

Development Plan Representations

South Staffordshire Local Plan

Preferred Options

On behalf of J Holt & Sons

December 2021



I. Introduction

- I.1. Spawforths have been instructed by J Holt & Sons to submit representations to the South Staffordshire Preferred Options Local Plan.
- I.2. We welcome the opportunity to contribute to the emerging South Staffordshire Local Plan as we are keen to ensure that the strategic employment needs of South Staffordshire, the Black Country and the wider West Midlands Region are considered as a whole.
- I.3. J Holt & Sons has significant land interests within South Staffordshire, which can positively contribute towards the economic growth agenda, providing a long term comprehensive approach to meeting the strategic employment needs of South Staffordshire, the Black Country and the West Midlands.
- I.4. Within this Representation, we make comments on the following topics and sections of the South Staffordshire Local Plan and associated evidence base:
- **The South Staffordshire Local Plan**
 - Question 1 - Economic Development Needs Assessment
 - Question 1 - Evidence Base Duty To Cooperate and Sustainability Appraisal
 - Question 3 - Objectives – Vision and objectives
 - Question 4 - Policy DS2
 - Question 5 - Spatial Strategy DS3
 - Question 10 - Employment sites and SA7
 - Omission Site: Site E30 Land at Junction 13 of the M6 Motorway
- I.5. In each case, observations are set out with reference to the provisions of the National Planning Policy Framework (the 2021 Framework) and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- I.6. J Holt & Sons and Spawforths welcome the opportunity for further engagement with the plan-making authority and the opportunity to appear at Local Plan Examination in Public.
- I.7. We trust that you will confirm that these representations are duly made and will give due consideration to these comments.

- 1.8. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2. National Planning Policy Context and Tests of Soundness

- 2.1. The Government's core objectives as established through the 2021 National Planning Policy Framework (the 2021 Framework) are sustainable development and growth. Paragraph 11 of the 2021 Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2021 Framework sets out to boost significantly the supply of homes and to ensure that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2021 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2021 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes and well-designed places.
- 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the 2021 Framework state that Local Plans are the key to delivering sustainable development which reflect the vision and aspirations of the local community. The 2021 Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. Paragraph 22 is clear that Strategic Policies should look ahead over a minimum 15 year period, and where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the areas strategy, then policies should look ahead over a period of at least 30 years.
- 2.3. In relation to the examination of Local Plans, paragraph 35 of the 2021 Framework sets out the tests of soundness and establishes that the Local Plan and spatial development strategies should be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant

- 2.4. This document therefore considers the content of the South Staffordshire Local Plan Document on behalf of J Holt & Sons in light of this planning policy context.

3. Question 1 - Evidence Base

- 3.1. J Holt & Sons has significant concerns with the Evidence Base in relation to the need and supply of Employment Land. J Holt and Sons agree with the Council that it is imperative to review the requirements for employment land established in the Economic Development Needs Assessment to ensure that it does not underestimate the requirement for employment land and that it reflects the significant structural changes to the economy.

Test of Soundness

- 3.2. J Holt & Sons considers that the Local Plan is **unsound**.

| Which test of soundness are comments about? | | | |
|---|---------------------|---|----------------------------------|
| X | Positively Prepared | X | Effective |
| X | Justified | X | Consistency with National Policy |

Justification

Economic Development Needs Assessment.

- 3.3. J Holt & Sons are concerned that the EDNA Stage 1, does not reflect the full potential for the growth in demand for industrial and logistics land. J Holt & Sons note that the Council are commencing a review of the EDNA with regards to the requirements. J Holt & Sons are supportive of the need to review EDNA Stage 1 and consider that there will be a consequential need to update EDNA Stage 2 when balancing the supply against demand to ensure that there are sufficient sites to ensure choice and enable the market to operate effectively. In order to provide context for our concerns with the EDNA and the need for review, a brief overview of national policy and policy drivers, as well as an update on market demand is provided below.

National Context

- 3.4. The economic objective of the 2021 Framework seeks to ensure that sufficient land of the right type is available in the right places at the right time to support growth, innovation and improved productivity. Paragraph 81 of the 2021 Framework seeks to ensure that policies and

decisions create the right conditions in which businesses can invest, expand and adapt. The 2021 Framework considers that an area should build on its strengths, counter any weaknesses and address the challenges of the future. Paragraph 82 of the 2021 Framework requires authorities to seek to address barriers to investment, and identify strategic sites to meet anticipated needs over the Plan period for local and inward investment. Furthermore the 2021 Framework confirms that the specific locational requirements of different sectors should be recognised and addressed by policies and decisions. This includes making provision for “storage and distribution operations at a variety of scales and in suitably accessible locations”, as well as provision of clusters or networks of knowledge and data-driven, creative or high technology industries.

- 3.5. The 2021 Framework is supported by the PPG which is clear that economic assessments should be based on evidence of market demand and wider market signals relating to economic growth. With specific regard to logistics, the PPG states that logistics play a critical role in enabling the sustainable and effective supply of goods, as well as contributing to local employment opportunities. Further it notes that the sector has distinct locational requirements that need to be considered in formulating planning policies. It considers that such facilities, where they serve national or regional markets, are likely to require significant amounts of land, have good access to strategic transport networks, along with sufficient power capacity and access to an appropriately skilled labour market.
- 3.6. PPG seeks to ensure that where there is a need for logistics, authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market area. The PPG indicates that this assessment can be informed by engagement with logistics developers and occupiers; analysis of market signals; analysis of forecasts; and engagement with the Local Enterprise Partnerships. Furthermore, the PPG requires authorities to assess the quantum of land required to support all forms of logistics including the needs of SMEs and for ‘last mile’ facilities.
- 3.7. The PPG also addresses the assessment of need/requirements for specialist or new sectors. It highlights the need to understand whether there are specific requirements in the local market which affect the types of land or premises needed. It notes that ‘clustering’ can be important for certain industries, such as high tech, engineering, digital, creative and logistics, to enable collaboration, innovation, productivity and sustainability, as well as *‘driving economic prospects of the areas in which they locate’*. The PPG confirms that there must be a clear

understanding of these needs and how they can be addressed, noting that these needs can be qualitative and require engagement with businesses and occupiers within the relevant sectors.

- 3.8. The UK Industrial Strategy (November 2017) promotes Local Industrial Strategies to meet local economic needs and priorities. It identifies the need to build on the strengths of the economy for longer term growth with shorter term benefits. It stresses the importance of logistics and manufacturing in positioning the UK at the forefront in the world economy. The Industrial Strategy establishes Grand Challenges to put the UK at the forefront of industry. The Grand Challenges, as updated in January 2021 not only expand upon the earlier Grand Challenges but also develop ambitious missions to tackle the Challenges. The first 4 of the Grand Challenges are focused on Global trends which are set to transform the future. These include Artificial Intelligence (AI) and data; ageing society; clean growth; future of mobility. The UK Government aims to lead the world in development, manufacture and use of low carbon technology.
- 3.9. The UK Research and Development Roadmap 2020 (updated in 2021) is clear that Research and Development is critical to economic and social recovery from the impacts of the Covid-19 Pandemic. Beyond Covid, the Roadmap notes that the greatest challenge is to decarbonise economies and build resilience to the impact of climate change, habitat loss and biodiversity. The Roadmap establishes a commitment to increasing investment in Research and Investment. Importantly, the Roadmap reiterates the Government's commitment to the levelling up agenda, and indicates that the evolving Place strategy will set out how the Government will invest in research and innovation in places around the UK to support economic recovery by protecting and backing the most promising research and development clusters. The Government commits to working with devolved administrations, businesses, academics, universities, and local leaders on how they can ensure that more parts of the UK are attractive to private investment in order to unlock their full potential for R&D growth. The Roadmap states that this might include "support for on shoring and learning from the experiences of existing localised initiatives".
- 3.10. The budget in March 2021 was supported by the publication of Build Back Better, which reaffirmed the Government's commitment to levelling up. Build Back Better highlights the commitment to £100 billion investment in infrastructure and £12 billion in funding through the Plan for a Green Industrial Revolution.

- 3.11. Build Back Better also considers that skills and innovation will be key to the economic growth of the UK. The UK Innovation Strategy published in July 2021, highlights the Strength in Place fund; intercity transport settlements for eight city regions including the West Midlands; and £22.6 million to the Advanced Machinery and Productivity Initiative to drive innovation for the UK's Advanced Machinery manufacturers.
- 3.12. The OECD called for low carbon responses to Covid-19 through investment in low carbon infrastructure, renewable energy infrastructure, and rethinking public transport. The 2020 Spending Review increased the size of the Carbon Capture Infrastructure Fund. The UK Government has also announced £240 million for the low carbon hydrogen fund, supporting up to 8,000 jobs in the UK. The Build Back Better 'our plan for growth' (March 2021) prioritised Levelling up, strengthening the Union through the creation of Freeports, as well as supporting the transition to Net Zero. This has been followed more recently with the publication of the Industrial Decarbonisation Strategy, which sets out the Government's vision for a prosperous, low carbon UK industrial sector, providing certainty for investment in decarbonisation. The Black Country is identified as one of seven strategic industrial clusters across the UK being supported by BEIS and Innovate UK to decarbonise by 2040.
- 3.13. The UK is currently in the midst of a global pandemic which saw the UK enter into recession in Q2 of 2020 but with subsequent recovery in Q3. Covid-19 has not affected all markets in the same way. This is particularly the case for those sectors that align with Government Initiatives and are critical to the economic recovery of the UK. Several industry reports show that market activity has returned post lockdown and that the outlook for the industrial and logistics sector is positive. Prologis have stated that they expect to see a boost to logistics real estate with demand resulting from inventory levels and e-commerce. Further they note that the source demand for most logistics real estate users has not changed, and that many items that supply chains are tied to, relate to basic daily needs such as food, beverages, consumer products and medical supplies. There are increasingly high service level expectations and higher barriers to new supply with suppliers seeking to increase their inventory levels to ensure business continuity. This is combined with further trends showing continued e-commerce adoption all of which serve to drive demand for logistics real estate.

- 3.14. Montagu Evans¹ has also charted the rise of e-commerce, noting online sales accounted for 18% of sales in 2018, but that this is predicted to rise to 28% by 2024. This is combined with a move away from a 'Just in Time' model, an increase in urban logistics and last mile deliveries, and a move for some occupiers to bring back manufacturing onshore, for business resilience and sustainability goals. They conclude that the demand for industrial and logistics space is increasing and is set to increase at a quicker pace. These views are echoed in JLL's research report Covid-19 Global Real Estate implications, where they consider that Covid-19 will lead to businesses reevaluating their supply chains to ensure they can mitigate risk and ensure resilience. JLL indicate that this could lead to reshoring supply chains, and increasing inventory.
- 3.15. In January 2021, JLL Big Box logistics market update highlighted that occupier take-up in 2020 recorded the highest total take-up in history, with take up in 2020 being 64% up on 2019 and 43% higher than the five year annual average. Furthermore they note that despite the uncertainties surrounding the Covid-19 Pandemic and Brexit, they anticipate another year of strong demand in 2021. The JLL Logistics Market update, August 2021 confirmed these predictions, highlighting that the market's strong momentum continued into the first half of the year (H1). It confirmed that take up in H1 2021 was 58% higher than the five year half yearly average. Retailers accounting for 67% of take up, with e-commerce sustaining its position as a key driver of demand accounting for 51% of take up. Significantly it noted low vacancy rates of 6%, excluding space under construction, the vacancy rate was just 3%. **JLL note that occupational demand is being underpinned by a range of solid long term drivers, and therefore anticipate an ongoing elevated demand.** Savills midyear report aligns with the position reported by JLL. Savills reported that 24.41 million sq. ft. of warehouse space had been transacted, setting a new Half 1 (H1) take up record. Take up from manufacturers has also been rising in H1, with 15% of take up from manufacturers. Whilst demand is remaining high, supply has dropped to some of its lowest levels.
- 3.16. This notable uplift in demand has been driven by **a large increase in online shopping since the start of the pandemic.** ONS Internet sales as a percentage of total retail sales (ratio) (%) demonstrates the growth in e-commerce. E-commerce has been growing year on year, with online sales representing 7.3% of total sales in September 2010 rising steadily to 18.1% in September 2019. However, this growth accelerated in 2020 in response to Covid-19 with

¹ Montagu Evans, Briefing Note 'What Impact has Covid 19 had on the Industrial and Logistics Sector?' <http://insights.montagu-evans.co.uk/post/102g46r/what-impact-has-covid-19-had-on-the-industrial-logistics-sector>

sales forming 32.8 % of total retail sales in May 2020. Although the proportion of online sales fell slightly to 25.5 % in July 2021, they have remained at that level in August 2021. This is significantly above the figures for July 2019 where internet sales represented 18.7% of total sales, and higher than sales in the lead up to Christmas where internet sales represented 21.5% of all sales in November and 21% in December 2019. Despite the slight drop in the proportion of internet related sales following the re-opening of the economy, take up of floorspace has remained high, and e-commerce is expected to remain a driver for growth. It is widely anticipated that internet sales will not return to pre Covid levels.

- 3.17. A consumer attitude survey by RetailX notes that 43.9% of respondents expect to continue shopping as they are now after Covid-19 (RetailX, May 2020). Colliers International considered that **‘The great consumer shift has occurred and will not be reverted. The pandemic has brought forward between six and 10 years of online commerce development in just over one year** (Industrial & Logistics UK Barometer – July 2021²). This position, in terms of the consumer shift in spending, was echoed by a recent report by Barclaycard³.
- 3.18. Interestingly, Colliers, in the 2020 Industrial and Logistics Barometer noted that the sector faced severe challenges with the lack of development land in densely populated areas and increasing pressure to reduce carbon emissions. They surveyed developers, funders and operators in the industrial and logistics sector, 89% of whom stated that the UK market does not have enough last mile stock to fuel growing demand. The latest update highlights that availability of warehouse space is at its lowest level on record.
- 3.19. The impact of Covid-19 and Brexit has not been restricted to logistics. As indicated earlier the UK Industrial Strategy has stressed the importance of manufacturing to the UK economy. Indeed, Make reported that the UK is the 9th largest manufacturer in the world accounting for £192 billion of output in the UK⁴. A number of commentators above have highlighted, in their analysis of industrial and logistics take up, that businesses are reshoring their manufacturing base to support business resilience and sustainability.

² <https://industrial-barometer-july-2021.colliers.com/>

³ Barclaycard. Lockdown Legacies, March 2021.

⁴ <https://www.makeuk.org/insights/publications/uk-manufacturing-the-facts-2019-20>

- 3.20. Whilst the impact of Covid-19 hit some manufacturing sectors hard, such as aerospace and automotive, other sectors experienced growth, particularly in those industries related to health and medical supplies⁵. The ONS noted that 13 manufacturing industries, accounting for 26% of manufacturing output, have experienced growth since February (pre covid-19 pandemic levels). ONS⁶ data reveals that manufacturing had returned to at least 94% of their May 2019 levels in May 2021. The sectors driving growth of manufacturing output from February 2020 levels have been: manufacture of basic pharmaceutical products and pharmaceutical preparations; manufacture of chemical products; manufacture of textiles wearing apparel; manufacture of electrical equipment; manufacture of plastics; and manufacture of machinery and equipment. A decline was noted in the manufacturing of transport equipment which was noted to be due to a decline in the manufacture of motor vehicles, trailers and semi-trailers, due to a microchip shortage. Some commentators are anticipating growth up to 2019 levels by 2021 for automotive and aerospace sectors.
- 3.21. The level of demand for industrial and logistics space is set to maintain momentum, with the Covid pandemic and Brexit accelerating demand and growth of e-commerce, highlighting the need to address supply chain uncertainty. Importantly, JLL⁷ state ***‘What we are seeing now is unlikely to be a temporary blip, because demand appears to be well supported by a range of drivers that are likely to maintain take-up at an elevated level’***. They go on to note that: e-commerce growth will continue, driving demand for a variety of buildings; there are growing requirements for new buildings linked to automation, having implications for locational requirements (including the need for power); the desire to address supply chain effects, through additional capacity for inventory, and the need for reduced lead in times; decarbonisation; logistics companies being in a position to plan strategically for long term growth; and demand from manufacturers, especially those supporting decarbonisation.

Regional Context

- 3.22. West Midlands Combined Authority (WMCA) are seeking to deliver a vision of a more prosperous West Midlands. The Strategic Economic Plan (SEP) focuses on enhancing

⁵<https://www.ons.gov.uk/economy/grossdomesticproductgdp/articles/coronavirusandtheimpactonoutputintheukeconomy/september2020>

<https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/bulletins/businessinsightsandimpactonthেকেconomy/28january2021>

⁶<https://www.ons.gov.uk/economy/grossdomesticproductgdp/articles/coronavirusandtheimpactonoutputintheukeconomy/may2021>

⁷ Big Box Logistics, Logistics Market Update August 2021, Jll

manufacturing excellence. It strives for balanced growth, acceleration of the housing market, a focus on manufacturing, engineering, creative, digital and life science sectors, high quality connectivity, and the growth of UK Central as the strategic priority. This includes Birmingham, Coventry and Wolverhampton, highlighting that the surrounding areas of South Staffordshire, North Worcestershire, and Warwickshire have important complementary offers. The SEP seeks to delivery half a million jobs by 2030, compared to the trend based growth of 168,000 jobs over the same period.

- 3.23. The 2016 SEP sector review identifies ten sectors which are fundamental to the increase of GVA within the region. The transformational sectors include: Advanced Manufacturing; Business, Professional and Financial services; Construction; Digital and Creative; Life Sciences and Social Care; Logistics and Transport Technologies; and Low Carbon and Environmental Technologies. Enabling sectors include: Cultural economy; Public Sector; and Retail.
- 3.24. Midlands Engine: Vision for Growth (2017) sets out the ambition to accelerate productivity growth across the Midlands by 2030, based on connectivity, strategic infrastructure, growth in international trade and investment, innovation and enterprise, and places.
- 3.25. The West Midlands Industrial Strategy (2019) seeks to build on the heritage of the region's manufacturing, research and technology sectors. It highlights that the West Midlands is responsible for 5% of the UK's output, with output growing up to 27% over the past five years. Prior to the Covid -19 pandemic, record numbers of people were in employment, and the lowest numbers of people were out of work. The Strategy seeks to increase productivity across the region. It aims to drive growth and meet the national Grand Challenges. It acknowledges that HS2 will boost the region's connectivity having a transformative effect on the economies and communities of the region, enhanced through the Transforming Cities Fund, which supports the extension of the West Midlands Metro. The strategy highlights the West Midlands sectoral strengths of: low carbon technology, aerospace, logistics/transport technology, metals and materials, life sciences, professional skills, rail, construction, creative, food and drink, automotive and tourism. These strengths have a strong alignment with the Government's priorities for economic recovery. Critically, the Industrial Strategy acknowledges the West Midlands Land Commission findings that concluded that the '**shortfall of land for employment land is at least as pressing as the shortage of land for new homes, and possibly more so**'. This is particularly the case for large scale strategic sites that

can have the greatest net impact on growth and jobs. **There is also a shortage of growth on space, with a significant gap in good quality employment land across the region.**

Subsequently, the West Midlands Strategic Employment Sites Study has been prepared. It is a high level report considering the broad options for locating new Strategic Employment Sites in the region to meet the demand. It reviews existing supply, and the potential need for additional supply. The study concludes that **based on past take up (at 0.4 million sq. m of floor space per annum), and current allocations, there is a maximum of 7.41 years supply of strategic employment sites within the study area.** It concludes that there is an **urgent need for additional sites to be brought forward to provide a deliverable pipeline of sites**, noting substantial lead in times. The take up has been considered over the period 2015-2018. The Study considers that as a minimum, recent levels of demand are likely to be sustained from a market perspective which could increase over and above current levels, given the attraction of the area as a location, the LEP ambitions, and the consequences of the Covid pandemic. The Study recommends the need for further economic forecasts for the area. The Study is clear that there is **an urgent need for employment land, that no sites have been identified within the Black Country, and that there is an expectation that demand will at least be consistent with past trends, if not increase.** It notes the suggested sites within neighbouring areas, **including in South Staffordshire**, and **considers that sites in neighbouring areas, which are well located to the Black Country, could help to meet the shortfall in employment land identified in the Economic Development Needs Assessment.** Significantly, the study carries out a high level assessment of the 47 identified sites. **The J13/M6 site is identified as one of the best performing sites with a score of 12 (10 being the lowest possible score and best fit against the high level assessment criteria), it is in the top 8 of 37 industry identified sites, and top 10 of all sites assessed. It is important to note that this assessment is policy off in relation to Green Belt designations, which affects a number of the promoted (70%) and identified sites. The site at J13/M6 is not within the Green Belt, and should be considered prior to the release of Green Belt sites in order to make progress towards addressing the identified shortfall in strategic sites.**

- 3.26. The growth in e-commerce and the implications in terms of industrial and logistics take up nationally has been highlighted above. Demand however varies across the UK. In terms of the impact of Covid-19 more locally at a West Midlands level, the Savills Big Shed briefing July

2021 highlights that take up has rebounded strongly across the West Midlands wherein HI take up amounted to 3.57 million sq. ft., 77% above the long term HI average. The briefing report notes that demand has previously centred on the manufacturing and automotive sectors, but there is now a rapid increase in take up from other occupiers, confirming that in 2021 47% of activity is from third party logistics, and 30 % from online retailers. Significantly supply has decreased significantly, with a 50% decrease on the available supply from this time last year. **Based on annual average take up there is just 0.9 years' worth of supply available in the region**, only 20% of the available space is Grade A stock.

3.27. Knight Frank's Logistics and Industrial Insight Report, 2021 Mid-Year Review, highlights that take up was 75% higher than the same period last year, and significantly it notes that occupier appetite for spaces remains high. Their findings align with those of Savills, and both conclude that availability is reaching critical levels of shortage, noting that the pipeline supply of speculative development is not sufficient to plug the gap. Occupier demand across the Midlands is similar to that of the West Midlands with 93% of transactions from distribution markets, 30% from e-commerce, 27% from third party logistics, and 36% from distribution. Based on the nature of demand, and the strategic location of the Midlands, Knight Frank indicate that there will be future growth in employment as online retailers and distributors expand their bases.

3.28. In terms of future requirements **the mid box logistics market is noted to have witnessed a resurgence, but it is indicated that supply for this market is limited.** The highest number of requirements have been recorded for units between 100,000 and 239,999 sq. ft. Demand for units between 250,000 and 499,999 sq. ft. and over 500,000 sq. ft. is also noted to be strong, with demand for the latter being stronger than previous years. Knight Frank conclude that the Midlands is set to achieve record levels of take up, but they express caution that **take up in 2022 will be constrained by land availability**, as demand outstrips availability (including units under construction). **Knight Frank consider that the region has huge growth potential over the next few years, across all size ranges in almost all locations, with secondary locations now achieving record prime rents.**

3.29. Whilst the Midlands was hit hard by the pandemic, and recovery was anticipated to be slow, the West Midlands Weekly Economic Impact Monitor for 17th September 2021, indicated that job numbers were back at pre-Covid levels in August, with an employment rate of 74.2%, with a record high level of job vacancies, and unemployment decreasing by 0.8 percentage points

to 5.1%, July 2021. The weekly update also highlighted the findings of MakeUK’s latest survey which indicated that the West Midlands has been the top performer, maintaining manufacturing levels on average in the second half of the pandemic. The update also confirmed that business confidence within the region remained strong.

- 3.30. A recent appeal⁸ has confirmed the critical shortage of employment sites across the Midlands, with the Inspector stating *“The Report confirms that demand has increased notably through the pandemic, where the trend towards increasing use of online ‘e-retail’ for a range of goods and product accelerated. This, coupled with Brexit and associated structural changes to supply chains and the movement of goods, is reported to be driving demand for more storage and distribution space (and generally larger buildings) across the Midlands”*. The accompanying proof of evidence details the significant reduction in vacancy rates and availability across both the West Midlands and East Midlands.

South Staffordshire

- 3.31. The Stoke on Trent and Staffordshire Strategic Economic Plan refresh 2018 has a vision to be a growing economic powerhouse, with an aim of growing the economy by 50%, generating 50,000 new jobs over the next 10 years. It highlights the aim to harness the rapid economic growth of the Midlands Engine and the continued growth of nearby conurbations. The Key sectors are noted as advanced manufacturing – energy, auto-aero, medical technologies, agri-tech, applied materials; digital; the visitor economy; business and professional services; construction; and creative industries. The SEP recognises the need to offer a range of suitable employment sites and industrial/office facilities, and to ensure that the portfolio of sites maximizes the suitability for a range of business types and sectors. Critically the SEP notes that a key challenge is delivering the right volume and mix of sites, with a large proportion of land currently allocated not being genuinely available, due to the need for upfront investment. The M6/WCML Spine is identified as playing a vital role in the connectivity of the area.
- 3.32. The South Staffordshire EDNA confirms that South Staffordshire is not a self-contained economic area, with the economic area consisting of South Staffordshire, Wolverhampton, Dudley, Walsall and Cannock Chase. It confirms that the industrial market is primarily located around the north east of the district, serviced by the M6 and M54 Motorways, highlighting that there are limited areas which have the infrastructure and associated drivers to attract

⁸ APP/K2420/W/21/3274706 and AOO/K2420/W/21/3279939

large scale occupiers. It also notes that there is demand for sites within South Staffordshire, in particular for medium sized premises, but that **there is currently no supply of readily available sites in South Staffordshire**. The EDNA part I assessed that of the 106 hectares of land that was available for employment uses, only one of these sites was over 25 hectares (154, 40 hectare western extension). The EDNA considers future requirements. The Oxford Economic forecasts anticipated a reduction in manufacturing floorspace, and a nominal growth in logistics floorspace of 3.24 hectares, when based on employment growth, and 14 hectares of land for logistics, when based on GVA growth. The analysis of past trends 2013 to 2017/18, prior to Brexit and Covid-19 pandemic indicated an annual average growth in floorspace of 10.35 hectares, although significantly higher take up was achieved in 2014/15 and 2017/18 (23.6 hectares and 32.8 hectares respectively). The EDNA concludes that the need based on past trends, Scenario 1. is circa 67 hectares. J Holt & Sons note that this does not include a margin for choice, nor does it include an allowance for losses. **Recent evidence base reports in other authorities, such as East Riding Employment Land Review, 2020 have applied higher margins for choice, competition and uncertainty (up to 50%)**. This was considered to reflect the uncertainty with regards to the economy and decisions relating to Freeports. Doncaster Local Plan factored in a choice of 25% for Office uses and Strategic Warehousing, and 50% for B1b/c and B2 Uses. **J Holt & Sons therefore consider that it is appropriate to apply a higher margin for choice and flexibility than that which the EDNA currently proposes.**

- 3.33. Scenario 2 of the EDNA identifies a requirement for circa 86 hectares of employment land for the period to 2038. This appears to be based on the past trends completions data, as identified in Scenario 1 with the inclusion of GVA growth, based on the Oxford Economic Forecasts of circa 19 hectares over the period to 2038. **As with Scenario 1, J Holt & Sons are concerned that the past trends and forecasts do not reflect the structural changes in the economy that have been highlighted, nor do they reflect the potential of South Staffordshire.** This approach will not serve to support the needs arising in South Staffordshire or respond to the critical shortage in strategic employment sites that affects the wider Midlands and the Black Country. Furthermore, the Scenario 2 forecasts do not include margins for choice or flexibility, nor do they include an allowance for losses. It is also important to note that when determining the requirement for employment land regard should be given to the suitability and condition of the existing stock and whether there will be a need to replace such stock which is no longer capable of meeting the needs of expanding or new businesses. **J Holt & Sons agree that there is a clear need to review the**

EDNA Part I and requirements for employment land. It is imperative that regard is given to the critical shortage of employment land across the Midlands, and the Black Country, discussed further below, and for the requirement to reflect the significant changes to the economy since the EDNA was prepared.

- 3.34. J Holt & Sons welcome the opportunity to engage further with the Council on the preparation of the EDNA, and reserve the right to comment further on the EDNA when the update is published.
- 3.35. With reference to the Black Country and the role of South Staffordshire in meeting the objectively identified needs arising therein, the Black Country EDNA I, was published following the SEP. This notes a shortage of shovel ready sites, and a particular shortage of large parcels of employment land. Market evidence at the time pointed to 0.6 years of supply based on take up rates at the time. Take up for the period 2001 to 2015/16 was stated to amount to 25 ha per annum, although no detailed data was provided. The EDNA does however acknowledge that the low supply of land would lead to a small annual average take-up.
- 3.36. The Black Country EDNA, Update 2021, notes that the pandemic has driven growth in e-commerce, storage and distribution, with increased demand for logistics space. The EDNA highlights the findings of the Big Box Market Research Paper, Implications on the Black Country, March 2021 by JLL, which noted ‘*a quantum leap*’ in take up during 2020, with take up of big box units up 64% on 2019, and a reduction in the availability of Grade A space.
- 3.37. The Black Country Local Plan recognises that the Black Country is a clearly defined functional economic market area, with strong links to the hinterland, in particular Birmingham and South Staffordshire. It also highlighted that the economy is fast growing and has the capacity to deliver significant growth based on the diversity, resilience and concentration of key sectors in the area supported by major investment, including critical transport infrastructure. The Black Country Local Plan highlights that the economy and population of the Black Country are growing, and that there is a need to plan for economic recovery and growth.
- 3.38. The Local Plan’s explanatory text identifies a need for 565 hectares of employment land based on the EDNA, however it indicates that there will be a shortfall of 210 hectares of land.

- 3.39. The identified need is based on the recommendations within the EDNA 2. J Holt & Sons are concerned that the scale of economic need set out in the EDNA recommendations do not fully reflect the scale of need within the Black Country and have made representations on the Black Country Local Plan. In particular we are concerned that they do not have regard to the key drivers for the growth in demand for industrial and logistics floor space in the Black Country and do not reflect the national, regional and sub-regional ambitions for growth.
- 3.40. J Holt & Sons have expressed concerns that the scenarios for Employment Growth appear to be unduly pessimistic. The EDNA 2 states that the economic forecasts are based on the baseline scenario presented in EDNA 1, and not the Super SEP aspirational economic forecasts. The extensive national and local government interventions, and the significant investment in infrastructure within the Black Country, alongside evidence of take up and demand for industrial land would, in our opinion, justify adopting a ‘policy on’ approach to the forecasts. Such a ‘policy on’ approach would recognise the growth potential of the region rather than rely upon past trends. Furthermore, the forecasts that fed into EDNA 1, are now significantly dated. J Holt & Sons consider that they should be reviewed in light of the updated ‘policy on’ approach. J Holt & Sons are also concerned that the requirements are based on forecasts which include a nominal margin of choice in relation to the econometric forecasts and no margin of choice to forecasts based on past trends or GVA, contrary to best practice. The Black Country EDNA 2 also recognises a degree of uncertainty regarding the long term impact of Covid. As has been highlighted herein, the latest evidence indicates that the growth in demand for industrial and logistics floorspace is unlikely to be a short term blip, with demand being elevated in response to some significant key drivers with e-commerce growth expected to continue. This will drive demand for a variety of buildings, growing requirements for new buildings linked to automation and have implications for locational requirements (including the need for power), and their size. It will also increase the desire to address supply chain effects, through additional capacity for inventory, and the need for reduced lead in times to allow logistics companies to plan strategically for long term growth. The use of a 2 year margin is not considered appropriate, particularly in the context of the structural changes in the economy, and resultant impact on the nature and scale of demand that is likely to arise. Planning for Employment Land: Translating Jobs into Land (Roger Tym and Partners, 2010) recommends that an appropriate margin should equate to 5 year supply of readily available sites (planning permission), however this does not take into account qualitative factors, and hence is difficult to ensure throughout the Plan period at Plan making stage. **Recent evidence base reports in other authorities, such as East Riding Employment Land Review,**

2020 have applied higher margins for choice, competition and uncertainty (up to 50%). Doncaster Local Plan factored in a choice of 25% for Office uses and Strategic Warehousing, and 50% for B1b/c and B2 Uses. J Holt & Sons therefore consider that it is appropriate to apply a higher margin for choice and flexibility than that which the EDNA currently proposes.

- 3.41. Furthermore we also highlighted concerns that the evidence supporting the Black Country Plan underestimating the need for large strategic sites to accommodate big box requirements, and as a result will result in insufficient land of the right type and in the right location to meet the needs, serving to constrain the future growth of the Black Country and wider region. The underestimation of the need for B8 uses is particularly concerning in the context of a lack of supply of strategic sites within the Black Country. The EDNA recognises that there is an immediate need to meet the needs for big box industrial/logistics floorspace, however it confirms that there are no sites above 25 hectares within the Black Country and that there are only 3 sites above 10 hectares, with none of the sites identified being of high quality. The Local Plan and EDNA note that a significant proportion of the identified need will need to be exported to adjacent authorities and hence it is imperative that there is a full understanding and breakdown of future requirements, in order to inform Duty to Cooperate discussions, and to ensure that the quantum of land to be exported reflects the ability of the Black Country to service the identified needs, having regard to the qualitative requirements.
- 3.42. J Holt & Sons maintain that it is essential that the Local Plan is prepared positively, and that it is aspirational. The employment requirements in both the emerging South Staffordshire Plan and the Black Country Plan do not reflect the significant changes in the economy and hence there is a need to revise the Scenarios, to ensure that they are realistic and aspirational to reflect the structural changes in the economy. In both cases **Forecasts based on past demand where a past and sustained shortage in the supply of land, particularly strategic sites, risks building in constraints to future needs. The Plan needs to be flexible to respond to the fundamental shifts in e-commerce, with a shift towards building resilience and reshoring and a move away from “Just in time” models.**
- 3.43. It is therefore fundamental that the evidence base and identified employment need fully reflects the implications of the market demand and the drivers of growth in order that there are sufficient sites for employment land that are capable of meeting the demand for mid and big box industrial and logistics space throughout the Plan period, and in particular on sites that

can be brought forward in the short term to address the imbalance between demand and supply and support the economic growth and recovery of South Staffordshire, the Black Country and the wider region.

3.44. **In summary, we consider that the overall requirements for employment land in both South Staffordshire and the Black Country are an underestimate of both the quantitative and qualitative requirements and do not reflect the drivers of current and future demand. Furthermore, there is a need for an appropriate margin for choice and flexibility, in addition to factoring losses. As a result the amount of land required is under-estimated and hence so too is the amount of land that needs to be exported from the Black Country to authorities such as South Staffordshire.** In J Holt & Sons' representations on the Black Country Plan, we considered that the amount of land to be exported is likely to be higher than that shown in the draft Black Country Plan and EDNA, given the lack of strategic sites within the Black Country.

3.45. J Holt & Sons consider that any employment need that is to be exported should be focused in locations which have a strong functional relationship with the Black Country. The EDNA notes that Birmingham and South Staffordshire have strong economic interactions with the Black Country. **Therefore, South Staffordshire should play a significant role in meeting the needs of the Black Country. J Holt & Sons notes that Birmingham also has unmet needs to be exported and as such South Staffordshire should play the most significant role in meeting unmet needs for the Black Country. This reflects the conclusions of the West Midlands Strategic Sites Study.** The need for employment land arising from both South Staffordshire's own needs and the need to meet unmet needs arising in the Black Country and Greater Birmingham, will result in a higher requirement for employment land. It is critical that sufficient land of the right type in the right location, and that is capable of coming forward within the Plan period, including early phases, is allocated.

EDNA (Part 2)

3.46. As indicated above J Holt & Sons consider that the employment land requirement in EDNA 1, and reflected in EDNA 2, is likely to underestimate the requirement for employment land within South Staffordshire. As a result it will be necessary to review the findings and recommendations of EDNA 2, and where necessary re assess the supply of sites against the identified need for employment land. This should not only consider the overall quantum of

land but also the nature of the requirements, and availability of sites, ensuring that sufficient sites of the right type are available throughout the Plan period. There is a current critical shortage of strategic employment sites, and it is imperative that the need for mid and big box industrial spaces can be addressed in the short, medium and long term. J Holt & Sons therefore reserve the right for further comment on the EDNA 2 following a review of EDNA 1.

- 3.47. Notwithstanding the above J Holt & Sons make the following observations with regards to EDNA 2, which we consider should be addressed through any subsequent review, to inform a review of the Employment Sites Site Assessment Topic Paper and consequently the Submission Local Plan.
- 3.48. Firstly, with specific regard to Site E30, land at Junction 13 of the M6 Motorway, J Holt & Sons are concerned that the score and identification of the Site as Good rather than Best, is not reflective of the available evidence, particularly having regard to the scores ascribed to other sites. J Holt & Sons, note that the assessment proforma, and the Employment Sites Topic Paper, highlight that the Site is eminently suitable for warehouse logistics/distribution uses, and likely to be attractive to the Market, however a score of 2 is provided. This is not reflective of the level of market interest that has been shown in the Site, which has been recently taken to market, and a developer partner will be announced shortly. Revising this score alone to 5 will mean that the Site would have a score of 61 on par with other sites graded as Best.
- 3.49. J Holt & Sons consider that land at Junction 13 of the M6 should be identified to meet the emerging needs. More detail about the Site is provided at the end of this representation which confirms that the Site is available, suitable and achievable. The Site is capable of coming forward in the short term. The scores for Location, Investment and Development Constraints do not appear to be reflective of evidence submitted in relation to overcoming development constraints, in which it has been demonstrated that there are technical solutions to access over the West Coast Main Line and Brook, and that this does not render the scheme unviable. A score of 2 for Location is not reflective of the Site's locational characteristics, which are acknowledged within the proforma and Council's Topic Paper. The score for Impact on Biodiversity does not appear to reflect the potential to deliver biodiversity net gain. The importance of the Site to the SEP and the Core Strategy, does not appear to align with Core Policy 7 which supports storage and distribution uses, and the Sectors and need for employment sites in the SEP. The Site at Junction 13 is suitable for a range of employment uses / sectors, alongside storage and distribution uses which are a key enabling sector

supporting the growth and recovery of the wider economy. Furthermore, it is not clear from Footnote 8 of EDNA 2 whether Sites within the Countryside are being scored on a similar basis as Sites within the Green Belt. Adopting this approach would not be consistent with the provisions of the 2021 Framework. Locations within the Countryside do not have the same level of policy protection as Sites located within the Green Belt. **It is clear that the assessment for Site E30 should be reviewed, and that this review will result in an uplift of the score and the classification of the Site as ‘Best’.**

3.50. J Holt & Sons support the recommendation that further allocations should be focused on Site E30, Junction 13 of the M6, however we consider that in line with the above, the recommendation should be revised to confirm that the Site should be considered a ‘Best’ quality site. Furthermore, the recommendation should be clear that the allocation of sites in a non- Green Belt location should be prioritised over locations in the Green Belt. Site E30 should therefore be prioritised above Green Belt sites such as Site E51a and 51b which are also recommended for priority but which are located within the Green Belt.

3.51. J Holt & Sons note that the EDNA recommends the allocation of site E33, the West Midlands Interchange (WMI). We acknowledge the importance of the WMI site but we consider that the recommendations, and hence the level of employment land shown as available, should reflect the Development Consent Order (DCO) which granted consent for the construction, operation and maintenance of a new Strategic Rail Freight Interchange and associated infrastructure. A significant element of the proposals are for operational rail network connections, areas for intermodal handling and container storage, consistent with the National Policy Statement for National Networks (NPSNN). It is acknowledged that not all buildings are required to be rail connected from the outset, however NPSNN is clear that a significant proportion should be. The DCO provides consent for 743,000 sqm of floorspace, the construction of a rail freight terminal which will comprise a rail freight loading and unloading terminal, terminal gateway office and welfare facilities, storage and workshop building, rail sidings and infrastructure, refuelling and maintenance areas. Under Works no. 3 the construction of rail served warehousing is consented in Zones A1 to A7, alongside ancillary offices and buildings. This area will also include land for container storage, solar energy provision, and landscaping. Significant areas of landscaping and the creation of community parks are also consented through the DCO. Importantly, the DCO requires that the rail terminal works are completed prior to the occupation of no more than 186,000 square meters of warehousing, or the 6th anniversary of the first occupation of more than 47,000 square

meters of warehousing. This will have an impact on the timing and availability of the WMI site and its ability to make a significant contribution to the identified general needs for employment. **As such J Holt & Sons do not consider that it is reasonable or appropriate to conclude that the Site E33 can contribute 297 hectares to the supply of employment land. This is not consistent with the DCO, it is not consistent with the proposals to remove 232 hectares from the Green Belt.** EDNA 2 should reflect the DCO and the quantum of land that could be reasonably available to service general warehousing needs, and the associated timescales for delivery. The DCO should also be reflected in Policy SA7. We acknowledge the WMI site's suitability for meeting rail serviced employment requirements that arise in South Staffordshire, the Black Country and wider West Midlands. Our review of available evidence has however shown that the employment needs within South Staffordshire, the Black Country and wider West Midlands relate to mid box as well as large box requirements. Whilst it is accepted that some of the large box requirements could benefit from the rail linked infrastructure of the WMI, many other occupiers would not require such linkages. J Holt & Sons do not consider that it is appropriate to rely on this single location and the specific WMI characteristics to meet the wider general employment needs arising from the Black Country. The WMI is a regional or sub-regional facility and hence we consider that it is inappropriate to include it as the solution to meeting general employment needs within South Staffordshire. It can help to meet some of the rail enabled requirements arising from the wider Black Country area but it is not the single solution to meeting all the South Staffordshire or Black Country requirements. There is a limited number of Strategic Sites (sites over 25 hectares) that are readily available both within South Staffordshire and the wider Black Country area. The reliance on such a limited supply of strategic sites will undermine the effective operation of the Market.

- 3.52. **Site E30, Land at Junction 13 of the M6, satisfies the requirements for a Strategic Employment Site, it performs highly in the West Midlands Strategic Site Study, and within EDNA 2, the Council's Employment Sites Site Assessment Topic Paper, and Sustainability Appraisal, despite the disputed scoring. The Site at Junction 13 of the M6 Motorway should be allocated for employment uses, either alongside E33 or in its place to meet the general employment needs for mid box and big box logistics. The Site has the potential to come forward in advance of WMI, and to complement the offer, supporting the provision of mid box and big box logistics.**

Proposed Change

3.53. To overcome the objection and address soundness matters, the following changes are proposed:

- Review the EDNA to fully reflect market demand and the key drivers for growth.
- Update the econometric forecasts.
- When determining the need for employment land, ensure that an appropriate margin for choice and flexibility, as well as accounting for losses is built into the identified need for employment land.
- Recommendations should reflect the need for choice in the Market, and the delivery of strategic employment needs should not be reliant on a single site. The recommendations should ensure that there are sufficient sites capable of meeting the needs for a range of strategic employment needs, with sufficient sites capable of coming forward in the short term.
- Provide a breakdown in the need requirement to reflect the need for B2, B8 and office use, in order that supply, both within South Staffordshire and appropriate neighbouring authorities, can be assessed against the nature of demand which reflects the specific locational requirements of different sectors.
- There is a need to review EDNA 2, with specific reference to the updated requirements and the assessment of sites and to review the site specific assessment of Site E30.
- There is a need to ensure choice of sites in order to ensure that the Market can operate effectively.
- Ensure that EDNA 2, and consequently the Local Plan Policy SA7 is fully reflective of the DCO, and its respective conditions.

4. Question 1 – Evidence Base Duty to Cooperate/ Sustainability Appraisal

- 4.1. J Holt & Sons **is concerned** that the evidence base, with particular regard to the Duty to Cooperate, Statement of Common Ground, and the Strategic Employment Needs arising from the Black Country and the wider West Midlands is unsound.

Test of Soundness

- 4.2. J Holt & Sons considers that the Local Plan is **unsound**.

| Which test of soundness are comments about? | | | |
|---|---------------------|---|----------------------------------|
| X | Positively Prepared | X | Effective |
| X | Justified | X | Consistency with National Policy |

Justification

- 4.3. J Holt & Sons **is concerned** that the evidence base which supports the plan appears incomplete. The 2021 Framework requires Local Plans to be based on a sound and up-to-date evidence base which identifies development needs and reflects the locational characteristics relevant within the planning authority area.
- 4.4. As detailed in the preceding section of this representation, there is a significant need for strategic employment sites that are capable of contributing towards the general supply in the short and medium term, as well as over the longer term. Consistent with the provisions of the 2021 Framework, J Holt & Sons consider that addressing the identified shortage of strategic sites a strategic cross boundary issue that should be addressed through collaboration with relevant strategic plan making authorities.
- Duty to Cooperate and Statement of Common Ground.**
- 4.5. Plans are required to be prepared positively, and shaped by proportionate and effective engagement with groups of people, businesses, infrastructure providers, operators and

statutory consultees⁹. The 2021 Framework states that local planning authorities have a duty to cooperate on strategic matters that cross administrative boundaries, the duty is with other authorities and other prescribed bodies¹⁰. The 2021 Framework seeks to ensure that Plan makers collaborate on the relevant strategic matters to be addressed by Plans, and engage with relevant bodies, including infrastructure providers. This joint working should establish what the requirements are and whether development needs can be met within a particular plan area or elsewhere. This engagement should be documented within a Statement of Common Ground confirming the cross boundary matters being addressed and progress in cooperating to address these.

- 4.6. Effective joint working on cross boundary strategy matters is a key test of ‘soundness’. Significantly, the 2021 Framework through promoting such engagement seeks to ensure that cross boundary strategic matters are dealt with and not deferred¹¹.
- 4.7. Consistent with the guidance within the 2021 Framework and the PPG it would therefore be expected that matters relating to the provision of strategic employment sites would be identified as a cross boundary matter subject to duty to cooperate discussions with neighbouring authorities.
- 4.8. J Holt & Sons have had regard to the content of the Duty to Cooperate Statement, and consider, given the shortage of Strategic Employment Sites across the region, that the Duty To Cooperate Topic Paper should also highlight the need to engage with the Greater Birmingham Authorities, to fully consider the ability of South Staffordshire to meet some of the unmet needs for employment land arising from these authorities. These authorities are not listed under paragraph 2.2, however they are identified within Appendix A.
- 4.9. There is a need to clarify the role that the West Midlands Interchange (WMI) can play in meeting unmet needs for general strategic employment needs as opposed to rail enabled needs. We have noted earlier in this representation that there is a difference in site areas referred to within the evidence supporting the Black Country Plan and the South Staffordshire Plan. The quantum of employment land available should be clarified and should be consistent.

⁹ Paragraph 16, NPPF, July 2021

¹⁰ Paragraph 24, NPPF, July 2021

¹¹ Paragraph 35, NPPF, July 2021

4.10. J Holt & Sons welcome the Duty to Cooperate Statement’s acknowledgement of the findings of the West Midlands Strategic Site Study, and we would expect the findings and the implications of the findings to inform the discussions with neighbouring authorities in order to ensure that the lack of supply of Strategic Employment Sites does not constrain the economic growth of the region, and to ensure that all alternative options for meeting the identified needs are explored prior to the release of Green Belt sites.

Sustainability Appraisal

4.11. J Holt & Sons are concerned that it is not clear from the Sustainability Appraisal of the Preferred Options Plan, what reasonable alternatives to the quantum of employment land have been assessed.

4.12. This is critically important, as the 2021 Framework states in paragraph 32 that:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

4.13. Furthermore, PPG states that the Sustainability Appraisal *“needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:*

- *Outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *As part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *Provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives”.*

- 4.14. This therefore explains that the Sustainability Appraisal is an iterative process, which is an ongoing assessment. The Sustainability Appraisal should evolve as the plan making process is undertaken. There should be evidence within the Sustainability Appraisal that policy options and reasonable alternatives have been considered, what the implications are, what mitigation measures could be proposed and what solutions exist. For the South Staffordshire Local Plan Sustainability Appraisal, there does not appear to be an assessment of reasonable alternatives in relation to the quantum of employment land, including how it could play a wider role in meeting the needs arising from elsewhere within the West Midlands, or the provision of reasons for rejecting or not considering these options. J Holt & Sons consider that this evidence should be published, if it has been undertaken.
- 4.15. J Holt & Sons have set out the need to address the provision of Strategic Employment Sites earlier within this representation. J Holt & Sons consider that land at Junction 13 of the M6 Motorway is ideally situated to respond to the identified need for strategic employment land, and the Site is capable of meeting the locational and operational requirements for such uses. The deliverability of the Site is addressed under the section on omission sites. The Site has been assessed in the Council's evidence on Sustainability Appraisal and within the EDNA 2.
- 4.16. With regards to the Sustainability Appraisal's assessment of the Site, whilst Site E30 performs well, relative to some of the other reasonable alternatives, it is not clear that the assessment has taken into account the proposed Site development mitigation measures. For example in relation to climate change Site E30 is ascribed a – score. We consider this to be incorrect as there will be no employment development on land within Flood Zone 2 and 3, and adequate mitigation will be in place to ensure that the risk to flooding of third party land is not increased. In relation to Pollution, a Construction Environmental Management Plan (CEMP) will be put in place to limit the impacts of construction on the environment. The assessment also appears to take a relatively narrow view of Health and Well-being as it does not account for the significant positive impact on well-being resultant from the provision of a range of employment opportunities, nor does the assessment under this objective appear to account for the ability to deliver opportunities for onsite recreation facilities nor active travel measures. In relation to Cultural Heritage, the score ought to be revised to reflect the altered Site boundary, which means that there are no listed buildings within the Site, the - - score should therefore be revised to -, prior to mitigation, and 0 post mitigation (to be confirmed in the findings of a heritage assessment). With regards to transport and access the Site is within 400m of a bus route with a regular service, and the Site masterplan will include adequate connections to the

surrounding footpath and road network. It is therefore unclear why the Site score a – both prior to and post mitigation. J Holt & Sons therefore consider that the assessment should be thoroughly reviewed and the relevant scores increased as set out above.

- 4.17. J Holt & Sons therefore reserves the right to comment further on the Local Plan and policies when this information is provided.

Proposed Change

- 4.18. To overcome the objection and address soundness matters, the Council should:
- Ensure that the Duty to Cooperate discussions are extended to include Greater Birmingham authorities, and provide a strategic response to the findings of the WMSSS, prioritising the release of appropriate sites outside the Green Belt prior to the release of Green Belt sites.
 - Update the Sustainability Appraisal and identify reasonable alternatives in relation to the quantum of employment land.
 - Update the Sustainability Assessment for Site E30.

5. Question 3 - Vision & Objectives

- 5.1. J Holt & Sons **consider** that the Vision should be expanded having regard to the provisions of Policy DS4, and the Objectives should be revised to highlight the importance of the enabling sectors, as set out below.

Test of Soundness

- 5.2. J Holt & Sons considers that the Local Plan is **unsound**.

| Which test of soundness are comments about? | | | |
|---|---------------------|---|----------------------------------|
| X | Positively Prepared | X | Effective |
| X | Justified | X | Consistency with National Policy |

Justification

Vision and Objectives

- 5.3. The Vision is written in a positive way however, consistent with the provisions of the 2021 Framework (paragraph 22) we consider there is a need to update the Vision and Objectives to provide a longer term vision (up to 30 years) for the South Staffordshire area, having regard to the provisions of Policy DS4. This needs to reflect the scale of housing and employment need, economic ambition, infrastructure improvements and investment opportunities. The Vision could therefore provide a longer term framework for meeting the needs of the South Staffordshire including the strategy for meeting those needs arising from outside its boundaries. In this context it needs to fully explore opportunities outside of the Green Belt prior promoting Green Belt release which would fundamentally affect the permanence of Green Belt boundaries in the long term. This approach should be reflected on the Key Diagram.
- 5.4. J Holt & Sons support Objective 6, but consider it should include references to support for enabling sectors such as logistics and distribution. Having regard to the scale of need for employment in the West Midlands, the scale of unmet need in the Black Country, and the

locational advantages of parts of South Staffordshire, particularly along the M6, the Objective should also set out an enhanced role for South Staffordshire in supporting the requirement to meet the unmet employment needs arising in neighbouring authorities.

Proposed Change

5.5. To overcome the objection and address soundness matters, the following changes are proposed:

- **The Plan, it's Vision and Objectives should look ahead to at least 2052**, to reflect the significant development needs for housing and employment, Policy DS4, and the need to look at non Green Belt opportunities before considering Green Belt release. A framework needs to be established to sustainably meet both established needs and emerging economic needs in order to support the economic growth and recovery of the South Staffordshire, Black Country and the West Midlands in the long term.
- Strategic Objective 6 should be expanded to highlight the importance of enabling sectors including logistics and distribution.
- Strategic Objective 6 should be expanded to highlight the role of the South Staffordshire in meeting the unmet employment needs of neighbouring authorities.

6. Question 4 – Policy DS2 Open Countryside.

6.1. J Holt & Sons is **concerned** that the policy is unduly restrictive.

Test of Soundness

6.2. J Holt & Sons is **consider** the Plan is unsound

| Which test of soundness are comments about? | | | |
|---|---------------------|---|----------------------------------|
| X | Positively Prepared | X | Effective |
| X | Justified | X | Consistency with National Policy |

Justification

6.3. J Holt & Sons is concerned that Policy DS2 - Open Countryside is unduly restrictive, and only supportive of development for new or extended buildings where they are related to agriculture, forestry, sports or recreation, affordable housing, represent limited infilling, or redevelopment of previously developed land; or the re use of a building. J Holt & Sons do not consider that this is consistent with the provisions of the 2021 Framework.

6.4. The Local Plan should provide a positive strategy for future land use. The 2021 Framework (paragraph 8) is clear that in order to achieve ‘sustainable development’ there is a need to ensure that there is sufficient land of the right types in the right places and at the right time to support growth, innovation and improved productivity. Strategic policies are required to provide for and meet Objectively Assessed Needs including for employment and housing uses. The 2021 Framework is clear that policies and decisions should help create the conditions in which businesses can invest, expand and adapt, with significant weight being placed on the need to support economic growth, taking into account needs and opportunities for development. The 2021 Framework also requires policies to set out a clear economic vision and strategy, and address barriers to investment. Plans are required to be flexible and ensure that they are capable of being responsive to rapidly changing economic circumstances. It is therefore imperative in order not to constrain the growth of South Staffordshire that

additional flexibility is provided within the Local Plan. There is a significant need for strategic employment land within the West Midlands, and South Staffordshire. Policy DS2 as currently written does not provide sufficient scope for responding positively to applications for such uses. J Holt & Sons consider as a minimum Policy DS2 should be amended to provide a criteria based framework for the consideration of the need for, and delivery of, strategic employment sites, having regard to the need and their locational requirements.

Proposed Change

6.5. To overcome the objection and address soundness matters, the following changes are proposed:

- Either Delete Policy DS2 or amend it to incorporate a criteria based approach to assessing applications for strategic employment land, having regard to locational requirements and need.

7. Question 5 – Policy DS3 the Spatial Strategy

- 7.1. J Holt & Sons is concerned that the Policy DS3 does not provide a flexible framework for securing the provision of employment land.

Test of Soundness

- 7.2. J Holt & Sons is **consider** that the Plan is unsound.

| Which test of soundness are comments about? | | | |
|---|---------------------|---|----------------------------------|
| X | Positively Prepared | X | Effective |
| X | Justified | X | Consistency with National Policy |

Justification

- 7.3. J Holt & Sons is concerned that Policy DS3 does not seek to establish a total requirement for employment land or establish an appropriate framework for the whole Plan period to support the delivery of objectively assessed employment land requirements and any unmet need arising from outside South Staffordshire. Following the review of EDNA 1 and 2, Policy DS3 should be revised to set out clearly the total requirements for employment land over the Plan period.
- 7.4. The Plan should provide a positive strategy for future land use as the 2021 Framework (paragraph 8) is clear that in order to achieve ‘sustainable development’ there is a need to ensure that there is sufficient land of the right types in the right places and at the right time to support economic growth. The 2021 Framework also requires policies to set out a clear economic vision and strategy, and address barriers to investment. Plans are required to be flexible and ensure that they are capable of being responsive to rapidly changing economic circumstances. It is therefore imperative in order not to constrain the growth of South Staffordshire that additional flexibility is provided within the Plan. As a result, J Holt & Sons consider that the section on ‘the districts freestanding strategic sites’ should be revised to provide a clear spatial strategy for meeting strategic employment needs, including unmet needs from outside the authority, focusing on locations to the north of Wolverhampton, with access

to the Strategic Road Network (M6), and Rail Network (West Coast Main Line), that are well connected to the Black Country (via A449) and Birmingham. In addition to supporting existing allocations where these remain deliverable and available for employment, the Policy should provide criteria based policy support for meeting needs for employment that is consistent with the Strategy.

Proposed Change

7.5. To overcome the objection and address soundness matters, the following changes are proposed:

- Amend Policy DS3 to provide a Strategic Framework for delivering employment land and to establish the Employment Land Requirements for the whole Plan period.

8. Question 10 – Employment Sites and Policy SA 7

- 8.1. J Holt & Sons is concerned that the current approach does not provide a flexible framework for securing the provision of employment land, and to ensure sufficient choice of sites. J Holt & Sons is concerned that Policy SA7 does not fully reflect the nature of the DCO for West Midlands Interchange (WMI) and its associated conditions.

Test of Soundness

- 8.2. J Holt & Sons is **consider** that the Plan is unsound.

| Which test of soundness are comments about? | | | |
|---|---------------------|---|----------------------------------|
| X | Positively Prepared | X | Effective |
| X | Justified | X | Consistency with National Policy |

Justification

- 8.3. In Section 3 and 4 J Holt & Sons raised concerns with regards to the evidence base that underpins the identification of employment sites in Table 9. Table 9 includes 232.5 ha of land as available at the West Midlands Interchange (WMI). Policy SA7 goes on to allocate Site E33 for ‘employment development’. The WMI DCO granted consent for the construction, operation and maintenance of a new Strategic Rail Freight Interchange and associated infrastructure at the site. A significant element of the WMI proposals should be for operational rail network connections, areas for intermodal handling and container storage as this is consistent with the National Policy Statement for National Networks (NPSNN). It is acknowledged that not all buildings are required to be rail connected from the outset, however NPSNN is clear that a significant proportion should be. The DCO provides consent for the construction of a rail freight terminal, comprising rail freight loading and unloading terminal, terminal gateway office and welfare facilities, storage and workshop building, rail sidings and infrastructure, refuelling and maintenance areas. Under Works no. 3 the construction of rail served warehousing is consented in Zones A1 to A7, alongside ancillary

offices and buildings. This area will also include land for container storage, solar energy provision, and landscaping. Significant areas of landscaping and the creation of community parks are also consented through the DCO. Importantly, the DCO requires that the rail terminal works are completed prior to the occupation of more than 186,000 square meters of warehousing, or the 6th anniversary of the first occupation of more than 47,000 square meters of warehousing. This will have an impact on the timing and availability of the WMI site to make a significant contribution to the identified general needs for employment. As such J Holt & Sons do not consider that it is reasonable or appropriate to consider that the Site E33 can contribute 232.5 hectares to the supply of employment land, within the Plan period or within the early phases of the Plan period. This is not consistent with the DCO. The DCO and its conditions should be more accurately reflected within policy which infers that the site is allocated for general employment development.

8.4. We acknowledge the WMI site's suitability for meeting rail serviced employment requirements that arise in South Staffordshire, the Black Country and wider West Midlands. Our review of available evidence has however shown that the employment needs within South Staffordshire, the Black Country and wider West Midlands relate to mid box as well as large box requirements. Whilst it is accepted that some of the large box requirements could benefit from the rail linked infrastructure of the WMI, many other occupiers would not require such linkages. J Holt & Sons do not consider that it is appropriate to rely on this single location and the specific WMI characteristics to meet the wider general employment needs arising from the Black Country. The WMI is a regional or sub-regional facility and hence we consider that it is inappropriate to include it as the solution to meeting general employment needs within South Staffordshire. It can help to meet some of the rail enabled requirements arising from the wider Black Country area but it is not the single solution to meeting all the South Staffordshire or Black Country requirements. In the Black Country there is a limited number of Strategic Sites (sites over 25 hectares) that are readily available both within South Staffordshire and the wider Black Country area. The reliance on such a limited supply of strategic sites will undermine the effective operation of the Market.

8.5. Having regard to the need for employment land as identified in Section 3, we consider it is likely to be significantly higher than the scale of need identified in South Staffordshire EDNA, and also the scale of need currently identified within the Black Country. Further we consider that there is a need to provide for choice in the market and hence J Holt & Sons consider that Table 9 and Policy SA7 should be expanded to include the specific allocation of Site 30, Land

at Junction 13 of the M6 Motorway. This Site should be identified as a Strategic Site. The Site as set out in Section 9 of our representations is available, suitable, and achievable. It satisfies the criteria for identifying Strategic Sites; it performs well in the WMSSS, South Staffordshire's EDNA 2, the Sustainability Appraisal, and Site Selection Topic Paper; it lies outside the Green Belt; and it can come forward in the short term to meet the identified demand for mid and big box industrial and logistics floorspace.

Proposed Change

8.6. To overcome the objection and address soundness matters, the following changes are proposed:

- Amend table 9 and SA7 to more accurately reflect the contribution Site E33 can make to employment needs within the Plan Period.
- Amend table 9 and SA7 to allocate Site E30 Land at Junction 13 of the M6 Motorway.

9. Omission Site: Land at Junction 13 of the M6 Motorway.

- 9.1. J Holt & Sons **objects** that the land at Junction 13 of the M6 Motorway is not allocated for Employment Use. J Holt & Sons consider that this Site is eminently suitable, available and achievable, and therefore deliverable in the context of the 2021 Framework and should be included within table 9 and Policy SA7 as an employment site.

Test of Soundness

- 9.2. J Holt & Sons considers that the Local Plan is **unsound** and recommend changes to ensure that it can be made sound.

| Which test of soundness are comments about? | | | |
|---|---------------------|---|----------------------------------|
| X | Positively Prepared | X | Effective |
| X | Justified | X | Consistency with National Policy |

Justification

- 9.3. J Holt & Sons has highlighted **concerns** with the Vision, Objectives, Spatial Strategy, Key Diagram, and the identified needs for strategic employment land to service the needs of Staffordshire, the Black Country and the wider West Midlands.
- 9.4. Within our representations, contained herein, J Holt & Sons has set out concerns that the Plan, as currently presented, does not fully recognise its role in meeting the critical shortage of strategic employment sites within the West Midlands, Black Country and Greater Black Country, as well as ensuring a sufficient supply of sites to meet its own needs across the Plan period. This is contrary to the provisions of the 2021 Framework.
- 9.5. J Holt & Sons **consider that the Plan should play a significant role in addressing the shortage of strategic employment sites in the West Midlands, and consistent with**

the 2021 Framework it should prioritise development on suitable locations outside the Green Belt, where possible.

- 9.6. J Holt & Sons consider the proposed Site is available, suitable, being located outside the Green Belt, and achievable and is therefore, in accordance with the 2021 Framework, a deliverable site able to come forward in the short term. J Holt & Sons **has previously submitted a Vision, itself supported by technical evidence, which demonstrates the deliverability of the proposed scheme.** Further technical work is ongoing and will be submitted in due course. **A summary of the proposals and the technical assessments that have been undertaken on the Site is included below.**

Overview of Proposals

- 9.7. The deliverability and benefits of the Site at Junction 13 of the M6 Motorway are as follows:

Site Context

- 9.8. The Site is located to the south of Stafford, approximately 3.5 miles from the centre of Stafford. The centre of Wolverhampton is located approximately 13 miles to the south of the Site. Stoke on Trent lies circa 19.6 miles to the north and the centre of Birmingham lies approximately 25 miles to the South East.

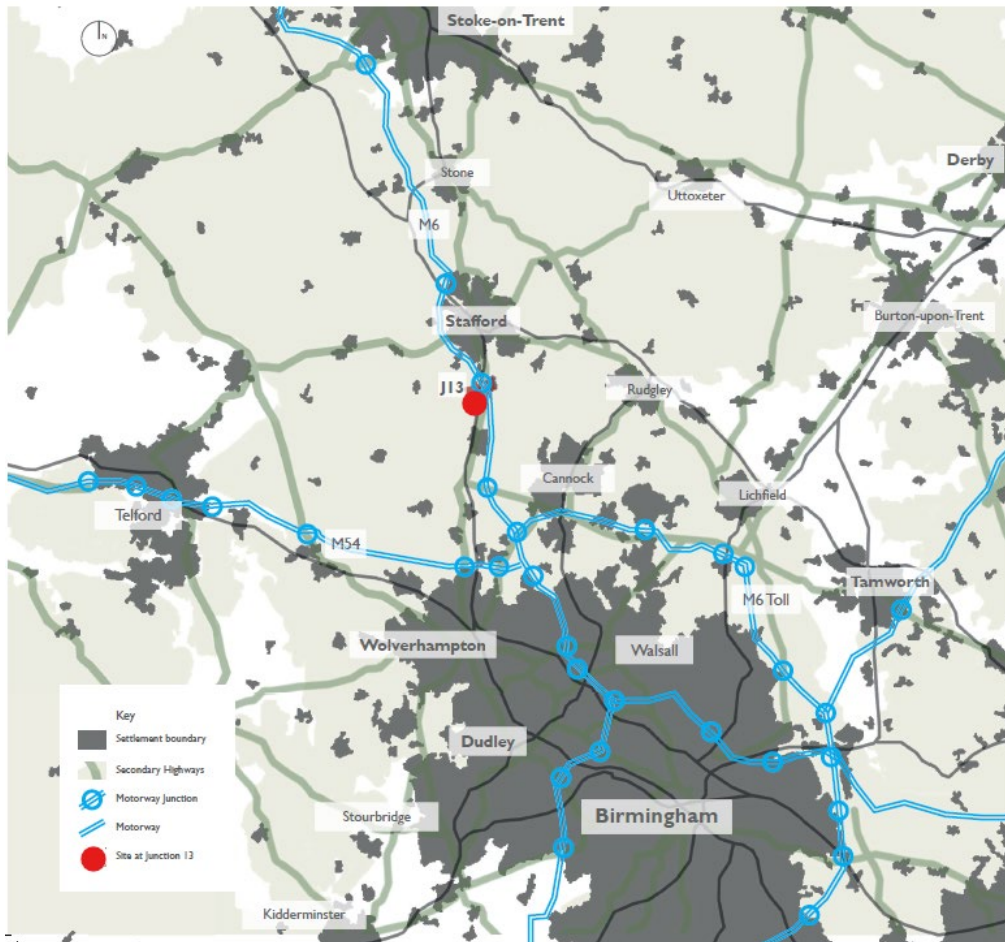


Figure 1: Regional Context Plan

- 9.9. The M6 Motorway corridor runs in a north south direction from the north of Birmingham, and it plays an important role in the connectivity of the Midlands and the North of England.
- 9.10. The Site is located to the south west of the M6 Motorway at Junction 13, within its south western quadrant and it has direct access to Junction 13 via the A449. The M6 provides access to the wider Strategic Road Network, with the M54 being located to the south providing access to the west, and M6 Toll to the east providing connections to Burntwood and Litchfield, prior to joining the M42. The M6 connects the Site to the wider West Midlands conurbation, and to Coventry, as well as joining the M42, M5 and M1 motorways connecting the Midlands to the South.

- 9.11. The A449 provides access to the Site via Junction 13 of the M6 Motorway. It is classified as being part of the Primary Road Network, used for transport on a regional/countrywide level. It provides access to the wider Strategic Road Network, and connects the Site to Stafford, Penkridge, Wolverhampton, the wider Black Country, Kidderminster, Worcester Newport and Wales.
- 9.12. To the north of the Site, in the northern quadrant at Junction 13, is Acton Court, which includes a hub of commercial uses, comprising a Holiday Inn Express Hotel, public house and restaurant, and Acton Gate, including an Argos Distribution Centre. To the south of the Site is the settlement of Dunston. Acton Trussell lies to the east of the M6. To the east of the A449, a range of businesses operate from Dairy Farm, Dunston.
- 9.13. There is a footway along the A449, the Acton Trussell Bednall 2 Public Right of Way, which runs to the south of the Site and which connects the A449 to Acton Trussell. The pedestrian infrastructure connects the proposed Site allocation with the small residential area of Dunston and Acton Trussell, both of which are located within reasonable walking distance of the Site.
- 9.14. Bus stops are located along the A449 to the north of School Lane, adjacent to the Site boundary, with a regular half hourly service operating to Stafford Town Centre and Penkridge, and hourly services operating to Cannock Town Centre and Wolverhampton, other services operating to Rodbaston and Coven. Bus services connect within reasonable walking distance to Stafford Train Station, which has frequent services operating to Birmingham, Wolverhampton, Liverpool, Manchester, Crewe, and London. Penkridge Station is located 4.4 km to the south of the Site, and can be accessed by bus. Regular services operate from Penkridge Station, which include services to Stafford, Birmingham, Wolverhampton, Crewe and Liverpool. The above pedestrian and public transport infrastructure provides an opportunity to undertake journeys to and from the Site by sustainable modes of transport.

Site Description

- 9.15. The Site is circa 75 hectares (186 acres) in total. The Site is in agricultural use. Significantly, the Site lies outside the Green Belt. The Site has good accessibility to the motorway network, located off Junction 13 of the M6 Motorway, and the potential for direct access onto the rail network with the West Coast Main Line dissecting the Site. As shown in Figure 2 below, Parcel A is 17.80 hectares in extent, located to the west of the A449 and is capable of coming forward immediately. To the west of the railway line a further 49.9 hectares of land is available subject to securing access over the railway line (Parcel C).

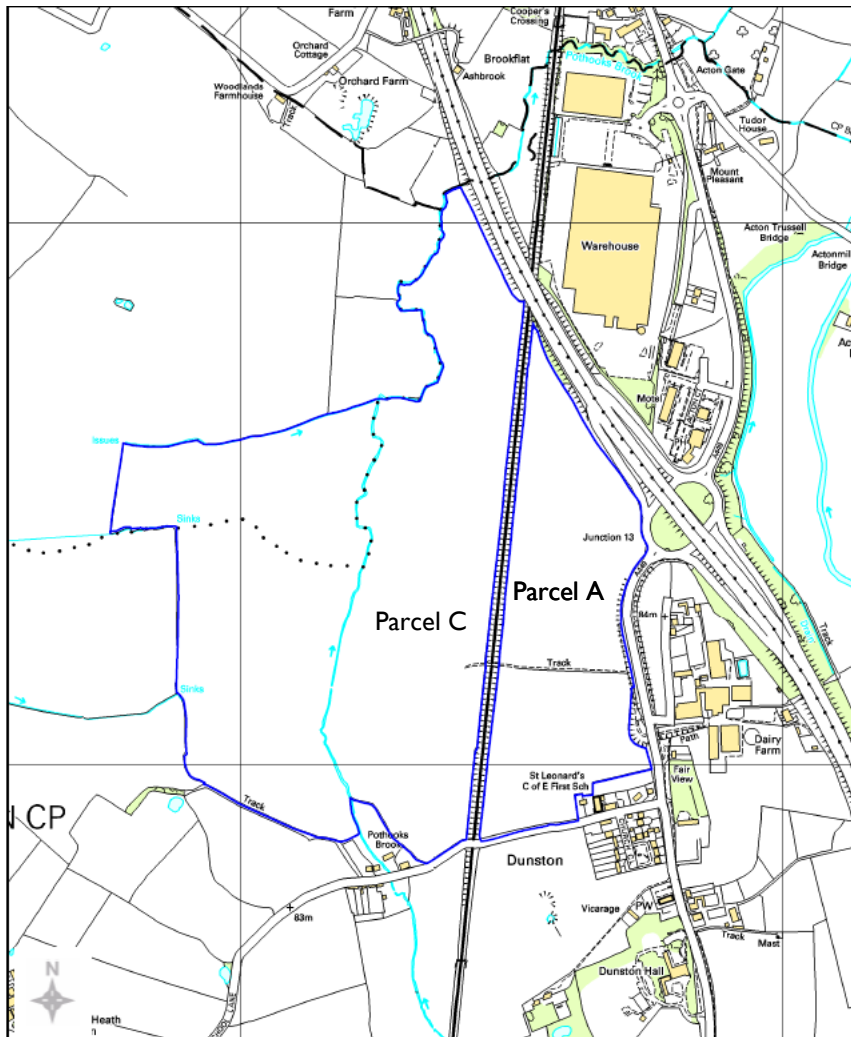


Figure 2: Site Boundary Plan.

- 9.16. A number of Public Rights of Way run through the Site, with Dunston 3 running north south, along the railway line, Dunston 16 b dissects the Site east west and connects the Site to the wider public right of way network. Dunston 2 and Dunston 16 c run across Parcel C to the west of Pothooks Brook. Dunston 17 connects the Site with the settlement of Dunston, and adjoins School Lane.
- 9.17. Pothooks Brook Watercourse is located to the western part of the Site, dissecting Parcel C. The eastern part of the Site is within Flood Risk Zone I and as such at low risk of flooding.

Part of the western part of the Site, adjacent to Pothooks Brook, lies within Flood Zones 2 and 3. The majority of the Site to the east of Pothooks Brook is at low risk of surface water flooding whilst the area around Pothooks Brook and some areas to the west are liable to surface water flooding.

- 9.18. The Site has varying topography, Parcel A generally falls in height from the south eastern corner of the Site adjacent to the A449 towards the north eastern corner of the Site, adjacent to the M6, with localised undulations. Parcel C falls from the Railway line towards Pothooks Brook before rising towards the western boundary.

Proposed Allocation – Nature of Development

- 9.19. The proposed allocation is for employment use, to provide an opportunity to meet the need for high quality employment sites in South Staffordshire, the Black Country and the wider region, ensuring sufficient choice to enable the market to operate effectively.
- 9.20. A Vision document has been prepared and previously submitted which included an indicative masterplan to demonstrate how a scheme can be developed. **Please note that the land to the east of the M6 Motorway is no longer being promoted for development by the land owner.**
- 9.21. Based on the Indicative Masterplan, and liaison with prospective development partners the Site is considered capable of delivering circa 2 million square feet of employment floorspace, across a range of units to meet the mid box, and big box need for industrial and logistics space, suitable for a network of knowledge and data driven creative or high technology industries; and/ or for storage and distribution operations at a variety of scales.
- 9.22. The main vehicular access will be from the A449. Access and circulation roads and footpaths will be provided between the various on-Site facilities, and will support access to the Site by non-car modes. Street lighting will be provided to ensure vehicular and pedestrian safety in-line with Highway Standards. The West Coast Mainline railway which passes through the Site also creates an opportunity for the delivery of a future rail halt within or close to the Site, creating further opportunities for sustainable transport routes.
- 9.23. Appropriate landscaping will be provided to the boundaries with potentially sensitive receptors. The development will be set within a landscape framework, with a network of green spaces including the enhancement of the area around the brook, providing opportunities

for ecological and biodiversity enhancement, as well as supporting recreation uses and the health and well-being of future occupiers.

- 9.24. Furthermore, it is noted that the Plan through Policy DS4 seeks to explore opportunities for long term growth, including the potential for a sustainable New Settlement. The Plan identifies an area of search along the A449, with the area north of Penkridge and south of Junction 13 of the M6 being located outside the Green Belt. It is noted that proposals have been submitted for Dunston Garden Village, which is located immediately to the south of the Site E30, Junction 13 of the M6. The proposals include some employment development, but these are limited in scale. We consider that the Site at Junction 13 is an eminently suitable employment location in its own right, but we also consider that the Site at Junction 13 provides a significant opportunity to enhance the sustainability of the proposed Dunston Garden Village development if it were to come forward in the future, through the delivery of a significant employment opportunities within close proximity of the proposed Garden Village development. This will serve to support the delivery of a critical mass of development sufficient to support significant improvements to the public transport infrastructure in the future, as well as supporting active travel.

Deliverability

- 9.25. The Site at Junction 13 of the M6 Motorway provides a development opportunity that is available, suitable and achievable and therefore it is considered that the Site is deliverable, in accordance with national planning policy and guidance. It is promoted by J Holt & Sons, and has significant developer interest which further demonstrates the Site's deliverability within the Plan period. The subsequent sections summarise the Site's availability, suitability and achievability.

Availability

- 9.26. The land is being promoted by J Holt & Sons. The landowners are committed to the development of the land and have appointed a technical team to provide resource, expertise, and experience. Furthermore, the Site has recently been taken to market and received significant interest, with a delivery partner expected to be announced imminently. The Site is therefore available in accordance with the 2021 Framework and the National Planning Practice Guidance (PPG).
- 9.27. The proposed development can make an efficient and attractive use of the land. The Site represents an excellent opportunity for the delivery of a strategic employment site,

responding to the shortage in strategic employment sites in the Midlands, and Black Country, and therefore meeting the identified need. This Site allows the employment land to be delivered in the short term within an appropriate location, responding the locational requirements of the sector. Significantly it does not require the release of Green Belt.

Suitability

9.28. The need for employment land has been detailed elsewhere within this representation, in which we confirm that there is a policy imperative to meet the needs for strategic employment sites in the short, medium and long term.

9.29. The 2021 Framework recognises that policies and decisions should have regard to the specific locational requirements of different sectors. The Site at Junction 13 of the M6 is capable of meeting the needs for strategic employment land in a non-Green Belt location. The West Midlands Strategic Site Assessment identifies the Site as one of the highest performing sites, within the region. The Council’s own evidence also concludes that the Site is “*suitable for employment use (i.e. potential suitable for logistics/distribution) and developers would be interested in bringing this site forward*”¹². The EDNA Part 2 recommendations conclude “*should there be a need to allocate new sites, where possible the focus should be on the ‘best’ sites in the first instance. These for example should include:*

- *West Midlands Interchange (Site E33) following consent in 2020;*
- *Sites E51a and E51b given that they are very close to the consented WMI; and*
- *Potentially site E30 at Junction 13 given that it is strategic in scale and not in the Green Belt.”*

9.30. The assessment notes that the EDNA, Part 2 identifies the Site as falling within the good quality sites, rather than best, however as highlighted earlier, we consider that the scoring does not reflect the market attractiveness of the Site, the Site’s location, lack of Green Belt constraints, and the Site’s viability in the context of the current demand for strategic sites. A more reflective scoring would identify the Site as falling within the best quality sites. Furthermore, it is the only site other than the WMI site identified within the EDNA, which is capable of meeting both sub regional and wider national need for employment development.

¹² South Staffordshire EDNA Part 2, Colliers, 2021

The Employment Sites Site Assessment Topic Paper, September 2021 also confirms that the Site performs relatively well with a clear advantage for distribution/logistics, noting that the Site is extremely accessible to the workforce. The Topic Paper concludes that the Site is not currently proposed for allocation as the Council's current evidence suggests that local needs are met and WMI has a role in meeting cross boundary needs. However, the evidence relating to need is being reviewed, and for the reasons set out elsewhere within this representation we consider that there is a significantly greater need for Strategic Employment Sites within South Staffordshire.

- 9.31. The Junction 13 Site lies to the south of Stafford urban area adjacent to Acton Gate which is providing a focus for employment in the area. The A449 adjacent to the Site provides excellent bus linkages to Stafford, Cannock and Wolverhampton, and the train stations at Penkridge and Stafford. The Site benefits from excellent connectivity to the Strategic Road Network, being located at Junction 13 of the M6 which provides links to the wider region and UK as a whole for HGV's and private vehicles, along with access to a decent labour market.
- 9.32. The development of the Site will address the identified need for the provision of Strategic Employment Sites that will benefit Stafford, the Black Country and the West Midlands region supporting the economic growth and recovery of the region. We therefore consider that the development of the Site is suitable.

Green Belt

- 9.33. Due to the significant need and demand for housing and economic growth, and the need for supporting infrastructure, there is clearly a requirement for a strategic review of the approach to locations for future growth within the Borough and the wider region. Approx. 80% of South Staffordshire District lies within the Green Belt. The need for a Green Belt Review and the release of some Green Belt land to support the growth of the Borough has been accepted by the Council. The Green Belt is also being reviewed in neighbouring authorities, with Green Belt release being considered in the Black Country in order to contribute towards meeting its Objectively Assessed Needs. We consider that it is imperative that prior to considering the release of Green Belt and concluding the existence of 'exceptional circumstances', paragraph 141 of the 2021 Framework, requires all other reasonable options for meeting identified needs for development to be examined. In the context of South Staffordshire, this includes the consideration of sites outside of the outer Green Belt boundary. There is no evidence to show that this has been effectively undertaken nor that appropriate weighting has been given to prioritising non-Green Belt sites ahead of Green Belt sites.

- 9.34. The Site at Junction 13 of the M6 is capable of meeting the identified needs for strategic employment sites in a non-Green Belt location. It is the only non-Green Belt site that the EDNA Part 2 recommends for allocation. Of the other rejected sites, it is the only non-Green Belt Site which would satisfy the requirements for a Strategic Employment Site within South Staffordshire outside the Green Belt. Furthermore of the sites considered within the West Midlands Strategic Employment Sites Study, 70% of the promoted sites are located within the Green Belt, with the Junction 13 of the M6 Site being one of a few sites that are both outside the Green Belt and which have excellent connectivity to the Black Country, Greater Birmingham and the wider region. The Site has the potential to meet the strategic employment needs of South Staffordshire, the Black Country, Greater Birmingham and the wider region and it should be fully explored prior to the release of any Green Belt sites, within South Staffordshire, the Black Country and wider region, consistent with the provisions of the 2021 Framework.

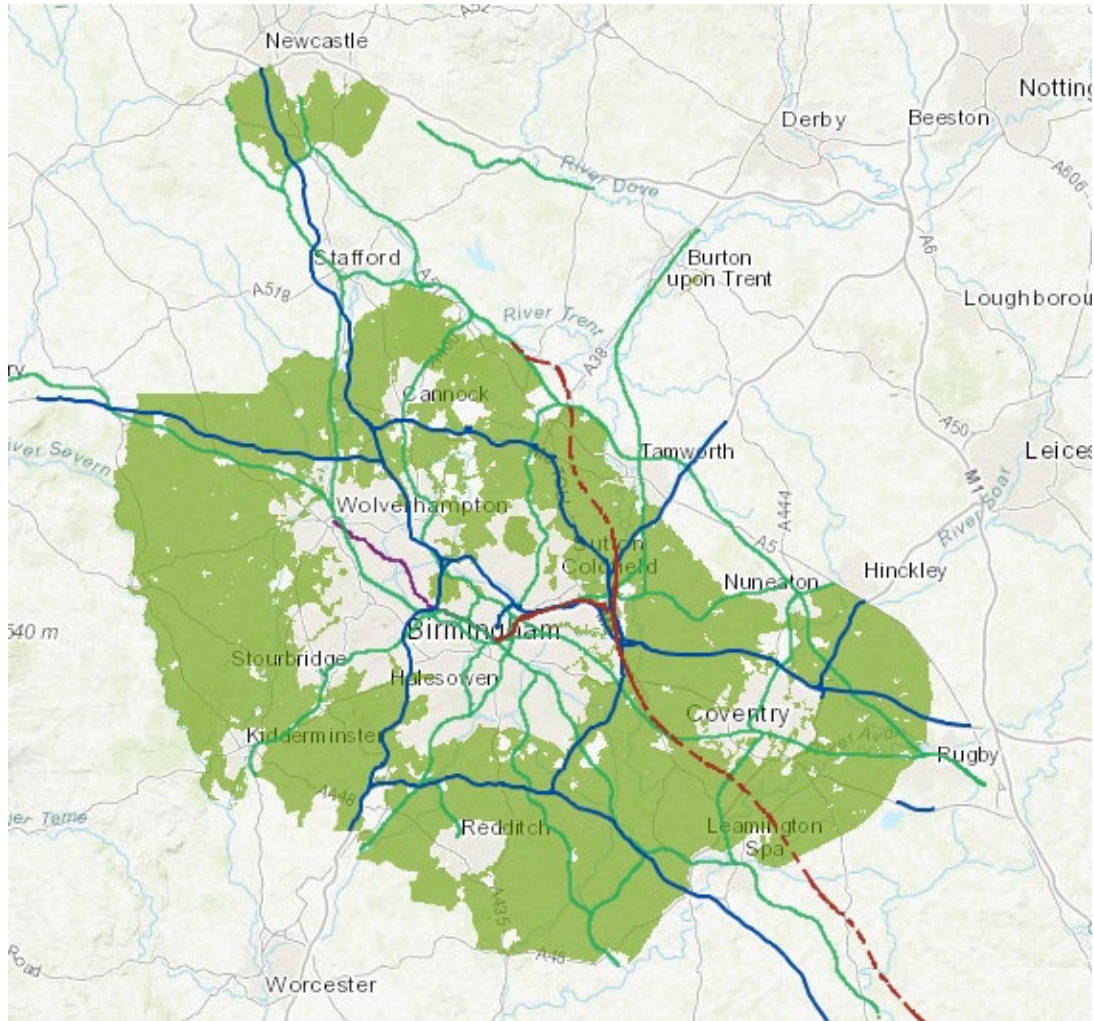


Figure 3: the Green Belt, Source: West Midlands Combined Authority – Dynamic Map

Achievable

- 9.35. A range of technical work has been undertaken in order to support the preparation of the J13 Vision. From the assessments there are no technical issues that would prevent development or which are insurmountable. The Site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. A summary of the non-policy considerations is provided below, followed by a brief summary of the technical evidence to support the proposals:-

| Non Policy Designation or Planning Consideration | Site Address / Proximity to the Site |
|--|---|
| Heritage Assets | There are no listed buildings within the Site, however there are two listed buildings within close proximity to the Site, including Dunston Farmhouse, a grade II listed building, and Dunston House, also grade II listed. The Site is not within or adjacent to a conservation area |
| Tree Preservation Orders | There are no TPO on Site |
| SSIs/SSSIs and other Ecological Designations | The Site is not within or adjacent to a SSSI |
| Flood Risk Zone | The Site lies predominantly within Flood Zone 1, the land around Pothooks Brook lies within Flood Zone 2 and 3. |
| Air Quality Management Area | The Site is not within an AQMA |
| Rights of Way | A number of Public Rights of Way run through the Site, including Dunston 3, Dunston 16 b. Dunston 2 and Dunston 16 c. and Dunston 17. |
| AONB or Landscape Designation | The Site is not within an AONB |
| Gas Pipeline | No high pressure gas pipeline crosses the Site. An 11kV overhead line crosses the Site. |
| HS2 Safeguarding | The Site is not affected by HS2 Safeguarding. |

- 9.36. Fore Consulting have undertaken a high level transport and access appraisal. This confirms that satisfactory access can be gained from the A449 and that the internal layout and parking arrangements will be determined at an appropriate stage and will be consistent with the prevailing policy. The assessment concludes that future employees would have an opportunity to undertake journeys to and from the Site by sustainable modes of travel, without reliance on the car. There are half hourly bus services, with connections to stations at Penkridge and Stafford, and the Site is within reasonable commuting distance by bike to Penkridge and Stafford. The assessment concluded that there was no barrier in transport and highways terms to the Site being allocated.
- 9.37. BWB have undertaken an additional assessment which demonstrates that there is a technical solution to delivering development on land to the west of the West Coast Mainline via a crossing over the West Coast Mainline and Pothooks Brook. Dove Haigh Phillips have prepared a high level financial appraisal which demonstrates that such a scheme is both technically and financially viable.

9.38. Based on the assessments undertaken to date, there are no known constraints which cannot be mitigated and which would preclude the development of the Site for employment purposes at this location.

9.39. Further technical evidence is being prepared and will be submitted in due course.

Effective Use of Land

9.40. The Site is easily accessible and it can be accessed from A449 off Junction 13 of the M6, and there is existing footpath connectivity to the Site. The scheme is therefore making an efficient and effective use of land and infrastructure.

Meeting Objectively Assessed Needs

9.41. The 2021 Framework requires Local Planning Authorities to meet their full Objectively Assessed Needs. As highlighted earlier within these representation, there is a significant shortage of Strategic Employment Sites within the West Midlands. J Holt & Sons considers that the Site at Junction 13 of the M6 Motorway is deliverable in the short term and would support the economic growth the Borough and wider sub region. The Site is capable of coming forward in a phased manner with Parcel A being fully capable of being delivered in the next 5 years, with land to the west of the West Coast Mainline coming forward in Phase 2.

A Positive Response to the Key Objectives of the Framework

9.42. The 2021 Framework sets out the Government's approach in relation to supporting economic growth.

9.43. In relation to the 2021 Framework:

- The proposal responds positively towards national planning policy guidance.
- The Site is capable of meeting the demands for a range of types of employment.
- The proposed Site is accessible to existing local communities supporting access to employment opportunities.
- The Site is located outside the Green Belt.
- The Site has been assessed and is available, suitable and achievable for development.

Land at Junction 13 of the M6 Motorway

9.44. The development of the Site would provide significant benefits. The Site would deliver a new strategic employment site that would meet the identified needs for strategic employment sites

in West Midlands. Therefore this Site provides a unique opportunity in a sustainable location that is not within the Green Belt. The Site is:

- Suitable for Employment Use.
- Uses land efficiently and effectively.
- Is appropriate in scale (over 25 hectares) and location for meeting the identified need for Strategic Employment Sites, and supporting economic growth and recover of South Staffordshire, the Black Country and the wider region.
- Is capable of delivering circa 2 million square feet of employment floorspace.
- Will maximise local employment opportunities, providing a range of entry level and skilled jobs, with potential for in work training.
- Will deliver a net biodiversity gain; and
- Is located in an area of search for long term growth options.

9.45. The proposal is an appropriate site to address the identified needs for Employment Land, consistent with the 2021 Framework and it will therefore support the objectives of the local plan.

Proposed Change

9.46. To overcome the objection and address soundness matters, the Council should:

- Allocate the Site at Junction 13 of the M6 Motorway for Employment Uses.