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Your ref:

Our ref: SW/BH_OJL/BC-LP-002

17 August 2020

Dear Sir / Madam

BLACK COUNTRY LOCAL PLAN – CALL FOR SITES JULY 2020
SITE REFERENCE 339 - LAND WEST OF OUNTY JOHN LANE, STOURBRIDGE, WEST MIDLANDS, DY8 2RH

Further to the submission of Site ref 339 – land west of Ounty John Lane, Stourbridge, West Midlands, DY8 2RH, we provide further details of the site in response to the ‘Call for Sites July 2020’ and to provide further details in support of the site’s allocation and also to provide further information as per the ‘Final Call for Sites Submissions’ details as set out on the website.

As a landowner in the Dudley MBC area we are providing further details in respect of the site submitted for consideration as a land allocation for residential purposes within the emerging Black Country Local Plan. The site relates to land at Ounty John Lane, Stourbridge, DY8 2RH, with grid reference SO898816 (centred on E 389885, N 281688) and as shown on the attached site location plan.

A number of sites adjacent and in the near locality have also been proposed as residential development sites that are deeper incursions in to the Green Belt than this site. These proposals wrap around the subject site and leave it isolated for no discernible and justifiable planning reasons. Site proposal (site ref. 114) wraps this site on its eastern, southern and western boundaries. The subject site is immediately on the boundary of the suburban area and as a suburban extension should be the first, or part of the first, land area to be released and come forward for residential development (on a sequential basis of greenfield land releases in this locality).

The Black Country Urban Capacity Review December 2019 sets out that the “identified [housing] shortfall – “that is the amount of housing need which cannot be accommodated in the Black Country urban areas – remains significant, at around 26,920 homes.” Further there also remains a significant gap in employment land supply that cannot be met by land within the urban area. As such it concludes that “*Given the urban capacity evidence summarised above, it is reasonable to conclude that the exceptional circumstances necessary to trigger a Green Belt review in the Black Country, in order to meet housing and employment land needs*”.

With respect to revising and establishing new Green Belt boundaries, the NPPF at paragraph 136 provides that

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans

At paragraph 139. When defining Green Belt boundaries, plans should:

- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

In relation to these matters a Green Belt Review is being progressed at the Greater Birmingham Housing Market Area ('GB HMA) level in conjunction with the Black Country Core Strategy Review, which has identified an overwhelming housing need within the GB HMA, which can only realistically be met through Green Belt land releases, which could come in the form of new settlements or extensions at the edge of one or a number of urban areas.

In relation to the subject site, its land release alone would enable clearly defined boundaries to be established, even more readily than the existing residential boundary that abuts the site to the north. The subject site is bound to the north by existing residential development, to the east and south by roadways, which are also bound by well established field boundaries formed by established hedgerows, which is the same situation for the western boundary, as shown in the site plan and aerial photo extract below:



Fig.1 Extract from Promap and aerial photo (source Google Maps) of the site showing well established and definable boundaries

In consideration of the allocation of land for development, the NPPF provides (at paragraph 67) that *“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”*

Taking these key matters of availability, suitability and economic viability and assessing the site against these, the position is as follows:

Availability:

The landowner has confirmed that the land is immediately available – subject to planning – for development, and support the allocation of the site for residential development to help meet the significant shortfall and need to deliver much needed new homes.

Suitability:

The site is located at the edge of the suburban area and with respect to opportunities to release green belt land to the southern side of the Stourbridge conurbation is the most appropriate location, where an element of rounding off and infill of land is achieved, with readily recognisable and defensible new Green Belt boundaries able to be established, without penetrating too deeply into the Green Belt, prejudicing the purpose of the Green Belt in this locality or being open to significant further uncontrolled or indefensible expansion. As the images below show, with the subject site shown in red, the existing suburban area boundary identified in blue (on the aerial photo and coloured grey in the map extract) and a proposed small land release and new defensible boundary identified in orange, which follows existing fixed, defined field boundaries and roads in the case of the subject site, this would secure a logical rounding of the urban area settlement boundary without prejudicing any of the purposes of retaining land in the Green Belt.

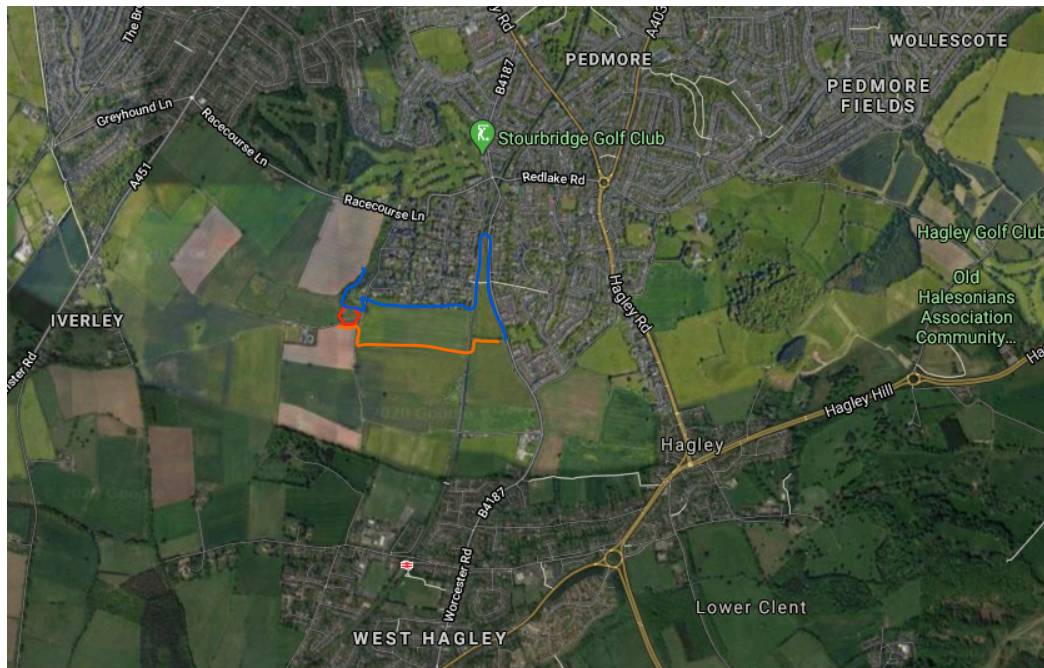


Fig.2 Aerial Photo Extract and Streetmap showing extent of built up boundary and proposed development extension inclusive of the subject site (red), along existing, well established, definable and defensible boundaries (orange)

It can clearly be seen that Racecourse Lane form a strong defensible boundary to the west, whilst Bromwich Lane extends the Stourbridge settlement considerable further to the south towards Hagley. Further east land is more sensitive with woodland areas where land release would have greater adverse impact on ecological matters of importance including Roundhill Wood / Wychbury Hill.

and without 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 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.

Viability

The site is greenfield and has no history of development of any contaminative uses (save any naturally occurring elements within the soils, as would be normal for such sites and as would be the situation for all the land in this general locality. The adjacent land to the east of Ounty John Lane (within the extension bordered orange as above) has been subject to agricultural use. Access is available to the site from Ounty John Lane and save for normal utilities provision and servicing of the site, as for any development, there are no constraints or impositions against development. As such the site is eminently viable to come forward for residential development

Achievability

The site is located within Flood Zone 1, the area at lowest risk from flooding. It is of Grade 3a/3b agricultural land classification – being good to moderate quality. There are no known ecological, environmental or historical asset designations which affect the site. There is access to the site which extends along the road from Ounty Joh Lane and utilities services can readily be provided.

The site is therefore not subject to any major physical, ecological, environmental or heritage constraints which would prevent development from being achieved.

Green Belt Purposes

Our assessment of the Green Belt at the edge of the settlement in this locality concludes that the subject site - and potentially immediately adjoining land, (as shown in images above) could be released without prejudicing the purposes of the Green Belt in this general location, as set out below.

- **Checking the Unrestricted Sprawl of Large Built-Up Areas**

Allocation of the subject site, with or without the immediately neighbouring land would provide a well-planned, balanced and sustainable small extension of the suburban area, rounding off the settlement boundary. As identified above, there are existing, strong defensible boundaries to the land which means that development would not result in the “unrestricted sprawl of a large built-up area”.

- **Preventing Neighbouring Towns Merging into One Another**

The existing southern edge of the Stourbridge conurbation extends beyond the southern boundary of the subject site, just to the east at Worcester Lane / Bromwich Lane, by 420 metres past the residential settlement boundary of Quarry Park Road. Development of the subject site and immediately adjoining land would not result in the merging of Stourbridge and Hagley, and would retain a at least a 630 metres to 1km separation distance between the settlements (measurements taken in straight line from various points along the boundary shown above). This means there would be retained a significant green gap and Green Belt buffer beyond the site and land proposed to be removed from the Green Belt.

- Assisting in Safeguarding the Countryside from Encroachment

Similarly to above, the allocation of the land proposed would retain a significant swathe of countryside and Green Belt beyond the respective settlement boundaries of Stourbridge and Hagley. With significant need to identify development land, and where Green Belt is required to be released, this scenario would apply. The subject is well defined with defensible boundaries and so would safeguard the retained countryside from encroachment in the future.

- Preserving the Setting and Special Character of Historic Towns

The site is not located in a conservation area and there are no listed buildings or other heritage assets within the site, or within the vicinity of the site. Development of the subject site, with or without the immediately neighbouring land would not adversely affect the special character of a historic town, or any heritage assets.

- 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 derelict, any brownfield land, or other regeneration schemes.

Conclusions

As the Black Country Urban Capacity Study 2019 has identified, at paragraph 4.9 “... due to the significant need for both housing and employment land across the Black Country over the new Black Country Plan period and the extent of already identified urban sites and limited opportunities for identifying other potential urban land it is not possible to meet all of these needs in the urban areas of the Black Country.

Further, at paragraph 4.10 it recognises that there needs to be a review of Green Belt for potential land releases to meet the urgent needs to provide for the significant shortfall in housing and employment land to serve the Black Country upto 2031. It states “Given the urban capacity evidence summarised above, it is reasonable to conclude that the exceptional circumstances necessary to trigger a Green Belt review in the Black Country, in order to meet housing and employment land needs, have been met.”

The subject site being land west of Ounty John Lane, Stourbridge, is an available and suitable site to provide new development to help meet this shortfall. It has been demonstrated above that the allocation of the site and some related land in the locality would not prejudice the purposes of land in this locality being designated as green belt. Land releases at the edge of existing settlements are a more sustainable solution than looking for new settlements wholly within the Green Belt. Land here can be allocated to round off the settlement boundary without prejudicing the Green Belt or countryside. There is no impediment to the land coming forward, in respect of significant ecological, environmental or heritage constraints. There are no contamination, services or viability issues for land here to come forward. The site is suitable, available, and achievable to meet housing needs and defined, defensible boundaries can be readily established for the longer term.

We look forward to receiving the Council’s confirmation of receipt of this site in due course; however, in the meantime if you require further information do not hesitate to contact us.

Yours sincerely

Steve Walters
Managing Director

Appendix A Black Country Plan Call For Sites

Site Details – Site 339 Land west of Ounty John Lane, Stourbridge, DY8 2RH

Updated details from those included to date and shown in blue below

What is your / your client's interest in this site? If you are an agent, please answer on behalf of your client only. Please select all that apply.

The client is the landowner of the site and a family member.

Does the other owner(s) support your proposals for the site?

Yes

Is there direct vehicle access to the site i.e. from a public road?

Yes

Site

Land at and west of Ounty John Lane

Site Address

Land at and west of Ounty John Lane, Stourbridge

Site Postcode

DY8 2RH

Site Area in Hectares

0.74

Site Area in Hectares of land suitable for development, if different to above

0.74 Ha

Please provide a brief summary of the current use(s) of this site or last known lawful use(s)

Vacant/unused grazing land

What use or mix of uses do you propose for this site? Please tick all that apply.

Residential

If housing or employment is proposed, please specify how many homes or how many hectares of employment land you think could be accommodated on the site.

15-25

What services are currently available at this site? Please tick all that apply.

Not Provided.

What constraints, if any, affect this site? Please provide details below for each constraint.

The site is within the Green Belt, and a Minerals Safeguarding Area (from Dudley Local plan proposals Map), but otherwise has no constraints. There are no ecological environmental or landscape policy designations affecting the site; not any heritage designations. The land is undeveloped so has no land contamination issues. The site lies within Flood Zone 1 and has no risk of river or surface water drainage flood risk issues.

Please provide supporting details for each constraint identified above.,

See the EA Flood Map for Planning attached

See the attached summary of land designations (and lack of any material ecological, environmental or heritage constraints) as sourced from the DEFRA MAGIC website.

Is the site agricultural land? If so, then what is the agricultural land classification? Please provide survey results, including mapping.

The Site is classified as Grade 3a Agricultural Land. See the Agricultural Land Classification Map attached

If there is a current use of the site that needs to be relocated what arrangements are required to achieve this relocation? e.g. manufacturer currently on the site needs to move to a building of xx square meters with good access to the motorway.

There is no existing use requiring relocation or reprovion elsewhere.

What new infrastructure do you think will be required to support the development of the site?

Some utilities services will need to be extended to the site boundary, but this is not a significant constraint

Please provide supporting details for the above.

Utilities services serve existing residential properties within 100 metres of the site

Are there any existing or historic planning permissions on the site? If yes, please include any details e.g. application reference number.

No

If yes, please provide details.

N/A.

Is the land available immediately for development (subject to obtaining any necessary planning permissions)?

Yes

If no, please explain why not and give an estimated timescale for when it will become available.

N/A.

Is there any current market interest in the site, other than from you / your client? Tick all that apply.

Not at this time.

Please provide further details of the market interest in this site.

N/A

Once started how many years do you think it would take to develop the site?

2

Do you think it is likely that there will be viability issues with developing the site that will require the use of external funding?

No, the site is greenfield and has no development constraints or any known abnormal development costs associated with development.

Have you previously contacted a Black Country or neighbouring authority about this site?

No

If yes, please provide brief details e.g. who you contacted and when and the current position of discussions.

Not Provided.

Please provide any additional comments you may have that are relevant to the site you are putting forward.

A number of sites adjacent and in the near locality have also been proposed as residential development sites that are further incursions in to the Green Belt and leave the subject site isolated. Site proposal (site ref. 114) wraps this site on its eastern, southern and western boundaries. The subject site is immediately on the boundary of the suburban area and as an urban extension should be first, or part of the first land to be released and come forward for residential development (on a sequential basis of greenfield land releases in its locality).

Add any documents supporting your submission

None