

Part B – Please use a separate sheet for each representation

Name or Organisation: **CPRE Staffordshire**

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

Paragraph	Table 8 Page 33 Locality 1 Para 5.28 Page 33	Policy	DS5	Policies Map	Urban Extensions to Neighbouring Towns and Cities South of Stafford. Page 222 Site ref 036c
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4. Do you consider the Local Plan is :

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

CPRE Representation Number 8

Site described in the Plan as:

South of Stafford at Land at Weeping Cross (Penkridge North East and Acton Trussell Ward) (A34 corridor)

and also as;-

Land at Weeping Cross (adjoining Stafford Borough boundary)

The proposed allocation of the site for housing

This is the first of two representations relating to the site, the first raised Duty to Co-operate issues - they should be read together.

The site is a greenfield site in agricultural use.

The site abuts the boundary of Stafford Borough Council (SBC).

Stafford Borough Council has made over-generous provision for additional housing to meet the needs of South Staffordshire (see Paragraph 6.12 of the Adopted Stafford Borough Local Plan 2011 – 2031).

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 the City of Stoke-on-Trent. The Government, through the NPPF, has 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 for Stafford 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.

(Our underlining).

It was agreed with South Staffordshire Council that the town of Stafford would not be extended southward (see Paragraph 3.12 of the Adopted Stafford Borough Local Plan 2011 – 2031).

Extract from Paragraph 3.12

Furthermore, land south of Stafford was identified as a cross border issue to be considered by Stafford Borough Council and South Staffordshire District Council when preparing their new Plans. The West Midlands RSS review process stated that "Dependent upon the outcome of local studies, some of

the Stafford town allocation could be made, adjacent to the settlement, in South Staffordshire District.” Both Councils have been in dialogue concerning future development south of Stafford and a number of evidence based studies have been carried out as well as meetings with relevant landowners and developers. The Plan for Stafford Borough is based on the clear conclusion that development in this location is both less practical and less sustainable than at other locations around Stafford town, and it is therefore not proposed to identify significant development south of Stafford in the new Plan.

(Our underlining)

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Plan%20for%20Stafford%20Borough/PFSB-Adoption.pdf>

Stafford Borough Council is significantly exceeding its housing targets of 500dpa (now averaging over 600dpa) and is providing both for its own needs and for adjacent District Councils such as South Staffordshire, as shown on [SBC's Land for New Homes – The Housing Monitor 2022](#).

3.3. Assessment against the Local Plan. The NPPF has placed a renewed emphasis on Local Authorities setting their own housing targets, using robust and the most up to date evidence to determine their local housing requirements. The Plan for Stafford Borough (adopted June 2014) sets the local housing requirement at 10,000 dwellings (2011-2031), with an annual requirement of 500 dwellings per annum. Table 2 shows how this compares with the rate required for the whole plan period and the actual annual coverage.

Table 2 - Completion Rates Plan Period
Completion Rate (Number of Dwellings per Year)
Annual Target (2011 - 2031) 500
Annual Completion Average (2011 - 2022) 609
Cumulative Completions (2011 - 2022) 6,702
Remaining Balance (2022 - 2031) 3,298

A southern extension of the town is clearly wholly inappropriate and unnecessary.

In its Regulation 19 Local Plan South Staffordshire refers to the site in its category of 'Urban Extensions to Neighbouring Towns and Cities'. It is the only case involving an extension to a town adjoining South Staffordshire and the only instance where the neighbouring authority neither wants nor needs the site allocating for development.

We fail to see the reasoning for the allocation bearing in mind that:

- The site has previously been refused planning permission (the subsequent appeal was withdrawn before the Informal Hearing)
- The site does not serve the needs of South Staffordshire, as described in the Plan, nor would it serve the needs of the Black Country authorities.

- South Staffordshire is demonstrably over-allocating for its own needs (with no justification - see our precious detailed representations on housing numbers, windfalls and densities.
- This, and other, greenfield sites are simply not needed.
- No tenable reason has been demonstrated to justify the site's allocation for housing.

(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.

We have failed to find any justification for the inclusion of this site as a Housing Allocation and we request its **Deletion from the Plan**.

In this case we do not consider that any modification, other than deletion, would 'make sound' this element of the Plan.

Note: given the site's close relationship to the town of Stafford we would ask that, if representations are to be heard in the Examination in Public, this element should be heard in a session open to the public to attend in Stafford itself especially as it is difficult for Stafford residents to reach Codsall by public transport.

(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:

This representation and the first representation relating to this site raise both Duty to Co-operate and Site Selection and Allocation Issues. If the site, and the issues it raises, are to be considered at a hearing session we would suggest that our participation would be appropriate.

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.