

# Newcastle under Lyme Local Plan Examination in Public

## Indurent Management Ltd (“Indurent”)

### Hearing Statement: Matter 9 Employment Policies and Allocations

## Planning Prospects Ltd (“PPL”)

28 April 2025

### Introduction

Indurent<sup>1</sup> are promoting land south east of M6 Junction 16 for strategic employment development which is allocated in the emerging Local Plan (Policy 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.

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 the development of the land in a form anticipated by Policy AB2. Key features, drawings and images from that application are provided in the brief Vision Document at Appendix 1.

The comments made here on behalf of Indurent in response to the Inspector’s Matter 9 questions are provided against that background, and in the context of the Statement of Common Ground (SOCG) agreed between Indurent and the Council in relation to Policy AB2 (document reference EX/SCG/05).

### Questions

*9.3 In relation to strategic employment needs is the amount of land allocated for strategic employment needs justified and consistent with national policy?*

The amount of strategic employment land is justified through extensive and dedicated Strategic Employment Sites Assessments prepared in April 2023 (ref. ED002a) and updated in June 2024 (ref. ED002) by specialist independent consultants for the Council, which dovetail with the separately produced HENA reports prepared for the Council, and are informed by direct consultation with those promoting sites for development.

The conclusions presented in document ED002 (paragraph 12.36) are endorsed and state: *“...we are of the considered professional opinion that there is a need for two Strategic Sites in the new local plan. They should be AB2 and KL15 [at Keele University]. They remain a viable proposition. The future development of these sites will provide considerable added value to the borough, the FEMA and the West Midlands region, with added value to adjacent areas.”*

Further detailed analysis of this matter is set out in the Industrial & Logistics Needs Assessment (Savills, April 2025<sup>2</sup>) which has been provided as part of the evidence base for the planning

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

<sup>2</sup> The full document to be available via the Council’s online portal. The Executive Summary is provided here at Appendix 3. It builds on and updates the very extensive evidence previously submitted to the Council through various rounds of consultation on the emerging Plan. For example, the Inspector will have seen that Indurent’s representations to the Regulation 19 consultation event included (Appendix 2) the *Big Box Market Statement Update* (JLL, December 2021); (Appendix 3) *Supporting Statement on Industrial and Logistics Need* (Savills, August 2023); and (Appendix 8) *Industrial & Logistics Needs Assessment Addendum* (Savills, October 2024). Collectively this material speaks powerfully and positively to the matters raised by Inspector’s question 9.3.

application submitted by Indurent on the AB2 allocation. This examines the market in the Borough but also, critically, the FEMA<sup>3</sup>, as well as a broader sub-regional area comprising the FEMA plus the Stafford Borough Council administrative area. It explains the nature and extent of the requirement, the importance of meeting it, and the ideal positioning of the AB2 site in helping to meet it. It identifies the alignment of such development with the local economic strategy.

The approach taken in this work includes an assessment of the level of need identified within the evidence base documents of the constituent authorities, setting that alongside additional analysis undertaken to sensitivity check that work and allow for components of the requirement that would otherwise be overlooked. This includes an allowance for “suppressed demand”, i.e. demand that has been lost from the FEMA historically due to supply constraints. In this way it yields a range of estimates of the requirement. For the FEMA the upper end of the range from the Councils’ evidence base coincides with the lower end of the range in the Indurent work at a level which very clearly is supportive of strategic allocations of the type advanced in the Plan. It plainly evidences therefore that the local plan target ought to be treated as a minimum figure.

In national policy terms<sup>4</sup> there is an expectation (paragraphs 20 – 23) that strategic policies should make sufficient provision for employment development and address objectively assessed needs, including, where relevant, cross-boundary issues. It includes (paragraph 85) that: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*

It goes on to note (paragraph 86) that planning policies should set out a “clear strategy” which positively and proactively encourages sustainable economic growth, having regard to relevant strategies and policies; identify strategic sites for local and inward investment to match the strategy and meet anticipated needs; and be flexible enough to accommodate unanticipated needs and respond rapidly to changes in economic circumstances.

Paragraph 87 provides that planning policies, *“...should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”*

The Plan follows closely the approach prescribed by national policy. It is informed by an extensive evidence base which identifies strategic needs (i.e. including cross-boundary needs) for employment land and positively creates a framework to address that, noting that one of the weaknesses of this area has been a failure to capitalise on that (strategic employment land) market, despite the presence of the M6 as a key element of national infrastructure which operates as a movement corridor, but also a substantial economic opportunity of great value. Unhappily since this opportunity has not been fully seized over recent years, there is evidence of investment bypassing the area over an extended period.

The Plan therefore rightly seeks to redress this and identifies strategic sites in accordance with the local economic strategy and at a scale that will allow for flexibility and change over the plan period. In so doing it directly addresses the locational requirements of those sectors specifically referenced by national policy by allocating land at Keele (knowledge and high technology based industries) and Junction 16 (storage and distribution operations).

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<sup>3</sup> The Functional Economic Market Area, or the spatial level at which local economies and markets actually operate, here comprising the administrative areas of Newcastle-under-Lyme and Stoke-on-Trent, and the spatial building block referenced in PPG for employment land need assessment.

<sup>4</sup> NPPF, December 2023

A further important point is that whilst the quantity of strategic employment land allocated is important, equal importance should be attached to the quality of that land, in terms of its location and scale.

In terms of location, as recommended by the Plan's Evidence Base (discussed above) the Plan identifies two strategic sites intended to perform two distinct functions. Where the purpose is to promote science, research and innovation the proposed allocation is rightly located close to the University. Where the purpose is to provide the sub-regional logistics offer currently absent from the Borough, the proposed allocation is positioned at the strategically crucial junction of the M6 and A500.<sup>5</sup> Allocations of comparable scale made in other locations – further away from either location – would be qualitatively inferior and serve these purposes less well.

The scale of allocation required is something that has been examined extensively through representations made by Indurent to the Plan during the consultation process (see footnote 2). A key strand of this is that occupiers with the largest space requirements have not, for some time, been able to find accommodation in the FEMA – such that this segment of the market has simply bypassed this area and directed much needed economic investment elsewhere. This point is addressed in detail in the Industrial & Logistics Needs Assessment submitted to support the planning application. For example, this shows there is currently no availability of units in the FEMA in the largest (46,500 sq m +) category and no availability in Newcastle-under-Lyme at all in the “very large” (23,200 – 46,500 sq m) category. Whilst there is some availability in the “large” (9,300 – 23,200 sq m) category, this relates to a single, second hand building. It is important that land is allocated which is capable of accommodating multiple buildings at scale so requirements in that sector of the market can be met. Site AB2 offers that.

#### *9.4 Have these allocations had appropriate regard to the potential wider strategic impact of the development?*

The availability of a wide range of Submission and Examination documents that speak to this question – for example in terms of sustainability, duty to cooperate, flood risk, highways, habitats and transport – is noted. This material deals extensively with the potential wider strategic impact of the Plan including the proposed strategic employment land allocations.

It is noted that Cheshire East Council (CEC) maintain a strategic objection to the allocation of site AB2. This is a disappointing stance to take on the part of a neighbouring authority which has made such provision within its area and has therefore had the benefit of investment that might otherwise have been captured by Newcastle-under-Lyme. Two observations should be made in this regard.

First, and notwithstanding that this objection is maintained by CEC, the Supplementary Statement of Common Ground between Newcastle-under-Lyme and CEC (ref. EX/SCG/04) sets out a number of modifications to Policy AB2 requested by CEC in the event the allocation is retained. These seek increased robustness in proposed policy criteria around master-planning, highways, public transport and landscape and visual assessment. Indurent have no difficulties with these suggested modifications, save for considering that where reference is made to requiring “agreement” with CEC this should be changed to “consultation”. CEC are not the determining authority here and their role ought to be limited to consultee when considering their views to inform the shaping of the public transport solution for site AB2.

Second, it is not clear from the CEC representations to the emerging Plan (ID: NULLP1275 in ref. CD08) that they have considered the extensive evidence provided by Indurent (including for example as listed here at footnote 2), nor understood that the policy intention in the Plan includes to serve the wider sub-regional economy (Policy PSD1) with site AB2 expected (paragraph 5.3) to, “*perform a key strategic role in supporting sub-regional economic growth*”

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<sup>5</sup> Echoing the conclusion reached in the evidence base (Strategic Employment Sites Assessment Update ED002 paragraph 12.2) that, “The council needs to make sure they have a pipeline of new, *well-located* developments coming forward – or occupiers will go elsewhere” (emphasis added), also chapter 10 of that document which speaks to the quality of land available.

and (paragraph 13.12) to serve, “*the employment needs of the Borough and wider sub-region.*” This again underlines the importance of the FEMA and contributing to meeting needs at the spatial level at which local economies and markets actually operate. It is not clear that CEC have considered this.

In short it is considered that the Council’s evidence base attending to strategic matters and justifying the provision of strategic employment land is robust and is furthermore reinforced by the extensive material submitted by Indurent in support of its planning application. The latter provides the reader with a clear understanding of the requirement and the contribution of site AB2 to meeting the immediate need for such development.

*9.5 How were employment sites selected? What factors led to their allocation? Are they based on up-to-date evidence? Were they 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 2025<sup>6</sup>) 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 identified demand. 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.

*9.6 Are the sites allocated for employment sound, and in particular for each of the sites listed below:*

*AB2 Land at Junction 16 of the M6*

*a) Are the various requirements set out in the policy clear, justified and effective?*

As noted in the SOCG between Indurent and the Council (ref. EX/SCG/05) it is considered that the specific requirements of policy AB2 are appropriate and justified, subject to some limited observations made by Indurent through the Regulation 19 consultation and summarised in the SOCG (section 9.1 of and the appendix to that document). The response to Question 9.4 (above) acknowledges that some further modifications might be made if considered necessary by the Inspector.

*b) Have the site constraints been appropriately taken into account in the allocation of the site?*

As noted above (Question 9.5) the Council conducted a thorough site selection process and that involved an assessment of relevant site constraints, including for site AB2.

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<sup>6</sup> The full document to be available via the Council’s online portal.

Indurent have promoted site AB2 over an extended period and through the consultation process for the Plan have provided material to assess all relevant constraints. The SOCG notes (section 7.2) the agreement between the parties that the technical assessments undertaken by Indurent and provided through the consultation process on the emerging Plan have not identified any issues that would prevent the successful development of the Site.

The SOCG also notes (section 7.1) that further detailed technical analysis would be required to support a planning application. A full suite<sup>7</sup> of technical analysis has been completed and provided to support the planning application now submitted. This demonstrates a clear understanding of the constraints of the site and continues to demonstrate they can be adequately addressed through the development management process.

*c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?*

Indurent's evidence submitted through different stages of Plan consultation and now through a planning application shows that the floorspace allocation can successfully be delivered here whilst still incorporating generous provision of Green Infrastructure (the application proposes that strategic and on-plot landscaping will combine to dedicate at least 40% of the site as Green Infrastructure). Comments are provided above (Questions 9.4 and 9.6b) in relation to constraints and impacts but again a detailed assessment of all such matters is available through the planning application material if further reassurance is needed around any point.

*d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?*

The planning application builds upon evidence submitted through representations to the emerging Plan to show how development here can deliver the infrastructure (for example highways and access, drainage, green and social) required to support a scheme of the type anticipated by Policy AB2. A strategy is also in place to ensure that the utilities required to serve the site can adequately be provided through its development.

*e) Is there evidence that the development of the allocation is viable and developable during the plan period?*

Indurent is an experienced developer with a proven track record in bringing forward this type of development. Indurent is the successor organisation to St Modwen who brought forward extensive development locally, as well as regionally and nationally. Indurent's confidence and commitment in this regard in relation to site AB2 is expressed in the SOCG (sections 5 and 6) and through the submission of a planning application. The Council's evidence base (ref. ED002 and ED002a) provides further independent analysis to support Indurent's position that the development of site AB2 is viable.

*f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the Plan sound?*

Comments are provided above (Question 9.6a) in this regard. Indurent have no difficulty with the draft main modifications (ref. CD15) or the changes requested by CEC (ref. EX/SCG/04) subject to the observations made in relation to Question 9.4 (above).

*9.8 Taken together, does the Plan provide for an appropriate amount and range of employment sites to meet the needs of the Borough for the Plan period?*

Indurent does not express a view in relation to sites intended to address local employment need. In terms of sites intended to meet a strategic employment need it is considered that the

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<sup>7</sup> Application submission schedule provided at Appendix 2. Documents to be available via the Council's online portal.

Plan does make adequate provision, albeit the evidence points to this as being the minimum required.

As explained elsewhere in these representations the sites are well located to meet distinct needs centred around the University, and additionally the strategic road network. Site AB2 is ideally positioned and adequately scaled to contribute to meeting the need locally and sub-regionally for employment land capable of meeting the largest space requirements where currently there is no provision locally. It is eminently well suited to meeting this requirement, and deliverable. Without site AB2 it will remain that an important component of the strategic employment need and the requirements of some of the largest occupiers are not met in Newcastle-under-Lyme or indeed the wider FEMA, but rather this investment continues to bypass the area to the serious detriment of the local economy.

**APPENDIX 1**  
**Site AB2 Vision Document**



# /INDURENT

## Land Southeast of M6 Junction 16 Newcastle-under-Lyme

17022-SGP-XX-XX-IE-A-111501  
Vision Document

May 2025  
P03



# Illustrative Masterplan

## KEY:

- Development Plots
- Public Right of Way - Existing
- Public Right of Way - Diverted
- Public Right of Way - Proposed
- PRoW Access
- Vehicular Access
- Strategic Green / Blue Infrastructure
- Local Authority Boundary
- Proposed Mounding TBC





## Scheme Benefits

The key benefits to be delivered by the Scheme will include:

### Meeting the need for employment land:

- » Provision of strategic employment land to address a very clear and pressing unmet need at an ideally located site capitalising on the M6 and J16 as a crucial but under-utilised asset
- » Addressing a specific need for the provision of larger, high quality units
- » Delivering a critical element of the strategy of the emerging Plan

### Economic benefits:

- » On-site (gross, direct) construction jobs over construction period: **1,310**
- » On-site and off-site construction jobs for Newcastle-under-Lyme over construction period: **1,040**
- » On-site (gross, direct) operational jobs: **2,500 – 3,570**
- » On-site and off-site operational jobs for Newcastle-under-Lyme's residents: **1,620 – 2,170**
- » Gross Value Added ('GVA'): **£100.3m - £213.8m**
- » Total Business Rates per annum: **£6.0m - £6.3m**
- » Cumulative Business Rates income over 20 years: **£55.8m - £58.3m (Net Present Value)**
- » Additional "Social Value", e.g. from apprenticeships; education, advice and guidance; work experience; NHS savings; supporting local businesses: **£21.9m (Net Present Value)**

### Additional benefits:

- » Provision of a lorry park with (up to 200) spaces and driver amenities in an underserved area with high demand
- » Land identified for a training hub
- » A highways solution to meet the requirements of the Scheme but also provide additional benefits to the performance of J16
- » Enhancements to the surrounding public rights of way infrastructure, and strengthening of those existing links through the Site
- » An extensive network of recreational routes within the Site opening up public access
- » Strategic and on-plot landscaping to dedicate at least 40% of the Site as Green Infrastructure
- » Off-site additional landscaping
- » Biodiversity net gain of at least 10%
- » Reduced flood risk on and off-Site from the southern watercourse
- » Net benefits in health and wellbeing
- » Higher sustainability standards than required by current policy, also meeting or exceeding the standards of emerging policy









View from footpath north of A500 (view after 15 year growth of landscape planting)



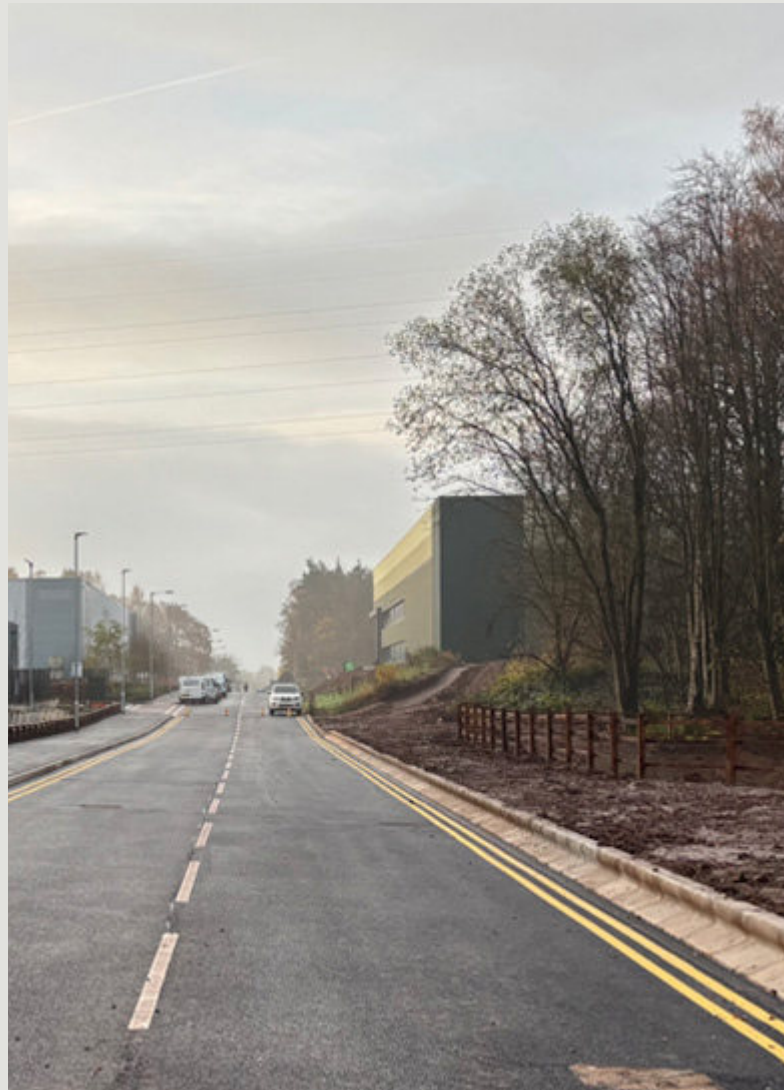
View from Park Lane (view after 15 year growth of landscape planting)



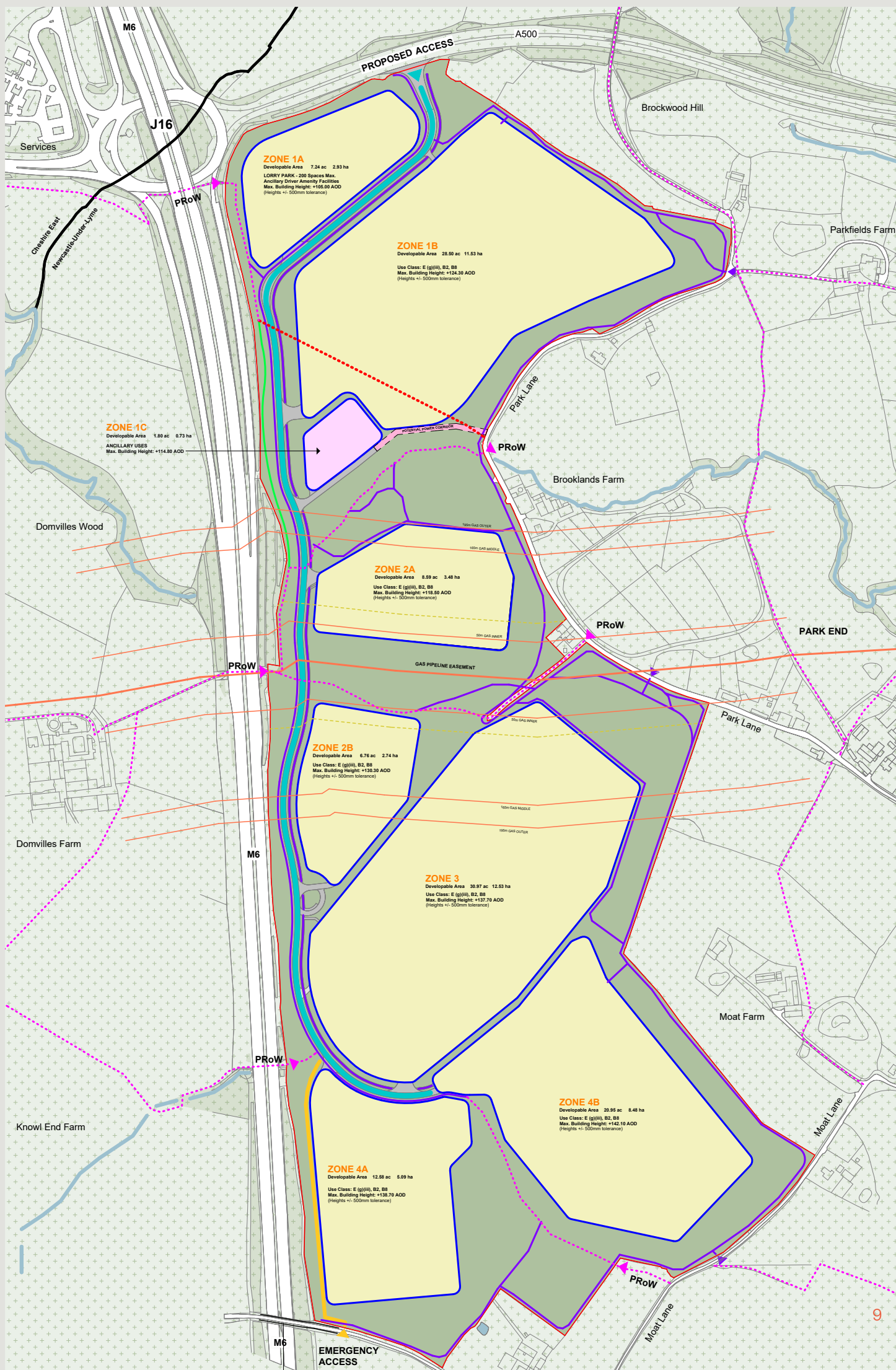




Indurent Typical Building Detail (below)  
Development Parameters Plan (overleaf)









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[stephengeorge.co.uk](http://stephengeorge.co.uk)

**APPENDIX 2**  
**Site AB2 Planning Application Submission Schedule**

Land Southeast of M6 Junction 16: Proposed Industrial & Logistics Development  
Schedule of Submitted Drawings and Reports - 30 April 2025 (1)

Proposal - Outline planning application for employment development, all matters reserved save for main point of access

Drawings

Number	Revision	Name	Scale	Author
Site / General				
105501- SGP- ZZ- XX-DR-A- 110001	P04	Site Location Plan	1:2500 @A1	SGP
105501- SGP- ZZ- XX-DR-A- 110000	P04	Existing Site Layout Plan (inc. PROW)	1:2500 @A1	SGP
Proposal				
105501- SGP- ZZ- XX-DR-A- 111001	P06	Development Parameters Plan	1:2500 @A1	SGP
7734-L-13	L	Landscape Strategy Plan	1:2500 @A1	FPCR
105501- SGP- ZZ- XX-DR-A- 111000	P05	Illustrative Masterplan	1:2500 @A1	SGP
Infrastructure				
105501- SGP- ZZ- XX-DR-A- 111002	P04	Access Strategy Plan	1:2500 @A1	SGP
02720-C1-C-0100	P01	Proposed Access - General Arrangement	1:1000 @ A1	PJA

Reports / Other

Reference	Revision	Name	Author
Planning			
		Application Form	Planning Prospects
		Certificate / Notices	Planning Prospects
		Covering Letter	Planning Prospects
		Schedule of Submitted Documents	Planning Prospects
		Payment	Indurent
Supporting			
		Planning Statement (including Design Review Statement and VSC)	Planning Prospects
		Statement of Community Involvement	Lexington
		Design and Access Statement (including Design Guide)	SGP
		Green Infrastructure Strategy	FPCR
		Lighting Strategy	MBA
		Minerals Resource Assessment	WA
		I & L Need Assessment (including Economic Benefits and Social Value)	Savills
		Alternative Site Assessment	Savills
		Sustainability Statement	Stantec
		Health Impact Assessment	Stantec
		Phase I Geo-Environmental Desk Study	PJA
		BNG Report	FPCR
		BNG Statutory Metric	FPCR
ES			
		ES Volume 1 - Text	
		1 Introduction	WA
		2 Site Description	WA
		3 Development Description	WA
		4 Approach and Scope of the EIA	WA
		5 Consideration of Alternatives	WA
		6 Landscape & Visual	FPCR
		7 Ecology & Nature Conservation	FPCR
		8 Archaeology & Heritage	Dalcour Maclaren
		9 Noise & Vibration	Resound
		10 Air Quality	AQC
		11 Transport	PJA
		12 Water Resources & Flood Risk	PJA
		13 Soils & Agricultural Land	WA
		14 Summary of Residual & Cumulative Effects	WA
		Statement of Expertise; Reference List; Glossary; Next Steps	WA
		ES Volume 2 - Appendices and Figures	Authors as above
		Appendix 1.1 Location Plan	
		Appendix 1.2 Parameters Plans	
		Appendix 1.3 Illustrative Masterplan	
		Appendix 4.1 Scoping Report	
		Appendix 4.2 Scoping Opinion	
		Appendix 6.1 Planning Policy	
		Appendix 6.2 Landscape and Visual Impact Assessment – Methodology and Assessment Criteria	
		Appendix 6.3 Arboricultural Assessment	
		Appendix 6.4 LVIA Figures	
		Appendix 6.5 Indicative landscape sections	
		Appendix 6.6 Visual Effect Tables	
		Appendix 6.7 Photomontages	
		Appendix 7.1 Preliminary Ecological Appraisal & Habitat Survey	
		Appendix 7.2 Badger Survey	
		Appendix 7.3 Breeding Bird Survey	
		Appendix 7.4 Great Crested Newt Survey	
		Appendix 7.5 Bat Survey	
		Appendix 7.6 Shadow Habitats Regulations Assessment	
		Appendix 8.1 Archaeological Desk Based Assessment for Land South East of M6 Junction 16, Staffordshire	
		Appendix 8.2 Geophysical Survey	
		Appendix 8.3 Land South East of M6 Junction 16, Staffordshire. Brook Farm, Historic Building Appraisal	
		Appendix 8.4 Land South East of M6 Junction 16 - Heritage Impact Assessment	
		Appendix 9.1 Introduction to Noise and Vibration	
		Appendix 9.2 Assessment Policy, Standards and Guidelines	
		Appendix 9.3 Environmental Noise Survey	
		Appendix 9.4 Construction Noise Assessment	
		Appendix 9.5 Operational Noise Assessment	
		Appendix 9.6 Noise and Vibration Figures	
		Appendix 10.1 Policy Context	
		Appendix 10.2 Planning Policy	
		Appendix 10.3 Summary of Consultation Undertaken to Date	
		Appendix 10.4 Assessment Criteria	
		Appendix 10.5 Construction Dust Assessment Procedure	
		Appendix 10.6 EPUK & IAQM Planning for Air Quality Guidance	
		Appendix 10.7 Operational Traffic Modelling Methodology	
		Appendix 10.8 Construction Dust Mitigation	
		Appendix 11.1 Transport Assessment	
		Appendix 11.2 Framework Travel Plan	
		Appendix 12.1 Flood Risk and Drainage Strategy	
		Appendix 12.2 Newcastle-under-Lyme Draft Local Plan 2020-2040	
		Appendix 12.3 Copies of Relevant Correspondence	
		Appendix 12.4 Assessment Methodology	
		Appendix 13.1 Relevant Legislation, Policy and Guidance	
		Appendix 13.2 Outline Soil Management Plan	
		Appendix 13.3 Agricultural Land Classification Report	
		ES Non-Technical Summary	WA

1 Submitted on-line (Planning Portal Ref. PP-13932412)

**APPENDIX 3**  
**Industrial and Logistics Need Assessment (April 2025)**  
**Executive Summary**

# Executive Summary

- This report has been prepared on behalf of Indurent. It provides an evidence-based and objective overview of the need for new industrial and logistics ('I&L') development within the FEMA (Newcastle-under-Lyme and Stoke-on-Trent), the FEMA Plus Stafford, and Newcastle-under-Lyme specifically where the Subject Site is located.

## A Significant Unmet Need Exists

- The I&L markets in the FEMA, the FEMA Plus Stafford, and Newcastle-under-Lyme are supply constrained, as indicated by low levels of availability, demand exceeding supply, limited years of supply, and strong rental growth. As a result, a significant unmet need exists across Newcastle-under-Lyme, the FEMA and the FEMA Plus Stafford over a 20-year period.
- Savills estimate total I&L demand across the FEMA to be between **359 and 491 ha** of land over the 20-year period (18 to 25 ha per annum). This compares to the **120 to 360 ha** of I&L land when combining the Newcastle-under-Lyme and Stoke-on-Trent evidence base over a 20-year period (6 to 18 ha per annum). Savills lower demand estimate (**359 ha**) therefore aligns with the higher estimate (**360 ha**) when combining the evidence base. Savills demand estimates increase to between **518 and 713 ha** for the FEMA Plus Stafford (26 to 36 ha per annum). This compares to between **172 and 496 ha** over a 20-year period (8.6 to 24.8 ha per annum) when combining the evidence base for Newcastle-under-Lyme, Stoke-on-Trent, and Stafford. Savills lower estimate for the FEMA Plus Stafford of **518 ha** is therefore higher than the upper estimate of **496 ha** when combining the evidence base figures.
- Next, we consider 'need' which is 'demand' less 'available supply'. Savills detailed assessment of existing known supply indicates a total supply of **83 ha** in the FEMA, and **149 ha** in the FEMA Plus Stafford. This is well below Savills demand estimates, indicating a shortfall of between **276 and 408 ha** in the FEMA, increasing to **369 and 564 ha** in the FEMA Plus Stafford. The Proposed Development will help to address the demand and supply imbalance.

	Savills Demand (Ha)	Savills Supply (Ha)	Unmet Need (Ha)
FEMA	359-491	83	276-408
FEMA Plus Stafford	518-713	149	369-564

- This shortfall does not include draft allocations. If draft allocations are to be included, such as the Subject Site, the need shortfall reduces to between **196 to 328 ha** in the FEMA, and **253 to 448 ha** in the FEMA Plus Stafford. To be conservative, the FEMA Plus Stafford shortfall of between **253 to 448 ha** includes the draft allocations in Stafford that have since fallen away following a Cabinet decision on March 6<sup>th</sup> 2025 to restart the Local Plan process for 2025 to 2045.
- It is important that the I&L sector's growth is facilitated given it provides better paid jobs compared to the national average across a diverse range of professions. The diversity of occupations has also been increasing which will enable the sector to play a key role in re-employing people that have lost jobs in other sectors of the economy. Should not enough I&L land be allocated into the future, and subsequently the historic supply constraints continue, I&L demand will remain 'suppressed', as will the jobs and the wider economic contribution the sector can make to the local and sub-regional economies.
- The Subject Site is ideally placed to help cater for the strong, unmet demand in the sub-region, in a prime location conveniently located to Junction 16 of the nationally significant M6, and the A500.

## The Subject Site is a Prime I&L Location

- The Subject Site is located adjacent to J16 on the nationally significant M6, and the A500, within Newcastle-under-Lyme Borough Council.
- Convenient access to suppliers and end customers with up to 26.7 million people (44% of England and Wales's population), and approximately 970,000 businesses (39% of England and Wales's businesses) accessible within a 2-hour truck time of the Subject Site.
- Convenient access to a pool of potential workers (labour supply) with around 1.1 million working-age people (aged 16-64) within a 32-minute drive time (average home-to-work travel time for Newcastle-under-Lyme).
- Convenient access to major freight handling infrastructure that can be utilised as part of I&L companies' wider supply chains.
- The Proposed Development will also increase the employment opportunities available to the deprived communities within commuting distance of the Subject Site. The Subject Site will also help to increase self-containment levels through local jobs for local people, increasing the borough's economic output from its workforce and helping to capture the sustainability benefits associated with residents travelling less distances to their places of work.
- Some of the key benefits associated with the Proposed Development include approximately 1,310 on-site construction jobs (gross, direct) over the construction period, between 2,500 and 3,570 on-site operational jobs (gross, direct), between £100.3 and 213.8 million in GVA, between £6.0 and 6.3 million in total business rates per annum, and an estimated £21.9 million of social value (NPV).

## I&L Growth is Structural, Not Cyclical

The I&L sector is a **major contributor to the national economy** and should be considered **critical national infrastructure**. The sector's performance is being driven by several key structural growth drivers including:



Rise of E-commerce



Global Freight Flows



Protecting Supply Chains

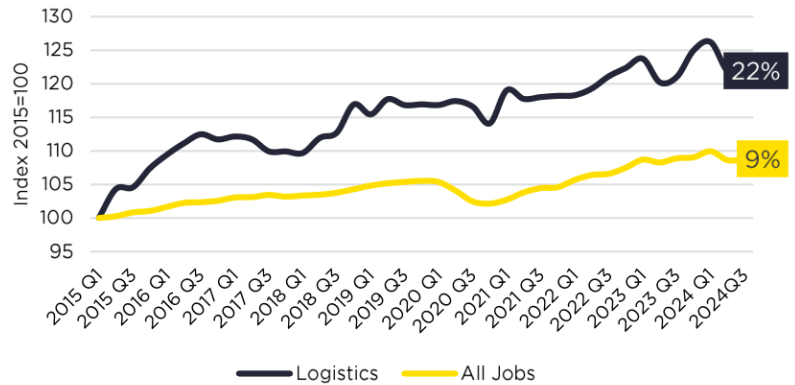
## I&L is the Fastest Growing Sector of the Economy

- Since 2015 the logistics component of the I&L sector has seen job growth of 22% compared to only 9% across the wider economy.

## I&L Jobs Pay More than Average

- The I&L sector pays higher wages across the UK. Compared to the All-Sector average, Logistics and Manufacturing sectors' annual median wages are +£4,300 per annum higher and +£3,900 per annum higher respectively.
- The sector supports a high-skilled and occupationally diverse labour profile.

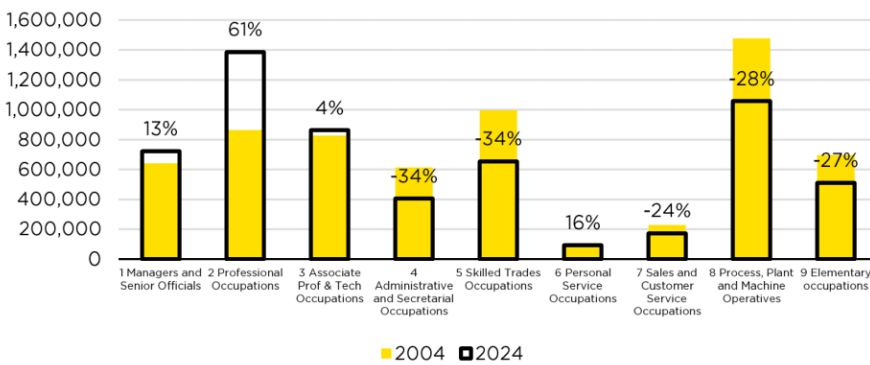
Logistics Vs. All Job Growth



Source: ONS (2025)

## High-Skilled, Quality Jobs

Occupational Distribution in the I&L Sector

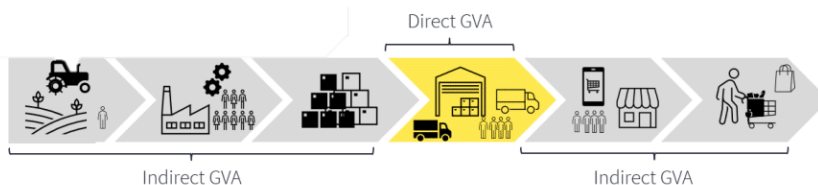


Source: ONS Annual Population Survey (2025)

- The jobs offered within the I&L sector are becoming higher skilled and more diverse. Within the I&L sector, the highest skilled occupations (Groups 1-3) have increased by 28% between 2004 and 2024. These roles are associated with engineering and technological professions in response to automation and robotics and increased office co-location.

## Economic Contribution is Much Larger than On-Site Jobs

A common misconception about the I&L sector is that operations are land hungry and have a relatively low density in employment terms. This fails to recognise the wider role it plays in supporting jobs which are not physically within a warehouse but are enabled by its operations. **For every 10 new warehousing jobs created on-site, another 7 to 12 jobs are created off-site.**



The indirect GVA of logistics in the UK is 3.5 times the direct GVA contribution, vastly greater than other sectors. This effectively measures the role it plays in supporting other business sectors and the economy more generally. **To impede logistics growth would undermine growth in other sectors of the economy too.**

Indirect GVA Generation (compared to direct GVA)

Logistics	3.5x
Office	0.6x
Manufacturing	0.9x
Retail	0.6x

Source: ONS Input Output Tables (2021)



# Newcastle-under-Lyme's I&L Market is Supply-Constrained

Current availability rate of 5.5% (2025 YTD)

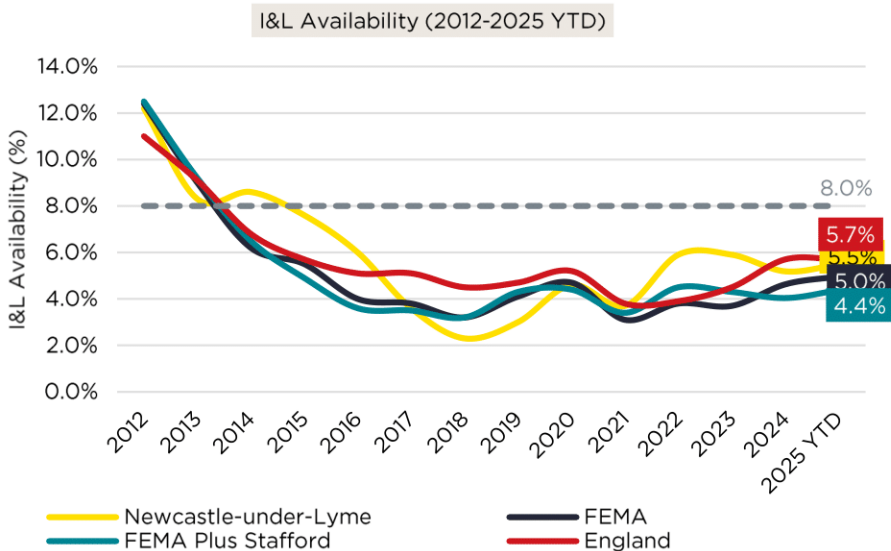
5.0 years of existing 'all quality' supply available reducing to 3.2 years for units above 9,290 sq.m

Strong rental growth of 73% (2012-2024)

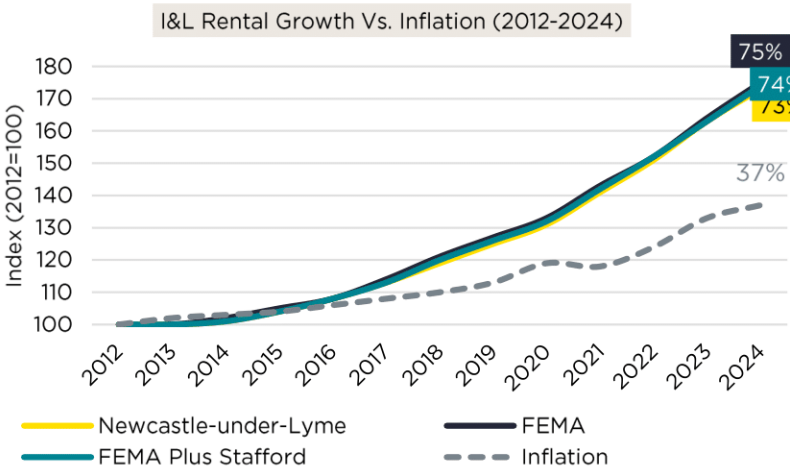
The sector's potential is being inhibited by a lack of supply in the FEMA, the FEMA Plus Stafford, and Newcastle-under-Lyme. This is demonstrated by the following key supply and demand metrics.

## Low Availability

- A market is supply constrained when floorspace availability is below the 8.0% equilibrium benchmark when supply and demand are broadly in balance.
- Availability in Newcastle-under-Lyme, the FEMA, and the FEMA Plus Stafford has been below the 8.0% equilibrium for all of the last decade.
- This in turn suppresses demand as not all occupiers can find space to meet their needs.



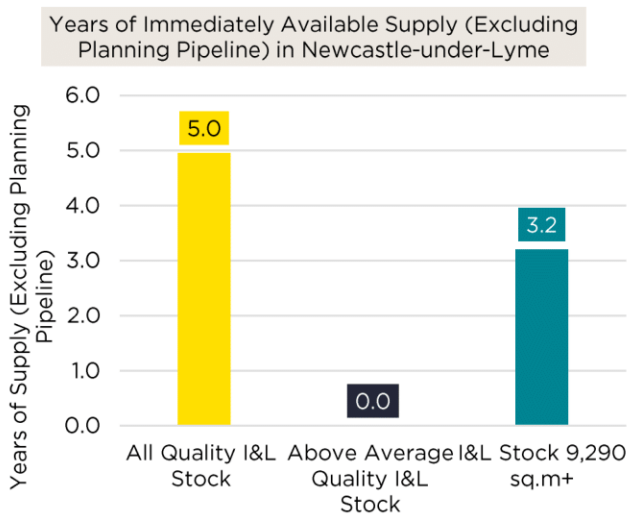
## High Rental Growth



- When demand outstrips supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents.
- Conversely, when there is sufficient supply to accommodate demand, rental growth is lower, typically tracking inflation more closely.
- In Newcastle-under-Lyme, the FEMA, and the FEMA Plus Stafford, rents have increased by 73%, 75% and 74% respectively between 2012 and 2024, which is twice the rate of inflation over the same time period at 37%.

## Limited Years of Supply

- Years of supply shows how many years the market can continue to operate at with existing net absorption trends before all currently available space is taken up.
- When using the 2012 to 2024 trend for net absorption, Newcastle-under-Lyme has 5 years of 'all quality' supply available, suggesting a need for new I&L floorspace in the short term.
- The years of supply situation becomes even more critical when considering currently available space of above average quality with no years of supply available.
- There is 3.2 years of supply available in Newcastle-under-Lyme for units over 9,290 sq.m, none of which is above average quality.



# Newcastle-under-Lyme HENAFU (2024), Stoke-on-Trent HENAU (2021), and Stafford EHDNA (2020) have Underestimated I&L Demand

savills

- The Newcastle-under-Lyme Housing and Economic Needs Assessment Further Update ('HENAFU') (2024) was undertaken by Turley to support the Publication Draft Local Plan. The HENAFU (2024) factors in the latest employment forecast and the extra year of take-up data that has become available since the HENAU (2023) was produced.
- The HENAFU (2024) has regard to several different estimation methods to quantify future demand for employment land in Newcastle-under-Lyme over the 17-year period (2023-2040), including labour demand, labour supply, and past take-up methods.
- For I&L uses only, the HENAFU (2024) estimates between **38.8 and 77.1 ha** over the 17-year time period (between 2.3 and 4.5 ha per annum).
- A wider FEMA including Newcastle-under-Lyme and Stoke-on-Trent that seeks to encapsulate sub-regional forces is considered preferable to examining Newcastle-under-Lyme in isolation.
- The Stoke-on-Trent Housing and Economic Needs Assessment Update ('HENAU') (2021) estimates between **73.5 to 270.0 ha** of I&L employment land over a 20-year period (2020-2040), which equates to between 3.7 and 13.5 ha per annum.
- The FEMA I&L demand estimates combining the Newcastle-under-Lyme HENAFU (2024) and the Stoke-on-Trent HENAU (2021) equate to between **120 and 360 ha** over a 20-year period (between 6.0 and 18.0 ha per annum).
- We also consider a wider geography given the large size of some of the units being proposed, and the Subject Site's position on the M6. This includes the local authority of Stafford Borough Council, which when combined with the FEMA represents our 'FEMA Plus Stafford' geography.
- Stafford's EHDNA (2020) estimates between **51.0 and 135.8 ha** over a 20-year time period (between 2.6 and 6.8 ha per annum).
- The FEMA Plus Stafford's I&L demand estimates combining the evidence bases together equates to between **172 and 496 ha** over a 20-year period (8.6-24.8 ha per annum).
- Our review of the employment evidence indicates that insufficient regard is given to market signals concerning market demand and supply factors as required by Paragraph 32 of the NPPF. Rather they rely on labour demand, labour supply, and past development rates to forecast future land needs. These approaches used have drawbacks which will have resulted in an underestimation of the future demand for I&L land.
- The table below summarises the gross demand for I&L uses in Newcastle-under-Lyme, Stoke-on-Trent, and Stafford presented in the evidence base.

Geography	Evidence Base	Author	Time Period	I&L Gross Demand (Ha)	I&L Gross Demand (Ha) (p.a.)	Preferred Method
Newcastle-under-Lyme	HENAFU (2024)	Turley	17 years (2023-40)	38.8-77.1	2.3-4.5	Labour demand, labour supply and past take-up
Stoke-on-Trent	HENAU (2021)	Turley	20 years (2020-40)	73.5-270.0	3.7-13.5	Labour demand, labour supply and past take-up
<b>FEMA</b>					<b>6.0-18.0</b>	
Stafford	EHDNA (2020)	Lichfield S	20 years (2020-40)	51.0-135.8	2.6-6.8	Labour demand, labour supply, and past take-up
<b>FEMA Plus Stafford</b>					<b>8.6-24.8</b>	

## There is a Significant Unmet Need

- Savills have developed their own methodology to estimate future I&L demand which seeks to address the methodological shortcomings of the evidence bases.
- Savills estimate total I&L demand across the FEMA to be between **359 and 491 ha** of land over the 20-year period (18 to 25 ha per annum). Savills demand estimates increase to between **518 and 713 ha** for the FEMA Plus Stafford (26 to 36 ha per annum).
- Savills detailed assessment of supply indicates a total supply of **83 ha** in the FEMA, and **149 ha** in the FEMA Plus Stafford. This is well below Savills demand estimates, indicating a shortfall of between **276 and 408 ha** in the FEMA, increasing to **369 and 564 ha** in the FEMA Plus Stafford.
- This shortfall does not include draft allocations. If draft allocations are to be included, such as the Subject Site, the need shortfall reduces to between **196 to 328 ha** in the FEMA, and between **253 to 448 ha** in the FEMA Plus Stafford. To be conservative the FEMA Plus Stafford shortfall of between **253 to 448 ha** includes the draft allocations in Stafford that have since fallen away following a Cabinet decision on March 6<sup>th</sup> 2025 to restart the Local Plan process for 2025 to 2045.
- The Subject Site represents a prime opportunity to address this imbalance in a prime location, adjacent to Junction 16 of the nationally significant M6.

