



Local Plan
Publication Stage
Representation Form

Ref:

**(For
official
use only)**

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	Ms	Mr
First Name	Sarah	Fred
Last Name	Day	Davies
Job Title (where relevant)	Senior Land Manager	Consultant
Organisation (where relevant)	Clowes Developments	Harris Lamb
Address Line 1	Ednaston Park	Grosvenor House
Line 2	Painters Lane	75-76 Francis Road
Line 3	Ednaston	Edgbaston
Line 4	Derbyshire	Birmingham
Post Code	DE6 3FA	B16 8SP
Telephone Number	01335 360353	0121 455 9455
E-mail Address (where relevant)	sarah.day@clowes.co.uk	fred.davies@harrislamb.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	<input type="text"/>	Policy	<input type="text" value="EC1"/>	Policies Map	<input type="text" value="Further Employment Land to be allocated"/>
-----------	----------------------	--------	----------------------------------	--------------	--

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	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 EC1 identifies 5 strategic employment sites. However of these, Hilton Cross is now largely developed and the West Midlands interchange is designed for regional/national requirements and is unlikely to meet the needs of local businesses.

Land at I54 is also largely taken up. In this context further land needs to be developed and the policy should be amended to make it clear that other development opportunities are being brought forward to meet the needs of the Black Country overspill which have not been met. We have explained concerns about the failure to meet the Black Country overspill in separate representations.

In this context it is noteworthy that the policy does not make reference to meeting the wider needs of the Black Country.

In this context the plan does not meet the Duty to Cooperate by failing to meet the needs of other authorities who have a functional and economic relationship with South Staffordshire.

Turning to the test of soundness, the Objector’s position is as follows:

- 1) *Positively Prepared*; The strategy does not meet the areas objectively assessed needs because it fails to identify sufficient employment land to meet the overspill requirements of the Black Country. There is insufficient evidence to demonstrate that, with the close socio economic ties between South



Staffordshire and the Black Country, the employment land requirement meets the objectively assessed needs and, given the extremely low vacancy rates on existing employment areas in the Black Country, more land needs to be released to meet the employment needs of the Black Country.

- 2) *Justified*; The strategy cannot be appropriate because it fails to meet the objectively assessed needs and fails to release sufficient Green Belt land to allow allocations to be made to meet these needs. Furthermore, the Objector has pointed out that some of the assumptions regarding employment land requirements are unjustified with reductions being made in certain sectors of the economy which are unlikely to be affected by Covid in terms of floorspace. Thus the employment land requirement has been set at an artificially low level.
- 3) *Effective*; The strategy would not be effective. It does not provide for employment needs over the plan period. Simply deferring the issue to a further Local Plan review is inappropriate and would mean that the economic benefits of development in terms of delivering the three elements of sustainability set out at paragraph 8 of the Framework cannot be delivered. It is clear from an examination of the draft Statement of Common Ground that agreement has not yet been reached in respect of employment needs and that once these are considered on a proper, objective basis, sufficient land has been released in a plan area which is based suited to meet those needs.
- 4) *Consistent with National Policy*; As noted above, the failure to provide sufficient land to meet the reasonable overspill requirements of the Black Country means that the plan is not in alignment with the economic objectives of sustainability and the provision of economic opportunities as set out at paragraphs 8a and 81 of the Framework.

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

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.

A new paragraph should be added to EC1 as follows:

Further land will need to be released to meet the overspill employment needs of the Black Country and allocations have been made as set out on the proposals map in this regard.

The strategy will be justified, meeting known requirements and would be preferable to the alternative of not meeting these.

Finally the plan, as modified, would then be in line with national policy regarding economic development and the economic strand of sustainability.

(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:

The emerging plan will fail to deliver enough employment land to meet the overspill requirements of the Black Country. One of the fundamental roles of the plan is to deliver a sufficient amount of employment land to meet economic needs and the plan fails to do this. Given the magnitude of this issue we request the opportunity to address the Inspector to outline our concerns.

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>



South Staffordshire Council

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