

Mr Martin Dando
Black Country Core Strategy
Planning Services
Dudley Metropolitan Borough Council
The Council House
Priory Road
Dudley
DY1 1HF

Name

Address

Date 23.08.17

Dear Mr Dando

Review of the Black Country Core Strategy 2017
Objection to Housing and Industrial Development in the Green Belt

I/We oppose Green Belt development, but our experience, and intimate knowledge, relates primarily to all that Green Belt in close proximity to Halesowen and that separating Halesowen from Stourbridge. This includes countryside to the South of A456; that countryside at Lutley and around Wychbury Hill; the Green Belt that links to the countryside to the south via the line of the the Lapal Canal and includes The Leasowes and Coombeswood 'Wedge'. You do not ask for a detailed representation but I list some pertinent issues:

1. The Green Belt area that **I/we** have defined is of exceptional quality in terms of history; landscape quality; character; nature conservation; informal recreation and it is an important component in the visual envelope of the wider countryside, including the Clent Hills and beyond, within Worcestershire. The character and qualities have been shaped by nature, farming and earlier owners, including the Premonstratensian Cannons of Halesowen Abbey; Viscount Cobham of Hagley Hall; Lord Dudley of the Grange; William Shenstone; and the Canons of Wolverhampton. Much of the area has been identified by Dudley Council as a 'Landscape Heritage Area'. There are many recorded finds of archaeological significance on the lands of the former monastery, dating as far back as the Iron Age. Manor Farm, the site of Halesowen Abbey, which is a Scheduled Ancient Monument of National Importance, has the highest density of Public Rights of Way in Dudley Borough, reflecting its monastic importance, with paths from all directions leading to the Abbey. There are 'Green Lanes' of mediaeval origin. The area is extremely important with defendable Green Belt boundaries and the Lutley countryside, prevents major areas of Halesowen from coalescing with Stourbridge.
2. The '*Black Country Core Strategy*', adopted in February 2011, recognises sufficient land for housing and industry to the year 2026, without development in the Green Belt.
3. Under '*Sustainability*', the adopted Core Strategy states, '*Brownfield First [for development] - Ensuring that previously developed land, particularly where vacant, derelict or underused, is prioritised over greenfield sites*'. It is considered that there are many more opportunities for redevelopment of sites than the Councils appear to have recognised in coming to their 'Review' conclusions. For instance, in Halesowen Town alone, 'windfall' sites for future housing include the former Law Courts; the defunct Police Station and the former Council House. **It is premature to seek Green Belts sites at this juncture.**
4. Under '*Spatial Objectives*' the adopted Core Strategy promises an 'high quality environment' which "*will protect and enhance the unique biodiversity and geodiversity of the Black Country whilst valuing its local character.*" This is true of the contribution that the specific Green Belt locations listed above provide.

5. *Policy CSP2 of the approved Strategy of 2011, states it will provide, 'A strong Green Belt to promote urban renaissance within the urban area and provide easy access to the countryside for urban residents where the landscape, nature conservation and agricultural land will be protected and enhanced where practical and possible.'* Policy CSP2 then goes on to state that, *'Green Belt boundaries will be maintained and protected from inappropriate development'*. These principles should be upheld in the present circumstances.
6. Proposals to fundamentally modify the adopted Strategy of 2011 by building houses and industry in the Green Belt, would be contrary to environmental policy, *ENV2 - Historic Character and Local Distinctiveness*, and *ENV6 - Open Space, Sport and Recreation*.
7. The Urban Regeneration Strategy deployed in the approved plan of 2011, works and encourages the redevelopment of more difficult sites for housing and industry by preventing development in the Green Belt and on other greenfield sites. This is good for the environment in all aspects. Releasing Green Belt now will be a failure to direct development attention where it is necessary and desirable. Failure to continue to follow the regeneration strategy will result in unnecessary loss of countryside; will undermine public confidence in the Green Belt and will cause irreversible environmental damage.
8. The obvious corollary of releasing Green Belt now is that the process of Green Belt release will be perpetual for future development. It is not accepted that we need to start that process at this juncture. The 'Review' proposals undermine the principle of Green Belts and are a retrograde step.

Will you please record my objection and reply to acknowledge same receipt? Please keep me informed of progress and of future stages.

