

	<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 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"/>	<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 Director"/>
Organisation (where relevant)	<input type="text" value="St Modwen Strategic Land Limited and J&amp;M Holt"/>	<input type="text" value="Savills (UK) Limited"/>
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

Policy

Policy DS4:  
Development  
Needs

Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant

Yes

No

(2) Sound

Yes

No

(3) Complies with the  
Duty to co-operate

Yes

No

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.

As set out in our responses to Chapter 3, Chapter 4 and Policy DS3 we consider that the 2024 EDNA underestimates the employment need. We therefore **object** to part b) of policy DS4, which sets out the employment needs for SSDC.

Our full analysis of employment demand is contained within the accompanying Savills Industrial and Logistics (I&L) Needs Assessment – Addendum Note (May 2024) (Appendix 2) and the Savills Industrial and Logistics Needs Assessment (February 2024) (Appendix 1). In summary, based on Savills’ baseline demand methodology, including an e-commerce uplift, over a 20-year plan period, we estimate FEMA-wide I&L demand to be **810 ha** of land (40.5 ha per annum), rising to **1,082 ha** (54.1 ha per annum) across the FEMA Plus Sandwell. Apportioning these figures down to South Staffordshire results in demand of between **166 and 184 ha** (8.3-9.2 ha per annum) over the same time period. We consider these demand estimates to be a true representation of market demand using a PPG compliant methodology.

As set out within the Savills Addendum Note (May 2024), sensitivity tests have been undertaken to understand what could happen to I&L demand under different demand scenarios. The results of the sensitivity testing confirm that employment land needs continue to exceed the figure expressed within the Council’s EDNA and Local Plan, with our sensitivity testing identifying a range from 136ha at the lower end to 184ha at the higher end resulting in a shortfall in supply in South Staffordshire alone of between 15ha and 63ha. This analysis underpins our views that a) the employment need figure should be uplifted, b) greater flexibility is required within the Plan to respond to market needs



and changing circumstances, and c) allocation E30 (Dunston) should not be limited to meeting unmet needs only.

The above is further heightened when taking into consideration potential issues with the delivery of the ROF Featherstone Strategic Employment Site (E18), which is proposed to deliver 36ha of employment land within the plan period.

(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.

The employment land needs for South Staffordshire should be uplifted to address methodological weaknesses within the EDNA, to reflect significant demand arising within the wider FEMA and to embed flexibility in the delivery of employment land.

(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