



# Employment Land Supply – Clarification Note

Newcastle-under Lyme – Local Plan (at  
Submission Stage)

December 2024

## Employment Land Supply Note of Clarification (04 December 2024)

### Background

- 1) The Council consulted on the Final Draft Local Plan, at Regulation 19 stage, from the 12 August until the 7 October 2024. Representations received to the consultation have asked for further information on the Council's Employment Land Supply. This note has been prepared as an addendum to the Plan Strategy Employment Topic Paper [ED032] to provide clarification on the Council's Employment Land Supply.

### The need for employment land

- 2) Section 6 of the Housing & Economic Needs Assessment Further Update (HNAU - 2024) presents an updated calculation of the need for employment land, accounting for the level of job growth now considered likely - following analysis of newer forecasts and the extra year of take-up data that has become available in the HNAU produced in March 2023.
- 3) The HNAU suggested that between 43.1ha and 83.0ha of employment land could be needed throughout the borough between 2023 and 2040.
- 4) Paragraph 6.65 of the HNAU is especially pertinent to the approach advocated in Policy PSD1 of the Final Draft Local Plan. This states that:

*'In a technical sense, provision at the lower end of the range (43.1ha) would directly align with the standard method, accommodating the jobs that could be supported mainly through changing behaviours where this report's modelling suggests that this scenario would bring limited growth in the working age population. The forecasts introduced in section 5 suggest that more jobs could be reasonably expected, at an average rate of 237 jobs per annum, and this would not only require the provision of 400 dwellings per annum – to sufficiently grow the labour force – but could also require around 48.2ha of employment land. Either of these scenarios would though slow the recent rate of take-up, with provision towards the upper end of this range (63.3-83.0ha) more likely to mitigate this risk without necessarily creating more jobs than implied by the forecast given that less than half as many were created during the years in which this take-up has occurred'*

- 5) It is also important to recognise that the growing need for land is reflected in its ongoing take-up, where it has been available and of sufficient quality. A significant proportion of the remaining supply (evaluated more as part of Table 1 below) is also expected to be taken up in the coming years. In considering this, the extra year of take-up rate data has suggested (referring to para 6.13 of the HNAU 2024) that the *'relatively strong take-up of industrial land in this extra year serves to increase both of the previously reported averages'* over the five & ten-year periods.
- 6) Collectively, this strongly indicates that that additional employment land is required to meet the full scale of potential need over the remainder of the plan period.

### Existing & future supply

- 7) Having reviewed data in the HENA and to avoid double-counting, the total existing employment land supply (i.e. exclusive of those allocated in the Final Draft Local Plan and the strategic employment sites AB2 & KL15) equates to a figure of 29.66ha, with the details of the constituent sites and their respective site areas presented in Table 1 below:

*Table 1: Existing employment land supply*

Site	Area (Ha)	Notes
Silverdale Business Park	0.3	Extant permission
Chatterley Valley, West of Mainline	26.5	Development anticipated to imminently commence
Linley Road, Kidsgrove	2.86	In active use for vehicle storage
<b>TOTAL</b>	<b>29.66</b>	

- 8) Table 2 (below) highlights the position when the draft allocations in the Final Draft Local Plan are added to this base information:

*Table 2: Total Employment Land Supply*

Site	Area (Ha)	Notes
Rowhurst Close, Chesterton (CT20)	8.88	
Keele University Science Park (Phase 3 – KL13)	11	
Chatterley Valley. East of Mainline (BW1)	6.4	
Land South of A525 Keele (KL15)	13	Strategic employment site
Land at Junction16, M6 (AB2)	80	Strategic employment site
<b>TOTAL</b>	<b>119.28ha</b>	Excluding the strategic employment sites = 26.28ha
<i>Existing employment land supply (i.e. those in Table 1)</i>	<i>29.66ha</i>	
<b>TOTAL EMPLOYMENT LAND SUPPLY (Gross)</b>	<b>148.94ha</b>	

- 9) The excess beyond the minimum figure highlighted within PSD1 'Overall Development Strategy' is acknowledged. However, it is important to recognise the proposals for AB2 (by far the largest scheme in hectares) are intended to include a significant element of green infrastructure. This consequently has a major impact on what the net developable area will be and explains that the site includes 22ha of employment land in accordance with Policy AB2 'Land at Junction 16 of the M6.

- 10) The rationale for this is further justified on the basis of representations received from the site promoters for AB2 (Indurent Strategic Land) to the Final Draft Local Plan Consultation (ref: NULLP988). Both in the covering representation & an accompanying appendix (Appendix 9: Green Infrastructure Strategy) it is stated that an extensive Green Infrastructure offer will encompass approximately 29ha which equates to 37% of the total site area, and with on-plot provision that Green Infrastructure would increase to approximately 42%.
- 11) The site is allocated for strategic employment development to provide 220,000 sq m floorspace. Applying the ratio (40%) assumed in parts of the Councils evidence base would suggest that a site area of 55ha would typically be needed to deliver 220,000 sq m of floorspace whilst also leaving room for access, drainage, Green Infrastructure, yard space, and so on. Using a ratio of 35% suggests a site area of 63ha would be needed to deliver 220,000 sq m of floorspace.
- 12) Compared to the above figures, the proposed site area of circa 80ha will provide a number of hectares of extra land over what might typically be needed to deliver 220,000 sq m of floorspace. The extra Green Belt land is anticipated to be used for GI, which would be notably above usual expectations. Allocating less land it is felt would be counter-productive, encouraging denser development, more impactful, and offering less by way of mitigation.
- 13) The impact of removing land from the Green Belt will be further offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land on and off site.

### Conclusions

- 14) The approach in Policy PSD1 of the Final Draft Local Plan which states that...'Provision will be made for a minimum of 63 hectares of employment land over the Plan period 2020 – 2040' is considered to be robust, justified and the minimum sufficient to ensure a resilience in supply.
- 15) The existing employment land supply has qualitative and quantitative deficiencies that need to be addressed in the emerging Local Plan
- 16) Those sites highlighted for allocation reflect those that are considered to best address these deficiencies as well as satisfying the demands of growing sectors and the wider sub-region
- 17) Timeframes for delivery are also such that particularly for the strategic employment sites that they are unlikely to come forward before the turn of the decade at the earliest. By the nature of these schemes, such as the Keele University expansion, they will also address very specific requirements that help consolidate the economic advantages of proximity to a higher education institution.
- 18) Overall, the sites identified present an appropriate mix of scale, location and attributes to satisfy the issues highlighted in the evidence base & the strategic vision and objectives of the Local Plan.