

	<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	<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	<input type="text"/>	Policy	Policy EC1 Sustainable Economic Growth	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 EC1 ‘Sustainable Economic Growth’ as currently written, on the basis that the proposed employment land strategy is not currently justified or supported by appropriate fully tested evidence (NPPF paragraph 35). It is considered that the plan policies and related evidence base do not identify sufficient employment land to address the needs of South Staffordshire during the Local Plan period. As such, while we do not raise any issues with the current policy text, we do request the inclusion of an additional windfall site clause, as requested for Policies DS3 or EC4.

The policy aim (set out in paragraph 1 of the policy) of supporting ‘*measures to sustain and develop the local economy of South Staffordshire and encourage opportunities for inward investment and further economic development of the district*’ is supported.

We also welcome the inclusion of M6 Junction 13, Dunston (E30) as one of six of the district’s employment sites. Policy EC1 emphasises the need to ‘*ensure there is sufficient supply of employment land to meet the needs of the district over the plan period*’ along with contributing towards the employment needs of the wider functional economic market area (FEMA) arising from the Black Country authorities. This is key to the achieving the Local Plan’s Economic Prosperity Strategic Objective and wider Local Plan Vision.

Policy EC1 states that the existing supply of available employment land and allocations in the plan is enough to ensure there is a sufficient supply of employment land. We do not agree with this statement and maintain our position that the employment need figure for the district has been underestimated and as such the plan as drafted is not fully justified or effective. Our full analysis



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 addition to an uplift in the overall employment needs figure, we maintain our position that a windfall or ‘enabling policy’ should be added to the Plan. This would allow further sites to come forward to meet the needs of the district and wider FEMA in the plan period. For example, St. Modwen Logistics control further land to the west of the Junction 13 allocation site (on the western side of the railway) which could address future demand in an appropriate location outside of the Green Belt.

Further detail is set out in our representations to polices DS3 and DS5.

(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.

An additional policy or policy wording (added to Policy DS3 or EC4) should be included that supports windfall employment coming forward. Please refer to our responses to these policies.

(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