views experienced by local residents, including those on Pool House Road, Wood Road and Bridgnorth Road.
Therefore, a minor negative impact on the local landscape would be expected.	

Urbanisation of the Countryside:	Sites 283, 284 , 285, 298, 309, 416, 438, 458, 459, 463a, 463b, 463d, 477, 554, 626, 627, 628, 629, 707 and 708 are located in the open countryside surrounding Wombourne. The proposed development at these 20 sites would be likely to contribute towards urbanisation of the surrounding countryside and
therefore, have a minor negative impact on the local landscape.	

Pollution & Waste	Main Road: The A449 passes to the east of Wombourne. Sites 463d and 701 are located adjacent to this road. Site 284 and a proportion of Sites 306, 463b and 463c are located within 200m of this road.
The proposed development at these six sites could potentially expose some site end users to higher levels of transport associated air and noise pollution. Traffic using the A449 would be expected to have a minor negative impact on air quality and noise at these sites.	

Groundwater SPZ:	Site 438, the majority of Site 280 and a small proportion of Site 298 coincide with the inner zone (Zone I) of a groundwater SPZ. The majority of Site 298 and a proportion of Sites 280, 554 and 708 coincide with the outer zone (Zone II) of a groundwater SPZ. Sites 283, 284 , 285, 286, 305, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 458, 459, 460, 463a , 463b , 463c , 463d , 477, 479a, 562/415, 626, 627, 628, 629, 701, 707 and a proportion of Sites 554 and 708 coincide with the catchment (Zone III) of a groundwater SPZ.
The proposed development at these 35 sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.	

Watercourse:	Sites 280, 298, 438 and 626 are located adjacent to the Staffordshire and Worcestershire Canal, and a proportion of Sites 554, 562/415, 627 and 708 are located within 200m of this watercourse. Sites 284 and 305 are located adjacent to the Wom Brook. A proportion of Sites 306, 460, 463c, 463d and 701 are located within 200m of this watercourse. Sites 310a, 310b, 458 and 460 are located adjacent to the Smestow Brook. Site 417 and a proportion of Sites 285, 305 and 309 are located within 200m of this watercourse. Site 335b and a proportion of Sites 335a and 479a are located within 200m of a minor watercourse.
The proposed development at these 25 sites could potentially increase the risk of contamination of these watercourses, and therefore, a minor negative impact would be expected	

Previously Developed Land:	Sites 310a, 310b and 460 comprise previously developed land. The proposed development at these three sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected. Sites 280, 283, 284 , 285, 286, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d , 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 either wholly or partially comprise previously undeveloped land.
The proposed development at these 32 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.	

ALC:	Sites 283, 284 , 285, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d , 477, 479a, 554, 562/415, 627, 628, 629 701, 707 and 708 are wholly or partially situated on ALC Grades 2 and/or 3 land, which are considered to be some of South Staffordshire's BMV land.
Therefore, a minor negative impact would be expected as a result of the proposed development at these 29 sites, due to the loss of this agriculturally important natural resource. Sites 280, 286 and 626 are situated on 'urban' land. Therefore, a minor positive impact would be expected at these three sites, as the proposed development would be likely to help prevent the loss of BMV land across the Plan area.	

NHS Hospital:	The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Sites 335a, 335b, 479a and 707 are located within the target distance to this hospital. The proposed development at these four sites would be expected to have a minor positive impact on the access of site end users to this essential health facility. Sites 280, 283, 284 , 285, 286, 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 463a, 463b, 463c, 463d , 477, 554, 562/415, 626, 627, 628, 629, 701 and 708 are located outside the target distance to this hospital.
The proposed development at these 31 sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.	

Main Road:	Sites 284 , 306, 463b , 463c , 463d and 701 are located wholly or partially within 200m of the A449.
The proposed development at these six sites could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.	
Conservation Area:	Sites 284 is located adjacent to 'Wombourne' Conservation Area.
The proposed development at this site could potentially alter the setting of this Conservation Area and, as a result, have a minor negative impact on the historic environment.	
Archaeology:	Site 280 coincides with the archaeological feature 'The Bratch Water Pumping Station, Bratch Lane, Wombourne'. Site 283 coincides with 'Greensforge to Pennocrucium Roman Road (Greensforge Part)'. Site 284 coincides with 'Roman Coin, Battlefield Hill, Wombourne'. Sites 310a and 310b coincide with 'Site of possible Water Meadow, North of Smestow Bridge, Trysull'. Site 463a coincides with 'Flint Objects, Smallbrook Farm'. Site 477 coincides with 'Clapgate Cottage, Woodford Lane, Trysull'. Site 479a coincides with 'Windmill, Himley'. Sites 298, 305, 309, 335b, 417, 438, 458, 460, 463c , 463d , 626, 627, 628, 629, 707 and 708 are located adjacent to various archaeological features.
The proposed development at these 24 sites could potentially alter the significance of these archaeological features, and as such, have a minor negative impact on the historic environment.	
Historic Character:	Sites 280, 285, 286, 298, 305, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 477, 554, 562/415 and 708 are located within an area of high historic value. Sites 283, 284 , 306, 309, 463a , 463b , 463c , 463d , 626, 627, 628, 629, 701 and 707 are located within an area of medium historic value.
The proposed development at these 32 sites could potentially have a minor negative impact on historic character.	
Railway Station:	The closest railway station is St George's Metro Station, located approximately 8km to the north east of the cluster.
Therefore, the proposed development at the 35 sites in this cluster would be likely to have a minor negative impact on site end users' access to rail services.	
Pedestrian Access:	Sites 280, 283, 284, 285, 286, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 458, 459, 460, 463a, 463b, 463d, 479a, 554, 562/415, 627, 628, 701, 707 and 708 are well connected to the existing footpath network. The proposed development at these 27 sites would be expected to have a minor positive impact on site end users' opportunities to travel by foot. Sites 298, 305, 417, 438, 463c , 477, 626 and 629 currently have poor access to the surrounding footpath network.
The proposed development at these eight sites could potentially have a minor negative impact on local accessibility.	

Local Services:	The nearest convenience stores include Costcutter, Sainsbury's and Co-op. Sites 284, 286, 305, 417, 460, 463c, 626 and 701 are located within the target distance to one or more of these convenience stores. Therefore, the proposed development at these eight sites would be expected to have a minor positive impact on site end users' access to local services. Sites 280, 283, 285, 298, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 438, 458, 459, 463a, 463b, 463d , 477, 479a, 554, 562/415, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these convenience stores.
The proposed development at these 27 sites could potentially have a minor negative impact on the access of site end users to local services.	

Access to Employment:	All sites in this cluster are located in or adjacent to areas with 'poor' or 'unreasonable' sustainable access to employment opportunities,
and therefore, the proposed development at these 35 sites would be expected to have a minor negative impact on site end users' access to employment.	

The infrastructure concerns with this site are:

General concerns	Site specific concerns
School places	No defensible boundary
Doctors – capacity in numbers and physical space	Traffic congestion
Dentists – capacity in NHS places	Flooding
Local Policing teams – capacity to cope with such a large increase of residents	Long standing historical interest

Site specific concerns – 286

Site Reference	286	Village	Wombourne
Minimum capacity	16 dwellings	Address	Land adj. 63 Sytch Lane
Site area	0.6 ha	Proposed use	Housing

Wombourne Parish Council acknowledge that South Staffordshire Council see this area as greater landscape sensitivity than the majority of land around Wombourne. South Staffordshire Council note that it sits in a moderate high sensitivity, however, despite this it has been graded as an area of lower Green Belt harm than the majority of land around Wombourne, sitting in an area of low moderate harm.

There are a number of concerns with this site as South Staffordshire Council have identified in their Sustainability Appraisal Document. Where applicable to Wombourne the items are in **bold**:

Landscape	Sites 286 , 335b, 438, 707 and 708 are assessed as being within an area of ‘moderate’ landscape sensitivity. Additionally, Sites 283, 298, 309, 310b, 417, 458, 477, 479a, 554, 626, 627, 628, 629 and a small proportion of 286 are assessed as being within an area of ‘low/moderate’ landscape sensitivity.
Development at these 18 sites have been assessed as having a potentially minor negative impact.	

Groundwater SPZ:	Site 438, the majority of Site 280 and a small proportion of Site 298 coincide with the inner zone (Zone I) of a groundwater SPZ. The majority of Site 298 and a proportion of Sites 280, 554 and 708 coincide with the outer zone (Zone II) of a groundwater SPZ. Sites 283, 284, 285, 286 , 305, 306, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 479a, 562/415, 626, 627, 628, 629, 701, 707 and a proportion of Sites 554 and 708 coincide with the catchment (Zone III) of a groundwater SPZ.
The proposed development at these 35 sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.	

Previously Developed Land:	Sites 310a, 310b and 460 comprise previously developed land. The proposed development at these three sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected. Sites 280, 283, 284, 285, 286 , 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 either wholly or partially comprise previously undeveloped land.
The proposed development at these 32 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.	

NHS Hospital:	The closest NHS hospital with an A&E department is Russells Hall Hospital, located to the south east of the cluster. Sites 335a, 335b, 479a and 707 are located within the target distance to this hospital. The proposed development at these four sites would be expected to have a minor positive impact on the access of site end users to this essential health facility. Sites 280, 283, 284, 285, 286 , 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 463a, 463b, 463c, 463d, 477, 554, 562/415, 626, 627, 628, 629, 701 and 708 are located outside the target distance to this hospital.
The proposed development at these 31 sites could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.	

GP Surgery:	The closest GP surgeries are Dale Medical Centre and Gravel Hill Surgery, both located towards the centre of the cluster. Sites 284, 306, 463b, 463c, 463d, 562/415 and 701 are located within the target distance to one of these GP surgeries. The proposed development at these seven sites would be expected to have a minor positive impact on the access of site end users to GP surgeries. Sites 280, 283, 285, 286 , 298, 305, 309, 310a, 310b, 335a, 335b, 416, 416a, 417, 438, 458, 459, 460, 463a, 477, 479a, 554, 626, 627, 628, 629, 707 and 708 are located wholly or partially outside the target distance to these GP surgeries.
The proposed development at these 28 sites would be expected to have a minor negative impact on the access of site end users to GP surgeries.	

Historic Character:	Sites 280, 285, 286 , 298, 305, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 477, 554, 562/415 and 708 are located within an area of high historic value. Sites 283, 284, 306, 309, 463a, 463b, 463c, 463d, 626, 627, 628, 629, 701 and 707 are located within an area of medium historic value.
The proposed development at these 32 sites could potentially have a minor negative impact on historic character.	

Bus Stop:	Sites 284, 335a, 335b, 463a, 463b, 463c, 463d, 479a, 626, 627 and 707 are located within the target distance to bus stops on Church Road, Plantation Lane, Smallbrook Lane, Brickbridge Lane and Bridgnorth Road, providing regular services. The proposed development at these eleven sites would be likely to have a minor positive impact on site end users' access to bus services. Sites 280, 283, 285, 286 , 298, 305, 306, 309, 310a, 310b, 416, 416a, 417, 438, 458, 459, 460, 477, 554, 562/415, 628, 629, 701 and 708 are located wholly or partially outside the target distance to a bus stop providing regular services.
Therefore, the proposed development at these 24 sites could potentially have a minor negative impact on site end users' access to bus services.	

Railway Station:	The closest railway station is St George's Metro Station, located approximately 8km to the north east of the cluster.
Therefore, the proposed development at the 35 sites in this cluster would be likely to have a minor negative impact on site end users' access to rail services.	

Access to Employment:	All sites in this cluster are located in or adjacent to areas with 'poor' or 'unreasonable' sustainable access to employment opportunities,
and therefore, the proposed development at these 35 sites would be expected to have a minor negative impact on site end users' access to employment.	

The infrastructure concerns with this site are:

General concerns	Site specific concerns
School places	Traffic congestion
Doctors – capacity in numbers and physical space	Possible migration of estates from Bridgnorth Road making one continuous estate
Dentists – capacity in NHS places	Impact on cemetery
Local Policing teams – capacity to cope with such a large increase of residents	

Alternative options

Wombourne Parish Council would strongly urge South Staffordshire Council to re-explore the Copart site, which has not been included in this consultation.

Wombourne Parish Council notes that South Staffordshire Council have considered these sites, and note they are both on existing employment sites of 'other' quality in the Council's Economic Development Needs Assessment.

Wombourne Parish Council acknowledge site 310b occupiers have not indicated an intention to relocate their businesses, therefore allocating the land for housing may result in a loss of employment units without any likely substitute in the District or surrounding area.

In contrast, the occupier of site 310a has indicated they may be able to relocate the business during the plan period, meaning that the land may become available without displacing the existing employer although a final site relocate to has not been confirmed at this stage. The Highways Authority has also indicated initial concerns that access may not be achievable to the sites in question, and the sites do not have the same major positive Sustainability Appraisal impacts or proximity to village centre services as one the proposed site (Gilbert Lane).

Wombourne Parish Council note that South Staffordshire Council have concerns over the lack of proximity to the village centre. However, South Staffordshire Council have put forward planning permission to build a Lidl supermarket just a few seconds from the site. In addition, there is also an existing Sainsburys Supermarket along the same road. Residents living on this site would be travelling no more than 2 or 3 minutes longer by car to the village centre than those living on sites 459 and 562 / 415.

Wombourne Parish Council note the concerns raised by County Highways were amber 'Initial concerns with impacts on surrounding highway network or that access is not achievable', rather than red 'strong initial concerns with impacts on surrounded highway network or that access is not achievable'. Therefore, Wombourne Parish Council would urge South Staffordshire Council not to use the amber rating as a reason not to press forward with these brown field sites. The Parish Council would also like to remind South Staffordshire Council that they put forward development of a Lidl supermarket just a few seconds down the same road.

Previously Developed Land: Sites **310a, 310b** and 460 comprise previously developed land. **The proposed development at these three sites would be classed as an efficient use of land, and therefore, a minor positive impact on natural resources would be expected.** Sites 280, 283, 284, 285, 286, 298, 305, 306, 309, 335a, 335b, 416, 416a, 417, 438, 458, 459, 463a, 463b, 463c, 463d, 477, 479a, 554, 562/415, 626, 627, 628, 629, 701, 707 and 708 either wholly or partially comprise previously undeveloped land. The proposed development at these 32 sites would be likely to result in a minor negative impact on natural resources, due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

Conclusion

Given the body of evidence presented, Wombourne Parish Council would ask South Staffordshire Council to re-consider the actual need for the additional housing from GBHMA.

Wombourne Parish Council are extremely concerned about the lack of sufficient infrastructure to support all of the proposed developments in the Local Plan. In particular, Wombourne Parish Council are concerned about the development of sites 463 & 284 and what this would mean for the aspect of the village. The image of the village as it is known today would no longer exist.

As outlined in the introduction Wombourne Parish Council would like to see more emphasis on truly affordable homes for the next generation of Wombourne residents. Wombourne Parish Council supports the South Staffordshire Council's approach to Sustainable Development SPD.

Wombourne Parish Council would strongly urge South Staffordshire Council to re-consider development on the largest brown field site in South Staffordshire, 310a and 310b.

Appendix 1 – GP Surgery Consultation

Consultation with GP surgeries

Questions asked by Wombourne Parish Council	Answers from Gravel Hill Surgery
Number of patients currently registered at the practice	We have 8207 patients currently registered at Gravel Hill Surgery.
Any strategic plans that you are aware of to either expand or reduce patient number capacity between now and beyond.	<p>We have no plans to reduce patient number capacity. We have no plans to actively seek to increase patient number capacity - our list size is steadily increasing due to new housing developments and patients living within our catchment area wishing to join us.</p> <p>We cannot cap or close our list, therefore we have no control over our increasing list size as the new housing developments are within our catchment area.</p>
What additional support, if any, you would require to service the proposed number of new homes, as set out in South Staffordshire Councils Local Plan.	<p>With the proposed new developments, we would be looking for financial support to fund an extension to our premises. We are extremely tight for room space, to the point where sometimes we have clinicians working from home as we do not have the rooms available. This makes face to face consultations difficult and juggling between clinicians and rooms is a daily occurrence.</p>
Any other information that you feel may be relevant.	<p>With increased patient numbers, we will need to recruit more clinical staff members and the issue of room space will become even more complex. We have an Advanced Nurse Practitioner joining us in January and are currently recruiting for a salaried GP in anticipation of our increasing patient list size. Recruitment of a GP is not a quick process.</p> <p>We have community service providers who wish to use our rooms for services such as community ultrasound and community dermatology clinics but due to lack of room space we cannot always accommodate their requests. Allowing community teams to use our rooms does have a positive impact on the patients in that they do not have to travel to hospital to be seen for their appointment.</p>

Questions asked by Wombourne Parish Council	Answers from Dale Medical Practice
Number of patients currently registered at the practice	6500
Any strategic plans that you are aware of to either expand or reduce patient number capacity between now and beyond.	The practice list is open. We could accommodate more patients.
What additional support, if any, you would require to service the proposed number of new homes, as set out in South Staffordshire Councils Local Plan.	Problem is recruitment and space. We have tried to recruit GPs since May and have not had any success yet. This is a national problem. We do have potential to extend but would need funding. The premises are not owned by the NHS.
Any other information that you feel may be relevant.	N/A

Appendix 2 – School Consultation

Consultation with Schools

Questions asked by Wombourne Parish Council	Answers from Blakeley Heath Primary School
Published admission numbers at 2020/2021.	We currently have a pupil admission number of 50 children per year group. In September 2020 we admitted 37 children in reception. In September 2021 we admitted 53 children in reception.
Any strategic plans that you are aware of to either expand or reduce admission numbers now or in the future.	Our governing body has liaised with the local authority to increase our pupil admission number to 60 children. If this is improved it will be from September 2023.
What additional support, if any, you would require to service the proposed number of new homes, as set out in South Staffordshire Councils Local Plan.	We have seen an increase in our pupil numbers over the last few years meaning that we currently only have one spare classroom. I believe that from September 2022 we will have two forms in each year group, resulting in no spare teaching spaces. We could accommodate smaller numbers of pupils in certain year groups but if additional classes were required then we would need mobiles or additional classrooms being built.
Any other information that you feel may be relevant.	<p>Our governor run nursery is currently oversubscribed and we can not always accommodate parents requests for additional hours.</p> <p>We have 338 pupils on role (reception to year 6) which suggests we have 12 spaces available from our 350 places, although it is not as simple as this due to discrepancies in cohorts.</p> <p>Currently reception, year 3, year 4 and year 5 are over our current admission number of 50. Whilst year 2 has 11 places available before reaching our admission number of 50.</p> <p>I know the local authority use a formula to calculate the potential number of school places required from the number of houses proposed.</p>

Questions asked by Wombourne Parish Council	Answers from St Benedict Biscop CE Primary School
Published admission numbers at 2020/2021.	Our PAN is 30 and we have no plans currently to change this number.
Any strategic plans that you are aware of to either expand or reduce admission numbers now or in the future.	We currently have spaces in some year groups across the school so would be able to accommodate some children as a result of new housing in the local area. We currently have 30 places across the school from nursery to Year 6.
What additional support, if any, you would require to service the proposed number of new homes, as set out in South Staffordshire Councils Local Plan.	N/A
Any other information that you feel may be relevant.	N/A

Questions asked by Wombourne Parish Council	Answers from Wombourne High School
Published admission numbers at 2020/2021.	Published admission number is 192 and has been for a number of years
Any strategic plans that you are aware of to either expand or reduce admission numbers now or in the future.	We have no current plans to change our PAN
What additional support, if any, you would require to service the proposed number of new homes, as set out in South Staffordshire Councils Local Plan.	The number on roll in most year groups is lower than PAN so we could take additional students if requested to do so by the LA over the next few years until we reach the maximum numbers allowed
Any other information that you feel may be relevant.	If asked by the LA to do so and the school has space and teachers are happy to take additional students, we would, but class size, teaching spaces and availability of teaching staff is always considered

No response was received from the other schools at the time of preparing this document.

Appendix 3 – Landslip

Landslide in Hellier Drive as a result of HGV/construction traffic – consideration re sites 285 / 562 / 415 / 459.

A resident who lives in Hellier Drive has informed Wombourne Parish Council that representatives from the County Council came out to do checks and tests on the rock, no decisions or further action was taken.

‘Evidence was gained that the extra traffic and work being undertaken with large vehicles using the road, resulted in vibrations causing the landslide.’

Extra housing and heavy vehicles from construction works will almost certainly result in further tremors and the fear of us once again being faced with this disaster in our gardens!’



Please see the next two pages for additional evidence to support this.



FAO OWNER/OCCUPIER
CLAPGATE COTTAGE WOODFORD LANE
TRYSULL
WOLVERHAMPTON
WV5 8DB

Highways
Strategic Highway Management
Staffordshire County Council
Wedgwood Building
Block A
Tipping Street
Stafford
ST16 2DH
Telephone: 0300 111 8000
Email: highways@staffordshire.gov.uk
Please ask for: John Parkes

Our Ref:
JP/TM/D4116/CDT6562/BCR

Date:
15 January 2013

Dear Sir/Madam,

PROPOSAL TO CONSIDER THE IMPLEMENTATION OF A PROHIBITION OF DRIVING TRAFFIC REGULATION ORDER – BRATCH COMMON ROAD, WOMBOURNE

I am writing to you today to ask for your opinion in connection with a proposal to address an issue concerning the use of motor vehicles along part of Bratch Common Road, Wombourne.

The issue relates specifically to a section of Bratch Common Road where there have been incidents of subsidence which has affected parts of the sandstone face that runs adjacent to the carriageway.

Although these landslips have had no affect on the integrity of the highway they have raised concern for residents who have properties bordering the rock face. As a consequence County Councillor Robert Reade has requested that we investigate the possibility of restricting vehicular traffic along a section of Bratch Common Road in an effort to limit the vibration which could possibly contribute to further degradation.

The proposal will therefore look to prohibit access to all motor vehicles with the exemption of those requiring access to carry out maintenance work and emergency services from a point approximately 110m south of the junction with Tree Tops through to the property boundary of 27a Bratch Common Road, a distance of approximately 210m.

In order to enforce this prohibition and prevent unnecessary vehicular access the intention will be to construct two turning heads at each end of the restricted section of carriageway. One of these turning heads will have removable bollards to allow access for service vehicles.

A drawing of the proposal which should help to illustrate the scheme in more detail has been enclosed (CDT6562/R01/01).

Also enclosed is a response slip to record your support for the scheme and any comments you might have. I would therefore appreciate it if you could respond to the above proposal by **Thursday 07 February 2013**.

Thank you for considering this matter and I look forward to reading any comments you might have.

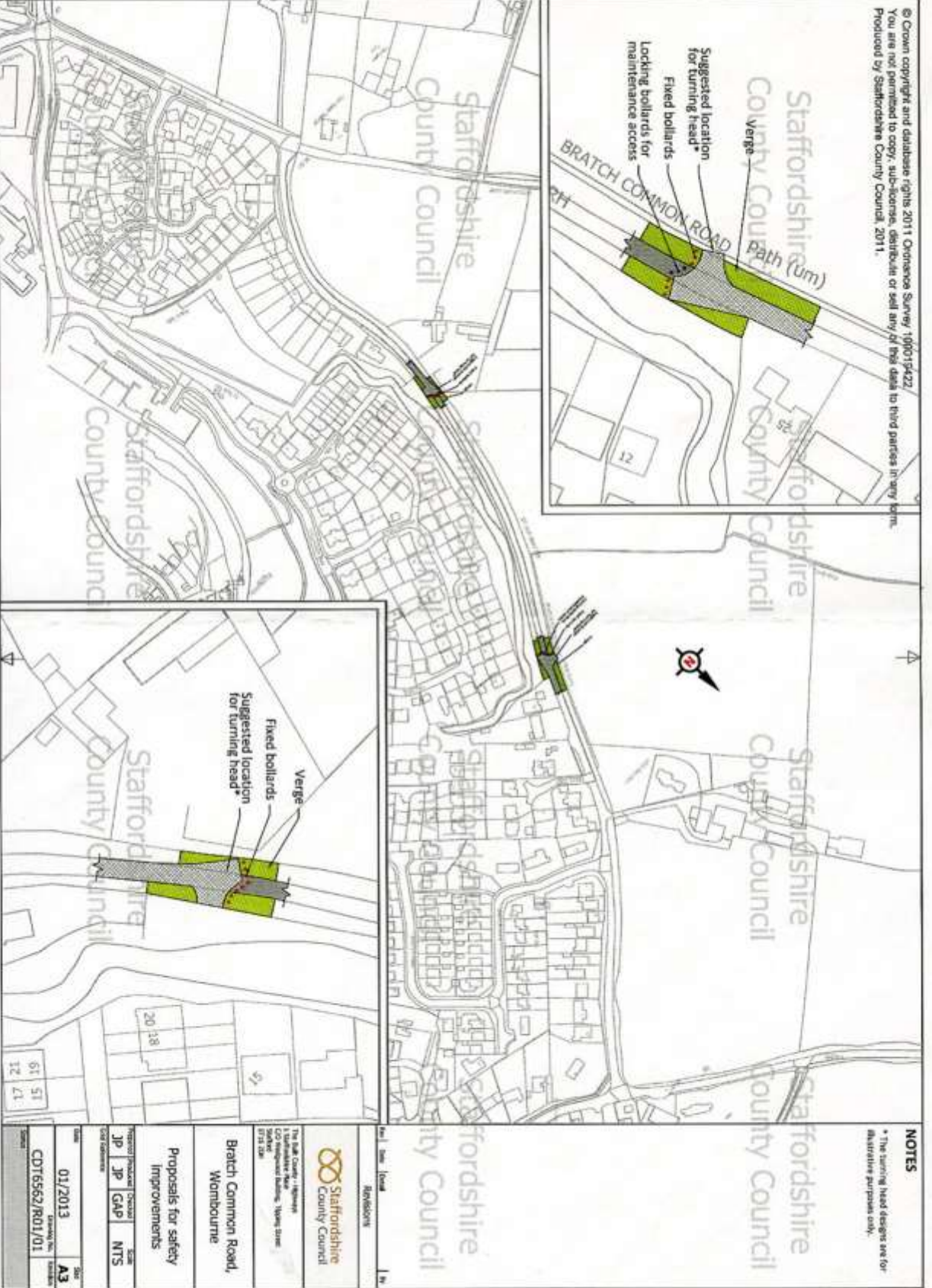
Yours Sincerely

John Parkes
Engineer
Staffordshire County Council

the knot unites



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 Produced by Staffordshire County Council, 2011.



NOTES
 * The turning head designs are for illustrative purposes only.

Revision
 1
 Staffordshire County Council
 The Local Council is responsible for:
 1. Transport and Road
 2. Highways
 3. Local Road Traffic Signs, Traffic Signs
 4. Traffic Signs
 5. Traffic Signs

Bratch Common Road,
 Wombourne

Proposals for safety
 Improvements

Prepared by: JP
 Checked by: JP
 Date: NTS

DATE	01/2013	SCALE	A3
DRAWING NO.	CDT6562/R01/01	STATUS	Issue

Appendix 4 – Flooding

These photographs show flooding is already a regular occurrence around sites 463/284.



These photographs show flooding is already a regular occurrence around sites 459 / 562/415 / 285.



These photographs show flooding in Rookery Road (Battlefield Hill end).

This route is an undesirable bypass of the village centre.



Appendix 5 - Traffic

These photographs show traffic congestion and parking issues outside St Benedict Biscop CE Primary School and St Bernadettes Catholic Primary School.

This issue is only going to be exacerbated when there is more demand on school places.



Appendix 6 - Wildlife

These photographs show examples of wildlife in the village which may be affected by the developments.



Appendix 7 – Views of children in Wombourne

These letters are from children who attend St Bernadette's Catholic Primary School.

Dear Wombourne Parish Council, I'm a Y3 Pupil at St. Bernadette's Catholic Primary School in Wombourne. I think it's a bad idea building 223 houses on Wombourne's green belt.

Firstly, because building houses on our green belt just kills local wildlife and spoils the countryside.

Are you thinking about us youngsters? We're going to be here longer than you!

In my class alone, not one person actually wants houses built on our green belt.

Also, where are all these people going to go? The doctors, dentist, etc are already full!

Others may think that it's a good idea building 223 houses in Wombourne but it's really isn't. They might think it's a good idea because more people will get a place to live.

To sum up, I still disagree building houses in the local environment because more crime in the area. Yours sincerely, Leo Gouval.

Dear Wombourne Parish Council,
My name is [redacted] and I am
a year 4 pupil at St. Bernadette's Primary
School.

I have read and heard that there
are plans to build new houses on
local green belt land in my village
of Wombourne. In the following letter
I will argue why I think this is
a bad idea.

First and foremost, if 223 new houses
are built in Wombourne on local
green belt they will no space in
the doctors, schools and much more.

Secondly, Wombourne local green belt is
beautiful and fun so if a new house
is built on it many people will be
upset. so would you like that?

Its quite clear that if 223 new houses
are built in Wombourne it will only
cause more pollution, floods, crime and
emergencies so does that mean you want
Wombourne to be in a state!?

On the other hand, others would argue
that ~~its~~ ^{the new houses to be built is} a good idea because people need

them if they want to move home^{use}.

In conclusion, after everything I've said I now hope you will agree with me to not build 223 new houses.

Yours & sincerely,

[Redacted]

Dear Wombourne Parish Council,
My name is [redacted] I am a
year 4 at St. Bernadette's Primary
School. I have read and heard that
there are plans to build new
houses on local green land in my
village, of Wombourne. In the following
letter I will argue why I think
that is a bad idea.

I firstly think building houses on
the green belt is a bad idea
because it will cause pollution for
the people of Wombourne and
the doctors are already full
dealing with covid.

Secondly, I think it's a bad idea
building houses on green land,
since the land that you
are planning to build houses on
is home to many animals, and if
you are going to build houses
on their homes, they would be
destroyed and that would just
be cruel.
Cruel

Dear Wombourne Parish Council.

I think building 223 on Wombourne green belt is a bad idea because beautiful nature will die from being squashed.

My second reason is that crime, crowding, money spending and pollution will be increased. It will also cause noise walls that'll be boring and people that already live in Wombourne will move out as Wombourne will become too busy.


To add to this, new houses will make shops, restaurants, schools and supermarkets will fill fill up causing queues.

Last, buildings will flood, Wombourne will flood like Flash Lane. The reason of it flooding is because water will be trapped by the walls making the water go higher and higher and higher!

However, some people may disagree with me because people would really like to move into Wombourne as it's a nice place to live.

To sum up, animals will not find
anywhere to live! They can't eat, drink or
find anywhere to hide from predators,
soon they'll die, and we don't
want them to die, do we?

This letter was written by a year
3 pupil at St. Bernadette's Primary
School.

Yours Sincerely, 

Dear Womborne Parish Council,
My name is [redacted] and I am a
year 4 pupil at St. Bernadette's Primary
School. I have read and heard that there are
plans to build new houses on local green
belt land in my village of Womborne.
In the following letter I will argue why
I think that this is a bad idea.

Firstly, school and doctors have no space for
new people moving to Womborne.

Secondly, new houses and people will mean more
traffic and pollution.

Last but not least, buildings will spoil
natural flood plains and natural things like
plants and flowers.

However, new houses are needed as some
people have nowhere to live.

I still strongly agree that the new houses
are a terrible idea. I hope you agree with
me.

Yours sincerely, [redacted]

Dear Wombour Parish Council,

My name is [redacted] and I am a year 3 pupil at St. Bernadette's Primary School. I have read and heard that there are plans to build new houses on local green belt land in Wombour. In the following letter I will argue why I think that it is a bad idea.

Firstly, it will cause pollution when adults go to work most mornings.

Furthermore, imagine you were a cow and you didn't have enough good to eat. How or where would you eat?

Also, doctors and nurses would have too many visitors.

Other people may agree that it is a good idea because people need houses to live in.

I still think it is a bad idea and I hope it never happens.

Yours sincerely,

[redacted]

Dear Wombourne Parish Council,
My name is Alexis and im a year 4 pupil
at St. Bernadette's primary School. I have read
and heard that there are plans to build new
houses on local green belt land in my
Village of Wombourne. In the following letter
I will argue why I think that is a bad
idea.

Firstly, 223 new houses will ruin nature
and if you went a stroll in the countryside
you can't.

Secondly, schools and doctors have no
space because they are full so where will
new people go?

Finally, it will cause more burglars and
robbers and we have enough houses already.

However, some people think its a good idea
to build new homes so I can live in
them.

I still think its a bad idea

Yours sensibly, Alexis Marshall.

Dear Wombourne Parish Council,
My name is [REDACTED] and I'm a Year 4 Pupil at St. Bernadette's Primary School. I have read and heard that there are plans to build more houses on our local green belt land in my village of Wombourne. In the following letter, I shall argue why I think this is a bad idea.

Firstly, the new houses, can cause a great of traffic, which gets annoying in a small village. Causing congestion annoys everyone else as much as we don't want the houses. Would you want to get rid of the magnificent view?

Furthermore, the houses can also cause, painful pollution. The buildings can also stop natural plants from draining flood's, which can cause a big problem, with flooding more in Wombourne.

School's, doctor's and hospital's don't have enough space for new people, there are enough people in the village already, school's don't have enough space for children, doctor's don't either for all ages! It'd be such a shame if you also put houses on poppy field's, now wouldn't it?

However, others may think that it's a good idea to build the 223 houses, since the council can benefit off the houses. The shops can too, since the shops can benefit as well from the majority of people living there.

I still strongly disagree, that putting houses on the green belt land is a bad idea.

Yours Sincerely,
[REDACTED]

Dear Wombourne Parish Council,
My name is [REDACTED] and I am a year 4 pupil at St. Bernadette's Primary school in Wombourne. I have read and heard that there are plans to build 223 houses on local green belt land in my village of Wombourne. In the following letter I will argue why I think that this is a bad idea.

Firstly why I disagree for houses being built in our green belt, is that you can build the 223 houses somewhere else instead of Wombourne. The most of my class disagree with this idea as it's a village, not a town.

Secondly, why I think it's a bad idea is it will get even more traffic for people getting back home from a hard day of work.

To add to this horrible idea is that it will block the water from going down the slight tipped hill.

However others might think that it is a good idea because it will make more houses for homeless people.

I still disagree and you should too.
Yours sincerely,
[REDACTED]

Dear Wombourne Parish Council,

My name is [REDACTED] and I am a year four pupil at St. Bernadette's Primary School. I have read and heard that there are plans to build new houses on local green belt land in my village of Wombourne. In the following letter, I will tell you why I think that it is a bad idea.

It is clear that most of the jobs in the village are already taken and our schools and doctors are already full.

New houses will mean more crime, traffic and bigger litter problems, and that will lead to rats. Do you really want rats everywhere?

If these 223 new houses are built our green village could have flooding problems too. Where will all of the rain water flow to?

However, some people might argue that some homeless people might be able to live in one of these new houses so it is a good idea.

I still think it is a bad idea to cover the village's green belt with houses. I hope that I have convinced you.

Yours sincerely,

[REDACTED]

[REDACTED]