



Local Plan

Publication Stage Representation Form

Ref:

(For official use only)

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

 Personal 		Agent's Details (if		
Details*		applicable)		
*If an agent is appointed	d, please complete only the Title, Name and C te the full contact details of the agent in 2.			
Title				
First Name		Andrea		
Last Name		Caplan		
Job Title		Associate Director		
(where relevant)				
Organisation	St Modwen Strategic Land Limited and J&M Holt	Savills (UK) Limited		
(where relevant)				
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Line 2		Birmingham		
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Line 3				
Line 4				
-				
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Telephone Number		0121 615 2662		
•				
F-mail Address		andrea canlan@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	Policy	Policy NB6C Embodied carbon and waste	Policies	s Мар		
4. Do you consider the Local Plan is :						
(1) Legally compliant		Yes	V		No	
(2) Sound		Yes			No	Z
(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.

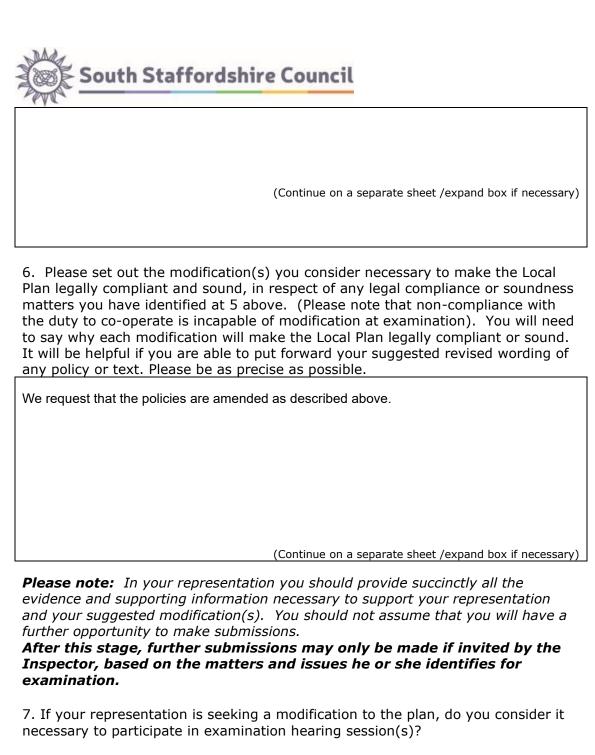
C1. Embodied carbon reporting

We **object** to the policy as written. It is not considered common practice to undertake a whole life carbon assessment. The NPPF (paragraph 16 (b)) states that 'plans should be prepared positively, in a way that is aspirational but deliverable'.

C2.Limiting Embodied Carbon

We **object** to the policy as written and consider it to be onerous and unjustified. If a "limit" is introduced, further flexibility is required to account for abnormal/unavoidable site-specific drivers of carbon which will influence the ability to limit embodied carbon.

We would note that as part of the FHS and FBS December 2023 consultation the Government has stated, 'The government intends to consult on our approach to measuring and reducing embodied carbon in new buildings in due course'. It is possible that the Government will set future national targets for embodied carbon through amendments to the Building Regulations. In the context of the Government's December 2023 statement we would anticipate that a future set of national embodied carbon targets would supersede local requirements. In this context we would recommend that a caveat is added to the policy to reflect this.





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 <u>Data Protection</u> (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