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Planning Policy
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BY EMAIL: sandwell_localplan@sandwell.gov.uk

Dear Sir / Madam

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

Harris Lamb Planning Consultancy are instructed by Clowes Developments (UK) Ltd, hereto referred to as Clowes, to submit representations to the Sandwell Local Plan Preferred Options and welcome the opportunity to comment at this time. Clowes Developments are current promoting sites in South Staffordshire on the edge of the conurbation. This representation focuses on their site to the north of Wall Heath, along the A491/Wolverhampton Road, which is being promoted for employment land (see Figure 1 below for the indicative masterplan). Consequently, this representation explores the employment aspects of the draft plan, the significant requirement for land outside of Sandwell to meet the employment need that has been identified, and the importance of meaningful discussions with those nearby authorities who have the land available to reasonably assist with meeting this need.

A substantial shortfall and need to find a definitive solution.

The draft plan identifies a shortfall of 143 hectares (ha) of employment land, before the projected loss of 26 ha of employment land is accounted for. This is a substantial amount of land and represents a substantial number of jobs for local people that have yet to be accounted for.

Clowes would like to implore the Council to enter constructive and productive discussions with nearby local authorities who have the capacity to assist in meeting this shortfall; with South Staffordshire being the top of the list due to its proximity to Sandwell and the existing functional relationship with it. None of the authorities directly adjoining Sandwell purport to have the land available to meet their own needs, and any land that might be identified within these to assist other authorities as their plans progress will not even beginning to scratch the surface of the level employment land needed. Consequently, it will be necessary to speak with next layer of authorities, including South Staffordshire, to meet this significant unmet need.

Meeting the employment needs across the conurbation cannot be achieved on an authority by authority basis and a joined up approach that crosses administrative boundaries will be required if there is to be any chance of meeting the employment needs both in terms of quantum and the required mix, including land for smaller and medium sized local businesses that form important roles in the local economy and the supply chain for larger businesses.

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It is our view that the focus for addressing the shortfall of employment land in Sandwell should be those authorities closest to them. South Staffordshire and Bromsgrove are the closest authorities with a meaningful ability to address the shortfall. South Staffordshire is yet to submit its local plan review to the Secretary for State for examination and there is still scope to hold meaningful discussions with them to provide land to meet the needs arising in Sandwell. Discussions will have already taken place with South Staffordshire through the Black Country Plan review, and Clowes would like to highlight the importance of Sandwell taking these discussions forward and re-emphasising the importance of South Staffordshire's role if the employment needs in Sandwell are going to be met.



Figure 1: Indicative Masterplan

Meeting the needs of all part of the economy

In addressing the employment land shortfall, it is important that an appropriate range of land and locations are identified to meet the needs of the different type and size of employment occupiers.

Through the Black Country plan review, discussions with South Staffordshire had led to an extension to i54 and a proportion of the Four Ashes interchange going toward meeting the overspill from the Black Country. Whilst these will no doubt continue to play an important role in meeting the wider need from the Black Country, this still leaves a substantial unmet need and it put a focus on sites to the north of the conurbation for larger national and international operators.

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

Land at Wall Heath

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

The Site is deliverable, on a principal commuting route on the edge of conurbation and is one of the closest sites with the potential to deliver a meaningful contribution to the unmet employment need in Sandwell. It would provide the perfect opportunity for local and regional companies to locate and would build on the success of the Pensnett Trading Estate where the available capacity is less than 5%.

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

The Draft Plan

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

Chapter 1, Sandwell 2041: Spatial Vision Priorities and Objectives

Ambitions 1, 3 and 9 all state “*delivering a healthy supply of land for economic growth and employment*”. Harris Lamb supports the proposed wording on account that it is consistent with “*Building a strong, responsive and competitive economy*” as one of the three overarching objectives of the National Planning Policy Framework. It is however evident that the Plan as drafted is likely to fail to deliver on this aspiration as the proposed supply of employment land i.e. 42 hectares is significantly less than the identified need / requirement of 211 hectares (includes 26 hectares likely to be lost to other land uses) as set out in the Employment Land Needs Assessment 2020 to 2041 (August 2023).

Chapter 1, Priorities and Objectives: Table 3

Objective 8 “grow a prosperous and resilient local and regional economy”. Whilst Harris Lamb supports this objective again the substantive and significant proposed shortfall in employment supply, particularly in the context of the wider FEMA and the local authorities beyond which evidently have a strong functional relationship with Sandwell e.g. South Staffordshire.

Chapter 2, Spatial Strategy

At paragraph 2.3 it states that the spatial strategy took account of, amongst other matters, the evidence base. Harris Lamb considers that the evidence base is deficient in that it did not include a review of the Green Belt. Nor is it evident how or indeed if the West Midlands Local Industrial Strategy (2019) was considered.

Paragraph 2.14

Notwithstanding the stated demand for employment land and the shortfall are both substantive and significant, they do not account for the projected loss of employment land to other uses i.e. 26 hectares. Harris Lamb also objects to the statement that the Plan allocates.

Paragraph 2.15

Harris Lamb supports the statement “*ensuring that an adequate supply of employment land is maintained through the plan period will be essential in enabling long term balanced growth to be sustained*”. It then identifies “key issues to be addressed in the SLP” but it fails to include the need to secure employment land elsewhere in, and beyond, the FEMA e.g. South Staffordshire to address the substantial and significant supply shortfall.

Balanced Green Growth, Paragraph 2.30h

Harris Lamb supports the statement “*regenerate existing employment areas and help them deliver*”. To enable to achieve that however new employment land needs to be identified as vacancy rates are very low, typically less than 10%, meaning that existing tenants are more likely to relocate further afield.

Chapter 3, Development Strategy Policy SDS1

Part 1b

Part 1b is very misleading. It states that at least 1,206 ha of employment land will be provided but all of it bar 29ha is existing employment land. The proposed supply is only 42 hectares of which 26ha are new allocations (“new urban sites”).

Part 1h

Harris Lamb objects to the blanket policy approach i.e. no inappropriate development in it without any up-to-date technical evidence to justify it.

Duty to Cooperate Paragraph 3.14

Harris Lamb agrees that there is evidently a substantive and significant shortfall with the proposed employment shortfall. Again “an anticipated lead of allocations of 1,206ha of employment land” is simply incorrect as nearly all of it is currently occupied. Further the shortfall of 143ha does not account the 26ha projected loss of employment land to other uses.

Paragraph 3.15

This is a correct application of NPPF’s policy. It should state here which local authority areas have a physical or functional relationship with Sandwell. One area is evidently South Staffordshire where there is a strong commuting pattern in both directions.

Paragraph 3.17

It is evident to date that the employment land shortfall falls well below the existing and anticipated contributions from other Local Planning Authorities. The scale of the shortfall, along with the even greater shortfall in respect of housing, means that for greater contribution from appropriate local authority areas e.g. South Staffordshire is necessary.

Paragraph 3.18

Ongoing “engagement with its neighbours to secure the most appropriate and sustainable location for housing and employment growth to meet local needs” is clearly not enough as all the neighbouring LPAs are also struggling to meet their own needs, especially so Birmingham. Therefore, it should state the LPAs which could provide a substantive and appropriate contribution including South Staffordshire.

Chapter 8, Sandwell's Economy – Paragraph 8.4f

“The Plan will allocate 1,206 hectares of occupied employment land for strategic, local or other employment provision”. As it stands the SLP only allocates 26ha of new employment land.

Paragraph 8.5g

The proposed objectives do not include working closely with LPAs, who have a strong functional relationship with Sandwell, to identify appropriate areas of land on which to address some of the substantive and significant employment land shortfall.

Policy SEC1 – Providing for Economic Growth and Jobs

Part 1

It should state how much new employment land is being allocated.

Part 2

This is overly optimistic. Redevelopment of employment land is limited on account of very low vacancy rates. There is also very limited scope for “intensification” of employment sites to deliver substantive new employment space as the gross to net plot ratios tend to be very low.

Summary

There is a significant shortfall in employment land in the Preferred Options local plan. This land represents jobs for local people and is important for bolstering the strength of the local economy for the benefit of all. Not providing this land will have a negative impact on local people and it is local people who will suffer if a solution cannot be found.

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

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

Yours sincerely

Sam Silcocks BSc (Hons) MA MRTPI
Director