

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW 2022 – PUBLICATION PLAN

SITE REFERENCE 036C South of Stafford

We strongly object to the inclusion of this possible site Ref. 036c south of Stafford in the South Staffordshire Local Plan Review. The site has already been rejected by the council's planning committee as a result of an application submitted in 2017. Application no.17/00505/OUT was refused by the planning committee in December 2017 in a near unanimous vote with just a handful of abstentions. An Appeal APP/C3430/W/18/3195496 was withdrawn by the applicant in September 2018 after South Staffordshire's housing allocations were updated. There was considerable disquiet amongst the residents in the south of Stafford and two coaches carried people to the planning meeting. It is therefore surprising that this site should be considered within the Local Plan at all.

A public meeting held recently was attended by nearly 150 people and an Action Group set up. Every one of the local councillors in Stafford Borough Council, South Staffordshire District Council and the Parish Council are against this proposal.

Its inclusion in the Local Plan is also surprising because it runs against many of the policy documents that the council has published and the single explanation for including it is unclear and contrived.

1. In the conclusions to Appendix 5 of the current Policy and Physical Constraints Document the following comments are made –

2.6 south of Stafford is not recommended to be taken forward to meet the GBHMA housing shortfall.

2.7 south of Stafford was deemed unlikely to meet the unmet needs of the conurbation and performed particularly badly in terms of deliverability and public transport access.

2.12 did not recommend that this site should be taken further forward.

2. In the conclusions in the current Local Plan Review Spatial Housing Strategy and Infrastructure Delivery Appendix 5 it is stated in relation to this particular site that *the study assessed the potential for urban extensions to the south of Stafford but did not recommend these should be taken further. This reflected the long distance of south of Stafford from the source of the unmet needs (the West Midlands conurbation) and the areas relatively poor performance in terms of deliverability and public transport.*

3. In the Local Plan Review – Publication Plan Item 5.7 on page 25 and Policy DS3 On page 26 refer particularly to development in the Open Countryside. Site 036c sits within the area designated as Open Countryside which is described as *much valued countryside particularly for its landscape and ecological qualities.*

4. Policy DS3 – Open Countryside states that *the Council will protect the intrinsic character and beauty of the Open Countryside whilst supporting development proposals which comply with four tests.* Development on site 36c would not comply with any of these and particularly the first of these (a) which states *-assist in delivering diverse and sustainable farming enterprises.*

5. The Policy later goes on to state that *all types of development in the Open Countryside not explicitly supported by Policy DS3 will be considered on a case by case basis and will only be permitted where they are not located on best and most versatile agricultural land and are fully consistent with any other relevant policies set out elsewhere in the Local Plan including but not*

limited to - overall development strategy, landscape character and assets, ecological assets and biodiversity, recreational assets and sustainable travel requirements. This proposed site does not comply with any of these policies.

6. Policy OC1: Development in the Open Countryside beyond the West Midlands Green Belt states that *the Open Countryside will be protected for its own sake, particularly for its landscapes, areas of ecological, historic, archaeological, agricultural and recreational value.* It then goes on to list development types within the Open Countryside that will normally be permitted. Development on site 036c falls outside every one of the criteria.

7. There are very few specific references to this particular possible site reference 036c on the southern edge of Stafford. In the Local Plan Review published in November 2022 item 5.28 page 34 reads –*This location will not be a focus for larger scale housing growth. This recognises the sensitive landscape and potential highways concerns that larger scale growth in this location could cause, as well as the lack of unmet housing needs in Stafford and the remoteness from areas of unmet needs in the wider GBBCHMA. Instead, a smaller scale extension to the adjacent town of Stafford will be delivered in this area which will ensure the sustainable delivery of non-Green Belt housing land in the district.* It is interesting that S Staffs have admitted the problems associated with this site. Surely this housing should in fact be located in a much more sustainable location where new services are provided together with existing easy access to road and rail networks within the South Staffordshire Council area and on Open Countryside land if this really is a criteria.

8. This site is totally isolated from all villages and other developments in South Staffordshire and is entirely reliant on its close proximity to Stafford. The two authorities have previously worked closely together over their respective local plans, adopted an agreed approach and no strategic locations were included on the edge of Stafford in either earlier plans. Stafford Borough Council submitted a letter of objection to South Staffordshire in relation to this site on the 6th December 2021 and made the following comments – *it should be noted that the Borough Council has significant concerns in terms of Policy DS3 and Table 8 regarding an urban extension of Stafford Town arising from new development being identified on the southern boundary of Stafford Borough for a minimum of 168 houses in the A34 corridor Site 036c. This would not appear to accord with Strategic Objective 2 of the New Local Plan Preferred Option as a sustainable approach to meeting the needs of the Greater Birmingham Housing Market Area. In particular it is considered that this location is less sustainable and deliverable than other sites in South Staffordshire adjacent to or in close vicinity to the Black Country authorities where housing need is originating. Therefore reference to this site should be removed from the New Local Plan process and subsequent iterations of the Plan including reference in Policy DS3, Table 8, Policy SA5, paragraph 4.24 and Appendix F.*

Furthermore such a development does not demonstrate it would provide appropriate infrastructure to mitigate the impact. There is no relationship to the existing urban form. The site is remote from any settlement or services in South Staffordshire with the occupiers looking to Stafford to provide their services. This will impact on roads, schools, and leisure provision in Stafford which have a number of capacity issues.

9. The comments of the CPRE in December 2021 read – *The CPRE has supported the District Council in the preparation of the Core Strategy which has made adequate provision for substantial levels of new housing throughout the District. The Local Plan Inspector thoroughly endorsed the strategy The site in question (Ref. 036c) is NOT ONE OF THE IDENTIFIED SITES. The current proposal does not accord with the statutory development plan programme and we see no justification for allowing this development on this green field site on NPPF housing land supply or other grounds.*

10. The 10,000 new homes proposed in the adopted Stafford Local Plan includes two thirds for households from outside the Borough including South Staffordshire. With windfall sites on brownfield land Stafford's development rates are far exceeding its Local Plan requirements and further green field sites are not required. This has been accepted both by Inspectors and the High Court. This site is not required.

11. Stafford Borough Council is massively exceeding its allocated numbers of housing. There was an overprovision of 1626 homes completed up to 2020. There are huge numbers of new homes currently being completed all around Stafford itself including for example at Beaconside, GEC Measurements at St Leonards and on the old police station headquarters site on the Cannock Road. An additional 365 homes on the GEC/Alsthom site on Lichfield Road is now on site (Lichfield Road and Cannock Road join to access Stafford town centre).

12. The new proposed Stafford Borough Local Plan 2020-2040 includes an additional 12,580 new dwellings with 7,385 of these to be built in Stafford Town with 435 dwellings planned per year. There are no sites planned in the south Stafford in this new Stafford Borough Local Plan which recognises the infrastructure and other problems of adding housing in this area.

13. There is absolutely no case for needing more housing to serve Stafford which is what this proposal would effectively be doing.

14. The infrastructure problems were outlined in submissions in 2021 but have become increasingly difficult since then. There are no school places available now and in the foreseeable future in South Stafford where most of the schools are Academies and are very popular. Pages 538 and 539 of the South Staffordshire Local Plan 2022 makes the following opening statement – *Major positive effects are predicted against the education criteria due to new residents access to both primary and secondary education.* The Sustainability Appraisal repeats this as a prime positive for allocating this site. **However this is not true.** Staffordshire County Council in their February 2022 Potential Sites Consultation when considering primary capacity in the whole of south Stafford state that there are *no available places across Stafford South planning area based on current pupil movement and modelling and that studies suggest that on paper primary school sites in this area are not large enough to accommodate expansion. Walton High School has limited potential for expansion.* The area is in a red classification *where no mitigation is possible on existing sites at all education phases.* Pupils from any new developments in this area would need to travel 3-5 miles in order to obtain their education. This is highly undesirable in terms of children's education but is also non sustainable, illogical and decidedly does not comply with Stafford Borough's Carbon Neutral Policy.

15. There is just one GP practice serving the area which currently has 23,000 registered patients. The health centre has very limited if any space for expansion.

16. The road system is severely congested particularly at peak times. The road system in south Stafford is based on a radial system with no ring roads. As a result traffic is concentrated on Cannock Road/Lichfield Road for anyone wishing to drive towards Stafford town centre. This results in capacity problems particularly at peak times. The planning application lodged by Gladman Developments in 2017 accepted this – *vehicular demand exceeds the available capacity and there are capacity problems at present.* A considerable number of dwellings have been completed nearby since then (see paragraph 11) and further ones are now on site each generating many more vehicle movements.

17. Any development in this location will also inevitably lead to excessive traffic using the often single track and dangerous Acton Hill Lane which is by far the shortest and quickest route to the motorway cutting through the village of Acton Trussell.

18. Strategic Objective 5 in the South Staffs Local Plan is *to encourage healthy communities through the provision of good access to health and education infrastructure, open space, sport and leisure* and Objective 9 in the same Plan states *that new development should be served by appropriate infrastructure such as road improvements, health, recreation and education facilities*. This is not possible at this location for all the reasons given above.

19. The site is a wonderful rolling hillside providing excellent productive and well managed agricultural land with a real parkland feel. A description agreed by the South Staffordshire Planning Authority in relation to the earlier applications. This particular field is a wonderfully productive one with a third or fourth crop this year having been recently planted and is very well managed. It provides a green lung to the southern end of the very large Wildwood estate in Stafford and gives extensive views from the A34. It is also visible from the Cannock Chase AONB who have also lodged their objections. The site is just one kilometre from the AONB boundary and so is in its immediate setting and is likely to have a detrimental impact. Developing this site would not be in accordance with Strategic Objective 2 *to protect and retain the important gaps between existing settlements* and Objective 3 *to protect South Staffordshire's environmental assets*.

20. Objective 4 is *to protect, conserve and enhance the countryside, character and quality of the landscape and diversity of wildlife habitats*. This possible site is a very diverse wildlife habitat with over 34 types of birds, deer, [REDACTED], bats and hares regularly found. The site links via Haselstrine woods to the Sow and Penk Countryside Enhancement Area in the Stafford Borough Local Plan. A considerable amount of land particularly around the field edges is left fallow which specifically allows the wildlife to thrive. In NPPF terms this is clearly not land of 'a lesser environmental value'.

21. The decision by South Staffordshire to halve the number of homes to be built on this site makes no difference to any of the above. The land now included will take away all views from the Wildwood estate and all the existing extensive views from the A34, will still take a considerable amount of good agricultural land and will still be very visible from the Cannock Chase AONB.

22. In NPPF terms this proposal does not comply with the test of sustainability, is none compliant in terms of NPPF and the adverse effects heavily outweigh any conceivable benefits.

23. It is noted that there are some strong suggestions from objectors such as the CPRE that there is an overprovision of homes in the South Staffordshire Local Plan. In addition the government has recently revised its mandatory stance on housing numbers for Local Authorities and who now have much greater flexibility in deciding their own requirements. Interestingly housing number requirements not given as a reason for including this site just a rather spurious idea that another site in Open Countryside should be included in this area.

24. This proposal on site reference 036C is unsound and not at all sustainable and should be deleted from the South Staffordshire Local Plan.

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[REDACTED]