

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref: (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)

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&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 (where relevant)	<input type="text"/>	<input type="text" value="andrea.caplan@savills.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	Table 9 and Paragraphs 6.45 – 6.48	Policy		Policies Map	
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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 do not agree with Table 9 as currently written in the Plan. This includes proposed allocated sites and sites with planning permission that are not started or under construction at April 2023. We do not consider that the column which states *'available land for employment development 2023-2041-site areas (Ha)'* is currently an accurate reflection of the position.

As explained in our response to Policies DS3 and DS4, the deliverability of ROF Featherstone (36 hectares) should be confirmed. We also consider that the site at i54, Wobaston Road (2.4 hectares) (E24) is overestimated in terms of the land that it can deliver for employment. Part of the site (eastern section) has a reserved matters application approved for an Electronic Vehicle Charging station. It is also noted that I54 western extension (north) (E44) is *'restricted to E(g)/B2 use which means it can only respond to a limited component of market demand'* (paragraph 3.5.1 of the Savills Addendum Note).

In terms of Junction 13, Dunston (E30), whilst the site size sits slightly below the WMSESS optimum size for strategic scale employment, it should be recognised that the site is strategically located on the M6 corridor, and is capable of delivering both mid and big box units (as illustrated within the live outline planning application). The site is therefore capable of contributing towards strategic scale need.

Paragraph 6.46 of the draft plan states *'whilst this site is not needed to increase the district's supply of employment land to meet our own objectively assessed needs for employment land (62.4ha), allocating this site ensures plan flexibility and ensures a very healthy pipeline of sites*



in the District' [Savills Emphasis]. Whilst we agree that the site allocation is necessary and is capable of contributing towards the wider needs of the FEMA, we do not agree that it *only* required to meet unmet needs. Indeed, the Savills Addendum Note demonstrates that the site at Junction 13 of the M6, Junction 13 is required to meet South Staffordshire's need.

(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.

We recommend that the policy wording is amended as follows:

'The plan also allocates an additional strategic employment site at M6 Junction 13, Dunston. This site has the advantage of being non-Green Belt land and is strategically well located adjacent the motorway junction. Whilst this site is not needed to increase the district's supply of employment land to meet our own objectively assessed needs for employment land (62.4ha), allocating this site ensures plan flexibility and ensures a very healthy pipeline of sites in the district. This recognises that allocating additional land will increase the pipeline of sites to more closely reflect recent take up (albeit with a sub-regional component 'built in' due to recent large-scale completions, predominantly at i54). Furthermore, the site's location aligns with a potential broad location for strategic employment land in the West Midlands Strategic Employment Sites Study (2021). Whilst it is slightly under the optimum site size for strategic employment envisaged in the WMSESS 2021, it is still It is of a scale capable of delivering strategic scale employment units, and given its location, is deemed suitable for allocation, and will be subject to further detailed scrutiny through the Development Management process'.

(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