

	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<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" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Jessica"/>
Last Name	<input type="text"/>	<input type="text" value="Graham"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="Taylor Wimpey UK Limited"/>	<input type="text" value="Savills (UK) Limited"/>
Address Line 1	<input type="text"/>	<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 634 8494"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="jgraham@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  Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input 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 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.

Taylor Wimpey support the retention of the adopted ROF Featherstone (site reference E18) allocation within the Draft Plan 2024 where the Plan includes the land (Cross Green) needed to deliver the access road. However, as set out in our separate responses to Draft Policies DS4 and DS5, South Staffordshire District Council’s decision to remove the draft residential-led allocation at Cross Green and the implications on the delivery of the ROF Featherstone site have not been considered within the evidence base which Taylor Wimpey **objects** to.

ROF Featherstone (Site reference E18 in Policy SA5 of the 2024 Plan) is one of the four free standing Strategic Employment Allocations in the District. ROF Featherstone is allocated for Class B1 and Class B2 employment use within the Adopted Core Strategy 2012 and had 14ha of available land for general employment use between 2017 – 2028 according to the South Staffordshire Site Allocations Document (SAD) 2018. The Site is expected to deliver a total of 36ha of employment land and is the largest strategic employment allocation in the emerging Local Plan outside of the West Midlands Interchange.

The ROF Featherstone site was first allocated for B1 and B2 employment use in the superseded 1996 Local plan and additional land was allocated in the adopted Core Strategy and Site Allocations Document. The site was also identified as a priority strategic employment site in the Stoke-on-Trent and Staffordshire Enterprise Partnership (S&SLEP). So there has been a longstanding desire by SSDC and the S&SLEP to see employment delivered on the ROF Featherstone site and it is considered to play an important role in delivering employment in the locality. Table I.3.1. of the Sustainability Appraisal (2024) states that ROF Featherstone performs very well, is one of the District’s strategic employment sites and as the site was already factored into the supply/demand balance in the EDNA update 2024 it is proposed for re-allocation in the emerging plan.



Upon allocating the ROF Featherstone site, both the Core Strategy and SAD Inspectors noted in their reports that access into the site was the key constraint to its delivery. A review of the potential access options to deliver ROF Featherstone was reviewed in 2017 (Staffordshire County Council Stage 1 Options Assessment Report), there were 9 options assessed and only 2 were considered potentially suitable (Options 7 and 9). Option 7 (through the Cross Green site) was ultimately preferred as Option 9 would impact on heritage assets to the south of ROF Featherstone. Although it has been some time since the study was undertaken, the heritage constraints still apply and therefore Option 7 through the Cross Green site is still the most suitable and only deliverable option.

The access arrangements and permitted access for ROF Featherstone were linked to both the allocation of the Cross Green land for housing and transfer of land to the east of the railway line (also owned by Taylor Wimpey) as part of a wider arrangement. Therefore, the removal of the draft Cross Green allocation means the arrangements between Taylor Wimpey and St Francis Group (landowner of ROF Featherstone) are considerably impacted. TW and StF remain in communication however at present without an arrangement that allows for access to ROF Featherstone, the ability to deliver the approved access to ROF Featherstone is at risk.

SSDC's removal of the draft Cross Green allocation and the evidence base to support the revised plan, make no reference on the ROF Featherstone access being taken through the Cross Green site and the potential implications on the delivery of ROF Featherstone without the access through the Cross Green site. Table I.3.1. of the Sustainability Appraisal (2024) states that "there are no showstoppers precluding the site from development". Appendix A of the Infrastructure Delivery Plan (2024) also makes no reference to the Cross Green site and just states that the ROF Featherstone access road is a baseline infrastructure project and assesses the road as amber meaning "feasibility work ongoing/completed and/or infrastructure identified through current/emerging Local Plan". The NPPF (paragraph 86c) is clear that planning policies should seek to address potential barriers to investment such as inadequate infrastructure. The draft plan is not meeting this requirement.

Taylor Wimpey support the re-allocation of ROF Featherstone as a strategic employment site where the draft allocation on Land at Cross Green is also included to deliver the highways infrastructure and homes to serve the jobs being created. The provision of land to deliver the access to a strategic employment priority site as part of the Cross Green allocation is considered to be sufficient exceptional circumstances needed to justify removal of this land from the Green Belt.

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.

Land at Cross Green (site references 646a and 646b) should be re-allocated in order to deliver the access road between A449 and ROF Featherstone.



**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 oral evidence and engage in the Examination discussions on this matter.

**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