

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<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*	2. Agent's Details (if applicable)
<p><i>*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.</i></p>	
Title	<input style="width: 90%; border: 1px solid black;" type="text" value="Dr"/>
First Name	<input style="width: 90%; border: 1px solid black;" type="text" value="William"/>
Last Name	<input style="width: 90%; border: 1px solid black;" type="text" value="McKeown"/>
Job Title (where relevant)	<input style="width: 90%; border: 1px solid black;" type="text"/>
Organisation (where relevant)	<input style="width: 90%; border: 1px solid black;" type="text"/>
Address Line 1	<input style="width: 90%; border: 1px solid black;" type="text"/>
Line 2	<input style="width: 90%; border: 1px solid black;" type="text"/>
Line 3	<input style="width: 90%; border: 1px solid black;" type="text"/>
Line 4	<input style="width: 90%; border: 1px solid black;" type="text"/>
Post Code	<input style="width: 90%; border: 1px solid black;" type="text"/>
Telephone Number	<input style="width: 90%; border: 1px solid black;" type="text"/>
E-mail Address (where relevant)	<input style="width: 90%; border: 1px solid black;" type="text"/>



## 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	5.60, 5.61,	Policy	DS4 Development Needs	Policies Map	Page 235 Site ref 036c
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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) There is a clear lack of need for the proposed development. Policy DS4: Development Needs outlines that it will deliver:

*'4,726 homes over the period 2023-2041 to meet the district's housing target, whilst providing approximately 10% additional homes to ensure plan flexibility. This housing target includes the district's own housing requirement of 4,086 homes, plus a 640-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area'.*

The supposed 'needs' of this plan significantly outweigh the government's specified requirement (4086) for development by over 600 new homes (NH) and the proposed '10% sic.' incorporated for flexibility is making an alarmingly generous use of the term 'approximately'. A 10% variance on the government prescribed requirement works out at 408 new homes. There, even allowing a 10% variance for flexibility equates to 4494 new homes. The 81 NH proposed at site 036c should be taken out of the surplus (232 NH) given that the site is situated on the border with Stafford Borough Council, who are in opposition to this development. The contention here can easily be avoided by removing the site from the SSDC publication plan.

B) Further to this, development at site 036c sets a dangerous precedent to future planning as it represents a district council developing from their borders inwards, as opposed to what Policy DS4, paragraph 5.61 upholds as best practice, focussing *'the majority of growth on the district's most sustainable settlements'*. As Stafford is not in SSDC's remit, claims that site 036c is 'sustainable' are undermined by the convenient factor that Stafford Borough Council will be required to fund and provide any healthcare, educational or infrastructural related developments that the development requires. This is despite the claim made by Policy DS4, paragraph 5.61 to facilitate *'the delivery of key infrastructure where opportunities are presented'* no examples of supporting infrastructure to site 036c are detailed, likely because they do not fall under the remit of SSDC.

C) Moreover, the inclusion of site 036c in the Publication Plan is unsound based on the need for housing locally. SBC have already provided significantly more housing than the requirements stipulated by the government in areas proximal to site 036c. This has significantly boosted the availability of housing in the area and placed further strain on local public services. Not only does this dissolve any need for housing at 036c, but it also means that any attempts to qualify the location of site 036c as 'sustainable' are founded on assumptions and have not been rigorously inspected.



D) Though SSDC make a basic attempt to recognise Stafford's lack of need for new housing in paragraph 5.28 of Policy DS3 Open Countryside, their own statement seems to foreground the redundancy of the site's development and call into question their underlying motivations. In paragraph 5.28 it is stated that:

*'This location will not be a focus for larger-scale housing growth. This recognises the sensitive landscape and potential highway 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. Instead, a smaller scale extension to the adjacent town of Stafford will be delivered in this area, which will ensure the sustainable delivery of non-Green Belt housing land in the district'.*

The paragraph above outlines four reasons why the inclusion of site 036c in the Publication Plan is unsound: the sensitivity of the landscape, its remoteness to areas where unmet needs are generated, highway concerns, and the lack of need for new housing in Stafford Borough Council. This evidences that, despite convincingly making the case that the development of this land is illogical, SSDC intend to persist with it. This is likely because, as has been previously mentioned, site 036c is conveniently located on the boundary of Stafford Borough Council and as such SSDC would attain all financial benefit from the development of the site without having to provide any amenity.

Furthermore, the inclusion of site 036c is unsound because the first sentence that reads *'[t]his location will not be a focus for larger-scale housing growth'* is likely false and, if so, highly unethical. There is a history of previous development plans at 220 new homes, and then reduced to 151, rejected in 2017. The proposed number of 81 new homes is likely gateway plan to establish development with options to expand extensively further down the line. Barrett Homes, formerly Gladman, have a history of being associated with strategies that force through a relatively innocuous-seeming small number of new homes, that contain options for significant expansion. The likelihood of further expansion beyond the 81 proposed new homes has been confirmed by an independent inspector who noted that there is no clear defensible southern boundary to the site, and housing development could feasibly continue southwards, past an arbitrarily drawn border if this plan is upheld. This represents both a reason why SSDC would be eager to include a small development on the boundary between SBC and SSDC despite their provided reasoning for the development at site 036c being a destructive and redundant prospect. I feel that SSDC, by their own logic, justify the exclusion of site 036c in the proposed Publication Plan as site is unsound. Further, their keenness to persist with the development, despite its unsuitability, suggests that the inclusion of the site is unethical because of the developer's track record of using underhand tactics to push through development and subsequent inordinate expansions as mentioned above. I therefore question the legal and moral soundness of the inclusion of site 036c in the proposed Publication Plan and ask that it be deleted in its entirety.



(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 have outlined a clear rationale as to why site 036c should be removed from the Publication Plan. Not only is there a surplus of development in the plan that significantly exceeds the reasoning of '10%' variance for flexibility, but its situation on the border with Stafford is an undeniable point of contention that compounds an underlying lack of need. Therefore, propose I propose that the development at 036c be deleted from the proposed plans due to the reasons stated 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:

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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX