



# Suzanne Webb MP

*Member of Parliament for Stourbridge*

Black Country Plan  
Planning and Regeneration  
Dudley Council  
Council House  
Priory Road  
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To whom it may concern,

I am writing to oppose proposed development on several sites in my parliamentary constituency of Stourbridge, covering two main areas:

- **Land adjacent to Worcester Lane, Pedmore (Ref: DUH206, DUH207 and DUH209)**
- **Former grazing land at Wollaston Farm (Ref: DUH217)**

I want to precis this response by mentioning very briefly my role as a Member of Parliament. As I have made consistently clear, I am a consultee and my role as an MP offers me no additional powers regarding the Black Country Plan. I have, however, used my voice and position to encourage residents to have their say.

Throughout the consultation period, I have spoken directly to hundreds of residents, and corresponded with hundreds more, all of whom have very strongly opposed any development on the sites I have listed. I have visited each site multiple times and have attended numerous public meetings. My overarching conclusion is that it is more than fair to say that local reception to these plans has been *unanimously negative*. We need to do planning better. Let's start now.

I object to these proposals on four main grounds: -

1. Brownfield First

The Prime Minister has recently said that we should be "building beautiful homes on brownfield land in places that make sense". I agree completely with his statement.

I believe that the region should also adopt a brownfield first policy so these unnecessary proposals can be stopped.

I have always believed very strongly in building on brownfield sites before any green belt site can be considered. It is my belief that there is more work to be done to identify brownfield sites in the Dudley Borough. In this way, the homes earmarked for the sites could be built elsewhere, preserving precious green belt for residents.





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Not only does this preserve existing green belt sites, but it also regenerates and invigorates areas that have often been left to decay or have at the very least been grossly underused. In my view, extra resources deployed to identifying and analysing brownfield sites would considerably outweigh the damage that could be done to green belt land. Evidence has also shown that building on these sites is often quicker than building on green belt sites.

The West Midlands Combined Authority (WMCA) has also secured £33m from the Brownfield Housing Fund (BHF), which allocates cash to bring old industrial sites back into use. Whilst I note this will not reduce housing targets in the Black Country Plan, it is a welcome move to expedite the use of brownfield sites that require remediation over releasing land from the Green Belt.

### 2. Preventing Urban Sprawl and Building Back Beautiful

We need housing targets reduced in the region to stem the flood of high-density development, which is creating immense pressure in commuter areas and our infrastructure and creating urban sprawl.

In 2017, Birmingham City Council adopted its Development Plan which paved the way for a monolithic urban extension of 6,000 homes on green belt land, mainly in Sutton Coldfield. The plan failed to consider thousands of negative responses during the consultation. It is expected that only around 2,000 – perhaps fewer – will be delivered by the Plan's end date of 2031. Residents have been left with a plan that fails to address the real housing need of local people.

There is a real risk the same could happen should the Black Country Plan be approved in its current state. An increasing body of evidence supports the fact that increasing densification and fragmentation of green spaces, propagated by 'filling in the gaps' around urban development, feeds a plethora of negative outcomes. These include increased traffic congestion (with the resultant pollution), greater energy use and the destruction of wildlife habitats.

These points are particularly relevant to site ref DUH217 (though sites DUH206, 207 and 209 also suffer) at Wollaston Farm – a slither of green space amongst hundreds of other homes. As well as the negative consequences mentioned above, development here would further degrade the distinctiveness and character of the area. A hard to measure metric, but certainly one that is mentioned time and again by residents.

For many years, urbanism has been turbo-charged with a mandate for place-making on the edge of our cities. We must let the environment be the turbo-charge for future place-making and build homes for the future that are truly environmentally led and that reflect both the surrounding community and the land that is used.

### 3. The value of Green Belt land

Green belt land is precious and once lost can almost never be reclaimed.

National Planning Policy Framework (NPPF) Section 13: Protecting Green Belt Land – Paragraphs 137-151. The policy makes it very clear that *"The government attaches great importance to Green Belts. The*

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*fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

That Green Belt boundaries should only be altered where exceptional circumstances exist. It is not clear what the exceptional circumstances are thought to be for the inclusion of DUH206, 207, 209 and 217 in the plan.

Each piece of green belt land lost to development degrades the environment and weakens the long-term health of our communities.

As well as being a rich habitat for many different species, we cannot undervalue the benefits to our mental health that green spaces provide. Throughout the pandemic, people have been telling me how useful walking in the fields and in nature have been to their mental health. If ever there is a time to protect local green space, it is now. Living near a piece of land on which you can walk freely in the fresh air is a necessity in a major residential area. Each site I have mentioned in this response falls within this category. In a Borough which has been historically highly industrialised, local people defend their green spaces vigorously for these reasons.

Whilst both the Wollaston site and the Pedmore sites share these benefits, each has its own unique risks. The Wollaston site, Ref DUH217, as I have mentioned, is a green oasis in an otherwise built-up area. To build here would be to remove access to rare green space in a heavily residential area. In Pedmore, the sites Ref DUH206, 207 and 209 enhance the character of the area. People value the green space dividing Hagley and Pedmore, and many move to the area for its benefits. Similarly, visitors to the area are attracted from nearby Birmingham and Wolverhampton to enjoy the more rural surroundings.

Importantly if the land is released, it would mean houses in the wrong place –denying people the chance of home ownership, leaving many in a long term rental trap. It leaves people without aspirational living. It would leave a region bordering on urban sprawl.

#### 4. Infrastructure

Services are under pressure in and around Stourbridge, so much so that any increase in population could push at-risk infrastructure past a tipping point. Schools, GP surgeries, dentistry, social care, parking, and emergency services are all under pressure. Without sufficient provision to support an increased population, any housing development – whether on green belt or not – should be seriously questioned.

In addition, traffic is a major and worsening issue in Stourbridge. Congestion throughout the area causes disruption and environmental damage. Some roads in Stourbridge are amongst the worst for air pollution in the Borough. There is no doubt that further significant development, resulting in hundreds more cars on local roads, will worsen the local situation. More specifically, considering sites DUH206, 207 and 209, Worcester Lane – a busy, single track road - would struggle to support any further service roads to residential developments. The same could be said for Kingsway in Wollaston, which is also very close to a local school.

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### My comments on the consultation process

Working with communities gets better results than leaving them out of the process.

It would be remiss of me to not comment on the consultation process. Whilst it is for the planning inspector to deem whether it has met regulatory requirements, it is very clear there has been no real intent to engage effectively with the local community. A plan of the scale and size of the Black Country Plan required a more detailed and interactive consultation. There is also a need to ensure that a plan for over 15 years of growth is based on reasonable discussion with the community to form those assumptions and not one based on minimum requirements. After all, the community are the subject matters of the needs and wants of the area in terms of housing and infrastructure.

The complexity of the online process is widely known, understood, and acknowledged by the Council itself.

### **Comment on the designation of local green space at Corbett Meadow**

I also write to welcome the proposed designation of the Corbett Meadow as Local Green Space (Policy DSA4).

In conjunction with this, I support Policy ENV1 (Nature Conservation and designation of Corbett Meadow as a Site of Local Interest for Nature Conservation); and ENV5 (Historic Character and Local Distinctiveness of the Black Country and designation of Corbett Meadow (Dudley) as Area of High Historic Landscape Value)

I support the work of the Corbett Meadow Action Group (CMAG) and fully endorse their submission to this consultation.

This concludes by submission. When the plan reaches public examination, I would very much like to attend.

Yours faithfully,

**Suzanne Webb MP**

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