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19 August 2020

EP ref: 18-133

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Dear Sir / Madam

Re: 2020 Call for Sites- Land at Vicarage Road, High Heath (site ref: 279)

We write in respect of the land at Vicarage Road / Coronation Road, High Heath, which we are promoting on behalf of HIMOR (Land) Ltd. A site location plan is enclosed at Appendix **EP1**. This letter provides an update to the previous call for sites submission by HIMOR, and the information held in respect of site 279 should be updated accordingly.

The Black Country Urban Capacity Study Update 2019 identifies a significant shortfall of housing across the plan area to 2038, of some 27,000 homes. The shortfall in Walsall alone equates to approximately 9,500 dwellings. The site can play a significant role in addressing this very substantial shortfall.

The proposed developable site area comprises approximately 14 hectares, presently used for agriculture (grazing). It is located to the north of Vicarage Road. Initial assessments indicate that the site could accommodate in the region of 350 dwellings based on a gross density of 25 dwellings per hectare; however, there is the potential option of including land to the east within an allocation should the Council wish to consider options to deliver a higher quantum of development.

We submitted a wider site to the 2018 Call for Sites, which included land to the east, under reference 279 on the BCCS Call for Sites mapping. The purpose of this submission is to revise the propose site allocation area to reflect the land under HIMOR's control, address the sections in the Council's



current call for sites system where no information is currently set out, and we also comment upon the Council's emerging evidence base documents where relevant to the site.

Call for sites information

We hereby provide information to supplement that previously provided in relation to site reference 279, specifically to address aspects of the proposal where information is currently not provided on the Council's system or the information previously provided requires updating. Unless specified here, all other information on the Council's form for site 279 remains applicable and does not need to be edited.

What is your / your client's interest in this site?

HIMOR is a strategic land promoter. An agreement has been reached with the landowner to promote the site.

Site Area in hectares

The total site area under the control of HIMOR is 21 hectares. This is shown on the plan at Appendix **EP1**. Please note that this is a revision to the site area currently shown for site 279, and the call for sites mapping should be updated to reflect this.

Site Area in hectares of land suitable for development, if different to above

The total developable area is approximately 14 hectares. This comprises the western sections of the land controlled by HIMOR, and excludes the three fields to the north-east. However, the site could form part of a wider allocation to include the land north of Mop Lane (site ref: 266), in which case the residual 7 hectares under HIMOR's control (i.e. the north-eastern fields shown at Appendix **EP1**) could also be logically developed / form part of an allocation.

What use or mix of uses do you propose for this site?

The site is promoted for residential development. Other ancillary uses, such as employment or retail, could be accommodated as part of the proposals, subject to the Council's requirements.

What services are currently available at this site?

We understand that all local services and infrastructure, including electricity, mains gas, foul sewers and telecommunications infrastructure are available.

What constraints, if any, affect this site?

HIMOR has undertaken initial technical assessments, including access and highways capacity. These indicate that there are no significant technical constraints to the site coming forward.

What new infrastructure do you think will be required to support the development of the site?

This depends upon the scale of allocation proposed. Infrastructure provision required in association with a development for 350 dwellings could include POS, footpaths and cycleways. Matters such as health and education provision would need to be reviewed further in association with other planned developments.

Is there any current market interest in the site, other than from you / your client?

Yes. HIMOR is an experienced land promotion company that has a track record of bringing sites to the market immediately following the granting of outline planning permission. HIMOR is aware of strong market interest in this area from developers and anticipates no issues in quickly disposing of the site to a developer(s).

Other evidence documents relating to the site

A series of evidence documents have been published on the Council's website. Whilst comments are not specifically invited upon these documents, at Regulation 18 stage it is important that interested parties are able to comment upon aspects of the evidence base, as part of an iterative process of engagement. The documents are clearly of relevance to the Council's consideration of sites. We therefore comment on the documents below insofar as they relate to the subject site.

Back Country Green Belt Study (GBS)

The site is located within sub-parcel B105As2 as identified within the GBS. The overall conclusion is that the parcel receives a harm rating of 'high' (if developed). The assessment states:

"The sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation, to maintaining the separation of the neighbouring towns, and to preventing encroachment on the countryside. However, the edge of the High Heath area of Sheffield forms a weaker distinction between settlement and countryside than is the case along other urban edges fronting onto this sub-parcel, and is contained to the west by woodland; limited expansion here would constitute slightly less harm to Green Belt purposes."

We do not agree that the sub-parcel makes a strong contribution to "maintaining the separation of the neighbouring towns". Clayhanger is a considerable distance to the north, and the land is separated from Pelsall by a very significant area of woodland around Ford Brook. There would be no physical or perceived merging of settlements if the sub-parcel, or parts thereof, were the site to be developed. The woodland around Ford Brook provides a considerable and strong natural boundary, which is also relevant to the contribution that the site makes to preventing sprawl and encroachment. Other than an access road to serve the proposed allocation, the developable area would not introduce development any further west of the existing urban form due to flood zone.

It should also be noted that there are potential options to develop parts of the site within the sub-parcel, using the natural features within the suite to create strong boundaries. We intend to put these forward as part of the masterplan that we are developing for the site.

Furthermore, whilst we acknowledge that the GBA cannot be expected to take into account specific development proposals and potential mitigation (including compensatory Green Belt enhancements), clearly that can be considered by the Council in the preparation of its plan. Such measures must inform the overall assessment of harm to the Green Belt. In this case, the land controlled by HIMOR is extensive and has the potential to provide significant areas for ecological enhancement and recreational use. We are currently working on a revised masterplan for the site which will set out ways in which significant Green Belt compensatory measures could be delivered, in accordance with the National Planning Policy Framework.

Black Country Landscape Sensitivity Assessment (LSA)

The site forms part of parcel BL35 in the LSA, which is assessed as being of moderate landscape sensitivity. It should be noted that this parcel is much wider than the proposed allocation of HIMOR's land, which adjoins the existing urban area and is well contained by the existing watercourse and woodland to the north-west.

Ecological Evaluation of the Black Country Green Belt (EE)

Figure 9 of the EE indicates that HIMOR's land mainly comprises 'medium-low' ecological value. This accords with HIMOR's own survey work, the results of which are provided at Appendix **EP2**. There are no significant ecological constraints to the site being developed, and there is ample land being promoted to provide mitigation (if required) and assist in delivering a net gain in biodiversity.

Conclusions

The site represents a very logical choice for an allocation for development in the emerging plan. It is deliverable and can contribute to meeting the identified development needs of the Black Country in a sustainable way.

We are currently in the process of developing a masterplan for the development of the site, which we intend to submit later this year. This will set out options for how the site can be delivered, including the land controlled by HIMOR, and a potential wider urban extension which includes the land to the east.

Should you have any queries or require any additional information in advance of us submitting the further masterplan, please do not hesitate to contact us.

Yours sincerely
Emery Planning

John Coxon BSc (Hons), MRTPI
Director

Enc: **EP1** – Site location plan
 EP2 – Results of ecological walkover survey

Cc: Simon Tranter, Walsall Council
 Client