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Dear Sir/Madam

BLACK COUNTRY PLAN CALL FOR SITES

LAND TO THE NORTH AND SOUTH OF THE B4176, HIMLEY

Harris Lamb Property Consultancy (HLPC) is instructed by Clowes Developments (UK) Ltd (Clowes) to submit their site to the Black Country Plan Call for Sites. Clowes have land interests both within and adjoining the Black Country administrative area that we believe are suitable to meet the housing and employment land requirements of the Black Country in the emerging Black Country Plan.

This representation specifically refers to land interests to the North and South of the B4176, on the outskirts of the village of Himley. A site location plan is attached for your information. Whilst the site is located within South Staffordshire, it could potentially form part of a larger development which would adjoin the Black Country urban area. Clowes are promoting the site for residential development in association with a proposed 71.2 hectare strategic employment site located on Land at Wall Heath, to the south of the subject site, immediately adjacent to the built-up edge of Dudley Metropolitan Borough. An indicative site plan (Ref.3533-SK03) accompanies these representations, which demonstrates how the site, in association with the Land at Wall Heath, could be included in the emerging plan as a residential allocation. The site is deliverable, it is in a highly sustainable location, and would contribute to the supply of housing in the Black Country in the short term.

The site currently lies within the Green Belt; however, as acknowledged by the Black Country Urban Capacity Review (May 2018 and December 2019) a Green Belt review and subsequent release of Green Belt land will be necessary in order to meet unmet housing and employment needs of the Black Country and neighbouring authorities. The Black Country Green Belt Study Stage 1 and Stage 2 Report was published in September 2019, however the site sits outside of the study area. Regardless, due to the surrounding urbanised context of the site and clear defensible boundaries, it is our opinion that the site performs a limited Green Belt role, which will be established following further assessment.

The Black Country authorities are in a position of relying upon other authorities within the Greater Birmingham Housing Market Area (HMA) to deliver a significant amount of housing to help meet their growth requirements. The Black Country Core Strategy (BCCS) is in the process of being replaced by the Black Country Plan. The Issues and Options consultation was undertaken on the emerging replacement Plan in July and September 2017. The consultation document advised that 78,000 dwellings are required between 2014 and 2036 in order to meet the growth requirements of the Black Country (3,545 dpa). However, this figure will need to be revised upward in subsequent versions of the Plan.

The Issues and Options consultation document was published before the revisions to the PPG that required the application of the 2014 household projections in the Standard Method calculation. If the updated guidance on the Standard Method calculation is used it results in a housing requirement of 3,761 dwellings for the Black Country, the equivalent of 8,742 dwellings during the Plan period. There are also a series of changes proposed to the Standard Method, which have been proposed in the recently published Planning White Paper (August 2020). As currently drafted, the new Standard Method would result in an uplift to the housing requirement for the Midlands by close to 40%.

The Issues and Options consultation draft for the Black Country Plan estimates that sites within the urban area could deliver 56,000 dwellings. However, in order to achieve this all sites currently being built out and sites with planning permission will need to be delivered as expected and other sites will need to come forward with increased densities. This leaves a shortfall of approximately 22,000 dwellings that need to be provided outside of the urban area. This shortfall will need to be accommodated on land within the Green Belt within the Black Country and neighbouring authorities. However, Green Belt development opportunities within the Black Country are highly limited. In addition, it is highly unlikely all identified SHLAA sites will be found to be deliverable or capable of allocation and the density assumptions within the Black Country Plan are extremely ambitious. The 22,000 dwelling shortfall identified therefore represents a robust, conservative starting point for understanding the combined housing shortfall of the conurbation.

The emerging plan should be prepared to be flexible and to facilitate the prompt delivery of available housing and employment sites. In order to achieve this, the Black Country Authorities will need to liaise with the neighbouring Local Authority areas, and in particular South Staffordshire to ensure that sites are allocated for development in sustainable locations that can deliver development promptly. In order to achieve this, a range of different sites should be identified for development in a number of different locations in order to provide choice and competition in the market for land and to enable the significant housing and employment land requirements can be met.

Our clients Land to the North and South of The B4176, Himley presents the opportunity to contribute to the housing requirements of the Black Country during the course of the emerging plan period. It has no known technical or environmental constraints and is considered deliverable in the short term. We therefore welcome its assessment for its suitability as a strategic housing allocation in the emerging Black Country Plan.

We trust that we have provided sufficient information to assess the suitability of the site for inclusion within the emerging plan, however, please do not hesitate to contact me should you require any additional information or wish to discuss the site further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Sean Rooney', with a stylized flourish at the end.

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