



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="MRS"/>	<input type="text"/>
First Name	<input type="text" value="DEBORAH"/>	<input type="text"/>
Last Name	<input type="text" value="MONNOX"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<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"/>	<input type="text"/>
Post Code	<input type="text" value="██████████"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<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: Deborah Monnox

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 reference 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.

**1. Is it legally compliant?**

My reasons are that I believe the plan, regarding site 036c in the South Staffs Publication Plan, is unsound and may not be legally compliant. It has failed in its "duty to co-operate" in its contact with SBC.

Site 036c should be completely deleted from the Plan.

The use of site 036c fails the NPPF 19 December 2023. See Section 15, conserving and enhancing the natural environment. The compliance with NPPF is a legal obligation.

- a) The land is farmland that has been graded in figure 14.1 as Grade 3, but then moves towards Acton Trussell as Grade 2. There has been information given from the Tenant Farmer that the land produces very well and that it is Grade 3a.
- b) The land is rolling countryside and can be seen from the Wildwood estate and the A34.
- c) The site 036c has an abundance of wildlife, including birds, deer, [REDACTED] bats, and rabbits. It's important for us to keep this biodiversity and the land links between Cannock Chase, the canal and also the River Penk. The Staffordshire Wildlife Diversity report seems to have been ignored in 036c.



The proposed development does not meet any of the DS3 objectives at site 036c. The land is on Grade 2-3 farming land that is being, and has been, farmed for three decades.

Overall development strategy has not been met, as the housing is in the wrong location and is being excessively provided in the SSDC 2024 plan.

- a) Design standards have not been addressed.
- b) Landscape character and assets – not met.
- c) Heritage assets – this has not been addressed. The land is part of the Earls of Lichfield land and will be endangered by this,
- d) Ecological assets and biodiversity – not met and cannot be realistically offset by diversity in people’s gardens or financial contributions to Cannock Chase.
- e) Recreational assets – not met.
- f) Sustainable travel requirements – NIL with SSDC and very overloaded within SBC.

Your justification for the proposal appears to be mostly that the site is not in Green Belt. However, it is not justified by the housing needs of either the West Midlands Conurbation or of the Stafford Borough Council. Stafford Borough Council has, and can, meet its own housing requirement and South Staffordshire Council has acknowledged the “lack of unmet housing need” in Stafford – the Stafford Borough is in a separate housing market area. Site 036c is disassociated from the rest of the Parish.

Also, the proposal does not assist in meeting the needs of South Staffordshire residents. These needs are met elsewhere in the district by the other allocations, including on non-green belt site, and which are focused on the district’s most sustainable larger settlements.

*Southern Edge of Stafford (A34 corridor)*

*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 lack of unmet housing needs in Stafford and the location’s remoteness from areas where unmet needs are generated. Instead, a smaller scale extension to the adjacent town of Stafford will be delivered in this area, which will ensure the sustainable delivery of non-Green Belt housing land in the district.*

The more general aspect of the SSDC plan is whether it has appropriately recognised the provision of houses by SBC for neighbouring authorities. Is this justified or necessary? We ask that this is to be reconsidered and we believe that this has not been properly addressed in the Plan.

## **2. Is it sound?**

SSDC may argue that they have professionally assessed all the available sites and that site 036c is the least damaging to the natural environment. Any argument is flawed because of the following:

1. The assessment of the site by SSDC’s consultants rated the site as a Major positive in respect of education. This did not consider the local schools which are at a capacity. This Major positive was inaccurate. The consultant’s assessment confirms that there are 5 minor negative assessments, 1 major negative and 2 minor positives for site 036c. If the incorrect education assessment was removed, then it would be expected that the consultant’s assessment would be reversed.



2. The land is in the SAC of the Cannock Chase AONB. There is absolutely no evidence in the plan that this has been considered. This conflicts with the SDC SAC Cannock Chase special area of conservation (SAC) guidance to mitigate the impact of new residential development (March 2022) Policy EQ2:  
**Development will only be permitted where it can be demonstrated that it will not be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cannock Chase SAC.**  
Site 036c is part of the continuity of open countryside between Cannock Chase AONB and the valley of the River Penk and is permitted in the SAC by way of - **contributions to habitat management, access management and visitor infrastructure, publicity, education, and awareness raising; and provision of suitable alternative natural green recreational space, within development sites where they can be accommodated and where they cannot by contributions to offside alternative green space.** It will be a concern to mitigate the impact on wildlife movements between these important sites South of Stafford.
3. Of all the sites assessed by the SSDC consultants Footprint Ecology HRA sites 016 and 036c are the closest to Cannock Chase AONB
4. Choosing site 036c is illogical and unsound in terms of localised housing needs. It is intimately linked to the Wildwood Estate. SBC have provided significantly more housing than their minimum requirements. There are more planned housing developments in South Stafford which are providing significant housing availability which would negate the need for site 036c. These housing developments have put excessive demands on local schools and health provisions within SBC, and SSDC have assumed that these services will be provided to site 036c. They are already over-subscribed.
5. If the SSDC does need to deliver these 81 houses then there are sites further away from Stafford, which are not constrained by Green Belt constraints. Namely, these are Cheslyn Hay/Great Wyrley, Codsall and Bilbrook, or even further south (closer to the West Midlands). All of these should be reconsidered, should the 81 properties be necessary at all?
6. SSDC maintains a Brownfield register. It contains 4.4 hectares that can be used to build the 81 houses and would be a suitable alternative to site 036c.

### **3. Does it comply with the Duty to co-operate.**

SSDC have not demonstrated that they have exercised their Duty to Co-operate with SBC. They have not acknowledged or taken account of the housing allocation that SBC have declared in their extant plan for Stafford Borough 2011-2031

**Clause 6.12:** *"it should be noted that the household projection figure is made up of 'local need' (i.e. natural change: the balance of births over deaths and reduction in average household size) and 'in-migration' elements, with the split for Stafford Borough being approximately 30% local need and 70% in-migration mainly from surrounding areas, the majority being from Cannock Chase District, South Staffordshire district, and Stoke-on-Trent. The government, through the NPPF, as stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term. In light of meeting objectively assessed needs it is sensible to plan for these, not least because it is consistent with the growth aspirations of Staff Town, and its developing sub-regional role, as set out in the Spatial Vision and Key Objectives earlier. This approach has also been supported by neighbouring local authorities through Duty to Co-operate cross-border meetings on the Plan for Stafford Borough: Strategic Policy Choices Document.*



This document has a projected build of 11,523 dwellings up to 2033 but it is understood that this target has already been exceeded. With 70% allocated to in-migration this means 70% of 11,523 = 8066. Wouldn't it reasonably be assumed that 30% of this, 2420 in total, houses within SBC should have been allowed for the SSDC plan; there is no evidence to suggest that this has been done.

No allowance has been made, and there is none documented, in this respect by SSDC in their 2024 publication plan.

Site 036c is, by conclusion, unnecessary and therefore surplus to reasonable requirements. I ask that this matter be addressed.

(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.

There is no justification for the site ref 036c, and we ask that it be withdrawn from the finally adopted Loan Plan

(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