

**Local Plan Review** 

# **Publication Plan**

# Economic Strategy & Employment Site Assessment Topic Paper

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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 2023-2041. This paper is an update to the topic paper that accompanied the Council's previous Regulation 19 consultation published in November 2022.
- 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 2024.
- 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 classes<sup>1</sup>. 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 April 2024.
- 1.4 This paper must be read alongside the Council's Local Plan Review Publication Plan consultation 2024, 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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<sup>&</sup>lt;sup>1</sup> 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 less support 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) December 2023 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 86 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. Paragraph 87 of the NPPF requires that planning policies should address the specific locational requirements of different sectors.
- 2.5. The Government's <u>Build Back Better</u>: our plan for growth replaces the UK's Industrial Strategy (2017) and details the strategies central government has identified where implementation will facilitate the renewal and development of the British economy following the Covid-19 pandemic. The Council believes its policies pertaining to economic strategy align with the Government's approach to provide the infrastructure and skills necessary for economic innovation and will play a role in supporting and delivering these objectives.
- 2.6. The emerging Local Plan will also contribute towards the ambitions of Stoke-on-Trent and Staffordshire Local Enterprise Partnership as laid out in their <a href="Strategic Economic">Strategic Economic</a>

<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 Guidance<sup>2</sup>.

#### **Economic Development Needs Assessment (2022)**

- 3.4. An 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

<sup>&</sup>lt;sup>2</sup> 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 and contribute to meeting 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 2022 EDNA concluded that 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 - update (2024)**

- 3.9. Following consultation on the Council's November 2022 Publication Plan consultation the decision was taken to pause preparation of the emerging Local Plan in January 2023 following a Government consultation on changes to the NPPF that it was considered could have significant implications for our emerging Local Plan. This pause meant that it was no longer possible to submit the previously consulted on Regulation 19 plan with as 2039 plan end date, and therefore the decision was taken to undertake a further Regualtion 19 consultation with the Local Plan now covering the period 2023-41.
- 3.10. This change in circumstances necessitated an update to the EDNA to cover the period up to 2041. The update comprised details of the pipeline of employment land at 1 April 2023 (90ha) and rolled forward evidence of labour demand covering the period 2023-2041. The

update identified an objectively assessed need for South Staffordshire of 62.4ha for the period 2023-2041 which includes an increased margin for churn and frictional vacancy that reflects the requirement to make sufficient provision for its own needs upon a combination of strategic and non-strategic sources of supply commitments and allocations. The resulting contribution towards unmet need is an output of these updates to the evidence base, and identifies a surplus of 27.6ha to unmet needs.

- 3.11. The EDNA Update is clear that South Staffordshire's objectively assessed need is 62.4ha and is based upon labour demand modelling with further adjustments added. However, when considering (median based) past trends as a benchmarking exercise the study does acknowledge that need could be circa 116ha between 2023-41 based on this method.
- 3.12. The update reaffirms the conclusions of the 2022 EDNA (para 3.7 above) that 18.8ha of WMI would contribute towards the district's supply of employment land and contribute to meeting the projected demand for B8.

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

- 3.13. 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 is a Economic Land Availability Assessment (ELAA) and 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.
- 3.14. This assessment used a scoring system to 'rank' the employment sites by potential quality. The ELAA 2020 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 ELAA 2020 was published, these new sites have been assessed utilising the same methodology to that of the ELAA 2020 and are detailed under the Economic Land Availability Assessment (ELAA) heading within each assessment proforma.

#### **West Midlands Strategic Employment Sites Study**

3.15. The issue of strategic employment delivery across the wider West Midlands region has started to be explored most recently through the West Midlands Strategic Employment Sites Study (WMSESS) 2021. The WMSESS 2021 was commissioned by Staffordshire County Council, Black Country LEP, Greater Birmingham and Solihull LEP and Coventry and Warwickshire LEP with local planning authorities in the region not directly involved in the study. In this context, the study's primary focus was around engagement with the private sector to gauge market demand for new strategic employment sites, to examine recent take up, and to identify broad areas of market demand. It did not provide a full assessment of need (in terms of floorspace) that could be attributable at across the study area, however it did conclude that there was considerable demand for strategic employment site opportunities across the region and identified a number of broad locations around key junctions, including junctions on the M6 and M54 in South Staffordshire.

#### **Duty to Cooperate**

- 3.16. 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.
- 3.17. Of the other authorities within the South Staffordshire FEMA, Cannock Chase District Council (CCDC) are also in the process of preparing their new Local Plan. In February 2024 they consulted on their Pre-Submission (Regulation 19) consultation which indicated that up to 74ha of employment land will be provided over the plan period up to 2040 to meet Cannock's employment needs. There is currently no indication that Cannock are unable to meet this need within their administrative boundary, with the exception being confirmation that they require 10ha from WMI.
- 3.18. The Black Country authorities of Dudley, Sandwell and Wolverhampton are also currently preparing their Local Plans and their employment evidence has identified a self-contained Black Country FEMA covering the four Black Country authorities, albeit with strong and moderate links to a number of neighbouring authorities, including strong links with South Staffordshire. The Black Country authorities latest Employment Land Needs Assessment (October 2023) identifies a shortfall of 153ha of employment land. That study recommends that the Black Country local authorities should continue to engage through the Duty to Cooperate with neighbouring authorities that have a strong or moderate functional economic relationship with the Black Country to consider this shortfall.
- 3.19. Stafford Brough consulted on their Preferred Options document in October 2022 which confirmed around 156ha of employment land supply over their emerging plan period.

  There is no indication to date that Stafford will not be able to meet its own development needs.

#### **Updated Supply of employment land**

3.15 As set out in the EDNA update, the Council has an identified a supply of employment land of 90ha as at April 2023, 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. The available hectares figure is the actual gross hectares figure (rather than a conversation from floorspace to hectares as used in the EDNA update) and excludes supply from smaller windfall permissions falling under use classes E(g), B2, B8. This includes proposed allocated sites and sites with planning permission that are not started or under construction at April 2023.

	Site Name	Parish(es)	Site Area (Ha)	Available Land for Employment Development 2023-2041 - site areas(Ha)
ıt Site	Four Ashes Industrial Estate, Four Ashes (inc. Bericote)	Penkridge. Brewood & Coven	72.0	0.6
nen	Hilton Cross Business Park	Featherstone	18.0	0.0
oyn	ROF Featherstone.	Featherstone	36.0	36.0
Strategic Employment Site	West Midlands Interchange	Penkridge. Brewood & Coven	297.0	*297
ate	i54, Wobaston Road	Bilbrook	90.5	4.8
Str	I54 Western Extension	Bilbrook	40.0	40.0
	M6, Junction 13	Dunston	17.6	17.6
	Acton Gate	Dunston	13.7	0.0
	Balliol Business Park	Bilbrook	6.6	0.0
	Coppice Lane, Cheslyn Hay	Cheslyn Hay	7.3	0.0
as	Dunston Business Village	Dunston	2.1	0.1
nt are	Essington Light Industrial Estate	Essington	0.8	0.0
me	Hobnock Road	Essignton	5.2	**5.2
nploy	Hawkins Drive Industrial Estate	Cheslyn Hay	12.0	0.0
ıain Er	Hepworth Site, Warstones Road	Essington	3.8	0.0
Other main Employment areas	Heathmill Road Industrial Estate	Wombourne	19.3	0.0
g	Hilton Main Industrial Estate	Featherstone	7.1	0.0
	Vernon Park	Featherstone	5.7	2.8
	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	Cheslyn Hay	6.5	0.0
Estate	Chesiyii ilay	0.5	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,	Featherstone	2.2	0.0
Brinsford			
Smestow Bridge Industrial	Wombourne	21.1	0.0
Estate			
Wolverhampton Business	Bobbington	1.7	0.0
Airport			
Wombourne Enterprise Park	Wombourne	3.9	0.8
		TOTAL	399.7
		less WMI	102.7

<sup>\*18.8</sup>ha of site required to meet South Staffordshire's labour demand plus additional allowance

Table 1: South Staffordshire Employment stock (districts main employment areas)

<sup>\*\*</sup> This land has benefited from a certificate of lawful use for B2 use for over 10 years, however is in the Green Belt and therefore as a precautionary measure is not included in the supply total.

#### 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/reserved matters planning permission (as at April 2023) 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:
  - E18: ROF Featherstone 36.ha
  - E24: i54 2.4ha
  - 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 17.6ha
  - 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: 99ha
  - 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

- 1.3. In addition to the sites outlined above, following the Council's previous Regulation 19 Publication Plan consultation (November 2022), a further site was suggested E62: Land adjacent to the Four Ashes Inn, Station Road. This site is considered not suitable, in line with the approach in the council's SHELAA, due to currently being an identified playing pitch (albeit currently of poor quality). In addition the site is in the Green Belt and the Council has concluded that exceptional circumstances for Green Belt release to accommodate employment land do not currently exist. As such, the site has been scoped out and is not subject to further assessment in this paper.
- 4.4. All site options subject to assessment are mapped and set out in Appendix B.

#### Site assessment methodology

- 4.5. 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)
- 4.6. The approach taken to recording information under each of these topics is set out below.
- 4.7. 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
- 4.8. Within the site assessment proformas, major positive and major negative effects arising from the post-mitigation site assessments in the 2024 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.
- 4.9. The Council commissioned Warwick Economics and Development to undertake an Economic Land Availability Assessment (ELAA 2020) as set out in paragraphs 3.13 and 3.14. 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.
- 4.10. 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

- 4.11. 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.
- 4.12. 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.
- 4.13. 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.
- 4.14. National policy and case-law<sup>3</sup> requires that, before concluding exceptional circumstances exist, the Council must give consideration to the nature and extent of **harm to the Green Belt** and its purposes before considering release of a Green Belt site.
- 4.15. 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
- 4.16. This summarised the harm that would result from release Green Belt land across the district into the following categories:
  - Very High

<sup>&</sup>lt;sup>3</sup> Calverton Parish Council v Greater Nottingham Councils & others (2015)

- High
- Moderate-high
- Moderate
- Low-moderate
- Low
- Very low
- 4.17. 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.
- 4.18. 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
- 4.19. 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
- 4.20. 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.
- 4.21. 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.
- 4.22. 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.
- 4.23. The Council has recorded these conclusions under the relevant section of the site assessment proforma.
- 4.24. 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.
- 4.25. 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.)
- 4.26. 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.
- 4.27. 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.
- 4.28. 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.
- 4.29. These are noted in the proforma where relevant<sup>4</sup>, so that they can inform the relevant merits of different site options and potential policy requirements on specific sites.
- 4.30. The proforma then includes a summary box setting out if the site is proposed for allocation. This picks out the key merits of the site as well as key constraints before setting out if the site is proposed for allocation. It is important to note that these summaries of key points are not considered in isolation when selecting sites, but are simply designed to record some of the more potentially significant factors recorded in the site assessment process

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<sup>&</sup>lt;sup>4</sup> If constraint / opportunity is not referenced for a site, it is presumed not to exist.

#### 5. Conclusion

- 5.1. This paper has summarised the evidence base available to officers facilitating the assessment of potential employment land opportunities as part of the Local Plan preparation process. It informs the employment policies and choice of allocations to include in the Publication Plan.
- 5.2. The Council's objectively assessed need for employment land for the period 2020-40, based on the EDNA (2024) update findings, is 62.4ha, 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 have indicated a shortfall of 153ha through the Economic Land Needs Assessment (2023). South Staffordshire have proposed to provide 112.2ha 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 considered appropriate that this site is formally allocated through the Local Plan.
- 5.5. Through re-examining sites within the pipeline supply this assessment has confirmed that those sites that did not have full planning permission at April 2023 (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 update 2024 are deliverable and as such the findings of the EDNA in terms of the supply/balance and contribution of surplus strategic employment land (27.6ha not including WMI) hold true.
- 5.6. Although the Council can meet its objectively assessed need (62.4ha) through the current pipeline of sites the EDNA update does consider alternative approaches for determining need and demonstrates that need could be circa 116ha between 2023-41 based on

(median based) past trends between 2023-41, based on this alternative method. Equally market demand for strategic scale employment has been evidenced through the 2021 West Midlands Strategic Employment Sites Study. These strategic considerations have informed the decision to propose a further allocation at M6 Junction 13, Dunston. This site provides a unique opportunity in the district to deliver a strategic scale site on non-Green Belt land at a key motorway junction that was identified as a broad location within the 2021 West Midlands Strategic Employment Sites Study. The site performed well against the assessment criteria in this paper and will ensure that the pipeline of employment sites is bolstered through the Local Plan, rather than reliant solely on sites allocated through the previous plan (2018 Site Allocations Document), in order to more closely align with recent delivery of employment land in the district.

- 5.7. It is therefore proposed that the following sites are available and suitable for allocation:
  - E18: ROF Featherstone 36ha
  - E24: i54 2.4ha
  - E30: M6, Junction 13, Dunston 17.6
  - E33: West Midlands Interchange 297ha
  - E44: i54 Western Extension (northern part) -16.7ha
- 5.8 These allocations will mean that we can demonstrate that we can meet our own needs plus have a minimum of 112.2ha available for strategic cross boundary unmet needs from the Black Country. This 112.2ha surplus comprises of 27.6.ha of surplus strategic employment land identified in in the supply/demand balance in the EDNA update 2024, 17.6ha additional land allocated at M6 Junction 13, as well as a contribution from WMI towards Black Country unmet needs of 67ha based on their 2021 Stantec report<sup>5</sup>. Given the size of WMI and the fact that our EDNA 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 considered the minimum contribution available from the site. This position is reflected in the emerging draft Statement of Common Ground (SoCG) that covers employment across the South Staffordshire FEMA.
- 5.9 The assessment has therefore confirmed that with the proposed allocations at para 5.7 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 112.2ha. Given this substantial contribution and considering the findings of the site assessments at Appendix A, it is not considered that exceptional circumstances exist for Green Belt, and therefore it is the Council's choice not to release Green Belt for employment allocations. There are two non-Green Belt sites in the Open Countryside

<sup>&</sup>lt;sup>5</sup> West Midlands Strategic Rail Freight Interchange: Employment Issues Response Paper – Whose need will the SRFI serve?' (Stantec, Feb 2021)

assessed through this paper in addition to the proposed allocation at Junction 13, M6, however neither site has been assessed as suitable, in part due to being non-strategic in scale.

### **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	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	South Staffordshire Local Plan Re	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	of green space, however west of the current site t providing an extension to The site is located approximated access onto the A4  Adjacent established em accessibility / connection	there is scope for a small e hat would see limited gree a well operating business kimately 1.9km from J13, N 149.  ployment location and so bus particularly to / from Perinute walk) although footw	xtension(s) to the nfield loss, while centre. 16 and benefits from enefits from good kridge (20 minute

	<ul> <li>Site east of the A449 partially within Mineral Safeguarding Area.</li> <li>Limited key constraints associated with this site other than limited loss of agricultural land, some of which may be of Grade 2 classification.</li> <li>LLFA comments         Low risk.     </li> <li>County Highways assessment         Ok in principle - extension to existing site is feasible, A449 may need widening slightly but nothing insurmountable     </li> </ul>
Site opportunities	<ul> <li>Although proposed site extension covers entirely greenfield land, the proposed site boundary appears to be well bounded and contained especially to the north and east by Swan Lane, existing residential dwelling / A449. The west and south of the site is less clearly defined, although western extension covers greenfield area which does not appear to be in agricultural use (agricultural field boundary would act as boundary marker). Field to the north also does not appear to be in agricultural use. Field to the south is in agricultural use and would be able to provide site definition with what appears to be strong hedgerow. The site benefits from being regular in shape.</li> <li>The site is a natural expansion to the existing business village and further development of the already highly occupied site would be well received. It is understood the site owner has expressed a desire to see the site expanded due to the high levels of demand for units.</li> <li>The site is in a highly accessible location as noted by previous factors.</li> <li>Parcel of site west of existing employment area has been part of wider approved applications – 16/00497/FUL and 17/00250/FUL.</li> </ul>
Proposed for allocation?	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.  The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.  A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, this site is not strategic in scale, instead with a focus on office use meeting local SME business needs.  Balancing the above factors, the site is not proposed for allocation.

Site reference	E15a	Address	Hobnock Road, Essington.
Site size (ha)	17.5 (inc. 5.2ha with a certificate of lawful use for B2 industrial use).	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 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	63		
Policy area and access to infrastructure	The site is located within Essingte enclosed by the M6 to the west, to the east. The site is mostly cle short proximity to the M6 / M54 assessed as the B4156 (Hobnock Northern end of site is designate The next nearest employment sit Road.	Hobnock Road to the north ared with a fenced perimet although the transport rou Road) is not particularly su d as Hobnock Road Strateg	and Bursnips Road er and is within a te may need to be ited to HGV's. ic Employment Site.
	<ul> <li>The nearest railway stati</li> <li>the south east and outsi</li> <li>The A462 runs adjacent</li> </ul>	service operates along Hobron is Bloxwich North locate de of SSDC administrative at the eastern boundary of the on is J11, M6 (approx. 3.0kg	d approx. 2.9km to rea. e site, whilst the
Sequential test	The site is in the Green Belt and location. Whilst it is located at the particularly visually attractive, the Previously Developed Land.	e site of a former quarry, a	nd therefore is not
Green Belt harm	High.		
Landscape sensitivity	Low.		
Impact on historic environment	HESA scores the site a green for labeled historic environment, indicating although archaeological mitigation	no concerns identified, on o	current evidence,

#### Known site Previous quarrying use of the site is a potential constraint to constraints development. 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. No. The site performs relatively well compared to most other site options, and Proposed for 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 significant constraint. The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA. A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the

substantial pipeline of strategic employment land in the district, including an

opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).
Balancing the above factors, the site is not proposed for allocation.

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 floorspace.  The full assessment of all minor effects arising from the site is avecauth Staffordshire Local Plan Reference.	ce. and major positive and neg ailable in the Sustainability	ative sustainability
Economic Land Availability Assessment score	76		
Policy area and access to infrastructure	<ul> <li>The site is located within Featherstone Parish to the south of HMP Featherstone &amp; Oakwood.</li> <li>The site has nearby access to the A449 and Junction 2 of the M54.</li> <li>A regular bus service runs along the A449 at peak hours.</li> <li>Mixed use proposal in the Local Plan includes provisions to safeguard land for a rail based Park and Ride close to the site</li> </ul>		
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	<ul> <li>The site benefits from direct access onto the A449 and is next to Junction 2 of the M54.</li> <li>The site is within an established employment location and so benefits from good accessibility / connections particularly to Wolverhampton</li> <li>A proportion of the site is previously developed land and all the site is within a development boundary.</li> <li>The site was granted permission ref: 20/01131/OUT</li> </ul> LLFA comments		

	- County Highways assessment  No in principle objection subject to appropriate highways works / mitigation and National Highways consultation.
Site opportunities	<ul> <li>The site has good access to the strategic road network with the A449 and M54 nearby.</li> <li>Development of the site would make use of previously developed land.</li> <li>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.</li> </ul>
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 update 2024 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for reallocation

Site reference	E24	Address	154
Site size (ha)	2.4	Proposed use	E(g): office, light industrial and R&D B2: General Industrial
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. South Staffordshire Local Plan Re	e. and major positive and neg ailable in the Sustainability	ative sustainability
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		
Sequential test	Available plot within existing strategic employment site  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 – the site is within a development boundary.		
Impact on historic environment	The current planning application environment	considers impacts upon th	e historic
Known site constraints	more recent reserved maproportion of the site (22)  The site is within the exist	storic outline permission (Catters application submitte 2/00700/REM) which is per sting I54 business park and r expansion within this are	d for a large ding determination. therefore offers
	LLFA comments		
	County Highways assessment		

	The current Planning application considers highway issues.
Site opportunities	<ul> <li>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.</li> <li>The site has good access to the strategic highway network.</li> <li>The site benefits from outline planning permission with a proportion of the site subject to a reserved matters application which is pending determination.</li> <li>The site is well contained within the business park with existing defensible boundaries.</li> </ul>
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 a previous outline consent (05/01311/OUT).  The site was already factored into the supply/demand balance in the EDNA update 2024 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for reallocation

Site reference	E30	Address	Land south of J13,	
Site size (ha)	17.6	Proposed use	M6.  B2 – General Industrial.  B8 – Storage & Distribution.  E(g)(ii) -R&D  E(g)(iii) – industrial processes	
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	<ul> <li>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.</li> <li>Site is located on the opposite side of the M6 from Acton Gate Employment Site.</li> <li>An hourly or better bus service operates along A449 with bus stop located within boundary of site.</li> <li>The nearest railway station is Penkridge railway station located 4.3km south of the site.</li> <li>The site is located immediately adjacent J13, M6 and A449.</li> </ul>			
Sequential test	Site is designated Open Countryside which is sequentially preferable to other Green Belt site options.			
Green Belt harm	The site is entirely located within the Open Countryside.			
Landscape	47.84ha – low – moderate (east of WCML).			
sensitivity	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	<ul> <li>The site is intersected by the West Coast Mainline which could impede further expansion of the site.</li> <li>Western part of the site has no clear route of access and is partly located within Flood Zone 3</li> </ul>			

- 6 Public Right of Ways intersect the site.
- Roughly eastern two-thirds of site is located with Mineral Safeguarding Area.
- Dunston village to the south east includes residential environment which amenity would need to be considered as part of scheme design.

#### 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?

**Yes.** The site performs relatively well and has a clear advantage for distribution/logistics of being very close to the M6 (J13) and significantly is not in the Green Belt. Staffordshire County Council highways team have confirmed that the site is 'ok in principle subject to significant highways improvements'.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI and any further allocations that add to the pipeline. This results in a potential significant contribution (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). Despite the site being less than the optimum size for a strategic employment site, the site very well performs in all other respects, and crucially is not subject to Green Belt constraint.

Balancing the above factors, the site is 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	54				
Availability					
Assessment score					
Policy area and	This site is located within Featherstone Parish and is designated Green Belt. It is				
access to	currently used for the storage of HGV trailers with access directly from New Road				
infrastructure	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 (0.8k distance).				
	<ul> <li>Nearest bus stop served by hourly or better bus service is located 1.3km west at the edge of Coven.</li> </ul>				
	<ul> <li>No railway station in reasonable proximity to the site, however proposed Brinsford Station may come forward in future approximately 1.1km south of the site.</li> </ul>				
	<ul> <li>Nearest A-Road is A449 located 1.1km west of site. The nearest motorway junction is J2, M54 located 2.3km south west of site.</li> </ul>				
Cognoptial tast					
Sequential test	The site is in the Green Belt and location.	a therefore is not a sequenti	ану ргенегаріе		
Green Belt harm	Moderate – high.				
Landscape sensitivity	Low – Moderate.				
Impact on historic	HESA scores the site a green fo	r both direct and indirect po	tential harm to the		
environment	historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.				

#### 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. **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 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 supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA. A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study

(WMSESS). However, the site is in the Green Belt and it is the Council's choice not

to release further Green Belt for employment land at this current time given the
substantial pipeline of strategic employment land in the district, including an
opportunity to allocate a further strategic site on non-Green Belt land (M6,
Junction 13). Furthermore, this site is not strategic in scale.
Balancing the above factors, the 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		
Economic Land Availability	South Staffordshire Local Plan Re 61	view.	
Assessment score			
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).		
	<ul> <li>Site is immediately adjacent to Four Ashes Strategic Employment Site.</li> <li>Nearest bus stop served by service with frequency of at least one per hour is located 1.1km west of site on A449.</li> </ul>		
	<ul> <li>Nearest A-road junction is 1.0km west of site (A449 / Station Drive / Four Ashes Road crossroads).</li> </ul>		
Sequential test	<ul> <li>Nearest motorway junction is 3.4km north east of site (J12, M6).</li> <li>The site is in the Green Belt and therefore is not a sequentially preferable location.</li> </ul>		
Green Belt harm	High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site an amber for both direct and indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated or are at present predicted.		
Known site constraints	<ul> <li>Adjacent to the south west boundary of the site is Four Ashes Site of Biological Importance although this runs along the southern boundary of the wider strategic employment site. The northern boundary of the site abuts the Canal Conservation Area and Calf Heath Bridge Biodiversity Alert Site. Both these designations run adjacent to the eastern boundary of the existing employment site.</li> </ul>		

- 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.

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.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an

opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).
Balancing the above factors, the 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.  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		
Francis I and	South Staffordshire Local Plan Re	eview.	
Economic Land Availability Assessment score	77		
Policy area and	The majority of the site is located	d within the Green Belt in P	enkridge Parish,
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 therefore is not a sequentially preferable location. However, it does benefit from a consent through the DCO process and therefore the suitability of B8 logistics in this location has been accepted in principle.		
Green Belt harm	Moderate – High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site an amber for historic environment, indicating or are at present predicted.	•	

## Known site Site of Biological Importance located adjacent to the north east corner of constraints 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 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 Yes. The principle of the development is already established through the DCO allocation? 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 site can be built in line with the DCO without amending Green Belt boundaries, it is proposed that the site is allocated but will remain washed over by Green Belt.

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.		
	site, however there are p Brinsford Parkway.	station within an appropria proposals to deliver a Strate sent the western boundary ately 0.5km south.	gic Park and Ride–
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Northern half of site – High. Southern half of the site (56.5ha) – very high.		

Landscape	Moderate.	
Impact on historic environment	HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.	
Known site constraints	<ul> <li>Central 'belt' of the site located within Flood Zones 2 and 3.</li> <li>Barriers to site acting as effective extension to ROF Featherstone due to WCML separating the sites.</li> <li>Southern third of site located within Mineral Safeguarding Area.</li> <li>Canal Conservation Area is located adjacent site along the north west boundary.</li> <li>LLFA comments         Northern part of site: mitigable concerns – Flood Risk Assessment recommende at planning stage to investigate watercourse and surface water ponding.     </li> <li>Southern part of site: mitigable concerns – at planning stage, rationalise ground</li> </ul>	
	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	<ul> <li>Canal towpath located adjacent part of western boundary of site to potentially provide cycle connectivity opportunity.</li> <li>Brewood and Coven 0.915a and b Public Right of Way located adjacent northwest boundary of site.</li> <li>The site is extremely well bounded by West Coast Mainline on its eastern side. The northern boundary of site is also strongly contained by New Road, Old Stafford Road and Cross Green hamlet. The western boundary is less 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.</li> <li>Site promotor is targeting residential development and employment land is a secondary / ancillary option following a residential-led scheme.</li> <li>Site has previously been marketed for employment use but has been unsuccessful in coming forward due to viability issues / infrastructure costs – overcome through mixed-use residential-led scheme which is more attractive to the market.</li> <li>Potential supply-chain opportunities with i54 occupiers.</li> <li>Site is readily available from Stafford Lane and due to proximity of Wolverhampton / West Midlands conurbation access to workforce is not considered an issue.</li> </ul>	

## Proposed for allocation?

**No.** The site performs relatively well and has the advantage of potentially forming an extension to ROF Strategic Employment 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 site has predominantly been promoted for residential led mixed use development.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).

Balancing the above factors, the 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	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			
Economic Land Availability Assessment score	57	South Staffordshire Local Plan Review.  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. 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.			
Sequential test	The nearest motorway junction is J1, M4 located 0.8km north of the site.  The site is in the Green Belt and therefore is not a sequentially preferable location.			
Green Belt harm	Very high.			
Landscape sensitivity	Moderate.	, •		
Impact on historic environment	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 slope development.  Potential conflict with of the site.  (Woods north of) Wes	te at its north east corner wen 30 and 100 meters northing topography may limit the residential amenity toward accord Biodiversity Alert Site approximately 35,400m <sup>2</sup> .	n of the existing sales he extent of any ds the south east corner he designation located	

	A460 / Cannock Road provides site with immediate access to well-lit			
	<ul><li>pedestrian footway.</li><li>Entire site is located within Mineral Safeguarding Area.</li></ul>			
	TPOs situated in an area to the North East of site			
	The State and the test to the Horar East of Site			
	<u>LLFA comments</u>			
	Low risk.			
	County Highways assessment			
	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.			
	<ul> <li>Due to the site's location in close proximity to the strategic road network</li> </ul>			
	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.			
	The supply/demand balance in the EDNA update 2024 indicates that South			
	Staffordshire's local needs can be met and that there is a 27.6ha surplus of			
	strategic employment land available for cross boundary unmet needs increasing			
	further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant			
	contribution of 112.2ha (inc. minimum WMI contribution) available for export to			
	the unmet needs of the Black Country FEMA.			
	A need for strategic scale logistics and manufacturing across the wider region has			
	been determined through the West Midlands Strategic Employment Sites Study			
	(WMSESS). However, the site is in the Green Belt and it is the Council's choice not			

to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an
opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).
Balancing the above factors, the site is not proposed for allocation

Site reference	E41	Address	Land north of
Site reference	L41	Address	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 predic	ted against the economy cr	riteria due to the site
	delivering employment floorspa	ce. Major negative effects a	re predicted against
	the landscape criteria, due to the	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 Ro	eview.	
Economic Land	60		
Availability			
Assessment score			
Policy area and	The north of the site is located w		•
access to	the site is located within Essingt	-	
infrastructure	and Hilton Main Industrial Estate		•
	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.		
	and onal estimate marking and Essington ward in the south		
	Nearest bus stop which hosts an hourly or better bus service is located		
	approximately 0.3km west of the site along A460 Cannock Road.		
	Although located adjacent J1, M54, there is a 1.0km travel distance to		
	the access the junction, and approximately 0.2km east of A460 / Cannock		
	Road.		
Sequential test	The site is in the Green Belt and	·	• •
	location. Whilst it is located at the	•	
	particularly visually attractive, the	ie site is not considered to i	meet the definition of
Green Belt harm	Previously Developed Land.  Western half of the site (30.3ha)	_ hiσh	
Green bert narm	Eastern half of the site – very high	_	
Landscape	Low.	<b>5</b>	
sensitivity			
Impact on historic	HESA scores the site a green for	both direct and indirect pot	tential harm to the
environment	historic environment, indicating no concerns identified, on current evidence,		
	although archaeological mitigation measures may be required.		
Known site	-	been used as a quarry and r	
constraints	woodland and pools so site will incur remediation costs.		
	EDNA2 identifies listed windmill and monument which could act as		
	barrier to development.		

- 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.

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.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an

opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).
Balancing the above factors, the 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 Re	-	• •
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.		
	<ul> <li>Nearest bus stop which host an hourly or better bus service is located approx. 1.7km south east of the site along Walkmill Lane.</li> <li>The nearest railway station is located approx. 3.1km north east of the site at Cannock. The nearest railway station within SSDC administrative area is Landywood located approx. 4.8km south east of the site.</li> <li>The site is set-back from both the A5 Cannock Road and A4601 Wolverhampton Road with no clear point(s) of access. The nearest motorway junction is located approx. 1.3km south of the site at Junction T7, M6 Toll. The nearest non-toll connection is J11, M6 located approx. 2.1km south east.</li> </ul>		
Sequential test	The site is a Previously Developed Land site in the Green Belt.		
Green Belt harm	High.		
Landscape sensitivity	Low – moderate.		

Impact on historic	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,		
environment	although archaeological mitigation measures may be required.		
Known site	The site is a former sewage works which would require remediation and		
	impinge upon viability.		
constraints			
	No clear and obvious access to the site. EDNA2 identified proposed  Access along paragraph driven and Malyandar Board adjacent  Access and Acces		
	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.		
	<ul> <li>No direct access to the site from an illuminated footway.</li> </ul>		
	<ul> <li>Site is not particularly attractive to the market due to being set back from the highway.</li> </ul>		
	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.		
	<ul> <li>Clusters of TPOs along the Western boundary of site.</li> </ul>		
	, and a second of the second o		
	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	No. The site was considered unsuitable in the EDNA2 and has a considerable		
allocation	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.		
	The supply/demand balance in the EDNA update 2024 indicates that South		
	Staffordshire's local needs can be met and that there is a 27.6ha surplus of		
	strategic employment land available for cross boundary unmet needs increasing		
	further when factoring in available supply at WMI. When also factoring in the		
	proposed new allocation at M6, Junction 13, this results in a potential significant		
	and the second s		

contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.

Balancing the above factors, the 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 predicted 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	ce. Major negative effects a e site's Green Belt harm. and major positive and neg vailable in the Sustainability	re predicted against ative 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	High.		
Landscape sensitivity	Moderate.		
Impact on historic environment	HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.		
Known site constraints	<ul> <li>New M54 / M6 link road cuts through the site and will act as barrier to eastern half development. Not aided by Hilton Lane being unsuitable for HGV access and direct access to link road considered problematic.</li> <li>Brookfield Farm Site of Biological Importance located across part of the northern third of the site.</li> <li>Flood Zones 2 + 3 located across part of the northern third of the site.</li> <li>The Hag Biodiversity Alert Site located within the site.</li> <li>The site has excellent pedestrian accessibility from A460.</li> </ul>		

- 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

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.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).

Balancing the above factors, the site is not proposed for allocation

Site reference	E44	Address	I54 western
Site reference		Mudicss	extension (north)
Site size (ha)	16.7ha	Proposed use	E(g) – Office, 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.  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	82		
Policy area and access to infrastructure	The site will form an extension to the I54 business park (known as the western extension) and benefits from the existing infrastructure as well as nearby access to the A449 and direct access onto Junction 2a of the M54.  • 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 sensitivity	N/A – the site is within a development boundary.		
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 in Bilbrook Parish and and benefits from the existing in and Junction 2a of the M54.  LLFA comments		·
	County Highways assessment No in principle objection.		

Site opportunities	<ul> <li>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</li> <li>The site has good access to the strategic highway network.</li> <li>Cycle way and good pedestrian connectivity along the Wobaston Road</li> <li>The site is well contained benefiting from existing defensible boundaries.</li> <li>Site is highly accessible and so access to workforce is not considered to be an issue.</li> </ul>
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 update 2024 and this assessment has confirmed that there are no showstopper precluding the site from development and as such the site is proposed for reallocation.

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		are predicted against
	effects arising from the site is a South Staffordshire Local Plan F	vailable in the Sustainability	•
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 locat less than 0.1km from i54 Strategic Employment Site.		
	<ul> <li>located approx. 0.6km</li> <li>There is currently no transfer of the site. However, the would be located approximated.</li> <li>The site sits immediate</li> </ul>	hich hosts an hourly or bett south of the site along Inno- ain station located within an he proposed Brinsford Parkv ox. 3.7km east of the site. ly adjacent J2, M54 eastbouthe westbound exit and A44	vation Drive. n appropriate distance vay Railway Station and exit. Approx. 0.6km
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	<ul> <li>The site is located adjacent operational sewage works which may rend the site unattractive.</li> <li>Site is slightly sloped in topography and includes wooded area in its eastern half.</li> <li>Waterhead Brook dissects the site, with Flood Zones 2 + 3, limiting development potential.</li> </ul>		ooded area in its

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. No. The site performs relatively well and has a clear advantage of being very Proposed for allocation 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. The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not

to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6,
Junction 13).
Balancing the above factors, the site is not proposed for allocation.

Site reference	E46	Address	Aspley Farm, south 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 predict delivering employment floorspace the landscape criteria, due to the The full assessment of all minor 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	The site was deemed unsuitable in the EDNA2		
Policy area and access to infrastructure  Sequential test	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 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.  The site is in the Green Belt and therefore is not a sequentially preferable		
Green Belt harm	location. High.		
Landscape sensitivity	Low – moderate.		
Impact on historic environment	HESA scores the site an amber for historic environment, indicating or are at present predicted.		
Known site constraints	<ul> <li>access to the site.</li> <li>Access through Four Ash and wooded area.</li> <li>Aspley Close is relatively</li> </ul>	oining the western boundar es challenging due to cross small in access terms – pro Northern edge and south ea	ing Saredon Brook viding infrastructure

- 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.

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.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the

proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).

Balancing the above factors, the site is not proposed for allocation.

Site reference	E47	Address	Land at Middlehill
Site size (ha)	17.11	Proposed use	Farm (Site A).  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 floorspathe landscape criteria, due to the The full assessment of all minor effects arising from the site is available.	ce. Major negative effects a e site's Green Belt harm. and major positive and neg railable in the Sustainability	re predicted against ative sustainability
Economic Land Availability Assessment score	50		
Policy area and access to infrastructure	<ul> <li>The site is located within Saredon Parish on the edge of Cannock. The site is equidistant from existing employment sites both within and outside of South Staffordshire administrative area. Located approx. 0.53km north of the site along A460 Wolverhampton Road lies existing informal employment space within Cannock Chase District Council administrative area. Located approx. 0.54km east of the site sits Hawkins Drive Industrial Estate Strategic Employment Site.</li> <li>The nearest bus stops which hosts an hourly or better bus service is located approx. 2.6km north east along Delta Way.</li> <li>The nearest railway station is Landywood, located approx. 3.7km south east of the site.</li> <li>The A460 Wolverhampton runs adjacent the eastern boundary of the site. Junction T8, M6 Toll is located approx. 0.2km south of the site. J11, M6 is located approx. 1.1km south of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Moderate.		
Impact on historic environment	HESA scores the site an amber for environment, indicating no signing present predicted. The site score historic environment, indicating although archaeological mitigation.	ficant effects which cannot es a green for indirect poter no concerns identified, on o on measures may be requir	be mitigated are at
Known site constraints	<ul> <li>There is an electricity py with associated cabling</li> </ul>	rion located in the north eas crossing the site.	t corner of the site

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 LLFA comments Low risk. County Highways assessment Initial concerns due to impact on A460/A4601 roundabout and other surrounding iunctions 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 the A4601 Wolverhampton and the southern boundary abuts Saredon Road. The western and northern boundaries are not as strong as they are both defined by tree-lines with open fields beyond. • 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 **No.** The site performs relatively poorly and was deemed 'other' quality in the allocation 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. The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA. A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the

substantial pipeline of strategic employment land in the district, including an

opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).
Balancing the above factors, the 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	delivering employment floors the landscape criteria, due to The full assessment of all mir	nor and major positive and ne s available in the Sustainabilit	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.			
	<ul> <li>3.5km east of the site a</li> <li>The nearest railway sta equidistantly from the site respectively.</li> <li>The A460 / Saredon Roa</li> </ul>	tions are Cannock and Landy site at approx. 3.9km south ea ad island is located adjacent t	wood, located ast and north east of he north east of the	
	_	te access onto an A-Road. Jun south west of the site. J11, M e 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	<ul><li>amenity consideration</li><li>Site has potentially entire which provides lighter</li></ul>	rial dwellings to the south eas ons. xcellent access to A4601 Wol ed pedestrian access to Wedg a Brick Clay Mineral Safegua	verhampton Road es 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. No. The site performs relatively poorly and was deemed 'other' quality in the Proposed for allocation 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. The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA. A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale. Balancing the above factors, the site is not proposed for allocation

Site reference	E49	Address	Land at Middlehill
			Farm (Site C).
Site size (ha)	3.3	Proposed use	E(g) – Office or Light
			Industrial. B2 – General
			Industrial.
			B8 – Storage or
			Distribution.
Site selection	Assessment		2.5tm acrom
criteria			
SA findings	Major positive effects are predic	ted against the economy cr	iteria due to the site
	delivering employment floorspa	ce. Major negative effects a	re predicted against
	the landscape criteria, due to the	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		•
	South Staffordshire Local Plan R	eview.	
Economic Land	52		
Availability			
Assessment score			
Policy area and	The site is located in Cheslyn Ha		
access to	south of Middle Hill Farm. The is located approx. 165m south west of Hawkins		
infrastructure	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.		
	<ul> <li>The nearest railway station is Landywood, located approx. 2.7km south east of the site.</li> <li>The A460 / Saredon Road island is located approx. 120m north of the site. Junction T8, M6 Toll is located approx. 0.5km west of the site. J11,</li> </ul>		
	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 sequentia	ally preferable
	location.		
Green Belt harm	High.		
Landscape	Low – Moderate.		
sensitivity	HESA scores the site a green for	hoth direct and indirect not	tential harm to the
Impact on historic environment	HESA scores the site a green for historic environment, indicating		
environment	although archaeological mitigati		
Known site	Topography of the sight		
constraints		rick Clay Mineral Safeguard	ing Area.
	<ul> <li>TPOs situated on Weste</li> </ul>	•	<u> </u>
	LLFA comments	A a a a a a a a a a a a a a a a a a a a	at alamaina -t t-
	Mitigable concerns – Flood Risk		at planning stage to
	investigate possible watercourse	<b>:</b> .	
	1		

	County Highways assessment
	Initial concerns due to impact on A460/A4601 roundabout and other surrounding
	junctions
Site opportunities	<ul> <li>Cheslyn Hay 3 Public Right of Way runs adjacent to southern boundary of site.</li> <li>The site fits into existing field pattern. It is well contained by a wedge of dense tree growth acting as a buffer to the M6 Toll on the site's northern</li> </ul>
	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.
	<ul> <li>The site would be attractive to the market due to excellent motorway network access.</li> </ul>
	<ul> <li>Due to proximity of the site to strategic road network and Cannock, access to workforce is not anticipated to be problematic.</li> </ul>
Proposed for	No. The site performs relatively poorly with a number of key constraints
allocation	including its location within a brick clay safeguarding area and initial concerns from County highways on its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.
	The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.
	A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).
	Balancing the above factors, the site is not proposed for allocation

Site reference	E50	Address	Land at M6 Toll,
			Cheslyn Hay
Site size (ha)	2.76	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	cted against the economy c	riteria due to the site
371111011193	delivering employment floorspa		interia due to the site
	The full assessment of all minor	and major positive and neg	gative sustainability
	effects arising from the site is a		•
	South Staffordshire Local Plan R	eview.	
Economic Land Availability	58		
Assessment score			
Policy area and	The site is located within Chesly	,	
access to	The site sits to the north west of	f Hawkins Drive Industrial E	state Strategic
infrastructure	Employment Site.		
	<ul> <li>The nearest bus stop which hosts a regular bus service is located approx.</li> <li>0.8km south of the site along Wolverhampton Road.</li> </ul>		
	<ul> <li>The nearest railway station is Landywood, located approx. 2.7km south east of the site.</li> </ul>		
	The A460 / Saredon Ro	ad island is located approx.	0.2m north west of
	,	ss onto an A-Road. Junction	
	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 and location.	therefore is not a sequenti	ally preferable
Green Belt harm	Low – Moderate.		
Landscape sensitivity	Low.		
Impact on historic	HESA scores the site an amber f	-	
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 mitigation measures may be required.		
Known site		even in topography and veg	
constraints	<ul> <li>Alternative site access is located off Saredon Road which is not in the site promotors control.</li> </ul>		
	<ul> <li>No clear access to the site from Hawkins Drive Industrial Estate.</li> </ul>		
	Site is located within a E	Brick Clay Mineral Safeguard	ding Area.

	LLFA comments Low risk.  County Highways assessment Significant highways concerns due to lack of suitable access	
Site opportunities	<ul> <li>The site fits very well into existing urban infrastructure with the M6 Toll bounding the site to the north, and Hawkins Drive Industrial Estate bounding the site to the east and south. The west of the site is contained by a wooded area.</li> <li>The site provides an opportunity for 'natural' expansion to existing employment area subject to plot accessibility.</li> <li>Due to the proximity of the site to motorway network and established employment area, market interest is anticipated to be high.</li> <li>Due to the proximity of the site to strategic road network and Cannock, access to workforce is not anticipated to be problematic.</li> </ul>	
Proposed for	No. The site performs relatively poorly with a number of key constraints	
allocation	including its location within a brick clay safeguarding area and initial significant concerns from County highways relating to the lack of a suitable access.  The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.	
	A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.  Balancing the above factors, the 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	70		
Assessment score	The site is leasted within Donlari	dan Davish and in insurandiat	alvadia sant ta Farm
Policy area and access to	The site is located within Penkrio	~	ery adjacent to Four
infrastructure	Ashes Strategic Employment Site.		
	<ul> <li>The nearest bus stop which hosts a regular bus service is located approx.         <ul> <li>0.8km west of the site along A449 Stafford Road.</li> </ul> </li> <li>The A449 Stafford Road is located approx. 0.8km west of the site.         <ul> <li>Junction 12, M6 is located approx. 3.9km north east of the site.</li> </ul> </li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	Moderate – High.		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul> <li>The site is currently a wooded area.</li> <li>Gravelly Way which runs along the western boundary of the site provides a well-lit pedestrian access to the site from A449 Stafford Road.</li> <li>Majority of the site is within an area of high habitat distinctiveness, which the NRN mapping indicates should be avoided for development</li> <li>Site is located within a Mineral Safeguarding Area.</li> </ul>		
	LLFA comments Low risk.		
	County Highways assessment		

	Ok in principle.		
Site opportunities	<ul> <li>Bridle-way / Byway along canal which is located approx. 370m west of the site providing cycle provision for the site.</li> <li>The site provides opportunity for 'natural' extension to existing Four Ashes employment area.</li> <li>Development of the site could provide a new access to Four Ashes from Vicarage Road and further improve accessibility to Bericote with another point of access.</li> <li>The site sits within current field boundaries. The parcel of land is well defined to the west by the existing Four Ashes employment area. The eastern boundary of the site is defined by further wooded area. Although the north and the south are contained by field markings, this does not provide strong protection to open fields beyond. However eventually the proposed West Midlands Interchange will border the site on north, east and southern boundaries.</li> <li>Highly desirable location to the market due to proximity of Four Ashes which has received significant investment recently and there remains outstanding interest and development potential.</li> <li>Due to the location of the site adjacent to Four Ashes, the site is</li> </ul>		
Proposed for allocation	And the site performs relatively well and has a clear advantage of being a logical extension to an existing employment site, however it is entirely wooded and is an area of high habitat distinctiveness. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District. Despite this, its Green Belt function could potentially be weakened in the future by the presence of surrounding employment land as WMI is developed.		
	The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increas further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential signific contribution of 112.2ha (inc. minimum WMI contribution) available for export the unmet needs of the Black Country FEMA.		
	A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.		
	Balancing the above factors, the site is not proposed for allocation.		

Site size (ha)   1.92   Proposed use   E(g) – Office or Light Industrial.   B2 – General Industrial.   B2 – General Industrial.   B3 – Storage and Distribution.   B4 – Storage and Distribution.   B5 – Storage and Distribution.   B6 – Storage and Distribution.   B6 – Storage and Distribution.   B6 – Storage and Distribution.   B7 – Storage and Distribution.   B8 – Storage and Distribution.   B6 – Storage and Distribution.   B7 – Storage and Distribution.   B8 – Storage and Distribution.   B7 – Storage and Distribution.   B8 – Storage and Distribution.   B7 – Storage and Distribution   B7 – S	Site reference	E51b	Address	Extension to
Site size (ha)   1.92   Proposed use   E(g) — Office or Light Industrial. B2 — General Industrial. B2 — General Industrial. B3 — Storage and Distribution.    Site selection criteria   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.    Folicy area and access to infrastructure   The site is located within Penkridge Parish and is immediately adjacent to Four Ashes Strategic Employment Site.				· ·
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.  Folicy 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 site is in the Green Belt and therefore is not a sequentially preferable location.  Green Belt harm  Landscape sensitivity  Impact on historic environment  my Moderate – High.  Landscape sensitivity  Impact on historic environment  white constraints  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.  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 Assessment recommended at planning stage to	Site size (ha)	1.92	Proposed use	E(g) – Office or Light Industrial. B2 – General Industrial. B8 – Storage and
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.  To Availability Assessment score  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.  The site is in the Green Belt and therefore is not a sequentially preferable location.  Green Belt harm Moderate – High.  Landscape Low – Moderate.  Sensitivity  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.  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 Assessment recommended at planning stage to		Assessment		
Availability Assessment score  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  Low – Moderate – High.  Low – Moderate.  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.  LIEA comments  Mitigable concerns – Flood Risk Assessment recommended at planning stage to	SA findings	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		
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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  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 Assessment recommended at planning stage to		The chart leaded this Book is	de la Baraca de Carta de La Ca	d alternative en
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 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 Assessment recommended at planning stage to	•	, ,		
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 Moderate – High. Low – Moderate.  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 Assessment recommended at planning stage to		Asiles strategic employment site.		
Sequential test  The site is in the Green Belt and therefore is not a sequentially preferable location.  Green Belt harm  Moderate – High.  Low – Moderate.  HESA scores the site a green for direct potential harm to the historic environment 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 Assessment recommended at planning stage to		1.1km west of the site along A449 Stafford Road.		
Iocation.	Sequential test			
Landscape sensitivity  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 Assessment recommended at planning stage to				
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constraints  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 Assessment recommended at planning stage to		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		
Mitigable concerns – Flood Risk Assessment recommended at planning stage to		<ul> <li>Green Corridor and Conservation Area.</li> <li>If the site can effectively be connected to the wider existing Four Ashes employment area, then a well-lit pedestrian access can be facilitated.</li> <li>Site is located within a Mineral Safeguarding Area.</li> </ul>		
I HIVESTIGATE MODSINIC WATERCOST St		investigate possible watercourse		at planning stage to

	County Highways assessment		
	County Highways assessment  OK in principle.		
Site opportunities	<ul> <li>Bridleway / Byway along canal which runs adjacent western boundary of the site providing cycle provision.</li> <li>The site provides opportunity for 'natural' extension to existing Four Ashes employment area.</li> <li>Development of the site could provide a new access to Four Ashes from Vicarage Road and further improve accessibility to Bericote with another point of access.</li> <li>The site sits within current field boundaries. The parcel of land is particularly well defined on three of its four sides. To the west by the canal with existing Four Ashes employment area beyond, to the north by most recent construction at Four Ashes, and to the south by Vicarage Road. The eastern boundary of the site is the weakest containment as defined by tree / hedge row protecting open fields beyond.</li> <li>The site appears to have been previously used, with approximately two thirds of the site showing signs of development including historic usage. The remaining third has re-naturalised.</li> <li>Highly desirable location to the market due to proximity of Four Ashes which has received significant investment recently and there remains outstanding interest and development potential.</li> <li>Due to the location of the site adjacent to Four Ashes, the site is attractive to the market and should easily access workforce.</li> <li>The site, excluding the electricity substation located in the south east corner, was included in the masterplan for approved application 16/00498/FUL.</li> </ul>		
Proposed for allocation	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.  The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.  A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an		

opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). Furthermore, this site is not strategic in scale.
Balancing the above factors, the 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
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 effects arising from the site is av South Staffordshire Local Plan R	ailable in the Sustainability	•
Economic Land	46	eview.	
Availability	40		
Assessment score	The site straddles both Caradan	Darich and Chacken Hay Dar	ich and is lesated
Policy area and access to	The site straddles both Saredon approx. 520m south west of Hav		
infrastructure	Employment Site.	WKIIIS DITVE IIIUUSIITAI ESIALE	: Strategic
IIII astructure	Employment Site.		
	<ul> <li>The nearest bus stop which hosts a regular bus service is located approx. 0.6km south of the site along Wolverhampton Road.</li> <li>The nearest railway station is Landywood, located approx. 2.9km east of the site.</li> <li>The site is located 1.7km east of J11, M6. The nearest A-Road is the A460 located approx. 1.9km north of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Low – moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul> <li>The site is sloped in topography.</li> <li>Potential conflict with residential amenity as dwellings located to the south west of the site along Wolverhampton Road.</li> <li>Wolverhampton Road abutting the eastern boundary of the site does have a footpath, although there are no street lights and the quality of the hardstanding is poor. As such, there is no obvious pedestrian access to the site.</li> <li>Site is located within a Mineral Safeguarding Area, including an area of Brick Clay</li> </ul>		

	ILEA commants		
	LUFA comments Low risk.		
	LOW 115K.		
	Country Highway a consequent		
	County Highways assessment		
	Initial concerns due to impact on A460/A4601 roundabout and other surrounding		
	junctions		
Site opportunities	<ul> <li>Cheslyn Hay 2 Public Right of Way adjoins the southern boundary of the site.</li> </ul>		
	The site is currently defined by existing field boundaries. The western  and costons / court on boundaries are well defined by read.		
	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	<b>No.</b> The site performs relatively poorly and was deemed 'other' quality in the		
allocation	EDNA2. The site 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.		
	The supply/demand balance in the EDNA update 2024 indicates that South		
	Staffordshire's local needs can be met and that there is a 27.6ha surplus of		
	strategic employment land available for cross boundary unmet needs increasing		
	further when factoring in available supply at WMI. When also factoring in the		
	proposed new allocation at M6, Junction 13, this results in a potential significant		
	contribution of 112.2ha (inc. minimum WMI contribution) available for export to		
	the unmet needs of the Black Country FEMA.		
	A need for strategic scale logistics and manufacturing across the wider region has		
	been determined through the West Midlands Strategic Employment Sites Study		
	(WMSESS). However, the site is in the Green Belt and it is the Council's choice not		
	to release further Green Belt for employment land at this current time given the		
	, ,		
	substantial pipeline of strategic employment land in the district, including an		
	opportunity to allocate a further strategic site on non-Green Belt land (M6,		
	Junction 13).		
	Delensing the above featons the site is not appropriately and for all particular		
	Balancing the above factors, the site is not proposed for allocation.		

C'1 C	552	A 11	1,,,,,,,
Site reference	E53	Address	Upper Pendeford
Site size (ha)	35.11	Proposed use	Farm.  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 av	-	Appraisal of the
	South Staffordshire Local Plan Re	eview.	
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.		
	<ul> <li>The nearest bus stop which hosts a regular bus service is located approx. 1km east of the site along Innovation Drive.</li> <li>The nearest railway station is Bilbrook, located approx. 2.4km west of the site.</li> <li>The south east corner of the site is located approx. 1.9km west of the A449 Stafford Road, whilst J2, M54 is located approx. 3.5km north east of the site.</li> </ul>		
Sequential test	The site is in the Green Belt and therefore is not a sequentially preferable location.		
Green Belt harm	High.		
Landscape sensitivity	Moderate.		
Impact on historic environment	HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul> <li>Site has sloped topography towards existing industrial area / River Penk.</li> <li>The includes historical monument (Pillbox) in situ.</li> </ul>		
	<ul> <li>South eastern edge of the site abuts residential area whose amenity will need to be addressed.</li> </ul>		
	<ul> <li>Pendeford Wood Ancient Woodland is located approx. 35m north east of the site across the Wobaston Road.</li> </ul>		
	<ul> <li>Flood Zones 2 and 3 loca western boundary.</li> </ul>	ited between 20m-75m wit	hin the site along its

	<ul> <li>Both Wobaston Road (to the north of the site) and The Droveway (to the south of the site) provide well-lit pedestrian and vehicular access to/from Codsall / Bilbrook and Wolverhampton.</li> <li>Majority of the site is located within Mineral Safeguarding Area except for approx. 0.1km² of the north eastern corner of the site.</li> <li>Site is not as well connected to motorway network as other sites and access could pose problems for HGVs.</li> <li>LLFA comments         Low risk.     </li> </ul>
Site opportunities	<ul> <li>Cycle path located along Wobaston Road.</li> <li>The site is strongly bounded on all sides and provides a regular shape for development. The site is bounded by the existing employment areas to its west (Balliol Business Park) and north east (Pendeford Business Park). By residential development to its south east (Wolverhampton urban area), by Wobaston Road to the north and open green space to the south.</li> <li>A small part of the site is an operation farm and children's home with an existing access road leading to those through the site.</li> <li>Site could attract multiple occupiers by servicing both industrial and office sectors and therefore is attractive to a wide variety of uses.</li> <li>Due to being located adjacent to Wolverhampton and near to a number of existing employment areas, access to workforce is not considered to</li> </ul>
Proposed for allocation	be problematic.  No. The site performs relatively poorly with the sites topography and highway concerns are considered key constraints. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the District.  The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.
	A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).

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 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	50		
Assessment score	The western half of the site is les	atad within Canadan David	
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.		
	<ul> <li>The nearest bus stop which hosts an hourly or better bus service is located adjacent the site along Wolverhampton Road.</li> <li>The nearest railway station is Cannock, located approx. 3.7km north east of the site.</li> <li>The A460 Lodge Lane is located adjacent the eastern boundary of the site whilst the A4601 Wolverhampton Road is located adjacent the western boundary of the site. Junction T8, M6 Toll is located approx. 0.6km south</li> </ul>		
Sequential test	of the site. J11, M6 is loc The site is in the Green Belt and t	ated approx. 2.6km south or	
ocquential test	location.	incretore is not a sequentia	iny preferable
Green Belt harm	Very High and High		
Landscape sensitivity	Low – Moderate.		
Impact on historic environment	HESA scores the site a green for both direct and indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.		
Known site constraints	<ul> <li>Potential for residential amenity issues associated with cluster of dwellings to the west of A4601.</li> </ul>		

- 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.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).

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	delivering employment floor the landscape criteria, due to The full assessment of all mi	Major positive effects are predicted against the economy criteria due to the sit delivering employment floorspace. Major negative effects are predicted agains 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 i South Staffordshire Local Pla		oility Appraisal of the								
Economic Land Availability Assessment score		The site was deemed unsuitable in the EDNA2									
Policy area and access to infrastructure	Wombourne Enterprise Park	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.									
	located approx. 0.5k  The site is located approx.	<ul> <li>The nearest bus stop which hosts an hourly or better bus service is located approx. 0.5km east of the site along Brickbridge Lane.</li> <li>The site is located approx. 2.7km north west of the A449 Stourbridge Road. The nearest motorway junction is over 15km from the site.</li> </ul>									
Sequential test	The site is a Previously Deve	loped Land site in the Gree	n Belt.								
Green Belt harm	Moderate – High.										
Landscape sensitivity	Unreviewed by Landscape Se built-up area alongside adjac		as considered as part of								
Impact on historic environment	HESA scores the site a green historic environment, indicate although archaeological miti	ting no concerns identified	, on current evidence,								
Known site constraints	<ul><li>Remediation costs ic sewage works.</li><li>New access infrastru</li></ul>	•	us use of the site as								
	B4176 Bridgnorth Ro to the site.	<ul> <li>Flood zones 2 + 3 located in the central area of the site.</li> <li>B4176 Bridgnorth Road provides well-lit pedestrian and vehicular access to the site.</li> <li>Entire site located within a Mineral Safeguarding Area.</li> </ul>									
	LLFA comments  Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.										

	County Highways assessment							
C'Harana and a c'Hara	Initial concerns with achieving two way access and junction with B4176							
Site opportunities	<ul> <li>Cycle route located along B4176 Bridgnorth adjacent to the northern boundary of the site.</li> <li>Wombourne39 Public Right of Way runs adjacent the eastern boundary of the site.</li> <li>The site fits very well into the existing urban area with existing employment areas bounding the site towards both its eastern and western boundaries – there are tree rows acting as a narrow buffer to separate these. The northern boundary of the site is well defined by the B4176 Bridgnorth Road, whilst the southern boundary of the site is defined by a small wooded area approx. 75m in depth before opening onto a scattering of residential properties.</li> <li>The entire site is considered to be brownfield owing to its previous use as a sewage works.</li> <li>Neighbouring employment areas are popular commercial trading area and well occupied by large operators.</li> <li>The site is currently being marketed but does not appear to have an immediate buyer.</li> <li>Significant investment is required to bring the site into serviceable plot(s).</li> <li>The site is well located in a commercially active location so no</li> </ul>							
	anticipated problems with access to workforce.							
Proposed for allocation	<b>No.</b> 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.							
	The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.							
	A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS) although this site is not within one of the broad locations identified in that study. Furthermore, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). In addition, this site is not strategic in scale.							

Site reference	E56	Address	Land at Wall Heath.							
Site size (ha)	80.66	Proposed use	E(g) – Office or Ligh 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 landscape criteria.	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	53	53								
Policy area and access to infrastructure	Himley Parish. Approx. 1.4km no Estate Strategic Employment Site area located within Dudley Boron.  The nearest bus stop wh adjacent the eastern boundary of the eastern boundary of	<ul> <li>The eastern boundary of the site is located adjacent A449</li> <li>Wolverhampton Road, whilst J2, M5 is located over 10km south east of</li> </ul>								
Sequential test	The site is in the Green Belt and location.	therefore is not a sequentia	ally preferable							
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 his significant effects which cannot be	erns identified, on current or res may be required. The Harm to the historic environ	evidence, although IESA scores the site ment, indicating no							
Known site constraints	<ul><li>land.</li><li>Access to the site is relia currently lined by mature</li></ul>	would result in a significan nt on bridge cutting across e 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.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS) although this site is not within one of the broad locations identified in that study. Furthermore, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).

Site reference	E57	Address	Land at Mount							
Site size (ha)	2.6	Proposed use	Pleasant, Dunston.  E(g) – Office or Light Industrial.							
Site selection criteria	Assessment									
SA findings	The full assessment of all minor a effects arising from the site is available.	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	<ul> <li>The site is located within Acton Trussell and Bednall Parish on the adjacent side of the A449 from Acton Gate and Acton Plaza Strategic Employment Sites.</li> <li>The nearest bus stop which hosts a regular bus service is located adjacent the western boundary of the site along A449.</li> <li>The nearest railway station is located approx. 4.8km north of the site at Stafford.</li> <li>The A449 is located adjacent the western boundary of the site, whilst J13, M6 is located approx. 0.5km south of the site.</li> </ul>									
Sequential test	Site is designated Open Countrys Green Belt site options.		referable to other							
Green Belt harm	Site located entirely within desig	nated 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	<ul> <li>Development of the site</li> <li>Flood Zones 2 + 3 are loc</li> <li>The A449 provides a wel</li> </ul>	ues with farm located to the would require limited loss ated along the western bo I-lit pedestrian access to the ad within a Mineral Safegua	of agricultural land. undary of the site. e site.							
Site opportunities	Low risk.  County Highways assessment Initial concerns with achieving su  The site provides a regulexisting infrastructure. To	itable access off A449 ar shape for development a he A449 provides strong de coundaries 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 allocation

**No.** The site performs relatively well and has a clear advantage of being close to Junction 13 of the M6 as well as an existing employment area, and the site is not in the Green Belt. However there are initial highways concerns relating to the potential site access.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, this site is not strategic in scale.

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	delivering employment flo	minor and major positive an te is available in the Sustaina	d negative sustainability							
Economic Land Availability Assessment score	54	Tall Neview.								
Policy area and access to infrastructure	<ul> <li>within close proximity of J</li> <li>The nearest bus st</li> <li>the A449 approx</li> <li>The nearest railway</li> <li>Cannock.</li> </ul>	<ul> <li>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.</li> <li>The nearest bus stop which hosts a regular bus service is located along the A449 approx 4.7km away</li> <li>The nearest railway station is located approx. 6.7km east of the site at Cannock.</li> <li>The site is in close proximity to the proposed West Midlands Interchange.</li> </ul>								
Sequential test	The site is within the Gree therefore sequentially the	n Belt and is not previously least preferable.	developed land so is							
Green Belt harm Landscape sensitivity	The site is within the Gree 'Moderate' to 'moderate-	n Belt and assessed as havir high' rating.	ng a very high harm rating.							
Impact on historic environment	environment, indicating no present predicted. The site historic environment, indi	HESA scores the site an amber for direct potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted. The site scores a green for indirect potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required.								
Known site constraints	<ul><li>The site borders a</li><li>Majority of the sit</li></ul>	nt to two SBI's (Gailey Reserv ncient woodland to the nort e is within an area of high ha apping indicates should be a	th. abitat distinctiveness,							

### 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.

The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.

A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).

Site reference	E59	Address	Land north of								
Site reference		Address	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 pred delivering employment floors, the landscape criteria, due to the landscape criteria and the full assessment of all mind effects arising from the site is South Staffordshire Local Plan	pace. Major negative effect the site's Green Belt harm or and major positive and i available in the Sustainabi	rts are predicted against . negative sustainability								
Economic Land Availability Assessment score	47	47									
Policy area and access to infrastructure	<ul><li>The site would benefi</li><li>A regular bus service r</li></ul>	<ul> <li>The site is located on the western edge of Huntington.</li> <li>The site would benefit from being close to the A34 (Stafford Road).</li> <li>A regular bus service runs along the A34.</li> <li>The nearest train station is around 2 miles away at Hednesford.</li> </ul>									
Sequential test	The site is open land within the preferable category of site.	e Green belt therefore sec	quentially the least								
Green Belt harm	High										
Landscape sensitivity	Moderate										
Impact on historic environment	The site scores green for direct environment, indicating no coarchaeological mitigation mea	ncerns identified, on curre									
Known site constraints	<ul> <li>The site adjoins an are mapping indicates sho</li> <li>A bridleway and public</li> <li>Site is irregular in shap natural field boundarie</li> </ul>	<ul> <li>An SBI is within close proximity to the south of the site.</li> <li>The site adjoins an area of high habitat distinctiveness, which the NRN mapping indicates should be avoided for development</li> <li>A bridleway and public rights of way runs through the site.</li> <li>Site is irregular in shape with some of its boundaries not running along natural field boundaries.</li> </ul>									
	LLFA comments -	- LLFA COMMENTS									
	County Highways assessment										

	Consideration will need to be given to whether a suitable access can be provided.
Site opportunities	<ul> <li>The site would provide employment opportunities on the edge of Huntington, a tier 2 village.</li> <li>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.     </li> </ul>
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.  The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.  A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13). In addition, this site is not strategic in scale.
	Balancing the above factors, the site is not proposed for allocation.

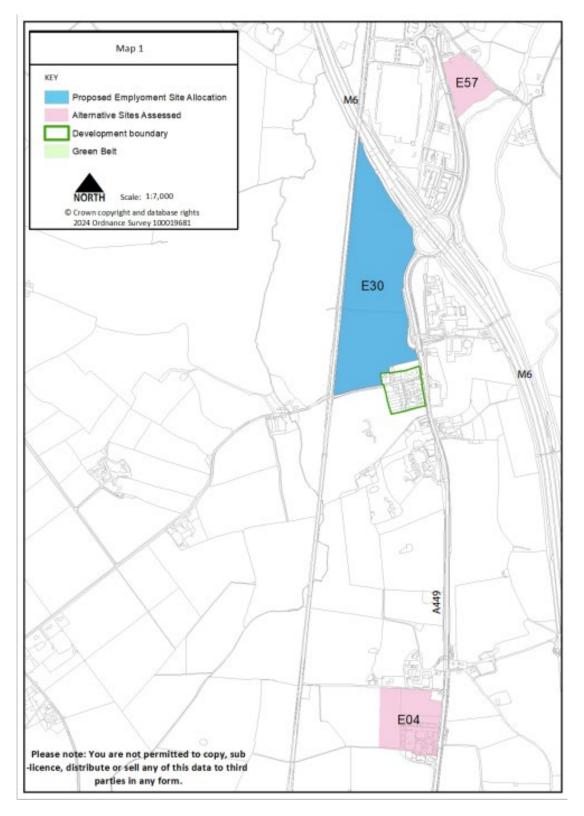
Site reference	E60	Address	Land north of the								
Site reference	E60	Address	Land north of the A5, Gailey								
Site size (ha)	35	Proposed use	E(g): office, light industrial and R&D B2: General Industrial B8: Storage and Distribution								
Site selection criteria	Assessment										
SA findings	Major positive effects are predict delivering employment floorspace the landscape criteria, due to the The full assessment of all minor 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 neg ailable in the Sustainability	re predicted against ative sustainability								
Economic Land	56										
Availability											
Assessment score											
Policy area and access to infrastructure	The site is located within Penkric to the strategic highway networl (at Junction 12) and A449.		-								
	away.  • The nearest bus stop wit	ion is at Penkridge which is th a regular service is 1km a proposed West Midlands In	way along the A449.								
Sequential test	Site is open land within the Gree preferable site option.	n Belt and therefore seque	ntially the least								
Green Belt harm	High										
Landscape sensitivity	Low – moderate										
Impact on historic environment	HESA scores the site an amber for environment and red for indirect that the proposed allocation can changing the context within which experienced, and that this predict	t impacts. This is due to the not be accommodated with the Canal Conservation A	degree of chance nout fundamentally Area would be								
Known site											
constraints	The Canal conservation area runs between the two land parcels.										
	LLFA comments										
	-										

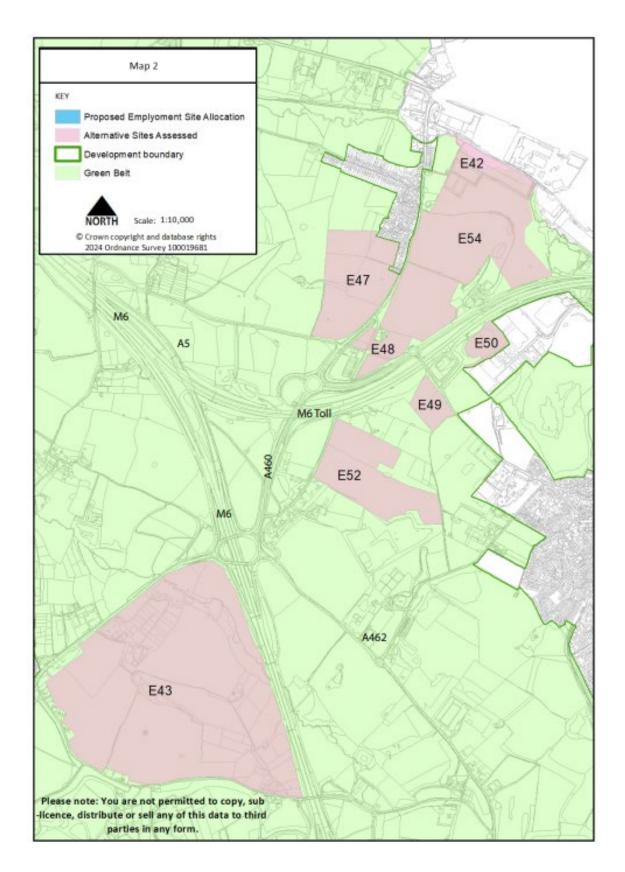
	County Highways assessment								
	Consideration would need to be given to site access and well as the impacts on the surrounding highway network including cumulatively with the adjacent West Midlands Interchange. Consultation with National Highways would be required.								
Site opportunities	<ul> <li>The site has clear distribution/logistics benefits through being close to the M6 (J12) and the West Midland Interchange proposal.</li> <li>The site would offer opportunities for the expansion of existing businesses or a location for new businesses within the district.</li> <li>The scale of the site gives it the potential to be strategic in nature.</li> <li>Supply chain opportunities exist relating to the proximity of the site to all of i54, ROF Featherstone, Hilton Cross and Four Ashes.</li> </ul>								
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.  The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing								
	further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.  A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the								
	substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).  Balancing the above factors, the site is not proposed for allocation.								

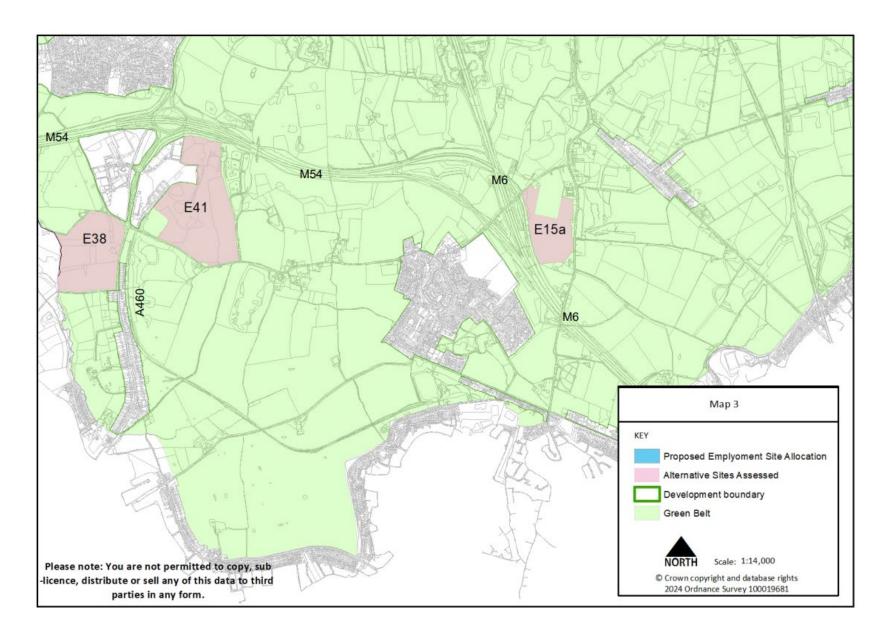
Site reference	E61	Address	Pendeford Hall Lane							
Site size (ha)	29.1	Proposed use	E(g): office, light industrial and R&D B2: General Industrial B8: Storage and Distribution							
Site selection criteria	Assessment									
SA findings	Major positive effects are predict delivering employment floorspace the landscape criteria, due to the The full assessment of all minor a effects arising from the site is avecaged.	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	50	50								
Policy area and access to infrastructure	<ul> <li>The site has nearby acce although sections of the access them.</li> <li>The site would be within although it would not lik</li> <li>The nearest railway stati</li> </ul>	<ul> <li>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.</li> <li>The site would be within close proximity to the I54 business park although it would not likely be functionally connected.</li> <li>The nearest railway station is Bilbrook approx. 3.3km away</li> <li>The near bus stop with a regular service is approx. 2.1km away along the</li> </ul>								
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 i accommodated on this site with both the character and setting of Conservation Area. The northern medium for indirect impact.	t is unlikely that developme out it resulting in an adverse f the Staffordshire and Wor parcel (b) scores low for di	ent can be e material change to cestershire Canal							
Known site constraints		s within flood zones 2 & 3. orcestershire Canal Consen	vation Area runs to							

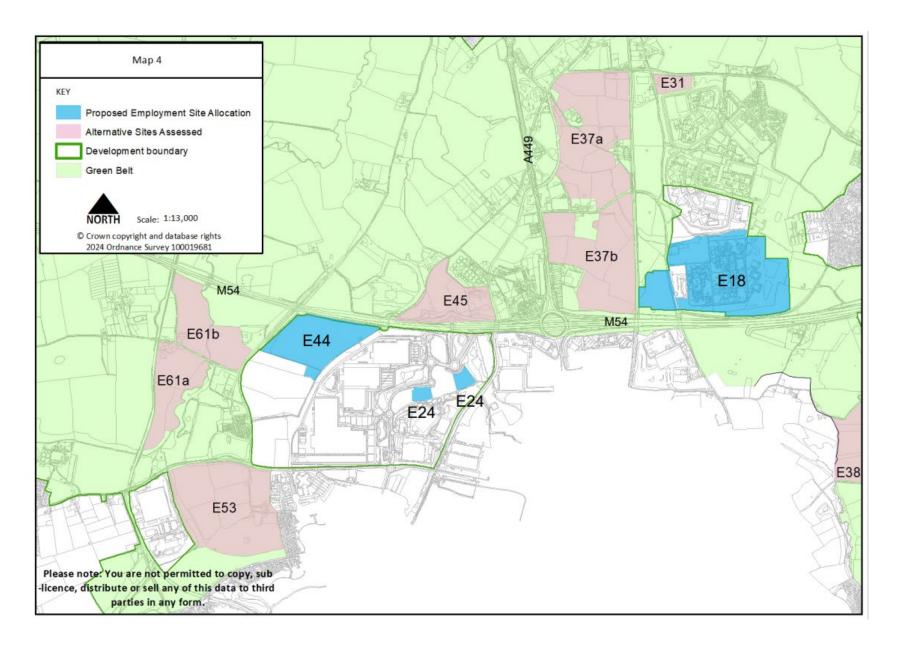
	LLFA comments
	-
	County Highways assessment
	There are concerns raised around potential sustainable transport options to the site as well as the potential impact upon the local highway network including surrounding junctions.
Site opportunities	<ul> <li>The site is relatively nearby the M54 (junction 2) and the A449.</li> <li>The site is also located nearby the I54 Business Park but would not likely be able to be functionally joined.</li> <li>The site would offer opportunities for the expansion of existing businesses or a location for new businesses within the district.</li> </ul>
Proposed for	No. Site performs relatively poorly with a number of constraints including flood
allocation?	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.
	The supply/demand balance in the EDNA update 2024 indicates that South Staffordshire's local needs can be met and that there is a 27.6ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. When also factoring in the proposed new allocation at M6, Junction 13, this results in a potential significant contribution of 112.2ha (inc. minimum WMI contribution) available for export to the unmet needs of the Black Country FEMA.
	A need for strategic scale logistics and manufacturing across the wider region has been determined through the West Midlands Strategic Employment Sites Study (WMSESS). However, the site is in the Green Belt and it is the Council's choice not to release further Green Belt for employment land at this current time given the substantial pipeline of strategic employment land in the district, including an opportunity to allocate a further strategic site on non-Green Belt land (M6, Junction 13).
	Balancing the above factors, the site is not proposed for allocation.

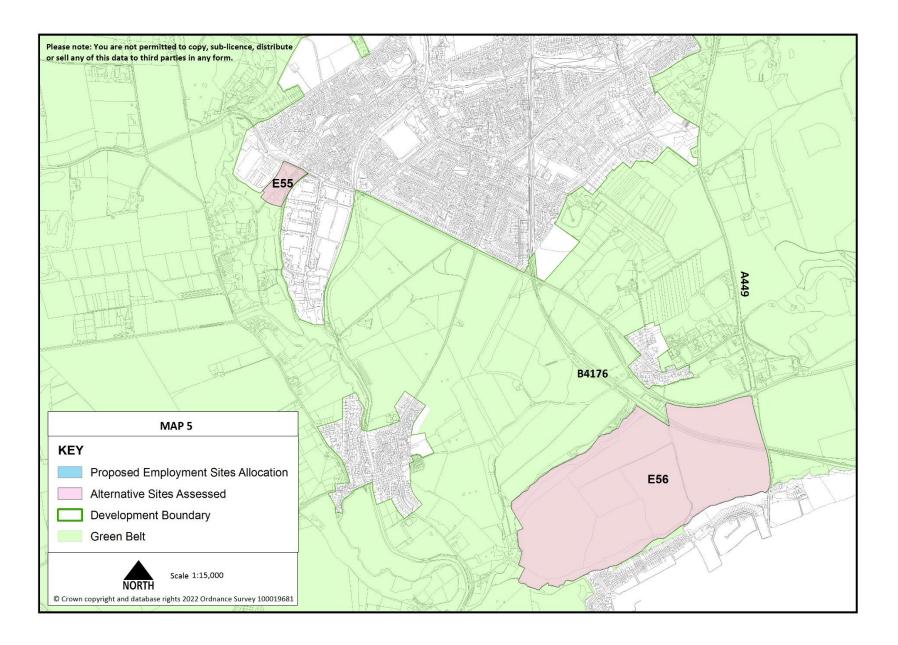
## **Appendix B: Maps of employment site options**

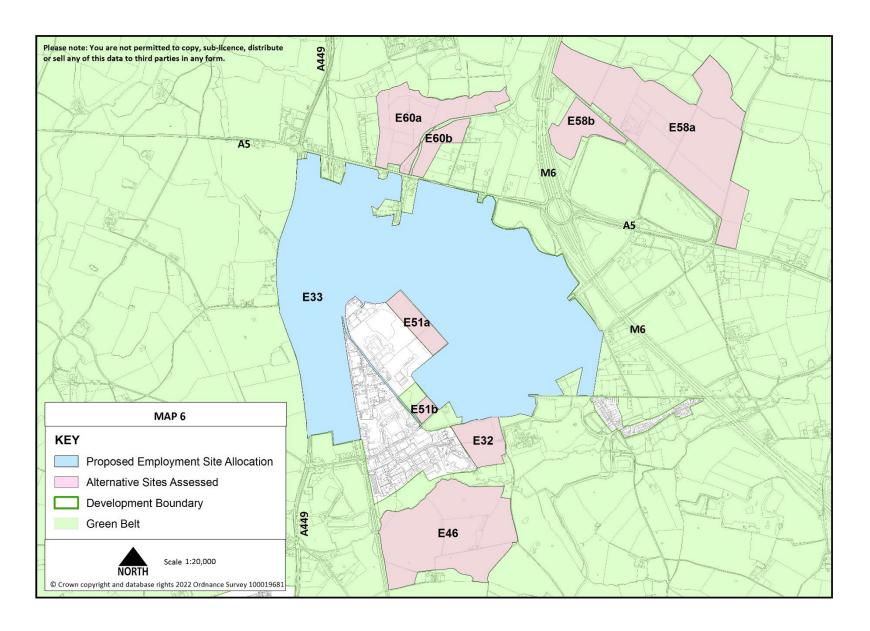


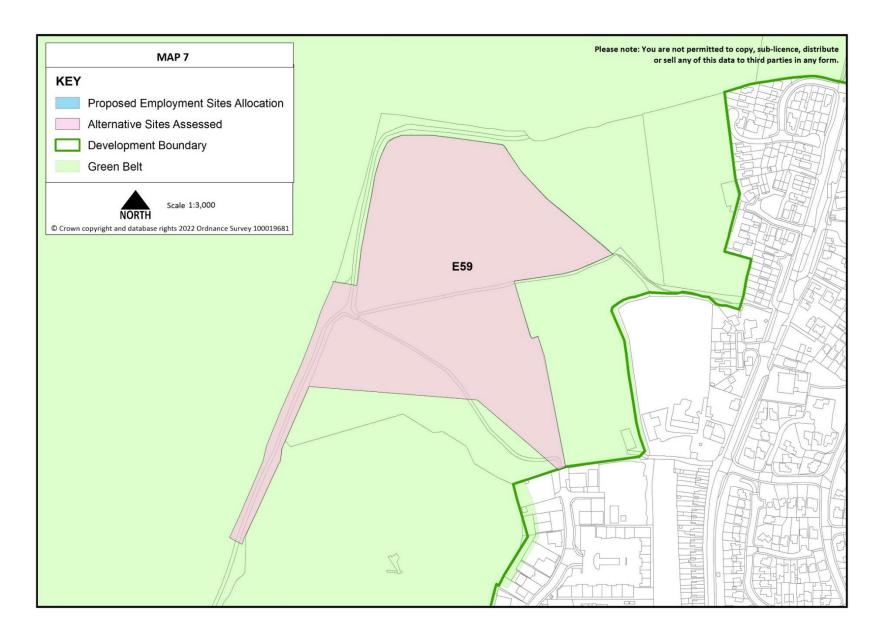












## **Appendix C: ELAA site scores**

C		Site Assessment Criteria																							
Site		Market	Attractive	ness					Sustaina	ble Devel	opment							Strategic Planning Considerations							All Criteria
Reference		Market Activity / Develope r Interest	Developmen t Constraints		Accessibilit y	Site Condition	Quality of Surroundin 9 Environme nt	Market Attractive ness Total	Location	Developed /	Public Transport Accessibility	Estimated Impact on Environment / Biodiversity	Suitability for Growth Sectors	Suitability fo employment development (including all possible uses	& benefits of other	Proximity to workforce with suitable skill and qualification characteristi cs	Sustainabilit y Total		Specific user/use	Regeneration Corridor/Development proposals	to Economic	Importance to Economic Development Activities (SEP)	Neighbourin g Uses	Strategic Planning Score Total	
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	41	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	ig.	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	ntryside	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		3	4	5	5	5	22	76
E33	West Midlands Interchange	5	3	4	5	3	4	24	5	2	3	2	5	5	3	3	28	Ō	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	nec	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	ď	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	elt 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	Bel	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	e e	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	g.e	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	ē	3	3	3	3	5	17	60
E30	Land South of Junction 13 of the M6	2	3	1	4	4	4	18	2	0	5	3	4	4	4	3	25	tes 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 tio	3	3	3	1	5	15	58
E37	Land between ROF Freatherstone and the A4	2	2	1	3	3	3	14	5	0	5	3	2	3	3	3	24	se	3	3	5	5	3	19	57
E38	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	cting	3	2	3	1	4	13	56
E6o	Land north of A5, Gailey	2	3	1	5	3	3	17	5	0	3	3	4	3	3	3	24	Έ	3	3	3	3	3	15	56
E31	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	aff.	3	2	3	1	3	12	54
E58	Land at Gailey Lea Farm	2	3	1	5	3	3	17	1	0	3	3	4	5	3	3	22	ıts i	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	ie Lie	3	3	3	3	3	15	54
E56	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	00	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	.ŏ	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	policy	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	cipal I	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	ig.	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	ji.	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