



BERKSWICH PARISH COUNCIL

SERVING THE VILLAGES OF
MILFORD AND WALTON ON THE HILL

THE GATEWAY TO CANNOCK CHASE

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Local Plans
South Staffordshire Council
Community Hub
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Dear Sir or Madam

South Staffordshire District Council
Local Plan Review
Publication Plan April 2024 – Regulation 19 Consultation

Berkswich Parish Council restates its previous objection to the inclusion of site 036c Land south of Weeping Cross, Stafford as a housing land allocation in the Publication Plan iteration of the Local Plan. Copies of the parish Council's previous objections to planning submissions and the emerging local plan are attached as Appendix A to this letter. The Parish Council does not consider this proposal satisfies the "**soundness tests**" of paragraph 35 of the NPPF for the following reasons:

- a) The proposal is not **positively prepared**. This site is at the northernmost extremity of the District directly abutting the urban boundary of Stafford town. The plan contains no objective demonstration of housing need within this part of South Staffordshire to justify development in this location. Stafford Borough Council has sufficient housing land availability to meet its own current and projected needs within its borough boundary for the period of this Local Plan. No evidence has been tendered in the Publication Plan or its predecessor documents to show there is any requirement for "overspill" on to this site to accommodate unmet demand from the neighbouring authority. This is explicitly recognised at paragraph 5.28 of the Publication Plan.
- b) The **justification** for inclusion of this site stated at paragraph 5.61 of the Plan is vague and inadequate. While it is not within a Green Belt it would be visible and intrusive in views from the nearby Cannock Chase National Landscape conflicting with landscape protection policies NB3 and NB4 of the Publication Plan. In the absence of robust, evidence based arguments for this proposed allocation it appears as an expedient, random add-on to the plan which is not based on proportionate evidence.
- c) The proposed allocation is not **effective**. It would not address a proven need for housing in this part of South Staffordshire and unreasonably would displace the majority of service requirements into Stafford Borough. Residents of this site would look to facilities in Stafford town for their education, shopping, health and social

needs. Local health and education facilities are already under considerable strain: the additional traffic generated would increase pressure on an already overloaded highway network. The adverse impact of additional demand from this site and how it might be redressed has not been assessed in this plan. The proposal would not represent a potential final and logical rounding-off of development here. The arbitrary subdivision of the existing field would leave a parcel of land at the south end too small and awkward to be used effectively for agriculture after completion of the development. This would inevitably lead to subsequent unwelcome pressure for additional development on the unallocated land.

- d) The Parish Council does not consider that the allocation is **consistent with national policy** because of its failure to deliver sustainable development for the reasons outlined above and the internal contradictions between this proposal and other environmental safeguards in the draft Local Plan. The illogic of the proposed allocation is explicitly recognised at paragraph 5.28 of the Plan:
“This location will not be a focus for larger-scale housing growth. This recognises the sensitive landscape and potential highways 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.”

It is perverse that despite acknowledging the validity of these concerns which have been made repeatedly by local objectors in the Local Plan process the District Council has persisted in including the site among its proposed housing allocations.

Modifications required

Berkswich Parish Council does not consider the allocation of site 036c to be sound. The Parish Council request that the Publication Plan be amended by deleting Site 036c *Land at Weeping Cross west of the A34* from paragraph 5.22 Table 7 Housing Target; from Policy DS5 Spatial Strategy paragraph 5.61; and that the map at p244 of the plan be removed. The Parish Council requests the opportunity to appear in person before the Inspector at any future Local Plan hearing.

Yours faithfully



Mrs Sue Fullwood
Clerk/Responsible Financial Officer

Enc.s: Previous objections by Berkswich Parish Council to the development of this site or its inclusion in the draft local plan for South Staffordshire.

1. Objection to application 17/00505/OUT 24 June 2017
2. Objection to application 18/01031/OUT 1 February 2019
3. Objection to South Staffordshire Local Plan Review - Preferred Options consultation 10 December 2021
4. Objection to Local Plan Proposed Submission version 9 December 2022

1. Objection to application 17/00505/OUT. 24 June 2017

APPLICATION 17/00505/OUT OUTLINE APPLICATION BY GLADMAN HOMES FOR 155 HOUSES AND 55 CARE APARTMENTS, LAND AT CANNOCK ROAD, STAFFORD

Berkswich Parish Council objects to this application for the following reasons:

1. While the applicant has claimed that in the absence of an approved local plan allocation this submission is to address a shortfall of housing land in South Staffordshire they have not demonstrated a need for such provision in this part of the District. The site is immediately contiguous to Stafford Borough where an approved five year supply does exist. Additional housing provision in this area is not necessary.
2. The proposals will generate additional traffic along the A34 Cannock Road and add to congestion at the already congested Weeping Cross roundabouts. This will exacerbate the expected increase in traffic at this busy junction arising from the approved redevelopment of up to 250 homes on the adjacent former police HQ. This will cause serious delays and inconvenience to residents of this parish.
3. The proposals will lead to additional pressure on local medical and school facilities which are already operating at or beyond capacity. This will cause further disadvantage to existing local residents. The suggested S106 contribution to additional school places is considered inadequate; there is no suggestion in the application of the developer offering any assistance to improved medical facilities locally.
4. The site is close to the Cannock Chase AONB and can be viewed from various vantage points therein. Development of this land will represent an outward extension of the urban area of Stafford and be a harmful intrusion into views from the AONB. It is regrettable that while the Design and Access Statement shows a possible distribution of development and screen planting across the site there are no vertical transects showing the height of new buildings relative to contours and the wider landscape setting. This inhibits a full and proper assessment of the landscape impact of the scheme.
5. Insufficient information is provided to show that the development will have no adverse impact on the Cannock Chase SAC.
6. The Parish Council consider the Statement of Community Involvement to be disingenuous and misleading in relation to engagement with local people and organisations. The developer's broadsheet publicising the proposals was circulated on 19 May with no cut-off date for responses and an indication that they were "in the early stages of preparing a planning application". The latter was submitted 12 days later on 31 May – offering little time for the public to respond. Berkswich Parish Council as an interested adjacent authority was not consulted; the developer has not held a public meeting in the locality and declined to attend one organised by local councillors on 21 June. This is a wholly unreasonable and cavalier approach to public consultation which undermines any validity of the SCI.

Berkswich Parish Council strongly encourages your Council to refuse this application.

2. Objection to application 18/01031/OUT. 1 February 2019

APPLICATION 18/01031/OUT

OUTLINE APPLICATION BY GLADMAN HOMES FOR 155 HOUSES AND 55 CARE APARTMENTS LAND AT CANNOCK ROAD, STAFFORD

Berkswich Parish Council objected to the previous application for a nearly identical development on this site in 2017 (17/00505/OUT) and was very pleased that your Council refused planning permission. The Council is unaware of any substantially changed circumstances that would justify a different decision in respect of the current application and again objects to the proposals for the following reasons.

1. While the applicant argues that there is a shortfall in the current five year housing land supply in South Staffordshire they have not demonstrated a need for such provision in in Acton Trussell parish. The site does not adjoin any settlement in South Staffordshire and is immediately contiguous to Stafford Borough where an approved five year supply does exist. Additional housing provision at this location is not necessary.
2. The proposals will generate additional traffic along the A34 Cannock Road and add to congestion at the already congested Weeping Cross roundabouts. It will exacerbate the increase in traffic at this busy junction arising from the current construction of 135 new homes on the adjacent former police HQ. This will add to the already serious delays and inconvenience experienced by residents of this parish.
3. The proposals will lead to additional pressure on local medical and school facilities which are already operating at or beyond capacity. This will cause further disadvantage to existing local residents. There is no suggestion in the application of the developer offering any assistance to improved medical facilities locally nor evidence to show that any further consultation with the Education Authority of CCG since refusal of the 2017 submission.
4. The site is close to and intervisible with the Cannock Chase AONB as acknowledged in the applicants LVIA assessment. Development of this land will represent an outward extension of the urban area of Stafford and be a harmful intrusion into views from the AONB: it will not as argued by the applicants represent an unobtrusive and integrated extension to the urban edge. The additional perimeter planting proposed by the applicant in mitigation will take over a generation to mature and will not alleviate the harmful visual intrusion in the short to medium term.
5. The application site comprises a rolling well treed landscape on the edge of Stafford. It forms an attractive green, rural setting for the urban area with high visual amenity value, readily visible from surrounding roads and nearby public footpaths within Berkswich parish. Erection of a housing estate here will significantly and harmfully alter the appearance of the site and its contribution to local landscape character.
6. The Parish Council strongly criticised the 2017 Statement of Community Involvement for the limited time it had given for public consultation. The Council expressed considerable concern that as an immediately adjoining local authority the developer had not directly consulted it. The Council consider it highly regrettable that the current SCI is an unaltered resubmission of the 2017 document and that again no contact has been made by the developer. The Council suggests that no weight should be accorded to the document.

Berkswich Parish Council strongly encourages your Council to refuse this application.

3. Objection to South Staffordshire Local Plan Review - Preferred Options consultation. 10 December 2021

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW PREFERRED OPTIONS CONSULTATION SITE 036C: LAND AT CANNOCK ROAD, STAFFORD

Berkswich Parish Council objects to the inclusion of Site 036C, land at Cannock Road, Stafford for the development of 168 dwellings as a preferred housing allocation in the emerging South Staffordshire Local Plan.

1. The site is shown at p149 in the consultation document as an “urban extension” to Stafford. Paragraph 4.24 of the document accepts that it is remote from the areas of unmet housing need in the Greater Birmingham Housing Market Area which the plan needs to cater for. It also acknowledges that there is no unmet housing need from Stafford Borough. It is unclear how the site can be considered “strategic” (p48) given its location at the northern extremity of the District where it does not adjoin any settlement in South Staffordshire. Its inclusion is therefore illogical and will fail to address the social and community needs of the area. The claim that its development “will ensure the sustainable delivery of non-Green Belt housing land” is both spurious without evidence that no other suitable sites are feasible and inaccurate in view of the environmental and social harm it would create.
2. Allocation of the site would lead to additional traffic along the A34 Cannock Road and add to congestion at the already congested Weeping Cross roundabouts. This would add to the already serious delays and inconvenience experienced by residents of this parish.
3. The allocation would lead to additional pressure on local medical and school facilities outside the local plan area within Stafford Borough which are already operating at or beyond capacity. This will cause further disadvantage to existing local residents.
4. The site comprises a rolling well-treed landscape surrounded by open countryside on three sides on the edge of Stafford. It forms an attractive green, rural setting for the urban area with high visual amenity value, readily visible from surrounding roads and nearby public footpaths within Berkswich parish. Erection of a housing estate here would significantly and harmfully alter the appearance of the site and its contribution to local landscape character in contradiction of proposed policies NB1 and NB4.
5. The site is close to and intervisible with the Cannock Chase AONB. Development of this land as an isolated outward extension of the urban area of Stafford without regard to landform and landscape would be a harmful intrusion into views from the AONB. This is inconsistent with Strategic Objective 11 of the emerging plan – to protect key natural assets such as Cannock Chase Special Area of Conservation.

Berkswich Parish Council seeks that Preferred Options site 036C, Land at Cannock Road, Stafford is deleted from the next stage of the emerging Local Plan.

4. Objection to Local Plan Proposed Submission version 9 December 2022

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW PROPOSED SUBMISSION VERSION (REGULATION 19 PUBLICATION STAGE) SITE 036C: LAND AT WEEPING CROSS, CANNOCK ROAD, STAFFORD

On 10 December 2021 Berkswich Parish Council responded to your Council's Preferred Options consultation with an objection to the inclusion of Site 036C, land at Cannock Road, Stafford within the draft local plan (copy attached). Berkswich Parish Council is extremely concerned to note that, notwithstanding considerable local objection to the proposed site allocation, it has been included in policy DS5 of the Proposed Submission Plan as *Development adjacent to the town of Stafford - Land at Weeping cross west of the A34 and in Locality 1 at para 5.28 Southern Edge of Stafford (A34 corridor*, and is shown in the Spatial Housing Strategy table at para 5.21.

The Parish Council does not consider that inclusion of this site within Policy DS5 of the Submission Version Local Plan satisfies the tests of Soundness and Legal Compliance required by paragraph 35 of the NPPF. By its own admission South Staffordshire Council accepts at paragraph 5.28 that the site is remote from the unmet needs of Greater Birmingham and the Black Country and that there is no unmet housing need in Stafford Borough immediately adjacent – issues raised in paragraph 1 of the Parish Council's previous letter of objection. It is contradictory and illogical therefore to promote the site as "strategic" (DS5 page 51) and an urban extension to Stafford when there is no local demand for development or capacity for local services to accommodate the additional users generated. Table 5.21 shows the site as meeting only 0.8% of the housing target for the district which combined with its remoteness from areas of housing need underlines the argument that it is neither strategic nor a suitable location for delivering the objectives of the Local Plan.

The District Council also acknowledge the highway and landscape sensitivities arising from development of the land (points 2, 4 and 5 of the Parish Council's previous objection). The intrusion of development here into the setting of Cannock Chase AONB and the wider local countryside is not compliant with environmental protection policies outlined at policy DS3. In these circumstances inclusion of the site in the plan is perverse and harmful and does not meet the criterion of being *Positively prepared*.

The proposal is not *Justified* both for the reasons outlined above and because no evidence is adduced to show that there is no reasonable alternative.

The draft plan is not *Effective* in that, while seeking justification as an urban extension to Stafford it does not show agreement with Stafford Borough Council that development here will help address housing or community needs in the adjacent local authority area. The Stafford Local Plan Issues and Options consultation 2020-2040 (November-December 2022) shows that Stafford Borough has adequate housing land availability to meet projected needs throughout the plan period without need to rely on cross border allocations with adjoining local authorities.

Berkswich Parish Council is very disappointed that its previous representations (and those of many nearby local residents in Stafford) have been disregarded in the publication of the Submission Plan. The Council does not consider that the document satisfies the tests of Sustainability or is an appropriate response to past Community Involvement.

The Parish Council does not consider the Submission Plan to be either sound or sustainable in respect of site 036C Land at Weeping Cross, Stafford and requests that this site be deleted.