

South Staffordshire Local Plan

Matters, Issues and Questions Response – Savills on behalf Indurent Strategic Land Ltd and J&M Holt (11-04-25)

(Please note that Regulation 19 representation were made on behalf of St Modwen Strategic Land Limited and J&M Holt. St. Modwen Strategic Land Limited has now become Indurent Strategic Land Limited)

Matter 3: Vision and Strategic Objectives

Issue 1 – Whether the Vision and Strategic Objectives for South Staffordshire are justified, effective, consistent with national policy and positively prepared.

Please find attached the representations made by Indurent Strategic Land Ltd (herein Indurent) and J&M Holt at Regulation 19 stage relating to Local Plan Chapter 4 – Vision and Strategic Objectives.

Question 1 – Is the Vision of the Plan for South Staffordshire ambitious, and yet realistic in terms of its scope and deliverability?

We do not consider the Vision and Strategic Objectives for South Staffordshire to be justified or effective in light of the proposed employment need set out, and we object on this basis.

Strategic Objective 6 'Building a strong local economy' set out in Table 6 of the Publication Plan 2024 is supported. The objective states SSDC will '*develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, encouraging inward investment and job creation in key sectors such as advanced manufacturing and providing the skills to enable residents to access these jobs*' [Savills Emphasis].

However, to deliver Objective 6, it is important that the employment evidence base provides a true representation of the future requirements of the area and does not under-forecast the requirements resulting in local plan policies which constrain supply. Although the 2024 Publication Plan allocates more employment (around 8.75 hectares additional) than the 2022 Publication Plan, this is not considered to be sufficient to meet the actual demand. Savills' demand estimates are significantly higher than the 2022 and 2024 EDNA estimates and so there is still a clear shortfall in Industrial and Logistics sites being allocated. Paragraph 1.2.4 of Savills' Industrial and Logistics (I&L) Needs Assessment – Addendum Note (attached below) concludes that there is a shortfall of between 15 and 63 ha. This is detailed in our representations to Matter 4.

While the additional allocation of Junction 13, M6 Stafford (E30) will assist in achieving this objective and is strongly supported, it is not considered that the Local Plan allocations as a whole and Policy DS4 'Development Needs' will fully deliver the vision and strategic objectives set out. Further employment land is required within SSDC to achieve a aims set out in the Local Plan.

Question 2 – Is the plan period justified?

It is noted that if the Local Plan is adopted in 2026 it will provide the minimum 15 years required by the NPPF. Additionally, in accordance with paragraph 234 and 236 of the NPPF (Dec 2024), SSDC is required to commence work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need. As such it is considered that the plan period is justified.

Question 3 – Are the scope and thrust of the Strategic Objectives of the Plan sufficiently reflected in the proposed policies and site allocations so that the Vision may be realised through their implementation?

Please see our response to question 1.

Question 4 – Are the objectives of the Plan clearly set out and are these measurable?

The objectives of the Plan are clearly set out. However, further allocated employment land is required to meet Strategic Objective 6 'Building a strong local economy'.

Regulation 19 Representations

3. To which part of the Local Plan does this representation relate?

Paragraph	Chapter 4 – Vision and Strategic Objectives	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.

Strategic Objective 6 'Building a strong local economy' set out in Table 6 of the Publication Plan 2024 is **supported**. The objective states SSDC will '*develop an economic strategy that seeks to retain existing employment and fosters sustainable economic growth, **encouraging inward investment and job creation in key sectors** such as advanced manufacturing and providing the skills **to enable residents to access these jobs***' [Savills Emphasis].

The additional allocation of Junction 13, M6 Stafford (E30) will assist in achieving this objective and is **strongly supported**. Figure 10.1 of the Savills Industrial and Logistics Needs Assessment (February 2024) (Appendix 1) presents the economic benefits expected to be generated from the Proposed Development. 90 on-site (gross) construction jobs are expected to be generated per annum over the estimated 50 year construction period and 880 on-site jobs (gross) are expected

to be generated by the proposed development. In terms of operational jobs, it is estimated that 420 on-site and off-site jobs are expected to be generated for South Staffordshire residents. St. Modwen is also committed to the implementation of a comprehensive employment and skills plan to further bolster the economic benefits of the development.

As set out in our representations to Chapter 3, it is important that the employment evidence base provides a true representation of the future requirements of the area and does not under-forecast the requirements resulting in local plan policies which constrain supply. Although the 2024 Publication Plan allocates more employment (around 8.75 hectares additional) than the 2022 Publication Plan, this is not considered to be sufficient to meet the actual demand. Savills' demand estimates are significantly higher than the 2022 and 2024 EDNA estimates and so there is still a clear shortfall in Industrial and Logistics sites being allocated. Paragraph 1.2.4 of Savills' Industrial and Logistics (I&L) Needs Assessment – Addendum Note (Appendix 2) concludes that there is a shortfall of between 15 and 63 ha.

(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.

No modifications required.

(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)?

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No, I do not wish to participate in hearing session(s)

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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.