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**From:** [REDACTED]  
**Sent:** 08 September 2017 15:10  
**To:** Blackcountrycorestra  
**Cc:** [REDACTED]  
**Subject:** Black Country Core Strategy Review Issues and Options  
**Attachments:** JLL response to Black Country Core Strategy I&O Q4.docx; JLL response to Black Country Core Strategy I&O Q5.docx; JLL response to Black Country Core Strategy I&O Q11a.docx; JLL response to Black Country Core Strategy I&O Q16-19.docx

Dear sir/madam

Please find attached representations we are making on behalf of Nurton Developments (Hilton) Ltd in respect of Questions 4, 5, 11a and 16-19.

Please do not hesitate to contact me if you have any queries.

I trust these representations are helpful in formulating the next iteration of the draft Core Strategy.

Regards

[REDACTED]  
[REDACTED]  
Director - Planning & Development  
JLL  
45 Church Street | Birmingham B3 2RT

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**Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.**

<b>Key Issue 3 – Supporting a resurgent economy – Question 4</b>
<b>Do you agree or disagree with the approach set out in the relevant section and / or question?</b>
Disagree – we do not consider the employment land requirement identified is appropriate.
<b>Comments (continue on a separate sheet if necessary)</b>
<p>The EDNA is a well-researched and presented study. However, we are concerned that the overall employment land requirement identified by it (800 hectares) and the subsequently identified gap between anticipated need and supply (300 hectares) has been underestimated significantly. Unless this is corrected, it will be difficult to plan properly for the right quantity and quality of new employment land and this, in turn, will seriously hinder the economic revival of the sub-region.</p> <p>We consider that the overall employment requirement (800 hectares) is a significant underestimation for the following reasons: -</p> <ul style="list-style-type: none"> <li>• The EDNA assess three methodologies for estimating future land requirements but ultimately only relies on two (employment growth and past development trends), discounting inexplicably the third method (GVA based growth in manufacturing) which projects a far greater requirement.</li> <li>• Past development trends have been constrained, by difficulties in the delivery of sites, have ignored the contribution made by strategic sites just outside the boundaries of the Black Country, and do not represent long term demand levels being experienced by the market.</li> <li>• No specific allowance has been made for any losses of employment land, either current or planned (to 2026) or potentially required to accommodate housing growth (2026 to 2036).</li> <li>• No allowance or margin has been made for market churn, to introduce an element of choice, or to hedge against uncertainty despite referring to this in the study's scope.</li> <li>• The overall requirement equates to 38 hectares per annum and is significantly lower than the requirement projected by WECD in its 2014/2015 studies of 56 hectares per annum and does not align with the West Midlands Combined Authority Strategic Economic Plan (SEP) which is seeking much further and faster growth.</li> </ul> <p>The first four reasons are considered in more detail below.</p>

WECD is to be congratulated on their analysis of the potential employment land requirement based on future **GVA growth in manufacturing**. This is particularly relevant to the Black Country due to the significance of this sector to the sub-regional economy and its renaissance in the wider West Midlands in recent years. Paragraph 3.11 of the EDNA refers to 15% of the UK's high value manufacturing being carried out in the Black Country, along with producing 20% of the UK's aerospace output. In addition, reference in the same section of the report is made to Wolverhampton being ranked as the number one western European city for manufacturing in terms of job creation.

The GVA "growth in manufacturing" model projects an overall employment land requirement of between 400-500 hectares as a base line and between 1,310-1,593 hectares based on the super SEP scenario. It is the latter figure that corresponds with the 250 hectares projected by the employment growth methodology, which is ultimately preferred in association with the past development trends of 540 hectares (in order to derive a total requirement of 800 hectares).

A full rationale for employing the GVA growth based projection is provided in paragraphs 6.25 to 6.28 of the EDNA. In paragraph 6.27, it states

*"Review of past trends shows that the relationship between land requirements and output in the manufacturing sector is relatively strong/resilient in comparison with the relationship between employment and land requirements."*

In addition, in paragraph 6.34 (second bullet point) it notes that the GVA growth model is in alignment with the conclusions of the WECD 2014/15 studies in terms of its annual requirement projected.

Despite these observations, the employment growth model is ultimately employed, resulting in a significant deflation of the overall requirement. The principal reason for this is provided also in the second bullet point to paragraph 6.34. It reads:

*"However, it may be questionable whether such a level of demand would be (financially) sustainable over the long term (i.e. development of a site/sites equivalent to 70 hectares per annum each year to 2036 would require significant investments, given the quality and availability of land in the area."*

Effectively, the GVA growth model for projecting the requirement has been discounted because of concerns about how to deliver the quantity and quality of land required. It is right for there to be concerns about delivering the supply of sites – and this is why a different approach to the Core Strategy is required (as acknowledged by the Issues and Options) – but this should not be a factor in determining the overall and true requirement in the first place.

With regard to **past development trends**, paragraph 5.9 acknowledges that past development rates over the measured period (2001-2013 – reference Figure 5.1) could have been constrained by "shortage of suitable stock or availability of resources to pursue development/completion." In addition, there are two other factors, not referred to by the report, which could have led to a distorted and reduced completion rate than that recorded (i.e. 25 hectares per annum). These are:

- The period takes in the recession of 2008-2012, when very little employment development took place. Since 2012, there has been a significant level of development but this has not been recorded for the purposes of calculating the average annual rate.
- No account has been taken of development just outside the Black Country (within South Staffordshire such as i54) which is considered to contribute to the sub-regional needs of the Black Country.

The true development rate of the past 15 years of land serving the needs of the Black Country (i.e. from 2001 to 2016) is likely to be significantly greater than 25 hectares per annum. Moreover, it is to be re-called that the economic objectives of WMCA and the Black Country are to accelerate growth and associated development considerably above and beyond current development rates.

Paragraph 3.23 of the Issues and Options states:

*“For all scenarios the EDNA assumes that the 300 hectares of occupied employment land already allocated for housing through Local Plans is lost to the employment land supply over the Plan period.”*

However, we can find no such reference in the EDNA to making any allowance for **the loss of employment land** in projecting the overall requirement, although it should. Paragraph 4.19 of the Issues and Options rightly states that any employment land displaced would need to be made up elsewhere.

Reference is made in Figure 7.1 of the EDNA to 203 hectares of employment land identified for housing in Local Plans and a further 280 hectares of employment land that could be considered for release subject to there being an adequate supply of employment land. However, these references are made in Section 7 which covers the supply of employment land to meet employment requirements.

The Issues and Options also makes open reference to the potential loss of significant levels of employment land to help meet housing need. Paragraph 6.54 states that the overall effect of Policies EMP2 and 3 of the Core Strategy is a contraction in employment land from 3,392 hectares in 2016 to 2,754 hectares in 2026 – a loss of 638 hectares. In addition, consideration seems to be being given to the loss of a further 300 hectares from 2026 to 2036, as a potential option to address the significant need for housing.

It is unclear how the significant projected losses of employment land over the plan period to 2036 have been taken into account by the three principal methods employed by WECD in projecting the employment land requirement. In our experience, it is usual practice that an adjustment is made to the requirement for employment land to compensate for any likely future losses of employment land.

The EDNA sets out in paragraph 1.7 the principal means and methodology of developing a picture of future requirements. These include:

*“Due to the presence of uncertainty in the projections of employment (and to introduce an element of choice) a **margin** is added equating to two years’ worth of development.” (Our emphasis).*

However, we can find no express allowance being made in Section 6 for this factor. In addition, it has been practice elsewhere (e.g. G L Hearn’s Leicester and Leicestershire HEDNA of January 2017) to provide a margin equating to five years’ previous development, rather than just two.

We also hold concerns about the estimation of supply. Paragraph 3.26 of the Issues and Options refers to 394 hectares of land either currently available or likely to come forward within the Black Country itself. We cannot understand how this figure has been sourced from the EDNA.

The EDNA assesses supply and presents this in Figure 7.2. This provides a total of 263 hectares on 119 sites. It is to be noted that much of this land is not currently vacant but occupied (i.e. Categories B and C) and, therefore, cannot be guaranteed to come forward for development. Indeed, elsewhere in the report it is noted that the loss of existing employment land to other uses up to 2016 has not been as great as previously projected due to the greater economic resilience of existing businesses.

Of the 263 hectares presented in Figure 7.2, only 227 hectares (on 99 sites) is identified to be of Premium, Very Good or Good quality (Figure 7.4). This suggests the remaining 36 hectares is not of sufficient quality and should not be counted towards supply.

8 Premium sites are listed totalling 82 hectares. None are greater than 17 ha and half are less than 10 hectares. Generally, we consider high quality strategic employment sites should be greater than 20 hectares. This is to be able to accommodate larger requirements of up to 25,000 sq m (250,000 sq ft) and provide a range and cluster of different sized buildings. The larger the size of the site, the greater the agglomeration benefits, including provision of ancillary facilities, such as a food and drink outlet, public transport investment, and open amenity space.

In addition, there are issues of availability, access, residential amenity and deliverability with 6 of the 8 sites , as follows: -

- **Dandy Bank Road, Tansey Green and Dreadnaught Road (12 ha)** - Significant proportion occupied by Dreadnought Tiles, with no known plans to move operations. Site neighbours residential property.
- **Phoenix 10 (16.5 ha)** – Site highly contaminated and unstable, with remediation a complex and lengthy process. Access to strategic road network is unsuitable for a site of this size.
- **Former Moxley Tip (10.37 ha)** – Delivery issues in terms of ground remediation and stability. Will require grant funding to come forward.
- **Former Willenhall Sewage Works (9.7 ha)** – Major issue with site access, with site adjoining residential property on two sides.

- **Former Gasholders (8.7 ha)** – Residential property fronting Darlaston Road is a significant constraint which could require acquisition with CPO powers. Site will also require significant ground remediation.
- **Rear Long Marston Site (7.3 ha)** – Site constraints include ground contamination, land stability, flooding, access, vacant possession, and the effects of a recent fire.

At JLL we are involved in a number of the Premium sites and are hopeful that all can be delivered to the market. However, given the significance and long standing nature of some of the constraints, the need for 3<sup>rd</sup> party input (in the form of grant funding, CPO and current sitting tenants/operators) there is an obvious danger that some of the Premium sites will not come forward and it would be unsafe to place total reliance on them.

Even if all of the Premium sites were delivered during the plan period they would satisfy only a small fraction of the total requirement (800 hectares). Assuming a 20% reduction in the gross site areas to generate realistic development site areas (for reasons articulated below), the 8 sites would contribute 65 hectares. This constitutes just over 8 % of the total requirement and is equivalent to just 1.5 year's demand (based on an annual requirement of 40 ha per annum).

In paragraph 3.26 of the Issues and Options, an assumption is made that a further 90-170 hectares of land in South Staffordshire has the potential to contribute towards meeting Black Country needs. The contribution from South Staffordshire is broken down with 90 hectares made up of remaining land from three of the four Freestanding Strategic Employment Sites identified by the 2012 South Staffordshire Core Strategy (i54, ROF Featherstone and Hilton Cross) and proposed extensions (by the draft South Staffordshire Site Allocations) to i54 (40 hectares) and ROF Featherstone (22 hectares). No allowance has been made for the remaining land at the other Freestanding Strategic Employment Site (Four Ashes). This site was discounted by WECD in its 2014/15 study as a potential contributor to the sub-regional economy of the Black Country as it was deemed to be located too far away from the Black Country.

It is to be noted that the proposed ROF Featherstone allocation extension has been subject to quite extensive objection through the Site Allocations process (including from Historic England and the National Trust on its impact on the listed building Old Moseley Hall). There is still a high degree of uncertainty of how this long vacant site will be delivered, particularly in respect of access, without significant grant funding. This position needs to be carefully monitored.

The other assumed contribution from South Staffordshire is that the proposed West Midlands Interchange will contribute 80 to 100 hectares to the sub-regional employment land portfolio. These proposals are also uncertain as an application for a Development Consent Order for a SRFI has yet to be made. In addition South Staffordshire Council has made it public that it is not supportive.

In any event, this proposal will serve a much larger catchment area than the sub-

region and will represent qualitatively and quantitatively a very specific and narrow market sector – i.e. big box B8 warehousing in buildings greater than 500,000 sq ft. In addition, it is difficult to see how this can contribute to the sub-regional land supply if the adjacent Four Ashes Freestanding Strategic Employment Site has already been discounted on the basis it is too far removed from the Black Country in order to serve its needs.

Finally, it is unclear if the supply of sites has been measured in gross or net developable terms. Generally, gross areas for sites are provided. However, the requirement for sites, specifically those generated by the employment growth or GVA growth methods, are calculated on a net developable basis.

Generally, the difference between a gross site area and the developable area of a site (which includes the development plots and main estate roads) is between 20 to 30%. As an example, the site being promoted by Nurton Developments – Hilton Park, Junction 11 of the M6 – has a gross site area of 88.9 ha but a maximum developable area of 64.9 ha. This constitutes a reduction by 27%.

For these reasons, we consider that the contributing supply is likely to be an over-estimation, possibly to a significant degree. Many of the sites are small in size and a number will not be delivered over the plan period.

Overall, we consider the need and supply of employment land must be re-assessed, otherwise there is a real danger that an insufficient quantum and range of employment land will be promoted. This in turn will threaten the ambitious economic strategy for the sub-region, as stated clearly elsewhere in the Issues and Options. We would be happy to be involved in any such reassessment, working with WECD, to ensure that this part of the evidence base to the Core Strategy Review is as robust as possible and provides a firm platform for planning the right quantity and quality of employment land to serve the Black Country.

**Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.**

Chapter / Page / Question / Paragraph
Key Issue 6 – Reviewing the role and the extent of the Green Belt – Question 5
<b>Do you agree or disagree with the approach set out in the relevant section and / or question?</b>
Agree
<b>Comments (continue on a separate sheet if necessary)</b>
<p>Yes. Paragraph 3.47 states that the Green Belt Review will be carried out in conjunction with South Staffordshire Council. Two reasons are provided:-</p> <ul style="list-style-type: none"> <li>• A large proportion of Black Country urban fringe extends into South Staffordshire.</li> <li>• Strong housing market and economic links between the Black Country and South Staffordshire.</li> </ul> <p>The second reason is corroborated in terms of economic links by both the EDNA and elsewhere in the Issues and Options. The EDNA, in Section 4, sees both South Staffordshire and Birmingham as areas of strong economic transactions with the Black Country. It concludes that these two areas, along with the Black Country, comprise a natural FEMA.</p> <p>Paragraph 3.60 refers specifically to the relevance of South Staffordshire in terms of employment land. It states:</p> <p><i>“South Staffordshire also has a crucial role to play in contributing towards meeting the employment land needs of the Black Country, reflecting the interlinked economies of the area. The South Staffordshire land portfolio is largely focused on meeting demand for large, highly accessible premium sites that cannot be physically accommodated in the Black Country. These sites include the hugely successful i54 business park which is home to a number of international businesses including Jaguar Land Rover.”</i></p> <p>However, it is vital that the scope of the Green Belt Review looks beyond just the urban fringes of the Black Country, particularly in terms of employment land. Good employment land, particularly larger strategic sites (which are in short supply in the Black Country), have specific requirements. These are:</p> <ul style="list-style-type: none"> <li>• Quick and direct access to the national motorway and strategic road network, avoiding congested A or minor roads, particularly those that have to route through built-up or residential areas.</li> </ul>



- Good penetration to the local job market, with particular regard to good existing or potential public transport links.
- Sufficient size to accommodate large buildings or a cluster of different sized buildings (with sites generally larger than 20 hectares required).
- Slightly removed from existing or proposed housing to allow total flexibility in terms of use, building design (i.e. height of buildings) and operation (ie 24/7).
- A pleasant, well designed and landscaped setting, with amenities for occupiers, in order to attract and retain staff.

Such sites, by their very nature, are not usually found either within the built up area of the Black Country or on the urban fringe to it. Instead, their area of search will extend further into the Green Belt along the principal motorway and A route network serving the sub-region.

It is essential that the scope of the Green Belt Review recognises this and has a suitably wide geographical remit. Otherwise, some of the best potential employment land opportunities will be overlooked.

**Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.**

<b>Chapter / Page / Question / Paragraph</b>
Strategic Options 1A and 1B - Question 11a
<b>Do you agree or disagree with the approach set out in the relevant section and / or question?</b>
Comment
<b>Comments (continue on a separate sheet if necessary)</b>
<p>We support both Options 1a and 1b, but consider Option 1b to be preferable if the release of existing unsuitable employment land is managed appropriately.</p> <p>We support both options as they recognise that a radical approach is required – i.e. releasing significant areas of the Green Belt in order to accommodate the relevant pressures for both housing and employment. With the latter, there is an express acknowledgement that there is a need to increase the employment land stock, as recommended by the EDNA.</p> <p>Option 1b is considered by the Issues and Options to be a more radical approach as it looks to restructure some of the existing Regeneration Corridors, with some existing employment land being replaced by housing. However, this process is part of a long term recycling of land where unsuitable existing employment land, particularly those areas poorly located in terms of road access and with no future prospect, is best developed at the end of its economic life for more sustainable uses such as housing.</p> <p>Moreover, the ability of the Growth Network to yield good quality employment land is diminishing. Most of the obvious well located large brownfield sites have already been developed. The Premium sites now identified by the EDNA are all relatively small and most are heavily constrained.</p> <p>Option 1b recognises this and looks to the Green Belt where there are much clearer and better opportunities for development, particularly for large Premium employment sites. As such, we see Option 1b as a much more effective and deliverable strategy.</p>

**Please state clearly the section of the Issues and Options document you are commenting on and include question numbers and chapter titles where relevant. This will help us to fully take your comments into account.**

<b>Chapter / Page / Question / Paragraph</b>
Strategic Option Area 2B – accommodating employment land growth outside the urban area – Questions 16 - 19
<b>Do you agree or disagree with the approach set out in the relevant section and / or question?</b>
Comment
<b>Comments (continue on a separate sheet if necessary)</b>
<p>We consider all four options need to be properly explored given that there is a significant need for new employment land outside the existing Growth Network and Regeneration Corridors. As referred to in our response to Question 4, we consider that the actual need for new employment land, particularly for large Premium sites, is much more significant and pressing than currently projected.</p> <p>In settling on an option, or combination of options, it is vitally important to choose sites that will best respond to what the market requires. The market requirements, or characteristics, for best quality land are set out in our response to Question 5. For ease of reference, these are:</p> <ul style="list-style-type: none"> <li>• Quick and direct access to the national motorway and strategic road network, avoiding congested A or minor roads, particularly those that have to route through built-up or residential areas.</li> <li>• Good penetration to local job market, with particular regard to good existing or potential public transport links.</li> <li>• Sufficient size to accommodate large buildings or a cluster of different sized buildings (with sites generally larger than 20 hectares required).</li> <li>• Slightly removed from existing or proposed housing to allow total flexibility in terms of use, building design (ie height of buildings) and operation (i.e. 24/7).</li> <li>• A pleasant, well designed and landscaped setting, with amenities for occupiers, in order to attract and retain staff.</li> </ul> <p>We consider that Options E2 and E4 are most likely to fulfil these requirements. Moreover, given the scale of the shortfall of employment land (i.e. the gap between the projected requirement and identified supply), which we believe will grow once reassessed in the light of our comments to Question 4, we consider that Option E4 will be required, particularly in respect of finding larger Premium sites.</p>

Nurton Developments is promoting just such a site at Hilton Park, Junction 11 of the M6 motorway. This site has direct access to the A460 at Junction 11 and has a gross area of almost 90 hectares (developable area of up to 65 hectares) and is capable of accommodating close to 250,000 sq m of industrial and distribution floorspace in a range of buildings from 2,500 sq m to 25,000 sq m of B1c, B2 & B8 use to meet the sub-regional needs of the Black Country and the local needs of South Staffordshire.

We have submitted a Call for Sites form for the site and support this with a Development Prospectus. This prospectus provides much greater details of the site, introduces some indicative proposals, considers the site's connectivity and sustainability credentials, and assesses the contribution the site makes in terms of the Green Belt.