

	<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	9.3 Page 100	Policy	HC15 Education	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.

Our reasons are:

The use of site 036c fails Policy HC15: Education in the South Staffs Publication Plan Page 100.

HC15 states:

*"Proposals that do not provide contributions towards education infrastructure where it has been determined that these are necessary will be refused."*

SSDC does not have local Education provision for this development. The nearest Schools are in Stafford Borough and are oversubscribed.

According to Policy HC15 it would appear that this development must be refused.

Stafford Borough Local Plan 2020-2040 page 95 Policy 37 'Infrastructure to support new development' states:

*A new development that generates a demand for infrastructure will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either:*



1. *Already in place; or,*
2. *There is a reliable mechanism to ensure that it will be delivered in the most appropriate place, to the required standard and when required.*

Our advice from Acton Trussell, Bednall and Teddesley Hay Parish Council is that the residents of Wildwood have significant concerns regarding the ability of local schools (and health facilities) to cater for the increased demand.

Quoting from information provided by ATBTH Parish Council:

*"In respect of schools the publicly available data (as at 23.05.24) shows that all the closest schools are full:*

*Oak ridge oversubscribed by 9(219/210)  
Walton High oversubscribed by 1(211/210)  
Leasowes Primary oversubscribed by 8 (428/420)*

*The Council's Housing Selection Topic Paper at Section 5.27 asserts at para. 5.27.5 that the proposal has been assessed as "having major positive impacts against education" based only upon the "site's proximity to local schools".*

*Stafford Borough Council's response in the 2022 consultation to the identical proposed housing allocation on its border considered that the proposed did "... not demonstrate it would provide appropriate infrastructure to mitigate the impact. There is no relationship to the existing urban form. The site is remote from any settlement or services in South Staffordshire, with the occupiers of the development looking to Stafford Town to provide their services. Accordingly this will impact on schools and leisure provision in Stafford, which have a number of capacity issues." It also refers to evidence at the time (and still understood to be the case as above) that "this area of Stafford Town - south is not able to accommodate further school provision."*

There is no stipulation associated with 036c that requires the construction of new school facilities in this locality within South Staffs, the proposal refers only to dwellings. The mechanism referred to in Stafford Borough Local Plan 2020-2040 page 95 Policy 37 appears not to exist making the proposal for site 036c at odds with the policy of Stafford Borough.

Our understanding from our Parish Council is that Stafford Borough are opposed to this development on their southern border as set out in our previous Part B objection under Policy DS5 Spatial Strategy.

*"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."*

In respect of site 036c in the South Staffs Publication Plan, we consider the Plan to be unsound and 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:



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