

BIRMINGHAM DEVELOPMENT PLAN EXAMINATION

**MATTER B: EMPLOYMENT LAND AND RETAIL
PROVISION (BDP POLICIES PG1 & TP16)**

**STATEMENT ON BEHALF OF BIRMINGHAM CITY
COUNCIL**

Main issue: Does the Plan make adequate and appropriate provision to meet employment and retail development needs?

General

- G.1 The plan makes adequate and appropriate provision to meet both employment and retail development needs. In relation to employment development the plan seeks to ensure that an appropriate supply of employment land is available at all times to meet the needs of businesses based on evidence of anticipated demand submitted with the plan. Likewise, the overall levels of retail floorspace over the plan period are soundly based on evidence submitted with the plan.

Employment Development

Issue 1

Is the Plan based on a clear economic vision and strategy to encourage sustainable economic growth?

- 1.1 Work undertaken by Warwick Economic & Development (WECD) and PA Consulting (EMP 3) has identified a number of key targeted growth sectors which are important to the future of the City's economy. These targeted sectors are:

Advanced Manufacturing;
Financial services;
Business and Professional Services;
Food and Drink;
Computer Services and Software;
Life Sciences

- 1.2 A number of other sectors are also identified in the report as having growth potential include waste collection, treatment and supply and creative arts and entertainment activities.
- 1.3 The report considers the growth potential of each of these sectors and estimates the land required to support each sector over the plan period based on the forecast increase in GVA and employment. The largest floorspace requirements are generated by the advanced manufacturing and logistics sectors although the report identifies a significant shortage of available land to meet the requirements of these sectors. The largest growth in terms of employment is in financial, business and professional services.
- 1.4 The BDP proposes an economic strategy and vision which supports the growth of these key sectors by ensuring that sufficient land is available to accommodate this growth as far as possible over the plan period. In terms of financial and professional services the BDP recognises the key role of the City Centre in delivering high quality office accommodation and also the role it can play in supporting digital media and creative industries in quarters such as Digbeth. The City Centre alone has potential to

accommodate 700,000 sq. m. of office floorspace and has an Enterprise Zone in place covering 26 sites to support delivery. A network of sub-regional and District Centres provides further opportunities to support office growth.

- 1.5 In terms of meeting the needs of the other growth sectors the BDP proposes a continuous supply of industrial land in the form of a 5 year rolling reservoir of industrial sites and the protection of core employment areas (Policies TP16, TP18 and TP19) which will play an important role in accommodating this growth. The BDP has also sought to address through the proposed allocation at Peddimore (Policy GA6) the shortage of land for advanced manufacturing and logistics. 40 hectares of the Peddimore site is reserved to meet the needs of the manufacturing sector.
- 1.6 The provision of sufficient employment land and premises is only part of the City's strategy for creating sustainable economic growth. The BDP recognises the importance of a thriving network of local centres to deliver new office, retail and leisure development. The BDP also recognises the key role of the City's education establishments in delivering the growth agenda and supports the expansion of the City's Universities and the development of new schools in locations where additional provision is required to meet the needs of the growing population (Policy TP35). An Education Development Plan (H8) has been prepared as a supporting document to the BDP which outlines where additional provision is needed and the City Council's Strategy for dealing with the growth in school places.
- 1.7 The BDP also aims to ensure that the benefits of new development are targeted at local people. The City Council has an Employment Access Team (EAT) which seeks to encourage developers to sign up to targets for the recruitment and training of local people during the construction phase of development, and where appropriate for the end use.

Issue 2

Are the overall requirements of policy PG1 for employment land and office floorspace soundly based on evidence, and appropriate to meet the needs that are likely to arise over the Plan period?

- 2.1 The overall requirements for employment land and office floorspace contained in policy PG1 are based on the study undertaken by Warwick Economics and Development (WECD) – Employment Land and Office Targets Study 2013 (EMP4). This study considered the demand for employment land for both industrial and office development between 2012 and 2031. Two methods were used to consider the estimated demand for employment development – Growth projections (GVA and employment) and average annual completion levels.
- 2.2 In terms of industrial land the study recognises that Birmingham is one of the key industrial areas in the UK lying at the heart of the UK motorway and rail network with access to one of the principle concentrations of population and employment in

the country (para 4.22 EMP4). There remains a strong manufacturing base within the City including companies such as Jaguar Land Rover and Kraft. The City is also a prime location for distribution and logistics given its location at the heart of the West Midlands conurbation.

- 2.3 The study notes the significant growth potential within the manufacturing sector with strong growth in GVA forecast in the period to 2031 (figs 3.14 and 3.15 p19 EMP4). Growth is also predicted to occur in the demand for warehousing and distribution albeit at a lower rate than manufacturing.
- 2.4 The WECD report uses these growth forecasts together with an analysis of annual average completion figures to estimate the demand for industrial land. The most likely estimate is that completions for B2 and B8 uses will be 379 hectares between 2012-2031 (figure 5.7 p.32 EMP4). The positive impact of HS2 has been considered and added to most likely scenario. Taking account the impact of HS2 the most likely requirements for industrial land increase to 407 hectares (fig 5.9 p.34 EMP4).
- 2.5 Forecasting employment land requirements always involves an element of uncertainty but the 407 hectare figure does not deviate significantly from historic average annual completion figures during the period 2001-2012.
- 2.6 A review of the property market and historic completions has been undertaken to determine the distribution of this requirement and suggests that a significant proportion of these completions will be on large sites including Regional Investment Sites and Best Urban land. The 407 hectare requirement has therefore been translated into the following categories:

Figure 5.12: Industry Site Type Demand, 2012-2031

Industrial Site Type	Most Likely Requirements	Potential Maximum Requirements
RIS	45	52
Best Urban	224	257
Good Urban	118	136
Other Urban	20	23
Total	407	468

Source: WECD. NOTE: Figures may not sum due to rounding.

- 2.7 Examining demand for industrial land in terms of 5 yearly intervals translates to a requirement of 107 hectares or 96 hectares every 5 years excluding specific provision for Regional Investment Sites for which demand equates to supply over the plan period. This 96 hectare requirement has translated into the following minimum reservoir requirements.

Figure 7.3: Minimum Reservoir of Industrial Land in any 5-year Period

Site Type	Quantity (ha)	Annual Requirement (ha)
Best Urban	60	12
Good Urban	31	6
Other Urban	5	1

Source: WECD. NOTE: Figures are rounded.

- 2.8 In terms of office development the WECD report recognises the key role of the City Centre in accommodating future office growth. The report estimates that future office floorspace requirements could range from 574,000sq m to a higher demand level of 950,000sq m over the plan period. The study recommends that it would be prudent to cater for a mid-point between the two scenarios (EMP4 para 7.6). Policy PG1 reflects this view and recommends that a minimum of 745,000sqm is provided over the plan period predominantly in the City Centre. The report notes that the Enterprise Zone in the City Centre alone could accommodate around 750,000sqm with potential for a further 60,000 sqm in District Growth Points.

Issue 3

If housing provision is made outside the Plan area to meet Birmingham’s needs, is there a need for employment land also to be allocated outside the Plan area to complement that housing provision?

- 3.1 In order to provide sustainable developments it is reasonable to assume that a commensurate amount of employment land should be provided to complement housing provision made to meet Birmingham’s needs outside of the City’s boundaries. This will help to provide balanced mixed use communities. However, it is important that employment land provision outside of the City is kept within reasonable limits to ensure that decentralisation does not occur which could prejudice urban renaissance. The WECD report estimates of industrial and office floorspace (EMP4) required between 2012 and 2031 and would not change significantly should some employment land provision be made outside the City’s boundaries to support housing provision.

Issue 4

Does the categorisation of employment land into Regional Investment Sites and three other quality categories appropriately reflect future business needs?

- 4.1 The portfolio of employment land is intended to meet the needs of a variety of businesses ranging from small sites suitable for small companies and start-up businesses to large sites capable of accommodating the needs of international businesses.
- 4.2 TP16 recognises the need for a range of business premises.

Issue 5

Does the Plan make appropriate provision to support existing business sectors and new or emerging sectors?

- 5.1 The plan makes appropriate provision to support both existing business sectors and new or emerging sectors in a number of ways. As set out in the response to question 1 the City's economic strategy is based on an assessment of key targeted growth sectors that are important to the future of the City's economy which includes both existing and emerging sectors (figure 1.1 EMP3).
- 5.2 In terms of business undertaking activities suitable for industrial areas the plan seeks to protect the core employment areas which have been identified as the focus of the City's industrial activity (Policy TP18). The policy also includes a commitment for these areas to be the focus of economic regeneration activities. Types of support include measures to improve operational and functional efficiency and the quality and attractiveness of these areas to stimulate new investment and job creation. In particular, improvements to the transport network will be encouraged to improve access, reduce congestion and reduce conflict with adjacent residential areas where this exists. There is significant potential to improve a number of these areas by making enhancements to local infrastructure. There is potential to generate funding to support these enhancements by securing section 106/ CIL contributions from proposals involving the appropriate loss of employment land to alternative, higher value uses (policy TP19).
- 5.3 For office based businesses the City Centre Enterprise Zone offers a range of benefits to support existing, emerging and new business sectors including business rates relief, simplified planning and enhanced marketing (EMP10). The plan also supports significant growth in retail, office and leisure developments in centres. The focus for significant growth will be the City Centre, Sutton Coldfield, Selly Oak, Perry Barr and Meadway but there is also potential for growth in several of the District Centres, notably Erdington, Mere Green and Northfield (Policy TP20).
- 5.4 The IDP Schedule (IMP1) refers to essential infrastructure projects to support employment growth in the City, and a number of examples are highlighted below:
- The Birmingham City Centre Enterprise Zone Investment Plan (EMP10) identifies infrastructure projects to unlock development and growth in the city centre, including the redevelopment of New Street Station, enhancing pedestrian connections and digital connectivity.
 - A package of highway improvement works to support the Aston Regional Investment Site (RIS) has been identified and funding secured to improve accessibility to/ from the site.
 - Improvement works to Tyseley Bridge are necessary to improve accessibility to the Tyseley Environmental Improvement District (TEED).

- 5.5 The City Council will also seek to utilise external sources of funding to improve the quality and attractiveness of employment sites. For instance the Growing Places Fund is currently being used to address access and land assembly issues at the Aston Regional Investment Site (Advanced Manufacturing Hub).

Issue 6

Does the “5-year reservoir” approach set out in policy TP16 provide adequate certainty that sufficient appropriate employment land will come forward to meet business needs throughout the Plan period?

- 6.1 The 5 year minimum reservoir is intended to ensure that the City has a readily available supply of sites to meet future demand and accommodate new employment generating investment. The objective is to ensure that no desirable employment development is lost due to the lack of an available site. The reservoir of land provides a range and choice of sites to meet a variety of business needs at any point in time during the plan period. However, the reservoir approach also recognises the cyclical nature of the economy which can lead to peaks and troughs in demand. The minimum reservoir approach has been followed by the City Council since the 1993 Unitary Development Plan and was endorsed by the Panel that considered the 2008 Review of the Regional Spatial Strategy as an effective approach which should be taken up by Local Authorities across the West Midlands.
- 6.2 The latest employment land supply figures are attached in appendix 1. In terms of best quality land there is an existing supply of 66.87 hectares of which 42.81 hectares is considered readily available for development – 17.19 short of the minimum reservoir requirement. The City Council recognises that there is an insufficient supply of best quality land and has proposed to release 80 hectares of Green Belt at Peddimore to address this shortfall. The Peddimore allocation in addition to the existing supply of best quality sites means that there will be over 12 years supply of identified readily and not readily available sites which is more than double the minimum reservoir requirements and will meet demand to 2026 based on average completion rates.
- 6.3 The availability of good urban land also falls short of the readily available target within the BDP with existing supply consisting of 20.79 hectares of readily available supply and 25.50 hectares of not readily available land. The total supply of currently identified good urban land therefore equates to nearly 8 years demand based on average completion rates of 6 hectares per year. Additions to future good urban land supply will come from future recycling opportunities discussed in para 6.5 below. The City Council has also sought to resist the loss of good urban sites proposed for alternative uses where it is felt that such sites could contribute to future supply.
- 6.4 In terms of other urban land there is a total supply currently available of 8.43 hectares of which 6.32 hectares is readily available, 1.32 hectares above the 5 year minimum reservoir requirement. Future supply will again be focused through the recycling of existing sites and the expansion of existing buildings.

- 6.5 The above analysis of supply does not include any allowance for additional recycling opportunities to become available during the plan period as a result of unexpected factory closures or poorer quality land being recycled to provide better quality modern accommodation. Since the adoption of the 1993 Unitary Development Plan the City's industrial land strategy has been predominantly based on the recycling of existing industrial sites. Over the past 10 years (2004-2014) a large proportion of completions have been on existing industrial land that has been redeveloped. Over 133 hectares of brownfield industrial sites have been recycled during this period at an average of 13 hectares per year. The WECD report notes that there are limited opportunities to identify large brownfield sites in the urban area but nevertheless recycling will continue to be an import source of future supply. The WECD report estimates that a further 35 hectares of unidentified recycling opportunities will come forward in the period to 2031 but given past performance this should be considered as a conservative figure particularly given the 717 hectares of employment land in the city. It is anticipated that a significant element of future recycled sites will be in the good urban category. However, opportunities will also emerge in the best quality market as demonstrated in the proposals being brought forward in the Bordesley Area Action Plan (G4) for the Birmingham Wheels site, which has the potential to add up to 30 hectares to best quality supply. A further example is the growth of Jaguar Land Rover both on its existing site at Castle Bromwich and also through the acquisition of adjoining land which was previously in retail and industrial use. The majority of recycling opportunities are likely to occur within the Core Employment areas which are safeguarded for employment development. These proposals demonstrate the ongoing commitment to supporting brownfield regeneration to provide economic development opportunities within the urban area.

Issue 7

If not, what alternative approach should be followed?

- 7.1 The alternative approach considered would be to attempt to allocate all of the land required for employment development over the plan period. This is not considered to be appropriate as it is inevitable that further recycling opportunities will become available during the plan period and it is impossible to identify these opportunities at this stage. This approach also fails to recognise the cyclical nature of the market and the peaks and troughs which can occur. Allocating all of the land required could also lead to land becoming sterilised unnecessarily.
- 7.2 It also needs to be recognised that estimating future employment land requirements is a difficult exercise and it is impossible to be precise about the exact level of future demand.

Issue8

Are the overall requirements of policy PG 1 for retail floorspace (as amended by the Council's proposed main modification MM7) soundly based on evidence and appropriate to meet the needs that are likely to arise over the Plan period?

- 8.1 The overall levels of retail floorspace over the plan period are soundly based on evidence submitted with the plan. This comprises the Birmingham Retail Needs Assessment 2009 (EMP5) and the Retail Needs Assessment Update (EMP6). These follow NPPF requirements and the Update takes into account retail need over the revised plan period to 2031 and reflects the lower expenditure projections which followed the onset of the recession.
- 8.2 The rationale for the comparison floorspace requirement set in the Plan is contained in section 4 of the Update. The Council has chosen only to include within policy PG1 a requirement for comparison retail floorspace to 2026. This reflects the major uncertainties that surround the retail sector currently which mean that little reliance can be placed on projections for the last five years of the plan period. The overall requirement figure contained in the pre-submission plan was incorrect because it omitted the floorspace to be delivered in local and district centres. Main Modification MM7 corrects this and brings the requirement in line with policy TP20 (which shows the distribution of the proposed floorspace by centre), and table 4.2 of the Retail Assessment Update.

Appendix 1

Industrial land by industrial classification at April 2014, including completions for 2013 to 2014

SecondaryAddress	PrimaryAddress	StreetName	SiteArea	PlanStatus	SiteStatus	Available
Regional Investment Sites						
	1623 TO 1661	BRISTOL ROAD SOUTH	0.95	UDP Allocation	Not Started	Yes
	LAND BETWEEN AND REAR OF 1585 TO 1619	BRISTOL ROAD SOUTH	0.92	UDP Allocation	Not Started	Yes
MG ROVER GROUP	SITE OF WEST WORKS	BRISTOL ROAD SOUTH	13.81	UDP Allocation	Not Started	Yes
SERPENTINE SITE	FORMER ASDA STORE	ASTON HALL ROAD	4.24	UDP Allocation	Not Started	Yes
	LAND AT	PRIORY ROAD	2.82	UDP Allocation	Not Started	No
		Available	22.74			
	1547 TO 1563	BRISTOL ROAD SOUTH	5.14	UDP Allocation	Not Started	No
	LAND BOUNDED BY	ASTON HALL ROAD, PRIORY ROAD AND RAILWAY	5.13	Non-Stat Plan	Not Started	No
	LAND AT	PRIORY ROAD	3.18	UDP Allocation	Not Started	No
QUEENS ROAD	LAND BOUNDED BY	ASTON HALL ROAD, CHURCH ROAD AND RAILWAY	5.72	Non-Stat Plan	Not Started	No
		Not Available	19.17			
		TOTAL	41.91			
Best Urban						
<i>PLOT 101/2</i>	<i>BIRMINGHAM GREAT PARK</i>	<i>HOLLYMOOR WAY</i>	<i>0.75</i>	<i>Detailed Planning Permission</i>	<i>COMPLETED</i>	<i>Yes</i>
		<i>HOLFORD PARK</i>	<i>1.26</i>	<i>Detailed Planning Permission</i>	<i>COMPLETED</i>	<i>Yes</i>
<i>JAGUAR CARS LTD</i>	<i>FORMER BLOCK E AND EPS</i>	<i>CHESTER ROAD</i>	<i>5.54</i>	<i>Detailed Planning Permission</i>	<i>COMPLETED</i>	<i>Yes</i>
<i>PLOT 5, PROLOGIS PARK</i>	<i>MIDPOINT 2</i>	<i>MIDPOINT WAY</i>	<i>8.35</i>	<i>Detailed Planning Permission</i>	<i>COMPLETED</i>	<i>Yes</i>
		TOTAL COMPLETED	15.90			
UNIT 101/1	BIRMINGHAM GREAT PARK	HOLLYMOOR WAY	1.75	UDP Allocation	Not Started	Yes
BIRMINGHAM RESEARCH PARK		VINCENT DRIVE	0.96	UDP Allocation	Not Started	Yes

	BIRMINGHAM RESEARCH PARK	VINCENT DRIVE	0.20	Detailed Planning Permission	Under Development	Yes
	LAND AT CYCLO WORKS	LIFFORD LANE	0.48	Detailed Planning Permission	Not Started	Yes
	FORMER PEBBLE MILL STUDIOS	PEBBLE MILL ROAD	0.35	Outline Planning Permission	Not Started	Yes
THE HUB PHASE 3	FORMER IMI WORKS	WITTON ROAD	6.28	Outline Planning Permission	Not Started	Yes
THE HUB PHASE 3 PLOT 3B	FORMER IMI WORKS	WITTON ROAD	0.70	Outline Planning Permission	Not Started	Yes
THE HUB PHASE 2	FORMER IMI WORKS	WITTON ROAD	6.31	Outline Planning Permission	Not Started	Yes
THE HUB	FORMER IMI WORKS	WITTON ROAD	4.58	Outline Planning Permission	Not Started	Yes
THE HUB PHASE 6	FORMER IMI WORKS	WITTON ROAD	11.13	Outline Planning Permission	Not Started	Yes
	HOLFORD PARK	THAMESIDE DRIVE HOLFORD WAY	0.92	UDP Allocation	Not Started	Yes
	TAMESIDE PARK	ALDRIDGE ROAD	0.48	Expired Planning Permission	Not Started	Yes
	TAMESIDE PARK	ALDRIDGE ROAD	0.62	Expired Planning Permission	Not Started	Yes
FORMER YUASA SITE	SIGNAL POINT PHASE 1	BATTERY WAY AND WESTON LANE	1.56	Detailed Planning Permission	Not Started	Yes
JAGUAR LAND ROVER LTD	MAINTENANCE AND UTILITY BLOCK	CHESTER ROAD	0.70	Detailed Planning Permission	Under Development	Yes
FORMER MINWORTH SEWAGE WORKS	MIDPOINT 2 (PLOT 1)	MIDPOINT WAY WATER ORTON LANE	2.65	Detailed Planning Permission	Not Started	Yes
MIDPOINT 2, PLOT 6	FORMER MINWORTH SEWAGE WORKS	WATER ORTON LANE	2.76	Detailed Planning Permission	Not Started	Yes
REMAINDER PLOT K	WOODGATE BUSINESS PARK	KETTLESWOOD DRIVE	0.38	Expired Planning Permission	Not Started	Yes
		Available	42.81			
FORMER YUASA SITE	SIGNAL POINT - PHASE 2	BATTERY WAY	1.75	Outline Planning Permission	Not Started	No

FORMER YUASA SITE	SIGNAL POINT - PHASE 3	BATTERY WAY	3.64	Outline Planning Permission	Not Started	No
WEBSTER AND HORSFALL	LAND SOUTH OF	THE FORDROUGH	4.05	Outline Planning Permission	Not Started	No
	LAND AT	ASHOLD FARM ROAD	4.37	Outline Planning Permission	Not Started	No
FORMER BIRMINGHAM BATTERY SITE	BIRMINGHAM BATTERY ADJACENT TO RAILWAY	OFF HARBORNE LANE	4.09	Outline Planning Permission	Not Started	No
ADJACENT GRAND UNION CANAL	TYSELEY WHARF	WHARF ROAD	5.26	Outline Planning Permission	Not Started	No
	SUTTON SQUARE	KINGSBURY ROAD	0.90	UDP Allocation	Not Started	No
		Not Available	24.06			
		Total	66.87			
Good Urban						
	24	EBURY ROAD	0.97	Detailed Planning Permission	COMPLETED	Yes
	FORMER DHL DEPOT	LANDOR STREET	3.33	Detailed Planning Permission	COMPLETED	Yes
		TOTAL COMPLETED	4.3			
	LAND CORNER OF	SOHO POOL WAY AND PARK ROAD	0.34	Committee Resolution	Not Started	Yes
	FORMER GKN FACTORY	OLD WALSALL ROAD	0.47	Detailed Planning Permission	Not Started	Yes
VENICREST	REGINA DRIVE	WALSALL ROAD	0.85	Expired Planning Permission	Not Started	Yes
	GOLIATH INTERNATIONAL LIMITED	MILLER STREET	0.33	Detailed Planning Permission	Not Started	Yes
CORNER WITH ADDERLEY STREET	LAND FRONTING	NEW BOND STREET	0.52	Development Brief	Not Started	Yes
	LAND AT	RUPERT STREET	0.45	Expired Planning Permission	Not Started	Yes
	WINDSOR STREET GAS WORKS	WINDSOR STREET	2.96	Non-Stat Plan	Not Started	Yes
	SMALL HEATH TRADING ESTATE	ARMOURY ROAD	0.43	UDP Allocation	Not Started	Yes

	FORMER FISHER FOUNDRIES LTD	ALBION ROAD	0.36	Detailed Planning Permission	Under Development	Yes
UNIT 2	47	DEVON STREET	0.40	UDP Allocation	Not Started	Yes
	CORNER ASTON CHURCH ROAD	AND HEARTLANDS PARKWAY	0.91	UDP Allocation	Not Started	Yes
FORMER BALFOUR BEATTY SITE	SAPCOTE BUSINESS PARK	SMALL HEATH HIGHWAY	0.96	Expired Planning Permission	Not Started	Yes
	2	HAY HALL ROAD	3.94	Detailed Planning Permission	Not Started	Yes
ATLAS ESTATE	LAND REAR OF	REDFERN ROAD	1.11	Expired Planning Permission	Not Started	Yes
	LAND ADJACENT ZIP TEXTILE SERVICES	REDFERN PARK WAY	0.42	Detailed Planning Permission	Not Started	Yes
	PART FORMER PALLETLINE SITE	TYBURN ROAD	0.33	Detailed Planning Permission	Not Started	Yes
	FORMER ROYAL WORKS	COLESHILL STREET	1.35	Expired Planning Permission	Not Started	Yes
FORMER GKN PLANT	OPUS ASPECT	CHESTER ROAD	1.41	Outline Planning Permission	Not Started	Yes
FORMER GKN PLANT	OPUS ASPECT	CHESTER ROAD	0.43	Outline Planning Permission	Not Started	Yes
PHASE 3	YARDLEY BROOK INDUSTRIAL ESTATE	LEA FORD ROAD	0.83	UDP Allocation	Not Started	Yes
	ACE BUSINESS PARK	MACKADOWN LANE	0.50	Expired Planning Permission	Not Started	Yes
	MINWORTH GREEN BUSINESS CENTRE	KINGSBURY ROAD	0.69	Expired Planning Permission	Not Started	Yes
	WHS HALO	WATER ORTON LANE	0.80	Expired Planning Permission	Not Started	Yes
		Available	20.79			
	ADJACENT BIRMINGHAM TO FAZELEY CANAL	CORNER OF ROCKY LANE AND CHESTER STREET	0.27	UDP Allocation	Not Started	No

	SITE CORNER OF	BROMFORD ROAD AND FORT PARKWAY	1.00	UDP Allocation	Not Started	No
ERDINGTON INDUSTRIAL PARK	CYCLONE	CHESTER ROAD	2.81	Expired Planning Permission	Not Started	No
	YARDLEY BROOK INDUSTRIAL ESTATE	LEAFORD ROAD	1.80	UDP Allocation	Not Started	No
	FORMER ARVIN MERITOR PREMISES	FORDHOUSE LANE	2.52	Committee Resolution	Not Started	No
	FORMER DEPOT	ALDRIDGE ROAD	0.73	Expired Planning Permission	Not Started	No
	FORMER P & O CONTAINER DEPOT	COLLEGE ROAD	8.28	Committee Resolution	Not Started	No
	LAND AT	PALMER STREET AND LITTLE EDWARD STREET	0.93	Outline Planning Permission	Not Started	No
	FORMER BORDESLEY CATTLE STATION	UPPER TRINITY STREET	0.81	Expired Planning Permission	Not Started	No
	ADJACENT ASTON GOODS STATION	RUPERT STREET	1.47	Expired Planning Permission	Not Started	No
	GRAVELLY INDUSTRIAL PARK	JARVIS WAY	3.54	Committee Resolution	Not Started	No
OFF NEW TOWN ROW	LAND BETWEEN	LOWER TOWER STREET AND CECIL STREET	0.45	Expired Planning Permission	Not Started	No
CENTRAL BUSINESS PARK	REAR OF ROTADIX BUILDING	MACKADOWN LANE	0.48	Expired Planning Permission	Not Started	Yes
	UNIT 4	BANNERLEY ROAD	0.41	Expired Planning Permission	Not Started	Yes
		Not Available	25.50			
		Total	46.29			
Other Urban						
<i>HOCKLEY BROOK TRADING ESTATE</i>	<i>UNIT 7</i>	<i>SOUTH ROAD AVENUE</i>	<i>0.12</i>	<i>Detailed Planning Permission</i>	<i>COMPLETED</i>	<i>Yes</i>

HOCKLEY BROOK TRADING ESTATE	UNIT 6	SOUTH ROAD AVENUE	0.04	Detailed Planning Permission	COMPLETED	Yes
CONNECT DISTRIBUTION LTD	MEDCO HOUSE	BORDESLEY GREEN ROAD	0.20	Detailed Planning Permission	COMPLETED	Yes
		TOTAL COMPLETED	0.36			
	ADJACENT 156	LEDSAM STREET	0.15	UDP Allocation	Not Started	Yes
	LAND BOUNDED BY	ICKNIELD STREET AND POPE STREET AND MORETON STREET	0.34	Detailed Planning Permission	Not Started	Yes
	OPPOSITE HOCKLEY CIRCUS	SOHO HILL	0.06	Committee Resolution	Not Started	Yes
	12	HEATHFIELD ROAD	0.03	Expired Planning Permission	Not Started	Yes
BALTIMORE TRADING ESTATE	CDGB LTD	BALTIMORE ROAD	0.21	Detailed Planning Permission	Not Started	Yes
	17A	ALCESTER ROAD	0.15	Expired Planning Permission	Not Started	Yes
OFF GEORGE STREET	LAND AT	BATH WALK	0.07	Expired Planning Permission	Not Started	Yes
	LAND CORNER OF	MILK STREET AND BORDESLEY STREET	0.10	Expired Planning Permission	Not Started	Yes
	LAND BETWEEN	PRICE STREET AND VESEY STREET	0.22	UDP Allocation	Not Started	Yes
CORNER HENEAGE STREET	69	DARTMOUTH MIDDLEWAY	0.25	Expired Planning Permission	Not Started	Yes
	ADJACENT 94	PRITCHETT STREET	0.12	Expired Planning Permission	Not Started	Yes
ADJACENT GUEST MOTORS	LAND FRONTING	BRACEBRIDGE STREET	0.25	Expired Planning Permission	Not Started	Yes
	10	ATHOLE STREET	0.12	Expired Planning Permission	Not Started	Yes

	LAND CORNER OF	WATERY LANE AND BOLTON STREET	0.13	Detailed Planning Permission	Not Started	Yes
CHESTON ROAD INDUSTRIAL ESTATE	LAND BETWEEN	CHESTON ROAD AND BIRMINGHAM TO FAZELEY CANAL	0.12	UDP Allocation	Not Started	Yes
MASON AND SONS LIMITED	ADJACENT BIRMINGHAM AND FAZELEY CANAL	WHARF STREET AND WAINWRIGHT STREET	0.31	Expired Planning Permission	Not Started	Yes
	ADJACENT TAME VALLEY CANAL	OFF MOOR LANE	0.13	Committee Resolution	Not Started	Yes
	NEWSHIRES INDUSTRIAL ESTATE	SYDENHAM ROAD	0.08	Committee Resolution	Not Started	Yes
BORDESLEY TRADING ESTATE	9 TO 19 AND 21 TO 23	BORDESLEY GREEN ROAD	0.26	Committee Resolution	Not Started	Yes
HOWELL AND SONS	30	INKERMAN STREET	0.34	Expired Planning Permission	Not Started	Yes
	LAND ADJACENT BOC	PLUME STREET	0.11	UDP Allocation	Not Started	Yes
UNIT 41 METAL TREATMENTS LTD	HAY HALL WORKS	REDFERN ROAD	0.36	UDP Allocation	Not Started	Yes
	135	CHERRYWOOD ROAD	0.36	Expired Planning Permission	Not Started	Yes
	ADJACENT TO RAILWAY	ASTON CHURCH ROAD	0.25	Detailed Planning Permission	Not Started	Yes
	901	TYBURN ROAD	0.09	Expired Planning Permission	Not Started	Yes
HSS, UNIT 4 FORMER PARKINSON COWANS WORKS	ADJACENT 635	KINGSBURY ROAD	0.15	Expired Planning Permission	Not Started	Yes
	LAND OFF	FLAXLEY ROAD AND STATION ROAD	1.20	Committee Resolution	Not Started	Yes
	878-880	KINGSBURY ROAD	0.11	Non-Stat Plan	Not Started	Yes
M TAYLOR STEEL PLC	UNIT 26 MINWORTH INDUSTRIAL PARK PROFILE HOUSE	FORGE LANE	0.12	Expired Planning Permission	Not Started	Yes

	SUNNYSIDE & BROOKLYN	KINGSBURY ROAD	0.13	Expired Planning Permission	Not Started	Yes
		Available	6.32			
	LAND FRONTING	SHAW'S PASSAGE	0.16	Committee Resolution	Not Started	No
MOSELEY TYRE SERVICE	222 TO 224	HIGHGATE ROAD	0.05	Expired Planning Permission	Not Started	No
SITE D	BORDESLEY CIRCUS	BORDESLEY MIDDLEWAY AND BORDESLEY PARK ROAD	0.28	Development Brief	Not Started	No
	REAR OF NETTO FOODSTORE	BORDESLEY GREEN	0.29	Committee Resolution	Not Started	No
	395 AND LAND ADJACENT	WASHWOOD HEATH ROAD	0.11	Detailed Planning Permission	Not Started	No
	LAND ADJACENT 76	WHARFDALE ROAD	0.08	Expired Planning Permission	Not Started	No
GARRETS GREEN INDUSTRIAL ESTATE	LAND CORNER OF	BANNERLEY ROAD AND GRANBY AVENUE	0.67	Expired Planning Permission	Not Started	No
	LAND CORNER OF	LEOPOLD STREET AND STANHOPE STREET	0.19	Expired Planning Permission	Not Started	No
	ADJACENT 66	BARFORD STREET	0.06	Committee Resolution	Not Started	No
REAR OF 2 VINE STREET	LAND FRONTING	CHURCH ROAD	0.03	Expired Planning Permission	Not Started	No
	REAR OF 1202 TO 1210	COVENTRY ROAD	0.19	Expired Planning Permission	Not Started	No
		Not Available	2.11			
		Total	8.43			
		TOTAL	163.50			

Chapter 5: Prosperity for All - Employment and Economic Development Policies

General Policies and Employment Land Provision

5.1. The Phase 2 revision leaves most aspects of the policies for employment economic development unchanged from the current RSS and there was relatively little controversy about the changes proposed. WMRA stressed how the RSS had been dovetailed with the Regional Economic Strategy (RES). The iterative process between the two strategies to ensure full alignment was confirmed by AWM. WMRA also argued that not only does the strategy follow the guidance of PPG4 and PPS6 but also the emerging guidance of draft PPS4 that will in due course subsume both together with the economic aspects of PPS7. Some concern was expressed that the economic policies for rural areas that are necessary to underpin rural renaissance were not reviewed in Phase 2 but left for consideration in Phase 3, but no specific suggestions were made for necessary amendment at this stage.

5.2. There were a number of views expressed from the development sector e.g. from Goodman and the Spetchley Estate that the text is less positive and flexible than it should be, particularly with regard to the areas outside the MUAs. For our part we can see some strength to such argument in the wording of paragraph 7.8 of the supporting text to Policy PA1 and recommend a minor change at **R5.1**. For the most part, however, and in accordance with the generality of support evident at the Examination, **we consider that the Portfolio approach to the general provision of non-town centre employment that is embodied in Policy PA6 is fully reflective of the guidance in Policies EC1 and EC2 of draft PPS4.** Words such as "generally", "likely to" and "may" in describing the various categories of sites that should be included in the portfolio of locally significant employment sites do not seem to us to indicate any rigidity or inflexibility. Policies PA2-PA5 also reflect the guidance of draft PPS4 in terms of catering for high tech clusters and addressing regeneration needs, with the former also being highlighted as a justification for levels of provision in PA6A. GVA Grimley suggested that paragraph B of the policy would prevent rationalisation of QinetiQ's key site at Great Malvern through a partial mixed-use redevelopment to facilitate enhancement of the remaining core premises. However, the restrictions appear to be intended to apply to newly established sites that might be accepted to further development related to research establishments contrary to other planning policies and not to a long-established site within an urban area. WMRA, AWM and the authorities suggested that the QinetiQ aspirations at Malvern would be perfectly capable of accommodation through the Joint Core Strategy and development management processes and that the wording of Policy PA4 would not create any barrier to this. We concur with this view and find no reason to amend the policy.

5.3. The main controversy turned upon the scale of the provision that should be made as set out in Table 4 to Policy PA6A which WMRA had inserted into the RSS to comply with government guidance that the RSS should include District level figures. In initial representations GOWM indicated a concern that the figures appeared to reflect too great an

emphasis on past trends. They sought a greater relationship to housing provision. However, at the Examination GOWM accepted the thoroughness of the evidential base produced by WMRA though GOWM still suggested that were housing provision to be increased consideration would need to be given to additional employment land provision to further the creation of sustainable communities, 1 ha being suggested for every 200 additional dwellings.

5.4. A number of planning consultancies appeared to follow the original GOWM line and argue for provision calculated on a more theoretical basis. Some drew upon the SQW (CD122) and Arup (451/2) studies for AWM. Although acknowledging the revised version of the Employment Land Provision Background Paper that WMRA published in March 2009 (CD225) many did not appear to take on board the evidence contained therein. Arguments were advanced that there was no coordination between the housing and employment provision figures in the RSS. On the contrary the iterative process described in that Background Paper makes clear that in addition to past trends, existing stock, cross-boundary issues, the need for small sites and the extent of additional provision under the separate Regional categories (PA7-9), the extent of housing growth envisaged is a factor taken into account. **We therefore conclude that as a generality the 5 year reservoir figures put forward by WMRA have a sound evidential base.** It is also difficult to escape the conclusion hinted at not just by WMRA but by respondents such as CPRE, that at least some of the arguments expressed from consultants representing housing developers were more to do with seeking to justify higher housing provision than meeting employment land needs. Indeed there seemed a circularity in some arguments that sought higher employment land provision so as not to hold back buoyant aspects of the economy but also then higher housing provision so that labour requirements might be met.

5.5. AWM stressed that there should be no attempts to have a simple mechanistic formula for the level of employment land provision as so much change in employment, both down as well as up, can take place without new development and that much employment takes place either in town centre locations or outside B Class development altogether. The RES and therefore the RSS has to address a much wider range of interventions in terms of training, skills, infrastructure and many other issues to secure a buoyant sustainable economy and a closure of the GVA (Gross Value Added) gap with more prosperous parts of the UK and Europe. **We find the general arguments of WMRA and AWM on the justification for the 5 year reservoir figures to be convincing** and noted the support from the West Midlands Business Council. The Business Council also support the inclusion of reference to premises in the RSS, notwithstanding opposition from Redditch BC. We agree with WMRA that securing re-use of existing premises and providing premises where there are market deficiencies are within the scope of Regional Development Agency (RDA) and LPA responsibilities and rightly therefore referred to within a spatial plan.

5.6. There were some arguments that particular District figures should be adjusted for reasons expressly related to employment site issues but we address these after looking at the total indicative provision figures for the full plan period. There was much more widespread and sustained

attack on these total indicative figures for employment land provision over the plan period with some planning authorities as well as developer interests expressing concern that simply to multiply the five year reservoir figures by 3 rather than 4 cannot be a logical process. Although we think that a number of respondents do not fully understand the reservoir concept, seeing it as a 5 year provision figure instead of the intended buffer stock that should always be available to ensure that economic development would not be inhibited, nevertheless, as the reservoir calculations are derived from expectations of need over a five year period, we share these concerns.

5.7. WMRA argued that there is a rationale for only using x3 rather than x4 because recent rates of development taken account of in calculating the 5 year reservoirs had been exceptionally high and that it is important not to bring forward greenfield land that might not be required. This could involve both sterilising that land from other productive use and undercutting urban renaissance efforts utilising PDL. Re-use of good quality employment land safeguarded under Policy PA6B could also minimise the need to make new allocations. They also pointed out that the figures are intended to be indicative. LPAs would be able to review the figures in their Core Strategy process. In many areas, for example Staffordshire other than Tamworth and Stafford, allocations already exceed likely requirements over the full plan period. The Assembly denied that the x3 arose simply from a desire to avoid changing the figures after the plan period was rolled forward from 2021 to 2026. CPRE shared the concern to avoid premature and possibly unnecessary take up of greenfield land, fearing that the reservoir approach would simply mean that there would be ever greater land-take in areas of high demand.

5.8. We were not convinced that these issues justify departing from the logic of applying a x4 basis for the total indicative requirement over the 20 year plan period. In this case we consider that it is the Assembly and those planning authorities that support them that are misunderstanding the consequences of making the change sought by so many respondents. It should not mean that new land would need to be allocated if new land were not required, nor that there would be unrestricted development in areas of high demand as the reservoir calculations are made on a 'policy-on' basis. If there are authorities that already have a supply in excess of that likely to be needed over the plan period, then they would not need to make new provision whether a x3 or x4 basis is applied, unless they wished to re-allocate some of the existing provision for other purposes such as housing. In our view the position for employment land would be, and indeed should be, broadly comparable to that for housing land. Clearly, the first 5 year reservoir land would need to be identified as would a comparable extent of land to enable that reservoir to be topped-up as it is used. This would be very much comparable to the 10 years' identified supply required for housing land in PPS3. Beyond this, authorities might wish to give some general indication of where further land, if required, might be located, for example as part of sustainable urban extensions, so as to avoid need for premature reviews of Core Strategies. However, **if the rate of depletion proved less than anticipated as a consequence of the recession or if the reservoir could be topped up through re-use of vacated industrial sites, such windfalls might**

well obviate the need to identify further land during the plan period. Conversely, where the reservoirs became taken up more quickly than anticipated there would be clear policy backing for maintaining the flow of sites necessary to secure the buoyant economy that is sought. In short, x4 with appropriate phasing appears to us to be the sound and rational basis on which the RSS should go forward and we recommend accordingly at **R5.5** and **R5.6**.

5.9. Once this change is made it would seem to cover all the specific arguments raised as to the adequacy of provision, particularly as the paper prepared by AWM on the "Economic Downturn and its Potential implications" (451/7) highlights the severity of the recession on the economy of the West Midlands. More specifically looking at Redditch, the Borough Council drew attention to the work of GVA Grimley on an employment land study for the Borough and sought amendments to increase provision to reflect its findings. However, the x4 indicative provision with appropriate cross-boundary footnotes would result in an indicative requirement greater than those arising from this study. Or again the arguments raised at Worcester in relation to the consequences of the intended Worcester Bosch relocation and the possibility that recent rates of development have been depressed as a result of particular circumstances appear to be fully met both by the specific reference to the particular relocation recommended in Chapter 8 and by the adoption of x4. The express endorsement of both RLS and their expansion in North Warwickshire later in this Chapter, plus a note concerning cross-boundary provision for Tamworth, when added to the adoption of x4 also appear to meet the concern of Tweedale for I M Properties in relation to North Warwickshire.

5.10. Concerns were raised that the provision for some Districts appeared excessive. CPRE argued that too high a long term requirement may lead to unnecessary release of greenfield sites and Green Belt. However, we see no reason to dispute the basis of the "reservoir" figures which is explained in CD225, and which is agreed between WMRA and AWM and appears to be generally accepted by the local authorities. **The rolling 5 year reservoir approach will help to ensure that land is not brought forward ahead of need** and in the absence of an employment land equivalent of paragraph 6.25 (which in any case we recommend should be deleted) any proposal to take additional land out of the Green Belt, other than in the specific cases in the Spatial Strategy policies which we recommend, would need to comply with the strict requirements of PPG2. We do not generally recommend making adjustments to the figures for employment land as a consequence of our recommended changes to housing provision figures given the indicative nature of the employment land provision figures and given the strictures from AWM cautioning against seeking to match housing and employment land with too great a degree of precision. Finally, Telford and Wrekin Council (TWC) sought to use the x3 ratio as a justification for proposing re-allocation of some of their employment land to either mixed development or housing as x3 would only lead to an indicative requirement for 150 ha whereas they currently have 200 ha allocated. While adoption of x4 would not provide the explicit statistical justification for the course sought by TWC, we cannot see that there would be anything to prevent the Council from

proposing some re-allocation in their Core Strategy Review and without necessarily at that stage allocating replacement employment land given the phasing for the provision of such land that we endorsed in the previous paragraph. We consider further concerns to be able to be more flexible over the provision of out of centre offices that were voiced by Telford, Cannock Chase and Staffordshire County Council as well as developer interests in relation to Policy P13A.

5.11. Before moving on to consider Policy PA6B, we should note that the format of the RSS should be improved in relation to presentation of Policy PA6A. Key definitions that are required to understand the policy are contained in footnotes on page 96 and in paragraph 7.36 on page 100 and the footnotes to Table 4, which contain a mixture of generalities and precision, appear on page 97 two pages ahead of the table to which they refer. The former footnotes and paragraph 7.36 should be brought together within the supporting text after paragraph 7.34 and the footnotes to the table should be clarified and inserted on a consistent basis following the table. More specifically, WMRA pointed out that footnote (e) to Table 4 referring to a 50% share of Warwick University expansion was in error and should be removed, which we accept. We recommend accordingly at **R5.2, R5.3, R5.4** and **R5.7**.

5.12. Policy PA6B on the protection of employment land received widespread support, albeit not without some concerns being expressed. Developer interests sought greater flexibility while CPRE did not wish to see employment land that would never be required continuing to be sterilised and thereby leading to loss of additional greenfield land for other purposes. The Policy was introduced at the request of AWM and particularly supported by both AWM and the West Midlands Business Council and as a generality not opposed by GOWM. It is the final paragraph of the Policy that attracts particular concern as to inflexibility. In this there is a requirement that any redevelopment for non-employment purposes of a site over 10 ha should only take place through the development plan process. GOWM object to this particular provision as do TWC, though we were not able to draw out details of any particular site the Council may have had in mind. A number of development interests also focus on this particular provision. WMRA and Birmingham City Council sought to defend the provision by drawing attention to the success in securing adoption of the Longbridge AAP that was hung directly off the existing RSS in only 3 years and which includes not only retention of some car manufacturing but also a RIS and other employment potential as well as housing. Attention was also drawn to the success in securing an employment redevelopment of the Peugeot site referred to above. Both show how the policy can be effective.

5.13. The Assembly also stressed the large scale of a 10 ha site but that the policy would otherwise enable a Core Strategy DPD to set an alternative threshold. We do not regard the latter point as a good one as it would appear to enable any LPA to bypass the policy which should not be so if it is of importance. As to the scale and the success at Longbridge and Ryton, we regard these as points in favour of retaining the essence of the policy, but on balance we consider that this paragraph should be reduced to the status of supporting text in a slightly more flexible form and so recommend at **R5.9**.

5.14. There remains the question of whether the remaining substance of the policy, which requires a strictly sequential process and which has also been challenged, is too inflexible. It is pointed out that Policy UR1B inserted into the RSS by the Secretary of State to cover the Black Country does not have such a strict sequential formulation. WMRA endorsed the continuation of that policy as Sub-regional strategy for the Black Country and we so recommend in Chapter 8. Consequently, we consider that the general Policy PA6B should be amended into a broadly comparable form, bearing in mind that Policy PA6B is intended to operate as a policy in a development management context and not just to guide the preparation of DPDs. The policy as amended in **R5.8** would still provide strong protection for good quality employment sites and require employment land reviews as part of the evidence base for Core Strategies. While prioritising retention of at least some employment use on the previous sites where necessary, it would enable parallel consideration of the merits of alternative developments.

Regional Investment Sites (RIS) - Policy PA7

5.15. The approach of Policies PA7 on Regional Investment Sites (RIS) and PA8 on Major Investment Sites (MIS) was generally supported. Although there was a concern to clarify that the employment land provision under Policy PA6A is over and above any Regional requirements identified under Policies PA7-9, this point will be attended to under the clarification of footnotes that we recommend in paragraph 5.11 above.

5.16. In terms of policy content both WMRA and GOWM accepted that Policy PA7 does allow B1(a) Office development on RIS, though this was not thought to be inconsistent with the preclusion of large-scale speculative office development which can be more appropriately located in town centres as referred to in paragraph 7.37. The success in securing town centre headquarters office developments in the centre of Coventry testifies to the sense of making this distinction. We endorse the latter point as consistent with PPS6 and emerging PPS4 and accept that in general the restriction of out of centre office developments sought under that government guidance would be maintained by the strict rationing of RIS/MIS because such locations would only be able to be promoted where expressly identified in the RSS.

5.17. Goodman and Liberty Land Investments as the owners of Birmingham Business Park (BBP) and Blythe Valley Business Park (BVBP) respectively urged greater flexibility in the application of Policy PA7 to facilitate provision of ancillary development on Business Parks so that they might become "Third Generation" parks able to attract the highest calibre of occupants. WMRA did not oppose the concept of genuine ancillary development. They accept that hotels, restaurants and limited local shopping facilities, health & fitness centres and crèches would fall within such definitions provided that the scale would not be such as to encourage their promotion as destinations to rival town centres. Attention was drawn to the acceptance of some of these facilities at or adjacent to the existing Business Parks. Where the line was drawn was over acceptance of residential development. This is a matter covered more fully in Chapter 8 of our report, but we accept the Assembly and RDA argument that it would not be possible to link residential occupation and on-site