

Newcastle under Lyme Local Plan Examination in Public

Indurent Management Ltd (“Indurent”)

Comments on Inspector’s Post Hearing Advice Letter

Planning Prospects Ltd

19 September 2025

Introduction

Indurent are promoting land south east of M6 Junction 16 for strategic employment development which is allocated in the emerging Local Plan (Policy AB2). Indurent participated in Hearing sessions concerned with issues surrounding the allocation of site AB2. Indurent have submitted an application for outline planning permission for the development of the land in a form anticipated by Policy AB2.

Following the Hearing sessions in a letter dated 1 August 2025 the Inspector wrote to the Council with a request for additional information to assist with her consideration of the soundness of the Plan. This Note sets out the observations of Indurent in relation to those matters raised by the Inspector in her letter of most relevance to site AB2.

Minerals Safeguarding Areas

The Inspector notes (paragraph 8) that for some sites minerals safeguarding is a constraint. Site AB2 is not specifically referred to in this part of the letter in this regard (nor indeed are any other sites). Paragraph 10 of the Inspector’s letter says;

“The Council should therefore seek the advice of SCC as to the nature of the resource, whether abstraction is likely to be required prior to development, or if the proximity of existing residential or other development is in some cases likely to prohibit extraction.”

The planning application for site AB2 was supported by a detailed Mineral Resource Assessment prepared by Wardell Armstrong (ref. ST21667 0001 V2.0). A copy of that Assessment is provided alongside this Note. In terms of the nature of the resource, the Assessment notes that site AB2 is located within a Mineral Safeguarding Area (MSA) for superficial sand and gravel and bedrock sand and gravel.

However, the Assessment shows that in fact there is little to no superficial sand and gravel present on the site. The MSA covers sand and gravel which is outside the proposed allocation. Two small deposits of superficial sand and gravel within the site boundary have not been safeguarded due to their small size, and in any event have previously been worked. Development will not sterilise any safeguarded superficial sand and gravel mineral.

A limited area of safeguarded bedrock sand and gravel lies within the south east of the site but it is too small to comprise a standalone hard rock quarry. The report conclusively demonstrates that it is also not economically viable to prior extract such a small quantity of material, due to the associated costs with stripping the soils and overburden (glacial till) that overly the bedrock sand and gravel.

In this context extraction will not be required prior to development. Minerals safeguarding is not a constraint for Site AB2

Flood Risk

The Inspector notes (paragraph 11) that the Strategic Flood Risk Assessment (“SFRA2”) identifies flood risk within sites including AB2. Two main points are raised in this regard.

First, she asks (paragraph 12) the Council to, “...provide further, detailed information to support these allocations by identifying what the wider sustainable development objectives are that the allocations would meet.”

The Strategic Objectives for the Borough set out in the Plan (referenced SO-1 to SO-13) and the proposed criteria of Policy AB2, and notably Policy AB1, are concerned in some detail with securing sustainable development.

Of the three overarching objectives:

- (i) *Economic:* SO-2 concerned with diversifying the employment base, generating skilled jobs for local people, and delivering employment sites which will benefit economic growth for the region focusing on sectors including advanced manufacturing, distribution and logistics.

Thus, the current Indurent planning application would deliver up to 220,000 sq m of employment space (suitable for distribution / logistics and manufacturing) plus a training hub and lorry parking (up to 200 spaces). Direct employment during construction is estimated at 1,310 jobs, and up to 3,570 jobs during operation, in a sector where annual median wages are higher when compared with the UK average. Gross Value Added of up to £214M reflecting the pivotal role the sector plays in supporting the wider economy, and annual business rates of around £6M are estimated for the development.

- (ii) *Social:* Aspects of SO-1 and SO-9 around health and wellbeing, and accessibility. Aspects of SO-7 around active and sustainable travel.

Thus, in the current Indurent planning application, using established industry metrics, it results in value to factors including apprenticeships; construction careers information, advice and guidance; work experience; NHS savings; and supporting local businesses, calculated at £21.9m per annum, with measurable improvements to health and wellbeing. That scheme also includes a commitment to enhancements to public rights of way around and through the site, an extensive network of new recreational routes created within the site where public access is currently limited to existing underused rights of way. Separately a comprehensive package of measures to promote active and sustainable travel is proposed. A bespoke training and skills plan is also being developed, partnering with key local education stakeholders and building on Indurent's role supporting the Stoke and Staffordshire Institute of Technology as a Core Employment Partner.

- (iii) *Environmental:* Aspects of SO-1 around sustainable construction. SO-4 in relation to sustainability, renewable energy, and greener construction. Aspects of SO-9 around provision of green and blue infrastructure. SO-13 in terms of protecting and enhancing the historic environment.

Sustainable construction and energy are very readily capable of being dealt with through policy criteria, notably criteria 4, 5 and 6 of Policy AB2. Within the Indurent planning application at least 40% of the site is proposed as green infrastructure with significant woodland planting and over 100,000 new trees and shrubs planted on site. The site contains no designated heritage assets, buried remains are not a constraint here, and the closest standing designated asset is located beyond the M6.

In summary, the Plan includes a series of Strategic Objectives which strongly resonate with overarching sustainable development themes at a national level. Whilst a range of approaches might be taken here the Indurent application provides a case study of the nature and extent of specific sustainable development benefits that will be realised consistent with this; these are demonstrably substantial.

Second, the Inspector notes (paragraph 13) that National Guidance;

“...requires that in developing such sites development is directed to parts of the site at lower flood risk and does not increase the risk of flooding elsewhere. It also indicates that the effects of climate change should be considered in assessing flood risk. As the Regulation 19 consultation appears to have taken place after the production of the SFRA2 the Council should demonstrate that in light of its advice the allocations remain sound, taking into account the likely future effects of flood risk. In particular, in line with the advice in the SFRA2, assumptions as to the likely pattern of development on allocated sites should take into account the likely disposition of surface water flooding and its depth and velocity.”

Again, the detailed analysis undertaken to inform the planning application is instructive. Whilst some parts of site AB2 are identified as being at flood risk (primarily fluvial and surface water), a robust sequential approach has been applied to the layout of the proposed development so as to ensure that flood risk is effectively minimised and managed in line with national planning policy and the detailed guidance set out in the Level 2 SFRA.

Further to this, detailed assessments (including site-specific surface water and fluvial hydraulic modelling) have been undertaken to support the Flood Risk Assessment and inform the sequential approach. These assessments demonstrate that development will be delivered safely, without displacing surface water or fluvial flood risk, both in terms of depth and velocity, and without increasing flood risk elsewhere. Notably, initial hydraulic modelling indicates a material reduction in flood risk downstream, specifically adjacent to the M6 motorway, as a direct result of replacing the existing access culvert. The site-wide flood risk mitigation strategy also ensures that development achieves appropriate resilience to future climate change impacts.

Flood risk will be safely managed through a combination of design, engineering, and operational measures. Ground levels will be appropriately raised where necessary, and more vulnerable elements of development, such as access roads, car parking, and service infrastructure, strategically located in areas of lower risk where necessary maintaining safe access and egress routes.

Surface water drainage will be managed using a range of sequentially arranged, multifunctional Sustainable Drainage Systems (SuDS), including attenuation basins, permeable paving, swales, and filter drains. These features will control discharge rates to pre-development levels, ensuring there is no increase in runoff. In addition to managing flow, the proposed SuDS will provide adequate water quality treatment before surface water is discharged from the site. Combined with a programme of regular maintenance, these measures will ensure the site remains safe, operational, and contributes positively to the wider catchment's flood risk management strategy.

The commercial nature of the proposed use, which is classified as ‘less vulnerable’ in planning terms, further supports its suitability within this location. Development is justified in flood risk terms not only due to its strategic positioning and the wider economic benefits it will deliver, but also because necessary flood risk mitigation measures will be embedded within the design of the entire site. The effective implementation of these measures is however dependent on the delivery of the whole development, ensuring a coordinated and robust response to managing flood risk.

In essence, the very detailed work undertaken in support of the current application provides comprehensive reassurance that this second point raised by the Inspector is suitably addressed, and will be secured by the detailed criteria of the policy.

Employment Land

Context

In terms of employment allocations the Inspector acknowledges (paragraph 15) that there are exceptional circumstances to release land from the Green Belt in the Borough. In relation to site AB2 her comments (paragraphs 20 – 21) include;

“The site is approximately 80 hectares in size and would provide around 220,000 sqm 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.

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.”

It is understood that the Inspector’s key concern in this regard is to understand why the Council allocated this quantum of land, rather than a lesser amount. The policy refers to the site as being “circa 80 hectares”. Measured accurately and as reflected in the Indurent planning application the site area is 78.3ha.

Policy

In national policy terms (here, the December 2023 NPPF) 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 (paragraph 85).

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.

Here, and responding to these national policy requirements, the site is intended to serve a strategic need. Policy AB2 refers to it as a “high-quality strategic employment site”. The “Vision for the Borough” (paragraph 4.1 of the Plan) refers to, “a sub-regional exemplar business park at Junction 16 of the M6 Motorway to support sustainable economic growth and take advantage of the accessibility of the Borough to the wider strategic transport network.”

Evidence

Strategic need is not addressed by the findings of the HENA which is concerned with estimating local (Borough) needs. The strategic need is evidenced instead in the West Midlands Strategic Employment Sites Study (WMSESS, ED036), supplemented by the work of Savills within Indurent’s representations.

The WMSESS locates site AB2 in “Road Opportunity Area 1”, which comprises a corridor along the M6 focussing on Newcastle under Lyme, Stoke and Stafford districts.¹ These Opportunity Areas (OA) are considered to provide a guide on optimum locations for future (road based) strategic employment sites. The evidence base identifies the FEMA as comprising Newcastle and Stoke districts, whilst also highlighting the relevance of Stafford as part of an extended market in this part of the West Midlands.

Having assessed the regional requirement for strategic employment land the WMSESS carries out a distribution exercise which for OA 1 identifies a requirement for two mixed industrial and logistics strategic sites each of about 50ha, and a further industrial strategic site of about 25ha. This indicates a combined strategic requirement of about 125ha. In the shared knowledge of the WMSESS across the West Midlands Authorities and through Duty to Cooperate discussions there has been no suggestion that the other OA 1 authorities have any difficulty in this context of an allocation of the size proposed at AB2.

In terms of Plan led provision in the other OA 1 authorities, in Stoke the adopted Core Strategy dates back to 2009 and does not speak to current strategic requirements. Regulation 18 consultation on the emerging Local Plan is taking place between 8 September and 20 October 2025. Regulation 19 consultation is anticipated in April / May 2026 with submission expected November 2026. No timetable is currently set for Examination and Adoption but that will clearly extend well into 2027. The Regulation 18 document includes draft allocations. No provision is proposed to be made by Stoke for strategic employment land, and the largest proposed employment allocation is only 17.7ha.

In Stafford the Local Plan was adopted in two parts in 2014 and 2017 and again does not address strategic requirements. The Council are just now (September 2025) embarking on the first (visioning and strategy) stages in the preparation of a new Local Plan with a published programme based on a 30 month programme leading to adoption at the end of 2027.

The period for the Newcastle under Lyme Plan is 2020 - 2040. For the new plan in Stoke the period is proposed to run to 2040 and in Stafford to 2045. At present the only site identified to meet strategic need across these three OA 1 authorities through to 2040 is AB2.

There is also an important interpretation point with the WMSESS. At paragraphs 10.51 – 10.52 it states;

*“As clearly indicated the minimum site size for consideration is typically 25 ha. Across a recommended road need for 548 to 858 ha this is the equivalent of 22 – 34 sites of this size. **However, it is far more common now for sites to be upwards of 50 ha, which provide more viability in terms of infrastructure investment.** At this scale the range of sites required would be 11-17, which is still considerable. Sites below this 25 ha threshold in the right location and with the right attributes may still meet the needs of strategic sites.*

*This study cannot pre-empt the final mix of site sizes and count as in most instances the market will need to identify sites. Some sites will be delivered as 10 ha extensions to existing, some at 25 ha or below, some of 50 ha and a number will be larger. **Ideally at least half of the future strategic sites (6-9) will be at the upper end of the scale i.e. 50ha+ which maximises opportunity for major inward investment and infrastructure.** Through the site*

¹ This Opportunity Area is strongly focused on Newcastle under Lyme, Stoke and Stafford districts but extends marginally into South Staffordshire district. South Staffordshire district relates closely to the Greater Birmingham and Black Country conurbation and hence a different market. The WMSESS suggests a single potential strategic location at the southern end of this Opportunity Area within the northern edge of South Staffordshire. This location (Junction 13 of the M6) is (like site AB2) also controlled by Indurent. The emerging South Staffordshire Local Plan proposes to allocate 17.6ha of employment there (so significantly below the 25ha strategic site threshold), and an outline planning application by Indurent is currently pending determination there. There are currently no other feasible locations for strategic employment development within the small part of OA 1 which falls within South Staffordshire.

*testing exercise undertaken through this work, which did not consider ownerships boundaries, **the average size of site was 80 ha.***” (emphasis added in bold)

Following the Inspector’s questions, the authors of the WMSESS were invited to comment further on aspects of its treatment of land at Junction 16. Their response (provided here at Appendix 1) confirms their view that this is an optimum site for strategic employment development; alternatives to meet the OA 1 requirement are likely to be limited; and that there are likely to be specific local reasons (notably landscape) which drive a plot ratio yielding a larger site area. This is addressed further below.

The strategic need is additionally evidenced through material submitted throughout the Plan consultation period on behalf of Indurent and brought together through their Regulation 19 representations. Those representations included an October 2024 Needs Assessment prepared by Savills, which was further updated (to April 2025) with an extract provided in material appended to Indurent’s Matter 9 Hearing Statement.

This assesses need across the FEMA comprising Newcastle and Stoke and an extended area additionally including Stafford, so the authorities where OA 1 is focused. It is a sub-regional exercise that complements the regional approach in the WMSESS and draws on the evidence bases of the relevant Authorities, as well as Savills’ own assessment of the market.

For the FEMA the lower end of Savills’ estimated demand over a 20 year period (359ha) coincides with the upper end of the estimate derived from the two constituent councils’ evidence bases (360ha), with existing supply of 83ha identified leaving an unmet need of about 276ha. For the FEMA plus Stafford (the OA 1 authorities) the lower end of Savills’ estimated demand over a 20 year period (518ha) is comparable with the upper end of the estimate derived from the three constituent councils’ evidence bases (496ha), with existing supply of 149ha identified leaving an unmet need of about 347-369ha. More generally the Indurent evidence over an extended period including the most recent Savills material points to this as being a pressing need that has not been met for some considerable time.

Further aspects of the relevant evidence base in this regard are summarised in the letter provided here at Appendix 2. This draws on evidence submitted through the Plan preparation period to confirm that there is a clear localised requirement for very large units; there is simply no local supply of very large units; location is critical for industrial and logistics occupiers; there is a series of factors driving the requirement for larger strategic sites; existing local provision is not well located in that regard; but site AB2 is a prime location to accommodate large scale strategic employment development. It notes that these very large units require larger service yards, space for SUDS, strategic landscaping, and more land is needed to accommodate outdoor amenity areas for employees and Biodiversity Net Gain requirements, which in turn drives a need for larger sites.

Approach to AB2

Reading the evidence around strategic employment need together the amount of land identified to be accommodated in OA 1, the unmet need across the FEMA (either on the councils’ evidence or Indurent’s evidence), and the unmet need across the FEMA plus Stafford (again on either evidence base) are well in excess of the 78ha allocation proposed at AB2. The evidence also emphasises that for viability and infrastructure reasons larger (over 50ha) sites are now far more common, with the recommendation being that such sites are specifically planned for to maximise major inward investment and infrastructure, indeed with the average size of site tested being 80ha.

Contrary to good planning, there is no Plan led strategic employment development identified in the other OA 1 Authorities either in terms of an adopted or emerging Plan that could contribute to the requirement that exists now, and AB2 has been identified as a prime location well suited to accommodate large scale strategic employment development.

In this sense AB2 might be characterised as an “average” sized strategic site rather than a notably large one, well attuned to meeting a well-defined strategic need focused on this area,

that will not otherwise be met through Plan led development. It is scaled to encourage major inward investment of a type that has been absent from Newcastle, and the wider sub-region, despite the long standing nature of the need. Consistent with the evidence base its deliverability is also related to scale, noting the costs associated with opening up the site (new junction onto A500, integration with the M6, new spine road down the length of the site), bringing utilities in, engineering plateaus across the landform, and offering and maintaining public transport (made more viable through large scale development).

The headline ratio of floorspace to site area at AB2 (about 28%) might appear to be relatively low, but there are particular reasons for this.

The Regulation 19 representations made by Indurent included analysis of 25 existing major employment sites where the ratios achieved range from 25% to 37% and the average is 32%. This variance is driven by local considerations, but applying that average ratio of 32% to the 220,000 sq m of floorspace targeted at AB2 would require still a site of some 68.75ha.

In terms of the local considerations relevant to site AB2:

- Approximately 3ha of the site will be taken up by a lorry park for which a separate and pressing location specific need exists
- A 90m wide swathe of land across the centre of the site must be kept free from development due to the existing gas pipeline and easement (this amounts to approximately 4.7ha kept free from development)
- A further corridor of land crossing the site must be kept free from development to avoid the flood zone alongside the brook (this amounts to around a further 3.6ha to be kept free from development)

More generally it is important here to take a landscape led approach to development that also responds to the topography rather than imposes a treatment on it, so that development can be accommodated in the most appropriate and sensitive way. Significant land is required to create large-scale development plateaus in response to the specific market need for larger footprint buildings. It would not be appropriate in design or landscape terms to create a dense development with buildings closer together. Rather, and as demonstrated by the careful analysis of the site and its context which informed Indurent's Plan representations and the planning application, the best approach is one which seeks to introduce a series of strong landscape corridors around and across the site to create the most effective setting for built development. This requires a larger land-take, but yields a far better outcome.

The approach taken in the planning application would mean that at least 40% of the site (about 31ha) is taken up by strategic and on-plot landscaping. This approach is illustrated in the plan provided at Appendix 3. This shows how the current application addresses the site and the rationale for a series of green corridors which frame and separate development plots planned to respond to the character of this location. A range of outcomes is possible here but this example shows a carefully planned solution to create an optimal outcome for this setting which would result in 42% of the site taken up by strategic and on-plot landscaping.

The treatment anticipated by the Plan based upon detailed appraisal of the site justifies the site as a whole being taken out of the Green Belt. However, it if was considered necessary to ensure that the proposed landscape strategy is adhered to, then it could be that criteria are introduced into the policy ensuring that there is a requirement to define and specify Green Infrastructure and ensure it is kept development free, and under a long-term management regime. It would then operate permanently as an extensive open and landscaped resource performing a range of beneficial functions embedded within the retained Green Belt area. This approach (i.e. defining an amount or proportion of land to be kept permanently as Green Infrastructure) would be a preferable approach to the current criterion in policy AB2 which seeks to define a single specific area within the central part of the site to be kept clear of development. It would deliver a better outcome in Green Belt as well as landscape and visual terms, and support a carefully planned and site sensitive development.

Minerals

The Inspector also notes in this part of her letter (paragraph 22) that, *“The Council should also advise on whether they consider minerals safeguarding restrictions could alter current assumptions relating to the timescale for delivery on site.”*

As discussed above minerals safeguarding is not a constraint for site AB2. It has no bearing on timescales for delivery of the site.

Summary

Drawing these points together for Employment Land:

- i. There is a policy expectation to identify and meet strategic employment need, including across boundaries.
- ii. Strategic employment need is not directly informed by the findings of the HENA which is concerned with estimating local (Borough) needs. The strategic need is evidenced instead in the WMSESS.
- iii. The WMSESS identifies a requirement for Opportunity Area 1 for two mixed industrial and logistics strategic sites each of about 50ha, and a further industrial strategic site of about 25ha. This indicates a combined strategic requirement of about 125ha. . The immediacy of that need is recognised.
- iv. Through Duty to Cooperate discussions it is clear that none of the other authorities within Opportunity Area 1 has any objection to the scale of the AB2 allocation. Moreover, none of the other authorities within Opportunity Area 1 are planning to allocate strategic sites to meet this identified need.
- v. Importantly the WMSESS states that "...it is far more common now for sites to be upwards of 50ha, which provide more viability in terms of infrastructure investment" and, "Ideally at least half of the future strategic sites (6-9) will be at the upper end of the scale i.e. 50ha + which maximises the opportunity for major inward investment and infrastructure".
- vi. There is a range of factors which combine to drive the required size for strategic sites upwards (beyond 50ha) including in relation to viability, meeting the largest occupier requirements, and site specific considerations. AB2 can reasonably be characterised as a strategic site of average scale in this regard.
- vii. The site specific considerations at AB2 driving and justifying site size include the provision of the lorry park; exclusion of an easement and flood zone; and crucially a landscape led approach to development which responds to the locality rather than imposing a solution on it.
- viii. This approach would result in at least 40% of the site taken up by strategic and on-plot landscaping.
- ix. The most appropriate policy approach in this regard in Green Belt, landscape and visual terms would require the definition of an amount or proportion of land to be kept permanently as Green Infrastructure, rather than the definition of a single specific area.

Green Belt Compensatory Improvements

The Inspector raises a point (paragraph 36) in terms of the adequacy with which the Plan ensures that the impact of removing land from Green Belt will be compensated. She refers (paragraph 37) to the post-hearing work undertaken by the Council (EX NBC 37) which sets out a range of measures aimed at improving the environmental quality and accessibility of the Green Belt. She notes that the Council do not at this stage wish to identify the most appropriate

measures for each site and accepts that the detail of how this is to be achieved can be provided during the development management process.

This notwithstanding she goes on to state (paragraph 38) that;

“...for this approach to be effective, and before the land is released from Green Belt, each allocation should be able to demonstrate that such measures are viable and achievable, with off-site works only being considered where works adjacent to, or near, the site are not achievable, or where off-site works would achieve greater environmental value. The Council should therefore review each site allocation where land is to be removed from the Green Belt and provide convincing evidence that compensatory works are achievable and viable.”

The Council's additional work (EX NBC 37) suggests additional wording to criterion 6 of Policy PSD5 (Green Belt) which would now read;

“Development proposals for sites removed from the Green Belt should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt Land to offset the impact of the removal of land from the Green Belt. These improvements should demonstrably enhance environmental quality, biodiversity and accessibility. Details of such improvements will be considered during the development management process and assessed on an individual application basis.”

Additional wording is also suggested for the supporting text to the policy referring to compensatory improvements to the environmental quality and accessibility of remaining Green Belt. The examples listed in the suggested expanded supporting text include:

- New or enhanced green infrastructure
- Woodland planting
- Additional landscape and visual enhancements (beyond those needed for immediate mitigation)
- Improvements to biodiversity and natural flood resilience
- New or enhanced walking and cycle routes
- Improved access to new, enhanced or existing recreational provision

By way of example in terms of how this can be achieved through the development of site AB2 the planning application submitted there by Indurent offers a range of compensation measures relating to land adjacent to or near the site which resonate with the Council's examples including:

- Enhancements to the Public Right of Way network immediately surrounding the site (surfacing, stiles / gates, fencing, signage)
- Enhanced hedgerows and tree belts, and proposed woodland, scrub and hedgerow on land immediately west of the site (beyond the M6), delivering green infrastructure, screening and biodiversity benefits
- An on-site sustainable drainage system including natural above ground features leading to reduced off-site (and on-site) flood risk
- Active travel (cycle) improvements extending east from the site connecting through to Audley then Bignall End, with associated benefits to the pedestrian environment in those places

Aspects of the on-site approach offered by the application are also relevant here. Over 40% of the site is dedicated to strategic and on-plot landscaping in the manner discussed above. This enables:

- The existing Public Right of Way network crossing the site to be retained and enhanced and well-integrated with surrounding routes.

- The provision of an extensive and exemplary green infrastructure framework to provide landscape and visual enhancements reaching beyond immediate mitigation.
- The provision of accessible recreational open space with new recreational routes opening up land which was previously private, made available to the public as well as the new workforce.

These measures are extensive. They are explicitly included as part of a planning application submitted by an experienced, reputable and well-resourced developer as an achievable and viable offer by way of compensatory improvements. The Council has not yet reached a view on their acceptability through the development management process but it has been clearly demonstrated through an active example that a raft of compensatory works are readily capable of being provided to support the release of site AB2 in a manner consistent with the Council's suggested policy. It should also be noted that parties whose ownerships make up the site also own further Green Belt land beyond it where opportunities for other measures may be possible if needed.

APPENDIX 1
Iceni Letter on WMSESS and M6 Junction 16



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

RICHARD HICKMAN
Senior Director of Planning
Floor 2
One Colmore Row
Birmingham
B3 2BJ

2nd September 2025

BY EMAIL

Dear Richard

J16 M6, STRATEGIC NEED

I am a director in Iceni's Economic Team and was the project director for the West Midlands Strategic Employment Sites Study (WMSESS) 2024. This work contracted to Dudley Council on behalf of 22 authorities across the West Midlands, many of which sat on the project steering group, as identified in the report. It is now published on various authority websites including Birmingham City Council and is being used to guide Local Plan examinations including Rugby Council.

You requested my considerations regarding two points on the above location in the context of the Study (WMSESS) 2024.

- ***The “amber” status of the site in the WMSESS***
- ***The draft allocation extending to as much as 80ha***

My considerations as below.

The “amber” status of the site in the WMSESS

- The site scores 40% in the WMSESS, and sites below 50% have an amber (not green) score
- Its score is notably lower by one of the factors, being a poor rating public transport accessibility (table 11.3 of that report). This is based on current provision, and does not take account of any future investment in provision. The report notes that such scores need to be seen in the context that they may change, as reflected in para 11.40 of that report.
- The site remains an 'optimum' site for strategic industrial and logistics development. As per chapter 11 of the WMSESS, the assessment was undertaken for all large scale potential employment sites on the strategic road network on key artery routes, where effectively land at junctions would be considered desirable in market terms and meet the credentials in broad terms for a strategic employment site, subject to the further considerations of the LPA.
- Only 4 potential sites were identified in the Stoke / Stafford area, to meet an approximate need of 2x50ha logistics parks and 1x25ha manufacturing park. Therefore alternatives are likely to be limited.

The draft allocation extending to as much as 80ha

- The WMSESS defines 'need' for strategic employment in floorspace terms and converts this to land areas, using a notional 0.35 ratio. This is higher than the 'typical' 0.4 employment

land ratio, due to the additional needs of larger sites such as infrastructure and landscape management. The 0.35 ratio is derived from a sample of sites in Leicestershire, gathered in 2020 (Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change, Appendix F). This research identifies that landscape has a significant impact on plot ratios. The WMSESS also notes that (para 10.2) *There may be instances where these ratios are lower taking into account specific landscape issues or accommodating biodiversity net gain.*

- In reality, plot ratios can vary drastically, to deal with such issues, and each site should be considered on its merits and constraints. Plan makers should separately consider the relationship between net developable area and gross 'red line'.

Yours sincerely,

Matt Kinghan
Director

mkinghan@iceniprojects.com

APPENDIX 2
Savills Letter on Strategic Need and Suitability of Land
Southeast of Junction 16 M6

10 September 2025

The Savills logo, featuring the word "savills" in a red, lowercase, sans-serif font, set against a yellow rectangular background.

Damien Holdstock
Planning Director
Indurent
Email: Damien.holdstock@indurent.com

Mark Powney
E: mark.powney@savills.com
DL: 020 3107 5418

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Dear Damien,

Strategic Need for Industrial and Logistics ('I&L') Development in Newcastle-under-Lyme and Suitability of the Subject Site

We understand that you require Savills' objective view on the need for large units in Newcastle-under-Lyme, locational requirements, and the scale of site necessary to attract occupiers.

Detailed analysis on the strategic need for I&L development is presented in the Savills I&L Needs Assessment undertaken in April 2025 to support Land Southeast of Junction 16, M6 ('Subject Site'). Our summary observations justifying the release of a site of this scale within Newcastle-under-Lyme to support I&L development are outlined below.

Growing Requirement for Very Large Units Exceeding 9,300 sq.m

- Over the last decade the average size of I&L units has been increasing, driven by robust demand and investor inclination. The UK Warehousing Association report that the average size of an I&L unit has increased from 217,000 sq.ft (20,200 sq.m) in 2015 to 340,000 sq.ft (31,600 sq.m) in 2020¹. This is the result of growing demand for larger units which are needed to deal with the greater throughput of goods.
- This analysis is consistent with the findings of the **West Midlands Strategic Employment Sites Study ('WMSESS')** (2024). This states that in terms of unit size, the average unit size demanded has increased, with 9,300 sq.m units no longer considered 'big-box', with logistics occupiers looking for at least 20,000 sq.m and many significantly larger than this to support operations.
- Larger units require larger service yards, space for Sustainable Urban Drainage, strategic landscaping, and more land is needed to accommodate outdoor amenity areas for employees and Biodiversity Net Gain requirements. The **WMSESS** (2024) acknowledges this by recognising that it is far more common now for sites to be over 50 ha, which provides more viability in terms of infrastructure investment.

No Supply Locally

- Locally, the demand for 9,300+ sq.m units has resulted in a supply-constrained market. The Savills I&L Needs Assessment (April 2025) reports zero availability in very large units (23.2-46.5k sq.m) and the largest units (46.5k+ sq.m) in Newcastle-under-Lyme.

¹ The UK Warehousing Association ('UKWA') (2021) The Size and Make-Up of the UK Warehousing Sector. Available at: <https://www.ukwa.org.uk/wp-content/uploads/2021/05/Savills-UKWA-A4-8pp-Report-Interactive3.pdf>



- Within the 9,300+ sq.m I&L market in Newcastle-under-Lyme, there is currently no available stock of above average quality², and therefore no years of supply. This clearly indicates that there is an immediate need for good quality stock which meets modern occupier requirements in Newcastle-under-Lyme.

Location is Fundamental

- Given its foundational role in the storage and transportation of goods, location is critically important for I&L occupiers as it impacts the efficiency and viability of operations. Sites in close proximity to major urban conurbations and freight handling infrastructure, such as major motorway corridors and strategic rail freight terminals, are considered prime locations for I&L development.
- The importance of location is further evidenced in the Savills European Logistics Census, where 96% of respondents cited building location as 'important' or 'very important' when deploying new capital³.
- Research carried out by Cambridge Econometrics for National Highways identified the sectors which have a significant reliance on the Strategic Road Network ('SRN'). Freight and logistics industries represent the most prevalent SRN-reliant sector, with 70% of all road freight using the SRN⁴. A comprehensive study⁵ of the freight and logistics sector prepared for the National Highways concluded that the SRN represents the single most important factor in the location decisions made for the development of national and regional distribution centres.
- The SRN relevant to Newcastle-under-Lyme includes the M6 Corridor and the A500. Despite the importance of the SRN for I&L occupiers, the majority of Newcastle-under-Lyme's existing inventory over 9,300 sq.m is positioned away from the M6 Corridor.

These points combine to support a strong conclusion that a motorway served site of real scale is needed within Newcastle-under-Lyme.

The Subject Site's location adjacent to Junction 16 of the M6, and proximity to both the A500 and A50, means that it is one of the best located sites in the wider area. This is also acknowledged by the **Strategic Employment Site Assessment** ('SESA') (2024) which considers sites adjacent to the M6, such as the Subject Site, to be at a premium, and of continued interest to very large companies with very large requirements. There is a clear market aspiration for well-located, high-quality sites along the M6 Corridor, and the Council needs to make sure that they have a pipeline of new, well-located developments coming forward otherwise occupiers will continue to go elsewhere.

The scale of the Subject Site (78.3 ha) enables it to meet the needs of multiple large occupiers and respond to the factors identified above which drive the need for very large sites acknowledged by the WMSESS. The Proposed Development will therefore not only help to address the unmet needs for large units (9,300+ sq.m), it will deliver I&L floorspace in a prime location where there is a clear market aspiration, and will enable Newcastle-under-Lyme to participate in the growth engine of the I&L sector.

Yours sincerely

² We use CoStar's rating system as a measure of stock quality with 4 and 5 stars equating to above average quality. We consider stock that meets these quality levels as being representative of that which meets modern occupier requirements.

³ Savills European Logistics Census (2023) is a survey of over 400 occupiers, developers, investors, landowners, asset managers, agents, and advisors involved in the I&L sector. Its aim is to understand opportunities and challenges facing the sector. Available at: https://www.savills.co.uk/research_articles/229130/351442-0

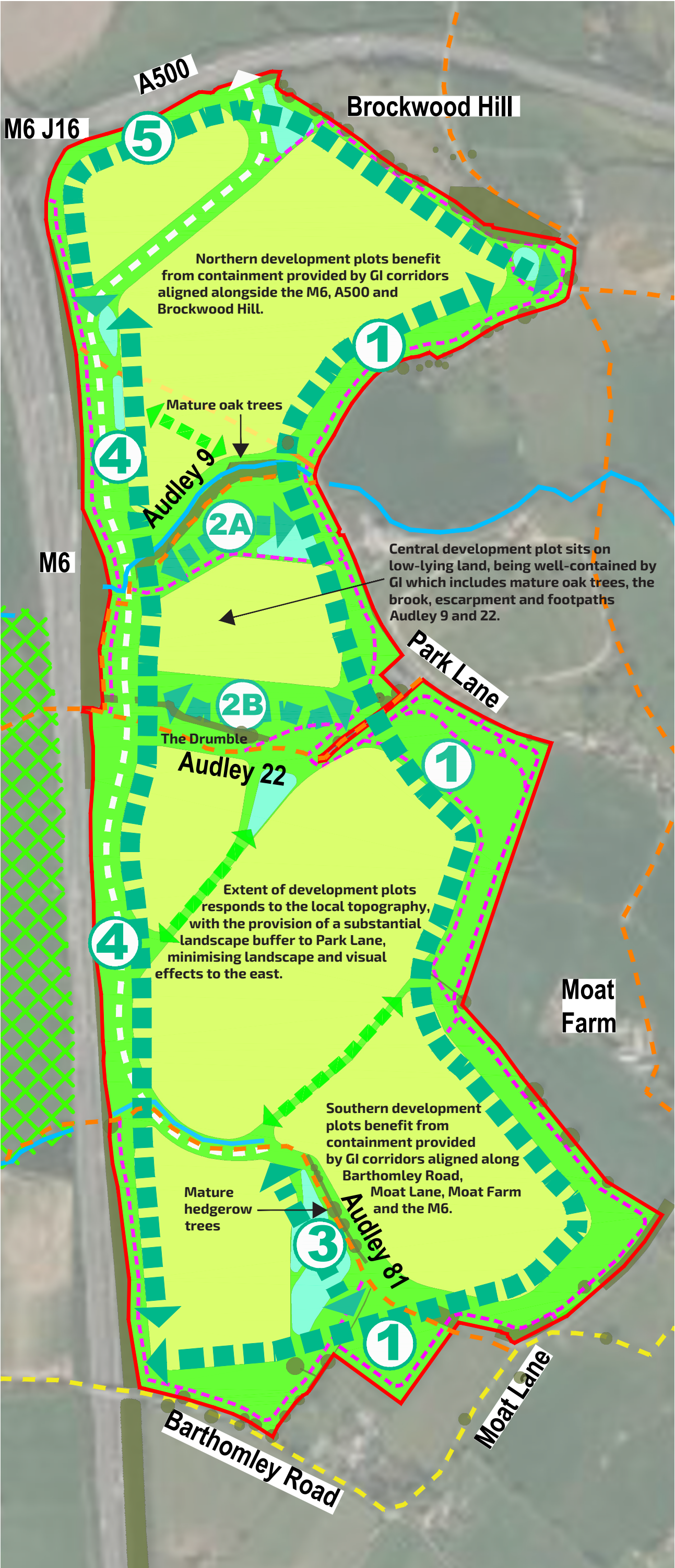
⁴ Continuing Survey of Road Goods Transport (2021/22) cited in the Freight and Logistics Study (2023)

⁵ Lichfields, MDS Transmodal, Cushman & Wakefield, Freight and Logistics Study (2023)

A handwritten signature in blue ink, reading "M. Powney".

Mark Powney
Director, Economics

APPENDIX 3
Green Infrastructure Strategy Plan



KEY

Site Boundary

78.3Ha

Strategic Green Infrastructure (GI) 29Ha
(37% of the total site area).
Note: 29Ha Strategic GI excludes development plots and access road.

Development Plots
Additional landscaping within the development plots will increase the overall GI provision to approximately 42% of the total site area.

Primary GI Corridors
No.s 1-5 Refer to details below

Secondary GI Corridors
- indicative location subject to future design

Existing watercourse

Existing Pubic Rights of Way

Existing PRoW Two Saints Way

Proposed recreational route

Access Road - indicative location

SUDs attenuation basin - indicative location

Existing vegetation - hedgerow, trees & woodland

Potential off-site Environmental Enhancements by Domvilles Farm

0

100

200

300m

N

- 1

Eastern and Southern Corridors:

Creates landscape buffers to Barthomley Road & Moat Lane.

Woodland belts help define permanent Greenbelt boundaries & combine with proposed bunds/mounding to provide visual screening to the east.

A range of new habitats creating linked wildlife corridors.

New recreational routes improving the accessibility of remaining Green Belt land.

2

Central Corridors:

Corridor 2A is aligned along the brook watercourse, footpath (Audley 9) and belt of mature oak trees.

Corridor 2B is aligned along footpath (Audley 22) and localised escarpment, the 'Drumble'.

Opportunities for new recreational routes.

SUDS & wetland habitat creation.

3

Southern Central Corridor:

Corridor 3 is aligned along footpath (Audley 81), an existing field hedgerow and belt of trees.

SUDS & wetland habitat creation.

4

Western Corridor:

Creates a landscape buffer along the M6 corridor.

Existing vegetation cover will be supplemented with new planting, creating linked wildlife habitats and providing visual screening.

A tree-lined street is proposed as part of a high-quality landscape along the primary access road.

Opportunities for new recreational routes.

5

Northern Corridor:

Creates a landscape buffer by the M6 junction 16, A500 corridor and existign woodland / veteran trees on Brockwood Hill.

High-quality landscape creates a distinctive green gateway into the Site and provides opportunities for new recreational routes.

SUDS & wetland habitat creation.

P01	02/09/25	First Issue.	50 / JJ
rev	date	description	drwn/chkd
client			
INDURENT			
project			
M6J16			
title			
GREEN INFRASTRUCTURE STRATEGY PLAN			scale 1:5000 @A3
number			
7734-FPCR-XX-XX-DR-L-0014			status SX
			rev P01

FPCR

environment & design

CAD

t: 01509 672772

e: mail@fpcr.co.uk

w: www.fpcr.co.uk