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Community Hub
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Dear Kelly,

**LOCAL PLAN: PUBLICATION STAGE (REGULATION 19 CONSULTATION)
EMPLOYMENT LAND POLICY AND ALLOCATIONS**

Please find enclosed separate representations in respect of **Policies DS4: Development Needs** and **SA5: Employment Allocations**. In each case, the representations comprise a completed representation form, a statement, and various appendices and enclosures. The representations have been produced following advice from leading counsel, Paul Tucker KC. The essential points of our representations are summarised briefly below: -

- Policy DS4 refers to a need of 62.4 ha and a supply of 107.45 ha of employment land, leading to a potential contribution of 45.2 ha to help meet the unmet needs of the Black Country. In our opinion, none of these figures are reliable and should be the subject of a complete reassessment, both quantitatively and qualitatively.
- The figure for local need is generated by a method (Labour Demand Model) which is acknowledged to be outmoded. Our analysis, based on the recent pace of development, indicates a **minimum local need of 129 ha**.
- The Council's assessment of supply to meet local need appears to be deeply flawed. It includes two sites – i54 Western Extension and ROF Featherstone – which have previously been expressly allocated to meet the needs of the Black Country and the wider region. Removal of these two sites, and adjusting the areas from gross to net developable, reduces the **supply to meet local need to just 23.6 ha from six sites**.
- By our calculations, this leads to a **significant shortfall of 105.4 ha**. This shortfall reduces to between 86.6ha and 100.4ha once a contribution from West Midlands Interchange is considered.
- This represents a significant gap between local need and supply. It also changes fundamentally the dynamic of the relationship between South Staffordshire and the Black Country and other parts of the FEMA (e.g. Cannock).

- **Qualitatively**, there is an **urgent need to bring forward new strategic employment sites** (defined as greater than 25 ha) at both a sub-regional and regional level, as identified by the West Midlands Strategic Employments Sites Study of 2021. The findings of this study have been largely disregarded and no reference is made to the draft findings of its successor study which is well advanced in its production.
- The plan also pays insufficient regard to relevant national planning policy guidance, which is increasingly supportive of large scale industrial and logistics development, and totally ignores the opportunity presented by the planned M54/M6 link road.
- For these reasons, we believe **the plan is presently unsound** on this basis. To remedy the position, the Council needs to: -
 - Totally reconsider its approach in assessing and balancing local need and supply.
 - Work collaboratively with its neighbouring authorities to ensure a sufficient quantity and quality of employment development, particularly strategic scale sites, is brought forward to meet the wider needs of the FEMA.
 - Identify and allocate additional new sites through Policy SA5.
- **These circumstances are exceptional** and, given the extent of the Green Belt land under the Council's jurisdiction, justify the review and alteration of the boundaries to the Green Belt.
- The assessment of new sites should include the potential strategic employment site at **Hilton Park at J11, M6**. It is an obvious employment site due to its location, relationship with planned infrastructure improvements (i.e. M54/M6 link road), and scale (a developable area of 43 ha). It was graded highly by the most recently published West Midlands Strategic Employment Sites Study.
- The assessment of this site by the Council to date has been flawed. Evidence submitted on its suitability and deliverability has been ignored and no account, inexplicably, has been taken of the effect of the M54 M6 link road which will clearly compromise the openness of this part of the Green Belt.
- Given the circumstances, as described above, we consider the opportunity that exists at Hilton Park should be reassessed. If properly assessed, then its merits in meeting local and wider needs would become clear.

Yours sincerely,

Peter Leaver
Planning Director
Nurton Developments Ltd