

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

** If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text"/>	Miss
First Name	<input type="text"/>	Helen
Last Name	<input type="text"/>	Lowe
Job Title (where relevant)	<input type="text"/>	Director
Organisation (where relevant)	Payne Hicks Beach Trust Corporation Limited	Stansgate Planning
Address Line 1	<input type="text"/>	4 The Courtyard
Line 2	<input type="text"/>	Timothy's Bridge Road
Line 3	<input type="text"/>	Stratford-upon-Avon
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	CV37 9NP
Telephone Number	<input type="text"/>	01789 414097
E-mail Address	<input type="text"/>	helen@stansgate.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation: Payne Hicks Beach Trust Corporation Limited

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The overall housing target identified in Policy DS5 is not considered to adequately address the housing needs of the Housing Market Area (HMA). See separate representations in relation to Policy DS4 and housing needs.

The approach to locate growth at the most sustainable locations within the District is supported, however, the settlement hierarchy set out within Policy DS5 is considered to be flawed. The geographical extent of the South Staffordshire District is such that it wraps around the north western edge of the Birmingham and Black Country conurbation. The southern portion of the District is therefore inevitably situated in closest proximity to the metropolitan areas of Dudley, Wolverhampton and Stourbridge.

Wombourne is the largest settlement within the south of the District and was identified within the previous Publication Plan 2022 as the largest of the Tier 2 settlements. However, there is clear evidence that Wombourne should instead be categorised as a Tier 1 settlement as it has a very similar, if not greater level of accessibility to services and facilities than Penkridge, which is classed as a Tier 1 settlement. The proposed categorisation as a Tier 2 settlement is unjustified.

The Rural Services and Facilities Audit 2021 (RSFA) identifies the key indicators used to determine the relative sustainability of settlements within the District. These are: i) access to food stores; ii) diversity of accessible community facilities/services; iii) access to employment locations; iv) access to education



facilities; and v) public transport access to higher order services outside of the village.

Appendix 5 of the RSFA grades each of the settlements assessed and identifies which settlements fall under which Tier. Appendix 5 clearly states that Wombourne is a 'notable exception' to the other identified Tier 2 settlements due to its large village centre.

Appendix 4 of the RSFA sets out a table of facilities and services at each of the settlements appraised. Wombourne, when compared against Penkridge, is confirmed as having access to a wider range of retail opportunities, additional GP surgeries, additional pharmacies, more dental surgeries, more churches, more village hall facilities, more pubs and more day nurseries. Wombourne and Penkridge are shown as having similar levels of education provision, libraries, sports provision and travel times to larger centres.

Wombourne only scores lower than Penkridge in relation to access to employment centres due to the lack of a railway station within Wombourne. The Hansen Score mapping included at Appendix 3 of the RSFA shows that Wombourne has a similar level of accessibility to employment centres as the majority of Penkridge. Whilst there is no railway station within Wombourne the frequency and ease of access to bus routes which link Wombourne to the adjacent higher order settlements of Wolverhampton, Dudley and Stourbridge, in particular, are not fully considered. Whereas a rail route provides convenient access for those seeking to travel from within close proximity of a railway station to a location also within close proximity of another railway station, such instances are far more limited than the range of places accessible by bus routes.

People living within large areas of settlements that benefit from a railway station, for example large areas of Penkridge, will not be able to easily access rail services without first needing an alternative mode of transport to reach the station, be that cycling, driving or bus services. Conversely, as bus routes are able to stop at many locations, bus stops are frequently far more conveniently located for the population than railway stations. The ability for people to travel to employment opportunities by bus should therefore be given equal, if not greater, weight than the availability of railway stations for access to employment opportunities in the categorisation of settlements within the hierarchy.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The current categorisation of Wombourne as a Tier 2 settlement is unjustified given its proximity to the major urban areas of Wolverhampton, Dudley and Stourbridge, its accessibility to those areas and the level of services and facilities provided within the settlement itself.

The RSFA should attribute appropriate weight to all modes of public transport that can provide access to employment opportunities. This would likely result in a re-



categorisation of Wombourne as a Tier 1 settlement rather than a Tier 2 settlement.

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

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that matters relating to the classification of settlements within the settlement hierarchy is examined in full and that appropriate weighting and justification is given to all accessibility and sustainability criteria set out within the RSFA.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)



South Staffordshire Council

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX