

	<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	Mrs	
First Name	Sarah	
Last Name	Matthews	
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	<b>5.7 Pages 25 to 27</b>	Policy	<b>DS3 Open Countryside</b>	Policies Map	<b>Page 235 Site ref 036c</b>
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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.

I don't think that, in respect of site 036c the South Staffs Publication Plan, is sound and or legally compliant or that it fulfils South Staffs' 'duty to co-operate' with Stafford Borough Council .

I ask for site 036c to be deleted, in its entirety, from the Plan.

My reasons are:

Legal Compliance

National Planning Policy Framework

South Staffs has a legal duty to comply with the National Planning Policy Framework. This states that 'development on land ... outside a Site of Special Scientific Interest ....which is likely to have an adverse effect on it ... should not normally be permitted' para. 186B

It also states that 'Great weight should be given to conserving ... Areas of Outstanding Natural Beauty ... development within their setting should be sensitively located and designed to avoid .... adverse impacts on the designated areas' para 182 Site 036c is part of the setting of Cannock Chase which is an AONB and includes an SSSI and also SBIs. Site 036c forms a wildlife corridor between the Chase and Penk Vale. Building 81 houses on the site will clearly have an adverse effect on the wildlife on Cannock Chase, disrupting the corridor and disturbing wildlife through light and noise pollution.



I also note that South Staffs have identified an adjacent area O36a as potentially suitable for the same developer to build 2823 houses, and I am concerned that the initial development of 81 houses will pave the way for the complete destruction of the wildlife corridor and create catastrophic disturbance to wildlife. The NPPF states that South Staffs has a duty to 'protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value' 191b and to 'limit the impact of light pollution from artificial light on local amenity' The views of rolling countryside have huge amenity value for people living or passing through the area, e.g. on the A34. Cannock Chase is prized not only locally but by visitors from all over the West Midlands and beyond for its recreational and amenity value, making it imperative to preserve its setting, which acts as a buffer zone for the Chase, quite apart from its intrinsic amenity value.

The South Staffs Local Plan Review

Policy DS3 Open Countryside

The Review states that the Council will

'a) Assist in delivering diverse and sustainable farming enterprises; and also that 'Such proposals [for developments in Open Countryside] will only be permitted where they are not located on best and most versatile agricultural land' Building 81 houses on Site O36c, which is Grade 2 -3 farmland and has been productively farmed for generations will certainly conflict with this part of the Policy.

This the Plan is compliant neither with the NPPF nor the Council's own Policy DS3

Soundness

The Local Plan Review states that 'The NPPF sets out that Local Plans ... will be assessed on whether they are considered 'sound'. Plans are considered sound if they are: ... justified ...'

The final sentence of Policy DS3 is 'Development proposals should be consistent with other Local Plan policies.'

However, the development proposal is inconsistent with

5.28 This location will not be a focus for larger-scale housing growth. This recognises the sensitive landscape and potential highways concerns that larger scale growth in this location could cause, as well as the lack of unmet housing needs in Stafford and the location's remoteness from areas where unmet needs are generated'

Thus the proposal is unsound.

Compliance with the duty to co-operate

The NPPF states that

'3.6 Local Planning Authorities have a legal duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. Strategic matters can include housing, employment, infrastructure, and the Green Belt'.

The proposal shows complete failure to co-operate with Stafford Borough. As Site O36C is right on the boundary between Stafford and South Staffs it is highly likely that residents would regard themselves as living in Stafford, and would look for services such as schools and doctors in Stafford. It is most unlikely that they would travel to e.g. Penkridge or Cannock to obtain such services. Yet already local schools are full and medical services overloaded. The A34 between Wildwood and Stafford town is already choked by regular traffic jams, the 74 bus service along the road is frequently delayed and it can take 5 minutes to get an opportunity to cross the road on foot at Hazelstrine, the N boundary of the site. I believe that Stafford Borough is opposed to this development. South Staffs will



receive the council taxes but Stafford will provide most services – hardly an example of cooperation!  
South Staffs itself has already twice rejected proposals by the same developer to build on Site 036C, both times with very substantial local opposition from Stafford residents.

Thus the proposal does not meet the duty to co-operate.

(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.

South Staffs should completely delete the planned development at Site 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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX