

# Representations to the Dudley Local Plan Regulation 18 Consultation

On behalf of The Feoffees of Old Swinford Hospital in  
respect to the Land at Racecourse Land and the Land to  
the West of Worcester Lane

December 2023

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# 1. Introduction

- 1.1 Turley is instructed by the Feoffees of Old Swinford Hospital ('the Foundation') in response to the Dudley Local Plan ('DLP') Regulation 18 consultation. The Foundation welcomes the opportunity to make representation on the draft version of the Local Plan.
- 1.2 The Feoffees of Old Swinford Hospital are the trustees of a charitable foundation which supports Old Swinford Hospital, a maintained voluntary aided school, situated in the centre of Stourbridge. The school was founded by Thomas Foley in 1667 as a place where boys could develop the skills and attributes required to go out into the wider world and make a difference. Upon Thomas Foley's death, the school was left to a group of trustees, his sons among them, known as Feoffees. This family tradition has survived the centuries and the Feoffees, including several direct descendants of the Founder, retain an active involvement in the School of the Foundation today as Feoffees and Governors. The School is now fully co-educational and welcomes both boys and girls, both as boarders and as day pupils.

## The Sites

- 1.3 The Foundation is actively promoting two sites within Dudley Borough:
- Land at Racecourse Lane, Stourbridge ('Racecourse Lane')
  - Land to the West of Worcester Lane, Stourbridge ('Worcester Lane')
- 1.4 Both sites were submitted via the Call for Sites exercise in March 2023<sup>1</sup>. The Foundation owns the land at Racecourse Lane and Worcester Lane and plans to develop each site separately for new homes whilst retaining and enhancing recreational and green spaces. The income generated from the development will be reinvested entirely to support the Foundation's charitable object, Old Swinford Hospital.

## Racecourse Lane

- 1.5 Racecourse Lane comprises the Stourbridge Golf Course to the north of Racecourse Lane, and an area of arable farmland to the south. Racecourse Lane is surrounded by existing residential development to the west, north, east and south-east.
- 1.6 Racecourse Lane is in an area of High Historic Landscape Value. The existing golf course is covered by two non-statutory designated sites for nature conservation. The western half of the golf course is designated as a Site of Importance for Nature Conservation ('SINC'), referred to as Pedmore Common. The eastern half is designated as a Site of Local Importance for Nature Conservation ('SLINC'), referred to as 'Stourbridge Golf Course'. Additionally, two further SINCS, which do not form part of any proposed

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<sup>1</sup> Call for site reference numbers:

DUD2023-048 – Land at Racecourse Lane

DUD2023-051 – Land at Worcester Lane

development site, are located near to Racecourse Lane, with Ounty John Wood adjacent to the eastern boundary of the arable farmland, and Norton Covert to the west of the arable farmland.

- 1.7 There is a Public Right of Way ('PRoW') which extends north from Racecourse Lane, passing through Stourbridge Golf Course, connecting to Melrose Avenue.

### **The Proposal**

- 1.8 The vision for Racecourse Lane is to create a new neighbourhood of up to 650-700 new homes on the edge of Stourbridge to be of the highest standard, featuring bespoke, high-quality homes within an attractive landscape. The new neighbourhood will also feature the provision of on-site community infrastructure, including a primary school and nursery, and health centre/community hub.

- 1.9 The new neighbourhood will provide a natural urban extension to Stourbridge which reinforces the existing settlement pattern. The proposals for Racecourse Lane are landscape and biodiversity creation led, therefore key features of these proposals are new areas of woodland and creating opportunities for recreation and biodiversity.

- 1.10 As demonstrated by the enclosed concept masterplan in **Appendix 1**, the proposals for Racecourse Lane include:

- The delivery of approximately 650-700 new homes of a mixture of sizes, densities and tenures;
- Provision of education and childcare facilities, including a potential primary school and nursery to the west of the site;
- Provision of a new health centre;
- Re-provision of a golf course circa 43ha, which will remain in the Green Belt and provide a new defensible boundary;
- Preservation and enhancement of existing woodland, as well as the creation of additional woodland to protect and provide opportunities for recreation and biodiversity whilst providing a natural buffer to the north, whilst also delivering a newly accessible woodland, complementing the wider areas of public open space to be provided elsewhere within the development;
- Provision of significant public open space which will incorporate opportunities for locally equipped areas of play for new residents and surrounding neighbourhoods to enjoy;
- Provision of green infrastructure running through the development, incorporating tree planting, drainage features and pedestrian and cycle links;
- Re-providing the value of the existing Site of Important Nature Conservation (SINC) and, overall, delivering a measurable biodiversity net gain (as demonstrated by the Biodiversity Technical Note);

- Potential to deliver highways improvements that would make a positive contribution to the surrounding neighbourhood on the grounds of safety, reduction of carbon emissions and the environment; and
- In total circa 30% of the existing golf course site will become green infrastructure and open space as part of the proposals.

### **Achievability**

- 1.11 Overall, Racecourse Lane has strong potential to be brought forward for housing over the medium term. The Foundation are the sole owners of the land therefore a planning application could be submitted immediately following adoption of the Dudley Local Plan. The proposals for Racecourse Lane are supported by Ecology and Transport technical notes enclosed in **Appendices 2-3**.
- 1.12 There are no technical constraints to development. The Historic England online register indicates that there are no listed buildings or scheduled ancient monuments within the site. The on-site constraints which have been identified such as the ProW, Pedmore Common SINC, Stourbridge Golf Course SLINC, and Ounty Johns Wood SINC are all set to be significantly enhanced by the proposals.

### **Worcester Lane**

- 1.13 Worcester Lane comprises relatively flat agricultural land with a Public Right of Way (PRoW) (ref: STR0140) running through the site from northeast to southwest. Worcester Lane is bound by existing homes to the east, a railway line to the west, and further development to the north, beyond the adjacent land which forms part of the same proposed allocation. Whilst there are no formal vehicle access points into the site at present, the site would have its own vehicular access off Worcester Lane, as well as an access point to the PRoW. There are existing tree and hedgerows within and around the site. The retention and enhancement of these features has been investigated as part of the preparation for the illustrative layout for Worcester Lane.
- 1.14 Worcester Lane is located within the Green Belt however it is not constrained by any environmental designations such as Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas or Ramsar sites. The Aqueduct Railway Cutting SLINC lies 10m south-west of the development which can be accessed from the public footpath running through the site. There are no heritage assets located within or close by Worcester Lane.

### **The Proposal**

- 1.15 The proposed development at Worcester Lane could deliver circa 120 new homes of a mixture of sizes, densities and tenures, including affordable housing in a sustainable location that will round off the existing settlement edge as shown in the enclosed Illustrative Layout in **Appendix 4**. The proposals for Worcester Lane are supported by a number of technical notes in **Appendices 5-10**.
- 1.16 The proposals include a robust landscape buffer (circa 20m deep) at the southern extent, creating a new defensible Green Belt boundary as well as supporting wildlife and biodiversity enhancements. The proposals reflect the appearance and character of the surrounding area and maximise connectivity, including re-providing the PRoW

which currently crosses the site. There is also the opportunity to potentially provide additional car parking on site, relieving the pressure on nearby streets as they can be used for parking by people wishing to walk in the wider area.

- 1.17 In addition to above, two areas of play and extensive public open space are proposed, including a new recreational route for new and existing residents to enjoy. The existing vegetation along Worcester Lane will be maintained along with additional planning of a mixture of trees.
- 1.18 A buffer is also to be provided between homes and the railway corridor to the west to ensure any noise from the railway line is mitigated.
- 1.19 Worcester Lane previously formed part of a wider proposed allocation in the now abandoned Draft Black Country Plan 2039 (site ref: DUH209). We will continue to engage with the landowners to the north to ensure a coordinated and comprehensive development is delivered across both sites, including exploring links between the two.

#### **Achievability**

- 1.20 Worcester Lane is unconstrained. There are no listed buildings or scheduled ancient monuments within or nearby, and there is no ecological designation, as demonstrated by the site assessment prepared by the Council as part of the now abandoned Black Country Plan (site ref: DUH209). Worcester Lane benefits from being in an accessible and sustainable location. No significant infrastructure is required to support the proposed new homes. Worcester Lane can be delivered early on in any plan period and so can assist the Council in maintaining a strong housing land supply following adoption of the Dudley Local Plan.

#### **Approach to the Local Plan**

- 1.21 The Foundation supports the plans focus on addressing climate change, sustainable development, and protecting and enhancing the natural and historic environment.
- 1.22 However, the Foundation has concerns regarding the plan's proposed housing supply and spatial strategy for the Dudley Metropolitan Borough ('the Borough') particularly given that it solely relies on brownfield sites to meet housing needs.
- 1.23 These representations are structured as follows:
  - **Section 2:** Sets out the Foundation's response to the draft DLP Part 1 consultation;
  - **Section 3:** Provides a conclusion to these representations.

## 2. Representations to the Draft Local Plan Regulation 18 Consultation Document Part 1

- 2.1 This section provides The Foundation's responses to the relevant policies contained with the DLP Part 1 Spatial Strategy and Policies consultation document.
- 2.2 The Foundation supports the strategic objectives and priorities as set out in Table 4.1 in the DLP which will support the vision for Dudley by 2041. In particular, the Foundation supports *Strategic Priority 6* and the need to provide new and affordable homes in a range of sizes, types and tenures to meet the Borough's needs.
- 2.3 The Foundation however raises concerns with *Strategic Priority 3* which seeks to protect the Green Belt by focusing delivery on previously developed land in the urban area. If the Borough is to, as a minimum, meet its objectively assessed housing needs in order for it to be positively prepared, as required by National Planning Policy Framework ('NPPF') (December 2023) paragraph 35, then the plan must propose a balanced supply of housing and essentially 'turn on all the taps of supply', which includes reviewing its Green Belt boundaries.

### **Policy DLP1 Development Strategy**

- 2.4 The Foundation has no concerns with the principle of a policy that will support sustainable growth that meets the needs of local communities. As noted in the 2022-2023 Strategic Housing Land Availability Assessment ('SHLAA'), the Local Housing Need Standard Method is 11,790 homes between 2023-2041 or 11,954 allowing for 5% (164) homes buffer for the first five years. Policy DLP1 fails to meet this need, identifying a supply of 10,876 net new homes for the plan period, amounting to a shortfall of 914 – 1,078 new homes.
- 2.5 Firstly, the policy should be clear that 10,876 new homes is the proposed supply only and that the full need for the Borough is currently at least 11,790 homes.
- 2.6 Secondly, the Borough should be reviewing its Green Belt boundaries given the availability of land beyond its urban area, and not exacerbating the already significant housing shortfall arising from the wider Black Country authorities. Based on their own assumptions the Black Country Authorities ('BCAs') (including Dudley) concluded there was an unmet need of 36,819 homes up to 2039 as part of the Black Country Urban Capacity Review Update (May 2021). That assumed that Dudley would contribute to reducing the shortfall, not add to it.
- 2.7 Beyond the Black Country, Dudley is one of fourteen local authorities that make up the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') which also includes Birmingham. Birmingham, the largest local authority within the GBBHMA, has now commenced a review of its local plan. The Issues and Options version of the plan published in 2022 indicates there is likely to be a substantial shortfall from the city of circa 78,000 homes up to 2042.
- 2.8 As pointed out in Dudley's response to the Sandwell Local Plan consultation (dated 16<sup>th</sup> March 2023), it is important for authorities to meet its own housing needs within its

own boundaries as far as possible to reduce the wider housing market area shortfall. Indeed, local policies should identify and plan for a sufficient supply of housing as per NPPF paragraph 69.

- 2.9 Table 5.1 in the DLP notes that a total of 1,078 new homes are to be added to the wider GBBCHMA shortfall and ‘exported’ elsewhere. The Draft Duty to Cooperate (‘DtC’) Statement (October 2023) that forms part of the evidence base notes that at the time of preparing the Draft DLP potential contributions for housing from the BCAs and GBBHMA are as follows:

**Table 2.1: Housing Contributions**

Local Authority	Contribution	Potential Towards Dudley
Shropshire Council	1,500 to BCAs	431 (subject to formal agreement/ Statement of Common Ground between BCAs)
Lichfield District	2,000 to BCAs	68 Homes
South Staffordshire District Council	4,000 to GBBHMA	TBD
Telford & Wrekin Council	1,640 to BCAs	TBD
Cannock Chase DC	500 to GBBHMA	TBD

- 2.10 At a meeting of its Full Council on 17<sup>th</sup> October 2023, Lichfield District Council made the decision to withdraw its Local Plan Review and start again with preparing a plan, therefore its contribution to Borough’s unmet need should be discounted. As such, Table 2.1 indicates that only 431 homes from neighbouring authorities have been potentially secured, with the remainder still subject to negotiation and agreement. Notwithstanding this limited weight can be given to a number of the homes included in the table.
- 2.11 Furthermore, it is unclear what progress is being made on the other plans referred to, including South Staffordshire, Telford & Wrekin, and Cannock Chase. We understand there will be a further Regulation 19 consultation on South Staffordshire’s Local Plan Review in early 2024, this will likely indicate the contribution it can make to the wider GBBCHMA shortfall.
- 2.12 In light of the above, for the DLP to be considered positively prepared the overall development strategy should be revisited and the need to review Green Belt boundaries to ensure that the Borough is able to meet its own needs. Both the Racecourse Lane and Worcester Lane sites together amount to circa 820 new dwellings, which equates to 76% of the unmet need that is to be exported to neighbouring authorities.
- 2.13 The above demonstrates that there is no evidence for lowering the supply of housing for the plan period total. Given the unmet need within the Borough and wider housing



market area, exceptional circumstances have been clearly demonstrated to alter Green Belt boundaries through the draft plan, in accordance with NPPF paragraph 145.

#### **Policy DLP3 Areas outside the Growth Network**

- 2.14 The Foundation supports Policy DLP3 in principle but has concerns in respect of the emphasis on development outside the growth network on brownfield land only. NPPF paragraph 109 notes that new development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This paragraph does not limit new development to brownfield sites only.
- 2.15 The DLP Site Assessment Report (October 2023), confirms that in accordance with the preferred spatial strategy of the DLP, only sites in the urban area of the Borough have been assessed for potential development, with a focus on brownfield land. This approach excludes potential development opportunities in areas outside the urban boundary, including those within the Green Belt. This methodology falls short of providing a comprehensive assessment of all available land within the Borough.
- 2.16 Whilst Green Belt is a designation that should be balanced as part of the site selection process, it should however not be treated as a 'gateway constraint' and essentially a determinative factor as to whether a site is suitable.
- 2.17 Beyond the site selection process and use of Green Belt as a 'gateway constraint', there is no evidence to demonstrate that the DLP's previously developed land only strategy will deliver the level of housing indicated. It is well evidenced that developing brownfield land comes with significant costs which impact viability, and longer lead in times due to the need for site clearance and demolition; site remediation; service diversions etc.
- 2.18 Additionally, brownfield sites offer high levels of density, leaving little space for new family homes with gardens. Lichfield's Banking on Brownfield report (June 2022) states that 48% of the homes on proposed sites on the register are likely to be apartments (sites of over 100dpa) whereas just 17% of households across the country are likely to live in apartments. This does not represent a balanced housing tenure and size offer.
- 2.19 As stated in Lichfield's Start to Finish Report (February 2020), large greenfield sites deliver quicker and more importantly, deliver at a quicker rate than brownfield sites. The DLP Viability Assessment notes that greenfield sites have an additional transactional step where the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence. However, the Foundation is the sole owner of both Racecourse Lane and Worcester Lane, eliminating the need for this additional transactional step. This single ownership streamlines the development process, potentially accelerating the delivery of housing on these sites.
- 2.20 Paragraph 5 in DLP3 confirms that Dudley's Green Belt boundaries will be maintained and protected from inappropriate development. As highlighted in the response to Policy DLP1, there exists a pressing need for new housing within the Borough and the wider housing market area. The Foundation believes that achievable and deliverable greenfield sites in the Green Belt, beyond the Growth Network, including land at

Racecourse Lane and Worcester Lane which, amount to an ‘urban extension’ and not a clear intrusion into the Green Belt being surrounded and adjacent to an established settlement, can contribute to sustainable development and reduce Dudley’s unmet housing need.

**Policy DLP10 Delivering Sustainable Housing Growth**

- 2.21 As stated previously, the minimum amount of new homes to be delivered under the plan period is short by circa 1,000 homes, so policy DLP10 confirms the plan can accommodate 90.98% of the Borough’s current housing need.
- 2.22 The DLP Viability Assessment (November 2023) provides an appraisal of priority sites as identified by the Borough in the DLP Part Two to determine their viability and contribution towards housing needs of the plan. These are:
- Ketley Quarry (Policy DLPKQH)– 650 dwellings
  - Land at Waterfront Way (Policy DLPBHPS1) – 600 dwellings
  - Daniel’s Land (Policy DLPBHPS2) – 300 dwellings
  - Land at King Street / Flood Street (Policy DLPDPS1) – 120 dwellings
  - Land at Trindle Road / Hall Street / Birdcage Walk (Policy DLPDPS2) – 280 dwellings
- 2.23 Out of the five sites, only Ketley Quarry is assessed as viable, with the other four deemed ‘marginal’. As noted in in page 109 in the DLP Viability Assessment, the appraisal incorporated generalised remediation costs which may not be fully representative of the costs required to remediate the Ketley Quarry Site.
- 2.24 The four other sites are in areas of ‘low value brownfield’ and require large infrastructure and site remediation costs to unlock the site, as well as overcoming other significant constraints. This is confirmed by paragraph 10.15 in the DLP Viability Assessment which states that for Dudley to achieve its housing need it is likely grant funding will be required to facilitate development - particularly on Brownfield sites with an industrial legacy to overcome and/or in a low value market area. NPPF paragraph 11 underscores the need for strategic policies to, at a minimum, address objectively assessed needs for housing and other uses. The DLP falls short of meeting its own needs, and if allocated sites, such as those listed above, fail to materialise, the housings shortfall would be even more significant.
- 2.25 Exceptional circumstances have been established given all brownfield development opportunities have been exhausted and yet the borough’s housing needs are still not proposed to be met in full. It is evident that the Council should thoroughly evaluate its Green Belt boundaries to accommodate its current development needs. The Borough should diversify its housing supply strategy by considering a carefully selected mix of brownfield, greenfield, and Green Belt sites for development such as Racecourse Lane and Worcester Lane.

2.26 This approach will enable the Borough to minimise its risk of further housing supply shortfalls and maximise its potential to meet its housing needs. This would align with NPPF paragraph 60, which emphasises the need for a sufficient and diverse range of land available for development to meet the Government's objective of significantly boosting the supply of homes.

## Conclusion

2.27 NPPF paragraph 35 outlines the criteria for evaluating the soundness of local plans and spatial development strategies. Paragraph 35 emphasises the importance of sound local plans and spatial strategies in guiding development decisions and ensuring sustainable and well-planned growth throughout England. Table 2.2 below outlines the Foundation's response to each strand of soundness when considered in the context of the preparation of the DLP.

**Table 2.2: Test of Soundness**

Strand	Objective	The Foundation's comment
Positively prepared	Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.	The DLP does not meet the Borough's objectively assessed housing need. Whilst there have been discussions with neighbouring authorities, there are no formal agreements with neighbouring authorities so that its unmet need can be accommodated elsewhere.  It can be concluded that the DLP has not been positively prepared.
Justified	An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	The site assessment methodology is not well-found and does not evaluate sites outside of the urban area. There is no compelling justification for this.
Effective	Deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	The DLP unmet housing need has been deferred rather than considered within the Borough's boundary via an appropriate site assessment. There is no formal Statement of Common Ground agreed between Dudley and its neighbouring authorities. As such, it can be concluded that the DLP is not effective.
Consistent with National Policy	Enabling the delivery of sustainable development in accordance with the policies	The golden thread of the NPPF is achieving sustainable development. Achieving sustainable development

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in this Framework and other statements of national planning policy, where relevant

means that the planning system has three overarching objectives (environmental, social, economic). For plan-making all plans should promote sustainable pattern of development that seeks to meet the development needs of their area, aligns with growth and infrastructure and mitigates climate change. The DLP does not meet the needs of the area and does not support the Government's objective of significantly boosting the supply of homes. It can be concluded that the DLP is not consistent with national policy.

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- 2.28 To align with the objectives of the NPPF and ensure the plan is legally sound, the Borough should consider reviewing and adjusting Green Belt boundaries to address the identified needs, as reflected in our responses to the policies above. Exceptional circumstances have been clearly demonstrated in our proposal to modify Green Belt boundaries through the new local plan, consistent with NPPF paragraph 145.

### 3. Summary

- 3.1 The Foundation welcomes the opportunity to engage with the Dudley Local Plan Regulation 18 consultation.
- 3.2 At present, the Foundation has serious concerns that the DLP will fail the test of 'soundness' as outlined at NPPF paragraph 35.
- 3.3 As demonstrated at Section 2 of these representations, the Foundation has concerns regarding the Borough's spatial strategy which seeks to maximise development on brownfield in the Growth Network and restrict development outside the Growth Network, in particular, development on the Green Belt.
- 3.4 It has been demonstrated that the Borough is not able to solely rely on brownfield land to meet its housing need. Furthermore, there is a significant unmet need in the wider housing market area. As such, exceptional circumstances as outlined at NPPF paragraph 145 have been demonstrated and the Borough should review its Green Belt boundaries.
- 3.5 The new Local Plan should be prepared with a balanced approach towards addressing the Borough's objectively assessed needs. The site assessment should consider all available sites within the Borough and undertake a comprehensive and holistic review, including sites in the Green Belt. Indeed, Green Belt should not be treated as a determinative factor as to whether a site should be selected or not, instead it should be considered as part of the overall balance. Sites should be selected in the right locations that provide sustainable and accessible development which deliver housing that addresses local needs.
- 3.6 The Foundation has actively promoted Racecourse Lane and Worcester Lane as a sustainable and deliverable opportunities for new homes and associate infrastructure. Both sites are under the sole ownership of the Foundation.
- 3.7 The Land to the West of Worcester Lane, Stourbridge, would provide 120 new market and affordable homes and associated infrastructure, such as extensive open space and new recreational routes. Worcester Lane is unconstrained and located in an accessible location close to existing residential development, that can contribute to the Borough's housing need in the short to medium term. Worcester Lane is suitable, available, and development is achievable and was previously proposed for allocation in the Draft Black Country Plan 2039.
- 3.8 The Land at Racecourse Lane would create a new community offering a diverse range of 650-700 new homes in a highly accessible and sustainable location whilst retaining the provision of a golf course. There are also significant wider community benefits such as the provision of a new primary school, nursery and healthcare facility, extensive public open spaces, biodiversity enhancements and highway improvements.
- 3.9 We would welcome the opportunity to discuss the contents of these representations further with officers and to discuss both sites' potential to assist them in contributing the Borough's housing supply for the plan period.

# **Appendix 1: Racecourse Lane - Concept Masterplan**

## **Appendix 2: Racecourse Lane - Ecology Technical Note**

## **Appendix 3: Racecourse Lane - Transport Technical Note**



## **Appendix 4: Worcester Lane - Illustrative Layout**

## **Appendix 5: Worcester Lane - Constraints and Opportunities Plan**

**Appendix 6: Worcester Lane - Arboricultural  
Survey Report**

**Appendix 7: Worcester Lane - Geotechnical  
Technical Note**

## **Appendix 8: Worcester Lane - Noise Assessment**

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## **Appendix 10: Worcester Lane - Transport Appraisal**

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