

# CANNOCK CHASE LOCAL PLAN PREFERRED OPTIONS REPRESENTATIONS

On behalf of St. Modwen Industrial & Logistics



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Cannock Chase Local Plan  
Preferred Options  
Representations  
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## REPORT

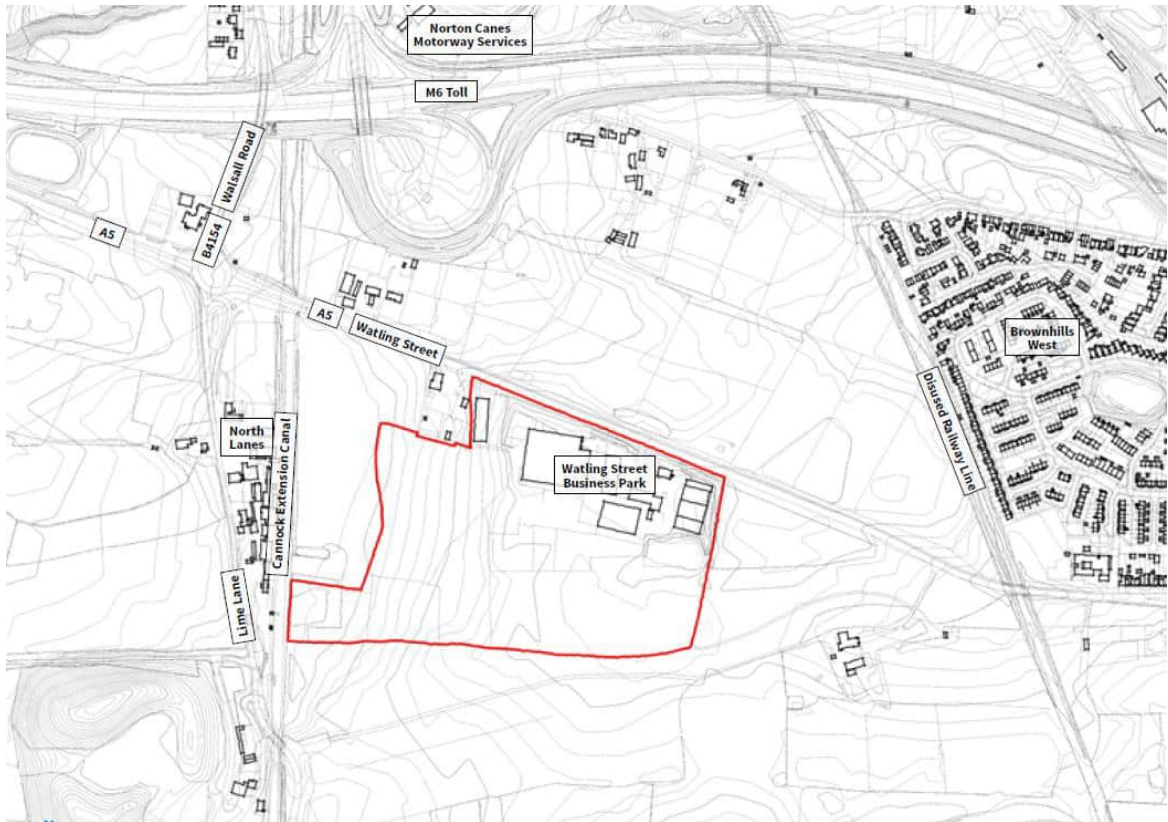
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# 1 INTRODUCTION

1.1 RPS Consulting Services Ltd (RPS) are instructed by St. Modwen Industrial and Logistics (St. Modwen) to represent their interests in the context of the preferred options consultation on the Cannock Chase Local Plan (the Plan) with regards to the Watling Street Business Park and adjacent land (collectively the Site and referred to elsewhere as CE20) which is within their sole ownership. **Figure 1.1** below shows the boundary of the Site.

**Figure 1.1: Site Boundary**



1.2 RPS and St. Modwen welcome the progress being made by the Cannock Chase District Council (the Council) in preparing the Plan. However, we are concerned that by omitting the Site the Plan is not taking advantage of all opportunities to secure the most positive future for the residents and businesses of the District and based on the evidence base would appear to represent an unsound approach

1.3 In particular we consider the proposed employment land requirement to be unjustified and suggest that a higher employment land requirement would maximise the potential of the advantages offered by the Districts excellent connectivity, as well as capitalising on the significant infrastructure being delivered nearby including the West Midlands Interchange and the M6/M54/M6 Toll link road. We also note that there is expected to be significant shortfall in the ability of the Black Country to meet its employment land requirement and to discharge its responsibilities under the Duty to Co-operate suggest that the Council need to seek to accommodate some of this unmet need.

- 1.4 We note that the Site is currently located within the Green Belt, however having undertaken a Site Specific Green Belt Assessment (see **Appendix C**) and having regard to the Council's previous detailed Green Belt assessment of the site, which has not been undertaken at this stage we consider the harm to the purposes of the Green Belt that would be caused by the release of the Site to be very low. We have also identified inconsistencies in the Sustainability Appraisal and recommend how they can be addressed.
- 1.5 RPS and St. Modwen welcome the proposed policy seeking to safeguard existing employment sites for employment uses, including the existing Watling Street Business Park, however we consider that the proposed policy could be strengthened by explicitly stating that the redevelopment of these sites for employment purposes will be supported, particular where, as in the case of the Watling Street Business Park, it is catering for a sector of the employment market that is not being addressed by other sites
- 1.6 We set out our detailed comments on these points in the following sections of this document:
- Employment Land Requirement
  - Comments on the Sustainability Appraisal
  - Green Belt Assessment
  - Potential of the Site
  - Policy SO4.1 Safeguarding Existing Employment Areas for Employment Uses

## 2 EMPLOYMENT LAND REQUIREMENT

### Question 20: Do you support the preferred policy direction to provide land for new employment uses?

#### Approach to assessing employment land requirement

- 2.1 Supporting these representations is Appendix A which consists of a technical note that reviews the approach taken by the Cannock Chase Economic Development Needs Assessment 2018 and the 2020 update (2018 EDNA and 2020 EDNA), both prepared by Lichfields, to assessing the employment land requirement for the Plan against the Planning Practice Guidance.
- 2.2 A number of concerns are identified, namely:
- A lack of assessment of the locational and premises requirements of particular types of businesses contrary to paragraph 026 of the PPG (reference ID: 2a-026-20190220);
  - Failure to provide evidence of engaging adequately with developers in assessing market demand contrary to paragraph 026 of the PPG (reference ID: 2a-026-20190220);
  - Failure to collaborate sufficiently with other authorities, infrastructure providers and other interests with regards to strategic logistics facilities contrary to paragraph 031 of the PPG 031 (Reference ID: 2a-031-20190722); and
  - Failure to assess the extent to which land and policy support is needed for other forms of industrial and logistics requirements, including the needs of SMEs and 'last mile' facilities contrary to paragraph 031 of the PPG 031 (Reference ID: 2a-031-20190722).
- 2.3 Given the issues identified RPS contend that the 2020 and 2018 EDNAs do not accord with the guidance in the PPG and so are not a complete evidence base for assessing the employment land requirement of the plan. Accordingly, the proposed employment land policies in the plan cannot be considered to be justified based on the currently available evidence, although RPS consider that this can be easily resolved through a further update to the EDNA.
- 2.4 RPS also note that while some consideration has been given to market signals by the 2020 EDNA that the evidence presented on this point is relatively limited. To assist with this matter St. Modwen will instruct further work to specifically consider demand and market signals which will be provided to the Council as soon as it is available.

#### General case for increased requirement at local level

- 2.5 Policy SO4.2 'Provision for New Employment Uses' states that the Plan will provide for up to 50 ha of land for office, manufacturing and distribution employment development during the period to 2038. Of this the policy identifies 10 employment sites to be allocated that amount to 27 ha. Paragraph 6.281 states that sites are available within existing employment areas identified in table G which

total approximately 16 ha. Paragraph 6.276 notes that the Employment Land Availability Assessment 2020 (ELAA) identifies that there have been 12.47 ha of employment land completed since 2018. Although not explicitly stated anywhere in the Plan RPS assume that this means that collectively over the plan period of 2018 to 2038 provision is being made for 55.47 ha of employment land, which is in excess of the up to 50 ha requirement set out in policy SO4.2.

- 2.6 Given that it appears that a supply of 55.47 ha including completions has been identified the policy requirement should be updated to reflect this, although RPS recommend that in fact the Council should be planning positively and seeking to plan for at least the upper end of the requirement in relation to their own needs. The 2020 EDNA states that this is 66 ha net between 2018 and 2038 (including flexibility) before consideration is given to adjustments for addressing losses and a contribution to meeting unmet need arising from the Black Country. However as noted above, limited evidence of market demand has been considered by the 2020 in reaching this conclusion.

## **Treatment of losses**

- 2.7 Loss of employment land and premises to other uses is an important factor that must be considered when preparing employment land policies. Whether it is allocated land for employment development, or existing employment premises the loss of employment land can have a substantial impact on employment land supply and result in much lower levels of employment growth than are planned for. This is particularly the case given the greater values that alternative uses attract mean that the market is incentivised to seek non-policy compliant development on employment land.
- 2.8 As such RPS welcome the assessment in the 2020 EDNA of the potential amount of employment land that may be lost over the plan period. As paragraph 5.80 of the 2020 EDNA notes factoring in an allowance for the replacement of future losses of employment space to other uses over the plan period is a widely accepted approach to planning for future employment land needs.
- 2.9 RPS strongly recommend (to avoid Soundness issues) allowing for loss replacement in the employment land requirement. We also suggest that contrary to the advice in the 2020 EDNA, that a higher allowance for losses should be identified. While we note that factoring an element of future losses is not an exact science, as noted by paragraph 5.91 of the 2020 EDNA, we do not agree with the conclusion that the lowest estimate based on trends should be utilised given that the two other methods of assessing the scale of future losses based on sites identified in the SHLAA or the replacement of 0.5% of existing stock both result in higher and similar figures of 0.9 ha per year and 0.96 ha per year respectively. On the basis of the evidence provided RPS suggest that a higher figure is justified. RPS recommend that the upper figure of 0.96 ha per annum is used which over the 20 year plan period equates to 19.2 ha.
- 2.10 RPS note that it is not apparent that the Council have chosen to incorporate a loss factor when proposing the employment land requirement in policy SO4.2, despite the advice in the 2020 EDNA. Should an allowance for the replacement of losses be made by the Council in identifying the employment land requirement for the Plan this should be set out clearly in the reasoned justification to ensure that the plan is justified and therefore sound.

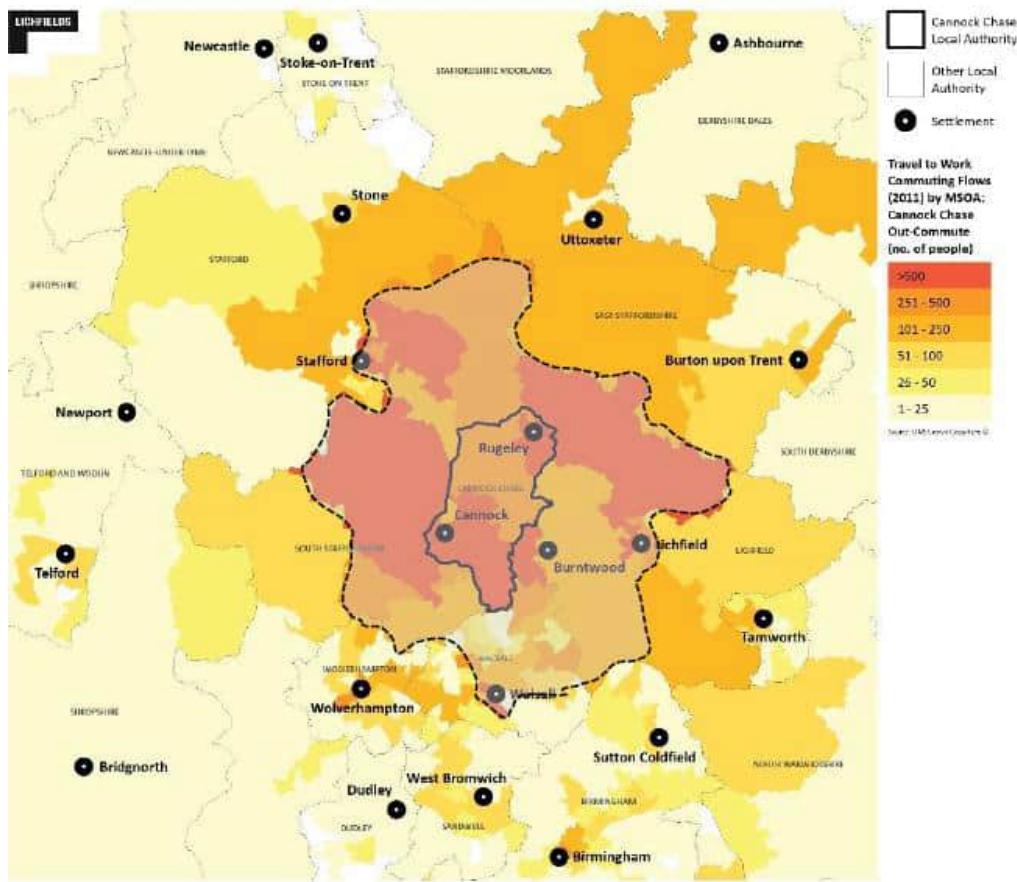


## Unmet need from neighbouring authorities

### Duty to Co-operate

- 2.11 RPS note that paragraph 4.10 of the Plan refers to working with neighbouring authorities in accordance with the Duty to Co-operate in relation to the cross-boundary issue of unmet employment need. However, the wording of this statement appears to indicate that the Council are seeking to export employment land need arising from Cannock Chase District to authorities within the functional economic market area rather than accommodate employment land need arising from these same authorities. It states:
- “Discussions will continue with our Duty to Co-operate partners to ascertain potential assistance to meet unidentified need for employment land within the authorities which share our functional economic market area.”*
- 2.12 This brings into further question how the 50 ha employment land requirement identified in policy SO4.2 has been arrived at. It is unclear if the Council are proposing that the employment land requirement for the District is higher than 50 ha and so they are seeking to request that authorities within the functional economic market area accommodate a quantity above this and if so what this quantity is. Alternatively this statement could be construed as the Council signalling that they may seek to export an element of the 50 ha, although this is assumed to be unlikely given that the Plan identifies sites capable of meeting the 50 ha within Cannock when post 2018 completions are taken into account. Fundamentally, however this demonstrates further that the approach to employment land has not been adequately justified and so the Plan as drafted is unsound.
- 2.13 RPS suggest that instead of seeking to export an element of the District’s employment land requirement, **the Council should be considering opportunities to accommodate unmet employment land requirements arising from authorities within the function economic market area.** RPS note that paragraph 3.108 of the 2018 EDNA states that the Black Country have asked that the Cannock Chase Local Plan considers opportunities to assist the Black Country in accommodating a proportion of their unmet need for employment land.
- 2.14 Paragraph 3.124 of the 2018 EDNA suggests that Cannock Chase District is within a functional economic market area that predominantly aligns with Cannock Chase’s administrative boundary; an eastwards expansion into Burntwood and Lichfield City itself; a southern expansion towards Walsall Town; a northern expansion into Stafford (including Stafford Town) and a western expansion into South Staffordshire that includes Four Ashes. Paragraph 3.126 of the 2018 EDNA states that links beyond this area are also clearly important, and there are significant overlaps between other functional economic market areas across the wider region, particularly with the Black Country functional economic market area to the south. **Figure 2.1** below taken from the 2018 EDNA shows the extent of this indicative functional economic market area:

Figure 2.1: Indicative Functional Economic Market Area



Source: ONS (2011) / Lichfields analysis

- 2.15 Given that the indicative functional economic market area includes part of the Black Country and overlaps with the Black Country functional economic market area it is clear that the Council should consider meeting unmet need arising from the Black Country.
- 2.16 The Black Country EDNA 2017 identified a potential shortfall in employment land supply versus demand of between 270 ha and 573 ha. The Black Country Urban Capacity Review Update (December 2019) (UCRU), updates this position and suggests that as of April 2019 the gap between identified supply and anticipated demand stood at between 283 ha and 563 ha. The report goes onto to consider potential sources of additional supply, including identified existing oversupply within South Staffordshire of circa 20 ha and a proportion of the 270 ha West Midlands Interchange at Four Ashes for which the Development Consent Order was granted by the Secretary of State for Transport in May 2020.
- 2.17 Despite these potential additional sources of supply the UCRU concluded that they will not provide sufficient capacity to meet the whole of the gap identified. The UCRU states that the gap will therefore remain significant in scale and that it cannot be accommodated within the urban areas of the Black Country or through existing supply in South Staffordshire. Given the scale of unmet employment land need anticipated to arise from the Black Country RPS suggest that it is unlikely that South Staffordshire will be able to accommodate all of this demand and that other authorities,

including Cannock Chase District Council should make a contribution towards meeting the unmet demand.

### **Market context**

- 2.18 RPS agree with observation at paragraph 3.78 of the 2018 EDNA that Cannock Chase District has excellent road links to a large proportion of the UK. The District is located near to the M6 and M6 Toll, which link directly into the Greater Birmingham urban area and encircle it, providing further linkages onto the M42, M54, M40 and M5. Lichfield City is also easily accessible via the A5 dual carriageway.
- 2.19 RPS also note that as set out at paragraph 4.6 of the 2018 EDNA that there is a significant concentration of business activity immediately to the south of Cannock Town along the A5 Corridor. This includes a considerable number of established Business Centres and Industrial Estates. Furthermore, as set out paragraph 4.5 of the 2018 EDNA there are isolated factories and distribution centres at key nodes on the strategic highways network.
- 2.20 The analysis of location quotients of economic sectors set out in paragraph 2.49 of the 2020 EDNA finds that the District has an extremely strong employment representation in Construction and Engineering; Manufacturing; Retail; Land Transport, Storage and Post; Wholesaling; and Accommodation & Food Services. Retail, Specialised Construction; Manufacturing and the B8 logistics sectors also employ very high levels of workers in absolute terms. As paragraph 2.50 of the 2020 EDNA notes this is hardly a surprising finding, given that Cannock Chase has seen very significant increase in B8 logistics developments in recent years due to its excellent position at the heart of the national Motorway network.
- 2.21 The benefits of this recent growth are illustrated by the data reported in paragraph 2.31 of the 2020 EDNA which states that since 2010 an additional 8,700 jobs were created (net) to 2018, boosting the size of the local workforce by 23% and a Compound Annual Growth Rate (CAGR) of 2.63% - a growth rate substantially higher than the West Midlands and England & Wales as a whole, for which the respective CAGR over the same period were 1.51% and 1.44% respectively.
- 2.22 Paragraph 5.103 of the 2020 EDNA also notes that growth opportunities are likely to be forthcoming from major infrastructure investment that will benefit the local logistics market over the next few years such as the West Midlands Interchange in South Staffordshire and the M6/M54/M6 Toll link road.
- 2.23 As illustrated through the regeneration scenario in the 2020 EDNA there are a number of sectors that have been identified by Strategic Economic Plans (SEPs) prepared by Stoke on Trent and Staffordshire Local Enterprise Partnership (SSLEP); the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the West Midlands Combined Authority (WMCA), which the region has an opportunity to develop a competitive advantage in. As noted by paragraph 5.42 of the 2020 EDNA, Cannock Chase District shows growth in a number of these sectors and is therefore well placed to benefit from a number of the opportunities identified in these SEPs.

- 2.24 Collectively this evidence suggests that the A5 corridor and the wider District benefits from excellent connectivity which makes it an attractive location for logistics and industrial occupiers. This is illustrated by the District's existing pattern of business activity and the sustained rapid growth of the local economy over recent years, outperforming both the West Midlands and England & Wales. Furthermore, the future opportunities for the local logistics market presented by major infrastructure investment including the West Midlands Interchange and the M6/M54/M6 Toll link road indicate that the district will continue to be an attractive location for occupiers. This indicates that the conditions are there to allow the District to capitalise on a number of the opportunities identified in the SEPs to develop a competitive advantage if an appropriate supply of employment land is readily available.
- 2.25 However, as noted by the West Midlands Land Commission the:
- “shortfall of land for employment space is at least as pressing as the shortage of land for new homes, and possibly more so”*
- The West Midlands Local Industrial Strategy also notes on page 63 that:
- “there is a challenge for incubation space as well as grow on space to support agile and mobile economic activity”*
- 2.26 There is a clear pressing need to identify new employment land across the region of all sizes and quality. RPS contends that Cannock Chase District is particularly well placed to contribute towards addressing this issue, due to the locational advantages that it has, and that there are substantial benefits on offer to the District if it is prepared to do so. However, to maximise the gains that can be realised from this opportunity the District will, in RPS's opinion, need to identify further employment land than is the case in the current version of the Plan. Failing to do so would mean that the Plan was not positively prepared and so would be unsound.
- 2.27 As noted above St. Modwen will provide further evidence regarding demand and market signals in due course. RPS anticipate that this will demonstrate that the market recognises these locational advantages.

## **Link between housing supply and employment land**

- 2.28 RPS note that one of the future labour supply scenarios tested in the 2020 EDNA consider the implications of housing delivery over the plan period on the basis of the current standard methodology figure for the District plus a contribution of 500 dwellings towards meeting unmet housing needs arising from the Black Country (301 dwellings per annum, or 6,020 dwellings over 20 years). The 2020 EDNA equates to an employment land requirement of 53.99 ha factoring in loss replacement at 0.756 ha a year.
- 2.29 We note that at paragraph 5.109 of the 2020 EDNA that Lichfields suggest that if the housing requirement is at or below the 7,020 net dwelling growth under labour supply Scenario 5 (276 dpa SM + 1,500 dwellings unmet need, i.e. 351 dpa) then this could have repercussions on the employment land target, which may have to be reduced as a consequence to ensure the two are not misaligned.

- 2.30 RPS understand from discussions with officers of the Council that it is on this basis that the employment land requirement of the Plan is proposed to be set at 50 ha.
- 2.31 RPS note that a consistent Labour Force Ratio was applied by Lichfield's in calculating the labour supply scenarios which assumes that net outward commuting patterns will persist over the plan period. RPS question this assumption as we understand that the Council are rightly seeking to reduce net outward commuting for a number of reasons, not least of which is that reducing commuting is generally acknowledged as being more sustainable. If it is assumed that net out commuting reduces over the plan period, this means that the total labour supply in the district will be greater than forecasted in the 2020 EDNA. This would mean under a labour supply based approach the District's employment land requirement would be higher than suggested in the 2020 EDNA.
- 2.32 RPS also note that increasing the supply of employment land above the labour supply restricted requirement could in fact contribute to reducing out commuting by providing greater opportunities for residents of the District for work within the District.
- 2.33 While it is beyond the scope of these particular representations to suggest what the appropriate housing requirement for the Plan should be, RPS strongly encourage the Council to plan positively and not seek to restrict the economic opportunities on offer to the District through setting the housing requirement at a level that constrains economic growth through a lack of labour supply.

### 3 THE SUSTAINABILITY APPRAISAL – WATLING STREET BUSINESS PARK

3.1 RPS note the response to our previous submissions with regards to the Sustainability Appraisal (SA) set out on pages 154-156 of the SA of the Cannock Chase Local Plan: Preferred Options. However, we note a number of inconsistencies in the assessment of the Site which we set out below.

#### SA Objective 1: Protect and enhance biodiversity, fauna and flora and geodiversity

3.2 RPS note that the score against this objective for the Site has been amended following comments received from the Canal & River Trust (CRT). Ecology Solutions have reviewed the assessment work undertaken and have provided a response addressing the points raised (**Appendix B**).

3.3 In summary although the site is located adjacent to the Cannock Extension Canal SSSI the closest proposed built development at the site is located approximately 120m from the SSSI and SAC at its closest point. Land adjacent to the SSSI would be retained as greenspace and indeed opportunities for ecological betterment could be delivered as an enhancement associated with emerging proposals.

3.4 It is noted that site NE5: Turf Field, Watling Street is located 200m from the SSSI at its closest point, but has been attributed a score of (-?) under this objective which is inconsistent with the scoring for the Site as (--?). We suggest that the scoring for the Site should be amended to (-?) accordingly.

3.5 CRT also make reference to potential adverse impacts to the towpath associated with the Cannock Extension. Use of footpath would not have the potential to result in any adverse impacts on the SAC / SSSI. Ecology Solutions note that the potential for recreational impacts on this designated site have been scoped out in the Council's own Habitats Regulations Assessment (HRA) work (March 2021). In any event, there is no reason to consider that employment sites would generate any significant increase in use along the towpath.

3.6 Through discussions with Officers RPS understand that there are concerns regarding the potential for airborne and waterborne pollution to have a negative impact on the SAC / SSSI. Further work is being undertaken with regards to these possible issues and will be provided to the Council in due course.

3.7 Ecology Solutions have also identified an issue with the methodology adopted for this objective. Subsequent HRA work has only been undertaken on Preferred Options sites. This means that there is no opportunity for other sites, including the Site, to have their true impact acknowledged, with such sites being given an artificially low score as a result.

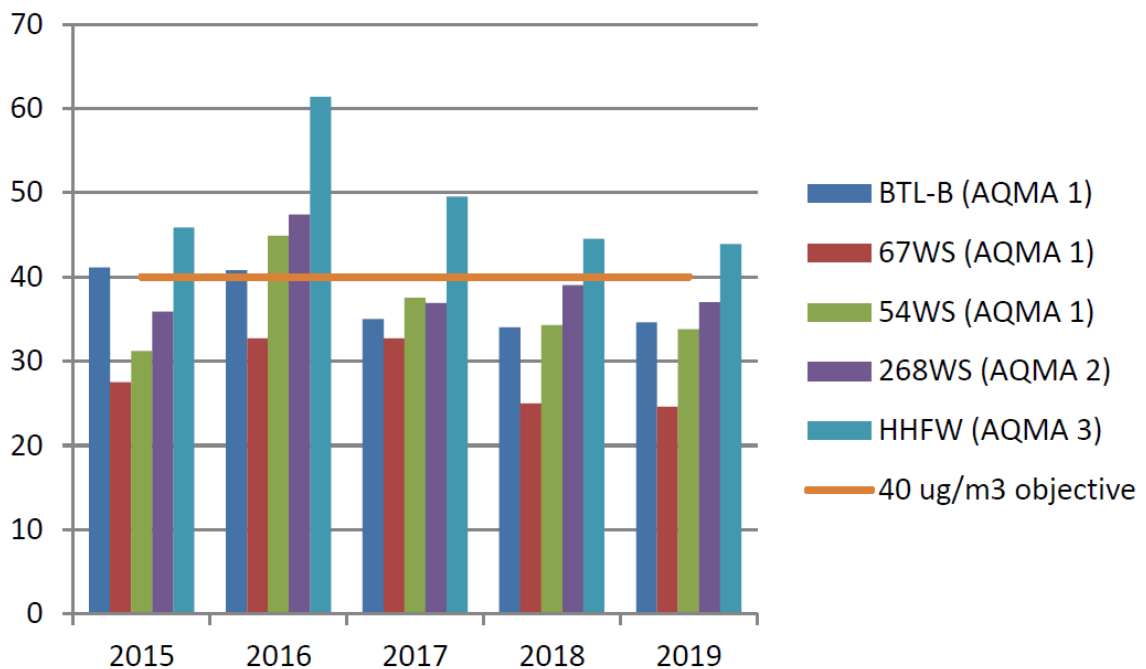
3.8 A 'shadow' HRA has been undertaken by Ecology Solutions for the emerging proposals for the Site which concludes that potential impacts on the integrity of any European Sites (including their underpinning SSSI's) would be avoided subject to the adoption of an appropriately designed

scheme. As such it can be concluded that potential adverse impacts would be avoided on any biodiversity assets, indicating that emerging proposals would, at worse, attain a neutral score under this objective.

## SA Objective 2: Minimise pollution and protect and enhance air, water, and soils

3.9 RPS are disappointed that our previous comments on this point summarised on pages 154 and 155 of the SA have been discounted. **Figure 3.1** below is taken from the Council’s 2020 Air Quality Annual Status Report.

**Figure 3.1: Monitored NO2 at residential facades and comparison with annual mean objective**



3.10 The 2020 Air Quality Annual Status Report states on page viii:

*“Over the past 3 years, only AQMA at five Ways continues to experience exceedances of the annual mean nitrogen dioxide objective. This time span allows the authority to review the necessity for AQMAs 1 and 2. A detailed assessment will now be carried to determine whether they can be revoked.”*

3.11 As such there is evidence that air quality issues continue to improve, to the point where a detailed assessment is now to be undertaken which will consider revoking the AQMAs 1 and 2 which cover the A5 corridor running through the District. Furthermore, the only AQMA to experience exceedances of the objective is not located in close proximity of the Site. While no timescales are provided for this detailed assessment, it clearly indicates that as a minimum the potential impacts on air quality of sites in the proximity of these particular AQMAs which are showing compliance with the objective should not be scored as negatively in the SA as sites in the proximity of the AQMA3.

- 3.12 RPS note that the 2020 Air Quality Annual Status Report identifies the preparation of this detailed assessment as a key priority for 2021/21 and so trust that the findings of it will be available to inform the next stages of preparation of the Plan.
- 3.13 RPS note that air quality issues in Walsall, which lies to the south of the Site, have also improved in recent years.
- 3.14 RPS also note that traditional working patterns have been disrupted by the COVID-19 pandemic with people working from home where their job allows them to. Many prominent businesses are suggesting that post pandemic home working will continue to be at least an element of the working arrangements and it is expected that the number of commuters will reduce. Should this occur it is expected that air quality issues arising from motor vehicles will similarly reduce.
- 3.15 This is particularly relevant for Cannock Chase District which as stated by paragraph 2.45 of the 2020 EDNA has 27.6% of its workforce employed in Professional Occupations compared to 20.2% across the West Midlands and 21.5% nationally. In contrast, the District has very few residents in the most elementary of occupations – just 6.4%, almost half the regional rate of 11.9% and much lower than the national rate of 10.2%. The District also has net outward commuting patterns as noted under part 4 of paragraph 5.50 of the 2020 EDNA.
- 3.16 People employed in Professional Occupations are more likely to be able to work from home either full time or as part of an agile working pattern. Therefore RPS suggest that the anticipated reduced level of commuting and reduced air quality issues is likely to have a greater impact on Cannock Chase District than in locations where a greater proportion of residents work in more elementary occupations which have greater requirements for staff to attend their workplace. The benefits of this reduction is likely to be particularly pronounced due to the high proportion of Cannock Chase residents recorded as commuting out of the District for work pre-pandemic. Furthermore, given that the A5 is a key road link out of the District is anticipated that the reduction will be particularly noticeable in the AQMA that the Site is located near to.
- 3.17 Given the above RPS consider that the scoring against this objective should be amended to be negligible.
- 3.18 RPS note that Officers have queried the anticipated volume of traffic that will be generated by the Site and the resultant impacts on air quality if the expansion land was developed. Further work is being undertaken on this matter and will be provided to the Council when it is completed.

### **SA Objective 5: Reduce the risk of flooding**

- 3.19 RPS disagree with the approach taken to the scoring of SA5: Flooding. The Environment Agency provided advice on this point as part of their consultation comments on the June 2018 SA Scoping Report which are set out on page 164 of the SA of the Cannock Chase Local Plan: Preferred Options. Specifically, they advised:



*“In order to differentiate between the impacts of fluvial flooding and surface water flooding, we recommend the assumptions are divided up to consider surface water risks based on greenfield/brownfield sites as negative and negligible impacts correspondingly (please consult the LLFA for further advice regarding this) and for then flood zones to be classified as follows for all development types:*

*Flood Zone 3a/3b – severe negative impact*

*Flood Zone 2 – negative impact*

*Flood Zone 1 – negligible impact” (emphasis added)*

- 3.20 In accordance with this advice RPS recommend that the assessment of this objective is divided into surface water and fluvial. On this basis the Site would be scored as negative against surface water and negligible against fluvial as it is in Flood Zone 1.
- 3.21 We also note that for many of the other objectives that the potential for appropriate mitigation to avoid adverse effects means that effects have been identified as uncertain. For consistency RPS recommend that the assessment of SA5 should follow the same approach. This would mean that with regards to surface water flood risk that the Site should be scored as uncertain negative and negligible for fluvial flood risk.

## **SA Objective 14: Access to services Provide easy access to community services and facilities to meet people’s needs and avoid isolation**

- 3.22 RPS note the Council’s comments with regards to access to services, however as acknowledged in the revised assessment of SA8: Sustainable Transport on page 155 of the SA of the Cannock Chase Local Plan: Preferred Options there is a cycle route along the A5. This offers a sustainable transport link to services and facilities further afield. To be consistent with the scoring given for site CE19/E12) the scoring for the Site should be revised to minor negative.

## **SA Objective 17: Conserve and enhance the built and historic environment (including heritage assets and their respective settings)**

- 3.23 The Cannock Chase Heritage Impact Assessment 2020 screened out the Site at the first stage of assessment on the basis that no significant impact on heritage would occur as a result of development (apart from the possibility of undiscovered archaeology). To be consistent with the assessment of other employment sites as set out at paragraph 4.129 of the SA of the Cannock

Chase Local Plan: Preferred Options a negligible uncertain effect should be recorded for the Site under this objective.

## SA Conclusions

3.24 On the basis of our observations set out above RPS recommend that the revised assessment of the Site should be as set out below:

**Table 3.1: Revised SA scoring for the Site**

Scoring	SA1: Biodiversity and geodiversity	SA2: Pollution	SA3: Previously development land	SA4: Climate change	SA5: Flooding	SA6: Landscape and townscape	SA7: Waste	SA8: Sustainable transport	SA9: Housing	SA10: Education	SA11: Crime	SA12: Health and wellbeing	SA13: Recreation	SA14: Services and facilities	SA15: Economy	SA16: Town centres	SA17: Historic environment
Council	-?	-	-	0	-	-?	0	-?	0	0	0	0	++	-	+	0	-?
RPS	0	0	-	0	-? 0	-?	0	-?	0	0	0	0	++	-	+	0	0?

## 4 GREEN BELT ASSESSMENT FOR WATLING STREET BUSINESS PARK

### Question 45: Do you support the preferred policy direction for protecting, conserving and enhancing the Green Belt?

- 4.1 RPS note the findings of the Cannock Chase Green Belt Harm Assessment February 2021 (the 2021 LUC Assessment). However, we strongly disagree with the inclusion of the Site within OA14 for a number of reasons as set out in the Site Specific Green Belt Assessment (the Assessment) for the Site included as **Appendix C**. The Assessment has generally been undertaken in accordance with the methodology of the 2021 LUC Assessment to aid the comparison of the results between the two. We have also drawn upon the findings of the Cannock Chase Green Belt Study (the 2016 LUC Assessment) as this did assess the undeveloped part of the Site in detail as part of a wider parcel.
- 4.2 It should be noted that while we have followed the methodology of the 2021 LUC Assessment that this should not be interpreted as RPS endorsing this approach. In particular as noted in the Assessment there are aspects of the approach taken in the LUC 2021 Assessment which are inconsistent with RPS's considerable experience of Green Belt Assessments undertaken elsewhere. We also note that while this methodology has been utilised by LUC in undertaking assessments for other Local Authorities, we are not aware that this particular approach has yet been subject to examination and found as being robust.

#### Distinction

- 4.3 As set out in in paragraphs 3.2 to 3.8 of **Appendix C** RPS disagree that the features identified for parcel BW1 amount to a strong distinction from the urban area. In particular we note that linear tree cover is given as an example of a moderate boundary feature on page 53 of the 2021 LUC Assessment. We also note that washed-over development to the north and the south of the parcel contribute to containment which reduces distinction as per paragraph 3.78 of the assessment. In relation to views paragraph 3.76 of the 2021 LUC Assessment states that caution should be used when considering views, on the basis that seasonal variations and boundary maintenance regimes can have a significant impact. Given this we question the degree to which the hedgerow structure within the parcel prevents views of the urban area and washed over development during the winter.
- 4.4 Given the points above RPS consider that parcel BW1 to only be of moderate distinction between the parcel and urban area. Accordingly, parcels beyond this including the Site should not be considered as outer areas and should be subject to more detailed site specific assessment than was undertaken as part of the 2021 LUC Green Belt Assessment.

## Inspector's Letter to Welwyn Hatfield Borough Council December 2017

- 4.5 Paragraphs 3.9 to 3.15 of **Appendix C** set out our concerns that the 2021 LUC Assessment does not follow the guidance set out in the Inspector's letter to Welwyn Hatfield Borough Council (December 2017), despite referring to it.
- 4.6 In summary we consider the assessment of outer areas to be subject to the same criticism that the Inspector raised of the phase 1 Welwyn Hatfield Green Belt Review, which is that the strategic assessment of large parcels cannot necessarily be relied upon to apply to smaller areas within large parcels. This indicates that the assessment of OA14, which was strategic in nature, should not be relied upon when considering the potential harm to the Green Belt of the release of the Site.
- 4.7 Furthermore, RPS contend that LUC have misinterpreted the Inspector's comments on the phase 2 Green Belt Review. In particular we consider that the LUC 2021 Assessment, like the Welwyn Hatfield phase 2 Green Belt Review which the Inspector was commenting on, has failed to examine all of the potential development sites adjacent to the urban areas.
- 4.8 We suggest that this is a result of LUC misinterpreting the meaning of urban areas to mean inset areas, rather than also considering urban areas that are currently washed over by the Green Belt, such as Watling Street Business Park. This is a fundamental point of principle.
- 4.9 We also contend that LUC appear have interpreted this as meaning immediately adjacent when considering distinction. This would mean that only development parcels which have no separation from urban areas would be assessed. This would exclude parcels separated from urban areas by any features such as woodland, rivers, roads etc. which would be contrary to established practice.
- 4.10 Furthermore, this is inconsistent with how adjacent is defined by paragraph 3.93 of the 2021 LUC Assessment which defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land / parcels being assessed for potential release. This is contradictory to the approach taken to distinction wherein the 2021 LUC Assessment has used the presence of a parcel that they have assessed as being strongly distinct to mean that all parcels beyond this should not be assessed at more than a high level as an outer area. Parcels such as the Site can still be in close proximity to the urban areas while not being immediately next to said urban areas.
- 4.11 As such RPS consider that the approach taken by LUC in the 2021 LUC Assessment does not reflect the approach advocated by the Inspector's Letter to Welwyn Hatfield Borough Council (December 2017). RPS contend that to be in accordance with this approach the approach to assessment should consider all potential development sites adjacent to urban areas, such as the Site.

## Site Specific Green Belt Assessment

- 4.12 In undertaking the Assessment for the Site (**Appendix C**) we have subdivided the Site into two parcels based on clear differences in terms of land use and the presence of boundary features consistent with the approach taken in the LUC 2021 Assessment. The following sections summarise the findings for these two parcels.

## Business Park Parcel

4.13 Figure 4.1 below shows the extent of the Business Park Parcel:

Figure 4.1: Business Park Parcel



- 4.14 In coming to a conclusion on the assessment of harm of releasing the Business Park Parcel from the Green Belt the Assessment notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm at the level of moderate – low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower.
- 4.15 RPS consider the Business Park Parcel to make no contributions to Purposes 1 to 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment.
- 4.16 As noted above RPS consider the Business Park Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm, then this would still result in an overall assessment of very low harm.
- 4.17 If it is considered that the Business Park Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other

sites, then at most the release of the release of the Business Park Parcel would result in moderate harm.

4.18 **Table 4.1** below provides a summary of our assessment:

**Table 4.1: Summary of findings for Business Park Parcel**

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Brownhills West	Release of Business Park Parcel	6.1	No	No	No	No	Weak	Very Low

**Expansion Land Parcel**

4.19 **Figure 4.2** below shows the extent of the Expansion Land Parcel:

**Figure 4.2: Expansion Land Parcel**



4.20 As set out above in coming to a conclusion on the assessment of harm of releasing the Expansion Land Parcel from the Green Belt the Assessment notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm

at the level of moderate – low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower.

- 4.21 RPS consider the Expansion Land Parcel to make a relatively weak contributions to Purpose 3 and no contribution to purposes 1, 2, and 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment.
- 4.22 As noted above RPS consider the Expansion Land Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm then this would still result in an overall assessment of very low harm.
- 4.23 If it is considered that the Expansion Land Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the release of the Expansion Land Parcel would result in moderate harm.
- 4.24 **Table 4.2** below provides a summary of our assessment:

**Table 4.2 Summary of findings for Expansion Land Parcel**

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Brownhills West	Release of Expansion Land Parcel	6.1	No	No	Relatively Weak	No	Weak	Very Low

## Conclusions

- 4.25 The Assessment undertaken by RPS of the level of harm of the release of both the Business Park Parcel and Expansion Land Parcel would be very low harm. As such RPS consider that, in conjunction with the exceptional circumstances associated with the need to allocate sufficient employment land, the Site should be released from the Green Belt through the Cannock Chase Local Plan.
- 4.26 RPS note that the Business Park Parcel makes no contribution to Purposes 1 to 4 of the Green Belt and only a very weak contribution to Purpose 5. On this basis even if the Expansion Land Parcel were not released from the Green Belt there is a compelling case to release the Business Park Parcel.
- 4.27 RPS also note that site NE:5 Turf Field is proposed for release from the Green Belt for development, although surrounding Green Belt land is not proposed for release. This would result in it forming an isolated employment development inset from the Green Belt. RPS consider that this provides further justification for the release of the already developed Business Park Parcel from the Green Belt.

## 5 WATLING STREET BUSINESS PARK EXPANSION LAND

- 5.1 A Vision Document has been prepared for the Site and has previously been submitted as part of previous representations. This Vision Document is attached as **Appendix D**.
- 5.2 The Vision Document sets out the potential to expand the existing Business Park in a sustainable way which meets the future requirements, expectations and aspirations of Cannock Chase District Council. The Site presents an excellent opportunity to deliver employment development within the current plan period.
- 5.3 The expansion land (5.45Ha) is situated immediately adjacent to the established Business Park and benefits from the existing access and infrastructure serving the current development. Existing business operators would be able to continue to operate with minimal disruption.
- 5.4 The Site is also very well located in relation to the strategic highways network being accessed off the A5 Watling Street and lying in close proximity to the junction with the M6 (Toll), a location attractive to the expansion of existing businesses and providing opportunity for new inward investment.
- 5.5 Proposed built development would be screened very effectively at the outset by the established framework of hedgerows, tree belts and woodland copses located along the Site's perimeter. Such features will be retained as the basis for a comprehensive Green Infrastructure framework, which encompasses the site.
- 5.6 There are no substantive environmental constraints which prohibit the expansion of the Business Park. The whole site area would measure approximately 12Ha and its removal from the Green Belt would not undermine the overall purposes and integrity of the Green Belt.
- 5.7 The landscape within which the site sits is visually enclosed by the existing Business Park and A5 Watling Street to the north, the Cannock Extension Canal to the west, and by woodland at Wyrley Common to the south.
- 5.8 The Site can deliver sustainable high quality employment development meeting the following objectives:
- Provide opportunities for employment development at a strategic location;
  - Provide development in a sustainable location extending the existing Business Park;
  - Provide development in a location without detriment to the local landscape character or visual amenities of the rights of way network;
  - Create a cohesive Green Infrastructure centred on the framework of retained hedgerows and tree belts; and
  - Existing retained features to be supplemented with new habitats maximising opportunities for biodiversity and landscape enhancement.



## **6 POLICY SO4.1 SAFEGUARDING EXISTING EMPLOYMENT AREAS FOR EMPLOYMENT USES**

### **Question 19: Do you support the preferred policy direction to safeguard existing provision for employment use?**

- 6.1 RPS welcome proposed policy SO4.1 and the associated identification of Watling Street Business Park as an area to be safeguarded for employment uses which recognises the contribution that the Site makes to providing much needed employment space within a highly accessible location.
- 6.2 However, we suggest that in order to ensure that the Plan is positively prepared that it would be beneficial if the policy were revised to expressly indicate that redevelopment of safeguarded existing employment areas for employment uses will be supported. While this is implicitly indicated by the policy, we consider that revising the policy in this manner would be beneficial and provide additional certainty to the owners and operators of these existing employment areas.

## 7 POLICY SO4.5: PROVISION FOR LOCAL EMPLOYMENT AND SKILLS

### Question 23: Do you support the preferred policy direction to provide for local employment and skills?

- 7.1 RPS note proposed policy SO4.5 and are broadly supportive of it. However, while we note that the qualifying criteria for the application of the policy is the creation of over 50 full time equivalent jobs either during the construction phase or by proposed occupiers of the development, it appears from the third paragraph of the proposed policy that the requirement will apply to both temporary and permanent jobs. It should be noted that in the case of speculative development, wherein a development is built prior to an occupier being secured, that a developer cannot reasonably enter into obligations on behalf of an unidentified occupier.
- 7.2 Should the policy apply to speculative developments it is likely to reduce the appetite of the market in undertaking such schemes as they would have to predict what obligations under an Employment and Skills Plan a potential occupier would be prepared to sign up to. This creates a risk of getting it wrong and so putting off potential occupiers. This would make the local economy more fragile as a lack of suitable available space may put off new investment from locating in the District and also may restrict the ability of local businesses to grow.
- 7.3 Furthermore, different occupiers will have different approaches to training and development. Requiring them to meet requirements determined without their involvement may result in the best outcomes not being achieved, as the Employment and Skills Plan would not be bespoke to the occupier.
- 7.4 RPS recommend that the policy is redrafted to make clear that it will only be applied to the operational phase if the end occupier is known.
- 7.5 RPS also note from experience that a number of authorities with similar policies secure the delivery of Employment and Skills Plans, or similar, both by way of planning condition and legal agreement. Generally, legal agreements are only required when there are other matters that require a legal agreement. This provides a more proportionate approach and means that the cost of preparing legal agreements is only incurred when it is necessary. Accordingly, RPS recommend that the policy is redrafted to allow for Employment and Skills Plans to be secured by way of a planning condition when appropriate.

## 8 CONCLUSIONS

- 8.1 RPS, on behalf of St. Modwen, welcome the progress that the Council are making with the preparation of the Cannock Chase Local Plan. However, we contend that the Watling Street Business Park site should be included as an allocated employment site.
- 8.2 We have identified issues with the current employment land evidence with regards to demonstrating that the approach set out in the PPG has been followed and have made suggestions as to how this can be addressed. In particular we note that limited consideration has been given to demand and market signals and so St. Modwen will instruct further work to provide evidence regarding this which will be provided to the Council in due course.
- 8.3 It is not clear from the available evidence that an allowance has been made to address likely losses of employment land over the plan period and we encourage the Council to include this within the employment land requirement to ensure that it is robust. We consider that the most appropriate allowance for losses is 0.96 ha per annum or a further 19.2 ha over the 20 year plan period.
- 8.4 We also consider there to be a compelling case for the Plan to accommodate some of the anticipated unmet need for employment land that is expected to arise from the Black Country, given the significant shortfall that has been identified through the initial evidence for the Black Country Plan. This will ensure that the Council can demonstrate that they have met the Duty to Co-operate. The District has enviable locational advantages and further sites, including the Site, should be identified along the A5 corridor which is an established industrial location to maximise the opportunities for the residents and businesses of Cannock Chase District that this provides.
- 8.5 RPS understand the employment requirement in the Plan to be based on a labour supply restricted scenario. We note that the methodology for calculating this requirement assumes out commuting continues at the same rate throughout the plan period. This would have negative sustainability implications and does not recognise that providing additional employment land above the labour supply restricted level would in fact have beneficial effects on sustainability by providing opportunities to reduce out commuting.
- 8.6 RPS have identified inconsistencies with how the Sustainability Appraisal has scored the Site in relation to the following objectives:
- SA objective 1: Protect and enhance biodiversity, fauna and flora and geodiversity
  - SA objective 2: Minimise pollution and protect and enhance air, water, and soils
  - SA objective 5: Reduce the risk of flooding
  - SA Objective 14: Access to services Provide easy access to community services and facilities to meet people's needs and avoid isolation
  - SA objective 17: Conserve and enhance the built and historic environment (including heritage assets and their respective settings)
- 8.7 Amending the scoring for the Site as we have suggested indicates that the development of the Site would be sustainable.

- 8.8 We have undertaken a Site Specific Green Belt Assessment (**Appendix C**) which demonstrates that the release of the Site from the Green Belt would only cause very low harm to the purposes of the Green Belt.
- 8.9 RPS suggest that even if the Expansion Land Parcel is not released from the Green Belt that there is a compelling case for the release of the Business Park Parcel as it does not make any contribution to Purposes 1-4 of the Green Belt and only a very weak contribution to Purpose 5. RPS also note that this would be consistent with the proposal to release site NE:5 Turf Field.
- 8.10 As demonstrated by the accompanying vision document the Site can deliver sustainable high quality employment development meeting the following objectives:
- Provide opportunities for employment development at a strategic location;
  - Provide development in a sustainable location extending the existing Business Park;
  - Provide development in a location without detriment to the local landscape character or visual amenities of the rights of way network;
  - Create a cohesive Green Infrastructure centred on the framework of retained hedgerows and tree belts; and
  - Existing retained features to be supplemented with new habitats maximising opportunities for biodiversity and landscape enhancement.
- 8.11 RPS welcomes the proposed policy identifying Watling Street Business Park as an existing employment area to be safeguarded for employment uses. However, we suggest that the policy could be more positively prepared by being amended to make clear that the redevelopment of such sites for employment uses will be supported.
- 8.12 RPS is broadly supportive of the proposed policy for Employment and Skills Plans, but RPS recommend that the policy is redrafted to make clear that it will only be applied to the operational phase if the end occupier is known. This will avoid potential issues with speculative development. RPS also recommend that the policy is redrafted to allow for Employment and Skills Plans to be secured by way of a planning condition when appropriate as this is more proportionate than requiring a legal agreement, with the associated costs, in all circumstances.
- 8.13 Finally, additional work is being undertaken to address concerns expressed by officers with regards to the potential development of the Site. This will be provided to officers in due course.



**APPENDICES**



**Appendix A**

**Employment Land  
Technical Note**

# Employment Land Technical Note

## Introduction

1. RPS Consulting Services Ltd (RPS) are instructed by St. Modwen Logistics (St. Modwen) to represent their interests in the context of the preferred options consultation on the Cannock Chase Local Plan (the Plan) with regards to the Watling Street Business Park and adjacent land (collectively the Site) which is within their sole ownership.
2. This Employment Land Technical Note has been prepared to assess the employment land evidence prepared in support of the Plan. It forms part of the representations prepared by RPS on behalf of St. Modwen to the preferred options consultation on the Plan.

## Cannock Chase Economic Development Needs Assessment Update December 2020

3. The Cannock Chase Employment Development Needs Assessment December 2020 (EDNA) was prepared by Lichfields on behalf of Cannock Chase District Council (the Council). It updates the previous 2019 EDNA and includes the following sections:

### Updated Socio-Economic Context

4. This considers the impacts of the COVID-19 pandemic and Brexit based on available economic and demographic data available at the time of preparation. A SWOT analysis is provided. Given the uncertainty regarding the potential impacts of COVID-19 and Brexit, the forecasts in this section should be treated with significant caution.

### Overview of Employment Space

5. This provides an updated overview of the current stock of employment space in Cannock Chase District and summarises recent trends and changes in the supply of this employment space.

### Business Survey and Market Overview

6. This outlines the findings from an online Business Survey undertaken by Lichfields during October 2020. Given the low response rate the EDNA recognises that it is difficult to draw definitive conclusions regarding Cannock Chase's business needs from this. An updated overview of the commercial property market is also provided informed through consultation with local commercial property agents.

### Future Employment Land Requirements

7. This section considers a range of quantitative assessments of future economic growth needs in Cannock Chase District. A number of scenarios are provided including:



- Labour demand using Experian's Local Market Quarterly Forecasts for June 2020
  - Past jobs growth trended forwards
  - Regeneration led econometric model, factoring in economic aspirations contained in Strategic Economic Plans for Stoke and Staffordshire Local Economic Partnership, Greater Birmingham and Solihull Local Economic Partnership, and the West Midlands Combined Authority
  - Local labour supply forecasts based on the standard methodology for calculating housing need, plus potential contributions to meeting unmet housing need from the Black Country
  - Past trends in completions of employment space based on monitoring data
8. Commentary on the methodology for forecasting future employment land requirements is set out in the following section of this technical note.

## Approach to forecasting future employment land requirements

9. The approach taken to forecasting future employment land requirements is broadly consistent with the current version of the Planning Practice Guidance (PPG). Paragraph 027 (reference ID 2a-027-20190220) states:

*“Strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as:*

- *sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)*
- *demographically derived assessments of current and future local labour supply (labour supply techniques)*
- *analysis based on the past take-up of employment land and property and/or future property market requirements*
- *consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.*

*Authorities will need to take account of longer term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios.”*

10. The various potential scenarios presented in the EDNA meet the overall approach set out in the PPG by drawing upon a range of data using a variety of approaches to arrive at potential employment land requirements including both labour demand and labour supply based approaches as well as drawing upon past take up and some evidence of future market requirements.

11. However, while the broad approach is consistent with the PPG there are aspects of the PPG that based on the evidence available appear to have either only been met at a superficial level or have not been met at all.

### Evidence of market demand

12. With regards to evidence of market demand paragraph 026 of the PPG (reference ID: 2a-026-20190220) states that in gathering evidence to plan for business uses, strategic policy making authorities will need to liaise closely with the business community. In particular it states that they will need to assess:

*“evidence of market demand (including the **locational and premises requirements of particular types of business**) – sourced from local data and market intelligence, such as recent surveys of business needs, **discussions with developers** and property agents and engagement with business and economic forums” (emphasis added)*

### Locational and premises requirements of particular types of business

13. Little evidence is presented regarding locational and premises requirements of particular types of businesses in either EDNA. A location quotient assessment has been undertaken that indicates concentrations of particular industries. A review of Strategic Economic Plans has also been undertaken and the potential levels of growth predicted by these documents have been reviewed and adjusted based on the views of the Council’s Economic Development Officers as part of the process of preparing the regeneration based employment forecast. However, despite this useful data on the current local economy and identified opportunities for it to grow based on local strengths the EDNA fails to consider how this then relates to either locational requirements or premises requirements for different types of businesses.
14. Some limited commentary is provided in terms business size and broad requirements in terms of planning use class, but no consideration is given to what the requirements might be of different types of business, or how this might relate to the location and nature of employment land that is required to ensure that market demands are met. This means that the qualitative nature of employment land requirements within Cannock Chase District is not addressed.
15. Paragraph 029 of the PPG (reference ID: 2a-02920190220) specifically refers to the potential for a mismatch between quantitative and qualitative supply of and demand for employment sites. This clearly indicates that employment land requirements should not solely relate to the quantum of employment land required, but also the quality of such land.

### Discussions with developers

16. It is not clear from the evidence available what discussions have taken place with developers from either the 2018 or 2020 EDNA reports. While reference is made at paragraph 5.1 of the 2018 EDNA

to consultation with stakeholders including developers active within Cannock Chase and the wider market area, none of the commentary on the commercial property market in either assessment refers to any views expressed by developers. Instead comments are attributed solely to agents in both EDNA reports. Paragraph 4.24 of the 2020 EDNA notes that the updated commentary on the commercial property market is based on consultation with commercial agents.

17. Paragraph 6.253 of the Plan makes reference to consultation responses to the issues and options consultation, of which one comment is attributed to a site promoter. This is insufficient evidence of the proactive approach to engagement with developers envisaged by the PPG.
18. While the views of commercial agents are an important source of information on the commercial property market they are, as the PPG clearly sets out, not the only source. As a result of their different role in the market developers will hold different views to agents and this is rightly recognised by the PPG which advises strategic policy making authorities to engage with both agents and developers.
19. RPS recognise that the Council are engaging with developers based on our engagement with the Council, however this is not reflected in the evidence which needs updating to reflect the proactive approach that the Council are in practice undertaking.

### **Assessing need and allocating space for logistics**

20. Paragraph 031 of the PPG (reference ID: 2a-031-20190722) provides guidance in relation to assessing need and allocating space for logistics. With regards to the potential need for strategic facilities the guidance suggests that strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. While it is anticipated that the forthcoming West Midlands Strategic Employment Sites Study which has been commissioned by the Local Enterprise Partnerships and Staffordshire County Council will help to address the lack of evidence with regards to strategic logistics facilities there is little evidence in the 2020 EDNA that the Council is actively engaging with other relevant parties on this point.
21. Paragraph 031 of the PPG also notes that strategic policy-making authorities need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of 'last mile' facilities serving local markets. It notes that a range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability. There is no evidence that such an assessment has been undertaken.

## **Appendix B**

### **Ecology Solutions Response to Canal & River Trust Comments on Sustainability Appraisal**

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6903: WATLING STREET, CANNOCK

## **RESPONSE TO CANAL & RIVERS TRUST COMMENTS ON SUSTAINABILITY APPRAISAL**

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### Introduction

1. Ecology Solutions have been commissioned by St Modwen Ltd to review the Sustainability Appraisal Report produced in respect of the Preferred Options version of the Cannock Chase Local Plan (March 2021).
2. Specifically, Ecology Solutions have been asked to consider the assessment work undertaken in respect of the site known as Watling Street Business Park (CE20), (hereafter referred to as 'the site') noting that the score attributed to the site has been amended following consultation comments received from the Canal & Rivers Trust (CRT).
3. This note serves to consider and respond to the comments provided by the CRT. In summary, it is the view of Ecology Solutions that CRT comments provide a misleading interpretation of potential impacts. The altered double negative score (- - ?) attributed for the site under SAO1, as a response to these comments is inconsistent with scores attributed to other sites as part of the assessment process.

### Consideration of CRT Comments

4. In their response to the SA, the CRT state the site is located adjacent to the Cannock Extension Canal SSSI. However, the closest proposed built development at the site is located approximately 120m from the SSSI and SAC at its closest point.
5. Whilst St Modwen own land adjacent to the SSSI, this land would not form part of the development footprint associated with any emerging proposals at the site. To the contrary, this land would be retained as greenspace and indeed opportunities for ecological betterment could be delivered as an enhancement associated with emerging proposals.
6. It is noted that other sites considered as part of the SA, which have comparable separation distances from the SSSI, were not scored as having a potentially significant negative impact under this objective. Examples in this regard include

NE5: Turf Field, Watling Street, located 200m from the SSSI at its closest point and attributed a score of (- ?) under SA01.

7. Therefore, in order to ensure a consistent approach is applied within the SA, it would be appropriate for the score for Watling Street Business Park, under SA01, to be amended to (- ?).
8. It is noted that the CRT make reference to potential adverse impacts to the towpath associated with the Cannock Extension Canal. Noting these comments are not raised in relation to SA01, the concerns are not considered to relate to potential biodiversity impacts. Nonetheless and for completeness, use of the footpath would not have the potential to result in any adverse impacts on the SAC / SSSI. Indeed, it is relevant to note the potential for recreational impacts on this designated site have been scoped out in the Council's own HRA work (March 2021). In any event, there is no reason to consider that employment sites would generate any significant increase in use along the towpath.
9. As a broader observation, Ecology Solutions have concerns with the methodology adopted in respect of SA01. This objective is assessed purely on a proximity basis. Nonetheless, it is acknowledged in the SA methodology that:

*“while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment.”*

...

*“Once the HRA findings are available, [Sustainability Appraisal] scores will be adjusted if particular sites are identified as likely to have significant effects on one or more European designated nature conservation site”.*

10. Ecology Solutions concerns arise as subsequent HRA assessment work has only been undertaken on Preferred Options sites. As a result, there is no recourse for other sites (such as Watling Street Business Park) to have their true impact acknowledged, with the sites afforded an artificially low score as a result.
11. Indeed, a ‘shadow’ HRA, undertaken by Ecology Solutions in respect of emerging proposals for the site, concludes that potential impacts on the integrity of any European Sites (including their underpinning SSSI’s) would be avoided subject to the adoption of an appropriately designed scheme.
12. As such, it can reasonably be concluded that potential adverse impacts would be avoided on any biodiversity assets, indicating that emerging proposals would, at worst, attain a neutral score under SA01.

**Appendix C**

**Site Specific Green Belt  
Assessment**

# WATLING STREET - SITE SPECIFIC GREEN BELT ASSESSMENT

Prepared for St. Modwen Industrial & Logistics



JBB8263 - C7649  
Watling Street - Site Specific  
Green Belt Assessment  
2  
29 April 2021



## REPORT

### Quality Management

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## EXECUTIVE SUMMARY

RPS have undertaken this Site Specific Green Belt Assessment (the Assessment) to assess the level of harm that would be caused by the release of Watling Street Business Park and adjacent land (the Site) under the sole control of St. Modwen Logistics in support of representations made to the Cannock Chase Local Plan preferred options consultation.

In preparing the Assessment regard has been given to the Cannock Chase Green Belt Harm Assessment February 2021 (the 2021 LUC Assessment) prepared by Land Use Consultants Ltd on behalf of Cannock Chase District Council (the Council). In particular this Assessment follows the same methodology as the 2021 LUC Assessment to allow for comparison of its findings.

For the purposes of this Assessment the Site has been divided into two parcels, namely the Business Park Parcel and the Expansion Land Parcel, based on differences in the use and character of the two areas.

For the Business Park Parcel this Assessment finds that the level of harm associated with its release would be very low harm.

For the Expansion Land Parcel this Assessment finds that the level of harm associated with its release would be very low harm.

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# 1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd (RPS) are instructed by St. Modwen Logistics (St. Modwen) to represent their interests in the context of the preferred options consultation on the Cannock Chase Local Plan (the Plan) with regards to the Watling Street Business Park and adjacent land (collectively the Site) which is within their sole ownership.
- 1.2 This Site Specific Green Belt Assessment (the Assessment) has been prepared to assess the potential harm of releasing the Site from the Green Belt through the Plan for development for employment purposes. The Assessment forms part of the representations prepared by RPS on behalf of St. Modwen to the preferred options consultation on the Plan.
- 1.3 In preparing the Assessment regard has been given to the Cannock Chase Green Belt Harm Assessment February 2021 (the 2021 LUC Assessment) prepared by Land Use Consultants Ltd on behalf of Cannock Chase District Council (the Council). In particular this Assessment follows the same methodology as the 2021 LUC Assessment to allow for comparison of its findings.
- 1.4 The 2021 LUC Assessment did not assess the Site in isolation, but instead included it within a much larger area OA14. However, an earlier assessment also prepared by LUC in 2016, the Cannock Chase Green Belt Study (the 2016 LUC Assessment), did assess the undeveloped part of the Site in detail as part of a wider parcel. While the 2016 LUC Assessment followed a different methodology to the 2021 LUC Assessment the approach taken to the assessment of how sites performed with regards to their contribution to the five purposes of the Green Belt is comparable. As such we have drawn upon the findings of the 2016 LUC Assessment where appropriate to inform the Assessment of the Site.
- 1.5 This Assessment is structured in the following manner:
- Overview of the Site;
  - Approach to Green Belt Assessment;
  - Findings of the Site Specific Green Belt Assessment; and
  - Conclusions.

## 2 OVERVIEW OF THE SITE

### Location

- 2.1 The Site covers around 11.55 ha of land and lies to the south of Watling Street (A5), to the south east of Cannock and to the south west of the town of Brownhills West. It consists of the 6.1 ha Business Park and 5.45 ha expansion land to the south and west. We have subdivided the Site into these two areas for the purposes of the Assessment.
- 2.2 The Site lies to the south of the Cannock Chase District within Southern Staffordshire. It is conveniently located off the strategic highways network, directly to the south of the A5 Watling Street and in close proximity to the M6 (Toll).
- 2.3 Within the surrounding area Brownhills is situated 0.4km away to the east, whilst Norton Canes lies 0.5km away to the north. Other settlements nearby include Great Wyrley and Cannock (approximately 2.5km to the west) whilst Pelsall lies 2km to the south. A range of commercial and industrial estate developments are present within the surrounding area by the outskirts of existing settlements.
- 2.4 Cannock Extension Canal lies in close proximity to the west of the Site. Norton Canes Moorings, an existing business, is situated to the west of the Canal at North Lanes.
- 2.5 As well as the existing Business Park on Watling Street, other developments nearby include and Esso Garage adjacent to the north western boundary of the Site, Moss Farm/Farm Shop and the public house by the Watling Street/Walsall Road roundabout.
- 2.6 The Site is visually well screened from all of the existing settlements in the local area. Established tree belts are present along the entire perimeter of the Site and there are substantial woodlands present through the surrounding landscape.
- 2.7 **Figure 2.1** shows the Site boundary edged in red. **Figure 2.2** shows the Site context.

Figure 2.1: Site Location

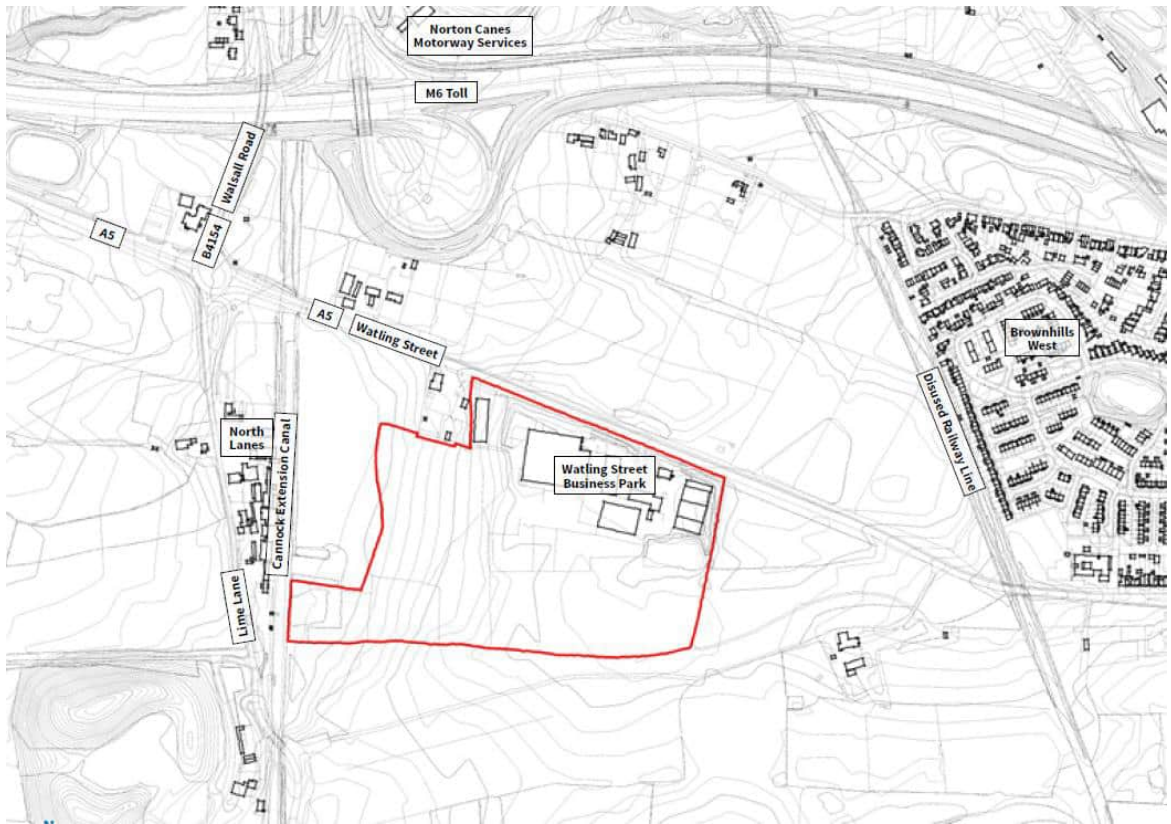
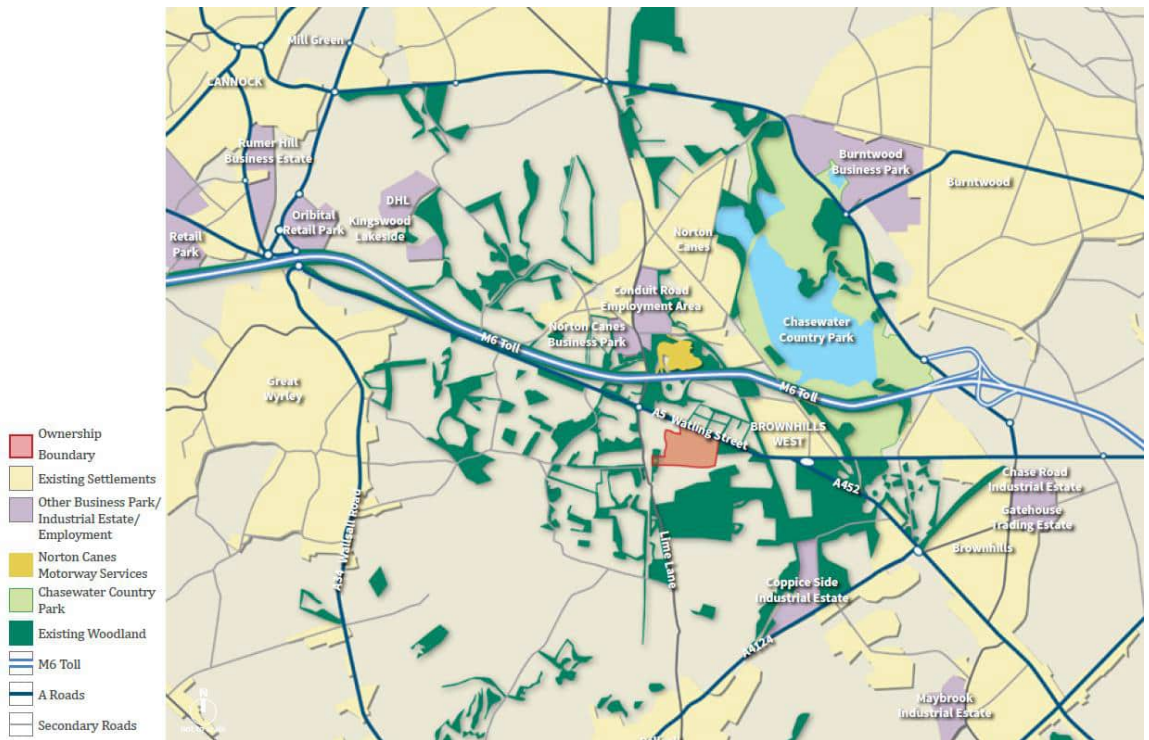


Figure 2.2: Site Context



## Site Description

- 2.8 The whole Site is owned by St Modwen including the existing Watling Street Business Park along with expansion land situated immediately to the south and west of the Business Park.
- 2.9 The Business Park (6.1Ha) currently provides over 150,000 square feet (13,935m<sup>2</sup>) of warehousing, offices and open storage, accommodating a range occupiers and uses including furniture making, bicycle repair shop, vehicle electronics/repair, lease vehicle repair/ maintenance, caravan/motorhome showroom, medical gases/equipment supplier, and a recycling facility for IT equipment. An open storage facility is currently located within the southern part of the existing Business Park.
- 2.10 The main entrance and access into the Site is off the A5 Watling Street with an internal circulation road serving particular units/buildings.
- 2.11 Established tree belts/hedgerows are present along the perimeter of the Business Park, and around the pond located at the south eastern corner of the Business Park. Consequently, the existing buildings are well screened from the surrounding area.
- 2.12 The expansion land (5.45Ha) adjoining the Business Park comprises of 5 fields currently in agricultural use, the majority of which are in arable use with the exception of woodland located by the Cannock Extension Canal. The field boundaries are very well defined by an established framework of hedgerows and tree belts, and generally intact aside from small gaps for agricultural accesses. **Figure 2.3** shows the relationship between the two parcels.

**Figure 2.3: Site Parcels**

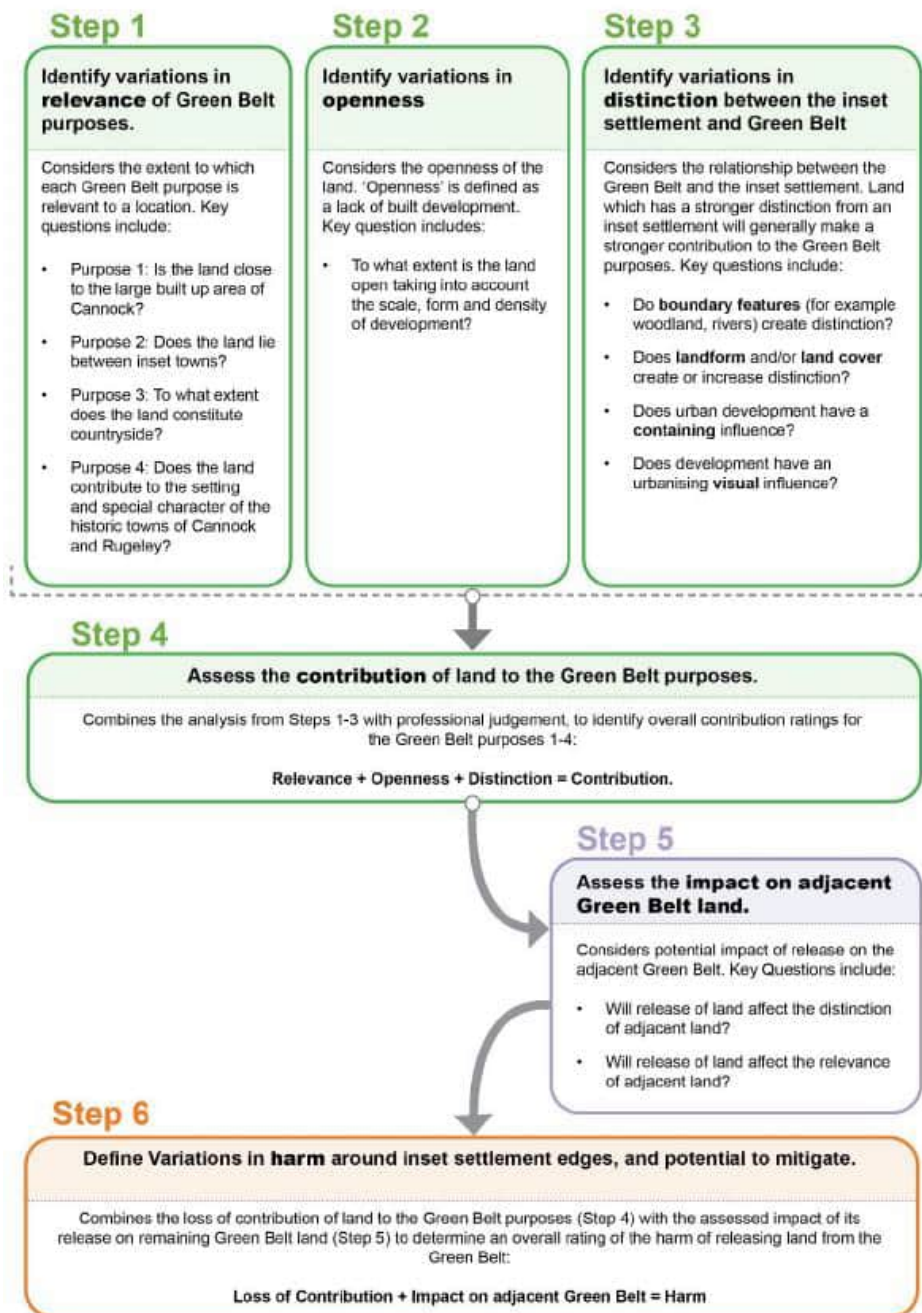


### 3 APPROACH TO GREEN BELT ASSESSMENT

#### Methodology

3.1 The methodology of this Assessment follows the same methodology as the 2021 LUC Assessment which was prepared for the Council to allow for comparison of the results. **Figure 3.1** below which has been taken from the 2021 LUC Assessment summarises the overall approach to assessment.

**Figure 3.1: Green Belt Assessment Methodology**

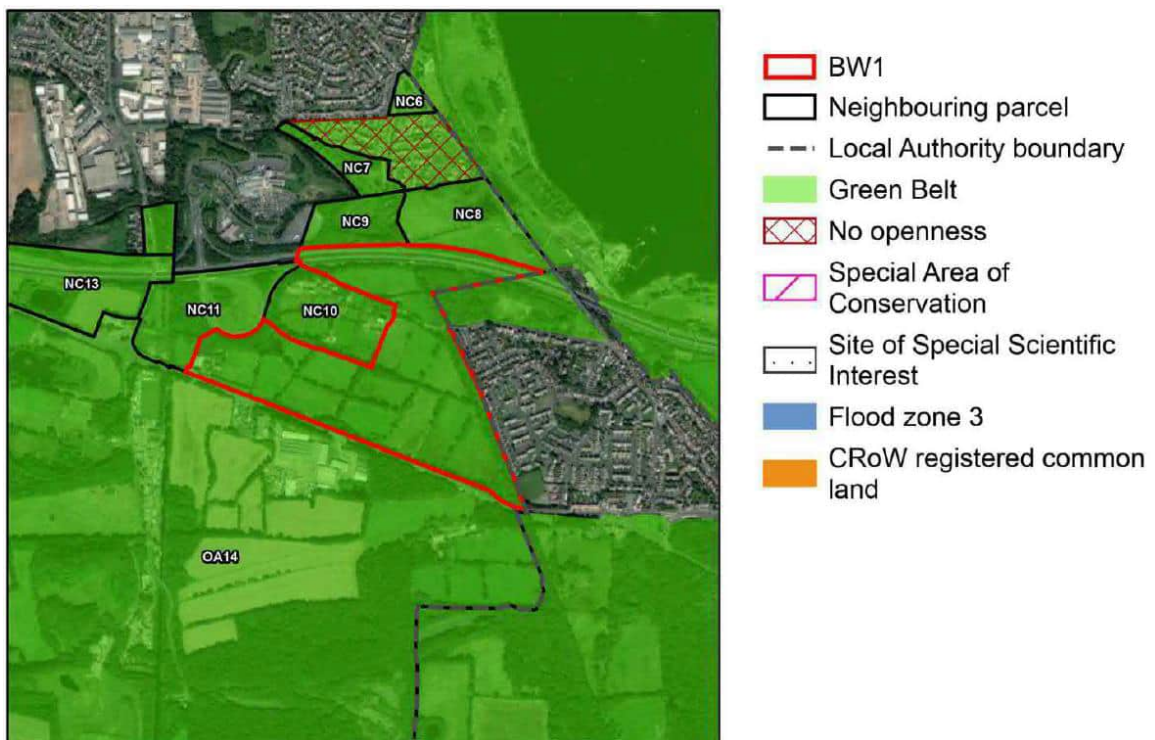




## Distinction

- 3.2 RPS do not agree with LUC’s position with regards to defining the Site as part of an outer area. Paragraph 3.10 of the 2021 LUC Assessment states that the process for identifying parcels for assessment was undertaken by working out from each inset settlement edge until strong distinction was identified. Beyond these parcels, outer areas were defined, which were subject to a high level contribution assessment.
- 3.3 Paragraph 3.69 of the 2021 LUC Assessment states that four interrelated elements were considered to assess distinction between land within the Green Belt and developed land. These are:
- Boundary features.
  - Landform and land cover;
  - Urbanising visual influence; and
  - Urban containment;
- 3.4 Consideration of these elements was combined, using professional judgement, to give a rating on a 4-point scale (weak, moderate, strong and very strong distinction).
- 3.5 Parcel BW1 which lies to the north of Watling Street Business Park on the opposite side of the A5 is shown on **Figure 3.2** below which is taken from the 2021 LUC Assessment:

**Figure 3.2: Parcel BW1**



- 3.6 With regards to distinction of parcel BW1 Appendix B Brownhills West states:

*“The parcel has some limited containment by washed-over inset development to the north and south, and landform and land cover within the parcel do not create distinction from Brownhills West. However, the thick tree line to the east is a strong boundary feature creating separation from the settlement, and the parcel extends a reasonable distance from the inset area. A strong hedgerow structure within the parcel means that views are dominated by open countryside. Therefore, there is strong distinction between the parcel and the urban area.”*

- 3.7 RPS disagree that the features identified amount to a strong distinction from the urban area. In particular we note that linear tree cover is given as an example of a moderate boundary feature on page 53 of the 2021 LUC Assessment. We also note that washed-over development to the north and the south of the parcel contribute to containment which reduces distinction as per paragraph 3.78 of the assessment. In relation to views paragraph 3.76 of the 2021 LUC Assessment states that caution should be used when considering views, on the basis that seasonal variations and boundary maintenance regimes can have a significant impact. Given this we question the degree to which the hedgerow structure within the parcel prevents views of the urban area and washed over development during the winter.
- 3.8 Given the points above RPS consider that parcel BW1 to only be of moderate distinction between the parcel and urban area. Accordingly, parcels beyond this including the Site should not be considered as outer areas and should be subject to more detailed site specific assessment than was undertaken as part of the 2021 LUC Green Belt Assessment.

## **Inspector’s Letter to Welwyn Hatfield Borough Council December 2017**

- 3.9 RPS note that the 2021 LUC Assessment refers to the Inspector’s Letter to Welwyn Hatfield Borough Council (December 2017). In this letter the Inspector highlights a number of failings with the approach taken to Green Belt review on the preparation of the Welwyn Hatfield Local Plan. The following quotes are particularly relevant to the approach undertaken by the 2021 LUC Assessment:
- “The phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. It goes without saying that a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt. Such an approach is also more likely to reveal opportunities as well as localised constraints, both of which might reasonably be considered further.” (fourth paragraph, **emphasis added**)*

- 3.10 RPS contend that this criticism can be applied to the assessment of the outer area parcels identified in the LUC 2021 Assessment. Particularly in the case of the Site, where the presence of the existing Watling Street Business Park, Esso Garage, and North Lanes provide significant urban containment.
- 3.11 The Inspector's Letter to Welwyn Hatfield Borough Council (December 2017) goes on to state:  
*"Additionally, the phase 2 Green Belt Review, which did look at a finer grain of sites, does not appear to have examined all of the potential development sites **adjacent to the urban areas.**" (paragraph 5, **emphasis added**)*
- 3.12 RPS note that LUC appear to have interpreted the above to mean immediately adjacent to inset areas. There are two issues with this, firstly the Inspector does not refer to inset areas, but to urban areas which should include urban areas currently washed over by the Green Belt such as Watling Street Business Park. If assessments are only to consider potential development sites adjacent to inset areas then they fail to consider urban areas currently washed over by the Green Belt, such as Watling Street Business Park, despite such areas making little or no contribution to the purposes of the Green Belt due to their existing urban nature.
- 3.13 Secondly, LUC appear have interpreted this as meaning immediately adjacent when considering distinction. This would mean that only development parcels which have no separation from urban areas would be assessed. This would exclude parcels separated from urban areas by any features such as woodland, rivers, roads etc. which would be contrary to established practice.
- 3.14 It is noted that paragraph 3.93 of the 2021 LUC Assessment defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land / parcels being assessed for potential release. This is contradictory to the approach taken to distinction wherein the 2021 LUC Assessment has used the presence of a parcel that they have assessed as being strongly distinct to mean that all parcels beyond this should not be assessed at more than a high level as an outer area. Parcels such as the Site can still be in close proximity to the urban areas while not being immediately next to said urban areas.
- 3.15 As such RPS consider that the approach taken by LUC in the 2021 LUC Assessment does not reflect the approach advocated by the Inspector's Letter to Welwyn Hatfield Borough Council (December 2017). RPS contend that to be in accordance with this approach the approach to assessment should consider all potential development sites adjacent to urban areas, such as the Site.

## 4 SITE SPECIFIC GREEN BELT ASSESSMENT OF WATLING STREET BUSINESS PARK

### Parcels to be assessed

4.1 While RPS consider that there is merit in assessing both the business park and expansion land as one parcel, we note that this would not be consistent with the approach taken in the 2021 LUC Assessment and so have subdivided the Site into these two parcels as shown on **Figures 4.1** and **4.2** below:

**Figure 4.1: Business Park Parcel**



**Figure 4.2: Expansion Land Parcel**



4.2 Neither of these parcels are covered by an ‘absolute’ constraint to development, which are defined by paragraph 3.14 of the 2021 LUC Assessment as follows:

- Special Areas of Conservation;
- Sites of Special Scientific Interest;
- Ancient Woodland;
- Scheduled Ancient Monuments;
- Registered Parks and Gardens;
- Common Land;
- Cemeteries; and
- Flood Zone 3.

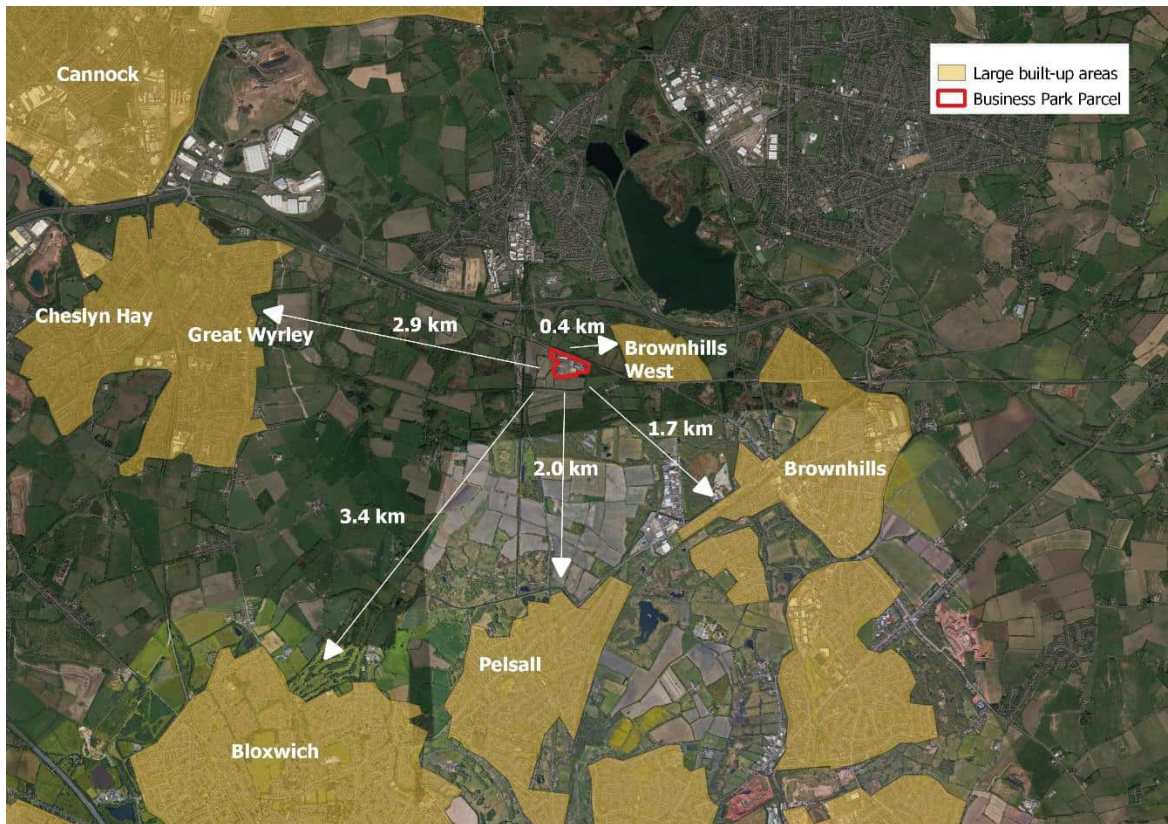
## Green Belt Assessment of Business Park Parcel

### Step 1: Consider the 'relevance' of each Green Belt purpose

#### Does the land have the potential to play a role with regard to Purpose 1: to check the unrestricted sprawl of large built-up areas?

- 4.3 On page 28 the 2021 LUC Green Belt Assessment defines the large built-up area as the main urban conurbation of Birmingham and associated towns and urban area of Cannock, Cheslyn Hay, Great Wyrley and Hednesford. Paragraph 3.33 notes that settlements deemed close enough to the 'core' urban area for development associated with them to be considered to be part of the large built-up area includes the town of Brownhills West.
- 4.4 It is noted that the previous 2016 LUC Assessment included a much broader definition of the large built-up area including ribbon development associated with all inset areas and industrial estates, business parks and gypsy and traveller sites. As stated at paragraph 3.34 of the 2021 LUC Assessment the definition of the large built-up area was tightened to focus on the major urban areas and to be consistent with the neighbouring Green Belt Studies covering the Black Country, South Staffordshire and Lichfield.
- 4.5 As set out on page 30 of the 2021 LUC Assessment Green Belt land does not play a role with regards to Purpose 1 if it is not close enough to the large built-up area to be associated with it. This is the case for the Business Park Parcel as shown on **Figure 4.3** below:

**Figure 4.3: Purpose 1 Business Park Parcel**



4.6 RPS also note that the land is not open and so cannot contribute to Purposes of the Green Belt as per the assessment criteria set out on page 61 of the 2021 LUC Green Belt Assessment.

**Does the land have the potential to play a role with regard to Purpose 2: to prevent neighbouring towns merging into one another?**

4.7 Paragraphs 3.38 and 3.39 of the 2021 LUC Assessment defines Purpose 2 towns as:

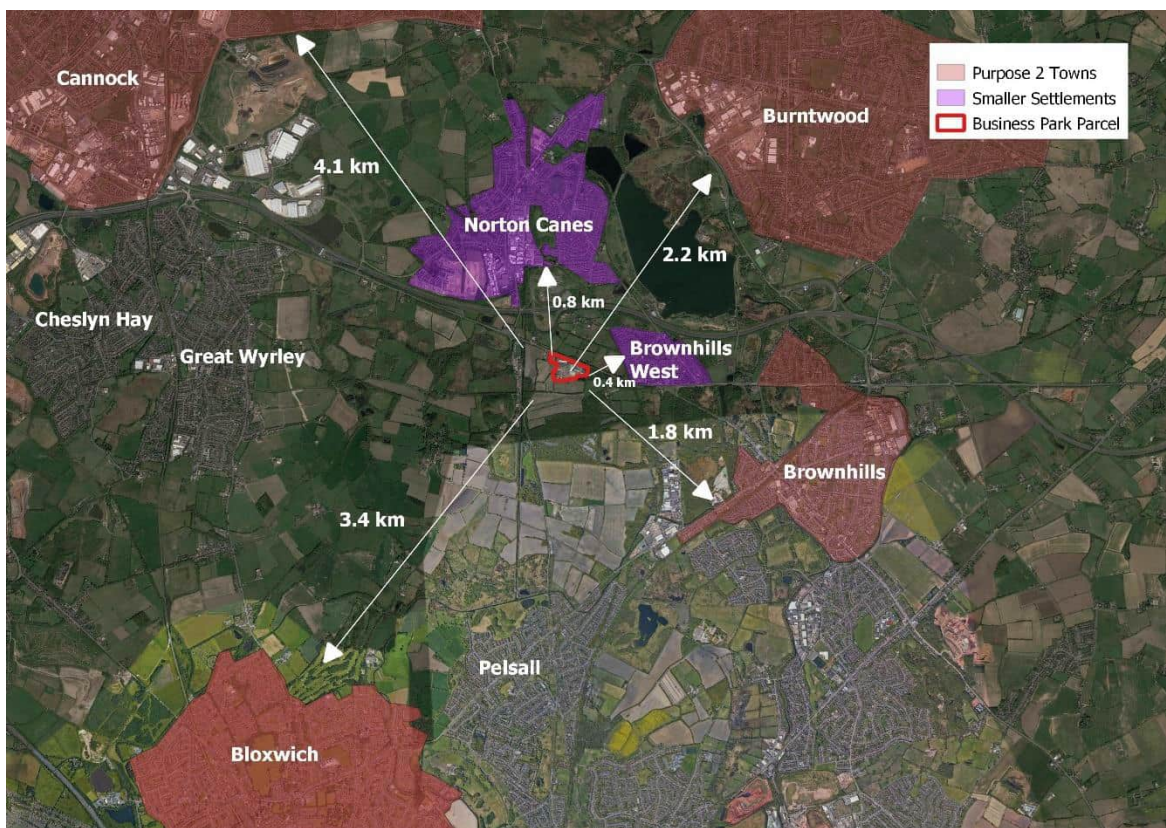
- The main urban area, grouped around Cannock, Hednesford and Heath Hayes;
- Rugeley;
- Burntwood;
- Brownhills; and
- Bloxwich.

4.8 Paragraph 3.40 of the 2021 LUC Assessment states that:

*“Regardless of whether a particular settlement is large enough to realistically be considered a town, it is acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’. This was taken into account in the study.”*

- 4.9 As such while neither Brownhills West or Norton Cranes are identified as a Purpose 2 town, RPS has considered as part of this assessment the relationship of the Site with these towns.
- 4.10 Pages 33 and 34 of the 2021 LUC Assessment state that Green Belt land has less potential to play a role with regards to Purpose 2 - i.e. gap is robust – if there is a wide gap between towns. Urbanising development reduces gaps but there are some significant separating features. This is the case for the Business Park Parcel if it is considered to be located within the wide gaps between Burntwood and Bloxwich, and Cannock and Brownhills. The Business Park Parcel is not located within the gap between Brownhills West and Norton Cranes. These points are illustrated by **Figure 4.4** below:

**Figure 4.4: Purpose 2 Business Park Parcel**



- 4.11 However, RPS note that as per the criteria on page 63 of the 2021 LUC Assessment the Business Park parcel is not open and so cannot contribute to the purposes of the Green Belt.

**Does the land have the potential to play a role with regard to Purpose 3: to assist in safeguarding the countryside from encroachment?**

- 4.12 As set out at paragraph 3.46 of the 2021 LUC Assessment this considers the extent to which land can be considered to constitute ‘countryside’ on the basis of it’s usage. It does not consider the impact of development which can be considered to reduce openness (in Green Belt terms), or of

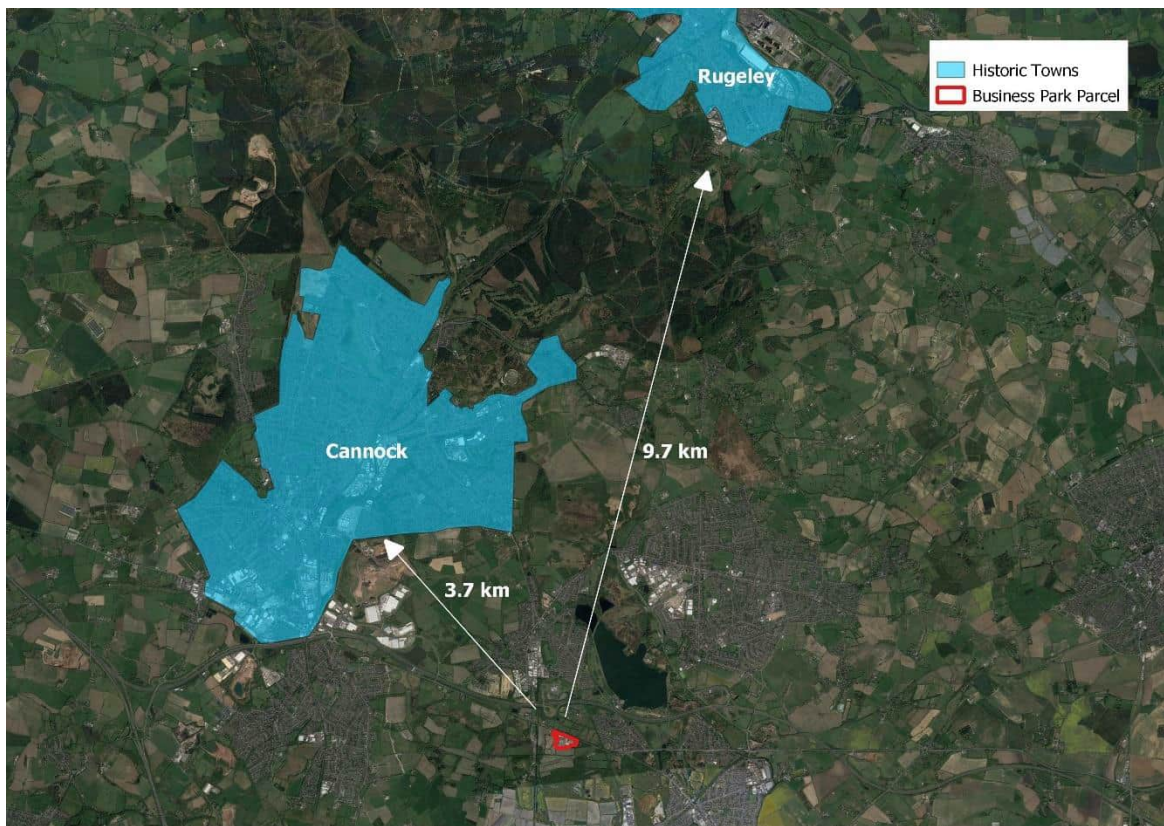


development which has a containing urbanising influence, as these are addressed in the analysis at Step 2 and Step 3 respectively.

- 4.13 Paragraph 3.47 of the 2021 LUC Assessment goes on to state that Land may through its usage have a stronger relationship with the adjacent built up area and, as a result, not be considered 'countryside' to the same degree as other open land, but it is important not to stray from assessing the Green Belt purposes into assessing landscape character, sensitivity or value. Whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not taken into consideration: the poor condition of Green Belt land does not necessarily undermine its fundamental role of preventing urban sprawl by keeping land permanently open.
- 4.14 As set out on page 65 of the 2021 LUC Assessment the Business Park Parcel is not open as it is entirely urban in character and so it cannot contribute to the purposes of the Green Belt.

**Does the land have the potential to play a role with regard to Purpose 4: to preserve the setting and special character of historic towns?**

- 4.15 Paragraph 3.52 of the 2021 LUC Assessment states that it concluded that land around two settlements within Cannock Chase District – Cannock and Rugeley – should be considered for potential contribution to Purpose 4. The Site, and for the purposes of this assessment the Business Park Parcel, does not lie within these areas and so does not make a contribution towards Purpose 4 as shown on **Figure 4.5** below:

**Figure 4.5: Purpose 4 Historic Towns**

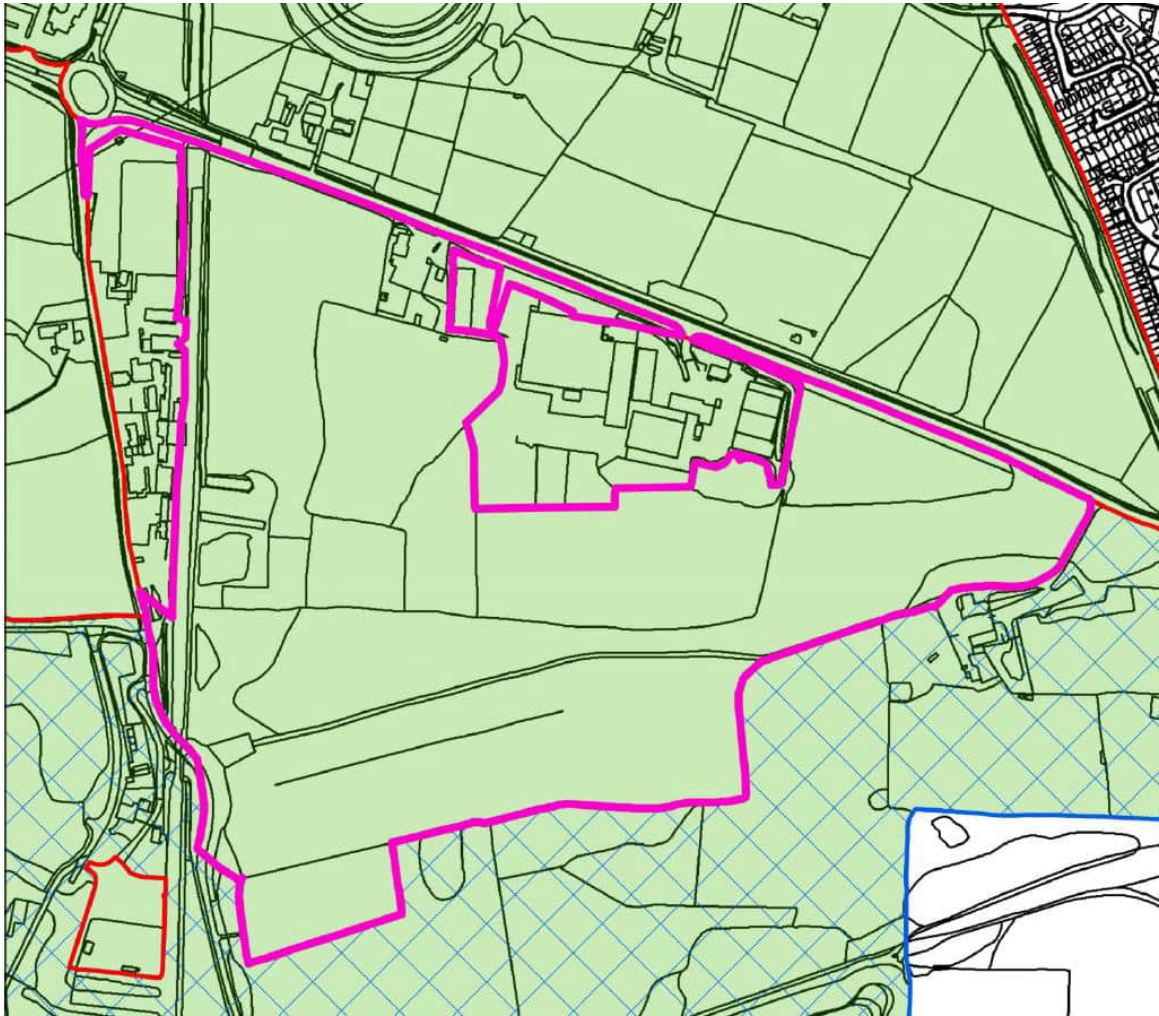
**Does the land have the potential to play a role with regard to Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?**

- 4.16 Paragraph 3.57 of the 2021 LUC Green Belt Assessment notes that due to the nature of the settlement pattern within Cannock, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. As such the 2021 LUC Assessment assumes an even level of contribution to Purpose 5 for all areas of Green Belt based on the average availability of brownfield land across the District. On this basis all parcels of Green Belt land within the District, including the Business Park Parcel is considered to make a Strong contribution to Purpose 5.
- 4.17 While RPS recognise the general position that all land in the Green Belt contributes towards this purpose, we note that this is the case for undeveloped land. On previously developed land within the Green Belt redevelopment is considered to be appropriate development subject to not having a greater impact upon openness of the existing Green Belt as per paragraph 145 g) of the NPPF 2019 is capable of development. As such previously developed land makes a weaker contribution to encouraging the recycling of derelict and other urban land as it is capable of development, albeit the level of development that such land is capable of accommodating, and therefore it's contribution to

Purpose 5 will vary depending on the degree to which it can be considered open. Given that the Business Park Parcel is developed the only impact that its redevelopment would have on openness is that of surrounding land as it is not in itself open. Therefore RPS consider that the Business Park Parcel only makes a weak contribution to this purpose.

## Step 2: Identify variations in Green Belt openness

- 4.18 At paragraph 3.60 the 2021 LUC Assessment notes that the NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. Accordingly it notes that the presence of 'urbanising development' within the Green Belt can diminish the contribution of land to the Green Belt purposes.
- 4.19 Paragraph 3.61 of the 2021 LUC Assessment states that Green Belt openness relates to a lack of 'inappropriate built development' rather than visual openness; thus both undeveloped land which screened from view by landscape elements (e.g. tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms. Accordingly the 2021 LUC Assessment of openness first considers the appropriateness of development. Where development is not 'appropriate', it considers the extent, scale, form and density of development, in order to make a judgement on the degree of openness.
- 4.20 Paragraph 3.63 goes on to state that at a very localised scale, any inappropriate development can be considered to diminish openness, but small areas of isolated development have negligible impact in this respect, and are not therefore defined and assessed as separate parcels of land. Any larger areas of Green Belt land which are judged to be developed to an extent that they lack the 'essential characteristic' of openness are considered to make no contribution to Green Belt purposes. It states that these are defined and mapped.
- 4.21 Paragraph 3.64 of the 2021 LUC Assessment states that the locations defined as outer areas of the Green Belt by the 2021 were not assessed with regards to openness and were assumed to be open, as the assessment of these areas was high level and strategic. Given this the 2021 LUC Assessment has not made a judgement as to whether or not the Business Park Parcel is a larger parcel that lacks the 'essential characteristic' of openness as areas of this type within the outer areas have not been assessed. However the 2016 LUC Assessment excluded the Business Park Parcel from the assessment of the parcel that contains the Site as shown on **Figure 4.6** below:

**Figure 4.6: 2016 LUC Assessment Parcel**

- 4.22 On this basis RPS assume that LUC concluded in 2016 that the Business Park Parcel lacked the 'essential characteristic' of openness due to the presence of the Business Park which is 'inappropriate development' in the Green Belt and was of the scale that meant it makes no contribution to Green Belt purposes. RPS consider this to still be the case and so have undertaken this assessment on the same basis. It should also be noted that the Preferred Options Sustainability Appraisal, and earlier versions of the Sustainability Appraisal, have subdivided the Site on the same basis.
- 4.23 Should it be subsequently considered that the Business Park Parcel is not large enough to merit the subdivision of the Site on this basis RPS recommend that an updated Green Belt Assessment and Sustainability Appraisal is undertaken of the Site in its entirety.

## Step 3: Identify variations in the distinction between urban areas and the Green Belt

- 4.24 Paragraph 3.65 of the 2021 LUC Assessment states that Having considered in general terms the variations in the relevance of each of the Green Belt purposes, the next step in the assessment process identifies more localised variations in the relationship between Green Belt land and urban development – i.e. whether the land seems like it is part of the urban area or the countryside.
- 4.25 Paragraph 3.66 of the 2021 LUC Assessment goes on to state that land that is more strongly related to urbanising development typically makes a weaker contribution to all of the first three Green Belt purposes, being less likely to be perceived: as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2), or encroaching on the countryside (Purpose 3). While paragraph 3.67 notes of the 2021 LUC Assessment notes that for Purpose 4 there is no separate consideration of distinction, because contrary to Purposes 1 to 3, land which has a strong relationship with the town is likely to make a greater rather than lesser contribution.
- 4.26 Paragraph 3.68 of the 2021 LUC Assessment sets out that the process of assessing distinction was carried out on a settlement by settlement basis, for each inset urban area. The analysis was applied as a progression out from each settlement edge, recognising that with distance from that settlement the level of distinction will only increase, not diminish. Notwithstanding our criticisms of the findings of the 2021 LUC Assessment for the adjacent parcel BW1, RPS agree in general with this approach.
- 4.27 Paragraph 3.69 of the 2021 LUC Assessment states that four interrelated elements were considered to assess distinction between land within the Green Belt and developed land. These are:
- Boundary features.
  - Landform and land cover;
  - Urbanising visual influence; and
  - Urban containment;
- 4.28 Consideration of these elements was combined, using professional judgement, to give a rating on a 4-point scale (weak, moderate, strong and very strong distinction).

### Boundary features

- 4.29 Paragraph 3.72 of the 2021 LUC Assessment states that for land adjacent to an urban area the analysis only considered the urban boundary, but progressing further from the urban area, the cumulative impact of multiple boundary features increases distinction.
- 4.30 The Business Park Parcel is primarily contained by mature well treed hedgerow defined on page 53 of the 2021 LUC Assessment as being a moderate boundary, apart from along part of its northern edge when it is accessed from the A5. Page 53 of the 2021 LUC Assessment notes that main roads

are also an example of a moderate boundary. As such the Site is contained by moderate boundary features.

### **Landform and land cover**

- 4.31 Paragraph 3.74 of the 2021 LUC Assessment notes that as well as landform and land cover serving as boundary features that this may extend into a broader feature which creates greater distinction. Examples are given of a woodland, lake or valley. These types of features do not apply to the Business Park Parcel.

### **Visual openness**

- 4.32 Paragraph 3.75 of the 2021 LUC Assessment notes that this is not concerned with the scenic quality of views, but the extent to which an absence of visual association with the open Green Belt countryside or, conversely, the extent to which the visual dominance of urban development may increase association with the urban area.
- 4.33 The business park is urban in character and therefore has no visual association with the open Green Belt countryside.

### **Urban containment**

- 4.34 This relates to whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area. This does not apply to the business park as it is already entirely urban in character.

### **Distinction of the Site**

- 4.35 The Business Park Parcel has moderate boundary features with surrounding areas. The Business Park Parcel does not contain landforms or land cover that contribute to distinction. The business park has no visual association with the open Green Belt countryside. On the basis of the boundary features and given the urban nature of the Business Park Parcel we consider that the overall level of distinction is only weak.

## **Step 4: Assess the contribution of land to the Green Belt Purposes and define parcels**

- 4.36 As set out at paragraph 3.81 of the 2021 LUC Assessment this step considers the analysis in each of the previous steps to identify overall contribution rating for each Green Belt purpose. Each area of variation in contribution to one or more of the purposes was defined as a parcel, with contribution ratings and supporting analysis.

- 4.37 For Green Belt Purposes 1, 2 and 3 the relevance (Step 1), openness (Step 2) and distinction (Step 3) are considered to arrive at a judgement on the relative contribution of different areas of land as described at paragraph 3.82 of the LUC 2021 Assessment. The same paragraph goes on to explain that contribution to the Green Belt purposes was rated on a 5-point scale (strong, relatively strong, moderate, relatively weak and weak/no contribution, in accordance with criteria lists on pages 59 to 67 of the 2021 LUC Assessment. It also notes that these criteria lists indicate typical combinations of relevance, openness and distinction, but professional judgement may result in the addition of particular weight to one of these elements.
- 4.38 For Purpose 4 paragraph 3.83 of the 2021 LUC Assessment explains that in accordance with advice from Historic England, judgements were based on specific analysis of the historic town in question, and its relationship with its Green Belt surroundings as set out in the criteria list for Purpose 4.
- 4.39 Paragraph 3.84 of the 2021 LUC Assessment notes that standard text is used to indicate that contribution to Purpose 5 is consistent across all of the study area.
- 4.40 For Purpose 1 paragraph 3.85 of the 2021 LUC Assessment notes that adjacent to settlements the assumption was made that the purpose will remain relevant at least until the level of distinction between the large built-up area and open land reaches a strong level. Beyond this the relevance, and therefore the contribution, will diminish.
- 4.41 Paragraph 3.86 of the 2021 LUC Assessment notes that in between settlements where Purpose 2 is relevant, contribution will likewise reduce at the periphery of the gap. Unlike Purposes 1 and 2, contribution to Purpose 3 will not diminish with distance from urban areas and will consequently be high for all land beyond those areas that do not have strong distinction from an urban area.

### **Contribution of the Business Park Parcel to the Green Belt Purposes**

- 4.42 RPS consider that the Business Park consists of an area with a variation in contribution to one or more of the purposes and so should be defined as a parcel. Set out below is our assessment of the contribution of this parcel to each purpose in accordance with the criteria set out on page 59 to 67 of the LUC 2021 Assessment.

#### **Purpose 1**

- 4.43 The Business Park Parcel is not open and so makes no contribution to Purpose 1.

#### **Purpose 2**

- 4.44 The Business Park Parcel is not open and so makes no contribution to Purpose 2.

#### **Purpose 3**

- 4.45 The Business Park Parcel is not open and so makes no contribution to Purpose 3.

#### **Purpose 4**

- 4.46 The Business Park Parcel does not contribute to the historic setting or special character of either Cannock or Rugeley and so makes no contribution to Purpose 4.

#### **Purpose 5**

- 4.47 Paragraph 3.89 of the 2021 LUC Assessment states that all Green Belt land is considered to make strong contribution to Purpose 5. However, RPS consider that as previously developed land the Business Park Parcel is capable of some development under paragraph 145 g) of the NPPF 2019 it must make a weaker contribution to Purpose 5 than undeveloped open Green Belt Land

#### **Loss of contribution**

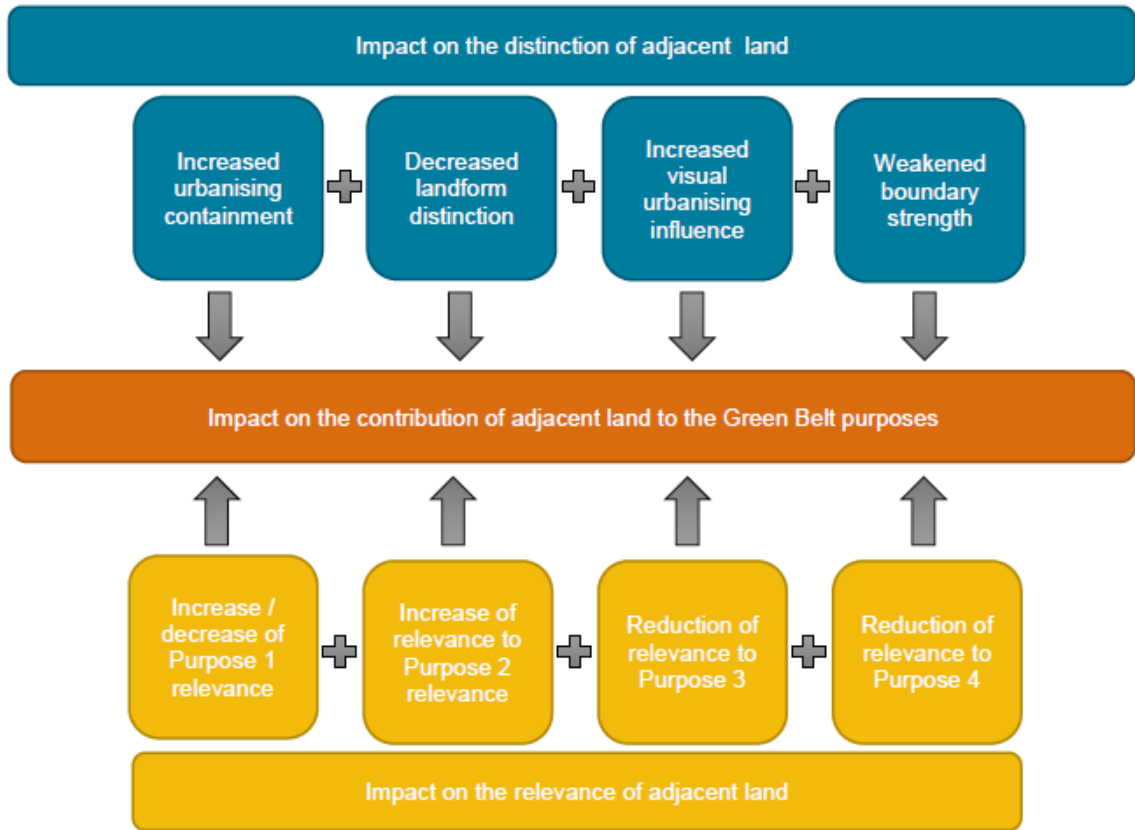
- 4.48 As set out at paragraph 3.90 of the 2021 LUC Assessment the loss of contribution to the Green Belt purposes as a result of the release of a parcel of land equates to the contribution ratings assessed for that parcel.
- 4.49 Paragraph 3.91 of the 2021 LUC Assessment notes that in cases where release of a parcel would also, in order to form an expansion of the inset settlement, necessitate the release of intervening land, the loss of contribution is that associated with the highest contributing parcel. This does not apply to the Business Park Parcel.

#### **Step 5: Assess additional impact of release on adjacent Green Belt**

- 4.50 As noted earlier, paragraph 3.93 of the 2021 LUC Assessment defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land / parcels being assessed for potential release.
- 4.51 Paragraph 3.94 goes on to state that the assessment of the additional impact of the release of land on adjacent Green Belt land considered two factors: the impact on the distinction (from inset areas) of the adjacent land and the impact on the relevance of the adjacent land to the NPPF purposes. The third factor, openness, is not relevant to the assessment of impact on adjacent land as it is assumed that adjacent land will remain open. **Figure 4.7** below which is Figure 3.3 in the 2021 LUC Assessment illustrates the elements to be considered when assessing the impact of the release on adjacent Green Belt land.
- 4.52 It should be noted that this approach is unusual and not consistent with RPS's substantial experience of undertaking and reviewing Green Belt Assessments elsewhere, however to ensure constituency and aid in allowing the findings of this assessment to be compared with the 2021 LUC Assessment we have followed the same methodology.



**Figure 4.7: Variations in impact on release of adjacent land**



**Impact on distinction**

4.53 The release of the Business Park Parcel would not cause any of the identified impacts and so would not weaken the distinction of adjacent Green Belt land. Therefore, it will not affect the contribution of adjacent land to Green Belt Purposes and so the harm of the release of the Business Park Parcel would not increase on this basis.

**Impact on relevance**

4.54 The release of the Business Park Parcel would not lead to adjacent land becoming close enough to the inset edges of the large built-up area or lead to adjacent retained Green Belt land becoming perceived as being within the large built-up area. Hence, its release would not affect any adjacent land with regards to its relevance for Purpose 1 as explained at paragraph 3.99 of the 2021 LUC Assessment. It would also not lead to any substantial change in the settlement gap and so would not change the relevance of Purpose 2 for adjacent parcels of land as set out at paragraph 3.100 of the 2021 LUC Assessment.

- 4.55 Paragraph 3.101 notes that the relevance of adjacent retained Green Belt land to purpose 3 would rarely be affected. Its release would not result in adjacent land becoming contained to the extent that it is too isolated from the wider Green Belt to be considered part of the countryside.
- 4.56 Adjacent Green Belt land does not make a contribution to Purpose 4 and so the release of the Business Park parcel would not harm the relevance of adjacent parcels of Green Belt in keeping with the approach set out in paragraph 3.102 of the 2021 LUC Assessment.

### Impact on adjacent land

- 4.57 Overall the release of the Business Park Parcel would only have a negligible impact on adjacent Green Belt land as it would not impact the distinction of adjacent Green Belt land or relevance of this land to Green Belt purposes as per the guidance notes and examples set out on pages 73 to 76 of the 2021 LUC Assessment.

## Step 6: Define variations in harm to the Green Belt around the inset edge

### Assessment of harm

- 4.58 RPS notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm at the level of moderate – low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower.
- 4.59 RPS consider the Business Park Parcel to make no contributions to Purposes 1 to 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment.
- 4.60 As noted above RPS consider the Business Park Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm, then this would still result in an overall assessment of very low harm.
- 4.61 If it is considered that the Business Park Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the release of the Business Park Parcel would result in moderate harm.
- 4.62 **Table 4.1** below provides a summary of our assessment:

**Table 4.1: Summary of findings for Business Park Parcel**

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Brownhills West	Release of Business Park Parcel	6.1	No	No	No	No	Weak	Very Low

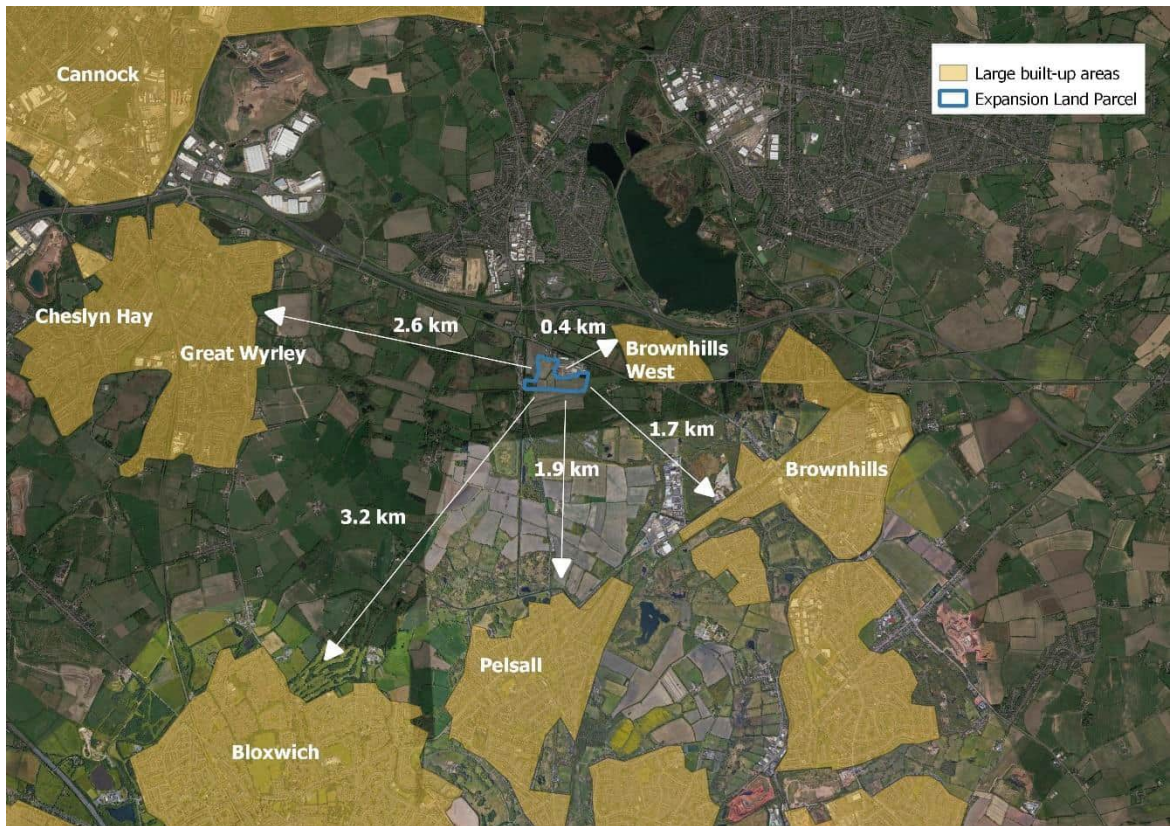
## Green Belt Assessment of Expansion Land Parcel

### Step 1: Consider the ‘relevance’ of each Green Belt purpose

**Does the land have the potential to play a role with regard to Purpose 1: to check the unrestricted sprawl of large built-up areas?**

- 4.63 On page 28 the 2021 LUC Green Belt Assessment defines the large built-up area as the main urban conurbation of Birmingham and associated towns and urban area of Cannock, Cheslyn Hay, Great Wyrley and Hednesford. Paragraph 3.33 notes that settlements deemed close enough to the ‘core’ urban area for development associated with them to be considered to be part of the large built-up area includes the town of Brownhills West.
- 4.64 It is noted that the previous 2016 LUC Assessment included a much broader definition of the large built-up area including ribbon development associated with all inset areas and industrial estates, business parks and gypsy and traveller sites. As stated at paragraph 3.34 of the 2021 LUC Assessment the definition of the large built-up area was tightened to focus on the major urban areas and to be consistent with the neighbouring Green Belt Studies covering the Black Country, South Staffordshire and Lichfield.
- 4.65 As set out on page 30 of the 2021 LUC Assessment Green Belt land does not play a role with regards to Purpose 1 if it is not close enough to the large built-up area to be associated with it. This is the case for the Expansion Land Parcel as shown on **Figure 4.8** below:

Figure 4.8: Purpose 1 Expansion Land Parcel



**Does the land have the potential to play a role with regard to Purpose 2: to prevent neighbouring towns merging into one another?**

4.66 Paragraphs 3.38 and 3.39 of the 2021 LUC Assessment defines Purpose 2 towns as:

- The main urban area, grouped around Cannock, Hednesford and Heath Hayes;
- Rugeley;
- Burntwood;
- Brownhills; and
- Bloxwich.

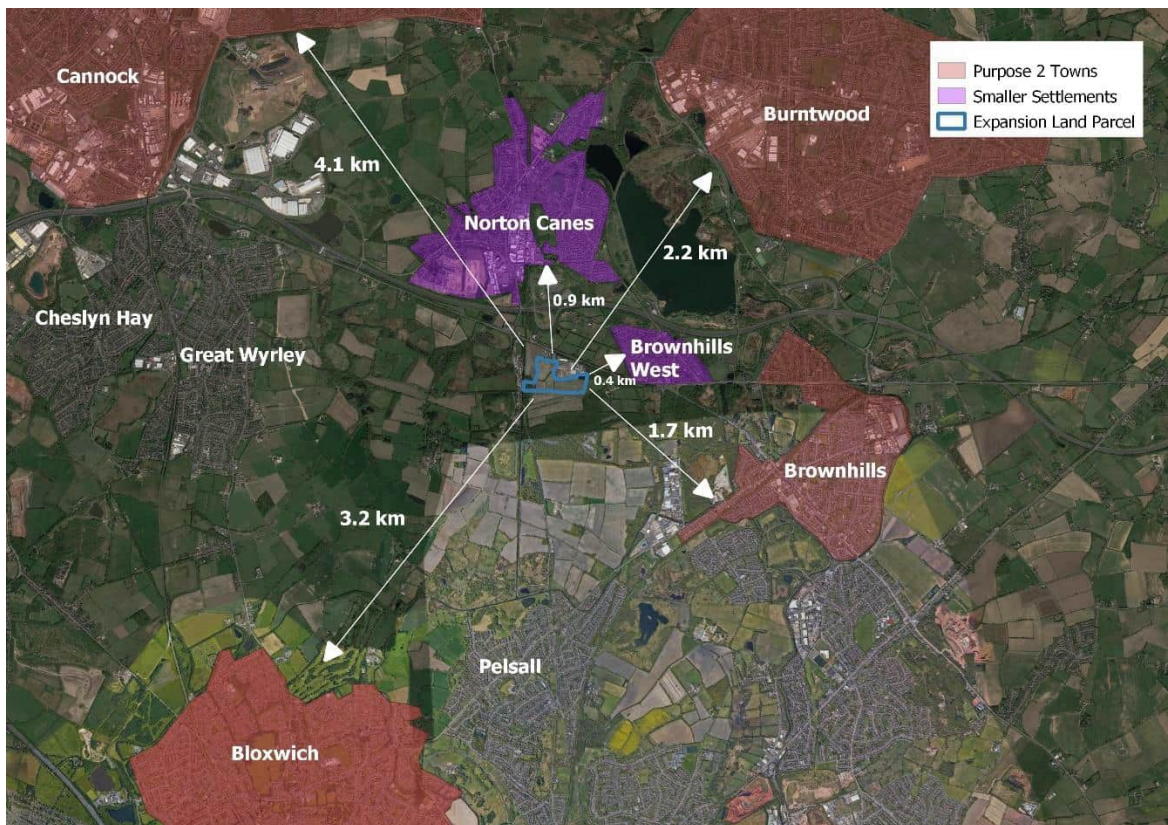
4.67 Paragraph 3.40 of the 2021 LUC Assessment states that:

*“Regardless of whether a particular settlement is large enough to realistically be considered a town, it is acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’. This was taken into account in the study.”*

4.68 As such while neither Brownhills West or Norton Cranes are identified as a Purpose 2 town, RPS has considered as part of this assessment the relationship of the Site with these towns.

4.69 Pages 33 and 34 of the 2021 LUC Assessment states that Green Belt land has less potential to play a role with regards to Purpose 2 - i.e. gap is robust – if there is a wide gap between towns. Urbanising development reduces gaps but there are some significant separating features. This is the case for the Expansion Land Parcel if it is considered to be located within the wide gaps between Burntwood and Bloxwich, and Cannock and Brownhills. The Expansion Land Parcel is not located within the gap between Brownhills West and Norton Canes. These points are illustrated by **Figure 4.9** below:

**Figure 4.9: Purpose 2 Expansion Land Parcel**



4.70 It should be noted that the 2016 LUC Assessment did not consider the wider area in which the Expansion Land Parcel was located to make any contribution to this purpose, stating:

*“The parcel lies to the south of Watling Street Business Park, not a settlement. Therefore, while the wider Green Belt does contribute to preventing neighbouring towns from merging, in isolation, this parcel does not.”*

**Does the land have the potential to play a role with regard to Purpose 3: to assist in safeguarding the countryside from encroachment?**

4.71 As set out at paragraph 3.46 of the 2021 LUC Assessment this considers the extent to which land can be considered to constitute ‘countryside’ on the basis of it’s usage. It does not consider the impact of development which can be considered to reduce openness (in Green Belt terms), or of

development which has a containing urbanising influence, as these are addressed in the analysis at Step 2 and Step 3 respectively.

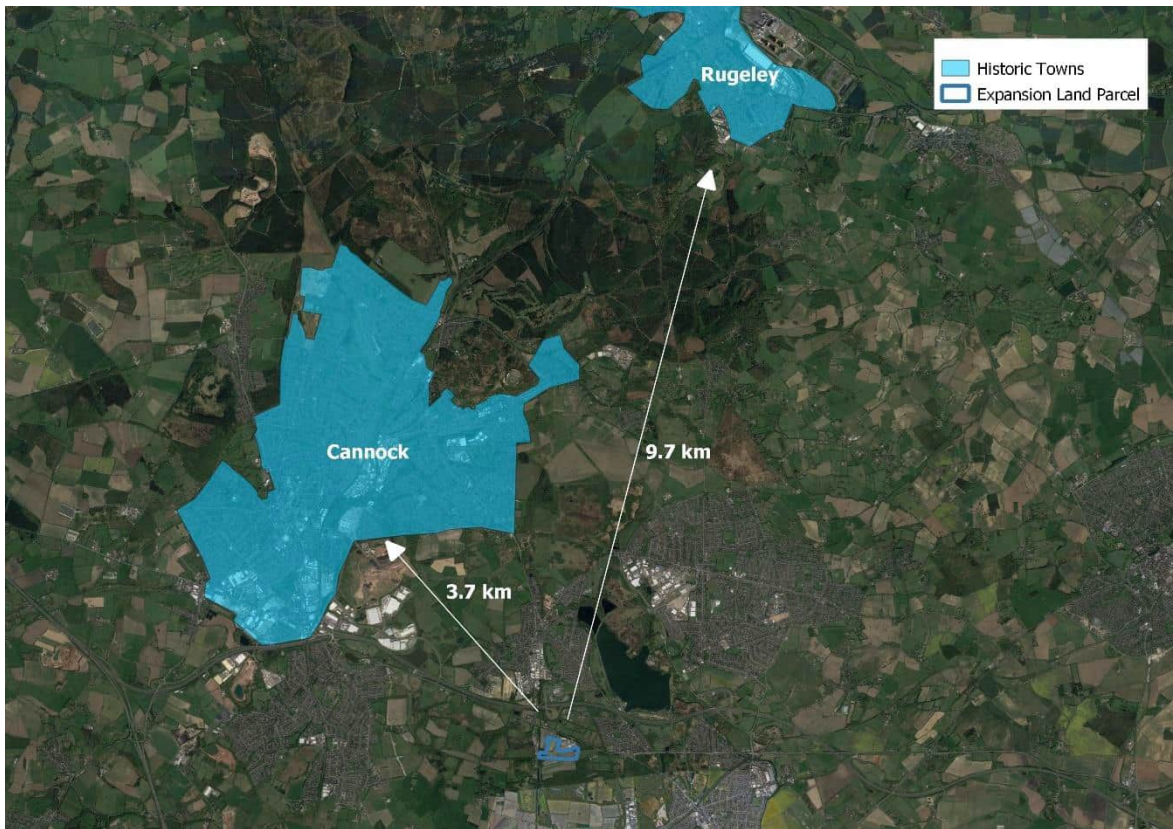
4.72 Paragraph 3.47 of the 2021 LUC Assessment goes on to state that Land may through its usage have a stronger relationship with the adjacent built up area and, as a result, not be considered 'countryside' to the same degree as other open land, but it is important not to stray from assessing the Green Belt purposes into assessing landscape character, sensitivity or value. Whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not taken into consideration: the poor condition of Green Belt land does not necessarily undermine its fundamental role of preventing urban sprawl by keeping land permanently open.

4.73 As set out on page 36 of the 2021 LUC Assessment Green Belt land has the potential to play a stronger role with regards to Purpose 3 if its use is not associated with the urban area. The Expansion Land Parcel is in agricultural use and so has the potential to play a stronger role with regards to Purpose 3.

**Does the land have the potential to play a role with regard to Purpose 4: to preserve the setting and special character of historic towns?**

4.74 Paragraph 3.52 of the 2021 LUC Assessment states that it concluded that land around two settlements within Cannock Chase District – Cannock and Rugeley – should be considered for potential contribution to Purpose 4. The Site, and for the purposes of this assessment the Expansion Land Parcel, does not lie within these areas as shown on **Figure 4.10** below and so does not make a contribution towards Purpose 4.

**Figure 4.10: Purpose 4 Expansion Land Parcel**



4.75

**Does the land have the potential to play a role with regard to Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land?**

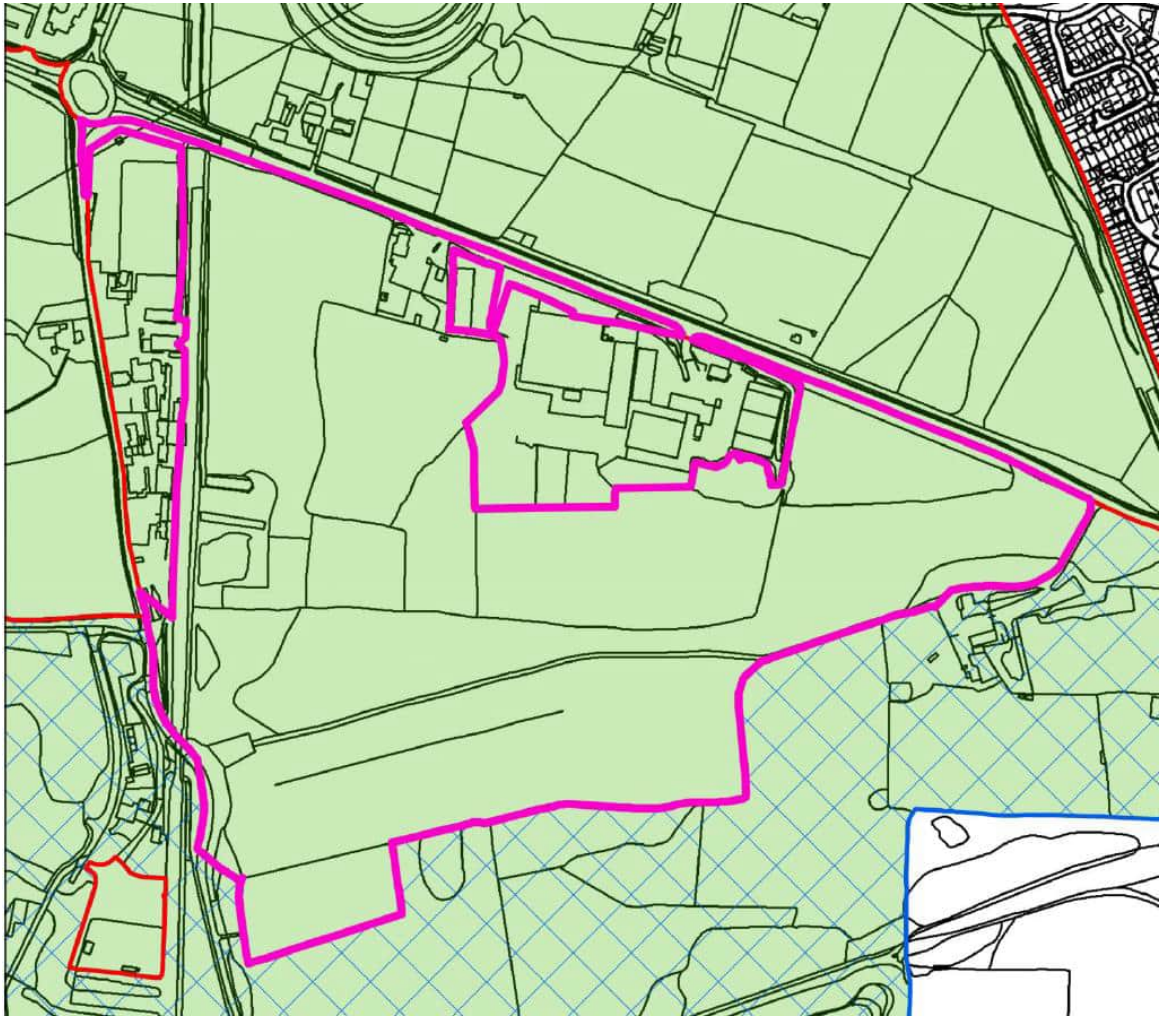
4.76 Paragraph 3.57 of the 2021 LUC Green Belt Assessment notes that due to the nature of the settlement pattern within Cannock, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. As such the 2021 LUC Assessment assumes an even level of contribution to Purpose 5 for all areas of Green Belt based on the average availability of brownfield land across the District. On this basis all parcels of Green Belt land within the District, including the Expansion Land Parcel is considered to make a Strong contribution to Purpose 5.

**Step 2: Identify variations in Green Belt openness**

4.77 At paragraph 3.60 the 2021 LUC Assessment notes that the NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. Accordingly, it notes that the presence of 'urbanising development' within the Green Belt can diminish the contribution of land to the Green Belt purposes.

- 4.78 Paragraph 3.61 of the 2021 LUC Assessment states that Green Belt openness relates to a lack of 'inappropriate built development' rather than visual openness; thus both undeveloped land which screened from view by landscape elements (e.g. tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms. Accordingly, the 2021 LUC Assessment of openness first considers the appropriateness of development. Where development is not 'appropriate', it considers the extent, scale, form and density of development, in order to make a judgement on the degree of openness.
- 4.79 Paragraph 3.63 goes on to state that at a very localised scale, any inappropriate development can be considered to diminish openness, but small areas of isolated development have negligible impact in this respect, and are not therefore defined and assessed as separate parcels of land. Any larger areas of Green Belt land which are judged to be developed to an extent that they lack the 'essential characteristic' of openness are considered to make no contribution to Green Belt purposes. It states that these are defined and mapped.
- 4.80 Paragraph 3.64 of the 2021 LUC Assessment states that the locations defined as outer areas of the Green Belt by the 2021 were not assessed with regards to openness and were assumed to be open, as the assessment of these areas was high level and strategic. Given this the 2021 LUC Assessment has not made a judgement as to whether or not the Expansion Land Parcel is a larger parcel that lacks the 'essential characteristic' of openness as areas of this type within the outer areas have not been assessed. However, the 2016 LUC Assessment assessed the Expansion Land Parcel as part of a wider parcel as shown on **Figure 4.11** below:



**Figure 4.11: 2016 LUC Assessment Parcel**

- 4.81 On the basis of the approach taken in 2021 LUC Assessment the Expansion Land is 'open' in Green Belt terms as there is no built form.

### **Step 3: Identify variations in the distinction between urban areas and the Green Belt**

- 4.82 Paragraph 3.65 of the 2021 LUC Assessment states that Having considered in general terms the variations in the relevance of each of the Green Belt purposes, the next step in the assessment process identifies more localised variations in the relationship between Green Belt land and urban development – i.e. whether the land seems like it is part of the urban area or the countryside.
- 4.83 Paragraph 3.66 of the 2021 LUC Assessment goes on to state that land that is more strongly related to urbanising development typically makes a weaker contribution to all of the first three Green Belt purposes, being less likely to be perceived: as sprawl (Purpose 1), narrowing the gap between towns (Purpose 2), or encroaching on the countryside (Purpose 3). While paragraph 3.67 notes of the 2021

LUC Assessment notes that for Purpose 4 there is no separate consideration of distinction, because contrary to Purposes 1 to 3, land which has a strong relationship with the town is likely to make a greater rather than lesser contribution.

4.84 Paragraph 3.68 of the 2021 LUC Assessment sets out that the process of assessing distinction was carried out on a settlement by settlement basis, for each inset urban area. The analysis was applied as a progression out from each settlement edge, recognising that with distance from that settlement the level of distinction will only increase, not diminish. Notwithstanding our criticisms of the findings of the 2021 LUC Assessment for the adjacent parcel BW1, RPS agree in general with this approach.

4.85 Paragraph 3.69 of the 2021 LUC Assessment states that four interrelated elements were considered to assess distinction between land within the Green Belt and developed land. These are:

- Boundary features.
- Landform and land cover;
- Urbanising visual influence; and
- Urban containment;

4.86 Consideration of these elements was combined, using professional judgement, to give a rating on a 4-point scale (weak, moderate, strong and very strong distinction).

### **Boundary features**

4.87 Paragraph 3.72 of the 2021 LUC Assessment states that for land adjacent to an urban area the analysis only considered the urban boundary, but progressing further from the urban area, the cumulative impact of multiple boundary features increases distinction.

4.88 The Expansion Land Parcel is primarily contained by mature well treed hedgerow and linear tree cover defined on page 53 of the 2021 LUC Assessment as being a moderate boundary, apart from along part of its south western boundary where it is adjacent to the canal. The 2021 LUC Assessment does not include canals within its examples of boundaries, but RPS consider this boundary to be strong as in accordance with the criteria on page 53 of the 2021 LUC Assessment which states:

*“Physical feature significantly restricts access and forms constant edge.”*

4.89 A very small part of the parcel boundary adjacent to the wooded area in the south west of the Site is a weak boundary as there is no significant physical definition.

4.90 Given that the moderate boundary features are the predominant boundary feature it is considered that the overall boundary of the Expansion Land Parcel is moderate.

### **Landform and land cover**

- 4.91 Paragraph 3.74 of the 2021 LUC Assessment notes that as well as landform and land cover serving as boundary features that this may extend into a broader feature which creates greater distinction. Examples are given of a woodland, lake or valley.
- 4.92 There is a woodland located in the south western corner of the Expansion Land Parcel, while a pond is located in the north eastern part of the parcel. However, both of these features cover only a small part of the Expansion Land Parcel and so landform and land cover does not significantly increase the level of distinction.

### **Visual openness**

- 4.93 Paragraph 3.75 of the 2021 LUC Assessment notes that this is not concerned with the scenic quality of views, but the extent to which an absence of visual association with the open Green Belt countryside or, conversely, the extent to which the visual dominance of urban development may increase association with the urban area.
- 4.94 The Expansion Land Parcel is visually contained by mature tree belts and so it is not visually associated with the wider open Green Belt countryside.

### **Urban containment**

- 4.95 This relates to whether existing development to some degree contains an area of open land, thus reducing its distinction from the urban area. The Expansion Land Parcel is contained by the existing urban development at Watling Street Business Park and the Esso Garage immediately to the north and North Lanes to the west on the opposite side of the canal. As such the Expansion Land Parcel is contained on two sides.

### **Distinction of the Site**

- 4.96 The Expansion Land Parcel has predominantly moderate boundary features with surrounding areas. The Expansion Land Parcel does contain landforms or land cover that contribute to distinction, but these features – a pond and a woodland – are only cover a small area and do not make a substantial contribution to the distinction of this parcel. The Expansion Land Parcel is visually contained from the open Green Belt countryside. On the basis of the boundary features and the moderate level of urban containment we consider that the overall level of distinction is only weak.

## Step 4: Assess the contribution of land to the Green Belt Purposes and define parcels

- 4.97 As set out at paragraph 3.81 of the 2021 LUC Assessment this step considers the analysis in each of the previous steps to identify overall contribution rating for each Green Belt purpose. Each area of variation in contribution to one or more of the purposes was defined as a parcel, with contribution ratings and supporting analysis.
- 4.98 For Green Belt Purposes 1, 2 and 3 the relevance (Step 1), openness (Step 2) and distinction (Step 3) are considered to arrive at a judgement on the relative contribution of different areas of land as described at paragraph 3.82 of the LUC 2021 Assessment. The same paragraph goes on to explain that contribution to the Green Belt purposes was rated on a 5-point scale (strong, relatively strong, moderate, relatively weak and weak/no contribution, in accordance with criteria lists on pages 59 to 67 of the 2021 LUC Assessment. It also notes that these criteria lists indicate typical combinations of relevance, openness and distinction, but professional judgement may result in the addition of particular weight to one of these elements.
- 4.99 For Purpose 4 paragraph 3.83 of the 2021 LUC Assessment explains that in accordance with advice from Historic England, judgements were based on specific analysis of the historic town in question, and its relationship with its Green Belt surroundings as set out in the criteria list for Purpose 4.
- 4.100 Paragraph 3.84 of the 2021 LUC Assessment notes that standard text is used to indicate that contribution to Purpose 5 is consistent across all of the study area.
- 4.101 For Purpose 1 paragraph 3.85 of the 2021 LUC Assessment notes that adjacent to settlements the assumption was made that the purpose will remain relevant at least until the level of distinction between the large built-up area and open land reaches a strong level. Beyond this the relevance, and therefore the contribution, will diminish.
- 4.102 Paragraph 3.86 of the 2021 LUC Assessment notes that in between settlements where Purpose 2 is relevant, contribution will likewise reduce at the periphery of the gap. Unlike Purposes 1 and 2, contribution to Purpose 3 will not diminish with distance from urban areas and will consequently be high for all land beyond those areas that do not have strong distinction from an urban area.

### Contribution of the Expansion Land Parcel to the Green Belt Purposes

- 4.103 RPS consider that the Expansion Land Parcel consists of an area with a variation in contribution to one or more of the purposes and so should be defined as a parcel. The surrounding linear tree belts act as boundary features that contain the parcel. Set out below is our assessment of the contribution of this parcel to each purpose in accordance with the criteria set out on page 59 to 67 of the LUC 2021 Assessment.

**Purpose 1**

- 4.104 The Expansion Land Parcel is not close to a large built-up area and so makes no contribution to Purpose 1.

**Purpose 2**

- 4.105 RPS contend that the substantial distance between towns and the presence of urbanising development means that the Expansion Land Parcel does not lie between neighbouring towns and so makes no contribution to Purpose 2.
- 4.106 If the Expansion Land Parcel is considered to lie between neighbouring towns then it is open, lies within a robust gap and has weak distinction from the inset settlement edge and so on this basis would make a weak contribution to Purpose 2.

**Purpose 3**

- 4.107 The Expansion Land Parcel is open and land use is not associated with the urban area. It has weak distinction from the inset settlement edge and so makes a relatively weak contribution to Purpose 3.

**Purpose 4**

- 4.108 The Expansion Land Parcel does not contribute to the historic setting or special character of either Cannock or Rugeley and so makes no contribution to Purpose 4.

**Purpose 5**

- 4.109 Paragraph 3.89 of the 2021 LUC Assessment states that all Green Belt land is considered to make strong contribution to Purpose 5.

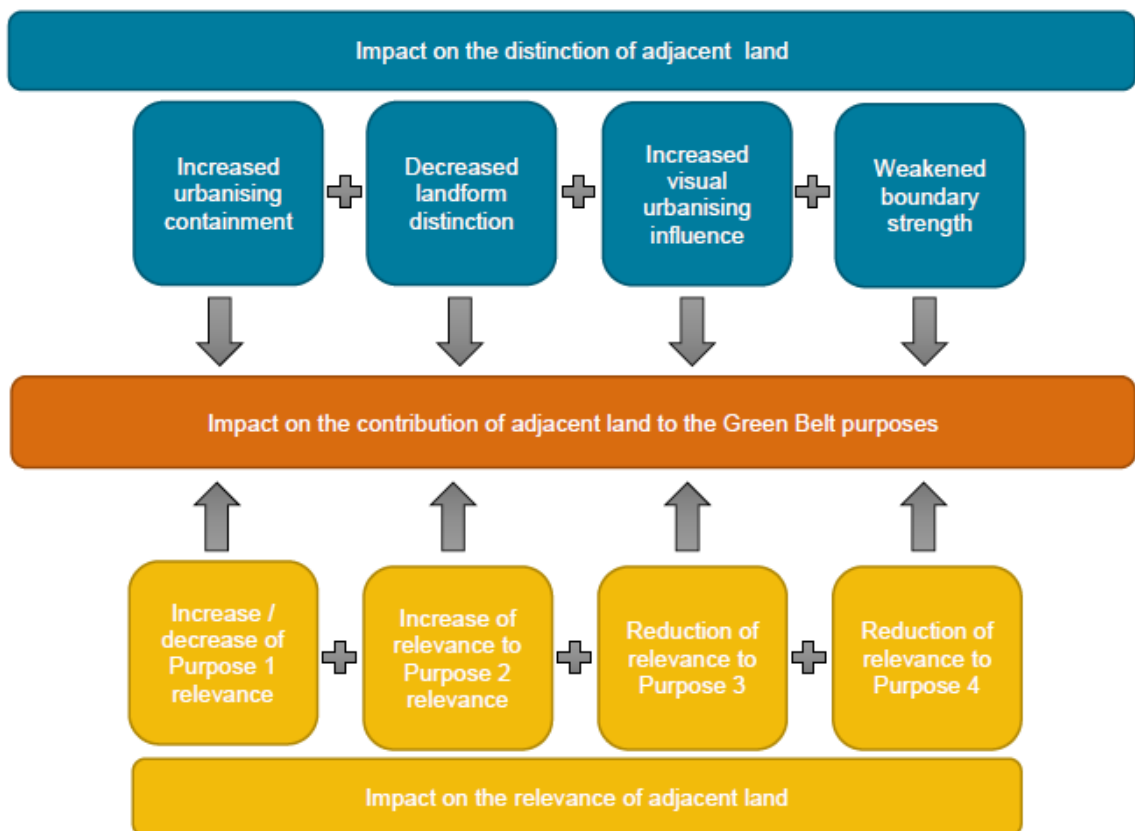
**Loss of contribution**

- 4.110 As set out at paragraph 3.90 of the 2021 LUC Assessment the loss of contribution to the Green Belt purposes as a result of the release of a parcel of land equates to the contribution ratings assessed for that parcel.
- 4.111 Paragraph 3.91 of the 2021 LUC Assessment notes that in cases where release of a parcel would also, in order to form an expansion of the inset settlement, necessitate the release of intervening land, the loss of contribution is that associated with the highest contributing parcel. This does not apply to the Expansion Land Parcel.

## Step 5: Assess additional impact of release on adjacent Green Belt

- 4.112 As noted earlier, paragraph 3.93 of the 2021 LUC Assessment defines adjacent Green Belt land as the land that lies next to and/or in close proximity to land / parcels being assessed for potential release.
- 4.113 Paragraph 3.94 goes on to state that the assessment of the additional impact of the release of land on adjacent Green Belt land considered two factors: the impact on the distinction (from inset areas) of the adjacent land and the impact on the relevance of the adjacent land to the NPPF purposes. The third factor, openness, is not relevant to the assessment of impact on adjacent land as it is assumed that adjacent land will remain open. **Figure 4.12** below which is Figure 3.3 in the 2021 LUC Assessment illustrates the elements to be considered when assessing the impact of the release on adjacent Green Belt land.
- 4.114 It should be noted that this approach is unusual and not consistent with RPS’s substantial experience of undertaking and reviewing Green Belt Assessments elsewhere, however to ensure constituency and aid in allowing the findings of this assessment to be compared with the 2021 LUC Assessment we have followed the same methodology.

**Figure 4.12: Variations in impact on release of adjacent land**



### **Impact on distinction**

- 4.115 The release of the Expansion Land Parcel would increase the urban containment of the land to west between the parcel and the canal and so would weaken the distinction of adjacent Green Belt land. Therefore, it would affect the contribution of adjacent land to Green Belt Purposes and so the harm of the release of the Business Park Parcel would increase on this basis.

### **Impact on relevance**

- 4.116 The release of the Expansion Land Parcel would not lead to adjacent land becoming close enough to the inset edges of the large built-up area or lead to adjacent retained Green Belt land becoming perceived as being within the large built-up area. Hence, its release would not affect any adjacent land with regards to its relevance for Purpose 1 as explained at paragraph 3.99 of the 2021 LUC Assessment. It would also not lead to any substantial change in the settlement gap and so would not change the relevance of Purpose 2 for adjacent parcels of land as set out at paragraph 3.100 of the 2021 LUC Assessment.
- 4.117 Paragraph 3.101 notes that the relevance of adjacent retained Green Belt land to purpose 3 would rarely be affected. Its release would not result in adjacent land becoming contained to the extent that that it is too isolated from the wider Green Belt to be considered part of the countryside.
- 4.118 Adjacent Green Belt land does not make a contribution to Purpose 4 and so the release of the Expansion Land Parcel would not harm the relevance of adjacent parcels of Green Belt in keeping with the approach set out in paragraph 3.102 of the 2021 LUC Assessment.

### **Level of impact on adjacent land**

- 4.119 Paragraph 3.103 of the 2021 LUC Assessment states that the level of harm from the release of a parcel only increases if the adjacent land makes a stronger contribution to Green Belt purposes than the land within the parcel that is being released.
- 4.120 RPS have not produced separate assessments of all adjacent Green Belt land and the 2021 LUC Assessment included the adjacent land within the same outer area as the Expansion Land Parcel. However, consider that the adjacent parcels that have not been assessed to only make the same level of contribution to the purposes of the Green Belt as the Expansion Land Parcel. As such the release of the Expansion Land Parcel would not impact on land that makes a greater contribution to the purposes of the Green Belt.
- 4.121 It should also be noted that the 2016 LUC Assessment assessed the Expansion Land Parcel and adjacent parcels as part of one parcel. While there are differences in the methodology used by the 2021 LUC Assessment and 2016 LUC Assessment, this combining of the Expansion Land Parcel

with adjacent parcels suggests that the contribution made by the adjacent parcels is similar to that of the Expansion Land Parcel.

4.122 Overall the release of the Expansion Land Parcel would only have a negligible impact on adjacent Green Belt land as it would not impact the distinction of adjacent Green Belt land or relevance of this land to Green Belt purposes as per the guidance notes and examples set out on pages 73 to 76 of the 2021 LUC Assessment.

## Step 6: Define variations in harm to the Green Belt around the inset edge

### Assessment of harm

4.123 RPS notes that all parcels considered by the 2021 LUC Assessment were considered to make a strong contribution to Purpose 5. Although it is not expressly stated in the 2021 LUC Assessment it is clear that the contribution made to Purpose 5 has not informed the final assessment of harm for the potential release of individual parcels. This is because the potential release of a number of parcels has been assessed as only resulting in levels of harm at the level of moderate – low harm which can only be achieved by the loss of a contribution assessed as being moderate or lower.

4.124 RPS consider the Expansion Land Parcel to make a relatively weak contributions to Purpose 3 and no contribution to purposes 1, 2, and 4 of the Green Belt. Its release would constitute a negligible impact on adjacent Green Belt land therefore the level of harm that would be caused by its release is very low harm, as per the benchmarks set out on pages 79 to 80 of the 2021 LUC Assessment.

4.125 As noted above RPS consider the Expansion Land Parcel to only make a weak contribution to Purpose 5. If Purpose 5 is considered as part of the assessment of harm then this would still result in an overall assessment of very low harm.

4.126 If it is considered that the Expansion Land Parcel makes a strong contribution to Purpose 5 and this is included in the assessment of harm, which is contrary to the approach taken for a number of other sites, then at most the release of the release of the Expansion Land Parcel would result in moderate harm.

4.127 **Table 4.2** below provides a summary of our assessment:

**Table 4.2: Summary of Findings for Expansion Land Parcel**

Settlement	Release Scenario	Area (ha)	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Harm Rating
Brownhills West	Release of Expansion Land Parcel	6.1	No	No	Relatively Weak	No	Weak	Very Low



**Appendix D**  
**Vision Document**



# Watling Street, Cannock

# **Vision Document**

March 2017



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# 1.0 Introduction

This Vision Document has been prepared by St Modwen to support the proposal for an expansion of the Watling Street Business Park, Cannock.

## Our Vision

Our vision sets out the potential to expand the existing Business Park in a sustainable way which meets the future requirements, expectations and aspirations of Cannock Chase District Council. The site presents an excellent opportunity to deliver employment development within the current plan period.

The expansion land (5.45Ha) is situated immediately adjacent to the established Business Park and benefits from the existing access and infrastructure serving the current development. Existing business operators would be able to continue to operate with minimal disruption.

The site is also very well located in relation to the strategic highways network being accessed off the A5 Watling Street and lying in close proximity to the junction with the M6 (Toll), a location attractive to the expansion of existing businesses and providing opportunity for new inward investment.

Proposed built development would be screened very effectively at the outset by the established framework of hedgerows, tree belts and woodland copses located along the site's perimeter. Such features will be retained as the basis for a comprehensive Green Infrastructure framework, which encompasses the site.

There are no substantive environmental constraints which prohibit the expansion of the Business Park. The whole site area would measure approximately 12Ha and its removal from the Green Belt would not undermine the overall purposes and integrity of the Green Belt.

The landscape within which the site sits is visually enclosed by the existing Business Park and A5 Watling Street to the north, the Cannock Extension Canal to the west, and by woodland at Wyrley Common to the south.

Watling Street can deliver sustainable high quality employment development meeting the following objectives:

- Provide opportunities for employment development at a strategic location.
- Provide development in a sustainable location extending the existing Business Park.
- Provide development in a location without detriment to the local landscape character or visual amenities of the rights of way network.
- Create a cohesive Green Infrastructure centred on the framework of retained hedgerows and tree belts.
- Existing retained features to be supplemented with new habitats maximising opportunities for biodiversity and landscape enhancement.



*“To create a sustainable, high quality employment led development.”*

# 2.0

## Site and Surroundings

The site covers around 5.45Ha of land and lies to the south of Watling Street (A5), to the south east of Cannock and to the south west of the town of Brownhills West.

### Location

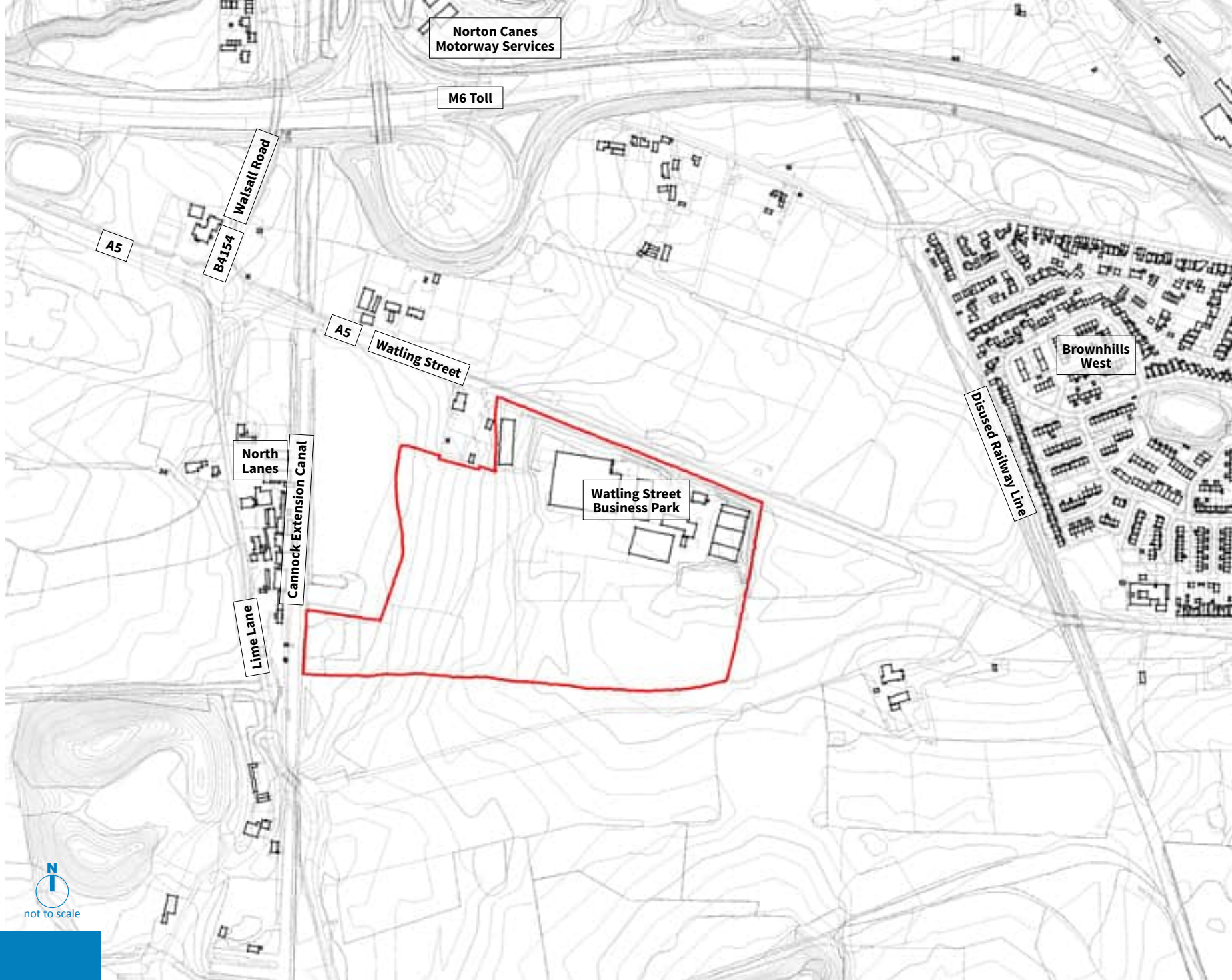
The site lies to the south of the Cannock Chase District within Southern Staffordshire. It is conveniently located off the strategic highways network, directly to the south of the A5 Watling Street and in close proximity to the M6 (Toll).

Within the surrounding area Brownhills is situated 0.4km away to the east, whilst Norton Canes lies 0.5km away to the north. Other settlements nearby include Great Wyrley and Cannock (approximately 2.5km to the west) whilst Pelsall lies 2km to the south. A range of commercial and industrial estate developments are present within the surrounding area by the outskirts of existing settlements.

Cannock Extension Canal lies in close proximity to the west of the site. Norton Canes Moorings, an existing business, is situated to the west of the Canal at North Lanes.

As well as the existing Business Park on Watling Street, other developments nearby include Moss Farm/Farm Shop and the public house by the Watling Street/Walsall Road roundabout.

The site is visually well screened from all of the existing settlements in the local area. Established tree belts are present along the entire perimeter of the site and there are substantial woodlands present through the surrounding landscape.



Key  
Ownership Boundary  
(5.45Ha)



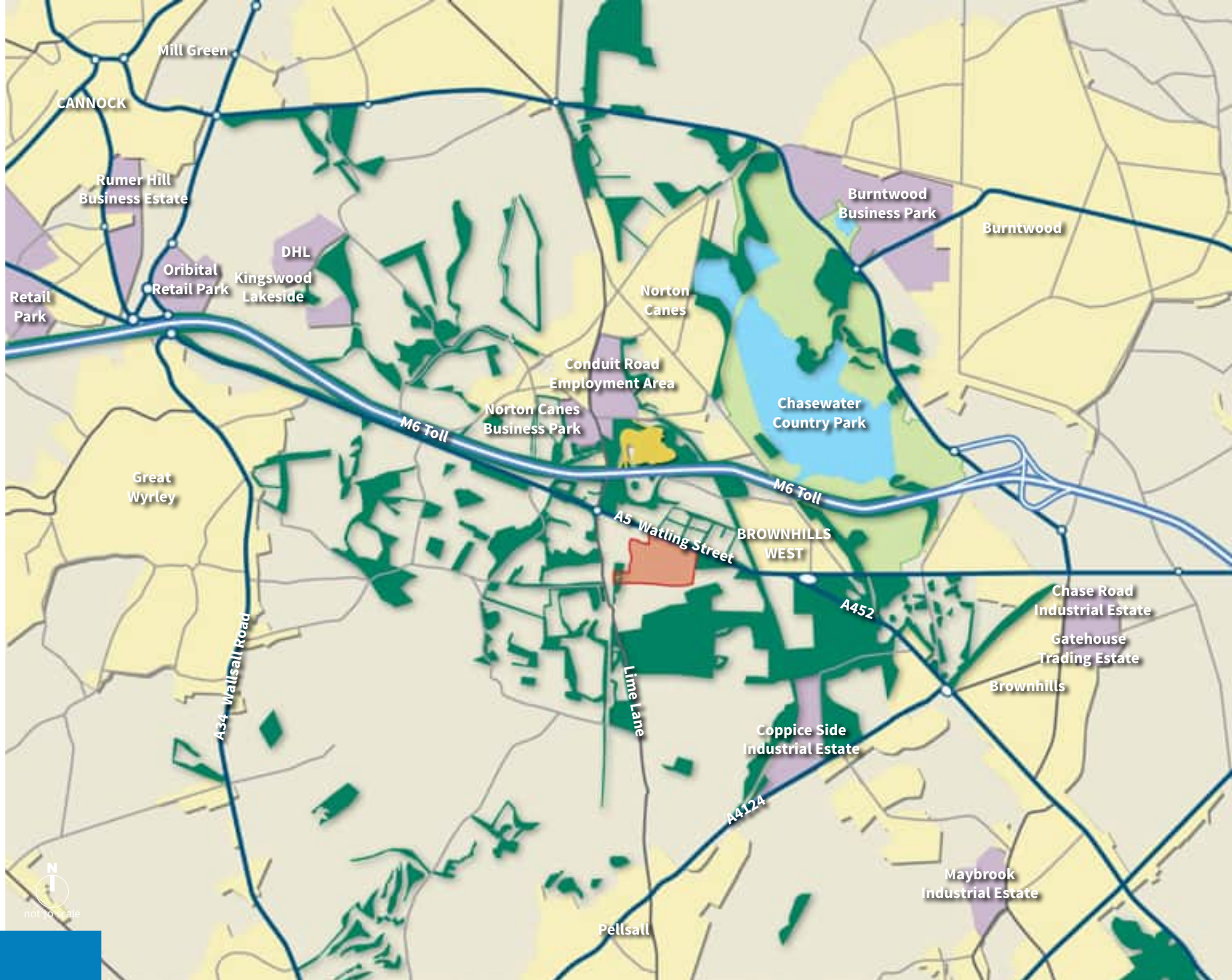
## Site Location





Aerial view from the south

- Ownership
- Boundary
- Existing Settlements
- Other Business Park/  
Industrial Estate/  
Employment
- Norton Canes  
Motorway Services
- Chasewater Country  
Park
- Existing Woodland
- M6 Toll
- A Roads
- Secondary Roads



**Context Plan**

## 2.0 Site and Surroundings

### Site Description

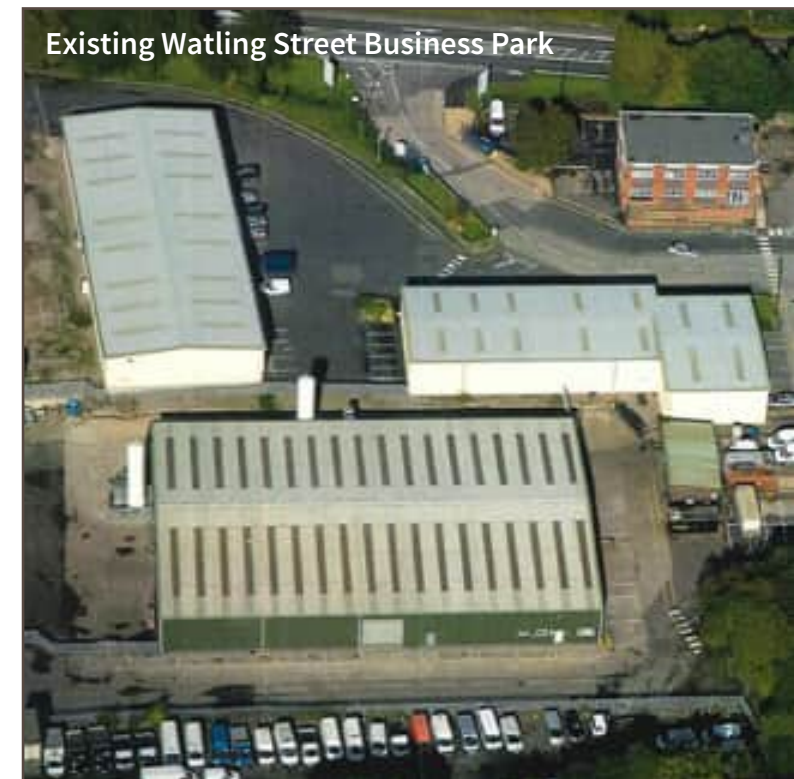
The whole site is owned by St Modwen including the existing Watling Street Business Park along with expansion land situated immediately to the south and west of the Business Park.

The Business Park (6.1Ha) currently provides over 150,000 square feet (13,935m<sup>2</sup>) of warehousing, offices and open storage, accommodating a range of occupiers and uses including furniture making, bicycle repair shop, vehicle electronics/repair, lease vehicle repair/maintenance, caravan/motorhome showroom, medical gases/equipment supplier, and a recycling facility for IT equipment. An open storage facility is currently located within the southern part of the existing Business Park.

The main entrance and access into the site is off the A5 Watling Street with an internal circulation road serving particular units/buildings.

Established tree belts/hedgerows are present along the perimeter of the Business Park, and around the pond located at the south eastern corner of the Business Park. Consequently the existing buildings are well screened from the surrounding area.

The expansion land (5.45Ha) adjoining the Business Park comprises of 5 fields currently in agricultural use, the majority of which are in arable use with the exception of woodland located by the Cannock Extension Canal. The field boundaries are very well defined by an established framework of hedgerows and tree belts, and generally intact aside from small gaps for agricultural accesses.





A5

A5 Watling Street

North Lanes

Watling Street Business Park

Cannock Extension Canal

Lime Lane

Key

 Ownership Boundary

  
not to scale

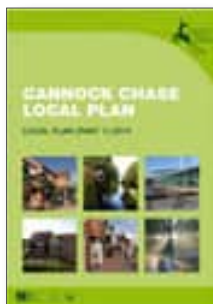
Aerial Photograph

# 3.0 Local Plan Position

*“The Cannock Chase Local Plan is the statutory development plan for Cannock Chase Council and forms the principal basis for which development is promoted and controlled.”*

## Adopted Local Plan Part 1

The Cannock Local Plan (Part 1) (LPP1) was adopted in June 2014. It covers the plan period of 2006-2028 and sets out the overarching strategy for growth and specific employment policies for the District.



Specifically in relation to employment land, CP8 of LPP1 establishes the need for **‘at least 88ha’** of employment land to be provided over the plan period. The policy noted at that time completions totalling 34ha and set an expectation of a further 57ha to come forward within the plan period, exceeding the 88ha target. The policy listed the key employment areas that this land was expected to be delivered. LPP1 seeks an average delivery of 4ha per annum. At paragraph 4.53 it states:

*“The overall strategy is to focus development upon the highest quality and attractive Brownfield and restored sites, followed by consideration of Greenfield or Green Belt sites where required.”*

At paragraph 4.61 LPP1 identifies that there may be a need to alter Green Belt boundaries in order to ensure the longevity of employment provision and the Green Belt boundaries. A parcel of land adjacent to Kingswood Lakeside has been identified as an option for longer-term expansion, within the plan period. The paragraph goes on to state that the need for the release of this site will be **“monitored against the demands for both the quantity and quality of land”**.

The strategy within paragraph 4.57 of LPP1 highlights the importance of not just the right amount, but also the right type of employment land in the right locations, to help achieve the desired transition of the local economy from traditional manufacturing based employment towards more professional services and high-tech manufacturing/research and development.

Watling Street Business Park is specifically mentioned within Part 1 acknowledging its existing Green Belt location and the potential for redevelopment of the site.

*“Proposals for employment developments at existing employment sites within the Green Belt will be treated positively (in accordance with other Core Strategy policies and national Green Belt policy) recognising that they are unlikely to be suitable for alternative uses. Further guidance for the redevelopment of the following sites will be supported by Local Plan Part 2 policies and Supplementary Planning Documents as appropriate:*

*.....Watling Street Business Park”*



Aerial view from the east

## 3.0 Local Plan Position

### Local Plan Part 2

The emerging Local Plan (Part 2) (LPP2) will allocate sites for residential and commercial uses to ensure that the targets in LPP1 can be delivered. The first round of consultation is on the Issues and Options draft LPP2, with public consultation taking place between January and March 2017. The Council's current timetable sees the proposed submission draft consultation taking place in summer 2017, followed by submission to the Secretary of State expected by the end of 2017.

The employment requirements of LPP2 are currently based on the 88ha requirement set out within LPP1, whilst acknowledging that this requires a review of the delivery rate and type of employment land. LPP2 does however acknowledge that based on its assessment of need and supply a deficit of employment land currently exists of approximately 3ha. It also suggests that the Council should be looking to potentially remove and safeguard land from the Green Belt for future employment needs of approximately 4.4ha. It is specifically seeking views on where that potential future employment land can come from.

In this respect LPP2 specifically acknowledges that of the employment sites already identified in LPP2 only Watling Street Business Park is being promoted/ considered for future expansion and indicates that LPP2 needs to give some policy consideration to its potential expansion, following the Green Belt assessment process:

***"For Instance, consideration may need to be given to a site specific policy for the existing Watling Street Business Park site area alongside the site extension proposals, subject to the outcomes of the site assessment process e.g. potential removal of the existing business park from the Green Belt."***

St Modwen is actively promoting the expansion of the Watling Street site and through the LPP2 process considers its expansion proposals for the site can assist with meeting some of the District's employment requirements.





Southerly view over the western part of the site



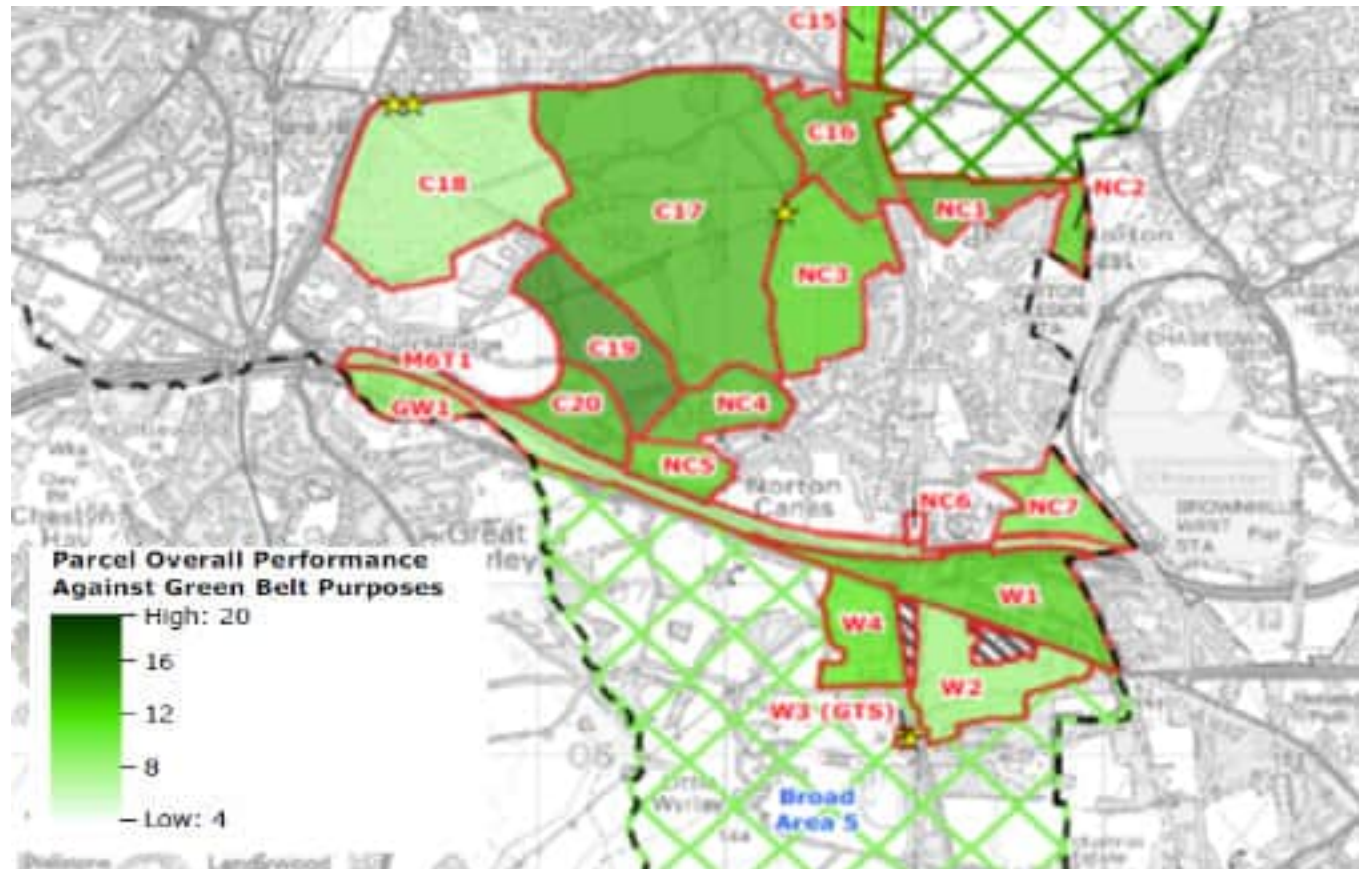
# 3.0 Local Plan Position

## Green Belt Review

As indicated earlier the draft LPP2 has indicated there is a need to review the Green Belt in order to accommodate the plans development requirements.

As part of this process, a Green Belt Study (March 2016) (GBS) was conducted by the Council's consultants, LUC to assess the extent to which areas of the land within the Cannock Chase Green Belt performs against the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF).

The GBS considered a number of land parcels based upon broadly homogeneous land uses/characteristics and were defined by easily recognisable and permanent boundaries. An extract of the GBS final scoring is shown below. The extension to the Business Park is included within site W2 opposite.



This parcel is shown to provide a low contribution to the Green Belt and is given an overall scoring of 9 out of 20. In this context, the table opposite summarises the GBS scores for all of the parcels that are currently being considered as options for employment land within LPP2.

The table illustrates site W2 makes the least contribution to the Green Belt purposes. Further, the parcels that make up other potential employment sites including Kingswood Lakeside have a higher score in the GBS and so are of greater importance for the contribution they provide to the Green Belt. These parcels generally scored more highly than the land adjacent to Watling Street Business Park due to the crucial role they provide in preventing the coalescence of Cannock and Norton Canes urban areas.

It is also noted that Sites NE8, NE10 and NE11 which are also being considered for allocation but were not included for detailed Green Belt assessment as they are within the “Broad Areas Assessment”. This omission of a detailed assessment highlights the remote nature of these sites specifically.

From the scores given in the Green Belt review it is clear that the parcel adjoining Watling Street Business Park (Site W2) provides the least contribution to the purposes of the Green Belt of all the employment sites being considered and unlike other potential employment sites no impact on the coalescence of Cannock and Norton Canes.

LPP2 Ref	GBS Ref	Location	P1	P2	P3	P4	P5	Total
CE18	C19	Kingswood Lakeside 2 (north)	4	4	4	0	4	16
CE17	C20	Kingswood Lakeside 1 (south)	3	4	3	0	4	14
CE56	C16	Wider parcel including land at junction	3	4	3	0	4	14
NE5	W1	Land Parcel including Turf Field	2	4	3	0	4	13
CE19	GW1	Land between A5 and M6 Toll	1	4	1	0	4	10
RE25	R9	Land south of “The Levels” Industrial Estate, Rugeley	2	0	3	0	4	9
CE20	W2	Land at Watling Street Business Park	2	0	3	0	4	9

# 4.0 Employment Land Assessment

As indicated in chapter 3, the Local Plan (Part 2) is currently being prepared by the Council and as part of that process it is currently considering its approach to the employment requirements of the District.

## The Employment Needs of the District

LPP2 is currently consulting on the sites which can deliver the 88ha minimum requirement from LPP1. However, in the context of future employment land requirements, there exists considerable uncertainty over whether that 88ha minimum requirement remains a robust figure. Whilst it will be the role of LPP2 to consider this issue, there are three factors which would suggest this requirement should be increased:

- **Firstly**, the 88ha remains a minimum figure from the LPP1 and this was based on an evidence base which suggested the employment requirement could be a range of up-to 110ha to 2028 and 130ha to 2031. The 88ha figure was very much at the lower end of this range and the Council's employment report concluded that should Cannock continue to accommodate large-scale warehousing schemes, as has been the case, then this could necessitate higher levels of provision above the 88ha. As explained later in this document this situation has taken place;

- **Secondly**, the employment land review which established the 88ha figure (by NLP) was undertaken in 2012 and is now some 5 years old and based on Experian economic forecasts and modelling at that time. The Council does not appear to have re-visited that economic modelling work. The updated Experian forecast appears to indicate justification for an uplift;

- **Thirdly**, LPP2 is suggesting the plan should provide for an additional 1,000 homes from Birmingham's overspill requirements. In this respect it is important to ensure local job opportunities are provided in Cannock to cater for this increased labour supply in a balanced and sustainable manner. A point acknowledged by the LPP1 Inspector's report (paragraph 25) where he supported the 88ha employment requirement, stating this was balanced with the 5,300 dwelling requirements of the Local Plan: *"The strategy provides a balance between new housing and employment development, meeting housing needs without reducing jobs or the workforce."*

Not only is the 88ha figure a minimum requirement, given the above, it would appear that the Council should be considering whether, based on up-to-date information, it remains a robust assessment of employment needs.



Aerial view from the north

# 4.0 Employment Land Assessment

## The Employment Land Supply in the District

St Modwen has assessed the employment land supply within the District and as explained below, the picture is clear that there is insufficient land available to accommodate even the 88ha minimum requirement from LPP1 and also a very limited current pool of available supply.

The existing completions and the sites that make up the supply of employment land are outlined within the draft LPP2 and the Council's Employment Land Availability Assessment 2016 (ELAA 2016). It acknowledges that removing the Mill Green site (which now has consent for retail) from the available supply would also leave the Council in a land supply deficit.

Table 1 clarifies the Council's understanding of there being insufficient land within the 'available' supply to meet the minimum 88ha employment requirement, with a 3ha deficit. The second part of this table makes an assessment of the actual 'available' supply as at December 2016. LPP1 expected 26ha of employment

land at Kingswood Lakeside over the plan period (30% of the total requirement for the District). As a result of recent completions and commitments at this site, the actual supply available to the market amounts to only 2.7ha or just 3% of the 88ha requirement.

Simply based on the Council's own assessment, it is clear there is both insufficient land to meet the 88ha minimum requirement and also insufficient B Class employment land in the District to cater for the next 12 years and the 2028 plan period requirement.

**Table 1: Summary of completed and available sites**

Source of supply	Supply (in ha-rounded)	% Supply against Local Plan Target (88ha)
Completions 2006-15	46	52%
All Available sites (minus Mill Green)	39	44%
Total Supply Identified	85	97%

*Source: draft LPP2 (2016)*

NB. Available supply at Kingswood Lakeside as of December 2016 (accounting for sites under construction and commitments)	2.7	3%
--	-----	----

Whilst the Council’s own assessment demonstrates a deficiency in supply, St Modwen has undertaken a further detailed review of the current employment land position and this information is supplied in a separate submission to the LPP2 consultation. The key findings regarding this site by site assessment of supply illustrate a number of inconsistencies in the methodology of including sites within the ‘available supply’ based on the Council’s 2016 Employment Land Review.

It considers which sites are likely to come forward within the plan period and has deducted those long-standing sites that have not come forward, as well as sites that are known to be no longer being pursued by the owners and therefore not available. The result of the assessment is summarised on Table 2.

**Table 2: Summary of findings**

	CCDC	STM
<b>Completions 2006-15</b>	46ha	43ha
<b>Available Supply</b>	39ha	32ha
<b>Total Supply (2006-2028)</b>	85ha	75ha
<b>Local Plan Part 1 Requirement</b>	88ha	88ha
<b>Balance</b>	-3ha	-13ha

This assessment process demonstrates the employment land supply position at Cannock is in a far worse position than that being portrayed by the Council. Using this information, as indicated above, the ‘total supply’ is only 76ha, making the deficit significantly greater at **-13 hectares of land**.

In St Modwen’s view it is therefore essential that the Council take the opportunity through Part 2 of the Local Plan to meet its minimum requirement for employment land provision.

### Qualitative Employment Provision at Cannock

In addition to numerical requirements for employment land at Cannock, an assessment of the Council’s employment completion records has illustrated a very significant component of the Council’s employment land which has come forward in recent years has focused on the Kingswood Lakeside site. This has however, progressed with primarily large format, storage/distribution or high-tech units, as anticipated by the Council.

Further employment areas have not come forward in the manner expected, and others, such as Mill Green which would have contained a mix of unit size and users, have been removed from the supply completely.

There is therefore now a deficit in new, small-medium sized, mixed-use units that would appeal to a different market sector to those businesses looking to locate at Kingswood Lakeside. Such units currently exist at the existing Watling Street Business Park, although as stated in the following section, are fully occupied.

## 4.0 Employment Land Assessment

### Employment Uses at Watling Street Business Park

The existing Watling Street Business Park currently occupies an area of 6ha. The site is both owned and managed by SMD. The site is attractive to the employment market, given its excellent locational linkages direct off the A5 and close to the M6 Toll Road. The site comprises 17 units and 5 compound areas which are set out on Table 3. Table 3 also includes the current occupiers of each unit.

The schedule demonstrates the variety of unit sizes that are available within the Business Park. This variety has been part of the key to attracting and retaining tenants over the years. By comparison with the land provision at Kingswood Lakeside and Tower Business Park, the unit sizes are of a considerably smaller format and attractive to a more local/regional market sector, with the maximum building unit size of 4,518 sqm (48,632 sq ft) and an average unit size of 800sqm.

**Table 3: Occupancy of Watling Street Business Park**

Unit	Size (sqm GIA)	Current Occupier
Unit 1	303	Nicholas John Thake
Unit 2	786	Icon Exhibitions Ltd
Unit 3	899	Icon Exhibitions and Display Ltd.
Unit 4	656	Nigel Ashley Bailey & Kim Alexa Bailey
Unit 7	50	David Stockwell
Unit 8A	238	Universal Hose Limited
Unit 8B	197	Midland Caravan & Leisure Limited
Unit 8C	300	Cannock Tachograph Centre Limited.
Unit 9A	384	Peppermill Antiques Ltd.
Unit 9B	257	Stephen Robert Griffiths
Unit 9C	393	Pro Freight Solutions Ltd
Unit 10	2,006	Medical Gas Solutions Limited
Unit 16	4,518	Pro Freight Solutions Ltd
Unit 16A	1,504	PRM Green Technologies Limited.
Units 21 & 22	1,129	J & L Fleetcare Limited
Oak House	393	Action Today Group Limited
Compound 1	2,300	Cannock Commercials Ltd.
Compound 2	3,270	Cannock Commercials Ltd.
Compound 3	2,245	Kevin Homer
Compound 4	2,570	CPC Civils Limited
Compound 5	4,845	Clarkes Cabin Transport Limited



**AREAS SCHEDULE**  
(approx GIA footprint)

Unit 1 = 304 sq.m
Unit 2 = 786 sq.m
Unit 3 = 679 sq.m
Unit 4 = 656 sq.m
Unit 7 = 50 sq.m
Unit 8A = 238 sq.m
Unit 8B = 197 sq.m
Unit 8C = 300 sq.m
Unit 9A = 384 sq.m
Unit 9B = 257 sq.m
Unit 9C = 392 sq.m
Unit 10 = 2,096 sq.m
Unit 16 = 4,504 sq.m
Unit 16A = 1,729 sq.m
Unit 21 = 870 sq.m
Unit 22 = 259 sq.m
Oak House = 372 sq.m



## 4.0 Employment Land Assessment

The sizes and formats of units available at Watling Street have proven to be extremely successful, to the extent that all of the units are currently occupied (March 2017) which equates to a 100% occupancy rate. This high occupancy rate also positively reflects St Modwen's effective operation of the Business Park as estate managers.

In addition, over half of the tenancy agreements for the units exceed 5 years with some occupiers signed up for over 10 years. The lack of vacancies and the length of the tenancy agreements demonstrate the significant demand for units of this type in this location. There has also been significant recent investment in the Business Park by St Modwen, including the complete refurbishment and modernisation of Unit 16. The unit has since been occupied by Pro Freight Solutions Ltd who were seeking a unit to expand their existing local operation. Currently no expansion unit exists.

This assessment illustrates the success of this site's location and the employment land/unit offering at Watling Street. Overall, as demonstrated in the following sections, the available land to the south and west of the Park which is within St Modwen's ownership would enable an expansion to the Park, in a location attractive to the market.

St Modwen is promoting the expansion and would construct the units and then operate and manage the Business Park going forward. Their track record and "all-in-one" involvement gives certainty to the deliverability of the proposed development and provides reassurance for on-going management of the site.



## 4.0 Employment Land Assessment



Northerly view from the southern site boundary



Westerly view from the south eastern corner of the site

# 5.0 Highways & Transport

## A highly sustainable location for development.

### Local Highway Network

Watling Street Business Park is accessed directly from the A5 Watling Street by way of an all-movements priority controlled T-junction.

The A5 Watling Street is a strategic link, part of the national strategic highway network maintained by Highways England (HE). The section of the A5 onto which Watling Business Park gains access runs between Tamworth / the M42 (to the east) and Cannock / the M6 (to the west).

### Sustainability

Watling Street Business Park is situated within a walking / cycling distance of less than 2km from the whole of the residential area which makes up Brownhills West whilst parts of residential areas within the wider Brownhills area, Little Norton and Norton Canes are also situated within a 2km walking / cycling distance of the Business Park.

The public transport system in the area consists of bus services 3/3A (running every 30 minutes), 10A (running every 20 minutes), 936 and 937/937A (running every 30 minutes), all of which stop along the A5 (within the vicinity of the Rising Sun Island), together with train services from Landywood and Cannock (3.75km to 5km from the site).

The existing bus services stopping within the vicinity of the site provide regular links to locations including Cannock, Walsall and Birmingham. Bus services 3/3A travel via Cannock Rail Station, enabling connections to be made with train services running via the station.

The rail stations at Cannock and Landywood are situated on the Birmingham New Street to Rugeley Trent Valley line, which also passes through Bloxwich, Walsall and Hednesford.

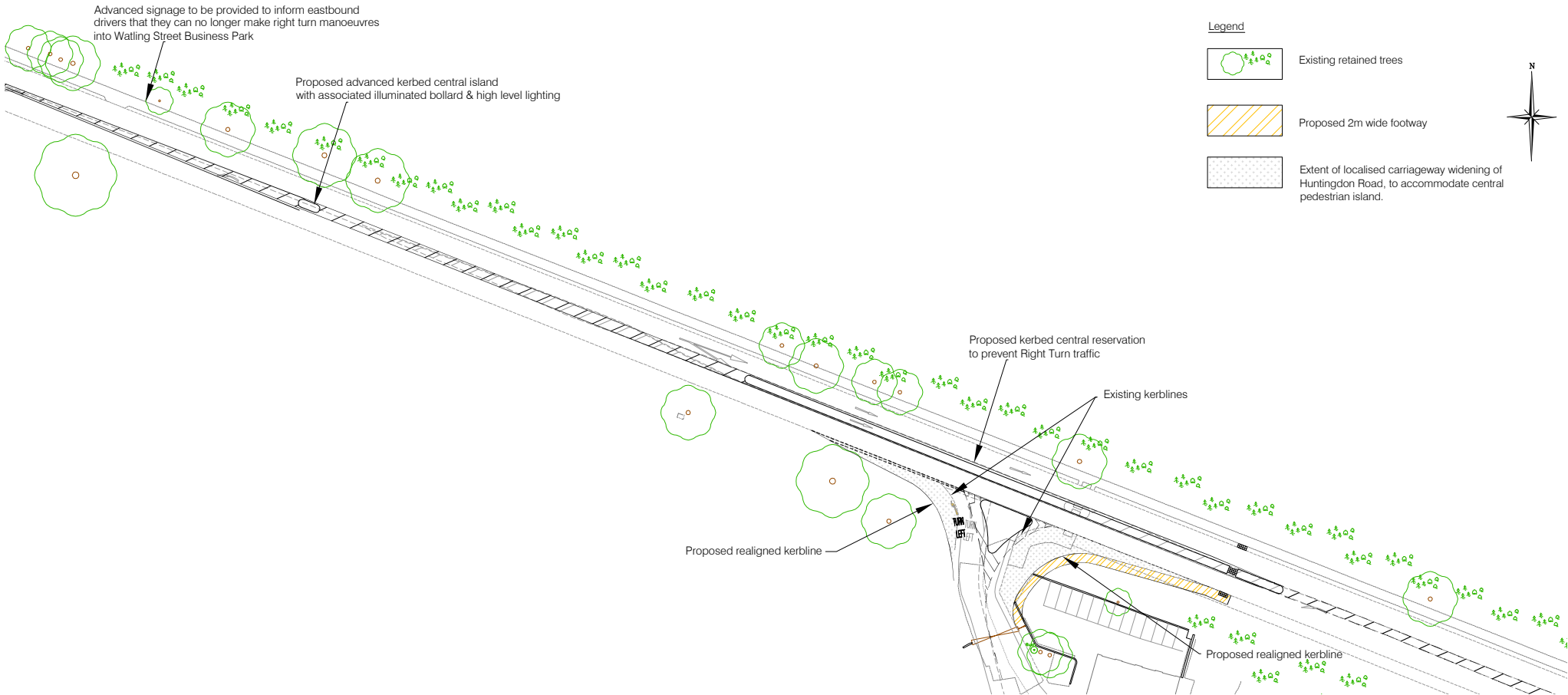
The location of the Watling Street Business Park can therefore offers excellent opportunities for employees and visitors to travel to and from the site by sustainable modes of transport.

### Access Proposals

Following consultation with Highways England (HE), alterations to the access to the site is proposed in a means of left-in, left-out arrangement, is considered to offer the best potential access solution, when taking into account design standards and highway capacity. A preliminary design of the proposed arrangement is shown adjacent.

The proposed left-in, left-out arrangement is based upon alterations to the existing BP access and would meet with the HE 'expressways' concept to improve flows along major A-roads through the increased use of left-in, left-out access arrangements along the routes.

Pedestrian crossing facilities, in the form of a footway on the eastern side of the site access and an uncontrolled crossing point, will also be incorporated into the proposed scheme to aid pedestrians crossing the A5 to the east of the site access.



## Proposed Left-In, Left-Out Arrangement

## 5.0 Highways & Transport

### Trip Generation and Distribution

Vehicle trip generation associated with the proposed extension to the Business Park (assessed on the basis of a 5Ha (approximately 15,000m<sup>2</sup>) floor area extension) has been estimated using both existing traffic generation levels from the Business Park and using survey information from similar developments located across the country.

The vehicular trips generated by the proposed development have been distributed on the local highway network in accordance with existing origin-destination travel to work information for car drivers from the 2011 Census for the Middle Layer Super Output Area (MLSOA) 'Cannock Chase 013', which contains the Watling Street Business Park.

### Capacity Assessment

The results of capacity assessments undertaken at the Business Park access along the A5 demonstrate that the improved junction can accommodate the future traffic generated by the proposed development, and provide sufficient capacity to serve the extended Business Park.

The results of capacity assessments also demonstrate that the proposed development will have an insignificant effect upon the wider highways network.

Based on the capacity assessment results produced, HE has confirmed that additional mitigation measures will not be required at other junctions along the A5 such as Turf Island along strategic highway network.

### Consultation

Due to the location of the Business Park site access, along the A5, HE have been consulted on the proposals throughout the transport work produced to date. Staffordshire County Council (SCC) and Walsall Council (WC) have also been consulted on the scheme as they are responsible for local highway network within the vicinity of the site. SCC have confirmed they have no objections to the proposals based on the work produced to date.

## Further Work

A detailed layout of the proposed left-in, left-out site access arrangement has been drawn up (refer to page 27) and a Stage 1 Road Safety Audit and Non-Motorised User context report produced. This has been assessed and approved by Highways England.

Any subsequent planning application would be accompanied by a comprehensive Transport Assessment (TA) prepared following scoping discussions with HE, SCC and WC. A Framework Travel Plan would also be produced for the whole Business Park site setting out the approaches to be adopted to encourage sustainable modes of transport, helping to mitigate the traffic implications of the proposed development scheme.



# 6.0

## Landscape Character & Visual Resources

The environmental capacity of the potential site has been investigated through both site assessment and desk study.

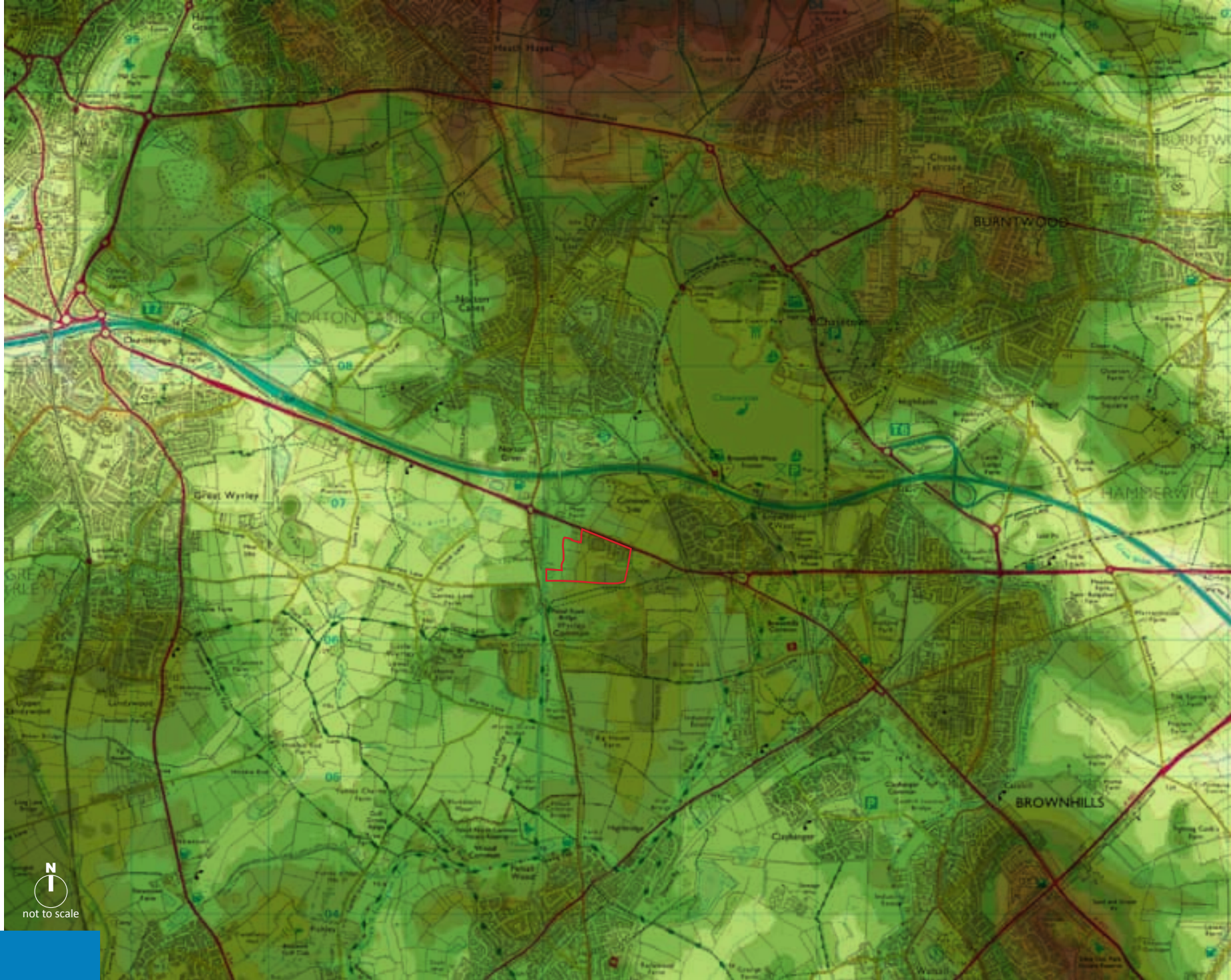
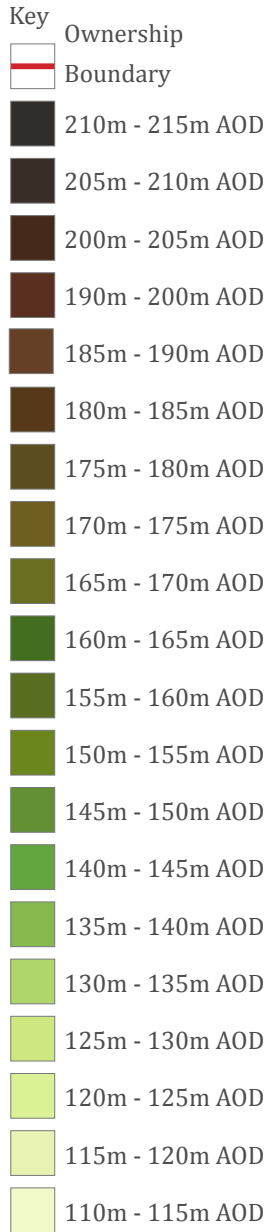
### Topography

The topography of the landscape in the vicinity of the site is relatively flat with gentle slopes within the western part of the site. Land within the site lies at around 155m AOD to 144m AOD, falling to the west. A pond is located within the south eastern part of the existing Business Park. Other localised features include disused basins adjacent to the Cannock Extension Canal.

Topography within the wider landscape is more varied with prominent hills situated at Brownhills (up to 180m AOD at Shire Oak Hill) to the south west, and at Heath Hays (up to 200m AOD) to the north. Other landform include shallow valleys along the watercourses such as Wash Brook and Crane Brook. Another local feature includes Chasewater which is located to the north of the M6 (Toll).



Cannock Extension Canal



## Topography Plan



# 6.0 Landscape Character & Visual Resources

## Visual Amenity

FPCR Environment and Design Ltd have undertaken a Landscape and Visual appraisal of the site. Views of the site from the surrounding landscape are much restricted due to the combined screening effects of existing urban fabric and vegetation cover. Within the vicinity of the site there is an established framework of tree belts and woodlands along with existing buildings situated within the Business Park often restricting local views.

Consequently the site is well screened from both Watling Street and the Cannock Extension Canal. Occasional gaps in the vegetation cover allow views towards the site. However tree belts situated along the perimeter of the existing Business Park and proposed expansion land (Ref Viewpoint 3) prevent views across the site itself.

Views towards the site from the public rights of way network are limited to footpaths situated within fields to the south and east of the site (Ref Viewpoints 1 & 2). Well established tree belts situated along the site's southern perimeter are a prominent feature within these views, and prevent wider views to the north across the site.

There are no other longer distance views towards the site from the wider landscape or surrounding settlements. In summary the site has a very restricted zone of visual influence and could potentially accommodate employment development with minimal harm upon local and more distant views.



## 6.0 Landscape Character & Visual Resources



PHOTO VIEWPOINT 1: View from the public footpath to the west of the site



PHOTO VIEWPOINT 2 View from a public footpath adjacent to Lime Lane



PHOTO VIEWPOINT 3: View from the towpath on the Cannock Extension Canal

# 6.0 Landscape Character & Visual Resources

## Landscape Character

### National Character

At a broad scale the majority of the site lies within Natural England's National Character Area (NCA) No. 67 Cannock Chase and Cank Wood. NCA No. 67 covers a large part of the Birmingham and Black Country conurbation. Consequently the landscape is extremely varied including extensive areas of urban development interspersed with farmland. There are no major rivers within the area but canals are a significant feature and major transport routes also cross the NCA.

With regards to future changes as a result of development within the NCA, this provides opportunities for enhancing both the landscape quality and biodiversity value through green infrastructure.

### County Character

Staffordshire County - Planning for Landscape Change: This Supplementary Planning Guidance was originally prepared to support the Staffordshire and Stoke on Trent Structure Plan 1996-2011. Although this has now been revoked the guidance may inform decisions at a County

level relating to land use and land management. The Landscape Character Assessment places the site within the Coalfields Farmland landscape character type, which are described as *"sparsely wooded landscape of former mining villages and small to medium sized hedged fields on undulating plateaux close to large population centres... This is an area close to, and being pressurised by, the urban fringe, with post war ribbon development and visible adjacent built up areas. Characteristic landscape features: flat landform, mixed arable and pasture farming; heathy pioneer woodlands; commons; medium scale hedged field pattern; hedgerow oaks; well treed brook courses; narrow winding lanes; canal. Incongruous landscape features: Derelict land; busy roads; industrial estates; urban edges; old industrial artefacts.*

*Potential value of new woodland planting. Very high, to maintain a wooded character to the landscape as field patterns decline, to restore areas of derelict land to reflect the character of the surrounding landscapes, and to screen intrusive elements within the landscape."*

### District Character

The Landscape Character Assessment of Cannock Chase District was undertaken to assist Cannock Chase District Council in identifying areas for landscape conservation, improvement or regeneration. The LCA places the site within the Planned Coalfield Farmlands, Landscape Character Type (LCT) within Land Cover Parcel 22e. The Vision Statement for the Planned Coalfields Farmlands includes the following:

*"Any expansion of the industrial land to the south of the A5 should be accompanied by appropriate woodland planting to contain the development and to strengthen the heathy character of the area. A matrix of mixed woodlands, wet grassland, secondary woodland and heathland would unify this area and would contribute to the Biological Enhancement Area Initiative."*

Key

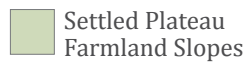


Ownership Boundary

Staffordshire County Council Landscape Character Assessment 1996 - 2011



Coalfield Farmlands

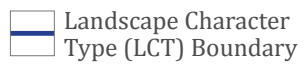


Settled Plateau Farmland Slopes



Sandstone Estatelands

Landscape Character Assessment of Cannock Chase District March 2009



Landscape Character Type (LCT) Boundary

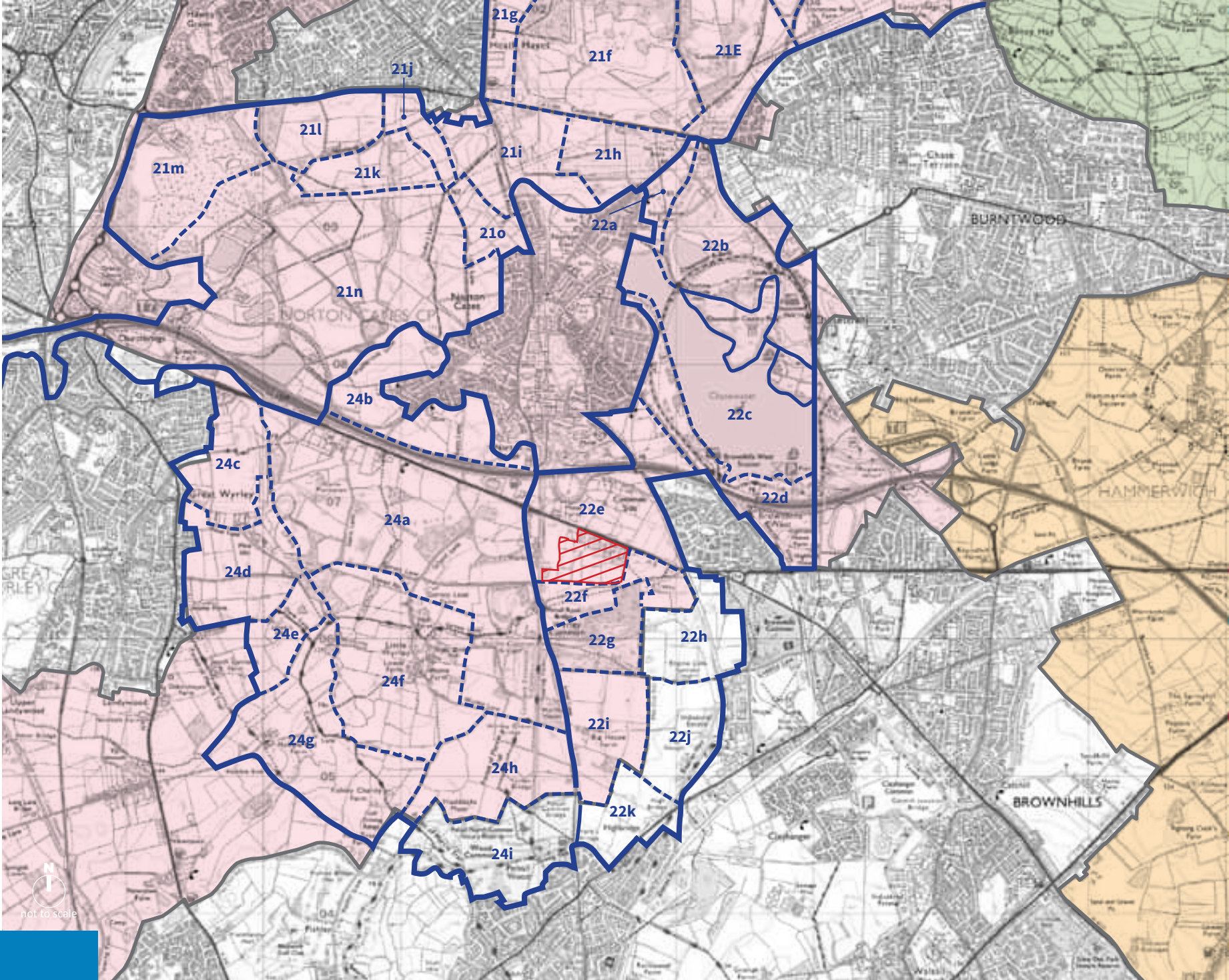
**CP 21:** Planned Coalfield Farmland

**CP 22:** Planned Coalfield Farmland

**CF 24:** Coalfield Farmland



Land Cover Parcel Boundary



Landscape Character

# 7.0 Ecology & Nature Conservation

The site has been subject to a wide range of ecological surveys such that the existing ecological baseline can be fully understood and in turn used to inform emerging development proposals for the site.

## Site Survey

Ecological surveys undertaken during 2016 include an extended Phase 1 Habitat Survey as well as surveys for Badger, birds, Bats, Great Crested Newts, Reptiles and Water Voles.

From these surveys, it is considered that the emerging development proposals for the site can fully retain and indeed enhance the ecological value of the site, ensuring that opportunities for protected and notable faunal species are maximised in the long-term, as set out below.

### Habitats

Habitat surveys of the site have identified the majority of the habitats present to be of negligible ecological value, comprising extensive areas of intensively managed arable land as well as large areas of hardstanding and pre-fabricated buildings which are associated with Watling Street Business Park. The habitats of greater interest within the site include the woodland, mature tree belts and waterbodies within the site, albeit the latter on account of the opportunities they provide faunal species.

### Protected Species

The extensive suite of faunal surveys have identified that the site provides only relatively limited opportunities for protected and notable species. Indeed specific surveys for reptiles, Badgers and Water Voles found no evidence of these species either within the site or its close proximity.

Of note however is the presence of Great Crested Newt breeding ponds outside but within a close proximity of the site. These ponds support a small population of this protected species. Given the proximity of these ponds to the site, and the presence of suitable terrestrial habitats such as woodland and tree belts within the site, it is considered likely that the local Great Crested Newt population will utilise the site for foraging and resting purposes.

Bat activity surveys have identified the woodland, treelines and pond within the site to provide suitable foraging and commuting opportunities to a small range of generally common bat species although activity was generally found to be low. It is noted that similar and improved foraging and commuting opportunities for

bats are present in the local area, where extensive areas of woodland and a wide number of large waterbodies are present.











The treelines and woodland offers suitable nesting and foraging opportunities to a range of bird species.

### Mitigation

The emerging development proposals for the site seek to retain those habitats and features of relatively higher ecological value, with development largely confined to areas of arable habitat which are of very limited intrinsic ecological value. Habitats of relatively higher value within the context of the site, namely the tree belts, woodland, and, to some extent, the on-site waterbody will for the most part be retained post-development, the only loss being a small length of tree belt in the south-west of the site in addition to minor losses for access.

In order to mitigate for any minor losses and indeed to represent an overall enhancement to the habitats within the site, emerging proposal will include areas of new habitat creation. This will include new structural planting to bolster existing hedgerows and to extend

Key

-  Ownership Boundary
-  Arable
-  Woodland/Trees
-  Field Margins and Ruderal Vegetation
-  Tree Belt
-  Building
-  Hardstanding
-  Waterbody
-  Trees with Bat Roost Potential
-  Waterbody with GCN present



Ecological Features Plan

## 7.0 Ecology & Nature Conservation

areas of woodland as well as the delivery of new habitats in the form of wet grassland and ephemeral waterbodies provided within the proposed detention basins and swales. Habitat connectivity within the wider area will be retained and strengthened, with the bolster planting of the tree belts particularly along the southern boundary, enhancing connections between areas of woodland to the east and west of the site.

Opportunities to create habitats for protected species will be increased through the implementation of the proposed landscaping measures which will provide enhancements to the sites value for:

**Bats.** Providing stronger commuting and foraging corridors and increased areas of suitable foraging habitat within greenspace and planted areas. Roosting opportunities will be provided through the installation of a number of bat boxes on suitable retained trees. The vast majority of existing trees noted to be of potential value to roosting bats are to be safeguarded as part of the development proposals.

**Amphibians (Great Crested Newts).** The delivery of new wetland features within the site will offer potential new breeding opportunities for the local GCN population, whilst new areas of wet meadow grassland as well as new structural planting in the form of woodland and hedgerows will provide enhance foraging and hibernating opportunities for this faunal group.

**Birds.** The retention of existing nesting habitats as well as the provision of additional areas of native structural planting and public open space will provide opportunities for nesting and foraging birds within the site. Further opportunities for enhancement may include for the inclusion of a range of berry bearing shrubs in the planting scheme for the site, in addition to the provision of a range of nesting boxes which could be situated on trees or buildings within the site.

### Designated Sites

A small number of statutory designated sites are also located within a close proximity of the site. Those designated at the European / International level

(including any underpinning Site of Special Scientific Interest) are discussed in more detail in the European Sites section over the page.

In addition to those Sites of Special Scientific Interest (SSSI) further designated at the European level, Chasewater and the Southern Staffordshire Coalfield Heaths SSSI is also situated within the locality of the site. On the basis that the emerging scheme seeks to deliver employment infrastructure and that this SSSI is separated from the site by areas of open countryside, it is not considered that there are any potential impacts which would give rise to any significant adverse impacts on these sites, either directly or indirectly, as a result of the development proposals.

The site lies directly adjacent to the A5 (Rough Grassland South of) Retained Grade 1 Site of Biological Importance (SBI), which is designated on account of its grassland habitat. The emerging development proposals will avoid any direct impacts on this SBI. Moreover, the implementation of standard engineering protocols and best practise during construction will be sufficient to

avoid any significant indirect impacts upon this SBI during construction. Given that the emerging scheme would be for employment use, it is not considered that development proposals would result in an increase in recreational pressure on adjacent land during the operational phase of development.

Given the separation of the site from any other non-statutory sites it is not considered that any significant adverse impacts would result from the emerging development proposals.

### **European Sites (Cannock Chase SAC and Cannock Extension Canal SAC & SSSI)**

The site lies within a close proximity of two European Designated sites, Cannock Extension Canal Special Area of Conservation (SAC), which lies to the west of the site boundary, and Cannock Chase SAC, which lies approximately 7.5km to the north-west. Each of these European sites are also afforded SSSI designations. Given the proximity of these European sites, specific consideration has been given to the potential for adverse impacts to result from the emerging development proposals.

Careful consideration will be given to the reasons for designation of the European sites (including their underpinning SSSI's), the Conservation Objectives for these sites, and the potential routes by which the emerging development proposals could result in significant effects on the SAC.

Subject to further HRA assessment works, it is likely that in respect of Cannock Extension Canal SAC/SSSI, a suite of mitigation and avoidance measures would be proposed in order to ensure that significant adverse impacts are avoided.

In respect of Cannock Chase SAC/SSSI, given the separation of this European Site from the proposed scheme (7.5km distance), and that the scheme is not residential in nature there would not be any requirement for additional avoidance or mitigation measures to ensure that adverse impacts are avoided.

Chasewater and the Southern Staffordshire Coalfield Heaths Site of Special Scientific Interest (SSSI) is also situated within the locality of the site. Again given that the emerging scheme seeks to deliver employment

infrastructure and that this designated site is separated from the site by areas of open countryside, it is not considered there is potential impacts for any significant adverse impacts on these sites, either directly or indirectly, as a result of the emerging development proposals.

### **Summary**

In light of the survey work and assessment undertaken at the site, and subject to future works, the emerging development proposals would not result in any significant adverse impacts on biodiversity. The proposals will realise opportunities to deliver a range of ecological enhancements at the site through retaining and enhancing those features of relatively greater ecological value and moreover delivering new semi-natural habitats which will in turn provide improved opportunities to a faunal species. Appropriate measures are proposed to ensure that potential adverse impacts on European designated sites may be fully avoided and mitigated for as part of the emerging development proposals.



# 7.0

## Ecology & Nature Conservation


### Arboriculture


FPCR have undertaken an arboricultural appraisal of the site. Tree cover across the site was mostly found in groups of trees forming the field parcel boundaries. There were several individual trees located either within the tree groups or within a field parcel which had been assessed separately due to the size and/or species compared to the surrounding tree cover. There were also two woodland parcels of varying qualities adjacent to the canal on the western boundary.


English Oak was the primary species for the individual trees but also was consistently found forming the tree groups along with species including ash, and smaller forms of Hazel, Hawthorn and Holly. The majority of the tree cover throughout the site was assessed as mature in age and having moderate quality.


The vast majority of trees and hedgerows can be retained within an enhanced green infrastructure framework and supplemented with additional belts of tree planting.

**Key**


 Category U - Trees / Groups Unsuitable for Retention (BS 5837:2012)

 Category A - Trees / Groups of High Quality (BS 5837:2012)

 Category B - Trees / Groups of Moderate Quality (BS 5837:2012)

 Category C - Trees / Groups of Low Quality (BS 5837:2012)

 Root Protection Area (The RPA has been altered where appropriate to reflect underground constraints)

 Individual / Group Number and BS5837:2012 Category

 Indicative Shade Pattern (in accordance with BS5837:2012 where appropriate)



**Tree Survey**

# 8.0 Heritage

The area immediately surrounding the proposed development has been examined to assess the nature of the surrounding heritage sites, and to place these sites within their archaeological and historic context.

## Historic Context

The sources consulted were:

- Staffordshire Historic Environment Record (HER);
- Historic England and Local Planning Authority for designated sites;
- Historic mapping (available online); and
- Historic aerial photographs available on Google Earth.

An approximate study area of 500m around the proposed development has been examined to assess the cultural heritage potential within the site itself and the surrounding area. This assessment does not attempt to plot and review every archaeological find and monument, rather it aims to examine the distribution of evidence and to use this to predict the archaeological potential of the study area and the likely significance of the development proposals on those remains.

There are no World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Registered Battlefields or Conservation Areas within the 500m study area. The closest listed building to the proposed development is located approximately 1.4km to the south west. It is anticipated that there will be no, or negligible effects upon these setting of these designated assets.

There are assets of prehistoric, early medieval and medieval date recorded within the study area.

There is one asset of Roman date recorded within the study area. The course of Watling Street Roman road (01140) is followed by the modern A5 and forms the northern boundary of the site.

There is one asset of post-medieval date recorded within the study area. Earthworks suggestive of ridge and furrow or later drainage features identified from aerial photography (53475) are located to the south

east of the proposed development but outside the site. The Industrial period is the best represented period, as 16 assets of this date have been recorded within the study area. The majority of these assets relate to industrial activities which exploited the landscape of the study area. There are two collieries recorded within the study area; Brownhills Colliery and Conduit Colliery. There are three pits associated with Brownhills Colliery (20450, 53913 & 20512) recorded within the study area along with a former colliery building (53473). The extent of Conduit Colliery extends into the proposed development but this is where buildings are currently located (53470).

The increased industrial activity within the landscape led to an increase in the transportation networks, which grew in order to move goods and materials around the country. The Cannock extension of the Wyrley and Essington Canal (02225) extends to the west of the site and the location of a double canal basin (53471) associated with the canal is located immediately adjacent to

the western boundary of the site. In addition to the canal, there are also the routes of a number of former railways and tramways which cross the study area. The route of the Norton Branch Extension of the London and North Western Railway (20508) passes to the east of the study area and has been dismantled. There are also a number of mineral railways tramways recorded within the study area which linked the colliery pits with the main transportation of the canal and railway (53462, 53472, 53474 & 53914). The route of one of these former tramways (53472) extends through the proposed development.

The remaining assets of Industrial date are the location of three farms (57114, 57115 & 57111) and the route of a late 19th century turnpike road (58509) which follows the course of the Roman and modern road.

The historic landscape character and historic environment character of the proposed development is

a mixture of landscapes and an industrial complex. A small area of plantation is also located within the proposed development.

The 1884 Ordnance Survey (OS) map (Staffordshire, 1:2,500) shows the majority of the proposed development as a series of open fields. Conduit Colliery (53470) is shown as a series of pits and shafts, as well as miscellaneous buildings. The route of the tramway (53472) linking the colliery to the canal is also marked. Brownhills Colliery is shown immediately to the east of the proposed development. There is little change to the proposed development shown on historic maps until the 1902 map which shows Conduit Colliery as a series of old pits and shafts. The tramway is no longer shown. The 1938 map shows the site as a series of fields. A small works and garage are noted to the north of the proposed development on the 1961 map.

# 8.0 Heritage

## Archaeological/Heritage Potential and Constraints

There are two assets recorded within the proposed development, Conduit Colliery (53470) and a tramway (53472), both of which date to the Industrial period. The route of the tramway (53472) is visible on current aerial photography which suggests there is the potential for sub-surface remains to survive. Although it is currently unknown how the foundations of the proposed development will be constructed on the site laid out, it is possible that it will have a negative effect upon any remains of the tramway, as well as any previously unrecorded archaeological remains.

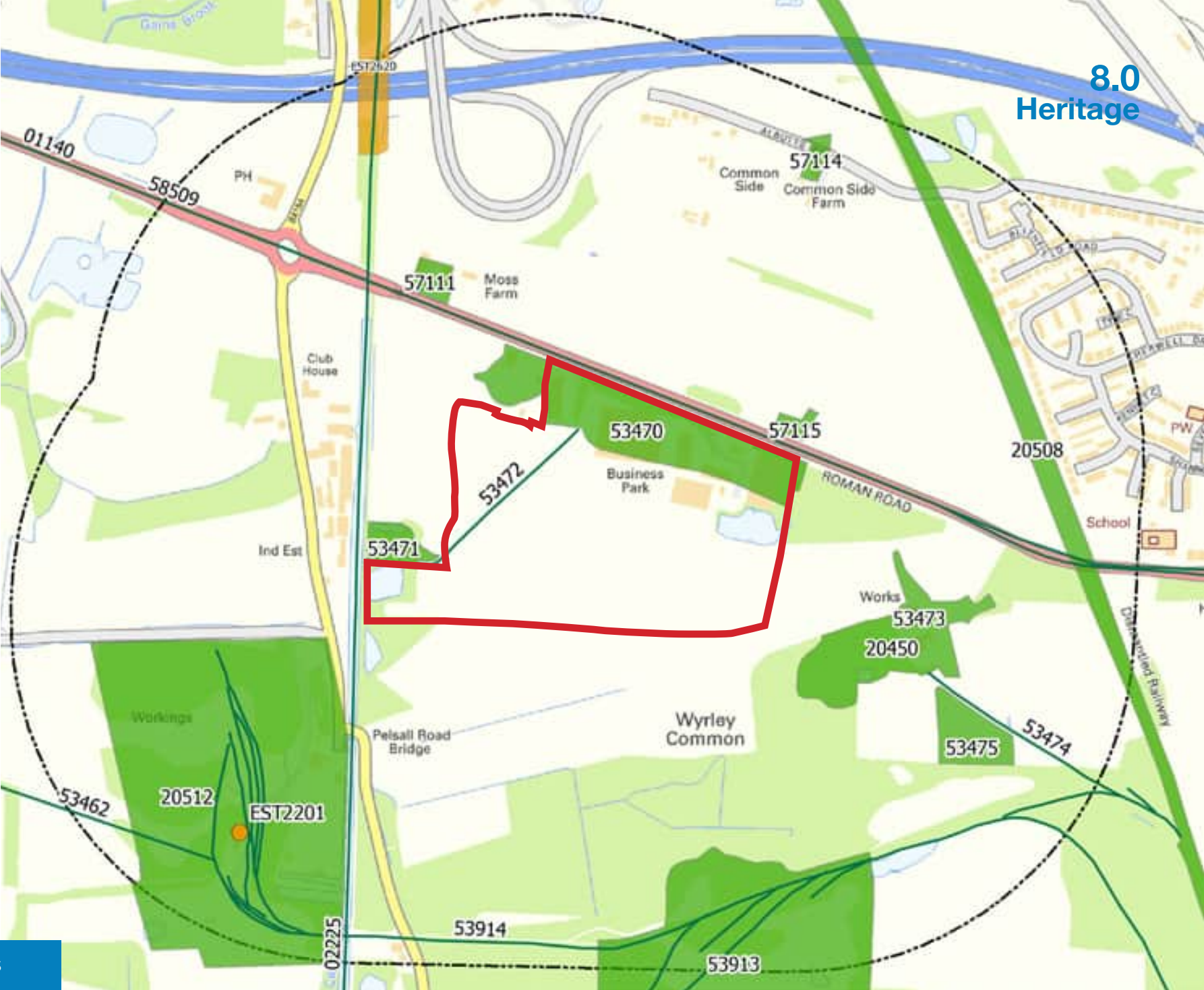
As part of the mitigation and during the initial construction phases of the development, topsoil strip could be monitored by a qualified archaeologist. This will further inform the archaeological potential of the proposed development as well as informing the requirement for any further intrusive archaeological work. This should also be undertaken in consultation with the Local Planning Authority Archaeologist.

Although there is potential for some archaeology within the proposed site the potential and nature of any archaeological remains are unlikely to prevent development.

### Summary

Development of the site will have no material impact upon any identified built heritage assets.

- Key
- Ownership Boundary
  - Study Area
  - Recorded Heritage Assets
  - Recorded Heritage Assets
  - Events
  - Events



Recorded Heritage Assets

# 9.0 Flood Risk & Drainage

This Flood Risk and Drainage Strategy has been prepared to give initial guidance to the baseline scenario regarding flood risk and drainage strategy at this site.

## Introduction

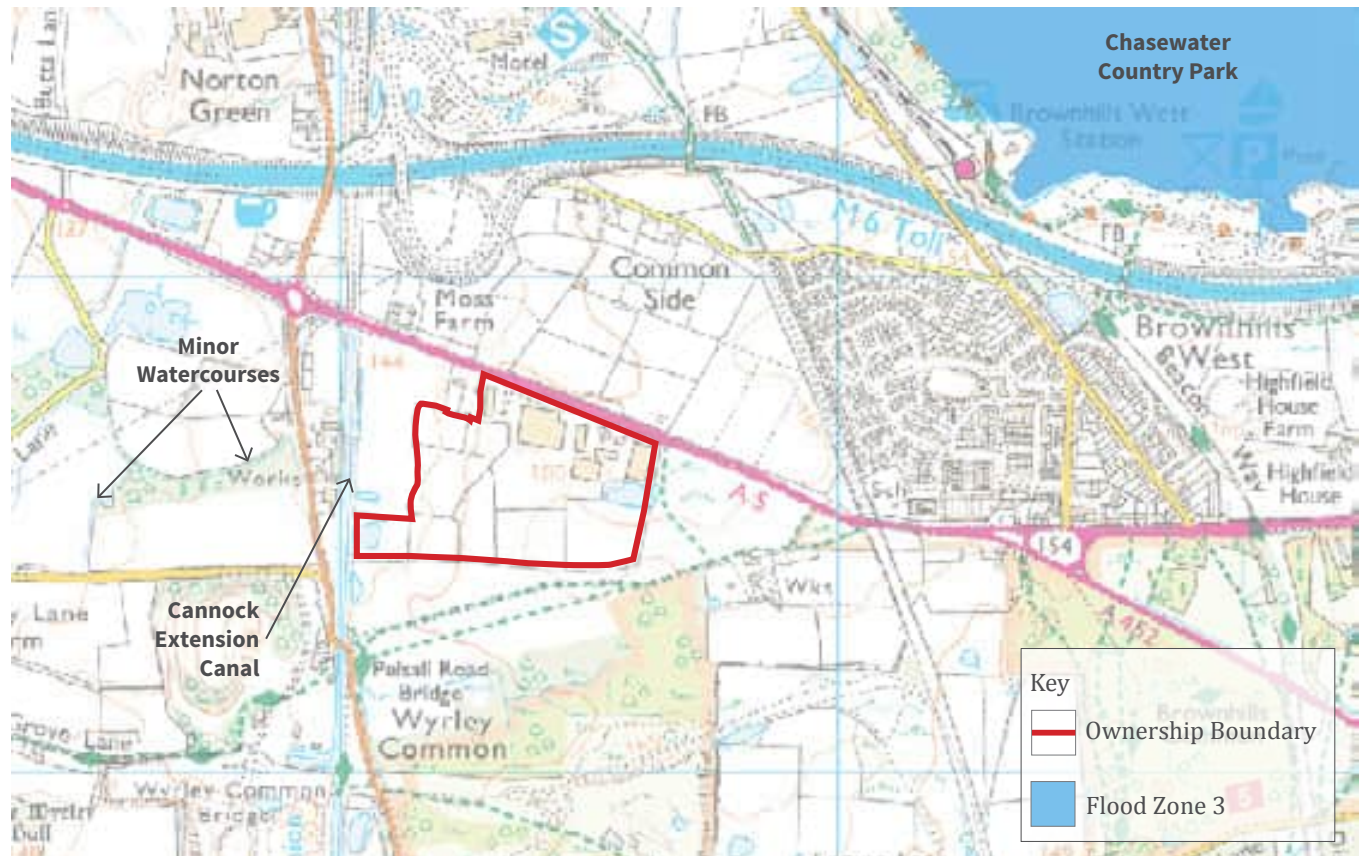
This section assesses the flooding potential at the site and also proposed and also proposed drainage strategy.

## Definition of the Flood Hazard and Probability

### Fluvial Flood Risk

The site is remote from any Main Rivers or substantial ordinary watercourses.

There are two minor watercourses indicated to be present to the west of the site beyond Lime Lane. The Environment Agency Flood Map indicates that the site is not at risk of flooding from these minor watercourses or any Main Rivers.

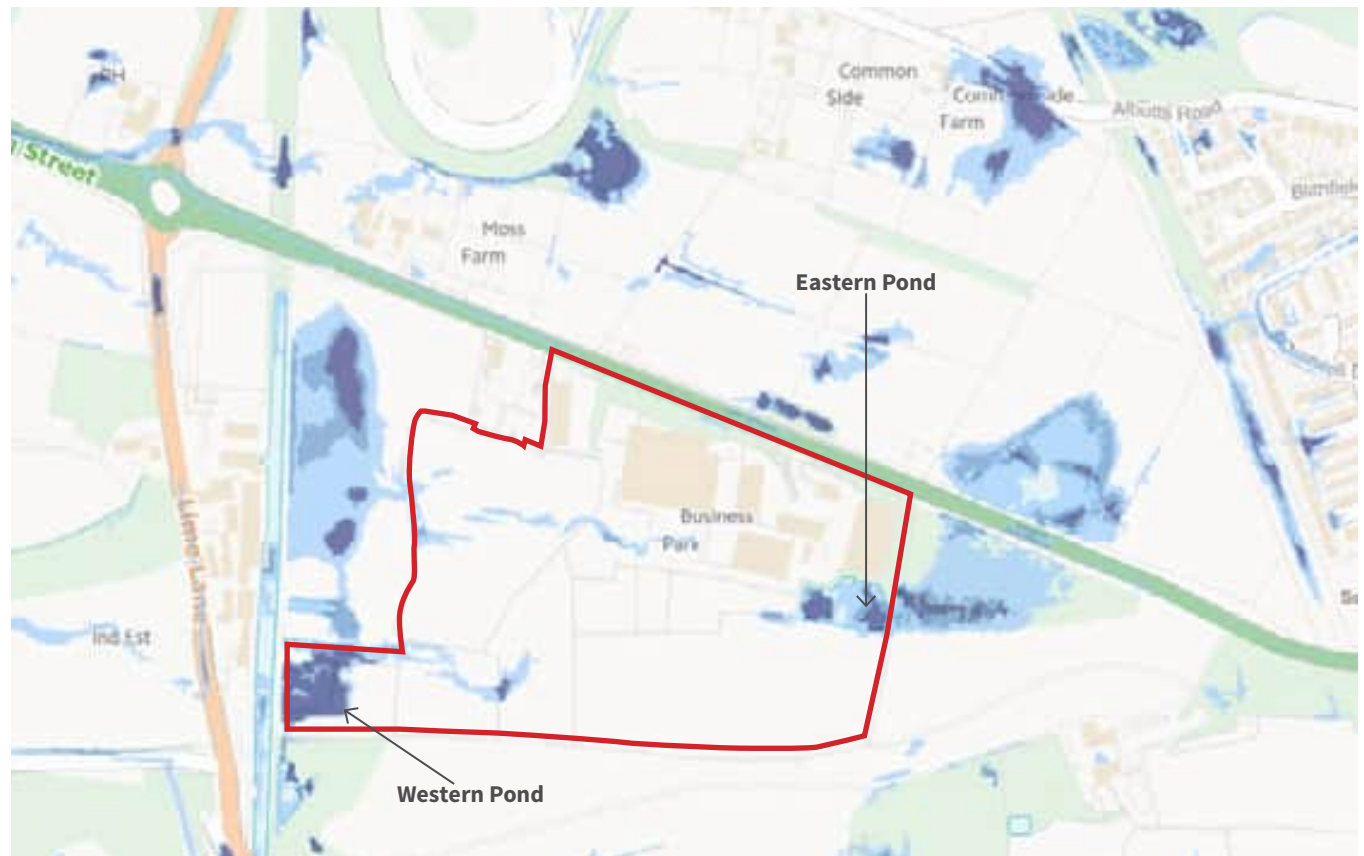


Environment Agency Flood Map

## Surface Water (Pluvial) Flood Risk

The undeveloped areas of the site lie in an open arable farming area which has steady falls. The undeveloped site falls from east to west in line with the general topography of the locality. The Gov.UK Surface Water Flood Mapping included above as Figure 1.1 indicates that the site is generally at very low risk of surface water flooding. The potential for surface water flooding is indicated at the existing surface water drainage pond at the east of the existing Business Park and at the pond to the east of the canal.

The development areas (extension of the Business Park) is not at significant risk of flooding from surface water runoff from adjacent land.





# 9.0 Flood Risk & Drainage

## Flood Risk from Ground Water

A desktop search has been undertaken for this site, demonstrating it to be underlain by the following geology. Superficial deposits - "Till, Devensian – Diamicton" and Bedrock - "Pennine Middle Coal Measures Formation - Mudstone, Siltstone and Sandstone." The superficial and bedrock deposits are likely to have low permeability.

The site is generally free from any standing water or boggy ground. The only exceptions being at the extreme east and west of the site around the existing ponds.

It is therefore confirmed that the site is not at significant risk of flooding from ground water.

## Flood Risk from Sewers and Infrastructure

There are no adopted sewers indicated to cross the site or to lie within close proximity of the site.

The Gov.UK flood risk mapping indicates that the site does not lie in an area that is at risk of flooding from reservoirs. The site is not within close proximity of any wet process industrial works.

The Cannock Extension Canal that lies to the west of the site lies at a lower level than all but the extreme west of the site. The water levels in the canal are regulated and do not present a significant source of flood risk to the site.

The sewers and infrastructure flood risk source can therefore be discounted as a significant source of flood risk to the site.

## Flood Hazard and Probability Conclusions

The site lies in the low risk Flood Zone 1 where the risk of flooding from all of the above potential sources of flood risk is considered to be low and less than 1 in 1000 in any year.

## Flood Risk and Sustainable Drainage Strategy

The proposals are for the construction of an extension to the existing Business Park. In accordance with the NPPF, the proposed business use falls under the less vulnerable category.

The technical guidance to the NPPF states that all forms of development are appropriate within Flood Zone 1.

## Sustainable Drainage Proposals

The site is understood to be underlain by superficial deposits and bedrock with a low permeability. From this desktop assessment of the site's geology it is assessed that there is a low potential for the use of infiltration SuDS at the site.

It is noted that the surface water drainage from the existing Business Park drains to the pond to the east of the site. This is via a piped system. The existing drained Business Park areas are higher and can drain towards the east under gravity. The undeveloped areas of the proposed Business Park fall towards the west, other than at the initial interface with the existing eastern pond. The majority of the undeveloped areas of the site fall towards the existing pond to the east of the canal.

The strategy for the drainage of the Business Park extension are in accordance with the hierarchy for surface water disposal as set out in Part H of the Building Regulations. This hierarchy notes that surface water should be drained by infiltration. Where this is not practicable it should be drained to a watercourse or

waterbody. Where neither of the above are practicable, discharge should be made to a sewer.

### Infiltration Drainage

If viable surface water would be drained to ground in line with best practice. In this case the potential for surface water drainage to ground by infiltration appears to be low. The viability of the use of infiltration drainage would be investigated further by way of an intrusive site investigation at the detailed design stage.

### Drainage to a Watercourse or Waterbody

The existing pond to the west of the site is below the lowest level of the site and appears to be sufficiently deep to be able to be utilised as a surface water outfall from the site. This pond was noted to be predominantly dry at the time of the site visit with a standing water below the level of the adjacent canal. Water drains from the pond under the canal to the minor watercourses to the west of the canal.

This pond would therefore provide a viable outfall for surface water from the site.

### Proposed Outline SuDS Surface Water Drainage Strategy

It is proposed that the impermeable areas of the developed site will be drained to the existing pond to the west of the site at an attenuated rate. The site divides into two key catchments to the north west and south west. The greenfield runoff rate from these site areas has been assessed in accordance with the ICOP for SuDS. The resulting mean annual greenfield runoff rates (QBAR RURAL), based on a low permeability soil value of 0.45, are 8.2 l/s and 15.8 l/s respectively.

It is proposed that the surface water discharge is limited to the mean annual greenfield runoff rates and water flows will be restricted back to these rates in all storms up to and including the critical duration 1:100 year plus 40% climate change rainfall event.

## 9.0 Flood Risk & Drainage

The Business Park will be served by a privately managed SuDS surface water drainage systems. Two open detention basins are proposed as SuDS site control. The detention basins would offer water quality improvements and provide final site control to limit off site flows to the allowable discharge limit.

The impermeable area of the proposed development has been assessed on the basis of a typical 95% impermeability from the two development catchment site areas.

Microdrainage source control calculations have been undertaken based on the allowable discharge rates and attenuating flows from the peak 1:100 year plus 40% climate change rainfall event. Two shallow dry basins are proposed at this feasibility stage. These ponds would be located along the low western side of the site.

The final form of the SuDS to be incorporated in this scheme, to give the necessary water quality improvements, will be developed as the scheme design progresses.

### Foul Water

There are no adopted foul water sewers in local area of the site. The closest adopted foul sewer lies circa 900m to the east of the site along the A5. The existing foul sewerage is drained via gravity to cess pits which are served by tankers.

A discharge of foul water from the proposed development to the adopted sewers via a new pumped connection or an extension to the existing cess pit arrangement is proposed.

## Recommendations

The following recommendations are made to mitigate any flood risk and promote a sustainable and practicable drainage strategy at the proposed development:

If, as suspected, infiltration drainage proves not to be viable the proposed development surface water discharge will be limited to the peak mean annual greenfield runoff rate for all storms up to and including the 1 in 100 year plus 40% climate change event, prior to discharge to the adjacent existing pond to the west of the site. Two open detention basin have been modelled at this stage to demonstrate the viability of this option.

Foul water drainage from the proposed development will be drained to the offsite adopted foul sewer via a new pumped connection or by an extension to the existing cess pit arrangement, subject to further discussion with Severn Trent Water.

# 10.0 Noise

A noise assessment of the site proposed for employment (B1/B2/B8) development has been undertaken.

## Introduction

The noise impacts of the proposed development upon the existing residents near to the site have been considered.

## Site Description

The site is located approximately 2km east of Cannock town centre on the southern side of the A5 Watling Street at Norton Canes. The site is currently open fields to the south and west of the existing Business Park.

The existing Business Park forms the majority of the northern site boundary. Beyond the Business Park to the north is the A5 Watling Street which is a traffic route between Tamworth and the M42 to the east and Cannock and the M6 to the west. Land use beyond the A5 is primarily open fields but with the M6 Toll Road beyond at a distance of approximately 300 metres.

The western site boundary is formed by open fields and the Cannock Extension Canal which has a number of boat moorings. Beyond the canal is Yates Industrial Estate which comprises a number of commercial

operations including roofing supplies, service station, vehicle maintenance and a sports and recreation club. The remaining site boundaries to the south and east are formed by open land.

The nearest sensitive residents are considered to be canal boat residents on the Cannock Extension Canal



Aerial view of the site and surroundings

## Basis Of Assessment

In the absence of specific guidance for assessment of environmental noise within the NPPF and the DEFRA Noise Policy Statement for England (NPSfE), it is considered appropriate to base this assessment on current British Standards and appropriate local or national guidance.

BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' is the current British Standard providing guidance for acoustic requirements within buildings. The Standard advises appropriate criteria and limits for different building types including dwelling.

BS4142:2014 'Methods for rating and assessing industrial and commercial sound' is the current British Standard providing guidance for assessment of noise impact from industrial and commercial sites. In general, the likelihood of adverse impact for a particular noise is dependent upon factors including the margin by which it exceeds the background noise level, the character of the noise and its occurrence.

## Measurements

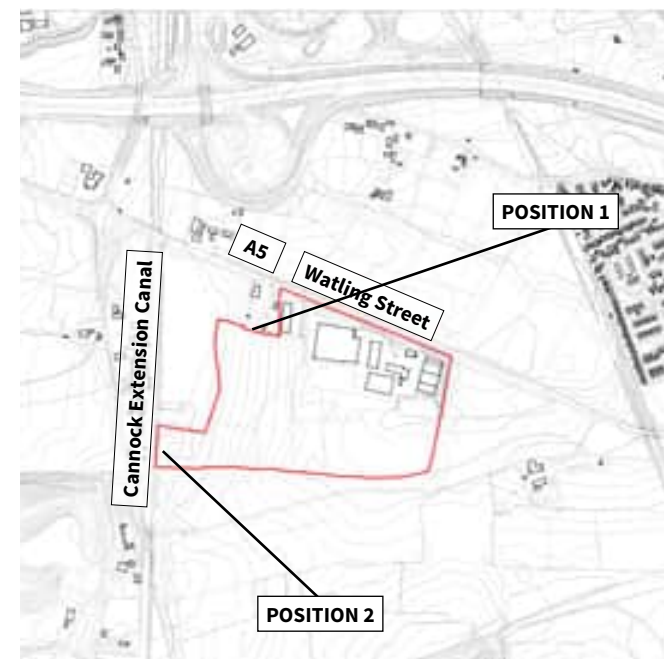
Measurements have been made to determine the existing noise climate at the site. Survey work was carried out over five consecutive days and comprised of two monitoring positions located adjacent to the north and western boundaries. All measurements were made with calibrated, precision grade sound level meters in accordance with BS EN 60651 and BS 7445:1993. The measurement locations are marked on the site plan opposite.

## Results

The results of all diurnal site measurements indicate that there is a high level of background noise at the site attributable to traffic flows on the A5 and M6 Toll Road to the north of the site.

Position 1 – Northern Perimeter: Sample levels ranged between LAeq(15min) 70.7dB during the daytime and LAeq(15min) 42.4dB during the night time. Results showed a mean daytime level of LAeq,16hr 58.0dB and a mean night time level of LAeq,8hr 53.9dB.

Position 2 – Western Perimeter: Sample levels ranged between LAeq(5min) 67.9dB during the daytime and LAeq(5min) 33.4dB during the night time. Results showed a mean daytime level of LAeq,16hr 50.8dB and a mean night time level of LAeq,8hr 45.0dB.



# 10.0 Noise

## Noise Impact

Mechanical services plant: BS 4142 advises that, where the Rating Level for new plant installations is at or below the background sound level at the nearest noise sensitive receptor, the noise would have a 'low impact'. The lowest LA90 values measured over during the survey have been used as the basis of the assessment.

Break-out from employment buildings: For new industrial/commercial units, it would be reasonable to expect internal operational noise levels to comply with the Noise at Work Regulations which stipulate a first action level of 80dB(A). For an internal level of 80dB(A), the break-out sound level just outside the building would be 49dB(A). It is noted that this level is slightly lower than existing daytime ambient sound levels at this location.

The assumed internal operational sound level is representative of heavy industrial activity. Where the unit is used for warehouse or light industrial activity, internal operational sound levels would be expected to be significantly lower with a consequent reduction in noise levels at the moorings. In this instance, it is probable that 'low impact' conditions would be achieved for both daytime and night time.

Noise levels at the moorings could be reduced by site location and orientation of buildings and/or an acoustic fence/wall for the elevation facing the canal. Such measures would enable a condition of 'low impact' to be achieved at all times of the day and night.

### Vehicle movement

Access into the new development will be through the existing Business Park, with appropriate screening of vehicle activity from the canal moorings by employment buildings nearest to the canal. If service yards are entirely screened from the nearest moorings by a large employment building, the expected screening effect would be of the order of 15dB. Consequently, it is considered that several vehicle movements could occur during the day and night whilst maintaining the BS 4142 'low impact' assessment at the canal moorings.

## Conclusions

Measurements and observations made at this site indicate that the noise climate primarily is determined by traffic flows on the A5 and M6 Toll Road located north of the site. This noise is significant throughout the day and night.

Limit noise levels have been derived for all mechanical services plant at the development site which would enable acceptable conditions in accordance with BS 4142 and BS 8233 at the canal moorings.

Assessment of the noise impact from employment buildings and from vehicle activity on the proposed development site indicate that acceptable conditions in accordance with BS 4142 and BS 8233 can be achieved at the canal moorings with careful design of the buildings and site layout adjacent to the canal boundary.

It is considered that the proposed development can be designed such that it will not result in any significant increase in noise or loss of amenity at the residential canal moorings.



# 11.0 Site Delivery

The site has no substantive environmental constraints, and it's development provides a range of opportunities.

## Services

The site lies immediately to the south of the A5 Watling Street. This road is a major highway with significant services running within the road corridor.

The desk top assessment indicates that there is a 315mm medium pressure gas operating at MP270 in the southern verge which has ample spare capacity to service the proposed development.

Similarly, there is a STW water main in the verge which STW advise will have adequate capacity to serve the site.

Reinforcement of the electricity network in the area is likely to be required. An assessment is currently underway to assess the cost and delivery of the upgrade.

Extensive telecommunications infrastructure is available in the A5 Watling Street directly to the north of the site. The existing development is connected to the services in the road and the new development will connect into the same service runs.
















## Technical Assessments

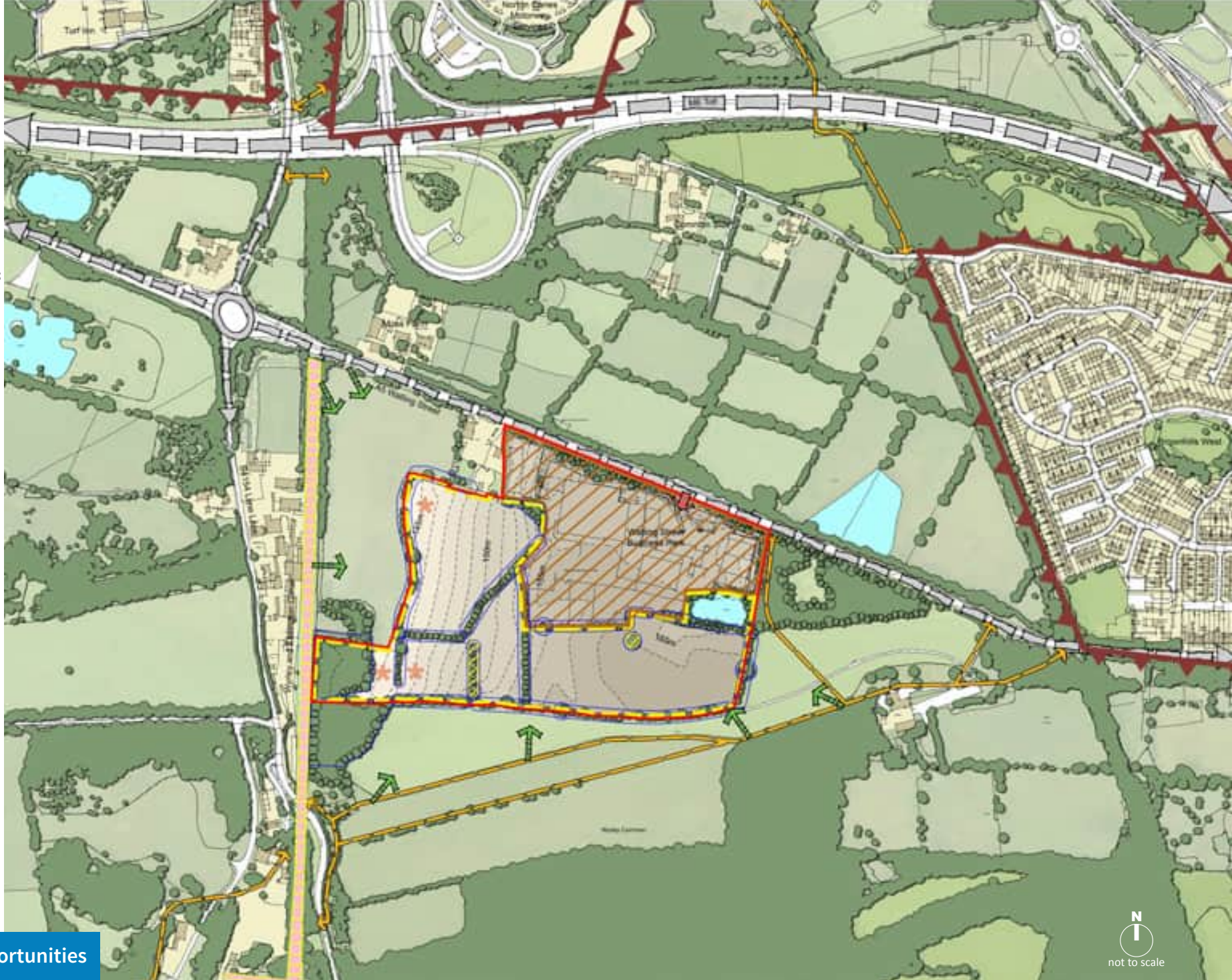
A considerable amount of technical work has been undertaken which demonstrates the suitability and deliverability of the site, which is summarised below. This work is, however, on going and is likely to be supplemented by further work, for example, relating to ecology and air quality.

The site has no substantive environmental constraints, and it's development provides a range of opportunities:

- The expansion land includes a total of 5.45Ha to accommodate B1, B2 and B8 use development.
- Highly desirable location for employment development, conveniently utilising the existing access to the Business Park from the A5, and within close proximity to the M6 (Toll).
- A sustainable location situated immediately adjacent to the existing Business Park, within walking / cycling distance of nearby settlements and existing bus stops on the A5.

- The site can be developed with minimal disruption to existing business operators.
- The existing hedgerows and tree belts can be supplemented with additional belts of woodland in accordance for the Districts vision for the local landscape character area. Employment use development can be accommodated with minimal harm upon local views.
- Sustainable Urban Drainage (SUDs) collect surface water run-off and to enhance biodiversity.
- Noise and air quality impacts can all be accommodated.

-  Ownership Boundary
-  Proposed Employment Site
-  Existing Trees, Hedgerows and Vegetation
-  Root Protection Areas (RPA)
-  Trees to be removed
-  Existing Roads
-  Existing Public Right of Way
-  Key Views
-  Existing Contours
-  Existing Pond
-  Indicative SuDS Attenuation Basin Locations
-  Site of Special Scientific Interest (SSSI) & Special Area of Conservation (SAC)
-  Green Belt
-  Watling Street Business Park
-  Existing Point of Access to Business Park



## Constraints and Opportunities

# 11.0 Site Delivery

## Development Framework

In summary the amount of development proposed within the site is as follows:


### Employment Development

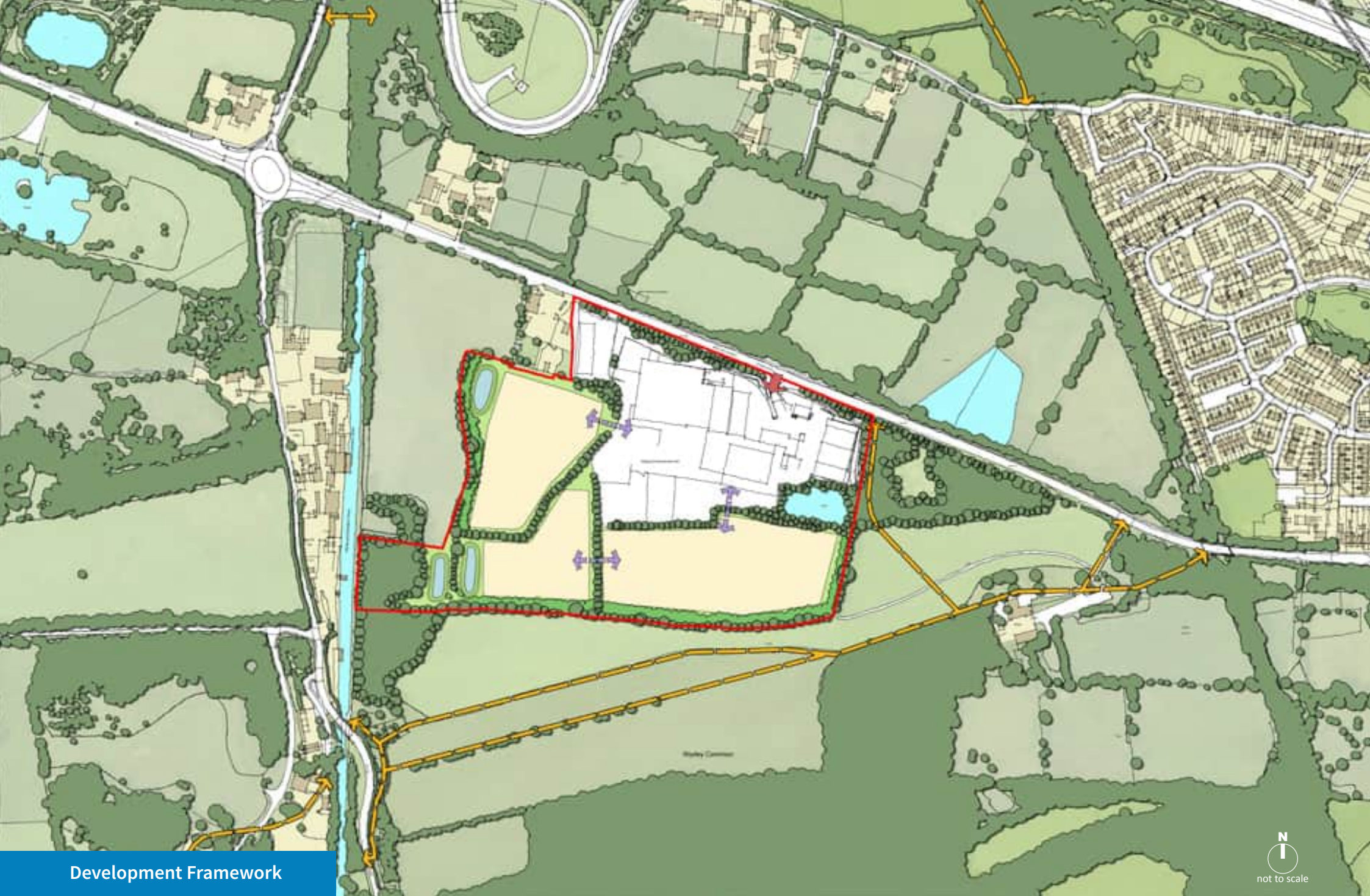
The expansion land includes a total of 5.45Ha proposed employment development to comprise B1, B2 and B8 uses. It is envisaged that an additional 15,000 square metres (gross external floor area) of B Class can be accommodated. The existing access into Watling Street Business Park would be utilised and improved as required to serve the proposed development.

### Green Infrastructure

The Green Infrastructure (GI) includes a robust framework of tree belts and hedgerows which will be retained and enhanced by additional new belts of woodland. SuDS ponds can be accommodated on the lower lying areas of ground within a multi-functional GI.

#### Key

-  Ownership Boundary
-  Development Area 5.45Ha
-  Existing Point of Access to Business Park
-  Proposed Point of Access to Development Areas
-  Existing Public Rights of Way
-  Existing Hedgerow, Tree and Vegetation to be Retained
-  Proposed Structural Planting  
Woodland, hedgerows and tree cover
-  Green Infrastructure 4.2Ha  
Includes new woodland, hedgerows, tree planting, grassland, SuDS wetland habitats, mounding and informal open space. Includes retained vegetation, trees and hedgerows
-  Swales and Detention Basin



# 11.0

## Site Delivery

### Delivery

The Watling Street site has been identified as an area of land exceptionally well suited to an extension of the existing employment site. 5.45Ha of land to the west and south of the existing Business Park is an available, suitable and achievable site that benefits from the existing infrastructure serving the Business Park, and is well located within the A5 corridor being a principal focus for employment market requirements.

This site is available now and could be developed for B1, B2 and B8 use development within 1-5 years, therefore contributing towards the employment needs of the District within the current plan period.

The site is wholly controlled by St Modwen who own the adjacent Business Park and wish to develop the site immediately, being confident of the site's market attractiveness, with there being significant market demand for modern, high quality commercial units in this area.



Aerial view from the west

# Watling Street, Cannock

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# Vision Document

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March 2017