

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 7: Site Allocations

Issue 1 – Site Allocations.

Please find attached the representations made by Indurent Strategic Land Ltd. (herein ‘Indurent’) and J&M Holt at Regulation 19 stage relating to Paragraphs 6.43-6.44 and SA5.

Question 1 – In terms of the distribution of housing and employment development across the plan area:

- a. **Is the spatial distribution of the allocations across the South Staffordshire area justified and is it consistent with the Spatial Strategy?**

We object to the explanatory text supporting Policy SA5 as it is not considered justified or appropriately evidenced.

Paragraph 6.43 of the Local Plan states that *‘the level of employment sites and premises requirement to meet South Staffordshire requirements over the plan period was calculated in the Council’s Economic Development Needs Assessment (EDNA) update 2024, which identified an objectively assessed need for employment land for South Staffordshire over the period 2023-2041 of 62.4ha’.*

Paragraph 6.46 refers to the M6 Junction 13 site (E30) and states that *‘whilst this site is not needed to increase the district’s supply of employment land to meet our own objectively assessed needs for employment land (62.4ha), allocating this site ensures plan flexibility and ensures a very healthy pipeline of sites in the district.’*

For the reasons described in detail in our representations to Matter 4, we do not consider that the identified objectively assessed need for employment land for South Staffordshire is sufficient to meet South Staffordshire’s needs as well as provide surplus available to contribute towards cross boundary unmet needs.

The objectively assessed need for employment land for South Staffordshire over the period 2023-2041 should be reviewed and uplifted, taking into considerations the analysis contained within the Savills Industrial and Logistics (I&L) Needs Assessment – Addendum Note (May 2024) and the Savills Industrial and Logistics Needs Assessment (February 2024).

We support the inclusion of site E30 within the employment sites allocated within Policy SA5. The inclusion of an additional employment site in a non-green belt location is considered to accord with the Spatial Strategy and is required to address the true employment need for the District. As set out in our responses to Matter 4 and 5, in order to be effective and justified, we consider that 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 such paragraph 6.46 should be removed from the Local Plan.

Our previous representations also stressed that Policy DS5 should also be amended to enable sufficient flexibility to deliver additional employment sites as windfalls at appropriate locations, to address the needs of SSDC and the wider FEMA. This would be consistent with paragraph 86 (d) 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].

- b. Has the identification and selection of the proposed site allocations been robustly evidenced and subject to robust, consistent and transparent methodologies, including in relation to the approach to existing committed sites?**

The approach taken is considered appropriate and robust. The Regulation 19 Sustainability Appraisal (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).

- c. Is the methodology for assessing the heritage impacts of site allocations robust and are the site-specific requirements for each site allocation consistent with it?**

We have no specific comment to make.

- d. What evidence is there that education provision can be secured in a sustainable manner to support each of the housing allocations?**

We have no specific comment to make.

- e. Is the approach of the Plan to air quality matters relating to planned growth sound?**

The Local Plan's Habitat Regulations Assessment 2024 (EB8) concludes that the South Staffordshire Local Plan, submission version, is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects on European site integrity, alone or in-combination with other plans or projects, can be drawn. In light of this it is considered that the allocation of site E30 for employment development has been appropriately assessed in air quality terms, and found acceptable.

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 application considers both air quality in the immediate area and also, through a Shadow Habitat Regulations Assessment (sHRA), the potential for air quality impacts on Cannock Chase SAC. This work has identified that the overall operational air quality effects of the proposed development are judged to be 'not significant'. This conclusion is based on the concentrations at existing receptors being well below the objectives and impacts all being negligible.

- f. For any site allocations with a known flood risk, how has that been considered, both in terms of assessing the capacity of the site and any measures necessary to manage the issue? Will the measures be effective and are they consistently applied across the relevant proposed allocations in the Plan?**

We have no specific comment to make.

- g. The Council has set the requirements for each site allocation within appendix B. Is that approach effective? Are the key requirements for each site allocation justified and sufficiently clear?**

It is noted that development requirements for housing allocations are set out in Appendix C and employment allocations in Appendix E. It is considered that the requirements set out in Appendix E for the employment sites are appropriate and not overly prescriptive.

h. Do the proposed allocations have a reasonable prospect of meeting the other relevant policies of the development plan? What evidence of this exists?

While producing the outline planning application for Allocation E30, Indurent tested the proposed development against the policies in the adopted Local Plan and the emerging Local Plan. The proposed development at j13 of the M6 does accord with the emerging development plan as a whole.

Issue 3 – Whether the preferred employment sites are justified, effective and consistent with national policy.

Question 1 – Are the allocations for employment development underpinned by a robust evidence base that reflects existing business needs?

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

Allocation E30 is being promoted by Indurent, who is a leading developer and manager of industrial and logistics spaces across the UK, with a large portfolio of sites. Subject to securing planning permission, Indurent will bring forward the site and retain management. The allocation of site E30 is therefore supported by the industrial and logistics industry and reflects Indurent's extensive knowledge of the sector and existing business needs.

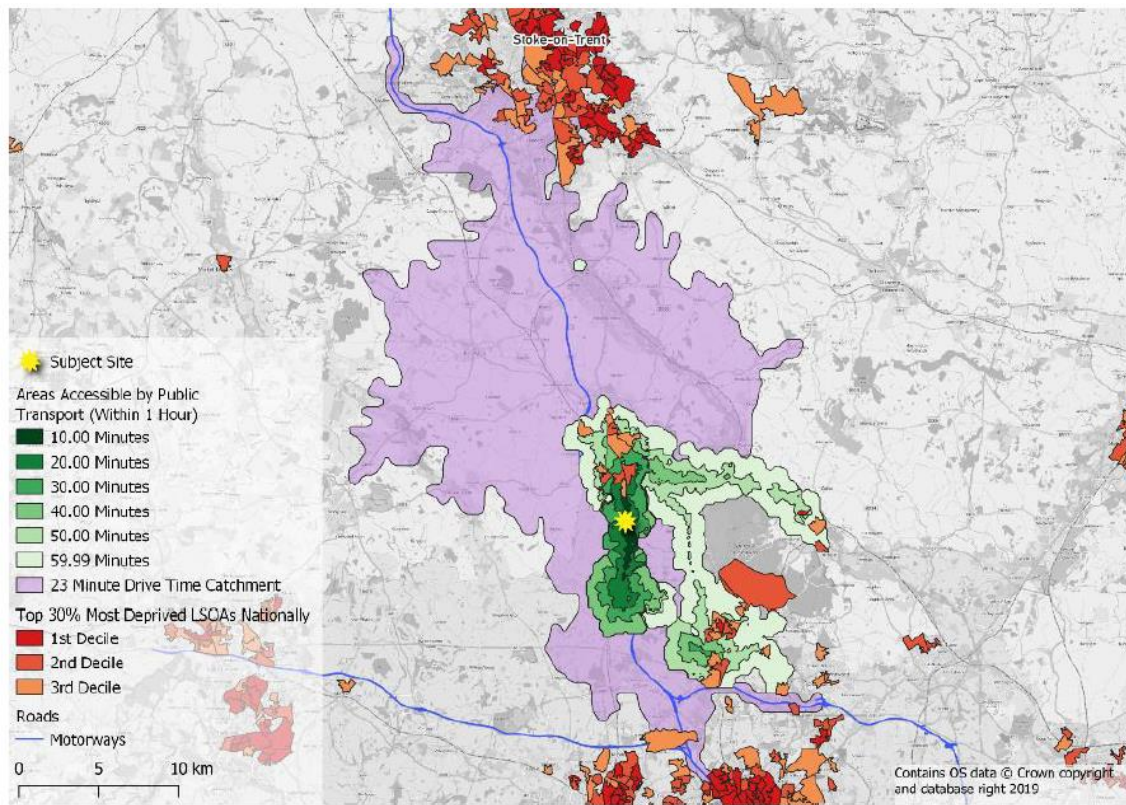
The accompanying Industrial and Logistics Needs Assessment (Savills February 2024) and Addendum Notes May 2024 and April 2025, prepared to support the allocation, concludes that in light of the current and future industrial and logistics market, site E30 is required to ensure that the District's portfolio of employment land can meet the need identified for SSDC and also the wider Black Country area.

Allocation E30 is 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.

Question 2 – How were different sites considered for inclusion as employment allocations?

- a. What process did the Council follow in deciding which sites to allocate?
- b. How did the Council consider the viability and deliverability of sites in deciding where to allocate development?

It is noted that between the initial Regulation 19 consultation (December 2022) and the second Regulation 19 consultation (May 2024) a review of the employment allocations was undertaken by SSDC and site E30 was added as a proposed allocation. As set out above it is maintained that this site is required to address the employment needs of South Staffordshire specifically.

Question 3 – Are the employment site allocations identified as gross or net hectares?

The employment site sizes identified in policy SA5 are gross hectares. Indurent's outline planning application in relation to site E30 seeks permission for up to 60,851sqm (655,000 sqft). This is considered to make best use of the site, while also ensuring sufficient space is provided for green infrastructure, sustainable drainage features and a screened buffer to Dunston village.

Question 4 – Have site specific key requirements for each employment allocation been considered and identified within the Plan?

It is considered that the site requirements set out in Appendix E for the employment sites are appropriate and not overly prescriptive.

Question 5 – Are any modifications necessary for reasons of soundness?

No specific modifications are considered necessary for Policy SA5, in terms of the proposed allocation of E30. However, policy DS5 should be amended as set in our response to question 1a) to enable sufficient flexibility to deliver additional 'windfall' employment sites at appropriate locations.

Regulation 19 Consultation Representations

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

Paragraph	<div style="border: 1px solid black; padding: 2px;">6.43 - 6.44</div>	Policy	<div style="border: 1px solid black; width: 100px; height: 30px;"></div>	Policies Map	<div style="border: 1px solid black; width: 150px; height: 30px;"></div>
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<div style="border: 1px solid black; padding: 2px; text-align: center;">☑</div>	No	<div style="border: 1px solid black; width: 80px; height: 30px;"></div>
(2) Sound	Yes	<div style="border: 1px solid black; width: 80px; height: 30px;"></div>	No	<div style="border: 1px solid black; padding: 2px; text-align: center;">☑</div>
(3) Complies with the Duty to co-operate	Yes	<div style="border: 1px solid black; width: 80px; height: 30px;"></div>	No	<div style="border: 1px solid black; padding: 2px; text-align: center;">☑</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.

Paragraph 6.43 states that *'the level of employment sites and premises requirement to meet South Staffordshire requirements over the plan period was calculated in the Council's Economic Development Needs Assessment (EDNA) update 2024, which identified an objectively assessed need for employment land for South Staffordshire over the period 2023-2041 of 62.4ha'*.

For the reasons described elsewhere within our representations, we do not consider that the identified objectively assessed need for employment land for South Staffordshire is sufficient **'to meet South Staffordshire's needs as well as provide surplus available to contribute towards cross boundary unmet needs'** [Savills Emphasis].

(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.

The objectively assessed need for employment land for South Staffordshire over the period 2023-2041 should be reviewed and uplifted, taking into considerations the analysis contained within the Savills Industrial and Logistics (I&L) Needs Assessment – Addendum Note (May 2024) (Appendix 2) and the Savills Industrial and Logistics Needs Assessment (February 2024) (Appendix 1).

(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)?

☐

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

☒

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.

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

Paragraph	<input type="text"/>	Policy	SA5 – Employment Allocations	Policies Map	<input type="text"/>
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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.

We **strongly support** M6 Junction 13, Dunston (E30) being included as a draft employment allocation in the Publication Plan. The Site is a non-Green Belt strategic employment opportunity located on Junction 13 of the M6. A Planning Application for Outline Planning Permission was submitted to SSDC in December 2023 (reference 23/01080/OUTMEI) which demonstrates the site's deliverability. Subject to approval of the outline planning permission and subsequent reserved matters, the site is capable to delivering employment floorspace in the short term.

Various technical work has been undertaken which supports the Site's deliverability and the current planning application, which confirms that there are no substantive technical issues which cannot be appropriately mitigated. The development proposes to deliver up to circa 60,851sqm (655,000 sqft) of industrial and logistics floorspace together with substantial areas of landscaping and public open space. The proposed development will also provide a significant number of key benefits for the local community and wider district. These comprise the following:

- Provision of much needed Industrial & Logistics floorspace to serve South Staffordshire's needs;
- Education and Training Opportunities;
- Public transport connectivity and active travel improvements;
- BREEAM Excellent development;

- Potential community open space in the southern part of site and potential links with the primary school. Discussions are progressing in relation to the delivery of an off-road school drop off parking area. This is subject to further detailed design work;
- Biodiversity Net Gain in excess of 10%;
- Access to areas of open space, nature and permissive paths / a new bridleway;
- Improvement in the health of the wider community associated with increased work opportunities and training;
- Reducing the levels of worklessness and benefits dependency by developing skills and better employment opportunities for the local area, which includes some areas of significant deprivation (40% or less most deprived areas);
- Increasing the proportion of higher skilled, higher paid jobs in the local economy and raising skill levels;
- Providing a range of new employment sites and facilities to attract inward investment;
- Optimising the opportunity of locating I&L adjacent to the M6 motorway and the strategic road network through the region;
- The key non-Green-Belt Location with good access to the strategic road network in South Staffordshire; and
- Contributing to the reversal of out commuting to the employment opportunities in other local authorities.
- Delivery of a comprehensive employment and skills plan

The development of the junction 13 Site for employment uses is considered to represent a sustainable proposal with significant economic, environmental and social benefits. The allocation is **strongly supported**.

(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)

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