

Black Country Employment Land supply technical paper

2024 Update

November 2024

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1. Introduction and scope

- 1.1 This paper forms part of the evidence base to support the preparation of the individual Local Plans produced by the Black Country Local authorities (BCLAs). This is a second update of a Report first produced in 2021 to support the Regulation 18 Black Country Plan (BCP). 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 Wolverhampton 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.
- 1.2 The overall purpose of the Paper is to provide a definitive position statement on employment land supply to meet future needs. The approach is consistent with the guidance on Housing and Economic Land availability assessments set out in Government Planning Practise Guidance (July 2019)(<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>).
- 1.3 For the purposes of this paper, employment land consists of land for factories, warehouses, logistics and other uses that need to locate in industrial areas (trade wholesale, depots, big garages, waste management). It does not include shops, offices (except where ancillary to B2/B8 uses), and leisure uses, as, while they employ people, they are directed into town and local centres. They are therefore considered a town centre issue.
- 1.4 The context for this paper is the Black Country Economic Development and Needs Assessment (EDNA) prepared by WECD consultants in 2017 with a further updates in 2021 , 2022, 2023 and 2024. The 2023 EDNA identified a range of economic growth scenarios for consideration in the preparation of Local Plans. The forecasts identify a requirement to provide for a net increase of 571.6ha of employment land to meet forecast demand across the Black Country for the period 2020-41, and 598.9ha to 2042. The annual requirement being 27.2 ha. This requirement is broken down by individual BCLA as follows and includes an allowance for land completed in South Staffordshire which directly addressed needs arising in the Black Country through relocations of Black Country businesses. The total requirement is set out below. The Wolverhampton Regulation 19 Local Plan employment land requirement does not include the South Staffordshire allowance and this is aggregated into the Black Country requirement, but it is included in the text below.
- Dudley – 90.5ha to 2041 and 94.9 to 2042
 - Sandwell – 203.5ha to 2041 and 213.3ha to 2042

- Walsall – 141.8ha to 2041 and 148.5ha to 2042
- Wolverhampton 135.9ha to 2041 and 142.3ha to 2042

1.5 The EDNA (2023) also recommends that Local Plans should factor in existing occupied employment land that is proposed to be 'lost' to other uses over the Plan period.

1.6 The Regulation 18 Black Country Plan, as updated through subsequent Local Plan work proposed some 109ha of land within existing employment area be redeveloped for housing, mainly poor-quality constrained sites where redevelopment would benefit the wider area and enable businesses to relocate to more modern accommodation. Due to relatively high vacancy levels in many of these areas, only 63ha of land is required to be provided to directly compensate for this loss (however, as noted within the EDNA (2023) this is a conservative approach as it is generally assumed that some 15% of housing supply on allocations involving the redevelopment of employment land will not be built out). This means that the total net employment land requirement for the Black Country is 634.6ha to 2041 and 661.9ha to 2042 ha from a base date of April 2020. The impact of the need to provide for replacement land is summarised below:

- Dudley – 26ha replacement = total need of 116.5ha to 2041 and 120.9ha to 2042
- Sandwell – 26ha replacement = total need of 229.5ha to 2041 and 239.3ha to 2042
- Walsall – 0ha replacement = total need of 141.8ha to 2041 and 148.5ha to 2042
- Wolverhampton – 11ha replacement = total need of 146.9ha to 2041 and 153.3ha to 2042

1.7 The 2024 EDNA identifies a gap of 257.2ha to 2041 and 280.4ha to 2042 between forecast demand and supply within the Black Country. The purpose of this paper is 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.

1.8 This paper shows the situation as at 1 April 2024, and the period for demand and forecast supply is 2020-41 for the Dudley and Sandwell Local Plans, and 2020-42 for the Wolverhampton Local Plan. The paper is made up of five subsequent Chapters:

- Chapter two summarises the approach used to determine the ‘baseline’ supply.
- Chapter three summarises the approach used to identify new sources of land supply within the Black Country urban area.
- Chapter four summarises the role of land currently available in neighbouring local authorities to meet Black Country needs.
- Chapter five sets out the approach used to identify opportunities within the Black Country Green Belt
- Chapter six provides a summary of the work.

2.0 Baseline supply

2.1 The 'baseline' supply is the quantum of land available for development in April 2024 that can be carried forward into the Local Plans produced by the four BCLAs to meet future demand. It is made of up of four sources:

- Completions 2020-24
- Existing Local Plan allocations which do not have planning permission
- Sites of over 0.4ha with planning permission (both local plan allocations and unallocated sites).
- Small sites of less than 0.4ha not allocated in a local plan.

2.2 Each of these sources is discussed in turn below.

2.3 Completions 2020-24

2.4 Over the four year period 2020/21-2023/24 a total of 152.2ha of land was built out for employment uses in the BCLAs, equating to 38.1ha per annum. Of this, 79.1ha (52%) was net additional land – land that was not previously used for employment activity and so represents a growth in the total employment land stock. The annual delivery of net additional land was 19.8ha. The scale of completions across the four BCLAs is set out in Table 1 below.

Table 1 – completions 2020-24

Local authority	Gross completions (number)	Gross completions (ha)	Net completions (number)	Net completions (ha)
Dudley	36	25.1	21	17.1
Sandwell	45	51.7	19	11.8
Walsall	18	47.72	17	27.7
Wolverhampton	18	28.2	15	22.6
Total	117	152.7	72	79.13

2.5 The schedules in Appendix 1 detail the nature of the completions. This is discussed in more detail in Section 2.16 of this Report in order to forecast anticipated levels of 'windfall' development – development on sites not allocated for development which can make an important contribution to overall employment land supply.

2.6 Completions 2020-24 reduces the overall remaining demand requirement to 555.5ha to 2041 and 582.8ha to 2042.

2.7 Local Plan allocations

2.7 Since the completion of the EDNA in 2017, the local authorities have reviewed all existing Local Plan employment allocations for their inclusion in the Black Country Plan and moving forward the individual Local Plans. The size threshold for Local Plan allocations is 0.4ha and it is intended that this same threshold will be used in the individual BCLA Local Plans in most cases. This review has been guided by the review of the quality of sites and whether they meet the needs of the market completed as part of the 2017 EDNA itself, and subsequent engagement with landowners and developers on their likely availability and deliverability. The details of this review are set out in Appendix 2 and summarised below in Table 2:

Table 2 – review of existing qualifying Local Plan allocations

Local authority	Allocations to be carried forward (number)	Allocations to be carried forward (ha)
Dudley	7	6.9
Sandwell	1	5.3
Walsall	39	93.5
Wolverhampton	15	26.6
Total	62	132.4

2.8 This stage of the assessment found that the vast majority of existing Local Plan allocations remain suitable and available for development and should be included in the Local Plans. A significant number having planning permission. This 2023 update also reflects the building out of a number of sites and a change to their planning status.

2.9 Of those allocations not carried forward, a number are subject to planning permissions for alternative uses or where current evidence suggests that there is no certainty of delivery over the Plan period.

2.10 In total, the existing Local Plan allocations which are considered to be suitable and available to meet future needs are capable of providing 132ha on 62 sites.

2.11 Large Sites with Planning permission

2.12 There are a number of large sites across the Black Country which benefit / have benefitted from planning permission but are not allocated as development opportunities in the Local Plan. These sites are often referred to as 'windfalls' and the threshold for potential inclusion in the Plan is 0.4ha in most cases to retain consistency with the existing suite of Local Plans. This category of sites is made up of two sources:

- Sites with a 'live' planning permission for employment development

- Sites with historic 'lapsed' planning permissions granted since 2005 which are suitable and available for employment development.

2.13 As with the current Local Plan sites, the sites were reviewed in terms of their suitability and deliverability. In those cases where the planning permission had 'lapsed', the sites were included in the Black Country Plan Site Assessment Report and subsequent Local Plan work. The findings of the assessment are summarised in Table 3 below with the detailed schedule of sites contained in Appendix 3.

Table 3 – review of large sites with lapsed / live planning permission

Local authority	Sites with live/lapsed planning permission (number) contributing to supply	Sites with live/lapsed planning permission (ha) contributing to supply	Sites with live / lapsed planning permission (ha) to be allocated
Dudley	0	0	0
Sandwell	0	0	0
Walsall	0	0	0
Wolverhampton	6	3.6	2.7
Total	6	3.6	2.7

2.14 This source of land can provide 6.3ha towards the employment land target on six sites, all located within Wolverhampton. Of these sites, one is due to commence imminently and located within an existing employment area where the planning permission and Local Plan designation support the principle of development. The other site involves the redevelopment of an existing operational leisure unit located within a retail park. Due to uncertainties over the delivery timescales for this proposal, it is not recommended to be allocated as a development site in the Local Plan.

2.15 Small sites

2.16 Sites of less than 0.4ha provide a relatively small but constant source 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. In April 2024, small sites with planning permission have the potential to provide for 2.6ha of net additional land for employment development.

2.17 For the four-year period 2016/17 to 2019/20, only 1.8ha of land on small sites had been completed, equating to 0.4ha per annum. For the period 2020-24, small sites completions provided 2.96ha of net additional employment land (0.74ha per annum), slightly in excess of the 2016-20 equivalent. For the period 2024-41, the low small sites scenario (0.4ha pa), if projected forward, provide some 7.2ha of net additional land. The higher growth scenario

based on 2020-24 completions would provide 13.3ha. For the period to 2042, the equivalent contributions are 7.6ha and 14.1ha. It is considered that a cautious approach is more appropriate given the uncertainty over the delivery of this source of supply.

2.18 In summary, small sites windfalls are therefore projected to provide 6.8ha to 2041 and 7.2ha to 2042.

2.19 Large windfall sites recycling and intensification

2.20 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. 40% of this net additional land was in Dudley, 56% in Sandwell and 4% in Walsall. The completions data for 2020-24 set out in Appendix 1 indicates an even higher equivalent figure over recent years of 22.1ha, equivalent to 5.5ha per annum and making up 28% of all completions involving net additional employment land over that period.

2.21 The 2016-20 rate of development equates to circa 3.7ha per annum, or 62.9ha to 2041 and 66.6ha to 2042 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 Black Country Employment Area Review (BEAR) shows that the existing employment areas across the Black Country cover an area of some 3,031ha, varying markedly in quality and intensity of use. 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 which can be factored in on future land supply.

3.0 New urban sources of supply

- 3.1 Completions 2020-24, existing Local Plan allocations, existing sites with planning permission, future anticipated small sites and larger windfall sites will provide an important source of land to meet future needs in the order of 292ha to 2041 and 296ha to 2042. However, this will not be sufficient to meet the level of demand identified in the EDNA.
- 3.2 For this reason, the Black Country local authorities have sought to identify additional sources of supply across the administrative area, in the first instance excluding land within the Green Belt. This sequential approach is consistent with the requirements to para 137 of the NPPF. The main sources of non-green belt land in the Black Country are:
- Submissions made by landowners and developers through the Black Country Plan Call for Sites Exercise.
 - Sites identified through the Black Country Employment Area Review (BEAR).
 - Sites identified for employment development in previous Local Plans or put forward for consideration for development as part of the preparation of these Plans
 - Other sites identified through the Black Country Plan and subsequent Local Plan evidence gathering.
- 3.3 The sites considered through this work are listed in Appendix 4. All of the sites in this category have been assessed for their suitability and availability for employment development, tested for their market attractiveness through the second stage of the EDNA and through engagement with landowners and occupiers. Since the preparation of the 2021 Report, some of these sites have been built out, and the BCLAs have continued to review additional opportunities not considered through the BCP process.
- 3.4 The findings of this work are set out below in Table 4 and listed in Appendix 4.

Table 4 – review of potential additional sources of urban supply

Local authority	Other sources of supply to be allocated (number)	Other sources of supply to be allocated (ha)
Dudley	4	4.0
Sandwell	10	26.9
Walsall	0	0.0
Wolverhampton	2	9.3
Total	16	40.1

- 3.5 In total, 12 sites were identified through this stage of the work, providing some 40.1ha of land to 2041 and 2042.

4.0 **Consented land and other sources of supply outside the Black Country**

- 4.1 Following completion of the stages outlined in the previous sections, there remains a significant shortfall against the employment land requirement. Para 137 of the NPPF requires that before considering changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined all other reasonable options for meeting its identified need for development. This should be informed by discussions with neighbouring local authorities about whether they could accommodate some of the identified need for development. In the first instance, this work involved understanding the extent of any consented developments or Local Plan allocations within those neighbouring areas with strong physical or functional links to the Black Country meeting wider than local needs that could potentially meet needs arising in the Black Country. It also includes contributions from emerging Local Plans which have been agreed via Statements of Common Ground.
- 4.2 On 4th May 2020 consent was granted for the West Midlands Interchange (WMI) at Four Ashes in South Staffordshire. WMI is a Strategic Rail Freight Interchange with warehousing and other associated development on land at junction 12 of the M6 to the north of Wolverhampton. The site is 270ha in size and anticipated to create 8,550 direct jobs. Within this 270ha is a high-proportion of non-developable land set aside for the Rail Freight Interchange itself and proposed country parks, reducing the developable area to some 193ha. The Black Country EDNA recognised that a proportion of the site would potentially contribute to meeting the B8 needs arising in the Black Country and additional technical work was commissioned determine an appropriate apportionment. The starting point for this apportionment is the 193ha figure.
- 4.3 This work, completed by Stantec consultants recommended that some 67ha of land provided at the site could be apportioned to meeting needs arising in the Black Country. This figure was agreed in a Statement of Common Ground between South Staffordshire Council, Dudley Council and Wolverhampton Council, and other local authorities with a functional economic relationship to South Staffordshire in early 2023, updated in August 2024.
- 4.4 This 67ha is very much a minimum figure. In July 2024 the BCAs contacted all of the local authorities within the defined WMI market area to determine whether they wished to 'claim' the quantum of land apportioned to them in the Stantec Report. The responses to this work are set out in Appendix 5. The engagement has shown that there are existing 'claims' to date from the BCAs (67ha), South Staffordshire (18.8ha), Cannock Chase (10ha) and Birmingham (53ha). 148.8ha in total. Of the balance of 44.2ha, a number of authorities have indicated that they may wish to claim their allocation but further work is required to confirm this (Lichfield, Bromsgrove and Redditch)(17ha) and some have confirmed that needs are being met in full and they have no claim (Wyre Forest, Newcastle under Lyme, East Staffordshire, Stafford, Staffordshire Moorlands (20ha). Other authorities have not

responded (Stoke on Trent and Solihull)(20ha), but it is anticipated that their position on the WMI apportionment will be confirmed through Local Plan work. In summary, there is at least a further 20ha of consented land at WMI which is 'surplus' to the needs of the areas to which it is apportioned which may be available to meet needs arising in the Black Country. This in addition to the 67ha already secured. This figure will be confirmed as the respective Local Plans progress.

- 4.4 At this stage, it is assumed that consented developments in neighbouring areas can provide a minimum of 67ha of land to meet Black Country employment land needs, potentially a further 20ha subject to ongoing Duty to Cooperate engagement. This being limited to the West Midlands Interchange.
- 4.5 In 2024, South Staffordshire Council commissioned an update of the 2018 EDNA and this work identified a surplus of 45.2ha of strategic employment land that could be available to meet cross boundary needs. The Statement of Common Ground referred to in relation to the West Midlands interchange confirms that this land can be attributed to meeting needs arising in the Black Country. This means that a total of 112.2ha of land in South Staffordshire is available to meet Black Country needs (taking into account the 67ha at the West Midlands interchange).
- 4.6. The Shropshire Local Plan is currently at Examination. The submitted version of this Plan includes provision for 30ha of employment land over and above local needs specifically to meet needs arising in the Black Country. This contribution is confirmed in a Statement of Common Ground between Shropshire Council and the BCLAs.
- 4.7 These contributions from South Staffordshire and Shropshire provide 142.2ha of land to meet needs arising in the Black Country.

5. Land within the Black Country Green Belt

- 5.1 As part of the BC Plan, work was undertaken with regards to considering additional employment I sites within the Black Country Green Belt.
- 5.2 Appendix 5 details the sites that were proposed for inclusion in the Regulation 18 BC Plan, all within Walsall. All of the sites in this category have been assessed for their suitability and availability for employment development, tested for their market attractiveness through the second stage of the EDNA and through engagement with landowners and occupiers. No further sites have been considered and identified following the cessation of the BCP through individual Local Plan preparation. This Green Belt land supply will need to be considered through the Walsall Local Plan process.
- 5.3 The findings of this work are set out below in Table 5.

Table 5 – review of Green Belt sites (BCP Regulation 18 work)

Local authority	Sites to be allocated (number)	Sites to be allocated (ha)
Dudley	0	0.0
Sandwell	0	0.0
Walsall	5	47.3
Wolverhampton	0	0
Total	5	47.3

- 5.4 In total, five sites were identified through this stage of the work, providing some 47.3ha of land.

6. Summary

- 6.1 This paper provides a position statement on Black Country Employment Land supply (2020-2041 and 2020-2042). The paper uses a logical step by step approach to show how the local authorities have examined existing and forecast future land availability to meet identified needs. The key findings are summarised in Table 5 below and broken down by BCLA in Appendix 6.

Table 5 – summary of findings – 2041 / 2042

Source of supply	Total (ha)	Total (cumulative)(ha)	Balance against 2041 / 2042 requirement
Completions 2020-24 providing net additional employment land	79.1	79.1	-555.5 / -582.8
Local Plan allocations carried fwd.	132.4	211.5	
Large sites (over 0.4ha) with planning permission	6.3	217.8	
Small sites (less than 0.4ha) with planning permission.	2.6	220.4	
Large sites windfalls	62.9 / 66.6	283.2 / 287	
Small sites windfalls	6.8 / 7.2	290.0 / 294.2	
Other sources of supply (non GB)	40.1	330.1 / 334.3	
Black Country Green Belt	47.3	377.4 / 381.6	
Black Country Employment Land Supply		377.4 / 381.6	-257.2 / -280.3
South Staffordshire Regulation 19 Local Plan contribution as confirmed in SoCG (including WMI).	112.2		
Shropshire Regulation 19 Local Plan contribution as confirmed in SoCG	30.0		
Total land supply to contribute towards Black Country Needs		519.6 / 523.8	-115 / -138.1

6.2 In total, 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 280.4ha. After taking into account the contribution from neighbouring areas of 142.2ha as summarised in section 4, the total quantum of land available to meet needs arising in the Black Country is 519.6ha to 2041 and 523.7ha to 2042. This reduces the Black Country employment land shortfall to 115 ha to 2041 and 138.1 ha to 2042.

Appendix 1 – Completions 2020-24 (net additional only)

Dudley

Site name	Area (ha)	Source including current Local Plan (LP) and BCP designation	Development type	Year of completion	Planning ref
Land off First Avenue/Dandy Bank Road, Pensnett Trading Estate (Dandy Bank phases 2 and 3)	1.3	LP - E10.1 (High Quality Employment Area BCP - allocation (DUE123)	Change of use of non-employment premises	2020/21	P19/0660
Land off First Avenue/Dandy Bank Road, Pensnett Trading Estate, (Dandy Bank phases 2 and 3)	1.07	LP E10.1 ((High Quality Employment Area) BCP allocation (DUE123)	Development of non-operational land within an employment area.	2020/21	P19/0117
163, BANK STREET, BRIERLEY HILL,	0.07	Small sites windfall	Change of use of non-employment premises	2020/21	P20/0118
UNIT 27, THORNLEIGH TRADING ESTATE,	0.03	Small sites windfall	Change of use of non-employment premises	2020/21	P19/1650
Conyers Trading Estate, Unit 2,	0.53	Small sites windfall	Development of non-operational land within an employment area.	2020/21	P20/1487
VACANT LAND ADJACENT BLOCK 17B, NARROWBOAT WAY,	0.67	LP - ES11A.7 (Employment Opportunity Site) BCP allocation (DUE137)	New build on vacant land	2021/22	P20/1774
LAND OFF, DREADNOUGHT ROAD, PENSNETT	1.1	LP - E10.1 (High Quality Employment Area) BCP allocation (DUE123)	New build on vacant land	2021/22	P20/1371

Site name	Area (ha)	Source including current Local Plan (LP) and BCP designation	Development type	Year of completion	Planning ref
LAND OFF, CAKEMORE ROAD, ROWLEY REGIS,	1.16	LP - H13.1 (Mixed Use Redevelopment Area) BCP allocation (DUE198)	New build on vacant land	2021/22	P20/0348
Corner of Bromley St and Vicarage Rd, Lye	0.03	Small sites windfall	Development of non-operational land within an employment area.	2021/22	P15/1930
HARRIS WALTON TWO WOODS LANE QUARRY BANK	0.01	Small sites windfall	Development of non-operational land within an employment area.	2021/22	P17/1055
Ye Olde Saltbrook PH, 73 Hayes Lane, Lye	0.04	Small sites windfall	New build on vacant land	2021/22	P16/1321
Grazebrook Industrial Park, Peartree Lane, Dudley (Hulbert Drive site)	1.32	LP – ES11A.3 BCP allocation (DUE 132)	New build on vacant land	2022/23	P20/1527
GRAZEBROOK INDUSTRIAL PARK, PEARTREE LANE,	1.31	LP – ES11A.3 BCP allocation (DUE 132)	New build on vacant land	2022/23	P20/1565
GRAZEBROOK INDUSTRIAL PARK, PEARTREE LANE,	0.58	LP – E11A.1 BCP allocation (DUE322)	New build on vacant land	2022/23	P20/1528
BLOCK 5B, NAVIGATION DRIVE, HURST BUSINESS PARK,	0.31	Large windfall	Development of non-operational land within an employment area.	2022/23	P21/0980
GIBBONS INDUSTRIAL PARK, PENSNETT,	1.42	LP – E10.1 BCP allocation (DUE326)	New build on vacant land	2022/23	P21/0866

Site name	Area (ha)	Source including current Local Plan (LP) and BCP designation	Development type	Year of completion	Planning ref
HULBERT INDUSTRIAL ESTATE, CINDER BANK,	5.1	Large windfall	Development of non-operational land within an employment area.	2022/23	P20/1691
UNIT 9 TO UNIT 14, BEVAN ROAD,	0.09	Small sites windfall	Development of non-operational land within an employment area.	2023/24	P21/0092
Building G1, Prime Point, First Avenue, Kingswinford, Pensnett	0.24	Small sites windfall	Development of non-operational land within an employment area.	2023/24	P21/2171
VACANT LAND ADJACENT BLOCK 17B, NARROWBOAT WAY,	0.01	Small sites windfall	Development of non-operational land within an employment area.	2023/24	P21/0628
Unit 10, VERNON ROAD, HALESOWEN,	0.68	Large windfall	Development of non-operational land within an employment area.	2023/24	P22/1040

Sandwell

Site name	Area (ha)	Source including Black Country Plan status	Development type	Year of completion	Planning ref
Portway Road Wednesbury	0.49	Small sites windfall	New build on vacant land	2020/21	DC/14/57758
J And J Siddons Limited Siddons Factory Estate	0.60	Large windfall	New build on vacant land	2020/21	DC/19/63195
Unit 8-10, Cleton Street Business Park	2.70	Large windfall	New build on vacant land	2020/21	DC/20/64154
Seven Stars Road Oldbury	2.57	Large windfall	New build on vacant land	2020/21	DC/18/62516

Unit 1 Parkrose Industrial Estate	1.50	Large windfall	New build on vacant land	2020/21	DC/19/63364
Rowelec Limited, Churchbridge, Oldbury	0.07	Small sites windfall	New build on vacant land	2021/22	DC/20/63858
Unit 5, Portersfield Road, Cradley Heath	0.38	Small sites windfall	New build on vacant land	2021/22	DC/19/63677
Land at Tasker Street Business Park,	0.74	Large windfall	New build on vacant land	2021/22	DC/20/64561
1 - 7 Crystal Drive Smethwick B66 1QG	0.90	Large windfall	New build on vacant land	2021/22	DC/20/64112
101 Dudley Road East, Tividale, Oldbury	0.02	Small sites windfall	New build on vacant land	2021/22	DC/22/66583
Land Between Unit 8 And Unit 9, Oak Street Industrial Park	0.01	Small sites windfall	New build on vacant land	2022/23	DC/20/64353
Bishopgate Works 68 Lower City Road	0.45	Large windfall	New build on vacant land	2022/23	DC/22/66878
Land To The Rear Of 1-5 Halesowen Street, Rowley Regis	0.07	Small sites windfall	New build on vacant land	2023/24	DC/16/60104
Land At Brandon Way, West Bromwich	1.53	LP (residential) BCP allocation	New build on vacant land	2023/24	DC/22/66482

Walsall

Site name	Area (ha)	Source including Black Country Plan status	Development type	Year of completion	Planning ref
Tempus 10 South (Land South of Village Hotel, Tempus Drive)	0.64	SAD and BCP allocation (WAE064)	New build on vacant land	2021/22	18/0832
Reedwood Way	4.02	SAD and BCP allocation (WAE058)	New build on vacant land	2020/21	

Woods Bank Trading Estate, Moxley	0.30	SAD allocation	New build on vacant land	2021/22	
Maybrook Industrial Estate, Maybrook Road, Walsall Wood	0.67	SAD allocation (site IN0005.6)	New build on vacant land	2021/22	
Maybrook Road (Units 1 to 4)	0.25	SAD allocation (site IN0005.2)	New build on vacant land	2021/22	
LAND BETWEEN ST.ANNES ROAD,MONMER LANE AND SHARESACRE STREET,WILLENHALL	2.02	SAD and BCP allocation (WAE068)	New build on vacant land	2021/22	17/1527
Focus 10 (adjacent former Trident Alloys, Willenhall Lane, Bloxwich	5.92	SAD and BCP allocation (WAE017)	New build on vacant land	2020/21	18/1559
Aspray (Former George Carter Pressings), Park Road, Willenhall	1.25	SAD and BCP allocation (WAE070)	New build on vacant land	2021/22	20/0388
Box Pool site	1.67	SAD and BCP allocation (WAE109)	New build on vacant land	2021/22	17/0843
Former Ductile, Charles Street, Willenhall	2.59	SAD and BCP allocation (WAE069)	New build on vacant land	2022-23	19/1366 and 21/1051
South of Watery Lane, Willenhall	1.46	Large windfall	New build on vacant land	2023-24	18/1187
Heath Road / Kendricks Road, Darlaston	0.55	SAD and BCP allocation (WAE099)	Development of non-operational land within an employment area.	2022-23	20/1554
Rear of Globe Pub, Darlaston Road, Walsall	2.89	SAD and BCP allocation (WAE105)	New build on vacant land	2022-23	20/0254
Adjacent Shaylors, Anchor Industrial Park,	0.95	SAD and BCP allocation (WAE010)	New build on vacant land	2022-23	19/1543

Wharf Approach, Aldridge					
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Wolverhampton

Site name	Area (ha)	Source including Black Country Plan status	Development type	Year of completion	Planning ref
Oxygen Freejumping, Well Lane	0.9	Large windfall	Change of use of non-employment premises	2020/21	19/01008/FUL
Units 1-3 Racecourse Road Industrial Estate	0.5	Small sites windfall	Change of use of non-employment premises	2020/21	18/01404/FUL
Pantheon Park Main site	5.3	BCP allocation (WOE731)	New build on vacant land	2020/21	18/01044/FUL, 19/00132/RC
Bassi House Moore Street South	0.1	Small sites windfall	Development of non- operational land within an employment area.	2020/21	19/01352/FUL
Planetary Industrial Estate	0.82	Large windfall	Development of non- operational employment land	2020/21	20/00223/FUL
Shaw Road	0.14	BCP allocation (WOE690)	Development of non- operational land within an employment area.	2021/22	20/01145/FUL
Bowmans Harbour	1.23	BCP allocation (WOE732)	New build on vacant land	2021/22	20/01578/FUL
Unit 1, Pantheon Park	0.6	BCP allocation (WOE731)	New build on vacant land	2021/22	19/01319/FUL
34 Mount Pleasant	0.36	Small sites windfall	New build on vacant land	2021/22	20/00791/FUL
Bentley Bridge Business Park	1.24	BCP allocation (WOE729)	New build on vacant land	2022/23	18/01362/FUL
Rolls Royce Playing Field, Spring Road	1.76	BCP allocation (WOE755)	New build on vacant land	2023/24	21/01377/FUL

Gas Holder site, Wolverhampton Science Park	2.58	BCP allocation (WOE723)	New build on vacant land	2023/24	21/01698/FUL
Phoenix Road	1.77	BCP allocation (WOE7698)	New build on vacant land	2023/24	21/01643/FUL
Tata Steel, Wednesfield (Revolution Park)	4.26	BCP allocation (WOE618)	New build on vacant land	2023/24	22/00281/FUL
Buzz Bingo Bushbury Lane	1.01	Large windfall	Change of use of non- employment premises	2023/24	20/01580/FUL and 22/00651/FUL

Appendix 2 – Review of Local Plan allocations

Dudley

Site Name	Current Site Ref (Existing Local Plan, BCP and new Local Plan (DLP))	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Steelpark Road, Halesowen	DBDS ES14.3/ 187 BCP - DUE187 DLPE06	0.4	Vacant	No change in circumstances.	Retain Employment Allocation	Very Good (2017 EDNA)	No known significant constraints. Site is land-locked by existing business park so no feasible alternative use.
Westminster Industrial Estate Cradley Road, Netherton	DBDS - NETH.ES9 / 147 BCP - DUE147 DLPE08	0.4	Vacant	No change in circumstances.	Retain Employment Allocation	Good (2017 EDNA)	Lapsed planning permission granted in 2005 for 8 no. small industrial units – P05/0014. – lapsed. Current market interest in site delivery.
Timmis Road, Lye	DBDS - ES13.3/ 175 Not a BCP allocation DLPE12	0.6	Vacant	Yes. Planning permission granted for light industrial development	Retain employment allocation	Good (2017 EDNA)	Site has planning permission for employment development granted 2022 (P22/0530). New allocation.
Hillcrest Business Park, New Road, Netherton	DBDS - ES11A.5 / 135 DUE135	0.4	Vacant	No change in circumstances.	Retain Employment Allocation	Very Good (2017 EDNA)	DY5 EZ Site and within Blackbrook Valley LDO with associated landowner engagement. Site has existing industry on three sides, so no alternative land uses are feasible

Site Name	Current Site Ref (Existing Local Plan, BCP and new Local Plan (DLP))	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Narrowboat Way, Blackbrook Valley	DBDS - ES11A.4 / 136 BCP - DUE136 DLPE04	1.4	Vacant	No change in circumstances.	Retain Employment Allocation	Good (2017 EDNA)	DY5 EZ Site and within Blackbrook Valley LDO. Site is land-locked by existing business park so no feasible alternative use. Current market interest in site delivery.
Tansey Green Road, Pensnett	DBDS E10.1 / 123 BCP – DUE327 DLPE03	1.7	Vacant	No change in circumstances.	Retain Employment Allocation	Premium (2017 EDNA)	DY5 EZ Site - Low development density due to topography of site. Site is surrounded on 3 sides by existing and approved industrial uses – so is not feasible to be redeveloped for an alternative use. Landowner has confirmed the site is available for development.
Fountain Lane, Coseley	DBDS - E16.2 / 104 BCP - DUE323 DLPE01	1.9	Vacant / Underutilised land around existing unit	No change in circumstances.	Retain Employment Allocation	Good (2017 EDNA)	No known significant constraints Permission granted in 1995 for industrial development – 95/50290 Site is between existing business park so no feasible alternative use. Landowner has confirmed the site is available for development.

Sandwell

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Site off Richmond Street, West Bromwich	SAD E8.1	1.1	Vacant	No change in circumstances.	Remove employment allocation as development opportunity.	Not assessed	Ground conditions and access constrain development of the site and no certainty at this stage of deliverability.
Bilport Lane, Wednesbury	SAD E8.7 SAE256	5.3	Vacant, used for caravan storage	Planning permission granted for employment development.	Retain employment allocation.	Site assessment not required due to evidence of market interest.	Access problems to the site due to low bridge height have stopped the site coming forward for development. A number of planning permissions have been granted since the allocation of the site in the SAD document. DC/16/59279 - Proposed construction of a standing reserve power plant comprising 14 No. gas reciprocating engine generators with an office and storage building, security and acoustic fencing, other ancillary structures and associated works. DC/14/57687 - Proposed importation and storage of road plannings for crushing and screening prior to use in aggregate and asphalt production on the adjoining asphalt plant site.

Walsall

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Pelsall Road/ Bullows Road, Brownhills	SAD IN2.1 IN0002.1 WAE002	1.51	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Greenfield site faces existing industry on two sides. Owned by subsidiary of Tesco (T&S stores) whose main distribution centre is opposite
North of Maybrook/ Clayhanger Road, Brownhills	SAD IN5.4 IN0005.1 WAE005	0.76	Vacant	Planning permission granted for employment development.	Retain employment allocation.	Very Good (2017 EDNA)	Owned by adjacent landowner who is continuing to expand
Former Scrapyard, North of Joberns Tip, Coppice Lane, Walsall Wood	SAD IN9.12 IN0009.12 WAE004	1.91	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Landowner contacted through SAD in 2016 and no change in circumstances.
Longleat Road, Walsall Wood (South of Focus Car Park)	SAD IN9.13 IN0009.13 WAE007	0.19	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Landowner contacted through SAD in 2016 and no change in circumstances.
LAND CORNER OF NORTHGATE/ LONGLEAT ROAD, ALDRIDGE	SAD IN9.14 IN0009.14 WAE009	0.62	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Landowner contacted through SAD in 2016 and no change in circumstances.
Former Aldridge Rail Sidings, Middlemore Lane, Aldridge	SAD IN12.5 IN0012.5 WAE012	2.16	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Owned by Walsall Council. Adjacent to potential Aldridge Railway Station.

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Former Jack Allen Site, South of Middlemore Lane, Aldridge	SAD IN12.6 IN0012.6 WAE014	1.87	Vacant	Planning permission granted for employment development.	Retain employment allocation.	Very Good (2017 EDNA)	Planning permission for B1(a) and B2 granted 17/7/20 (reference 18/1702)
McKechnie Brass, Middlemore Lane, Aldridge	SAD IN12.8 IN0012.8 WAE021	6.34	Vacant	Planning permission granted for employment development.	Retain employment allocation.	Poor (2017 EDNA)	Planning permission for HWRC under construction.
Fryers Road, Bloxwich	SAD IN17.2 IN0017.2 WAE024	3.82	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Energy recovery facility under construction (15/1157).
Rear of Biasi House, Opposite Mary Elliot School, Leamore Lane	SAD IN18.2 IN0018.2 WAE018	0.55	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Site is surrounded by existing industry and part in use for parking by adjacent occupier.
Former Calor Gas Site fronting Green Lane, Walsall	SAD IN27.1 IN0027.1 WAE027	1.01	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Site is partly in use for open storage in conjunction with adjacent warehouses (all owned by Lidl)
North of Newfield Close, Walsall	SAD IN27.2 IN0027.2 WAE041	2.19	Vacant	Planning permission granted for employment development.	Retain employment allocation.	Very Good (2017 EDNA)	Planning permission for B8 in 2018 (17/1489).
Former Scrap Yard, Alma Street, Walsall	SAD IND32.2 IN0032.2 WAE032	0.51	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Existing industry on three sides and land is owned by adjacent scrapyard

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Walsall Enterprise Park West, Regal Drive, Pleck	SAD IN52.2 IN0052.2 WAE052	0.79	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Site is needed to allow expansion of adjacent high quality industrial estate
Adj to Middletons, Bescot Crescent	SAD IN56.2 IN0056.2 WAE056	0.43	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Acquired by adjacent owner (Middletons) in 2016. Possible expansion land.
Tempus 10 North (Land East of KFC, Tempus Drive)	SAD IN63 IN0063 WAE063	1.76	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Site on the market.
Tempus 10 South (Land South of Village Hotel, Tempus Drive)	SAD IN64 IN0064 WAE064	1.01	Vacant	Planning permission granted for employment development and under construction.	Retain employment allocation.	Very Good (2017 EDNA)	Planning permission for B8 granted 2018 (18/0832). Under construction.
Land between St Annes Rd, Monmer Lane and Sharesacre St, Willenhall	SAD IN68.1 IN0068.1 WAE068	2.57	Part vacant	Planning permission granted for employment development and under construction.	Retain employment allocation.	Good (2017 EDNA)	Site is now in use for Storage, Repair and Manufacture of Mobile and Static Accommodation
Adjacent Rainbow Business Park, Stringes Lane, Willenhall	SAD IN69.3 IN0069.3 WAE065	0.45	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Lapsed 2015 planning permission for vehicle workshop
Land rear of Guardian Lock and 47 Wednesfield Road, Willenhall	SAD IN70.4 IN0070.4 WAE076	0.39	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Small landlocked site is surrounded by existing industry.

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Rear of Assa Abloy, School Street, Willenhall	SAD IN72.2 IN0072.2 WAE072	2.24	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	The only access is through the adjacent factory site, and Assa Abloy have expanded onto part of the land as part of their refurbishment proposals
Rear of 18 Rose Hill, Willenhall	SAD IN78.4 / IN78.12 IN0078.12 WAE076	0.3	Vacant	No change in circumstances.	Retain employment allocation.	Not Assessed (2017 EDNA)	Below EDNA size threshold but forms part of adjacent high quality industrial estate which is mainly in same ownership (LCP Estates). Northern part is in separate ownership (Patrick Nigel Curran)
North of Westacre, Willenhall	SAD IN78.2 IN0078.2 WAE078	0.64	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Site is landlocked to rear of high quality industrial estate so no feasible alternative use
Central Point, Willenhall Road, Darlaston	SAD IN84 IN0084 WAE084	1.67	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Site is next to BCR and is surrounded by existing industry. Planning permission granted in 2015 for HGV parking in connection with adjacent Yodel site
Access 10 Business Park, Land adjacent Unit 401, Bentley Road South	SAD IN93.2 IN0093.2 WAE093	1.03	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Current planning application for open storage in conjunction with new occupier of adjacent site.
Cemetery Road, James Bridge, Darlaston	SAD IN98.1 IN0098.1	1.31	Vacant	Site acquired by WMCA for Darlaston Railway Station	Remove allocation.	Very Good (2017 EDNA)	Site acquired by WMCA for Darlaston Railway Station.

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Heath Road / Kendricks Road, Darlaston	SAD IN99.2 IN0099.2 WAE099	0.44	Vacant	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Site is near proposed Darlaston Railway Station so could become more attractive to development once this opens Surrounded by industry so no feasible alternative use
Former IMI South of Canal, Darlaston Road, Pleck (Phoenix 10 Site A - Part)	SAD IN103.2 IN0103.2 WAE103	0.84	Vacant	No change in circumstances.	Retain employment allocation.	Premium (2017 EDNA)	Site reclamation under way
Former IMI Works, Pleck (Phoenix 10 Site A - part)	SAD IN104.1 IN0104.1 WAE104	9.45	Vacant	No change in circumstances.	Retain employment allocation.	Premium (2017 EDNA)	Site reclamation under way
North of IMI, Pleck (Phoenix 10 Site B)	SAD IN104.4 IN0104.4 WAE106	4.09	Vacant	No change in circumstances.	Retain employment allocation.	Premium (2017 EDNA)	Site reclamation under way
Adjacent to Ikea, Steelmans Road, Wednesbury	SAD IN107.3 IN0107.3	0.93	occupied by non-employment use	Now used as overflow car park for IKEA customers so not available for employment use	Remove allocation	Good (2017 EDNA)	Planning permission for shoppers' car park granted in 2017 (17/0136)
James Bridge Gasholders Site, Darlaston Road, Walsall	SAD IN110 IN0110 WAE110	8.22	Vacant	No change in circumstances.	Retain employment allocation.	Premium (2017 EDNA)	Council is working up funding and delivery package
North of Watery Lane	SAD IN0071.2	0.63	Vacant	No change in circumstances	Retain employment allocation.	Very good (2017 EDNA)	Site owned by wedge group.

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
	WAE071						
Rear of Woods Bank Trading Estate, Woden Road West, Darlaston	SAD IN118.2 IN0118.2 WAE118	1.2	Vacant	Planning permission granted for employment development.	Retain employment allocation.	Very Good (2017 EDNA)	Current planning permission for container storage (17/0687)
Former Moxley Tip, Moxley Road	SAD IN122 IN0122 WAE122	10.38	Vacant	Planning application submitted for employment development.	Retain employment allocation.	Premium (2017 EDNA)	Planning permission for B2/B8 (18/1233 granted 12/11/20.
Bentley Mill Way East (Phoenix 10 Site C)	SAD IN205 IN0205 WAE205	2.4	Vacant	No change in circumstances.	Retain employment allocation.	Premium (2017 EDNA)	Landowner is working up proposal and funding
Moxley junction	SAD IN205 IN120.5 WAE120	0.48	Vacant	No change in circumstances.	Retain employment allocation.	Not assessed	
Casino and Cinema, Bentley Mill Way	SAD IN315 IN0315 WAE315	4.58	Occupied by non-employment use	No change in circumstances.	Retain employment allocation.	Very Good (2017 EDNA)	Cinema closed due to Covid. Owner has no intention to re-open and is pursuing other uses for site
Millers Close, Bentley Mill Way	SAD IN317 IN0317 WAE317	0.82	Vacant former restaurant	Planning permission granted for employment development.	Retain employment allocation.	Good (2017 EDNA)	Planning permission for car storage and rental (Sui generis use) December 2018 (18/1424).
Willenhall Sewage Works	SAD IN333 IN0333 WAE333	8.9	Vacant	No change in circumstances.	Retain employment allocation.	Premium (2017 EDNA)	Funding package being worked up. Needs new bridge to provide access.

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Hughes Road, Moxley	SAD IN341 IN0341 WAE341	4.37	Vacant	No change in circumstances.	Retain employment allocation.	Good (2017 EDNA)	Dependent on getting access from BCSR or through adjacent employment land in Wolverhampton (site 735). Market interest in development of site.

Wolverhampton

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Bilston Urban Village	BCAAP MU3 737 WOL47 WOE737	6.0	Vacant	Site owned by CoWC and delivery strategy in preparation.	Retain employment allocation.	Very good (2017 EDNA)	Abnormal costs associated with previous use. Strong market interest and site on the market.
Chillington Fields	BCAAP EDO 2 WOL42 WOE761	0.6	Vacant	CoWC owned and used for informal open space.	Retain employment allocation.	53 (CFR) (2017 EDNA)	No significant constraints. No recent planning permissions but forms part of East Park masterplan area.
Citadel Jcn extension - see Hughes Rd	BCAAP EDO 13 735 WOE735	3.2	Vacant	Site part owned by CoWC and delivery strategy in preparation.	Retain employment allocation.	Good (2017 EDNA)	Abnormal costs associated with previous use. Market interest in bringing site forward. Directly adjacent to IND341 in Walsall and

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
							could be developed as part of this larger site also including WOL23.
Hickman Avenue	BCAAP EDO 4 WOL18a WOE754	0.7	Vacant	No change in circumstances since AAP adoption.	Retain employment allocation.	74 (2017 EDNA)	No known significant constraints. Lapsed planning permission 06/0556/FP 28/7/06 for B1, B2 and B8 units.
Inverclyde Drive (Hilton Trading Estate)	BCAAP EDO 10 WOL21 WOE757	1.4	Vacant	No change in circumstances since AAP adoption.	Retain employment allocation.	Very good (2017 EDNA)	No constraints and site available. Landowner has confirmed the site is available for development.
Mammoth Drive, Wolverhampton Science Park	SRCAAP EDO 12 727 WOE727	0.8	Vacant	Site owned by CoWC and delivery strategy in preparation.	Retain employment allocation.	Very good (2017 EDNA)	No constraints and site available. No recent planning applications.
Powerhouse	BCAAP EDO 6 WOL39 WOE759	0.9	Vacant	Planning permission granted 2017 for gas powered electricity generation facility. Not implemented.	Retain employment allocation.	Good (2017 EDNA)	Constraints associated with retention of existing historic building. Planning permission 17/00960/FUL 18/12/17 for gas powered energy generation facility. Not implemented.
Rear of Spring Road	BCAAP EDO 9 WOL40 WOE760	0.7	Vacant	No change in circumstances since AAP adoption.	Retain employment allocation.	Very good (2017 EDNA)	No known significant constraints. No recent planning applications. Landlocked site suitable for extension of adjacent operation and not suitable for alternative uses.

Site Name	Current Site Ref (Local Plan) and BCP	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability since adoption of Local Plan?	Proposal (Retain Employment Allocation / Change or Remove Allocation)	EDNA assessment	Deliverability Commentary
Springvale Avenue	BCAAP EDO 11 734	0.7	Vacant	No change in circumstances since AAP adoption.	Retain employment allocation.	Very good (2017 EDNA)	No known significant constraints. Falls within outline planning permission c/1570/91 for B1, B2 and B8 development.
St Matthews Street	BCAAP EDO 3 WOL43	0.6	Vacant	CoWC owned and used for car parking.	Remove allocation.	Score 53 (2017 EDNA)	Operational land not available for development.
Stratosphere Site, Wolverhampton Science Park	SRCAAP EDO 11 726	0.7	Vacant	Site owned by CoWC and delivery strategy in preparation.	Retain employment allocation.	Very good (2017 EDNA)	No constraints and site available. No recent planning permissions.
Wolverhampton Business Park	SRCAAP EDO 4 725	1.9	Vacant	Site continuing to be built out in phases with 1.9ha remaining.	Retain employment allocation.	Very good (2017 EDNA)	No constraints and site available. Benefits from secured outline planning permission (11/11100/OUT) granted 13/5/11.
Crown Street / Cross Street North	SRCAAP EDO14 WOL36	2.1	Vacant	Vacant site with developer interest.	Retain employment allocation.	Very good (2017 EDNA)	No constraints. Planning permission 18/00911/ful granted 20/1/20 for bottom ash recycling facility.
Rear IMI Marstons	SRCAAP EDO2 WOL1	7.2	Vacant	Vacant site with strong developer interest.	Retain employment allocation.	Premium (2017 EDNA)	No constraints. Planning permission 23/00265/FUL for erection of two buildings for flexible employment purposes within use classes B2 and B8,

Appendix 3 – Review of sites with planning permission for employment (excluding Local Plan allocations with planning permission)

Dudley

Site Name	Current Site Ref (Local Plan) and BCP	BCP Site Assessment Report ref.	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability e.g. land owner intentions, change in circumstances since granting of planning permission?	Proposal (carry forward planning permission?)	EDNA assessment Score and recommendation.	Planning permission status and deliverability Commentary
No sites								

Sandwell

Site Name	Current Site Ref (Local Plan) and BCP	BCP Site Assessment Report ref.	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability e.g. land owner intentions, change in circumstances since granting of planning permission?	Proposal (carry forward planning permission?)	EDNA assessment Score and recommendation.	Planning permission status and deliverability Commentary
No sites								

Walsall

Site Name	Current Site Ref (Local Plan) and BCP	BCP Site Assessment Report ref.	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability e.g. land owner intentions, change in circumstances since granting of planning permission?	Proposal (carry forward planning permission?)	EDNA assessment Score and recommendation.	Planning permission status and deliverability Commentary
No sites								

Wolverhampton

Site Name	Current Site Ref (Local Plan) and BCP	BCP Site Assessment Report ref.	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability e.g. land owner intentions, change in circumstances since granting of planning permission?	Proposal (carry forward planning permission?)	EDNA assessment Score and recommendation.	Planning permission status and deliverability Commentary
Fmr Starr Rd Transport Depot, Dale Street	Not allocated but within High Quality Employment Area.	SA-0051-WOL	0.9	Vacant land within existing employment area.	Vacant site suitable for development.	Allocate.	Not assessed but strong developer interest in bringing site forward.	No known constraints. Planning permission 13/01194/ful granted 10/2/14 for change of use to scrapyard. Strong developer

Site Name	Current Site Ref (Local Plan) and BCP	BCP Site Assessment Report ref.	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability e.g. land owner intentions, change in circumstances since granting of planning permission?	Proposal (carry forward planning permission?)	EDNA assessment Score and recommendation.	Planning permission status and deliverability Commentary
	WOL51. WOE763							interest in bringing site forward.
Land behind Keyline Builders Merchants, Willenhall Road	Not allocated. WOL50 WOE694	SA-0052-WOL	1.2	Vacant land to the rear of existing builders merchant.	Vacant site suitable for development.	Allocate.	Very good (2017 EDNA)	No constraints. Planning permission 13/00285/ful granted 24/6/16 for class B8 storage building. Strong developer interest in bringing site forward.
Millfields Road, Ettingshall	Not allocated but within Local Quality Employment Area. 658 WOE658	SA-0044-WOL	0.7	Vacant.	Vacant site suitable for development.	Allocate.	Not assessed but strong developer interest in bringing site forward. Not suitable for alternative uses.	Planning permission 12/00205/ful granted 18/6/12 for rebuild of existing warehouse not started. Strong developer interest in bringing site forward.

Site Name	Current Site Ref (Local Plan) and BCP	BCP Site Assessment Report ref.	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability e.g. land owner intentions, change in circumstances since granting of planning permission?	Proposal (carry forward planning permission?)	EDNA assessment Score and recommendation.	Planning permission status and deliverability Commentary
Fmr. Strykers, Bushbury Lane	Not allocated but within High Quality Employment Area, SA-0045-WOL / 149	SA-0045-WOL.	0.8	Vacant (fmr Bowling centre)	Landowner has submitted amended plans.	Allocate	21. Potentially suitable (2019 site assessment).	Planning permission 19/01003/ful granted 6/12/19 for erection of Self-storage building with B1 Offices with associated landscaping and parking.
Mecca Bingo Club Springvale Way	Not allocated but within Spring Vale Retail Park. Not assessed	Not assessed	1.4	Existing bingo club	No change.	Site can contribute towards supply but do not allocate due to uncertainty over delivery timescales.	Not assessed.	Planning permission 22/00459/FUL granted 14/12/22 for demolition of the Mecca Bingo site and its replacement with a new industrial warehouse.
Citygate Park, Stafford Rd	Not allocated but within High Quality Employment	Not assessed	1.3	Vacant land	No change.	Site can contribute to supply but do not allocate as site owner is progressing	Not assessed.	Planning permission 23/01228/FUL granted 21/2/24 for Extension to existing production/warehouse facility and erection of

Site Name	Current Site Ref (Local Plan) and BCP	BCP Site Assessment Report ref.	Site area (ha)	Current Use (vacant / greenfield / other)	Any Changes to Suitability / Availability e.g. land owner intentions, change in circumstances since granting of planning permission?	Proposal (carry forward planning permission?)	EDNA assessment Score and recommendation.	Planning permission status and deliverability Commentary
	Area. Not assessed.					with development.		new warehouse facility.

Appendix 4 – Additional sources of supply (non-Green Belt)

Dudley

Site Name	Site Ref (site assessment group / DLP Ref)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
Bean Road, Coseley	H16.1 SA-0214-DUD DLPE07	2.2	O	Vacant	Housing	37. Potentially suitable (2020 site assessment).	Vacant site within area subject to Local Plan housing allocation. Current owners wish to bring forward for employment development.
Land off Amber Way, Coombeswood Industrial Park	E14.1 DLPE09	0.5	O	Vacant	Within Strategic Employment area.	Not assessed.	The site comprises an underutilised space within an existing high quality employment area, the site has good connections to nearby motorways.
Land adjacent to railway, Pedmore Road (Blackbrook Salvage)	E11a.1 DLPE10	0.9	O	Vacant	Within Strategic Employment area.	Not assessed.	The site currently comprises an underutilised site within an existing high quality employment area. The site does appear to have an established access point.
Hardstanding area to south, Silver End Trading Estate	E11b.3 DLPE11	0.4	O	Vacant	Within Strategic Employment area.	Not assessed.	Site is within existing employment area and represents underutilised space. Likely that new access point would need to be established.

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Sandwell

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
Whitehall Rd, Tipton	246a and 246b SA0030-SAN SAE246	5.3	O	Vacant	Not designated.	58. Potentially suitable (2019 site assessment)	The site lies within Tennants Distribution inner zone making it unsuitable for residential development.
Conygree, Newcomen Dr.	124 SA0026-SAN SAE176	6.9	CFS	Vacant land	Housing	38. Potentially suitable. (2020 site assessment)	The site was submitted through the Call for Sites process for employment use. The site assessment assessed the site for employment use and identified the site as being vacant land within an industrial estate. Planning permission 21/65676 granted for industrial development.
Land Adj To Asda Wolverhampton Road Oldbury	200 SA-0042-SAN SAE329	1.6	O	Vacant land	Local Employment Area	35. Potentially suitable. 2020 site assessment)	Site owners proposed employment and is therefore available for that use. Recent refusal of the employment use (DC/19/63297) has indicated that the site has constraints which need to be mitigated to protect residential amenity, provide appropriate access and ensure that a future scheme does not cause severe congestion on an already busy highway network.
Rounds Green Road/Shidas Lane, Oldbury	253q(8) SA-0043-SAN SAE253	2.8	CFS	Vacant	Local Employment Area	38. Potentially suitable (2020 site assessment)	Vacant site in established employment area and submitted through Call for Sites process. Surrounding commercial uses would be compatible with an employment use on the site. Site now under construction.

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
British Gas, Land off Dudley Rd, Oldbury	261 SA-0044-SAN SAE261	1.1	O	Vacant	Housing H9.1 (1196)	36. Potentially suitable (2020 site assessment)	Vacant site subject to Local Plan Housing allocation but with no evidence of aspirations to bring forward for residential. Site has three adjacent occupied employment sites. Would be difficult to bring forward for residential without the adjacent sites.
Land adj to M5 Jcn 2	SA0027-SAN SAE329	1.6	CFS	Vacant.	Local Employment area.	41. Potentially suitable (2020 site assessment).	Site submitted through call for sites process for employment. Has historically benefited from permission for office uses/casino/hotel uses the most recent in 2015 for a restaurant / public house use expired in October 2018
Severn Trent land, off Roway Lane	SA0028-SAN SAE158	3.7	CFS	Vacant	Part Local Employment area, part not allocated.	36. Potentially suitable (2020 site assessment).	Site submitted through call for sites process for employment.
Legacy 43, Ryder Street, West Bromwich	SA-0045-SAN SAE258	0.9	O	Vacant	Not allocated.	Very good (2017 EDNA).	The area is mainly industrial and the introduction of further employment land into the area would be acceptable. Site has been marketed for employment development.
Brandon Way/Albion Road, West Bromwich	216b	1.5	O	Vacant	Housing	Not assessed	Site being actively marketed for employment uses.
Lion Farm, Oldbury		2.0	O	Vacant	Open space	Not assessed	Site owned by the Council.

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Walsall

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
No sites.							

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Wolverhampton

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
Dean Rd / Neachells Lane	703b SA-0047-WOL	6.7	CFS	Area of informal open space.	Open space.	64 Potentially suitable (2019 site assessment)	Site owned by City Council and due diligence work progressing.
Fmr MEB site, Major Street / Dixon Street	662b SA-0034-WOL	2.5	O	Vacant land within established employment area.	Not allocated.	62. Potentially suitable (2019 site assessment)	Landowner interest in bringing site forward for development.

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Appendix 6 – Responses to BCA WMI 2024 engagement

Good morning,

I am approaching you on behalf of the Black Country Councils and Birmingham City Council in relation to the apportionment of the land consented at West Midlands Interchange in South Staffordshire. You will be aware that all five of us have a shortfall in our supply of land for employment, as well as for housing.

I contacted your authority about this issue in 2021 as part of the preparation of the Black Country Plan. I am conscious that things have moved on since then, and we need to establish an up to date position in order to inform Local Plan preparation – particularly in relation to the Dudley, Sandwell, Wolverhampton and Birmingham Local Plans which are moving to Regulation 19 stage over the course of the next six months.

By way of background, the West Midlands Interchange (WMI) Development Consent Order was approved by the Secretary of State in May 2020. The site is located on land west of M6 Junction 12 in South Staffordshire and will provide a Strategic Rail Freight Interchange (SRFI) with warehousing and other associated development. When built, it will provide up to 743,200 square metres (sq m) of new rail-served and rail-linked warehousing on a site of some 297ha, of which around 200ha is dedicated to B8 uses. In 2021, Stantec consultants were commissioned to advise on how the development is likely to contribute to meeting employment land needs arising in the areas served by the site with a focus on the Black Country. The Report is attached. The key context to the work is the established fact that the Black Country is unable to meet its economic needs in full within the urban area.

The Report advised that the SRFI is very strongly linked to the Black Country economy but recognises that the 'service area' for the site covers an extensive area, including a number of neighbouring local authorities, including Birmingham, which has more recently confirmed a significant shortfall of employment land as evidenced in the emerging Local Plan. The key element of the Report is Table 5 (copied below).

Table 5 Distribution of local land share (net additional plus displacement)

	Net additional employment		Total
	ha	Share	
South Staffordshire	2	1	3
Dudley	13	0	13
Sandwell	17	2	19
Walsall	17	2	19
Wolverhampton	14	2	16
Black Country market total	63	7	70
Birmingham	45	0	45
Cannock Chase	0	4	4
Lichfield	4	0	4
Solihull	13	1	14
Stratford-upon-Avon	0	0	0
Wednesbury	0	1	1
Wynne Forest	1	0	1
Birmingham market total	64	5	69
Sheffield Greater City	0	0	0
Stoke-on-Trent	0	7	7
East Staffordshire	0	0	0
Stafford	0	0	0
Staffordshire Moorlands	0	0	0
Total	127	12	139

Source: VDA, ONS and Stantec analysis

This sets out, based on the method set out in the Report, how the quantum of land at WMI could be apportioned between the areas within the market area. In 2021, the Black Country Councils approached all areas listed in table 5 to understand whether:

- is the adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere.
- is the adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs.

The responses to these questions are attached and at the time, indicated that only the Black Country wished to 'claim' any of the consented land. Since then, we are aware that the Cannock Chase Local Plan is 'claiming' their 10ha apportionment, Birmingham their 53ha apportionment and South Staffordshire 18.8ha. The balance of the land remains 'unclaimed'.

Moving forward, we need to refresh the position in the light of Local Plan progress made since 2021. With this in mind, we would like to update and add to the questions in 2021 and would be most grateful of your response to them:

- Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?
- Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?
- If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?

On the basis of the responses to these questions, we intend to progress a Statement of Common Ground that will serve to formalise the position.

I would be grateful if you could respond to the questions 1-3 as soon as possible, ideally by the end of July, and would be happy to meet with you to discuss further if this would be helpful.

Kind regards

Ian

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Lead Planning Manager (Regional Strategy)
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City of Wolverhampton Council

West Midlands Interchange apportionment – responses to DtC engagement. July 2024

Local authority and contact	Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?	Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?	If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?	Apportionment set out in Stantec Study (table 5)(ha)
Birmingham Market Area				
Cannock Chase	No response.	No response. The 2024 South Staffordshire FEMA Statement of Common Ground states that the 2024 Regulation 19 Local Plan seeks to provide for up to 74ha of land for employment uses and this incorporates the 10ha of land apportioned to Cannock Chase. Cannock Chase Council does not consider that it has a surplus in employment land provision that could meet needs arising elsewhere.	No response.	10
Lichfield	The adopted Lichfield Local Plan does not identify strategic warehousing space to meet wider than local need. You will recall that the now withdrawn emerging Local Plan also only identified sufficient land to meet Lichfield's employment needs with no further land available to meet wider unmet needs.	As noted above the now withdrawn Local Plan noted that there was a limited supply of employment land to meet needs within Lichfield District. Further to this work is underway on a HEDNA to support the new Local Plan for Lichfield. As such we are in the process of establishing the employment land requirements for the District and whether these can be accommodated within the district where there is an evidenced limited supply of potential employment land. As	Not applicable – see answer to question 2.	8

Local authority and contact	Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?	Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?	If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?	Apportionment set out in Stantec Study (table 5)(ha)
	Following the withdrawal of the emerging Local Plan the council is in the early stages of preparing a new local plan which has not yet advanced to the stage of identifying employment land requirements or allocations. Work on a HEDNA is currently underway to inform the new Lichfield Local Plan.	such, it would be my view that there is a case for the proportion at WMI which the evidence states could be apportioned to Lichfield may be required and at this stage the Council cannot confirm that it would not look for this to contribute toward Lichfield's own needs.		
Solihull	No response	No response. The Local Plan review Economic Growth Technical Paper advises that the HEDNA identifies the need for between 5.2 and 6.6ha of additional land to meet general employment needs and that this is being addressed by allocations in the Plan.	No response. The Local Plan review Economic Growth Technical Paper advises that the HEDNA identifies the need for between 5.2 and 6.6ha of additional land to meet general employment needs and that this is being addressed by allocations in the Plan.	13
Bromsgrove	A review of the Bromsgrove Local Plan is underway with consultation on draft proposals expected later this year. Therefore Bromsgrove and Redditch Councils are not in a position to	Bromsgrove and Redditch Councils both published up to date HEDNAs in 2022. Both Bromsgrove and Redditch Councils are currently unable to confirm if a contribution from the WMI would be sought to meet one or both of the Council's needs due to where the Councils are with their respective stages	See previous comments above. Furthermore, Bromsgrove Council and Redditch Council consider central government's proposals on planning reform significant in this matter, and decisions on West Midlands wide issues which as this	8

Local authority and contact	Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?	Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?	If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?	Apportionment set out in Stantec Study (table 5)(ha)
	confirm if the Councils can assist with shortfalls elsewhere.	of plan-making process. We ask that those possible apportionments are held in reserve should the Councils require them.	should only be made via the new strategic planning route not under the current arrangements.	
Redditch	A review of the Redditch Local Plan is due but no timetable has been set. Therefore Bromsgrove and Redditch Councils are not in a position to confirm if the Councils can assist with shortfalls elsewhere.	Bromsgrove and Redditch Councils both published up to date HEDNAs in 2022. Both Bromsgrove and Redditch Councils are currently unable to confirm if a contribution from the WMI would be sought to meet one or both of the Council's needs due to where the Councils are with their respective stages of plan-making process. We ask that those possible apportionments are held in reserve should the Councils require them.	See previous comments above. Furthermore, Bromsgrove Council and Redditch Council consider central government's proposals on planning reform significant in this matter, and decisions on West Midlands wide issues which as this should only be made via the new strategic planning route not under the current arrangements.	1
Wyre Forest	Our Adopted Local Plan allocates enough land over the Plan Period to meet the requirement as set out in the Wyre Forest Employment Land Review (2018).	I would therefore think it is safe to assume that Wyre Forest does NOT require the 5ha allocation at the West Midlands Interchange.	I would therefore think it is safe to assume that Wyre Forest does NOT require the 5ha allocation at the West Midlands Interchange.	5
Stoke on Trent Market Area				
Newcastle under Lyme	The Newcastle-under-Lyme Borough Council Local Plan (at Regulation 19 stage) is being consulted on from the 12 August until the 7 October 2024. The emerging Local Plan includes a	The Council does not look to the WMI to make a contribution to the Borough Council's employment needs. Newcastle-under-Lyme is considered very much to be at the periphery of the WMI geography.		4

Local authority and contact	Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?	Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?	If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?	Apportionment set out in Stantec Study (table 5)(ha)
	strategic employment site, reference AB2, Land at Junction 16 which proposes an element of logistics and distribution uses. The Final Draft Local Plan pursues a strategy of meeting the needs identified in the Borough Council's Housing and Economic Needs Assessment in full	Further information on the Local Plan and the current consultation can be viewed by accessing the following website link: https://www.newcastle-staffs.gov.uk/planning-policy/local-plan		
Stoke on Trent	No response.	No response. The March 2021 HEDNA identified a number of employment land scenarios and a forecast of supply. Under some of these scenarios there is a significant shortfall of employment land.	No response. The March 2021 HEDNA identified a number of employment land scenarios and a forecast of supply. Under some of these scenarios there is a significant shortfall of employment land.	7
East Staffordshire	No.	Yes, the plan is adopted, it was adopted in 2015. The Plan is up to date and ESBC are not looking for WMI to make a contribution towards meeting the employment needs of ESBC as part of the current plan.	No objections to the ESBC apportionment being apportioned to those areas which can evidence a shortfall of Class B8 floor space, however we would like to discuss where our apportionment is proposed to be distributed to.	8
Stafford	No response.	No response. The 2024 South Staffordshire FEMA SoCG states that Stafford Borough	No response.	3

Local authority and contact	Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?	Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?	If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?	Apportionment set out in Stantec Study (table 5)(ha)
		Council's latest 2022 Regulation 18 Preferred Option consultation sets out the borough's current position on employment land provision. This indicates there is no surplus in employment land provision to be exported through the Duty to Cooperate to the Black Country. Stafford Borough Council does not require the 8ha share of West Midlands Interchange attributed to the borough in the work to apportion land from that site.		
Staffordshire Moorlands	No response. The response to the 2021 engagement stated that Staffordshire Moorlands Local Plan was adopted in September 2020. The plan includes the former Regional Investment Site at Blythe Vale (48.5ha) which is now allocated for 300 homes and employment use. The employment element is additional to that identified as being necessary to support the needs of the District. B1, B2 and B8 uses would be considered appropriate.	No response. The response to the 2021 engagement stated that The Local Plan seeks to meet the need for B8 in full. This was informed by our Employment Land Review Update report (2017) - https://www.staffsmoorlands.gov.uk/media/2286/employment-land-review-update-2017/pdf/41306_06_ELRL_Update_New_Report_08.12.16.pdf?m=1499178063700 . As such, we will	No response. The response to the 2021 engagement stated that The Local Plan seeks to meet the need for B8 in full. This was informed by our Employment Land Review Update report (2017) - https://www.staffsmoorlands.gov.uk/media/2286/employment-land-review-update-2017/pdf/41306_06_ELRL_Update_New_Report_08.12.16.pdf?m=1499178063700 . As such, we will	0

Local authority and contact	Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?	Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?	If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?	Apportionment set out in Stantec Study (table 5)(ha)
	The site is bi-sected by the A50. The land to the north of the A50 is being developed for housing by St Modwen. This would leave the plot to the south of the A50 for employment (28.5ha)	not look to you to make a contribution to meeting our requirements.	not look to you to make a contribution to meeting our requirements.	
Black Country Market Area				
South Staffordshire	As you are aware, South Staffordshire Council consulted on its second Regulation 19 consultation in April 2024 that included an employment land target of 107.45ha up to 2041, excluding WMI, that met South Staffordshire's objectively assessed need for employment land as well as a 45.2ha contribution of unmet needs of the Black Country FEMA. This is currently reflected in a draft Statement of Common Ground across the South Staffordshire FEMA and is the result of having a pipeline of employment land in the district (as at the base date of April 2023), in addition to a	The emerging South Staffordshire Local Plan will meet the district's objectively assessed needs for employment land (including B8 floorspace) in full and is supported by the Council 2022 Economic Development Needs Assessment (EDNA) and subsequent 2024 EDNA update. Our EDNA included a detailed assessment of the impacts of WMI for South Staffordshire from both a supply and demand perspective. As detailed in previous Duty to Cooperate correspondence the Black Country authorities in June 2022, the South Staffordshire EDNA utilises economic forecasting and projected labour demand to conclude that a 18.8ha share of WMI for South Staffordshire is appropriate. Whilst our EDNA takes a more in depth approach to	South Staffordshire Council believes it has robust up to date evidence to justify a 18.8ha claim of WMI. However, should other authorities not need to claim any of WMI, South Staffordshire Council would support authorises with an unmet need for employment land (currently Black County FEMA, and Birmingham) claiming any surplus land at WMI where this is necessary to contribute towards an unmet need.	5

Local authority and contact	Is your adopted or emerging Local Plan is promoting strategic warehousing space that is justified on the basis of meeting wider than local need, and so may be available to assist shortfalls elsewhere?	Is your adopted or emerging Local Plan pursuing a strategy of meeting the needs for B8 floorspace in full locally, and is this supported by an up to date Economic Development Needs Assessment? If this is the case, then could you confirm that you would not look for WMI to make a contribution towards meeting your own needs?	If you have no reason to claim all of your apportionment as set out in the Stantec Report, then would you have any objections to the unclaimed amount being apportioned to those areas which can evidence a shortfall of Class B8 floorspace?	Apportionment set out in Stantec Study (table 5)(ha)
	further strategic allocation at Junction 13 M6, that exceeds South Staffordshire's identified needs. Whilst specific sites are not attributed to cross boundary needs, there is potential that some of this pipeline may come forward as strategic warehousing space.	calculating our share of WMI than the 2021 Stantec report which is largely based on an approach of using projected population change for each authority within the sites market area as a proxy for apportioning the site to those authorities, we still consider that the Stantec Study is a reasonable basis for determining wider authorities' potential share of the site given its wider role and in the absence of sub-regional details of labour demand.		

Appendix 6 – Additional sources of supply (Green Belt)

Dudley

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
No sites							

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Sandwell

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
No sites							

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Walsall

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
Land to the South East of Longwood Bridge	SA-0286-WAL	1.3	SAP	Vacant overgrown land	Green belt	36. Potentially suitable (2021 site assessment)	Site has no other constraints that cannot be mitigation for and is in a sustainable location near to existing employment uses. Landowner interest in bringing site forward for development.
Sandown Quarry	SA-0308-WAL	20.4	CFS	Operational quarry.	Green belt	32. Potentially suitable (2021 site assessment)	Only available in long term as site will need to stabilise following completion of landfill. Landowner interest in bringing site forward for development through call for site submission.
Johnsons Farm and Meadow Farm	SA-0200-WAL	8.4	SAP	Agricultural land	Green belt	34. Potentially suitable (2021 site assessment)	Landowner interest in bringing site forward for development. Highway infrastructure improvements would be required, however these improvement can be achieved using land within the parcel and would not be extensive. Current planning application (part of 23/1600)
237 Watling Street	SA-0007-WAL	5.9	CFS	Farmland and buildings	Green belt	38. Potentially suitable (2021 site assessment)	No significant constraints. Landowner interest in bringing site forward for development.
Land to the south of Bentley Lane	SA-0057-WAL	11.3	CFS	Open space	Green belt	35. Potentially suitable (2021 site assessment)	Landowner actively working up development proposals. Current planning application (23/1501). Resolution to grant 31/10/24 .. Current planning application (part of 23/1600)

Walsall Appendix 5 – review of new sources of supply (Green Belt)									

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Wolverhampton

Site Name	Site Ref (site assessment group and employment group mapping)	Site area (ha)	Site type*	Current Use (vacant / greenfield / other)	Current Local Plan allocation	EDNA assessment score	Deliverability Commentary
No sites							

* - CFS (call for site) / SAP (site assessment parcel) / O (other) / SHLAA

Appendix 7 – Employment land supply by Local Authority Area

Source	Land supply (ha)				
	Dudley	Sandwell	Walsall	Wolverhampton	Black Country (2041/2042)
Completions 2020-24 net additional land.	17.1	11.8	27.7	22.6	79.1
Local Plan allocations carried fwd.	6.9	5.3	93.5	26.6	132.4
Large sites (over 0.4ha) with planning permission	0.0	0.0	0.0	6.3	6.3
Small sites (less than 0.4ha) with planning permission.	1.2	0.7	0.0	0.7	2.6
Large sites windfalls	-	-	-	-	62.9 / 66.6
Small sites windfalls	-	-	-	-	6.8 / 7.2
Other sources of supply (non GB)	4.0	26.9	0.0	9.3	40.1
Black Country Green Belt	0.0	0.0	47.29	0.0	47.3
Total	29.2	44.6	168.5	65.4	377.5 / 381.6