

South Staffordshire Local Plan Examination

Respondent No: AGT 24-030-01-03

Position Statement by Nurton Developments Ltd

Matter 5: Spatial Strategy

Issue 1: Whether there is a clear Spatial Strategy which is justified, effective and consistent with national Policy?

1. NDL holds a number of serious concerns about the Plan's approach to the economy and employment land and the reliability of the associated evidence base. In summary, these concerns relate to:-
 - The assessment of local employment land need and supply.
 - The contribution that committed or allocated land in South Staffordshire will make to meet the unmet needs of the Black Country.
 - How the Plan fails to respond to, an identified need for new strategic sites for the M54/M6 corridor in the Black Country and South Staffordshire.
2. These concerns are set out principally in NDL's Position Statement to Matter 4: Development Needs. It is NDL's conclusion that a wholesale review of employment land need, both quantitatively and qualitatively, is necessary to rectify matters and plan positively, and that the plan cannot be found sound until this additional work has been done.
3. A particular further concern is the lack of any proper attempt to meaningfully respond to proposed changes to the Strategic Road Network (SRN) arising out of proposed improvements to the M54/M6 Link Road in the Plan. Neither Section 4 (Vision and Strategic Objectives) nor Section 5 (Development Strategy) make reference at all to this proposed link road.
4. In addition, the Sustainability Appraisal ('SA') inexplicably makes no reference to it at all, either in its analysis of employment growth options or its appraisals of employment distribution options. This is an obvious omission given that the link road has been long in preparation. The SA therefore fails to assess reasonable alternatives that would be well placed to take advantage to the improvement in the SRN within the district.
5. This key element of national important infrastructure received a Development Consent Order from the Secretary of State in April 2022. Preparatory works were undertaken in Q4 2024 with construction scheduled to be completed by 2030. Once built, the link road will greatly improve road communications for the district and the wider sub-region.
6. The West Midlands Strategic Employment Sites Study (May 2021) draws specific reference to the link road (in paragraph 5.13). Its improvement is described as an opportunity that could unlock development potential for strategic employment sites, and yet it is essentially ignored in the local plan.

7. Its omission is symptomatic of the Council's overall approach to employment land provision. It has sought to downplay the need and demand for land and any external influence which will help to attract investment to the district and the wider sub-region.
8. This conflicts with the requirements set out in the NPPF for development plans to be positively prepared and to align growth and infrastructure (Paragraph 11b). As such, it is manifestly unsound.
9. Any reassessment of the employment land needs for the district should consider how advantage can best be taken of this planned infrastructure. This includes the reassessment of development land, such as that being promoted by NDL at Hilton Park, Junction 11 M6, that relates particularly well to the link road. This is considered in more detail in NDL's Position Statement to Matter 7: Site Allocations.

PJL

10 April 2025