

	<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\*

### 2. Agent's Details (if applicable)

*\*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.*

Title	B Wyatt brianwyatt@controlcorrosion.co.uk	
First Name		
Last Name		
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: **Residents of the Parish of Acton Trussell, Bednall and Teddesley Hay, and of the Stafford Borough primarily residents of Weeping Cross and Wildwood Ward and Baswich Ward**

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

Paragraph	Paras 9.7 to 9.10, pages 102 and 103. Paras 12.1 to 12.7	Policy	HC 19 Habitats Regulation. Cannock Chase SAC.	Policies Map	036c
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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 (Regulation 19) April 2024, 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) and it appears to breach the NPPF.**

**We ask for site 036c to be deleted, in its entirety, from the Plan. Our reasons are detailed in a series of Part B submissions:**

## **IMPACT ON AONB**

The Cannock Chase AONB is recognised as a highly sensitive area where visitor management is critical. With already planned increasing housing development in the wider vicinity and a growing population, recreational use is predicted to increase. It is acknowledged by the bodies responsible that there is a need to meet recreation demand while in the long-term ensuring that the issues associated with high levels of recreation do not cause damage or lessen the experience for other users.

There are particular nature conservation issues associated with recreation at Cannock Chase and statutory requirements to ensure impacts from increasing recreation use do not have a detrimental impact. It makes no sense to, therefore, identify new housing sites so close to the AONB, particularly when there is no overriding need for development in this locality.

The AONB Management Plan 2019-24 emphasises the importance of maintaining the quality and distinctiveness of the landscape character of Cannock Chase. It calls for new development to be of the highest quality befitting one of the nation's finest landscapes, and for unsuitable new development to be resisted.

Furthermore, Stafford Borough Council's response in the 2022 consultation to the identical proposed housing allocation on its border considered that the proposed housing on site 036c *'...would be in the immediate setting of the AONB and lead to a detrimental impact on the AONB so should not go ahead...'*

Site 036c is part of a corridor between the AONB to the east, and the Staffordshire and Worcester canal within the valley of the Penk, with the River Penk, to the west. These feed into and become a contiguous part of the Radford Meadows Wildlife Trust Reserve during the ever increasing flooding of the Penk valley. This Reserve, close to 036c, is a habitat of a reported 63 bird species (source Landscape Britain) including grey heron, lapwing, teal, snipe, swan, geese and many other species. Otters are present. The site is also home to one of England's rarest tree species, the native Black Poplar. The Reserve itself extends south from Stafford to Deptmore (also known as Deepmore) Lock (No. 42 on the canal); this is WSW of site 036c, by a distance of only some 500m. The River Penk is only a further 405m west.

Many of these 63 species of birds, along with deer, fox, hedgehog, field mouse, grey squirrel and Pipistrelle bat have been reported at site 036c.

Site 036c is only some 1.8km from the boundary of the AONB, across open countryside, and a golf course, with the only significant impediment to wildlife being the A34.

## **Quoting from Policy HC19: Green Infrastructure**

*'The council will support the protection, maintenance and enhancement of a network of interconnected, multi-functional and accessible green and blue spaces.*

*All development proposals should seek to maximise on-site green infrastructure.*

*Where suitable opportunities exist, taking into account local circumstances and priorities, development must demonstrate it has sought to strengthen*



*and promote connectivity with the existing green infrastructure network by:*

- *Providing interlinked multifunctional publicly accessible open space within new development schemes including public open spaces, attractive cycle and walkways, street trees, green roofs and walls, pocket parks, allotments, play areas and new wetland habitats.*
- *Identifying and strengthening potential linkages with green and blue spaces within adjoining developed areas to promote interconnected urban green infrastructure.*
- *Connecting together and enriching biodiversity and wildlife habitats.*
- *Strengthening green linkages with the wider countryside and major areas of open space such as country parks.*

*Development proposals must make adequate provision for the long term management and maintenance of the green infrastructure network.*

*Development proposals should be consistent with other Local Plan policies.'*

**Clearly by allocating site 036c there would be a negative impact on the ability to 'strengthen and promote connectivity with the existing green infrastructure network' within this location for reasons previously set out.**

More likely the proposed allocation will damage it. **More importantly, if the developer then progresses to their incrementally increasing number of dwellings as proposed (as detailed in our comments on DS5) this will totally cut the connectivity between the AONB and the Radford Meadows Wildlife Trust Reserve.**

Furthermore, the DEFRA Magic Map clearly shows this site is within the SSSI impact zones for both Baswich Meadows SSSI and Milfield Quarry SSSI. There appears to be no consideration of these impacts within the site assessment.

The DEFRA map also shows the site is entirely within the Nitrate Vulnerability Zone and adjoining priority woodland.

Related to Policy HC19 we also refer to **Policy NB1: Protecting, enhancing and expanding natural assets:**

We quote selected passages:

*Support will be given for proposals which protect and enhance the quality of the natural environment. The restoration, enhancement and creation of habitats and ecological connectivity will be supported, particularly where these contribute to the Local Nature Recovery Strategy, the Nature Recovery Network and the conservation of species and habitats of principal importance, as well as those listed on the Staffordshire Biodiversity Action Plan.*

*Sites that lie outside of a formal designation, but which meet the criteria for designation whether that be statutory or non-statutory site designation will be afforded the same protection as if it were to be designated, and applications affecting such sites must assess the site against the Local Wildlife Site Assessment Criteria.*

*Valued soils will be protected and enhanced, including the best and most versatile agricultural land, and development should not contribute to unacceptable levels of soil pollution.'*



As detailed in our DS3 objection the site 036c is open countryside, prime and productive farming land, soil Grade 3a. As detailed above it is rich in bird life and a corridor between the AONB and the Radford Meadows Wildlife Trust Reserve.

**It is not apparent that the proposed building on site 036c complies with either HC19 or NB1.**

**It is not considered that efforts to mitigate the damage of building on site 036c, by way of S106 agreements, planning conditions, or biodiversity net gain actions could overcome the loss (or initial reduction) of connectivity between the AONB and the Radford Meadows Wildlife Trust Reserve.**

In our DS3 and DS5 objections we have detailed how, in our opinion, the site 036c is neither necessary nor in the optimum location. In view of these issues, we ask the Inspector to assess if the damage to the environment can be justified.

(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**, 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:

For the transparency of process and the ability to actively participate in the process of plan making.

The very significant numbers of residents who have signed to support these objections / representations and have provided financial support for expert opinion, anticipate having expert professional opinion to support their participation at the hearing by the Planning Inspectorate to ensure that the lack of need and breaches of Policy are brought to the attention of the Inspector.

We have names and addresses of those who have supported this and the related other Part B submissions. We submit these to SSDC but have request that SSDC do not release the full details to the public. We have retained all in hard copy and electronically in case the Inspector wishes to view them.



**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**