

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref:</b></p>  <p><b>(For official use only)</b></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 5.61 Pages 47 to 48	Policy	DS5 Spatial Strategy	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"/>	NO
(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NO
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	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.

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 does not appear to have been the subject of effective 'duty to co-operate' liaison with Stafford Borough Council (SBC). We ask for site 036c to be deleted, in its entirety, from the Plan.

Our reasons are:

The site, 036c, is adjacent to Wildwood (Borough of Stafford) but located within the Parish of Acton Trussell, Bednall and Teddesley Hay about 1.6km from the Tier 5 village of Acton Trussell.

In the South Staffs Publication Plan, Page 30 5.21 Table 7 the housing target needs of South Staffs are stated as 4086. A further 640 are allocated to contribute to the unmet needs of Greater Birmingham and Black Country Housing Market Area (GBBCHMA) giving a total of 4726. The Table on Page 31 of the South Staffs Publication Plan provides for 5199 dwellings in total, that is 473 more than needed by the Plan.

In the South Staffs Publication Plan, Page 49 DS5 states:

*"The district's Tier 5 settlements are set out in the Rural Services and Facilities*



*Audit 2021. These settlements are not intended to experience further housing or employment growth, owing to their poorer sustainability credentials, poorer public transport links and lack of services and facilities relative to other settlements within the district. New development in these locations will be limited to the conversion and re-use of redundant rural buildings to appropriate uses, in accordance with other development plan policies. On a case-by-case basis, the very limited redevelopment of previously developed land for housing may also be supported within these settlements where this would not increase unsustainable transport movements from the settlement in question and would not conflict with other Local Plan policies."*

Also

*"Growth adjacent to the town of Stafford*

*Housing growth will be located at the strategic allocation made adjacent to Stafford through this Local Plan, in order to facilitate sustainable growth at a non-Green Belt location.*

*This is: Land at Weeping Cross, west of the A34."*

South Staffs has no local infrastructure to provide for the health or education of residents at Site 036c. These facilities are available only in Stafford Borough and are oversubscribed as set out in our comments on Policies HC14 Health and HC15 Education. Stafford Borough would not receive Council Tax from the occupants of Site 036c yet would have to provide the necessary infrastructure. Our understanding from our Parish Council is that Stafford Borough are opposed to this development on their southern border.

*Recent housing developments between Wildwood and Stafford, fully meet the declared Stafford Borough Council and SSDC needs in this area and entirely negate the need for 81 houses at site 036c. Paragraph 3.12 of the Stafford Borough Plan 2011-2031 states: "Furthermore, land south of Stafford was identified as a cross border issue to be considered by Stafford Borough Council and South Staffordshire District Council when preparing their new Plans. The West Midlands RSS review process stated that "Dependant upon the outcome of local studies, some of the Stafford town allocation could be made, adjacent to the settlement, in South Staffordshire District." Both Councils have been in dialogue concerning future development south of Stafford and a number of evidence based studies have been carried out as well as meetings with relevant landowners and developers. The Plan for Stafford Borough is based on the clear conclusion that development in this location is both less practical and less sustainable than at other locations around Stafford town, and it is therefore not proposed to identify significant development south of Stafford in the new Plan.'*

*This expressed joint conclusion has not been taken into account in the South Staffs Publication Plan.*

Site 036c is located some 15 to 20 miles from the Greater Birmingham and Black Country Housing Market Area. Travelling there from Site 036c involves a tiresome commute over congested roads or using Stafford or Penkridge railway stations and incurring the significant additional expense of parking there. Relative to closer locations, the extra travel and contribution to congestion on road and rail would make the Site 036c a highly unsuitable location to provide for the unmet needs of GBBCHMA. In addition the extra carbon emissions resulting from the longer journeys would be counter to the aspiration of reducing greenhouse gas emissions



expressed in paragraph 13.1 on Page 143 of the Plan.

Stafford Borough Council's response in the SSDC 2022 PP consultation to the identical proposed housing allocation on its border considered that it did *"..not 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 vicinity to the Black Country authorities where housing need is originating"*.

As local residents, voters and Council Tax payers in the Parish of Acton Trussell, Bednall and Teddesley Hay we would like to know who will benefit from the allocation of housing at Site 036c.

Clearly not the residents of Acton Trussell, Bednall and Teddesley Hay in whose Parish it is located or of Wildwood, Weeping Cross or Baswich. Many have signed a petition and undertaken a crowdfunding exercise to engage expert assistance in opposing this proposal when it comes before the inspector.

Clearly not Stafford Borough who have no need of this development, would have to provide its supporting infrastructure yet would not receive the Council Tax returns it generates.

Clearly not those concerned with the Environment on account of its being part of the Green Infrastructure linking Cannock Chase Area of Outstanding Natural Beauty and the Penk River valley flood plain, a haven for wildlife and migrating wildfowl.

Presumably not Greater Birmingham and Black Country Housing Market Area because the site is too remote from them and linked only by congested transport routes.

It is not clear to us how South Staffs would benefit as the overall allocation of housing in the Plan exceeds their target by 473 and Site 036c is isolated and remote from the main population centres of South Staffs.

No doubt the owners and developers of the land expect to profit from the proposal but why these third party interests should be promoted over those of the residents of Acton Trussell, Bednall and Teddesley Hay is not made clear to us in the South Staffs Publication Plan.

In respect of site 036c in the South Staffs Publication Plan, we consider the Plan to be unsound and possibly failing in its legal 'duty to co-operate' (SSPP 2020-2040 page 11 para.3.6).

(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

**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:



**South Staffordshire Council**

**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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX