

**APPEAL REF: APP/Y3425/W/23/3315258**

**Appeal by: Serco Ltd / plc**

**CHANGE OF USE FROM STUDENT ACCOMMODATION TO  
ASYLUM SEEKER ACCOMMODATION (22/35765/FUL)**

**Stafford Education and Enterprise Park, Weston Road,  
Stafford ST18 0BC**

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CLOSING SUBMISSIONS ON BEHALF OF  
STAFFORD BOROUGH COUNCIL

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## INTRODUCTION

1. In opening we noted the apparent tension between the immigration and asylum policy of the Home Office ("the HO") and planning policy. The HO is trying to "stop the boats" and part of the strategy is, apparently, to accommodate asylum seekers in relatively basic conditions and keep them economically inactive on subsistence incomes while their claims are determined. In an individual case this may take over 18 months. There has been no policy or guidance from DLUHC to inform the planning system as to how it should react to the HO strategy and in particular whether the policy to seek to deliver sustainable communities should be applied as we would to any other form of proposed 'specialist' residential accommodation. So far as the participants at this inquiry are concerned, this is the first appeal of this nature<sup>1</sup>.
2. The numbers of asylum seekers requiring accommodation has grown exponentially in recent years. The HO has commissioned the Appellant, Serco, amongst others to find and run the accommodation needed. The potential sources comprise houses and flats rented from private landlords, together with hotels and converted institutional accommodation blocks. The use of hotels in particular has caused public concern. The HO is concerned

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<sup>1</sup> Dysch in XX. She also confirmed that Serco had not secured planning permission from a LPA in an analogous scheme.

about the cost and value for money for the tax-payer. Far-right groups also regard asylum-seekers being accommodated in hotels while they feel 'left-behind' as unacceptable, and serious public order incidents have resulted.

3. Accommodating asylum-seekers, particularly single young men, in hotels with few on-site facilities and with a limited income to engage off-site means that these men with little to do have understandably taken to 'hanging around' in groups in public. As shown by local people who have spoken in this case, this has the potential to cause concern for some of the local population, potentially leading to undesirable consequences. This is particularly acute where the accommodation contains a large number of residents and is located in an urban area without much on-site amenity space.
4. The HO now seems to recognise that a change of tack is needed. Recently it has announced new proposals to house large number of asylum-seekers in former MOD sites and the like<sup>2</sup>. There the approach is one of "self sufficiency", with more facilities and amenities provided on-site to "minimise the impact on local communities and services".<sup>3</sup> The use of hotels in urban areas in particular is to be wound down.
5. Against that background, the identification of the appeal site with its limited amenity space and lack of facilities as a candidate for a 481-person asylum-seeker accommodation seems something of an anachronism<sup>4</sup>. It is part of a concept that has had its day. For reasons which will be explored further below, it is not an appropriate component of a sustainable community in this part of the town of Stafford.

#### THE PROPERTY AND ITS RESIDENTS' ROUTINE

6. There will be up to 481 bedspaces for a maximum of 481 people [PD&AS, CD A2, §3]:
  - a. Up to 171 will be used for Initial Accommodation ("IA") for use by

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<sup>2</sup> CDJ3-6.

<sup>3</sup> See e.g. CDJ3 under the heading "What is Bexhill"

<sup>4</sup> The site was identified as Serco's preferred option in 2020 – see ¶3.23-27 of the D&AS (CDA2). The first contact with the Council was in October 2020 (Jackson proof ¶2.2). By then the site had been selected (Wood in XX).

single adults and/or families. Families would occupy a whole cluster of 4 or 5 bedrooms.<sup>5</sup>

- b. 310 for Dispersed Accommodation ("DA") for use by single adults only in clusters of 4 or 5 bedrooms.
- c. As well as bedrooms, each cluster has a communal kitchen, dining and lounge space. There would be no TV or broadband provided in a cluster.<sup>6</sup>
- d. Cluster kitchens will be fitted with washing machines. There will be no use of the former student communal laundry.
- e. Which clusters are used for IA and which for DA will be a matter for Serco's operational judgment?
- f. The number of single males, single females and families will vary over time. There is no proposed control by the planning system, for example, over the number of single males resident at any one time. This too will be left to the judgment of Serco and the HO<sup>7</sup>.

7. Bedrooms and internal living space will meet required HMO standards. Serco has no intention to change that and should not do so.<sup>8</sup>

8. While the PD&AS stated (¶13.7) what internal space the IA facility would provide for residents and internal layout plans were produced for each floor (CD A12-A14), the Appellant has now indicated it wishes to retain flexibility over the final internal layout and so a condition is proposed to be imposed governing the size of rooms. The outdoor recreational area is effectively the internal courtyard. Its use will be the subject of the management plan to be approved under a condition – the Council considers its layout should be too.

9. The life / routine of an asylum seeker living on the appeal site was confirmed by Ms Dysch:

- a. A person would be allocated a bedroom in a single-sex or family

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<sup>5</sup> Although the split of IA and DA could vary over time; it will not be controlled by the planning system.

<sup>6</sup> Dysch in XX

<sup>7</sup> Dysch in XX

<sup>8</sup> Dysch in XX

- cluster.
- b. They would do their own cooking, cleaning and laundry.
  - c. All food and supplies have to be purchased from the £45 pw allowance each receives (“a very limited income” according to the D&AS (CDA2) at ¶6.6).
  - d. If they were provided with meals centrally, the allowance would be £9.10 pw. This is an indication of the amount available for all non-food expenditure.
  - e. Residents do not drive. Motorised travel is largely by public transport which must be paid for<sup>9</sup>. The shuttle service promised in the consultation leaflet (Beatty Appx 1) will not, after all, operate. Those with mobility issues may be provided with discretionary free transportation, and some general transport would be offered to legal, HO and medical appointments.
  - f. Food will be purchased locally. There is a small Co-op store at Unit 1, Brereton Way is about a 14 min walk away. The town centre Asda store is about 2.25 km away, a 35 min walk.
  - g. No mobile phone equipment or wifi is provided. Individuals are responsible for paying any costs / bills<sup>10</sup>.
  - h. Asylum seekers are not allowed to work to earn money.
  - i. Residents will have very little if any disposable income for travel, recreation – gym, sport, meals out, cinema, pubs – or holidays. Recreational activity will effectively be limited to that which is free and/or provided on site.<sup>11</sup> The application regarded the site as being in a sustainable location in part as a result of the services and facilities nearby (CD A15, Table 1). However, it is most unlikely that residents will be able to afford to patronize most of them.
  - j. Although the original floorplans did not provide for shared internal amenity space, Ms Dysch suggested that a TV may be provided in a communal common room.<sup>12</sup>
  - k. Despite an expressed intention to facilitate (Dysch ¶7.10) Serco will

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<sup>9</sup> Dysch in XX

<sup>10</sup> Dysch in XX

<sup>11</sup> Agreed by Dysch in XX

<sup>12</sup> Dysch in XX

not commit at this stage to providing anything in particular by way of recreational facilities or activities. The expectation is to make provision as on other sites largely through the voluntary sector (Jackson Rebuttal ¶2.12). No analogous volunteer groups have been approached in Stafford. This would only happen if planning permission was granted. The detail is to be left to the management plan to be agreed under a condition.

10. While not allowed to take up employment, residents are permitted to 'volunteer' (Dysch 7.11). There is no indication as yet as to how many will be able or wish to do so, nor who in Stafford will organize it. This again is a matter to be left to the management plan.
11. Residents would be permitted to form a team to join a local football league (Dysch 7.11). While Serco has apparently sponsored teams in the past (providing kit) there is no commitment to doing so here, and it is unclear where practice would take place and how other expenses would be met.
12. When residents need a break from the 4 walls of the cluster or the confines of the on-site courtyard, they will head off-site and 'hang around'. There is nothing else to do. That is what happens elsewhere.
13. Mr Jackson opines in his rebuttal proof at ¶2.15 that the accommodation at the appeal site would be better than at hotels on the basis of there being more space for a wider range of activities. However, he accepted<sup>13</sup> that some hotels run by Serco have more extensive grounds and some have leisure facilities included. In any event, it is submitted that even if the Stafford Court facility at the appeal site offers more than at some or even many hotels, that does not mean that the offer is adequate in planning terms. Hotel conversions not requiring planning permission will not have had rigorous independent assessment against national planning policy.

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<sup>13</sup> Jackson in XX with regard to the Ramada, Sutton Coldfield – see the table at rebuttal ¶2.18.

14. While the Council is not promoting any other particular alternative site, the reasons why the appeal site were selected are instructive:

- a. The configuration of self-contained clusters are ideal and flexible<sup>14</sup>.
- b. it was regarded by Serco as the “most suitable” for its needs under the AASC for the Midland and East of England<sup>15</sup>.

15. The D&AS at ¶3.22++ explains the site selection process:

- a. The process began in January 2020 with contact being made with agents and groups in the property sector. Only eight candidate sites were identified. All were owned by the private sector.
- b. All but the appeal site were discounted.
- c. Some were said to be too expensive or not commercially viable. No indication of the parameters applied were given.
- d. Others were said to be likely to take too long to be delivered. There is some irony in that given the Stafford Court site is still not delivered 3 years later.
- e. Stafford Court was the only site on the list where the Borough was not contributing asylum seeker accommodation under the AASC scheme.

16. The first contact with the Council was in October 2020<sup>16</sup>. By then the site had been selected<sup>17</sup>. Nevertheless, pre-application consultation was carried out in February and March 2022 [CD A4] with an “opportunity” for “feedback”. No changes to the proposal at all followed. It was simply an exercise to gather comments that Serco could then try to respond to in the material supporting the planning application – local people do not feel it has even done that.<sup>18</sup>

17. The PD&AS ¶3.16 explains that the HO asks all local authorities to facilitate DA for asylum seekers. The HO has determined that what is “fair” is a ratio of 1:200 of the population. On that basis the HO’s position is that Stafford BC “must” facilitate 684 places for DA. The population of England is

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<sup>14</sup> CDA2 D&AS ¶3.28.

<sup>15</sup> CDA2 D&AS ¶3.27.

<sup>16</sup> Jackson proof ¶2.2.

<sup>17</sup> Wood in XX.

<sup>18</sup> CDA4, ¶5.1.1., Wood in XX

estimated to be 56.5m. 1:200 indicates 282,700 DA places should be provided nationally which is almost double the current requirement.

18. There is no evidence that anyone approached Stafford BC asking for local views on where / how a 'requirement' for 684 places of DA might best be met in the Borough. Instead, the approach has been unashamedly 'top-down'.

19. The newest public sector sites being selected are far different. The 'Factsheets'<sup>19</sup> show:

- a. Sites are to be "as self-sufficient as possible" to "minimize the impact on local communities and services".
- b. This means that on-site catering, recreational and cultural activities, shops, faith and worship space, medical facilities will all be provided to meet essential needs of residents and to allow them to occupy their time constructively.
- c. Those running the sites are to work closely with local stakeholders.
- d. There will be 24/7 security.

20. Paragraph 92 and 130f of the NPPF require planning decisions to aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

21. Paragraph 130 requires planning decisions to ensure development will function well; create places that are inclusive and accessible; promote health and well-being; provide a high standard of amenity for existing and future users.

22. For the reasons we explain below, this is not going to be achieved at Stafford Court on the basis of the appeal proposals.

## FEAR OF CRIME

23. Public concern, as opposed to actual evidence of threats to public safety, can

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<sup>19</sup> CDJ3-6

be a material consideration in planning decisions. In *Newport BC v SS for Wales* [1998] Env LR 174<sup>20</sup> the Court of Appeal overturned an award of costs that had been made against the local planning authority by the Secretary of State at appeal on the basis that the authority had acted unreasonably in taking into account the public perception of danger emanating from a chemical waste treatment plant which was unsupported by evidence. The court held that it was a material error of law to conclude that a genuinely held public perception of danger which was unfounded could never amount to a valid ground for refusal.

24. The issue of the relevance of public concern to planning also arose in *West Midlands Probation Committee v SSETR* (1998) 76 P&CR 589<sup>21</sup>. This case concerned an appeal by the West Midlands Probation Committee against the refusal of planning permission for an extension to a bail and probation hostel, the inspector having found that the extension would be likely to increase significantly the disturbance caused to nearby residents. The Court of Appeal dismissed the appeal. The concerns held by residents were justified because of a history of disturbing behaviour.

25. The case of *R v Broadland DC ex p Dove* [1998] PLCR 119<sup>22</sup> establishes that behaviour associated with the use of land for a particular purpose relates to the character of the use of the land and is capable of being a material planning consideration. It was also held that public fears or concerns can be a material considerations if they have land-use consequences – in that case fear of crime resulting in reduced pedestrian journeys and additional car trips to and from school.

26. In this case it is relevant to ask:

- a. What evidence is there that conduct by residents of asylum seeker accommodation will or is likely to increase crime in the area or be a cause of public concern?
- b. What evidence is there that the presence of asylum seeker

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<sup>20</sup> CDG1

<sup>21</sup> CDG2

<sup>22</sup> CDG3



- accommodation will increase crime in the area by non-residents?
- c. What evidence is there that local residents fear such a rise in crime?
  - d. If there is no evidence to objectively justify such fear, is the fear nevertheless genuinely held?

27. It is fair to observe that the local residents' principal concerns are for the conduct of groups of single young men facing desperation, boredom or frustration which will not be mitigated by the circumstances in which they will be kept at the appeal site.

28. There is also a fear of crime by two categories of non-residents:

- a. The 'far-right' whose protests either cause or are taken advantage of and result in public disorder and damage to property.
- b. The 'criminal gangs' who will seek to prey on the residents luring them into using or supplying drugs, or into modern slavery.

29. The consultation response of the police's designing-out crime officer [CD B8] is evidence of similar fears:

- a. The safeguarding of the occupants is of the "utmost priority". There is a prospect of "community tension". That is why the site to be made secure. The message is that the general public must be kept out.
- b. The security recommendations (in reality requirements) are also illuminating: restrictions to keep the public out; communal entrance doors to be of a particular standard to prevent them being forced open.
- c. Emergency plans are required for:
  - i. External encroachment by those with "malicious intent".
  - ii. "Occasions where occupants may act inappropriately". Presumably out of boredom or protest at their conditions. CCTV is said to be "especially useful" for "issues amongst the occupants."
- d. Fears for the personal safety of occupants. Because they are unable to work, there is a risk of exploitation – labour, criminal, sexual.

- e. In that context the suggestion that there is no evidence to suggest an increase in crime is not credible.

30. Serco has carried out a risk assessment that has reached similar conclusions.<sup>23</sup>

31. There is ample evidence that the fear of crime exists:

- a. The police consultation response accepts that it exists [CD B8].
- b. It is contained in the more than 1,000 written responses to the planning application and appeal.
- c. Communications with Cllr Beatty (see her proof ¶8).
- d. The activity of 'far-right' groups in planning committee and at other locations in the country.
- e. In the local MP's letter to PINS of 27.1.23 [CDJ1]: "You may be aware that we currently have approx. 70 young men accommodated in the village of Penkrige in my constituency. I already have numerous complaints about men hanging around the local schools and following girls home. The harassment of women whilst going about their daily business and various other problems. This illustrates perfectly why the Beaconside site is so inappropriate, and I fear serious implications if it goes ahead."
- f. In the evidence given to this inquiry.

32. In addition to the hundreds of written responses to the planning application and the appeal, about 30 local people told the inquiry orally about their concerns, with many stating that the proposed development would alter their behaviour and their children's behaviour.

33. The most common concern raised was over the safety of unaccompanied children walking to school in close proximity to large numbers of bored young men from unknown backgrounds with very little money, activities, space, or places to go. Residents' concerns were exacerbated by the recognition that

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<sup>23</sup> Dysch ¶7.13-14.

some asylum seekers may be dealing with serious mental health issues, including trauma. Mrs Shelly told the Inquiry that were the development to go ahead, she would be worried about her two vulnerable autistic children walking to school. Mr D. Harland agreed that some parents would feel that their children are unsafe walking and would in future drive to and from school. Mr Connolly said he would no longer feel comfortable with his 12-year-old daughter walking to school with her friends. Mr Calladine expressed his fears for the safety of his two young daughters that attend the Weston Road Academy walking to and from school. Another speaker, Ms E. Dugmore, raised concerns for her own safety as a single woman walking or cycling at night. She explained her fear of coming across a group of unknown men with whom she could not communicate. In her words, *"the fear of crime is sometimes even worse than actual crime. I don't know if I will be attacked or assaulted. That is a horrible way to live life. Why should I have to change my behaviour ...?"*.

34. Some local people also fear that residents of the centre would be tempted to crime through desperation and poverty. They pointed out that asylum seekers must survive on an allowance of just £45 per week for food, clothes, toiletries, a phone, travel and activities. Mrs K. Dugmore, who lives in what she described as a fairly rural and isolated location by a popular footpath, was concerned that residents may be tempted into petty theft of food from her garden. Similarly, Mr Wilson told the Inquiry of his worry that asylum seekers' need for food could result in street robberies or stealing food from shops.

35. Thirdly, local people expressed concerns about the risk of increased crime from non-residents through public disorder, violent protest, and attacks on the asylum seekers themselves. Mr Cawley fears Stafford Court might become a target for far-right extremist groups. Ms Trowbridge, a former Borough Councillor, noted the events in the town centre in Cannock and that Serco had not prevented such issues occurring. She also queried why it was necessary for security measures around Stafford Court (and why indeed there is currently a fence erected). She noted some asylum seekers may be vulnerable, including those with mental health issues, and that they may not

be safe from being attacked. Ms Ailcock on behalf of Stafford Welcomes Refugees expressed concern that young asylum seekers wandering around with nothing to do “*will be sitting ducks for far-right activists*” in the region.

36. In its “Opening Points” it was submitted<sup>24</sup> by Serco that there were three gateways which must be passed before the fear of crime can be taken into account.

- a. The fear must be objectively justified. The Council submits it has been sufficiently, even though that is not a clear and consistent requirement in the case law<sup>25</sup>. It is based on experience elsewhere where some of the problems feared have been manifest, including far-right protests and counter-protests in nearby Cannock.
- b. It must have some reasonable basis. It has; it is based on matters identified by Serco and the police, by the local MP, and in media reports.
- c. It must relate to the use of the land. It does; it is the conditions under which the residents are proposed to be kept, and the site’s location particularly in relation to schools, that underpins local concerns.

37. This appeal has demonstrated the importance of selecting the right site – in planning terms. The site search focused on Serco’s operational requirements. Only once the decision was made did Serco think of engaging with the local community and legitimate planning considerations.

## SOCIAL INCLUSION

38. As the Serco Opening Points recognises, there is some over-lap with the ‘fear of crime’ issue. The aim, as ¶92 and 130 of the NPPF recognise, is to integrate, so far as is possible, the residents into the local community. There are a number of real obstacles to achieving the result that Serco desires<sup>26</sup>:

- a. The sheer number of residents – up to 481 of them.

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<sup>24</sup> ¶17

<sup>25</sup> See CDG3, page 128 at letter C.

<sup>26</sup> Serco Opening Points ¶17.

- b. It relies on the support of local people, charities and community groups. As the Inquiry heard, a notable group of local people are already pre-disposed to fear in particular the single men, but some support for families has been expressed. The inquiry heard from Miss Ailcock of Stafford Welcomes Refugees who expressed grave concern at the prospect of another 481 refugees in the town. She said they were already “stretched” helping the 77 at Bridgewood House and described the appeal proposal as “a recipe for disaster”.
- c. Serco has not proposed any organized and funded support as any ‘normal’ appellant would when faced with a planning impact that required mitigation. It does the HO’s bidding which seems to be to provide very little.

39. Cllr Beatty expressed a preference for ‘pepper-potting’ refugees throughout the town based on respected research and reports<sup>27</sup>. Serco doubts that this will be possible for 481 people. If that is the case, the Cllr Beatty’s preference was for the new ‘self-sufficient’ larger institutions where everything is provided on site which the government now also sees the advantage of “to minimise the impact on local communities and services”.

40. The appeal scheme, effectively a large facility without self-sufficiency, is the worst of all worlds.

#### LOCAL HEALTH SERVICE RESOURCES

41. The Council’s decision notice [CD A25] averred that “the application fails to demonstrate the proposal would not lead to a detrimental impact on local health service resources.”

42. The members were told in the supplementary officer report<sup>28</sup> that the County Council had stated that “Asylum seekers in the DA will increase demand on local services, asylum seekers are likely to have more challenging health needs than students. The local health providers should confirm what impacts need to be mitigated.”

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<sup>27</sup> See Beatty ¶19 and CDG5 & G9

<sup>28</sup> CDA23

43. In respect of health services, the D&AS<sup>29</sup> stated the following:

- a. IA residents (which includes families):
  - i. Will be registered with an on-site provider; local services will only be needed in an emergency (¶3.48).
  - ii. Will receive on-site health care (¶6.3). Or it might be off-site (Wood 7.6).
  - iii. Funding flows down from Department of Health (Wood ¶7.1)
  - iv. There will be referral pathways from GPs to other medical services (Wood ¶7.4, 7.5). These will be local services.
  - v. A high rate of access is likely to be required (Wood ¶7.10)
- b. DA residents (single persons only – male and female):
  - i. They will receive a health assessment at the start of their stay (¶3.12).
  - ii. Provision will be met off-site in local facilities (¶7.5; Wood 7.7).
  - iii. Although Serco is working with the HO to see if it can be brought on-site (¶3.48). This can already happen as it does in Coventry (Wood ¶7.9). In this event health service would be commissioned from a local GP practice.
- c. On-site facilities will be provided in the form of a medical room under the contract with the HO.

44. It is therefore plain that local GP and other local medical services will be called on:

- a. Human resources (doctors and nurses) will be required on and off site. These will be the very same staff at existing local services. The appellant has not shown that staff for the new residents will not be simply diverted from treating the existing population.
- b. Rooms in off-site facilities will be needed. The CCG first consultation response<sup>30</sup> indicated that the local practice “currently has a shortage of gross internal area (GIA) and clinical rooms to serve the existing

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<sup>29</sup> CDA2

<sup>30</sup> CDB1

population.”

- c. Subsequent consultation responses<sup>31</sup> expressed satisfaction with the on-site medical room, but Serco has not responded at all to the shortage of space and resources that DA residents will call on. Nor has it been demonstrated that additional staff will be recruited.

45. Serco continues to rely on the proposition that the impact on health services will not be as great as when the students were in residence<sup>32</sup>. This is wholly misguided:

- a. There is no prospect of the student use resuming – the current impact is almost ‘nil’.
- b. Students in any significant number were last in residence 5+ years ago. Since then new housing development (c620 dwellings) close to the appeal site has taken up any spare capacity created by the students’ departure – indeed, the number of new houses exceeds the number of student accommodation bed spaces, and as most of the new housing is family houses the number of new residents would be 3+x the number of students.<sup>33</sup>
- c. The need for medical attention is greater in the asylum-seeker population.
- d. Mental health issues are likely to be greater amongst the asylum-seeker population (Wood ¶7.13)

46. The above premise is plainly “misguided” as the ICB has made clear<sup>34</sup>.

## CONDITIONS

47. A number of points remain between the parties with respect to the conditions necessary.

- a. In regard to Condition 6, the Appellant does not accept the

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<sup>31</sup> CDB2 & B3

<sup>32</sup> PD&AS ¶6.4, 7.5; Wood 7.11; Jackson email 10/6/22 in Wedderburn Appx 10, Jackson proof 4.32 & 4.33, 5.8.

<sup>33</sup> Cllr Beatty in XIC referred to 620 houses having been built adjacent to the site and south of Tixall Road since the students left

<sup>34</sup> See email from Philip Murphy on 4/7/22 in Wedderburn appx 10.

requirement to submit for approval the layout of the courtyard. However, this is the only outdoor amenity space for some 481 people, and if children in particular are to benefit from its use, the Council considers a scheme of physical improvements to be necessary.

- b. With regards to condition 9:
  - i. the schedule of activities should be as comprehensive as it can be at the outset; and
  - ii. the Appellant should be required to comply with the updated management plan.
- c. With regards to condition 10, the Appellant's wording means that they could count small individual parcels of space to amount to 90sq m. This is not acceptable to the Council given the discussions about the need for an internal space for teaching, talks, and activities.

## PLANNING BALANCE

48. The appeal scheme accords with the development plan. However, as material considerations, the Council relies on the matters discussed above – local concern and the fear of crime, the lack of social inclusion and the lack of a clear demonstration that there will be no impact on local health services – as outweighing the presumption in favour of a permission.

49. The appeal scheme is too big, it is located too close to schools, and the site lacks in particular suitable and sufficient outdoor recreation space that is obviously required. All these points and more were put to Serco in the public consultation. But by then it was too late to influence the decision to abandon the scheme. Serco had found premises it regarded as ideal in terms of meeting the requirements of the HO contract. It is just a shame closer attention was not given as to whether or not it was a good site in planning terms.

50. If the HO wants Stafford Borough Council to host up to 684 DA places, then it would do well to engage with the Council as an equal partner to establish how and where that can best be achieved.



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