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Jones Lang LaSalle Incorporated

Black Country Core Strategy Review

Development Prospectus to support Call for Sites response

Nurton Developments (Hilton) Ltd – Hilton Park, Junction 11 – A Strategic Employment Site



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1 Introduction

- 1.1 This development prospectus explains and illustrates in greater detail the potential of Hilton Park, Junction 11 (the Site) to accommodate employment development pressures at a local and sub-regional level. In doing so, it seeks to demonstrate that the Site is suitable, available and achievable as a potential strategic employment site – the primary tests set by PPG for the allocation of sites.
- 1.2 The scope of this prospectus covers a number of different issues and context. It provides:-
 - In Section 2, a brief overview of the current market for Class B employment development in this location and an explanation of what industrial and distribution occupiers currently require from development land.
 - In Section 3, a summary of the principal site characteristics and why these make the Site so attractive for employment land development.
 - In Section 4, a wider look at how the Site connects with the workforce particularly in respect of the Black Country due to its close economic relationship with South Staffordshire.
 - In Section 5, the sustainability appraisal that has been undertaken is considered. This includes a number of discreet surveys carried out by specialist independent consultants and allows a comparison with the exercise carried out by Amec on behalf of South Staffordshire Council of the four freestanding Strategic Employment Sites currently being promoted by the adopted Core Strategy for South Staffordshire and proposed extensions of two of the sites by the Site Allocations.
 - In Section 6, schematic drawings are introduced showing how the Site could be developed either with or without the M54/M6/M6 (Toll) Link Road running through the western edge of the Site. It is explained also how the constraints and parameters of the survey work have been taken into account and the range of buildings that could be provided.
 - In Section 7, reference is drawn to a Green Belt assessment undertaken by an independent consultant, Tyler Grange. This provides a review of the contribution that the Site makes to the Green Belt and compares this to the exercise LUC have carried out for South Staffordshire Council in respect of possible extension to the four freestanding Strategic Employment Sites.
 - In Section 8, principal **conclusions** are drawn.
- 1.3 This prospectus has been written with the full assistance of a core team of specialist consultants. These consultants all have significant experience in promoting strategic employment land sites and know the area well. The core consultant team is as follows:-

Planning Consultant and Agency Advisors – JLL Joint Agency Advisors – Bulleys Transportation and Highways Engineers – DTA Landscape and Visual Assessment Consultants – FPCR Heritage, Ecology and Tree Consultants – RPS Master Planners and Architects – AJA Architects Drainage, Services and Infrastructure Engineers – Shepherd Gilmour Green Belt Advisor – Tyler Grange

Recent Market Trends in the Sub Region

- 2.1 The industrial and warehouse property market for the Sub-Region continues to grow after a strong period of demand over the last 3/4 years. The split in demand between manufacturing and warehousing is approximately equal, with the manufacturing sector continuing to strengthen. The decision by Jaguar Land Rover (JLR) to increase the size of their state of the art manufacturing plant at i54 South Staffordshire to around 2,000,000 sq ft (185,000 sq m) further underpins the strength of demand in this area. As a result, increased demand is expected from the supply chain going forward.
- 2.2 There has been a lot of recent activity elsewhere in the sub-region. Notable recent deals and development activity in the last 12-18 months include:-
 - Areva (now GE) taking a new 200,000 sq ft R&D building at Redhill, Stafford (having taken 230,000 sq ft in the same location in 2015).
 - Trebor Developments have completed a 113,000 sq ft spec built industrial building, Triton, at Redhill, Stafford.
 - JLR taking a further 900,000 sq ft at i54 (to expand existing operations at the site to 2,000,000 sq ft).
 - ERA occupying a 135,000 sq ft industrial building at i54, built by Stoford Developments.
 - Magna International occupying 225,000 sq ft at T54, Telford.
 - Gestamp agreeing to lease 550,000 sq ft at Bericote, Four Ashes, with practical completion scheduled for August 2017.
 - Steel & Alloy Processing Limited taking Zenith a 115,000 sq ft new build at Oldbury by Trebor Developments, with room for expansion up to 280,000 sq ft. Occupation due November 2017.
 - First Choice occupying a new 100,000 sq ft warehouse at Kingswood Lakeside, Cannock.
 - The completion of 372,000 sq ft unit at Kingswood Lakeside, Cannock, known as M6DC, by Exeter Property Group and Graftongate. This is the largest spec build in the West Midlands.
 - Ministry for Defence Procurement has opened its new 900,000 sq ft Defence Fulfilment Centre at Donnington, Telford.
 - Construction has started of Alpha 154,000 sq ft at Conneqt, Kingswood Lakeside, Cannock, a spec development by Opus Land. This will be available in Q2 2018.
 - Aviva and Canmoor have started construction of Jupiter, a 145,000 sq ft spec build unit, at Watling Street, Cannock. Available in March 2018.
 - Tentec have taken a 46,000 sq ft pre-let at the Mucklow development at i54 on Mucklow Park i54.
 - Seconique have taken a 400,000 sq ft second-hand unit at Wobaston Road, Wolverhampton.
 - Craemer Group has agreed to buy a 13 acre site in Telford to build a new production facility.

- 2.3 In addition, there is speculative development of smaller units, which is a clear signal of returning developer and investor confidence and the strength of demand in the industrial sector in this location. This includes:-
 - Construction of 66,628 sq ft and 76,908 sq ft units at Prime Point 14, Stafford by Trebor
 Developments and Seddon. Groundworks have started, with practical completion due Q2 2018.
 - Prime Point 4 unit scheme totalling 130,000 sq ft (ranging from 10,000 sq ft to 40,000 sq ft units) on the Pensnett Estate, Kingswinford by LCP. Under construction. One unit of 30,000 sq ft pre-let to Really Useful Products.
 - Steelpark Trading Estate 70,000 sq ft scheme, providing units from 9,000 to 21,500 sq ft in Wednesfield by Goold Estates. Practical completion due December 2017. One unit under offer.
- 2.4 Over the past 12 months there have been in the order of 106 industrial/warehouse property enquiries received by Bulleys of between 20,000 sq ft (1,900 sq m) and 50,000 sq ft (4,600 sq m). This represents demand in excess of 4.2 million sq ft (390,000 sq m) in the Sub-Region.
- 2.5 Over the same period, there have been in the order of 51 industrial/warehouse property enquiries received by Bulleys of between 50,000 sq ft (4,600 sq m) and 100,000 sq ft (9,300 sq m). This represents demand for a further 4.2 million sq ft (390,000 sq m) in the Sub-Region.
- 2.6 The following shows a selected number of good quality industrial/warehouse property requirements in excess of 100,000 sq ft covering the Black Country and Southern Staffordshire:-
 - DX Logistics 250,000 sq ft in southern Staffordshire.
 - Intralox 200,000 sq ft B2/B8 in the Black Country.
 - AF Blakemore circa 100,000 sq ft in the Black Country.
 - BJS 400,000 sq ft in the Black Country.
 - JLR supplier 200,000 sq ft in the Black Country.
 - Lidl 50,000 -100,000 sq ft centred on Wednesbury.
- 2.7 We see a particular sweet spot in terms of demand for the Black Country sub-regional market of industrial and distribution units between 100,000 sq ft and 250,000 sq ft. In addition, there is good local demand for units less than 100,000 sq ft from 25,000 sq ft upwards.
- 2.8 Coupled with this demand is the chronic shortage of deliverable 'shovel ready' development sites and good quality existing premises coming to the market. Consequently, as and when either such sites or existing premises are made available take up is usually very quick on terms which now show significant hardening, manifesting growth in prices and rents. This is particularly so in South Staffordshire, which has acted as a pressure valve to the Black Country due to its close economic relationship with the Black Country and the relative lack of suitable sites, as recognised by recently undertaken studies (i.e. WECD's 2014/15 Employment Land Studies and 2017 EDNA).
- 2.9 The recent activity at i54, as referred to above, has resulted in no further consented land being available apart from the 12 acres (5 ha) under option to Mucklow. In addition, only 17 acres (7 hectares) (split between 3 plots on 2 sites) is available at Hilton Cross (being marketed as Mercury and Vernon Park). This apart, the only other land available at the four freestanding Strategic Employment Sites in South Staffordshire is the Bericote scheme at Four Ashes, with 25 acres (10 ha) remaining following the Gastamp deal. JLL is the marketing agent for both Mercury and the Bericote scheme and can report very strong

interest in both sites and anticipate the remaining land will be taken up quickly. In addition, there is little land available within Cannock following significant recent development activity.

2.10 It is clear that in the Sub-Region of the Black Country and southern Staffordshire demand is fast outstripping supply. Consented and deliverable supply will soon run dry and will need to be replenished by new deliverable sites in order for the market to continue to function properly and ensure economic growth is not stifled.

Occupier's Requirements

- 2.11 The three basic criteria for industry and warehousing are as follows:-
 - Location
 - Land
 - Labour
- 2.12 Quick access to the national motorway network is fundamental. This is just not to save time, but also to provide certainty in the despatch and delivery of goods. Modern operators need to be as risk adverse as possible in order to function properly. Congested A or minor roads, particularly that have to route through built up and residential areas, are to be avoided.
- 2.13 Access to rail. For the purposes of freight, this has become an increasingly bigger issue in recent years. Developers are aware that good rail access can help to future proof their developments. As road congestion increases, and fewer HGV drivers get qualified, there will be greater economic pressure to use rail over road in the medium and long term. This will place sites that are well located relative to rail freight facilities at a premium in the future.
- 2.14 Land that can accommodate large buildings i.e. 20,000 sq m (200,000 sq ft) plus and/or a cluster of smaller sized buildings, which can operate without any restrictions, is in demand. This requires sites in excess of 20 hectares (50 acres).
- 2.15 Operators require premises away from housing. Many modern and industrial and warehouse operators are run on a 24/7 basis. Buildings also require good eaves height, with additional features sought such as sufficient yard space, docking and circulation.
- 2.16 Whilst sites away from housing are preferred, strategic employment land does need to be well related to existing built and proposed settlements. As the economy continues to improve, the importance of a large catchment population to employment sites has increased. This is to ensure a sufficient labour supply.
- 2.17 Finally, strategic employment sites require a pleasant, well designed and landscaped setting. This is important in attracting and retaining staff.

3 Site Characteristics

3.1 Nurton Developments (Hilton) Ltd (NDHL) is promoting a site for employment development that it considers is suitable, available and achievable and which is superior in these respects, and in terms of market attraction and delivery, than identified Premium sites in the Black Country (with reference to the Stage 1 Black Country EDNA, May 2017 of WECD) and potential extensions to the four freestanding Strategic Employment Sites designated by the South Staffordshire adopted Core Strategy.

Site Details

3.2 The location of the Site is shown on the plan below (Figure 1)

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3.3 The extent of the Site, and its immediate situation, is depicted in more detail on the plan below (Figure 2). The boundaries of the Site are marked in red.





Figure 1 – Site Location

- 3.4 A full sized version of this plan at a scale of 1:10,000 is provided in **Appendix 1**.
- 3.5 The Site has a gross area of 88.90 hectares (220 acres). As will be considered in Section 6, the actual developable area nets down to between 59 hectares (145 acres) and 65 hectares (160 acres), depending on the route of the M54 M6 M6 Toll Link Road.

Suitability

- 3.6 In market terms, the Site enjoys many significant advantages. These include:-
 - Location directly to the south-west of Junction 11 of the M6 Motorway.
 - Direct access to the A460, which connects to the M6 at Junction 11.
 - Easy access via the A460 to the Pentalver rail freight interchange at Cannock.
 - Location accessible to the principal settlements of the area (i.e. the Black Country, Cannock, Stafford and Lichfield), giving good reach to the local labour supply.
 - A regular shaped site that enjoys prominence to the M6.
 - A large sized site that can accommodate a critical mass of buildings in the 100,000 sq ft to 250,000 sq ft range, and possibly larger if required.
- 3.7 The location of the Site will be further improved when the proposed M54/M6/M6 (Toll) Link road is built. This link road will significantly increase road capacity on both the M6 and A460 and will make Junction 11 a stronger nodal point on the national and regional motorway network, providing a 'crossroads' connection of the M54, M6 and M6 (Toll).
- 3.8 The Site is free of major constraints. There are no obvious physical limitations or issues such as access that cannot be mitigated satisfactorily. This is addressed further in Sections 5 and 6.
- 3.9 Aside from the Green Belt (which constrains any development outside the built up area of the Black Country), the Site is not designated by the adopted Local Plan for any landscape or conservation purposes.

Availability

- 3.10 NDHL has an exclusive agreement with the three principal landowners of the Site to promote the land and procure its development.
- 3.11 NDHL is a competent developer well practiced in bringing forward complex or significant developments. In addition, it enjoys a good relationship with Highways England and Staffordshire County Council, through the promotion of a sustainable urban extension at Burton (that includes 1,000,000 sq ft (930,000 sq m) on 20 hectares (50 acres) of employment land) at Branston Interchange on the A38(T).
- 3.12 NDHL is fully committed to the scheme and is already investing significant sums in promoting this development opportunity. It has instructed a full consultant team to undertake the necessary surveys and produce supporting technical information.

Achievability

- 3.13 Given the locational advantages the Site enjoys, both JLL and Bulleys are very confident the Site will prove attractive to occupiers who are looking to source requirements in the Sub-Region of the Black Country and southern Staffordshire. The Site enjoys a unique combination of characteristics that makes it particularly suitable to accommodate and attract local, sub-regional and regional companies looking for industrial and warehouse property in this area.
- 3.14 As such, and given its limited constraints, NDHL is confident that the prospects for development of this Site are extremely good.

4 Connectivity

4.1 The specific issue of connectivity has been considered by DTA, which has produced an outline Transport Strategy. A copy of this strategy forms **Appendix 2**.

Vehicle Access

- 4.2 The Site can currently be accessed either via the M6 junction 10A/M54 Junction 1 or via the M6 Junction 11 and the A460. It is uniquely well placed to benefit from the future M54/M6/M6 (Toll) Link road and Junction 11 improvements proposed. Due to the Site's beneficial location, it is considered highly suitable for substantial high quality employment development serving both local and more strategic markets.
- 4.3 Three options to the route of the M54 M6 M6 (Toll) Link Road have been consulted upon and a preferred route announcement is anticipated later this year. Any of the options would free up capacity on the A460, and related strategic road network, with Junction 11 becoming an important nodal point.

Public Transport Strategy

- 4.4 Public transport access to new major industrial and warehousing development has evolved over recent years and it is now possible and viable to serve site specific shift change patterns by public transport from wider catchment areas. In this case, the Site benefits from existing services on key routes and this can be expanded to accommodate other key catchment/demand areas.
- 4.5 The nearest bus stops are adjacent to the south-west corner of the Site along the A460 opposite Church Road. In due course, these will be upgraded and, as necessary, stops provided within the Site itself.
- 4.6 The nearest railway station is at Landywood, located within 5 kilometres to the east of the Site. Cannock railway station is located approximately 6.5 kilometres to the north-east of the Site, which is considered to be an appropriate distance from the Site due to the good access to bus services along the A460. The Site is also located within 1 kilometre of a Post Office.
- 4.7 Whilst some employees would need to travel by car, the Site offers significant opportunities to improve accessibility to and from the expected employment catchment, including the provision of high quality site specific public transport shuttle buses and comprehensive travel planning measures. Such measures have been very successful at significantly reducing the need to travel by car on similarly located large scale warehousing and industrial developments.
- 4.8 Examples in the sub-region include Amazon at Rugeley and JLR at i54. i54 has a wide range and successful level of bus services to it. These services penetrate local areas of labour in the Black Country and provide links to Stafford and Cannock. Number 154 runs past the Hilton Park site and provides an established route to and from Stafford and Penkridge to serve the Site for early morning shift changes. The Site is capable of being well served by high quality public transport along the A460 corridor providing easy access to nearby centres and facilities, and to a large pool of available labour in Cannock, Wolverhampton and other nearby settlements, particularly the Black Country, via existing services.

Employment Catchment

- 4.10 The South Staffordshire Site Allocations Issues and Options consultation Addendum to the Initial Sustainability Report (by Amec) included at Section 3.8 a map showing economically deprived areas within South Staffordshire. It is evident from this map that the Site is situated within the vicinity of relatively deprived areas specifically to the north of an area considered to be "the most deprived". Therefore, development of the Site would offer a range of employment opportunities, around 4,000, to local communities as well as people from further afield, through both the construction phases and end uses. This will significantly benefit the area.
- 4.11 A 30 minute drive time employment catchment area of the Site has been identified and forms Figure 3 below.

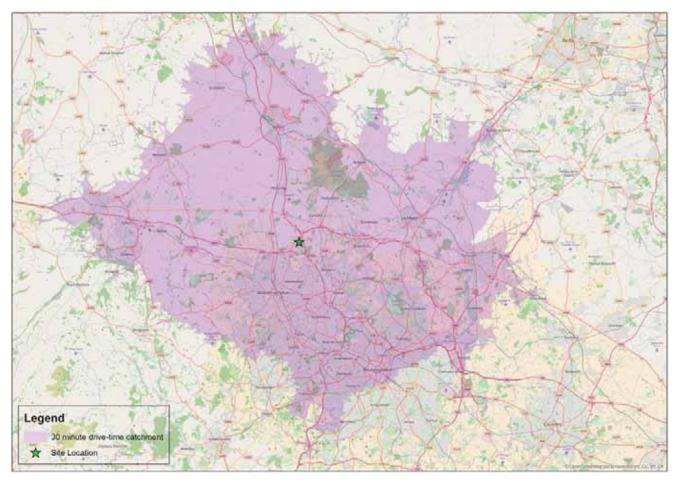


Figure 3 – 30 minute drive time catchment area to the site

- 4.12 The catchment incorporates a number of key potential employment generators, such as Cannock, Wolverhampton, Walsall, Wednesbury, Lichfield, Stafford and Rugeley. It also covers the Sandwell Travel to Work Area (TWA). This is a deprived area that would benefit from employment opportunities provided by the proposed development.
- 4.13 Investment in improvements in bus routes to link the site to areas of the Black Country to the south i.e. Sandwell and Dudley could be funded by the development. The development could also enable service enhancements to existing routes between Wolverhampton and Cannock.

5 Sustainability

- 5.1 NDHL has commissioned a number of surveys and studies to understand properly the constraints and parameters of proposed development. This is to inform the production of indicative schemes (that are reviewed in the next section). In addition, it has enabled NDHL to undertake a basic sustainability appraisal of the site and the development proposals.
- 5.2 The following surveys and studies have been undertaken:-
 - Topographical survey by Shepherd Gilmour.
 - Phase 1 Geo-Environmental Site Assessment by Shepherd Gilmour.
 - Tree Survey by RPS.
 - Ecological Appraisal by RPS.
 - Landscape and Visual Assessment by FPCR.
 - Heritage Assessment by RPS.
 - Preliminary Infrastructure Statement (covering flooding, drainage and utilities) by Shepherd Gilmour.
 - Transport Strategy by DTA (as referred to in the previous section).
 - Preliminary Cut Fill Analysis by Shepherd Gilmour.
- 5.3 These surveys have identified no significant impediment against strategic scale employment development of the Site. Moreover, they have helped to inform the master planning of the Site. A summary of the sustainability appraisal is provided below in Table 1.

Table 1 – Comparative	Sustainability Appraisal	of Employment Developm	ent at Hilton Park

Parameter	Comments
Efficient use of land	Site is greenfield (as are most other candidate strategic sites)
Flood risk	Flood risk is only apparent on the EA map along the route of the brook that runs through the very north of the Site. This brook and the valley it sits in has been taken out of the developable area of the Site. As such, there is no risk from flooding.
Bio-diversity	The Site is not contained nor within 2 kilometres of any statutory designated site (such as a NNR, SSSI or SAC). It does not contain some non-statutory designated sites, but these are respected by the proposed development.
Landscape Quality	The Site is not located within or close to an AONB. Nor is it covered by any local landscape quality designation.
Heritage Assets	The Site is located outside and to the north of an Historic Landscape Area associated with the Grade I listed Hilton Park. There are no other designated sites within the development area. The Heritage Assessment by RPS concludes that the proposed development would have no significant effect on the setting of Hilton Park or the listed buildings given the relative lack of visibility between the Site and Hilton Park.
Air Quality	The Site is located outside any AQMZ.

Accessibility	The Site is located both within 5 kilometres of a railway station and within 1 kilometre of a Post Office. The A460 is well served by bus routes. Further details are provided in the Transport Strategy.
Economic Opportunity for Deprived Areas	The Site is located just to the north of one of the most deprived areas in South Staffordshire and is within the catchment area for much of the Black Country, including Sandwell.

5.4 On the basis of these basic criteria, the Site is at least as sustainable as the existing four freestanding Strategic Employment Sites allocated by the South Staffordshire Core Strategy, if not better. In terms of accessibility, the Site scores best. In addition, as will be seen in the next section, issues associated with drainage, bio-diversity, trees, landscape and heritage can all be managed and mitigated through good design.

6 Development Proposals

Scheme Proposals

- 6.1 AJA Architects have produced 3 preliminary master plans for the Site. Drawings of these master plans are provided in **Appendix 3**.
- 6.2 The master plans show how the Site can be developed in the case of three different scenarios:-
 - 1. Drg No. 5687-030 Option A of the M54/M6/M6 (Toll) Link Road
 - 2. Drg No. 5687-031 Option B of the M54/M6/M6 (Toll) Link Road
 - 3. Drg No. 5687-032 M54/M6/M6 (Toll) Link road does not run through the site
- 6.3 The scale of development for each scenario is as follows:-

Table 2 – Scale of Development at Hilton Park, Junction 11 for Each Scenario

Scenario	Gross Area Hectares (Acres)	Net Developable Area Hectares (Acres)	Floor Space m ² (sq ft)
1	88.90 (220)	51.33 (126.8)	206,020 (2.22 million)
2	88.90 (220)	52.39 (129.5)	207,690 (2.3 million)
3	88.90 (220)	57.39 (142.3)	229,862 (2.47 million)

6.4 Scenarios 2 and 3 take their access from the A460. Scenario 1 takes its access from the proposed link road, which has a connection with Hilton Lane (Option A).

Constraints and Parameters to Design Process

6.5 The master planning exercise has been informed to a large extent by consideration of the constraints and parameters derived from the survey work undertaken on landscape, heritage, ecology, tree survey and cut and fill analysis. The principal cues used by AJA Architects can be summarised as follows:-

Landscape & Visual Assessment

- The cut and fill exercise to form development plateaus will avoid buildings being sited on the existing higher ground.
- A landscape buffer has been provided to Hilton Lane in order to protect both the residential properties and Hilton Park.
- As part of the earthworks strategy, mounding will be created as necessary in order to form screening to the development.
- Substantial buffers have been provided to the existing on-site wooded areas. This would allow new woodland planting to be implemented.
- Existing rights of way are to be relocated and combined with the retained green infrastructure, as part of the development strategy.
- Considerable areas have been set aside for green infrastructure and associated habitat creation.

Heritage Assessment

The proposed development would have no significant effect on the setting of Hilton Park to the south or on the listed buildings, due to the existing and proposed extensive landscape screening between the two.

Ecological Appraisal

- There are no Statutory Designated Sites within the Site. However, there are two Non-Statutory Designated Sites. Both 'The Hag' (Retained Biodiversity Alert Retained Site RBAS) and the part dry and part wet woodland to the north of the site, known as 'Brookfield Farm (north-east of), Shareshill' (Site of Biological Importance SBI) are retained within the master plan schemes, with substantial buffers between them and any development.
- The species rich, defunct hedgerow extending westwards from 'The Hag', together with the two adjacent field trees (oaks) have also been retained.
- The land to the north of the 'Brookfield Farm (north-east of), Shareshill' woodland is currently left undeveloped, providing the opportunity for further habitat creation.
- The unclassified area of semi-natural woodland and fishing ponds within the centre of the Site is retained and buffered in the same way.
- The line of the water course that feeds this area is also retained between the woodland and the site boundary to the south, to provide an opportunity for an improved natural landscape corridor and connectivity to Hilton Lane and beyond.
- Of the 11 on-site ponds, 6 are maintained. These are the two within 'The Hag' and the four fishing ponds within the centre of the Site.
- All existing vegetation around the Site boundaries will remain untouched and will be improved as part of the proposals.
- The proposals generally avoid noted species habitats, as these occur within or adjacent to the areas listed above.
- New green corridors can be created along the long boundaries between plots, where no existing ecological feature exists. These can include new hedgerows to offset unavoidable hedgerow loss and will be designed to provide features consistent with the general character of the area, as well as providing habitat & foraging opportunities for a range of species. These will contribute to the connectivity of the retained on site ecological features with the Site perimeter landscaping and that beyond.
- Suitable buffer zones are generally proposed along existing woodland edges, hedgerows and stream corridors.

Tree Survey

- There are seven individual trees and areas of woodland in the part dry and part wet woodland to the north of the Site, known as 'Brookfield Farm (north-east of), Shareshill' that are protected under Tree Preservation Orders, administered by South Staffordshire Council. None of these are affected by the proposed development.
- The vast majority of all existing trees on Site are retained as part of the proposals. Unavoidable tree loss occurring away from the retained areas described above, can be offset by ample opportunity to plant new trees elsewhere within the site.

Preliminary Cut Fill Analysis

- Shepherd Gilmour have created four main plateaus across the original Site. This forms the basis of the plots for DC1a-i, DC1-3, DC4-7 and DC8-11.
- The plateau for DC8-11 involves the reduction in height of the existing low hill by approximately 10m, thus reducing the visual impact of this unit.
- The other plots will also be reduced in level up against their southern boundaries, reducing the impact of the buildings with respect to Hilton Lane, the existing housing and Hilton Park.
- 6.6 In addition, these drawings have been discussed with Highways England to ensure that the area of land safeguarded for the route of the link road (if Option A or B are chosen) is sufficient and that the routing is realistic. Highways England has confirmed that both are.

Scale and Range of Buildings

- 6.7 The plans are indicative. However, they reveal the scale of development that can be accommodated and attracted to the Site. In addition, they demonstrate how the scheme will be affected (but not constrained unduly) by the link road.
- 6.8 The Site can accommodate a significant cluster of buildings in the range between 100,000 sq ft and 250,000 sq ft. As referred to in Section 2, JLL and Bulleys consider this to be a particular sweet spot in the market for industrial and distribution units in the Black Country and its hinterland. Larger sized units can be provided if demanded.
- 6.9 In addition, JLL and Bulleys consider the Site will be attractive to smaller enquiries serving the local SME market. In each scenario, a substantial level of floor space has been provided to companies seeking space from 25,000 sq ft (2,300 sq m) to 100,000 sq ft (9,300 sq m).

7 Green Belt Review

Scope

- 7.1. Tyler Grange has been appointed by NDHL to undertake a review of the contribution that land at the Site makes to the function and purposes of the Green Belt. A copy of their review forms **Appendix 4**.
- 7.2. Within the Publication Draft of the South Staffordshire Site Allocations, it is proposed that land for additional employment development is released from the Green Belt at the i54 and ROF Featherstone Strategic Employment Sites. The proposed releases are informed by the findings of the Council's Green Belt Review (the South Staffordshire Partial Green Belt Review Method Statement January 2014) by LUC.
- 7.3. The Site has not been subject to a Green Belt Review by South Staffordshire Council. Instead, the Council has limited its consideration to extension to the four existing freestanding Strategic Employment Sites. Therefore, in order to enable a comparison to be drawn between the Site and the other Strategic Employment Sites, Tyler Grange has undertaken a Green Belt Review that assesses the contribution that the Site makes to the Green Belt. It also considers how land at the Site could be released from the Green Belt to ensure that a defensible new Green Belt boundary is achieved.

Findings of Green Belt Review

- 7.4. The assessment divided land at the Site, which is defined by the M6, A460 and Hilton Lane, into 8 individual land parcels. This has allowed for consideration of variations in land use and location in relation to settlements and boundaries.
- 7.5. As with the Council's Green Belt Review, parcels were scored as making a 'Significant Contribution', 'Contribution' or 'More Limited Contribution' to the Green Belt.

Overall Contribution to Green Belt

- 7.6. None of the parcels were assessed as making a 'Significant Contribution' to the Green Belt. The Site has been assessed as making an overall 'Contribution' to the Green Belt for all of the parcels. This reflects the findings for each parcel containing at least one purpose which has been assessed as making a 'Contribution', and does not relate to all purposes for each parcel.
- 7.7. The area is separated from neighbouring settlement and contained by a number of significant boundaries, including the M6 motorway, A460 (Cannock Road), Hilton Lane, tree belts and woodland. The influence of adjacent urban influences, ribbon development and main roads place the area within an urban fringe location, reducing the contribution that it makes to safeguarding the countryside from encroachment.
- 7.8. The findings of the assessment relating to each of the five Green Belt purposes are summarised below:

To check the unrestricted sprawl of large built-up areas

7.9. All of the parcels were assessed as making 'More Limited Contribution' (the lowest possible score) when considered in relation to their proximity to urban or industrial areas. The Site is separated from Shareshill by the A460.

7.10. Existing ribbon development along Hilton Lane and the A460 introduce sprawl extending from Shareshill. Parcels to the south and west of the Site bounding these roads have been assessed as making a 'Contribution' to this purpose.

To prevent neighbouring towns merging into one another

- 7.11. Although the Site is situated within close proximity to Shareshill on its western edge, the A460 and ribbon development serve to limit parcels to the west of the area as making a 'Contribution' to this purpose. Parcels to the east that are more distant form Shareshill were assessed as making a 'More Limited Contribution'.
- 7.12. Roads, woodland and tree belts bounding the Site and within the adjacent area serve to limit the potential for the physical or visual merging of settlements. The Site has been assessed as making a 'More Limited Contribution' to this criterion.

To assist in safeguarding the countryside from encroachment

- 7.13. The roads bounding the wider site area provide robust, defensible boundaries and limit the potential for encroachment into the wider countryside.
- 7.14. The presence of adjacent settlement and major road infrastructure influences the tranquillity, rurality and character of the Site and surrounding area. This serves to limit the contribution that all parcels make when assessed against the significance of existing urbanising influences and development. This has resulted in an assessment of making a 'Contribution' for all parcels.

To preserve the setting and special character of historic towns

7.15. None of the parcels have been assessed as making greater than a 'More Limited Contribution' to this purpose. None of the parcels are situated within or adjacent to a historic town or settlement containing a Conservation Area, nor facilitate recognised important views to or from a Conservation Area.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

7.16. This purpose was not assessed, as it is considered that all land within the Green Belt performs this function equally.

Conclusions

Comparative Assessment of Strategic Employment Sites

- 7.17. When compared with the findings of South Staffordshire Council's assessment of the Strategic Employment Sites, the Site has been assessed as making the same overall contribution to the Green Belt as land at the i54 and ROF Featherstone sites that are proposed for release within the Publication Draft of the South Staffordshire Site Allocations. In making this assessment of the Site, Tyler Grange has undertaken a more robust approach than LUC in qualifying how the Site is graded as to its overall contributions.
- 7.18. This assessment is supported by South Staffordshire Council's Review identifying factors that are shared between the three sites. These include the separation from nearby settlements by roads, motorways and railways, and urbanising influences limiting the contribution the land makes to safeguarding the countryside from encroachment.
- 7.19. Land west of Hilton Cross has been assessed by the Council as making a 'Considerable Contribution' to the Green Belt due to potential sprawl, merging and encroachment into the countryside. Land to the east of

Hilton Cross has been assessed as making a 'Contribution', due to the distance with Wolverhampton and potential for encroachment into the countryside.

7.20. Land to the west of Four Ashes has been assessed by the Council as making a 'Considerable Contribution' to the Green Belt due to potential to facilitate sprawl and encroachment on the countryside. Other parcels have been assessed as making a 'Contribution' or 'More limited Contribution' due to their containment and separation.

Release of Land from the Green Belt and Re-drawing of Green Belt Boundaries

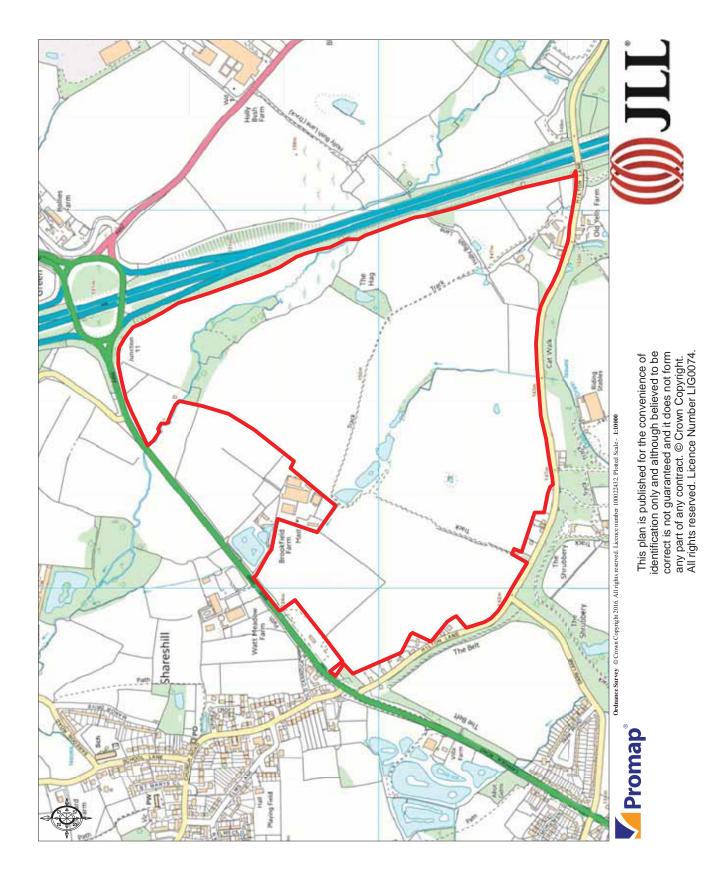
- 7.21. With the existing freestanding Strategic Employment Sites in South Staffordshire, a precedent has already been set within the District for employment sites to be removed from the Green Belt in locations close to, but separated from existing settlements by main roads. This is an approach that is continuing to be supported by the South Staffordshire Council through its approach to favouring the expansion of the existing employment sites in these locations.
- 7.22. Having regard to these requirements as set-out at paragraph 85 of the NPPF, the existing roads bounding the Site provide recognisable, permanent boundaries that could clearly and robustly define the release of land from the Green Belt. There are opportunities to enhance existing tree belt and woodland planting to site boundaries along these roads. This would further strengthen the boundaries, containing the area both physically and visually, whilst reducing impacts associated with the proximity to Shareshill in addition to properties along Hilton Lane.

8. Conclusions

- 8.1. The industrial and warehouse property market for the Sub-Region continues to grow after a strong period of demand over the last 3/4 years, which has witnessed a great deal of activity. There is now a chronic shortage of deliverable land and supply of buildings. This will need to be replenished by new sites in order for the market to function properly and to ensure economic growth is not stifled.
- 8.2. The Site enjoys many significant advantages, principally due to its location at the junction of the M6 motorway and the A460, its accessibility to Pentalver Rail Freight Terminal at Cannock, and its size. The Site is free of major constraints and clearly **suitable** for large scale employment development.
- 8.3. The Site is **available** with NDHL fully in control of and committed to the Site's promotion and successful delivery.
- 8.4. The Site is **achievable** due to its principal characteristics. Specifically, the Site meets all the operational requirements of modern industrial and warehouse businesses in terms of location, situation and siting.
- 8.5. The Site is **sustainably located** in respect of alternative modes of transport and offers significant opportunities for enhancement of public transport serving the local area. The Site is **well located in respect of the labour market**, with its 30 minutes catchment taking in much of the Black Country, including all of Sandwell, Cannock, Lichfield, Stafford and Rugeley.
- 8.6. NDHL has commissioned a number of surveys and studies to understand properly the constraints and parameters which apply to the proposed development and in order to undertake a basic sustainability appraisal of the Site and development proposals. The Site has proved to be as least as **sustainable** as the existing Strategic Employment Sites serving South Staffordshire, if not better, particularly in terms of accessibility.
- 8.7. The development proposals, illustrated by three different master plans, show how the Site can be developed with or without the proposed M54 M6 M6 Toll Road link road and how the constraints and parameters imposed by reasons of landscape, heritage, ecology, trees and cut and fill are respected and mitigated. The three schemes yield a net developable area of between 51 hectares (127 acres) and 58 hectares (142 acres), generating between 206,000 sq m (2.22 million sq ft) and 230,000 sq m (2.47 million sq ft).
- 8.8. In addition, they demonstrate the capacity of the Site to provide a wide range and significant cluster of buildings in the range between 100,000 sq ft and 250,000 sq ft, which JLL and Bulleys consider there to be a particular sweet spot in industrial and distribution requirements for the Black Country and its hinterland. In addition, the scheme can accommodate smaller enquiries serving the local SME market, with units from 25,000 sq ft.
- 8.9. Tyler Grange has been appointed by NDHL to undertake a review of the contribution that the Site makes to the function and purposes of the Green Belt. The assessment divided the Site, which is defined by the M6, A460 and Hilton Lane, into eight individual land parcels. This has allowed for consideration of variations in land use and location in relation to settlements and boundaries.

- 8.10. None of the parcels are assessed as making a "significant contribution" to the Green Belt. The Site has been assessed as making an overall "contribution" to the Green Belt for all of the parcels. This reflects the findings for each parcel containing at least one purpose which has been assessed as making a "contribution" and does not relate to all purposes for each parcel.
- 8.11. When compared with the findings of South Staffordshire Council's assessment of Strategic Employment Sites (to inform its Site Allocations), the Site has been assessed as making the same overall contribution to the Green Belt as the land at the i54 and ROF Featherstone sites that are proposed for release within the Publication draft to the South Staffordshire Site Allocations. This assessment is supported by the Council's Review identifying factors that are shared between the three sites. These include the separation from nearby settlements by roads, motorways and railways, and urbanising influences limiting the contribution the land makes to safeguard the countryside from encroachment.
- 8.12. Having regard to the requirements set out in Paragraph 85 of NPPF, the existing roads bounding the Site provide recognisable, permanent boundaries that could clearly and robustly define the release of land from the Green Belt. In addition, there are further opportunities to enhance existing tree belt and woodland planting to site boundaries along these roads. This would further strengthen the boundaries, containing the area both physically and visually in reducing impacts associated with the proximity to Shareshill as used by properties along Hilton Lane.
- 8.13. For these reasons, JLL considers that the Site meets the relevant tests set out by PPG for the allocation of development sites i.e. due to its **Suitability, Availability and Achievability** and by NPPF for the release of sites from the Green Belt. The chronic shortage of consented and marketable employment development land, and future high quality (i.e. Premium) strategic sites (as identified by the Black Country 2017 EDNA), and the well evidenced need to allocate significantly more land in this location to meet the sub-regional needs of the Black Country, requires serious consideration to be given to this Site. Releasing this Site from the Green Belt and allocating it as a Strategic Employment Site will help to ensure that the basic requirements of the four Black Country Councils in terms of meeting the Objectively Assessed Needs of their area and its Duty to Co-operate with neighbouring authorities (i.e. South Staffordshire Council) are fulfilled in the most effective manner.

Hilton Park Site Plan





1.0 INTRODUCTION

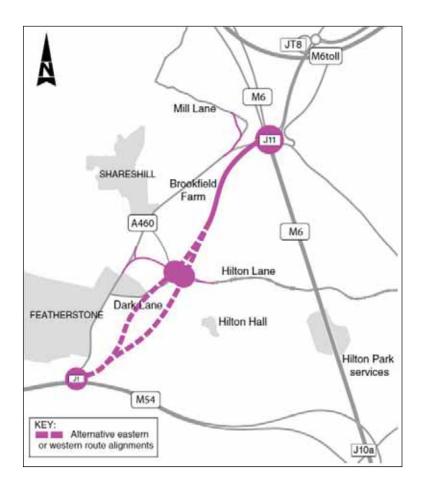
- 1.1 This Technical Note has been prepared by David Tucker Associates to provide an overview of the vehicle access, public transport strategy, air quality management, trip generation and parking associated with proposals for the development of land at M6 Junction 11 to provide 2-3 million sqft of employment development. The location of the site is shown on **Appendix A**.
- 1.2 The site, which falls within greenbelt and covers an area of approximately 100ha, is located to the south of M6 Junction 11, to the north-east of Featherstone and immediately east of Shareshill. The land is bound to the west by the A460 Cannock Road, to the east by the M6 Motorway, and to the south by Hilton Lane.

2.0 BACKGROUND

- 2.1 A new link between the M54, M6 North and M6 (Toll) is being promoted by Highways England. Representations to the consultation have been made on behalf of the Hilton Park site
- 2.2 In both the June 2013 Spending Round announcement and the National Infrastructure Plan December 2013, the Government announced that it would fund a scheme for a new M54/M6/M6(Toll) link road subject to finalisation of options and agreement on developer contributions. The Road Investment Strategy, produced by the Department for Transport and Highways England published on 1 December 2014, confirmed the M54/M6/M6(Toll) link road as a committed scheme with works on site due to commence in the first half of 2019 and completed within three years.
- 2.3 A public consultation on three proposed route options ended on 30 January 2015.A summary of the options is provided below:
 - **Option A** would provide a new dual carriageway road between M54 junction 1 and M6 junction 11, covering approximately 2.5km. The proposed route would bypass the villages of Featherstone and Shareshill, and be sited to the

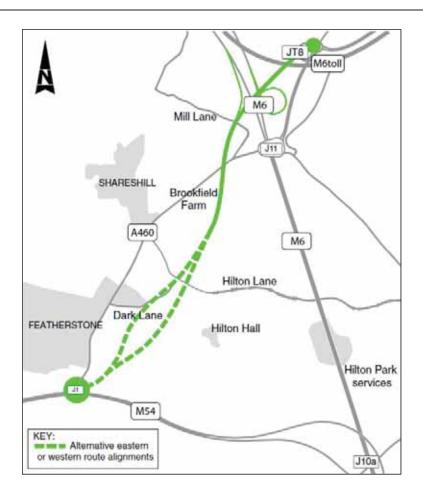


west of Hilton Hall, with a junction provided at Hilton Lane. There would be no access from the existing A460 to M6 junction 11 on the west side of M6 as this would be removed to move through-traffic to the new road.



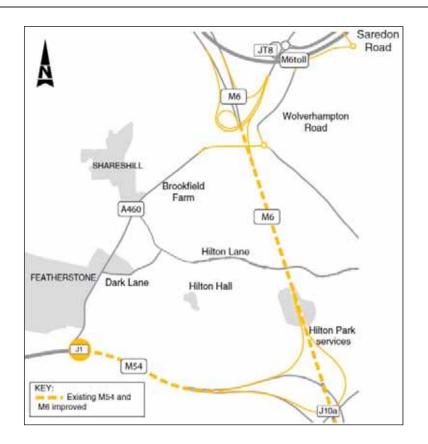
Option B would provide a new dual carriageway road between M54 Junction 1 and the M6 and M6 Toll, following the same route as Option 1 - bypassing the villages of Featherstone and Shareshill. The new road would then link directly with the M6, north of Junction 11 and with the M6 Toll at Junction T8. M6 Junction 11 would be unchanged by this option, with local access to the M6 and M6 Toll remaining the same.





• **Option C** would widen the M54 from Junction 1 to the M6, providing extra capacity through an additional traffic lane in each direction. In this scenario, new slip roads would be constructed at M6 junction 10a to provide links to and from the M6 north and the existing hard shoulder would be converted to a fourth traffic lane between M6 junction 10a and 11. M6 junction 11 would be demolished and replaced by a new junction 11 further north, linking to the M6 Toll junction T8. The A460 would cross the M6 on a new bridge, linking in to the A462 and Wolverhampton Road, with a new local road provided to Saredon Road for local destinations north or east.





- 2.4 Any of the options would free up capacity on the A460 and it is understood that a preferred route announcement will be made later this year.
- 2.5 The promoters of the site have held initial discussions with the HE regarding both the implications of the link road and the traffic impact of the development. They have confirmed that they will work closely with us in the development of the schemes and in particular make available their traffic models (and other background data such as ecological assessments and survey work) at the appropriate time to ensure the impacts of the scheme are fully considered and, as necessary, mitigated.

3.0 VEHICLE ACCESS

3.1 The site can currently be accessed either via the M6 J10A/M54 J1 or via the M6 J11 and A460, and will be well placed to benefit from the future M54/M6/M6 (Toll) link road and J11 improvements proposed. Due to the site's beneficial location it is considered highly suitable for substantial high quality employment development



serving both local and strategic markets.

- 3.2 Option A would provide an interchange directly adjacent to the site, and therefore all development traffic would have the opportunity to access the strategic road network via the new link without having to use the A460.
- 3.3 In the event of either Option B or C being progressed, access to/ from the development would be taken from the A460 to the west. The level of flows along the A460 would however be significantly reduced through the new link road scheme (see **Section 6.0**).
- 3.4 Under Option B, M6 Junction 11 would retained for local access to the A460 only and therefore would provide direct access from the site to the M6. This will require a bridge crossing within the site across the link road.
- 3.5 With regard to Option C, M6 Junction 11 would be demolished; however, there would be the opportunity for development traffic travelling to/ from the M6 (north) to route via the M6 (Toll) Junction 8 or via the A460 where base flows will be significantly reduced.

4.0 PUBLIC TRANSPORT STRATEGY

4.1 **Context**

- 4.1.1 Public transport access to new major industrial and warehousing development has evolved over recent years and it is now possible and viable to serve site specific shift change patterns by public transport from wider catchment areas. In this case the site benefits from existing services on key routes and this can be expanded to accommodate other key catchment / demand areas.
- 4.1.2 On that basis, the emerging public transport strategy for the site seeks the following aims:

Direct Aims



- Site Commercial Viability, i.e. that operators on the site are able to recruit sufficient workforce.
- Local Economic Prosperity, i.e. full utilisation of the site to maximise its logistics usefulness to local industry and support their retention and growth, and encourage inward investment to the area.

Indirect Aims

- Economic Fairness and Redistribution, i.e. provide access to employment opportunities for those not able to afford to run a car.
- Social Inclusion, i.e. Provide access to employment for those not able to drive for non-financial reasons, e.g. health condition that prevents holding a driving licence.
- Environmental Impact, i.e. reduce transportation externalities by promoting use of sustainable modes.
- 4.1.3 In terms of specific objectives, the catchment should be considered against the following;
 - (a) Workforce that lives within 60 minutes door-to-door travel time of the site (broadly a 40 minute bus travel time).
 - (b) Number of low-income households within a 10-minute walk of a direct bus service to the site.
 - (c) Preventing highway traffic congestion by attracting potential car users to bus and other sustainable modes – and thus a lower car-driver modal share.

4.2 Site Location and Public Transport Context

4.2.1 A summary of these local bus services is provided in **Table 1** and shown on **Appendix A**. There is scope to further enhance and upgrade these services to meet the needs of end users. This approach has worked successfully at a number of major strategic employments sites including Birch Coppice and Magna Park, where existing routes have been supplemented with shift change public and private services.



No	Route	Frequency & First and Last Services						
No.		Mon - Fri		Sat		Sun		
			4 services per		3 services per			
67	Wolverhampton - Cannock via Shareshill	day		day		-		
07		First	Last	First	Last	-	-	
		08:11	14:41	10:17	14:32	-	-	
	Rugalay Cannada		30 minutes		30 minutes		2 hours	
70/70E	Rugeley - Cannock - Wolverhampton	First	Last	First	Last	First	Last	
		06:02	20:20	07:13	20:20	09:05	17:04	
	- Hednesford - Cannock -		Hourly		Hourly		-	
154	I54 - Wolverhampton	First	Last	First	Last	-	-	
		05:23	23:27	05:23	23:27	-	-	
	Cannock Chase Hospital	Hourly			-		-	
X68	- New Cross Hosptital -	First	Last	-	-	-	-	
	Wolverhampton	07:46	18:46	-	-	-	-	

- 4.2.2 The nearest bus stops are adjacent to the south-west corner of the site along the A460 opposite Church Road. In due course these will be upgraded and as necessary stops provided within the site itself.
- 4.2.3 The nearest railway station is at Landywood, located within 5km to the east of the site. Cannock Railway Station is located approximately 6.5km to the north-east of the site, which is considered to be an appropriate distance from the site due to the good access to bus services along the A460. The site is also located within 1km of a post office.
- 4.2.4 Whilst some employees would need to travel by car, the site offers significant opportunities to improve accessibility to and from the expected employment catchment, including the provision of high quality, site specific, public transport shuttle buses and comprehensive travel planning measures. Such measures have proved very successful on similarly located large scale employment and warehousing developments at significantly reducing the need to travel by car.
- 4.2.5 There are a number of significant industrial and warehouse operators in and around the region who are actively promoting shift change buses to serve the sites. Examples are of these services shown at **Appendix B**. We understand from discussions with the operators (principally Arriva) that provided buses are



running with sufficient patronage, they should be self-supporting and hence sustainable in the long term.

- 4.2.6 For example, Amazon at Rugeley has significant demand and we understand is operating a mode share approaching 60% by bus. It supports services to Birmingham, Walsall and Wolverhampton.
- 4.2.7 I54 has a wide range and successful level of bus services to it. These services penetrate local areas of labour in the Black Country and provide links to Stafford and Cannock. Number 154 runs past the Hilton Park site and provides an established route to and from Stafford and Penkridge to serve the site for early morning shift changes.

4.3 **Employment Distribution**

- 4.3.1 In this case, the site is capable of being well served by high quality public transport along the A460 corridor providing easy access to nearby centres and facilities, and to a large pool of available labour in Cannock, Wolverhampton and other nearby settlements, particularly the Black Country, via existing services.
- 4.3.2 Employment demand from further afield can be also be readily provided with new shift change services. This might include for example a bespoke shift change service to Sandwell in a similar vein to the Rugeley services described above.
- 4.3.3 The South Staffordshire Site Allocations Issues and Options consultation Addendum to the Initial Sustainability Report by AMEC included at section 3.8 a map showing economically deprived areas within South Staffordshire. It is evident from the map that the Hilton Park site is situated within the vicinity of relatively deprived areas - specifically to the north of an area considered to be the most deprived.
- 4.3.4 Therefore, development of the site would offer a range of employment opportunities, around 4,000, to both local communities as well as people from further afield, through both the construction phases and end uses, significantly



benefiting the area.

- 4.3.5 A 30 minute drive time employment catchment area for the site has been identified and is attached as **Appendix C**. The catchment incorporates a number of key potential employment generators, such as Wolverhampton, Walsall, Wednesbury, Lichfield, Stafford and Rugeley. It also covers the Sandwell travel to work area (TWA), which is a deprived area that would benefit from employment opportunities provided by the proposed development.
- 4.3.6 With reference to the existing ONS data for Journey to work patterns within the local area show the following distribution of journey to work trips for employees working in South Staffordshire.

South Staffordshire	37%
Wolverhampton	19%
Cannock Chase	10%
Telford and Wrekin	2%
Walsall	7%
Dudley	10%
Sandwell	2%
Lichfield	2%
Birmingham	2%
Stafford	8%
Total	100%

Table 2 - 2011	Census – Employee	Distribution
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- 4.3.7 Based on the above, more than 60% of the broad home place locations (South Staffs, Wolverhampton and Cannock) are already served by public transport corridors.
- 4.3.8 Further investment in routes to the south to Walsall, Dudley, Sandwell could increase this to <u>85%</u>.



4.4 Likely Catchment and Potential Bus Services

- 4.4.1 It is generally expected that the shift change times for frontline operational staff would follow the standard three-shift pattern for 24-hour working, i.e. 6am-2pm, 2pm-10pm and 10pm-6am; some occupiers might run a two-shift pattern, e.g. 7am-7pm and 7pm-7am or their own variants of that. There would be management and administration staff on-site: these are expected to work typically between 8.30am and 5pm.
- 4.4.2 Bespoke bus services could be tailored to shift change times, which could vary between site uses and across the year; seasonal variations in shift patterns are typical for logistics operations.
- 4.4.3 Based on the above, it is likely that demand for services could be either;

Wolverhampton – Cannock Corridor – Service Enhancements on existing routes. Site – Sandwell / Dudley – new site specific shift change route.

4.4.4 The movement corridors which these relate to are shown on **Appendix D**.

5.0 AIR QUALITY MANAGEMENT AREA

- 5.1 The site is not within an Air Quality Management Zone (AQMA). The closest AQMA to the site is located along the A460 through Featherstone to the immediate southwest of the site. An extract showing this AQMA is attached as **Appendix E**.
- 5.2 With the link road in place, flows on this section will decrease significantly and for Options A and B, the development will not generate any material change in flows on this section.



6.0 TRIP GENERATION

- 6.1 Based on experience at other similar sites in the country, it has been estimated at this stage that the proposed development could generate in the order of:
 - 300-500 two-way vehicle trips during the respective peaks, of which approximately 70-100 would be HGVs; and
 - 5,000-7,000 two-way vehicle movements over a 24 hour period, of which approximately 1,500-2,000 would be HGVs.
- 6.2 The level of flows along the A460 would be significantly reduced through a new link road scheme (estimated to be a reduction of around 14,000 two-way movements per day). Within this context the impact of an additional 5,000 7,000 two-way movements generated by the proposals still provides a significant betterment over the existing situation.
- 6.3 The promotors have held initial discussions with HE regarding both the implications of the link road and the traffic impact of the development. They have confirmed that they will work closely with us in the development of both schemes and in particular make available their traffic models at the appropriate time to ensure the impacts of the scheme are fully considered and, as necessary, mitigated.

7.0 PARKING

- 7.1 Car parking on site would be provided in line with local parking standards contained within the South Staffordshire Core Strategy DPD (2011), which are as follows:
 - B2 Industry: 1 space per 25 sq.m. up to 250 sq.m., then 1 space per 50 sq.m. (all gross floor space); and
 - B8 Warehouses: 1 space per 80 sq.m. gross floor space.



- 7.2 With regard to cycle parking provision, the local standards are as follows:
 - B2 General Industrial: 1 space per 500 sq.m; and
 - B8 Storage and Distribution: 1 space per 1,000 sq.m.
- 7.3 Cycle storage would be located close to the entrance of the buildings in secure, light and convenient locations.

8.0 CONCLUSIONS

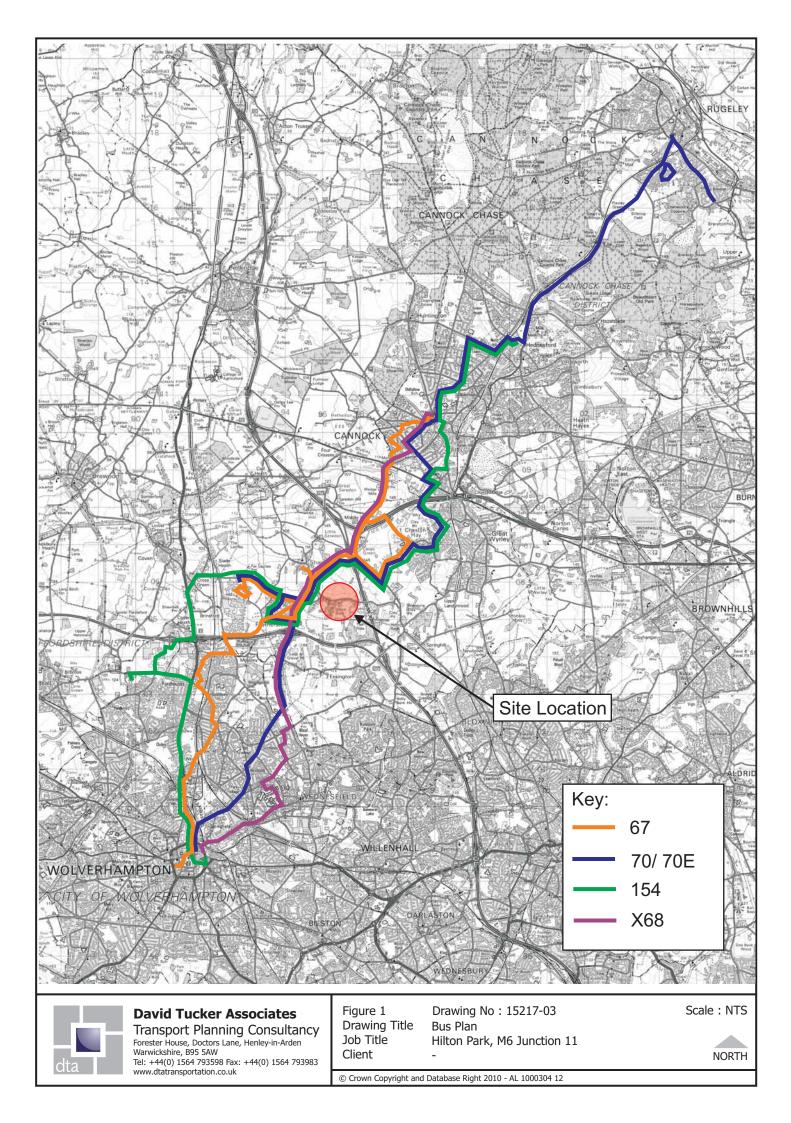
- A new link between the M54, M6 North and M6 (Toll) is being promoted by Highways England for which three options are being considered. Any of the options would free up capacity on the A460 and it is understood that a preferred route announcement will be made in the Autumn of 2017;
- In the event of Option A being progressed, which would provide an interchange directly adjacent to the site, all development traffic would have the opportunity to access the strategic road network via the new link without having to use the A460. In the event of either Option B or C being progressed, access to/ from the development would be taken from the A460 to the west. The level of flows along the A460 would however be significantly reduced through the new link road scheme;
- Initial discussions have been held with Highways England regarding both the implications of a new link road and the traffic impact of the proposed development. These discussions are ongoing.
- With regard to accessibility, whilst some employees would need to travel to/ from the proposed development by car, the site offers significant opportunities to improve accessibility, including the provision of high quality, site specific, public transport shuttle buses and comprehensive travel planning measures. Such measures have proved very successful on similarly located large scale warehousing developments at significantly reducing the need to travel by car;



and

• The site is ideally located to serve a number of key employment generators, including the Sandwell TWA which is a deprived area that would clearly benefit from employment opportunities provided by the proposed development.

Appendix A



Appendix B

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midlands/)

(/west-

HOME (/WEST-MIDLANDS/) // INFORMATION (/WEST-MIDLANDS/INFORMATION)

Buses to i54 South Staffordshire

Like 0 G+1 0

i54 South Staffordshire (http://www.i54southstaffordshire.co.uk/preview/previewi54home.html) is a high-tech business park close to Junction 2 of the M54 at Wobaston Road, Pendeford, on the boundary of South Staffordshire and Wolverhampton.

Getting to i54 South Staffordshire is easy by bus with fast and frequent services from many parts of Wolverhampton.

From Wolverhampton city centre & bus station (next to Wolverhampton Rail Station):

- Services 54 (http://nxbus.co.uk/routes/west-midlands/B054n) & 154 offer the quickest route between the i54 site and Wolverhampton City Centre
- In addition services 6 (http://nxbus.co.uk/routes/west-midlands/B006v/) & 6A (http://nxbus.co.uk/routes/west-midlands/B006Av/) offer a frequent service throughout the day Monday to Saturday to & from i54 and Wolverhampton city centre/bus station.

If you are travelling by The Metro (http://nxbus.co.uk/the-metro/), alight at Wolverhampton St. George's and catch the 6, 6A, 54 or 154 from Wolverhampton city centre to i54.

Improvements from 26th April 2015:

- National Express West Midlands now provides exciting new links from Wolverhampton to Stafford (service 54) and from Wolverhampton to Cannock and Hednesford (service 154). The new 54 and 154 will replace the existing 54 between Wolverhampton and Bilbrook. The extended 4 will replace the 54 between i54 and Bilbrook.
- The 54 runs hourly between Wolverhampton and Stafford via Stafford Road, Pendeford Business Park, i54, Coven and Penkridge. Buses run hourly from early until late on Monday to Saturday daytimes.
- The **154** runs hourly between Wolverhampton, Cannock and Hednesford via Stafford Road, Pendeford Business Park, i54, Featherstone and Cheslyn Hay. Buses run hourly from early until late on Monday to Saturday daytimes.
- Between Wolverhampton, Pendeford Business Park and i54, the 54 and 154 combine to run every 30 minutes throughout the day with extra buses at peak times.
- Our normal range of Daysaver tickets will be available to use and purchase on both services. Regional National Express Travelcards will be valid throughout on the 54 and 154. Black Country National Express Travelcards will be valid throughout the route of the 154 but only between Wolverhampton and Coven on the 54.

From:	Service:	Mon -Fri peak frequency	Mon-Fri daytime frequency	Saturday daytime frequency	Sunday daytime frequency	Daily evening frequency	Journey time
Bilbrook Rail Stn	4	every 30 mins	every 30 mins	every 30 mins	N/A	every 30 mins (not Sundays)	8-10 mins
Bilston Bus Stn	25	every 30 mins	every 30 mins	every 30 mins	N/A	N/A	51 mins
Blakeley Green	6, 6A	every 10 mins	every 10 mins	every 10-15 mins	every 30 mins	every 30 mins	13-17 mins
Low Hill	25	every 30 mins	every 30 mins	every 30 mins	N/A	N/A	10 mins
Oxley	54, 154	every 15-30 mins	every 30 mins	every 30 mins	N/A	every 30 mins (not Sundays)	6 mins
Pendeford (Whitburn Close)	6, 6A	every 10 mins	every 10 mins	every 10-15 mins	every 30 mins	every 30 mins	4-8 mins
The Scotlands	25	every 30 mins	every 30 mins	every 30 mins	N/A	N/A	16 mins
Wednesfield	25	every 30 mins	every 30 mins	every 30 mins	N/A	N/A	25 mins
Whitmore Reans	6, 6A	every 10 mins	every 10 mins	every 10-15 mins	every 30 mins	every 30 mins	20-24 mins

Getting to i54 South Staffordshire

Buses to i54 South Staffordshire | National Express West Midlands

Willenhall	25	every 30 mins	every 30 mins	every 30 mins	N/A	N/A	38 mins
Wobaston (Patshu ll Avenue)	6, 6A	every 10 mins	every 10 mins	every 10-15 mins	every 30 mins	every 30 mins	3 mins
Wolverhampton City Centre	54, 154	every 15-30 mins	every 30 mins	every 30 mins	N/A	every 30 mins (not Sundays)	17 mins
		every 10 mins	every 10 mins	every 10-15 mins		every 30 mins	
	6, 6A				every 30 mins		34-38 mins

We have a great range of value for money ticket options for commuters, including tickets which can be used on The Metro, these are shown below:

ay tickets & single fares			
Adult Regional Daysaver	Unlimited travel for 1 day on National Express West Midlands and National Express Coventry buses.		only £4.60
	Buy it from the driver!		
Adult Day Metro/Bus	Valid on The Metro, our buses and most other operators buses throughout the West Midlands		£6.50
Adult Single Fare	- Short Hop (1-2 Stages) - Max Single Fare (3+ Stages) Staffordshire Fares apply on routes 54 & 154		£1.50 (off - peak) £2.40
avelcards			
Adult Black Country Faresaver	All our buses in the Black Country All day long	1 week 4 week	£15.70 £54.50
		Monthly Direct Debit	under £1.70 per day
Adult Regional	All National Express West	1 week	£17.50
Fravelcard	Midlands & National Express	4 week	£62.50
	Coventry buses All day long	Monthly Direct Debit	under £2 per day
Adult Regional	All National Express West	1 week	£25
Travelcard with Metro	Midlands & National Express Coventry buses & METRO	4 week	£86.80
	All day long	Monthly Direct Debit	£74.35
Adult Earlybird	Valid from 04:00 to 09:29 Monday-Fridays excluding	4 week	£31.25
	Bank Holidays on National Express West Midlands & National Express Coventry buses.	Monthly Direct Debit	£28.25
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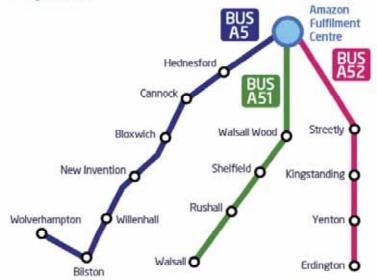
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Cannock Bus Station	0709 1819	3
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New Invention opp Shopping Centre	0626	1926
Willenhall The Dale	0633	1933
Bilston Mount Pleasent	0639	1939
Wolverhampton Pipers Row	0649	1949



Walsall to Rugeley Amazon via Rushall & Walsall Wood

Walsali Hatherton Road Rushali Library Shelfield Co-op Walsali Wood opp shopping centre Rugelcy Amazon



Rugeley Amazon to Walsall via Walsall Wood & Rushall

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Walsall Wood opp shopping centre	
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Rushall Library	
Walsall Hatherton Road	



Erdington to Rugeley Amazor Beggars Bush, Kingstanding & Streetly

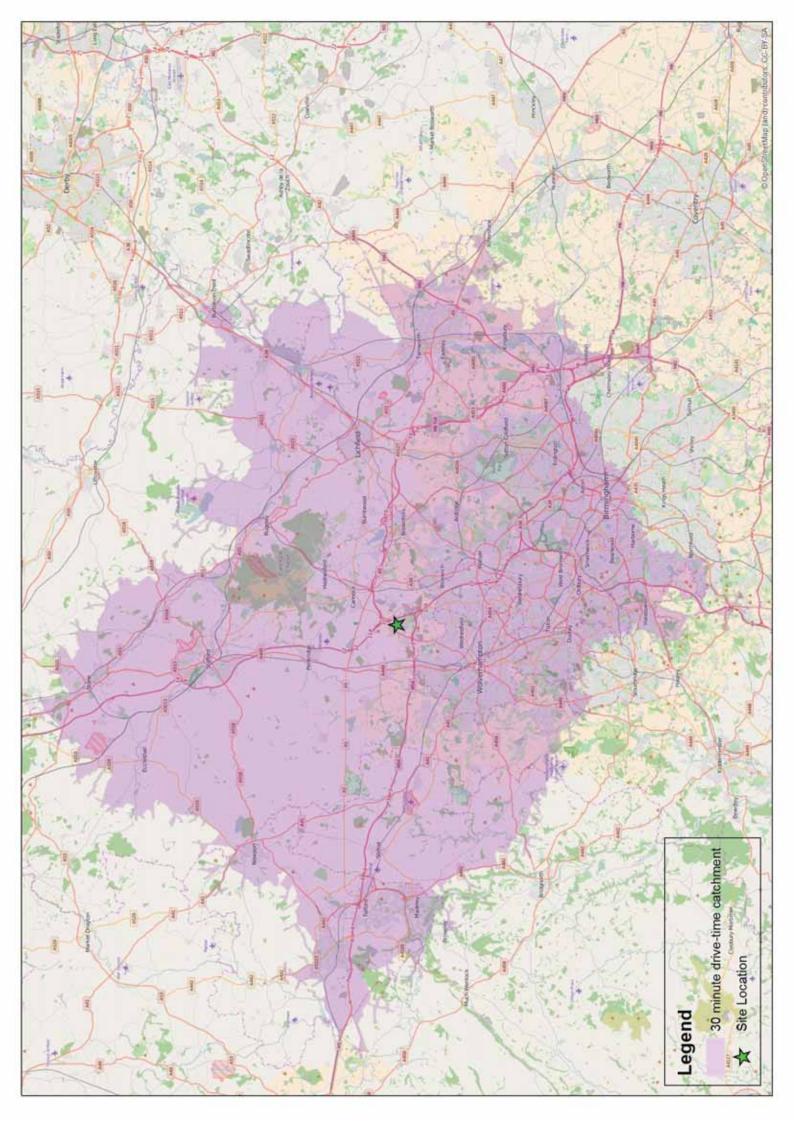
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The Yenton	
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Beggars Bush	
Kingstanding Circle	
Streetly Hardwick Arms	
Shire Oak Cross Roads	
Rugeley, Amazon	



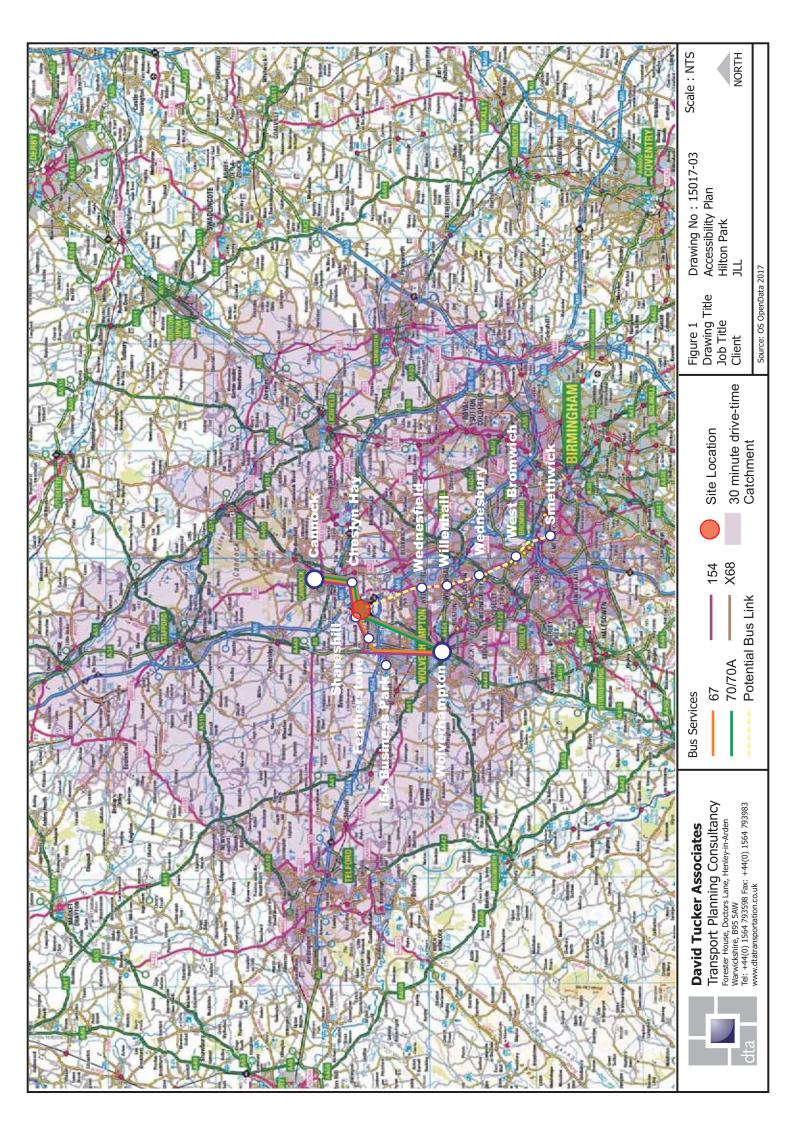
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Beggars Bush
Boldmere Highbridge Road
The Yenton
Erdington Six Ways

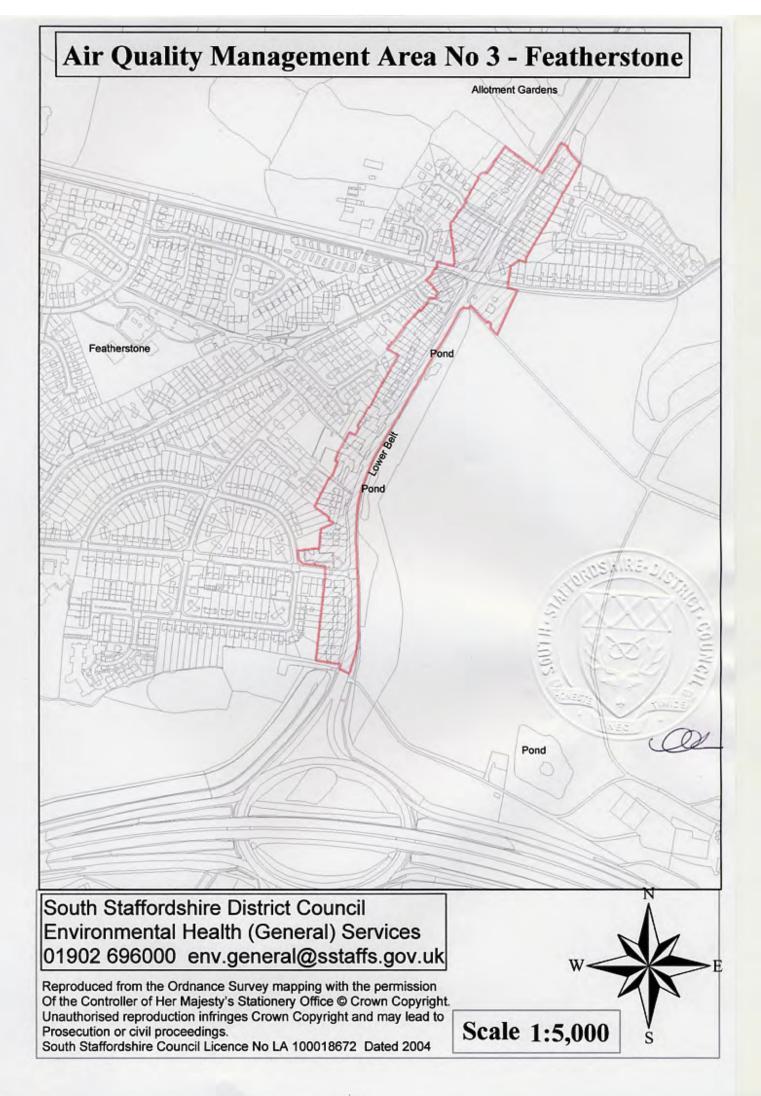
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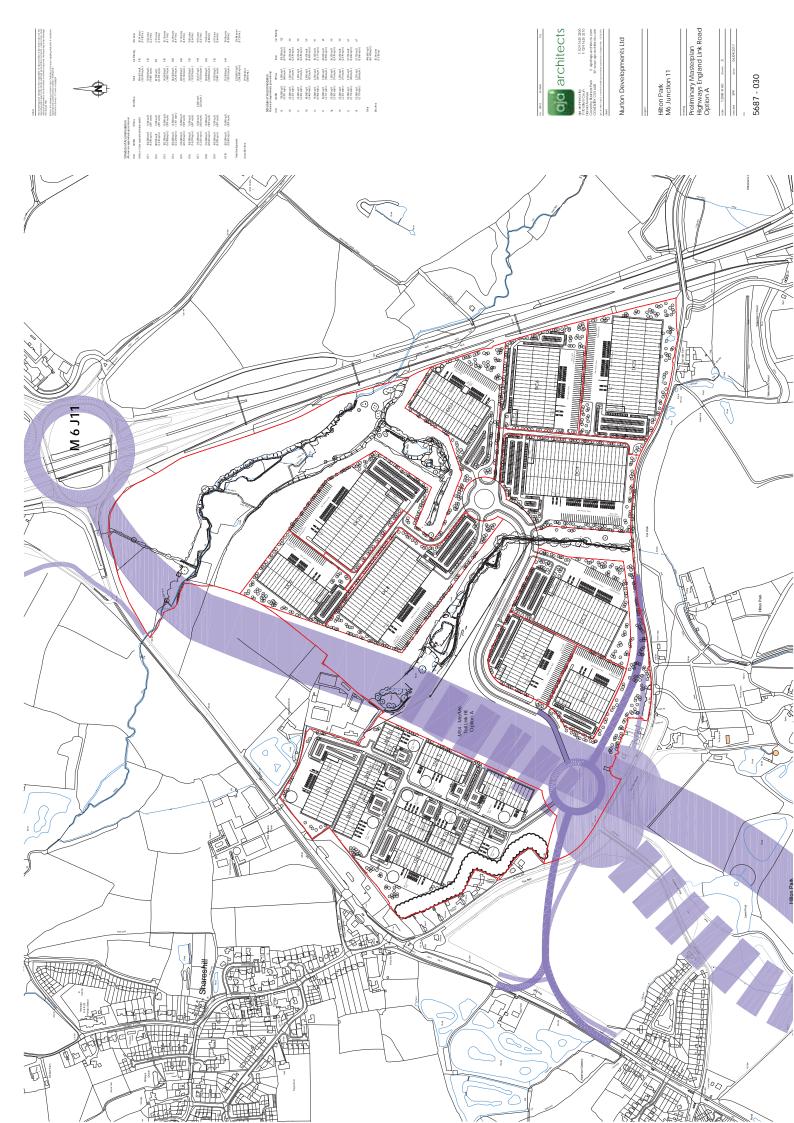


Appendix D

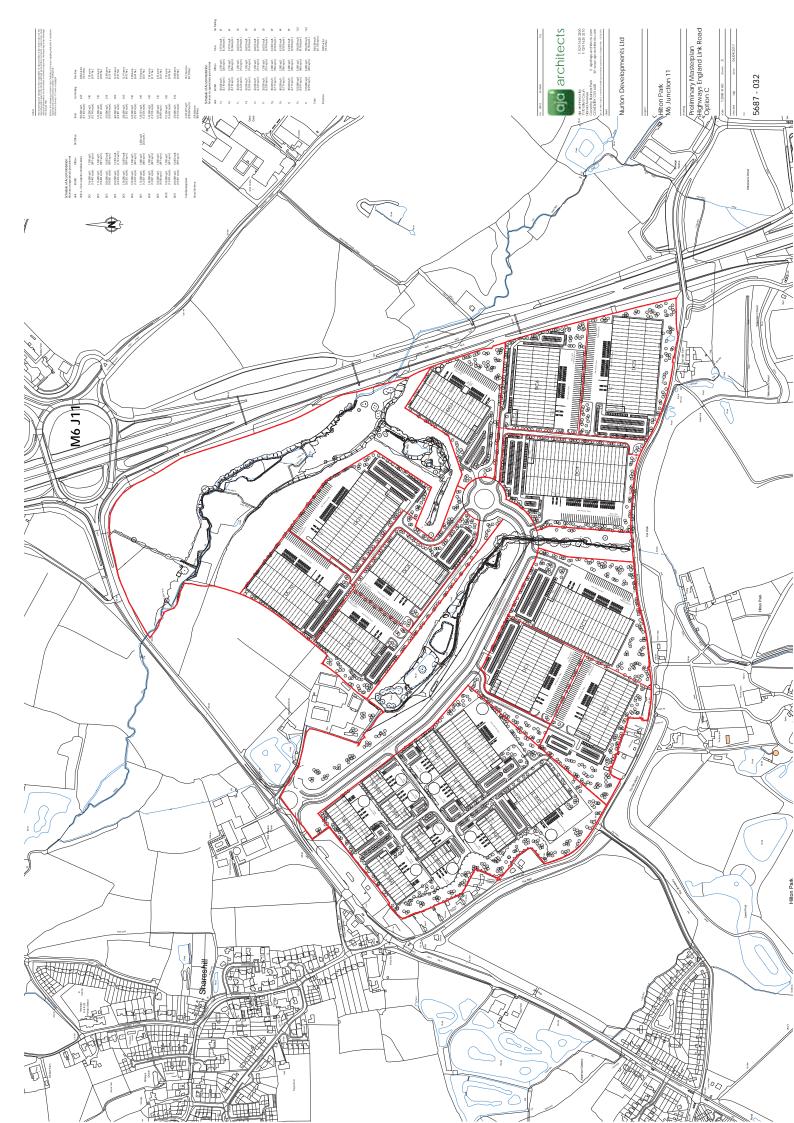


Appendix E









10 February 2016

Land at Hilton Park, M6 Junction 11

Green Belt Review

Report Number:10246_R01b_RH_LWAuthor:Robert Hughes CMLIChecked:Ben Gurney LMLI





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Land at Hilton Park, M6 Junction 11 Green Belt Review

10246_R01b_10 February 2016_RH_LP

Executive Summary

Scope and Purpose

- S1 Tyler Grange have been appointed by Nurton Developments (Hilton) Limited to undertake a review of the contribution that land at Hilton Park, adjacent to M6 Junction 11 makes to the function and purposes of the Green Belt. The land at Hilton Park is being promoted as a potential Strategic Employment Site (SES) as part of the South Staffordshire Site Allocation Document (SAD) Preferred Options Consultation.
- S2 The South Staffordshire Core Strategy (Policy C7) allows for "modest extensions" to the four existing freestanding Strategic Employment Sites (SES's) at: i54; ROF Featherstone; Four Ashes; and Hilton Cross. As all of these sites are set within the Green Belt, any extensions would require the release of land from the Green Belt and re-drawing of Green Belt boundaries.
- S3 Within the Preferred Options SAD, it is proposed that land for additional employment development is released from the Green Belt at the i54 and ROF Featherstone SES's. The proposed releases are informed by the findings of the Council's Green Belt Review (the South Staffordshire Partial Green Belt Review Method Statement, January 2014).
- S4 The land at Hilton Park has not been the subject of a Green Belt Review by South Staffordshire District Council. In line with the Core Strategy, the Council has limited its consideration to extension to the four existing freestanding SES's. Therefore, in order to enable a comparison to be drawn between the site at Hilton Park and other SES's, Tyler Grange have undertaken a Green Belt Review that assesses the contribution that the site makes to the Green Belt. The Review also considers how land at Hilton Park could be released from the Green Belt to ensure that a defensible new Green Belt boundary is achieved.

Findings of Green Belt Review

- S5 The assessment divided land at Hilton Park which is defined by the M6, A460 and Hilton Lane into 8 individual land parcels. This has allowed for consideration of variations in land use, location in relation to settlements and boundaries.
- S6 As with the Council's Green Belt Review, parcels were scored as making a 'Significant Contribution', 'Contribution' or 'More Limited Contribution' to the Green Belt.

Overall Contribution to Green Belt

- S7 None of the parcels were assessed as making a 'Significant Contribution' to the Green Belt. The land at Hilton Park has been assessed as making an overall 'Contribution' to the Green Belt for all of the parcels. This reflects the findings for each parcel containing at least one purpose which has been assessed as making a 'Contribution', and does not relate to all purposes for each parcel.
- S8 The area is separated from neighbouring settlement and contained by a number of significant boundaries, including the M6 motorway, A460 (Cannock Road), Hilton Lane, tree belts and woodland. The influence of adjacent urban influences, ribbon development and main roads place the area within an urban fringe location, reducing the contribution that it makes to safeguarding the countryside from encroachment
- S9 The findings of the assessment relating to each of the five Green Belt purposes are summarised below.



To check the unrestricted sprawl of large built-up areas

- S10 All of the parcels were assessed as making 'More Limited Contribution' (the lowest possible score) when considered in relation to their proximity to urban or industrial areas. The land at Hilton Park is separated from Shareshill by the A460.
- S11 Existing ribbon development along Hilton Lane and the A460 introduce sprawl extending from Shareshill. Parcels to the south and west of the site bounding these roads have been assessed as making a 'Contribution' to this purpose.

To prevent neighbouring towns merging into one another

- S12 Although the site is situated within close proximity to Shareshill on its western edge, the A460 and ribbon development serve to limit parcels to the west of the area as making a 'Contribution' to this purpose. Parcels to the east that are more distant from Shareshill were assessed as making a 'More Limited Contribution'.
- S13 Roads, woodland and tree belts bounding the site and within the adjacent area serve to limit the potential for the physical or visual merging of settlements. The site has been assessed as making a 'More Limited Contribution' to this criterion.

To assist in safeguarding the countryside from encroachment

- S14 The roads bounding the wider Site area provide robust, defensible boundaries and limit the potential for encroachment into the wider countryside.
- S15 The presence of adjacent settlement and major road infrastructure influences the tranquillity, rurality and character of the Site and surrounding area. This serves to limit the contribution that all parcels make when assessed against the significance of existing urbanising influences and development. This has resulted in an assessment of making a 'Contribution' for all parcels.

To preserve the setting and special character of historic towns

- S16 None of the parcels have been assessed as making greater than a 'More Limited Contribution' to this purpose. None of the parcels are situated within or adjacent to a historic town or settlement containing a Conservation Area, nor facilitate recognised important views to or from a Conservation Area.
- S17 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- S18 This purpose was not assessed, as it is considered that all land within the Green Belt performs this function equally.

Conclusions

Comparative Assessment of Strategic Employment Sites

S19 When compared with the findings of the Council's assessment of the Strategic Employment Sites, land at Hilton Park has been assessed as making the same overall contribution to the Green Belt as land at the i54 and ROF Featherstone sites that are proposed for release within the Preferred Options Consultation SAD.



- S20 This assessment is supported by the Council's Review identifying factors that are shared between the three sites. These include the separation from nearby settlements by roads, motorways and railways, and urbanising influences limiting the contribution the land makes to safeguarding the countryside from encroachment.
- S21 Land west of Hilton Cross has been assessed by the Council as making a 'Considerable Contribution' to the Green Belt due to potential sprawl, merging and encroachment into the countryside. Land to the east of Hilton Cross has been assessed as making a 'Contribution', due to the distance with Wolverhampton and potential for encroachment into the Countryside.
- S22 Land to the west of Four Ashes has been assessed by the Council as making a 'Considerable Contribution' to the Green Belt due to potential to facilitate sprawl and encroachment on the countryside. Other parcels have been assessed as making a 'Contribution' or 'More limited Contribution' due to their containment and separation.
- S23 The Council's assessment of the SES's includes some land parcels that are identified as making an overall 'Limited Contribution' to the Green Belt, despite some of the criteria being scored as ++ out of a possible +++. Using the methodology employed by Tyler Grange, the scoring of any one criteria as ++ would default to the parcel making a 'Contribution'. This provides a consistent and transparent assessment. There may therefore be some parcels at Hilton Park assessed as making an overall 'Contribution' that perform similarly to those at other SES's that were assessed as only making a 'Limited Contribution'. These may include performance in relation to the potential to prevent ribbon development, proximity to settlements and safeguarding the countryside from encroachment. The lack of transparency and consistency in the Council's assessment does not allow for a true like-for-like comparison to be made.

Release of Land from the Green Belt and Re-drawing of Green Belt Boundaries

- S24 The existing infrastructure, including connections with the M6 Junction 11, A460 and potential for the M54-M6/M6 toll link road to pass through the site area, combined with accessibility to the Pentalver rail freight terminal at Cannock and employment opportunities for local workers combine to provide a sustainable location for growth at Hilton Park.
- S25 There are also opportunities for development of the Site to limit impacts on the environmental dimension of sustainability through the retention of woodland, tree belts and riparian vegetation along watercourses. Biodiversity enhancements may also be provided through SUDS and provision of open spaces managed for wildlife benefits. There are also opportunities to enhance public access and amenity within the site whilst limiting landscape and visual impacts of development on the surrounding area through the use of structure planting to boundaries and siting of development on the site.
- S26 Having regard to these requirements as set-out at paragraph 85 of the NPPF, the existing roads bounding the land at Hilton Park provide recognisable, permanent boundaries that could clearly and robustly define the release of land from the Green Belt. There are opportunities to enhance existing tree belt and woodland planting to site boundaries along these roads to further strengthen the boundaries, containing the area both physically and visually and reducing impacts associated with the proximity to Shareshill and properties along Hilton Lane.



Section 1: Introduction: Scope and Purpose

- 1.1 Tyler Grange have been appointed by Nurton Developments (Hilton) Limited to undertake a review of the contribution that land at Hilton Park adjacent to M6 Junction 11 (the Site) makes to the function and purposes of the Green Belt. The area assessed also includes a parcel of land outside that controlled by Nurton Developments at Brookfield Farm that adjoins the Site to the west and is contained within the boundary formed by the A460. The location and extent of the land is illustrated on Plan 1 Site Location and Photoviewpoint Locations.
- 1.2 The Site is being promoted as a potential Strategic Employment Site (SES) as part of the South Staffordshire Site Allocations Document (SAD) Preferred Options Consultation. The review contained within this report forms part of representations to the SAD consultation.
- 1.3 In order for the Site at Hilton Park to be developed, it would need to be removed from the Green Belt. The Site has not been subject to a Green Belt Review by South Staffordshire District Council (the Council). In line with the adopted Core Strategy, the Council has limited its consideration to extensions to existing SES in the District (i54, Hilton Cross, ROF Featherstone and Four Ashes).
- 1.4 To enable a comparison to be drawn between the Site and other SES's, Tyler Grange have undertaken a Green Belt Review that assesses the contribution that at the Site makes to the Green Belt. Consideration is also given to how the land may be released from the Green Belt to ensure that a clearly defined, defensible new Green Belt boundary is achieved in the long term and that the development on the Site would reflect the requirement of the NPPF for the need to promote sustainable patterns of development (NPPF paragraph 84).
- 1.5 Consideration of the local and regional need for additional SES's to come forwards, and the Very Special or Exceptional Circumstances that may justify release of such sites from the Green Belt are considered separately in representations prepared by Jones Lang LaSalle (JLL).

Background Context

Local Plan Evidence Base

1.6 As part of the evidence base for the Local Plan, South Staffordshire Council commissioned LUC to undertake a partial Green Belt Review of Main and Local Service Village and the four freestanding SES's within South Staffordshire. The *'South Staffordshire Partial Green Belt Review Method Statement'* (the Council's Green Belt Review) was published in January 2014.

Core Policy

- 1.7 The South Staffordshire Core Strategy Development Plan Document, adopted 11th December 2012 allows for "modest extensions" to the four existing freestanding SES sites at i54, Hilton Cross, ROF Featherstone and Four Ashes to accommodate justified development needs based on robust evidence (*Core Policy 7 'Employment and Economic Development'*).
- 1.8 The existing sites are inset within the Green Belt. Any future extensions to these will require the release of Green Belt land.
- 1.9 Core Policy 7 states that the Council expect employment development to contribute to the achievement of sustainable development, being: situated within sustainable locations that are not



of high environmental value; accessible by public transport, walking and cycling; and are of an appropriate scale and design to the location for which it is proposed.

Site Allocations Document

- 1.10 The South Staffordshire Site Allocations Document (SAD) Preferred Options Consultation, December 2015 proposes that additional employment land at i54 and ROF Featherstone is released from the Green Belt order to facilitate extensions to these SES's.
- 1.11 *Policy SAD6: 'The Preferred Option Employment Land Allocations'* identifies a total of 62 hectares of employment land for release, including: 40 hectares on land to the west of i54; and an additional release of 12 hectares on land east and west of ROF Featherstone.
- 1.12 An extract from the Preferred Options Consultation SAD including Policy SAD6, supporting text and a map showing the location of the proposed employment allocation areas to be removed from the Green Belt is included at **Appendix 1**.
- 1.13 The delivery of employment land at ROF Featherstone is *"support in principle, subject to further evidence and the delivery of a new access road".* This reflects issues surrounding the deliverability of the site and the reliance of ROF Featherstone upon a new access road.
- 1.14 The proposed releases are informed by the findings of the Council's Green Belt Review. Whilst land at i54 and east of ROF Featherstone was assessed by LUC as 'Making a contribution to Green Belt purposes', none of the parcels were considered to make a 'considerable contribution' to any one of the five Green Belt purposes individually, and were therefore assessed for their overall contribution against the full range of purposes.
- 1.15 The Council's Green Belt Review, its methodology and findings are considered in more detail within this report.

Future Releases

1.16 When considering other employment sites in South Staffordshire, the supporting text to Policy SAD6 states that employment land will be considered further in accordance with *Policy SAD1: 'The Local Plan Review'*. Policy SAD1 commits to an early or partial review of the South Staffordshire Local Plan in order to address the need to work collaboratively with other authorities to meet Birmingham's housing shortfall.

Structure of Report

- 1.17 In order to enable a comparison to be made between the Site at Hilton Park and the other SES's at i54, ROF Featherstone, Hilton Cross and Four Ashes, Tyler Grange have undertaken a Green Belt Review of the Site and the contribution that it makes to the purposes of the Green Belt. This has sought to use the same methodology as that employed by LUC within the Council's Green Belt Review so that a fair comparison between sites can be made.
- 1.18 Tyler Grange's Green Belt Review of the land at the Hilton Park Site is presented within this report and comprises the following stages:

Review of Methodology employed by the South Staffordshire Partial Green Belt Review (Section 2)

1.19 As set-out in Section 2 of this report, the Council's Green Belt Review takes the correct approach by considering individual parcels of land against the Green Belt purposes using a set of defined



criteria, and limiting consideration to only Green Belt matters. The Council's Review does not seek to define allocations or make recommendations as to the release of land or the subsequent development potential of parcels. Land parcels have been defined by robust boundaries surrounding areas of the same or similar land use or character. Boundaries included roads, railways, watercourses, woodland, hedgerows and tree-lines.

1.20 However, despite the above, the parameters employed by the Review when scoring parcels against the criteria do not allow for a balanced weighting to be applied to each purpose when ranking parcels. Furthermore, the assessment contained within the Review does not provide a full explanation of the judgements made in all cases.

Revised Criteria and Parameters (Section 3)

1.21 In light of the issues identified with the transparency and weighting of the assessment undertaken within the Council's Green Belt Review, Tyler Grange have refined some of the criteria to provide greater clarity, as well as introducing additional scoring parameters to enable a more thorough and balanced assessment of the contribution a parcel makes to each Green Belt purpose.

Hilton Park, M6 Junction 11 Green Belt Assessment (Section 4)

Definition of Land Parcels

- 1.22 As with the Council's Green Belt Assessment, the Site has been divided into parcels defined by character, land use, landform and robust boundaries, including: roads, tree belts, watercourses, woodland and hedgerows.
- 1.23 A parcel of land outside that controlled by Nurton Developments (Hilton) Ltd at Brookfield Farm (Parcel 8) has also been included within the assessment. This parcel adjoins the Site and is contained within the boundary formed by the A460 to the west that provides separation from Shareshill and the adjacent countryside.

Green Belt Assessment

- 1.24 Assessment of the contribution of each Parcel to the purposes of the Green Belt, using the refined criteria and parameters.
- 1.25 The assessment makes reference to supporting information (aerial photography plans and photoviews) where applicable and provides a full justification for the assumptions made within the assessment).

Comparative Assessment (Section 5)

- 1.26 Having undertaken an assessment of the contribution that the Site and its constituent land parcels make to the Green Belt purposes, the findings have been compared to those of the Council's Green Belt Review for the four existing freestanding strategic employment sites. This allows for an understanding of the relative contribution of the land at Hilton Park and its viability for release, based upon its importance to the Green Belt and performance in relation to other strategic employment sites within South Staffordshire.
- 1.27 The comparative assessment forms part of the evidence to support the promotion of the land at Hilton Park, combined with other factors, including sustainability (e.g. proximity to the transport network, landscape sensitivity and biodiversity considerations), deliverability of sites and identified need for employment and at both the sub regional and region level.



Consideration of Release from the Green Belt (Section 6)

- 1.28 Having assessed the contribution that land at Hilton Park makes to the purposes of the Green Belt, this section draws together the findings of the assessment to establish the following:
 - How the development of land at Hilton Park, M6 Junction 11 for employment uses may best respond to the Green Belt context; and
 - Make recommendations as to how the Site and adjacent land lying within an area defined and contained by the M56 Motorway, A460 and Hilton Lane may be released from the Green Belt within the emerging South Staffordshire Local Plan SAD.



Section 2: Review of Methodology employed by the South Staffordshire Partial Green Belt Review

2.1 Prior to undertaking an assessment of the contribution that land at the Hilton Park Site makes to the purposes of the Green Belt, and in order to ensure that a comparative review can be made with the other four SES's within South Staffordshire, the approach and methodology employed by LUC within the 'South Staffordshire Partial Green Belt Review Method Statement', September 2014 has been reviewed. Where any issues have been identified, these are highlighted below.

Scope and Purpose

2.2 The Partial Green Belt Review undertaken by LUC for the Council forms part of the Local Plan Evidence Base to inform the decision making and appraisal process of potential development sites in the Green Belt, and was prepared in order to:

"…assist in ensuring that the best sites are identified for future development and that options for a revised Green Belt boundary are identified which will be defensible and long lasting¹"

- 2.3 In recognition of Core Strategy Policy C7 that allows for modest extensions to the four SESs at i54, ROF Featherstone, Hilton Cross and Four Ashes, parcels of land within the Green Belt around these four sites were also included in the Review. These were in addition to land parcels around the main and local service villages.
- 2.4 The Green Belt Review is limited to identifying the relative performance of parcels against Green Belt purposes, and does not seek to recommend which sites are released from the Green Belt, define new site allocations or new settlement boundaries. The Review acknowledges that the contribution land makes to the function and purposes of the Green Belt is not necessarily an indication of whether land is suitable for development and that even areas identified as playing an important Green Belt function may be subject to further consideration. Other non-Green Belt issues identified include landscape character and wider sustainability issues.²
- 2.5 The Review therefore recognises that when identifying land for release from the Green Belt, Councils should take account of the need to promote sustainable patterns of development (NPPF paragraph 84) and ensure consistency with the Local Plan for meeting identified requirements for sustainable development (NPPF paragraph 85).

Definition of Land Parcels

- 2.6 When identifying parcels of Green Belt land to consider within the assessment, the Council's Green Belt Review undertook a "first sieve" of sites using constraints mapping and did not consider land constrained by the following:
 - Sites of Scientific Interest;

¹ South Staffordshire Partial Green Belt Review, January 2014: paragraph 2.14, page 4 ² South Staffordshire Partial Green Belt Review, January 2014: paragraph 1.4, page 2



- Scheduled Monuments;
- Registered Parks and Gardens; and
- Areas at high risk of flooding (Flood Zone 3b).
- 2.7 Whilst these constraints may identify a number of areas that may be unsuitable for development, the presence of Scheduled Monuments does not necessarily indicate that there is no capacity for some development. There may be the possibility for such areas to incorporate development that respects the setting and significance of any heritage assets that are present.

Boundaries to Parcels

- 2.8 Land parcels were defined by robust boundaries, including roads, railways, watercourses, hedges and tree-lines surrounding areas of the same or similar land use or character.
- 2.9 The Review considers major roads (Motorways and A Roads) as being defensible boundaries beyond which development would be isolated from existing settlements. This was used to limit the identification of parcels beyond such roads bordering settlements when identifying parcels around them.
- 2.10 This definition relates to boundaries to settlements, as opposed to the extensions to employment sites. The four SESs are inset within the Green Belt and do not adjoining settlement edges, either with major roads separating them (i54 and ROF Featherstone) or being situated away from settlement edges (Four Ashes and Hilton Cross).

Identification of Land Parcel's around Strategic Employment Sites

- 2.11 When defining parcels around the SES's, the Review identified larger parcels that were considered to be 'modest extensions' based on the size of the current employment sites. There is no further justification provided. Parcels were defined by robust boundaries.
- 2.12 Having reviewed the maps for each of the employment sites contained within the Review, it would appear that there are no constraints around any of the sites that have influenced the selection and definition of land parcels for assessment.
- 2.13 It is noted that there are a number of parcels surrounding the employment sites that are defined by areas of woodland. The definition of parcels by woodland edges is appropriate and relates to the requirement for new Green Belt boundaries to be defined by physical features that are readily recognisable and likely to be permanent (NPPF paragraph 85). This is recognised by the Green Belt Review where it is stated that:

"The Core Strategy stipulates that new settlement boundaries should be clearly defined using 'readily recognisable features such as roads, streams, belts of trees or wood edges where possible'. Such recognisable features were used to define appropriate parcels of Green Belt land on the edge of the built environment for review in this study."³

2.14 However, although woodland is used to define parcels of land, the Green Belt Review is contradictory to the above when considering whether woodland is a defensible boundary, stating the following when setting-out the methodology for identifying land parcels:

³ South Staffordshire Partial Green Belt Review, January 2014: paragraph 1.4, page 2



*"Woodland was considered a robust boundary not a defensible boundary, i.e. woodland has been used to help define the edge of parcels but woodland adjoining the settlement edge has not been considered so defensible as to not be assessed against the Green Belt purposes"*⁴:

2.15 In the case of the employment sites considered, whilst some parcels do include woodland, there are large areas of woodland adjacent to the sites that have not been assessed.

Assessment Criteria

- 2.16 Having defined the land parcels, the Council's Green Belt Review sets-out a number of Assessment Criteria that are used to assess the performance of each parcel of land. These are identified for each of the five Green Belt purposes as set-out at paragraph 80 of the NPPF, namely:
 - 1 to check the unrestricted sprawl of large built-up areas;
 - 2 to prevent neighbouring towns merging into one another;
 - 3 to assist in safeguarding the countryside from encroachment;
 - 4 to preserve the setting and special character of historic towns; and
 - 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.17 A copy of the criteria used by the Council's Green Belt Review when assessing the performance of each parcel of land against the purposes of the Green Belt is included at **Appendix 2**.
- 2.18 The Methodology does not take account of landscape quality or the sensitivity of landscapes to accommodate development, recognising that these are not issues relating to Green Belt purposes and its function. The Council's Green Belt Review therefore takes the correct approach by considering individual parcels of land against the Green Belt purposes using a set of defined criteria, and limiting consideration to only Green Belt matters.
- 2.19 The criteria for and 'Issues for Consideration' used by The Council's Review are considered below for each purpose.

Issue for Consideration	Criteria	Tyler Grange Comments
Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	Does not take into account Industrial Areas. The Review defines sprawl as including: <i>"the irregular or</i> <i>straggling expansion of an</i> <i>urban or industrial area,</i> <i>spreading out over a large area</i> <i>in an untidy and irregular way"</i> ⁵

To check the unrestricted sprawl of large built-up areas

⁵ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.23, page 11, third bullet



⁴ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.7, page 8

Issue for Consideration	Criteria	Tyler Grange Comments
Ribbon Development.	Does the parcel play a role in preventing ribbon development?	Criteria do not specify whether this is ribbon development that extends from a built area.
		development may occur as sprawl, it should be clarified as to whether the parcel extends along route ways ⁶ extending from a built area inset within or outside the Green Belt.

To prevent neighbouring towns merging into one another

Issue for Consideration	Criteria	Tyler Grange Comments
Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	The Review defines settlement as: "a village or strategic employment site as defined in Core Policy 1 of the South Staffordshire Local Plan, including Main Service Villages, Local Service Villages, Small Service Villages and Other Villages and Hamlets" ⁷ This includes small villages and hamlets that are situated within the Green Belt. The purpose relates to the merging of neighbouring towns. These may reasonably be considered to be neighbouring settlements out with the Green Belt. Therefore, a more relevant criterion would be to consider the distance from the nearest town / settlement outside or set within the Green Belt.



⁶ Ribbon Development defined within South Staffordshire Partial Green Belt Review, January 2014, paragraph 3.23, page 11, as: *"linear development along route ways, such as roads, canals and railways"* ⁷ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.23, page 11, second bullet

Issue for Consideration	Criteria	Tyler Grange Comments
Location of the parcel.	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	The criterion is not clear as to how the location relates to separation of settlements. More specifically, the criteria should relate to the location of the parcel in relation to the existing settlement pattern, and how it may maintain separation between settlements inset within or outside the Green Belt.
Type and location of physical boundaries bordering / separating parcels: motorways, railways, rivers or woods.	Are there natural or man- made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	Physical boundaries to be considered should also include roads. The Review also identifies roads as 'significant man-made features' that are recognisable as robust Green Belt parcel boundaries. ⁸

To assist in safeguarding the countryside from encroachment

Issue for Consideration	Criteria	Tyler Grange Comments
Significance of urbanising influences. Openness.	s. been affected by encroachment of built	The Criterion does not clarify what is meant by urbanising influences. In order to undertake a transparent
	parcel?	assessment, these should be defined, i.e. to include built form, infrastructure and land uses that may be considered to be urbanising.
		Clarity should also be provided as to whether urbanising influences include adjacent development land uses as well as those within the parcel.

⁸ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.24, page 11, second bullet



Issue for Consideration	Criteria	Tyler Grange Comments
Significance and permanence of boundaries / features to contain development and prevent encroachment .	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	The criterion does not take into account how the parcel relates to the existing settlement pattern. For example, if a parcel were set within the extents of the existing building line on the edge of a settlement, it may not encroach into the countryside, despite lack of significant boundaries. There also needs to be added clarity when considering boundaries / features outside the parcel. Features beyond those adjoining the edge of a parcel may not prevent encroachment into the countryside if they are situated distant from the parcel and do not form part of a defensible boundary should Green Belt be released.
Countryside access / recreation	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep).	The NPPF encourages the enhancement of beneficial uses of the Green Belt once they have been defined, including provision of access, recreation and environmental benefits (NPPF paragraph 81). However, these do not relate to the purposes or function of the Green Belt designation and are therefore not relevant when considering the contribution that land makes to the Green Belt purposes.



Issue for Consideration	Criteria	Tyler Grange Comments
Contribution of parcel to setting and special character of setting.	Are there features of historic significance in the parcel or visible from the parcel?	The purpose relates to the setting and special character of historic towns. The criterion considers 'features of historic significance', including: Conservation Areas, Registered Parks and Gardens, Listed Buildings and Historic Landscape Areas ⁹ . The assessment of parcels also takes into account Scheduled Monuments (e.g. Four Ashes, parcels 3 and 4). With the exception of Conservation Areas, these designations do not necessarily relate to settlements, their setting or special character. A more appropriate criterion would be identifying Conservation Areas associated with settlements as an identifier of areas of historic significance and the relationship of the parcel with these and their settings.

To preserve the setting and special character of historic towns

⁹ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.24, page 11, seventh bullet



To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Issue for Consideration	Criteria	Tyler Grange Comments
The need to incentivise development within settlements.	Does the settlement contain significant areas of brownfield land?	All land within the Green Belt fulfils this purpose by default through restricting development outside of urban areas. Whether a settlement contains brownfield land or not does not affect whether the Green Belt makes a greater or lesser contribution to achieving this aim.

- 2.20 As shown by the analysis above, the issues for consideration against each purpose interpret the NPPF correctly. The exception to this is the inclusion of countryside access and recreation in relation to the Green Belt purpose 'to assist in safeguarding the countryside from encroachment'. However, some of the criteria are not adequately defined or of specific relevance to the purposes and issues being considered.
- 2.21 In order to provide clarity and allow for a more clearly defined and transparent assessment to be undertaken at Hilton Park, Tyler Grange have updated and refined some of the criteria. These are set-out in Section 3 of this report.

Assessment of Contribution to Green Belt Purposes

- 2.22 The methodology employed by the Council's Green Belt Review makes judgements against each of the criteria to establish the contribution that each parcel makes to the Green Belt purposes. This uses a scoring system and a set of parameters against which values are attributed as follows:
 - +++ Makes a considerable contribution to Green Belt Purposes
 - ++ Makes a contribution to Green Belt Purposes
 - + Makes a more limited contribution to Green Belt Purposes
- 2.23 The scores were used to make an 'overall judgement' for each parcel, with the methodology stating that:

*"If a parcel scores highly against a single purpose, it automatically falls into the dark green category, making a considerable contribution to the Green Belt purposes. However, for parcels where this is not the case, we have taken account of parcel performance against the full range of purposes."*¹⁰

¹⁰ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.20, page 10



Judgement Exceptions

2.24 In recognition of scenarios that required more complex judgements that came apparent through undertaking the assessment, the methodology identified two exceptions when assessing the contribution that parcels may make to preventing neighbouring towns from merging¹¹:

Encroachment of the countryside e.g. significant 'urbanising influences', such as large concentrations of buildings and other forms of urbanised land, like brownfield land, can have a 'sprawling' and or 'merging' effect on a 'settlement' or 'settlements' compromising a parcel's value as a inhibiting or separating feature that prevents sprawl and or merging. Where significant encroachment has already taken place within a parcel separating close (<500m) settlements, less value shall be placed on their close proximity (+++ to ++).

Where a significant boundary, such as a raised motorway or railway line inhibits merging and restricts views from neighbouring settlements, the significance of a neighbouring settlement's close proximity (i.e. <500m away) to a parcel, and thus the parcel's value in preventing merging, will be diminished from +++ to ++.

2.25 When identifying parcels to assess, the Council's Green Belt Review considers that land situated beyond a significant boundary such as motorway or A-road would be isolated from existing settlements.¹² Parcels were therefore not included beyond roads bordering settlements. This approach supports the assertion that significant boundaries provide separation from settlements that may be in close proximity and is consistent with the assumptions within the methodology.

Ranking of Parcels

- 2.26 The Council's Green Belt Reviews seeks to rank parcels around settlements and employment sites relative to one another. This allows for the identification of any variance between individual sites based upon the assessment of the individual criteria.
- 2.27 However, the weighting applied using the scoring parameters and criteria does not allow for a balanced assessment to be made. This is due to there being a variance in the number of criteria and selection of scoring parameters attributable to each purpose. For example, whilst the Review acknowledges that no Green Belt purpose is considered more important in the NPPF, there is still some ambiguity in the scoring for each purpose. The methodology states that: "...*if a parcel scores three* (+++) *against any single criterion it was deemed to make a considerable contribution to the Green Belt.*"¹³ This is the highest contribution this assessment affords to a parcel. However, it is clear from the criteria that some criterion an only be scored a maximum of two (++) with other purposes having more than one criterion where a score of three (+++) is possible.
- 2.28 In addition, it is also stated that: "If a parcel scores highly against a single purpose, it automatically falls into the dark green category, making a considerable contribution to the Green Belt purposes." Whilst this reflects the fact the NPPF does not apply more weight to one Green Belt purpose over another, the scoring parameters do not allow for a consistent, balanced approach to be taken when ranking parcels. For example, the purpose to preserve the setting and special character of historic towns can score a maximum of 3, whereas the purpose to prevent neighbouring towns merging into one another can score a total of 8. By not having a common number of criteria for each

¹³ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.18, page 10



¹¹ South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.21, page 10

¹² South Staffordshire Partial Green Belt Review, January 2014: paragraph 3.7, page 7

purpose, the assessment of the contribution of a parcel to the Green Belt and its ranking against other parcels may be skewed.



Land at Hilton Park, M6 Junction 11 Green Belt Review

Section 3: Revised Criteria and Parameters

- 3.1 In light of the issues identified with the transparency and weighting of the assessment undertaken within the Council's Green Belt Review, Tyler Grange have refined some of the criteria to provide greater clarity, as well as introducing additional parameters to enable a more thorough and balanced assessment of the contribution a parcel makes to each Green Belt purpose. The revised criteria and scoring parameters are detailed below.
- 3.2 As identified in the review of the LUC methodology (Section 2), the issues for consideration against each of the Green Belt purposes are largely correct. The exception to this is the inclusion of matters relating to countryside access and recreation when assessing the contribution of parcels to preventing encroachment into the countryside.
- 3.3 In order to allow for a comparative assessment to be undertaken between the Council's assessment of sites at the four SES's and the relative contribution of land at Hilton Park to the Green Belt, the issues for consideration and remaining criteria remain unchanged, save for some additional clarity in their definition. This allows for scoring / value parameters to be consistently applied.
- 3.4 The main differences between the two sets of criteria employed by LUC and Tyler Grange are:
 - The removal of consideration of countryside access and recreation as an indicator relating to encroachment into the countryside; and
 - Considering that all parcels automatically contribute to the purpose 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.
- 3.5 As discussed above, the scoring parameters used within the Council's Green Belt Review do not allow for a balanced, transparent assessment of contribution. This is due to there being a variance in the number of criteria and selection of scoring parameters attributable to each purpose and the lack of a transparent or replicable method for assessing the overall contribution that parcels make to the Green Belt.
- 3.6 In order to remedy this Tyler Grange have ensured that there are three options for each of the criteria being assessed, reflecting the three levels of contribution (considerable contribution, contribution, or more limited contribution). These have been recorded on assessment tables and plans using dark green, mid-green and light green as below:
 - +++ Makes a **Considerable Contribution** to Green Belt purposes
 - ++ Makes a **Contribution** to Green Belt purposes
 - + Makes a More Limited Contribution to Green Belt purposes
- 3.7 There is a clearly defined parameter for reach of these scores, enabling comparable assessment to be made for each purpose and set of criteria.
- 3.8 Although Tyler Grange have updated the criteria and parameters to allow for each of the criteria to score either a +++, ++ or +, there is still a mismatch between the number of criteria for each purpose. In order to provide a balanced, transparent assessment, when summarising the overall contribution that parcels make to the Green Belt purposes, the highest scoring criterion for all



purposes had been used. Similarly, when identifying the contribution that each parcel makes to the individual Green Belt purposes, the highest scoring criterion for each purpose has been used.

- 3.9 The findings of the assessment are summarised within the report and set-out on the following:
 - Assessment Tables for each parcel detailing the assessment of contribution to each of the Green Belt purposes, including the scoring against each criterion;
 - Assessment Summary Plan illustrating the overall assessment for all parcels; and
 - Assessment Summary Plan illustrating the assessment for individual Green Belt Purposes

Assumptions and Limitations

Judgement Exceptions

3.10 Although the land at Hilton Park does not adjoin an existing settlement or employment area, it is situated within close proximity to the village of Shareshill, separated by the A460 and Saredon Filling Station, as well as residential properties and commercial premises along Hilton Lane. It is therefore considered relevant in this instance to include the judgement exceptions relating to significant boundary features when considering separation from neighbouring settlements.

Boundaries

- 3.11 Whereas the Council's Green Belt Review does not consider areas of woodland as robust, defensible boundaries, the assessment contained within this report identifies that woodland and tree belts are recognisable boundaries that are likely to be permanent.
- 3.12 When assessing the role that boundaries and features play in preventing encroachment into the countryside, the assessment focuses on the external boundaries to the assessment area at Hilton Park that are formed by the M6 motorway, A460 and Hilton Lane. These mark features that may provide robust, permanent and defensible boundaries to the Green Belt if land were to be released in this location.

Ranking of Parcels

- 3.13 The Council's Green Belt Reviews seeks to rank parcels around settlements and employment sites relative to one another. This allows for the identification of any variance between individual parcels based upon the assessment of the individual criteria.
- 3.14 The assessment of the land at Hilton Park is considering the whole of the Site area as a potential strategic allocation for removal from the Green Belt. Therefore, there is no need to rank individual parcels relative to one another. The contribution that the parcels make and the implications for the release of the site are to be considered together when identifying Green Belt issues and the potential for release of the Site from the Green Belt. Where relevant, the relative merits of individual parcels are summarised within the reporting findings.

Revised Assessment Criteria and Scoring Parameters

3.15 The revised Green Belt Criteria and Scoring Parameters developed by Tyler Grange are set-out on the table below. These have been used when undertaking the assessment of the contribution that land at Hilton Park makes to the Green Belt purposes.



neters	+++++	+++	+	++++			++										+				
Scoring / Value Parameters	Abuts West Midlands Urban Area.	Abuts Industrial Area.	Abuts settlement inset within or outside the Green Belt.	Parcel lies along a road, railway or canal	extending beyond and adjoining the built	edge.	Parcel lies along a	road, railway or canal	between the pull edge	outlying gateway	features or sprawling	aevelopment.	Parcel lies along a	road, railway or canal	exteriaring irom but	built edge.	Parcel does not lie	adjacent to roads,	railways or canals	built edge.	1
Criteria	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall	or Cannock; the boundary of an Industrial Area: or settlement inset	within or outside the Green Belt?	Does the parcel play a role in preventing ribbon development	extending along roads, railways or canals from settlement / built areas	inset within or outside the Green	Belt?														
Issue for Consideration	Location in relation to the West Midlands urban area	(Wolverhampton, Dudley, Walsall and Cannock) and Industrial Areas		Ribbon Development																	
NPPF Green Belt Purpose	To check the unrestricted sprawl of large built-up areas.																				

Revised Green Belt Review Criteria and Scoring Parameters



NPPF Green Belt Purpose	Issue for Consideration	Criteria	Scoring / Value Parameters	rs
			Parcel lies along a road, railway or canal but does not extend beyond the extent of existing ribbon development.	
To prevent neighbouring towns from merging into one another.	Distance between parcel and the nearest neighbouring settlement(s) inset within or outside the Green Belt	What is the distance to the nearest neighbouring settlement inset within or outside the Green Belt	If abuts boundary or +++ <500m. If between 500m and ++ 1km from boundary. +	+ +
	Location of the parcel in relation to existing settlement pattern	Does the parcel play a major role in maintaining separation between settlements inset within or outside the Green Belt?	Existing separation <500m and parcel extends beyond existing built edge / established building line towards adjacent settlement.	+
			Parcel extends beyond ++ established building line but retains separation of 500m - 1km.	+
			Parcel is contained + within extents of the settlement and does not extend beyond existing building line towards adjacent settlement.	
			Parcel extends beyond established building line but retains separation of >1km.	



NPPF Green Belt Purpose	Issue for Consideration	Criteria	Scoring / Value Parameters	ers
	Type and location of physical boundaries bordering / separating parcels: motorways, roads, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements inset within or outside the Green Belt from merging with one another? These could be outside the parcel itself	No significant ¹⁴ + boundary between the parcel and neighbouring settlement. Less significant ¹⁵ + boundary between the parcel and neighbouring settlement. Significant boundary + Significant boundary + between the parcel	+ + +
			and the neighbouring settlement.	
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ¹⁶ Openness. ¹⁷	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel	No Encroachment: Parcel is free from development and adjacent urbanising influences. Limited encroachment: Parcel contains some limited development and / or is influenced by adjacent urban	+ + + +

¹⁴ Significant boundaries, as defined within the South Staffordshire Partial Green Belt Review Method Statement, January 2014 include (paragraph 3.24): watercourses, woodland, tree belts, motorways, roads and railway lines

¹⁵ Less significant boundaries, as defined within the South Staffordshire Partial Green Belt Review Method Statement, January 2014 include (paragraph 3.24): Hedgerows, tree lines and streams

¹⁶ Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway

lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture.

¹⁷ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of openness within the parcel."



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NPPF Green Belt Purpose	Issue for Consideration	Criteria	Scoring / Value Parameters	ters
			influences and land use.	
			Encroached upon:	+
			or is surrounded by	
			existing development	
			and undamismig influences.	
	Significance and permanence of	Are there existing natural or man- made features / boundaries that	Parcel lies beyond the existing hundring /	+++
	development and prevent	would prevent encroachment in the	extents of the built	
	encroachment.	long term?	edge.	
		These second he subjude the nervel	no clearly defined,	
		Inese could be outside the parcel and serve to form a robust and	recognisable poundary between the parcel	
		defensible boundary with the wider	and the open	
		countryside.	countryside.	
			Less significant	++
			boundary between the	
			parcerario une open countryside.	
			Significant boundary(s)	+
			between the parcel	
			and the open	
			countryside.	
	<u>Note:</u> Countryside access / recreation was included within the South Staffordshire Green Belt Review Method Statement	cluded within the South Staffordshire	Green Belt Review Methoo	d Statement
	employed by LUC as a criterion when	a criterion when assessing contribution to this purpose.	·	
	The NPPF encourages the enhancement of beneficial uses of the Green Belt once they have been defined, including	ent of beneficial uses of the Green Bel	It once they have been def	fined, including
	provision of access, recreation and environmental benefits (NPPF paragraph 81). However, these do not relate to the purposes or function of the Green Belt designation and are therefore not relevant when considering the contribution that	/ironmental benefits (NPPF paragraph designation and are therefore not rele	181). However, these do n	not relate to the
	land makes to the Green Belt purposes.			



NPPF Green Belt Purpose	Issue for Consideration	Criteria	Scoring / Value Parameters	Ø
To preserve the setting and special character of historic towns	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	Parcel lies within or adjacent to a historic town. Parcel is separated from a settlement containing a Conservation Area, but facilitates recognised important views. Parcel is Parcel is recognised important view to or from a conservation Area.	
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	<u>Note:</u> It is considered that all land within the Green Belt fulfils this purpose by default through restricting development outside of urban areas. Therefore, it is assumed that all parcels of land within the Green Belt contribute to equally to this purpose.	Green Belt fulfils this purpose by defated that all parcels of land within the Gr	ult through restricting developm sen Belt contribute to equally t	ment outside to this



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Section 4: Land at Hilton Park, M6 Junction 11 Green Belt Review

Definition of Land Parcels

- 4.1 As with the Council's Green Belt Assessment, the Site has been divided into parcels defined by robust boundaries, including roads, tree belts, watercourses, woodland and hedgerows. Parcels were defined based on a review of mapping, aerial photography and site visits.
- 4.2 Photographs were taken to record parcels character, boundaries, openness, views, land use, proximity to settlements, etc. The Site area and Land Parcels are land parcels to be assessed are illustrated on Plan 1 Site Location and Photoviewpoint Locations and Plan 2 Assessment Parcels.
- 4.3 A parcel of land outside that controlled by Nurton Developments (Hilton) Limited (Parcel 8) has also been included within the assessment. This parcel adjoins the Site and is contained within the boundary formed by the A460 to the west that provides separation from Shareshill and the adjacent countryside.

Findings of Green Belt Assessment

- 4.4 The findings of the Green Belt Assessment are summarised below in relation to the overall contribution to the Green Belt and for each of the individual Green Belt purposes. The detailed assessment of the contribution of each of the land parcels at Hilton Park is recorded on the Assessment Sheets. Reference is made to Photoviewpoints where relevant.
- 4.5 The overall contribution assessed for each parcel is illustrated on Plan 3 Assessment Summary (Hilton Park). The findings for each of the individual purposes are illustrated on Plan 4 Assessment: Individual Green Belt Purposes (Hilton Park).

Overall Contribution to Green Belt

- 4.6 All of the parcels across the Site have been assessed as making an overall *Contribution* to the Green Belt. As considered further below in relation to each of the Green Belt purposes, this is due to the separation from neighbouring settlements and containment by significant boundaries, including: the M6 motorway, A460, Hilton Lane, tree belts and woodland.
- 4.7 The influence of adjacent urban influences, ribbon development and the main roads place the site within an urban fringe location, reducing the contribution that the land makes to safeguarding the countryside.
- 4.8 Despite the strong containment by roads, the potential for sprawl along routes extending from Shareshill (Hilton Lane and the A460) has been identified as making a *Contribution* to the Green Belt for some parcels. Existing ribbon development including residential properties, commercial premises and farms along Hilton Lane and the A460 introduce urbanising influences, limiting the contribution that parcels make to checking the unrestricted sprawl of built up areas.
- 4.9 As considered further below in **Section 6**, there are opportunities for the strategic release of land from the Green Belt to use the existing roads as a robust boundary, thereby providing containment and limiting the potential for encroachment into the wider countryside.



To check the unrestricted sprawl of large built-up areas

- 4.10 When considered against their proximity to urban or industrial areas, none of the parcels were assessed as making greater than a *More Limited Contribution* to this purpose. Although the western edge of the Site lies within close proximity to Shareshill, land at Hilton Park is separated from the settlement edge by the A460. Using the methodology employed by the Review, the road comprises a significant boundary and separation with the settlement.
- 4.11 Parcels further to the east are separated from both Shareshill to the west and other settlements in the local area by roads bounding the Site, including Hilton Lane and the M6 motorway.
- 4.12 When considering ribbon development, Parcels 1 4 that bound Hilton Lane to the south and Parcels 2 and 8 that runs alongside the A460 have been assessed as making a *Contribution* to this purpose. The presence of existing ribbon development, including both commercial sites and residential properties along these roads limit the importance of the parcels to this function, having already introduced sprawl.

To prevent neighbouring towns merging into one another

- 4.13 Although the Site is situated within close proximity to Shareshill to the east, the presence of the A460 and ribbon development serve to reduce the contribution that Parcel 1 makes to this purpose.
- 4.14 Settlements at Shareshill, Featherstone and Cheslyn Hay are either distant and / or situated beyond significant boundaries formed by roads, woodland and tree belts. Parcels within the Site have been assessed as making a *More Limited Contribution* towards the east of the Site and a *Contribution* to the west, where parcels are in closer proximity to Shareshill and Featherstone.
- 4.15 Roads, woodland and tree belts bounding the Site and within the adjacent countryside serve to limit the potential for the physical or visual merging of settlements. The Site has therefore been assessed as making a *More Limited Contribution* to this criterion.

To assist in safeguarding the countryside from encroachment

4.16 The roads bounding the wider Site area provide robust, defensible boundaries and limit the potential for encroachment into the wider countryside. The presence of adjacent settlement and major road infrastructure limits the tranquillity, rurality and character of the Site and surrounding area. This serves to limit the contribution that all parcels make when assessed against the significance of existing urbanising influences and development. This has resulted in an assessment of making *Contribution* for all parcels.

To preserve the setting and special character of historic towns

4.17 None of the parcels have been assessed as making greater than a *More Limited Contribution* to this purpose. None of the parcels are situated within or adjacent to a historic town or settlement containing a Conservation Area, nor facilitate recognised important views to or from a Conservation Area.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

4.18 This purpose was not assessed, as it is considered that all land within the Green Belt performs this function equally.



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 Parcel 1
Assessment
en Belt
11: Green
M6 Junction
n Park, M
Hilto

NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock) and Industrial Areas.	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock; the boundary of an Industrial Area; or settlement inset within or outside the Green Belt?	+ Despite the western boundary of the parcel being located <100m to the settlement of Shareshill, the A460 separates the parcel from Shareshill.
	Ribbon Development.	Does the parcel play a role in preventing ribbon development extending along roads, railways or	(Photoviewpoint 1 and 4). + The parcel lies along Hilton Lane
		Belt?	Existing ribbon development has occurred along Hilton Lane adjacent to the parcel in the south whilst a service station is located along the A460 in the west.
			(Photoviewpoint 1 and 2).
To prevent neighbouring towns from merging into one another.	Distance between parcel and the nearest neighbouring settlement(s) inset within or outside the Green Belt.	What is the distance to the nearest neighbouring settlement inset within or outside the Green Belt.	++ The parcel lies adjacent to Shareshill, but is separated by the A460. The shortest distance between the parcel and the settlement of Featherstone is approximately 500m.



NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
	Location of the parcel in relation to existing settlement pattern.	Does the parcel play a major role in maintaining separation between settlements inset within or outside the Green Belt?	++ The parcel extends beyond and is separated from the settlement edge but retains a separation of 500m from Featherstone and over 1km from Cheslyn Hay.
	Type and location of physical boundaries bordering / separating parcels: motorways, roads, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements inset within or outside the Green Belt from merging with one another? (These could be outside the parcel itself).	The parcel is separated from Featherstone by Hilton Lane and tree belts to the south.
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ¹⁸ Openness. ¹⁹	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	++ The parcel is free from development but is bordered to back gardens of properties along Hilton Lane, a service station along the A460 and a leisure centre at Brookfield Farm. (Photoviewpoint 1, 2 and 4).

¹⁹ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of ¹⁸ Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture.



openness within the parcel."

NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ The parcel is bounded by the A460 to the west and Hilton Lane to the south.
			(Photoviewpoint 1 and 2).
To preserve the setting and special character of historic	Contribution of parcel to setting and special character of historic towns or	Is the parcel situated within or adjacent to a Conservation Area	+
towns	conservation areas within settlement inset within or outside the Green Belt.	associated with a settlement?	The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.



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NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To check the unrestricted sprawl	Location in relation to the West	Is the parcel abutting the boundary	
or large built-up areas.	(Wolverhampton, Dudley, Walsall and Cannock) and Industrial Areas.	or worken ampound bundery, waisain or Cannock; the boundary of an Industrial Area; or settlement inset within or outside the Green Belt?	
	Ribbon Development.	Does the parcel play a role in preventing ribbon development extending along roads, railways or canals from settlement / built areas	
		Belt?	A small number of existing properties have sprawled along Hilton Lane along the southern boundary of the parcel.
			(Photoviewpoint 5b)
To prevent neighbouring towns from merging into one another.	Distance between parcel and the nearest neighbouring settlement(s)	What is the distance to the nearest neighbouring settlement inset within	+
	inset within or outside the Green Belt.	or outside the Green Belt.	The shortest distance between the parcel and the edge of Featherstone is approximately 500m.
	Location of the parcel in relation to existing settlement pattern.	Does the parcel play a major role in maintaining separation between	+
		settlements inset within or outside the Green Belt?	The parcel extends beyond and is separated from the settlement edge but retains a separation of 500m from Featherstone and over 1km from Cheslyn Hay.
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Hilton Park, M6 Junction 11: Green Belt Assessment – Parcel 2

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Land at Hilton Park, M6 Junction 11 Green Belt Review

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	Type and location of physical boundaries bordering / separating parcels: motorways, roads, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements inset within or outside the Green Belt from merging with one another? (These could be outside the parcel itself).	+ Hilton Lane and woodland around Hilton Hall separate the parcel from Featherstone.
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ²⁰ Openness. ²¹	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	++ The parcel is free from development but is situated adjacent to existing properties at Hilton Lane.
	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ The eastern and western boundaries of the parcel are formed by tree belts continuing into woodland in the north where a number of ponds are also situated.
			Hilton Lane forms the southern boundary, with woodland beyond.
To preserve the setting and special character of historic towns	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt.	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	+ The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.

²¹ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences ²⁰ Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture.

has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of cenness within the parcel."



NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock) and Industrial Areas.	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock; the boundary of an Industrial Area; or settlement inset within or outside the Green Belt?	+ The parcel is separated from settlement inset or outside the Green Belt.
	Ribbon Development.	Does the parcel play a role in preventing ribbon development extending along roads, railways or canals from settlement / built areas inset within or outside the Green Belt?	++ The parcel lies along Hilton Lane extending the built edge. Ribbon development occurs sporadically along Hilton Lane, including The Yells Farm located east of the parcel.
To prevent neighbouring towns from merging into one another.	Distance between parcel and the nearest neighbouring settlement(s) inset within or outside the Green Belt.	What is the distance to the nearest neighbouring settlement inset within or outside the Green Belt.	++ The shortest distance between the parcel and the edge of Featherstone is approximately 800m.
	Location of the parcel in relation to existing settlement pattern.	Does the parcel play a major role in maintaining separation between settlements inset within or outside the Green Belt?	++ The parcel extends beyond and is separated from the settlement edge but retains a separation of 800m from Featherstone and over 1km from Cheslyn Hay.

Hilton Park, M6 Junction 11: Green Belt Assessment – Parcel 3



Land at Hilton Park, M6 Junction 11 Green Belt Review

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NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
	Type and location of physical boundaries bordering / separating parcels: motorways, roads, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements inset within or outside the Green Belt from merging with one another? (These could be outside the parcel itself).	+ The parcel is separated from Featherstone by Hilton Lane and woodland around Hilton Hall.
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ²² Openness. ²³	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	++ The parcel is free from development but is heavily influenced by the M6 located <200m to the east.
	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ The parcel is bounded by Hilton Lane to the south and woodland beyond.
To preserve the setting and special character of historic towns	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt.	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	+ The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.

²³ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of ²² Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture. openness within the parcel."



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Land at Hilton Park, M6 Junction 11

NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock) and Industrial Areas.	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock; the boundary of an Industrial Area; or settlement inset within or outside the Green Belt?	+ The parcel does not adjoin settlement inset or outside the Green Belt.
	Ribbon Development.	Does the parcel play a role in preventing ribbon development extending along roads, railways or canals from settlement / built areas inset within or outside the Green Belt?	++ The parcel extends along Hilton Lane. A small number of buildings are located within the parcel at The Yells Farm and adjacent on Hilton Lane.
To prevent neighbouring towns from merging into one another.	Distance between parcel and the nearest neighbouring settlement(s) inset within or outside the Green Belt.	What is the distance to the nearest neighbouring settlement inset within or outside the Green Belt.	++ The distance from the parcel to the nearest settlement is approximately 1km to Featherstone.
	Location of the parcel in relation to existing settlement pattern.	Does the parcel play a major role in maintaining separation between settlements inset within or outside the Green Belt?	++ The parcel extends beyond and is separated from the settlement edge but retains a separation of 1km from Featherstone and over 1km from Cheslyn Hay.

Hilton Park, M6 Junction 11: Green Belt Assessment – Parcel 4



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NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
	Type and location of physical boundaries bordering / separating parcels: motorways, roads, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements inset within or outside the Green Belt from merging with one another? (These could be outside the parcel itself).	+ Hilton Lane and woodland separate the parcel from Featherstone.
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ²⁴ Openness. ²⁵	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	+ The parcel contains development at The Yells Farm and is heavily influenced by the M6 situated adjacent to the eastern boundary. (Photoviewpoint 8)
	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ The parcel is well contained in the north, east and west by tree belts with Hilton Lane forming the southern boundary. (Photoviewpoint 9)
To preserve the setting and special character of historic towns	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt.	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	+ The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.

²⁵ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of ²⁴ Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture. openness within the parcel."



Land at Hilton Park, M6 Junction 11

Green Belt Review

Hilton Park, M6 Junction 11: Green Belt Assessment – Parcel 5



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NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ²⁶ Openness. ²⁷	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	++ The parcel is free from development but is heavily influenced by the open nature of the eastern boundary overlooking the M6.
			(Photoviewpoint 10 + 11a)
	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ The parcel is bound by woodland and tree belts in the north and south respectively. The M6 and limited roadside planting forms the eastern boundary. (Photoviewpoint 10)
To preserve the setting and special character of historic towns	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt.	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	+ The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.

²⁷ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences ²⁶ Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture.

has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of openness within the parcel."



Green Belt Review

Land at Hilton Park, M6 Junction 11

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NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area	Is the parcel abutting the boundary of Wolverhampton. Dudlev. Walsall	+
	(Wolverhampton, Dudley, Walsall	or Cannock; the boundary of an	The parcel is not situated abutting
	and Cannock) and Industrial Areas.	Industrial Area; or settlement inset	existing settlement inset or outside
		WITHIN OF OUTSIDE THE GREEN BELT?	the Green Belt.
	Ribbon Development.	Does the parcel play a role in	+
		preventing ribbon development	
		extending along roads, railways or	The parcel does not lie adjacent to a
		canals from settlement / built areas	transport route extending from the
		inset within or outside the Green	built edge.
To prevent neighbouring towns	Distance between parcel and the	What is the distance to the nearest	++
from merging into one another.	nearest neighbouring settlement(s)	neighbouring settlement inset within	
	inset within or outside the Green	or outside the Green Belt.	The shortest distance between the
	Belt.		parcel and the settlement of
			Shareshill is approximately 500m.
	Location of the parcel in relation to existing settlement pattern	Does the parcel play a major role in maintaining separation between	+
		settlements inset within or outside	The narrel extends hevond and is
		the Green Belt?	senarated from the settlement edge
			but retains a senaration of 500m
			from Shareshill, 800m from
			Featherstone and over 1km from
			Cheslyn Hay.
	Type and location of physical	Are there natural or man-made	+
	boundaries bordering / separating	features that could prevent	
	parcels: motorways, roads, railways,	settlements inset within or outside	The parcel is separated from
	livers of woods.	ure Green Bell Hom merging with	Silaresi ili by ure A400 and uree beits bevood
		outside the parcel itself).	



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NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ²⁸ Openness. ²⁹	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	++ The parcel is free from development and is contained by open fields to the north, east and south with a farmstead in the west.
			The parcel is influenced by urban influences including the M6, A460 and associated traffic, settlement and development and urban fringe land use.
			(Photoviewpoint 12)
	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ The northern boundary and much of the eastern and southern boundaries are formed by woodland and watercourses.
			Beyond the parcel, the A460, M6 and Hilton Lane provide containment from the wider countryside, serving to limit potential encroachment.
To preserve the setting and special character of historic towns	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt.	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	+ The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.

²⁹ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of ²⁸ Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture. openness within the parcel."



Green Belt Review

Land at Hilton Park, M6 Junction 11

NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock) and Industrial Areas.	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock; the boundary of an Industrial Area; or settlement inset within or outside the Green Belt?	+ The parcel does not abut settlement inset or outside the Green Belt.
	Ribbon Development.	Does the parcel play a role in preventing ribbon development extending along roads, railways or canals from settlement / built areas inset within or outside the Green Belt?	+ The parcel does not lie adjacent to a transport route extending from the built edge (M6 to east). The elevated slip road bounding the
			parcel to the north at Junction 11 would not facilitate ribbon development along or fronting the road in this location.
To prevent neighbouring towns from merging into one another.	Distance between parcel and the nearest neighbouring settlement(s) inset within or outside the Green Belt.	What is the distance to the nearest neighbouring settlement inset within or outside the Green Belt.	++ The shortest distance between the parcel and the settlement of Shareshill is approximately 750m.
	Location of the parcel in relation to existing settlement pattern.	Does the parcel play a major role in maintaining separation between settlements inset within or outside the Green Belt?	++ The parcel extends beyond and is separated from the settlement edge but retains a separation of 750m from Shareshill and over 1km from Featherstone and Cheslyn Hay.
	Type and location of physical boundaries bordering / separating parcels: motorways, roads, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements inset within or outside the Green Belt from merging with one another? (These could be outside the parcel itself).	+ The parcel is separated from Shareshill by the A460, a watercourse and tree belts to field boundaries beyond.

		5	value / Laiailletels
countryside from encroachment. influences an Openness. ³¹	Significance of existing urbanising influences and development ³⁰ Openness. ³¹	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	++ The parcel is free from development but is heavily influenced by the M6 which runs along the northern and eastern boundary.
			The eastern boundary is open for a large stretch of the motorway with the slip road rising up at Junction 11.
Significance and boundaries / feat development and encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ Main roads form the northern, eastern and western boundaries of the parcel.
			The southern boundary is formed by an area of woodland with a watercourse running through it.
To preserve the setting and special character of historicContribut special character of historicspecial character of historicspecial character cha	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt.	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	+ The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.

³¹ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences ³⁰ Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture.

has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of openness within the parcel."



Green Belt Review

Land at Hilton Park, M6 Junction 11

NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock) and Industrial Areas.	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock; the boundary of an Industrial Area; or settlement inset within or outside the Green Belt?.	+ The parcel does not abut settlement inset or outside the Green Belt.
	Ribbon Development.	Does the parcel play a role in preventing ribbon development extending along roads, railways or canals from settlement / built areas inset within or outside the Green Belt?	++ The parcel lies along the A460 beyond and separated from the built edge. Existing ribbon development and sprawling urban fringe land use has occurred along the A460, including within the parcel at Brookfield Farm and adjacent across the road to the west.
To prevent neighbouring towns from merging into one another.	Distance between parcel and the nearest neighbouring settlement(s) inset within or outside the Green Belt.	What is the distance to the nearest neighbouring settlement inset within or outside the Green Belt.	++ The shortest distance between the parcel and the settlement of Shareshill is approximately 250m. The parcel is separated from Shareshill by the A460.
	Location of the parcel in relation to existing settlement pattern.	Does the parcel play a major role in maintaining separation between settlements inset within or outside the Green Belt?	++ The parcel extends beyond and is separated from the settlement edge but retains a separation of 250m from Shareshill, situated beyond the A460. Cheslyn Hay is situated over 1km away.

Hilton Park, M6 Junction 11: Green Belt Assessment – Parcel 8



Land at Hilton Park, M6 Junction 11 Green Belt Review

NPPF Green Belt Purpose	Issue for Consideration	Criteria	Value / Parameters
	Type and location of physical boundaries bordering / separating parcels: motorways, roads, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements inset within or outside the Green Belt from merging with one another? (These could be outside the parcel itself).	+ The parcel is separated from Shareshill by the A460.
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences and development ³² Openness. ³³	Has the parcel already been affected by encroachment of built development within, adjacent to and surrounding the parcel.	++ The parcel contains development at Brookfield Farm and adjoins the busy A460 road. (Photoviewpoint 13)
	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	+ The parcel is bounded by the A460 to the west.
To preserve the setting and special character of historic towns	Contribution of parcel to setting and special character of historic towns or conservation areas within settlement inset within or outside the Green Belt.	Is the parcel situated within or adjacent to a Conservation Area associated with a settlement?	+ The parcel is separated from and does not facilitate recognised important views to or from a Conservation Area.

³³ As set-out in the South Staffordshire Partial Green Belt Review Method Statement, January 2014 at Appendix 1, page 2, "The significance of existing urbanising influences has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of ³² Urbanising influences, development and infrastructure include: built form (urban, commercial and industrial); motorways, main roads and associated traffic; railway lines; utilities infrastructure (power lines and pylons); and urban fringe land uses including sports and recreation facilities and pitches and horsiculture.



Section 5: Comparative Assessment with South Staffordshire Partial Green Belt Review

- 5.1. Having undertaken an assessment of the contribution that the Site and its constituent land parcels make to the Green Belt purposes, the findings have been compared with those of the Council's Green Belt Review for the land parcels around the four Strategic Employment Sites. This allows for an understanding of the relative contribution of the land at Hilton Park and its viability for release, based upon its importance to the Green Belt and performance in relation to other strategic employment sites within South Staffordshire.
- 5.2. The Council's assessments for each of the employment sites, including assessment tables and maps are included at **Appendix 3**.
- 5.3. A plan showing the assessment of overall contribution that parcels make to the Green Belt for the four existing employment sites and land at Hilton Park are illustrated on **Plan 5 Comparative Assessment with Strategic Employment Sites**.

Summary of Findings

5.4. The Council's assessment of land parcels around each of the four SES's is summarised below, with reference to both the assessment tables (**Appendix 3**) and summaries contained within the main report.

i54

5.5. The Council's Green Belt Review assessed two parcels of land to the west of the i54 employment site. The summary of findings within the report identifies that:

"Both parcels 1 and 2 were deemed to make a contribution to Green Belt due to their role of the parcels in preventing the urban sprawl of Wolverhampton; however, the significant boundaries at their borders reduce their value."

5.6. The assessment of both parcels making an overall 'Contribution' to the Green Belt is due to the potential for ribbon development along bounding roads and recognition of existing urban influences limiting contribution to safeguarding the countryside from encroachment. This reflects the situation of the land at Hilton Park, surrounded by roads and affected by urban fringe land uses and development.

ROF Featherstone

- 5.7. The Council's Green Belt Review assessed three parcels of land at ROF Featherstone, one parcel to the east and two to the west.
- 5.8. Land east of ROF Featherstone was assessed as making a 'Contribution' to Green Belt, being influenced by the presence of existing industrial buildings and existing merging of settlements in the area.
- 5.9. Although recorded by the Council's Green Belt Review as making a 'More Limited Contribution', the assessment of Parcel 2 to the southeast of FOR Featherstone included a number of criteria

³⁴ South Staffordshire Partial Green Belt Review, January 2014: paragraph 4.50, page 18



assessed as ++, and therefore potentially making a 'Contribution' to Green Belt. These included urban influences upon the role of the land in safeguarding the countryside from encroachment and preventing ribbon development. Although within 500m of the edge of Featherstone, the contribution the land east of the employment site made to preventing settlements from merging was reduced due to existing merging and industrial / brownfield development in the area.

- 5.10. The two parcels to the west of ROF Featherstone were found to make a 'More Limited Contribution' to Green Belt, despite having been assessed as ++ in relation to potential to prevent ribbon development, proximity to settlements and safeguarding the countryside from encroachment.
- 5.11. The summary of findings within the report attributes the overall assessment of these parcels as making a 'More Limited Contribution' to the Green Belt to the significant boundaries formed by the M54 limiting merging with Wolverhampton to the south and raised railway line providing containment to the west.

Hilton Cross

- 5.12. The Council's Green Belt Review assessed three parcels of land around the Strategic Employment Site at Hilton Cross, two to the west and one to the east. The two parcels to the west of Hilton Cross were assessed as making a 'Considerable Contribution' to the Green Belt due to their close proximity to the edge of Wolverhampton and the openness of the land within and around them.³⁵
- 5.13. The parcel to the east was assessed as making a 'Contribution' to the Green Belt. The summary of findings within the report identifies that whilst the parcel does not directly abut the Hilton Cross employment site, it borders developed land and should therefore be considered. The assessment identifies that the parcel is well contained by woodland and therefore has been found to score + (a More Limited Contribution) when considering the role of boundaries in relation to preventing towns from merging and encroachment into the countryside.

Four Ashes

- 5.14. The Council's Green Belt Review assessed four parcels around Four Ashes, one to the west and three to the east. The parcel to the west has been assessed by the Council as making a 'Considerable Contribution' to the Green Belt due to potential to facilitate sprawl and encroachment on the countryside.
- 5.15. Two parcels to the northeast were considered to make a 'Contribution' to the Green Belt, being contained by woodland, but with open boundaries to Calf Heath, less than a kilometre distant.
- 5.16. The final parcel to the southeast was assessed as making a 'More Limited Contribution' due to the significant boundaries to all sides (Canal, sewage works and floodplain). The use of a floodplain as a significant boundary is flawed, as it is not clearly defined on the ground. The parcel is therefore not contained or separated from the wider countryside to the south and may therefore make a higher contribution to the purpose of preventing encroachment into the countryside than assessed by the Council's Review.

³⁵ South Staffordshire Partial Green Belt Review, January 2014: paragraph 4.48, page 18



Comparative Assessment

- 5.17. The land at Hilton Park has been assessed as making an overall 'Contribution' to the Green Belt. As illustrated on **Plan 5 – Comparative Assessment with Strategic Employment Sites**, this reflects the findings for six of the twelve parcels considered around the four SES/s assessed at i54, ROF Featherstone, Hilton Cross and Four Ashes.
- 5.18. As detailed above, the Council's Green Belt Review considers three parcels to make an overall 'More Limited Contribution' to the Green Belt. Within the assessment for each of these, the assessment against the individual criteria includes assessments of ++. Using the scoring methodology employed by Tyler Grange, the assessment of any one criteria as ++ would default to the parcel making a 'Contribution'.
- 5.19. There may therefore be some parcels at Hilton Park assessed as making an overall 'Contribution' that perform similarly to those at other SES's that were assessed as only making a 'Limited Contribution'. These may include performance in relation to the potential to prevent ribbon development, proximity to settlements and safeguarding the countryside from encroachment, as illustrated Plan 4 Assessment: Individual Green Belt Purposes (Hilton Park). The lack of transparency and consistency in the Council's assessment does not allow for a transparent like-for-like comparison to be made.

Comparison with Proposed Allocation Sites at i54 and ROF Featherstone

- 5.20. Considering the above factors, when compared with the findings of the Council's assessment of the Strategic Employment Sites, land at Hilton Park has been assessed as making the same overall contribution to the Green Belt as land at the i54 and ROF Featherstone sites that are proposed for release within the Preferred Options Consultation SAD.
- 5.21. Furthermore, the factors influencing the assessment are shared between the land at Hilton Park, i54 and ROF Featherstone. These include:
 - Separation from nearby settlements by roads, motorways and railways,
 - Urbanising influences limiting the contribution the land makes to safeguarding the countryside from encroachment; and
 - Containment by significant boundaries, preventing encroachment into the countryside, merging of settlement and sprawl.
- 5.22. It can therefore be concluded that the release of land at Hilton Park from the Green Belt would cause no greater harm to the function of the Green Belt than those sites currently being proposed for allocation by the Council.



Section 6: Consideration of Release from the Green Belt

- 6.1. Having assessed the contribution that land at Hilton Park makes to the purposes of the Green Belt, this section draws together the findings of the assessment to establish the following:
 - How the development of land at Hilton Park, M6 Junction 11 for employment uses may best respond to the Green Belt context; and
 - Make recommendations as to how the Site and adjacent land lying within an area defined and contained by the M56 Motorway, A460 and Hilton Lane may be released from the Green Belt within the emerging South Staffordshire Local Plan SAD.
- 6.2. Reference is made to the requirements of the NPPF when releasing land and the re-drawing of Green Belt boundaries.

Recommendations for Development

Green Belt Issues

- 6.3. The assessment of the contribution to Green Belt has identified the following aspects of the land at Hilton Park that may be of particular sensitivity in relation to the function and openness of the Green Belt. This includes identification of boundaries that may be enhanced through structural landscape planting. As considered further below in relation to the release of land in this location from the Green Belt, these could form permanent, recognisable and defensible Green Belt boundaries in the long term:
 - Proximity of the site to Shareshill, separated by the A460;
 - Potential for ribbon development and infilling along A460 and Hilton Lane, although these roads already some sporadic development and sprawl;
 - Open, unplanted boundary to lengths of the A460 (Parcels 1 and 8) allowing intervisibility with Shareshill and views across the Site area from the road; and
 - Open lengths of the boundary with the M6 to the east (Parcel 5).
- 6.4. In order to respond to the above, the following measures may be incorporated within the development proposals for the Site. These and other recommendations set-out below in relation to landscape, Green Infrastructure and residential visual amenity:
 - Strengthening of boundaries along adjacent roads and field boundaries bounding the Site with structural landscape buffer planting (tree belts / woodland); and
 - Setting-back development to west of the Site and provision of buffer planting to maintain physical and visual separation with Shareshill. Locating smaller units in this area will also minimise visual impacts of proposals from Shareshill and associated perception of encroachment.



Landscape, Green Infrastructure and Residential Visual Amenity Considerations

- 6.5. Other non-Green Belt considerations include the following factors which may be incorporated into the development of the Site in order to provide integration with the existing landscape character and pattern, Green Infrastructure and adjacent land uses (residential, commercial, infrastructure and agricultural):
 - The elevated, rolling landform towards the centre of the Site that is visible from within the local landscape to the north and west, and outward views from Public Rights in this area:
 - Re-profiling of land to accommodate commercial development in this location would reduce the prominence of the landform and provide the opportunity to provide bunding on other areas of the Site to provide containment and limit visual impacts of development (along with structural landscape planting);
 - There may also be opportunities to provide the planting of areas of woodland / tree belts to reflect local character, provide Green Infrastructure and biodiversity benefits and softening of views towards development.
 - Areas of woodland and tree belts and riparian vegetation along watercourses and associated with waterbodies on the lower-lying land to the southeast of Brookfield Farm and northeast (between parcels 5 and 6). These form strong features in the local landscape, tying-in with surrounding woodland and tree belts, including those along road corridors and to field boundaries, to give a well treed context. Areas of woodland, tree belts and associated watercourse and waterbodies provide biodiversity benefits:
 - There are opportunities to retain and enhance the areas of woodland, watercourses, waterbodies and green corridors within the Green Infrastructure of the proposals. These could tie-in with any additional features created on-site including SUDS, wildlife areas and open spaces as part of an integrated Green Infrastructure strategy.
 - Opportunities to retain existing Public Rights of Way across the Site area to provide access and connections with the adjacent settlement at Shareshill and wider landscape. There are also opportunities to integrate these and new foot / cycleways across the site into areas of new Green Infrastructure and publically accessible amenity spaces.
 - Development proposals would need to respect the visual amenity of residents adjoining and overlooking the site area on Hilton Lane. This could be achieved by:
 - o Locating smaller units in areas adjacent to residential properties;
 - Providing a setback to properties; and
 - The provision of landscape buffer planting to soften the developed edge and limit visual impacts.
 - Retention of existing trees and hedgerows within and bounding the site where possible and opportunities to reinstate former hedgerows and plant additional hedges and trees within the proposals.
 - Enhancing boundary vegetation to boundaries to strengthen the landscape structure, reduce visual impacts and provide additional physical and visual separation between the Site and Hilton Park (Historic Landscape Area) and Shareshill.



Recommendations for Release of Green Belt and Re-drawing of Green Belt Boundaries

Exceptional Circumstances and Sustainable Development

6.6. The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances through the preparation of a Local Plan, and that at that time:

"... authorities should consider having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period." (NPPF paragraph 83)

- 6.7. At paragraph 84, the NPPF also requires local planning authorities, when drawing up or reviewing Green Belt boundaries to take account of the need to promote sustainable patterns of development.
- 6.8. Reflecting the above, the NPPF states at paragraph 85 that when defining boundaries, local planning authorities should, among others:
 - *"ensure consistency with the Local Plan Strategy for meeting identified requirements for sustainable development;*
 - Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
 - Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- 6.9. The existing infrastructure, including connections with the M6 Junction 11, A460 and potential for the M54-M6/M6 toll link road to pass through the site area, combined with accessibility to the Pentalver rail freight terminal at Cannock and employment opportunities for local workers combine to provide a sustainable location for growth relating to the social and economic dimensions.
- 6.10. There are also opportunities for development of the Site to limit impacts on the environmental dimension of sustainability through the retention of woodland, tree belts and riparian vegetation along watercourses. Biodiversity enhancements may also be provided through SUDS and provision of open spaces managed for wildlife benefits. There are also opportunities to enhance public access and amenity within the site whilst limiting landscape and visual impacts of development on the surrounding area through the use of structure planting to boundaries and siting of development on the site.
- 6.11. Furthermore, as recognised within the Council's Green Belt Review, with 80% of South Staffordshire District comprising Green Belt, given the restrictive nature of the designation there is a risk of development 'leapfrogging' to sites beyond the Green Belt boundary, resulting in unsustainable patterns of development³⁶.
- 6.12. As detailed within representations prepared by JLL to support the promotion of land at Hilton Park, the sustainability credentials and review of Green Belt sites for allocation within the preferred options consultation SAD comprise exceptional circumstances and justify consideration of Site for release from the Green Belt.

³⁶ South Staffordshire Partial Green Belt Review, January 2014: paragraph 2.20, page 5



Local Plan Strategy for Sustainable Development

- 6.13. Whilst the Core Strategy identifies a sequential approach for the allocation of land for residential development within the Spatial Strategy (Core Policy 1), the removal of land from the Green Belt for employment purposes is limited to the extension of the four existing SES's. These existing employment sites are inset within the Green Belt and include areas of land that are situated close to, but separated from the main urban areas and settlements outside the Green Belt by major roads.
- 6.14. A precedent has therefore already been set within the District for employment sites to be removed from the Green Belt, including locations close to and separated from existing settlements whilst adjacent land uses including motorways and main roads remain within the Green Belt. This is an approach that is continuing to be supported by the Council through their approach to favouring the expansion of the existing SES's in these locations.
- 6.15. Although the land at Hilton Park is separated from existing settlements, it is bounded by roads which provide a strong defensible boundary and limit encroachment into the wider countryside or unrestricted sprawl.

Viability of other Sites

6.16. Given the uncertainty concerning the viability of development and well documented access constraints for ROF Featherstone, there may be a need for the provision of alternative, sustainable locations for employment provision in order to meet the identified employment land for the District within the current plan period to 2028. As identified within the Green Belt Review contained in this report and representations prepared by others, the land at Hilton Park would be deliverable, providing a sustainable and well-connected location for economic growth and development.

Defining Boundaries

- 6.17. Having identified that the release of land at Hilton Park as an allocation site within the emerging Local Plan SAD would fit within the Core Strategy's Spatial Strategy for the release of land from the Green Belt for employment, consideration is now given to the NPPF's requirement for boundaries to:
 - Not need to be altered at the end of the development plan period; and
 - Be defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 6.18. Having regard to these requirements as set-out at paragraph 85 of the NPPF, the existing roads bounding the land at Hilton Park provide recognisable, permanent boundaries that could clearly and robustly define the release of land from the Green Belt.
- 6.19. As discussed above, there are opportunities to enhance existing tree belt and woodland planting to site boundaries along these roads to further strengthen the boundaries, containing the area both physically and visually and reducing impacts associated with the proximity to Shareshill and properties along Hilton Lane.
- 6.20. The justification for the use of the roads as boundaries is supported by the following considerations:
 - The A460 acts as a significant boundary to Shareshill, limiting encroachment. Ribbon development along Hilton Lane and the service station on the A460 also serve to reduce the



opportunity for development adjacent to Shareshill to encroach and further limit separation with the settlement.

- Beyond Shareshill the land does not lie adjacent to or within close proximity to other settlements, being separated from development at Cheslyn Hay to the east by the M6.
- The existing rounds bounding the Site provide significant robust and defensible boundaries for a wider strategic release of the land as a whole.
- The strong containment of the site by existing roads also serves to limit any further outward development, ensuring that the revised Green Belt boundary would endure beyond the plan period.
- 6.21. This Green Belt Review has assessed the contribution that land at Hilton Park makes to the Green Belt as being comparable to land at i54 and ROF Featherstone that is being proposed for employment allocation within the South Staffordshire Preferred Options SAD Consultation. The site is situated within a sustainable location and is defined by strong boundaries formed by the M6 motorway, A460 and Hilton Lane. These would be robust, permanent and defensible in the long term. There are opportunities to strengthen existing boundary planting, retain and enhance Green Infrastructure within development of the site and respect the visual amenity of nearby residents. Taking into account the above factors, it is recommended that the land at Hilton Park be released from the Green Belt to provide land for a Strategic Employment Site.



Appendix 1: Extract from the South Staffordshire Site Allocations Document (SAD) 'Preferred Options' Consultation, December 2015 – Policy SAD6: The Preferred Option Employment Land Allocations



Land at Hilton Park, M6 Junction 11 Green Belt Review

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9. Employment Land

Planning for employment in South Staffordshire:

- Employment provision must conform with the Core Strategy.
- We need to tackle the economic challenges in the district, including areas of below average household incomes and below average skills levels
- We want to ensure that our four freestanding Strategic Employment Sites are protected and continue to play a key role in delivering economic growth in the district
- We want to protect the employment provision in the district, and continue to complement, and support, that of the Major Urban Area (MUA) and not jeopardise the urban regeneration of the Black Country
- We recognise the role of tourism and conservation in economic prosperity to make the district attractive for inward investment
- Where supported by communities, we aim to maximise opportunities to include small scale employment units as part of mixed use development
- We will promote rural diversification, including that of the agricultural economy and the provision of work units in sustainable locations
- Our aim is to promote opportunities for sustainable and sympathetic rural economic growth and diversification, whilst protecting the environment
- To support the aims and ambitions of the emerging Staffordshire and Stoke-on-Trent Local Enterprise Partnership (SSLEP)
- 9.1 The Core Strategy identifies the Council's aim to sustain and develop the local economy of South Staffordshire throughout the plan period by creating opportunities for existing employment, inward investment and further economic development of the district. It is also important to recognise the constraints that exist in the district, most notably the need to limit detrimental impacts on the Green Belt. Additionally, it is also vital that we support the urban regeneration of the Black Country MUA by encouraging the reuse of brownfield land in the MUA first and foremost.
- 9.2 For the purposes of the Site Allocations Document, the term employment refers to B uses classes (Use Class Order 1987 amended 2010) as follows:
 - B1: Business
 - (a) Offices other than in use within Class A2
 - (b) Research and Development (Laboratories, Studios)
 - (c) Light industry
 - **B2**: General Industrial (other than as classified in B1)
 - **B8**: Storage and distribution Storage and distribution centres (wholesale warehouses, distribution centres and repositories)
- 9.3 The Core Strategy has an overarching policy EV1 to safeguard existing employment land and premises and employment allocations for

employment use; whilst recognising that circumstances may arise where the lack of viability of an existing business or operation may justify its loss if supported by a business case. Since the Core Strategy was adopted, a new Employment Land Study has been carried out that identifies the existing 'good and best employment sites' in the district, which make up our portfolio of employment land in the district. The table below reflects an updated position to the Core Strategy.

9.4 The following sites contribute to the Council's employment land supply and are protected for such uses, subject to policy EV1:

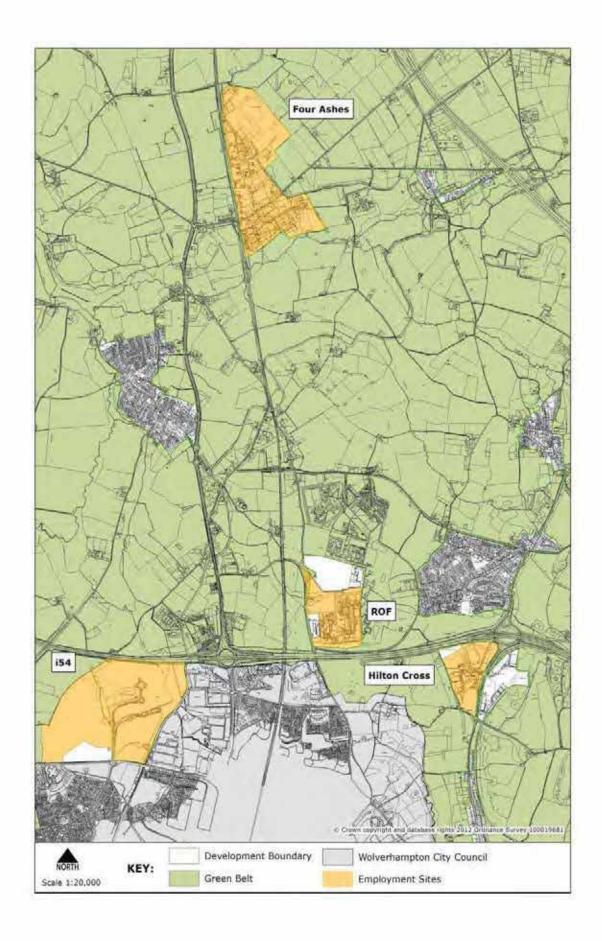
Site Name	Parish	Site Area (ha)	Available land for general employment 2015-2028
Hepworth Site, Warstones Road, Essington	Essington	3.81	
Acton Gate (Argos warehouse)	Dunston	13.74	
Acton Plaza	Dunston	0.79	0.79ha
Littleton Business Park, Littleton Drive, Huntington	Huntington	2.73	
Huntington Industrial Estate, Huntington	Huntington	1.09	
STRATEGIC SITE Four Ashes Industrial Estate, Four Ashes (including Bericote Four Ashes)	Brewood and Coven	72	20.60ha (Bericote Four Ashes)
Hawkins Drive Industrial Estate, Cheslyn Hay	Cheslyn Hay	12.01	0.25
Coppice Lane, Cheslyn Hay	Cheslyn Hay	7.3	
Landywood Lane Industrial Estate, Cheslyn Hay	Cheslyn Hay	6.48	
Loades Plc, Gorsey Lane	Great Wyrley	1.06	
Landywood Enterprise Park, Great Wyrley	Great Wyrley	3.43	
Essington Light Industrial Estate, Bognop Road, Essington	Essington	0.78	
Hilton Main Industrial Estate (including Vernom Park)	Featherstone	12.83	2.79ha (Vernom Park)
STRATEGIC SITE			
Hilton Cross Business Park, Featherstone	Featherstone	18.42	4.84ha
Paradise Lane, Slade Heath	Featherstone	2.7	
STRATEGIC SITE ROF Featherstone	Featherstone	24	14ha

Former MOOG site, GE Aviation Mechanical Systems, off Wobaston Road/Barnhurst Lane, Bilbrook	Bilbrook	7.13	
Balliol Business Park, Wobaston Road/Barnhurst Lane, Bilbrook	Bilbrook	6.55	
Kingswood Business Park, Kingswood	Perton	0.96	
Heathmill Road Industrial Estate, Wombourne	Wombourne	20.73	
Ounsdale Road Industrial Estate, Wombourne	Wombourne	2	1.06ha*
Smestow Bridge Industrial Estate, Wombourne	Wombourne	21.1	
Wombourne Enterprise Park	Wombourne	3.88	
Wolverhampton Business Airport, Bobbington	Bobbington	11.72	
Lowes Business Premises - Lowes Garage*	Kinver	0.33	
STRATEGIC SITE			8.91ha (RIS
i54 South Staffordshire Site, Wobaston Rd	Bilbrook	90.5	half of the site)
Dunston Business Village	Dunston	2.33	
Hobnock Road, Essington	Essington	5.2	5.2
Hectares of land available for em	oloyment 2016-2	2028	58.4ha

* Identified as 'other' quality in 2013 ELS.

The Four Freestanding Strategic Employment Sites

- 9.5 The Core Strategy states that there is sufficient employment provision to meet the needs of the district beyond the plan period, and as a result the Core Strategy proposed no additional employment land up to 2028. The Core Strategy however committed us to refreshing our 2009 Employment Land Study (ELS) as part of updating our Local Plan evidence base. Our strategic approach is that any identified employment need will largely be met by developing land within the boundaries of the district's four freestanding Strategic Employment Sites, or as modest extensions to these sites, where justified by robust evidence. These four sites are:
 - i54 South Staffordshire
 - ROF Featherstone
 - Hilton Cross
 - Four Ashes



i54 South Staffordshire

9.6 The i54 South Staffordshire Strategic Employment Site is in Locality 4 and borders Wolverhampton, with excellent links to the highway network via Junction 2 of the M54. The site first came forward as a Major Investment Site and was granted outline planning permission in 2005 for B1 and B2 class employment. Development of the site is now well underway with aerospace firm Moog Aircraft Group and laboratory testing company Eurofins having moved onto the site. In 2011, Jaguar Land Rover had an application approved for an advanced engine facility (Module 1) with works on the site commencing in 2012. Since then an extension to the JLR advanced engine facility has been approved (Module 1a), along with ISP Printers moving onto i54 South Staffordshire. There are still a number of available plots on the eastern half of the site for B class employment. On the eastern part of the site there is circa 8.91ha of land available for employment (not including the plot earmarked for the hotel). On the western part of the site, permission has been granted for 19.2ha for the final phase of JLR. The site has been identified as part of an Enterprise Zone and we are keen for it to fulfil its potential as an advanced manufacturing/aerospace hub that attracts inward investment to the area.

Royal Ordnance Factory (ROF), Featherstone

9.7 ROF Featherstone is a former Royal Ordnance Factory located in Locality 3 to the west of Featherstone which was identified for B1 and B2 employment use in both the 1996 Local Plan and reaffirmed in the adopted the Core Strategy in 2012. The site remains vacant and/or derelict and despite having policy support in the Local Plan, has not come forward for development. However, in September 2012 an application for B1 and B2 uses was approved subject to a Section 106 agreement. Since then the site has changed ownership and the application subsequently withdrawn. The Council commissioned an independent study of ROF Featherstone in 2014 in order to understand why the site has not come forward, including issues around marketing and the apparent poor accessibility to, and the viability of, the site. The study identifies constraints, and what options are available to address them in the Site Allocations Document. The full study can be viewed on our website at www.sstaffs.gov.uk/localplans It has been suggested that modest extensions could enhance the viability of the site by facilitating an improved access, and in turn improve local amenity.

Hilton Cross

9.8 Hilton Cross Business Park/ Mercury Park sits in Locality 3 south of Featherstone and Junction 1 of the M54 and the site came forward as a Regional Investment Site for B1, B2 and B8 use. The site is bounded to the north by the M54, to the south by the Moseley Road, with Green Belt and an implemented landscape buffer to protect the setting of Moseley Old Hall to the west of the site. To the east of the site is Hilton Main Industrial Estate/Vernon Park.

Four Ashes

9.9 Four Ashes is a well-established freestanding employment site located to the east of the A449 in Locality 2 and in the parish of Brewood and Coven. In total the site is approximately 74 hectares in size and has a mixture of B1, B2 and B8 uses and the recent development of a Waste to Energy facility. There is currently circa 21ha of developable land off Gravelly Way, known as Bericote Four Ashes, with permission for B8 use.

Employment Land Studies (ELS)

- A refresh of the South Staffordshire ELS was undertaken in 2012; 9.10 concluding that there was a slight oversupply of employment land within the district of 12.3ha and supported the adopted Core Strategy position. Based on this evidence alone, and considering South Staffordshire in isolation, there is no evidence to justify modest extensions to any of the four freestanding Strategic Employment Sites. However the 2012 ELS did conclude that in meeting employment needs, South Staffordshire has strong links with other parts of the sub region, in particular the Black Country. Recommendations in the ELS were that the employment relationship between South Staffordshire and the Black Country be explored further in the form of a larger cross boundary employment study. As part of this, the study should consider whether it would be appropriate for employment need arising from the Black Country to be accommodated in or around any of the four freestanding Strategic Employment Sites in South Staffordshire.
- 9.11 Following this recommendation, the Council, in partnership with Staffordshire County Council and the Black Country authorities, commissioned a wider cross boundary employment study. Further work to determine if a need exists for new 'strategic employment sites' across the region has also been completed in partnership with other Local Authorities across the West Midlands. The West Midlands Strategic Employment Sites Study 2015 is similar to that previously carried out some years ago which resulted in the identification of two regional sites - i54 South Staffordshire and Hilton Cross.

New Employment Land in South Staffordshire

- 9.12 The Core Strategy supports 'modest extensions' to the four freestanding Employment Sites (i54 South Staffordshire, ROF Featherstone, Hilton Cross and Four Ashes) where robust evidence and reasoned justification is provided to support their expansion. In addition, the Core Strategy makes further allowance for employment uses as part of a mixed use development in the Main Service Villages where justified. The intention is that where there is evidence to support a 'modest extension' and or mixed use development that this would be allocated through the Site Allocations Document.
- 9.13 The suite of Employment Land Studies to date since the adoption of the Core Strategy, including the sub-regional ELS 2015, have identified that there is a gap of 101ha of High Quality (HQ) employment between 2014-

2026. After taking account of potential HQ sites within the Black Country likely to come forward, the gap reduced to circa 81-87ha.

- 9.14 The sub-regional ELS 2015 concluded that it is not for South Staffordshire to meet the entirety of this shortfall as a significant part of the identified need originates from Sandwell where there is little travel to work connectivity with South Staffordshire. The sub-regional ELS 2015 concluded that the national significance and market attractiveness of i54 South Staffordshire, and the policy requirement and need to deliver ROF Featherstone, marked these out as the priority sites that would be able to meet a significant proportion of the Black Country shortfall of High Quality Employment land between 2014-2026. The West Midland Strategic Employment Sites Study 2015, commissioned in 2014 by Local Authority Chief Executives across the West Midlands, also supported this broad location as a regionally significant and attractive location for national and international economic development.
- 9.15 At the time of writing the 'Preferred Options' SAD, no specific evidence had been demonstrated for employment uses to come forward as part of a mixed use development in the Main Service Villages.

Policy SAD6: The Preferred Option Employment Land Allocations

Site	Site Ref No.	Site Location	Employment Land delivery (ha)	Use Class
i54 South	E7 & E8	Land west of i54	40ha extension	B1, B2
Staffordshire			allocation	
ROF Featherstone	E1* & E3*	Land east and west of ROF Featherstone*	Up to 50% extension above the existing 24ha site = 12 ha of additional employment land allocation plus additional 10 ha employment land in development boundary*	B1, B2, B8*
Total new suppl	y of employmer	nt land	62ha	•

The following additional employment land as extensions to our strategic employment sites in South Staffordshire is proposed:

Total new supply of employment land

* Support in principle subject to further evidence and the delivery of a new access road.

i54 South Staffordshire

Land to the west of i54, as highlighted on the map below, will be removed from the Green Belt as an extension to the employment site, and protected for B1 and B2 uses, in line with the policies and planning permissions on the existing site.

ROF Featherstone

The principle of allocating additional employment land at ROF Featherstone is supported, in order to cross subsidise and facilitate the delivery of a new access road. Support 'in principle' for additional employment land is embedded in an enabling development component of delivering a strategic scheme and subject to further detailed assessments, including highways, landscape and viability assessments. The Council supports up to a 50% extension to this site to contribute towards project delivery. ROF Featherstone, as currently designated, is a 24ha site with 14ha of B1, B2 employment land, and 10ha of landscaping and planting within the development boundary. It is proposed that the 24ha site be considered in its entirety, and the 10ha of landscaping and planting should be delivered outside of the site boundary in the Green Belt to the east of the site, to protect the amenity of Featherstone village.

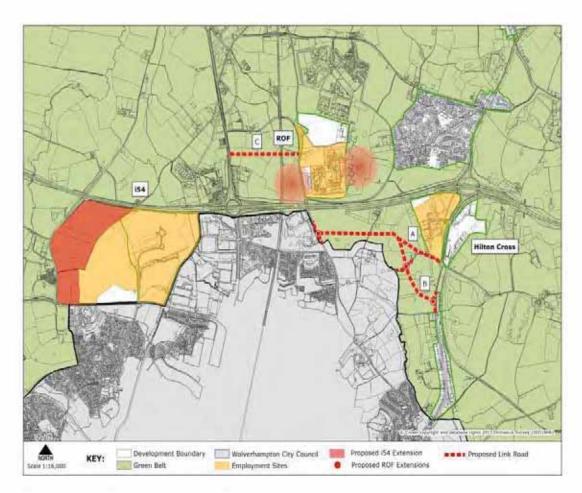
Without the implementation of a new access road to release the site for employment uses, there is no justification for B8 use on site, or an extension to ROF Featherstone.

The Council will continue to work with the owners and stakeholders to prepare a Masterplan for the site to come forward, setting out the long term vision and aspirations for the site. Proposals for the site should be in accordance with a Masterplan to be submitted to the Council for approval following consultation with the Council's Statement of Community Involvement (SCI).

Delivery of new employment land at i54 South Staffordshire and ROF Featherstone will be delivered in accordance with Development Management policies within the adopted Core Strategy.

Accessing ROF Featherstone

9.16 Throughout the preparation of the SAD, the Council has continued to work positively with the owners of ROF Featherstone and relevant stakeholders to understand and address the issues surrounding the delivery of the site, and consider options for improving access. At the time of preparing the 'Preferred Options', the Council's 'in principle' preferred access solution to ROF Featherstone is to deliver a new road to the south of the M54 utilising the existing motorway underpass on Cat and Kittens Lane. The new access road would preferably join up to the existing roundabout on Bognop road and would represent the most cost effective solution and result in the most direct improved access to the strategic highway network. This option (**Option A** on the illustrative map) is being explored further by all parties and subject to further detailed assessments, including highways feasibly and viability, landscape, amenity, and an assessment of the impact on the setting of the heritage asset at Mosely Old Hall.



9.17 The 'Preferred Options' employment land site extensions:

- 9.18 The map also includes an **Option B** route, which would be considered if A is not achievable; however this route is not as direct a link to the strategic highway network, and does raise further issues for consideration, including residential amenity.
- 9.19 The ROF Featherstone Viability Report 2014 identified 6 access options, from which the Council's 'in principle' preferred access solution (illustrated above) originated. A number of options, whilst feasible, were not considered further due to high costs associated with crossing the West Coast Mainline. The Council will continue to work positively to consider the most suitable option for the site and local residents should further work demonstrate that a previously discounted alternative access option incorporating crossing the West Coast Mainline (**Option C** on the map) is more suitable in planning or economic benefit terms.
- 9.20 The broad locations for proposed extensions to ROF Featherstone have been identified in the 'Preferred Options' consultation document. The exact extent of the extensions will be agreed as part of a Masterplan with site promoters, following publication of the 'Preferred Options' SAD document; having regard to the further work ongoing identified in policy SAD6 and material planning considerations including, the Green Belt Review, accessibility, and landscape impact. The defined boundaries will be set out in the final SAD.

9.21 The Council will also need to consider the implications of the Highways England preferred solution to the proposed new northern motorway link road connecting the M54/M6/M6(TOLL). An announcement is expected in December 2015.

Other employment sites in South Staffordshire

9.22 The 'Preferred Options' SAD does not propose any additional employment land release in South Staffordshire, other than land identified in '*Policy SAD6: The Preferred Option Employment Land Allocations'*. It is not appropriate for South Staffordshire to meet the entire Black Country High Quality employment land shortfall, and the sub-regional ELS 2015 recommended that any residual High Quality employment land requirements be considered in the review of both the Black Country and South Staffordshire Local Plans. This will ensure that a comprehensive strategic review of employment sites can take place and deliver land in the right locations. Employment land will be considered in accordance with '*Policy SAD1: The Local Plan Review'*. Appendix 2: Extracts from the South Staffordshire Partial Green Belt Review Method Statement, September 2014 -Appendix 1 – Review Criteria Title



Land at Hilton Park, M6 Junction 11 Green Belt Review

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Appendix 1 - Review Criteria

NPPF Green Belt Purposes	Issues for consideration	Criteria	Value
To check the unrestricted	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	lf yes, +++ If no, +
sprawl of large built-up areas.	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +
To prevent neighbouring towns merging into one	Location of the parcel.	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +
another.	Type and location of physical boundaries bordering/separating parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +

January 2014

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NPPF Green Belt Purposes	Issues for consideration	Criteria	Value
	Significance of existing urbanising influences. ¹² Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man- made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant/less significant boundary between the parcel and the neighbouring settlement, ++ If significant boundary(s) between the parcel and the neighbouring settlement, +
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements.	Does the settlement contain significant areas of brownfield land? (Only applies to one settlement)	If yes, ++ If no, +

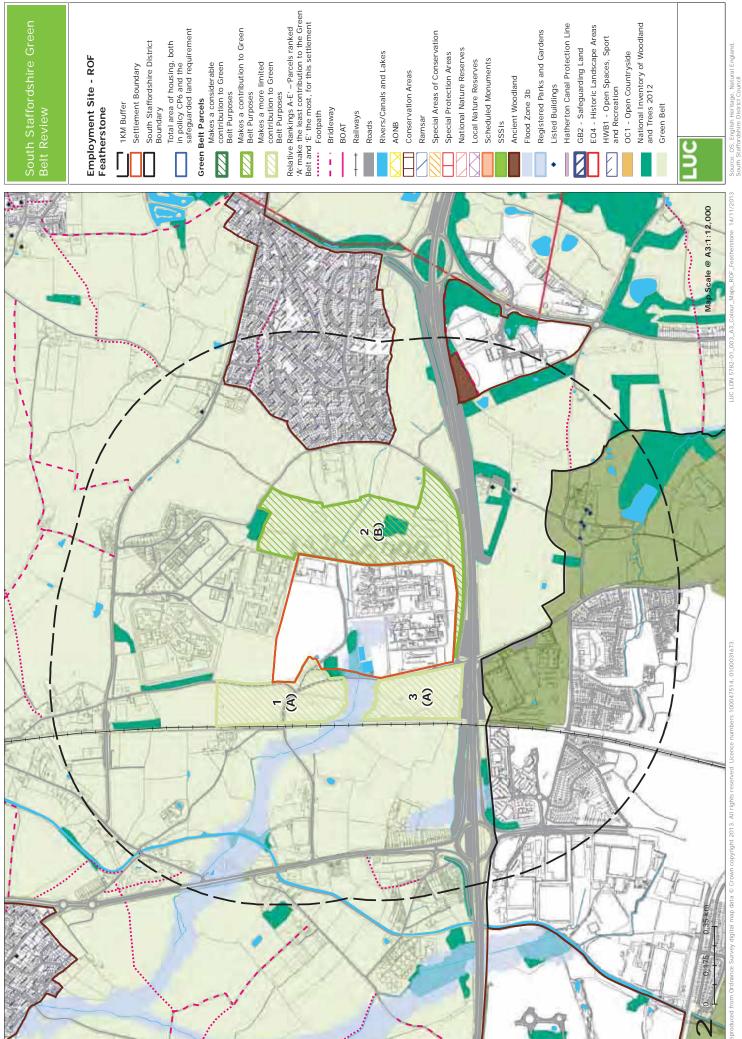
¹² The significance of existing urbanising influences has a direct influence over the relative openness of green belt parcels. We have therefore used the presence of urbanising influences as a proxy for assessing the degree of openness within the parcel.

Appendix 3: Extracts from the South Staffordshire Partial Green Belt Review Method Statement, September 2014 – Findings of Assessment (tables and maps) for Strategic Employment Sites



Land at Hilton Park, M6 Junction 11 Green Belt Review

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Overall Parcel Judgement

Makes a more limited contribution to Green Belt Purposes

General Commentary

Reasonably close to Coven; however the prison and the hamlet to north and east diminish the significance of the separating role the parcel plays. Railway line is raised defensible boundary. Also waterway to west and major roads to north west

NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+ Wolverhampton less than 1km to south
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	++
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ Coven 1km to north west; however the prison and the hamlet to north and east diminish the significance of the separating role the parcel plays.
To prevent neighbouring towns merging into one	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+ railway line is raised defensible boundary. Also waterway to west and major roads to north west
another.	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between	+ railway line is raised defensible boundary. Also waterway to west and major roads to north west

	Overall Parcel Judgement				
			the parcel and the neighbouring settlement, +		
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	 + + Pylons. Partially visible from M54. Openness restricted by raised railway line to west and mature trees. Very visible west of Paradise Lane 	
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	+ railway line is raised defensible boundary. Also waterway to west and major roads to north west	
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+	
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A	
To assist in urban regeneration, by encouraging the recycling of derelict and	The need to incentivise development within	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	++ very close to west of ES (only site in South Staffordshire)	

		Overall Parcel Jud	gement	
other urban land.	settlements			

Overall Parcel Judgement

Makes a contribution to Green Belt Purposes

General Commentary

<500m to Featherstone; however already some merging between two urban areas due to industrial and brownfield encroachment. Open views from East Road and Brookhouse Lane.

NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments
To check the unrestricted sprawl of large	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+ less than 500m to South
built-up areas.	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	++ towards Featherstone
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ <500m east to Featherstone; however already some merging between two urban areas due to industrial and brownfield encroachment. ²
To prevent neighbouring towns merging into one	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+ due to existing encroachment.
another.	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between	++ Brownfield site bordering Featherstone. ³

¹ Definitions in method statement

² See exceptions to rule in method statement.

³ See exceptions to rule in method statement.

	Overall Parcel Judgement				
			the parcel and the neighbouring settlement, +		
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	++ Encroached by industrial buildings and abutting brownfield site to east. Open views from East Road and Brookhouse Lane	
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	++ Area already compromised by industrial buildings and brownfield site to the east. ⁴	
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+	
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A	
To assist in urban regeneration, by encouraging the recycling of	The need to incentivise development within	Does the immediate area contain significant areas of	If yes, ++	++ very close to west of ES (only site in South Staffordshire)	

⁴ See exceptions to rule in method statement.

	Overall Parcel Judgement					
derelict and other urban land.	settlements	brownfield land?	If no, +			

Overall Parcel Judgement

Makes a more limited contribution to Green Belt Purposes

General Commentary

M54 borders southern boundary of parcel. Wolverhampton is the other side of M54 giving impression of connection to urban sprawl of Wolverhampton from M54. However, limited views and physical separating influence to west due to raised railway line and south due to motorway.¹

NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ²	Assessment and Comments
To check the unrestricted sprawl of large	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++ If no, +	+ Wolverhampton the other side of M54.
built-up areas. Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	+ Raised M54 with no access to parcel.	
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ Wolverhampton less than <500m away but other side of M54 ³ .
To prevent neighbouring towns merging into one	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+ M54 significant separating feature.
another.	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant	++ Raised M54 to south and raised railway line to west.

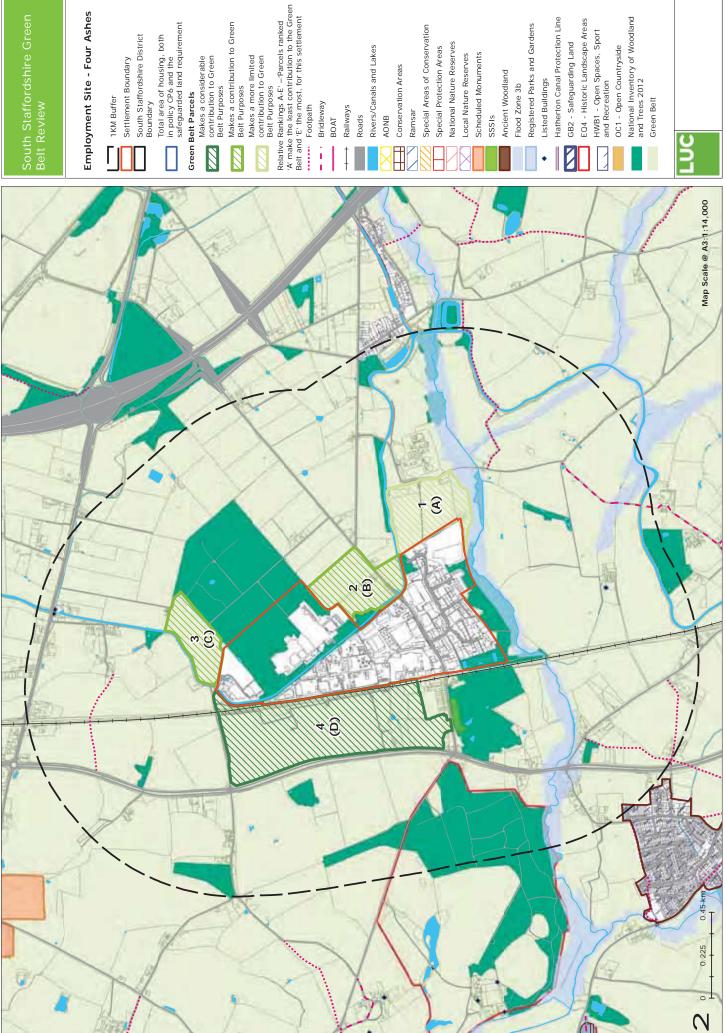
¹ See exceptions to rule in method statement.

² Definitions in method statement

³ See exceptions to rule in method statement.

	Overall Parcel Judgement					
			boundary(s) between the parcel and the neighbouring settlement, +			
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	 + + Pylons. Visible from M54. Openness restricted by raised railway line to west and mature trees. 		
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	++ Raised railway line to west protecting open countryside. No land other than parcel between M54 and Wolverhampton (encroachment of remaining countryside).		
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+		
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A		
To assist in urban regeneration, by encouraging the recycling of derelict and	The need to incentivise development within	Does the immediate area contain significant areas of brownfield land?	lf yes, ++ If no, +	++ very close to west of ES (only site in South Staffordshire)		

		Overall Parcel Jud	gement	
other urban land.	settlements			



Overall Parcel Judgement							
	Makes a more limited contribution to Green Belt Purposes						
		General Comme	ntary				
Significant bound	aries on all sides.	1	1				
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments			
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+			
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	+ no road			
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ Village of Calf Heath <1km to east			
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+ Canal and Sewage works in between ES and village			
neighbouring towns merging into one another.	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+ Canal and Sewage works in between ES and village flanked by woodland to the north and a water way to the south.			

Settlement: Four AshesDirection: EastParcel Number: 1

		Overall Parcel Jud	gement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	++ sewage works to the north
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	+ Canal and Sewage works in between ES and village flanked by woodland to the north and a water way to the south.
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+ footpath 100m to south
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	+

Overall Parcel Judgement					
Makes a contribution to Green Belt Purposes					
		General Comme	ntary		
Enclosed to the n	orth, south and west	but open towards village	e of Calf Heath		
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments	
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+	
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	++ road on southern boundary	
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ Village of Calf Heath <1km to east	
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+ not immediately between ES and village	
•	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+ Minor roads, canal and sewage works in between ES and village	

Settlement: Four AshesDirection: EastParcel Number: 2

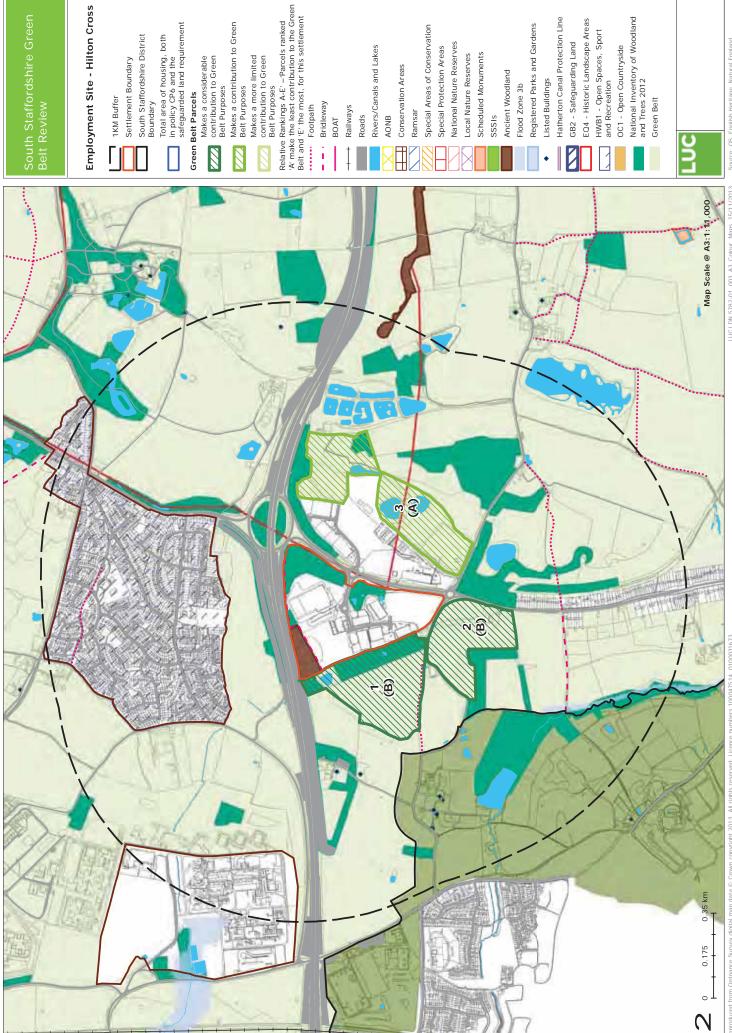
		Overall Parcel Jud	gement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	++ industrial estate to north west
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	+ Minor roads, canal and sewage works in between ES and village
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	+

Overall Parcel Judgement				
	Make	s a contribution to Gre	en Belt Purposes	
		General Comme	ntary	
Generally open to	o north.			
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	++ along road
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	+ MSV of Penkridge 4km to north
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+
•	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+ Canal, waterway and agricultural college.

		Overall Parcel Jud	gement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	++ largely open to the north towards hamlets and surrounding countryside, including the canal. One cluster of buildings on northern side of canal.
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	+ canal on northern boundary, minor roads and agricultural college beyond.
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+ Bridleway 100km to north
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	++ Scheduled Monuments 1.5km to north west
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	+

Overall Parcel Judgement						
	Makes a considerable contribution to Green Belt Purposes					
		General Commer	ntary			
Very open to wes	and north.					
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments		
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+		
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	++ in all directions		
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ MSV Brewood 1.5km to west		
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+		
neighbouring towns merging into one another.	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+ A449, HLA and water way near Brewood		

		Overall Parcel Judg	jement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	+++ open with views to the north and west towards Brewood
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, ++ If less significant boundary between the parcel and the neighbouring settlement, ++ If significant boundary(s) between the parcel and the neighbouring settlement, +	+ A449, HLA and water way near Brewood
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	+



Source: OS, English Heritage, Natural England, South Staffordshire District Council

LUC LDN 5782-01_003_A3_Colour_Maps

Overall Parcel Judgement						
	Makes a considerable contribution to Green Belt Purposes					
		General Comme	ntary			
Performs an impo	ortant separation role	e between ES and Wolver	hampton and relatively o	pen		
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments		
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	lf yes, +++. If no, +	+ but close by		
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	+ not on road		
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ Wolverhampton <1km to south west		
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	++ yes		
neighbouring towns merging into one another.	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+++ Only farm and fields and minor roads		

Settlement: Hilton Cross Direction: West

		Overall Parcel Jud	gement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	+++
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	++ Only farm and fields and minor roads
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	++ bridleway
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	++ next to Featherstone and Featherstone Employment Site 500m to the north

Overall Parcel Judgement						
	Makes a considerable contribution to Green Belt Purposes					
		General Comme	ntary			
Performs an impo	ortant separation role	e between ES and Wolver	hampton and relatively o	pen		
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments		
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	lf yes, +++. If no, +	+++ ribbon development from Wolverhampton to south		
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	++ would join ES to ribbon development out of Wolverhampton in south		
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ Wolverhampton <1km to west		
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	++ yes only open land preventing separation between ES and WIvptn		
	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+++ fragmented woodland		

		Overall Parcel Jud	gement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	++ Pylons and mobile home garage.
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	+++ fragmented woodland
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+ yes but not abutting parcel
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	++ next to Featherstone and Featherstone Employment Site 500m to the north

Overall Parcel Judgement

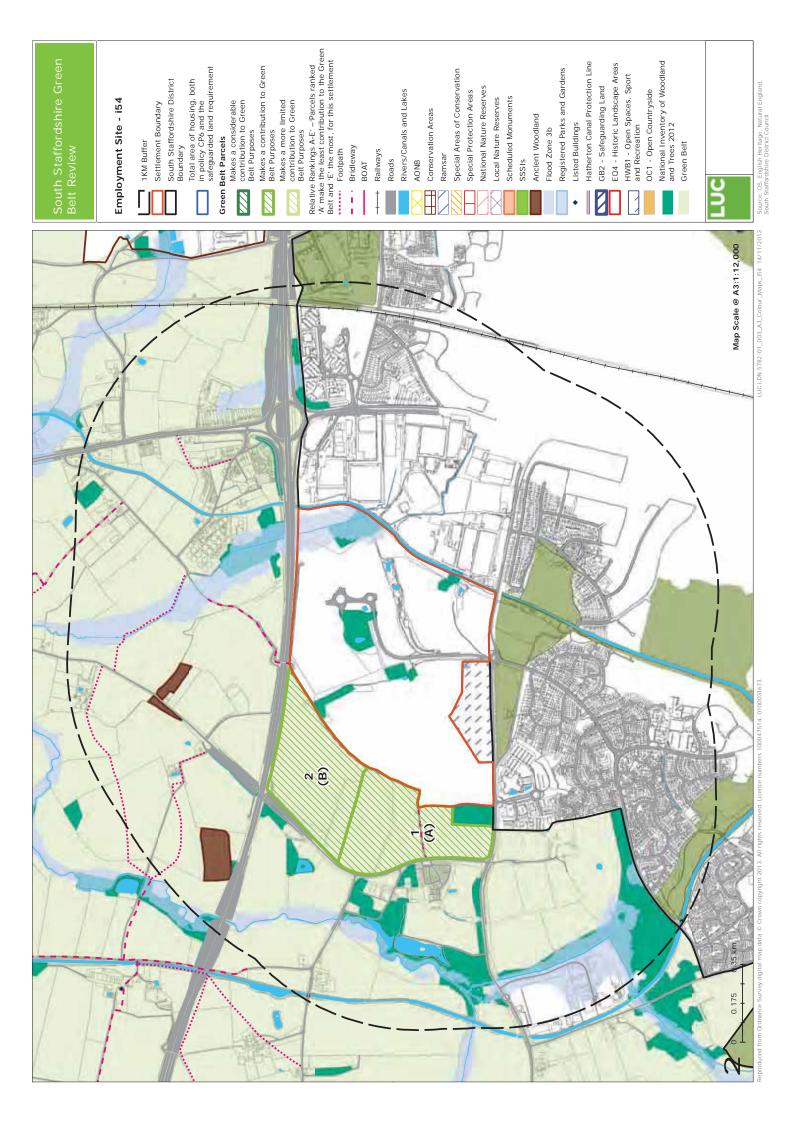
Makes a contribution to Green Belt Purposes

General Commentary

Has some value but relatively enclosed and protected parcel already compromised by gravel and sand extraction.

NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments
To check the unrestricted sprawl of large	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+ but close by
built-up areas.	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	+ Limited. Woodland on other side of road
To prevent neighbouring towns merging into one another.	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	++ Wolverhampton <1km to south but land contained by woodland
	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+ land contained by woodland
	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring	+ woodland and ponds

	Overall Parcel Judgement				
			settlement, +		
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	+ Sand and gravel pitt	
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	+ woodland and ponds	
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	++ Byway Open to All Traffic through centre of parcel	
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A	
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	++ next to Featherstone and Featherstone Employment Site 500m to the north	



Overall Parcel Judgement						
	Makes a contribution to Green Belt Purposes					
		General Comme	ntary			
Recently extende	d. Part of urban frin	ge of Wolverhampton.	1			
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments		
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+ Employment site next to Wolverhampton		
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	++ on road		
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	+ Abuts static caravan park with semi- permanent dwellings. MSV Codsall over 2km to west		
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+ no as part of Wolverhampton urban area		
neighbouring towns merging into one another.	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+ waterway and woodland		

		Overall Parcel Jud	gement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	++ Open fields next to static caravan park and allotments
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, + + If less significant boundary between the parcel and the neighbouring settlement, + + If significant boundary(s) between the parcel and the neighbouring settlement, +	+ waterway and woodland
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	++ Bridleway
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	+

Overall Parcel Judgement					
Makes a contribution to Green Belt Purposes					
		General Comme	ntary		
Open field next to	o M54 and neighbour	ing open field			
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value ¹	Assessment and Comments	
To check the unrestricted sprawl of large built-up areas.	Location in relation to the West Midlands urban area (Wolverhampton, Dudley, Walsall and Cannock).	Is the parcel abutting the boundary of Wolverhampton, Dudley, Walsall or Cannock?	If yes, +++. If no, +	+ Part of urban fringe of Wolverhampton	
	Ribbon development.	Does the parcel play a role in preventing ribbon development?	If strong role (i.e. it lies either side of a road corridor), ++ If no role, +	+ M54 but no easy connection to parcel	
	Distance between parcel and the nearest neighbouring settlement(s).	What is the distance to the nearest neighbouring settlement?	If abuts boundary or <500m, +++ If between 1km and 2km from boundary, ++ If more than 2km, +	+ MSW Brewood 2.5km to north west	
To prevent neighbouring	Location of the parcel	Does the parcel play a major role in maintaining separation? (This will partly be a function of the size of the parcel).	Major, ++ Minor +	+	
•	Type and location of physical boundaries bordering/separa ting parcels: motorways, railways, rivers or woods.	Are there natural or man-made features that could prevent settlements from merging with one another? (These could be outside the parcel itself).	If there is no significant boundary between the parcel and the neighbouring settlement, +++ If there is a less significant boundary, ++ If there is a significant boundary(s) between the parcel and the neighbouring settlement, +	+ waterway and woodland and M54	

		Overall Parcel Jud	gement	
	Significance of existing urbanising influences. Openness.	Has the parcel already been affected by encroachment of built development within the parcel?	If no encroachment, +++ If limited encroachment, ++ If already encroached upon, +	++ open field with limited encroachment from M54 bordering the parcel's northern edge.
To assist in safeguarding the countryside from encroachment.	Significance and permanence of boundaries / features to contain development and prevent encroachment.	Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel itself).	If no significant boundary between the parcel and the neighbouring settlement, ++ If less significant boundary between the parcel and the neighbouring settlement, ++ If significant boundary(s) between the parcel and the neighbouring settlement, +	+ waterway and woodland and M54
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or informal sport and recreation)? (Accessible countryside on the doorstep.)	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	++ bridleway
To preserve the setting and special character of historic towns.	Contribution of parcel to setting and special character of settlement.	Are there features of historic significance in the parcel or visible from the parcel?	If yes and in/abutting the parcel, +++ If yes and not abutting the parcel, ++ If no, +	N/A
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	+

Plans

Plan 1 – Site Location and Photoviewpoint Locations (10246/P04a)

Plan 2 – Assessment Parcels (10246/P02a)

Plan 3 - Assessment Summary (Hilton Park) (10246/P03a)

Plan 4 – Assessment Individual Green Belt Purposes (Hilton Park) (10246/P07)

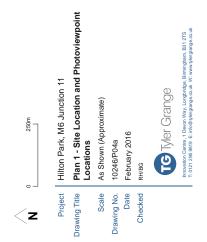
Plan 5 – Comparative Assessment with Strategic Employment Sites (10246/P01a)

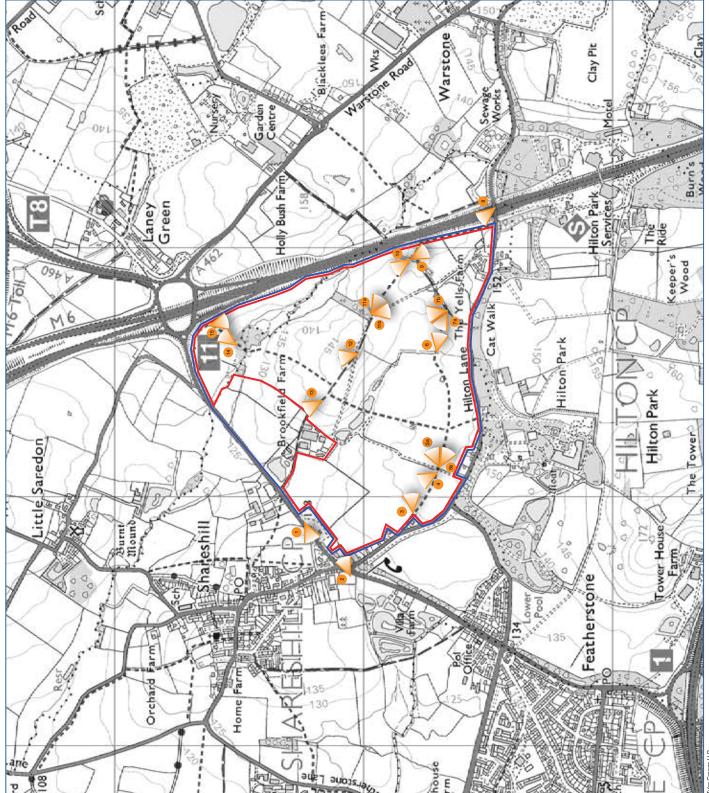
Photoviewpoints 1 - 15 (10246/P06a)



Land at Hilton Park, M6 Junction 11 Green Belt Review







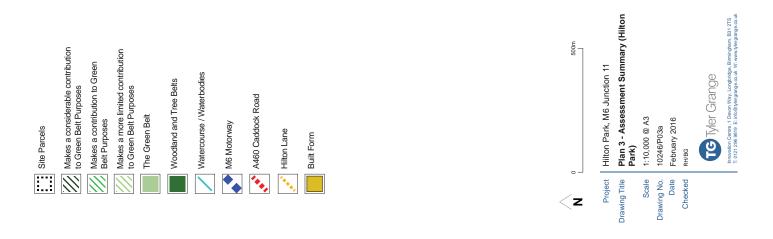
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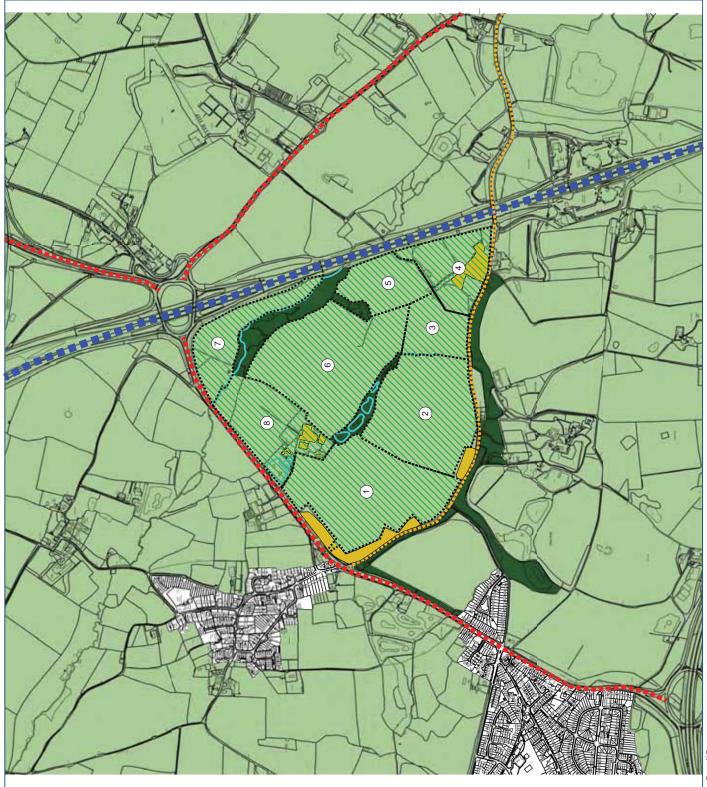


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Site Parcels





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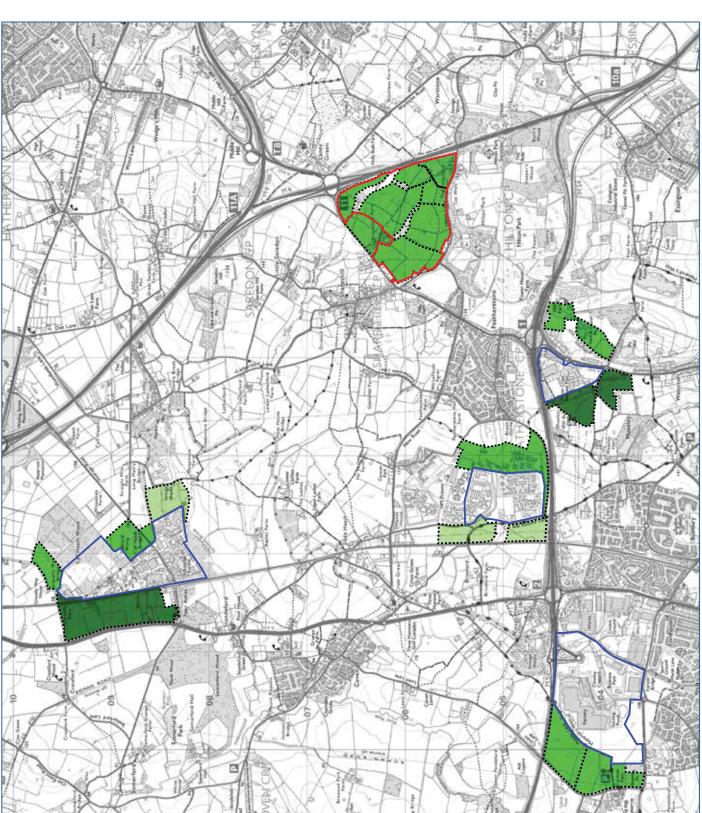


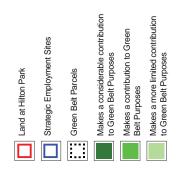




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Photoviewpoints 1 and 2 Drawing Title

Hilton Park, M6 Junction 11 Project

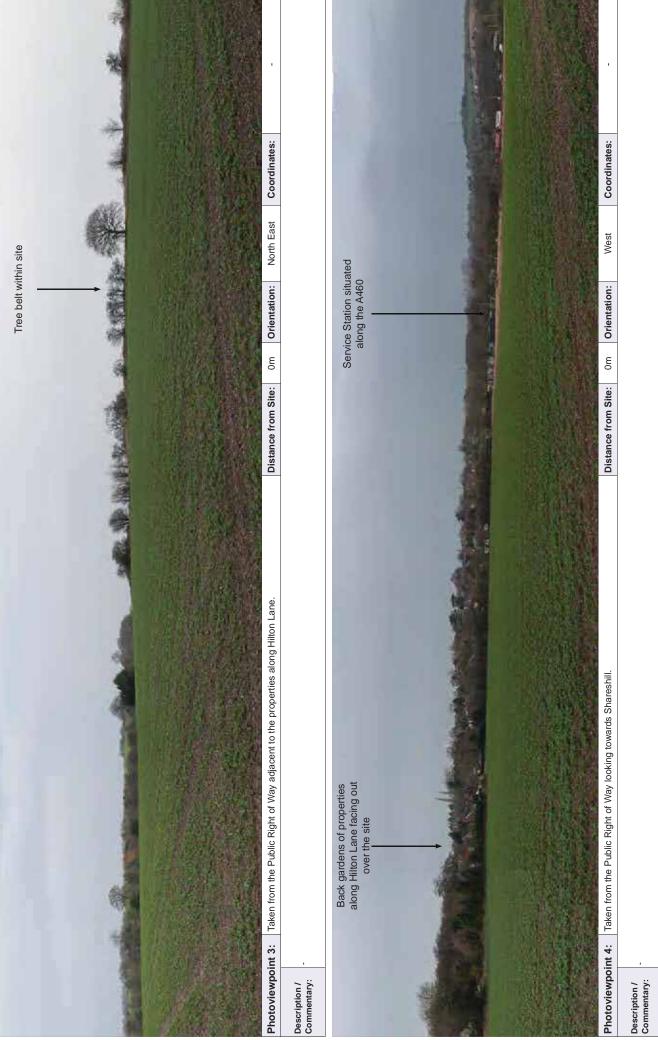
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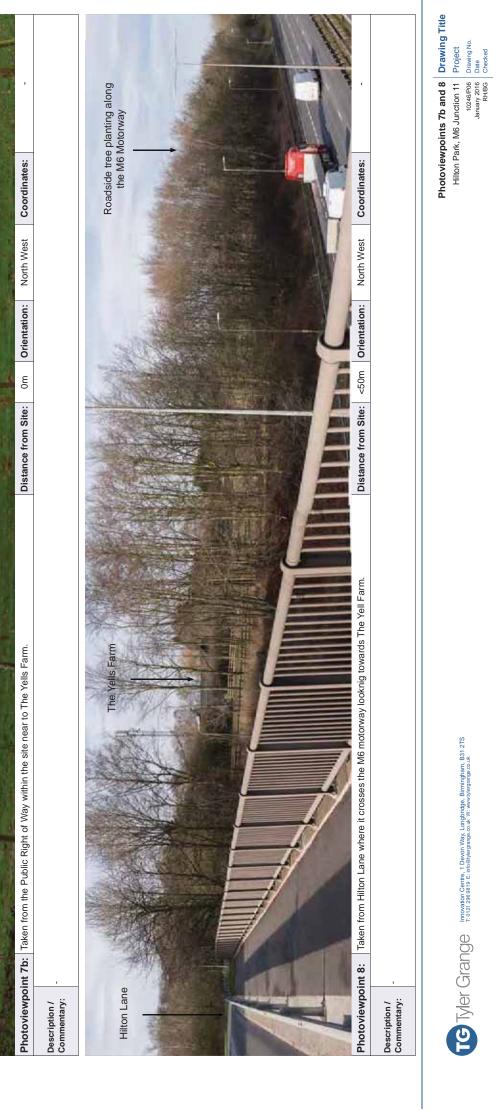
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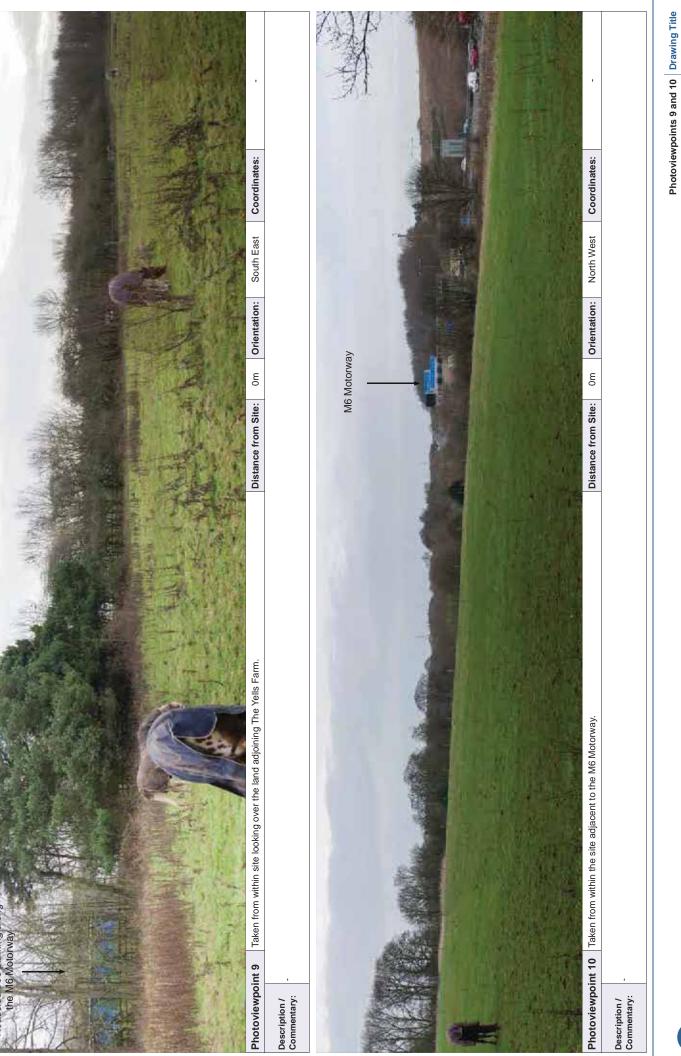
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Drawing No. Date Checked

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