



Research Report
Jones Lang LaSalle Incorporated

Technical Note on Deliverability

Land at Hilton Park, Junction 11, M6 – a new Freestanding Strategic Employment Site

Nurton Developments (Hilton Park) Limited

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Contents

Introduction	3
Planning Policy Background and Employment Land Need	4
Site Characteristics and Impact of Link Road	6
Revised Master Plan	9
Transportation Issues	12
Infrastructure	14
Feasibility	15
Conclusion	17
Appendix 1 – Indicative Master Plan (Drg No. 5687-055)	
Annex 1 – Updated Preliminary Ecological Appraisal	
Annex 2 – Transport Strategy	
Annex 3 – Preliminary Infrastructure Statement	

1. Introduction

- 1.1. Nurton Developments (Hilton Park) Limited (NDHP) is promoting land at Hilton Park, Junction 11, M6 (the Site) as a new Freestanding Strategic Employment Site covering the full spectrum of B Class uses (i.e. B1, B2 and B8).
- 1.2. In 2017, JLL produced on behalf of NDHP a Development Prospectus of the Site. This prospectus informed responses to Call for Sites exercises launched by both the Black Country Local Planning Authorities and South Staffordshire District Council as part of an evidence gathering exercise to their respective development plan reviews.
- 1.3. The Development Prospectus sought to illustrate the potential for development at the Site. It covered such issues as: -
 - Market overview
 - Site characteristics
 - Connectivity
 - Sustainability
 - Initial development proposals
 - Green Belt contribution
- 1.4. The purpose of this Technical Note is twofold:
 - Illustrate the latest thinking on the opportunity for development at the Site.
 - Demonstrate that the proposed scheme is deliverable.
- 1.5. The latest thinking on the master plan has been influenced by the submission of an application for a Development Consent Order (DCO) for the proposed M54/M6 link road through the Site. The impact of this scheme, and the position of NDHP to it, is covered in Section 3.
- 1.6. Section 4 introduces a revised master plan and explains changes made due to the land take of the M54/M6 link road, the proposed acquisition by NDHP of additional land fronting the A460, revised cut and fill, and ecological and bio-diversity considerations. It also considers the quantum of development and its quality and mix.
- 1.7. Sections 5, 6 and 7 address the deliverability of the Site for development. Specifically, they cover transportation, infrastructure and feasibility respectively.
- 1.8. To provide some context to these sections, the next section (Section 2) provides a brief overview of the relevant planning policy background and, specifically, the issue of employment land need.

2. Planning Policy Background and Employment Land Need

- 2.1. The Site is situated in the District of South Staffordshire. The District falls in the same Functional Economic Market Area as Wolverhampton, Dudley, Walsall and Cannock.
- 2.2. The Development Plan for the site is formed by the 2012 adopted Core Strategy and the 2018 adopted Site Allocations Document. The Site is located within the Green Belt. This constrains any development outside the built-up area of the Black Country, including most of South Staffordshire.
- 2.3. The principal employment allocations in South Staffordshire are i54 and ROF Featherstone – both located close to Junction 3 of the M54 motorway. The former has been successful and was extended by the Site Allocations Document by 40 hectares. This land has now been brought forward for development. The latter is a longstanding allocation (being designated over 20 years ago), that was extended to 36 hectares by the Site Allocations Document. However, it has not come forward for development due to road access issues and other site constraints. Both allocations are being promoted to meet sub-regional growth (i.e. meeting the needs of the Black Country) as well as meeting the local needs of South Staffordshire.
- 2.4. The South Staffordshire Local Plan Issues and Options (Autumn 2018) refers to there being a large shortfall of employment land to meet the needs of the Black Country. It acknowledges that South Staffordshire could have a role meeting part of this need and that further extensions to existing Freestanding Strategic Employment Sites (e.g. i54 and ROF Featherstone) are unlikely to be able to accommodate the potential scale of development required.
- 2.5. South Staffordshire also has a much increased housing need, with some of this need emanating from overspill from Birmingham and the Black Country. The Issues and Options acknowledges that substantial Green Belt releases are likely to be required to accommodate development pressures (for both housing and employment) and a different approach needs to be taken than the adopted Core Strategy in terms of spatial development strategy.
- 2.6. An important context to the South Staffordshire Local Plan review is the review of the Black Country Development Plan. This has a similar timescale to the South Staffordshire Local Plan. The Issues and Options were consulted upon in Autumn 2017 and the Draft Plan is scheduled to be published for consultation in summer/autumn 2021. Recently, the Black Country Local Planning Authorities have announced another Call for Sites exercise.
- 2.7. The Black Country Development Plan Issues and Options identified a potential substantial need for employment land for the Black Country from 2016 to 2038 (ranging from 592 hectares to 870 hectares), but only a limited supply of 305 hectares to meet this need. It is acknowledged that this shortfall – between 287 and 565 hectares – requires support from other neighbouring local authorities, particularly South Staffordshire, in order to meet this need.
- 2.8. Some of this need may be met by West Midlands Interchange, which received consent in May 2020 for 190 hectares of large rail related warehousing (Class B8 only). However, its contribution will be limited by its location at Four Ashes (i.e. in the northern extremity of the FEMA), its much wider remit as a strategic rail freight interchange (i.e. serving a much larger area than the Black Country and South Staffordshire) and its restricted quality (i.e. just very large B8 floor plate buildings).

- 2.9. The shortfall in Black Country employment land is not just quantitative. It is acknowledged there is also a serious qualitative shortage of good quality employment sites in the Black Country. Specifically, there are very few sites greater than 10 hectares which are well located, not constrained by neighbouring housing and are deliverable. We are aware of a number of Black Country based companies who have not been able to satisfy their requirements for new premises and had to relocate outside the Black Country.
- 2.10. Another context is the production of the West Midlands Strategic Employment Sites Study. This study was commissioned by Staffordshire County Council (on behalf of the three main West Midlands LEAs – Birmingham and Solihull, Coventry and Warwickshire, and the Black Country – and the County Council) in early 2019. The study has been produced in draft by Avison Young and Arcadis and is due to be published later this summer.
- 2.11. Its purpose is to review the market for large employment sites on a regional basis, assess whether and where there is still a gap between demand and supply, and identify the best locations and criteria for suitable sites in order to meet any shortfall. A previous study (in 2015), part produced by JLL (with PBA), identified a shortage of sites in three particular sub-regions – East Birmingham/Solihull, Coventry and Warwickshire and the Black Country/southern Staffordshire.
- 2.12. JLL has been consulted and has commented on the draft study. The study concludes that there is a real shortage of strategic employment sites serving the West Midlands and an urgent need for additional sites to be brought forward. It recommends the Black Country and South Staffordshire as one of four key market locations where the identification of strategic employment sites should be focussed on.
- 2.13. The study makes specific reference to a small number of strategic highway improvements to unlock future development land. This includes the M54/M6 link road.
- 2.14. The study also provides a high-level assessment of sites being promoted by developers. This assessment looks at 31 sites greater than 25 hectares (gross) and considers criteria such as motorway/trunk road access, statutory designations, public transport, flood risk, ecology, topography and proximity to existing settlements.
- 2.15. Scores range from 11-19, with the lower the score the better the fit of the development opportunity with the assessment criteria. Hilton Park achieves a score of 12 – one of the best scores out of the 31 sites assessed.

3. Site Characteristics and Impact of Link Road

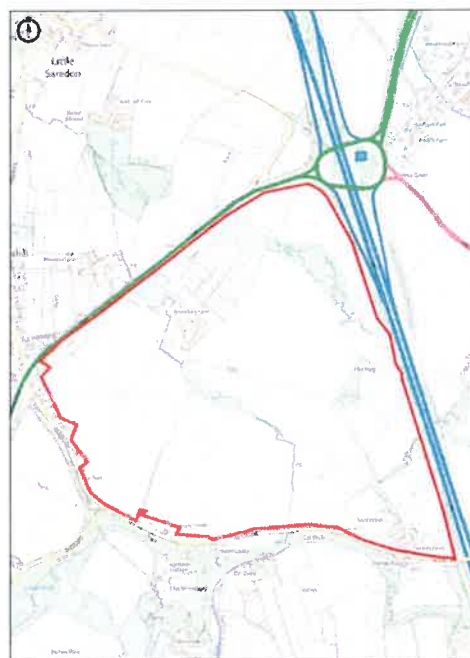
- 3.1. The Site is located north east of Wolverhampton and south west of Cannock. It is located directly to the south west of Junction 11 of the M6 motorway. Figure 1 below provides a location plan.

Figure 1 – Location Plan



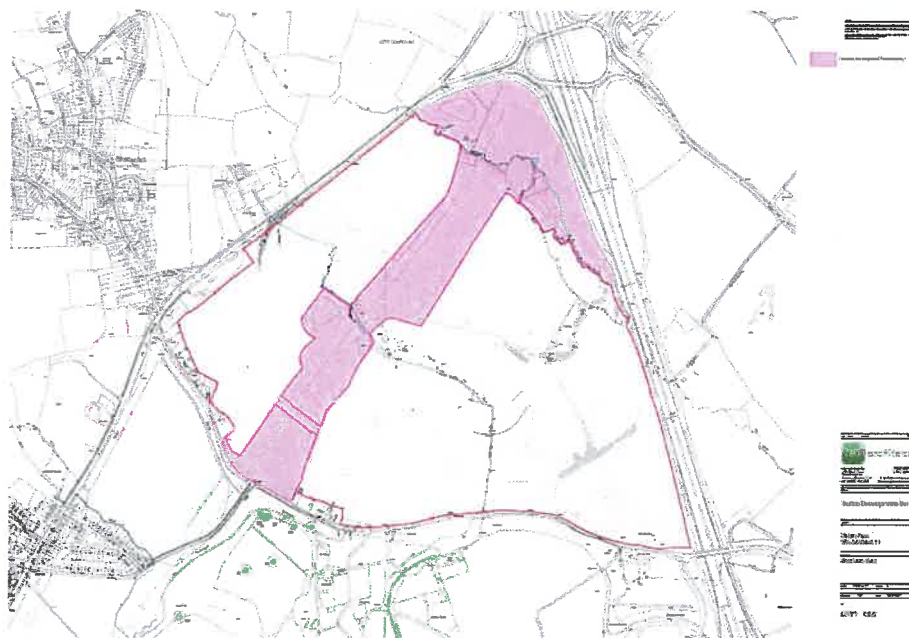
- 3.2. The extent of the Site, and its immediate situation, is depicted in more detail on the plan below (Figure 2). The boundaries of the Site are marked in red.

Figure 2 – Situation Plan



- 3.3. The Site has a gross area of 99.23 hectares (245 acres). In market terms, the Site enjoys many significant advantages. These include: -
- Location immediately adjacent to the south west of Junction 11 of the M6 motorway.
 - Direct access to the A460, which connects to the M6 at Junction 11.
 - Easy access via the A46 to the Pentalver Rail Freight Interchange at Cannock and, in time, to West Midlands Interchange at Gailey (Junction 12, M6).
 - A location accessible to the principal settlements of the area (i.e. the Black Country, Cannock, Stafford and Lichfield), giving good reach to local labour supply.
 - A regular shaped site that enjoys prominence to the M6.
 - A large site that can accommodate a critical mass and range of buildings by type and size.
- 3.4. The proposed M54/M6 link road runs through the Site. Highways England submitted an application for a Development Consent Order (DCO) for this road to the Secretary of State on 31 January 2020. Construction of the road is due to commence in 2021 and be operational by 2024.
- 3.5. The plan in Figure 3 below identifies the proposed permanent land take of the road from the Site – the area shaded light purple. This reduces the gross area of the Site to 75.69 hectares (187 acres).

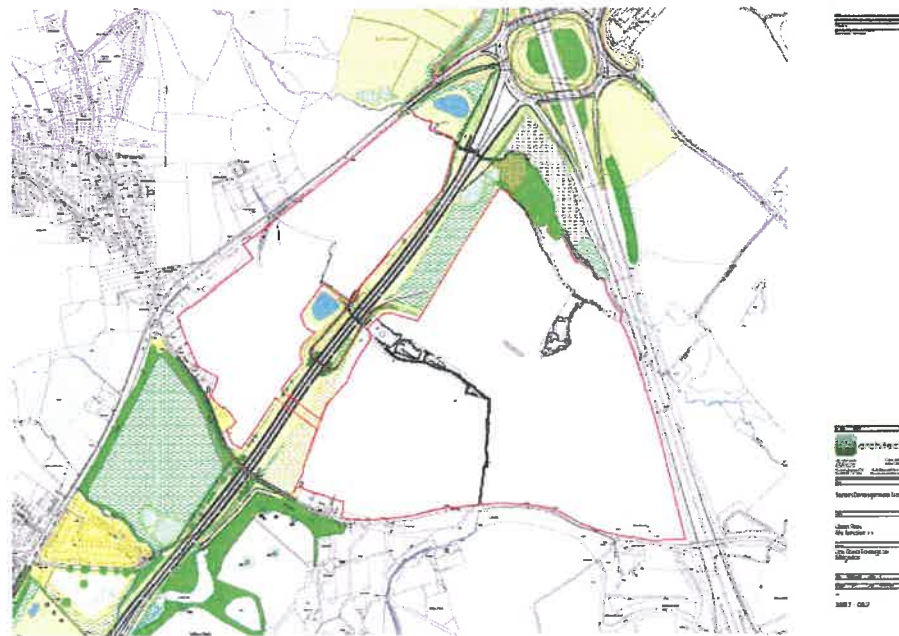
Figure 3 – Land Take of Link Road



3.6. The plan in Figure 4 below provides more detail. It shows: -

- The horizontal alignment of the road.
- Its specification – i.e. dual carriageway.
- Tree planting to compensate for loss of woodland and for landscape and visual screening.
- Attenuation basins for surface water drainage.
- Ecology ponds for bio-diversity off-setting.

Figure 4 – Detail of Link Road and Associated Landscaping



- 3.7. NDHP supports the construction of the road on this alignment in principle. The link road, once built, will significantly release road capacity on the A460 and will make Junction 11 a much stronger nodal point on the national and regional motorway network. It will provide a “crossroads” connection to the M54, M6 and M6 (Toll).
- 3.8. The link road does not present any fundamental constraint of the development of the land. There is no planning policy or guidance in Circular 02/3 that could enable Highways England to prevent NDHP building a bridge to serve its proposed development.

4. Revised Master Plan

- 4.1. The Development Prospectus contained a preliminary master plan. At that stage, the route of the link road was not known.
- 4.2. The master plan has subsequently moved through several iterations and is rooted by a much firmer base of technical evidence. This includes: -
 - A fixed position in terms of the alignment of the link road and associated land take (as covered in Section 3).
 - A more detailed Cut and Fill Analysis by engineers, Shepherd Gilmour Infrastructure (SGI).
 - Updated Preliminary Ecological Appraisal by environmental consultants, RPS.
 - A review of Drainage Strategy by SGI.
- 4.3. In addition, the Site now includes Brookfield Farm. This adds 10.33 hectares (25.5 acres) to the overall gross site area and a much greater frontage to the A460.
- 4.4. The indicative master plan (Drg No. 5687-055) is provided below in Figure 5. A larger scale version is provided in **Appendix 1**.

Figure 5 – Indicative Masterplan



- 4.5. The total development site area is 43.10 hectares (106.5 acres). This is a significant reduction on the gross site area (less the land take of the link road) of 75.69 hectares (187 acres). This is because of a substantial provision of green infrastructure amounting to 32.58 hectares (80.52 acres). This green infrastructure includes: -
- Habitats of known ecological value to be retained, protected and where appropriate to be enhanced.
 - Additional agricultural land of little ecological value proposed for bio-diversity enhancement and Great Crested Newt mitigation.
 - Creation of natural wetland areas as part of the sustainable drainage strategy.
 - A 30m wide landscape buffer along the southern boundary to Hilton Lane.
 - Utilisation of the cuttings and embankments to the development plateaus for the establishment of scrub planting and the creation of meadow grassland.
- 4.6. This provision, along with the landscaping and ecological enhancement of the land associated with the link road, will provide a very strong framework of green infrastructure to the Site.
- 4.7. A copy of the updated Preliminary Ecological Appraisal is provided in **Annex 1**. It concludes that:
- “The vast majority of the habitats that will be lost as a result of development have low ecological value. The loss of localised areas of higher value habitat, that cannot be retained and protected within the development layout, will be mitigated or compensated within the site wherever possible.”*
- 4.8. In terms of the current development proposals, it provides the following assessment:
- “The illustrative master plan sets a framework through which long term bio-diversity value can be integrated into the site through appropriate habitat creation and long term habitat management for wildlife. The detailed design will be consistent with all bio-diversity planning policy requirements and comply with all relevant wildlife legislation through the delivery of new managed green infrastructure, connected to habitats being created as part of the M6/M54 link road and the wildlife corridors in the wider landscape”.*
- 4.9. The illustrative master plan proposes a total floor space of 173,853 sq m (1.87 million sq ft). This is a substantial scale of development relative to other proposals serving the Black Country sub-regional market.
- 4.10. The proposals seek to provide a range and choice of units by both size and type. The scheme provides:
- Large industrial sized units, ranging from 122,000 sq ft to 231,500 sq ft (although larger buildings could be provided to meet bigger enquiries).
 - Mid-sized industrial units, ranging from 20,500 sq ft to 47,000 sq ft (again, there is flexibility on the plots to provide larger units of up to 100,000 sq ft).
 - Small industrial units of 2,500 sq ft each.
 - Stand-alone offices of 10,000 sq ft each, which could be sub-divided, and totalling 50,000 sq ft.
 - A public house and lodge.

- 4.11. The scheme has been designed to appeal to local, sub-regional and regional markets, capturing both organic and inward investor demand. The size and range of units will be able to accommodate companies from local SMEs to large international corporates.
- 4.12. The Black Country and South Staffordshire has an acknowledged shortfall of employment development site opportunities. This shortage is both quantitative and qualitative. Hilton Park has all the necessary attributes to help plug this gap. The proposals have been designed to maximise the opportunities available for companies looking for new premises in the sub-region.

5. Transportation Issues

- 5.1. A separate technical note on Transport Strategy has been produced by DTA. This forms **Annex 2** to this statement.
- 5.2. The Transport Strategy addresses the following issues: -
- Consultation with relevant highway authorities – Highways England and Staffordshire County Council.
 - Trip generation and distribution.
 - Traffic impact.
 - Vehicular access.
 - Labour catchment.
 - Public transport strategy.
 - Air quality management.
- 5.3. Discussions have been ongoing with Highways England to review and agree the headline traffic generation principles of the development proposals and their relationship with the M54/M6 link road. The trip rates and strategic distribution of traffic from the Site have been agreed with Highways England. In addition, Staffordshire County Council has been consulted on the proposals and the implications discussed in headline terms.
- 5.4. The proposed M54/M6 link road will free up capacity on the A460 to a significant extent. It will reduce peak flows by nearly 2,000 vehicles an hour. The proposed development scheme is forecast to add less than 100 vehicles per hour two way on the A460 south of the Site and, therefore, can be readily accommodated. To the north, the improved Junction 11 will accommodate greater traffic volumes, with DTA's assessment showing the junction to be operating within capacity well into the future.
- 5.5. The local highway network will, therefore, have sufficient capacity to accommodate the development. At this stage there are not anticipated to be any off-site highway improvements or mitigation works required.
- 5.6. The Site can be accessed directly from the A460 and is well placed to benefit from the future M54/M6 link road and proposed improvements to Junction 11. It is highly suitable for substantial high quality employment development serving both local and strategic markets.
- 5.7. DTA has consulted with Staffordshire County Council about the design of the access from the A460. Previously, a roundabout junction was proposed. This has been replaced with a realigned road, with priority through to the Site. This will reduce the attractiveness of the A460 south of the Site access for through or development related traffic.
- 5.8. The development proposals are likely to generate about 4,000 new job opportunities. The transport strategy seeks to ensure that these opportunities are accessible to as wide and diverse a labour catchment as possible.

- 5.9. The Site is located within a 30 minute drive time of a number of key potential employment generators – i.e. areas of good labour supply. These include Wolverhampton, Walsall, Wednesbury, Lichfield, Stafford and Rugeley. It also covers the Sandwell Travel to Work Area, which is particularly deprived and would benefit from employment opportunities provided by the proposed development.
- 5.10. The Site is well located in terms of existing settlement and public transport networks. It also offers significant opportunities to improve accessibility, including the provision of high quality, site specific, public transport shuttle buses and comprehensive travel planning measures. Such measures have proved very successful on similarly located large scale industrial developments, significantly reducing the need to travel by car. These will be proposed as part of any development proposals for the Site.
- 5.11. The Site is not within an Air Quality Management Area. In addition, the link road should result in improvements in air quality due to reduction in traffic congestion along the A460.

6 Infrastructure

- 6.1. NDHP has commissioned SGI to review the constraints of the site and identify how necessary infrastructure can be delivered to overcome such constraints. A copy of their Preliminary Infrastructure Statement is provided in **Annex 3**.
- 6.2. The Preliminary Infrastructure Statement provides a clear explanation on how the infrastructure of the proposed development can be provided. It looks at all aspects of the infrastructure provision and has demonstrated that, in terms of servicing and access, the Site is fully deliverable. The report provides also a review of the likely cost of the provision of the required infrastructure. This is considered in the next section.
- 6.3. The statement covers: -
 - Flood risk and drainage.
 - Utilities
 - Cut and fill
 - Access and bridging.
- 6.4. The proposed site is located within Flood Zone A. As such, there is low risk of flooding.
- 6.5. The surface water run-off generated by the proposals will discharge at a greenfield run-off rate to one or more of the ordinary water courses located on Site. This will be by way of attenuation basins and natural wetland areas.
- 6.6. Foul water effluent will discharge to the nearby public sewers via an on-site pumping station.
- 6.7. The Site is located close to existing settlements and main roads, with an established utilities network. In each case, electricity supply, telecommunications, potable water supply and gas supply will require reinforcement. However, there are no obstacles to gaining connections with the respective networks fully accessible without the need for third party land.
- 6.8. The cut and fill exercise, to create development plateaus, is balanced. There is no requirement to either import or export materials.
- 6.9. A new bridge is required to span the M54/M6 link road. The specification of the bridge will be designed to meet Highways England's and Highway Authorities adoptable standards. There are no planning or design constraints to providing for this link.

7. Feasibility

- 7.1. The Preliminary Infrastructure Statement by SGI provides an assessment of abnormal costs in Appendix F in SGI’s statement. This covers the provision of infrastructure in order to service and deliver the Site for built development for strategic employment purposes.
- 7.2. In addition, NDHP has consulted with SGI, RPS and DTA to produce estimates for:
- Bio-diversity off-setting.
 - Great Crested Newt mitigation.
 - Green infrastructure.
 - Public transport plan.
- 7.3. A summary of these costs, and those provided in SGI’s Preliminary Infrastructure Statement, are presented below in **Table 1**.

Table 1: Assessment of Infrastructure and Other Abnormal Costs

Infrastructure Requirement	Associated Cost (£)
Access from A460	£750,000
Bridge over link road	£3,500,000
On site access road	£2,744,000
Public transport plan	£2,000,000
Surface water attenuation	£1,677,500
Foul water pumping stations	£1,000,000
Off site foul rising main	£500,000
Utility service connections	£5,335,000
Cut and fill	£3,642,160
Biodiversity offsetting	£1,000,000
Great Crested Newt mitigation	£500,000
Other green infrastructure	£500,000
Total	£23,148,660

- 7.4. It is to be emphasised that these are estimates. All aspects of infrastructure provision will be competitively tendered and it is anticipated that this should lead to reduced costs with certain elements.
- 7.5. The total cost of £23.15 million is substantial. However, the scale of the site ensures it is manageable. The total cost equates to:
- £123,800 per gross acre (based on a gross area of 187 acres)
 - £217,000 per developable acre (based on a developable area of 107 acres).
- 7.6. Comparable values for serviced employment land in the Black Country of this scale are hard to trace as there have been few recent transactions. This is because of the shortage of such opportunities.
- 7.7. However, JLL did act on the sale of 25 acres of fully serviced and consented employment land at Four Ashes to Panattoni in 2018. This transaction was struck at £500,000 per developable acre.

- 7.8. The site at Four Ashes is not as well located as Hilton Park. It is not sited on a motorway junction, is further away from the main conurbation of the Black Country and Birmingham, and is not as well served by local amenities and public transport. In addition, the market has seen some growth in values over the last few years.
- 7.9. For these reasons, we consider that values on a per developable acre basis for Hilton Park will be in excess of £500,000 per developable acre, lying in the range of £550,000 - £650,000 per developable acre. This is still a significant discount on land values achieved in Birmingham and Coventry.
- 7.10. Values achieved in this range will be comfortably greater than the assessed cost of £217,000 per developable acre. As such, the proposals are demonstrably feasible.

8. Conclusion

- 8.1. National Planning Policy Guidance requires potential development applications to be justified on the basis that they are: -
- Available.
 - Suitable.
 - Achievable.
- 8.2. The availability and suitability of the opportunity as a new Freestanding Strategic Employment Site has already been demonstrated through the Call for Sites submissions in respect of the evolving Black Country Development Plan and the South Staffordshire Local Plan. These submissions were supported by a Development Prospectus.
- 8.3. This Technical Note demonstrates that the Site is achievable in terms of overcoming constraints. These constraints include: -
- The M54/M6 link road that routes through the Site.
 - Other transportation issues, including access from the A460, traffic generation and public transport.
 - Ecology.
 - Topography.
 - Flood risk and drainage.
 - Utility and services connection.
 - Other infrastructure requirements.
- 8.4. Solutions to mitigate these constraints have been identified and costed. The scale of the development ensures that the assessed costs can be absorbed comfortably by the values created by the development proposals.
- 8.5. The proposed development will provide for a mix and range of B class buildings that can accommodate and attract both existing companies and inward investors, whether SMEs or large international companies. The development proposals are also likely to generate about 4,000 new job opportunities.
- 8.6. The Black Country and South Staffordshire has an acknowledged shortage of employment development site opportunities. This shortage is both quantitative and qualitative. Hilton Park has the necessary attributes to help plug this gap and the proposals have been designed to maximise the opportunities available for companies looking for new premises in the sub-region.

Appendix 1 – Indicative Master Plan (Drg No. 5687-055)
