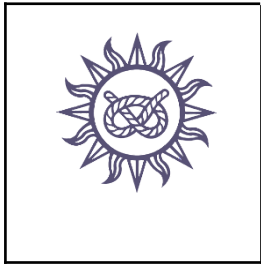




Data Protection



Local Plan
Publication Stage
Representation Form

Ref:

(For
official
use only)

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" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Kia"/>	<input type="text"/>
Last Name	<input type="text" value="Hunt"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text"/>



Part B – Please use a separate sheet for each representation

Name or Organisation: Kia Hunt

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

Paragraph	11.8 - 11.10 Pages 128-129	Policy	EC11: Infrastruct ure	Policies Map	Page 235 Site ref 036c
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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.

I consider that, in respect of site 036c in the South Staffs Publication Plan, the Plan is unsound and may not be legally compliant. It has evidently not been the subject of effective 'duty to co-operate' liaison with Stafford Borough Council (SBC). I ask for site 036c to be deleted, in its entirety, from the Plan.

My reasons are as follows:

Policy EC11 Infrastructure states that:

- 11.8 "The council and its partners will ensure that development within the district contributes towards the creation of sustainable communities, and where appropriate infrastructure is provided." - Given that the **site 036c has been allocated at the very edge of South Staffordshire District council's boundaries, which will undoubtedly put unprecedented strain on the infrastructure of the neighbouring district and council**; Stafford Borough, this policy has not been met - not only would **site 036c not contribute the creation of sustainable communities, it would in fact do the opposite** as it would add pressure onto community infrastructure that is already strained. It is also important to note that **Stafford Borough council's infrastructure has not yet felt the full impact of the 300+ new homes being built in Victoria Place** (Lichfield Road development site)



- "Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms." - it is clear that **suitable arrangements for the improvement of infrastructure necessary to make the scheme acceptable have not been made as evidenced by the fact that Stafford Borough (the neighbouring council) is itself is opposed to site 036c**, because it is clear to them and others who read the plan that South Staffs have chosen a site on the edge of their boundary so that any infrastructure needs will effectively need to be serviced by another council.
- "Developers and landowners must work positively with the council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance." - again, **the neighbouring authorities and infrastructure providers such as Stafford Borough Council, as well as neighbouring parishes such as Acton Trussell, are directly in opposition to the development of site 036c**, so this has most certainly not been met. **SSDC have the opposite of a positive working relationship**, making it as convoluted as possible for anyone who disagrees with their plan to be able to make their voice heard, council or otherwise.
- I believe that **the plan is defective in terms of soundness** (with regards to site 036c and the Infrastructure policy) because of the **strain it will put on local infrastructure, roads, services and amenities** but most importantly it **fails in its compliance with a duty to cooperate** in that the neighbouring council is opposed to how this development would put pressure on our own already highly pressurised infrastructure.
- Site 036c has been objected to in the past because of the community's concerns about **impact on health infrastructure, schools, and road traffic**. Not only do **these reasons still stand**, but also since then road traffic and conditions throughout Stafford and in particular on the Acton Hill Road (the main route for this proposed site) has worsened significantly, **the impact of site 036c would put huge pressure on this road and other high traffic routes** that Stafford Borough are already struggling to maintain - not to mention that once the new houses at Victoria Place are built, the Lichfield Road (the main route into Stafford Town from Wildwood and Weeping Cross) will be subjected to even more traffic issues, which would be exacerbated even further should site 036c be given permission to go ahead.
- It is also important to point out that this site allocation (036c) **sets a harmful precedent** for local councils to be able to allocate housing developments at the very edge of their boundaries and effectively 'expand inwards' by **taking unfair advantage of neighbouring infrastructure**, whereas councils should be expanding outwards from the centre and taking full responsibility for the infrastructural needs of their own borough and developments.

For reasons stated above, I find the proposed plan for site 036c to be unsound, in breach of policy EC11 regarding infrastructure, and failing to comply with a duty to cooperate.

(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.

I ask the Inspector to address the matters above and as a result, to delete, in its entirety, the planned development at location 036c.

Even though the Publication Plan in question exceeds the district housing requirement of 4,086 houses by over 15% (not 10% as quoted), I understand that an alternative is sometimes needed when requesting for a proposed development site to be removed from the plan, which is why I would recommend that the area surrounding Penkridge be looked into as an alternative if necessary, as this was outlined as an area for strategic development in policy SA2 - it would not breach duty to co-operate as it is not situated on the border of a neighbouring district with already strained infrastructure.

(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:

I consider it necessary to attend the hearing to ensure that the breaches of policy are heard and considered by the inspector.

This is especially important because site 036c has been objected to and rejected multiple times in the past, I would like to attend the hearing to ensure that the inspector notes that past objections still stand, and that the very significant number of voices in the community who had given their time, energy and financial support to have their objections heard are not ignored.

My attendance at the hearing will likely be represented by an expert whom we have funded as members of the opposing resident community.



South Staffordshire Council

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