

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</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 (where relevant) <input style="width: 90%;" type="text" value="St Modwen Logistic & 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	<input type="text"/>	Policy	Policy DS5: Spatial Strategy to 2039	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	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.

We **object** to Policy DS5 'The Spatial Strategy to 2039' as written as it is not considered justified.

Policy DS5 sets out a settlement hierarchy for South Staffordshire which seeks to locate employment development within in the Tier 1-3 settlements. The policy also seeks to restrict development in rural areas outside of the districts existing settlements. However, support is given for further development at the district's freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes).

In light of the conclusions of the Savills Industrial and Logistics Needs Assessment (attached as Appendix A), it is considered that there is a significant shortfall of employment of land in South Staffordshire of between 76 ha and 257 ha, based in the scenarios considered in the assessment. As such further employment sites must be allocated to meet the needs of the district in the plan period.

While Policy SA7 lists the employment allocations proposed within South Staffordshire, it is maintained that these are insufficient and should be supplemented by further allocations of a size capable of addressing the actual



employment needs of SSDC. Furthermore, and as set out in representations to Policy DS3, Policy DS5 should also be amended to enable sufficient flexibility to deliver additional employment sites, as and when required to address the identified needs of SSDC and the wider FEMA.

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.

It is requested that the following additional text be included in Policy DS5, following the section relating to 'free standing strategic employment sites':

Other Employment Locations

Where evidence indicates an immediate need or demand for additional employment land (E(g), B2 and B8) that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations outside of the district's settlements in the open countryside, subject to proposals:

- a. Being accessible or will be made accessible by a choice of means of transport, including sustainable transport modes, as a consequence of planning permission being granted for the development; and
- b. Having good access to the strategic highway network (M6 motorway) and an acceptable impact on the capacity of that network, including any junctions; and
- c. Not being detrimental to the amenities of any nearby residential properties or the wider environment.

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 or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX