

	<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 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\*

*\*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	Dr & Mrs	
First Name	Christopher & Judy	
Last Name	Jones	
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:

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

Paragraph   
Page 99

Policy

Policies Map

4. Do you consider the Local Plan is :

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

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 does not appear to have been the subject of effective 'duty to co-operate' liaison with Stafford Borough Council (SBC). We ask for site 036c to be deleted, in its entirety, from the Plan.

Our reasons are:

The use of site 036c fails Policy HC14 'Health Infrastructure' in the South Staffs Publication Plan (SSPP) Page 99.

HC14 states "*Proposals for major residential developments or specialist elderly accommodation must be assessed against the capacity of existing healthcare facilities through engagement with the relevant Integrated Care Board ICB (formally Clinical Commissioning Groups - CCGs)*".

SSDC has not made local Health provision for this development. The nearest GP surgeries are in Stafford Borough.

The 29 October 2019 Care Quality Commission Report cites a total of 19,700 patients for 4 full time and 7 part time doctors at the Weeping Cross, Beaconside and John Amery Drive sites.

*"Weeping Cross Medical Centre is a member of NHS Stafford and Surrounds Clinical Commissioning Group. The main site and two branches currently run separate patient lists and offer GP services to 10,000 patients at Weeping Cross; 7,000 patients at*



*Beaconside and 2700 patients at John Amery Drive."*

*"The provider has eight partners, seven of whom are clinical and part time and one is a business partner. The partners also employ four salaried GPs and four ANPS".*

The practice website currently also cites 7 Clinician Partners and 4 salaried GPs. Even counting the 7 part time clinicians as full time the patient doctor ratio exceeds the National Average of 1,700 quoted by the Office for National Statistics in October 2022. Allowing for part time at 60% would take the figure to around 2,400 patients per doctor far in excess of the ONS National average.

ONS Trends in patient-to-staff numbers at GP practices in England: 2022

*"In England, the number of patients per doctor (trainee and fully-qualified) at GP practices was 1,700 in October 2022."*

Stafford Borough Local Plan 2020-2040 page 95 Policy 37 Infrastructure to support new development states:

*A new development that generates a demand for infrastructure will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either:*

- 1. Already in place; or,*
- 2. There is a reliable mechanism to ensure that it will be delivered in the most appropriate place, to the required standard and when required.*

The Parish of ATBTH offers no health facilities and SSDC appear to have made no provision to expand health services in the locality to meet the additional needs required by the development, 036c.

Our understanding from our Parish Council is that Stafford Borough are opposed to this development on their southern border as set out in our objection under Policy DS5 Spatial Strategy.

*"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. This expressed joint conclusion has not been taken into account in the South Staffs Publication Plan."*

In respect of site 036c in the South Staffs Publication Plan, we consider the Plan to be unsound and failing in its legal 'duty to co-operate' (SSPP 2020-2040 page 11 para.3.6).

(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.

Delete, 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

**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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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