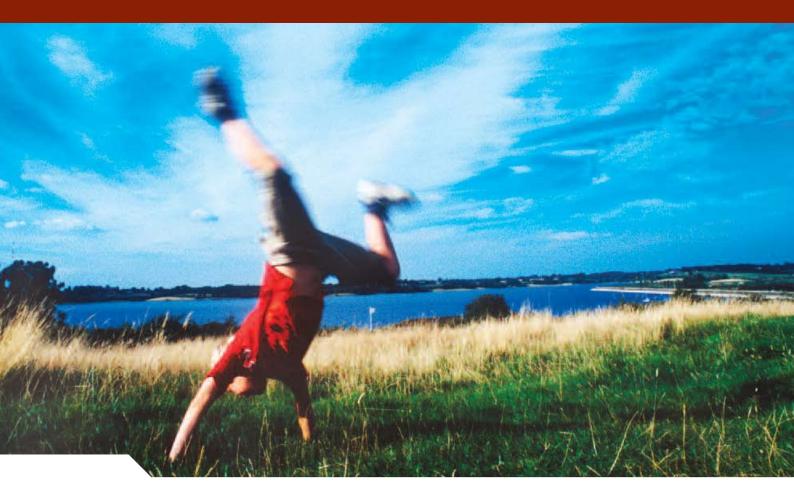
West Midlands Regional Spatial Strategy Phase Two Revision - Preferred Option Employment Land Provision Background Paper Revised version March 2009





INTRODUCTION

- 1.0 The Regional Planning Body has been requested to provide further guidance to Local Planning Authorities on the quantification of future employment land requirements for their areas, as part Phase Two of the Revision of the Regional Spatial Strategy. Producing further guidance on employment land requirements is seen as a key issue for the Revision, as it will inform the preparation of Core Strategies under the new planning legislation. Former Structure Plans provided guidance to Local Planning Authorities on employment land requirements but Structure Plans have been abolished under the Planning and Compulsory Purchase Act 2004.
- 1.1 The objective in trying to quantify land requirements is seeking to ensure that the Regional Spatial Strategy in conjunction with the Regional Economic Strategy will provide a flexible and robust supply of employment land to support sustainable economic development and growth across all parts of the Region. This should be achieved in a way which is supportive of the Spatial Strategy which itself is responsive to wider issues such as Climate Change and addresses the issue of under-performance in key parts of the Region.
- 1.2 This report concentrates on the provision of employment land but it is important to stress that the policies in the RSS Revision also emphasise the importance of an adequate supply of business premises and these can be particularly important in providing space for new businesses and Small Medium Enterprises. The employment land policies also emphasise the importance of providing a portfolio of land and premises to meet the needs of businesses of all types, size and quality and, in so far as can be predicted at this stage, anticipated change in the make up of economic activities.
- 1.3 The West Midlands Employment Land Advisory Group (WMELAG) were requested to carry out a study into future employment land requirements on behalf of the Regional Planning Body (RPB). WMELAG is chaired by the Prosperity for All Lead Officer Dave Carter and consists of members from Local Planning Authorities, Advantage West Midlands, the West Midlands Business Council and other interest groups. The results of this study are summarised in this background paper. This revised version of the Background Paper was published in March 2009 and clarifies that the employment land figures run to 2026 and that the 5-year minimum reservoir forms part of the longer term requirements rather than an additional requirement. Changes were made mainly to paragraphs 4.3, 4.4 and 4.5 and appendices 1 and 2 to clarify these issues.
- 1.4 Additional background to the employment land policies in Phase Two of the RSS Revision can be found in:

- West Midlands Regional Logistic Study Stage 1 by King Sturge (June 2004)
- West Midlands Regional Logistic Study Stage 2 by MDS Transmodal Ltd., Savills and Regeneris Consulting (September 2005)
- 2005 Regional Employment Land Study (2005)
- Regional Centres Study by Roger Tym & Partners and King Sturge (March 2006)
- 1.5 All of these reports are available on the West Midlands Regional Assembly Website <u>www.wmra.gov.uk</u>. Further information on the West Midlands Regional Economic Strategy is available on Advantage West Midlands Website <u>www.advantagewm.co.uk</u>.
- 1.6 For further information on this background paper please contact:

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EMPLOYMENT LAND POLICIES IN DEVELOPMENT PLANS IN RELATION TO THE QUANTIFICATION OF EMPLOYMENT LAND

- 2.0 The first stage of the study was to review existing guidance and methodologies in development plans in the West Midlands. Two areas have been investigated:
 - How employment land quantitative provision is expressed in policy within Structure Plans and Metropolitan Area Unitary Development Plans (UDPs).
 - The methodologies used to estimate employment land requirements

How employment land quantitative provision is expressed in policy within Structure Plans and Metropolitan Area UDPs.

2.1 All County Structure Plans and Metropolitan Area UDPs were examined to see how employment land requirements were quantified. In the majority of cases, a figure for the total amount of employment land to be provided for the entire plan period was set out either in policy or the written justification. In two cases, a 'plan, monitor, manage' or minimum reservoir approach was taken (Birmingham City Council and Shropshire County Council), which sets out a minimum amount of land to be readily available at all times throughout the plan period. More detail on the two approaches is discussed below.

Total Allocation for the Development Plan Period

- 2.2 This approach sets out an employment land requirement (expressed in hectares) for the entire plan period that should be met either by allocated or windfall sites.
- 2.3 Where this approach is used in the Shire Counties (Staffordshire, Warwickshire and Worcestershire), a requirement is expressed for the County as a whole and each constituent District authority. Each District authority then takes this forward and allocates sites as appropriate (taking account of estimated windfalls to come forward) to meet their provision figure. For the Shire Counties, the employment land provision figure is for the period 1996-2011. The Staffordshire and Worcestershire Plans imply that there is some flexibility when applying the figures, but there should not be significant deviations.
- 2.4 In the Metropolitan Areas, UDP policies set out how this figure is to be met by individual sites and allowances for windfalls.

Minimum Reservoir Approach

2.5 Both Birmingham City Council and Shropshire County Council express employment land requirements in terms of the need to have a minimum

reservoir of land available at all times. This is a 'plan, monitor, manage' (PMM) approach to the provision of employment land, rather than a 'predict and provide' approach.

- 2.6 Birmingham City Council sets out the minimum requirements categorised between Best Urban, Good Urban and Other Urban submarkets. An indication of the annual build rate is also provided. The reservoir consists of 'readily available' land i.e. land which is free from development constraints. The time period over which the reservoir applied varies depending on the category of land. The minimum reservoir targets are reviewed regularly and if demand is shown to be greater than expected additional sites can be brought forward.
- 2.7 The Shropshire Structure Plan follows a similar approach (with the exception of Telford and Wrekin). Minimum allocations of land that should be made available at any one time for each individual district are set out in Policy P9. Rather than sub-divide the allocations into sub-markets (as in the Birmingham Development Plan), Policy P9 states that the minimum allocations should contain a portfolio of good quality sites, which are well located, accessible and available.
- 2.8 Policy P9 also allows for reserve sites to be identified to meet longer term employment needs. However, any reserved sites should not be brought forward unless the portfolio reduces below the Structure Plan minimum. In Shropshire, because a minimum supply of land is expressed, more land can be made available depending on local circumstances. However, the plan clearly states that over-supply should be avoided because it could prejudice employment land take up in other areas.
- 2.9 Interestingly, the previous Shropshire Structure Plan used land allocations for the whole period, rather than the PMM approach, but it was found to result in large areas of allocated land sitting idle and only gradually taken up. The PMM approach is preferred because an amount of land can be provided initially then further sites can be brought forward in response to demand. Similarly, Birmingham states that the PMM approach provides flexibility in relation to demand peaks and troughs. Birmingham consider that there are great difficulties in identifying a total amount of land for the whole period because of the amount of land required to be identified, difficulty in predicting redevelopment opportunities and problems associated with creating a large reservoir of land which remains vacant for many years.

Other Considerations

RIS, MIS and RLS Sites

2.10 In general, Regional Investment Site (RIS), Major Investment Site (MIS) and Regional Logistic (RLS) site allocations are handled separately from general employment land requirements and are

therefore not included in total industrial land provision figures for the entire plan period or minimum reservoir figures. There are separate policies for these regionally significant sites in County Structure Plans, Local Plans and UDPs, which set out the allocations for RIS, MIS and RLS (as appropriate).

Methodology for Establishing Employment Land Requirements

- 2.11 The group reviewed existing methodologies uses by the Metropolitan Authorities and Shire Counties in the West Midlands. This review found that there is not one consistent approach to estimating employment land requirements, with a mixture of approaches being used. In the Shire Counties, regard has been given to a number of factors including current commitments, a balance between housing and employment growth, reducing the need to commute, a need to address areas of deprivation, deficiencies in a portfolio of quality sites, historic take up rates and a need to compensate for expected job losses. Some of these factors have been quantified, others are expressed in more general terms.
- 2.12 In Worcestershire a methodology was devised to ensure a balance between housing and employment; for every new 70 dwellings provided, 1 hectare of employment land should be provided. In Warwickshire Employment land figures were calculated based on three aspects:
 - to meet the needs from job losses from manufacturing (to recycle redundant sites and transfer of jobs from manufacturing to the service sector), need for 160-180 hectares.
 - to meet the projected increase in service sector employment (need for 320 hectares).
 - to reduce unemployment (need for 80 hectares).
- 2.13 Consideration was also given to existing commitments and past take up rates.
- 2.14 In the Metropolitan Area a range of approaches were used. These were mainly demand-based and included past rates of development, assessment of business inquiries and demand for sites to meet certain market sectors.

Conclusions

2.15 There are two main methods of expressing the quantification of employment land to be built during the plan period in development plans across the region: a total amount that is to be build over the entire plan period and a 'plan, monitor, manage' minimum reservoir approach. The minimum reservoir approach has been adopted by two

authorities because of its flexibility in responding to peaks and troughs in demand and redevelopment opportunities that come forward. WMELAG felt that there were considerable advantages in using the minimum reservoir approach. In particular, there are two key benefits:

- It avoids large areas of land being allocated over a long time period.
- It gives flexibility to adjust targets based on the performance of the economy. This flexibility could be particularly important given the ongoing structural changes within the economy.
- 2.16 The methodologies used to quantify employment land are wide ranging, there is not one set methodology that has been applied across the region. Different approaches have been suitable for different areas.

THE METHODS CONSIDERED

- 3.0 The next stage of the study was to analyse the data available to estimate future employment land requirements in the West Midlands. Two key methods of projection were considered.
- 3.1 The first method is labour demand projections. This method can be used to estimate changes in employment levels per industrial sector and then converts them into equivalent employment land requirements over a specified period of time. Cambridge Econometrics prepared this data for use in the Regional Centres Study, 2005. The consultants (Roger Tym & Partners) have agreed that it is now the property of the Regional Assembly and is therefore used as the basis for the labour demand model. Birmingham City Council's Economic Information and Strategy in-house Local Economy Forecasting Model (LEFM) developed by Cambridge Econometrics provided a further source of data. The LEFM is a regional economy model, which uses data from the Census of Population and from the various ONS employment data sources. Its typical outputs are employment forecasts broken down by gender, full and part time, industrial sector and skill group.
- 3.2 The second methodology is based on the analysis of past development rates. The Regional Employment Land Study (RELS), formerly known as the Regional Industrial Land Study (RILS). RELS is produced annually to provide a description and analysis of the employment land supply position within the West Midlands Region. The RELS report has been produced since the mid-1980's and provides a reliable source of data on development trends. Past rates of development can be projected forward to give an estimate of future land requirements. These figures can be produced at a District level.

Labour demand projections

- 3.3 The first methodology which the group considered is labour demand projections. This methodology estimates changes in employment levels for each industrial sector and then converts them into equivalent employment land requirements over a specified period of time. This is based on the understanding that if a given number of people are currently employed on a specified area of land, then changes in future employment levels similarly imply changes in future employment land requirements. The main assumption here is that the sectoral employment densities will remain stable over the period under analysis.
- 3.4 It is important to recognise that the figures produced by this model are net figures. The model does take into account the predicted decline in employment in sectors such as manufacturing and this decline is translated into a negative land requirement for this sector.
- 3.5 The methodology follows the following steps:

- (1) Current sectoral employment levels are compiled from official data sources such as the Annual Business Inquiry (ABI).
- (2) Future sectoral employment level forecasts are generated by the LEFM.
- (3) Predicted changes in sectoral employment over the specified period are computed.
- (4) Sectoral employment changes are then converted into floor space required. Employment densities vary by use.
- (5) Sectoral floor space is in turn converted into site (land) area using plot ratios.
- 3.6 The model highlights a number of trends within the economy including:
 - Demand for employment land will be concentrated in the service sectors such as Banking, Finance and Energy.
 - Growth will also occur in the industrial sectors of distribution and construction.
 - Employment land in the manufacturing sector will decline considerably.

Strengths and weaknesses of Labour Demand Model

3.7 Strengths

• Is based on future trends in the economy, such as the decline in the manufacturing sector and growth in the service sector

3.8 Weaknesses

- Relies on floorspace density assumptions considerable variations in total depending on which density assumptions used.
- The model predicts a significant decline in employment for manufacturing with a corresponding decline in land for manufacturing. The decline in employment is however, unlikely to lead to such a high corresponding decrease in land requirements. New manufacturing investment continues to take place in the West Midlands as demonstrated by RELS. This investment can involve a high land take even though the jobs generated are relatively low by historic standards, due to the increasingly automated nature of modern manufacturing. A decline in workforce as a firm rationalizes its operations also does not always result in a corresponding decline in floorspace requirements.

- It is difficult for Local Planning Authorities to allocate land on a net basis, as this involves predicting where factory closures are likely to take place.
- 3.9 Due to the above WMELAG considered that the model significantly under-estimates future land requirements and had serious limitations in its potential to be applied across the Region. Work on the model was therefore abandoned following initial results which showed land requirements at such a low level that they could not be given serious consideration.

Past Trends

- 3.10 The second methodology which the group considered was based on past trends. RELS monitors all land committed for an industrial/employment use in excess of 0.4 hectares (gross developable area) and falling within use classes B1b (research and development), B1c (light industrial), B2 (general industrial) and B8 (warehouse and distribution) of the Town and Country Planning Use Classes Order. Committed sites are those which are either allocated in a Development Plan, have planning permission, a committee resolution or appeal decision. The Study also monitors B1a office development outside City and Town centres. B1a uses within City and Town centres are monitored as part of the Centres Monitoring Report.
- 3.11 As RELS contains data on completions for employment uses dating back to the mid-1980's it is possible to predict the future growth of the economy based on past performance over 5, 10 or even 15 year periods. Taking an average rate of development over a long period helps to smooth out effects associated with economic or development cycles, drawing out underlying trends.
- 3.12 The figures produced using this model are gross figures. This is because the model only takes into account the amount of land that is needed for development. It does not take into account the loss of employment land i.e. losses resulting from the decline in manufacturing where the land is no longer needed and becomes available for other uses such as housing.
- 3.13 The past trends approach formed the basis of the consultation on the RSS Spatial Options. The figures included in the Spatial Options document are included in Table 1. The table below is based on an analysis of employment land completions monitored by RELS over the last 10 years. Two growth rates have then been applied to the figures. Over the ten-year period (1995-2004) output in the Region grew at an annual average rate of 2.2%. The Regions output growth is forecast to grow at a slightly higher annual average rate of 2.4% during the next 15 years. Indicative longer term demand figures are also illustrated for the period 2001 to 2026. These give an indication of the land required for

employment use over a 25 year period should past trends be replicated.

- 3.14 The RELS analysis in Table 1 does not include completions on Regional Logistics Sites, Major Investment Sites or Regional Investment Sites. These sites are treated separately. Based on this approach significant land requirements are identified for the Metropolitan Area, Staffordshire and Warwickshire with a total of 5,000 hectares being required for the Region over a 25-year period.
- 3.15 The consultation on the Spatial Options for the RSS showed strong support for the inclusion of District level employment land figures within the RSS. However, the consultation also highlighted a number of the issues with the past trends approach. The overall strengths and weaknesses of this approach are summarised below:

3.16 Strengths

- Past trends are a useful and reliable point of reference using an established data source RELS.
- Over a short time period such as 5 years, past trends are likely to be the most reliable source for estimating land requirements. There reliability will decrease the further into the future they are used.

3.17 Weaknesses

- As projections are based on historic trends, the projections do not necessarily reflect the policy aspirations of the RSS. An example of this is that historically more employment land will be required in the West Midlands' non-Major Urban areas than in the Major Urban Areas (MUAs). The RSS aims to focus development within the MUAs.
- The projections also do not reflect future trends in the economy. For example, the growth in the service sector as compared to the decline in manufacturing.
- Past trends do not relate to the emerging strategy for housing and population growth.

Conclusions

3.18 Each of the models considered by WMELAG have strengths and weaknesses. The labour demand model has a number of advantages but in practice the model consistently underestimates land requirements and as such could not be considered as a sufficiently reliable method. WMELAG therefore considers that the past trends model offers the most effective way forward. The potential weaknesses of the past trends model can be overcome by developing an approach which take additional factors into account as discussed below.

Table I – Roo Spatial Options (Past					
Total	1995-04	Indicative readily available 5	Indicative readily	Indicative	
hectares	Ave.	year	available 5 year	longer	
developed	Completions	figure based on	reservoir figure based on 2.4%	term	
1995-04		2.2% historic growth rate	forecast	requirements	
		of output	growth rate output	2001 - 2026	
				590 - 645	
124.4	12.4	62	68	310 - 340	
66.5	6.7	34	37	170 - 185	
150	15	75	82	375 - 410	
32.4	3.2	16	18	80 - 90	
78.1	7.8	39	43	195 - 215	
72.1	7.2	36	39	180 - 195	
759.2	75.9			1900 - 2080	
			24	110 - 120	
43.9	4.4	22	24	110 - 120	
72.4	7.2	36	39	180 - 195	
4.7	0.5	2		10.0 - 15.0	
				50 - 55	
5.3	0.5	2	3	10.0 - 15.0	
_ • • •	_				
				60 - 65	
				15 - 20	
				145 - 170	
			24	110 - 120	
	5.5			140 - 150	
33.9	3.4	17	19	85 - 95	
32.2	3.2	16	18	80 - 90	
100.7	10.1	51	55	255 - 275	
				105 - 110	
				140 - 155	
12.2	1.2	6	7	30 - 35	
			206	945 - 1030	
				215 - 235	
2 -					
83.9	8.4	42	46	210 - 230	
56.7	5.7	29	31	145 - 155	
65.5	6.5	33	36	165 - 180	
73.7	7.4	37	40	185 - 200	
	Total hectares developed 1995-04 235.7 124.4 66.5 150 32.4 78.1 72.1 759.2 43.3 43.9 72.4 4.7 20.2 5.3 24.3 7 61.5 43.3 54.6 33.9 32.2 100.7 41.4 55.5 12.2 373.8 85.7 83.9 56.7 65.5	Total 1995-04 hectares Ave. developed Completions 1995-04 235.7 23.6 124.4 12.4 66.5 6.7 150 15 32.4 3.2 78.1 7.8 72.1 7.2 759.2 75.9 43.3 4.3 43.9 4.4 72.4 7.2 4.7 0.5 20.2 2 5.3 0.5 24.3 2.4 7 0.7 61.5 6.1 43.3 4.3 32.2 3.2 100.7 10.1 41.4 4.1 55.5 5.6 32.2 3.2 100.7 10.1 41.4 4.1 55.5 5.6 12.2 1.2 373.8 37.4 85.7 8.6	Total 1995-04 Indicative readily available 5 year hectares Ave. year developed Completions reservoir figure based on 2.2% historic growth rate of output 235.7 23.6 118 124.4 12.4 62 66.5 6.7 34 150 15 75 32.4 3.2 16 78.1 7.8 39 72.1 7.2 36 759.2 75.9 380 43.3 4.3 22 72.4 7.2 36 75.3 0.5 2 20.2 2 10 5.3 0.5 2 24.3 2.4 12 7 0.7 3 61.5 6.1 29 43.3 4.3 22 54.6 5.5 28 33.9 3.4 17 32.2 3.2 16 100.7	Total hectares 1995-04 Ave. readily available 5 year reservoir figure based on 2.4% forecast Indicative readily available 5 year 1995-04 Completions Indicative readily figure based on 2.4% forecast 235.7 23.6 118 129 124.4 12.4 62 68 66.5 6.7 34 37 150 15 75 82 32.4 3.2 16 18 78.1 7.8 39 43 72.1 7.2 36 39 43.3 4.3 22 24 43.9 4.4 22 24 43.9 2.4 12 13 7 0.5 2 3 30 20.2 2	

Redditch	14.6	1.5	7	8	35 - 40
Bromsgrove	36.3	3.6	18	20	90 - 100
Wyre Forest	4.7	0.5	2	3	10.0 - 15.0
Worcester	25.5	2.6	13	14	65 - 70
Wychavon	44	4.4	22	24	110 - 120
Malvern Hills	18.4	1.8	9	10	45 - 50
Worcestershire	143.5	14.4	71	79	355 - 395
Total	1863.1	186.3	933	1022	4665 - 5110

* Figures rounded

DEVELOPING THE PREFERRED OPTION

- 4.0 The final stage of the study was to develop a preferred option which could be applied to all Districts in the Region. The analysis of existing guidance and plans and methodologies for calculating land requirements suggested that the preferred option should be based on the following principles:
 - A minimum reservoir approach to employment land requirements.
 - Employment land requirements based on an analysis of past trends but adjusted to take into account a number of other factors

The minimum reservoir

4.1 The minimum reservoir would consist of readily available land and would act as a rolling reservoir to be maintained through a plan period. The reservoir would be based on a 5-year period of demand. The reservoir will need to be subject to regular annual monitoring to assess performance as compared to estimated requirements. The benefits of the minimum reservoir have been noted above.

Employment land requirements

- 4.2 The group considers that the most effective and reliable methodology is one based on past trends. During the consultation on the spatial options a number of important weaknesses with the past trends approach were highlighted. A revised model has therefore been developed which takes account of a number of additional factors. These factors are summarized below:
 - Variations in average rates of development over 5/10 year periods.
 - The need to make an allowance for small sites less than 0.4 hectares which are not covered by RELS. This recognizes that small sites can make an important contribution to development particularly in rural areas.
 - The need to consider past rates of provision in existing plans.
 - The provision of regionally significant sites within a District. Regionally significant sites are treated as separate from the general employment land requirements. However, the provision of such sites can influence the need for general employment land at a local level.
 - Cross boundary issues. The supply of employment land in some areas is constrained and it is likely that to accommodate future growth cross boundary provision may be needed in some areas.

Where this is the case then the RSS should build in such requirements.

- The relationship to housing provision. The supply of housing will increase significantly in future years particularly in some areas, and there is a need to ensure that there is a balance between employment land provision and housing growth.
- The balance between MUA and non-MUA provision. The RSS strategy seeks to focus growth towards the Major Urban Areas. Employment land provision needs to reflect this objective.
- Seek input from District and County Councils.
- 4.3 The factors outlined above are illustrated in Diagram 1. Past rates of development act as a starting point for calculating land requirements with adjustments then being made. Following the adjustments a 5-year minimum reservoir requirement is identified. The minimum reservoir requirement is a gross requirement rather than net. Industrial land which will be lost to non-industrial uses including housing is not therefore included in this figure. The 5-year figure is considered to be a reliable estimation of likely short term requirements and this amount of land should be provided for at the start of the plan period. Plans should make reasonable allowances for the likely recycling of employment land through redevelopment.
- 4.4 The minimum reservoir figure is then multiplied by three to create the indicative longer-term requirements which cover the period to 2026. The consultation on the spatial options showed support for the inclusion of longer-term requirements. Local authorities will need to test the longer-term figures through preparation of Core Strategies as the reliability of the past trends approach will decrease over time. These figures are therefore indicative. The indicative longer-term requirements have been set cautiously to avoid the unnecessary release of large amounts of land. This was achieved by multiplying the 5 year reservoir figure for each area by 3 rather than 4 on the grounds that it appears unlikely that the development rates applied in the 5-year reservoir will continue year on year for the full 20 year plan period.
- 4.5 The identification and release of land will need to be controlled through a Plan, Monitor and Manage approach. If the testing of the longer term requirements showed a decline or higher level of employment land requirements in the future then adjustments would need to be made to the minimum reservoir to reflect this later in the plan period. This is part of a Plan, Monitor, Manage approach. It is important to recognise that the longer term requirement is **not** in addition to the minimum reservoir figure. The minimum reservoir forms part of the longer-term requirement.

- 4.6 Diagram 1 formed the basis of the estimation of the land requirements for individual authorities in the West Midlands. The derivation of the estimates are shown in Appendix 1. During the preparation of the figures WMELAG sought to consult and engage with County and District Councils. Meetings were arranged on a County-by-County basis to which Districts were also invited to attend. The input of Local Planning Authorities into the study was seen as vital and played a key role identifying important local issues including cross boundary issues. The comments received from these authorities are summarized in the appendix and where appropriate adjustments have been made to the figures to reflect the comments made.
- 4.7 A key adjustment made to the past trend figures involved considering the relationship to housing growth. To ensure that sufficient employment land was being identified to meet the future growth in housing the indicative longer-term requirements were compared with the number of dwellings being proposed for a District. This enabled a comparison to be made between Districts across the West Midlands and it was possible to identify Districts with a potential shortage of employment land. The minimum reservoir figures for these areas could then be increased. A further comparison was made in relation to the population of an area and unemployment rates. The final table showing these calculations is included Appendix 2.
- 4.8 The final results of the methodology are included in Policy PA6B of the RSS Phase Two Revision. The proposed distribution of employment land reflects on the one hand a satisfactory split between MUAs and non-MUAs but it must be recognized that the past allocation strategies have a bearing on the proposed distribution and that the current proposals represent a direction of change that will need to be continued in future RSS Revisions.

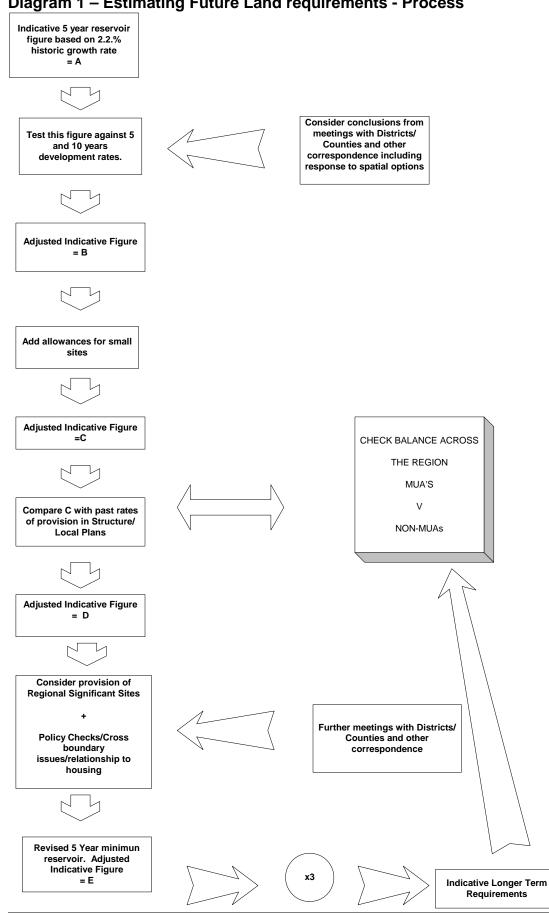


Diagram 1 – Estimating Future Land requirements - Process

APPENDIX 1 - APPLYING THE METHODOLOGY TO INDIVIDUAL AUTHORITIES

A1.1 Birmingham

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 118 hectares

5/10 year average completion rates

Ten year average 23.9 hectares

Five year average 23.8 hectares

B = 120 hectares

Consultation comments and meeting (May 2007)

Agree with the minimum reservoir approach and support figures in spatial options.

C = 120 hectares

Allowance for small sites

22 hectares over 10 years – 2.2 hectares per year.

D = 130 hectares

Current policies

Minimum reservoir of 124 hectares across the portfolio of employment land.

D = 130 hectares

Regionally significant sites/Cross boundary issues

None provided at present but with potential for RIS at Longbridge and East Aston.

E = 130 hectares

Indicative longer term requirements

E x 3 = 390 hectares indicative longer-term requirements

(2006 RELS supply 237 hectares)

Housing -

Population mid-year 2004 (16 yrs +) 768,600

Indicative longer-term requirement per 10,000 population = 5.07 hectares

Net working baseline 2006 - 2026 = 50,600 dwellings

Indicative longer-term requirement per 1000 dwellings = 7.70 hectares

Black Country

A1.2 Dudley

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 34 hectares

5/10 year average completion rates

Ten year average 5.2 hectares

Five year average 2.8 hectares

B = 26 hectares

Consultation comments and meeting (May 2007)

See combined figure A1.6.

C = 26 hectares

Allowance for small sites

2000 – 2004 9.49 hectares – 1.89 hectares per year.

D = 28 hectares

Current policies

Black Country Study identified the need for 1600 ha of high quality employment land to serve the sub-region by 2031. 540 hectares is required for manufacturing and 1050 for logistics.

D = 28 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 28 hectares

Indicative longer term requirements

84 hectares

(2006 RELS supply 43 hectares)

Housing – Population mid-year 2004 (16 yrs +) 254,100

RSS policy PA6B includes combined figures for the Black Country - see combined figure A1.6 below.

A1.3 Sandwell

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 75 hectares

5/10 year average completion rates

Ten year average 13.4 hectares

Five year average 8.3 hectares

B = 65 hectares

Consultation comments and meeting (May 2007)

See combined figure A1.6.

C = 65 hectares

Allowance for small sites

Last ten years 11 ha – 1.1 hectares per year.

D = 70 hectares

Current policies

Black Country Study identified the need for 1600 ha of high quality employment land to serve the sub-region by 2031. 540 hectares is required for manufacturing and 1050 for logistics.

D = 70 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 70 hectares

Indicative longer term requirements

210 hectares

Housing – Population mid-year 2004 (16 yrs +) 225,300

RSS policy PA6B includes combined figures for the Black Country - see combined figure A1.6 below.

(2006 RELS supply 135 hectares)

A1.4 Walsall

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 39 hectares

5/10 year average completion rates

Ten year average 7.8 hectares

Five year average 4.8 hectares

B = 39 hectares

Consultation comments and meeting (May 2007)

See combined figure A1.6.

C = 39 hectares

Allowance for small sites

1.4 hectares per annum.

D = 46 hectares

Current policies

Black Country Study identified the need for 1600 ha of high quality employment land to serve the sub-region by 2031. 540 hectares is required for manufacturing and 1050 for logistics.

D = 46 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 46 hectares

Indicative longer term requirements

138 hectares

Housing – Population mid-year 2004 (16 yrs +) 198,900

RSS policy PA6B includes combined figures for the Black Country - see combined figure A1.6 below.

(2006 RELS supply 112 hectares)

A1.5 Wolverhampton

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 36 hectares

5/10 year average completion rates

Ten year average 7.8 hectares

Five year average 6.8 hectares

B = 36 hectares

Consultation comments and meeting (May 2007)

See combined figure A1.6.

C = 36 hectares

Allowance for small sites

2.8 hectares per annum on sites less than 1 ha.

D = 41 hectares

Current policies

Black Country Study identified the need for 1600 ha of high quality employment land to serve the sub-region by 2031. 540 hectares is required for manufacturing and 1050 for logistics.

D = 41 hectares

Regionally significant sites/Cross boundary issues

Wobaston Road (South Staffordshire) 85 hectare MIS/RIS, Hilton Cross, South Staffordshire. RIS 6.73 hectares remaining, Wolverhampton Business Park (RIS) 7.30 hectares remaining.

E = 41 hectares

Indicative longer term requirements

123 hectares

Housing - Population mid-year 2004 (16 yrs +) 191,200

RSS policy PA6B includes combined figures for the Black Country - see combined figure A1.6 below.

(2006 RELS supply 57 hectares)

A1.6 Black Country Combined

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 184 hectares

5/10 year average completion rates

Ten year average 34.2 hectares

Five year average 22.7 hectares

B = 166 hectares

Consultation comments and meeting (May 2007)

Figures provide the Black Country with enough land for new sites. Phase 1 of the RSS Review shows that not all of the requirements of the Black Country will be met within the urban area. Some quality employment land requirements may need to be met in South Staffordshire including a potential Regional Logistic Site to serve the needs of the Black Country. Sandwell and Dudley are concerned that the minimum reservoir may be slightly too high based on recent rates of completion.

C = 166 hectares

Allowance for small sites

19 hectares per annum on sites less than 1 ha.

D = 185 hectares

Current policies

Black Country Study identified the need for 1600 ha of high quality employment land to serve the sub-region by 2031. 540 hectares is required for manufacturing and 1050 for logistics.

D = 185 hectares

Regionally significant sites/Cross boundary issues

Wobaston Road (South Staffordshire) 85 hectare MIS/RIS, Hilton Cross, South Staffordshire. RIS 6.73 hectares remaining, Wolverhampton Business Park (RIS) 7.30 hectares remaining.

E = 185 hectares

Indicative longer term requirements

E x 3 = 555 hectares indicative longer term requirement

Housing – Population mid-year 2004 (16 yrs +) 869,500

Indicative longer-term requirement per 10,000 population = 6.38 hectares

Net working baseline 2006 - 2026 = 61,200 dwellings

Indicative longer-term requirement per 1000 dwellings = 9.06 hectares

(2006 RELS supply 347 hectares)

Further Comments from Wolverhampton CC following meeting with Black Country Authorities (September 2007)

Joint Core Strategy for the Black Country – Employment Land requirements

This note seeks to reconcile the employment land requirements arising from Phase 2 of the Review of the Regional Spatial Strategy with those set out in the emerging Joint Core Strategy for the Black Country.

1. Phase 2 figures

The most up to date employment land requirement for the Black Country set out in the Phase 2 RSS review is 555ha 2006-21. This requirement excludes provision of land at regionally significant sites (RIS, MIS and RLS).

This figure is based largely on past take up rates and equates to new development only. In other words, it does not seek to quantify the total stock of employment land (operational and available) that Development Plan Documents should provide for.

2. Joint Core Strategy

Employment land requirements

The approach used to quantify employment land requirements set out in the emerging Joint Core Strategy (JCS) has two major differences from that used in RSS Phase 2. Firstly, the JCS quantifies total required employment land – operational and available. Secondly, the basis for the requirements is econometric, with assumptions based on a large body of technical work undertaken for Phase 1 of the RSS Review.

The JCS Issues and Options Paper (June 2007) identifies the need for 1,600ha of high quality employment land to serve the needs of the Black Country to be provided by 2026. It identifies the need for a further 950ha of 'local' employment land, 350ha

of which will be within mixed use development areas. The total required quantum of employment land is this 2,550ha.

The most recent assessment of employment land within the Black Country was undertaken by GVA Grimley in 2005. This work identifies some 600ha of existing Good Quality employment land in the Black Country. The JCS Issues and Options Paper identifies scope for a further 650ha of land within the Black Country to be capable of being classified as being of High Quality. On this basis, some 1 250ha of land within the Black Country is either already or has the potential to be high quality.

In terms of Local Employment Land, there is scope within the stock of employment land proposed to be retained (between 1300-1500ha) to accommodate this requirement.

Reconciling with Phase 2 requirements

- Step 1 allowance for land outside the Black Country. The total amount of new employment land anticipated by the JCS Issues and Options Paper is the difference between the existing stock of quality employment land (600ha) and that required (1 600ha). This is 1,000ha. Some of this will be met by land outside the Black Country at i54 (90ha), Hilton (20ha) and a new RLS to the north of the Black Country (around 50ha). Thus, at least some 160ha of the 1 000ha high quality employment land requirement may be provided outside the Black Country. This leaves a requirement of 840ha to 2026.
- Step 2 adjustment for different end dates. It is also necessary to discount the JCS requirement by 25% to allow for the difference in end date from the Phase 2 requirement (JCS runs to 2026 whereas RSS Phase 2 runs to 2021). By doing this, the requirement reduces from 840ha to 630ha.

On this basis, the RSS Phase 2 employment land target will provide 75ha too little land compared with the emerging JCS requirement. However, this 'shortfall' requires two significant qualifications:

- 1. The JCS employment land requirement and extent of existing capacity is being reviewed.
- 2. The 840ha shortfall of high quality employment land set out in the emerging JCS will not be met by new development alone. Infrastructure improvements, environmental enhancements and changes in occupiers can cumulatively improve an existing employment area to the extent that it can be reclassified as being of high quality, rather than locally significant. The extent of this source of capacity will be determined through the JCS technical work set out above.

3. Conclusions and next steps

This analysis suggests that the emerging RSS Phase 2 employment land target will not provide sufficient land to be consistent with the emerging JCS. However, at this stage, this difference is relatively small (75ha) and in any case, the JCS figures are subject to review. For these reasons, it is suggested that the current emerging RSS Phase 2 figures are retained, but are subject to a footnote which explains that they are subject to review and that this review will consider the need for cross boundary provision.

Final response from Prosperity for All Lead Officer

Agree that figures should be retained. It should be noted that the figures for the Black Country are a minima. Cross-boundary provision of regionally significant sites are already address in the RSS Revisions.

A1.7 Coventry

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 62 hectares

5/10 year average completion rates

Ten year average 12.4 hectares

Five year average 11.4 hectares

B = 62 hectares

Consultation comments and meeting (May 2007)

Agree with the 5-year minimum reservoir approach. Cross boundary issues identified in particular relationship to Warwickshire. Coventry would need to expand into the Green Belt to meet longer term indicative requirements and are carrying out a Green Belt review. Concern that longer term requirements are high but are supportive of the five year reservoir figure.

C = 62 hectares

Allowance for small sites

Not significant.

D = 62 hectares

Current policies

The Coventry Development Plan 1996-2011 calculates employment requirements based on an analysis of long term average rates of employment land take-up. Although the pattern is uneven, the 1990s have seen an average development rate of greenfield and redeveloped employment land of approximately 16 ha per year within the Plan area (the current City boundary). Fluctuations occur over time due to periods of boom and recession and the availability of new sites, particularly large sites. If this average were to continue over the period from 1998 (the base date for the employment land figures) to 2011, it would suggest that the Plan should ensure a supply of at least 208 ha of employment land over the Plan period.

D = 62 hectares

Regionally significant sites/Cross boundary issues

Ansty (Rugby), Peugeot – Ryton (85 hectares) redevelopment could contribute to the needs of Coventry.

E = 62 hectares BUT land at Ryton should be seen as principally meeting Coventry's needs beyond its boundary.

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 243,200

Indicative longer-term requirement per 10,000 population = 7.64 hectares

Net working baseline 2006 - 2026 = 33,500 dwellings

Indicative longer-term requirement per 1000 dwellings = 5.55 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

Need to increase figure to reflect higher housing growth. However, Coventry is expecting significant growth in the office sector and also wants to avoid releasing significant amounts of land for logistics, the demand for which is being met elsewhere in the sub-region.

Further comments from Warwickshire County Council (September and October 2007)

The Coventry CC employment land figure should be increased to 82 ha to reflect its MUA status and be consistent with our CSW Development Strategy. The reference to the former Peugeot Site contributing to Coventry's employment needs is both presumptive and overly prescriptive and should be deleted i.e. proximity to Coventry will be taken into account at the LDF stage.

Response from Prosperity for All Lead Officer (October 2007)

Increase Coventry's figure to 82 hectares. Continue to differ on the Ryton issue. If advice from Warwickshire County Council is followed which is that the Ryton site is a Rugby site to be considered in a future LDD, then the redevelopment of the whole site for employment purposes would exceed the identified long-term requirement for Rugby District. In contrast Coventry are unlikely to be able to accommodate all their needs within their existing boundary. This suggests that the linkage should be made and given the size of the Ryton site this is a legitimate matter where the Region might wish to take a view.

F = 82 hectares

Indicative longer term requirements

F x 3 = 246 hectares indicative longer-term requirements including land at Ryton within Rugby District.

(2006 RELS supply 58 hectares)

A1.8 Solihull

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 16 hectares

5/10 year average completion rates

Ten year average 3.1 hectares

Five year average 3.6 hectares

B = 16 hectares

Consultation comments and meeting (May 2007)

Agree with the 5-year minimum reservoir approach. Supportive of minimum reservoir figure identified in the spatial options.

C = 16 hectares

Allowance for small sites

2.7 ha of land developed over the last 10 years, 1 hectare over the last 5 years.

D = 17 hectares

Current policies

For the past decade or so, it has been recognised that Solihull's principal role in the provision of new business land should be at the high quality end of the spectrum. The designation of general business land was to be undertaken with caution so as not to undermine or prejudice urban regeneration policies, particularly in Birmingham.

D = 17 hectares

Regionally significant sites/Cross boundary issues

RIS at Birmingham Business Park (land supply 14.5 hectares) and Blythe Valley Business Park and extension (land supply 28.4 hectares).

E = 15 hectares – taking account of BBP extension and Solihull's desire to provide high quality sites.

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 159,700

Indicative longer-term requirement per 10,000 population = 2.81 hectares

Net working baseline 2006 - 2026 = 7,600 dwellings

Indicative longer-term requirement per 1000 dwellings = 5.92 hectares (based on E x 3)

Comments following further consultation (September 2007)

Solihull are supportive of the figures being proposed and offered the following detailed comments.

Additional comments Solihull MBC following meeting (September 2007)

DTZ were commissioned to do a sub-regional employment land study for the CSW districts. This looked ahead for requirements to 2016 and beyond that date to 2026. Figures were put forward based on the Cambridge Model and on Past Trends (PTU). As you might expect the results between methodologies are quite different.

However, comparing PTU from the DTZ study with the RSS review figures (for 'ordinary' business land), also PTU, the results seem fairly similar.

DTZ came up with an ('ordinary') employment land supply figure, at 2006, of about 35 ha and a PTU figure for Solihull of 32 ha 2006-2016 this would equate to a 48 ha requirement 2006-2021. i.e. 3 hectares greater than that proposed in the RSS Review.

The DTZ figures don't take account of balancing new housing/population with employment growth whereas the RSS Review figures do. On the other hand, the RSS review figures are a minimum for Solihull, are indicative and are required to be tested locally through the LDF process.

F = 15 hectares

Indicative longer term requirements

 $F \times 3 = 45$ hectares indicative longer term requirements

(2006 RELS supply 44 hectares)

A1.9 Telford & Wrekin

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 36 hectares

5/10 year average completion rates

Ten year average 9 hectares

Five year average 12.1 hectares

B = 45 hectares

Consultation comments

Suggested that 36 ha provision on the high side. Temper back to:

C = 35 hectares

Allowance for small sites

No data provided.

D = 35 hectares

Current policies

225 hectares of employment land in Telford 1996-2011 - SHROPSHIRE AND TELFORD & WREKIN JOINT STRUCTURE PLAN 1996 - 2011

D = 35 hectares

Regionally significant sites/Cross boundary issues

None identified

E = 35 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 126,200

Indicative longer-term requirement per 10,000 population = 8.32 hectares

Net working baseline 2006 - 2026 = 26,500 dwellings

Indicative longer-term requirement per 1000 dwellings = 3.95 hectares (based on E x 3)

Comments from Telford and Wrekin Council (September 2007)

The figure for Telford needs to be increased due to the low housing to employment land ratio. We would look for an indicative ratio that was above Shropshire but below the Mets and an indicative 15 year supply figure that looked more like 150 ha. This would still be below substantially what is allocated and enable us to progressively turn redundant employment land into housing.

Response from Prosperity for All Lead Officer

Agree that figures appear low in relation to housing requirements. Increase to 50 hectares 5-year reservoir appears reasonable and is still lower than existing supply.

F = 50 hectares

Indicative longer term requirements

F x 3 = 150 hectares indicative longer-term requirements

(2006 RELS supply 204 hectares)

Comments

Large existing land supply reflects new town designation.

A1.10 Herefordshire

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 22 hectares

5/10 year average completion rates

Ten year average 5.1 hectares

Five year average 6.3 hectares

B = 27 hectares

Consultation comments and meeting (May 2007)

Need to make allowance for small sites less than 0.4 hectares. Small sites play an important role in Herefordshire.

Allowance for small sites/

2.1 hectare per year

C = 7.2 hectares per annum/5 year reservoir = 37 hectares

Current policies

100 hectares of employment land for period 1996 to 2011. The approach assumes that for each hectare of land developed 20% would be for employment and 80% for housing.

D = 37 hectares

Regionally significant sites/Cross boundary issues

None identified

E = 37 hectares

Indicative longer term requirements

E x 3 = 111 hectares indicative longer term requirements

(2006 RELS supply 182 hectares)

Housing -

Population mid-year 2004 (16 yrs +) 144,700

Indicative longer-term requirement per 10,000 population = 7.67 hectares

Net working baseline 2006 - 2026 = 16,600 dwellings

Indicative longer-term requirement per 1000 dwellings = 6.68 hectares

Final comments of Prosperity for All lead Officer

Adjusted to reflect more recent past trends and small site allowance in particular.

A1.11 Stoke-on-Trent

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 22 hectares

5/10 year average completion rates

Ten year average 7.1 hectares

Five year average 12 hectares

B = 55 hectares

Comments from consultation exercise and meeting (May 2007)

Figure is too low with significant growth over the last 5 years.

Allowance for small sites

No data provided.

C = 55 hectares

Current policies

240 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 55 hectares

Regionally significant sites/Cross boundary issues

Trentham North and South – land supply on RIS = 41.05 hectares

E = 55 hectares

Indicative longer term requirements

E x 3 = 165 hectares indicative longer term requirements

(2006 RELS supply 282 hectares)

Housing -

Population mid-year 2004 (16 yrs +) 192,000

Indicative longer-term requirement per 10,000 population = 8.59 hectares

Net working baseline 2006 - 2026 = 11,400 dwellings

Indicative longer-term requirement per 1000 dwellings = 14.47 hectares

Final comments of Prosperity for All Lead Officer

Levels increased to reflect recent trends and regeneration priority.

<u>Shropshire</u>

A1.12 Bridgnorth

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 2 hectares

5/10 year average completion rates

Ten year average 0.5 hectares

Five year average 0.6 hectares

B = 3 hectares

Allowance for small sites

0.5 hectares per annum x 5 = 2.5 hectares.

C = 5 hectares

Current policies

10 hectares of employment land 1996 – 2011 – Shropshire and Telford and Wrekin Joint Structure Plan 1996-2011

D = 5 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 5 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 44,000

Indicative longer-term requirement per 10,000 population = 3.40 hectares

Net working baseline 2006 - 2026 = 2,500 dwellings

Indicative longer-term requirement per 1000 dwellings = 6 hectares (based on $E \times 3$)

Comments received from Shropshire CC

See comments from Shropshire County Council in A1.17.

F = 6

Indicative longer term requirements

F x 3 = 18 hectares indicative longer term requirements

(2006 RELS supply 17 hectares)

A1.13 North Shropshire District

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 10 hectares

5/10 year average completion rates

Ten year average 2.3 hectares

Five year average 2.9 hectares

B = 12 hectares

Allowance for small sites

1.6 hectares per annum x 5 = 8 hectares.

C = 20 hectares

Current policies

20 hectares of employment land 1996 – 2011 – Shropshire and Telford and Wrekin Joint Structure Plan 1996-2011

D = 20 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 20 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 47,600

Indicative longer-term requirement per 10,000 population = 12.6 hectares

Net working baseline 2006 - 2026 = 6,100 dwellings

Indicative longer-term requirement per 1000 dwellings = 9.83 hectares (based on E x 3)

Comments received from Shropshire County Council

See comments from Shropshire County Council in A1.17.

F = 22 hectares

Indicative longer term requirements

F x 3 = 66 hectares indicative longer term requirements

(2006 RELS supply 58 hectares)

A1.14 Oswestry District

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 2 hectares

5/10 year average completion rates

Ten year average 0.8 hectares

Five year average 0.8 hectares

B = 4 hectares

Allowance for small sites

0.9 hectares per annum x 5 = 4.5 hectares.

C = 8 hectares

Current policies

15 hectares of employment land 1996 – 2011 – Shropshire and Telford and Wrekin Joint Structure Plan 1996-2011

D = 8 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 8 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 31,000

Indicative longer-term requirement per 10,000 population = 7.74 hectares

Net working baseline 2006 - 2026 = 4,000 dwellings

Indicative longer-term requirement per 1000 dwellings = 6 hectares (based on E x 3)

Comments from Shropshire CC

See comments from Shropshire County Council in A1.17.

F = 8 hectares

Indicative longer term requirements

 $F \times 3 = 24$ hectares indicative longer term requirements

(2006 RELS supply 31 hectares)

A1.15 Shrewsbury and Atcham District

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 12 hectares

5/10 year average completion rates

Ten year average 2.7 hectares

Five year average 4 hectares

B = 16 hectares

Allowance for small sites

2.7 hectares per annum x 5 = 13.5 hectares.

C = 29 hectares

Current policies

35 hectares of employment land 1996 – 2011 – Shropshire and Telford and Wrekin Joint Structure Plan 1996-2011

D = 29 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 29 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 77,300

Indicative longer-term requirement per 10,000 population = 11.25 hectares

Net working baseline 2006 – 2026 = 8,200 dwellings (of which Shrewsbury 6,200 dwellings)

Indicative longer-term requirement per 1000 dwellings = 10.60 hectares (based on E x 3)

Comments received from Shropshire CC

See comments from Shropshire County Council in A1.17.

F = 28 hectares

Indicative longer term requirements

 $F \times 3 = 84$ hectares indicative longer term requirements

(2006 RELS supply 57 hectares)

Comments

Approach needs to reflect on Shrewsbury as a Settlement of Significant Development.

A1.16 South Shropshire District

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 3 hectares

5/10 year average completion rates

Ten year average 0.8 hectares

Five year average 0.8 hectares

B = 4 hectares

Allowance for small sites

0.6 hectares per annum x 5 = 3 hectares.

C = 7 hectares

Current policies

15 hectares of employment land 1996 – 2011 – Shropshire and Telford and Wrekin Structure Plan 1996-2011

D = 7 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 7 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 34,500

Indicative longer-term requirement per 10,000 population = 6.08 hectares

Net working baseline 2006 – 2026 = 4,900 dwellings

Indicative longer-term requirement per 1000 dwellings = 4.28 hectares (based on E x 3)

Comments from Shropshire County Council

See comments from Shropshire County Council in A1.17.

F = 8 hectares

Indicative longer term requirements

F x 3 = 24 hectares indicative longer term requirements

(2006 RELS 16 supply hectares)

A1.17 Shropshire County Council

Comments from consultation exercise and meeting (May 2007)

Likely to be a requirements for the County to work with Districts and possibly other Authorities i.e. Telford. Support figures down to District level and happy with reservoir approach. There is a need for indicative longer-term figures. Small sites are important to Shropshire and will have a significant effect on reservoir. An allowance should be made for these. Figures in Spatial Options are too low when compared with local data. With revisions to small sites figures should be ok.

Further Comments received from Shropshire CC (September 2007)

RSS Employment Land Targets

This note sets out for agreement a number of amendments to the Shropshire employment land requirements for inclusion in the RSS Phase 2 Preferred Option as discussed on 12 September 2007.

Indicative Reservoirs and Longer Term Employment Land Requirements

Shropshire has considered the proposed employment land targets circulated by email dated 4 September 2007 in relation to local evidence from the Shropshire Planning and Land Use Monitoring System. It is possible to reach general agreement on the proposed Indicative Reservoir especially at the County level but also for each of the Shropshire districts subject to some minor amendments which will only have a 'de minimis' impact on the overall target for Shropshire and for the broad thrust of the RSS Spatial Strategy.

The local evidence of development trends from 2001 to 2006 indicates that an Indicative Reservoir of 70ha would be appropriate for Shropshire. This level of provision is consistent with the RSS Preferred Option target for Shropshire with the additional 1ha making a small but important contribution to the Indicative Reservoir for Bridgnorth District.

The local evidence, however, indicates that the Indicative Reservoir for Shropshire should be distributed differently between the Shropshire districts. In addition, the local evidence identifies very precise district targets which could usefully be rounded to provide more appropriate Indicative Reservoir targets. These changes to the distribution of the Shropshire target comprise:

- modest increases in the Reservoirs for both Bridgnorth and South Shropshire Districts;
- significant increase in North Shropshire partly compensated by a lower Shrewsbury & Atcham target.

These changes to the scale and distribution of Shropshire's Indicative Reservoir targets comprise:

 Table 1 : Indicative Reservoir Targets for the RSS Phase 2 Preferred Option

	Preferred Option - Indicative Reservoir	Section 4(4) Evidence – Indicative Reservoir	Recommended Targets for Shropshire
Shropshire	69	70	72
Bridgnorth DC	5	6	6
Oswestry BC	8	7.5	8
North Shropshire DC	20	21.5	22
Shrewsbury & Atcham BC	29	27.5	28
South Shropshire DC	7	7.5	8

This would have the following affect on Indicative Longer Term Employment Requirements in the County:

Table 2 : Longer	Term	Employment	Land	Targets	for	the	RSS	Phase	2
Preferred Option									

	RSS Preferred Option	Recommended Targets for Shropshire
Shropshire	207 (177)	216
		-
Bridgnorth DC	15	18
Oswestry BC	24	24
North Shropshire DC	60	66
Shrewsbury & Atcham BC	87 (57)	84
South Shropshire DC	21	24

Reasoned Justification for Recommended Changes

Shropshire

These suggested changes lead to an increase of 3ha in the overall target for the Indicative Reservoir for Shropshire. This increase is considered to have only a limited impact on the RSS strategy but will make a significant contribution to the employment land portfolio in the County especially in small or remote rural districts like Bridgnorth and South Shropshire Districts.

Oswestry Borough, Bridgnorth District and South Shropshire District

The proposed increases in South Shropshire and Bridgnorth Districts (1ha each) reflect the need to encourage entrepreneurship and small business growth which is often frustrated by the lack of available business accommodation or investment opportunities. Small increases in the supply of employment land can widen the choice of opportunities and stimulate local demand. The proposed increase in the Oswestry target in relation to local evidence mirrors the Indicative Reservoir Target in the Preferred Option.

Shrewsbury and Atcham Borough

The minor reduction in the Shrewsbury & Atcham target (1ha) will have a 'de minimis' affect on Shrewsbury in the context of RSS Policy PA6A as a Settlement for Significant Development. The Indicative Reservoir is intended to be a 'minima' target that is likely to be exceeded in order to support the growth and development of Shrewsbury as a regional and national 'growth point'. There may however, be a number of potential large land releases along the boundary with Telford and Wrekin Borough during the RSS period which might contribute to or impact upon the employment land supply in the County and on the economic performance in Shrewsbury including the potential de-commissioning of Ironbridge Power Station and the re-development of the redundant British Sugar Plant at Allscott.

North Shropshire District

The minor adjustment to the Shrewsbury and Atcham target allied with the overall increase to the Shropshire target will have the greatest impact on North Shropshire District through the addition of a further 2ha to the Indicative Reservoir. The rationale for this increase is based on the strategic position of the district on the northern edge of the region and reflects the broad circumstances (and intentions) of many district authorities in the rural west in relation to:

- North Shropshire District adjoins the south Cheshire plain and North Staffordshire MUA and is close to the strategic centres of Shrewsbury and Telford which affords the potential for significant economic demand but also creates the potential for significant out-commuting to larger centres;
- location, situation and opportunities of the district are fuelling housing demand;
- to build the Core Strategy around RSS Spatial Strategy principles based on PPS1 guidance, the LPA needs a sustainable, innovative and productive economy delivering high levels of employment and building on successful local enterprise (including Muller's dairy production plant) based around an appropriate employment land target to satisfy local employment needs;
- local need is increasing with the continued decline in traditional rural industries driving the need for new forms of employment to reduce unemployment and capture local labour that is out-commuting;
- the local authority wants to improve the employment land portfolio across the 4 market towns (Market Drayton, Whitchurch, Wem and Ellesmere) by overhauling the range, quality and type of employment sites that are currently available including the de-allocation of unserviced land;
- at present, the supply of land in Market Drayton is limited and there is an acute shortfall in Wem where there are also issues in relation to the quality of existing floorspace and the scale of investment and AWM and Shropshire County Council are seeking to address some of these issues;
- improvements to the portfolio will require the allocation of larger sites where
 public-private partnership can justify the investment required to service key sites
 (i.e. Whitchurch requires improvements to the electricity supply for industrial /
 commercial use) and where owners can attract an economic return to overcome
 the marginal nature of rural employment sites;
- the local authority therefore wishes to deliver a strategy for the district that readily conforms to national and regional objectives and is also internally consistent and will not exacerbate a situation where local employment opportunities are out of step with housing provision.

North Shropshire District therefore needs a slightly more generous employment land target in the RSS Preferred Option to deliver a suitable employment land portfolio to meet the needs of the district.

Final response from Prosperity for All Lead Officer

The suggested changes to the figures by the County Council are relatively minor and reflect local circumstances and market conditions. The changes are therefore supported and are reflected in the final District figures.

Staffordshire Districts

A1.18 Cannock Chase

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 17 hectares

5/10 year average completion rates

Ten year average 4.6 hectares

Five year average 6.4 hectares

Comments from consultation exercise and meeting (May 2007)

Recent trends in completions have been high (M6 Toll effect) and figures could be too low. Unemployment is also high. Need to consider links to the Black Country.

B = 25 hectares

Allowance for small sites

0.715 hectares per annum x 5 = 3.57 hectares.

C = 28 hectares

Current policies

80 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 28 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 28 hectares

Other issues including relationship to housing

Population mid-year 2004 (16 yrs +) 73,900

Indicative longer-term requirement per 10,000 population = 11.36 hectares

Net working baseline 2006 - 2026 = 5,800 dwellings

Indicative longer term requirement per 1,000 dwellings = 14.48 (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

Cannock Chase are happy with the proposed figures and drew attention to their high rate of unemployment and the high rate of recent development partly linked to the M6 Toll effect. They also raised the issue of the possible redevelopment of Rugeley Power Station for housing and cross boundary links to Lichfield.

F = 28

Indicative longer term requirements

 $F \times 3 = 84$ hectares, indicative longer term requirements

(2006 RELS supply 91 hectares)

Final comments of Prosperity for All Lead Officer

- 1. No need to adjust for regionally significant sites.
- 2. Takes account of M6 Toll effects and local regeneration needs.

A1.19 East Staffordshire

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 51 hectares

5/10 year average completion rates

Ten year average 10.9 hectares

Five year average 8.8 hectares

B = 44 hectares (recognising role as a SRF)

Comments from consultation exercise and meeting (May 2007)

Figures in spatial options seem about right.

Allowance for small sites

1.3 hectares per annum x 5 = 6.5 hectares.

C = 50 hectares

Current policies

250 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 50 hectares

Regionally significant sites/Cross boundary issues

Drakelow power station site. If this comes forward with a major employment component then this should be seen as contributing to the supply in E Staffordshire. However, given the likely timescale it should not impact until land is available for development but the District Council should take account of this when considering the long-term provision as part of their Core Strategy, liaising closely with adjoining authorities.

E = 50 hectares

Other issues including relationship to housing – Population mid-year 2004 (16 yrs +) = 84,300

Indicative longer-term requirement per 10,000 population = 17.79 hectares

Net working baseline 2006 - 2026 = 12,900 dwellings

Indicative longer-term requirement per 1000 dwellings = 11.62 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

The figures for East Staffordshire appear high in relation to all housing, unemployment and population indicators. The supply of employment land is also high. 90% of East Staffordshire's housing will go to Burton-on-Trent. Need to ensure that employment land provision does not undermine urban renaissance in Stoke.

F = 50 hectares

Indicative longer term requirements

E x 3 = 150 hectares indicative longer term requirements without taking account of Drakelow.

(2006 RELS supply 189 hectares)

Final comments form Prosperity for All Lead Officer

Five-year reservoir reflects Settlement of Significant Development designation, thereby maintaining relatively high allocation level.

Proposals for the development of employment land on the site of the former Drakelow Power Station in South Derbyshire should be taken into account during the preparation of the Core Strategy for East Staffordshire.

A1.20 Lichfield

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 28 hectares

5/10 year average completion rates

Ten year average 6.4 hectares

Five year average 7.4 hectares

B = 32 hectares

Comments from consultation exercise and meeting (May 2007)

Supply high but need to ensure link to housing, no change.

Allowance for small sites

0.29 hectares per annum x 5 = 1.46 hectares.

C = 33 hectares

Current policies

185 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 33 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 33 hectares

Other issues including relationship to housing

Population mid-year 2004 (16 yrs +) 76,700

Indicative longer-term requirement per 10,000 population = 12.90 hectares

Net working baseline 2006 - 2026 = 8000 dwellings

Indicative longer-term requirement per 1000 dwellings = 12.37 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

Fradley accounts for a significant element of supply in Lichfield (around 70%). There is also a significant element of out-commuting. Figures though appear high in relation to housing provision, unemployment, and population indicators.

F = 33 hectares

Indicative longer term requirements

33 x 3 = 99 hectares indicative longer term requirements

(2006 RELS supply 130 hectares)

Final comments from Prosperity for All Lead Officer

Existing supply appears adequate. Fradley not considered to warrant RLS designation. Aware that past rates of development driven by high completions in B8 and out-of-centre offices.

A1.21 Newcastle-under-Lyme

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 21 hectares

5/10 year average completion rates

Ten year average 5.3 hectares

Five year average 7.8 hectares

B = 27 hectares

Comments from consultation exercise and meeting (May 2007)

Chatterley Valley remains a RIS. Significant employment development could take development out of the conurbation.

Allowance for small sites

0.175 hectares per annum x = 0.875 hectares.

C = 28 hectares

Current policies

120 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 28 hectares

Regionally significant sites/Cross boundary issues

Chatterley Valley RIS - 10 hectare supply

E = 28 hectares

Other issues including relationship to housing

Population mid-year 2004 (16 yrs +) 101,000

Indicative longer-term requirement per 10,000 population = 8.32 hectares

Net working baseline 2006 - 2026 = 5700 dwellings

Indicative longer-term requirement per 1000 dwellings = 14.73 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

County Council commented that there is a need to ensure correct balance of employment land provision with Stoke to support renaissance of MUA's.

F = 28 hectares

Indicative longer term requirements

 $E \times 3 = 84$ hectares indicative longer term requirements

(2006 RELS supply 92 hectares)

Final comments from Prosperity for All Lead Officer

No reduction for RIS – only relatively small commitment. Some increase to reflect recent scale of development.

A1.22 South Staffordshire

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 16 hectares

5/10 year average completion rates

Ten year average 2.6 hectares

Five year average 1.3 hectares

B = 8 hectares

Comments from consultation exercise and meeting (May 2007)

Need to ensure a close link to housing growth.

Allowance for small sites

0.343 hectares per annum x = 1.71 hectares.

C = 10 hectares

Current policies

60 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 10 hectares

Regionally significant sites/Cross boundary issues

Wobaston Road RIS & MIS (85 hectares) and Hilton Cross RIS (6.73 hectares)

E = 8 hectares

Relationship to housing and other issues

Population mid-year 2004 (16 yrs +) 86,000

Indicative longer-term requirement per 10,000 population = 2.79 hectares

Net working baseline 2006 - 2026 = 3500 dwellings

Indicative longer-term requirement per 1000 dwellings = 6.85 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

County Council commented that there is a need to ensure employment land provision does not undermine Black Country regeneration. Significant application for employment/warehousing development at Four Ashes.

Further comments received from County Council -

South Staffs are much more comfortable with the figures included for S Staffs in the papers circulated last week. This is of course with the caveat that you have always included that these are indicative figures to be tested through detailed analysis through the LDF process.

F = 8 hectares

Indicative longer term requirements

- F x 3 = 24 hectares indicative longer term requirements
- (2006 RELS 34 ha supply hectares)

Final comments from Prosperity for All Lead Officer

Supply adjusted to take account of strategic site allocations (existing and potential) within South Staffordshire District.

A1.23 Stafford

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 28 hectares

5/10 year average completion rates

Ten year average 5.9 hectares

Five year average 7 hectares

B = 35 hectares

Comments from consultation exercise and meeting (May 2007)

Aspiration for 10 hectares of employment development per year. Stafford Borough was the worst performing West Midlands District in relation to employment change in the period 1998-2003. Recently has been reasonably successful in attracting new employment growth due to having the right sites to offer to incoming investment. Stafford is also proposed for considerable housing growth.

Allowance for small sites

1.3 hectares per annum x 5 = 6.5 hectares.

C = 40 hectares

Current policies

150 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 40 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 40 hectares

Relationship to housing and other issues

Population mid-year 2004 (16 yrs +) 101,000

Indicative longer-term requirement per 10,000 population = 11.8 hectares

Net working baseline 2006 - 2026 = 10,100 dwellings

Indicative longer-term requirement per 1000 dwellings = 11.88 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

Stafford are happy with the revised figures due to reasons given in previous meeting. Development would be mainly concentrated around Stafford.

Further comments subsequently received (October 2007) that Stafford and South Staffordshire should be identified in table PA6A as authorities where cross boundary issues are to be resolved. This would be related to the growth of Stafford town and would follow the approach in the housing policies.

Response from Prosperity for All Lead Officer (October 2007)

Do not support suggested change in relation to cross boundary discussions. There are three principal reasons for not supporting this change at this stage:

1. Two meetings were held with the County Council and Staffordshire Disticts during development of the employment land policies. At neither of these meetings did the Stafford/ S Staffordshire issue get raised although cross boundary matters were specifically discussed.

2. The Prosperity for All Lead Officer's interpretation of the land supply and geography is that to accede to Stafford's request would probably lead to the identification of very attractive development opportunity close to the M6 motorway. The risk would be mitigate against the development of possibly less attractive existing sites elsewhere within Stafford District itself. Such a development opportunity could also divert economic investment away from the North Staffordshire MUA, a matter which could be considered as contrary to the spatial strategy.

3. The fact that the suggestion has not been discussed and agreed as being either desirable or necessary with either South Staffordshire District Council or the County Council. There is a requirement for consultation with these authorities during the preparation of Core Strategies so if a compelling case is made to identify employment land 'across the boundary' to meet Stafford's needs then there is still the chance to pursue in this manner.

F = 40 hectares

Indicative longer term requirements

F x 3 = 120 hectares indicative longer term requirements

(2006 RELS supply 110 hectares)

Final comments from Prosperity for All Lead Officer

Stafford is identified as a local regeneration area and recent closures and job losses indicate a need for continuing level of development, but since the overriding imperative is to secure regeneration in the N Staffordshire conurbation the proposed five-year allocation does not extend as far as suggested by the District Council (10 hectares per annum).

A1.24 Staffordshire Moorlands

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 6 hectares

5/10 year average completion rates

Ten year average 1.1 hectares

Five year average 1.3 hectares

B = 6 hectares

Comments from consultation exercise and meeting (May 2007)

Happy with figures in the spatial options.

Allowance for small sites

0.037 hectares per annum x 5 = 0.18 hectares.

C = 6 hectares

Current policies

40 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 6 hectares

Regionally significant sites/Cross boundary issues

Blythe Vale RIS 50 hectare supply.

E = 6 hectares

Relationship to housing and other issues

Population mid-year 2004 (16 yrs +) 77,600

Indicative longer-term requirement per 10,000 population = 2.3 hectares

Net working baseline 2006 - 2026 = 6,000 dwellings

Indicative longer-term requirement per 1000 dwellings = 3 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

Staffordshire Moorlands do not have an issue with the proposed figures. Staffordshire Moorlands Employment Land Study does support an overall requirement of around 18 ha of employment land to 2021. Blythe Bridge site is meeting wider strategic needs and therefore should not count towards the 'local' requirement of employment land provision, whether in the Structure Plan or the RSS. The site also adjoins Stafford BC and could therefore affect their needs as well as those of Stoke and Newcastle. Sites such as this are additional to the requirements of each District. The RSS should provide some clarity on the role of strategic sites such as this.

Response from Prosperity for All Lead Officer

Agree that Regionally Significant Sites are in addition to local requirements. Error had been made including Blythe Bridge in supply figures. Now amended to reflect this.

F = 6 hectares

Indicative longer term requirements

- F x 3 = 18 hectares indicative longer term requirements
- (2006 RELS supply 52 hectares)

Final comments from Prosperity for All Lead Officer

Given rural nature and proximity to North Staffs conurbation no pressing need to increase provision.

A1.25 Tamworth

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 22 hectares

5/10 year average completion rates

Ten year average 2.9 hectares

Five year average 2.8 hectares

B = 13 hectares

Comments from consultation exercise and meeting (May 2007)

Cross boundary issues. Tamworth has limited capacity for employment growth.

Allowance for small sites

0.083 hectares per annum x 5 = 0.41 hectares.

C = 14 hectares

Current policies

120 hectares of employment land 1996 – 2011 - Staffordshire and Stoke on Trent Structure Plan 1996-2011

D = 14 hectares

Regionally significant sites/Cross boundary issues

Limited capacity to accommodate further development within Tamworth District. Scope to upgrade nearby Birch Coppice development to a RLS. This could help address Tamworth's needs. Further discussion to clarify crossboundary dimension required.

E = 14 hectares

Relationship to housing and other issues

Population mid-year 2004 (16 yrs +) 58,100

Indicative longer-term requirement per 10,000 population = 7.22 hectares

Net working baseline 2006 - 2026 = 2,900 dwellings

Indicative longer-term requirement per 1000 dwellings = 14.48 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

Tamworth has a limited supply of employment land beyond those opportunities already identified and recycling opportunities are also constrained, although there is likely to be some redevelopment opportunities on under-performing estates. Further growth would involve joint working with adjoining authorities. There is a need to ensure consistency with housing and policy CF3.

Subsequent comments from Tamworth Borough Council (received via Staffordshire County Council September 2007)

The figure for Tamworth is not based on sound evidence. It appears that the current RSS process is to best guess what might be required which does not give me much confidence in moving forward with our Core Strategy work and general conformity with the RSS. Also concerned over the attitude that North Warwickshire should not be considered to support future employment needs for Tamworth. Any figures in the RSS will need to have supporting text that makes it clear that the figures being used are subject to change as evidence is gathered to support Core Strategies.

Response from Prosperity for all Lead Officer

The figures for Tamworth reflect the approach used to calculate employment land requirement and no evidence has been provided from the District to suggest that alternative figures should be used. There is also no evidence that cross-boundary provision is needed to meet employment land requirements.

F = 14 hectares

Indicative longer term requirements

 $F \times 3 = 42$ hectares indicative longer-term requirements

(2006 RELS supply 33 hectares)

Final comments from Prosperity for All Lead Officer

Need to ensure consistency with housing on cross boundary issues.

Warwickshire

A1.26 North Warwickshire

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 43 hectares

5/10 year average completion rates

Ten year average 11.9 hectares

Five year average 20.9 hectares

B = 30 hectares – subject to checking. N Warks is a special case because some important sites contributing to the past rates of take-up are special or one-offs. Coleshill Hall Hospital and Birch Coppice are the examples. The former is redevelopment within Green Belt and the latter has potential as a future RLS. It is important there is no double-counting and the continuing availability of land in sub-regional/ regional sites must be taken into account.

Consultation comments and meeting (May 2007)

Warwickshire County Council commented that the mechanism of a rolling reservoir of available employment land should is supported but a 5-10 year time-frame would be preferable to just 5 years because it would allow for a wider choice of different sites covering a range of qualities to cater for a changing sector requirements. This will be particularly important in taking onboard the output of the RES Review.

C = 30 hectares

Allowance for small sites

No data provided.

D = 30 hectares

Current policies

The Warwickshire Structure Plan 1996-2011 identifies an 81 hectare land requirement for the period 1996-2011 with no additional land being released in North Warwickshire. The Plan recognizes that supply within the County is heavily skewed in favor of North Warwickshire, as a result of Hams Hall and Birch Coppice.

D = 30 hectares

Regionally significant sites/Cross boundary issues

RLS at Hams Hall remaining supply is 26.55 hectares.

E = 30 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 50,300

Indicative longer-term requirement per 10,000 population = 17.89 hectares

Net working baseline 2006 - 2026 = 3,000 dwellings

Indicative longer-term requirement per 1000 dwellings = 30 hectares (based on E x 3)

Comments from Warwickshire County Council (September and October 2007)

The North Warwickshire figure should be noted as including the de facto RLS at Birch Coppice - noting that this reduces the need for any further RLS expansion in the CSW Sub-region. A balance of 11 ha would be more in keeping with the level of housing growth (i.e. an average of 750 dwellings over 5 years). North Warwickshire also agree with this change and their Economic Development Department believe that this is a more appropriate employment land figure.

Response from Prosperity for All Lead Officer

The provision set out already excluded Birch Coppice from the five-year requirement but based on the comments above the change is agreed.

F = 11 hectares

Indicative longer term requirements

F x 3 = 33 hectares indicative longer term requirements

(2006 RELS supply 161 hectares)

Final comments from Prosperity for All Lead Officer

Limited potential for expansion at Hams Hall and proposal to extend and upgrade Birch Coppice as a RLS allowed for by proposed revision to Policy PA 9.

A1.27 Nuneaton and Bedworth

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 42 hectares

5/10 year average completion rates

Ten year average 7.8 hectares

Five year average 13.4 hectares

B = 40 hectares – existing supply appears constrained.

Consultation comments and meeting (May 2007)

Warwickshire County Council commented that the mechanism of a rolling reservoir of available employment land should is supported but a 5-10 year time-frame would be preferable to just 5 years because it would allow for a wider choice of different sites covering a range of qualities to cater for a changing sector requirements. This will be particularly important in taking onboard the output of the RES Review.

C = 40 hectares

Allowance for small sites

0.383 hectares over the last 5 years.

D = 42 hectares

Current policies

The Warwickshire Structure Plan 1996-2011 identifies a 132 hectare land requirement for the period 1996-2011 with 21 hectares of additional land being released in Nuneaton and Bedworth.

D = 42 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 32 hectares – reduced on the knowledge of emerging proposed RIS within this District.

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 95,700

Indicative longer-term requirement per 10,000 population = 10.03 hectares

Net working baseline 2006 - 2026 = 10,800 dwellings

Indicative longer-term requirement per 1000 dwellings = 8.88 hectares (based on F x 3)

Comments from Warwickshire County Council and Nuneaton and Bedworth Council (September and October 2007)

The Nuneaton & Bedworth BC figure should be annotated to the effect that an additional RIS of 25-50 ha is included in the figure quoted. However, this suggestion was not agreed by Nuneaton and Bedworth who commented that the figures shown in the table for the five-year reservoir were needed irrespective of what happens to RIS.

Response from Prosperity for All Lead Officer

The provision already set out does not include the potential RIS. In light of comments from Nuneaton and Bedworth no changes are required.

F = 32

Indicative longer term requirements

 $F \times 3 = 96$ hectares indicative longer term requirements

(2006 RELS supply 57 hectares)

Final comments from Prosperity for All Lead Officer

Given existing supply, the proposed level of provision feels high, even though it has been constrained.

A1.28 Rugby

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 33 hectares

5/10 year average completion rates

Ten year average 6.4 hectares

Five year average 7.9 hectares

B = 33 hectares – this does not allow for any land on the periphery of the built-up area of Coventry to serve Coventry's needs.

Consultation comments and meeting (May 2007)

Rugby Borough Council commented that the employment land requirements do not relate to housing growth. Warwickshire County Council commented that the mechanism of a rolling reservoir of available employment land should is supported but a 5-10 year time-frame would be preferable to just 5 years because it would allow for a wider choice of different sites covering a range of qualities to cater for a changing sector requirements. This will be particularly important in taking on-board the output of the RES Review.

C = 33 hectares

Allowance for small sites

0.72 hectares over period 1996-2006

D = 36 hectares

Current policies

The Warwickshire Structure Plan 1996-2011 identifies a 144-hectare land requirement for the period 1996-2011 with 11 hectares of additional land being released in Rugby.

D = 36 hectares

Regionally significant sites/Cross boundary issues

Ansty Park MIS – 40.03 hectares land supply

E = 36 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 72,000

Indicative longer-term requirement per 10,000 population = 15 hectares

Net working baseline 2006 - 2026 = 10,800 dwellings

Indicative longer-term requirement per 1000 dwellings = 10 hectares (based on F x 3)

Comments from Warwickshire County Council (September and October 2007)

The Rugby BC figure looks about right in relation to the scale of housing growth but should be annotated to make it clear that Ansty is included in these figures. (NB. The reference to the former Peugeot Site contributing to Coventry's employment needs is both presumptive and overly prescriptive and should be deleted i.e. proximity to Coventry will be taken into account at the LDF stage.)

Response from Prosperity for All Lead Officer

The Ansty RIS would be additional to the Rugby figure. Removing it (40 ha) would reduce the five-year requirement to 23 hectares.

Further comments from Warwickshire County Council (October 2007)

The Rugby figure should be kept at 36 ha to be consistent with the level of housing growth.

F = 36 hectares excluding Ansty

Indicative longer term requirements

E x 3 = 108 hectares indicative longer term requirements

(2006 RELS supply 35 hectares)

Final comments from Prosperity for All Lead Officer

The potential redevelopment of the former Ryton car plant is a significant additional potential site not included at the time of the 2006 RELS survey.

A1.29 Stratford-on Avon

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 37 hectares

5/10 year average completion rates

Ten year average 7.8 hectares

Five year average 8.8 hectares

B = 39 hectares

Consultation comments and meeting (May 2007)

The overall amount of employment land provision in Stratford has already exceeded the Structure Plan target to 2011 by 60% due to major development at Gaydon Proving Ground with 45 hectares built or available since 1996. This development was justified in terms of national and regional interest and it would be inappropriate to include such exceptions to the longer term requirements. Excluding Gaydon the total amount of employment land developed between 1995-2004 is 44.2 hectares at an average of 4.4 hectares per annum.

Warwickshire County Council commented that the mechanism of a rolling reservoir of available employment land should is supported but a 5-10 year time-frame would be preferable to just 5 years because it would allow for a wider choice of different sites covering a range of qualities to cater for a changing sector requirements. This will be particularly important in taking onboard the output of the RES Review.

C = 22 hectares

Allowance for small sites

No data provided.

D = 22 hectares

Current policies

The Warwickshire Structure Plan 1996-2011 identifies an 81 hectare land requirement for the period 1996-2011 with 23 hectares of additional land being released in Stratford-on-Avon.

D = 22 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 22 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 95,600

Indicative longer-term requirement per 10,000 population = 6.9 hectares

Net working baseline 2006 - 2026 = 5,600 dwellings

Indicative longer-term requirement per 1000 dwellings = 11.78 hectares (based on E x 3)

Comments from Warwickshire County Council (September and October 2007)

The Stratford-on-Avon DC figures look too high - perhaps by 5 ha - in relation to the scale of housing growth agreed and the surplus should be allocated to Rugby town. The figure should be reduced to 17 ha. We are not proposing cross boundary provision. However, the CSW Development Strategy (produced by the CSW Forum) gives the role to Rugby of taking growth (housing & employment) over and above local needs that arise in Stratford-on-Avon and N. Warks (i.e. outside the Sub-regions MUAs and Settlements of Significant Development).

Response from Prosperity for All Lead Officer

Agree to reduce figure to 17 hectares and identify Stratford and Rugby as areas where cross boundary issues need to be resolved.

F = 17 hectares

Indicative longer term requirements

 $F \times 3 = 51$ hectares indicative longer term requirements

(2006 RELS supply 57 hectares)

A1.30 Warwick

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 29 hectares

5/10 year average completion rates

Ten year average 5.9 hectares

Five year average 6.7 hectares

B = 30 hectares

Consultation comments and meeting

Warwick District commented that the figures are a slightly high and could be reduced.

Warwickshire County Council commented that the mechanism of a rolling reservoir of available employment land should is supported but a 5-10 year time-frame would be preferable to just 5 years because it would allow for a wider choice of different sites covering a range of qualities to cater for a changing sector requirements. This will be particularly important in taking onboard the output of the RES Review.

C = **25 hectares** – responding to comments

Allowance for small sites

No data provided.

D = 25 hectares

Current policies

The Warwickshire Structure Plan 1996-2011 identifies a 132 hectare land requirement for the period 1996-2011 with 33 hectares of additional land being released in Warwick.

D = 25 hectares

Regionally significant sites/Cross boundary issues

None identified.

E = 25 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 113,000

Indicative longer-term requirement per 10,000 population = 6.63 hectares

Net working baseline 2006 - 2026 = 10,800 dwellings

Indicative longer-term requirement per 1000 dwellings = 6.9 hectares (based on E x 3)

Comments from Warwickshire County Council (September and October 2007)

The Warwick DC figure looks about right but should include a 50% share of the Warwick University Expansion.

Response from Prosperity for All Lead Officer

Agree to increase figure and include reference to Warwick University.

F = 30 hectares (inc. 50% share of Warwick Un. expansion)

Indicative longer term requirements

F x 3 = 90 hectares indicative longer term requirements

(2006 RELS supply 56 hectares)

<u>Worcestershire</u>

A1.31 Bromsgrove

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 18 hectares

5/10 year average completion rates

Ten year average 4.5 hectares

Five year average 4.2 hectares

B = 22 hectares

Consultation comments and meeting (May 2007)

The figures for Bromsgrove are too high. There appears to be no correlation with the provision identified in surrounding Districts, and no obvious link with the housing options. For this level of employment land to be provided substantial amounts of Greenfield release may be needed.

See comments from Worcestershire County Council A1.37.

C = 10 hectares

Allowance for small sites

Completions 1996 – 2006 = 4.97, average of 0.40 hectares per annum

D = 12 hectares

Current policies

The County Structure Plan requires the District Council to provide at least 75 hectares [185.3 acres] of employment land up to 2001. This is a District-wide allocation. A distinction exists, nonetheless, between meeting some of the employment land needs of Redditch (a maximum of 30 hectares [74 acres]) and those of Bromsgrove District generally (at least 45 hectares [111 acres]).

E = 15 hectares

Regionally significant sites/Cross boundary issues

Meeting the needs of Redditch.

F = 15 hectares – Needs of Redditch are now include in Redditch figures

Other issues including relationship to housing -

Population mid-year 2004 (16 yrs +) 73,400

Indicative longer-term requirement per 10,000 population = 6.13 hectares

Net working baseline 2006 - 2026 = 2100 dwellings

Indicative longer-term requirement per 1000 dwellings = 21.42 hectares (based on F x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

The figures for Bromsgrove are too high and need to reflect the latest housing figures.

G = 7

Indicative longer term requirements

 $G \times 3 = 21$ hectares indicative longer term requirements

(2006 RELS supply 36 hectares)

A1.32 Malvern Hills

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 9 hectares

5/10 year average completion rates

Ten year average 2.6 hectares

Five year average 2.2 hectares

B = 11 hectares

Consultation comments and meeting (May 2007)

The figures for Malvern seem about right. However, concern over reliance on trend based approach. There is a need to link employment land provision with housing growth. The County Council method could continue as the basis for calculating employment land provision. The South Worcestershire Authorities believe that a maximum figure would be appropriate for areas beyond the MUAs.

See comments from Worcestershire County Council A1.37.

C = 11 hectares

Allowance for small sites

0.8 hectares per annum

D = 15 hectares

Current policies

About 55 hectares of employment land is required in Malvern Hills between 1996 and 2011 in the Worcestershire County Structure Plan.

E = 15 hectares

Regionally significant sites/Cross boundary issues

None identified.

F = 15 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 60,700

Indicative longer-term requirement per 10,000 population = 7.41 hectares

Net working baseline 2006 - 2026 = 4900 dwellings

Indicative longer-term requirement per 1000 dwellings = 9.18 hectares (based on F x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

The figures for Malvern seem about right.

G = 11 hectares

Indicative longer term requirements

G x 3 = 33 hectares indicative longer-term requirements

(2006 RELS supply 19 hectares)

A1.33 Redditch

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 7 hectares

5/10 year average completion rates

Ten year average 1.7 hectares

Five year average 1.1 hectares

B = 7 hectares

Consultation comments and meeting (May 2007)

Disagree with principle of minimum reservoir. Need to balance housing and employment land allocations. Approach being proposed could result in a significant shortfall of employment land allocations as compared to likely housing targets. Would like to see employment land allocated for the whole plan period. For all Districts the figure's should be minima not maxima. The WCC employment land methodology would imply that 189 hectares of employment land is needed under the housing option 3. Meeting this requirement would involve Green Belt development.

Redditch urban area abuts its administrative area on three sides and a study with other districts would need to be undertaken to identify locations for development for both employment and residential purposes. It is believed that a further area of approximately 15 hectares could be developed around Ravensbank within the administrative area of Bromsgrove District Council.

See comments from Worcestershire County Council A1.37.

C = 7 hectares

Allowance for small sites

1.44 hectares average per annum over ten years 1996 – 2006.

D = 9 hectares

Current policies

About 65 hectares of employment land to meet the needs of Redditch between 1996 and 2011, some of which is to be provided in Bromsgrove (Worcestershire County Structure Plan).

E = 9 hectares

Regionally significant sites/Cross boundary issues

See above.

F = 9 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 63,100

Indicative longer-term requirement per 10,000 population = 4.27 hectares

Net working baseline 2006 - 2026 = 6600 (of which 3300 to be provided in Redditch and 3300 adjacent to the Town within the surrounding Districts of Bromsgrove and Stratford) dwellings

(7,300 dwellings of Bromsgrove and Redditch total to be provided in and around Redditch Town)

Indicative longer-term requirement per 1000 dwellings = 4.09 hectares (based on F x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

There is a need to increase employment land provision in Redditch to ensure consistency with increased housing provision. Some of this development will need to be accommodated in Bromsgrove and possibly Stratford.

G = 17*

* of which 8 hectares will be provided within Bromsgrove or Stratford

Indicative longer term requirements

G x $3 = 51^*$ hectares indicative longer term requirements * of which 24 hectares will be provided within Bromsgrove or Stratford

(2006 RELS supply 18 hectares)

A1.34 Worcester City

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 13 hectares

5/10 year average completion rates

Ten year average 1.7 hectares

Five year average 1.5 hectares

B = 9 hectares

Consultation comments and meeting (May 2007)

Concern over reliance on trend based approach. There is a need to link employment land provision with housing growth. The County Council method could continue as the basis for calculating employment land provision. The South Worcestershire Authorities believe that a maximum figure would be appropriate for areas beyond the MUAs. The figures for Worcester City seem too low.

See comments from Worcestershire County Council A1.37.

C = 18 hectares – reflecting current supply and status of Worcester as a Settlement of Significant Development. Be difficult to justify land across administrative boundary without full take-up of capacity within the town itself.

Allowance for small sites

0.22 hectares per annum.

D = 19 hectares

Current policies

About 75 hectares of employment land is required in Worcester City between 1996 and 2011 as identified in the Worcestershire County Structure Plan.

E = 19 hectares

Regionally significant sites/Cross boundary issues

Yes. Potential for cross boundary expansion. Land provided in Wychavon could potentially meet the needs of Worcester.

F = 19 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 75,200

Indicative longer-term requirement per 10,000 population = 7.57 hectares

Net working baseline 2006 - 2026 = 10,500 dwellings (of which 3200 to be provided in Worcester City and 7300 adjacent to the City within the surrounding Districts of Malvern and Wychavon)

Indicative longer-term requirement per 1000 dwellings = 5.42 hectares (based on F x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

The figures for Worcester need to increase to reflect significant housing growth.

G = 27*

* of which 9 hectares will be met within Malvern Hills or Wychavon the exact balance too be tested and determined though the preparation of a joint Core Strategy.

Indicative longer term requirements

 $G \ge 3 = 81^*$ hectares indicative longer term requirements * of which 27 hectares to be met within Malvern Hills and Wychavon the exact balance to be determined through the preparation of a joint Core Strategy.

(2006 RELS supply 54 hectares)

A1.35 Wychavon

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 22 hectares

5/10 year average completion rates

Ten year average 5.1 hectares

Five year average 4.5 hectares

B = 22 hectares

Consultation comments and meeting (May 2007)

Concern over reliance on trend based approach. There is a need to link employment land provision with housing growth. The County Council method could continue as the basis for calculating employment land provision. The South Worcestershire Authorities believe that a maximum figure would be appropriate for areas beyond the MUAs. For figures for Wychavon seem about right.

See comments from Worcestershire County Council A1.37.

C = 22 hectares

Allowance for small sites

1996 – 2006 = 2.76 hectares or 0.27 hectares per annum

D = 23 hectares

Current policies

About 110 hectares of employment land is required in Wychavon between 1996 and 2011 as identified in the Worcestershire County Structure Plan.

E = 23 hectares

Regionally significant sites/Cross boundary issues

Expansion of Worcester. See above.

F = 23 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 94,500

Indicative longer-term requirement per 10,000 population = 7.30 hectares

Net working baseline 2006 – 2026 = 9100 dwellings

Indicative longer-term requirement per 1000 dwellings = 7.58 hectares (based on F x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

Wychavon did not attend the final meeting but the County Council felt that the figures for seemed ok and reflected the regional averages.

G = 23

Indicative longer term requirements

 $G \times 3 = 69$ hectares indicative longer term requirements

(2006 RELS supply 49 hectares)

A1.36 Wyre Forest

A = Five year reservoir from Options Consultation Report based on 2.2% growth rate = 2 hectares

5/10 year average completion rates

Ten year average 0.4 hectares

Five year average 0.3 hectares

B = 2 hectares

Consultation comments and meeting (May 2007)

Concern over reliance on trend based approach. There is a need to link employment land provision with housing growth. The County Council method could continue as the basis for calculating employment land provision. The South Worcestershire Authorities believe that a maximum figure would be appropriate for areas beyond the MUAs. The figures for Wyre Forest are low.

See comments from Worcestershire County Council A1.37.

C = 10 hectares – takes account of very low past rates of completion as well as potential future supply.

Allowance for small sites

1996 - 2006 = 8.59 ha (0.86 hectares per annum)

D = 14 hectares

Current policies

About 45 hectares of employment land is required in Wyre Forest between 1996 and 2011 as identified in the Worcestershire County Structure Plan.

E = 14 hectares

Regionally significant sites/Cross boundary issues

None identified.

F = 14 hectares

Relationship to housing and other issues -

Population mid-year 2004 (16 yrs +) 80,400

Indicative longer-term requirement per 10,000 population = 5.22 hectares

Net working baseline 2006 – 2026 = 3400 dwellings

Indicative longer-term requirement per 1000 dwellings = 12.35 hectares (based on E x 3)

Comments following final round of meetings with Counties/Districts (September 2007)

The figures for Wyre Forest seem too high and there is a need for a slight reduction.

G = 11

Indicative longer term requirements

 $G \times 3 = 33$ hectares indicative longer term requirements

(2006 RELS supply 45 hectares)

A1.37 Comments from Worcestershire County Council to Spatial Options Consultation

Need to balance housing needs with appropriate level of employment land. The County expressed concern that the reservoir approach may prejudice the ability of Districts to offer a balanced portfolio of sites. They also oppose the use of maximum figures in the Shire's. The County has commissioned work by GVA Grimley to explore the employment needs of Worcestershire at both a sub-regional and District level for each housing option. The County also refers to its own method of 1 hectare of employment land for every 70 dwellings. There is potential for a joint Core Strategy to be prepared for the South Worcestershire Districts.

Second round of meetings (September 2007)

Officers from Worcestershire County Council also attended the meetings in September 2007 and their views were taken into account in the individual District analysis.

APPENDIX 2: Adjusted Employment Land Requirements Final Table

	Indicative readily available 5 year reservoir	Indicative longer term requirements (ha)	Population mid year 2004 (16+)	Indicative longer term per 10,000 population	Claimants unemployed Jul-07	Indicative longer term requirements per 100	Housing requirement Net Working Baseline 2006-2026	Indicative longer requirement per
	figure (ha)	2006-2026				unemployed		1000 dwellings
Birmingham	130	390	768,000	5.07	34,156	1.14	50,600	7.70
Black Country	185	555	869,500	6.38	26731	2.07	61,200	9.06
Coventry	82	246	243,200	10.11	7,445	3.30	33,500	7.34
Solihull	15	45	159,700	2.81	2,558	1.75	7,600	5.92
Metropolitan Area	412	1236	2,040,400	6.06	70890	1.74	152,900	8.08
Herefordshire	37	111	144,700	7.67	1,405	7.9	16,600	6.68
Stoke-on-Trent	55	165	192,000	8.59	4,570	3.61	11,400	14.47
Telford & Wrekin	50	150	126,200	11.88	2,319	6.46	26,500	5.66
Bridgnorth	6	18	44,000	4.09	426	4.22	2,500	7.2
N Shropshire	22	66	47,600	13.86	533	12.38	6,100	10.81
Oswestry	8	24	31,000	7.74	410	5.85	4,000	6
Shrewsbury/Atcham	28	84	77,300	10.86	823	10.2	8,200	10.24
S Shropshire	8	24	34,500	6.95	286	8.39	4,900	4.89
Shropshire	72	216	234,400	9.22	2,478	8.71	25,700	8.4
Cannock Chase	28	84	73,900	11.36	1,121	7.49	5,800	14.48
East Staffordshire	50	150	84,300	17.79	986	15.21	12,900	11.62
Lichfield	33	99	76,700	12.9	699	14.1	8,000	12.37
Newcastle	28	84	101,000	8.32	1,331	6.31	5,700	14.73
South Staffordshire	8	24	86,000	2.79	1,004	2.39	3,500	6.85
Stafford	40	120	101,000	11.8	1,006	11.92	10,100	11.88
Stafford Moorlands	6	18	77,600	2.3	610	2.95	6,000	3
Tamworth	14	42	58,100	7.22	886	4.74	2,900	14.48

Staffordshire	207	621	658,600	9.43	7,643	8.12	54,900	11.31
N Warwickshire Nuneaton &	11	33	50,300	6.56	619	5.33	3,000	11
Bedworth	32	96	95,700	10.03	1,931	4.97	10,800	8.88
Rugby	36	108	72,000	15	1,035	10.43	10,800	10
Stratford	17	51	95,600	5.33	841	6.06	5,600	9.10
Warwick	30	90	113,000	7.96	1,297	6.93	10,800	8.33
Warwickshire	126	378	426,600	8.86	5,723	6.60	41,000	9.21
Bromsgrove	7	21	73,400	2.86	981	2.14	2,100	10
Malvern Hills	11	33	60,700	5.43	507	6.5	4,900	6.73
Redditch	17 of which 8 hectares will be provided within Bromsgrove or Stratford	51 of which 24 hectares will be provided within Bromsgrove or Stratford	63,100	8.08	1,131	4.50	6,600	7.72
Worcester	27 of which 9 hectares will be provided within Malvern Hills and Wychavon the exact balance to be determined through the preparation of a joint Core Strategy.	81 of which 27 hectares will be provided within Malvern Hills and Wychavon the exact balance to be determined through the	75,200	10.77	1,395	5.80	10,500	7.71

Wychavon	23	69	94,500	7.3	961	7.18	9,100	7.58
Wyre Forest	11	33	80,400	4.10	1,093	3.01	3,400	9.70
Worcestershire	96	288	447,300	6.44	6,068	4.74	36,600	7.86
West Midlands	1055	3165	4,270,200	7.41	101,096	3.13	365,600	8.65

MUA	495	1485 (47%)
Non-MUA	560	1680 (53%)
Region	1055	3165