



Representations to Black Country Core Strategy Issues and Options Report September 2017

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Introduction

- 1.1 These representations are made to the Black Country Issues and Options report by Peveril Securities. Peveril is a commercial and residential developer based in the Midlands with a long track record of delivering employment and housing sites. Amongst Peveril's current projects are a large site where planning permission has recently been received (formerly Green Belt) for housing and commercial uses adjacent to the proposed HS2 station at Toton, Nottingham. The company also has a joint venture with another developer which is seeking to bring forward the Royal Ordnance Factory site at Featherstone to the north of the M54. The company also brought forward the Wolverhampton Business Park on the eastern edge of Wolverhampton.
- 1.2 The company controls land located to the south of the M54 between junctions 1 and 2, and owns land broadly speaking between the outskirts of Wolverhampton and Cannock Road further to the east and the M54 to the north. The area of land controlled is shown on Land Inclusion plan.
- 1.3 Peveril welcomes the opportunity to participate in the Core Strategy process in the Black Country including South Staffordshire. The company has made representations to South Staffordshire's emerging Sites Allocations Document in the context of the current Core Strategy. These seek to bring forward an extension to the Royal Ordnance Factory site (as SSBC propose) and also to request South Staffordshire Council safeguard land for the further expansion of Hilton Cross as a strategic employment site within South Staffordshire.
- 1.4 The representations made by Peveril seek to cover the following areas and issues raised within the Black Country Issues and Options report:
 1. The overall scale of housing being proposed.
 2. The overall scale of employment land being proposed.
 3. The strategy for the release of strategic sites (including Green belt) for both housing and employment.
 4. The use of regeneration corridors to promote growth.
 5. Other factors and timing.
- 1.5 Peveril welcome the progress that is now being made within the Black Country authorities with a view to proposing a strategy for defining of the appropriate scale of housing and employment land regarded as appropriate (mainly as an overspill for Birmingham) up to 2036. The strategy of accepting at the outset that in order to meet such needs there will be a

requirement for significant release of Green Belt is supported. In addition Peveril supports the inclusion of South Staffordshire as a location to meet housing needs given it is a sub market of the HMA. Peveril welcomes the need to comprehensively review the Green Belt as part of the growth strategy and agrees that the authorities should take a realistic view of the scale of land likely to be required to meet future needs.

Comments on Overall Housing Land Requirement (Key Issues 1 and 2)

- 1.6 Peveril notes that the conclusions of the Issues and Options report about the likely levels of housing need required are strongly related to the results of the Examination into Birmingham's housing requirements as part of its Development Plan and the 'overspill' that is needed to be provided for outside the City in the Black Country. The overall figure arrived at for the housing requirements to be provided in the Core Strategy Plan period is based on the 2016/17 SHMA and then the completion figures and SHLAA assumptions. This results in a residential requirement of 21,670 dwellings with a further 3,000 dwellings added to meet the wider HMA shortfall hence an overall requirement of some 24,670 dwellings up to 2036.
- 1.7 Peveril agrees with the Black Country authorities that the requirement to meet needs emanating from Birmingham has been established and needs to be met. Failure to do so would be a failure under the duty to co-operate in terms of the soundness tests for Local Plans in the NPPF. The quantity of the unmet need from Birmingham is in itself an up to date objectively assessed need (OAN). We understand there is a methodology paper being prepared that sets out how future housing needs may be met in the Black Country, notwithstanding the fact that much work has already been done in terms of the quantification of unmet need from Birmingham, the 2016/17 SHMA etc. What needs to be certain is that the overall quantification of housing needed in the Black Country does not miss out any important considerations that might be specific to the Black Country rather than taken as read as Birmingham's unmet needs. Thus it is important that any OAN figure for the Black Country takes into account key issues such as housing market signals and economic considerations in the Black Country as well as taking as a given those calculations that affected the housing needs in Birmingham.
- 1.8 Peveril would therefore wish to see as part of the process the calculations that may follow from the methodology so that the Black Country authorities can be satisfied that all relevant considerations affecting housing land provision (and related employment land provision) in the Black Country have been taken account of in addition to the unmet need from Birmingham. It is also important to test the deliverability of the SHLAA sites which are claimed to deliver over 48,000 homes in the Plan period as well as windfall sites.

- 1.9 Notwithstanding those concerns, it is clear that overall requirement of 24,670 houses in the period to 2036 represents a significant amount of new land to be found. An up to date calculation of OAN in accordance with the emerging Government methodology (and current in relation to the methodology accepted by LPAC) would be advisable. This may result in additional dwellings to 24,670 overspill figure being generated.
- 1.10 Peveril would therefore reserve its position in terms of whether the 24,670 dwelling requirement figure to 2036 represents an appropriate OAN until the results of an up to date methodology being applied to the relevant statistics affecting the Black Country and Birmingham overspill has been undertaken and checks made of deliverability assumptions on SHLAA and windfall sites.

Employment Needs (Key Issue 3)

- 1.11 The Issues and Options report makes a conclusion that some 300 hectares of new employment land is required up to the period 2036. It is very important in Peveril's view that both the quantity of employment land and the quality of land available is comprehensively dealt with in the Issues and Options report and emerging Core Strategy. It is essential that high quality sites are identified and the most use is made of the Black Country's assets – mainly good quality highway links in order for employment land to be delivered rather than simply identified. The calculations that have been made to arrive at the 300 hectare figure – while accepted to be not as precise as required for housing – in Peveril's view understate the true need for good quality employment land.
- 1.12 Peveril is concerned that having identified a qualitative need over the Plan period of 800 hectares of land for employment (via the EDMA report), this figure is then reduced by 394 hectares of land which is either "currently available or is likely to come forward within the Black Country, including opportunities to intensify existing employment areas". The assumptions about the ability of the 394 hectares to deliver quality land – rather than be poor quality sites which will not be delivered – do not appear robust.
- 1.13 In this regard (paragraph 3.27 of the Issues and Options report), Peveril strongly supports the idea of building upon successful and high quality locations for new investment such as the M54 corridor.
- 1.14 In this regard, Peveril's view is that the existing regeneration corridors as set out in current Local Plan (see Figure 8 of the Issues and Options report) needs reviewing and widening with the potential to allocate good quality employment land within enlarged regeneration corridors (see below). The 300 hectare figure also seems somewhat low given the potential for large

employment sites to be allocated within quality locations and/or regeneration corridors. Strategic sites such as ROF Featherstone and Hilton Cross in the M54 corridor in the Wolverhampton/South Staffs area are in themselves quite large sites. The 300 hectare requirement would soon be taken up by four or five large sites if suitably high quality locations were found for employment leaving little residue left for smaller scale allocations. In Peveril's view, therefore, the Core Strategy should seek to identify key strategic employment locations first without necessarily seeking to restrict overall development for employment purposes to 300 hectares. This is in addition to reviewing the 300 hectare figure.

Strategy for Allocation of Land for Housing (Strategic Option 1A)

- 1.15 Peveril supports the conclusions made in the Issues and Options report in respect of the need to release Green Belt land to meet the housing requirement because there is insufficient brownfield land available. Peveril supports the acknowledgement within the Issues and Options report that South Staffordshire would have a key role in enabling the Black Country authorities to meet the emerging development requirements.
- 1.16 In this regard South Staffordshire is in the latter stages of its Part 2 Local Plan process. Peveril is participating in this process and it is understood the Examination into the Part 2 Plan will take place in November 2017. South Staffordshire wishes to conclude its Local Plan process and then for the new development requirements identified through the Black Country Core Strategy to 2036 to immediately be taken into account in a review of its policies. Whilst this is not ideal – and Peveril has suggested the potential to identify safeguarded areas of land to be removed from the Green Belt pending the adoption of the Black Country Core Strategy – it is probably in practical terms the best way forward. The alternative would be to suspend the current Local Plan which would not be in the interests of providing certainty (albeit for a short period) in South Staffordshire about future development requirements.
- 1.17 As far as Issue 1 in the Core Strategy is concerned – whether the provision for housing should be carried out on the basis of looking at sustainable open extensions rather than piecemeal releases – Peveril would strongly contend that priority should be given to identifying sustainable urban extensions. The land which Peveril controls to the north of Wolverhampton and to the south of the M54 (see representations below) would allow a sustainable mixed development to be planned in a more comprehensive way and for new facilities to be brought forward as part of a sustainable urban extension. The alternative for providing numerous piecemeal extensions would be a less comprehensive strategy to facilities – education; local centres; open space and transportation. With impact of development more widely dispersed

rather than concentrating in a specific allocation where it may be more possible to achieve acceptable mitigation.

- 1.18 Peveril would agree with the Council that it is difficult to define the scale of what represents a sustainable urban extension. In terms of transport and to achieve a new station (for example), the potential extension of up to 10,000 dwellings would not be unreasonable; however, there can be sustainable urban extensions that would take place with many fewer dwellings than that. From experience elsewhere, an extension of 1,000 dwellings or more could be regarded as sustainable as that level of development can provide a reasonable local centre; school and strategic open space.
- 1.19 It is also possible in a sustainable urban extension to provide employment facilities. In the case of Peveril's proposals, those employment facilities could be both local but also related to existing strategic employment sites. The presence of Hilton Cross – and potential extension to it – along with the Royal Ordnance Factory would make the area to the east of Wolverhampton a good location for a housing based urban extension because existing and proposed strategic employment sites already exist in that area. The employment land shortfall identified of 300 hectares should firsts and foremost be considered in the context of the ability to extend the existing strategic employment sites which were identified because of their good proximity to strategic transport networks.

Regeneration Corridors (Key Issue 3 and Question 10)

- 1.20 Peveril will support the concept of regeneration corridors set out in Figure 8 of the Issues and Options report, i.e. current Local Plan allocations. A review should be carried out of those corridors to see whether they can be extended or added to in a way that first and foremost allows high quality employment land to come forward. Peveril would also suggest either the extension of the existing Stafford Road regeneration corridor to the north of Wolverhampton for the creation of a new regeneration corridor along the M54. This would take within the corridor the existing strategic sites at Hilton Cross and the ROF and I54 as well as giving the ability for such sites to come forward with new housing – as Peveril suggests (see below). The regeneration corridors can be used as a basis for extension of existing good quality employment land and potential allocation of land as a sustainable urban extension.

A Potential Urban Extension to the East of Wolverhampton (Spatial Option H2)

- 1.21 Peveril's land control extends over an area of land of some 84.74 hectares lying in between the M54 to the north (including Hilton Cross); Cannock Road to the east; Underhill Lane/Bushbury Lane to the south and the northern outskirts of Wolverhampton to the west.

It is understood Wolverhampton City Council owns land (currently abandoned playing fields) in the south-western part of the site. There is woodland and Northcote Country Park at the centre of the site as well as heritage assets. The area can be put forward as a sustainable urban extension because of its location and because it is well-defined by roads that could be used as the outer edge of a new Green Belt boundary as well as being in close proximity to existing largescale employment proposals – at Hilton Cross; the Royal Ordnance Factory and I54.

- 1.22 It is not the purpose of these representations to carry out a full assessment of the landscape impact; transport or other site specific considerations. However, an initial masterplan has been prepared to identify the potential capacity of the site when taking a reasonable view of the existing on-site constraints. This masterplan is attached. It shows that the site under the control of Peveril (including the Wolverhampton City Council land) can accommodate some 38 hectares of land for housing together with a local centre; primary school; access routes and the protection of existing woodland, the country park and listed buildings. Access arrangements can be provided for in the context of a new road running east-west through the northern part of the site. This road is different to the route option 9 which the County Council is currently considering as a means of providing appropriate access for the Royal Ordnance Factory site to the north of the M54. Whatever route option is taken to serve the Royal Ordnance Factory this will not prejudice the release of the sustainable urban extension proposed by Peveril.
- 1.23 In addition to the housing areas, there is benefit in extending the Hilton Cross employment site sitting in the north-eastern corner of the area Peveril controls. This could be extended by a further 7 hectares. This area could be part of the sustainable urban extension to provide jobs for new residents alongside those being created at the Royal Ordnance Factory. In these terms the site could:
1. Provide up to 1,350 dwellings in a sustainable location.
 2. Be well related to existing and proposed strategic employment sites.
 3. Provide local facilities to support the scale of development proposed.
 4. Establish new but long term Green Belt boundaries.
 5. Be deliverable due to Peveril's land control.
- 1.24 It is considered that the potential to release this land and provide well-established Green Belt boundaries in accordance with the advice in paragraph 85 of the NPPF provides a realistic and



deliverable means of allowing the expansion of Wolverhampton – the site crosses the border between Wolverhampton City and South Staffordshire – in a way that allows the benefits of a mixed sustainable extension to the urban area to come forward. Peveril would be willing to discuss these matters further but in terms of how the policies are evolving for the Black Country Core Strategy suggests this site be identified as a sustainable urban extension. Peveril considers that the Core Strategy should identify key sites that would comprise sustainable urban extensions in a specific policy rather than necessarily make general statements about overall strategy to accommodate the 24,670 dwellings (if that is the figure eventually regarded as the OAN for the area).