

	<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	<input type="text"/>	Policy	Policy DS5 – The Spatial Strategy to 2041	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.

We **object** to Policy DS5 'The Spatial Strategy to 2039' as written, as it is currently not considered to be justified (NPPF paragraph 35 (b)). While we do not raise any issues with the current policy text, we do request the inclusion of additional text, as set out below.

Policy DS5 sets out a settlement hierarchy for South Staffordshire, which seeks to locate employment development within in the Tier 1-3 settlements. The policy also seeks to restrict development in rural areas outside of the districts existing settlements. However, it is noted that the policy supports further development at the freestanding strategic employment sites within the District (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone / Brinsford, Four Ashes and M6 Junction 13, Dunston).

We fully support the recognition of the proposed allocation (E30) at Junction 13 of the M6, which is consistent with our earlier representations that sought further employment allocations to meet employment demand.

However, in order to be effective and justified, we consider the further flexibility within the Plan is required to ensure that it is capable of adapting to increased demand for employment land within the District and the FEMA.



As set out in our representation to Policy DS3, Policy DS5 should also be amended to enable sufficient flexibility to deliver additional employment sites at appropriate locations, to address the needs of SSDC and the wider FEMA. This would be consistent with paragraph 86 (d) of the NPPF which states that policies should be 'flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices...and to enable a rapid response to changes in economic circumstances' [Savills Emphasis].

(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 DS5, following the section relating to 'free standing strategic employment sites':

Other Employment Locations

Where evidence indicates an immediate need or demand for additional employment land (B1, B2 and B8) that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations outside of the district's settlements and freestanding strategic employment sites. Such development should be delivered in accordance with the requirements of other policies within the local plan.

(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