



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*

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	Para 11.8 to 11.10 Para 11.4 page126. Para 11.11 to 11.16 pages 129 to 131	Policy	EC11	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, 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 SERVICES IN WEEPING CROSS AND STAFFORD

It is clear from previous representations to the Council that the residents of Wildwood have significant concerns regarding the ability of local schools and health facilities to cater for the increased demand. In respect of schools the publicly available data (as at 23.05.24) shows that all the closest schools are full:

Oak ridge oversubscribed by 9(219/210)
Walton High oversubscribed by 1(211/210)
Leasowes Primary oversubscribed by 8 (428/420)

Thus, the key local schools to site 036c are oversubscribed. Children will need to travel by road to school, either in school transport (provided by Staffs CC Education Dept.) or in parents vehicles. This is not consistent with the policies EC9 Protecting community services and facilities, EC11: Infrastructure or EC12: Sustainable transport.

The SSDC's Housing Selection Topic Paper at Section 5.27 asserts at para. 5.27.5 that the proposal has been assessed as '*having major positive impacts against (assumed to mean in respect of; i.e. in favour of) education*' based only upon the '*....site's proximity to local schools*'. It is evident from the data above that the proximity does not equate to access or availability.

Stafford Borough Council's response in the 2022 consultation to the identical proposed housing allocation on its border considered that the proposed did '*... 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.*'

SBC further provided evidence provided by Staffordshire County Council education via the link below, (and still understood to be the case) which demonstrates that '*this area of 'Stafford Town - south' is not able to accommodate further school provision.*'

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

This report states, in respect of the site 036c proximity:
NOTE the 'Red' classification, no mitigation possible:

Red - No mitigation possible on existing sites at all required education phases
Orange - mitigation possible at all education phases but only in specific school catchment area within the planning area and/or with new school(s)
Yellow - mitigation possible at all education phases with capacity increases or potential expansions
Green - mitigation possible at all education phases



Primary Planning Area	Primary Capacity	Primary Additional Notes / Associated Secondary Planning Area
Stafford South 6 primary schools	Expected to be no available places across Stafford South planning area based on current pupil movement and modelling. High level indicative studies suggest that on paper primary school sites in this area are not large enough to accommodate expansion.	Primary schools in the planning area are located within the catchment area of Walton High School which may have limited potential for expansion based on high level indicative studies (read full report for Stafford Secondary planning area). As high-level indicative studies suggest there is no potential to mitigate the impact on primary provision at existing schools in this planning area, any development proposed would need to be sufficient to deliver a new primary school on-site (750+ dwellings).

The increase in traffic on already congested roads, with resulting air pollution, is also a local concern. Travelling south, the increase in traffic on Acton Hill Road and through the Parish is a particular worry; the existing traffic using it as "cut through" to the M6 is already causing extensive damage to the carriageway and verges, plus it makes the otherwise very pleasant lane an unpleasant and dangerous place to walk. Much of the traffic already travels at speeds that encourage accidents on blind, narrow, bends. If site 036c were to be developed this would aggravate and existing damaging situation.

Wolgarston School in Penkridge is full/oversubscribed.

Travelling times from site 036C, north, into and through Stafford are extended by severe road congestion; this is unlikely to be improved by the introduction of cycle lanes on the A34 on Radford Bank. The environmental impacts of these extended travel times will be high.

Site 036c is an unsustainable location for growth. Despite its proximity to Stafford, it is a rural community. Private vehicles will be needed for most journeys. There is poor public transport with a limited bus services which are further impeded by significant traffic congestion if travelling into Stafford. Whilst Stafford does have a main rail station, access to it from site 036c will be impeded by these factors

GP's surgeries in the area are already operating with excessive practice lists per GP.

None of these concerns appear to have been fully considered when the site's allocation was re-affirmed in the 2024 SSDC PP.

Quoting from SSDC 2024 PP:

'EC11: Infrastructure

Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.

The council will work with infrastructure providers, agencies, organisations and funding bodies to enable, support and co-ordinate the delivery of infrastructure to support the delivery of the growth identified within this Plan.

Developers and landowners must work positively with the council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.

New development will be required to deliver or contribute towards the timely



provision of essential supporting infrastructure either directly as part of the development, or through an appropriate financial contribution.

The infrastructure requirements for the strategic sites allocated within this Plan will be set out via their corresponding policies, master planning process and IDP.

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

It is not evident that the site 036c does, or can, meet these requirements.

Further, it is not evident that the proposals for site 036c, can meet the requirements of EC9 Protecting community services and facilities, EC12: Sustainable transport or HC15 Education.

(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.

As there is insufficient evidence to support the case for this proposed site allocation we would recommend that the proposed site is deleted, 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, 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 or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX