



Our Ref: P1103ss  
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**BY EMAIL: [localplan@dudley.gov.uk](mailto:localplan@dudley.gov.uk)**

Dear Sir/Madam

**RE: Dudley Borough Call for Sites Consultation 2015**

Harris Lamb Planning Consultancy is instructed by the land owner to submit representations in relation to land in their ownership at Lapal Lane South, Halesowen. Please see the attached plan, which identifies the site.

The site covers an area of approximately 14.7 hectares and is located to the north east of Lapal Lane. It is also bound by Manor Way to the north and Carters Lane and the M5 to the east. The site is currently in agricultural use and is predominately grazing land. The body of the site is largely clear of any trees or other similar potential constraints, although the boundaries of the site are lined within a variety of trees and other types of mature landscaping.

The site is within Flood Zone 1 and it is not subject to any heritage or landscape designations. Other than its Green Belt designation, the Local Development Plan identifies no outright policy constraints to development on this site.

Developable

When allocating housing sites, in accordance with Paragraph 47 of the Framework consideration will need to be given to whether the sites are developable. Footnote 12 states that to be considered developable that:

*"...sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."*

Taking each of these points in turn:

### *Available*

My client owns the entire site. There are some rolling leases for parts of the site, but these would be terminated, subject to the required notice period, if an allocation was secured on this site. The site should, therefore, be considered as being available now and with an allocation in place would be progressed immediately.

### *Suitable*

The following points should be noted:

- The site is well related to both the Birmingham and the Black Country. It is therefore well placed to meet either Dudley's needs or to assist in addressing the identified overspill from Birmingham.
- The site has frontages onto the A456 Manor Way and Carters Lane. These potential access points would provide links directly into Halesowen to the north and Birmingham to the east.
- Carters Lane also provides pedestrian links and has a number of established bus services that run along it and past this site, thereby providing access to more sustainable means of travel to the car.
- Excellent access onto the strategic road network, with Junction 3 of the M5 next to the application site. In turn this also provides good access to Birmingham Airport and the rail network.
- The site is well screened due to vegetation, natural features and the topography of the surrounding land. This would keep any landscape impact to a minimum.
- The only development constraint, as identified through a review of the Proposals Map in Part 3 of the Development Strategy, is that a small part of the site is

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identified as a Site of Local Importance for Nature Conservation. It is envisaged that this would not only be retained through the development of this site, but also enhanced.

### *Viably be developed*

An initial review of the site has been undertaken. We are of the opinion that there are no constraints to development that could not be overcome through appropriate mitigation measures.

### Looking Forward

We are aware that Dudley and the other Black Country Authorities are currently conducting a review of both the housing market and the quality and quantity of employment land assessments as part of the early phases into the review of the Core Strategy. Furthermore, we have also been monitoring the work being undertaken by the Greater Birmingham and Solihull Local Enterprise Partnership and the Black Country Authorities in relation to the housing need within the nine authorities within it. It is understood that these documents will inform the review of the Black Country Core Strategy which is due to start next year.

The only one of these documents to be made publically available to date is the Peter Brett Associates, Strategic Housing Needs Study. The Stage 3 Report was published in August 2015 and was commissioned by a number of local authorities, including Dudley Council. This report identifies a significant shortfall in housing land supply across the Greater Birmingham Housing Market Area, which includes the Black Country Authorities. The report concludes that the "housing shortfall is an HMA-wide issue and requires all the local authorities to critically review their constraints in a unified and internally consistent way. This will include a review of the Green Belt. It identifies that greenfield sites will be relied upon to deliver most of the strategic housing demand and also concludes that in order to align housing with the location of jobs the HMA's housing supply should ideally be distributed as follows:

- 40% located within easy and sustainable commuting reach of Birmingham
- 30% within easy and sustainable commuting reach of the Black Country

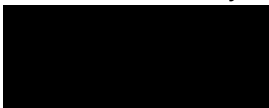
This site clearly achieves both of these and is well placed to assist in meeting what is identified as the minimum housing land shortfall and what in reality is likely to be higher than the figures quoted in the PBA Stage 3 Report.

The PBA report also identifies that of all the options they considered, urban extensions are most likely to be able to contribute new homes to meet the housing shortfall. This site currently falls just below the 500 to 5000 units identified for SUEs in the PBA report and is therefore not mentioned by name; however, this does not mean it could not make a meaningful contribution to the supply of land within the plan period. A second representation has also been submitted to this Call for Sites consultation, which identifies this site with the adjoining land parcels as areas of search for additional land for housing and/or employment uses in this location. Identifying some or all of this additional land with this site would clearly increase the scope for the amount of development that could be delivered in this location.

As identified above this site is available, suitable and deliverable and we consider this site should be seen as a prime opportunity to accommodate a proportion of the identified development needs. We would therefore welcome further discussions with the Council to further discuss the development potential of this site in the context of the emerging aspirations of Dudley MBC, the wider Black Country and the overspill from Birmingham City Council.

If you have any queries, or would like to discuss this matter further, please do not hesitate to contact me.

Yours sincerely



**Senior Planner**



Enc.

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