
Sandwell Local Plan 2024-2041 - Examination

Inspector

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MATTERS, ISSUES AND QUESTIONS (MIQs) for Hearing Week 1

MATTER 2: Vision, Objectives, Sandwell's Housing and Employment Needs, and the Plan's Overall Scale of Growth
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Issue 2a – Whether the vision, priorities and strategic objectives have been positively prepared and are justified, effective and consistent with national policy for the achievement of sustainable development.

Q2.1 Are the plan's vision, priorities, and strategic objectives justified, consistent with national policy, and relevant for Sandwell?

The SLP Vision (paragraph 1.4 of the SLP) covers the plan period to 2041 and is based on the profile and demographics of the borough, which also feed into the accompanying objectives and principles. The themes of the Vision and objectives are also reflective of the Council Plan and other strategic initiatives. Given the extant and emerging issues highlighted elsewhere in the SLP, the Vision and objectives are justified, as issues such as poor health, climate change, unemployment, lack of access to open spaces, educational opportunities and accessibility will have disproportionate adverse impacts on Sandwell's local communities.

The Vision reflects the Council's Corporate Plan and the Sandwell Vision 2030, as set out in paragraph 1.2 of the SLP. The Council's wider corporate approach has been used to create a framework for expressing the Council's aims as they relate to land use planning, which the policies of the SLP will help shape and deliver.

The Vision has also been subject to extensive public consultation, with Sandwell residents, stakeholders and other interested parties having the opportunity to consider and comment upon it, including on what it should cover, at various stages of the plan's preparation.

The SLP Vision reflects the specific circumstances of Sandwell, including:

- the need to address poor health outcomes, deprivation and social fragmentation,
- the legacies of historic industrial decline and pollution,
- the borough's continuing success in manufacturing, technology and innovation,
- population growth and the specific housing needs of the local community,
- the need for educational improvements,
- the borough's significant historic and cultural context, including Sandwell's role in the Industrial Revolution,
- The threats and opportunities posed by climate change for the densely developed borough,
- Sandwell's unique patchwork of open and green spaces within a highly urbanised and developed area.

The Vision depicts a borough where the positive legacies of Sandwell's past (manufacturing and employment skills and resilience, a significant supply of extant employment land, a network of open spaces including a country park, good accessibility) have been used to deliver increased economic, social and environmental benefits to local communities, such as ensuring that its open spaces are retained and used to improve the health and wellbeing of local people.

The SLP's priorities and objectives (set out in Table 3, paragraph 1.6 of the SLP) are clearly linked to the policies of the plan, as set out in the table. These demonstrate not only the trajectory set by the Vision that feeds into the strategic objectives, but also the interrelationships between those strategic elements and plan delivery via the identified policies. These objectives and principles were also the subject of public consultation, starting with the Issues and Options stage in 2023, when people were asked for their thoughts on the draft objectives. Comments received were considered and used to shape the objectives in the subsequent draft SLP.

Paragraph 1.7 of the SLP identifies that to ensure the success of the SLP Vision and objectives, monitoring targets have been created for relevant policies. These will ensure that the Council can develop a clear sense of what is working to deliver the scale of improvements needed to deliver on what

is an ambitious but realistic Vision, and what needs to be adjusted or reworked as the SLP moves through the plan period.

NPPF, paragraph 15 states that,

“Succinct and up-to-date plans should provide a positive vision for the future of each area”.

The Council believes that its Vision is relevant to Sandwell, offers a pragmatic and realistic view of what the borough could be with the adoption of the policies set out in the SLP over time, and is a positive reflection of the aims, objectives and proposed outcomes of the SLP.

National planning policy guidance on plan-making (ID: 61) also states (paragraph 001) that,

“Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.”

Sandwell's local plan Vision, objectives and principles reflect these aspects in relation to the borough, as well as meeting the requirements set out in section 19 of the Planning and Compulsory Purchase Act 2004 (as amended), with regard to identifying strategic priorities for the development and use of land in Sandwell, producing policies to address those issues, and addressing climate change.

Q2.2 In terms of this issue, are any specific main modifications necessary for soundness?

While the Council is satisfied that it has submitted a sound plan, should the Inspector be minded to recommend any further modifications without which she would consider the SLP to be unsound, the Council would be pleased to receive them.

Issue 2b – Whether the assessment of housing needs and the plan's overall scale of housing growth for the settled community are justified, positively prepared, effective and consistent with national policy.

Note: This issue concerns the overall housing needs in the borough, and the housing requirement included in the plan. The soundness of other aspects of Policy SDS1 and the plan's other policies and allocations relating to housing for the settled community will be considered under other Matters.

- Q2.3** Is the plan's total housing requirement of at least 10,434 net new homes (which the plan states would result in unmet need for 15,916 homes in the borough over the plan period 2024-2041), justified? Including:
- a. Is the assessment of local housing needs for Sandwell robust, sufficiently up to date, and has the standard method for assessing the minimum local housing need been correctly applied?
 - b. Are there any exceptional circumstances that would justify calculating Sandwell's housing need on a basis other than the standard method?
 - c. Have the levels of need in Sandwell for affordable housing and other specialist housing needs of particular groups, including for older people and people wanting to build their own homes, been appropriately assessed and considered?
 - d. Are the assessments of land capacity for residential development in Sandwell, and the site selection methodology and process used to inform the selection of sites for allocation in the plan, sufficiently robust? Including:
 - a. How have constraints to development in the borough influenced site selection, capacity, and the Plan's overall spatial strategy?
 - e. Have potential opportunities for housing development in the borough's area of designated Green Belt been appropriately considered? Including:
 - i. Is the evidence base relating to the Green Belt sufficiently up-to-date and robust? Is it consistent with relevant national policy?

- ii. Is the plan's overarching requirement and strategy for housing provision consistent with the evidence base for the Green Belt?
- iii. Do exceptional circumstances exist that would justify changes to Green Belt boundaries?
- f. Have all potential sources of housing land supply been explored and exhausted such that a housing requirement below the objectively assessed need could be justified?
- g. Overall, is the plan's housing requirement justified and positively prepared?

Yes. The Council has used the relevant standard method as recommended at paragraph 61 of the December 2023 NPPF. The methodology is set out in previous version of the National Planning Practice Guidance (NPPG) that was in force at the time of the 2024 Publication Plan [[PPG Paragraph: 005, Reference ID: 2a-005-20190220, Revision date: 20 02 2019](#)]

The previous version of the NPPG explains that the starting point for the standard method is the Office for National Statistics 2014-based household projections. For Sandwell, the average annual household growth for the period 2024-34 is 13,329, equating to an annual figure of 1,333. This figure is subject to an affordability adjustment using the Office for National Statistics 2023 workplace-based affordability ratio, which results in an annual housing need figure of 1,550.

Therefore, the local housing need figure for Sandwell is 1,550 per annum. This equates to a total housing need of 26,350 homes over the Local Plan Period from 2024 - 2041.

The more recent December 2024 version of the NPPF (which the SLP is not being examined against) and the NPPG 2024 propose a new standard method for assessing housing needs (NPPG Paragraph: 004 Reference ID: 2a-004-20241212). The NPPG was revised with a new standard method on 12 December 2024, the day after the Sandwell Local Plan was submitted to the Secretary of State for examination. The new standard method sets a baseline at 0.8% of the existing housing stock for the area which equates to 135,759 dwellings in Sandwell (as at 2023). The new method makes an adjustment to take account of affordability¹ (using data published in March 2025) and results in a **reduction** of the annual housing need in the borough from the old to the new standard method, from 1,550 to 1,367 dwellings per annum (a reduction of 183) and a reduction from 26,350 to 23,239 housing need over the plan period 2024 -2041. This figure may change with the publication of the updated housing stock figures expected in May.

The Council contends that the correct local housing need figure for the Sandwell Local Plan is 26,350 homes over the plan period, using the formula set out in the previous version of the National Planning Practice Guidance. The housing requirement for the Sandwell Local Plan is supply-based and totals 10,434. Therefore, the housing requirement for the plan would not change even if the new standard method were used to calculate the borough's housing need over the plan period. It would, however, have implications for the quantum of unmet housing need arising from the Local Plan.

b. No. The NPPG, as set out in the Housing Topic Paper [SA/ED24], highlights that regard must be had to what is deliverable and viable. It also highlights that market-led schemes are not the only source of affordable housing provision, with the Council having a housing building programme of 547 homes. Furthermore, it acknowledges that no strategic employment growth has been identified. Therefore, the standard method figure is appropriate for calculating housing need and an alternative figure should not be used.

c. Yes. In line with the NPPF, the size, type and tenure of housing needed for all groups have been assessed through the Housing Market Assessment. This was first carried out in 2021 as part of a joint study for the Black Country Plan [HOU/002] and was then updated in 2024 specifically for Sandwell MBC

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<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearninglowerquartileandmedian>

[HOU/001].

The assessment considered the individual profiles of the specific groups of the population and provided information on their future requirements. It looked at the following groups:

- older persons,
- people with disabilities,
- family households,
- people who want to build their own homes

and this information was used to shape a range of policies within the plan. The SLP includes policies that will ensure that the housing needs of these groups will be met, including Policies SHO3 (to ensure the right mix of housing), SHO4 (to deliver affordable housing), SHL5 (to deliver accessible and self / custom build housing), SHO6 (to protect family housing) and SHO10 (to deliver housing for people with specific needs).

d. Yes, the assessments of land capacity for residential development along with the site selection methodology and allocation process are considered sufficiently robust, consistent with national policy and based on evidence.

Table 1 of the Site Assessment Report [SAA/001, page 4] summarises the method used for site selection.

Firstly, the supply of possible sites was identified from existing planning permissions and allocations, and from the SHLAA [HOU/003]. This followed the methodology set out in National Planning Practice Guidance by identifying a wide range of potential development sites, including:

- brownfield or previously developed land;
- vacant or underused public land;
- sites promoted through the call for sites process and other opportunities in regeneration areas;
- additional floorspace in centres; and
- an allowance for small windfalls.

Secondly, sites were filtered out if they were impacted by thirteen identified gateway constraints including Strategic Open Space, Flood Risk Zone 3 and Green Belt.

Employment sites that scored more than 20+ in the Black Country Employment Area Review (BEAR) [ECON/003-5], or land identified as preferred areas for new waste facilities, or strategic waste sites were also excluded.

Next, sites were filtered out if they were unavailable, had a significant planning constraint that cannot be mitigated, already formed part of a current masterplan, or had an extant planning permission for an alternative use on a currently allocated site.

Sites included within current masterplans have already been assessed as part of the masterplanning process and are considered appropriate for allocation.

The remaining 182 possible sites were then assessed against a consistent set of criteria. using a RAG rating Please see the Site Assessment Report [SAA/001] for detail of the criteria used and how the RAG ratings were set up. Each site was subject to a Sustainability Appraisal, using a consistent method set out at Appendix D of the Regulation 19 Sustainability Appraisal [SUB/008]. The viability and deliverability of each site was considered, and any shown not to be viable or deliverable were removed or had a capacity discount applied.

The results of the Site Assessment Report informed what sites were selected for allocation in the Sandwell Local Plan and for what land use.

Site capacity has been calculated using a consistent approach to density assumptions as set out in Policy SHO3, where higher densities are expected in the strategic and town centres and near transport hubs. Further information is provided in the Density and Design Topic Paper [SA/ED8].

Please see the council's response to MIQ 1.10(c) and Q3.1(a)(i) in relation to how constraints to development within the borough have influenced the Plan's overall spatial strategy.

e.i Sandwell contains a relatively small area of green belt, concentrated around Sandwell Valley (around 9% of the total area of Sandwell, compared to Dudley's [18%] and Walsall's [38%] quanta of green belt in particular). This was not considered as a reasonable alternative solution to address housing or employment shortfalls because it serves a number of additional purposes as well as being designated as green belt – providing land for recreational, environmental / ecological, agricultural, major infrastructure and climate change mitigation purposes. In addition, it contains various hard constraints and other designations that would be adversely affected by development. Further, given its location it serves a strong purpose in preventing the coalescence of adjacent built-up areas.

a) The Green Belt study was completed in 2019 for the Black Country Authorities as part of their work on the Black Country Plan. Although the original study is now five years old, the Council considers it reliable because nothing has altered in Sandwell's Green Belt, and the boundaries have remained the same.

Recently, Sandwell Council reviewed this study after receiving an application for housing development on a site within the Green Belt. As part of this reconsideration, the Council commissioned a review of that part of the study focussing on the appeal site. The review confirmed that the original findings still apply, as no relevant changes have occurred. The appeal decision (July 2024) has been included as evidence [SAA006]. It clearly indicates that the Council's approach to the retention and protection of green belt is appropriate and its assessment of the importance of green belt to the borough is reasonable. Although the decision refers to a specific site and proposals (not under consideration in the SLP), the Council would suggest that, given the appeal inspector acknowledged the housing shortfall and still dismissed the appeal, this reflects the strategic importance of Sandwell's green belt and highlights the role it performs.

The Inspector is respectfully directed to the Environment Topic Paper [SA/ED7] and its Appendix 5 [SA/ED7E] for further consideration of the role and purposes of the Sandwell green belt and the potential harm that would be caused should development take place within it. Please also see the Council's response to Q3.1(a)i for further discussion on the role of constraints including the green belt.

The Environment Topic paper (chapter 4 – Green Belt) contains further details of various designations and their broad location within Sandwell's green belt. In brief, paragraphs 4.11 - 4.12 of SA/ED7 and the associated diagrams identify that of the 820ha of green belt within Sandwell, around 446ha of it are covered by constraints, including SINC's, local nature reserves, flood zone 3, the motorway, the Ray Hall Sewage Works, a substation, registered parks, ancient woodland, a burial ground and a scheduled monument. Some of the constraints inevitably overlap, demonstrating the complex nature of the area.

NPPF paragraph 145 states,

“there is no requirement for Green Belt boundaries to be reviewed or changes when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries are fully evidenced and justified.”

The Council do not consider that exceptional circumstances have been triggered, and the Green Belt boundaries are not proposed to be altered in the SLP. The Spatial Strategy and other topic papers supporting the SLP indicate that exceptional circumstances do not exist.

- f. Yes, all reasonable and realistic sources of housing land supply have been comprehensively explored and assessed in accordance with national policy and guidance. A detailed SHLAA has been conducted, covering all potential sites. A call for sites process was undertaken, inviting landowners and developers to identify additional deliverable land. All sites put forward were assessed against the site selection methodology [SAA001]. Regeneration areas were fully explored for development opportunities, densities assumptions were reviewed and where appropriate, higher densities have been used. A justified allowance for windfall development has been included, based on past trends for small sites. An assumption was made for additional floorspace in town centres being deliverable for housing as set out in the Housing Topic Paper [SA/ED24].

Furthermore, the WMCA Brownfield land study 2022 [WMCA001] concluded that the sites selected for housing in the BCP were appropriate, it also found that those sites that were assessed and not selected for housing represented the correct approach. It outlined that more work could be undertaken on centres to determine if there was any potential for additional capacity within them for housing. The council carried out this extra work and it is included in the Housing Topic Paper [SA/ED24] and Table 5 of Policy SHO1.

The plan sets a realistic and deliverable housing requirement, based on the above evidence along with land supply constraints. Whilst it is below the identified housing need, it represents the maximum achievable housing delivery in a sustainable manner and is consistent with the NPPF which allows for a housing requirement below the Local Housing Need where fully evidenced constraints exist.

- g. Yes, the SLP housing requirement is both justified and positively prepared.

The requirement is informed by the SHMA and SHLAA, which identify the need and assess the capacity of the borough to accommodate growth. Where gateway constraints existed, those sites were not assessed as set out in the site selection methodology paper.

It reflects the maximum number of homes that can be sustainably delivered within the plan period. The Plan includes policies to support regeneration, promotes small sites and windfall delivery and encourages appropriate densities in accessible locations.

Discussions with neighbouring authorities has been proactive and ongoing. Statements of Common Ground have been produced and set out whether any unmet need can be accommodated elsewhere.

The requirement is positively prepared (it seeks to meet needs as far as possible), justified (based on proportionate evidence), effective (deliverable over the plan period) and consistent with national policy (supports sustainable development).

Q2.4 In terms of this issue, are any main modifications necessary for soundness?

While the Council is satisfied that it has submitted a sound plan, should the Inspector be minded to recommend any further modifications without which she would consider the SLP to be unsound, the Council would be pleased to receive them.

Issue 2c – Whether the assessment of need and the plan's overall scale of growth for accommodation for Gypsies, Travellers, and Travelling Showpeople is justified, positively prepared, effective, and consistent with national policy.

Note: Q2.5 – 2.7 concern the overall level of need and overall amount of accommodation for the travelling community included in the plan (the number of pitches and/or plots), and the soundness of other aspects of Policy SH09 and relevant allocations in the plan will be considered under other Matters.

- Q2.5** Does the Black Country Gypsy and Traveller Accommodation Assessment (HOU 004) provide a robust assessment of accommodation needs in the Sandwell plan area for the travelling community, is it sufficiently up to date, and does it apply an appropriate methodology in establishing the borough's requirement for additional pitches and /or plots?

The BC Gypsy and Traveller Accommodation Assessment (BC G&T AA) does provide a robust assessment of accommodation needs having been produced by RRR Consultancy using an established

methodology which was consulted on which complies with policy and legislation and uses a combination of data sources including review of secondary information including Housing and Communities Traveller Caravan Count to determine trends in the population of Gypsies and Travellers; online and telephone interviews with key stakeholders providing qualitative data regarding accommodation needs of Gypsies, Travellers, and Travelling Showpeople; and extensive face to face and telephone surveys covering a range of issues related to accommodation and service needs.

An appropriate methodology was used in establishing the requirement figure, which was consulted on with stakeholders. It used information from the local authority, the census and evidence from the survey including: number of Gypsy and Traveller housed in bricks and mortar accommodation; number of existing Gypsy and Traveller pitches; number of families residing on unauthorised encampments requiring accommodation; number of unauthorised developments; number of temporary pitches; number of vacant pitches; number of planned or potential new pitches; number of transit pitches, new family units expected to arise from elsewhere, from within existing family units and those with a psychological aversion to housed accommodation. In establishing the need for Travelling Showpeople, consultation was undertaken with Travelling Showpeople households and also with the Showmen's Guild of Great Britain and the Association of Circus Proprietors of Great Britain. Consultation covered issues such as family composition (per plot), occupancy of existing plots, management and suitability of current yards and plots, travelling patterns and accommodation needs.

The study was undertaken in 2022 as evidence for the BCP, the timeline for the plan at that time was to 2039 and this was reflected in the study. As set out in the Gypsy and Traveller Topic Paper [SA/ED25 paragraph 4.4], following the demise of the BCP, the consultants agreed that to extend the GTAA timeframe from 2039 to 2041 would result in one additional pitch and plot requirement [SA/ED39].

Therefore, it is considered that as the study is only three years old that it is sufficiently up to date.

The Spatial Strategy [SA/ED42] looked at three options for site provision and found Option B to be the most realistic option as it would deliver the required five-year supply and have the least impact.

Q2.6 Does the plan provide for all needs identified in the Black Country Gypsy and Traveller Accommodation Assessment? If so, how?

- a) Is the plan's approach justified, positively prepared, and consistent with relevant national policy including Planning Policy for Traveller Sites?
- b) Is the level of need and the plan's requirement for any additional pitches and/or plots clearly set out in the plan?
- c) Should the plan include any additional site allocations to meet the identified needs over the plan period?
- d) Overall, is the plan's requirement for accommodation for Gypsies, Travellers and Travelling Showpeople justified and positively prepared?

a. Yes, the policy has been positively prepared and is consistent with national policy. The council has assessed the need for Gypsy, Traveller and Travelling Showpeople provision and have consulted with stakeholders. It assessed all options for accommodating the needs for G&T and Travelling Showpeople and has sought contributions from neighbouring authorities through the Duty to Cooperate, for the shortfall in meeting the need. SHO9 includes a criteria-based policy to support appropriate sites coming forward.

b. In the justification of Policy SHO9 paragraph 7.75 sets out the need for pitches up to 2031 as 8 pitches and from 2031 to 2041 as 6 pitches. Paragraph 7.79 sets out the need for Plots as 32. Table 9 provides information on the supply of pitches to 2031 but is not clear on how this relates to the total need to 2041. This could be made clearer through minor modification by adding columns to the table to show need and supply to 2031 (five-year supply) and 2031 – 2041.

c. The Gypsy and Traveller Topic Paper [SA/ED25] paragraph 6.9 and the Housing Topic Paper

[SA/ED24] paragraph 4.13 set out the various steps that have been undertaken to identify land for additional pitches/ plots. However, no new land supply has been identified, and no sites were submitted for consideration by the Gypsy and Traveller communities themselves.

For clarity, paragraph 4.14 of the Housing Topic Paper refers to a further site submitted to the Regulation 19 consultation. This site is at Tippity Green, which is subject to a Main Modifications consultation. It is proposed for residential development.

- d. Yes, it has been positively prepared as the Council has looked at all options to accommodate pitches / plots.

Q2.7 In terms of this issue, are any main modifications necessary for soundness?

While the Council is satisfied that it has submitted a sound plan, should the Inspector be minded to recommend any further modifications without which she would consider the SLP to be unsound, the Council would be pleased to receive them.

Issue 2d – Whether the assessment of employment need and the plan’s overall scale of employment growth is justified, positively prepared, effective, and consistent with national policy.

Note: This issue concerns the overall level of need for employment land and the amount of land for employment included in the plan. The soundness of other aspects of Policy SDS1 and the plan’s other policies and allocations relating to employment and the economy will be considered under other Matters.

Q2.8 Is the plan’s approach of maintaining ongoing provision of around 1,221 hectares of allocated employment land soundly based? Including:

- a) Do the key evidence base documents for economy and employment (ECON 001 to ECON 007 with Topic Paper summary SA/ED18) provide a robust and sufficiently up to date assessment of employment needs in Sandwell over the plan period?
- b) On what basis has the figure of 1,221 hectares been derived and do the evidence base documents justify this level of provision in the plan?
- c) Does the plan include sufficient site allocations to meet its requirement to maintain the ongoing provision of 1,221 hectares of allocated employment land?
- d) Have all reasonable options for meeting the identified need for employment land, and reducing the shortfall over the plan period, been robustly explored?
- e) Overall, is the plan’s employment requirement justified and positively prepared?

- a. The inspector’s attention is respectfully drawn to the submitted Employment Land Topic Paper, which sets out the Council’s thinking and approach to (among other issues) the importance of addressing the economy and employment.

The Council has addressed this requirement directly, through the commissioning of work on a series of detailed economy and employment policies that are designed to facilitate economic growth. Policy SEC1 provides the strategic context for this approach.

The evidence base in the form of the following documents:

- Economic Development Needs Assessment (EDNA) [ECON002, ECON002A]
- Employment Land Needs Assessment (ELNA) [ECON001], the update to the EDNA 2022 [ECON002],
- Black Country Employment Area Review (BEAR) [ECON003],
- Employment Land Supply Paper [ECON006, ECON006A],
- West Midlands Strategic Employment Sites Study (ECON007)

provide a robust and sufficiently up to date assessment of employment needs in Sandwell over the plan period up to 2041.

Employment demand - Black Country Employment Area Review (EDNA)

The EDNA represented a robust and up to date assessment of employment needs in Sandwell drawing on a series of methods and checks. For example, future industrial (B2 and B8) land needs' assessment within the 2022 EDNA [ECON002] and 2023 ELNA [ECON001] were calculated drawing on multiple data and information, including:

Regional GVA provided by Oxford Economics to the Black Country Consortium (now the Economic Intelligence Unit) have been translated into industrial needs for the period 2020-2041.

Regional / Black Country GVA figures (produced by the Office for National Statistics ONS) over the period 1998/99 – 2020.

These baseline forecasts were 'sense checked' against trends in past completions and employment land inquiries and developments to ensure that future planning reflected local conditions (with projections on past completions based on the past development levels with the average projected forward).

Moreover, and as discussed in the Topic Paper summary [SA/ED18], the Black Country Local Authorities (BCLAs), including Sandwell, commissioned Warwick Economics & Development Ltd. (WECD) to further review the figures/conclusions in the light of new economic forecasts produced by the Oxford Economics in January 2024 to reflect post-pandemic conditions and assumptions for the future. Therefore, the latest EDNA assessment produced by WECD [ECON002A]:

- provides an update of the 2017, 2021 and 2023 revisions of the EDNA,
- represents a sufficiently up to date and robust assessment of employment needs in Sandwell, and
- has informed the Local Plan for the plan period.

Forecasts for future employment land requirements across the Black Country were discussed with all four BCLAs. Estimates for each BCLA also included an equal allocation of the demand for employment land generated in the Black Country and traditionally accommodated (completed) within South Staffordshire.

In addition, in meeting the shortfall and to plan ahead realistically, the four BCLAs are committed to ongoing engagement with each other and with those neighbouring local authorities identified as having a strong or moderate economic relationship with the Black Country functional economic market area (FEMA), and other areas with which there is an evidenced functional relationship.

The Black Country Employment Land Review (BEAR) [ECON003]

The overall purpose of this Study is to assess the suitability of existing employment land across the Black Country for continued business and industrial use and presents the most up to date represents a robust and up to date assessment of existing employment land in Sandwell.

The Study reviews the stock of existing operational employment land which is already in use, identifies what is suitable to retain and what can be released to other uses, notably housing. The Study is not concerned directly with the identification of currently vacant land for new employment development; this has been considered in all the Employment Development Needs Assessments (EDNA) and associated Employment Land Supply statement.

A key objective of the SLP was to ensure that there was sufficient employment land to meet the job needs of residents and the accommodation requirements of businesses over the period of the plan to 2041.

For the purposes of the Study, employment land consists of land for factories, warehouses, logistics and other uses that need to locate in industrial areas (trade wholesale, depots, car sales / repair garages, waste management). The 2017 EDNA recommended that the Black Country Plan should maintain the distinction between strategic high-quality employment land and local employment land.

This recommendation has been carried over into the Sandwell Local Plan.

The Employment Land Supply Paper

The Employment Land Supply Paper (November 2024) provides a position statement on Black Country Employment Land supply (2020- 2041 and 2020-2042). The paper uses a robust, logical step-by-step approach to show how the local authorities have examined existing and forecast future land availability to meet identified needs. The approach is consistent with the guidance on Housing and Economic Land availability assessments set out in Government Planning Practice Guidance ([Housing and economic land availability assessment - GOV.UK](#))

In late 2022 it was agreed that work on the BCP would cease, and that the individual BCLAs would produce their own Local Plans. Since then both Sandwell Council, Dudley Council and City of Wolverhampton Council have published Regulation 18 and 19 Plans for consultation. Walsall Council is also progressing a Local Plan with publications dates yet to be determined. However, for the purposes of employment land, given the close physical and functional economic relationships between the BCLAs, and the nature of the joint evidence base prepared to date, the BCLAs are continuing to work together through the Duty to Cooperate to ensure that future needs continue to be forecasted and, where possible accommodated, on a Black Country-wide geography, corresponding to the Functional Economic Area confirmed in the 2021 Black Country Economic Development Needs Assessment.

The context for this paper is the Black Country Economic Development and Needs Assessment (EDNA) prepared by WECD consultants in 2017 with further updates in 2021, 2022, 2023 and 2024. The 2023 update (Employment Land Needs Assessment 2023) [ECON001] identified a range of economic growth scenarios for consideration in the preparation of Local Plans.

West Midlands Strategic Employment Sites Study

The West Midlands Strategic Employment Sites Study 2023/24 is the most up to date piece of work reviewing strategic employment sites in the West Midlands, intended to inform local plan making. As noted in the Topic Paper summary [SA/ED18], the study did not identify any sites in Sandwell that could be considered as strategic; the largest employment site available for employment development is 7 hectares, although there are several industrial / warehouse units in the borough over 9,300 sqm. The study did identify that Sandwell has a significant proportion of employment in manufacturing (17.2%) and relatively high employment in the wholesale sector (7%) compared to other districts in the study area. See below

The EDNA employment land needs assessment allocations between B2 and B8 are based on:

- Oxford Economics (OE) Gross Value Added (GVA) forecasts, which suggests 32% coming from manufacturing and 68% from storage & distribution
- A split of enquiries and developments across the Black Country that indicated a similar distribution between B2 and B8 (detailed information provided in EDNA 2017 and 2021)
- Employment / floorspace density ratios, e.g., employment / floorspace density ratios for manufacturing are generally taken to be circa 36m² per employee while the equivalent figure for storage and distribution-type uses is 77m².

b. The 1,221 hectares of employment land allocated in the Plan has been identified through the EDNA and BEAR work.

Sandwell Employment Land Supply (Matter 2 Appendix 1 – Sandwell Employment land – November 2023 Spreadsheet provides a breakdown of the allocated SEC1, SEC2, SEC3 and SEC4 site allocations).

- SEC1 Sites – 28 hectares (This figure of 28 ha of vacant employment forms part of the total supply of 42 hectares, the remaining 14 ha of supply is past completions from 2020 to 2024)
- SEC2 Allocations – 234 Hectares

- SEC3 Allocations – 931 hectares
- SEC4 Allocations – 28 hectares

Economic Development Needs Assessment (EDNA)

The EDNA 2017, 2021, 2022, 2023 and 2023A [ECON001, ECON002 and ECON002A] established the supply (availability and suitability) of employment land to meet future growth, along with associated Employment Land Supply papers for 2020, 2023 [ECON006] and 2024 [ECON006A].

To establish, the supply (availability and suitability) of employment land to meet future growth, the following tasks have been undertaken, as follows:

- Review of local plan allocations.
- Assessment and scoring of sites of potential employment use - based on a combination of review of documentation relating to various sites (e.g. with planning permissions, in the Green Belt, etc.) and site visits. Employment land within these locations has been examined to ascertain market attractiveness and whether the site may be suitable or not for employment-related development (27 sites across the Black Country were reviewed by Colliers International).
- Review of other local studies including the West Midlands Strategic Rail Freight Interchange study and employment land studies produced by adjacent authorities

The Employment Land Supply Paper and Black Country Plan Site Assessment Report provide more detail around the method used for the sites' assessment and site by site assessment undertaken as part of this process. These documents also include those sites that were not considered suitable for employment use.

For Sandwell the EDNA identifies 28 hectares of currently vacant employment that was assessed as suitable for future employment development up to 2041. The sites that were considered suitable in the EDNA form the basis for the Policy SEC1 sites in the Plan. The SEC1 sites were either previous allocations carried forward from the Site Allocations Document 2011 or sites submitted through the Call for Sites process.

The potential supply of sites in Sandwell also includes estimates of supply generated through windfall development on existing sites. Assessment of past completions has informed estimates of anticipated 'windfall' supply generated through intensification / recycling. Since 2021, there has been 51 hectares (gross) of industrial development has taken place on existing (45 sites) occupied employment land. Development has either been in the form of extensions to existing buildings or demolition of existing buildings and new premises built in their place. Of the 51 hectares developed only 11.8 hectares was on net additional land, which was allocated for housing in the Site Allocations Document 2011.

The overall purpose of this Study is to assess the suitability of existing employment land across the Black Country for continued business and industrial use. The Study reviews the stock of existing operational employment land which is already in use, identifies what is suitable to retain and what can be released to other uses, notably housing. The Study is not concerned directly with the identification of currently vacant land for new employment development; this being considered in the Employment Development Needs Assessments (EDNA) (2017 and 2021) and associated Employment Land Supply statement.

Black Country Employment Area Review

The Study has provided a balanced, robust and detailed assessment of the quality of the Black Country's employment areas. It updates the work prepared for the Black Country Core Strategy taking into account the findings and recommendations of the 2017 and 2021 EDNA.

The overall purpose of this Study is to assess the suitability of existing employment land across the Black Country for continued business and industrial use. The Study reviews the stock of existing operational employment land which is already in use, identifies what is suitable to retain and what can be released to other uses, notably housing. The Study is not concerned directly with the identification

of currently vacant land for new employment development; this being considered in the Employment Development Needs Assessments (EDNA) (2017 and 2021) and associated Employment Land Supply statement.

All existing operational employment sites over 0.4 hectares (see Matter 2 Appendix 1 Sandwell Employment Land – November 2023 Spreadsheet) across the borough were mapped as part of the BEAR assessments and this provides a total of 1,193 hectares of employment land to be allocated in the SLP. Of this total, 234 hectares is allocated as Strategic Employment Land (SEC 2 sites), 931 hectares as Local Employment Land (SEC 3 sites) and 28 hectares as other employment land (SEC 4 sites).

The outputs from this Study together with other evidence base studies, the consultation responses from the Issues and Options consultation and the Sustainability Appraisal will inform the preparation of the Regulation 18 (Draft Plan) stage of the Sandwell Local Plan.

The approach to identifying Strategic Employment Areas ensures that the very best quality employment areas in the Black Country are safeguarded for key manufacturing and logistics activity critical to the recovery and growth of the Black Country Economy. The Study also recommends that large tracts of Local Employment Areas are viable and sustainable locations for a wider range of economic activity and businesses.

The work confirms that a number of employment areas have a limited economic role and are suitable for 'release' to non-employment uses. The quantum of land recommended for release to alternative uses is far less than contained in current Local Plans (Black Country Core Strategy and Sandwell Site Allocations Development Plan Document), recognising that many of these areas have a viable and sustainable future as locations for continued employment activity.

The Employment Land Supply Paper 2023

This paper (ECON 006) forms part of the evidence based to support the preparations of the individual Local Plans produced by the Black Country Local Authorities. The overall purpose of the paper is to provide a definitive position statement on employment land supply to meet future needs.

Over the period 2020 – 2022, 24.6 hectares of land was built out for employment uses in Sandwell, equating to 12.30 hectares per annum. Of this only 9.7 hectares was net additional land.

Sites of less than 0.4 hectares provide a relatively small but constant supply of employment land supply. These are sites which fall below the threshold for allocation in Local Plans, but which will continue to come forward as "windfall" opportunities. For the period 2020-2022 small site completions provided 2.7 hectares of net attentional land across the Black Country. Over the period 2022-2041 it is projected that small site completions could provide some 7.8 hectares of additional employment land towards meeting the 2022-2041 employment land need.

In addition to small sites, over the lifetime of the Plan other sites will come forward for employment development through the bringing forward of sites across the Black Country not currently identified as a development opportunity in either Local Plans or at the time of the Regulation 18 BCP. This will arise from three principal sources - the development of currently vacant land not allocated for employment, the redevelopment of non-employment land and premises (such as commercial leisure and surplus retail units) and the recycling of non-operational land within existing employment areas.

Of employment land completions within the Black Country 2016 - 20, these sources provided 14.6ha of net additional employment land; 56% was in Sandwell.

The 2016-20 rate of development equates to circa 3.7ha per annum, or 70.3ha to 2041 if this trend continues. Experience from 2020-24 shows that this trend is continuing at a slightly increased pace, but it is considered that a cautious approach is more appropriate to be subject to ongoing monitoring over the respective Local Plan periods.

The landowner engagement carried out as part of the BEAR showed that while there are areas of under-occupancy, on the majority of these sites this is not an indication that these areas are surplus to

medium to long term business needs and they can provide a source of land within which the allowance for recycling outlined above can occur. It is therefore considered that this is a reasonable assumption which can be factored in on future land supply.

Much of Sandwell's new development over the last ten years has been on existing employment sites. Companies wishing to expand their current operations have done so on their existing sites. This has involved either the demolition of their existing premises and the building of newer modern industrial units or they have expanded the existing units. There has been new industrial development of sites that were previously allocated for housing in the Site Allocations Document 2011. Given the nature of Sandwell employment land supply going forward, it is expected that given the shortage of available employment land that the churn of employment land will continue over the life of the Sandwell Local Plan.

- c. The NPPF and NPPG require that planning policies should be informed by regular reviews of land allocated for development in development plans and of land availability. Plans should recognise the role of existing occupied employment land and premises in supporting economic growth, and the operational requirements of landowners is recognised as a key consideration in understanding development potential. Land which is needed to support key economic sectors should be retained for employment uses.

It is considered that the plan contains sufficient allocated employment land to meet the requirement of maintaining the ongoing provision of 1,221 hectares up to 2041 (see Matter 2 Appendix 1 Sandwell Employment Land – November 2023 Spreadsheet for a breakdown of allocated employment sites).

Sandwell Employment Land Supply

- SEC1 Sites – 28 hectares (This figure of 28 ha of vacant employment forms part of the total supply of 42 hectares, the remaining 14ha of supply is past completions from 2020 to 2024)
- SEC2 Allocations – 234 Hectares
- SEC3 Allocations – 931 hectares
- SEC4 Allocations – 28 hectares

- d. Yes, all reasonable options have been considered in meeting the shortfall, through the work informing the EDNA and by undertaking the Duty to Co-operate process through the Black Country FEMA.

In meeting this shortfall, the four Black Country authorities will continue to progress engagement through Duty to Cooperate with neighbouring local authorities identified as having a strong or moderate economic relationship with the Black Country FEMA, and other areas where there is an evidenced functional relationship.

Economic Development Needs Assessment (EDNA)

The original principal aim of the 2017 EDNA report was to provide updated evidence regarding the economic and employment land demand estimates in the Black Country.

- The assessment is compliant with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) and delivers the following objectives:
- Presents the most up to date economic and spatial picture of the Black Country including trends and policies that are likely to influence future demand and supply of industrial space across the area as a whole and the constituent authorities.
- Explores and defines the Functional Economic Market Area (FEMA) of the Black Country and highlights cross-border issues relating to the area's economy, property market, labour market and infrastructure.
- Provides estimates of economic growth and industrial land use projections to 2031 and 2036 and explores various scenarios of future demand for industrial space in the light of growth

aspirations as set out in the Strategic Economic Plan for the Black Country and past development trends.

- Presents an assessment of existing and future supply of land available for economic development needs and its sufficiency and suitability to meet identified needs including where there are gaps in the current portfolio in quantitative and qualitative terms.
- Draws conclusions to help the Black Country review the existing policy approach and potentially develop new policies to meet the future growth of the area

The 2022 assessment provides an update of the 2017 EDNA and the 2021 revision of the EDNA while also drawing on new economic forecasts produced post-pandemic.

The 2022 EDNA aimed to establish the objective assessment of employment land needs for the Black Country to 31 March 2040 (a twenty-years' planning period) and was commissioned to inform the Black Country Plan which was a joint Local Plan by the four Black Country authorities. In October 2022 the Councils agreed not to proceed with the Black Country Plan and for the individual local authorities to prepare their own individual Local Plans.

As a result, the 2022 report was used to inform the preparation of the individual Local Plans and the approach that the Council's take to meet the Duty to Cooperate across the Black Country Functional Economic Area (FEMA).

The 2023 report updated employment land demand and supply estimates produced in a 2022 revision of the 2017 and the 2021 Employment Demand Needs Assessments (EDNA). The 2022 revision reviewed and established the Black Country Functional Economic Area (FEMA) and relied on new economic forecasts produced post-pandemic to produce an objective assessment of net additional employment land needs assessment to 31 March 2040.

This revision of the 2017 and 2021 EDNA reports (and the update that was produced in November 2022) provided new employment forecasts and employment land estimates to inform updates of individual Local Plans, drawing on new information on supply of employment / industrial land across the four local authorities and employment growth forecasts up to 2041. The latter have also been sense checked using updated data related to past completions (as provided by the four BCLAs), and a review of new or potential project developments that could impact on growth in each of the four local authorities.

The 2024 update was needed to provide forecasts over two planning periods, 2020-2041 and 2020-2042. Moreover, there have been some significant changes in the underlying Oxford Economics (OE) forecasts (produced in January 2024) compared to the previous set of forecasts (which were used to inform the EDNA 2023 calculation). These new forecasts, for example, forecast a reduction in the working age population between 2020-2042. This reduction is not supported by population forecasts produced by ONS that in fact show that the working age populations are projected to increase in all four Black Country Local Authorities (BCLAs).

The purpose of this paper was to confirm 'current' employment land supply and set out the process by which new sources of supply have been identified for inclusion in the Local Plans. The paper uses the following step-by step process:

- Review of existing Local Plan allocations and sites with planning permission for employment development.
- Identification of new sites within the urban area identified through the Black Country Plan and individual local plan site assessment process.
- Land in neighbouring areas either allocated in local plans or with planning permission that could meet Black Country needs.
- Identification of new sites in the Black Country green belt identified through the Black Country Plan and individual local plan site assessment process including in response to the Call for

Sites

The 2024 report concluded that the work has identified some 377.4ha of land within the Black Country that can contribute towards meeting identified needs to 2041, and 387ha of land to 2042.

The 2041 shortfall is therefore 257.2ha and the 2042 shortfall is 280.4ha. For Sandwell up to 2041 the employment land need is 229.5 hectares, and the supply is 44.5 hectares, which leaves a shortfall of 185 hectares up to 2041.

The four local authorities will continue to progress engagement with each other and with neighbouring Local Plans identified as having a strong or moderate economic relationship with the Black Country functional economic market area (FEMA) and other areas with which there is an evidenced functional relationship.

The 2024 Employment Land Supply Technical Paper confirms this to be 142.2ha from the Shropshire and South Staffordshire Local Plans. These contributions reduce the shortfall to 115.15 to 2041 and 138.25 to 2042.

Since the 2024 Employment Land Supply was written the 30 hectares of employment land from Shropshire towards the Black Country FEMA has been withdrawn; the shortfall increases to 145.15 hectares to 2041 (see **Q1.3**).

Black Country Functional Economic Market Area (FEMA)

The Black Country FEMA was originally established in the Black Country EDNA 2017. The extent of the FEMA was subsequently reviewed and confirmed in the EDNA update 2022. This work showed that the Black Country FEMA primarily comprised the four Black Country Local Authorities (BCLAs), based on the established socio-economic, market and administrative relationship between them. Birmingham and South Staffordshire are also deemed to have strong economic interactions with the four Black Country authorities. The EDNA 2017 also recognised other economic interactions with additional local authorities located around the Black Country, including Wyre Forest, Bromsgrove, Solihull, Tamworth, Lichfield and Cannock Chase.

The FEMA Statement of Common Ground (SoCG) [SA/ED36] records cross boundary engagement to address the unmet employment needs arising in the FEMA. The SoCG is agreed between the local authorities within the FEMA that have strong or moderate economic transactions with the Black Country, and other local authorities where evidence shows there is a functional economic relationship with the Black Country. The SoCG records their co-operation and progress towards addressing the strategic matter of the unmet employment land need arising in the Black Country.

The SoCG demonstrates how the participating local authorities have engaged constructively, actively and on an ongoing basis to comply with their Duty to Cooperate.

The Black Country Plan began its preparation process in summer 2017, with the publication of an Issues and Options consultation to commence the review of the Plan. This initial document, based upon the Black Country EDNA 2017, identified a gap between employment land needs and supply of up to 300ha across the Black Country. Since then, the employment land shortfall identified by the Black Country authorities has altered in its exact amount but remains significant at around 260ha to 2041 in 2024.

The Association of Black Country Authorities sent further correspondence in August 2020 to neighbouring local authorities and those within the GBBC housing market area, outlining a shortfall of employment land from the Black Country.

The evidence that informed the Draft Black Country Plan consultation in 2021 indicated that the employment land shortfall had fallen since 2017 but remained significant, at around 210ha of land to be exported through the Duty to Cooperate process. The Draft Plan suggested this should be addressed through an update to the Black Country EDNA and distributed to authorities with a strong existing or potential functional economic relationship with the Black Country.

In April 2022 the Association of Black Country Authorities wrote to neighbouring local authorities and those within the GBBC housing market area. This letter requested clarification that all opportunities to accommodate unmet employment land needs had been explored through the preparation of their local plans. The letter also asked these local authorities to participate in an update to the West Midlands Strategic Employment Sites Study 2021. This letter also indicated that the Black Country employment land shortfall had fallen to around 108ha, through the contributions to the BCLAs from the West Midlands Interchange and the proposed contribution from Shropshire Regulation 19 Local Plan.

In October 2022, the Black Country Councils confirmed that work on the Black Country Plan had ceased, and that the four Council's would be preparing individual Local Plans. Evidence to support these individual Local Plans has been updated through the Black Country EDNA 2022, the Employment Land Need Assessment 2020-2041 (October 2023) and the Black Country Economic Development Needs Assessment Update (November 2024). This most recent update confirms an employment land shortfall of 257.35ha to 2041

The Black Country EDNA 2017 and 2021 concluded that the four Black Country local authorities comprise a separate and self-contained FEMA. It also identified eight local authority areas outside of the Black Country's FEMA with strong or moderate functional economic links with the Black Country.

For employment land, due to the strong economic relationships evidenced through the studies outlined above, the BCLAs will continue to work together so that any surpluses of land against locally generated need within one BCLA will contribute towards meeting needs across the FEMA as a whole, and contributions from local authorities outside the FEMA similarly apportioned to meeting FEMA wide needs and not 'allocated' to the individual BCLAs.

Duty to Cooperate discussions to date have agreed a contribution from South Staffordshire of 112.2 hectares (minimum) to the Black Country FEMA to help met the unmet need in the Black Country. South Staffordshire has been clear in Duty to Co-operate correspondence since 2018 that it will contribute surplus employment supply above its own needs to reduce the unmet needs of the Black Country authorities.

There is considerable variety in the progress and status of local plans across the Black Country FEMA, those areas with strong or moderate economic transaction with the Black Country and other areas with a functional economic relationship with the Black Country. The position on the unmet employment land needs of the Black Country is likely to change over time as plan-making within that area progresses.

The Black Country authorities will continue to approach authorities where contributions have not been secured to request evidence of ability to assist with unmet employment needs.

The West Midlands Strategic Employment Sites Study 2023/24 [ECON007]

One of the main aims of the Study was about the identification of strategic sites and was intended to inform local plan making. For business to grow and inward invest to take place, creating jobs and GVA growth, land needs to be available. As an indication the typical size of site considered was 25 hectares. Sandwell was ruled out as a location to be looked at due to the lack of available sites that met the minimum size threshold of 25 hectares. The largest available employment site for development in the Borough is 7 hectares.

The study did identify that Sandwell has a significant proportion of employment in manufacturing (17.2%) and relatively high employment in the wholesale sector (7%) compared to other districts in the study area.

WMCA Brownfield land study [WMCA001]

The Study was commissioned by the West Midlands Combined Authority (WMCA) and produced by Chilmark Consulting. The aim of the Study was to prepare an independent assessment of the brownfield land capacity for housing in the Black Country.

One of the findings of the Study was that some lower quality employment sites could be redeveloped for housing through a more interventionist strategy. However, given the challenges of land assembly, viability and the need to support the existing and potential business base of the area, the Study acknowledged that the experience of the delivery of the current Black Country Core Strategy has shown that the total housing capacity generated from such sites is likely to be limited.

The Study also acknowledged the key barriers to unlocking such challenging sites in terms of landowner / occupier intentions and the lack of viability for re-development that is prevalent across much of the Black Country.

- e. Yes, the Council considers that the approach taken to justify the plan's employment requirement is robust and has been positively prepared through the various evidence base studies and reports (EDNA, BEAR and Black Country Employment Land Supply Technical Paper). In addition, the Black Country Local Authorities will continue duty to co-operate discussions with those local authorities considered to have a functioning economic link with the Black Country FEMA.

Economic Development Needs Assessment (EDNA)

The purpose of the EDNA was to confirm 'current' employment land supply and set out the process by which new sources of supply have been identified for inclusion in the Local Plans.

A number of sites in Sandwell were assessed as part of the EDNA and were either carried forward as SEC1 sites or not considered suitable for allocation as employment development sites.

Assessment and scoring of sites of potential employment use - based on a combination of review of documentation relating to various sites (e.g. with planning permissions, in the Green Belt, etc.) and site visits. Employment land within these locations was examined to ascertain market attractiveness and whether the site may be suitable or not for employment-related development. Review of other local studies including the West Midlands Strategic Rail Freight Interchange study and employment land studies produced by adjacent authorities.

The potential supply of sites in the Black Country also includes estimates of supply generated through windfall sites. Assessment of past completions has informed estimates of anticipated 'windfall' supply generated through intensification/recycling.

In addition to small sites, over the lifetime of the Plan other sites will come forward for employment development through the bringing forward of sites across the borough not currently identified as a development opportunity in the Plan. This will arise from three principal sources - the development of currently vacant land not allocated for employment, the redevelopment of non-employment land and premises (such as commercial leisure and surplus retail units) and the recycling of non-operational land within existing employment areas.

Black Country Employment Area Review (BEAR)

The Black Country Employment Area Review (BEAR) shows that the existing employment areas across the Black Country cover an area of some 3,031 hectares, varying markedly in quality and intensity of use. The supply of employment land in Sandwell (1,193 hectares) is over a third of the total for the Black Country employment land supply and demonstrates the importance of Sandwell's supply to the Black Country Functional Economic Market Area (FEMA) going forward.

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

The NPPF and NPPG require that planning policies should be informed by regular reviews of land allocated for development in development plans and of land availability. Plans should recognise the role of existing occupied employment land and premises in supporting economic growth, and the operational requirements of landowners is recognised as a key consideration in understanding development potential. Land that is needed to support key economic sectors should be retained for employment uses.

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

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

Each of the employment areas identified was reviewed to ensure the boundaries remained appropriate and, where required, amended to reflect changes that have occurred over time. Such changes included the expansion / addition of business units and the erosion of others due to the loss of premises through redevelopment or change of use. New employment areas (3) were identified using a combination of looking at planning permission boundaries for business and industry, aerial photographs and site visits to identify any areas that were in industrial use. A boundary was then captured and mapped.

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

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

In the light of the EDNA Report recommendations, local employment areas should continue to be safeguarded for those uses considered to be suitable for strategic employment areas, but also motor trade activities, including car showrooms and vehicle repair, haulage and transfer depots, trade, wholesale retailing and builders' merchants, scrap metal, timber and construction premises and yards, and waste collection, transfer and recycling uses.

The assessment has shown that a number of existing employment areas are performing poorly and are characterised by high levels of vacancies, constrained access and poor environmental quality; in some cases, all these factors apply.

As set out above, paragraph 121 of the NPPF advises LPAs that land and premises which supports key economic sectors should be safeguarded for such uses. This is supplemented by paragraph 041 of the PPG, which requires that local plans should be informed by assessments of the existing and future supply of land available for economic development and its suitability to meet identified needs. This should include a reappraisal of the suitability of previously allocated land.

The BEAR assessed whether those lowest scoring and poorly performing employment areas could be redeveloped for alternative uses such as housing on the basis that they no longer fulfilled a viable economic role and were unlikely to do so in the future.

The landowner engagement carried out as part of the BEAR showed that while there are areas of under-occupancy, on the majority of these sites this is not an indication that these areas are surplus

to medium- to long-term business needs, and can provide a source of land within which the allowance for recycling outlined above can occur. It is therefore considered that this is a reasonable assumption that can be factored in on future land supply.

Several of the low scoring occupied and operational employment sites (less than 20) were assessed to gauge their suitability as residential allocations going forward in the plan. This demonstrates that all options have been explored in identifying employment land allocations in the Plan. In addition, there are several employment sites under 0.4 hectares that have not been allocated in the plan, which will continue to contribute to the supply of occupied and operational employment land in Sandwell.

The Study has provided a balanced, robust and detailed assessment of the quality of the Black Country's employment areas. It updates the work prepared for the Black Country Core Strategy taking into account the findings and recommendations of the 2017 and 2021 EDNA.

The approach to identifying Strategic Employment Areas ensures that the very best quality employment areas in the Black Country are safeguarded for key manufacturing and logistics activity critical to the recovery and growth of the Black Country Economy. The Study also recommends that large tracts of Local Employment Areas are viable and sustainable locations for a wider range of economic activity and businesses.

The work confirms that a number of employment areas have a limited economic role and are suitable for 'release' to non-employment uses. The quantum of land recommended for release to alternative uses is far less than contained in the current Sandwell Site Allocations and Delivery Development Plan Document (SAD), recognising that many of these areas have a viable and sustainable future as locations for continued employment activity.

Black Country Employment Land Supply Technical Paper

The Employment Land Supply Paper (November 2024) [ECON006A] provides a position statement on Black Country Employment Land supply (2020- 2041 and 2020-2042). The paper uses a robust logical step by step approach to show how the local authorities have examined existing and forecast future land availability to meet identified needs.

Duty to Cooperate

The Council through the Black Country FEMA has engaged constructively, actively and will continue to have ongoing discussions with those adjacent local authorities that have a strong functional economic link with the FEMA.

Q2.9 In terms of this issue, are any main modifications necessary for soundness?

While the Council is satisfied that it has submitted a sound plan, should the Inspector be minded to recommend any further modifications without which she would consider the SLP to be unsound, the Council would be pleased to receive them.