



Our Ref: P2087/JP/SH/hr
Date: 18th December 2023

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Dear Sir / Madam

**Sandwell Local Plan Preferred Options Consultation
Response by Monarchi Developers Limited
Land at St Brades Close, Tividale**

Harris Lamb Planning Consultancy are instructed by Monarchi Developers Limited (**'the Representor'**) to submit representations to the Sandwell Local Plan Preferred consultation document. The Representor has controlling land interest at St Brades Close, Tividale. I have attached to this letter a plan identifying the location of the site (Appendix 1). It is our view that this site should be identified as a residential allocation in the emerging Local Plan to help meet the significant housing shortfall.

Housing Delivery

The proposed development strategy in the Local Plan identifies a housing requirement of 29,773 dwellings to meet the minimum Standard Method housing needs figure. It is, however, advised that there is only available capacity to deliver 11,167 of these dwellings in the Plan area, leaving a shortfall of 18,606 dwellings. There are only two solutions for addressing the shortfall. Either Sandwell need to allocate additional sites within its administrative area, or the Council need to reply upon neighbouring authorities allocating land for development to meet the unmet housing need.

There is no evidence to suggest that neighbouring authorities will be able to provide significant support to meet Sandwell's housing shortfall. Indeed there is a significant shortfall in the wider Housing Market Area due to a shortfall of housing sites. As a consequence Sandwell should actively make additional housing allocations in the meeting Local Plan.

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The housing shortfall arising in Sandwell is reflected elsewhere in the Housing Market Area with the matter of unmet need arising specifically from Birmingham City well established. The Birmingham Development Plan ("**BDP**") was adopted in January 2017. Policy PG1 – Overall Levels of Growth, advised that 89,000 dwellings are required during the course of the plan period (2011 to 2031) to meet the growth requirements of the City. However, only 51,100 additional dwellings can be accommodated within the City's administrative area. This leaves a shortfall of 37,900 homes including 14,400 affordable homes (that will need to be delivered elsewhere within the Greater Birmingham Housing Market Area). The BDP stipulated that Birmingham's unmet need should be met by other authorities in the HMA as and when they produced individual Local Plans. This has not happened.

Birmingham City Council has now commenced a review of its Local Plan. The City Council undertook Issues and Options consultation on a draft Plan in November and December 2022. The Issues and Options document advised that the Standard Method housing requirement for Birmingham for the period 2020 to 2042 is 149,286 dwellings. The Issues and Options consultation document suggests that the total capacity for development within the built up area of the City is 70,871 dwellings. This relies upon all SHLAA sites coming forward for development and the provision of a significant number of windfalls (the windfall sum is 11,675 dwellings). This would result in a housing shortfall in the City of 78,415 dwellings.

Birmingham City will clearly be unable to support the delivery of Sandwell's housing needs.

The other Black Country authorities are in a similar position. Previously, the four Black Country authorities had been preparing a Joint Plan which has now been abandoned in favour of the preparation of individual Plans for each authority. Notwithstanding the above, the Preferred Options Black Country Plan proposed a housing requirement based upon the Standard Method which was the sum of the four individual authority housing requirements. The housing requirement for the four authorities was 76,076 dwellings, however, there was only an identified capacity of 47,837 dwellings leaving a shortfall of 28,239 dwellings to be directed to other authorities.

Following the abandonment of the Black Country Plan each authority will calculate its own housing requirement using the standard method calculation. The requirement in Dudley is 11,954 dwellings however, Dudley claims it only has capacity to accommodate 10,876 of these leaving a shortfall of 1,076. The positions in Wolverhampton and Walsall have not yet been published although it is anticipated that there will be a further shortfall in what is required against the capacity within these two authorities, particularly in light of the shortfall that arose at the Black Country Plan Preferred Option stage.

The remaining Black Country authorities are unlikely to be able to assist Sandwell in delivering its unmet housing needs.

If the housing shortfall figure identified in Policy PG1 of the BDP and the emerging shortfalls in both the Dudley and Sandwell Preferred Options are added together it totals 57,582 dwellings. If the shortfall arising in Dudley and Sandwell is added to the emerging shortfall identified in the Birmingham Issues and Options this increases to 98,097 dwellings. As noted above, this has the potential to increase even further when any shortfall arising in Wolverhampton and Walsall is added.

Having regard to the Greater Birmingham Housing Market Area there are 14 authorities within it which include Birmingham, the four Black Country authorities and 9 other surrounding authorities. In light of the shortfall arising in Birmingham, Dudley and Sandwell this effectively leaves 11 remaining authorities where the need could be distributed.

Turning to each of the remaining authorities Redditch Borough is effectively built up to its boundary and already has to look to its adjoining neighbour, Bromsgrove, in order to accommodate its housing need. It would be unable to accommodate any further unmet need. Similarly, Tamworth had to look to its adjoining neighbours of Lichfield and North Warwickshire in order to meet its current housing requirement in its adopted Local Plan. It too would be unlikely to be able to accommodate any unmet need.

Cannock Chase's capacity is restricted due to environmental constraints including the Cannock Chase SAC and AONB. A small part of Stratford-upon-Avon District falls within the Housing Market Area whilst North Warwickshire have previously committed to delivering 3,790 dwellings to meeting Birmingham's needs up to 2031 in its adopted Local Plan (2021).

Solihull's Local Plan is currently at examination and is on hold awaiting publication of the updated Framework and currently proposes approximately 2,000 dwellings to meet the needs of Birmingham. If the Plan progress towards adoption in its current form there would be no scope to seek any increase in the size of the contribution from Solihull until such time as they commenced a further review. This effectively leaves Lichfield, South Staffordshire and Bromsgrove as the three remaining authorities that would be able to make any meaningful contribution to meeting housing needs arising in the wider HMA.

Lichfield has recently withdrawn its Local Plan and is now preparing a new Local Plan, whilst Bromsgrove had commenced a review of its Local Plan having undertaken Issues and Options consultation in 2018 with no programme for when the Preferred Options Local Plan is intended to be published for consultation. South Staffordshire have also consulted on a Pre-submission version of its Local Plan concluding in December 2022 that makes a contribution of just 4,000 dwellings to the overall shortfall. Sandwell should, therefore identify additional sites for housing within its own administrative area.

Land at St Brades Close, Tividale

Our clients land at St Brades Close should be allocated for residential developments to support housing delivery. It is in a highly sustainable location, immediately adjoining in an existing residential area. It is in close proximity to Oakham Primary School and the Portway Lifestyle Centre. There are a variety of services and facilities located on the A4123 – New Birmingham Road, to the north east that are within easy walking distance. Indeed, Oldbury Town Centre is approximately 1 mile from the site. Oldbury Town Centre provides a variety of services and facilities as well as employment opportunities.

The extent of the site being promoted for development means that there will be no functional harm to the area of public open space in this location. Indeed, the area is in private ownership in any event.

The topography in the area is challenging. As a consequence the Representer has commissioned DTA Transport Consultants to undertake an assessment of the access to the site and the ability to deliver roads of an adoptable standard as part of any residential development. The results of this work are attached at Appendix 2. DTA have concluded that a safe and convenient access to the site and a scheme can be serviced by roads of adoptable quality.

Ecology surveys have been undertaken to support the promotion of the site. It will be ensured that any development on the site achieves a minimum of 10% biodiversity net gain. The Representer has been in discussions with neighbouring landowners regarding the opportunity to enhance the wider sites ecological resource. As part of the development of this site ecological improvement and a management plan can be established for the wider area helping to safeguard and enhance its ecological potential.

There is the opportunity to create vehicular access from public roads to a smaller car park in close proximity to the site, making the wider site more accessible to the elderly and disabled to enjoy the benefits of the BBCWT land that currently is challenging to access. This is a significant social benefit.

Antisocial behaviour on site has been prevalent for many years, including substantial littering (including shopping trolleys to the east side adjoin A4123), people driving scrambler bikes and quad bikes across the site along with underage drinking, dog fouling amongst other issues. There was a fire on the site in 2022 that needed to be extinguished by the fire service. A closer presence of local homeowners and greater pedestrian access to the area would lead to heightened the natural surveillance of the wider site helping to reduce such incidents.

My client would work with the Council to ensure that all technical matters addressed and that the site will appropriately deliver biodiversity net gain. If the site is allocated for development it will be deliverable in the short term and deliver market and affordable housing in a highly sustainable location.

We would welcome the opportunity to discuss this site with you further. If you have any queries please do not hesitate to contact me.

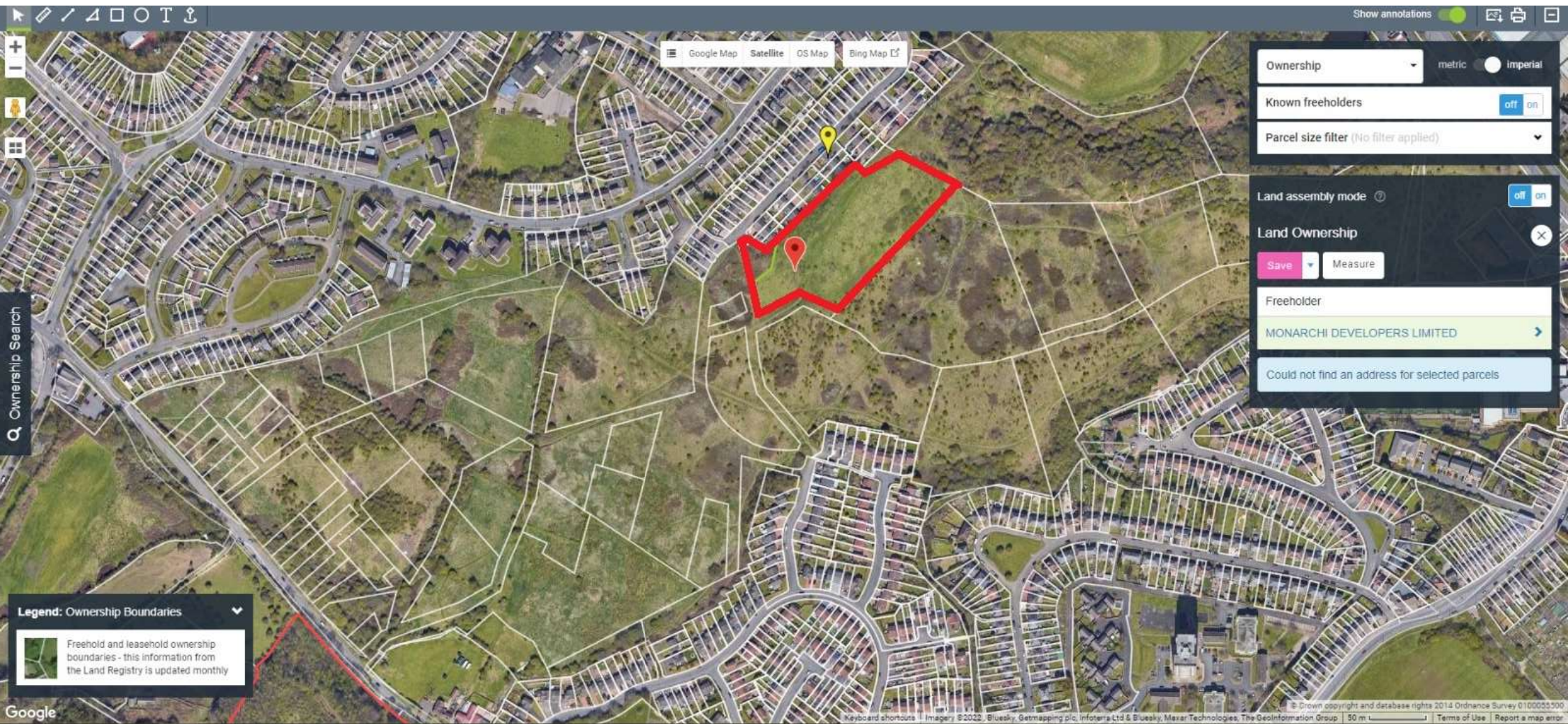
Yours faithfully

**Simon Hawley BA (Hons) MA MRTPI
Director**

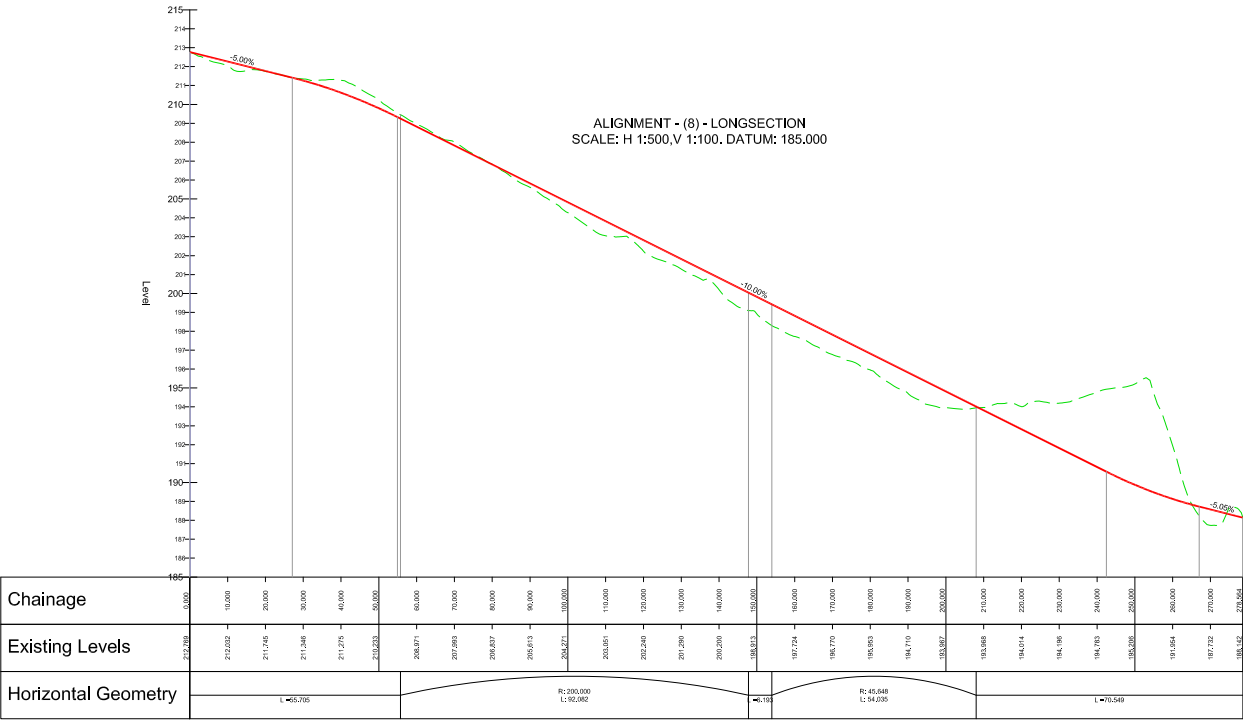
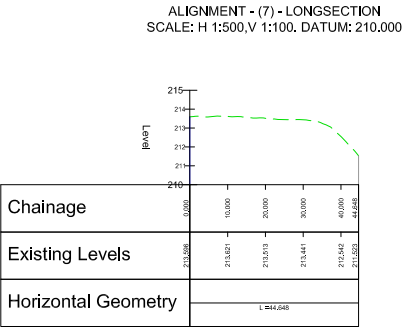
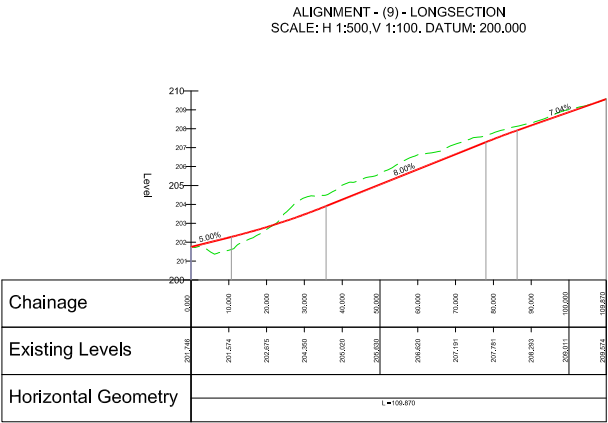
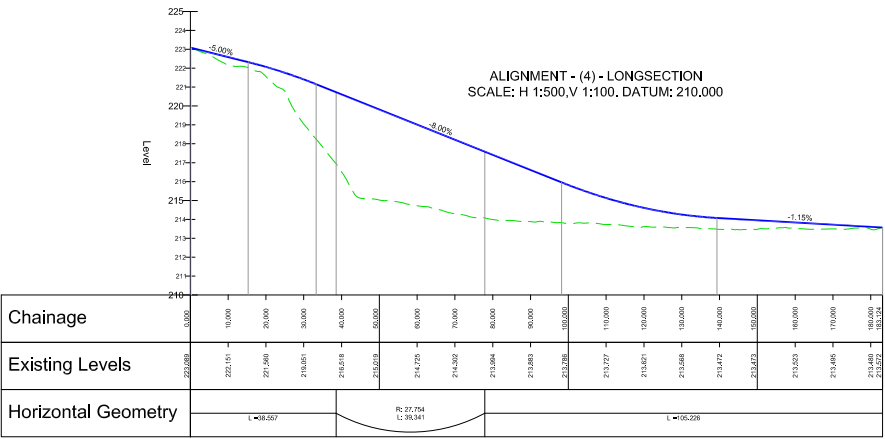
DIRECT DIAL: [REDACTED]

CC: Michael Griffin – Care Community Services Ltd

APPENDIX 1 : SITE LOCATION PLAN



APPENDIX 2 : SITE ROAD GRADIENT CHECKS



Based upon the ORDNANCE SURVEY MAPS with the permission of
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REV	DESCRIPTION	DRAWN	INITIALS	DATE



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JOB TITLE	Land at St Brades Close	CLIENT	CMCCS
DRAWING TITLE	Site Road Gradient Checks		
SCALE	1: 2000@A3	DRAWN BY	DN
DATE	Nov 23	DRAWING No	25443-02
REVISION			