

	<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	Dr & Mrs	
First Name	Christopher & Judy	
Last Name	Jones	
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	Paragraph 5.7 Pages 25 to 27	Policy	DS3 Open Country-side	Policies Map	Site ref 036c Page 235
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input 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 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) and it appears to breach the NPPF.

We ask for site 036c to be deleted, in its entirety, from the Plan. Our reasons are detailed in this and our other Part B submissions:

Policy DS3 on pages 26 and 27 of South Staffs Publication Plan (SSPP) states:

'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 an 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 criteria but instead destroys an area of productive good quality farming land. Land that has been classified by SSDSC consultant Lepus as Grade 3 transitioning to Grade 2 towards the village of Acton Trussell (Figure 14.1 page 124 of Sustainability Appraisal of the South Staffordshire Local Plan Review 2019-2039, Volume 2 of 3: Regulation 19 SA, Report October 2022) and Grade 3a "good quality agricultural land" (Natural England Guide to assessing development proposals on agricultural land, February 2021, gov.uk) by the Tenant Farmer

Footnote 62 on page 52 of the National Planning Policy Framework (NPPF) 19 December 2023, states:

"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development."

The land at Site 036c is of higher quality. There is brownfield land in the District, notably at ROF Featherstone, (SSPP page 246 Site E18) allocated for industrial development, but able to accommodate housing. As set out in our comments on Policy DS5 we consider the development at Site 036c to be unjustified and in the wrong location.

The war in Ukraine has brought food security into sharp focus. The use of good farmland for housing when other brown field sites are available is not only against the interest of South Staffs residents but of the Nation as a whole.

Site 036c is about 2.1km from Cannock Chase and within the Zone of Influence of the Cannock Chase Area of Conservation (SAC) in the Cannock Chase Area of Outstanding Natural Beauty(ANOB).

Strategic Objective 11 on page 22 of the South Staffs Publication Plan states:

"Strategic Objective 11: Protect and enhance the district's natural environment including the district's landscape character and key natural assets such as the Cannock Chase Special Area of Conservation, whilst ensuring that biodiversity net gain is delivered across the district."

Site 036c is on open countryside, a landscape rising, with hedgerows and trees, towards Parrot's Farm on Acton Hill. Currently in agricultural use the land is free of modern buildings or other man made structures. On this rising ground the proposed housing development would totally destroy the bucolic character of the landscape and be clearly visible from some distance, including from Cannock Chase ANOB. It lies in a region of Green Infrastructure that links Cannock Chase Area of Outstanding Natural Beauty and the Penk River valley flood plain, a haven for a wide variety of wildlife including swans, herons, ducks, coots, moorhens and migrating wildfowl. On occasion we have seen as many as 200 Canada geese



gathered there. If site 036c were to be developed this would set a precedent that would inevitably lead to further development over the whole of Acton Hill to the village of Acton Trussell. The developers will press for additional houses to be built as they have done previously, but had to withdraw following strong resident objection and unanimous opposition from SSDC Councillors in 2017. If a precedent were set by the inclusion of Site 036c they would no doubt persist in seeking further development over Acton Hill. Eventually this would block off the natural Green Infrastructure corridor between Acton Trussell and Wildwood that links the Penk valley and Cannock Chase ANOB. The inevitable negative effect on biodiversity would be prejudicial to the Environmental policy objectives of both SSDC and Stafford Borough and be difficult, if not impossible, to prevent once the precedent were set.

Site 036c is inappropriate for development on environmental grounds and, as set out in our comments on Policy DS5, unnecessary.

(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.

Delete, in its entirety, the planned development at location 036c for the reasons above.

(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:



***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