



Dear Sir / Madam

**Dudley Local Plan Regulation 18/Preferred Options Consultation
Response by Clowes Developments (UK) Ltd.**

Harris Lamb Planning Consultancy are instructed by Clowes Developments (UK) Ltd, hereto referred to as Clowes, to submit representations to the Dudley Local Plan Regulation 18 Preferred Options and welcome the opportunity to comment at this time. Clowes are currently promoting sites in South Staffordshire on the edge of the Black Country conurbation at Kingswinford. This representation focuses on their site, available now for employment development, alongside the A491 to the north of Wall Heath (please see Figure 1 below for the indicative masterplan). Consequently, this representation sets out the employment aspects of the draft plan, the acknowledged significant requirement for land outside of Dudley to meet the employment need that has been identified and the importance of meaningful discussions with those nearby local planning authorities (LPAs) who have appropriate availability to assist with meeting this need.

A Substantial Shortfall and Need to Find a Definitive Solution

The draft plan identifies a shortfall of 47 hectares (ha) of employment land, before the projected loss of 26 ha of employment land is accounted for. This is a substantial amount of land and represents a large number of jobs for local people that have yet to be accounted for.

Clowes would like to urge Dudley Metropolitan Borough Council, hereto referred to as the Council, to enter constructive and productive discussions with nearby local authorities who have the capacity to assist in meeting this shortfall; with South Staffordshire being the top of the list due to its immediate proximity to Dudley and the existing strong functional relationship with the Borough. None of the other Black Country LPAs nor Birmingham City purport to have the land available to meet their own needs and any land that might be identified within these to assist other LPAs, as their Local Plans progress will barely scratch the surface of the level of employment land needed. Consequently, it will be necessary to engage positively with the LPAs immediately beyond the Black Country Functional Economic Market Area (FEMA), including South Staffordshire, to meet this need.

rather than general manufacturing which is the principal type of employment at Wall Heath / Kingswinford.

In looking to address the employment need, Clowes would encourage Dudley to look at sites to the west of the Borough. They would also encourage Dudley to identify that which strengthen the offer for small and medium sized local and regional firms for an integral part of the local economy and supply chain. Sites which are well connected and back the prospective employees and the existing employment sites in the conurbation.

Land at Wall Heath

Clowes have previously submitted a Vision Document and representations in support of the employment allocation of their site at Wall Heath. The site extends to 71.2 hectares and the indicative masterplan in Figure 1 above demonstrates how a range of Use Classes B1, B2 and B8 could be delivered on the site with a combined floor area of 84,844 square metres.

The site is deliverable, is located on the edge of conurbation and one of the closest sites with the potential to deliver a meaningful contribution to the unmet employment need in Dudley. It would provide the perfect opportunity for local and regional companies to locate and would build on the success of the Pensnett Trading Estate which is 3km to the east and has a spare capacity of 4%.

Clowes consider this site would provide an ideal location to assist with meeting the needs identified by Dudley and would very much welcome the opportunity to work with Dudley and South Staffordshire Councils to make this a reality, thereby delivering much needed jobs for local people.

The Draft Plan

We now set out our comments on the draft plan. For ease of reference, the comments are presented for each chapter / paragraph in turn and follow the order that they appear in the draft plan.

Paragraph 3.2 – Clowes agree that “it is essential to take account of the wider context of the West Midlands Region”.

Paragraph 3.8 – Clowes support aspiration 5 which states “. . . *innovative and prosperous businesses, operating in high quality locations with space to grow*”. HL contend that there is very little opportunity to grow, in particular at Pensnett Trading Estate, due to a contention of neighbouring land uses and historically low availability.

Paragraph 3.12 states that “The council has been working collaboratively with neighbouring authorities on cross boundary issues for a number of years and will continue to do so as the Dudley Local Plan progresses through to publication stage and adoption”. Clowes contend that the combination of a significant shortfall in the proposed supply and a lack of expansion capacity means that Dudley needs to secure an agreement with South Staffordshire District Council (SSDC) regarding new employment land on the edge of the conurbation.

Table 3.3 – Clowes agree that “the Plan should provide for a range of employment sites capable of meeting a wide variety of investment needs”. Clowes contend that many local businesses depend on local labour. In order to provide opportunities for these to grow new employment sites on the edge of the conurbation in South Staffordshire need to be identified.

Policy DLP1 Development Strategy

Part b – It states “Deliver the development of at least 25ha of employment land”. The employment land need / requirement is 98ha (includes 26ha employment land predicted to be ‘lost’ to other land uses) so there is a substantial and significant shortfall of 73ha.

Table 5.1 – It states that the shortfall is “to be exported through Duty to Cooperate”. It was evident that the now discontinued Black Country Plan had also had a significant employment land supply shortfall. Therefore, it is clear that Dudley will need to cooperate with Councils beyond the Black Country Functional Economic Market Area (FEMA), but which have a strong geographical and functional relationship with Dudley, for example South Staffordshire District.

Paragraph 5.11 – Clowes agree that “there is a shortage of deliverable sites identified”. Outstanding development needs are to be addressed via the Duty to Cooperate. HL considers it should be made explicit which “other relevant local authorities” can realistically deliver a significant quantum of employment development which will be of benefit to employers and employees in Dudley Borough.

Paragraph 5.13 – It is evident that the substantive and significant unmet employment need will have to be largely delivered beyond the FEMA in local authority areas which have a functional relationship with Dudley e.g. South Staffordshire where there is a strong commuting pattern.

Policy DLP2 – Clowes do not object to the proposed Regeneration Corridors being the primary focus for new development but, as stated in the policy, will not deliver the outstanding employment land requirement. Pensnett Trading Estate (PTE) is one of the “strategic employment areas” within a proposed Regeneration Corridor which extends towards South Staffordshire. Pensnett however has less than 5% spare capacity meaning there is very limited flexibility for growing businesses and redevelopment opportunities. Clowes’ site is only 3km from the centre of PTE, via the A491 and B4175.

Table 5.3 Regeneration Corridors – The Vision to 2041 includes “encouraging investment in Pensnett Trading Estate but due to the surrounding land uses and barriers investment will be limited to redevelopment opportunities. Those will however be limited given the ongoing high occupancy rate, currently 96%. The Clowes’ site is only 3km away and would facilitate growing businesses on Pensnett Trading Estate.

Paragraph 9.6a – Clowes agree that South Staffordshire has strong employment and labour market links to the Black Country. The Clowes’ site, being on the A491 / Wolverhampton Road has a particularly strong geographical and functional link with Dudley Borough at Wall Heath.

Paragraph 9.6h – Clowes agree that “there is a significant gap between the employment land supply”.

Policy DLP18, I.c. – Clowes support that Dudley will seek to deliver “the development of employment sites outside of the Borough, which have an evidenced functional economic link to Dudley Borough”. The Clowes’ site clearly can demonstrate a functional economic link to Dudley Borough.

4. – This states that “the Council will support the regeneration and renewal of Strategic Employment Areas”. Clowes contend that the Pensnett SEA will be able to better realise redevelopment opportunities if local employers can relocate locally thereby retaining local labour.

Paragraph 9.16, Figure 9.1 – Clowes consider that the diagram clearly shows South Staffordshire to be one of only 2 local authority areas, the other one being Birmingham which cannot meet its own identified employment need, which have a strong functional relationship with the Black Country.

Paragraph 9.19 – Clowes note that Stantec consider that 14ha, at the West Midlands Strategic Rail Freight Interchange in South Staffordshire, can be considered as contributing towards Dudley's outstanding needs. That however is for a specific type of employment i.e. logistics / distribution whereas the Clowes' site would be manufacturing related, similar to that at Pensnett.

Paragraph 9.20 – Clowes support the logic, regarding the “chain” of employment land and premises and the renewal and rejuvenation areas. These opportunities will be more readily realised if there is other local land e.g. the Clowes' site where local businesses can continue to grow.

Transport and Movement Key Diagram– Clowes support the proposed Kingswinford / Pensnett railway walk which evidently will improve the functional link between the Clowes' s Site, Pensnett Trading Estate and the services in Kingswinford.

Summary

There is a significant shortfall in employment land in the Dudley Regulation 18 Preferred Options Local Plan. It is evident that Dudley MBC need to engage positively with South Staffordshire District Council and identify suitable employment sites which will deliver benefits for both economies. In short, the Clowes' Site represents jobs for local people and is important for bolstering the strength of the local economy for the benefit of all. Not providing this land will have a negative impact on local people and it is the local people who will suffer if a solution cannot be found.

Clear and decisive action is needed to ensure these needs are met and the starting point should be discussions with South Staffordshire to urge them, under the statutory Duty to Cooperate, to provide appropriate land needed to deliver these jobs.

We trust you take our comments into consideration, and we look forward to being notified of further stages of consultation on the review of the Dudley Local Plan. If you have any questions or need to discuss, please do not hesitate to contact me.