

	<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	Ian	
Last Name	Henderson	
Job Title (where relevant)	Dip.Arch. RIBA	
Organisation (where relevant)	South Stafford Action Group	
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	Various	Policy	Various	Policies Map	036C Page 235
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input 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.

We strongly object to the inclusion of this possible site Ref. 036c land at Weeping Cross south of Stafford in the South Staffordshire Local Plan Review. (It should be pointed out that this site location is incorrect – Weeping Cross is around a mile away on the A513 Lichfield Road)

1. The site has already been rejected by the council’s planning committee as a result of an application submitted by Gladman 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 in response to the proposed 2022 Local Plan Review was attended by nearly 150 people. Meetings in both South Staffordshire and the south Stafford have been held in response to the latest iteration of the Plan Review 2024 and several hundred people attended. Every one of the local councillors from all parties in Staffordshire County Council, Stafford Borough Council, South Staffordshire District Council and the Parish Council are against this proposal.

2. 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 – *will ensure the sustainable delivery of non- Green Belt housing land in the district.*

3. In the conclusions to Appendix 5 of the 2022 Policy and Physical Constraints Document it is recommended three times that this site should not be taken forward into the Local Plan as follows –

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.

4. In the conclusions in the 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 it 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.*

5. In the latest Local Plan Review – Publication Plan Item 5.7 on page 25 and Policy DS3 refer particularly to development in the Open Countryside and describe it as *much valued countryside particularly for its landscape and ecological qualities.* This site is within the Open Countryside.

6. 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 – none of these tests apply to this site.* It goes on to say that *such proposals will only be permitted where there they are not located on best and most versatile land.* This site is classed as Grade 2 or 3a agricultural land and is, using the councils own classification, classed as the best. It should not therefore be developed.

7. This site is totally isolated from all villages and other developments in South Staffordshire and should be entirely reliant on its close proximity to Stafford. The site does not serve the needs of South Staffordshire as described in the Plan and would not serve the needs of the Black Country Authorities.

8. Stafford Borough Council submitted a Representation Form with objections to South Staffordshire in relation to this site on the 23rd December 2022 – *it should be noted that the Borough Council has significant concerns in terms of Policy DS5 and Table 8 regarding an urban extension of Stafford Town arising from new development being identified on the southern boundary of Stafford Borough. This would not appear to accord with Strategic Objective 2 of the New Local Plan Publication 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 proximity to the Black Country authorities where housing need is originating. Therefore reference to this new development should not have been included in the new Local Plan including reference in Policy DS5 Table 8, Policy SA5 and the proforma in Appendix C. Under item 6 it concludes that reference to the new development should not have been included in the Local Plan.*

9. The comments of the CPRE in December 2022 read - *The site in question (Ref. 036c) is not one of the identified sites in the Core Strategy. 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. It was agreed with South Staffordshire Council that the town of Stafford would not be extended southward in paragraph 3.12 of the current Adopted Plan for Stafford Borough 2011-2031.

The present adopted Stafford Local Plan under paragraph 3.11.1 states as follows *accommodate demands within the Borough including any which may arise from the diversion of some demand from South Staffordshire*. The 10,000 new homes proposed in the present adopted Stafford Local Plan includes two thirds for households from outside the Borough including South Staffordshire. 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 plans.

Stafford Borough Council is massively exceeding its allocated numbers of housing. There was an overprovision of 1626 homes completed up to 2020 and is at present exceeding its targets by an average of 100 dwellings per annum.

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.

There are no sites planned in the south of Stafford in the new proposed Stafford Borough Local Plan which recognises the infrastructure and other problems of adding housing in this area. There is absolutely no case for needing more housing to serve Stafford which is what this proposal would effectively be doing.

11. The infrastructure problems were outlined in submissions in 2022 but have become increasingly difficult since then. There are no school places available now and in the foreseeable future in the south of Stafford where most of the schools are Academies and are very popular. Staffordshire County Council in their 2022 Potential Sites Consultation carried out to aid the production of the Stafford Borough New Local Plan state that – *there are no available places across Stafford South planning area based on the 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.*

12. 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.

13. Any residents from this proposed housing site on the edge of south Stafford are therefore likely to have to travel considerable distances within the South Staffordshire Council district or Stafford Borough in order to obtain education for their children or primary healthcare. This is again non sustainable and illogical.

14. The road system is severely congested particularly at peak times. The road system in south Stafford is based on a historic radial system with no ring roads. As a result all traffic is concentrated on the Cannock Road/Lichfield Road for anyone wishing to drive towards Stafford town centre. This results in capacity problems particularly at peak times. The original planning application lodged by Gladman Developments in 2017 which was refused accepted this – *vehicular demand exceeds the available capacity and*



there are capacity problems at present. A considerable number of dwellings have been completed since then towards the town centre and further ones are in the process of being constructed now – for example 365 houses on the old GEC Alstom site near Queensway. – all of which will add considerably to the traffic difficulties when driving towards the town centre.

15. This proposed development will inevitably lead to increased traffic using the largely single track Acton Hill lane in order to get to the M6 motorway, schools, health facilities and the Penkridge railway station giving access to the Black Country and Birmingham.

16. The site is a wonderful rolling hillside providing excellent productive and well managed agricultural land with *a real parkland feel* – a description used by the South Staffordshire Planning Authority in the earlier applications. This particular field is an extremely productive one with three or four crop rotations a year. It provides a green lung to the southern end of the large Wildwood estate in Stafford and is extensively viewed from the A34. It is also visible and only one kilometre from the Cannock Chase AOB who also lodged their objections in December 2022.

17. This site is a very diverse wildlife habitat with over 34 types of birds, deer, [REDACTED] bats, hares and rabbits regularly found. A considerable area of land particularly around the field edges is presently left fallow which specifically allows the wildlife to thrive. It also connects via Hazelstrine Wood to the Sow and Penk Countryside Enhancement Area in the Stafford Borough Local Plan.

18. No clear reasons have been given for justifying this sites allocation for housing. It is in a remote NW corner of the South Staffordshire Council area, is intended to be entirely dependent on an adjoining authority Stafford Borough who are against the proposal and is taking excellent well managed agricultural land. The lack of viable facilities in the south of Stafford means that there will be considerable travel back to Penkridge a distance of around six miles. In addition it is exceedingly unpopular with the local population both in South Staffordshire and Stafford Borough.

19. This proposal for 81 houses on site reference 036C is not sustainable, is unsound and should be deleted from the South Staffordshire Local Plan.

(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.

. This proposal for 81 houses on site reference 036C is not sustainable, is unsound and should be deleted from the South Staffordshire Local Plan.

(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:

There is so much to discuss and explain! Rather more than can be written on a form.

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