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Local Plans
South Staffordshire Council
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Dear Sir/Madam

REPRESENTATIONS ON BEHALF OF ST FRANCIS GROUP TO SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW PREFERRED OPTIONS SEPTEMBER 2021

We are instructed by St Francis Group (SFG) to make representations to the Council's Local Plan Review Preferred Options document. The main issue which SFG wishes to comment on in relation to the proposed Local Plan Review arises from SFG's role as joint landowner and applicant on the former Royal Ordnance Factory site at Featherstone. A planning application for the development of the former brownfield allocated site in the Core Strategy (repeated in the draft Local Plan Review) was resolved to be granted by the Council in July 2021. This allows up to circa 159,000 sq.m. of mixed employment floorspace to be developed on the 36 hectare site allocated within the Core Strategy and Site Allocations Document (SAD). The officer report to committee on that application noted that the proposals were in accordance with the Local Plan policy (both Core Strategy and SAD) to deliver the ROF site for employment as one of the most important strategic employment sites in South Staffordshire.

For the purposes of the specific questions which are identified in the draft Local Plan Review document, SFG's comments relating particularly to question 3a – ie the need to ensure strategic objective 6 is delivered; question 5 – expressing general support for the spatial strategy on employment development of free standing strategic employment sites emphasising the need to deliver development providing a range and choice of B2/B8 development in addition to the West Midlands Interchange allocation.

In this regard, SFG welcome the continued policy support in the Local Plan Review for the development of the ROF site (reflecting that the resolution to grant planning permission which will shortly be formalised through the signature of a legal agreement). Thus, SFG supports that element of draft Policy DS3 – the spatial strategy for the district – that reaffirms the importance of the identified strategic sites (including ROF) for employment purposes originating from the Core Strategy and the SAD.

SFG also supports the specific identification of the ROF site in table 5.12 of the Local Plan Review. SFG notes that the total land allocated to be delivered for employment purposes up to 2038 in the draft Local Plan Review from table 5.12 is 340 hectares. Around two thirds of this overall provision is intended to come forward on the new allocation proposed in the Local Plan Review at West Midlands Interchange (WMI). Given the reliance proportionately on the WMI site to deliver employment land provision in South Staffordshire in the Local Plan Review, it is important in SFG's view to ensure that the delivery of the strategic employment sites (including ROF) takes place as a priority to ensure a range and choice of deliverable employment land for the market outside the WMI site. It is also important in SFG's opinion for the Council to take account, where possible, of employment land market trends in the post pandemic period.



In this regard, given the time lag that would inevitably take place between the proposed allocation of the WMI site and its delivery of employment land to occupiers, it is important for the ROF site to continue to be supported as one of the strategic employment sites. This is because since the resolution to grant planning permission in July 2021, SFG has received significant interest from occupiers who wish to take up employment buildings (particularly B2 and B8) on the ROF site. This interest has developed to the point where SFG has now committed to make a reserved matters submission (for the whole site) pursuant to the planning permission that is anticipated to be issued shortly that will convert the outline application into a scheme that will comply with the parameters approved by the Council but deliver buildings designed to a scale and layout to meet specific end user requirements. This will – taking account of the determination period of the reserved matters applications and the construction period – lead to the delivery of new jobs on the site from 2023 onwards. At the time of making these representations SFG anticipates that a reserved matters application will be made Q1 of 2022 and will identify between six and nine new buildings across the site as a whole – a significant number of which would be built to meet specific occupier/end user requirements. Thus, the delivery of the ROF site can be anticipated in its entirety by approximately 2025.

In these circumstances there is clear merit in the retention of the ROF site as a strategic site as part of the Spatial Strategy in the Plan and then also the retention of it in the list of employment allocations within table 5.12. All of the 36 hectares designated for employment on the ROF site can be anticipated to come forward within about three years, ie the early years of the Local Plan period.

The Council's policies for ROF in the Local Plan Review are therefore supported by SFG and can be delivered in the short term. In this regard, we have attached with this letter a summary of the answers to the relevant questions to these representations that are referred to in the Local Plan Review.

Yours faithfully



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CarneySweeney

