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Date: 20th August 2020

Dear Sirs,

Job Ref: RCA716a

RE: Black Country Call for Sites July 2020 – Land at Sandyfields Road, Sedgely

This representation is submitted by RCA Regeneration Ltd (the agent) on behalf of Seven Homes Ltd (the developer) in respect of land at Sandyfields Road, Sedgely (the site). In accordance with the preparation of the Black Country Plan, the Black Country Authorities are required to undertake a 'Call for Sites' exercise as a key component of the Strategic Housing and Economic Land Availability Assessment and the continuous process that feeds into the site assessment work to feed into the Local Plan Review.

Accompanying this representation, is a red line location plan which denotes the location of the site with a clearly marked boundary. The majority of the site lies within South Staffordshire Council with the potential access arrangements falling within Dudley Metropolitan Borough Council. A copy of the site location plan is shown at Figure 1 below.



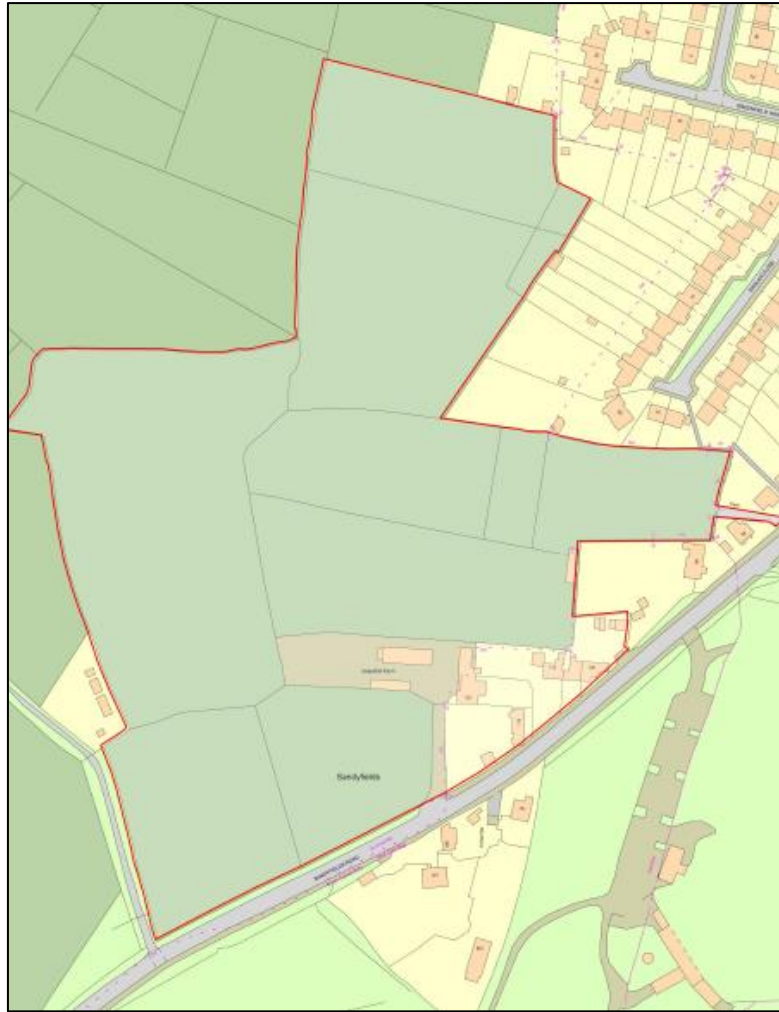


Figure 1 - Location Plan

This greenfield site extends to approximately 7 hectares and is situated to the south-west of Sedgeley and to the north-west of Lower Gornal. It is bounded by Sandyfields Road to the south, Raglan Close to the east along with residential development to the eastern boundary, and the former car showroom of S B Shakespeare to the south. The boundary to Sandyfields Road comprises of mature hedgerow and a small number of residential properties which are proposed to be subsumed into the proposed development. Within the site are a series of linear hedgerows which define the field boundaries into five compact pasture fields. These hedgerows include a number of mature trees that provide strong features within the site.

The site is located on the edge of Dudley's urban-rural fringe on the boundary of the two suburbs known as Sedgeley and Lower Gornal, which make up a gateway to the wider South Staffordshire countryside. The site is considered to be highly sustainable, with a significant level of shops, services and amenities



situated within a short walking distance of the site. Furthermore, ready access to public transport and bus stops are available outside 108 Sandyfields Road.

The site is washed over by Green Belt, but is well contained by mature trees and hedgerows on the boundaries of the site and is in an urban fringe location on the edge of Dudley. Existing development on Raglan Close and Greenfield View screens views of the site from Sedgeley. The site is at its most visible in close proximity to the site from Sandyfields Road to the south-west and is generally screened from long distance views by intervening vegetation.

In due course, we will be preparing a Vision Document which will be prepared to accompany the promotion of the site for residential development. The Vision Document will be submitted to South Staffordshire Council and the Black Country Authorities in response to their next round of consultation during the summer of 2021. Within the Vision Document will be an assessment of the Green Belt. At a very high level, the site has been assessed against the five purposes of the Green Belt as set out below:

- **To check the unrestricted sprawl of large built up areas** – The site is located in an urban fringe location on the edge of Dudley. It is well contained within the landscape being screened from long distance views by intervening vegetation, hedgerows and trees. The site has mature hedgerows to its boundaries to the south, east and north with the eastern boundary of the site screened by existing residential development around Raglan Close and Greenfield View. This existing development and linear residential development along Sandyfields Road give an urban fringe character to the site. The site (if removed from the Green Belt) therefore forms a logical extension to the urban area that does not create urban sprawl. An opportunity exists to improve the boundary to the Green Belt as existing residential development backing into the site does not have robust rear boundaries.
- **To prevent neighbouring towns merging into one another** – The Green Belt in this location does not have a strong function in preventing settlement coalescence. The nearest non-Green Belt settlement is to the north-west which is Upper Penn within Wolverhampton, and to the west which is Stirchley. To some extent the merger of surrounding villages has already occurred. The contained nature of this site and the retention of a significant green wedge between the site and Upper Penn and Stirchley and a lack of invisibility between the two will ensure that any perception of merging of settlements does not occur.
- **To assist in safeguarding the countryside from encroachment** – Most Green Belt sites will make a contribution to openness, but being made up of smaller land parcels, the site, as already explained, is well contained within the landscape by mature hedgerows and trees alongside existing



development. It is proposed to retain key landscape features of the site including significant internal hedgerows and field trees. The development will also work with the natural topography of the site. Opportunities also exist to provide mitigation planting and ecological enhancements in line with the site landscape character.

- **To preserve the setting and special character of historic towns** – The site is on the edge of Dudley but this fringe location is not within a Conservation Area, nor the setting of listed buildings or scheduled ancient monuments. The development of this site will not impact upon the special character of a historic town in that regard and does not contribute to it in this way.
- **To assist in the urban regeneration, by encouraging the recycling of derelict and other urban land** – Given the growth aspirations of the Black Country Authorities and the acknowledgement of the unmet need from the GBHMA, it is clear that Green Belt land must be released within the locality. The unmet need has been tested in various scenarios which look at increasing densities, releasing additional previously developed sites and sites in non Green Belt locations, and it is still subject to a significant shortfall.

Overall, we consider that this site performs fairly poorly when examined against the five purposes of the Green Belt as set out in the NPPF. All Green Belt sites will perform fairly well in terms of safeguarding the countryside because development will inevitably change the openness of the site. However, for a relatively modest loss of Green Belt land in this location, we consider that there are far more sensitive Green Belt sites in the City that contribute strongly to the other four purposes of the Green Belt.

The site is promoted for residential development of approximately 200 dwellings with an appropriate housing mix which will be informed by the Strategic Housing Market Assessment (SHMA). The proposals seek a residential use on the site of approximately 5.25 hectares; useable open space and a Locally Equipped Area of Play (LEAP).

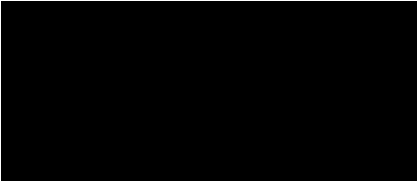
A number of supporting technical assessments are in the process of being prepared to inform the development of these proposals. A full summary of these will be available within the supporting Vision Document, once prepared, however, in summary consideration will be given to trees and arboriculture; flood risk and drainage; air quality; noise and transport.

Seven Homes Ltd (as the developer) have been working in conjunction with the landowners who are supportive of the promotion of the site for residential development and wish to see it released from the Green Belt and developed within the emerging Plan period.

I trust that the above and attached is sufficient and should you wish to discuss the contents of these representations, then please do not hesitate to contact us.



Yours sincerely



Victoria Lane MK11P1

Principal Planning Consultant

