Draft Dudley Local Plan

Representations to the Regulation 19 Consultation

Land at Clent View Road, Stourbridge

Taylor Wimpey Strategic Land (West Midlands)

27 November 2024

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1.0 Introduction

1.1 These representations to the Draft Dudley Local Plan ("the DLP") Regulation 19 Consultation have been prepared by Lichfields on behalf of Taylor Wimpey UK Limited ("Taylor Wimpey"). We focus on the strategic matters that are contained within the consultation and relate specifically to Taylor Wimpey's site entitled Land at Clent View Road, Stourbridge ("the Site").

1.2 Taylor Wimpey seeks to work constructively with Dudley Council ("the Council") as it progresses towards the submission and adoption of the Local Plan Review and trusts that the comments contained within this document will assist Officers in this regard.

Land at Clent View Road, Stourbridge

1.3 A Vision Document (Appendix 2) has been submitted alongside these representations to support the proposals for residential development at Land at Clent View Road, Stourbridge. The Site lies within the Green Belt and is located immediately adjacent to the urban area. The site is comprised of greenfield land. It should be noted that no part of the site is covered by any statutory ecological site designations. A site Location Plan is included as Appendix 1.

1.4 The site is accessible to existing community and social facilities with public transport links available within walking distance of the proposed development. The site is situated is situated 0.4km from Shenstone Avenue bus stop, which provides regular services to the centre of Stourbridge and Dudley. Stourbridge Junction rail station is located approximately 3km from the proposed site and provides regular services to nearby and well-connected stations including Birmingham New Street, Kidderminster, Solihull, Worcester Shrub Hill, and Stratford -Upon-Avon.

Plan-Making to Date

1.5 The existing development plan for Dudley comprises the following documents:

- The Black Country Core Strategy (adopted February 2011);
- Dudley Borough Development Strategy (adopted February 2017);
- Brierley Hill Area Action Plan (adopted August 2011);
- Dudley Area Action Plan (adopted February 2017);
- Halesowen Area Action Plan (adopted October 2013);
- Stourbridge Area Action Plan (adopted October 2013)

1.6 Previously, the four Black Country Planning Authorities (Walsall, Dudley, Sandwell and Wolverhampton) were in the process of undertaking a review of the Black Country Core Strategy. As per NPPF paragraph 33, "*Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy*".

1.7 The Black Country Authorities (BCAs) carried out an Issues and Options consultation ("IOC") between 3rd July and 8th September 2017. Following on from this, the BCAs consulted upon the Draft Black Country Plan Consultation between 16th August to 11th October 2021. The draft plan considered a range of issues, including the amount of housing and employment land needed within the Black Country up to 2039. Other topics included, inter alia, infrastructure provision, health and wellbeing and the natural and historic environment.

1.8 However, it was announced in October 2022 that the Councils had failed to reach a consensus on the approach and therefore each Council is now preparing their own Local Plan. Subsequently, Dudley is in the process of preparing a new local plan, known as the Dudley Local Plan 2041. The Local Plan Review is required to review, inter alia, the housing and employment needs of Dudley.

1.9 The Council undertook an issues and options consultation which concluded in December 2023 where the draft plan considered proposed development allocations, the distribution throughout Dudley and a range of draft policies on topics such as infrastructure, housing provision, the environment, climate change, and transport. The Council is now undertaking a consultation on the publication version of the Draft Dudley Local Plan (Regulation 19) which will run up until 29th November 2024.

2.0 Areas of Response

Spatial Strategy Policies

Draft Policy DLP1 (Development Strategy)

2.1 Taylor Wimpey **objects** to draft Policy DLP1 as the strategy does not meet its housing need in full and is proposing to export its shortfall to neighbouring authorities within the GBBCHMA. As part of the regulation 19 Local Plan, the housing requirement has been amended from 10,876 dwellings to 10,470 dwellings in the plan period against a Local Housing Need ("LHN") of 11,169, it still results in a shortfall.

2.2 The reason for the shortfall is as a result of the Council pursuing a brownfield led strategy with 97% of the housing requirement to be delivered in this form. Although Taylor Wimpey agrees its appropriate to seek to redevelop brownfield land first in accordance with the NPPF, however, there is clearly a shortfall in available supply and by pursuing one strategy in isolation, this housing need cannot be met, instead it is considered that a mix of brownfield and greenfield/Green Belt land is necessary to meet the Council's housing needs.

2.3 Furthermore, the proposed housing need is based upon the standard method (SM) within the adopted NPPF, however, the DLP has not acknowledged the proposed NPPF changes, in particular the revised SM in which the local housing need for Dudley would substantially increase by 143%. It is likely the draft NPPF will be published prior to the DLP reaching examination; therefore, it is critical the Council identify further land at this stage of the local plan production to meet the increased housing need from the new SM.

2.4 In addition to the unmet need arising from the revised SM, there is a considerable shortfall in committed contributions towards the unmet needs of the GBBCHMA. Given the urban constrained nature of the authorities within the GBBCHMA, it is considered Dudley can support the neighbouring authorities to maximise housing land supply in its own authority by utilising suitable, available and achievable land located in the Green Belt.

2.5 NPPF paragraph 69 requires the local plan to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability to deliver specific deliverable sites within the early years of the plan period which has not been demonstrated within the DLP.

2.6 Taylor Wimpey considers the Council should review land within the Green Belt to meet their LHN and considers exceptional circumstances exist considering the existing unmet needs and the increasing unmet need from the revised SM approach as well as providing a contribution to the GBBCHMA shortfall.

2.7 Not only is this approach to the development strategy fundamentally flawed and entirely contrary to the requirement of NPPF paragraph 35(c), but it is completely misaligned with "*the Government's objective of significantly boosting the supply of homes*" (NPPF paragraph 60).

2.8 In this regard, Taylor Wimpey considers that the DLP's approach through draft Policy DLP1 is flawed and unsound on several grounds, and these are summarised below:

1. **Local Housing Need**: The Council has not assessed whether a housing requirement greater than the LHN is justified.
2. **Changes to the Standard Method and NPPF**: The Council does not acknowledge the draft NPPF and the changes in national policy on plan-making.
3. **GBBCHMA Unmet Needs**: The DLP fails to acknowledge the unmet housing need arising from the Greater Birmingham and Black Country Housing Market Area [GBBCHMA] when seeking to export Dudley's housing shortfall.
4. **Duty to Cooperate**: The Duty to Cooperate has not been fulfilled and the unmet housing need identified has been deferred rather than dealt with, contrary to NPPF paragraph 35(c).
5. **Sustainability Appraisal**: The Draft Sustainability Appraisal fails to consider all of the options available to meet the LHN as well as the GBBCHMA's unmet need, and therefore would not be justified as per NPPF paragraph 35(b).
6. **The Deliverability of Brownfield Land**: The proposed supply of brownfield land and windfall sites is an unrealistic and unviable strategy. In reality, the shortfall of housing land is greater than what has been stated within the DLP.
7. **Transitional Arrangements of the Draft NPPF**: Based on the current arrangements, it is considered unlikely that the DLP will proceed through examination.
8. **Exceptional Circumstances and Green Belt Release**: The DLP does not seek to identify, allocate and release a sufficient supply of land within the Green Belt for housing. The DLP does not recognise that exceptional circumstances for the release of land from the Green Belt exist.

2.9 Taylor Wimpey's detailed objections in relation to the above grounds are set out below:

Local Housing Need

2.10 The DLP's proposed housing requirement across the plan period is 10,470 dwellings against a LHN of 11,169 dwellings, leaving a shortfall of 699 dwellings which will be delivered via neighbouring authorities via the Duty to Cooperate.

2.11 Whilst the LHN has reduced from 11,954 dwellings to 11,169 dwellings since the regulation 18 consultation due to a reduction in affordability, however, the housing requirement has also been reduced from 10,876 dwellings to 10,470 dwellings with no justification for the reduction. Considering the reduction in housing need is 785 dwellings, it is unclear why this has not been met via the housing supply previously identified within the regulation 18 document.

2.12 Taylor Wimpey maintains its position from the issue and options representations that draft Policy DLP1 should set out whether a housing requirement greater than the minimum LHN is justified and demonstrates the LHN will not be met in the plan period. In this regard, consideration should be given to NPPF para 11b which states;

"*Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

1 *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

2 *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*"

2.13 The NPPF also states that:

"*To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance…*" (Para 61)

2.14 Taylor Wimpey welcomes the Council's acknowledgement of Dudley's minimum LHN figure, however, consider it unjustified and contrary to planning guidance to deliver a housing requirement which disregards meeting its LHN in its entirety. The PPG[1] is clear that the LHN figure generated by the SM method is a minimum starting point (i.e. actual housing need may be higher than this figure). In this respect, the Council's position is unsound and would be contrary to national policy.

2.15 Taylor Wimpey strongly encourages the Council to identify further land supply to meet the minimum requirement via exploring a different development strategy that doesn't depend entirely on its brownfield land supply.

2.16 Draft Policy DLP1 (3) aims to export the 699 dwelling shortfall to neighbouring authorities and demonstrates in Table 1 of the DLP the potential (unconfirmed) contributions to the Black Country Authorities and GBBCHMA as follows.

Table 2.1 Summary of Direct Contributions to the GBBCHMA's Housing Shortfall

Local Authority	Contribution	Status of Plan	Statement of Common Ground (SoCG)	Potential contribution towards Dudley's shortfall
Shropshire	1,500 to BCA	Examination in Public	SoCG signed in July 2021 and addendum signed in September 2024	Potential appointment of 431 homes to Dudley. Subject to formal agreement/SoCG between BCAs.
South Staffordshire	640 to GBBCHMA	Regulation 19	Updated bilateral SoCG agreed and subject to formal sign off via Dudley MBC's Cabinet 23rd October 2024.	Potential appointment of 153 homes to Dudley. Subject to formal agreement/SoCG between BCAs and Birmingham City Council.
Telford & Wrekin	1,640 to BCA	Regulation 18	SoCG to be progressed as part of the GBBC HMA	Potential appointment of 242 homes to Dudley. Subject to formal agreement/SoCG between BCAs and Telford & Wrekin.

[1] PPG ID: 2a-002

Cannock Chase	500 to BCA	Regulation 19	SoCG to be progressed as part of the GBBC HMA	Potential apportionment of 16 homes to Dudley. Subject to formal agreement/SoCG between BCAs and Birmingham City Council.

Source: Dudley's Spatial Strategy Development Table 1

2.17 The position adopted by the Council is not based upon any agreed position with neighbouring local planning authorities and is fundamentally flawed and unsound.

2.18 There is significant concern on the validity of these contributions being met to support Dudley with its shortfall noting the current status of both the Shropshire Local Plan and the Stafford Local Plan. Stafford have had their local plan paused since 2020 and limited developments have occurred in this timeframe.

2.19 Meanwhile, the Inspectors for the Shropshire Local Plan Examination issued a letter on the 29th October 2024 announcing the examination has been paused following significant concerns about the soundness of the Plan in respect of a number of areas. Given the protracted nature of proceedings to date, Taylor Wimpey consider withdrawal is likely, as such, the 431 dwellings are unable to be delivered in the short term.

2.20 Given this update, it is considered likely that the potential 431 dwellings contribution will not be delivered meaning the level of contribution from neighbouring authorities currently stands at 411 dwellings, leaving an unidentified shortfall of 288 dwellings.

2.21 Nevertheless, although the neighbouring authorities have made reference to supporting the GBBCHMA, Taylor Wimpey still strongly considers the DLP should meet its LHN in its entirety given the GBBCHMA is struggling to meet unmet housing need due to the constrained urban nature of the authorities. It is considered that the unmet need of the GBBCHMA should be addressed through cooperation and suitable planning, however, the DLP is disrupting the function of the HMA by exporting 699 dwellings of its own needs onto them rather than maximise housing growth within Dudley and identifying sustainable land to help reduce the severe shortfall.

2.22 The DLP does not state why it is unable to accommodate Dudley's identified shortfall or the reasons for not assessing alternative options capable of accommodating a greater level of housing. Although paragraph 5.11 of the DLP admits "*there is a shortage of deliverable sites identified*", the Council has proposed a predominantly brownfield-led spatial strategy with minimal greenfield development. As identified, this results in a shortfall of housing that the Council aims to export to neighbouring authorities. Taylor Wimpey considers this approach to be unjustified and unreasonable as it relies on neighbouring authorities increasing their level of supply, effectively seeking to defer rather than deal with this issue, contrary to paragraph 35c of the NPPF.

2.23 Taylor Wimpey have significant concerns regarding this approach, which is fundamentally underpinned by an unreasonable approach to the spatial strategy which seeks to not review the Green Belt but instead focuses on exporting their shortfall to neighbouring authorities, creating a significant and unprecedented challenge on the GBBCHMA authorities in terms of plan-making.

2.24 In addition, the level of housing requirement is heavily dependent on the delivery of windfall sites, identified in the DLP to compose 2576 dwellings over the plan period, equating to 25% of the overall requirement. Although Taylor Wimpey accept that the proposed supply of windfall development is based on past trends, however, given the scale of reliance on this facet of delivery, there is greater uncertainty on the authority meeting its need. Windfall allowances comprise a significant element of the housing supply in Dudley, which therefore means that a high degree of inaccuracy is associated with draft Policy DLP1.

2.25 Furthermore, the DLP's vision is to comprise a wide range of housing that will meet people's needs, however, this vision is contrary to the approach taken by the Council as they are not meeting the housing shortfall within their own authoritative boundary. The DLP's vision is not achievable based upon the policy choices embodied within the plan.

2.26 Taylor Wimpey considers instead of exporting their shortfall onto neighbouring authorities, the DLP should release green belt land to align with the DLP's vision and address the housing shortfall currently existing within the DLP.

2.27 Notwithstanding Taylor Wimpey's comments above in relation to the Council's housing requirement, as the Council will be aware, the Government has consulted on changes to the SM and the calculation of housing needs within the revised NPPF. The Council have not acknowledged this revision within the draft DLP which would see the Council's LHN increase substantially by 143% as detailed below.

Changes to the Standard Method and NPPF

2.28 The government announced a consultation on the proposed changes to the NPPF following its election in July which ran for two months. The amendments to the NPPF largely reversed the changes made in December 2023, as such, it has reversed the stance that the SM is an advisory starting-point for establishing a housing requirement, instead the LHN, conducted via the SM, is a minimum target for housing development.

2.29 As part of the revised NPPF, a new SM is proposed which adopts the following two-step approach:

1. Take 0.8% of the current housing stock of the area;
2. Apply an uplift, based on a three-year average of the median workplace-based affordability ratio, with an increase of 15% for every unit above four.

2.30 Based on the above methodology, the proposed new SM for Dudley would result in the LHN increasing to 1,594 dpa, an increase of 143% from the current LHN of 657 dpa, equating to 27,102 dwellings across the plan period, therefore, the Council would be required to identify a further 16,632 dwellings.

2.31 In addition to the update in housing supply within the NPPF, the revised version indicates Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified including where an authority cannot meet its identified need for housing, commercial or other development through other means (paragraph 142). Taylor Wimpey contends that authorities should review Green Belt boundaries and propose alterations to meet these needs in full, unless the review provides clear evidence that such

alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole.

2.32 It is appreciated that the proposed changes to the NPPF carry limited weight at present given the consultation has recently ended and has not yet been adopted, however, it is anticipated the NPPF is to be published in December 2024, likely to be prior to the DLP reaching examination. Furthermore, Angela Rayner, the Deputy Prime Minister, and Secretary of State for the Ministry of Housing, Communities & Local Government has indicated in her Written Ministerial Statement [WMS] (dated 30th July 2024) the direction of travel for addressing housing needs by stating "*local authorities will be expected to make every effort to allocate land in line with their housing need as per the standard method*". This is considered a material consideration and coupled with the transitional arrangements outlined in paragraphs 226-229 of the consultation document, it is clear that the Council will need to plan for the new SM figures in the draft DLP.

2.33 As such, should the framework reach adoption in December 2024 as anticipated, it is considerably unlikely the draft DLP will reach regulation 22 prior to the adoption of the NPPF. Therefore, it is vital the DLP identifies further land at this stage of the local plan production to meet the additional 16,628 dwellings from the new SM. When having regard to the Government's other proposed changes, particularly around the need for the release of the Green Belt, there is no justification for the Council's currently proposed approach of not reviewing and releasing land from the Green Belt to meet its needs and address the c.16,600 dwelling unmet needs arising from the new SM figure.

2.34 To this end, it is clear the DLP must comply with the draft NPPF and identify further land for housing to meet the rising LHN based on the revised NPPF. Taylor Wimpey considers the Council should seek to release land from their Green Belt to meet the substantial increase in housing needs and help support the shortfall from the GBBCHMA, as such, considers Land at Clent View Road to be appropriate as it is suitable, available and achievable.

GBBCHMA Unmet Housing Needs

2.35 As noted above, the Council's proposed spatial strategy is seeking to export its shortfall to neighbouring authorities. Taylor Wimpey strongly objects to draft Policy DLP1 on this ground as the DLP fails to acknowledge and address the unmet housing need arising from the GBBCHMA, instead the DLP looks to increase the pressure on the GBBCHMA despite the neighbouring authorities suffering from a constrained urban landscape. This approach is fundamentally contrary to NPPF paragraphs 35(b & c), as the Duty to Cooperate has not been fulfilled.

2.36 As the Council will be aware, each authority in the Black Country is suffering with land supply pressures as they progress their respective Local Plan following the cancellation of the Black Country Plan Review. Presently, the latest versions of each authority's emerging local plan is at regulation 19 stage, except for Walsall which has recently undergone a call for sites consultation, and within their plans they have identified the following shortfalls as presented in Table 2.2 below.

Table 2.2 Black Country Shortfall

Local Authority	Land Supply	Current SM	Shortfall
Dudley	10,470	11,169	699
Sandwell	10,434	29,456	19,022
Walsall	7,926	16,304	8,378
Wolverhampton	9,330	19,736	10,406
Total	**38,160**	**76,658**	**38,498**

2.37 The above table demonstrates a shortfall of 38,498 dwellings which is also going to be exported to neighbouring authorities, highlighting the level of pressure the BCA's are already under.

2.38 In addition, Birmingham Local Plan has recently undergone a consultation on regulation 18 preferred options in which the plan demonstrated a significant shortfall as highlighted in Table 2.3 below.

Table 2.3 Birmingham Shortfall

Local Authority	Land Supply	Current SM	Shortfall
Birmingham	103,027	157,828	54,801

2.39 Based upon the demands for housing in both the BCA's and Birmingham, there is a significant shortfall of 93,299 dwellings caused by the urban context of all the authorities, therefore, highlighting the importance of each authority effectively delivering on their Duty to Cooperate.

2.40 Notwithstanding the existing shortfall identified within the GBBCHMA, following the revised SM from the draft NPPF, there is to be significant amendment to the LHN for each authority as outlined in Table 2.4 below.

Table 2.4 GBBCHMA Shortfall Based on the New SM

Local Authority	Land Supply	Proposed SM	Shortfall
Birmingham	103,027	109,384	6,357
Dudley	10,470	27,102	16,632
Sandwell	10,434	28,665	18,231
Walsall	7,926	23,283	15,357
Wolverhampton	9,330	22,092	12,762
Total	**141,187**	**210,526**	**69,339**

2.41 It is noted that the revised SM significantly reduces the unmet need for Birmingham, therefore, reducing the overall shortfall of the GBBCHMA to 69,339 dwellings compared to 93,299 dwellings, however, a shortfall still exists for each local authority which are all proposing to be export onto neighbouring authorities within their draft local plans. As currently proposed, neighbouring authorities to the Black Country which are contributing to the GBBCHMA Unmet Housing Needs comprise the authorities listed in Table 2.5.

Table 2.5 Direct Contributions to the GBBCHMA's Housing Shortfall

Local Authority	Current Stage of Plan-making	Proposed Contribution
Cannock Chase	Regulation 19	500
Shropshire	Examination	1,500
South Staffordshire	Regulation 19	640
Stafford	Regulation 18	2,000
Telford & Wrekin	Regulation 18	1,680
Total		**6,320**

2.42 Although Taylor Wimpey maintains its stance on the likelihood of Shropshire's housing contribution coming forward in the short term and the current status of Stafford's Local Plan following the pause in 2020, the current level of contributions equating to 6,320 dwellings is clearly insufficient to meet the existing and upcoming shortfall within the GBBCHMA. As a result a significant proportion of the unmet need would be deferred rather than dealt with, contrary to paragraph 35c of the NPPF.

2.43 In addition, Paragraph 11b of the NPPF is clear that "*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.*" In this context, the spatial strategy proposed by Draft Policy DLP1 is therefore considered to be unsound as it does not assess the implications of exporting its own unmet need but instead amplifies the significant, and persistent level of unmet housing need arising across the GBBCHMA, of which many of the neighbouring authorities are unable to deal with. Therefore, Taylor Wimpey considers it entirely plausible for Dudley to explore alternative strategies to meet the unmet need within their administrative boundary, such as releasing land from the Green Belt rather than adopting a high-risk strategy associated with exporting the significant shortfall.

2.44 Additionally, there is no formal agreement between the authorities making up the GBBCHMA regarding the apportionment of this unmet need, and importantly, these 'commitments' do not form part of any adopted Local Plan that has been tested and approved through the examination process. There is no clear indication in regard to where the contributions will be allocated and so uncertainty remains.

2.45 As such, the Council would be placing significant and additional pressures on the GBBCHMA to meet further unmet housing needs, when its perceivable to review and release land from its Green Belt to reduce its own unmet housing needs accordingly. This is particularly pertinent given the revision of paragraph 142 in the draft NPPF which enables Green Belt boundaries to be amended to meet its own housing needs in its entirety.

2.46 Taylor Wimpey strongly contends that that areas like Dudley, with a large quantum of suitable land within the Green Belt, have a duty to support housing growth and not only address its own housing need but also the shortfall of housing provision within the HMA, particularly given the constrained urban nature of other authorities in the GBBCHMA.

2.47 To this end, Taylor Wimpey considers it to be critical that the DLP meets its own housing unmet need within the confines of Dudley and additionally makes a proportionate contribution to addressing the unmet housing needs of the GBBCHMA. Failure to deliver

the housing needs of Dudley it administrative boundary and to reach agreement with the GBBCHMA constituent authorities with regard to the spatial distribution of the housing shortfall will result in the DLP being unsound and out of alignment with national planning policy.

Duty to Cooperate

2.48 Given the unmet housing need within the GBBCHMA, it is critical that cooperation and suitable planning is taken via an effective Duty to Cooperate Statement. Although a revised Duty to Co-operate Statement has been published as part of the regulation 19 consultation, it does not effectively address how the housing shortfall will be mitigated nor how it will support the neighbouring authorities help address the wider shortfall within the GBBCHMA.

Paragraph 4.11 of the revised Duty to Co-operate Statement states that an "*apportion the contributions between the four authorities based upon the use of migration data and the functional relationship between the exporting area and the individual BCA where the shortfall arises.*"

2.49 However, paragraph 4.4 of the revised Duty to Co-operate Statement states:

"*Given that the BCAs are now pursuing their own individual plans, the existing 'offers' from neighbouring areas will need to be clarified and apportioned between the BCLAs as part of a formal agreement. This formal agreement will be via Statements of Common Ground (SoCG) which at the time of updating this DtC statement are currently being drafted and being agreed between the relevant local authorities*."

2.50 This confirms that Dudley is yet to agree to a Statement of Common Ground with the neighbouring HMA authorities in regard to how the contributions will be distributed within the Black Country, causing a degree of uncertainty in regard to how Dudley's housing shortfall will be met. Without any signed SoCG, there is no commitment to how the wider housing contributions will be distributed given that there is significant shortfall within the GBBCHMA.

2.51 NPPF paragraph 35(c) confirms that plans are sound if they are "*based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground*". However, it is clear from the approach taken in the DLP that Dudley is simply passing the issue of meeting the GBBCHMA shortfall onto neighbouring authorities rather than cooperating and providing a proportionate contribution considering there is suitable land available within the Green Belt.

2.52 As previously highlighted, as part of the production for the DLP, the Council has identified potential contributions for housing from neighbouring authorities as follows:

Table 2.6 Summary of Direct Contributions to the GBBCHMA's Housing Shortfall

Local Authority	Contribution	Status of Plan	Statement of Common Ground (SoCG)	Potential contribution towards Dudley's shortfall
Shropshire	1,500 to BCA	Examination in Public	SoCG signed in July 2021 and addendum	Potential appointment of 431 homes to Dudley. Subject to

			signed in September 2024	formal agreement/SoCG between BCAs.
South Staffordshire	640 to GBBCHMA	Regulation 19	Updated bilateral SoCG agreed and subject to formal sign off via Dudley MBC's Cabinet 23rd October 2024.	Potential appointment of 153 homes to Dudley. Subject to formal agreement/SoCG between BCAs and Birmingham City Council.
Telford & Wrekin	1,640 to BCA	Regulation 18	SoCG to be progressed as part of the GBBC HMA	Potential appointment of 242 homes to Dudley. Subject to formal agreement/SoCG between BCAs and Telford & Wrekin.
Cannock Chase	500 to BCA	Regulation 19	SoCG to be progressed as part of the GBBC HMA	Potential apportionment of 16 homes to Dudley. Subject to formal agreement/SoCG between BCAs and Birmingham City Council.

Source: Dudley's Spatial Strategy Development Table 1

2.53 Noting that an SoCG has yet to be signed and completed, the figures illustrated in Table 2.6 are wholly flawed and misleading.

2.54 As previously highlighted the status of the Shropshire Local Plan is unclear given its pause in examination, therefore, the contribution of 1,500 dwellings to the BCA's is also unclear. Taylor Wimpey currently considers the level of contribution to the GBBCHMA from neighbouring authorities is 6,320 dwellings meaning only 6.8% of the required contributions are being met.

2.55 The PPG[2] confirms that the preparation of SoCGs with neighbouring authorities will contribute to demonstrating whether the duty has been met:

"*The local plan examination will first assess whether a local planning authority has complied with the duty to cooperate and other legal requirements. The Inspector will use all available evidence including statements of common ground, Authority Monitoring Reports, and other submitted evidence (such as the statement of compliance prescribed by Planning Inspectorate's examination procedure guidance) to determine whether the duty has been satisfied.*" [Emphasis added]

2.56 As currently presented, Taylor Wimpey regard the duty to cooperate to be unfulfilled given that no SoCGs nor additional evidence detailing the discussions that have taken place has been published. In the absence of any SoCG, it reinforces the apparent issues between the Black Country Authorities ("BCA") as it is clear there remains a number of areas of disagreement regarding the distribution of the contributions.

2.57 The DLP has clearly not sought to maximise housing land supply in its own authority to deal with the GBBCHMA unmet need as well as Dudley's own housing shortfall of 16,632 dwellings, an issue that Dudley is required to fulfil following the revised NPPF requiring local planning authorities to meet their housing need in full within their administrative

[2] PPG: 61-031-20190315

boundaries. The need for a contribution towards the GBBCHMA is also considered appropriate to fulfil its duty to cooperate as the neighbouring authorities can only contribute 6,320 dwellings at present, a figure considerable shorter than the shortfall of 93,299 dwelling (69,339 dwelling shortfall based on the new SM).

2.58 Dudley's shortfall will remain unaddressed given the BCA's unmet need, and the lack of a signed SoCG. Indeed, this is particularly pertinent, given an Inspector's recent letter on the Oxford Local Plan 2040[3]. The Inspector concluded in September 2024 that there is no mechanism to rectify a failure to comply with the duty to co-operate and recommended the Council to withdraw the Local Plan.

2.59 At present, the Council have not satisfied the duty to cooperate as required by NPPF paragraph 24. The Council is demonstrably seeking to defer, rather than deal with the issue of unmet housing need through the DLP. Instead the Council should seek to maximise the LHN within its own authority before seeking to delegate its shortfall onto the neighbouring authorities through a SoCG.

Draft Sustainability Appraisal

2.60 An updated Sustainability Appraisal (SA) has been undertaken as part of the regulation 19 consultation which presents the assessment of updated DLP policies and new/amended reasonable alternative sites that have come forward since the Regulation 18 stage. However, no further assessments have taken place on reasonable alternatives to the housing spatial growth options, maintaining the three previously identified growth options as identified in Table 2.7 below.

Table 2.7 Dudley Housing Spatial Growth Options Identified by DMBC

Housing Option	Description of Housing Spatial Growth Option
Option 1	Meeting the majority of our needs in the urban area alone and maintaining the existing 'brownfield first' strategy.
Option 2	Meeting the majority of our housing need through urban uplift in regeneration corridors and centres plus some development proposed on smaller areas of low-quality open space.
Option 3	Meeting all or the majority of our housing need through urban uplift in regeneration corridors and centres, some development proposed on smaller areas of low quality open space, plus DtC contributions. To be formulated for Regulation 19 stage of the DLP.

Source: Table 5.1 of the Draft Sustainability Appraisal of the Draft Dudley Local Plan (September 2024)

2.61 Taylor Wimpey maintains its stance from the regulation 18 representations that the SA does not explore all the reasonable alternatives to meet its LHN as it solely explores a brownfield led strategy which does not meet its LHN nor help meet the shortfall from the GBBCHMA, as such, Draft Policy DLP1 is unjustified and contrary to paragraph 35(b) of the NPPF.

2.62 Paragraph 5.3.6 concedes that "*all three housing spatial growth options are likely to deliver a similar level of growth within Dudley itself*", a statement which undermines the

[3] exam-20---inspectors-post-hearings-letter-to-council-september-2024
https://www.oxford.gov.uk/downloads/file/3600/exam-20---inspectors-post-hearings-letter-to-council-september-2024

plan making process as an option for delivering a higher level of growth has not been explored, such as by releasing suitable sites within the Green Belt.

2.63 The Council are continuing to progress the development strategy through option 3 despite paragraph 5.3.10 stating "*there is also some uncertainty in the impacts of this option given the unknown location of the exported proportion of growth*". This statement concedes the robustness of the development strategy is weak and that there is no guarantee Dudley will meet its LHN. Taylor Wimpey believes sufficient justification is warranted for Dudley to undertake further assessment on the alternative options for housing growth, particularly noting the severe unmet housing need within the GBBCHMA, indicating the current development strategy is unsound.

2.64 In this respect, the PPG[4] confirms that reasonable alternatives are to be identified "*taking into account the objectives and the geographical scope of the plan or programme*". Consequently, it is not within the remit or scope of the SA to appraise the sustainability credentials of exporting housing growth outside of the administrative area of Dudley.

2.65 At present, the SA does not provide any justification for why the three options for growth are all predominantly brownfield-led, following a very similar strategy, of which, none of them meet the authorities LHN as required by revised NPPF, instead they put reliance on the neighbouring authorities to meet their shortfalls in addition to the wider GBBCHMA. The PPG advises that,

"*Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.*"

2.66 As such, Traylor Wimpey consider the SA does not satisfy best practice, instead it should seek to explore a strategy involving the release of green belt to enable the authority to meet its LHN in its entirety as well as help contribute to meeting the GBBCHMA shortfall.

The Deliverability of Brownfield Land

2.67 DLP indicates that 97% of the housing requirement will be delivered on brownfield land with the remaining 3% to be delivered on greenfield land. Whilst Taylor Wimpey considers that it is appropriate to seek to redevelop brownfield land first in accordance with the NPPF (i.e., Footnote 27 and paragraphs 123, 128 and 146), Taylor Wimpey has legitimate concerns regarding the actual deliverability of predominantly brownfield land and consider the overreliance on the source of delivery as unjustified.

2.68 The challenges associated with the development of brownfield land have been acknowledged by paragraph 6.6 of the DLP which states:

"*The DLP adopts a brownfield-first approach to maximise delivery of development within the urban area; however, poor ground conditions that are a legacy of the Dudley's mining and industrial past are a significant constraint, in both physical and financial terms. Therefore, tackling significant and structural delivery constraints are a priority for interventions, as they affect much of the development land supply in the urban area.*"

[4] PPG ID: 11-019-20140306

2.69 Given this position conceded by the Council, Taylor Wimpey considers that the level of delivery anticipated by the DLP is unlikely to be delivered given the constraint from poor ground conditions which will limit certainty and investment from developers as brownfield redevelopment has its disadvantages as outlined below.

- Brownfield sites are often constrained by soil and groundwater contamination from previous industrial or commercial activities, which requires costly remediation, adding significant monetary and time costs to the overall development. Moreover, securing financing for brownfield redevelopment can be challenging due to the perceived risks associated with contamination cleanup, longer construction timelines and uncertainties about the final development costs.
- They may lack the necessary infrastructure to support housing development such as utilities and roads. Given the potential existing constraints that the urban landscape can possess, upgrading or installing infrastructure can be costly, cause inconvenience to local residents and may require collaboration with local authorities, which is a time-consuming process.
- Due to the complexity of brownfield redevelopment, obtaining planning permissions and approvals from regulatory authorities may take longer compared to greenfield sites, leading to delays in project timelines.
- The physical constraints working on brownfield sites within the urban landscape means there is less available space for future expansion for future plan period.
- The location and history of brownfield sites may deter future residents from moving there, impacting their market appeal, potentially deterring developers from investing in the redevelopment of specific areas.

2.70 Despite the likelihood that the identified brownfield land supply will not deliver 97% of the housing requirement, the strategy is still insufficient to identify all of Dudley's LHN, demonstrating draft Policy DLP1 is unsound and is not capable of meeting its own needs.

2.71 Furthermore, there are viability concerns on a brownfield led approach which will impact the delivery of affordable housing and family housing. The delivery of urban brownfield land tends to lend itself to the delivery of high-density flatted developments rather than housing, impacting on the range of housing mix and tenure available to the authority, contrary to paragraph 60 and 64 of the NPPF as well as the DLP's own vision and Strategic Priority 6.

2.72 Taylor Wimpey consider no one spatial strategy approach should be taken in isolation, and it is considered that a mix of brownfield and greenfield/Green Belt land is necessary to meet the Council's housing needs and make provision for a mix of types and tenures of dwellings to meet specific needs in line with the requirements of paragraphs 60,63 and 64 of the NPPF.

Transitional Arrangements of the Draft NPPF

2.73 As identified throughout the representations, Taylor Wimpey has significant concerns on the soundness of the DLP, as such, consider the likelihood of the plan proceeding through an examination in public (EIP) as highly unlikely. This viewpoint is taken based on the hard

stance taken by PINS as illustrated by the emerging Solihull Local Plan, North Lincolnshire Local Plan being withdrawn.

2.74 These actions follows Matthew Pennycook's letter to the chief executive of PINS on the 30th July 2024 in which he wants to empower Inspectors to take the tough decisions they need to at examination and focus their time on plans capable of being found sound. As such, Pennycook believes "*pragmatism should not be used to address fundamental issues with the soundness of a plan*" and "*an authority should not be submitting ·tor examination a deficient plan believing the Inspector will use significant time and resource during the examination to 'fix' it.*"

2.75 As such, based upon the tough actions taken so far on local plans at examination and Pennycook's letter encouraging PINS to take a rigorous approach, it is considered the DLP will not proceed through examination noting they have failed to meet their LHN, have not taken account of the draft NPPF and the revised policies, as well as failing to meet its duty to cooperate to contribute towards meeting the shortfall in the GBBCHMA.

2.76 However, should the local plan comply with the requirements of NPPF paragraphs 226-229 and reach examination on or before the publication date + one month of the NPPF and then be found sound by an inspector, the local authority will be required to carry out a local plan review straight after adoption. This is required to comply with paragraph 227 which requires an authority with an increase of over 200 dwellings to its LHN to commence plan-making in the new plan-making system. The current approach appears to be rushing the DLP through to examination prior to the draft NPPF being adopted, however, Taylor Wimpey consider this strategy will result in sufficient delays to the delivery of much needed homes and believe the Council are not taking responsibility in meeting the rising issue in the short term but are avoiding dealing with the problem, causing considerable public cost. Instead the Council should look to address the housing shortfall at this stage of local plan production.

2.77 As a result of the amendment to the standard method, the Council are encouraged to pause the progress of the local plan and identify suitable and sustainable land to help meet the future housing needs of the authority at the earliest stage of plan production. Given the significant scale of LHN, the Council should seek to release land from the Green Belt to assist in meeting the growing LHN in addition to helping contribute to the shortfall within the GBBCHMA.

Exceptional Circumstances and Green Belt Release

2.78 Taylor Wimpey acknowledges the changes made in the December 2023 NPPF towards reviewing the Green Belt, however, these changes do not in and of themselves preclude a local planning authority from releasing Green Belt land, so long as a local planning authority has satisfied the sequential approach in utilising its supply of brownfield land, optimising densities and engaging with neighbouring authorities to assist in meeting needs and demonstrating that 'exceptional circumstances' exist (Para 146, NPPF). To this end, it is entirely reasonable and consistent with the NPPF for the Council to release Green Belt land to assist in addressing their own housing needs.

2.79 Therefore, when considering the sequential approach required to demonstrate whether 'exceptional circumstances' exist, Taylor Wimpey consider that it is clear that:

a There is insufficient brownfield land to meet the city's development needs;

b By reason of this, the optimisation of densities on brownfield land is also unlikely to meet the city's development needs; and

c Given the emerging c.93,000 dwelling scale of the unmet needs across the GBBCHMA, it is unlikely that other authorities within the GBBCHMA could meet these cumulative needs in full.

2.80 When having regard to the above, these housing needs might reasonably be considered an 'exceptional circumstance'.

2.81 Given that the local authority has adopted a strategy which is considered neither positively prepared nor aspirational, Green Belt release is considered vital in supporting the Council meet its unmet need in entirety whilst also supporting the GBBCHMA meet its shortfall. Taylor Wimpey considers that despite changes to the NPPF in relation to the need for Green Belt release, it does not preclude an LPA from releasing Green Belt land. Taylor Wimpey considers the most suitable strategy for achieving the required housing growth would be through the release of Green Belt land rather than depend on a brownfield led strategy, particular given the constrained urban nature of the borough.

2.82 Notwithstanding the adopted NPPF, as previously highlighted, Taylor Wimpey consider the draft NPPF is the appropriate framework to comply with given the estimated timescales for adoption, therefore, the Council must acknowledge the forthcoming unmet need from the new SM. There is a clear requirement for the Council to identify further land to meet the increased LHN of 16,632 dwellings which can only be met by adopting an alternative approach than a brownfield led strategy. Taylor Wimpey believe releasing land from the Green Belt is appropriate to meet the increased need rather than relying on the GBBCHMA authorities to contribute to meeting the substantial needs which is strongly unlikely given the protracted nature to meeting the shortfall to date.

2.83 As part of the revised NPPF, paragraph 142 (formerly paragraph 145) has been updated to reverse the change made in the December 2023 NPPF to now include the following text;

"*Exceptional circumstances include, but are not limited to, instances where an <u>authority cannot meet its identified need for housing</u>, commercial or other development through other means. In these circumstances authorities should review Green Belt boundaries and propose alterations to meet these needs in full, unless the review provides clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole*"

2.84 As the Council have confirmed they are unable to meet their LHN and a review of the Green Belt has not taken place within the SA to demonstrate it will be adversely impacted by an amendment to the boundary, Taylor Wimpey considers exceptional circumstances exist noting the significant shortfall as part of the revised SM. The Council has even accepted that the housing need cannot be accommodated in full on the available brownfield land within the administrative area. The extent of the Green Belt is such that, unless it is amended, it will significantly restrict the amount of residential development that could be accommodated in Dudley. Taylor Wimpey considers there to be a legitimate and cogent need to consider the release of Green Belt land within Dudley to meet the significant shortfall and reduce the level of unmet housing needs arising from the GBBCHMA.

2.85 Notwithstanding Taylor Wimpey's position that the DLP should be complying with the draft NPPF, should the plan proceed through examination in its current format, it is clear that the Council cannot meet its considerable shortfall of 16,632 dwellings based on the revised SM. In accordance with the transitional arrangements of the NPPF in paragraphs 226-229 referred to above, a local plan review will need to be immediately undertaken to identify a housing supply to meet the revised LHN. As such, Taylor Wimpey considers the minimum requirements at this stage of local plan production is for the Council to identify safeguard land in order to quicken the process as part of the next LP review and save considerable public cost.

2.86 Given the considerable shortfall, there is clear justification for the allocation of safeguarded land to support meeting the future needs of the authority arising from the revised SM. Taylor Wimpey believes there is sufficient land supply in the Green Belt to sustainably contribute towards meeting the unmet needs for the authority, one site being Land at Clent View Road which is considered appropriate given its immediately adjacent to the urban area and is not restricted by any designations or technical constraints. This approach will accord with paragraph 148c of the NPPF which states "*where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period*".

2.87 Considering the LHN is to substantially increase to 27,102 dwellings creating a shortfall of 16,632 dwellings, this matter is considered a fundamental issue of the DLP which, unless resolved at the Regulation 19 stage, will most likely lead to it being found unsound at examination, particularly noting the rising unmet need within the GBBCHMA, of which the DLP is not anticipating to contribute to contrary to the Duty to Cooperate outlined in paragraph 24 of the NPPF.

2.88 In summary, Taylor Wimpey believe exceptional circumstances can be demonstrated for the release of Green Belt in order to meet the unmet needs arising from the amendment to the SM within the draft NPPF as well as contribute towards the unmet needs within the GBBCHMA. As such, land at Clent View Road should be released from the Green Belt and allocated for housing development as it is considered suitable and deliverable within the plan period as set out in section 3 of the representations.

Non-Strategic Policies

Draft Policy DLP12 (Delivering Affordable, Wheelchair Accessible and Self-Build / Custom-Build Housing)

2.89 Policy DLP12 has been amended as part of the regulation 19 document to reflect the updated Housing Market Assessment in which the Council are requiring an increased proportions of affordable housing delivery in medium value zones of the Borough from 10% to 20% on brownfield land and from 20% to 25% on greenfield sites. However, this change does not address the concerns raised by Taylor Wimpey in the regulation 18 consultation that the approach on a site-by-site basis. St Philips therefore objects to draft Policy DLP12 on the grounds of soundness as the policy should be implemented via plan-led viability testing.

2.90 It is noted that within draft policy DLP12 (Delivering Affordable, Wheelchair Accessible and Self-Build/Custom-Build Housing), paragraphs 8 and 9 of the Financial Viability Assessments section state that;

"*On sites where applying the affordable housing or wheelchair accessibility requirements can be demonstrated to make the development unviable, the maximum proportion of such housing will be sought that will not undermine the viability of the development, subject to achieving optimum tenure mix and securing other planning obligations necessary for the development to gain planning permission.*

Financial viability assessments conforming to national guidance will be required to be submitted and, where necessary, independently appraised by an appropriate professional appointed by the local planning authority at the cost of the applicant. Flexible arrangements will be sought through planning agreements, wherever possible, to allow for changing market conditions in future years. Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances, and in such circumstances an executive summary will be made publicly available." (Emphasis added)

2.91 This indicates that an application-led viability assessment will be required on a site-by-site basis. However, the NPPF clearly indicates in paragraph 58 that;

"*Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available."* (Emphasis added)

2.92 As such, the draft Local Plan proposing for a viability assessment to be undertaken for all applications demonstrates a clear conflict with national policy which indicates it's at the applicant's discretion to produce a viability assessment under particular circumstances, and not on a site-by-site basis. This point is reinforced by paragraph 15 of the NPPF which states that "*the planning system should be genuinely plan-led*" and not led on a site-by-site basis.

2.93 Taylor Wimpey therefore objects to draft Policy DLP12 (Delivering Affordable, Wheelchair Accessible and Self-Build/Custom-Build Housing) and finds the Draft Policy to be unsound as the reliance on application-led viability testing within the draft Dudley Local Plan would appear contrary to paragraph 58 of the NPPF.

2.94 The deliverability of Affordable, Wheelchair Accessible and Self-Build/Custom-Build Housing is critical to deliver as part of the plan strategy to meet identified needs and should be able to be achieved on sites identified for delivery through the draft Local Plan.

3.0 Land at Clent View Road, Stourbridge

3.1 As set out in Section 1.0 of these representations, Taylor Wimpey is promoting land at Clent View Road, Stourbridge for residential development. Taylor Wimpey UK Limited is a dedicated homebuilding company with over 126 years' experience; Taylor Wimpey has an unparalleled record in the housebuilding industry. Taylor Wimpey draws on experience as a provider of the best quality homes to meet the expectations of today's residents. Taylor Wimpey strives to locate development within sustainable locations and carefully considers both the present and future benefits of development, therefore, creating positive impacts on the surrounding environments and communities.

3.2 The Vision Document attached to appendix 2 of these representations demonstrates Taylor Wimpey's commitment to helping Dudley to achieve its aspirations and vision over the next Plan Period, by creating an attractive and healthy environment for future residents which focuses on sustainability, green infrastructure and biodiversity, community needs, accessibility and active travel.

3.3 The site, encompassing an area of 3.8ha, is currently comprised of greenfield land used as equestrian paddocks (Appendix 1 for a Site Location Plan). The site is located within the Green Belt and adjoins the built-up area. It is bounded to the north by a public bridleway beyond which is dense woodland and agricultural land. To the east there is a permissive footpath named 'Roman Road', Clent View Road and the urban area of Stourbridge. This footpath is separated from the Site and Clent View Road by hedgerows. To the south there is a side road and a collection of mature trees along with some dense shrubbery, beyond which lies High Lodge house and agricultural land. To the west, additional agricultural land borders the site; further afield, there is a patch of dense woodland extending from High Lodge Care Services northwards.

3.4 Taylor Wimpey considers that Land at Clent View Road forms a logical and sustainable location for an urban extension, and its release from the Green Belt would make a significant contribution to the housing needs of Dudley and the GBBCHMA. There are no physical or technical constraints upon the development of the Site, and currently, no viability issues affecting the deliverability of the Site. As such, if the Site is released from the Green Belt, it is considered to be suitable, available and deliverable within the first 5 years of the Plan Period.

3.5 Dudley is ambitious with its pro-growth agenda and aims to expand in order to meet the needs of the community. This is demonstrated within the vision for the new Local Plan emphasising growth in homes and jobs and building a strong and resilient local economy. However, as discussed above, future growth of the existing urban area and the deliverability of brownfield land is restricted by a number of physical and economic constraints. The actual supply of housing within the Local Plan period is likely to be lower than what has been stated within the DLP. It is therefore a suitable and justified strategy for the Council to consider the release of Green Belt land in order to meet the development needs of Dudley.

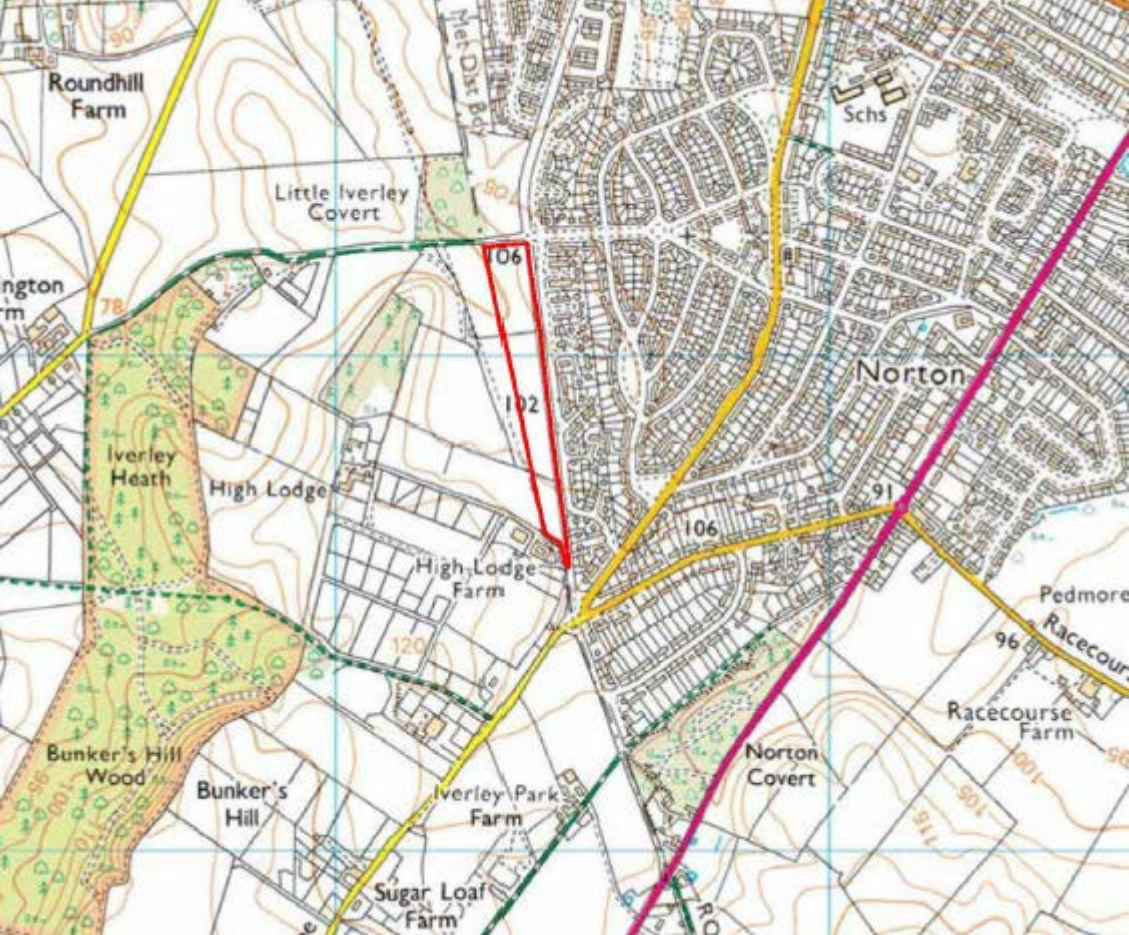
3.6 Taylor Wimpey considers that the land at Clent View Road offers an ideal opportunity to deliver a high quality, attractive and well-integrated new neighbourhood, which forms a natural and logical extension to Stourbridge with suitable connections to existing facilities and community services.

3.7 The overall site area is 3.8ha, equating to approximately 80 new homes. The site provides the opportunity to provide a development which is specific to its context and responding to the needs of the local community. The proposals will retain and enhance the existing tree belts and hedgerows which run along the boundaries of the Site to improve levels of Site containment and mitigate visual impact. The Site is located to the west of the residential area of Stourbridge in close proximity to a number of services and facilities in Stourbridge. Schools, shops, residential communities, and leisure facilities are all accessible by a choice of means of transport, including walking and cycling. The site is situated is situated 0.4km from Shenstone Avenue bus stop, which provides regular services to the centre of Stourbridge and Dudley.

3.8 The proposed development at Clent View Road aims to create a welcoming environment that caters to the diverse requirements of prospective residents, addressing Dudley's housing needs in the upcoming Local Plan period. These plans adhere to the '20-minute neighbourhood concept, fostering improved access to sustainable transportation methods, bolstering pedestrian and cycling links, and promoting active travel. The location offers prospects for integration with current infrastructure, facilitating connections to nearby primary and secondary schools, healthcare facilities, and other essential amenities crucial for a high standard of living.

3.9 In summary, the site is ‘suitable, available and achievable’ and the Vision Document (Appendix 2), submitted in support of these representations, demonstrates that the site is capable of delivering an urban extension to the south-west of Stourbridge, on an unconstrained site, which aligns with the Vision and objectives of the new Local Plan.

Appendix 1 Site Location Plan


Roundhill Farm
Little Iverley Covert
106
102
Norton
Schs
Iverley Heath
High Lodge
High Lodge Farm
91
106
Pedmore
96
Racecourse Farm
Bunker's Hill Wood
Bunker's Hill
Iverley Park Farm
Norton Covert
Sugar Loaf Farm

Appendix 2 Vision Document

Taylor Wimpey

Land at Clent View Road, Stourbridge

Vision Statement

March 2023

Taylor Wimpey

For more information contact:

Taylor Wimpey
Second Floor, Fore 2,
Fore Business Park,
Huskisson Way,
Shirley, Solihull, B90 4SS

www.taylorwimpey.co.uk

LICHFIELDS

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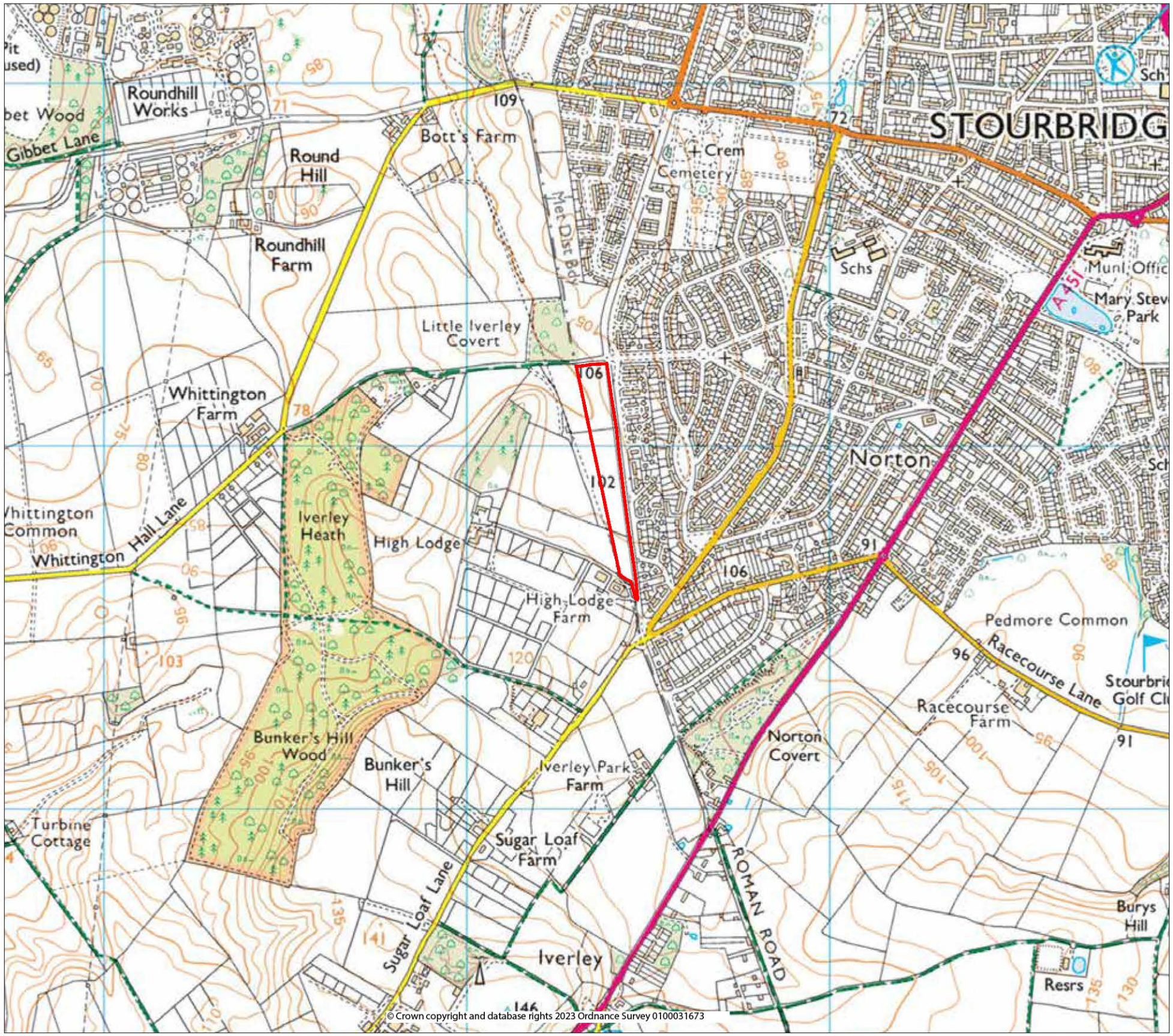
1.0 Introduction

Figure 1: Location Plan



1.0 Introduction

This Vision Statement has been prepared to demonstrate that the land at Clent View Road, Stourbridge [the Site] is suitable, available and deliverable. The Site is in the control of Taylor Wimpey UK Limited [Taylor Wimpey] who are capable of delivering a high quality and sustainable development of up to 80 dwellings.

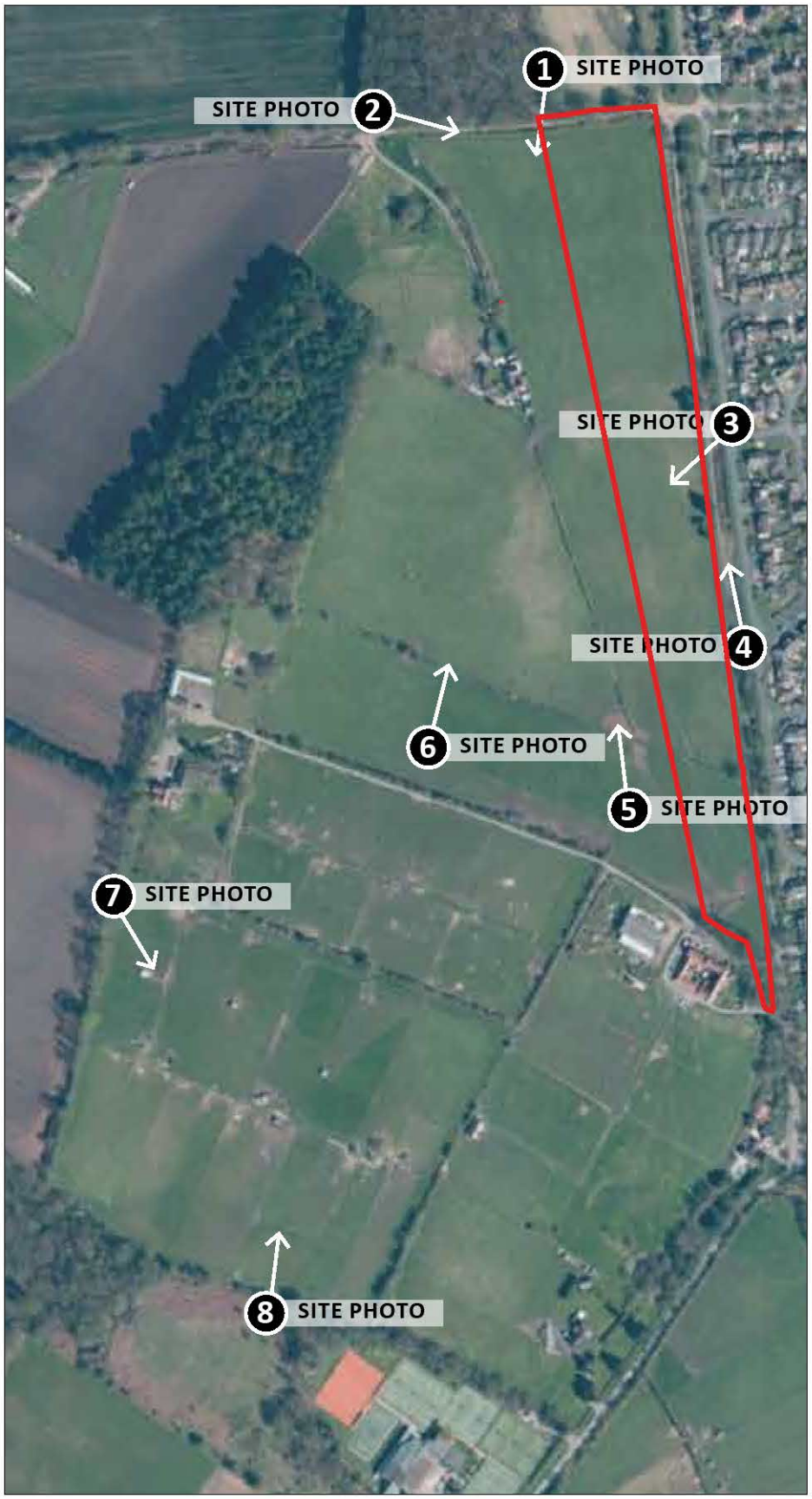
This document supports the allocation of Clent View Road, Stourbridge in the emerging Dudley Local Plan review [DLP] to assist in meeting the local housing needs for Dudley Metropolitan Borough as well as the acute unmet housing needs within the neighboring authorities.

The Vision Statement will:

- Outline the opportunity presented by the allocation and future development of the Site and its potential to deliver up to 80 dwellings;
- Set out the vision for the Site and summarises the design process that has led to the preparation of the Masterplan;
- Demonstrate that the vision for Clent View Road, Stourbridge can be delivered; and,
- Show that the proposed allocation and future development will deliver the Councils' objectives for the area.

2.0
Site Context

Figure 2: Site Location and Photographs



SITE PHOTO 1: Taken from Bridleway to the north of Parcel A, overlooking the north and western edges of the site. Froghall Cottages seen within view, to centre of photograph and farm building within site to left of photo.

SITE PHOTO 2: Taken from track leading to Froghall Cottages, located to the north west of Parcel A. View looks across the north of the site towards Westwood Avenue. Little Iverley Covert is seen to left of photograph.

SITE PHOTO 3: Taken from Chestnut Close, on the edge of Stourbridge, overlooking the site. Desire lines to Roman Road footpath can be seen to the centre of photo, as well as the land rising to the rear of the site.

SITE PHOTO 4: Taken from Roman Road footpath, looking northwards along the route. Properties to the west of Stourbridge are seen within photo to the right-hand side. Large veteran Pine trees are located on the site's edge to the west of the footpath.

2.0 Site Context

The Site

The site is located on the western edge of Stourbridge and is bordered by Clent View Road to the east. The site is located within the local authority boundary of Dudley Metropolitan Borough Council [DMBC].

The Site comprises 3.8ha of improved grassland currently used as equestrian paddocks.

The site is situated approximately 2.5km south-west of the centre of Stourbridge and immediately abuts the established residential suburb of Stourbridge to the east, which is located within DMBC.

Surroundings and Context

The Site is contained within well defined existing boundaries. It is bounded to the north by a public bridleway beyond which is dense woodland and agricultural land. To the east there is a permissive footpath named 'Roman Road', Clent View Road and the urban area of Stourbridge. This footpath is separated from the Site and Clent View Road by hedgerows. To the south there is a side road and a collection of mature trees along with some dense shrubbery, beyond which lies High Lodge house and agricultural land. To the west, additional agricultural land borders the site; further afield, there is a patch of dense woodland extending from High Lodge Care Services northwards.

SITE PHOTO 5: Taken from south east of Parcel A, looking towards to the north of the site. Froghall Cottages can be seen to the left of photo. The rise in the landform seen in Site Photo 2 can be seen to the centre, with Little Iverley Copse to the rear.

SITE PHOTO 6: Taken from south of Parcel A, looking over the site. Froghall Cottages are within view, as is the edge of Iverley Heath (to the left) and Stourbridge (to the right).

SITE PHOTO 7: Taken from north west of Parcel B, looking over the site. The photo shows the equestrian paddocks across the site, as well as the footpath along the southern edge of the site, overlooking Stourbridge Lawn & Squash Club.

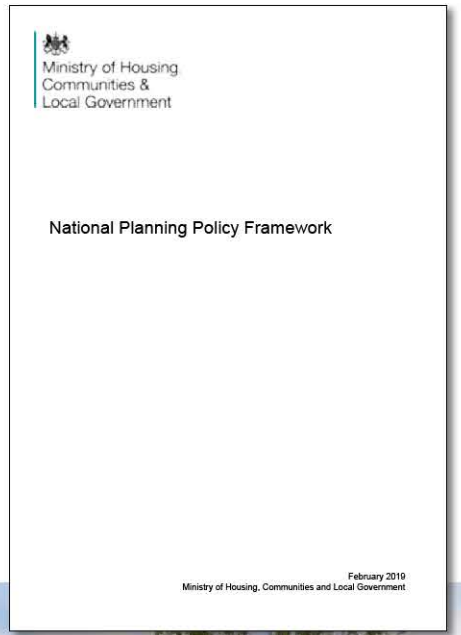
SITE PHOTO 8: Taken from south east of Parcel B, looking north over the site. The photo is taken from a gap in the hedgerow along the footpath, to the south of the site, and leading to Bunker's Hill Wood.

3

3.0
Meeting the Need for Development

3.0 Meeting the Need for Development

The Government is committed to boosting the supply of new homes to deliver 300,000 per year by the middle of the decade. The 2019 update of the National Planning Policy Framework [the Framework] introduced a standard methodology for the assessment of Local Housing Need [LHN] which is to be used to "identify the minimum number of homes expected to be planned for"[1]. There have been several versions of the standard methodology, with the current iteration (16th December 2020 ['the Standard Method 2']) introducing a 35% uplift, which is applied for the top 20 largest cities and urban centres in England (including Wolverhampton and Birmingham that are within Dudley's Housing Market Area (HMA)).


Ministry of Housing
Communities &
Local Government

National Planning Policy Framework

February 2019
Ministry of Housing, Communities and Local Government

Dudley Local Plan

Dudley Metropolitan Borough Council (DMBC) is in the early stages of preparing a New Local Plan with a Regulation 18 consultation planned to take place during summer 2023.

The decision to prepare a new Local Plan follows the decision by DMBC to withdraw from the preparation of a joint plan with the Black Country Authorities (BCAs). The evidence base that was prepared to support the earlier joint plan remains relevant however in terms of understanding the overall scale of growth that will be needed to meet employment and housing needs in the Black Country.

In terms of meeting the housing need, the Black Country Housing Market Assessment dated March 2021 utilises the Standard Method to generate a Local Housing Need (LHN) for the BCAs. For Dudley, applying the standard method approach results in a LHN figure of 636 dpa although, as it is one of the four BCAs, there are significant issues to be addressed regarding the extent to which the housing need can be delivered. In total, it was established that over the plan period (2020-39), the BCAs would have an overall annual need for 4,019 dpa (including 1,488 dpa in Sandwell, 882 dpa in Walsall and 1,013 dpa in Wolverhampton). This would establish an overall housing need for the BCAs of 76,361 dwellings and a need for 12,084 dwellings to be provided to meet the needs of DMBC.

1. Planning Practice Guidance Ref ID: 2a-002-2019022

2. Planning Practice Guidance Ref ID: 2a-010-20201216

The Black Country Urban Capacity Review Update dated May 2021 assessed the available capacity within the BCAs that would be available up to 2039 to meet housing needs. This sets out that: "local housing need outstrips housing supply from 2020/21 onwards, with the gap widening until there is a total shortfall of 38,595 homes in 2038/39. This shortfall represents 51% of the total need for 76,076 homes over the period 2020-39".

For Dudley, the assessment identifies a potential capacity of 11,064 dwellings which means that there remains a need to identify additional land and sites to meet housing needs.

One of the Government's principal objectives set out within the National Planning Policy Framework (NPPF) is to significantly boost the supply of housing and requires that; "strategic policies should, as a minimum, provide for objectively assessed needs for housing…" (Para 11a)

It is important to note that the NPPF is clear that the standard method's local housing need is only intended to be a minimum figure. The 2020 PPG states that there will be circumstances when a higher figure than that generated by the standard method might be considered. This is because SM2 does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates, including taking on the unmet need from neighbouring authorities[2].

In addition to the unmet housing need within the Black Country, it should also be noted that the very significant challenge of meeting Birmingham City's unmet need has not fallen away. At present Birmingham City Council is currently reviewing their Local Plan, the recent Issues and Options consultation (December 2022) identified an overall housing shortfall of c.78,000 dwellings. This will put even greater pressure on districts in the HMA such as Dudley to contribute an even greater share of this housing need.

It will, therefore, be necessary to explore whether an uplift to the LHN for DMBC is needed to ensure that enough homes are planned to accommodate needs across the BCA areas and the GBBCHMA.

Exceptional Circumstances

The NPPF is clear that "once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." (paragraph 140).

In respect of the 'exceptional circumstances' required to review the Green Belt, the council should have regard to the acuteness of their own housing need and availability of land to meet these needs. This is particularly important as both the Council and constituent Black Country authorities are constrained by Green Belt.

In this context, in the Calverton Parish Council v Nottingham City Council High Court Judgment case, the Judge pointed to the acuteness of the objectively assessed housing needs when considering whether housing need should be considered an exceptional circumstance (Para 51).

The Framework states that Green Belt boundaries should only be altered in exceptional circumstances. It is clear that such circumstances exist in the Black Country and the authorities including Dudley have previously discharged their obligation in paragraph 141 of the Framework to consider "all other reasonable options for meeting its identified need for development".

It has already been identified within the Black Country Urban Capacity Study May 2021 that insufficient housing land supply exists to meet the housing needs within Dudley and the wider BCAs .

The Black Country Councils' Urban Capacity Review concluded at paragraph 4.7 that given the findings of the urban capacity evidence, it is reasonable to conclude that the exceptional circumstances necessary to trigger a Green Belt review, in order to meet housing and employment land needs, have been met.

There is a clear and compelling need for the Black Country Authorities to address the arising unmet housing need through Green Belt release to ensure that sufficient housing land is provided. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts such as Dudley.

In order to meet the housing need as well as the arising unmet need, it is considered that the Clent View Road Site should be allocated for residential development as part of the emerging Dudley Local Plan.

Will Taylor Wimpey invest in Dudley?

Like many areas in the UK, Dudley is expected to experience a shortfall in available non-Green Belt land to meet future development needs. If this issue is not addressed there will be a clear imbalance between supply and demand with insufficient houses coming onto the local property market and there will be limited opportunities for prospective purchasers. As a consequence, this makes Dudley an attractive market for Taylor Wimpey to invest in.

About Taylor Wimpey

Taylor Wimpey UK Limited is a dedicated homebuilding company with over 126 years' experience; we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes. We draw on our experience as a provider of quality homes to meet the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry. Our 22 regional businesses in the UK give our operations significant scale and national geographic coverage.

With unrivalled experience of building homes and communities Taylor Wimpey continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction.

Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc.

Taylor Wimpey's development experience

Taylor Wimpey Strategic Land (Midlands and Wales) is responsible for the promotion of future development opportunities, such as this Site through the planning system. Taylor Wimpey Strategic Land has a large active land portfolio of Brownfield and Greenfield Sites in the West Midlands varying from 5-250 acres which are at various stages of the planning system.

Taylor Wimpey is the largest and most successful developer/promoter of Strategic Land in the Country. More specifically, over the past 5 years in the West Midlands, Taylor Wimpey Strategic Land has secured permission or allocations for c. 8,000 new homes. This successful strategy comes from ensuring a close working relationship with landowners, Local Authorities, politicians and local communities.

4

4.0 What are the Planning Objectives

4.0 What are the Planning Objectives

Planning Policy

The Framework outlines the Government's commitment to boosting the supply of housing and ensuring that land allocated for development is deliverable and can support the provision of affordable homes.

The Framework stresses the "presumption in favour of sustainable development" with development meeting social, economic and environmental objectives. In this context the Framework promotes the delivery of sufficient housing to meet the needs of the local community, as informed by local housing need assessment (using the standard method in national guidance).

The Framework highlights that an essential characteristic of Green Belts is their permanence. As a consequence, changes to Green Belt boundaries will only be appropriate where "exceptional circumstances are fully evidenced and justified".

Stourbridge is identified within the adopted Black Country Joint Core Strategy [BCJCS] as a Town Centre, which provides for convenience shopping as well local comparison shopping opportunities, local services and local leisure facilities, and are key areas in the settlement hierarchy below Strategic Centres. The provision of housing at Clent View Road will assist in maintaining Stourbridge's role in the settlement hierarchy of Dudley and will enable residents with easy access to the higher order services it provides.

The Site is sustainably located and benefits from access to an established and attractive active travel route (Roman Road) for walking and cycling. A number of schools and local facilities including Stourbridge Town Centre are located within a convenient distance from the site. Development of the Site will assist in the delivery of housing and provide additional benefits for the local community in terms of recreation provision and increased access to greenspace.

Sustainable Development

The Framework explains that the purpose of planning is to help achieve sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **Economic role –** contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available.
- **Social role –** supporting strong, vibrant and healthy communities.
- **Environmental role –** to protect and enhance our natural, built and historic environment.

Would the development harm Green Belt purposes?

In delivering sustainable development, the Framework attaches great importance to the Green Belt. 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. The Framework defines a series of tests to demonstrate whether "exceptional circumstances" exist to justify revisions to the Green Belt boundary.

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. This includes:

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

The Framework indicates that when drawing up Green Belt boundaries, the Council should consider the need to promote a sustainable pattern of development, channeling 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.

The Black Country Green Belt

The Dudley Green Belt comprises a relatively narrow fringe of countryside within its boundaries to the south, and west of the urban area.

LUC have completed Green Belt Studies on behalf of the Black Country Authorities (September 2019) as part of the evidence base to inform the Local Plan Reviews. The part of the site which lies within Dudley forms part of a longer parcel of land extending to the north [Sub Parcel Ref B59A – Roman Road] in the Black Country Green Belt Study.

The Study notes that the sub-parcel makes a strong contribution to preventing sprawl of the West Midlands conurbation to the east and to preventing encroachment on the countryside, and a moderate contribution to maintaining the separation of Stourbridge and Kidderminster (via intervening settlements). It concludes that no Green Belt land in the Black Country contributes sufficiently to the setting or special character of any town within or around the study area, to make more than a weak contribution to Green Belt Purpose 4. It also concludes that all Green Belt land within the Black Country makes a strong contribution to urban regeneration (Purpose 5).

Taylor Wimpey considers that the land at Clent View Road would perform a limited contribution to the five tests if it were to be reviewed on a site-specific basis. An assessment of the Site's compliance with the five Green Belt purposes is therefore set out below.

Figure 3: Green Belt Impact Plan

Compliance with the five Green Belt purposes

The following assessment considers the Site against the five purposes of the Green Belt to establish its suitability for Green Belt release. These five purposes are:

1. **To check the unrestricted sprawl of large built up areas;**
2. **To prevent neighbouring towns from merging into one another;**
3. **To assist in safeguarding the countryside from encroachment;**
4. **To preserve the setting and special character of historic towns;**
5. **To assist in urban regeneration by encouraging the recycling of derelict and other urban land.**

To check the unrestricted sprawl of large built up areas

The site comprises a land parcel which is adjacent to the existing urban area to the east of the site. The west boundary of the site is bound by greenfield land; Several buildings are located further afield to the west (Frog Hall Cottages) and south-west (High Lodge Care Services). The greenfield land bordering the western boundary of the site has a strong woodland boundary, and is further bound to the north by an access road, and to the south by a line of mature trees, hedgerows and an access road, with High Lodge House beyond. The same access road bounds the site to the south-west.

These physical features provide strong, enduring 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.

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 merging of settlements and would retain a significant gap of approximately 3km between Stourbridge and Kinver. In addition, a gap of approximately 5.3km between Stourbridge and Kidderminster would be retained. The woodland planting to the west and the access road to the south provides a permanent defensible boundary and would ensure that a gap can be retained.

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 the access road to the south and south-west provide strong, established boundaries, and the site is bounded to the north by an access road.

The development would result in some encroachment into land which presently is countryside, though it is immediately adjacent to the existing urban area and a sympathetic layout which 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.

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.

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 Dudley, as there is insufficient previously developed land available to meet future housing requirements.

The Black Country Urban Capacity Report concludes that the amount of housing need which cannot be accommodated in the Black Country urban areas remains significant, at around 36,819 homes. The Draft BCP fails to adequately address this matter in the Green Belt releases it identifies and a significant shortfall of 28,239 homes remains. Further Green Belt release is necessary in order to address this shortfall. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts.

Therefore, there is a requirement for the identification of new sites on land outside the urban area that are not currently proposed for development. Further land will need to be removed from the Green Belt to meet housing needs.

5

5.0
What is the Vision?

5.0 What is the Vision?

Place Making

Taylor Wimpey's vision for the Site is:

"A sustainable, distinctive and attractive, residential development which will help meet the needs of the community for new housing, retain, protect and enhance key features of the landscape and complement existing development in the local area".

The Masterplan

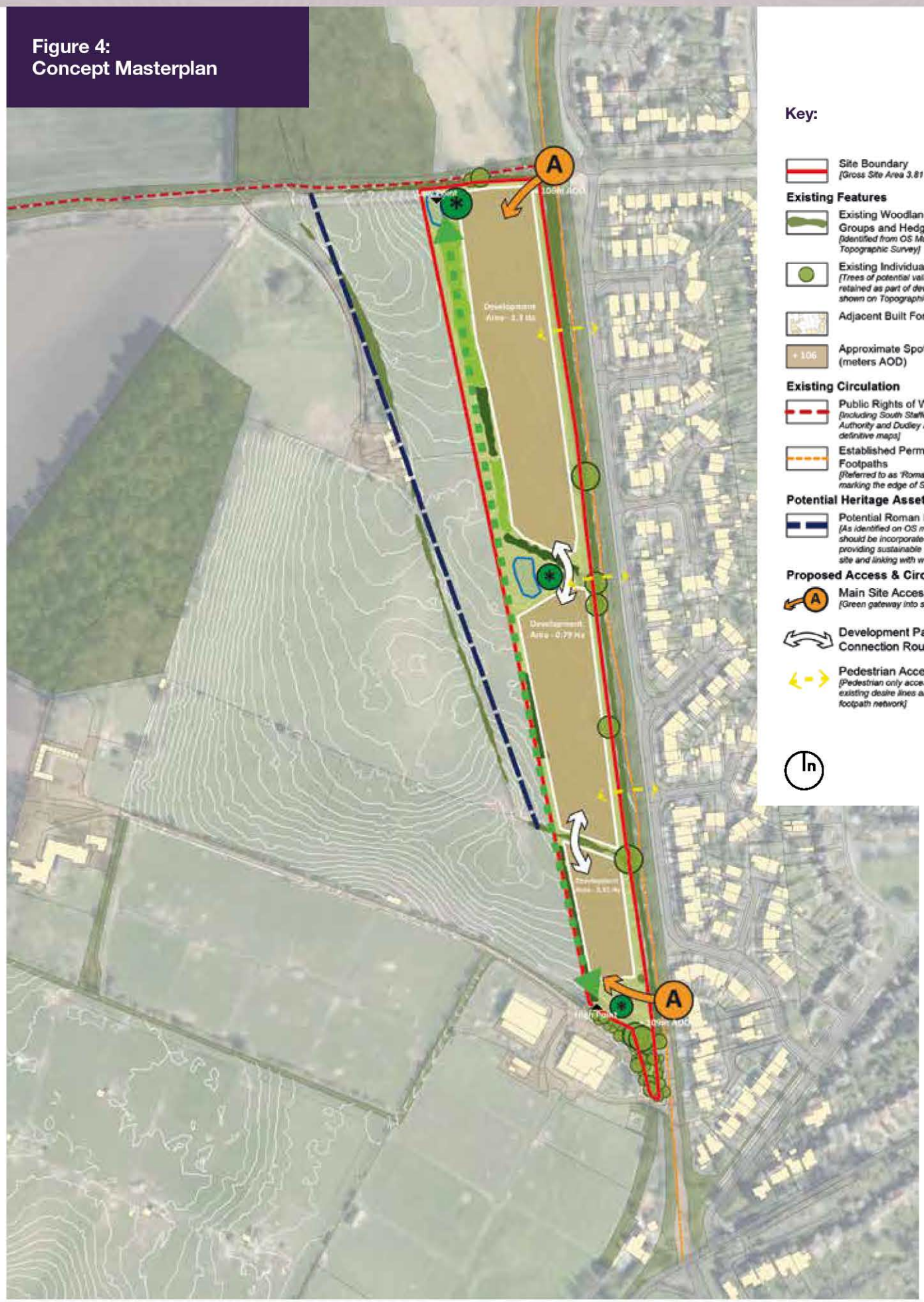
The masterplan seeks to retain and enhance the existing attributes of the Site whilst also delivering a high-quality development capable of helping to meet local housing requirements. Development has been set back from the established hedgerows and tree belts which define the edges of the Site to create a network of green open spaces to include POS and native and naturalised planting for the use and enjoyment of local residents. This will help to mitigate the visual impact of the development when viewed from surrounding countryside, as well as providing a sensitive interface between the urban form and surrounding open space.

Naturalised attenuation basins would be provided at the lowest edges of the Site, allowing for the provision of sustainable drainage techniques, whilst also creating further biodiversity value to help support local wildlife and habitats.

The inner areas of the Site have been utilised for a high-quality residential development with the primary vehicle and pedestrian access points proposed off Clent View Road. The scheme will deliver the following key features:

- Up to 80 high quality homes suitable to the needs of the local community with a varied mix of house type, tenure and size.
- A network of safe and attractive Public Open Spaces, including open grassland incorporating native and naturalised planting running along the periphery of the Site for use by local residents and local wildlife alike.
- A legible and attractive hierarchy of routes throughout the Site including high quality pedestrian routes running through the Site as well as a series of well-designed streets and lanes providing users with attractive and safe connections throughout the development.
- A variety of pedestrian connections to the surrounding area and the public bridleway to the north.
- A layout which would provide natural surveillance across all areas of public spaces whilst clearly defining private rear gardens.

Figure 4: Concept Masterplan



Constraints and Opportunities

The place-making vision for the Site derives from an analysis of the characteristics for the Site, its context, and the opportunities and constraints which arise.

The constraints are:

- The eastern boundary of the Site is defined by a number of existing properties which face onto the Site. Whilst these properties are separated from the site by Roman Road, their existing boundaries are low with a majority of the houses currently overlooking the Site. Opportunities therefore need to be explored to ensure the development of the Site can be delivered in a way which is sensitive to the visual and residential amenity impact upon these properties.
- Clent View Road running to the east of the Site represents the only opportunity to gain vehicular access into the Site. Clent View Road has the capacity to accommodate the additional traffic/ vehicle flows associated with the development on the Site.

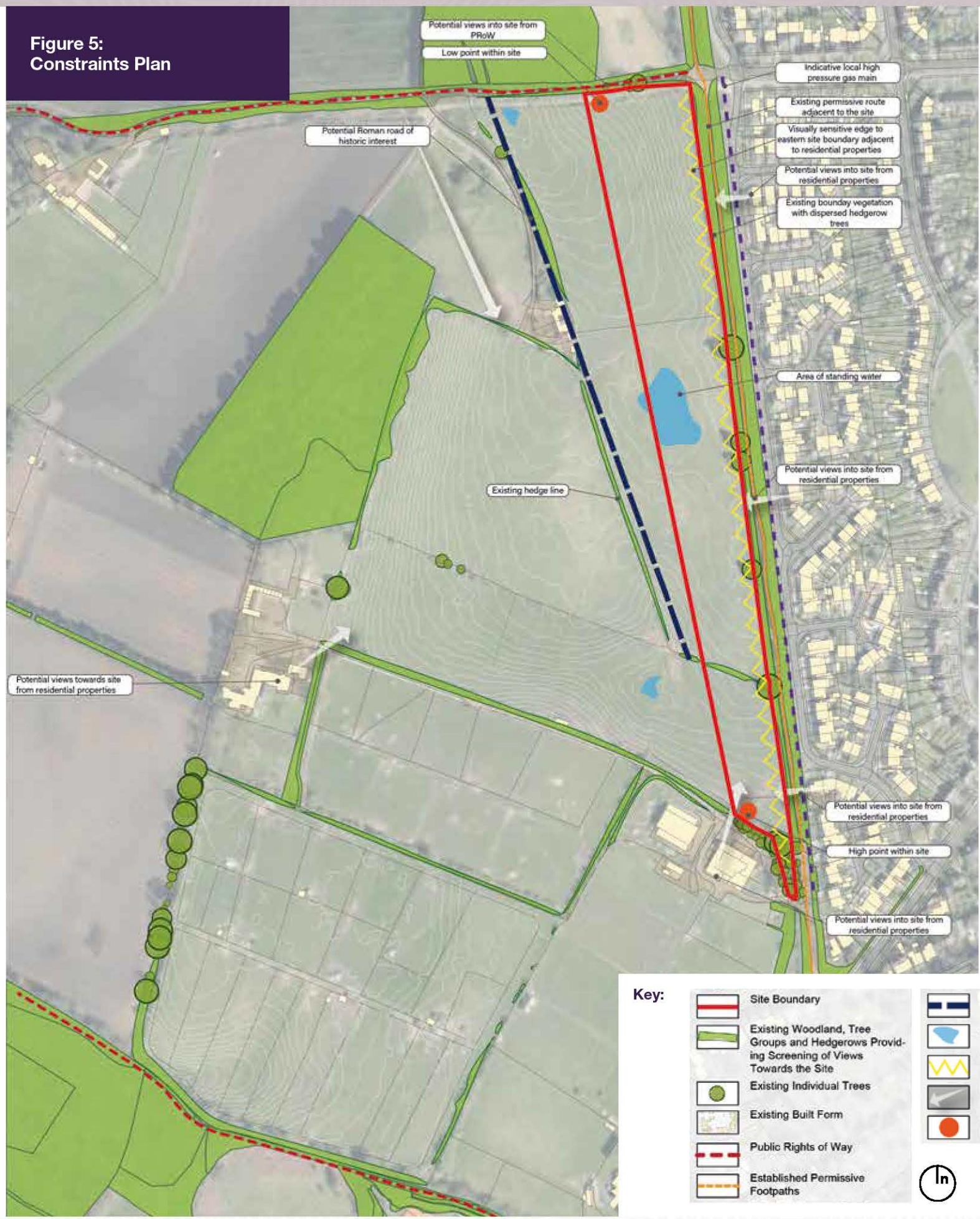
The opportunities are:

- To respond to the Site attributes to provide a development which is specific to its context and responding to the needs of the local community.
- The retention and enhancement of the existing tree belts and hedgerows which run along the boundaries of the Site to improve levels of Site containment and mitigate visual impact.
- To provide safe and attractive pedestrian accesses into the Site from Clent View Road and the adjacent and public footpath.
- To utilise the Site to provide a high-quality landscape driven development which embraces the green assets to deliver a residential development within a network of high-quality greens, routes and spaces.

The key principles of development arising from the Site opportunities and constraints are:

- To create a development which is specific to Stourbridge by sensitively responding to the unique attributes and characteristics of the Site and its wider context.
- To provide safe and convenient access for both new and existing residents to local amenities and facilities through the delivery of public open space and pedestrian connections to Clent View Road and the public footpath adjacent to the Site leading to Iverley Heath and Bunkers Woods.
- To provide a sufficient quantity of green space benefiting residential amenity as well as biodiversity net gain.
- To provide green gateways into the site along the main accesses, with the opportunity to create tree lined streets to contribute to the character and quality of the development and help mitigate and adapt to climate change.
- To provide a development of suitable scale, form and appearance which meets both the needs of the local community in a sustainable way, whilst also being sensitive to the character of the surrounding townscape and landscape setting.
- To retain, enhance and embrace the Site's natural assets through the inclusion of naturalised green infrastructure including wetland attenuation basins, managed wild grasslands and the planting of native shrubs/trees to contribute to a well-designed and beautiful place in accordance with the Framework.

Figure 5: Constraints Plan



6

6.0
Can the Vision be Delivered?

6.0 Can the Vision be Delivered?

Is the site available?

The proposed allocation and development of the Site:

- Will make a valuable contribution towards meeting the quantitative and qualitative needs of the community for market and affordable housing. It could deliver a up to 80 high quality family houses.
- 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.
- Is not subject to any known constraints that would impede deliverability. There are no legal impediments, or any need for land in third party ownership. The Site is therefore fully deliverable.

Is the site suitable?

- The Site is located to the west of the residential area of Stourbridge in close proximity to a number of services and facilities in Stourbridge. Schools, shops, residential communities, and leisure facilities are all accessible by a choice of means of transport, including walking and cycling.
- Stourbridge Town Centre is approximately 30 minutes walking distance from the northwest of the site where access to Stourbridge Town railway station is also available. Stourbridge Junction rail station is located approximately 3km from the proposed site and provides regular services to nearby and well-connected stations including Birmingham New Street, Kidderminster, Solihull, Worcester Shrub Hill, and Stratford-Upon-Avon.
- The site is situated is situated 0.4km from Shenstone Avenue bus stop, which provides regular services to the centre of Stourbridge and Dudley.
- Stourbridge is identified within the adopted BCJCS as a Town Centre, which provide for convenience shopping as well as local comparison-shopping opportunities, local services and local leisure facilities, and are key areas in the settlement hierarchy below Strategic Centres. 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 Dudley.

Is the development achievable?

- The Framework [Annex 2] 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 is no overriding constraint that will impede its delivery.
- 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.

Is the Development Viable?

- Taylor Wimpey has reviewed the economic viability of the proposals in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales; as well as the cost factors associated with the Site including site preparation costs and site constraints. Where potential constraints have been identified, Taylor Wimpey has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers.
- Taylor Wimpey confirms that the development of the Site is economically viable and is confident that residential development can be achieved within the first five years of the plan period.
- The Site is under the control of a major housebuilder. It is not subject to any significant technical or environmental constraints that will prevent it coming forward for housing.

7

7.0
Does the Scheme Represent Sustainable Development?

7.0 Does the Scheme Represent Sustainable Development?

Sustainable Location

A key element of national and local policy is to ensure new developments are located in areas where alternative modes of travel are available. It is also important to ensure that developments are not isolated but are located close to complementary land uses.

The Site will form a sustainable urban extension to Stourbridge and benefits from being in close proximity to a range of local services and facilities together with employment and education opportunities. This Vision Statement demonstrates the level of accessibility provided by sustainable modes of transport, including pedestrian and cycle infrastructure and public transport. These provide good, sustainable links to key services and facilities in the surrounding area.

These services are illustrated by the Sustainability Plan, and include the following:

- Gig Mill Primary School
- Ridgewood High School
- Stanley Road Playing Fields
- Stourbridge Lawn Tennis and Squash Club
- Co-op Convenience Store
- Post Office
- The Greyhound Pub
- The Broadway Pharmacy
- Norton Medical Practice

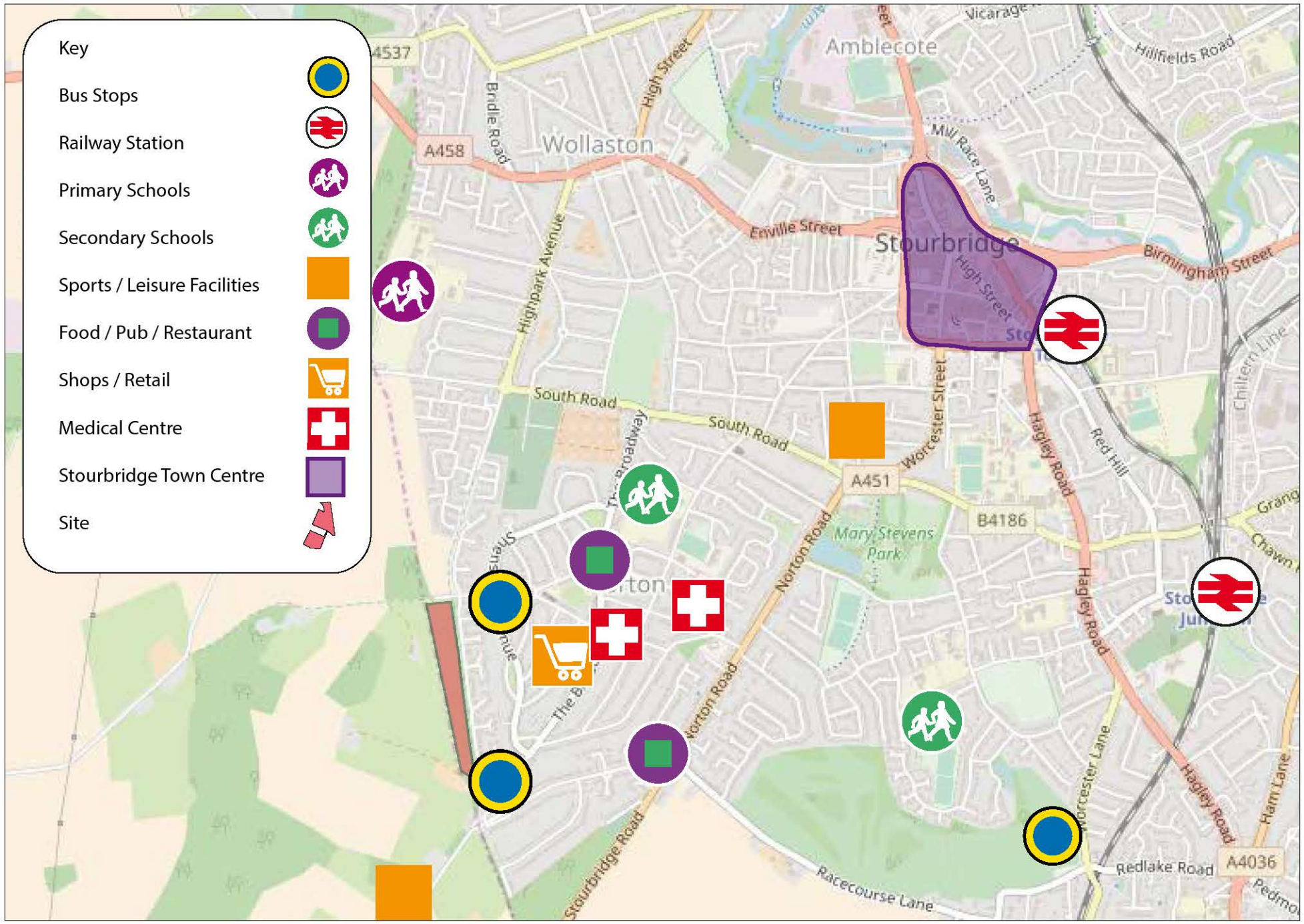
Sustainable Development

The Framework explains that the purpose of planning is to help achieve sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **Economic role –** contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available.
- **Social role –** supporting strong, vibrant and healthy communities.
- **Environmental role –** contributing to protecting and enhancing our natural, built and historic environment.

The future development of the Site will have positive economic, social and environmental benefit and therefore constitutes sustainable development in accordance with paragraph 7 of the Framework.

Figure 6: Sustainability Plan



Economic Benefits

Up to 80 new homes offers the opportunity for economic growth, will assist in meeting Dudley's objectively assessed housing need and add to the local authority's revenues.

Economic Role

The development of the Site will contribute towards building a strong, responsive and competitive economy. The proposal will bring a number of economic and fiscal benefits in terms of job creation, additional monies to the Local Authority and increased expenditure in the economy.

The Site is sustainably located in close proximity to a designated Town Centre. The delivery of high-quality housing in the locality will contribute to ensuring that population growth is focused in an area close to employment opportunities, which can be easily accessed via a sustainable transport network.

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.

Social Role

The development of the Site will support the creation of a strong, vibrant and healthy community by increasing the supply of housing in a sustainable location. The proposed development will comprise a high-quality built environment and has been designed to meet the needs of the area and complement the character of the surroundings.

The revised Framework places particular emphasis on the following social aspects of sustainable development:

- Ensuring a strong mix of housing is provided, to ensure inclusive growth and enable all groups of the population have access to appropriate housing which directly meets their needs;
- Delivering housing in the right places to ensure communities have access to employment and local facilities and services; and,
- Ensuring the development of high-quality, distinctive and well-designed places which create a sense of place within the community.

The proposals respond effectively to these objectives outlined by national policy. The future development of the Site will:

- Provide a suitable range of dwellings in various types, sizes and tenures to meet the needs of the local population, and establish a mixed and sustainable community;
- Deliver units as affordable housing to meet identified local need;
- Provide opportunities for residents to work in surrounding areas, including Stourbridge Town Centre, utilising the Site's sustainable location and excellent connectivity via surrounding networks;
- Facilitate the use of non-car modes of transport, especially cycling and walking; and
- Provide public open space for both existing and future residents.

Environmental Role

The Site is currently in agricultural use and is considered to be of limited ecological value.

Although the proposed development will involve the loss of greenfield land, the 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 where possible within the proposed development supplemented with further planting to help screen the site and integrate it with surrounding assets. The site extent allows the opportunity to provide wide-ranging enhancements to demonstrate a 'biodiversity net gain'.

The proposed scheme includes provision of Public Open Space, the northern and central parts of the site incorporate areas of attenuation. The scheme also includes areas of open space along the boundaries and responds to the environmental features adjacent to the borders of the Site with appropriate landscaping.

Stourbridge is identified as a Town Centre within Dudley and includes a range of employment opportunities, as well as retail, education and other services that serve a wide area. The Site also benefits from excellent public transport links and connectivity to the strategic road network.

The Site is sustainably located on the edge of an established settlement. Local services and amenities are well situated in Stourbridge. All facilities are within suitable walking distances (up to 2km walking distance). Existing public transport services close to the Site serve a wide area and allow for the opportunity to utilise sustainable methods of transport.

No environmental constraints have been identified that would inhibit the future allocation and development of the Site.

The proposed development will meet the Government's objectives for sustainable development by providing significant economic, social and environmental benefits.

Figure 7: Economic Benefits

The proposed development will provide 80 new homes, stimulate economic growth, assist in meeting Dudley's housing requirements and add to the authorities' revenues.

The proposal

80 New homes

30% Affordable homes

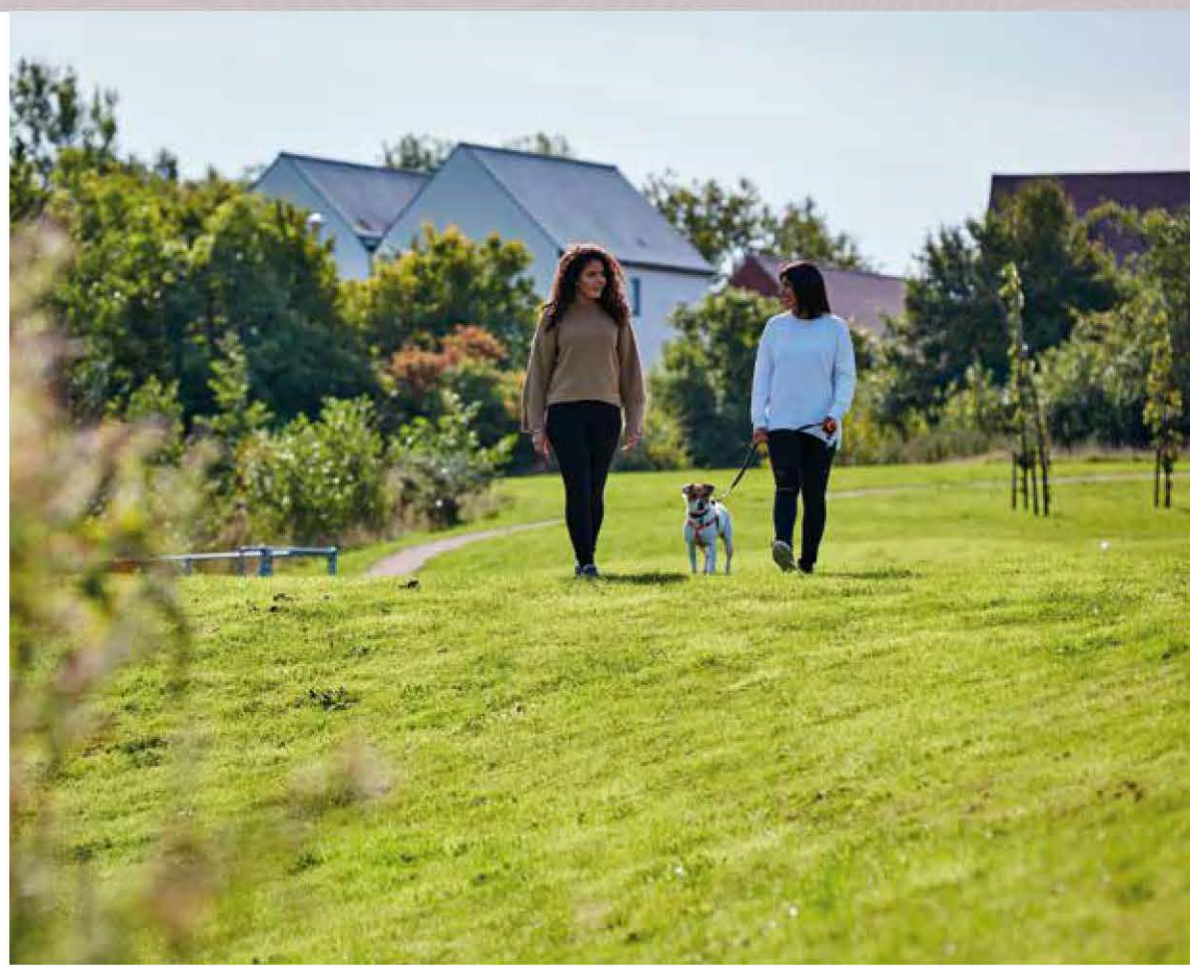
Construction benefits

Operational and expenditure benefits

Local Authority revenue benefits

8

8.0 Delivery Trajectory



8.0 Delivery Trajectory

The proposed development comprises land fully under the control of Taylor Wimpey who intend to deliver new housing on the site subject to securing a strategic allocation for new housing development and the removal of the site from the Green Belt.

To be considered deliverable, sites should offer a suitable location for development, be readily available and be achievable with a realistic prospect that new housing will be built within the first few years of the local plan period. The technical analysis supporting the Concept Masterplan has demonstrated that the site is highly deliverable and that there are “no showstoppers” that would prevent the site being allocated for development.

The site is achievable and can be brought forward for development into the first few years of the new Dudley Local Plan, in alignment with the following indicative sales trajectory:

Year:	2026/27	2027/28
Completions:	40	40

Importantly, the site is viable and will deliver the key community, social, and physical infrastructure required to meet the needs of new residents. This will include affordable housing and open space, along with necessary developer contribution to social and community or physical infrastructure.

9

9.0 Summary


Taylor
Wimpey

9.0 Summary

The Clent View Road, Stourbridge Site should be removed from the Green Belt and allocated for housing. This Delivery Statement has clearly demonstrated that the Site represents an excellent opportunity to deliver a sustainable residential development.

Suitable

The Black Country Authorities have previously indicated that exceptional circumstances exist to justify the release of land from the Green Belt:

- It has been identified that there is inadequate land within the urban area to meet emerging housing needs. In addition, the Black Country Authorities are unable to identify sufficient land to meet the minimum local housing need of 76,076 homes. Further Green Belt release is necessary in order to address the acute unmet housing needs. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts.
- Land will need to be removed from the Green Belt and safeguarded to meet development needs beyond the plan period. The Site should be allocated for residential development.
- The Site is predominantly contained by development and strong boundaries. The allocation and future development of the Site provides an opportunity to create a long-term defensible boundary to Stourbridge.
- It is anticipated that the Dudley Local Plan review will be completed by 2025. The Clent View Road Site should be allocated for residential development to meet needs from 2025.

Sustainable

The allocation and future development will:

- Provide a catalyst for economic growth providing significant economic, social and environmental benefits to the residents of Dudley.
- Meet the Government's objective for creating sustainable development.

Deliverable

The Site is:

- Not the subject of any technical or environmental constraints that would prevent it coming forward for housing development.
- Under the control of a major house builder. If the Site is allocated, Taylor Wimpey will bring forward the total amount of housing proposed on the Site over the next 5 years.

Exceptional circumstances exist to justify the release of the Site from the Green Belt. There is an acute need for housing emerging in Dudley and the Black Country and thus further Green Belt release is required. This is even before the very significant unmet need in Birmingham is taken into account, which will necessitate even higher levels of provision in HMA districts. The Site no longer serves the purposes of the Green Belt as set out in the National Planning Policy Framework. Removing the Site from the Green Belt will have limited impact on urban form and landscape character. The Site should be allocated for housing in the emerging Dudley Local Plan to deliver much needed housing.

Taylor Wimpey

Land at Clent View Road, Stourbridge

Vision Statement

March 2023

Published by Taylor Wimpey UK Limited

Birmingham
0121 713 1530
birmingham@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk