

South Staffordshire Local Plan Examination

Respondent No: AGT 24-030-01-03

Position Statement by Nurton Developments Ltd

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.

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?

1. No. This is with particular reference to Strategic Objectives 2 and 6 as they relate to economic strategy and the employment needs of the district.
2. Strategic Objective 2 refers to meeting the employment needs of the district whilst making a proportionate contribution towards the unmet needs of the wider FEMA. The wider FEMA principally takes in the Black Country but includes also Cannock Chase. Strategic Objective 6 refers to fostering sustainable economic growth and encouraging inward investment and job creation in key industrial sectors.
3. The response of the plan to these objectives is the allocation of just one new employment site – 17.6ha at Dunston, Junction 13, M6. This site is located at the very northern end of the district and whilst it will serve the local employment market of Stafford it will not serve the local market of South Staffordshire and the wider sub-region of the Black Country.
4. The draft plan justifies its strategy by reference to a claimed supply (107.45ha) being greater than the assessed local need (62.4ha), with the surplus (45.2ha) being said to be sufficient for the purposes of contributing to the unmet needs of the Black Country. These figures are wholly unreliable based upon NDL's analysis. Properly assessed, there is in fact a substantial shortfall between local need and supply (i.e. a minimum shortfall of 86.6ha). This analysis is set out in detail in its Position Statement on Matter 4.
5. In addition, NDL has also identified a greater unmet need for the Black Country, following the publication of an update to the Black Country EDNA in November 2024 as part of the evidence base to the draft Wolverhampton Local Plan (Regulation 19). This increases the shortfall in unmet need from 153ha to 280ha. For reasons set out in its Position Statement for Matter 4, NDL considers this to be a minimum figure.

6. NDL has also expressed concern through the consultation process (and in its related Position Statements to this examination) that the clear recommendations of two versions of the West Midlands Strategic Employment Sites Study (Avison Young, 2021 and Icen, 2024) have been ignored without justification. Those reports provide the clearest possible evidence that there is a need for the local plan to identify and allocate additional large sites (greater than 25ha) to meet a specific need for large floorspace industrial and logistics users within the South Staffordshire and Black Country FEMA. This is also covered in more detail by NDL's Position Statement for Matter 4.
7. For these reasons, the relevant proposed policies and new site allocation will not realise the stated objectives of the Plan as set out above.
8. As a consequence, the Plan will fail the relevant requirements and tests set out by the NPPF (of December 2023) and PPG, as follows:-
 - Paragraph 8 – Economic Objective – ensuring that sufficient land of the right type is available in the right places to support growth, innovation and improved productivity.
 - Paragraph 11- meeting the development needs of its area and providing for objectively assessed needs for employment land as well as any needs that cannot be met within neighbouring areas.
 - Paragraph 23 – strategic policies providing a clear strategy for bringing forward land at a sufficient rate to address objectively assessed need over the plan period.
 - Paragraph 35 – plans being positively prepared and providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and accommodating unmet need from neighbouring areas where it is practical to do so.
 - Paragraph 86 – meeting anticipated employment needs over the plan period, the plan to be flexible enough to accommodate needs not anticipated, and to enable a rapid response to changes in economic circumstances.
 - Paragraph 87 – addressing specific locational requirement of different employment sectors, including expressly for storage and distribution operations at a variety of scales and in suitably accessible locations.
 - Paragraph 29 of the PPG – identifying and closing gaps in the market.

9. The draft Plan, through not properly assessing the extent of employment land need and then making allocations of appropriate and realistic sites for employment, manifestly does not pass these tests. To rectify this, the need for employment land has to be addressed by making further allocations in addition to one site in a peripheral location. There needs to be a wholesale reassessment of the plan's employment land requirement, both quantitatively and qualitatively, and new sites identified and allocated, mindful of the need to distribute such sites to meet market demands.

PJL

10 April 2025