

# Matter 8 – Staffordshire Moorlands Local Plan Examination

## St Modwen Homes

September 2018

### Matter 8 Allocations - Villages

1. St Modwen Homes own land within the allocation DSR1, a mixed use allocation of 300 homes and 48 hectares of employment land, adjacent to Blythe Bridge. This Statement focuses on Question 1 concerning the identification of sites and Question 2, concerning Blythe Bridge DSR1.

### Identification of Sites

#### ***Is the approach within the SHLAA to assessing the suitability and screening of sites in the settlements robust?***

2. Yes, the approach is robust. The Council have outlined the approach to site selection in ED13.4 picture 3.1. It is a process informed by evidence and engagement.
3. The SHLAA approach, is part of the site selection process is discussed in ED13.4. The SHLAA was prepared in 2015. ED 26.2 details the SHLAA Maps for the larger sites, and it is clear from the map of Blythe Bridge that the significant SHLAA sites offering potential for allocation, were all within the Green Belt.
4. Two sites were considered at Blythe Bridge as potential residential allocations within the Preferred Options Sites and Boundaries 2016 Consultation; Site BB054 and Site BB041. St Modwen Homes made representations to the June 2016 Preferred Options Local Plan, and objected at paragraph 55 (copy attached) to the inclusion of those sites.
5. Paragraph 8.10 refers to the Preferred Options stage of the Local Plan, and adjusting the Spatial Strategy and Rural Areas infill approach, as a response to consultation. As noted in paragraph 8.10, the Government reiterated its approach to protecting the Green Belt in 2017 within the Housing White Paper 'Fixing our broken housing market' and following this, the Council reduced the rural areas share of housing, and in 2017 the Preferred Options Local Plan was able to remove a number of previous Green Belt releases including SHLAA sites BB054 and BB041.
6. The allocation of 300 homes and 48ha of employment land at Blythe Bridge was made in 2017, and is a site not constrained by the Green Belt. It enabled a '*significant reduction in the proposed number of sites and sites in the Green Belt*' (paragraph 8.12 ED 13.4). This accord with the approach set out in the White Paper is therefore a robust approach.

#### ***Do the Green Belt Assessments support the allocations in the larger villages?***

7. ED13.4 confirms on pages 76-77 that in respect of Blythe Bridge, there were no exceptional circumstances, following the Green Belt Assessment of SHLAA sites, to release SHLAA sites BB054 and BB041 from the Green Belt. Paragraphs 55 -56 of the St Modwen Homes representations to the 2016 Preferred Options consultation provide further comment on this. The Green Belt

Review (ED22.4) did not assess the St Modwen Homes land because the site was not a Green Belt site, following its removal from the Green Belt in the previous Local Plan and Core Strategy. It is therefore not assessed within ED22.4 or mapped within ED 24.4b.

***Does the Local Plan provide for a range of sites of different sizes in the rural area?***

8. The Local Plan provides for a range of sites of different sizes within the rural area, without being a less than sustainable dispersal strategy. Policy H2 identifies six allocated sites across six villages. In addition Policy H1 is supportive of new housing on sites not specifically allocated, where the site is within the development boundaries of a larger village, subject to compliance with the spatial strategy and local plan policies. Outside of the development boundaries, the Local Plan is also supportive of limited infill development of an appropriate scale and character.

***What is the up to date position in relation to planning permissions affecting proposed allocations?***

- Within DSR1, St Modwen Homes secured detailed planning permission in May 2018 for 118 dwellings. Development is subject to a number of pre commencement conditions and these have been progressed by St Modwen Homes, in preparation for an application to be made that will secure the approval of those conditions and commencement of development on site. These details include
    - Condition 4 – External Materials
    - Condition 6 – CEMP
    - Condition 7 – S.I. & Risk Assessment
    - Condition 8 – Detailed Remediation Strategy
    - Condition 13 – Foul & Surface Water Drainage plans
    - Condition 18 – WSI
    - Condition 22 – CEMP: Biodiversity
    - Condition 33 – Air Quality Assessment
    - Condition 34 – EV charging points
9. Natural England have also confirmed that a Licence is not required in advance of preparing the habitat within Phase 2 for protected species. This has enabled St Modwen Homes to also prepare and submit an application to construct the second phase of the access road into the allocated site and this will connect Phase 1 (where 118 dwellings are approved) to Phase 2.

***Blythe Vale (DSR1)***

***Is the Council satisfied that the landscape, green infrastructure, biodiversity, heritage, highway, transport and flood risk impacts can be mitigated so that development of the site would be acceptable?***

10. St Modwen Homes submitted an Evidence Report with the Preferred Option response in 2016. This is appended for ease of reference, and it addresses the points raised in the question above.
11. In terms of Landscape, ED 22.1c provides the constraints plan undertaken in support of the Council's Landscape and Settlement Character Assessment. It clearly illustrates that there are no landscape constraints within the St Modwen land at DSR1. In terms of landscape setting, part of the site is characterised with small scale landscape hedgerows and hedgerow trees, albeit the detailed planning permission (2017/0512) has been able to retain this structure within the approved plans and the masterplan approach for phase 2 will do likewise.

12. The Council have assessed the green infrastructure and biodiversity of DSR1 within ED14 at paragraph 31.4. This is in addition to the St Modwen Homes Phase 1 Habitat Survey that supported the planning application for 118 homes made in 2017. ED 14 summarise the findings of the Council's survey work and does not highlight any habitats that were of importance above site level (paragraph 3.14.44). LPA ecologists were also supportive of the planning application in 2017 for 118 dwellings on the site, and the proposed mitigation for impacts arising from the scheme.
13. In terms of heritage, ED 22.3 (Historic Environment Character Assessment) confirms that there are two Grade II Listed Buildings within the core of Blythe Bridge, outside of the allocation DSR1. These were also identified and assessed as not being affected by the planning application for 118 dwellings on behalf of St Modwen Homes in 2017. Phase 2 of DSR1, controlled by St Modwen Homes is located further away from these two assets and therefore will not adversely impact on them either.
14. In terms of highways and transport, the planning application for 118 dwellings included a junction arrangement that has been designed to accommodate the allocated site DSR1, and was approved by the highways authority. The access road within Phase 1 has been designed to a width that can accommodate the employment and residential elements of the allocation.
15. The land within St Modwen Homes control is located outside of Flood Zone 2 or 3. ED22.1c also confirms on the Blythe Bridge constraints map that the DSR1 site is located outside of the flood zone.

***Is the allocation in a location where the need to travel will be minimised and how use of sustainable travel modes can be maximised? Can reasonable connectivity to the village be secured from the development, particularly the housing component?***

16. In approving the first phase of residential development, the Council's Planning Committee Report considered on 2 November 2018 includes the following comments with regards sustainability and travel (paragraphs 7.26-7.29):

*'Accessibility is a key aspect of sustainability that can be measured. The site is located adjacent to the existing built up area of Blythe Bridge, which lies on the opposite side of the A521 to the north. Blythe Bridge is the only settlement in the Moorlands which benefits from a mainline rail station, which is approximately 1 mile or 19 mins walk (7 mins cycle) from the site. Network Rail has suggested a contribution towards provision of cycle facilities at the station. This would assist the environmental sustainability credentials of the site. From the station rail services to Stoke, Derby, Crewe and Nottingham can be joined. Other facilities are also within easy reach by walking and cycling. For example, the Co-Op Food Store is 0.6 miles (12 mins walk), Blythe Bridge High School is 0.8 miles (15 mins walk) and the library and St. Peters Church are a similar distance. Tesco Express is 0.7 miles (14 mins walk) and there is a cash machine nearby. The nearest Health Centre and Doctors Surgery is only 0.4 miles (8 mins walk). There is a bus stop 0.3miles from the site which provides for bus connections to Hanley commencing at 6am with the last service returning at 6.30pm. However, access to all of the above is dependent upon being able to cross and walk / cycle along the A521 in order to access the main part of the settlement. As part of these proposals a pedestrian crossing would be provided at the new traffic light controlled junction into the site as well as a new footway, along the north side of the road.'*

*Therefore, subject to provision of these off-site works overall the site is accessible to non car modes and is located within reach of local facilities. It also has a number of bus services that are available close to the site and is within easy access of mainline rail facilities. As such, it does not raise any sustainability concerns.'*

17. Given the above officers comments, it is clear site DSR1 is well located for encouraging non car based travel to the services and facilities in Blythe Bridge, and provides for connection to locations further afield. The access road into the site has been designed to a width that can facilitate buses, which once the remainder of the allocation receive planning permission, may have the potential to be diverted into the site.

***Would the residual cumulative impacts of the development on A50/A521 junction be less than severe taking into account any improvements that can be carried out?***

18. Highways England responded to the Local Plan Preferred Option in September 2017. Their letter notes that they have taken a preliminary review of the Local Plan to consider the potential traffic implications associated with the allocation. They note that there may be material implications for the network at the A50/A521 junctions and they request that more detailed traffic assessment is a priority. Furthermore they consider that the traffic at this junction should be considered cumulatively with planned growth. At a site specific level, Highway England request continued communication with site developers to ascertain traffic impacts and potential mitigation proposals.
19. The first phase of development at Blythe Bridge (application reference (2017/0512) was consented after these comments were made by Highways England to the Local Plan process. Highways England was consulted on the planning application for phase1. The traffic modelling was satisfactory.

***Should the policy be more prescriptive in terms of the employment component and phasing, noting the requirement for masterplanning?***

20. St Modwen Homes do not consider that the policy needs to be more prescriptive. The site's potential has been unlocked by virtue of the planning permission afforded to phase1, which provides access to the allocation. The access has been designed to serve the needs of residential and commercial traffic. A more recent planning application for the continuation of that road into phase 2 is to be determined by planning committee on 27<sup>th</sup> September 2018 and this will provide a further extension of the infrastructure towards the A50. With these elements of infrastructure in place, this will provide an organic delivery of the DSR1 allocation.

***Are all the policy requirements necessary and clear to the decision maker?***

21. The policy requirements are accepted. The application proposals for phase 1 were policy compliant in terms of affordable housing. They included a transport assessment and travel plan, and were also designed to include a junction and access road, designed to technical specifications that accommodated the wider development of the site as envisaged by Policy DSR1. Pre application discussions were held with the District Council and the Highways Authority and consultation responses were received, including those from Highway England and Staffordshire County Council Highways Authority. These confirmed that the proposed junction and access road could be extended to serve the wider allocation, and the application therefore was not prejudicial. In addition, addressing other criterion within the Policy DSR1, the Phase 1 proposal

included the provision of suitable crossing facilities to enable access on foot and bicycle to the existing facilities in Blythe Bridge. These will be delivered through a S278 Agreement.

22. The scheme went before (and was approved by) planning committee with no technical objections, noting that statutory consultees referenced within the Policy DSR1 – such as Network Rail, Environment Agency, Highways England were all consultees on the Phase 1 planning application too.
23. The planning application for that first phase of residential development also tested the impacts on the surrounding road network and A50, and as a result the early engagement (required by the 3<sup>rd</sup> criterion within Policy DSR1) has already commenced.
24. To conclude on this point, the phase 1 planning application included a full suite of technical studies, some of which extended to cover the phase 2 site – for example, Landscape and Visual Impact Assessment and ecology and these studies will be used to inform the phase 2 planning application. Therefore the criterion within Policy DSR1 concerning appropriate landscaping (and mitigation) and the consideration of biodiversity, are areas already known to St Modwen and will be factored into the development of the Phase 2 element of the site (north of the A50).

***Is the site deliverable taking into account multiple ownerships, infrastructure requirements and the possible need for cross subsidy?***

25. The site has been assessed as part of the SMDC Sustainability Appraisal (February 2018) and it is considered at paragraph 6.817-6.823. Alternative sites not taken forwards are also appraised within the SA and the explanation for them being discounted is also detailed on page 539 of the Site Proformas Document (February 2018). It is noted that at Blythe Bridge, alternatives that were discounted required Green Belt release (para. 6.824-6.825). The SA notes that there are no other sites of this scale or status that are available on non-Green Belt land to help meet the SMDC OAN (page 336 SA 2018).
26. St Modwen Homes control land with the capacity to deliver 300 homes, north of the A50, within allocation DSR1. As an experienced, national housebuilder, St Modwen Homes have progressed the technical elements of work necessary to implement their detailed planning permission for phase 1 of the proposed residential development. The site has been within the ownership of St Modwen as a development company prior to St Modwen Homes, and extensive knowledge of the site is held. The infrastructure requirements necessary to deliver the site are very much related to access, and the junction to serve the site will be delivered as part of the phase 1 proposals. St Modwen Homes will fund the delivery of this access point.

Contact

Jo Russell  
jo.russell@turley.co.uk

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## Appendix 1: June 2016 Representations

Regeneration Manager  
Staffordshire Moorlands District Council  
Moorlands House  
Stockwell Street  
Leek  
ST13 6HQ

14798/A3/JR/sw

9<sup>th</sup> June 2016

Dear Sir/Madam

**REPRESENTATIONS TO THE STAFFORDSHIRE MOORLANDS LOCAL PLAN – PREFERRED OPTIONS**

1. On behalf of our Clients St Modwen Developments Ltd ("St Modwen") we welcome the opportunity to respond to the Local Plan Preferred Options Sites and Boundaries consultation. These representations are made in respect of St Modwen's interests at a site on the south east of the settlement of Blythe Bridge and Forsbrook. A site plan of St Modwen's interests is attached at **Appendix 1** to the Evidence Base Report that supports these representations. The St Modwen Site is referred to within the consultation document as the Northern Gateway Opportunity Site, and forms part of the allocation known as "Blythe Vale, Blythe Bridge (Core Strategy Regional Investment Site for employment development)". St Modwen own and control the first phase of development (i.e. comprising land to the north of the A50) of the extant planning permission (reference 11/00405/REM) that relates to the development of what is termed, a 'Premium Employment Site'.
2. For the purposes of these representations we will refer to the St Modwen site as 'Blythe Vale' and the settlement within which the site is located, as Blythe Bridge and Forsbrook.
3. We address the questions relevant to St Modwen's interests within this letter, and this is accompanied by details in support of our points, within the enclosed Evidence Base Report. The Report is an evolving document that St Modwen are adding to as part of their continued engagement in the Local Plan review process, and as further technical work becomes available.
4. We address the relevant sections below:

**Section 3: Development Requirements and Distribution**

1. **Do you have any comments regarding the proposed housing requirement for the Local Plan?**

5. We note that SMDC have commissioned a SHMA (2014) and that Assessment concluded that there was a need for 260-440 homes per year across SMDC along with a need for 707 affordable homes per year over the next five years. The 2016 Update to that Assessment concluded that the housing needs for the District lie between 250 – 440 homes per year over the period 2012-2031. The lower end of the range is based upon Household Projections and relates to demographic growth, whereas the higher end of the range relates to economic growth supported by inward migration. The Consultation Document states at paragraph 3.10 that choosing the middle of the range would *'retain the same number of jobs as the present day'*. However the Council have chosen a requirement of just **320 dwellings per annum**, and this figure falls slightly short of the middle of the range position (we note that a mid range between 250 and 440 dwellings would be 345 dwellings per annum).
6. The Staffordshire Moorlands 2012-based Sub-National Household Projections Update - January 2016 Revision provides a summary of the scenarios that were tested, from demographic change through to economic change. All demographic scenarios led to a decrease in job growth. The economic led scenarios supported job growth from 2,250 jobs across the Plan Period linked to 329-398 dwellings per annum, or 3,878 job linked to 401-473 dwellings per annum. The lower jobs figure in each of these instances being where 'reduced commuting' was applied as a policy choice. A 10% uplift is then added in a second Scenario's table within the 2016 Update.
7. This uplift results in a range of 319 -520 dwellings per annum that would deliver the economic led growth scenarios. 319 dwellings per annum would support 'job stabilisation/past trends' and is the figure supported by the Council. Appendix 4 to the Council Assembly Report (2<sup>nd</sup> March 2016) presents an analysis of the different housing requirements that lie within this 'uplifted' range that went on to inform the Member's decision and the Consultation Document. The 520 dwellings per annum is seen as the outlier – which we agree with and is a 'test' that sits above OAN. However the analysis within Appendix 4 of the 2<sup>nd</sup> March report does not justify why the full OAN of 440 dwellings per annum cannot be met, given that the report lists the benefits of delivering 440 dwellings per annum as:
  - ***'More closely relates to the affordable housing need than lower options***
  - ***Likely to generate greater economic benefits than lesser options by boosting the labour force, supporting jobs growth (approx. 2,250 ) and wider financial benefits such as New Homes Bonus income'***
8. In a District where there has not been a five year housing land supply for 6 years; and where affordable housing need (770 dwellings within 5 years) is set to outstrip any market housing that will be delivered in the next 2 years at least, there can be no greater pressure for a LPA to choose to meet its full OAN, and where this is equally supported by the conclusion that this option will also boost the labour force and deliver greater economic benefits. An annual requirement of 320 dwellings per annum will not deliver these benefits.
9. We therefore object to the text at paragraph 3.11 of the Consultation Document that indicates the level of 320 dwellings per annum would:
  - ***"Sustain a modest increase in jobs over the plan period by increasing the size of the workforce in comparison with lower levels of housing growth."***



10. We consider that the Plan is internally inconsistent, and at best, confusing in its approach to aligning jobs and housing. We seek clarity on the text within paragraphs 3.10-3.11. The 'modest increase in jobs' that SMDC suggest at paragraph 3.11 of the Plan will be delivered, cannot be achieved if the text at paragraph 3.10 is correct – which states that the middle range would only maintain jobs and not increase them. SMDC are planning for lower than the middle point of the range, hence by consequence, jobs would decrease. To plan for economic growth, the Council must plan for the higher end of the range, i.e. 440 dwellings (minimum).

- ***"Is aspirational but realistic...when considered in the context of an historic average delivery rate of 195 homes per year."***

11. The NPPF is clear on the need to significantly boost the supply of homes and Local Plans across the country are having to respond positively to this 'step change', with significant increases in housing requirement as a result. Where sites are available, suitable and achievable, with the support of a willing landowner – as in this case, then strong support should be given towards their development. We note that the SHLAA was prepared in July 2015, prior to the Issues and Options Consultation for the Local Plan in September 2015.
12. In September 2015 St Modwen responded to the Local Plan consultation, and at that time, maintained the support for the allocation of the Blythe Vale site for employment use. This was important in terms of establishing St Modwen's clear desire to develop their land and ensuring that the Council were aware of this option.
13. In preparation for this stage of consultation, and having reviewed and reflected on the evidence base, St Modwen consider that the delivery of the Blythe Vale site is most achievable in circumstances where the development is of a mixed use, as opposed to the restricted use class that the RIS allocation supports, and one that is further constrained by restrictive planning conditions pursuant to an extant planning permission.
14. Notwithstanding the St Modwen representations submitted in September 2015, the SHLAA was published 2 months prior to that. In brief, the SHLAA methodology at paragraph 2.3 of the 2015 Assessment, states that potential sources of supply should include:

***'land allocated in plans for employment and other uses' and 'unimplemented /outstanding planning permissions'.***

15. However, the SHLAA goes on to say at paragraph 2.7 that sites in

***'areas identified in the Employment Land Study as appropriate for retention'***

are excluded.

16. The St Modwen site was not, (and should have been at the time of the SHLAA being prepared), assessed as a potential development site for housing.
17. The NLP 2014 Employment Land Review does not, in reporting on the availability of land, state that the RIS must be retained and therefore we considered it should have been assessed within the SHLAA. It states the following at paragraph 4.25:

***'Data collated by SMDC suggests that there is currently around 17.13ha of 'available' B-class employment land across Staffordshire Moorlands. It should be noted that this supply does***

***not include the Regional Investment Site (RIS) at Blythe Bridge. This site was allocated in the Staffordshire Moorlands Local Plan under Policy E2 since it was identified as a special-case 'Premium Employment Site' in the Structure Plan to serve the aspirational needs of the North Staffordshire Sub-Region. It was retained in the RSS Revision (but rebadged as 'RIS'). It was subsequently granted outline planning permission in 1997 (recently renewed). To date there is only reserved matters approval pertaining to a single 1.44ha 'plot' of the wider site (uncommenced). Although it is a commitment of 50 hectares it does not count against the Core Strategy requirements, because it is considered to be a strategic provision for North Staffordshire rather than being specific to the Staffordshire Moorlands'.***

18. The NLP Report does not commit the RIS site to being retained, but does suggest that investment is needed (paragraph 4.26) to improve the quality of key employment sites. Investment of course will be possible where a scheme is viable and deliverable and it is through making these representations that St Modwen seek to achieve this for Blythe Vale.
19. Given the absence of any firm conclusion relating to the retention of the RIS site in its current form, the Council should have included it within the SHLAA at the time of its preparation in July 2015.
  - ***"is deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity."***
20. The SHLAA (2015) identifies the land that has been assessed as part of the Council's consideration of suitable housing land. As detailed above, in the case of Blythe Bridge and Forsbrook, the Council did not assess the St Modwen site when preparing the SHLAA in July 2015. This approach taken at that time was flawed, given that within the Local Plan Boundary, the St Modwen site (and the adjoining land south of the A50) is the only site at Blythe Bridge and Forsbrook that is not within the Green Belt.
21. We prepare a comparative assessment of the St Modwen site to supplement those sites assessed by the Council within the SHLAA (within Section 5.0 of our Evidence Base Report) and this clearly demonstrates the suitability of the St Modwen site for allocation within this consultation document.
22. We are not aware that there is an assessment of infrastructure capacity within the current Local Plan Evidence Base that would enable the Council to conclude that the level of housing requirement, afforded to the Local Plan or indeed the settlement of Blythe Bridge and Forsbrook, is appropriate or indeed constrained by infrastructure capacity.
23. In respect of the potential for allocating the St Modwen site, we have reviewed the infrastructure capacity of the settlement of Blythe Bridge and Forsbrook, and present a review of services and facilities within the accompanying Evidence Base Report at Section 5.0.
  - ***'provides a more balanced range of social, economic and environmental effects'***
24. Given that neither the SMBC Local Plan consultation document nor its evidence base assesses the potential of the St Modwen site to deliver housing or a mixed use scheme, there has been no assessment of the balanced range of these environmental effects.

25. It is our view that the Housing Requirement for SMBC should be at least 440 dwellings per annum. This position is based on the following:
- i. SMDC's appointed Nathaniel Lichfield and Partners (NLP, January 2016) to undertake OAN analysis to determine whether an increase to the OAN proposed by the Council can be justified.
  - ii. The NLP report presents eight demographic-led scenarios for growth. All eight scenarios include an additional 10% uplift to assist in alleviating market signals pressure, in line with best practice determined by Planning Inspectorate decisions (see Eastleigh and Uttlesford Local Plan decisions). A further 10% uplift is applied for affordable housing need.
  - iii. We consider the most appropriate scenario to follow is the 'policy-off' economic-led scenario whereby the net commuting ratio is maintained at the existing level, and the level of housing required to support the Oxford Economics forecast is determined. NLP describe this scenario as follows: "*This represents the 'unconstrained' potential of the area based on its existing business base, mix of sectors and inherent economic qualities.*" In this context, the PPG (ID2a-004) states how "*plan makers should not apply constraints to the overall assessment of need*". NLP's 'policy off' scenario complies with the OAN methodology set out in the PPG. **Growth of at least 438 dpa (rounded to 440 dpa) is therefore considered justified and Barton Willmore's view is that this should be considered as full OAN for SMDC, from the evidence contained in the NLP OAN report.** We acknowledge that this would have the effect of reducing the five year housing land supply position further from the 1.64 years determined against OAN of 320 dpa, however SMDC should not seek to constrain their Housing Requirement simply because of them facing a challenging five year housing land supply position.
26. We also consider that the distribution of that requirement should be reconsidered and that a greater proportion should be afforded to the settlement of Blythe Bridge and Forsbrook. This is based on the distribution within Table 3.2 of the Consultation Document, which only allocates 1,228 (28%) of the housing requirement to the Rural Areas, with the settlement of Blythe Bridge and Forsbrook classified as one of the settlements that make up this Rural Area.
27. If the Housing Requirement were increased to 440 dpa, this would equate to an additional 638 dwellings within the Rural Area (assuming the same proportions as currently applied by the Local Plan). Blythe Bridge and Forsbrook receives 15% of the new allocations growth afforded to the Rural Areas. 15% of the increased Rural Area Growth would equate to circa additional 97 dwellings that could be required in Blythe Bridge and Forsbrook. We have not sought to attribute any of this increase to 'small sites' which are effectively windfall sites and given the nature of Blythe Bridge and Forsbrook and its tightly constrained boundaries, the rationale would be for any additional growth to be on an allocated site or sites, not a windfall. Our assessment of the sustainability of the settlement of Blythe Bridge and Forsbrook, within Section 5.0 of the accompanying Evidence Base Report, clearly demonstrates that a larger proportion, (and a larger proportion within an increased overall Housing Requirement) is justified.
28. It is our view that in considering the distribution of development, a greater proportion could be afforded to the larger, more sustainable settlements within the Rural Areas. Some of the larger villages are significantly more urbanised with a strong base of services and facilities to serve existing and new residents. These settlements include Blythe Bridge and

Forsbrook and Werrington for example. The following table, extracted from our accompanying Evidence Base Report clearly demonstrates the offer of services and facilities at Blythe Bridge and Forsbrook that outweigh other Large Villages in the Borough and rival those within the three main towns. The Council within the next stage of the Local Plan, when forming policies, may wish to consider a new designation of 'Main Rural Centre' that could be afforded to certain Larger Villages, recognisant of their role and potential for growth.

Settlement	Existing category	% housing Allocated	Railway station	First/ Middle School	High School	Health Care Provision	Post Office	Public house	Library	Bank
Leek	Town	34.6	x	✓	✓	✓	✓	✓	✓	✓
Biddulph	Town	25.4	x	✓	✓	✓	✓	✓	✓	✓
Cheadle	Town	40	x	✓	✓	✓	✓	✓	✓	✓
Blythe Bridge and Forsbrook	Larger village	15.2	✓	✓	✓	✓	✓	✓	✓	✓
Cheddleton	Larger village	15.9	x	✓	x	x	✓	✓	x	x
Endon	Larger village	8.6	x	✓	✓	✓	x	✓	x	x
Froghall	Larger village	6.3	x	✓	x	x	x	x	x	x
Werrington	Larger village	14.1	x	✓	✓	✓	✓	✓	✓	x

\* Table refers to new allocations only. It does not include small sites allowance or slippage allowance.

\* For main towns - % of Houses Allocated to each new settlement determined against the total number of new allocations for towns

\* For larger villages - % of Houses Allocated to each new settlement determined against the total number of new allocations for larger villages

29. What is evident from the above Table is the availability of a Railway Station within the settlement that affords excellent connectivity to the wider area, with the station being located on the Crewe to Derby rail line. Stoke can be accessed by train within just 12 minutes, on an hourly service from Blythe Bridge and provides local residents with access to a wide range of job opportunities and retail outlets, and Manchester is just over an hour away with a single interchange.

30. Bus services are available on the Uttoxeter Road, adjacent to the site and provide a frequent (every 20 minutes) service to the railway station, and Blythe Bridge and Forsbrook is connected to Hanley and Cheadle by bus too. The NPPF, at para 30 is clear in its support for the location of planned development to facilitate the use of sustainable modes of transport.

## 2. Do you have any comments regarding the proposed employment requirement for the Local Plan?

31. We note that the Consultation Document refers to the range of additional employment land as being between 25-45 ha of land to support the identified 320 homes per annum. Given the case we make within our response to question 1, we consider that the overall employment land requirement should be balanced against any increase in housing requirement. We also note that the Council has chosen to support a mid point within the range, at 35ha. Again, this is just 1.5ha above the current Core Strategy level of employment land. This does not point to a Local Plan that is seeking to be aspirational or responsive to growth opportunities.
32. The residual requirement for new employment land, once completions and commitments are accounted for, is only 19.4ha across the Borough. Just 6.37ha is identified as the residual requirement for the rural areas, which includes Blythe Bridge and Forsbrook. St Modwen's advisors, JLL have prepared a paper that focuses on the matter of employment land and this is appended to these representations. Section 5 of that paper refers to Employment Land Requirements and should be read alongside these comments. The paper seeks clarity on the calculation of the residual land requirement of 19.4ha and also explore the risks of the Rural Areas delivery of employment land, given that only one site (Cresswell) is allocated to meet this need for the entire District.

### **The Rural Area Allocation**

33. We note that during this period of consultation on the Local Plan that outline planning permission has been granted (24<sup>th</sup> May 2016 ref. SMD/2014/0576) for a mixed use development of residential (up to 168 dwellings) and B1/B2/B8 uses on land that includes the draft allocation at Cresswell. The entire allocation of employment land is proposed within the scheme for B1/B2/B8 uses, amounting to 33,480 sqm of employment floorspace. However, this site is not being marketed and it is not clear how deliverable it is. JLL question its suitability and marketability as access to the A50 is relatively constrained.
34. Within the Committee Report (dated 26<sup>th</sup> February 2015) the officer summarises the applicant's case for development. The applicants are referred to in the Committee Report as having submitted further information to support the principle of development and page 7.2 reads:

***'There is an element of 'enabling' development required on this site and the level of housing proposed reflects the significant infrastructure requirements for creating a suitable and 'sustainable' location for much needed housing and employment. The Council's recent Employment Land Requirements Study (ELRS) (July 2014) suggests that the cross subsidy of new employment units from residential development may be necessary in order for the District to meet their requirements, particularly in order to encourage improvements to existing employment sites.'***

35. Albeit the Committee report goes on to state at page 7.13 that the proposed housing development has not been categorically put forward as either enabling or cross subsidised in respect of delivering the industrial/business part of the scheme.
36. The Committee report summarises the consultation responses, and it is notable that given Cresswell is not a village or settlement within the Spatial Strategy, that Planning Policy officers could not support the planning application on the grounds of sustainability. Officers recommended refusal of the application based on the sustainability concerns given the

settlement was not supported by the Spatial Strategy, albeit Members approved the scheme at planning committee. The absence of a five year housing land supply and balance of uses was a determining factor. By direct comparison, Blythe Bridge and Forsbrook is a Larger Village, already acknowledged with a role within the distribution of the Local Plan Housing Requirement, and where officers have already sought to identify new sites (albeit within the Green Belt) for housing development. The St Modwen site already benefits from an allocation, an extant planning permission and the case that St Modwen make for a mixed use scheme, with cross funding and enabling development is entirely consistent with the principles that underlie the recently approved Cresswell proposals, as referenced within page 7.2 of the Committee report.

### **Blythe Bridge Employment Site (Blythe Vale RIS)**

37. Based on the evidence available, the employment allocation at Blythe Bridge and Forsbrook appears to be made in respect of serving a Regional Need, as opposed to local needs. However it is St Modwen's view, as presented in the accompanying JLL paper, that the St Modwen site is well placed to accommodate and attract local requirements as well as strategic requirements. Moreover, we see both local and regional markets as complementary, rather than being mutually exclusive.
38. The Consultation Document suggests at paragraph 3.19 that the RIS (i.e. St Modwen's land and land allocated to the south of the A50,) *'may have a role to play in supporting the Northern Gateway Regeneration Initiative.'*
39. The Northern Gateway Development Zone (NGDZ) is an initiative supported by the two LEPs of Stoke and Staffordshire and Cheshire and Warrington. The two LEPs see this Zone as a potential opportunity to establish high economic and housing growth predicated on HS2 investment in the area. Senior officers from the LEP and composite LPAs attended MIPIM in London during October 2015 to boost the awareness of the Initiative. The unknown timescales, uncertainty of the Phase 2 HS2 station at Crewe/Stoke on Trent, funding and potential for the site to have the necessary strong links with HS2, mean that there is a disconnect between the aims of St Modwen to deliver development within the next five years on this site, and the potential for it to tie into a Gateway Initiative that is still within its fledging stages.
40. The Blythe Vale site represents a scheme that has been identified, allocated and consented over a period of almost 30 years, as a site offering strategic potential. The accompanying JLL paper explores delivery at section 6. The site is yet to come forward however there are initiatives within the local area (i.e. HS2, the growth ambitions of the LEP) that will assist over a period of time. In order to prime this delivery, St Modwen are proposing a more favourable mix of uses on the site, to include a broadening of the B Use Classes and residential development to assist with the viability and delivery of the site. It is St Modwen's position that part of their site, and the land south of the A50 can still offer employment opportunities, however, in order to facilitate development occurring on this site within the next five years, and with certainty within this Plan Period to 2031, a broader mix of uses is more appropriate. However, delivery of the site has also been obstructed by the infrastructure required to service Phase 1 and the reliance Phase 2 places on the successful development of Phase 1.
41. Phase 2 takes in land to the south of the A50 and forms the largest part of the site. This part of the site forms the most obvious location for any large inward investor. However, Phase 2 is effectively landlocked as we understand no direct access from the A50 is likely to be permitted. As such, the Development Brief requires a crossing by bridge (or bridges if both are single carriageway) from the Phase 1 land in order to access the Phase 2 land.

42. The Phase 1 land can be accessed from the A521. However, the technical solution to create a robust access, which has detailed planning permission, is expensive. Delivering this access requires up-front investment and despite a significant improvement in market conditions, the funding of industrial and office development remains challenging. This is evidenced by the relatively few speculative developments undertaken within the wider region since the recession of 2009 to 2012.
43. Essentially, without external funding, the development of the first phase for just B class uses is unlikely to be viable. Instead, other more valuable uses, such as residential (including affordable housing), a local centre and leisure (e.g. a pub/restaurant), are required in order to enable the traditional employment elements (i.e. B class) of the scheme. These uses can all be delivered without altering Green Belt boundaries.
44. The mix of uses needed to fund the infrastructure requirements of the overall development of the first phase is currently being reviewed. It should be noted however, that a local centre and leisure uses, whilst not traditional B class employment uses, will generate new jobs and economic development.
45. To conclude, the allocation at Blythe Bridge is carried forward from the previous Core Strategy to this Local Plan and reflects the site being a commitment to the employment land supply by virtue of the extant planning permission on this site. St Modwen are wholly supportive of the development of this site, but consider (and explored more fully in our supporting Evidence Base Report and the accompanying JLL paper) that a more attractive opportunity, that will deliver benefits to the local community of Blythe Bridge and Forsbrook, would be for a mixed use development comprising housing, employment and ancillary development.

**Q5. Do you have any comments to make regarding the potential infrastructure requirements in the Local Plan?**

46. We note that the Consultation Document refers to the future preparation of an Infrastructure Delivery Plan and we reserve our position to comment on that in due course. We have reviewed the availability of services and facilities within Blythe Bridge and Forsbrook and these are highlighted within Section 5.0 to our Evidence Base Report. We consider that there are services and facilities within the settlement that can support new homes and employment opportunities proposed by St Modwen on their site.

**Q33. Do you have any comments on the village boundaries for the Rural Areas?**

47. St Modwen welcome the inclusion of their site within the Village Boundary, as shown on Map 4.13 within the Consultation Document. The Village Boundary is constrained by the Local Plan Administrative Boundary to the west, and Green Belt to the North West, North, and East. The A50 forms a strong barrier to the south of the settlement, through to the roundabout with the A50/A521. The St Modwen site, and third party land to the south of the A50, south west of Blythe Bridge and Forsbrook, form a significant area of land that is not constrained by designations, e.g. Green Belt.
48. St Modwen's land extends primarily to the north A50 and is a natural extension of the settlement. The site has previously been identified within the adopted Core Strategy (2014) and the Staffordshire Moorlands Local Plan before that (1998) as being a site suitable for development.
49. St Modwen remain supportive of the site being identified for development, and within the village boundary. Given the need for housing within Staffordshire Moorlands and the

suitability of Blythe Bridge and Forsbrook as a location for new housing, St Modwen consider this supports a case for the identification of Blythe Vale as a mixed use development site.

50. We note that the Council have chosen to release additional land from the Green Belt for housing, north of Blythe Bridge and Forsbrook. We comment on this within our response to questions 37/38, below.

**Q. 36 Do you have any comments on the suggested Green Belt amendments for the Rural Areas?**

51. The St Modwen site that comprises part of the allocated site known as Blythe Vale, is not within the designated Green Belt of Staffordshire Moorlands, and neither does the development of this site require the further release of Green Belt land.
52. The Staffordshire Moorlands Local Plan (1998) replaced the North Staffordshire Green Belt Local Plan and made amendments to the inner boundaries of the Green Belt around Blythe Bridge and Forsbrook, associated with the construction of the A50 which created enclosed land which could be readily parcelled for development. The amendments left what the SMBC Green Belt Review (2015) terms as a '*rather incongruous boundary*' (section 5.4) with land between the St Modwen land and the land that comprises the remainder of the RIS, south of the A50.
53. We support the suggested realignment of the inner Green Belt Boundary illustrated on Figure 5.1 of the Consultation Document, and consider it appropriate that the Site, which has been identified for development in excess of 20 years, is brought firmly within the settlement boundary of Blythe Bridge and Forsbrook.
54. The Green Belt Review (2015) also identifies potential sites for release from the Green Belt. Six sites are reviewed as having potential to be released from the Green Belt at Blythe Bridge and Forsbrook, out of a total of ten that were considered within Appendix C of the 2015 Review. The conclusions at Table 5.1 of the Green Belt Review in respect of the sites assessed at Blythe Bridge and Forsbrook suggest that the action for the Local Plan is to:

***'release under exceptional circumstances, plus amendment of the village boundary to accommodate proposed development.'***

55. We are not aware of the Local Plan or Evidence Base presenting any exceptional circumstances that would justify the need for Green Belt release at Blythe Bridge and Forsbrook, or that have been used to support the identification of two potential housing sites (BB041 and BB054) for a total of 120 new homes. It is our view that in seeking to accommodate the housing requirement (or any additional requirement) afforded to Blythe Bridge and Forsbrook, that the Local Plan and its evidence base should have considered the opportunity of locating residential development at St Modwen site at Blythe Vale, as opposed to remaining silent on it. We acknowledge that the Green Belt Review (Appendix C) states that both BB041 and BB054 are '*well enclosed,*' however this is far from being an '*exceptional*' circumstance. Indeed the Review states that both sites perform a function of the Green Belt in terms of preserving the setting of the settlement and preventing encroachment. In respect of BB054 the Green Belt Review states that development of the site would be '*incongruous*'.
56. The St Modwen site has already been excluded from the Green Belt and the principle of development has been established firmly through the continued allocation of the site for employment use (the previous Local Plan and the Core Strategy) and the Outline Planning



Permission (11/00405). Its development in part for housing would not require the alteration of the Green Belt boundary. Indeed the potential to accommodate housing on this site is further evidence to suggest that exceptional circumstances do not exist to justify removing BB054 or BB041 from the Green Belt.

**Q.37. Do you have any comments on the housing allocations for the Rural Areas?**

57. Our principle comments in respect of the two housing allocations relate to the absence of evidence presented by the Council to justify the need for Green Belt release, in the context of there being alternative land i.e. Blythe Vale, available for development, but not assessed by the Council.
58. Site BB054 is identified for release from the Green Belt for housing, however given the proximity of the River Blithe and the nature of the constrained points of highways access, onto a narrow country lane, we question the appropriateness of this allocated site, compared to the availability, suitability and achievability of Blythe Vale.
59. In summary, we believe that additional housing sites should be identified at Blythe Bridge and Forsbrook but also that exceptional circumstances have not been demonstrated for BB054 and BB041. BB054 in particular appears to have additional technical constraints that have yet to be explored.

**Q38. Do you have any comments on the employment site for the Rural Areas?**

60. Table 4.18 of the Local Plan Consultation Document allocates site OC055 (Cresswell) for employment use, amounting to 8.58 hectares. Table 3.3 of the Consultation Document also provides detail on the distribution of employment land within the Borough. The 35ha of land (Gross Requirement) is distributed across Leek, Biddulph, Cheadle and the Rural Areas. The Rural Areas receive 10.5 ha of this total, of which the residual requirement is 6.37ha. It is not clear from the Document or evidence base how this 6.37ha residual requirement relates to the Gross Allocation of 8.58ha and request this be clarified. We would also refer to our earlier comments in response to question 2, regarding the rural area allocation at Cresswell.
61. Within Blythe Bridge and Forsbrook, there are no employment land allocations made to serve local needs. St Modwen's employment land advisors, JLL, have indicated that the principal market sectors that could be attracted to Blythe Bridge and Forsbrook are likely to include small to medium size industrial and warehousing (i.e. local market) as well as more strategic requirements.
62. Whilst Blythe Bridge and Forsbrook boast excellent road and rail connectivity, new homes, and a strong and varied base of facilities and services, the Local Plan has failed to allocate any employment land to serve local needs to this area. The largest area of local employment land is the Meyer Timber factory, located outside of the settlement on the south side of the A50. There are further employment opportunities within the retail park south of the A50, west of Blythe Bridge and Forsbrook village, where large stores include Tesco, Aldi, B & Q - albeit the range of jobs within the B Use Class are more limited.
63. The St Modwen proposals present an opportunity for a mixed use development site. The principle of employment use has already been accepted on the St Modwen site at Blythe Vale and the site benefits from an extant planning permission. St Modwen have sought to bring the site forward, having extended the time on the original planning permission in 2011 (11/00405/REM), and having previously secured consent for the access to serve the site in 2007 (01/00125/REM). However, despite being experienced developers in this field, the

site has been difficult to progress, largely because of the development's viability and the market for office accommodation in this location. St Modwen have applied for Growth Funding in an effort to unlock the potential of this site, but there is no certainty as to whether this bid will be successful and it will take time for the bid to be processed.

64. In short, the site's potential is arguably best unlocked by a mix of uses, residential and employment that can be delivered through a more flexible and attractive, market facing planning permission. Moving away from the restrictions of the Development Brief to reflect the requirements of modern business will also be important, as is acknowledged by the Core Strategy, including addressing the building heights for example and ensuring the use class is not limited to Class B1.

**Q39. Do you have any comments on the Northern Gateway Opportunity Site?**

65. St Modwen own part of the land that is allocated as the Northern Gateway Opportunity Site, referenced as Blythe Vale RIS within Table 4.19 of the Consultation Document.
66. The concept of Regional Investment Sites (RIS) was promoted by the West Midlands Regional Spatial Strategy (and the Regional Planning Guidance before that) over 25 years ago. RISs were intended to be multi-occupied sites of 25-50 hectares, to support the delivery of Regeneration Zones and High Technology Corridors, and to attract high quality occupiers who were nationally or internationally footloose. They were principally restricted to Class B1 and B2 (where appropriate).
67. The NPPF recognises and emphasises the importance of using up to date market signals, particularly in terms of plan-making (Paragraphs 17, 22 and 158). In addition, due reference is made to market factors in PPG, particularly with reference to the three principal tests of allocating development land - suitability, availability and achievability.
68. The accompanying JLL paper summarises the more flexible approach that has been taken to other RISs across the West Midlands, (paragraphs 4.6 – 4.11.) A recent example of relevance here is the Blythe Valley Business Park within Solihull MBC. The Solihull Local Plan - Inspector's Report: November 2013 included the following observations:

***"36. Both Birmingham and Blythe Valley Business Parks were originally designated as "Regional Investment Sites" (RIS) in the former WMRSS, restricted to Class B1 uses. With its revocation and changes in the economy and business demand, there is a need for this concept to evolve and for these business parks to be reinvigorated, without detracting from their regional economic significance. The ELR examined the changing role of these RISs [SLP016], and confirmed the need to broaden the range of uses at these key regional employment sites." [our emphasis]***

***"83. Proposals to incorporate new housing (600 dwellings) within Blythe Valley Business Park (Site 10) are controversial, not only because of the implications for this former RIS in economic terms, but also because of its scale, impact and relationship with the surrounding area, including Cheswick Green. However, the proposal is justified due to the need to re-invigorate the development of the business park and to deliver economic objectives, and is strongly supported by the developers. It would also help to provide a***

**more sustainable, multi-dimensional community on this rather detached development, with a sense of place, but without diluting its regional economic importance. The traffic impact on motorway junctions and road links has been investigated and there are no objections from the relevant highway authorities. Both Solihull Metropolitan Borough Council and developers argue that it would be very difficult to deliver and complete this business park without a vital element of residential development.** [our emphasis]

**"84. Although the possibility of housing development was not favoured at the former WMRSS EIP, the SLP has to recognise changing circumstances; this type of development would help to complement and sustain the business park, as well as encouraging sustainable economic growth and promoting mixed-use development, in line with the NPPF (¶ 19-21). Other former RISs in the West Midlands include residential uses in their development (such as at i54 & Longbridge), and a site allocation of some 12ha would represent a modest reduction of the remaining 32ha of employment land without squandering the asset. The development would be separated from Cheswick Green, but there may be the possibility of improving transport and footpath links with this nearby settlement as part of the master-plan...Consequently, the proposal is justified, effective and consistent with national policy, reflecting the evolving role of the business park and helping to ensure the delivery of economic objectives."** [our emphasis]

69. Whilst we acknowledge that the adopted Solihull Plan was successfully challenged through the Courts in 2014, this challenge was on the principle of the absence of meeting full objectively assessed needs and the failure of the Plan to modify the Green Belt in response. The challenge did not question the Inspectors conclusions in respect of the suitability of mixed use development on the RIS. The Solihull case is a clear, recent example of the approach that Local Plans should take towards RISs in the context of the NPPF and reflecting market signals.
70. The PBA/JLL West Midlands Strategic Employment Site Study (September 2015) (WMSESS) notes that the RISs serving the metropolitan area of Birmingham have been successful, with high occupancy. However, whilst intended to support diversification and modernisation of the West Midlands economy, the report notes that it is particularly apparent that there are a significant number of locally based operators that have located to RISs.
71. The JLL paper refers to the WMSEES and that previously, the location of sites was driven by the need to be close to resident and unemployed workers (i.e. in the Regeneration Zones). Now, the report considers the market should be a bigger driver.
72. JLL also refer at paragraph 4.3 to the merging of manufacturing and distribution into one market and the distinction between B1c/B2 and B8 not always being possible to make. The only importance in terms of planning use is the impact of each use and how it may differ in terms of hours of use, vehicle movements and the types of jobs created.

73. This 'blurring' is important to consider for Blythe Vale, given that the site has been limited to B1 uses by way of the Development Brief. The Adopted Core Strategy acknowledges this and in light of more up-to-date planning guidance and changing economic and transport needs, the adopted Core Strategy (2014), at para 8.1.78 recognises the need for the original 1997 development brief to be reviewed, "*which will also give an opportunity to address the scope for accommodating other supporting uses as well as reassessing highways and other transport requirements*". We support reference in the Core Strategy to revise the Development Brief to accommodate a wider range of uses at the Blythe Vale RIS and consider that the Local Plan should equally make this reference when new policies are prepared in subsequent stages of the Local Plan.
74. It remains St Modwen's firm view, as evidenced within the JLL paper, that the allocation of employment land at Blythe Vale (including if this is part of a mixed use scheme) should not be restricted to specific sectors, and should be market driven and include both ancillary and enabling development.
75. The introduction of a more flexible range of employment uses which meet a local need alongside a regional one, coupled with a residential element on part of the site is necessary. This will open up the opportunities for cross funding, early delivery, the provision of infrastructure that serves the wider RIS and unlocking the potential of this site in order that it can be a truly sustainable Gateway to the Borough.

### **Conclusion**

76. Blythe Vale presents an opportunity to deliver a very high quality sustainable, mixed use development on non-Green Belt land, within the village boundary of Blythe Bridge and Forsbrook. After years of being identified, but frustrated by viability the Local Plan review provides the opportunity for the policy context for the site to be revisited.
77. St Modwen seek to introduce a wider range of uses within Class B to the site, which is an approach considered and supported in the accompanying JLL paper. The widening of the uses to cover B1/B2/B8 will enhance the attractiveness of the site to future developers/investors/operators and the broadening of the uses within this Class is consistent with the approach taken to other RISs within the West Midlands. In May 2016, SMDC granted planning permission for a mixed use site at Cresswell. The application site included employment land that is identified within the emerging Local Plan. The delivery of employment land, as part of a mixed use proposal is therefore a recent and relevant precedent already accepted by the Council.
78. There are also opportunities to deliver ancillary development – a local centre or public house. Connectivity to the urban area of Blythe Bridge and Forsbrook can be enhanced through off site highway improvements – a pedestrian crossing for example to encourage walking between the site and Blythe Bridge and Forsbrook's range of services and facilities. A well designed residential development could be accommodated within the local landscape with minimal impacts upon the wider landscape character and visual resources.
79. The enabling development will cross fund the provision of access, and provide for on-site employment opportunities and the potential for the land south of the A50 to be delivered too, which is currently land locked.
80. We trust that the above comments are helpful to officers in developing the next stage of the Local Plan and in forming policies to accompany the site allocations. We would welcome the opportunity to work closely with officers in the evolution and preparation of our evidence

base that we consider supports the Local Plan and our case for allocating land at Blythe Vale for mixed use development.

81. Please do not hesitate to contact myself, or Richard Hickman, Planning Manager at St Modwen ([rhickman@stmodwen.co.uk](mailto:rhickman@stmodwen.co.uk)) for further information.

Yours sincerely



**JOANNE RUSSELL**

Director

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# Blythe Vale, Blythe Bridge, Staffordshire Evidence Base Report

Staffordshire Moorlands Local Plan: Preferred Options

On Behalf of St. Modwen Developments Ltd

June 2016



**Blythe Vale, Blythe Bridge, Staffordshire**  
**Evidence Base Report**

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<b>Checked by:</b>	JR	JR	JR	KV
<b>Authorised by:</b>	JR	JR	JR	KV

Barton Willmore LLP  
Regent House  
Prince's Gate  
4 Homer Road  
Solihull  
B91 3QQ

Tel: 0121 711 5151  
Fax: 0121 711 5152  
Email: [joanne.russell@bartonwillmore.co.uk](mailto:joanne.russell@bartonwillmore.co.uk)

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## 1.0 INTRODUCTION

### Background

- 1.1 Barton Willmore on behalf of St Modwen Developments Ltd ('St Modwen') have prepared this evidence base report to support their Representations that have been submitted in response to the Local Plan: Preferred Options Site and Boundaries consultation. St Modwen own land within the Blythe Vale Regional Investment Site, allocated within the adopted Staffordshire Moorlands Core Strategy (2014) and carried forward into this consultation document. A plan is included at **Appendix 1** that identifies the land owned by St Modwen and how it relates to the wider RIS site. The site is located to the south east of Blythe Bridge and south of Forsbrook.
- 1.2 For the purposes of this report we will refer to the Site as 'Blythe Vale' and the settlement within which the site is located, as Blythe Bridge and Forsbrook.
- 1.3 Policy SS8 within the adopted Staffordshire Moorlands Core Strategy 2014 allocates the RIS (a total of 48.58ha) as a high quality employment site for Class B1 and where appropriate Class B2 uses to meet the region's economic needs.
- 1.4 The Local Plan Preferred Options Site and Boundaries consultation document maintains the allocation of the RIS, referencing the site as a 'Northern Gateway Opportunity'. We consider that the Local Plan should revisit Policy SS8 (at the next stage of preparation, when we understand policies will be drafted) and the allocation, and introduce flexibility to enable a mixed use scheme to come forward on the St Modwen land;
- to unlock the delivery of the site by way of attracting a mixed use development that improves viability;
  - to cross fund the highways infrastructure that serves the site, including land south of the A50;
  - to attract a wider range of employers, potentially including local businesses;
  - to enable a less restricted use on the site, noting the previous conditions applied to the extant planning permission for example regarding building heights;
  - to provide suitable, available and deliverable housing land to help deliver the Council's uplift in its housing requirement up to 2031; and
  - to reduce the reliance on additional land being released from the Green Belt.

1.5 This report provides the case to support a mix of uses at the Blythe Vale site which we consider will improve the viability and prospects for delivering this site and assisting in SMDC in meeting their growth requirements.

1.6 The NPPF is clear in its support for mixed use developments. One of the core planning principles of the NPPF (para 17) states that planning should:

**'promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas'**

1.7 This report provides a description of the site planning history and site context (Section 2); a brief summary of the current planning policy context and the background policy (Section 3); the case for housing growth (Section 4); the suitability of Blythe Bridge and Forsbrook for mixed use development (Section 5); and an assessment of the deliverability of the site (Section 6). This report is appended by a paper (**Appendix 2**) prepared by St Modwen's advisors on employment land, that considers relevant employment land issues and market signals that concern the future procurement and delivery of Blythe Vale.

## 2.0 SITE PLANNING HISTORY AND SITE CONTEXT

- 2.1 The St Modwen land forms part of a larger site which is allocated in the Adopted Staffordshire Moorlands Core Strategy 2014 as a Regional Investment Site. The site also benefits from an outline planning permission (ref 11-00405/REM1\_MJ) granted 9<sup>th</sup> August 2011 for employment uses consistent with its allocation. This permission replaced the then extant planning permission 06/00984/FUL, pursuant to the original outline planning permission SM.97-0216 that had been granted on 30<sup>th</sup> July 1997. The planning history is summarised below and the historic planning policy context is within Section 3.
- 2.2 Condition 2 (ref SM.97-0216) required any application for approval of reserved matters to be made not later than the expiration of 6 years from the date of the planning permission (i.e. 29<sup>th</sup> July 2003) and the development to begin whichever is the later of the expiration of 10 years from the date on which the permission is granted or the expiration of 4 years from the final approval of the reserved matters or in the case of approval upon different dates, the final approval of the last such matter to be approved. Condition 4 confirms that the development of the land shall be for no other uses other than within Class B1.
- 2.3 Planning permission reference 03/00498/FUL\_MJ granted on 15<sup>th</sup> July 2003 varied condition 2 of Planning permission SM.97-0216 to extent the period of time to submit reserved matters. Condition 1 requires reserved matters to be submitted before the expiration of 5 years from the date of the planning permission and the development to begin no later than the expiration of 8 years from the date of the planning permission or 3 years from the final approval of the reserved matters or in the case of approval on different dates, the final approval of the last such matter to be approved.
- 2.4 Planning permission reference 06/00984/FUL granted 17<sup>th</sup> October 2006 approved the variation of Condition 1 of planning permission 03/00498/FUL\_MJ to extent the time period in which to submit reserved matters by a further five years to July 2013. Condition 1 requires any application for reserved matters approval to be made not later than the expiration of 10 years from the grant of planning permission 03/00498/FUL\_MJ (i.e. 14<sup>th</sup> July 2013). The development shall be begun whichever is the later of expiration of 13 years from the date of the grant of planning permission 03/00498/FUL\_MJ or 3 years from the final approval of reserved matters, or in the case of approval on different dates, the final approval of the last such matter to be approved (i.e. backstop 14<sup>th</sup> July 2016).

- 2.5 Planning permission reference 11/00405/REM1\_MJ granted 9<sup>th</sup> August 2011 is the most recent, and extends the time limit for the submission of reserved matters to 15<sup>th</sup> July 2018 and the implementation of the permission to 15<sup>th</sup> July 2021. Condition 2 requires any application for reserved matters approval to be made not later than 15 July 2018 and the development to which permission relates to begin no later than 15<sup>th</sup> July 2021. It is this planning permission that benefits the site and against which St Modwen can still implement.

#### **Access**

- 2.6 Approval of reserved matters reference 01/00125/REM approved on 3<sup>rd</sup> April 2007 comprises provision of access to phase 1 of the employment site. Condition 1 confirms the application shall be exercised in conjunction with outline planning permission SM.97-0216 and shall not be construed as relieving the applicant of the requirement to comply with any of the requirements or conditions imposed on that consent. It is however noted that Condition 1 was varied by the extension of time planning permission 11/00405/REM dated 9<sup>th</sup> August 2011 (above) and can also still be implemented by St Modwen.

#### **Floorspace**

- 2.7 Approval of reserved matters reference 07/01532/REM\_MJ approved on 29<sup>th</sup> April 2008 comprises development of site 1 of phase 1 for class B1. Condition 1 confirms that this permission shall be exercised in conjunction with outline planning permission SM97-0216 and shall not be construed as relieving the applicant with the requirement to comply with any conditions imposed on the outline consent except as may be otherwise permitted by this consent. Condition 2 confirms that the commercial floorspace hereby approved shall be restricted to Class B1 Office use only. As above it is noted that Condition 1 on the outline permission was varied by the extension of time planning permission 11/00405/REM dated 9<sup>th</sup> August 2011. St Modwen can therefore seek to implement this reserved matters planning permission at the time of writing.

- 2.8 None of the above planning permissions have been implemented.

#### **Site Context**

- 2.9 Land in St Modwen's ownership/control is outlined in red on the plan within **Appendix 1**, outlined in red, and the site comprises an area of approximately 18.06 hectares. The majority of the land owned by St Modwen is located to the south east of the A521 and north of the A50. A small parcel of land is located south of the A50 roundabout, on the southern side of the A50. The site is concealed from the highway by the hedgerow/tree boundaries which restrict visibility into the site from the highway. The site lies at an

elevation of approximately 173 metres AOD and there is a ridgeline running north-west, south- east and north of the A50. Enveloping the site to the north-west is an existing wooded copse which curtails views towards the site from the north and west, and it is considered views from the south will be limited to those from a middle-long distance and from a higher viewpoint. The site is located south east of the settlement of Blythe Bridge, south of Forsbrook and to the west of Draycott village. The site is approximately 1.5km from Blythe Bridge Railway Station which is within an acceptable cycling distance and served by bus services which run along the Uttoxeter Road connecting the site to the Railway Station. The Railway Station is located on the Crewe to Derby railway line. East Midlands Airport is located approximately 37 miles to the east of the site, via the A50.



### 3.0 PLANNING POLICY CONTEXT

3.1 This section reviews current adopted planning policy for the Blythe Vale site and includes the planning policy background to its designation.

#### **Adopted policy**

3.2 Policy SS8 of the adopted Core Strategy, 2014 supports the development of a Regional Investment Site for high quality, regional scale employment development falling within use classes B1 and, where appropriate B2 at the Blythe Vale site.

3.3 We support the principle of development that is pursuant to the inclusion of Policy SS8 in the Core Strategy, however we consider the Policy should be amended to facilitate mixed use development. St Modwen look to include residential and local centre/leisure uses as part of a mix to enable employment development, and unlock the potential for the third party land to the south of the A50 that is also identified for employment use. This is discussed in greater detail in section 6.0 later in this Report.

3.4 A Development Brief for the Blythe Bridge Employment Site was adopted by SMDC in September 1997. The Development Brief promoted the site as a Premium Employment Site, consistent with the Local Plan policy of that time and is intended to provide guidance on design, landscaping and traffic matters and sets out the Local Authority's advice and requirements for the site's development. The basic concept is to create a high quality employment development.

3.5 In light of more up-to-date planning guidance and changing economic and transport needs, the adopted Core Strategy, at paragraph 8.1.78 recognises the need for the original 1997 Development Brief to be reviewed. This will also provide an opportunity to address the scope for accommodating other supporting uses as well as re-assessing highways and transport requirements on the RIS. We support reference in the Core Strategy to revise the Development Brief to accommodate a wider range of uses at the Blythe Vale RIS and consider that this positive emphasis should be reflected in the emerging Local Plan.

#### **Background policy**

3.6 The North Staffordshire Green Belt Local Plan was adopted in 1983 and this site was located within the North Staffordshire Green Belt.

3.7 The Staffordshire Structure Plan Explanatory Memorandum (December 1988) explained that there was a need to broaden the economic base of North Staffordshire by attracting

further inward investment. The availability of land, ready and suitable for employment development was one of the fundamental requirements in meeting this objective and although the current overall area of available industrial land was sufficient to meet demand based on a projection of past take-up rates, it did not match the full site requirements of the market in terms of type, quality and location. In particular there was a shortage of high quality large sites in North Staffordshire. Therefore, as part of the strategy for matching industrial land supply to market requirements, the Structure Plan 1986 – 2001 (approved March 1991) introduced Policy 4, that encouraged the identification of new Class B employment sites within Local Plans.

- 3.8 At the regional level, the Regional Planning Guidance for the West Midlands 1998 (PRPG) referred to 'Premium Employment Sites', and at paragraph 7.9 stated that:

**'There remains a notable absence of readily available high quality employment sites in the metropolitan area and the North Staffordshire conurbation'**

- 3.9 Paragraph 7.14 of the RPG set out the criteria to be met in the allocation of Premium Employment Sites. In respect of the North Staffordshire conurbation specifically, paragraph 7.18 of the RPG stated

**'There are a number of large sites within the conurbation, such as Sideway/Trentham and those along the A500 and A50 corridor, which offer opportunities for development... Uses should generally be restricted to high quality development within Class B1 of the Use Classes Order although, if a need can be demonstrated, high quality B2 uses will be acceptable.'**

- 3.10 A review of the Regional Planning Guidance for the West Midlands (which effectively cancelled the September 1995 version) also continued to recognise the site as a major strategic employment site for North Staffordshire proposing its inclusion as a 'Regional Investment Site'. Regional Spatial Strategies were subsequently revoked prior to the adoption of the revised West Midland Regional Spatial Strategy.

## 4.0 THE CASE FOR HOUSING GROWTH

- 4.1 The Staffordshire Moorlands Core Strategy, 2014 identifies a housing requirement of 300 homes per year over the period 2011 to 2026. It also establishes the distribution of development across the District with the greatest quantum of development in the towns of Leek, Biddulph and Cheadle and more modest scale of development in the rural villages.
- 4.2 An update to the Councils 2014 Strategic Housing Market Assessment has been carried out to take account of the Governments latest household projections, new population and employment data. The SNHP (sub-national housing projection) Update 2016 points to a revised housing objectively assessed need range of between 250 dwellings per annum and 440 dwellings per annum for the District over the period 2012 to 2031.
- 4.3 The Council is proposing an annual housing requirement of 320 dwellings per annum (dpa) across the District over the period 2012 to 2031. Having regard to the dwellings that have been completed since April 2012 the net residual requirement for the District is 4,158 up to 2031.
- 4.4 It is proposed that the majority (72%) of dwellings are located in the main towns of Leek, Biddulph and Cheadle with a more modest proportion to the Larger Villages. A 28% proportion of the net residual requirement is proposed to the Larger Villages (of which Blythe Bridge and Forsbrook is one) accounting to a total of 1228 dwellings.
- 4.5 Blythe Bridge and Forsbrook has been apportioned 15.2% of all new allocations across the Larger Villages. This is in addition to an allowance of 30 dpa that is made for small sites that are anticipated to come forwards from settlements within the Rural Area as windfall sites.
- 4.6 We consider that the Council should aim to meet a higher housing requirement closer to 440 dpa over the plan period. The chosen requirement of 320 dpa sits short of the mid-range point of the recommended requirement (that would be equivalent to 345 dpa) which is necessary to maintain jobs as at the present day.
- 4.7 The NPPF is clear, at paragraph 14 that

**'Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse**

**impacts of doing so would significantly and demonstrably outweigh the benefits’.**

- 4.8 SMDC are not presently able to meet their full objectively assessed needs of 440 dwellings per annum. The NPPF at paragraph 47 is also clear on the need to ‘significantly boost the supply of housing’ and it is therefore our view that the housing requirement of 320 dwellings per annum is not a positive response to this element of the Framework.
- 4.9 Based on a higher requirement of 440 dpa, there would be a need to deliver an additional 2,280 dwellings in the District over the Plan Period (i.e. 120 additional dpa, over a 19 year Plan Period). Using the spatial distribution of development proposed in the Local Plan Consultation, 28% of the additional growth would be directed to the Larger Villages equating to 638 additional dwellings to be identified.
- 4.10 The Local Plan does not include a detailed breakdown of the proportion of housing allocated to Blythe Bridge and Forsbrook, from within the Rural Areas category. However, 46% of all allocations across the Larger Villages are given over to a ‘small sites allowance’ (infill of 30 dwellings per annum). The remaining 54% is made up of ‘new allocations’ in the Larger Villages. Blythe Bridge and Forsbrook has been apportioned 15.2% of the new allocations within the Rural Area.
- 4.11 In adopting the higher housing requirement, which would meet the Full Objectively Assessed Housing Needs (in accordance with the Framework) it is our view that the additional 638 dwellings to be found within the Rural Areas, should not be assigned to the category of ‘small sites allowance’. This is because the Plan should seek to identify land for housing where possible within the first five years and within broad locations for years 6-10, and maintain a five year deliverable housing land supply. The Council cannot currently demonstrate a five year housing land supply and has not consistently been able to do so since 2009. Therefore, based on a 15% allocation of additional houses to Blythe Bridge and Forsbrook (as per the current spatial strategy distribution) this would result in an additional requirement of 97 dwellings (of the 638) to be identified at Blythe Bridge and Forsbrook, over the Plan Period.
- 4.12 Having regard to the capacity of the St Modwen site for housing development, as part of a mixed use scheme, we are confident that the site could accommodate this uplift in housing and also, accommodate housing that is currently being proposed on other sites identified by SMDC to be released by the Council through this Local Plan.

4.13 Above and beyond this, we consider there is a case for Blythe Bridge and Forsbrook to take a greater proportion of the housing growth proposed in the Local Plan. This redistribution could be achieved by a greater proportion of housing that is allocated to the Rural Area, being directed to Blythe Bridge and Forsbrook. The Council could also choose to secure greater certainty over the provision of new homes, by allocating housing on the St Modwen site rather than allowing for 46% of Rural Area housing requirement to be delivered through 'windfall' sites. Given the lack of a five year housing land supply within SMDC, we do not consider that it is appropriate to rely on almost half of the Rural Area housing to stem from windfall sites when there is an opportunity to deliver with certainty, housing on a non Green Belt site, and where the principle of built development has already been accepted. It is our view that the St Modwen site is suitable, for mixed use development having regard to its locational sustainability, lack of environmental and physical constraints informed by technical work, and the willingness of St. Modwen as landowner. This is detailed in section 5.0 of this report below.

## 5.0 SUITABILITY OF BLYTHE VALE FOR MIXED USE DEVELOPMENT

### Services and facilities within Blythe Bridge and Forsbrook

5.1 This section of the report assesses the sustainability of the settlement of Blythe Bridge and Forsbrook for mixed use development and compares it to the main Towns and Larger Villages (in part) across the Staffordshire Moorlands District.

5.2 The sustainability of Blythe Bridge and Forsbrook was assessed in a Halcrow Development Capacity Study (2011) produced on behalf of SMDC. This Study considered the suitability of Blythe Bridge and Forsbrook alongside other settlements in the District in terms of their accessibility, and social and physical infrastructure. Blythe Bridge and Forsbrook performed very well in all categories. This is discussed in more detail below.

5.3 Blythe Bridge and Forsbrook benefit from a range of services and facilities including shops, primary and secondary schools, employment opportunities at Meyer Timber (south west of Blythe Bridge) for example, and excellent road and rail linkages, boasting the only railway station in the District. A comprehensive list of services and facilities available at Blythe Bridge and Forsbrook is provided below:

- Library
- High School – Blythe Bridge High School
- Primary Schools – William Amory, Springcroft and Forsbrook CE Primary Schools
- Youth and Community Centre
- Village Hall
- Shops – Post office, pharmacy, opticians, newsagent, hairdressers, Co-op supermarket, gift shop, shoe shop, fitted kitchens, DIY outlet
- Financial and professional services – Bank, Building Society, Estate Agents
- Doctors
- Public Houses
- Churches – Anglican Church of St. Peters and Methodist Church
- Hot food takeaways and café
- Railway station within 1.5km of the site
- Regular bus services:
  - Connecting the site with the Railway Station every 20 minutes Monday to Saturday during peak hours
  - Connecting Blythe Bridge with Hanley every 20 minutes Monday to Saturday during peak hours
  - Connecting Blythe Bridge with Cheadle three times a day Monday to Friday

5.4 The table below provides a comparison overview of the services and facilities available in the market towns of Leek, Biddulph and Cheadle and in some of the Larger Villages (identified under Policy SS6a of the Core Strategy) across the Staffordshire Moorlands District.

Settlement	Existing category	% housing Allocated	Railway station	First/ Middle School	High School	Health Care Provision	Post Office	Public house	Library	Bank
Leek	Town	34.6	x	✓	✓	✓	✓	✓	✓	✓
Biddulph	Town	25.4	x	✓	✓	✓	✓	✓	✓	✓
Cheadle	Town	40	x	✓	✓	✓	✓	✓	✓	✓
Blythe Bridge and Forsbrook	Larger village	15.2	✓	✓	✓	✓	✓	✓	✓	✓
Cheddleton	Larger village	15.9	x	✓	x	x	✓	✓	x	x
Endon	Larger village	8.6	x	✓	✓	✓	x	✓	x	x
Frogghall	Larger village	6.3	x	✓	x	x	x	x	x	x
Werrington	Larger village	14.1	x	✓	✓	✓	✓	✓	✓	x

\* Table refers to new allocations only. It does not include small sites allowance or slippage allowance.

\* For main towns - % of Houses Allocated to each new settlement determined against the total number of new allocations for towns

\* For larger villages - % of Houses Allocated to each new settlement determined against the total number of new allocations for larger villages

5.5 The table above shows that Blythe Bridge and Forsbrook is the only settlement which can provide local amenities across each of the categories considered desirable to support sustainable development for day to day living. Most importantly, Blythe Bridge and Forsbrook is the only settlement in Staffordshire Moorlands District with a railway station providing services on the Crewe-Stoke-Derby line. Stoke can be accessed by train within just 12 minutes, on an hourly service from Blythe Bridge and provides local residents with access to a wide range of job opportunities and retail outlets, and Manchester is just over an hour away with a single interchange.

5.6 One of the core principles of the NPPF at paragraph 17 is to

**'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'.**

- 5.7 Looking at the services and facilities at Blythe Bridge and Forsbrook compared to those in the main towns and larger villages, there appears to be an anomaly between the availability of local amenities and the amount of houses allocated to Blythe Bridge and Forsbrook that would be consistent with SMDC seeking to 'actively manage' growth in accordance with the Framework at paragraph 17.
- 5.8 The amenity offer in Blythe Bridge and Forsbrook is greater than all of the main towns by reason of its railway station. The railway station sets Blythe Bridge apart from any other settlement by providing a sustainable transport option that is within cycling distance of the St Modwen site, or can be accessed by local buses. Bus services run between the Blythe Bridge Railway Station and the Uttoxeter Road (0.4miles from the A50 roundabout adjacent to the northern part of the site) every 20 minutes Monday to Saturday during peak hours (6am – 6pm). Blythe Bridge Railway Station provides hourly services further afield to Manchester, Crewe and Derby via Stoke on Trent between 7am and 9pm. The NPPF, at para 30 is clear in its support for the location of planned development to facilitate the use of sustainable modes of transport.
- 'In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.'**
- 5.9 Notwithstanding the railway station, the range of services and facilities in Blythe Bridge and Forsbrook are entirely comparable to the main towns, yet all towns have been allocated substantially higher proportions of housing than is being offered to Blythe Bridge and Forsbrook. New allocations total 699 dwellings in Leek; 808 dwellings in Cheadle; and 512 dwellings in Biddulph. As a proportion of total new allocations this is 34.6% to Leek, 25.4% to Biddulph and 40% to Cheadle.
- 5.10 Only 120 dwellings, equating to a 15.2% proportion of all new allocations across the larger villages have been allocated to Blythe Bridge and Forsbrook. We consider Blythe Bridge and Forsbrook should be positioned higher within the settlement hierarchy. Whilst we do not advocate Blythe Bridge and Forsbrook being a main town, there is a role we consider for the more sustainable Larger Villages (e.g. Blythe Bridge and Forsbrook, and Werrington) to be distinct from other village within the Rural Area. These more sustainable large villages should receive a higher proportion of the Rural Area's growth, relieving the pressure on windfall sites and Green Belt releases in other Villages too.
- 5.11 Blythe Bridge and Forsbrook offers a far better range of services and facilities compared to any other Larger Village, however the number of houses allocated in Cheddleton is higher and the number of houses allocated in Werrington is only marginally fewer.



- 5.12 As a settlement providing the greatest scope of facilities and services, it is of concern that that Blythe Bridge and Forsbrook is not afforded a higher proportion of the proposed housing, more comparable with the main towns. We consider that the scale of development proposed to Blythe Bridge should be reassessed to better reflect the sustainability credentials of the settlement.
- 5.13 The suitability of Blythe Bridge and Forsbrook settlement to receive additional housing is further supported by the aforementioned Halcrow Study (DCS) (2011). The DCS provides evidence on the suitability of the 3 market towns and 12 Large Villages (including Blythe Bridge and Forsbrook) to receive additional housing. The Study provides information regarding the suitability of settlements in terms of their social infrastructure, physical infrastructure and accessibility.
- 5.14 The Study uses a 'traffic light system' to record the suitability of each settlement with 'green' being the most positive, and red being the least. In this Study, Blythe Bridge and Forsbrook and Leek were the only settlements that rated 'green' in all categories. The Study noted that Blythe Bridge and Forsbrook ranked highest, with 4 other settlements in terms of its sustainability rating. In respect of social infrastructure, only Blythe Bridge and Forsbrook and Cheddleton gained a 'green' sustainability rating meaning that social infrastructure is not expected to act as a constraint on future expansion of this settlement. In terms of physical infrastructure capacity, Blythe Bridge and Forsbrook scored the highest, along with the town of Leek. The Study concluded this to mean that Blythe Bridge and Forsbrook was a settlement where adequate high capacity utility infrastructure is in the near vicinity and where a reasonable level of investment is foreseen. Blythe Bridge and Forsbrook was considered within the Study to have excellent network accessibility and road accessibility being close to the District's 'A' roads. It gained an overall score of 87 out of 100. This Study further substantiates the sustainability of Blythe Bridge and Forsbrook as a location for growth.
- 5.15 Given the suitability of Blythe Bridge and Forsbrook for accommodating growth, St Modwen propose that this settlement, and potentially Werrington - which also offers a good range of services and facilities, be re-categorised as a higher order Rural Area settlement within the next stage of the Local Plan. The Rural Area housing requirement could then be reapportioned, (whether our case for increased growth equivalent to 440 dwellings per annum is accepted or not) to ensure the more sustainable Rural Area settlements accommodate a greater proportion of the Districts growth compared to other less sustainable rural settlements. Having regard to the spatial distribution of growth set out in the Staffordshire Moorlands Preferred Options Consultation Booklet, it is proposed that Blythe Bridge and Forsbrook and potentially Werrington would be positioned higher

than other 'Larger Villages' within the Rural Area given the sustainability credentials of the settlements. Alternatively, these settlements could receive a greater share of the distributed growth to the Rural Areas.

### **Strategic Housing Land Availability Assessment (SHLAA)**

- 5.16 The Council's Strategic Housing Land Availability Assessment (SHLAA) July 2015 identifies the land that has been assessed as part of the Council's considerations of suitable housing land. In the case of Blythe Bridge and Forsbrook, the Council did not reassess the St Modwen site when preparing it in July 2015 even though the site is within the Blythe Bridge and Forsbrook settlement boundary, and the St Modwen site (and the residual adjoining land south of the A50) is the only site that is not within the Green Belt.
- 5.17 The SHLAA was prepared two months prior to the Issues and Options Consultation for the Local Plan in September 2015, to which St Modwen subsequently responded. At that time, St Modwen maintained the support for the allocation of the Blythe Vale site for employment use. This was important in terms of establishing St Modwen's clear desire to develop their land and ensuring that the Council were aware of this option.
- 5.18 In preparation for this stage of consultation, and having reviewed and reflected on the evidence base, St Modwen consider that the delivery of the Blythe Vale site is most achievable in circumstances where the development is of a mixed use, as opposed to the restricted use class that the RIS allocation supports, and one that is further constrained by restrictive planning conditions pursuant to an extant planning permission.
- 5.19 Given that the SHLAA was prepared prior to St Modwen's representations in 2015, St Modwen's view is that the site should have been assessed within the SHLAA. The SHLAA methodology at paragraph 2.3 supports this view and states that potential sources of supply should include

**'land allocated in plans for employment and other uses' and 'unimplemented /outstanding planning permissions'.**

The NLP 2014 Employment Land Review in reporting on the availability of land, states the following at paragraph 4.25:

**"Data collated by SMDC suggests that there is currently around 17.13ha of 'available' B-class employment land across Staffordshire Moorlands. It should be noted that this supply does not include the Regional Investment Site (RIS) at Blythe Bridge. This site was allocated in the Staffordshire Moorlands Local Plan under Policy E2 since it was identified as a special-case 'Premium Employment Site' in the Structure Plan to serve the aspirational needs of the North Staffordshire Sub-Region. It was retained in**

**the RSS Revision (but rebadged as 'RIS'). It was subsequently granted outline planning permission in 1997 (recently renewed). To date there is only reserved matters approval pertaining to a single 1.44ha 'plot' of the wider site (uncommenced). Although it is a commitment of 50 hectares it does not count against the Core Strategy requirements, because it is considered to be a strategic provision for North Staffordshire rather than being specific to the Staffordshire Moorlands."**

- 5.20 The NLP Report suggests that investment is needed (paragraph 4.26) to improve the quality of key employment sites. Investment of course will be possible where a scheme is viable and deliverable and it is through making representations to the Local Plan that St Modwen seek to achieve this for Blythe Vale.
- 5.21 Using the Council's methodology set out in the SHLAA, we have prepared a comparative assessment of the St. Modwen site to supplement those sites already assessed in the SHLAA by SMDC.
- 5.22 The Council's judgement regarding deliverability is based on the degree of availability, suitability or achievability. The sites were categorised in order of their deliverability potential in accordance with the criteria below:
- Classification A - If the site was considered deliverable in the short term
  - Classification B – If the site was considered developable in the medium/longer term
  - Classification C – If the site was considered to have no or limited potential

### **Blythe Vale Assessment**

#### *Availability*

- 5.23 In terms of availability St. Modwen can bring forward the site for residential use within 5 years. They have appointed a full technical team to inform the promotion of the site and preparation of a planning application. St. Modwen are experienced developers of mixed use sites and would initially seek to secure a viable outline planning permission for the mixed use development of this site. St Modwen would typically then seek to deliver a serviced site for development. From a housebuilder perspective, St. Modwen Homes may also consider developing part of this site.
- 5.24 Having regard to the criteria in the SHLAA, relating to availability, as discussed above, the site is considered to be available now and would be classified as 'A'.

#### *Suitability*

- 5.25 In terms of suitability the site is allocated at Policy SS8 of the adopted Core Strategy for B1 and B2 uses, where appropriate. The site is located outside of the Green Belt adjacent

to the urban area of a large village, which offers a wide range of facilities and services. For these reasons it is considered that development of the site would constitute a natural extension of the village and is within the village boundary. Blythe Bridge and Forsbrook has the advantage of a railway station which provides the opportunity for sustainable travel. The site also benefits from its accessibility to strategic road network. Technical work has also been carried out to support previous planning applications at the site and inform viability work. This technical evidence demonstrates that there are no known physical or environmental constraints to the delivery of development on the site for a mixed use scheme. There is also an approved access into the site permitted under 01/00125 application 3<sup>rd</sup> April 2007 (extended in 2011).

- 5.26 Having regard to the criteria in the SHLAA relating to suitability and explored above, the site is considered to be wholly appropriate for residential use and would be classified as 'A' using the Council's scoring system.

#### *Achievability*

- 5.27 The Council's assessment of achievability is informed by work undertaken by Halcrow for the Development Capacity Study Report 2011, which in part assesses the viability of different types of site in each of the towns and larger villages. Development in Blythe Bridge and Forsbrook on both brownfield and greenfield sites was considered economically viable taking into account all likely costs and planning obligations associated with the site. The St. Modwen site constitutes a greenfield site within the village boundary of Blythe Bridge and Forsbrook. The technical evidence relating to the site demonstrates that there are no known physical or environmental constraints which would impact on the viability of a mixed use scheme.
- 5.28 Having regard to the criteria in the SHLAA, explored above relating to achievability the site is considered to be viable and achievable and would be classified as scoring 'A' using the Council's criteria.
- 5.29 The Council use the following matrix in their SHLAA to help classify each site based on an assessment of availability, suitability and achievability.

Classification		Availability	Suitably	Achievability
A	<b>Deliverable Sites</b> (1-5 years)	1	1	1 or 2
B	<b>Developable Sites</b> (6 – 15 years)	1 or 2	2	1 or 2

C	<b>Undeliverable Sites</b> No or limited potential.	3	3	3
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- 5.30 Using the matrix above, the St. Modwen site is considered deliverable (classification A). This is because the site is available now (score 1); is suitably located adjacent to residential development with a wide range of services and facilities in the village (score 1); and there is reasonable potential for housing to be delivered on the site within five years (score 1).
- 5.31 The assessment clearly demonstrates the deliverability of the St Modwen site and suitability for allocation in the Local Plan.
- 5.32 By way of comparison with other larger sites assessed by SMDC in Blythe Bridge, and Forsbrook none of these were found to be deliverable in the short term (1-5 years) (classification A).

#### The Local Plan Preferred Housing Sites and their SHLAA Scoring

- 5.33 Two sites in Blythe Bridge and Forsbrook have been identified as preferred housing allocations (reference numbers BB041 and BB054) in the Staffordshire Moorlands Local Plan: Preferred Options Sites and Boundaries consultation booklet. These sites were included in the Council's SHLAA and assessed for their deliverability.
- 5.34 Site BB054, Land south west of Draycott Road (2.9 ha with capacity for 70 dwellings) was considered **developable** within 6 – 15 years (classification B in accordance with the matrix above). The site's main weakness when assessed by the Council was identified as its designation within the Green Belt.
- 5.35 However site BB041, Land south west of Caverswall Road (31.25 ha with capacity for 50 dwellings) was considered **undeliverable** (classification c of matrix above) with limited potential for residential development. In terms of the site's suitability the SHLAA states that "although a logical extension to settlement, would impact significantly on landscape setting of this part of settlement". The Local Plan does not justify why this particular site is now allocated for development when it appears to be contrary to the findings of the SHLAA.
- 5.36 We have concerns that both sites are located within the Green Belt and that "once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation of or review of the Local Plan" (paragraph 83 of the NPPF). Whilst we accept that the Local Plan is under review, it is the absence of justified

exceptional circumstances that we seek clarification on. By comparison, the Blythe Vale site is deliverable, based on our SHLAA exercise undertaken above, and we support the allocation of this site for a mixed use scheme that includes residential development, to reduce the reliance on additional land being released from the Green Belt.

- 5.37 With the absence of exceptional circumstances to justify changes to the established Green Belt boundary around Blythe Bridge and Forsbrook we do not consider that there can be any certainty attached to the allocated sites being deliverable given that these sites may not be favoured at Examination. We explore the Green Belt Review later in this section.
- 5.38 The Blythe Vale site is not constrained by the Green Belt which provides more certainty in respect of availability within the next five years. It has the scope to provide housing as part of a mixed use scheme and our assessment of the site, using the Council's SHLAA methodology demonstrates its deliverability.

#### **Green Belt Review 2015**

- 5.39 The Staffordshire Moorlands Green Belt Review Study 2015 identifies potential sites for release from the Green Belt. The Staffordshire Moorlands Local Plan: Preferred Option Sites and Boundaries identifies two preferred housing allocations, which have been appraised as part of the Study in the village of Blythe Bridge and Forsbrook.
- 5.40 The 2015 Study advises that the development of site BB054 would have a limited overall impact on Green Belt purposes. The Study recommends that the site should be considered for release 'only in the context of wider land in this location'. Most importantly, it also recommends that the site should be released 'under exceptional circumstances only'. The Local Plan demonstrates neither exceptional circumstances, nor this release being within the context of 'wider land'.
- 5.41 It was considered that development of the site at 'Land south of Caverswall Old Road' (ref BB041 in the Local Plan consultation booklet) would have a moderate overall impact on Green Belt purposes.
- 5.42 The Blythe Vale site is located outside of the Green Belt and offers the potential to deliver residential development as part of a mixed use scheme, and as such can be set apart from these two potential allocations.
- 5.43 The Blythe Vale site is available for development within 5 years, is suitably located and is deliverable without altering Green Belt boundaries.

### **Environmental and Technical Matters**

- 5.44 The environmental and technical issues associated with the Blythe Vale RIS have been previously assessed on a number of occasions, including when the RIS was originally allocated in the adopted Local Plan for employment use in 1998, following the grant of outline planning permission in 1997 (extended in 2011). Whilst the decision making process behind the original allocation and planning permission(s) confirms that there are no over-riding physical or environmental constraints to the development of the site for employment use, these can be equally applied to development of the site for residential use.

### **Listed Buildings**

- 5.45 Two Listed Buildings are located within 1km of the site. One lies just to the north of the site (Stonehouse Cottage; SMR 6248) and the other is in the Village of Forsbrook (Forsbrook Hall Farmhouse; SMR 6246). Due to the relationship to and distance between the Listed Buildings and the site, it is not considered that the settings of these Listed Buildings would be adversely affected by residential development on the site. The site is also not located with a Conservation Area.

### **Archaeology**

- 5.46 Staffordshire County Council have published a Historic Environment Assessment (HEA) for Staffordshire Moorlands (August 2010). The Assessment included detailed analysis of the potential for archaeological remains across the District including the St. Modwen site. In terms of the site, the results conclude that there is moderate to low potential for unknown archaeological sites to survive.
- 5.47 The Sites and Monuments Records held by Staffordshire County Council identify archaeological and historic sites. The site does not contain any known archaeological sites registered with the Sites and Monuments Record within 1km of the site. A number of 'find spots' have been noted in the vicinity that are identified within the County Council Historic Environment Assessment (2010) and would be explored by a Desk Based Assessment as part of preparing a planning application. The Site lies on the edge of an area of modern housing, however no archaeological remains are known from its construction, and in view of the sparse density of known sites in the vicinity it is considered unlikely that further sites exist.

### **Ecology**

- 5.48 There are no statutory or non-statutory designated sites, UK or Local Biodiversity Action Plan Priority Habitats or Ancient Woodlands within 2km of the site. One non-statutory designated site (Blythe Bridge Woods Biological Alert Site) is located approximately 1km

north-west of the site boundary. Taking into consideration the location of this site and the nature of the proposals, it is considered that there will be no effects on this site from any future application.

- 5.49 FPCR Environment and Design Ltd were commissioned by St. Modwen Developments Ltd in September 2015 to investigate ecological matters and produce a number of surveys relating to bats, reptiles and Great Crested Newts. The survey work concludes that hedgerows and ponds are the most valuable habitats within the site. Where feasible these habitats will be retained, where removal is necessary, mitigation will be provided.
- 5.50 The survey work also demonstrates that the key species to accommodate within the masterplan is a small population of great crested newts that are present within two ponds at the eastern end of the site. This constraint will be considered as part of the masterplanning process, and given the extent of land controlled by St Modwen, the impacts of development on this species and its habitat can be fully mitigated for ensuring that the favourable conservation status of the species can be maintained. Both residential and employment related development include significant opportunities for green infrastructure and habitat creation that can be used as part of this mitigation.

### **Contamination**

- 5.51 There is no evidence of ground contamination on the site. A detailed review of the available historical Ordnance Survey maps was undertaken within the Phase 1 Geo-Environmental Audit by Halcrow Group Limited in May 2003 and informed subsequent planning permissions. In summary, no potentially contaminative former uses of the site have been identified.

### **Highways**

- 5.52 The provision of access to Phase 1 of the employment site, from the A521 was approved by Reserved Matters approval 01/00125/REM on 3<sup>rd</sup> April 2007. This Reserved Matters Submission was accompanied by a Travel Plan (developed in consultation with Highways Agency (now Highways England) and County Council Highways) which was agreed in January 2005. It is however noted that Condition 1 was varied by the extension of time planning permission 11/00405/REM dated 9<sup>th</sup> August 2011.
- 5.53 Planning permission reference 11/00405/REM1\_MJ granted 9<sup>th</sup> August 2011 extends the time limit for the submission of reserved matters to 15<sup>th</sup> July 2018 and the implementation of the permission to 15<sup>th</sup> July 2021. Condition 2 requires any application for reserved matters approval to be made not later than 15 July 2018 and the development to which permission relates to begin no later than 15<sup>th</sup> July 2021.



- 5.54 The approved access scheme provides for the wider RIS and accommodates a volume of traffic that enables the land south of the A50 to utilise this junction. The allocated land to the south of the A50 is otherwise landlocked.

### **Landscape**

- 5.55 Staffordshire County Council published a Landscape and Settlement Character Assessment (LSCA) in 2008, which covers the settlement of Blythe Bridge and Forsbrook. In this document, the LCA map identifies the St Modwen site as being an *'important landscape contributing to the setting of Blythe Bridge'*. Other key points from the LSCA are that:
- Blythe Bridge and Forsbrook lies within the Settled Plateau Farmland Slopes landscape character area;
  - Blythe Bridge's original settlement lies along a Roman road (Uttoxeter Road); and
  - The A50 Stoke-Derby link bypassed the village to the south in the late 20th Century creating a strong development boundary.
- 5.56 In terms of the Priority Habitat Inventory dataset, the north west of the site has been identified as 'deciduous woodland' in character, however there are no protected trees within the site.
- 5.57 Having regard to the extant outline planning permission which establishes the principle of development at the site, a new Landscape Visual Assessment would be prepared in support of any forthcoming application. This will inform the layout of the proposed development, and the design of green infrastructure within a high quality landscape scheme. The scheme would complement and maintain unification with the surrounding context of semi-natural landscape and local character.
- 5.58 St Modwen have owned the Blythe Vale site in excess of 20 years and have built up a detailed knowledge and understanding of technical constraints and how these might be managed or mitigated. St Modwen's technical team are in the process of updating survey data to inform the promotion of this site through the Local Plan and in support of a planning application for mixed use development.
- 5.58 We are currently giving consideration to refreshing previous evidence relating to noise, utilities and services, and drainage. This information will be fed into future representations to the Local Plan.

## 6.0 DELIVERABILITY

- 6.1 The St Modwen Land benefits from
- An existing Core Strategy Allocation for employment development (RIS)
  - An emerging plan allocation as a Northern Gateway Opportunity site
  - An extant planning permission for employment development that planning conditions allow to be implemented in the period to 2021
- 6.2 Through both existing and emerging allocations, and through the grant of planning permission and subsequent extension of time permissions, the District Council has accepted and supported the principle of Blythe Vale being developed, including the St Modwen land. We must now consider what mechanisms can be put in place to assist in the delivery of this site given the level of investment by all parties to date.
- 6.3 The site is well located to form a gateway, however this need not be a 'Gateway Opportunity' that is solely restricted to one form of development. Gateway developments are successful for a number reasons, related to the scale and form of development; the design, the layout of buildings and how they relate to one another and the spaces around them. Mixed use development can create 'gateways' if designed and delivered to a high quality.
- 6.4 The site is easily accessible by public transport, private car, cycling and on foot, and the proposed development of the St Modwen land can provide links to the existing built form within Blythe Bridge and Forsbrook, and benefit from existing services and facilities within walking and cycling distance of the site.
- 6.5 There are no physical obstacles in terms of the provision of the necessary infrastructure to deliver a mixed use development at Blythe Vale. There is an approved access into the site and it benefits from very close proximity to the Strategic Road Network (SRN).
- 6.6 Section 5.0 identifies that the environmental and technical issues associated with the site have been previously assessed including Landscape Effects, Heritage, Archaeology, Ecology, Soils and Geology, and Highways. The assessments confirm that there are no physical or environmental constraints to the development of the site for a mix of uses.
- 6.7 A mixed use scheme comprising employment, residential and leisure/local centre uses would enable a viable scheme to be delivered on a site previously excluded from the Green Belt where the principle of development has already been accepted. St Modwen

have explored other means of bringing the site forward (i.e. the recent application for Growth Funding towards the access works necessary to unlock the site) however, the most realistic prospects of achieving this will be through the mixed use development of the site.

- 6.8 St Modwen own land north of the A50 and have the ability to provide access to this and the wider RIS site. The St Modwen land is solely within their control, and is therefore available immediately to deliver homes at an early stage within the plan period. SMDC can take confidence in this. Meetings with officers to date have demonstrated St Modwen's willingness to work constructively with the Council, Members and the local community to secure the delivery of this site.

**APPENDIX 1**  
**SITE PLAN**





**APPENDIX 2**  
**JLL EMPLOYMENT PAPER**







St Modwen Developments Limited

Staffordshire Moorlands Preferred Options Sites and Boundaries

Blythe Vale Business Park - Employment Land Issues and Market Signals

## 1 Scope

- 1.1 This brief paper considers relevant employment land issues and market signals that concern the future procurement and delivery of Blythe Vale Business Park (the Site), which is referred to in the Preferred Options as the Northern Gateway Opportunity Site. Previously, it has been referred to as the Blythe Bridge Regional Investment Site (RIS) and, before that, as a Premium Employment Site.
- 1.2 NPPF recognises and emphasises the importance of using up to date market signals, particularly in terms of plan-making (Paragraph 17, 22 and 158). In addition, due reference is made to market factors in PPG, particularly with reference to the three principal tests of allocating development land - suitability, availability and achievability.

## 2 Credentials

- 2.1 St Modwen Developments Limited (SMDL) is one of the foremost developers of industrial, commercial and mixed use property in the Midlands. Successful employment led developments and current projects in the sub-region include:-
  - Trentham Lakes.
  - Etruria Valley.
  - Meaford Business Park (formerly Meaford Power Station).
  - Burton Gateway.
- 2.2 JLL is the biggest commercial property agent serving the UK, with offices throughout the UK, including Birmingham, Manchester and Nottingham. It is a multi-disciplinary practice, but is particularly well known for its expertise and experience with industrial, distribution and office property. It produces a bi-annual research report entitled UK Big Box Industrial and Logistics Market. It also produces an annual report on the availability of industrial floor space throughout the UK.
- 2.3 JLL is an active agent in Staffordshire in terms of employment property and land. Current instructions include:-
  - Prologis Park, Sideway, Stoke-on-Trent.
  - G Park, Stoke-on-Trent.

- Redhill Business Park, Stafford.
- Quintus, Branston Locks, Burton-upon-Trent.
- Kingswood Lakeside, Cannock.

2.4 The author of this report has also advised a number of public sector bodies in respect of the market for employment land in Staffordshire. These include:-

- AWM - Stage 1 Regional Logistics Study, 2014.
- Lichfield District Council - A Market Assessment of the General Employment, Existing Estates and Land Allocations, 2008.
- Cannock Chase Council - Employment Land Studies, Stages 1 and 2, 2009, and Offices Study Update, 2012.
- Staffordshire County Council - Study into Existing Land and Property Markets of Staffordshire, 2010, and Market Feasibility Study for Redhill Business Park, 2011.

2.5 The author was also involved in the collation of market data and evidence to support the findings of the West Midlands Strategic Employment Site Study (WMSESS), produced jointly by Peter Brett Associates and JLL on behalf of the West Midlands Local Authority Chief Executives and published in September 2015. Reference to this influential report is made below.

### 3 Principal Observations

3.1 JLL's principal observations about the Site, in market and employment land terms, are:-

- The Site is strategic, relative to other sites in the District, and has the potential to attract footloose companies from the wider sub-region and region.
- The Site has not come forward for development. This is due to its very restricted permitted and allocated use (i.e. just B1 and B2), as confirmed and reinforced by the Development Brief, and high infrastructure costs.
- The case for restricted use is no longer compelling and, increasingly, a more flexible approach is being taken with RISs and other strategic employment land in the region.
- The Site has a role to play in terms of accommodating and attracting local employment requirements and recognition of this will assist delivery of the development (particularly in the first phases).
- Phase 1 of the Site's development has particularly high infrastructure costs, associated with its access, and requires a mix of development, including housing, to enable its successful delivery.
- Phase 2, taking in the rump of the Site on land to the south of the A50, requires the successful delivery of Phase 1 in order to come forward for development.

3.2 The following sections expand on these observations.

#### 4 A More Flexible Approach to Strategic Employment Sites, Including RISs

- 4.1 The concept of RISs was promoted by the West Midlands Regional Spatial Strategy (and the Regional Planning Guidance before that) and is over 25 years old. RISs were intended to be multi-occupied sites of 25-50 hectares, to support the delivery of Regeneration Zones and High Technology Corridors, and to attract high quality occupiers who are nationally or internationally footloose. They were principally restricted to Class B1 and B2 (where appropriate).
- 4.2 In recent years, a number of RISs have been relatively successful in attracting B1/B2 occupiers. i54 and the Advanced Manufacturing Hub, Aston, has been particularly successful in this regard. The PBA/JLL West Midlands Strategic Employment Site Study (WMSESS) notes that the RISs serving the metropolitan area of Birmingham have been successful, with high occupancy. However, RISs away from the conurbation, such as Chatterley Valley and the Site, have fared less well.
- 4.3 With regard to use, the WMSESS considers that manufacturing and distribution have merged into one market and the distinction between B1c/B2 and B8 is now not always possible to make. Essentially, this study concludes that the market is increasingly blurring the distinction between the two. It adds that it is very difficult to restrict operators to specific uses and that occupier restrictions generally reduce values and discourage development.
- 4.4 The Study into Existing Land and Property Markets in Staffordshire, produced by King Sturge (now JLL) for Staffordshire Council in May 2010 to inform its then evolving Local Economic Assessment, does refer specifically to the issue of restricted uses on strategic employment land. In its Principal Findings, this report states (in Paragraph 9.7);

*"The importance of unrestricted planning permissions on industrial and distribution sites cannot be over emphasised. Sites where there are restrictions in terms of planning, particularly against large B8, have generally led to developments that have not attracted occupiers. This is particularly pertinent to the Major and Regional Investment Sites, where take up has either been slow or non-existent....An unrestricted planning permission is not just important to attract occupiers, but is critical in terms of funding and exit strategies. The context behind restricting such sites should be reviewed."*

- 4.5 The impact of restrictions on funding streams and exit strategies is just as relevant today. This is particularly important for seedcorn or smaller scale developments, that which will often kickstart developments, and are typically funded on a speculative basis. Financial institutions will not back projects unless the market for occupiers is totally unrestricted (i.e. with B1, B2 and B8 consent in place).
- 4.6 More latterly, certain local planning authorities have shown a more flexible approach to incorporating B8, and other uses, to promote RISs and other strategic employment land sites. For example, Birmingham City Council has taken a more flexible approach in terms of use with the allocation of Peddimore. This site was promoted originally in the Regional Spatial Strategy as a Major Investment Site (where similar use restrictions (i.e. just B1 and B2) applied), but was not allocated by the 2005 adopted UDP. It is now proposed to be allocated in the Birmingham Development Plan, with its allocation sanctioned by an inspector, despite being in the Green Belt. This allocation permits a significant element of B8 (31 hectares out of a total of 71 hectares).
- 4.7 A similar approach has been taken by South Staffordshire District Council with the ROF Featherstone site. This historic allocation of 14 hectares has been restricted to B1 and B2 uses and has not been developed.

However, to assist its delivery (the site is also constrained in terms of access and contamination) the allocated use of the site is now being broadened to include B8 uses.

- 4.8 Solihull MBC has taken a different approach with Blythe Valley Business Park. The first two stages of this scheme have been partially developed for an HQ office/business park. However, with the last phase, Solihull MBC has decided to allocate it for housing. With Chatterley Valley, the only successful part of the development has been the construction of Blue Planet. This 380,000 sq ft industrial unit has the benefit of a B1, B2 and B8 user and has now been occupied by JCB as a warehouse.
- 4.9 It is to be noted that at the recommendation of the Panel to the West Midlands Regional Spatial Strategy, the uses within RISs were qualified. Ancillary development including hotels, health and fitness, leisure facilities, childcare provision, local shopping facilities, restaurants and banking facilities, were all considered to be acceptable, provided that they primarily serve the occupiers of the RIS.
- 4.10 All this suggests strongly that a more flexible approach is both appropriate and necessary in order for the Site to come forward for employment led development. Specifically, there is a pressing need to widen the use to include B8 as well as B1 and B2. Without this first step, the chances are that the Site will remain undeveloped.

## 5 Local Employment Land Requirements

- 5.1 JLL considers that the Site has clear strategic qualities. It has almost direct access to the A50 - a key east- west route across the Midlands, is large enough to accommodate sizeable requirements for both industry and warehousing, and has profile being on the edge of the Stoke-on-Trent conurbation. These qualities will be attractive to footloose companies.
- 5.2 The WMSESS noted that whilst RISs were intended to support diversification and modernisation of the West Midlands economy, it was particularly apparent that locally based operators had located at RISs. Similarly, JLL considers that part of the site, particularly the first phase, has a potential role to play in accommodating and attracting more local requirements. This is for both quantitative and qualitative reasons.
- 5.3 Table 3.3 in the Preferred Options summarises residual employment land requirements, once account has been taken of completions and commitments for employment developments. An amended version of this table (with columns added by JLL showing the gross requirement for each area and the total maximum allocations) is provided below:-

**Table 3 - Amended Version of Table 3.3 to the Preferred Options**

Area	Percentage Split	Gross Requirement (hectares)	Residual Requirement (hectares)	Gross Maximum Allocations (hectares)
Leek	30	10.5	8.02	14.23
Biddulph	20	7	1.95	10.24
Cheadle	20	7	3.12	7.59
Rural	30	10.5	6.37	8.58
<b>Total</b>	<b>100</b>	<b>35</b>	<b>19.46</b>	<b>40.64</b>

5.4 The gross allocations have been referenced from the maps and schedules in Section 4 of the Preferred Options. These are tabled below in Table 4:

Table 4 - Summary of Allocated Employment Sites

Area	Allocation	Site Area (hectares)	Comments (if relevant)
Leek	Broad Area EM2 (Leekbrook)	7.66	
	LE150 (Newton House)	3.25	35% of mixed use site area
	LE235 (Cornhill)	1.65	50% of mixed use site area
	ADD09 (Leekbrook)	1.67	Maximum amount
<b>Sub Total</b>		<b>14.23</b>	
Biddulph	BD117	6.74	Housing/employment mixed use
	BD076/076A	3.5	Employment/retail
<b>Sub Total</b>		<b>10.24</b>	
Cheadle	Broad Area EM1	4.27	
	Broad Area EM2	3.32	
<b>Sub Total</b>		<b>7.59</b>	
Rural	OCO55 (Cresswell)	8.58	

5.5 Unfortunately, it is not clear how the Gross Requirement has been adjusted to realise the Residual Requirement. We can find no published data on completions (from 2011 to 2015) and commitments (as at 1 April 2015). As such, it is difficult to know if any of the allocations include either of these elements (i.e. to establish if there has been any double-counting).

5.6 The Employment Land Review by Nathaniel Lichfield & Partners (NLP) (July 2014) refers to 17.13 hectares of “available” B class employment land. This is reasonably close to the 15.54 hectares, which is the difference between the Gross Requirement of 35 hectares and the net Residual Requirement of 19.46 hectares. However, we do not have a specific breakdown of completions and commitments (usually defined as planning permissions) so do not know what, if any, overlap exists. In addition, some of the allocations form part of mixed use proposals. It is unclear if the gross or net areas are provided.

5.7 Nevertheless, it is clear that one category seems short in terms of supply, or at least vulnerable in terms of delivery. This is Rural. Only one site in the Rural Area is allocated – land to the east of Blythe Business Park at Cresswell. This absorbs the whole requirement for Rural employment land.

5.8 This site is located reasonably close to the Site. However, access to the A50 is not particularly good, being accessed by a relatively minor road. In addition, the site was referred to by the Inspector in his report of 2 January 2014 concerning the Core Strategy. The inspector was concerned:

*“There is no evidence before this Examination to indicate that account has been taken of the proximity and potential impact on the neighbouring settlement of Cresswell, or that questions regarding the*

*possibility of contamination by industrial waste have been answered satisfactorily as part of the process of determining whether the principle of expansion is feasible or desirable".*

5.9 This site has not been marketed and it is not clear how deliverable it is. If there are question marks about its suitability, availability and achievability then the Site provides an obvious alternative in accommodating the requirements for rural employment, particularly B8 uses given that it has access to the A50. To this end, the Staffordshire Moorlands Employment Land Study (September 2008) made the connection between there being no B8 land in Staffordshire Moorlands, due to its location and difficulties associated with reaching the Strategic Road Network, and Blythe Vale Business Park being the only site with direct access to the A50 and the Strategic Road Network.

5.10 The more recent NLP Employment Land Review Study also contains a couple of qualitative references concerning land supply. In the SWOT analysis (Table 6.4) it notes that one of the weaknesses for Staffordshire Moorlands is:

*"Employment sites are almost at full capacity. There is an identified lack of good quality modern premises and smaller sized units available for immediate take up and a significant under representation of high quality office locations."*

5.11 In addition, in Paragraph 7.97, under the heading "Commercial Perspective", it states that:

*"It was suggested by stakeholders that there remains an issue regarding the lack of good quality industrial land."*

5.13 Overall, we consider that the Site is well placed to accommodate and attract local requirements as well as strategic requirements. Moreover, we see both local and regional markets as complementary, rather than being mutually exclusive.

## **6 Delivery**

6.1 Despite having the benefit of a longstanding allocation and consent, and marketing over a long period, the Site has not come forward for development. Partly this is because of the restrictions in terms of use, as described previously. However, delivery of the Site has also been obstructed by the infrastructure required to service Phase 1 and the reliance Phase 2 places on the successful development of Phase 1.

6.2 Phase 2 takes in land to the south of the A50 and forms the largest part of the Site. This part of the Site forms the most obvious location for any large inward investor. However, Phase 2 is effectively landlocked as JLL understands no direct access from the A50 is likely to be permitted. As such, the Development Brief requires a crossing by a bridge (or bridges if both are single carriageway) from the Phase 1 land in order to access the Phase 2 land.

6.3 The Phase 1 land can be accessed from the A521. However, the technical solution to create a robust access is expensive.

6.4 Despite a significant improvement in market conditions, the funding of industrial and office development remains challenging. This is evidenced by the relatively few speculative developments undertaken within the region since the Great Recession of 2009 to 2012.

6.5 Essentially, without external funding, the development of the first phase for just B class uses is unlikely to be viable. Instead, other more valuable uses, such as residential, a local centre and leisure (e.g. a

pub/restaurant), are required in order to enable the traditional employment elements (i.e. B class) of the scheme.

- 6.6 The mix of uses needed to fund the infrastructure requirements of the overall development of the first phase is something SMDL is currently reviewing. However, it should be noted that a local centre and leisure uses, whilst not traditional B class employment uses, will generate new jobs and economic development.

PJL

JLL

7 June 2016