

	<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 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)

<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 <input style="width: 90%;" type="text" value="St Modwen Logistic &amp; J Holts and Son"/></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 <input style="width: 90%;" type="text"/></p>	<p><input style="width: 90%;" type="text"/></p> <p><input style="width: 90%;" type="text" value="Andrea"/></p> <p><input style="width: 90%;" type="text" value="Caplan"/></p> <p><input style="width: 90%;" type="text" value="Associate"/></p> <p><input style="width: 90%;" type="text" value="Savills"/></p> <p><input style="width: 90%;" type="text" value="55 Colmore Row"/></p> <p><input style="width: 90%;" type="text" value="Birmingham"/></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="B3 2AA"/></p> <p><input style="width: 90%;" type="text" value="0121 615 2662"/></p> <p><input style="width: 90%;" type="text" value="andrea.caplan@savills.com"/></p>
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(where relevant)

## 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 4 Vision and Strategic Objectives	Policy		Policies Map	
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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

We object to the South Staffordshire Local Plan 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.

**Strategic Objective 2:** Seeks to meet the housing and employment needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham and Black Country Housing Market Area and wider Functional Economic Market Area.

This objective is supported. However, as set out in representations to Chapter 3, the identified employment land needs for South Staffordshire and the wider FEMA authorities are challenged, 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 (Savills December 2022 – Appendix A of these representations).

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. In light of this we **object** to the evidence base supporting Strategic Objective 2.

**Strategic Objective 6:** Promotes the development of an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward

investment and job creation in key sectors such as advanced manufacturing and providing the skills to enable residents to access these jobs.

This objective is also supported. However, as set out in representations to Chapter 3, local plans should be prepared positively, in a way that is aspirational but deliverable (paragraph 16 NPPF). 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 requirements 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).

It is maintained that the current employment strategy set out in the SSDC Local Plan does exactly this and will not fulfil the requirements of Objective 6.

Industrial and logistics should be recognised as 'critical national infrastructure' as highlighted in the 'Levelling Up - The Logic of Logistics' report (British Property Federation 2022 – attached as Appendix C). The report identifies that alongside their supply chains, Industrial and Logistics support the functioning of our economy and the way we live our lives, by ensuring we have what we need. They are as critical as the roads, rail, airport and port facilities needed to move goods around the country (page 4).

Reflecting this critical national infrastructure role, demand for industrial and logistics has been growing significantly over the past 10 years and is projected to keep on growing, and as set out in representations to Chapter 3 and in the accompanying Industrial and Logistics Need Assessment.

Facilitating growth in the industrial and logistics sector is also a key priority of the NPPF, namely:

Paragraph 81 which states: '*Planning policies and decisions should help ..... The **approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.** This is particularly important where Britain can be a global leader in driving innovation, and in areas with **high levels of productivity**, which should be able to capitalise on their performance and potential.'*

Paragraph 83 which states: '*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for **storage and distribution operations** at a variety of scales **and in suitably accessible locations.***'

(Savills' emphasis in bold)

The industrial and logistics sector is one of the most productive and dynamic employment sectors. In particular Planning Practice Guidance (PPG) goes on to identify that '*the logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning*



policies (separately from those relating to general industrial land)' (031 Reference ID: 2a-031-20190722).

The only way the U.K. will close the productivity gap to Western European peers is to facilitate growth in the most productive sectors of the economy, including industrial and logistics. Sites located directly adjacent to major motorway junctions such as Land at Dunston are critical to facilitating this growth in accordance with the requirements of Paragraph 83 of the NPPF. However, as matters stand, the Plan significantly underestimates the true extent of demand in the sector, and fails to deliver sufficient allocations to achieve Objective 6.

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.

While the objectives of the Local Plan are supported in principle, the points set out above need to be considered when developing the policies. As set out at paragraph 4.2, the plan's policies are the means of achieving the vision and objectives through the development management process. As such, policies need to be positively prepared and justified, and provide a strategy which seeks to meet the area's objectively assessed needs. It is therefore key that the employment needs of the area are appropriately assessed through the EDNA. At present it is maintained that this is not the case.

**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.**

**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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX