	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<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\*

*\*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)

<p>Title <input style="width: 90%;" type="text"/></p> <p>First Name <input style="width: 90%;" type="text"/></p> <p>Last Name <input style="width: 90%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 90%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 90%;" type="text" value="Seddon Homes"/></p> <p>Address Line 1 <input style="width: 90%;" type="text" value="C/O Agent"/></p> <p>Line 2 <input style="width: 90%;" type="text"/></p> <p>Line 3 <input style="width: 90%;" type="text"/></p> <p>Line 4 <input style="width: 90%;" type="text"/></p> <p>Post Code <input style="width: 90%;" type="text"/></p> <p>Telephone Number <input style="width: 90%;" type="text"/></p> <p>E-mail Address (where relevant) <input style="width: 90%;" type="text"/></p>	<p><input style="width: 90%;" type="text" value="Mrs"/></p> <p><input style="width: 90%;" type="text" value="Amy"/></p> <p><input style="width: 90%;" type="text" value="James"/></p> <p><input style="width: 90%;" type="text" value="Associate Director"/></p> <p><input style="width: 90%;" type="text" value="WSP UK Ltd"/></p> <p><input style="width: 90%;" type="text" value="8 First Street"/></p> <p><input style="width: 90%;" type="text" value="Manchester"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="M15 4RP"/></p> <p><input style="width: 90%;" type="text" value="0161 200 500"/></p> <p><input style="width: 90%;" type="text" value="Amy.james@wsp.com"/></p>
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## Part B – Please use a separate sheet for each representation

Name or Organisation:

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 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.

Previous representations, submitted by WSP on behalf of Seddon Homes, to the Local Plan Publication Stage in 2022, raised concerns about the lack of cross-boundary working and the failure to account for cross-boundary sites.

As set out previously, WSP is acting on behalf of Seddon Homes promoting a site to the south of Stafford Town, known as land at Ash Flats, for residential development. The majority of the site lies within the administrative boundary of Stafford, however, a small proportion of the south part of the site is located in South Staffordshire. Points were raised in the previous representations about how the lack of cross-boundary working results in the Plan being unsound as it has not been positively prepared or based on an effective strategy.

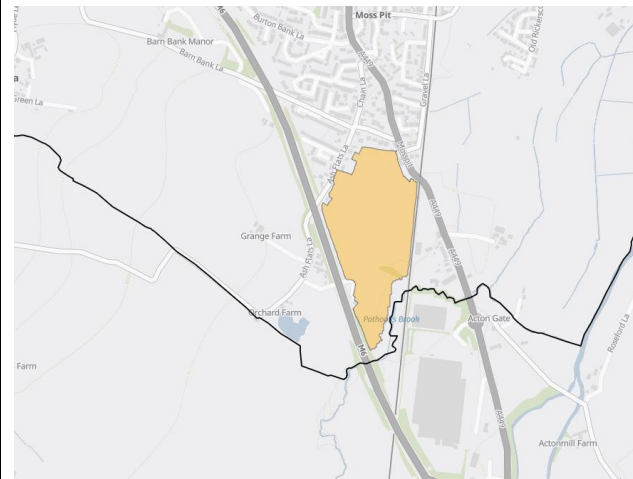
Recommendations were made in the previous representations that the southern part of the Ash Flats site should be identified as a cross-boundary housing allocation. Having reviewed the latest Publication Version Local Plan Maps it appears that the southern part of the Ash Flats site remains unallocated. Therefore, concerns remain that this latest Publication Version of the Plan continues to be unsound.

Sites do not always follow Borough boundaries and the delivery and quality of a scheme should not be constrained due to having to be confined to a single Borough.

The Ash Flats site is edged red on the aerial image below:



Stafford are also in the process of conducting a Local Plan Review and have consulted on the Preferred Options Plan. Within the Preferred Options Plan, Land at Ash Flats is identified as a draft housing allocation and given reference STAFMB03. As Local Planning Authorities (LPAs) cannot allocate land beyond its own boundary, the draft allocation only extends as far as the Stafford Borough boundary, however, the extent of the site being promoted extends further southwards into South Staffordshire.



(Extract from the Plan for Stafford Borough 2020 – 2040 Preferred Options Proposals Map)

Representations were submitted by WSP, on behalf of Seddon Homes, to the Plan for Stafford Borough 2020 – 2040 Preferred Options Consultation (December 2022). Amongst the points raised were the fact that the extent of the draft allocation should extend right up to the borough boundary and include the flood zone area. The representations acknowledged that whilst it is appreciated that it is unlikely residential development would occur in this location, this area does provide an opportunity for landscaping and ecological enhancements, therefore, should be included in the site boundary of the allocation. This would take the allocation right up to the borough boundary so that it can be continued into South Staffordshire to ensure it covers the entire Ash Flats site area.



The latest Strategic Housing and Economic Land Availability Assessment (SHELLA) did identify the site as 'land adjacent to M6 off Ash Flats Lane' (SHELLA ref: 034) but it was discounted as a future housing site on the basis that it was disassociated from any village development boundary. However, it wasn't considered in the context of it being part of a larger cross-boundary site and assuming the wider draft housing allocation for the site was formally adopted in a new Stafford Local Plan, this would change the nature of this area and the southern part of the site would no longer be isolated from other development.

The Ash Flats site forms a logical extension to Stafford Town with defensible boundaries (M6 Motorway, the Stafford to Birmingham Railway and the A449 main road). Given these strong physical boundaries, it means the development of the Ash Flats site would not result in urban sprawl across the open countryside. These physical boundaries extend into South Staffordshire, therefore, containing the development of the site.

Although site 034 is largely within Flood Zone 3, this does not prevent it from being suitable to accommodate non-housing elements of a wider scheme being delivered at the Ash Flats sites such as ecological and landscape enhancements.

The red line boundary of the future application will encompass the entire site as shown on the Google Earth extract above. Therefore, having part of the site allocated for housing (assuming it is formally allocated in the new Stafford Local Plan) and the remainder in the open countryside would be at odds with one another. Allocating the entire site represents good planning and will enable the Ash Flats site to come forward comprehensively and incorporate ecological and landscaping enhancements as a key feature of the scheme.

On that basis, the full extent of the Ash Flats site should be allocated for housing.

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.

To make the Plan sound and meet the requirements of being positively prepared and effective, there needs to be an acknowledgement of cross-boundary sites, which is currently missing from the Publication Plan. Including the remainder of the Ash Flats site (SHELLAA site 034) as a housing allocation would represent effective joint working. It would also mean the plan has been positively prepared as it will assist Stafford in being able to meet its housing needs by being able to maximise delivery of housing on the northern and central areas of the Ash Flats site and utilising the southern part (within South Staffordshire) to provide opportunities for ecological and landscape enhancements.

Therefore, a main modification is required to Policy Inset Map 11 to include 'Land adjacent to M6 off Ash Flats Lane' (site reference 034) as a cross-boundary housing allocation.

**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:

WSP wish to participate in the Hearing Sessions on behalf of Seddon Homes as it is important in ensuring the Plan is sound that cross-boundary sites, such as Ash Flats, are acknowledged and in the case of Ash Flats allocated for housing to enable the site to come forward in a comprehensive and consistent manner.

***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**

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

Name or Organisation:

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 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.

Previous representations to the Local Plan Publication Stage in 2022, submitted by WSP on behalf of Seddon Homes, raised concerns about the lack of cross-boundary working and the failure to account for cross-boundary sites.

As set out previously, WSP is acting on behalf of Seddon Homes promoting a site to the south of Stafford Town, known as land at Ash Flats, for residential development. The majority of the site lies within the administrative boundary of Stafford, however, a small proportion of the south part of the site is located in South Staffordshire. Points were raised in the previous representations about how the lack of cross-boundary working results in the Plan being unsound as it has not been positively prepared or based on an effective strategy.

Recommendations were made in the previous representations that the southern part of the Ash Flats site should be identified as a cross-boundary housing allocation. Having reviewed the housing allocation policy in the latest Publication Version (policy SA3) it appears that the southern part of the Ash Flats site remains unallocated. Therefore, concerns remain that this latest Publication Version of the Plan continues to be unsound.

Sites do not always follow Borough boundaries and the delivery and quality of a scheme should not be constrained due to having to be confined to a single Borough.

Stafford are also in the process of conducting a Local Plan review and have consulted on the Preferred Options Plan. Within the Preferred Options Plan, Land at Ash Flats is identified as a draft housing allocation and given reference STAFMB03. As Local Planning Authorities (LPAs) cannot allocate land beyond its own boundary, the draft allocation only extends as far as the Stafford Borough boundary, however, the extent of the site being promoted extends further southwards into South Staffordshire.



The intention is not necessarily to seek residential development on this southern part of the site requiring South Staffordshire to apportion some of its housing numbers to this site, but more that there is a joined-up approach that enables the full extent of the Ash Flats site to come forward. It is acknowledged that the southern part of the Ash Flat site is within the Flood Zone, therefore, whilst unlikely to come forward for housing, this doesn't preclude it from being suitable to accommodate non-housing elements of a wider scheme being delivered at Ash Flats such as ecological and landscape enhancements.

The Ash Flats site forms a logical extension to Stafford Town with defensible boundaries (M6 Motorway, the Stafford to Birmingham Railway and the A449 main road). Given these strong physical boundaries, it means the development of the Ash Flats site would not result in urban sprawl across the open countryside. These physical boundaries extend into South Staffordshire, therefore, containing the development of the site.

The latest Strategic Housing and Economic Land Availability Assessment (SHELLA) did identify the site as 'land adjacent to M6 off Ash Flats Lane' (SHELLA ref: 034) but was discounted as a future housing site on the basis that it was disassociated from any village development boundary. However, it wasn't considered in the context of it being part of a larger cross-boundary site and assuming the wider draft housing allocation for the site was formally adopted in a new Stafford Local Plan, this would change the nature of this area and the southern part of the site would no longer be isolated from other development.

The red line boundary of the future application will encompass the entire site as shown on the Google Earth extract above. Therefore, having part of the site allocated for housing (assuming it is formally allocated in the new Stafford Local Plan) and the remainder in the open countryside would be at odds with one another. Allocating the entire site represents good planning and will enable the Ash Flats site to come forward comprehensively and incorporate ecological and landscaping enhancements as a key feature of the scheme.

On that basis, the full extent of the Ash Flats site should be allocated for housing.

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.

To make the Plan sound and meet the requirements of being positively prepared and effective, there needs to be an acknowledgement of cross-boundary sites, which is currently missing from the Publication Plan. Including the remainder of the Ash Flats site (SHELLA site 034) as a housing allocation would represent effective joint working. It would also mean the plan has been positively prepared as it will assist Stafford in being able to meet its housing needs by being able to maximise delivery of housing on the northern and central areas of the Ash Flats site and utilising the southern part (within South Staffordshire) to provide opportunities for ecological and landscape enhancements.

Therefore, a main modification is required to Policy SA3 to include 'Land adjacent to M6 off Ash Flats Lane' (site reference 034) as a cross-boundary housing allocation.

**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.**



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**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

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WSP wish to participate in the Hearing Sessions on behalf of Seddon Homes as it is important in ensuring the Plan is sound that cross-boundary sites, such as Ash Flats, are acknowledged and in the case of Ash Flats allocated for housing to enable the site to come forward in a comprehensive and consistent manner.

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Please tick as appropriate

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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.

Previous representations to the Local Plan Publication Stage in 2022, submitted by WSP on behalf of Seddon Homes, raised concerns about the lack of cross-boundary working and the failure to account for cross-boundary sites.

As set out previously, WSP is acting on behalf of Seddon Homes promoting a site to the south of Stafford Town, known as land at Ash Flats, for residential development. The majority of the site lies within the administrative boundary of Stafford, however, a small proportion of the south part of the site is located in South Staffordshire.

Whilst there is an acknowledgement in paragraphs 3.6 and 3.7 that the Council has been working collaboratively with neighbouring authorities on cross-boundary issues, it seems like this has been focused on meeting unmet needs from the Greater Birmingham Housing Market Area (GBHMA) or unmet employment needs. However, the GBHMA doesn't include Stafford and there is no reference to any cross-boundary working with Stafford with regards to the delivery of housing.

As set out in response to this latest consultation exercise, the suggestion isn't that South Staffordshire take on additional housing numbers as part of the Ash Flats site coming forward for development, just that there is a joined-up approach which enables housing to be maximised on the land within Stafford with the ability to then deliver open space, landscaping and ecological enhancements across the remainder of the site. Having the southern part of the site identified as a cross-boundary allocation, will provide a consistent approach.

Therefore, whilst the Duty to Cooperate might have been met in relation to addressing housing needs, in addition to this there needs to be an acceptance in the emerging Local



Plan that cross-boundary sites exist and these need to be identified and allocated appropriate to ensure consistency.

Sites do not always follow Borough boundaries and the delivery and quality of a scheme should not be constrained due to having to be confined to a single Borough.

Stafford are also in the process of conducting a Local Plan review and have consulted on the Preferred Options Plan. Within the Preferred Options Plan, Land at Ash Flats is identified as a draft housing allocation and given reference STAFMB03. As Local Planning Authorities (LPAs) cannot allocate land beyond its own boundary, the draft allocation only extends as far as the Stafford Borough boundary, however, the extent of the site being promoted extends further southwards into South Staffordshire.

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The Ash Flats site forms a logical extension to Stafford Town with defensible boundaries (M6 Motorway, the Stafford to Birmingham Railway and the A449 main road). Given these strong physical boundaries, it means the development of the Ash Flats site would not result in urban sprawl across the open countryside. These physical boundaries extend into South Staffordshire, therefore, containing the development of the site.

Although site 034 is largely within Flood Zone 3; however, this does not prevent it from being suitable to accommodate non-housing elements of a wider scheme being delivered at the Ash Flats sites such as ecological and landscape enhancements.

The red line boundary of the future application will encompass the entire site as shown on the Google Earth extract above. Therefore, having part of the site allocated for housing (assuming it is formally allocated in the new Stafford Local Plan) and the remainder in the open countryside would be at odds with one another. Allocating the entire site represents good planning and will enable the Ash Flats site to come forward comprehensively and incorporate ecological and landscaping enhancements as a key feature of the scheme.

Until all cross-boundary issues such as this have been considered and addressed, the Duty to Cooperate cannot be said to have been fully complied with.

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.

For the Duty to Cooperate to be met, there needs to be consideration and an acknowledgement of cross-boundary sites, such as Ash Flats, Stafford.



**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.**

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**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

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