

	<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>
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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	
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 Policy Policies Map

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 reasoning for this is as follows:

A), The primary justification that SSSDC makes to include site 036c as part of the Publication Plan is that it is sustainable (which I have already noted to be false with reference to a lack of housing need in the neighbouring borough and a non-existent duty to co-operate) but also that it is non-green belt land. This appraisal fails to take into consideration that the land is part of Cannock Chase Special Area of Conservation, meaning that the Plan is has failed to consider policy NB3:

'Development will only be permitted where it can be demonstrated that it will not be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (CCSAC)'



If the proposed development at site 036c goes ahead, sections of the CCSAC will be lost forever. According to an independent planning inspector, it is likely that significantly more homes than the proposed site of 81 homes will follow if this plan is approved. This constitutes a direct and significant '*adverse effect upon the integrity of CCSAC*' that cannot be disputed. The indirect impact of the inclusion of site 036c is also significant as increased development in such proximity to Cannock Chase AONB will result in increased footfall and therefore exert extra pressure on facilities and infrastructure of the chase. The above considerations are clearly not present in SSDC's tests of soundness, and I therefore recognise the inclusion of site 036c as unsound.

C) Furthermore, the Publication Plan's justification of site 036c as 'sustainable', relies on the use of Stafford Borough Council's amenities and symptomises a clear lack of consultation with the neighbouring district and therefore incompliance with a duty to co-operate. The destruction of classical rolling countryside that is also within the boundaries of the Cannock Chase Special Area of Conservation for a development that is both opposed to and unneeded in the Stafford Borough seems to suggest that SSDC have prioritised their own convenience above several national planning policies in the inclusion of 036c in the Publication Plan.

(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.

I suggest that should SSDC need to persist with exceeding the government requirement for new housing, they should consider the area surrounding Penkridge that has been outlined as an area for strategic development in policy SA2, which 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