

## Part B – Please use a separate sheet for each representation

Name or Organisation: Adele and Thomas Williams

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

Paragraph	5.7 Pages 25 to 27	Policy	HC15 Education	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 type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input 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.

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 has evidently not been the subject of effective 'duty-to-co-operate' in terms of liaison with Stafford Borough Council (SBC).

We ask for site 036c to be removed entirely from the plan.

The plan is not legally compliant because it does not comply with National Planning Policy Framework, 19 December 2023. Compliance with the NPPF is a legal obligation. To quote the framework:

It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

This has clearly not been met since all surrounding schools are full.

The plan is not sound because the assessment of the site by SSDC's consultants Lepus rated the site a major positive when considering education. The first point to note is that SSDC are assuming that they can rely on the educational provision of Stafford Borough Council, with the proposed site's placement being right on the southern



boundary of SBC at Wildwood (and the absence of alternative provision local to the site). There are significant new and planned housing developments in the south of Stafford – indeed, they have provided significantly more housing than their minimum requirements. This has provided significant housing availability (negating the need for the 306c site) and has also put even more excessive demands on local schools and healthcare. Whilst the local schools are excellent – they are already at full capacity and indeed oversubscribed, clearly making this assessment inaccurate. Stafford Borough Council would without hesitation confirm this, and indeed that a collaborative approach has not been taken (again contradicting the quote from NPPF above). The removal of this major positive marking would ultimately reverse the consultant’s assessment, as they already identified 5 minor negative assessments, 1 major negative and only 2 minor positives for the site.

We dispute that the SSDC Plan needs to deliver the number of houses on it, as the number exceeds SSDC’s target by 473, meaning that this detrimental proposal is not only unquestionably not worth the sacrifice, but also completely unnecessary. However, if it is considered they do need to increase the number of houses on the plan, there are clearly far more appropriate sites (such as Codsall/Bilbrook, or even site further south in SSDC). Importantly, there are also 4.4 hectares available on the brownfield register. These locations would clearly be a more suitable alternative to site 036c.

The plan does not comply with the duty to cooperate because it’s not a positive planning process. SSBC did not advise of this form, we only heard about it through neighbours. We struggle to see where the communication of this plan has taken place, nor indeed how any meaningful consultation has taken place.

Furthermore, this plan clearly ignored public opinion and their own past councillor’s decisions, as this site has already been proposed, and of course was withdrawn because it is simply not suitable.

As noted in another representation, but relevant to the above, SSDC do not demonstrate that they have exercised their Duty to Cooperate with Stafford Borough Council in that they have not acknowledged or taken account of the housing allocation that SBC have declared in their plan for Stafford Borough 2011-2031. They have also not taken account of the already evident pressure on their education and healthcare provision, or the impact on the roads.

Site 036c is clearly unnecessary and surplus to reasonable requirements. I ask the Inspector to consider this matter.



(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.

Complete removal of the proposal of site ref 036c.

(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:

***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