

**South Staffordshire District Council**

# **South Staffordshire Green Belt Study Addendum**

**Final report**

Prepared by LUC

August 2022





## South Staffordshire District Council

### South Staffordshire Green Belt Study Addendum

**Project Number**  
12128

Version	Status	Prepared	Checked	Approved	Date
1.	Final	R.Swann	S.Young	S.Young	03.08.2022

Bristol  
Cardiff  
Edinburgh  
Glasgow  
London  
Manchester

landuse.co.uk

Land Use Consultants Ltd  
Registered in England  
Registered number 2549296  
Registered office:  
250 Waterloo Road  
London SE1 8RD

100% recycled paper

Landscape Design  
Strategic Planning & Assessment  
Development Planning  
Urban Design & Masterplanning  
Environmental Impact Assessment  
Landscape Planning & Assessment  
Landscape Management  
Ecology  
Historic Environment  
GIS & Visualisation



# Contents

---

## Chapter 1

### **Introduction** **1**

Context	1
Addendum content	2
Assessment methodology	2
Addendum structure	2

---

## Chapter 2

### **Additional Harm Assessment** **3**

---

## Chapter 3

### **Amended Overview Maps and Summary Tables** **8**

# Chapter 1

## Introduction

**1.1** This report is an addendum to the South Staffordshire Green Belt Study (2019), providing an additional sub-parcel assessment and amended maps and tables to reflect the addition of the sub-parcel.

### Context

**1.2** The South Staffordshire Green Belt Study was published in July 2019, alongside a study employing the same methodology for the Black Country authorities. This work forms an important piece of evidence for the review of the South Staffordshire Local Plan, for which Preferred Options were published in November 2021 for public consultation.

**1.3** The study comprised two parts:

- A Stage 1 study which drew out strategic variations in the 'contribution' of Green Belt land to the Green Belt purposes as defined in the National Planning Policy Framework (NPPF).
- A Stage 2 study which provided a more focused assessment of the potential 'harm' of removing land from the Green Belt, taking into consideration both the loss of contribution to the Green Belt purposes of land that would be released and the impact that this release would have on the integrity of remaining Green Belt land.

**1.4** The assessment area for Stage 2 incorporated:

- Land within South Staffordshire adjacent to selected inset settlements, adjacent to settlements abutting the Green Belt's outer edge, or adjacent to inset development in any of the Black Country districts.
- Promoted development sites identified by the Council in their Strategic Housing and Economic Land Availability Assessment (SHELAA), either as extensions to existing settlements or as new settlement options.

**1.5** SHELAA sites were included in the Green Belt review where they were identified as 'potentially suitable' sites for urban extensions or new settlements, or where they could be considered as a 'potentially suitable' site for the expansion of a Tier 1-4 settlement (as identified in the Rural Services and Facilities Audit 2018). This was informed by the most up-to-date 'call for sites' submissions available at the time of this assessment.

**1.6** Reference should be made to the 2019 Green Belt Study to understand its scope, context and objectives, including an analysis of Green Belt policy nationally and locally. It should be noted when referring to the 2019 report that the NPPF has subsequently been updated (in July 2021), so the referenced paragraph numbers for Green Belt policy are different.

## Addendum content

**1.7** Subsequent to the 2019 Green Belt Study an additional development proposal came forward which lies outside of the area encompassed by the original Stage 2 assessment. The Council requested LUC to assess this location in terms of the harm to the Green Belt purposes that would result from its release.

**1.8** This addendum provides a Stage 2 Green Belt harm assessment for the additional location, which is split into two sites, named 'Gailey Lea Farm A' (SHLAA reference E58a) and 'Gailey Lea Farm B' (SHLAA reference E58b). The assessment area encompasses two possible boundaries presented by the site promoter, and so is slightly larger than either option, but this difference has no bearing on the assessment outcome.

**1.9** The addition of this assessment in turn requires the update of several of the overview maps that were presented in the Stage 2 Findings chapter of the 2019 Green Belt Study (Chapter 7).

**1.10** The South Staffordshire Green Belt Study was carried out in tandem with the South Staffordshire Landscape Sensitivity Assessment. A separate addendum has been produced to provide an assessment of the sensitivity of landscape in this location to development.

## Assessment methodology

**1.11** The assessment methodology is unchanged from 2019. Reference should be made to Chapter 6 of that report: Stage 2 Methodology.

## Addendum structure

**1.12** Chapter 2 presents the output of the Stage 2 harm assessment for the area encompassing the Gailey Lea Farm sites.

**1.13** Chapter 3 presents revised versions of those overview maps affected by the additional assessment sites, and revised summary tables listing assessment ratings.

## Chapter 2

### Additional Harm Assessment

**2.1** The Gailey Lea Farm sites (references E58a and E58b) lie within Stage 1 assessment parcel S2. Two sub-parcels were identified at Stage 2 for this parcel, referenced as S2A and S2B, so the Stage 2 harm assessment encompassing the Gailey Lea Farm sites required the definition of a further sub-parcel: S2C. The assessment for S2C is presented on the following pages, in the same format as the assessments contained in Appendix 3 of the South Staffordshire Green Belt Study.

**2.2** The OS base mapping and development constraints shown in the assessment are unchanged from the 2019 Green Belt Study. There have been no changes to either mapping or constraints which would affect the assessment for the Gailey Lea Farm sites.





### Sub-Parcel Description

Farmland to the east of the M6, between Gailey Reservoirs and Fullmoor Wood.



*Looking west from bridleway between Gailey Lea Lane and Fullmoor Lane.*



## Assessment of Parcel Contribution to Green Belt Purposes (as derived from Stage 1 Study)

GB Purpose	Assessment	Rating
<b>P1: Checking the unrestricted sprawl of large built-up areas</b>	Land is close to the large built-up area and is to an extent contained by urban development, but retains openness and some relationship with the wider countryside.	<b>Moderate</b>
<b>P2: Preventing the merging of neighbouring towns</b>	Land plays no significant role due to the distance between the Cannock built up area and Stafford, its nearest neighbouring towns.	<b>Weak / No contribution</b>
<b>P3: Safeguarding the countryside from encroachment</b>	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	<b>Strong</b>
<b>P4: Preserve the setting and special character of historic towns</b>	Land does not contribute to the setting or special character of a historic town.	<b>Weak / No contribution</b>
<b>P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land</b>	All parcels are considered to make an equal contribution to this purpose.	<b>Strong</b>

## Assessment of Harm From Release of Land within Sub-Parcel

Scenario	Size (ha)	Rating
<b>S2Cs1 Release of any land within the sub-parcel</b>	<b>114.12</b>	<b>Very High</b>
<b>List of Sites Within the Scenario</b>		

Ref: E58a (Employment); Ref: E58b (Employment)

The sub-parcel makes a strong contribution to preventing encroachment on the countryside and a moderate contribution to preventing the sprawl of the West Midlands conurbation. Development in this sub-parcel would form a new inset settlement that has a very weak relationship with any existing urban area. It will also have strong distinction from the forthcoming West Midlands Interchange, to be located at its nearest point c.600m to the south-west, with the M6, reservoirs and tree cover all acting as separating features.

The release would weaken gaps between Cannock, Penkridge and the Four Ashes industrial area (to be expanded to incorporate the West Midlands Interchange), negating the role of the M6 in providing separation between Cannock and the other two. The M6 would form a strong western edge to a new inset area in this sub-parcel, and Fullmoor Wood and Gailey Reservoirs are also strong boundary features, but there are only hedgerows to form a weak eastern boundary in the direction of Cannock.



## Chapter 3

### Amended Overview Maps and Summary Tables

**3.1** As a result of the addition of sub-parcel S2C, the following overview maps from Chapter 7 of the South Staffordshire Green Belt Study have been amended:

- Figure 7.1a: Stage 2 Sub-Parcels and Promoted Sites –South Staffordshire (North)
- Figure 7.2a: Stage 2 Sub-Parcels and Absolute Constraints – South Staffordshire (North)
- Figure 7.3a: Harm assessment – South Staffordshire (North).

**3.2** The OS base mapping and development constraints shown in the overview maps are unchanged from the 2019 Green Belt Study, and no changes have been made to the maps other than to reflect the additional sub-parcel.

**3.3** The following summary tables have been amended to reflect the additional sub-parcel:

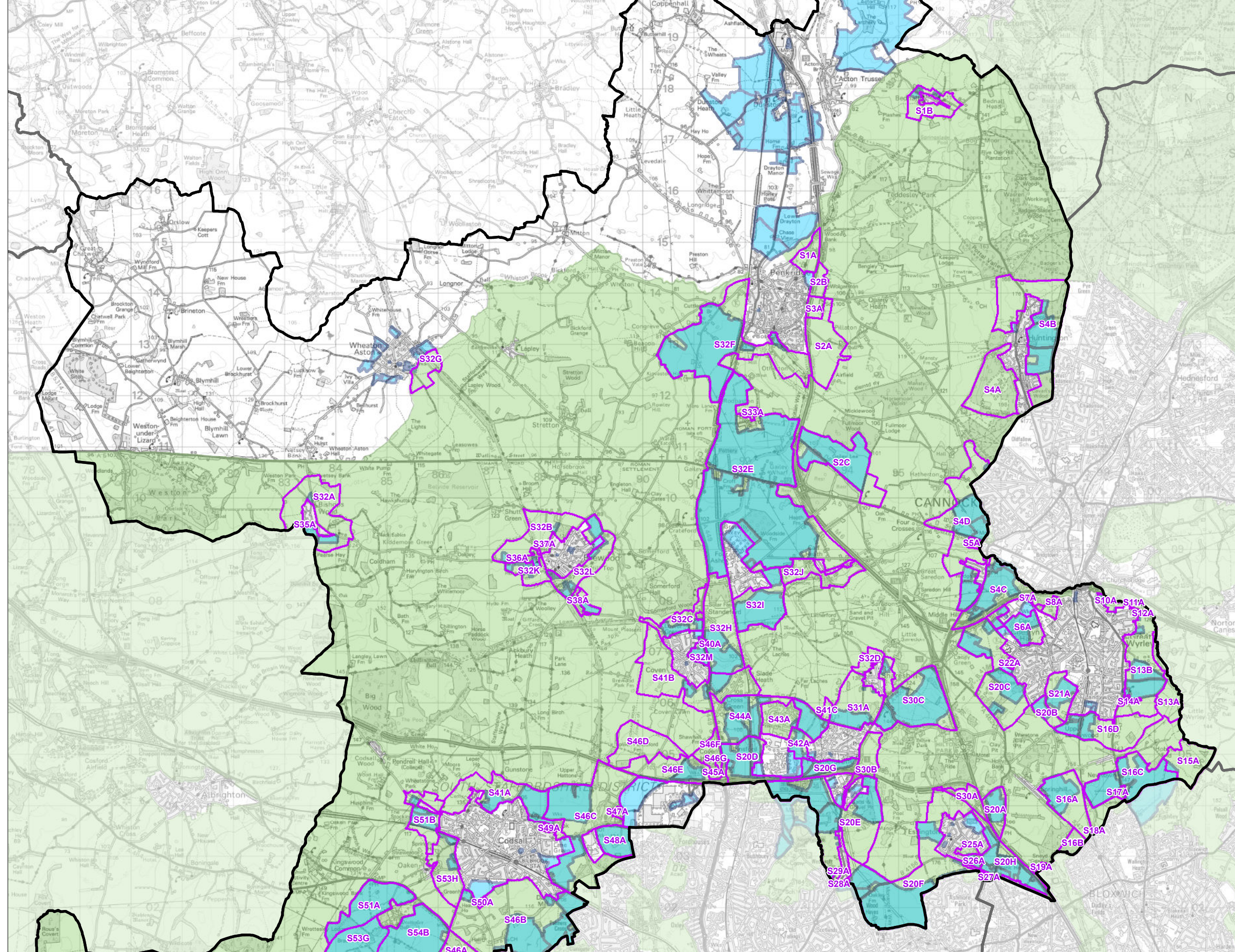
- Table 7.1: Green Belt assessment of harm ratings: by sub-parcel
- Table 7.2: Green Belt assessment of harm ratings: by site
- Table 7.3: Total area of land assessed at each harm rating
- Table 7.4: Total area of land within promoted sites assessed at each harm rating.

**3.4** The amended maps and tables, set out on the following pages, have been given their original figure/table numbers. Refer to the original South Staffordshire Green Belt Study for other, unchanged maps.

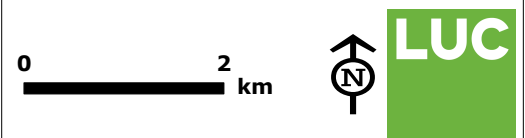


## South Staffordshire Green Belt Study

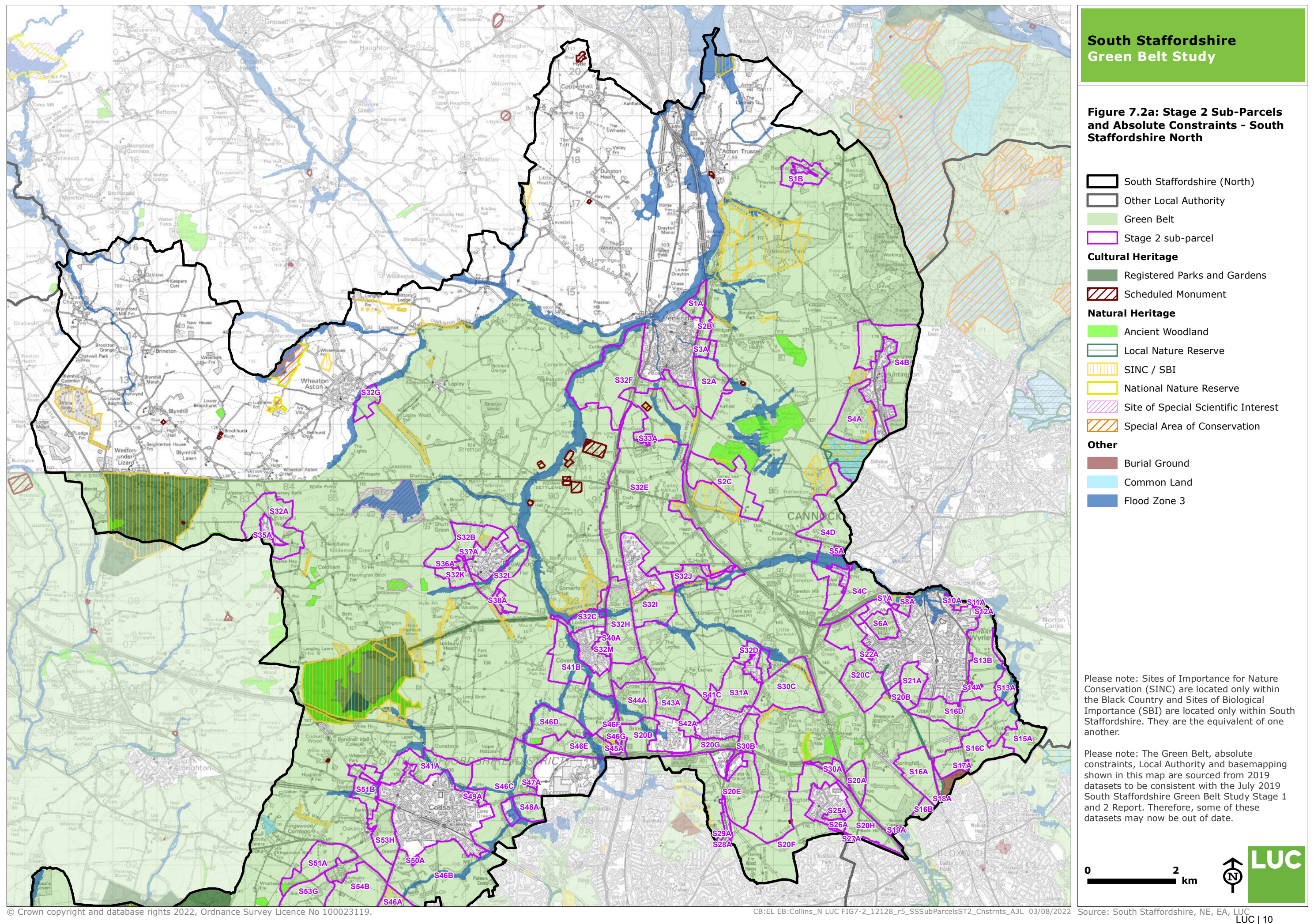
**Figure 7.1a: Stage 2 Sub-Parcels and Promoted Sites - South Staffordshire North**



Please note: The Green Belt, Local Authority and basemapping shown in this map are sourced from 2019 datasets to be consistent with the July 2019 South Staffordshire Green Belt Study Stage 1 and 2 Report. Therefore, some of these datasets may now be out of date.



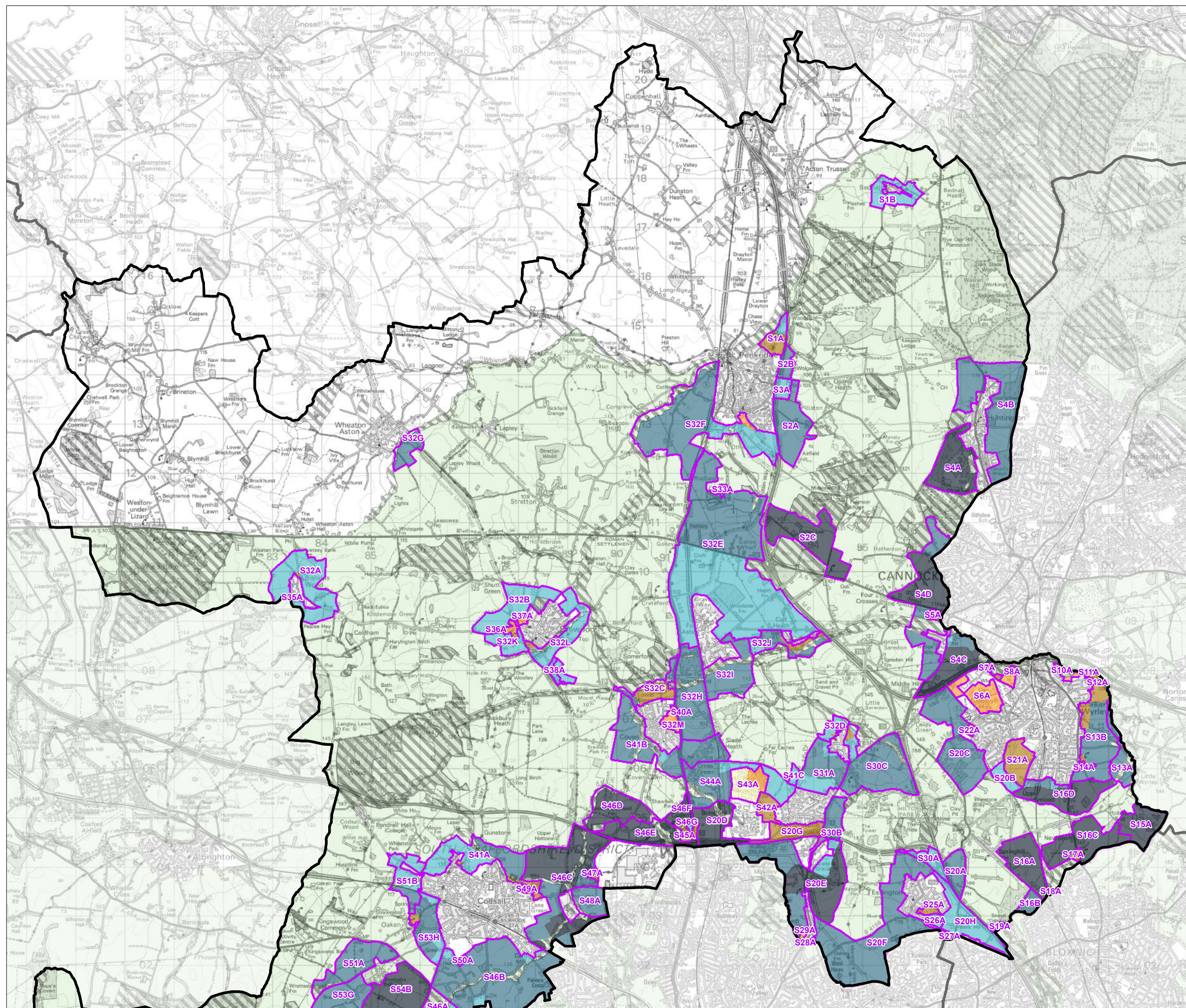






## South Staffordshire Green Belt Study

**Figure 7.3a: Harm Assessment - South Staffordshire North**



- South Staffordshire (North)
  - Other Local Authority
  - Green Belt
  - Absolute constraints
  - Stage 2 sub-parcel
- Harm rating**
- Very High
  - High
  - Moderate - High
  - Moderate
  - Low - Moderate
  - Low
  - Very Low

Please note: The Green Belt, absolute constraints, Local Authority and basemapping shown in this map are sourced from 2019 datasets to be consistent with the July 2019 South Staffordshire Green Belt Study Stage 1 and 2 Report. Therefore, some of these datasets may now be out of date.

0 2 km





Table 7.1: Green Belt assessment of harm ratings: by sub-parcel

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S1As1	16.1	Moderate
S1As2	6.8	Moderate - High
S1Bs1	41.7	Moderate - High
S2As1	78.1	High
S2Bs1	16.4	High
S2Cs1	114.1	Very High
S3As1	12.8	Moderate - High
S4As1	86.0	Very High
S4Bs1	180.3	High
S4Cs1	64.6	Very High
S4Cs2	11.1	High
S4Cs3	2.5	Moderate - High
S4Ds1	78.8	Very High
S4Ds2	64.3	High
S5As1	4.3	Low - Moderate
S6As1	44.4	Low - Moderate
S7As1	2.8	Moderate
S8As1	8.0	Low - Moderate
S10As1	0.6	Moderate
S10As2	2.0	Low - Moderate
S11As1	4.4	Moderate
S12As1	2.0	Low
S13As1	28.2	High
S13Bs1	87.5	High
S13Bs2	25.5	Moderate
S14As1	2.1	Very Low
S15As1	53.0	Very High
S16As1	72.0	Very High
S16Bs1	15.6	High
S16Cs1	91.8	Very High
S16Ds1	77.0	Very High
S16Ds2	8.7	High
S16Ds3	3.8	Moderate - High
S17As1	3.6	Moderate
S18As1	0.6	Moderate
S19As1	3.8	Moderate - High
S20As1	31.0	High
S20Bs1	15.9	Moderate - High
S20Cs1	131.1	High
S20Ds1	56.5	Very High
S20Es1	96.5	Very High
S20Es2	77.7	High
S20Es3	16.2	Moderate - High
S20Fs1	240.2	High
S20Gs1	35.4	Moderate
S20Hs1	69.5	Moderate - High

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S21As1	39.9	Moderate
S22As1	3.8	Low
S25As1	7.7	Moderate
S26As1	7.8	Moderate - High
S27As1	2.5	Low
S28As1	1.2	Low - Moderate
S29As1	2.9	Low - Moderate
S30As1	21.3	Moderate - High
S30Bs1	30.3	High
S30Cs1	115.5	High
S30Cs2	9.7	Moderate - High
S30Cs3	3.4	Moderate
S31As1	49.1	High
S31As2	55.3	Moderate - High
S32As1	110.9	Moderate - High
S32As2	0.7	Moderate
S32Bs1	71.9	Moderate - High
S32Cs1	10.9	High
S32Cs2	23.7	Moderate
S32Ds1	13.8	Moderate - High
S32Ds2	1.0	Moderate
S32Es1	225.9	High
S32Es2	347.2	Moderate - High
S32Fs1	171.7	High
S32Fs2	54.0	Moderate - High
S32Fs3	5.2	Low - Moderate
S32Gs1	25.2	High
S32Hs1	106.8	High
S32Is1	68.5	High
S32Js1	22.9	High
S32Js2	7.7	Moderate - High
S32Js3	8.0	Moderate
S32Ks1	26.5	Moderate - High
S32Ls1	61.4	Moderate - High
S32Ls2	2.7	Moderate
S32Ms1	12.5	Low - Moderate
S33As1	2.8	High
S35As1	0.6	Very Low
S36As1	2.8	Moderate
S36As2	6.8	Low - Moderate
S37As1	3.3	Low - Moderate
S38As1	6.6	Moderate - High
S40As1	1.2	Moderate - High
S41As1	35.3	High
S41As2	52.8	Moderate - High
S41As3	10.8	Moderate
S41Bs1	126.5	High

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S41Bs2	3.8	Moderate - High
S41Cs1	5.8	Moderate - High
S42As1	20.0	Moderate
S43As1	14.5	Low - Moderate
S43As2	29.4	Very Low
S44As1	64.3	High
S44As2	12.0	Moderate - High
S45As1	10.6	Moderate
S46As1	63.3	Moderate - High
S46Bs1	251.5	High
S46Bs2	13.9	Moderate - High
S46Cs1	144.9	Very High
S46Cs2	58.4	High
S46Ds1	62.1	Very High
S46Es1	62.9	Very High
S46Fs1	18.7	Very High
S46Gs1	2.5	Moderate - High
S47As1	4.0	Moderate
S48As1	33.0	High
S49As1	3.6	Low - Moderate
S50As1	2.9	Moderate
S51As1	72.7	High
S51Bs1	13.5	High
S51Bs2	29.9	Moderate - High
S53As1	27.6	High
S53As2	10.9	High
S53As3	6.2	Moderate
S53Bs1	117.0	Moderate - High
S53Bs2	3.2	Low - Moderate
S53Cs1	61.9	Moderate - High
S53Cs2	98.8	Moderate
S53Cs3	3.8	Low - Moderate
S53Ds1	39.6	Moderate - High
S53Ds2	17.3	Moderate
S53Ds3	1.5	Low - Moderate
S53Es1	25.2	Moderate - High
S53Fs1	68.2	Moderate - High
S53Fs2	0.2	Moderate
S53Gs1	106.5	High
S53Hs1	45.5	High
S53Hs2	14.4	Moderate - High
S53Hs3	4.1	Moderate
S54As1	13.2	High
S54Bs1	200.8	Very High
S54Bs2	132.6	High
S55As1	26.1	Moderate - High
S56As1	3.4	Low - Moderate



Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S57As1	19.7	Low
S58As1	3.7	Low - Moderate
S59As1	12.5	Moderate
S59Bs1	102.3	High
S59Bs2	14.5	Moderate - High
S59Cs1	93.7	High
S59Cs2	21.1	Moderate - High
S59Ds1	31.0	Moderate - High
S60As1	3.7	Low
S62As1	3.6	Low
S63As1	0.8	Very Low
S64As1	74.0	Moderate - High
S64As2	13.8	Moderate
S64As3	0.7	Low - Moderate
S64Bs1	13.8	Moderate - High
S64Cs1	6.1	Moderate
S64Cs2	5.8	Low - Moderate
S64Ds1	24.1	Moderate - High
S64Ds2	28.9	Moderate
S64Ds3	2.1	Low - Moderate
S64Es1	53.6	Moderate - High
S64Es2	4.6	Moderate
S64Fs1	82.5	Moderate - High
S64Gs1	82.0	Moderate - High
S64Gs2	34.6	Moderate
S65As1	11.6	Moderate
S66As1	3.9	Moderate
S67As1	370.5	Very High
S68As1	4.4	Moderate
S69As1	76.0	Very High
S70As1	2.4	Low
S71As1	112.6	Very High
S71As2	37.2	High
S71Bs1	109.6	Very High
S71Bs2	27.7	Moderate - High
S71Cs1	125.4	Very High
S71Cs2	16.4	Moderate - High
S72As1	90.8	Moderate - High
S72As2	30.1	Moderate
S72Bs1	89.0	High
S72Bs2	9.9	Moderate - High
S72Bs3	11.6	Low - Moderate
S73As1	3.7	Very Low
S74As1	18.9	Low - Moderate
S75As1	94.7	High
S75Bs1	167.6	Very High
S76As1	10.1	Moderate

Sub-parcel Scenario	Area excluding constraints (ha)	Harm Rating
S78As1	60.8	High
S78As2	5.0	Moderate - High
S78As3	3.1	Moderate
S79As1	10.0	Very Low
S80As1	6.7	Low - Moderate
S81As1	40.1	High
S81As2	33.2	Moderate - High
S81As3	13.8	Moderate
S82As1	50.9	Very High
S82Bs1	335.4	Very High
S82Bs2	10.5	Moderate - High
S82Bs3	5.6	Moderate
S82Cs1	28.4	Very High
S82Cs2	105.6	High

Table 7.2: Green Belt assessment of harm ratings: by site

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) <sup>1</sup>	Harm Rating
Ref: 006 (Housing)	3.8	S32Fs3	3.8	Low - Moderate
Ref: 017 (Housing)	2.4	S4Bs1	2.4	High
Ref: 022 (Housing)	4.8	S4Bs1	4.8	High
Ref: 023 (Housing)	1.8	S1Bs1	1.7	Moderate - High
Ref: 024 (Housing)	1.1	S1Bs1	1.0	Moderate - High
Ref: 025 (Housing)	0.3	S1Bs1	0.2	Moderate - High
Ref: 026 (Housing)	0.8	S1Bs1	0.8	Moderate - High
Ref: 054 (Housing)	1.6	S32Ls1	1.6	Moderate - High
Ref: 062 (Housing)	1.0	S38As1	0.8	Moderate - High
Ref: 065 (Housing)	0.2	S36As2	0.1	Low - Moderate
		S32Bs1	0.2	Moderate - High
Ref: 067 (Housing)	5.2	S38As1	0.1	Moderate - High
		S32Ls1	5.1	Moderate - High
Ref: 074 (Housing)	2.3	S32Ks1	2.3	Moderate - High
Ref: 075 (Housing)	4.8	S32Ks1	4.7	Moderate - High
Ref: 075a (Housing)	0.5	S32Ks1	0.5	Moderate - High
Ref: 076 (Housing)	0.6	S32Ls2	0.6	Moderate
Ref: 076a (Housing)	0.4	S32Ls2	0.4	Moderate
Ref: 076b (Housing)	0.6	S32Ls2	0.6	Moderate
Ref: 076c (Housing)	0.7	S32Ls2	0.7	Moderate
Ref: 078 (Housing)	0.7	S32Ls1	0.7	Moderate - High
Ref: 079 (Housing)	2.1	S32Ks1	0.1	Moderate - High
		S36As1	1.9	Moderate
Ref: 082 (Housing)	5.5	S32Cs2	3.1	Moderate
Ref: 083 (Housing)	0.2	S32Ms1	0.2	Low - Moderate
Ref: 084 (Housing)	4.2	S41Bs2	2.5	Moderate - High
Ref: 085 (Housing)	9.2	S32Ms1	9.1	Low - Moderate
Ref: 087 (Housing)	0.7	S32Ms1	0.6	Low - Moderate
Ref: 087 (Housing)	0.7	S32Hs1	<0.1	High
Ref: 090 (Housing)	1.5	S32Gs1	0.1	High
Ref: 091 (Housing)	0.6	S32Gs1	0.1	High
Ref: 096 (Housing)	4.1	S32As1	4.1	Moderate - High
Ref: 097 (Housing)	5.1	S32As1	5.1	Moderate - High
Ref: 099 (Housing)	1.2	S32As2	0.5	Moderate
		S32As1	0.6	Moderate - High
Ref: 102 (Housing)	2.1	S45As1	0.4	Moderate
		S20Ds1	1.7	Very High
Ref: 106 (Housing)*	86.1	S15As1	2.7	Very High
		S16Cs1	43.7	Very High
Ref: 116 (Housing)	22.8	S20Cs1	22.8	High
Ref: 119b (Housing)	3.0	S6As1	3.0	Low - Moderate
Ref: 120 (Housing)	0.5	S8As1	0.5	Low - Moderate
Ref: 130 (Housing)	0.1	S22As1	0.1	Low
Ref: 134 (Housing)	1.9	S13Bs2	1.7	Moderate
Ref: 136 (Housing)	18.6	S21As1	18.6	Moderate
Ref: 137 (Housing)	9.7	S20Bs1	9.4	Moderate - High
Ref: 138 (Housing)	2.8	S10As1	0.6	Moderate
Ref: 150 (Housing)	5.7	S25As1	0.1	Moderate
		S26As1	5.6	Moderate - High
Ref: 151 (Housing)	6.3	S20Hs1	6.2	Moderate - High
Ref: 154 (Housing)	0.8	S20Fs1	0.8	High
Ref: 159a (Housing)	0.2	S20Fs1	0.2	High
Ref: 159b (Housing)	0.6	S20Fs1	0.5	High
Ref: 160 (Housing)	3.0	S20Hs1	3.0	Moderate - High
Ref: 163 (Housing)	12.2	S20Hs1	12.0	Moderate - High
Ref: 164 (Housing)	3.4	S20Hs1	3.3	Moderate - High
Ref: 164a (Housing)	0.5	S20Hs1	0.5	Moderate - High

<sup>1</sup> All promoted site areas and calculations are indicative, dependent on Council data accuracy.

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) <sup>1</sup>	Harm Rating
Ref: 165 (Housing)	28.9	S20Hs1	28.6	Moderate - High
Ref: 166 (Housing)	1.1	S20Hs1	1.1	Moderate - High
Ref: 169 (Housing)	1.3	S31As2	1.3	Moderate - High
Ref: 170 (Housing)	17.1	S20Gs1	17.1	Moderate
Ref: 172 (Housing)	12.7	S30Cs1	12.7	High
Ref: 180 (Housing)	113.0	S69As1	49.9	Very High
Ref: 180 (Housing)*	0.1	S31As2	0.1	Moderate - High
Ref: 181 (Housing)	0.4	S31As1	0.4	High
Ref: 182 (Housing)	0.1	S32Ds1	0.1	Moderate - High
Ref: 183 (Housing)	0.3	S31As2	0.3	Moderate - High
Ref: 184 (Housing)	2.2	S30Cs3	2.2	Moderate
Ref: 185 (Housing)	0.9	S30Cs3	0.9	Moderate
Ref: 192 (Housing)*	2.8	S57As1	0.9	Low
		S58As1	1.3	Low - Moderate
Ref: 197 (Employment and housing)*	100.1	S20Es1	21.6	Very High
		S20Es2	39.3	High
Ref: 200 (Housing)	32.3	S16As1	32.1	Very High
Ref: 202 (Housing)	36.6	S4Cs2	7.0	High
		S4Cs1	29.6	Very High
Ref: 203 (Housing)	5.4	S4Ds2	5.4	High
Ref: 204 (Housing)	0.4	S20Es1	0.4	Very High
Ref: 205 (Housing)	0.2	S20Es2	0.2	High
Ref: 206 (Housing)	0.4	S20Es2	0.4	High
Ref: 207 (Housing)	0.7	S18As1	0.6	Moderate
Ref: 210 (Housing)	1.0	S46Bs2	0.9	Moderate - High
Ref: 211 (Housing)	4.9	S41As1	0.1	High
		S41As3	3.3	Moderate
Ref: 217 (Housing)	24.8	S41As1	23.7	High
Ref: 218 (Housing)	55.8	S46Cs1	52.7	Very High
Ref: 221 (Housing)	2.5	S46Bs2	2.3	Moderate - High
Ref: 222 (Housing)	10.7	S41As2	10.5	Moderate - High
Ref: 224 (Housing)	3.4	S53Hs2	3.4	Moderate - High
Ref: 225 (Housing)	2.4	S51Bs2	2.4	Moderate - High
Ref: 230 (Housing)	3.6	S51Bs2	3.6	Moderate - High
Ref: 236 (Housing)	0.9	S46Bs2	0.9	Moderate - High
Ref: 237 (Housing)	0.8	S46Bs2	0.8	Moderate - High
Ref: 238a (Housing)	7.8	S59Ds1	7.8	Moderate - High
Ref: 238b (Housing)	6.7	S59Ds1	6.6	Moderate - High
Ref: 241 (Housing)	3.3	S46As1	3.2	Moderate - High
Ref: 243 (Housing)	1.4	S46As1	1.4	Moderate - High
Ref: 245 (Housing)	3.7	S59Cs1	0.1	High
Ref: 245 (Housing)	3.8	S75Bs1	0.1	Very High
Ref: 245 (Housing)	3.7	S60As1	3.6	Low
Ref: 246 (Housing)	364.4	S51As1	72.7	High
		S53Gs1	106.4	High
		S54Bs1	171.7	Very High
Ref: 246a (Housing)	9.0	S54Bs1	9.0	Very High
Ref: 249 (Housing)	3.6	S64Es1	3.6	Moderate - High
Ref: 250 (Housing)	3.7	S64Es1	3.7	Moderate - High
Ref: 251 (Housing)	3.2	S63As1	0.1	Very Low
		S64Es1	0.5	Moderate - High
		S64Es2	1.9	Moderate
Ref: 252 (Housing)	3.6	S64Es2	0.1	Moderate
		S64Es1	3.5	Moderate - High
Ref: 253 (Housing)	11.8	S53Fs2	0.2	Moderate
		S53Fs1	11.5	Moderate - High
Ref: 254 (Housing)	0.2	S53Fs1	0.1	Moderate - High
Ref: 255 (Housing)	2.4	S64Es1	0.1	Moderate - High
		S64Es2	2.3	Moderate
Ref: 257 (Housing)	3.4	S53Fs1	3.4	Moderate - High
Ref: 26 (Housing)*	24.1	S71Bs1	0.6	Very High



Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) <sup>1</sup>	Harm Rating
		S71Bs2	6.0	Moderate - High
Ref: 260 (Housing)	7.9	S59Cs1	7.9	High
Ref: 264 (Housing)	4.6	S82Bs1	0.2	Very High
Ref: 271 (Housing)	4.0	S64Gs2	3.9	Moderate
Ref: 272 (Housing)	1.0	S81As3	1.0	Moderate
Ref: 273 (Housing)	4.0	S64Gs2	3.7	Moderate
Ref: 280 (Housing) <sup>+</sup>	21.5	S82Cs2	17.5	High
Ref: 283 (Housing)	9.6	S72As1	2.9	Moderate - High
		S72As2	6.7	Moderate
Ref: 284 (Housing)	2.1	S72Bs3	1.9	Low - Moderate
Ref: 286 (Housing)	0.7	S72As2	0.6	Moderate
Ref: 298 (Housing)	1.9	S53Cs3	1.9	Low - Moderate
Ref: 306 (Housing)	1.8	S72Bs2	1.8	Moderate - High
Ref: 309 (Housing)	4.5	S53Bs1	4.4	Moderate - High
Ref: 310 (Housing)	16.2	S53Cs2	0.5	Moderate
		S74As1	13.9	Low - Moderate
Ref: 312a (Housing)	0.3	S53Bs1	0.2	Moderate - High
Ref: 313 (Housing)	1.4	S72As2	0.6	Moderate
Ref: 314 (Housing)	2.0	S53Bs1	2.0	Moderate - High
Ref: 315 (Housing)	2.0	S71As2	0.4	High
		S71As1	1.5	Very High
Ref: 319 (Housing)	4.0	S64As2	3.9	Moderate
Ref: 320 (Housing)	0.6	S64As2	0.6	Moderate
Ref: 321 (Housing)	1.0	S64As1	0.9	Moderate - High
Ref: 325 (Housing)	0.2	S53Ds2	0.2	Moderate
Ref: 327 (Housing)	0.6	S53Ds3	0.6	Low - Moderate
Ref: 328 (Housing)	0.5	S64Cs2	0.5	Low - Moderate
Ref: 329 (Housing)	1.1	S64Cs2	1.0	Low - Moderate
Ref: 330 (Housing)	0.2	S53Ds1	0.1	Moderate - High
Ref: 330 (Housing)	0.2	S53Ds1	0.1	Moderate - High
Ref: 330 (Housing)	0.2	S53Ds2	<0.1	Moderate - High
Ref: 335a (Housing)	1.2	S72As2	0.5	Moderate
Ref: 335b (Housing)	0.5	S72As2	0.5	Moderate
Ref: 338 (Housing)	0.4	S72As2	0.2	Moderate
Ref: 339 (Housing)	4.2	S71Cs1	4.2	Very High
Ref: 340 (Housing)	0.3	S71Cs1	0.3	Very High
Ref: 343 (Housing)	52.3	S75Bs1	28.3	Very High
Ref: 350a (Housing)	2.4	S59Cs1	2.4	High
Ref: 350b (Housing)	2.8	S59Cs1	2.8	High
Ref: 351 (Housing)	0.2	S59Cs1	0.2	High
Ref: 354 (Housing)	0.3	S67As1	0.3	Very High
Ref: 358 (Housing)	3.7	S64Ds2	3.5	Moderate
Ref: 359 (Housing)	4.1	S64Ds1	4.1	Moderate - High
Ref: 364 (Housing)	10.2	S75Bs1	10.1	Very High
Ref: 365 (Housing)	9.0	S82Bs1	9.0	Very High
Ref: 368 (Housing)	70.9	S71As2	0.5	High
		S71As1	62.9	Very High
Ref: 369 (Housing)	2.6	S71As2	2.5	High
Ref: 370 (Housing)	6.8	S71As2	6.6	High
Ref: 376 (Housing)	2.2	S32Bs1	2.2	Moderate - High
Ref: 392 (Housing)	1.5	S29As1	0.1	Low - Moderate
		S20Es2	1.2	High
Ref: 393 (Housing)	1.6	S27As1	1.5	Low
Ref: 396 (Housing)	25.8	S31As2	25.2	Moderate - High
Ref: 397 (Housing)	3.0	S42As1	1.6	Moderate
Ref: 401 (Housing)	1.2	S64Es1	1.2	Moderate - High
Ref: 402 (Housing)	1.2	S58As1	1.2	Low - Moderate
Ref: 407 (Housing)	46.2	S54Bs2	46.2	High
Ref: 409 (Housing)	0.5	S78As3	0.5	Moderate
Ref: 410 (Housing)	2.9	S64As1	1.1	Moderate - High
Ref: 412 (Housing)	3.8	S53As3	2.4	Moderate

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) <sup>1</sup>	Harm Rating
Ref: 413 (Housing)	6.3	S53Cs2	6.3	Moderate
Ref: 417 (Housing)	0.6	S73As1	0.6	Very Low
Ref: 418 (Housing)	0.3	S13Bs2	0.3	Moderate
Ref: 421 (Housing)	0.9	S64Es1	0.9	Moderate - High
Ref: 430 (Housing)	2.9	S32Fs2	2.9	Moderate - High
Ref: 437 (Housing)	2.6	S53Bs1	2.4	Moderate - High
Ref: 438 (Housing)	0.9	S53Cs3	0.6	Low - Moderate
Ref: 440 (Housing)	1.9	S13Bs2	1.9	Moderate
Ref: 447 (Housing)	1.0	S53Hs2	1.0	Moderate - High
Ref: 454 (Housing)	2.3	S46As1	2.3	Moderate - High
Ref: 458 (Housing)	10.5	S53Cs2	9.2	Moderate
Ref: 463a (Housing)	2.0	S67As1	2.0	Very High
Ref: 463b (Housing)	3.4	S67As1	0.2	Very High
		S72Bs3	3.3	Low - Moderate
Ref: 463c (Housing)	1.0	S72Bs3	1.0	Low - Moderate
Ref: 463d (Housing)	4.1	S67As1	0.1	Very High
		S72Bs3	4.0	Low - Moderate
Ref: 471 (Housing)	14.6	S20Fs1	14.5	High
Ref: 474 (Housing)	0.4	S4Ds1	0.4	Very High
Ref: 474a (Housing)	10.9	S4Ds1	10.9	Very High
Ref: 477 (Housing)	2.0	S53Cs2	2.0	Moderate
Ref: 479a (Housing)	1.3	S72As2	1.3	Moderate
Ref: 486a (Housing)	3.4	S28As1	0.9	Low - Moderate
Ref: 486b (Housing)	21.1	S20Fs1	20.3	High
Ref: 486c (Housing)	94.1	S20Fs1	93.3	High
Ref: 489 (Housing)	32.0	S6As1	26.0	Low - Moderate
Ref: 490 (Housing)	0.2	S10As2	0.2	Low - Moderate
Ref: 492a (Housing)	30.6	S16Cs1	30.2	Very High
Ref: 492b (Housing)	6.2	S16Cs1	6.2	Very High
Ref: 492c (Housing)	45.6	S15As1	2.8	Very High
		S16Cs1	42.7	Very High
Ref: 493 (Housing)	0.7	S75Bs1	0.7	Very High
Ref: 494 former (Housing)	15.8	S65As1	0.6	Moderate
		S59Bs1	15.1	High
Ref: 495 (Housing)	2.9	S65As1	0.6	Moderate
		S59As1	2.3	Moderate
Ref: 503 (Housing)	14.2	S46Bs1	11.9	High
Ref: 504 (Housing)	4.1	S46As1	4.1	Moderate - High
Ref: 505 (Housing)	2.4	S57As1	0.9	Low
		S58As1	1.4	Low - Moderate
Ref: 506 (Housing)	7.3	S46As1	7.3	Moderate - High
Ref: 507 (Housing)	3.2	S53Hs1	3.2	High
Ref: 510 (Housing)	23.0	S46Bs1	22.9	High
Ref: 512 (Housing)	52.3	S46Bs1	50.6	High
Ref: 513 (Housing)	0.2	S41As2	0.2	Moderate - High
Ref: 514 (Housing)	3.9	S54Bs1	3.9	Very High
Ref: 515 (Housing)	3.5	S46Bs2	3.5	Moderate - High
Ref: 519 (Housing)	41.4	S46Cs1	2.0	Very High
		S46Cs2	26.0	High
Ref: 520 (Housing)	4.9	S20Fs1	3.6	High
Ref: 523 (Housing)	2.4	S20Cs1	0.1	High
Ref: 525 (Housing)	15.1	S13Bs1	14.3	High
Ref: 526 (Housing)	22.1	S13Bs2	0.4	Moderate
		S13Bs1	21.5	High
Ref: 527 (Housing)	21.1	S31As2	21.0	Moderate - High
Ref: 536 (Housing)	23.2	S16Ds2	5.8	High
		S16Ds1	16.7	Very High
Ref: 537 (Housing)	40.7	S20Ds1	0.2	Very High
		S20Es2	40.0	High
Ref: 537a (Housing-led mixed use)	21.7	S20Es1	21.1	Very High

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) <sup>1</sup>	Harm Rating
Ref: 544 (Housing)	1.4	S64Cs1	1.4	Moderate
Ref: 546 (Housing)	1.9	S78As2	1.6	Moderate - High
		S78As1	0.1	High
Ref: 547 (Housing)	0.2	S64Cs2	0.2	Low - Moderate
Ref: 548 (Housing)	50.8	S69As1	50.2	Very High
Ref: 549 (Housing)	19.5	S81As3	6.6	Moderate
		S81As1	12.7	High
Ref: 554 (Housing)	12.8	S53Cs2	12.8	Moderate
Ref: 557 (Housing)	0.2	S71Cs1	0.2	Very High
Ref: 558 (Housing)	3.8	S64Cs1	3.8	Moderate
Ref: 559 (Housing)	24.4	S68As1	3.8	Moderate
		S67As1	20.6	Very High
Ref: 560 (Housing)	19.3	S71Cs1	3.3	Very High
		S71Cs2	15.7	Moderate - High
Ref: 561 (Housing)	4.4	S67As1	0.1	Very High
		S68As1	4.2	Moderate
Ref: 563 (Housing)	6.9	S53Cs2	6.9	Moderate
Ref: 566 (Housing)	10.7	S71Bs2	10.7	Moderate - High
Ref: 567 (Housing)	1.8	S71Cs1	1.8	Very High
Ref: 573 (Housing)	42.3	S67As1	42.2	Very High
Ref: 576 (Housing)	8.5	S64Gs2	8.4	Moderate
Ref: 577 (Housing)	38.3	S75As1	38.3	High
Ref: 582 (Housing)	24.4	S59Bs1	10.7	High
		S59Bs2	13.6	Moderate - High
Ref: 585 (Housing)	210.6	S32Es1	208.1	High
Ref: 591 (Housing)	27.4	S4Bs1	27.4	High
Ref: 592 (Housing)	20.9	S4Bs1	20.8	High
Ref: 611 (Housing)	2.6	S32Ls1	2.6	Moderate - High
Ref: 613 (Housing)	48.9	S40As1	0.2	Moderate - High
Ref: 613 (Housing)	48.9	S41Bs1	10.9	High
		S32Hs1	37.8	High
Ref: 615 (Housing)	9.2	S32Cs2	7.9	Moderate
Ref: 616 (Housing)	1.7	S32Ls1	1.6	Moderate - High
Ref: 618 (Housing)	2.1	S41Bs1	2.1	High
Ref: 624 (Housing)	0.9	S4Cs3	0.8	Moderate - High
Ref: 626 (Housing)	1.8	S53Bs1	1.8	Moderate - High
Ref: 627 (Housing)	7.1	S53Bs1	7.1	Moderate - High
Ref: 628 (Housing)	9.4	S53Bs1	9.4	Moderate - High
Ref: 629 (Housing)	12.3	S72As1	12.2	Moderate - High
Ref: 630 (Housing)	13.3	S51Bs2	8.9	Moderate - High
Ref: 633 (Employment or housing)	290.5	S32Es2	289.1	Moderate - High
Ref: 634 (Employment)	20.1	S32Es2	0.1	Moderate - High
Ref: 635 (Employment)	3.8	S20Cs1	3.8	High
Ref: 643 (Employment)	9.9	S32Is1	9.8	High
Ref: 644 (Employment)	6.1	S20Ds1	1.7	Very High
Ref: 646a (Housing)	34.5	S44As1	29.7	High
Ref: 646b (Employment)	29.3	S44As1	0.3	High
		S20Ds1	26.7	Very High
Ref: 646c (Employment)	8.1	S20Ds1	5.5	Very High
Ref: 646d (Employment)	10.4	S44As2	0.2	Moderate - High
		S44As1	10.2	High
Ref: 647 (Employment)	8.7	S20Ds1	0.6	Very High
		S20Gs1	4.8	Moderate
Ref: 648 (Employment)	20.9	S43As1	1.0	Low - Moderate
		S42As1	11.1	Moderate
Ref: 649 (Employment)	33.6	S20Es3	13.2	Moderate - High
		S20Es1	20.3	Very High
Ref: 650 (Employment)	6.7	S4Cs3	0.1	Moderate - High
		S4Cs2	4.0	High
Ref: 651 (Employment)	81.2	S30Cs1	76.4	High

Promoted Site	Total Area of Site	Sub-parcel Scenario	Area of site within Sub-parcel Scenario excluding constraints (ha) <sup>1</sup>	Harm Rating
Ref: 652 (Employment)	39.6	S46Cs1	0.3	Very High
		S46Es1	0.6	Very High
Ref: 653 (Employment)	14.2	S46Es1	7.9	Very High
Ref: 654 (Housing)	84.1	S75Bs1	64.0	Very High
Ref: 655 (Housing)	31.1	S75Bs1	31.1	Very High
Ref: 657 (Housing)	36.3	S59Cs1	36.2	High
Ref: 658 (Housing)	2.0	S32Bs1	2.0	Moderate - High
Ref: 659 (Housing)	0.7	S4Ds2	0.7	High
Ref: 660 (Employment)	17.1	S20Cs1	17.1	High
Ref: 662 (Housing)	8.4	S20Hs1	8.3	Moderate - High
Ref: 665 (Housing)	158.5	S32Fs1	140.2	High
Ref: 666 (Employment or housing)	35.1	S48As1	32.2	High
Ref: 669 (Employment)	7.9	S32Es2	7.8	Moderate - High
Ref: 670 (Employment)	2.0	S32Es2	2.0	Moderate - High
Ref: 671 (Housing)	3.3	S64Ds2	3.3	Moderate
Ref: 672 (Housing)	90.0	S76As1	9.5	Moderate
		S64Fs1	80.5	Moderate - High
Ref: 673 (Housing)	1.4	S82Bs2	1.4	Moderate - High
Ref: 674 (Housing)	14.8	S32Ls1	10.1	Moderate - High
Ref: 675 (Housing)	4.5	S32Ks1	4.5	Moderate - High
Ref: 676 (Housing)	33.5	S4Ds1	33.5	Very High
Ref: 677 (Housing)	0.1	S80As1	0.1	Low - Moderate
Ref: 679 (Housing)	0.8	S20Fs1	0.7	High
Ref: 682 (Housing)	0.3	S71As2	0.3	High
Ref: 683a (Housing)	21.3	S82Cs2	17.0	High
Ref: 684 (Housing)	3.6	S71As2	3.6	High
Ref: E15a (Employment or housing)	17.5	S20As1	17.5	High
Ref: E31 (Employment)	2.5	S44As2	2.5	Moderate - High
Ref: E46 (Employment)	55.7	S32Ls1	52.0	High
Ref: E47 (Employment or housing)	17.1	S4Ds2	17.1	High
Ref: E48 (Employment)	3.8	S4Cs1	3.8	Very High
Ref: E49 (Employment)	3.4	S20Cs1	3.4	High
Ref: E50 (Employment)	2.8	S6As1	2.7	Low - Moderate
Ref: E58a (Employment)	76.4	S2Cs1	76.4	Very High
Ref: E58b (Employment)	10.9	S2Cs1	10.9	Very High

\*Black Country Authorities site references for cross-boundary sites within Sub-parcel scenarios in South Staffordshire.



**Table 7.3: Total area of land assessed at each harm rating**

Harm Rating	Total Area of Land (ha)	Percentage of land
Very High	2,656.02	29.7
High	3,414.6	38.1
Moderate - High	2,094.6	23.4
Moderate	537.0	6.0
Low - Moderate	170.1	1.9
Low	37.6	0.4
Very Low	46.6	0.5

**Table 7.4: Total area of land within promoted sites assessed at each harm rating (excluding absolute constraints)**

Harm Rating	Total Area of Land within Promoted Sites (ha) <sup>2</sup>	Percentage of land <sup>2</sup>
Very High	1,072.62	28.9
High	1,571.40	42.4
Moderate - High	779.00	21.0
Moderate	197.10	5.3
Low - Moderate	81.00	2.2
Low	7.00	0.2
Very Low	0.60	0.0

<sup>2</sup> Note: Where sites overlap, the areas of both sites have been counted within these totals.