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**Date:** 13 December 2021



Strategic Planning Team  
South Staffordshire Council  
Council Offices  
Wolverhampton Road  
South Staffordshire  
WV8 1PX

By email: localplanreview@sstaffs.gov.uk

Dear Sir / Madam,

## **Local Plan Review Local Plan Preferred Options (November 2021) Representations by Bericote Properties Limited**

We are instructed by our client, Bericote Properties Limited (“Bericote”), to submit representations to the South Staffordshire District Council (“SSDC”) consultation on the Local Plan Preferred Options (November 2021). Comments have been invited up to 17:00 on 13<sup>th</sup> December 2021 and on the basis that this letter is submitted within this timescale we trust that they will be taken into account.

These representations principally relate to the expansion land at Four Ashes, which is one of the four strategic employment sites allocated by SSDC under Policy EV1 (Retention of Existing Employment Sites) of the adopted South Staffordshire District Council Core Strategy (December 2012) which has been protected for industrial or commercial purposes (Use Class B1, B2 and B8).

We have previously submitted representations in response to SSDC’s Call for Sites in October 2018 and the Spatial Housing and Infrastructure Delivery Plan and Green Belt Study in December 2019.

### **1 The Expansion Land**

The Expansion Land comprises two parcels of land adjoining the eastern and southern boundaries of the Bericote Four Ashes site (approximately 8.88 hectares). Bericote Properties Limited are the sole owner of this land. A Site Location Plan, prepared by UMC Architects, (ref. 13029 P0001 Rev B) is appended at **Document 1**.

Following significant investment in the Bericote Four Ashes site, Gestamp relocated its manufacturing headquarters to the site. Gestamp supply automotive components to Jaguar Land Rover and this relocation represents a £110 million investment into the area. This has also acted as a catalyst for the area, with other occupiers coming forward. Global logistics provider, Panattoni speculatively developed a 500,000 square foot distribution unit and Bericote invested in developing out the final plot. The 37,000 square foot new production/warehouse unit was let on practical completion to



Haulotte UK Ltd, a company formerly based in Telford who have relocated to Four Ashes and are trading successfully.

The expansion land at Four Ashes could deliver a range of unit sizes to reflect market needs in the area, and approximately 42,000 square meters of employment floorspace. An Illustrative Masterplan, prepared by UMC Architects, (ref. 13029 P0002 Rev A) is appended at **Document 2**. This Masterplan shows how the Expansion Land could be developed across four units which range in size from circa 8,300 square metres to circa 14,000 square metres.

The Expansion Land is currently vacant and comprises greenfield land within the Green Belt. In December 2021, Bericote commissioned a Green Belt Review of the contribution that this land makes to the Green Belt, within its emerging context. The Review was carried out by Bryant Landscape Planning, using the same approach that SSDC used when carrying out the Council's 2018 Review of the Green Belt. This review found that when applying the assessment criteria and methodology employed in the SSDC Green Belt Review, both sites currently make a limited contribution to Green Belt Purposes as defined in the NPPF. This Green Belt Review is appended at **Document 3**.

There remains a strong need for warehousing in this location, which will not be met by the West Midlands Interchange DCO (WMI). The WMI land will accommodate strategic units of 250,000 square foot plus to meet a national need, whilst the Expansion Land would accommodate units of 90,000 to 150,000 square foot. The Expansion Land therefore meets a completely different need for different types of occupier and would not compete with the WMI land.

There are no physical constraints on either site, aside from existing trees. However, these trees are aging, do not benefit from any statutory protection and can therefore be removed without any form of planning constraint. In addition, trees covered most of the eastern boundary of the Bericote Four Ashes site prior to development and this did not pose a barrier to redevelopment. Due to the existing Bericote Four Ashes site, the Expansion Land benefits from existing utilities, including mains water supply, mains sewerage, electrical supply, and gas supply. The whole site is also well connected, with significant highways infrastructure having been delivered as part of the Bericote Four Ashes development.

The Expansion Land represents an excellent opportunity to provide additional employment land adjacent to an existing employment development. The land is available immediately and should be accepted by the Council as a suitable location for additional industrial and commercial land, removed from the Green Belt, and included as part of the Four Ashes Strategic Employment site.

## 2 Four Ashes Site Allocation

Four Ashes has been allocated by the Council under Policy EV1 (Retention of Existing Employment Sites) of the adopted South Staffordshire District Council Core Strategy (December 2012). The Policy sets out that sites which are used and / or allocated for industrial or commercial purposes (Use Class B1, B2 and B8) will be safeguarded for that use. The Policy specifically provides protection for the employment use at Four Ashes, stating:



*'The strategic employment sites at i54, Hilton Cross, ROF Featherstone / Brinsford and Four Ashes shall be used for employment purposes that accord with their substantive planning permission and their strategic planning and economic justifications.'*

The Policy states that Four Ashes has been a strategically important industrial location within South Staffordshire for a number of years. The Core Strategy also supports modest extensions to the four existing freestanding strategic employment sites, stating that modest extensions will be considered to accommodate justified development needs. The Bericote land at Four Ashes is also specifically listed as a main employment area in Table 9 of the Local Plan Preferred Options.

### 3 Relationship with West Midlands Interchange

The Local Plan Preferred Options sets out preferred sites for development in the District and proposes how future development will be distributed across the District and on which sites. It sets out the proposed site allocations to meet the preferred strategy and we are seeking views on these, including what additional infrastructure sites may require, or be able to realise

In 2020 the West Midlands Interchange (WMI) was granted consent through the Development Consent Order (DCO) process. The Preferred Options document sets out that given the DCO and the unmet needs within the wider FEMA, exceptional circumstances for the release of this site from the Green Belt exist. There is no doubt that allocating WMI helps strengthen the portfolio of employment land in the District over the plan period, meeting a need for larger warehouses of 250,000 square foot plus for strategic warehousing. The WMI land surrounds the existing Bericote site and expansion land. A copy of the WMI allocation is presented at **Document 4**. This map clearly shows that the Bericote land is surrounded by WMI and the Expansion Land remains the final two parcels of Green Belt land in the middle of what will be an industrial estate.

The Expansion Land does not contribute to any of the Green Belt Purposes and can provide approximately 8.88 hectares of additional employment land in units of approximately 90,000 square foot to 150,000 square foot to help meet the employment needs of the wider FEMA. These two parcels of land should be released from the Green Belt along with the WMI Land under the same exceptional circumstances that clearly exist across WMI and the Expansion Land. The Bericote Four Ashes site is already an established employment development and the units that would be provided would be significantly smaller than the strategic units proposed at the WMI. Releasing the Expansion Land from the Green Belt aligns with the objectives of the Local Plan Preferred Options to create more skilled jobs within the District.

The A449 provides excellent levels of connectivity to services and employment and provides accessibility for the areas north of the Black Country. National policy provides strong support for LPA's to make more suitable and connected land available for logistics development, recognising the importance of the logistics industry to the UK economy and seeking to ensure that suitable land is allocated for this use. At Paragraph 031 Ref ID 2a-031-20190722, the PPG states:



*“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).*

*Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:*

- *engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;*
- *analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;*
- *analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and*
- *engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.”*

Strategic policy-making authorities are asked to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones). The Expansion Land is immediately available is relatively unconstrained and well-connected, with significant highways infrastructure having been put in place to allow for the delivery of the Bericote Four Ashes development. The expansion land provides opportunities for the extension of a successful employment development which will support a new settlement in this area and provide necessary employment opportunities.

We appreciate that the latest Strategic Housing and Economic Land Availability Assessment (October 2018) concluded that there is a sufficient amount of employment land within the District. However, this has not taken into account the unmet need from the wider FEMA. SSDC will need to accommodate any unmet need from the other Authorities within the Black Country area, namely Wolverhampton, Walsall, and Dudley, which SSDC will need to consider as it has done with the unmet need arising from the Greater Birmingham Housing Market Area. The employment land supply relies heavily on the West Midlands Interchange coming forward as one of the main strategic sites for the region. The



expansion land at Four Ashes would support this key strategic site and should be considered as a valuable addition to the employment land supply in the District.

#### 4 Employment Land Need

The Four Ashes site is located off the Stafford Road (A449) and is approximately 2.5 miles from Junction 12 of the M6. This is an established industrial area with a population of circa 3 million people within a radius of 20 miles. Immediate occupiers within close proximity to the site are HOPPE UK, Haulotte UK, Gestamp West Midlands, SI Group, Air Liquide Healthcare and other local occupiers in the area are Jaguar Land Rover Engine Manufacturing Centre, Mann + Hummel, Task Consumer Products Ltd, Plastic Bottle Supplies Limited, Total Construction Supplies Ltd.

Four Ashes is close to Wolverhampton which provides a large labour market as well as the greater Black Country and West Midlands conurbation. This is an important factor in site selection for occupiers but there is currently a very limited pipeline or existing stock in this location. In recent years there has been a substantial amount of take up of new/modern industrial/warehouse space in the size band between approximately 100,000 square foot – 200,000 square foot. There are a number of reasons why this size band is particularly popular, such as:

- A number of well established local companies are going through an expansion phase and need more space ideally within close proximity to their current base to help with staff and customer retention;
- Companies are driving for improved efficiencies and will look to relocate from older style premises and take new accommodation;
- This size band is particularly popular for urban logistics providers such as Amazon, and new entries such as Super Smart Services who are seeing substantial business growth as online sales increase;
- Some organisations would rather grow organically and have a number of facilities perhaps close to each other rather than one very large facility which has higher risk attached to it and capital outlay. An example of this is Dreams who have expanded and taken up more space in Oldbury;
- Buildings of a certain age will have lease events which may trigger occupiers to consider moving to a new premises;
- Some companies have not been able to identify new accommodation in their ideal search area and have had to increase their search radius to locations which are not necessarily their preferred location. Beeswift for example were based in Oldbury and have had to relocate to Birmingham due to lack of supply in the area. Likewise Super Smart Services cannot find a suitable space in Cannock and are now looking outside of their preferred area.

It is very important for SSDC officers to understand that the West Midlands Interchange DCO meets a national need with units of 250,000 square foot plus, and the Four Ashes Expansion Land therefore



meets a completely different need. The sites do not compete, with each meeting a need within different parts of the sector.

## 5 SSSC Green Belt Study (July 2019)

The SSSC Green Belt Study (July 2019) assesses the Green Belt for the Black Country (Wolverhampton, Dudley, Sandwell, and Walsall) and South Staffordshire. The Study forms part of the evidence for the South Staffordshire Local Plan, and Four Ashes and the Expansion Land has been assessed as part of the study. Land at Four Ashes, including the Expansion Land, was assessed as part of a wider parcel of land, between Wolverhampton and Stafford, under Parcel Reference S32 (approx. 7308.4 hectares). The assessment for the site concludes that the site is 'weak / no contribution' with regards to:

- *'Checking the unrestricted sprawl of large built-up areas: Land is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built up area;*
- *Preventing the merging of neighbouring towns: Land plays no significant role due to the distance between the West Midlands conurbation and Stafford, and between Stafford and Cannock; and*
- *Preserve the setting and special character of historic towns: Land does not contribute to the setting or special character of a historic town.'*

The Parcel is considered to be 'strong' with regards to:

- *Safeguarding the countryside from encroachment: Land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside; and*
- *Assist urban regeneration, by encouraging recycling of derelict and other urban land: All parcels are considered to make an equal contribution to this purpose).'*

The Expansion Land at Four Ashes pose a moderate expansion of the existing Four Ashes site, and only a small part of the parcel of land between Wolverhampton and Stafford which has been assessed as a whole. The findings of for the entirety of Parcel S32 are therefore not wholly accurate for this specific area, which measures approximately 8.88 hectares. The Expansion land is now surrounded on all sides by the Four Ashes Industrial Estate and the future West Midlands Interchange, as shown at Document 4.

Development of the expansion land at Four Ashes would not impact the wider parcels ability to safeguard the countryside from encroachment, as the parcels are directly adjacent to the existing



industrial site. As the expansion land is surrounded by industrial land, its development would not threaten the purpose of the Green Belt between Wolverhampton and Stafford. The release of this land from the Green Belt would therefore allow for necessary employment land to come forward without compromising the Purposes of the Green Belt.

## 6 Expansion Land Green Belt Review 2021 (Bryant Landscape Planning)

Bericote commissioned a Green Belt Review to be carried out in December 2021 using the assessment criteria and methodology employed in the SSDC Green Belt Review, which was carried in 2019, prior to the grant of the WMI DCO. This Review is appended at Document 3.

The 2021 GB Review found that both sites making up the Expansion Land currently provide a limited contribution to Green Belt Purposes as defined in the NPPF. It was also concluded that the Expansion Land will make an even lower contribution to the Purposes when considering the emerging context, following completion of the WMI, when existing built form and built form associated with the WMI will entirely surround the land.

Due to the limited contribution to Green Belt Purposes, particularly following the completion of the WMI, release of the Expansion Land from the Green Belt would not compromise SSC's overall vision of maintaining and enhancing the character and local distinctiveness of the district, including the natural and historic environment and the character of the wider rural landscape.

Development of the Sites could be compatible in terms of siting, design, form, scale and appearance with the character of the surrounding area, particularly following implementation of the WFI, resulting in no greater impact on the purposes of the Green Belt.

## 7 Expansion Land Economic Benefits

A total of 41,805 square metres (GIA) of new warehousing floorspace could be provided across the Expansion Land. This floorspace will generate a number of economic benefits which are set out below. These figures may be subject to change as the scheme evolves but provide an indication of the scale of benefits that can be expected:

- The construction of the proposed development is estimated to require 170 person years-worth of labour, which if constructed over a 9-12 month period would support an average of 170 – 225 full time equivalent (FTE) construction jobs<sup>1</sup>.

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<sup>1</sup> Construction Industry Training Board (CITB), (2020). Labour Forecasting Tool (Accessed online by subscription: [www.labourforecastingtool.com](http://www.labourforecastingtool.com))



- Spending in the construction sector will generate additional value elsewhere in the economy. Based on a construction cost of £20.25 million, there would be a total of £22.34 million generated within the economy as a whole.
- The new floorspace would accommodate approximately 570 – 1,160 FTE jobs once operational, which would have a beneficial impact on the local labour market. The reason for this range is that final occupiers are unknown. The final mix of uses ranges from Class B2 which has a higher employment density (36 sqm GIA per job) compared to Class B8 (77 sqm GEA per job)<sup>2</sup>.
- Local labour, skill and training opportunities would be generated through both the construction and operational phases;
- The end-use employment would generate up to £1.6 million - £3.2 million per year in employee additional spending, a proportion of which will be captured by shops and services in South Staffordshire<sup>3</sup>.
- The employment would also generate approximately £23 million - £85 million per year in Gross Value Added (GVA), which measures the economic value generated in the wider economy by the employment supported by the proposed development<sup>4</sup>.
- As well as direct employment, spending by the businesses on materials and services required to run their operations will increase employment across the supply chain. This will, in turn, support the creation of new jobs at suppliers and those new jobs will in turn mean more wages and more spending by those workers. The proposed development is expected to support an additional 500 – 1,700 jobs through indirect effects<sup>5</sup>. This range is due to both the potential number of jobs that could be accommodated here, but also by the range in the sectors that could be based here. For example, the indirect effects associated with manufacturing businesses tend to be higher than those associated within transportation and storage.
- The commercial space would be expected to generate business rate revenue of approximately £810,000 - £960,000 annually (based on rateable values for similar uses in

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<sup>2</sup> Based on standard employment density guidelines in Homes and Communities Agency, 2015.

<sup>3</sup> This is based on a daily average spend for workers in the local area around their place of employment. Visa Europe, 2014. UK Working Day Spending Report. (Daily spending rate has been adjusted to account for inflation based on Bank of England inflation rate change since 2014).

<sup>4</sup> ONS, 2019. Regional gross value added by industry (London) and ONS, 2019. Business Register and Employment Survey.

<sup>5</sup> ONS, 2019. Type I UK employment multipliers and effects, reference year 2015 – FTE multiplier of 1.89 for warehousing and support activities for transportation and 2.43 for manufacturing (average).





the area), a proportion of which would be retained by South Staffordshire Council to spend on identified priorities<sup>6</sup>.

The proposed development is therefore a significant economic opportunity for South Staffordshire Council and the District's residents.

## 8 Summary

In the context of the existing Four Ashes industrial developments and the West Midlands Interchange, the two sites which form the Expansion Land have become islands of Green Belt surrounded by existing and future built form. The Expansion Land does not contribute to any of the Five Purposes of the Green Belt and should no longer be considered in the context of the wider Green Belt parcel. Exceptional circumstances exist on the basis that that the surrounding context has changed significantly since the WMI DCO and the wider Bericote Four Ashes land was developed. The economic benefits of releasing this land from the Green Belt are significant. The Expansion Land meets a completely different type of need to the WMI land and would therefore not compete with this development.

Demand for Class B2 / B8 floorspace in this location is particularly high given the proximity the M6, M6 Toll, M54 and A5. Releasing the Expansion Land from the Green Belt to allow an extension to the existing industrial development at Four Ashes will help to meet demand in a sustainable location, supporting the critical mass of activity within the area and ensuring sustained economic growth.

We trust that these representations will be taken into account and the retention of the Expansion land in the Green Belt will be reconsidered in future versions of the Local Plan, given the changing context of this location. We are happy to meet with the planning policy team to discuss further and can be contacted at the email address on this letter.

Yours faithfully,

Tim Rainbird  
Board Director

cc. Bericote Properties Limited

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<sup>6</sup> Valuation Office Agency, 2017. Business Rates [online] available at: <https://www.gov.uk/correct-your-business-rates>. Rates before any reliefs.



## Document 1

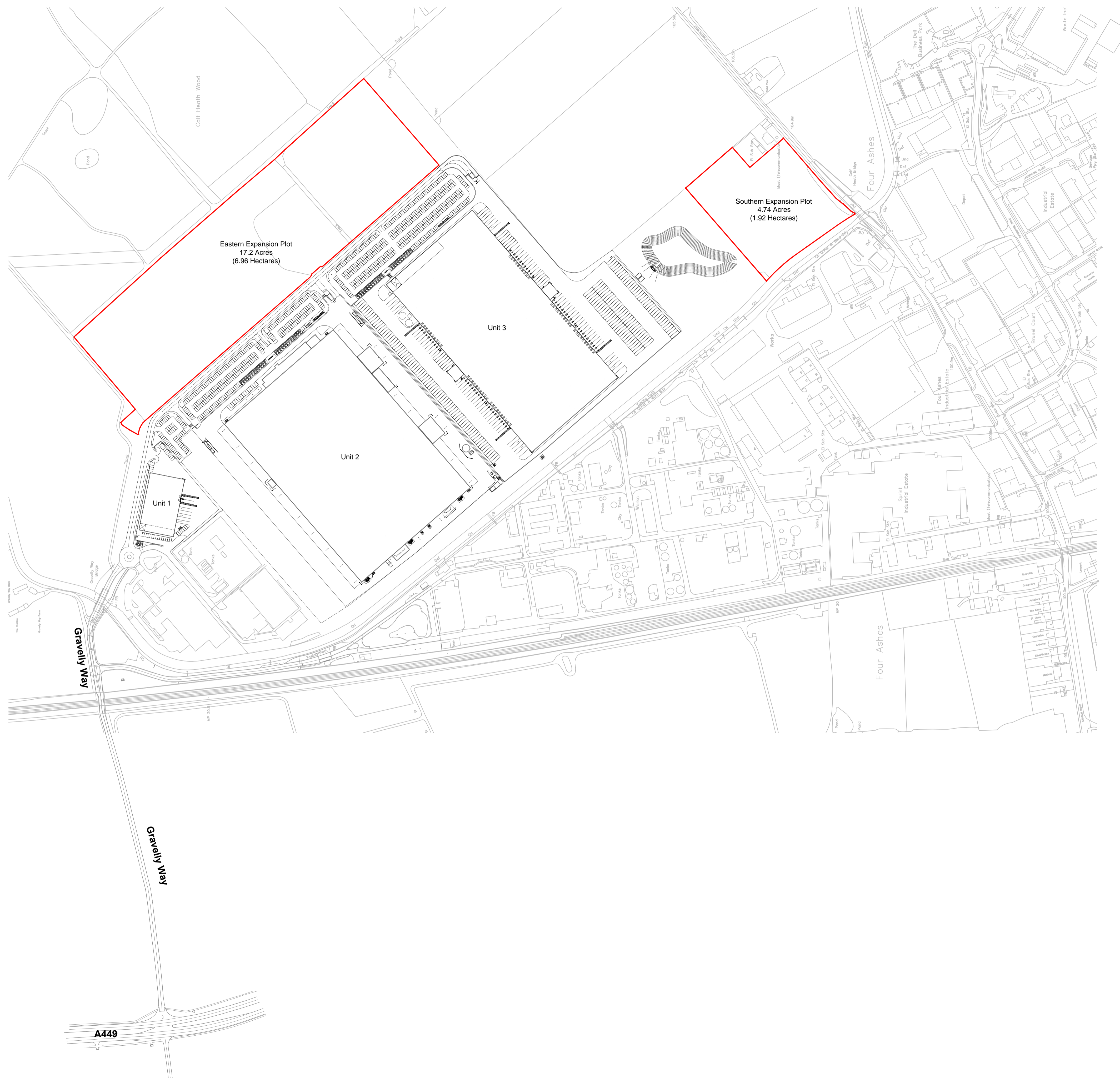
**Site Location Plan (13029\_P0001[B])**

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- Dimensions are in millimeters, unless stated otherwise.  
 - Scaling of this drawing is not recommended.  
 - It is the recipient's responsibility to print this document to the correct scale.  
 - All relevant drawings and specifications should be read in conjunction with this drawing.



Expansion Plot Area  
 Total: 21.94 Acres (8.88 Hectares)



rev | amendments | by | ckd | date

Four Ashes, South Staffordshire  
 Site Location Plan



Newark Beacon Innovation Centre, Cafferata Way, Newark, Nottinghamshire NG24 2TN  
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Drawing Status:	Planning
Drawn / Checked:	SH / DSU
Date:	28.09.2018
Scale:	1:2500 @ A1
Drawing no:	Revision:
13029 P0001	B

50m SCALE 1:2500



## Document 2

**Four Ashes Expansion Land Illustrative Plan (13029\_P0002[A])**

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Dimensions are in millimeters, unless stated otherwise.  
 Scaling of this drawing is not recommended.  
 It is the recipient's responsibility to print this document to the correct scale.  
 All relevant drawings and specifications should be read in conjunction with this drawing.



**SCHEDULE OF ACCOMMODATION**

Unit 4	
Net Warehouse Area	- 85,500 sq ft (7,943m <sup>2</sup> )
Office (First Floor)	- 4,500 sq ft (418m <sup>2</sup> )
<b>Total Area</b>	<b>- 90,000 sq ft (8,361m<sup>2</sup>)</b>
Level Access	- 2
Level Access Doors	- 2
HGV Parking	- 27
Car Parking	- 95
<b>Plot Area</b>	<b>- 4.58 Acres (1.85 Hectares)</b>
Unit 5	
Net Warehouse Area	- 104,500 sq ft (9,708m <sup>2</sup> )
Office (First Floor)	- 5,500 sq ft (511m <sup>2</sup> )
<b>Total Area</b>	<b>- 110,000 sq ft (10,219m<sup>2</sup>)</b>
Level Access	- 9
Level Access Doors	- 2
HGV Parking	- 27
Car Parking	- 115
<b>Plot Area</b>	<b>- 5.22 Acres (2.11 Hectares)</b>
Unit 6	
Net Warehouse Area	- 142,500 sq ft (13,238m <sup>2</sup> )
Office (First Floor)	- 7,500 sq ft (697m <sup>2</sup> )
<b>Total Area</b>	<b>- 150,000 sq ft (13,935m<sup>2</sup>)</b>
Level Access	- 12
Level Access Doors	- 2
HGV Parking	- 50
Car Parking	- 150
<b>Plot Area</b>	<b>- 7.40 Acres (3.00 Hectares)</b>
Unit 7	
Net Warehouse Area	- 92,500 sq ft (8,593m <sup>2</sup> )
Office (First Floor)	- 7,500 sq ft (697m <sup>2</sup> )
<b>Total Area</b>	<b>- 100,000 sq ft (9,290m<sup>2</sup>)</b>
Level Access	- 8
Level Access Doors	- 2
HGV Parking	- 12
Car Parking	- 100
<b>Plot Area</b>	<b>- 4.74 Acres (1.92 Hectares)</b>
<b>Total Areas</b>	<b>- 450,000 sq ft (41,805m<sup>2</sup>)</b>
<b>Total Plot Areas</b>	<b>- 21.94 Acres (8.88 Hectares)</b>



REV amendments by date

Four Ashes, South Staffordshire  
 Four Ashes Expansion - Illustrative Masterplan



Newark Business Innovation Centre, Calverley Way, Newark, Nottinghamshire NG24 2JH  
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Drawing Status: Planning  
 Drawn / Checked: SH / DSU  
 Date: 28.09.2018  
 Scale: 1:1000 AO

Drawing no.: 13029 P0002 Revision: A

10m SCALE 1:1000



## Document 3

**Expansion Land Green Belt Review December 2021**

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# Green Belt Review

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## Four Ashes Expansion, South Staffordshire

December 2021

# Bryant Landscape Planning

Prepared by Bryant Landscape Planning Ltd  
[www.bryantlandscapeplanning.co.uk](http://www.bryantlandscapeplanning.co.uk)

A Registered Practice of the Landscape Institute  
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## **FOUR ASHES EXPANSION**

### **GREEN BELT REVIEW**

#### **CONTENTS**

1. Introduction
2. Green Belt
3. Approach
4. The Sites and their context
5. Contribution to Green Belt Purposes
6. Summary and Conclusions

Appendix A: SSC Green Belt Assessment Criteria

Appendix B: SSC Green Belt Assessment – Four Ashes Parcel 2

Appendix C: Assessment of Site B’s contribution to Green Belt purposes

## 1. INTRODUCTION

- 1.1. This note has been prepared by Bryant Landscape Planning Ltd on behalf of Bericote Ltd to provide advice on the potential extension of the Four Ashes Enterprise Park at Four Ashes, South Staffordshire. Two expansion sites are considered (hereafter referred to as 'Site A' and 'Site B'). The planning authority is South Staffordshire Council (SSC) and both sites are designated as West Midlands Metropolitan Green Belt. Around 80% of the district is designated as Green Belt.
- 1.2. This note:
- reviews Green Belt assessments previously carried out on behalf of SSC;
  - provides an appraisal of the contribution the Site(s) currently make to the purposes of the Green Belt as defined in the NPPF; and
  - provides an appraisal of the contribution the Site(s) would make to the purposes of the Green Belt following completion of the West Midlands Freight Interchange.
- 1.3. A site visit and field study were undertaken in September 2021 to understand the Sites and the surrounding area.

## 2. GREEN BELT

- 2.1. The purposes of the Green Belt are set out in section 13 of the National Planning Policy Framework (NPPF)<sup>1</sup> The essential characteristics of Green Belts are defined as being their permanence and openness and the NPPF states that '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*'. There is no legal definition of the term '*openness*' with regard to Green Belt.
- 2.2. Five purposes which Green Belt should serve are defined in the NPPF:
- *Purpose 1: To check the unrestricted sprawl of large built-up areas;*
  - *Purpose 2: To prevent neighbouring towns merging into one another;*
  - *Purpose 3: To assist in safeguarding the countryside from encroachment;*
  - *Purpose 4: To preserve the setting and special character of historic towns; and*
  - *Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
- 2.3. Green Belt policy maintains the principle that certain forms of built development, however small in scale, are inappropriate and should not be approved except in '*very special circumstances*'.
- 2.4. Green Belt is a spatial planning tool, not a designation which is designed to protect nature and landscape character or the benefits they provide; Green Belt policy does not require Green Belt to

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<sup>1</sup> Department of Housing, Communities and Local Government (2021); *National Planning Policy Framework*

be of high landscape quality or even particularly attractive. It should be noted therefore that a Green Belt review does not provide an assessment of landscape quality.

2.5. The planning system is required to secure environmental, social and economic benefits and there is an overarching presumption in the NPPF in favour of sustainable development. Current Green Belt policy is a ‘spatial separation’<sup>2</sup> designation which does not require the transformation or enrichment of Green Belt land to deliver such benefits.

2.6. *SSC Policy ENV2: Control of Development in the Green Belt* requires that where development is consistent in principle with the purposes of the Green Belt, the Council will require that its siting, design, form, scale and appearance is compatible with the character of the surrounding area, as explained further in *SSC Policy ENV3*.

2.7. *SSC Policy ENV3: Detailed Evaluation of Proposals* within the Green Belt states that where development is acceptable in principle in the Green Belt (under Policy ENV2), proposals will be assessed for their impact on the Green Belt in terms of:

- The detailed layout of the site;
- The siting, design, grouping, height and scale of buildings, structures and associated outdoor equipment;
- The colour and suitability of building materials, having regard for local styles and materials;
- The opportunities to use redundant land and buildings for suitable alternative uses;
- The quality of new landscape schemes;
- The impact on significant views, viewpoints and topographical features;
- The cumulative physical effect of proposals in any one area;
- The implications for local facilities, particularly public services and infrastructure; and
- Any other relevant considerations identified in Policy GP2.

2.8. *SSC Policy ENV4: Major Developed Sites in the Green Belt* states that the limited infilling of major developed sites in the Green Belt may be permitted provided that there will be no greater impact on the purposes of the Green Belt than the existing development; the height of the existing buildings is not exceeded; and there will be no greater impact (and where possible, less impact) than the existing development on the openness and purposes of the Green Belt. The policy seeks to enable appropriate infilling or redevelopment of major developed sites whilst ensuring that the functions and amenity of the Green Belt are not prejudiced. Whilst the Sites are not part of one of the major developed sites referenced in *SSC policy ENV4*, they are located adjacent to the approved West Midlands Rail Freight Interchange (WMI).

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<sup>2</sup> Landscape Institute (2018); *Green Belt Policy*

### 3. APPROACH

- 3.1. In 2014, as part of the evidence base which underpins the Local Plan, SSC commissioned a partial Green Belt Review<sup>3</sup>. It was updated in 2016. The Green Belt Review assessed the contribution to the five Green Belt purposes made by parcels of land adjoining villages and employment sites.
- 3.2. Since there is no universally accepted methodology for carrying out Green Belt reviews, and to ensure consistency, the SSC methodology has been used in this appraisal, and is provided at **Appendix A**. It is important to note that the methodology does not take account of landscape quality or the sensitivity of the Sites to accommodate development since these issues are not relevant to a Green Belt review.

### 4. THE SITES AND THEIR CONTEXT

- 4.1. Both sites are pockets of land to the south and east respectively of the recent extension of the Four Ashes Enterprise Park (Figure 1; Photo 1). The Staffordshire and Worcestershire Canal, which is a conservation area, passes to the west of Site A (Photo 2). Neither site is covered by any designation which denotes landscape value.
- 4.2. The approved WMI abuts both sites to the north, east and south (Figure 2).



*Photo 1: View looking north towards Four Ashes Enterprise Park*



*Photo 2: Staffordshire and Worcestershire Canal to the west of Site A*

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<sup>3</sup> South Staffordshire District Council (2014); *South Staffordshire Partial Green Belt Review*



Figure 1: Site location

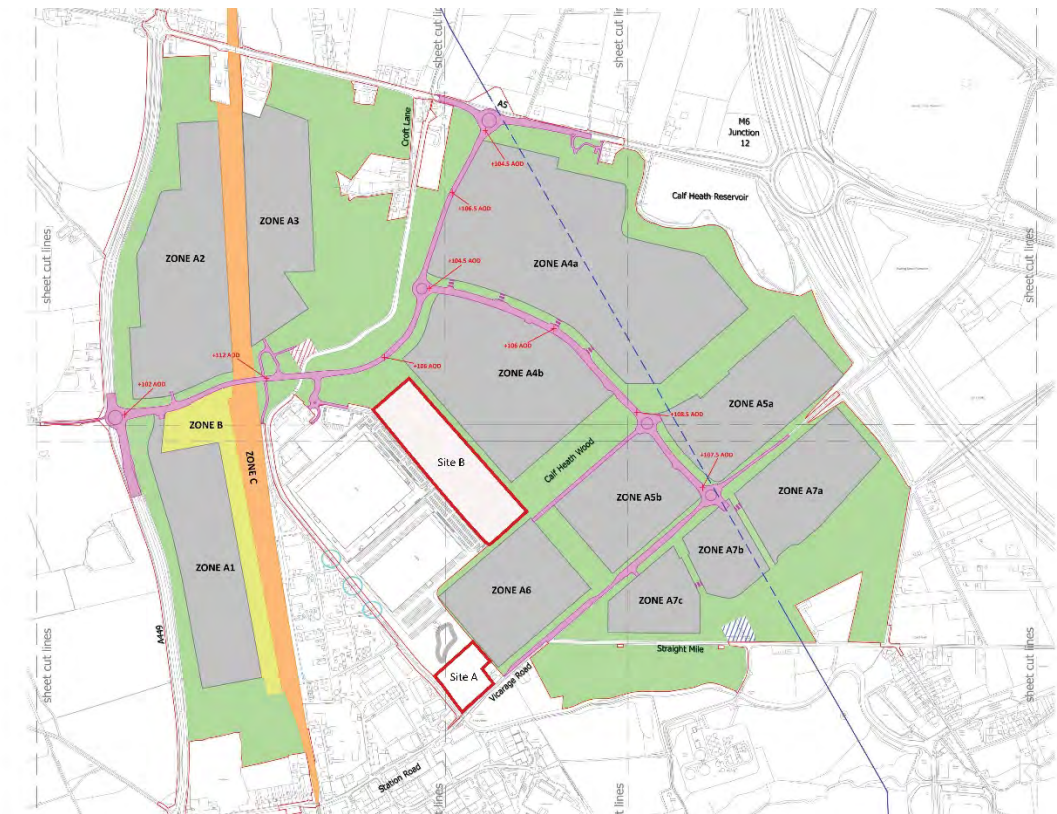


Figure 2: West Midlands Rail Freight Interchange (Parameter Plan)

### Site A

- 4.3. Site A comprises a 1.92 hectare (ha) rectangular parcel of land. It does not contain any built form and there is no public access.
- 4.4. It is bordered to the west by the canal, to the north by an area of open land which contains a pond, to the east by a field and to the south by Vicarage Road. To the north, beyond the drainage pond, is a recently completed distribution centre within the Four Ashes Enterprise Park (Photo 1).
- 4.5. The Site is overgrown, colonised by ruderal scrub. The boundary with Vicarage Road is a native hedgerow and there are mature trees on the western boundary associated with the canal.
- 4.6. Land use in the immediate context of Site A is predominantly light industrial and commercial, with arable fields to the east.

### Site B

- 4.7. Site B is located to the north-east of Site A, abutting the recent Four Ashes expansion. It is rectangular, measuring 6.96ha in area. It is bounded to the east by the Four Ashes Enterprise Park, to the north by arable farmland, to the east by Calf Heath Wood and to the south by farmland.
- 4.8. Site B is woodland. There is no public access.

4.9. Similar to Site A, land use in the immediate context of Site B is light industrial and commercial, with arable farmland to the north and south and woodland to the east.

## 5. CONTRIBUTION TO GREEN BELT PURPOSES

5.1. It is appropriate to consider both the current contribution each Site makes to the purposes of the Green Belt and the contribution they will make when the WMI is complete.

5.2. The methodology applied in the SSC Green Belt Study assessed whether each parcel of land:

- makes a considerable contribution to Green Belt Purposes;
- makes a contribution to Green Belt Purposes; or
- makes a more limited contribution to Green Belt Purposes.

5.3. The SSC Green Belt Study, in making the overall judgement, took account of the individual value scores against each purpose. If one of the parcels scored highly, i.e. 3, for a single purpose, it was automatically assessed as making a considerable contribution to Green Belt purposes.

5.4. The SSC Green Belt Review assessed four parcels of land at Four Ashes (Figure 3). Four Ashes East (Parcel 2) included Site A.

5.5. Site B was not assessed in the SSC Green Belt Review.

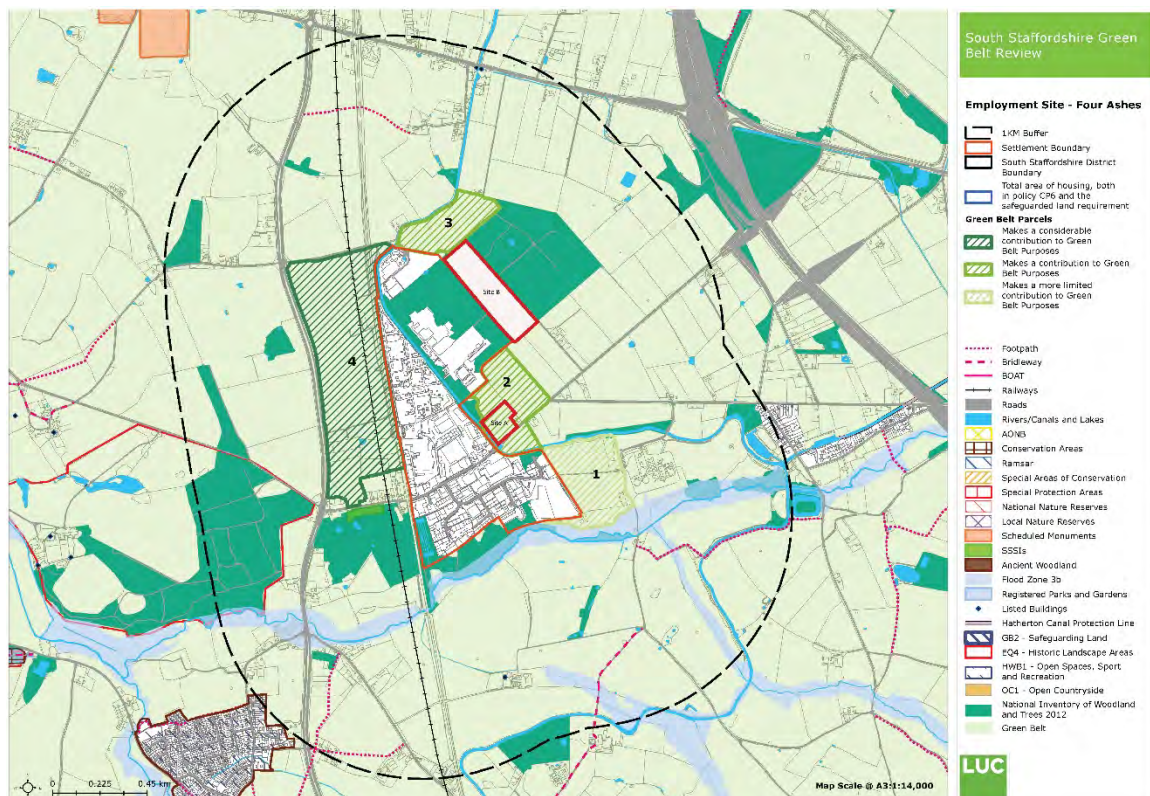


Figure 3: SSC Green Belt Review – Employment Site Four Ashes

## Site A

- 5.6. Four Ashes Parcel 2, of which Site A represents approximately a fifth, was assessed in the SSC Review as making a contribution to Green Belt purposes, with a value of 12 (**Appendix B**).
- 5.7. Applying the SSC methodology specifically to Site A, it is considered that the value for Purpose 3 (To assist in safeguarding the countryside from encroachment) is lower than for parcel 2 in its entirety since there has been additional encroachment of built development to the north of the parcel. Site A's overall value is therefore lowered and it is concluded that it currently makes a **more limited contribution** to Green Belt Purposes.
- 5.8. When the WMI is complete to the east of Site A (Zone A6 on the WMI parameter plan), the value for Purpose 1 (To check the unrestricted sprawl of large built-up areas) will also reduce since Site A will no longer play a role in preventing ribbon development. Site A will therefore make an even more limited contribution to Green Belt Purposes.

## Site B

- 5.9. Applying the criteria defined in the SSC Green Belt Assessment (**Appendix A**) to Site B, it is considered that it currently makes a **limited contribution** to Green Belt Purposes, scoring 11.
- 5.10. Since Site B was not assessed in the SSC Review, detail of the assessment of values is provided at **Appendix C**.
- 5.11. When the WMI is complete to the east of Site B (Zone A4B on the WMI parameter plan), the value for Purpose 3 (To assist in safeguarding the countryside from encroachment) will reduce since there will be development to the west and east of Site B. Site B will therefore make an even more limited contribution to Green Belt Purposes.

## 6. SUMMARY AND CONCLUSIONS

- 6.1. Notwithstanding their Green Belt designation, neither site is subject to wider landscape constraints such as a designation which would denote landscape value, Ancient Woodland, heritage assets etc.
- 6.2. Applying the assessment criteria and methodology employed in the SSC Green Belt Review, it is considered that both sites currently make a limited contribution to Green Belt Purposes as defined in the NPPF.



- 6.3. It is considered that they will make an even lower contribution to the Purposes following completion of the WMI, when existing built form and built form associated with the WMI will surround them.
- 6.4. Due to their limited contribution to Green Belt Purposes, particularly following the completion of the WMI, release of the Sites from Green Belt would not compromise SSC's overall vision of maintaining and enhancing the character and local distinctiveness of the district, including the natural and historic environment and the character of the wider rural landscape.
- 6.5. Development of the Sites could be compatible in terms of siting, design, form, scale and appearance with the character of the surrounding area, particularly following implementation of the WFI, resulting in no greater impact on the purposes of the Green Belt.

## **APPENDIX A – SSC Green Belt Assessment Criteria**

## Appendix 1 - Review Criteria

NPPF Green Belt Purposes	Issues for consideration	Criteria	Value
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, +
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 500m and 2km from boundary, ++ If more than 2km, +
	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/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, +

NPPF Green Belt Purposes	Issues for consideration	Criteria	Value
To assist in safeguarding the countryside from encroachment.	Significance of existing urbanising influences. <sup>12</sup> 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, +
	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, +

<sup>12</sup> 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.

The following definitions were used alongside the assessment criteria to assess the Sites against the purposes of Green Belts:

- Ribbon development – linear development along route ways, such roads, canals and railways.
- Settlement – a village or strategic employment site as defined in Core Policy 1 of the South Staffordshire Local Plan.
- Sprawl - the irregular or straggling expansion of an urban or industrial area, spreading out over a large area in an untidy and irregular way.
- Separation – open countryside between two detached settlements.
- Merging – the joining or blurring of boundaries between two settlements.
- Encroachment from urbanising influences – intrusion, gradual advance of buildings and urbanised land beyond an acceptable or established limit.

Features of historic significance – Conservation Areas, Registered Parks and Gardens, Listed Buildings and Historic Landscape Areas.

**APPENDIX B – SCC Green Belt Assessment - Four Ashes Parcel 2**

Overall Parcel Judgement				
<b>Makes a contribution to Green Belt Purposes</b>				
General Commentary				
Enclosed to the north, south and west but open towards village of Calf Heath				
NPPF Green Belt Purposes	Issues for consideration	Criteria	Value <sup>1</sup>	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
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 500m and 2km from boundary, ++ If more than 2km, +	++ Village of Calf Heath <1km to east
	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/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, +	+ Minor roads, canal and sewage works in between ES and village

<sup>1</sup> Definitions in method statement

Overall Parcel Judgement				
To assist in safeguarding the countryside from encroachment.	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
	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, +	+



## **APPENDIX C – Appraisal of Site B’s contribution to Green Belt purposes**

Site B – Contribution to Green Belt purposes (post completion of WMI in brackets)				
NPPF Green Belt Purpose	Issues for consideration	Criteria	Value	Assessment and Comments
<i>To check the unrestricted sprawl of large built-up areas</i>	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, +	+ Already development on west side of Gravelly Way
<i>To prevent neighbouring towns merging into one another</i>	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 500m and 2km from boundary, ++ If more than 2km, +	++ 1km from village of Calf Heath
	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/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, +	+ road
<i>To assist in safeguarding the countryside from encroachment</i>	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 west (+)
	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, +	+ road
	Countryside access / recreation.	Is there evidence of positive use of the countryside in this location (e.g. footpaths, bridleways, formal or	If yes and abutting the settlement, ++ If yes but not abutting the settlement, or no +	+

		informal sport and recreation)? (Accessible countryside on the doorstep.)		
<i>To preserve the setting and special character of historic towns</i>	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
<i>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i>	The need to incentivise development within settlements	Does the immediate area contain significant areas of brownfield land?	If yes, ++ If no, +	+



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## Document 4

### Local Plan Preferred Options West Midlands Interchange Allocation

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## Appendix E

### Employment allocation maps and proformas

Site reference	E33	Address	West Midlands Interchange
Location	Gailey		
Site size	297ha (232.5ha of land removed from Green Belt)	Proposed use	B8 Employment
<p>Please note: You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.</p>			
Site infrastructure and access requirements	The sites infrastructure and access requirements are set out in the <a href="#">Development Consent Order</a> (DCO) for the site.		