



**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="RONALD"/>	<input type="text"/>
Last Name	<input type="text" value="WINDSOR"/>	<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"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>
Line 4		<input type="text"/>
Post Code		<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>



# Part B – Please use a separate sheet for each representation

Name or Organisation: MR RONALD WINDSOR

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

Paragraph	5.7 Pages 25 to 27 5.28 Page 34	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	<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.

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

I therefore ask for site 036c to be deleted in its entirety from the plan.

My reasons are :

Is it legally Compliant ?

The proposed development of site 036c fails the National Planning Policy Framework ( NPPF) Section 15 Conserving and enhancing the natural environment . Compliance with the NPPF is a legal obligation.

a) The land is productive farmland , classified by SSDSC consultant Lepus as Grade 3 transitioning to Grade 2 towards the village of Acton Trussell .According to the Tenant Farmer ( Parrott family ) it is grade 3a and very productive .

b) It is classical rolling countryside providing an excellent vista from both the large Wildwood ( Stafford ) development and the A34 SE of Stafford.

c) The site 036c is noted for its diversity of wildlife and is an important wildlife and biodiversity link between the Cannock Chase AONB and the Staffs and Worcester



Canal and the River Penk valley to the west. Connectivity is established as important in the Staffordshire Wildlife Trust Biodiversity Report which appears to have been ignored in the plan in respect of site 036c.

The plan is not Sound

1) The plan does not align with the SSDC own statement in Policy DS3 - " The council will protect the intrinsic character and beauty of the Open Countryside whilst supporting development proposals which :

a) Assist in delivering diverse and sustainable farming enterprises ( plus b/c/d)

Proposals which are not explicitly supported by the above Policy DS3 will be considered on a case by case basis.

" Such proposals will ONLY BE PERMITTED where they are not located on best and most versatile agricultural land "

The proposed development of site 036c does not meet any of these principles/objectives.

2)The reason for the use of this land ( site 036c ) within the SSDC Plan is that IT IS NOT GREEN BELT .

This might be justified if the 81 houses were either necessary to meet overall SSDC housing demand or , more particularly local demand .

Clause 5.28 of the plan states there is no local " unmet housing need " in the neighbouring area of SBC .

Quote of Clause 5.28

Southern Edge of Stafford ( A34 Corridor )

5.28 This location will not be a focus for LARGER SCALE GROWTH . This recognises the SENSITIVE LANDSCAPE and POTENTIAL HIGHWAY 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. 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.

I cannot believe that SSDC think they have the right to add an EXTENSION TO A NEIGHBOURING AUTHORITY without their agreement IN WRITING .

3) The plan does not comply with NPPF Section 3 Plan Making Para 35 :

a) It has not been positively prepared – it is not informed by agreement with other authorities – namely SBC

b) It is not justified – no account has been taken account of reasonable alternatives closer to where there is or may be a need for additional housing – it is certainly not needed in this location – SBC plan has more than sufficient housing allocation.

c) It is not effective –not deliverable over the plan period - no evidence of effective joint working on cross-boundary strategic matters ( e.g Housing Needs/Education / Health Infrastructure/ Transport / Waste Water) that have been dealt with rather than deferred, as EVIDENCED BY THE STATEMENT OF COMMON GROUND.

Duty to Co-operate

As partly noted above , SSDC do not provide evidence that they effectively exercised their Duty to Co-operate with SBC in that they have not acknowledged or taken into



account of the housing allocation that SBC have declared in their extant Plan for Stafford Borough 2011- 2031

No allowance appears to have been made and none is documented in the SSDC 2024 Publication Plan .

The obvious conclusion is that site 036c is totally unnecessary and is surplus to any reasonable requirements for north west SSDC and totally at odds with SBC housing site allocations .

I ask the inspector to address this matter in particular

(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 site 036c for the reasons outlined 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

**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:

To make the inspector fully aware of the further detail of the issues I have raised in the above submission about the proposed unnecessary development at site 036c

**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