



Flitcroft House
114-116 Charing Cross Rd
London WC2H 0JR
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Black Country Core Strategy
Planning Services
Dudley Metropolitan Borough Council
Council House
Priory Road
Dudley
DY1 1HL

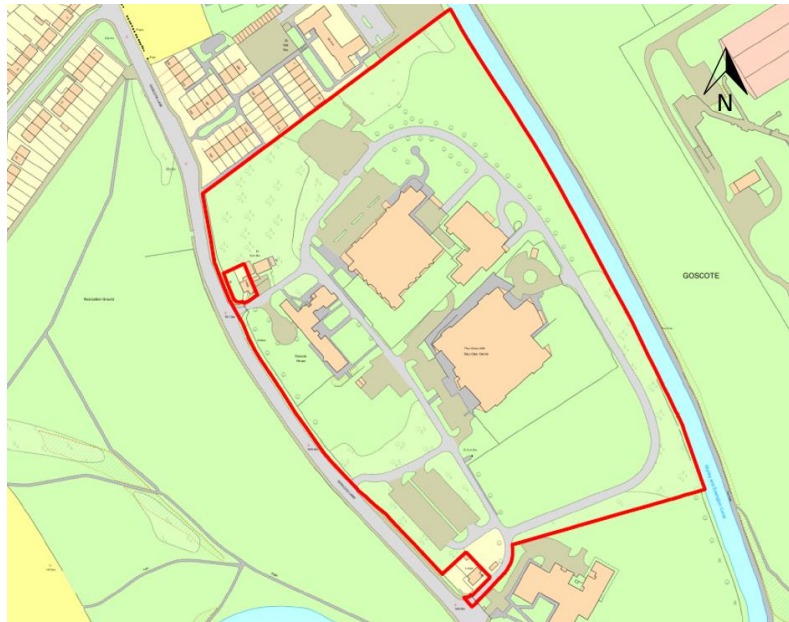
8th September 2017

BY EMAIL

Dear Sir/Madam

**BLACK COUNTRY CORE STRATEGY ISSUES AND OPTIONS CONSULTATION – LAND AT
FORMER GOSCOTE HOSPITAL SITE, GOSCOTE LANE, WALSALL, WS3 1SJ**

On behalf of our client, NHS Property Services Ltd (NHSPS), who are the landowner of this site (plan below), we wish to make representations, in respect of the above site, to the Black Country Core Strategy Issues and Options Consultation. These representations are accompanied by a Site Location Plan contained within the Constraints and Concept Plan design document. This document sets out an indicative capacity to support these representations.



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In addition, a Call for Sites form is submitted with these representations, in response to the Call for Sites exercise which runs parallel to the Issues and Options Consultation.

a. NHS Property Services Site Ownership

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

In particular, NHSPS's Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process.

By way of background, local health commissioners are currently developing a strategy for the future delivery of health services in this area. This will involve the release of certain NHSPS landholdings which are no longer required for the delivery of health services.

The existing health and social care buildings are to remain on site, and continue to be operational. However, the site includes a number of areas with development potential. In particular, the southern and western land parcels of the subject site including Goscote House are likely to be considered surplus to the operational healthcare requirements of the NHS. Confirmation is expected within the next 12 months. These site parcels should be therefore be considered suitable for alternative uses including a range of residential accommodation, depending on the needs of the local community. In addition, NHSPS are reviewing the wider site to understand any further development opportunities. In this regard, these representations seek the release of this entire site from the Green Belt. The subject site is considered available, suitable and deliverable within the initial 5 year period.

b. Site Context

Goscote Lane is located within the small town of Bloxwich, to the north of Walsall. The site lies on the western boundary of Bloxwich.

The site is approx. 2.0 Ha with direct access off Goscote Lane, to the north of the residential area of Walsall. Formerly Goscote Hospital, the site now includes a Social Care Centre and Palliative Care Centre, as illustrated on the drawing site constraints plan. The existing health and social care buildings are to remain on site, and continue to be operational. The wider site (all within NHSPS ownership) includes a number of areas with development potential.

The site is bound by low density residential development to the north, Goscote Lane to the west, Wyrley and Essington Canal to the east and Goscote Greenacres to the south.

The site is located 2.4km to the east of Bloxwich Train Station. The site is served by bus routes 25 and 26, which provide excellent connections to the services and facilities of Walsall, Bloxwich and Kingstanding. These bus stops are located on Goscote Lane, which borders the site.

The southern (C) and western (A and B) land parcels are likely to become surplus to the operational healthcare requirements of the NHS, and are being promoted to provide additional residential development and/or the provision of care home uses. The southern element currently comprises the locally listed Goscote House and associated car parking. The western element is currently undeveloped, and provides surplus land to the existing health and social care facilities..

As set out within these representations, it is considered that the wider site, which falls within the landholding should be released in its entirety from the Green Belt.

c. National Policy (NPPF) – Requirements for a Local Plan

The National Planning Policy Framework (NPPF) is the preeminent national policy; in law, regard must therefore be had to it. In summary, the following paragraphs of the NPPF are of particular relevance to the Local Plan making process, and should be complied with:

- a) Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. They should be consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development (Paragraphs 150-151).
- b) Proposed housing supply must meet evidential need for housing of all types, including a 5% buffer for five year housing targets (or 20% in cases of persistent under delivery), these targets must be deliverable. The Council must identify a supply for years 6-15 which is specific and developable (Paragraph 47).
- c) Local Plans should be aspirational but realistic. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan (Paragraph 154).
- d) Local Plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- e) There is a cross-boundary duty to co-operate, particularly with planning issues which relate to the strategic priorities. LPA's should work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans (Paragraph 178-179).
- f) The Inspector's primary task will be to consider the soundness of the submitted plan, this will be assessed against the following soundness criteria:
 - **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Housing White Paper (February 2017) urges local authorities to make more land available for homes in the right places by maximising the contribution from brownfield land, releasing more small and medium sized sites.

d. Overview of the Black Country Core Strategy

The Issues and Options consultation is the first stage of the review of the Black Country Core Strategy. The Core Strategy is a key part of the Local Plan for the Black Country Local Authorities which covers

the areas of Dudley Metropolitan Borough Council (MBC), Sandwell MBC, Walsall Council and the City of Wolverhampton Council.

The existing Core Strategy was adopted in 2011, covering the period up to 2026. Upon adoption, in accordance with national planning guidance, it was agreed that the Core Strategy would be reviewed in whole or in part at least every five years.

Since adoption there has been a number of changes to national policy, furthermore a housing shortfall has been identified in Birmingham which neighbouring authorities, notably the Black Country, have a duty to consider accommodating.

The Council state that although the Core Strategy is considered generally fit for purpose, this consultation stage will identify emerging issues and set out how the sustainable growth of the Black Country can be achieved.

The documents which make up the current evidence base for this consultation exercise, and are of key relevance to these representations, are set out as follows:

- Black Country and South Staffs Strategic Market Housing Assessment – March 2017; and
- Greater Birmingham and Solihull LEP Black Country Local Authorities Strategic Housing Needs Study – August 2015

Given the levels of growth to be planned for, care is needed to safeguard environmental and historic assets and to ensure enough services, such as open space, shops, schools and healthcare, are provided.

The strategic challenges and opportunities are expressed as a set of nine key issues. Of note, and focussed within these representations are:

- Meeting the housing needs of a growing population
- Reviewing the role and extent of the green belt

Meeting the housing needs of a growing population

The Black Country and South Staffs Strategic Market Housing Assessment (SHMA) 2017 concluded that the Objectively Assessed Housing Need (OAN) for the Black Country over the period 2014-36 is 78,190 homes. It is anticipated that the housing supply, identified in the SHLAA, can deliver 48,185 of the homes needed, approximately 60%. Identified sites and “windfall” sites could deliver approximately 8,000 homes. Initially, there is a gap between need and anticipated supply of around 22,000 homes across the Black Country.

The Greater Birmingham and Solihull LEP Black Country Local Authorities Strategic Housing Needs Study identifies a shortfall across the wider Housing Market Area (HMA) of approximately 38,000 dwellings.

The Black Country have committed to test the accommodation of an extra 3,000 homes up to 2031 beyond local need, to help address the shortfall in the wider HMA. This produces a total requirement for land to accommodate 24,670 new homes.

Given the foregoing, the Council acknowledge that a large number of new homes and supporting services will need to be accommodated outside the existing urban area of the Black Country. All such land in the Black Country is currently Green Belt.

Paragraph 3.15 of the Issues and Options Consultation document identifies that there may be potential to release limited areas of surplus open space for housing in some areas. The existing Goscote House site (Parcel A and B) could deliver 49 residential units.

In addition to this the vacant plot (Parcel C) could provide care-home uses comprising 5,600 sqm over 2 floors, and/or additional residential accommodation.

Needs of the ageing population

The SHMA provides guidance on the likely needs of different groups for housing over the new Plan period.

As set out within the Black Country Issues and Options Consultation, in addition to the SHMA, a key factor in household growth is that people are on average living longer than previous generations.

In particular, paragraph 6.30, of the Issues and Options Consultation, highlights a need for 162 new sheltered and extra care homes every year to meet the needs of older persons – 5% of the total housing need.

Utilisation of this site for the provision of care home uses, would contribute towards this need. Furthermore, a large percentage of the Black Country's ageing population rely on living within easy walking distance of healthcare. It is therefore important to locate new homes in areas with good access to existing healthcare and community services or where new, sustainable facilities can be created to serve new development.

Policy Area A, of the Issues and Options Consultation, focuses on Health and Wellbeing. Paragraph 6.10 stipulates that accessibility to health care and community facilities must be addressed in terms of location and physical access.

Accordingly, it is considered that redevelopment of this site, the provision of residential units, and or the provision of care home uses, would seek to achieve the objectives of Policy Area A. Furthermore, such redevelopment would meet the needs of the Black Country's ageing population, maintaining accessibility to existing health care.

Reviewing the role and extent of the Green Belt

As set out above, evidence has identified that a significant amount of Green Belt will be required to help meet the housing need within the Black Country and the wider HMA. Given this, it has been decided that a formal review of the Black Country green belt should be carried out through the Core Strategy review.

In this instance, two studies have been commissioned. The evidence base for Key Issue 6 will comprise:

- Greater Birmingham and Black Country Housing Market Area (HMA) Strategic Growth Study; and
- Black Country Green Belt Review.

We expect that the two studies together will provide a robust and thorough examination of the green belt to assess and identify the potential to release sites from the green belt, alongside growth within the urban area, to meet the projected needs identified for housing and employment growth up to 2036.

This site is located within the Green Belt. Given the existing built form, the land at Goscote Hospital which falls within the red line boundary, constitutes previously developed land within the Green Belt.

It is evident, as set out below, that the site in its entirety, encompassing the existing health and social care facilities, does not serve the five purposes of the Green Belt. Accordingly, these representations seek the release of the entire site from the Green Belt.

Given the Evidence Base for the Black Country Issues and Options document, it is apparent that extra homes required across the Black Country will need to be built on Green Belt land.

Paragraph 1.19, of the Issues and Options Consultation document, seeks to ensure that that any release of green belt sites for development does not take place at the expense of urban regeneration. Given the characteristics of this site, this is not a concern which should be associated with future development in this location, as small scale redevelopment would ensure that the characteristics of this area are retained.

The NPPF identifies that Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt is central to the Black Country Core Strategy. It is considered, that when assessing the function this site performs within the Green Belt, it is very low.

The sites natural boundaries, prevent future development from unrestricted sprawl and the countryside from encroachment. Given the sites location, redevelopment would not result in neighbouring towns merging together. Furthermore, redevelopment of this site, given its existing built form would encourage the recycling of derelict land, which should take preference over untouched green belt land.

Accordingly, when reviewing release of land from the Green Belt, given the foregoing, it is sites such as this which should be considered first.

e. Reviewing the Spatial Strategy

Strategic Option 2A seeks to accommodate housing growth outside the urban area. Within this option, two broad Housing Spatial Options have been identified.

Spatial Option H1

Spatial Option H1 is based on 'round off' the Green Belt edge. It is considered that this could be done by way of a large number of small to medium size sites.

We consider that this is a suitable option for future growth of the Black Country, specifically Walsall. It is anticipated by the Council that sites could range in size from a few homes to hundreds of homes, where this would provide a defensible new green belt boundary and sufficient services exist. Furthermore, identifying large and medium sites would not require significant infrastructure, and would be deliverable in a lesser time period.

The site at Goscote Lane should be identified as one of such sites, given that it adjoins the existing built up area and contributing to the housing need of Walsall and the Black Country. This site is available, achievable and deliverable.

Spatial Option H1 would provide for development to take place within the urban area closer to where need arises.

Spatial Option H2

Spatial Option H2 seeks to identify a limited number of large scale Sustainable Urban Extensions (SUEs). It is considered by the Council, that such an option would significantly boost the supply of housing and maximise provision of affordable housing.

Given that no SUEs are currently being promoted in the Black Country it is considered that a significant level of work would be required in order to identify suitable locations. Consequently, such sites would require a range of infrastructure and services.

It is considered that Spatial Option H2 would concentrate delivery later in the plan period, and place a heavy reliance on a limited number of large sites.

In our view, exploring both options H1 and H2 would seek to ensure housing is delivered across the Black Country in the short and long term. Both options would promote wider choice and opportunity within the housing market and allow diversification of the housing stock.

In utilising both spatial options, housing units could be delivered in the short term, building upon existing infrastructure. Whilst locations could be identified for SUE's and understand the need, timing and cost of the range of infrastructure and services required.

f. Walsall's Role within the Black Country Core Strategy

Two of the key objectives for the Walsall Site Allocations Document which the Black Country Core Strategy seeks to support are:

- To deliver sustainable communities through the development of new housing on vacant, derelict, and under-used land...to provide a range of homes that meet the needs of all members of the community.
- To provide a regeneration strategy for Walsall that promotes sustainable growth within the existing urban areas whilst protecting the Green Belt from inappropriate development.

Furthermore, re-using previously developed land and providing smaller housing sites means that there is unlikely to be a need for significant new infrastructure to serve the redevelopment of this site.

In addition to the aforementioned, Walsall have set a target of providing 95% of new dwellings on previously developed land. All of these principles are supported within the Black Country Core Strategy, and therefore support the release of this site from the Green Belt, and more specifically the redevelopment of parcels A, B and C for residential development and/or the provision of care home uses.

g. Development Potential

Given the foregoing, it is considered that this site would be suitable for small scale residential redevelopment and/or the provision of care home uses.

In the first instance, it is imperative to note, this site is being promoted at this stage, and within the Call for Sites, as it is achievable, capable of being delivered within the early years of the plan period (0-5 years) and viable. In addition, the site responds positively to a number of the Core Strategy objectives.

A conceptual masterplan is included within these representations at Appendix 1. This indicative masterplan demonstrates that the site can accommodate 49 residential units and the provision of care home uses (approximately 5,600 sqm). It is anticipated, at this stage, that redevelopment would comprise the existing Goscote House (A), existing car parking (B) and vacant land (C).

It is anticipated, at this stage, that this would provide 21 flats and 28 houses comprising the following housing mix:

- 9 x 1 bed flats;
- 12 x 2 bed flats;
- 7 x 2 bed houses; and

- 21 x 3 bed houses.

Policy HOU2: Housing Density, Type and Accessibility sets a framework for determining the most appropriate house type mix at a local level. The Policy also sets a net density range of between 35 dwellings per hectare and 60 dwellings per hectare for the majority of sites.

Paragraph 6.29 of the Issues and Options Consultation document notes the importance that Green Belt release locations should be chosen on the basis of good walking, or public transport, access to residential services, however achieving high levels of access may be more difficult on the urban fringe.

This mix is indicative only at this stage to demonstrate the potential capacity of the site. The landowners welcome the opportunity to engage with the planning authority in terms of the detailed design of the proposals and the nature of the residential mix.

h. Summary and Conclusions

The issues and options document sets out that a large number of new homes and supporting services will need to be accommodated outside the existing urban area of the Black Country, all of which is currently in the green belt.

These representations set out and confirm the justification for the release of this site from the Green Belt. It is evident, that the wider site does not perform against the purposes of the Green Belt set out in the NPPF.

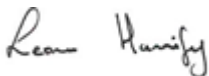
Accordingly, redevelopment of parcels A, B and C would provide a contribution to the Black Country housing need, which is currently identified as 21,670 new homes, and/or the provision of care home uses. The Constraints and Concept Plan design document includes an indicative capacity to support the main representations at this early stage. These representations therefore promote and identify the land at Former Goscote Hospital as a suitable site to contribute towards these requirements.

As detailed above, it is considered that the redevelopment of the land at Former Goscote Hospital, would contribute to the Council's Housing Need. This site presents an excellent opportunity for a modest, residential redevelopment and/or the provision of care home uses on previously developed Green Belt land. Small scale redevelopment would ensure that the characteristics of this area are retained, without the need for significant infrastructure.

Given the foregoing, it is evident that the land parcels at the Former Goscote Hospital site are achievable, capable of being delivered and viable.

We would request to be kept informed of future stages of the Local Plan preparation. If you require any further information, please contact the undersigned (email: lhannify@iceniprojects.com Tel: 0203 435 4213) or my colleague Sophie Hardy (email: shardy@iceniprojects.com Tel: 020 3435 4217).

Yours sincerely,



Leona Hannify
DIRECTOR