

**South Staffordshire Council**

**Local Plan Review**

# **Preferred Options**

## **Employment Sites: Site Assessment Topic Paper**

**September 2021**



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# 1. Introduction

## The Purpose of this Paper

- 1.1. The purpose of this Topic Paper is to set out how the Council has assessed and allocated employment site options to meet employment land requirements as part of the Local Plan review to cover the period 2018-2038.
- 1.2. The criteria used for site selection have been partly informed by consultation responses received from relevant questions posed through the Issues and Options Paper, and in order to achieve consistency, largely reflect the criteria adopted for the housing site assessment(s). In order to show how sites performed against the various criteria, we have prepared detailed site assessment proformas for each site option. Each proforma summarises key elements of the Council's evidence base and site survey process relevant to each site. The Council has considered all factors in the round when arriving at proposed allocations for the Preferred Options Local Plan. However, as the Local Plan progresses should the evidence suggest that further allocations are required then these site assessments will form the basis of these decisions.
- 1.3. Within the context of this Topic Paper, employment land relates to development or uses falling within the B1, B2 and B8 planning use classes<sup>1</sup>. For these purposes, the amendment to the use classes implemented on 1 September 2020 (in response to the Covid-19 pandemic) affecting Class B1 (Business) is ignored. The Local Plan referred to in this Topic Paper (either as the Local Plan or emerging Local Plan) is currently at the Preferred Options consultation stage, published in September 2021.
- 1.4. This paper must be read alongside the Council's Local Plan Review Preferred Options consultation, which summarises the selected employment site(s), the wider employment strategy the Council proposes and the next steps the Council will undertake following the current consultation.

## Previous Consultation Comments Received

- 1.5. A number of comments were received relating to employment land considerations as part of the Issues and Options Consultation. Responses to questions 20 and 21 are of most relevance to assessing employment sites.

Question	Support Option A	Support Option B	Support Option C	Support Option D	Mixed Option
20	7 (37%)	3 (16%)	0 (0%)	4 (21%)	5 (26%)

- 1.6. In response to question 20 (which strategy option should be pursued for employment locations for growth?), the largest support was for Option A – to continue with the existing policy approach by focusing employment growth around existing freestanding strategic employment sites. Behind this, the second most popular option was a mixed approach to employment site locations across

<sup>1</sup> As per the Town and Country Planning (Use Classes) Order 1987 (as amended).

all employment growth policy options. A similar level of support was shown for Option D – to deliver employment allocations as part of mixed-used schemes (such as new settlements and Sustainable Urban Extensions). Whilst there was little to no appetite for Options B (identify new freestanding employment sites) and C (deliver smaller scale employment allocations in the district's larger villages).

1.7. In response to question 21 (what criteria should be considered for new strategic sites for employment growth), the following suggestions were made:

- Access to Strategic Road Network and rail freight network,
- Access to local and sub-regional workforce (and by a choice of means of transport),
- Site size sufficient in scale for a range of building sizes,
- Site location to be separated from substantial settlement(s),
- Site to be located within a well landscaped setting,
- Site to be located near to the Black Country (in the south of the District),
- Site ownership situation,
- Market interest in the site,
- Access to utilities infrastructure,
- Timescale for site deliverability, and
- Suitability of the site to deliver employment uses.

## 2. National Policy

- 2.1. The [National Planning Policy Framework](#) (NPPF) sets out the Government's planning policies for England and explains how they should be applied. It provides a framework within which locally prepared plans for development should be produced. It emphasises that the purpose of the planning system is to contribute to the achievement of development underpinned by the three pillars of economic, social and environmental sustainability.
- 2.2. In relation to the economic objective, the NPPF states that the planning system should help build a strong, responsive and competitive economy, by ensuring that a sufficient supply of land of the right type and quality is available in the right place and at the right time to support investment, innovation and improved productivity. The Local Plan should identify and coordinate the provision of infrastructure to deliver these objectives. Strategic policies should provide for objectively assessed employment land needs and maintain sufficient flexibility to adapt to rapid change.
- 2.3. The NPPF states that planning policies should assist in creating the conditions in which businesses can invest, expand, and adapt. They should also recognise and address the specific locational requirements of different economic sectors. This will involve proactive planning to meet the development needs in the District, setting out how much land is required and identify allocations to satisfy this demand. The emerging Local Plan must ensure that there is sufficient local supply within South Staffordshire for businesses to locate and expand and to attract new economic activity and investment into the District.
- 2.4. Paragraphs 81 and 82 specifies that planning policies should set out a clear economic vision and strategy to positively and proactively encourage sustainable economic growth (across different sectors and their specific requirements), set criteria or strategic sites for local and inward investment to meet identified needs, address barriers to investment, and be flexible to accommodate unanticipated needs or respond to changes in economic circumstances.
- 2.5. The Government's [Build Back Better: our plan for growth](#) replaces the UK's Industrial Strategy (2017) and details the strategies central government has identified where implementation will facilitate the renewal and development of the British economy following the Covid-19 pandemic. The Council believes its policies pertaining to economic strategy align with the Government's approach to provide the infrastructure and skills necessary for economic innovation and will play a role in supporting and delivering these objectives.
- 2.6. The emerging Local Plan will also contribute towards the ambitions of Stoke-on-Trent and Staffordshire Local Enterprise Partnership as laid out in their Strategic Economic Plan, and Staffordshire County Council's Economic Recovery and Renewal strategy, by providing the business environments and infrastructure to deliver the conditions for economic prosperity.

### 3. Local/Sub-regional position

- 3.1. Whilst the authority has an existing evidence base to inform the economic element of the adopted Core Strategy (2012), this has been refreshed through a suite of updated evidence in order to inform the Local Plan review. Principally this has included refreshing the Strategic Housing and Employment Land Availability Assessment (SHELAA) alongside undertaking an Economic Development Needs Assessment (EDNA) in two parts. This includes an objective review of employment land needs of South Staffordshire District.

#### Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 3.2. The Council has undertaken many 'Call for Sites' consultations over a number of years. This invites landowners and agents to submit details of sites including location, site size, details of site constraints, and landowner willingness. These sites form the basis of the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), which lists all of the sites formally suggested to the council for housing or employment use.
- 3.3. Through the SHELAA existing employment sites have been assessed in terms of their suitability for housing. Meanwhile, sites put forward as potential employment sites were reviewed in detail through our stage 2 Economic Development Needs Assessment in a manner consistent with the requirements for assessing sites through the SHELAA process as set out in Planning Practice Guidance<sup>2</sup>.

#### Economic Development Needs Assessment (EDNA)

- 3.4. The first part of the EDNA (EDNA(1)) predominantly establishes the employment land position of the District in 2018. This includes a review of the employment land supply, including setting out the existing commercial property market performance. Coupled with an analysis of the key socio-economic landscape of the district (around employment, business development, demographics and labour markets) – within the context of the Functional Economic Market Area (FEMA) of South Staffordshire, Cannock, Dudley, Walsall and Wolverhampton. The report was able to draw a preliminary conclusion as to employment land needs of the District across the forthcoming plan period.
- 3.5. The second part of the EDNA (EDNA(2)) is an initial review of site options for new employment sites suggested through the 'call for sites' process, and together with the SHELAA, meet the PPG requirements for the economic element of the land availability assessment. This reflects the site options provided to the Council as December 2020.
- 3.6. Since the adoption of the Core Strategy in 2012, and the Site Allocations Document in 2018, South Staffordshire District has continued to consistently deliver its own employment land needs including bringing forwards strategic employment land of regional and national significance. This has predominantly been on land at i54, which is likely to continue to be an important strategic

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<sup>2</sup> Planning Practice Guidance, Paragraph: 005 Reference ID: 3-005-20190722

site for the delivery of both District and sub-regional employment land alongside the recent DCO granted permission at West Midlands Interchange.

- 3.7. At the publication of EDNA(1) there were 30 existing employment land sites within South Staffordshire. These were assessed against each other to determine the quality of each site, and thus provide an overview of the quality of all employment land within the District to be used as a benchmark for future requirements. The assessment criteria is set out at paragraph 3.15 of this document.
- 3.8. EDNA(1) identified that within the existing employment sites, **there is a total 105Ha of outstanding land available to be developed**. Of which, 64ha is of the 'best' quality.
- 3.9. Three different methodologies were adopted within EDNA(1) to define the future requirements for employment land (between 2018 to 2038). The first of which uses projected employment levels to determine the quantity of floorspace necessary to accommodate such job generation. The output of this approach indicates that the District has a negligible requirement for approximately 0.5ha of employment land for the emerging plan period. This is as a consequence of the projected decline in manufacturing jobs.
- 3.10. The second method implemented involves the analyses of Gross Value Added (GVA) to project the quantity of employment floorspace required. GVA is a measure of the contribution to the economy by defining the economic output of a given sector. In short, the value is determined as a quantitative assessment of the value of goods / services minus the costs of inputs to produce them. The output of the approach indicates that the District has requirement for approximately 19ha of employment land for the emerging plan period.
- 3.11. The third method used recent historic employment land completions within the District to calculate an average delivery rate per annum. This is then applied to the forthcoming years of the plan period and indicates that the District has requirement for approximately 67ha of employment land for the emerging plan period.
- 3.12. Combining these calculations together, the EDNA(1) proposes 2 'Growth Scenarios'. Each scenario takes a different combination of the 3 previously described methodologies. The EDNA(2) recommends that South Staffordshire plans for Growth Scenario 2 (where GVA will be generated over and above the application of past-based trends). As such, **the Local Plan should plan for the delivery of 86ha of employment land to meet the District's own need**.
- 3.13. To meet this need, EDNA(2) reviewed 25 sites (as identified through the Call for Sites / SHELAA process(es)) with the potential to deliver employment land within the emerging plan period. Of these sites, three were assessed as unsuitable as part of an initial assessment, with the remaining 'potentially suitable' sites then subject to further assessment.
- 3.14. Predominantly these sites are located within the north of the District (within Localities 1, 2 and 3) along and between the A449 and M6 corridors. As such, the sites lie outside of village locations. However, there is a mix of site size options ranging from large(r) strategic areas (up to 297ha) alongside smaller site areas (from 2.6ha).



- 3.15. Regardless, all sites were reviewed in detail in line with Planning Practice Guidance against the same criteria used to assess the existing employment stock in EDNA(1) pertaining to:
- Key constraints / strategic planning considerations – including policy constraints (ie. Green Belt / Flood Zone), site legibility, site access, compatibility with neighbouring uses, impact upon biodiversity.
  - Market attractiveness – site location (ie. distance to strategic road network / distance to other similar industries), quantity of required investment, suitability for growth sectors.
  - Access to workforce / sustainability of development – site location (ie. connectivity to public transport network / distance from main residential areas).
- 3.16. This assessment used a scoring system to ‘rank’ the employment sites by potential quality. The EDNA(2) does not provide explicit recommendations as to which sites should – or should not – be allocated for employment use through the Local Plan as there are other policy constraints and specific requirement unknowns. Nevertheless, it does provide an initial indication as to which sites would be preferable for such use(s) from a strategic planning, market attractiveness and sustainable development perspective.
- 3.17. Of the 22 sites assessed, the EDNA(2) identifies 7 sites of ‘best’ quality employment land. This includes West Midlands Interchange (WMI) which scores significantly higher than other sites. The size of WMI (at 297ha) also provides a significant quantity of employment land which EDNA(2) highlights has the potential to deliver B8 employment land and meet sub-regional needs.
- 3.18. The EDNA identified that South Staffordshire has sufficient (over)supply of developable employment land within the District (circa 105ha) to meet its own employment requirements across the plan period (to 2038). When considered against the two demand scenarios this results in a 38ha oversupply against ‘growth scenario 1- past completions’, and a 19ha oversupply against ‘growth scenario 2 – Past completions and growth GVA’.

### Duty to Cooperate

- 3.19. National guidance requires however that employment land requirements are considered in the context of a ‘best fit’ across the FEMA, and therefore the role that South Staffordshire has in a contributing to meeting wider employment / cross-boundary needs must also be considered through the plan-making process.
- 3.20. Of the other authorities within the South Staffordshire FEMA Cannock Chase District Council are also in the process of preparing their new Local Plan. In February 2021 they consulted on their Preferred Options consultation which indicated that 50ha of employment land will be provided over the plan period to meet Cannock’s employment needs. There is currently no indication that Cannock are unable to meet this need within their administrative boundary.
- 3.21. The Black Country authorities are also preparing their Local Plan with the Black Country Draft Plan (August 2021) confirming that they have a need of 565ha of employment up until the end of their plan period (2039). The Black Country Draft Plan confirms they are only able to deliver 355ha of this leaving a shortfall on 210ha. Their Draft Plan indicates that this unmet need should be exported, as far as possible, to authorities that have a strong existing or potential functional

economic relationship with the Black Country; to be agreed through a Statement of Common Ground.

### Updated Supply of employment land

- 3.22. As set out at Paragraph 3.18, the EDNA identified a supply of employment land of 105ha as at 2018. However with West Midlands Interchange consented through the DCO process this has increased the employment land supply in the District considerably to 340ha, as reflected in Table 1 below. The figure for the available land at WMI reflects the proposed built area minus the area set aside for green infrastructure.

	Site Name	Parish(es)	Site Area (Ha)	Available Land for Employment Development 2018-2038
Strategic Site	Four Ashes Industrial Estate, Four Ashes (inc. Bericote).	Penkridge. Brewood & Coven	72	10.58ha
	Hilton Cross Business Park.	Featherstone	18	4.84ha
	ROF Featherstone.	Featherstone	36	36ha
	West Midlands Interchange.	Penkridge. Brewood & Coven	297	232.5ha (excluding green infrastructure)
	i54, Wobaston Road.	Bilbrook	90.5	6.12ha
	I54 Western Extension	Bilbrook	40	40ha
	Acton Gate.	Dunston	13.7	-
	Acton Plaza.	Dunston	0.8	0.8ha
	Balliol Business Park, Wobaston Road.	Bilbrook	6.6	-
	Coppice Lane, Cheslyn Hay.	Cheslyn Hay	7.3	-
	Dunston Business Village.	Dunston	2.1	-
	Essington Light Industrial Estate, Bognop Road.	Essington	0.8	-
	Hawkins Drive Industrial Estate.	Cheslyn Hay	12	0.25ha
	Hepworth Site, Warstones Road.	Essington	3.8	-
	Heathmill Road Industrial Estate.	Wombourne	19.3	-
	Hilton Main Industrial Estate	Featherstone	7.07	
	Vernon Park	Featherstone	5.7	2.8ha
	Hobnock Road, Essington.	Essington	5.2	5.2ha
	Huntington Industrial Estate.	Huntington	1.1	-
	Kingswood Business Park.	Perton	1.0	-
	Landywood Enterprise Park	Great Wyrley	3.4	-
	Landywood Lane Industrial Estate.	Cheslyn Hay	6.5	-
	Little Business Park, Littleton Drive.	Huntington	2.7	-

Loades plc., Gorsey Lane.	Great Wyrley	1.1	-
Ounsdale Road Industrial Estate.	Wombourne	2	0.9ha
Owens Trading Estate, Wobaston Road.	Bilbrook	7.1	-
Paradise Lane, Slade Heath.	Featherstone	3.1	-
Former Sandvik Site, Brinsford	Featherstone	2.2	-
Smestow Bridge Industrial Estate.	Wombourne	21.1	-
Wolverhampton Business Airport.	Bobbington	1.7	-
Wombourne Enterprise Park.	Wombourne	3.9	-
		<b>TOTAL</b>	<b>340ha</b>

**Table 1:** South Staffordshire Employment stock

## 4. Employment Options & Assessment

- 4.1. Site options provided to the Council through the Call for Sites process and assessed for the EDNA2 provided the Council with a shortlist of 22 sites that were potential options for meeting the District's employment land needs, ranked by quality from a market perspective.
- 4.2. To ensure all relevant factors for site selection are highlighted on a site by site basis, the Council has prepared site-specific proformas for each of the sites assessed. This provides the Council with a consistent record of information under the following topics for each site:
- Sustainability Appraisal Findings.
  - Economic Development Needs Assessment – Part II scoring.
  - Policy area and access to infrastructure.
  - Sequential test.
  - Green Belt harm.
  - Landscape sensitivity.
  - Impact upon historic environment.
  - Known site constraints.
  - Site Opportunities.
  - Summary (including recommendation for allocation).
- 4.3. The approach taken to recording information under each of these topics is set out below.
- 4.4. The Council commissioned Lepus Consulting to undertake a Sustainability Appraisal of all employment site options. This considered a range of secondary data sources to predict key sustainability effects likely to result from new sites against a range of sustainability objectives. Predicted effects within the Sustainability Appraisal fall within the following categories:
- Major Positive
  - Minor Positive
  - Negligible
  - Minor Negative
  - Major Negative
  - Uncertain
- 4.5. Within the site assessment proformas, major positive and major negative effects arising from the post-mitigation site assessments in the 2021 Sustainability Appraisal<sup>3</sup> are highlighted. The Council has used the post mitigation assessments to inform site selection to ensure that major negative effects likely to be mitigable are not considered as barriers to development. The Council has had regard to the full assessment of effects for each site in the Sustainability Appraisal, but has only recorded the major effects in the proformas to ensure the most impactful effects are highlighted to inform site selection.
- 4.6. The Council commissioned Warwick Economics and Development to undertake two-part Economic Development Needs Assessment as set out in paragraphs 3.4 to 3.18. As noted, this

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<sup>3</sup> Table 6.1: Impact matrix of site assessments post-mitigation in the Sustainability Appraisal of the Preferred Options Plan July 2021

provided a site 'score' which ascribed a numerical value as to the quality of the site for employment use relative to the other sites within the District. This scoring is reproduced in the assessment proformas at Appendix A.

- 4.7. Under the policy area and access to infrastructure criteria, the Council has considered where the site is located in relation to existing employment areas and also recorded approximate distances from the centre of each site option to existing key infrastructure via safe and well-lit footway connections (rather than direct as-the-crow-flies distances). The following factors (where present in a broad location) were recorded:
- Nearest train station.
  - Closest regular bus stop identified by Staffordshire County Council in the District or in neighbouring urban areas.
  - Nearest motorway junction, or if more relevant, nearest A Road network.
  - Location of site to existing employment sites – opportunities to create critical mass facilitating infrastructure delivery (this distance was measured 'as-the-crow-flies')
  - Location of the site and relationship to employment uses in the wider area
- 4.8. This information overlaps with some of the information recorded in the Sustainability Appraisal, which considers catchments from many of the above facilities to sites. However, the Council has still chosen to record the above recognising that the Sustainability Appraisal walking catchments do not have regard to on-the-ground walking routes or pedestrian footways. This extra information therefore offers an opportunity to sense check the degree of pedestrian connectivity to infrastructure on a site-by-site basis.
- 4.9. To minimise more sensitive land release, and as part of the Council's wider duty to only release Green Belt in exceptional circumstances, the Council has used sequential test criteria as part of the site assessment process. This criteria has considered whether an employment site option is within:
- the development boundary of an existing settlement,
  - a designated Employment Land Site Allocation (from 2018 SAD, Policy SAD5),
  - a designated employment site (from 2012 Core Strategy, Policy EV1)
  - safeguarded land previously removed from the Green Belt,
  - Open Countryside beyond the Green Belt, or
  - Green Belt.
- 4.10. This has enabled the Council to give weight to any less sensitive (e.g. non-Green Belt) options which could meet a broad location's development needs, ensuring that this is a prominent factor in the site selection process. However, other factors such as landscape sensitivity, the need to retain a site for a certain use or other site-specific constraints may still, on balance, override this issue. It is therefore important to note that a site being outside of the Green Belt does not automatically mean that it will be considered more favourably than Green Belt site options.

- 4.11. National policy and case-law<sup>4</sup> requires that, before concluding exceptional circumstances exist, the Council must give consideration to the nature and extent of harm to the Green Belt and its purposes before considering release of a Green Belt site.
- 4.12. To ensure the Council had sufficient information to make this judgement for each individual development site, a comprehensive Green Belt Study 2019 was jointly prepared with the Black Country local authorities. This categorised the harm that would result from release Green Belt land across the District into the following categories:
- Very High
  - High
  - Moderate-high
  - Moderate
  - Low-moderate
  - Low
  - Very low
- 4.13. This harm rating has been consistently recorded for each site suggestion in the relevant section of the proforma. Where a mixture of harm ratings existed within a site boundary, the harm rating across the majority of the site was used.
- 4.14. Due to the District's spatial characteristics, the vast majority of site suggestions considered by the Council to accommodate new growth are in greenfield countryside locations. To ensure the site selection considers this issue, the Council has prepared a jointly commissioned Landscape Sensitivity Assessment 2019 with the Black Country authorities.
- 4.15. This study examines the landscape and visual sensitivities within individual assessment areas, establishing the sensitivity of an area of landscape to employment and housing development. This categorises the landscape surrounding existing settlements across the District into the following categories of sensitivity:
- Very high
  - High
  - Moderate
  - Low
  - Very low
- 4.16. This sensitivity rating was consistently recorded for each site suggestion in the relevant section of the proforma. Where a mixture of landscape sensitivity ratings existed within a site boundary, the sensitivity rating across the majority of the site was used.
- 4.17. To ensure the impact on the historic environment of sites coming forward is consistently and robustly assessed, a Historic Environment Site Assessment has been prepared by an appropriately qualified consultant to inform the site selection process. Stage 1 of this work has been prepared

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<sup>4</sup> Calverton Parish Council v Greater Nottingham Councils & others (2015)

in consultation with Historic England to ensure the findings of the study are robust and will have full regard to all relevant Historic England guidance in its methodology.

- 4.18. The Historic Environment Site Assessment assesses the potential harm to the historic environment arising from site options. For both direct and indirect potential heritage harm, the assessment draws one of the following conclusions using a RAG score approach:
- Green – no concerns identified, on current evidence, although archaeological mitigation measures may be required.
  - Amber – no significant effects which cannot be mitigated are at present predicted.
  - Red – significant effects which cannot be mitigated are at present predicted.
- 4.19. The Council has recorded these conclusions under the relevant section of the site assessment proforma. Notwithstanding the initial assessment of sites undertaken in Stage 1 of the Historic Environment Site Assessment, a more detailed targeted Stage 2 assessment of each of the Council's proposed allocations will be undertaken prior to submission of the Local Plan Review. This will allow the effects on the historic environment to be more fully considered before final confirmation of any allocations, whilst also allowing detailed mitigation proposals to be identified.
- 4.20. In addition to the evidence base listed above, a number of other factors may influence how suitable a site is to accommodate a planned level of growth for that area. To this end, the Council has considered a variety of other site constraints through the site survey process that may shape or prevent the delivery of employment land on a site.
- 4.21. Most of these factors have been identified internally by the Council through the site survey process and include the following, which are recorded (where relevant) within the site assessment proforma:
- Potential access issues, including where development to affect important vegetation (e.g. hedgerows, tree belts, TPOs).
  - Potential for loss of current important land use (e.g. open space, other site uses, community facilities).
  - Natural environment constraints (e.g. contains or is adjacent to designated or non-designated wildlife sites, AONB, SAC).
  - Identified areas of high or very high habitat distinctiveness in the 2020 South Staffordshire District Nature Recovery Network (NRN) Mapping, which this document indicates should be a priority for protection and expansion within the local plan
  - Areas of Flood Zones 2/3 that may constrain site layout.
  - Coal mining risk areas and mineral safeguarding areas
  - Other potential physical constraints (e.g. topography, adjacent bad neighbour uses, contamination risks etc.).
- 4.22. In addition to the above, the Council has also sought the initial views of the Highways Authority and on each site, to identify which sites may raise concerns if allocated. The relevant highways comment for each site is recorded under this section of the site assessment proforma.

- 4.23. A substantial number of site options overlap with areas of surface water flood risk. This has led to the individual site comments being sought from the Lead Local Flood Authority (LLFA), which are set out in each site assessment. These ensure site selection is informed by an initial view from the LLFA as to whether any surface water flood risk could likely to mitigated through scheme design.
- 4.24. Whilst this criterion will not apply to many sites to any significant degree, some of the site opportunities and design benefits below are particularly relevant to specific sites. Such opportunities include:
- Connections into adjacent active travel or green infrastructure networks.
  - Extent to which site is contained by existing natural boundaries.
  - Opportunity to redevelop previously developed land.
  - Opportunities for densification to, or improvement of, existing employment site(s).
  - Market demand for the site.
  - Accessibility of the site to workforce.
  - Any previous planning permissions with approval within the last 5 years.
- 4.25. These are noted in the proforma where relevant<sup>5</sup>, so that they can inform the relevant merits of different growth options and potential policy requirements on specific sites.
- 4.26. The proforma then includes a summary box setting out if the site is proposed for allocation. This picks out the key merits of the site as well as key constraints before setting out if the site is proposed for allocation. It is important to note that these summaries of key points are not considered in isolation when selecting sites, but are simply designed to record some of the more potentially significant factors recorded in the site assessment process

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<sup>5</sup> If constraint / opportunity is not referenced for a site, it is presumed not to exist.



## 5. Conclusion

- 5.1. This paper has summarised the evidence base available to officers facilitating the assessment of potential employment land opportunities as part of the Local Plan preparation process. It informs the employment policies and choice of allocations to include in the Preferred Options Plan.
- 5.2. The Council's employment target for the period 2018-38, based on the EDNA1 findings, is 86ha. However, across wider South Staffordshire FEMA, whilst Cannock Chase have indicated that they are planning to meet their own needs through their emerging Local Plan, the Black Country have indicated a shortfall of 210ha.

### Site Proposed for Allocation

- 5.3. Once all potential site options were assessed across the District, the Council then had to consider which sites to allocate. The process involved considering a balance of top-down strategic factors (e.g evidenced employment needs) and bottom-up site-specific factors (assessed in Appendix A). The site selection process combines these top-down and bottom-up factors to arrive at a decision as to which site(s) should be selected.
- 5.4. Subsequent to the EDNA findings, the supply of employment land in South Staffordshire has increased significantly due to the recent consenting of a Strategic Rail Freight Interchange, known as West Midlands Interchange (WMI), at Four Ashes. Given that WMI already has consent through the Development Consent Order (DCO) process, the unmet needs across the FEMA and because the site performed well through the assessment process (Appendix A), it is proposed the exceptional circumstances to release the site from the Green Belt exist. As such, **it is proposed that WMI is allocated and removed from the Green Belt** (through Policy SA6 - Employment allocation - West Midlands Interchange).
- 5.5. There is currently a lack of certainty concerning the quantum of employment land needs required to contribute to the Functional Economic Market Area. Nevertheless this paper does provide an indication that South Staffordshire has enough land (supply = circa 340ha) of the appropriate quality to deliver its own employment land needs for the District (86ha). It has also highlighted the expectation that there will also be a significant surplus (circa 254ha) of employment land to provide for redistribution to neighboring authorities in our wider FEMA where there is evidence of an undersupply agreed through the Duty to Cooperate arrangements in place. In principle, South Staffordshire Council is willing to redistribute any oversupply to neighboring authorities within the FEMA, namely the Black Country. The exact amount of the oversupply to be attributed to unmet needs of the Black Country will need to be agreed through a Statement of Common Ground with the Black Country. This will be contingent on the amount of employment land required to meet South Staffordshire's needs, including ensuring sufficient plan flexibility.
- 5.6. Given this, at the current time, there is no justification for further land release from the Green Belt or Open Countryside of sites assessed as part of this process.

## Next Steps

- 5.7. As the South Staffordshire EDNA was undertaken in 2017/18 it is our intention to prepare an updated EDNA prior to our publication consultation to review whether the demand for employment land has changed, particularly in light of Brexit and Covid-19. This update will ensure that our employment evidence is up to date for submission of the Plan and will inform how much of the District's oversupply of employment land is available for redistribution to other local authorities in the surrounding area.
- 5.8. Given the scale of the oversupply of employment land in South Staffordshire, it is not expected that a review of the EDNA will change the current position that South Staffordshire has sufficient supply of employment land to meet our own needs, as well as surplus employment land towards unmet needs in the wider FEMA. However, by fully examining all reasonable employment site options this paper offers a basis for considering if further allocations are required once the review of the EDNA is complete; and once clarity emerges on how needs across the wider South Staffordshire FEMA are being met following agreement (through a Statement of Common Ground) with neighboring authorities.

## **Appendix A – Employment Site Assessment Proformas**

Site reference	E04	Address	Land around Dunston Business Village
Site size (ha)	3.6ha available	Proposed use	B1 – Office.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	56 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Penkridge Parish and is in open countryside adjacent (west and north) of Dunston Business Village. The existing properties on site are a mix of converted agricultural buildings and log cabin type buildings falling within B1(a) office use class. The site adjoining the current development has the potential to provide further employment space or can be used to improve amenities such as parking.</p> <ul style="list-style-type: none"> <li>• Hourly bus service runs along A449.</li> <li>• Nearest railway station is Penkridge at 2.7km.</li> <li>• Site is on an A-road and is 1.9km from J13, M6.</li> </ul>		
Sequential test	Site is designated Open Countryside which is sequentially preferable to other Green Belt site options.		
Green Belt harm	The site is entirely located within the Open Countryside.		
Landscape sensitivity	Moderate.		
Impact on historic environment	<p>HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.</p>		
Known site constraints	<ul style="list-style-type: none"> <li>• Any extension will be into open countryside which would result in a loss of green space, however there is scope for a small extension(s) to the west of the current site that would see limited impact on the greenfield loss, while providing an extension to a well operating business centre.</li> <li>• The site is located just over 1.7km from J13, M6 and benefits from direct access onto the A449.</li> <li>• Adjacent established employment location and so benefits from good accessibility / connections particularly to / from Penkridge (20 minute walk) and Stafford (40 minute walk) although footway could be more 'formalised' in areas.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Site east of the A449 partially within Mineral Safeguarding Area.</li> <li>• Limited key constraints associated with this site other than limited loss of agricultural land, some of which may be of Grade 2 classification.</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Ok in principle - extension to existing site is feasible, A449 may need widening slightly but nothing insurmountable</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Although proposed site extension covers entirely greenfield land, the proposed site boundary appears to be well bounded and contained especially to the north and east by Swan Lane, existing residential dwelling / A449. The west and south of the site is less clearly defined, although western extension covers greenfield area which does not appear to be in agricultural use (agricultural field boundary would act as boundary marker). Field to the north also does not appear to be in agricultural use. Field to the south is in agricultural use and would be able to provide site definition with what appears to be strong hedgerow. The site benefits from being regular in shape.</li> <li>• The site is a natural expansion to the existing business village and further development of the already highly occupied site would be well received. It is understood the site owner has expressed a desire to see the site expanded due to the high levels of demand for units.</li> <li>• The site is in a highly accessible location as noted by previous factors.</li> <li>• Parcel of site west of existing employment area has been part of wider approved applications – 16/00497/FUL and 17/00250/FUL.</li> </ul>
Proposed for allocation?	The site performs relatively well and has a clear advantage of being a logical extension to an existing non-strategic employment site and is not in the Green Belt. However given that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.

Site reference	E15a	Address	Hobnock Road, Essington.
Site size (ha)	17.5	Proposed use	B1 – Office or Light Industrial. B2 - General Industrial. B8 – Storage and Distribution
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	63 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Essington Parish and is accessed via Hobnock Road. It is enclosed by the M6 to the west, Hobnock Road to the north and Bursnips Road to the east. The site is mostly cleared with a fenced perimeter and is within a short proximity to the M6 / M54 although the transport route may need to be assessed as the B4156 (Hobnock Road) is not particularly suited to HGV's. Northern end of site is designated as Hobnock Road Strategic Employment Site. The next nearest employment site is Essington Light Industrial Estate, Bognop Road, Strategic Employment Site located approximately 0.81km east.</p> <ul style="list-style-type: none"> <li>• An hourly or better bus service operates along Hobnock Road.</li> <li>• The nearest railway station is Bloxwich North located approx. 2.9km to the south east and outside of SSDC administrative area.</li> <li>• The A462 runs adjacent the eastern boundary of the site, whilst the nearest motorway junction is J11, M6 (approx. 3.0km north), or J1, M54 (approx. 4.0km west).</li> </ul>		
Sequential test	<p>The site is in the Green Belt, however approximately 5.2ha of the site benefits from a Certificate of Lawfulness for B2 use and is Previously Developed Land. Therefore, whilst this element of the site is sequentially preferable to Green Belt site options, this isn't considered the case for the remainder of the site.</p>		
Green Belt harm	High.		
Landscape sensitivity	Low.		
Impact on historic environment	<p>HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.</p>		
Known site constraints	<ul style="list-style-type: none"> <li>• Previous quarrying use of the site is a potential constraint to development.</li> </ul>		

	<ul style="list-style-type: none"> <li>Nearby residential dwellings and traveller site (east of site) are important amenity considerations.</li> <li>Essington Wood Ancient Woodland located immediately to the north east of the site.</li> <li>Eastern half of the site located within Development High Risk area as identified by the Coal Authority.</li> <li>The site is located within a Mineral Safeguarding Area, with the majority of site located within an area of Brick Clay.</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – at planning stage, rationalise ground levels or leave space for surface water in site layout.</p> <p><u>County Highways assessment</u> Ok in principle subject to being limited to B8 use</p>
Site opportunities	<ul style="list-style-type: none"> <li>5.2Ha of site has Certificate of Lawfulness for B2 use.</li> <li>Public transport connections at Bursnips Road with links to Essington, Cannock, Cheslyn Hay and Wolverhampton.</li> <li>Moreover, despite being located within the Green Belt, the site has visual remnants of historic quarrying use(s) and whilst the site isn't located immediately adjacent any development boundary it is very well contained by the road network that entirely bounds the site. On the opposite side of J10a, M6 (south east of site along Hobnock Road), SHELAA Site 153 is coming forward as residential development, visually extending the developed area of Essington close to the motorway.</li> </ul>
Proposed for allocation?	<p>The site performs relatively well compared to most other site options, and has a clear advantage of being of low landscape sensitivity (in part due to previous quarrying use) with part of the site acceptable in principle for B2 use due to Certificate of Lawfulness consent. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. The site's location in a brick clay mineral safeguarding area is a significant constraint, given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E30	Address	Land south of J13, M6.
Site size (ha)	82.69	Proposed use	B2 – General Industrial. B8 – Storage & Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	58 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is largely located within Dunston Parish, although the north western parcel of the site is located within Coppenhall Parish. This site is of agricultural use, located in the open countryside adjacent to junction 13, M6 and Dunston village in close proximity at approx. 1.1km south of the site. The wider 70 ha site is intersected by the West Coast Mainline.</p> <p>Site is located on the opposite side of the M6 from Acton Gate Employment Site.</p> <ul style="list-style-type: none"> <li>• An hourly or better bus service operates along A449 with bus stop located within boundary of site.</li> <li>• The nearest railway station is Penkridge railway station located 4.3km south of the site.</li> <li>• The site is located immediately adjacent J13, M6 and A449.</li> </ul>		
Sequential test	Site is designated Open Countryside which is sequentially preferable to other Green Belt site options.		
Green Belt harm	The site is entirely located within the Open Countryside.		
Landscape sensitivity	<p>47.84ha – low – moderate (east of WCML).</p> <p>23.88ha – moderate (west of WCML).</p>		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>• The site is intersected by the West Coast Mainline which could impede further expansion of the site.</li> <li>• Western part of the site has no clear route of access and is partly located within Flood Zone 3</li> <li>• 6 Public Right of Ways intersect the site.</li> <li>• Roughly eastern two-thirds of site is located with Mineral Safeguarding Area.</li> </ul>		



	<ul style="list-style-type: none"> <li>Dunston village to the south east includes residential environment which amenity would need to be considered as part of scheme design.</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse.</p> <p><u>County Highways assessment</u> Ok in principle subject to significant highways works and Highways England consultation</p>
Site opportunities	<ul style="list-style-type: none"> <li>Six PROWs intersect the site.</li> <li>Site is well contained by the M6 to the north and east of the site and School Lane to the south. The western part of the site appears well contained by field lines and tree / vegetation lines.</li> <li>Previously Developed Land as parcel of site immediately south of J13 is currently a farm which includes a number of small independent retailers and industrial operations.</li> <li>The proximity of the site to J13, M6 and the Argos distribution centre opposite the same junction makes the site attractive to the logistics and distribution sector.</li> <li>Potential direct access to the motorway network and A449 makes the site extremely accessible to workforce.</li> </ul>
Proposed for allocation?	<p>The site performs relatively well and has a clear advantage for distribution/logistics of being close to the M6 (J13) and is not in the Green Belt. However the County highways team have expressed some initial concerns relating to site access. Given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E31	Address	Land east of Paradise Lane, Slade Heath
Site size (ha)	2.61	Proposed use	B2 – General Industrial B8 – Storage or Distribution
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	54 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>This site is located within Featherstone Parish and is designated Green Belt. It is currently used for the storage of HGV trailers with access directly from New Road or alternatively Paradise Lane.</p> <p>The site is on the other side of Paradise Lane adjacent to Paradise Lane Employment Site. The site is also located at the northern end of Paradise Lane which at its southern end is ROF Featherstone Strategic Employment Site (0.8km distance).</p> <ul style="list-style-type: none"> <li>• Nearest bus stop served by hourly or better bus service is located 1.3km west at the edge of Coven.</li> <li>• No railway station in reasonable proximity to the site, however proposed Brinsford Station may come forward in future approximately 1.1km south of the site.</li> <li>• Nearest A-Road is A449 located 1.1km west of site. The nearest motorway junction is J2, M54 located 2.3km south west of site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Moderate – high.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• The site is adjacent to a residential dwelling (north east of site) and could create residential amenity issues.</li> </ul>		

	<ul style="list-style-type: none"> <li>• New Road provides good access from both a pedestrian and vehicular access and links the site directly to Featherstone.</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Initial concerns due to impacts on A460</p>
Site opportunities	<ul style="list-style-type: none"> <li>• The prison to the south and employment site to the west has had an urbanising influence in the area.</li> <li>• The development of this site for employment use would be beneficial as a natural extension to the Paradise Lane industrial area and prison to the south. Perception-wise these developments could potentially deter residential development on the land and further bring forward the case for employment development.</li> <li>• Site is partially PDL with HGV storage to the eastern part of the site, a residential dwelling in the north west corner, and office building with hardstanding in the western part.</li> <li>• The site is well contained by existing infrastructure and landscape. The north is bounded by New Road, the west by Paradise Lane and the south by HMP Brinsford. The eastern end of the site is bounded by relatively mature trees although 0.2km beyond that (should the site expand, lies Oaks Drive that could act as a further site delineation).</li> <li>• This site is well located in an area that is established in terms of commercial activity. With the site is in close proximity to the A449/A460, the strategic road network, the prison and other commercial activities.</li> <li>• The nearest means of public transport access would be located at the prison, which while not ideal in relation to the proximity it highlights that there is a service within the surrounding area.</li> </ul>
Proposed for allocation?	<p>The site performs relatively well and has the advantage of being very well contained and close to other commercial activity. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E32	Address	Land east of Four Ashes (proposed extension).
Site size (ha)	9.96	Proposed use	B1 – Office / Light Industrial. B2 – General Industrial B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	61 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Brewood and Coven Parish, adjacent to the south eastern boundary of Four Ashes Industrial Estate, between the existing employment land (to the west) and the sewage works / VEOLIA energy recovery facility (to the east).</p> <ul style="list-style-type: none"> <li>• Site is immediately adjacent to Four Ashes Strategic Employment Site.</li> <li>• Nearest bus stop served by service with frequency of at least one per hour is located 1.1km west of site on A449.</li> <li>• Nearest A-road junction is 1.0km west of site (A449 / Station Drive / Four Ashes Road crossroads).</li> <li>• Nearest motorway junction is 3.4km north east of site (J12, M6).</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>• Adjacent to the south west boundary of the site is Four Ashes Site of Biological Importance although this runs along the southern boundary of the wider strategic employment site. The northern boundary of the site abuts the Canal Conservation Area and Calf Heath Bridge Biodiversity Alert Site. Both these designations run adjacent to the eastern boundary of the existing employment site.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Deepmore Lane is considered unsuitable for access provision. Potential new access route may be compromised by sustainable urban drainage pool for VEOLIA facility.</li> <li>• Potential issues with land remediation / abnormal development costs due to previous quarrying practices prior to agricultural use.</li> <li>• Majority of site (approximately southern two-thirds) is located within Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Initial concerns with access to the site</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Canal towpath runs adjacent to the north of the site to provide cycle connectivity opportunities.</li> <li>• Site is well bounded to the west by existing Four Ashes employment area and to the north by the Staffordshire and Worcestershire Canal. The eastern and southern boundaries are less well defined. The eastern boundary is largely defined by a narrow country lane – Deepmore Lane, and beyond that lies the sewage works. Although the northern end of the eastern boundary is undefined by landscape features. The southern boundary uses an existing hedgerow / tree-line, but again, beyond that there is an open space that extends beyond this by approximately 130m to Saredon Brook.</li> <li>• The site would function as an extension to existing strategic employment site.</li> <li>• The location of the site has been identified as being attractive to the market by the EDNA due to its proximity to existing established employment uses in close proximity. This spatial context also means that access to workforce should raise no issues.</li> </ul>
Proposed for allocation?	<p>The site performs relatively well and has the advantage of potentially forming an extension to an existing strategic employment site. However, there are some initial concerns about the site's deliverability, particularly relating to rights of access through the adjacent VEOLIA facility. The site is also predicted to cause major negative effects in the Sustainability Appraisal, due to being in one of the more harmful Green Belt areas within the District Given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E33	Address	West Midlands Interchange
Site size (ha)	297	Proposed use	B8 – Storage or Distribution .
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	77 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	<p>The majority of the site is located within the Green Belt in Penkridge Parish, although the south east portion of the site is located within Hatherton Parish whilst the south west corner is located within Brewood and Coven Parish. This site was granted planning approval by the Secretary of State for Transport on 4 May 2020 as Nationally Significant Infrastructure Project Development Consent Order Regime. Unlike other potential logistics sites within the District, the site will deliver a rail link to support the sustainable development of the site.</p> <p>The site consists of the vast majority of the area between A5 (north), M6 (east), Straight Mile and Four Ashes (south), and A449 (west). The south western part of the site wraps around the northern half of Four Ashes Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• Nearest bus stop served by service with frequency of at least one per hour is located adjacent the western boundary of site along A449.</li> <li>• Penkridge railway station provides the closest passenger service.</li> <li>• Both the Gravelly Way / Crateford Lane / A449 crossroads and A5 / A449 roundabout junction are adjacent the site.</li> <li>• Nearest motorway junction is adjacent the north east boundary of site as J12, M6.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location. However, it does benefit from a consent through the DCO process and therefore the suitability of B8 logistics in this location has been accepted in principle.		
Green Belt harm	Moderate – High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		

Known site constraints	<ul style="list-style-type: none"> <li>• Site of Biological Importance located adjacent to the north east corner of the site whilst Canal Conservation Area runs directly through the site north to south.</li> <li>• Majority of the western and northern end of the site are located within a Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.</p> <p><u>County Highways assessment</u> Ok in principle - site has previous consent through DCO process with associated modelling and mitigation</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Canal towpath runs through the site to provide cycle connectivity opportunities.</li> <li>• The site has excellent connections to both the A5 and A449 which provide well-lit pedestrian footpaths in all directions away from the site.</li> <li>• Public Right of Way (Penkridge 29) exists in the north west corner of the site.</li> <li>• The site is well bounded by the A5 / Calf Heath Reservoir (north), A449 (west) and largely Four Ashes Employment Site / Straight Mile (south). Less landscape definition for the eastern boundary which follows tree/hedge-line although beyond that by approximately 130 – 140m is the M6.</li> <li>• Site is extremely attractive to the market due to its location adjacent existing successful employment site and strategic road network. As evidenced by the granting of Development Consent Order for the site in May 2020.</li> <li>• Access to workforce is not anticipated to be an issue as the volume and scale of the scheme should generate enough demand for infrastructure to ensure prime connectivity of the site to transport infrastructure.</li> </ul>
Proposed for allocation?	<p>The principle of the development is already established through the DCO process and the site scores significantly better than other site options through the EDNA2 and this assessment. Major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District, however the principle of substantial development has already been established in this location. The site can clearly make a significant contribution towards any unmet needs of the wider FEMA and could do so in a more sustainable manner than alternative site options (due to the proposed rail link). Given that the principle of B8 development is established, it is considered that the exceptional circumstances the site from the Green Belt exist and therefore the site is proposed for allocation.</p>

Site reference	E37	Address	Land between ROF Featherstone and A449.
Site size (ha)	63.9	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	57 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>Site is a large area of land located in Brewood and Coven Parish to the west of ROF Featherstone and West Coast Mainline. It is close to the built-up area of Wolverhampton to the south and covers the slither of undeveloped land up to New Road in the north and A449 / Stafford Road west (excluding existing buildings at Coven Heath and Cross Green).</p> <p>The northern end of the site is immediately west of Paradise Lane Employment Site, whilst the southern end of the site lies adjacent the proposed ROF Featherstone Employment Site Extension.</p> <p>At its shortest point, the site is located approximately 0.15km west of the existing ROF Featherstone Strategic Employment Site and approximately 0.2km west of Featherstone Development Boundary.</p> <ul style="list-style-type: none"> <li>• The site is located adjacent A449 for part of its western boundary which hosts an hourly or better bus service.</li> <li>• There is currently no rail station within an appropriate distance of the site, however there are proposals to deliver a Strategic Park and Ride– Brinsford Parkway.</li> <li>• The A449 is located adjacent the western boundary of the site whilst J2, M54 is located approximately 0.5km south.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	<p>Northern half of site – High.</p> <p>Southern half of the site (56.5ha) – very high.</p>		
Landscape sensitivity	Moderate.		



Impact on historic environment	<p>HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.</p>
Known site constraints	<ul style="list-style-type: none"> <li>• Central 'belt' of the site located within Flood Zones 2 and 3.</li> <li>• Barriers to site acting as effective extension to ROF Featherstone due to WCML separating the sites.</li> <li>• Southern third of site located within Mineral Safeguarding Area.</li> <li>• Canal Conservation Area is located adjacent site along the north west boundary.</li> </ul> <p><u>LLFA comments</u>  Northern part of site: mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.</p> <p>Southern part of site: mitigable concerns – at planning stage, rationalise ground levels or leave space for surface water in site layout.</p> <p><u>County Highways assessment</u>  Ok in principle - subject to Highways England consultation and avoidance of discharging employment traffic onto Cat &amp; Kittens Lane.</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Canal towpath located adjacent part of western boundary of site to potentially provide cycle connectivity opportunity.</li> <li>• Brewood and Coven 0.915a and b Public Right of Way located adjacent northwest boundary of site.</li> <li>• The site is extremely well bounded by West Coast Mainline on its eastern side. The northern boundary of site is also strongly contained by New Road, Old Stafford Road and Cross Green hamlet. The western boundary is less strength in its definition and largely follows the canal and other existing built infrastructure along this length. The Stafford Road / A449 provides a stronger containment boundary for approximately 300m. The southern boundary has a strong definition as it abuts the vegetated area acting as a bugger to the M54 J2 eastbound slip road.</li> <li>• Site promotor appears to be targeting residential development and employment land is a secondary / ancillary option following a residential-led scheme.</li> <li>• Site has previously been marketed for employment use but has been unsuccessful in coming forward due to viability issues / infrastructure costs – overcome through mixed-use residential-led scheme which is most attractive to the market.</li> <li>• Potential supply-chain opportunities with i54 occupiers.</li> <li>• Site is readily available from Stafford Lane and due to proximity of Wolverhampton / West Midlands conurbation access to workforce is not considered an issue.</li> </ul>

Proposed for allocation?	The site performs relatively well and has the advantage of potentially forming an extension to ROF Strategic Employment Site. However, the site is being promoted for residential led mixed use development and is proposed for a housing allocation through the Local Plan. Given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.
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Site reference	E38	Address	Land south of Moseley Road.
Site size (ha)	21.95	Proposed use	B1 – Office or Light Industrial.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	57 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is located in Essington Ward immediately south of Hilton Cross Strategic Employment Site and Moseley Road. It is sandwiched between the A460 / Cannock Road and District Boundary with a handful of residential dwellings to the south. It is currently undeveloped land except for a small parcel of land operating as a caravan / motorhome sales business (at September 2020). Beyond Hilton Cross, both Hilton Main Industrial Estate and Vernon Park Strategic Employment Site are located adjacent from the site across the A460 / Cannock Road, Moseley Road and Bognop Road roundabout junction.</p> <ul style="list-style-type: none"> <li>• Bus stop with hourly or better service located adjacent the site along A460 / Cannock Road.</li> <li>• The nearest motorway junction is J1, M4 located 0.8km north of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Very high.		
Landscape sensitivity	Moderate.		
Impact on historic environment	<p>HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.</p>		
Known site constraints	<ul style="list-style-type: none"> <li>• Pylons intersect the site at its north east corner with two transmission towers located between 30 and 100 meters north of the existing sales area.</li> <li>• EDNA2 notes the sloping topography may limit the extent of any development.</li> <li>• Potential conflict with residential amenity towards the south east corner of the site.</li> <li>• (Woods north of) Westcroft Biodiversity Alert Site designation located within the site covering approximately 35,400m<sup>2</sup>.</li> </ul>		

	<ul style="list-style-type: none"> <li>• A460 / Cannock Road provides site with immediate access to well-lit pedestrian footway.</li> <li>• Entire site is located within Mineral Safeguarding Area.</li> <li>• TPOs situated in an area to the North East of site</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Initial concerns due to impacts on A460 to north of site.</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Bridleway / Byway runs along southern boundary of site facilitating cycle connectivity. This is also Essington 31 Public Right of Way.</li> <li>• The site is well contained on its eastern boundary by the A460 Cannock Road, it is less well defined elsewhere. The north of the site is bounded by Moseley Road (a narrow country lane) beyond that is largely open fields, whilst the southern boundary is largely demarcated by the narrow track acting as a PROW. A small section of this boundary abuts a residential dwelling and its curtilage. The western boundary is defined by wooded area providing a relatively strong landscape boundary.</li> <li>• A small area of the site is brownfield. Approximately 3,500m<sup>2</sup> which is existing small business operation.</li> <li>• Due to the site's location in close proximity to the strategic road network and existing successful employment sites, the site is considered to be attractive to the market. Coupling these reasons with the proximity of the site to Wolverhampton, the site is also considered easily accessible to the workforce.</li> <li>• EDNA2 noted that access and infrastructure routes would need to be improved to facilitate larger vehicles.</li> </ul>
Proposed for allocation?	<p>The site performs relatively well and has the advantage of being located close to Hilton Cross Strategic Employment Site. However, major negative effects are predicted in the Sustainability Appraisal due to the site being in one of the more harmful Green Belt areas within the District and some initial concerns have been expressed by Staffordshire County Council highways team regarding its potential impact on the A460. Given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E41	Address	Land north of Bognop Road.
Site size (ha)	23.7	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	60 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The north of the site is located within Hilton Parish whilst the southern part of the site is located within Essington Parish. It is immediately east of Vernon Park and Hilton Main Industrial Estate. The majority of the eastern boundary of the site abuts these employment sites directly – excluding the south east corner. The site is split more or less equally in an east-west direction between Featherstone and Shareshill Ward in the north and Essington Ward in the south.</p> <ul style="list-style-type: none"> <li>• Nearest bus stop which hosts an hourly or better bus service is located approximately 0.3km west of the site along A460 Cannock Road.</li> <li>• Although located adjacent J1, M54, there is a 1.0km travel distance to the access the junction, and approximately 0.2km east of A460 / Cannock Road.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location. Whilst it is located at the site of a former quarry, and therefore is not particularly visually attractive, the site is not considered to meet the definition of Previously Developed Land.		
Green Belt harm	Western half of the site (30.3ha) – high. Eastern half of the site – very high harm.		
Landscape sensitivity	Low.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• The site has historically been used as a quarry and now includes woodland and pools so site will incur remediation costs.</li> </ul>		

	<ul style="list-style-type: none"> <li>• EDNA2 identifies listed windmill and monument which could act as barrier to development.</li> <li>• There is no clear and obvious pedestrian direct access to the site as Bognop Road has no footpaths or lighting.</li> <li>• Entire site located within a Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – at planning stage, rationalise ground levels or leave space for SW in site layout.</p> <p><u>County Highways assessment</u> Initial concerns due to impacts on A460</p>
Site opportunities	<ul style="list-style-type: none"> <li>• The terminus of Essington 2 Public Right of Way joins Bognop Road towards the south eastern corner of the site.</li> <li>• The site is strongly contained at its north and west peripheries by the M54 and existing employment areas respectively. Bognop Road provides reasonable definition to the southern boundary, and whilst the eastern boundary is presently defined by a narrow private county track that leads from Bognop Road to an existing country sports facility, beyond this at the northern half of the site boundary exist a substantial quantity of pools which act as natural protection. However the southern half is only protected by a narrow tree buffer to the wider agricultural land beyond.</li> <li>• EDNA2 identified this site has holding potential for Vernon Park expansion with access through said employment area.</li> <li>• Due to its scale, the site is attractive to the market subject to ground conditions and remediation costs upon viability.</li> <li>• Site is well connected to existing strategic transport network and has direct access to Wolverhampton to source workforce.</li> </ul>
Proposed for development	<p>The site performs relatively well and has the advantage of being a former quarry so from a landscape sensitivity perspective development the impact of developing the site would be limited. However, major negative effects are predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District, and there are concerns about the remediation costs of developing the former quarry, as well as initial highway concerns. Given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E42	Address	Former Severn Trent works, Wedges Mills.
Site size (ha)	6.7	Proposed use	B1 – Office or Light Industrial.  B2 – General Industrial.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	Th site was deemed unsuitable in the EDNA2		
Policy area and access to infrastructure	<p>The site is a former sewage works and is located in Saredon Parish although an element of the northern part of the site is located across the District Boundary. The majority of the site (south) located within SSDC, whilst a section of the northern part is located within Cannock Chase DC administrative area. The site lies 'behind' the existing retail / industrial units located on the south side of A5 Watling Street and the residential properties on the east side of A4601 Wolverhampton Road. The parcel of the site within CCDC control is marked as not available through their Employment Land Availability Assessment 2018.</p> <ul style="list-style-type: none"> <li>• Nearest bus stop which host an hourly or better bus service is located approx. 1.7km south east of the site along Walkmill Lane.</li> <li>• The nearest railway station is located approx. 3.1km north east of the site at Cannock. The nearest railway station within SSDC administrative area is Landywood located approx. 4.8km south east of the site.</li> <li>• The site is set-back from both the A5 Cannock Road and A4601 Wolverhampton Road with no clear point(s) of access. The nearest motorway junction is located approx. 1.3km south of the site at Junction T7, M6 Toll. The nearest non-toll connection is J11, M6 located approx. 2.1km south east.</li> </ul>		
Sequential test	The site is a Previously Developed Land site in the Green Belt.		
Green Belt harm	High.		
Landscape sensitivity	Low – moderate.		

Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.
Known site constraints	<ul style="list-style-type: none"> <li>• The site is a former sewage works which would require remediation and impinge upon viability.</li> <li>• No clear and obvious access to the site. EDNA2 identified proposed access along narrow driveway from Wolverhampton Road adjacent residential dwellings or formulated through newly constructed industrial area.</li> <li>• Central portion of the of the site is located within Flood Zones 2 and 3.</li> <li>• No direct access to the site from an illuminated footway.</li> <li>• Site is not particularly attractive to the market due to being set back from the highway.</li> <li>• Majority of the site is within an area of high habitat distinctiveness, which the NRN mapping indicates should be avoided for development</li> <li>• Site is located within a Brick Clay Mineral Safeguarding Area.</li> <li>• Clusters of TPOs along the Western boundary of site.</li> </ul> <p><u>LLFA comments</u></p> <p>Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate possible watercourse.</p> <p><u>County Highways assessment</u></p> <p>Significant highways concerns due to access restraints</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Due to its location behind existing industrial buildings, the site is strongly bounded on its north and east peripheries. The strength of the southern site boundary is weak and follows the existing field pattern / tree line around the old sewage works. Beyond there is no landscape protection due to the open field nature. The western boundary has slightly stronger constraints, although the site boundary is currently the tree line around the old sewage works, there is a run of residential dwellings approx. 75-100m further out.</li> <li>• Local supply of workforce is expected to be strong due to be located on the edge of Cannock.</li> </ul>
Proposed for allocation	The site was considered unsuitable in the EDNA2 and has a considerable number of significant constraints including concerns around flooding, highly distinctive habitat areas within the site, viability, access, and the fact it is in a brick clay mineral safeguarding area. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.



Site reference	E43	Address	Land at J11 M6, Hilton Park.
Site size (ha)	89.2	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	53 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is located mostly within Shareshill Parish, with the northern tip of the site located within Saredon Parish. The site is immediately south east adjacent J11, M6. The proposed M54 / M6 link road runs through the site. The nearest allocated employment site is Hepworth Employment Site located approx. 0.75km east of the site.</p> <ul style="list-style-type: none"> <li>• Nearest bus stop which host an hourly or better bus service is located adjacent the western boundary of the site along the A460.</li> <li>• The site is adjacent both the A460 and J11, M6.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Moderate.		
Impact on historic environment	<p>HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.</p>		
Known site constraints	<ul style="list-style-type: none"> <li>• New M54 / M6 link road cuts through the site and will act as barrier to eastern half development. Not aided by Hilton Lane being unsuitable for HGV access and direct access to link road considered problematic.</li> <li>• Brookfield Farm Site of Biological Importance located across part of the northern third of the site.</li> <li>• Flood Zones 2 + 3 located across part of the northern third of the site.</li> <li>• The Hag Biodiversity Alert Site located within the site.</li> <li>• The site has excellent pedestrian accessibility from A460.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Vast majority of the site located within a Mineral Safeguarding Area (with the exception of south east corner).</li> <li>• Large area of TPOs to North East of site</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.</p> <p><u>County Highways assessment</u> Strong initial concerns due to impacts on A460 and reintroduction of HGV movements. Subject to outcome of M54/M6 link road</p>
Site opportunities	<ul style="list-style-type: none"> <li>• A number of Public Right of Ways intersect the site.</li> <li>• The site is well contained on all sides. The strongest definition is along the west, north and east boundaries as the site is bordered by both the A460 and M6 respectively. The southern boundary is defined by Hilton Lane with existing residential properties at the western end and centrally. Although Hilton Lane is not as predominant as the A460 and M6, it still delineates the site robustly.</li> <li>• The scale of the site gives it the potential to be strategic in nature.</li> <li>• The site benefits from its proximity to the approved M54 / M6 link road subject to appropriate access formulation. This makes it attractive to the market despite reducing developable area.</li> <li>• Supply chain opportunities exist relating to the proximity of the site to all of i54, ROF Featherstone, Hilton Cross and Four Ashes.</li> <li>• Site is highly accessible and so access to workforce is not considered to be an issue.</li> </ul>
Proposed for allocation	<p>The site performs relatively well and has a clear advantage for distribution/logistics of being close to the M6 (J11). However, major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. The County highways team have also expressed some initial concerns about the impact of loading traffic back onto the A460, something the M54/M6 link road is designed to alleviate. Given this, uncertainty about the prospect of accessing the eastern half of the site, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E45	Address	Land north of i54 / M54.
Site size (ha)	14.2	Proposed use	B1 – Offices or Light Industrial. B2 – General Industrial.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	61 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	<p>The site is split across two Parishes, with the western third of the site located within Bilbrook Parish, whilst the eastern two-thirds being located within Brewood and Coven Parish.</p> <p>The site is located just north of M54 and i54 adjacent to purpose built A4510 island and bridge link facilitating direct access to both. As such, the site is located less than 0.1km from i54 Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts an hourly or better bus service is located approx. 0.6km south of the site along Innovation Drive.</li> <li>• There is currently no train station located within an appropriate distance of the site. However, the proposed Brinsford Parkway Railway Station would be located approx. 3.7km east of the site.</li> <li>• The site sits immediately adjacent J2, M54 eastbound exit. Approx. 0.6km east of the site is both the westbound exit and A449.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Very high.		
Landscape sensitivity	Low – moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• The site is located adjacent operational sewage works which may render the site unattractive.</li> <li>• Site is slightly sloped in topography and includes wooded area in its eastern half.</li> <li>• Waterhead Brook dissects the site, with Flood Zones 2 + 3, limiting development potential.</li> </ul>		

	<ul style="list-style-type: none"> <li>Staffordshire and Worcestershire Canal Green Corridor Open Space and Canal Conservation Area adjacent to the eastern boundary of the site.</li> <li>Pedestrian accessibility would need to be formulated as footpath only presently exist south of the M54.</li> <li>Entire site located within a Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate possible watercourse.</p> <p><u>County Highways assessment</u> Ok in principle - no concerns from Highways Authority, but consultation with Highways England required.</p>
Site opportunities	<ul style="list-style-type: none"> <li>Cycle connectivity to the site provided by Bridleway along canal.</li> <li>Brewood and Coven 42 Public Right of way extends from the northern tip of the site. Bilbrook 7 PROW runs adjacent to the majority of the western boundary of the site.</li> <li>The site is very strongly contained across all boundaries. The southern boundary provides the strongest definition through the M54 (and associated link / access roads) with i54 built-up area beyond. The eastern and northern boundaries are also strong due to the position of the canal and sewage works, whilst the western boundary is defined by existing tree-line and solar farm beyond that. The only boundary of the site that may be of concern is the north west where a weak tree-line separates the site from the agricultural land beyond.</li> <li>Investment by JLR in neighbouring i54 makes the site attractive to supply chain operators acting to anchor operatives. Development should provide smaller units suitable for supply chain.</li> <li>As the site is located within close proximity to both Wolverhampton urban area and established i54 employment site there is no anticipated issues for access to workforce.</li> </ul>
Proposed for allocation	<p>The site performs relatively well and has a clear advantage of being very close to the existing i54 site. However, major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E46	Address	Aspley Farm, south of Four Ashes.
Site size (ha)	52.26	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	The site was deemed unsuitable in the EDNA2		
Policy area and access to infrastructure	<p>The site is largely located within Brewood and Coven Parish, with the eastern quarter located within Shreshill Parish just south of the existing Four Ashes employment area. Four Ashes Strategic Employment Site is the nearest formal employment land designation and at its closest point is located approx. 0.02km immediately north on the opposite side of Saredon Brook.</p> <ul style="list-style-type: none"> <li>The nearest bus stop which hosts an hourly or better bus service is located approx. 3.4km west of the site at the junction of A449 Stafford Road and Old Stafford Road / School Lane.</li> <li>The nearest A-Road junction is as above. The nearest motorway junction is located approx. 3.7km north east of the site at J12, M6.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Low – moderate.		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>West Coast Mainline adjoining the western boundary of the site restricts access to the site.</li> <li>Access through Four Ashes challenging due to crossing Saredon Brook and wooded area.</li> <li>Aspley Close is relatively small in access terms – providing infrastructure and visibility obstacles. Northern edge and south east tip of site located within Flood Zone 3.</li> <li>Land at Four Ashes Local Wildlife Site located immediately adjacent the northern edge of the site.</li> </ul>		

	<ul style="list-style-type: none"> <li>• No immediately obvious pedestrian access to the site.</li> <li>• Entire site located within a Mineral Safeguarding Area.</li> <li>• Lack of visibility of the site and proposed access being difficult increases infrastructure / build costs. Potential for the site to become isolated from Four Ashes.</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.</p> <p><u>County Highways assessment</u> Significant highways concerns due to lack of access</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Cycle connectivity to the site provided by Bridleway / Byway located adjacent the south east site boundary.</li> <li>• Shreshill19 Public Right of Way runs adjacent the south east site boundary.</li> <li>• The northern boundary of the site has the strongest containment as it is bounded by Saredon Brook with the existing Four Ashes employment area beyond. The western boundary is also equally as well contained by the WCML.</li> <li>• Although well defined, the south and east boundaries are less strong in their containment potential. The southern boundary at its western end is bounded by a narrow country lane with open fields beyond. The central portion is protected by a number of small farm buildings (unknown use) and their curtilage although the eastern section is weakly contained by a narrow tree line from open field and the canal approx. 120m beyond. The eastern boundary itself is relatively weak as the site bounds Deepmore Lane and Leaches Lane – both of which are narrow country lanes with open fields beyond.</li> <li>• Due to proximity to Four Ashes employment area, the site is considered both attractive to the market and accessible to workforce.</li> <li>• The site could act as a potential development to Four Ashes, and due to its scale allows for development of warehouses. The EDNA2 notes the amount of usable space can be limited whilst still providing substantial development.</li> </ul>
Proposed for allocation	<p>The site performs poorly and was deemed unsuitable as part of the EDNA2 assessment due to being unattractive to the market due to significant access constraints. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E47	Address	Land at Middlehill Farm (Site A).
Site size (ha)	17.11	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	50 – site has potential to be of other (poorest) quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Saredon Parish on the edge of Cannock. The site is equidistant from existing employment sites both within and outside of South Staffordshire administrative area. Located approx. 0.53km north of the site along A460 Wolverhampton Road lies existing informal employment space within Cannock Chase District Council administrative area. Located approx. 0.54km east of the site sits Hawkins Drive Industrial Estate Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stops which hosts an hourly or better bus service is located approx. 2.6km north east along Delta Way.</li> <li>• The nearest railway station is Landywood, located approx. 3.7km south east of the site.</li> <li>• The A460 Wolverhampton runs adjacent the eastern boundary of the site. Junction T8, M6 Toll is located approx. 0.2km south of the site. J11, M6 is located approx. 1.1km south of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Moderate.		
Impact on historic environment	HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• There is an electricity pylon located in the north east corner of the site with associated cabling crossing the site.</li> <li>• Residential amenity issues will need to be considered with development boundary adjoining site in north east corner.</li> </ul>		

	<ul style="list-style-type: none"> <li>• The site has excellent pedestrian access due to proximity of A460 Wolverhampton Road linking the site with Cannock urban area.</li> <li>• Site is located within a Mineral Safeguarding Area, including Brick Clay.</li> <li>• There are clusters of TPOs in the centre of the site and to the northern boundary of the site</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Site is flat in topography.</li> <li>• Access to site should be relatively straightforward.</li> <li>• The site is well connected to the strategic road network.</li> <li>• The site is well contained on its north east, east and south boundaries. The north east boundary abuts the exiting residential dwellings, the eastern boundary abuts the A4601 Wolverhampton and the southern boundary abuts Saredon Road. The western and northern boundaries are not as strong as they are both defined by tree-lines with open fields beyond.</li> <li>• The site is highly attractive to the market due to its strategic size and location. As such, the EDNA2 predicts high interest from developers and occupiers alike.</li> <li>• Due to the proximity of the site from Cannock, accessing workforce is not considered to be an issue.</li> </ul>
Proposed for allocation	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2 and has initial concerns from County highways on the cumulative effect of the development on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>



Site reference	E48	Address	Land at Middlehill Farm (Site B).
Site size (ha)	3.79	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	42 – site has potential to be of other (poorest) quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Saredon Parish on the edge of Cannock urban area. The site is located approx. 300m west of Hawkins Drive Industrial Estate Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located approx. 3.5km east of the site along Coppice Lane.</li> <li>• The nearest railway stations are Cannock and Landywood, located equidistantly from the site at approx. 3.9km south east and north east of the site respectively.</li> <li>• The A460 / Saredon Road island is located adjacent the north east of the site providing immediate access onto an A-Road. Junction T8, M6 Toll is located approx. 0.3km south west of the site. J11, M6 is located approx. 1.3km south west of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Very High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• Proximity of residential dwellings to the south east of the site will pose amenity considerations.</li> <li>• Site has potentially excellent access to A4601 Wolverhampton Road which provides lighted pedestrian access to Wedges Mills and Cannock.</li> <li>• Site is located within a Brick Clay Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u></p>		

	<p>Low risk.</p> <p><u>County Highways assessment</u></p> <p>Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Cycle path located at the south east corner of the site.</li> <li>• Saredon17 Public Right of Way is located from the centre of the site running east to the A460 (connecting to the cycle path).</li> <li>• The site is very neatly located with a strong boundary around the majority of the site afforded by A4601 Wolverhampton Road to the west and A460 to the east. The northern boundary is not as strong and is currently provided by a tree line from open fields beyond. Small portion of this boundary provided by residential complex of converted barns. These existing residential dwellings and those along the southern end of Wolverhampton Road may compromise the provision of a connected site.</li> <li>• Due to the location of the site, in particular its proximity to the strategic road network and Cannock area, the site is attractive to the market and should easily access workforce.</li> </ul>
Proposed for allocation	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2, has initial concerns from County highways on its cumulative effect on the highway network, and is in an area of brick clay safeguarding. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E49	Address	Land at Middlehill Farm (Site C).
Site size (ha)	3.3	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	52 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is located in Cheslyn Hay Parish on the edge of Cannock Urban area, south of Middle Hill Farm. The is located approx. 165m south west of Hawkins Drive Industrial Estate Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located approx. 0.8km south east of the site along Wolverhampton Road.</li> <li>• The nearest railway station is Landywood, located approx. 2.7km south east of the site.</li> <li>• The A460 / Saredon Road island is located approx. 120m north of the site. Junction T8, M6 Toll is located approx. 0.5km west of the site. J11, M6 is located approx. 1.6km south east of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• Topography of the sight is sloped.</li> <li>• Site is located within a Brick Clay Mineral Safeguarding Area.</li> <li>• TPOs situated on Western boundary of site</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate possible watercourse.</p> <p><u>County Highways assessment</u></p>		

	Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions
Site opportunities	<ul style="list-style-type: none"> <li>• Cheslyn Hay 3 Public Right of Way runs adjacent to southern boundary of site.</li> <li>• The site fits into existing field pattern. It is well contained by a wedge of dense tree growth acting as a buffer to the M6 Toll on the site's northern boundary. The eastern boundary is also well bounded by Saredon Road. The southern and western boundaries are a little weaker as they are defined by hedge / tree rows protecting the site from open fields beyond.</li> <li>• The site would be attractive to the market due to excellent motorway network access.</li> <li>• Due to proximity of the site to strategic road network and Cannock, access to workforce is not anticipated to be problematic.</li> </ul>
Proposed for allocation	The site performs relatively poorly with a number of key constraints including its location within a brick clay safeguarding area and initial concerns from County highways on its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.

Site reference	E50	Address	Land at M6 Toll, Cheslyn Hay
Site size (ha)	2.76	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	58 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Cheslyn Hay Parish on the edge of Cannock Urban area. The site sits to the north west of Hawkins Drive Industrial Estate Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located approx. 0.8km south of the site along Wolverhampton Road.</li> <li>• The nearest railway station is Landywood, located approx. 2.7km south east of the site.</li> <li>• The A460 / Saredon Road island is located approx. 0.2m north west of the site providing access onto an A-Road. Junction T8, M6 Toll is located approx. 0.8km west of the site. J11, M6 is located approx. 1.6km south west of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Low – Moderate.		
Landscape sensitivity	Low.		
Impact on historic environment	<p>HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.</p>		
Known site constraints	<ul style="list-style-type: none"> <li>• The site is currently uneven in topography and vegetated.</li> <li>• Alternative site access is located off Saredon Road which is not in the site promoters control.</li> <li>• No clear access to the site from Hawkins Drive Industrial Estate.</li> <li>• Site is located within a Brick Clay Mineral Safeguarding Area.</li> </ul>		

	<p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Significant highways concerns due to lack of suitable access</p>
Site opportunities	<ul style="list-style-type: none"> <li>• The site fits very well into existing urban infrastructure with the M6 Toll bounding the site to the north, and Hawkins Drive Industrial Estate bounding the site to the east and south. The west of the site is contained by a wooded area.</li> <li>• The site provides an opportunity for 'natural' expansion to existing employment area subject to plot accessibility.</li> <li>• Due to the proximity of the site to motorway network and established employment area, market interest is anticipated to be high.</li> <li>• Due to the proximity of the site to strategic road network and Cannock, access to workforce is not anticipated to be problematic.</li> </ul>
Proposed for allocation	<p>The site performs relatively poorly with a number of key constraints including its location within a brick clay safeguarding area and initial significant concerns from County highways relating to the lack of a suitable access. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E51a	Address	Extension to Bericote, Four Ashes (Site A).
Site size (ha)	6.96	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	70 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Penkridge Parish and is immediately adjacent to Four Ashes Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located approx. 0.8km west of the site along A449 Stafford Road.</li> <li>• The A449 Stafford Road is located approx. 0.8km west of the site. Junction 12, M6 is located approx. 3.9km north east of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Moderate – High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• The site is currently a wooded area.</li> <li>• Gravelly Way which runs along the western boundary of the site provides a well-lit pedestrian access to the site from A449 Stafford Road.</li> <li>• Majority of the site is within an area of high habitat distinctiveness, which the NRN mapping indicates should be avoided for development</li> <li>• Site is located within a Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Ok in principle.</p>		

<p>Site opportunities</p>	<ul style="list-style-type: none"> <li>• Bridle-way / Byway along canal which is located approx. 370m west of the site providing cycle provision for the site.</li> <li>• The site provides opportunity for 'natural' extension to existing Four Ashes employment area.</li> <li>• Development of the site could provide a new access to Four Ashes from Vicarage Road and further improve accessibility to Bericote with another point of access.</li> <li>• The site sits within current field boundaries. The parcel of land is well defined to the west by the existing Four Ashes employment area. The eastern boundary of the site is defined by further wooded area. Although the north and the south are contained by field markings, this does not provide strong protection to open fields beyond. However eventually the proposed West Midlands Interchange will border the site on north, east and southern boundaries.</li> <li>• Highly desirable location to the market due to proximity of Four Ashes which has received significant investment recently and there remains outstanding interest and development potential.</li> <li>• Due to the location of the site adjacent to Four Ashes, the site is attractive to the market and should easily access workforce.</li> </ul>
<p>Proposed for allocation</p>	<p>The site performs relatively well and has a clear advantage of being a logical extension to an existing employment site, however it is entirely wooded and is an area of high habitat distinctiveness. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Despite this, its Green Belt function could potentially be weakened in the future by the presence of surrounding employment land as WMI is developed. However, given that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>



Site reference	E51b	Address	Extension to Bericote, Four Ashes (Site B).
Site size (ha)	1.92	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage and Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	70 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Penkridge Parish and is immediately adjacent to Four Ashes Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located approx. 1.1km west of the site along A449 Stafford Road.</li> <li>• The A449 Stafford Road is located approx. 1km west of the site. Junction 12, M6 is located approx. 2.6km north east of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Moderate – High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	<p>HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.</p>		
Known site constraints	<ul style="list-style-type: none"> <li>• The western boundary of the site runs adjacent to the canal Open Space Green Corridor and Conservation Area.</li> <li>• If the site can effectively be connected to the wider existing Four Ashes employment area, then a well-lit pedestrian access can be facilitated.</li> <li>• Site is located within a Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u></p>		

	<p>Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate possible watercourse.</p> <p><u>County Highways assessment</u> OK in principle.</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Bridleway / Byway along canal which runs adjacent western boundary of the site providing cycle provision.</li> <li>• The site provides opportunity for ‘natural’ extension to existing Four Ashes employment area.</li> <li>• Development of the site could provide a new access to Four Ashes from Vicarage Road and further improve accessibility to Bericote with another point of access.</li> <li>• The site sits within current field boundaries. The parcel of land is particularly well defined on three of its four sides. To the west by the canal with existing Four Ashes employment area beyond, to the north by most recent construction at Four Ashes, and to the south by Vicarage Road. The eastern boundary of the site is the weakest containment as defined by tree / hedge row protecting open fields beyond.</li> <li>• The site appears to have been previously used, with approximately two thirds of the site showing signs of development including historic usage. The remaining third has re-naturalised.</li> <li>• Highly desirable location to the market due to proximity of Four Ashes which has received significant investment recently and there remains outstanding interest and development potential.</li> <li>• Due to the location of the site adjacent to Four Ashes, the site is attractive to the market and should easily access workforce.</li> <li>• The site, excluding the electricity substation located in the south east corner, was included in the masterplan for approved application 16/00498/FUL.</li> </ul>
Proposed for allocation	<p>The site performs relatively well and has a clear advantage of being a logical extension to an existing employment site. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Despite this, its Green Belt function could potentially be weakened in the future by the presence of surrounding employment land as WMI is developed. However, given that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E52	Address	Land at Laney Green.
Site size (ha)	17.7	Proposed use	B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	46 – site has potential to be of other (poorest) quality employment land.		
Policy area and access to infrastructure	<p>The site straddles both Saredon Parish and Cheslyn Hay Parish and is located approx. 520m south west of Hawkins Drive Industrial Estate Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located approx. 0.6km south of the site along Wolverhampton Road.</li> <li>• The nearest railway station is Landywood, located approx. 2.9km east of the site.</li> <li>• The site is located 1.7km east of J11, M6. The nearest A-Road is the A460 located approx. 1.9km north of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Low – moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• The site is sloped in topography.</li> <li>• Potential conflict with residential amenity as dwellings located to the south west of the site along Wolverhampton Road.</li> <li>• Wolverhampton Road abutting the eastern boundary of the site does have a footpath, although there are no street lights and the quality of the hardstanding is poor. As such, there is no obvious pedestrian access to the site.</li> </ul>		

	<ul style="list-style-type: none"> <li>Site is located within a Mineral Safeguarding Area, including an area of Brick Clay</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions</p>
Site opportunities	<ul style="list-style-type: none"> <li>Cheslyn Hay 2 Public Right of Way adjoins the southern boundary of the site.</li> <li>The site is currently defined by existing field boundaries. The western and eastern / southern boundaries are well defined by road infrastructure. The M6 Toll and Wolverhampton Road provide a strong border to the west whilst Hospital Lane provides definition to the southern boundary (although this is a narrow country lane) alongside an existing industrial works to the south and hedgerows. The northern boundary is are simply hedgerows protecting the site from wider open fields.</li> <li>Due to the site location and size being strategic in nature, the site has the potential to attract a range of developers and occupiers.</li> <li>The proximity of both Cannock and the existing road network ensures that access to workforce is not considered to be problematic.</li> </ul>
Proposed for allocation	<p>The site performs relatively poorly and was deemed 'other' quality in the EDNA2, is sloped in topography, has initial concerns from County highways on the cumulative effect of the development on the highway network, and includes an area of mineral safeguarding for brick clay. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E53	Address	Upper Pendeford Farm.
Site size (ha)	35.11	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	54 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Bilbrook Parish and is sited immediately east of GE Aviation and Balliol Business Park Strategic Employment Sites, and south east of i54 western extension Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located approx. 1km east of the site along Innovation Drive.</li> <li>• The nearest railway station is Bilbrook, located approx. 2.4km west of the site.</li> <li>• The south east corner of the site is located approx. 1.9km west of the A449 Stafford Road, whilst J2, M54 is located approx. 3.5km north east of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Moderate.		
Impact on historic environment	HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• Site has sloped topography towards existing industrial area / River Penk.</li> <li>• The includes historical monument (Pillbox) in situ.</li> <li>• South eastern edge of the site abuts residential area whose amenity will need to be addressed.</li> <li>• Pendeford Wood Ancient Woodland is located approx. 35m north east of the site across the Wobaston Road.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Flood Zones 2 and 3 located between 20m-75m within the site along its western boundary.</li> <li>• Both Wobaston Road (to the north of the site) and The Droveway (to the south of the site) provide well-lit pedestrian and vehicular access to/from Codsall / Bilbrook and Wolverhampton.</li> <li>• Majority of the site is located within Mineral Safeguarding Area except for approx. 0.1km<sup>2</sup> of the north eastern corner of the site.</li> <li>• Site is not as well connected to motorway network as other sites and access could pose problems for HGVs.</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Initial concerns due to impact on surrounding road network</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Cycle path located along Wobaston Road.</li> <li>• The site is strongly bounded on all sides and provides a regular shape for development. The site is bounded by the existing employment areas to its west (Balliol Business Park) and north east (Pendeford Business Park). By residential development to its south east (Wolverhampton urban area), by Wobaston Road to the north and open green space to the south.</li> <li>• A small part of the site is an operation farm and children's home with an existing access road leading to those through the site.</li> <li>• Site could attract multiple occupiers by servicing both industrial and office sectors and therefore is attractive to a wide variety of uses.</li> <li>• Due to being located adjacent to Wolverhampton and near to a number of existing employment areas, access to workforce is not considered to be problematic.</li> </ul>
Proposed for allocation	<p>The site performs relatively well however the sites topography and highway concerns are considered key constraints. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E54	Address	Land east of Wolverhampton Road.
Site size (ha)	36	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	50 – site has potential to be of other (poorest) quality employment land.		
Policy area and access to infrastructure	<p>The western half of the site is located within Saredon Parish, whilst the eastern half of the site is located within Cheslyn Hay Parish on the edge of Cannock. The nearest existing employment area is Hawkins Drive Industrial Estate Strategic Employment Site located approx. 85m south of the site on the opposite side of M6 Toll. Although the north east corner of the site is adjacent to an employment area located within Cannock Chase District Council administrative area.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts an hourly or better bus service is located adjacent the site along Wolverhampton Road.</li> <li>• The nearest railway station is Cannock, located approx. 3.7km north east of the site.</li> <li>• The A460 Lodge Lane is located adjacent the eastern boundary of the site whilst the A4601 Wolverhampton Road is located adjacent the western boundary of the site. Junction T8, M6 Toll is located approx. 0.6km south of the site. J11, M6 is located approx. 2.6km south of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Very High and High		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• Potential for residential amenity issues associated with cluster of dwellings to the west of A4601.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Area to the north of the site (outside site boundary) is located within Flood Zone 2 / 3.</li> <li>• Site poses topographical concerns.</li> <li>• SSSI located adjacent north east corner of the site.</li> <li>• The site has excellent pedestrian access due to proximity of A460 Wolverhampton Road linking the site with Cannock urban area.</li> <li>• Eastern point of the site marginally located within / adjacent to Coal Development High Risk Area.</li> <li>• Site is located within a Brick Clay Mineral Safeguarding Area.</li> <li>• There are various clusters of TPOs within the site</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment at planning stage to investigate possible watercourse.</p> <p><u>County Highways assessment</u> Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Saredon15, Cheslyn Hay6 and Cheslyn Hay5 Public Rights of Way run east – west across the site.</li> <li>• The site fits well into existing infrastructure and provides a regular shape for development. The eastern boundary and western boundary are defined by A-road respectively (A4601 Wolverhampton Road and A460 Lodge Lane). The northern boundary of the site is adjacent to open space with employment land within Cannock approx. 110m beyond and adjacent in the north eastern corner. The southern boundary of the site is defined largely by tree / hedge row, field pattern and small residential area.</li> <li>• The site is strategic in its size and location, as such it is anticipated that high interest will be received from both developers and occupiers.</li> <li>• The site has no known remediation issues.</li> <li>• Due to the proximity of the site from Cannock, accessing workforce is not considered to be problematic.</li> </ul>
Proposed for allocation	<p>The site performs relatively poorly and was deemed ‘other’ quality in the EDNA2, is sloped in topography, has initial concerns from County highways on the cumulative effect of the development on the highway network, and includes an area of mineral safeguarding for brick clay. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>



Site reference	E55	Address	Bridgnorth Road sewage works.
Site size (ha)	2.77	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	The site was deemed unsuitable in the EDNA2		
Policy area and access to infrastructure	<p>The site is located within Wombourne Parish and is located in between Wombourne Enterprise Park Strategic Employment Site and Heathmill Road Industrial Estate Strategic Employment Site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts an hourly or better bus service is located approx. 0.5km east of the site along Brickbridge Lane.</li> <li>• The site is located approx. 2.7km north west of the A449 Stourbridge Road. The nearest motorway junction is over 15km from the site.</li> </ul>		
Sequential test	The site is a Previously Developed Land site in the Green Belt.		
Green Belt harm	Moderate – High.		
Landscape sensitivity	Unreviewed by Landscape Sensitivity Assessment 2019 as considered as part of built-up area alongside adjacent employment sites.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul style="list-style-type: none"> <li>• Water course runs through the centre of the site (north-south).</li> <li>• Remediation costs identified due to the previous use of the site as sewage works.</li> <li>• New access infrastructure required.</li> <li>• Flood zones 2 + 3 located in the central area of the site.</li> <li>• B4176 Bridgnorth Road provides well-lit pedestrian and vehicular access to the site.</li> <li>• Entire site located within a Mineral Safeguarding Area.</li> </ul>		

	<p><u>LLFA comments</u></p> <p>Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.</p> <p><u>County Highways assessment</u></p> <p>Initial concerns with achieving two way access and junction with B4176</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Cycle route located along B4176 Bridgnorth adjacent to the northern boundary of the site.</li> <li>• Wombourne39 Public Right of Way runs adjacent the eastern boundary of the site.</li> <li>• The site fits very well into the existing urban area with existing employment areas bounding the site towards both its eastern and western boundaries – there are tree rows acting as a narrow buffer to separate these. The northern boundary of the site is well defined by the B4176 Bridgnorth Road, whilst the southern boundary of the site is defined by a small wooded area approx. 75m in depth before opening onto a scattering of residential properties.</li> <li>• The entire site is considered to be brownfield owing to its previous use as a sewage works.</li> <li>• Neighbouring employment areas are popular commercial trading area and well occupied by large operators.</li> <li>• The site is currently being marketed but does not appear to have an immediate buyer.</li> <li>• Significant investment is required to bring the site into serviceable plot(s).</li> <li>• The site is well located in a commercially active location so no anticipated problems with access to workforce.</li> </ul>
Proposed for allocation	<p>The site was identified as unsuitable in the EDNA2 and performs poorly due to the considerable number of significant constraints including concerns around viability and site access. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

Site reference	E56	Address	Land at Wall Heath.
Site size (ha)	80.66	Proposed use	B1 – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	53 – site has potential to be of good quality employment land.		
Policy area and access to infrastructure	<p>The site is located immediately north of Wall Heath (Dudley Urban Area) within Himley Parish. Approx. 1.4km north west of the site lies Heathmill Road Industrial Estate Strategic Employment Site although there is a designated employment area located within Dudley Borough approx. 750m south east of the site.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located adjacent the eastern boundary of the site along A449 Wolverhampton Road.</li> <li>• The eastern boundary of the site is located adjacent A449 Wolverhampton Road, whilst J2, M5 is located over 10km south east of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Very High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>• Development of the site would result in a significant loss of agricultural land.</li> <li>• Access to the site is reliant on bridge cutting across railway walk which is currently lined by mature tree belt.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Potential amenity issues with residential dwellings near to the southern boundary of the site.</li> <li>• A449 Wolverhampton Road provides well-lit pedestrian access to the site.</li> <li>• Flood Zones 2 + 3 located along south western, western, and northern boundaries of the site.</li> <li>• Land at Himley Fields, Hinksford Farm Site of Biological Importance is located along northern boundary of the site.</li> <li>• Kingswinford Railway Walk Biodiversity Alert Site and South Staffordshire Railway Walk Green Space / Open Corridor intersect the north east corner of the site.</li> <li>• The site is located entirely within Mineral Safeguarding Area.</li> <li>• Local Nature Reserve located to the north east of site.</li> </ul> <p><u>LLFA comments</u> Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.</p> <p><u>County Highways assessment</u> Initial concerns due to impact on surrounding road network</p>
Site opportunities	<ul style="list-style-type: none"> <li>• Bridleway / Byway intersects the site between the residential area located to the south of the site and Himley Village to the north providing cycle access.</li> <li>• Himley 5(b) and Himley 6 Public Rights of Way intersect the site in a north / south direction, Himley 7 PROW runs adjacent the western boundary of the site.</li> <li>• The site encompasses a large area extending northwards from the existing urban area part of Wall Heath / Dudley MBC. It is of relatively regular shape although would likely be brought forward as parcels which may impact upon coherent development patterns – compounded by mature tree line intersecting the site from the north through to the east. The site is strongly defined to its east and north east by A449 Wolverhampton Road and B4176 Bridgnorth Road respectively. The southern boundary is defined by the field pattern / hedge/tree row with existing urban area as residential dwellings established beyond with a narrow open space buffer in-between. The western and north western boundaries are defined by field pattern / hedge/tree rows with agricultural fields beyond.</li> <li>• Due to the site being strategic in size, it offer potential for a range of unit types and sizes and is therefore attractive to the market. Furthermore, the site is expected to be subject to minimal abnormal development (remediation) costs.</li> <li>• Due to the site location in close proximity to Dudley and Birmingham urban areas there is a strong employment population catchment, whilst public transport networks operate around the site.</li> </ul>
Proposed for allocation	The site performs relatively poorly with a number of key constraints including its potential impact on mature tree belt along the railway walk that cuts through the

	site, and its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.
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Site reference	E57	Address	Land at Mount Pleasant, Dunston.
Site size (ha)	2.6	Proposed use	B1 – Office or Light Industrial.
<b>Site selection criteria</b>	<b>Assessment</b>		
SA findings	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in Appendix B of the 2020 Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>		
EDNA2 Score	61 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	<p>The site is located within Acton Trussell and Bednall Parish on the adjacent side of the A449 from Acton Gate and Acton Plaza Strategic Employment Sites.</p> <ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located adjacent the western boundary of the site along A449.</li> <li>• The nearest railway station is located approx. 4.8km north of the site at Stafford.</li> <li>• The A449 is located adjacent the western boundary of the site, whilst J13, M6 is located approx. 0.5km south of the site.</li> </ul>		
Sequential test	Site is designated Open Countryside which is sequentially preferable to other Green Belt site options.		
Green Belt harm	Site located entirely within designated Open Countryside.		
Landscape sensitivity	Unreviewed by Landscape Sensitivity Assessment 2019.		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		
Known site constraints	<ul style="list-style-type: none"> <li>• Potential for amenity issues with farm located to the north of the site.</li> <li>• Development of the site would require limited loss of agricultural land.</li> <li>• Flood Zones 2 + 3 are located along the western boundary of the site.</li> <li>• The A449 provides a well-lit pedestrian access to the site.</li> <li>• The site is entirely located within a Mineral Safeguarding Area.</li> </ul> <p><u>LLFA comments</u> Low risk.</p> <p><u>County Highways assessment</u> Initial concerns with achieving suitable access off A449</p>		
Site opportunities	<ul style="list-style-type: none"> <li>• The site provides a regular shape for development and is well defined by existing infrastructure. The A449 provides strong definition to the west of</li> </ul>		

	<p>the site. The remaining boundaries of the site are less strongly bounded but still well defined by existing residential dwelling(s) to the north, Mill Lane to the east and deep tree line to the south.</p> <ul style="list-style-type: none"> <li>• The site has potential to be extension to existing nearby successful employment areas.</li> <li>• The site is expected to be attractive to the market as minimal abnormal development / remediation costs are envisaged.</li> <li>• Site is closely located to the motorway and strategic highway network alongside Stafford urban area and as such is available to access by a wide workforce.</li> <li>• Public transport network operate around the site.</li> </ul>
Proposed for allocation	<p>The site performs relatively well and has a clear advantage of being close to Junction 13 of the M6 as well as an existing employment area, and the site is not in the Green Belt. However there are initial highways concerns relating to the potential site access. Given these points, and that current evidence suggests local needs are being met and WMIs (site E33) role in meeting cross boundary needs, the site is not currently proposed for allocation.</p>

## Appendix B: Maps of employment site options















