

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<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 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)

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 Director
Organisation (where relevant)	St Modwen Strategic Land Limited and J&M Holt	Savills (UK) Limited
Address Line 1	C/o Agent	55 Colmore Row
Line 2	<input type="text"/>	Birmingham
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
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	DS3 – Open Countryside	Policies Map	<input type="text"/>
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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.

It is stressed that the Local Plan emphasises the need to *‘ensure there is sufficient supply of employment land to meet the needs of the district over the plan period’* (Policy EC1 Sustainable Economic Growth), along with contributing towards the employment needs of the wider functional economic market area (FEMA) arising from the Black Country authorities. Providing sufficient employment land is key to the achieving the Economic Prosperity Strategic Objective and wider Local Plan Vision. We support this principle.

However, we maintain our objection to wording of Policy DS3, which seeks to control development in the open countryside, described in the policy wording as *‘land being outside of the Green Belt and defined settlement development boundaries’*.

For the reasons summarised in our response to Chapter 4, to promote flexibility and resilience in delivering economic growth, and to ensure that employment land can come forward to meet market demand at the appropriate time, we consider Policy DS3 should be amended to enable the delivery of additional large-scale employment sites in appropriate open locations, as and when required to address the needs of SSSC and the wider FEMA.

Paragraph 2.1 of the draft Local Plan identifies that *‘much of South Staffordshire (80%) lies within the West Midlands Green Belt, with the area beyond the Green Belt to the northwest of the district defined as ‘Open Countryside’*. The same can be said for a very large proportion of the FEMA. This means that there is a very limited amount of land not within Green Belt that could deliver strategic employment opportunities while also being well connected to the strategic transport network. Policy wording in the plan should enable non-Green Belt sites to come forward



for employment development where there is evidence of a need to meet market demand. This is in line with paragraph 89 of the National Planning Policy Framework (NPPF) which states '*planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be **found adjacent to or beyond existing settlements.***' [Savills Emphasis]. This amendment would ensure that the draft plan is positively worded and effective.

Furthermore, in terms of meeting the identified employment land needs of SSDC, the deliverability of the ROF Featherstone allocation (E18) should be confirmed, as the site has been allocated for a significant period with no indication of progress on site to date.

(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.

It is requested that the following additional text be included in Policy DS3 as a penultimate paragraph in the policy:

*Where evidence indicates an immediate need or demand for additional employment land (Class E(g)ii, E(g)iii, B2 and B8 or sui generis employment generating uses) that cannot be met from land allocated in this plan, the Council will favourably consider proposals that meet the identified need in appropriate locations outside of the district's settlements in the open countryside. Such development should be delivered in accordance with the requirements of other policies within the local plan.*

It is also requested that the fourth paragraph of Policy DS3 be amended as follows to provide the flexibility needed to address the employment needs of South Staffordshire:

*All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will only be permitted ~~where they are not located~~ on best and most versatile agricultural land where the benefits of the scheme outweigh the economic and other benefits of that agricultural land and are fully consistent with any other relevant policies set out elsewhere in the Local Plan. These include, but are not limited to, policies which relate to the district's:*

- overall development strategy
- design standards
- landscape character and assets
- historic assets
- ecological assets and biodiversity
- recreational assets
- housing mix requirements (where applicable)



- *sustainable travel requirements*

(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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX