

## Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Staffordshire County Council
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#### Q1. To which Main Modification (MM) does this representation relate?

MM:	79
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#### Q2. Do you consider the Main Modification is:

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

#### Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.

Your representation should relate only to the Proposed Main Modifications.

MM79 proposes to change the name of the road where Vehicular access will be taken from Cannock Road to Lichfield Road, as we understand for consistency with the name of the allocation. However, whilst the A5190 fronts the whole site the name of the road changes at the existing roundabout with Heath Way. The A5190 is named Cannock Road to the east of the Roundabout and Lichfield Road to the west. Therefore, the proposed allocation only has a very limited frontage to the section of the A5190 named Lichfield Road. The stretch of Lichfield Road fronting the allocation has limited scope to provide an access and we assume this was not the intention of the modification and that access could be taken from the Lichfield Road or Cannock Road sections of the A5190. We therefore propose for avoidance of doubt that the road number be referred to in the context of access location in the policy rather than the road name.

It is also noted in the track change version of the Plan in the paragraph 'Proposed use' (pg 192) there is another change of road name in relation to primary access. However, we cannot find a corresponding modification in the schedule of main or additional modifications to reference against.

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*(Please continue on a separate sheet if necessary)*

**Q4. Please set out the change(s) to the Main Modification that you consider necessary to make it legally compliant and sound, in respect of legal compliance or soundness matters you have identified at Q.3 above.** You will need to say why each change 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. If you support the modification, please skip this question.

1 - MM79 – new text proposed in red with text to be deleted struck out.

Vehicular access will be from **the A5190** ~~Lichfield Road~~ and will serve the residential area within parcel C116a.

2 - Change on page 192 of track change local plan

Proposed Use: The development will deliver in the region of 700 dwellings, and provision for a new primary school and Community Parkland with primary access from **the A5190** ~~Lichfield Road~~.

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(Please continue on a separate sheet if necessary)

**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

(Please continue on a separate sheet 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.

Signature:		Date:	24/11/2025
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For Office Use	Part B Reference	
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## Part B: Representation Form

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### Part B: Representation

Name and Organisation:	Staffordshire County Council
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#### Q1. To which Main Modification (MM) does this representation relate?

MM:	81
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#### Q2. Do you consider the Main Modification is:

A. Legally compliant Yes: ☒ No: ☐

B. Sound Yes: ☐ No: ☒  
(Please tick as appropriate).

#### Q3. Please give details of why you consider the Main Modification is or is not legally compliant or sound. Please be as precise as possible.

Your representation should relate only to the Proposed Main Modifications.

In our Reg 19 consultation response we raised concerns over the effectiveness of Policies SH1 and SH2 in co-ordinating the delivery of infrastructure across the two allocation as both sites are reliant on each other for transport and education infrastructure. Neither site can build out without infrastructure first having been delivered on the other. We will not revisit that point again here but focus on the modification itself.

Policy SH1, Parcel C116a Fourth Paragraph (bullet point f. in the track change Plan) refers to the provision of a site for a 2 form entry primary school and its transfer to the Education Authority. The original wording required the school site to be transferred prior to any dwellings being completed. We accepted that this was impractical and were content for the wording to be amended but retained a necessity for the school to be delivered early in the development. We accept the inclusion of the word 'early' in the third sentence in relation to agreeing a strategy for the early delivery of the school. The remaining additions to the third sentence and changes to the fourth sentence are not accepted. They confuse the matter by conflating the strategy with the site transfer provisions, which is where reference to the S106 was relevant. They also conflict with the provisions in paragraph 5 (point g. in the track change Plan), which sets out provisions for phasing and funding of education and highway infrastructure. There is also no link between the delivery of the school and a 'need' for phased completions.

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In short MM81 is unclear and confuses the interpretation of the policy.

*(Please continue on a separate sheet if necessary)*

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In order to address the points raised above we request that:

- the new text proposed at the end of the third sentence be removed as it is not relevant, necessary or substantiated; &
- the entirety of the fourth sentence be deleted as reference to the S106 is no longer valid.

These changes will ensure consistency with the provision set out in the paragraph g. in the track change Local Plan

The site will provide 2.3 ha of flat, level land of a regular shape with significant road frontage to the adoptable highway to accommodate a new 2FE Primary School. The school site and access, as shown on the concept plan, shall form part of the first phase of development and be transferred to the County. Prior to the planning consent being issued for Site SH1 a strategy for the **early** delivery of the Primary School shall be agreed between the applicant, Staffordshire County Council and the Local Planning Authority ~~which takes account of the need for phased completions. No completions shall take place on SH1 until the school site has been transferred in accordance with the requirements of the County Council as set out in a S106 agreement.~~ Development will be subject to proportionate primary and secondary education contributions as requested by Staffordshire County Council, where evidenced by need

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(Please continue on a separate sheet if necessary)

**Q5. Do you have any comments on the Sustainability Appraisal, Habitats Regulations Assessment or Policies Map changes in respect of this particular Main Modification. Please comment in the box below.**

(Please continue on a separate sheet 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.

Signature:

[Redacted Signature]

Date:

24/11/2025

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