

	<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 2018 - 2039**

**Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022**

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	Mr	
First Name	Alex	
Last Name	Yendole	
Job Title (where relevant)	Strategic Planning Manager	
Organisation (where relevant)	Stafford Borough Council	
Address Line 1	Civic Centre	
Line 2	Riverside	
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Post Code	ST16 3AQ	
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## Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

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

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.

Thank you for the opportunity to respond to the South Staffordshire Local Plan Publication Plan 2018 – 2039 consultation document.

As Stafford Borough is a neighbouring authority to South Staffordshire District a number of the strategic key issues and growth options could have development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham Housing Market Area nor the Greater Birmingham & Solihull Local Enterprise Partnership (LEP) area.

It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the South Staffordshire District area. On this basis, in terms of the future housing provision, Stafford Borough considers that the preferred option of meeting the current local housing need of 4,097 plus 4,000 new homes towards the Black Country shortfall is the



most appropriate approach, noting the impact on the West Midlands Green Belt covering much of South Staffordshire District and the need to minimise infrastructure implications for neighbouring areas.

Furthermore it is considered that the Publication version of the Local Plan is appropriate in terms of addressing the employment land provision. In general it is considered that the preferred option will facilitate a mix of urban and rural housing solutions to deliver economic growth whilst seeking to protect the high quality environments across the Local Plan area. With regards the delivery of new housing locations, the Borough Council supports an appropriate balance across Tiers 1 to 3 based on access to services and facilities together with a focus on maximising the use of brownfield land. This will ensure future sustainable development by utilising existing and new infrastructure provision due the Green Belt position.

Nevertheless it should be noted that the Borough Council has significant concerns in terms of Policy DS5 and Table 8 regarding an urban extension of Stafford Town arising from new development being identified on the southern boundary of Stafford Borough for 81 houses on a site of 3.85 hectares in the A34 corridor, Weeping Cross south of Stafford as part of Locality 1, Site 036c. This would not appear to accord with Strategic Objective 2 of the New Local Plan Publication as a sustainable approach to meeting the needs of the Greater Birmingham Housing Market Area. In particular it is considered that this location is less sustainable and deliverable than other sites in South Staffordshire adjacent to or in close vicinity to the Black Country authorities where housing need is originating. Therefore reference to this new development should not have been included in the New Local Plan, including reference in Policy DS5, Table 8, Policy SA5 and the proforma in Appendix C.

Furthermore such a development does not demonstrate it would provide appropriate infrastructure to mitigate the impact. There is no relationship to the existing urban form. The site is remote from any settlement or services in South Staffordshire, with the occupiers of the development looking to Stafford Town to provide their services. Accordingly this will impact on schools and leisure provision in Stafford, which have a number of capacity issues. To date further details have not been provided to demonstrate the



following, with limited information in the latest Infrastructure Delivery Plan published alongside the Local Plan preferred option:

- that education impacts in Stafford Borough can be acceptably mitigated;
- that contributions to meeting Stafford's affordable housing need and providing for leisure facilities in Stafford would be secured; and
- that impacts on the landscape, including the setting of the Cannock Chase Area of Outstanding Natural Beauty (AONB), would be acceptable.

In terms of the issues listed above the Borough Council would put forward evidence provided by Staffordshire County Council education via the link below, which demonstrates that this area of Stafford Town - south is not able to accommodate further school provision, reference page 7.

<https://www.staffordbc.gov.uk/stafford-borough-education-site-assessment-report>

However it is also noted that Staffordshire County Council education provided the following statement through a response to the Stafford Borough Local Plan 2020-2040 Preferred Option on 12 December 2022 regarding the proposed allocation in the South Staffordshire Local Plan Publication version:

*“For information, we note that South Staffordshire District Council have identified a small site for 81 dwellings in the Local Plan Review Regulation 19 Publication Plan Consultation, November 2022. This level of housing would be expected to generate 17 primary aged pupils. Education contributions will need to be secured from this development towards additional primary school places.”*

The Stafford Borough Economic Housing Development Needs Assessment, on page 164 within Table 12.1 sets out a figure of 208 new affordable homes required for Stafford Town. Therefore through the Duty to Co-operate process the Borough Council looks forward to receiving confirmation that the affordable housing



provided by this site, if adopted within the Local Plan, will make its contribution of 24 new homes to the Stafford Town affordable housing need.

The protected landscapes of the Cannock Chase Area of Outstanding Natural Beauty (AONB) are also a critical part of the Borough's rich natural environment. The AONB boundary is less than 1km from the edge of Stafford and the proposed allocation. Therefore development to the south of Stafford Town settlement boundary would be in the immediate setting of the AONB and lead to a detrimental impact on the AONB so should not go ahead. Reference to avoiding detrimental impacts, and conserving and enhancing Cannock Chase AONB, and its setting, for its landscape and natural beauty and the services it provides indirectly as a result of its special qualities is sought through the South Staffordshire Local Plan 2018-2039 to reflect guidance in the AONB Management Plan, as well as the Views and Settings Guide.

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. The Plan has been prepared by the AONB Partnership, which includes its 5 constituent local authorities (Staffordshire County Council, Cannock Chase Council, Lichfield District Council, South Staffordshire Borough Council, and Stafford Borough Council), and is a material consideration.

The relationship between the AONB and its setting is highlighted within PPG guidance notes which states the following: *“Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.”* (Paragraph 042 Reference ID: 8-042-20190721, 27.07.19)”



With regards to future provision outside of South Staffordshire District, the Borough Council can confirm it is not in a position to meet any of the shortfall arising from the Black Country at this stage and furthermore can not provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.

The Borough Council also notes the area of search along the A449 corridor for a new settlement beyond the plan period, after 2039 in Policy DS6 which includes the area around Dunston south of the Stafford Borough boundary. However this option, when previously assessed through the GBHMA Strategic Growth Study 2018 was not one of the recommended areas of search for strategic development. Any development in this location would have significant impacts on Stafford Borough. The Strategic Growth Study identified north of Penkridge as a recommended area of search for a strategic urban extension. In our view this warrants further investigation, as an alternative to a new settlement or to new homes south of Stafford. We would therefore be grateful if you could ensure that we are kept updated on the consideration of new settlement options and would welcome the opportunity to comment further, and consider infrastructure implications.

The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council has recently concluded its consultation on the Local Plan 2020-2040 Preferred Option to set out the future development strategy beyond the adopted Plan period of 2031.

The Habitat Regulations Assessment of future housing growth in South Staffordshire District will need to be addressed in order to provide mitigation measures for the Cannock Chase Special Area of Conservation (SAC) together with other relevant SACs / Ramsar sites in the locality. The Borough Council will continue to work alongside South Staffordshire District through the Cannock Chase SAC Partnership on suitable measures.

The Borough Council would welcome an acknowledgement of this response and notes the latest information received on the Duty to





Co-operate Statement with South Staffordshire District Council at this stage of the plan-making process to support delivery of housing and employment requirements in the context of the wider area.

I look forward to hearing from you in due course.

Strategic Planning & Placemaking Manager  
Stafford Borough Council

(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.

Reference to the new development should not have been included in the New Local Plan, including reference in Policy DS5, Table 8, Policy SA5 and the proforma in Appendix C. The new development opposed is an urban extension of Stafford Town identified on the southern boundary of Stafford Borough for 81 houses on a site of 3.85 hectares in the A34 corridor, Weeping Cross south of Stafford as part of Locality 1, Site 036c

(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:

**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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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