

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 Ltd.)

Matter 5: Spatial Strategy

Issue 1 – Whether there is a clear Spatial Strategy which is justified, effective and consistent with national policy.

Please find attached the representations made by Indurent Strategic Land Ltd. (herein ‘Indurent’) and J&M Holt at Regulation 19 stage relating to Policy DS5 ‘The Spatial Strategy to 2041’.

Question 3 – In terms of the distribution of housing and employment development across the plan area:

a. Is it clear how and why the preferred Spatial Strategy has been selected?

We object to Policy DS5 ‘The Spatial Strategy to 2039’ as written, as it is currently not considered to be justified (NPPF paragraph 35 (b)).

Policy DS5 sets out a settlement hierarchy for South Staffordshire, which seeks to locate employment development within the Tier 1-3 settlements. The policy also seeks to restrict development in rural areas outside of the District’s existing settlements. However, it is noted that the policy supports further development at the freestanding strategic employment sites within the District (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone / Brinsford, Four Ashes and M6 Junction 13, Dunston).

We fully support the recognition of the proposed allocation (E30) at Junction 13 of the M6, which is consistent with our earlier representations that sought further employment allocations to meet employment demand.

However, in order to be effective and justified, we consider the further flexibility within the Plan is required to ensure that it is capable of adapting to increased demand for employment land within the District and the FEMA.

As set out in our previous representations to Policy DS3, Policy DS5 should also be amended to enable sufficient flexibility to deliver additional employment sites at appropriate locations, to address the needs of SSDC and the wider FEMA. This would be consistent with paragraph 86 (e) of the NPPF which states that policies should be ‘*flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices...and to enable a rapid response to changes in economic circumstances*’ [Savills Emphasis].

We therefore **object** to Policy DS5 ‘The Spatial Strategy to 2039’ as written, while we do not raise any issues with the current policy text, we do request the inclusion of additional text as set out below which enables ‘windfall’ employment sites to come forward in suitable locations:

Other Employment Locations

Where evidence indicates an immediate need or demand for additional employment land (Use Classes E(g), B2 and B8) that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations outside of the district’s settlements and freestanding strategic employment sites. Such development should be delivered in accordance with the requirements of other policies within the local plan.

b. What options have been considered for accommodating the identified development requirements in a sustainable manner? Have reasonable alternatives been considered?

Reasonable alternative sites have been considered through the Sustainability Appraisal. However, it is considered that the inclusion of a windfall policy for employment sites is required to help ensure an appropriate supply of employment sites can identified within South Staffordshire.

c. Are the areas identified for new development the most appropriate locations? Is the rationale behind choices and reasoning for conclusions clear and justified by the evidence? How have the locational needs of different sectors been addressed.

The areas identified for new employment development are considered to be the most appropriate locations, including land at J13 of the M6 (E30).

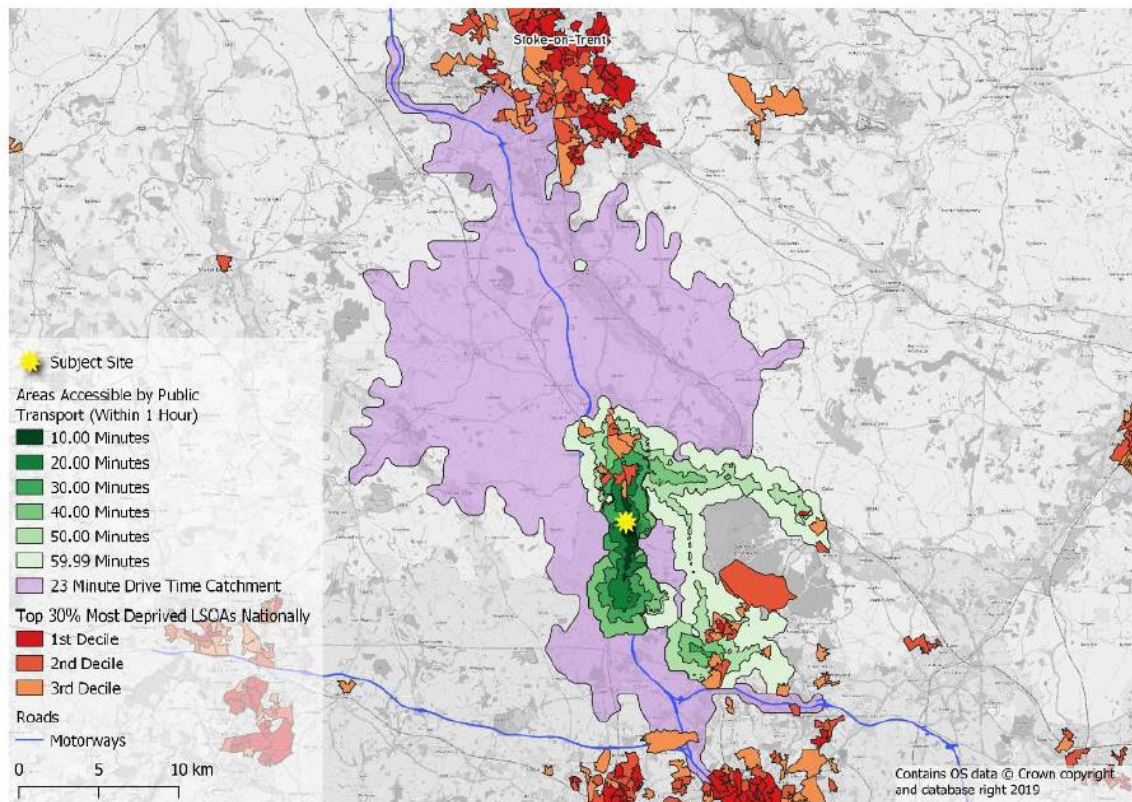
Paragraph 6.46 of the Local Plan highlights the locational advantages of the proposed strategic employment site at M6 Junction 13, Dunston (ref. E30). The site's non-Green Belt nature and location adjacent to the motorway network are noted. We would add to this that site E30 is the only remaining opportunity to allocate a new strategic employment site in the district that is not within the Green Belt and also appropriately located in terms of the strategic highway network.

The site is also well located in terms of access to a large labour pool. Within a 23 minute drive time, which is the average home-to-work time for South Staffordshire (ONS User Request Data – 2018) there is a catchment of approximately 136,000 working-age people (aged 16-64). This represents a high level of workforce accessibility for future operators of the site.

The delivery of the site will also have a positive role to play in improving the employment prospects of deprived communities, with the logistics sector being particularly good at providing opportunities for those who may not otherwise be in work. Based on a recent independent survey undertaken by YouGov, Frontier-Economics found that 20% of people currently in logistics were previously unemployed, and that one in four within this group were long-term unemployed (Frontier Economics (2022) The Impact of Logistics Sites in the UK).

In terms of the E30 site specifically, Figure 1 below illustrates the areas accessible by public transport within an hour of the Subject Site during weekday mornings (07:00-09:00). The reachable areas within the hour journey time are broken down into 10 minute intervals (green shading) for reference. Figure 1 also presents the 23-minute drive time catchment referred to above, which is considered within commuting distance. This shows that within the areas accessible by public transport, and the 23 minute drive time catchment from the site, there are numerous neighbourhoods that score among the top 30% most deprived areas in England. This means that the Proposed Development will increase the employment opportunities available to the residents of these highly deprived neighbourhoods.

Figure 1 – Areas of Deprivation within Areas Accessible by Public Transport within an Hour of the Subject Site, and 23 Minute Drive Time Catchment



Source: IMS 2019, Savills 2023

The West Midlands Strategic Employment Sites Study 2024 (WMSESS) identifies the E30 location as one of only 2no. top scoring sites within the M6 Stoke and Stafford corridor (identified as area 1). The WMSESS confirms that Area 1 is 'a strong market sitting equidistant between Manchester & Birmingham on the M6 corridor and is well established in the big box market. The market has seen significant amount of take up on sites in recent years and there is currently a scarcity of pipeline sites in the market.' (paragraph 12.26). The delivery of site E30 would make a significant contribute to address this scarcity in the pipeline.

Indurent has submitted an outline planning application (ref. 23/01080/OUTMEI) for industrial and logistics development, which is with SSDC for determination and entails the entirety of the E30 allocation area. The determination of the planning application is at a progressed stage, with the only remaining outstanding issues relating to National Highways' sign-off of active travel measures to Stafford and securing agreement of the assessed surface water outfall location with the LLFA. Indurent is working proactively with SSDC, SCC and National Highways to resolve these few remaining issues and through further technical work.

It is therefore maintained that site E30 is clearly justified by not only SSDC's employment evidence base (EB42 Economic Strategy and Employment Site Assessment Topic Paper April 2024) but also the extensive work that has been carried out by Indurent as part of the current planning application.

d. What roles have the Sustainability Appraisal (SA) and Viability Study had in influencing the Spatial Strategy?

The Regulation 19 SA of the South Staffordshire Local Plan (March 2024) considered site E30 as part of the reasonable alternative sites assessment (listed in Table G1.1 of EB2b Sustainability Appraisal of the South Staffordshire Local Plan Review (2023-2041). Of those tested, site E30 is identified as the most appropriate for allocation and as such is included as a selected employment site (section I.3). This approach is welcomed.

Question 4 – In terms of highways considerations:

- a. **How have the traffic impacts of the Plan on both the local and wider highway network been assessed?**
- b. **How have the traffic assessment findings shaped the plan proposals for the scale and distribution of development within the plan period?**
- c. **How have the cumulative highway effects of the Plan on neighbouring authorities, including Wolverhampton been considered and addressed?**
- d. **Are there any outstanding concerns from National Highways or Local Highway Authorities? If so, what are they and should they be addressed prior to adoption of the Plan?**

As part of the current outline planning application for employment development at M6 Junction 13 (ref. E30), Indurent has prepared an Environmental Impact Assessment (EIA) and Transport Assessment (TA). As part of the TA consideration has been given to the traffic impacts of the proposed development, including cumulative impacts of other development sites on the local and wider highway network. In advance of and following the application submission, discussions have been held with National Highways and Staffordshire County Council to agree the scope of assessment.

As a result, the potential development trip impacts have been considered at both local junctions and several M6 Junctions (11-14) within the South Staffordshire, Stafford and Walsall authority areas. Detailed design and assessment work, including a road safety audit, has been carried out to demonstrate that the proposed new vehicular access onto the A449 and the works proposed to junction 13 (inclusion of light controlled pedestrian crossings to enable improved active travel routes to the site) are appropriate for the proposed scheme.

It is highlighted that National Highways confirmed to Indurent on 8th April 2025 that based on the highways modelling work carried out by Indurent's transport consultants, the proposed works would not have a detrimental effect to the safety and operation of the Strategic Road Network, and that all junction arms have spare capacity.

Furthermore, detailed capacity assessments have been undertaken of M6 Junction 13 - within the traffic flows assessed, cumulative development sites have been accounted for as follows:

- Development of 1,129 dwellings on Land at A449, Penkridge – Policy SA4 within the South Staffordshire Local Plan Preferred Options (traffic flow information set out within the Strategic Transport Assessment which supported the previous Local Plan Reg 19 publication version);
- Development of 200 dwellings on Land North of Penkridge (Phase 1) - 17/01022/OUT (included within the Land at A449, Penkridge Strategic Transport Assessment);
- Development of 88 dwellings on Land at Cherry Brook – Site Allocation 005 within South Staffordshire Local Plan Preferred Options;
- Development of West Midlands Interchange (WMI) – as per DCO consent;
- Cumulative Development associated with other proposed Local Plan site allocations, (included within the Land at A449, Penkridge Strategic Transport Assessment):
 1. 1,200 dwellings at Cross Green;
 2. 1,200 dwellings at Linthouse Lane;
 3. 1,165 dwellings at Bilbrook and Codsall.
- M54/M6 Link Road (included within the Land at A449, Penkridge Strategic Transport Assessment).

It is recognised that a number of the committed development sites included in the assessment are no longer proposed as strategic sites, or have lower development quantum. As a result, the assessment undertaken for site E30 is considered to overestimate trip rates and is therefore a robust assessment of potential impacts on the local highways network

It is understood that a cumulative impact assessment is being undertaken by SWECO, on behalf of SSDC. The purpose of this assessment is to consider the impact of the proposed site allocations on the local and wider highway network, to overcome outstanding concerns from National Highways in relation to the Local Plan.

Regulation 19 Consultation Responses

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

Paragraph	<div></div>	Policy	Policy DS5 – The Spatial Strategy to 2041	Policies Map	<div></div>
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<div><input checked="" type="checkbox"/></div>	No	<div></div>
(2) Sound	Yes	<div></div>	No	<div><input checked="" type="checkbox"/></div>
(3) Complies with the Duty to co-operate	Yes	<div></div>	No	<div><input checked="" type="checkbox"/></div>

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.

We **object** to Policy DS5 'The Spatial Strategy to 2039' as written, as it is currently not considered to be justified (NPPF paragraph 35 (b)). While we do not raise any issues with the current policy text, we do request the inclusion of additional text, as set out below.

Policy DS5 sets out a settlement hierarchy for South Staffordshire, which seeks to locate employment development within in the Tier 1-3 settlements. The policy also seeks to restrict development in rural areas outside of the districts existing settlements. However, it is noted that the policy supports further development at the freestanding strategic employment sites within the District (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone / Brinsford, Four Ashes and M6 Junction 13, Dunston).

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(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.

It is requested that the following additional text be included in Policy DS5, following the section relating to 'free standing strategic employment sites':

Other Employment Locations

Where evidence indicates an immediate need or demand for additional employment land (B1, B2 and B8) that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations outside of the district's settlements and freestanding strategic employment sites. Such development should be delivered in accordance with the requirements of other policies within the local plan.

(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.