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Walsall Council  
Civic Centre  
Darwall Street  
Walsall  
WS1 1TP

**Date:** 30 October 2018

**Our ref:** 42160/01/MW/CM/16655274v1

**Your ref:**

Dear Sir or Madam

## **Black Country Joint Core Strategy Review: Call for Sites Land at Clent View Road, Stourbridge**

We write on behalf of our client, Taylor Wimpey UK Limited, in response to the Black Country Joint Core Strategy Review [BCJCS] Call for Sites Consultation.

These representations are made in the context of Taylor Wimpey's interest in the land at Clent View Road, as indicated in the accompanying location plan (ref. 1273\_CP\_01 Rev B). The site has the potential to deliver up to 400 new dwellings, and is currently identified as Green Belt in the Adopted Development Plans of South Staffordshire and Dudley.

Taylor Wimpey welcomes the opportunity to discuss the Clent View Road Site with South Staffordshire, Dudley and the Black Country. It is considered to be an important deliverable site, and if promoted collaboratively, through the duty to cooperate, will deliver much needed housing to meet the needs of the Greater Birmingham HMA.

These representations support the removal of the site from the Green Belt and its allocation for residential development on the basis that:

- 1 It would assist in the delivery of sustainable development;
- 2 It does not fulfil Green Belt purposes; and,
- 3 There are no known constraints to its development and, it is deliverable in the next five years.

### **Sustainable Location**

The site comprises 19.6ha of largely open land within the Green Belt situated to the south-west of Stourbridge. The site is located primarily (16.5ha) within the local authority boundary of South Staffordshire District Council [SSDC], but is also partially (3.1ha) within the authority boundary of Dudley Metropolitan Borough Council [DMBC].

The site immediately abuts an established residential suburb of Stourbridge to the east, which is located within DMBC.

The site is bounded to the:

- 1 North by Westwood Avenue, beyond which lies a densely wooded area and agricultural land;

- 2 East by Roman Road which runs adjacent to Clent View Road, beyond which lies residential development comprising the western edge of Stourbridge;
- 3 South by a Public Right of Way and a line of mature trees, beyond which lies agricultural land; and to the south-west by a heavily wooded area; and
- 4 West by a line of trees extending from the northern boundary of the site to Frog Hall Cottages, which bound the site towards the centre west. The site is further bounded to the west by a heavily wooded area, and a further line of trees which joins the wooded area to the south-west of the site, beyond which lies agricultural land.
- 5 Roman Road runs adjacent to Clent View Road along the site's eastern boundary, and is separated from Clent View Road by a hedgerow to the east, and from the site by a hedgerow to the west.

The site is not within a Conservation Area, and there are no listed buildings within or around the site. The site is situated in Flood Zone 1.

The allocation of the site would assist in the delivery of sustainable development within both Dudley and South Staffordshire by making a significant contribution towards meeting the need for market and affordable housing.

Overall the site is considered to deliver economic, social and environmental gains in accordance with the National Planning Policy Framework (2018) [the Framework]. This is summarised below:

### *Economic*

The development of the site will provide a number of economic and fiscal benefits in terms of job creation and increased expenditure in the local economy both during and post development.

Housing supply also plays a key role in the flexibility of the local labour market which itself is an important component in local economic competitiveness. A shortage of housing or lack of affordability can act as a barrier to people accessing employment opportunities, or result in long distance commuting with adverse transport and environmental impacts. The development will assist in addressing this, and will also provide numerous construction benefits, seeking to use local construction firms and suppliers where possible to create jobs for the local economy.

Following completion of the development it is also expected that new residents will spend in the local area which will boost the local economy and sustain local jobs.

### *Social*

The development of the site will support the creation of a strong, vibrant and healthy community by increasing the supply of housing of a type and tenure to meet the needs of the area. It would provide a high quality built environment and complement the character of the surroundings. In particular, it will provide a suitable range of open market and affordable housing along with public open space for existing and future residents.

### *Environmental*

The site is currently in use for agricultural purposes and as such has limited ecological value. Although the proposed development will involve the loss of greenfield land, proposals will provide numerous compensatory improvements, and seek to retain, enhance or mitigate the existing ecological and environmental features of value on the site. Existing hedgerows and trees will be retained and incorporated within the proposed development where possible.

## **Green Belt Release**

In delivering sustainable development, the Framework attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence [§133]. The Framework states that before concluding that “exceptional circumstances” exist, the Council will be required to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development [§137]. This includes:

- 1 Making as much use as possible of suitable brownfield sites and underutilised land;
- 2 Optimising the density of developments; and
- 3 Discussions with neighbouring authorities to ascertain whether they could accommodate the identified need.

Taylor Wimpey considers that availability of land and the acute housing needs identified in the Black Country, Dudley, South Staffordshire and the wider Greater Birmingham HMA, demonstrates that “exceptional circumstances” exist to justify the release of the site from the Green Belt.

There are no other reasonable alternatives other than releasing Green Belt land to meet the housing needs of the Greater Birmingham HMA. The Framework indicates that when drawing up Green Belt boundaries, the Council should consider the need to promote a sustainable pattern of development, channelling development towards the urban area. Where Green Belt land is required for release, consideration should first be given to land which is previously developed and/or well served by public transport.

As set out in the preceding section, the development of the site would deliver the three dimensions of sustainable development as it performs a positive economic, social and environmental role in accordance with the Framework [§8]. The site is situated in a sustainable location and relates well to the urban area of Stourbridge. It also benefits from nearby shops, services and facilities and is within close proximity to the strategic road network and public transport links.

## **Green Belt Purposes**

The Framework [§134] identifies the 5 purposes that Green Belts serve. The following assessment considers the site against the five purposes of the Green Belt to establish its suitability for Green Belt release.

### **Purpose 1 - To check the unrestricted sprawl of large built up areas**

The site comprises a land parcel which is adjacent to the existing urban area. Several buildings bound parts of the site to the west (Frog Hall Cottages) and south-west (High Lodge Care Services). The site has a strong woodland boundary to the west, and is further bound to the north by an access road, and to the south by a line of mature trees and a wooded area.

These physical features provide strong, defensible boundaries to the north, south and west of the site. Therefore, the removal of the site from the Green Belt will not result in the unrestricted sprawl of the urban area.

### **Purpose 2 - To prevent neighbouring towns from merging into one another**

The site is not essential in preventing any neighbouring towns merging into one another. The site does not comprise an essential parcel of land that needs to be kept open for any strategic reason.

The future development of the site would not result in the narrowing of the gap nor would it result in merging of settlements.

### **Purpose 3 - To assist in safeguarding the countryside from encroachment**

The Clent View Road Site comprises a natural extension to the urban area, and represents a logical continuation of residential development on the edge of Stourbridge. As stated above, the woodland area to the west and south-west provide strong, established boundaries, and the site is bounded to the north by an access road and to the south by a line of mature trees.

The development would result in some encroachment into land which presently is countryside, though a sympathetic layout which respects the existing building line and reinforces site boundaries could assist in the integration of any future development of the land.

The removal of the site from the Green Belt does not affect the purpose of safeguarding the countryside from encroachment.

### **Purpose 4 - To preserve the setting and special character of historic towns**

The site does not affect the setting and special character of a Historic Town and therefore does not contravene this purpose

The removal of the site from the Green Belt does not affect the purpose of preserving the setting and special character of a historic town.

### **Purpose 5 - To assist urban regeneration by encouraging the recycling of derelict and other urban land**

The release of the Site from the Green Belt would not prevent the recycling of derelict land and other urban land within South Staffordshire or Dudley, as there is insufficient previously developed land available to meet future housing requirements.

The Black Country Issues and Options Core Strategy notes that there is significant housing need within the Black Country and the wider HMA, and the Greater Birmingham SGS concludes that a shortfall of up to 47,800 homes exists across the HMA to 2036. Therefore, there is a requirement for the identification of new sites on land outside the urban area that are not currently proposed for development. Land will need to be removed from the Green Belt and safeguarded from development to meet housing needs beyond the plan period.

More recently, the South Staffordshire Local Plan Review Issues and Options acknowledges the fact that the HMA Strategic Growth Study has been prepared and it identified a cumulative shortfall of 60,855 dwellings across the HMA to 2036. To identify possible options to meet this shortfall, the HMA Strategic Growth Study identified potential development options in the HMA. Consequently, South Staffordshire needs to have regards to the unmet needs arising from this HMA in setting its Local Housing Target in the Local Plan Review. There is significant pressure for South Staffordshire and Dudley to release additional land for housing to meet the shortfall.

In summary, the proposed allocation does not fulfil any strategic Green Belt function and its loss will not lead to any issues of coalescence. Removal of the land from the Green Belt, and its allocation for housing, will not harm any of the five purposes of the Green Belt set out in §134 of the Framework.

## **Deliverability**

Taylor Wimpey aims to create an attractive housing development with a distinctive character offering a choice of high quality new homes to meet local needs. The site has the potential to deliver up to 400 high quality new homes with a mix of housing types, tenure, and sizes. It would also deliver high quality, accessible, green space for the benefit of existing and future residents. Taylor Wimpey understands the local market and can deliver a high quality residential development within the first 5 years of the plan period.

The site is both deliverable and developable when considered against the definitions set out in the Framework.

## **Is the site available?**

The proposed allocation and development of the site:

- 1 Will make a valuable contribution towards meeting the quantitative and qualitative needs of the community for market and affordable housing. It could deliver up to 400 high quality family houses.
- 2 Is being promoted by a national housebuilder, Taylor Wimpey, who can deliver the proposed residential scheme. Taylor Wimpey is seeking to commence development as soon as the site is allocated.
- 3 Is not subject to any known constraints that would impede deliverability. There are no legal impediments, need for land in third party ownership. The site is therefore fully deliverable.

## **Is the site suitable?**

The site is located approximately 2.5 km south west of the centre of Stourbridge.

Within the adjoining residential suburb of Stourbridge, a Co-op convenience store is located within 0.3km of the site and Gig Mill Primary School is located 0.8km from the site. Stourbridge Town Centre lies around 2km from the site.

The site is well located in relation to the public transport network. There are several bus stops within 0.2km of the site which provide services into Stourbridge Town Centre, which provides a wide variety of essential services (Supermarkets, Crystal Leisure Centre, Ryemarket Shopping Centre, King Edward VI College etc.). The site is also situated within a 3km walking distance of Stourbridge Train Station (the 276 bus route provides a direct service to Stourbridge Train Station), which provides a regular shuttle service to Stourbridge Junction Train Station

Stourbridge is identified within the BCJCS Centres Key Diagram as a Town Centre. Stourbridge is therefore in the second highest tier of the settlement hierarchy below Brierley Hill, West Bromwich, Walsall and Wolverhampton. The provision of housing to maintain Stourbridge's role in the settlement hierarchy of Dudley and the wider Black Country is important.

The land also benefits from clear, well-defined boundaries and it is considered that its allocation and future development will not have a detrimental impact on the form and character of the settlement.

The allocation and development of the site provides an opportunity to create a long term defensible boundary to Stourbridge and the provision of housing development for the Greater Birmingham HMA.

## **Is the development achievable?**

The Framework states that for a site to be achievable there should be a reasonable prospect that housing will be delivered on the land within five years.

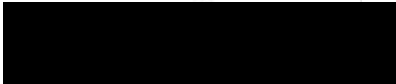
Taylor Wimpey has undertaken an evaluation of the technical and environmental constraints that could prevent or restrict the development of the land. This work has identified that there are no overriding constraints that will impede delivery.

### **Conclusion**

It has been demonstrated that land at Clent View Road, is a suitable and deliverable site for residential development and that it no longer fulfils the five purposes of the Green Belt as set out in the Framework. The development of the site accords with the principles of sustainable development. Taylor Wimpey is able to bring forward development at the earliest opportunity to assist meeting needs in Dudley, the Black Country, South Staffordshire and the Greater Birmingham HMA.

Should you have any questions or wish to discuss this Call for Sites application further please do not hesitate to contact me. Taylor Wimpey would welcome the opportunity to engage with both South Staffordshire, Dudley as part of the Black Country during the iterative process of the BCJCS Review and discuss its proposals for the site at the appropriate time.

Yours sincerely



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Brigid Dodds: Strategic Land and Planning Manager – Taylor Wimpey Strategic Land (Cannock)