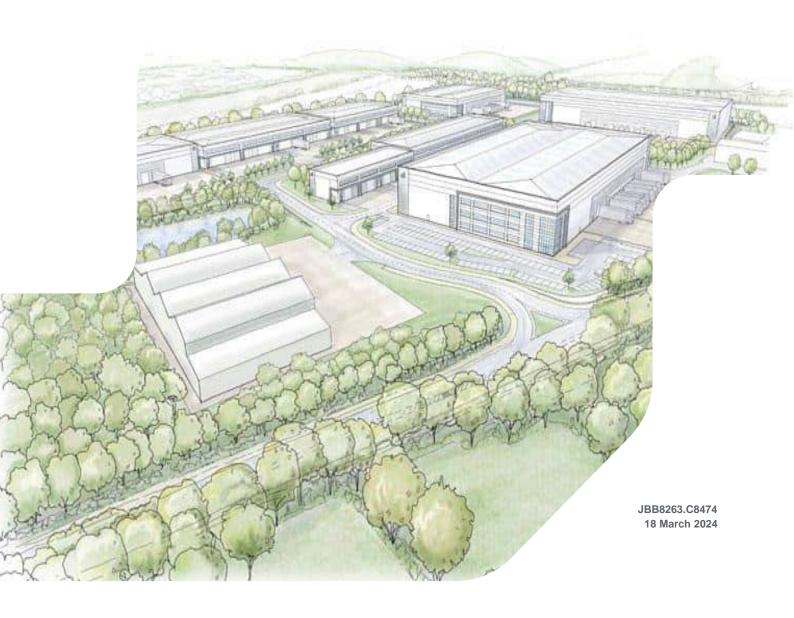


EMPLOYMENT LAND SUPPLY ASSESSMENT

Cannock Chase District



Document status							
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date		
V1	Client review	CE	JB	JB	14/03/2024		
V2	Submission	JB	JB	JB	18/03/2024		

Approval for issue							
Jacob Bonehill		14 March 2024					

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by R P S Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by: Prepared for:

RPS St Modwen Logistics

Contents

EXE	CUTIVE SUMMARY	1
1	INTRODUCTION	3
2	POLICY CONTEXT & EMPLOYMENT REQUIREMENTS	5
3	EMPLOYMENT SUPPLY IN CANNOCK CHASE DISTRICT FOR NEW PLAN PERIOD 2018- 2040	11
	Conclusions on Employment Land Supply	
4	WATLING STREET BUSINESS PARK Existing Watling Street Business Park Proposed Expansion of Watling Street Business Park	21
5	CONCLUSION	22
Tab	oles	
	e 3.1: Summary of Council's Assessment of Employment Land Supply based on ETPe 3.2: Summary of RPS Assessment of Employment Land Supply vs Council Assessment based	12
on 20	023 ELAA	20
App	pendices	
Appe	endix A : Regulation 19 Allocated Sites Mapped	23

EXECUTIVE SUMMARY

This report reviews the emerging Cannock Chase Local Plan 2018-2040's proposed employment land supply. RPS find that despite existing and proposed allocations, the district has an employment land supply of 72.241ha, a shortfall of 1.759 ha against the Council's suggested proposed requirement of 74 ha.

In addition, RPS note that 11.36 ha of land identified as part of the employment land supply is considered to be 'not readily available'. Given that this is a small proportion of the overall land supply RPS consider that there is ample time for the Council to take any actions necessary to assist with sites becoming readily available and/or if necessary, undertake a review of the Cannock Chase Local Plan 2018-2040 if required to identify new sources of supply.

This assessment also identifies concerns with the age of some of the evidence base that the Council is currently relying upon. In particular the Council rely upon the Existing Employment Areas Study prepared in October 2019. As this is over 2 years old it is at risk of being considered out of date as set out in the Procedure Guide for Local Plan Examinations. Given the impacts of the Covid-19 Pandemic and Brexit RPS are concerned that this is the case with the most recent version of the Existing Employment Areas Study and recommend that this should be updated.

This report supports the employment site allocation (Ref. SE2) 'Watling Street Business Park Extension' as an effective solution to addressing the identified employment land supply gap, in addition to the intensification of the existing Watling Street Business Park site.

The employment site allocation SE2, offers several advantages:

- Directly contributes to closing the land supply gap, potentially alleviating a significant portion of the existing and future employment land needs.
- Offers flexibility and diversification for businesses by providing a range of unit sizes and types.

Therefore, prioritising the expansion and intensification of the Watling Street Business Park through the Local Plan is essential for securing sufficient and diverse employment land provision in Cannock Chase District. This action will be crucial for fulfilling the district's economic growth ambitions and supporting a dynamic business environment.

The full report provides a detailed analysis of the land supply assessment, including specific reasons for the under-provision and a comprehensive breakdown of the Watling Street Business Park potential which is proposed for allocation in the Regulation 19 submission version of the Cannock Chase Local Plan.

1 INTRODUCTION

1.1 RPS has been instructed by St Modwen Logistics ('St Modwen') to produce an Employment Land Supply Review for their land and development interests at Watling Street Business Park, Watling Street, Cannock.

Purpose of the document

1.2 This document assesses the Local Plan's approach to meeting the district's employment needs and provides an assessment of available employment supply, based on the Employment Land Available Assessment ('ELAA'), which is the evidence base and monitoring document. The ELAA assists in identifying sites which could have the potential for employment development and estimates their potential capacity in terms of uses and floor space. The ELAA also considers those sites which are allocated through the Local Plan and/or have planning permission for employment use.

St Modwen Logistics

- 1.3 St Modwen Logistics is a specialist industrial and logistics developer with a strong track record in delivering and managing commercial development. St Modwen has significant experience with industrial and logistics property in the Midlands. These include:
 - Hilton Business Park, near Derby
 - Barton Business Park, Centre 38
 - Pirelli Tyre Factory, Burton-upon-Trent
 - Trentham Lakes, Stoke-on-Trent
 - Etruria Valley, Stoke-on-Trent
 - Centurion Park, Tamworth
 - Meaford Business Park
- 1.4 As property managers, St Modwen will regularly lease out units to prospective tenants, as well as acting as development partner for expanding businesses.

Structure of the Report

- Chapter 2 outlines the planning policy context and employment requirements.
- Chapter 3 considers the current plan period supply of employment land within the district based on the ELAA.
- Chapter 4 provides brief details of the proposals for the existing Watling Street Business
 Park and the proposed expansion.
- Chapter 4 concludes the report.

rpsgroup.com

Assumptions

- 1.5 The accuracy of our land supply analysis hinges on several critical assumptions made to navigate potential ambiguities and address data discrepancies.
- 1.6 Firstly, the definition of employment uses for the calculation excludes those found in town centres. Our focus rests on non-town centre uses categorized as E(g) (formerly B1)/B2/B8, such as offices, warehouses, and industrial facilities. This excludes retail, restaurants, and other uses typically associated with town centres. This distinction prioritises analysing employment opportunities directly contributing to economic growth and in the words of the Council's new Local Plan, provide 'sufficient and appropriate land to provide a range of local employment opportunities.'
- 1.7 Secondly, we align with the 2018/19 starting point for employment completions to maintain consistency with the established monitoring period for the strategic housing policies. This is in line with the Council's approach in the Employment Topic Paper ('ETP') (December 2023), adopting a consistent approach across both sectors (housing and employment) facilitates a more accurate and comparable land supply assessment. This ensures a reliable evaluation of progress towards fulfilling both housing and employment development targets within the Plan.
- 1.8 Thirdly, it is acknowledged that the ETP (Dec 2023) sets a target of 74ha Gross to reflect the employment needs over the Plan Period. It is recognised that the figure used is at the top end of the range provided in the latest Employment Development Needs Assessment ('EDNA') (52-74Ha). Reasons for this are set out within.
- Lastly, our assessment of 'intensification sites', i.e., proposals for new units within existing open storage or operational metal working areas requires careful consideration. For the purposes of this assessment RPS has classified these locations as B8 employment uses on the assumption that if redevelopment took place B8 use is likely to be considered appropriate. These sites contribute actively to the land supply if occupied and operational. Therefore, unless a proposed scheme for such a site is deemed undeliverable, we do not automatically deduct it from the available land pool. This approach recognises the ongoing economic contribution of these existing uses while accounting for potential future redevelopment opportunities.
- 1.10 By explicitly outlining these assumptions, we aim to ensure transparency and accountability in our land supply analysis. We acknowledge the inherent uncertainties within the data and policy framework but strive to navigate them through thoughtful and justifiable assumptions that contribute to a robust and reliable assessment.

2 POLICY CONTEXT & EMPLOYMENT REQUIREMENTS

Planning Policy Context

- 2.1 National Planning Practice Guidance (PPG) outlines the purpose of a land availability assessment which is to identify a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period. Assessments for housing and economic land availability may be carried out as part of the same exercise to ensure consistency.
- 2.2 The ELAA is an evidence base and monitoring document with a key role in identifying sites that have the potential for employment development. It uses a variety of sources and assesses sites against a largely nationally set criteria to help inform decisions on the overall supply and likely geographical distribution of employment developments across the district. It also serves to monitor the ongoing take-up of sites and supply of future sites, helping to inform local planning policy and development management responses.
- 2.3 The ELAA supports the Authority Monitoring Report (AMR) process, including monitoring against Local Plan requirements. It covers the period from 1st April 2006-31st March 2023, in line with monitoring completions from the Local Plan (Part 1- 2014) base date of 2006. The Local Plan (Part 1) was adopted in 2014 and Policy CP8 sets out a requirement for a minimum of 88ha of new and redeveloped employment land (primarily for non-town centre B class uses but with flexibility for other uses, where appropriate) up to 2028.
- 2.4 The need for local authorities to support economic growth and specifically meet the needs of business is well established within the National Planning Policy Framework ('NPPF') (September 2023), which advocates (para 81) the provision of sustainable economic growth:
 - "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."
- 2.5 In addition, the NPPF sets out (at para 20) that "strategic policies should set out an overall strategy for the pattern, scale and design quality of places ... and make provision for: ... employment ... and other commercial development".
- 2.6 In paragraph 31, it states that local authorities should use an evidence-based approach to employment requirements and supply which is both up-to-date and based on a clear understanding of business needs in the area:
 - "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

2.7 In summary, the Government is committed to ensuring that sufficient levels of employment land are made available within each district and that the local authority should ensure its evidence base is both up-to-date and reflective of the needs of the business community.

Cannock Chase Market Intelligence Report Final Report, April 2019

- 2.8 Lichfields consultancy was commissioned by Cannock Chase District Council ('CCDC') in 2019 to provide commentary on the appropriateness of the employment land site options in CCDC's emerging Local Plan to meet the land requirements set out in the Economic Development Needs Assessment ('EDNA'), also undertaken by Lichfields, in April 2019. It expanded on the market analysis outlined in the EDNA, informed by discussions with stakeholders, to feed into the Council's ELAA process.
- 2.9 The site locations from the 2018 ELAA, were grouped as per the emerging Local Plan Employment Land Options, from a market perspective to test how appropriate they were to meet the overall requirements.

Cannock Chase Existing Employment Areas Study, October 2019

- 2.10 This was also prepared by Lichfields on behalf of CCDC. It considers the District's existing employment sites and the degree to which there is scope for these sites to contribute to meeting future need, as well as seeking to establish if opportunities exist for additional development in these locations. It indicated that the District contains a reasonable range of employment sites of differing qualities and types, with relatively low vacancy levels. It was concluded that all 22 existing employment areas should be retained within the employment land supply.
- 2.11 At the time of assessment, the existing Watling Street Business Park was considered to be of average quality. The study recommended that:
 - "Maintain current approach of retaining for employment use, with proposals for future employment development treated positively given it is unlikely that the site will be suitable for alternative uses."
- 2.12 It is important to note that this study focused on the quality of the existing employment areas at the time it was prepared. While for some sites the study states a figure for the potential contribution to the District's land supply that the redevelopment, or further intensification, of the existing sites could make; these quanta were mostly taken from the 2018 Employment Land Availability Assessment.
- 2.13 RPS are concerned that the Council are reliant on the Existing Employment Areas Study for information on the quality of sites given that it was prepared in 2019, since which time the market has been affected by the impacts of the Covid-19 Pandemic and Brexit. RPS note that Paragraph 1.12. of the Procedure Guide for Local Plan Examinations states:
 - "Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As

- a minimum, any such documents should be updated as necessary to incorporate the most recent available information" (*Emphasis* added)
- 2.14 This is particularly pertinent given that, as noted above, the Existing Employment Areas Study draws upon assessments of development capacity that are derived from the 2018 Employment Land Availability Assessment.

Cannock Chase Economic Development Needs Assessment Covid-19 Update, December 2020

- 2.15 Lichfields was commissioned by CCDC in 2020 to provide an update of the Council's EDNA produced previously. The 2019 EDNA incorporated an extension to the Local Plan period (to 2018-2036/38) and provided the objectively assessed need ('OAN') for B-Class employment land over the new plan period, having regard to updated planning policy documents and data releases.
- 2.16 In light of the pandemic response, and the uncertainties surrounding the consequences of Brexit and the new E Class, Lichfields was asked to revisit and update the 2019 EDNA, factoring in their understanding of the local impacts of the pandemic within the district to date based on the latest available data. This included an analysis of the latest econometric forecasts for how the district's economy may change and the effect on different sectors over the short and medium-term and test the impact on key industrial sectors.
- 2.17 Through this report it was reaffirmed that Cannock Chase District has many advantages for commercial development, with excellent strategic road accessibility, the proximity of the West Coast Mainline, competitive business costs, access to a significant labour force, and existing strengths in the burgeoning wholesale and distribution sector.
- 2.18 In relation to growth scenarios for Cannock Chase, namely 'Regeneration', the Lichfields report stated that, as before, Cannock Chase shows growth in certain sectors which one or more of the Strategic Economic Plans highlighted as being target sectors within which the region has an opportunity to develop a competitive advantage in. For instance, there is forecast to be a very substantial increase in land transport, storage and post in the latest set of Experian projections alongside specialised construction industries.
- 2.19 In relation to the amount of B Class employment land required in the plan period 2018 to 2038, the EDNA Update recommended that Cannock Chase District's employment land OAN should comprise a range between 48ha and 66ha net between 2018 and 2038 (including flexibility), which equated to the Experian Scenario (1) at the lower end and the Medium-term Past Take Up Scenario (7) at the upper end. The range makes no allowance for the replacement of losses. The Council were recommended to take a decision regarding the extent to which additional provision should be planned for, over and above the net requirement. The range rises further to between 63 ha and 81 ha if losses are replaced at 0.756 ha per annum. It was noted, however, that these figures are indicative only.

Cannock Chase Economic Development Needs Assessment Update Report, 8 January 2024

2.20 Since the 2020 EDNA was completed, we have seen the end of Covid-19 lockdowns, but an ongoing cost of living crisis, and the unforeseeable economic shocks resulting from the wars in Ukraine and Israel has resulted in all aspects of the region's economy having been impacted in some way. Lichfields was therefore asked to review the economic conditions and trends using the latest September 2023 Experian forecasts. The report also analysed the implications of the latest 2021 Census data for the district as well as other economic indicators, as well as the labour supply implications of Cannock Chase accommodating some of the unmet housing need from the adjoining Black Country authorities. This study also incorporated revised take up and losses data over the past three years, as well as incorporating the latest CoStar data relating to vacancy rates, availability, absorption rates and other market indicators.

2.21 The outputs of this EDNA report can be summarised as follows:

- The forecasting models for employment growth in the EDNA (econometric modelling) supports a higher employment target;
- Identifying a higher target accounts for losses incurred when sites identified for employment are lost to alternative uses;
- Whilst the district has a strong stock of employment land and business parks, not all of the
 existing areas are suited to the identified type of industry where growth is predicted. The
 logistics and distribution industry has higher land requirements;
- The Council supports economic development and growth and this aligns with the Councils Corporate Plan (2022-2024);
- The EDNA Identified a higher target of between 65 to 94Ha gross employment land (taking
 into account an annual loss of 1Ha per annum). Pursuing a higher employment target gives
 greater flexibility to account for losses and be within the gross need range;
- The introduction of more stringent energy efficient targets means there could be a greater loss of stock in the plan period (taken into account with the loss figures, as set out in Paragraph 4.91 to 4.93 of the EDNA). By having a larger need figure gives the Local Plan greater flexibility to accommodate these losses;
- The employment need based solely on the unmet Housing Need Identified in the current Local Plan (Standard Methodology+500 units (Scenario 4 of the EDNA) of 68.19Ha is BELOW the Experian baseline figure of 74.09Ha (Scenario 1 of the EDNA) (Table 4.19 of the EDNA).
- The Experian Baseline growth figure of 74.09Ha is the minimum figure that should be provided for as this is based on the latest economic growth forecasts. There is no justification in the EDNA to plan for a need below this figure. Note: the Experian baseline scenario forecasts a lower level of job growth than before, of 3,000 net workforce jobs

rpsgroup.com

between 2018 and 2040 compared to 3,900 previously. However, a higher proportion of this net job growth is directly attributable to future success in sectors that have an Employment Land component, specifically Land Transport, Storage and Post, which alone is projected to contribute 3,100 net job growth over the next 20 years, a big uplift on the 1,900 net growth previously. This results in a higher level of employment land required, up to 74 ha (gross) now.

Cannock's Employment Requirements – Local Plan 2018-2040 Regulation 19 Consultation Version

Quantitative Requirements

- 2.22 Following on from the EDNA and subsequent updates, the draft employment policies of the district are currently set out through the Regulation 19 consultation version of the Plan.
- 2.23 The EDNA (Lichfields, 2019) produced a land requirement in the form of a range of between 33ha and 74ha to 2038. An update was produced by Lichfields to reflect changing economic conditions due to the Covid 19 pandemic in December 2020 which recommended the final land requirement of between 48 ha to 66 ha net between 2018 to 2038 or between 63 ha and 81 ha if losses are replaced at 0.756 ha per annum.
- As mentioned above at para 2.15, the Council has commissioned consultants Lichfields to undertake an update to the EDNA (8th January 2024) to reflect the extension to the plan period and ensure that the latest available data and economic projections have informed the final Local Plan land requirement target. The latest recommendation is to plan for a range has increased to between 43ha and 74ha. The 43 ha net figure is equivalent to the Scenario 3) Current SM + flexibility. The 74 ha figure relates to the upper end of the scenarios (specifically Scenario 8 Long term past take up, including flexibility, but net of churn). All of the scenarios sit within this range.
- As quoted in para 5.8 and 5.9 of the EDNA, this is not the case for the longer term, which identifies a gross need for 94 ha compared to 93 ha previously, as the slowdown in take up over the past three years is ameliorated over a longer time frame and is outweighed by the inclusion of two extra years (2038-40) in the forecast. Consequently, Cannock Chase District's employment land range is between 43 ha and 74 ha net for the period 2018 to 2040 (including flexibility). This range makes no allowance for the replacement of losses.
- 2.26 This informed the final employment target in the Reg 19. Local Plan of up to 74 hectares of employment land will be provided to meet the district's employment need. Sites were identified to meet this target in addition to 10ha located outside of the District at the West Midland Strategic Rail Freight Interchange (WMSI). This was identified on the basis of evidence which showed that the scale of employment land supply at the WMSI would contribute towards the employment need of a number of immediately adjoining authorities to differing degrees. This contribution is unchanged from the earlier Reg.19 document, which was previously approved by Cabinet in August 2022, although not formally consulted upon.

- 2.27 In terms of employment land supply, there has been some loss of land for employment where the identified use of the site has changed to residential and where some sites have been determined to not be deliverable. The Council's current land supply figure against the 74ha target results in a shortfall of -0.949ha.
- 2.28 The final proposed employment site allocations have been reviewed to ensure that sufficient sites are allocated to meet the identified requirement. An additional site has been proposed for allocation as detailed in the following section of this report 'amendments to sites'. The final Local Plan target of 74 ha is at the top end of the range provided in the EDNA.
- 2.29 The spatial strategy of the emerging Local Plan, which aims to meet the development needs arising from the district, the pre-submission draft Local Plan proposes that, 'up to 69 hectares of new employment land will be provided to meet the district's requirements'. RPS presumes this in an inadvertent error that has been missed through the course of updating the consultation documents but wishes for this position to be corrected or clarified, to the correct figure of 74 hectares. This error follows into the Policy introduction for Policy SO4.2.
- 2.30 Paragraph 6.130 of the introduction to Policy SO4.2 [Provision for New Employment Sites] sets out that the EDNA (2024) recommends that a range of employment land of 46 to 69 hectares (net) including flexibility is made during the period 2018-40 split between the following uses:
 - 85% industrial/distribution and warehousing;
 - 15% office Class E(g)(i)/(ii)/(iii) (office and light industrial)
- 2.31 The ELAA monitors the supply of employment land in the district. It provides a list of sites which are readily available for employment such as sites which have planning permission and also includes sites put forward for consideration for employment purposes. The ELAA identified that there have been 16.59 hectares of employment land completed since 2018. This completions figure is also confirmed within the ETP (Dec 2023) at para 5.3.
- 2.32 Policy SO4.2 goes onto outline that "The Local Planning Authority will provide for up to 74 hectares of land for office, manufacturing and distribution employment development during the period to 2040".

3 EMPLOYMENT SUPPLY IN CANNOCK CHASE DISTRICT FOR NEW PLAN PERIOD 2018-2040

Completions (since 2018, start of new plan period)

- 3.1 As part of the review process of the employment evidence base for Cannock Chase District, it is necessary to undertake a review of the employment land supply for the new plan period, to make an informed assessment of the levels of employment land available to meet the district's needs through the new Local Plan. For this reason, RPS discounts the sites accounted for in Appendix F 'Site Lists' Completed sites for all sites prior to 1st April 2018. This equates to a completions figure between 2018-2023 of 17.44ha. RPS considers therefore that the Council have made a miscalculation in error, given at para 5.3 of the ETP the Council purport a completions figure of 16.59ha.
- 3.2 No discount has been made by RPS regarding the individual sites that make up this 17.44ha figure, for the reason that the sites in question are within Use Class is E(g) (formerly B1) or B2 or B8. The status of the itemised completions is therefore not in dispute.

Supply - Employment Land Availability Assessment

- 3.3 The Council's 2023 Employment Land Availability Assessment ('ELAA') appendices of sites updates the previous ELAAs and covers the period from 1st April 2006 to 31st March 2023. Given the detailed breakdown of supply, RPS are able to omit sites completed prior to 1st April 2018 to provide a new calculation of total supply (2018-2023), alongside the new Local Plan and our previous assessment of 'readily available' sites, it is possible to see what the balance of employment land supply is required. Through policies SO4.2 and SO4.3 of the emerging Regulation 19 Local Plan, a target of 74ha has been set to the end of the Plan period (2040).
- 3.4 The employment requirement for the plan period to meet the district's needs is unclear, as set out in the Spatial Strategy at para. 1.8 of the Reg 19 Plan, it states up to 69ha of employment land will be provided. However, at Policy SO4.2, it states the LPA will provide for up to 74ha of employment land in the period up to 2040. The Plan's approach is unclear and therefore as presently worded, not effective under the soundness test, so this should be amended.
- 3.5 The Council has sets out a commentary detailing their employment land supply position within the ETP document. The ETP provides an Employment Land Supply commentary and table at paragraphs. 5.2 onwards.
- The first step of the employment land supply position is to establish the number of completions since 2018 (i.e., the start of the new Plan period). For this exercise, RPS took the completions that have occurred since 2018/19 from the ELAA Site Lists Appendix F 'Completed Sites'. This gives a figure of 17.44 Ha (see completions table below) although the Council state at para 5.3 of the ETP that it is 16.59 Ha, even though this differs to the completions table provided in the appendix of the ETP.

Appendix 1 - Employment Completions in Cannock Chase

County Site ID	CCDC	Site Name/Location	Easting	Northing	Previous Use (see notes)	Completed (ha)	Completed (sqm)	Use Class	Notes
43050	CE4(h) Part 1	Kingswood Lakeside, Blakeney Way, Cannock	399674	308217	4	3	13,154	E(g)/B2/B8	Completed 2018/19 (CH/16/465)
*	CE66	A T P Industries Group Ltd, Cannock Wood Industrial Estate, Cannock Wood	402970	312659	3	0.07	600	88	Completed 2018/19 (CH/17/328)
43076	CE7(a)	Former Hawkins Works, Watling Street, Bridgtown, Cannock	397577	308700	3	0.5	2,373	B8/E(g)(i)	Completed 2018/19 (CH/17/164)
	CE7(0)	Former Hawkins Works, Watting Street, Bridgtown, Cannock	397552	308655	3	0.5	1,983	B8/E(g)(i)	Completed 2018/19 (CH/16/457)
43091	CE5(a)	Kingswood Lakeside-zone E, Kingswood Lakeside, Cannock	399095	308443	4	2.3	9,146	82/B8	Completed 2018/19 (CH/17/150)
43096	CES	Former Bowmur Haulage Site, Watting Street, Cannock	397082	308869	3	2.6	13,223	E(g)/B2/B8	Completed 2018/19 (CH/16/260)
43050	CE4(h) Part 2	Kingswood Lakeside, Blakeney Way, Cannock	399674	308217	4	3.5	13,154	88/E(g)(i)	Completed 2019/2020 (CH/16/465
	CE59	Land adjacent to, Unit 2, West Cannock Way, Cannock Chase Enterprise Centre, Hednesford	400762	314105	3	0.07	212	Sui Generis/ E(g)(i)/B2	Completed 2020/2021 (CH/15/0162)
	CE67	Land at Lakeside Boulevard, Cannock	398356	308307	3	0.72	855	Sul Generis/B2	Completed 2020/2021 (CH/17/430
*	CE68	110 Walsall Road, Cannock, WS11 0JB	398284	309319	3	0.05	165	E(a),E(b) & E(g)	Completed 2020/2021(CH/19/270)
43050	CE4(a)	Plot D, Blakeney Way, Cannock, WS11 8LD	400036	308203	4	1,49	6,132	B2	Completed 2020/21 (CH/19/274)
-	CE78	Asda, Avon Road, Cannock, WS11 1LH	398030.6	309790	3	0.21	191.8	88	Completed 2021/22 (CH/20/179)
43052	RE2 (a)	Towers Business Park Phase II, Wheelhouse Lane, Rugeley	404992	317626	4	1.4	1074	82	Completed 2021/22 (CH/17/255)
2	NE13	Norton House, Norton Canes Business Park, Norton Green Lane, Norton Canes	401752	307664	3	0.18	390	E(g)/B8	Completed 2021/22 (CH/19/029)
	The second	3*53017 200 0E00010F131 0FE-11110-001		307.571.00		1.79			
-	CE77	Partsworld Group Ltd, Orbital Way, Cannock, WS11 8JB	399071	308679	3	0,35	2228	88	Completed 2022/23 (CH/21/0050)
¥.	CE79	Land off Progress Drive, Cannock, WS11 0JE	398448	309050	3	0.24	40	E(g)	Completed 2022/23 (CH/21/0353)
	CE80	Units 4-10 Lakeside Business Park, Cannock, WS11 0XE	397,775	308231	3	0.26	2310	E/B2/B8	Completed 2022/23 (CH/21/0399)
						17.44		_	
		New sites	11.93	1		11.77			
		Redevelopments	5.51						
		ECON- CO PORTED C	17.44						

Figure 3.1 Extract of Appendix 1 of CCDC Employment Topic Paper - Completions 2018-2023

3.7 The second stage in calculating the employment land supply is to consider what sites may be available for development over the plan period. RPS calculate the employment land supply, based on paras. 5.5 – 5.14 of the ETP equates to:

Table 3.1: Summary of Council's Assessment of Employment Land Supply based on ETP

Supply element	Area (Ha) – Council's ETP Figures		
Completions	17.44		
Under construction	3.43		
West Midlands Rail Interchange	10		
New Site Allocations	22.81		
Employment Sites for Intensification	15.91		
Planning Permission	4.6 (4.75 Ha accounted for in New Site Allocations)		
Total	74.19 (+0.19 Ha above Council's target)		

- 3.8 Based on this calculation, it is unclear how the Council conclude at para 5.14 of the ETP that the outstanding need of 0.949Ha gross exists. RPS presumes this is merely an honest miscalculation.
- 3.9 RPS has assessed each of these sites identified for employment development or further intensification. For multiple reasons, set out below, there are a number of sites currently included within the Council's expected supply that, for reasons detailed below are not considered deliverable by RPS's assessment.

Readily Available vs Not Readily Available Supply

- 3.10 The Council have included sites within their supply that are assessed as either being 'readily available' or 'not readily available'.
- 3.11 'Readily available' is defined by the Council at paragraph F.4 as "Sites that are assessed to be suitable and available for development and that development will be achieved in either the short-medium term or medium to long term". The PPG sets out a recommended methodology for producing these outputs and for ensuring the assessment is robust. Sites are assessed based upon their suitability, availability, and achievability. At para 2.35, the ELAA states: "In general, those development sites that are considered 'Readily Available' on suitability terms benefit from planning permission; permission has recently expired; are the subject of current planning applications or Preapplication enquiries; or are identified within the Local Plan as a key location or allocation".
- 3.12 One weakness in the Council's evidence base is that as set out at paragraph 4.25 of the Site Selection Methodology July 2023, many sites identified in Policy S04.3 rely upon an Existing Employment Areas Study undertaken by Lichfield's in 2019 and have not been assessed more recently. Paragraph 1.12. of the Procedure Guide for Local Plan Examinations states:
 - "Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As a minimum, any such documents should be updated as necessary to incorporate the most recent available information" (Emphasis added)
- 3.13 Given the combined impact of the Covid-19 Pandemic and Brexit it is reasonable to question the reliance upon the Existing Employment Areas Study as it was prepared in 2019. RPS strongly recommend that this document is updated before the submission of the Cannock Chase District Local Plan.
- 3.14 As noted earlier in section 2, the Existing Employment Areas Study draws upon assessments of development capacity that at the most recent are derived from the 2018 Employment Land Availability Assessment. As this is not publicly available, it is possible that the assessments may actually be even older.
- 3.15 RPS note that sites considered in the ELAA may be considered to be 'not readily available', but that this is an assessment undertaken at a particular moment in time, and such sites may become 'readily available' over the plan period of the Cannock Chase District Plan. We have identified such sites below as 'not readily available' and noted where their inclusion in the proposed employment land supply for intensification relies upon the potentially outdated 2019 Existing Employment Areas Study. We recommend that such sites are reassessed through an update to the Existing Employment Areas Study prior to submission of the Cannock Chase District Local Plan.

- 3.16 There are a number of sites currently included within the Council's expected supply that, despite being included in the employment site allocations policies are not considered available, suitable or achievable. Detailed reasons to each of the sites included as allocations are set out below.
- 3.17 Each of the sites referred to below are shown on the accompanying map (Appendix A) which indicates the location of each of the sites that have been considered.

Policy SO4.2 'New Employment Sites'

SE1 (ELAA Ref. CE18) - Kingswood Lakeside Extension 2, Norton Canes (Map Reference #1)

3.18 Notably very significant constraints across the site that may require costly remediation in advance of any commencement of development (possible diversion of overhead powerlines) and geotechnical issues with coal mining legacy. RPS does not make a discount in supply, given the Council's figure is already a small proportion of the wider site area, and concept diagram set out on page 186 of the site allocations proformas takes note of the constraints and has subsequently positioned any future development accordingly. Whilst there are likely major constraints on the site, RPS does not make a discount to the already reduced employment land figure. (no adjustment).

SE2 (ELAA Ref. NE12) - Watling Street Business Park Extension (Map Reference #2)

3.19 It is considered that proposed development can be designed such that it will not result in any significant increase in noise or loss of amenity at the residential canal moorings. RPS agree with the Council that the extension provides a net developable area of 7.36ha. **(no adjustment)**.

E4 (ELAA Ref. RE3) - Former Power Station off A51 (adjacent to Towers Business Park) (Map Reference #3)

3.20 Site formed part of wider outline planning application CH/03/0378 granted in September 2005 and was identified for employment development. Residential element of the wider site is being developed, but time period for the implementation of reserved matters for the employment development has expired. ELAA states that the owner is still considering employment development and the site location means that it could be linked to the proposals for RE24. Site is considered readily available. (no adjustment).

SM1 (ELAA Ref. RE24) - Rugeley Power Station, Rugeley (Map Reference #4)

3.21 Whole site (cross boundary with Lichfield DC) proposed for residential led mixed use redevelopment following closure of the power station in the short term. Site subject of adopted development brief Supplementary Planning Document (adopted jointly with Lichfield DC) and outline planning application CH/19/201 which includes 5ha of employment land for B1/B2 class use, which is cross boundary (circa 3.5ha indicative only within CCDC). Decommissioning and site clearance expected within circa 4 years. Site also included within SHLAA Site Ref R127. Part of site (forming golf course) lies within Flood Zone 2/3. Green Space Network. Historic Landfill. Significant demolition required. Ground remediation works have begun. Discharge of Conditions has begun and submission of further applications on the site and Reserved Matters. (no adjustment).

E6 (ELAA Ref. RE29) - Land at the Academy Early Years Childcare (Former Talbot Public House), Main Road, Brereton (Map Reference #5)

3.22 Planning application pending decision currently for new children's care home and supported living unit. A departure from office space proposed as part of a 2018 planning application. This is a clear signal of intent by the applicant to carry out a different project. Children's care home not an employment use, the site area is subsequently discounted from the supply. (0.14ha removed).

E14 (ELAA Ref. CE71) - Hill Farm, 84 Hayfield Hill, Cannock Wood, Rugeley (Map Reference #6)

3.23 Retrospective planning permission (CH/19/173) granted in July 2020 for 28sqm unit as B1 Use Class (built 2016) and confirmation of B1 use for all other existing buildings. Site already complete before new plan period, as it was retrospective. Should not be included in supply for new Plan period from 2018. RPS have therefore discounted from supply. (0.55ha removed).

E16 (ELAA Ref. NE1) - Land off Norton Green Lane, Norton Canes (Map Reference #7)

3.24 Part of the wider business park was built out earlier through historic consent from 2001, as a result there are limited details on file. RPS considers there is a clear lack of interest in developing the site for a long period of time (over two decades) and lack of marketing makes delivery questionable. The site remained vacant (in reference to Google Street View) in April 2023. In addition, the site is known to be a former landfill site, as part of the wood/coppice immediately to the west, this presents constraints on future development. The ELAA also states that the Site is currently being used as a construction test/training site by tenant of unit 17 (Central Construction Training Ltd) so unavailable for further units at present. The ELAA classes the site as readily available. It does not note when this current use is expected to cease. RPS therefore consider the site not readily available. (0.56ha not readily available).

Policy SO4.3 'Intensification of existing sites'

3.25 RPS recognise the Plan will provide for its employment land requirements through the identification of currently vacant sites for development, and the intensification of underused employment areas. It is realistic to account for the fact that over the lifetime of the Plan other sites will come forward for development through the recycling of underused land within existing employment areas, this can be through change of use to existing premises, or intensification of existing employment operations through development of yards / replacement buildings / new floor space.

Ridings Park (plots 8-10) (ELAA Ref. CE3) - Eastern Way, Hawks Green, Cannock (Map Reference #8)

3.26 Part of wider business park built in 2000s, lack of interest over a long period of time and lack of marketing makes delivery questionable. Extant planning permission for 2 industrial units, under ref. CH/18/020 was granted May 2018 and therefore the permission has lapsed. Site was considered deliverable in the 2019 Existing Employment Areas Study. Recent Street View Imagery from July 2023 shows site has not commenced or completed. The Council's ELAA evidence base categorises the site as 'Not readily available – restricted and excluded' meaning by definitions set out in the

ELAA the site is not currently known to be deliverable or available in the medium-long term. RPS agree with this assessment. (0.69ha not readily available).

Former Hawkins Works (ELAA Ref. CE7d) - Watling Street, Bridgtown, Cannock (2 sites) (Map Reference #9)

3.27 Extant permission, CH/16/156 is full planning permission for the erection of an industrial unit for B1/B2/B8 use, granted September 2016. Discharge of conditions application approved October 2017. The site was separated into 2no. phases. Phase 1 is completed and recent Google Street View (June 2023) imagery suggest work on Phase 2 has not been completed. The proposed location of the new unit via the extant planning permission is on part of the wider site which appears (by satellite imagery) to be currently used for metal working / JCB excavators. Site was considered deliverable in the 2019 Existing Employment Areas Study and readily available in the 2023 ELAA. However RPS note that the use of the site for metal working means the deliverability of the remainder of the extant consent is unclear and so consider the site to be 'not readily available' (0.69ha not readily available).

Gestamp (ELAA Ref. CE61) - Watling Street/Wolverhampton Road, Cannock (Map Reference #10)

3.28 Site to be vacated by current occupier and was being proposed for redevelopment (residential led with element of employment through ref. CH/17/323) – this was withdrawn in June 2019. However, site is no longer being promoted for this redevelopment. May be future opportunities for employment led redevelopment, however the Council categorise this in the ELAA as a 'not readily available – restricted and excluded site', and as per the definitions set out within the ELAA the site is not currently considered deliverable or available in the medium-long term. Site was considered deliverable in the 2019 Existing Employment Areas Study. RPS agree with this assessment. (0.8ha not readily available).

Delta Way Business Park (ELAA Ref. CE69) - Longford Road, Cannock (Map Reference #11)

3.29 Planning permission for extension of floorspace to existing building has expired. No evidence from street view or satellite imagery that any work has been carried out – dated May 2022. Site was considered deliverable in the 2019 Existing Employment Areas Study. Site considered readily available in 2023 ELAA Therefore, no discount is made from supply (no adjustment).

Albion Works, Gestamp Tallent (ELAA Ref. CE72) - Wolverhampton Road, Cannock (Map Reference #12)

3.30 The site received planning permission under ref. CH/20/058 for a two phase development including the demolition of five existing buildings and the partial demolition of one building, removal of protected trees, formation of hardstanding for the storage and display of cars, landscaping, external alterations to retained buildings and change of use of site to car dealership including repair and maintenance and associated works Phase 1 to comprise of demolition of the existing George Wimpey building, realignment of the existing fence line, removal of trees, external alterations to retained building A to facilitate use as a vehicle display area with associated ancillary cafe/office alterations to the retained building E for use as a vehicle preparation area, creation of new

landscaping, formation and making good of hardstanding and replacement of existing gatehouse. Phase 2 to comprise of demolition of buildings C1, C2, D and E, regrading of land to remove existing ramp and embankment and creation of new ramp, new gatehouse to Wolverhampton Road, formation and making good of hardstanding for vehicle display/storage and external alterations to building B to facilitate use of vehicle maintenance/repair - granted May 2020.

3.31 Planning consent expired and subsequently has not been built out as expected, no demolition appears to have commenced at 14/03/2022 based on Satellite Imagery and Google Street View taken in October 2023 suggests demolition hasn't taken place. Site was considered deliverable in the 2019 Existing Employment Areas Study and readily available in 2023 ELAA Therefore, no discount is made from supply (no adjustment).

Towers Business Park Phase II (ELAA Ref. RE4) - Wheelhouse Lane, Rugeley (Map Reference #13)

Outline consent CH/19/123 has expired and therefore uncertainty exists on the likelihood the development will come forward in the plan period. Notably, the landownership of the site is split and subject to sale. Part of the site 0.31 benefits from consent under application reference CH/20/064 which was granted in June 2021 and so still extant, although it is not clear if this consent has been implemented. However, this sub area is counted under Power Station Road (ELAA Ref RE4a) discussed below so is being double counted. Site was considered deliverable in the 2019 Existing Employment Areas Study and readily available in 2023 ELAA. (reduce readily available supply by 0.31 due to double counting).

Granurite Ltd and Rugeley Tyre Service (ELAA Site RE28), Bostons Industrial Estate, Power Station
Road, Rugeley (Map Reference #14)

3.33 The planning application represents intensification of employment use of the site. There is demonstrably continued work is being made towards full discharge of conditions. The site is currently occupied by Howdens and Tyre Services (formerly B1/B2 or B8 uses). The site is therefore in employment use regardless of new planning permissions. Site was considered deliverable in the 2019 Existing Employment Areas Study and readily available in 2023 ELAA. Therefore, no discount is made from supply (no adjustment).

Power Station Road, Rugeley (ELAA site RE4a) (Map Reference #15)

3.34 There is a full planning permission for the erection of a new unit. Recent Google Street View (June 2023) suggest work has not commenced but does not expire until June 2024. Site was considered deliverable in the 2019 Existing Employment Areas Study and readily available in 2023 ELAA. RPS therefore retain in the supply as the proposed development is currently considered deliverable. (no adjustment).

The Lead Mill (ELAA Site NE14), Rolling Mill Road, Cannock, WS11 9UH (Map Reference #16)

3.35 The site benefits from a recent planning consent for a new storage unit in October 2022, the wider site is occupied and is considered likely to be implemented. Site was considered deliverable in the

2019 Existing Employment Areas Study and readily available in 2023 ELAA. RPS therefore retain in the supply as the proposed development is currently considered deliverable (no adjustment).

Former JCB (ELAA Site RE30), Rugeley (Map Reference #17)

3.36 The building remains vacant and a planning application to allow B8 use in addition to the approved B2 use was withdrawn in April 2022. The site is an existing unoccupied building and so if brought into use would contribute to the employment land supply but at present it cannot. Market interest unknown but it is being marketed by Burley Browne. The site is also listed as 'Not readily available - restricted and excluded' by Council ELAA, which by the Council's definition means the site is not currently considered deliverable nor available in the medium-long term. Site was considered deliverable in the 2019 Existing Employment Areas Study. RPS agree that the site is currently not readily available. The ELAA provides a site area of 2.88 ha whereas policy S04.3 gives a site area of 3 ha. It appears that the site area in the ELAA comes from the withdrawn planning application. Having measured the site RPS agree with the 3 ha figure (3 ha not readily available).

Former Porcelain Works (ELAA Ref. CE15b), Old Hednesford Road, Hednesford (Map Reference #18)

3.37 Full planning permission granted for KFC restaurant (approx. 0.29ha) and outline planning permission granted for B1/B8 workshop/warehouse (CH/11/0179), April 2012. KFC has since been completed. Metal working yard currently occupies area for granted outline planning permission for workshop/warehouse. It is also an old CCDC Site Ref CH/08/0101.

The site is a metal working site so an employment related use and therefore can remain in the supply. The Council categorise the site as 'not readily available - restricted and excluded' however. In addition, the Council have included the entire site area (including the KFC) into the area figure for the supply. The ELAA and indeed the outline site area is 0.25ha, so 0.25ha remains in RPS's assessment of supply, in effect removing the restaurant use as this is non-employment related use. The Council categorise this site within the ELAA as 'Not readily available – restricted and excluded'. Site was considered deliverable in the 2019 Existing Employment Areas Study. RPS agree that the site is not readily available. (0.25ha not readily available).

Former ATOS Origin Site (ELAA Ref. CE42), Walsall Road, Cannock (Map Reference #19)

3.38 The site falls within ELAA category 'not readily available - restricted and excluded'. Site was identified through the Development Capacity Study September 2023 for potential residential development but concluded to be retained for employment (3.2 ha not readily available).

Northwood Court, Hollies Avenue (ELAA Ref. CE62), Cannock (Map Reference #20)

The site comprises of an existing office building in situ. Roller shutters to windows clearly open in July 2023 Street View imagery with cars parked outside, suggests premises is in use / operation. 2023 ELAA categories the site as 'not readily available'. Site was considered deliverable in the 2019 Existing Employment Areas Study. As the site appears to be occupied its potential future

redevelopment would not appear to make a net contribution to the overall land supply (0.1 removed).

Unit 12 (ELAA Ref. NE7), Conduit Road, Norton Canes (Map Reference #21)

- 3.40 The site benefitted from planning consent ref. CH/15/0102 which is full planning permission for the refurbishment of an existing warehouse (B8) and the construction of no.5 industrial units (B2), granted June 2015. This has now expired.
- 3.41 Whilst the redevelopment of the site for 5 new units did not occur, the site remains in use as a metal working site (B8) and therefore RPS consider warrants retention within the employment land supply. 2023 ELAA categories the site as 'not readily available'. Site was considered deliverable in the 2019 Existing Employment Areas Study (0.7ha not readily available).

Cannock Wood Industrial Estate (ELAA Ref. CE75), Cannock Wood Street, Cannock, WS12 0PL (Map Reference #22)

3.42 The site benefitted from planning consent to retain bays 1 & 2 partially converted former covered aggregate bays into light industrial units B1 & B2, granted October 2020. Along with a further full permission to convert former aggregate bays 3-8 into Light Industrial B1 & B2 units, insert new mezzanine floors into all units 1-8, add toilet block extensions to all units, granted October 2020. Given the works involved an element of internal conversion, RPS cannot say with certainty whether the works have commenced or been undertaken, therefore no deduction to supply figure is made. The site is considered readily available in the 2023 ELAA and was considered deliverable in the 2019 Existing Employment Areas Study (no adjustment).

Yates Bros Sports and Social Club, Lime Lane (ELAA Ref. NE17), Pelsall WS3 5AS (Map Reference #23)

3.43 Subject to a refused planning permission, ref. CH/20/401 for prior approval for change of use to Offices (Class E), refused January 2021. Google Street View Imagery from October 2022 appears to show the Change of Use occurred anyway (unlawfully), given the site in traded in use as Building Solutions company 'Ashby Facilities'. Council categorises in ELAA as 'not readily available site restricted and excluded'. Considered deliverable in the 2019 Existing Employment Areas Study. Unclear how site area has been measured however, as the site is in operation RPS use the 'ha' figure listed in Policy SO4.3. (1.35 ha not readily available).

SE2 (ELAA Ref. NE12) - Existing Watling Street Business Park (Map Reference #2)

3.44 RPS recommend that the existing Watling Street Business Park is included in the list of sites in Policy SO4.3. While the redevelopment of the existing development (with the exception of the retained units) does not result in any additional land supply, it will result in a net increase of 7,303 sqm of floorspace created through the provision of a more efficient site layout see next section for further details (no adjustment).

Conclusions on Employment Land Supply

- 3.45 Following a critique of all the Council's sites listed in Policy SO4.2 and SO4.3 RPS calculates the total supply figure to be 72.241ha. RPS notes that the Council consider 11.2 ha of land within its proposed supply as 'not readily available'. RPS consider this figure to be incorrect and instead that there are 10.76 ha of 'not readily available' sites.
- 3.46 There are a number of 'not readily available' sites that were identified in the Existing Employment Areas Study 2019 that could potentially become available during the plan period and so are included in the table below. Overall RPS consider there to be 11.36 ha of 'not readily available' land included in the supply, whereas the Council assume there to be 9.87 ha.
- 3.47 Where there are discrepancies between the figures stated in the Council's policies and the figures stated in the 2023 ELAA we have utilised the 2023 ELAA figure for the Council's Assessment in the table below

Table 3.2: Summary of RPS Assessment of Employment Land Supply vs Council Assessment based on 2023 ELAA

Stage	Supply element	Area (Ha) – Council Assessment	Area (Ha) – RPS Alternative Assessment
А	Completions	16.59	17.44
В	Under construction	3.43	3.43
С	Planning Permissions (across the district)	9.35 (4.75 on new site allocations)	9.35 (3.5 on readily available new site allocations, 0.56 on not readily available site
			allocations)
D	West Midlands Rail Interchange	10	10
E	New Site Allocations without planning permission	18.06	16.81
F	Readily Available Employment Sites for Intensification	5.751	4.411
G	Not Readily Available Employment Sites for Intensification	9.87	10.8
Н	Total	73.051 (0.949 outstanding	72.241 (1.759 outstanding
		need)	need)

3.48 The Council's figure and RPS's figure differs. The Council's total supply based on the 2023 ELAA is assumed to be 73.051ha, which is 0.949ha below against the 74ha target. Whereas RPS's total supply figure is 72.241ha, which leaves a 1.759ha shortfall against the local plan target of 74ha.

4 WATLING STREET BUSINESS PARK

Existing Watling Street Business Park

- 4.1 The existing Watling Street Business Park currently occupies an area of 6.34 ha. The site is both owned and managed by St Modwen. The site is attractive to the employment market, given it is well located in relation to the strategic highway network being accessed of the A5 Watling Street and lying in close proximity to the junction with the M6(Toll), a location attractive to the expansion of existing businesses and providing opportunity for inward investment.
- 4.2 The existing Business Park was constructed in the 1960s and the last significant refurbishments were undertaken in 1985. The existing Business Park is in a poor state of repair, and it requires an extensive range of repairs and improvements. In addition, the design of the buildings and associated service yards do not meet the operational requirements of modern occupiers. The proposed redevelopment of the majority of the existing Business Park would result in the replacement of units that are the end of their economic life with high quality new units. It will create a highly sustainable development that will lead to a reduction in carbon emissions when compared to the existing Business Park.

Proposed Expansion of Watling Street Business Park

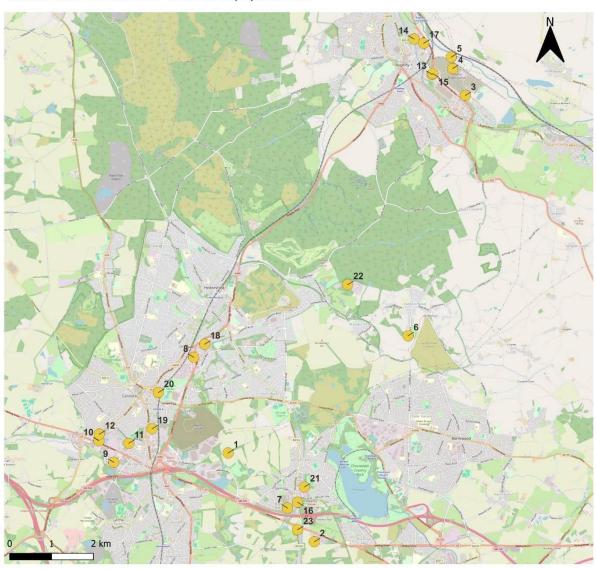
- 4.3 There is also clear potential to expand the existing Business Park in a sustainable way which meets the future requirements, expectations, and aspirations of Cannock Chase District Council. The site presents an excellent opportunity to deliver employment development, within the current plan period. In addition, the existing site presents an opportunity for intensification, creating additional employment floorspace that will be brought forward within the existing business park development to help meet the future requirements.
- 4.4 The expansion land (7.36ha net developable area) is situated immediately adjacent to the established Business Park and can benefitfrom the existing access and infrastructure serving the current development.
- 4.5 Proposed built development would be screened very effectively at the outset by the established framework of hedgerows, tree belts and woodland coppices located along the Site's perimeter. Such features will be retained as the basis for a comprehensive Green Infrastructure framework, which encompasses the site.
- 4.6 RPS and St Modwen are clear that the Site can deliver sustainable high quality employment development, that provides opportunities for employment development in a strategic location and provides development in a sustainable location by extending an existing Business Park and a brownfield / previously developed site.

5 CONCLUSION

- 5.1 This assessment has reviewed the proposed employment land supply for the emerging Cannock Chase Local Plan 2018-2040 including the removal of sites from the Green Belt, to help the district meet its employment land needs.
- 5.2 RPS has assessed the supply from the 2023 ELAA. This has resulted in an assessment which indicates rather than a very marginal undersupply of 0.949 ha of employment land, there is in fact an undersupply of some 1.759ha, when considered against the current requirement up to 2040. The reasons for this are site specific.
- 5.3 This shortfall in supply includes the intensification and expansion of Watling Street Business Park which would clearly make an important contribution to the district's future employment requirements. The expansion and intensification of Watling Street Business Park offers an excellent opportunity to provide a market specific provision which would help to meet the demonstrable demand for unit formats where demand is strong and assist the Council with closing the existing undersupply.
- 5.4 RPS consider that the employment land supply position in Cannock Chase District is such that there are clear exceptional circumstances to support the release of land from the Green Belt.
- 5.5 RPS note that the employment land supply for the overall plan period includes 11.36 ha of employment land supply considered by RPS to currently be 'not readily available'. Given that this is a small proportion of the overall land supply RPS consider that there is ample time for the Council to take any actions necessary to assist with sites becoming readily available and/or if necessary, undertake a review of the Cannock Chase Local Plan 2018-2040 if required to identify new sources of supply.

Appendix A: Regulation 19 Allocated Sites Mapped

Cannock Chase District Council - Allocated Employment Sites



- 1 SE1, Kingswood Lakeside Extension 2, Norton Canes
 - 2 SE2 (NE12), Watling Street Business Park Extension
 - 3 E4 (RE3), Former Power Station off A51 (adjacent to Towers Business Park) 4 SM1 (RE24), Rugeley Power Station, Rugeley

 - 5 E6 (RE29), Land at the Academy Early Years Childcare (Former Talbot Public House), Main Road, Brereton
 - 6 E14 (CE71), Hill Farm, 84 Hafield Hill, Cannock Wood, Rugeley 7 E16 (NE1), Land of Norton Green Lane, Norton Canes

 - 8 Ridings Park (plots 8-10) (CE3), Eastern Way, Hawks Green, Cannock
 - 9 Former Hawkins Works (CE7d), Watling Street, Bridgtown, Cannock (2 sites)
 - 10 Gestamp (CE61), Watling Street/Wolverhampton Road, Cannock 11 Delta Way Business Park (CE69), Longford Road, Cannock
 - 12 Albion Works, Gestamp Tallent (CE72), Wolverhampton Road, Cannock

 - 13 Towers Business Park Phase II (RE4), Wheelhouse Lane, Rugeley
 14 Granurite Ltd and Rugeley Tyre Service (RE28), Bostons Industrial Estate, Power Station Road, Rugeley
 15 Power Station Road, Rugeley (ELAA site RE4a)
 16 The Lead Mill (NE14), Rolling Mill Road, Cannock, WS11 9UH

 - 17 Former JCB (RE30), Rugeley 18 Former Porcelain Works (CE15b), Old Hednesford Road, Hednesford 19 Former ATOS Origin Site (CE42), Walsall Road, Cannock

 - 20 Northwood Court, Hollies Avenue (CE62), Cannock

 - 21 Unit 12 (NE7), Conduit Road, Norton Canes 22 Cannock Wood Industrial Estate (CE75), Cannock Wood Street, Cannock, WS12 0PL" 23 Yates Bros Sports and Social Club, Lime Lane (NE17), Pelsall WS3 5AS

This drawing has been prepared in accordance with the scope of RPS'sappointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used. Base map @ OpenStreetMap contributors. This pender available under the Open Database License: http://opendatacommons.org/licenses/odb/1.0/. Any rights in individual contents of the database are licensed under the Database Contents License: http://opendatacommons.org/licenses/dbd/1.0/