

**LAND AT LITTLE ASTON ROAD**

**ALDRIDGE**



**ST PHILIPS**



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UK Land Development*

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# 1. Introduction

St Philips has interest in land at Aldridge shown on the Location Plan attached to these representations and therefore wishes to respond to the Black Country Core Strategy Review Issues and Options consultation. A Call for Sites form has also been submitted.

The existing Black Country Core Strategy (BCCS) covers the period 2006 to 2026 and needs to be updated due to, amongst other things, the need to identify land for housing to meet the needs of a rapidly growing population.

The Black Country Strategic Housing Market Assessment (SHMA) assesses the housing need across the Greater Birmingham and Black County Housing Market Area (HMA) and identifies a shortfall of land for approximately 60,000 houses.

The Black Country will be unable to accommodate all future development needs within the urban area and therefore land will be required which is currently within the Green Belt. It is in this context which the land at Aldridge is promoted for residential allocation through the BCCS Review.

Technical and design work is currently being undertaken in respect of the site and will be submitted to Walsall Council once it is complete.

St Philips has some comments and concerns about the information presented within the Issues and Options consultation and has therefore responded to certain questions posed in the consultation document.

St Philips hopes that the Black Country Authorities will consider these responses, together with the information provided in the Call for Sites forms and give due attention to the potential for the residential allocation of the identified land.

For clarity, the questions we have responses to are tabulated overleaf, followed by our detailed answers to these questions.

## 2. Questions Table

Question Number	Question Posed
1	Do you agree that the Core Strategy review should be a partial review, retaining and stretching the existing spatial strategy and updating existing policies? Yes/No; If not, what do you think should be the scope of the review?
2	Do you think that the key evidence set out in Table 1 is sufficient to support the key stages of the Core Strategy review? Yes/No; If not, what further evidence is required and, if there are any particular issues that should be taken into account in considering development on any particular sites or in any particular areas, please provide details.
3	Do you agree that the housing need identified for the Black Country over the period 2014-36 in the SHMA, and the anticipated amount of supply, are appropriate and in line with national guidance? Yes/No; If not, please explain why they are not appropriate and in line with national guidance.
5	Do you agree with the proposed approach to the Green Belt Review? Yes/No; If not, what additional work do you think is necessary?
6	Do you agree that the key issues set out in Part 3 are the key issues that need to be taken into account through the Core Strategy Review? Yes/No; If not, what other key issues should be taken into account?
7	Do you think that the Core Strategy vision and sustainability principles remain appropriate? Yes/No; If not, what alternatives would you suggest?
8	Do you think that the Core Strategy spatial objectives remain appropriate? Yes/No; If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?
9	Do you agree that Policies CPS1 and CPS2 should be retained and updated to reflect new evidence and growth proposals outside the Growth Network? Yes/No; If not, what changes do you think should be made to Policies CPS1 and CPS2 in response to new challenges and opportunities?
11a	Do you support Strategic Option 1A? Yes/No; If yes, please explain why. If no, do you support Option 1B? Yes/No; If yes, please explain why. If you support the release of further employment land for housing, what should the characteristics of these employment areas be?

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12a	Do you support Spatial Option H1? Yes/No; What criteria should be used to select suitable sites? e.g. ability to create defensible new green belt boundary, size, access to existing residential services.
12b	Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details (please submit specific sites through the 'call for sites' form).
13a	Do you support Spatial Option H2? Yes/No; What should the characteristics of Sustainable Urban Extensions (SUE's) be? e.g. minimum/maximum size, mix of uses, mix of housing types, accessibility to other areas.  What criteria should be used to select suitable sites? e.g. proximity to a rail station, availability of existing infrastructure, easy access to jobs, potential to support existing settlements/services, proximity to the existing growth network, potential to support urban regeneration.
14	Do you think there are any other deliverable and sustainable Housing Spatial Options?
15a	If all housing need cannot be met in the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA?
21	Do you think that changes are required to Policy DEL1 to ensure it covers both development within the existing urban area and any within the Green Belt? Yes/No; If yes, please provide details.
25	Will there be any new social infrastructure requirements necessary to serve large new housing developments? Yes/No; If yes, please explain the type and scale of any new social infrastructure required.
28	Do you think physical infrastructure is necessary to serve large new housing developments? Yes/No; If yes, what type and scale of physical infrastructure is necessary?
30	Do you have any suggestions around how the strategy can be developed in order to maintain the urban regeneration focus of the Black Country while at the same time bringing forward sites in the Green Belt? Yes/No; If yes, please provide details.

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31	Do you think that the right scale and form of funding is available to support the delivery of the Core Strategy review? Yes/No; If no, what alternative sources of funding or delivery mechanisms should be investigated?
34a	Do you agree that the health and wellbeing impacts of large development proposals should be considered at the Preferred Spatial Option stage of the Core Strategy review through a Health Impact Assessment approach? Yes/No; Any further comments?
35	Do you support the proposed approach to housing land supply? Yes/No; If no, please explain why.
38	Do you think that the current accessibility and density standards are appropriate for Green Belt release locations? Yes/No; If no, what standards should be applied in these locations and why?
40	Do you agree that the 2017 SHMA findings should be used to set general house type targets for the plan period? Yes/No; If no, please explain why.
42	Do you agree that the annual affordable homes target should be increased to reflect the 2017 SHMA? Yes/No; If no, please explain why.
44a	Do you think that the affordable housing requirement for eligible sites should be kept at 25% of the total number of homes on site? Yes/No; Any further comments?
45	Should an increased affordable housing requirement be set for Green Belt release sites, to reflect the likely financial viability of these sites? Yes/No; If yes, what should this be?
47	Do you think that Policy HOU5 should be expanded to cover other types of built social infrastructure and to set out standards for built social infrastructure to serve major housing developments? Yes/No; If no, please explain why.
95a	Do you think Garden City principles should be applied in the Black Country? Yes/No; If yes, how should they be applied?
95b	Should the application of Garden City principles be different for brownfield and greenfield sites? Yes/No; If yes, please explain why.
98	Do you support the proposed changes relating to Design Quality? Yes/No; If you think that any other changes should be made to Policy ENV3 please provide details.
99b	Do you think that the national access standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be

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	appropriate and why.
99c	Do you think that national space standards for housing development should be introduced in the Black Country? Yes/No; If yes, please specify what level and percentage would be appropriate and why.
99d	Do you think that the standards should be different for brownfield and greenfield sites? Yes/No; If yes, please explain how and why.
101a	Do you support the proposed changes relating to Flood Risk, Sustainable Drainage and Urban Heat Island effects? Yes/No; Further comments?
102a	Do you support the proposed changes relating to open space, sport and recreation? Yes/No; If no, please explain.
103b	Do you think that the 10% requirement should be changed? Yes/No; If yes, please specify what percentage would be more appropriate and to what type of site it should apply.
118	Do you agree with the proposal to streamline and simplify the Core Strategy Monitoring Framework? Yes/No; If no, please explain why.
119	Do you think a new Core Strategy policy is required? Yes/No; If yes, please explain why and provide details of the suggested policy.



## 3. Responses to Questions

### Question 1

Given the evidence on which the current Core Strategy is based is now very out of date, St Philips considers that a full review of the Core Strategy should be carried out.

The BCCS was prepared and adopted before the National Planning Policy Framework (NPPF) came to force in March 2012. Paragraph 47 of the NPPF requires that Development Plans are based on a full, objectively assessed need for housing, but this is not the case for the current BCCS. The entire Core Strategy should therefore be reviewed to ensure that it aligns with national guidance.

The policies within the BCCS which relate to the Growth Network, particularly policies CSP1 and CSP2 will require radical change through the Core Strategy Review to refer to the need for housing development beyond the Growth Network within the Green Belt.

### Question 2

The evidence set out in Table 1 should be sufficient to support the Core Strategy Review. However, the Government is currently proposing changes to the NPPF and Planning Practice Guidance (established through the Housing White Paper) in relation to the evidence base needed for Local Plans. Therefore further work could become necessary if and when these changes take place.

St Philips supports the two stage approach proposed to interrogate options for strategic growth in the Green Belt through the Greater Birmingham and Black Country HMA Strategic Growth Study and the Black Country Green Belt Review.

The Green Belt Review should be undertaken in line with the NPPF and have regard to paragraphs 83 to 85, particularly the need to promote sustainable patterns of development when drawing up or reviewing Green Belt boundaries.

### Question 3

St Philips has not interrogated the findings of the SHMA but understands it to be the most recent housing need evidence underpinning the BCCS Review.

The SHMA concludes that the objectively assessed housing need for the Black Country for the BCCS Review period is 78,190 homes, or 3,554 dwellings per annum (dpa).

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In accordance with the Duty to Co-operate, the Black Country has agreed to attempt to accommodate an extra 3,000 homes to help address the shortfall in the wider HMA.

St Philips understands that the Black Country Authorities are undertaking work to confirm how many houses can be accommodated from existing planning permissions and windfall sites.

Further evidence on housing needs will be developed through the BCCS Review process and St Philips hopes that all such work is made available to interested parties in a transparent manner.

It is clear from the SHMA findings that a substantial number of new homes will need to be accommodated in the Green Belt and St Philips therefore wishes to highlight the opportunity provided by the identified land which is suitable for residential development.

## Question 5

St Philips has already commented on the approach to the Green Belt Review in our response to question 2. As previously stated, the Green Belt Review should be undertaken in line with the NPPF and have regard to paragraphs 83 to 85, particularly the need to promote sustainable patterns of development when drawing up or reviewing Green Belt boundaries.

Paragraph 80 of the NPPF sets out that a Green Belt Review will assess the extent to which land designated as Green Belt performs against the purposes of Green Belt.

The identified land in Aldridge is considered to have limited Green Belt purpose and St Philips expects the Green Belt Review will come to the same conclusions when it is undertaken.

## Question 6

St Philips is content that the key issues facing the Black Country are covered within the Core Strategy Review, especially the need to identify sites for housing within the designated Green Belt.

As set out in our response to question 1, there is a critical need to look beyond the Growth Network to account for the Black Country's long term development needs.

## Question 7

The Core Strategy vision is considered by St Philips to remain appropriate because it accords with the three dimensions of sustainable development outlined in the NPPF which stems from social, economic and environmental roles.

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The Core Strategy sustainability principles are considered to remain largely appropriate, although it is St Philips view that sustainability principle 4 “*putting brownfield first*” is no longer as relevant.

This sustainability principle focuses on “*ensuring that previously developed land, particularly where vacant, derelict or underused, is prioritised for development over greenfield sites*” but St Philips wishes to highlight that, in the context of a substantial unmet housing need, it is not appropriate to use brownfield land over deliverable greenfield options.

This is especially apparent given that the level of growth that has been accommodated on brownfield land within the Growth Network (around Strategic Centres and Regeneration Corridors) over the current Core Strategy plan period has been less than anticipated.

Sustainability principle 5 of the Core Strategy states that “*the vast majority of new housing will be built on brownfield land*”, and similar to our view on sustainability principle 4, this approach is not appropriate in the context of the unmet housing need.

## Question 8

Most of the spatial objectives are considered by St Philips to remain appropriate, with the exception of spatial objective 3 which aims to “*model sustainable communities on redundant employment land in Regeneration Corridors*”.

In line with our responses to question 7, it is not appropriate to rely on brownfield land as a source of future housing sites within the Black Country, and Green Belt land offers the only realistic prospect for bridging the gap between housing need and supply.

## Question 9

St Philips believes that Policies CSP1 and CSP2 need to be drastically revised based on the changing circumstances affecting the Black Country.

The figures in Policy CSP1 and Table 1 within the Core Strategy will need to be updated and rolled forward to 2036 in line with the new evidence.

The approach to development outside of the Growth Network, as set out in Policy CSP2, will need to be amended to reflect the need to deliver new housing within the Green Belt.

## Question 11a

Both Strategic Option 1A and Strategic Option 1B recognise the need for housing in the Green Belt which St Philips supports.

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There are opportunities and challenges presented by both Strategic Options, but Strategic Option 1A appears to be more suitable for accommodating the growth needs of the Black Country over the BCCS Review plan period

There are various opportunities provided by Strategic Option 1A, especially the provision of a sustainable pattern of development, close to the urban edge of existing settlements where need arises in the Black Country.

Importantly Strategic Option 1A would significantly boost the supply of housing land and help to meet full, objectively assessed need identified in the SHMA.

### Question 12a

St Philips supports Spatial Option H1 which is based on ‘rounding off’ the Green Belt edge by identifying small to medium sized sites in the Green Belt.

There are many opportunities provided by Spatial Option H1, particularly the provision of a sustainable pattern of development.

It will be important the Black Country Authorities select suitable sites in accordance with Spatial Option H1 and the identified land at Aldridge is one such opportunity. Please refer to our response to question 12b for further details.

### Question 12b

The identified land at Aldridge is considered to be suitable for development and could be delivered within the first five years of the new Core Strategy being adopted.

The site extends 7.8 hectares and it is considered at this stage that the site could accommodate at least 200 dwellings. This assumption is based on a net developable area of 85% and a density of 30 dwellings per hectare. This view is subject to further work being carried out.

The site borders Fairlawns Spa and Health Club to the east, Druids Heath Golf Club to the north and Aldridge Court Nursing Home to the west. Cooper and Jordan Church of England Primary School is located further to the west. The site is therefore proximate to a range of local services and facilities and is just over 1km from the centre of Aldridge, where further local amenities are offered.

The site is accessed via Little Aston Road (the A454) to the south which connects the site with Aldridge. There are also bus routes along this road meaning that the site is accessible via non car modes of travel.

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Further technical and design work is underway and will be submitted to Walsall Council once it is complete in order to supplement the Call for Sites submission and these representations. St Philips hopes that the Black Country Authorities will review this submission and carefully consider the opportunity provided by this site.

St Philips is of the view that the site should be removed from the Green Belt and allocated for residential development in the new Core Strategy.

## **Question 13a**

Spatial Option H2 is supported by St Philips insofar as this Spatial Option could potentially deliver homes on a large scale, which will be important in the context of a substantial unmet housing need within the Black Country.

However, this Spatial Option would require large-scale adjustments to the Green Belt boundary with potentially major impacts on Green Belt purposes and environmental assets. In addition this approach is likely to concentrate delivery later in the plan period due to infrastructure and phasing issues, and delivery may be limited by market and infrastructure constraints.

St Philips is therefore of the view that a combination of some SUEs and small to medium sized sites (as per Spatial Option H1 to which the identified land at Aldridge aligns) would be the best way forward for the Black Country Authorities.

## **Question 14**

St Philips considers that the Black Country Authorities should consider a Housing Spatial Option which combines the approaches of Spatial Option H1 and Spatial Option H2.

This would mean that a number of small to medium sized sites would be allocated for residential development as well as one or two appropriate SUEs.

St Philips considers this would be the most sustainable approach to residential development in the Green Belt.

## **Question 15a**

St Philips does not support the 'export' of housing growth to neighbouring authorities within the HMA.

It is important that the Black Country Authorities meet their own housing needs and all potential housing land supply options, including Green Belt sites, must be explored fully before any consideration is given to the 'export' of housing growth.

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In addition to meeting its own needs, the Black Country has committed to explore the potential to accommodate 3,000 houses arising from Birmingham's unmet need. If the Black Country looked to 'export' housing growth, this would only serve to exacerbate existing issues within the HMA.

## **Question 21**

All new development should have the appropriate type and quantum of supporting infrastructure. However, the Black Country Authorities must carefully consider the changes made to policy DEL1, which should not place an unnecessary burden on small to medium development sites, such as the identified land at Aldridge.

## **Question 25**

New social infrastructure is likely to be required to serve large new housing developments, especially SUEs (of 500-5,000 houses).

It is not considered that the identified land at Aldridge would require any on site social infrastructure but this will be explored during the technical and design work which is underway.

## **Question 28**

As per our response to question 25, new physical infrastructure is likely to be required to serve large new housing developments, especially SUEs (of 500-5,000 houses).

The physical infrastructure required at the identified land at Aldridge will be explored during the technical and design work that is being carried out.

## **Question 30**

The Issues and Options consultation document makes clear the intended strategy of maintaining the urban regeneration focus of the existing Core Strategy and prioritising the use of brownfield land over greenfield land (and Green Belt land).

St Philips wishes to highlight the urgent need for new homes in the Black Country, which means that this intended strategy is not wholly appropriate. The strategy should be developed with the priority of identifying Green Belt solutions.

## Question 31

The Issues and Options consultation document states that 25% of the existing Black Country housing land supply is not viable under current market conditions and that consequently, it is not certain that there is enough funding available to bring forward sites to meet the short to medium term housing growth needs.

St Philips believes that the funding mechanisms listed in the Issues and Options consultation document are generally appropriate, but is conscious of the risk that these funding sources will fail to deliver.

Deliverable Green Belt sites should thus be allocated through the BCCS Review, such as the identified land at Aldridge.

## Question 34a

Health Impact Assessments are probably more relevant to larger sites such as SUEs of between 500 and 5,000 houses but does feel this would be an appropriate means to interrogate the sustainability of sites submitted through the Call for Sites exercise.

## Question 35

St Philips has not undertaken a detailed assessment of any evidence on which the housing land supply within the BCCS Review is based.

The Issues and Options consultation document outlines various sources of potential housing land supply and notes that if these sources prove to be of strategic significance, they will form a part of the housing land supply within the new Core Strategy.

The potential sources of supply referred to in the Issues and Options consultation report are not disputed by St Philips; however, such sources of supply should not be relied upon in the future given some of these have failed to deliver in the past. Green Belt land is definitely required as a source of future housing land supply.

## Question 38

St Philips supports the proposal in the Issues and Options consultation document to remove the final paragraph of policy HOU2.

St Philips would object to accessibility standards applied to all residential allocations as this could threaten the viability and deliverability of sites. It would also conflict with recent information set out in the Housing White Paper.

The wording of Policy HOU2 should be changed to refer to accessibility and density standards being determined by local factors.

The current accessibility standards set out in policy HOU2 may not be appropriate for Green Belt release sites and should be fully tested in relation to emerging residential allocations on the basis of viability.

## **Question 40**

The SHMA may be appropriate for setting general house type targets for the plan period; however, a flexible approach should be adopted by the Black Country Authorities to allow for changing local circumstances.

The Issues and Options consultation document refers to the need for sheltered and extra care houses, and there should also be a flexible approach to these tenures so as not to preclude the viability and deliverability of sites (particularly Green belt release locations).

## **Question 42**

Whilst St Philips appreciates the importance of affordable housing and the role of the Black Country Authorities in ensuring that all housing development of a reasonable scale contributes, the prescriptions within Policy HOU3 should be flexible and refer to the requirements being subject to viability considerations.

## **Question 44a**

The requirement for 25% affordable homes on eligible sites should only be kept at this level if it does not threaten the viability and deliverability of housing sites. The wording of Policy HOU3 should make this clear.

## **Question 45**

The affordable housing requirement for Green Belt release sites should not be increased as this will jeopardise the viability and deliverability of these sites. As such, this proposal is strongly opposed by St Philips.

## **Question 47**

The provision of social infrastructure is an important part of any development proposal, and particularly those of a large scale. However the requirements established in the new Core Strategy should be tested so that they do not threaten the deliverability or viability of small to medium sites. Major housing developments



should be defined within Policy HOU5 so it is clear which sites the provision of social infrastructure would apply to.

### **Question 95a**

Garden City principles are considered by St Philips to be a sensible approach for new housing growth within the Black Country to ensure that development is sustainable, but if Garden City Principles are added to the new Core Strategy policies, these should be tested to ensure that they do not threaten the viability or deliverability of housing sites.

### **Question 95b**

Different Garden City principles may be appropriate for brownfield and greenfield sites but this would need to be robustly tested if the distinction is proposed to be written on to policies within the new Core Strategy.

### **Question 98**

The proposed changes to Policy ENV3 to delete reference to the Code for Sustainable Homes Level 3 is supported by St Philips, as this no longer aligns with national planning guidance and legislation.

### **Question 99b**

St Philips would only support the introduction of a local accessibility standard if this were to be introduced with an element of flexibility as it could potentially lead to viability issues and threaten the delivery of residential sites.

### **Question 99c**

St Philips would only support the introduction of the national space standard if this were to be introduced with an element of flexibility as it could potentially lead to viability issues and threaten the delivery of residential sites.

### **Question 99d**

Viability is often a challenge in respect of accessibility and space standards and it may be sensible to set different standards for brownfield and greenfield sites, given their different contexts.

Whatever standards are introduced into the new Core Strategy should be rigorously tested and introduced with an element of flexibility as it could potentially lead to viability issues and threaten the delivery of residential sites.

### **Question 101a**

St Philips wishes to see that any changes to Policy ENV5 to prioritise natural green space SUDs are rigorously tested and introduced with an element of flexibility to avoid precluding the delivery of residential sites.

### **Question 102a**

St Philips wishes to see that any changes to Policy ENV6 in respect of open space, sport and recreation provision on site are rigorously tested and introduced with an element of flexibility to avoid precluding the delivery of residential sites.

### **Question 103b**

St Philips would object to a policy with a higher percentage energy efficiency requirement if this threatened viability and delivery of residential sites. Any changes to the existing Core Strategy policy should be justified with evidence.

### **Question 118**

St Philips supports the proposals to streamline and simplify the Core Strategy Monitoring Framework, particularly the proposal to focus on the delivery of new houses.

### **Question 119**

Green Belt sites will need to be allocated for residential development through the Core Strategy Review to accommodate the unmet housing need within the Black Country and consequently St Philips suggests that there is a new Core Strategy policy which deals directly with this matter, in which specific sites within the Green Belt are allocated for residential development. St Philips wishes that the Black Country Authorities consider the identified land at Aldridge one such potential allocation.

## 4. Conclusions

These representations set out St Philips response to the Black Country Core Strategy Review Issues and Options consultation document.

St Philips is pleased that a review of the current Core Strategy is being undertaken in order to address key challenges within the Black Country, especially the pressing need to identify land for housing, and the recognition that some of this land for housing will need to be in the Green Belt.

A Call for Sites form has been submitted in respect of the identified land at Aldridge, which St Philips believes offers a promising opportunity for residential development. Further technical and design work is underway and will be submitted to Walsall Council once it is complete in order to supplement the Call for Sites submission and these representations.

St Philips would like to be notified of any developments in the preparation of the new Core Strategy and of the Black Country Authorities' view on the identified land in due course.

Location Plan - Land at Little Aston Road, Aldridge



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