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8th September 2017

Dudley Council Council House Priory Road Dudley DY1 1HL

Sent via email to: blackcountrycorestrategy@dudley.gov.uk

Dear Sir/Madam

Call for Sites Consultation - Land at Pedmore Lane, Stourbridge

Pegasus Group is instructed on behalf of Richborough Estates to make submissions in relation to the current Black Country Core Strategy 'Call for Sites' exercise. Richborough Estates has secured an interest on a parcel of land referred to as Land at Pedmore Lane, Stourbridge. The site is located within the administrative area of Dudley Metropolitan Borough Council (MBC), one of the four authorities currently formulating a new Core Strategy to identify appropriate growth targets and a spatial strategy for distributing this growth across the Black Country.

This letter provides information about the site in terms of its context, suitability and deliverability. I attach with this letter a red line plan outlining the site location as well as a completed 'Call for Sites' form.

Background

The four Black Country Authorities (Dudley, Sandwell, Walsall and Wolverhampton) are inviting land owners, developers and other bodies to put forward sites to be considered for development as part of the Black Country Core Strategy Review.

Richborough Estates submit that Land at Pedmore Lane constitutes a sustainable and deliverable site, which will serve to contribute towards meeting housing needs arising within the Black Country.

It is submitted that the site has the capacity to deliver approximately 100 dwellings, subject to its release from the Green Belt.

Site Description

The site comprises 2 parcels of land to the south-east of Pedmore Lane, totalling approximately 4.6 hectares. The land is currently in agricultural use, associated with Pedmore Hall Farm and is currently accessed from Pedmore Lane to the west.

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The parcels of land are subdivided by existing tree/hedgerow boundaries associated with the agricultural use of the land. The site is identified as part Grade 3, part Grade 4, quality agricultural land on the Provisional ALC map, however these maps aren't suitable for establishing the quality of individual sites. Further survey work can be undertaken as necessary in due course.

The site is located within the West Midlands Green Belt. As such, development of the site would be subject to its release from the Green Belt. The site is located in Flood Zone 1, the area at least risk from flooding. The site is also relatively flat and not constrained topographically, though the landform rises beyond the eastern site boundary.

Planning Policy Context

The four Black Country authorities (Dudley MBC, Sandwell MBC, Walsall Council and City of Wolverhampton Council) collectively produced the existing Black Country Core Strategy, covering the period 2006 to 2026. The existing Core Strategy was adopted in 2011 and includes strategic policies for the Black Country area, whilst various Site Allocation Documents and Area Action Plans have been produced by the individual authorities.

The Black Country Authorities are in the process of undertaking a formal review of the Core Strategy, in light of the identified unmet housing need from within the Greater Birmingham Housing Market Area, of which it forms part. The Strategy is being reviewed to cover the period up to 2036 and is anticipated to be adopted in Autumn 2021. The Review is currently at Issues and Options Stage, which runs to 8th September 2017.

Land at Pedmore Lane falls within the administrative area of Dudley MBC and accordingly comprises part of the Black Country administrative area.

Sustainability

The site is sustainably located immediately adjacent to the major built up area of Stourbridge. In terms of services, Pedmore CofE Primary School is located approximately 300m to the west of the site, whilst Pedmore Technology College and Community School is located approximately 1.2km to the north of the site. A local shopping parade exists on Queensway, approximately 800m north-east of the site, which includes a Spar, an independent convenience store, a butcher, a green grocer and a barbershop. A number of other shopping opportunities existing in the centre of Stourbridge, located approximately 2.5km north of the site.

The site is therefore well sustainably located in terms of access to local facilities and services.

In terms of public transport, the number 276 bus service runs along Pedmore Lane (with stops immediately opposite the site) connecting Dudley with Wynall. These services begin at approximately 6:00 and end at 23:00 in both directions, running at 30 minute intervals throughout the day. Regarding rail services, the site is located approximately 1km away from Stourbridge Junction Station, with services running between

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Birmingham, Kidderminster, Solihull, Stratford-on-Avon and Dorridge at regular intervals.

The site therefore benefits from significant and genuine opportunities to utilise transport modes other than the private car.

Development Constraints

The site is located in Flood Zone 1, the area at least risk from flooding.

A scheduled monument (Wychbury Ring Hillfort) is located approximately 380m southeast of the site, whilst Hagley Hall registered park and garden, is located immediately beyond, some 600m from the site. Several listed buildings also exist in the vicinity of the site, including the Parish Church of St Peter (Grade II Listed), which is located approximately 200m to the west of the site. An Initial Heritage Appraisal has been prepared (and attached) to inform the site boundary and proposed yield to ensure development is set back to the areas of the lower slopes which have been identified as making a lesser contribution to significance of the hillfort.

None of the constraints identified to-date would preclude the development of the site, which would be designed to reflect these considerations.

Demonstrating Deliverability

Footnote 11 to Paragraph 47 of the NPPF states that in order to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The paragraphs below demonstrate how the site is suitable, available and achievable to accommodate residential development.

Availability:

Richborough Estates has an agreement with the landowner who have demonstrated, through the submission of this site through the Call for Sites consultation, that they are supportive of the development of the site to deliver much needed new homes.

As such, this call for sites submission confirms that there is nothing to prevent this site from being delivered immediately upon its removal from the Green Belt and the receipt of the necessary consents. The site can therefore be considered to be available.

Suitability:

The site benefits from a sustainable location immediately adjacent to the Black Country conurbation and is therefore well placed to meet the current and future development needs of the Black Country area.

As identified above, the site is well served by public transport and a number of local services and facilities are within a short distance from the site. The site would therefore

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be well placed to ensure that future residents would have sustainable access to a diverse range of services and facilities, representing an opportunity to deliver a cohesive, sustainable community that acts as a natural urban extension to Stourbridge and the wider Black Country.

Whilst the site is located in the Green Belt, its development would not result in encroachment towards Hagley beyond the established edge of the Stourbridge conurbation (as defined by Bromwich Lane to the south-east). Given the above it is respectfully suggested that the site be considered to be suitable for development.

Achievability:

The site is located within Flood Zone 1, the area at lowest risk from flooding. A scheduled monument, a registered park and garden and several listed buildings are located in the vicinity of the site. However, the presence of these features would be carefully considered when drawing up proposals for the site. The presence of these features does not preclude the development of these sites.

It is not known at this stage whether any of the trees on site are subject to a tree preservation order, however, the site is not located within a conservation area.

In terms of access, access would be required from Pedmore Lane, subject to detailed highways assessments.

The site is therefore not subject to any major physical constraints which would prevent development from being achieved. Further technical work will be undertaken as necessary to inform the plan-making process.

<u>Green Belt</u>

As noted above, the site is located within the Green Belt. It is understood that a Green Belt Review is being progressed at the Greater Birmingham Housing Market Area level in conjunction with the Black Country Core Strategy Review.

A brief assessment of the site against the five purposes of the Green Belt as set out within NPPF is included below.

Checking the Unrestricted Sprawl of Large Built-Up Areas

Whilst it can be argued that the development of the site would result in the sprawl of the built area of Dudley, the same can be said for any site released from the Green Belt for residential development. It remains that there is an overwhelming housing need within the GBHMA which can only be met through Green Belt release adjacent to the existing conurbation.

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Preventing Neighbouring Towns Merging into One Another

The existing edge of the Stourbridge conurbation runs beyond the southern boundary of the site (as defined by Bromwich Lane). As such, the development of the site would not diminish the existing separation distance between the Black Country conurbation and Hagley. A Green Belt buffer beyond the site would remain along Hagley Road to prevent merging of Hagley with the urban area.

Assisting in Safeguarding the Countryside from Encroachment

Similarly, whilst it can be argued that the development of the site would result in encroachment into the countryside, the same can be said for all sites located within the Green Belt. It remains that the surrounding land uses are predominantly residential and therefore the release of the site would not result in significant encroachment into the countryside.

Preserving the Setting and Special Character of Historic Towns

The site is not located in a conservation area and whilst there are several historic features within the vicinity of the site, they do not relate to any historic town. As such, the release of this site from the Green Belt will not impact upon the setting and special character of historic towns.

Assisting in Urban Regeneration by Encouraging the Recycling of Derelict and Other Urban Land

It is recognised through the Core Strategy Review that there is a deficiency of suitable brownfield sites to accommodate the prevailing housing need. As such, the release of this site from the Green Belt would not prejudice the recycling and redevelopment of urban land.

Conclusion

To conclude, Land at Pedmore Lane is a greenfield site located in a highly sustainable location adjacent to the existing settlement of Stourbridge, within Dudley Metroploitan Borough. This site has the potential to contribute towards meeting the prevailing housing need arising from within the Black Country and the wider Greater Birmingham Housing Market Area. It has been demonstrated that the site is available, suitable and deliverable, subject to its release from the Green Belt.

If you have any queries regarding the site or attached information, please do not hesitate to contact me. Additionally, if any further information is necessary or could be submitted to provide more detail of the proposals for this site or to assist in its assessment then again please do not hesitate to contact me.

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Yours sincerely



Enc.

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