


| | | |
|---|--|--|
|  | <p>Local Plan Publication Stage Representation Form</p> | <p>Ref:</p> <p>(For official use only)</p> |
|---|--|--|

Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

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 | <input type="text"/> | <input type="text"/> |
| First Name | <input type="text"/> | <input type="text" value="Andrea"/> |
| Last Name | <input type="text"/> | <input type="text" value="Caplan"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text" value="Associate"/> |
| Organisation (where relevant) | <input type="text" value="St Modwen Logistic & J Holts and Son"/> | <input type="text" value="Savills"/> |
| Address Line 1 | <input type="text" value="C/o Agent"/> | <input type="text" value="55 Colmore Row"/> |
| Line 2 | <input type="text"/> | <input type="text" value="Birmingham"/> |
| Line 3 | <input type="text"/> | <input type="text"/> |
| Line 4 | <input type="text"/> | <input type="text"/> |
| Post Code | <input type="text"/> | <input type="text" value="B3 2AA"/> |
| Telephone Number | <input type="text"/> | <input type="text" value="0121 615 2662"/> |
| E-mail Address (where relevant) | <input type="text"/> | <input type="text" value="andrea.caplan@savills.com"/> |



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 | Section 3 What Does the Local Plan Need to Consider | Policy | | Policies Map | |
|-----------|--|--------|--|--------------|--|

4. Do you consider the Local Plan is :

| | | | | |
|---|-----|--|----|---|
| (1) Legally compliant | Yes | | No | X |
| (2) Sound | Yes | | No | X |
| (3) Complies with the Duty to co-operate | Yes | | No | X |

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 **object** to the South Staffordshire Local Plan strategy on the basis that the proposed employment strategy is not justified or supported by appropriate evidence. The plan policies and related evidence base do not identify sufficient employment land to address the needs of South Staffordshire during the Local Plan period.

Section 1 below highlights the uncertainties with the current Duty to Cooperate position and lack of an agreed position within South Staffordshire’s Functional Economic Market Area. Sections 2 and 3 detail our concerns with the evidence base for the Local Plan and considers the Economic Development Needs Assessment, Landscape Appraisal and the Sustainability Appraisal.

1. Cross boundary Issues and the Duty to Cooperate (Paragraphs 3.6 – 3.7)

Reference is made to South Staffordshire’s legal duty to cooperate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries. In relation to the provision of employment land, cooperation between the local authorities which form the South Staffordshire Functional Economic Market Area (FEMA) is essential to ensuring an appropriate supply of land to address future needs.

The South Staffordshire Economic Development Needs Assessment (EDNA) identifies the South Staffordshire FEMA as including Cannock, Stafford, Walsall, Wolverhampton and Dudley.

However, as set out in the Industrial and Logistics Need Assessment (Savills December 2022 – Appendix A of these representations), Sandwell should also be included when assessing the needs of the FEMA and the Property Market Area (PMA) for South Staffordshire (paragraph 3.2.5). This is because Sandwell is located on the M5 / M6 corridor, as are the key employment locations in South Staffordshire. Moreover, SSDC’s Duty to Cooperate document refers to the requirement for the District to meet a portion of the Black Country’s unmet employment land need. The Black Country is comprised of Walsall, Wolverhampton, Dudley, and Sandwell.

In light of the termination of the joint Black Country Plan preparation, the SSDC Duty to Cooperate Topic Paper (2022) at paragraph 5.13 recognises that the Black Country authorities will need to reconsider their employment land provision needs. The Topic Paper notes that the Black Country authorities will be offering their views on whether South Staffordshire’s contribution to their unmet employment needs is supported through their responses to the SSDC’s Regulation 19 plan consultation. These views will the need to feed into the ‘South Staffordshire FEMA Statement of Common Ground’ (Appendix C of the Duty to Cooperate Topic Paper).

Discussions on the employment needs of the FEMA are clearly ongoing and will not be resolved in the short term. In light of this, it is considered that the SSDC Local Plan is currently progressing more quickly than the preparation of its essential supporting evidence base and as such the consultation on the Regulation 19 Publication Plan is premature. Flexibility is therefore needed in the employment land supply and associated Local Plan policies to address both the needs of SSDC and the wider FEMA, plus Sandwell.

2. Evidence Base (Paragraphs 3.8 – 3.9)

Economic Development Needs Assessment (EDNA)

The EDNA represents a key evidence base document for the new Local Plan and for informing the requirements of the wider FEMA. However, as identified in the Savills Industrial and Logistics Need Assessment (paragraph 5.6.2 – 5.7.5) there is a high variance in methodologies used by the local authorities in the FEMA, when preparing their EDNAs. Table 1 below summarises the methods used and the Savills report provides a commentary on the concerns raised in relation to this.

Table 1 - Summary of PMA Employment Evidence

| Study | Time Period Covered | Preferred Method(s) | Demand Adjustments / Flexibility | Total Future I&L Demand Estimates | Future I&L Demand Estimates p.a. |
|---|---------------------|--|--|-----------------------------------|----------------------------------|
| SSDC EDNA (2022) | 2020-2040 | Labour demand (+ adjustment for relationship with WMI) | 5 years’ worth of past completions | 65.7 ha | 3.3 ha |
| Black Country EDNA Update (2021) | 2020-2039 | GVA outputs, labour demand, past completions | 2-years’ worth of the labour demand-derived requirement | 502-522 ha | 26.4-27.5 ha |
| Stafford EHDNA (2020) | 2020-2040 | Labour demand, labour supply, past completions | 2-years of past completions | 51-135.8 ha | 2.6-6.8 ha |
| Cannock Chase EDNA Covid-19 Update (2020) | 2018-2038 | Labour demand, past completions | 2-years’ worth of past completions (medium-scenario), excluding Amazon’s G-Park development) | 50.4-64.8 ha | 2.5-3.2 ha |

Source: Savills (2022)

This variance in approach mainly stems from the EDNAs being statistical constructs that do not consider market conditions which influence demand. This is troubling given how much market information is available that can be used to contextualise future demand. Available sources include commercial databases such as CoStar and EGi, and agents data.

Rather, the methods used have limited regard to key growth drivers propelling the industrial and logistics sector to record levels of demand. While each of the EDNA studies note historic supply constraints, the impact this has had on 'suppressing demand' is not accurately dealt with other than applying arbitrary 'flexibility' margins.

Savills has developed a methodology which addresses these methodological flaws and accounts for suppressed demand, as detailed in Section 8 of the Industrial and Logistics Need Assessment.

In summary, Savills has developed a future demand methodology which addresses the fundamental flaws of the historic take up rate and labour demand methodologies used in the EDNAs of the South Staffordshire FEMA. The Savills methodology is compliant with the requirements of the Planning Practice Guidance ('PPG') as it:

- Analyses 'market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies'. If a market is identified as being supply constrained (i.e. demand exceeds supply) such as South Staffordshire, the Savills model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints; and
- Applies 'economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector.' The Savills method quantifies how much I&L floorspace growth is linked to current and future e-commerce growth which is the major growth driver for the sector driving both demand for the supply-chain, and also the manufacturing of goods. On the other hand, the historic trend approach used in the South Staffordshire FEMA EDNA's has little regard to how the sector has changed nor current day and future growth drivers impacting the sector.

The Savills methodology represents industry best practice and has been endorsed by the British Property Federation, as set out in the Levelling Up – The Logic of Logistics' Report (BPF and Savills 2022). The BPF Industrial Board, who commissioned the report, consists of many of the major investors and thought leaders in the I&L sector including St Modwen, The United Kingdom Warehousing Association, IM Properties, Newlands Developments, Segro, GLP, Tritax Symmetry and the BPF itself. The report is also referenced in the DfT's 'Future of Freight Plan'. The Savills approach is more appropriate, and more accurately reflects true market demand, than the varying methodologies used by South Staffordshire and the other local authorities within the FEMA.

As set out in the National Planning Policy Framework, local plans should be prepared positively, in a way that is aspirational but deliverable (paragraph 16). As such it is essential that the employment evidence base provides a true representation of the future requirements of the area and does not under-forecast the employment need resulting in local plan policies which constrain supply. Such a constraint to supply will result in a suppressed demand, as not all occupiers will be able find space to meet their needs. As a result businesses are either forced to remain in their existing premises, even if not ideal for their operational requirements, or alternatively have to



leave the area to find suitable premises elsewhere, taking the jobs and investment they generate with them (paragraph 6.2.2 Industrial and Logistics Need Assessment).

The Industrial and Logistics Need Assessment concludes that:

'Based on Savills demand methodology, over a 20-year plan period, we estimate there is a shortfall in employment floorspace of 7.4 million sqft (196 ha) within the FEMA increasing to 20 million sqft (532 ha) if Sandwell is included.

Within South Staffordshire specifically, we consider there to be a shortfall of 2.9 million sqft (76 ha) under our low range scenario increasing to 9.7 million sqft (257 ha) under our upper range scenario. Part of the reason for these significant shortfalls is that only a small proportion (up to 10%) of the nationally significant WMI will meet local demand from South Staffordshire. The remainder of the development will meet a wider sub-regional and national demand profile given the extremely large size of units proposed' (paragraphs 9.1.7 and 9.1.8).

This shortfall needs to be fully understood and addressed for both South Staffordshire and the FEMA.

Landscape Sensitivity Assessment

As part of the South Staffordshire Landscape Sensitivity Assessment (LSA), the Junction 13 site is assessed (ref. SL94) in relation to how sensitive its landscape is to change as a result of introducing built development. For the land east of the watercourse running through the site (47.84 ha), the assessment concludes that its landscape sensitivity is 'medium'. The assessment concludes that:

'Whilst the area has relatively high visibility due to its open character, this is very localised due to the flat topography. The area has a relatively simple, large scale landscape pattern with limited time depth and valued natural features. It is also adversely affected by proximity to the M6. This combination of attributes results in an overall low-moderate landscape sensitivity to residential development. The sensitivity of the landscape increases with distance from the motorway corridor' (LSA Appendix 1 page A1.443).

This conclusion relates to a larger area than is now being proposed for allocation. The land now being put forward is the 17.61 ha to the east of the railway (as shown in Figure 1 below). It is considered that the sensitivity of just the land to the east of the railway, being land closest to the motorway corridor would be less than identified within the Assessment for the wider site.

3. Sustainability Appraisal (SA) (paragraph 3.10)

The findings of the SA are questioned in relation to the strategy proposed for employment growth (paragraph 5.3.9-14 SA Vol 2). Three growth options are assessed:

- *'Employment Growth Option A – To reflect the oversupply of employment land in the district, deallocate the poorest quality employment land as identified by the EDNA and reallocate poorer quality sites that would be suitable for alternative uses;*
- *Employment Growth Option B – Maintain current protections for the existing employment land stock; and*
- *Employment Growth Option C – Allocate additional employment land to meet cross boundary employment needs, where an undersupply in other areas of the Functional Economic Market Area (FEMA) is robustly demonstrated.'*

The SA concludes that the option with the most positive impacts across the SA objectives would be Option A. However, Option C is considered to make the greatest contribution to the unmet employment floorspace need, and Option B has the most uncertainty. The SA does not reach a conclusion as to whether Option A or C is the best performing.

However, it is stressed that the SA is based on a significant underestimate of employment need in South Staffordshire and the wider FEMA. Based on the findings of the Savills Industrial and Logistics Need Assessment it is considered that Employment Growth Option C is the appropriate way forward, though it is maintained that additional allocations will be required to address both the FEMA's employment needs and also SSDC's needs.

SA Vol 2 paragraphs 5.4.7-12 is an appraisal of employment distribution options for the plan area. Option A '*Continue with the existing policy approach and focus employment growth around the four existing freestanding strategic employment sites (ROF, i54, Hilton Cross and Four Ashes)*' is assessed as being potentially the best performing option. Option B '*Identify new freestanding employment sites*' is the lowest scored option due to negative scores for potential impacts on biodiversity, landscape and natural resources.

However, to deliver industrial and employment land for units of $\geq 100,000$ sqft, the need for which is identified in the Savills Industrial and Logistics Need Assessment, it is considered that based on the existing supply of sites, new freestanding sites will be required. These would need to be capable of accommodating a series of $>100,000$ sqft units in suitable locations, principally these should be outside of the Green Belt and well connected to the strategic highway network.

It is noted that all options have a neutral score (SA Vol 2 Table 5.6) in relation to 'Transport and Accessibility'. The assessment does not take into account the potential for locating freestanding employment sites where they would have direct access to the strategic highway network. Furthermore, it is unclear why only option B received negative scores in terms of biodiversity and landscape. Sites around the four freestanding strategic employment sites (Option A), small scale employment allocation in villages (Option C) and employment sites in mixed-used schemes (Options D) all have the potential to have negative impacts on biodiversity and landscape, particularly if greenfield sites are being considered.

It is considered that the SA needs to be revised to take into account a greater need for employment land in the SSDC area, which should be identified through a re-assessment of the EDNA findings.

In relation to site specific SA assessments, Appendix F.19 of the SA considers 15no. 'Reasonable Alternative' Sites (pre-mitigation). This includes site E30 'Land south of Junction 13 (M6)'. It is noted that the site is shown as 70.36 ha and includes approximately 52.75 ha to the west of railway line that runs through the site. We would like to clarify that, as an alternative to E30, the 17.61 ha of land to the east of the railway is now being promoted for inclusion as an employment allocation in the SSDC Local Plan (Figure 1).

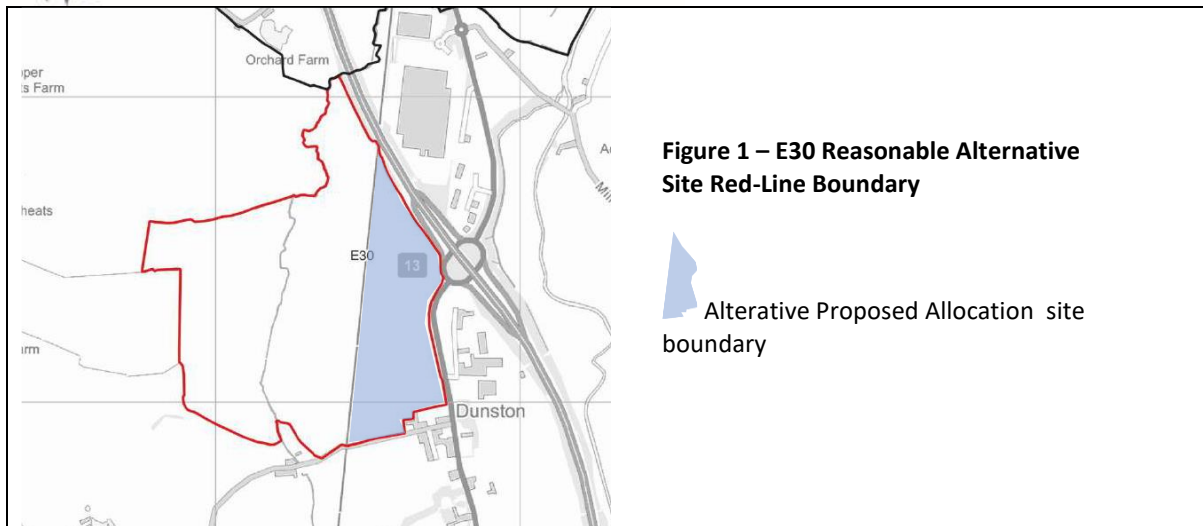


Figure 1 – E30 Reasonable Alternative Site Red-Line Boundary

Alternative Proposed Allocation site boundary

H.4 of the SA Vol. 3 sets out the reasons for rejecting reasonable alternative employment sites. For E30 the Council notes that *'the site performs relatively well and has a clear advantage for distribution/logistics of being close to the M6 (J13) and is not in the Green Belt'*. The assessment does note that some concerns have been raised by Staffordshire County Council (SCC) highways relating to *'site access and the significant highways works that would likely be required'*. However, it is stressed that those comments from SCC relate to the wider 70.36 ha site and not the 17.61 ha now being proposed for allocation. A 70.36 ha scheme would have a significantly greater impact on the capacity of junction 13 of the M6 than the land now being promoted.

It is also noted that the SCC comments set out in evidence document 'Employment Sites Highways Comments 2022' states that the 70.35 ha scheme at E30 would be *'Ok in principle subject to significant highways works and Highways England consultation'*.

The Vision Document accompanying these representation includes designs for a potential site access onto the A449, capable of accommodating traffic from an employment scheme. It also includes an assessment of the potential impacts on the wider highway network, demonstrating that following delivery of the floorspace proposed, the M6 Junction 13 and A449 would operate within capacity following development taking place. This assessment takes into account the proposed housing allocation and permission at Penkridge (1,329 units), along with other proposed allocations and the WMI. The consented M54/M6 Link Road has also been included in the assessment work. As such the findings of this work are considered robust. (A Highways Scoping Report is attached a Appendix 3).

The reason set out in H.4 for rejecting the site is that the *'supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI'*. However, as identified above it is maintained that there is a significant undersupply of employment land in South Staffordshire and the wider FEMA to meet the substantial demand identified. The Junction 13 site would be an appropriate employment allocation being at a key junction on the strategic highway network with direct access to the M6 corridor; being sustainably located in terms of a workforce and public transport links; and being the only remaining non-Green Belt site in South Staffordshire which is not constrained by other factors such as flood risk. The development of the site for employment would make a significant contribution to addressing that undersupply.

4. Issues and Challenges for South Staffordshire (paragraph 3.15 & tables 1-5)

Table 2 – SWOT Analysis

‘Strengths - Very well served (particularly in the north) by national railway and highway transport corridors, with good access to nearby major conurbations’ – the reference to the north of South Staffordshire being well served by highway transport corridors is noted. The industrial and logistics site proposed at Junction 13 of the M6 is extremely well located to make best use of these transport corridors and serve the FEMA and beyond.

‘Weaknesses - Reliance on neighbouring areas for higher order services and a dependency on their economic health for access to employment’ – the development of an industrial and logistics site at junction 13 would make a significant contribution to providing a wide range of jobs, requiring a breadth of skills and experience, within South Staffordshire which would be available to existing and future residents of the district.

In particular it is noted that there is a Strategic Housing Allocation proposed at Land North of Penkrudge (Policy SA4), approximately 2.5km south of the Junction 13 site. A minimum of 1,129 homes are proposed to be delivered as part of the Penkrudge allocation but no land for employment is identified. Both the Penkrudge allocation and the Junction 13 site are located on the A499, so would be extremely well connected by both car and bus routes.

‘Opportunities - Continued development of the strategic employment sites including at i54 South Staffordshire, ROF Featherstone and West Midlands Interchange leading to greater inward investment and prosperity’ – recognition of the opportunities that can come from greater inward investment and prosperity are welcomed. However, it is stressed that further employment sites will need to be identified within South Staffordshire to ensure that a lack of supply does not further suppress demand.

As detailed in the Savills Industrial and Logistics Need Assessment, the market has been supply-constrained for a considerable period of time, which in turn has suppressed demand as not all occupiers can find space to meet their needs. As a result occupiers are either forced to remain in their existing premises, even if not ideal for their operational requirements, or alternatively have to leave the area to find suitable premises elsewhere, taking the jobs and investment they generate with them.

‘Threats - Lack of available brownfield land in the district’ – The lack of brownfield land in South Staffordshire is noted. Due to this constraint it will be necessary to look to greenfield sites to address the pressing employment need in the district and wider FEMA. As the only remaining non-Green Belt site located on a motorway junction in South Staffordshire, which is not constrained by other factors such as flood risk, the Junction 13 site at Dunston is a logical location for employment development. As demonstrated in the accompanying Vision Document (Appendix B) the site is deliverable, being in a suitable location for an employment scheme, where development is achievable, and has a realistic prospect of coming forward in the short term.

Table 4: Economic Prosperity – Issues and Challenges

‘Levels and types of growth needed’ – The attractiveness of South Staffordshire for commercial development, including medium and large business is highlighted, along with the key challenge of

providing a mixed portfolio of employment in terms of quality, size and use. We agree that it is critical that SSDC maintains an appropriate supply of employment land. As set out previously, in both South Staffordshire and the FEMA there has been an under supply of employment land and premises. That constraint has suppressed demand as not all occupiers have been able find space to meet their needs. As a result businesses have had to look outside of the area to find suitable premises, taking the jobs and investment they generate with them.

The acknowledgement of the important of creating more skilled jobs and increasing the retention of young, educated residents is supported. The industrial and logistics sector provides a diverse range of jobs. The proposed Junction 13 site is an opportunity to deliver circa. 635K sq. ft. of industrial and logistics space, delivering approximately 885 jobs.

Section 4 of the Industrial and Logistics Need Assessment details the wide-range of well paid jobs and training opportunities offered in the sector. Figure 4.13 'Occupational Distribution in Manufacturing, Transport & Storage (2010 vs 2019)' demonstrates how the employment opportunities within industrial and distribution businesses have changed over recent years to provide a wider spread of job opportunities, including a growth in technical and professional jobs (e.g. IT and engineering), while the need for process, plant and machine operatives has stayed constant.

Additionally, the supply chains of industrial and logistics businesses are also an important consideration. As set out in paragraph 4.4.7 of the Industrial and Logistics Need Assessment, analysis of ONS Type I FTE multipliers for the warehousing sector suggests that for every 10 new warehousing jobs created another 7 to 12 jobs are created offsite across the wider supply chain, many of which will be in South Staffordshire and neighbouring areas.

We actively supports initiatives to improve skills, training and employment opportunities. As noted at paragraph 2.2.21 of the Industrial and Logistics Need Assessment, the logistics sectors is particularly good at providing employment opportunities to those that may not otherwise be in work. Based on a recent independent survey undertaken by YouGov, Frontier-Economics found that 20% of people currently in logistics were previously unemployed and that one in four within this group was long-term unemployed.

The findings of the EDNA are referenced in Table 4 of Chapter 3. However, as set out previously, the outputs of the EDNA are challenged as they do not consider market conditions which influence demand.

'Supporting the economies of adjoining areas' – It is noted that a significant proportion of South Staffordshire's population travels to work outside of the district. To help address this issue the development of additional employment land, such as a industrial and logistics site at junction 13, would make a significant contribution to providing a wide range of jobs within South Staffordshire which would be available to existing and future residents of the district.

The significant unmet need of the Black Country is noted, along with South Staffordshire's role in meeting it. At present there is uncertainty as to the unmet need of the Back Country authorities and this must be fully understood before SSDC can confirm its employment land requirements. SSDC has a critical role to play in assisting the Black Country authorities in achieving their employment land requirements and, as part of this, available non-Green Belt sites on the M6 corridor should prioritised for development. As shown in the accompanying Vision Document, the



Junction 13 site is capable of providing a significant employment location for a range of unit sizes, to contribute to the requirements of both SSDC and the Black Country authorities.

'Supporting higher education attainment, the development of skills and access to training and employment opportunities' – As set out above, we are fully committed to addressing this issue/challenge.

Table 5: Natural and Built Environment – issues and challenges

'Protecting the Green Belt' – Reference is made to 80% of South Staffordshire being designed Green Belt. This has resulted in significant pressure to release sites from the Green Belt. The Junction 13 site is not within the Green Belt and as such the allocation of the site would not require the Green Belt boundary to be altered, which should only be done *'where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans'* (NPPF paragraph 140).

The table also states that *'when planning to meet housing needs, authorities should direct development away from Green Belt where possible'*. This section should reference both housing and employment needs.

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 cooperate 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.

1. An agreed Duty to Cooperate Statement of Common Ground is required for the South Staffordshire FEMA. This should confirm the requirements of the FEMA local authorities and Sandwell, following the termination of the joint Black Country Plan preparation. Without a full understanding of the implications of this on the requirements of the FEMA authorities and wider West Midlands, the employment land requirements for SSDC cannot be confirmed.

2. The employment land needs for South Staffordshire and the wider FEMA authorities are queried, due to the inconsistencies between the methodologies used for individual EDNAs. Additionally, it is considered that all of the FEMA EDNAs under-forecast employment requirements. The methodology used should be reviewed, as per Savills recommendations in its Industrial and Logistics Need Assessment.

It is essential that the employment evidence base provides a true representation of the future requirements of the area. As such an updated EDNA should be produced which addresses the methodology points raised.

3. The SSDC Local Plan Reg 19 Sustainability Appraisal considers a series of employment growth options. It is stressed that the evidence supporting the SA significantly underestimates the employment need in South Staffordshire and the wider FEMA. Based



on the findings of the Savills Industrial and Logistics Need Assessment it is considered that Employment Growth Option C is the appropriate way forward, though it is stressed that the additional allocations will be required to address both the FEMA’s employment needs and also SSDC’s needs. The SA should be revised to address the findings of an updated EDNA.

The SA assessment carried out for E30 ‘Land south of Junction 13 (M6)’ should be re-assessed in light of the reduced site area which is now being promoted.

- 4. The issues and challenges for South Staffordshire are noted. It is maintained that the findings of the EDNA need to be reconsidered to ensure that sufficient employment land is made available to address a number of the issues and challenges raised.

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:

To provide further clarification and oral contributions to the Local Plan hearing sessions.

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.



South Staffordshire Council

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 <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

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