

# **Black Country Plan**

## **Black Country Employment Area Review (BEAR)**

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July 2021

## Contents

	Page
1.0 Introduction and scope	3
2.0 National Planning Policy and local evidence	4
3.0 Assessing the employment areas	15
4.0 Conclusions and recommendations	32

## Appendices

Appendix 1 – Site assessment proforma

Appendix 2 – Maps of Employment Areas considered in the Study by local authority

Appendix 3 – Employment Area assessments

## **1. Introduction and scope**

- 1.1 The Black Country Employment Area Review (BEAR) Report forms part of the evidence base to support the preparation of the Black Country Plan (BCP). The BCP will contain both strategic and non-strategic policies and will replace both the Black Country Core Strategy (BCCS) adopted in 2011, and significant elements of the suite of tier two Local Plans which flowed from it.
- 1.2 A key objective of the BCP will be to ensure that there is sufficient employment land to meet the job needs of residents and accommodation requirements of businesses over the period of the plan to 2039.
- 1.3 The overall purpose of this Study is to assess the suitability of existing employment land across the Black Country for continued business and industrial use. The Study reviews the stock of existing operational employment land which is already in use, identifies what is suitable to retain and what can be released to other uses, notably housing. The Study is not concerned directly with the identification of currently vacant land for new employment development, this being considered in the Employment Development Needs Assessments (EDNA)(2017 and 2021) and associated Employment Land Supply statement.
- 1.4 For the purposes of this Study, employment land consists of land for factories, warehouses, logistics and other uses that need to locate in industrial areas (trade wholesale, depots, car sales / repair garages, waste management). It does not include shops, offices, and leisure uses, as, while they employ people, they are directed into town and local centres. They are therefore considered a town centre issue.
- 1.5 The Study is made up of four Chapters:
- Chapter two provides a summary of existing national and planning policy.
  - Chapter three sets out the method used in the Study and an assessment of the findings.
  - Chapter four summarises the conclusions of the Study
  - Chapter five contains the key recommends of the Study.
- 1.6 The outputs from this Study together with other evidence base studies, the consultation responses from the Issues and Options consultation 2017 and the Sustainability Appraisal will inform the preparation of the Regulation 18 (Draft Plan) stage of the Black Country Plan.

## **2.0 National Planning Policy and Local Evidence**

2.1 The BEAR has been produced in the context of national policy and local evidence. The purpose of this section is to set out the relevant policy used in the development of the Study.

### **2.2 National Planning Policy**

#### **2.3 National Planning Policy Framework (NPPF)**

2.4 The NPPF was updated in July 2021. Para 8 of the NPPF confirms that the economic objective remains central to achieving sustainable development.

2.5 Para 23 states that strategic policies should provide a clear strategy for bringing forward sufficient land and should be allocating sufficient sites to deliver the strategic priorities of the area.

2.6 Para 31 sets out that all policies should be underpinned by relevant and up-to-date evidence that should take into account the relevant market signals.

2.7 Para 81 requires planning policies to help create the conditions in which businesses can invest, expand and adapt. Para 122 goes on to explain that planning policies should be informed by regular reviews of land allocated for development in plans, and of land availability. Para 123 explains that in areas of high housing demand, local authorities should take a positive approach to applications for the alternative use of currently developed employment land which is not allocated for a specific purpose provided this does not undermine key economic sectors.

#### **2.8 Planning Practise Guidance (PPG)**

2.9 The PPG requires Local Planning Authorities (LPAs) to have a clear understanding of business requirements in their area. Para 040 of the PPG <https://www.gov.uk/guidance/plan-making#evidence-base> explains that the steps in building up this evidence include the need to:

- Understand both existing business needs and likely changes in the market;
- Engage with the business community to understand existing business needs and likely changes in the market.

2.10 Para 041 of the PPG advises that for the purposes of plan-making, this evidence should be used to assess:

- The need for land and floorspace for economic development;
- The existing and future supply of land available for economic development and its suitability to meet identified needs. This should include a reappraisal of the suitability of previously allocated land;
- The likely availability of employment led development, taking account market signals.

2.11 The assessment of land availability to meet a variety of needs is therefore an important step in the preparation of the Local Plan. The NPPF identifies the advantages of carrying out land assessments for economic development in line with housing to ensure sites are allocated for the use which is most appropriate.

2.12 Para 041 does not specifically distinguish between the approach that Plans should take in providing land for new development (ie mainly land which is currently vacant and is needed to accommodate new buildings or changes of use) and policies which protect existing operational employment land already in use, from redevelopment to alternative uses. Plans should therefore consider employment land demand and supply in the round – recognising the role of existing occupied land and premises in accommodating existing businesses and providing opportunities for on-site expansion and investment, and the need for additional land to be brought forward where the existing stock is either qualitatively or quantitatively not fit for purpose.

### **2.13 Local Evidence**

2.14 The BCP is supported by a full review of the existing BCCS and a partial review of the tier two Local Plans prepared by the four Black Country LPAs. This section of the Report provides a summary of these policies and the evidence base which underpins them.

2.15 The BEAR builds on an extensive evidence base in the form of studies prepared to inform the BCCS, subsequent Tier Two Plans and more recent evidence associated with the Black Country Plan itself. This evidence is summarised below.

### **2.16 Black Country Core Strategy policy approach**

2.17 The BCCS was adopted in February 2011 and sets out the vision, objectives and strategy of the four constituent local authorities for the period to 2026. The BCCS identified the main economic challenges in the area arising from high levels of unemployment, skills deficit and a lack of economic dynamism. To address these issues, the vision for the Black Country was set out to establish sustainable communities, achieve environmental transformation via a step change in the image and environmental quality of the area, and deliver economic prosperity by attracting

new employment opportunities and improving the wealth and image of the Black Country.

- 2.18 The employment land strategy sought to ensure that a sufficient stock of employment land was available to meet demand and support the growth and diversification of the economy. The strategy acknowledged that while overall manufacturing employment was forecast to fall, the Black Country was well-placed to attract knowledge based, high technology manufacturing sectors and warehousing development. The overall stock of employment land was therefore planned to decrease, but with an increase in high-quality employment land and industries, leading to the proposed creation of 75,000 jobs in these sectors. This strategy approach therefore planned for the release of low quality employment land and for its redevelopment for residential purposes, but also for a reconfiguration and expansion of employment land for growth in high quality industries, including green industries, aerospace, food production, off-site construction and health products.
- 2.19 The overall employment land requirement is provided by Policy EMP1. The Policy uses a total stock approach – ie how much land needs to be occupied and in use for employment activity to meet forecast levels of employment. This ‘stock’ approach is unusual as most development plans seek to quantify additional employment land needs to meet forecast growth only. Policy EMP1 sets out requirement of 2,754ha of operational employment land in the Black Country by 2026, a contraction from 3,586ha in 2009.
- 2.20 Policy EMP1 recognises that the release of employment land for housing needs to be controlled so as to ensure that the employment land stock does not become too low or not enough land is developed / redeveloped for employment, so as to ensure that economic development is not constrained and the Black Country provides enough jobs. The control is essentially through the application of BCCS Policy DEL2. Policy DEL2 states that “before releasing any employment land in the Black Country we will first ensure the retention of an adequate supply of occupied and available employment land to meet defined needs...we will take into account the availability of employment land within the area, the quality of the site and its geographic market”. The policy expected that some current or former employment areas would be identified for redevelopment for housing in the key diagram or subsidiary local plans, but for employment areas elsewhere it identifies a set of criteria to help assess the suitability of releasing an employment site for housing.
- 2.21 In terms of specific types of employment land, there was a realisation that the existing portfolio was not sufficient to meet aspirations. This is with particular regard to employment areas which are highly accessible, provide a high-quality environment and are exemplified by clusters of high technology knowledge-based sectors, termed Strategic High-Quality Employment Areas (SHQEA). BCCS Policy

EMP2 (Actual and Potential Strategic High-Quality Employment Land) is relevant on this issue, in seeking to safeguard SHQEA for suitable employment uses.

2.22 Policies EMP2 sets out the criteria that were used to define Strategic High-Quality Employment Areas. Policy EMP2 areas are characterised by excellent accessibility, high quality environment and clusters of high technology based on the following criteria:

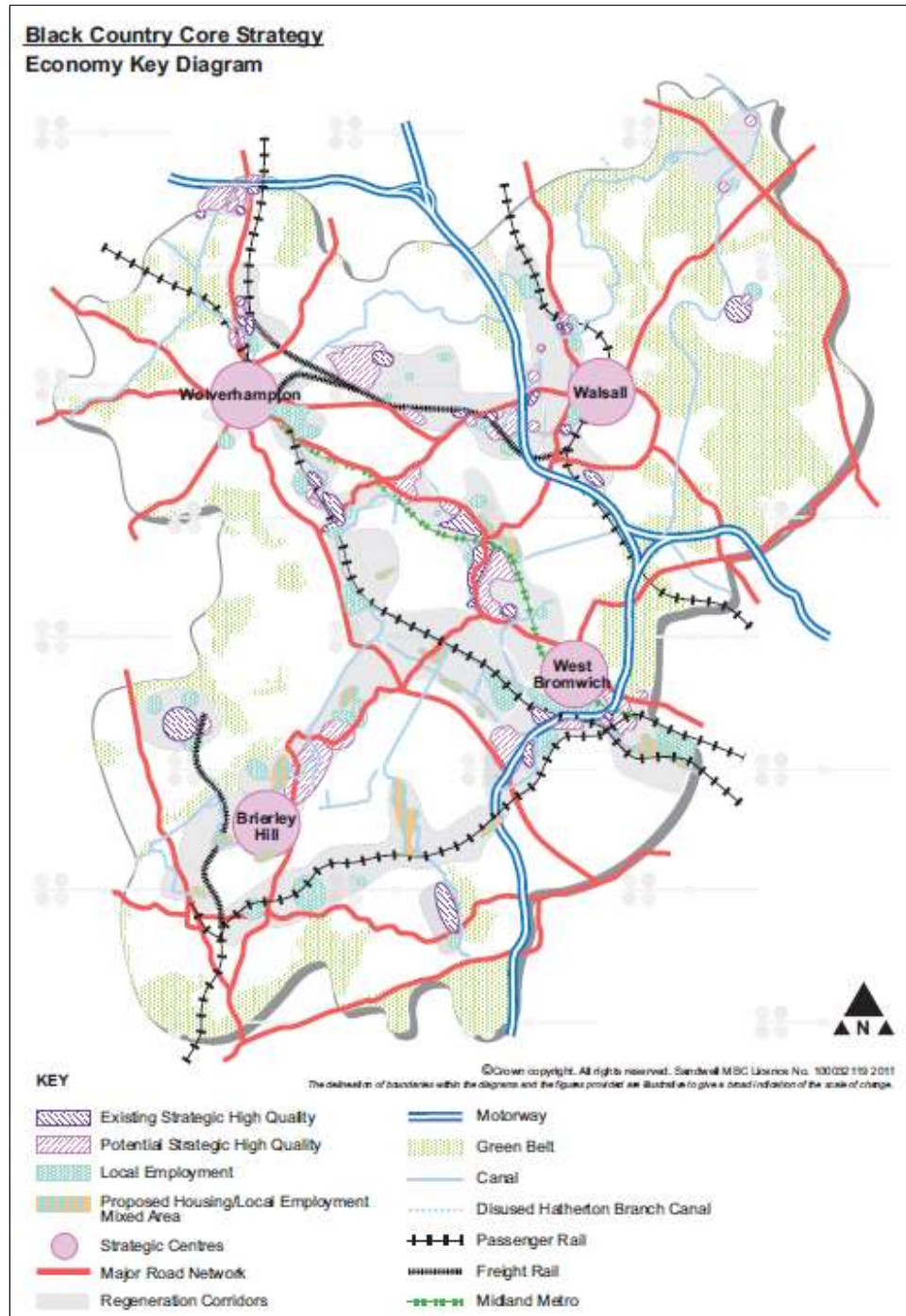
- Well-located near to a large skilled workforce;
- Well-located to the motorway network to provide good accessibility to international, national and regional markets and supply chains;
- Has good public transport accessibility;
- Has a critical mass of active industrial and logistics land and premises that are well suited to the needs of modern industry;
- Good proximity to an existing or proposed knowledge cluster;
- High existing or potential environmental quality including high quality greenspace, good quality built environment and linkages to walking and cycling routes; and
- Attractive or potentially attractive to national or international investment

2.23 The EMP2 areas satisfy most of these characteristics, and also those areas considered capable of meeting them with a programme of interventions - identified as Potential Strategic High Quality Employment Areas). But to attract high-quality development and occupiers it is not always necessary for an area / site to display all the characteristics listed. For example, in the Pensnett area of Dudley and parts of Aldridge in Walsall the market has delivered high-quality investment, despite the sites being some distance from the strategic highway network.

2.24 The planned growth in SHQEA was to be achieved through a combination of firstly the development of land not currently in employment use (around 285ha) and secondly through the improvement / redevelopment and reconfiguration of other employment areas (around 800ha) so that the Black Country can meet its overall planned reduced targets for employment land. These areas are specifically identified as Local Quality Employment Areas (LQEA) and are characterised as providing “a valuable source of low cost accommodation which is vital in providing for local employment and a balanced portfolio of different sizes and quality of sites”.

2.25 The extent of Strategic High Quality Employment Land is shown on Map 1 below.

**Map 1 – BCCS Employment key diagram**





2.26 Policy EMP3 areas are characterised by a critical mass of industrial, warehousing and service activity in fit for purpose accommodation with good access to local markets and employees. These areas are defined by the following criteria:

- A critical mass of active industrial and service uses and premises that are fit for purpose;
- Good access to local markets, suppliers and employees;
- The existing or potential use and/or the traffic generated by the use does not have an unacceptable impact on the amenity of surrounding land uses or on the highway network; and,
- Good public transport accessibility. The extent of the EMP3 areas is shown on Map 1 above.

2.27 Policies EMP2 and EMP3 set out the range of uses that are considered appropriate within them. EMP2 areas are safeguarded for manufacturing and logistics activity within Use Classes B1, B2 and B8, plus some non-class B uses where they can be shown to support, maintain or enhance the business and employment function of the area. Policy EMP2 also emphasises the need to bring forward high quality development in these areas and discourages development that would prejudice quality, dilute employment uses or deter investment. The approach in EMP3 areas is more flexible, with support for those uses listed in Policy EMP2, but also:

- Motor trade, including car showrooms, garages and vehicle repair
- Haulage and transfer depots
- Trade wholesale retailing and builders merchants
- Scrap metal, timber, construction premises and yards
- Waste collection, transfer and recycling uses as set out in Policy WM4

2.28 Appendix 2 of the Core Strategy identified, in a diagrammatic manner, the extent of the Policy EMP2 and EMP3 areas, and those areas of employment land that should be considered for redevelopment for other uses, mainly housing.

### **2.29 Black Country Core Strategy evidence base**

2.30 The evidential basis for this policy approach was set out in the 2009 Assessment of Employment Sites Report and the 2008 Black Country Employment Land review prepared by GVA Grimley, the latter a refinement and update of the Employment Land Capacity Study undertaken by GVA Grimley and GHK in 2005. These studies helped to establish the economic vision for the Black Country and translated it into a set of employment forecasts, which in turn were used to establish demand for land. The recommendations of the 2009 Study informed the criteria used to define the Strategic High-Quality Employment Areas and Local-Quality employment areas. The Report also provided a site by site assessment of the quality of Black Country

employment areas and recommended which category of land they should be allocated to.

### **2.31 Black Country Local Plans and associated evidence**

2.32 To support the delivery of the BCCS, the four Black Country Councils have progressed a suite of Tier 2 plans in the form of Site Allocation Documents (SADs), Area Action Plans (AAPs) and Neighbourhood Plans. These plans were tasked with defining the detailed boundaries of the Policy EMP2 and EMP3 areas, identifying new employment development sites – mainly through the bringing forward of vacant land, and those poorer quality employment sites that could be redeveloped for alternative uses. These Tier 2 plans have been successful in defining the detailed boundaries of the vast majority of the Black Country’s employment land and identified a limited number of additional areas that were ‘missed’ from the 2008 GVA Grimley Study. The main exception to the Tier 2 Plan coverage is in Wolverhampton, where the Council produced a series of Area Action Plans (AAPs) focussed on the City’s strategic regeneration areas. The Wednesfield employment area on the eastern side of the City was not included, and nor were a number of smaller ‘free standing’ employment areas mainly on the western side of the City.

2.33 To support the Tier 2 plans the local authorities prepared further employment land evidence to supplement the work undertaken for the BCCS. This was prepared either in-house or through the use of consultancy support and included:

- Walsall Employment Land Review (March 2016 and updated April 2017). This Study provided the detailed justification for the identification of Strategic High Quality Employment Land and Local Employment Land for inclusion in the Walsall Site Allocation Document (SAD), adopted in 2019.
- Dudley Strategic Employment Land Review (2016). This Study provided the basis for the allocation of Strategic and Local Employment Areas to be included in the Dudley Development Strategy Development Plan Document adopted by the Council in 2017. The SELR also set out the means by which additional Strategic High Quality Employment Land could be delivered to contribute towards meeting the relevant BCCS target figure.
- Wolverhampton Land Interests Study (2012). This Study involved engagement with occupiers and landowners within the City’s employment areas for the purposes of the suite of Area Action Plans (AAPs), adopted 2014-16.
- Sandwell Employment Sites Identification Study (2011). This Study sought to identify development opportunities for the purposes of inclusion in the Sandwell Site Allocations Development Plan Document (SADPD). The focus of the work was on new development opportunities rather than existing employment areas, but it did involve an assessment of the existing occupied stock in order to understand its availability for redevelopment. The detailed identification of

Strategic High Quality Employment Land and Local Employment Land in the SADPD was based mainly on the 2008 GVA Grimley Study, supplemented by additional fieldwork.

2.34 In summary, while these studies adopted a consistent approach to defining employment areas compliance with the EMP2 and EMP3 definitions, they were undertaken over an extended period of time (2011-17) and are in need of updating to provide a consistent and comprehensive evidence base to inform the Black Country Plan.

### **2.35 The Black Country Plan and associated evidence**

2.36 The BCP will replace the BCCS and have a lifespan to 2039. Unlike the BCCS, the BCP will also contain site allocations to meet identified needs. This study provides evidence to support any review of the boundaries of the existing employment areas which are currently defined in tier two Local Plans that the BCP may need to make. It also reviews site allocations of land which is currently in employment use but identified for alternative uses, mainly housing.

2.37 The Black Country Plan preparation process commenced in 2016 and the Issues and Options consultation report was published in September 2017.

2.38 The Black Country Economic Development Needs Assessment (EDNA) was completed by WECD consultants in May 2017 as a key piece of work to inform the initial stages of the preparation of the Black Country Plan. It was published alongside the Issues and Options Report in September 2017. This work was further updated in 2021, the focus of this update being to review the employment land requirement, and to identify additional sources of land supply to meet identified needs.

2.39 The principle aim of the EDNA was to provide an NPPF / NPPG compliant objective assessment of industrial land needs for the Black Country drawing upon an independent assessment of the area's economic development needs.

2.40 The EDNA developed a picture of the spatial characteristics and economy in the Black Country and the trajectory they may follow over the coming years. It translated these into land requirements and compared this future requirement with the available supply of employment land in the Black Country. The EDNA also provided a commentary on the effectiveness of the employment policies in the adopted BCCS including EMP1, EMP2 and EMP3 as referenced above.

2.41 In summary, the EDNA found that the Black Country has a fast-growing functional economy and has the capacity to deliver significant growth that will make a substantial contribution to the sub-regional economy and national wealth. Going forward, as stated in the Strategic Economic Plan, the intention is to go further and

faster with a focus on High Value Manufacturing but recognising interdependencies with other sectors including financial and business services and supply chain activity. Enquiries for future space are dominated by logistics and manufacturing related interest, which require more prestigious sites, high quality space with easy access to transport hubs and connectivity.

- 2.42 The EDNA advises that the Plan should provide for between 502-522ha of land to meet forecast demand. The EDNA also recommends that any existing employment land planned to be 'lost' to non-employment uses should be re-provided. Planning permissions and Local Plan allocations provide some 205ha of employment land, a gap of some 300ha against forecast demand. The Plan will provide for these requirements through the identification of currently vacant sites for development, and the intensification of underused employment areas. Some demand will be required to be accommodated outside of the Black Country and secured through the Duty to Cooperate process.
- 2.43 In qualitative terms, the EDNA emphasises the need to accommodate the growth and needs of a range of sectors with a mixed portfolio of sites including smaller and larger sites (including of higher and lower specification). It is therefore imperative to both protect the existing supply of industrial land, to facilitate investment and improvement of existing improvement areas (including bringing forward the recycling of sites to provide more modern accommodation) and to identify new opportunities to address the significant gap (undersupply) of land to meet anticipated levels of demand. In the context of this overall picture, the EDNA recognises that there may be some pockets of poor-quality land which may be in active employment use at present but is unlikely to remain so in the future and could be considered for alternative uses.
- 2.44 In terms of the existing BCCS, the EDNA recognises that the distinction between Strategic High-Quality Employment Areas (Policy EMP2) and Local Quality Employment Areas (Policy EMP3) has provided a very useful way to guide and coordinate planning and development control by the local planning authorities. Para 8.7 of the EDNA recommends that retaining the Policy EMP3 approach will continue to give greater prominence to high quality export led advanced manufacturing, and Policy EMP3 should continue to focus these activities into particular areas so as not to compromise the quality of the Strategic High-Quality Employment Areas. In this context, the EDNA goes on to suggest that the terminology used in the Policies should be reviewed in order to be more recognisable to the market.
- 2.45 The EDNA also provides an assessment of both land available to meet future needs, and also a number of existing poorer quality employment areas that may no longer be attractive to the market and could be developed for alternative uses, specifically housing. The 2017 Issues and Options consultation sought views on the effectiveness of the existing BCCS policies, and the implications of new evidence

including the EDNA. In summary, the key issues highlighted in responses to the consultation were:

- General agreement that the Plan should support additional economic growth but differing views on how much additional land is needed given economic uncertainty over such a long period.
- Acceptance that the Plan should continue to allow active employment sites to remain but poorer quality sites no longer needed for industry could be redeveloped for alternative uses such as housing.
- The Core Strategy should continue to distinguish between Strategic High-Quality Employment Areas and Local employment areas with appropriate uses in each.

#### **2.46 Summary - National Planning Policy and Local Evidence**

- The NPPF and NPPG require that planning policies should be informed by regular reviews of land allocated for development in development plans and of land availability. Plans should recognise the role of existing occupied employment land and premises in supporting economic growth, and the operational requirements of landowners is recognised as a key consideration in understanding development potential. Land which is needed to support key economic sectors should be retained for employment uses.
- The most recent comprehensive review of employment land across the Black Country was completed in 2008 to inform the BCCS. This work provided the starting point for the suite of Tier 2 plans which identified detailed boundaries for the vast majority of the Black Country's employment areas.
- The BCCS and Tier 2 plans distinguish between Strategic High-Quality Employment Areas and Local Quality Employment Areas. Across the Black Country, these Plans proposed a significant increase in the quantum of Strategic High-Quality Employment land and a reduction in Local Employment Land. The overall effect of this approach would be a net reduction in employment land in recognition of a forecast contraction in levels of employment in some traditional 'land-hungry' manufacturing sectors.
- The EDNA prepared to support the BCP advises that policies should plan for a net increase in employment land and that the existing supply of land should be protected. There may be some limited instances where sites are no longer attractive to the commercial property market and should be considered for alternative uses, specifically housing. The existing approach of distinguishing between Strategic High-Quality Employment Land and Local Quality Employment Land should be carried forward into the Black Country Plan.

- For the purposes of preparing the Black Country Plan, the existing evidence base related to employment areas is now dated and partial in nature. This BEAR will address this evidence gap.

### **3. The BEAR: Assessing the Employment Areas**

#### **3.1 Method**

3.2 There were five main stages to the assessment process:

1. Identification of the areas to be considered in the assessment;
2. Assessment of the employment areas identified;
3. Analysis of the results;
4. Identification of the areas:
  - a) of greatest strategic importance;
  - b) of local importance;
  - c) low scoring areas for assessment for alternative uses
5. Moderation of the results

#### **3.3 Stage 1 - Identification of the areas to be assessed**

3.4 The first stage was to identify the employment areas that were to be assessed through the BEAR and was undertaken by a combination of desk top work and fieldwork. The initial work was focussed on reviewing the original Black Country Employment Areas (as identified in the 2009 GVA Grimley Study) against the more recent evidence collected to support Tier Two plans. The final stage was to identify new areas either missed from the original study / Tier two plans or new sites that have established. This means that there are three main sources to identify the employment areas assessed in the Study:

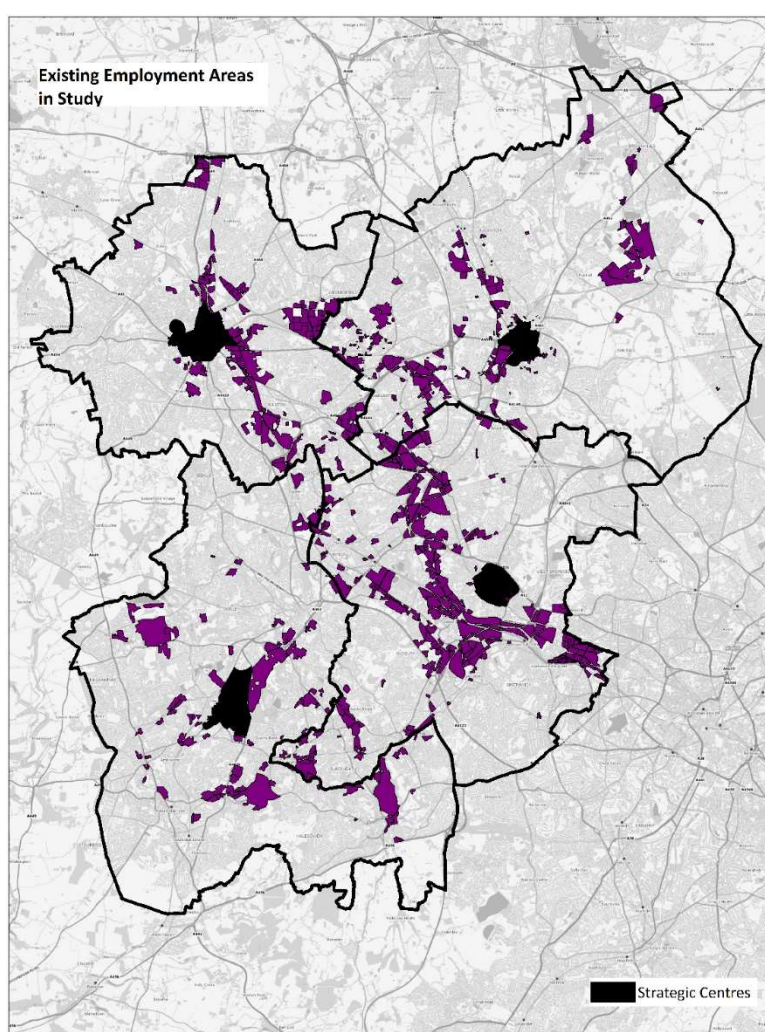
1. Areas identified in the 2009 GVA Study
2. Areas allocated as employment areas in subsequent Tier two plans
3. New sites identified through fieldwork and desk-top work.

3.5 The size threshold for sites and areas to be included in the Study was 0.4ha. Some smaller sites were included in the study where they were shown in historic data or formed a sub-division of a larger area. Land within the four Strategic Centres was excluded from the results of the Study. This is because land-use designations within them will be reviewed through the preparation of Area Action Plans (AAPs). In any event, the quantum of employment land within the Strategic Centres is very limited to 63ha as set out below:

- Brierley Hill – 39ha
- Walsall – 22ha
- West Bromwich – 2ha
- Wolverhampton – 0ha

- 3.6 Each of the employment areas identified in (1) and (2) above was reviewed to ensure the boundaries remained appropriate and, where required, amended to reflect changes that have occurred over time. Such changes included the expansion / addition of business units and the erosion of others due to the loss of premises through redevelopment or change of use. New employment areas (3) were identified using a combination of looking at planning permission boundaries for business and industry, aerial photographs and site visits to identify any areas that were in industrial use. A boundary was then captured and mapped.
- 3.7 The extent of the employment areas identified in Stage 1 is shown on Map 2. A detailed map covering the whole Black Country is included as Appendix 2.

### Map 2 – in scope Employment Areas



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- 3.8 A total of 680 employment areas were identified, occupying 3,031 ha of land. A breakdown by local authority is set out in Table 1 below.



**Table 1 – extent of employment areas included in the BEAR**

Local authority	Number of Employment areas	Coverage (ha)
Dudley	101	661
Sandwell	257	1,136
Walsall	213	640
Wolverhampton	110	594
<b>Total</b>	<b>681</b>	<b>3,032</b>

Source: Black Country local authorities

3.9 This shows that over one third of land employment areas are located in Sandwell, with the remaining two thirds distributed broadly equally between Dudley, Walsall and Wolverhampton.

### 3.10 Stage 2 - Assessment of the employment areas

3.11 The scoring criteria used to assess the employment areas was developed from three main sources. The starting point for the assessment were the criteria used in the 2009 GVA Grimley Study, These were then refined to reflect the experience of the range of studies used to inform the Tier 2 plans and finally having regard to the site assessment criteria used in the EDNA.

3.12 The final set of criteria used in the BEAR are summarised below, with the detailed criteria and proforma attached as Appendix 1:

#### 1. Environmental criteria

This refers to both the area immediately surrounding the site / area (external environment), and the internal characteristics:

- A. Building quality and suitability for employment uses.
- B. General external environment.
- C. Levels of visible voids.

Internal site arrangement, building quality and potential conflict with neighbouring uses are important considerations when determining the suitability of a site for the efficient operation of modern business needs. Employment areas with internal layouts with ample circulation space, occupied by modern and well-maintained buildings in an attractive surrounding environment were more preferable to older stock in locations with sensitive adjacent uses such as housing. Criteria A, B and C formed part of the GVA assessment.

## 2. Visibility and profile criteria

These criteria relate to the characteristics of existing occupiers and the likely attractiveness of the site/area to a range of business requirements:

- D. Nature of existing tenants.
- E. Market attractiveness.

It is recognised that these criteria involve a degree of subjectivity, but the 2008 Study involved a simple approach based on defining sites as either being able to attract businesses outside the local area, or being able to attract companies who would consider locations across the Black Country and beyond. This to be based on known characteristics such as accessibility and profile. Criteria D and E formed part of the GVA assessment.

## 3. Accessibility criteria

Good accessibility is a key requirement for modern business needs, particularly in relation to the movement of materials and finished products, but also the ease by which employees can get to work:

- F. Strategic accessibility to the motorway network.
- G. Local car, commercial and HGV access.
- H. Public transport accessibility.

There are complex trading networks across the Black Country (for instance in the automotive sector) and so internal links and local access are important considerations. However, both the 2008 Study and EDNA highlighted the importance of access to the motorway network and therefore national and international markets for finished products. Public transport is also key, and in choosing site locations this should be a major consideration, but with the caveat of having first determined areas of search through accessibility to the road network. Criteria F was a key element of the GVA assessment. The BEAR uses a slightly more flexible approach having regard to access to the motorway network but also to a dual carriageway with direct motorway access. This reflects comments made to the Issues and Options consultation. Criteria G and H were combined in the GVA assessment, but it is considered that public transport accessibility and local vehicular accessibility are important in their own right and should be assessed separately.

## 4. Proximity to knowledge clusters, key businesses or major regeneration initiatives criteria

Businesses will be attracted, to some degree, by proximity to clusters of leading-edge companies, some as 'feeder' businesses. The criteria used to test these characteristics were:

- I. Critical mass of employment activity, defined as a large area with a single employer or a cluster of a number of occupiers containing significant numbers of jobs.
  - J. Proximity of non-industrial adjoining uses that could restrict industrial activity on site.
  - K. Proximity of growth sector businesses as defined by the Black Country Local Enterprise Partnership (LEP).
- 3.13 Criteria I and K were not used in the GVA assessment but are criteria used to define Strategic High-Quality Employment Land and Local-Quality Employment Land. Criteria I relates to the intensity of activity having regard to the numbers of jobs and businesses while Criterion J has been introduced into the BEAR reflecting the degree to which neighbouring uses can constrain the operation of a range of modern manufacturing and logistics activities. Criterion K seeks to understand the extent to which the area accommodates key growth sector businesses who are important to the Black Country economy both in their own right or as part of a cluster of such businesses.
- 3.14 A detailed proforma (attached as Appendix 1) was developed to quantify the performance of the surveyed employment areas against each of the A-K criteria. This was used to develop both an aggregate score and a score against each of the five groups of criteria.
- 3.15 The results of this stage of the assessment for all Employment Areas are attached as Appendix 3.
- 3.16 Stage 3 – Analysis of the results**
- 3.17 The results of the assessment are set out in Table 2 below:

**Table 2 – assessment criteria**

Characteristics	Criteria	Maximum score	Average score
Environmental criteria	A. Building quality and suitability for employment uses.	4	2.8
	B. General external environment.	5	2.8
	C. Levels of visible voids.	5	4.0
<b>Environmental criteria overall</b>		<b>14</b>	<b>9.6</b>
Visibility and profile criteria	D. Nature of existing tenants.	5	2.4
	E. Market attractiveness.	3	1.7

<b>Visibility and profile overall</b>		<b>8</b>	<b>4.1</b>
Accessibility	F. Strategic accessibility to the motorway network.	5	3.8
	G. Local car, commercial and HGV access.	4	3.0
	H. Public transport accessibility.	2	1.3
<b>Accessibility overall</b>		<b>11</b>	<b>8.1</b>
Proximity to knowledge clusters, key businesses or major regeneration initiatives criteria	I. Critical mass of employment activity.	3	2.0
	J. Proximity of non-industrial adjoining uses that could restrict industrial activity on site.	0	-1.5
	K. Proximity of growth sector businesses as defined by the Black Country Local Enterprise Partnership (LEP).	4	1.4
<b>Proximity to knowledge clusters, key businesses or major regeneration initiatives criteria overall.</b>		<b>7</b>	<b>1.9</b>
<b>Total</b>		<b>41.0</b>	<b>23.6</b>

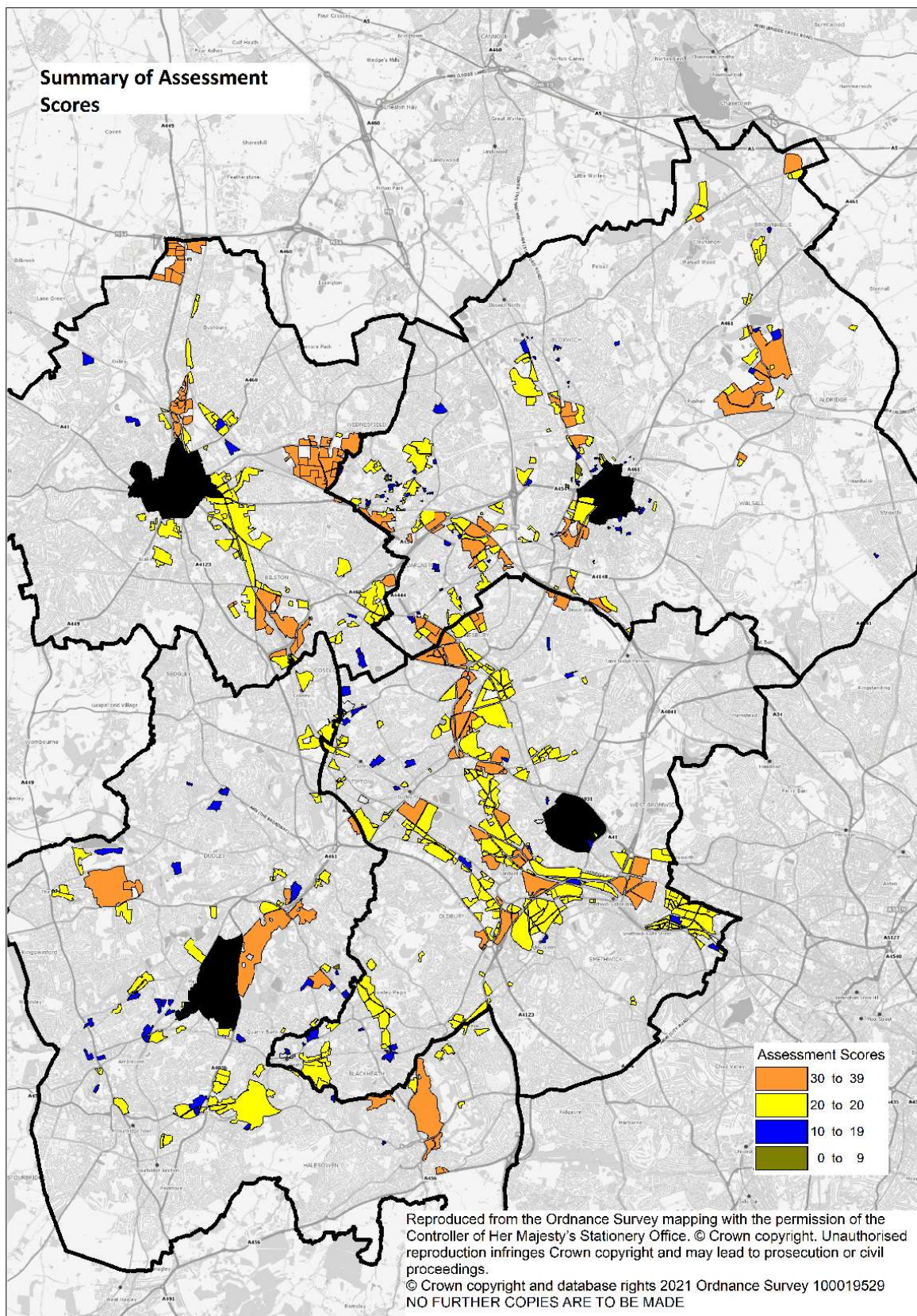
3.18 Table 2 shows that the maximum overall score was 41, with an average score of 23.6. The breakdown of the scores is shown on Table 3 and Map 3 below.

**Table 3 – summary of assessments**

Score	Number of areas	Area (ha)
30-39+	123	1145.4
20-29	384	1662.6
10-19	151	193.2
0-9	22	29.7

3.19 Table 3 shows that there were few very low-scoring employment areas, with less than 100ha of land scoring less than 10. The majority of sites and areas scored between 20-29, making up 1663ha, or 55% of the total stock of land. The highest scoring areas, with a score of 30 or more (73% of the maximum score), made up 38% of the total stock. These areas are the very best quality employment areas in the Black Country, performing well against most criteria.

### Map 3 – Assessment scores



### 3.20 Stage 4 - Identification of the areas

#### 3.21 Stage 4a – Strategic Employment Areas

3.22 As set out in para 2.44 above, the 2017 EDNA recommended that the Black Country Plan should maintain the distinction between Strategic High-Quality Employment Land and Local Employment Land. Retaining this approach will continue to give greater prominence to high quality export led advanced manufacturing and key logistics sectors, and provide for the needs of local and non-manufacturing and logistics uses in locations so as not to compromise the quality of the Strategic High-Quality Employment Areas. The EDNA recommended that in broad terms the criteria used to distinguish the Strategic High-Quality Employment Areas were appropriate, but the terminology used in the Policies should be reviewed in order to be more recognisable to the market.

3.23 In the light of the EDNA recommendations, the Strategic Employment Areas should continue to be safeguarded for primarily for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii), B2 and B8. In addition, some ancillary employment-generating non-Class E(g)(ii), E(g)(iii), and Class-B2 and B8 uses, such as childcare facilities and small-scale food and drink outlets, may also be permitted in Strategic Employment Areas where they can be shown to strongly support, maintain or enhance the business and employment function and attractiveness of the area, and meet sequential and other national or local policy tests could be appropriate.

3.24 The criteria to be used to identify Strategic High Quality Employment Areas (as set out in BCCS Policy EMP3) in the Black Country Plan Policy and their relationship to the criteria used in the BEAR are set out below:

1. To be highly accessible to the Strategic Highway Network, preferably well located to the motorway network, to provide good accessibility to international, national and regional markets and supply chains (BEAR criteria F and G).
2. To have good public transport accessibility (BEAR criteria H).
3. To have a critical mass of active industrial and logistics sites and premises that are well suited to the needs of modern industry (BEAR criteria I and J).
4. To maintain an existing, (or develop a potential), high quality environment, including suitable landscaping and greenspace and an attractive and functional built environment (BEAR criteria B).
5. To be attractive to national and / or international investment (BEAR criteria E).

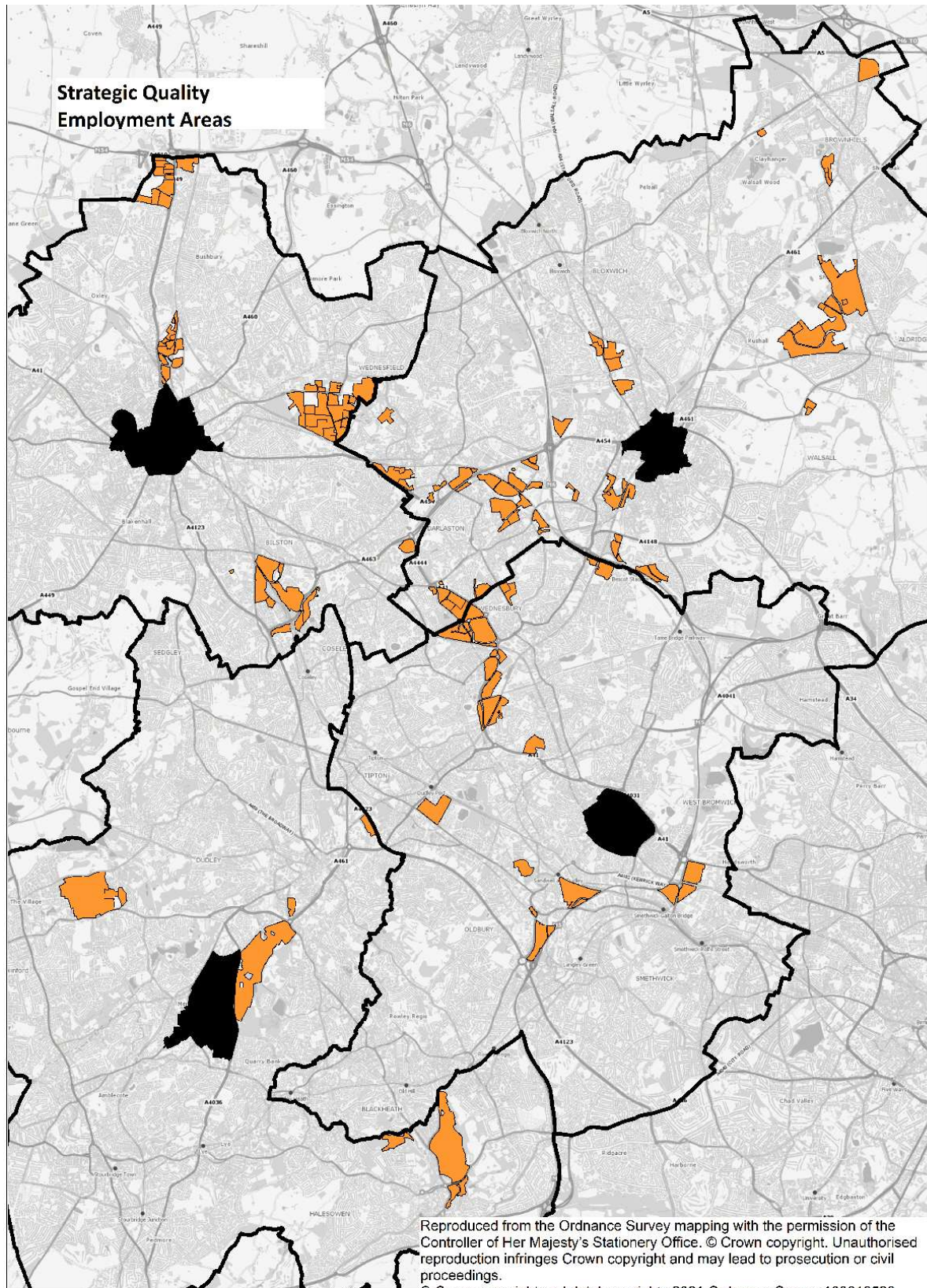
3.25 To identify the Strategic Employment Areas a combination of the overall score (of 30 or more) against all criteria and specific performance of the highest or second highest possible score against all of criteria E, F, G, I and J were used. In terms of public transport accessibility (BEAR Criterion H), this was not used as an essential 'gateway' test as public transport accessibility can be addressed by the provision of additional facilities and services. The high-quality environment criteria (BEAR

Criterion B) again was not a 'gateway test as this could be improved over time through public sector interventions or the actions of individual owners and occupiers.

- 3.26 Of the 123 areas which achieved a 30 plus score, all but 12 also met the other Strategic Employment Area requirements. These areas were then checked against their relationship to other Employment Areas in order that either they form contiguous blocks of Strategic Employment Land where possible (and were not surrounded by poorer quality land or residential areas), or they were areas were not subject to proposals for redevelopment for alternative uses where the strategic benefits of that development outweighed them being retained for employment use, or where planning permission has been granted for redevelopment to alternative uses. 10 Areas which otherwise met all Strategic Employment Area requirements were recommended as not being appropriate for Strategic Employment Area designation for these reasons.
- 3.27 The next step was to consider areas which did not meet all of the Strategic Employment Area criteria but which were surrounded by areas which did. A number of these areas were recommended for inclusion as Strategic Employment Areas where it was considered they had the potential for improvement and investment over the Plan period and were capable of achieving Strategic Employment Area status. 39 Employment Areas fell within this category.
- 3.28 On the basis of this work, it is recommended that 137 Areas covering 1,116ha are designated as Strategic Employment Areas in the Plan.



### Map 4 – Strategic Employment Areas

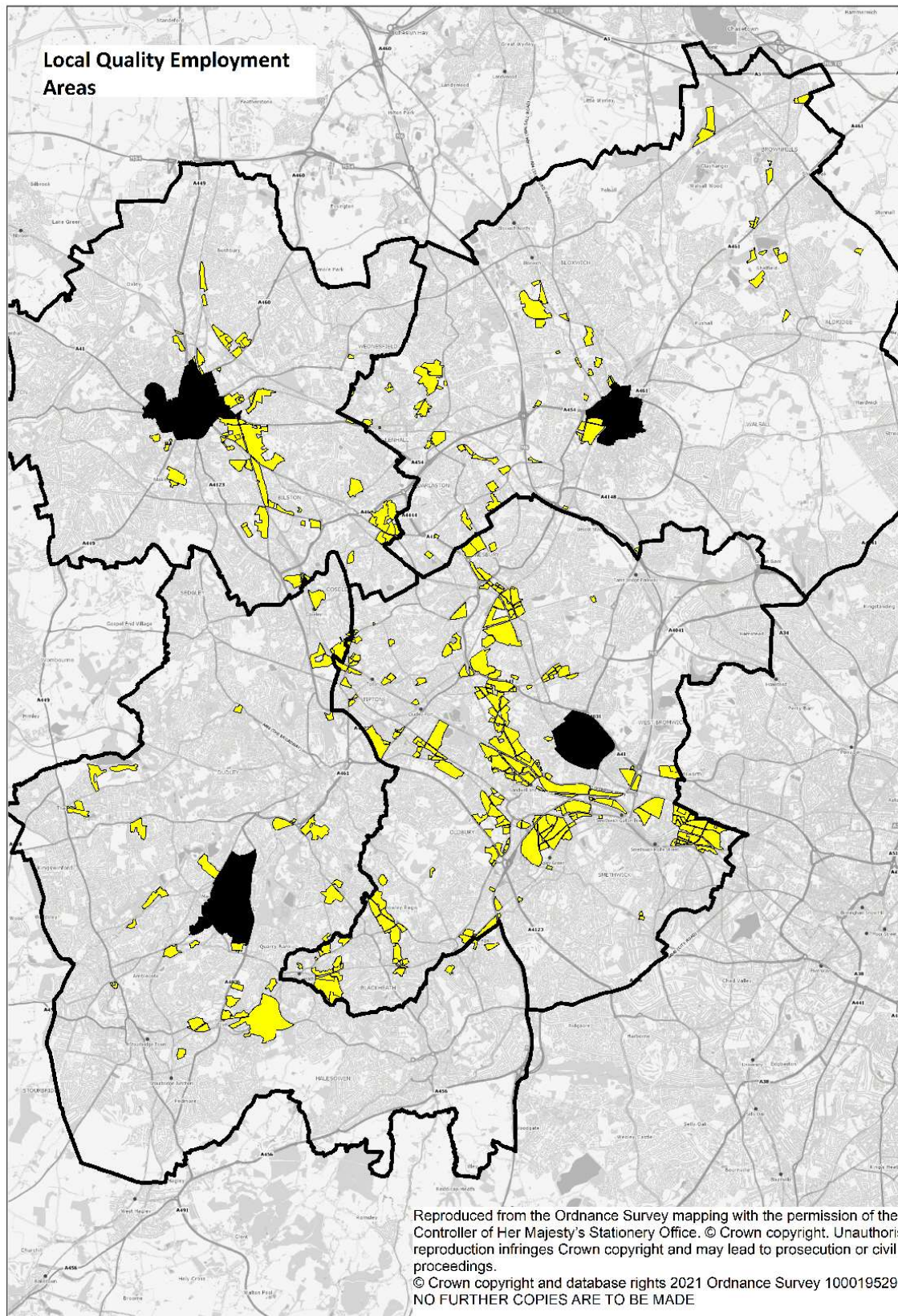




- 3.29 These Areas are shown on Map 4, and a detailed map of the whole Black Country at Appendix 2.
- 3.30 Stage 4b – Local Quality Employment Areas
- 3.31 In the light of the EDNA Report recommendations, the Local Employment Areas should continue to be safeguarded for those uses considered to be suitable for Strategic Employment Areas, but also motor trade activities, including car showrooms and vehicle repair, Haulage and transfer depots, Trade, wholesale retailing and builders' merchants, Scrap metal, timber and construction premises and yards, and Waste collection, transfer and recycling uses.
- 3.32 The criteria to be used to identify Local Quality Employment Areas (as set out in BCCS Policy EMP3) in the Black Country Plan Policy and their relationship to the criteria used in the BEAR are set out below:
- A critical mass of active industrial and service uses and premises that are fit for purpose (BEAR criteria C and I).
  - Good access to local markets, suppliers and employees chains (BEAR Criterion G).
  - The existing or potential use and / or the traffic generated by the use does not have an unacceptable impact on the amenity of surrounding land uses or on the highway network chains (BEAR criteria G and J).
- 3.33 To 'automatically' qualify as a Local Quality Employment Areas a combination of the overall score (of 21 or more) against all criteria and specific performance against Criterion G (areas which do not have restricted access for all commercial vehicles (a score of 2 or more)) and Criterion J (not being surrounded on all sides by constraining uses (a score of 0 to -3)) were used. In terms of public transport accessibility (BEAR criteria H), this was not used as a 'gateway' test as public transport accessibility can be addressed by the provision of additional facilities and services.
- 3.34 A total of 345 Employment Areas had a score of between 21 and 29. As with the approach to Strategic Employment Areas, these areas were then checked against their relationship to other Employment Areas in order that either they form contiguous blocks of Local Employment Land where possible (and were not surrounded by poorer quality land or residential areas), or they were not subject to proposals for redevelopment for alternative uses where the strategic benefits of that development outweighed them being retained for employment use, or where planning permission has been granted for redevelopment for alternative uses. 40 Areas which met all Local Employment Area requirements were recommended as not being appropriate for Local Employment Area designation for these reasons.

- 3.35 The next step was to consider areas which did not meet all of the Local Employment Area criteria but which were surrounded by areas which did. A number of these areas were recommended for inclusion as Local Employment Areas where it was considered they had the potential for improvement and investment over the Plan period and were capable of achieving Local Employment Area status. 40 Employment Areas fell within this category.
- 3.36 A further 11 Areas were recommended for Local Employment Area designation which scored 30 or more and met Local Employment Area requirements, and an additional 4 Areas which met all requirements of Strategic Employment Area designation but which were not recommended for designation as Strategic Employment Areas for the reasons set out above in para 3.26.
- 3.37 On the basis of this work, it is recommended that 333 Areas covering 1618ha are designated as Local Employment Areas in the Plan. These Areas are shown on Map 5, and a detailed map of the whole Black Country at Appendix 2.

### Map 5 – Local Employment Areas



- 3.38 Stage 4c - Identification of low scoring areas for assessment for alternative uses
- 3.39 The assessment has shown that a number of existing employment areas are performing poorly and are characterised by high levels of vacancies, constrained access and poor environmental quality. In some cases all of these factors.
- 3.40 As set out above Para 121 of the NPPF advises LPAs that land and premises which supports key economic sectors should be safeguarded for such uses. This is supplemented by Para 041 of the PPG which requires that Plans should be informed by assessments of the existing and future supply of land available for economic development and its suitability to meet identified needs. This should include a reappraisal of the suitability of previously allocated land.
- 3.41 Stage 4c of the BEAR assessed whether those lowest scoring and poorly performing Employment Areas could be redeveloped for alternative uses such as housing on the basis that they no longer fulfilled a viable economic role and were unlikely to do so in the future. Those Employment Area with a score of 20 or less (less than 50% of the maximum score), or had high levels of vacancy (with less than 40% of buildings occupied) (score of no more than 1 against BEAR Criterion C) or are adjacent to non-industrial sensitive uses on all sides (score of -4 against BEAR Criterion J) were subject to further assessment.
- 3.42 A total of 212 Employment Areas had a score of 20 or less. Of these, 41 were recommended for designation as Strategic or Local Quality Employment Areas in Stages 4a and 4b of the work and so were excluded from further assessment. A further 37 Areas which had a score of 21 or more and not considered suitable for Strategic or Local Employment Area designation again through Stages 4a and 4b were in scope for this part of the assessment. Therefore, 208 Areas were within scope.
- 3.43 The criteria used for the areas in scope for this part of the Study were:
1. Is the site suitable for non-employment uses – is it allocated for such uses or has a planning permission been granted for non-employment uses?
  2. Does the area already contain a high proportion of non-employment uses (e.g. quasi-retail/ gyms/ banqueting suites). These may not necessarily have planning permission but may have become lawful with time?
  3. Is there a likely mechanism by which the site might be redeveloped for another use? E.g. does the site adjoin existing housing that could feasibly extend onto the site.
  4. Does the site have a high vacancy rate?
  5. Is there evidence of recent investment in the area or adjoining areas by existing businesses?
  6. Is the existing use a 'bad neighbour' that would benefit from relocation?

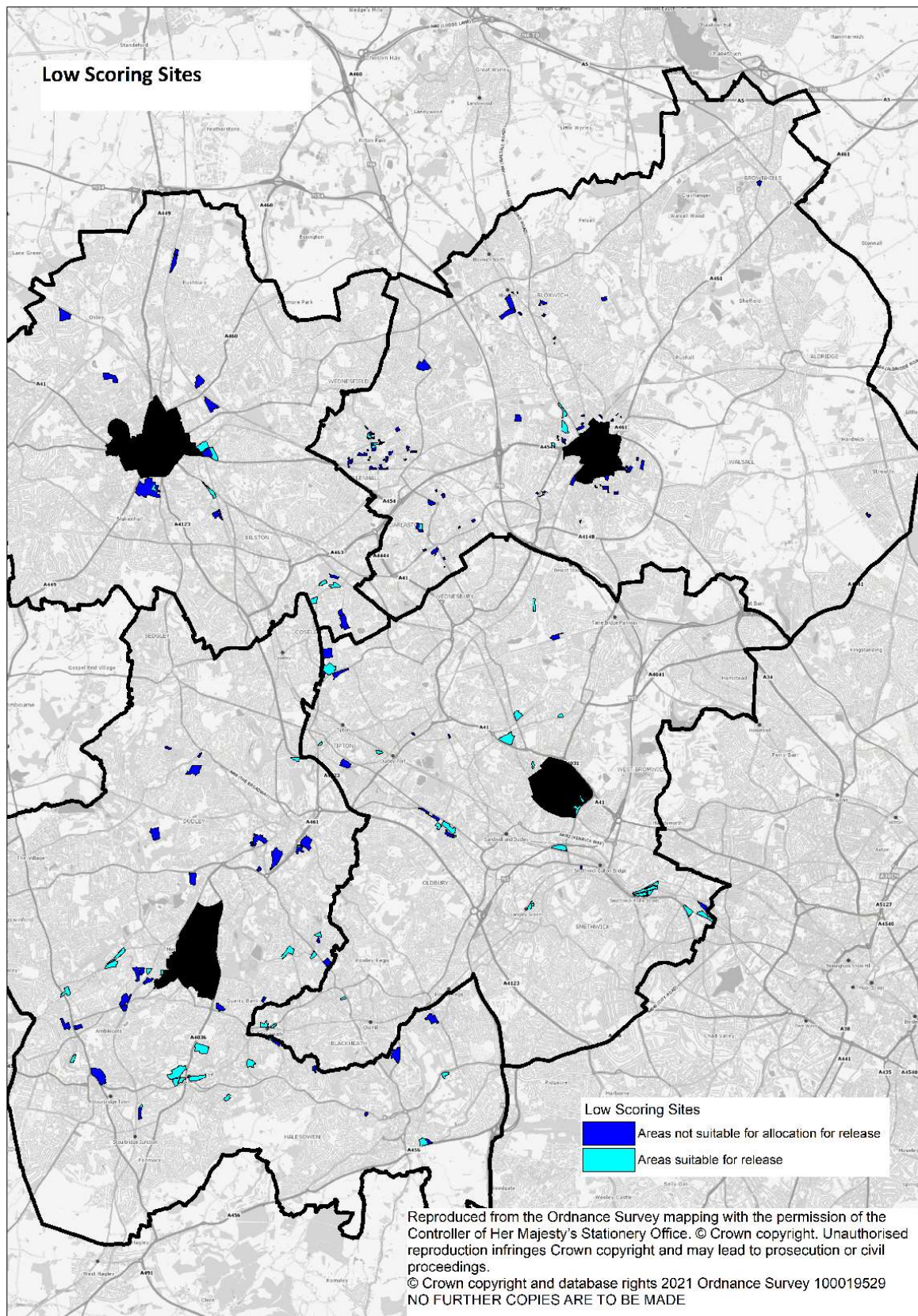
7. Does the site contain strategic or other uses that would be difficult to relocate.
8. Is there evidence of existing occupiers looking to relocate to indicate that the area is no longer meeting business requirements?
9. Would an alternative use compromise adjacent employment activity?
10. Has there been any substantive interest in redeveloping the site for an alternative use, for example, a call-for-site submission or pre-application submission?

3.44 This assessment involved a combination of site visits, desk-top analysis and direct contact with landowners and occupiers. Of the criteria listed above, (8) was particularly important in determining whether the Areas should be considered for 'release' for employment and potentially suitable for redevelopment for residential. This is because the Plan must demonstrate that allocations are deliverable in that there is a willing landowner or a delivery programme either in place or in preparation to facilitate redevelopment.

3.45 The findings of Stage 4c are shown on Map 6 below and a detailed map of the whole Black Country at Appendix 2.



Map 6 – Stage 4c findings



3.46 On the basis of the criteria, 61 Areas covering 109ha of land were recommended to be suitable for 'release' for redevelopment to alternative uses. However, many of these areas are associated with high levels of voids: the net area of employment land that they contribute to the supply and which might need to be replaced elsewhere is only 63ha.

3.47 The majority (149 Areas covering 187ha) were not considered to be suitable or available for redevelopment at this stage. However, it is recognised that these 'other' employment areas play a limited economic role and the Black Country Plan could provide a degree of flexibility that would allow them to be redeveloped in the future, but subject to criteria that would protect existing businesses operating from the site, and evidence that the site is not attractive to alternative occupiers through it being marketed for an alternative employment use.

### **3.48 Stage 5 Moderation of Results**

3.49 The scoring produced some inconsistencies and anomalies, for example where similar sites lay close to each other but in different local authorities, or where a low scoring site was surrounded by high scoring ones. In some cases therefore the proposed status in the BCP was adjusted from that produced by the scoring.

## 4. Conclusions and recommendations

- 4.1 The Study has provided a balanced, robust and detailed assessment of the quality of the Black Country's employment areas. It updates the work prepared for the Black Country Core Strategy taking into account the findings and recommendations of the 2017 and 2021 EDNA.
- 4.2 The overall findings of the work are summarised in table 4 below. A detailed map of the whole Black Country is contained at Appendix 2.

**Table 4 - Summary of BEAR recommendations**

	Strategic Quality		Local Quality		Other Employment Areas		Allocate for housing / non - employment uses	
	Areas	Area (ha)	Areas	Area (ha)	Areas	Area (ha)	Areas	Area (ha)
Dudley	9	266.4	36	272.4	31	74.3	24	46.2
Sandwell	18	218.4	194	854.7	24	22.7	21	40.5
Walsall	63	372.1	59	216.3	82	43.5	9	8.0
Wolverhampton	47	259.2	44	273.7	12	46.8	7	14.6
<b>Total</b>	<b>137</b>	<b>1,111.6</b>	<b>333</b>	<b>1,617.1</b>	<b>149</b>	<b>187.3</b>	<b>61</b>	<b>109.3</b>

- 4.3 The approach to identifying Strategic Employment Areas ensures that the very best quality employment areas in the Black Country are safeguarded for key manufacturing and logistics activity critical to the recovery and growth of the Black Country Economy. The Study also recommends that large tracts of Local Employment Areas are viable and sustainable locations for a wider range of economic activity and businesses.
- 4.4 The work confirms that a number of employment areas have a limited economic role and are suitable for 'release' to non-employment uses. The quantum of land recommended for release to alternative uses is far less than contained in current Local Plans, recognising that many of these areas have a viable and sustainable future as locations for continued employment activity. For those areas which are recommended as being suitable for redevelopment, the Plan should consider whether this land should form part of the overall employment land demand requirement in order that there is no net loss of employment land over the Plan period.



## **Appendix 1 – assessment criteria**

**BEAR Scoring proforma**

Criteria	Detail	Score	Scoring criteria
Environmental	(A) Building quality and suitability for employment uses	1	Very poor condition – visible structural problems and building eg windows missing and holes in roof - not suitable for occupancy in current state.
		2	Poor condition – major repair and / or technical work required
		3	Satisfactory condition – normal repair / maintenance requirement
		4	Good condition – lower than normal maintenance required in the medium term
	(B) General external environment	1	Very poor quality – fly tipping, roads in need of complete overhaul, derelict sites, poor quality buildings, numerous unstructured open storage. Very poor availability of services eg parking, delivery space, waste storage
		2	Below average quality – maintenance of public realm poor, extensive repairs needed to roads, some open storage, vacant plots appear abandoned, buildings below average quality. Below average availability of services eg parking, delivery space, waste storage
		3	Average quality – few landscaped areas and where present maintenance required. Average quality buildings. Significant road repairs needed. Some derelict sites but not highly visible. Vacant plots untidy and requiring major improvement. Average availability of services eg parking, delivery space, waste storage
		4	High quality – less extensive landscaping but public realm maintained. Road maintenance adequate. Buildings of appropriate quality. No derelict sites but vacant ploys need some maintenance. High quality availability of services eg parking, delivery space, waste storage
		5	Excellent quality – extensive external public realm and Green Infrastructure and Brown Infrastructure areas well maintained. No

Criteria	Detail	Score	Scoring criteria
			road maintenance issues, high quality external appearance, no derelict sites. Vacant plots maintained. Excellent availability of services eg parking, delivery space, waste storage
	(C) Levels of visible voids	1	Less than 40% of the buildings occupied
		2	40-60% of buildings occupied
		3	60-80% of buildings occupied
		4	80-90% of buildings occupied
		5	90-100% of buildings occupied
Visibility and Profile	(D) Nature of existing tenants	1	Local companies with limited choices in terms of alternative location
		2	Companies drawn from local area but could be seen as having a choice of locations in local area
		3	No national / international names
		4	Some national / international names present, majority of occupiers are regional
		5	National / international names are a significant presence.
	(E) Market attractiveness	1	Site attractive to local companies
		2	Site attractive to sub-regional companies
		3	Site attractive to national companies
Accessibility	(F) Strategic accessibility to the motorway network	1	30 minutes drive time to motorway or dual carriageway with direct motorway access
		2	20-30 minutes drive time
		3	10-20 minutes drive time
		4	5-10 minutes
		5	0-5 minutes
	(G) Local car, commercial and HGV access	1	Restricted access by all commercial vehicles,
		2	Restricted access for HGVs and restricted access to major road network
		3	Easy immediate site access but wider issues on link to strategic highway network
		4	No access issues for vehicles

Criteria	Detail	Score	Scoring criteria
	(H) Public transport accessibility	0	Edge of site more than 400 metres walking distance of high level bus, metro or rail service defined as 15 minute journey time to Strategic Centre or Town Centre at a 15 minute frequency.
		1	Edge of site within 400 metres walking distance of high level bus, metro or rail service defined as 15 minute journey time to Strategic Centre or Town Centre at a 15 minute frequency..
		2	Edge of site within 400 metres walking distance of high level bus service defined as 10 minute journey time to Strategic Centre or Town Centre at a 5-6 minute frequency.
Proximity to knowledge clusters and key businesses.	(I) Critical mass of employment activity	1	Isolated area surrounded by non-employment uses, often with low levels of employment on the site itself
		2	Intermediate area
		3	Large area or part of a cluster of areas with high levels of employment and/or a large number of different employers
	(J) Proximity of non-industrial adjoining uses that could restrict industrial activity on site.	0	No constraining non-industrial uses
		-1	Constraining uses on one side.
		-2	Constraining uses in two sides.
		-3	Constraining uses on three sides
		-4	Constraining uses on all sides
	K. Growth sector businesses as defined by the Black Country Local Enterprise Partnership (LEP).	0	No companies on database within area
		1	1 company on database within area
		2	2 companies on database within area
		3	3 companies on database within area
4		4 companies on database within area	
	5	Over 5 strategic and growth companies in area	

## **Appendix 2 – Employment Areas assessed in the Study and recommendations**

## **Appendix 3 – Employment Areas Assessment**



