

8 September 2017

Dudley Metropolitan Borough Council
Council House
Priory Road
Dudley
DY1 1HL

Dear Sir / Madam

BLACK COUNTRY CORE STRATEGY REVIEW ISSUES & OPTIONS

These representations are made by Hallam Land Management Limited in respect of land north and south of Jones Lane, Great Wyrley ('the site').

Introduction

The site is located within the administrative area of South Staffordshire District Council ('SSDC'). SSDC is a neighbouring authority to the Black Country Authorities (including Dudley, Sandwell, Wolverhampton and Walsall), whom make up the Black Country Core Strategy ('BCCS') Plan area.

The BCCS was adopted in February 2011 and covered the period 2006 to 2026. The BCCS is now being reviewed to ensure its spatial objectives and strategy are being effectively delivered, and it remains up to date to reflect the Black Country's ambitions for significant residential growth.

We welcome the opportunity to provide comments on the BCCS Review Issues and Options Report (the 'I&O Report'). These representations are supported by the accompanying:

- Site Location Plan
- Call for Sites Form

Q2. Do you think that the key evidence set out at Table 1 is sufficient to support the key stages of the Core Strategy review? 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?

The evidence base currently comprises employment studies that assess strategic sites, high quality employment land and regional logistics sites. Additional employment evidence is necessary to assess the entire supply of employment land across the Black Country, including the value, demand and characteristics of the existing supply. This will be crucial to informing whether it is feasible to release employment land to deliver approx. 10,400 new homes.

If any existing employment sites are to be proposed for allocation as residential development the evidence base should demonstrate the suitability of the land. This includes consideration of contamination issues, whether the land is a suitably attractive location for residential development, and whether existing neighbouring uses would provide an issue for future residents.

A number of infrastructure studies (including flood risk / water, waste, and viability) are to be undertaken to inform the BCCS Review Preferred Options Paper. Infrastructure viability will be a key factor in determining the deliverability and capacity of sites to meet the area's housing needs. To provide a robust assessment of infrastructure public consultation should be undertaken.

These studies should also not just assess infrastructure within the Black Country exclusively, but also the infrastructure required outside of the area which may be required to meet its needs. For instance, some residents from within the Black Country attend schools in other authority areas, such as South Staffordshire. Cross boundary working with other authorities will be crucial in this respect.

It is also considered that the Black Country authorities include a robust landscape character assessment in the scoping of the evidence base document *Strategic Mapping of the Black Country's Natural Environment*. We expect that an updated landscape character assessment will engage with neighbouring authorities such as SSDC and stakeholders involved in landscape assessment and captures changes to the aesthetic, perceptual and experiential qualities of the landscape, particularly land to the north and south of Jones Lane, which adjoins existing residential built form.

The Black Authorities should adhere to the aspirations set out in the West Midlands Combined Authority Strategic Economic Plan ('WMCA SEP') (June 2016), which recognises the importance of planning to meet ambitions targets such as the creation of 500,000 new jobs and an addition 215,000 homes within the region. The BCCS Review needs to provide a robust strategy to meet the significant growth across the Black Country and should do in close cooperation with SSDC to meet the priority actions set out in the WMCA SEP.

Q3. 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?

The consultation on a standardised approach to the calculation of OAN is scheduled for September 2017 and, according to correspondence from DCLG (dated 31st July 2017), any Plans which have not been submitted by March 2018 (as will be the case for the BCCS Review) will be required to apply the new standardised methodology.

In terms of the SHMA, the Objectively Assessed Housing Need ('OAHN') is derived from the 2014 Sub National Household Projections which PPG confirms represents the starting point for calculating need.

We reserve the right to comment further on the OAHN once the standardised methodology has been published, and used to calculate the Black Country's needs.

Q5. Do you agree with the proposed approach to the Black Country Green Belt Review? If not, what additional work do you think is necessary?

The Green Belt Review should be a robust assessment, undertaken in accordance with national planning practice guidance and the NPPF, specifically taking account of the need to promote sustainable patterns of development and not including land which it is unnecessary to be kept permanently open.

As part of this the methodology for the Green Belt Review should be published for consultation prior to work commencing. This will be important to ensure the Review is robust and has the support of the development industry.

The I&O Report indicates the GBHMA Strategic Growth Study (renamed the 'Strategic Locations Study') will "inform and provide the basis" for the Black Country Green Belt Review.

The methodology for the Strategic Locations Study, made available in July 2017, is very broad; referring to the Green Belt will be assessed in 'five sections'. If the study is too broad, and the strategic areas identified too general, it will not form a sound basis for the Black Country Green Belt Review to conclude which land is suitable for Green Belt release.

The Green Belt Review should be carried out in conjunction with assessing sustainable locations for residential development in neighbouring authorities such as SSDC, which falls within the same strategic housing market area and maintains strong economic links.

Q6. 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? If not, what other key issues should be taken into account?

The nine key issues identified at Part 3 of the I&O Report represent the matters which will be integral to the BCCS Review achieving its ambitious plans for growth.

Mindful of the ambitious levels of growth proposed for the Black Country, the three key issues relate to housing need, the need for a review of the Green Belt, and the importance of working effectively with neighbours are the most important to take account through the BCCS Review.

The need to review the role and extent of the Green Belt in order to meet the housing needs of the area should be seen as a critical thread throughout the BCCS Review, reflecting issues specific to the Black Country. The key to unlocking this significant level of growth will be meeting the duty to cooperate on the homes needed in the Greater Birmingham and Black Country Housing Market Area.

Q7. Do you think that the Core Strategy vision and sustainability principles remain appropriate? If not, what alternatives would you suggest?

The adopted BCCS' vision is underpinned by three 'major directions of change', none of which specifically refer to meeting the Black Country's housing needs. The BCCS Review vision would be more robust if it was underpinned by the nine key issues set out at Part 3 of the I&O Report and made direct reference to the supply of new homes.

Q8. Do you think that the Core Strategy spatial objectives remain appropriate? If not, what alternatives would you suggest and how might these changes impact on individual Core Strategy policies?

It is considered that the spatial objectives need to be revisited to ensure they are up to date and are a sound basis for meeting the emerging housing needs. It is therefore imperative that these needs are reflected in the objectives, which will be used to measure the success of the Plan.

The objectives must also be more robust than those of the current BCCS owing to the admission that the BCCS Review will test the deliverability of sites in the Green Belt, some of which will lie in South Staffordshire.

In addition, there must be reference made to the duty to cooperate and the requirement for the Black Country Authorities to work collaboratively on planning issues that cross administrative boundaries, such as the Green Belt Review and the delivery of new homes.

Q11a. 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?

We do not have any general preference for either Strategic Option 1A or 1B; however the comments below should be noted.

At the current time there is an established need for the Black Country Authorities to accommodate 81,190 new homes and up to 300 ha of new employment land between 2014 and 2036. It is clear that both are pressing needs which will require significant land.

There is currently a deficit of 57 ha of gross employment space across the Black Country. The monitoring data at Appendix C of the I&O Report identifies that there is a surplus in local quality employment land (146 ha), but a deficit of 218 ha in high quality employment land. This does not distinguish between different types of employment, including different use classes and size.

The Black Country's employment land is characterised by its supply of smaller industrial units which are typically adjacent to residential areas. Whilst some of the businesses may not be 'friendly' to neighbouring uses, these types of units form the back bone of the Black Country economy and their loss would negatively impact business in the area. The loss would also remove local, sustainable job opportunities.

As set out in our response to Q2 further employment land supply evidence is required. Through this there may be opportunities to replace derelict employment land with housing, however new employment sites tend to be of higher quality, reflecting more modern industries (such as large logistic sites). They are unlikely to replace the smaller industrial unit stock, which have numerous benefits including lower rents, being suited for 'start up' and smaller businesses which reflect of the Black Country's employment profile. New large, greenfield strategic employment sites are unlikely to be affordable for the types of businesses which currently occupy the smaller industrial unit stock.

With the Black Country facing an overall employment land deficit of 300 ha, the authorities should be seeking to protect the smaller industrial stock where possible and not maximising it for residential uses.

The Councils should also be mindful of the viability of regenerating employment land for residential use, and whether the market could sustain development on these sites. This is demonstrated by the number of previously developed sites in the Black Country allocated for housing but are yet to be delivered, and show no sign of coming forward for development in the near future.

Q12a. Do you support Spatial Option H1? Yes / No; What criteria should be used to select suitable sites? e.g. ability to create a defensible new Green Belt boundary, size, access to existing residential services.

Please refer to our response to Q14.

Q13a. Do you support Spatial Option H2? What should the characteristics of Sustainable Urban Areas (SUEs) 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.

Please refer to our response to Q14.

Q14. Do you think there are any other deliverable and sustainable Housing Spatial Options? Yes/No; If yes, please provide details.

Any site selection criteria should reflect the NPPF, recognising that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

For instance, we consider that Great Wyrley, which is located to the immediate north of the Black Country Authorities plan boundary, is a suitable settlement to direct additional housing growth towards. This is largely attributable to the excellent transport services in the form of Landywood railway station and an extensive local bus network. In addition, the settlement is located within close proximity of employment and leisure opportunities at Longford and Bridgtown, which can be accessed through sustainable transport modes. Furthermore, there are a number of education establishments within the Great Wyrley area including a secondary school and three primary schools.

The BCCS Review should also not make assumptions that new development will have major impacts on Green Belt purposes and environmental assets. Firstly, any site's performance against the Green Belt purposes is separate to any site selection process. The Green Belt Review is a separate exercise to determining the sustainability of a site. Secondly, potential sites in the Green Belt can have many environmental benefits, including delivering significant public open space (it is widely recognised the Black Country Green Belt is largely inaccessible), as well as biodiversity enhancements.

Therefore, it is considered that land at Jones Lane offers a suitable opportunity for residential development and it will be critical for the Black Country Authorities to work with neighbouring authorities, such as SSDC, to identify sustainable locations for release from the Green Belt.

Q15a. If all housing need cannot be met within the Black Country, do you support the 'export' of housing growth to neighbouring authorities within the HMA? What factors should be taken into account in an assessment of the opportunities in neighbouring authorities e.g. proximity to the edge of the urban area, proximity to a rail station, availability of existing infrastructure, easy access to jobs?

For the purpose of demonstrating soundness, the Black Country Authorities will need to demonstrate the BCCS Review is effective i.e. it must be deliverable over its plan period and based on effective joint working on cross boundary strategic priorities, which includes the delivery of significant housing growth.

If the Black Country Authorities conclude that the objectively assessed housing need cannot be met within its own administrative boundary then it must act in accordance with paragraph 178 of the NPPF which outlines public bodies (e.g. local authorities) have a duty to cooperate on planning issues that cross administrative boundaries.

It is therefore expected that should the Black Country Authorities be unable to meet their objectively assessed housing needs joint working will be required with neighbouring authorities, such as SSDC, where there are sustainable opportunities for housing growth (i.e. land at Jones Lane, Great Wyrley) in proximity to the edge of an existing urban area; proximity to a rail station; available existing physical and social infrastructure; and easy access to jobs.

Question 15b – Do you think there are any potential locations that should be considered? Yes/No; If yes, please provide details.

Please refer to our response to Q14.

Q35. Do you support the proposed approach to housing land supply? If no, please explain why.

The BCCS Review proposes at paragraph 6.30 to 'update' Policy HOU1, which in our view is considered necessary. There are now greater housing needs, the NPPF has been published and the WMRSS has been revoked, and the adopted BCCS has not been delivering the required level of growth. As such the approach to housing land supply should be reviewed.

Given there is a shortfall of 3,039 dwellings against the targets set in the adopted BCCS, largely as a result of brownfield sites not being developed due to viability issues, the BCCS Review should include a 10% lapse rate should be applied to the requirement to ensure flexibility in deliverability should sites in the supply not come forward.

Conclusion

We welcome the opportunity to engage with the Black Country authorities in respect to the emerging BCCS Review.

In meeting the proposed level of growth Green Belt release will be necessary. We are promoting land at Jones Lane, Great Wyrley for the potential delivery of a significant number of new homes. The site is in a sustainable location and can make a significant contribution to meeting the Greater Birmingham HMA housing needs.

We trust that the information provided within these representations will be considered by the Black Country Authorities.

Yours sincerely

Hallam Land Management Limited