

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

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 &amp; 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	<input type="text"/>	<input type="text" value="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 EC3- Employment and Skills	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.

Policy EC3 'Employment and Skills' promotes the delivery of employment and training opportunities to local residents. As set out in chapter 3 of the Local Plan, 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. As illustrated in the accompanying Vision Document for Land at Dunston, the site promoted by St.Modwen and J Holts and Sons, the site provides a key opportunity to deliver circa. 635K sq. ft. of industrial and logistics space, delivering approximately 885 jobs.

Section 4 of the Savills Industrial and Logistics Need Assessment (attached as Appendix A) 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 support initiatives to improve skills, training and employment opportunities. Indeed, St. Modwen Logistics is the latest partner to join the NSCG-led consortium of education providers and employers from across the Midlands to form the Stoke-on-Trent and Staffordshire Institute of Technology (IoT) development.

As noted at paragraph 2.2.2 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.

By allocating additional employment land the Council would support sustainable economic growth, facilitate access to training and employment opportunities, and deliver significant socio-economic benefits. This would in turn respond positively to the opportunities provided within the district, notably the accessibility of the Strategic Road Network, which is extremely beneficial for Industrial and Logistics occupiers and logistics companies in particular.

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.

(Continue on a separate sheet /expand box if necessary)

**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