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|  | <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 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

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: 95%;" type="text"/></p> <p>First Name <input style="width: 95%;" type="text"/></p> <p>Last Name <input style="width: 95%;" type="text"/></p> <p>Job Title (where relevant) <input style="width: 95%;" type="text"/></p> <p>Organisation (where relevant) <input style="width: 95%;" type="text" value="St Modwen Strategic Land Limited and J&M Holt"/></p> <p>Address Line 1 <input style="width: 95%;" type="text" value="C/o Agent"/></p> <p>Line 2 <input style="width: 95%;" type="text"/></p> <p>Line 3 <input style="width: 95%;" type="text"/></p> <p>Line 4 <input style="width: 95%;" type="text"/></p> <p>Post Code <input style="width: 95%;" type="text"/></p> <p>Telephone Number <input style="width: 95%;" type="text"/></p> <p>E-mail Address <input style="width: 95%;" type="text"/></p> | <p><input style="width: 95%;" type="text"/></p> <p><input style="width: 95%;" type="text" value="Andrea"/></p> <p><input style="width: 95%;" type="text" value="Caplan"/></p> <p><input style="width: 95%;" type="text" value="Associate Director"/></p> <p><input style="width: 95%;" type="text" value="Savills (UK) Limited"/></p> <p><input style="width: 95%;" type="text" value="55 Colmore Row"/></p> <p><input style="width: 95%;" type="text" value="Birmingham"/></p> <p><input style="width: 95%;" type="text"/></p> <p><input style="width: 95%;" type="text"/></p> <p><input style="width: 95%;" type="text" value="B3 2AA"/></p> <p><input style="width: 95%;" type="text" value="0121 615 2662"/></p> <p><input style="width: 95%;" 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 | Chapter 4 – Vision and Strategic Objectives | Policy | | Policies Map | |
|-----------|---|--------|--|--------------|--|

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.

Strategic Objective 6 'Building a strong local economy' set out in Table 6 of the Publication Plan 2024 is **supported**. The objective states SSDC will 'develop 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**' [Savills Emphasis].

The additional allocation of Junction 13, M6 Stafford (E30) will assist in achieving this objective and is **strongly supported**. Figure 10.1 of the Savills Industrial and Logistics Needs Assessment (February 2024) (Appendix 1) presents the economic benefits expected to be generated from the Proposed Development. 90 on-site (gross) construction jobs are expected to be generated per annum over the estimated 50 year construction period and 880 on-site jobs (gross) are expected to be generated by the proposed development. In terms of operational jobs, it is estimated that 420 on-site and off-site jobs are expected to be generated for South Staffordshire residents. St. Modwen is also committed to the implementation of a comprehensive employment and skills plan to further bolster the economic benefits of the development.

As set out in our representations to Chapter 3, it is important 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. Although the



2024 Publication Plan allocates more employment (around 8.75 hectares additional) than the 2022 Publication Plan, this is not considered to be sufficient to meet the actual demand. Savills' demand estimates are significantly higher than the 2022 and 2024 EDNA estimates and so there is still a clear shortfall in Industrial and Logistics sites being allocated. Paragraph 1.2.4 of Savills' Industrial and Logistics (I&L) Needs Assessment – Addendum Note (Appendix 2) concludes that there is a shortfall of between 15 and 63 ha.

(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.

No modifications required.

(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 [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)

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