

Newcastle under Lyme Local Plan Examination in Public

Indurent Management Ltd (“Indurent”)

Hearing Statement: Matter 2 Vision and Objectives, the Spatial Strategy, and the Site Selection Process

Planning Prospects Ltd (“PPL”)

28 April 2025

Introduction

Indurent¹ are promoting land south east of M6 Junction 16 for strategic employment development which land is allocated in the emerging Local Plan (Policies PSD1 and AB2). Indurent have an extensive track record for delivery of such sites and therefore strongly support this allocation. Indurent have made extensive representations at the Regulation 19 consultation stage (and all preceding stages) proposing modifications to Policy AB2 so as to ensure it is sound, and similarly to Policy PSD1.

There is a very strong unmet market demand for large scale employment development in this location and accordingly, Indurent have submitted an application for outline planning permission for development of the land of the form anticipated by the emerging Plan.

In this context the comments made at this stage on behalf of Indurent primarily relate to Matter 9 (Employment Policies and Allocations). A separate Statement has been prepared and submitted providing detailed observations in relation to the Questions associated with Matter 9.

There is however some overlap with Matter 2, and further observations are made here in that context, also having regard to the objections made by Indurent at the Regulation 19 stage in relation to Policies PSD1 and PSD4.

Questions

2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

The availability of a wide range of Submission documents that speak to this question – for example in terms of the assessment of strategic employment sites, housing and employment land availability, urban capacity, site selection, and Green Belt – is noted. This material deals extensively with the approach to site selection, including for employment sites, and shows this to be a robust and comprehensive process.

Further detailed analysis of this matter is set out in the Alternative Site Assessment (“ASA”, Savills, April 2025²) prepared for Indurent in support of its planning application. It considers the availability of alternative sites to meet this requirement, i.e. for large scale strategic employment land well related to the motorway and capable of meeting the identified need in this market. It examines first the FEMA plus Stafford Borough, and second the additional administrative area of CEC. The latter is included for completeness – but notably it is not considered to represent part of the same property market area that should form the focal point of this exercise.

The ASA follows a systematic approach to arrive at a potential shortlist of two sites (including site AB2) in the FEMA plus Stafford, and a further two in Cheshire East. Shortcomings are identified with each of the additional locations, none perform as well or offer the same function as site AB2, and even if all were to be considered together there would still be a shortfall against

¹ Formerly St Modwen. Indurent was formed in 2024 following a merger between St. Modwen Logistics and Industrials REIT.

² The full document to be available via the Council’s online portal.

identified need. It remains the case that site AB2 is the optimal location for strategic employment development of this nature in Newcastle-under-Lyme, but also in the wider FEMA, and indeed including Stafford Borough and Cheshire East as well. There are no realistic options that could meet the need as well and as fully as this site. The few potential other sites might contribute quantitatively to meeting the need, but there would still remain a need, and no true alternative exists.

2.7 Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?

Representations made by Indurent at the Regulation 19 stage referred to the need for Policy PSD1 to express more clearly the requirement for employment land including in particular strategic employment land, and suggested modifications in that regard. Those representations also referred to the need for greater clarity in Policy PSD4 and its approach to open countryside. The comments made in those representations remain valid and should be addressed.