

Our Ref: 10708 LA HW BCCS I&O and Call for Sites

Dudley Council
Council House
Priory Road
Dudley
DY1 1HL

Emailed Only: blackcountrycorestrategy@dudley.gov.uk

23rd August 2017

Dear Sir/Madam

Black Country Core Strategy Review: Land off Overend Road, Cradley Heath Business Park, Cradley Heath B64 7DW.

'Call for Sites' Submission and Response to the Issues and Options Consultation.

We write on behalf of our Client, Bamfords Trust Plc, who own the three adjacent parcels of land off Overend Road, Cradley Heath Business Park, Cradley Heath B64 7DW; as shown on the accompanying site plan, drawing number reference 10713-01.

This letter is submitted in response to:

- the current Black Country Core Strategy (BCCS) Review 'call for sites', together with completed Call for Sites Questionnaire and plan with the sites edged 'red'; and
- the BCCS Review Issues and Options consultation, together with completed Response Form and site plan with the sites edged 'red'.

Call for Sites Submission.

The site

1. Our Client's site comprises three adjacent parcels of land to the north west of Overend Road, Cradley Heath Business Park. Land identified as plot 1 on the accompanying site plan extends to approximately 0.19 ha; plot 2 extends to approximately 0.48 ha; and plot 3 extends to approximately 2.34 ha. Cumulatively, the site extends to approximately 3 hectares in area. The brownfield previously developed site lies on the southern edge of Cradley Heath Business Park with predominantly residential use to the south and north east.

2. Plot 1 comprises scrubland and part of a Cradley Heath Business Park estate road at the junction with Overend Road. This plot is bounded to the north east and south east by residential estates with employment uses to the north and south west. Plot 2 comprises an employment unit with open storage and car parking area. It is bounded on three sides by employment uses with Overend Road and residential uses lying beyond, to the south east. Plot 3 comprises employment units, associated car parking areas and internal estate access roads. It is bounded to the south by the River Stour and surrounding woodland with predominantly residential uses further south on the opposite side of Overend Road and Butchers Lane.
3. The site lies in a very sustainable location with: bus stops immediately adjacent to the site on Overend Road; a corner shop on the opposite side of Overend Road; Cradley Heath shopping centre approximately 1.6km to the north; Cradley Heath railway station approximately 1.8km to the north west; Timbertree Primary School approximately 0.8km to the north east; and Haden Vale Medical Practice approximately 0.2km to the north east. It is therefore within easy access of a range of public transport, retail and community facilities.
4. The site is not located within an area liable to the risk of flooding as shown on the Environment Agency Flood Risk Map. None of the dwellings within the vicinity are of any special architectural significance and the site does not lie within or near a Conservation Area. There are no trees of any note within the cumulative site area. The River Stour and surrounding woodland and open space, which lie immediately to the south of plot 3, is identified on the SAD Policies Map as a Site of Local Importance for Nature Conservation (SLINC). Development of our Client's sites for residential use would have no additional impact on the integrity of the SLINC.

Planning Policy Context

5. The National Planning Policy Framework (NPPF), states that purpose of the planning system is to contribute to the achievement of sustainable development and there are three dimensions to sustainable development: economic, social and environmental. It is a 'golden thread' running through the NPPF. Sustainable development, paragraph 7, includes planning to ensure sufficient land of the right type is available in the right places and at the right time to support growth and innovation; supporting communities, by providing the supply of housing required to meet the needs of present and future generations with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and contributing to protecting and enhancing the natural, built and historic environment, including helping to improve biodiversity.
6. The NPPF, paragraph 17, encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value, which this site in its entirety is not.
7. The site lies on the southern edge of Cradley Heath Business Park, currently identified

as Local Quality Employment Land in the adopted Site Allocations and Delivery (SAD) Development Plan Document, under adopted BCCS Policy EMP3. The site lies within BCCS Regeneration Corridor 13: Jewellery Line-Rowley Regis where the spatial strategy is for a housing corridor through the development of obsolete areas of industrial land and by making good use of the main-line rail links. A key feature of the strategy has been to create new residential communities to substantially increase the catchment and population base of areas, including Cradley Heath with improvements to other public transport links.

Emerging Planning Policies

8. The BCCS Review Issues and Options consultation has a number of options for accommodating the step increase in housing and employment land. Strategic Option 1B – continuing the role of the Growth Network, pages 38 -40, would involve the restructuring of existing Regeneration Corridors, with more existing employment land replaced with housing, and the remaining growth needs and replacement employment land being provided in the Green Belt.

Suitability for Residential Development

9. The site is a previously developed site in a very sustainable location which is prioritised for development in the NPPF. The site is close to a variety of social and community uses, most within easy walking distance including a health centre, corner shop and primary school. Public transport is easily accessible with bus stops immediately adjacent to the site. The protected River Stour SLINC area to the south of the site would provide a quality residential environment for future occupants. Redevelopment of this site for housing would not require significant new infrastructure given existing access and facilities.
10. The site is on the southern periphery of Cradley Heath Business Park adjacent to an area which is predominantly in residential use. Redevelopment of all or part of the site for dwellings would be compatible with adjacent uses to the south, southeast and north east. Redevelopment of the site for residential use would be in line with emerging BCCS Review Strategic Option B1.
11. The site would be capable of accommodating between 105 to 180 new dwellings at a density of 35 to 60 dwellings per hectare, as per BCCS Policy HOU2 'Housing Density and Accessibility'. This could comprise a mix of market and affordable houses, apartments/flats, bungalows and/or supported housing dependant on need, viability and market demand. The density could be increased or decreased as deemed necessary or appropriate. This large 3 hectare site would therefore make a valuable contribution to the increased housing requirement enabling a sustainable housing development.
12. The site is in the ownership of a single landowner who is willing to bring the site forward for residential development. There are no known legal or physical constraints which would prevent residential redevelopment of the site. Our Client's site is deliverable and

developable in the medium to longer-term ie. it is suitable, viable and achievable in accordance with NPPF paragraph 47, although it would not be available for development in the short-term. Existing employment occupiers within the site would need to be relocated to suitable alternative accommodation, potentially within new employment allocations to be identified within the emerging BCCS Review.

13. Our Client therefore commends the site to the Black Country Councils for assessment in the Strategic Housing and Employment Land Availability Assessment (SHELAA) and allocation in the BCCS Review for housing development in a last phase of the plan period.

Black Country Core Strategy Issues and Options Consultation

14. Our Client supports the Councils aim of meeting the projected additional need for employment and housing, including a proportion of the cross-boundary shortfall from Birmingham City. Our Client accepts that it will be necessary to identify the most suitable, sustainable sites for development currently lying within the Green Belt as well as making the most efficient use of brownfield previously developed land.
15. Our Client supports the principle of maximising the redevelopment potential of previously developed land in the most sustainable locations (page 34, paragraph 4.4 of the BCCS Review Issues and Options) and believes the Review should build upon the BCCS adopted objective of creating new residential communities to substantially increase the catchment and population base of Cradley Heath area with a comprehensive approach to development.
16. Question 11a: Our Client supports Strategic Option 1B – continuing the role of the Growth Network, which would involve the restructuring of existing Regeneration Corridors, with more existing employment land being redeveloped for housing, and the remaining housing growth needs and replacement employment land being provided in the Green Belt. This strategy would strengthen the vitality of existing town centres, such as Cradley Heath, with a greater concentration of dwellings in the most sustainable locations with the opportunity to build stronger and healthier communities, in line with national and local objectives.
17. In the first instance, our Client recommends release of employment areas within the Growth Corridors which are in the most sustainable locations on the periphery of residential areas, such as the southern section of Cradley Heath Business Park. Such sites would be most easily integrated into existing residential communities and be able to take advantage of existing infrastructure and public transport. Any release of employment land for housing should be on sites which lie outside the area liable to the risk of flooding.
18. Question 11b: Our Client commends land off Overend Road, Cradley Heath Business Park, Cradley Heath B64 7DW; as shown on the accompanying site plan, drawing number reference 10713-01 (plots 1, 2 and 3), for release from employment use and allocation for residential development. Full details of the suitability of this site for

residential development are set out above in the 'call for sites' submission.

19. In summary, our Client's site could be made available for residential development in the last phase of the plan period once appropriate alternative accommodation has been found for any remaining existing employment uses on the site. The site is in a very sustainable location, it is previously developed land, adjacent to a predominantly residential area to the south and north east, and has the protected River Stour SLINC to the south providing a quality residential environment for future occupants. The site is not in an area liable to flooding and there are no known physical or legal constraints which would prevent future redevelopment.

20. Our client's site is in single ownership and the landowner is keen to bring the site forward for residential redevelopment. Residential redevelopment of the site would make a significant contribution towards meeting the objectively assessed housing need for the Black Country by providing between approximately 105 and 180 dwellings at a density of 35 to 60 units per hectare.

We should be grateful if you would acknowledge receipt of this letter and confirm that the cumulative site will be included for assessment and inclusion in the SHELAA and comments submitted in response to the BCCS Review Issues and Options consultation will be taken into consideration when preparing the next, Preferred Options version, of the BCCS Review.

We look forward to hearing from you.

Yours faithfully,



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Encl. Site Plan 10713-01
Completed Call for Sites Questionnaire
Completed BCCS Review Issues and Options Response Form