

## Land at Wall Heath – Employment Site Assessment Response

Site Selection Criteria	Assessment	Objector's Commentary
<p>Site Reference</p> <p>Address</p> <p>Site Size (ha)</p> <p>Proposed Use</p>	<p>E56</p> <p>Land at Wall Heath</p> <p>80.66</p> <p>E(g) – Office or Light Industrial</p> <p>B2 – General Industrial</p> <p>B8 – Storage or Distribution</p>	<p>The objector has reviewed the original masterplan prepared to accompany the Regulation 18 submission. A new masterplan is attached to the site specific objection indicating that offices will be replaced with light industrial units. This does affect traffic generation, in a positive manner whilst still ensuring that floorspace is provided to meet local market needs.</p>
<p>SA Findings</p>	<p>Major positive effects are predicted against the economy criteria due to the site delivering employment floorspace. Major negative effects are predicted against the landscape criteria, due to the site's Green Belt harm.</p> <p>The full assessment of all minor and major positive and negative sustainability effects arising from the site is available in the Sustainability Appraisal of the South Staffordshire Local Plan Review.</p>	<p>The Objector notes and welcomes the comments regarding the "major positive effects" in respect of economic criteria. However it is disputed that there is major negative impacts in terms of Green Belt given, first, site specific Green Belt issues which are addressed in a separate representation on Green Belt matters. It is also noted that landscape criteria are considered to have a major negative effect but this is not consistent with the assessment under "landscape sensitivity" where the findings of the Council are that landscape sensitivity is "low – moderate". Annex A to this note explains landscape is, indeed, not a significant issue.</p>
<p>Economic Land Availability Assessment Score</p>	<p>53</p>	<p>The Objector observes that the site can be brought forward to deliver development in the early part of the plan period and is not dependent upon the delivery of major infrastructure.</p>
<p>Policy Area and Access to Infrastructure</p>	<p>The site is located immediately north of Wall Heath (Dudley Urban Area) within Himley Parish. Approximately 1.4km north west of the site lies Heathmill Road Industrial Estate Strategic Employment Site although there is a designated employment area located within Dudley Borough approximately 750m south east of the site.</p>	<p>The Objector does not dispute the description of the site and its location. It is pertinent to note that the site is extremely well related to the edge of Dudley Borough and the designed employment areas within it. The market assessment produced by Messrs Harris Lamb/Sellers explains that there is very little availability of many of the Black</p>

	<ul style="list-style-type: none"> <li>• The nearest bus stop which hosts a regular bus service is located adjacent the eastern boundary of the site along A449 Wolverhampton Road.</li> <li>• The eastern boundary of the site is located adjacent A449 Wolverhampton Road, whilst J2, M5 is located over 10km south east of the site.</li> </ul>	Country estates in the local area with almost 100% occupancy. This provides a strong case for the release of further land for employment purposes. However this cannot be accommodated in the Black Country itself owing to the absence of further land for employment development. The ability to contribute to the provision of additional floorspace to provide for local business needs forms part of the exceptional circumstances case advanced by the Objector.
Sequential Test	The site is in the Green Belt and therefore is not a sequentially preferable location.	It is not disputed that the site is in the Green Belt but since the greater part of South Staffordshire and most of the other Shire authorities around the Black Country conurbation are Green Belt, any overspill required to meet the Black Country needs, or indeed the needs of South Staffordshire itself, will take place in Green Belt locations. Therefore the reference to sequential test has no practical meaning and should not be taken as a reason not to allocate the site.
Green Belt Harm	Very High	The Objector disputes that there is “very high” impact on the Green Belt. When an objective assessment of Green Belt harm is undertaken, the harm is, in fact, limited and will also be further mitigated by design and landscaping. The impact upon Green Belt harm is explained in more detail in a separate representation in respect of Green Belt and is also examined further in the main body of the representations seeking the allocation of the site.
Landscape Sensitivity	Low – Moderate	The Objector confirms that landscape sensitivity is in the low to moderate category. The masterplan which accompanies the site specific representation clearly demonstrates that the development on the site will be contained within identifiable boundaries and when viewed from the A449 and the Bridgnorth Road (B4176) development can be

		<p>contained within a landscape setting. The site is bounded to the south by existing residential development (and will be separated from this by a landscape/amenity buffer area).</p> <p>In this context the impact of the release of the site for employment development would be limited to the site itself and would not have a material impact on the wider landscape setting (see Annex A).</p>
Impact on Historic Environment	<p>HESA scores the site a green for direct potential harm to the historic environment, indicating no concerns identified, on current evidence, although archaeological mitigation measures may be required. The HESA scores the site an amber for indirect potential harm to the historic environment, indicating no significant effects which cannot be mitigated are at present predicted.</p>	<p>The comments are noted and welcomed. Clearly there are no heritage reserves to prevent the allocation of the site.</p>
Known Site Constraints	<ul style="list-style-type: none"> <li>• Development of the site would result in a significant loss of agricultural land.</li> <li>• Access to the site is reliant on bridge cutting across railway walk which is currently lined by mature tree belt.</li> <li>• Potential amenity issues with residential dwellings near to the southern boundary of the site.</li> <li>• A449 Wolverhampton Road provides well-lit pedestrian access to the site.</li> <li>• Flood Zones 2 and 3 located along south western, western and northern boundaries of the site.</li> <li>• Land at Himley Fields, Hinksford Farm Site of Biological Importance is located along northern boundary of the site.</li> <li>• Kingswinford Railway Walk Biodiversity Alert Site and South Staffordshire Railway Walk Green Space/Open Corridor intersect the north east corner of the site.</li> <li>• The site is located entirely within Mineral Safeguarding Area.</li> <li>• Local Nature Reserve located to the north east of the site.</li> </ul> <p><u>LLFA Comments</u></p>	<ul style="list-style-type: none"> <li>• Loss of agricultural land. It is the case that South Staffordshire needs to significant areas of Green Belt land to meet its own needs and the overspill needs of the Black Country. This would inevitably lead to the loss of agricultural land (since very little brownfield land in the Green Belt is to be released) this should not be taken as a negative impact against the release of the site.</li> <li>• Access to the site can be taken through the rail and will maintain the embankment walkway above so impact upon the mature tree belt will be limited and can be mitigated by additional planting.</li> <li>• Potential amenity issues with residential dwellings. It is noted that the comment relates to “potential impact”. This is clearly a matter which would be resolved at the development management stage but the attached masterplan demonstrates how a suitable landscape/amenity buffer area can be maintained and appropriate mitigation can be</li> </ul>

	<p>Mitigable concerns – Flood Risk Assessment recommended at planning stage to investigate watercourse and surface water ponding.</p> <p><u>County Highways Assessment</u></p> <p>Initial concerns due to impact on surrounding road network.</p>	<p>built into the detailed design of the scheme so this need not be a reason to prevent the allocation of the site.</p> <ul style="list-style-type: none"> <li>• The acknowledgment that the pedestrian access on the A449 is well-lit is welcomed and is clearly not a constraint to the release of the site.</li> <li>• The Flood Zone areas 2 and 3 are not considered to be a constraint to development of the site and development can simply be removed from these areas. This is explained in the attached briefing note by Messrs BWB.</li> <li>• The existence of the site of biological importance has been taken into account in the development of the site and physical development will not take place here. Overall biodiversity net gain can be achieved.</li> <li>• The site is not suitable for mineral development owing to proximity to residential development.</li> <li>• The local nature reserve located to the north east of the site will be protected.</li> <li>• The LLFA concerns confirm that impacts are capable of being mitigated and can be dealt with at the detailed design stage.</li> <li>• County Highways Assessment. This refers to only initial concerns but the briefing note prepared by Messrs BWB confirms that impact to the wider network can be accommodated and need not be an overriding constraint to the release of the site.</li> </ul>
<p>Site Opportunities</p>	<ul style="list-style-type: none"> <li>• Bridleway/byway intersects the site between the residential area located to the south of the site and Himley Village to the north providing cycle access.</li> <li>• Himley 5(b) and Himley 6 Public Rights of Way intersect the site in a north/south direction, Himley 7 PROW runs adjacent to the western boundary of the site.</li> <li>• The site encompasses a large area extending northwards from the existing urban area part of Wall Heath/Dudley</li> </ul>	<ul style="list-style-type: none"> <li>• We agree that cycle access can be provided through the site and can be incorporated in a masterplan.</li> <li>• The public rights of way also provide access opportunities for pedestrians. The development will encompass green infrastructure which will provide amenity and biodiversity benefits.</li> </ul>

	<p>MBC. It is of relatively regular shape although would likely be brought forward as parcels which may impact upon coherent development patterns – compounded by mature tree line intersecting the site from the north through to the east. The site is strongly defined to its east and north east by A449 Wolverhampton Road and B4176 Bridgnorth Road respectively. The southern boundary is defined by the field pattern/hedge/tree rows with agricultural fields beyond.</p> <ul style="list-style-type: none"> <li>• Due to the site being strategic in size, it offers potential for a range of unit types and sizes and is therefore attractive to the market.</li> <li>• Due to the site location in close proximity to Dudley urban area there is a strong employment population catchment, whilst public transport networks operate around the site.</li> </ul>	<ul style="list-style-type: none"> <li>• We agree that the site is very well defined with ecological boundaries. We do not see that the phased development of the site would affect development patterns. The mature tree line intersecting the site from the north through to the east will be maintained as is shown on the attached masterplan.</li> <li>• We agree that the site offers potential for a range of unit sizes to meet employment needs in the wider area. The range of units is illustrated on the masterplan attached to this objection.</li> <li>• We agree that the site is in close proximity to Dudley urban area which has a strong employment population catchment and where many of the existing employment estates are now at full capacity meaning that expansion needs of the area cannot be met without the release of greenfield sites.</li> </ul>
Proposed for Allocation	<p><b>No</b> – The site performs relatively poorly with a number of key constraints including its potential impact on mature tree belt along the railway walk that cuts through the site, and its cumulative effect on the highway network. Major negative effects are also predicted in the Sustainability Appraisal, due to the site being in one of the more harmful Green Belt areas within the district.</p> <p>Furthermore, the supply/demand balance in the EDNA 2022 indicates that South Staffordshire’s local needs can be met and that there is a 36ha surplus of strategic employment land available for cross boundary unmet needs increasing further when factoring in available supply at WMI. Considering the assessment undertaken on this site, and the significant contribution of 103.6ha (including minimum WMI contribution) available for export to the Black Country authorities, this site is not proposed for allocation.</p>	<p>We note that the Council have identified a number of issues which have led to the decision not to allocate the site. We comment upon each of these briefly in turn but it should be noted that these points are expanded upon in the overall objection seeking the allocation of the site.</p> <ul style="list-style-type: none"> <li>• Potential impact on mature tree belt. The impact here will be very limited with this being confined to creating the access point which would be of limited width and replacement planting can be provided. Overall there will be biodiversity net gain in terms of habitat.</li> <li>• Cumulative effect on the highway network. The scheme can be accommodated on the highway network as per the attached briefing note on highways.</li> <li>• In terms of Green Belt harm, it is to be noted that the site is well contained by its existing</li> </ul>

		<p>boundaries (as is identified by the Council's appraisal in the Site Opportunities section above); the following main points should be made.</p> <ul style="list-style-type: none"> <li>• There is no impact upon the coalescence of towns.</li> <li>• There is no impact upon the setting of an historic town or city.</li> <li>• There is no impact upon urban regeneration since it is the case that the neighbouring Black Country authorities require land to be identified to meet their overspill requirements for both housing and employment figures. The release of greenfield sites is needed to meet the overspill requirement.</li> <li>• Although the site is identified as open countryside in policy terms, it is the case that all overspill requirements will need to take place in open countryside locations, as will the development required to meet South Staffordshire's own needs. Therefore the loss of open countryside in the Green Belt cannot be counted as a factor against the site as this is going to be a requirement in order to meet development needs through the plan period.</li> </ul> <p>Meeting Black Country overspill requirements.</p> <p>It is common ground that South Staffordshire has a strong functional relationship with the Black Country including economic needs. It is therefore reasonable to expect South Staffordshire to accommodate more than a proportion of the overspill needs. In this context the suggested figures for meeting the Black Country needs are not sufficient and further land needs to be released to meet the Black Country's needs. The market assessment paper prepared by Messrs Harris Lamb/Sellers, accompanying this objection, clearly identifies the lack of available floorspace within the</p>
--	--	---

		<p>Black Country and that urgent steps are needed to release land to accommodate known expansion needs of existing companies let alone to accommodate inward investment.</p> <p>Reliance upon the WMI as a source of employment land for local businesses is a misconception. WMI is clearly needed to meet regional/national employment needs for major rail related proposals. Such floorspace, which is likely to be on large footprints, would have little benefit to local companies seeking to grow and establish within the Black Country and environs. Furthermore the development of the WMI requires considerable amounts of infrastructure to take place and the trajectory for provision suggested it could be some years before employment floorspace is online in any event (notwithstanding that this is unlikely to be suitable for meeting the needs of local businesses). The site assessment has already identified under the “site opportunities” section at bullet point 4, that the site offers potential for a range of unit types and sizes which would be attractive to the market. We agree entirely with this suggestion and it is for this very reason that the site has been brought forward as a proposed allocation to meet the market needs from the Black Country.</p> <p>In this context there are no significant impacts which would be caused by the release of the site for development but there would be strong economic benefits as is already accepted in the site appraisal produced for this site.</p>
--	--	---