

**South Staffordshire Local Plan
Preferred Options
Representations on behalf of
Richborough Estates**

Land at Gailey Lea Farm

Richborough Estates

December 2021

LICHFIELDS

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1.0 Introduction

- 1.1 These representations to the South Staffordshire Local Plan Preferred Options (“the PO”) have been prepared by Lichfields on behalf of Richborough Estates Limited (“Richborough”).
- 1.2 We focus on the strategic employment matters that are contained within the PO consultation document and relate specifically to Richborough’s land interests at Land at Gailey Lea Farm, Gailey Lea Lane, South Staffordshire (“the Site”). Importantly, these representations relate to Richborough’s interests at the Site only. Richborough is promoting other sites for residential uses within the District, and have commented on non-employment related matters in each set of respective representations where necessary.
- 1.3 Richborough notes that the Site has not been previously submitted to the Council for consideration through the emerging Local Plan Review. In this regard, a summary of Richborough’s proposals for the Site is outlined in Section 2.0 of these representations. However, Richborough seeks to work constructively with South Staffordshire Council (“the Council”) as it progresses towards the submission and adoption of the Local Plan Review to ensure that sufficient employment land has been allocated to meet the needs of the South Staffordshire Functional Economic Market Area¹ [FEMA] and trusts that the comments contained within this document will assist Officers in this regard. In due course, Richborough would be pleased to meet with the Council to discuss the opportunities presented by the Site.

Plan-making to date

- 1.4 To date, the Council has consulted on an ‘Issues and Options Consultation’ (“IOC”) between 8 October and 30 November 2018, followed by the South Staffordshire Spatial Housing Strategy & Infrastructure Delivery (“the SHSID”) and the Infrastructure Delivery Plan 2019 [IDP] between 17 October and 12 December 2019.
- 1.5 The IOC noted that the District had a sufficient supply of available employment land to meet its own employment requirements up to 2037, with a c.20ha oversupply (Para 4.24). However, the IOC did not define the Council’s preferred approach, rather it set out three employment growth policy options, including de-allocating poor-quality sites, maintaining the current supply, and allocating additional employment land to meet the Council’s and wider, cross-boundary employment needs up to 2037. Consequently, the SHSID only sought views on how the Council’s housing target could be best planned for through a variety of Spatial Housing Options to distribute housing growth across the District; it did not explore options for meeting the District’s employment needs, which it stated would be addressed in the PO (Para 1.13).
- 1.6 The Council is now undertaking a consultation on the PO, which builds upon the responses received to the IOC and SHSID. The PO now sets out the Council’s proposed strategy and site allocations to meet the District’s employment needs up to 2038 as well as the Black Country’s unmet needs.

Structure

- 1.7 These representations are structured as follows:
- **Section 2.0** – Sets out Richborough’s vision for Land at Gailey Lea Farm, Gailey Lea Lane, South Staffordshire; and

¹ Comprising South Staffordshire, Wolverhampton, Walsall, Dudley and Cannock Chase.

- **Section 3.0** – Sets out Richborough’s representations to the Council, structured around the questions set out in the PO consultation, and relating specifically to employment-related matters. These being:
 - i *Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.*
 - ii *Question 3:*
 - a) *Have the correct vision and strategic objectives been identified? Yes/No*
 - b) *Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No*
 - iii *Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No If no, please explain how this policy should be amended?*
 - iv *Question 10: Do you support the proposed allocation in Policy SA7? Yes/No*

2.0 Land at Gailey Lea Farm

2.1 As set out in Section 1.0 of these representations, Richborough is promoting Land at Gailey Lea Farm for employment development – see Figure 2.1 below. Richborough's has not previously promoted the Site to the Council through the emerging Local Plan Review. As such, to date, the Site has not been assessed through the Council's 'Strategic Housing & Economic Land Availability Assessment' [SHELAA], nor any of the Council's wider evidence base prepared in support of the emerging Local Plan Review and is not a draft allocation in the Council's PO.

2.2 However, Richborough wishes to confirm the Site's status as being *'suitable, available and achievable'* and, working in the knowledge that the Site is strategically located with excellent access to the forming West Midlands Interchange [WMI] and Strategic Road Network [SRN], Richborough consider that the Site could serve as a logical and sustainable employment allocation. As such, the Site should be included as an employment allocation in the emerging Local Plan Review.

Figure 2.1 Land at Gailey Lea Farm



The Site

2.3 The Site falls within the administrative boundary of South Staffordshire Council ("the Council") and comprises c.87 hectares [ha] of greenfield and brownfield land, currently utilised as agricultural fields, agricultural farms and associated buildings. The Environment Agency's Map identifies the site as being located within Flood Zone 1 and being at low risk of flooding. There are no heritage assets on the site.

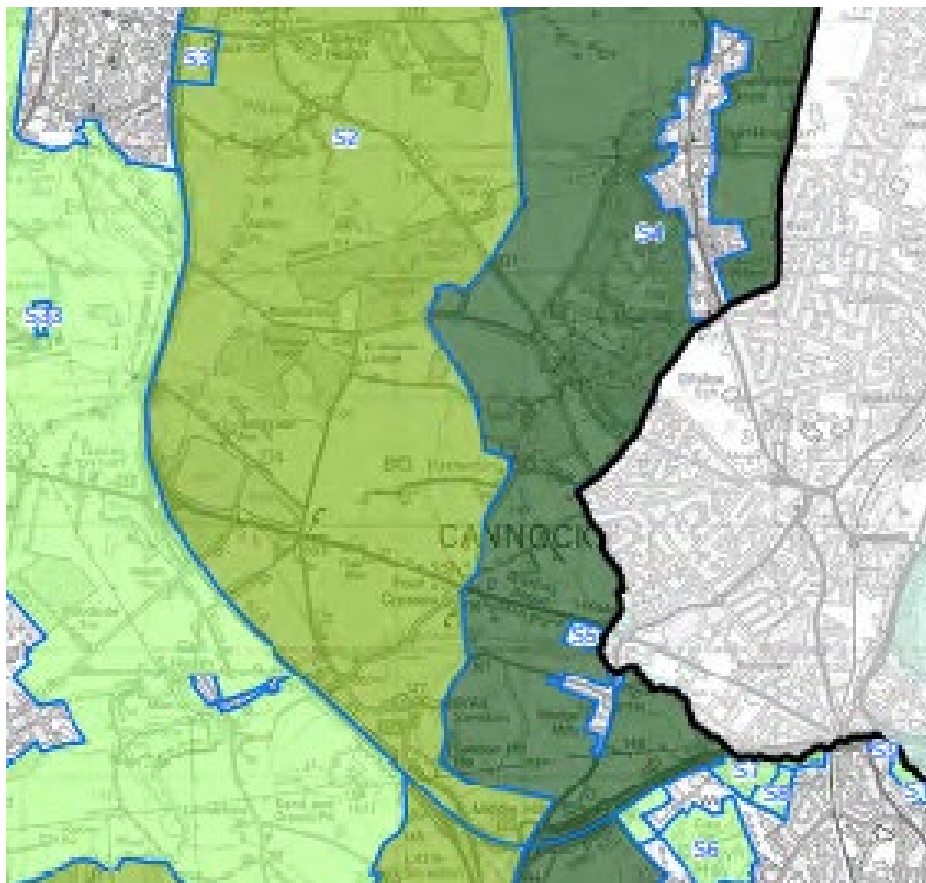
1.1 The site is situated north of the A5 and Gailey Lea Upper and Lower Reservoirs, to the east of the M6, and to the south of Fullmore Wood Ancient Woodland, and is currently designated as Green Belt. Gailey Lea Lane connects to the A5 to the south of the site. The surrounding area to the site could be generally characterised as agricultural, with several large rural dwellings/farms within the area; together with stretches of ribbon development along the A5 towards Cannock.

However, to the south-west of the site, and beyond the M6, is the site for the recently approved² c.300 ha WMI, which comprises an intermodal strategic rail freight interchange terminal (“SRFT”), c.743,200 sq. m of rail-served warehousing floor space, a small amount of space for ancillary buildings and storage areas, along with at least c.108 ha of on-site Green Infrastructure.

Green Belt

- 2.4 As noted above, the Site falls within the Green Belt. The site has been assessed through the ‘South Staffordshire Green Belt Study Stage 1 and 2 Report (July 2019)’³ (“the GB Report”). The site was assessed as a part of Parcel S2 (Figure 2.2).
- 2.5 Against the five purposes of the Green Belt,⁴ in the first Stage 1 assessment, the GB Report concluded that the parcel scored moderate against Purpose 1, Weak/No Contribution against Purpose 2, Strong against Purpose 3, and Weak/No Contribution against Purpose 4. In essence, the Site is located in an area of relatively low performing Green Belt. It is noted that the Stage 2 assessment does derive smaller sub-parcels, however, Parcel S2 was not further refined into smaller sub-parcels within the Stage 2 Assessment.

Figure 2.2 Parcel S2 Green Belt Parcel



Source: Figure 5.1a, South Staffordshire Green Belt Study Stage 1 and 2 Report (July 2019)

² A Development Consent Order application was submitted to the Planning Inspectorate on 3 August 2018 and approved by the Secretary of State in May 2020.

³ Prepared by LUC on behalf of the City of Wolverhampton, Dudley, Sandwell and Walsall (i.e. the Black Country Authorities [BCAs]) and South Staffordshire.

⁴ Paragraph 138, NPPF (2021)

- 2.6 It is therefore difficult to meaningfully apply the conclusions of the Stage 1 assessment to the Site. The Site would only represent a small fraction of the overall S2 parcel, adjacent to the M6 and A5 and importantly the WMI on the other side of the M6. If the Council were to give due consideration to a smaller parcel, relevant to the scale of Richborough's Site, it is considered highly likely that the parcel would have a weak contribution to the five purposes, and the harm from its release would be considered to be 'Very low harm/Low harm' by virtue of the significantly urbanising impacts that the WMI – which is proposed for release from the Green Belt (Policy SA7) – and M6 will have on this area of the Green Belt – further consideration of the Site's contributions to the five purposes of the Green Belt will be set out in the future Vision Document [VD].
- 2.7 Notwithstanding this, Richborough notes that the NPPF does not require only the release of sites that perform the worst against the Green Belt purposes (i.e. low Green Belt harm). There is a need to consider the broader Green Belt policies in the NPPF as a whole. In this context, when reviewing sites within the Green Belt, the Council should have regard to whether the site would contribute towards the promotion of sustainable patterns of development, whether it has good access to public transport, whether compensatory improvements could offset the harm from its removal (Para 138) and the consistency of the Green Belt with the emerging Local Plan Review strategy. It is, therefore, an essential part of the exceptional circumstances test that Green Belt land (that fulfils poor to moderate Green Belt purposes) can be released if it is consistent with the Local Plan strategy for meeting requirements for sustainable development, for example, to secure more sustainable patterns of development.
- 2.8 In this regard, the site is located adjacent to the M6 J12, the A5 and the forthcoming WMI, and has easy access to the M54 to the south. It is located in a crucial area within the District, which will act as a key employment corridor within this part of the District. In essence, the Site is a highly sustainable and logical location for employment growth. Indeed, whilst the 'South Staffordshire EDNA Part 2: Economic Land Availability Assessment ("the Stage 2 EDNA") has assessed 25 other sites within the District, few offer the strategic scale and proximity to the WMI. This is a point partially raised in the Stage 2 EDNA when it suggested that the focus should be on the 'best' sites, such as the extensions to Bericote Four Ashes (References: E51a and E51b) as they were "*very close to the consented WMI*" (Para 5.3). It is also well placed to meet the Black Country Authorities' [BCAs] unmet employment needs in close proximity to where they arise, given its proximity to Wolverhampton. The delivery of environmental enhancements on-site, which could also be achieved as part of the development, would ensure that any harm arising as a result of the removal of the site from the Green Belt could be offset.

Proposals for the Site

- 2.9 As indicated above, Richborough is proposing a new high-quality employment site at Gailey Lea. The Site is ideally located to capitalise on the approval of the adjacent WMI – separated by the M6 – and therefore its proximity to both the SRN and SRFI. The WMI will have a significant urbanising impact on the Green Belt land surrounding it and will – importantly – heighten the importance of Junction 12 of the M6 as an SRN junction for HGV vehicles travelling to and from the WMI.
- 2.10 The WMI SRFI, located west of Junction 12 of the M6, will connect into the West Coast Main Line, one of the country's principal rail freight routes. The primary role of the SRFI is to provide new rail-served and rail-linked warehousing allowing the West Midlands, the Black Country, Staffordshire and Birmingham's important logistics industry to grow. Importantly, the SRFI will be an open-access intermodal terminal, operated by an independent service provider, but open to all users and train operators. This will enable other employment sites within the District to capitalise on this modal shift of freight within the area. It is clear that the WMI will play a

crucial role in the wider region's economic future, and is likely to draw significant interest from regional and national businesses within the area.

- 2.11 In this regard, the Site is ideally located in an area that will appeal to regional and national companies looking to capitalise on the opportunity and connections presented by the recently approved WMI, whether that be manufactures, or rail-linked storage and warehousing. As such, Richborough's 'Vision' for the Site comprises a high-quality, sustainable, attractive and accessible development, complementing the existing WMI in the area.
- 2.12 In this context, Richborough has prepared a SHELAA 'Call for Sites Suggestion Form' ("CfS Form") which will be submitted alongside these representations to the Council. In due course, a VD will be submitted to the Council to identify how the Site could deliver Richborough's proposals. However, in the interim and in support of these representations and the CfS Form, an indicative masterplan has been prepared, which demonstrates how the Site could deliver approximately c.228,000 square meters [sq. m] of high-quality B8/Logistics floor space, together with attractive open space, other supporting infrastructure and a visual buffer of planting along the northern Site edge to create a defensible boundary.
- 2.13 Importantly, Richborough considers that the release of the Site from the Green Belt, and allocation of the site for employment in the emerging Local Plan Review, would unlock the Site's position along this key employment corridor on the SRN and next to the open-access SRFI and secure long term success and economic growth in South Staffordshire and across the FEMA more widely.

The Benefits

- 2.14 The National Planning Policy Framework (2021) [NPPF] is clear that the purpose of the planning system is to contribute to the achievement of sustainable development (Para 7). It goes on to state that "*achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways*" (Para 8); those being, economic, social and environmental.
- 2.15 In this context, Richborough considers that the development of the Site would meet the Government's overarching objective to achieve sustainable development by providing significant economic, social and environmental benefits. Further details in relation to these benefits are set out below:
- 1. Economic**
- 2.16 The development of the Site will contribute towards building a strong, responsive and competitive economy within South Staffordshire and across the FEMA, contributing towards the Government's 'levelling-up' agenda.
- 2.17 The Black Country, due to a gradual decline in certain sectors of the economy, has suffered from unemployment and parts of it constitute some of the most deprived economies in the UK. Alongside this, the area faces a skills deficit and a lack of economic dynamism.
- 2.18 The development would assist with meeting the BCA's emerging Draft Black Country Plan 2018-2039 objective of 'Enabling a strong, stable and inclusive economy'. In particular, it would align with Strategic Priorities [SP] 7 and 8, supporting the development of key employment sectors and enabling existing businesses to expand (SP7), as well as ensuring that communities share the benefits of economic growth through securing access to new job opportunities and enhanced skills and training programmes (SP8).
- 2.19 It would also align with the South Staffordshire's Strategic Objective 6 by fostering sustainable economic growth, encouraging inward investment and creating jobs. It would also assist in

addressing some of the Council's key issues and challenges within the District, such as ensuring residents have good access to a range of employment opportunities and supporting the economies of adjoining areas. An Economic Benefits Infographic has been prepared in support of these representations, which is appended at Appendix 1. In this regard, the proposals for the Site would bring several significant operational economic benefits in terms of:

- Up to 2,521 full-time jobs;
- Support an additional 731 full-time jobs indirectly through supply chains in the local area and employee spending;
- Generate over £107m gross value-added [GVA] per annum; and,
- Generate £5.5m in business rate revenue per annum.

2.20 The development would also attract significant investment into the area which will contribute to infrastructure improvements and the general health and well-being of the local population.

2. Social

2.21 As noted above, by virtue of the Sites proximity to the Black Country, it would make a logical employment site to meet the acute unmet employment land needs arising from the Black Country. Alongside higher than average levels of deprivation, the area also suffers from significant service and demographic pressures including lower rates of physical activity and higher rates of obesity than the rest of England, children living in poverty and of unemployment than the average for England and teenage conception. Employment levels are comparatively low as a result of this poor health and wellbeing.

2.22 In this regard, the development of the Site would help develop a strong, vibrant and healthy community by providing additional employment and training opportunities for residents of the Black Country. The proposal could support inclusive growth within the Black Country, ensuring the economic benefits and opportunities of the development are experienced by all sections of the local community (SP8).

2.23 The future operation of the Site is estimated to:

- Provide 2,521 full-time employment opportunities that are targeted at the local population of the Black Country;
- Provide training opportunities for skilled and unskilled workers in the Black Country and the surrounding areas to improve unemployment levels and skill gaps;
- Provide apprenticeship opportunities both during construction and operation phases, which provide an opportunity to improve high levels of unemployment and deprivation in the Black Country.

3. Environmental

2.24 The Site is currently in use as grazing land and is of limited ecological value. A key part of the vision for the Site is to enhance its ecological value. The proposals for the Site could provide green infrastructure corridors and enhanced areas of green spaces throughout the Site, alongside further bespoke planting and landscaping.

2.25 The Site could also support the facilitation of the modal shift in freight from road to rail that the WMI presents, by ensuring the co-dependent uses are co-located around the WMI, thereby further reducing the need for road freight and playing an important part in the move to a low carbon economy.

- 2.26 The Site could provide significant areas of green open space which can be enhanced for wildlife, particularly along the northern boundary. Significant open space is provided to the northeast of the Site which creates an opportunity to provide enhanced ecological features, creating a range of semi-natural habitats such as wildflower meadows, scrub, woodland and wildlife ponds next to the Fullmoor Wood Ancient Woodlands. It is anticipated that throughout the development; grassland areas, hedgerows, treelines and water bodies including Sustainable Urban Drainage Systems [SuDS] features could be provided to enhance the Site for wildlife that could support biodiversity net gain on the site.

3.0 Areas of response

3.1 Richborough's response to the PO Questions is set out below, using the same questions contained in the PO document for continuity.

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan? Yes/No Please provide comments on the content or use of the evidence base set out in Appendix A, referencing the document you are referring to.

3.2 The NPPF is clear that Local Plans should be underpinned by relevant and up-to-date evidence, which should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (Para 31). To be found 'sound', it is also clear that Local Plans should be 'justified' and be based on an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (Para 35 b).

3.3 In general, Richborough agrees that the evidence base documents set out in the PO (Appendix A) are appropriate and necessary to underpin the emerging Local Plan Review. However, Richborough has some concerns regarding the robustness of the Council's 'South Staffordshire EDNA Part 1 (August 2018)' ("the Stage 1 EDNA"), largely due to the passage of time.

3.4 As identified by the Council in PO (Para 4.58) and the 'Employment Sites: Site Assessment Topic Paper (September 2021)' ("the Topic Paper") (Para 5.7), the Council's EDNA is now markedly out of date in light of the implications of Covid-19 and Brexit. Consequently, the Council intends to update the EDNA to review whether the demand for employment land has changed; albeit, it may be that the Council's forecast job growth may have increased compared to the forecasts from Oxford Economics in 2018 – discussed in further detail in Richborough's response to Question 5 below.

3.5 Such an approach would align with the other authorities within the FEMA. Indeed, in December 2020, the adjoining Cannock Chase District Council published an update to the 'Cannock Chase Economic Development Needs Assessment Covid-19 Update (December 2020)' as an update to their previous HEDNA published in April 2019.⁵ Specifically, the updated EDNA looked at the implications of the Covid-19, the uncertainties surrounding the consequences of Brexit and the introduction of the new E Class. Notably, it found that despite a short term impact on job growth, over the medium/long term, the Experian forecasts projected stronger employment growth in Cannock Chase than was previous forecasts, even accounting for the pandemic and Brexit (Para 6.3). It also concluded that the logistics sector is forecast to grow strongly in the Experian projections (Para 5.110). Similarly, the BCAs published the 'Black Country Economic Development Needs Assessment (EDNA) Update (August 2021)', which updated their previous EDNA from 2017⁶ (discussed in detail in paragraphs 3.23 to 3.29 below).

3.6 The fact that the Council has commissioned up to date evidence on employment land needs is welcomed, particularly given that it will be a core and critical piece of the Council's evidence base to ensure that the Local Plan Review is '*underpinned by relevant and up-to-date evidence*', and is '*focussed tightly on supporting and justifying the policies concerned.*' (Para 31, NPPF).

Question 3:

a ***Have the correct vision and strategic objectives been identified? Yes/No***

⁵ 'Cannock Chase Economic Development Needs Assessment Final Report (April 2019)'

⁶ 'Black Country Economic Development Needs Assessment (May 2017)'

- 3.7 In respect of the 12 Strategic Objectives that the Local Plan Review would seek to address (Pg. 24), on the face of it, Richborough does not have too many concerns with the Council’s proposed Strategic Objectives and considers that these objectives would align with the economic, social and environmental goals and ambitions of the NPPF, and would be delivered through the preparation and implementation of the Local Plan Review, as required by paragraph 9 of the NPPF.
- 3.8 However, in relation to ‘Economic Vibrancy’, the Council’s proposed Strategic Objectives 6 and 7 imply only a South Staffordshire-facing approach, which does not refer to the Council’s role in assisting neighbouring authorities with meeting unmet employment land needs. Conversely, in relation to a similar issue, the Council’s Strategic Objective 2 specifically refers to also addressing, via a contribution, the unmet housing needs of the Greater Birmingham Housing Market Area.
- 3.9 In this context, the NPPF emphasises on the importance of *“the need to support economic growth and productivity”* (Para 81). It is also clear that *“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas”* (Para 11b) and goes on to state that plans should be *“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”* (Para 35c). In addition to this, as required by the NPPF, local planning authorised [LPAs] are under a duty to cooperate [DtC] with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries (Para 24). Indeed, for Local Plans to be found ‘sound’, they must demonstrate that they are based on *“effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred”* (Para 35c).
- 3.10 It is noted that the PO, at Table 4 (Economic Vibrancy – Issues and Challenges), recognises the need to support *“the economies of adjoining areas and pressure to release land to meet a proportion of their unmet employment needs”* as an Issue/Challenge. It also acknowledges that:
- *“South Staffordshire EDNA (2018) identifies South Staffordshire as being in the same FEMA (Functional Economic Market Area) as Cannock Chase district, Dudley, Walsall and Wolverhampton. The Black Country authorities have a significant unmet need for employment land in their forthcoming plan period.*
 - *“As South Staffordshire is in the same FEMA as three of the Black Country authorities the Local Plan needs to consider South Staffordshire’s role in meeting any cross boundary needs.” (Table 4) (Emphasis added)*
- 3.11 Indeed, in the supporting text to draft Policy DS3 (The Spatial Strategy to 2038), the Council acknowledges that the BCA’s emerging Black Country Draft Plan confirms a c.210 ha shortfall in employment land which will need to be exported (Paras 4.55 and 4.57) and that the Council may have *“scope to contribute towards unmet needs elsewhere in the FEMA”* (Para 4.57). Importantly, the Council also notes that the *“exact amount of the oversupply to be attributed to their unmet needs will need to be agreed through a Statement of Common Ground”* (Para 4.57).
- 3.12 In this context, it is plain to see that the Local Plan Review will need to assist in meeting the unmet employment needs of its neighbouring authorities in the FEMA up to 2038 at the very least. Without the Council’s assistance in addressing this crucial matter, there is a real risk that the FEMA’s employment needs may not be fully met. When having regard to the clear objectives of the NPPF set out above, Richborough considers that the Council’s current Strategic Objectives omit an acute and pressing matter; that being the unmet employment land needs of the FEMA. Again, whilst it is noted that PO does acknowledge that the Council will need to assist in meeting this unmet employment land need, it fails to recognise the acuteness and seriousness of this situation in the Strategic Objectives.

3.13 To this end, given the critical importance of this matter and that the Council is legally obliged to assist in meeting these needs upfront (i.e. NPPF Paras 11b and 35c), Richborough considers that the Local Plan Review should identify assisting its neighbouring authorities to help them deliver the employment land that they need as a Strategic Objective in its own right.

a ***Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives? Yes/No***

3.14 Richborough does not consider that the Council’s proposed approach to addressing the District’s employment needs, and the unmet needs of the wider FEMA, proposed in draft Policy DS3 (The Spatial Strategy to 2038), would adequately deliver Strategic Objectives set out in Table 6 of the PO. In particular, it would not deliver Strategic Objective 6 or the additional Strategic Objective required to address the unmet employment land needs of the FEMA – discussed above in our response to Question 3b. This is discussed further in Richborough’s response to Question 5 below.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? Yes/No If no, please explain how this policy should be amended?

3.15 The NPPF is clear that development plans “*must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area*” (Para 17). The NPPF also requires plans to contain strategic policies which should, as a minimum, provide for objectively assessed needs for housing and other uses (Para 11b). In the context of employment land, the NPPF emphasises the importance “*on the need to support economic growth and productivity*” (Para 81) and is clear that planning policies should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*” (Para 82c).

3.16 In this regard, draft Policy DS3 (The Spatial Strategy to 2038) of the emerging Local Plan Review sets out how the Council will address the employment land needs of the District up to 2038. Fundamentally, the draft policy supports the continued growth of the District’s five existing freestanding strategic employment sites (namely the WMI, 154 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes), whilst safeguarding other existing and proposed employment sites throughout the wider District.

3.17 This policy is underpinned by the Council’s employment land evidence which has been prepared in support of the Local Plan Review, comprising the Stage 1 EDNA, Stage 2 EDNA and the Topic Paper.

3.18 Notably, the Stage 1 EDNA assessed the Council’s employment land needs over the 2018 to 2039 period. For this, the Stage 1 EDNA explored three trend-based options for calculating demand: projected employment growth (based on the 2018 Oxford Economics projections); a Gross Value Added-based projection [GVA]; and a historic completions trends-based projection. Each of these methodologies provided different employment land requirements for this 20-year period, totalling 0.5 ha – due to a reduction in manufacturing jobs – 19 ha and 67 ha, respectively. Of these projections, it is important to note that the majority of the demand within each projection was for storage and distribution-based requirements, except for part completions. However, it concluded on two growth scenarios, which blended the three aforementioned methodologies; Past Completions (67 ha) and GVA Growth⁷ (86 ha). Against the 105 ha supply identified in the Stage 1 EDNA, this resulted in a surplus supply of employment land ranging from 19 ha to 38 ha. Subsequently, the Stage 2 EDNA recommended that the Council pursues the GVA Growth option.

⁷ Which combined the past completions and GVA growth.

- 3.19 In addition to the c.105 ha of available employment land identified with the Stage 1 EDNA, the Stage 2 EDNA assessed a further 25 sites (as identified through the CfS/SHELAA), which included the consented WMI, totalling c.896 ha of land; however, of these sites, only 22 were considered potentially suitable (834.2 ha). Consequently, the Stage 2 EDNA identified 7 sites of 'best' quality employment land – which included the WMI – and recommended that, where new allocations were required, the focus should be on the 'best sites' in the first instance, and specifically referred to the WMI, Land South of Junction 13 of the M6, and two extensions to Bericote Four Ashes as they are very close to the consented WMI (Para 5.3). Despite this, on the basis of the needs identified in Stage 2 EDNA, the PO has only made provision for c.107 ha of employment land when excluding the WMI (See Table 9) – the supply from the WMI is not necessarily all attributed to the Council as it serves a regional role. Of this, and notwithstanding the WMI, only two strategic sites⁸ have been identified at ROF Featherstone and i54 (Western Extension) with a combined capacity of 76 ha.

The Council's evidence base

- 3.20 As set out in Richborough's response to Question 1 above, the NPPF is clear that Local Plans should be underpinned by relevant and up-to-date evidence, which should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (Para 31). To be found 'sound', it is also clear that Local Plans should be 'justified' and be based on an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (Para 35b).
- 3.21 As acknowledged in the PO (Para 4.58), the EDNA is now markedly out of date in light of the implications of Covid-19 and Brexit and the Council intends to prepare an update prior to the Publication version of the Local Plan Review. In this context, and again set out in Richborough's response to Question 1 above, Richborough agrees with the Council that there is a need to update this evidence base, particularly in relation to evidencing the need for employment land within the District. At present, there are a number of deficiencies in the Council's approach which Richborough consider points to potentially a significantly greater level of need for B8 storage and distribution floorspace in the District and across the FEMA than is recommended in the Council's current evidence base. In particular, Richborough notes the following:
- 1 **Projected Job Growth:** It is noted that the Stage 1 EDNA's forecast job growth scenario – based on the Oxford Economics forecasts – was based on forecasts from 2018, which are now nearly 4 years out of date. Whilst past job forecasts indicated a limited increase in job growth within the District, partly as a result of declining manufacturing employment, it is important to note that the national Experian forecasts of April 2021 show an increase of 1.6% nationally in the logistics sector alone by 2040, when compared to the pre-Covid 19 (March 2020) forecasts, which is largely a result of Covid-19 and Brexit.
- Moreover, the job growth associated with the WMI – 8,500 jobs – would fall out with the Oxford Economic ambient forecasts for growth. As such, the projected job growth within the District may now be markedly above the previous 2018 projections. Indeed, the Stage 1 EDNA concluded that going forward "*consideration should be also given to a number of development and infrastructure proposals that could have a significant impact on the future property market in South Staffordshire, should/when they materialise e.g. West Midlands Interchange and M54/M6/M6 toll link road*" (Pg. 58). The high level of home working as a result of the Covid-19 may also mean that future patterns of working are changed permanently, which may have a serious knock-on effect on the need for new office space. Accordingly, the Council's future update to the EDNA should review the most up-to-date job growth projections to ensure that the currently proposed c.105 ha employment

⁸ Over 25 ha in size.

provision would appropriately respond to the level of job growth now predicted, particularly in relation to the increase in logistics jobs; and

- 2 **Past Trends/Completions:** Richborough notes that the underlying data collection and analysis contained in the Stage 1 EDNA was produced prior to the Covid-19 pandemic, with the logistics requirements derived from net completion rates covering the 2012/13 – 2017/18 period. Richborough considers that this five year period is not a reliable basis upon which to forecast a 20-year Local Plan period and does not reflect the recent development and market activity. Indeed, the Growth Scenario 2 only projected a need for c.35 ha of logistics land, which is likely to be markedly below where current trends would indicate.

Logistics is a fast-moving sector and one that has seen unprecedented growth over the past 18 months. The sector has changed significantly in recent years and is a key driver of commercial property markets, maintaining significant levels of demand and activity. Indeed, post 2018 and following the advent of Covid-19 and Brexit, e-commerce trends that might otherwise have taken much longer to occur have been greatly accelerated. Indeed, nationally, industrial & logistics take-up was 15.0m sq. ft in Q1 2021– the strongest on record for a first quarter and 21% above the five-year quarterly average.⁹

Similarly, research indicates a markedly increased demand for logistics units within the West Midlands, which has resulted in only 0.91 years' worth of supply in the region.¹⁰ As Knight Frank has advised, “*availability is reaching critical levels of shortage, and the current pipeline of speculative development only goes some way in plugging the gap*”.¹¹ It is therefore highly likely that the currently proposed logistics requirements, set out in the Stage 1 EDNA and proposed in the emerging Local Plan Review, underestimate the latest market activity and economic developments and creates the risk to compromise economic growth across the area. In any case, these requirements relate to *local, indigenous requirements for small businesses* operating in the logistics sector within the District and do not reflect the strategic requirements that are identified across the appropriate market area – this is discussed further below.

- 3 **Net to Gross Employment Requirements:** The Stage 1 EDNA estimates the net employment requirements across the District without applying any additional allowances that are typically included within the recommended employment requirements.

In particular, to convert net employment requirements to planning (or gross) employment requirements the approach should include the appropriate levels of additional allowances, including:

- An allowance of 8% is typically added to positive floorspace requirements to reflect ideal levels of market vacancy in employment space;
- It may be appropriate for the Council to make also an allowance for the replacement of future losses of employment space that may be developed for other non-employment uses over the Plan period. Where such an allowance is factored into future employment space needs, it seeks to ensure that sufficient space is provided to account for employment space that could be lost moving forward. It is intended, therefore, to provide some protection against the erosion of employment space over the Plan period. This is particularly important when de-designation of employment land is proposed; and

⁹ See LSH 'Record First Quarter For Industrial Take-Up' (Available at: <https://www.lsh.co.uk/explore/research-and-views/research/2021/may/record-first-quarter-for-industrial-take-up?listing=true>)

¹⁰ See Savills 'The logistics market in the West Midlands' (Available at: https://www.savills.co.uk/research_articles/229130/316120-0)

¹¹ See Knight Frank 'Midlands Logistics & Industrial Market Insight Report 2021 Mid-Year Review' (Available at: <https://content.knightfrank.com/research/489/documents/en/logic-midlands-2021-mid-year-review-8296.pdf>)

- Finally, a flexibility allowance is also attributable to factor in delays in development sites coming forward to ensure that the commercial activity will not be distracted across the market.

3.22 Synthesising the above, there is a clear need to review the Stage 1 EDNA, and the assumptions made therein, to ensure that the Local Plan Review is ‘*underpinned by relevant and up-to-date evidence*’ (Para 31, NPPF). At present, Richborough considers that the needs of strategic B8 logistics are underplayed. These trends have been accelerated exponentially over the past 18 months or so. Given the very large land take typically required by logistics operators, this will have a disproportionate impact on the overall need. Notwithstanding the above, it is important to note that Richborough reserves the right to provide further independent employment evidence to substantiate the above position at the Regulation 19 stage of the Local Plan Review.

Addressing the general employment needs of the FEMA

3.23 In addition to the above, alongside addressing the Council’s own employment needs, the NPPF is clear that plans are required to contain strategic policies which should, as a minimum, provide for the employment needs that cannot be met within neighbouring areas (Para 11b). In addition to this, as required by the NPPF, LPAs are under a duty to cooperate [DtC] with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries (Para 24). Indeed, for Local Plans to be found ‘sound’, they must demonstrate that they are based on “*effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred*” (Para 35c).

3.24 It is noted that the Stage 1 EDNA concluded that the Council falls within the South Staffordshire FEMA, which comprises South Staffordshire, Wolverhampton, Walsall, Dudley and Cannock Chase. Richborough notes that across the FEMA each of the constituent authorities is currently preparing their respective Local Plans and associated evidence. In terms of meeting the needs of the FEMA, Richborough has significant concerns regarding the fragmented approach currently being progressed, as each of the authorities is generally seeking to address their own needs in relative isolation. Fundamentally, this approach does not align with the NPPF (Para 35c) and runs the risk of not meeting the FEMAs employment needs and comprising economic growth across the area.

3.25 In this context, as a part of Cannock Chase’s recent consultation on the ‘Cannock Chase District Local Plan Preferred Options (February 2021)’, the Council set out their proposed policy approach for employment land which seeks to allocate c.50 ha of employment land (Policy SO4.2: Provision for New Employment Uses). This was underpinned by the ‘Cannock Chase Economic Development Needs Assessment Final Report (April 2019)’, which recommended that Cannock Chase District’s B-Class employment land need comprised a range of 30 ha to 67 ha between 2018 and 2036, and between 33 ha and 74 ha to 2038.

3.26 It is noted that their more recent ‘Cannock Chase Economic Development Needs Assessment Covid-19 Update (December 2020)’ updated this recommendation to 48 - 66 ha net between 2018 and 2038 and updated the split from 25% for office and 75% for light and general industrial and distribution to 20%/80% to reflect the ongoing strength in the logistics market, the increased take-up of industrial land and the much stronger job growth projections in B8-based sectors compared to office. Importantly, Cannock Chase’s proposed approach would ensure that it would meet its own employment needs and it has not identified a need for other authorities within the FEMA to assist in meeting its needs.

3.27 Conversely, as the Council will be aware, the BCAs have identified that they would not be able to meet c.210 ha of their employment land need up to 2039. It should also be noted that this level of unmet need, established through the ‘Black Country Economic Development Needs

Assessment (EDNA) Update (August 2021)', is markedly lower than the c.537 ha shortfall established in the 'Black Country Economic Development Needs Assessment – Stage 1 Report (May 2017)'. This is because the latter EDNA no longer aligns with the additional c.251 ha of employment land growth required by the 'Black Country Strategic Economic Plan 'Made in the Black Country: Sold around the World' (March 2014) ("the SEP"). An approach that Richborough disagrees with as it disregards the guidance within the PPG.¹²

- 3.28 In any event, it is noted that the PO acknowledges this unmet need (Para 4.55), and goes on to state that the c.19 ha oversupply – increasing further with the WMI – in South Staffordshire could contribute towards meeting the future employment land requirements of the FEMA, in particular, some of the BCAs gap given the existing strong policy links (Para 8.14). Indeed, the Council's Stage 2 EDNA also recognises the emerging issue in the Black Country (Para 2.12). However, the PO states that *"the exact amount of the oversupply to be attributed to their unmet needs will need to be agreed through a Statement of Common Ground"* (Para 4.57).
- 3.29 In this regard, notwithstanding Richborough's comments on the Council's Stage 1 EDNA above, it is important to note that Richborough welcomes the Council's commitment to contributing its c.19 ha identified surplus and part of the WMI to addressing the BCAs needs (Para 4.57). However, whilst the Council could make provision for its c.19 ha of oversupply to meet the needs of the BCAs, it is not necessarily within the Council's gift to apportion the WMI to neighbouring authorities as it sees fit. As acknowledged by the Stage 2 EDNA (Figure 4.3) and Topic Paper (Para 3.18), the WMI will play a regional role. Indeed, as the BCAs 'West Midlands Strategic Rail Freight Interchange Employment Issues Response Paper – Whose need will the SRFI serve? (February 2021)' ("the SRFI study") has shown that it would serve c.67 ha of the Black Country's employment needs when excluding South Staffordshire – see Figure 3 below. Therefore, as shown below, only c.5 ha of the WMI would be to meet the needs of South Staffordshire, therefore raising its purported oversupply to c.24 ha.

¹² PPG IDs: 2a-026 and 2a-032

Figure 3 Distribution of WMI employment land

Table 5 Distribution of total land share (net additional plus displacement)

	Net additional Share ha	Displacement Share ha	Total Share ha
South Staffordshire	3	1	5
Dudley	13	0	14
Sandwell	17	2	18
Walsall	17	2	19
Wolverhampton	14	2	16
Black Country market total	65	7	72
Birmingham	45	8	53
Cannock Chase	6	4	10
Lichfield	4	4	8
Solihull	13	1	13
Bromsgrove	8	0	8
Redditch	0	1	1
Wyre Forest	5	0	5
Birmingham market total	80	18	98
Newcastle-under-Lyme	0	4	4
Stoke-on-Trent	0	7	7
East Staffordshire	0	8	8
Stafford	0	3	3
Staffordshire Moorlands	0	0	0
	145	48	193

Source: VOA, ONS and Stantec analysis

Source: Table 5, West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve?

- 3.30 Even if it were accepted that the Council could distribute some of the employment land arising from the WMI to other authorities, there would still be an acute unmet need for employment land within the BCAs. The BCAs latest EDNA, drawing on the SRFI Study, sets out potential contributions from outside of the Black Country, comprising the c.19 ha from the Council, between c.72-94¹³ ha from the WMI and c.30 ha from Shropshire (Figure 4.3, Black Country Economic Development Needs Assessment (EDNA) Update (August 2021)). Despite this, there would still be an undersupply of between 91-111 ha – or between 16-21% of the BCAs employment needs – arising in the Black Country up to 2039; albeit, there is a cogent argument that the level of unmet need is higher when considering the Black Country SEPs vision.
- 3.31 However, despite this context, there is no coherent strategic approach to addressing these needs. As noted above, Cannock Chase is proposing to address its own employment needs and is making no provision for the unmet employment land needs of the BCAs as their EDNA does not envisage that Cannock Chase will assist in meeting the unmet needs of the BCAs as “*South Staffordshire District is expected to play a more significant role in this*” (Para 3.121).
- 3.32 Whilst historically the Council has considered that it is not for South Staffordshire to meet the full shortfall in the Black Country as Sandwell falls outside of the FEMA (Para 2.20, Stage 1 EDNA), the BCAs operate as a whole for plan-making purposes, and the scale of the BCAs unmet need is such that Richborough considers that there is a cogent argument for the Council to accommodate further employment growth within the District, as it is unlikely that this could be accommodated elsewhere within the FEMA.

¹³ This is an assumption made by the BCAs that the authorities within the Stoke on Trent market area are less likely to seek a contribution from the site, potentially providing some 22ha of B8 land that could be attributed towards meeting Black Country B8 needs (Para 4.5, Employment land technical paper (July 2021)) – this, however, has not been formally agreed at this time.

Addressing the demand for logistics across the FEMA

The Logistics Sector

- 3-33 The UK's logistics sector is an important provider of direct and indirect jobs and makes a significant and vital contribution to the UK economy. It also has a critical role in several other sectors including manufacturing and retail. However, its importance has been heightened in recent years by trends in the retail industry and particularly e-commerce, which have driven forward a significant increase in the demand for often large-scale logistics floorspace in highly accessible locations. Indeed, Prologis¹⁴ found that online fulfilment required three times as much warehousing space as store-based fulfilment. However, it has also been driven by a change in how manufacturers distribute goods, as they also have a need for dedicated storage floor space.
- 3-34 In terms of jobs, as the demand for distribution warehouse property has increased this has led to higher employment levels. Importantly, logistics floorspace generates a range of high-quality employment opportunities, which are often underestimated in terms of number and quality and have wages above the national average.¹⁵ Indeed, it is estimated that c.2.2 million people – or 8% of the UK workforce – are employed in logistics in the UK¹⁶. In this context, the logistics sector is approximate in employment terms to the UK's construction industry. Crucially, in order to maximise the economic potential of the logistics sector, it is essential to provide the appropriate accommodation and sites to deliver the required accommodation.
- 3-35 Richborough considers that the West Midlands is well-placed to meet the demand for distribution, particularly given the strong existing manufacturing base across the region. The region benefits from excellent access to the SRN, with access to the M1, M6, M42, M54, and A5, which means that a significant proportion of the UK population can be reached within c.4 hours. Indeed, this is recognised in the Council's Stage 1 EDNA (Pg. 58). Moreover, the West Midlands is home to the 'Golden Triangle' of logistics activity, which is served by the M1, M42 and M6 motorways. The region has seen major expansion to existing logistics and distribution facilities in recent years, with several SRFIs now serving the region, including DIRFT (J18, M1); Hams Hall (J9, M42); Birch Coppice (J10, M42); and the East Midlands Gateway (J24, M1). In addition, and as the Council will be aware, the WMI has been consented recently. The region also has particularly high concentrations of population in urban areas, such as Birmingham, Coventry and the Black Country. As a result, there is a strong demand for logistics sites located in close proximity to these urban areas to meet also demand for 'last-mile distribution' operations. This demand applies equally in respect of South Staffordshire, as confirmed in the Stage 1 EDNA (Pg. 58).
- 3-36 It is the access to the SRN and SRFIs, alongside the high level of manufacturing and 'last-mile distribution' demand within the region, that plays a significant role in supporting the economy of the sub-region as a strategic freight corridor and area of focus for demand for companies seeking to serve it. However, as a result of this demand from the logistics and manufacturing sectors and despite increasing supply through speculative development, the region has seen high levels of take-up, which has resulted in a critical undersupply of floor space.
- 3-37 Although there has been a number of speculative developments over the last few years, particularly in Cannock Chase along the A5/M6 Toll Corridor which demonstrates a high degree of confidence in the FEMA, research indicates there is only 0.91 years' worth of supply in the region¹⁰ and availability has reached critical levels. Moreover, as indicated above, the supply is

¹⁴ Pg. 4, Inside the Global Supply Chain: E-Commerce and a New Demand Model for Logistics Real Estate, Prologis (July 2014)

¹⁵ Pg. 14, Delivering The Goods: The economic impact of the UK, logistics sector, British Property Federation (December 2015).

¹⁶ Understanding Skills and Performance Challenges in the Logistics Sector, UK Commission for Employment and Skills, (October 2014)

not evenly distributed, with a chronic lack of supply in the Black Country, as well as Birmingham and Solihull, which will place additional pressures on areas such as South Staffordshire to meet these demands. In essence, there is an acute shortage of premises in the region, particularly in relation to high quality strategic sized sites (e.g. over 25 ha) in prime locations, despite a growing appetite for land able to accommodate strategic scale units (over 100,000 sq. ft).

- 3.38 In order to maximise the economic potential of the logistics sector, it is therefore critical that a FEMA-wide approach to ensuring additional, well-located sites, which are capable of accommodating larger units, are brought forward through the respective Local Plan Reviews to help meet demand and deliver high-quality floor space, is taken by the Council and other authorities within the FEMA.

Meeting the FEMA’s Logistics Needs

- 3.39 The Government requires LPAs to help create the conditions in which businesses can invest, expand and adapt. To inform and help underpin the resulting local plan policies and decisions, LPAs have long been required to produce Employment Land Reviews. As a part of this, the NPPF explicitly requires that *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for...storage and distribution operations at a variety of scales and in suitably accessible locations”* (Para 83). The PPG also recognises that the logistics industry has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land):

“Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.” (PPG ID: 2a-031)

- 3.40 The PPG¹⁷ indicates that this assessment can be informed by engagement with logistics occupiers, analysis of market signals and economic forecasts; engagement with LEPs and their plans and strategies, including economic priorities within Local Industrial Strategies. Whilst it is noted that the Stage 1 EDNA has considered the need for logistics uses separately from other B-uses within its assessment of need, this assessed the needs arising within South Staffordshire, i.e. based on forecast GVA growth and completions trends for the local authority area. However, there is an inherent limitation to this approach, since functioning property markets (and the business needs arising from this) typically operate beyond local authority boundaries. Accordingly, the PPG identifies that:

“Functional economic market areas can overlap several administrative areas so strategic policy-making authorities may have to carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area.” (PPG ID: 2a-025)

- 3.41 The PPG is clear that only once this evidence has been compiled, *“strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).”*¹⁸ Based on Richborough’s review of the Stage 1 and Stage 2 EDNAs and the Councils’ wider evidence base, we see no evidence that such an assessment has been undertaken, either to establish the extent of the appropriate logistics market area nor the scale of needs across the

¹⁷ PPG ID: 3-007

¹⁸ PPG ID: 2a-031

appropriate market area nor to objectively understand the most appropriate locations for meeting these needs.

- 3.42 Therefore, in terms of planning positively for strategic B8, Richborough considers that the Council and other FEMA (or wider) authorities should explore whether the current FEMA aligns with the employment and business needs within different market segments, or whether an alternative market area might be necessary to address logistics needs. In addition to this, the Council should consider other approaches to estimating strategic logistics requirements, such as producing estimates based on the forecast growth of freight and the replacement of out-of-date stock.¹⁹ Consequently, drawing on this evidence, the Council must ensure that there is a sufficient supply of allocations to meet these needs within its area.

Conclusion

- 3.43 Richborough considers that the Council’s proposed employment policy approach, set out in emerging Policy DS3 (The Spatial Strategy to 2038) of the PO, is not underpinned by robust evidence. The employment need set out in the Council’s Stage 1 EDNA is now markedly out-of-date, and does not include any meaningful allowance for the implications of Covid-19 and Brexit on strategic, big box logistics which are seriously under-represented in the past trends data by virtue of the assessment being undertaken in 2018. Moreover, the job growth scenario relies on ambient economic projections which fail to consider the implications of strategic employment developments such as the WML. In addition to this, the Council’s ad-hoc approach to addressing the unmet employment needs of the BCAs fails to grapple with the necessary strategic FEMA-wide approach needed to meaningfully deal with this matter. In all likelihood, Richborough considers that there is a cogent argument for the Council to accommodate further employment growth within the District, as it is unlikely that this could be accommodated elsewhere within the FEMA.
- 3.44 Furthermore, Richborough also considers that the need for storage and distribution has been essentially overlooked by the emerging Local Plan Review, contrary to the NPPF’s requirement for planning policies to accommodate the bespoke locational requirements for storage and distribution operations of all scales, and the PPG’s associated guidance in this regard. To remedy this, Richborough considers that the Council must therefore now seek to properly assess and have regard to the requirements for storage and distribution operations of all scales and in suitably accessible locations in line with NPPF, taking account of the relevant FEMA. This requires a full assessment of strategic distribution needs and appraising all the available supply options to accommodate those needs, once identified. This is critical in order for the Local Plan to accord with paragraphs 32 and 83 of the NPPF and the guidance within the PPG.
- 3.45 Richborough welcome the intention of the Council to prepare an updated EDNA prior to the Regulation 19 version of the emerging Plan. Without needing to delay the Plan’s timetable, this provides them with the opportunity to look again at, and consult on, the quantum and location of future employment development before the emerging Plan is submitted for examination.

Question 10: Do you support the proposed allocation in Policy SA7? Yes/No

- 3.46 The NPPF is clear that “*once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified*” (Para 140). Paragraph 141 of the NPPF then sets out a sequential approach necessary prior to concluding exceptional circumstances justify the release of Green Belt. However, the NPPF is also clear that policies should also “*recognise and address the specific locational requirements of different sectors*”,

¹⁹ Based on a 30-year ‘warehousing life circle’ assumption.

including (*inter alia*) “for storage and distribution operations at a variety of scales and in suitably accessible locations” (Para 83).

- 3.47 As concluded by the granting of the WMI DCO, the “national and regional need for the proposed development outweighs any harm” and “the very special circumstances needed to justify a grant of development consent have been demonstrated” (Para 68, Secretary of State’s Decision Letter). Such an approach has reaffirmed by the Secretary of State [SoS] in two recent planning appeal decisions,²⁰ in which the SoS concluded that, amongst other things, the economic benefits associated with development proposals and acute need for regional and sub-regional need for logistics floorspace in those areas constituted the ‘very special circumstances’ required by the NPPF. Although the ‘very special circumstances’ (Para 140, NPPF) test is separate from the ‘exceptional circumstances’ test (Para 147, NPPF), it is entirely reasonable to conclude that had the development proposals come forward as a part of the emerging Local Plan Review process, that the cogent need for such a development in that location would have constituted the exceptional circumstances necessary to remove the site from the Green Belt.
- 3.48 In this regard, as recognised by the Council in the PO, the WMI is already consented through the DCO process (Para 4.56). As such, Richborough supports the Council’s proposed allocation in draft Policy SA7. It is entirely logical to rationalise the consented WMI within the emerging Local Plan Review and remove it from the Green Belt. Indeed, the adjoining Four Ashes Industrial Estate is already inset from the Green Belt, and such an approach would align with this.

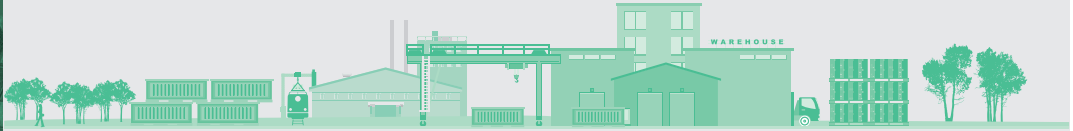
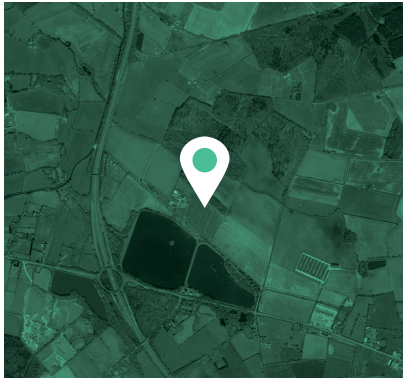
²⁰ Appeal References: 3253242 and 3265899

Appendix 1 Economic Benefits Infographic

Gailey Lea, South Staffordshire

The proposed development will provide employment opportunities to nearby areas and would generate a range of direct and indirect economic impacts supporting future growth across the FEMA.

The proposal



Up to **2.455m sq ft** of employment floorspace
(Use class B8)

Other details:
With associated parking and infrastructure

Construction benefits



£135m
Construction value
(excluding infrastructure)



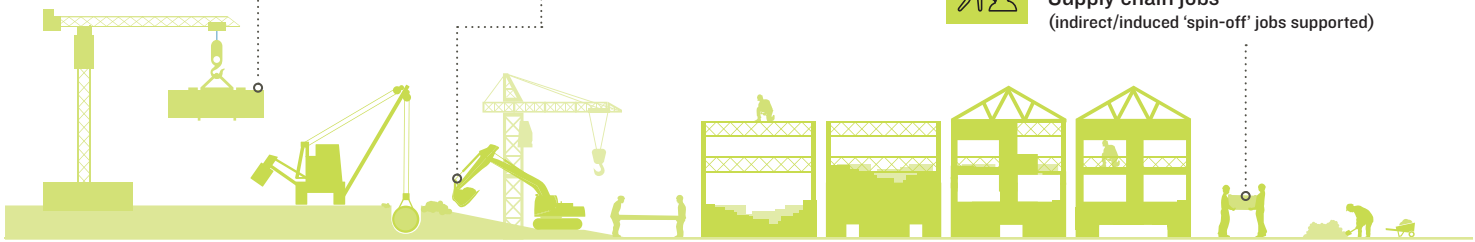
£27m GVA
Economic output
(additional GVA p.a.)



172 Direct FTE jobs p.a.
Construction jobs
(over an estimated 6 year build period)



191 FTE Jobs
Supply chain jobs
(indirect/induced 'spin-off' jobs supported)



Operational and expenditure benefits



2,521 Direct FTE jobs
(Net additional jobs supported)



731 FTE Supply chain jobs
(Indirect/Induced jobs within Cheshire East)



£107m
Economic output
(additional GVA p.a.)



Local Authority revenue benefits



£5.5m
Business rate revenues
(p.a.)



