

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<p>Ref:</p> <p>(For official use only)</p>
---	--	---

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	
First Name	William	
Last Name	McKeown	
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: William McKeown

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

Paragraph	9.2, Page 100.	Policy	HC15 Education	Policies Map	Page 235 Site ref 036c
-----------	----------------	--------	----------------	--------------	------------------------

4. Do you consider the Local Plan is :

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

I 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).

I ask for site 036c to be deleted, in its entirety, from the Plan.

My reasons for this are:

A) The proposed development will generate further strain on Stafford Borough's education provision that is already significantly overpopulated. High schools in the southeast of Stafford are full and education for disabled children is a particularly prominent example of the current and projected lack of educational services available in the southeast of Stafford. The publication plan stipulates that:

'Support will be provided for the expansion and/or improvement of educational facilities or the construction of new schools to meet demand generated by children in new development or to deliver necessary improvements and updates to education infrastructure.'



There are currently no plans for the development of educational infrastructure in the area and as such the development is unsound and unsustainable.

B) According to the assessment of potential education sites in the Stafford Borough Council Local Plan 2020-2040 [<https://www.staffordbc.gov.uk/stafford-borough-education-site-assessment-report>], the only available capacity for secondary schools will be on the other side of Stafford to site 036c: *'Any available capacity is likely to be at schools in the Southwest of the town including King Edward VI High School, Stafford Manor and Blessed William Howard'* meaning that the proposed site 036c would either put unjustified strain on local secondary schools that are already at full capacity, or would put unneeded pressure on Stafford Borough Council's transportation network to transport pupils to secondary schools in the southwest. Regarding primary schools in South Stafford, the document states that there are *'[e]xpected to be no available places across Stafford South planning area based on current pupil movement and modelling'*. Furthermore, *'High level indicative studies suggest that on paper primary school sites in this area are not large enough to accommodate expansion'*. Finally, *'As high-level indicative studies suggest there is no potential to mitigate the impact on primary provision at existing schools in this planning area'*. This series of quotes draws attention to the unviability of development at site 036c due to current and projected inadequate educational facilities in the southeast Stafford area and therefore renders it unsound.

B) Additionally, the plan 'seeks to protect existing education facilities as well as provide contributions towards new and/or facilities where required, and ensure they are in sustainable and accessible locations.' This is not met. The location is not sustainable because, as schools in the immediate vicinity are full and are not projected to expand, it is likely that students will have to travel across Stafford and other parts of the Borough, placing further strain on infrastructure designed to get children and students to school.

C) Further to this, the proposed site is part of SSDC and will be using Stafford Borough Councils' facilities, in an attempt to draw from neighbouring council's amenities, without contributing to their maintenance, development, or upkeep. This is in direct breach of point 3, subsection 24 of the National Planning Policy Framework that states 'local planning authorities [...] are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.' As SSDC have elected to propose development directly on the border they share with Stafford Borough Council, the infrastructural impact of this development of 81 new homes, and the significantly more that will likely follow, is undeniable and will cross administrative boundaries. This is one of the many reasons that SBC are united in opposition of this development. In line with the National Planning Policy Framework, the proposed plan for development is unsound and lacking in a duty to co-operate.

D) SSDC's consultants, Lepus rated the site's access to education as a major positive in their audit of the land. However, this does not take into account the previously outlined point that, not only are all of the local schools confirmed as full, but there are also no plans for expanding educational institutions near to the site. The removal of such a significant false positive will alter this section of Lepus' appraisal of the land and mean that the consultant's assessment of it would be reversed. Therefore, key aspects of the recommendation that site 036c be included in the Publication Plan are demonstrably



unfounded assumptions that education is readily available, and this is another reason why the proposed site is unsound.

(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.

I propose that the development at 036c be deleted from the proposed plans due to the reasons stated above.

Furthermore, there are 1.9 hectares owned by a public authority and 2.5 hectares not owned by a public authority deemed suitable for development in SSDC and I propose that these areas are used as an alternative. Equally, area surrounding Penkridge has been outlined as an area for strategic development in policy SA2, that would not provide the contentious issues of being situated on the boundary between authorities and would not be a breach of duty to co-operate.

(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:

The considerable numbers of residents who have signed to support these objections and have provided financial support for expert opinion, expect to have an expert professional opinion to support their participation at the hearing by the Planning Inspectorate. This is to ensure that the lack of need and breaches of Policy are brought to the attention of the Inspector.

***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