

Our ref: DW.ET

Your ref:

Date: 23 May 2014

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Dear Mr Roberts

The Plan for Stafford Borough

I am sure that the Inspector is well aware of the recent Gallagher case handed down in the High Court. It reinforces in my view, that the points we have previously made to the Inspector regarding the calculation of objectively assessed needs. The evidence before him would not, in our view, reasonably meet the tests (which is reinforced in the Gallagher case following Hunston.)

Not only does the evidential base not support the assessment but the housing trajectory is also predicated upon back loading the housing numbers. Quite plainly, this does not address the objective need but seeks to meet that need by reference to the potential supply. A plan based on such a trajectory, again would not be lawfully sound.

We consider that the EIP should be re-opened to consider not only the main modifications which have been put forward (as we have already suggested) but also to re-consider the objectively assessed needs.

Kind regards

Yours sincerely

David Walton

cc: Sarah Wozencroft
Rob Gill