

Local Plan Review

Publication Plan

Economic Strategy & Employment Site Assessment Topic Paper

November 2022

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1. Introduction

The Purpose of this Paper

- 1.1 The purpose of this topic paper is to set out the Council's approach to employment land through the Local Plan review and how the Council has assessed and allocated employment site options to meet evidenced employment land requirements for the period 2018-2039. This paper is an update to the topic paper that accompanied the Preferred Options consultation published in 2021.
- 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 Publication Plan.
- 1.3 Within the context of this Topic Paper, employment land relates to development or uses falling within the E(g), B2 and B8 planning use classes¹. The Local Plan referred to in this Topic Paper (either as the Local Plan or emerging Local Plan) is currently at the Regulation 19 'Publication Plan' consultation stage, published in November 2022.
- 1.4 This paper must be read alongside the Council's Local Plan Review Publication Plan consultation, which details the selected employment site(s) and the wider employment strategy of the Council.

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	Support	Support	Support	Mixed
	Option A	Option B	Option C	Option D	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

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

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 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 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 <u>National Planning Policy Framework</u> (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 <u>Build Back Better</u>: <u>our plan for growth</u> 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

<u>Plan</u>, 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). 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 are reviewed through this paper in a manner consistent with the requirements for assessing sites through the SHELAA process as set out in Planning Practice Guidance².

Economic Development Needs Assessment (2022)

- 3.4. An updated Economic Development Needs Assessment (EDNA) to inform the emerging Local Plan was published in 2022 and was an update to a previous EDNA published in 2018. An update was considered necessary in order to have regard to changes in employment projections including as a result of Brexit and Covid, and to ensure that the employment evidence to support the Local Plan was robust and up to date.
- 3.5. The EDNA 2022 in accordance with Planning Practice Guidance analysed the socio-economic landscape of the district (including around employment, business development, demographics and labour markets) and concluded that the local economy in South Staffordshire was healthy and was still benefiting from investment particularly as a result of strategic site delivery in the district. The EDNA also analysed which authorities South Staffordshire had the strongest economic links with and from this identified a Functional Economic Market Area (FEMA) comprising of South Staffordshire, Cannock, Stafford, Dudley, Walsall and Wolverhampton.
- 3.6. The studies main focus was to draw together the market intelligence, economic forecasts and other relevant data to conclude of the employment land needs of the district up until

² Planning Practice Guidance, Paragraph: 005 Reference ID: 3-005-20190722

2040. The study included detailed analysis of employment projections on a sector-by-sector basis utilising data from the three main forecasting houses. The study adjusted the Experian forecast to arrive at a 'LEP based Growth Scenario' and following a series of further adjustments (e.g. building in projected employment losses) arrived at an objectively assessed employment land figure of 63.6ha for South Staffordshire up to 2040.

- 3.7. The study also undertook analysis on the impact of West Midlands Interchange (WMI) on the district, including on the demand for employment, as well as considering the proportion of WMI that could contribute towards the supply of employment land for South Staffordshire given the strategic nature of the site. This concluded that 18.8ha of WMI would contribute towards the district's supply of employment land to meet the projected demand.
- 3.8. The EDNA undertook further analysis by examining the supply/demand balance for the district, in order to inform the amount of employment land that would need to be allocated through the Local Plan. It considered the supply of employment land at the base date of April 2020 (99ha) and explored how this would likely be split between strategic and non-strategic employment land supply. Following consideration of the supply/demand balance specifically for strategic sites it was concluded what proportion of the surplus strategic employment land could be attributed to sub regional supply and what proportion could be considered towards South Staffordshire's supply, informed by the labour demand forecasts. It concluded that in terms of strategic employment land, 36ha (excluding WMI) could reasonably be attributed to cross boundary unmet needs, whilst the supply-demand balancing exercise that could be attributed to South Staffordshire, taking on board both strategic and non-strategic employment land, concluded that there was a small surplus expected to be around 1.5ha. Overall the district can meet its own employment land needs, together with making a proportionate contribution to unmet needs in the Black Country.

Economic Development Needs Assessment Part 2 - Economic Land Availability Assessment (2020)

- 3.9. A second part to the 2018 EDNA was produced in 2020 and involved an initial review of site options for new employment sites suggested through the 'call for sites' process. The second part of the EDNA (EDNA(2)) reflects the site options provided to the council at December 2020 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 at December 2020.
- 3.10. 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. Its findings have fed into the holistic assessment of site options set out in this topic paper. Where site options have been submitted since the EDNA2 was published, these new sites have been assessed utilising the same methodology to that of the EDNA2 and are detailed under the Economic Land Availability Assessment (ELAA) heading within each assessment proforma.

Duty to Cooperate

- 3.11. National guidance requires 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.
- 3.12. 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. In November 2022 Cannock Chase District Council agreed its pre-submission consultation which now proposes 66 hectares of land for employment uses during the plan period and includes 10 hectares provided at the West Midlands Interchange site in South Staffordshire. Their plan includes policies and allocations which require the removal of land from the Green Belt.
- 3.13. The Black Country authorities were preparing their Local Plan with the Black Country Draft Plan (August 2021) confirming that across the Black Country geography, they have a need of 565ha of employment up until the end of their plan period (2039). The Black Country Draft Plan confirmed that they are only able to deliver 355ha of this leaving a shortfall on 210ha. Their Draft Plan indicated 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. In October 2022, the Black Country authorities confirmed that they were no longer pursuing a joint plan, but instead would now be pursuing individual local plans for each authority. The evidence base to support the joint plan, including their EDNA, will be considered for the individual local plans.
- 3.14. Stafford Borough consulted on their Issues and Options document in 2020 where they set out a demand between 17,548m2 and 176,548m2 of employment floorspace over the period 2020-2040 as informed by their HEDNA. The preferred options consultation is currently seeking views on the development strategy, draft policies and proposed sites, including at least 80 hectares of new employment land and two new proposed allocations north of Stafford and at Ladfordfields Recognised Industrial Estate.

Updated Supply of employment land

3.15 As set out at Paragraph 3.8, the EDNA (2022) identified a supply of employment land of 99ha as at April 2020, excluding West Midlands Interchange. Table 1 below sets out the stock of employment land within the district along with details of where employment land was available for employment development at the base date. This identifies around 95ha of available employment land with the remaining circa 4ha of supply coming through small windfall consents/sites under construction.

	Site Name	Parish(es)	Site Area (Ha)	Available Land for Employment Development 2020-2040 (Ha)
ent Site	Four Ashes Industrial Estate, Four Ashes (inc. Bericote)	Penkridge. Brewood & Coven	72.0	0.0
Ĭ	Hilton Cross Business Park	Featherstone	18.0	*4.8
<u>6</u>	ROF Featherstone.	Featherstone	36.0	36.0
Strategic Employment Site	West Midlands Interchange	Penkridge. Brewood & Coven	297.0	**232.5 (excluding green infrastructure)
tra	i54, Wobaston Road	Bilbrook	90.5	4.8
Ś	I54 Western Extension	Bilbrook	40.0	40.0
	Acton Gate	Dunston	13.7	0.0
	Acton Plaza	Dunston	0.8	0.8
	Balliol Business Park	Bilbrook	6.6	0.0
	Coppice Lane, Cheslyn Hay	Cheslyn Hay	7.3	0.0
	Dunston Business Village	Dunston	2.1	0.0
o o	Essington Light Industrial Estate	Essington	0.8	0.0
Sit	Hawkins Drive Industrial Estate	Cheslyn Hay	12.0	0.0
yment	Hepworth Site, Warstones Road	Essington	3.8	0.0
Allocated Employment Site	Heathmill Road Industrial Estate	Wombourne	19.3	1.0
D D	Hilton Main Industrial Estate	Featherstone	7.1	0.0
cate	Vernon Park	Featherstone	5.7	2.8
ĕ	Hobnock Road, Essington	Essington	5.2	5.2
⋖	Huntington Industrial Estate	Huntington	1.1	0.0
	Kingswood Business Park	Perton	1.0	0.0
	Landywood Enterprise Park	Great Wyrley	3.4	0.0
	Landywood Lane Industrial Estate	Cheslyn Hay	6.5	0.0
	Littleton Business Park	Huntington	2.7	0.0
	Loades plc., Gorsey Lane	Great Wyrley	1.1	0.0

Owens Trading Estate	Bilbrook	7.1	0.0
Paradise Lane, Slade Heath	Featherstone	3.1	0.0
Former Sandvik Site, Brinsford	Featherstone	2.2	0.0
Smestow Bridge Industrial	Wombourne	21.1	0.0
Estate			
Wolverhampton Business	Bobbington	1.7	0.0
Airport			
Wombourne Enterprise Park	Wombourne	3.9	0.0
		TOTAL	327.9
		less	
		WMI	95.4

^{*}this remaining available land has been granted employment permission but yet to be implemented (20/01078/FUL).

Table 1: South Staffordshire Employment stock April 2020

^{**18.8}ha of site required to meet South Staffordshire's labour demand

4. Employment Options & Assessment

Sites for assessment

- 4.1. This assessment paper assesses site options for employment land utilising a consistent methodology set out in this chapter. Site options assessed include new site suggestions that have been suggested through the Call for Sites process. In addition, this paper assesses sites with available land and without full planning permission or lawful use certificate (as at April 2020) in order to determine if they are still suitable for employment development and therefore need to be reallocated through the new Local Plan. These site options for reassessment are:
 - E14: Vernon Park 2.8ha
 - E20: Hilton Cross 4.8ha
 - E18: ROF Featherstone 36.ha
 - E24: i54 4.8ha
 - E44: I54 Western Extension (northern section) -16.7ha
- 4.2. In addition, there are 28 new site suggestions that are all either within the Green Belt or land designated as Open Countryside as follows:
 - E04: Land at Dunston Business Village 3.6ha
 - E30: Land south of Junction 13 of the M6 75ha
 - E31: Land to the east of Paradise Lane, Slade Heath 2.61ha
 - E32: Land east of Four Ashes 9.96ha
 - E33: West Midlands Interchange, Four Ashes 297ha
 - E37: Land between ROF Featherstone and the A449 63.9ha
 - E38: Land south of Moseley Road: 21.95ha
 - E41: Land north of Bognop Road: 33.4ha
 - E42: Former Severn Trent works, Wedges Mills: 6.7ha
 - E43: Land at Junction 11 of Hilton Park: 89.2ha
 - E45: Land to the north of i54/M54: 14.2ha
 - E46: Aspley Farm land south of Four Ashes: 52.26ha
 - E47: Land at Middlehill Farm (site A): 17.11ha
 - E48: Land at Middlehill Farm (site B): 3.79ha
 - E49: Land at Middlehill Farm (site C): 3.3ha
 - E50: Land at M6 Toll, Cheslyn Hay: 2.76ha
 - E51a: Extension to Bericote Four Ashes (site a): 6.96ha
 - E51b: Extension to Bericote Four Ashes (site b): 1.92ha

- E52: Land at Laney Green: 17.7ha
- E53: Land at Upper Pendeford Farm, Bilbrook: 35.11ha
- E54: East of Wolverhampton Rd, Wedges Mills: 36ha
- E55: Bridgnorth Rd, Sewage Works, Wombourne: 2.8ha
- E56: Land north of Wall Heath: 80.7ha
- E57: Land at Mount Pleasant, Dunston: 2.6ha
- E58: Land at Gailey Lea Farm: 87ha
- E59: Cocksparrow Lane, Huntington: 6.8ha
- E60: Land north of A5, Gailey: 35ha
- E61: Pendeford Hall Lane: 29.1ha
- 4.3. All site options subject to assessment are mapped and set out in Appendix B.

Site assessment methodology

- 4.4. 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, set out in Appendix A. This provides the Council with a consistent record of information under the following topics for each site:
 - Sustainability Appraisal Findings
 - Economic Land Availability Assessment
 - 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)
- 4.5. The approach taken to recording information under each of these topics is set out below.
- 4.6. 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
- 4.7. Within the site assessment proformas, major positive and major negative effects arising from the post-mitigation site assessments in the 2022 Sustainability Appraisal 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.
- 4.8. The Council commissioned Warwick Economics and Development to undertake an Economic Land Availability Assessment (ELAA 2020) as set out in paragraphs 3.9 and 3.10. This 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. The maximum score a site could achieve is 95. The approach for assessing sites in the ELAA 2020 has been carried forward to the assessment of existing identified employment land in the EDNA 2022 and for new site suggestions that have been suggested following the publication of the ELAA 2020 utilising a consistent methodology. The overall score for each site is reproduced in the assessment proformas at Appendix A. A breakdown of how sites score against the different criteria is set out in Appendix C.
- 4.9. 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-crowflies')
 - Location of the site and relationship to employment uses in the wider area
- 4.10. 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.
- 4.11. 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.
- 4.12. 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.
- 4.13. National policy and case-law³ 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.
- 4.14. 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. An addendum update was then completed in 2022 to ensure site E58: Land at Gailey Lea Farm, was covered by the harm assessment
- 4.15. This summarized 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

³ Calverton Parish Council v Greater Nottingham Councils & others (2015)

- Low
- Very low
- 4.16. 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.
- 4.17. 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. An addendum update was then completed in 2022 to ensure site E58: Land at Gailey Lea Farm, was covered by the landscape sensitivity assessment
- 4.18. 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
- 4.19. 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.
- 4.20. 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 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.
- 4.21. 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.
- 4.22. 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 was undertaken prior to submission of the Local Plan Review. This allows 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.
- 4.23. 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.
- 4.24. 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.)
- 4.25. In addition to the above, the Council has also sought the initial views of the Highways Authority (Staffordshire County Council) 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.
- 4.26. 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.
- 4.27. 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.
- 4.28. These are noted in the proforma where relevant⁴, so that they can inform the relevant merits of different site options and potential policy requirements on specific sites.
- 4.29. 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

⁴ 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 Publication Plan.
- 5.2. The Council's objectively assessed need for employment land for the period 2020-40, based on the EDNA (2022) findings, is 63.6ha, and South Staffordshire has sufficient supply of employment land to meet these needs over plan period. Across the wider South Staffordshire FEMA, Stafford Borough have indicated that they are planning to meet their own needs through their emerging Local Plan. Meanwhile Cannock Chase District have indicated they are meeting their own needs with the inclusion of 10ha of WMI added to their supply. The Black Country authorities indicated a shortfall of 210ha prior to the cessation of work on the Black Country Plan is Autumn 2022. South Staffordshire have proposed to provide 103.6ha towards this shortfall as set out below.

Sites 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. The supply of employment land in South Staffordshire has increased significantly in recent years due to the consent 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 SA7 Employment allocations).
- 5.5. Through re-examining sites within the pipeline supply this assessment has confirmed that those sites that did not have full planning permission or lawful use certificate at April 2020 (at paragraph 4.1) but with available employment land all remain suitable for allocation through the Local Plan. On this basis it can be confirmed that the supply of sites considered within the supply/demand balance of the EDNA 2022 are deliverable and as such the findings of the EDNA in terms of the supply/balance and contribution of surplus strategic employment land (36ha not including WMI) hold true.
- 5.6. As such it is proposed that the following sites are available and suitable for allocation:

- E33: West Midlands Interchange 297ha (232.5ha to be removed from the Green Belt)
- E14: Vernon Park 2.8ha
- E20: Hilton Cross 4.8ha
- E18: ROF Featherstone 36.ha
- E24: i54 4.8ha
- E44: i54 Western Extension (northern part) -16.7ha
- 5.7 These allocations will mean that we can demonstrate that we can meet our own needs with a small surplus (1.5ha), plus have a minimum of 103.6ha available for strategic cross boundary unmet needs from the Black Country, as demonstrated through the supply/demand balance exercise in the EDNA 2022 (which relies on these proposed allocations as part of the supply). This 103.6ha surplus comprises of 36.6ha of surplus strategic employment land, as well as a contribution from WMI towards Black Country unmet needs of 67ha based on their 2021 Stantec report⁵. Given the size of WMI and the fact that our EDNA 2022 confirms that South Staffordshire only requires 18.8ha of the site to meet our labour demand and that other authorities within the surrounding market area have not to date indicated a need to claim a proportion of WMI, the 67ha contribution from WMI towards to Black Country is very much considered the minimum contribution available from the site. This position is reflected in the draft Statement of Common Ground (SoCG) that covers employment across the South Staffordshire FEMA.
- The assessment has therefore confirmed that with the proposed allocations at para 5.6 that South Staffordshire has sufficient pipeline of employment land to meet our own needs and make a minimum contribution towards unmet needs of the Black Country of 103.6ha. Given this substantial contribution and considering the findings of the site assessments at Appendix A, it is not considered that further allocations on land options designated Green Belt or Open Countryside are justified.

⁵ West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve?' (Stantec, Feb 2021)

Appendix A – Employment Site Assessment Proformas

Site reference	E04	Address	Land around Dunston Business Village	
Site size (ha)	3.6ha available	Proposed use	Office.	
Site selection criteria	Assessment			
SA findings	delivering employment floorspace. The full assessment of all minor a	Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the		
Economic Land Availability Assessment score	56	view.		
Policy area and access to infrastructure	The site is located within Penkridge Parish and is in open countryside adjacent (west and north) to Dunston Business Village. The existing properties on site are a mix of converted agricultural buildings and log cabin type buildings falling within the 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. • Hourly bus service runs along A449. • Nearest railway station is Penkridge at 2.7km. • Site is on an A-road and is 1.9km from M6 Junction 13			
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	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	 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 greenfield loss, while providing an extension to a well operating business centre. The site is located approximately 1.9km from J13, M6 and benefits from direct access onto the A449. 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. 			

	 Site east of the A449 partially within Mineral Safeguarding Area. Limited key constraints associated with this site other than limited loss of agricultural land, some of which may be of Grade 2 classification. LLFA comments Low risk. County Highways assessment Ok in principle - extension to existing site is feasible, A449 may need widening
Site opportunities	 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. 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. The site is in a highly accessible location as noted by previous factors. Parcel of site west of existing employment area has been part of wider approved applications – 16/00497/FUL and 17/00250/FUL.
Proposed for allocation?	No. 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, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E14	Address	Land at Vernon Park	
Site size (ha)	2.8ha	Proposed use	E(g): R&D or light industrial B2: Industrial	
Site selection criteria	Assessment			
SA findings	delivering employment floorspace The full assessment of all minor a	Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the		
Economic Land Availability Assessment score	79			
Policy area and access to infrastructure	The site is located within Essington Parish and is within the Hilton Main/Vernon Park development boundary close to Junction 1 of M54. The site is the remaining plot of land on the industrial estate. • Hourly bus service during peak hours runs along A460.			
	Site is on an A-road and	next to Junction 1 of the M	54.	
Sequential test		Site is within a development boundary and so is sequentially preferable to other Green Belt and Open Countryside site options.		
Green Belt harm	n/a			
Landscape sensitivity	n/a			
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	1 of the M54.The site is within an esta from good accessibility /	rect access onto the A460 ablished employment locatificonnections particularly to mission ref: 21/00948/FUL	on and so benefits o Wolverhampton . in April 2022.	

Site opportunities	 The site is a natural expansion within the existing industrial park The site is in a highly accessible location with close access to M54 Junction 1 and the Black Country conurbation. The site has strong defensible boundaries being well contained within the existing business park.
Proposed for allocation?	Yes. The site performs 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 or Open Countryside.
	The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for allocation

Site reference	E15a	Address	Hobnock Road, Essington.
Site size (ha)	12.3 (exc. 5.2ha already within supply due to a certificate of lawful use for B2 industrial use).	Proposed use	Essington. E(g) – Office or Light Industrial. B2 - General Industrial. B8 – Storage and Distribution
Site selection criteria	Assessment		
SA findings	Major positive effects are predict delivering employment floorspace the landscape criteria, due to the The full assessment of all minor a effects arising from the site is available.	e. Major negative effects a site's Green Belt harm. nd major positive and negaliable in the Sustainability	re predicted against ative sustainability
Economic Land Availability Assessment score	63		
Policy area and access to infrastructure	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.		
	 An hourly or better bus service operates along Hobnock Road. The nearest railway station is Bloxwich North located approx. 2.9km to the south east and outside of SSDC administrative area. 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). 		
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	High.		
Landscape sensitivity	Low.		
Impact on historic environment	HESA scores the site a green for k historic environment, indicating r although archaeological mitigation	no concerns identified, on c	current evidence,
Known site constraints	 Previous quarrying use of development. 	the site is a potential cons	traint to

Nearby residential dwellings and traveller site (east of site) are important amenity considerations. Essington Wood Ancient Woodland located immediately to the north east of the site. Eastern half of the site located within Development High Risk area as identified by the Coal Authority. The site is located within a Mineral Safeguarding Area, with the majority of site located within an area of Brick Clay. LLFA comments Mitigable concerns – at planning stage, rationalise ground levels or leave space for surface water in site layout. County Highways assessment Ok in principle subject to being limited to B8 use Site opportunities Public transport connections at Bursnips Road with links to Essington, Cannock, Cheslyn Hay and Wolverhampton. 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. Proposed for No. The site performs relatively well compared to most other site options, and allocation? 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 also a constraint. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc.

authorities, this site is not proposed for allocation.

minimum WMI contribution) available for export to the Black Country

Site reference	E18	Address	ROF Featherstone
Site size (ha)	36	Proposed use	E(g): office, light industrial and R&D B2: General Industrial B8: Storage and Distribution
Site selection criteria	Assessment		
SA findings	Major positive effects are predict delivering employment floorspa The full assessment of all minor effects arising from the site is available. South Staffordshire Local Plan Recognitions are predicted to the staffordshire sta	ce. and major positive and negrallable in the Sustainability	gative sustainability
Economic Land Availability Assessment score	76	cvicw.	
Policy area and access to infrastructure	 The site is located within Featherstone Parish to the south of HMP Featherstone & Oakwood. The site has nearby access to the A449 and Junction 2 of the M54. A regular bus service runs along the A449 at peak hours. Mixed use proposal in the Local Plan includes provisions to safeguard land for a rail based Park and Ride close to the site 		
Sequential test	Site is within a development boundary which is sequentially preferable to other site options. A large proportion of the site is also previously developed land.		
Green Belt harm	The site is not within the Green Belt.		
Landscape sensitivity	Not assessed due to being within a development boundary.		
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	 2 of the M54. The site is within an esta from good accessibility and accessibility accessibility and accessibility and accessibility accessibility accessibility and accessibility acc	irect access onto the A449 ablished employment locat connections particularly to is previously developed lar oundary. rmission ref: 20/01131/OU	ion and so benefits o Wolverhampton nd and all the site is

	- County Highways assessment No in principle objection subject to appropriate highways works / mitigation and National Highways consultation.
Site opportunities	 The site has good access to the strategic road network with the A449 and M54 nearby. Development of the site would make use of previously developed land. The site is within close proximity to other business parks (Hilton Cross and I54) which may offer supply chain opportunities for the expansion of existing businesses.
Proposed for allocation?	Yes. The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site also benefits from an outline consent (20/01131/OUT). The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation

Site reference	E20	Address	Land at Hilton Cross
Site size (ha)	4.8	Proposed use	E(g): office, light industrial and R&D B2: General Industrial B8: Storage and Distribution
Site selection criteria	Assessment		
SA findings	Major positive effects are predict delivering employment floorspace. The full assessment of all minor a effects arising from the site is available.	e. and major positive and nega ailable in the Sustainability	ative sustainability
	South Staffordshire Local Plan Re	view.	
Economic Land Availability Assessment score	83		
Policy area and access to infrastructure	The site is located within Essington Parish and is within the Hilton Cross development boundary close to Junction 1 of M54. The site is the remaining available land on the industrial estate. Hourly bus service during peak hours runs along A460. Site is on an A-road and next to Junction 1 of the M54.		
Sequential test	Site is within a development boundary which is sequentially preferable to other site options.		
Green Belt harm	The site is entirely located within	a development boundary.	
Landscape sensitivity	N/A - The site is within a development boundary.		
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	 The site benefits from did 1 of the M54. The site is within an esta from good accessibility / The site was granted per nearing completion. 	rect access onto the A460 a blished employment location connections particularly to mission ref: 20/01078/FUL d and tree preservation or	on and so benefits Wolverhampton in August 2021 and is

	County Highways assessment		
	No in principle objections.		
Site opportunities	 The site is a natural expansion within the existing industrial park could result in opportunities for the expansion of existing businesses or bring in new businesses to the area. The site is in a highly accessible location. Both parcels are well contained within existing defensible boundaries 		
Proposed for allocation?	Yes. The site benefits from detailed planning permission (20/01078/FUL) and is nearing completion. The site performs very well and is one the districts strategic employment sites and is not in the Green Belt or Open Countryside. The site was already factored into the supply/demand balance in the EDNA 2022 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for re-allocation		

Site reference	E24	Address	154	
Site size (ha)	4.8	Proposed use	E(g): office, light industrial and R&D B2: General Industrial	
Site selection criteria	Assessment			
SA findings	Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.			
Economic Land Availability Assessment score	86			
Policy area and access to infrastructure	The site is contained within the existing i54 business park and therefore benefits from the existing infrastructure as well as nearby access to the A449 and Junction 2 of the M54. • Frequent bus service runs along the Woolaston Road • Site direct links onto Junction 2a of the M54 • Available plot within existing strategic employment site			
Sequential test	The Site is within a Development Boundary which is sequentially preferable to other open countryside or Green Belt site options.			
Green Belt harm Landscape sensitivity	N/A N/A – the site is within a development boundary.			
Impact on historic environment	The current planning application environment	considers impacts upon the	e historic	
Known site constraints	 The site benefits from historic outline permission (05/01311/OUT), with a more recent reserved matters application submitted for a large proportion of the site (22/00700/REM) which is pending determination. The site is within the existing I54 business park and therefore offers suitable opportunities for expansion within this area. 			
	LLFA comments -			
	County Highways assessment The current Planning application considers highway issues.			

Site opportunities	 The site forms part of the I54 business park and will offer suitable opportunities for further growth of the business park for existing or new businesses. The site has good access to the strategic highway network. The site benefits from outline planning permission with a proportion of the site subject to a reserved matters application which is pending determination. The site is well contained within the business park with existing defensible boundaries. 		
Proposed for	Yes. The site performs very well and is one the districts strategic employment		
allocation?	sites and is not in the Green Belt or Open Countryside. The site also benefits from a previous outline consent (05/01311/OUT).		
	The site was already factored into the supply/demand balance in the EDNA 2022		
	and this assessment has confirmed that there are no showstopper precluding the		
	site from development and as such the site is proposed for re-allocation		

Site reference	E30	Address	Land south of J13, M6.	
Site size (ha)	75	Proposed use	B2 – General Industrial. B8 – Storage & Distribution.	
Site selection criteria	Assessment			
SA findings	Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.			
Economic Land Availability Assessment score	58			
Policy area and access to infrastructure	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 site is intersected by the West Coast Mainline. Site is located on the opposite side of the M6 from Acton Gate Employment Site. • An hourly or better bus service operates along A449 with bus stop located within boundary of site. • The nearest railway station is Penkridge railway station located 4.3km south of the site. • The site is located immediately adjacent J13, M6 and A449.			
Sequential test	Site is designated Open Countryside which is sequentially preferable to other Green Belt site options.			
Green Belt harm Landscape sensitivity	The site is entirely located within the Open Countryside. 47.84ha – low – moderate (east of WCML). 23.88ha – moderate (west of WCML).			
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	 further expansion of the Western part of the site within Flood Zone 3 6 Public Right of Ways in Roughly eastern two-th Area. Dunston village to the s 	has no clear route of acces	Aineral Safeguarding	

	LLFA comments Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse. County Highways assessment Ok in principle subject to significant highways works and National Highways consultation
Site opportunities	 Six PROWs intersect the site. 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. 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. Potential direct access to the motorway network and A449 makes the site extremely accessible to workforce.
Proposed for allocation?	No. 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, Staffordshire County Council highways team have expressed some initial concerns relating to site access and the significant highways works that would likely be required. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E31	Address	Land east of Paradise Lane, Slade Heath
Site size (ha)	2.6	Proposed use	B2 – General Industrial B8 – Storage or Distribution
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	54		
Policy area and access to infrastructure Sequential test	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. 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). • Nearest bus stop served by hourly or better bus service is located 1.3km west at the edge of Coven. • 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. • 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. The site is in the Green Belt and therefore is not a sequentially preferable		
	location.	1	, p
Green Belt harm Landscape sensitivity	Moderate – high. 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.		

F			
Known site	The site is adjacent to a residential dwelling (north east of site) and could		
constraints	create residential amenity issues.		
	New Road provides good access from both a pedestrian and vehicular		
	access and links the site directly to Featherstone.		
	LLFA comments		
	Low risk.		
	Country Highway a consequent		
	County Highways assessment		
	Initial concerns due to impacts on A460		
Site opportunities	The prison to the south and employment site to the west has had an		
	urbanising influence in the area.		
	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.		
	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.		
	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).		
	 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.		
	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.		
Proposed for	No. The site performs relatively well and has the advantage of being very well		
allocation?	contained and close to other commercial activity. However, major negative		
anocation:	effects are predicted in the Sustainability Appraisal, due to the site being in one		
	of the more harmful Green Belt areas within the district.		
	of the more narmar Green beit areas within the district.		
	Fruithaumana tha gunnlu/damand balana-in the FDNA 2022 in disease that Could		
	Furthermore, the supply/demand balance in the EDNA 2022 indicates that South		
	Staffordshire's local needs can be met and that there is a 36ha surplus of		
	strategic employment land available for cross boundary unmet needs increasing		
	further when factoring in available supply at WMI. Considering the assessment		
	undertaken on this site, and the significant contribution of 103.6ha (inc.		
	minimum WMI contribution) available for export to the Black Country		
	authorities, this site is not proposed for allocation.		

Site reference	E32	Address	Land east of Four Ashes (proposed extension).
Site size (ha)	9.96	Proposed use	E(g) – R&D / Light Industrial. B2 – General Industrial B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	61		
Policy area and access to infrastructure	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).		
	 Site is immediately adjacent to Four Ashes Strategic Employment Site. Nearest bus stop served by service with frequency of at least one per hour is located 1.1km west of site on A449. Nearest A-road junction is 1.0km west of site (A449 / Station Drive / Four Ashes Road crossroads). 		of at least one per
Sequential test	 Nearest motorway junction is 3.4km north east of site (J12, M6). 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	Biological Importance alt the wider strategic emplo abuts the Canal Conserva	st boundary of the site is F hough this runs along the s syment site. The northern b tion Area and Calf Heath B ignations run adjacent to t ent site.	outhern boundary of coundary of the site ridge Biodiversity

	 Deepmore Lane is considered unsuitable for access provision. Potential new access route may be compromised by sustainable urban drainage pool for VEOLIA facility. Potential issues with land remediation / abnormal development costs due to previous quarrying practices prior to agricultural use. Majority of site (approximately southern two-thirds) is located within Mineral Safeguarding Area. LLFA comments Low risk.
	County Highways assessment Initial concerns with access to the site
Site opportunities	 Canal towpath runs adjacent to the north of the site to provide cycle connectivity opportunities. 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. The site would function as an extension to existing strategic employment site. This spatial context also means that access to workforce should raise no issues.
Proposed for allocation?	No. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E33	Address	West Midlands	
Site size (ha)	297	Proposed use	Interchange B8 – Storage or	
		'	Distribution .	
Site selection criteria	Assessment			
SA findings	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.			
	effects arising from the site is ava	The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	77			
Policy area and access to infrastructure	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. 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. Nearest bus stop served by service with frequency of at least one per hour is located adjacent the western boundary of site along A449. Penkridge railway station provides the closest passenger service. Both the Gravelly Way / Crateford Lane / A449 crossroads and A5 / A449 roundabout junction are adjacent the site. Nearest motorway junction is adjacent the north east boundary of site as			
Sequential test	J12, M6. The site is in the Green Belt and t location. However, it does benefitherefore the suitability of B8 log principle.	t from a consent through t	he DCO process and	
Green Belt harm	Moderate – High.			
Landscape sensitivity	Low – Moderate.			
Impact on historic environment	HESA scores the site an amber fo historic environment, indicating r or are at present predicted.	·		

Known site constraints	 Site of Biological Importance located adjacent to the north east corner of the site whilst Canal Conservation Area runs directly though the site north to south.
	 Majority of the western and northern end of the site are located within a Mineral Safeguarding Area.
	LLFA comments Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.
	County Highways assessment Ok in principle - site has previous consent through DCO process with associated modelling and mitigation
Site opportunities	 Canal towpath runs through the site to provide cycle connectivity opportunities.
	The site has excellent connections to both the A5 and A449 which provide well-lit pedestrian footpaths in all directions away from the site.
	 Public Right of Way (Penkridge 29) exists in the north west corner of the site.
	 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.
	 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.
	 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.
Proposed for allocation?	Yes. The principle of the development is already established through the DCO process and the site scores significantly better than other new 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.

Site reference	E37	Address	Land between ROF Featherstone and
			A449.
Site size (ha)	63.9	Proposed use	E(g) – Office, R&D or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	57		
Policy area and access to infrastructure	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). 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. 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. • The site is located adjacent A449 for part of its western boundary which hosts an hourly or better bus service. • 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. • The A449 is located adjacent the western boundary of the site whilst J2,		
Sequential test	M54 is located approximately 0.5km south. The site is in the Green Belt and therefore is not a sequentially preferable location.		Illy preferable
Green Belt harm	Northern half of site – High. Southern half of the site (56.5ha) – very 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	 Central 'belt' of the site located within Flood Zones 2 and 3. Barriers to site acting as effective extension to ROF Featherstone due to WCML separating the sites. Southern third of site located within Mineral Safeguarding Area. Canal Conservation Area is located adjacent site along the north west boundary. LLFA comments Northern part of site: mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding. Southern part of site: mitigable concerns – at planning stage, rationalise ground
	levels or leave space for surface water in site layout. County Highways assessment Ok in principle - subject to National Highways consultation and avoidance of discharging employment traffic onto Cat & Kittens Lane.
Site opportunities	 Canal towpath located adjacent part of western boundary of site to potentially provide cycle connectivity opportunity. Brewood and Coven 0.915a and b Public Right of Way located adjacent northwest boundary of site. 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 strong 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 buffer to the M54 J2 eastbound slip road. Site promotor is targeting residential development and employment land is a secondary / ancillary option following a residential-led scheme. 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 more attractive to the market. Potential supply-chain opportunities with i54 occupiers. Site is readily available from Stafford Lane and due to proximity of Wolverhampton / West Midlands conurbation access to workforce is not considered an issue.

Proposed for allocation?

No. 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.

Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E38	Address	Land south of Moseley Road.	
Site size (ha)	21.95	Proposed use	E(g) – Office, R&D or Light Industrial.	
Site selection criteria	Assessment			
SA findings	delivering employment floorspace the landscape criteria, due to the The full assessment of all minor a	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the		
Economic Land Availability Assessment score	57			
Policy area and access to infrastructure	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 2022). 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. Bus stop with hourly or better service located adjacent the site along A460 / Cannock Road. The nearest motorway junction is J1, M4 located 0.8km north of the site.			
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.	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	towers located between area. EDNA2 notes the sloping development. Potential conflict with re of the site. (Woods north of) Wester	at its north east corner wit 30 and 100 meters north of topography may limit the esidential amenity towards roft Biodiversity Alert Site capproximately 35,400m ² .	of the existing sales extent of any the south east corner	

	 A460 / Cannock Road provides site with immediate access to well-lit pedestrian footway. Entire site is located within Mineral Safeguarding Area. TPOs situated in an area to the North East of site <u>LLFA comments</u> Low risk. <u>County Highways assessment</u>
	Initial concerns due to impacts on A460 to north of site.
Site opportunities	 Bridleway / Byway runs along southern boundary of site facilitating cycle connectivity. This is also Essington 31 Public Right of Way. 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. A small area of the site is brownfield. Approximately 3,500m² which is existing small business operation. 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. EDNA2 noted that access and infrastructure routes would likely need to be improved to facilitate larger vehicles.
Proposed for	No. The site performs relatively well and has the advantage of being located
allocation?	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.
	Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E41	Address	Land north of
Site reference		71001 033	Bognop Road.
Site size (ha)	33.4	Proposed use	E(g) – Office, R&D or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are pred delivering employment floorspective landscape criteria, due to the landscape criteria, due to the full assessment of all mind effects arising from the site is a South Staffordshire Local Plan	ace. Major negative effects he site's Green Belt harm. Ir and major positive and ne available in the Sustainabilit	are predicted against gative sustainability
Economic Land	60		
Availability			
Assessment score	The search of the site is becaused	2012 - 100 B - 201 - 100 -	
Policy area and access to	The north of the site is located within Hilton Parish whilst the southern part of		
infrastructure	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.		
	approximately 0.3km vAlthough located adjace	h hosts an hourly or better by west of the site along A460 (cent J1, M54, there is a 1.0k n, and approximately 0.2km	Cannock Road. m travel distance to
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 historic environment, indicating although archaeological mitigation.	g no concerns identified, or	current evidence,
Known site constraints	woodland and pools so • EDNA2 identifies listed	y been used as a quarry and o site will incur remediation I windmill and monument w	costs.
	barrier to developmen	t.	

 There is no clear and obvious pedestrian direct access to the site as Bognop Road has no footpaths or lighting.
 Entire site located within a Mineral Safeguarding Area.

LLFA comments

Mitigable concerns – at planning stage, rationalise ground levels or leave space for SW in site layout.

County Highways assessment

Initial concerns due to impacts on A460

Site opportunities

- The terminus of Essington 2 Public Right of Way joins Bognop Road towards the south eastern corner of the site.
- 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.
- EDNA2 identified this site has holding potential for Vernon Park expansion with access through said employment area.
- Due to its scale, the site is attractive to the market subject to ground conditions and remediation costs upon viability.
- Site is well connected to existing strategic transport network and has direct access to Wolverhampton to source workforce.

Proposed for development

No. 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.

Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E42	Address	Former Severn Trent works, Wedges Mills.
Site size (ha)	6.7	Proposed use	E(g) – Office or Light Industrial.
			B2 – General Industrial.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability		
	effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	Th site was deemed unsuitable in the EDNA2		
Policy area and access to infrastructure	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.		
	 Nearest bus stop which host an hourly or better bus service is located approx. 1.7km south east of the site along Walkmill Lane. 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. 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. 		
Sequential test	The site is a Previously Developed	d Land site in the Green Bel	t.
Green Belt harm	High.		
Landscape sensitivity	Low – moderate.		

Impact on historic	HESA scores the site a green for both direct and indirect potential harm to the
environment	historic environment, indicating no concerns identified, on current evidence,
V sit s	although archaeological mitigation measures may be required.
Known site constraints	 The site is a former sewage works which would require remediation and impinge upon viability. 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. Central portion of the of the site is located within Flood Zones 2 and 3. No direct access to the site from an illuminated footway. Site is not particularly attractive to the market due to being set back from the highway. Majority of the site is within an area of high habitat distinctiveness, which the NRN mapping indicates should be avoided for development
	 Site is located within a Brick Clay Mineral Safeguarding Area. Clusters of TPOs along the Western boundary of site. LLFA comments Mitigable concerns – Flood Risk Assessment recommended at planning stage to
	investigate possible watercourse. County Highways assessment
	Significant highways concerns due to access restraints
Site opportunities	 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.
	 Local supply of workforce is expected to be strong due to be located on the edge of Cannock.
Proposed for allocation	No. 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.
	Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc.

minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E43	Address	Land at J11 M6, Hilton Park.
Site size (ha)	99ha	Proposed use	E(g) – Office, R&D or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are pred delivering employment floorsp the landscape criteria, due to to the full assessment of all mino effects arising from the site is a South Staffordshire Local Plan I	ace. Major negative effects he site's Green Belt harm. r and major positive and neg vailable in the Sustainability	are predicted against gative sustainability
Economic Land Availability Assessment score	53		
Policy area and access to infrastructure	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. • Nearest bus stop which hosts an hourly or better bus service is located adjacent the western boundary of the site along the A460.		
Sequential test	The site is adjacent both the A460 and J11, M6. The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm Landscape sensitivity	High. 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	 eastern half development HGV access and direct Brookfield Farm Site of northern third of the si Flood Zones 2 + 3 locat The Hag Biodiversity Al 	Id cuts through the site and ent. Not aided by Hilton Lan access to link road considered Biological Importance locate. Ed across part of the northed ert Site located within the seedestrian accessibility from	e being unsuitable for ed problematic. ed across part of the ern third of the site. ite.

- Vast majority of the site located within a Mineral Safeguarding Area (with the exception of south east corner).
- Large area of TPOs to North East of site

LLFA comments

Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.

County Highways assessment

Presuming this site would come forward post the M54 link road opening, SCC would not support HGV access via Hilton Lane or any other side roads and HGV's would only be able to access the site via the A460 north of its junction with Church Road.

Potential for access via the northern part of the A460 but would need to ensure National Highways are okay with the extra traffic on their network, primarily around Junction 11, as this is where the impact will be

Site opportunities

- A number of Public Right of Ways intersect the site.
- 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.
- The scale of the site gives it the potential to be strategic in nature.
- 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.
- Supply chain opportunities exist relating to the proximity of the site to all of i54, ROF Featherstone, Hilton Cross and Four Ashes.
- Site is highly accessible and so access to workforce is not considered to be an issue.

Proposed for allocation

No. 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 potential concerns about the impact of loading traffic back onto the A460, something the M54/M6 link road is designed to alleviate.

Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E44	Address	I54 western
			extension (north)
Site size (ha)	16.7ha	Proposed use	E(g) – Office, R&D
			or Light Industrial.
			B2 – General
Site selection	Assessment		Industrial.
criteria	Assessment		
SA findings	Major positive effects are predic delivering employment floorspace		iteria due to the site
	The full assessment of all minor a	and major positive and neg	ative sustainability
	effects arising from the site is av	ailable in the Sustainability	Appraisal of the
	South Staffordshire Local Plan Re	eview.	
Economic Land	82		
Availability			
Assessment score			
Policy area and	The site will form an extension to	• •	
access to	extension) and benefits from the	_	vell as nearby access
infrastructure	to the A449 and direct access on	to Junction 2a of the M54.	
	At least be which as a suri		lawa tha Mahastau
	 At least hourly bus services during peak hours run along the Wobaston Road and A449 into Wolverhampton. 		
Sequential test	Site is within a development boundary which is sequentially preferable to other Green Belt and open countryside site options.		
Green Belt harm	N/A		
Landscape	N/A – the site is within a development boundary.		
sensitivity			
Impact on historic	HESA scores the site an amber fo	or direct potential harm to t	he historic
environment	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	•	•
	although archaeological mitigation measures may be required.		
Known site	The site is in Bilbrook Parish and	will form an extension to t	he I54 business park
constraints	and benefits from the existing infrastructure as well as nearby access to the A449		
	and Junction 2a of the M54.		
	LLFA comments		
	-		
	County Highways assessment		
	No in principle objection.		
	pp. z wjestie		

Site opportunities	 The site would form an extension of I54 business park and will offer suitable opportunities for further growth of the business park, including supply chain opportunities due to proximity to other strategic employment sites The site has good access to the strategic highway network. Cycle way and good pedestrian connectivity along the Wobaston Road The site is well contained benefiting from existing defensible boundaries. Site is highly accessible and so access to workforce is not considered to be an issue. 	
Proposed for	Yes. The site performs very well and is one the districts strategic employment	
allocation?	sites and is not in the Green Belt or Open Countryside.	
	The site was already factored into the supply/demand balance in the EDNA 2022	
	and this assessment has confirmed that there are no showstopper precluding the	
	site from development and as such the site is proposed for re-allocation.	

Site reference	E45	Address	Land north of i54 / M54.
Site size (ha)	14.2	Proposed use	E(g) – Offices, R&D or Light Industrial. B2 – General Industrial.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability		
	effects arising from the site is a South Staffordshire Local Plan R	-	Appraisar of the
Economic Land Availability Assessment score	61		
Policy area and access to infrastructure	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.		
	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.		
	 The nearest bus stop which hosts an hourly or better bus service is located approx. 0.6km south of the site along Innovation Drive. 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. The site sits immediately adjacent J2, M54 eastbound exit. Approx. 0.6km east of the site is both the westbound exit and A449. 		
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	 The site is located adjacent operational sewage works which may render the site unattractive. Site is slightly sloped in topography and includes wooded area in its eastern half. Waterhead Brook dissects the site, with Flood Zones 2 + 3, limiting development potential. 		

	 Staffordshire and Worcestershire Canal Green Corridor Open Space and Canal Conservation Area adjacent to the eastern boundary of the site. Pedestrian accessibility would need to be formulated as footpath only presently exist south of the M54. Entire site located within a Mineral Safeguarding Area. LLFA comments Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate possible watercourse. County Highways assessment Ok in principle - no concerns from Highways Authority, but consultation with National Highways required.
Site opportunities	 Cycle connectivity to the site provided by Bridleway along canal. 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. 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. 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. 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.
Proposed for allocation	No. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E46	Address	Aspley Farm, south
Sito sizo (ha)	52.26	Dranged use	of Four Ashes.
Site size (ha)	52.26	Proposed use	E(g) – Office or Light Industrial.
			B2 – General
			Industrial.
			B8 – Storage or
			Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are predic	ted against the economy cr	iteria due to the site
	delivering employment floorspace	•	re predicted against
	the landscape criteria, due to the	e site's Green Belt harm.	
	The full assessment of all minor a	and major positive and neg	ative sustainability
	effects arising from the site is ava		Appraisal of the
	South Staffordshire Local Plan Re		
Economic Land	The site was deemed unsuitable	in the EDNA2	
Assessment			
Assessment score Policy area and	The site is largely located within	Brewood and Coven Parish	with the eastern
access to	The site is largely located within Brewood and Coven Parish, with the eastern quarter located within Shareshill Parish just south of the existing Four Ashes		
infrastructure	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.		
	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.		
	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.		
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	HESA scores the site an amber fo	r both direct and indirect n	otential harm to the
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	West Coast Mainline adjoining the western boundary of the site restricts		
constraints	access to the site.		
	 Access through Four Ashes challenging due to crossing Saredon Brook and wooded area. 		
		small in access terms – pro	_
	and visibility obstacles. Northern edge and south east tip of site located		
	within Flood Zone 3.		

- Land at Four Ashes Local Wildlife Site located immediately adjacent the northern edge of the site. No immediately obvious pedestrian access to the site.
- Entire site located within a Mineral Safeguarding Area.
- 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.

LLFA comments

Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.

County Highways assessment

Significant highways concerns due to lack of access

Site opportunities

- Cycle connectivity to the site provided by Bridleway / Byway located adjacent the south east site boundary.
- Shareshill 19 Public Right of Way runs adjacent the south east site boundary.
- 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.
- 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.
- Due to proximity to Four Ashes employment area, the site is considered both attractive to the market and accessible to workforce.
- 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.

Proposed for allocation

No. 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.

Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment

undertaken on this site, and the significant contribution of 103.6ha (inc.
minimum WMI contribution) available for export to the Black Country
authorities, this site is not proposed for allocation.

Site reference	E47	Address	Land at Middlehill
			Farm (Site A).
Site size (ha)	17.11	Proposed use	E(g) – Office or Light
			Industrial.
			B2 – General
			Industrial.
			B8 – Storage or
Cita and anti-m	A		Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are predic	cted against the economy co	riteria due to the site
	delivering employment floorspa	-	are predicted against
	the landscape criteria, due to th	e site's Green Belt harm.	
	The full assessment of all minor	and major positive and neg	ative sustainability
	effects arising from the site is av	ailable in the Sustainability	Appraisal of the
	South Staffordshire Local Plan R	eview.	
Economic Land	50		
Availability			
Assessment score			
Policy area and	The site is located within Saredo	_	
access to	equidistant from existing employment sites both within and outside of South		
infrastructure	Staffordshire administrative are		
	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.		
	of the site sits flawkins brive industrial estate strategic employment site.		
	The nearest bus stops which hosts an hourly or better bus service is		
	located approx. 2.6km north east along Delta Way.		
	The nearest railway station is Landywood, located approx. 3.7km south		
	east of the site.		
	-	on runs adjacent the easter	· ·
		II is located approx. 0.2km s	south of the site. J11,
Commential took	M6 is located approx. 1.		alle constantial a
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable		
Green Belt harm	location. High.		
Landscape	Moderate.		
sensitivity			
Impact on historic	HESA scores the site an amber for	or direct potential harm to	the historic
environment	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 mitigati	on measures may be requir	red.
Known site	There is an electricity pylon located in the north east corner of the site		
constraints	with associated cabling crossing the site.		

	Ţ		
	 Residential amenity issues will need to be considered with development boundary adjoining site in north east corner. The site has excellent pedestrian access due to proximity of A460 Wolverhampton Road linking the site with Cannock urban area. Site is located within a Mineral Safeguarding Area, including Brick Clay. There are clusters of TPOs in the centre of the site and to the northern boundary of the site 		
	Low risk.		
	County Highways assessment Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions		
Site opportunities	 Site is flat in topography. Access to site should be relatively straightforward. The site is well connected to the strategic road network. 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 Saredon Wolverhampton and the southern boundaries are not as strong as they are both defined by tree-lines with open fields beyond. The site is attractive to the market due to its strategic size and location. As such, the EDNA2 predicts high interest from developers and occupiers alike. Due to the proximity of the site from Cannock, accessing workforce is not considered to be an issue. 		
Proposed for allocation	No. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.		

Site reference	E48	Address	Land at Middlehill Farm (Site B).
Site size (ha)	3.79	Proposed use	E(g) – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are pred delivering employment floorsp the landscape criteria, due to to the full assessment of all mino effects arising from the site is a South Staffordshire Local Plan	ace. Major negative effects a he site's Green Belt harm. r and major positive and neg available in the Sustainability	are predicted against
Economic Land Availability Assessment score	42		
Policy area and access to infrastructure	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.		
	 The nearest bus stop which hosts a regular bus service is located approx. 3.5km east of the site along Coppice Lane. 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. 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. 		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm Landscape sensitivity	Very High. 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	amenity considerationSite has potentially exc which provides lighted	I dwellings to the south east s. cellent access to A4601 Wolv pedestrian access to Wedge Brick Clay Mineral Safeguard	erhampton Road s Mills and Cannock.

	LLFA comments Low risk.		
	County Highways assessment Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions		
Site opportunities	 Cycle path located at the south east corner of the site. Saredon17 Public Right of Way is located from the centre of the site running east to the A460 (connecting to the cycle path). 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. 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. 		
Proposed for allocation	No. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.		

Site reference	E49	Address	Land at Middlehill
Site size (ha)	3.3	Proposed use	Farm (Site C). E(g) – Office or Light Industrial. B2 – General Industrial. B8 – Storage or
Site selection	Assessment		Distribution.
criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	52		
Policy area and access to infrastructure	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. • The nearest bus stop which hosts a regular bus service is located approx. 0.8km south east of the site along Wolverhampton Road. • The nearest railway station is Landywood, located approx. 2.7km south		
	 east of the site. 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. 		
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 historic environment, indicating although archaeological mitigation	no concerns identified, on	current evidence,
Known site constraints	Topography of the sightSite is located within a BTPOs situated on Wester	rick Clay Mineral Safeguard	ding Area.
	LLFA comments Mitigable concerns – Flood Risk investigate possible watercourse		at planning stage to

	County Highways assessment		
	Initial concerns due to impact on A460/A4601 roundabout and other surrounding		
	junctions		
Site opportunities	 Cheslyn Hay 3 Public Right of Way runs adjacent to southern boundary of site. 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. The site would be attractive to the market due to excellent motorway network access. Due to proximity of the site to strategic road network and Cannock, 		
2 16	access to workforce is not anticipated to be problematic.		
Proposed for allocation	No. 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 seeing in one of the more harmful Green Belt areas within the district.		
	Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.		

Site reference	E50	Address	Land at M6 Toll,
Site size (ha)	2.76	Proposed use	Cheslyn Hay E(g) – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Feenensialand		ii keview.	
Economic Land Availability Assessment score	58		
Policy area and	The site is located within Che	eslyn Hay Parish on the ed	ge of Cannock Urban area.
access to	The site sits to the north wes		
infrastructure	Employment Site.		
	 The nearest bus stop which hosts a regular bus service is located approx. 0.8km south of the site along Wolverhampton Road. The nearest railway station is Landywood, located approx. 2.7km south east of the site. 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. 		
Sequential test	The site is in the Green Belt a location.	and therefore is not a sequ	uentially preferable
Green Belt harm	Low – Moderate.		
Landscape sensitivity	Low.		
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	 The site is currently uneven in topography and vegetated. Alternative site access is located off Saredon Road which is not in the site promotors control. No clear access to the site from Hawkins Drive Industrial Estate. Site is located within a Brick Clay Mineral Safeguarding Area. 		

	LLFA comments Low risk. County Highways assessment Significant highways concerns due to lack of suitable access
Site opportunities	 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. The site provides an opportunity for 'natural' expansion to existing employment area subject to plot accessibility. Due to the proximity of the site to motorway network and established employment area, market interest is anticipated to be high. Due to the proximity of the site to strategic road network and Cannock, access to workforce is not anticipated to be problematic.
Proposed for allocation	No. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E51a	Address	Extension to Bericote, Four Ashes (Site A).
Site size (ha)	6.96	Proposed use	E(g) – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	70		
Policy area and access to infrastructure	 The site is located within Penkridge Parish and is immediately adjacent to Four Ashes Strategic Employment Site. The nearest bus stop which hosts a regular bus service is located approx. 0.8km west of the site along A449 Stafford Road. 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. 		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm Landscape sensitivity	Moderate – High. Low – Moderate.		
Impact on historic environment Known site	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. • The site is currently a wooded area.		
constraints	 Gravelly Way which runs along the western boundary of the site provide a well-lit pedestrian access to the site from A449 Stafford Road. Majority of the site is within an area of high habitat distinctiveness, which the NRN mapping indicates should be avoided for development Site is located within a Mineral Safeguarding Area. 		tafford Road. t distinctiveness,
	LLFA comments Low risk.		
	County Highways assessment		

	Ok in principle.	
Site opportunities	 Bridle-way / Byway along canal which is located approx. 370m west of the site providing cycle provision for the site. The site provides opportunity for 'natural' extension to existing Four Ashes employment area. 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. 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. 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. Due to the location of the site adjacent to Four Ashes, the site is 	
Proposed for allocation	No. The site performs relatively well and has a clear advantage of being a log extension to an existing employment site, however it is entirely wooded and area of high habitat distinctiveness. Major negative effects are also predicted 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that S Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increated further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.	

Site reference	E51b	Address	Extension to Bericote, Four Ashes (Site B).
Site size (ha)	1.92	Proposed use	E(g) – Office or Light Industrial. B2 – General Industrial. B8 – Storage and Distribution.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	70		
Policy area and access to infrastructure	The site is located within Penkridge Parish and is immediately adjacent to Four Ashes Strategic Employment Site. • The nearest bus stop which hosts a regular bus service is located approx. 1.1km west of the site along A449 Stafford Road. • 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.		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm Landscape sensitivity	Moderate – High. 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	 The western boundary of the site runs adjacent to the canal Open Space Green Corridor and Conservation Area. If the site can effectively be connected to the wider existing Four Ashes employment area, then a well-lit pedestrian access can be facilitated. Site is located within a Mineral Safeguarding Area. 		
	LLFA comments Mitigable concerns – Flood Risk A investigate possible watercourse		at planning stage to

	County Highways assessment		
	OK in principle.		
Site opportunities	 Bridleway / Byway along canal which runs adjacent western boundary of the site providing cycle provision. The site provides opportunity for 'natural' extension to existing Four Ashes employment area. 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. 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. 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. 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. Due to the location of the site adjacent to Four Ashes, the site is attractive to the market and should easily access workforce. The site, excluding the electricity substation located in the south east corner, was included in the masterplan for approved application 16/00498/FUL. 		
Proposed for allocation	No. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.		

Site reference	E52	Address	Land at Laney	
			Green.	
Site size (ha)	17.7	Proposed use	B2 – General	
			Industrial.	
			B8 – Storage or	
Cita calaction	Accomment		Distribution.	
Site selection criteria	Assessment			
SA findings	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. The full assessment of all minor and major positive and negative sustainability		re predicted against	
	effects arising from the site is av South Staffordshire Local Plan Re	ailable in the Sustainability	•	
Economic Land Availability	46			
Assessment score				
Policy area and	The site straddles both Saredon	Parish and Cheslyn Hay Pari	ish and is located	
access to	approx. 520m south west of Hawkins Drive Industrial Estate Strategic			
infrastructure	Employment Site.			
	 The nearest bus stop which hosts a regular bus service is located approx 0.6km south of the site along Wolverhampton Road. The nearest railway station is Landywood, located approx. 2.9km east or 			
	 the site. 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. 			
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	 The site is sloped in topography. Potential conflict with residential amenity as dwellings located to the south west of the site along Wolverhampton Road. 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. Site is located within a Mineral Safeguarding Area, including an area of Brick Clay 			

	LLFA comments
	Low risk.
	County Highways assessment Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions
Site opportunities	 Cheslyn Hay 2 Public Right of Way adjoins the southern boundary of the site. 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. Due to the site location and size being strategic in nature, the site has the potential to attract a range of developers and occupiers. The proximity of both Cannock and the existing road network ensures that access to workforce is not considered to be problematic.
Proposed for allocation	No. 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.
	Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E53	Address	Upper Pendeford Farm.
Site size (ha)	35.11	Proposed use	E(g) – Office or Light Industrial. B2 – General Industrial.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the		
	South Staffordshire Local Plan Ro		
Economic Land Availability Assessment score	54		
Policy area and access to infrastructure	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.		
	 1km east of the site alor The nearest railway stat site. The south east corner of A449 Stafford Road, whithe site. 	ion is Bilbrook, located app f the site is located approx. lst J2, M54 is located appro	rox. 2.4km west of the 1.9km west of the ox. 3.5km north east of
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	 Site has sloped topograph The includes historical medical me	phy towards existing indust nonument (Pillbox) in situ. ne site abuts residential are	rial area / River Penk. a whose amenity will rox. 35m north east of

	 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. Majority of the site is located within Mineral Safeguarding Area except for approx. 0.1km² of the north eastern corner of the site. Site is not as well connected to motorway network as other sites and access could pose problems for HGVs. LLFA comments Low risk.
	County Highways assessment
Cita appartunities	Initial concerns due to impact on surrounding road network
Site opportunities	 Cycle path located along Wobaston Road. 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. 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. Site could attract multiple occupiers by servicing both industrial and office sectors and therefore is attractive to a wide variety of uses. 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.
Proposed for	No. The site performs relatively well however the sites topography and highway
allocation	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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of
	strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc.
	minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E54	Address	Land east of Wolverhampton Road.
Site size (ha)	36	Proposed use	E(g) – Office, R&D or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are predict delivering employment floorspac the landscape criteria, due to the The full assessment of all minor a effects arising from the site is available.	e. Major negative effects a site's Green Belt harm. nd major positive and negaliable in the Sustainability	re predicted against ative sustainability
Economic Land Availability Assessment score	50		
Policy area and access to infrastructure	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. • The nearest bus stop which hosts an hourly or better bus service is located adjacent the site along Wolverhampton Road. • The nearest railway station is Cannock, located approx. 3.7km north east of the site. • 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.		
Sequential test	The site is in the Green Belt and t location.	herefore is not a sequentia	ally preferable
Green Belt harm Landscape sensitivity	Very High and High Low – Moderate.		
Impact on historic environment	HESA scores the site a green for be historic environment, indicating ralthough archaeological mitigation	no concerns identified, on c	current evidence,
Known site constraints	 Potential for residential a dwellings to the west of A 	menity issues associated w 14601.	vith cluster of

- Area to the north of the site (outside site boundary) is located within Flood Zone 2 / 3.
- Site poses topographical concerns.
- SSSI located adjacent north east corner of the site.
- The site has excellent pedestrian access due to proximity of A460 Wolverhampton Road linking the site with Cannock urban area.
- Eastern point of the site marginally located within / adjacent to Coal Development High Risk Area.
- Site is located within a Brick Clay Mineral Safeguarding Area.
- There are various clusters of TPOs within the site

LLFA comments

Mitigable concerns – Flood Risk Assessment at planning stage to investigate possible watercourse.

County Highways assessment

Initial concerns due to impact on A460/A4601 roundabout and other surrounding junctions

Site opportunities

- Saredon15, Cheslyn Hay6 and Cheslyn Hay5 Public Rights of Way run east

 west across the site.
- 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.
- 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.
- The site has no known remediation issues.
- Due to the proximity of the site from Cannock, accessing workforce is not considered to be problematic.

Proposed for allocation

No. 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.

Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E55	Address	Bridgnorth Road
Site size (ha)	2.77	Proposed use	sewage works. E(g) – Office or Light Industrial. B2 – General Industrial.
Site selection criteria	Assessment		
SA findings	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. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.		
Economic Land Availability Assessment score	The site was deemed unsuitable	in the EDNA2	
Policy area and access to infrastructure	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. • The nearest bus stop which hosts an hourly or better bus service is		
	The site is located approx	ast of the site along Brickbr x. 2.7km north west of the way junction is over 15km	A449 Stourbridge
Sequential test	The site is a Previously Develope	d Land site in the Green Be	lt.
Green Belt harm Landscape sensitivity	Moderate – High. Unreviewed by Landscape Sensit built-up area alongside adjacent	•	onsidered as part of
Impact on historic environment	HESA scores the site a green for l historic environment, indicating although archaeological mitigation	no concerns identified, on on measures may be requir	current evidence, ed.
Known site constraints	 Remediation costs identified sewage works. New access infrastructure Flood zones 2 + 3 located B4176 Bridgnorth Road pato the site. 	gh the centre of the site (no ified due to the previous us re required. d in the central area of the provides well-lit pedestrian in a Mineral Safeguarding Ar	e of the site as site. and vehicular access

	Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.
	County Highways assessment Initial concerns with achieving two way access and junction with B4176
Site opportunities	 Cycle route located along B4176 Bridgnorth adjacent to the northern boundary of the site. Wombourne39 Public Right of Way runs adjacent the eastern boundary of the site. 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. The entire site is considered to be brownfield owing to its previous use as a sewage works. Neighbouring employment areas are popular commercial trading area and well occupied by large operators. The site is currently being marketed but does not appear to have an immediate buyer. Significant investment is required to bring the site into serviceable plot(s). The site is well located in a commercially active location so no anticipated problems with access to workforce.
Proposed for allocation	No. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation

Site reference	E56	Address	Land at Wall Heath.
Site size (ha)	80.66	Proposed use	E(g) – Office or Light Industrial. B2 – General Industrial. B8 – Storage or Distribution.
Site selection criteria	Assessment		
SA findings	Major positive effects are predict delivering employment floorspace the landscape criteria, due to the The full assessment of all minor a effects arising from the site is available.	ce. Major negative effects a e site's Green Belt harm. and major positive and nega ailable in the Sustainability	re predicted against ative sustainability
Economic Land Availability Assessment score	53		
Policy area and access to infrastructure	 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. The nearest bus stop which hosts a regular bus service is located adjacent the eastern boundary of the site along A449 Wolverhampton Road. The eastern boundary of the site is located adjacent A449 Wolverhampton Road, whilst J2, M5 is located over 10km south east of the site. 		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm Landscape sensitivity	Very High. Low – Moderate.		
Impact on historic environment	HESA scores the site a green for environment, indicating no concarchaeological mitigation measu an amber for indirect potential h significant effects which cannot be	erns identified, on current eres may be required. The Farm to the historic environ	evidence, although IESA scores the site ment, indicating no
Known site constraints	land.Access to the site is relia currently lined by mature	would result in a significant on bridge cutting across at tree belt. with residential dwellings r	railway walk which is

A449 Wolverhampton Road provides well-lit pedestrian access to the site. Flood Zones 2 + 3 located along south western, western, and northern boundaries of the site. Land at Himley Fields, Hinksford Farm Site of Biological Importance is located along northern boundary of the site. Kingswinford Railway Walk Biodiversity Alert Site and South Staffordshire Railway Walk Green Space / Open Corridor intersect the north east corner of the site. The site is located entirely within Mineral Safeguarding Area. Local Nature Reserve located to the north east of site. LLFA comments Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding. County Highways assessment Initial concerns due to impact on surrounding road network Site opportunities 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. Himley 5(b) and Himley 6 Public Rights of Way intesct the site in a north / south direction, Himley 7 PROW runs adjacent the western boundary of 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 filed pattern / hedge/tree rows with agricultural fields beyond. 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. Due to the site location in close proximity to Dudley urban area there is a strong employment population catchment, whilst public transport networks operate around the site. Proposed for No. The site performs relatively poorly with a number of key constraints allocation 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.

Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E57	Address	Land at Mount Pleasant, Dunston.	
Site size (ha)	2.6	Proposed use	E(g) – Office or Light Industrial.	
Site selection criteria	Assessment			
SA findings	Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.			
Economic Land Availability Assessment score	61 – site has potential to be of be	61 – site has potential to be of best quality employment land.		
Policy area and access to infrastructure	 adjacent the western both The nearest railway stating Stafford. The A449 is located adjacent 		vice is located 149. n north of the site at	
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 Sensit	ivity Assessment 2019.		
Impact on historic environment	HESA scores the site an amber for historic environment, indicating or are at present predicted.	·		
Known site constraints	 Development of the site Flood Zones 2 + 3 are loc The A449 provides a well The site is entirely locate 	ues with farm located to the would require limited loss ated along the western bo I-lit pedestrian access to the d within a Mineral Safegua	of agricultural land. undary of the site. ne site.	
Site opportunities	LLFA comments Low risk. County Highways assessment Initial concerns with achieving su The site provides a regular	itable access off A449 ar shape for development	and is well defined hy	
one opportunities	existing infrastructure. T	he A449 provides strong do oundaries of the site are le	efinition to the west of	

	 but still well defined by existing residential dwelling(s) to the north, Mill Lane to the east and deep tree line to the south. The site has potential to be extension to existing nearby successful employment areas. The site is expected to be attractive to the market as minimal abnormal development / remediation costs are envisaged. 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. Public transport network operate around the site. 		
Proposed for	No. The site performs relatively well and has a clear advantage of being close to		
allocation	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.		
	Furthermore, the supply/demand balance in the EDNA 2022 indicates that South		
	Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing		
	further when factoring in available supply at WMI. Considering the assessment		
	undertaken on this site, and the significant contribution of 103.6ha (inc.		
	minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.		

Site reference	E58	Address	Land at Gailey Lea
Site size (ha)	87	Proposed use	Farm E(g): office, light industrial and R&D B2: General Industrial B8: Storage and Distribution
Site selection criteria	Assessment		
SA findings	Major positive effects are prodelivering employment floor. The full assessment of all mireffects arising from the site is South Staffordshire Local Pla	space. nor and major positive and s available in the Sustainal	I negative sustainability
Economic Land Availability Assessment score	54	ii Neview.	
Policy area and access to infrastructure	 The site is located within Penkridge Parish and is in the Green Belt. The site is within close proximity of Junction 12 of the M6 and the A5. The nearest bus stop which hosts a regular bus service is located along the A449 approx 4.7km away The nearest railway station is located approx. 6.7km east of the site at Cannock. The site is in close proximity to the proposed West Midlands Interchange. 		
Sequential test	The site is within the Green Belt and is not previously developed land so is therefore sequentially the least preferable.		
Green Belt harm Landscape sensitivity	The site is within the Green Belt and assessed as having a very high harm rating. 'Moderate' to 'moderate-high' rating.		
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	 The site is adjacent to two SBI's (Gailey Reservoirs and Fullmoor Wood) The site borders ancient woodland to the north. Majority of the site is within an area of high habitat distinctiveness, which the NRN mapping indicates should be avoided for development LLFA comments		

	- County Highways assessment Cumulative impacts on the surrounding network would need to be assessed, including consultation with National Highways. There is also a potential lack of sustainable transport options for the site.
Site opportunities	 The site has clear distribution/logistics benefits through being close to the M6 (J12) and the West Midland Interchange proposal. The site would offer opportunities for the expansion of existing businesses or a location for new businesses within the district. The scale of the site gives it the potential to be strategic in nature. Supply chain opportunities exist relating to the proximity of the site to all of i54, ROF Featherstone, Hilton Cross and Four Ashes. The site is well contained by the M6 to the west and reservoir to the south
Proposed for allocation?	No. Site performs relatively well from a market perspective, having a clear advantage for distribution/logistics of being close to the M6 (J12) and the West Midland Interchange proposal. However, some initial concerns have been expressed by Staffordshire County Council highways team regarding cumulative impacts on the surrounding network and sustainable travel 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

Site reference	E59	Address	Land north of									
		71001000	Cocksparrow Lane									
Site size (ha)	6.8	Proposed use	E(g): office, light industrial and R&D B2: General Industrial B8: Storage and Distribution									
Site selection criteria	Assessment											
SA findings	Major positive effects are predict delivering employment floorspace the landscape criteria, due to the The full assessment of all minor a effects arising from the site is available.	ce. Major negative effects a e site's Green Belt harm. and major positive and neg ailable in the Sustainability	are predicted against									
Economic Land Availability Assessment score	47											
Policy area and access to infrastructure	The site would benefit forA regular bus service run	The site is located on the western edge of Huntington. The site would benefit from being close to the A34 (Stafford Road). A regular bus service runs along the A34. The nearest train station is around 2 miles away at Hednesford.										
Sequential test	The site is open land within the G preferable category of site.	The site is open land within the Green belt therefore sequentially the least preferable category of site.										
Green Belt harm	High											
Landscape sensitivity	Moderate											
Impact on historic environment	The site scores green for direct & environment, indicating no concearchaeological mitigation measures.	erns identified, on current										
Known site constraints	 The site adjoins an area of mapping indicates should A bridleway and public ri 	eximity to the south of the soft high habitat distinctivened be avoided for developm ghts of way runs through the with some of its boundar	ess, which the NRN ent he site.									
	<u>LLFA comments</u>											
	County Highways assessment											

	Consideration will need to be given to whether a suitable access can be provided.
Site opportunities	 The site would provide employment opportunities on the edge of Huntington, a tier 2 village. The site benefits from being close to the A34. The site would offer opportunities for the expansion of existing businesses or a location for new businesses within the district.
Proposed for allocation?	No. Site performs relatively poorly with a number of constraints identified including its proximity to a local wildlife site and an irregular shape. Some initial concerns have been expressed by Staffordshire County Council highways team with concerns that suitable access may not be achieved through the industrial estate to the south. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment
	undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

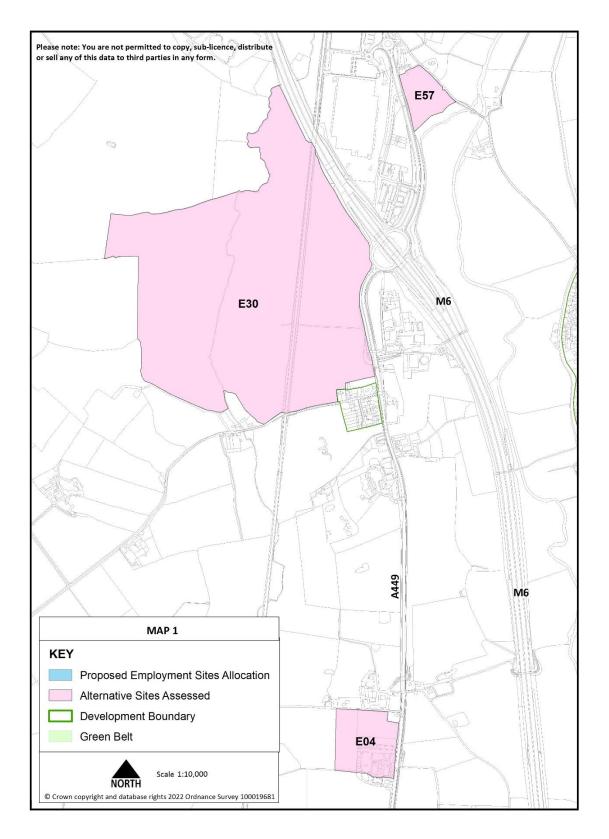
E60	Address	Land north of the										
35	Pronosed use	A5, Gailey E(g): office, light										
	11000364 436	industrial and R&D										
		B2: General										
		Industrial										
		B8: Storage and Distribution										
Assessment		Distribution										
delivering employment floorspa	ce. Major negative effects											
the landscape criteria, due to th	e site's Green Belt harm.											
The full assessment of all minor	and major positive and neg	gative sustainability										
effects arising from the site is a	vailable in the Sustainability	•										
	eview.											
56												
The site is located within Penkri	dge Parish along the A5. Th	e site has good access										
to the strategic highway networ	k being located on the A5 v	vith links onto the M6										
(at Junction 12) and A449.												
 The nearest railway station is at Penkridge which is around 2.5 miles away. The nearest bus stop with a regular service is 1km away along the A44 												
The site is opposite the proposed West Midlands Interchange site.												
Site is open land within the Gre- preferable site option.	en Belt and therefore seque	entially the least										
High												
Low – moderate												
environment and red for indirect that the proposed allocation can changing the context within wh	ct impacts. This is due to the nnot be accommodated wit ich the Canal Conservation	e degree of chance hout fundamentally Area would be										
The Canal conservation	area runs between the two	land parcels.										
LLFA comments	<u>comments</u>											
-												
	Assessment Major positive effects are predict delivering employment floorspatche landscape criteria, due to the The full assessment of all minor effects arising from the site is as South Staffordshire Local Plan R 56 The site is located within Penkrit to the strategic highway networ (at Junction 12) and A449. • The nearest railway state away. • The nearest bus stop with the site is opposite the Site is open land within the Green preferable site option. High Low — moderate HESA scores the site an amber of the environment and red for indirect that the proposed allocation can can and the proposed allocation can changing the context within white experienced, and that this predict of the Canal conservation.	Assessment Major positive effects are predicted against the economy of delivering employment floorspace. Major negative effects the landscape criteria, due to the site's Green Belt harm. The full assessment of all minor and major positive and negeffects arising from the site is available in the Sustainability South Staffordshire Local Plan Review. 56 The site is located within Penkridge Parish along the A5. The to the strategic highway network being located on the A5 of (at Junction 12) and A449. The nearest railway station is at Penkridge which is away. The rie site is opposite the proposed West Midlands In Site is open land within the Green Belt and therefore sequence preferable site option. High Low — moderate HESA scores the site an amber for direct potential harm to environment and red for indirect impacts. This is due to the that the proposed allocation cannot be accommodated with the proposed with the proposed with the proposed wit										

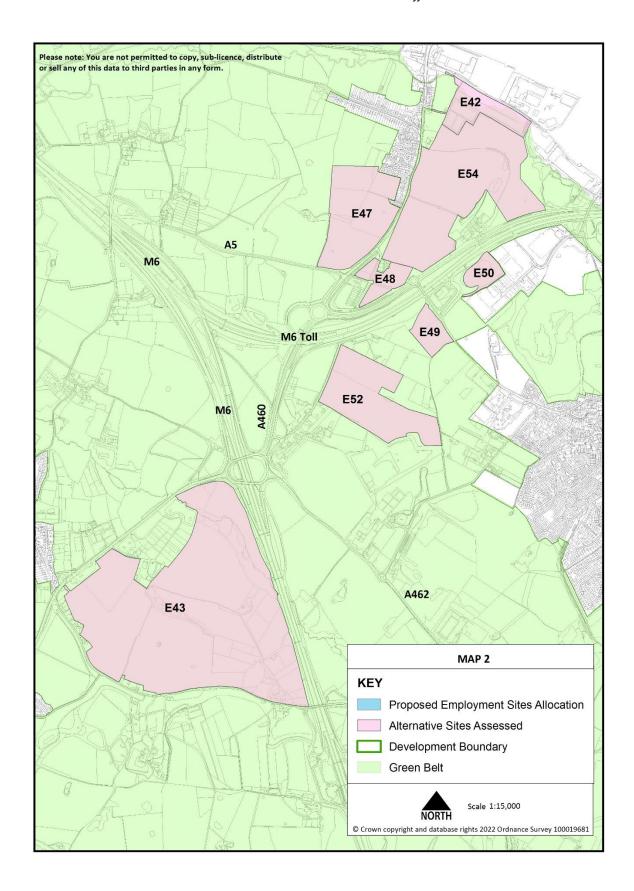
	County Highways assessment
	Consideration would need to be given to site access and well as the impacts on the surrounding highway network including cumulatively with the adjacent West Midlands Interchange. Consultation with National Highways would be required.
Site opportunities	 The site has clear distribution/logistics benefits through being close to the M6 (J12) and the West Midland Interchange proposal. The site would offer opportunities for the expansion of existing businesses or a location for new businesses within the district. The scale of the site gives it the potential to be strategic in nature. Supply chain opportunities exist relating to the proximity of the site to all of i54, ROF Featherstone, Hilton Cross and Four Ashes.
Proposed for allocation?	No. Site performs relatively well from a market perspective, having a clear advantage for distribution/logistics of being close to the M6 (J12) and the West Midland Interchange proposal. However, some initial concerns have been expressed by Staffordshire County Council highways team regarding if a suitable access is achievable and impact on the surrounding 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

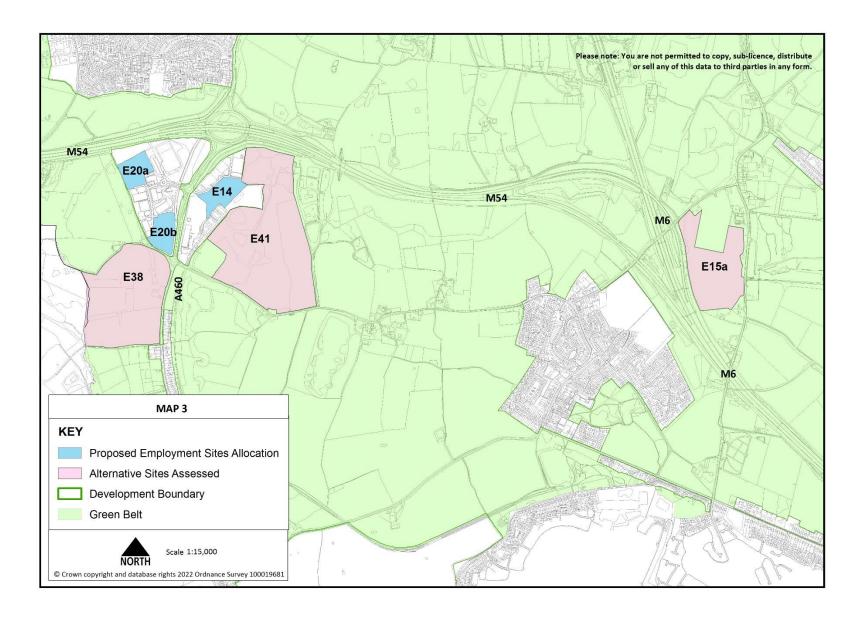
Site reference	E61	Address	Pendeford Hall Lane								
Site size (ha)	29.1	Proposed use	E(g): office, light industrial and R&D B2: General Industrial B8: Storage and Distribution								
Site selection criteria	Assessment										
SA findings	Major positive effects are predict delivering employment floorspace the landscape criteria, due to the landscape criteria of all minor a effects arising from the site is av South Staffordshire Local Plan Re	ce. Major negative effects a e site's Green Belt harm. and major positive and negaliable in the Sustainability	re predicted against ative sustainability								
Economic Land Availability Assessment score	50										
Policy area and access to infrastructure	 The site has nearby acce although sections of the access them. The site would be within although it would not lik The nearest railway stati 	 The site has nearby access to the M54 (junction 2) and the A449, although sections of the local road network would need to be used to access them. The site would be within close proximity to the I54 business park although it would not likely be functionally connected. The nearest railway station is Bilbrook approx. 3.3km away The near bus stop with a regular service is approx. 2.1km away along the 									
Sequential test	Site is greenfield land within the category of site.	Green Belt and is therefore	the least preferable								
Green Belt harm Landscape sensitivity	Very high Moderate										
Impact on historic environment	HESA scores the southern parcel indirect impact. This is because accommodated on this site with both the character and setting or Conservation Area. The northern medium for indirect impact.	it is unlikely that developmout out it resulting in an advers f the Staffordshire and Wor	ent can be e material change to cestershire Canal								
Known site constraints		s within flood zones 2 & 3. orcestershire Canal Conser	vation Area runs to								

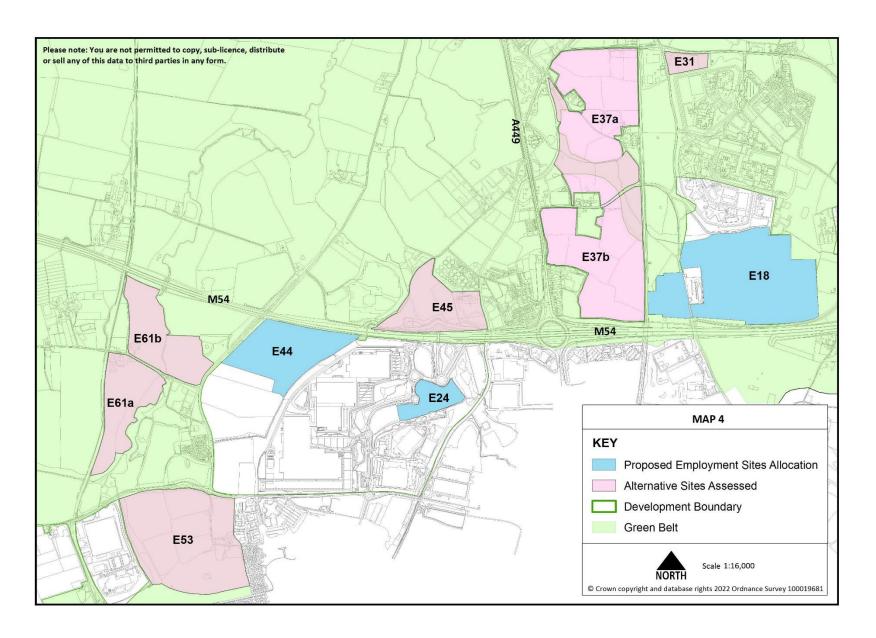
	LLFA comments - County Highways assessment There are concerns raised around potential sustainable transport options to the site as well as the potential impact upon the local highway network including surrounding junctions.
Site opportunities	 The site is relatively nearby the M54 (junction 2) and the A449. The site is also located nearby the I54 Business Park but would not likely be able to be functionally joined. The site would offer opportunities for the expansion of existing businesses or a location for new businesses within the district.
Proposed for allocation?	No. Site performs relatively poorly with a number of constraints including flood zone 2/3 running through the site. Some initial concerns have been expressed by Staffordshire County Council highways team with concerns around lack of bus, pedestrian and cycle connectivity and impact on surrounding junctions. 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. Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire's local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (inc. minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.

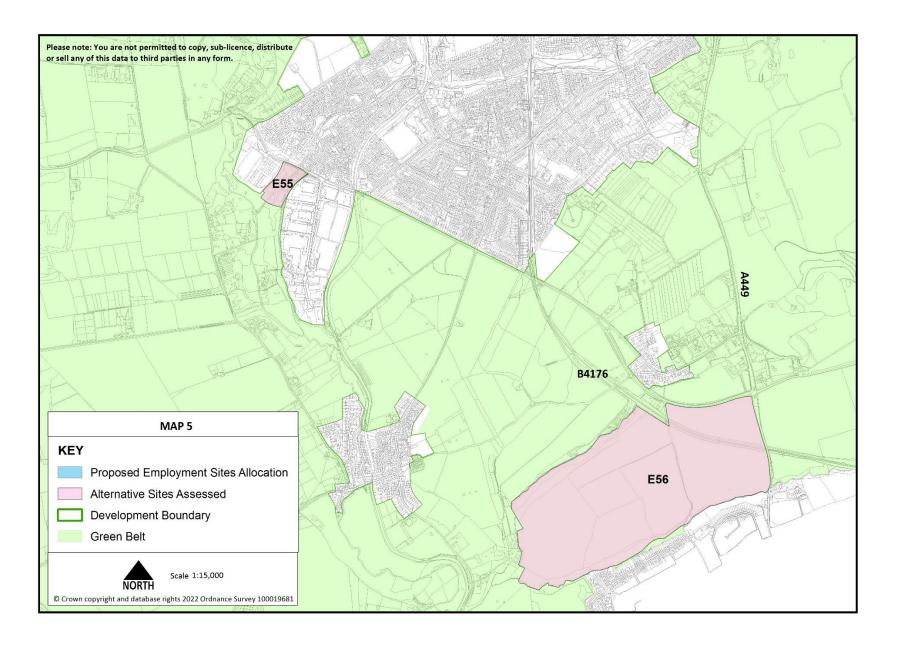
Appendix B: Maps of employment site options

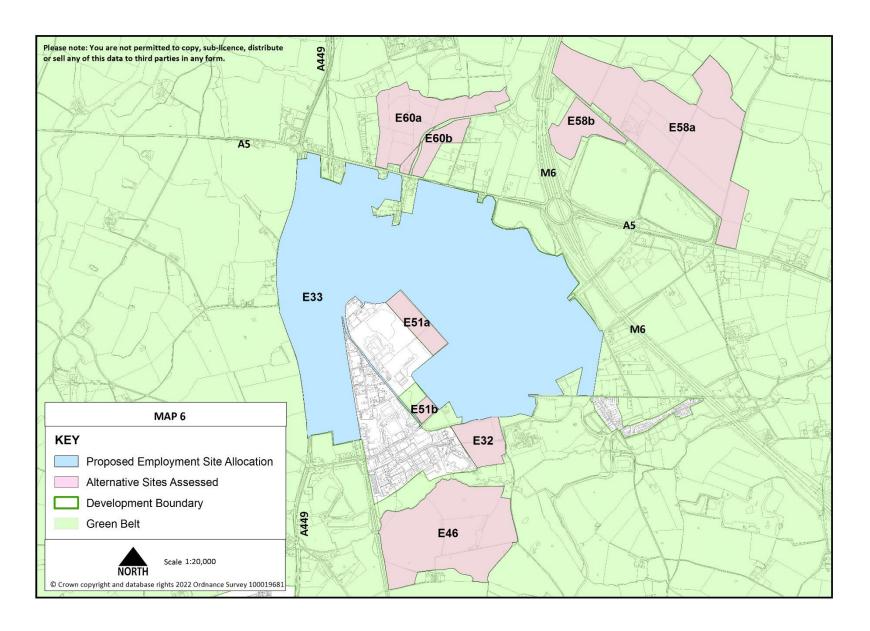


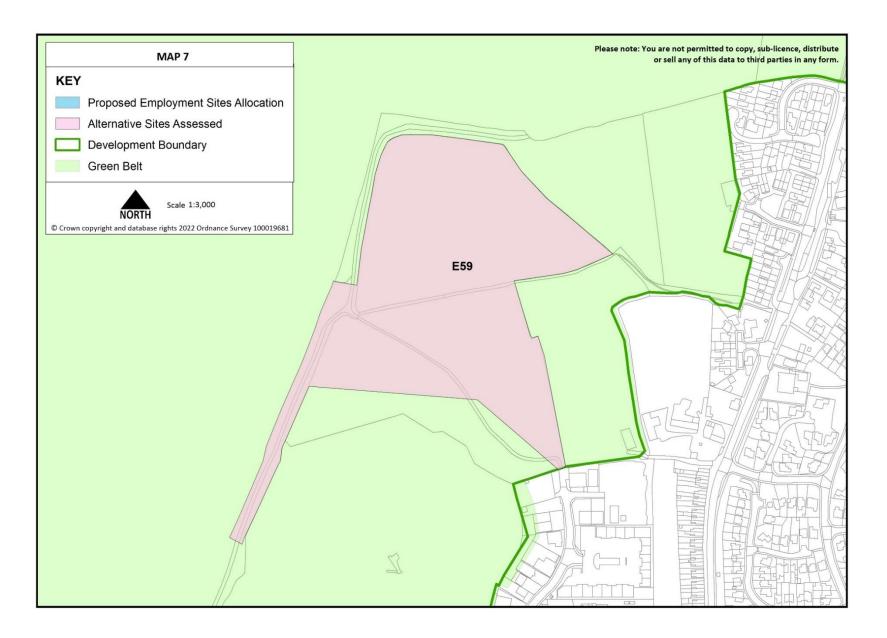












Appendix C: ELAA site scores

0	Site Assessment Criteria																							
Sites	Market	Attractive	ness		Sustainable Development								Strategic Planning Considerations								All Criteria			
Reference	Market Activity / Develope r Interest	Developmen t Constraints		Accessibilit y	Site Condition	Quality of Surroundin 9 Environme nt	Attractive	Location	Developed /	Public Transport Accessibility	Estimated Impact on Environment / Biodiversity	Suitability for Growth Sectors	Suitability for employment development (including all possible uses)	& benefits of other	Proximity to workforce with suitable skill and qualification characteristi cs	Sustainabilit y Total	Planning Context		Regeneratio n Corridor/De velopment proposals	Importance to Economic Developmen t Activities (Core Strategy)	Importance to Economic Development Activities (SEP)	Neighbourin g Uses	Strategic Planning Score Total	Total Scoring
E24 i54	5	5	5	5	5	5	30	5	3	4	4	5	5	5	5	36		5	1	5	5	4	20	86
E20 Hilton Cross	5	5	4	5	5	5	29	4	5	3	5	5	5	5	3	35	d)	5	1	5	3	5	19	83
E44 i54 westeren extension	5	5	5	5	5	5	30	1	3	4	4	5	5	5	5	32	side	5	1	5	5	4	20	82
E14 Vernon Palk	5	5	5	5	5	4	29	4	5	3	5	3	5	5	3	33	tr.	5	1	3	3	5	17	79
E18 ROF Featherstone	5	3	3	4	3	3	21	5	5	2	5	5	4	4	3	33	E S	3	4	5	5	5	22	76
E ₃₃ West Midlands Interchange	5	3	4	5	3	4	24	5	2	3	2	5	5	3	3	28	ပိ	5	5	5	5	3	23	75
E51a Extension to Bericote Four Ashes (site a)	2	3	3	5	4	4	21	5	0	3	3	4	5	4	3	27	nac	3	4	5	5	5	22	70
E51b Extension to Bericote Four Ashes (site b)	2	3	3	5	4	4	21	5	0	3	3	4	5	4	3	27	0	3	4	5	5	5	22	70
E15a Hobnock Road Essington	5	3	1	4	4	4	21	1	3	3	4	4	4	3	3	25	t or	3	3	3	3	3	15	61
E45 Land north of i54 / M54	2	2	1	5	2	2	14	5	0	5	3	4	4	5	3	29	Belt	3	3	5	5	2	18	61
E32 Land east of Four Ashes, (proposed extension	1	2	1	2	2	3	11	5	2	3	3	3	5	5	3	29	L	3	3	5	5	5	21	61
E57 Land at Mount Pleasant Dunston	2	3	3	5	3	3	19	5	0	5	3	4	4	3	3	27	Gre	3	3	3	3	3	15	61
E41 Land north of Bognop Road	2	2	1	5	2	4	16	5	2	3	3	3	4	4	3	27	re (3	3	3	3	5	17	60
E ₃₀ Land South of Junction 13 of the M6	2	3	1	4	4	4	18	2	0	5	3	4	4	4	3	25	is a	3	3	3	3	3	15	58
E50 Land at M6 Toll, Cheslyn Hay	3	2	1	5	3	4	18	5	0	3	2	3	4	5	3	25	site	3	3	3	1	5	15	58
E ₃₇ Land between ROF Freatherstone and the A ₄	2	2	1	3	3	3	14	5	0	5	3	2	3	3	3	24	se	3	3	5	5	3	19	57
E ₃ 8 Land South of Mosely Road	2	2	1	5	3	3	16	5	0	5	3	3	3	2	3	24	the	3	3	5	3	3	17	57
Eo4a Land around Dunston Business Village	3	3	3	3	3	4	19	1	0	5	3	4	4	4	3	24	ting th	3	2	3	1	4	13	56
E60 Land north of A5, Gailey	2	3	1	5	3	3	17	5	0	3	3	4	3	3	3	24	18	3	3	3	3	3	15	56
E ₃₁ Land to the East of Paradise Lane, Slade Heat	1	3	3	4	3	3	17	2	3	3	4	3	4	3	3	25	affect	3	2	3	1	3	12	54
E ₅ 8 Land at Gailey Lea Farm	2	3	1	5	3	3	17	1	0	3	3	4	5	3	3	22	ts s	3	3	3	3	3	15	54
E53 Upper Pendeford Farm	2	3	1	3	3	3	15	5	0	3	3	4	3	3	3	24	ain	3	3	3	3	3	15	54
E ₅ 6 Land at Wall Health	2	3	1	4	3	2	15	1	0	5	3	4	4	3	3	23	ıstı	3	3	3	3	3	15	53
E43 Land at Junction 11 of Hilton Park	2	2	2	2	3	3	14	1	0	5	3	4	4	4	3	24	CO	3	3	3	3	3	15	53
E49 Land at Middlehill Farm (site C)	1	3	3	4	3	3	17	4	0	3	3	3	3	3	3	22	olicy	3	3	3	1	3	13	52
E54 East of Wolverhampton Road	2	2	1	4	3	2	14	2	0	3	3	4	3	3	3	21	poli	3	3	3	3	3	15	50
E61 Land at Pendeford Hall Lane	1	3	1	3	3	3	14	5	0	3	3	3	3	3	3	23	palp	3	1	3	3	3	13	50
E47 Land at Middlehill Farm (site A)	1	2	1	5	3	3	15	1	0	3	3	4	3	3	3	20	cip	3	3	3	3	3	15	50
E59 Land north of Cocksparrow Lane, Huntington	1	3	1	3	3	3	14	3	0	3	3	2	3	3	3	20	Prir	3	3	3	1	3	13	47
E52 Land at Laney Green	1	3	1	3	3	3	14	1	0	3	3	3	3	3	3	19	_	3	3	3	1	3	13	46
E48 Land at Middlehill Farm (site B)	1	3	3	4	3	3	17	1	0	3	3	2	1	1	3	14		3	2	3	1	2	11	42