



Labour Response to the Dudley Plan

Introduction

By Dudley Labour Group Leadership

This is the response of Dudley Labour group of councillors to the Dudley Plan.

Our response builds on the response we made to the Black Country Plan in October 2021.

Our response also makes observations on proposals for identification of land for housing and land for employment. The full response is included in appendices one and two.

Land for Housing

As per our response in October 2021, the Labour Group remains committed to

- Protecting green belt and precious green spaces and propose the development of brownfield sites only.
- Avoiding development of green spaces by identifying more brownfield sites, including remediating land where contaminated, better town planning and the renovation of existing properties, whether derelict or council owned.

In regard to the Dudley Plan proposals,

- We propose that all council land that is available for development should be prioritised for social or council housing for rent and that in future, any council land that is sold or any council land that becomes available should first be considered for social or council housing.



Cllr Pete Lowe

Labour Group Leader



Cllr Judy Foster

Labour Group Deputy Leader



Employment

- We are concerned about the lack of sufficient employment land identified, for our existing business sector to expand or to attract and build new business, in order to increase job opportunities for local people.
- We consider that Halesowen should be included in the Lye to Stourbridge regeneration corridor. The town is strategically placed near Birmingham, the M5 motorway (a short distance from M42 and M6) and has Rowley Regis rail station on it's border.
- We are not assured that the plan sufficiently exploits the potential of Dudley's culture, heritage and hospitality offer and so consider that more work is needed here.
- We consider more work is needed to identify how existing employment land is currently being used and the demand for it, and where demand is high, to identify derelict or other sites in these areas and remediate them to meet the demand.
- Finally, we consider there should be greater focus on the 15 local centres in the borough, not just the 3 town centres and the district centres, to provide services and employment opportunities close to home.

Overall

While Dudley Labour Group recognises the need for more homes for local people along with more employment opportunities, we remain concerned about the pressure on the local infrastructure and many of the consultation responses we received on this plan and the Black Country Plan, highlighted the additional pressure on the transport network, GP surgeries, schools and other services along with the lack of public transport.

There is little detail in the proposals about how these infrastructure issues will be resolved. At some point, there will be a need to look critically how the infrastructure can be modified sensitively and also funded and the Labour group will make representations as appropriate.

Cllr Pete Lowe and Cllr Judy Foster

22/12/2023

Appendix One

Land for Housing

It is important to understand that the Dudley Local Plan looks to allocate sites for Housing by establishing the principle of the use at this stage. The mix, type and tenure would be subject to the requirements at the time when a planning application is submitted. It is also worth noting that sites listed in the plan may not come forward for development until the mid-2040's in some cases.

In respect of housing mix, type and tenure therefore, the Labour group is not commenting on individual sites at this point.

However, Labour does want assurances that proper consideration is given to social need. Labour is of the view that where council land is sold / redeveloped (regardless of current use) first consideration should be given to meet the need for Housing for Social Rent. Exceptions should only be approved by Full Council. In this context other forms of 'affordable rent' should be considered an exception.

References in the plan relating to Policy DLP12 Delivering Affordable, Wheelchair Accessible and Self-Build / Custom-Build Housing, should breakdown the 60% allocation to indicate the split between social rent and affordable rent. This split should be periodically reviewed in line with current local housing need, assessed against relevant criteria applicable at the time. This is to ensure that the Council meets it's obligations to those who cannot afford so-called 'affordable rent' as in practice this is simply a rent discounted from the market rent and in many cases is far from genuinely affordable.

To put that in context, social rent is set through the National Rent Regime in England at around 50% of market rents.

Affordable rental properties are homes let at least 20% below local market rents. Intermediate rental properties are let at rates set between market rents and social rents. With rents in the private sector at their current levels, affordable rent is anything but genuinely affordable for a huge proportion of our population.

The Labour group also has concerns about the pressure that additional housing proposed will have on local services and therefore the following need to be addressed;

- How will DLP ensure these new developments have the infrastructure to ensure these new homes/ neighbourhoods are sustainable?
- How will the Council facilitate investment in local health care provision , like GPs and community health clinics?
- How will the Council plan for additional educational demands for both nursery and schools.
- How will tffe Council ensure the planning framework helps protect and provide green spaces for community use in the new neighbourhoods?
- How will the Council ensure the roads and transport links are able to cope with increased vehicle use and what representations does it intend to make to improve local transport provision to meet the needs of an expanding population?

Appendix Two

Land for Employment

The plan is welcomed by the Labour Group for its vision and purpose to deliver a brighter future for our communities and businesses. It clearly identifies opportunities, strengths as well as threats and weaknesses that do need to be addressed going forward. It is of great concern that in one key area, this being the need for the borough to have sufficient employment land for further growth of for key sectors in the borough, the Dudley Local Plan (DLP) has identified a significant shortfall of vital employment land that we feel will hold back our borough's economic development. The proposed mitigation measures within the DLP will not benefit our borough and could hinder the effectiveness of the vision to be truly realised.

A key economic conduit to the future prosperity of Dudley Borough is having employment land for existing businesses to expand to and new businesses wishing to relocate to Dudley borough. This is pivotal to economic prosperity and growth for Dudley borough.

The DLP has identified an exceptionally large shortfall of employment land needed by the borough for future growth. This is highlighted in detail in Part 1 of the DLP in section 9 – Employment Section. The DLP outlines in detail that Dudley needs 72 ha by 2041, however, in reality this becomes 98 ha as some of the designated employment land will inevitably be used for housing as outlined in the DLP.

Of the 72 ha , 23 ha would be needed for manufacturing sector and 49 ha for logistics/ storage sectors. These two sectors are the economic drivers for the Dudley's economy and having a shortfall in these key sectors could be damaging to the growth prospects of these sectors and those employed in them.

Thus, it is of great concern that at present only 25 ha of land is available. As part of Duty of Cooperate obligations under the Black Country Functional Economic Market Area (FEMA) arrangements, DMBC will work with other LAs to ensure the employment land needs can be met by neighbouring councils. Work will be ongoing with other neighbouring councils on how they can help DMBC address a shortfall of 33 ha (59 ha when the loss of employment land is added)

The DLP outlines key policies to support economic growth relating employment land areas , these are:

Policy DLP18 - Economic growth and job creation

Policy DLP19 - Strategic Employment Areas

Policy DLP20^F - Local Employment Areas

Policy DLP 21 – Other Employment Areas

Policy DLP 22 – Balancing Employment Land, Housing ,and Protecting the Viability and Integrity of Existing Industrial and Business uses.

Appendix Two

The concern is that the FEMA arrangements present a methodology for DMBC to help meet its obligations to deliver employment land outputs, however these will be elsewhere in neighbouring authorities and not within the borough's boundary.

This will greater hinder DMBC vision to be a place for business to grow and to be attract new and expanding businesses who wish to make Dudley their businesses new location.

The knock-on effect could be.

Existing Dudley businesses cannot find new larger premises to grow their businesses and employ more local people in the borough.

Businesses may be forced to relocate outside the borough, and this may mean that local people currently working for these businesses will not be relocating with their employer.

Businesses become uncompetitive as they cannot find larger sites within which to operate and therefore, they decide to close, resulting in job losses.

Growth sector businesses looking for new geographical locations to expand will not move to Dudley as it has no attractive new employment land for inward investors.

Companies moving out will cause a 'brain drain' of skills and personnel.

Knock on effect of reduced level of business rates payable.

It is imperative then that the emerging Regeneration Strategy and the Implementation Plan clearly outline the measures needed to help bring to the market more employment land and close the gap in shortfall of land in the Borough. This is pivotal in helping to create the environment for local businesses to grow and thrive in the Borough rather than having to relocate outside the Borough. Omission of Halesowen from the Revised Regeneration Corridors Carried over from the Black Country Core Strategy

Regeneration Corridor 13- Jewellery Line- Rowley Regis – Stourbridge

In the previous Black Country Plan, the Regeneration Corridor 13 - Jewellery Line- Rowley Regis to Stourbridge Junction was an integral part of the regeneration corridor that ran through the Sandwell and Dudley area. The rail line, in parts, forms the boundary of Halesowen. The rail line, although termed Rowley Regis, also straddles the border of areas of North Halesowen and links the town via trains to London and beyond.

As Rowley Regis Station is literally yards from the Halesowen Town boundary, the Regeneration Corridor and the strategic rail has been instrumental in helping secure investment of two hundred plus new homes and business units in this northern part of Halesowen, off Cakemore Road and Nimmings Road.

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Regeneration Corridor 14 – Coombswood to Halesowen

This corridor in the BCCS and the Dudley Borough Strategy has also been omitted in the DLP. Halesowen plays a key economic role as it is home to one of only three strategic high quality employment areas in the boroughs economic map. This large of area includes manufacturing businesses and is sandwiched between Coombs Rd and Mucklow Hill.

Halesowen is also placed less than two miles from both junctions 2 and 3 of M5 and shares a border with the City of Birmingham, which acts as a gateway for visitors from the City to our Borough.

Yet the revised Regeneration Corridor exercise undertaken by DMBC officers totally excludes the strategic location of Halesowen as an integral part of the revised Regeneration Corridor that was in existence as it was when it was in the Black Country Core Strategy Plan.

This oversight needs to be addressed as Halesowen Town should be benefiting regeneration funding streams to further unlock its potential as a key economic town of the Borough.

Other Positive Attributes for it's Inclusion in the Corridor

The town has just secured Levelling Up Funding (LUF). The funding will help to unlock the town centre to help attract investment and visitors. The LUF will help open up the centre of the Town, enhance its retail and leisure offer and establish a new college facility in the centre.

The much talked about Halesowen Gateway Project will also help complement the regeneration plans by showcasing the attractions of historical English Heritage Grade 1 Leasows Park, The Canal Basin , Coombs wood Green Space and Halesowen Golf Club In addition, there is also a DMBC officer working group considering how to finally address the neglect of Shell Corner Local Centre that has had two commissioned reports completed by DMBC highlighting the need to enhance the centre. However, these two commissioned studies are yet to report back.

The centre is along proposed regeneration corridor from the train station to Mucklow Hill. Mucklow Hill is seen as a key gateway to the industrial heart of Halesowen and the town centre. A number of low value sites along Nimmings Rd could be compulsory purchased and brought forward for regeneration to help unlock large area of council land that could be to put to better use as a residential village for senior citizens.

Thus, the omission of Halesowen from the existing Regeneration Corridor needs to be corrected and addressed so it continues to be an integral part of this strategic regeneration corridor and help lever in investment and funding to strengthen its retail, economic and leisure destination roles as a Gateway to the Dudley Borough from J 2 and 3 of M5 and the City of Birmingham

Appendix Two

DLP Aims - Protecting and Diversifying the Boroughs Cultural and Tourism Assets

Dudley has an abundance of heritage and culture to offer as a visitor attraction. However, we are not assured that this offer is being exploited to its full potential. There is a need to create the right environment and to ensure there is a joined up approach by DMBC, its key attractions and the hospitality sector, each working closely with public agencies like WMCA and the Heart of England Tourist Board to better coordinate a marketing campaign to attract further visitors to help deliver economic benefits for Dudley .

It is essential the key findings of the recent LGA Peer Review as outlined on page 13 , third paragraph ‘ the tourism and visitor offer are important, and the Council could be clearer on how this could fit with the regeneration proposals . The development of a strategic marketing approach for the visitor economy would be useful ‘ . This theme is captured as one of the key recommendations from the Peer Review , **Recommendation 19** : Develop a place marketing approach for the visitor and tourism economy .

This has clear linkages to the Regeneration Strategy and directly to DLP aims ‘ Protecting and diversifying the boroughs cultural and tourism assets.’ Under Policy DLP5

Audit of Existing Employment land use in the Borough

Labour considers that one of the key strands of work that needs to be done from the emerging Regeneration Strategy is to undertake a detailed audit of the existing employment land use in the borough. This should;

- Clearly map out occupancy rates
- Identify where is there low occupancy.
- Identify the barriers to full occupancy and how can they be addressed to ensure occupancy is maximised. For example, is it stock condition, or other factors like the environment, safety concerns, access to the business locations, public transport issues etc?

The audit should then translate into specific actions to collaborate with owners and business estates to help maximise usage of existing employment to help close the gap. It could identify funding opportunities to help lever in owners who may not be interested in funding improvements to their land / properties.

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Derelict Sites Programme

This DMBC Programme should also be focused to identify land sites that can be acquired and then made into employment land, if their locations are in employment areas, to help increase land for employment.

DMBC could prioritise action on derelict sites in high demand areas to help deliver much needed land for employment use. This could include collaboration with owners or use CPO powers to acquire land and use grant funding to prep sites for employment use .

Centres and Town Centre - Strategic , Regional and Local Centres

The DLP recognises the significant economic role centres play in the fabric of the borough, whether they be strategic centres like Brierley Hill, Town centres like Dudley, Stourbridge and Halesowen , district centres like Lye, Kingswinford and Sedgley or one of the 15 Local Centres , these being : Amblecote, Cradley/ Windmill Hill, Gornal Wood, Hawne, Netherton, Oldwinsford, Pensnett, Quarry Bank, Roseville, Shell Corner, The Stag, Upper Gornal, Wall Heath, Wollaston, Wordsley

The DLP outlines a range of policies that will help to ensure the centres continue to trade successfully in an ever-changing retail environment. This will be done by implementing policies that Council will adopt from both regional and national policy frameworks to support investment in the centres to ensure they remain fit for purpose. Specific Policies outlined in the DLP include the following :

- DLP24 – Dudley Borough Centres
- DLP25 – District and Local Centres and Local Services
- DLP26 – Small Scale Local Facilities
- DLP27 – Edge of Town Centre and Out of Centre Development
- DLP 28 – Residential Development in Centres
- DLP29 Hot Food Takeaways
- DLP30 – Shop Front Security

It is essential that DMBC continues to secure funding and investment in our centres in line with these policies so they can adapt, evolve, and continue to thrive. As well as delivering economic benefits, the centres are importantly a focal destination for residents to visit for leisure and social interaction as community hearts of the surrounding towns and neighbourhoods.

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Town Centre Regeneration Plans

The DLP outlines in detail policies and regeneration opportunities for each of the large centres of Brierley Hill, Stourbridge, Dudley, and Halesowen. It is essential these plans are taken forward with full consultation with all stakeholders to ensure an inclusive buy in and ownership of the emerging plans.

This will be critical in securing the funding in help deliver lasting change to our centres driven by the community and business that they make them.

Dudley's 15 Local Centres

There is concern that little is noted in the DLP of the ongoing need to ensure the 15 local centres that provide an economic and community role in our neighbourhoods are not overlooked. These centres warrant more than the annual vitality health checks to assess their conditions. The local centres are very much the beating hearts of their wards and the council need to ensure they remain fit for purpose, providing a valuable role as places for local shopping and meeting up.

The council needs to ensure that these local centres also have action plans . This is pivotal so independent shops continue to thrive in our local centres as shopping habits change . The need to ensure the small centres can adapt and evolve is key to delivering sustainable communities.

The vibrancy of small Local centres is always a good barometer if the local area is thriving or in decline , thus annual vitality health checks should be used to determine investment and interventions to support centres and not just used as a annual exercise.