



Newcastle-under-Lyme Local Plan Examination

Response to Inspectors Post Examination Hearing Views – AB2 Land at Junction 16, M6

1. The Inspector in her post examination hearing views [EX/INS/06, paras 20-22] asked the Council to provide more information on the following topic areas in relation to Land at Junction 16, M6 (AB2): -

“Land at Junction 16, M6 - AB2

20. The Strategic Employment Sites Assessment Doc ED002 sets out the evidence in support of the Council’s case for the allocation of AB2 as a “strategic” allocation. The site is approximately 80 hectares in size and would provide around 220,000sqm of floorspace, along with a lorry park. The allocation of the site would result in an employment land supply substantially in excess of the range indicated in the HENA and I have not yet reached a conclusion on whether I consider the allocation AB2 to be sound.

21. Taking into account that the release of the site requires that exceptional circumstances be demonstrated, I am seeking further information in relation to why the Council consider it sound to allocate a site of this size, and whether alternative options were considered in this location, potentially for less employment space and involving a release of less Green Belt land. The Council need not repeat its case in relation to the strategic need for employment sites, including the need for distribution development, or the case for ensuring a range and quality of supply. I am primarily interested at this time in identifying how the floor space provision for this allocation and land requirement to provide this were arrived at.

22. The Council should also advise on whether they consider minerals safeguarding restrictions could alter current assumptions relating to the timescale for delivery on site”.

2. The Inspector in the post hearing views has also asked for further information (alongside other relevant sites) in relation to Flood Risk, Minerals Safeguarding and Green Belt Compensatory Improvements. These are subject to separate

notes. A note has been prepared on Minerals Safeguarding Areas in the examination library [EX/NBC/53], and confirms that there is no change to the current assumptions relating to the timescale for the delivery of the AB2 site in respect of minerals issues.

3. In order to assist the Inspector in her consideration of the site, the Council invited comments from the site promoter, Indurent Management Ltd (“Indurent”) as experienced land promoters of employment uses and to provide that developer / market perspective and technical insight to the Council. This is attached as an appendix to this note and addresses matters including Minerals Safeguarding Areas, Flood Risk, Employment Land and Green Belt Compensatory Improvements. The note from Indurent also includes comments from Iceni who were one of the co-authors of the West Midlands Strategic Employment Sites Study [ED036].

Plan Making Chronology

4. The Newcastle-under-Lyme Local Plan has been developed through Plan making stages as shown in table 1 below. References, at various stages, have been made to the AB2 site from an early stage of Plan making and there has been an evolution in how the site has been considered through the Plan making stages, including: -

Table 1: Stages of Plan Making

Stage of Plan Making	Commentary
Issues and Strategic Options Paper consultation took place from November 2021 – January 2022 [OD02, PDF page 56-57]	Information was included about the AB2 site and views sought on whether the site should be allocated in the Plan. The consultation document included a site size of approximately 70 hectares (to provide approximately 2.4 million square feet of employment space). Several benefits of and potential issues with allocating the site were discussed in the paper alongside questions as to whether a strategic employment site should be allocated in the Local Plan. The paper also provided an opportunity for views to be expressed about the site and whether it was suitable for allocation in the Local Plan.
First Draft Local Plan consultation took place from June - August 2023 [OD01, PDF pages 59-60]	The Council published its evidence base, which included the Strategic Employment Site Assessment (“SESA”) from Aspinall Verdi but noted that no decision had been made on any of the strategic site propositions (site references AB2/TK30/KL15 respectively). Information was being sought, at that time, on the principle of strategic allocations alongside the site

	options being considered. The AB2 site included a total site size of circa 70 hectares. The First Draft Local Plan [OD01] presented a net developable figure of around 54 hectares, which was representative of what would typically be required to accommodate a scheme of the type highlighted in the Issues & Options [OD02] at an assumed 40% ratio of floorspace to site area. This was used to represent a hypothetical scenario without prejudice to site promoter submissions, reflecting the Council's statement [OD01, para 14.5] that it was not looking to allocate the sites at that stage, but was instead seeking views on the principle of allocating strategic employment sites and on the site options themselves. This included seeking further technical information on the sites from statutory consultees, infrastructure providers, neighbouring authorities and residents.
Final Draft Local Plan, consultation took place from August 2024 - October 2024 [CD01, PDF pg 118-119]	Following consultation on the First Draft Local Plan [OD01] and as the Council progressed towards production of a Final Draft Local Plan [CD01], additional engagement with the site promotor resulted in the boundary for the AB2 site being further revised (the addition of circa 9 hectares) in order to allow for the orientation of proposed employment units and additional mitigation to be delivered in recognition of the scale of the site within the wider landscape. The total site area is circa 78 hectares (rounded to 80 hectares in the Local Plan).

5. AB2 has been promoted extensively throughout the plan making process, including in the period that pre-dates the inception of the Newcastle under Lyme Borough specific Local Plan. Briefly, that has included representations from the Site Promoter (previously St Modwen, now Indurent) to:
 - Consultation on Strategic Options for the Joint Local Plan that was being prepared by Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council (during the of Summer 2017).
 - The Preferred Options draft of the Joint Local Plan (consulted on in early 2018).
 - Following the Newcastle-under-Lyme Council decision to withdraw from the joint Local Plan, and prepare its own Local Plan, to the consultation on the Issues and Strategic Options, First Draft and Final Draft (Regulation 19) Local Plan consultation documents, as set out in Table 1 above.
6. The representations made at each of these stages were supported by extensive evidence across a range of topics. The central message – around AB2 being a

suitable, available and deliverable location, and meeting the need for strategic employment development here – remained consistent throughout.

7. In summary, the AB2 site has consistently been considered at an overall site allocation scale, of between 70-80 hectares, and has evolved through the plan making process. In the Final Draft Local Plan, it is the total site area that directly links to the strategic employment and exceptional circumstances case being advanced by the Council.

AB2 – Site Size

8. The Inspector has acknowledged that exceptional circumstances exist for the release of Green Belt land in the Borough in the post examination hearings advice note [(EX/INS/06, para 15).
9. As advanced in the examination hearing sessions, the Council considers that the approach it has taken to AB2 in the Local Plan is consistent with the NPPF, particularly paragraphs 85 – 87, in terms of: -
 - a. helping the conditions for businesses to invest, expand and adapt (para 85);
 - b. to set out a clear economic vision and strategy through the Local Plan, to set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the Plan period (para 86 a and b);
 - c. To seek to address potential barriers to investment and be flexible enough to accommodate needs not anticipated in the Plan (para 86 c and d);
 - d. to recognise and address the specific locational requirements of different sectors including for storage and distribution operations at a variety of scales and in suitably accessible locations (para 87).
10. The vision of the Local Plan [CD01, PDF pg 19] refers to the proposed site, at Junction 16, as a sub-regional exemplar business park. Policy PG1 ‘Overall Development Strategy’ similarly refers to its sub-regional role and its logistics focus.
11. Strategic Objectives for the Local Plan, in particular SO-2(II) [CD01, PDF Pg19] refer to the need to diversify the Borough’s employment base and deliver employment sites which benefit economic growth for the region, focusing on sectors including advanced manufacturing, distribution and logistics amongst others.

12. In this view, the site scale is important. The scale of the site is such to meet market requirements for specific types and forms of logistics uses that require a certain unit size and orientation to optimise their location. It is the scale of the site, alongside the uses proposed, that plays into meeting the vision and strategic objectives of the Plan, for the site to play a sub-regional role and meet specific market requirements whilst maximising the advantages of its location.
13. The site is located at the convergence of strategic transport routes (A500 / M6). The Strategic Employment Site Assessment (“SESA”) [ED002, para 9.18-9.21] notes the importance of the M6 as a strategic route, giving rapid access to the north and south but also, along the A500/A50/A34 corridor, providing access to more local markets. It demonstrates that there is a strength of demand for large units adjacent to the M6. The SESA [ED002, para 10.10] notes that big box industries, separate from built up areas are attractive to businesses looking for accessibility to markets and employees.
14. The size of the proposition at AB2 is also in recognition of infrastructure investment required across the site, which includes a dedicated access from the A500, alongside other detailed infrastructure requirements. The West Midlands Strategic Sites study notes that larger strategic sites support the viability of employment sites, particularly in respect of infrastructure investment [ED036, pdf page 11].
15. The West Midlands Strategic Sites study recommends that strategic employment sites are sufficiently large and flexible, ideally a minimum of 25 hectares and readily available over 50 hectares in size. The site should also provide for good connections to the strategic highway network and be located away from incompatible land uses [ED036, PDF pg 21].
16. The West Midlands Strategic Sites study notes that in terms of unit size, average demand has got bigger for manufacturing and logistics occupiers looking at units of 100,000 sqm plus [ED036, Para 5.6, PDF pg 85]. The study recommends that several future strategic sites will be at the upper end of the scale (over 50 hectares) to maximise opportunity for major inward investment and infrastructure. The average site, tested through the site testing exercise in the West Midlands Strategic Sites Study, was 80 hectares in size [ED036, paragraph 10.52, pdf page 144/145].
17. The West Midlands Strategic Sites Study [ED036] identifies a Road Opportunity Area 1 covering Newcastle-under-Lyme, Stoke and Stafford Districts and identifies a requirement of two mixed industrial and logistics strategic sites of

about 50 hectares and a further industrial site of around 25 hectares [ED036, pg 17]

18. The allocation of the site in its given form also presents an opportunity to provide a secure, high-quality lorry park off the A500 and accessible to the M6 motorway. There is also site-specific considerations including, for example, the presence of a gas pipeline and easement alongside flood mitigation which must be kept free from development and is being accommodated within the wider site.
19. The site boundary (and its size) also recognises the potential impacts of the site. The size of the site has enabled mitigation measures, including extensive green infrastructure to be proposed. The location of strategic green infrastructure is such that it runs alongside and in between units to provide for screening of the respective unit sizes. The site size is also important to achieve effective zoning of different logistics activities, as well as best facilitating vehicle movements for access / egress and within the site.
20. This approach also allows designated areas for warehousing, cross-docking, container yards, support offices, and utility infrastructure. Buffer zones (including landscaping) serve to minimise the impact of noise, air pollution, and traffic on surrounding residential or environmentally sensitive areas. This is considered especially appropriate given the countryside setting of the site. Providing varied plot sizes also allows the development to cater for strategic units at a range of scales, including larger units for occupiers with particularly large strategic requirements. Flexible plot configurations ensure compatibility with a range of facility types, such as distribution centres, e-commerce fulfilment hubs, and temperature-controlled warehouses.
21. The consideration of the extensive Green Infrastructure offer (approx. 40% of site area) is explained further in the Employment Land Clarification Note [ED039, para's 9-13]. The provision of Green Infrastructure is considered to suitably complement and support the accommodation of the units, allowing for strong landscape corridors rather than providing for a denser form of development that would increase the impact of the proposals on the landscape. This is consistent with the advice contained in the Council's landscape study [ED017, pdf page 90] which recognises the need for substantial greenspace and suitable landscape buffers through the site to break up the urban form and contribute to separation between built areas.

22. The site promoter has confirmed that 40% of the site is taken up by strategic and on-plot landscaping forming several green corridors across the site. The Council would be agreeable to a modification to criterion 15 of policy AB2 as follows,

15. Provision of strategic **and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site open space within the northern centre of the site, including the whole of the area in between Public Footpaths Audley 9 and Audley 22 to be delivered as part of development Phase 1**

23. The exceptional circumstances for AB2 include that the strategic employment site at Junction 16 of the M6 (currently Green Belt) provides a sub-regional logistics focused employment park to accommodate employment development to meet a sub-regionally identified logistics need and provide for alternative HGV parking, in line with evidenced requirements demonstrating the need for such provision. There is a need for employment land in this location, close to the M6 and strategic road network, as well as a general lack of other suitable sites to meet the overall scale of new employment land needed in the borough.

Therefore, there are site level exceptional circumstances to amend the Green Belt to accommodate this strategic employment site. It is the size of the site and strategic role / proposition that directly links to the exceptional circumstances case and the release of Green Belt.

24. To release a smaller site, would not, in the Council's view, amount to exceptional circumstances and would not deliver the strategic scale or realise the benefits of the site needed to take advantage of the location of the site and its intended use (logistics / distribution). Modern businesses relevant to the logistics and manufacturing sectors require large, high-quality and environmentally sustainable premises. The site is of a scale to capture the benefits of its location on the strategic road network on key artery routes which are desirable in market terms and to facilitate a sustainable form of development.

25. The extent of the site included for AB2 in the Final Draft Local Plan aligns with that of the outline planning application (Ref: 25/00346/OUT). The submission of a planning application demonstrates that the site is a deliverable proposition within the Plan period. Indurent is an experienced developer in the employment sector and has promoted the site for some time. There is a signed statement of common ground between the Council and Indurent [EX/SCG/05] that details the delivery of the site over the Plan period.