



**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="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Edgar"/>	<input type="text"/>
Last Name	<input type="text" value="Williams"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="N/A"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="N/A"/>	<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" value="██████████ &amp; ██████████"/>	<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: **Edgar Williams**

3. To which part of the Local Plan does this representation relate?

Paragraph	5.7 Pages 25 to 27	Policy	DS3 Open Countryside	Policies Map	Page 235 Site ref 036c
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<b>NO</b>
(2) Sound	Yes	<input type="checkbox"/>	No	<b>NO</b>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<b>NO</b>

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 consider that, in respect of site 036c in the South Staffs Publication Plan, the Plan is unsound and may not be legally compliant. Furthermore it has evidently not been the subject of an effective 'duty to co-operate' with Stafford Borough Council (SBC).

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

My reasons are:

a) Paragraph 2.4 of the Plan boasts that the district has "a rich legacy of historic villages". Acton Trussell is such a village and this proposal poses a considerable threat to the true character of the village both through the development itself (i.e. 81 houses dislocated from the village itself) and the increased traffic through the village. Addressing 'the elephant in the room', is the dislocation of the 81 houses from the existing village eventually going to lead to the building of additional houses joining the new and existing developments which would completely destroy the character and ethos of the existing village?

b) By the District Council's own analysis (paragraph 2.8) the proposed development is in a "Tier 4" settlement area (i.e. it has one of the lowest levels



of access to services and facilities). It makes no sense to provide new houses in an area which is not well served for access to services and facilities.

- c) Paragraph 3 reminds us of the local planning authority's duty to co-operate with neighbouring authorities. This proposed housing development is on the northernmost boundary of the District Council's area and abuts the administrative area of Stafford Borough Council. I understand that Stafford Borough Council does not support this proposal and I would conclude, therefore, that the District Council has failed to fulfil its statutory duty to co-operate.
- d) The issues and challenges facing South Staffordshire (paragraph 3.15, SWOT analysis) identify the increased pressure for development on green field sites as a threat to the quality and character of the district "*which if not properly managed, could threaten the quality and character of the district*". The inclusion of this site in the Plan for the sake of a relatively modest contribution to the district's housing need represents a gross failure to manage this threat.
- e) The issues and challenges facing South Staffordshire (paragraph 3.15, Table 3) identify the need to ensure that the "*impact on the road network is fully considered and proposals limit the impact on network and mitigation measures are secured where appropriate*". I believe that this housing proposal has no regard for this matter. The additional traffic generated by 81 households will only add to the considerable volume of traffic flowing into Stafford via the A34 or, in the case of commuters heading for the A449 or M6, it will add to the already considerable over-use of Acton Hill Road as a short-cut. This country road is not wide enough for two family cars to pass in places. It has many twists and turns and, whichever route through the village of Acton Trussell drivers choose, they will encounter narrow residential streets, T-junctions, hump-back and narrow bridges. In short the additional traffic (especially that which is in the category of "I'm late – must hurry") will significantly increase the risk which is best described as a "serious accident waiting to happen".
- f) The issues and challenges facing South Staffordshire (paragraph 3.15, Table 4) states that "*the protection of the most sensitive areas of Open Countryside is a key issue*". The proposed site for this development is good agricultural land and, by the Plan's own admission, such land is a finite resource. Once it's gone, it's gone. The UK has an over-reliance on imported fresh foodstuff at present and is already vulnerable to unexpected supply shocks from climate change and geopolitical events. The Prime Minister himself said at the Farm to Fork summit held on 14 May 2024 that the country needs to do more to help farmers to increase production and "stand on or own two feet". The recently published UK food security index shows that only 17% of the fruit and 55% of the vegetables consumed in the UK is produced in this country. Overall the UK is the third highest importer of fresh fruit and vegetables in Europe. It makes no sense to build houses on good agricultural land – no matter what its size – if it can be avoided. Furthermore the proposed site fails to meet any of the criteria which the Council sets out in policy DS3 to "*protect the intrinsic character and beauty of the Open Countryside*" which are "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*". A reasonable inference to draw from these statements in relation to the proposed development is that the Council is operating by some **double standards**.

- g) Paragraph 5.22 of the Plan states "*The council's final preferred strategy seeks to deliver a balance of housing sites across the district*". This site is the **ONLY** site earmarked for a new allocation in ANY Tier 2, 3 or 4 village. Is this "balanced"? I think not. A point of clarification – the Plan consistently – and wrongly - refers to the site's location as Weeping Cross. Weeping Cross is an area of Stafford which is a 5 minute car journey away from the actual site which is in Acton Hill Road. Weeping Cross is in the administrative area of Stafford Borough Council. Another schoolboy error is contained in paragraph 5.61 relating to policy DS61. It lists all the District's Tier 4 settlements and names Bednall, Bishops Wood, Bobbington, Dunston, Himley, Seisdon and Trysull. It fails to mention Acton Trussell, the village on which this proposal would have the greatest impact. Have the planners omitted any reference to us out of embarrassment or for some other reason?
- h) Paragraph 5.28 of the Plan states that the "*location will not be a focus for larger-scale housing growth*" in recognition of "*the sensitive landscape and potential highways concerns that larger scale growth in this location could cause*". I would argue that a development of 81 houses in such a rural area **IS** in itself a threat to the sensitive landscape and a cause for highways concerns as described in e) above. There is also a very real danger that the land owner would see a 81 house development as just the beginning .... the thin end of the wedge .... and I recommend the removal of the proposed site from the Plan to safeguard the Council's stated aim to protect the sensitive landscape both now and in the future.

(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 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:

N/A

***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