

Brownfield Land Register 2021  
Lichfield District Council

November 2021

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## 1. Introduction

- 1.1 Brownfield land has an important role to play in meeting the country's need for new homes. The revised [National Planning Policy Framework](#) (NPPF) published in 2018 (and its associated [planning practice guidance](#)) make clear that planning policies and decisions should encourage the effective use of land by reusing brownfield sites. The Government has made a commitment to maximising the number of homes delivered on suitable brownfield land and sees the production of statutory brownfield registers as being a key component to deliver this.
- 1.2 The adopted Lichfield District [Local Plan Strategy](#) and [Local Plan Allocations](#) also place importance on the use of brownfield land in delivering the District's development requirements. As such the production of a brownfield register will also assist the District Council in delivering the aims of the Local Plan.
- 1.3 The requirement for all Local Planning Authorities to produce a 'Brownfield Land Register' came into force in April 2017 through the [Town and Country Planning \(Brownfield Land Register\) Regulations 2017](#). This requires Local Planning Authorities to maintain and publish a register of brownfield land that is 'suitable' for residential development. The Brownfield Land Register (BLR) is to be split into two parts with 'Part 1' being a register of all brownfield sites which are considered to be suitable for housing and 'Part 2' identifying any such sites which are then to be granted Permission in Principle (PiP). Sites entered into Part 2 of the brownfield register will be granted permission in principle.
- 1.4 This document represents the Brownfield Land Register (Part 1) for Lichfield District Council. This document provides the annual update to the register which was first published in December 2017 and has been updated on an annual basis thereafter.
- 1.5 The [National Planning Practice Guidance](#) (PPG) was updated in July 2017 to introduce guidance for both BLR and PiP. Alongside the guidance the Department for Communities and Local Government (DCLG) published the '[Brownfield Land Register Data Standard: Preparing and publishing a register](#)'. The data standard document provides clear and exact guidance on the format and content of information which must be included on an authorities BLR to ensure that information is comparable across all authorities. The guidance within the PPG provides further detail on the role and purpose of the BLR along with information on how to update and maintain the register. The Lichfield District BLR has been produced taking account of this guidance and is consistent with the Governments data standard.

## 2. Methodology

- 3.1 The PPG makes clear that for the purposes of the BLR the NPPF definition of previously developed land is used: *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”*
- 3.2 The regulations and guidance require that all sites considered ‘suitable for residential development’ are included on BLR Part 1. Regulation 5 provides clarity and states that all land which falls within the description in paragraph 1(a) of regulation 3 and meets the criteria in paragraph 1 of regulation 4. In effect this means sites within the local planning authority area which are at least 0.25 hectares in size or capable of delivering 5 or more dwellings are suitable and available for residential development and that development is considered achievable. The regulations then further define what is meant by the terms ‘suitable’, ‘available’ and ‘achievable’. In order to identify sites for inclusion on the BLR the following methodology has been drafted.
- 3.3 The identification of sites will be undertaken in the following stages:
- Stage 1: Identification of potential brownfield sites;
  - Stage 2: Assessing suitability of sites;
  - Stage 3: Assessing availability & achievability of sites; and
  - Stage 4: Schedule of sites for BLR.

### Stage One: Identification of potential brownfield sites

- 3.4 Potential sites will be drawn from a number of existing sources of data which are held and published by Lichfield District Council. All potential sites must first meet the definition of previously developed land as set out within Annex 2 of the NPPF and be located within the Lichfield District administrative area. Potential sites will be identified from the following sources:
- Sites with extant planning permission for residential development (including sites with a resolution to grant planning permission for residential development) as published within the councils suite of monitoring documents;
  - Allocations and broad locations for residential development as set out within the adopted Local Plan and [‘made’ neighbourhood development plans](#);
  - Emerging allocations for residential development within the District Councils emerging development plan documents and emerging neighbourhood plans;
  - Sites contained within the latest published [Strategic Housing Land Availability Assessment](#) (SHLAA); and

- Sites submitted through the Council’s ‘[Call for Sites](#)’ and representations made through the local plan process to the base date set out within the latest published SHLAA. For the purposes of this initial BLR sites submitted through the Call for Sites process up to the date of publication have been considered through the four stage process outlined above.

3.5 After the initial identification of sites from the above sources an initial filtering process was undertaken which removed sites which were smaller than 0.25 hectares and/or not capable of delivering five or more dwellings<sup>1</sup>. Also removed at this stage were sites from all sources which were greenfield (or predominantly greenfield) and sites proposed for mixed use developments, where residential is not the primary land use. Such sites are therefore beyond the scope of the BLR.

3.6 Sites identified through previous versions of the Brownfield Register were reviewed.

### Stage Two: Assessing the suitability of sites

3.7 Those sites identified through stage 1 are then reviewed to determine whether sites are considered to be suitable for residential development. The regulations and guidance define land which is suitable for residential development as the following:

- Allocated sites;
- Sites with planning permission;
- Sites with grant of permission in principle; and
- Sites the LPA considers appropriate for residential development.

#### Allocated sites

3.8 Sites which are allocated within the adopted Local Plan and ‘made’ neighbourhood plans for residential development are considered to be suitable where they have passed through stage 1 of the BLR process.

#### Sites with planning permission

3.9 Where a site benefits from planning permission for residential development (including where these are under construction) it will be considered to be suitable. These sites are by definition suitable for residential development, as they have been subject to detailed testing through the decision making process.

#### Sites with permission in principle

3.10 Any site which has grant of permission in principle for residential development would be considered to be suitable. It should be noted that no such sites are identified.

#### Sites the LPA considers appropriate for residential development

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<sup>1</sup> The Lichfield District Strategic Housing Land Availability Assessment (SHLAA) includes a number of assumptions used to determine the potential capacity of a site. These same assumptions will be used for the identification with a 10% variance both above and below the SHLAA figure to provide an approximate minimum and maximum yield.

- 3.11 The regulations allow authorities to consider additional sites which are appropriate for residential development having regard to; any adverse impact on the natural environment; the local built environment including in particular on heritage assets; any adverse impact upon the local amenity; and relevant representations received.
- 3.12 Sites from the SHLAA which have been identified through stage 1 were then assessed to ascertain if they were considered appropriate for residential development taking into account information within the SHLAA and the adopted Local Plan. The SHLAA classifies sites as 'deliverable', 'developable' and 'not developable'. It must be noted that the Lichfield District Council SHLAA applies a 'policy off' approach to site assessment as such sites are not discounted based upon planning policies.
- 3.13 Those assessed as 'Not developable' are rejected as the SHLAA has assessed them as unsuitable for residential development. Sites which are assessed as 'deliverable' or 'developable' were then considered in the context of adopted local and national planning policy. Where sites are not considered to comply with current planning policy then they are rejected at this stage ([Appendix A](#) details all such sites). For example sites are not discounted within the SHLAA if they are in the Green Belt, where such a site is assessed through stage 2 of the BLR process it is considered to be unsuitable for housing development.
- 3.14 Following stage 3 sites that are assessed as being 'suitable' are progressed to Stage 3 of the assessment.

### Stage Three: Assessing availability & achievability of sites

- 3.15 Those sites which have passed through stage 2 are then assessed in terms of availability and achievability. The detailed SHLAA methodology includes the process for assessing a sites availability and achievability. Where a site has been assessed as being available and achievable within the most recent iteration of the SHLAA then it is assumed that this remains the case for the BLR. Additional information has been collected by the District Council through the [Urban Capacity Assessment](#) (UCA). This provided a detailed assessment of potential sites within the Districts built-up areas, particularly with regards to the availability of sites for residential development.
- 3.16 Where sites have the benefit of planning permission (or are under construction) or are allocated for residential development it is assumed the sites are available and achievable, unless information has been provided to the contrary.
- 3.17 Sites which are discounted at this stage are detailed at [Appendix B](#).

### Stage Four: Schedule of sites for the brownfield land register

- 3.18 Sites which have passed through the stages (as outlined above) and are considered to be suitable (in line with current planning policy), available and achievable are included on the Lichfield District Part 1 BLR is detailed at Table 1 (below). The full BLR can be downloaded and viewed via the attached excel document. There are 50 sites on the Part 1 BLR.
- 3.19 The information for each site is as set out within the Brownfield Land Register Regulations 2017, with maps of each site contained at [Appendix C](#).



- 3.20 Of those sites entered onto the Part 1 BLR only eight sites do not currently either benefit from planning permission or are subject to a planning application which is awaiting determination. Of the eight sites this applies to seven are proposed for allocation in the emerging Local Plan Allocations document. Given that a majority of sites are well advanced within the planning process it is not considered beneficial at this stage to produce a Part 2 BLR. It is recommended that this position be reviewed on an annual basis and/or following any legislative or policy changes.
- 3.21 There is not Part 2 Brownfield Register for Lichfield District.

Table 1: Brownfield Land register summary of sites

BLR site reference	SHLAA reference	Site name	Site size	Planning Status	Potential yield of dwellings (net)	Map reference ( <a href="#">Appendix C</a> )
LDC-BLR-1	1	Lichfield Highway Depot, Trent Valley Road, Lichfield	1.37	Not permitted	52-57	BLR-1
LDC-BLR-2	324	Land rear Chase Terrace Primary School, Rugeley Road, Burntwood	1.56	Development complete	Development complete	Development complete
LDC-BLR-3	5	Maple Close/Sycamore Road, Burntwood	1.33	Not permitted	29-35	BLR-3
LDC-BLR-4	6	Whittington Youth Centre, Main Street, Whittington	0.32	Permitted (Full planning permission)	8	BLR-7
LDC-BLR-5	7	Minster Hall Youth Centre, Lichfield	0.15	Not permitted	13-17	BLR-1
LDC-BLR-6	24	Shenstone Business Park and Birchbrook Industrial Estate, Lynn Lane, Shenstone	2.09	Not permitted (Pending decision)	45-55	BLR-6
LDC-BLR-7	25	Former Lichfield Tennis Club, Birmingham Road, Lichfield	0.45	Not permitted	16-20	BLR-2
LDC-BLR-8	33	Former Integra/Hepworth, Eastern Avenue, Lichfield	2.8	Development complete	Development complete	Development complete
LDC-BLR-9	37	St Chads House, Cross Keys, Lichfield	0.15	Permitted (Full planning permission)	12	BLR-2
LDC-BLR-10	n/a	Former Park Road Printers, Park Road, Alrewas	0.25	Development complete	Development complete	Development complete
LDC-BLR-11	42	Packington Hall, Tamworth Road	2.31	Permitted (Full planning permission)	28	BLR-7
LDC-BLR-12	43	Auction centre and land at Quonians Lane, Lichfield	0.81	Not permitted (Pending decision)	42-52	BLR-2
LDC-BLR-13	44	Former Regal Cinema, Tamworth Street, Lichfield	0.16	Development complete	Development complete	Development complete
LDC-BLR-14	46	Angel Croft Hotel, Beacon Street, Lichfield	0.27	Permitted (Full planning permission)	5	BLR-2
LDC-BLR-15	47	The Windmill, Grange Lane, Lichfield	0.31	Permitted (Full planning permission)	12	BLR-1
LDC-BLR-16	49	Land rear The Greyhound, Upper St John Street, Lichfield	0.15	Permitted (Full planning permission)	8	BLR-2

BLR site reference	SHLAA reference	Site name	Site size	Planning Status	Potential yield of dwellings (net)	Map reference ( <a href="#">Appendix C</a> )
LDC-BLR-17	50	Former Nursery, 41 Cherry Orchard, Lichfield	0.25	Development complete	Development complete	Development complete
LDC-BLR-18	91	Mount Road Industrial Estate (part), Mount Road, Burntwood	2.77	Permissioned (Full planning permission)	95	BLR-3
LDC-BLR-19	109	114 High Street, Chasetown, Burntwood	0.33	Development complete	Development complete	Development complete
LDC-BLR-20	n/a	Former Greyhound Public House, Boney Hay Road, Burntwood	0.54	Development complete	Development complete	Development complete
LDC-BLR-21	116	Former Acorn Garage, Queen Street, Chasetown, Burntwood	0.24	Permissioned (Full planning permission)	14	BLR-3
LDC-BLR-22	n/a	Ruegely Canal Side, Rugeley Road, Rugeley	1.8	Development complete	Development complete	Development complete
LDC-BLR-23	117	Land adjacent 84 Cherry Orchard, Lichfield	0.1	Not permissioned	8-10	BLR-2
LDC-BLR-24	n/a	1-3 Hill Street, Chasetown, Burntwood	0.12	Development complete	Development complete	Development complete
LDC-BLR-25	n/a	Former Royal Oak Public House, Uttoxeter Road, Hill Ridware	0.25	Development complete	Development complete	Development complete
LDC-BLR-26	133	Trent Valley Buffer Depot, Trent Valley Road, Lichfield	1.9	Not permissioned (Pending decision)	45-75	BLR-2
LDC-BLR-27	135	Beaconsfield House, Sandford Street, Lichfield	0.05	Permissioned (Full planning permission)	25-30	BLR-2
LDC-BLR-28	139	Hawthorn House, Burton Old Road, Lichfield	0.6	Not permissioned	26	BLR-2
LDC-BLR-29	140	Fradley Strategic Development Allocation (SDA), land off Gorse Lane, Fradley Park	12.0	Not permissioned (Pending decision)	250-350	BLR-4
LDC-BLR-30	141	Former Children's Home, Scotch Orchard, Lichfield	0.97	Not permissioned	24-31	BLR-1
LDC-BLR-31	142	Cottage of Content, Queen Street, Chasetown, Burntwood	0.24	Not permissioned	9-11	BLR-3
LDC-BLR-32	158	Former Bridge Cross Garage, Bridge Cross Road, Burntwood	0.34	Permissioned (Outline planning permission)	14	BLR-3
LDC-BLR-33	175	East of Burntwood Bypass Strategic Development Allocation (SDA), Milestone Way, Burntwood	10.5	Development complete	Development complete	Development complete

BLR site reference	SHLAA reference	Site name	Site size	Planning Status	Potential yield of dwellings (net)	Map reference ( <a href="#">Appendix C</a> )
LDC-BLR-34	248	Former 'What' Store, Cross Keys, Lichfield	0.3	Development complete	Development complete	Development complete
LDC-BLR-35	252	Fradley Strategic Development Allocation (SDA), Halifax Avenue, Fradley	34.0	Permissioned (Part outline & part full planning permission)	750	BLR-5
LDC-BLR-36	270	Boney Hay Concrete, Chorley Road, Burntwood	0.34	Not permissioned	7	BLR-3
LDC-BLR-37	285	The New Lodge, Kings Bromley Road, Alrewas	0.15	Not permissioned	6	BLR-4
LDC-BLR-38	n/a	Tricorn House, High Street, Chasetown, Burntwood	0.15	Development complete	Development complete	Development complete
LDC-BLR-39	287	Station Works, Colton Road, Rugeley	0.4	Not permissioned	14	BLR-9
LDC-BLR-40	292	Rugeley Power Station	83.8	Not permissioned (Pending decision)	820-880	BLR-9
LDC-BLR-41	n/a	Lombard Court, Lombard Street, Lichfield	0.13	Development complete	Development complete	Development complete
LDC-BLR-42	n/a	Former Beatrice Court, St John Street, Lichfield	0.36	Development complete	Development complete	Development complete
LDC-BLR-43	n/a	Land off Greenhough Road, Lichfield	0.5	Development complete	Development complete	Development complete
LDC-BLR-44	309	Levett Road, Lichfield	0.7	Development complete	Development complete	Development complete
LDC-BLR-45	316	Land off Milestone Way, Burntwood	4.4	Permissioned (Full planning permission)	150	BLR-3
LDC-BLR-46	319	Davidson Road, The Old Brewery Maltings, Lichfield	0.1	Not permissioned	6	BLR-2
LDC-BLR-47	323	Davidson Road, St John Street Garage, Lichfield	0.1	Not permissioned	6	BLR-2
LDC-BLR-48	138	Birmingham Road, Guardian House	0.65	Permissioned (Full planning permission)	65	BLR-2
LDC-BLR-49	242	High Street, 161-167, Chasetown	0.25	Permissioned (Full planning permission)	6	BLR-3
LDC-BLR-50	18	Land at Anson Road, Alrewas	1.07	Permissioned (Full planning permission)	23	BLR-4

<b>BLR site reference</b>	<b>SHLAA reference</b>	<b>Site name</b>	<b>Site size</b>	<b>Planning Status</b>	<b>Potential yield of dwellings (net)</b>	<b>Map reference (<a href="#">Appendix C</a>)</b>
LDC-BLR-51	59	Braeburn Close, Lichfield day centre	0.34	Not permitted	10	BLR-1
LDC-BLR-52	89	Lichfield Street, Tolsons Mill	0.85	Permission (Full planning permission)	110	BLR-5
LDC-BLR-53	174	Land south of Cannock Road	0.33	Development complete	Development complete	Development complete
LDC-BLR-54	255	Eastern Avenue, former Norgren site	1.3	Permission (Full planning permission)	70	BLR-1
LDC-BLR-55	326	Main Street & Lullington Road, Clifton Campville	0.74	Permission (Full planning permission)	16	BLR-8
LDC-BLR-56	329	Station Road, Bridge House, Lichfield	0.86	Permission (Full planning permission)	12	BLR-2
LDC-BLR-57	332	St Michaels Road, St Michaels Church Hall	0.14	Development complete	Development complete	Development complete
LDC-BLR-58	335	Land at Rotten Row & Aiden Court Road	0.19	Permission (Full planning permission)	29	BLR-2
LDC-BLR-59	65	Rotten Row, Lichfield Health and Fitness	0.41	Permission (Full planning permission)	14	BLR-2
LDC-BLR-60	364	Lichfield Street, Methodist Church Workshop	0.05	Permission (Full planning permission)	5	BLR-5
LDC-BLR-61	380	Birmingham Road, Shire House	0.23	Permission (Full planning permission)	18	BLR-2

## Appendix A: Schedule of sites rejected at stage two

Table 2: Schedule of sites rejected at stage two

SHLAA reference	Site Name	Reason rejected
74	Bonehill Mill, Lichfield Street	Majority of site is located within the Green Belt and is not within a defined village settlement boundary.
119	Shenstone Garden Centre, Birmingham Road, Shenstone	The site is located within the Green Belt and is not within a defined village settlement boundary.
177	Shenstone Employment Area	The site is within allocated employment area. Employment area. Therefore current planning policy would restrict land use to employment development.
206	Hungry Lane, Weeford	The site is located within the Green Belt and is not within a defined village settlement boundary.
231	Colton Mill Industrial Estate, Colton Road	The site is located within the open countryside and is not within a defined village settlement boundary.
240	Lyalvale Express, Fisherwick	The site is not within a defined village settlement boundary.
250	Fradley West, Gorse Lane, Fradley	The site is located within the open countryside and is not within a defined village settlement boundary. SHLAA notes that the site is part brownfield part greenfield.
330	Plantation Lane, Sir Robert Peel Hospital	The site is located within the Green Belt and is not within a defined village settlement boundary.

## Appendix B: Schedule of sites rejected at stage 3

Table 3: Schedule of sites rejected at stage 3

SHLAA reference	Site Name	Reason rejected
9	The Abattoir, Eastgate Street, Chase Terrace, Burntwood	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
45	29 Sandford Street, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
48	Queen Street Depot, Queen Street, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
73	Fazeley Saw Mill, Lichfield Street, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
87	Lichfield Social Club, Purcell Avenue, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
178	Mount Road Industrial Estate, Mount Road, Burntwood	Urban Capacity Assessment assesses part of the site as not being 'available'. Majority of site is currently operational industrial estate.
92	Land at Armitage Shanks, Old Road, Armitage	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'. Opportunities to explore availability of site should be explored.
110	Swan Island Garage, Swan Island, Burntwood	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
112	Redcourt House, Greenhill, Lichfield District Council	Urban Capacity Assessment assesses the site as not being 'available'. Site is currently used for retail units.
113	Redcourt Car Park, Green Hill, Lichfield	Urban Capacity Assessment assesses the site as not being 'uncertain' in terms of availability and deliverability. Site is currently a council owned/run multi-storey car park within the town centre. Current evidence suggests site is not available for development.
114	Spinney Lane Squash Club, Spinney Lane, Burntwood	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
129	Former HSBC Hire, Burton Road Streethay	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
131	Borrow Pit, Rugeley Power Station	Adopted LPA document, neighbourhood plan and Rugeley Power Station SPD seek to retain site as open space.

<b>SHLAA reference</b>	<b>Site Name</b>	<b>Reason rejected</b>
137	Royal Oak Public House, Main Street, Stonnall	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
151	Land at Tesco Store, Church Street, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'. Opportunities to explore availability of site should be explored.
171	Bird Street Car Park, Bird Street, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
230	Tolsons Industrial Estate, Mill Lane, Fazeley	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
232	Swan Road Car Park, Swan Road, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
233	Sandford Street Car Park, Sandford Street, Lichfield	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.
247	Former GKN Sinter, Trent Valley Road, Lichfield	Urban Capacity Assessment evidence suggests alternative non-residential uses being promoted and as such is not available for residential redevelopment. Opportunities to explore availability of site should be explored.
253	Former Olaf Johnson site, Cannock Road, Burntwood	SHLAA and Urban Capacity Assessment assesses the site as not being 'available'.



## Appendix C: Brownfield Land Register maps

The sites in this schedule be viewed using the interactive map on the council's website which can be viewed via the following link: [Land availability assessment interactive map](#)



**Brownfield Land Register 2021 - BLR-1**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE

*Lichfield*  
district council | N

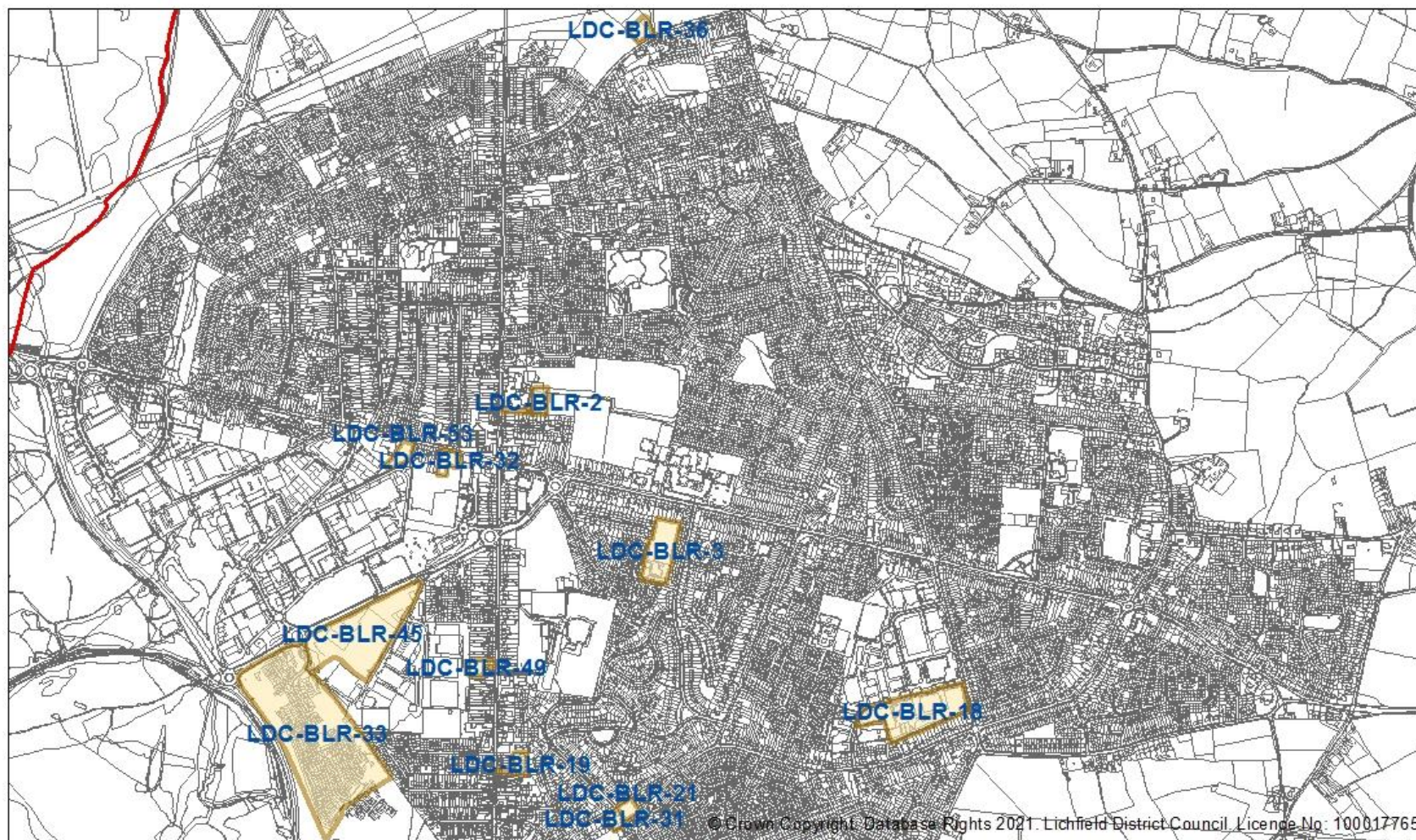


**Brownfield Land Register 2021 - BLR-2**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE



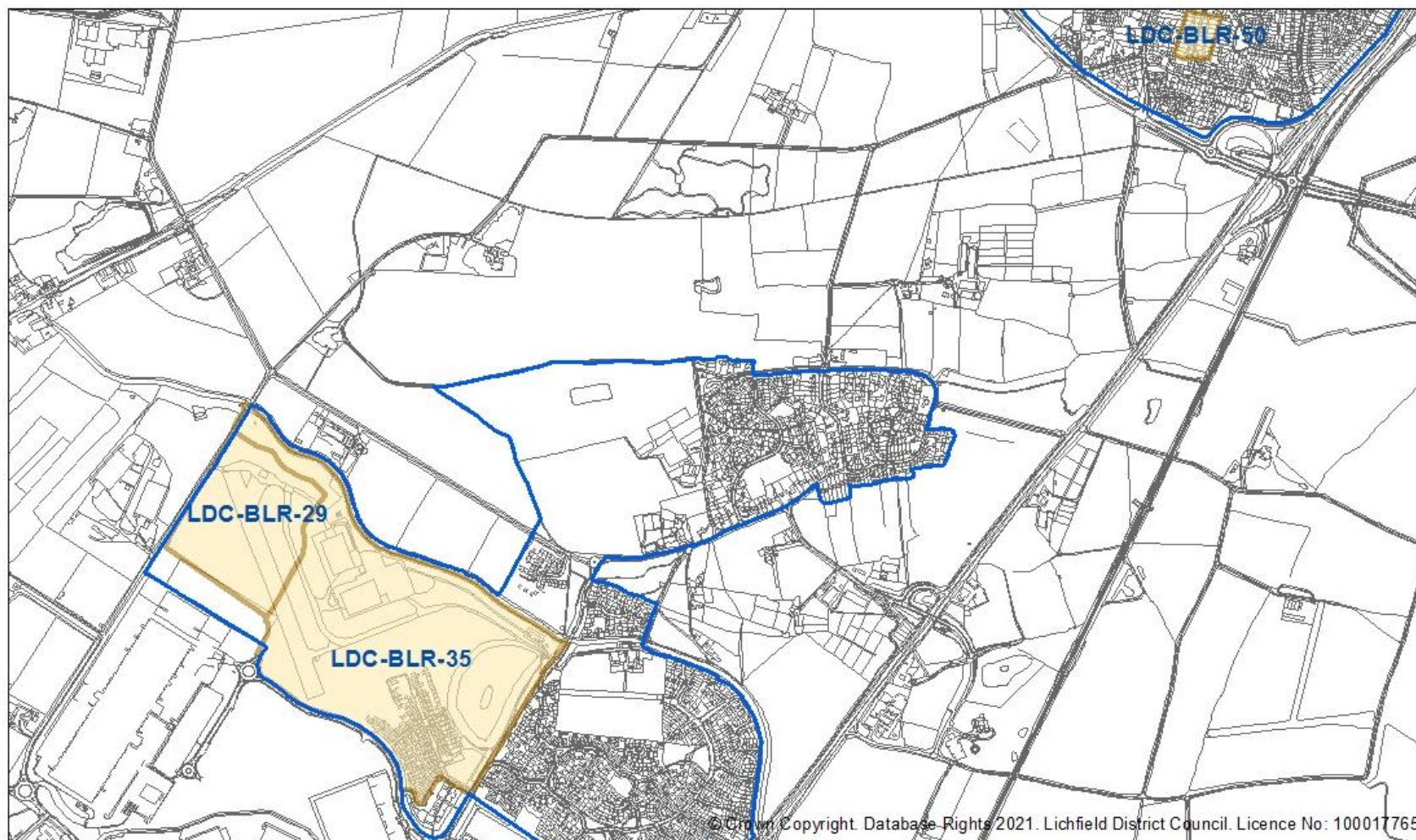


**Brownfield Land Register 2021 - BLR-3**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE



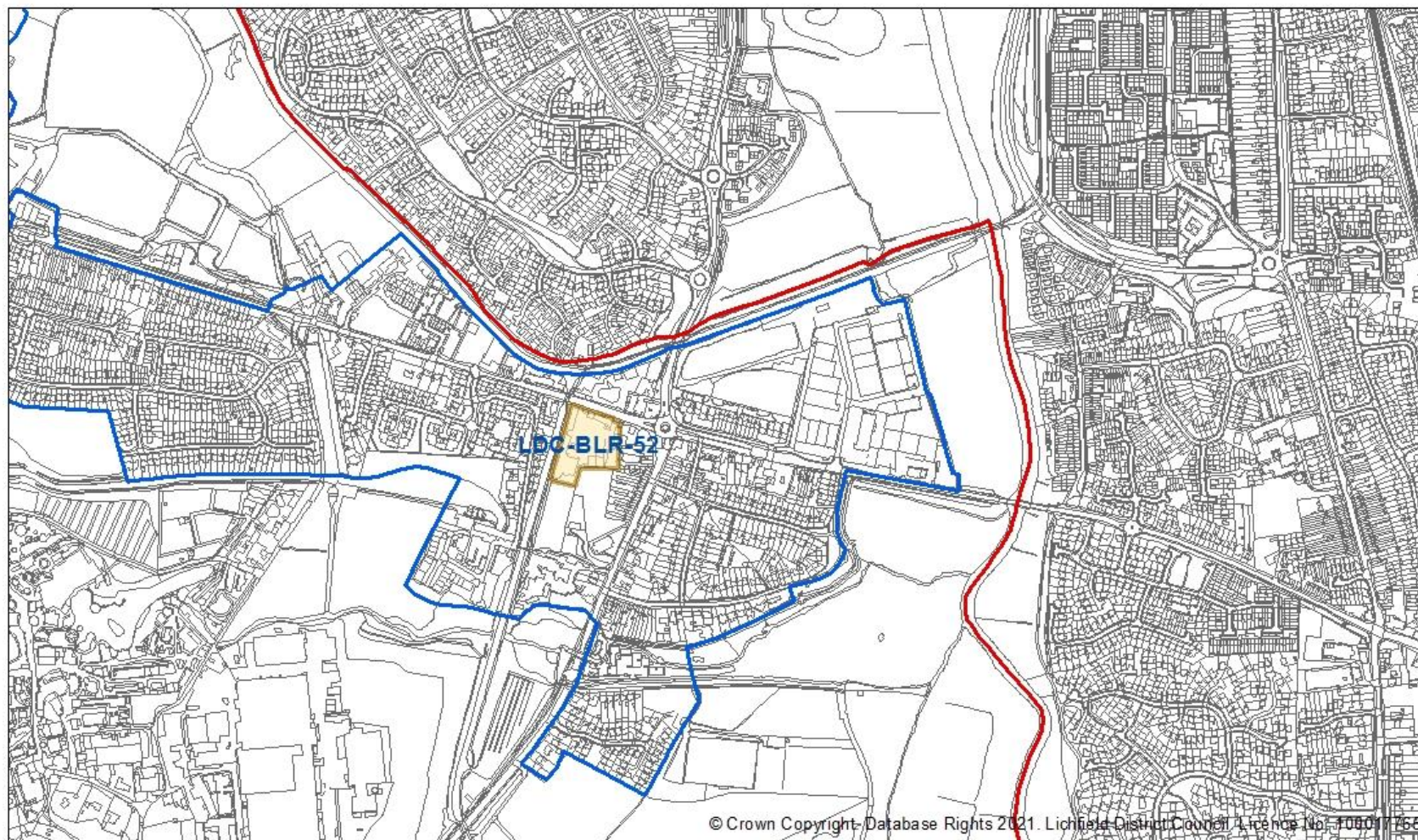


**Brownfield Land Register 2021 - BLR-4**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE



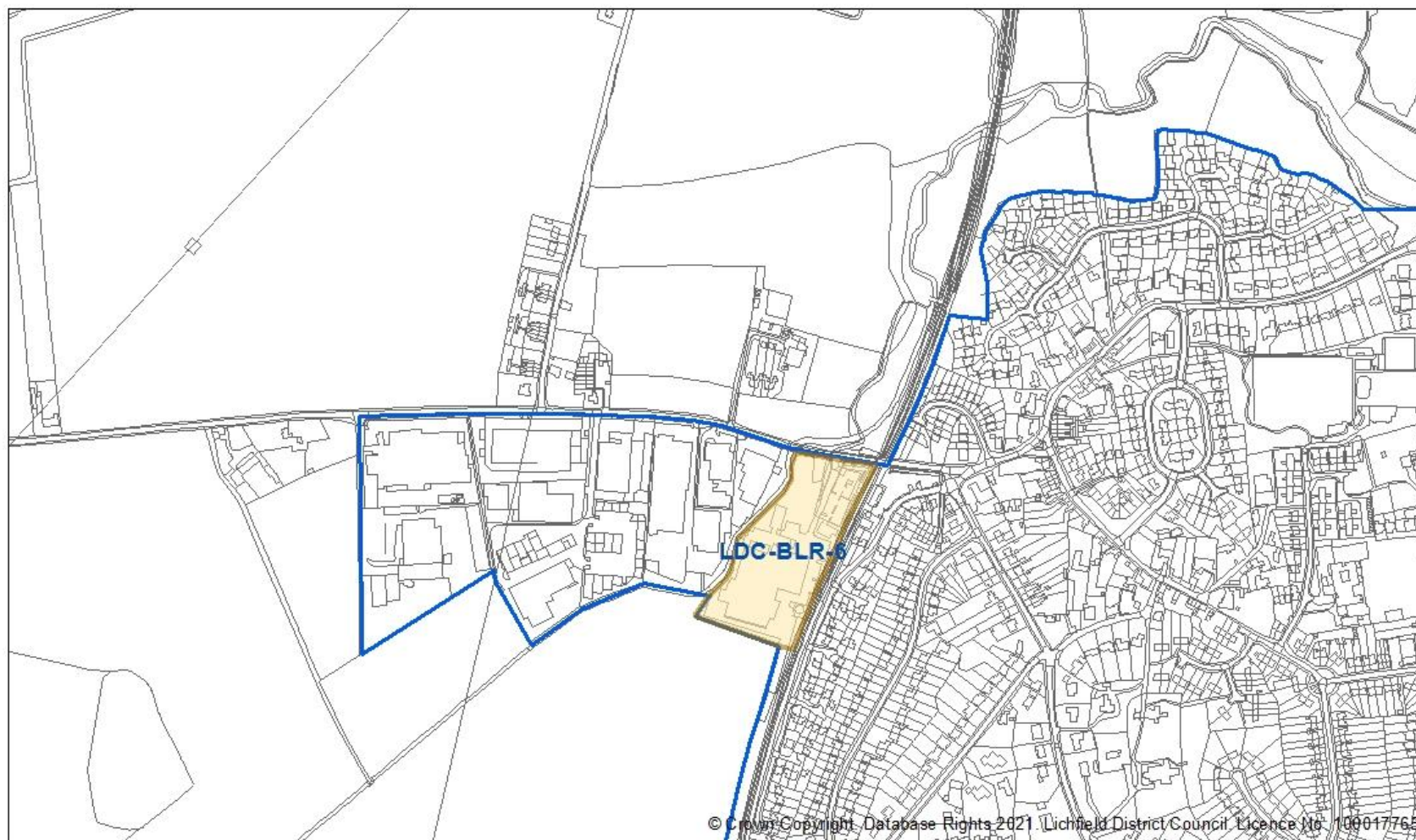


**Brownfield Land Register 2021 - BLR-5**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE



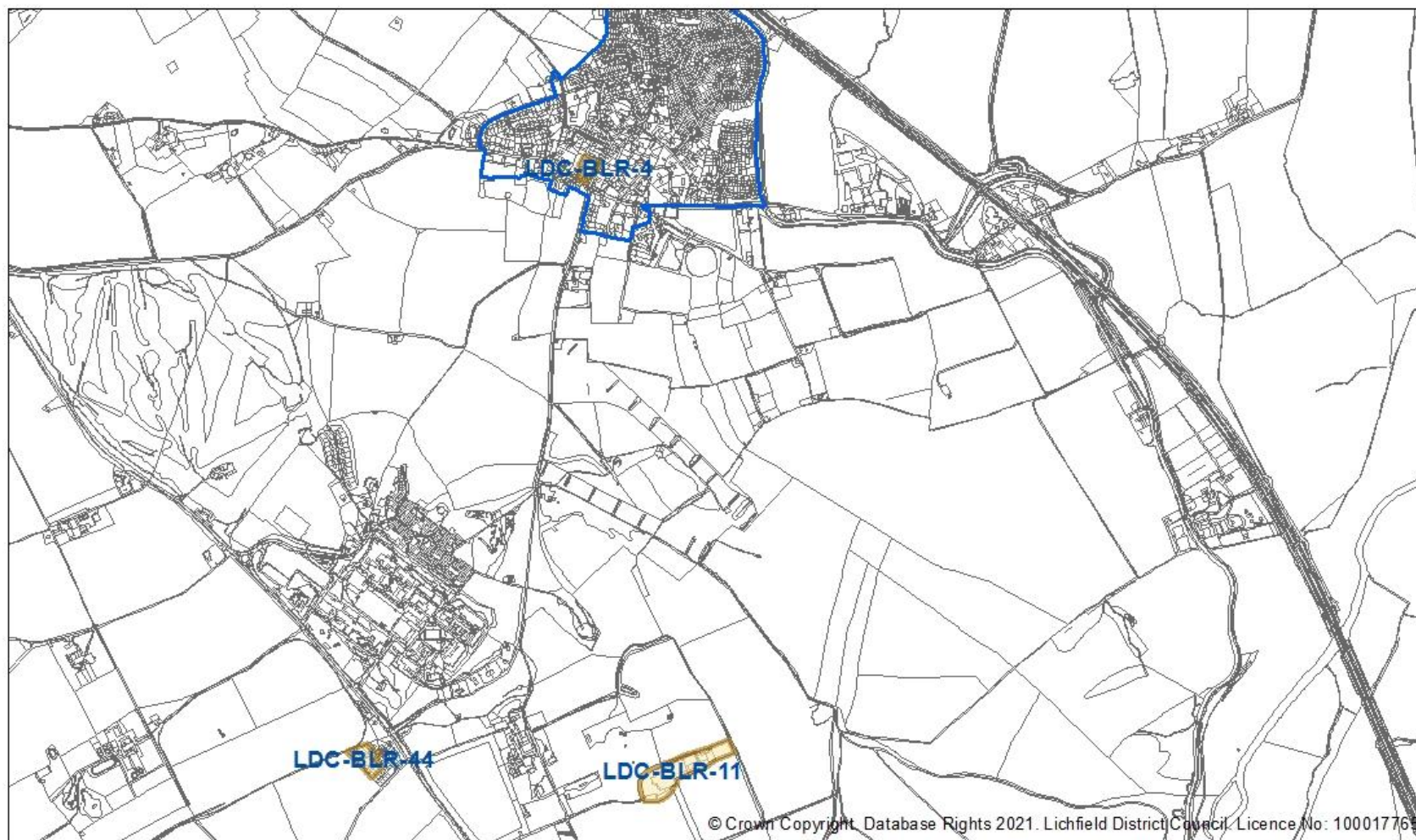


**Brownfield Land Register 2021 - BLR-6**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE

*Lichfield*  
district council | N



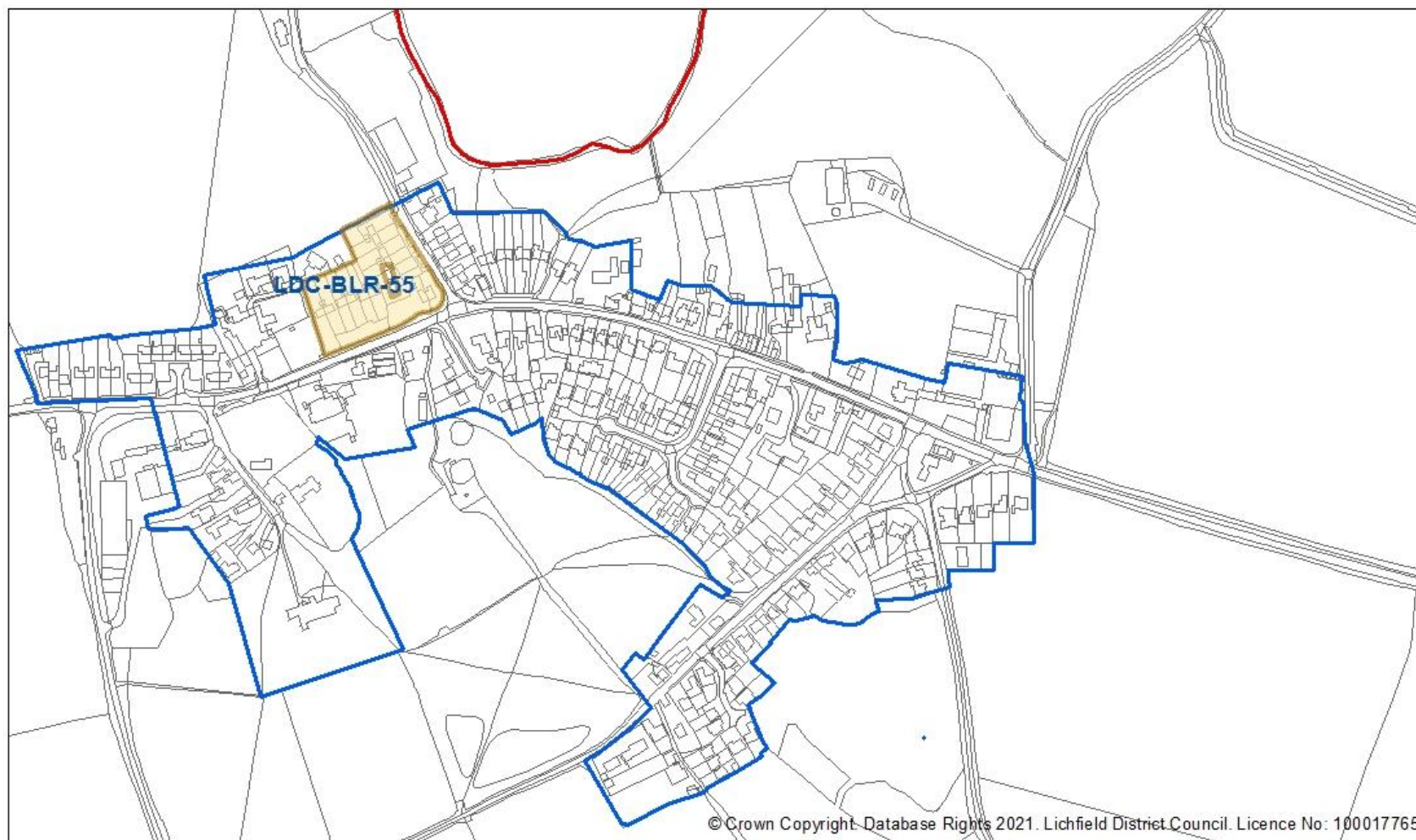
**Brownfield Land Register 2021 - BLR-7**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE





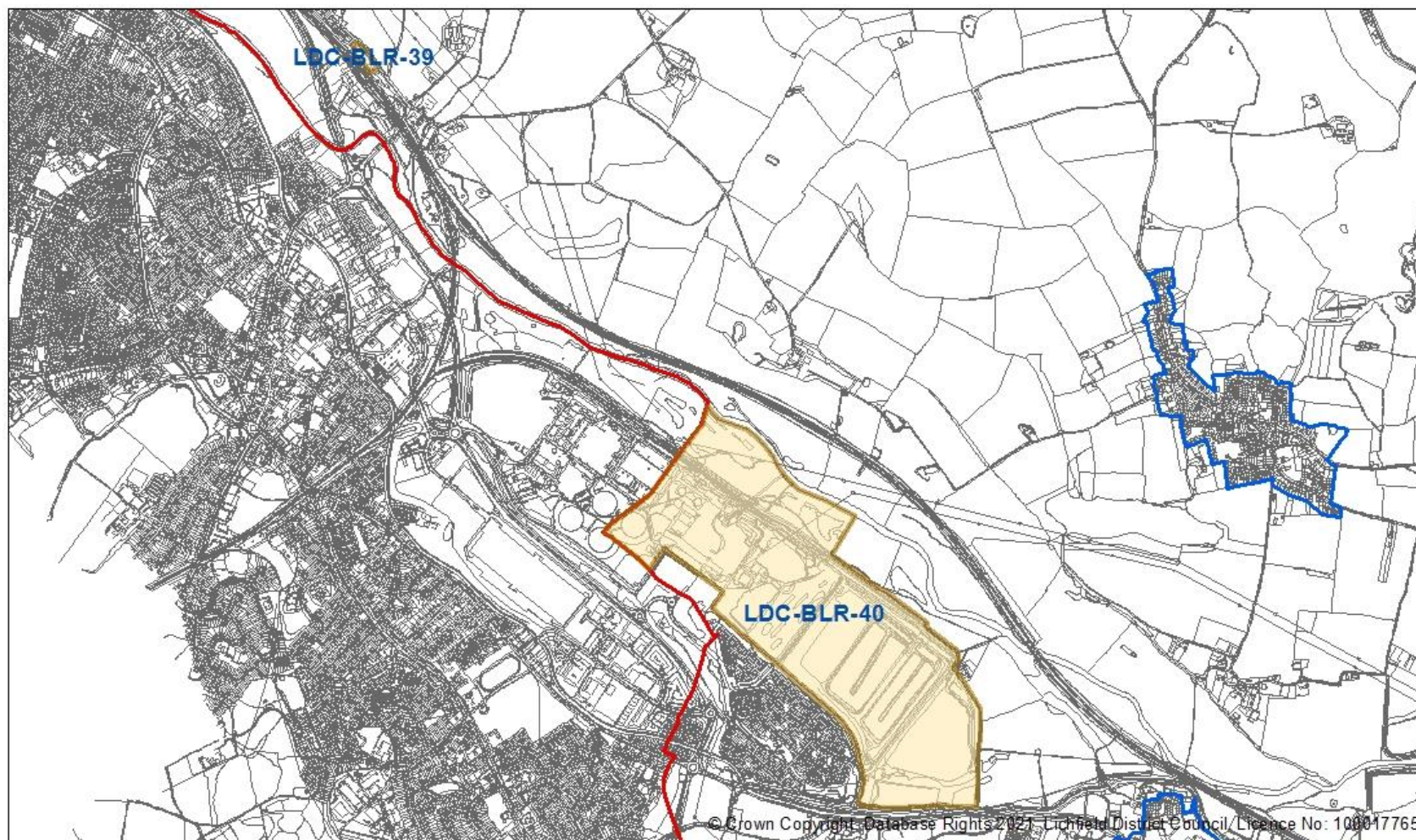


**Brownfield Land Register 2021 - BLR-8**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE





**Brownfield Land Register 2021 - BLR-9**

-  Brownfield Land Register Site
-  Settlement Boundaries
-  Lichfield District Boundary

NOT TO SCALE

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