

	<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	Mr	
First Name	Arthur	
Last Name	Clare-Hay	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████	
Line 2	██████████	
Line 3	██████	
Line 4	██████████	
Post Code	██████	
Telephone Number	██████████	
E-mail Address (where relevant)	██████████████████	



Part B – Please use a separate sheet for each representation

Name or Organisation:

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="text"/>	No	<input type="text" value="No"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="No"/>

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.

With regards to Policy DS3 Open Countryside, I have come to the view that site 036c fails all 3. It is my considered opinion that the site of 036c in the South Staffordshire Publication Plan, The Plan, is unsound and may not be legally compliant with Policy DS3.

Quoting from the Policy:

The council will protect the intrinsic character and beauty of the Open Countryside whilst supporting development proposals which:

- A Assist in delivering diverse and sustainable farming enterprises;
- B Deliver/assist in delivering other countryside-based enterprises and activities, including those which promote the recreation and enjoyment of the countryside, such as forestry, horticulture, fishing and equestrian activities;
- C Provide for the sensitive use of renewable energy resources (in conjunction with policy NB5); or
- D- Enable the re-use of existing building, providing that the proposed use of any building (taking into account the size of any extensions, rebuilding or required alterations) would not harm the intrinsic character and beauty of the Open Countryside.

The proposed development at site 036c meets none of these objectives.

Quoting again: Such proposals will only be permitted where they are not located on best and most versatile agricultural land.

The proposed development at site 036c is on grade 2 – 3 farming land, that is being and has been productively farmed for 3 generations by the same family.



Quoting again, continuing from the previous quotation (in respect of site 036c): and are fully consistent with any other relevant policies set out elsewhere in the Local Plan. These included but are not limited to, policies which relate to the districts overall development strategy. **Again, arguably not met, housing in the wrong location being excessively provided for in the SSDC 2024 Plan.**

- Design standards – **not addressed.**
- Landscape character and assets – **not met**
- Heritage assets – **not addressed, the property and adjacent Farm , which will be endangered by this and likely future development that follows it, are part of the historic Earls of Litchfield land and was the home of his land manager/Bailiff.**
- Ecological assets and biodiversity **Not met and cannot be realistically met by claimed offsets such as 'diversity in gardens' or financial contributions to the Cannock Chase AONB**
- Recreational assets **Not met**
- Housing mix requirements (where applicable) **Not met**
- Sustainable travel requirements **Nil within SSDC and severely overloaded within the adjacent SBC**

The expressed reason for the use of this land within the Plan is that it is not Green Belt. This might be justified if the 81 house were either necessary to meet the overall SSDC housing demand or, more particularly local demand. Clause 5.28 of the Plan makes clear that there is no unmet housing need:

Southern edge of Stafford (A34 corridor)

5.28 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 this locations remoteness from the areas where unmet needs are generated. Instead, Instead the 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.

Has the SSDC plan considered and appropriately recognised the provision of houses by SBC for neighbouring authorities, and thus formally asked the question, if the Plan numbers are actually necessary or justified, elsewhere? I ask the inspector to consider if this aspect has been properly addressed in the SSDC Plan.

Is it sound?

SSDC may argue that they have professionally assessed all of the available site and that site 036c is the least damaging to the natural environment.

Any such argument is flawed because:

A The assessment of the site by SSDC consultants Lepus rated the site as a Major Positive in respect of education. This has not taken into account, or ignored the fact that local schools are confirmed as full. Without such an inaccurate Major Positive marking in the consultants assessment, there are 5 Minor Negative assessments, 1 Major Negative assessment, and only 2 Minor Positives for site 036c. If the incorrect assessment in respect of education were to be removed, the consultant's assessment would expect to be reversed.

B The land is within the SAC of the Cannock Chase AONB. There is no evidence in the Plan that this has been taken into account. This conflicts with the SDC SAC Cannock Chase Special Area of Conservation (SAC) Guidance to Mitigate The Impact of New Residential Development (March 2022) Policy EQ2: development will only be permitted where it can be demonstrated that it will not be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC). The site 036c is a very important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the



River Penk, Mitigation as permitted in the SAC by way of `contributions to habitat management, access management, and visitor infrastructure , publicity, natural green recreational space, within development sites where they can be accommodated, and where they cannot, by contributions to off-site alternative green space. ` the use of site 036c will bot be able to mitigate the impact of wildlife movements between these important sites South of Stafford SDC have assumed will provide services at the very Northern boundary of South Staffordshire.

F If the SSDC Plan does actually need to deliver the number of houses within the Plan, "which is disputed here and elsewhere" , it is suggested that they would be more effectively place a greater distance from Stafford. It is suggested that sites not constrained by Green Belt constraints, such as Cheslin Hay/Great Wyrley, Codsall/Bilbrook, or even sites further South in SSDc closer to the West Midlands. These could be logically reconsidered to be enlarged to deliver the 81 properties, if indeed they are needed at all. G SSDC does maintain a Brownfield Register. It appears to contain 1.9 hectares owned by a public authority and 2.5 hectares not owned by a public authority deemed suitable for development; if the 81 houses are deemd necessary, could this 4.4 hectares be used as a suitable alternative to site 036c

(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.

(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

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:

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 \(sstaffs.gov.uk\)](#)

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