

Walsall Council

WALSALL EMPLOYMENT LAND REVIEW 2012 UPDATE



CONTENTS

1	INTRODUCTION	1
2	ECONOMIC AND PROPERTY MARKET CONTEXT	3
	Overview.....	3
	The Current Property Market.....	5
	The Viability of Development.....	9
	Conclusions	10
3	POLICY CONTEXT	13
	Introduction.....	13
	National Policy.....	13
	Local Policy	14
	Conclusion.....	21
4	SUPPLY AND DEMAND OF EMPLOYMENT LAND.....	23
	Planned Supply	23
	The Demand-Supply Balance to 2026.....	24
	The Five-Year Land Reservoir.....	26
5	CONCLUSIONS	29
	Area and Site-Specific Recommendations	29
	The Wider Picture.....	30

APPENDICES

Appendix 1 Definition of Industrial/Warehousing Land Uses

Appendix 2 Areas and Sites Audit - Comparison with Core Strategy Evidence Base

Appendix 3 Readily Available Land

1 INTRODUCTION

- 1.1 This employment land review was commissioned by Walsall Council, as part of its planning evidence base, to help inform the Council's policies and decisions on employment land – which means land for industry and warehousing¹. The study will feed into the Borough's Development Plan Documents on Site Allocation, Development Management, Area Action Plans and its Local Economic Assessment.
- 1.2 This edition is a minor update of our 2010 report. The update is warranted to take account of developments and changes since November 2010.
- 1.3 The majority of the changes relate to the development sites as opposed to policy or context. We have not updated the policy review or policy context; partly because the primary planning document the Core Strategy has not changed but also because new documents (e.g. the National Planning Policy Statement) are currently in draft. Walsall will update this section at a later date.
- 1.4 The Council aims to publish the Sites and Allocations Issues and Options Document, and has already issued a preliminary call for sites to that effect. This edition of the ELR, along with updated SHLAA (see below) is intended to form part of the evidence base for the Sites and Allocations Document. It provides a major consideration in the assessment of proposals affecting industrial land.
- 1.5 As with our 2010 study this update indicates where land should be retained in its existing use, developed or redeveloped for employment, or considered for release to other land uses. In planning for employment land, the Council's overarching objective is to ensure that, as far as possible, Walsall's economy is not held back by lack of land or premises for industry in the coming years. A particular objective is to make as much progress as possible towards the transformation envisaged in the Black Country Joint Core Strategy, whilst ensuring that good quality sites and premises are not lost in a piecemeal fashion to development for other uses, notably housing.
- 1.6 The 2010 study has been prepared in conjunction with Walsall's SHLAA. This is also being updated by the Council. (The first edition of the ELR was published after the SHLAA because of the need for the SHLAA to form part of the evidence base for the Core Strategy).
- 1.7 The study is consistent with, and derives from, the strategic employment land evidence base prepared by GVA Grimley for the Black Country Core Strategy. But the study is more detailed and area- and site-specific than the GVA evidence base. There are a few cases where our site or area evaluation is different from the GVA assessment.

¹ As defined for purposes of planning in the West Midlands, the term 'employment land' excludes other land uses that provide jobs, such as offices, retail, leisure and public services.

- 1.8 Planning policy for Walsall is currently provided by the Unitary Development Plan (UDP), adopted in 2005, the Black Country Core Strategy, which was adopted in February 2011, and, at the time of writing, the still-extant Regional Spatial Strategy (RSS). The Core Strategy provides quantitative targets and qualitative criteria for the provision of employment land in the Borough as a whole to 2026, but it does not contain site-specific policies. Walsall's employment land review will show what the Council should do, in terms of planning policies and decisions, to manage the employment land stock according to the employment land policies in both the UDP and the Black Country Core Strategy.
- 1.9 Below, Chapter 2 briefly profiles the local economy and property market and draws implications for employment land. Chapter 3 sets out the current and emerging planning policies which set the agenda for our analysis. Chapter 4 assesses the supply of land identified for employment, both in terms of quantity and qualitative mix, to see if current plans supply enough land to meet the requirements set out in the Core Strategy. Finally Chapter 5 summarises our conclusions and provides our recommendations.
- 1.10 This main report is supported by a detailed areas and sites audit (Volume 2) which assesses the Borough's employment sites individually and makes a policy recommendation on each. The supply figures in Chapter 4 are based on this detailed analysis.

2 ECONOMIC AND PROPERTY MARKET CONTEXT

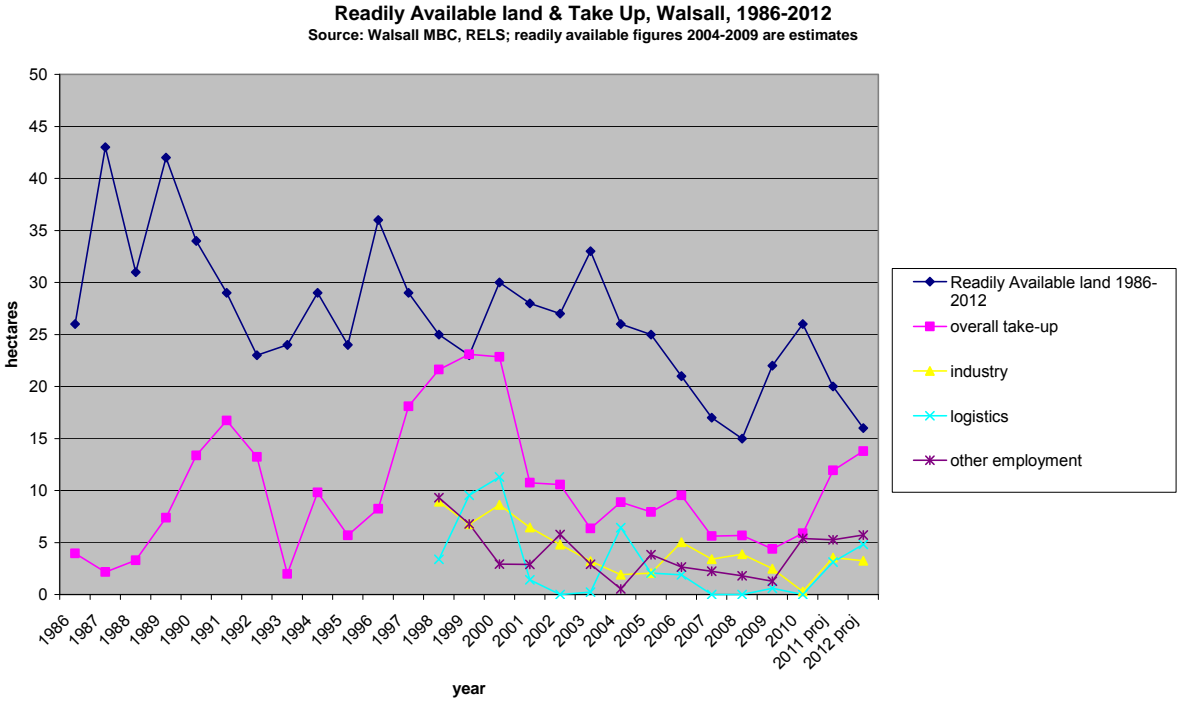
- 2.1 This chapter briefly profiles Walsall's local economy and property market and draws implications for employment land policy. Below, the next section is a broad overview of Walsall's current situation and future potential, provided by the Council's planning department. The following section focuses on current property market conditions, to assess the prospects for commercial property development in Walsall.

Overview

- 2.2 Walsall is an industrial manufacturing town. It historically specialised in locks and leather making, and a variety of smaller-scale engineering uses. The Aldridge-Brownhills area, which came into the Borough as a result of 1970s local government reforms, was originally noted for mining, various other forms of extraction and brick making, but is now largely residential - although Aldridge does have the largest single industrial concentration in the Borough. The Borough also has a large amount of Green Belt, which is subject to planning policies that restrict development. Virtually all of its employment land supply will in the coming years will be sourced from brownfield land, much of which carries a legacy of poor ground conditions.
- 2.3 Walsall Borough has seen a steady decline in manufacturing employment. Between 1998 and 2008 it lost almost half of its jobs in the sector. However, the Borough has tended to specialise in a diverse range of smaller-scale manufacturing industry, so it has tended to avoid the fate of some other manufacturing towns whose economies were precariously based on a group of large failing industries, such as steel, cars and shipbuilding. This protected the town from the worst of previous manufacturing recessions, with unemployment lower than Birmingham, Sandwell and Wolverhampton (though it was one of the worst hit in the country in the 2008-09 recession). But this has resulted in a lack of large sites, vacated by industry, to offer for inward investment - except in the Darlaston area, which is part of the Black Country's central heavy industrial belt - and these are mostly contaminated.
- 2.4 Walsall's largest sites are the former IMI works in Walsall and Bloxwich, which are severely contaminated. There is also a long tail of vacant sites below 2 ha, many of them constrained by housing that was originally built to accommodate the industrial workforce. The best quality vacant sites are those at M6 Junction 10, and on Reedswood Way. Good rates of investment have been forthcoming in the Wharf Approach area of Aldridge, and on the Black Country Route, where Poundland's national distribution HQ is located. But the Borough's industrial land offer is generally poor, and this has constrained take-up rates, particularly over the last 10 years or so.
- 2.5 Given that the town, and the particular skills pool of local residents, still rely heavily on manufacturing, this is of concern, and every effort needs to be made to protect and improve the portfolio of vacant and occupied stock in the Borough, except where such vacant stock is plainly unsuitable for industry (these sites are identified later in this report). The land supply has to cater not just for upscale industrial uses, as in the transformation envisaged in the Core Strategy (see Chapter 3 below), but

for the more common workaday uses, which are particularly prevalent in the Borough, and employment-providing services such as scrapyards, waste management uses, haulage, depots and storage.

- 2.6 Walsall's economy is fragile. The Borough specialises in a group of industrial activities that have been in long term decline, and has not been able to diversify its economy towards high value service industries. The result is persistent high unemployment and high rates of deprivation, especially in the poorer, western half of the Borough.
- 2.7 However, as a manufacturing town, there is a strong international export-orientated component, and it has diversified within the manufacturing sector in the direction of the automobile components industry and other investment goods for which there is continuing strong demand from international sources, to some extent protecting itself from the recent domestic turndown in manufacturing orders. The recent JLR investment announcement, where the company is investing a large new manufacturing base at I54 in South Staffordshire, next to the Borough, is likely to have beneficial spin off effects for Walsall manufacturing companies.
- 2.8 The Borough's manufacturing sector is very important to provide wages which can be spent on local consumer services, in turn employing local people. It is also often forgotten that the manufacturing sector provides the lion's share of national exports. In theory therefore, the town ought to be well placed to take advantage of any change in emphasis in national economic management away from consumption towards increased investment and exports as components of economic growth. And indeed there have been recent signs of a recovery in manufacturing investment in Walsall, as export orders have risen on the back of a weak sterling. Large manufacturing firms such as Castings plc in Brownhills and Chamberlin & Hill in central Walsall are taking on workers to cope with demand from overseas. According to the Business Register and Employment survey data, employment in manufacturing rose in Walsall between 2009 and 2010 by 0.8%, compared with an overall decline across England and Wales. Take-up has recently risen for B1/B2/B8 uses, B8 logistics and other uses typically located on employment land, and the development pipeline is buoyant in the short term. The chart shows the trend in take up and the amount of readily available land for industry over recent years, with the projection to 2012/13..



2.9 But there are still reasons to be cautious. The weak rate of sterling may not persist much longer in view of mounting problems in the Eurozone, still Walsall’s largest overseas customer, and there are signs that the increase in manufacturing growth, which up to now has outpaced the economic recovery, is going into reverse. And the structure and legacy of industry continues to constrain efforts to attract modern industry, whilst making it difficult for existing firms to expand in situ. Walsall has many companies that are forced to operate at more than one site because of the lack of land available of a size that enables them to consolidate and expand. There have been recent cases where investment has been lost to the Borough because of this. For any recovery to continue, it is vital that the land and property portfolio be protected and improved.

The Current Property Market

2.10 In this section we use property market evidence to assess the prospects for future commercial development in Walsall. In particular, we consider how far the market is likely to deliver the objectives of the Black Country Core Strategy - which aims for a wide-ranging upgrade of Walsall’s industrial stock, in which the best sites are developed and redeveloped for high-quality accommodation to attract high-value occupiers. We briefly profile Walsall’s stock of industrial/warehouse floorspace, and go on to consider the demand for floorspace, the current supply and the viability of development.

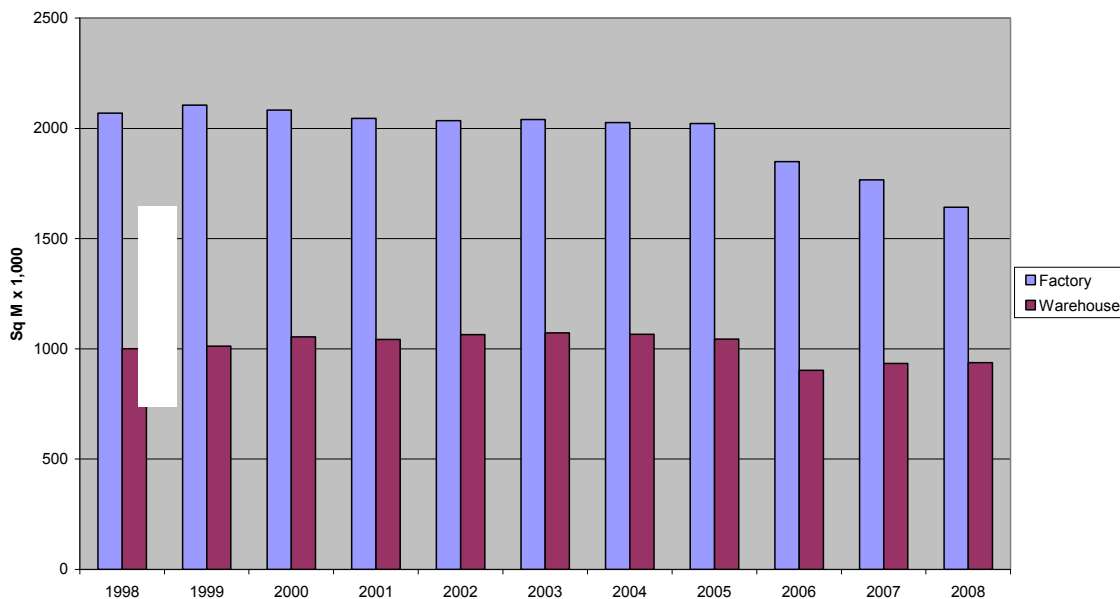
The Property Stock

The Quantity of Floorspace

2.11 In 2008, the last date for which statistics are available, according to the CLG floorspace statistics Walsall had 1,642,000 sq m of factory floorspace stock and

937,000 of warehouse floorspace stock. The corresponding figures in 1999 were 2,105,000 sq m and 1,013,000 sq m respectively. Thus in the 10 years to 2008 the Borough lost 22% of its factory floorspace and 8% of its warehouse floorspace. Virtually all these losses occurred in the last three years of the series, since 2005 (Figure 2.1), the result of employment land being redeveloped for housing and possibly the demolition of vacant buildings to avoid the empty property rate, which was introduced in 2008.

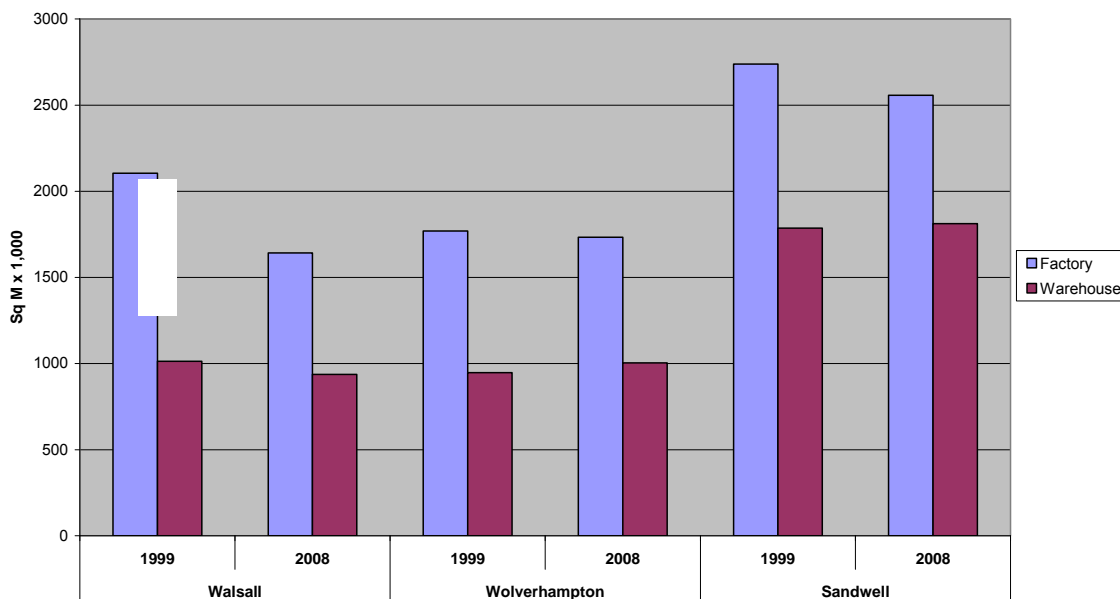
Figure 2.1 Factory and Warehouse Floorspace in Walsall, 000 sq m



Source: Communities and Local Government/Valuation Office Agency

2.12 The two neighbouring boroughs of Wolverhampton and Sandwell also lost factory floorspace over the decade to 2008. But their losses were proportionally much smaller, at 3% and 7% respectively, and warehousing floorspace increased fractionally in both Boroughs, by 6% and 2% respectively (Figure 2.2). In terms of strategic location, neither Sandwell nor Wolverhampton have any particular advantages over Walsall, so it is not obvious why they should have done so much better in terms of floorspace change. We will return to this question in our conclusions.

Figure 2.2 Factory and Warehouse Floorspace in Walsall and Neighbouring Boroughs, 000 sq m



Source: Communities and Local Government/Valuation Office Agency

The Quality of the Stock

- 2.13 The District of Walsall straddles the M6 motorway at Junction 10 and stretches from the suburban fringes at Brownhills and Aldridge to the north and West to the heart of the Black Country at Walsall, Darlaston and Willenhall. The majority of industrial land and floorspace is concentrated in these Black Country towns, where industry remains an important part of the local economy, although it has been shrinking for 30 years or longer.
- 2.14 Further to the decline of manufacturing, the District's stock of industrial floorspace has seen increasing vacancy rates in certain locations, particularly where the type of property available is unattractive to high-quality modern occupiers. While there is demand for industrial floorspace in the District's best industrial locations, with easy access to the M6 and the Black Country's major routes, much of Walsall's industrial stock is incapable of meeting this high-quality demand. Due to the way industry originally grew during the Industrial Revolution, high concentrations of low-quality floorspace are found very close to the town centres of Walsall and Willenhall, and many industrial areas are dotted around the District in surroundings which are now largely residential. Much of this low quality space, which historically would have been occupied by the traditional industries of the Black Country, is now occupied by a mixture of quasi retail, motor-trade and recycling/scrap metal operations seeking cheap low quality space
- 2.15 Because many of the District's industrial areas are close to town centres and residential areas, access to them is often restricted and heavy goods vehicles have to pass through largely residential areas. The industrial areas at Willenhall Central, Ashmore Lake and immediately to the north of Walsall Town Centre are examples

of relatively poor access, although the first two remain well occupied nonetheless. Aldridge however has done very well over the years in attracting manufacturing investment. Elsewhere in the Borough, sites that are well located to the road network are blighted by lack of infrastructure, and the dereliction and contamination left behind by earlier heavy industrial uses. A prime example is Darlaston, which offers a strategic redevelopment opportunity close to the M6, with the potential to attract high-quality demand, but suffers from a degraded environment, large swathes of severely contaminated land and an inadequate local road network. At present the area is largely unattractive to occupiers and the cost of clear-up means that redevelopment is in many cases not viable.

- 2.16 In summary, employment land in much of Walsall is blighted by industrial dereliction, bad neighbour industries, contamination and poor access. These problems should be addressed if the Borough's key employment areas are to take advantage of their strategic locations to attract new developers and new occupiers to Walsall.

Demand

- 2.17 LSH estimates that over the 5-10 years to 2009 the annual take-up of industrial/warehouse floorspace² in Walsall averaged around 60,000 sq m. The bulk of this space has been of relatively low quality and in small units.
- New and refurbished space accounts for only 14% of total take-up since 2004, and just 2% of total take-up in 2009.
 - 72% of space transacted has been in units of less than 1,000 sq m.
- 2.18 The high share of poor-quality floorspace is partly explained by local market realities. Many business occupiers in Walsall seek such space in order to keep property costs to a minimum. These low-value occupiers will not be able to afford the new high-quality sites which Walsall proposed to develop in future. If too much of the Borough's existing low-quality floorspace is lost, either to high-quality development or to alternative uses, the displaced companies will have difficulty finding suitable accommodation and risk going out of business.
- 2.19 Geographically, take-up has been concentrated around Walsall town centre, Ashmore Lake, Aldridge and Leamore. In contrast, Darlaston has seen few transactions: despite its excellent strategic location and market potential, the area is unattractive to occupiers and developers due to its degraded environment, contamination and inadequate access.
- 2.20 Floorspace take-up in Walsall has been predominantly from local businesses. Inward investment has been very much the exception and has generally consisted of strategic distribution (logistics) facilities, including City Link in on the Black

² The figures in this section relate to the take-up of floorspace by occupiers. As is customary in property market analysis, these take-up figures are gross: they count businesses moving into properties, but make no deduction for businesses vacating properties. Floorspace take-up should not be confused with the take-up of employment land (otherwise known as development) which is discussed elsewhere in this report.

Country Route and TK Maxx national HQ to the north of Walsall town centre. Due to the lack of new development and the low quality of the existing stock in Walsall, footloose occupiers tend to gravitate to other parts of the Black Country, where good-quality floorspace is more readily available. One recent example is Pallet Track's 2009 deal to take some 25,000 sq m at Titan 10 in Bilston, Wolverhampton. To attract more high-value occupiers of this kind, Walsall would have to offer higher-quality floorspace at its most strategically accessible location, which is Darlaston.

Supply

- 2.21 Walsall, despite being as well located as its Black Country neighbours, has seen few new large schemes. New schemes in Walsall have been aimed at the smaller, locally based occupier:
- Walsall Enterprise Park has been under development since 2001.
 - The Wharf Approach in Aldridge has been developed over the last ten years as a high quality business destination.
 - The biggest single manufacturing development was Acerinox, the steel stockholders, in Darlaston
 - After the Black Country Route associated boom, the largest logistics facility was the 6.4ha UK distribution centre for TKMaxx in North Walsall.
- 2.22 As well as a lack of floorspace for immediate occupation, particularly for higher-quality and larger properties, there is also a distinct lack of large premises being marketed across the Borough. A survey of local agents by the Council in October 2011 found around 160,000 sqm being marketed, consisting of about 150-200 properties. Most of this was small scale premises, with less than 20 cases being above 2,000sqm. Aldridge had the highest total, and generally the best quality range, at around 71,000 sqm, with Bloxwich and Darlaston are extremely poorly provided for with only 10,000sqm or so, as was Walsall itself at 33,000sqm.
- 2.23 The largest single premises available was the former GKN works in Aldridge at 32249sqm. The next largest was 12438sqm, also in Aldridge. Walsall, Bloxwich and Willenhall were badly provided for in terms of large properties.
- 2.24 This suggests that there are industrial development opportunities (this is confirmed by our analysis of sites in Chapter 5). Darlaston, for example, clearly has huge development potential. But the size structure of the properties on offer generally does not meet the requirements of inward investors or expanding local companies. Also, the reason why most development sites are not being marketed is that, due to the cost of decontamination and upgrading, many are not viable for development without public sector support. In the next section we look at this issue more closely.

The Viability of Development

- 2.25 At the height of the market, a prime rent £50 per sq m was achievable in the Black Country for the best industrial floorspace, which means new space in the most sought-after locations with good access to the main road network and hence the M6 motorway. This rent probably does not vary across the Black Country area,

although for Walsall there is little rental evidence because no prime space has been on offer for some time.

- 2.26 At the time of our last report market conditions had sharply deteriorated and were forecast to fall even further in the short term (2009/10).
- 2.27 However there are now some signs that the market may be strengthening. More recent agent research suggests improved demand driven by the manufacturing sector; including the automotive industry.
- 2.28 There is also an emerging shortage of high quality stock; very little new stock has been developed in recent years so any major takeup of space can dent the pipeline of supply.
- 2.29 Although rental growth remains subdued most agents are more optimistic than in 2009 and now forecast some growth from 2012 onwards.
- 2.30 The Council also reports this market optimism is translating into demand within Walsall. The Borough is well placed to benefit from the strengthening manufacturing sector given the pool of skilled local labour and firms who are well placed to expand production.
- 2.31 If the necessary investment were forthcoming, and market conditions continue to improve, Walsall would certainly become a far more attractive proposition to both occupiers and developers. Significant swathes of employment land at Darlaston and the IMI site could be developed for logistics occupiers attracted by convenient access to the M6, as well as existing Black Country occupiers seeking to upgrade. The new Enterprise Zone may further enhance the attractiveness of the Borough for renewed investment.
- 2.32 It would also create the scope to attract a major inward investor to Walsall should the opportunity arise. As previously mentioned there is a lack of quality floorspace on offer across the board, and particularly for units in the 2,000-5,000 sq m range, for Black Country/West Midlands occupiers. There is also a lack of larger units aimed at logistics occupiers, for which there will be greater demand as economy and the retail sector recover.

Conclusions

- 2.33 As discussed in Chapter 3 below, the Black Country Core Strategy proposes that the best industrial sites be upgraded to provide high-quality accommodation that attracts new, high-value occupiers, while much of Walsall's existing local-quality industrial stock is released for housing. What does the market analysis tell us about the likely success of this strategy?
- 2.34 First, the analysis confirms that there is potential demand from new, high-value occupiers to locate in Walsall, specifically from the logistics sector and for the Borough's most accessible sites, close to the M6. Space at these best sites may also be in demand from local occupiers looking to upgrade. This demand will increase as and when the economy recovers. But at the moment there is very little high-quality floorspace, either on the market or in the pipeline, ready to meet it.

- 2.35 Secondly, we have shown that in the short term at least there is little prospect of new industrial development to fill this gap. The reason is not lack of sites designated for industry, but the fact that developing these sites is often not commercially viable, due to inadequate infrastructure and the legacy of contamination and dereliction left by past generations of economic development – ie, the lack of readily available sites. Unless and until market conditions improve dramatically, to attract new higher-quality occupiers to Walsall will require public sector money to cover these abnormal development costs.
- 2.36 Between our 2010 report and this update there are some signs that local firms, such as Heathyards at Maybrook, Brownhills and Castings at Newtown, Brownhills who are based in Walsall but operate at other locations) are overcoming viability issues and expanding onto development sites in Walsall when they could easily transfer production elsewhere. Whilst it may be too early to draw firm conclusions from these limited examples over the past 18 months or so, it emphasises the need to be cautious when looking to release sites employment sites to other uses, and potential optimism for the future.
- 2.35 Thirdly, our analysis reinforces the message of the Core Strategy that the loss of employment land should be carefully controlled and managed. We have noted that, although the market for local-quality accommodation has shrunk massively over the years, it remains substantial. This why industrial areas north of Walsall town centre and at Ashmore Lake, for example, remain well occupied. Low-value occupiers, who provide the mainstay of demand, will not be able to afford the new high-quality sites which Walsall proposed to develop in future. If the reduction in land supply runs ahead of the reduction in demand, or if the sites retained for employment become unviable or unattractive to local occupiers, these firms may be forced out of Walsall or forced out of business and local jobs may be lost.

3 POLICY CONTEXT

Introduction

- 3.1 Until recently, local planning was required to conform to two higher tiers of policy: national policy, contained in Planning Policy Statements (PPSs), and regional policy, contained in the Regional Spatial Strategy (RSS). The RSSs are still extant but the Government intends to revoke them through the Localism Act. Below, we consider these in turn, to see what they require of Walsall as regards planning for employment land.

National Policy

- 3.2 On 23rd March 2011 the Coalition Government published a statement entitled “Planning for Growth”, with the aim of helping to rebuild the UK economy after the severe recession. This required local authorities to support enterprise and facilitate housing, economic and other forms of sustainable development. In particular, they should:
- (i) consider fully the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession
 - (ii) take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing
 - (iii) consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity)
 - (iv) be sensitive to the fact that local economies are subject to change and so take a positive approach to development where new economic data suggest that prior assessments of needs are no longer up-to-date
 - In determining planning applications, local planning authorities are obliged to have regard to all relevant considerations. They should ensure that they give appropriate weight to the need to support economic recovery, that applications that secure sustainable growth are treated favourably (consistent with policy in PPS4), and that they can give clear reasons for their decisions. .
- 3.3 National planning policy for employment and the economy was comprehensively renewed through publication of Planning Policy Statement (PPS)4 in December 2009. PPS4 remain in force for the time being, although it is likely to be replaced by the National Planning Policy Framework in due course.
- 3.4 Unlike earlier national policy documents, which dealt separately with different economic land uses, PPS4 aims to establish a unified approach to planning for the whole economy. Its main messages include:
- Planning should ‘positively and proactively’ support sustainable economic growth.

- Development plans should aim to provide land to meet business requirements, and they should be informed by robust evidence bases that ‘understand both existing business needs and likely changes in the market’.
- Plan policies should also be flexible enough to accommodate unexpected demands and ‘allow a quick response to changes in economic circumstances’.
- Plans should plan positively for clusters or networks of knowledge-driven or high-technology industries and for strategic distribution.
- In planning for economic land uses, development plans should seek sustainability objectives that include regeneration of deprived areas, a high-quality environment, re-use of previously developed land, sustainable travel and efficient use of infrastructure.
- Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of need. If there is no reasonable prospect of a site being used for its allocated economic use during the plan period, the allocation should not be retained and other uses should be considered.

Local Policy

Introduction

- 3.5 Walsall’s Local Development Framework is currently made up of the adopted UDP and the Black Country Core Strategy, covering the four Black Country authorities. The Core Strategy sets the strategic framework for all the Black Country authorities’ DPDs such as Walsall’s Sites and Allocations Document that will replace the UDP..
- 3.6 The saved policies of the UDP remain in force until they are replaced by policies in the new LDF – which will happen gradually in coming months and years, as different DPDs are adopted. Below, therefore, we first discuss these UDP saved policies. We then go on to consider the emerging Core Strategy, which is the first component of the LDF.

The Unitary Development Plan

- 3.7 The Walsall Unitary Development Plan (UDP) was adopted in 2005. But Core Strategy, policies EMP1-3 and TRAN4 have replaced paragraphs 4.1 and 4.2-3 of the UDP and UDP policies JP2 and JP3.
- 3.8 Employment land is dealt with in Chapter 4 of the UDP, headed Jobs and Prosperity. Supporting text in that chapter, which is not part of the saved policies but explains the rationale for these policies, reads in part:

‘The Council has established the following policy aim:

To boost jobs and prosperity in the Borough by providing enough land of the right quality to meet the full range of employment needs and by promoting the enhancement of existing employment areas.

The policies in this Plan are designed to achieve this by satisfying the Borough’s needs for investment and employment, particularly in the manufacturing, distribution

and service sectors. It should be noted, however, that since most service sector employment will be concentrated in centres this is dealt with mainly in Chapter 5: Strengthening Our Centres. The focus of this chapter is, therefore, on industry and distribution, and those service activities which support them...

Manufacturing creates wealth in the Borough and directly provides 38% of jobs. There are few elements of the economy which are not at least indirectly dependent upon it. The economy of the Borough relies heavily on a narrow band of low skill, low gross value-added [GVA] activities which are threatened by competition from low wage economies. However, in recent years, GVA in Walsall has been rising as manufacturing productivity has increased. Further inward investment is needed to help continue diversification towards higher skill, more knowledge-based, higher GVA activities.'

3.9 This strategy is translated into seven UDP employment land policies as follows:

- Policy JP1 allocates a series of new development sites to employment uses.
- Policy JP2 says that the Council will continue to work with partners to remove constraints to the development of employment sites.
- Policy JP3 says that where land or buildings have potential to be served by rail the Council will encourage their use for activities incorporating rail freight.
- Policy JP4 sets out proposals for two important development sites, East of M1 Junction 6 and James Bridge (the former IMI site).
- The next three policies identifies a hierarchy of employment sites as follows:
 - *Core employment areas (Policy JP5)* are identified for 'core employment uses', defined as use classes B1b, B1c, B2 and B8 (research and development, light industry, general industry and storage/distribution). Policy JP5 states that, where windfall sites or buildings come up for redevelopment or re-use in these areas, they will *normally* be safeguarded for these uses. Other uses will only be permitted in these areas either to meet a need which cannot be satisfied elsewhere in the Borough or if 'the range and quality of employment opportunities would be significantly increased'.
 - *Best quality sites (Policy JP6)* are safeguarded for core employment uses and development featuring high-quality design and landscaping. Policy JP6 does not allow any exceptional cases where houses or other uses could be allowed. It relates to sites that were vacant when the plan was being prepared. Since then, high quality development has been forthcoming at Walsall Enterprise Park, Wharf Approach/Anchor Brook, and Green Lane (TK MAXX).
 - *Other employment areas (Policy JP7)* are safeguarded for core employment uses together with a restricted range of other uses, including for example car showrooms, scrap metal/recycling/waste disposal, limited retailing and builders' merchants. The policy does not name specific sites, and it provides for the transfer of land from employment to other uses 'in exceptional circumstances' – where the use does not conform with other uses around it (for example, where housing surrounds or constrains the use), or where it is

not located well for the needs of modern industry. Cases like this would include poor access to the strategic highway network, and poor access to the local labour force. Many sites locked up in the urban fabric share the first of these handicaps; some developments in the Green Belt share the second. The policy also notes that any alternative uses 'must not have the potential to constrain the operation of neighbouring businesses, or appropriate future commercial investment'.

- Policy JP8 sets out criteria for the location of bad neighbour industrial uses.

3.10 The sites covered by these different policies are assessed in detail in Volume 2 of this report:

- In the core employment areas (Policy JP5), there are two cases where we consider that an exception should be made and sites should be considered for release to other uses. Even here, as discussed in Chapter 4 below we do not recommend a release in the short to medium term, because we cannot be certain that the sites will not be needed. The first exception relates to parts of the Ashmore Lake CEA that are peripheral, with very poor access, and close to existing housing. Here, housing should be the preferred long-term use, subject to the Core Strategy policy safeguards. The other case concerns the Town Wharf Business Park, which is within the Walsall town centre boundary, where there is scope for service uses as part of a wider regeneration scheme, building on the Walsall Waterfront project that is already underway. Again, this should be subject to policy safeguards to ensure that the existing employment base is maintained.
- In reference to Policy JP6, we have appraised those sites identified as best quality which are not yet developed. We consider that, along with sites like the Tempus 10 sites, the former Moxley Tip and some sites in Darlaston, these sites have the potential to accommodate high quality uses to help fulfil the transformation envisaged in the Core Strategy, albeit that some may require remediation. We therefore consider that this policy is robust, and all but one of these sites should be retained for high-quality uses. The one exception to this is Manor Quays, currently occupied on a temporary basis for a car park while the hospital is redeveloped. Here, we advocate the retention as local quality land, though high quality uses could also be located on this site, perhaps related to the hospital.
- Of the sites covered by Policy JP7, we recommend a number for managed release, where they meet the exceptional circumstances set out in the policy. But our appraisal also reaffirms that the majority of JP7 sites are not affected by these exceptional circumstances and remain fit for purpose. Indeed, these sites provide for a significant part of demand in the Walsall area, for what might be termed the lower end of the industrial scale. Meanwhile other JP7 sites, for example the Maple Leaf, Bentley Mill Way area and Lindon Road (part of the Maybrook area), could have the potential, in view of their good strategic access, to be upgraded in the long term. On a case by case basis, therefore, the ELR could be used to determine how 'exceptional' the site is. In chapter 5 below, we will identify the specific sites covered by these different policies.

The Black Country Core Strategy

- 3.11 As we have already mentioned the Core Strategy, produced jointly by the four Black Country authorities and adopted in February 2011. The Inspectors' report was published in October 2010. It supports both the Strategy's vision and objectives and its employment land policies. On the question of how employment land will be brought forward if and when required, the report suggests that a future review may be required:

'For our part we consider it sufficient for the individual and joint Annual Monitoring Reports (AMR) to identify any emerging material shortfall in employment land availability across the BC and for the Councils and other parties to act on such results accordingly... In the event of a significant failure to deliver the matter would have to be more urgently addressed, potentially via a full review of the Joint Core Strategy as a last resort.'

Vision and Objectives

- 3.12 The Core Strategy is firmly rooted in the Regional Spatial Strategy, of which the last adopted version (known as Phase 1 Revision) was adopted in January 2008. The 2008 RSS in turn was informed by the Black Country Study (2006), which showed how the decline of the area's traditional industries had left behind severe population decline, economic under-performance, social disadvantage and environmental deterioration. Based on that study, the Stage 1 Revision identified renewal and regeneration of the Black Country as a critical regional priority and set out headline objectives for that renewal as follows:
- 'To reverse out-migration...
 - To raise income levels
 - [by] raising... average earnings [and] GDP per head and reducing unemployment to the UK average...
 - To create an inclusive and cohesive society within the Black Country [by]
 - removing barriers to opportunity
 - changing the socio economic mix by increasing the proportion of social grades A and B to match the national profile...
 - To transform the Black Country environment.'
- 3.13 The Core Strategy states that its function is to take forward, for the period up to 2026, the longer-term aspirations for urban renaissance set out in the Black Country Study and the RSS. It underwrites the four headline objectives set earlier and identifies priority locations for growth, comprising the four centres of Brierley Hill, Walsall, West Bromwich and Wolverhampton, and Regeneration Corridors that link those centres. It also sets out 10 more specific 'spatial objectives', of which two are directly relevant to employment land:
- 'A restructured sub-regional economy which provides sufficient high-quality employment land... to attract new high technology and logistics businesses and also recognises the value of local employment land.... [leading to] sustained

economic growth and an increase in the choice of jobs available in the Black Country

- Model sustainable communities on redundant employment land in the Regeneration Corridors, that make the most of opportunities such as public transport and canal networks, are well served by residential services and green infrastructure, have good transport links to retained employment areas and centres, are set in a high quality natural and built environment and are well integrated with surrounding areas.'

- 3.14 The Black Country's stock of employment land is too large in quantity to match demand and insufficient in quality to support the high-value economy that the area aspires to. Therefore this stock is to be split into three parts. The sites with the most potential will be upgraded to accommodate high-value industries and inward investment, that part of the stock which is unwanted will be transferred to housing; and the remaining, 'local-quality' stock will be retained, to meet continuing demand from lower-value occupiers.

Policies EMP1-EMP3

- 3.15 Policies EMP1, EMP2 and EMP3 of the Core Strategy provide the means to deliver this strategy, translating it into land provision targets and development management policies.
- 3.16 Policy EMP1 sets targets regarding the total stock of employment land (defined here and later as the extent of occupied employment areas, including vacant sites under 0.4 ha and the kinds of uses which are not part of the B use class, but normally locate in employment areas). Walsall's stock is to fall over the plan period, from 735 ha in 2009 to 658 ha in 2016 and 611 ha in 2026. Over the whole plan period to 2026, this means a net reduction of 124 ha, or 17%. Supporting text notes that these provision targets are taken from demand forecasts in the Core Strategy's employment evidence base, which comprises a series of studies produced by GVA Grimley between 2005 and 2009. These forecasts in turn are derived from an aspirational ('policy-on') economic scenario which assumes that the Black Country will achieve more jobs in total and higher shares of jobs in high-value and knowledge industries, in line with the urban renaissance vision. The supporting text adds:

'To ensure that the forecast demand for land is met in full, it is essential that this stock be maintained. If the stock becomes too low, because too much employment land is released for housing, or not enough land is developed/redeveloped for employment, there is a danger that economic development may be constrained and the Black Country may not provide enough jobs.'

- 3.17 The Core Strategy also promises to review the delivery of EMP1 and related policies in 2015:

'The land requirements shown above are based on assumptions made in the 2008 GVA Grimley Employment Land Review. These assumptions include job densities, vacancy and proportion of non-class B uses in employment area. It will not be

possible to monitor all these assumptions in AMRs. Therefore, to measure progress towards the targets set out for 2016, in 2015 we will commission a review of the employment land evidence which will see how far key assumptions have come true and suggest remedies to rectify any shortfall in meeting the targets.'

- 3.18 Policy EMP2 seeks to provide high-quality employment areas (or sites), which 'will be characterised by excellent accessibility, high quality environment and clusters of high technology knowledge based sectors'. The policy's rationale, set out in supporting text, is that the area's existing portfolio is not of sufficient quality to deliver the authorities' aspirations for economic growth and diversification; therefore the policy aims for a large increase in the stock of high-quality employment sites, through redevelopment and improvement of those existing employment sites that have the best potential. Walsall's high-quality stock in 2009-26 is to rise from 53 ha in 2009 to 149 ha in 2016 and 317 ha in 2026 . Over the plan period 2009-26, this means a net increase of 264 ha. In terms of development management policies, actual and potential high-quality employment sites are to be safeguarded for employment and related uses and protected from development inconsistent with their status, and the authorities will seek public sector intervention to support their development, improvement and marketing.
- 3.19 Policy EMP3 seeks to provide a portfolio of local quality employment land, defined as 'a critical mass of industrial, warehousing and service activity in fit for purpose accommodation with good access to local markets and employees'. The policy's rationale is that 'in order to achieve the appropriate balance and underpin the local economy it is essential to make provision for those types of industrial, logistics and commercial activity that do not require high-quality strategic locations and are not appropriate for town centres or residential areas'. Policy EMP3 requires large reductions in the local-quality employment areas. Walsall's stock is to fall from 682 ha in 2009 to 519 ha in 2016 and 294 ha in 2026. Over the plan period to 2026, this is a reduction of 388 ha, or 57%. Development management policies are to safeguard the designated areas for industry, warehousing and related uses such as haulage depots, trade counters, scrapyards and waste processing. Supporting text explains the underlying rationale:
- 3.20 'Local Quality Employment Areas are particularly prevalent in the Black Country and play an important role. They provide 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. The technical evidence predicts that the demand for local quality employment land will fall over the Plan period. To accommodate this change and avoid a surplus of such land, the Strategy proposes that some of our existing employment land be upgraded to high quality in line with Policy EMP2. It also proposes phased redevelopment for housing and other uses of the remaining surplus...
- 3.21 Local Employment Areas are often most vulnerable to pressure for redevelopment to other uses such as housing. However, the loss of too much local employment land will compromise the Strategy. It would inhibit economic development, endanger

the viability of businesses and affect the balance of jobs and workers, so workers would have to travel increased distances to work and the viability of firms would be put at risk. In many instances, these areas will also be appropriate to accommodate firms who wish to relocate from housing growth areas, or from the high quality strategic employment areas as a result of redevelopment or rising land values. The Strategy anticipates that land will come forward for development within local employment areas as part of the recycling process.'

- 3.22 Both for high-quality and local-quality employment areas, the Core Strategy's land provision targets are local authority totals. The document and its appendices propose broad locations for each type of area and provide some site-specific detail, taken from the Black Country evidence base. But, in order to allow for local flexibility, this detail is indicative only and does not form part of the formal target. It is left to each authority's local development documents to define precise locations and site boundaries, and also if necessary to refine the development management policies set out in the Core Strategy. We will address these questions later in this report.

Policy EMP4

- 3.23 Policy EMP4 says that the Black Country authorities collectively aim to have 185 hectares of land readily available at any one time, including a minimum provision of 46 ha in Walsall. Appendix 9 of the Core Strategy defines a readily available site as one which meets all the following criteria:
- 'It either has planning permission or an allocation in the development plan for employment... or is subject to any other Council resolution promoting or safeguarding it for employment uses;
 - There are no major problems of physical condition;
 - There are no major infrastructure problems in relation to the scale of development / activity proposed; and
 - It is being actively marketed for employment uses, or there is evidence that there is a willing seller or that the owner wishes to retain all or part of the site for employment uses.'
- 3.24 On a technical note, it should be borne in mind that the EMP4 target is quite different from the targets at Policies EMP1-EMP3, because it uses a different definition, or measure, of employment land provision. The EMP4 target relates to gross gains of employment land; that is, it counts the land on which new employment floorspace is to be built, without deducting gross losses - land on which existing employment floorspace is to be lost. In contrast, the EMP1-EMP3 targets relate to net change in stock – the difference between gross gains and gross losses.
- 3.25 In Chapter 4 below, we provide a list of sites that meet these criteria and compare this supply with the EMP4 target.

Policy DEL2

- 3.26 Provisions to protect employment land where it is still needed are at Policy DEL2, headed Managing the Balance between Employment Land and Housing, which reads in part:

3.27 *'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 as set out in Policies EMP2, EMP3 and EMP4. We will take into account the availability of employment land within the area, the quality of the site and its geographical market...'*

'In areas identified for new housing we will positively plan to facilitate housing growth by:

- Encouraging any existing operation which by virtue of the scale and nature of operations, traffic generation and other amenity considerations may restrict the regeneration of the area to relocate. This relocation will be facilitated with the full support of the local authority concerned, provided that suitable alternative sites and premises are available.
- Resist[ing] new development where this may restrict the regeneration of the area by virtue of the scale and nature of operations, traffic generation and other amenity considerations. Existing businesses who may wish to redevelop or extend their premises will be encouraged to relocate with the full support of the local authority concerned, provided that suitable alternative sites and premises are available.

3.28 Before considering the release of employment land elsewhere we will:

- Ensure satisfactory arrangements for the relocation of existing occupiers to safeguard the existing employment base;
- Ensure that the development does not adversely affect the operation of existing or proposed employment uses;
- Ensure that the site is no longer viable and required either for employment use, including relocation of businesses displaced from sites released to other uses, or for other employment-generating uses.'

Conclusion

3.29 Walsall's land allocations and planning decisions on employment land need to conform with the current policies of the UDP and with the Core Strategy. Our analysis is based on the Core Strategy policy framework, which it translates into area and site-specific detail. It shows how land should be managed to meet the Core Strategy's objectives, but also in accordance with the UDP's aim to promote jobs and prosperity, which is as relevant as ever.

3.30 Like the UDP, the emerging Core Strategy aims to safeguard employment land and to diversify the local economy towards higher value and higher skills by providing better-quality employment sites. Unlike the UDP, the Core Strategy also plans for a large reduction in the area's stock of employment land, to respond to falling market demand and make room for new, better-quality housing in sustainable communities. It sets ambitious targets for this transformation, whereby Walsall in 2009-2026 provides 264 hectares of additional high-quality employment sites and loses 388 hectares of 'local-quality' employment sites; so the Borough's total employment land

stock falls by 124 hectares, or nearly one fifth. At the same time, the Core Strategy firmly safeguards the remaining local-quality employment land; it notes that this land is needed not only for existing occupiers but also to receive relocations from sites being redeveloped.

4 SUPPLY AND DEMAND OF EMPLOYMENT LAND

Planned Supply

The Areas and Sites Audit

- 4.1 Working with Council officers, we have compiled a database of employment sites in Walsall, covering all sites which under existing planning policy are identified for employment – which means industry, warehousing and other (non-B-class) activities permitted in employment areas³. Our schedule covers both existing, built-on employment areas and sites which are currently vacant, awaiting development or redevelopment for employment uses. It includes both a quantitative count of the site areas and a qualitative assessment, which, based on the criteria in the emerging Core Strategy, places each site in one of the following categories:
- i *Existing high-quality sites;*
 - ii *Potential high-quality sites* – which are local quality in 2009 but are capable of upgrading to high-quality if they are suitably redeveloped or improved.
 - iii *Local-quality sites to be released for other uses*
These sites in our opinion are no longer suitable for employment, regardless of market conditions, so if they come forward for transfer to other uses the Council should allow this.
 - iv *Local-quality sites that should be considered for release*
These sites in our opinion are borderline in terms of their attractiveness and suitability for employment. Whether they should be released for other uses should depend on the balance of identified supply against Core Strategy requirements as it evolves over time. This should also be subject to the DEL2 policy in the Core Strategy and in particular as long as this does not destroy jobs in the process.
 - v *Remaining local quality sites, that should be retained*
Which in our view remain suitable for employment and should be safeguarded for that use over the plan period and are not expected to upgrade to high-quality.
- 4.2 In Volume 2 of this report, we assess the Borough's employment areas and sites individually and place them in one of the above categories, based on qualitative criteria. This assessment is purely qualitative. In the next section we will analyse the demand-supply balance quantitatively, calculating total land supply in each category and comparing it with the provision targets set by the Core Strategy.

³ GVA Grimley's 2009 study, which provides the final instalment of the Core Strategy's employment evidence base, already provides a schedule of employment land across the Black Country. Our sites audit reviews and updates that earlier schedule and adds finer-grained geographical detail to it. The differences between the two schedules are described at Appendix 2 below.

Caveats

- 4.3 It is important to note the limitations of our site appraisal. The appraisal relates purely to the planned supply of land: it assesses how much high-quality land and local-quality land the planning system is providing. It makes no attempt to judge how much land in each category the market will demand. These judgments about demand have already been made, through the forecasting that underlies the Core Strategy targets.
- 4.4 The targets tell us that, if the Core Strategy evidence base is correct, by 2026 there will be effective demand for 317 ha of high-quality employment sites and 294 ha of local-quality employment sites; in other words, these are the amounts of land that businesses will wish to occupy and landowners and developers will find it commercially viable to provide. It is not within our remit to reconsider these long-term targets. However, our property market analysis in the last chapter does comment on the short-term prospects of moving towards the targets; our final conclusions in the next chapter will refer back to this analysis.

The Demand-Supply Balance to 2026

- 4.5 In this section, we aim to see if the land supply we have identified is sufficient, in terms of quantity and quality, to meet the targets set out in the Core Strategy. We begin with the EMP1-EMP3 targets and go on to the EMP4 target.
- 4.6 This section has been updated to reflect changes to the sites since our last survey. Some small new sites and areas, omitted from our survey and the Black Country evidence base have been added, and some site boundaries have been altered. The classification of some sites has changed to reflect circumstances on the ground.
- 4.7 Across Walsall the update has identified slightly more land than previous assessments. (26ha or 3.8% of the stock)
- 4.8 As we discuss in more detail below this increase is in local quality sites as opposed to high quality sites. These additional sites contribute slightly to the Borough's over provision of local quality land. But the sites have been added to the stock because they are occupied and so warrant protection for ongoing employment use for the time being. As with our previous report we note that the Core Strategy is a long term document; the Borough is only oversupplied compared to the position the plan expects in 15 years time.
- 4.9 In Table 4.1, we summarise the land supply identified above and compare the resulting supply with the requirements (demand) shown in the Policies EMP1-EMP3.

Table 4.1 Employment Land in Walsall: Demand and Supply

Policy	Type of Area	2009 Supply Ha	2011 Supply Ha	Policy Stance	Core Strategy Require ment Ha
EMP 2 High-quality areas	High Quality Areas	98	95	Safeguard	
	Potential High Quality Areas	255	261	Safeguard and upgrade	
	High-quality Areas 2026	353	356		317
EMP 3 Local quality areas	Local Quality Areas	748	739	(excludes 12.2ha with PP for housing)	
	Of which				
	Potential High Quality	-255	-261	Safeguard and upgrade	
	To be released to other uses	-38	-23	Release	
	To be considered for release	-124	-100	Consider release or mixed renewal	
	Remaining local- quality areas 2026	331	355		294
	Total employment land	846	834		
EMP 1 All areas	Total employment land 2026	684	711		611

4.10 Walsall in 2011 has 95 ha of existing high-quality employment sites and a further 261 potential high-quality employment sites. So by 2026 there may be 356 ha of high-quality employment sites in Walsall. This figure is a maximum, because it assumes that all the sites that are capable of becoming high-quality are in fact upgraded to become high-quality. It exceeds the Core Strategy high-quality target by 39 ha (12%). This surplus does not seem significant. Walsall is meeting the target, with a small amount of extra land to spare.

4.11 *Local-quality* employment sites in 2011 provide 739 hectares⁴. Of this total, 261 ha (already mentioned in the last paragraph) will potentially be transferred to the high-quality category. Another 123 ha have been, will be or may be released for non-employment or mixed uses. This leaves 355 ha of local-quality sites by 2026. This figure is a minimum, because it assumes that all potential high-quality sites become actual high-quality sites, and all the sites which may be allowed to transfer to other uses do in fact come forward for other uses. It is 61 ha over the Core Strategy target of 294 ha. Again, this surplus does not seem significant. This is higher than the 36 ha we reported in 2010. The main reason is that some new sites, omitted from our previous survey and the Black Country evidence base have been identified and so added to the stock of land.

4.12 In total, by 2026 there may be 711 ha of employment land in Walsall. This figure is a minimum, because it assumes that all the sites which may be allowed to transfer to other uses do in fact come forward for such other uses. It exceeds the Core Strategy requirement by 100 ha, or 16%. This is not a significant oversupply given the uncertainty in planning over a 15 year time period. Supply and demand are virtually in balance.

4.13 In summary, we conclude that:

⁴ For simplicity, we include in this total the RELS sites, which at present are undeveloped but are intended to be developed for employment, to provide either local-quality or high-quality floorspace, The GVA Grimley evidence base excludes these sites from the existing stock of employment land, but assumes they will be built up by 2006.

- i) If sites are released to other uses in line with our qualitative assessment, by 2026 there will be slightly more than enough employment land in Walsall to meet the Core Strategy requirement.
 - ii) The Borough has slightly more than enough potential high-quality sites to meet the Core Strategy requirement to 2026.
 - iii) It also has slightly more than enough sites which by 2026 will be still be local quality to meet the Core Strategy target.
- 4.14 So in theory all the 'consider for release' sites could be taken out of employment use, as well as the 'release' sites. But this conclusion assumes that enough of the land we have identified as suitable and currently vacant comes forward for development, and also that none of the land which we have recommended for retention is lost. If this is not the case, then in order to meet the target Walsall will have to retain some of the land which we recommend be considered for release.
- 4.15 But we cannot be certain that these assumptions will come true. To manage the uncertainty and avoid a shortfall of local-quality land against Core Strategy targets, we recommend the Council safeguard most of the 100 ha 'consider for release' sites until the full review of the employment land evidence base which is to take place in 2015. The review would determine future policy for these sites, depending on the latest balance of supply against requirements.

The Five-Year Land Reservoir

- 4.16 We explained earlier that Core Strategy Policy EMP4 requires Walsall to maintain a reservoir of 46 ha of land readily available for development (including redevelopment). Appendix 3 lists current development/redevelopment sites and shows how each site measures up against the EMP4 criteria. The table shows whether sites are readily available or not and gives reasons for this judgment. There are also some borderline cases.
- 4.17 The first thing that is strikingly apparent from this list is the size structure of Walsall's sites. The largest one is only 10 ha. No less than 59 out of the 94 sites in the table are under one hectare. This means that Walsall's industrial offer is heavily weighted towards small, local developments, with far fewer opportunities for large schemes. TKMaxx, Poundland and City Link were able to take advantage of some of the few large sites that were readily available around the turn of the century and in the 2000s.
- 4.18 Secondly, Walsall has a problem in reaching the minimum 46 ha necessary to maintain its reservoir of readily available industrial land. At present the Council can only identify 19.78 ha of land which meets the Core Strategy criteria (12.73 ha if we exclude borderline cases). Most of the Borough's largest sites do not meet the readily available criteria.
- 4.19 Of course, this follows a severe recession, which has reduced the amounts of land which owners are actively marketing or plan to develop. With a depressed market there has been reduced motivation to actively promote sites. Also a reduced

ability for owners to invest and remove even minor constraints to make them available.

- 4.20 This leads to the third main area of concern – the sheer amount of land that is contaminated and needs remediation. On the latest information, at least 59 of the 125 ha of vacant employment land listed in appendix 3 are currently affected by adverse ground conditions to such an extent that significant remediation is required. This is quite aside from other constraints, such as poor access and proximity to housing, that some of these sites may have.
- 4.21 Indeed, if we consider Walsall's top ten sites in terms of size, seven have poor or severe ground conditions. Two more have suspected poor ground conditions. This leaves only one that is in good condition – Reedswood Way. But the owner has not previously been marketing it for industry and has been seeking housing (we advise that the site should be retained). If the Reedswood way site is lost to housing, this leaves the largest clearly readily available site as Tempus 10 South at only 2.1 ha (which has a planning permission for industry on part of the site). -
- 4.22 There is a real danger that Walsall will run out of reasonably-sized readily available sites for industry, so that and even the low take-up rates observed over the past few years cannot be sustained in the future, and the recent upturn in take up is not sustained. Since the Borough's economy has not diversified into high-end services (as opposed to those dependent on local consumer expenditure) it continues to rely to a great extent on industry and related land uses. These sectors could increasingly miss out on the investment to sustain it, and Walsall could experience an outflow as businesses leave the Borough to find less constrained premises. To avoid this and to meet the EMP4 target will need action to remediate contaminated land, and especially the largest sites.

5 CONCLUSIONS

Area and Site-Specific Recommendations

- 5.1 As noted in the Introduction above, the main question for this study is what Walsall Council should do to deliver the employment land policies set out in the emerging Black Country Core Strategy. To answer this question, we have first made a qualitative assessment of all the Borough's employment sites (shown in Volume 2) and then totalled the results across the Borough, to see how Walsall's total land supply measures up against the Core Strategy targets for employment land provision to 2026.
- 5.2 Our qualitative assessment has split Walsall's planned land supply has categorised employment sites as follows:
- Existing and potential *high-quality sites*, which should be *safeguarded for employment uses*
 - *Local-quality sites* which do not have the potential to become high-quality, and in turn comprise:
 - Sites which are no longer suitable for employment and *should be released* for other uses;
 - Sites which should be *considered for release* to other uses, because their suitability for employment is borderline;
 - *Remaining local-quality sites*, which are still fit for purpose and should be *retained for employment*.
- 5.3 We have compared our recommendations with the land provision targets in the Black Country Core Strategy. The comparison shows that the supply we have identified is slightly above these targets both for existing and potential high quality employment sites (and for local-quality sites to be retained as such over the Plan period. But this finding assumes that all the required sites come forward for development; if this assumption does not hold true, Walsall may fail to meet the Core Strategy targets. To guard against this risk, and also because the SHLAA shows that Walsall will have no difficulty in providing its five-year housing land supply, we recommend that most of the sites we classify as 'consider for release' be safeguarded for employment until the review of the evidence base which is due in 2015.
- 5.4 We have also cross-checked the above recommendations against Policies JP5-JP7 of the Unitary Development Plan (UDP) (which will remain in force until they are replaced by an LDF Site Allocations document) and found that:
- All the sites identified in the UDP as core employment sites (Policy JP5) are recommended in our appraisal to be retained, with three exceptions – part of Ashmore Lake, Town Wharf and Northcote Street.

- All but one the sites identified in the UDP as best-quality sites (Policy JP6) are classified in our assessment as within existing or potential high-quality employment areas, which should be safeguarded for employment. The exception is Manor Quays, which we recommend be retained as local quality land
- Of the 'other employment areas' covered by Policy JP7, we recommend some for retention, some for release, and some to be considered for release.

5.5 There are two main practical implications following from this. First, how to deal, on a case by case basis, with applications for housing on employment land. As we have pointed out above, there is no case to transfer any JP6 best-quality sites. Neither should any JP5 core sites be transferred, except possibly some parts of Ashmore Lake and Town Wharf, and only then under certain circumstances as set out in DEL2 of the Core Strategy. In relation to JP7 sites, we have aimed to provide a consistent and robust assessment of which sites are affected by 'exceptional circumstances' and might be released for other uses. Even so, in releasing these sites the Council should err on the side of caution, bearing in mind that the majority are in the borderline 'consider for release' category, which means that they may still be suitable for employment and should probably be retained at least for the next five years.

5.6 Secondly, there is an issue of what to do about cases where industry wishes to redevelop or invest in sites that in the long term could be transferred to housing. As noted earlier, if our recommendations are followed the amount of employment land released for housing over the next five years will be limited. Core Strategy Policy DEL2 states that in certain circumstances new employment development should be resisted in areas identified for housing growth. However any such proposal needs considering on its merits; where firms choose to invest in the area and the investment will not prejudice the regeneration of the area there is no reason why companies should be forced to look elsewhere.

The Five-Year Land Reservoir

5.7 We have found that Walsall's land supply falls far short of the requirement to maintain a five-year reservoir of 46 ha of readily developable land, in line with Policy EMP4 of the Core Strategy. The shortfall is some 26ha.

5.8 Land contamination is a major reason why land is not readily developable, so to move towards the target will require remediation of contaminated sites. In the short term, in order to progress towards the target the Council should also seek every opportunity to safeguard for employment suitable sites which become readily available in the short term – whether previously in use for employment or for other uses, such as schools or utilities.

The Wider Picture

5.9 Beyond this area and site-specific advice, a general conclusion from our analysis is that the Core Strategy targets are challenging, and land-use planning on its own is not capable of delivering them. Although we have not considered in detail the

evidence supporting the targets, we have noted that their main basis is an aspirational employment scenario, which assumes that the ambitious economic objectives set in the RSS and the Core Strategy are achieved in full. Moreover, our analysis of the property market in Chapter 3 suggests that in the short term at least Walsall has little prospect of attracting new, higher-value occupiers or financially viable industrial/warehouse development. However there is some evidence that local firms have renewed confidence and are investing in sites and property.

- 5.10 Admittedly the property market has a limited time horizon, so this situation may change beyond recognition in the plan period to 2026. Nevertheless, for the foreseeable future there will not be progress towards the Core Strategy targets unless there is large public sector investment in infrastructure and land reclamation to help bring forward key sites for development. This public funding is not yet guaranteed, so there is a risk that the Core Strategy targets will not be delivered, even if planning policy is the best it can be.
- 5.11 Therefore we suggest that the Core Strategy's employment land policies as a whole should be reviewed within five years, in the light of progress to date and the amount of public intervention that is coming forward. As proposed in the Inspectors' report on the Core Strategy this fundamental review should only be triggered if monitoring data show disappointing progress towards the EMP2 target, relating to high-quality development/redevelopment, together with economic data about employment growth, inward investment and diversification towards higher-value industries. If a review is triggered, it should consider both the quantitative targets themselves and the choice of sites for industrial development/redevelopment.
- 5.12 The Core Strategy aspirations are partly built on developing some very challenging sites; including the former IMI Copper Works but also many other smaller but still complicated sites. While the strategy maybe based on commitments for funding and remediation in the new climate we may no longer be able to rely on these promises – the closure of the Walsall Regeneration Company only illustrates the new climate. A hard nosed re-evaluation may conclude the only economically viable future for some land is a green end use. If this strategy becomes a long term one then sites such as this can no longer be considered part of the supply; if the Core Strategy objectives are to be met Walsall will need either new sites or to reduce its aspirations (reducing the Core Strategy targets).
- 5.13 Another serious risk is that too much local-quality employment land, or the wrong land, may be released for other uses. Based on the analysis above, there are good reasons to fear this risk. Thus, our calculations have shown that the planned supply of local-quality sites is tight against the Core Strategy target and our market analysis has shown that many local companies depend on this low-cost supply to survive, as they do not need and cannot afford new high-quality floorspace. Moreover, we know from the market analysis that on sites identified for industrial development/redevelopment the necessary investment will take time to materialise, until the market improves and/or public funding comes forward; in the meantime, owners seeking permission for other uses may try to persuade Planning Inspectors

that it is unreasonable to leave land vacant for years on end, especially if market testing shows that in the short term they are not viable for industrial development.

- 5.14 Even if enough local-quality land is successfully safeguarded to meet the remaining demand, careful management will be required to ensure that the qualitative mix of sites is right and the timing of redevelopment is right. Planning should work to maintain the identity and critical mass of remaining employment area, avoiding gradual erosion through 'housing creep'. This might require design measures such as buffer zones and lower-density housing than one would normally expect, to allow for buffer zones between housing and employment.
- 5.15 In short, it will be important that the release of employment land be carefully and sensitively managed, in line with Policy DEL2 of the Core Strategy. If it is not, the outcome will be loss of local businesses and local jobs. The Borough can ill afford this, especially as in the present economic climate it will take time to attract the new, better jobs that policy is seeking.

APPENDIX 1

Definition of Industrial/Warehousing Land Uses

Industrial Sectors	SIC (2007)	
Manufacturing	15 - 33, 95	<ul style="list-style-type: none"> ▪ All manufacturing ▪ Repair of computers and personal and household goods
Some Construction	43.2, 43.3, 43.9,	<ul style="list-style-type: none"> ▪ Electrical, plumbing and other construction installation activities ▪ Building completion and
Motor Vehicle Activities	45.2, 45.4	<ul style="list-style-type: none"> ▪ Maintenance and repair of motor vehicles ▪ Sale, maintenance and repair of motor cycles and related parts
Sewage and Refuse Disposal	37, 38	<ul style="list-style-type: none"> ▪ Sewage ▪ Waste collection, treatment and disposal activities
Employment Activities (part) ⁵	78	▪
Warehousing Sectors	SIC (2007)	Activities
Wholesale	46	▪
Freight Transport by Road	49.41	
Removal services	49.42	
Storage and Warehousing	52.10	
Other Supporting Land Transport Activities	52.21	
Cargo Handling	52.24	
Post and Courier Activities	53	
Packaging Activities	82.92	▪
Employment Activities (part)	78	▪
Office Sectors (including R&D)	SIC (2007)	Activities
Publishing	58.1	▪
Motion Picture, Video and TV programme activities	59.11, 59.12, 59.13, 59.2	<ul style="list-style-type: none"> ▪ Motion picture production activities ▪ Motion picture programme post production activities ▪ Motion picture distribution activities ▪ Sound recording and music publishing activities
Programming and broadcasting activities	60	<ul style="list-style-type: none"> ▪ Radio Broadcasting ▪ TV programming and broadcasting activities

⁵ Employment agency covers all workers employed through agencies. These workers operate in a wide range of activities throughout the economy. Therefore we allocate them to both b and non-B sectors based on their shares in the total economy.

Computer programming, consultancy and related activities	62	<ul style="list-style-type: none"> ▪ Computer programming activities ▪ Computer consultancy ▪ Computer facilities
Information Services	63	<ul style="list-style-type: none"> ▪ Data processing ▪ Web portals ▪ Other information service activities
Financial & Insurance Activities	64, 65, 66	<ul style="list-style-type: none"> ▪ Financial services, except insurance and pension funding ▪ Insurance, reinsurance and pension funding except compulsory social security ▪ Activities auxiliary to financial services and insurance activities
Real Estate Activities	68	<ul style="list-style-type: none"> ▪
Legal and Accounting Activities	69	<ul style="list-style-type: none"> ▪
Activities of head offices, management consultancy activities	70	<ul style="list-style-type: none"> ▪
Architectural and engineering activities, technical testing and analysis	71	<ul style="list-style-type: none"> ▪
Scientific R & D	72	<ul style="list-style-type: none"> ▪
Advertising and market research	73	<ul style="list-style-type: none"> ▪
Other professional, scientific and technical activities	74	<ul style="list-style-type: none"> ▪ Specialised design activities ▪ Photographic activities ▪ Translation and interpretation activities ▪ Other professional, scientific and technical activities nec
Renting and leasing activities	77.4	<ul style="list-style-type: none"> ▪ Leasing of intellectual property and similar products
Employment activities (part)	78	<ul style="list-style-type: none"> ▪ Activities of employment placement agencies ▪ Temporary employment agencies ▪ Other human resource provision
Security and investigation activities	80	<ul style="list-style-type: none"> ▪
Office admin, office support and other business support activities	82.1, 82.2, 82.3, 82.91, 82.99	<ul style="list-style-type: none"> ▪ Office admin and support activities ▪ Activities of call centres ▪ Organisations of conventions and trade shows ▪ Activities of collection agencies ▪ Other business support service activities

Administration of the State	84.1, 84.3	<ul style="list-style-type: none">▪ Administration of the State and the economic and social policy of the community▪ Compulsory social security activities
Activities of membership organisations	94	<ul style="list-style-type: none">▪

APPENDIX 2

Areas and Sites Audit Comparison with Core Strategy Evidence Base

As noted in the main report, the Core Strategy evidence base includes a schedule of employment land in Walsall, which forms part of GVA Grimley's 2009 report. This schedule, like our site audit, relates to 2009. There are three main differences in coverage between the 2009 report and our site audit.

Firstly, the 2009 report excludes vacant land identified for employment in parcels of over 0.4 ha, called 'RELS sites' and formerly monitored by Mott MacDonald on behalf of the Regional Assembly. With the exception of a few large development sites (including Reedswood Way and Tempus 10), most RELS sites are part of larger established employment areas. Some used to be built up and have been cleared pending redevelopment. Others are the last remaining parcels of development land in now established estates. Under the current development plan, which is the Walsall UDP, the RELS sites are safeguarded for employment. Therefore, as explained in the body of the report, we consider them part of the existing land supply at 2009 and include them in our sites audit.

Secondly, our consultant team and the Council's planning officers have found a number of sites which were omitted from GVA Grimley's surveys, but are currently in employment use and therefore part of the stock.

Thirdly, we have excluded from our audit a small amount of land which was included in the GVA Grimley schedule, but have now been redeveloped for housing.

Overall, our audit finds 879 hectares of employment land in Walsall in 2009, including the RELS sites. GVA Grimley's 2009 report found 735 hectares, excluding the RELS sites.- update. As noted elsewhere this 2011 update identified even more land omitted from the Black Country evidence base.

APPENDIX 3

Walsall Vacant Land Supply at December 2011

Walsall's Vacant Employment Land Reservoir as at December 2011

rank	site	Group	vacant since	size, ha	physical/infrastructure issue	marketing situation	
1	FMR IMI, Reservoir Rd, Pleck	3 Walsall	2002	10.1	Severe ground contamination	not marketed; development medium/long term	not RA
2	FMR IMI/Cerro, Goscote Lane	4 Bloxwich	1970s/2002/2010	8.9	Poor ground conditions ; access via housing areas; distant from mway	not marketed; no indication of plans to develop	not RA, more suitable for housing
3	FMR Moxley Tip	3 Darlaston	2010	7.9	Poor ground conditions	not marketed; no indication of plans to develop	not RA
4	FMR Caparo	3,4 Walsall	2011	6.2	Constrained by housing, poor access, poor ground conditions	Harris Lamb	not RA, more suitable for housing
5	FMR Wesson Ductile, Bull Lane, Moxley	3 Darlaston	2011	4.7	Likely poor ground conditions, but good access	not marketed, no indication of plans to develop for industry	not RA
6	Reedswood Way	3 Walsall	1998	4.34	no problems	not marketed for industry; owner promoting housing	not RA
7	Adj Trident Alloys, Willenhall Lane, Bloxwich.	1 Bloxwich	2009	3.61	minor highways issue; possible contamination	Savills	borderline case
8	Jobern's Tip Yards 1 & 2	3 Aldridge	1979	3.38	poor ground conditions	being marketed for storage	not RA
9	Fryers Rd Bloxwich	3 Bloxwich	1990s	3.27	poor ground conditions	not marketed; development likely to be medium/long term	not RA
10	R/O Globe PH	3 Darlaston	longstanding	3.27	severe ground contamination	not marketed; no indication of plans to develop	not RA
11	Adj Gasholder Site, Darlaston Rd	3 Darlaston	1970s	2.81	very constrained access to site	Bulleys	not RA
12	Bescot Triangle	3 Walsall	1980s	2.75	very constrained access	not marketed, no indication of plans to develop	not RA
13	FMR Metal Casements	4 Walsall	?	2.57	very constrained access to site, poor ground conditions	not marketed; likely to be developed for housing	not RA, more suitable for housing
14	N of Newfield Close	2 Walsall	longstanding	2.31	no major problems	not marketed	not RA
15	FMR Rail Sidings, Middlemore Lane	3 Aldridge	1986	2.28	poor ground conditions	pa for storage	not RA
16	Bentley Mill Way East	3 Darlaston	longstanding	2.2	poor ground conditions; poor access	not marketed	not RA
17	Tempus 10 South	1 Walsall	1992	2.1	no problems, good access	pp for warehousing; Bulleys & KGD	readily available
18	Monmer Lane/St Anne's Rd	4 Willenhall	2002	2.07	poor ground conditions; poor access	Harris Lamb, open storage only	not RA, more suitable for housing
19	BCR Jn 1 Site B	3 Darlaston	longstanding	2.03	some housing immediately abutting the site	not marketed; owner unwilling to sell	not RA
20	Tempus 10 North	1 Walsall	1992	1.95	no apparent problems	Bulleys	readily available
21	N of Maybrook Industrial Est	1 Brownhills	longstanding	1.93	no major problems; recent pp for B1/B2/B8 on part of site	Harris Lamb	readily available
22	Electrium, Ashmore Lake Way	3 Willenhall	longstanding/2011	1.9	poor ground conditions	not currently marketed but interest in developing site	not RA
23	FMR Jack Allen site, Middlemore Lane, Aldridge	1 Aldridge	2009	1.8	no apparent problems	DTZ	readily available
24	Adj Jobern's Tip, Coppice Lane, Aldridge	3 Aldridge	1970s	1.79	poor ground conditions	not marketed; no indication of plans to develop	not RA
25	Central Point, Willenhall Rd	1 Darlaston	2000	1.72	awaiting DOC re remediation work; no other problems	Bulleys/Atisreal	borderline case
26	FMR Wagon	2 Brownhills	2009	1.7	no problems	current planning application	readily available
27	Box Pool Site, Darlaston Rd	1 Darlaston	1980s	1.67	no major problems (now remediated)	pp /Darlaston builders merchants	readily available
28	Aldridge Park	1 or 2 Aldridge	1970s	1.51	no problems	owner wishes to develop for industry	borderline case
29	Bullows Rd, Brownhills	2 Brownhills	greenfield	1.47	no major problems	not being marketed; no indication of plans to develop	not RA
30	FMR Wesson Car Park, Bull Lane, Moxley	2 Darlaston	2008	1.3	potential poor ground conditions	not marketed, no indication of plans to develop	not RA
31	FMR PSL International, Longacres, Willenhall	2 Willenhall	2008	1.19	no apparent problems	not being marketed; no indication of plans to develop	not RA
32	R/O Geo Carter Pressings	3 or 4 Willenhall	longstanding	1.03	poor access	Fraser Wood	not RA,
33	Stafford RD, Darlaston	4 Darlaston	2009/2010	1.08	constrained by housing, poor access, more suitable for housing	not marketed, no indication of plans to develop	not RA, more suitable for housing
34	S of Watery Lane, Willenhall	2 Willenhall	longstanding	1.01	no apparent problems	not marketed, no indication of plans to develop	not RA
35	Eldon Wall, Woods Bank	4 Darlaston	1988	0.98	constrained by housing, poor access	not marketed; no indication of plans to develop	not RA, more suitable for housing
36	FMR Calor Gas Site, Green Lane, Walsall	2 Walsall	2006	0.98	no apparent problems	not marketed; no indication of plans to develop	not RA
37	FMR Cardboard Box Factory, Spring Lane, Willenhall	4 Willenhall	?	0.92	constrained by poor access and housing; better suited to housing	Burley Browne; interest in housing	not RA
38	FMR Lex Rover site, Town Wharf, Walsall	4 Walsall	2005	0.89	constrained by housing, poor ground conditions, more suitable for TC use	potential town centre uses as part of Town Wharf development	not RA
39	Axcess 10, Bentley Rd Sth, Darlaston	2 Darlaston	1988	0.84	no apparent problems	not marketed, no indication of plans to develop	not RA
40	Adj Shaylor's, Wharf Approach	2 Aldridge	1970s?	0.75	no apparent problems	not marketed; no indication of plans to develop	not RA
41	Walsall Enterprise Park Northeast	2 Walsall	1980s	0.75	no problems	not marketed	not RA
42	FMR Scrapyard, Alma St/Green Lane	3 Walsall	2004	0.7	poor ground conditions	not marketed; planning permission has lapsed	not RA
43	Linley Lodge, Westgate, Aldridge	1 Aldridge	longstanding	0.7	no problems	pa for B8	readily available
44	R/O Intercoat Paints, Long St, Walsall	2 Walsall	2007	0.7	no apparent problems	not marketed; no indication of plans to develop	not RA
45	Midland Rd	4 Walsall	2011	0.67	constrained by housing/ alternative uses;	marketed for housing	not RA; more suitable for housing/town c
46	Longleat Rd E, Aldridge	2 Aldridge	longstanding	0.63	no apparent problems	not marketed; no indication of plans to develop	not RA
47	N of Westacre, Willenhall	3 Willenhall	longstanding	0.63	unstable ground.	Harris Lamb, marketed for storage only	not RA
48	N of Watery Lane, Willenhall	3 Willenhall	longstanding	0.61	no access; poor ground conditions	not marketed; no indication of plans to develop	not RA
49	R/O Spring Lane, Ashmore Lake, Willenhall	3 Willenhall	longstanding	0.56	constrained access,	previous marketing	not RA, more suitable for housing
50	Cable Drive,Walsall	3 Walsall	1990s	0.54	no access, surrounded by car park	not marketed, no indication of plans to develop	not RA
51	Walsall Enterprise Park NW	2 Walsall	1980s	0.54	no apparent problems	not marketed	not RA
52	Mill St/North St, Walsall	4 Walsall	?	0.51	constrained by housing, poor access,	not marketed, no intention to develop	not RA
53	Adj CSL Longacres, Willenhall	3 Willenhall	1970s?	0.5	small and constrained by housing	not marketed; no indication of plans to develop	not RA
54	FMR ROH Wheels, St Anne's Rd, Willenhall	4 Willenhall	1990s?	0.49	poor access	not marketed; no indication of plans to develop	not RA, more suitable for housing
55	Land Adj JD Snooker Club	4 Willenhall	2004	0.49	poor access, constrained by other uses	not marketed, no indication of plans to develop	not RA, more suitable for housing
56	Land Opp Mary Elliot School, Leamore Lane, Bloxwich	2 Bloxwich	2009	0.48	small but no apparent problems	in use as car park	not RA
57	Adj FMR BOC, Beecham Close, Northgate, Aldridge	3 Aldridge	1979	0.46	small but no apparent problems	not marketed, no indication of plans to develop	not RA
58	FMR MEB Substation, Lichfield Rd, Bloxwich	4 Bloxwich	2005	0.46	small, more suitable for housing	not marketed, no indication of plans to develop	not RA
59	R/O Wellington PI Willenhall	3 Willenhall	longstanding	0.46	constrained; poor access	not marketed; no indication of plans to develop	not RA
60	Canalside Close, Bloxwich	3 Bloxwich	longstanding	0.45	infrastructure & ground problems	sporadic marketing for storage in the past	not RA
61	Adj Middleton Paper, Bescot Cres, Walsall	2 Walsall	1990s	0.44	no apparent problems	not marketed; no indication of plans to develop	not RA
62	FMR Wye Foundry, Stringes Lane, Willenhall	2 Willenhall	2002	0.44	no apparent problems	not marketed; no indication of plans to develop	not RA
63	Carl St	3,4 Walsall	2011	0.47	close to housing	not marketed, housing pp lapsed	not RA
64	Walsall Enterprise Park N, Pleck, Walsall	2 Walsall	1980s	0.43	no apparent problems	not marketed	not RA
65	Heath Rd/Kendricks Rd, Darlaston	3 Darlaston	longstanding	0.41	constrained, metro issue	not currently marketed, no intention to develop	not RA
66	Longleat Rd W, Aldridge	2 or 3 Aldridge	longstanding	0.4	unclear; adjacent to sites with ground problems	not marketed; no indication of plans to develop	not RA
67	Adj Cashmore's, Upper Brook St, Walsall	3 Walsall	2009	0.37	unclear; possible poor ground conditions	not marketed, no indication of plans to develop	not RA
68	St Anne's Industrial Estate, St Annes Rd, Willenhall	4 Willenhall	longstanding	0.36	very poor access	not marketed; no indication of plans to develop	not RA, more suitable for housing
69	FMR Railway Tavern James Bridge Darlaston	3 Darlaston	2011	0.34	likely to have poor ground conditions	not marketed	not RA
70	Adj Carrington's, Willenhall Lane	3 Bloxwich	1970s?	0.33	no apparent problems	not marketed; no indication of plans to develop	not RA
71	Hollands, Adj canal, Bentley Rd Sth, Darlaston	3 Darlaston	2009	0.33	possible poor ground conditions	not marketed, no indication of plans to develop	not RA
72	Rose Hill Industrial estate, Longacres, Willenhall	1 Willenhall	2006	0.33	no apparent problems	Bulleys (as part of premises)	readily available
73	Adj Afro-Caribbean Centre, Hollyhedge Lane, Walsall	4 Walsall	1999	0.32	very constrained and adj to other non-industrial uses	Mason Young	not RA, more suitable for housing
74	Green Lane Opp Cable Drive, Walsall	3 Walsall	longstanding	0.31	small & constrained	not marketed, no indication of plans to develop	not RA
75	FMR Morland Depot, Willenhall Lane, Bloxwich	3 Bloxwich	1980s?	0.3	constrained access, close to housing	Council owned, no intention to develop	not RA
76	Corner of Church Street/Moxley Rd	3 Darlaston	2011	0.27	small	not marketed; no indication of plans to develop	not RA

rank	site	Group	vacant since	size, ha	physical/infrastructure issue	marketing situation	
77	Holland's, Bentley Rd Sth/Rail Line, Darlaston	3 Darlaston	2009	0.26	unclear; possible poor ground conditions	not marketed, no indication of plans to develop	not RA
78	Maybrook Rd/Clayhanger Rd, Brownhills	3 or 4 Brownhills	longstanding	0.26	no apparent problems	not marketed, owner promoting housing	not RA
79	Revival Street Bloxwich	4 Bloxwich	2011	0.26	surrounded by housing - more suitable for industry	not marketed	not RA
80	Raybould's Bridge/Green Lane, Walsall	3 Walsall	longstanding	0.24	small & constrained, no access	not marketed, no indication of plans to develop	not RA
81	Ward St, Ashmore Lake, Willenhall	3 Willenhall	longstanding	0.24	small, constrained, though in established ind area	not marketed, no indication of plans to develop	not RA
82	Forge Rd, Ashmore Lake, Willenhall	3 Willenhall	longstanding	0.23	small, residential close by	not marketed, no indication of plans to develop	not RA
83	Revival St	4 Bloxwich	2011	0.22	small, residential on all sides	not marketed	not RA , more suitable for housing
84	Adj Ikea, Park Lane, Darlaston	2 or 3 Darlaston	1980s	0.21	small & constrained	owner to market	borderline case
85	FMR Crescent Works, Willenhall Rd, Darlaston	1 Darlaston	2011	0.2	small but good access	recent pp, owner to develop	readily available
86	Charles Richards, Heath Rd, Walsall	3 Walsall	longstanding	0.2	derelict part of factory	not marketed; no indication of plans to develop	not RA
87	Green Lane/Old Birchills, Walsall	3 Walsall	longstanding	0.2	small, constrained, no access	not marketed, no indication of plans to develop	not RA
88	Woods Bank Units 8/9, Woden Rd W, Darlaston	1 Darlaston	2006	0.2	small, in established ind area	unclear but pa indicates that owner intends to develop	readily available
89	R/O Beecham Close, Aldridge	3 Aldridge	2009	0.2	small, expansion land	not marketed, no indication of plans to develop	not RA
90	R/O Spring Lane Cul de Sac, Ashmore Lake, Willenhall	3 Willenhall	longstanding	0.17	small, perh better suited to housing in the long run	not marketed, no indication of plans to develop	not RA
91	Adj Hargreaves, Willenhall Lane, Bloxwich	3 Bloxwich	1970s?	0.16	small, constrained	not marketed, no indication of plans to develop	not RA
92	Holme Dodsworth, Commercial Rd, Bloxwich	1 Bloxwich	2011	0.15	small but ready for redevelopment		readily available
93	Croxstalls Rd, Bloxwich	3 Bloxwich	longstanding	0.12	small, constrained, no access	not marketed, no indication of plans to develop	not RA
94	FMR Hammer Forge, Rollingmill St W, Walsall	3 Walsall	2010	0.08	very small	not marketed, no indication of plans to develop	not RA
				125.98			