

	<h2 style="margin: 0;">Local Plan</h2> <h3 style="margin: 0;">Publication Stage</h3> <h3 style="margin: 0;">Representation Form</h3>	<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)

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



(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 SA7: Employment Allocations	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 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 SA7 ‘Employment Allocations’ on the basis that it is not justified or supported by appropriate evidence. The policy does not provide sufficient employment land to address the needs of South Staffordshire during the Local Plan period.

Policy SA7 identifies five sites for allocation. These include the West Midlands Interchange (WMI), which Table 9 identifies will provide 232.5ha of employment development land (excluding green infrastructure), though only 18.8ha of WMI will contribute towards meeting South Staffordshire’s labour demand. It is noted that the West Midlands Strategic Rail Freight Interchange (SRFI) Employment Issues Response Paper (Stantec 2021) recommends that local authorities assumes the developable area at WMI to be 193 ha, based on the consented DCO (paragraph 2.1.8). It is unclear why South Staffordshire has increased this area by 39.5 ha. The SFRI Paper identifies that the majority of the remainder of the WMI will contribute to the Birmingham and Black Country Markets.

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 land in South Staffordshire of between 76 ha and 257 ha, based on the scenarios considered. As such further employment sites need to be allocated to meet the needs of the district and wider FEMA in the plan period. To make the Local Plan sound, Policy SA7 should be amended to enable further

employment sites to come forward in appropriate locations. This is in accordance with our representation to Policies DS3 and DS5.

The SSDC Economic Strategy and Employment Site Assessment Topic Paper November 2022 assesses the suitability of existing employment allocations which, as of April 2020, did not benefit from planning permission and also considers 28 new sites, which have been identified through the ongoing SHELAA work and previous employment land assessments. It is noted that due to the very limited supply of brownfield land in South Staffordshire, all of 28 sites were located in either the Green Belt or open countryside.

The only potential employment sites identified which are not located within the Green Belt are:

- E30 Land South of Junction 13 of the M6 (75 ha, although a 17.61 ha area to the east of the railway is being promoted as an alternative to the wider E30 site);
- E57 Land at Mount Pleasant Dunston (2.6 ha) ; and
- E04 land around Dunston Business Village (3.6 ha).

All three sites are in close proximity to junction 13 of the M6, though it is noted that only E30 (Junction 13) is of a size capable of delivering any significant level of industrial and logistics development.

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 and supporting technical information (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.

The South Staffordshire EDNA Part 2 (paragraph 5.3), produced to inform the selection of specific employment sites in the Local Plan, considered the Junction 13 site along with other potential employment sites. The report recommended that 'should there be a need to allocate new sites, where possible the focus should be on the 'best' sites in the first instance. These for example should include':

- West Midlands interchange (Site E33) following the sites consent in 2020
- Sites E51a and E51b given that these are very close to the consented WMI; and
- **Potentially site E30 at Junction 13 given that it is strategic in scale and not in the Green Belt (although it is acknowledged that this site fell within the 'good' rather than 'best' category).** [Savills emphasis].
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The West Midlands Interchange (WMI) is now a proposed allocation, following the granting of a DCO in 2020. Sites E51a (6.96ha) and E51b (1.92ha) are not proposed allocations but are relatively small and could potentially come forward as extensions to the WMI. This leaves Junction 13 (E30) (Land at Dunston – the site promoted by St. Modwen and J Holts and Sons) as the only remaining site recommended in the EDNA Part 2 as being suitable for allocation.

Land at Dunston is ideally located to cater for the significant demand for Industrial and Logistics premises and is capable of delivering a range of unit sizes to complement existing and proposed future land uses in the area and to meet the increasingly high-quality requirements of the sector.

The M6 motorway is a nationally significant movement corridor. Being a deliverable site, as demonstrated in the Vision Document, directly adjacent to a junction on such an important motorway is extremely beneficial for Industrial and Logistics occupiers and logistics companies in particular, meaning the site is one of the best located in the wider sub-region.

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 'Land south of Junction 13, M6' site be included as an employment allocation in the Local Plan. Policy SA7 'Employment Allocations' should be amended as follows:

The following sites will be allocated to ensure that the district's employment land target identified in Policy DS4 is met.

Site Reference	Site Name	Area (Ha) of employment site for allocation	Employment Type (Use Class)
E14	Vernon Park	2.8	E(g); B2; B8
E18	ROF Featherstone	36	E(g); B2; B8
E20	Hilton Cross	4.8	E(g); B2; B8
E24	I54	4.8	E(g); B2
E44	I54 western extension (north)	16.7	E(g); B2
E33	West Midlands Interchange (WMI)	297	B8
<u>E30 (part)</u>	<u>Land South of Junction 13, M6</u>	<u>17.61</u>	<u>E(g); B2; B8</u>

The above sites represent those within the district's pipeline supply of sites as at April 2020 without a full planning permission (or lawful use certificate), in addition to West Midlands Interchange.

In additional, it is requested that the following text be added to Policy SA7 as a part 2:

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