

1051_04_SW/IM
15 December 2023

F.A.O Mr Bart Shirm
Planning Policy Department
Call for Sites
Sandwell Metropolitan Borough Council
PO Box 2374
Oldbury
B69 3DE

VIA EMAIL ONLY

Dear Sir/Madam,

**RESPONSE TO THE NEW SANDWELL DRAFT LOCAL PLAN: REPRESENTATIONS
RELATING TO 192-200 DUDLEY ROAD, OLDBURY, BIRMINGHAM, B69 3DS**

WWA has been instructed by our client, Mr Mukarram Sattar, to submit this representation in response to the consultation on the draft Sandwell Local Plan. In this respect we note that the Council has a significant under-supply of housing, with paragraph 2.61 stating that the housing need is 29,773 dwellings by 2041. However, the identified supply of homes is only 11,167, resulting in an unmet need of 18,606 dwellings. This is a very significant under supply and we consider that there is suitable land at 192 – 200 Dudley Road, Oldbury that could make a contribution towards meeting this shortfall and therefore should be allocated in the Local Plan for development.

Below is a description of the site; its surroundings and why it is an appropriate site for allocation in the Local Plan for a residential-led mixed use scheme.

Site Description and Surroundings

The site consists of a number of commercial buildings, including a petrol station, car repair and services, a hand car wash, hardstanding area and two-storey dwellings. One of the dwellings is separated from the rest of the site by a track used to access the properties on Payton Close and Brades Road. The commercial buildings on the site fall within sui generis use class, with the residential dwellings falling within Use Class C3. The site measures approximately 0.58 hectares. The site is currently unattractive, containing a large number of parked cars as shown on the google maps aerial image below and therefore detracts from the character of the local area and its redevelopment would enable significant environmental enhancement.



Source: Google Earth (December 2023)

The site is within a sustainable area with Oldbury Town Centre located 0.64 km (0.4 miles) southeast of the site which is a 7-minute walk away, where a wide range of services can be found. Albion Street bus stop is located approximately 60m southeast of the site, from which frequent services can be accessed to Dudley Centre, Birmingham City Centre, and the areas in between. Sandwell and Dudley Railway Station is located approximately 1.28 km (0.8 miles) east of the site, which is a 16-minute walk away, and this provides frequent services to surrounding towns and cities, as well as other stations within Birmingham. The site is adjoined on its north-west, south-west and south-east boundaries by residential uses, and there are commercial uses within the immediate area including a takeaway, a pub, a car wash and a tyre sales shop. The Brades Road employment site is only 200 metres from the site. The Oldbury Health Centre is 1 km away. The Luxmy Foodstore is located 200 metres from the site. The Brades Primary School is approximately 700 metres away, with the Ormiston Sandwell Community Academy a similar distance away. The Meadows School which caters for children with disabilities is only 400 metres away. The site therefore is located in a highly sustainable location and meets the criteria for high density development of 45+ dwellings per hectare as set out in emerging Policy SH03.

Statutory and Non-Statutory Designations

The site is not subject to any statutory designations and is not located within a conservation area and does not contain any Listed Buildings or other buildings that have any special architectural or historic merit, either nationally or locally. The site also has no designations relating to landscape or biodiversity value. The site is located in Flood Zone 1 where there is a low risk of flooding. The site is therefore unconstrained with respect to environmental designations.

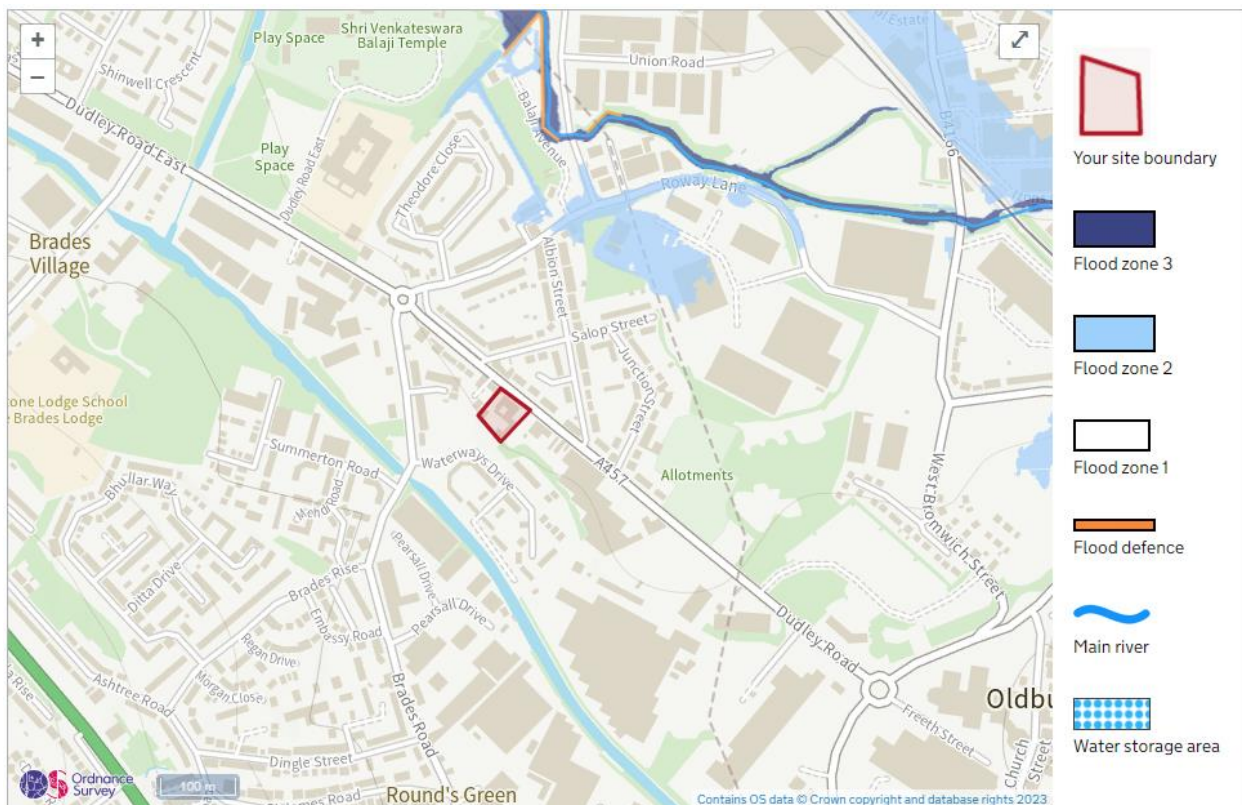


Figure 1. Flood Risk Map for Planning (Source: Environment Agency, 2023)

Emerging Development

There are a number of sites allocated for development in the Draft Regulation 18 Sandwell Local Plan that are in close proximity to the site to the north-west (highlighted orange in Figure 2). These partly fall within the Dudley Port and Tipton Regeneration area and have been identified as suitable for residential development. Allocated less than 100m south-east of the site is a mix of Local and Strategic Employment Sites (highlighted blue and purple in Figure 2). The site is therefore situated on a key route which would benefit from a residential-led mixed use development.

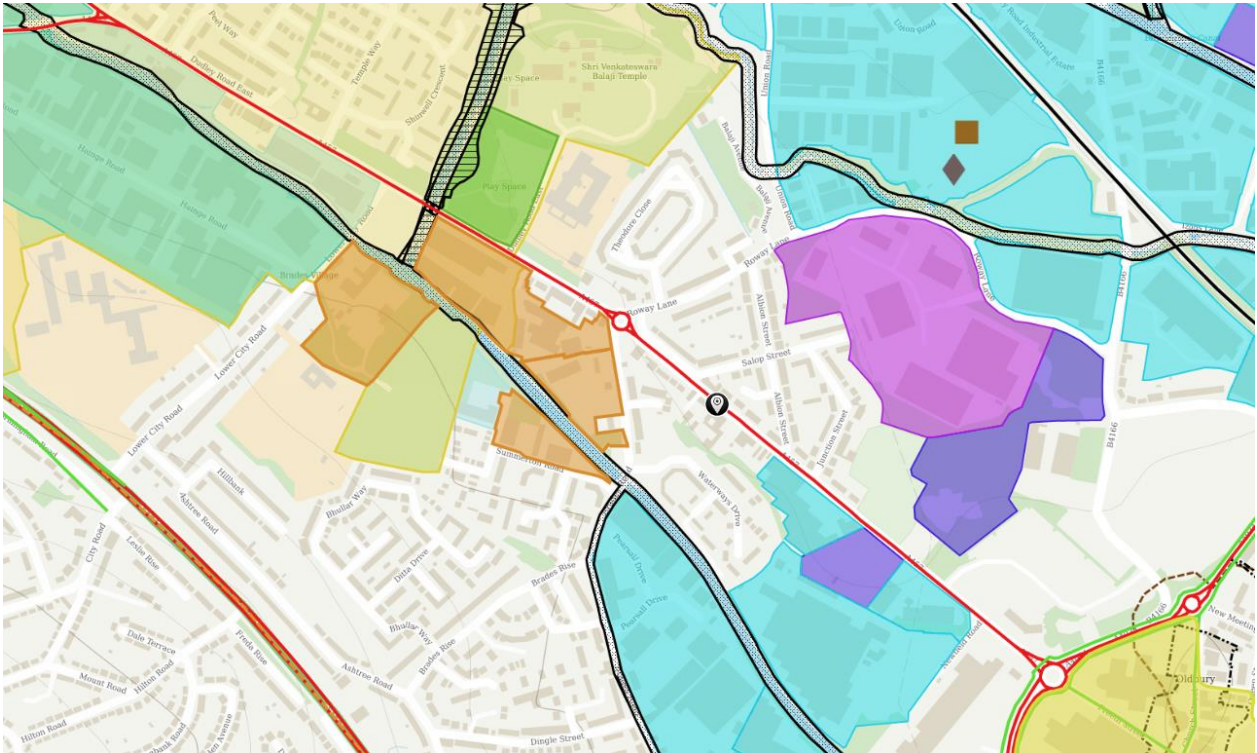


Figure 2. Sandwell Local Plan Policies Map (Source: Sandwell Metropolitan Borough Council, 2023)

New Emerging Local Plan (2041)

The Development Strategy is set out in the proposed Policy SDS1 which states that the Sandwell Local Plan seeks to ensure that growth is sustainable by:

- a) *'delivering as much new development as possible on previously developed land and sites in the urban area;*
- b) *allocating housing in locations with the highest levels of sustainable transport access to residential services (retail provision, schools, healthcare facilities, fresh food, employment etc.);*
- c) *regenerating existing housing and employment areas and help them deliver:*
 - i. *cleaner, more energy-efficient and more intensive areas of growth; and*
 - ii. *improving the environmental, climate change, accessibility and socio-economic capacity of existing residential and employment areas;*
- d) *allocating new employment land where sustainable access and good public transport links are available;*
- e) *taking advantage of existing and improved infrastructure capacity to maximise development on new sites;*
- f) *supporting and enhancing the sustainability of existing communities through the focussing of growth and regeneration into West Bromwich and other town centres and regeneration areas (Policy SDS2);*

- g) protecting and enhancing the quality of existing towns and local areas and re-balancing the housing stock by delivering homes supported by jobs and local services.'*

The land which we are arguing should be allocated at 192-200 Dudley Road, Oldbury, would contribute towards the achievement of these sustainable development objectives as it is previously developed land; has the highest levels of sustainable transport access to residential services; would regenerate an existing housing and employment area and help deliver a cleaner, more energy efficient development; would significantly improve the environment; is located on the Sedgley to Birmingham key route network where the Council is seeking to improve sustainable modes of transport; would deliver much needed new housing, whilst also protecting and enhancing the quality of this area of Dudley Road.

Delivering as much new development as possible on previously developed land will continue to be a key part of Sandwell's spatial strategy. Those components of the Development Strategy identified in the draft Local Plan which could help to increase the supply of land for housing in Sandwell, include amongst other things, mixed land uses and increasing housing densities. In this respect, the site represents an opportunity to satisfy both of these aspirations within the emerging Local Plan.

Achieving Greater Densities in Sandwell

The latest SHLAA (April 2022) and the Urban Capacity Appraisal (November 2023) outlines that there is a potential uplift in housing capacity which could be achieved through adoption of higher densities. This has been explored through the Sandwell Local Plan, with Policy SHO3 of the Draft Regulation 18 Sandwell Local Plan setting out the **minimum** density standards as 100 dwellings per hectare where accessibility standards for very high-density housing are met and the site is located within West Bromwich; 45 dwellings per hectare where accessibility standards for high density housing are met, and 40 dwellings per hectare where accessibility standards for moderate density housing are met.

There will be variation across Sandwell but this acknowledges the density optimising approach that is set out in national policy which seeks to maximise the use of land.

Proposed Residential-led Regeneration

The landowner submits the 192-200 Dudley Road site for allocation in the forthcoming Local Plan for a residential-led mixed use scheme that aligns with the emerging local plan objectives. Based upon the analysis of housing densities undertaken by the Council, the redevelopment of the site could accommodate a minimum 50-80 flats above the commercial units on the ground floor, subject to architectural design and proposed number of bedrooms. These figures should be used as an approximate indication only.

From our own experience, it is conceivable that a sensitively designed, high-density scheme could come forward as part of a comprehensive redevelopment of the site, which could encourage and rejuvenate surrounding area. As such, it is envisaged that the site could make a significant contribution towards meeting Sandwell's housing need as well

as significantly enhance the character and appearance of the surrounding area. Invariably, as mentioned above, the variation in house types, sizes, internal layout and site conditions will determine the number of homes achievable. Ultimately, the quantum of development that can be delivered will be subject to detailed planning and design considerations.

The site represents a significant development opportunity to deliver a mixed-use development in a sustainable location that is suitable and available for delivery in the short-medium term. The redevelopment of the site would significantly enhance the character and appearance of the area.

Conclusions

The principle of the requested Local Plan allocation for a residential led mixed use development meets with the emerging ambitions presented as part of the Sandwell Draft Local Plan 2041.

The use of brownfield land is a priority for both local and national government and has been a key part of Sandwell's development strategy for many years. The site represents available and developable previously developed site in a highly accessible and connected location, identified for sustainable growth over the plan period to 2041

The site is also wholly located within Flood Zone 1, where there is a low probability of flooding, and so accords with the Government's policy on flood risk.

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. There are three dimensions to sustainable development: Economic, Social and Environment. The allocation of this site would deliver substantial social, economic and environmental benefits and therefore represents highly sustainable development. Given the site's accessibility, excellent connectivity and the number of residential properties in the near vicinity, the site is suitable, available and appropriate for residential-led development.

Our clients control the land the subject of this representation, which is considered suitable, available, achievable and appropriate for housing development. The site would assist meeting an immediate need for providing local housing as well as meeting the district wide need. Given that the site has no statutory restrictive designations, allocating this land would make effective use of previously developed land. It provides for a sustainable approach to the planning of the settlement. The allocation of this site achieves all three sustainable dimensions as mentioned above. For these reasons we consider that the site should be allocated for a mixed use housing-led development in the emerging new Local Plan (2041).

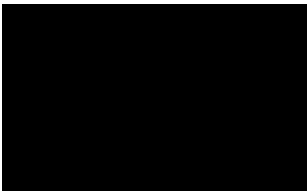
There are no restrictive covenants or other obstructions to development and the development would be able to proceed within 0-5-year framework given the immediate availability of the subject site.

Existing Use	Proposed Use	Available	Suitable	Deliverable	Sustainable	Timescale
Brownfield Land	Residential led Mixed use	√	√	√	√	0-5 years

The subject site should be identified as an allocated site for residential led mixed use development in the next stage in the plan-making process.

WWA would welcome the opportunity to discuss this site with you further. If there is any additional information which you require, please get in touch.

Yours sincerely,



Ifti Maniar
Planning Director
BArch, MA, MSc, MRTPI

cc: Mr Mukarram Sattar (by email only)

Encs. Location Plan