Employment Land Review update 2010

Borough of Redditch
Core Strategy
Background Document

28 June 2010

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Introduction

The Employment Land Review was adopted for consultation purposes on the 27th March 2009. This document represents an update to the Employment Land Review. There is a need to update the Employment Land Review for the following reasons:

- The introduction of Planning Policy Statement 4: Planning for Sustainable Economic Growth (adopted 29th December 2009) offers a new source of guidance for economic development in local authorities;
- The latest Phase 2 revisions on the West Midlands Regional Spatial Strategy (RSS) are beginning to emerge. An update to the Employment Land Review therefore offers the opportunity for the review to take account of the Panel Report[1] into the Phase Two Revision of the West Midlands RSS. The Panel Report proposes changes that are significantly different to the version of the RSS that were previously considered in, and informed, the Employment Land Review;
- There were some minor errors in the stage 3 report in terms of the figures that were reported, the update offers the opportunity to bring the figures up to date;
- Several sites which had planning permission during the completion of the Employment Land Review have since seen their permissions expire. There is a need to re-assess these sites to identify whether or not they are still suitable for employment purposes;
- It is also considered necessary to assess other sites which were not assessed in the original Employment Land Review to identify whether or not they are suitable for employment purposes.

This update to the Employment Land Review seeks to take account of the changing circumstances outlined above and to effect the changes brought about these circumstances. In doing so, this update recommends a portfolio of local employment sites to meet local and strategic planning objectives for the Borough.

[1] The report is formally entitled 'West Midlands Regional Spatial Strategy Phase Two Revision Report of the Panel: Volume 1 – Report, September 2009.

PPS 4: Planning for Sustainable Economic Growth (2009)

The publication of PPS 4 came after the completion of the previous Employment Land Review, therefore when considering all of the employment sites it is necessary to consider the policies in the new PPS to ensure that sites do not conflict with any of its requirements.

There are numerous key points arising from PPS 4 that have an impact upon this update. The detail below highlights key issues that have been considered as part of this update.

PPS 4 - Policy EC1: Using Evidence to Plan Positively

"At the local level, the evidence base should:

a. *be informed by regional assessments;*
b. *assess the detailed need for floorspace for economic development, including for all main town centre uses over the plan period; …*
d. *assess the existing and future supply of land available for economic development are reassessed against the policies in this PPS, particularly if they are for single or restricted uses. Where possible, any reviews of land available for economic development should be undertaken at the same time as, or combined with, strategic housing land availability assessments"*

The above extract details the relevant requirements of PPS 4 Policy EC1. In relation to point a. the Employment Land Review process has taken account of the requirements of the emerging RSS. In relation to point b. stage 2 of the Employment Land Review provided a set of forecasts, the Panel Report into the RSS has since been published and the figure for the Borough increased. In relation to point d. the aims of this current update fit the remit of the policy.

PPS 4 - Policy EC2: Planning for Sustainable Economic Growth

"Regional planning bodies and local planning authorities should ensure that their development plan:

b. supports existing business sectors, taking account of whether they are expanding or contracting and, and where possible, identifies and plans for new or emerging sectors likely to locate in their area, such as those

producing low carbon goods or services. However, policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances.
d. seeks to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use and, subject to the specific policy requirements of this PPS for town centres, reflects the different location requirements of businesses, such as the size of site requires, site quality, access and proximity to markets, as well as the locally available workforce.
e. identifies, protects and promotes key distribution networks, and locates or co-locates developments which generate substantial transport movements in locations that are accessible (including by rail and water transport where feasible), avoiding congestion and preserving local amenity as far as possible.
h. at the local level, where necessary to safeguard land from other uses, identifies a range of sites, to facilitate a broad range of economic development, including mixed use. Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained, and wider economic uses or alternative uses should be considered

The above extract details the relevant requirements of PPS 4 policy EC2. In relation to point b. the Employment Land Review carried out consultation with the business community that identified the current and future status of businesses with questions specifically relating to expectations of involvement in new activities and markets, growth prospects and employment creation. Core Strategy DPD policy would need to reflect this aspect of PPS4. In relation to point d. as part of the site assessments previously developed land is identified. In addition, the other issues listed in point d., such as access etc., are also addressed as part of the site assessment work. This approach would need to be reflected in Core Strategy policy. In relation to point e. strategic access and transport access issues are addressed as part of the site assessment process and would also need to be considered in Strategic Site Allocations in the Core Strategy for employment purposes and when allocating sites in the Site Allocations and Policies DPD. In relation to point h. the identification of sites is a key purpose of the Employment Land Review process. In terms of carrying forward existing site allocations, all existing allocations were reassessed as part of the Employment Land Review process to ensure they are still appropriate to be considered for employment purposes.

PPS 4 - Policy EC6: Planning for Economic Development in Rural Areas

"In rural area, local planning authorities should:

a. *strictly control economic development in open countryside away from existing settlements, or outside areas allocated for development in development plans"*

The above extract details the relevant requirements of PPS 4 Policy EC6. The location of potential employment sites were assessed against a criteria-based location requirement as part of the matrix assessment.

What level of employment land does Redditch Borough need to identify up to 2026?

The purpose of this section is to identify how the Employment Land target for the Borough of Redditch has been identified. At the time of writing the requirement for Employment land is **70.3ha**[2].

Stage 2 of the Employment Land Review

As part of the Employment Land Review, GVA Grimley in consultation with GHK Consulting undertook detailed demand forecasting for Redditch's economy and converted these forecasts of jobs into requirements for employment land. A number of scenarios were created which took into account national (Baseline), regional and local factors, as well as looking at past trends, to predict employment demand up to 2026.

Data was used from Cambridge Econometrics Local Economy Forecasting Model (LEFM) to undertake the analysis. The analysis demonstrated that, across all the scenarios, demand for employment land in manufacturing sectors is likely to fall during the period up to 2026. Specifically, the "Metal Goods", "Electronics, Electrical Engineering & Instruments" and "Mechanical Engineering" sectors are likely to see significant decreases in the demand for employment, and thus a fall in the demand for employment floorspace and land. Conversely, the tertiary sector, consisting of those entities that provide a service is likely to experience growth up to 2026. According to the analysis, a large proportion of this growth is expected to be in the "Retailing", "Land

[2] The West Midlands Regional Spatial Strategy identifies a target of 68ha, the completion of an Office Needs Assessment for Redditch town centre identified an additional need of 2.3ha outside of the town centre.

Transport", Other Business Services" and "Health & Social Work" sectors. This will result in an increase in the demand for employment floorspace and land required for these uses.

These changes in the economy represent, at the local level, the trends that are being experienced nationally with a shift away from manufacturing employment and a growing focus on the service sector. This shift has had, and will continue to have in the future, significant implications on the demand for different types, sizes and locations of employment land.

The analysis presented in stage 2 of the Employment Land Review showed that employment land requirements within Redditch were predicted to be in the range of 50ha to 83ha. The recommendation arising from these results was that the 'RSS based scenario' be used, and taken forward to stage 3 of the Employment Land Review. This scenario forecasted the need for 59ha of employment land up to 2026. This forecast was used as the basis for the work undertaken for stage 3 of the Employment Land Review.

Officers presented the findings of the Employment Land Review, which included the forecast of 59ha, to the Examination in Public (EIP) into the West Midlands RSS.

Emerging West Midlands Regional Spatial Strategy requirements

The West Midlands RSS Phase Two Revision (December 2007) identified an indicative long term requirement of 51ha[3] of employment land for the Borough up to 2026. This was inclusive of a rolling five-year reservoir of 17ha[4].

Since the completion of the Employment Land Review, an Examination into the West Midlands RSS Revision has been undertaken, and a Panel Report was published in September 2009. The recommendation within this report identifies an indicative long term requirement of 68ha[5] of employment land in the Borough. The rolling five year reservoir of 17ha[6] remained unchanged.

[3] Of which 24ha was proposed to be within Bromsgrove and/or Stratford.
[4] Of which 8ha was proposed to be within Bromsgrove and/or Stratford.
[5] Of which at least 12 ha will be provided within Stratford-on-Avon District west of the A435 and the balance remaining out of a total of up to 37 ha will be provided in Bromsgrove District at a location or locations to be agreed in the Core Strategies for Redditch and Bromsgrove Districts.
[6] The Panel report stated that "Of which 8ha will be provided within Stratford-on-Avon District west of the A435". It is assumed that this related to the first rolling reservoir period. To date Government Office for the West Midlands has yet to confirm whether or not this is the case.

Office Needs Assessment

Following completion of the Employment Land Review, an Office Needs Assessment was completed to specifically consider the requirement for, and supply of, office space in the Town Centre. The Assessment was completed jointly by Officers of the Council and GVA Grimley, in association with GHK Consulting. The purpose of the assessment was to:

- Test the office requirement set out in the West Midlands RSS (45, 000sq.m[7])
- Identify if there is an adequate supply of land in the town centre to cater for this requirement.

There were two key findings of the Office Needs Assessment that have a bearing on the Employment Land Review update.

Finding 1 – The Office requirement of 45, 000 sq.m in the Town Centre (recommended in the RSS Panel Report) is justifiably not appropriate to Redditch. It is suggested that, the requirement should be reduced to 30, 000 sq.m which is more in line with demand;

Finding 2 – The Town Centre and peripheral zone[8] can only accommodate around 22, 000sq.m of this requirement, and therefore the remaining 8000sq.m of office floorspace would have to be identified outside the town centre. As a result, this would increase the Employment Land Requirement for the Borough by a minimum of 2.3ha (This assumes an average building height of 3 storeys, a plot ratio of 40% and 3, 000sq.m per net hectare).

How much land needs to be identified?

- The RSS Panel report identifies a total requirement of 68ha for the Borough of Redditch;
- Of this 68ha:
    - 31ha should be provided within the Borough itself;
    - 12ha should be in Stratford-on-Avon District, adjacent to the Borough boundary;
    - A maximum of 25ha should be provided in Bromsgrove District, adjacent to the Borough boundary

[7] It should be noted that this requirement is a separate requirement relating solely to the Town Centre, and does not encompass any of the Employment Land requirement.
[8] This is based on the boundaries designated in Redditch Borough Council's Local Plan No.3

- Following on from the completion of the Office Needs Assessment an additional 2.3ha of Employment Land needs to be identified, specifically for Offices. If this is added to the 31ha, the total requirement increases to 33.3ha.

Site Appraisal Criteria and Matrix

As part of the Stage 3 Employment Land Review work a site appraisal criteria and matrix was developed in order to thoroughly assess all of the potential employment sites. In order to be consistent with this piece of work the same criteria and matrix that were used in stage 3 have been applied to the assessment of the additional sites that have been considered as part of this update.

In addition, the release of Planning Policy Statement 4 'Planning for Sustainable Economic Growth' states that Local Planning Authorities should "assess the existing and future supply of land available for economic development, ensuring that existing site allocations for economic development are reassessed against the policies in this PPS …" Therefore further work needs to be completed to ensure that both the allocations arising in Stage 3 of the Employment Land Review and the potential sites identified as part of this current update are assessed against PPS 4.

The subsections below set out the site appraisal criteria and matrix, as developed in stage 3 of the Employment Land Review and the additional assessment criteria arising from PPS 4.

Stage 3 of the Employment Land Review Criteria and Matrix

A site assessment sheet was developed as part of the stage 1 process of the Employment Land Review. The site assessment process was devised and carried out by planning services and Economic Development. The contents of the assessment sheet were derived from past experiences of assessing sites and guidance given in the Employment Land Review Guidance Note (2004). In addition to the site assessment form, a ranking system was developed, with the purpose of scoring sites on different features, and therefore identifying those sites which are more preferential for employment purposes. The ranking system took account of the emerging West Midlands RSS Policy PA6A 'Employment Land Provision', which states that '*Local Planning Authorities should make provision for a continuing five-year reservoir of readily available employment land outside town centres throughout the plan period'.* As a consequence of this policy, any potential employment sites that are identified to cater for the Borough 5 year reservoir of readily available land need to be readily available to come forward when required in the short term in order for Redditch Borough Council to be in conformity with Regional Planning Policy.

In addition to Policy PA6A, emerging West Midlands RSS Policy PA6B 'Protection of Employment Land and Premises' states:

Local Planning authorities, in conjunction with the relevant strategic authority and AWM, should regularly review existing employment land and the development pipeline within their area to establish (a) the continued suitability of sites for employment development and (b) to ensure the continuing supply of readily available and attractive sites. Such reviews will form an important part of the evidence base for Core Strategies. This assessment should take account of:

i) the physical suitability of the use of the land for employment purposes;

ii) a realistic assessment of the market attractiveness and viability of the site for employment purposes, irrespective of the attractiveness of the land for alternative, higher-value uses;

iii) whether the site is or can be served by high-quality public transport; and

iv) the potential contribution of the land to the level of employment land required over the plan period

As with Policy PA6A, this policy fed into the development of this site appraisal criteria and matrix which is used to score employment sites (the matrix and site appraisal criteria are interrelated), this was developed as part of the stage 3 Employment Land Review process.

The matrix is not an alternative way of making everyday planning decisions, and the criteria it uses are of course no substitute for the many considerations which influence such decisions, such as environmental and traffic impact, relationship to neighbouring uses and so forth. Rather, the matrix is a method for ranking sites (all of which are likely to meet ordinary planning criteria) in relation to a further set of criteria concerning issues specifically pertaining to employment land.

The matrix fundamentally looks at two key elements:

1. The Market: Is the site likely to be taken up for employment purposes?
2. The Policy: If the site is developed or redeveloped, what wider contribution will this make to meeting strategic policy?

Taking all considerations into account, the following matrix was developed as part of the stage 3 Employment Land Review process. An example of a completed matrix is set out in Appendix A.

Criteria Relevant to market demand (Industrial and Distribution):

1. **Market perception of site (Where 1 is low and 5 is high)**

This criterion is a judgement of how the market may perceive the site; in assessing this criterion the following indicators are applied:

Market interest in the site

This indicator looks at how either the site under consideration or neighbouring sites with similar characteristics are actually performing in the market. Where for instance there is evidence of strong take up and high interest then the site scores 5.

Adjacent sites do not demonstrate any levels of take-up – 1

Adjacent sites demonstrate an average level of take-up – 3

Adjacent sites demonstrate a high take-up rate – 5

2. **Local Market Conditions (Where 1 is low and 5 is high)**

a) Local balance of supply and demand for land

High scores under this indicator apply where there is an undersupply of serviced land and hence reasonable prospects for new development, subject of course to other key factors such as financial viability. The indicator is a judgement about current availability of serviced land and does not have regard to potential supply that may or may not become available. What the indicator acknowledges is that, in very general terms, sites will perform better where there is an undersupply rather than an oversupply of competing provision.

There is an oversupply of vacant employment units in close proximity, which would be comparable to the type of unit suited to the potential site – 1

There is provision of employment units in close proximity, which are not vacant, which would be comparable to the type of unit suited to the potential site – 5

3. **Local access and catchment (Where 1 is low and 5 is high)**

a) Catchment population served by public transport every 30 minutes (peak time services)

This indicator relates to labour availability and has particular relevance to footloose inward investment prospects. In broad terms, a location with a large labour pool will be more attractive than a location with a small catchment, although the extent to which there is competing interest for that labour will of course also have a bearing on the location's appeal. A site with a relatively large labour catchment scores more highly than a site with access to a much smaller labour market.

No bus service – 1

Site is not located in close proximity to a bus stop – 2

Site is located within 500m of a bus stop, with a service running less than every 30 minutes during peak times – 3

Site is located over 500m, but less than 1000m of a bus stop, with a service running every 30 minutes during peak times – 4

Site is located within 500m of a bus stop, with a service running every 30 minutes during peak times – 5

b) Easy local access especially for lorries

This is a judgement about the ease of access to a primary route. Poor linkage by minor roads or a route through congested built up areas will attract low scores. Conversely sites with good local highway networks to primary routes which can easily accommodate larger goods vehicles, heavy flows of traffic and faster travel will attract high scores.

Site is not in close proximity (1000m) to A road – 1

Site is in close proximity (1000m) to A road, but has to negotiate constrained network in order to access A road – 3

Site is in close proximity (1000m) to A road with no constraints, or site is located in an area which has been designed to accommodate HGVs - 5

4. **External environment (Where 1 is low and 5 is high)**

This judgement concerns compatibility or otherwise of neighbouring users, proximity to facilities and critical mass of similar uses in the surrounding area. For example, an isolated location with few other industrial developments either neighbouring or in close proximity and poor public transport provision would attract a low ranking. Conversely, sites located in, or close to, large established industrial areas can generally rely (although not always) on a steady flow of demand from local companies whose relocation requirements often necessitate a local solution given a need to retain key staff and to sustain the benefits of embedded networks.

Site is in an isolated position – 1

Site is adjacent to other industrial units – 5

Criteria Relevant to market demand (Offices):

The headline criteria for assessing sites for office developments are very similar to the criteria set out in respect of industrial/distribution sites, although qualitative judgements under these headings will differ to reflect the specific requirements of the office market.

The principal areas of difference are highlighted below:

1. **Internal Environment**

Key factors that are specifically relevant to the office market but only have limited bearing on industrial site assessment include quality of the public realm (soft and hard landscaping, signage, roads, street furniture); suitability of existing and proposed development in terms of nature of occupier and existing built form; evidence of master planning; adequacy of car parking. These factors are additional to those attributes mentioned above.

Surrounding location is considered to not be suited to office use e.g. poor public realm – 1

Surrounding location is considered to contain some elements which would be attractive to the office market – 3

Site is considered suitable for office use – 5

2. Strategic Access and Catchment

Although availability of broadband access is increasingly relevant to all employment categories, it has a special relevance to B1 office development and accordingly, our qualitative assessment of office sites includes this as a specific consideration.

No access to Broadband – 1

Broadband is in place – 5

All sites relevant to policy objectives

With respect to policy objectives, we have assessed sites according to two criteria, namely – their contribution to economic development policy objectives and secondly whether, and to what extent, the sites might be judged as environmentally sustainable. The indicators we have used to make these judgements are detailed below.

Environmental Sustainability and Economic Development:

Sites are scored highly according to the potential contribution they would make to job creation within acknowledged priority areas.

Quality Categories:

In addition to the criteria set out above, we have assessed sites according to:

- Availability or whether the site is affected by constraints which have to be removed before development can proceed.

The qualitative analysis of course has major limitations and should be used with caution. In deciding whether a site should be safeguarded for employment use, or brought forward for employment use, other factors will have bearing – for example, it will also depend on the quantitative balance of demand and supply, and on the prevailing quality profile. Thus in an area where employment land is in short supply overall, or where the quality of sites is generally low, it will be advisable to bring forward relatively poor sites, which in a more generously provided area would not be considered worthy (alternatively, depending on the circumstances, it may be preferable to look for new and better employment allocations).

More generally, it would be beyond the scope of this study to give definitive advice on specific policy or investment decisions.

It should be noted, that those sites that received low scores in the site assessment are not necessarily unsuitable for employment use, but based on the specific criteria of the assessment are shown to be less suitable for employment purposes in comparison to other sites assessed. It is possible that the sites that do not rank as highly as some of the other sites will be more suitable for employment purposes later during the plan period.

There is a need to develop a clear scoring system for assessing any known constraints. The scoring system is designed to cover as many possible constraints that can be identified at this stage. However, due to the level of site investigation, which can be considered to be preliminary, it is anticipated that not all constraints will have been identified. Indeed, future constraints may develop on each of the sites over time, and therefore, where sites are taken forward, further constraints to development may arise during the application stage.

When assessing any physical constraints on potential employment sites, comments were sought from Landscape services and Environmental Health in order to provide specialist advice on issues including:

- Contaminated Land;
- Biodiversity/Ecology;
- Tree Preservation Orders.

The comments received were detailed and it is considered necessary that if any of the sites were to be taken forward for development, comments should be sought by the developer/planning department from the above departments and any other necessary services.

In addition to the above services a number of studies have been undertaken as part of the preparation of the Council's Local Development Framework (LDF). These studies have also assisted in identifying constraints on the potential employment land sites. The studies include:

- Open Space Needs Assessment;
- Strategic Flood Risk Assessment
- Study into future growth implications for Redditch Borough;
- Accessibility Study and Settlement Hierarchy.

Based on these various sources, a number of key criteria emerge by which sites can be assessed in terms of their constraints. As with the other criteria, constraints are scored between 1 and 5, where 1 represents major constraints affecting the site and no, or relatively insignificant, constraints. These are as follows

1. *Has the site been identified as being contaminated?*

Site has been formally identified as being contaminated – 1

No evidence of contamination (although site investigation may be required) – 5

2. *Biodiversity/Ecology*

Site is located on a SSSI, SWS or LNR – 1

Site is not located on a SSSI, SWS or LNR – 5

3. *Tree Preservation Orders*

Site is located where there is a TPO – 1

Site is not located where there is a TPO – 5

4. *Open Space*

Site is located on Primarily Open Space (Sub-Regional/Neighbourhood) Open Space – 1

Site is located on Primarily Open Space (All types) – 2

Site is not located on Primarily Open Space – 5

5. *Site Access*

Access needs to be incorporated – 1

Access is already in place – 5

6. *Topography, size and shape*

Site size/shape/topography is a considerable issue – 1

Site size/shape/topography is considered to be a slight issue – 3

Site size/shape/topography is considered to be of no issue– 5

7. *Adjacent occupiers*

Adjacent occupiers are considered to be a major constraint – 1

Adjacent occupiers are considered to be a slight constraint – 3

Adjacent occupiers are not considered to be a major constraint – 5

8. *Flood zones*

Site is located in flood zone Flood Zone 3b - 1

Site is located in flood zone 3a - 2

Site is located in flood zone 2 - 3

Site is not located in flood zone – 5

9. *Accessibility*

Site is located in a non-sustainable location settlement e.g. Feckenham – 1

Site is located in Astwood Bank – 3

Site is located in Redditch urban area – 5

Acknowledgement of constraints

This document acknowledges that the site appraisal process contains weaknesses, for example when assessing the market elements of the appraisal it is a matter of professional judgement regarding a site's suitability for a particular employment use. The Council has aimed to minimise these pitfalls by seeking advice on elements, such as consideration of the sites market suitability.

The need to account for Economic Development, beyond the traditional B-use classes

PPS 4 identifies the need to take account wider Economic Development uses that go beyond B-use classes. The Council has completed work on a Retail Needs Assessments which is due to be updated. The updated version of the Retail Needs Assessment will need to take account of the new PPS 4. In addition to this Stage 2 of the Employment Land Review forecasted employment land requirements up to 2026. As part of this forecasting work a range of economic development forecasts were undertaken which included non B-use classes. Therefore some work has been undertaken on wider use classes in PPS 4. However it should be noted that the Employment Land Review does not go into detail on proposing particular sites to meet projected growth in other Economic Development areas beyond B-use classes. Potentially this is an issue that could be addressed as part of the annual update to this Employment Land Review

Conclusion to PPS 4

It is suggested that the bulk of the requirements set out in the various guidelines of the new PPS 4 have been met by the previous Employment Land Review or are being met through this current update to the Employment Land Review. Potentially there is scope as part of the annual update of this Employment Land Review to consider identification of sites for non B-use classes that contribute towards Economic Development.

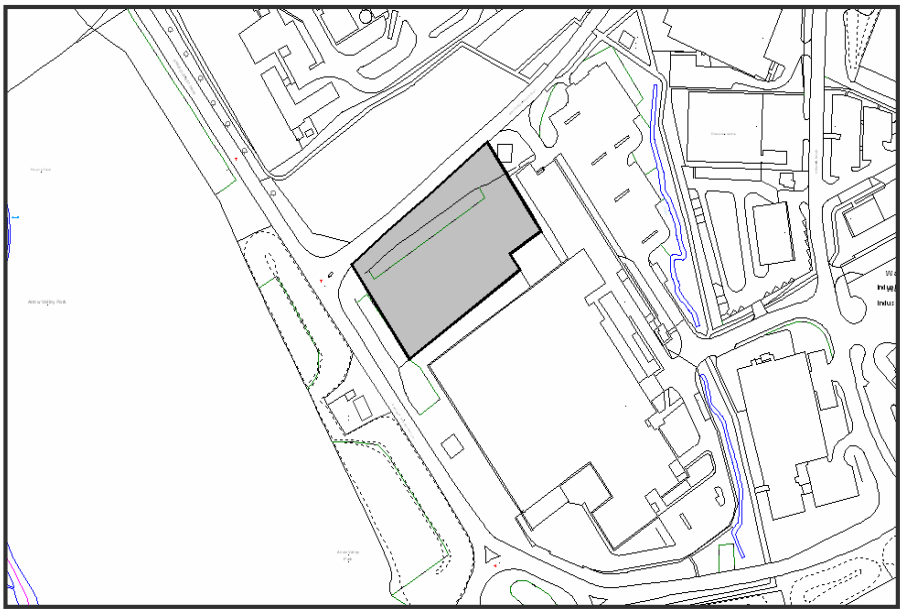
Consultation with Landowners

In order to fully assess the potential employment sites, it was considered necessary to make contact with landowners, using similar criteria to that being used in the Strategic Housing Land Availability Assessment (SHLAA). The main purpose of this consultation was to ensure that the sites identified for employment purposes were viable from the landowner's point of view. Appendix B illustrates a copy of the consultation document sent to landowners. During the consultation a number of the landowners stated that some of the sites would not become available for employment purposes during the plan period. Therefore these sites were removed from the potential list of sites available for employment purposes.

The following sites have been removed from the list of potential sites to meet future Employment Land Requirements because the landowner has indicated that they do not consider or wish to release the site for employment purposes during the next plan period.

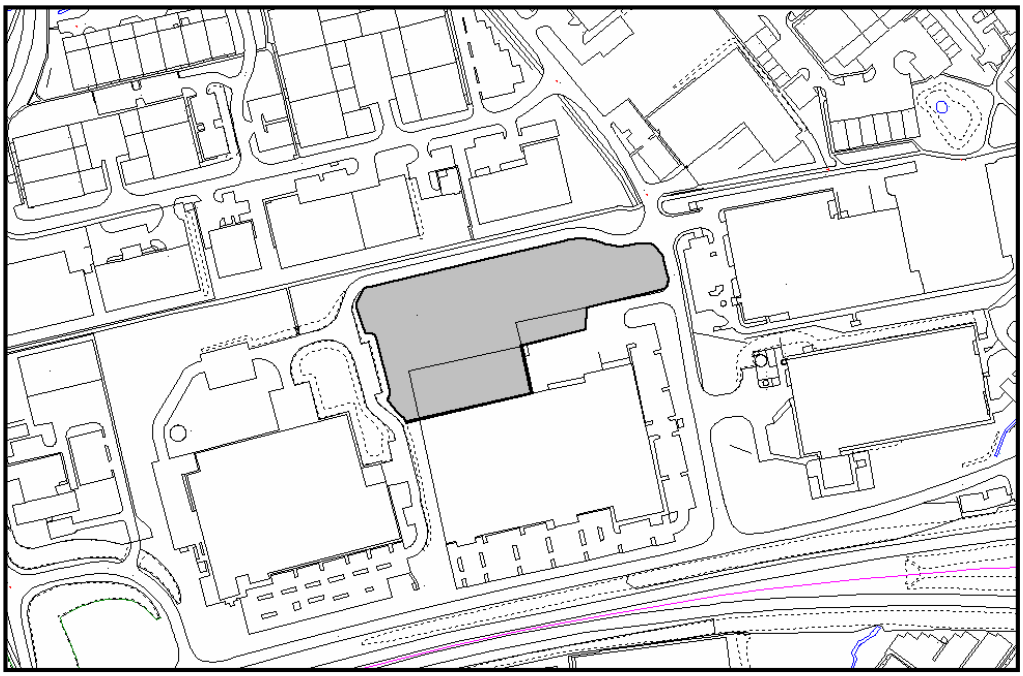
- The major landowner of UCS 9.59 stated that they were not willing for the land to be released for employment purposes. As this is the bulk of the land (coloured in blue) it is considered appropriate to remove this site from the potential list of sites considered suitable for employment purposes.

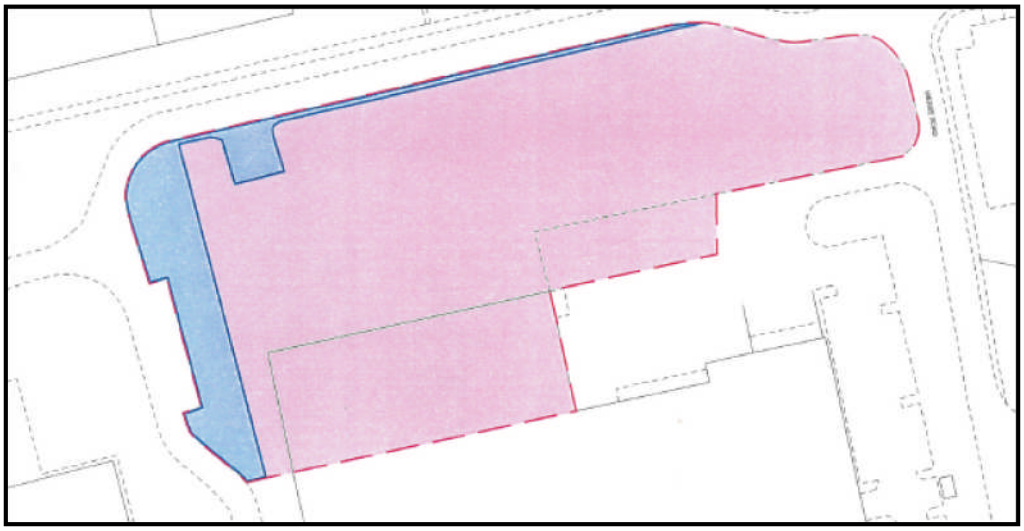
Site Ref: UCS 9.59 **Address:** Land fronting Matchborough Way **Site Area:** 0.58ha



- Part of UCS 4.51 site is not to be released for employment purposes (blue element), in relation to the pink part of the site the it has not been possible to track down the landowner despite a land registry check being undertaken. Therefore with the lack of certainty over this site it is proposed that the site be removed from the Employment Land Review at this stage.

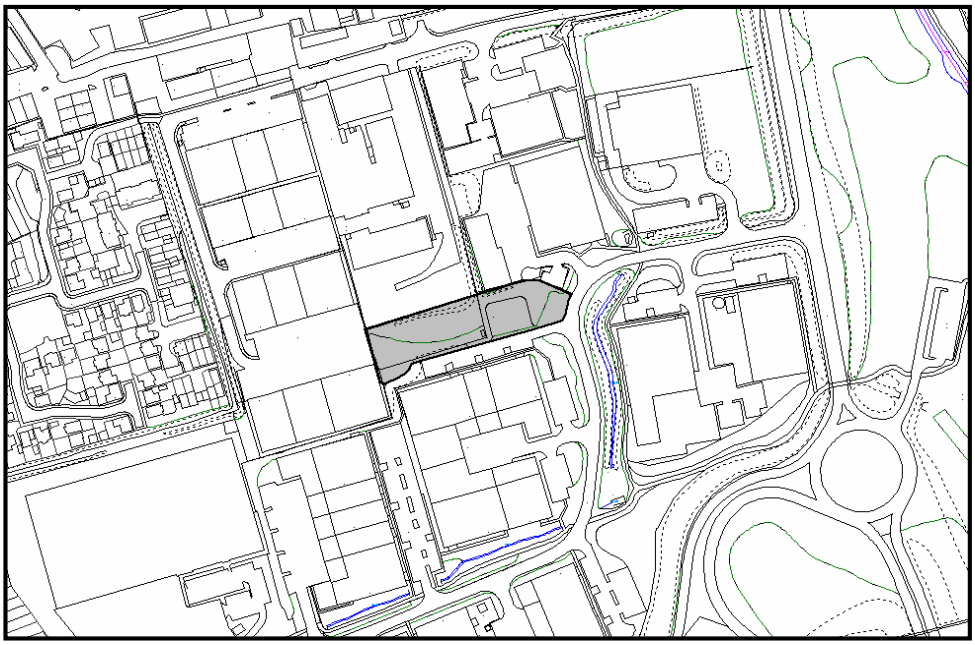
Site Ref: UCS 4.51 **Address:** Part of IN 4, off Merse Road **Site Area:** 1.26ha





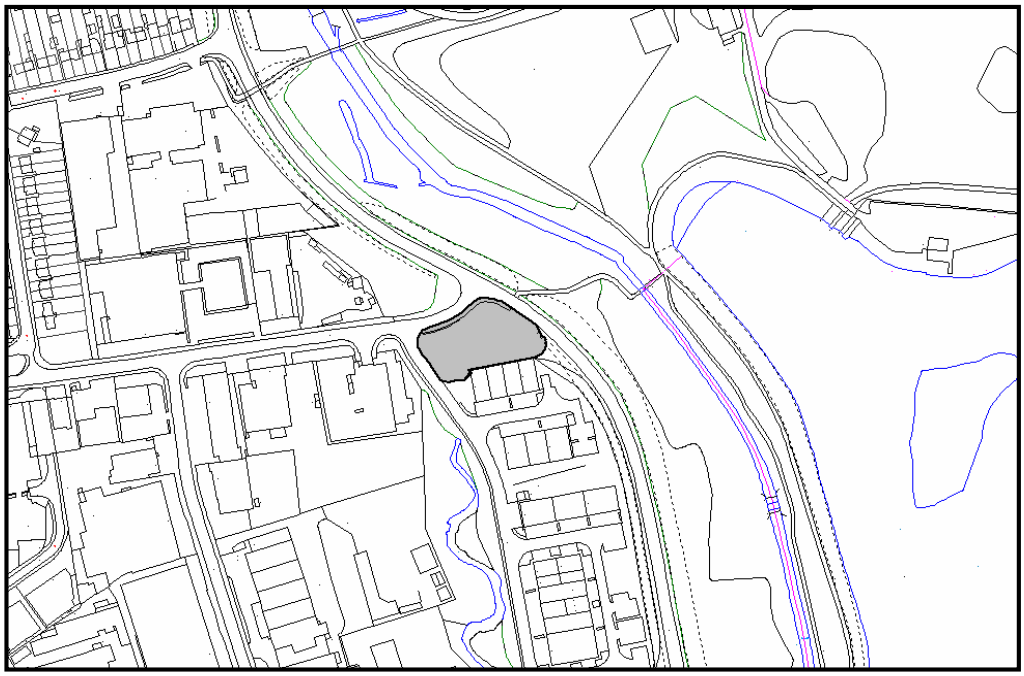
- Based on the responses to UCS 6.18 it is also unclear who the major landowner of the site is leaving a great deal of uncertainty over the site. Therefore the site has been removed from the potential list of sites that could come forward to be designated as potential employment sites.

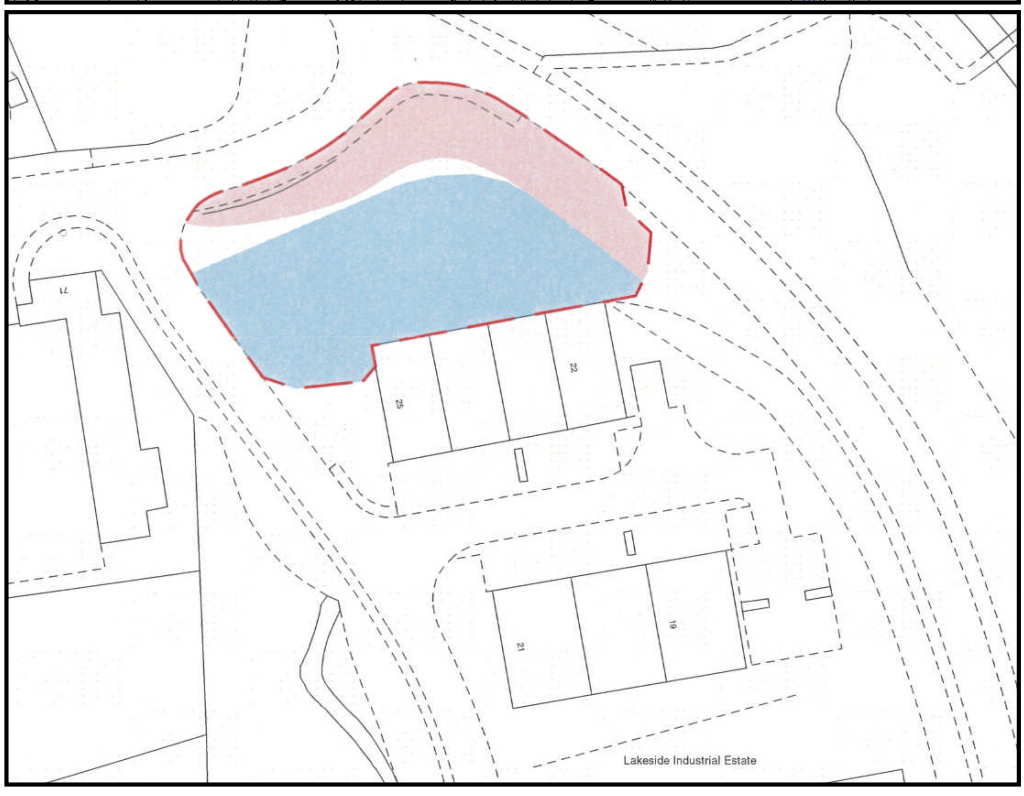
Site Ref: UCS 6.18 **Address:** Land off Broadground Road **Site Area:** 0.43ha



- UCS 6.16 was deemed not suitable for employment development by one of the major landowners, and it has not been possible to contact the other major landowner leaving a great deal of uncertainty over the site. Therefore the site has been removed from the potential list of sites that could come forward to be designated as potential employment sites.

Site Ref: UCS 6.16	**Address:** Land at Arthur Street/New Meadow Road	**Site Area:** 0.27ha





The consultation also provided the opportunity for the Council to be made aware of issues in terms of bringing potential sites forward. Specifically the landowners of sites:

- IN 24 stated that they would be willing for the site to be released for employment. However the landowner considers there to be issues with accessing the site for employment purposes which may mean the site is not viable for employment development. At this stage, it is considered that the site should be progressed for employment purposes until further information is provided which justify this against the criteria in saved Policy E (EMP).3 of Local Plan No.3. If this evidence is provided alternative uses could be pursued on the site.
- The majority landowner of IN 20 identified some environmental constraints with the site, although they are willing for the site to be released for employment. The landowner has stated that they are currently in the process of engaging a consultant to carry out a full investigation into the site. If the landowner comes forward and identifies that the site is no longer viable the site will then be removed.
- In relation to A435 segment 2 although the landowner has indicated that the site could come forward immediately it is their view that the site is still viable for housing development. Therefore this indicates that there could be some issues in progressing the site immediately. It should be noted that the view of the Council is that it should be brought forward for employment purposes.

Based on the information provided it is proposed that the above sites be considered as longer term sites due to the lack of certainty of the sites coming forward for employment development.

In addition to this not all the landowners responded to the consultation opportunity. Where the landowner has not responded to the consultation, there is no evidence that the site would not be viable for employment purposes from a landowner point of view. Therefore it is proposed, withstanding any other issues, these sites are progressed. However if the landowners do come forward and identify potential issues with sites, this will be reviewed as part of the annual update as part of this report.

Site Assessments

Site Assessments were undertaken for this current update on all of the sites that were not assessed as part of the Stage 3 work. The site assessments completed as part of stage 3 are considered to still be appropriate. The criteria for assessing sites as part of this update work was same as the criteria in stage 3. The completed site assessments are contained in Appendix C, the Appendix identifies those assessments undertaken as part of the stage 3 work and assessments undertaken as part of this update. It should be noted that the Land East of Brockhill railway has been assessed as part of this update. Although this was identified in Stage 3 (by White Young Green planning consultants – see 'Joint study into future growth implications for Redditch Borough'), it was considered more robust to assess this site using the criteria developed as part of this Employment Land Review.

The following sites were not considered suitable to be pursued for employment purposes because from a market appeal point of view they are not considered attractive enough to come forward. The sites are:

- IN 55; and
- IN 70.

In addition, following consultation with Council Officers, A435 segment 1 was considered to be unsuitable for development due to the fact it was a balancing area.

Updating the list of potential sites

A fundamental outcome of this update is to provide a list of potential employment sites to meet future requirements.

Gap analysis

In Stage 3 of the Employment Land Review (2009) a gap analysis was undertaken. The purpose of the gap analysis was to identify any gaps in the portfolio of employment land i.e. to assess whether the Borough's employment requirement can be met by the sites put forward and whether the types of employment needs can be met and the sites are balanced. As part of the Stage 3 work a gap analysis was completed based on the forecasts undertaken as part of stage 2 of the Employment Land Review. These forecasts proposed an overall Employment Land Requirement of 59ha. Following the publication of the Panel report into the RSS, the requirement has increased to 68ha, with an additional 2.3ha following the conclusions arising from the Office Needs Assessment. Therefore the gap analysis undertaken in this update relates to the 70.3ha figure. In addition to this, it should be noted that the figures in the stage 3 work were not correct because some employment land supply had not been accounted for; this gap analysis updates the figure appropriately.

Analysis of existing employment sites

During Stage 1 of the Employment Land Review (2009) it was considered that all IN sites should be carried forward to stage 3 (2009). As a consequence all of the existing designated employment sites (known as IN sites) were assessed in detail as part of the stage 3 work. The method of assessment is set out in the site appraisal criteria section above. It is advised in the 'Employment Land Review Guidance Note' (Communities and Local Government 2004) that when carrying out stage 3 of the study, the Council should identify any gaps in the existing employment portfolio. Therefore when carrying out the site appraisal process it was decided to review all existing sites in greater detail, before pursuing any analysis of additional sites. In stage 3 of the employment land review, the remaining IN sites were reported as amounting to 13.45ha. Since the completion of stage 3 a number of other IN sites have had to be reassessed because their planning permission has

lapsed[9]. Furthermore, the stage 3 work did not account for implemented permissions post 2006. This was an error with the stage 3 work. It is also necessary to account for any land that has had planning permission granted but has had no commencement or only part commencement post 2006[10]. Land at Ravensbank has not been analysed as part of this Employment Land Review because it does not fall within the Borough of Redditch, however any land developed post 2006 or remaining capacity at Ravensbank post 2006 is included within the supply of employment land for the Borough. The Council has received no indications as to why this would not come forward. Any land developed post 31st March 2011 will have to count towards the cross boundary requirement, rather than meeting the internal Borough requirement.

There is a need for new land to be brought forward, not simply to meet regional targets, but more specifically to identify land which may be more deliverable in the short term.

Identification of potential sites to come forward for Employment purposes

This stage analyses all of the sites that were deemed suitable for employment purposes in previous assessments, and identifies those sites which are considered suitable to be taken forward. This step uses professional judgement to look in more detail at the site appraisal process. This process scored each of the sites on the criteria outlined earlier. Although the site appraisal process provides a good basis for scoring sites, a more detailed judgement is required at this stage. For example, two sites may receive a similarly high score, but one may have been identified as susceptible to flooding on a regular basis, which means, barring significant mitigation, it is unlikely that this site would come forward. In addition, this update report has carried out consultation with landowners which has resulted that some of the sites previously identified to come forward in stage 3 are no longer viable opportunities to come forward.

What use class each site is considered suitable for:

B1, B2 and B8	B1 and B8 only	B1 offices	B2, B8 and B1 but not offices	To be retained for employment purposes
A435 segment 2 (10.44ha)				
				ELR 04

[9] The approach taken to sites with planning permission but with no implementation was that they are considered suitable for employment purposes based on the fact that planning permission has been applied for and approved.

[10] Only land that has not been developed post 2006 is accounted for.

B1, B2 and B8	B1 and B8 only	B1 offices	B2, B8 and B1 but not offices	To be retained for employment purposes
				(0.5ha)
IN 34 (0.65ha)				
IN 59 (0.38ha)				
Land East of Brockhill railway line (3.5ha)				
IN 67 (6.6ha)				
IN 54 (0.29ha)				
IN 20 (1.32ha)				
IN 15 (0.40ha)				
UCS 9.58 (0.60ha)				
UCS 9.19 (0.19ha)				
	IN 37 (0.62ha)			
	IN 24 (0.90ha)			
		Land to the Rear of Alexandra Hospital (0.5ha)		
		UCS 7.5 (0.19ha)		
			IN 58 (1.10ha)	
Totals				
24.37ha	1.52	0.69	1.10	0.5

Annual Monitoring

Historically the Council has carried out annual monitoring of its employment land supply. The 'Employment Land Review: Guidance Note' (2004) recommends that the following monitoring be undertaken:

1. Employment Land and premises database;
2. Employment permissions granted, by type;
3. Employment permissions developed by type, matched to allocated sites;
4. Permissions and development of sites and premises previously in employment use for non-employment uses;
5. Employment land and premises available and recent transactions;
6. Employment premises enquiries (if the authority has an estates or economic development team)
7. Employer requirements and aspirations (from focus groups/periodic surveys)

It is anticipated that the bulk of the above monitoring information can be reported in the annual employment land monitoring work. However, in relation to point 1, this information is not currently published although some of the database information can be made available upon request from Economic Development.

Conclusion

This update has sought to bring the Employment Land Review work carried out in 2009 up-to-date, particularly in light of the new PPS 4. The report has assessed some additional employment sites and carried out some additional work on the sites identified in the stage 3 work. However the report did not carry out additional site appraisals on those sites assessed in stage 3 of the Employment Land Review. Nor, despite the site boundary for the Land to the Rear of the Alexandra Hospital being changed (see Appendix D) following liaisons with one of the landowners, has the view on the site been changed, in that it is still considered suitable for a mixed use development incorporating 5000sq.m of offices.

Findings of this update should be taken forward into the Council's LDF in order to assist in setting the spatial strategy for Redditch Borough in the long term. There are both broad strategic issues that need to be addressed, as well as specific sustainability and LDF objectives that have to be achieved by including these new policies in the LDF.

The key strategic and policy issues that need to be addressed are outlined below:

- Those larger strategic sites which have been identified specifically for office use, or a mixed use development (i.e. B use classes and another use class) should be progressed through a more detailed planning document such as a Supplementary Planning Document. The purpose of the document would be to justify the need to use the land for office/B1 use rather than any other employment use whilst guiding the design of the development in a sensitive location. In addition an SPD can provide more detail on site layout for future employment sites.

- To ensure appropriate employment uses come forward through the planning process, the Council's economic priorities (Appendix E) should be accounted for in the Core Strategy, and as part of the work undertaken by the Economic Development Unit.

- The Land to the Rear of Alexandra Hospital site should be progressed as a mixed use development incorporating 5000 sq.m of offices.

- The following sites could be identified to meet employment purposes in the short term (5 year period in line the Preferred Option RSS and Panel Report):

- IN 67 (6.6ha)
- Remaining capacity at Ravensbank (4.18ha) (Post 31st March 2011 any land not developed will count towards Redditch Borough's growth target but will not count towards meeting the 33.3ha internal requirement).
- IN 15 (0.40ha)

However it should be noted all of the above sites are not actually readily available, they are simply more likely to come forward in the short term. These sites have been included in this category where the landowner has identified that they believe the site can come forward within the next five years.

- The following sites could be identified to meet employment purposes in the long term:
  - Land at Brockhill East of the Railway line (3.5ha)
  - Land to the Rear of Alexandra Hospital (0.5ha)
  - A435 segment 2 (10.44ha)
  - IN 20 (1.32ha)
  - IN 59 (0.38ha)
  - IN 24 (0.90 ha)
  - IN 34 (0.65ha)
  - IN 37 (0.62ha)
  - IN 54 (0.29ha)
  - UCS 7.5 (0.19ha)
  - UCS 9.19 (0.19ha)
  - UCS 9.58 (0.60ha)
  - IN 58 (1.10ha)

Therefore, in total, Redditch Borough Council has identified 38.29 ha (this accounts for committed and completed sites post 2006) of employment land which can contribute to its employment land requirement of 33.3 ha. Clearly this figure is well in excess of the actual employment land requirement within the Borough boundary. However there is some uncertainty over the Winyates Green Triangle, and whether the site is economically viable. Therefore at this stage it is considered appropriate to have a reserve of employment land in case this land is deemed non viable. Once the situation with the Winyates Green Triangle land is rectified the Employment Land Review can be updated.

In addition to the above conclusions the below comments below should be considered.

- Safeguarding the above list of sites up to 2026 for employment purposes.
- There will need to be cross-border employment growth in order to cater for Redditch Borough's needs, this will need to be progressed suitably, and linkages should ideally, be made with employment locations in Redditch. This should be achieved through Joint Working.
- Use and require developer contributions from employment development.
- Restriction of uses at certain sites to cater for specific growth sectors e.g. UCS 7.5.
- Maximum of 11ha of B8 uses to be approved, which should be driven by the Core Strategy.
- It is also recommended that the list of Employment sites proposed to come forward should be renamed for simplicity, Appendix F proposes a revised list of site references names.

Appendix A – Example matrix form

Site	Market interest	Balance of supply and demand	Public transport	Ease of access	External Environment	Total	Site	Internal Environment	Strategic Access	Total	Site	Contaminated land	Open Space	Biodiversity/ Ecology	TPOs	Site Access	Topography etc.	Adjacent occupiers	Flood zones	Accessibility	Total	Site
UCS9.62	5	5	5	5	5	25	UCS9.62	1	5	6	UCS9.62	5	5	5	1	5	3	5	3	5	37	UCS9.62

Appendix B – Supplementary site information

Redditch Borough Council **Employment Land Review** **SUPPLEMENTARY SITE INFORMATION**

Site Address:	**Site Ref:**

Is the site boundary shown on the plan below correct? If not, please indicate the correct extent of the site to which this information relates	

Availability	
Is the site wholly owned/controlled by you or your company? Are you/your company willing to release the site for employment development?	
When could the site be available if it was considered a suitable site for employment development?	
Is the site freehold or leasehold? Is the site registered at the Land Registry with absolute title?	
Do you have direct control over the sale, lease or other transfer of ownership of the site?	
Are there any third party rights which could affect your ability to dispose of the site or any part of it, or restrict when the site can be assembled?	
Would the site have immediate vacant possession if transferred or leased?	
Is your land the subject of an option agreement with a developer?	
Is it possible that your land can be sold free of potential ransom on access to neighbouring land?	
Is the site or any part of it subject to a legal charge/mortgage, debenture or a floating charge?	

Suitability	
Can you provide evidence of any constraints in respect of:	
• Vehicular access and traffic impact	
• Access to public transport, cycle and pedestrian routes (existing and potential) to Redditch town centre, employment areas, schools, Alexandra Hospital, Redditch Bus/Rail interchange	
• Flood Zones 2 and 3	
• Surface water drainage	
• Foul water drainage	
• Public utilities	
• Ecological, archaeological and historic environment issues	
• Residential amenity (eg privacy/overlooking, noise, vibration)	
• Contamination or other pollution	
• Visual and landscape impact	
Where there are identified constraints, can you provide evidence of how these may be acceptably mitigated?	
Do any constraints affect the phased release of the site during the period to 2026?	
If the site is developed could it provide access to other land that would be suitable for future consideration as development sites?	
Achievability	
What off-site infrastructure is required for the development, if known, and what is the estimated cost?	

What abnormal on-site development costs are associated with the development, for example site remediation, social infrastructure eg new schools, community provision?	

Please return your completed form to:

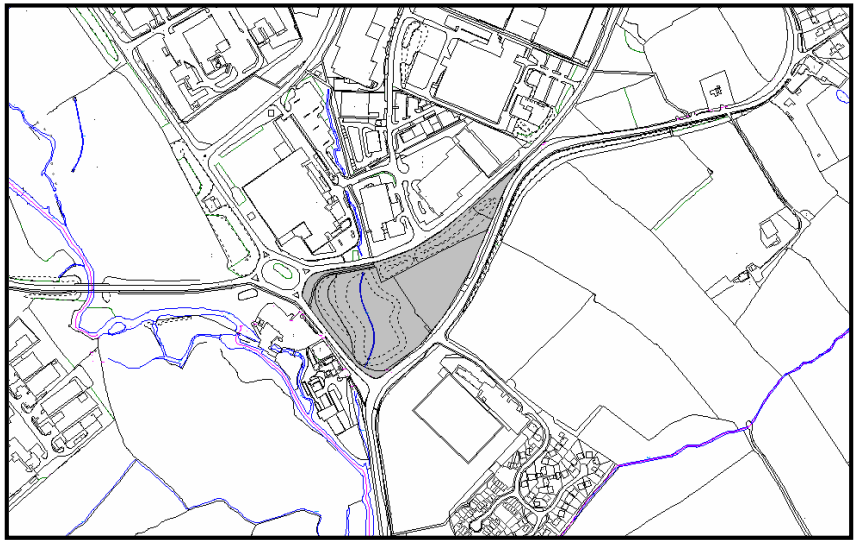
Ashley Baldwin
Development Plans
Redditch Borough Council
Walter Stranz Square
Redditch
Worcs. B98 8AH

Ashley.baldwin@redditchbc.gov.uk

Forms to be returned no later than 28 February 2010

Appendix C – Site Assessments

Site Ref: A435 segment 1 **Address:** A435 Area of Development Restraint **Site Area:** 3.46ha



Current Site Status (including planning policy history) Area of Development Restraint

Development Control history: N/A

Description of Site and suitable uses: Site is heavily overgrown with a balancing area.

Adjacent land use/conflicts?
Employment area is adjacent to the site.

Floor space in use/vacant: N/A

Ownership:

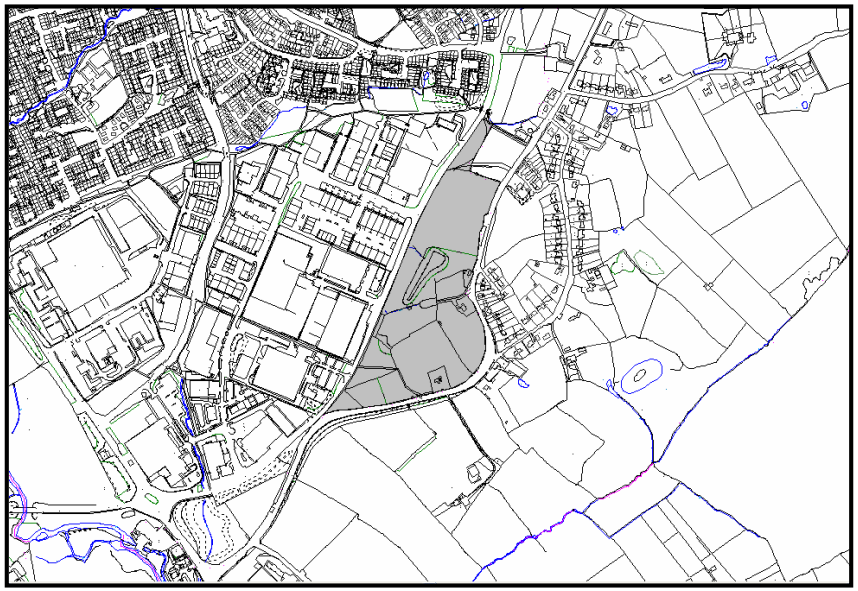
Strategic access: Adjacent to A435, site could be accessed from Claybrook drive.

Level of car parking/public transport: If site to north of this segment is brought forward for employment purposes, car parking could be provided there. Site is in proximity to bus route.

Known constraints or infrastructure requirements (see site constraints checklist): Falls within Flood zone 2, Warwick TPO No.7. Consultation with internal offices has deemed that the site is not suitable to come forward due to balancing area. Contaminated land – Requires site investigation

Market appraisal/suitable type of Development: Suitable for B1, B2, and B8, with B1 the most likely end use.

Site Ref: A435 segment 2 **Address:** A435 Area of Development Restraint **Site Area:** 10.44ha



Current Site Status (including planning policy history)
Area of Development Restraint

Development Control history: N/A

Description of Site and suitable uses: Low lying site, with predominantly planted rather than natural vegetation.

Adjacent land use/conflicts? Predominantly employment, with some housing.

Floor space in use/vacant: N/A

Ownership: 1)

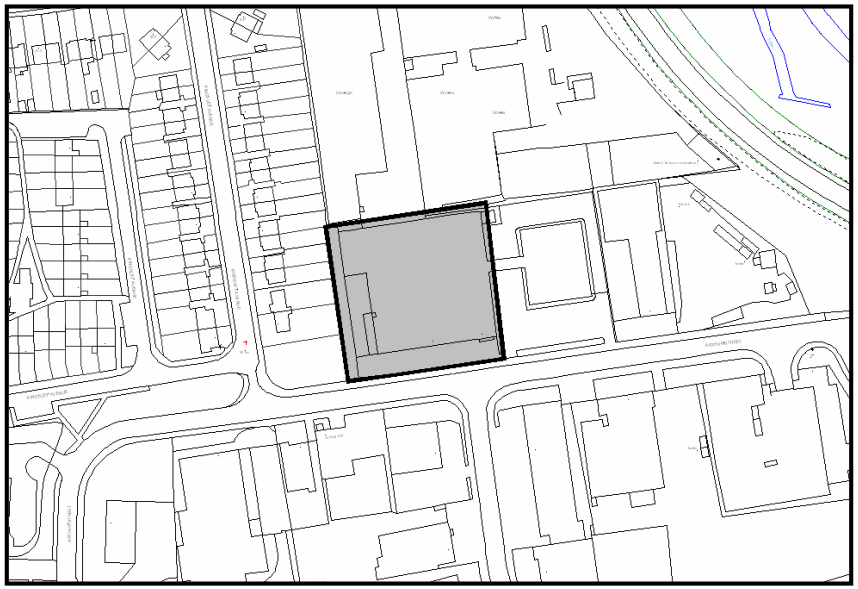
Strategic access: Adjacent to A435, and could be accessed off Claybrook Drive.

Level of car parking/public transport: Car parking could be provided on site. Site is also adjacent to bus route.

Known constraints or infrastructure requirements (see site constraints checklist): Warwick New Town TPO. Contaminated land – Requires site investigation

Market appraisal/suitable type of Development: B1, B2 and B8

Site Ref: ELR 04 **Address:** 76 Arthur Street **Site Area:** 0.5ha



Current Site Status (including planning policy history)
Operating Employment Unit

Development Control history: 2006/288

Description of Site and suitable uses: Existing Employment site

Adjacent land use/conflicts? Industrial and residential

Floor space in use/vacant: In use

Ownership:

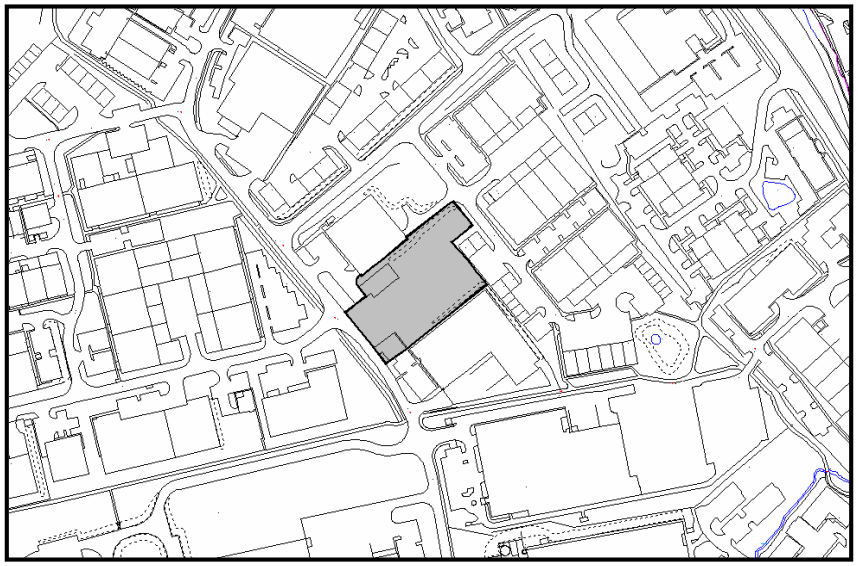
Strategic access: Accessed off Arthur Street

Level of car parking/public transport: Parking provided on site

Known constraints or infrastructure requirements (see site constraints checklist): No known constraints.

Market appraisal/suitable type of Development: Site is considered to be maintained as an employment site. The site was submitted as part of the SHLAA. If housing is to be pursued the process set out in the Employment Land Monitoring SPG must be followed.

Site Ref: IN34 **Address:** Merse Road, North Moons Moat **Site Area:** 0.65ha



Current Site Status (including Planning policy history)
Planning Permission expired.

Development Control history: N/A

Description of Site and suitable uses: Greenfiled site, low lying, forms extension to Industrial Estate.

Adjacent land use/conflicts? Adjacent to other employment uses (industrial)

Floor space in use/vacant: N/A

Ownership:

Strategic access: Accessed of the A4023, Moons Moat Drive, Merse Road

Level of car parking/public transport: Car parking can be provided at this location, the site is within 400m of a bus route.

Known constraints or infrastructure requirements (see site constraints checklist): New Town TPO No.8. Contaminated land – Requires site investigation

Market appraisal/suitable type of Development: Suitable for B1, B2 and B8 uses.

Market Attractiveness Factors

1.1 The site has been formally identified for employment for at least 10 years.

1.2 Planning application 06/385 was approved on 14/9/06 for partial development of the site (approx. 1/3 rd).

1.3 The site is not being actively marketed as an employment site.

1.4 The site is not owned by a developer or other agency known to undertake employment development.

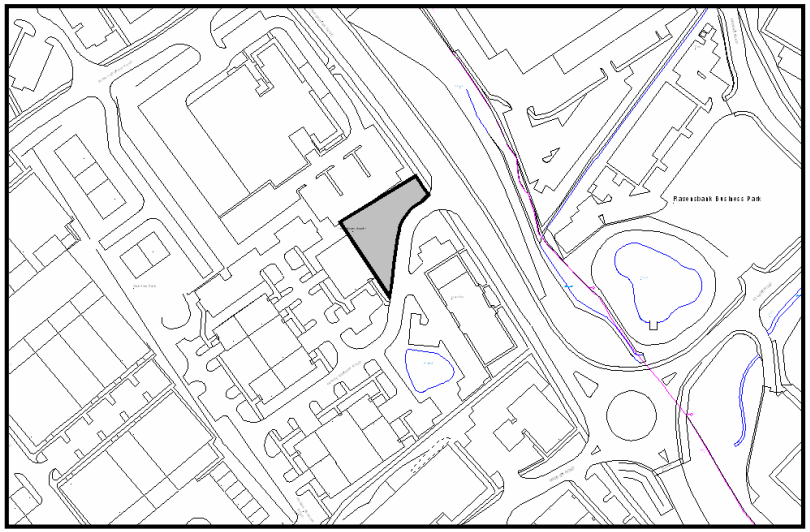
1.5 The site is in multiple ownership.

1.6 There is a valid planning permission covering approx. 1/3 rd of the site.

Sustainable Development Factors

2.1 Employment is the only acceptable form of built development for this site because of adjoining uses.

Site Ref: IN55 **Address:** Centech Park, Fringe Meadow Road **Site Area:** 0.11ha



Current Site Status (including planning policy history) Planning permission expired on site.

Development Control history: 97/279 – 2 storey office block

Description of Site and suitable uses: Low lying site, currently constitutes a landscaped gateway to Centech Park.

Adjacent land use/conflicts? Adj. to other employment type uses

Floor space in use/vacant: N/A

Ownership:

Strategic access: The site has direct access onto the highway network (A4023) via Ravensbank Road.

Level of car parking/public transport: Site is very small and difficult to envisage how car parking could be provided on site, however the adjacent units have car parking facilities which could be expanded. Site is adjacent to bus route.

Known constraints or infrastructure requirements (see site constraints checklist): Small site, therefore HGV access is an issue, car parking is also an issue. New Town TPO No.7. Contaminated land – Requires site investigation.

Market appraisal/suitable type of Development: Would only be suitable for B1 office development, however the size of the site means that it is only really suitable if the existing unit want to extend.

Market Attractiveness Factors

1.1 The site has not been formally identified for employment for at least 10 years.

1.2 02/365

1.3 The site is not being actively marketed as an employment site.

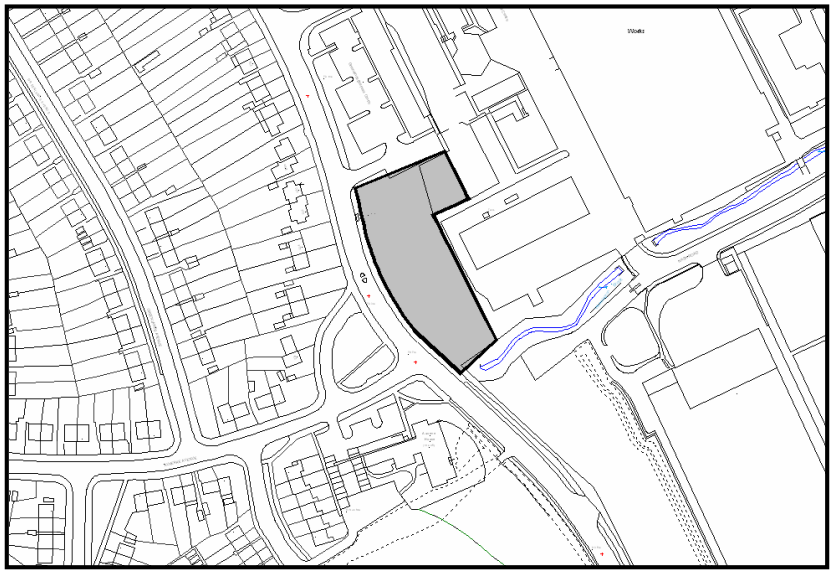
1.4 The site is owned by a developer.

1.5 The site is in single ownership by an organisation known to undertake employment development.

Sustainable Development Factors

2.1 Employment is the only acceptable form of built development on this site because of adjoining uses.

Site Ref: IN59 **Address:** Adjacent Greenlands Business Centre, Studley Road **Site Area:** 0.38ha



Current Site Status (including planning policy history)

Development Control history: 2001/293

Description of Site and suitable uses: Low lying, suitable for employment purposes

Adjacent land use/conflicts? Employment and residential units surround the site.

Floor space in use/vacant: N/A

Ownership:

Strategic access: Site has direct access onto highway network.

Level of car parking/public transport: Car parking can be provided on site, site is also adjacent to bus network. Potentially access to the site could be incorporated to the rear of the site.

Known constraints or infrastructure requirements (see site constraints checklist): Vehicles accessing the site will have to compete with a built up area. Contaminated land – Requires site investigation.

Market appraisal/suitable type of Development: B1 is the most suitable use. However interest in the site has previously come from non B1 uses. Therefore restricted time use for B2, and B8 could be more viable.

Market Attractiveness Factors

1.1 The site has not been formally identified for employment for at least 10 years.

1.2 01/293

1.3 The site is not currently being actively marketed as an employment site. The site was actively marketed from December 2000 – June 2006.

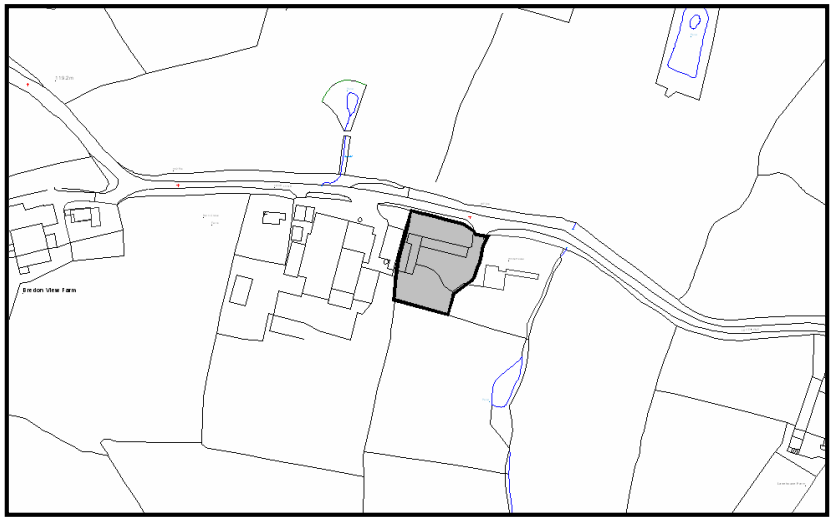
1.4 The site is not owned by a developer or other agency known to undertake employment development.

1.5 The site is in single ownership by an organisation who may bring it forward for development.

Sustainable Development Factors

2.1 Employment is not the only acceptable form of built development on this site as it is adjacent to residential developments.

Site Ref: IN70 **Address:** Barns at Whitehouse Farmhouse **Site Area:** 0.19ha



Development Control history:
99/002 – conversion of barns for B1 use
04/504 – renewal of approval – conversion of barns for B1 use

Description of Site and suitable uses: Site is currently used on an agricultural basis, located in rural area.

Adjacent land use/conflicts? Adjacent to agricultural use, only suitable for office use.

Floor space in use/vacant: N/A

Ownership:

Strategic access: The site has poor highway access, situated on rural road.

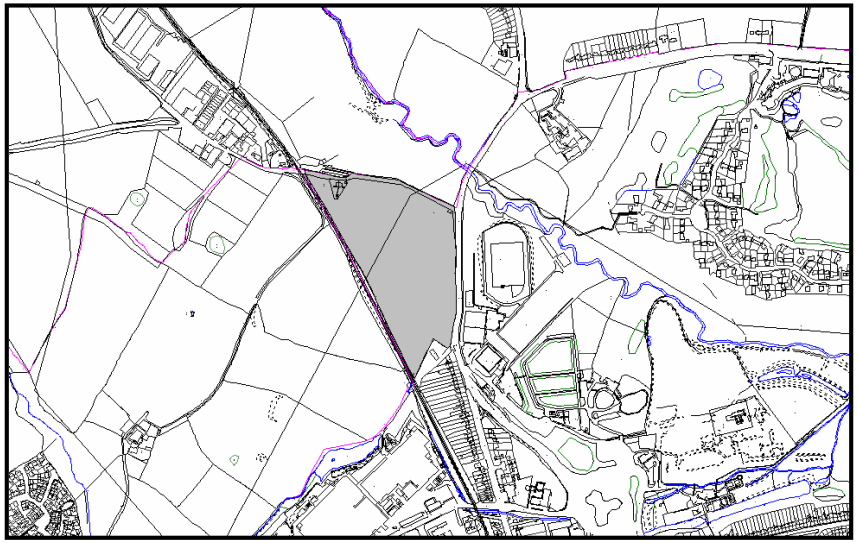
Level of car parking/public transport: Car parking could be provided on site, site has very poor public transport links with no busses running past site.

Known constraints or infrastructure requirements (see site constraints checklist): Public transport, accessibility.
Contaminated land – Requires site investigation

Current Site Status (including planning policy history) Planning permission expired on site.

Market appraisal/suitable type of Development: Limited market appeal.

Site Ref: Land East of Brockhill Railway Line **Address:** Eastern section of IN 67 **Site Area:** 5.03 ha



Development Control history: Application for Bordesley bypass – permission has expired

Description of Site and suitable uses:
Suitable for employment purposes, agricultural uses

Adjacent land use/conflicts?
Residential unit, agriculture, and business park

Floor space in use/vacant: N/A

Ownership:

Strategic access: Accessed off the A441

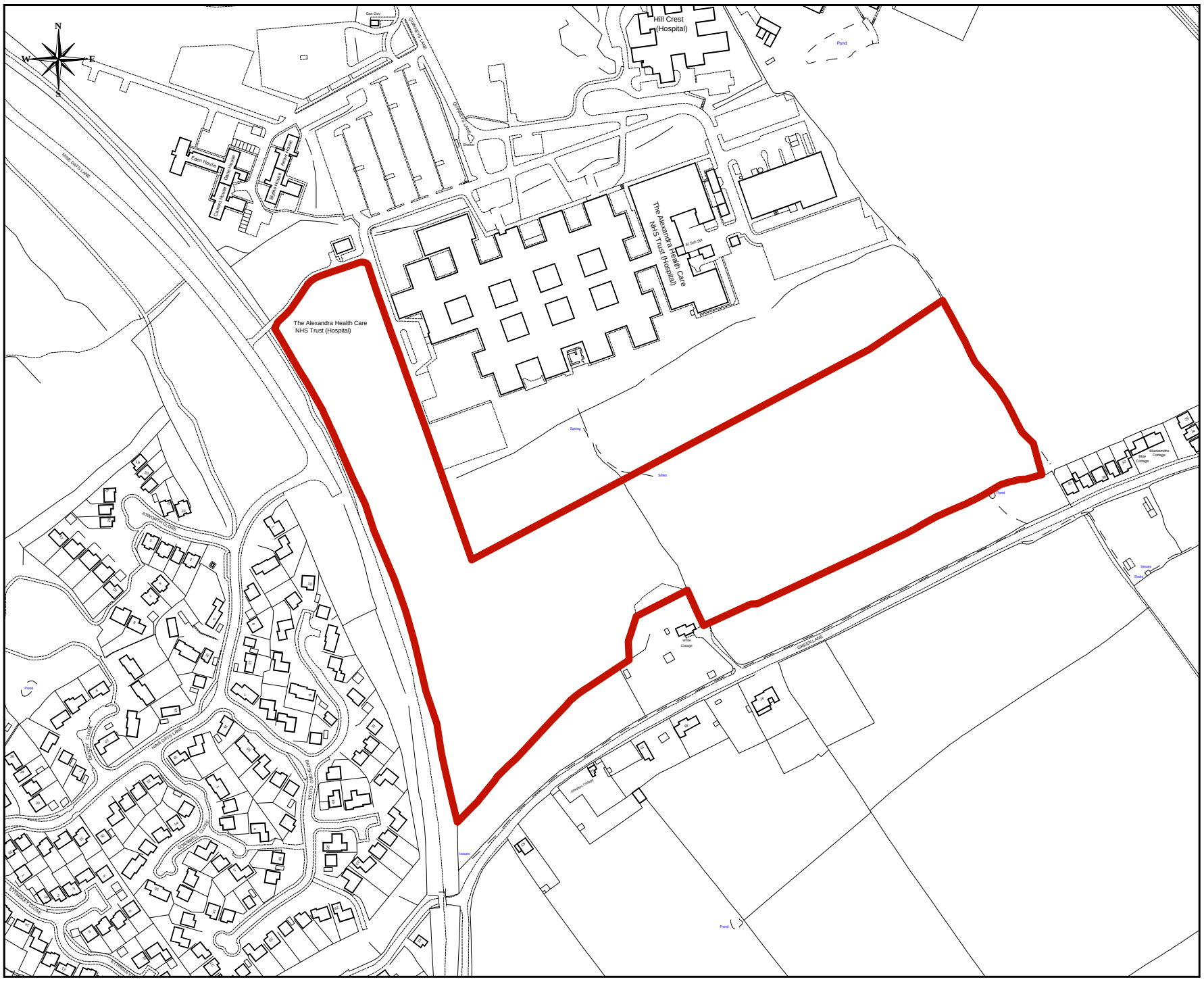
Level of car parking/public transport:
Can be provided on site, bus stop is located adjacent to site.

Known constraints or infrastructure requirements (see site constraints checklist): Weights lane is not suitable for a high level of traffic; Infrastructure requirements meant the site size is likely to be reduced to 3.5ha. Topography of site is a slight issue. Site is a gateway site and therefore employment uses should be designed to reflect this. Contaminated land – Requires site investigation.

Current Site Status (including planning policy history) Designated as an ADR – with a road reserve

Market appraisal/suitable type of Development:
B1, B2 and B8 uses.

Appendix D – Revised boundary for Land to Rear of Alexandra Hospital



The Alexandra Health Care
NHS Trust (Hospital)

Notes:

Date	Rev	Details

Drawing:

Land to the Rear of Alexandra Hospital

Drawn:	Scale: 1/2500
Surveyed:	Date:

Drawing No:

Planning Services
Town Hall
Walter Stranz Square
Redditch
Worcs B98 8AH

REDDITCH BOROUGH COUNCIL

making a difference

www.redditchbc.gov.uk

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Appendix E – The Council's Economic Priorities

Business

BP1 Support for manufacturing companies.

BP2 Encourage diversification away from low value-added manufacturing / automotive industries.

BP3 Business retention.

BP4 Support business start-ups.

BP5 Establish and maintain a reputation for Redditch Borough Council as a "Business Friendly Council".

BP6 Exploit opportunities created by the Central Technology Belt and Cluster Development.

BP 7 Monitor Government requirements with regard to the single business account.

People

PP1 Encourage entrepreneurialism in young people.

PP2 Foster economic ambition in young people.

PP3 Improve links between education providers and employers.

PP4 Reduce out-migration of skilled young people.

PP5 Minimise the impact of the loss of highly skilled, older workers due to retirement.

PP6 Encourage continual skills development in the workforce.

PP7 Minimise Worklessness in order to assist in creating prosperous communities.

Place

PLP1 Promote Redditch as a business location.

PLP2 Protect employment land.

PLP3 Assist businesses to improve their environmental performance

PLP4 Work with businesses to address their issues regarding security.

PLP5 Provide a commercial property service to assist businesses to find suitable premises.

PLP6 Encourage business tourism.

PLP7 Promote allocated employment sites that are not currently on the market in order to encourage their development.

PLP8 Retain and enhance vitality of the town centre

Powerful Voice

Actions

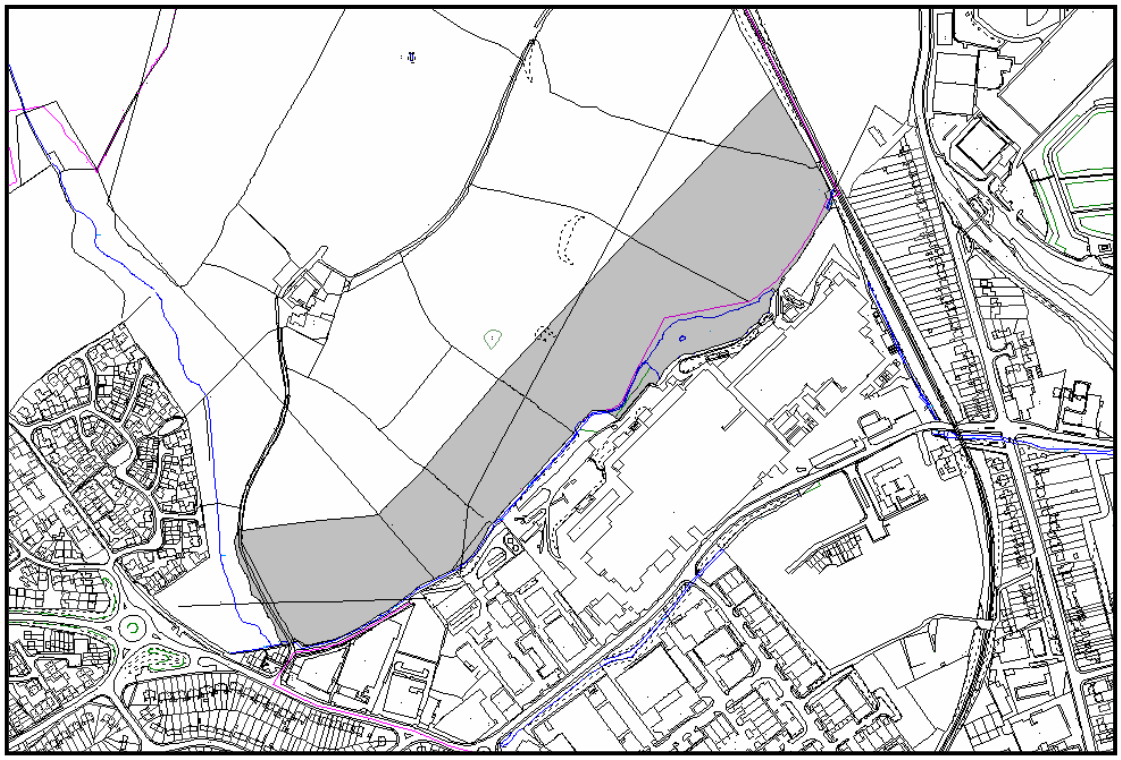
- Keep abreast of Regional and Sub-Regional economic development matters and funding opportunities.

- Work with partner organisations to maximise the benefit to Redditch of any opportunities, e.g. attend WEP meetings.

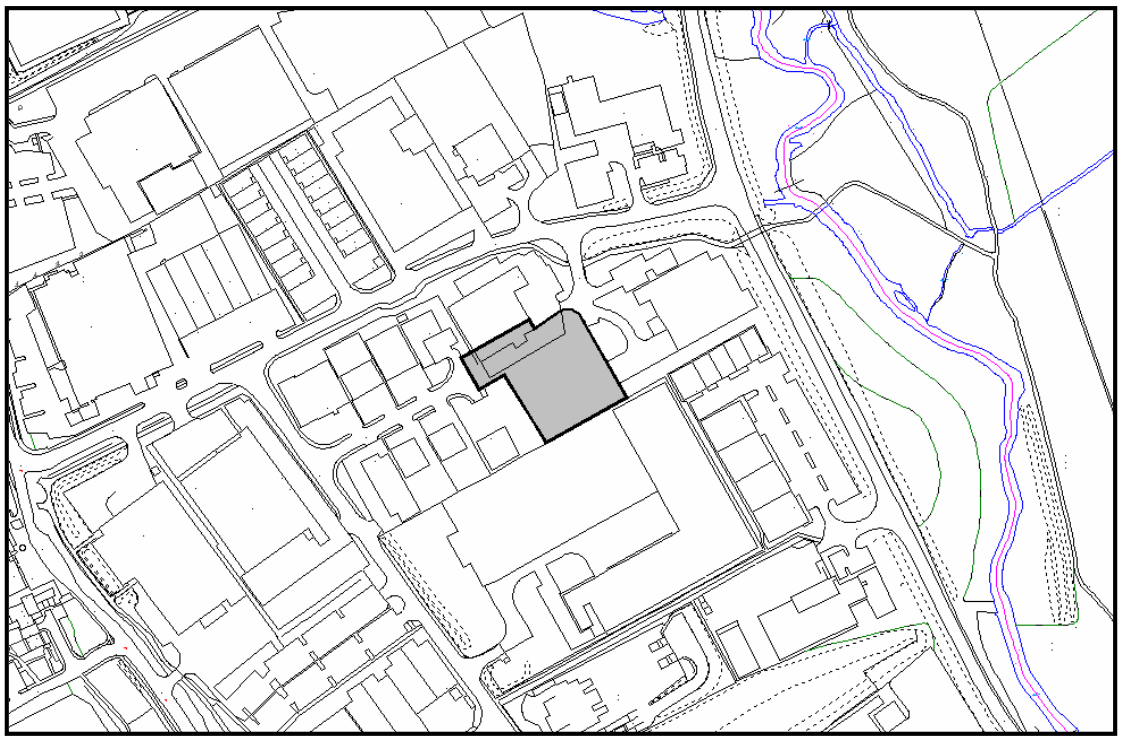
- To promote the skills needs of residents and businesses in Redditch to strategic bodies such as the Learning & Skills Council.

Appendix F – List of revised site names

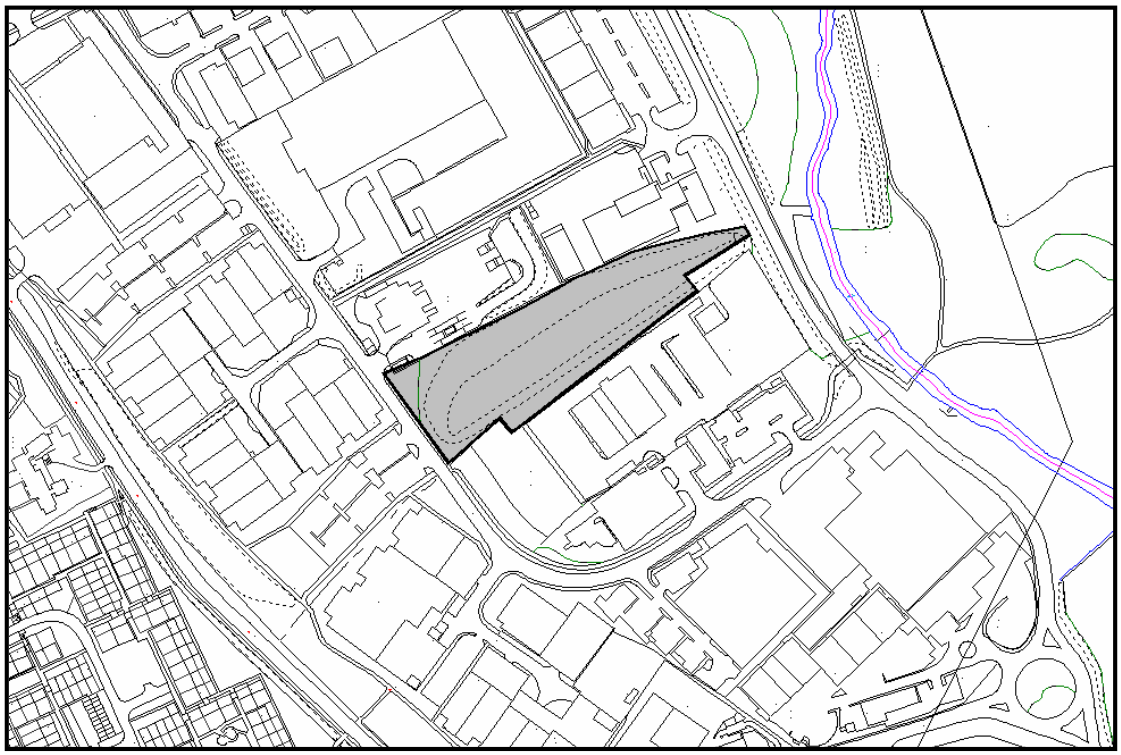
Historical reference: IN 67	Proposed new site reference: EL 01



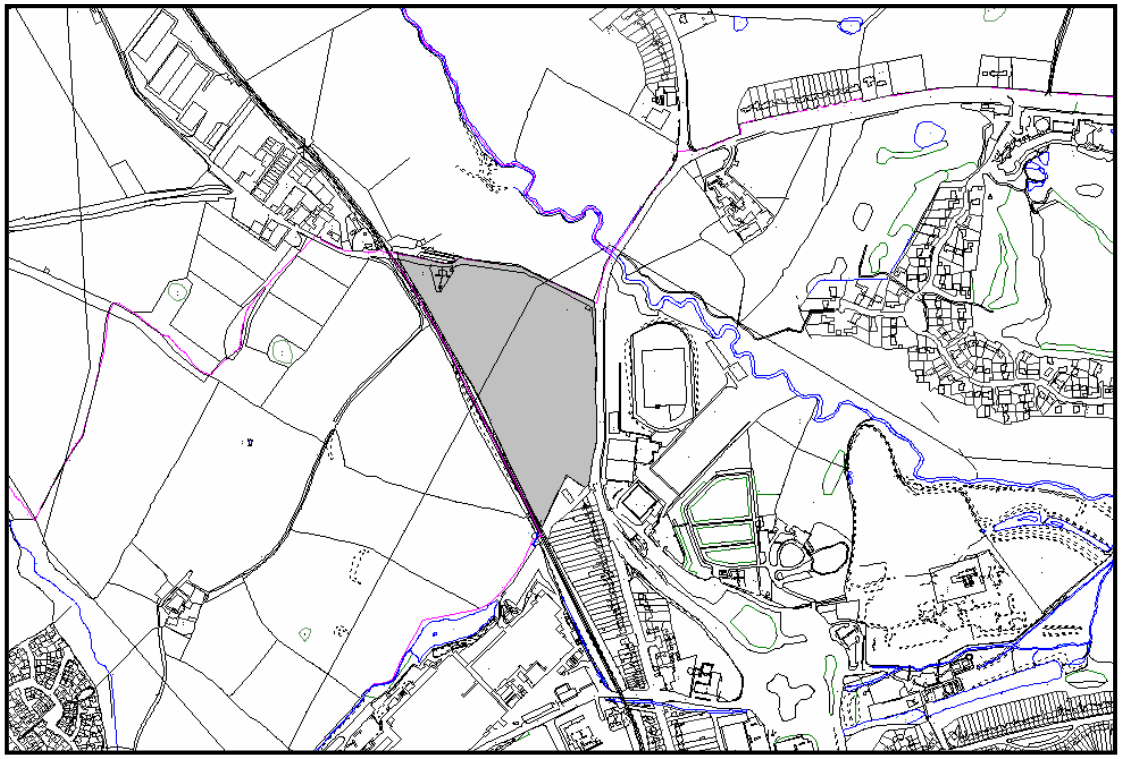
Historical reference: IN 15	Proposed new site reference: EL 02



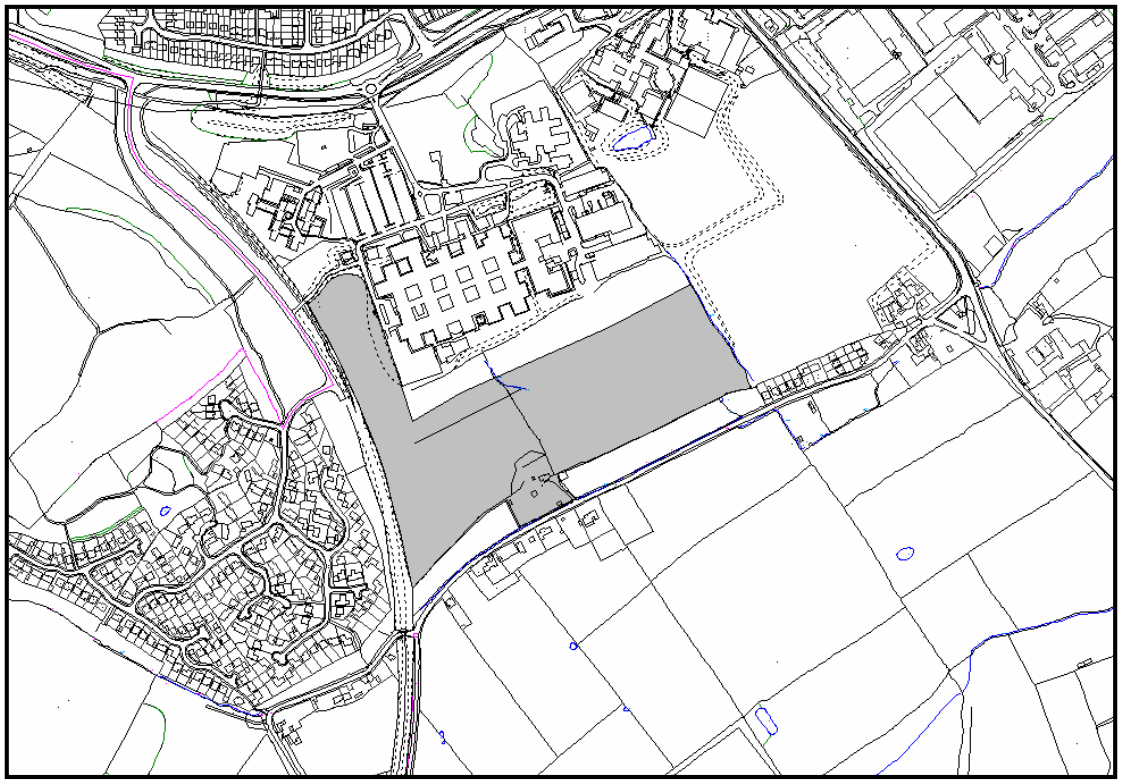
Historical reference: IN 58 Proposed new site reference: EL 03



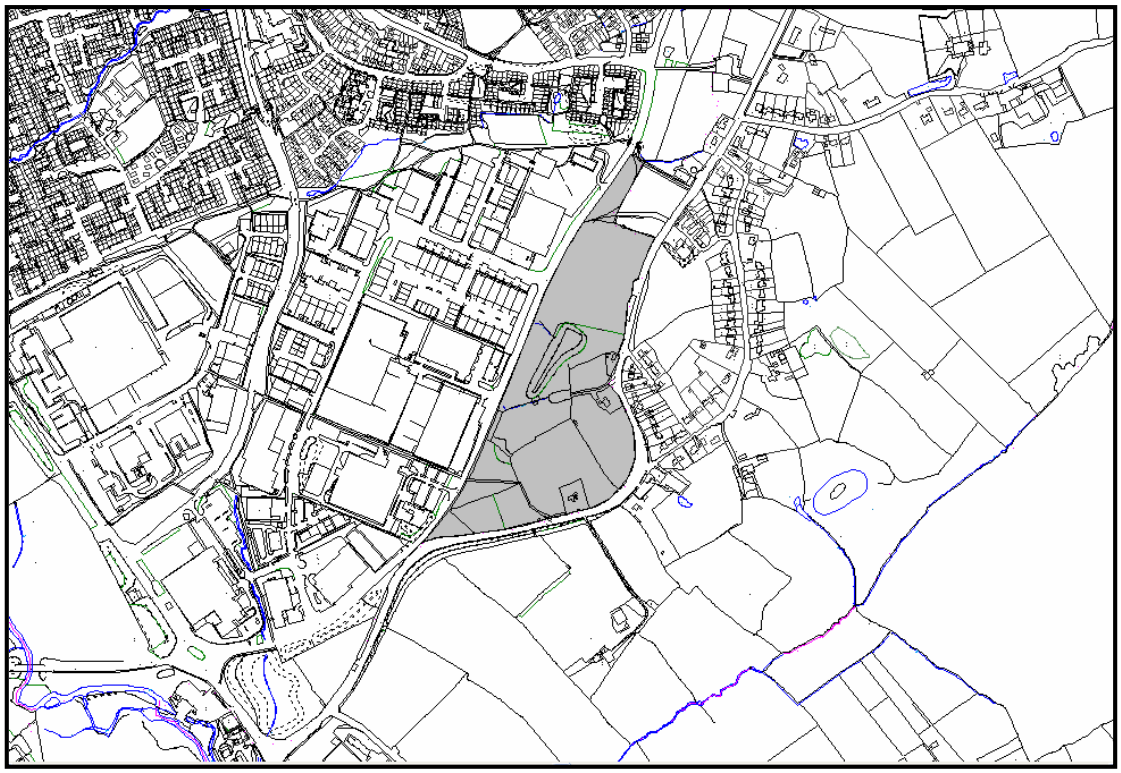
Historical reference: Land East of Brockhill
Proposed new site reference: EL 04



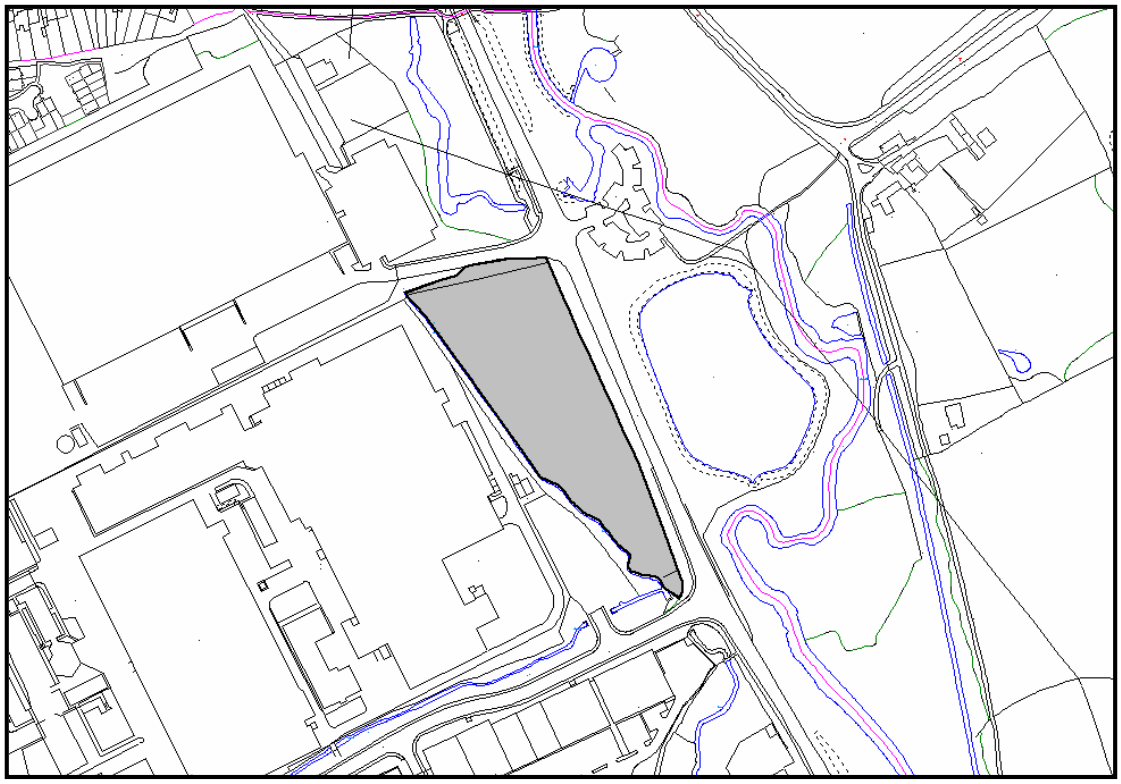
Historical reference: Land East of Alexandra Hospital
Proposed new site reference: EL 05



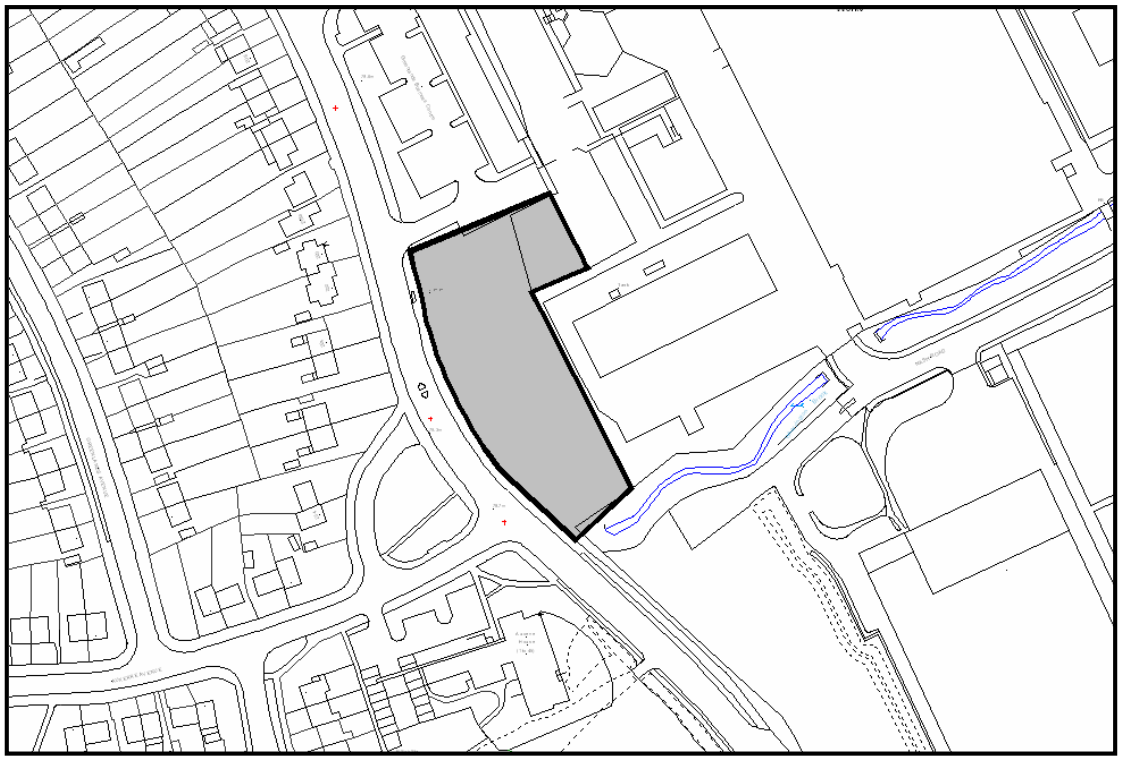
Historical reference: A435 Segment 2
Proposed new site reference: EL 06



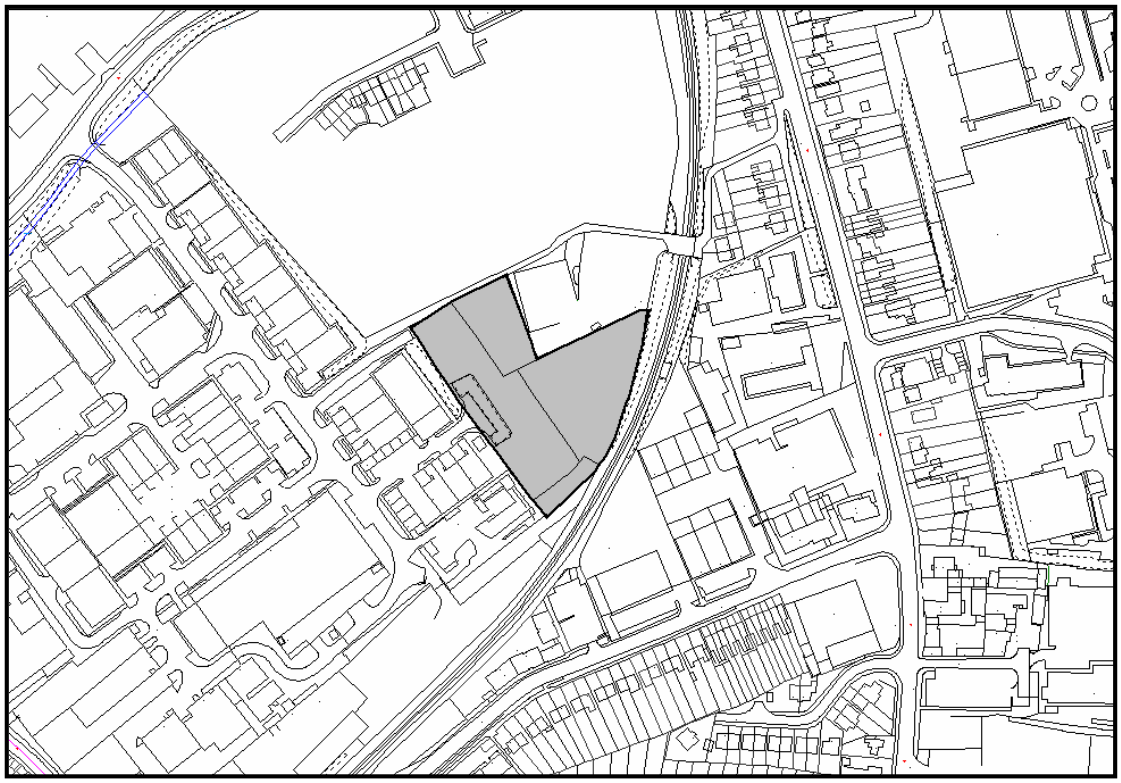
Historical reference: IN 20	Proposed new site reference: EL 07



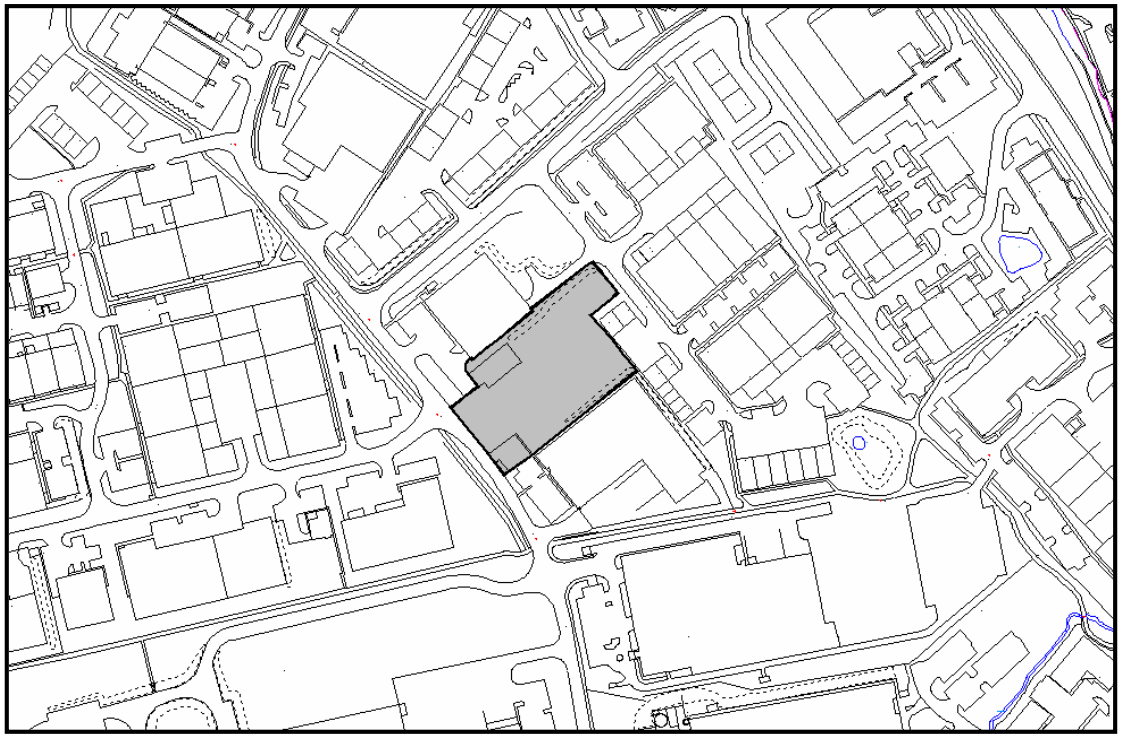
Historical reference: IN 59	Proposed new site reference: EL 08



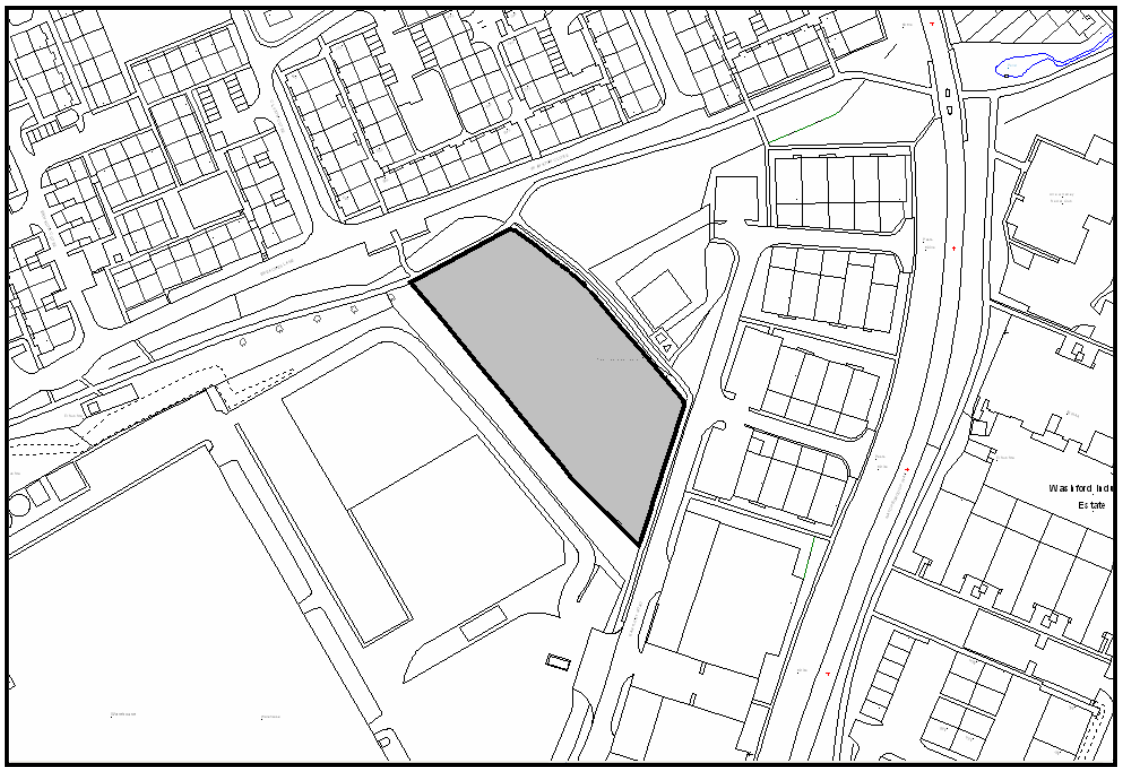
Historical reference: IN 24	Proposed new site reference: EL 09



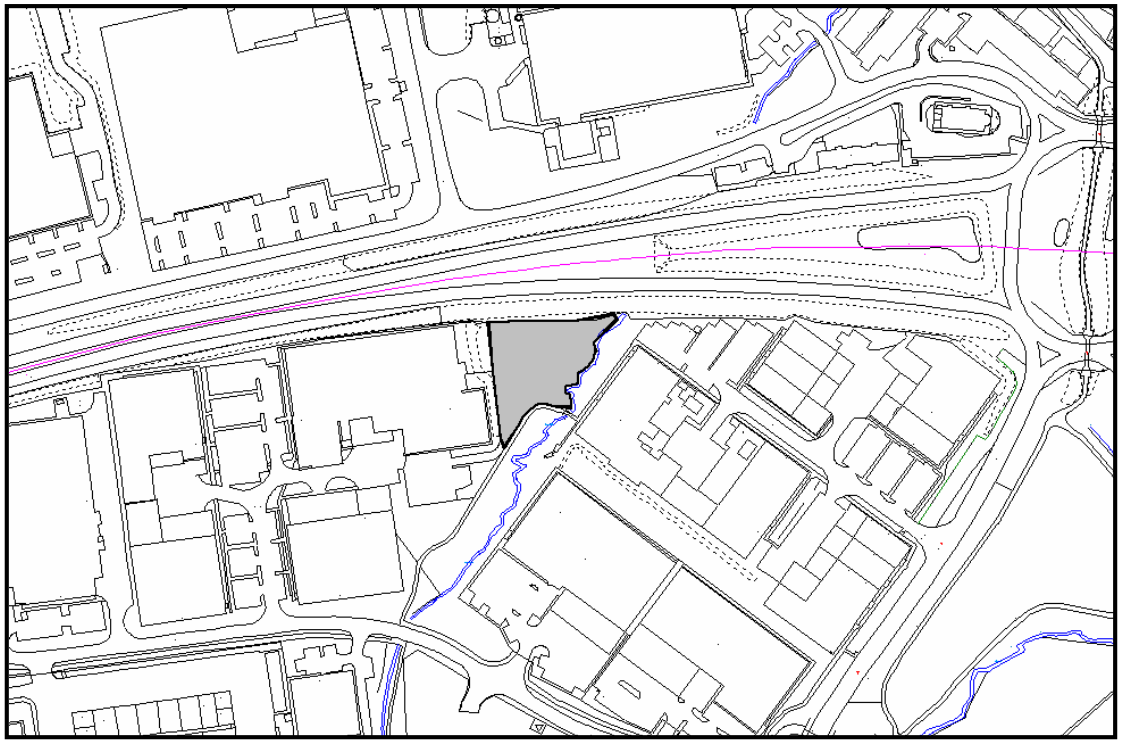
Historical reference: IN 34	Proposed new site reference: EL 10



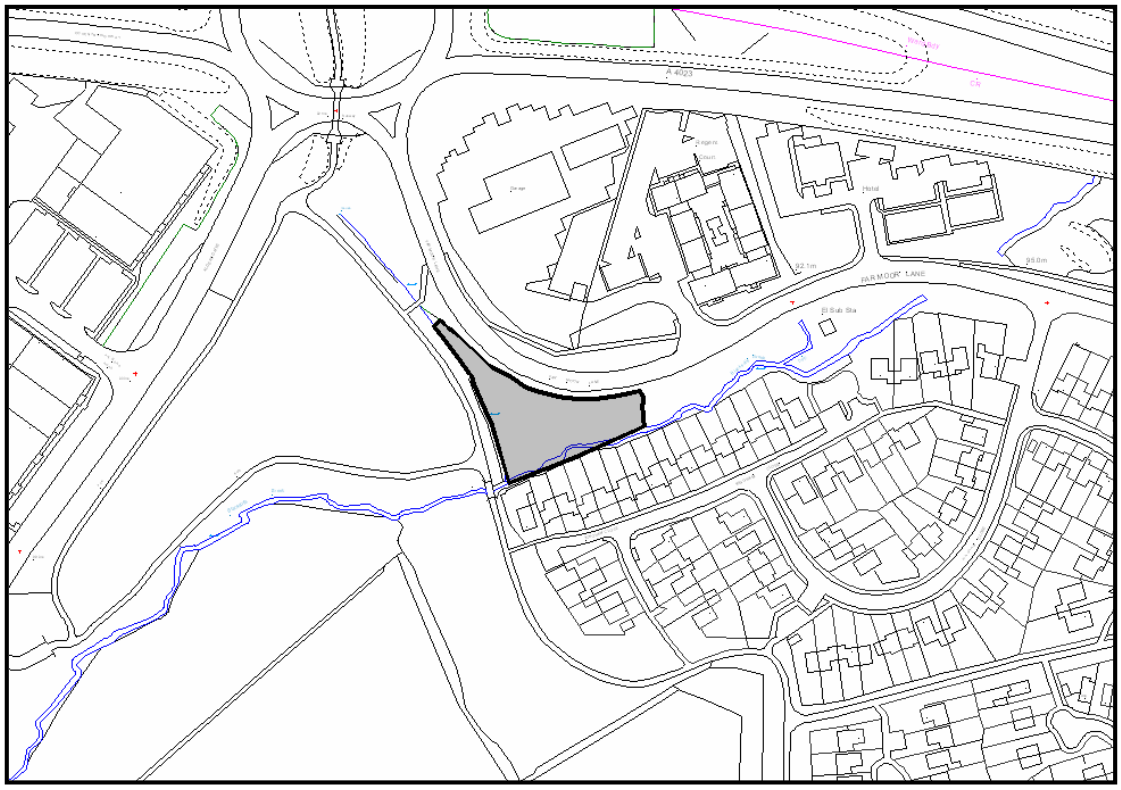
Historical reference: IN 37	Proposed new site reference: EL 11



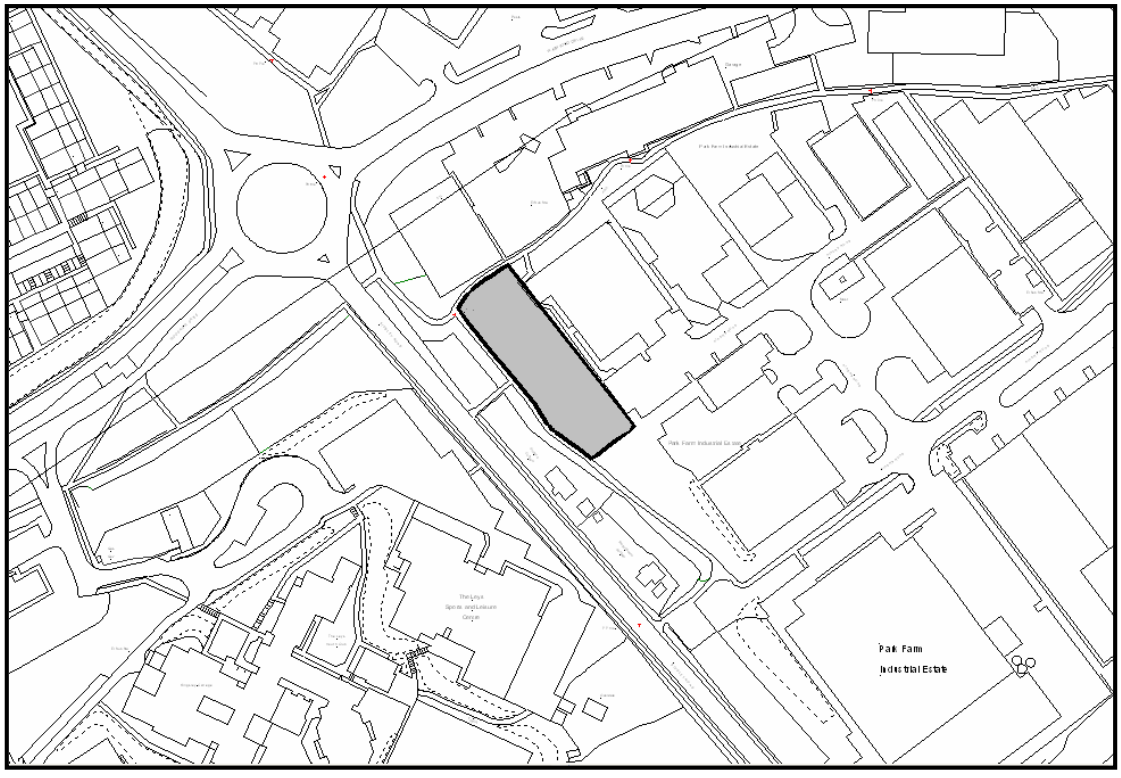
Historical reference: IN 54	Proposed new site reference: EL 12



Historical reference: UCS 7.5	Proposed new site reference: EL 13



Historical reference: UCS 9.19	Proposed new site reference: EL 14



Historical reference: UCS 9.58	Proposed new site reference: EL 15